

BEFORE THE MISSOURI ETHICS COMMISSION

MISSOURI ETHICS COMMISSION, Petitioner, v. GAIL GRISWOLD, Respondent. Case No. 24-0044-I

JOINT FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER

The Missouri Ethics Commission ("MEC"), together with Gail Griswold ("Respondent"), collectively the "parties" jointly stipulate and consent to action as set forth here (the "agreement").

Respondent acknowledges her right to have this agreement reviewed by counsel. Respondent further acknowledges she has 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.

Respondent further acknowledge she is 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 Respondent proven upon the record by competent and substantial evidence; the right to cross-examine any witnesses appearing at the hearing against Respondent; the right to present evidence on Respondent's behalf at the hearing; and the right to a decision upon the record of the hearing. Being aware of these rights,

Respondent knowingly and voluntarily waives 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. Gail Griswold was an elected member of the Camdenton R-III School Board from 2021 – 2024.
2. Pursuant to § 105.961, the MEC’s staff investigated a complaint filed with the Commission and reported the investigation findings to the Commission.
3. The Commission determined there were reasonable grounds to believe a violation of the law had occurred and authorized a hearing pursuant to § 105.961.3.
4. Respondent registered her candidate committee, Committee to Elect Gail Griswold with the MEC on March 15, 2021.
5. On January 8, 2024, Respondent registered as a lobbyist with the MEC.
6. As of January 8, 2024, Respondent did not dissolve her candidate committee.

CONCLUSIONS OF LAW

7. Section 105.473.1 provides in part:

Each lobbyist shall, not later than January fifth of each year or five days after beginning any activities as a lobbyist, file standardized registration forms, verified by a written declaration

that it is made under the penalties of perjury, along with a filing fee of ten dollars, with the commission[.]

8. "Any person who registers as a lobbyist shall dissolve his or her candidate committee." § 105.465.1, RSMo.

9. Where Respondent failed to dissolve their candidate committee while being a registered lobbyist, there is probable cause to believe Respondent violated § 105.465.1 giving this Commission the power to act as permitted by § 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 Respondent violated § 105.465.1, RSMo., and pursuant to § 105.961.4, hereby **ORDERS**:

1. Respondent shall comply with all relevant sections of Chapter 105.
2. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondent in the amount of \$1,000, pursuant to Section 105.961.4(6), RSMo. However, if Respondent pays \$100 and dissolves her candidate committee 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 105, 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.

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 of their own fees and expenses incurred as a result of this case, its litigation, and/or its disposition.

4. Respondent, together with his 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:

RESPONDENT GAIL GRISWOLD

MISSOURI ETHICS COMMISSION

Gail Griswold 3/19/26

Gail Griswold

Date

Stacey Heislen 3/19/2026

Stacey Heislen

Date

Executive Director

Brian Hamilton 3/19/26

Brian Hamilton

Date

Attorney for Petitioner

BEFORE THE
MISSOURI ETHICS COMMISSION

Filed

MAR 23 2026

Missouri Ethics
Commission

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) Case No. 24-0044-I
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Respondent.)

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SO ORDERED this 23rd day of March 2026,



Jeremy Schneider, Commissioner
Missouri Ethics Commission