



Missouri Ethics Commission (MEC)
PO Box 1370, Jefferson City, MO 65102, (800) 392-8660 www.mec.mo.gov
Official Complaint Form (Sections 105.957 & 130.054, RSMo, & MO Const.)

Office Use:

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

INDIVIDUAL BRINGING COMPLAINT: (must be a natural person)		
DATE OF COMPLAINT: 7/20/2026	NAME: (First & Last) Andy Bakker	TITLE OF OFFICE HELD OR SOUGHT (if applicable):
ADDRESS: (required) PO Box 410371		EMAIL: andy@libertyallianceusa.com
CITY, STATE & ZIP: (required) Kansas City, MO 64141		COUNTY: Jackson
WORK PHONE: () 773-937-9309	HOME PHONE: ()	CELL PHONE: ()

The Commission will send a copy of this complaint, which includes the name of the person bringing the complaint, to the organization(s), committee(s), or individual(s) against whom the complaint is brought.

INDIVIDUAL(S) AND/OR ORGANIZATION(S) OR COMMITTEE(S) AGAINST WHOM COMPLAINT BROUGHT: (Please limit filing to those individuals and/or entities against whom the specific complaint is alleged. File separate complaints if alleging violations of a similar nature against separate and distinct individuals/organizations/committees/entities. Use additional pages if necessary.)		
NAME: Nathan Willett for Missouri		TITLE OF OFFICE HELD OR SOUGHT (if applicable): Missouri State Senate (terminated)
ADDRESS: (required) PO Box 20625 156 Paris St		EMAIL:
CITY, STATE & ZIP: (required) Kansas City MO 64153		COUNTY: Clay
WORK PHONE: () 309-431-0719		CELL PHONE: ()

NAME:		TITLE OF OFFICE HELD OR SOUGHT (if applicable):
ADDRESS: (required)		EMAIL:
CITY, STATE & ZIP: (required)		COUNTY:
WORK PHONE: ()		CELL PHONE: ()

VERIFICATION BY OATH OR AFFIRMATION
This complaint shall be sworn to under penalty of perjury.

STATE OF MISSOURI

COUNTY OF Jackson

I, Andy Bakker being duly sworn upon oath and affirmation legally administered,
(Complainant Name)

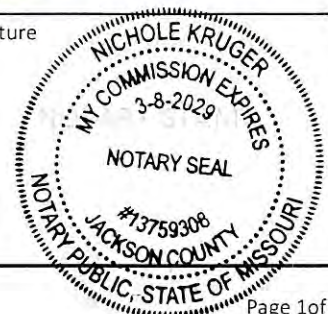
certify under penalty of perjury that the information contained in this complaint is complete, true, and correct, to the best of my knowledge and belief.


Complainant Signature

Subscribed and sworn to before me this 20th day of July, 2026.

My Commission Expires: 3/8/2029


Notary Public Signature



Please check one or more boxes next to the area(s) which you believe this complaint concerns:

- ☐ 1) The requirements imposed on lobbyists contained in Sections 105.470 to 105.478, RSMo;
- ☐ 2) The financial interest disclosure requirements contained in Sections 105.483 to 105.492, RSMo;
- ☒ 3) The campaign finance disclosure requirements contained in Chapter 130, RSMo and the Missouri Constitution;
- ☐ 4) Article VIII, Section 23, of the Missouri Constitution (complaints relating to campaign finance can only be filed against a candidate within 60 days prior to the primary election until after the general election in which the candidate is running but not within the 15 days prior to the election);
- ☐ 5) The conflict of interest laws contained in Sections 105.450 to 105.467, RSMo, and Section 171.181, RSMo;
- ☐ 6) 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;
- ☐ 7) 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.

State in your own words the facts and actions which prompted you to make this complaint.
Attach any documents that support this complaint. Include relevant dates, times, and the names and
contact information of other persons whom you believe have knowledge of the facts.

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

The space provided below is not intended to limit your statement of facts. Please use additional pages if necessary.

See attached complaint.

STATEMENT OF FACTS

1. Nathan Willett was a candidate for the Missouri State Senate, and Nathan Willett for Missouri (M.E.C. ID No. A222398) was organized as his candidate committee under Chapter 130, RSMo. Willett served as the committee's deputy treasurer; James Hall, M.D. served as treasurer of record. Hall is Willett's grandfather.
2. In late March 2026, Willett became a candidate for the U.S. House of Representatives, Missouri's 6th Congressional District. On April 30, 2026, Nathan Willett for Missouri filed a Committee Disclosure Report Cover Page marked "TERMINATION" with the Missouri Ethics Commission, together with Form CO-3 (Committee Termination Statement), Form CD Summary, Form CD1, Form CD1B, Form CD3, Form CD3 Supplemental A, Form CD-8, and three Addendum Statements (collectively, the "Termination Filing"). The Termination Filing's Form CO-3 certifies, under the signatures of both the treasurer and the candidate, that the committee was dissolved that day and that "all requirements for termination under Sections 130.021.8 and 130.046.7 RSMo have been met." Item 6 of Form CO-3, "Distribution of Surplus Funds," is checked "CHECK IF NO SURPLUS REMAINED UPON TERMINATION," with no distribution itemized.
3. That representation was false. The committee's Form CD3, filed the same day, itemizes under "Contributions Made (Regardless of Amount)" a \$165,384.46 payment dated April 30, 2026 to "Grassroots America Inc," 11770 Haynes Bridge Rd, Alpharetta, GA 30009. The committee's Form CD Summary confirms this payment as part of "Total Contributions Made This Period," reducing the committee's cash on hand from \$190,936.13 at the start of the period to exactly \$0.00 by its close.
4. Grassroots America Inc. ("GAI") is a Georgia-registered, IRS-recognized 501(c)(4) nonprofit organization, EIN 88-2873007, with no apparent connection to Missouri politics, Missouri state or local candidates, or Willett's Missouri Senate constituency. GAI's own IRS filings show it to be a small organization: its Form 990-EZ for tax year 2022 reported total revenue of \$9,784 and total assets of \$790, and its subsequent Form 990-N filings for 2023 and 2024 reported gross receipts not exceeding \$50,000 in either year.

5. On June 18, 2026, GAI paid \$160,384.46 to Conservative Future Fund, a federal independent-expenditure-only committee, FEC ID C00878264, organized to support federal candidates including Willett. Conservative Future Fund's FEC Form 3X, filed July 15, 2026, discloses this payment as the largest single contribution it received that reporting period. The \$165,384.46 GAI received from Nathan Willett for Missouri and the \$160,384.46 it paid to Conservative Future Fund differ by exactly \$5,000.00, a pattern consistent with GAI functioning as a pass-through, retaining a fee or administrative charge, for funds moving from Willett's Missouri committee to a federal Super PAC formed to support his federal candidacy.
6. GAI's treasurer and principal officer, per its own IRS filings, is Jason D. Boles, who simultaneously serves as treasurer of Willett's federal candidate committee, Nathan Willett for Congress, FEC ID C00945584. Boles is also President and CEO of Tabularius Compliance LLC, a for-profit political compliance and treasury-services firm operating from the same addresses GAI uses. Nathan Willett for Congress paid Tabularius \$5,500.00 during the same period as the transactions described above. Neither Boles nor Tabularius performed any services for, or had any relationship with, Nathan Willett for Missouri before Willett's 2026 federal candidacy.
7. Willett announced his candidacy for the U.S. House of Representatives on or about March 30, 2026. Willett personally exercised, and continues to exercise, direct and actual control over Nathan Willett for Missouri's disbursements. The committee's Addendum Statements itemize six "Returned Donation" disbursements totaling \$14,400.00 to eight named donors, reflecting that all eight had requested refunds of their contributions to the state committee after Willett's federal candidacy announcement. The committee issued checks to these donors beginning as early as April 2, 2026, already after Willett had become a federal candidate, drawn on the committee's own account at Central Bank. Some of these checks cleared. Others bounced and were returned for insufficient funds.
8. Documentary proof of this exists for several donors, see attached Exhibit C. Committee check number 1029, dated April 2, 2026, drawn on the committee's account at Central Bank and signed by Willett, was issued in the amount of \$2,400.00 to a donor requesting a refund, with the memo line "Refund." Exhibit C, with payee name redacted. A Notice of

Charge Back Items from Connections Bank, dated May 25, 2026, and a legal copy of the returned check bearing a bank processing date of May 20, 2026, confirm that a corresponding \$2,400.00 check drawn on the committee's Central Bank account was returned for "NOT SUFFICIENT FUNDS." Exhibit C, with payee name redacted.

