



# OFFICIAL COMPLAINT FORM

Missouri Ethics Commission  
PO Box 1370  
Jefferson City, MO 65102-1370

Section 105.957, RSMo states that the Commission shall receive any complaints alleging violations of the provisions of:

- 1) The requirements imposed on lobbyists by section 105.470 to 105.478;
- 2) The financial interest disclosure requirements contained in sections 105.483 to 105.492;
- 3) The campaign finance disclosure requirements contained in chapter 130, RSMo;
- 4) Any code of conduct promulgated by any department, division or agency of state government, or by state institutions of higher education, or by executive order;
- 5) The conflict of interest laws contained in sections 105.450 to 105.467 and section 171.181, RSMo; and
- 6) The provisions of the constitution or state statute or order, ordinance or resolution of any political subdivision relating to the official conduct of officials or employees of the state and political subdivisions.

This complaint shall contain all the facts known to the person bringing the complaint that give rise to the complaint.

This complaint shall be sworn to under penalty of the crime of perjury.

Within 5 days of receipt of this complaint, the Commission will send a copy of this complaint, including the name of the person bringing this complaint, to the person, organization or campaign committee against whom the complaint is brought.

**Note:** According to Missouri State Law, the Commission shall dismiss any complaint which is frivolous in nature, as lacking any basis in fact or law. Any person who submits a frivolous complaint shall be liable for actual and compensatory damages to the alleged violator for holding the alleged violator before the public in a false light. A finding by the Commission that a complaint is frivolous or without probable cause shall be a public record.

**THIS FORM MUST BE RETURNED BY MAIL OR HAND-DELIVERED. FAXED COPIES OR EMAILS WILL NOT BE ACCEPTED.**

### PART 1 - PERSON BRINGING COMPLAINT:

NAME: <b>Roy Temple</b>		DATE OF COMPLAINT: <b>08/03/2016</b>	
ADDRESS: <b>208 Madison Street, P.O. Box 719</b>			
CITY: <b>Jefferson City</b>	STATE: <b>MO</b>	COUNTY: <b>Cole</b>	ZIP: <b>65101</b>
CONTACT PHONE NUMBER/S: (HOME)	(WORK) <b>573-636-5241</b>	(CELL)	
TITLE OF OFFICE HELD OR SOUGHT (IF APPLICABLE): <b>N/A.</b>			

### PART 2 - ORGANIZATION OR CAMPAIGN COMMITTEE AND INDIVIDUAL(S) OR POSITION(S) AGAINST WHOM

#### THIS COMPLAINT IS BEING BROUGHT AGAINST:

NAME: <b>LG PAC</b>			
ADDRESS: <b>520 WEST 103RD STREET, SUITE 243</b>			
CITY: <b>KANSAS CITY</b>	STATE: <b>MO</b>	COUNTY: <b>Jackson</b>	ZIP: <b>64114</b>
CONTACT PHONE NUMBER/S: (HOME) <b>913 226 8812</b>	(WORK) <b>913 226 8812</b>		
TITLE OF OFFICE HELD OR SOUGHT (IF APPLICABLE): <b>N/A.</b>			
DATE OF ELECTION (IF APPLICABLE): <b>08/02/2016</b>	CHECK ELECTION TYPE (IF APPLICABLE): <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General		

#### VERIFICATION BY OATH OR AFFIRMATION

STATE OF MISSOURI  
COUNTY OF Jackson

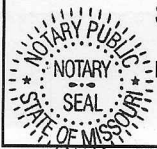
I, Roy Temple, being duly sworn upon oath and affirmation legally administered, certify under penalty of perjury that the foregoing information in this complaint is complete, true, and correct, to the best of my knowledge and belief.

[Signature]  
Signature of Complainant

Subscribed and sworn to before me this 3rd day of August, 2016.

STEFANI J. BRANCATO  
My Commission Expires May 17, 2017  
Jackson County  
Commission #13712576

[Signature]  
Notary Public





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#### THIS COMPLAINT IS BEING BROUGHT AGAINST:

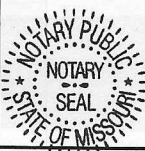
NAME: <b>Freedom Frontier</b>			
ADDRESS: <b>P.O. Box 341016</b>			
CITY: <b>Austin</b>	STATE: <b>TX</b>	COUNTY: <b>Travis</b>	ZIP: <b>78734</b>
CONTACT PHONE NUMBER/S: (HOME) <b>Unknown.</b>	(WORK) <b>Unknown.</b>		
TITLE OF OFFICE HELD OR SOUGHT (IF APPLICABLE): <b>N/A.</b>			
DATE OF ELECTION (IF APPLICABLE): <b>08/02/2016</b>	CHECK ELECTION TYPE (IF APPLICABLE): <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General		

#### VERIFICATION BY OATH OR AFFIRMATION

STATE OF MISSOURI  
COUNTY OF **Jackson**

I, **Roy Temple**, being duly sworn upon oath and affirmation legally administered, certify under penalty of perjury that the foregoing information in this complaint is complete, true, and correct, to the best of my knowledge and belief.

