

IN THE  
**United States Court of Appeals for the Eighth Circuit**

SR. KATE REID ET AL.,

*Plaintiffs-Appellees,*

*v.*

THE DOE RUN RESOURCES CORPORATION ET AL.,

*Defendants-Appellants.*

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**DEFENDANTS-APPELLANTS' OPPOSITION TO  
PLAINTIFFS-APPELLEES' MOTION TO CORRECT,  
OR IN THE ALTERNATIVE TO STRIKE, THE STATE OF  
MISSOURI'S AMICUS BRIEF**

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Pursuant to Federal Rule of Appellate Procedure 27, Defendants-Appellants oppose Plaintiffs' motion. Plaintiffs have accused Defendants and the Missouri Attorney General—the highest law enforcement officer in the State of Missouri—of serious misconduct without a shred of evidence of wrongdoing. In their reckless motion, which is nothing more than a pretext for character assassination, Plaintiffs grossly misrepresent the facts and their motion should be denied out of hand.

1. Plaintiffs' motion begins by boldly asserting that “[l]ess than three months” after “Missouri’s Attorney General, Andrew

Bailey, filed an amicus brief supporting [Defendants],” “he received a large campaign donation from [Defendant The Renco Group Inc. (“Renco”).” Mot. at 1. That inaccurate headline, appearing prominently on the first page of the motion, is *not*, however, supported by the contents of the motion itself. Several pages later, Plaintiffs clarify that Renco did not make *any* donation to the Missouri Attorney General or his PAC. Instead, it “made a \$50,000 contribution to the Liberty and Justice PAC.” Mot. at 3. But a donation to that PAC is *not* a direct or indirect donation to the Attorney General.

2. The news article cited by Plaintiffs does not suggest otherwise. They cite an article from December 2022 for the proposition that the Liberty and Justice PAC “fundraises for General Bailey’s 2024 re-election campaign.” Mot. at 3. That statement does *not* accurately reflect what the article says. *See* Mot. Ex. C. The article explains that the Liberty and Justice PAC is “one of a constellation of PACs affiliated with lobbyist Steve Tilley,” “a former [Missouri] lawmaker, “longtime friend and adviser to [Missouri Governor] Parson,” and “major fundraiser for [Missouri] GOP candidates.” Ex. C at 1-2. The article further details that donations from a single fundraiser for

General Bailey hosted by Tilley in December 2022 were directed to the Liberty and Justice PAC because, at that time, General “Bailey ha[d] yet to form a political action committee” of his own. *Id.* But that December 2022 fundraising event had nothing to do with the September 2023 donation to the Liberty and Justice PAC donation targeted by Plaintiffs here. And at the time the donation made here to the Liberty and Justice PAC, that PAC was *not* funding the Attorney General’s campaign efforts.

3. By January 2023, the Attorney General had his own PAC, the “Bailey for Missouri” PAC, to support General Bailey’s re-election campaign. *See* Ex. 1. Thus, if one wanted to donate to the Attorney General after January 2023, the donation would be directed to his PAC. Plaintiffs do not allege, and the public record does not show, that any Defendants have made any contributions to that PAC, because there were none.

4. A September 2023 donation to the Liberty and Justice PAC, such as the one cited by Plaintiffs here, is not in any way a direct or indirect donation to the Attorney General. Notably, the Liberty and Justice PAC’s most recent quarterly report (filed in October 2023 and

covering the period of Renco's contribution) *shows no disbursements whatsoever to General Bailey's campaign, see Ex. 2 at 7-8.* That is unsurprising given that now that the Bailey for Missouri PAC exists for such purposes. Instead, the report shows that most of the Liberty and Justice PAC's expenditures appear to be on Governor Parson's behalf. For example, Liberty and Justice disclosed an expenditure for "Parson for Missouri," *id.* at 8, which is Governor Parson's individual campaign committee, *see Ex. 3 at 2.*

5. None of that supports the irresponsible accusation made by Plaintiffs here. In sum, Plaintiffs either utterly failed to do the bare minimum of due diligence before lodging outrageous accusations against both Defendants and the Missouri Attorney General, or willfully ignored information in the public record clearly disproving their accusation in order to cast Defendants in a bad light on appeal.

