



Senate Bill 152

Foreign Funding Restrictions

Ballot Measures

In 2025, the Missouri General Assembly passed Senate Bill 152, which added §§ 130.170 – 130.188, RSMo, restricting certain committees' ability to accept contributions from foreign nationals and prohibited sources (as defined in the law). The new law also imposes new reporting requirements on entities and committees making expenditures supporting or opposing a ballot measure. This law will take effect August 28, 2025, and will be enforced by the Missouri Attorney General's office.

Important definitions

Foreign national – § 130.170(3), RSMo

Any of the following:

- An individual who is not a citizen or lawful permanent resident of the United States of America;
- A government, or subdivision, of a foreign country or municipality thereof;
- A foreign political party;
- Any entity, such as a partnership, association, corporation, organization, or other combination of persons, that is organized under the laws of, or has its principal place of business in, a foreign country; or
- Any entity organized pursuant to the laws of the United States of America or any state thereof that is wholly or majority owned by a person or entity described above, unless:
 - Any contribution or expenditure it makes derives entirely from funds generated by the entity's United States operations; and
 - All decisions concerning the contribution or expenditure are made by individuals who are United States citizens or lawful permanent residents, except for setting overall budget amounts.

Prohibited sources – § 130.170(6), RSMo

Contributions from, or expenditures by, a foreign national made with the intent to use such funds to influence an election on a ballot measure.

Committee – § 130.170(1), RSMo

For the purposes of §§ 130.170 to 130.188, RSMo, the term 'committee' has the same meaning as provided in § 130.011, RSMo, with a key distinction:

Here, the term 'committee' does **NOT** include candidate committees.

Instead, for these sections, 'committee' refers to:

- Continuing committees (PACs)
 - Political party committees
 - Campaign (ballot issue) committees
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Impact on existing committees

Restrictions on contributions received

PACs, campaign (ballot measure) committees, and political party committees **shall not accept contributions from:**

- Foreign nationals (§ 130.176.2, RSMo); or
- Prohibited sources (§ 130.173.2, RSMo); or
- Contributors that have received more than \$10,000 in contributions from prohibited sources (monetary and in-kind contributions - § 130.176.2, RSMo) in the four years preceding the date of the contribution; or
- Contributors that received more than \$10,000 in funds from foreign nationals (in-kind contributions - § 130.176.5, RSMo) in the four years preceding the date of the contribution.

Collecting affirmation statements from contributors

§ 130.176.1, RSMo, requires PACs, campaign (ballot measure) committees, and political party committees to obtain affirmation statements from certain contributors. This provision only requires committees to collect affirmations from those contributing over \$2,000 and lays out separate affirmations for contributors who are individuals and contributors who are not individuals.

However, the required affirmation statements are insufficient to satisfy the committee's reporting requirements outlined in § 130.176.2, RSMo. This statute requires committees to attest on campaign finance reports that every contributor, regardless of amount contributed or whether the contributor is an individual, is not a foreign national and has not received contributions from prohibited sources aggregating over \$10,000 in the four-year period preceding the date of the contribution.

Therefore, the Missouri Ethics Commission recommends that committees collect this affirmation from every contributor, regardless of amount.

For your convenience, a [Contributor Information Card \(PDF\)](#) has been provided. It includes all the necessary details required to accurately complete your campaign finance disclosure reports.

Affirmations on campaign finance reports

Each full disclosure report filed by PACs, campaign (ballot measure) committees, and political party committees **must include** the following affirmation statements:

- An affirmation that the committee has not knowingly or willfully received, solicited, or accepted, directly or indirectly, contributions (received on or after August 28, 2025) from a prohibited source during the reporting period.
- An affirmation that the contributor associated with each contribution received (on or after August 28, 2025) during the reporting period is not a foreign national and has not knowingly or willfully received, solicited, or accepted, whether directly or indirectly, contributions from one or more prohibited sources aggregating over \$10,000 within the four-year period immediately preceding the date of each contribution.
- An affirmation from committees making expenditures supporting or opposing a ballot measure that the committee has not knowingly or willfully accepted funds, directly or indirectly, aggregating over \$10,000 from one or more prohibited sources in the four-year period immediately preceding the date each expenditure is made.

