

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

**Filed**

**DEC 19 2025**

Missouri Ethics  
Commission

|                            |   |                    |
|----------------------------|---|--------------------|
| MISSOURI ETHICS            | ) |                    |
| COMMISSION,                | ) |                    |
|                            | ) |                    |
| Petitioner,                | ) |                    |
|                            | ) |                    |
| v.                         | ) |                    |
|                            | ) |                    |
| COMMITTEE TO ELECT         | ) | Case No. 22-0019-A |
| ROBERT DILLARD, Candidate  | ) |                    |
| Committee,                 | ) |                    |
|                            | ) |                    |
| and                        | ) |                    |
|                            | ) |                    |
| ROBERT DILLARD, 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), 130.021.4(1), 130.031.1, 130.034.1, 130.037, 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 Committee to Elect Robert Dillard is a candidate committee registered with the MEC on February 5, 2019.
2. Robert Dillard was an unsuccessful candidate for Alderman in the March 5, 2019, primary election.

### **COUNT 1**

#### **Failure To Terminate Committee**

3. Respondent Dillard was not a successful candidate in the March 5, 2019, election. Having reported no debt, the Committee to Elect Robert Dillard 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.

7. The committee's bank account was closed on July 15, 2019. At the time the bank account was closed, the committee had debt - \$548.40 owed to O.R. Pechman for an expenditure incurred on or about February 27, 2019, and \$239.92 owed to The Ink Spot for an expenditure incurred on or about March 4, 2019.

8. O.R. Pechman wrote the debt off at the close of the 2019 calendar year and The Ink Spot wrote the debt off on February 20, 2020. At the time the committee had no outstanding debt, it was required to terminate within thirty days.

*Failure To Maintain an Official Depository Account*

9. The committee's official depository account was closed in July 2019.

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

**COUNT II**

*Personal use of campaign contributions.*

11. On or about January 23, 2019, Respondents wrote a check to Roth Investments LLC in the amount of \$375.00. The candidate, Robert Dillard, who was also a performer, held a music show at the Gaslight Theater (owned by Roth Investments LLC) on January 27, 2019.

12. On or about January 27, 2019, Respondents paid two individuals a total of \$250.00 for "entertainment" – Joshua Lakes, who is a musician, and Allan Shipp.

13. Beginning March 18, 2019, Respondents made fifteen additional expenditures totaling \$393.87 at various restaurants, grocery stores and gas stations. These expenses happened after the March 5, 2019, primary election, seemingly without any purpose related to the campaign.

| Report Name         | Expenditure Name | Purpose | Amount          | Date    |
|---------------------|------------------|---------|-----------------|---------|
| 30-Day After 3-5-19 | Blue Iguana      | unknown | \$10.00         | 3/18/19 |
|                     | Crown Food       | unknown | \$32.29         | 3/18/19 |
|                     | McDonald's       | unknown | \$10.82         | 3/18/19 |
|                     | Jimmy John       | unknown | \$17.22         | 3/18/19 |
|                     | Motomart         | unknown | \$30.02         | 3/18/19 |
|                     | Subway           | unknown | \$24.99         | 3/20/19 |
|                     | CVS Pharmacy     | unknown | \$42.92         | 3/25/19 |
|                     | China King       | unknown | \$30.38         | 3/25/19 |
|                     | Square           | unknown | \$4.45          | 3/25/19 |
|                     | Square           | unknown | \$13.34         | 3/25/19 |
|                     | Walmart          | unknown | \$28.27         | 3/25/19 |
|                     | McDonald's       | unknown | \$14.03         | 3/25/19 |
|                     | BP               | unknown | \$38.15         | 3/25/19 |
|                     | Walmart          | unknown | \$75.94         | 3/26/19 |
|                     | Schnuck's        | unknown | \$21.05         | 3/26/19 |
| <b>Total</b>        |                  |         | <b>\$393.87</b> |         |

### COUNT III

*Cash contributions in excess of limits.*

14. Respondents made two cash deposits over \$100 each into the committee bank account. Without committee records, it is unknown if these deposits consisted of multiple contributions.

| Report Name         | Name                 | Amount          | Date    |
|---------------------|----------------------|-----------------|---------|
| 8-Day Before 3-5-19 | unknown cash deposit | \$140.00        | 1/23/19 |
| 8-Day Before 3-5-19 | unknown cash deposit | \$200.00        | 2/4/19  |
| <b>Total</b>        |                      | <b>\$340.00</b> |         |

### COUNT IV

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

15. Respondents failed to accurately report beginning and ending money on hand balances on its 8-Day Before 3-5-19 Election report.

