

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

DEC 19 2025

**Missouri Ethics
Commission**

MISSOURI ETHICS)	
COMMISSION,)	
)	
Petitioner,)	
)	
v.)	
)	
JEFFERY HILL FOR ST. LOUIS,)	Case No. 22-0018-A
Candidate Committee,)	
)	
and)	
)	
JEFFERY W. HILL JR,)	
Candidate,)	
)	
Respondents.)	

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER

This is the Decision and Order of the Missouri Ethics Commission following a hearing on a Complaint filed by Petitioner, by and through counsel, pursuant to § 105.961, RSMo, and Chapter 536, RSMo. The hearing was conducted before the following members of the Missouri Ethics Commission: Commission Chair Jeremy Schneider, Commissioner Ken McClure, Commissioner Julie Leicht, Commissioner Melinda K. Robertson, Commissioner Brandon Boulware, and Commissioner Stephanie L. Dooley.

The Commission held the closed hearing on December 19, 2025. The Commission was represented by General Counsel Brian Hamilton. Respondents did not appear after due notice.

The issues to be decided by the Missouri Ethics Commission at this hearing were whether there was probable cause to believe Respondents violated §§ 130.011(9), 130.021, 130.031.2, 130.041.1, and 130.046, RSMo.

Having considered all the competent and substantial evidence upon the whole record on the issue within the Commission's jurisdiction, the Commission finds by a unanimous vote as follows:

FINDINGS OF FACT

1. Respondent Hill was an unsuccessful candidate for Alderman of the 18th Ward in St. Louis, MO in the March 5, 2019, primary municipal election.
2. Respondent Hill's candidate committee, Jeffery Hill for St. Louis, was established on November 16, 2018.

COUNT 1

Failure To Terminate Committee

3. Respondent Hill was not a successful candidate in the March 5, 2019, election. Having reported no debt, Jeffery Hill for St. Louis should have terminated within 30 days from the general election.
4. The municipal general election for St. Louis, MO was April 2, 2019.
5. 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 by May 2, 2019.
6. Respondents did not terminate by May 2, 2019.

Failure To Maintain an Official Depository Account

7. The committee's official depository account was closed on August 26, 2019.

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

COUNT II

Cash expenditures in excess of limits.

9. On or about December 3, 2018, an ATM withdrawal of \$500.00 was made from the committee's account. The January 2019 Quarterly stated the \$500.00 was used to make a payment on a loan made to the committee from the candidate.

10. On or about March 18, 2019, an ATM withdrawal of \$700.00 was made. The money was used to make a payment on a loan.

11. On or about May 21, 2019, a withdrawal of \$138.37 was made from the committee's account.

COUNT III

Failure to accurately report beginning and ending money on hand and indebtedness.

12. Respondents failed to accurately report the beginning money on hand for the following reports: 40 Day Before 3/6/19 Election, 15 Day After Caucus Nomination, 8 Day Before 3/5/19 Election, 30 Day After 3/5/19 Election, and the April 2019 Quarterly.

13. Respondents failed to accurately report the ending money on hand for the following reports: January 2019 Quarterly, 40 Day Before 3/5/19 Election, 15 Day

After Caucus Nomination, 8 Day Before 3/6/19 Election, 30 Day After 3/5/19 Election, and the April 2019 Quarterly.

14. At the close of the January 2019 Quarterly report, Respondents reported having \$500.00 in indebtedness. This is incorrect as there was a payment in full on December 3, 2018, for the loans received on November 16, 2018 and November 26, 2018.

COUNT IV

Failure to timely file campaign finance disclosure reports.

15. Respondents were four (4) days late in filing the April 2019 Quarterly that was due on April 15, 2019.

16. Respondents failed to timely file thirteen (13) reports and/or statements of limited activity.

Report Name	Report Year	Due Date
July Quarterly Report	2019	7/15/19
October Quarterly Report	2019	10/15/19
January Quarterly Report	2020	1/15/20
April Quarterly Report	2020	4/15/20
July Quarterly Report	2020	7/15/20
October Quarterly Report	2020	10/15/20
April Quarterly Report	2021	4/15/21
July Quarterly Report	2021	7/15/21
October Quarterly Report	2021	10/15/21
January Quarterly Report	2022	1/15/22
April Quarterly Report	2022	4/15/22
July Quarterly Report	2022	7/15/22
October Quarterly Report	2022	10/15/22

COUNT V

Failure to timely and accurately report contributions.

