Final Action: MEC No. 23-0051-I and 23-0052-I: Concerned Citizens of Bolivar & Polk Counties, Janet Arnold

Date: 02/26/2024

The Missouri Ethics Commission took final consideration of the complaint filed against a group identified as Concerned Citizens of Bolivar & Polk Counties (CCBPC), and member, Janet Arnold, at its February 26, 2024, meeting.

The complaints filed with the Commission alleged that Concerned Citizens of Bolivar & Polk County, Missouri, and Janet Arnold failed to register a campaign finance committee and failed to report expenditures and/or contributions.

CCBPC is a group of people who meet every month to discuss issues and encourage people to call state senators and representatives when they agree or disagree with their actions. In the Fall of 2023, approximately 15 to 20 members contributed approximately \$3,000 in cash to pay for the creation and printing of advertisements relating to a tax levy increase on the ballot for the November 7, 2023, election in Bolivar, Missouri. The tax levy increase would fund tuition discounts for students in the Bolivar school district who attend Ozark Technical Community College (OTC).

The investigation showed Brad Wommack, a member of CCBPC, collected the contributions for the advertisement featured in the November 1, 2023, edition of the Bolivar Herald-Free Press. The paid for by disclosure printed on the ad read "Paid for by Concerned Citizens of Bolivar and Polk County, Missouri- Janet Arnold, Treasurer." Ms. Arnold contributed \$100 and agreed for her name to be used in the advertisement because the newspaper required the name of a treasurer.

Mr. Wommack also ordered and paid for the printing and mailing of a direct mailer that stated, "Paid for by Concerned Citizens of Bolivar and Polk County, Missouri". Mr. Wommack collected and paid \$3,035.07 in total for the printed materials relating to the tax levy.

Based on the above-mentioned activity, Mr. Wommack should have filed a statement of committee organization registering a committee with the MEC and filed reports. Mr. Wommack also collected cash contributions and made cash expenditures in excess of statutory allowances and included incorrect paid for by disclosures on the materials.

While the investigation in fact found campaign finance violations, all relevant legal actions were taken by Mr. Wommack who was not named in the complaint. Rather, the complaint named Janet Arnold who was identified as the treasurer on the materials but did not carry out any of the activities of a treasurer. Her sole involvement was to contribute money and agree to have her name printed in the advertisement.

Under the Missouri laws which govern Commission investigations of complaints, the Commission found no reasonable grounds exist to support violations of Chapter 130, RSMo., as to Janet Arnold and dismissed the complaint as it was unable to proceed against the responsible party.

Elizabeth L. Ziegler Executive Director