



MISSOURI ETHICS COMMISSION

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Jefferson City, MO 65102
www.mec.mo.gov
(573) 751-2020 / (800) 392-8660

James Klahr
Executive Director

November 2, 2016

Nicholas Britt, Treasurer
SEALs for Truth
PO Box 29522
Washington DC 20017

Re: File No. 16-0075-I

Dear Mr. Britt:

The Missouri Ethics Commission considered the complaint filed against SEALs for Truth at its November 2, 2016 meeting. The Commission reviewed the allegation that SEALs for Truth concealed the actual source of a contribution made to SEALs for Truth in the amount of at least \$1.975 million which SEALs for Truth later made to Greitens for Missouri.

SEALs for Truth filed its Statement of Organization with the Federal Election Commission on June 15, 2016. Under the entry for Type of Committee, SEALs for Truth identified itself as a Political Action Committee (PAC) and marked the box indicating that it supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee).

Staff review of the complaint determined that Greitens for Missouri reported receiving a \$1.975 million contribution from SEALs for Truth on a 48 Hour Disclosure Report filed with the MEC on July 18, 2016. The report indicated that the contribution was received on July 18, 2016.

On October 14, 2016, SEALs for Truth filed its October Quarterly Report with the FEC. This report covered activity for the period July 1, 2016 through September 30, 2016. The report showed that SEALs for Truth received a \$2 million contribution from American Policy Coalition, Inc. on July 18, 2016. The report also reflected that SEALs for Truth made a \$1.975 million contribution to Greitens for Missouri on July 18, 2016.

Section 130.031.3, RSMo, provides:

No contribution shall be made or accepted and no expenditure shall be made or incurred, directly or indirectly, in a fictitious name, in the name of another person, or by or through another person in such a manner as to conceal the identity of the actual source of the contribution or the actual recipient and purpose of the expenditure. Any person who receives contributions for a committee shall disclose to that committee's treasurer, deputy treasurer or candidate the recipient's own name and address and the name and address of the actual source of each contribution such person has received for that committee. Any person who makes expenditures for a committee shall disclose to that committee's treasurer, deputy treasurer or candidate such person's own name and address, the name



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and address of each person to whom an expenditure has been made and the amount and purpose of the expenditures the person has made for that committee.

When SEALs for Truth filed its October Quarterly Report with the FEC, it listed a Washington D.C. P.O. Box as the mailing address for American Policy Coalition. Staff investigation determined and SEALs for Truth confirmed to Commission staff that American Policy Coalition was a 501(c)(4) organization registered with the Kentucky Secretary of State at the time it made the contribution to SEALs for Truth.

As a 501(c)(4) organization, American Policy Coalition is a "person" as defined in Section 130.011(22), RSMo. Therefore, SEALs for Truth reported the contribution received from American Policy Coalition in a manner that did not violate Section 130.031.3, RSMo. Its FEC report identified the entity making the contribution to it and staff confirmed that the entity named in the FEC report is the same entity that was registered with the Kentucky Secretary of State.

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,

A handwritten signature in cursive script, appearing to read "James Klahr".

James Klahr
Executive Director