

Filed

MAY 21 2026

**Missouri Ethics
Commission**

**BEFORE THE
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,)	
)	
Petitioner,)	
)	
v.)	Case No. 25-0028-I(A)
)	
PATRICK KILKER, Candidate,)	
)	
and)	
)	
KILKER FOR MAYOR, Candidate Committee,)	
)	
Respondents.)	
)	

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

The Missouri Ethics Commission (“MEC”), together with Patrick Kilker and Kilker for Mayor (“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 legal 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 enter into this agreement and agree 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. The Missouri Ethics Commission (MEC) is an agency of the State of Missouri established pursuant to Section 105.955, RSMo, in part for the purpose of enforcing provisions of Chapter 130.
2. Respondent Patrick Kilker was a successful candidate for Mayor of the City of Frontenac in the April 8, 2025 general election.
3. Respondent Kilker for Mayor is a candidate committee that registered with the MEC on January 13, 2025.

4. Pursuant to §§ 105.957 and 105.961, RSMo, the MEC's staff received a complaint against Respondents. Upon investigation of the allegations, a report was presented to the Commission.

5. The Commission determined there was reasonable grounds to believe violations of Missouri statutes had occurred and authorized a hearing pursuant to § 105.961.3, RSMo.

6. On or about March 10, 2025, Respondents received an in-kind contribution in the form of printed materials valued at \$2,580.20 from the Professional Firefighters of Tri-County PAC.

7. On or about March 26, 2025, Respondents received another in-kind contribution in the form of printed materials valued at \$2,165.02 from the Professional Firefighters of Tri-County PAC.

8. Respondents failed to timely report the receipt of these in-kind contributions on a campaign finance disclosure report.

9. Respondents have subsequently filed amended campaign finance disclosure reports that properly reflect receipt of these in-kind contributions.

CONCLUSIONS OF LAW

10. Section 130.041.1(3)(b), RSMo, requires committees to include the following information in campaign finance disclosure reports: "Total dollar value of all in-kind contributions received[.]"

11. An "in-kind" contribution is a contribution "in a form other than money[.]"
Section 130.011(20), RSMo.

12. There is probable cause to believe Respondents violated § 130.041.1(3)(b), RSMo, by failing to timely report the receipt of these in-kind contributions.

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 § 130.041.1(3), RSMo, and pursuant to § 105.961.4, RSMo, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130.
2. A fee is imposed against Respondents in the amount of \$4,745, pursuant to § 105.961.4(6), RSMo. However, if Respondents pay \$474 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.

The parties understand that the MEC will maintain this agreement as an open record of the Commission. This agreement does not bind the MEC or restrict the remedies available concerning any violations not expressly detailed here, including any future violations. Each party agrees to pay all their own fees and expenses incurred as a result of this case, its litigation, and/or its disposition.

Respondents, together with their heirs, assigns, agents, representatives and attorneys, do hereby waive, release, acquit and forever discharge the MEC, 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 § 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.

Filed

JUN 01 2026

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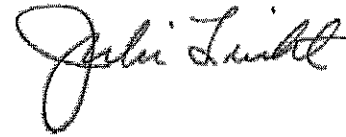
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4. Respondents shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 1st day of June 2026,

A handwritten signature in cursive script, appearing to read "Julie Leicht".

Julie Leicht, Commission Chair
Missouri Ethics Commission