9. The committee's checks, including the check described in Paragraph 8 above, were returned for insufficient funds because the committee's account had been depleted by the \$165,384.46 transfer to Grassroots America Inc. that Willett personally directed on April 30, 2026, as alleged in Paragraphs 3 through 6 above. The committee's checks to its donors were written beginning April 2, 2026, before the GAI transfer; the account's inability to honor them, confirmed by the bank's own May 2026 records, arose only after Willett removed the substantial majority of the account's funds on April 30, 2026. Willett was the person who caused that \$165,384.46 outflow; he was accordingly the person best positioned to know, at the time he directed it, that the account held outstanding, uncashed refund checks to the committee's own donors that the transfer would leave the account unable to honor. Directing the removal of the account's funds while the committee had outstanding checks in circulation to its own donors, without ensuring the account retained sufficient funds to honor them, was, at a minimum, a reckless disregard of the committee's ability to meet its known, outstanding obligations to its own donors.
10. After being alerted that the committee's checks had bounced, Willett personally issued a second round of checks to the affected donors, each dated May 18 or 19, 2026, drawn on his own personal bank account at Bank Midwest, a different financial institution entirely from the committee's Central Bank account, and personally signed by him, each in the amount of \$2,400.00, to cover the refund obligations the committee's own checks had failed to satisfy. See Exhibit C, showing images of the fronts of four such personal checks [with payee names redacted.] Willett accordingly resorted to his own personal funds, held at a bank entirely separate from the committee's own account, to make good on refund obligations the committee itself, having been left insolvent by the GAI transfer Willett had directed, could not satisfy.
11. This sequence is independent and corroborating evidence bearing on the Counts below. It demonstrates that as of April 30, 2026, the date of its certified termination, the committee

had outstanding checks to its own donors already in circulation, and that Willett's own conduct that same day rendered the account unable to honor them, directly contradicting Form CO-3's certification that the committee had no outstanding debts as of that date; it demonstrates that this insolvency was the direct and foreseeable consequence of the GAI transfer Willett himself directed, not an unrelated or unforeseeable event; it demonstrates that every one of the committee's donor-refund obligations at issue arose only after Willett was already a declared federal candidate, undercutting any suggestion that the committee's financial distress was an ordinary consequence of routine state-campaign wind-down rather than a consequence of Willett's own federal-candidacy-related decision to transfer the bulk of the committee's funds to GAI; and it demonstrates that Willett personally, not James Hall, M.D. in his capacity as treasurer of record, took responsibility for and funded the committee's unmet financial obligations to its donors when the committee itself could not. Nathan Willett for Missouri has never filed with this Commission any amendment, supplemental disclosure, or debt-satisfaction report reflecting that the committee's own refund checks were dishonored or that Willett personally satisfied the resulting debt from his own funds. This omission is a further and ongoing inaccuracy in the committee's public disclosures, addressed in Count III below.

12. This Commission has already addressed the governing framework for a Missouri committee's disposition of funds where a candidate seeks to move committee funds toward a federal campaign. In MEC Advisory Opinion No. 1995.12.159 (Dec. 6, 1995), responding to an inquiry asking whether funds could be transferred "from a committee created to run for president pro tem of the senate to a federal election campaign committee," the Commission held that "the balance of any funds in a committee organized to support" the requester's state candidacy "must be disposed of in accordance with section 130.034, RSMo." The Commission further explained that it "does not have jurisdiction over limitations on federal campaigns" and "cannot answer questions concerning limitations and gifts in federal campaigns." This Complaint follows that same framework: it asks the Commission to determine only whether the \$165,384.46 disposition complied with Section 130.034, RSMo, the Missouri-law question the Commission has already recognized as the applicable standard for a terminating committee's funds destined for federal political use. It does not ask the Commission to adjudicate Conservative Future Fund's receipt or use of

the funds, which is the subject of a separate complaint before the Federal Election Commission.

STATEMENT OF VIOLATIONS ALLEGED

Count I — Improper use of committee contributions, in violation of Section 130.034, RSMo.

13. Section 130.034.1, RSMo, provides that contributions received by a committee “shall not be converted to any personal use.” Section 130.034.2 enumerates the lawful uses of committee contributions: return to the contributor; contributions “to a political organization or candidate committee as allowed by law”; establishing a new committee under Chapter 130; an “unconditional gift which is fully vested” to a charitable, fraternal, or civic organization, provided the candidate or the candidate’s immediate family “gain no direct financial benefit”; and ordinary campaign or officeholder expenses.
14. The \$165,384.46 payment to GAI fits none of these categories. It was not a refund to a contributor. GAI is not a “political organization or candidate committee” as Chapter 130 uses those terms; it is a federal 501(c)(4) nonprofit, not a Missouri political committee or party organization, and was not itself a candidate committee to which a lawful inter-committee transfer could be made. It was not the establishment of a new committee. And to the extent it might be characterized as a charitable “gift,” it cannot be one from which the candidate derived “no direct financial benefit”: on information and belief, the funds were redirected within seven weeks to a Super PAC organized specifically to elect Willett to federal office, a benefit that inures directly to him.
15. This Commission has separately recognized that the formal legal label attached to a recipient entity does not control whether the entity should be treated, for purposes of Missouri’s campaign finance law, as functionally equivalent to a prohibited or restricted counterpart. In Advisory Opinion No. 2018.01.CF.001 (Jan. 11, 2018), the Commission looked past the fact that a federal leadership PAC is not legally “affiliated” with a federal candidate’s principal campaign committee under federal law, and held that such a PAC nonetheless operates as an “equivalent entity” to a candidate committee under Article VIII, § 23.3(4), because the PAC is “established, financed, maintained, or controlled” by the federal candidate in substance. The same interpretive approach, substance over form,

applies here. GAI's own treasurer and principal officer, Jason D. Boles, simultaneously served as treasurer of Willett's federal committee and personally owned and operated Tabularius Compliance LLC, which that same federal committee contemporaneously paid, as set out in Paragraph 6 above. GAI's \$165,384.46 receipt should accordingly be evaluated as something other than an arm's-length gift to an independent charitable organization.

16. To the extent it might be argued that Willett bears no responsibility because James Hall, M.D. was the committee's treasurer of record, that argument does not survive the facts. As set out in Paragraph 7 above, Willett personally controlled the committee's disbursements, including this one; Hall's role as treasurer of record does not change who directed the \$165,384.46 payment. Willett's status as deputy treasurer and the candidate, combined with Hall's status as Willett's grandfather, supports a finding that Willett, not Hall, is the person primarily responsible for this violation.
17. The \$165,384.46 payment was accordingly not a use of contributions "allowed by law" within the meaning of Section 130.034.2, and, to the extent it conferred a financial benefit on Willett's subsequent federal candidacy, was a conversion of committee contributions to Willett's personal political benefit in violation of Section 130.034.1. This Count applies the framework the Commission itself identified as controlling in Advisory Opinion No. 1995.12.159, and the substance-over-form approach the Commission applied in Advisory Opinion No. 2018.01.CF.001.

Count II — Inaccurate or misleading termination statement, in violation of Section 130.021, RSMo.

18. Form CO-3 represented that "no surplus remained" for distribution. The committee's own Form CD3, filed the same day, shows \$165,384.46, the overwhelming majority of the committee's terminal cash balance, being paid out as part of the same termination filing. If "surplus" is read to exclude this payment because it was labeled a routine "contribution" rather than a distribution of terminal surplus, that labeling is itself misleading: the payment constituted the substantial majority of the committee's entire remaining cash on hand and functioned, in substance, as the committee's terminal disposition of funds upon dissolution,

whatever label the committee's own forms applied to it. The termination statement's disclosures were accordingly inconsistent, incomplete, or misleading regarding "the distribution made of any remaining surplus funds," as Section 130.021 requires.

Count III — False certification of no outstanding debts, reckless disregard of the committee's known financial condition, and failure to report subsequent debt satisfaction, in violation of Section 130.021, RSMo, and Form CO-3.

19. Form CO-3, Item 7, required the committee to certify whether it had outstanding debts as of the date of termination, and to disclose the disposal of any such debts if they existed. The committee's Form CO-3, filed April 30, 2026, checked the box certifying that the committee had no outstanding debts upon termination. The committee's accompanying Addendum Statements itemized refund checks to eight named donors as the committee's own "Returned Donation" disbursements. As set forth in Paragraph 8 above, at least one such check was written weeks earlier, on April 2, 2026, and remained outstanding and uncashed as of the April 30, 2026 certification date.
20. As set forth in Paragraphs 8 and 9 above, some of those committee checks were returned for insufficient funds because Willett had, on April 30, 2026, personally directed \$165,384.46 out of the same account on which the checks were drawn. As of April 30, 2026, the date the committee certified it had no outstanding debts, the committee had in fact already issued checks to its own donors, some written nearly a month earlier, that remained outstanding and that the account, following Willett's own transfer that same day, could not honor: obligations that were, as a factual matter, both outstanding and at risk of dishonor on the date of certification. The Termination Filing does not disclose this. It reports the refunds as completed committee disbursements, without qualification, and does not disclose that any underlying checks were, or were about to be, dishonored.
21. This was not an unforeseeable event outside Willett's knowledge or control. Willett personally caused the \$165,384.46 outflow that left the account unable to honor its own donors' refund checks, including checks that had been outstanding and in circulation since as early as April 2, 2026. A candidate and deputy treasurer who personally directs the removal of the substantial majority of his committee's cash on hand, while the committee

has refund checks already outstanding to its own donors from that same account, acts with reckless disregard for whether the committee can meet its known obligations. The committee's subsequent certification that it had no outstanding debts, made without correction notwithstanding the checks Willett knew or should have known his own transfer had placed at risk of dishonor, compounds that recklessness with a certification that did not reflect the committee's actual, foreseeable financial condition.

