THE MEC GUIDE TO ETHICS LAWS

A PLAIN ENGLISH SUMMARY

2027



This guide is intended to provide a plain English summary of the Missouri ethics laws, including laws affecting the activities of individuals who are or may become candidates for elective office at the state, county, municipal, or special district level in Missouri.

Information about the Missouri Ethics Commission and all forms and requirements can be found on the Commission's website at mec.mo.gov.

§ 105.973, RSMo

TABLE OF CONTENTS

TABLE OF CONTENTS 2

CHAPTER 1: ABOUT THE MISSOURI ETHICS COMMISSION 4

1.1 – Who we are 5

1.2 – Our mission 5

1.3 – Advisory Opinions 5

CHAPTER 2: PERSONAL FINANCIAL DISCLOSURE (PFD) 6

2.1 – Terms to know 7

2.2 – Who is required to file a PFD? 7

2.3 – PFD filing options 9

2.4 – PFD candidate filers 9

2.5 – PFD annual filers 11

CHAPTER 3: CAMPAIGN FINANCE DISCLOSURE 12

3.1 – Terms to know 13

3.2 – Non-committees, out-of-state committees, and federal PACs 14

3.3 – When and how to register a committee 15

3.4 – Committee reporting requirements and filing deadlines 19

3.5 – Paid for by disclosure 22

3.6 – Contribution limits and restrictions 24

3.7 – Post-election guidelines for candidate and campaign committees 31

CHAPTER 4: CONFLICT OF INTEREST 33

4.1 – What is governmental conflict of interest? 34

4.2 – Providing services and conducting business 34

4.3 – Employment and compensation 35

4.4 – Decision-making....35
4.5 – Use of public funds....36
4.6 – Governmental nepotism....36
CHAPTER 5: LOBBYING....38
5.1 – Terms to Know....39
5.2 – Lobbyist requirements....40
5.3 – 2027 lobbyist reporting deadlines....41
5.4 – Waiting periods....41
5.5 – Additional lobbyist restrictions....42
CHAPTER 6: COMPLAINTS AND INVESTIGATIONS....43
6.1 – What does the MEC investigate?....44
6.2 – How to submit a complaint....44
6.3 – Limitations on complaints against candidates....45
6.4 – Complaint proceedings....45
6.5 – Commission actions....45
ADDITIONAL RESOURCES....46



Chapter 1: About the Missouri Ethics Commission

In this chapter:

- Who We Are
- Our Mission
- Advisory Opinions

1.1 – WHO WE ARE

§ 105.955, RSMo

The Missouri Ethics Commission (MEC) was created by the Missouri Ethics Law of 1991.

The Commission consists of six members, each appointed by the Governor with the advice and consent of the Senate for a four-year term. Commissioners are selected from different congressional districts, with no more than three commissioners from the same political party. However, once appointed, Commissioners serve in a non-partisan manner. A chair and vice chair are elected every two years. The Commission employs an Executive Director to oversee the day-to-day operations of the agency's professional and non-partisan staff.

The Commission enforces Missouri's governmental ethics laws and retains information and reports related to lobbyists, personal financial disclosure, campaign finance disclosure, and conflict of interest laws.

1.2 – OUR MISSION

The MEC serves the public interest by promoting and maintaining transparency, accountability, and compliance with campaign finance, lobbying, and conflict of interest laws. The Commission educates and assists the citizens of Missouri, public officials, lobbyists, and those participating in public elections, by increasing awareness and understanding of the law. The MEC investigates and enforces these laws consistently.

1.3 – ADVISORY OPINIONS

An advisory opinion is issued by the Commission and provides its interpretation of a law relative to a specific fact pattern. The Commission may issue a written opinion on any matter for which it is authorized to receive a complaint. See section 6.1 – What does the MEC investigate? for more information.

The requester must be directly affected by the application of the law to the facts presented. An advisory opinion may act as prospective legal guidance to the person submitting a written request. The requesting person will not be held liable for relying on the opinion which may act as a defense of justification against prosecution for the requester.

Advisory opinions specifically apply to the facts presented, but others may use the opinion as a guide for the Commission's interpretation of the law. Reviewing existing advisory opinions may aid in answering questions regarding Missouri's governmental ethics laws. Advisory opinions are compiled and published on the Commission's website for review. Use the Advisory Opinion search to search for and view opinions by topic, keyword, statute, or date.

The requester must submit a written request for an advisory opinion to the MEC.



Chapter 2: Personal Financial Disclosure (PFD)

In this chapter:

- Terms to Know
- Who is Required to File a PFD?
- PFD Filing Options
- PFD Candidate Filers
- PFD Annual Filers

2.1 – TERMS TO KNOW

2.1.1 – PERSONAL FINANCIAL DISCLOSURE (PFD) - *§§ 105.483 – 105.492, RSMo*

Many candidates, public officials, and public employees must disclose their private financial interests to identify and prevent potential conflicts of interest with their public position. Filers must disclose their financial interests as well as the interests of their spouse and any dependent child. Personal financial disclosure forms and requirements are commonly referred to as "PFD."

§ 105.491, RSMo, requires a request to receive copies of PFDs filed with the Commission. Therefore, PFDs are not available for public viewing on the MEC's website.

State law allows the name and employment information of dependent children under the age of 21 to be redacted from a PFD upon written request. To request the redaction of a child's information, submit the Personal Financial Disclosure Dependent Child Redaction Request Form, located in the Financial Disclosure section of the MEC's website, on an annual basis.

2.1.2 – POLITICAL SUBDIVISION - *§ 105.450(9), RSMo*

Political subdivisions include, but are not limited to, a county, city, town, village, township, school district, library district, public water supply district, road district, fire protection district, ambulance district, hospital district, nursing home district, and other districts (formed pursuant to Missouri law) to provide limited, specific services.

2.2 – WHO IS REQUIRED TO FILE A PFD?

2.2.1 – STATE LEVEL FILERS – *§§ 105.483 and 105.489, RSMo*

The following state-level officials, employees, and candidates must file a PFD with the MEC include (but not necessarily limited to):

- Statewide officeholders, candidates, and designated staff.
- State Senators, State Representatives, and General Assembly candidates.
- Certain state board and commission members.
- State judicial candidates who are not sitting judges.
- Certain employees are authorized to promulgate or adopt rules and regulations or who serve as the chief administrative officer, chief purchasing officer, or full-time general counsel.

2.2.2 – LOCAL LEVEL FILERS – *§§ 105.483 and 105.489, RSMo*

To identify PFD filers at the local level, consider the annual operating budget of the political subdivision and whether the political subdivision has chosen to adopt a conflict of interest ordinance, identifying positions required to file a PFD.

ANNUAL OPERATING BUDGET UNDER $1 MILLION

Political subdivisions with an annual operating budget under $1 million do not have any officials, employees, or candidates who are PFD filers.

ANNUAL OPERATING BUDGET OVER $1 MILLION

Political subdivisions with an annual operating budget over $1 million may adopt a conflict of interest ordinance identifying positions required to file a PFD. The ordinance must be readopted every two years by September 15, and a certified copy must be filed with the MEC within ten days of adoption/readoption. Local filers in political subdivisions with an annual operating budget over $1 million include the following:

- All candidates and elected officials in political subdivisions where no ordinance has been adopted/readopted.
- Candidates and public officials where an ordinance has been adopted and filed with the MEC that meet one or both of the following:
    - The candidate, official, or their relative (related within the first degree of blood or marriage) is doing business or owns a substantial interest in a business that has conducted business with the political subdivision in excess of $500.
    - The ordinance specifically requires the filing of a PFD.
- Certain employees who are authorized to promulgate or adopt rules and regulations or who serve as the chief administrative officer, chief purchasing officer, or full-time general counsel.
- Municipal judges (if required by a political subdivision).

2.2.3 – JUDICIAL FILERS – *§§ 105.483 and 105.489, RSMo*

The following judges must file their PFD with the Missouri Supreme Court:

- Missouri Supreme Court judges.
- Appellate judges.
- Circuit judges.
- Associate circuit judges.

State judicial candidates who are not sitting judges file their PFD with the MEC.

2.3 – PFD FILING OPTIONS

If the PFD deadline falls on a weekend or an official holiday, the deadline is extended to the next business day. Electronically filed, faxed, and hand-delivered filings must be received by the MEC no later than the deadline. Mailed filings must be postmarked no later than midnight the day before the filing deadline.

2.3.1 - ELECTRONIC FILING

Those electronically filing a PFD for the first time can request an account on the MEC's website.

1. From mec.mo.gov, select the login button in the top right corner.
2. Select PFD E-Filer Account Request from the drop-down menu.
3. Complete and submit the requested information.
4. Upon processing the request, the MEC will email the requester their login credentials to access the PFD electronic filing system.

