



MISSOURI ETHICS COMMISSION

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James Klahr
Executive Director

October 28, 2016

James Thomas
Freedom PAC
7509 Tiffany Springs Parkway
Suite 300
Kansas City MO 64153

Re: File No. 16-0085-I

Dear Mr. Thomas:

The Missouri Ethics Commission considered the complaint filed against Freedom PAC, a continuing committee registered with the Missouri Ethics Commission. The Commission reviewed allegations that Freedom PAC improperly coordinated with Ms. Dagmar Wood regarding mailers Freedom PAC distributed before the August 2 Republican primary election for Platte County Commissioner. The mailers promoted Ms. Wood's candidacy and opposed the candidacy of her primary opponent.

In the course of reviewing the allegations, staff was unable to find evidence that Freedom PAC communicated with Dagmar Wood or her candidate committee regarding the mailers Freedom PAC distributed. Had Freedom PAC communicated with Ms. Wood or Wood for Commissioner regarding the mailers, then Wood for Commissioner would have been required to report the mailers as in-kind contributions from Freedom PAC (see Section 130.041.1(3)(d), RSMo, which requires committees to report the total dollar value of all in-kind contributions received).

Freedom PAC reported the expenditures for the two mailers as direct expenditures. For the first mailer, the committee reported in a 24 Hour Expenditure Report filed on July 23, 2016 that it incurred \$4,330 for a mailer in support of Dagmar Wood. On July 27, 2016, the committee reported in a 24 Hour Expenditure Report that it incurred \$4,330. In that report, the committee allocated half the amount of the mailer (\$2,165) as supporting Dagmar Wood and the other half of the amount as opposing Ms. Wood's opponent. Freedom PAC's reports follow the guidelines of Section 130.046.3(2), RSMo, regarding the reporting of expenditures within 12 days before the election.

As a result, the Commission finds no reasonable grounds to support a violation of the campaign finance laws in Chapter 130, RSMo, or the conflict of interest laws in Chapter 105, RSMo, and dismissed the complaint.

Sincerely,

James Klahr,
Executive Director