

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

SEP 09 2025

**Missouri Ethics
Commission**

MISSOURI ETHICS
COMMISSION,

Petitioner,

v.

BENJAMIN PEEBLES,
Candidate,

and

DOUGLAS COUNTIANS FOR
BEN PEEBLES,
Candidate Committee,

Respondents.

Case No. 22-0023-A

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

The Missouri Ethics Commission ("MEC"), together with Benjamin Peebles and Douglas Countians for Ben Peebles ("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. Ben Peebles was an unsuccessful candidate for Douglas County Sheriff in the August 4, 2020, primary election.
2. Douglas Countians for Ben Peebles is a candidate committee registered with the Missouri Ethics Commission on March 3, 2020.
3. Pursuant to Sections 105.959 and 105.961, RSMo, the Commission's staff audited the reports and statements filed with the Commission and reported the findings to the Commission.
4. Based on the audit report, the Commission determined that there were reasonable grounds to believe that violations of the law had occurred, and it therefore authorized a hearing in this matter pursuant to Section 105.961.3, RSMo.

COUNT I

Failure to timely amend the Statement of Committee Organization to reflect a change, failure to maintain an official depository account, and terminate committee.

Failure To Terminate Committee

5. Ben Peebles was an unsuccessful candidate for Douglas County Sheriff in the August 4, 2020, primary election.

6. By at least January 31, 2021, all committee debts were either repaid or forgiven.

7. Under the definition of candidate committee in § 130.011(9), where the committee was without debt, Respondents were required to terminate within thirty days of the general election or when all debts were either paid or forgiven.

8. The candidate committee, Douglas Countians for Ben Peebles, is still active.

Failure To Timely Report Change In Contact Information

9. The phone number on the Statement of Committee Organization for the candidate was disconnected.

10. Respondents did not amend their Statement of Committee Organization within twenty days of a change in telephone number.

Failure To Maintain an Official Depository Account

11. The committee's official depository account was closed January 31, 2021.

12. Respondents did not amend their Statement of Committee Organization within twenty days of a change in official depository account.

COUNT II

Failure to timely and accurately file campaign finance disclosure reports.

13. Respondents failed to timely file one full report and six Statements of Limited Activity.

Report Name	Report Year	Due Date	Date Filed
July Quarterly Report	2020	7/15/20	7/16/20
October Quarterly Report - Limited Activity	2020	10/15/20	11/8/21
April Quarterly Report - Limited Activity	2021	4/15/21	11/8/21
July Quarterly Report - Limited Activity	2021	7/15/21	11/8/21
October Quarterly Report - Limited Activity	2021	10/15/21	11/8/21
January Quarterly Report - Limited Activity	2022	1/17/22	7/6/22
April Quarterly Report - Limited Activity	2022	4/15/22	7/6/22

14. Respondents failed to file a 30 Day After Report for the 8/4/20 primary election and the 2022 October Quarterly Report.

COUNT III

Failure to timely and accurately report contributions.

15. Respondents failed to report a \$30.00 contribution received from Diane Peebles on August 3, 2020.

16. Respondents inaccurately reported a \$500 contribution dated April 23, 2020, from Congregation Echad.

COUNT IV

Failure to timely and accurately report expenditures.

17. Respondents failed to report seven non-itemized expenditures, totaling \$49.91, which included bank service charges and a late filing fee paid to the Missouri Ethics Commission.

Expenditure Name	Purpose	Amount	Date
Stockmens Bank	Maintenance fee	\$7.00	8/31/20
State of Missouri (MEC)	Late fee	\$10.00	7/28/20
Stockmens Bank	Maintenance fee	\$7.00	9/30/20

Stockmens Bank	Maintenance fee	\$7.00	10/31/20
Stockmens Bank	Maintenance fee	\$7.00	11/30/20
Stockmens Bank	Maintenance fee	\$7.00	12/31/20
Stockmens Bank	Maintenance fee	\$4.91	1/31/21
Total		\$49.91	

18. Respondents failed to report a \$135.00 expenditure to the Douglas County Herald for advertising July 27, 2020.

CONCLUSIONS OF LAW

COUNT I

Failure to timely amend the Statement of Committee Organization to reflect a change, failure to maintain an official depository account, and terminate committee.

Failure To Terminate Committee

19. Section 130.011(9) defines the limits of a candidate committee under Missouri's campaign finance, stating in part:

Candidate committee... shall terminate the later of either thirty days after the general election for a candidate who was not elected or upon the satisfaction of all committee debt after the election, except that no committee retiring debt shall engage in any other activities in support of the candidate for which the committee was formed[.]

20. Where Respondents was an unsuccessful candidate in the August 4, 2020, primary election, where the committee had no debt, and where Respondents failed to terminate, there is probable cause to believe Respondents violated § 130.011(9) giving this Commission the power to act as permitted under § 105.961.

Failure To Timely Report Change in Contact Information

21. "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." § 130.021.7, RSMo.

22. The statement of organization shall contain "The name, mailing address and telephone number, if any, of the committee filing the statement of organization." § 130.021.5(1), RSMo.

23. Where Respondents telephone number was disconnected but failed to amend their Statement of Committee Organization within twenty days of the change, there is probable cause to believe Respondents violated § 130.021.7 giving this Commission the power to act as permitted under § 105.961.

Failure To Maintain an Official Depository Account

24. Pursuant to Section 130.021.4(1), RSMo, "every committee shall have a single official fund depository within this state which shall be a federally or state-chartered bank, a federally or state-chartered savings and loan association, or a federally or state-chartered credit union in which the committee shall open and thereafter maintain at least one official depository account in its own name."