Once a PFD is filed electronically, a confirmation email will automatically be sent to the email address on file for the filer. In the event the filer must file subsequent PFDs, the electronic filing system allows users to pull forward previously entered information, which can be updated as necessary.

2.3.2 – PAPER FILING

Paper forms can be found under the Financial Disclosure tab on the MEC's website. Paper filings require an original signature. Those filing on paper will not receive automatic confirmation of receipt. Submit paper forms via mail, fax, hand-delivery, or email:

- **Mail:** PO Box 1370, Jefferson City, MO 65102
- **Fax:** 573-526-4506
- **Hand-delivery:** 3411 Knipp Drive, Suite A, Jefferson City, MO 65109
- **Email:** pfdonline@mec.mo.gov

2.4 – PFD CANDIDATE FILERS

A candidate filer is an individual running for public office who is required to file a PFD by virtue of the office the candidate is seeking. This includes candidates for statewide office, General Assembly, and candidates in political subdivisions with an annual operating budget over $1 million (unless the subdivision has adopted an ordinance or resolution which excludes the candidate from filing a PFD).

See § 105.487(1), RSMo, for more information about candidate PFD filers.

2.4.1 – 2027 CANDIDATE PFD FILER DEADLINES

A candidate's PFD is due no later than 14 days after the closing date of filing for candidacy.[1] Failure to file a PFD by the 14-day deadline results in $10 per day late fees. Candidates who fail to file their PFD by the 21st day after the close of candidate filing face disqualification and removal from the ballot. If a political subdivision has a conflict of interest ordinance and filing deadlines are not met, penalties (if any) are assessed by the political subdivision according to its ordinance.

ELECTION DATE	14-DAY PFD FILING DEADLINE	21-DAY PFD FILING DEADLINE
February 2, 2027	November 17, 2026	November 24, 2026
March 2, 2027	December 15, 2026	December 22, 2026
April 6, 2027	January 19, 2027	January 26, 2027
August 3, 2027	May 18, 2027	May 25, 2027
November 2, 2027	August 17, 2027	August 24, 2027

Candidate filers must file their PFD with the MEC and provide a copy to their political subdivision, if it has an ordinance. If the PFD deadline falls on a weekend or an official holiday, the deadline is extended to the next business.

A candidate PFD filer in a primary election must amend their PFD by the Monday before the general election if they obtain any additional financial interests or have any change in their existing financial interests since the filing of their last PFD.

2.4.2 – CANDIDATE FILER NOTIFICATION

A candidate receives notification of their PFD filing requirement and deadline on the Notice to Candidate Form when they file a Declaration of Candidacy with their election authority. This may be the only notification a candidate receives about their PFD filing requirement.

2.4.3 – REPORTING TIME PERIOD

- **New candidates:** report information for the 12 months prior to the closing date of filing for candidacy.
- **Incumbent candidates:** candidates who are also annual filers report information from January 1 of the previous calendar year through the closing date of filing for candidacy. This period may be longer than 12 months.

[1] An individual nominated as a candidate after the certification date must file a PFD within 14 days of nomination.

2.5 – PFD ANNUAL FILERS

An annual filer is an official or employee of the state or a political subdivision with an annual operating budget of over $1 million that must disclose their financial interests by virtue of the position they hold.

See § 105.487(3), RSMo, for more information about annual PFD filers.

2.5.1 – 2027 ANNUAL PFD FILER DEADLINES

Annual filers who do not file by the deadline face $10 per day late fees. If a political subdivision has a conflict of interest ordinance and filing deadlines are not met, penalties (if any) are assessed by the political subdivision according to its ordinance.

- **Annual filers:** May 3, 2027.
- **Former officials and employees:** May 3, 2027.
- **Annual filers who are also candidate PFD filers:** the earliest filing deadline (whether annual or candidate).
- **Newly appointed or employed filers:** within 30 days of appointment or employment.

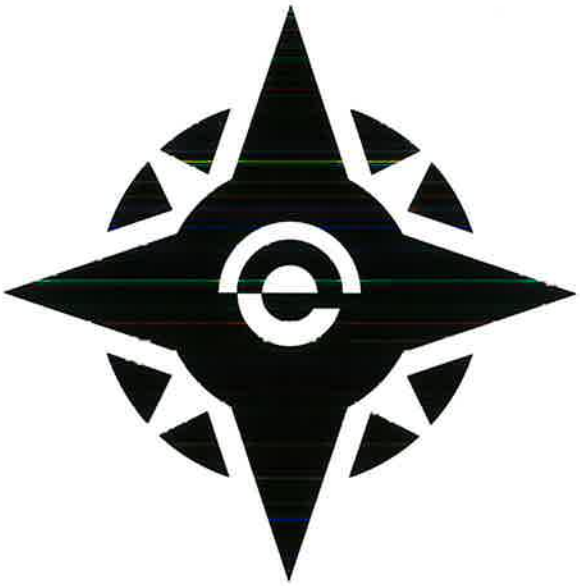
2.5.2 – ANNUAL FILER NOTIFICATION

In January of each year, the MEC informs individuals by mail that they have been identified as a PFD filer by their political subdivision. State law requires the agency or political subdivision to notify all individuals that have been designated as a decision making public servant by the subdivision (see § 105.450(6), RSMo, for the definition of designated decision making public servant).

To ensure receipt of the annual PFD filing reminder, former officials and employees should ensure that the state agency or political subdivision is able to provide personal contact information to the MEC.

2.5.3 – ANNUAL FILER REPORTING TIME PERIOD

- **Annual filers:** January 1 through December 31 of the prior calendar year.
- **Former officials and employees:** January 1 through the last day the individual held the annual filer position.
- **Newly appointed or employed filers:** January 1 through December 31 of the year prior to the date of appointment or employment.



Chapter 3: Campaign Finance Disclosure

In this chapter:

- Terms to Know
- Recordkeeping and Reporting for Non-Committees, Out-of-State Committees, and Federal PACs
- When and How to Establish a Committee
- Committee Reporting Requirements and Filing Deadlines
- Paid for By Disclosure
- Contribution Limits, Uses, and Restrictions
- Post-Election Guidelines

3.1 – TERMS TO KNOW

3.1.1 – WHAT IS CAMPAIGN FINANCE DISCLOSURE? – *Chapter 130, RSMo*

Campaign finance disclosure is required when individuals, groups, and committees, receives contributions (monetary or in-kind) and/or make expenditures (paid or incurred) to support or oppose candidates or ballot measures. The law requires recordkeeping and reporting of these activities. These disclosure requirements create transparency and accountability

3.1.2 – CONTRIBUTION – *§ 130.011(12), RSMo*

A donation of money (also known as a monetary contribution) or anything of value (also known as an in-kind contribution), given to support or oppose a candidate or ballot measure. Contributions include gifts, loans, and a candidate's own money used in support of their candidacy (with specific exceptions noted in the law).

3.1.3 – EXPENDITURE – *§ 130.011(17), RSMo*

A payment made to support or oppose a candidate or ballot measure. Expenditures must be recorded and reported at the time they are made or incurred. "Incurred expenditures" are expenses that a candidate or committee promises to pay in one reporting period but actually pays in another.

3.1.4 – COMMITTEE – *§ 130.011(7), RSMo*

A committee is a person or group of people who accepts contributions (monetary or in-kind) or makes expenditures (paid or incurred) to influence the action of voters by supporting or opposing candidates and/or ballot measures or to pay a previous campaign debt. Once money spent or received exceeds certain monetary thresholds, a committee must be formed and registered with the MEC. See 3.3 – When and How to Register a Committee.

3.1.5 – NON-COMMITTEE

Non-committees are individuals, businesses, groups, and other entities that do not meet the definition of a committee under Missouri law. Non-committees have recordkeeping and reporting requirements when engaging in campaign finance activity in Missouri. See 3.2 – Non-Committees, Out-of-State Committees, and Federal PACs.

3.2 – NON-COMMITTEES, OUT-OF-STATE COMMITTEES, AND FEDERAL PACS

In addition to reporting and attestation requirements, anyone soliciting contributions for a committee must include a disclaimer as part of their solicitation. See 3.6.4 – NEW THIS YEAR – Contribution Solicitations for more information.

3.2.1 – 48 HOUR BALLOT MEASURE EXPENDITURE ATTESTATION

Non-committees that spend any money to support or oppose a ballot measure must file an attestation statement with the MEC within 48 hours of making the expenditure(s). The individual or entity must attest that they have not accepted more than $10,000 from prohibited sources in the four-year period preceding the expenditure(s) and that it will not do so through the rest of the year in which the measure will appear on the ballot. See section 3.6.6 Contributions from Foreign Nationals for the definition of "prohibited sources."

