

BEFORE THE
MISSOURI ETHICS COMMISSION

Filed

NOV 18 2025

Missouri Ethics
Commission

MISSOURI ETHICS
COMMISSION,

Petitioner,

v.

Case No. 22-0077-I

SPRINGFIELD UNITED,
Continuing Committee,

and

BRETT ADAMS, Treasurer,

Respondents.

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

The Missouri Ethics Commission ("MEC"), together with Brett Adams and Springfield United ("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. Springfield United is a continuing committee registered with the MEC on September 22, 2022
2. Brett Adams was treasurer for Springfield United.
3. Pursuant to § 105.961, the Commission's staff investigated a complaint filed with the Commission and reported the findings 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.

Count I – Acceptance of Unregistered LLC Contribution

5. Respondents indicated they received a contribution from Hawkins and Sons Construction, LLC on October 26, 2022, in the amount of \$500 on their 8 Day Before November 8, 2022 General Election report filed on October 28, 2022.

6. Hawkins and Sons Construction, LLC is not classified as a corporation under the federal tax code.

7. As of October 26, 2022, Hawkins and Sons Construction, LLC was not registered with MEC as required by § 130.029.4.

Count II - Failure to Accurately and Timely File Reports

8. Respondents made expenditures during the time periods described in § 130.046.1(2), 30 Day After November 8, 2022 General Election Report.

9. Respondents failed to file their 30 Day After November 8, 2022 General Election Report.

10. Respondents filed their October 2022 Quarterly Report on October 20, 2022, three (3) days beyond the deadline.

Count III – Failure to Accurately Report Expenditures

Failure to File Direct Expenditure Forms

11. Respondents made eight (8) expenditures in support of City of Springfield Ballot Question 1 for the November 8, 2022 election totaling \$32,322.90. A list of these expenditures is included as Figure A.

Figure A - Expenditures				
Expenditure Name	Purpose	Amount	Date	Report Not Included
Alpha Electoral Strategies, LLC	50 4x4 Campaign Signs	\$2,698.10	09/28/22	8-Day
Alpha Electoral Strategies, LLC	250 16x26 Yard Signs	\$1,264.40	10/05/22	8-Day
Alpha Electoral Strategies, LLC	Public Opinion Polling	\$13,500	10/11/22	8-Day
Alpha Electoral Strategies, LLC	Video Production	\$6,000	10/12/22	8-Day
Alpha Electoral Strategies, LLC	250 16x26 Yard Signs	\$1,264.40	10/20/2022	8-Day
Alpha Electoral Strategies, LLC	Flyers	\$1,200	11/01/22	30-Day
Alpha Electoral Strategies, LLC	Newspaper Advertisements	\$1,396	11/02/22	30-Day
Alpha Electoral Strategies, LLC	Facebook Advertisements	\$5,000	11/19/22	30-Day

12. Respondents did not file Direct Expenditure Reports for eight (8) expenditures made in support of City of Springfield Ballot Question 1 for the November 8, 2022 election.

Failure to file Independent Contractor Forms

13. On eight (8) separate occasions, totaling \$32,322.90, Respondents made expenditures to a political consulting firm.

14. Figure A details eight (8) expenditures required to be reported by Respondents under § 130.041.4, and with what report they should have been included.

15. Respondents failed to file an Independent Contractor form for five (5) expenditures totaling \$24,726.90 on the 8 Day After Election Report for the November 8, 2022 primary election.

16. Respondents failed to file an Independent Contractor form for three (3) expenditures totaling \$7,596 on the 30 Day After Election Report for the November 8, 2022 primary election.

CONCLUSIONS OF LAW

Count I – Acceptance of Unregistered LLC Contribution

17. Section 130.029.4 allows for a committee to accept a contribution from a limited liability company (LLC), when:

4. (1) Any limited liability company that is duly registered pursuant to chapter 347 and that has not elected to be classified as a corporation under the federal tax code may make contributions to any committee if the limited liability company has:

(a) Been in existence for at least one year prior to such contribution; and

(b) Electronically filed with the Missouri ethics commission indicating that the limited liability company is a legitimate business with a legitimate business interest and is not created for the sole purpose of making campaign contributions.

