



MISSOURI ETHICS COMMISSION

PO Box 1370

Jefferson City, MO 65102

www.mec.mo.gov

(573) 751-2020 / (800) 392-8660

Elizabeth L. Ziegler
Executive Director

Final Action: MEC No. 18-0073-I, Tony Luetkemeyer

Date: September 7, 2018

The Missouri Ethics Commission took final consideration of the complaint filed against Tony Luetkemeyer at its September 6, 2018, meeting. Because Mr. Luetkemeyer was a candidate for office in the August 7, 2018 primary election, §130.056, RSMo required that the Commission investigate this complaint within 15 days of receipt.

The complaint alleged Tony Luetkemeyer, a candidate for State Senate, District 34, coordinated activities with Missouri Senate Conservatives Fund (MSCF), a Missouri Political Action Committee, in support of his candidacy and in opposition to his opponent. Such coordination, if it existed, would require the reporting of contributions by his committee, Luetkemeyer for Senate, from the MSCF. Such contributions would exceed the contribution limit of \$2,600.00 for candidates for State Senate under Mo. Const. Art. VIII. Sec. 23.3(1) (a). The allegations in the complaint were largely based upon the fact that Axiom Strategies, LLC provided consultant services for both committees.¹

Staff review of the complaint determined MSCF operates as an independent expenditure only committee, and reported direct expenditures in support of Tony Luetkemeyer and in opposition of Harry Roberts, on the following reports: the July 2018 Quarterly Report, the 8 Day Before Election Report, and 24 Hour Expenditure Reports filed up to the date of the primary election.

The investigation showed that Axiom Strategies, LLC utilized an internal firewall policy prohibiting the coordination between candidates and independent expenditure committees it represents, including these two committees. Both committees demonstrated that they did not coordinate any direct mail messaging produced by MSCF. Therefore, the investigation did not find evidence to support the requirement that the Luetkemeyer for Senate committee report that an in-kind contribution from MSCF.

From the facts presented, the Commission finds no reasonable grounds exist to support a violation of Chapter 130, RSMo, or the Missouri Constitution and is dismissing the complaint.

Elizabeth L. Ziegler
Executive Director

¹ Axiom Strategies is now owned by Garrison Management Group, LLC.