

Filed

OCT 08 2025

Missouri Ethics
Commission

Case No. 24-0049-I (B)

and

Respondents.

The Missouri Ethics Commission (“MEC”), together with Committee for Liberty and Mark Milton (“Respondents”), collectively the “parties,” jointly stipulate and consent to action as set forth here (the “agreement”).

Respondents acknowledge their right to have this agreement reviewed by counsel. Respondents further acknowledge they have received actual notice of the legal complaint filed by the MEC in this case, have reviewed the contents of the Complaint, and submit to the jurisdiction of the Missouri Ethics Commission.

Respondents further acknowledge they are aware of the various rights and privileges afforded by law, including but not limited to: the right to appear and be represented by counsel at a hearing before the MEC; the right to have all allegations against Respondents proven upon the record by competent and substantial evidence;

the right to cross-examine any witnesses appearing at the hearing against Respondents; the right to present evidence on Respondents' behalf at the hearing; and the right to a decision upon the record of the hearing. Being aware of these rights, Respondents knowingly and voluntarily waive each one of these rights and freely enters into this agreement and agrees to abide by its terms.

I.

The parties mutually agree and stipulate, subject to adoption by the Missouri Ethics Commission, the following shall constitute the Findings of Fact and Conclusions of Law in this matter:

FINDINGS OF FACT

1. Committee for Liberty is a continuing committee registered with the MEC on August 15, 2019.
2. Mark Milton was, at all times relevant, the treasurer of Committee for Liberty.
3. Pursuant to § 105.961, the MEC's staff received a complaint against Respondents. Upon investigation of the allegations, a report was presented to the Commission.
4. The Commission determined there were reasonable grounds to believe violations of the law had occurred and authorized a hearing pursuant to § 105.961.3.
5. John Ashcroft was an unsuccessful candidate for Missouri Governor in the August 6, 2024, primary election.

6. Ashcroft for Missouri is a candidate committee registered with the MEC on January 6, 2015.

7. On or about March 8, 2024, a letter signed by Ashcroft on Ashcroft for Missouri's letterhead was mailed to voters discussing Ashcroft's political platform.

8. The letter uses language in support of Ashcroft's candidacy for Missouri Governor and in opposition to his opponents.

9. The letter included a paid for by disclosure which read, "PAID FOR BY ASHCROFT FOR MISSOURI, GENE MCNARY, TREASURER, AND COMMITTEE FOR LIBERTY, MARK MILTON, TREASURER".

10. Respondents paid \$5,361.74 for the letter which was reported as an expenditure on their July 2024 Quarterly Report.

11. Ashcroft for Missouri paid \$5,361.74 for the letter which was reported as an expenditure on its July 2024 Quarterly Report.

12. Respondents did not report the expenditure identified on their July 2024 Quarterly Report as in-kind contribution made to Ashcroft for Missouri.

13. Respondents did not report the expenditure identified on Ashcroft for Missouri's July 2024 Quarterly Report as an in-kind contribution received from Ashcroft for Missouri.

14. Ashcroft for Missouri did not report the expenditure identified on its July 2024 Quarterly Report as in-kind contribution made to Respondents.

15. Ashcroft for Missouri did not report the expenditure identified on Respondents' July 2024 Quarterly Report as an in-kind contribution received from Respondents.

CONCLUSIONS OF LAW

16. Section 130.041.1(8) sets forth the requirements for committees to report receipts for each reporting period on all disclosure reports:

A separate listing by full name and address of any committee including a candidate committee controlled by the same candidate for which a transfer of funds or a contribution in any amount has been made during the reporting period, together with the date and amount of each such transfer or contribution[.]

17. Section 130.041.1(9), RSMo requires committees to report receipts for each reporting period on all disclosure reports, requiring:

A separate listing by full name and address of any committee, including a candidate committee controlled by the same candidate from which a transfer of funds or a contribution in any amount has been received during the reporting period, together with the date and amount of each such transfer or contribution[.]

18. Section 130.041.1(3)(d) requires committees to report receipts for the "total value of all in-kind contributions received."

19. Where Respondents made a contribution of something of value to Ashcroft for Missouri and failed to report an in-kind contribution made to Ashcroft for Missouri; and where Respondents received a contribution of something of value from Ashcroft for Missouri and failed to report the in-kind contribution received, there is probable cause to believe Respondents violated §§ 130.041.1(8), 130.041.1(9),

and 130.041.1(3)(d), giving this Commission power to act, as permitted under § 105.961.

II.

