



**MISSOURI ETHICS COMMISSION**

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James Klahr

Executive Director

August 31, 2016

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

Re: File No. 16-0083-I

Dear Mr. Greitens:

The Missouri Ethics Commission considered the complaint filed against you and Greitens for Missouri at its August 30, 2016 meeting. The Commission reviewed the allegation that you had prior knowledge and consented to expenditures made by LG PAC, but failed to report those expenditures on behalf of Greitens for Governor as an in-kind contribution.

Staff review of the complaint determined that LG PAC registered with the Federal Election Commission (FEC) as a political action committee on May 16, 2016. On its July 15, 2016 FEC report, LG PAC reported making over \$2 million in expenditures to Main Street Media Group in Alexandria, VA. The PAC's reports indicated that it made the expenditures between June 2 and June 30, 2016.

As it relates to this complaint, the relevant language from section 130.041.1, RSMo, provides:

Except as provided in subsection 5 of section 130.016, the candidate, if applicable, treasurer or deputy treasurer of every committee which is required to file a statement of organization, shall file a legibly printed or typed disclosure report of receipts and expenditures. The reports shall be filed with the appropriate officer designated in section 130.026 at the times and for the periods prescribed in section 130.046. Except as provided in sections 130.049 and 130.050, each report shall set forth:

...

(3) Receipts for the period, including:

...

(d) Total dollar value of all in-kind contributions received.

Section 130.011(19), RSMo, defines an "in-kind contribution" or "in-kind expenditure" as a contribution or expenditure in a form other than money.

In response to staff questions, you provided a certified statement denying any prior knowledge about LG PAC's planned media buy prior to LG PAC making those expenditures. The attorney for LG PAC stated that no one involved with Greitens for Missouri had any participation or knowledge of LG PAC's planned media buy prior to it occurring.

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