



# How Missouri's Ethics Commission is Broken by Design

## Executive Summary

Missouri's top watchdog for campaign finance and political corruption has been quietly dismantled, not by budget cuts or bureaucratic failure, but by deliberate inaction from those in power. Successive governors, Mike Parson and Mike Kehoe, have refused to appoint a governing majority of commissioners to the Missouri Ethics Commission (MEC or the Commission), weakening its ability to enforce the law and hold politicians accountable.

This isn't an accident. It's a deliberate abdication of legal responsibility and it's left Missourians unaware while political insiders follow their own rules.

The MEC is currently non-functional. Without a legal quorum, it cannot investigate complaints, enforce campaign finance laws, issue fines or even hold meetings. The Commission has yet to meet in 2025, whereas in 2024 the MEC only met 17 times, compared to 2016 and 2018 where the commission held 28 and 29 meetings respectively.

As Progress MO's latest report shows, the Commission has been effectively sidelined because those in charge failed to fill its seats, even as ethics complaints continue to pile up. Without a functioning commission, 50 complaints have been released with "No Action" in the last two years, which includes 26 complaints filed in 2025 (62%) and 24 complaints in 2024 (25%). In the history of the MEC, only 22 total complaints had "No Action" prior to 2024.

This goes beyond simple administrative neglect. The consequence is a system vulnerable to corruption, where big donors influence decisions and there is no oversight for those in power.

A full database of the Commission's actions and meetings can be found [here](#).

## An Intentional Collapse of Oversight

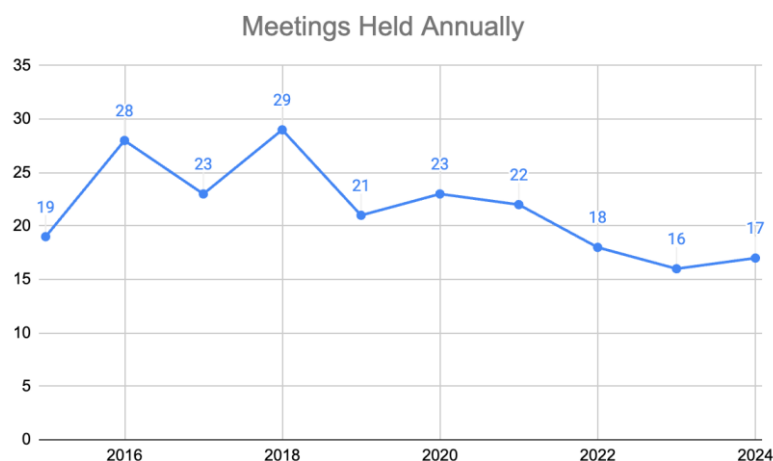
The MEC was established in 1991 by the Missouri Ethics Law (§105.955 RSMo). Its core mission is to enforce the state's law concerning campaign finance, lobbying and conflicts of interest, promoting transparency and accountability in Missouri government.

The MEC consists of six nonpartisan members appointed by the governor and confirmed by the Missouri Senate for a four-year term. To maintain balance, Missouri law states that no more than three commissioners can be from the same political party, and each must reside in a different congressional district. Every two years, the commissioners select a chair and vice chair.

A key operational requirement for the MEC is having a quorum of at least four commissioners to carry out official business, which includes ruling on complaints and issuing enforcement actions. Without this quorum, the Commission is legally unable to hold meetings to:

- Rule on ethics complaints regarding illegal actions by politicians and campaigns.
- Dismiss frivolous complaints filed during campaigns.
- Investigate conflicts of interest.
- Issue advisory opinions.
- Enforce campaign finance laws.
- Approve settlements or levy fines.

The MEC has faced recurring periods of non-functionality due to vacant seats and lack of quorum, with documented lapses in 2014, 2018 and a sustained breakdown beginning in 2022.



As of today, the MEC faces a significant challenge with only two seated commissioners. This prevents the body from fulfilling its essential duties, effectively stopping its ability to enforce ethics laws in the state.

Missouri's ethics watchdog isn't just weakened; former and current governors have rendered it legally powerless.

## Strategic Neglect

Former Gov. Mike Parson [deliberately kept MEC seats vacant for long periods](#). He allowed the Commission to lack a quorum for [several months in 2022](#), [multiple stretches in 2023](#), and five months in 2024. Even after appointing a fourth member in 2024, [the body still didn't have four commissioners who could be present at meetings](#).

Current Governor Mike Kehoe has chosen to leave this paralysis in place. He could have taken action to address it at the start of his term in January 2025; however, he has said little about the Commission's continued ineffectiveness, only noting [that the Commission already lacked a quorum when he took office](#). There hasn't been a new nomination in over a year.

In some cases, commissioners' terms expire, and the governor does not nominate replacements. State law requires that within 30 days of a vacancy, congressional district committees of both major parties in Missouri must submit two qualified nominees to the governor.

In other cases, nominees stalled during Senate confirmation, with no clear efforts from the governor's office to push for their approval. Senate politicians then blocked these nominations, keeping the MEC powerless and allowing Missouri to remain a rules-free zone.