New 48 Hour Ballot Measure Expenditure Attestation

Any time a PAC, campaign committee, political party committee, or candidate committee makes an expenditure of any amount supporting or opposing a ballot measure, the committee must, within 48 hours, affirm to the Missouri Ethics Commission that it has not knowingly or willfully accepted funds, directly or indirectly, aggregating over \$10,000 from one or more prohibited sources within the four-year period immediately preceding the date the expenditure is made and that it will not do so through the remainder of the calendar year in which the ballot measure will appear on the ballot.

The new 48 Hour Ballot Measure Expenditure Attestation will be available to file in the electronic filing system beginning August 28, 2025.

Note for candidate committees: While many other provisions of SB 152 do not extend to candidate committees, if a candidate committee spends any money to support or oppose a ballot measure, it must file the 48 Hour Ballot Measure Expenditure Attestation.

Impact on future committees

Upon creating, forming, or registering a new PAC, campaign (ballot measure) committee, or political party committee, the treasurer will certify on the Statement of Committee Organization that no preliminary activity was funded by prohibited sources. Per § 130.170(7), RSMo, “preliminary activity” includes, but is not limited to, conducting a poll, drafting ballot measure language, conducting a focus group, making telephone calls, and travel.

Please note, a committee’s first campaign finance report will include any contributions received and expenditures made prior to registration. Therefore, anyone engaging in campaign finance activity (other than a candidate for public office) is advised to collect affirmations and abide by regulations for existing PACs, campaign (ballot measure) committees, and political party committees to satisfy all reporting requirements, in the event that committee registration is ultimately required.

Impact on those other than committees

Any person making expenditures supporting/opposing a ballot measure shall keep records of any contribution received or expenditure made for such purpose. These records must be retained for at least three years.

48 Hour Ballot Measure Expenditure Attestation

Starting August 28, 2025, within 48 hours of making an expenditure supporting or opposing a ballot measure, the entity making the expenditure must file the 48 Hour Ballot Measure Expenditure Attestation with the Missouri Ethics Commission. By filing this statement, the entity affirms that it has not accepted more than \$10,000 from prohibited sources in the four-year period immediately preceding the date the expenditure was made and that it will not do so through the remainder of the calendar year in which the ballot measure will appear on the ballot. If expenditures supporting or opposing a ballot measure exceed \$500, this attestation must be filed in addition to the Non-Committee Expenditure Report.

Restrictions for foreign nationals

A foreign national, as defined in § 130.170(3), RSMo:

- Shall not make an in-kind expenditure for the purpose of supporting or opposing any ballot measure.
 - May not direct, dictate, control, or directly or indirectly participate in the decision-making process of any person with regard to that person's activities to influence an election on a ballot measure, such as decisions concerning the making of contributions to influence an election on a ballot measure.
 - May not solicit, directly or indirectly, the making of a donation, contribution, or expenditure by another person to influence an election on a ballot measure.
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Lobbyists

Any lobbyist, as defined in § 105.470, RSMo, found to have violated the provisions of §§ 130.170 to 130.188, RSMo, may have their lobbyist registration revoked or suspended and may be enjoined from receiving compensation or making expenditures for lobbying.

IMPORTANT NOTE: Enforcement

Per § 130.188.2, RSMo, the Missouri Ethics Commission cannot investigate or enforce the provisions of §§ 130.170 – 130.185, RSMo. Per § 130.188, RSMo, the Missouri Attorney General's office has the authority to investigate and enforce these provisions.

If you suspect that a violation of §§ 130.170 – 130.188, RSMo, has occurred, **please contact the Missouri Attorney General's office.**

Contact For Assistance:

Suspected SB 152 Violations:

Missouri Attorney General's office

<https://ago.mo.gov/about-us/contact-us> | 573-751-3321

Compliance, Reporting, or Form Questions (including SB 152):

Missouri Ethics Commission

mec.mo.gov | helpdesk@mec.mo.gov | 573-751-2013