

Filed

JUL 09 2026

Missouri Ethics
Commission

BEFORE THE
MISSOURI ETHICS COMMISSION

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 25-0061-I
	)	
AMERICAN JOBS & GROWTH PAC	)	
and DUSTIN MCINTYRE, Treasurer,	)	
	)	
Respondents.	)	

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

The Missouri Ethics Commission ("MEC"), together with the American Jobs & Growth PAC and its Treasurer, Dustin McIntyre ("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 legal complaint, and submit themselves 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 enter into this agreement and agree 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 § 105.955, RSMo, in part for the purpose of enforcing provisions of Chapter 130, RSMo.

2. The American Jobs & Growth PAC is registered with the Federal Election Commission (FEC) as a Super PAC (Independent Expenditure-Only).

3. Dustin McIntyre is the PAC's Treasurer.

4. Pursuant to §§ 105.957 and 105.961, RSMo, the MEC's staff investigated a complaint that was filed with the Commission and reported the investigation findings to the Commission.

5. The Commission determined there were reasonable grounds to believe violations of the law had occurred and authorized a hearing pursuant to § 105.961.3,

RSMo.

6. On November 4, 2025, voters in Jefferson City were presented with Proposition A, a ballot measure which asked:

Shall the City of Jefferson renew for an additional 25 years its current tax of seven percent (7%) on each sleeping room occupied and rented by transient guests of hotels and motels, as defined in City Code sec. 17-63, where the proceeds of which shall be expended for promotion of tourism?

7. Respondents made the following expenditures in support of or opposition to Proposition A:

Invoice Date	Payee	Description	Amount
10/15/2025	Axiom	Direct Mail – 01 Field of Bad Dreams 02 Bill, Quantity 03 Don't Take the Bait	\$14,511
10/17/2025	Remington Research Group	MMS Texts, Jeff City Tax Issue	\$2,100
10/17/2025	AX Media	Jeff City Streaming TV and Online Video	\$9,500
10/20/2025	The Political Firm	American Jobs And Growth PAC ad 1 x :30	\$4,200
10/28/2025	The Political Firm	American Jobs and Growth: TV Audio, "Jeff City" (BO)	\$720
10/29/2025	AX Media	Jeff City KWOS Radio	\$2,000
10/30/2025	Axiom	Newspaper Ad; 4x8 sign	\$300
10/31/2025	The Political Firm	American Jobs & Growth: "Field of Nightmares", Record Disclaimer, Edit and Mix (BO)	\$720
TOTAL			\$34,051

8. Respondents did not file a statement of committee organization with the Missouri Ethics Commission.

9. Respondents did not file any Out of State Committee Reports with the Missouri Ethics Commission.

CONCLUSIONS OF LAW

10. Pursuant to § 130.021.10, RSMo: "A committee domiciled outside this state shall be required to file a statement of committee organization and appoint a treasurer residing in this state and open an account in a depository within this state; provided 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.

11. An out of state committee that is not required to file a statement of committee organization pursuant to §130.021.10, RSMo, is nevertheless required to "file reports with the Missouri ethics commission. . . if the committee makes contributions or expenditures in support of or in opposition to candidates or ballot measures in this state[.]" Section 130.049, RSMo.

12. With respect to timing: "An initial report shall be filed no later than fourteen

days prior to the date such out-of-state committee first makes a contribution or expenditure in this state.” Section 130.049, RSMo.

13. There is probable cause to believe Respondents violated § 130.021.10, RSMo, by failing to file a statement of committee organization after making expenditures in excess of \$1,500 in support of or opposition to Proposition A or § 130.049, RSMo, by failing to file any Out of State Committee reports after making expenditures in support of or opposition to Proposition A.

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 § 130.021.10 or § 130.049, RSMo and pursuant to § 105.961.4, RSMo, hereby

ORDERS:

1. Respondents shall comply with all relevant sections of Chapter 130, RSMo.
2. A fee is imposed against Respondents in the amount of \$1,000; however, if Respondents pay \$100 within 45 days of the date of the consent order, the remainder of the fee will be stayed. Fee will be paid by check or money order made payable to the Missouri Ethics Commission
3. Respondents are jointly and severally liable for the payment of this fee.

4. Regardless of the stay in paragraph 2, if there is probable cause to believe that any Respondent has committed any further violation of the campaign finance laws in Chapter 130, RSMo, within the two-year period from the date of this order, then the Respondent who committed the new violation will be required to pay the remainder of the fee. That remainder will be due immediately upon final adjudication of finding probable cause.

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

AMERICAN JOBS & GROWTH PAC

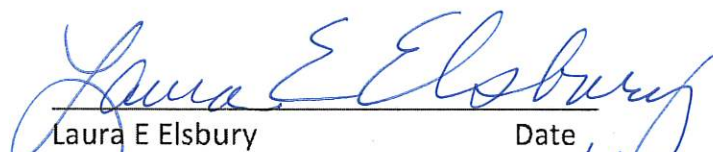
 7/8/2026
By Dustin McIntyre Date
Treasurer

DUSTIN MCINTYRE

 7/8/2026
Dustin McIntyre Date

PETITIONER

 7/9/2026
Stacey Heislen Date
Executive Director

 7/9/2026
Laura E Elsbury Date
Attorney for Petitioner

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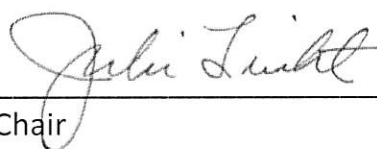
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SO ORDERED, this 13th day of July, 2026.



Julie Leicht, Chair
Missouri Ethics Commission