



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: Eric Greitens, Greitens For Missouri
ADDRESS: 4579 Laclede Ave #138
CITY: St. Louis STATE: MO COUNTY: St. Louis ZIP: 63108
CONTACT PHONE NUMBER/S: (HOME) (314) 899-0288 (WORK) (314) 899-0288
TITLE OF OFFICE HELD OR SOUGHT (IF APPLICABLE): Governor
DATE OF ELECTION (IF APPLICABLE): 08/02/2016 CHECK ELECTION TYPE (IF APPLICABLE): [x] Primary [] General

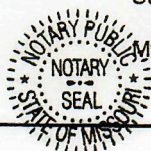
VERIFICATION BY OATH OR AFFIRMATION

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 of Complainant (Handwritten signature of Roy Temple)

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



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

Signature of Notary Public (Handwritten signature of Stefani J. Brancato)



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

NAME: SEALS for Truth
ADDRESS: PO Box 29525
CITY: Washington STATE: DC COUNTY: Washington ZIP: 20017
CONTACT PHONE NUMBER/S: (HOME) 314 720 1524 (WORK) 314 720 1524
TITLE OF OFFICE HELD OR SOUGHT (IF APPLICABLE): N/A.
DATE OF ELECTION (IF APPLICABLE): 08/02/2016 CHECK ELECTION TYPE (IF APPLICABLE): [x] Primary [] General

VERIFICATION BY OATH OR AFFIRMATION

STATE OF MISSOURI
COUNTY OF Jackson
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Signature of Complainant

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



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

Notary Public

PART 3 - STATEMENT OF FACTS:

State in your own words the detailed facts and the actions of the candidate or organization named in part two which prompted you to make this complaint. The space provided below is not intended to limit your statement of facts. Please use additional sheets if necessary. Include relevant dates and times, and the names and addresses of other persons whom you believe have knowledge of the facts and attach hereto copies of any documentary evidence that supports the facts alleged in the complaint.

Please check the box next to the area that the complaint concerns.

- 1. The requirements imposed on lobbyists by sections 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.
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- 5. The conflict of interest laws contained in sections 105.450 to 105.467 and section 171.181, RSMo.
- 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.

PLEASE STATE THE FACTS BELOW:

See attached complaint.

YES Are any of the matters alleged by you the subject of civil or criminal litigation? If yes, please provide
 NO the county and case number if known by you. _____

BEFORE THE
MISSOURI ETHICS COMMISSION

IN THE MATTER OF: ERIC GREITENS
GREITENS FOR MISSOURI
SEALS FOR TRUTH

COMPLAINT

Gubernatorial-candidate Eric Greitens, his campaign committee Greitens for Missouri (collectively “Greitens”), and SEALs For Truth (“SEALs”) engaged in a series of transactions with the intent to conceal the identity of donors in violation of Missouri law prior to the Missouri republican primary election. SEALs used the dark money to make a \$1.975 million donation to Greitens.

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

1. Missouri law prohibits contributions or expenditures 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 June 15, 2016, for the purpose of concealing its donors prior to the August 2, 2016 primary election, SEALs registered as a political committee with the Federal Election Commission instead of with the Missouri Ethics Commission.¹
3. SEALs filed its first report with the FEC on July 15, 2016 for the period ending June 30, 2016. SEALs report did not disclose any donors.²
4. Between July 1 and July 18, 2016, SEALs raised at least \$1,975,000.
5. On July 18, 2016, SEALs used undisclosed funds to make a \$1,975,000 contribution to Greitens for Missouri.³
6. The dark money contribution from SEALs to Greitens is the largest campaign contribution ever made in Missouri history.⁴

¹ See Attachment A, SEALs’ FEC Statement of Organization dated June 15, 2016.

² See Attachment B, SEALs’ FEC July Quarterly Report.

³ See Attachment C, Greitens for Missouri – 7.25.2016 Report disclosing SEALs’ contribution.

⁴ See Attachment D, St. Louis Post-Dispatch, “Who made the biggest political donation in Missouri history? Ask after the election” (July 20, 2016), Attachment E, St. Louis Post-Dispatch, “Editorial: Of all people, ex-Navy SEALs should have the courage not to hide political money” (July 20, 2016); Attachment F, Riverfront Times, “Eric Greitens Nabs Single Largest Campaign Contribution in Missouri History” (July 21, 2016).

7. Political committees were required to file pre-primary disclosure reports with the Missouri Ethics Commission on July 25, 2016 for the period ending July 21 disclosing the actual source of their contributions. Missouri Rev. Stat. § 130.046.1.
8. The actual source of the funds used to make the \$1.975 million contribution was not disclosed by Greitens or SEALs before the primary election.
9. Greitens and SEALs structured their transactions “in such a manner as to conceal the identity of the actual source of the contribution” in violation of Missouri Rev. Stat. § 130.031(3).

Conclusion

I respectfully request that the Missouri Ethics Commission investigate Eric Greitens, Greitens for Missouri, and SEALs For Truth for acting in a manner to conceal the identity of the actual source of the \$1.975 million dollar contribution made in violation of Missouri Rev. Stat. § 130.031(3).

Complaint made by:

/s/ 
Roy Temple

Date: 8/3/16