To complete this attestation statement, go to the MEC's website and select the 48 Hour Ballot Measure Expenditure Attestation link in the Help Center box on the homepage.

3.2.2 – NON-COMMITTEE EXPENDITURE REPORT

Non-committees that are not accepting contributions from others but spend $500 or more in support of or in opposition to candidates or ballot measures in an election, must file a Non-Committee Expenditure Report within 14 days after total expenditures exceed $500. If additional expenditures are made after filing the initial report, a further report should be filed within 14 days; except if any such expenditure is made within 14 days before an election, the report must be filed within 48 hours.

To complete this report, go to the MEC's website and select the Campaign Finance tab. Select Forms from the right side of the screen. Then select the Non-Committee Expenditure Report.

3.2.3 – OUT-OF-STATE COMMITTEES AND FEDERAL PACS – *§ 130.021.10, RSMo, and Mo. Const. Art. III, § 2(f)*

Missouri law defines certain federal political action committees (PACs) (registered with the Federal Election Commission (FEC)) and out-of-state committees (committees registered in other states). Federal PACs and out-of-state committees must register a Missouri committee and file reports if:

- The aggregate of all contributions received from persons domiciled in Missouri exceeds 20% in total dollar amount of all funds received by the committee in the preceding 12 months; or
- The aggregate of all contributions and expenditures made by the committee or PAC to support or oppose candidates and ballot measures in Missouri exceed $1,500 in the current calendar year; or
- The federal PAC contributes to a candidate for the Missouri General Assembly.

See 1 CSR 50-5.010 and 1 CSR 50-5.020 for more information.

3.3 – WHEN AND HOW TO REGISTER A COMMITTEE

3.3.1 – TYPES OF MISSOURI CAMPAIGN FINANCE COMMITTEES – *§ 130.011, RSMo*

- **Campaign committee:** Formed to support or oppose ballot measures or judicial retention.
- **Candidate committee:** Formed by a single candidate for office in a specific election.
    - **Debt service committee:** A candidate committee converted to retire committee debt.
    - **Exempt candidate:** A candidate for statewide office, the General Assembly, or a municipal office in a city with a population of over 100,000 who is not required to form and register a candidate committee with the MEC because their campaign finance activity has not exceeded certain thresholds (See section – 3.3.2 When to Register a Candidate Committee for more information.) Such candidates have more limited campaign finance disclosure requirements.
    - **Exploratory committee:** Formed to receive and spend money to determine whether an individual will seek public office.
- **Continuing committee (also known as a political action committee or PAC):** Formed to remain in existence beyond any one election or ballot issue and directed by someone other than a candidate.
- **Political party committee:** Formed as a campaign finance committee of a political party.

3.3.2 – WHEN TO REGISTER A CANDIDATE COMMITTEE – *§§ 130.016 and 130.021, RSMo*

Committee registration requirements differ depending on the office for which the candidate is running. Read carefully to determine your registration requirement.

CANDIDATES FOR STATEWIDE OFFICE, GENERAL ASSEMBLY, OR CITY OFFICE IN A MUNICIPALITY WITH A POPULATION OVER 100,000

Candidates for these positions must either register a candidate committee or as an exempt candidate.

- **Question 1:** Have you received more than $325 from a single contributor other than yourself?
    - **If yes:** Register a candidate committee.
    - **If no:** Continue to question 2.
- **Question 2:** Have you made expenditures totaling over $500?
    - **If yes:** Register a candidate committee.
    - **If no:** Continue to question 3.
- **Question 3:** Have you received over $500 in contributions from others?
    - **If yes:** Register a candidate committee.
    - **If no:** Register as an exempt candidate.

CANDIDATES FOR SMALLER, LOCAL OFFICES

Other candidates, including those for county office, cities with a population under 100,000, school board, etc. must register a candidate committee if campaign finance activity exceeds certain thresholds.

- **Question 1:** Have you received more than $325 from a single contributor other than yourself?
  - **If yes:** Register a candidate committee.
  - **If no:** Continue to question 2.
- **Question 2:** Have you spent over $1,000 of your own money or is your total activity (contributions + expenditures) over $1,000?
  - **If yes:** Register a candidate committee.
  - **If no:** You are not required to register a committee. Keep records of all campaign finance activity.

3.3.3 – WHEN TO REGISTER A PAC, POLITICAL PARTY, OR CAMPAIGN COMMITTEE

Anyone other than a candidate should ask themselves the following questions to determine whether to register a committee or file a non-committee expenditure report with the MEC.

- **Question 1:** Are you accepting contributions from others?
  - **If yes:** Continue to question 2.
  - **If no:** Have you made expenditures over $500?
    - **If yes:** File a *Non-Committee Expenditure Report*.
    - **If no:** You are not required to register a committee. Keep records of all campaign finance activity.
- **Question 2:** Have you accepted more than $250 from a single contributor or spent more than $250 of your own money?
  - **If yes:** Register a committee.
  - **If no:** Continue to question 3.
- **Question 3:** Do your total contributions received exceed $500?
  - **If yes:** Register a committee.
  - **If no:** Continue to question 4.
- **Question 4:** Do your total expenditures exceed $500?
  - **If yes:** Register a committee.
  - **If no:** You are not required to register a committee. Keep records of all campaign finance activity.

Note: Upon registering a PAC, campaign, or political party committee, the treasurer must certify that no preliminary activity was funded by prohibited sources (see § 130.170, RSMo, for definitions of "preliminary activity" and "prohibited sources).

3.3.4 – COMMITTEE PREPARATION CHECKLIST

Upon deciding to form a committee or upon meeting the thresholds for forming a committee, one must:

- ☐ Select a committee name. Candidate committees must incorporate the name of the candidate
- ☐ Select a committee treasurer.
- ☐ Open a committee bank account.
- ☐ File a Statement of Committee Organization with the MEC.
- ☐ Research and create a plan for thorough recordkeeping.
- ☐ Review contribution limits and restrictions on receiving and making contributions.
- ☐ Research proper use of campaign contributions.
- ☐ Add reporting deadlines to your calendar.
- ☐ File all required reports by the deadline.
- ☐ Take advantage of free MEC resources and training.
- ☐ Amend your committee's information as necessary.
- ☐ Understand your committee's options and requirements after the election.

3.3.5 – TREASURER AND DEPUTY TREASURER REQUIREMENTS – *§ 130.021.1, RSMo*

- Committee treasurers must reside in Missouri.
- Committee treasurers must reside in the district, or any county in which the committee sits. See Advisory Opinion 2008.10.CF.009 for more information.
- Treasurers of candidate committees must reside in the candidate's district or any county which contains a portion of the district.
- Treasurers of candidate committees must be appointed by the candidate. The candidate may serve as committee treasurer.

3.3.6 – BANK ACCOUNT REQUIREMENTS – *§ 130.021.4, RSMo*

To complete the registration process, every committee must open an official bank account which is:

- Held in the committee's name, as it will be registered.
- At one federal or state-chartered bank, savings and loan association, or credit union in Missouri.
- A negotiable draft type of account.
- Able to provide records of deposits, canceled checks, and any other account of campaign finance activity.
- Not commingled with any other funds or bank account that has non-committee funds.

If the committee chooses to use a committee credit card, the committee must pay the credit card bill through the committee's official bank account. The committee must disclose the issuer and account number of its credit card on the Statement of Committee Organization.

3.3.7 – REGISTERING A COMMITTEE – *§ 130.021.5, RSMo*

All committees (except local campaign committees) must register with the MEC by filing a Statement of Committee Organization within 20 days of becoming a committee, but no later than the deadline for filing the first disclosure report the committee would be required to file.

Local campaign committees must register and file campaign finance reports on paper with their local election authority. If the committee would prefer to electronically file reports with the MEC in lieu of paper reports with their local election authority, they must file a Statement of Committee Organization with the MEC. Such committees must then file all campaign finance disclosure reports electronically with the MEC.

NOTE – CONTRIBUTIONS OVER $5,000

All committees, including local campaign committees, must register with the MEC and file the *48 Hour Report of Contribution over $5,000 Received* within 48 hours of receiving a single monetary or in-kind contribution or loan of over $5,000. This includes monetary and in-kind contributions given to one's own committee.

3.3.8 – AMENDING COMMITTEE INFORMATION – *§ 130.021.7, RSMo*

File an amended Statement of Committee Organization within 20 days after a change occurs, but no later than the deadline of the next required report. To amend your Statement of Committee Organization:

1. Locate the Statement of Committee Organization form under Campaign Finance.
2. Make any necessary changes to the committee's information.
3. The treasurer and candidate (if applicable) must sign the statement.
4. Submit to the MEC via mail, email, fax, or hand-delivery.

3.3.9 – CONNECTED ORGANIZATIONS

A corporation or labor organization may establish a continuing committee (PAC) which may accept contributions or dues from members, officers, directors, employees, or security holders.

