



Missouri Ethics Commission

Stacey Heislen
INTERIM EXECUTIVE DIRECTOR

Final Action: MEC No. 24-0061-I: American Dream PAC

Date: September 17, 2024

The Missouri Ethics Commission took final consideration of the complaint filed against American Dream PAC, at its September 17, 2024, meeting.

The complaint alleged that American Dream PAC inflated contributions received when it received a \$250,000 contribution, then reported a \$250,000 expenditure back to the contributor for “professional advisory retainer.”

Pursuant § 130.041.1(4)(d), RSMo, committees are required to disclose expenditures during the proper reporting period, with expenditures over \$100 to include the name and address of whom the expenditure was made to, with the date, amount and purpose of each such expenditure.

Upon completion of the investigation, evidence shows that on its first Amended January 2024 Quarterly report, American Dream PAC reported receiving a \$250,000 contribution from SNK Real Property Holdings on October 25, 2023, and a \$250,000 contribution from the same contributor on December 26, 2023. The first Amended January 2024 Quarterly report disclosed a \$250,000 expenditure to SNK Real Property Holdings on December 26, 2023, for the purpose of “professional advisory retainer.”

Prior to the date the complaint was received by the Missouri Ethics Commission, American Dream PAC filed a second Amended January 2024 Quarterly report for the purpose of changing the December 26, 2023, expenditure to SNK Real Property Holdings from “professional advisory retainer” to “refund of contribution.”

Therefore, while American Dream PAC did initially fail to accurately report the purpose of a \$250,000 expenditure to SNK Real Property Holdings, that error was corrected prior to the complaint being filed with the Missouri Ethics Commission.

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

Stacey Heislen
Interim Executive Director