

BEFORE THE MISSOURI ETHICS COMMISSION

**CAMPAIGN FINANCE
COMPLAINT**

Date of Complaint:

Name of Complainant:

Address of Complainant:

Phone Number of Complainant:

Committees and Individuals Against
Whom Complaint is Brought:

Believe in Life and Liberty –
BILL PAC and its Treasurer
Debbie McFarland
P. O. Box 84
St. Charles, MO 63302

Office Sought:

Supporting Bill Eigel for Governor

Nature of Complaint:

Campaign Finance Disclosure
Requirements In Chapter 130, Revised
Statutes of Missouri And Article VIII,
Section 23 of The Missouri Constitution

The matters alleged in this Complaint are not the subject of civil or criminal litigation, to the knowledge of the Complainant.

Violation 1: Excessive anonymous contributions

Background

Senator Eigel received a Cease and Desist order from David A. Warrington, counsel for Donald J. Trump for President 2024, INC. (see Attachment) Senator Eigel's political action committee Believe In Life and Liberty PAC (BILL PAC) to stop using President Trump's name, image, likeness, and voice while implying support or connection to President Trump and his campaign. Senator Eigel's PAC and its vendor was rightly accused of *"deceiving donors of their hard earned dollars by making false and deceptive statements by implying that donations would go to support Trump, and that by donating the donor would 'Stand with Trump'."* The Cease and Desist letter went on to quote one defrauded donor *"it is extremely underhanded for these PACs to use the candidates name and image and words and quotes and all that"* to imply an affiliation with President Trump and his campaign.

The letter continued to note that *"neither Bill Eigel nor his BILL PAC have anything to do with President Trump, or his campaign. He knows it and Targeted Victory knows it."* Further, the letter notes *"this deceptive practice is unacceptable and destructive of the MAGA movement. It tarnishes the Trump movement's reputation, harms the relation between President Trump and his supporters, and exploits the goodwill and character of patriotic Americans whom you were manipulating out of money by lies and misdirection. Worse yet, is the cynicism evident in the donors you have targeted: your campaign has targeted thousands of people who are on a fixed income, people who are disabled and retired, for whom a donation of \$10 is an important sacrifice and for whom your maneuver for tricking them into recurring donations imposes real hardship."*

In closing, the letter noted that *"already this year, two individuals were sentenced to a combined 17 years in prison for running a scam PAC that used President Trump's voice to scam well meaning supporters out of millions of dollars."*

Politico reported, "When you deceive the President's donors and usurp his brand for your own profit, you drain him of the financial resources his campaign needs to defeat Joe Biden and Make America Great Again," the Trump campaign officials wrote earlier this year.

Senator Eigel used these donations that he received under false pretenses to inflate his grassroots support while criticizing his opponents. See below excerpt from the Post-Dispatch.

Comer, 59, in May donated \$10 to a political action committee supporting Eigel, records show. Eigel has pointed to

thousands of small donations such as Comer's as evidence of grassroots support.

"For every special interest check or endorsement received by my opponents, a thousand people donated to my message and cause," Eigel said in July.

But there's a problem: Comer, who said she lives on a fixed income of less than \$1,000 a month, reported Thursday she has never heard of Eigel and doesn't follow Missouri politics.

"I don't know who he is," she told the Post-Dispatch. "I can't afford it."

After endorsing Senator Ted Cruz over Trump in 2016 and said that Trump was not his "first, second, or third choice" and in 2022 when he thought of a leader he replied with Ron DeSantis. Yet Senator Bill Eigel had the audacity to run a fundraising scam for his own benefit using the guise that money sent to him would help Donald Trump, when in truth he has shown he opportunistically used the MAGA brand for personal gain.

To add more insult, Senator Bill Eigel's Pac was too embarrassed to report who the contributions were from so news agencies or regulators wouldn't be able to track the individuals who were defrauded, BILL PAC violated the law in exceeding aggregate anonymous contribution limits.

RSMO 130.031(5) limits aggregate anonymous contributions "in any calendar year" to "the greater of five hundred dollars or one percent of the aggregate amount of all contributions received by that committee in the same calendar year." It further states that all anonymous donations above that threshold "shall be returned immediately" or transmitted "immediately" to the state treasurer.

BILL PAC's July quarterly report, filed July 17, 2023, reports \$144,219.70 in anonymous contributions. If true, this would mean the PAC was unable to identify a minimum of 5,768 individual anonymous donors (if all gave the maximum allowable anonymous donation of \$25)—a colossal failure of campaign accounting. No anonymous contributions were reported in the Q1, Q3, or Q4 reports.

The reported aggregate anonymous contributions make up 8.7% of the committee's reported calendar year 2023 receipts of \$1,648,292.63, an amount that far surpasses the 1% limit established by RSMO 130.031(5).

Violation 2: Late 48-hour report

RSMO 130.044 requires committees to “electronically report any contribution by any single contributor which exceeds five thousand dollars to the Missouri ethics commission within forty-eight hours of receiving the contribution.”

On July 20, 2023, BILL PAC reported a \$25,000 contribution from The Simon Law Firm which was received on June 30, 2023.

I request an immediate investigation into the violations described above and any other issues that may arise during the course of the review.

VERIFICATION BY OATH OR AFFIRMATION

STATE OF MISSOURI)
) ss.
COUNTY OF _____)

I, _____, being duly sworn upon oath or affirmation legally administered, 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 _____ day of _____, 2024.

Notary Public

My Commission Expires: _____