

BEFORE THE  
MISSOURI ETHICS COMMISSION

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 25-0028-I(B)
	)	
PROFESSIONAL FIREFIGHTERS OF	)	
TRI-COUNTY PAC,	)	
GARRETT RYAN, TREASURER	)	
	)	
Respondents.	)	

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

The Missouri Ethics Commission (“MEC”), together with Professional Firefighters of Tri-County PAC and its Treasurer, Garrett Ryan (“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 acknowledges they have received actual notice of the legal complaint filed by the MEC in this case, have reviewed the contents of the legal complaint, and submit to the jurisdiction of the Missouri Ethics Commission.

Respondents further acknowledges 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 enter 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. The Missouri Ethics Commission (MEC) is an agency of the State of Missouri established pursuant to Section 105.955, RSMo, in part for the purpose of enforcing provisions of Chapter 130.

2. Respondent Professional Firefighters of Tri-County PAC (PFTC PAC) is a political action committee that registered with the MEC on January 18, 2011.

3. Garret Ryan was the Treasurer of PFTC PAC at all times relevant to the matters addressed in this complaint.

4. Pursuant to §§ 105.957 and 105.961, RSMo, the MEC's staff received a complaint against Respondents. Upon investigation of the allegations, a report was presented to the Commission.

5. The Commission determined there was reasonable grounds to believe violations of Missouri statutes had occurred and authorized a hearing pursuant to § 105.961.3, RSMo.

#### COUNT I

##### *Failure to Timely Report Expenditures*

6. As relates to the April 2025 election, the reporting period for the 40 Day Before Report covered the period from January 1, 2025, through February 22, 2025, and the Report was due on or before February 27, 2025.

7. On February 12, 2025, Respondents incurred an expenditure of \$1,798.74 by placing an order for printed materials in support of Patrick Kilker, a candidate for public office in the April 8, 2025 election.

8. Respondents filed a 40 Day Before Report on February 26, 2025, but Respondents did not include this expenditure, even though the expenditure was incurred during the reporting period for that particular report.

9. Respondents filed an Amended 40 Day Before Report on February 28, 2025, but Respondents did not include this expenditure, even though the expenditure was incurred during the reporting period for that particular report.

10. As relates to the April 2025 election, the reporting period for the 8 Day Before Report covered the period from February 23, 2025, through March 27, 2025, and the Report was due on or before March 31, 2025.

11. Respondents incurred expenditures totaling \$2,946.48 in support of Patrick Kilker, a candidate for public office in the April 8, 2025 election, by ordering printed materials on: February 24, 2025; March 11, 2025; and March 24, 2025.

12. Respondents did not report these expenditures on an 8 Day Before Report even though the expenditures were incurred during the reporting period for that particular report.

13. Respondents reported these incurred expenditures on a 30 Day After Report that was filed on May 3, 2025.

14. Respondents did not include a Direct Expenditure Report with the 40 Day Before Report even though the expenditures in support of a candidate were incurred during the reporting period for that particular report.

15. Respondents did not include a Direct Expenditure Report with an 8 Day Before Report even though the expenditures in support of a candidate were incurred during the reporting period for that particular report.

16. Respondents included a Direct Expenditure Report with the 30 Day After Report that was filed on May 3, 2025.

## COUNT II

### *Failure to File Campaign Finance Disclosure Reports*

17. Respondents incurred expenditures in February and early March of 2025 by ordering printed materials in support of Patrick Kilker, a candidate for public office in the April 8, 2025 general election.

18. Respondents reported these expenditures on a 30 Day After Report.
19. Respondents did not file an 8 Day Before Report in March of 2025.

## CONCLUSIONS OF LAW

### COUNT I

#### *Failure to Timely Report Expenditures*

20. Section 130.041.1(4), RSMo, requires committees to include information pertaining to all expenditures in campaign finance disclosure reports.

21. An “expenditure” is “a payment, advance, conveyance, deposit, donation or contribution of money or anything of value for the purpose of supporting or opposing the nomination or election of any candidate for public office[.]” Section 130.011(17), RSMo.

