

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

JUL 09 2026

**Missouri Ethics
Commission**

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 25-0002-A
	)	
MICHEAL L. DICKENS, Candidate	)	
and DICKENS FOR WARD 6, Candidate	)	
Committee,	)	
	)	
Respondents.	)	

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

The Missouri Ethics Commission ("MEC"), together with Micheal L. Dickens and his candidate committee, Dickens for Ward 6 ("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 themselves 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 § 105.955, RSMo, in part for the purpose of enforcing provisions of Chapter 130, RSMo.

2. Micheal L. Dickens was elected as a Ward 6 Councilperson for the City of Rolla in the April 7, 2025 election.

3. Dickens for Ward 6 is a candidate committee that registered with the MEC on February 4, 2025.

4. Pursuant to § 105.959, RSMo, the MEC's staff undertook an audit of the reports and statements that had been filed with the MEC and reported the audit findings to the Commission.

5. The audit encompassed activity from February 1, 2025, through January 28, 2026.

6. The Commission determined there were reasonable grounds to believe violations of the law had occurred and authorized a hearing pursuant to § 105.961, RSMo.

COUNT I

Conversion of Contributions to Personal Use

7. Between February 28, 2025, and May 5, 2025, Respondent Dickens used a total of \$631.74 in contributions for personal use by making the following withdrawals from the committee's official depository account:

Date	Amount	Payee
02/28/2025	\$20.00	Micheal L. Dickens (ATM withdrawal)
02/28/2025	\$24.23	Uber Eats
03/03/2025	\$25.25	Uber Eats
03/03/2025	\$25.87	Uber Eats
03/04/2025	\$23.09	Uber Eats
03/05/2025	\$22.37	Uber Eats
03/07/2025	\$20.14	Uber Eats
03/13/2025	\$21.18	Uber Eats
03/13/2025	\$100.00	Micheal L. Dickens (funds transfer)
03/13/2025	\$150.00	Micheal L. Dickens (funds transfer)
03/16/2025	\$50.00	Micheal L. Dickens (funds transfer)
03/18/2025	\$75.00	Micheal L. Dickens (funds transfer)
04/07/2025	\$.90	Micheal L. Dickens (funds transfer)
05/01/2025	\$47.17	Fridas Cantina
05/05/2025	\$27.44	Uber Eats

COUNT II

Commingling

8. On April 29, 2025, Respondents deposited into the committee's official depository account a \$75.00 check that was payable to Micheal Dickens and which was not a contribution

COUNT III

Failure to Accurately Report Beginning and Ending Money on Hand

9. Respondents failed to disclose the personal use of contributions in campaign finance disclosure reports.

10. As a result, Respondents incorrectly stated the amount of beginning money on hand and/or the amount of ending money on hand in the following campaign finance disclosure reports:

- April 2025 40 Day Before General;
- April 2025 8 Day Before General;
- April 2025 Amended 30 Day After General;
- August 2025 Termination Report.

COUNT IV

Failure to Report Contributions and Miscellaneous Receipts

11. Respondents failed to report the following contributions:

- \$20.00 received on or about February 23, 2025, from Marg Olson;
- \$150.00 received on or about February 24, 2025, from Future for

Phelps.

12. Respondents failed to report the following miscellaneous receipt: \$7.29 received as a credit from Amazon on or about February 14, 2025.

COUNT V

Failure to Report Expenditures

13. Respondents failed to report the following expenditures:

Date	Amount	Vendor / Purpose
	\$8.31	ActBlue / fees incurred between 02/01 and 02/12
02/23/2025	\$.79	ActBlue / fees
	\$1.13	CashApp / fees incurred between 03/13 and 03/17
02/28/2025	\$39.39	Uber Eats / snacks, campaign supplies including service fee, delivery fee, and tip
03/03/2025	\$25.85	Uber Eats / snacks, campaign supplies including service fee, delivery fee, and tip
03/03/2025	\$29.99	Adobe / service
03/06/2025	\$16.41	Uber Eats / campaign supplies including service fee, delivery fee, and tip
03/13/2025	\$38.96	Uber Eats / campaign supplies including service fee, delivery fee, and tip
03/13/2025	\$30.00	Phelps County Bank / overdraft fee
03/14/2025	\$30.00	Phelps County Bank / overdraft fee
03/17/2025	\$30.00	Phelps County Bank / overdraft fee
03/19/2025	\$30.00	Phelps County Bank / overdraft fee

CONCLUSIONS OF LAW

Count I

Conversion of Contributions to Personal Use

14. Contributions are defined as "a 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[.]” Section 130.011(12), RSMo.

15. Contributions must be deposited into the committee’s official depository account. Section 130.021.4, RSMo.

16. “Contributions may be used for any purpose allowed by law including, but not limited to:

- (1) Any ordinary expenses incurred relating to a campaign;
- (2) Any ordinary and necessary expenses incurred in connection with the duties of a holder of elective office;
- (3) Any expenses associated with the duties of candidacy or of elective office pertaining to the entertaining of or providing social courtesies to constituents, professional associations, or other holders of elective office;
- (4) The return of any contribution to the person who made the contribution to the candidate or holder of elective office;
- (5) To contribute to a political organization or candidate committee as allowed by law;
- (6) To establish a new committee as defined by this chapter;
- (7) To make an unconditional gift which is fully vested to any charitable, fraternal or civic organizations or other associations formed to provide for some good in the order of benevolence, if such candidate, former candidate or holder of elective office or such person's immediate family gain no direct financial benefit from the unconditional gift[.]”

