

BEFORE THE  
MISSOURI ETHICS COMMISSION

Filed

FEB 18 2026

Missouri Ethics  
Commission

MISSOURI ETHICS	)	
COMMISSION,	)	
	)	
Petitioner,	)	
	)	Case No. 24-0003-A
v.	)	
	)	
9 <sup>TH</sup> WARD DEMOCRATS,	)	
Continuing Committee,	)	
	)	
BRYAN WALSH, Treasurer,	)	
	)	
Respondents.	)	

**JOINT FINDINGS OF FACT,  
CONCLUSIONS OF LAW, AND ORDER**

The Missouri Ethics Commission (“MEC”), together with 9<sup>th</sup> Ward Democrats and Bryan Walsh (“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. 9<sup>th</sup> Ward Democrats is a continuing committee established with the Missouri Ethics Commission on September 10, 2017.

2. The current treasurer, Bryan Walsh, served from the committee's inception until February 17, 2020, when Braxton Payne became treasurer. Walsh resumed his role as treasurer on April 29, 2022.

3. The committee terminated on September 10, 2024.

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 timely amend the Statement of Committee Organization to reflect a change in address*

6. Respondents failed to amend the Statement of Committee Organization within twenty days of a change in address.

**COUNT II**

*Failure to timely file campaign finance disclosure reports.*

7. From 2022 through 2024, Respondents failed to timely file eight Statements of Limited Activity in lieu of quarterly reports.

<b>Report Name</b>	<b>Report Year</b>	<b>Due Date</b>	<b>Date Filed</b>
April Quarterly Report - Limited Activity	2022	4/15/22	4/18/22
July Quarterly Report - Limited Activity	2022	7/15/22	7/19/22
October Quarterly Report - Limited Activity	2022	10/17/22	10/18/22
July Quarterly Report - Limited Activity	2023	4/17/23	5/3/23
October Quarterly Report - Limited Activity	2023	10/16/23	10/28/23
January Quarterly Report - Limited Activity	2024	1/15/24	5/30/24
April Quarterly Report - Limited Activity	2024	4/15/24	5/30/24
July Quarterly Report - Limited Activity	2024	7/15/24	7/19/24

**CONCLUSIONS OF LAW**

**COUNT I**

*Failure to timely amend the Statement of Committee Organization to reflect a change in address*

8. "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.

9. The statement of organization shall contain “The name, mailing address and telephone number, if any, of the committee filing the statement of organization.” § 130.021.5(1).

10. Where Respondents failed to amend the Statement of Committee Organization within twenty days of a change in address, there is probable cause to believe Respondents violated § 130.021.7 giving this Commission the power to act as permitted under § 105.961.

## COUNT II

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

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

12. Where Respondents failed to timely file eight quarterly reports, there is probable cause to believe Respondents violated § 130.046, 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 §§ 130.021.7 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 \$2,000, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$200 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.

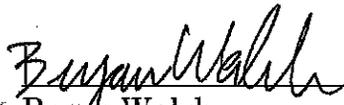
1. The parties understand the Missouri Ethics Commission will maintain this agreement as an open record of the Commission.
2. This agreement does not bind the Missouri Ethics Commission or restrict the remedies available concerning any violations not expressly detailed here, including any future violations.
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  
9<sup>TH</sup> WARD DEMOCRATS  
and BRYAN WALSH

  
Bryan Walsh  
Date 2/11/26

MISSOURI ETHICS COMMISSION

  
Stacey Heislen  
Executive Director  
Date 2/17/2026

  
Brian Hamilton  
Attorney for Petitioner  
Date 2/18/26

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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 February 2026;



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Jeremy Schneider, Chair  
Missouri Ethics Commission