Commissioner	Term Start Date	Term End Date	Senate Confirmation
Eric Dirks	3/16/2014	3/15/2018	7/21/2015
Donald Summers	3/16/2016	3/15/2020	4/7/2016
Kimberly Benjamin	3/16/2016	3/15/2020	5/5/2016
George Ratermann	3/16/2016	3/15/2020	5/5/2016
Wayne Henke	3/16/2018	3/15/2022	4/19/2018
Cheryl Walker	3/16/2018	3/15/2022	11/2/2018
Bill Birkes	3/16/2018	3/15/2022	11/2/2018
Robert Cook	3/16/2020	3/15/2024	4/8/2020
Helene Frischer	3/16/2020	3/15/2024	6/3/2020
William Villapiano	3/16/2020	3/15/2024	5/24/2022
Kathie Conway**	3/16/2022	8/24/2024	5/24/2022

Robin Wheeler Sanders	3/16/2022	3/15/2026	7/12/2022
Jeremy Schneider	3/16/2024	3/15/2028	4/25/2024
Whitney Smith*	3/16/2024	1/13/2025	6/6/2024
Jim Martin*	3/16/2024	1/13/2025	7/12/2024

\* Nominations were withdrawn as interim appointments

\*\* Passed away while serving her term

These prolonged delays in seating the MEC are not procedural oversights. They reflect a deliberate decision by political actors and state leaders to weaken the only body responsible for enforcing ethics laws that target themselves and their allies.

The outcome is clear: a deliberate abdication of oversight that leaves Missouri's political landscape exposed to unchecked influence and misconduct.

## A Total Collapse with Bipartisan Harm

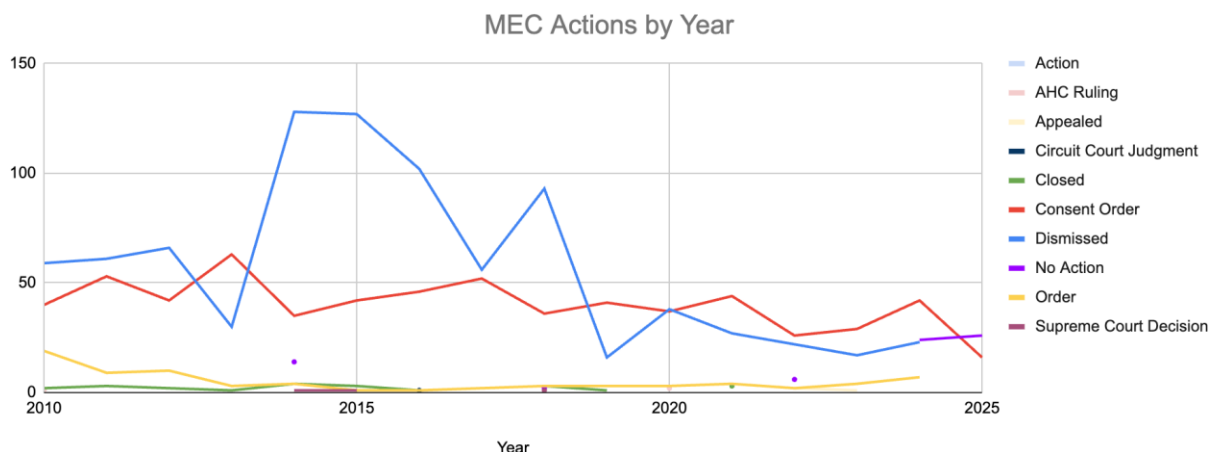
The governors' decision to neuter the MEC protects powerful and connected individuals, regardless of their political party. This inaction also denies people who file ethics complaints – who may be unfairly criticized – a fair process for clearing their names. As a result, complaints filed against both Democratic and Republican candidates and officials have been dismissed, ignored or left unresolved because the Commission lacks a quorum.

<b>Respondent/Organization Committee Name</b>	<b>County</b>	<b>Date</b>	<b>Category</b>	<b>Action</b>
Verneti, Jeff/Committee to Elect Jeff Verneti	Camden County	6/15/2025	Campaign Finance	No Action
Nicola, Joe/New Covenant Ministries	Jackson County	4/14/2025	Campaign Finance	No Action
Burton, Michael/Friends of Michael Burton	St. Louis County	2/25/2025	Campaign Finance	No Action
Gross, Elad/Take Missouri Back	St. Louis City	4/16/2024	Campaign Finance	No Action

This isn't about partisan advantage; it's about institutional failure. When the MEC breaks down, accountability vanishes for everyone, except for those who continue to follow the rules.