- In Advisory Opinion 2017.03.CF.010, the Commission stated that a corporation or labor organization may not contribute its own treasury funds to its connected continuing committee (PAC); it may contribute its own funds to an unconnected continuing committee (PAC).
- In Advisory Opinion 2017.07.CF.014, the Commission discussed connected organizations and how a corporation's status under the campaign finance laws is impacted under Mo. Const. Art. VIII, § 23.

3.4 – COMMITTEE REPORTING REQUIREMENTS AND FILING DEADLINES

- **Quarterly reports:** All committees must file quarterly disclosure reports no later than the 15th day following the close of each calendar quarter. These reports are due until the committee terminates (§ 130.046.1(3), RSMo).
- **40 Day Before Election Report:** This report is only required if the committee accepted contributions, made contributions, or made/incurred expenditures for the election (§ 130.046.1, RSMo).
- **8 Day Before Election Report:** This report is only required if the committee made contributions or made/incurred expenditures for the election (§ 130.046.1(1), RSMo).
- **30 Day After Election Report:** This report is only required if the committee made contributions or made/incurred expenditures for the election. Successful candidates must file this report before taking office. If committee debt exceeds $1,000, the committee may not file a Statement of Limited Activity for this report (§§ 130.046.1(2) and 130.046.5(2), RSMo).
- **48 Hour Report of Contribution over $5,000:** Any individual or committee that receives a single contribution valued at more than $5,000 must electronically report the contribution to the MEC within 48 hours of receipt. This contribution must also be included in the committee's next filed report (§ 130.044.1, RSMo).
- **24 Hour Notice of Late Contribution Received:** Any committee that receives a single contribution valued at more than $250 less than 12 days before an election must report the contribution to the MEC within 24 hours of receipt. This contribution must also be included in the committee's next filed report (§ 130.050.3, RSMo).
- **24 Hour Late Expenditure Report:** Each time a PAC aggregates more than $250 in expenditures made or incurred (not including contributions made to candidates or other committees) less than 12 days before an election, the PAC must file a full disclosure report within 24 hours. If not filed timely, late fees of $10 per day are assessed by the MEC (§130.046.3(2), RSMo).
- **48 Hour Ballot Measure Expenditure Attestation:** Any time a committee makes an expenditure supporting or opposing a ballot measure, the committee must affirm within 48 hours that the committee has not accepted funds over $10,000 from prohibited sources in the past four years and will not do so through the calendar year in which the measure will appear on the ballot (§ 130.176.3, RSMo).

3.4.1 – LATE FEES – *§ 105.963, RSMo*

If a committee report is not received by the MEC by the deadline, committees are assessed a minimum $10 per day late fee. If the report is not filed within 30 days, the late fee increases to $100 per day, not to exceed $3,000 per report. Candidate committees that do not timely file the *8 Day Before Election Report* receive a $100 per day late fee through election day.

3.4.2 – WEEKEND AND HOLIDAY EXTENSIONS – *§ 105.964, RSMo*

If the deadline for filing a report falls on a Saturday, Sunday, or an official holiday, the deadline is extended to the next business day. However, this extension does not apply to any reports or disclosures due less than eight days before an election, in which case there are no extensions.

3.4.3 – TIME PERIOD COVERED BY REPORTS – *§§ 130.046.5(2) and 130.046.4, RSMo*

Whether filing a full disclosure report or statement of limited activity, the time period covered begins the day after the closing date for the committee's last full disclosure report and ends on the closing date determined by statute for the current report. A full disclosure report discloses the details of a committee's campaign finance activity during this period.

Example: A committee filed a full disclosure report for the October Quarterly Report, which disclosed activity through September 30. The committee then filed a statement of limited activity for the January Quarterly Report. If the committee were to then file a full disclosure report for the April Quarterly Report, the report would disclose all campaign finance activity from October 1 – March 31. This ensures that each day is accounted for in a committee's full disclosure reports.

3.4.4 – MANDATORY QUARTERLY REPORT DEADLINES – *§130.046.1(3), RSMo*

REPORT TITLE	CLOSING DATE	DEADLINE
January Quarterly Report	December 31, 2026	January 15, 2027
April Quarterly Report	March 31, 2027	April 15, 2027
July Quarterly Report	June 30, 2027	July 15, 2027
October Quarterly Report	September 30, 2027	October 15, 2027

Note: In 2027, the January Quarterly Report is optional. All other quarterly reports are mandatory.

3.4.5 – 2027 ELECTION-SPECIFIC REPORTS

FEBRUARY 2, 2027, ELECTION

REPORT TITLE	CLOSING DATE	DEADLINE
40 Day Before Election Report	December 19, 2026	December 24, 2026
8 Day Before Election Report	January 21, 2027	January 25, 2027
30 Day After Election Report	February 27, 2027	March 4, 2027

MARCH 2, 2027, ELECTION

REPORT TITLE	CLOSING DATE	DEADLINE
40 Day Before Election Report	January 16, 2027	January 21, 2027
8 Day Before Election Report	February 18, 2027	February 22, 2027
30 Day After Election Report	March 27, 2027	April 1, 2027

APRIL 6, 2027, ELECTION

REPORT TITLE	CLOSING DATE	DEADLINE
40 Day Before Election Report	February 20, 2027	February 25, 2027
8 Day Before Election Report	March 25, 2027	March 29, 2027
30 Day After Election Report	May 1, 2027	May 6, 2027

AUGUST 3, 2027, ELECTION

REPORT TITLE	CLOSING DATE	DEADLINE
8 Day Before Election Report	July 22, 2027	July 26, 2027
30 Day After Election Report	August 28, 2027	September 2, 2027

NOVEMBER 2, 2027, ELECTION

REPORT TITLE	CLOSING DATE	DEADLINE
8 Day Before Election Report	October 21, 2027	October 25, 2027
30 Day After Election Report	November 27, 2027	December 2, 2027

3.5 – PAID FOR BY DISCLOSURE

3.5.1 – WHICH CAMPAIGN MATERIALS REQUIRE A "PAID FOR BY"? – *§ 130.031.8, RSMo*

Any person[2] publishing, circulating, or distributing printed campaign material relative to any candidate or ballot measure within Missouri must comply with paid for by disclosure requirements.

The following printed materials must display a paid for by disclosure: flyers, signs (including those for display on vehicles), advertisements, pamphlets, door hangers, business cards, sample ballots, other imprinted or lettered materials.

3.5.2 – WHAT IS EXCLUDED FROM "PAID FOR BY" DISCLOSURE REQUIREMENTS?

The following materials do not require a paid for by disclosure:

- Certain items of personal use, given away or sold, are obvious in their identification with a specific candidate or committee, and the cost of which is reported in campaign finance reports.
- A sign that is personally printed or constructed by an individual without compensation and displayed at that individual's place of residence or on their personal motor vehicle.
- A news story, commentary, or editorial printed by a regularly published newspaper or other periodical without charge to a candidate, committee, or any other person.

3.5.3 – NOT REGULATED BY THE MEC

The MEC does not regulate sign placement. Review local ordinances for information on when and where signs may be placed. Review the Missouri Department of Transportation's policies for guidance on unauthorized signs.

Those who are transmitting information about candidates or ballot measures through television or radio must provide sponsor identification in accordance with federal laws. Federal law also provides sponsor identification guidance for those who are printing material or broadcasting about federal candidates.

[2] See § 130.011(23), RSMo, for the full definition of "person," which is broader than individuals.

3.5.4 – PROPER "PAID FOR BY" DISCLOSURE

The disclosure must use the full name of the person. Use of abbreviations or acronyms, including for committee names, is prohibited.

WHO PAID FOR THE MATERIAL?	REQUIRED INFORMATION FOLLOWING THE WORDS "PAID FOR BY"	EXAMPLE
Candidate from personal funds (only if no candidate committee exists) *§ 130.031.8(1), RSMo*	Fist and last name by which the candidate is known (not "Paid for by candidate.")	Paid for by Jane Smith.
Committee *§ 130.031.8(2), RSMo*	The name of the committee as required to be registered and the name and title of the committee treasurer who was serving when the material was paid for	Paid for by Committee to Elect Jane Smith, John Davis, Treasurer.
Corporation, business entity, labor organization, political subdivision, or other organization (not a committee and not organized for influencing elections)) *§ 130.031.8(3), RSM*	Name of the entity, the name of the principal officer of the entity, by whatever title known, and the mailing address of the entity (or, if the entity has no mailing address, the mailing address of the principal officer)	Paid for by Rock Corporation, John Davis, Chief Financial Officer, 888 Main Street, Jefferson City, MO 65109.
One to five individual(s) *§ 130.031.8(4), RSMo*	Name of the individual(s) and their respective mailing address	Paid for by Jane Smith, 200 Anyplace Street, Jefferson City, MO 65109.
More than five individuals *§ 130.031.8(4), RSMo*	"For a list of other sponsors, contact:" followed by the name and address of one individual responsible for causing the matter to be printed and who will keep a record of the names and amounts paid by other individuals.	Paid for by: For a list of other sponsors, contact: John Davis, 8525 Sappington Road, Jefferson City, MO 65101.

