



ATTORNEY GENERAL OF MISSOURI

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ATTORNEY GENERAL'S OFFICE ETHICS POLICY

As the chief law-enforcement agency in the State of Missouri, the Attorney General's Office (AGO) must adhere to the strictest standards of ethics, integrity, and transparency. The People of Missouri deserve nothing less. This Ethics Policy, which imposes the toughest ethics standards in the Nation, will ensure that the public can trust that the AGO will always serve the public interest, not special interests and lobbyists.

The AGO's Ethics Policy has four central pillars:

- Neither the Attorney General nor any AGO employees may accept gifts from lobbyists.
- Neither the Attorney General nor any AGO employees will communicate with any person about AGO business unless that person has fully complied with Missouri's lobbyist-registration requirements.
- The Attorney General will not accept any campaign contributions from any person who has a pending bid or application for a state contract on which the AGO has decision-making authority.
- The Attorney General will not accept any campaign contributions from any person currently under investigation by the AGO.

This Ethics Policy is effective as of January 10, 2017. The obligations imposed by this Ethics Policy are in addition to those imposed on AGO employees by Missouri and federal Law, by the Missouri Rules of Professional Conduct, and by the AGO Employee Handbook.

I. Neither the Attorney General Nor Any AGO Employees May Accept Gifts from Lobbyists.

When elected officials and government employees accept gifts from lobbyists, the public loses faith in its government. Lobbyist gifts give the appearance that government officials enrich themselves by serving special interests rather than the public interest. The AGO is the chief law-enforcement agency in the State of Missouri, and it is essential that the AGO maintain the strictest standards in order to preserve the public's trust. **Thus, neither the Attorney General nor any AGO employees may accept anything of value from any registered lobbyist.**

Each year, every AGO employee will be required to certify in writing that he or she has fully complied with this prohibition. In addition, the AGO will conduct a rigorous internal review of all lobbyist disclosures to ensure that no AGO employees have received any

impermissible gifts. To help employees identify registered lobbyists whom they might know—and from whom they might otherwise accept gifts without recognizing that those gifts would violate this Ethics Policy—the AGO will post a list of all registered lobbyists on the Office’s intranet system. This list can also be accessed online at <http://mec.mo.gov/MEC/Lobbying/ActiveLobbyists.aspx>. This Ethics Policy shall not apply to any transfers that fall within the scope of RSMo. § 105.470(3)(a).

II. Neither the Attorney General Nor Any AGO Employees Will Communicate with Any Person About AGO Business Unless That Person Has Fully Complied with Missouri’s Lobbyist-Registration Requirements.

Requiring lobbyists to disclose whom they represent and which public officials they lobby provides the public with critical information necessary to hold elected officials accountable and to prevent corruption and abuse of power. Under Missouri law, a person who seeks to influence any action of the AGO ordinarily qualifies as a lobbyist if that person is acting within the scope of his or her employment or receives any valuable consideration in exchange for his or her actions. *See* RSMo. § 105.470(2), (6). Such a lobbyist ordinarily must register with the Missouri Ethics Commission. RSMo. § 105.473.1.

The AGO takes these lobbying regulations and their mandate of transparency very seriously. **Thus, neither the Attorney General nor any AGO employees will communicate with any person regarding AGO business unless that person has fully complied with all applicable lobbyist-registration requirements under Missouri law.** This prohibition includes any attorneys who, in the course of representing clients, engage in conduct that falls within the scope of Missouri’s lobbying regulations.

III. The Attorney General Will Not Accept Any Campaign Contributions from Any Person Who Has a Pending Bid or Application for a State Contract on Which the AGO Has Decision-Making Authority.

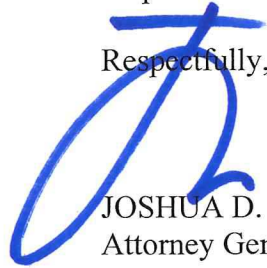
When the State awards government contracts, taxpayers deserve to know that their dollars will go to the person who can do the best possible work for the most reasonable price—not to the person who makes the biggest contribution to the official awarding the contract. Even the mere perception of “pay to play” degrades the public’s trust in government. **Thus, the Attorney General’s campaign committee will not accept any campaign contributions from any person who has a pending bid or application for a state contract on which the AGO has decision-making authority.**

In addition to measures adopted by the campaign committee, the AGO will conduct regular internal audits to ensure compliance with this prohibition. To facilitate these audits, all AGO employees who are involved in the consideration of bids or applications for any state contract must promptly notify the AGO’s ethics coordinator of their involvement, as well as the identities of any person who submits a bid or application for that contract.

IV. The Attorney General Will Not Accept Any Campaign Contributions from Any Person Currently under Investigation by the AGO.

Few campaign contributions are more unseemly than when the target of a government investigation contributes to the official conducting the investigation. These contributions give the appearance of outright bribery of law enforcement. Unfortunately, contributions of this sort have been made in the past in Missouri. That practice is unacceptable. **Thus, the Attorney General will not accept any campaign contributions from any person currently under investigation by the AGO.** In addition to measures adopted by the campaign committee, the AGO will conduct regular internal audits to ensure compliance with this prohibition.

Respectfully,



JOSHUA D. HAWLEY
Attorney General

From: [Coffey, Pam](#)
To: [DG-ALL-AGO-STAFF](#)
Subject: Message for Staff - On behalf of AG Koster
Date: Wednesday, September 28, 2011 3:48:50 PM

As many of you know, I have announced my intention to seek reelection to the Office of Attorney General. While I appreciate the well wishes and support that many of you have offered in this office, I respectfully request that no employees of the Missouri Attorney General's Office make any political contribution to my campaign for reelection. I intend to maintain our current policy of an absolute separation between the important work that we do for Missouri citizens and the process of politics through which officeholders are selected. Thank you for understanding, and thank you for your continued work on behalf of this office and the people of Missouri.

Attorney General Koster

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