22. Separately and independently, Willett personally issued replacement checks from his own funds, on or about May 18-19, 2026, three weeks after the certified termination date, to satisfy the obligations the committee's own checks had failed to meet, as set forth in Paragraph 10 above. Section 130.021, RSMo, requires ongoing accuracy of a committee's public filings regarding its debts and their disposition; a debt the committee owed as of its termination date, subsequently satisfied by a source other than the committee itself, is an event Section 130.021 and Form CO-3's debt-disclosure requirements require the committee to disclose. Nathan Willett for Missouri has never filed with this Commission any amendment, supplemental disclosure, or other report reflecting that its refund checks were dishonored or that Willett personally satisfied the resulting debt, as alleged in Paragraph 11 above. This omission means the public record maintained by this Commission continues to reflect, inaccurately, that the committee itself fully and properly satisfied its refund obligations to its donors, when in fact those obligations were only satisfied through Willett's personal intervention using funds outside the committee's own account, after the committee's own checks failed for a reason within Willett's own knowledge and making.
23. These are independent bases on which the committee's disclosures were, and remain, inaccurate or misleading, separate from the surplus-disclosure violation alleged in Count II above. A committee whose own checks to its donors bounced for insufficient funds as of the date it certified having no outstanding debts did not, as a factual matter, have satisfied those debts on that date, regardless of whether a candidate later made the donors whole from personal funds; and a committee's continuing failure to disclose that later personal satisfaction compounds rather than cures the original inaccuracy. Willett's signature on Form CO-3, both individually and as deputy treasurer, and Hall's signature as treasurer of

record, certified the accuracy of a filing that did not reflect the committee's actual financial condition, and neither has since corrected the record to reflect Willett's personal

REQUESTED ACTION

Complainant requests that the Commission:

- (a) Assign this Complaint to a special investigator under Section 105.961, RSMo;
- (b) Investigate the disposition of the \$165,384.46 payment to Grassroots America Inc., including the committee's underlying bank records, cancelled checks, and any correspondence concerning the decision to make that payment;
- (c) Determine whether the payment violated Section 130.034, RSMo, and whether the committee's Form CO-3 termination statement complied with Section 130.021's disclosure requirements, including its certification that the committee had no outstanding debts as of the date of termination;
- (d) Investigate the committee's refund checks to its donors reported on the Addendum Statements, including confirming which were returned for insufficient funds, the date(s) the committee or Willett learned of the returned checks, and the dates, amounts, and source of the personal checks Willett subsequently issued to satisfy those same obligations;
- (e) Determine whether Nathan Willett for Missouri was required to, and failed to, file an amendment, supplemental disclosure, or other report reflecting the dishonor of its own refund checks and Willett's personal satisfaction of the resulting debt, and whether that failure independently violates Section 130.021, RSMo;
- (f) Determine the respective responsibility of Nathan Willett and James Hall, M.D. for any violations found; and
- (g) Take such further action, including referral for civil penalties or other relief available under Chapter 130 and Section 105.961, RSMo, as the Commission deems appropriate.

EXHIBITS

- **Exhibit A:** Missouri Ethics Commission filing, Nathan Willett for Missouri, M.E.C. ID A222398, Committee Disclosure Report/Termination Statement, filed 4/30/2026 (Cover Page, Report Summary, Form CD1, Form CD1B, Form CD3, Form CD3 Sup A, Form CD-8, Addendum Statements, Form CO-3).
- **Exhibit B:** Grassroots America Inc. IRS filings (EIN 88-2873007), reflecting Jason D. Boles as treasurer and principal officer.
- **Exhibit C:** Committee check number 1029 (Nathan Willett for the Missouri, drawn on Central Bank), dated April 2, 2026, in the amount of \$2,400.00, memo “Refund,” payee name redacted; Notice of Charge Back Items from Connections Bank, dated May 25, 2026, and legal copy of the returned check (bank processing date May 20, 2026), reflecting a \$2,400.00 return for insufficient funds on the committee’s Central Bank account, payee name redacted; and a personal check (Nathan Willett, drawn on Bank Midwest), dated May 18, 2026, in the amount of \$2,400.00, payee name redacted.

SUPPORTING AUTHORITY ATTACHED

- MEC Advisory Opinion No. 1995.12.159 (Dec. 6, 1995), confirming that Section 130.034, RSMo governs the disposition of funds by a Missouri committee where a candidate seeks to move funds toward a federal campaign, and that the Commission does not exercise jurisdiction over the propriety of the funds’ subsequent federal use.
- MEC Advisory Opinion No. 2018.01.CF.001 (Jan. 11, 2018), applying a substance-over-form approach to determine whether an entity not formally affiliated with a federal candidate under federal law should nonetheless be treated as functionally controlled by, and equivalent to, that candidate for purposes of Missouri’s campaign finance restrictions.



Missouri Ethics Commission
COMMITTEE DISCLOSURE REPORT COVER PAGE

M.E.C. ID NO. A222398

1. DATE OF REPORT 4/30/2026	OFFICE USE ONLY
------------------------------------	-----------------

INSTRUCTIONS ON REVERSE SIDE

2. FULL NAME OF COMMITTEE Nathan Willett for Missouri	
3. COMMITTEE MAILING ADDRESS Po Box 20625 156 Paris Street	4. COMMITTEE TELEPHONE NUMBER (309) 431-0719
CITY / STATE / ZIP Kansas City MO 64153	
5. TREASURER'S NAME James Hall M.D.	
6. TREASURER'S MAILING ADDRESS 10161 N Ambassador Dr.	7. TREASURER'S TELEPHONE NUMBER HOME: (816) 590-3201 WORK:
CITY / STATE / ZIP Kansas MO 64153	
8. DEPUTY TREASURER'S NAME ☐ CHECK IF NO DEPUTY TREASURER Nathan Willett	
9. DEPUTY TREASURER'S MAILING ADDRESS 8601 NW Old Stagecoach Road Kansas City MO 64154	10. DEPUTY TREASURER'S TELEPHONE NUMBER HOME: (816) 206-8841 WORK:
CITY / STATE / ZIP	
11. DATE OF ELECTION	12. TYPE OF ELECTION (CHECK ONE) ☐ PRIMARY ☐ GENERAL ☐ SPECIAL
13. TIME PERIOD COVERED BY THIS STATEMENT FROM 3/31/2026 THROUGH 4/30/2026	
14. CANDIDATE COMMITTEES ONLY: LIST CANDIDATE'S NAME, ADDRESS, PHONE, OFFICE SOUGHT, POLITICAL SUBDIVISION AND POLITICAL PARTY Nathan Willett Po Box 20625 156 Paris Street Kansas City MO 64153 (309) 431-0719 State Senator Missouri State Senate ☐ CHECK IF INCUMBENT ☒ REPUBLICAN ☐ DEMOCRAT ☐	15. TYPE OF REPORT ☐ 15 DAYS AFTER CAUCUS NOMINATION ☐ COMMITTEE QUARTERLY REPORT ☐ Jan 15 ☐ Apr 15 ☐ Jul 15 ☐ Oct 15 ☐ 8 DAYS BEFORE ☐ 30 DAYS AFTER ELECTION ☒ TERMINATION (ATTACH FORM CO-3) ☐ SEMIANNUAL DEBT REPORT ☐ Jan 15 ☐ Jul 15 ☐ ANNUAL SUPPLEMENTAL, JAN 15 ☐ 15 DAYS AFTER PETITION DEADLINE ☐ OTHER ☐ AMENDING PREVIOUS REPORT DATED _____, 20____
16. COMMITTEE TREASURER'S SIGNATURE I CERTIFY THAT THIS REPORT, COMPRISED OF THIS COVER PAGE AND ALL ATTACHED FORMS, IS COMPLETE, TRUE AND ACCURATE. ELECTRONICALLY FILED Apr 30 2026 10:13PM _____ TREASURER'S SIGNATURE	17. CANDIDATE'S SIGNATURE (CANDIDATE COMMITTEES ONLY) I CERTIFY THAT THIS REPORT, COMPRISED OF THIS COVER PAGE AND ALL ATTACHED FORMS, IS COMPLETE, TRUE AND ACCURATE. ELECTRONICALLY FILED Apr 30 2026 10:13PM _____ CANDIDATE'S SIGNATURE



