



Missouri Ethics Commission

Stacey Heislen
INTERIM EXECUTIVE DIRECTOR

Final Action: MEC No. 24-0067-I: American Promise PAC, Victor Gunn - Treasurer, and James C. Thomas, III – Deputy Treasurer

Date: October 7, 2024

The Missouri Ethics Commission took final consideration of the complaint filed against American Promise PAC, Victor Gunn – Treasurer, and James C. Thomas, III – Deputy Treasurer, at its October 7, 2024, meeting. The complaint alleged American Promise PAC, its treasurer and deputy treasurer accepted contributions from LLCs not registered with the MEC.

Pursuant to §130.029.4, RSMo, (1) Any limited liability company that is duly registered pursuant to chapter 347 and that has not elected to be classified as a corporation under the federal tax code may make contributions to any committee if the limited liability company has:

- (a) Been in existence for at least one year prior to such contribution; and
- (b) Electronically filed with the Missouri ethics commission indicating that the limited liability company is a legitimate business with a legitimate business interest and is not created for the sole purpose of making campaign contributions.

Limited liability companies which *are* taxed as a corporation are *not* required to register with the MEC prior to making contributions. The MEC treats these LLCs as a corporation.

Upon completion of the investigation, evidence shows the fundraising consultant at Capitol Strategies Group confirmed AIG Virginia, LLC, 2s Investment, LLC, 2s Business Management, LLC, Pacifica Consulting, LLC, and Holiday Inn Express & Suites d/b/a Crown Hospitality, LLC have all elected to be classified as a corporation under the federal tax code and are not required to register with the MEC prior to making contributions to a continuing committee.

Therefore, the Commission finds no reasonable grounds to support one or more violations of Chapter 130 RSMo and dismiss.

Stacey Heislen
Interim Executive Director