6. Defendants unequivocally deny Plaintiffs' baseless accusation that "payments were made in return for official action." Mot. at 5 (citing *United States v. Bruno*, 661 F.3d 733, 744 (2d Cir. 2011)). Defendants have for decades supported various candidates and PACs, but did not direct any contribution to the Attorney General and

the donation made to the Liberty and Justice PAC was in no way an effort to induce the Missouri Attorney General to file an *amicus* brief in this case.

7. It bears noting the severity of Plaintiffs' accusation. As Plaintiffs' citation to the Second Circuit's decision in *Bruno* makes clear, offering or accepting payments in return for official action is potentially a federal criminal offense. There was no basis whatsoever for Plaintiffs to accuse both Defendants and the Missouri Attorney General of such a serious offense. But having no meaningful rebuttal to the eminently obvious proposition offered by the Missouri Attorney General—that the State of Missouri has no interest in the adjudication of the claims of Peruvian citizens allegedly injured by emissions in Peru—Plaintiffs have resorted to character assassination. Their motion is meritless.

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For the foregoing reasons, Defendants-Appellants respectfully request that Plaintiffs-Appellee' baseless motion be denied.

October 20, 2023

Respectfully submitted,

/s/ Robert M. Loeb

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## CERTIFICATE OF COMPLIANCE

The motion opposition complies with the type-volume limitation of Fed. R. App. P. 27(d)(2) because this motion contains 836 words, excluding the parts of the motion exempted by Fed. R. App. P. 27(a)(2)(B) and Fed. R. App. P. 32(f).

This motion complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because this motion has been prepared in a proportionally spaced typeface using Microsoft Word for Microsoft 365 in Century Schoolbook 14-point font.

This motion has been scanned for viruses pursuant to Eighth Circuit Local Rule 28A(h)(2) and is virus-free.

ORRICK, HERRINGTON & SUTCLIFFE LLP

/s/ Robert M. Loeb

Robert M. Loeb

*Counsel for Defendants-Appellants*

## CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Eighth Circuit by using the appellate CM/ECF system on October 20 2023. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

ORRICK, HERRINGTON & SUTCLIFFE LLP

/s/ Robert M. Loeb

Robert M. Loeb

*Counsel for Defendants-Appellants*



# Exhibit 1

C232368



Missouri Ethics Commission (MEC)

PO Box 1370, Jefferson City MO 65102, Fax: 573-526-4506, helpdesk@mec.mo.gov

Statement of Committee Organization

JAN 10 2023 HAND DELIVERED

1. Statement Information

Date: 1/9/2023

Type: [X] New [ ] Amended (if amending, enter MEC ID \_\_\_\_\_ & section changed \_\_\_\_\_)

2. Committee Information

Bailey for Missouri

Name of Committee

PO Box 491 Jefferson City, MO 65102

Committee Mailing Address, City, State, & Zip

(573) 750-4100

Telephone Number

Cole County

County Clerk, Board of Election Commissioners, or Federal PAC/Out of State Committee

Official Committee Email Address

Committee Type: [ ] Campaign [X] Candidate [ ] Continuing (PAC) [ ] Debt Service [ ] Exploratory [ ] Political Party

3. Treasurer/Deputy Treasurer Information

Marc Ellinger

Treasurer's Name (First & Last)

751 Turnberry Jefferson City, MO 65109

Treasurer's Mailing Address, City, State, & Zip

Treasurer's Email Address (optional)

( )

Treasurer's Home Telephone Number

(573) 750-4100

Treasurer's Work Telephone Number

Deputy Treasurer's Name (if one appointed)

Deputy Treasurer's Email Address (optional)

( )

Dep. Treasurer's Home Telephone Number

( )

Dep. Treasurer's Work Telephone Number

Deputy Treasurer's Mailing Address, City, State, & Zip

4. Additional Committee Information

Additional Committee Officer's Name & Title (if any)

Additional Committee Officer's Mailing Address, City, State, & Zip

Connected Organization's Name (if any)

Connected Organization's Mailing Address, City, State, & Zip

CANDIDATES: Do you have more than one candidate committee? [ ] Yes (refer to instructions on back) [X] No

5. Official Bank Account Information (required by all committees)

6. Candidate Supported or Opposed (candidate committees must include self, if candidate)

Andrew Bailey PO Box 491 Jefferson City, MO 65102

Name & Mailing Address, City, State & Zip of Candidate

(573) 821-9516

Telephone Number (Candidate Committees Only)

8/6/2024

Election Date

Attorney General, State

Office Sought & Political Subdivision

Republican

Political Party

Support

Support or Oppose

7. Ballot Measure Supported or Opposed (campaign committees must complete this section)

Name of Ballot Measure

Election Date & Political Subdivision

Support or Oppose

8. Signature(s) - Check certification(s) & sign (required by all committees)

[X] I affirm and attest under penalty of perjury that information and facts in this report are complete, true, and accurate. I further acknowledge that I am aware that any false statement or declaration made herein is punishable under Ch. 575 RSMo.

