

BEFORE THE  
MISSOURI ETHICS COMMISSION

Filed

JAN 13 2026

Missouri Ethics  
Commission

MISSOURI ETHICS )  
COMMISSION, )  
 )  
Petitioner, )  
 ) Case No. 22-0020-A  
v. )  
 )  
JOHN COLLINS-MUHAMMAD, )  
Candidate, )  
 )  
JOHN COLLINS-MUHAMMAD )  
FOR ST. LOUIS, Candidate )  
Committee, )  
 )  
Respondents. )

JOINT FINDINGS OF FACT,  
CONCLUSIONS OF LAW, AND ORDER

The Missouri Ethics Commission ("MEC"), together with John Collins-Muhammad for St. Louis and John Collins-Muhammad ("Respondents"), collectively the "parties" jointly stipulate and consent to action as set forth here (the "agreement").

Respondents acknowledge their right to have this agreement reviewed by counsel. Respondents further acknowledge they have received actual notice of the legal complaint filed by the MEC in this case, have reviewed the contents of the Complaint, and submit to the jurisdiction of the Missouri Ethics Commission.

Respondents further acknowledge they are aware of the various rights and privileges afforded by law, including but not limited to: the right to appear and be represented by counsel at a hearing before the MEC; the right to have all allegations

against Respondents proven upon the record by competent and substantial evidence; the right to cross-examine any witnesses appearing at the hearing against Respondents; the right to present evidence on Respondents' behalf at the hearing; and the right to a decision upon the record of the hearing. Being aware of these rights, Respondents knowingly and voluntarily waive each one of these rights and freely enters into this agreement and agrees to abide by its terms.

## I.

The parties mutually agree and stipulate, subject to adoption by the Missouri Ethics Commission, the following shall constitute the Findings of Fact and Conclusions of Law in this matter:

### **FINDINGS OF FACT**

1. John Collins-Muhammad was successful in his run for City of St. Louis Ward 21 Alderperson in both the April 4, 2017, and April 6, 2021, elections. He resigned from the Board of Aldermen in May of 2022.
2. John Collins-Muhammad for St. Louis is a candidate committee established with the Missouri Ethics Commission on January 6, 2017.
3. John Collins-Muhammad for St. Louis was terminated on June 8, 2022.
4. Pursuant to §§ 105.959 and 105.961, the Commission's staff audited the reports and statements filed with the Commission and reported the findings to the Commission.

5. Based on the audit report, the Commission determined that there were reasonable grounds to believe that violations of the law had occurred, and it therefore authorized a hearing in this matter pursuant to § 105.961.3.

### COUNT I

*Failure to maintain an official depository account and deposit contributions and make expenditures through the committee's account*

6. The last known account, reported on a Statement of Committee Organization received January 20, 2017, was at Regions Bank. The account number provided did not exist and there was no account in the name of the candidate or the committee. The only other account known, in which there was committee activity, was a personal account with Green Dot Corp.

7. Respondents received at least seventy-eight (78) contributions, totaling \$10,812.00, that were not deposited into an official depository account as there was no known account in the name of the committee. Chart 1.

8. Respondents made at least twenty-eight (28) expenditures, totaling \$7,509.34, that did not go through an official depository account as there was no known account in the name of the committee. Chart 2.

### COUNT II

*Contributions received by committee commingled with other funds*

9. Respondents received at least fifty-seven (57) contributions totaling \$9,350.00, received through ActBlue, that were deposited into the candidate's personal account. Chart 3.

### COUNT III

#### *Cash expenditures in excess of limits*

10. Respondents made at least three (3) cash expenditures to campaign workers, totaling \$500.00, each one exceeding the \$50 allowable amount for each cash expenditure made. Chart 4.

### COUNT IV

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

11. Respondents failed to accurately report beginning money on hand totals on the following reports: 2020 January, April and July Quarterly Reports; 40 Day Before and 8 Day Before Reports for the 3/2/21 special charter election; 30 Day After Report for the 4/6/21 general election, and the 2022 April Quarterly Report.

