

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

DEC 19 2025

Missouri Ethics
Commission

MISSOURI ETHICS
COMMISSION,

Petitioner,

v.

CITIZENS FOR BRANDON
BOSLEY, Candidate Committee,

BRANDON BOSLEY, Candidate,

Respondents.

Case No. 23-0004-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 §§ 130.011(9),

130.021.4(1), 130.021.5(6), 130.031, 130.034.1, 130.041.1, 130.046 and 130.050.3, 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 Brandon Bosley was successful in his run for City of St. Louis Ward 3 Alderperson in the April 4, 2017, and April 6, 2021, elections. He was unsuccessful in his run for Ward 14 Alderperson in the March 7, 2023, election.

2. Respondent Citizens for Brandon Bosley is a candidate committee established with the Missouri Ethics Commission on January 3, 2017.

COUNT 1

Failure To Terminate Committee

3. Respondent Brandon Bosley was unsuccessful in the March 7, 2023, primary election. Respondent Citizens for Brandon Bosley did not have outstanding debt.

4. The municipal general election for St. Louis, MO was April 4, 2023.

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 4, 2023.

6. Respondents did not terminate by May 4, 2023.

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

7. Respondents opened an official depository account at Lindell Bank on or about January 13, 2017. An amended Statement of Committee Organization reporting the change was not filed until September 18, 2017. Respondents closed the committee's account at Lindell Bank on November 16, 2018.

8. Respondents opened a committee account at Enterprise Bank on or about March 19, 2021. Respondents closed the committee's account on November 14, 2022.

9. Respondents opened a new committee account at Enterprise Bank on or about January 31, 2023.

10. Respondents did not amend the Statement of Committee Organization to reflect the changes in the committee's accounts.

COUNT II

Personal use of campaign contributions.

11. In 2018, Respondents made a \$119.55 expenditure to ADT, a home and business security company. Respondents did not provide records or clarification to explain how the payment was an allowable use of campaign finance funds; it appears the expenditure was for personal purposes.

COUNT III

Cash contributions and cash expenditures in excess of limits.

12. In 2023, Respondents made a cash deposit of \$270.00. If this was a single contribution, it exceeded the \$100 allowable amount. Without committee records, it

is unknown whether the cash included multiple contributions and the amount of each one.

13. In 2021, Respondents made ten cash expenditures to campaign workers, totaling \$1,900.00, each one exceeding the \$50 allowable amount for each cash expenditure made.

COUNT IV

Failure to accurately report beginning and ending money on hand.

14. The beginning money on hand was inaccurately stated on four reports in 2017 and one in 2018.

15. The ending money on hand was inaccurately stated on five reports in 2017, one in 2018 and one in 2021.

COUNT V

Failure to timely file campaign finance disclosure reports.

16. Respondents filed a Statement of Limited Activity in lieu of the April 2019 Quarterly Report when a full disclosure report was required.

17. Respondents failed to timely file fifteen reports.

Report Name	Report Year	Due Date	Date Filed
40 Day Before Special Charter Election - 3/7/17	2017	1/26/17	1/27/17
8 Day Before Special Charter Election - 3/7/17	2017	2/27/17	2/28/17
8 Day Before General Election - 4/4/17	2017	3/27/17	3/31/17
July Quarterly Report	2017	7/17/17	8/14/17
October Quarterly Report	2017	10/16/17	12/21/17
January Quarterly Report - Limited Activity	2018	1/15/18	1/16/18
April Quarterly Report - Limited Activity	2018	4/16/18	5/31/18
October Quarterly Report - Limited Activity	2018	10/15/18	10/19/18
April Quarterly Report - Limited Activity	2019	4/15/19	7/19/19
July Quarterly Report - Limited Activity	2019	7/15/19	7/19/19
January Quarterly Report - Limited Activity	2020	1/15/20	6/30/20
April Quarterly Report - Limited Activity	2020	4/15/20	6/30/20
October Quarterly Report - Limited Activity	2020	10/15/20	12/3/20

January Quarterly Report - Limited Activity	2022	1/17/22	2/22/22
July Quarterly Report - Limited Activity	2022	7/15/22	9/29/22