3.6 – CONTRIBUTION LIMITS AND RESTRICTIONS

3.6.1 – CONTRIBUTION LIMITS – *Mo. Const. Art. VIII, § 23 and Mo. Const. Art. III, § 2*

The Missouri Constitution imposes the following contribution limits on candidates for statewide office and the General Assembly:

- **Statewide office** (Governor, Lieutenant Governor, Secretary of State, State Treasurer, State Auditor, Attorney General, state judicial office): $3,225 (*effective January 1, 2027*)[3]
- **State Senator:** $2,400
- **State Representative:** $2,000

Candidate committees for statewide office and General Assembly may accept up to the relevant contribution limit from each contributor for each election cycle. A primary election and the succeeding general election are considered two separate elections. In Advisory Opinion 2017.04.CF.012, the Commission advised that a candidate committee cannot receive contributions for the candidate's general election until after their primary election.

The Missouri Constitution and statutes do not impose contribution limits on all candidates for local office. However, some political subdivisions have enacted contribution limits for candidates within their jurisdiction. Candidates for local office should contact their political subdivision to determine whether they must abide by any local contribution limits.

3.6.2 – POLITICAL PARTY CONTRIBUTION LIMITS – *Mo. Const. Art. VIII, §23.3(2)*

Effective January 1, 2027, political parties may accept aggregate contributions of $31,425 per election from persons or committees. The aggregate applies to the party committees at the state, county, municipal, district, ward, and township levels combined.

3.6.3 – CONTRIBUTION RESTRICTIONS

Mo. Const. Art. VIII, § 23, restricts the ability of certain committees to accept contributions from corporations, labor organizations, and other committees. The Constitution imposes criminal penalties for violations of these provisions. Chapter 130, RSMo, contains other contribution restrictions enacted by the General Assembly. Different committee types have different contribution restrictions:

[3] See the Missouri Ethics Commission's website for the most up-to-date contribution limits.

- **Candidate committees (including exploratory and debt service committees)** may not accept contributions from:
    - Any natural person who is not a United States citizen.
    - A foreign government.
    - Corporations or labor organizations.
    - Other candidate committees.
    - Any federal or out-of-state PAC contributing more than $1,500 and that has not registered with the MEC. General Assembly candidates may not accept any contributions from federal PACs that are not registered with the MEC.
- **Campaign committees** may not accept contributions from:
    - Any natural person who is not a United States citizen.
    - A foreign government.
    - A foreign national or prohibited source.
    - Those that received more than $10,000 from prohibited sources (monetary and in-kind contributions) or foreign nationals (in-kind contributions) in the four years preceding the date of the contribution.
- **PACs** may not accept contributions from:
    - Any natural person who is not a United States citizen.
    - A foreign government.
    - Political party committees.
    - Candidate committees (including exploratory committees and debt service committees)
    - Campaign committees.
    - Any corporations, associations, or partnerships that do not have authority to transact business in Missouri.
    - Any federal or out-of-state PAC contributing more than $1,500 and that has not registered with the MEC.
    - A foreign national or prohibited source.
    - Those that received more than $10,000 from prohibited sources (monetary and in-kind contributions) or foreign nationals (in-kind contributions) in the four years preceding the date of the contribution.
- **Political party committees** may not accept contributions from:
    - Any natural person who is not a United States citizen.
    - A foreign government.
    - Corporations or labor organizations.
    - Any federal or out-of-state PAC contributing more than $1,500 and that has not registered with the MEC.
    - A foreign national or prohibited source.
    - Those that received more than $10,000 from prohibited sources (monetary and in-kind contributions) or foreign nationals (in-kind contributions) in the four years preceding the date of the contribution.

For more information about restrictions on contributions from corporations or labor organizations, see 3.6.7 – Contributions from Limited Liability Companies and Corporations. For more information about restrictions on contributions from foreign nationals, see 3.6.6 – Contributions from Foreign Nationals.

3.6.4 – NEW THIS YEAR – CONTRIBUTION SOLICITATIONS – *§§ 130.034.13, 130.034.14, RSMo*

In 2026, the General Assembly passed House Bill 1871, imposing new disclosure requirements on those soliciting contributions and committees soliciting recurring contributions. For more information about solicitation disclosure and recurring contribution requirements, see the MEC's 2026 Legislative Update.

ALL SOLICITATIONS

Effective August 28, 2026, all contribution solicitations[4] must state, in a clear and conspicuous manner, the name of the committee that will benefit from any funds received because of the solicitation. Anyone soliciting contributions must identify the committee(s) that will receive all of, or a portion of, contributions received as a result of the solicitation. For example, a candidate soliciting contributions solely to support their candidate committee must disclose the name of the committee that will benefit from the contributions. Those soliciting contributions to support multiple committees must disclose the identity of each committee that will be supported.

Furthermore, all solicitations must indicate what percentage of each contribution will be received by the committee and what percentage of each contribution will be received by any other entity.

If a contribution is solicited using a service with a fee-based or commission-based payment structure, the service provider often receives a set percentage of contributions received using the service. Common examples of service providers with a fee-based or commission-based payment structure may include, but are not limited to, online fundraising platforms, consulting groups, and other fundraising services. The solicitation disclosure must clearly inform potential contributors that the business or entity will receive a portion of the person's contribution. The MEC does not interpret this language to require those soliciting contributions to pre-determine and disclose where they intend to spend funds received because of the solicitation, other than entities that are guaranteed a set portion of the specific contribution.

For example, if a committee utilizes an online fundraising platform which automatically deducts 5% of contributions received by the committee on the platform, the committee must clearly inform contributors that the committee will receive 95% of the person's contribution and the online fundraising platform will receive 5% of the person's contribution to the committee. The new solicitation disclaimer requirement does not change any reporting requirements. On a campaign finance report, the committee will still report the full amount intended by the contributors as monetary contributions and disclose any fees as expenditures.

Some online fundraising platforms allow contributors to elect to cover the cost of the platform's fee, allowing 100% of the contributor's monetary contribution to go directly to the committee. Those soliciting contributions should carefully consider the specific fee structure employed by their online fundraising platform when crafting their solicitation disclosure. Ensure contributors are aware of their options. Additionally, please note that if a contributor elects to cover the cost of an online fundraising

[4] Connected organizations of a PAC are exempt from this solicitation disclosure.

platform fee, the cost of the fee is considered an in-kind contribution and must be included in a committee's campaign finance report and any contribution limit calculations.

RECURRING CONTRIBUTIONS

In addition to the standard solicitation disclosure, committees soliciting recurring contributions may only accept such contributions if the contributor gives affirmative consent for the recurring contributions. Passive action, such as failing to uncheck a pre-checked box authorizing recurring contributions, does not constitute affirmative consent.

Recurring contributions made to support or oppose a candidate or ballot measure must automatically end after the election at which the candidate or measure appeared on the ballot. Recurring contributions made to support a candidate who wins their primary election may continue until the candidate's general election.

After each recurring contribution, the committee must provide the contributor with a receipt for the contribution. The receipt must include the following information:

- The frequency of recurring contribution.
- The duration of the recurring contribution. If the contribution is in support of candidate in a primary election, consider how duration may differ depending on whether the candidate is successful in their primary election.
- Instructions for how to cancel recurring contributions.

If a contributor requests to cancel their recurring contribution, the committee must stop any future scheduled contributions prior to the next scheduled deduction date. Contributions solicited in violation of this section must be immediately returned in full to the contributor. The MEC may impose a civil penalty of up to 100 times the amount of contributions received in violation of this subsection.

Whenever possible, research online fundraising platforms in advance to ensure that your committee can comply with solicitation disclosure requirements and recurring contribution receipt requirements within the confines of the platform.

3.6.5 – CONTRIBUTION USAGE – *§ 130.034, RSMo*

Campaign contributions may never be used for personal expenses. Contributions may be used for any purpose allowed by law, including, but not limited to:

- Expenses related to a campaign.
- Expenses incurred in connection with the duties of elected office.
- Expenses pertaining to the entertainment of or providing social courtesies to constituents, professional associations, or other elected officials.
- The return of a contribution to the original contributor.
- Contributions to a political organization as allowed by law. See 3.6.1 Contribution Restrictions for more information.
- Establishing a new committee.
- Unconditional gifts to any charitable, fraternal, or civic organization or other association
- Payment of any reasonable attorney's fees accrued by a person who is the subject of a complaint and/or investigation arising from holding or running for public office (see Advisory Opinion 2018.10.CF.005 for more information).
- **NEW THIS YEAR:** childcare expenses resulting directly from campaigning for or holding elected office. No childcare expenses may be paid to a member of the candidate/officeholder's household.
- **NEW THIS YEAR:** personal security for elected officeholders.