Committee Treasurer

Candidate (Candidate Committees Only)

# Exhibit 2



Missouri Ethics Commission  
**COMMITTEE DISCLOSURE REPORT COVER PAGE**

M.E.C. ID NO. C222296

1. DATE OF REPORT 10/11/2023	OFFICE USE ONLY
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INSTRUCTIONS ON REVERSE SIDE

2. FULL NAME OF COMMITTEE  
 Liberty and Justice PAC

3. COMMITTEE MAILING ADDRESS  
 222 West Columbia Street

4. COMMITTEE TELEPHONE NUMBER  
 (573) 631-0039

CITY / STATE / ZIP  
 Farmington MO 63640

5. TREASURER'S NAME  
 Tom Burcham

6. TREASURER'S MAILING ADDRESS  
 222 West Columbia Street

7. TREASURER'S TELEPHONE NUMBER  
 HOME: (573) 631-0039

CITY / STATE / ZIP  
 Farmington MO 63640

WORK: (573) 756-5014

8. DEPUTY TREASURER'S NAME  CHECK IF NO DEPUTY TREASURER

9. DEPUTY TREASURER'S MAILING ADDRESS

10. DEPUTY TREASURER'S TELEPHONE NUMBER  
 HOME:

CITY / STATE / ZIP

WORK:

11. DATE OF ELECTION

12. TYPE OF ELECTION ( CHECK ONE )  
 PRIMARY  GENERAL  SPECIAL

13. TIME PERIOD COVERED BY THIS STATEMENT  
 FROM 7/1/2023 THROUGH 9/30/2023

14. CANDIDATE COMMITTEES ONLY: LIST CANDIDATE'S NAME, ADDRESS, PHONE, OFFICE SOUGHT, POLITICAL SUBDIVISION AND POLITICAL PARTY

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 Oct 11 2023 12:51PM

\_\_\_\_\_  
 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 Oct 11 2023 12:51PM

\_\_\_\_\_  
 CANDIDATE'S SIGNATURE



**Missouri Ethics Commission**  
**REPORT SUMMARY**  
 Instructions on Reverse Side

Name of Committee Liberty and Justice PAC	Date of Report 10/11/2023	Office Use Only
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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		\$ 814,741.53	<b>Money On Hand</b>			
2. All Monetary Contributions Received This Period	\$ 112,000.00					
3. All Loans Received This Period	+ 0.00					
4. Miscellaneous Receipts This Period	+ 0.00				24. Money On Hand at the beginning of this reporting period (Including funds in depository, cash, savings accounts and all other investments)	\$ 778,108.87
5. <b>Subtotal</b> Monetary Receipts This Period (Sum 2A + 3A + 4A)	\$ 112,000.00				25. Monetary Receipts this Period (From Item 5 - this page)	+ 112,000.00
6. In-kind Contributions Received This Period	+ 0.00				26. Monetary Disbursements Made This Period (Sum 10 + 16A + 23)	- 18,321.60
7. <b>Total</b> All Receipts This Period (Sum 5A + 6A)	\$ 112,000.00				a) Disbursements By Check \$ 18,321.60 b) Disbursements By Cash \$ 0.00	
8. <b>Total All Receipts This Election</b> (Sum 1B + 7A)		\$ 926,741.53			27. Money On Hand at the close of this reporting period (SUM 24 + 25 - 26)	\$ 871,787.27
Expenditures	A. This Period	B. This Calendar Yr or Election Cycle	<b>Indebtedness</b>			
9. Total Expenditures for this election previously reported		\$ 27,416.13	28. Outstanding Indebtedness at the beginning of this period	\$ 0.00		
10. Expenditures made by cash or check this period	\$ 18,321.60		29. Loans Received This Period	+ 0.00		
11. In-Kind Expenditures made this period	+ 0.00		30. A. New Expenditures Incurred This Period (include payments by Credit Card (Line 17 CD3)	+ 0.00		
12. Expenditures incurred this period (not including loans) including payments made by credit card (line 17 CD3)	+ 0.00		B. New Contributions Made by Credit Card (Line 25B CD3)	+ 0.00		
13. <b>Total</b> All expenditures made this period (Sum 10A + 11A + 12A) Including payments made by Credit Card (line 17 CD3)	\$ 18,321.60		31. Payments Made on Loans This Period	- 0.00		
14. <b>Total Expenditures This Election</b> (Sum 9B + 13A)		\$ 45,737.73	32. Debt Forgiven on Loans 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		\$ 0.00	33. Payments Made This Period on Expenditures Incurred in Previous Period (Paid by Cash/Check Only) (Line 21 this page)	- 0.00		
16. All Contributions Made This Period (25A or 25B of CD3)	A 0.00	← Cash/Check	34. Total Indebtedness at the Close of This Reporting Period (Sum 28 + 29 + 30A + 30B - 31 - 32 - 33)	\$ 0.00		
	B 0.00	← Credit Card				
17. All In-Kind Contributions Made This Period	+ 0.00					
18. <b>Total</b> Contributions Made This Period (Sum 16A + 17A)	\$ 0.00					
19. <b>Total All Contributions Made This Election</b> (Sum 15B + 18A)		\$ 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	+ 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	+ 0.00					
23. <b>Total Other Disbursements This Period</b> (Sum 20A + 21A + 22A)	\$ 0.00					