25. Where Respondents closed the committee's official depository account, but did not terminate the committee, there is probable cause to believe Respondents violated § 130.021.4(1) giving this Commission the power to act as permitted under § 105.961.

COUNT II

Failure to timely and accurately file campaign finance disclosure reports.

26. Pursuant to § 130.046.1, RSMo, all committees must file regular campaign finance disclosure reports at the following times and for the following periods:

(2) Not later than the thirtieth day after an election for a period closing on the twenty-fifth day after the election, if the committee has made any contribution or expenditure either in support of or opposition to any candidate or ballot measure; except that, a successful candidate who takes office prior to the twenty-fifth day after the election shall have complied with the report requirement of this subdivision if a disclosure report is filed by such candidate and any candidate committee under the candidate's control before such candidate takes office, and such report shall be for the period closing on the day before taking office; and

(3) Not later than the fifteenth day following the close of each calendar quarter[.]

27. Pursuant to § 130.146.5(2), RSMo,

No disclosure report needs to be filed for any reporting period if during that reporting period the committee has neither received contributions aggregating more than five hundred dollars nor made expenditure aggregating more than five hundred dollars and has not received contributions aggregating more than three hundred dollars from any single contributor and if the committee's treasurer files a statement with the appropriate officer that the committee has not exceeded the identified thresholds in the reporting period. Any contributions received or expenditures made which are not reported because this statement is filed in lieu of a disclosure report shall be included in the next disclosure report filed by the committee. This statement shall not be filed in lieu of the report for two or more consecutive disclosure periods if either the contributions received or expenditures made in the aggregate during those reporting periods exceed five hundred dollars.

28. Where Respondents untimely file one report and six statements of limited activity, and failed to file two reports, there is probable cause to believe

Respondents violated § 130.046, RSMo, giving this Commission the power to act as permitted under § 105.961.

COUNT III

Failure to timely and accurately report contributions.

29. All committees are required to report contributions for each reporting period, receipts for the period, including:

(a) Total amount of all monetary contributions received which can be identified in the committee's records by name and address of each contributor. In addition, the candidate committee shall make a reasonable effort to obtain and report the employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received one or more contributions which in the aggregate total in excess of one hundred dollars and shall make a reasonable effort to obtain and report a description of any contractual relationship over five hundred dollars between the contributor and the state if the candidate is seeking election to a state office or between the contributor and any political subdivision of the state if the candidate is seeking election to another political subdivision of the state;

...

(e) A separate listing by name and address and employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received contributions, in money or any other thing of value, aggregating more than one hundred dollars, together with the date and amount of each such contribution;

(f) A listing of each loan received by name and address of the lender and date and amount of the loan. For each loan of more than one hundred dollars, a separate statement shall be attached setting forth the name and address of the lender and each person liable directly, indirectly or contingently, and the date, amount and terms of the loan[.]

§ 130.041.1(3), RSMo.

30. Where Respondents failed to report one contribution and inaccurately reported one contribution, there is probable cause to believe Respondents violated §

130.041.1(3), RSMo, giving this Commission the power to act as permitted under § 105.961.

COUNT IV

Failure to timely and accurately report expenditures.

31. All committees are required to report expenditures for each reporting period, including:

(a) The total dollar amount of expenditures made by check drawn on the committee's depository;

(b) The total dollar amount of expenditures made in cash;

...

(d) The full name and mailing address of each person to whom an expenditure of money or any other thing of value in the amount of more than one hundred dollars has been made, contracted for or incurred, together with the date, amount and purpose of each expenditure. Expenditures of one hundred dollars or less may be grouped and listed by categories of expenditure showing the total dollar amount of expenditures in each category, except that the report shall contain an itemized listing of each payment made to campaign workers by name, address, date, amount and purpose of each payment and the aggregate amount paid to each such worker[.]

§ 130.041.1(4), RSMo.

32. Where Respondents failed to report eight expenditures totaling \$184.91, there is probable cause to believe Respondents violated § 130.041.1(4), RSMo, giving this Commission the 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 §§ 130.011(9), 130.021.4(1), 130.021.7, 130.041.1(3), 130.041.1(4), and 130.046, RSMo and pursuant to § 105.961.4, hereby **ORDERS**:

1. Prior to finalizing settlement, Respondents will be required to file and amend reports and statements with the Commission.
2. Respondents shall comply with all relevant sections of Chapter 130.
3. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$2,214.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$221.00 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.
4. Regardless of the stay in paragraph 3 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.
5. 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:

RESPONDENT BENJAMIN
PEEBLES

MISSOURI ETHICS COMMISSION

Benjamin Peebles 09/08/25 Benjamin Peebles Date
Stacey Heislen 9/9/25 Stacey Heislen Date
Executive Director

RESPONDENT DOUGLAS
COUNTAINS FOR BEN PEEBLES

Benjamin Peebles 09/08/25 Benjamin Peebles Date
Brian Hamilton 9/9/25 Brian Hamilton Date
Attorney for Petitioner

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BEN PEEBLES,)	
Candidate Committee,)	
)	
Respondents.)	

CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.011(9), 130.021.4(1), 130.021.7, 130.041.1(3), 130.041.1(4), and 130.046, RSMo and pursuant to § 105.961.4, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130.
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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 12th day of September 2025



Jeremy Schneider
Missouri Ethics Commission