Section 130.034.2, RSMo.

17. “Contributions . . . received by any committee shall not be converted to any personal use.” Section 130.034.1, RSMo.

18. There is probable cause to believe Respondent Micheal L. Dickens violated

§ 130.034.1, RSMo, by converting contributions to personal use.

COUNT II

Commingling

19. "Contributions received by a committee shall not be commingled with any funds of an agent of the committee, a candidate or any other person[.]" Section 130.021.4, RSMo.

20. There is probable cause to believe Respondents violated § 130.021.4, RSMo, by commingling personal funds with contributions in the committee's official depository account.

COUNT III

Failure to Accurately Report Beginning and Ending Money on Hand

21. Section 130.041.1, RSMo, requires committees to include in campaign finance disclosure reports the amount of money on hand at the beginning of the reporting period and the amount of money on hand at the end of the reporting period.

22. There is probable cause to believe Respondents violated § 130.041.1, RSMo, by incorrectly reporting the amount of beginning and/or ending money on hand.

COUNT IV

Failure to Report Contributions and Miscellaneous Receipts

23. Committees are required to accurately report all contributions and all receipts received during the reporting period. Section 130.041.1(3), RSMo.

24. There is probable cause to believe that Respondents violated § 130.041.1(3), RSMo, by failing to report all contributions and miscellaneous receipts.

COUNT V

Failure to Report Expenditures

25. Committees are required to accurately report all expenditures made during the reporting period. Expenditures that are less than \$100.00 each may be grouped and reported by category. Section 130.041.1(4), RSMo.

26. There is probable cause to believe that Respondents violated § 130.041.1(4), RSMo, by failing to report expenditures.

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 the following provisions of as detailed in these conclusions of law, and pursuant to § 105.961.4, RSMo, hereby **ORDERS**:

1. Respondents shall comply with all provisions of Chapter 130, RSMo.
2. Respondents shall file amended reports as necessary to bring them into compliance with Chapter 130, RSMo.
3. A fee is imposed against Respondents in the amount of \$2,088; however, if, within 45 days of the date of the consent order, Respondents pay \$775 and file all necessary amendments, the remainder of the fee will be stayed.
4. Respondents are jointly and severally liable for the payment of this fee.
5. Regardless of the stay in paragraph 3, if there is probable cause to believe that any Respondent has committed any further violation of the campaign finance laws in Chapter 130, RSMo, within the two-year period from the date of this order, then the Respondent who committed the new violation will be required to pay the remainder of the fee. That remainder will be due immediately upon final adjudication of finding probable cause.
6. Fees will be paid by check or money order made payable to the Missouri Ethics Commission.

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.

This agreement shall become effective immediately upon (1) the signature of all

parties; (2) the adoption of the Joint Proposed Findings of Fact, Conclusions of Law by the Missouri Ethics Commission; and (3) the issuance of a Final Order by the Commission, without any further action of the parties.

SO AGREED:

RESPONDENTS

PETITIONER

DICKENS FOR WARD 6

MISSOURI ETHICS COMMISSION

<u>Micheal L. Dickens</u>	<u>7-3-2020</u>	<u>Stacey Heislen</u>	<u>7/9/2020</u>
By Micheal L. Dickens	Date	Stacey Heislen	Date
Candidate		Executive Director	

MICHEAL L. DICKENS

<u>Micheal L. Dickens</u>	<u>7-3-2020</u>	<u>Laura E. Elsbury</u>	<u></u>
Micheal L. Dickens	Date	Laura E. Elsbury	Date
		Attorney for Petitioner	

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Petitioner,

v.

MICHEAL L. DICKENS and
DICKENS FOR WARD 6,

Respondents.

Case No. 25-0002-A

CONSENT ORDER

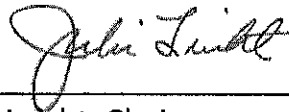
The Missouri Ethics Commission finds probable cause to believe Respondents violated the following provisions: §§ 130.021.4, 130.034.1, and 130.041.1, RSMo, and pursuant to § 105.961.4, RSMo, hereby **ORDERS**:

1. Respondents shall comply with all provisions of Chapter 130, RSMo.
2. Respondents shall file amended reports as necessary to bring them into compliance with Chapter 130, RSMo.
3. A fee is imposed against Respondents in the amount of \$2,088; however, if, within 45 days of the date of the consent order, Respondents pay \$775 and file all necessary amendments, the remainder of the fee will be stayed.
4. Respondents are jointly and severally liable for the payment of this fee.
5. Regardless of the stay in paragraph 3, if there is probable cause to believe that any Respondent has committed any further violation of the campaign finance laws in Chapter 130, RSMo, within the two-year period from the date of this order, then the Respondent who committed the new violation will be required to

pay the remainder of the fee. That remainder will be due immediately upon final adjudication of finding probable cause.

6. Fees will be paid by check or money order made payable to the Missouri Ethics Commission.

SO ORDERED, this 10th day of July, 2026.

A handwritten signature in cursive script, appearing to read "Julie Leicht", is positioned above a horizontal line.

Julie Leicht, Chair
Missouri Ethics Commission