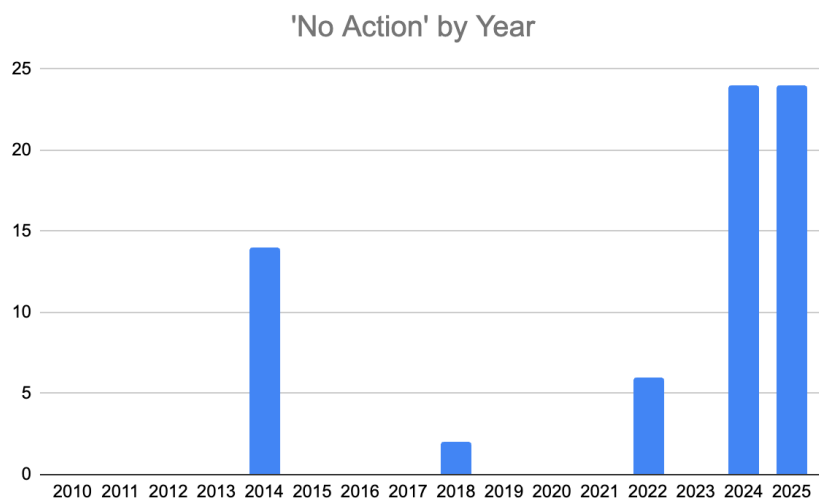
## Declining Action, Increasing Silence

In 2025, ethics enforcement in Missouri has stopped entirely because current and former governors failed to appoint enough commissioners. As the MEC lost quorum or operated with minimal participation, the number of actions taken dropped significantly.



These were not quiet years. These were years when Missouri experienced multiple statewide ballot measures and high-profile legislative battles.

Yet the MEC has taken less action than at any point in the past 15 years. In 2024 alone, the Commission issued 24 “No Action” rulings, the highest in over a decade. That number has steadily risen from just six in 2022, two in 2018, and 14 in 2014, indicating a growing trend of inaction rather than enforcement.



## What the Law Says, And Where it Fails

Missouri law gives the governor full authority to appoint commissioners, making them solely responsible for keeping the Commission operational. This is a duty that both Parson and Kehoe have routinely carried out for other state commissions, yet they have noticeably neglected it for the MEC. However, there is no legal deadline for making appointments or confirmations. No contingency plan exists for quorum loss, nor is there an emergency clause that permits the body to conduct limited enforcement. When the seats are vacant, so is the law.

One notable case involves Senator Joe Nicola who improperly [moved money from his church to his senate campaign](#). Federal law prohibits churches and other charities from engaging in political campaign activities, such as making donations or endorsing candidates, in exchange for maintaining their federal tax-exempt status.

A formal complaint alleged Nicola violated the state's campaign laws by using his church to conceal donor identities or function as an unregistered political committee. The complaint was dismissed not due to a lack of merit but because the MEC did not have enough commissioners to legally investigate the complaint. This was one of 26 complaints dismissed in 2025 due to insufficient quorum.



The filer of the Nicola complaint refiled the complaint after 90 days, hoping the MEC would be functional again. But the delay illustrates the stakes: Missouri law mandates that the MEC resolve complaints within 90 days. Without a quorum, that window closes, causing violations to expire and accountability to vanish.

## Inaction Beneficiaries

When the MEC is ineffective:

- Candidates can delay or omit financial disclosures.
- Lobbyists can underreport gifts or activities.
- Conflict-of-interest violations face no meaningful scrutiny.
- Political Action Committees can operate in near-total secrecy.

This environment does not serve voters. It serves those with competent legal teams, money and insider access to powerful political actors. It rewards bad behavior and discourages good-faith compliance.

In Nicola's case, serious questions were raised about donor transparency and the use of a church in electoral finance. However, because Governors Parson and Kehoe have paralyzed the MEC, Nicola faces no official action and gets off scot-free.

This isn't just a paperwork problem. It's a deliberate sidelining of the only body tasked with keeping power in check.

## **Missouri's Accountability Vacuum**

Without the MEC:

- Complaints are unresolved.
- Campaigns operate in legal gray zones.
- Public officials violate ethics guidelines without consequence.
- Advisory rulings cannot be issued.

The Nicola case also highlights another dangerous dynamic: if and when Gov. Kehoe appoints new commissioners, they will need confirmation by the Missouri Senate, where Nicola holds a vote. That means an elected official could vote on whether to confirm the very commissioners who would rule on an ethics complaint against him. This kind of political entanglement is quickly becoming status quo.

Ethics laws may remain on the books, but without enforcement, they're little more than decoration.

## **What Must Happen Now**

To restore public trust and basic ethical oversight, state leaders must:

- Immediately appoint and confirm MEC commissioners to regain quorum.
- Enact statutory deadlines for appointments and Senate confirmations.
- Authorize interim procedures for limited staff enforcement during quorum gaps.

- Reform the appointment process to reduce political bottlenecks and partisanship.

Missourians deserve better than a system that enables misconduct through inaction. Without urgent intervention, this dysfunction will continue into 2026.

## **Ethics Only Matter if the Rules are Enforced**

The MEC hasn't failed due to flawed law or partisan conflict. It has failed because those in power chose not to maintain it. This is deliberate sabotage through inaction, and the consequences fall on the shoulders of Missourians.

Progress MO calls on Governor Kehoe and the Missouri Senate to immediately restore quorum, reform the system before the 2026 election cycle ramps up and stop leaving Missourians in the dark.

The public should demand it. Tell Governor Kehoe: doing nothing is a choice – and it's a choice that helps corrupt politicians, not voters.