

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

NOV 18 2025

**Missouri Ethics
Commission**

MISSOURI ETHICS	)	
COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	
	)	
MISSOURI CONSERVATIVES	)	
FOR TRUTH,	)	Case No. 23-0005-A
Continuing Committee,	)	
	)	
and	)	
	)	
BRETT ADAMS, Treasurer,	)	
	)	
Respondents.	)	

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

The Missouri Ethics Commission ("MEC"), together with Missouri Conservatives for Truth and Brett Adams ("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. Missouri Conservatives for Truth is a continuing committee established with the MEC on June 3, 2022.
2. Brett Adams has been the treasurer since the committee's inception.
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 1

Failure To Maintain an Official Depository Account and Amend Statement of Committee Organization

5. The address for Brett Adams on the Statement of Committee Organization was not the current address at 1408 N. Rockingham. The Statement of Committee Organization has not been amended with a new address.

6. The Statement of Committee Organization filed by Respondents on June 3, 2022, shows a committee bank account at US Bank. There was no bank account with the given number or in the name of the committee at US Bank.

7. On July 6, 2022, a bank account in the name of the committee was opened at OakStar Bank. The Statement of Committee Organization has not been amended with this bank and account information.

8. From June 3, 2022, through July 5, 2022, the committee did not have an official depository account.

COUNT II

Failure to accurately report beginning money on hand.

9. The beginning money on hand was inaccurately stated on the 2022 October Quarterly Report.

COUNT III

Failure to timely file campaign finance disclosure reports.

10. Respondents failed to timely file the 2022 July Quarterly Report, October Quarterly Report and the 30 Day After Report for the 8/2/22 primary election, as well as a Statement of Limited Activity in lieu of the 2023 April Quarterly Report.

11. Respondents failed to file the 8 Day Before Report for the 8/2/22 primary election to report expenditures to Alpha Electoral Strategies, totaling \$51,507.78, that were incurred on or about July 20, 2022.

12. Respondents entered an incorrect start date on the 2022 October Quarterly Report and included a \$51,507.78 expenditure made on July 28, 2022, which occurred prior to the actual start date of the reporting period (August 28, 2022). The payment should have been reported on the 30 Day After Report for the 8/2/22 primary election.

COUNT IV

Failure to timely and accurately report contributions.

13. Respondents failed to timely report a \$1,000.00 contribution received on November 1, 2022.

COUNT V

Failure to timely and accurately report expenditures.

14. Respondents failed to accurately report eight incurred expenditures, totaling \$51,507.78, to Alpha Electoral Strategies, for various services related to strategy, media, and the design, printing and delivery of mailers supporting various senatorial candidates. All invoices were dated July 20, 2022, but the expenditures were not reported as incurred on the 8 Day Before Report for the 8/2/22 primary election - only on the 30 Day After Report and 2022 Amended October Quarterly Report showing the expenditures paid on July 28, 2022.

15. Respondents failed to timely report a \$150.50 payment to the Missouri Ethics Commission for the late filing of the 30 Day After Report for the 8/2/22 primary election.

16. On the Direct Expenditure Report filed with the 30 Day After Report for the 8/2/22 primary election, an \$8,868.68 payment made to Alpha Electoral Strategies for mailers to support Curtis Trent, a senatorial candidate, was incorrectly reported as \$8,668.68.

CONCLUSIONS OF LAW

COUNT 1

Failure To Maintain an Official Depository Account and Amend Statement of Committee Organization

17. 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.”

18. The statement of organization shall contain “the name, mailing address and telephone number of the committee treasurer, and the name, mailing address and telephone number of its deputy treasurer if the committee has named a deputy treasurer[.]” § 130.021.5(3), RSMo.

19. The statement of organization shall contain “the name and mailing address of its depository, and the name and account number of each account the committee has in the depository.” § 130.021.5(6), RSMo.

20. "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.

21. Where Respondents failed to amend the Statement of Committee Organization to reflect changes in treasurer address and bank account and failed to maintain a committee bank account for approximately thirty-two days, there is probable cause to believe Respondents violated § 130.021 giving this Commission the power to act as permitted under § 105.961.

COUNT II

Failure to accurately report beginning money on hand.

22. Reports shall state "[t]he amount of money, including cash on hand at the beginning of the reporting period [.]" § 130.041.1(2), RSMo.

23. Where Respondents failed to accurately report the beginning money on hand on the 2022 October Quarterly Report, there is probable cause to believe Respondents violated § 130.041.1(2), RSMo giving this Commission the power to act as permitted under § 105.961.

COUNT III

Failure to timely file campaign finance disclosure reports.

24. Pursuant to Section 130.046.1, RSMo, all committees must file regular campaign finance disclosure reports at the following times:

(1) Not later than the eighth day before an election for the period closing on the twelfth day before the election if the committee has made any contribution or expenditure either in support or opposition to any candidate or ballot measure;

(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.

25. Pursuant to Section 130.046.5(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.

26. Where Respondents untimely filed four reports, and failed to file one report, and failed to file within proper periods, there is probable cause to believe Respondents violated § 130.046, giving this Commission the power to act as permitted under § 105.961.

COUNT IV

Failure to timely and accurately report contributions.

27. 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[.]

§ 130.041.1(3), RSMo.

28. Where Respondents failed to time report a \$1,000 contribution, there is probable cause to believe Respondents violated § 130.041.1(3), giving this Commission the power to act as permitted under § 105.961.

COUNT V

Failure to timely and accurately report expenditures.

29. 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.

30. Where Respondents failed to time report a \$150.50 payment and failed to accurately report eight incurred expenditures, there is probable cause to believe Respondents violated § 130.041.1(4), 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 §§ 130.021, 130.041.1(2)-(4), and 130.046, 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 \$4,000, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$400 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
MISSOURI CONSERVATIVES FOR
TRUTH and BRETT ADAMS

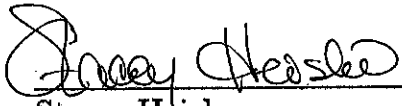

Brett Adams 11/12/25
Date

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
Executive Director Date


Brian Hamilton 11/18/25
Attorney for Petitioner Date

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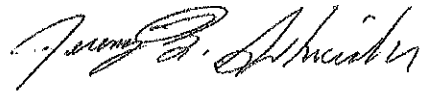
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4. Respondents shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 21st day of November 2025.

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

Jeremy Schneider, Chair
Missouri Ethics Commission