Missouri Ethics Commission

REPORT SUMMARY

Instructions on Reverse Side

Name of Committee

Nathan Willett for
Missouri

Date of Report

4/30/2026

Office Use Only

Receipts	A. This Period	B. This Calendar Yr or Election Cycle	Statement of Beginning and Ending Financial Condition	
1. Total Receipts For This Election Previously Reported		\$ 225,290.60		
2. All Monetary Contributions Received This Period	\$ 2,926.11		Money On Hand	
3. All Loans Received This Period	+ 0.00			
4. Miscellaneous Receipts This Period	+ 0.00			
5. Subtotal Monetary Receipts This Period (Sum 2A + 3A + 4A)	\$ 2,926.11		24. Money On Hand at the beginning of this reporting period (Including funds in depository, cash, savings accounts and all other investments)	\$ 190,936.13
6. In-kind Contributions Received This Period	+ 0.00		25. Monetary Receipts this Period (From Item 5 - this page)	+ 2,926.11
7. Total All Receipts This Period (Sum 5A + 6A)	\$ 2,926.11		26. Monetary Disbursements Made This Period (Sum 10 + 16A + 23) a) Disbursements By Check \$ 193,862.24 b) Disbursements By Cash \$ 0.00	- 193,862.24
8. Total All Receipts This Election (Sum 1B + 7A)		\$ 228,216.71		
Expenditures	A. This Period	B. This Calendar Yr or Election Cycle		
9. Total Expenditures for this election previously reported		\$ 39,460.30	27. Money On Hand at the close of this reporting period (SUM 24 + 25 - 26)	\$ 0.00
10. Expenditures made by cash or check this period	\$ 6,277.78		Indebtedness	
11. In-Kind Ex. enditures made this . eriod	+ 0.00			
12. Expenditures incurred this period (not including loans) including payments made by credit card (line 17 CD3)	+ 0.00			
13. Total All expenditures made this period (Sum 10A + 11A + 12A) Including payments made by Credit Card (line 17 CD3)	\$ 6,277.78		28. Outstanding Indebtedness at the beginning of this period	\$ 3,000.00
14. Total Expenditures This Election (Sum 9B + 13A)		\$ 45,738.08	29. Loans Received This Period	+ 0.00
Contributions Made	A. This Period	B. This Calendar Yr or Election Cycle		
15. Total Contributions Made For This Election Previously Reported		\$ 3,975.00	30. A. New Expenditures Incurred This Period (include payments by Credit Card (Line 17 CD3)	+ 0.00
16. All Contributions Made This Period (25A or 25B of CD3)	A 165,384.46 B 0.00	← Cash/Check ← Credit Card	B. New Contributions Made by Credit Card (Line 25B CD3)	+ 0.00
17. All In-Kind Contributions Made This Period	+ 0.00		31. Payments Made on Loans This Period	- 3,000.00
18. Total Contributions Made This Period (Sum 16A + 17A)	\$ 165,384.46		32. Debt Forgiven on Loans This Period	- 0.00
19. Total All Contributions Made This Election (Sum 15B + 18A)		\$ 169,359.46	33. Payments Made This Period on Expenditures Incurred in Previous Period (Paid by Cash/Check Only) (Line 21 this page)	- 0.00
Other Disbursements	A. This Period	B. This Calendar Yr or Election Cycle		
20. Funds Used For Paying Loans This Period Including Credit Card Payments	+ 3,000.00		34. Total Indebtedness at the Close of This Reporting Period (Sum 28 + 29 + 30A + 30B - 31 - 32 - 33)	\$ 0.00
21. Payments This Period on Prev Reported Expend Incurred (Paid by Cash/Check Only)	+ 0.00			
22. Any Miscellaneous Disbursement Not Reported Elsewhere	+ 19,200.00			
23. Total Other Disbursements This Period (Sum 20A + 21A + 22A)	\$ 22,200.00			



MISSOURI ETHICS COMMISSION
CONTRIBUTIONS AND LOANS RECEIVED
INSTRUCTIONS ON REVERSE SIDE

OFFICE USE ONLY

1. NAME OF COMMITTEE Nathan Willett for Missouri		2. REPORT DATE 4/30/2026	
A. ITEMIZED CONTRIBUTIONS RECEIVED FROM COMMITTEES REGARDLESS OF THE AMOUNT, OR FROM PERSONS GIVING MORE THAN \$100 TO A COMMITTEE.		4. DATE RECEIVED ----- AGGREGATE TO DATE	5. AMOUNT RECEIVED (CHECK IF MONETARY OR IN-KIND)
3. NAME, ADDRESS AND OCCUPATION (LIST COMMITTEES FIRST) NAME: ADDRESS: Nathan Willett CITY / STATE: 8601 NW Old Stagecoach Rd EMPLOYER: Kansas City MO 64154 ☐ COMMITTEE: PHSD -- Teacher		4/30/2026 ----- \$ 2,926.11	\$ 2,926.11 ☒ MONETARY ☐ IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: ☐ COMMITTEE:		----- \$	\$ ☐ MONETARY ☐ IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: ☐ COMMITTEE:		----- \$	\$ ☐ MONETARY ☐ IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: ☐ COMMITTEE:		----- \$	\$ ☐ MONETARY ☐ IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: ☐ COMMITTEE:		----- \$	\$ ☐ MONETARY ☐ IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: ☐ COMMITTEE:		----- \$	\$ ☐ MONETARY ☐ IN-KIND
6. SUBTOTAL: ITEMIZED CONTRIBUTIONS THIS PAGE (SUM COLUMN 5)		\$ 2,926.11	
7. SUBTOTAL: ITEMIZED CONTRIBUTIONS ANY ATTACHED PAGES		+ \$ 0.00	
8. TOTAL: ITEMIZED CONTRIBUTIONS THIS PERIOD (SUM 6 + 7)		\$ 2,926.11	
9. AMOUNT OF ITEM 8 THAT WAS RECEIVED AS MONETARY CONTRIBUTIONS		\$ 2,926.11	
10. AMOUNT OF ITEM 8 THAT WAS RECEIVED AS IN-KIND CONTRIBUTIONS		\$ 0.00	
B. NON-ITEMIZED CONTRIBUTIONS RECEIVED (LIST BY CATEGORY, NOT BY INDIVIDUAL CONTRIBUTIONS)		AMOUNT RECEIVED	
11. TOTAL CONTRIBUTIONS RECEIVED AT FUND-RAISERS AS REPORTED INLINE 8 ON FORM CD1A		\$ 0.00	
12. TOTAL ANONYMOUS CONTRIBUTIONS RECEIVED FROM PERSON GIVING \$25 OR LESS		\$ 0.00	
13. TOTAL MONETARY CONTRIBUTIONS RECEIVED FROM PERSONS GIVING \$100 OR LESS		\$ 0.00	
14. TOTAL IN-KIND CONTRIBUTIONS RECEIVED FROM PERSONS (NOT COMMITTEES) GIVING \$100 OR LESS		\$ 0.00	
C. LOANS RECEIVED		16. DATE RECEIVED	
15. NAME AND ADDRESS OF LENDER		17. AMOUNT OF LOAN (IF MORE THAN \$100 ATTACH CD-1B)	
NAME: ADDRESS: CITY / STATE:		\$	
NAME: ADDRESS: CITY / STATE:		\$	
18. SUBTOTAL: LOANS THIS PAGE (SUM COLUMN 17)		\$ 0.00	
19. SUBTOTAL: LOANS FROM ANY ATTACHED PAGES		\$ 0.00	
20. TOTAL: LOANS THIS PERIOD (SUM 18 + 19)		\$ 0.00	
21. TOTAL: ALL IN-KIND CONTRIBUTIONS (SUM 10 + 14)		\$ 0.00	
22. TOTAL: ALL MONETARY CONTRIBUTIONS (SUM 9, 11, 12 & 13)		\$ 2,926.11	
23. MONETARY CONTRIBUTIONS & LOANS RECEIVED REQUIRING A RECORD OF NAME & ADDRESS (SUM 9, 13 & 20)		\$ 2,926.11	



MISSOURI ETHICS COMMISSION
SUPPLEMENTAL LOAN INFORMATION

INSTRUCTIONS ON REVERSE SIDE

CHECK TYPE OF FORM

☐ LOAN RECEIVED

☒ LOAN REPAYMENT

OFFICE USE ONLY

NAME OF COMMITTEE

Nathan Willett for Missouri

REPORT DATE

4/30/2026

I. LOAN RECEIVED (LOAN OF MORE THAN \$100)

1. NAME AND ADDRESS OF LENDER

2. NAME(S) AND ADDRESS(ES) OF PERSON(S) LIABLE FOR THE LOAN

3. LOAN I.D. NUMBER (IF ANY)

4. DATE OF LOAN

5. AMOUNT OF LOAN

\$

6. ANNUAL RATE OF INTEREST

%

7. TIME PERIOD OF LOAN (MONTH, YEARS, ETC.)

8. DESCRIBE REPAYMENT SCHEDULE (MONTHLY, SEMI-ANNUALLY, ETC.)

II. SCHEDULE OF REPAYMENT (PAYMENT MADE OR CREDIT RECEIVED)

1. DATE OF PAYMENT
OR CREDIT

2. NAME AND ADDRESS OF LENDER

3. AMOUNT OF PAYMENT
OR CREDIT

4/30/2026

Nathan Willett/8601 NW Old Stagecoach Road
Kansas City MO, 64154

3,000.00

4. TOTAL PAYMENT OR CREDIT ON LOANS THIS PERIOD (SUM ITEM 3)

\$ 3,000.00

5. AMOUNT OF ITEM 4 THAT WAS PAYMENT MADE

\$ 3,000.00

6. AMOUNT OF ITEM 4 THAT WAS CREDIT RECEIVED

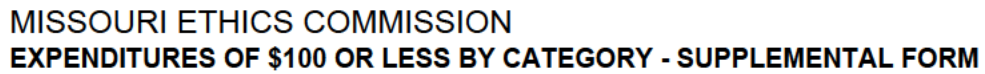
\$



MISSOURI ETHICS COMMISSION
EXPENDITURES AND CONTRIBUTIONS MADE
Instructions on Reverse Side