18. Respondents failed to file seven reports and seven 24 Hour Notices Late Contributions/Loans Received.

Report/Notice Name	Report Year	Due Date
April Quarterly Report - Limited Activity	2017	4/17/17
24 Hour Notice Late Contributions/Loans Received - 3/7/17	2017	2/29/17
24 Hour Notice Late Contributions/Loans Received - 3/7/17	2017	3/3/17
24 Hour Notice Late Contributions/Loans Received - 3/7/17	2017	3/4/17
24 Hour Notice Late Contributions/Loans Received - 3/7/17	2017	3/7/17
April Quarterly Report	2018	4/16/18
April Quarterly Report - Limited Activity	2021	4/15/21
24 Hour Notice Late Contributions/Loans Received - 3/7/23	2023	3/1/23
24 Hour Notice Late Contributions/Loans Received - 3/7/23	2023	3/2/23
24 Hour Notice Late Contributions/Loans Received - 3/7/23	2023	3/6/23
April Quarterly Report	2023	4/17/23
30 Day After Special Election - 3/7/23	2023	4/6/23
July Quarterly Report	2023	7/17/23
October Quarterly Report	2023	10/16/23

19. Respondents entered an incorrect start date on the 30 Day After Reports for the April 4, 2017, general election and the April 6, 2021 general election. Both reports also included activity reported prior to the correct start date of the reporting period.

COUNT VI

Failure to timely and accurately report contributions.

20. Respondents failed to report fifty-three monetary contributions totaling \$18,042.00 and five miscellaneous receipts. Attachment 1.

21. Respondents inaccurately reported two monetary contributions totaling \$1,000.00. One was reported with the wrong name and on the wrong report; the other showed no address or occupation information, as required.

22. Respondents failed to timely report seventeen monetary contributions totaling \$4,010.00. The January 2018 Quarterly Report, due January 15, 2018, was originally filed on January 16, 2018 as a Statement of Limited Activity. The contributions were reported on an amended report filed on May 31, 2018.

23. Respondents reported three contributions, totaling \$1,000.00, that were not found in the official depository account.

COUNT VII

Failure to timely and accurately report expenditures.

24. Respondents failed to report two hundred twenty expenditures totaling \$19,078.23. This figure includes fifteen payments to campaign workers totaling \$3,025. Attachment 2.

25. Respondents inaccurately reported forty expenditures totaling \$3,081.11. There were expenditures reported with incorrect amounts, reported twice, while others were reported without a purpose, or incorrectly reported as non-itemized expenditures.

26. Respondents failed to timely report forty expenditures totaling \$4,648.45. The January 2018 Quarterly Report, due January 15, 2018, was originally filed on January 16, 2018, as a Statement of Limited Activity. The expenditures were reported on an amended report filed on May 31, 2018.

27. Respondents reported two payments to campaign workers, totaling \$70.00, that could not be found in the official depository account.

CONCLUSIONS OF LAW

COUNT 1

Failure To Terminate Committee

28. 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[.]

29. 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.

30. Where Respondent was an unsuccessful candidate in the March 7, 2023, primary election, where the committee had no debt, and where Respondents failed to terminate by May 4, 2023, 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 and Amend Statement of Committee Organization

31. 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.”

32. “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.

33. 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.

34. Where Respondents closed and opened multiple committee bank accounts but failed to timely amend the Statement of Committee Organization to reflect the changes, 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

Personal use of campaign contributions.

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

36. Where Respondents converted a contribution to personal use, there is probable cause to believe Respondents violated § 130.034.1.

COUNT III

Cash contributions and cash expenditures in excess of limits.

37. For purposes of Chapter 130, RSMo, cash means “currency, coin, United States postage stamps, or any negotiable instrument which can be transferred from one person to another person without the signature or endorsement of the transferor.” § 130.011(4), RSMo.

38. “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.” § 130.031.1, RSMo.

39. “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.

40. Where Respondents deposited a cash contribution over \$100 and made ten cash expenditures over \$50 each, there is probable cause to believe Respondents violated §§ 130.031.1 and 130.031.2 giving this Commission the power to act as permitted under § 105.961.

COUNT IV

Failure to accurately report beginning and ending money on hand.

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

42. 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.

43. Where Respondents failed to accurately report the beginning and ending money on hand on multiple reports, 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.

44. 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. Notwithstanding the provisions of this subsection, if any committee accepts contributions or makes expenditures in support of or in opposition to a ballot measure or a candidate, and the report required by this subsection for the most recent calendar quarter is filed prior to the fortieth day before the election on the measure or candidate, the committee shall file an additional disclosure report not later than the

fortieth day before the election for the period closing on the forty-fifth day before the election.

45. 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.

46. "The receipt of any late contribution or loan of more than two hundred fifty dollars by a candidate committee supporting a candidate for statewide office or by any other committee shall be reported to the appropriate officer no later than twenty-four hours after receipt. For purposes of this subsection the term "late contribution or loan" means a contribution or loan received after the closing date of the last disclosure report required to be filed before an election but received prior to the date of the election itself. "§ 130.050.3, RSMo.

