

Filed

JUN 17 2026

Missouri Ethics  
Commission

BEFORE THE  
MISSOURI ETHICS COMMISSION

MISSOURI ETHICS	)
COMMISSION,	)
	)
Petitioner,	)
	)
v.	)
	)
PROGRESS ST. LOUIS ACTION	)
FUND,	)
	)
Respondent.	)

Case No. 21-0037-I, 21-0038-I

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

The Missouri Ethics Commission (“MEC”), together with Progress St. Louis Action Fund (“Respondent”), collectively the “parties” jointly stipulate and consent to action as set forth here (the “agreement”).

Respondent acknowledges its right to have this agreement reviewed by counsel. Respondent further acknowledges it has received actual notice of the first amended legal complaint filed by the MEC in this case, has reviewed the contents of the Complaint, and submits to the jurisdiction of the Missouri Ethics Commission.

Respondent further acknowledges it 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. Respondent Progress St. Louis Action Fund is registered with the State of Missouri as a non-profit corporation.

2. Pursuant to § 105.961, RSMo, the Commission's staff investigated complaints that had been filed with the Commission and reported the findings to the Commission.

3. Based upon the findings in the investigation report, the Commission determined that there were reasonable grounds to believe that violations of the law had occurred and ordered that a hearing in this matter be conducted pursuant to § 105.961.3, RSMo.

4. Petitioner incorporates all other paragraphs of this legal complaint by reference.

**COUNT I**

*Failure to file a statement of committee organization*

5. According to information found on the website maintained by Progress St. Louis, its mission statement reads:

Progress St. Louis was formed in recognition that we need innovative solutions to create lasting, transformative change to ensure that St. Louis is a more equitable place to live, work and be happy. We get there by supporting progressive initiatives and leaders, with an intentional focus on elevating Black leadership, who support transformational change focused on criminal justice reform and abolition, economic equity and fairness, education, access to health care and supporting, expanding and defending democracy.

6. Respondent received funds, totaling at least \$825,000.00, that were used in part for the purpose of supporting or opposing candidates and ballot measures.

Contributor Name	Amount	Date
Campaign for Great Public Schools dba Public School Allies	\$75,000.00	12/7/20
Campaign for Great Public Schools dba Public School Allies	\$150,000.00	3/4/21
Campaign for Great Public Schools dba Public School Allies	\$600,000.00	4/9/21
	<b>\$825,000.00</b>	

7. Respondent made at least \$455,581.96 in payments between December 2000 and March 2022. Attachment 1.

8. On a report filed with the MEC on May 4, 2021, Respondent reported spending \$235,399.43 to support multiple candidates and a ballot measure in the April 6, 2021, election.

9. Progress St. Louis Action Fund's primary or incidental purpose was to attempt to influence the action of voters for or against the nomination or election to public office of one or more candidates or the qualification, passage or defeat of any ballot measure.

10. Respondent did not file a Statement of Committee Organization with the Missouri Ethics Commission.

**COUNT II**

*Failure to timely file campaign finance disclosure reports*

11. Respondent failed to file an 8 Day Before April 6, 2021 Election Report, the 30 Day After April 6, 2021 Election Report and all subsequent quarterly reports.

**COUNT III**

*Failure to timely report contributions*

12. Respondent received funds, totaling at least \$825,000.00, that were used in part for the purpose of supporting or opposing candidates and ballot measures.

<b>Contributor Name</b>	<b>Amount</b>	<b>Date</b>
Campaign for Great Public Schools dba Public School Allies	\$75,000.00	12/7/20
Campaign for Great Public Schools dba Public School Allies	\$150,000.00	3/4/21
Campaign for Great Public Schools dba Public School Allies	\$600,000.00	4/9/21
	<b>\$825,000.00</b>	

**COUNT IV**

*Failure to timely report expenditures*

13. Respondent made at least \$455,581.96 in payments between December 2000 and March 2022. Attachment 1.

**CONCLUSIONS OF LAW**

**COUNT I**

*Failure to file a statement of committee organization*

14. Pursuant to § 130.011(7), RSMo., a committee is “a person or any combination of persons, who accepts contributions or makes expenditures for the primary or incidental purpose of influencing or attempting to influence the action of

voters for or against the nomination or election to public office of one or more candidates or the qualification, passage or defeat of any ballot measure[.]”