Office Use Only

1. Name of Committee Nathan Willett for Missouri		2. Report Date 4/30/2026	
A. Expenditures of \$100 or Less by Category (List Payments to Campaign Workers in Section B Below)		4. Amount Paid or Incurred This Period	
3. Category of Expenditure View Supplemental Form(s)			
5. Subtotal: Non-Itemized Expenditures This Page (Sum Column 4)		\$ 0.00	
6. Subtotal: Non-Itemized Expenditures Any Attached Pages		+ 31.78	
7. Total: Non-Itemized Expenditures This Period (Sum 5 + 6)		\$ 31.78	
B. Itemized Expenditures All Over \$100 And All Payments To Campaign Workers		10. Purpose - (If Payment was to a Campaign Worker, Show Aggregate Paid)	
8. Name and Address of Recipient	9. Date	11. Amount This Period	
Name: Ellinger Bell Address: 308 East High Street, Suite 300 City / State: Jefferson City MO 65101	4/23/2026	Legal Fees	\$ ☒ Paid 1,646.00 ☐ Incurred
Name: Nathan Willett Address: 8601 Stagecoach Rd City / State: 8601 Stagecoach Rd Kansas City MO 64154	4/29/2026	Gas	\$ ☒ Paid 4,600.00 ☐ Incurred
Name: Address: City / State:			\$ ☐ Paid ☐ Incurred
12. Subtotal: This Page (Sum Column 11)		\$ 6,246.00	
13. Subtotal: Any Attached Pages		+ 0.00	
14. Total: Itemized Expenditures This Period (Sum 12 + 13)		\$ 6,246.00	
15. Total: Monetary Expenditures This Period (Sum 7 + 14)		\$ 6,277.78	
16. Amount of Line 15 Above which was Paid Out This Period		\$ 6,277.78	
17. Amount of Line 15 Which Were Expenditures Incurred This Period Including Payments Made by Credit Cards		\$ 0.00	
18. If Committee Made Any In-Kind Expenditures This Period, List Amount		\$ 0.00	
19. Funds Used For Paying Loans/Credit Cards This Period (Attach Form CD1B - amount goes to Line 5 / Part II)		\$ 3,000.00	
C. Contributions Made (Regardless of Amount)		21. Date	
20. Name and Address of Candidate or Committee		22. Amount	
Name: Grassroots America Inc Address: 11770 Haynes Bridge Rd City / State: Alpharetta GA 30009	4/30/2026	\$ 165,384.46 ☒ Monetary ☐ In-Kind	
Name: Address: City / State:		\$ ☐ Monetary ☐ In-Kind	
Name: Address: City / State:		\$ ☐ Monetary ☐ In-Kind	
23. Subtotal: This Page (Sum Column 22)		\$ 165,384.46	
24. Subtotal: Any Attached Pages		\$ 0.00	
25. Total: Monetary Contributions Made This Period		A. By Cash / Check	\$ 165,384.46
		B. By Credit Card	\$ 0.00
26. If Committee Made Any Loans This Period, List Amount		\$	
27. Total: All Monetary Contributions and Loans Made This Period (Sum 25 + 26)		\$ 165,384.46	
28. Total: In-Kind Contributions Made This Period, List Amount		\$ 0.00	



NAME OF COMMITTEE
Nathan Willett for Missouri

EXPENDITURES OF \$100 OR LESS BY CATEGORY (LIST PAYMENTS TO CAMPAIGN WORKERS IN SECTION B ON FORM CD3 OR USE FORM CD3 SUP B)		AMOUNT PAID OR INCURRED THIS PERIOD
CATEGORY OF EXPENDITURE		
Bank Fees	\$	3.00
Quickbooks	\$	12.50
Amazon Fees	\$	16.28
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
TOTAL: ITEMIZED EXPENDITURES THIS PAGE		
(CARRY TO ITEM 13. "SUBTOTAL: ANY ATTACHED PAGES" ON FORM CD-3)	\$	--



MISSOURI ETHICS COMMISSION
INDEPENDENT CONTRACTOR EXPENDITURE

INSTRUCTIONS ON REVERSE SIDE

OFFICE USE ONLY

NAME OF COMMITTEE Nathan Willett for Missouri			DATE 4/30/2026	
ITEMIZED EXPENDITURES ON PAYMENT TO INDEPENDENT CONTRACTOR (NAME AND ADDRESS OF RECIPIENT)	DATE	DESCRIPTION OF SERVICES RENDERED	PRO-RATED COST FOR SERVICE	TOTAL AMOUNT PAID
Christian Hartgrove 8819 NE 74th TER 64158 Kansas City MO 64158	4/24/2026	Research	5,000.00	5,000.00
Tony Longsdale 1320 Huntington Dr Liberty MO 64068	4/28/2026	Research	4,000.00	4,000.00
TOTAL ALL PAGES ➡				9,000.00



Missouri Ethics Commission
ADDENDUM STATEMENT

M.E.C. ID NO. A222398

INSTRUCTIONS ON REVERSE SIDE

PURPOSE: Form Addendum should be used for explanation of any additional information needed to complete an accurate filing of this report.

Miscellaneous Disbursement:

Returned Donation-Eric Bruder

Amount: 2400.00

Miscellaneous Disbursement:

Returned Donation-Stephanie Lager

Amount: 2400.00

Miscellaneous Disbursement:

Returned Donation-Scott Norman

Amount: 2400.00



Missouri Ethics Commission
ADDENDUM STATEMENT

M.E.C. ID NO. A222398

INSTRUCTIONS ON REVERSE SIDE

PURPOSE: Form Addendum should be used for explanation of any additional information needed to complete an accurate filing of this report.

Miscellaneous Disbursement:

Returned Donation-George Williams

Amount: 2400.00

Miscellaneous Disbursement:

Returned Donation-Kyle Philips

Amount: 2400.00

Miscellaneous Disbursement:

Returned Donation-Brad Lager

Amount: 2400.00



Missouri Ethics Commission
ADDENDUM STATEMENT

M.E.C. ID NO. A222398

INSTRUCTIONS ON REVERSE SIDE

PURPOSE: Form Addendum should be used for explanation of any additional information needed to complete an accurate filing of this report.

Miscellaneous Disbursement:

Returned Donation-Ben Christian

Amount: 2400.00

Miscellaneous Disbursement:

Returned Donation-Ron Schieber

Amount: 2400.00



Missouri Ethics Commission
COMMITTEE TERMINATION STATEMENT

OFFICE USE ONLY

INSTRUCTIONS ON REVERSE SIDE

M.E.C. ID NO. A222398

1. FULL NAME OF COMMITTEE Nathan Willett for Missouri		2. DATE OF REPORT 4/30/2026	3. DATE OF DISSOLUTION 4/30/2026
4. TREASURER'S NAME AND ADDRESS NAME: James Hall M.D. ADDRESS: 10161 N Ambassador Dr. CITY / STATE / ZIP: Kansas MO 64153		5. NAME, ADDRESS AND PHONE OF PERSON RESPONSIBLE FOR MAINTAINING RECORDS NAME: James Hall ADDRESS: 10161 N Ambassador Dr. CITY / STATE / ZIP: Kansas City MO 64153 TELEPHONE NO: 816-590-3201	
6. DISTRIBUTION OF SURPLUS FUNDS ☒ CHECK IF NO SURPLUS REMAINED UPON TERMINATION			
A. NAME AND ADDRESS OF RECIPIENT		B. DATE OF TRANSFER	C. AMOUNT
NAME: ADDRESS: CITY / STATE / ZIP:			\$
NAME: ADDRESS: CITY / STATE / ZIP:			\$
NAME: ADDRESS: CITY / STATE / ZIP:			\$
NAME: ADDRESS: CITY / STATE / ZIP:			\$
NAME: ADDRESS: CITY / STATE / ZIP:			\$
NAME: ADDRESS: CITY / STATE / ZIP:			\$
7. DISPOSAL OF OUTSTANDING DEBTS ☒ CHECK IF COMMITTEE HAD NO DEBTS UPON TERMINATION			
A. NAME OF CREDITOR		B. DESCRIBE DISPOSAL OF DEBT	C. AMOUNT
NAME: ADDRESS: CITY / STATE / ZIP:			\$
NAME: ADDRESS: CITY / STATE / ZIP:			\$
NAME: ADDRESS: CITY / STATE / ZIP:			\$
NAME: ADDRESS: CITY / STATE / ZIP:			\$
NAME: ADDRESS: CITY / STATE / ZIP:			\$
NAME: ADDRESS: CITY / STATE / ZIP:			\$
8. TREASURER VERIFICATION OF DISSOLUTION: I CERTIFY THAT THE ABOVE NAMED COMMITTEE WAS DISSOLVED ON THE DATE INDICATED, AND THAT ALL REQUIREMENTS FOR TERMINATION UNDER SECTIONS 130.021.8 AND 130.046.7 RSMo HAVE BEEN MET. ELECTRONICALLY SIGNED _____ TREASURER'S SIGNATURE		9. CANDIDATE VERIFICATION OF DISSOLUTION: (CANDIDATE COMMITTEE ONLY) I CERTIFY THAT THE ABOVE NAMED COMMITTEE WAS DISSOLVED ON THE DATE INDICATED, AND THAT ALL REQUIREMENTS FOR TERMINATION UNDER SECTIONS 130.021.8 AND 130.046.7 RSMo HAVE BEEN MET. ELECTRONICALLY SIGNED _____ CANDIDATE'S SIGNATURE	

GRASSROOTS AMERICA INC

EIN: 88-2873007 | Alpharetta, Georgia, United States

Form 990-N (e-Postcard)

Organizations who have filed a 990-N (e-Postcard) annual electronic notice.
Most small organizations that receive less than \$50,000 fall into this category.