47. Where Respondents filed a statement of limited activity that should have been a full report, untimely filed fifteen reports, and failed to file fourteen report and/or notices, there is probable cause to believe Respondents violated §§ 130.046 and 130.050.3, RSMo, giving this Commission the power to act as permitted under § 105.961.

COUNT VI

Failure to timely and accurately report contributions.

48. 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.

49. "All contributions which the committee receives in money, checks and other negotiable instruments shall be deposited in a committee's official depository account." § 130.021.4(1), RSMo.

50. Where Respondents failed to report fifty-three contributions and miscellaneous receipts, failed to timely report seventeen contributions, inaccurately

reported two contributions, and reported three contributions that could not be found in the committee's bank account, there is probable cause to believe Respondents violated §§ 130.021.4(1) and 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.

51. 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.

52. "Contributions shall not be accepted, and expenditures shall not be made by a committee except by or through an official depository account[.]" § 130.021.4(1), RSMo.

Where Respondents failed to report two hundred twenty expenditures, inaccurately reported forty expenditures, untimely report forty expenditures, and reported two expenditures that could not be found in the committee's bank account,

there is probable cause to believe Respondents violated §§ 130.021.4(1) and 130.041.1(4), RSMo, giving this Commission the power to act as permitted under § 105.961.

Attachment 1

Contributor Name	Amount	Date	Report Not Showing Contribution
Darlynn Cunningham Bosley	\$100.00	1/31/17	8 Day Before Special 3/7/17
Tracy Denise & Glenn Beavers	\$25.00	1/31/17	8 Day Before Special 3/7/17
Joseph D. Roddy	\$100.00	12/5/17	8 Day Before General 4/4/17
Randy S. Brown	\$100.00	2/13/23	8 Day Before Primary 3/7/23
Leroy Grant	\$100.00	2/21/23	8 Day Before Primary 3/7/23
Laverta M. Harris	\$50.00	3/1/23	Apr Quarterly 2023
Illegible	\$100.00	3/1/23	Apr Quarterly 2023
Sterling Moody	\$100.00	3/1/23	Apr Quarterly 2023
Carl N. Joyce, Sr.	\$50.00	3/8/23	Apr Quarterly 2023
May L. Graham	\$25.00	3/8/23	Apr Quarterly 2023
Debra Robinson	\$50.00	3/8/23	Apr Quarterly 2023
Michael & Gail Ferrer	\$50.00	3/8/23	Apr Quarterly 2023
William Holman	\$5.00	3/8/23	Apr Quarterly 2023
Henry Woods	\$5.00	3/8/23	Apr Quarterly 2023
James McNary	\$20.00	3/8/23	Apr Quarterly 2023
Jerry Hall	\$50.00	3/8/23	Apr Quarterly 2023
Leon Ohara	\$50.00	3/8/23	Apr Quarterly 2023
B Wyatt	\$50.00	3/16/23	Apr Quarterly 2023
Christian Herman	\$100.00	3/16/23	Apr Quarterly 2023
Ornetha Walls	\$50.00	3/16/23	Apr Quarterly 2023
Marlene Davis	\$100.00	3/16/23	Apr Quarterly 2023
Candace Rankins	\$50.00	3/16/23	Apr Quarterly 2023
Matt Newsham	\$50.00	3/16/23	Apr Quarterly 2023
Allan Person	\$25.00	3/16/23	Apr Quarterly 2023
ShaNea Johnson	\$25.00	3/16/23	Apr Quarterly 2023
Ken Nutt	\$25.00	3/16/23	Apr Quarterly 2023
Leon O'Hara IV	\$25.00	3/16/23	Apr Quarterly 2023
Diana H Solomon-Glover	\$25.00	3/16/23	Apr Quarterly 2023
Melanie Evans	\$50.00	3/16/23	Apr Quarterly 2023
VR, Inc. dba Grand Hotel	\$1,000.00	1/31/17	8 Day Before Special 3/7/17
Bethlehem Eva. Lutheran Church	\$300.00	2/28/17	8 Day Before General 4/4/17
Brent Crittenden & Sarah Gibson	\$950.00	2/28/17	8 Day Before General 4/4/17
Rashidul Ayesha Haq	\$300.00	2/28/17	8 Day Before General 4/4/17
James Holtzman	\$367.00	2/28/17	8 Day Before General 4/4/17
Frederick Searcy, Jr.	\$200.00	5/31/18	Apr Quarterly 2019
Gas Mart 26	\$750.00	10/31/18	Apr Quarterly 2019
St. Louis Association of Realtors PAC	\$500.00	3/23/21	8 Day Before Primary 3/7/23
Petra Oil, Inc.	\$1,000.00	1/31/23	8 Day Before Primary 3/7/23
SRTCARS LLC DBA ZEE'S AUTO SALES	\$500.00	1/31/23	8 Day Before Primary 3/7/23
David W. Sweeney	\$500.00	1/31/23	8 Day Before Primary 3/7/23
Lois D. Conley	\$200.00	1/31/23	8 Day Before Primary 3/7/23
Gas Mart 26	\$2,000.00	2/13/23	8 Day Before Primary 3/7/23