15. The statutory definition of a “committee” does not include:

A corporation . . . organized or operated for a primary or principal purpose other than that of influencing or attempting to influence the action of voters for or against the nomination or election to public office of one or more candidates or the qualification, passage or defeat of any ballot measure, and it accepts no contributions, and all expenditures it makes are from its own funds or property obtained in the usual course of business or in any commercial or other transaction and which are not contributions as defined by subdivision (12) of this section[.]

16. Pursuant to § 130.011(12), RSMo, a contribution is any “payment, gift, loan, advance, deposit, or donation of money or anything of value for the purpose of supporting or opposing the nomination or election of any candidate for public office or the qualification, passage or defeat of any ballot measure, or for the support of any committee supporting or opposing candidates or ballot measures.”

17. Pursuant to § 130.011(16), RSMo, an expenditure is any “payment, advance, conveyance, deposit, donation or contribution of money or anything of value for the purpose of supporting or opposing the nomination or election of any candidate for public office or the qualification or passage of any ballot measure or for the support of any committee which in turn supports or opposes any candidate or ballot measure.”

18. Section 130.021(5), RSMo., states that “any person or organization or group of persons which is a committee by virtue of the definitions of committee in section 130.011 . . . shall file a statement of organization with the appropriate officer within twenty days after the person or organization becomes a committee but no later

than the date for filing the first report required pursuant to the provisions of section 130.046.”

19. Where Respondent failed to file a Statement of Committee Organization because Progress St. Louis Action Fund’s primary or incidental purpose was to support or oppose candidates and ballot measures and subsequently, collected contributions and made expenditures in support of candidates and ballot measures, there is probable cause to believe that Respondent violated § 130.021.5, RSMo.

## COUNT II

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

20. 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.

21. Where Respondent failed to timely file campaign finance disclosure reports, there is probable cause to believe Respondent violated § 130.046, RSMo.

### COUNT III

#### *Failure to timely report contributions*

22. 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).

23. Where Respondent failed to timely report at least three monetary contributions, there is probable cause to believe Respondent violated § 130.041.1(3).

COUNT IV

*Failure to timely report expenditures*

24. 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).

25. Where Respondent failed to timely report expenditures, there is probable cause to believe that Respondent violated § 130.041.1(4), RSMo.

WHEREFORE, Petitioner requests this Commission to conduct a hearing pursuant to § 105.961.3, RSMo, issue a determination that there is probable cause to find that Respondent violated §§ 130.021.5, 130.041.1(3-4), and 130.046, RSMo, and take such action or actions authorized by Chapter 105, RSMo, and/or Chapter 130, RSMo, as it may deem to be appropriate.

## 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 §§ 130.021.5, 130.041.1(3-4), 130.046, and 130.047, RSMo. and pursuant to §105.961.4, hereby **ORDERS**:

1. Respondent shall comply with all relevant sections of Chapter 130. This consent order resolves the matters described herein and Respondent is not required to file a statement of committee organization or additional disclosure reports concerning the matters described herein.
2. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondent in the amount of \$236,399, pursuant to Section 105.961.4(6), RSMo. However, if Respondent pays \$23,639 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 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 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 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 their own fees and expenses incurred as a result of this case, its litigation, and/or its disposition.

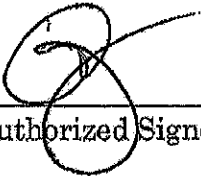
4. Respondent, together with its heirs, assigns, agents, representatives and attorneys, do hereby waives, releases, acquits and forever discharges the Missouri Ethics Commission, the Commission's respective members, employees, agents and attorneys including former members, employees, agents and attorneys, 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:

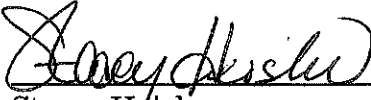
RESPONDENT PROGRESS ST.  
LOUIS ACTION FUND

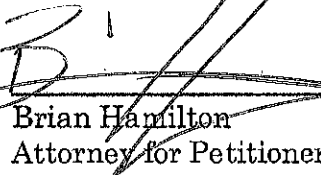
  
\_\_\_\_\_  
Authorized Signer                      6/16/26  
Date

ATTORNEYS FOR RESPONDENT

Robert L Hess II                      6/16/2026  
\_\_\_\_\_  
Jordan T. Ault                      Date  
Robert L. Hess II  
Husch Blackwell, LLP

MISSOURI ETHICS COMMISSION

  
\_\_\_\_\_  
Stacey Heislen                      6/17/2026  
Executive Director                      Date

  
\_\_\_\_\_  
Brian Hamilton                      6/17/26  
Attorney for Petitioner                      Date

