



MISSOURI ETHICS COMMISSION

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James Klahr
Executive Director

January 5, 2015

James C. Thomas III, Treasurer
RSLC – Missouri PAC
1201 F Street NW Ste. 675
Washington DC 20004

MEC No. 14-0002-I

Dear Mr. Thomas:

At the December 30, 2014 meeting, the Commission considered the complaint filed against RSLC-Missouri PAC. The Commission reviewed the allegation that the committee paid for mailers with an improper “paid for by” disclosure.

The complaint alleges that material was sent to voters in Cole County related to a November 4, 2014 election for judge in the 19th Judicial Circuit. Rather than use the name of the committee as registered with the Missouri Ethics Commission (RSLC – Missouri PAC), the mailing attached to the complaint identifies the material as being paid for by “The Republican State Leadership Committee - Missouri PAC, James C Thomas III, Treasurer.”

From the facts presented, the paid for by was in violation of Section 130.031.8, RSMo. That provision requires that, “in regard to any printed matter paid for by a committee, it shall be sufficient identification to print the name of the committee as required to be registered by subsection 5 of section 130.021 and the name and title of the committee treasurer who was serving when the printed matter was paid for.”

Section 130.021.5, RSMo, requires that a committee’s Statement of Committee Organization contains: “(1) the name, mailing address and telephone number, if any, of the committee filing the statement of committee organization. If the committee is deemed to be affiliated with a connected organization as provided in subdivision (11) of section 130.011, the name of the connected organization, or a legally registered fictitious name which reasonably identifies the connected organization, shall appear in the name of the committee. . . .”

In reviewing the complaint, the Commission has determined to take no further action and close the complaint. While the committee’s Statement of Committee Organization lists the committee name as RSLC – Missouri PAC, that was not the committee name used in the mailer. Even though the committee’s Statement of Committee Organization lists “Republican State Leadership Committee” as a connected organization, that is not the committee’s name as it appears in the “Committee Information” portion of the Statement of Committee Organization.

The committee’s use of the connected organization name in the paid for by disclosure provided more information to the public about the committee’s identity than had the committee identified itself as RSLC-Missouri PAC. However, the committee’s choice to use “Republican State Leadership Committee” in the paid for by disclosure may have made it more difficult for the

public to find the committee on the Commission's website as the committee is searchable by its committee name as registered in its Statement of Committee Organization. In this case, the public would need to know that the way to search for Republican State Leadership Committee – Missouri PAC would be to search under RSLC – Missouri PAC.¹ There was nothing in the paid for by disclosure that made this connection for the public.

The Commission advises the committee to review any future paid for by disclosures to ensure that the committee name appearing on the paid for by disclosure matches the name registered with the Missouri Ethics Commission.

Sincerely,



James Klahr
Executive Director

¹ While the public could have searched under "Missouri PAC" and found RSLC-Missouri PAC, the search for "Missouri PAC" still generates 19 committee names. Likewise, the public could have searched under "James C. Thomas III" under the Treasurer search. That search generates 12 committee names, including RSLC-Missouri PAC.