

Filed

AUG 27 2026

Missouri Ethics
Commission

BEFORE THE
MISSOURI ETHICS COMMISSION

MISSOURI ETHICS	)	
COMMISSION,	)	
	)	
Petitioner,	)	
v.	)	
	)	Case No. 24-0082-I
UNITING MISSOURI PAC,	)	
Continuing Committee,	)	
	)	
and	)	
	)	
TOM BURCHAM, Treasurer,	)	
	)	
Respondents.	)	

JOINT FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND ORDER

The Missouri Ethics Commission ("MEC"), together with Uniting Missouri PAC and Tom Burcham ("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. Uniting Missouri PAC is a continuing committee registered with the MEC on June 29, 2018

2. Charlotte Boyer was treasurer for Uniting Missouri PAC at the time of the expenditures discussed herein. Tom Burcham is the current Treasurer.

3. Pursuant to § 105.961, the Commission's staff investigated a complaint filed with the Commission and reported the findings to the Commission.

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

5. Respondents reported four (4) itemized expenditures totaling \$674,784.00 on three (3) 24-Hour Expenditure Reports.

Expenditure Name	Purpose	Date	Amount
Thompson Communication	Digital advertising	7/29/2024	\$597,424.00
Coefficient	Campaign Advertising	7/31/2024	\$40,610.90
Coefficient	Campaign Advertising	8/5/2024	\$35,500.00
FPI	TV Advertising	8/5/2024	\$1,250.00
Total			\$674,784.00

6. Respondents did not initially disclose the candidate or ballot measure supported or opposed by each of the four (4) itemized expenditures.

CONCLUSIONS OF LAW

7. Pursuant to Section 130.041.1(7), RSMo, "every committee... shall file a legibly printed or typed disclosure report of receipts and expenditures... each report shall set forth... the amount of expenditures for or against a candidate or ballot measure during the period covered and the cumulative amount of expenditures for or against that candidate or ballot measure, with each candidate being listed by name, mailing address and office sought."

8. Where Respondents made four (4) expenditures for the purpose of supporting or opposing a candidate or a ballot measure, and where they did not initially disclose the candidate or ballot measure supported or opposed by each of the four (4) itemized expenditures, there is probable cause to believe Respondents violated § 130.041.1(7), giving this Commission 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 §130.041.1(7), and pursuant to § 105.961.4, hereby **ORDERS**:

- A. Respondents shall comply with all relevant sections of Chapter 130.
- B. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$1,000.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$100.00 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.
- C. Regardless of the stay in Paragraph B 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.
- D. 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, Conclusions of Law by the Missouri Ethics Commission; and (3) issuance of a Final Order by the Commission, without any further action of the parties.

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SO AGREED:

RESPONDENTS

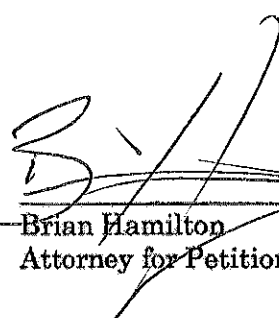
PETITIONER

UNITING MISSOURI PAC
TOM BURCHAM

MISSOURI ETHICS COMMISSION

	
Tom Burcham	Stacey Heislen
Date 8/26/26	Date 8/27/2026
	Executive Director

ATTORNEY FOR RESPONDENTS

	
Evan Kennedy	Brian Hamilton
Blitz, Bardgett, & Deutsch	Attorney for Petitioner
Date 8/26/26	Date 8/27/26

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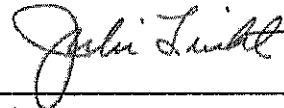
CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated §130.041.1(7), 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 \$1,000.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$100.00 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.

SO ORDERED, this 14th day of September, 2026.

A handwritten signature in cursive script, appearing to read "Julie Leicht", is positioned above a horizontal line.

Julie Leicht, Chair
Missouri Ethics Commission