

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

JUL 28 2026

Missouri Ethics
Commission

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 25-0047-I
	)	
WENTZVILLE SCHOOLS CAMPAIGN COMMITTEE	)	
and MATT REGAN, Treasurer,	)	
	)	
Respondents.	)	

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

The Missouri Ethics Commission ("MEC"), together with the Wentzville Schools Campaign Committee and its Treasurer, Matt Regan ("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. Wentzville Schools Campaign Committee is a political action committee that registered with the MEC on January 31, 2000.

3. Matt Regan has been the Treasurer since September 2, 2014.

4. Pursuant to §§ 105.957 and 105.961, RSMo, the MEC's staff investigated a complaint that had been 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, RSMo.

6. In a Statement of Committee Organization for the Wentzville Schools Campaign Committee filed on September 2, 2014, the Committee disclosed the following mailing address: PO Box 451 (Wentzville).

7. The Committee stopped using PO Box 451 in 2020.

8. Respondents failed to file an amended Statement of Committee Organization until October 7, 2025.

CONCLUSIONS OF LAW

9. Committees are required to file with the MEC a statement of organization that contains relevant information, including the following:

The name, mailing address and telephone number, if any, of the committee filing the statement of organization. If the committee is deemed to be affiliated with a connected organization as provided in subdivision (11) of section 130.011, the name of the connected organization, or a legally registered fictitious name which reasonably identifies the connected organization, shall appear in the name of the committee. If the committee is a candidate committee, the name of the candidate shall be a part of the committee's name[.]

Section 130.021.5(1), RSMo.

10. "A committee which has filed a statement of organization and has not terminated shall not be required to file another statement of organization, except that when there is a change in any of the information previously reported as required by subdivisions (1) to (8) of subsection 5 of this section an amended statement of organization shall be filed within twenty days after the change occurs, but no later than

the date of the filing of the next report required to be filed by that committee by section 130.046." Section 130.021.7, RSMo.

11. There is probable cause to believe Respondents violated § 130.021.7, RSMo, by failing to timely file an amended Statement of Committee Organization to reflect an accurate mailing address.

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., 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.
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.

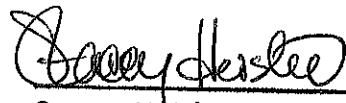
SO AGREED:

RESPONDENTS

PETITIONER

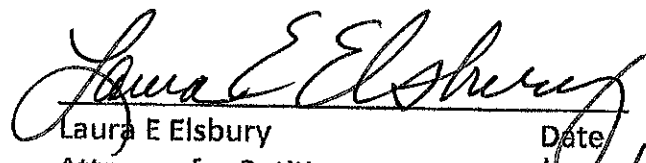
WENTZVILLE SCHOOLS CAMPAIGN
COMMITTEE


By Matt Regan 7-21-2026
Treasurer Date


Stacey Helslen 7/24/2026
Executive Director Date

MATT REGAN


Matt Regan 7-21-2026
Date


Laura E Elsbury Date
Attorney for Petitioner 7/28/2026

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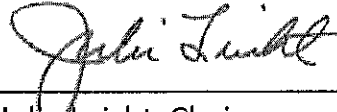
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5. Fees will be paid by check or money order made payable to the Missouri Ethics Commission.

SO ORDERED, this 4th day of August 2026.

A handwritten signature in cursive script, reading "Julie Leicht".

Julie Leicht, Chair
Missouri Ethics Commission