

BEFORE THE
MISSOURI ETHICS COMMISSION

Filed

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MISSOURI ETHICS
COMMISSION,

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Missouri Ethics
Commission

Petitioner,

Case No. 24-0084-I(A)

v.

DAVID JANSEN,

Respondent.

**JOINT FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND ORDER**

The Missouri Ethics Commission ("MEC"), together with David Jansen ("Respondent"), 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. Amendment 3 was a proposed amendment to the Missouri Constitution placed on the ballot for the November 5, 2024, statewide election.
2. Pursuant to § 105.961, the MEC's staff investigated a complaint filed with the Commission and reported the investigation findings to the Commission.
3. The Commission determined there were reasonable grounds to believe violations of the law occurred and authorized a hearing pursuant to § 105.961.3.

COUNT I

Failure to Include an Accurate Paid for By Disclosure

4. On September 30, 2024, Respondent used personal funds to purchase a billboard advertisement from DDI Media in opposition to the proposed Amendment 3 ballot measure.
5. The billboard should have contained the clear and conspicuous statement: "Paid for by David Jansen" along with his mailing address but did not.

COUNT II

Failure to File Non-Committee Expenditure Report

6. On September 30, 2024, Respondent purchased a billboard advertisement totaling \$1,666.66, from DDI Media in opposition of the proposed Amendment 3 ballot measure.

7. This expenditure should have been reported on a Non-Committee Expenditure Report filed with the Missouri Ethics Commission no later than October 15, 2024. Respondent has not filed a Non-Committee Expenditure Report.

CONCLUSIONS OF LAW

COUNT I

Failure to Include an Accurate Paid for By Disclosure

8. “Any person publishing, circulating, or distributing any printed matter relative to any candidate for public office or any ballot measure shall on the face of the printed matter identify in a clear and conspicuous manner the person who paid for the printed matter with the words ‘Paid for by’ followed by the proper identification of the sponsor pursuant to this section.” § 130.031.8, RSMo.

9. “[P]rinted matter’ shall be defined to include any pamphlet, circular, handbill, sample ballot, advertisement, including advertisements in any newspaper or other periodical, sign, including signs for display on motor vehicles, or other imprinted or lettered material[.]” § 130.031.8, RSMo.

10. Section 130.031.8, RSMo, further states the following:

(4) In regard to any printed matter paid for by an individual or individuals, it shall be sufficient identification to print the name of the individual or individuals and the respective mailing address or addresses[.] ... No person shall accept for publication or printing nor

shall such work be completed until the printed matter is properly identified as required by this subsection.

11. There is probable cause to believe that Respondent violated § 130.031.8(4), by purchasing and displaying a billboard advertisement which failed to include an accurate "Paid for by" disclosure.

COUNT II

Failure to File Non-Committee Expenditure Report

12. Pursuant to Section 130.047, RSMo, "Any person who is not a defined committee who makes an expenditure or expenditures aggregating five hundred dollars or more in support of, or opposition to... passage of one or more ballot measures... shall file a report signed by the person making the expenditures[.]... Such report shall be filed with the appropriate officer having jurisdiction over the election of the... ballot measure in question as set forth in section 130.026 no later than fourteen days after the date of making an expenditure which by itself or when added to all other such expenditures during the same campaign equals five hundred dollars or more."

13. Under § 130.026.2(5)(a), the "appropriate officer" for a statewide ballot measure is the Missouri Ethics Commission.

14. Where Respondent made an expenditure totaling \$1,666.66 for the purpose of opposing a ballot measure, and where Respondent failed to file a Non-Committee Expenditure Report as required, there is probable cause to believe Respondent violated § 130.047, giving this Commission the 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 Respondents violated §§ 130.031.8(4) and 130.047, and pursuant to § 105.961.4, hereby **ORDERS**:

1. Prior to finalizing settlement, Respondents will be required to file and amend reports and statements with the Commission.
2. Respondents shall comply with all relevant sections of Chapter 130.
3. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$1,766.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$266.00 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.
4. Regardless of the stay in paragraph 3 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.
5. 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.

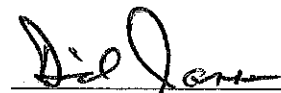
5. This agreement shall become effective immediately upon (1) the signature of all parties; (2) adoption of the Joint Proposed Findings of Fact,

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:

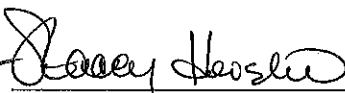
RESPONDENT DAVID JANSEN

MISSOURI ETHICS COMMISSION


David Jansen

10-22-25

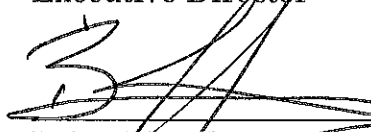
Date



Stacey Heislen
Executive Director

10/24/2025

Date


Brian Hamilton
Attorney for Petitioner

10/24/25

Date