22. An expenditure is “incurred” when the financial obligation for the expense first arises, even if the payment of the obligation occurs later. An incurred expenditure should be reported at the time it is incurred; the subsequent payment should be reported not as an expenditure but as payment of the outstanding obligation. See Advisory Opinion 2007.11.CF.013.

23. “If any committee accepts contributions or makes expenditures in support of or in opposition to a ballot measure or a candidate, and the [quarterly] report. . . is filed prior to the fortieth day before the election on the measure or candidate, the committee shall file an additional disclosure report not later than fortieth day before the election for the period closing on the forty-fifth day before the election.” Section 130.046.1(3), RSMo.

24. Committees are also required to file a campaign finance disclosure report “[n]ot later than the eighth day before an election for the period closing on the twelfth day before the election if the committee has made any contribution or expenditure either in support or opposition to any candidate or ballot measure[.]” Section 130.046.1(1), RSMo.

25. A Direct Expenditure Report that includes “[t]he amount of expenditures for or against a candidate . . . during the period covered and the cumulative amount of expenditures for or against that candidate. . . , with each candidate being listed by name, mailing address an office sought” must be included in included in campaign finance disclosure reports. Section 130.041.1(7), RSMo.

26. There is probable cause to believe Respondents violated §§ 130.041.1(4) and 130.041.1(7), RSMo, by failing to timely report expenditures on campaign finance disclosure reports.

## COUNT II

### *Failure to File Campaign Finance Disclosure Reports*

27. Campaign finance disclosure reports are required to be filed no “later than the eighth day before an election for the period closing on the twelfth day before the election if the committee has made any contribution or expenditure either in support or opposition to any candidate or ballot measure[.]” Section 130.046.1(1), RSMo.

28. There is probable cause to believe Respondents violated § 130.046.1(1), RSMo, by failing to file an 8 Day Before Report to disclose the expenditures made in support of a candidate incurred during that reporting period.

## 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 § 130.041.1(3), RSMo, and pursuant to § 105.961.4, RSMo, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130.
2. A fee is imposed against Respondents in the amount of \$5,745, pursuant to § 105.961.4(6), RSMo. However, if Respondents pay \$574 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.

The parties understand that the MEC will maintain this agreement as an open record of the Commission. This agreement does not bind the MEC or restrict the remedies available concerning any violations not expressly detailed here, including any future violations. Each party agrees to pay all their own fees and expenses incurred as a result of this case, its litigation, and/or its disposition.

Respondents, together with their heirs, assigns, agents, representatives and attorneys, do hereby waive, release, acquit and forever discharge the MEC, 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 § 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.

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

SO AGREED:

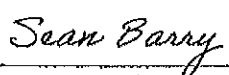
RESPONDENTS

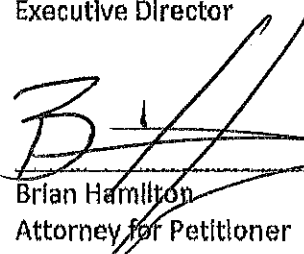
PETITIONER

PROFESSIONAL FIREFIGHTERS OF TRI-COUNTY, PAC,  
GARRETT RYAN, TREASURER

MISSOURI ETHICS COMMISSION

	5-11-2026		5/13/2026
Garrett Ryan	Date	Stacey Heisler	Date
		Executive Director	

  
Rick Barry / Sean C Barry  
Law Offices of Rick Barry, LLC  
Attorneys for Respondents

	5/13/2026
Brian Hamilton	Date
Attorney for Petitioner	

Filed

MAY 20 2026

Missouri Ethics  
Commission

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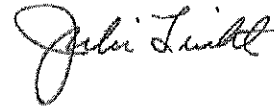
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4. Respondents shall be jointly and severally liable for all fees imposed under order.

SO ORDERED this 20th day of May 2026,

A handwritten signature in cursive script, appearing to read "Julie Leicht".

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Julie Leicht, Commission Chair  
Missouri Ethics Commission