



Missouri Ethics Commission

Elizabeth L. Ziegler
EXECUTIVE DIRECTOR

Final Action: MEC No. 20-0093-I, Donalee Gastreich, Campaign to Elect Donalee Gastreich

Date: 1/7/2021

The Missouri Ethics Commission took final consideration of the complaint filed against Donalee Gastreich and her candidate committee, Campaign to Elect Donalee Gastreich, at its January 6, 2021 meeting. Ms. Gastreich recently ran for city council in St. Charles.

The complaint filed with the Commission alleged that expenditures on the committee's campaign finance reports were disclosed in a manner that concealed the true nature of the expenditures. Additionally, the complaint alleged that the committee distributed an endorsement letter with an inaccurate "Paid for by" disclosure and that the committee failed to report the receipt of the endorsement letter as an in-kind contribution from another candidate committee.

With respect to the concealing allegation: Section 130.031.3, RSMo, states that:

No contribution shall be made or accepted and no expenditure shall be made or incurred, directly or indirectly, in a fictitious name, in the name of another person, or by or through another person in such a manner as to conceal the identity of the actual source of the contribution or the actual recipient and purpose of the expenditure.

The MEC's investigation determined that Ms. Gastreich has a limited liability company. Campaign finance reports filed by her candidate committee include expenditures paid to that company for printing services. The company outsourced some of those printing functions, but there is no requirement that committees report information pertaining to subcontractors. Further, the investigation included a review of the subcontractor's invoices and found no evidence to suggest the committee had reported its expenditures in such a manner as to conceal the actual recipient or purpose of its expenditures.

With respect to the "Paid for by" allegation: Section 130.031.8, RSMo requires:

Any person publishing, circulating, or distributing any printed matter relative to a candidate for public office . . . shall on the fact of the printed matter identify in a clear and conspicuous manner the person who paid for the printed matter with the words "Paid for by" following by the proper identification of the sponsor pursuant to this section.

The complaint alleged that the "Paid for by" disclosure on an endorsement letter from an elected official should have identified the official as the sponsor. However, it was the candidate committee that created and distributed the endorsement letter, with authorization from the elected official of course. Accordingly, the "Paid for by" disclosure accurately identified the candidate committee as the sponsor, and there was no in-kind contribution to report.

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

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