Lobbyists maintaining or dissolving a candidate committee have other restrictions on contribution usage See section 5.5.1 NEW THIS YEAR – Lobbyists Running for Office for more information

3.6.6 – CONTRIBUTIONS FROM FOREIGN NATIONALS – *§§ 130.170 – 130.188, RSMo*

IMPORTANT DEFINITIONS

- **Foreign national - § 130.170(3), RSMo:** Any of the following:
  - An individual who is not a citizen or lawful permanent resident of the United States.
  - A government, or subdivision, of a foreign country or municipality thereof.
  - A foreign political party.
  - Any entity organized under the laws of, or with its principal place of business in, a foreign country.
  - Any entity organized under the laws of the United States or any state thereof that is wholly or majority owned by a person or entity described above, unless:
    - Any contribution or expenditure it makes derives entirely from funds generated by the entity's United States operations; and
    - All decisions concerning the contribution or expenditure are made by individuals who are United States citizens or lawful permanent residents, except for setting overall budget amounts.
- **Prohibited sources - § 130.170(6), RSMo:** Contributions from or expenditures by a foreign national made with the intent to use such funds to influence an election on a ballot measure.

RESTRICTIONS ON CONTRIBUTIONS RECEIVED

PACs, campaign committees, and political party committees may not accept contributions from:

- Foreign nationals.
- Prohibited sources.
- Contributors that received more than $10,000 in contributions from prohibited sources (monetary and in-kind contributions - § 130.176.2, RSMo) in the four years preceding the date of the contribution.
- Contributors that received more than $10,000 in funds from foreign nationals (in-kind contributions - § 130.176.5, RSMo) in the four years preceding the date of the contribution.

COLLECTING CONTRIBUTOR AFFIRMATION STATEMENTS

PACs, campaign committees, and political party committees must also, at a minimum, obtain affirmation statements from contributors giving over $2,000, that the contributor is not a foreign national and has not accepted over $10,000 from prohibited sources in the two-year period (for individual contributors) or four-year period (for other contributors) preceding the date the contribution was made.

However, these committees must attest on each campaign finance report that the contributor associated with *every* contribution (regardless of amount) is not a foreign national and has not received contributions from prohibited sources over $10,000 in the *four-year period* preceding the date the contribution was made (regardless of contributor identity). The MEC recommends collecting this affirmation for every contribution received.

Note: A committee's first campaign finance report will include any contributions received and expenditures made prior to registration. Therefore, anyone raising or spending money to support or oppose a ballot measure is encouraged to collect affirmations from contributors to satisfy the committee-level reporting requirements in § 130.176.2, RSMo.

48 HOUR BALLOT MEASURE EXPENDITURE ATTESTATION

Per § 130.176.3, RSMo, any time a committee or other entity makes an expenditure supporting or opposing a ballot measure, it must, within 48 hours, affirm to the MEC that it has not accepted over $10,000 from prohibited sources in the four years preceding the date of the expenditure and will not do so through the remainder of the calendar year in which the measure will appear on the ballot.

Committees file the new 48 Hour Ballot Measure Expenditure Attestation in the campaign finance electronic filing system. Entities other than committees may file this attestation on the MEC's website.

FOREIGN NATIONAL RESTRICTIONS

A foreign national:

- Shall not make an in-kind expenditure for the purpose of supporting or opposing any ballot measure (§ 130.176.5, RSMo).
- May not direct, dictate, control, or participate in the decision-making process of any person regarding that person's activities to influence an election on a ballot measure (§ 130.179.1, RSMo).
- May not solicit the making of a contribution or expenditure by another person to influence an election on a ballot measure (§ 130.179.2, RSMo).

3.6.7 – CONTRIBUTIONS FROM LIMITED LIABILITY COMPANIES AND CORPORATIONS – *Mo. Const. Art. VII, § 23.3(16) and § 130.029.4, RSMo*

Limited liability companies (LLCs) and corporations must abide by the following rules when making contributions:

LLCs without corporate tax status may contribute to any Missouri campaign finance committee, if the LLC meets the following conditions:

- The LLC has existed for at least one year.
- The LLC has registered with the Missouri Secretary of State.
- The LLC is a legitimate business with a legitimate business interest and is not created solely to make campaign contributions.
- The LLC has registered with the MEC using the LLC electronic filing system. After creating an account, users can register existing LLCs with the MEC. Only a member or manager of an LLC (or equivalent for foreign LLCs), may attest that the LLC meets all the above conditions.

Corporations and LLCs with corporate tax status have no requirement to register with the MEC, and do not need to exist for any length of time prior to contributing. Keep the following restrictions in mind:

- Candidate committees may not receive contributions from corporations or LLCs with corporate tax status.
- Corporations and LLCs with corporate tax status that do not hold valid certificates of authority to transact business in this state may only contribute to campaign committees and may not contribute to other types of campaign finance committees.

When receiving a contribution, committees may use the MEC's LLC Campaign Finance Registration Search to check an LLC's registration status. Do not assume an LLC that is not registered with the MEC has a corporate tax status. The MEC recommends verifying this information with the LLC.

Committees can reject a contribution within 10 business days and return the contribution to the donor. Any contribution not returned within this time must be disclosed in the committee's next report.

See Advisory Opinions 2017.02.CF.005, 2017.02.CF.006 and 2017.03.CF.009 for additional information.

3.6.8 – USING THE LLC CAMPAIGN FINANCE REGISTRATION SYSTEM

CREATING AN ACCOUNT

1. Select LLC Campaign Finance Registration in the Help Center box on the MEC homepage.
2. Select "Create Account".
3. Enter all required information, including the email address and password you will use to login to the LLC Campaign Finance Registration System.

REGISTERING AN LLC

1. Upon logging in, select Add LLC Statement and search for the LLC by entering its charter number or any part of the LLC's name. If you do not see your LLC in the search results, please contact the MEC and provide the LLC's name and charter number.
2. Select Start next to the LLC. If the LLC has already been registered with the MEC, a green message will appear, showing the filing date. Missouri LLCs that have existed less than a year will display a gray Ineligible LLC message.
3. The LLC's member or manager must attest that the LLC meets all the requirements to make contributions to Missouri committees.

Once registered an LLC will immediately appear in the MEC's LLC Campaign Finance Registration Search.

3.7 – POST-ELECTION GUIDELINES FOR CANDIDATE AND CAMPAIGN COMMITTEES

3.7.1 – SUCCESSFUL CANDIDATES

- Before being sworn-in, successful candidates must file any outstanding campaign finance reports, including the 30 Day After Election Report (if the committee made expenditures and/or contributions for the election).
- After the general election, file an amended Statement of Committee Organization, updating the candidate's election information.
- Successful candidate committees may use committee funds for necessary and ordinary expenses in connection with the duties of office.
- Successful candidates may terminate their committee at any time.

3.7.2 – UNSUCCESSFUL CANDIDATES

- If the committee has more money on hand than debt, the committee must terminate within 30 days of the general election.
- If the committee has more debt than money on hand, it can convert to a debt service committee. Once committee debt is retired, the debt service committee must terminate.

3.7.3 – CAMPAIGN COMMITTEES

- If the committee has more money on hand than debt, the committee must terminate within 30 days of the election.
- If the committee has more debt than money on hand, the committee must retire its debt, then terminate.

3.7.4 – TERMINATING A COMMITTEE

1. Resolve committee indebtedness.
2. Distribute any remaining committee funds.
3. Close the committee's bank account.
4. File a full disclosure report containing the Termination Statement within ten days of the committee's dissolution (within 30 days of dissolution for debt service committees). The committee's final report should reflect a $0 balance for money on hand and indebtedness. The Termination Statement will include the contact information for the person who will preserve the committee's records and reports.
5. Preserve committee records for at least three years after the election or the last report to which the records pertain.



Chapter 4: Conflict of Interest

In this chapter:

- What is Governmental Conflict of Interest?
- Providing Services and Conducting Business
- Employment and Compensation
- Decision-Making
- Use of Public Funds
- Governmental Nepotism

4.1 – WHAT IS GOVERNMENTAL CONFLICT OF INTEREST?

§§ 105.450 – 105.467, RSMo

A conflict of interest is generally defined as a conflict between the private interests and official responsibilities of a person in a position of trust (Merriam-Webster). The Commission enforces specific laws that define conflicts of interest for public officials and employees.

