

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

SEP 16 2025

**Missouri Ethics
Commission**

| | | |
|----------------------|---|--------------------|
| MISSOURI ETHICS |) | |
| COMMISSION, |) | |
| |) | |
| Petitioner, |) | |
| |) | |
| v. |) | |
| |) | |
| ALFRED MONTGOMERY |) | |
| Candidate, |) | Case No. 24-0069-I |
| |) | |
| and |) | |
| |) | |
| FRIENDS FOR ALFRED |) | |
| MONTGOMERY, |) | |
| Candidate Committee, |) | |
| |) | |
| Respondents. |) | |

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

The Missouri Ethics Commission ("MEC"), together with Alfred Montgomery and Friends for Alfred Montgomery ("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. Alfred Montgomery was a successful candidate for St. Louis City Sheriff in the August 6, 2024, primary election.
2. Friends for Alfred Montgomery is a candidate committee registered with the MEC on or about February 27, 2023.
3. Pursuant to § 105.961, the MEC's staff investigated a complaint filed with the Commission and reported the investigation findings to the Commission.
4. The Commission determined there were reasonable grounds to believe a violation of the law had occurred and authorized a hearing pursuant to § 105.961.3.
5. Respondents maintained campaign headquarters at 1009 Locust St., St. Louis, MO 63101, owned by GST Properties, LLC.

6. Respondents have a lease agreement with GST Properties, LLC for 1009 Locust St. beginning May 1, 2024, and terminating on August 7, 2024, with a monthly rent of \$825 due on the first day of each month.

7. Respondents reported receiving an in-kind contribution of \$825 on May 1, 2024, from GST Properties, LLC on their July 2024 Quarterly Report filed on July 14, 2024.

8. Respondents failed to report an in-kind contribution received from GST Properties, LLC on June 1, 2024, in the amount of \$825 on their July 2024 Quarterly Report filed on July 14, 2024, it was not reported until Respondents filed an Amended July 2024 Quarterly Report on July 28, 2024.

9. The expense of rent for June 2024, an expense Respondents would have incurred in full otherwise, is something of value given from GST Properties, LLC.

CONCLUSIONS OF LAW

10. Section 130.011(12) defines a contribution to include anything of value for the purpose of supporting the election of a candidate for office.

11. Pursuant to § 130.011(19) a contribution in a form other than money is an in-kind contribution.

12. Section 130.041.1(9), sets forth the requirements for committees to report receipts for each reporting period on all disclosure reports:

A separate listing by full name and address of any committee, including a candidate committee controlled by the same candidate from which a transfer of funds or a contribution in any amount has been received during the reporting period, together with the date and amount of each such transfer or contribution[.]

13. Section 130.041.1(3)(d) requires committees to report receipts for the "total value of all in-kind contributions received."

14. Where Respondents received one (1) contribution of something of value from GST Properties, LLC and failed to report the in-kind contribution received, there is probable cause to believe Respondents violated §§ 130.041.1(9) and 130.041.1(3)(d), 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(9) and 130.041.1(3)(d), 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 ALFRED
MONTGOMERY, FRIENDS FOR
ALFRED MONTGOMERY

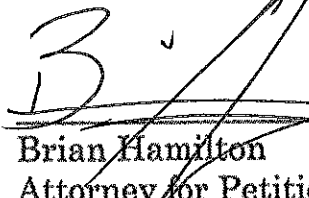

Alfred Montgomery 9/10/25
Date

ATTORNEY FOR RESPONDENTS


Blake M. Lawrence 9/10/25
Date

MISSOURI ETHICS COMMISSION


Stacey Heislen 9/16/25
Executive Director Date


Brian Hamilton 9/16/25
Attorney for Petitioner Date

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

SEP 19 2025

Missouri Ethics
Commission

MISSOURI ETHICS
COMMISSION,

Petitioner,

v.

ALFRED MONTGOMERY
Candidate,

and

FRIENDS FOR ALFRED
MONTGOMERY,
Candidate Committee,

Respondents.

Case No. 24-0069-I

CONSENT ORDER

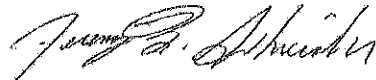
The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.041.1(9) and 130.041.1(3)(d), RSMo. and pursuant to §105.961.4, hereby **ORDERS**:

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.

SO ORDERED this 19th day of September 2025

A handwritten signature in cursive script, appearing to read "Jeremy B. Schneider".

Jeremy Schneider
Missouri Ethics Commission