



**MISSOURI ETHICS COMMISSION**

P.O. Box 1254

Jefferson City, MO 65102

[www.mec.mo.gov](http://www.mec.mo.gov)

(573) 751-2020 / (800) 392-8660

James Klahr  
Executive Director

November 2, 2016

Michael Adams  
Chalmers Pak Burch and Adams LLC  
1300 Pennsylvania Ave NW #190-612  
Washington DC 20004

MEC No. 16-0074-I Greitens for Missouri, Eric Greitens

Dear Mr. Adams:

Attached is correspondence for the above mentioned case. Please feel free to contact our office should you have any questions.

Sincerely,

  
James Klahr  
Executive Director



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James Klahr  
Executive Director

November 2, 2016

Eric Greitens  
Greitens for Missouri  
4522 Maryland Ave  
St. Louis MO 63108

Re: File No. 16-0074-I

Dear Mr. Greitens:

The Missouri Ethics Commission considered the complaint filed against you at its November 2, 2016 meeting. The Commission reviewed the allegation that your committee accepted a contribution from SEALs for Truth in a manner to conceal the actual source of the contribution in violation of Section 130.031.3, RSMo.

Greitens of Missouri registered with MEC as an exploratory committee on February 24, 2015. The committee later amended its Statement of Committee Organization on October 1, 2015 as a candidate committee.

Staff review of the complaint determined that Greitens for Missouri reported receiving a \$1.975 million contribution from SEALs for Truth on a 48 Hour Disclosure Report filed with the MEC on July 18, 2016. The report indicated that the contribution was received on July 18, 2016.

On October 14, 2016, SEALs for Truth filed its October Quarterly Report with the FEC. This report covered activity for the period July 1, 2016 through September 30, 2016. The report showed that SEALs for Truth received a \$2 million contribution from American Policy Coalition, Inc. on July 18, 2016. The report also reflected that SEALs for Truth made a \$1.975 million contribution to Greitens for Missouri on July 18, 2016.

Section 130.031.3, RSMo, provides:

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. Any person who receives contributions for a committee shall disclose to that committee's treasurer, deputy treasurer or candidate the recipient's own name and address and the name and address of the actual source of each contribution such person has received for that committee. Any person who makes expenditures for a committee shall disclose to that committee's treasurer, deputy treasurer or candidate such person's own name and address, the name



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and address of each person to whom an expenditure has been made and the amount and purpose of the expenditures the person has made for that committee.

When it filed its Statement of Organization and when it has filed subsequent reports, SEALs for Truth identifies its address as P.O. Box 29525, Washington, D.C. 20017. It lists the Treasurer as Nicholas Britt at the same address on the Statement of Organization and on subsequent reports filed with the FEC.

SEALs for Truth is a federal Political Action Committee that filed a Statement of Organization with the FEC on June 15, 2016. Greitens for Missouri timely filed a 48 Hour Report indicating that it received a contribution from SEALs for Truth on July 18, 2016. SEALs for Truth later timely filed a report with FEC showing that it made that same contribution to Greitens for Missouri. There is no evidence that Greitens for Missouri violated Section 130.031.3, RSMo, when it reported receiving the contribution from SEALs for Truth.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "James Klahr".

James Klahr

Executive Director



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James Klahr

Executive Director

November 2, 2016

Jeff Stuerman  
Greitens for Missouri  
4579 Laclede Ave #138  
St Louis MO 63108

Re: File No. 16-0074-I

Dear Mr. Stuerman:

The Missouri Ethics Commission considered the complaint filed against Greitens for Missouri at its November 2, 2016 meeting. The Commission reviewed the allegation that Greitens for Missouri accepted a contribution from SEALs for Truth in a manner to conceal the actual source of the contribution in violation of Section 130.031.3, RSMo.

Greitens of Missouri registered with MEC as an exploratory committee on February 24, 2015. The committee later amended its Statement of Committee Organization on October 1, 2015 as a candidate committee.

Staff review of the complaint determined that Greitens for Missouri reported receiving a \$1.975 million contribution from SEALs for Truth on a 48 Hour Disclosure Report filed with the MEC on July 18, 2016. The report indicated that the contribution was received on July 18, 2016.

On October 14, 2016, SEALs for Truth filed its October Quarterly Report with the FEC. This report covered activity for the period July 1, 2016 through September 30, 2016. The report showed that SEALs for Truth received a \$2 million contribution from American Policy Coalition, Inc. on July 18, 2016. The report also reflected that SEALs for Truth made a \$1.975 million contribution to Greitens for Missouri on July 18, 2016.

Section 130.031.3, RSMo, provides:


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. Any person who receives contributions for a committee shall disclose to that committee's treasurer, deputy treasurer or candidate the recipient's own name and address and the name and address of the actual source of each contribution such person has received for that committee. Any person who makes expenditures for a committee shall disclose to that committee's treasurer, deputy treasurer or candidate such person's own name and address, the name and address of each person to whom an expenditure has been made and the amount and purpose of the expenditures the person has made for that committee.

When it filed its Statement of Organization and when it has filed subsequent reports, SEALs for Truth identifies its address as P.O. Box 29525, Washington, D.C. 20017. It lists the Treasurer as Nicholas Britt at the same address on the Statement of Organization and on subsequent reports filed with the FEC.

SEALs for Truth is a federal Political Action Committee that filed a Statement of Organization with the FEC on June 15, 2016. Greitens for Missouri timely filed a 48 Hour Report indicating that it received a contribution from SEALs for Truth on July 18, 2016. SEALs for Truth later timely filed a report with FEC showing that it made that same contribution to Greitens for Missouri. There is no evidence that Greitens for Missouri violated Section 130.031.3, RSMo, when it reported receiving the contribution from SEALs for Truth.

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

Sincerely,



James Klahr  
Executive Director