Deconstruction Development Partners, LLC	\$2,500.00	2/21/23	8 Day Before Primary 3/7/23
HT Holdings, LLC	\$2,500.00	2/21/23	8 Day Before Primary 3/7/23
Prenness E. Josey	\$200.00	3/1/23	Apr Quarterly 2023
Laura M. Keys	\$200.00	3/1/23	Apr Quarterly 2023
North County Alive PAC	\$200.00	3/1/23	Apr Quarterly 2023
ND Properties, LLC	\$300.00	3/1/23	Apr Quarterly 2023
Freeman R. & Sydney C. Bosley	\$500.00	3/1/23	Apr Quarterly 2023
Cash deposit	\$270.00	3/1/23	Apr Quarterly 2023
Reginald Jones	\$250.00	3/16/23	Apr Quarterly 2023
Eugene Bosley	\$500.00	3/16/23	Apr Quarterly 2023
Clifford Franklin	\$500.00	3/16/23	Apr Quarterly 2023
Micro Center	\$8.77	3/6/17	8 Day Before General 4/4/17
Enterprise Bank	\$8.02	11/14/22	8 Day Before Primary 3/7/23
Enterprise Bank	\$0.85	2/28/23	Apr Quarterly 2023
Enterprise Bank	\$0.64	3/31/23	Apr Quarterly 2023
Walmart	\$161.33	3/7/23	Apr Quarterly 2023
Total	\$18,042.00		

Attachment 2.

Expenditure Name	Purpose	Amount	Date	Report Not Showing Expenditure
SQ *No Strings Atta St. Louis	Unknown	\$33.51	2/28/17	8 Day Before General 4/4/17
Gas Mart St. Louis	gas station	\$23.60	2/28/17	8 Day Before General 4/4/17
Lindell Bank	Service fees	\$20.00	2/28/17	8 Day Before General 4/4/17
Barry Collins - official check	Cleaning services	\$100.00	2/28/17	8 Day Before General 4/4/17
Lindell Bank	Bank check fee	\$5.00	2/28/17	8 Day Before General 4/4/17
BP St. Louis	gas station	\$31.37	3/2/17	8 Day Before General 4/4/17
Microcenter Brentwood	Computer store	\$52.78	3/2/17	8 Day Before General 4/4/17
Wal-Mart Super Center Maplewood	Unknown	\$79.87	3/2/17	8 Day Before General 4/4/17
Lorena Taylor	Election worker	\$100.00	3/7/17	8 Day Before General 4/4/17
Darryl Marks	Election worker	\$100.00	3/7/17	8 Day Before General 4/4/17
D. Lampkin	Election worker	\$45.00	3/7/17	8 Day Before General 4/4/17
Doreather Lampkin	Election worker	\$100.00	3/7/17	8 Day Before General 4/4/17
BP St. Louis	gas station	\$36.27	4/5/17	30 Day After General 4/4/17
Exxonmobil St. Louis	gas station	\$37.54	4/12/17	30 Day After General 4/4/17
BP St. Louis	gas station	\$38.03	4/18/17	30 Day After General 4/4/17
Lindell Bank	Return item fee	\$36.00	4/20/17	30 Day After General 4/4/17
Exxonmobil St. Louis	gas station	\$10.00	4/28/17	30 Day After General 4/4/17