18. Section 130.036.2 defines when a contribution is considered to have been accepted:

Unless a contribution is rejected by the candidate or committee and returned to the donor or transmitted to the state treasurer within ten business days after its receipt, it shall be considered received and accepted on the date received, notwithstanding the fact that it was not deposited by the closing date of a reporting period.

19. Where Respondents accepted a \$500 contribution from Hawkins and Sons Construction, LLC on October 26, 2022; and failed to return the contribution within ten (10) business days; there is probable cause to believe Respondents violated § 130.029.4 giving this Commission the power to act as permitted by § 105.961.

Count II - Failure to Accurately and Timely File Reports

20. Section 130.041 requires the candidate and/or treasurer or deputy treasurer of every committee to file disclosure reports of all receipts and expenditures, as prescribed in § 130.046.

21. Section 130.046 lists the timing for the filing of reports required by § 130.041, stating, in part:

1. The disclosure reports required by section 130.041 for all committees shall be filed 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.

22. Where Respondents failed to file one (1) report and filed one (1) report late, there is probable cause to believe Respondent's violated §§ 130.041 and 130.046, empowering this Commission to act, as permitted under § 105.961.

Count III – Failure to Accurately Report Expenditures

23. Section 130.041.1(4), RSMo, details what is required of committees in disclosure reports, including:

- (4) Expenditures for the 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;
 - (c) The total dollar value of all in-kind expenditures made;
 - (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[.]

Failure to File Direct Expenditure Forms

24. Pursuant to § 130.041.1(7), RSMo, continuing committees are required to report, "the amount of expenditures for or against a candidate or ballot measure during the period covered and the cumulative amount of expenditures for or against that candidate or ballot measure, with each candidate being listed by name, mailing address and office sought."

25. Where Respondent made expenditures for the purpose of supporting a ballot measure, and where said expenditures were not reported on the appropriate forms, there is probable cause to believe Respondents violated § 130.041.1(7), giving this Commission power to act, as permitted under § 105.961.

Failure to file Independent Contractor Forms

26. Section 130.041 details the requirements that reporting of consulting services be done in specific manner, stating, in relevant part:

4. The words "consulting or consulting services, fees, or expenses", or similar words, shall not be used to describe the purpose of a payment as required in this section. The

reporting of any payment to such an independent contractor shall be on a form supplied by the appropriate officer, established by the ethics commission and shall include identification of the specific service or services provided including, but not limited to, public opinion polling, research on issues or opposition background, print or broadcast media production, print or broadcast media purchase, computer programming or data entry, direct mail production, postage, rent, utilities, phone solicitation, or fund raising, and the dollar amount prorated for each service.

27. Where Respondent made eight (8) expenditures to a political consulting firm, and where said expenditures were not reported on the required Independent Contractor forms, there is probable cause to believe Respondent's violated § 130.041.4, 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 §§ 130.029.4, 130.041, and 130.046, 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 \$2,500.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$700.00 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 of 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 SPRINGFIELD
UNITED and BRETT ADAMS

B. Adams 11/12/25
Brett Adams Date

ATTORNEY FOR RESPONDENTS

/s/ Bryan D. Fisher 11/12/2025
Bryan D. Fisher Date
Neal and Newman

MISSOURI ETHICS COMMISSION

Stacey Heislen 11/18/25
Stacey Heislen Date
Executive Director

B. Hamilton 11/18/25
Brian Hamilton Date
Attorney for Petitioner

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CONSENT ORDER

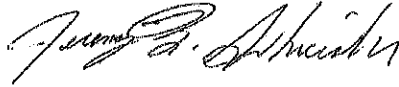
The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.029.4, 130.041, and 130.046, and pursuant to § 105.961.4, hereby

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 \$2,500.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$700.00 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.
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 21st day of November 2025.

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

Jeremy Schneider, Chair
Missouri Ethics Commission