



## Missouri Ethics Commission

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EXECUTIVE DIRECTOR

### **Final Action: MEC No. 20-0015-I – Cornerstone 1791 dba Liberty Alliance USA**

**Date: August 3, 2020**

At its August 3, 2020 meeting, the Missouri Ethics Commission took final consideration of the complaint filed against Cornerstone 1791 dba Liberty Alliance USA (“Cornerstone”).

The complaint that was filed with the Commission alleged that Cornerstone failed to register with the Commission as a continuing committee (PAC) and failed to file required regular campaign finance disclosure reports. The complaint relied on the timing and considerable publications produced by Liberty Alliance USA as evidence that it accepted contributions and made expenditures for the primary or incidental purpose of defeating Nicole Galloway in her campaign for Governor of Missouri.

Cornerstone 1791 is a 501(c)(4) incorporated in the State of Missouri in February 2019. A fictitious name, Liberty Alliance USA, was registered with the Missouri Secretary of State on August 14, 2019, listing Cornerstone 1791 as 100% owner. On its website, [libertyallianceusa.com](http://libertyallianceusa.com), the entity states its mission is to fight for conservative causes and promote grassroots activism in Missouri.

Nicole Galloway currently holds the office of State Auditor. On August 8, 2019, the Commission received an amended Statement of Committee Organization for Nicole Galloway for Missouri (C111091) listing Governor as the office sought by Nicole Galloway in the August 2020 election. On August 12, 2019, Nicole Galloway publicly announced her intent to run for the office.

The investigation determined that Cornerstone did not meet the legal definition of a continuing committee (PAC). While numerous publications discussed Nicole Galloway in her role as state Auditor, these publications did not meet the legal standards of advocacy required to constitute a campaign finance expenditure. In addition, solicitations for donations by Liberty Alliance USA stated that moneys would be used to promote conservative values and oppose socialism, with no specific reference to candidacy for office. In sum, the conduct did not meet the legal standards of receiving contributions or making expenditures to support or oppose a candidate, as required by campaign finance disclosure law.

From the facts presented under the applicable law, the Commission found no reasonable grounds exist to support a violation of the Chapter 130, RSMo, and dismissed the complaint.