These laws prohibit public officials and employees, their spouses, and dependent children from realizing a personal gain by virtue of their office or position. In some circumstances, these prohibitions also apply to their businesses. These laws also include restrictions on receiving additional compensation via employment, providing services, or conducting business with the political subdivision, and acting to influence decisions that could result in financial benefit.

4.2 – PROVIDING SERVICES AND CONDUCTING BUSINESS

§§ 105.454, 105.456, 105.458, RSMo

Generally, officials and employees may not do business with the state or the political subdivision they serve in an amount greater than $500 per transaction or $5,000[5] per year unless there is public notice, competitive bidding, and the official or employee is the lowest bidder. The prohibition covers the provision of services and the selling, renting, or leasing of property. These restrictions also apply to school district officials and employees.

Statewide officeholders and officials who are members of any legislative body are also prohibited from doing business with the state or political subdivision via a business entity in an amount greater than $500 per transaction or $5,000[4] per year unless there is public notice, competitive bidding, and the official or employee is the lowest bidder. This prohibition applies to sole proprietorships and entities where the official holds a 10% ownership interest.

Some of these provisions may extend to the official/employee's spouse, dependent children, and/or associated business. See §§ 105.454 – 105.458, RSMo, for more information.

[5] For the General Assembly and statewide officeholders, the annual limit is $1,500.

4.3 – EMPLOYMENT AND COMPENSATION

§§ 105.454, 105.456, 105.458, 105.462, RSMo

Generally, certain elected and appointed officials, and some employees of the state or a political subdivision, cannot be employed in another capacity by the public entity in which they serve. Additionally, these officials and employees cannot be paid by a third party to influence a decision of the state or political subdivision in which they serve.

There are also statutory provisions that prevent some former officials and employees from accepting compensation to attempt to influence a decision of the state or political subdivision that they formerly served. Officials with rulemaking authority are similarly prohibited, and they are also prohibited from doing business for a year with any entity that participated in a proceeding before that official in the preceding year.

4.4 – DECISION-MAKING

§§ 105.452, 105.454, 105.462, RSMo

No public official or state/subdivision employee may act officially (or refrain from acting officially) in exchange for any payment, officer/promise to pay, or receipt of anything of value. This includes payments to third persons, gifts, and campaign contributions. Additionally, they may not offer, promote, or advocate for a political appointment in exchange for anything of value to any political subdivision.

Public officials and employees cannot make decisions that may financially impact themselves or their family when the vote would provide them, their spouse, or dependent child a "special monetary benefit" which is not provided to everyone in the same class. See § 105.452, RSMo, for more information and the definition of a special monetary benefit. Public officials and employees are also prohibited from realizing a gain from the use or disclosure of confidential information.

Officials and employees serving in an executive or administrative capacity or with rulemaking authority may not attempt to influence decisions of the political subdivision that may financially benefit themselves, their spouse, dependent child, or associated business[6] unless the political subdivision provides public notice, offers competitive bidding, and requires the official or employee's bid to be the lowest bid received.

[6] Via the performance of a service, or the sale, rental, or lease of property in an amount over $500 per transaction or $5,000 per year.

4.5 – USE OF PUBLIC FUNDS

§§ 115.013 and 115.646, RSMo

No contribution or expenditure of public funds can be made by an officer, employee, or agent, of a political subdivision, special district, or charter school to advocate, support, or oppose any ballot measure or candidate for public office.

Public officials may make public appearances and issue press releases related to ballot measures.

4.5.1 – NEW THIS YEAR – USE OF PUBLIC AND RETIREMENT SYSTEM FUNDS

In 2026, the Missouri General Assembly passed House Bill 1871, which extended public funds restrictions to special districts in addition to political subdivisions and charter schools. Per § 115.013(26), RSMo, special districts include "any school district, water district, fire protection district, hospital district, health center, nursing district, or other districts formed pursuant to the laws of Missouri to provide limited, specific services."

Furthermore, the General Assembly passed Senate Bill 1572, which added § 105.695, RSMo, preventing any public pension system from making contributions or expenditures to support or oppose a candidate or ballot measure using system funds. This restriction extends to any retirement system established by the state of Missouri or any political subdivision or instrumentality of the state for the purpose of providing plan benefits for elected or appointed officials or employees of the state or any political subdivision or instrumentality of the state. Retirement systems and their employees may educate and inform members and the public about potential impacts to the system through regular system programs, processes, and job duties.

4.6 – GOVERNMENTAL NEPOTISM

Mo. Const. Art. VII, § 6

The Missouri Constitution prohibits any public officer or employee from naming or appointing to public office or employment of any relative within the fourth degree by blood, marriage, or adoption, by virtue of their office or employment. Court opinions state that a relationship of affinity does not extend beyond blood relatives of the spouse.

4.6.1 – NEPOTISM PENALTY AND ENFORCEMENT

The penalty for violation of the Constitution's nepotism provision is automatic forfeiture of office. The Commission cannot enforce this clause; therefore, it is not necessary to file a complaint with the Commission. For enforcement, contact your county prosecutor or the Attorney General's office.

4.6.2 – NEPOTISM TABLE

If your relative or your spouse's relative appears on this table, they are related to you within the fourth degree of blood or marriage/adoption.

DEGREE	RELATIVES
First degree	Parents and children
Second degree	Grandparents, grandchildren, and siblings
Third degree	Great grandparents, great grandchildren, aunts, uncles, nieces, and nephews
Fourth degree	Great-great grandparents, great-great grandchildren, great aunts, great uncles, first cousins, grand nieces, and grand nephews

For more information on the four degrees of blood and/or marriage, see Advisory Opinion 2020.11.CI.008.



Chapter 5: Lobbying

In this chapter:

- Terms To Know
- Lobbyist Requirements
- 20247 Lobbyist Reporting Deadlines
- Waiting Periods
- Additional Lobbyist Restrictions

5.1 – TERMS TO KNOW

5.1.1 – LOBBYIST – *§§ 105.470, RSMo*

At the state level, a lobbyist is an individual who attempts to influence state executive actions, state legislative actions, or state judicial purchasing actions; and meets one or more of the following:

- Acts in the ordinary course of business.
- Is engaged in pay as a lobbyist.
- Is designated to act as a lobbyist by a person, business entity, governmental entity, religious organization, nonprofit corporation, association, or other entity.
- Spends $50 or more on behalf of public officials annually.

An elected local government official lobbyist is an individual who is employed for the purpose of attempting to influence any action by a local government official elected in a county, city, town, or village with an annual operating budget over $10 million.

A lobbyist may register to lobby any or all branches of government. There are four types of lobbyists: legislative lobbyist, executive lobbyist, judicial lobbyist, and elected local government official lobbyist.

5.1.2 – LEGISLATIVE LIAISONS – *§ 105.470(5)(d), RSMo*

A legislative liaison is any state employee hired to communicate with members of the General Assembly on behalf of any elected official of the state, the judicial branch of state government, or any department/agency/board/commission of the state, provided such entity is a part of the executive branch of state government. A legislative liaison is not a legislative lobbyist.

5.1.3 – LOBBYIST PRINCIPAL – *§ 105.470(7), RSMo*

A lobbyist principal is any person, business entity, governmental entity, religious organization, nonprofit corporation, or association who employs, contracts for pay, or compensates a lobbyist. Every lobbyist must have at least one principal. There is no limit to the number of principals a lobbyist may represent.

Principals do not independently register with the Commission or file their own reports.[7] Individual lobbyists declare their principals upon registration and file reports on behalf of their principals. A lobbyist may add or remove principals at any time.

[7] A principal may choose to file the List of Principals and Legislative Action Report directly with the MEC, rather than having their lobbyist file the report on their behalf.

5.2 – LOBBYIST REQUIREMENTS

5.2.1 – REPORTING REQUIREMENTS – *§ 105.473, RSMo*

Each lobbyist must:

- Register electronically with the MEC. Lobbyists renew their registration each year between December 1 and January 5. Lobbyist registration and renewal must be accompanied by a $10 annual registration fee.
- File monthly reports disclosing any expenditures made on behalf of elected officials, their family, and/or staff and disclosing any direct business relationships with public officials.
- File bi-annual reports describing actions supported or opposed by the lobbyist or their principals.
- Update their registration information within one week of any addition, deletion or change in the lobbyist's employment or representation.

Once registered, lobbyists will receive login credentials to access the MEC's Lobbyist Electronic Filing System. Active lobbyists renew their registration, file reports, and update their information using the MEC's Lobbyist Electronic Filing System.