### COUNT V

*Failure to timely file campaign finance disclosure reports.*

16. Respondents filed its 8-Day Before 3-5-19 Election report two days late.

17. Respondents failed to timely file fifteen reports and/or statements of limited activity.

| Report Name            | Report Year | Due Date   |
|------------------------|-------------|------------|
| 30-Day After 3-5-19    | 2019        | 4/4/19     |
| April 2019 Quarterly   | 2019        | 4/15/19    |
| July 2019 Quarterly    | 2019        | 7/15/19    |
| October 2019 Quarterly | 2019        | 10/15/19   |
| January 2020 Quarterly | 2020        | 1/15/2020  |
| April 2020 Quarterly   | 2020        | 4/15/2020  |
| July 2020 Quarterly    | 2020        | 7/15/2020  |
| October 2020 Quarterly | 2020        | 10/15/2020 |
| January 2021 Quarterly | 2021        | 1/15/2021  |
| April 2021 Quarterly   | 2021        | 4/15/2021  |
| July 2021 Quarterly    | 2021        | 7/15/2021  |
| October 2021 Quarterly | 2021        | 10/15/2021 |
| January 2022 Quarterly | 2022        | 1/18/2022  |
| April 2022 Quarterly   | 2022        | 4/15/2022  |
| July 2022 Quarterly    | 2022        | 7/15/2022  |

### COUNT VI

*Failure to timely and accurately report contributions.*

18. Respondents failed to report at least nineteen contributions totaling \$2,465.00.

| Contributor Name     | Amount   | Date    | Report Not Showing Contribution |
|----------------------|----------|---------|---------------------------------|
| Robert Dillard       | \$25.00  | 9/8/17  | 8-Day Before 3-5-19             |
| unknown              | \$35.00  | 1/22/19 | 8-Day Before 3-5-19             |
| unknown              | \$140.00 | 1/22/19 | 8-Day Before 3-5-19             |
| unknown              | \$10.00  | 1/22/19 | 8-Day Before 3-5-19             |
| unknown              | \$10.00  | 1/22/19 | 8-Day Before 3-5-19             |
| unknown cash deposit | \$140.00 | 1/23/19 | 8-Day Before 3-5-19             |
| Dale Sweet           | \$100.00 | 1/27/19 | 8-Day Before 3-5-19             |
| unknown              | \$175.00 | 1/27/19 | 8-Day Before 3-5-19             |
| unknown              | \$450.00 | 1/29/19 | 8-Day Before 3-5-19             |
| unknown              | \$230.00 | 1/29/19 | 8-Day Before 3-5-19             |
| unknown              | \$180.00 | 2/4/19  | 8-Day Before 3-5-19             |
| unknown cash deposit | \$200.00 | 2/4/19  | 8-Day Before 3-5-19             |
| unknown              | \$100.00 | 2/20/19 | 8-Day Before 3-5-19             |
| unknown cash deposit | \$60.00  | 2/27/19 | 30-Day After 3-5-19 not filed   |
| unknown              | \$75.00  | 3/1/19  | 30-Day After 3-5-19 not filed   |

|                 |                   |         |                               |
|-----------------|-------------------|---------|-------------------------------|
| unknown         | \$35.00           | 3/1/19  | 30-Day After 3-5-19 not filed |
| Colt Motors LLC | \$100.00          | 3/4/19  | 30-Day After 3-5-19 not filed |
| unknown         | \$35.00           | 3/12/19 | 30-Day After 3-5-19 not filed |
| unknown         | \$365.00          | 3/12/19 | 30-Day After 3-5-19 not filed |
| <b>Total</b>    | <b>\$2,465.00</b> |         |                               |

