

August 18, 2021

City of Sunset Hills

As a political subdivision with an annual operating budget over \$1 million, you have the option of passing an ordinance, order, or resolution at an open meeting by September 15<sup>th</sup>, which establishes and makes public its own method of disclosing potential conflicts of interest and substantial interests pursuant to [§105.485.4](#)

If a conflict of interest ordinance, resolution, or policy is adopted, at a minimum, the following individuals or officials would be required to file a Financial Disclosure Statement for Political Subdivisions (short form) with the Missouri Ethics Commission (MEC):

- Chief administrative officer,
- Chief Purchasing office,
- Candidates and public officials who have conducted business or have a substantial interest in a business that conducted business with the political subdivision over \$500 per transaction or if the candidate's or public official's relative within the first degree (by blood or marriage) did the same.

The conflict of interest ordinance, resolution, or policy must be adopted by September 15, 2021. Within 10 days of adoption a certified copy (signed by the presiding officer and attested by the clerk of the governing body) must be submitted to the MEC. For additional information refer to the following materials on our website: [Sample Ordinance](#), [Guide to Ethics Laws](#), [Guide to and Personal Financial Disclosure](#).

Please note that the minimum requirements outlined in statute for an ordinance do not include penalties. Any penalties that the subdivision is authorized to enforce should be established by the ordinance. Upon adopting the ordinance, the political subdivision becomes responsible for enforcing the ordinance, including any penalties and ballot removal of candidates.

**If a conflict of interest ordinance, resolution, or policy is not adopted then the following individuals will file a Personal Financial Disclosure Statement (long) form with the MEC:**

- All elected officials,
- All candidates for elected office,
- Chief administrative officer,
- Chief purchasing officer,
- General Counsel (if employed full-time), and
- Any official or employee authorized by the political subdivision's governing body to promulgate rules and regulations or vote on the adoption or rules and regulations.

Should you have any questions or need assistance, contact the MEC at 800-392-8660 or [pfdonline@mec.mo.gov](mailto:pfdonline@mec.mo.gov)

Thank you,

Shawna Hillen  
Reporting Specialist