



MISSOURI ETHICS COMMISSION

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James Klahr

Executive Director

March 10, 2016

Eric Greitens
Greitens for Missouri
4522 Maryland Ave
St. Louis MO 63108

Re: File No. 16-0005-I

Dear Mr. Greitens:

The Missouri Ethics Commission considered the complaint filed against you and Greitens for Missouri at its March 10, 2016 meeting. The complaint alleged that, since July 2015, two employees have worked for your candidate committee, Greitens for Missouri, but have been paid by Eric Greitens, LLC doing business as The Greitens Group. The complaint asserts that, to the extent these individuals worked for Greitens for Missouri but were compensated by The Greitens Group, Greitens for Missouri failed to report this compensation as an in-kind contribution from The Greitens Group to Greitens for Missouri.

Staff review of the complaint determined that one of the individuals referenced in the complaint received compensation from The Greitens Group during 2015. In January 2016 that individual began working for and receiving compensation from Greitens for Missouri. During this same time period, that individual received reimbursements for travel and expenses from either The Greitens Group or Greitens for Missouri depending on the nature and purpose of the travel. Staff review confirms amounts reimbursed to that individual by the committee are supported by supplied documentation of expense request forms completed and submitted to the committee, Greitens for Missouri. Staff review of documentation provided by The Greitens Group supports that reimbursements made to that individual for work performed for The Greitens Group were not related to any work for Greitens for Missouri.

Review determined that, during the time period reviewed, the other individual referenced in the complaint was neither employed nor reimbursed for expenses by Greitens for Missouri or The Greitens Group. This individual performed volunteer work for Greitens for Missouri and did not begin receiving compensation from Greitens for Missouri until February 2016.

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

Sincerely,

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

James Klahr
Executive Director