Lindell Bank	Service fees	\$20.00	4/28/17	30 Day After General 4/4/17
Dollar Tree	Unknown	\$30.43	7/3/17	30 Day After General 4/4/17
Wal-Mart Maplewood	Unknown	\$20.96	7/5/17	Oct Quarterly 2017
Aldi St. Louis	Unknown	\$25.14	7/18/17	Oct Quarterly 2017
Mobil St. Louis	gas station	\$26.85	7/18/17	Oct Quarterly 2017
Family Dollar St. Louis	Unknown	\$44.56	7/24/17	Oct Quarterly 2017
Mobil St. Louis	gas station	\$25.28	7/27/17	Oct Quarterly 2017
Family Dollar St. Louis	Unknown	\$21.87	7/31/17	Oct Quarterly 2017
Lindell Bank	Service fees	\$20.00	7/31/17	Oct Quarterly 2017
Lindell Bank	Service fees	\$20.00	8/31/17	Oct Quarterly 2017
Gas Mart St. Louis	gas station	\$30.48	9/18/17	Oct Quarterly 2017
Phillips 66 St. Louis	gas station	\$26.00	9/25/17	Oct Quarterly 2017
Mobil St. Louis	gas station	\$29.07	9/29/17	Oct Quarterly 2017
Lindell Bank	Service fees	\$20.00	9/29/17	Oct Quarterly 2017
BP St. Louis	gas station	\$3.36	10/2/17	Jan Quarterly 2018
Phillips 66 St. Louis	gas station	\$1.47	10/12/17	Jan Quarterly 2018
Lindell Bank	Return item fee	\$36.00	10/31/17	Jan Quarterly 2018
Lindell Bank	Service fees	\$20.00	10/31/17	Jan Quarterly 2018
Lindell Bank	Return item fee	\$36.00	11/3/17	Jan Quarterly 2018
Lindell Bank	Return item fee	\$36.00	11/14/17	Jan Quarterly 2018
Lindell Bank	Return item fee	\$36.00	11/21/17	Jan Quarterly 2018
Lindell Bank	Return item fee	\$36.00	11/27/17	Jan Quarterly 2018
Lindell Bank	Service fees	\$20.00	11/30/17	Jan Quarterly 2018
Lindell Bank	Service fees	\$20.00	12/29/17	Jan Quarterly 2018
Lindell Bank	Service fees	\$20.00	2/28/18	Apr Quarterly 2019
Lindell Bank	Service fees	\$20.00	3/30/18	Apr Quarterly 2019
Lindell Bank	Service fees	\$20.00	4/30/18	Apr Quarterly 2019
Lindell Bank	Return item fee	\$36.00	5/16/18	Apr Quarterly 2019
Lindell Bank	Return item fee	\$36.00	5/21/18	Apr Quarterly 2019
Lindell Bank	Service fees	\$20.00	5/31/18	Apr Quarterly 2019
Lindell Bank	Service fees	\$20.00	6/29/18	Apr Quarterly 2019
Lindell Bank	Service fees	\$20.00	7/31/18	Apr Quarterly 2019
Lindell Bank	Service fees	\$20.00	8/31/18	Apr Quarterly 2019
Lindell Bank	Service fees	\$20.00	9/28/18	Apr Quarterly 2019
Lindell Bank	Service fees	\$20.00	10/31/18	Apr Quarterly 2019
PX Store St. Louis	Unknown	\$11.49	11/5/18	Apr Quarterly 2019
BP St. Louis	gas station	\$7.67	11/5/18	Apr Quarterly 2019
Lee's Famous Recipe St. Louis	Food	\$7.22	11/5/18	Apr Quarterly 2019
PX Store St. Louis	Unknown	\$4.34	11/5/18	Apr Quarterly 2019
New York Grill Florissant	Food	\$7.58	11/6/18	Apr Quarterly 2019
Family Dollar, St. Louis	Unknown	\$2.13	11/6/18	Apr Quarterly 2019