**Roy Temple**  
Signature of Complainant



Subscribed and sworn to before me this **3rd** day of **August**, **2016**.

My Commission Expires **May 17, 2017**

Jackson County  
Commission #13712576

**Stefani Brancato**  
Notary Public



**BEFORE THE  
MISSOURI ETHICS COMMISSION**

**IN THE MATTER OF:    LG PAC  
                                  FREEDOM FRONTIER**

**COMPLAINT**

LG PAC and Freedom Frontier engaged in a series of transactions for the purpose of concealing the identity of actual donors in violation of Missouri law. LG PAC then used the dark money to support Eric Greitens in the Republican primary election held on August 2, 2016.

This complaint is filed with the Missouri Ethics Commission in accordance with Missouri Rev. Stat. § 130.054, in the belief that LG PAC has violated Missouri’s campaign finance law.

1. Missouri law prohibits political committees from accepting contributions made “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”. Missouri Rev. Stat. § 130.031(3).
2. On May 16, 2016, in an attempt to avoid Missouri’s campaign finance law actual donor disclosure requirements, LG PAC registered as a political committee with the Federal Election Commission instead of with the Missouri Ethics Commission.<sup>1</sup>
3. LG PAC reported that it received contributions totaling \$2,300,000 from “Freedom Frontier” but it did not disclose the identity of the actual source of the contributions. Instead, LG PAC concealed the identity of the actual donors by only listing Freedom Frontier on its FEC report, as follows:<sup>2</sup>

<u>Donor</u>	<u>Date of Receipt</u>	<u>Amount</u>
Freedom Frontier P.O. Box 341016 Austin, TX 78734	06-01-2016	\$1,500,000
Freedom Frontier P.O. Box 341016 Austin, TX 78734	06-22-2016	\$300,000
Freedom Frontier P.O. Box 341016 Austin, TX 78734	06-29-2016	\$500,000

<sup>1</sup> See Attachment A, LG PAC’s FEC Statement of Organization filed May 16, 2016, with amendments filed on May 19 and June 16, 2016.


<sup>2</sup> See Attachment B, LG PAC FEC July Quarterly Report listing three contributions from Freedom Frontier.

5. LG PAC used the funds from the concealed donors to pay for more than \$2.2 million in television advertisements supporting Eric Greitens' campaign for governor shortly before the Republican primary held on August 2, 2016.<sup>3</sup>
6. LG PAC's television ads supporting Eric Greitens can be viewed online.<sup>4</sup>
7. LG PAC did not disclose any other donor information on its FEC report.
8. LG PAC violated Missouri Rev. Stat. § 130.031(3) by accepting contributions from Freedom Frontier for the purpose of influencing Missouri elections in a manner that concealed the actual source of the funds.

### Conclusion

I respectfully request that the Missouri Ethics Commission investigate LG PAC and Freedom Frontier for concealing the actual source of the funds contributed to LG PAC in violation of Missouri Rev. Stat. § 130.031(3).

Complaint made by:

  
s/ Roy Temple

Date: 8/3/16

<sup>3</sup> See Attachment B, LG PAC FEC report with "Media Buys" totaling \$2,214,534.

<sup>4</sup> LG PAC ads available at:

[http://mycmag.kantarmediana.com/KMIcmagvidbin2/GOV\\_MO\\_LGPAC\\_SWEET\\_DEAL.html](http://mycmag.kantarmediana.com/KMIcmagvidbin2/GOV_MO_LGPAC_SWEET_DEAL.html));

<https://www.youtube.com/watch?v=vcxwQSuzT6U>);

[http://mycmag.kantarmediana.com/KMIcmagvidbin2/GOV\\_MO\\_LGPAC\\_TAXPAYER\\_RIPOFFS\\_15.html](http://mycmag.kantarmediana.com/KMIcmagvidbin2/GOV_MO_LGPAC_TAXPAYER_RIPOFFS_15.html));

[http://mycmag.kantarmediana.com/KMIcmagvidbin2/GOV\\_MO\\_LGPAC\\_CONCEAL\\_AND\\_CARRY\\_15.html](http://mycmag.kantarmediana.com/KMIcmagvidbin2/GOV_MO_LGPAC_CONCEAL_AND_CARRY_15.html)).