Tax Year 2024 Form 990-N (e-Postcard)

Tax Period:

2024 (01/01/2024-12/31/2024)

EIN:

88-2873007

Organization Name (Doing Business as):

GRASSROOTS AMERICA INC

Mailing Address:

126 C STREET NW THIRD FLOOR
Washington, DC 20001
United States

Principal Officer's Name and Address:

JASON D BOLES
11770 HAYNES BRIDGE RD STE 205 267
ALPHARETTA, GA 30009
United States

Gross receipts not greater than:

\$50,000

Organization has terminated:

No

Website URL:

Tax Year 2023 Form 990-N (e-Postcard)

Tax Period:

2023 (01/01/2023-12/31/2023)

EIN:

88-2873007

Organization Name (Doing Business as):

GRASSROOTS AMERICA INC

Mailing Address:

11770 Haynes Bridge Rd Ste 205 267
ALPHARETTA, GA 30009
United States

Principal Officer's Name and Address:

JASON D BOLES

11770 HAYNES BRIDGE ROAD
STE 205 267
ALPHARETTA, GA 30009
United States

Gross receipts not greater than:

\$50,000

Organization has terminated:

No

Website URL:

Copies of Returns (990, 990-EZ, 990-PF, 990-T)

Electronic copies (images) of Forms 990, 990-EZ, 990-PF or 990-T returns filed with the IRS by charities and non-profits.

Organization Name:

GRASSROOTS AMERICA INC

EIN:

88-2873007

Tax Period:

202212

Return ID:

4678749

Filing Type:

E

Return Type:

990EO

Copy of Return:

[2022 Form 990EO Filing](#)

[\[/pub/epostcard/cor/882873007_202212_990EO_20240111222\]](#)

efile GRAPHIC print - DO NOT PROCESS As Filed Data - DLN: 93492320016003

Form 990EZ

Department of the Treasury Internal Revenue Service

Short Form

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

Do not enter social security numbers on this form as it may be made public.

Go to www.irs.gov/Form990EZ for instructions and the latest information.

OMB No. 1545-0047

2022

Open to Public Inspection

A For the 2022 calendar year, or tax year beginning 06-20-2022, and ending 12-31-2022

B Check if applicable:
☐ Address change
☐ Name change
☐ Initial return
☐ Final return/terminated
☐ Amended return
☐ Application pending

C Name of organization
GRASSROOTS AMERICA INC
% JASON D BOLES
Number and street (or P. O. box, if mail is not delivered to street address) Room/suite
PO BOX 1483
City or town, state or province, country, and ZIP or foreign postal code
ROSWELL, GA 30077

D Employer identification number
88-2873007

E Telephone number

F Group Exemption Number

G Accounting Method: ☒ Cash ☐ Accrual Other (specify)

H Check ☒ if the organization is not required to attach Schedule B (Form 990, 990-EZ, or 990-PF).

I Website:

J Tax-exempt status (check only one) ☐ 501(c)(3) ☒ 501(c)(4) (insert no.) ☐ 4947(a)(1) or ☐ 527

K Form of organization: ☒ Corporation ☐ Trust ☐ Association ☐ Other

L Add lines 5b, 6c, and 7b to line 9 to determine gross receipts. If gross receipts are \$200,000 or more, or if total assets (Part II, column (B) below) are \$500,000 or more, file Form 990 instead of Form 990-EZ \$ 9,784

Part I

Revenue, Expenses, and Changes in Net Assets or Fund Balances (see the instructions for Part I)

Check if the organization used Schedule O to respond to any question in this Part I

Revenue

1 Contributions, gifts, grants, and similar amounts received 9,783

2 Program service revenue including government fees and contracts

3 Membership dues and assessments

4 Investment income 1

5a Gross amount from sale of assets other than inventory 5a

5b Less: cost or other basis and sales expenses 5b

5c Gain or (loss) from sale of assets other than inventory (Subtract line 5b from line 5a)

6 Gaming and fundraising events

6a Gross income from gaming (attach Schedule G if greater than \$15,000) 6a

6b Gross income from fundraising events (not including \$ of contributions from fundraising events reported on line 1) (attach Schedule G if the sum of such gross income and contributions exceeds \$15,000) 6b

6c Less: direct expenses from gaming and fundraising events 6c

6d Net income or (loss) from gaming and fundraising events (add lines 6a and 6b and subtract line 6c)

7a Gross sales of inventory, less returns and allowances 7a 0

7b Less: cost of goods sold 7b 0

7c Gross profit or (loss) from sales of inventory (Subtract line 7b from line 7a) 7c 0

8 Other revenue (describe in Schedule O) 8

9 Total revenue. Add lines 1, 2, 3, 4, 5c, 6d, 7c, and 8 9,784

Expenses

10 Grants and similar amounts paid (list in Schedule O) 10 839

11 Benefits paid to or for members 11

12 Salaries, other compensation, and employee benefits 12

13 Professional fees and other payments to independent contractors 13

14 Occupancy, rent, utilities, and maintenance 14

15 Printing, publications, postage, and shipping 15

16 Other expenses (describe in Schedule O) 16 8,155

17 Total expenses. Add lines 10 through 16 17 8,994

Net Assets

18 Excess or (deficit) for the year (Subtract line 17 from line 9) 18 790

19 Net assets or fund balances at beginning of year (from line 27, column (A)) (must agree with end-of-year figure reported on prior year's return) 19 0

20 Other changes in net assets or fund balances (explain in Schedule O) 20 0

21 Net assets or fund balances at end of year. Combine lines 18 through 20 21 790

For Paperwork Reduction Act Notice, see the separate instructions.

Cat. No. 106421

Form 990-EZ (2022)

Check if the organization used Schedule O to respond to any question in this Part II ☐

Check if the organization used Schedule O to respond to any question in this Part IV. ☐

Part V Other Information (Note the Schedule A and personal benefit contract statement requirements in the instructions for Part V.) Check if the organization used Schedule O to respond to any question in this Part V. ☐

	Yes	No
33 Did the organization engage in any significant activity not previously reported to the IRS? If "Yes," provide a detailed description of each activity in Schedule O	33	No
34 Were any significant changes made to the organizing or governing documents? If "Yes," attach a conformed copy of the amended documents if they reflect a change to the organization's name. Otherwise, explain the change on Schedule O. See instructions.	34	No
35a Did the organization have unrelated business gross income of \$1,000 or more during the year from business activities (such as those reported on lines 2, 6a, and 7a, among others)?	35a	No
b If "Yes," to line 35a, has the organization filed a Form 990-T for the year? If "No," provide an explanation in Schedule O	35b	
c Was the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization subject to section 6033(e) notice, reporting, and proxy tax requirements during the year? If "Yes," complete Schedule C, Part III	35c	No
36 Did the organization undergo a liquidation, dissolution, termination, or significant disposition of net assets during the year? If "Yes," complete applicable parts of Schedule N	36	No
37a Enter amount of political expenditures, direct or indirect, as described in the instructions. ▶ 37a 3,700		
b Did the organization file Form 1120-POL for this year?	37b	No
38a Did the organization borrow from, or make any loans to, any officer, director, trustee, or key employee or were any such loans made in a prior year and still outstanding at the end of the tax year covered by this return?	38a	No
b If "Yes," complete Schedule L, Part II and enter the total amount involved	38b	
39 Section 501(c)(7) organizations. Enter:		
a Initiation fees and capital contributions included on line 9	39a	
b Gross receipts, included on line 9, for public use of club facilities	39b	
40a Section 501(c)(3) organizations. Enter amount of tax imposed on the organization during the year under: section 4911 ▶ ; section 4912 ▶ ; section 4955 ▶		
b Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in any section 4958 excess benefit transaction during the year, or did it engage in an excess benefit transaction in a prior year that has not been reported on any of its prior Forms 990 or 990-EZ? If "Yes," complete Schedule L, Part I	40b	No
c Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Enter amount of tax imposed on organization managers or disqualified persons during the year under sections 4912, 4955, and 4958 ▶		
d Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Enter amount of tax on line 40c reimbursed by the organization ▶		
e All organizations. At any time during the tax year, was the organization a party to a prohibited tax shelter transaction? If "Yes," complete Form 8886-T	40e	No
41 List the states with which a copy of this return is filed. ▶ GA		
42a The organization's books are in care of ▶ RTA STRATEGY LLC Telephone no. ▶ (404) 474-7226		

Located at ▶ PO BOX 1483 ROSWELL, GA ZIP + 4 ▶ 30077

	Yes	No
b At any time during the calendar year, did the organization have an interest in or a signature or other authority over a financial account in a foreign country (such as a bank account, securities account, or other financial account)?	42b	No
If "Yes," enter the name of the foreign country: ▶		
See the instructions for exceptions and filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR).		
c At any time during the calendar year, did the organization maintain an office outside the U.S.?	42c	No
If "Yes," enter the name of the foreign country: ▶		
43 Section 4947(a)(1) nonexempt charitable trusts filing Form 990-EZ in lieu of Form 1041 - Check here ▶ ☐ and enter the amount of tax-exempt interest received or accrued during the tax year ▶ 43		

	Yes	No
44a Did the organization maintain any donor advised funds during the year? If "Yes," Form 990 must be completed instead of Form 990-EZ	44a	No
b Did the organization operate one or more hospital facilities during the year? If "Yes," Form 990 must be completed instead of Form 990-EZ	44b	No
c Did the organization receive any payments for indoor tanning services during the year?	44c	No
d If "Yes," to line 44c, has the organization filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O	44d	
45a Did the organization have a controlled entity within the meaning of section 512(b)(13)?	45a	No
45b Did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? If "Yes," Form 990 and Schedule R may need to be completed instead of Form 990-EZ (see instructions)	45b	No

		Yes	No
46	Did the organization engage, directly or indirectly, in political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I.	46	Yes

Part VI

Section 501(c)(3) Organizations Only

All section 501(c)(3) organizations must answer questions 47- 49b and 52, and complete the tables for lines 50 and 51. Check if the organization used Schedule O to respond to any question in this Part VI ☐

