

BEFORE THE
MISSOURI ETHICS COMMISSION

Filed

JAN 20 2026

Missouri Ethics
Commission

MISSOURI ETHICS
COMMISSION,

Petitioner,

v.

MISSOURIANS PROTECTING
CHILDREN AND FAMILIES,
Committee,

and

TOM ESTES,
Treasurer,

Respondents.

Case No. 24-0085-I

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

The Missouri Ethics Commission ("MEC"), together with Missourians Protecting Children and Families and Tom Estes ("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. Missourians Protecting Children and Families is a federal super PAC registered with the Federal Election Commission (FEC) on September 4, 2024.
2. Tom Estes was listed as the treasurer on Missourians Protecting Children and Families amended Statement of Organization filed with the FEC on September 14, 2024.
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.
5. A website domain operated by Missourians Protecting Children and Families, moprotects.org, was registered on August 20, 2024.

6. On its website, Missourians Protecting Children and Families solicits contributions. It's solicitation page states, "Make an impact today. Your contributions will help us defeat Amendment 3. Why give? All of your contributions will go directly towards defeating Amendment 3. We are 100% staffed by volunteers. Your giving will enable us to purchase yard signs of various sizes. We need 1,000 4x8 signs, 1,000 4x4 signs, and 25,000 small yard signs. Your generosity will allow us to develop and print the educational materials needed to educate the public on the dangers of Amendment 3."

7. Respondents received contributions totaling \$2,300 as of August 25, 2024, and made expenditures totaling \$1,353.44 as of June 14, 2022.

8. Respondents should have filed a Statement of Committee Organization with the Missouri Ethics Commission no later than September 15, 2024.

9. Respondent Tom Estes registered a continuing committee, MO Protect PAC, with the Missouri Ethics Commission on February 20, 2025, and listed himself as treasurer.

CONCLUSIONS OF LAW

10. Section 130.011(7) defines a committee as:

A person or any combination of persons, who accepts contributions or makes expenditures for the primary or incidental purpose of influencing or attempting to influence the action of voters for or against the nomination or election to public office of one or more candidates or the qualification, passage or defeat of any ballot measure or for the purpose of paying a previously incurred campaign debt or obligation of a candidate or the debts or obligations of a committee or for the purpose of contributing funds to another committee.

11. Pursuant to § 130.021.10,

A committee domiciled outside this state shall be required to file a statement of organization and appoint a treasurer residing in this state and open an account in a depository within this state; provided that either of the following conditions prevails:

- (1) The aggregate of all contributions received from persons domiciled in this state exceeds twenty percent in total dollar amount of all funds received by the committee in the preceding twelve months; or
- (2) The aggregate of all contributions and expenditures made to support or oppose candidates and ballot measures in this state exceeds one thousand five hundred dollars in the current calendar year.

12. Lastly, upon meeting the definition of a committee, §130.021(5) requires formation to be undertaken, stating, in relevant part:

any person or organization or group of persons which is a committee by virtue of the definitions of committee in section 130.011...shall file a statement of organization with the appropriate officer within twenty days after the person or organization becomes a committee but no later than the date for filing the first report required pursuant to the provisions of section 130.046.

13. Where Respondents opposed a Missouri ballot issue on the November 5, 2024, ballot; where Respondents exceeded \$1,500 in contributions received and expenditures made; and where Respondents failed to timely register a committee with the MEC within the time limits prescribed by § 130.021, there is probable cause to believe they violated §§ 130.011 & 130.021, 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 §§ 130.011 and 130.021, RSMo. 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 \$1,000, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$100 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.

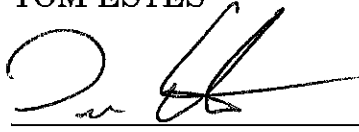
3. Each party agrees to pay all their own fees and expenses incurred as a result of this case, its litigation, and/or its disposition.

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.

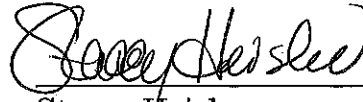
5. This agreement shall become effective immediately upon (1) the signature of all parties; (2) adoption of the Joint Proposed Findings of Fact,

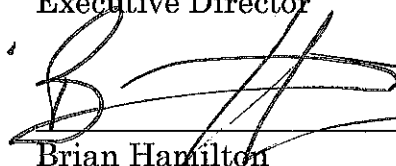
SO AGREED:

RESPONDENTS
MISSOURIANS PROTECTING
CHILDREN AND FAMILIES and
TOM ESTES


Tom Estes
1-10-26
Date

MISSOURI ETHICS COMMISSION


Stacey Heislen
Executive Director
1/20/26
Date


Brian Hamilton
Attorney for Petitioner
1/20/26
Date

Filed

Missouri Ethics
Commission

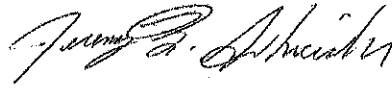
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CONSENT ORDER

- The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.011 and 130.021, RSMo. and pursuant to §105.961.4, hereby **ORDERS:**

4. Respondents shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 21st day of January 2026

A handwritten signature in cursive script, appearing to read "Jeremy Schneider", written in dark ink.

Jeremy Schneider, Chair
Missouri Ethics Commission