**Attachment 1**

<b>Expenditure Name</b>	<b>Purpose</b>	<b>Amount</b>	<b>Date</b>
Harland Clarke	Checks	\$25.40	unknown
Alltru Credit Union	Statement fee	\$1.50	unknown
Alltru Credit Union	Statement fee	\$1.50	unknown
Alltru Credit Union	Statement fee	\$1.50	unknown
Squarespace		\$20.00	unknown
Alltru Credit Union	wire out fee	\$25.00	unknown
Alltru Credit Union	Statement fee	\$1.50	unknown
Google Gsuite		\$4.00	unknown
Google Gsuite		\$14.40	unknown
Google Gsuite		\$36.00	unknown
Google Gsuite		\$12.00	unknown
Google Gsuite		\$12.00	unknown
Google Gsuite		\$36.00	unknown
Google Gsuite		\$36.00	unknown
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Google Gsuite		\$36.00	unknown
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Google Gsuite		\$36.00	unknown
Uber		\$36.97	unknown
Uber		\$48.39	unknown
Google Gsuite		\$12.00	unknown
Google Gsuite		\$36.00	unknown
WPY*Mardi Gras Inc		\$52.00	unknown
Google Gsuite		\$12.00	unknown
Google Gsuite		\$36.00	unknown
Amtrak.com		\$70.00	unknown
unknown		\$5,000.00	12/24/20
unknown		\$5,000.00	12/30/20
Maxwell @ Co LLC	Project management	\$6,000.00	1/4/21
unknown		\$1,800.00	1/25/21
Blackrock Consulting	General consulting	\$5,000.00	1/29/21
Maxwell @ Co LLC	Project management	\$5,000.00	1/28/21
Maxwell @ Co LLC	Project management	\$5,000.00	2/16/21
Squarespace		\$172.80	3/12/21
Show-Me Integrity		\$25,000.00	3/19/21
Pre-Sort Inc. St. Louis		\$1,104.62	3/24/21

Pre-Sort Inc. St. Louis		\$2,648.25	3/24/21
Pre-Sort Inc. St. Louis		\$1,671.06	3/24/21
Rye-Jol Limited Company	Progress STL website design	\$3,800.00	2/26/21
Fuse	Educational purposes	\$50,000.00	3/29/21
MACT-PAC		\$4,500.00	3/25/21
SKDKNICKERBOCKER LLC		\$247,237.30	4/13/21
Carr Marketing, Inc.	Data analytics	\$15,086.59	4/19/21
Show-Me Integrity		\$25,000.00	5/20/21
TST* Little Fox St. Louis MO		\$199.93	6/26/21
unknown		\$720.00	8/4/21
unknown		\$9,181.28	8/12/21
Withdrawal		\$1,000.00	9/1/21
Withdrawal		\$2,000.00	9/29/21
Withdrawal		\$2,000.00	10/29/21
Blackrock Consulting	General consulting	\$10,000.00	12/2/21
Withdrawal		\$2,000.00	12/2/21
Withdrawal		\$2,000.00	1/3/22
Faegre & Drinker	Legal	\$258.40	12/13/21
Husch Blackwell	Legal	\$10,944.00	12/29/21
Withdrawal		\$2,000.00	2/1/22
WPY*Mardi Gras Inc		\$831.92	2/25/22
WPY*Mardi Gras Inc		\$155.99	2/25/22
American Airlines		\$296.60	3/5/22
Southwest Airlines		\$296.98	3/6/22
Kimpton Hotel Marlowe Cambridge, MA		\$1,462.08	3/11/22
Squarespace		\$216.00	3/12/22
GoFundMe Held the Stark F...Redwood City, CA	Donation	\$216.00	3/13/22
<b>Total</b>		<b>\$455,581.96</b>	

Filed

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Missouri Ethics  
Commission

BEFORE THE  
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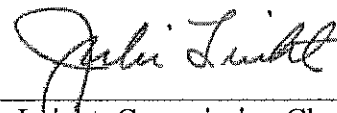
CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe Respondent violated §§ 130.021.5, 130.041.1(3-4), 130.046, and 130.047, RSMo. and pursuant to §105.961.4, hereby

ORDERS:

1. Respondent shall comply with all relevant sections of Chapter 130. This consent order resolves the matters described herein and Respondent is not required to file a statement of committee organization or additional disclosure reports concerning the matters described herein.
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3. Regardless of the stay in paragraph 2 above, if there is probable cause to believe that 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 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 Respondent has committed such a violation.

SO ORDERED this 23rd day of June 2026,



Julie Leicht, Commission Chair  
Missouri Ethics Commission