Based on the foregoing, the parties mutually agree and stipulate, subject to adoption by the Missouri Ethics Commission, the following shall constitute the Order issued by the Missouri Ethics Commission in this matter:

CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe that: a) Respondents' cost of the letter is something of value given to Ashcroft for Missouri by Respondents; b) Ashcroft for Missouri's cost of the letter is something of value given to Respondents by Ashcroft for Missouri; and c) that Respondents, by not reporting its expenditure as an in-kind contribution to Ashcroft for Missouri, and by not reporting Ashcroft for Missouri's expenditure as an in-kind contribution received from Ashcroft for Missouri, thereby coordinated their efforts to purchase the letter in support of Ashcroft's candidacy and in opposition to his opponents, dividing the total cost of the letter between the two committees in violation of §§ 130.041.1(8), 130.041.1(9), and 130.041.1(3)(d), and pursuant to §105.961.4, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130.
2. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$5,361, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$536 within forty-five days after the date of the Consent Order, the remainder of the fee will be stayed. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.

3. Regardless of the stay in paragraph 2 above, if there is probable cause to believe that any Respondent commits any further violation of the campaign finance laws under Chapter 130, RSMo, within the two-year period from the date of this order, then the Respondent who committed the violation will be required to pay the remainder of the fees. The fee will be due immediately upon final adjudication finding that there was probable cause to believe that such Respondent has committed such a violation.
4. Respondents shall be jointly and severally liable for all fees imposed under this order.

III.

1. The parties understand the Missouri Ethics Commission will maintain this agreement as an open record of the Commission.
2. This agreement does not bind the Missouri Ethics Commission or restrict the remedies available concerning any violations not expressly detailed here, including any future violations.
3. Each party agrees to pay all their own fees and expenses incurred as a result of this case, its litigation, and/or its disposition.
4. Respondents, together with their heirs, assigns, agents, representatives and attorneys, do hereby waive, release, acquit and forever discharge the Missouri Ethics Commission, the Commission's respective members, employees, agents and attorneys including former members, employees, agents and attorneys, of, or from any liability, claim, actions, causes of action, fees, costs, expenses and compensation, including, but not limited to, any claim for attorney's fees and expenses, whether or not now known or contemplated, including, but not limited to, any claims pursuant to Section 536.087, RSMo, as amended, or any claim arising under 42 U.S.C. § 1983, which now or in the future may be based upon, arise out of, or relate to any of the

matters raised in this case or its litigation or from the negotiation or execution of this Joint Stipulation. The parties acknowledge that this paragraph is severable from the remaining portions of this agreement in that it survives in perpetuity even in the event that any court or administrative tribunal deems this agreement or any portion thereof void or unenforceable.

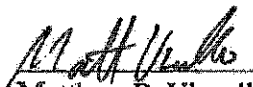
5. This agreement shall become effective immediately upon (1) the signature of all parties; (2) adoption of the Joint Proposed Findings of Fact, Conclusions of Law by the Missouri Ethics Commission; and (3) issuance of a Final Order by the Commission, without any further action of the parties.

SO AGREED:

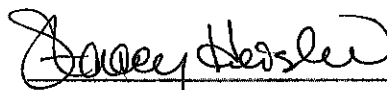
RESPONDENTS
COMMITTEE FOR LIBERTY and
MARK MILTON


Mark Milton
9/24/25
Date

ATTORNEY FOR RESPONDENT


Matthew B. Vianello
10/7/25
Date
Jacobson Press P.C.

MISSOURI ETHICS COMMISSION


Stacey Heislen
10/8/25
Executive Director
Date


Brian Hamilton
10/8/25
Attorney for Petitioner
Date

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

OCT 15 2025

**Missouri Ethics
Commission**

MISSOURI ETHICS	)	
COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 24-0049-I (B)
	)	
COMMITTEE FOR LIBERTY,	)	
Continuing Committee,	)	
	)	
and	)	
	)	
MARK MILTON, Treasurer,	)	
	)	
Respondents.	)	

CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe that: a) Respondents' cost of the letter is something of value given to Ashcroft for Missouri by Respondents; b) Ashcroft for Missouri's cost of the letter is something of value given to Respondents by Ashcroft for Missouri; and c) that Respondents, by not reporting its expenditure as an in-kind contribution to Ashcroft for Missouri, and by not reporting Ashcroft for Missouri's expenditure as an in-kind contribution received from Ashcroft for Missouri, thereby coordinated their efforts to purchase the letter in support of Ashcroft's candidacy and in opposition to his opponents, dividing the total cost of the letter between the two committees in violation of §§ 130.041.1(8), 130.041.1(9), and 130.041.1(3)(d), and pursuant to §105.961.4, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130.

2. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$5,361, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$536 within forty-five days after the date of the Consent Order, the remainder of the fee will be stayed. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.
3. Regardless of the stay in paragraph 2 above, if there is probable cause to believe that any Respondent commits any further violation of the campaign finance laws under Chapter 130, RSMo, within the two-year period from the date of this order, then the Respondent who committed the violation will be required to pay the remainder of the fees. The fee will be due immediately upon final adjudication finding that there was probable cause to believe that such Respondent has committed such a violation.
4. Respondents shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 15th day of October 2025



Jeremy Schneider
Missouri Ethics Commission