12. Respondents failed to accurately report ending money on hand totals on the following reports: 2019 July Quarterly Report; 2020 January, April and July Quarterly Reports; 40 Day Before and 8 Day Before Reports for the 3/2/21 special charter election; 30 Day After Report for the 4/6/21 general election, and the 2022 April Quarterly Report.

### COUNT V

#### *Failure to timely file campaign finance disclosure reports.*

13. Respondents filed a Limited Activity Statement in lieu of the 2022 January Quarterly Report when a full disclosure report was required.

14. Respondents failed to timely file Statements of Limited Activity for the 2019 April Quarterly Report, 2021 July Quarterly Report and the 8 Day Before Report for the 4/6/21 general election. Respondents also failed to timely file the 2020

January Quarterly Report, and the 8 Day Before and 40 Day Before Reports, both for the 3/2/21 special charter election.

15. Respondents failed to file the 2021 April Quarterly Report.

#### COUNT VI

*Failure to timely and accurately report contributions*

16. Respondents failed to timely report forty-five (45) monetary contributions, totaling \$5,934.00, received through ActBlue. Chart 5.

#### COUNT VII

*Failure to timely and accurately report expenditures*

17. Respondents failed to timely report twelve (12) expenditures, totaling \$428.21. Chart 6.

### CONCLUSIONS OF LAW

#### COUNT I

*Failure to maintain an official depository account and deposit contributions and make expenditures through the committee's account*

18. Pursuant to § 130.021.4(1), "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."

19. Pursuant to § 130.021.4(1), "All contributions which the committee receives in money, checks and other negotiable instruments shall be deposited in a committee's official depository account. Contributions shall not be accepted and

expenditures shall not be made by a committee except by or through an official depository account and the committee treasurer, deputy treasurer or candidate.”

20. Where Respondents failed to maintain a committee's official depository account, received at least seventy-eight (78) contributions and made at least twenty-eight (28) expenditures that did not go through an official depository account, 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

*Contributions received by committee commingled with other funds*

21. “Contributions received by a committee shall not be commingled with any funds of an agent of the committee, a candidate or any other person, except that contributions from a candidate of the candidate's own funds to the person's candidate committee shall be deposited to an official depository account of the person's candidate committee.” § 130.021.4(1).

22. Where Respondents failed to deposit committee funds into the committee's official depository account and commingling committee funds with private funds, 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 III

*Cash expenditures in excess of limits*

23. 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).

24. “A single expenditure of cash shall not exceed fifty dollars.” § 130.031.2.

25. Where Respondents made at least three (3) cash expenditures 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 IV**

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

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

27. 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).

28. Where Respondents failed to accurately report the beginning and ending money on hand on at least eight (8) reports, there is probable cause to believe Respondents violated §§ 130.041.1(2) and 130.041.1(5), giving this Commission the power to act as permitted under § 105.961.

#### **COUNT V**

##### *Failure to timely file campaign finance disclosure reports.*

29. Pursuant to § 130.046.1, 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.

30. Pursuant to § 130.146.5(2),

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.

31. Where Respondents filed a statement of limited activity that should have been a full report, untimely filed six (6) reports, and failed file one (1) report,

there is probable cause to believe Respondents violated § 130.046, giving this Commission the power to act as permitted under § 105.961.

## **COUNT VI**

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

32. 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;
- (b) Total amount of all anonymous contributions accepted;
- (c) Total amount of all monetary contributions received through fund-raising events or activities from participants whose names and addresses were not obtained with such contributions, with an attached statement or copy of the statement describing each fund-raising event as required in subsection 6 of section 130.031;
- (d) Total dollar value of all in-kind contributions received;
- (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).

33. Where Respondents failed to timely report forty-five (45) monetary contributions, there is probable cause to believe Respondents violated § 130.041.1(3), giving this Commission the power to act as permitted under § 105.961.