**MISSOURI ETHICS COMMISSION**  
**CONTRIBUTIONS AND LOANS RECEIVED**  
 INSTRUCTIONS ON REVERSE SIDE

OFFICE USE ONLY

1. NAME OF COMMITTEE Liberty and Justice PAC		2. REPORT DATE 10/11/2023	
<b>A. ITEMIZED CONTRIBUTIONS RECEIVED</b> 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: CITY / STATE: View Supplemental Form(s) EMPLOYER: <input type="checkbox"/> COMMITTEE:		\$ ..... \$	\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:		\$ ..... \$	\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:		\$ ..... \$	\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:		\$ ..... \$	\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:		\$ ..... \$	\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:		\$ ..... \$	\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
6. SUBTOTAL: ITEMIZED CONTRIBUTIONS THIS PAGE (SUM COLUMN 5)		\$	0.00
7. SUBTOTAL: ITEMIZED CONTRIBUTIONS ANY ATTACHED PAGES		+ \$	112,000.00
8. TOTAL: ITEMIZED CONTRIBUTIONS THIS PERIOD (SUM 6 + 7)		\$	112,000.00
9. AMOUNT OF ITEM 8 THAT WAS RECEIVED AS <b>MONETARY</b> CONTRIBUTIONS		\$	112,000.00
10. AMOUNT OF ITEM 8 THAT WAS RECEIVED AS <b>IN-KIND</b> CONTRIBUTIONS		\$	0.00
<b>B. NON-ITEMIZED CONTRIBUTIONS RECEIVED</b> (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
<b>C. LOANS RECEIVED</b>			
15. NAME AND ADDRESS OF LENDER		16. DATE RECEIVED	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)		\$	112,000.00
23. MONETARY CONTRIBUTIONS & LOANS RECEIVED REQUIRING A RECORD OF NAME & ADDRESS (SUM 9, 13 & 20)		\$	112,000.00



**MISSOURI ETHICS COMMISSION  
CONTRIBUTIONS RECEIVED - SUPPLEMENTAL**

OFFICE USE ONLY

NAME OF COMMITTEE Liberty and Justice PAC	DATE 10/11/2023
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**INSTRUCTIONS**

**PURPOSE:** The purpose of the Contributions Received supplement is to provide a printed outline for attaching additional pages to Form CD1 (Contributions Received). This form should be used as additional space for reporting persons contributing more than \$100 and for committee contributions. This form may be reproduced as needed.

Total all itemized contributions at the bottom of the page and carry to item 7 (Subtotal: Itemized Contributions From Any Attached Pages) on Form CD-1.

If further information is needed concerning reporting itemized expenditures, see Form CD-1 Instructions.

