

BEFORE THE
MISSOURI ETHICS COMMISSION

Filed

OCT 30 2025

Missouri Ethics
Commission

MISSOURI ETHICS
COMMISSION,

Petitioner,

v.

BELIEVE IN LIFE AND
LIBERTY – BILL PAC,
Continuing Committee,

and

DEBBIE MCFARLAND,
Treasurer,

Respondents.

Case No. 24-0051-I

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

The Missouri Ethics Commission (“MEC”), together with Believe in Life and Liberty – BILL PAC and Debbie McFarland (“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. Believe in Life and Liberty – BILL PAC is a continuing committee registered with the MEC on January 29, 2019.
2. Debbie McFarland is listed as the committee's treasurer on the October 23, 2023, Amended Statement of Committee Organization.
3. Pursuant to § 105.961, the MEC's staff investigated a complaint filed with the Commission and reported the investigation findings to the Commission.
4. 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 Timely File a Report

5. On July 17, 2023, Respondents filed the July 2023 Quarterly Report, indicating they received a \$25,000 contribution from Simon Law Firm, LLC on June 30, 2023.

6. Respondents did not file the corresponding 48-hour Report of Contribution over \$5,000 until July 20, 2023.

7. Respondents were assessed a late fee of \$170 which was paid in full on October 14, 2023.

COUNT II

Failure to Accurately Report Contributions

8. Respondents reported receiving \$144,219.70 in anonymous contributions on their July 2023 Quarterly Report.

9. On June 18, 2024, Respondents amended their July 2023 Quarterly Report to correct reporting \$144,219.70 as anonymous contributions, when they were contributions received from individuals giving \$100 or less.

CONCLUSIONS OF LAW

COUNT I

Failure to Timely File a Report

10. Section 130.041 requires the candidate and/or treasurer or deputy treasurer of every committee to file disclosure reports of all receipts and expenditures, as prescribed in § 130.046.

11. Section 130.044 lists the timing for the filing of reports required by § 130.041, stating, in part:

1. All individuals and committees required to file disclosure reports under section 130.041 shall electronically report any contribution by any single contributor which exceeds five thousand dollars to the Missouri ethics commission within forty-eight hours of receiving the contribution.

12. Where Respondents received a contribution over \$5,000; where Respondents were required by § 130.044.1 to report contributions received over \$5,000 within 48-hours; and where Respondents failed to do so timely, there is probable cause to believe Respondents violated said section, empowering this Commission to act, as permitted under § 105.961.

COUNT II

Failure to Accurately Report Contributions

13. Section 130.041.1(3), RSMo requires committees to report receipts for each reporting period on all disclosure reports, requiring:

- (a) Total amount of all monetary contributions received which can be identified in the committee's records by name and address of each contributor. In addition, the candidate committee shall make a reasonable effort to obtain and report the employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received one or more contributions which in the aggregate total in excess of one hundred dollars ...

14. Where Respondents failed to correctly report \$144,219.70 as contributions received from individuals giving \$100 or less, there is probable cause to believe they violated § 103.041.1(3), 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 §§ 103.041.1(3) and 130.044.1, RSMo 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 \$2,000.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$200.00 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:

RESPONDENTS
BELIEVE IN LIFE AND LIBERTY –
BILL PAC and DEBBIE MCFARLAND

Debbie McFarland
Debbie McFarland
Date
10/21/25

MISSOURI ETHICS COMMISSION

Stacey Heislen 10/30/2025
Stacey Heislen
Executive Director
Date

Brian Hamilton 10/26/25
Brian Hamilton
Attorney for Petitioner
Date

Filed

NOV 06 2025

Petitioner,

V.

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and

DEBBIE MCFARLAND,
Treasurer,

Respondents.

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 103.041.1(3) and 130.044.1, RSMo and pursuant to § 105.961.4, hereby

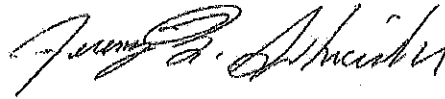
ORDERS:

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3. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$2,000.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$200.00 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.

SO ORDERED this 6th day of November 2025

A handwritten signature in cursive script, appearing to read "Jeremy B. Schneider".

Jeremy Schneider, Chair
Missouri Ethics Commission