

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed
FEB 13 2025
Missouri Ethics
Commission

MISSOURI ETHICS)	
COMMISSION,)	
)	
Petitioner,)	
v.)	
)	Case No. 24-0048-I
SAINT JOSEPH SCHOOL)	
DISTRICT,)	
)	
and)	
)	
GABE EDGAR, Superintendent,)	
)	
Respondents.)	

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

The Missouri Ethics Commission (“MEC”), together with Saint Joseph School District and Gabe Edgar (“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. Saint Joseph School District (SJSJSD) is a public school district and a political subdivision of the state of Missouri.
2. At all times relevant, Gabe Edgar was the Superintendent of Saint Joseph School District.
3. Pursuant to § 105.961, the MEC's staff received a complaint against Respondents. Upon investigation of the allegations, a report was presented 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. On February 7, 2024, Respondent Edgar sent an email to all Saint Joseph School District staff members using his "Office of the Superintendent" sjsd.k12.mo.us email address which read, "We are forming a committee to support

the upcoming April bond issue, and we need your help! Your involvement could make a big difference.”

6. Between the dates of February 20, 2024, and March 6, 2024, Saint Joseph School District staff members used their sjds.k12.mo.us email addresses during regularly scheduled working hours to communicate about, and share documents from, committee meetings.

7. The sjds.k12.mo.us email address belongs to and is maintained by the Saint Joseph School District. The cost of maintaining a sjds.k12.mo.us email address is not zero.

CONCLUSIONS OF LAW

8. Missouri law restricts the conduct of school district employees using public funds for certain purposes, § 115.646 details this prohibition:

No contribution or expenditure of public funds shall be made directly by any officer, employee or agent of any political subdivision, including school districts and charter schools, to advocate, support, or oppose the passage or defeat of any ballot measure or the nomination or election of any candidate for public office, or to direct any public funds to, or pay any debts or obligations of, any committee supporting or opposing such ballot measures or candidates.

9. Where Respondent Edgar used his sjds.k12.mo.us email address to invite Saint Joseph School District staff members to join a committee to support a ballot measure on the April 2, 2024, ballot; where Saint Joseph School District staff members used their sjds.k12.mo.us email addresses during working hours to communicate regarding committee activities; and where the emails left no reasonable interpretation other than to support the April 2, 2024, ballot measure; there is

probable cause to believe Respondents violated § 115.646, RSMo, giving this Commission the power to act as permitted by § 105.961, RSMo.

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 § 115.646, RSMo. 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, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$100 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.

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.

SO AGREED:

RESPONDENTS SAINT JOSEPH
SCHOOL DISTRICT, GABE EDGAR

Gabe Edgar 2/11/25
Gabe Edgar Date

ATTORNEY FOR RESPONDENTS

Rachel Meystedt 2/11/25
Rachel Meystedt Date
EdCounsel LLC

MISSOURI ETHICS COMMISSION

Stacey Heislen 2/13/25
Stacey Heislen Date
Executive Director

Brian Hamilton 2/13/25
Brian Hamilton Date
Attorney for Petitioner

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4. Respondents shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 14th day of February, 2025

Robin Wheeler Sanders

Robin Wheeler Sanders, Chair
Missouri Ethics Commission