A. ITEMIZED CONTRIBUTIONS RECEIVED FROM COMMITTEES REGARDLESS OF THE AMOUNT, OR FROM PERSONS GIVING MORE THAN \$100 TO A COMMITTEE. 3. NAME, ADDRESS AND OCCUPATION (LIST COMMITTEES FIRST)	4. DATE RECEIVED ----- AGGREGATE TO DATE	5. AMOUNT RECEIVED (CHECK IF MONETARY OR IN-KIND)
NAME: ADDRESS: XCaliber Interantional LTD LLC CITY/STATE: 4747 NE 1ST ST EMPLOYER: Pryor OK 74361 <input type="checkbox"/> COMMITTEE:	7/18/2023 ----- \$ 25,000.00	\$ 10,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Missouri Beer Wholesalers Association CITY/STATE: 2305 Expressview Dr EMPLOYER: Jefferson City MO 65101 <input type="checkbox"/> COMMITTEE:	8/21/2023 ----- \$ 10,000.00	\$ 10,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Spire Missouri Inc. CITY/STATE: 700 Market Street EMPLOYER: St Louis MO 63101 <input type="checkbox"/> COMMITTEE:	7/24/2023 ----- \$ 2,500.00	\$ 2,500.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Husch Blackwell CITY/STATE: 217 E Capitol Avenue EMPLOYER: Jefferson City MO 65101 <input type="checkbox"/> COMMITTEE:	9/21/2023 ----- \$ 1,000.00	\$ 1,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Rely on Your Beliefs Fund Campaign CITY/STATE: 824 S Milledge Ave EMPLOYER: Athens GA 30605 <input type="checkbox"/> COMMITTEE:	9/21/2023 ----- \$ 1,000.00	\$ 1,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: The Renco Group, Inc. CITY/STATE: One Rockefeller Plaza EMPLOYER: New York City NY 10020 <input type="checkbox"/> COMMITTEE:	9/18/2023 ----- \$ 50,000.00	\$ 50,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Continental Investment LLC CITY/STATE: 221 Bollivar St EMPLOYER: Jefferson City MO 65109 <input type="checkbox"/> COMMITTEE:	8/28/2023 ----- \$ 2,500.00	\$ 2,500.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Cheyenne International LLC CITY/STATE: 120 S Central Ave EMPLOYER: Clayton MO 63105 <input type="checkbox"/> COMMITTEE:	9/22/2023 ----- \$ 15,000.00	\$ 15,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND

<b>TOTAL: ITEMIZED CONTRIBUTIONS</b>		<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>
(CARRY TO ITEM 7 "SUBTOTAL: ITEMIZED CONTRIBUTIONS FROM ANY ATTACHED PAGES" ON FORM CD-1)		



**MISSOURI ETHICS COMMISSION  
CONTRIBUTIONS RECEIVED - SUPPLEMENTAL**

OFFICE USE ONLY

NAME OF COMMITTEE Liberty and Justice PAC	DATE 10/11/2023
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**INSTRUCTIONS**

**PURPOSE:** The purpose of the Contributions Received supplement is to provide a printed outline for attaching additional pages to Form CD1 (Contributions Received). This form should be used as additional space for reporting persons contributing more than \$100 and for committee contributions. This form may be reproduced as needed.

Total all itemized contributions at the bottom of the page and carry to item 7 (Subtotal: Itemized Contributions From Any Attached Pages) on Form CD-1.

If further information is needed concerning reporting itemized expenditures, see Form CD-1 Instructions.

A. ITEMIZED CONTRIBUTIONS RECEIVED FROM COMMITTEES REGARDLESS OF THE AMOUNT, OR FROM PERSONS GIVING MORE THAN \$100 TO A COMMITTEE. 3. NAME, ADDRESS AND OCCUPATION (LIST COMMITTEES FIRST)	4. DATE RECEIVED ----- AGGREGATE TO DATE	5. AMOUNT RECEIVED (CHECK IF MONETARY OR IN-KIND)
NAME: ADDRESS: GJ Grewe Inc CITY/STATE: 639 Gravois Bluffs Blvd EMPLOYER: St Louis MO 63026 <input type="checkbox"/> COMMITTEE:	9/26/2023 ----- \$ 10,000.00	\$ 10,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: NRRM, LLC CITY/STATE: 503 Pearl Dr EMPLOYER: St Peters MO 63376 <input type="checkbox"/> COMMITTEE:	9/25/2023 ----- \$ 10,000.00	\$ 10,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:	----- \$	\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:	----- \$	\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:	----- \$	\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:	----- \$	\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:	----- \$	\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:	----- \$	\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND

**TOTAL: ITEMIZED CONTRIBUTIONS** --

(CARRY TO ITEM 7 "SUBTOTAL: ITEMIZED CONTRIBUTIONS FROM ANY ATTACHED PAGES" ON FORM CD-1)





**MISSOURI ETHICS COMMISSION**  
**EXPENDITURES AND CONTRIBUTIONS MADE**  
 Instructions on Reverse Side

Office Use Only

1. Name of Committee Liberty and Justice PAC		2. Report Date 10/11/2023	
<b>A. Expenditures of \$100 or Less by Category</b> (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			+ 524.45
7. Total: Non-Itemized Expenditures This Period (Sum 5 + 6)			\$ 524.45
<b>B. Itemized Expenditures All Over \$100</b> And All Payments To Campaign Workers		9. Date	10. Purpose - (If Payment was to a Campaign Worker, Show Aggregate Paid)
8. Name and Address of Recipient			11. Amount This Period
Name:			\$
Address:			<input type="checkbox"/> Paid
City / State:			<input type="checkbox"/> Incurred
Name: View Supplemental Form(s)			\$
Address: View Supplemental Form(s)			<input type="checkbox"/> Paid
City / State:			<input type="checkbox"/> Incurred
Name:			\$
Address:			<input type="checkbox"/> Paid
City / State:			<input type="checkbox"/> Incurred
12. Subtotal: This Page ( Sum Column 11)			\$ 0.00
13. Subtotal: Any Attached Pages			+ 17,797.15
14. Total: Itemized Expenditures This Period (Sum 12 + 13)			\$ 17,797.15
15. Total: Monetary Expenditures This Period (Sum 7 + 14)			\$ 18,321.60
16. Amount of Line 15 Above which was Paid Out This Period			\$ 18,321.60
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)			\$ 0.00
<b>C. Contributions Made (Regardless of Amount)</b>		21. Date	22. Amount
20. Name and Address of Candidate or Committee			\$
Name:			<input type="checkbox"/> Monetary
Address:			<input type="checkbox"/> In-Kind
City / State:			\$
Name:			<input type="checkbox"/> Monetary
Address:			<input type="checkbox"/> In-Kind
City / State:			\$
Name:			<input type="checkbox"/> Monetary
Address:			<input type="checkbox"/> In-Kind
City / State:			\$
23. Subtotal: This Page (Sum Column 22)			\$ 0.00
24. Subtotal: Any Attached Pages			\$ 0.00
25. Total: Monetary Contributions Made This Period		A. By Cash / Check	\$ 0.00
		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)			\$ 0.00
28. Total: In-Kind Contributions Made This Period, List Amount			\$ 0.00



MISSOURI ETHICS COMMISSION  
**EXPENDITURES OF \$100 OR LESS BY CATEGORY - SUPPLEMENTAL FORM**

OFFICE USE ONLY

NAME OF COMMITTEE Liberty and Justice PAC	DATE 10/11/2023
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<b>EXPENDITURES OF \$100 OR LESS BY CATEGORY</b> (LIST PAYMENTS TO CAMPAIGN WORKERS IN SECTION B ON FORM CD3 OR USE FORM CD3 SUP B) CATEGORY OF EXPENDITURE	AMOUNT PAID OR INCURRED THIS PERIOD
IRS Payroll Taxes	\$ 88.28
IRS Payroll Taxes	\$ 88.26
Ordered printable checks	\$ 83.09
IRS Payroll Taxes	\$ 88.28
IRS Payroll Taxes	\$ 88.26
IRS Payroll Taxes	\$ 88.28
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
<b>TOTAL: ITEMIZED EXPENDITURES THIS PAGE</b>  (CARRY TO ITEM 13. "SUBTOTAL: ANY ATTACHED PAGES" ON FORM CD-3)	\$ --



