



**MISSOURI ETHICS COMMISSION**

PO Box 1370  
Jefferson City, MO 65102  
[www.mec.mo.gov](http://www.mec.mo.gov)  
(573) 751-2020 / (800) 392-8660

James Klahr  
Executive Director

December 22, 2016

Missouri Freedom PAC  
Tony Feather, Treasurer  
1747 Pennsylvania Ave NW Ste 800  
Washington DC 20006

Re: File No. 16-0105-I

Dear Mr. Feather:

The Missouri Ethics Commission considered the complaint filed against you and Missouri Freedom PAC at its December 20, 2016 meeting. The Commission reviewed the allegation that Missouri Freedom PAC, a continuing committee registered with MEC, along with the Republican Attorneys General Association (RAGA), engaged in a series of transactions to conceal the identity of actual contributors to Hawley for Missouri, the candidate committee supporting Joshua Hawley's candidacy for Missouri Attorney General. The complaint also alleged that RAGA is an out of state committee and failed to register and file reports with MEC.

Staff review of the complaint determined that Hawley for Missouri is a candidate committee that formed with MEC in July 2015. RAGA is a nonprofit corporation based in Washington, D.C. RAGA is registered with the IRS as a Section 527 Political Organization. Missouri Freedom PAC registered as a continuing committee (PAC) with MEC on August 2, 2016. In its Statement of Committee Organization, it listed the committee address as the same address used by RAGA and listed RAGA and its Washington, D.C. address under "Additional Committee Information." Missouri Freedom PAC listed the Republican Attorney General candidate as the candidate supported for the November 8, 2016 election.<sup>1</sup>

Staff determined that Missouri Freedom PAC is RAGA's state PAC for Missouri. When Missouri Freedom PAC registered with MEC, it satisfied the necessary committee filing requirements as provided in Section 130.021.10, RSMo.

As the state PAC for RAGA, staff determined that Missouri Freedom PAC filed all necessary campaign finance reports to reflect its contributions received from RAGA and, in turn, the contributions Missouri Freedom PAC made to Hawley for Missouri. In addition, RAGA informed staff that it does not accept contributions earmarked for particular candidates.

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<sup>1</sup> At the time of Missouri Freedom PAC's filing, the winner of the Missouri Republican Primary had not yet been determined because the primary election was held the same day Missouri Freedom PAC filed its Statement of Committee Organization.



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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