		Yes	No
47	Did the organization engage in lobbying activities or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II	47	
48	Is the organization a school as described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	48	
49a	Did the organization make any transfers to an exempt non-charitable related organization?	49a	
49b	If "Yes," was the related organization a section 527 organization?	49b	

50 Complete this table for the organization's five highest compensated employees (other than officers, directors, trustees and key employees) who each received more than \$100,000 of compensation from the organization. If there is none, enter "None."				
(a) Name and title of each employee	(b) Average hours per week devoted to position	(c) Reportable compensation (Forms W-2/1099-MISC)	(d) Health benefits, contributions to employee benefit plans, and deferred compensation	(e) Estimated amount of other compensation

f	Total number of other employees paid over \$100,000	▶	
---	---	---	--

51 Complete this table for the organization's five highest compensated independent contractors who each received more than \$100,000 of compensation from the organization. If there is none, enter "None."		
(a) Name and business address of each independent contractor	(b) Type of service	(c) Compensation

d	Total number of other independent contractors each receiving over \$100,000.	▶	
---	--	---	--

52	Did the organization complete Schedule A? NOTE. All section 501(c)(3) organizations must attach a completed Schedule A	▶	☐ Yes ☐ No
----	---	---	--

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here	***** Signature of officer		2023-11-16 Date		
	JASON D BOLES TREASURER Type or print name and title				
Paid Preparer Use Only	Print/Type preparer's name Kenlee Foskey	Preparer's signature	Date 2023-11-16	Check ☐ if self-employed	PTIN P03134614
	Firm's name ▶ RTA Strategy			Firm's EIN ▶ 27-1049657	
	Firm's address ▶ 1060 Powers Place Alpharetta, GA 30009			Phone no.	

	May the IRS discuss this return with the preparer shown above? See instructions	▶	☒ Yes ☐ No
--	---	---	---

Additional Data

Software ID: 22016104
Software Version: V1.0
EIN: 88-2873007
Name: GRASSROOTS AMERICA INC

Form 990EZ, Part III - Statement of Program Service Accomplishments

Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. In a clear and concise manner, describe the services provided, the number of persons benefited, and other relevant information for each program title.		Expenses (Required for section 501(c)(3) and 501(c)(4) organizations; optional for others.)	
28 To encourage a grassroots movement and advocacy across America. (Grants \$ 839) If this amount includes foreign grants, check here . . . ☐		28a	0

If the organization answered "Yes" on Form 990, Part IV, Line 3, or Form 990-EZ, Part V, line 46 (Political Campaign Activities), then

- Section 501(c)(3) organizations: Complete Parts I-A and B. Do not complete Part I-C.
- Section 501(c) (other than section 501(c)(3)) organizations: Complete Parts I-A and C below. Do not complete Part I-B.
- Section 527 organizations: Complete Part I-A only.

If the organization answered "Yes" on Form 990, Part IV, Line 4, or Form 990-EZ, Part VI, line 47 (Lobbying Activities), then

- Section 501(c)(3) organizations that have filed Form 5768 (election under section 501(h)): Complete Part II-A. Do not complete Part II-B.
- Section 501(c)(3) organizations that have NOT filed Form 5768 (election under section 501(h)): Complete Part II-B. Do not complete Part II-A.

If the organization answered "Yes" on Form 990, Part IV, Line 5 (Proxy Tax) (see separate instructions) or Form 990-EZ, Part V, line 35c (Proxy Tax) (see separate instructions), then

- Section 501(c)(4), (5), or (6) organizations: Complete Part III.

Name of the organization GRASSROOTS AMERICA INC	Employer identification number 88-2873007
--	--

Part I-A Complete if the organization is exempt under section 501(c) or is a section 527 organization.

1	Provide a description of the organization's direct and indirect political campaign activities in Part IV. See instructions for definition of "political campaign activities."	
2	Political campaign activity expenditures. See instructions	\$ 3,700
3	Volunteer hours for political campaign activities. See instructions	

Part I-B Complete if the organization is exempt under section 501(c)(3).

1	Enter the amount of any excise tax incurred by the organization under section 4955	\$	
2	Enter the amount of any excise tax incurred by organization managers under section 4955	\$	
3	If the organization incurred a section 4955 tax, did it file Form 4720 for this year?	☐ Yes	☐ No
4a	Was a correction made?	☐ Yes	☐ No
b	If "Yes," describe in Part IV.		

Part I-C Complete if the organization is exempt under section 501(c), except section 501(c)(3).

1	Enter the amount directly expended by the filing organization for section 527 exempt function activities	\$	
2	Enter the amount of the filing organization's funds contributed to other organizations for section 527 exempt function activities	\$	3,700
3	Total exempt function expenditures. Add lines 1 and 2. Enter here and on Form 1120-POL, line 17b.....	\$	3,700
4	Did the filing organization file Form 1120-POL for this year?	☐ Yes	☒ No
5	Enter the names, addresses and employer identification number (EIN) of all section 527 political organizations to which the filing organization made payments. For each organization listed, enter the amount paid from the filing organization's funds. Also enter the amount of political contributions received that were promptly and directly delivered to a separate political organization, such as a separate segregated fund or a political action committee (PAC). If additional space is needed, provide information in Part IV.		

(a) Name	(b) Address	(c) EIN	(d) Amount paid from filing organization's funds. If none, enter -0-.	(e) Amount of political contributions received and promptly and directly delivered to a separate political organization. If none, enter -0-.
(1) COMMITTEE TO ELECT ANGELA RIGAS	PO Box 365 CALEDONIA, MI 49316	46-5414662	3,000	0
2				
3				
4				
5				
6				

Part II-A Complete if the organization is exempt under section 501(c)(3) and filed Form 5768 (election under section 501(h)).

A Check ☐ if the filing organization belongs to an affiliated group (and list in Part IV each affiliated group member's name, address, EIN, expenses, and share of excess lobbying expenditures).

B Check ☐ if the filing organization checked box A and "limited control" provisions apply.

Limits on Lobbying Expenditures (The term "expenditures" means amounts paid or incurred.)	(a) Filing organization's totals	(b) Affiliated group totals
1a Total lobbying expenditures to influence public opinion (grass roots lobbying)		
b Total lobbying expenditures to influence a legislative body (direct lobbying)		
c Total lobbying expenditures (add lines 1a and 1b)		
d Other exempt purpose expenditures		
e Total exempt purpose expenditures (add lines 1c and 1d)		
f Lobbying nontaxable amount. Enter the amount from the following table in both columns.		
If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:	
Not over \$500,000	20% of the amount on line 1e.	
Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000.	
Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000.	
Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000.	
Over \$17,000,000	\$1,000,000.	
g Grassroots nontaxable amount (enter 25% of line 1f)		
h Subtract line 1g from line 1a. If zero or less, enter -0-		
i Subtract line 1f from line 1c. If zero or less, enter -0-		
j If there is an amount other than zero on either line 1h or line 1i, did the organization file Form 4720 reporting section 4911 tax for this year?	☐ Yes ☐ No	

4-Year Averaging Period Under Section 501(h)
(Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the separate instructions for lines 2a through 2f.)

Lobbying Expenditures During 4-Year Averaging Period					
Calendar year (or fiscal year beginning in)	(a) 2019	(b) 2020	(c) 2021	(d) 2022	(e) Total
2a Lobbying nontaxable amount					
b Lobbying ceiling amount (150% of line 2a, column(e))					
c Total lobbying expenditures					
d Grassroots nontaxable amount					
e Grassroots ceiling amount (150% of line 2d, column (e))					
f Grassroots lobbying expenditures					

Part II-B Complete if the organization is exempt under section 501(c)(3) and has NOT filed Form 5768 (election under section 501(h)).

For each "Yes" response on lines 1a through 1i below, provide in Part IV a detailed description of the lobbying activity.

		(a)		(b)
		Yes	No	Amount
1	During the year, did the filing organization attempt to influence foreign, national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of:			
a	Volunteers?			
b	Paid staff or management (include compensation in expenses reported on lines 1c through 1i)?			
c	Media advertisements?			
d	Mailings to members, legislators, or the public?			
e	Publications, or published or broadcast statements?			
f	Grants to other organizations for lobbying purposes?			
g	Direct contact with legislators, their staffs, government officials, or a legislative body?			
h	Rallies, demonstrations, seminars, conventions, speeches, lectures, or any similar means?			
i	Other activities?			
j	Total. Add lines 1c through 1i			
2a	Did the activities in line 1 cause the organization to be not described in section 501(c)(3)?			
b	If "Yes," enter the amount of any tax incurred under section 4912			
c	If "Yes," enter the amount of any tax incurred by organization managers under section 4912			
d	If the filing organization incurred a section 4912 tax, did it file Form 4720 for this year?			

Part III-A Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6).

	Yes	No
1 Were substantially all (90% or more) dues received nondeductible by members?	1	
2 Did the organization make only in-house lobbying expenditures of \$2,000 or less?	2	
3 Did the organization agree to carry over lobbying and political expenditures from the prior year?	3	

Part III-B Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Part III-A, line 3, is answered "Yes."

1	Dues, assessments and similar amounts from members	1	
2	Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid).		
a	Current year	2a	
b	Carryover from last year	2b	
c	Total	2c	
3	Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues .	3	
4	If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess does the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year?	4	
5	Taxable amount of lobbying and political expenditures. See Instructions	5	

Part IV Supplemental Information

Provide the descriptions required for Part I-A, line 1; Part I-B, line 4; Part I-C, line 5; Part II-A (affiliated group list); Part II-A, lines 1 and 2 (see instructions), and Part II-B, line 1. Also, complete this part for any additional information.