**MISSOURI ETHICS COMMISSION  
ITEMIZED EXPENDITURES OVER \$100 SUPPLEMENTAL FORM**

OFFICE USE ONLY

NAME OF COMMITTEE Liberty and Justice PAC		REPORT DATE 10/11/2023		
ITEMIZED EXPENDITURES ALL OVER \$100 AND ALL PAYMENTS TO CAMPAIGN WORKERS		DATE	PURPOSE - (IF PAYMENT WAS TO A CAMPAIGN WORKER, SHOW AGGREGATE PAID)	AMOUNT THIS PERIOD
NAME AND ADDRESS OF RECIPIENT				
NAME: Boyd & Associates ADDRESS: 214 W Columbia St. CITY/STATE: Farmington MO 63640		7/11/2023	Accounting \$	\$ <input checked="" type="checkbox"/> PAID 343.00 <input type="checkbox"/> INCURRED
NAME: Shannon Tidwell ADDRESS: PO Box 1436 CITY/STATE: Jefferson City MO 65102		7/21/2023	Campaign Worker \$ 6,393.42	\$ <input checked="" type="checkbox"/> PAID 532.78 <input type="checkbox"/> INCURRED
NAME: Shannon Tidwell ADDRESS: PO Box 1436 CITY/STATE: Jefferson City MO 65102		7/10/2023	Fuel, Food, Travel Reimbursemt \$	\$ <input checked="" type="checkbox"/> PAID 1,346.97 <input type="checkbox"/> INCURRED
NAME: Creator Designs Inc. ADDRESS: 522 W. Aldrich CITY/STATE: Bolivar MO 65613		7/17/2023	Advertising \$	\$ <input checked="" type="checkbox"/> PAID 940.47 <input type="checkbox"/> INCURRED
NAME: Look Ahead Strategies ADDRESS: 1500 Wilson Blvd 5th Floor CITY/STATE: Arlington VA 22209		7/20/2023	Field Research \$	\$ <input checked="" type="checkbox"/> PAID 3,000.00 <input type="checkbox"/> INCURRED
NAME: Tidwell ADDRESS: PO Box 1436 CITY/STATE: Jefferson City MO 65102		8/4/2023	Campaign Worker \$ 6,926.21	\$ <input checked="" type="checkbox"/> PAID 532.79 <input type="checkbox"/> INCURRED
NAME: State of Missouri ADDRESS: PO Box 1370 CITY/STATE: Jefferson City MO 65102		7/26/2023	Late fee on 48hr In-Kind contribution \$	\$ <input checked="" type="checkbox"/> PAID 770.00 <input type="checkbox"/> INCURRED
NAME: Tidwell ADDRESS: PO Box 1436 CITY/STATE: Jefferson City MO 65102		8/18/2023	Campaign Worker \$ 7,458.99	\$ <input checked="" type="checkbox"/> PAID 532.78 <input type="checkbox"/> INCURRED
NAME: Parson for Missouri ADDRESS: PO Box 1004 CITY/STATE: Bolivar MO 65613		8/3/2023	Mailing List \$	\$ <input checked="" type="checkbox"/> PAID 1,500.00 <input type="checkbox"/> INCURRED
NAME: Shannon Tidwell ADDRESS: PO Box 1436 CITY/STATE: Jefferson City MO 65102		9/1/2023	Campaign Worker \$ 7,991.78	\$ <input checked="" type="checkbox"/> PAID 532.79 <input type="checkbox"/> INCURRED
NAME: Cardinal Strategies LLC ADDRESS: 1722 L Street NE CITY/STATE: Washington DC 20002		9/5/2023	Fundraising \$	\$ <input checked="" type="checkbox"/> PAID 6,250.00 <input type="checkbox"/> INCURRED
NAME: Shannon Tidwell ADDRESS: PO Box 1436 CITY/STATE: Jefferson City MO 65102		9/15/2023	Campaign Worker \$ 8,524.56	\$ <input checked="" type="checkbox"/> PAID 532.78 <input type="checkbox"/> INCURRED
NAME: Shannon Tidwell ADDRESS: PO Box 1436 CITY/STATE: Jefferson City MO 65102		9/29/2023	Campaign Worker \$ 9,057.35	\$ <input checked="" type="checkbox"/> PAID 532.79 <input type="checkbox"/> INCURRED
NAME: Campaign Consulting LLC ADDRESS: 152 North Brentwood Boulevard Suite A CITY/STATE: Clayton MO 63105		9/29/2023	Book Keeping \$	\$ <input checked="" type="checkbox"/> PAID 450.00 <input type="checkbox"/> INCURRED
NAME: ADDRESS: CITY/STATE:			\$	\$ <input type="checkbox"/> PAID <input type="checkbox"/> INCURRED
<b>TOTAL: ITEMIZED EXPENDITURES ALL OVER \$100 AND ALL PAYMENTS TO CAMPAIGN WORKERS (CARRY TO ITEM 13. "SUBTOTAL: ANY ATTACHED PAGES" ON FORM CD-3)</b>				\$ --