5.2.2 – LOBBYIST GIFT BAN – *Mo. Const. Art. III, § 2*

The Missouri Constitution prohibits members and employees of the General Assembly from receiving gifts of any tangible or intangible item, service, or thing of value from paid lobbyists or lobbyist principals. The lobbyist gift ban does not prevent candidates for the General Assembly, including candidates for reelection, from accepting campaign contributions. Furthermore, members and employees of the General Assembly may accept gifts, family support, or anything of value from relatives within the fourth degree of blood or marriage (See section 4.6.2 Nepotism Table for relatives included in the four degrees of blood or marriage.) Executive Order 18-10 prohibits lobbyist gifts to the executive branch of state government.

While there is no overarching gift ban for all officials and employees at the local level, some local government entities have chosen to enact lobbyist gift restrictions for officials within their jurisdiction. Elected local government official lobbyists should reach out to local government officials for information on local lobbyist gift restrictions, if any.

For more information about the application of the lobbyist gift ban for members and employees of the General Assembly, please review Advisory Opinion 2019.05.L.003 and Advisory Opinion 2019.05.L.004.

5.3 – 2027 LOBBYIST REPORTING DEADLINES

5.3.1 – MONTHLY EXPENDITURE REPORTS – *§ 105.473, RSMo*

Monthly expenditure reports disclose expenditures made by the lobbyist principal and/or the lobbyist on behalf of public officials, their staff and employees, and their spouses and dependent children. Money spent by the lobbyist or principal on him or herself is not disclosed on expenditure reports.

2027 DEADLINES	TIME PERIOD COVERED
January 11, 2027	Expenditures made in December 2026.
February 10, 2027	Expenditures made in January 2027
March 10, 2027	Expenditures made in February 2027
April 12, 2027	Expenditures made in March 2027
May 10, 2027	Expenditures made in April 2027
June 10, 2027	Expenditures made in May 2027
July 12, 2027	Expenditures made in June 2027
August 10, 2027	Expenditures made in July 2027
September 10, 2027	Expenditures made in August 2027
October 12, 2027	Expenditures made in September 2027
November 10, 2027	Expenditures made in October 2027
December 10, 2027	Expenditures made in November 2027

5.3.2 – LIST OF PRINCIPALS AND LEGISLATIVE ACTION REPORT – *§ 105.473.12, RSMo*

A lobbyist or lobbyist principal must file a List of Principals and Legislative Action Report with the MEC by **March 15, 2027**, and **June 1, 2027**. This report provides a general description of legislation or actions supported or opposed by the lobbyist and/or their principal. Electronic filing of this report is now available for registered lobbyists.

5.4 – WAITING PERIODS

§§ 105.455 and 105.470(5)(d), RSMo

Any person who holds a statewide office of Governor, Lieutenant Governor, Secretary of State, Auditor, Treasurer, Attorney General, or serves in an office appointed by the Governor and confirmed by the Senate, cannot act, serve or register as a lobbyist until six months after their term of office expires.

This provision does not apply to those acting as a legislative liaison for a state department or agency.

5.5 – ADDITIONAL LOBBYIST RESTRICTIONS

5.5.1 – NEW THIS YEAR – LOBBYISTS RUNNING FOR OFFICE – *§ 105.465, RSMo*

In 2026, the General Assembly passed House Bill 1871, which modified restrictions for registered lobbyists running for office. While state law does not prohibit registered lobbyists from running for office, lobbyists who are candidates for public office face additional campaign finance restrictions.

An individual may not simultaneously act as a registered lobbyist and maintain a candidate committee to support a bid for statewide office or General Assembly.

However, state law allows registered lobbyists running for a county, municipal, or school board office to maintain a candidate committee, so long as the individual never simultaneously lobbies the county, municipality, or school district where they are running for office.

Any candidate committee maintained under this law may only use its funds for the purpose of:

- Supporting the individual's candidacy
- Returning a contribution to the original contributor
- Donating to a 501(c)(3)
- Transferring funds to a political party

Any candidate who registers as a lobbyist and is ineligible to maintain their candidate committee must dissolve their candidate committee. When dissolving the committee, excess funds may only be used to:

- Return a contribution to the original contributor
- Donate to a 501(c)(3)
- Transfer funds to a political party

No registered lobbyist can transfer funds from any committee such person controls to another committee controlled by a candidate or public official. See Advisory Opinion 2016.08.L.001 for more information.

5.5.2 – LOBBYISTS AND FOREIGN NATIONALS – *§ 130.188.5, RSMo*

A lobbyist found to have violated the provisions of §§ 130.170 – 130.188, RSMo, may have their lobbyist registration revoked or suspended, and the lobbyist may be enjoined from receiving compensation or making expenditures for lobbying. (See section 3.6.6 Contributions from Foreign Nationals) for more information regarding relevant campaign finance restrictions and consult the statutes for full details.



Chapter 6: Complaints and Investigations

In this chapter:

- What Does the MEC Investigate?
- How to Submit a Complaint
- Complaints Against Candidates
- Complaint Proceedings
- Commission Actions

6.1 – WHAT DOES THE MEC INVESTIGATE?

§§ 105.957 – 130.054, RSMo

The MEC's statutory responsibilities include auditing disclosure reports and reviewing formal complaints for violations of:

- Campaign finance requirements (excluding §§ 130.170 – 130.188, RSMo)
- Conflict of interest laws
- Financial interest disclosure requirements
- Lobbyist requirements
- The provisions of the Constitution or state statute or order, ordinance, or resolution of any political subdivision relating to the official conduct of officials or employees of the state and political subdivisions
- Any code of conduct promulgated by any department, division, or agency of state government or by state institutions of higher education, or by executive order

Investigations are confidential and not available for public viewing. Only Commission actions are published on the MEC's website.

6.2 – HOW TO SUBMIT A COMPLAINT

Any individual may file a complaint with the MEC if they believe there has been a violation of campaign finance disclosure laws, conflict of interest laws, lobbying laws, personal financial disclosure laws, or any order, ordinance, or resolution dealing with the official conduct of public officials or employees. Once a complaint is filed meeting all MEC requirements, a determination is made as to whether an investigation should take place.

To submit a complaint to the MEC:

1. Download a copy of the complaint form from the Commission's website.
2. Complete the form in writing, including all known facts.
3. Notarize the complaint.
4. Mail or deliver the complaint to the Commission. The alleged violator(s) will receive a copy of the complaint within five days of receipt.

6.3 – LIMITATIONS ON COMPLAINTS AGAINST CANDIDATES

§§ 105.957.3 and 130.054, RSMo

- Within 60 days prior to the primary through the general election, the Commission can only accept a complaint against a candidate alleging violations relating to campaign finance disclosure law or PFD requirements.
- The Commission cannot accept any complaints against a candidate within 15 days of an election.
- The Commission may only accept a complaint alleging a candidate has violated Mo. Const. Art. VIII, § 23.3, within 60 days prior to the primary election until the general election.

6.4 – COMPLAINT PROCEEDINGS

Within five days of receiving a complaint (or one business day for complaints filed against candidates within 60 days of an election), the MEC sends a copy of the complaint to the respondent. The MEC also notifies the complainant that the Commission has accepted the complaint for investigation.

An investigation can take up to 90 days.[8] Then the Commission will consider whether to dismiss the complaint or refer it for a legal case. The complaint will either be dismissed at that time or referred to legal counsel for an administrative proceeding or a prosecutor for allegations of criminal conduct or nepotism.

State law requires that Commission investigations and hearings related to a complaint remain confidential.

6.5 – COMMISSION ACTIONS

§ 105.961, RSMo

- A hearing can be held if the Commission finds reasonable grounds that a violation of the law has occurred.
- A hearing is a legal proceeding in which respondents may be represented by legal counsel.
- A respondent is found in violation when at least four members of the Commission find probable cause of a violation.
- The Commission can resolve cases by issuing joint stipulations of fact and law which serve as a settlement.
- Commission actions are public and posted on the MEC website.

[8] Complaints filed against candidates within 60 days before an election must be investigated and presented to the Commission within 15 business days.



Additional Resources

What resources does the MEC provide?

The MEC offers training in a variety of mediums to candidates, elected and public officials, legislators, lobbyists, and others wanting to learn about Missouri's governmental ethics laws.

The Resources and Training page on the MEC's website offers free:

- Webinars
- Publications and information sheets
- YouTube tutorial videos
- FAQs
- Training and presentations for conferences and events

NOTES

NOTES

MEC | MISSOURI ETHICS COMMISSION

Physical address:

3411 A Knipp Drive, Jefferson City, MO 65109

Mailing address:

PO Box 1370, Jefferson City, MO 65102

Phone numbers:

- Campaign finance: 573-751-2013
- Financial disclosure: 573-751-2065
- Lobbying: 573-751-2027
- Toll free: 800-392-8660

Website:

mec.mo.gov

Email:

helpdesk@mec.mo.gov

YouTube:

youtube.com/MOEthics