Trina's Starlite Lounge	Food	\$25.54	11/7/18	Apr Quarterly 2019
Uber Trip	Transportation	\$21.80	11/7/18	Apr Quarterly 2019
Shell Oil Florissant	gas station	\$20.10	11/7/18	Apr Quarterly 2019
Autozone St. Louis	Unknown	\$16.44	11/7/18	Apr Quarterly 2019
White Castle St. Louis	Food	\$2.65	11/7/18	Apr Quarterly 2019
Uber Trip	Transportation	\$5.45	11/8/18	Apr Quarterly 2019
Uber Trip	Transportation	\$5.22	11/8/18	Apr Quarterly 2019
Uber Trip	Transportation	\$30.21	11/9/18	Apr Quarterly 2019
Goldcoast LB ORD Chicago, IL	Food	\$11.03	11/9/18	Apr Quarterly 2019
BP St. Louis	gas station	\$1.46	11/9/18	Apr Quarterly 2019
Boost Mobile	Phone service/products	\$100.00	11/13/18	Apr Quarterly 2019
Home Depot Florissant	Unknown	\$63.45	11/13/18	Apr Quarterly 2019
Fortune Teller Bar St. Louis	Food	\$56.00	11/13/18	Apr Quarterly 2019
Yaquis on Cherokee St. Louis	Food	\$30.54	11/13/18	Apr Quarterly 2019
Shell Oil Florissant	gas station	\$28.20	11/13/18	Apr Quarterly 2019
Exxonmobil St. Louis	gas station	\$25.24	11/13/18	Apr Quarterly 2019
Mangoes Grill Fish St. Louis	Food	\$19.66	11/13/18	Apr Quarterly 2019
Popeye's St. Louis	Food	\$14.43	11/13/18	Apr Quarterly 2019
J and W Package Liquor St. Louis	Unknown	\$8.75	11/13/18	Apr Quarterly 2019
BP St. Louis	gas station	\$7.67	11/13/18	Apr Quarterly 2019
Phillip Barnes	Memo says "work"	\$50.00	11/4/18	Apr Quarterly 2019
Imo's Pizza St. Louis	Food	\$19.90	11/14/18	Apr Quarterly 2019
Exxonmobil St. Louis	gas station	\$9.79	11/14/18	Apr Quarterly 2019
Phillips 66 St. Louis	gas station	\$23.67	11/15/18	Apr Quarterly 2019
BP St. Louis	gas station	\$16.26	11/16/18	Apr Quarterly 2019
QT 638 St. Louis	gas station	\$10.96	11/16/18	Apr Quarterly 2019
Enterprise Bank	Bank analysis fee	\$3.97	4/22/21	30 Day After General 4/6/21
Enterprise Bank	Account analysis fee	\$3.95	5/26/21	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$3.99	6/16/21	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$3.99	7/21/21	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$3.99	8/19/21	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$3.99	9/17/21	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$3.99	10/19/21	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$3.99	11/17/21	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$3.99	12/17/21	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$3.99	1/18/22	8 Day Before Primary 3/7/23

Enterprise Bank	Account analysis fee	\$3.99	2/15/22	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$3.99	3/16/22	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$3.99	4/19/22	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$3.99	5/16/22	8 Day Before Primary 3/7/23
Enterprise Bank	Dormant account fee	\$10.00	5/31/22	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$3.99	6/16/22	8 Day Before Primary 3/7/23
Enterprise Bank	Dormant account fee	\$10.00	6/30/22	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$4.00	7/18/22	8 Day Before Primary 3/7/23
Enterprise Bank	Dormant account fee	\$10.00	7/29/22	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$4.00	8/19/22	8 Day Before Primary 3/7/23
Enterprise Bank	Dormant account fee	\$2.21	8/31/22	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$4.00	9/15/22	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$4.02	10/17/22	8 Day Before Primary 3/7/23
Enterprise Bank	Account analysis fee	\$6.00	2/16/23	8 Day Before Primary 3/7/23
Diner's Delight St. Louis	Food	\$58.65	2/22/23	8 Day Before Primary 3/7/23
Petromart St. Charles	gas station	\$20.00	2/23/23	8 Day Before Primary 3/7/23
White Castle St. Louis	Food	\$7.40	2/24/23	Apr Quarterly 2023
Sq *You Gotta Eat St. Louis	Food	\$28.23	2/24/23	Apr Quarterly 2023
Petra Oil St. Louis	gas station	\$4.40	2/27/23	Apr Quarterly 2023
Walmart Supercenter Maplewood	Unknown	\$68.69	2/27/23	Apr Quarterly 2023
Subway St. Louis	Food	\$7.87	2/27/23	Apr Quarterly 2023
King Grill St. Louis	Food	\$42.73	2/27/23	Apr Quarterly 2023
Sq *You Gotta Eat St. Louis	Food	\$43.60	2/27/23	Apr Quarterly 2023
BP St. Louis	gas station	\$100.00	2/27/23	Apr Quarterly 2023
Domino's St. Louis	Food	\$23.00	2/28/23	Apr Quarterly 2023
King Grill St. Louis	Food	\$39.43	2/28/23	Apr Quarterly 2023
Diner's Delight St. Louis	Food	\$34.47	3/1/23	Apr Quarterly 2023
Rally's St. Louis	Food	\$9.53	3/2/23	Apr Quarterly 2023
Wendy's St. Louis	Food	\$12.43	3/2/23	Apr Quarterly 2023
Burger King St. Louis	Food	\$13.51	3/2/23	Apr Quarterly 2023
BP St. Louis	gas station	\$36.60	3/2/23	Apr Quarterly 2023
BP St. Louis	gas station	\$3.71	3/6/23	Apr Quarterly 2023
BP St. Louis	gas station	\$5.16	3/6/23	Apr Quarterly 2023
Family Dollar St. Louis	Unknown	\$53.65	3/6/23	Apr Quarterly 2023
BP St. Louis	gas station	\$10.00	3/6/23	Apr Quarterly 2023
Popeye's St. Louis	Food	\$10.66	3/6/23	Apr Quarterly 2023