# Exhibit 3

# Though Parson won't run for office again, PAC still raising money on his behalf

St. Louis Post-Dispatch (Missouri)

October 20, 2021 Wednesday

FINAL EDITION

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**Section:** NEWS; Pg. A2

**Length:** 539 words

**Byline:** By Kurt Erickson St. Louis Post-Dispatch

## Body

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JEFFERSON CITY - Missouri Gov. Mike Parson won't be on the ballot for any elective office after his term ends in 2024, but that doesn't mean one of his campaign committees is closing up shop.

In a quarterly fundraising report filed with the Missouri Ethics Commission, the Uniting Missouri political action committee said it raised \$263,550 in the three-month period ending Sept. 30.

The committee, which was formed to help Parson win a full, four-year term to the state's highest office in 2020, also spent \$92,400 during the period, leaving the PAC with \$175,500 on hand.

John Hancock, a spokesman for the PAC, said fundraising continues for the organization in order to give Parson a voice beyond that of his official role as Missouri's chief executive.

"We're supporting the governor's agenda. We're communicating with voters in support of his agenda," said Hancock, who co-hosts the weekly "Hancock and Kelley" television program on KTVI (Channel 2), the St. Louis Fox affiliate, with Democrat Michael Kelley. The duo also are frequent radio hosts on KMOX (1120 AM) in St. Louis.

The account can also pay for political trips, such as the \$2,190 bill that was paid for a visit to Big Cedar Lodge near Branson and \$234 in meals in Aspen, Colorado, in July.

The records show the PAC also spent more than \$24,000 on digital media for online videos comparing Parson's response to the COVID-19 pandemic to former New York Gov. Andrew Cuomo's.

Prior to the 2020 election, Parson, 66, told reporters that he would not run again for any office after having served as a county sheriff, a member of the Missouri House, a state senator, lieutenant governor and, currently, governor.

Though Parson won't run for office again, PAC still raising money on his behalf

"Yeah. I don't see that in my future," Parson said at the time. "I've been around long enough to say, 'Never say never.' But I'd say the first lady might say never."

Along with the Uniting Missouri account, Parson also has his individual campaign committee, known as Parson for Missouri.

That account has \$179,000, but the governor does not appear to be raising any money for it. At one point, the committee raised more than \$6 million.

His personal account also isn't being tapped for any large expenses. Among the few made during the third quarter was a \$200 bill for McDonald's in Kansas City.

Hancock said there are no plans to use any of the money in the Uniting Missouri account that's been raised to support a different candidate in future elections.

"We don't exist any longer to support any particular candidate," Hancock said.

It is not uncommon for politicians who no longer hold office to continue to raise money for political action committees.

Former House Speaker Tim Jones controls the Leadership for America PAC, which has \$530,000 as of Sept. 30. Former Speaker Steve Tilley is connected to a number of PACs that regularly funnel money to candidates.

Among those contributing to Uniting Missouri during the most recent reporting period was Midwest Cement Co. of Jefferson City, which wrote a \$25,000 check.

Springfield, Missouri-based Phoenix Home Care gave the PAC \$20,000. The Missouri Realtors contributed \$10,000.

Other expenditures include \$28,000 to Shannon Tidwell, who is listed as a campaign worker, and \$11,276 to Hancock's political consulting firm.

## Graphic

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Gov. Mike Parson leaves the House chambers after addressing a joint session of the legislature, Monday, June 11, 2018, at the capitol building in Jefferson City. Missouri Republican Gov. Mike Parson on Monday said it's time for a fresh start and called for unity as he addressed the Legislature for the first time since he took office following Eric Greitens resignation amid allegations of personal and political misconduct. (J.B. Forbes/St. Louis Post-Dispatch via AP) Missouri Gov. Mike Parson greets guests after the Missouri bicentennial program on Aug. 10 at the Capitol in Jefferson City.

**Load-Date:** October 20, 2021

Though Parson won't run for office again, PAC still raising money on his behalf

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