

May 28, 2026

The Hon. Catherine L. Hanaway  
Missouri Attorney General's Office  
Supreme Court Building  
207 W. High Street  
Jefferson City, Missouri 65102

Re: Supplemental Complaint Against American Civil Liberties Union Foundation (EIN: 13-6213516) and Stop the Ban (MECID: C253512) under Foreign Influence in Ballot Measures Act

Dear Attorney General Hanaway:

Americans for Public Trust (“APT”), a 501(c)(3) nonprofit that works to uncover and publicize foreign dark money, submits this Supplemental Complaint to the Office of the Missouri Attorney General (the “Office”) regarding potential violations of the Foreign Influence in Ballot Measures Act. APT filed its original complaint on May 27, 2026. In the very brief time since that filing, new information regarding the activities of the American Civil Liberties Union Foundation (“ACLU Foundation”) and Missouri ballot measure committee, Stop the Ban, has been disclosed.

In the original complaint APT alleged – and still maintains – that the ACLU Foundation is the recipient of foreign donations and, in light of this new disclosure, has now made at least \$2.5 million in contributions to Stop the Ban, in violation of §§ 130.170 – 130.188 RSMo.<sup>1</sup>

With this new influx of money, the ACLU Foundation and Stop the Ban have sent the clear message that they will deal with the legal consequences of pouring foreign money into Missouri’s ballot measure process after the conclusion of their campaign. It appears that both are knowingly and willfully defying Missouri’s recently enacted Foreign Influence in Ballot Measures Act. In light of this apparent defiance, we implore the Attorney General to quickly commence an investigation into the actions of these entities, and also consider seeking an injunction to prevent additional violations by the ACLU Foundation and Stop the Ban.

### **Factual Background**

On May 27, 2026, Stop the Ban filed a “48 Hour Report of Contribution Received Over \$5000.” The report discloses that the ACLU Foundation made a \$2,000,000 contribution on May 26, 2026.<sup>2</sup>

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<sup>1</sup> Americans for Public Trust, [Complaint to Missouri Attorney General](#) (filed May 27, 2026).

<sup>2</sup> Missouri Ethics Commission, Stop the Ban, [48 Hour Report of Contribution Received Over \\$5000](#) (filed May 27, 2026).

NAME OF COMMITTEE Stop the Ban		DATE 5/27/2026
<b>INSTRUCTIONS</b>		
<b>PURPOSE: The purpose of this form is to report within 48 hours the receipt of a single contribution of more than \$5,000.00 received from any single contributor. This information should also be included in the next full disclosure report filed by your committee. Required Pursuant To Section 130.044 RSMo.</b>		
1. NAME, ADDRESS AND OCCUPATION (LIST COMMITTEES FIRST)	2. DATE RECEIVED	3. AMOUNT RECEIVED (CHECK IF MONETARY OR IN-KIND)
NAME: American Civil Liberties Union ADDRESS: Foundation, Inc CITY/STATE: 125 Broad St EMPLOYER: New York, NY 10004 <input type="checkbox"/> COMMITTEE:	5/26/2026	\$ 2,000,000.0 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND

(Missouri Ethics Commission, Stop the Ban, [48 Hour Report of Contribution Received Over \\$5000](#) (filed May 27, 2026))

This additional \$2,000,000 brings the foreign-funded ACLU Foundation's total disclosed contributions to Stop the Ban to \$2.5 million.<sup>3</sup>

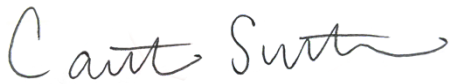
MECID	Committee Name	Report	Contributor Name/Address	Employer/Occupation	Contribution Date	Contribution Amount	Monetary/In-Kind	Committee
C253512	Stop the Ban	48 Hour Report of Contribution Received Over \$5000	American Civil Liberties Union Foundation, Inc. 125 Broad St New York NY 10004		03/09/2026	\$100,000.00	Monetary	No
C253512	Stop the Ban	48 Hour Report of Contribution Received Over \$5000	American Civil Liberties Union Foundation, Inc. 125 Broad St New York NY 10004		03/18/2026	\$400,000.00	Monetary	No
C253512	Stop the Ban	48 Hour Report of Contribution Received Over \$5000	American Civil Liberties Union Foundation, Inc 125 Broad St New York NY 10004		05/26/2026	\$2,000,000.00	Monetary	No

(Missouri Ethics Commission, Stop the Ban, [48 Hour Report of Contribution Received Over \\$5000-Cumulative](#) (filed May 27, 2026))

### Prayer for Relief

APT respectfully renews its request that the Attorney General commence an investigation pursuant to § 130.188 RSMo to determine whether, and to what extent, the ACLU Foundation and Stop the Ban are in violation of Missouri's Foreign Influence in Ballot Measures Act.

Respectfully Submitted,



Caitlin Sutherland, Executive Director  
Americans for Public Trust  
107 South West Street, Suite 442  
Alexandria, VA 22314

<sup>3</sup> Missouri Ethics Commission, Stop the Ban, [48 Hour Report of Contribution Received Over \\$5000-Cumulative](#) (filed May 27, 2026).