White Castle St. Louis	Food	\$11.26	3/6/23	Apr Quarterly 2023
Burger King St. Louis	Food	\$15.73	3/6/23	Apr Quarterly 2023
Subway St. Louis	Food	\$16.43	3/6/23	Apr Quarterly 2023
DNH*Godaddy.com	Website	\$22.16	3/6/23	Apr Quarterly 2023
BP St. Louis	gas station	\$25.16	3/6/23	Apr Quarterly 2023
Subway St. Louis	Food	\$39.40	3/6/23	Apr Quarterly 2023
BP St. Louis	gas station	\$47.62	3/6/23	Apr Quarterly 2023
Imo's Pizza St. Louis	Food	\$91.68	3/6/23	Apr Quarterly 2023
Family Dollar St. Louis	Unknown	\$10.95	3/7/23	Apr Quarterly 2023
BP St. Louis	gas station	\$10.25	3/7/23	Apr Quarterly 2023
BP St. Louis	gas station	\$35.09	3/7/23	Apr Quarterly 2023
Lee's Chicken St. Louis	Food	\$10.88	3/8/23	Apr Quarterly 2023
Taco Bell St. Louis	Food	\$14.21	3/8/23	Apr Quarterly 2023
Petra Oil St. Louis	gas station	\$20.00	3/8/23	Apr Quarterly 2023
Wix.com	Website	\$23.00	3/8/23	Apr Quarterly 2023
The Grand Zodia St. Louis	Food	\$35.86	3/8/23	Apr Quarterly 2023
Chick-fil-a Brentwood	Food	\$43.91	3/8/23	Apr Quarterly 2023
Boost Mobile	Phone service/products	\$57.00	3/9/23	Apr Quarterly 2023
White Castle St. Louis	Food	\$16.20	3/10/23	Apr Quarterly 2023
Diner's Delight St. Louis	Food	\$89.44	3/13/23	Apr Quarterly 2023
Domino's St. Louis	Food	\$15.33	3/13/23	Apr Quarterly 2023
Clayton Davis	Campaign worker	\$100.00	3/7/23	Apr Quarterly 2023
Darren Cunningham	Campaign worker	\$100.00	3/8/23	Apr Quarterly 2023
Charles Wilson	Campaign worker	\$50.00	3/7/23	Apr Quarterly 2023
Sean Hughes	Campaign worker	\$50.00	3/7/23	Apr Quarterly 2023
Family Dollar St. Louis	Unknown	\$27.97	3/15/23	Apr Quarterly 2023
Rally's St. Louis	Food	\$20.84	3/15/23	Apr Quarterly 2023
Enterprise Bank	Account analysis fee	\$6.00	3/16/23	Apr Quarterly 2023
Rally's St. Louis	Food	\$7.13	3/16/23	Apr Quarterly 2023
Lee's Chicken St. Louis	Food	\$17.41	3/17/23	Apr Quarterly 2023
BP St. Louis	gas station	\$13.85	3/20/23	Apr Quarterly 2023
Petra Oil St. Louis	gas station	\$20.00	3/20/23	Apr Quarterly 2023
Domino's St. Louis	Food	\$61.67	3/20/23	Apr Quarterly 2023
Petra Oil St. Louis	gas station	\$3.18	3/22/23	Apr Quarterly 2023
White Castle St. Louis	Food	\$8.55	3/22/23	Apr Quarterly 2023