Return Reference	Explanation
Part I-A, line 1	CONTRIBUTION TO CANDIDATE AND LOCAL PARTY

SCHEDULE O (Form 990) Department of the Treasury Internal Revenue Service	Supplemental Information to Form 990 or 990-EZ Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information. ▶ Attach to Form 990 or 990-EZ. ▶ Go to <u>www.irs.gov/Form990</u> for the latest information.	OMB No. 1545-0047 2022 Open to Public Inspection
--	---	--

Name of the organization GRASSROOTS AMERICA INC	Employer identification number 88-2873007
--	--

990 Schedule O, Supplemental Information

Return Reference	Explanation
Part I, line 10	Activity:, Grantee Name:, Grantee Address:, Amount:, Relationship: GET OUT THE VOTE ADV OCACY, TURNING POINT USA MICHIGAN STATE, "220 Trowbridge Rd East Lansing MI 48824 USA", \$8 39.00, None

990 Schedule O, Supplemental Information

Return Reference	Explanation
Part I, line 16	Other Expenses:, Amount: EVENT CATERING AND VENUE RENTAL, \$4076.00 CONTRIBUTION TO 527 , \$3700.00 BANK FEES, \$31.00 ACCOUNTING SERVICES, \$112.00 SOFTWARE FEES, \$236.00



Connections Bank

P.O. BOX 380
PLATTE CITY, MISSOURI 64079

ADDRESS
CORRECTION
REQUESTED



quodient
FIRST-CLASS MAIL
1M1
\$000.74²
05/26/2026 ZIP 64079
043M31244555

US POSTAGE

REC'D MAY 29 2026

NOTICE OF CHARGE BACK ITEMS

DATE: 5/25/26

AMOUNT	ACTION	CHARGE	PAYOR NAME/REASON FOR RETURN
2,400.00	CHRGD BACK	5.00	NOT SUFFICIENT FUNDS

ACCOUNT NUMBER:	[REDACTED]
CHARGE BACKS:	2,400.00
CHARGES:	5.00

[REDACTED]
Connections Bank
1100 Branch St
PO BOX 380
PLATTE CITY MO 64079-0380

NSF

[REDACTED]
This is a LEGAL COPY of your
check. You can use it the same
way you would use the original
check.

RETURN REASON-A
NOT SUFFICIENT
FUNDS

Re Nathan Willett
Refund check
was no good

[REDACTED]
This is a LEGAL COPY of your
check. You can use it the same
way you would use the original
check.
RETURN REASON-A
NOT SUFFICIENT
FUNDS

NSF

NATHAN WILLETT FOR THE MISSOURI		1024
P.O. BOX 20628		05/26/26
KANSAAS CITY, MO 64116		
CASH	4/2/26	
[REDACTED]		\$ 2,400
Two Thousand Four Hundred No/100		
Central Bank	1518	
Refund	Nathan Willett	
1: 10 120 189 21: 1: 130 28 74 9 21: 10 24		
4: 10 120 189 21: 130 28 74 9 21: 10 24 00000 2400000		

NATHAN WILLETT FOR THE MISSOURI

P.O. BOX 20625

KANSAS CITY, MO 64195

1029

80-189/1012

4/2/26

DATE

CHECK ARMOR
FRAUD PROTECTION

PAY TO THE
ORDER OF

\$

2,400

Two Thousand Four Hundred

DOLLARS



Photo
Safe
Deposit®
Details on back



Central Bank

www.centralbank.net

MEMBER
FDIC

FOR

Refund

Nathan Willett

MP

⑆ 101201892⑆ ⑈ 130287492⑈

1029



STATE OF MISSOURI
MISSOURI ETHICS COMMISSION
P.O. BOX 1254
JEFFERSON CITY, MISSOURI 65102

OPINION NO.

1995.12.159

314/751-2020
1-800/392-8660

COPY

December 6, 1995

At the December 5, 1995 meeting of the Missouri Ethics Commission your letters of October 31 and November 14, 1995 were discussed. The following is in response to your question: *Can I transfer funds from a committee created to run for president pro tem of the senate to a federal election campaign committee?*

The Commission stated the balance of any funds in a committee organized to support your candidacy for president pro tem of the Senate must be disposed of in accordance with section 130.034, RSMo. The Commission does not have jurisdiction over limitations on federal campaigns; therefore, the Commission cannot answer questions concerning limitations and gifts in federal campaigns.

If you have any further questions, please do not hesitate to contact this office.

Sincerely,

Marion N. Sinnett
Administrative Secretary

MNS:bd

NOTICE

Anyone examining this advisory opinion should be careful to note that an opinion of the Missouri Ethics Commission deals only with the specific request to which the opinion responded and only as to the law as it existed at the date of the response and cannot be relied upon for any other purpose or in any other manner.



MISSOURI ETHICS COMMISSION
P.O. Box 1254
Jefferson City, MO 65102
www.mec.mo.gov
(573) 751-2020 / (800) 392-8660

James Klahr
Executive Director

January 11, 2018

Re: Advisory Opinion No. 2018.01.CF.001

At the January 11, 2018 meeting of the Missouri Ethics Commission, your request for an opinion was discussed.

Opinion

Pursuant to §105.955.16, RSMo, the Missouri Ethics Commission may issue a written opinion regarding any issue on which the Commission can receive a complaint pursuant to §105.957, RSMo. The Commission receives complaints alleging violation of campaign finance provisions of Missouri law. This opinion is issued within the context of Missouri's laws governing such issues, and assumes the facts presented by you in your letter.

The question presented is:

Article VIII, Section 23.3(4) states that no candidate's candidate committee shall accept contributions from, or make contributions to, another candidate committee, including any candidate committee, or equivalent entity, established under federal law. Can a federal leadership PAC established by a Missouri federal officeholder make contributions to candidates in Missouri?

Supporting Analysis

Article VIII, Section 23.3(4) states as follows:

(4) No candidate's candidate committee shall accept contributions from, or make contributions to, another candidate committee, including any candidate committee, or equivalent entity, established under federal law.

Federal Election Commission (FEC) regulation 11 C.F.R. § 100.5(e) provides examples of federal political committees as follows:

(1) Principal campaign committee. Principal campaign committee means a political committee designated and authorized by a candidate pursuant to 11 CFR 101.1 and 102.1.

(2) Single candidate committee. Single candidate committee means a political committee other than a principal campaign committee which makes or receives contributions or makes expenditures on behalf of only one candidate.

(3) Multi-candidate committee. Multi-candidate committee means a political committee which (i) has been registered with the Commission or Secretary of the Senate for at least 6 months; (ii) has received contributions for Federal elections from more than 50 persons; and (iii) (except for any State political party organization) has made contributions to 5 or more Federal candidates.

...

(6) Leadership PAC. Leadership PAC means a political committee that is directly or indirectly established, financed, maintained or controlled by a candidate for Federal office or an individual holding Federal office but which is not an authorized committee of the candidate or individual and which is not affiliated with an authorized committee of the candidate or individual, except that leadership PAC does not include a political committee of a political party.¹

The question before this Commission is whether a committee authorized by federal law, while not a federal candidate's authorized candidate committee, is considered an "equivalent entity" for purposes of the Missouri Constitutional provision which prohibits contributions made or received by state candidate committees from federal candidate committees, or equivalent entities.

According to the Federal Election Commission Final Rules on Leadership PACs, 68 Fed. Reg. 67,017 (Dec. 1, 2003), federal officeholders and/or federal candidates may form "leadership PACs" to support candidates for various federal or nonfederal offices. Under federal law, these committees are not legally "affiliated" with the federal candidate's principal campaign and operate as federal nonconnected committees with certain rules applying regarding contributions and expenditures and contribution limits. For example, when a leadership PAC "pay[s] for costs that could or should be paid for by a candidate's authorized committee, such payments are in-kind contributions, subject to the Act's contribution limits and reporting requirements. *Id.*

Unlike a Missouri continuing committee or political action committee which by definition is not "formed, controlled or directed by a candidate,"² a federal leadership PAC is "established, financed, maintained or controlled" by a federal candidate or officeholder. Thus while not legally affiliated with the federal principal committee under federal law, these committees hold a unique position, unlike Missouri law, in which a federal candidate can establish and control the PAC.

According to §11 CFR 300.62, the leadership PAC "may solicit, receive, direct, transfer, spend, or disburse funds in connection with any non-Federal election, only in amounts and from sources

¹ Statutory authority for federal committees can be found in 52 U.S.C. §30101.

² Mo. Const. art. VIII, § 23.7(6)(c) and § 23.7(20); §130.011(10), RSMo.

that are consistent with State law, and that do not exceed the Act's contribution limits or come from prohibited sources under the Act.”

While Art. VIII, Section 23.3(4) does not define “equivalent entity,” it is this Commission’s opinion that a federal leadership PAC operates as an equivalent entity for a federal candidate committee for purposes of Missouri’s prohibition on contributions made or received between candidate committees. It should be noted that the prohibition applies to contributions only of state candidate committees, and not to independent expenditures made by a federal leadership PAC to support or oppose a Missouri state candidate or contributions made to or by other federal committees which do not fall within the prohibition.

Sincerely,



James Klahr
Executive Director