### COUNT VII

*Failure to timely and accurately report expenditures.*

19. Respondents failed to report thirty-seven expenditures totaling \$1,184.98.

| <b>Expenditure Name</b> | <b>Purpose</b>                   | <b>Amount</b> | <b>Date</b> | <b>Report Not Showing Expenditure</b> |
|-------------------------|----------------------------------|---------------|-------------|---------------------------------------|
| Checks                  | Checks                           | \$11.86       | 9/14/17     | 8-Day Before 3-5-19                   |
| Service charge          | Bank service charge              | \$2.50        | 9/18/17     | 8-Day Before 3-5-19                   |
| QT                      |                                  | \$10.00       | 9/18/17     | 8-Day Before 3-5-19                   |
| Service charge          | Bank service charge              | \$2.50        | 2/4/19      | 8-Day Before 3-5-19                   |
| Service charge          | Bank service charge              | \$2.50        | 2/4/19      | 8-Day Before 3-5-19                   |
| Service charge          | Bank service charge              | \$2.50        | 2/18/19     | 8-Day Before 3-5-19                   |
| ActBlue                 | ActBlue Fees                     | \$53.82       | n/a         | 8-Day Before 3-5-19                   |
| Facebook Tiarra         |                                  | \$40.00       | 2/22/19     | 30-Day After 3-5-19                   |
| Circle K                |                                  | \$3.53        | 2/25/19     | 30-Day After 3-5-19                   |
| Circle K                |                                  | \$15.15       | 2/25/19     | 30-Day After 3-5-19                   |
| Narwhal's Crafted       |                                  | \$17.50       | 2/25/19     | 30-Day After 3-5-19                   |
| Service charge          | Bank service charge              | \$2.50        | 2/26/19     | 30-Day After 3-5-19                   |
| Pizza Hut               |                                  | \$30.71       | 2/26/19     | 30-Day After 3-5-19                   |
| Overdraft Fee           | Overdraft for 2/26/19 Pizza Hut  | \$34.00       | 2/26/19     | 30-Day After 3-5-19                   |
| Service charge          | Bank service charge              | \$2.50        | 3/4/19      | 30-Day After 3-5-19                   |
| Overdraft Fee           | Overdraft for 2/27/19 OR Pechman | \$34.00       | 3/4/19      | 30-Day After 3-5-19                   |
| Returned Item Fee       | Fee for 2/27/19 OR Pechman       | \$34.00       | 3/4/19      | 30-Day After 3-5-19                   |
| Phillips 66             |                                  | \$28.36       | 3/4/19      | 30-Day After 3-5-19                   |
| Returned Item Fee       | Fee for 2/27/19 OR Pechman       | \$34.00       | 3/7/19      | 30-Day After 3-5-19                   |
| Returned Item Fee       | Fee for 3/4/19 The Ink Spot      | \$34.00       | 3/7/19      | 30-Day After 3-5-19                   |

|                  |              |                   |          |                     |
|------------------|--------------|-------------------|----------|---------------------|
| Blue Iguana      |              | \$10.00           | 3/18/19  | 30-Day After 3-5-19 |
| Crown Food       |              | \$32.29           | 3/18/19  | 30-Day After 3-5-19 |
| McDonald's       |              | \$10.82           | 3/18/19  | 30-Day After 3-5-19 |
| Jimmy John       |              | \$17.22           | 3/18/19  | 30-Day After 3-5-19 |
| Motomart         |              | \$30.02           | 3/18/19  | 30-Day After 3-5-19 |
| Subway           |              | \$24.99           | 3/20/19  | 30-Day After 3-5-19 |
| CVS Pharmacy     |              | \$42.92           | 3/25/19  | 30-Day After 3-5-19 |
| China King       |              | \$30.38           | 3/25/19  | 30-Day After 3-5-19 |
| Square           |              | \$4.45            | 3/25/19  | 30-Day After 3-5-19 |
| Square           |              | \$13.34           | 3/25/19  | 30-Day After 3-5-19 |
| Walmart          |              | \$28.27           | 3/25/19  | 30-Day After 3-5-19 |
| McDonald's       |              | \$14.03           | 3/25/19  | 30-Day After 3-5-19 |
| BP               |              | \$38.15           | 3/25/19  | 30-Day After 3-5-19 |
| Walmart          |              | \$75.94           | 3/26/19  | 30-Day After 3-5-19 |
| Schnuck's        |              | \$21.05           | 3/26/19  | 30-Day After 3-5-19 |
| ActBlue          | ActBlue Fees | \$20.18           | n/a      | 30-Day After 3-5-19 |
| Roth Investments |              | \$375.00          | 11/23/19 | 8-Day Before 3-5-19 |
| <b>Total</b>     |              | <b>\$1,184.98</b> |          |                     |