Petra Oil St. Louis	gas station	\$10.19	3/22/23	Apr Quarterly 2023
Burger King St. Louis	Food	\$17.25	3/22/23	Apr Quarterly 2023
Rally's St. Louis	Food	\$36.82	3/22/23	Apr Quarterly 2023
Jack in the Box St. Louis	Food	\$24.74	3/24/23	Apr Quarterly 2023
Dollar General St. Louis	Unknown	\$6.12	3/27/23	Apr Quarterly 2023
City of St. Louis	Parking	\$4.00	3/27/23	Apr Quarterly 2023
Domino's St. Louis	Food	\$15.33	3/27/23	Apr Quarterly 2023
BP St. Louis	gas station	\$26.14	3/27/23	Apr Quarterly 2023
Domino's St. Louis	Food	\$32.31	3/27/23	Apr Quarterly 2023
Diner's Delight St. Louis	Food	\$34.44	3/27/23	Apr Quarterly 2023
Donovan Harsley	Campaign worker	\$50.00	3/18/23	Apr Quarterly 2023
Monique Singh	Campaign worker	\$50.00	3/18/23	Apr Quarterly 2023
Subway St. Louis	Food	\$13.99	3/29/23	Apr Quarterly 2023
Domino's St. Louis	Food	\$15.33	3/29/23	Apr Quarterly 2023
Burger King St. Louis	Food	\$24.79	3/29/23	Apr Quarterly 2023
Dollar General St. Louis	Unknown	\$27.38	3/30/23	Apr Quarterly 2023
BP St. Louis	gas station	\$22.65	3/30/23	Apr Quarterly 2023
Burger King St. Louis	Food	\$8.33	3/31/23	Apr Quarterly 2023
Rally's St. Louis	Food	\$20.60	3/31/23	Apr Quarterly 2023
Petra Oil St. Louis	gas station	\$28.18	3/31/23	Apr Quarterly 2023
Domino's St. Louis	Food	\$29.24	3/31/23	Apr Quarterly 2023
Donovan Harsley	Campaign worker	\$80.00	4/4/23	Jul Quarterly 2023
BP St. Louis	gas station	\$3.07	4/3/23	Jul Quarterly 2023
BP St. Louis	gas station	\$7.67	4/3/23	Jul Quarterly 2023
Burger King St. Louis	Food	\$14.88	4/3/23	Jul Quarterly 2023
Petra Oil St. Louis	gas station	\$71.12	4/4/23	Jul Quarterly 2023
BP St. Louis	gas station	\$2.65	4/5/23	Jul Quarterly 2023
Wix.com	Website	\$23.00	4/10/23	Jul Quarterly 2023
Enterprise Bank	Account analysis fee	\$6.00	4/19/23	Jul Quarterly 2023
Hummert Graphics	Printing	\$527.09	1/27/17	8 Day Before Special 3/7/17
Wal-Mart Maplewood	Unknown	\$207.82	3/2/17	8 Day Before General 4/4/17
Tim Persons & Associates	Unknown	\$1,000.00	3/7/17	8 Day Before General 4/4/17
Sprint *wireless	Phone service/products	\$153.79	6/27/17	July Quarterly 2017
Wal-Mart Maplewood	Unknown	\$219.23	7/5/17	Oct Quarterly 2017

Speedpay-AmerenUE	Utilities	\$285.99	7/10/17	Oct Quarterly 2017
Wal-Mart Super Center Maplewood	Unknown	\$114.90	10/2/17	Jan Quarterly 2018
Metro PCS	Phone service/products	\$273.80	10/10/17	Jan Quarterly 2018
WestUNAMUE Speedpay	Utilities	\$163.35	2/8/18	Apr Quarterly 2019
ADT Indianapolis, IN	Security	\$119.55	11/13/18	Apr Quarterly 2019
All Mail	Mailing	\$1,155.01	2/6/23	8 Day Before Primary 3/7/23
Tim Person	Political services	\$850.00	2/9/23	8 Day Before Primary 3/7/23
Ebay	Unknown	\$325.76	2/24/23	Apr Quarterly 2023
Diner's Delight St. Louis	Food	\$127.82	2/27/23	Apr Quarterly 2023
Microcenter Brentwood	Computer store	\$261.31	2/27/23	Apr Quarterly 2023
Tim Person	Reimbursement for literature	\$800.00	3/1/23	Apr Quarterly 2023
All Mail	Mailing	\$1,075.31	3/2/23	Apr Quarterly 2023
Metro by T-Mobile	Phone service/products	\$137.00	3/3/23	Apr Quarterly 2023
Diner's Delight St. Louis	Food	\$124.50	3/6/23	Apr Quarterly 2023
Microcenter Brentwood	Computer store	\$199.31	3/6/23	Apr Quarterly 2023
Walmart Granite City, IL	Unknown	\$213.28	3/6/23	Apr Quarterly 2023
Tim Person	Printing	\$1,630.00	3/7/23	Apr Quarterly 2023
Shanea Johnson	Campaign worker	\$500.00	3/20/23	Apr Quarterly 2023
Shanea Johnson	Campaign worker	\$650.00	4/11/23	Jul Quarterly 2023
Shanea Johnson	Campaign worker	\$1,000.00	4/10/23	30 Day After Primary 3/7/23
Tim Person	Political services	\$2,000.00	4/10/23	July Quarterly 2023
Total		\$19,078.23		

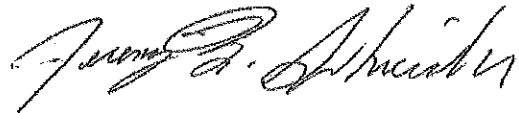
ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.011(9), 130.021.4(1), 130.021.5(6), 130.031, 130.034.1, 130.041.1, 130.046 and 130.050.3, 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 \$46,479.00, 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