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FEDERAL ELECTION
COMMISSION

BEFORE THE

2016 NOV 14 AM 10:35

FEDERAL ELECTION COMMISSION

In the matter of:

OFFICE OF GENERAL

Eric Greitens,

Greitens for Missouri, and

MUR # _____

Jeff Stuermer, its Treasurer

MUR # 7197

COMPLAINT

There is reason to believe that state candidate Eric Greitens violated Federal law when his campaign committee, Greitens for Missouri, paid for get-out-the-vote public communications supporting a candidate for Federal office with funds from his Missouri campaign committee that were not subject to the Federal limitations, prohibitions, and reporting requirements.

1. This complaint is filed with the Federal Election Commission (the "FEC") in accordance with the provisions of 52 U.S.C. § 30109(a)(1) in the belief that Eric Greitens, Greitens for Missouri, and its treasurer, Jeff Stuermer, violated provisions of the Federal Election Campaign Act of 1971, 52 U.S.C. §30101 *et seq* (the "Act").
2. State candidates may not use their campaign funds for certain public communications promoting Federal candidates unless the funds used to pay for the communications "are subject to the limitations, prohibitions, and reporting requirements of" the Act. 52 U.S.C. § 30141(f)(1).
3. Communications that must be paid for with funds subject to the limitations, prohibitions, and reporting requirements of the Act include: "get-out-the-vote activity ... conducted in connection with an election in which a candidate for Federal office appears on the ballot" and "a public communication that refers to a clearly identified candidate for Federal office ...that promotes or supports a candidate for that office..." 52 U.S.C. §§ 30101(20)(A)(ii) and (iii).
4. Under Missouri law, state candidates may accept contributions in unlimited amounts far above the \$2,700 Federal candidate limit; from sources, such as corporations, that are prohibited from making Federal contributions; and, they are not subject to the Act's reporting requirements.

5. Greitens for Missouri accepted contributions above the Federal candidate limit, from sources prohibited from making Federal contributions, and it is not subject to the Act's reporting requirements. *See* Greitens for Missouri [disclosure report dated 9/1/2016 – need cover sheet and example of non-federal contributions above federal limit – \$25,000 from Missouri Chamber PAC 8/26/16, \$2,500,000 from Republican Governors Association Missouri 8/26/16, \$25,000 from Digital Monitoring Products 8/26/16, \$5,000 From Scrivener Oil Company Inc 8/26/16, \$50,0000 From FTC Capital LLC 8/25/16; etc]
6. In October 2016, Greitens for Missouri paid for a communication that includes a photograph of Vice Presidential candidate Mike Pence with the following message:

VOTE NOVEMBER 8TH
TRUMP
PENCE

7. The Greitens for Missouri communication (the "GOTV Trump Mail Piece") includes a get-out-the-vote message and it promotes clearly identified candidates for Federal office. *See* Greitens mail piece attached as Exhibit A
8. There is reason to believe that Eric Greitens and Treasurer Jeff Steurman used Greitens for Missouri campaign funds that were *not* subject to the limitations, prohibitions, and reporting requirements of the Act to pay for the GOTV Trump Mail Piece.

I respectfully request that the Commission find reason-to-believe that a violation occurred and investigate this matter to determine the full nature and extent of the Federal law violations.

Respectfully submitted,

/s/ 
By: Crystal Brinkley

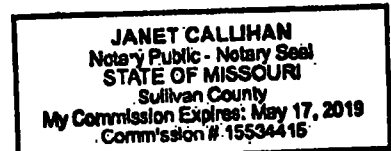
208 Madison St, Jefferson City, MO 65101

State of Missouri
County of Sullivan

Subscribed and sworn to before me on November 2, 2016.


Notary Public

My Commission Expires: 5-17-2019



Mike Parson
for Lieutenant Governor

4579 Laclede Ave #138
St. Louis, MO 63108



NAVY SEAL. OUTSIDER. NOT A CAREER POLITICIAN.