### **COUNT VII**

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

34. 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;

...

(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).

35. Where Respondents failed to timely report twelve (12) expenditures, there is probable cause to believe Respondents violated § 130.041.1(4), giving this Commission the power to act as permitted under § 105.961.

## II.

Based on the foregoing, the parties mutually agree and stipulate, subject to adoption by the Missouri Ethics Commission, the following shall constitute the Order issued by the Missouri Ethics Commission in this matter:

### **CONSENT ORDER**

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.021.4(1), 130.031.2, 130.041.1, and 130.046, RSMo. and pursuant to §105.961.4, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130.
2. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$19,712, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$1,970 within forty-five days after the date of the Consent Order, the remainder of the fee will be stayed. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.
3. Regardless of the stay in paragraph 2 above, if there is probable cause to believe that any Respondent commits any further violation of the campaign finance laws under Chapter 130, RSMo, within the two-year period from the date of this order, then the Respondent who committed the violation will be required to pay the remainder of the fees. The fee will be due immediately upon final adjudication finding that there was probable cause to believe that such Respondent has committed such a violation.
4. Respondents shall be jointly and severally liable for all fees imposed under this order.

## III.

1. The parties understand the Missouri Ethics Commission will maintain this agreement as an open record of the Commission.

2. This agreement does not bind the Missouri Ethics Commission or restrict the remedies available concerning any violations not expressly detailed here, including any future violations.

3. Each party agrees to pay all their own fees and expenses incurred as a result of this case, its litigation, and/or its disposition.

4. Respondents, together with their heirs, assigns, agents, representatives and attorneys, do hereby waive, release, acquit and forever discharge the Missouri Ethics Commission, the Commission's respective members, employees, agents and attorneys including former members, employees, agents and attorneys, of, or from any liability, claim, actions, causes of action, fees, costs, expenses and compensation, including, but not limited to, any claim for attorney's fees and expenses, whether or not now known or contemplated, including, but not limited to, any claims pursuant to Section 536.087, RSMo, as amended, or any claim arising under 42 U.S.C. § 1983, which now or in the future may be based upon, arise out of, or relate to any of the matters raised in this case or its litigation or from the negotiation or execution of this Joint Stipulation. The parties acknowledge that this paragraph is severable from the remaining portions of this agreement in that it survives in perpetuity even in the event that any court or administrative tribunal deems this agreement or any portion thereof void or unenforceable.

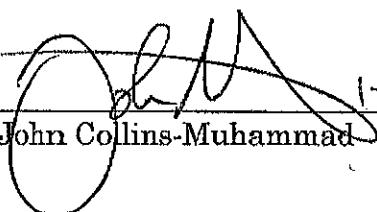
5. This agreement shall become effective immediately upon (1) the signature of all parties; (2) adoption of the Joint Proposed Findings of Fact,

Conclusions of Law by the Missouri Ethics Commission; and (3) issuance of a Final Order by the Commission, without any further action of the parties.

SO AGREED:

RESPONDENTS

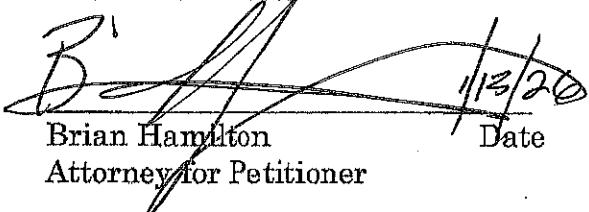
JOHN COLLINS-MUHAMMAD FOR  
ST. LOUIS and JOHN COLLINS-  
MUHAMMAD

 1-13-26  
John Collins-Muhammad Date

MISSOURI ETHICS COMMISSION

 1/13/20  
Stacey Heislen Date

Executive Director

 1/13/20  
Brian Hamilton Date

Attorney for Petitioner

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

SO ORDERED this 20th day of January 2026,



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Jeremy Schneider, Chair  
Missouri Ethics Commission