

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

DEC 19 2025

**Missouri Ethics
Commission**

MISSOURI ETHICS
COMMISSION,

Petitioner,

v.

CITIZENS TO PROTECT SAINT
LOUIS, Continuing Committee,

and

BRANDON FRAZIER-BOSLEY,
Treasurer,

Respondents.

Case No. 23-0002-A

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 §§ 130.021.4(1), 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. Citizens to Protect Saint Louis is a campaign committee established with the MEC on February 22, 2019. The committee was terminated effective February 22, 2022.

2. Brandon Frazier-Bosley was treasurer for the duration of the committee.

COUNT I

Failure to maintain an official depository account

3. The committee's official depository account was closed September 20, 2021. The Termination Statement was not filed until February 22, 2022.

COUNT II

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

4. The ending money on hand was inaccurately stated on the April 2019 Quarterly Report.

5. The beginning money on hand was inaccurately stated on the Termination Report filed in 2022.

6. Due to an error in reporting loan forgiveness, the committee's indebtedness was incorrectly documented on the Termination Report filed in 2022.

COUNT III

Failure to timely and accurately file campaign finance disclosure reports.

7. Respondents filed a Statement of Limited Activity in lieu of the April 2020 Quarterly Report when a full disclosure report was required.

8. Respondents failed to timely file the April 2019 Quarterly Report. From 2019 to 2022, Respondents also failed to timely file eight Statements of Limited Activity in lieu of quarterly reports.

Report Name	Report Year	Due Date	Date Filed
April Quarterly Report	2019	4/15/19	5/29/19
July Quarterly Report - Limited Activity	2019	7/15/19	7/18/19
January Quarterly Report - Limited Activity	2020	1/15/20	4/20/20
April Quarterly Report - Limited Activity	2020	4/15/20	4/20/20
October Quarterly Report - Limited Activity	2020	10/15/20	2/22/22
April Quarterly Report - Limited Activity	2021	4/15/21	2/22/22
July Quarterly Report - Limited Activity	2021	7/15/21	2/22/22
October Quarterly Report - Limited Activity	2021	10/15/21	2/22/22
January Quarterly Report - Limited Activity	2022	1/17/22	2/22/22

COUNT IV

Failure to timely and accurately report contributions.

9. Respondents failed to report a \$250.00 monetary contribution from Kenny's Auto Repair and Sales on the April 2019 Quarterly Report.

COUNT V

Failure to timely and accurately report expenditures.

10. Respondents failed to report forty monetary expenditures totaling \$706.50.

Expenditure Name	Purpose	Amount	Date	Report Not Showing Expenditure
Family Dollar	Unknown	\$8.77	5/31/19	April 2020 Quarterly
BP	Gas	\$20.39	6/2/19	April 2020 Quarterly
Quiktrip	Unknown	\$8.71	7/31/19	April 2020 Quarterly
MetroPCS Bellevue, WA	Unknown	\$90.00	8/2/19	April 2020 Quarterly

Sq*The Worl... St. Louis	Unknown	\$14.39	8/2/19	April 2020 Quarterly
Shake Shack	Food & beverage	\$24.31	8/22/19	April 2020 Quarterly
Shake Shack	Food & beverage	\$5.85	8/22/19	April 2020 Quarterly
BP	Gas	\$41.90	9/8/19	April 2020 Quarterly
Rally's	Food & beverage	\$7.68	9/11/19	April 2020 Quarterly
BP	Unknown	\$2.74	9/11/19	April 2020 Quarterly
Family Dollar	Unknown	\$7.08	9/12/19	April 2020 Quarterly
Sq *YOU GOTTT St. Louis	Unknown	\$13.52	9/12/19	April 2020 Quarterly
BP	Gas	\$23.83	9/14/19	April 2020 Quarterly
Dominos	Food & beverage	\$13.14	9/13/19	April 2020 Quarterly
Adso Inc. St. Louis, MO	Unknown	\$42.01	9/15/19	April 2020 Quarterly
Schnucks	Food & beverage	\$15.96	9/15/19	April 2020 Quarterly
Autozone	Unknown	\$5.80	9/15/19	April 2020 Quarterly
Exxonmobil	Unknown	\$3.49	9/15/19	April 2020 Quarterly
Lees Famous Chicken	Food & beverage	\$7.22	9/16/19	April 2020 Quarterly
BP	Gas	\$40.00	9/18/19	April 2020 Quarterly
Autozone	Unknown	\$10.96	9/19/19	April 2020 Quarterly
Autozone	Unknown	\$14.16	9/22/19	April 2020 Quarterly
Dominos	Food & beverage	\$7.67	9/22/19	April 2020 Quarterly
BP	Gas	\$32.88	1/17/20	April 2020 Quarterly
BP	Gas	\$19.53	1/17/20	April 2020 Quarterly
Dominos	Food & beverage	\$27.38	1/17/20	April 2020 Quarterly
Phillips 66	Unknown	\$3.30	1/18/20	April 2020 Quarterly
Quiktrip	Unknown	\$11.23	1/18/20	April 2020 Quarterly
Rally's	Food & beverage	\$9.25	1/19/20	April 2020 Quarterly
US Bank	Card fee	\$1.00	1/20/20	April 2020 Quarterly
US Bank ATM	Unknown	\$20.00	1/20/20	April 2020 Quarterly
US Bank	ATM fee	\$3.00	1/20/20	April 2020 Quarterly
US Bank	Card fee	\$1.00	1/20/20	April 2020 Quarterly
Quiktrip	Gas	\$40.00	1/20/20	April 2020 Quarterly
Wal-Mart Florissant, MO	Unknown	\$68.35	1/22/20	April 2020 Quarterly
Quiktrip	Unknown	\$11.95	1/21/20	April 2020 Quarterly
Quiktrip	Unknown	\$11.39	1/21/20	April 2020 Quarterly
Mini Market	Unknown	\$8.69	1/22/20	April 2020 Quarterly
Raising Cane	Food & beverage	\$6.97	6/17/20	Termination Report
US Bank	Minimum balance fee	\$1.00	9/30/21	Termination Report
Total		\$706.50		

11. Respondents reported two monetary expenditures, totaling \$34.83, on the wrong report.

CONCLUSIONS OF LAW

COUNT I

Failure to maintain an official depository account

12. 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."

13. Where Respondents failed to maintain an official depository account with an active 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

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

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

15. 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.

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

17. Where Respondents failed to accurately report the beginning and ending money on hand and indebtedness on several reports, 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 III

Failure to timely and accurately file campaign finance disclosure reports.

18. Pursuant to § 130.046.1, RSMo, "all committees must file regular campaign finance disclosure reports at the following times and for the following periods: (3) Not later than the fifteenth day following the close of each calendar quarter."

19. Pursuant to § 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.

20. Where Respondents filed a Statement of Limited Activity that should have been a full disclosure report and failed to timely file a full report and eight 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 IV

Failure to timely and accurately report contributions.

21. 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.

22. Where Respondents failed to report a \$250.00 contribution, 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 V

Failure to timely and accurately report expenditures.

23. 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 forty expenditures totaling \$706.50 and properly report two 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.

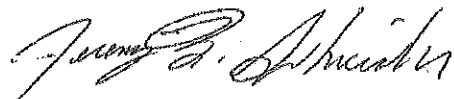
ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.021.4(1), 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 \$2,956.00, 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