



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

PART 2 - ORGANIZATION OR CAMPAIGN COMMITTEE AND INDIVIDUAL(S) OR POSITION(S) AGAINST WHOM THIS COMPLAINT IS BEING BROUGHT AGAINST:

NAME: LG PAC, and Richard Monsees in his capacity as Treasurer			
ADDRESS: 520 WEST 103RD STREET, SUITE 243			
CITY: KANSAS CITY	STATE: MO	COUNTY: Jackson	ZIP: 64414
CONTACT PHONE NUMBER/S: (HOME) 913 226 8812	(WORK) 913 226 8812		
TITLE OF OFFICE HELD OR SOUGHT (IF APPLICABLE): N/A.			
DATE OF ELECTION (IF APPLICABLE): 08/02/2016		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

Stephanie Brando
Notary Public

**BEFORE THE
MISSOURI ETHICS COMMISSION**

**IN THE MATTER OF: ERIC GREITENS
 GREITENS FOR MISSOURI
 RICHARD MONSEES
 LG PAC**

COMPLAINT

Greitens for Missouri appears to have violated Missouri law by failing to report in-kind contributions of more than \$5,000 it received from LG PAC. LG PAC engaged in expenditures on behalf of Missouri gubernatorial candidate Eric Greitens, which appear to have been made in coordination or cooperation with Greitens or Greitens for Missouri. Coordinated expenditures are contributions that must be reported by a candidate's campaign committee.

This complaint is filed with the Missouri Ethics Commission ("MEC") in accordance with Missouri Rev. Stat. § 130.054, in the belief that Greitens For Missouri has violated Missouri's campaign finance law.

1. Expenditures that are made in "coordination or consultation" with a candidate or their agents are considered in-kind contributions. Missouri Rev. Stat. § 130.047.
2. The Missouri Ethics Commission has held that expenditures made with the "design, control or influence", the "consent, coordination or control" of the candidate, or made with the prior knowledge of the candidate are a contribution to that candidate. Missouri Ethics Commission Advisory Opinions 1996.01.110 (February 5, 1996); 2000.05.100 (May 15, 2000); 2004.03.100 (March 15, 2004).
3. Additionally, expenditures "requested to be made by, directed or controlled by, or made in cooperation with, or made with the express or implied consent of the candidate" are also contributions to that candidate. Missouri Ethics Commission Advisory Opinion 1996.06.135 at 1 (July 12, 1996), citing Buckley v. Valeo, 424 U.S. 1, 78 (1976); see also Advisory Opinion 1996.07.138 (July 31, 1996).
4. LG PAC is political committee that registered with the Federal Election Commission on May 16, 2016.¹
5. LG PAC's Treasurer is Richard Monsees.
6. On May 19, 2016, LG PAC Treasurer Richard Monsees was photographed with Greitens.²

¹ See Attachment A, LG PAC FEC Statement of Organization filed May 16, 2016, with amendments filed on May 19 and June 6, 2016.


² See Attachment B, KMBC.com, "Eric Greitens: Gubernatorial campaign has no relationship with PAC treasurer - Photo of men together at May 19 event raised questions" (June 21, 2016).

7. On June 2, 2016, LG PAC began making expenditures for media buys supporting Greitens' campaign for governor.³
8. LG PAC made at least four express advocacy television advertisements attacking Greitens' opponents, and supporting Greitens, before the August 2, 2016 primary election.⁴
9. On or about June 18, 2016, LG PAC Treasurer Richard Monsees attended another small event for Greitens' campaign.⁵
10. Based on the timing of the LG PAC treasurer's apparent meetings and conversations with Eric Greitens and his campaign, it appears that LG PAC's television ads were made in "coordination or consultation" with Greitens or his campaign, or both.
11. Candidates are required to file a report with the MEC within 48 hours of receiving a contribution above \$5,000. Missouri Rev. Stat. § 130.044(1).
12. Greitens' campaign did not file any reports disclosing in-kind contributions of more than \$5,000 received from LG PAC.

Conclusion

I respectfully request that the Missouri Ethics Commission investigate Eric Greitens, Richard Monsees, Greitens for Missouri, and LG PAC to determine if coordinated contributions of more than \$5,000 were received by Greitens for Missouri but not disclosed within 48-hours of receipt in violation of Missouri Rev. Stat. § 130.044(1).

Complaint made by:


Roy Temple

Date: 8/3/16

³ See Attachment C, LG PAC FEC July Quarterly Report of media buy expenditures totaling more than \$2 million.

⁴ See Advertisements on 6/21/2016 (video available at http://mycmag.kantarmediana.com/KMIcmagvidbin2/GOV_MO_LGPAC_SWEET_DEAL.html); 7/15/2016 (video available at <https://www.youtube.com/watch?v=vcxwQSUzT6U>); 7/19/2016 (video available at http://mycmag.kantarmediana.com/KMIcmagvidbin2/GOV_MO_LGPAC_TAXPAYER_RIPOFFS_15.html); and 7/19/2016 (video available at http://mycmag.kantarmediana.com/KMIcmagvidbin2/GOV_MO_LGPAC_CONCEAL_AND_CARRY_15.html)

⁵ See Attachment D, Missouri Times, "New information links LG PAC and Greitens" (June 18, 2016).