MISSOURI ETHICS COMMISSION
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James Klahr
Executive Director

November 1, 2016

Tom Walsh
Hawley for Missouri
PO Box 1073
Columbia MO 65205

Re: File No. 16-0103-I

Dear Mr. Walsh:

The Missouri Ethics Commission considered the complaint filed against you and Hawley for Missouri at its meeting on October 27, 2016. The Commission reviewed allegations that you and Hawley for Missouri engaged in a series of transactions to conceal the identity of actual contributors.

Staff review of this complaint determined that Missouri Freedom PAC filed its Statement of Committee Organization with the Commission on August 2, 2016. In its Statement, it indicated that it supported the Republican candidate for Attorney General in the November 8, 2016 general election.

Between August 3, 2016 and September 28, 2016, Missouri Freedom PAC reported receiving 4 contributions from the Republican Attorneys General Association (RAGA) totaling $3,065,000. In the same time period, Hawley for Missouri reported receiving 4 contributions between August 4, 2016 and September 29, 2016 from Missouri Freedom PAC totaling $3,050,000.

Hawley for Missouri complied with its reporting obligations under Section 130.021.11, RSMo, when it timely filed its 48 Hour Reports indicating the amount of the contributions received from Missouri Freedom PAC.[1]

With respect to the allegation that Joshua Hawley or Hawley for Missouri participated in or directed the transactions which ultimately led to contributions received by Hawley for Missouri, Mr. Hawley provided an affidavit denying any knowledge regarding the formation of either RAGA or Missouri Freedom PAC and further denied any involvement in decisions made by RAGA or Missouri Freedom PAC to make contributions to Hawley for Missouri.

From the facts presented, the Commission finds no reasonable grounds exist to support a violation of Chapter 130, RSMo, and is dismissing the complaint.

Sincerely,

James Klahr
Executive Director

[1] In this instance, Hawley for Missouri was required to file 48 Hour Reports because each of the contributions received was $1,500 or more pursuant to Sec. 130.021.11, RSMo. Hawley for Missouri was also required to file 48 Hour Reports because each of the contributions received were over $5,000 (see Sec. 130.044, RSMo).