



## Missouri Ethics Commission

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EXECUTIVE DIRECTOR

### **Final Action: MEC No. 20-0005-I – Governor Mike Parson, Parson for Missouri, Uniting Missouri PAC, and Charlotte Boyer.**

**Date: August 3, 2020**

At its August 3, 2020 meeting, the Missouri Ethics Commission took final consideration of the complaint filed against Governor Mike Parson and his candidate committee, Parson for Missouri, as well as the Uniting Missouri PAC and its treasurer, Charlotte Boyer.

The complaint that was filed with the Commission alleged that Governor Parson and his candidate committee:

- Improperly coordinated air travel with a political action committee;
- Failed to report the receipt of in-kind contributions in the form of air travel; and,
- Accepted contributions that exceeded allowable contribution limits.

Similarly, the complaint alleged that Uniting Missouri PAC:

- Improperly coordinated air travel with a candidate/candidate committee;
- Failed to report the air travel as contributions made to the candidate/candidate committee;
- Failed to timely report the receipt of in-kind contributions (air travel); and
- Failed to accurately report the fair market value of in-kind (air travel).

Upon reviewing the investigation report, the Commission determined there were reasonable grounds to believe that a violation existed as to some of these allegations. Specifically, the Commission found reasonable grounds to support the allegation that Uniting Missouri PAC failed to timely and accurately report the receipt of in-kind contributions related to air travel. Those violations are detailed in the Joint Stipulation of Facts, Waiver of hearing Before the Missouri Ethics Commission, and Consent Order with Joint Findings of Fact and Conclusions of law filed on August 3, 2020.<sup>1</sup>

As to the complaint's allegations against Governor Parson and his candidate committee, Parson for Missouri, the investigation found that in December of 2019 and again in February 2020, Uniting Missouri PAC provided Governor Parson with air travel, which they maintain was for the purpose of fundraising for the PAC. The Commission has previously opined that "[n]othing in Chapter 130 or the Missouri Constitution prohibits a candidate from appearing at a fundraising event, or from fundraising on behalf of" a continuing committee or PAC. MEC Opinion 2017.09.CF.018.

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<sup>1</sup> These documents are available as Final Actions on the MEC website.

The investigation undertaken by the MEC confirmed that, in both instances, air transportation was donated to the Uniting Missouri PAC.

The complaint alleged that Governor Parson was also fundraising on behalf of his candidate committee during both trips, but there was no evidence to suggest any fundraising took place during the December 2019 trip to Washington, D.C. on behalf of Parson for Missouri. And, although Parson for Missouri hosted a fundraising event in Florida in February of 2020, the MEC's investigation confirmed that that event was conceived after the travel arrangements for Uniting Missouri's fundraising event were already settled, and the use of airfare was not sufficiently tied to this fundraising event.

Beyond the facts articulated in the Joint Stipulation document, the MEC investigation did not find reasonable grounds exist to support the alleged violations of Chapter 130, RSMo, and the Commission therefore dismissed the allegations against Governor Mike Parson and Parson for Missouri.