

Filed

JUL 14 2026

**Missouri Ethics
Commission**

**BEFORE THE
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 25-0052-I
	)	
MISSOURI VOTER PROJECT – STATE PAC,	)	
Continuing Committee, and	)	
MATTHEW S. MCBRIDE, Treasurer,	)	
	)	
Respondents.	)	

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

The Missouri Ethics Commission (“MEC”), together with the Missouri Voter Project – State PAC and its Treasurer, Matthew S. McBride (“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.
2. Respondent Missouri Voter Project – State PAC is a continuing committee that registered with the MEC on August 18, 2018.
3. Respondent Matthew S. McBride has been the Treasurer for the committee since January 19, 2024.
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.

6. In the 30 Day After General Election report filed on December 5, 2024, Respondents failed to include a “purpose” for two expenditures:

Name and Address of Recipient	Date	Amount this Period
GPS Impact 112 SE 4 th Street, Unit 202 Des Moines, IA 50309	10/30/2024	\$5,670.00
GPS Impact 112 SE 4 th Street, Unit 202 Des Moines, IA 50309	10/30/2024	\$34,553.00

7. Respondents have subsequently filed amended reports to address these omissions.

CONCLUSIONS OF LAW

8. Campaign finance disclosure reports must include information regarding contributions and expenditures. Section 130.041.1, RSMo.

9. Information pertaining to expenditures over \$100 must include “[t]he full name and mailing address of each person to whom an expenditure of money or any other thing of value in the amount of more than one hundred dollars has been made, contracted for or incurred, together with the date, amount and purpose of each expenditure.” Section 130.041.1(4)(e), RSMo.

10. There is probable cause to believe Respondents violated § 130.041.1(4)(e), RSMo, by failing to include information about the purpose of two expenditures.

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(4)(e), RSMo and pursuant to § 105.961.4(6), RSMo, hereby

ORDERS:

1. Respondents shall comply with all provisions 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.
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.
5. Fees will be paid by check or money order made payable to the Missouri Ethics Commission.

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

MISSOURI VOTER PROJECT – STATE PAC

MISSOURI ETHICS COMMISSION

MMB

07.13.2026

By Matthew S. McBride
Treasurer

Date

Stacey Heisten

7/13/2026

Stacey Heisten
Executive Director

Date

MATTHEW S. MCBRIDE

MMB

07.13.2026

Matthew S. McBride

Date

Laura E. Elsbury

Laura E. Elsbury
Attorney for Petitioner

Date

7-14-2026

MMB

07.13.2026

Matthew S. McBride

Date

Lashly & Baer, PC

Attorney for Respondents

Filed

JUL 16 2026

Missouri Ethics
Commission

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Case No. 25-0052-I

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5. Fees will be paid by check or money order made payable to the Missouri Ethics Commission.

SO ORDERED, this 16th day of July 2026.



Julie Leicht, Chair
Missouri Ethics Commission