20. Respondents failed to report an expenditure incurred for \$548.40 and an expenditure incurred for \$239.92

| <b>Expenditure Name</b> | <b>Purpose</b> | <b>Amount</b>   | <b>Date</b> | <b>Report Not Showing Expenditure</b> |
|-------------------------|----------------|-----------------|-------------|---------------------------------------|
| OR Pechman              | Signage        | \$548.40        | 3/4/19      | 30-Day After 3-5-19                   |
| The Ink Spot            | Literature     | \$239.92        | 3/7/19      | 30-Day After 3-5-19                   |
| <b>Total</b>            |                | <b>\$788.32</b> |             |                                       |

21. Respondents reported a \$100 payment to a worker as a non-itemized expenditure.

## 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. Pursuant to § 130.037, RSMo:

If a debt service committee is formed, the committee may accept contributions from any person. A person who contributes to a debt service committee of a candidate may also contribute to the candidate's campaign committee for a succeeding election. The treasurer and the candidate shall terminate the debt service committee pursuant to section 130.021 when the contributions received exceed the amount of the debt, and within thirty days the committee shall file disclosure reports pursuant to section 130.041 and shall return any excess moneys received to the contributor or contributors, if known, otherwise such moneys shall escheat to the state. No debt service committee shall be in existence more than eighteen months.

24. Where Respondents was an unsuccessful candidate in the March 5, 2019, primary election, where the committee had no debt as of February 20, 2020, and where Respondents failed to terminate by March 21, 2020, there is probable cause to believe Respondents violated §§ 130.011(9) and 130.037 giving this Commission the power to act as permitted under § 105.961.

Failure To Maintain an Official Depository Account

25. 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."

26. "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.

27. 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

28. 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) giving this Commission the power to act as permitted under § 105.961.

## **COUNT II**

### *Personal use of campaign contributions.*

29. Section 130.034.1 prohibits the conversion of contributions to any personal use.

30. Where Respondents converted contributions to personal use on eighteen separate occasions, there is probable cause to believe Respondents violated § 130.034.1.

## **COUNT III**

### *Cash contributions in excess of limits.*

31. Section 130.031.1 sets limits on accepting cash contributions, stating, in relevant part: "No contribution of cash in an amount of more than one hundred dollars

shall be made by or accepted from any single contributor for any election by...a candidate committee.”

32. Where Respondents made two cash deposits over \$100 each into the committee bank account, there is probable cause to believe Respondents violated § 130.031.1 giving this Commission the power to act as permitted under § 105.961.

#### COUNT IV

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

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

34. 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.

35. Where Respondents failed to accurately report the beginning and ending money on hand on its 8-Day Before 3-5-19 Election report, there is probable cause to believe Respondents violated §§ 130.041.1(2) and 130.041.1(5), RSMo giving this Commission the power to act as permitted under § 105.961.

#### COUNT V

*Failure to timely file campaign finance disclosure reports.*

36. 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.

37. Pursuant to Section 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.

38. Where Respondents untimely filed one report and failed to timely file thirteen 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 VI

### *Failure to timely and accurately report contributions.*

39. 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.

40. Where Respondents failed to report at least nineteen 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 VII

### *Failure to timely and accurately report expenditures.*

41. 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.

Where Respondents failed to report at least thirty-seven expenditures, two incurred expenditures, and failed to itemize an expenditure made to a campaign worker, 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), 130.021.4(1), 130.031.1, 130.034.1, 130.037, 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 \$7,271.00, 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 19<sup>th</sup> day of December, 2025.

By:



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Jeremy Schneider, Chair  
Missouri Ethics Commission