17. Respondents failed to report five (5) contributions totaling \$275.00.

Contributor Name	Amount	Date	Report Not Showing Contribution
Karen Buckley	\$25.00	1/31/19	40 Day Before 3/5/19
Young Democrats of Greater St. Louis	\$25.00	3/31/19	30 Day After 3/5/19
Unknown- Act Blue Check	\$15.00	3/31/19	30 Day After 3/5/19
Unknown- Act Blue Check	\$10.00	4/30/19	April 2019 Quarterly
Zachary Chasnoff	\$200.00	1/31/19	40 Day Before 3/5/19
Total	\$275.00		

18. Respondents failed to report a \$7.00 branch fee that was returned on January 14, 2019.

19. Respondents inaccurately reported nine (9) contributions.

COUNT VI

Failure to timely and accurately report expenditures.

20. Respondents failed to report seventeen (17) expenditures totaling \$155.24 for ActBlue Missouri fees.

21. Respondents inaccurately reported three (3) expenditures.

CONCLUSIONS OF LAW

COUNT 1

Failure To Terminate Committee

22. 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[.]

23. Where Respondents was an unsuccessful candidate in the March 5, 2019, primary election, where the committee had no debt, and where Respondents failed to terminate by May 2, 2019, 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 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. "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.

26. 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

27. Where Respondents closed the committee's official depository account, but did not amend or terminate the committee, there is probable cause to believe Respondents violated §§ 130.021.4(1) and 130.021.5(6) giving this Commission the power to act as permitted under § 105.961.

COUNT II

Cash expenditures in excess of limits.

28. "Each expenditure of more than fifty dollars, except an in-kind expenditure, shall be made by check drawn on the committee's depository and signed by the committee treasurer, deputy treasurer or candidate. A single expenditure from a petty cash fund shall not exceed fifty dollars." § 130.031.2, RSMo.

29. Where Respondents made three (3) cash withdrawals over \$50 each, there is probable cause to believe Respondents violated § 130.031.2 giving this Commission the power to act as permitted under § 105.961.

COUNT III

Failure to accurately report beginning and ending money on hand and indebtedness.

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

31. Reports shall state "[t]he total amount of cash on hand as of the closing date of the reporting period covered, including amounts in depository accounts and in petty cash fund[.]" § 130.041.1(5), RSMo.

32. Reports shall state "The total amount of outstanding indebtedness as of the closing date of the reporting period covered." § 130.041.1(6), RSMo.

33. Where Respondents failed to accurately report the beginning and ending money on hand and indebtedness on several reports in 2019, there is probable cause to believe Respondents violated §§ 130.041.1(2), 130.041.1(5), and 130.041.1(6), RSMo giving this Commission the power to act as permitted under § 105.961.

COUNT IV

Failure to timely file campaign finance disclosure reports.

34. Pursuant to Section 130.046.1(3), RSMo, all committees must file regular campaign finance disclosure reports not later than the fifteenth day following the close of each calendar quarter.

35. 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.

36. Where Respondents untimely filed one (1) report and failed to timely file thirteen (13) reports and/or statements of limited activity, there is probable cause to

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

COUNT V

Failure to timely and accurately report contributions.

37. 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.

38. Where Respondents failed to report five (5) contributions and inaccurately reported nine contributions, 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 VI

Failure to timely and accurately report expenditures.

39. 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.

1. Where Respondents failed to report seventeen expenditures and inaccurately reported three expenditures, 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.

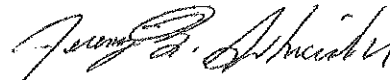
ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.011(9), 130.021, 130.031.2, 130.041.1, and 130.046, RSMo and pursuant to § 105.961.4, hereby **ORDERS**:

1. Respondents are 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 \$3,775.00, pursuant to Section 105.961.4(6), RSMo. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.
4. Respondents shall be jointly and severally liable for all fees imposed under this Order.

SO ORDERED, this 19th day of December, 2025.

By:



Jeremy Schneider, Chair
Missouri Ethics Commission