

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

JUL 14 2026

**Missouri Ethics
Commission**

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 25-0001-A
	)	
DIONNE D. PEEPLES-JONES, Candidate	)	
and COMMITTEE TO ELECT DIONNE	)	
PEEPLES-JONES, Candidate Committee,	)	
	)	
Respondents.	)	

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

The Missouri Ethics Commission ("MEC"), together with Dionne D. Peeples-Jones and her candidate committee, Committee to Elect Dionne Peeples-Jones ("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. Dionne D. Peeples-Jones serves as Ward 1 Alderwoman in the City of Pine Lawn.
3. Respondent Peeples-Jones was first elected in 2021; she was reelected in 2024.
4. The Committee to Elect Dionne Peeples-Jones is a candidate committee that registered with the MEC on February 17, 2021.

5. 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 those audit findings to the Commission.

6. The audit encompassed activity from April 1, 2022, through December 1, 2025.

7. 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

Failure to Report Change in Official Depository Account

8. Respondents filed a Statement of Committee Organization February 17, 2021, disclosing that the official depository account ending in 0698 had been established at Bank of America.

9. The Bank of America account ending in 0698 closed on September 22, 2022.

10. Respondents did not file an amended Statement of Committee Organization to report this change.

11. Respondents opened a new official depository account ending in 0598 at Bank of America on April 17, 2023.

12. Respondents did not file an amended Statement of Committee Organization to report this change.

COUNT II

Failure to Maintain a Proper Official Depository Account

13. The official depository account ending in 0698 was a personal checking account held jointly by Respondent Peeples-Jones and her mother.

14. The official depository account ending in 0698 closed on September 22, 2022.

15. Respondents opened a new official depository account ending in 0958 on April 17, 2023.

16. The official depository account ending in 0958 was a savings account, not a checking account.

17. On April 22, 2025, Respondents established a new official depository account ending in 6741.

18. The official depository account ending in 6741 is a personal account in the name of Respondent Peeples-Jones and it is not the name of the committee.

COUNT III

Acceptance of Anonymous Contributions

19. On the Amended April 2023 Quarterly Campaign Finance Report, Respondents reported receipt of two anonymous contributions, both exceeding \$25.00:

- On March 15, 2023, Respondents accepted an anonymous contribution of \$100.00;
- On March 20, 2023, Respondents accepted an anonymous contribution of \$200.00.

COUNT IV

Failure to Accurately Report Beginning and Ending Money on Hand

20. 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:

- Amended April 2023 Quarterly Report;
- April 2025 Quarterly Report;
- July 2025 Quarterly Report;
- October 2025 Quarterly Report.

COUNT V

Failure to File Full Disclosure Reports

21. Respondents filed Statements of Limited Activity for the following reporting periods even though the aggregate contributions or expenditures exceeded \$500.00:

- October 2023 Quarterly Report;
- January 2024 Quarterly Report;
- July 2024 Quarterly Report;
- October 2024 Quarterly Report;
- 40 Day Before General Election Report of April 8, 2025.

COUNT VI

Failure to Timely and Accurately File Campaign Finance Disclosure Reports

22. Respondents failed to timely file numerous reports during the audit period.

April 2022 Quarterly Report	14 days late
July 2022 Quarterly Report	17 days late
October 2022 Quarterly Report	15 days late
July 2023 Quarterly Report	7 days late
October 2023 Quarterly Report	14 days late
January 2024 Quarterly Report	3 days late
April 2024 Quarterly Report	34 days late
July 2024 Quarterly Report	3 days late
30 Day After General Election of April 8, 2025	2 days late

23. Respondents entered incorrect start dates and included activity outside of the statutory reporting periods on the following campaign finance disclosure reports:

- April 2023 Quarterly;
- April 2025 Quarterly;
- July 2025 Quarterly.

24. Respondents failed to file an 8 Day Before General Election Report on April 4, 2023, even though the committee had made contributions and expenditures in support of Respondent Peeples-Jones' candidacy.

25. In the April 2023 Quarterly Report, Respondent incorrectly reported a reimbursement as a loan received.

COUNT VII

Failure to Timely and Accurately Report Contributions

26. Respondents failed to report the following monetary contributions:

Date	Amount	Contributor
04/01/2022	\$25.00	Dionne Jones
04/17/2023	\$100.00	Dionne Jones
08/08/2024	\$500.00	Dionne Jones

27. Respondents failed to report the following in-kind contributions:

Date	Amount	Contributor
10/28/2022	\$1,710.00	Dionne Jones
11/14/2022	\$300.00	Dionne Jones
11/17/2023	\$200.00	Dionne Jones
09/16/2024	\$125.98	Dionne Jones
10/16/2024	\$125.98	Dionne Jones
11/16/2024	\$125.98	Dionne Jones
11/24/2024	\$180.00	Dionne Jones
12/16/2024	\$125.98	Dionne Jones
01/16/2025	\$125.98	Dionne Jones
02/12/2025	\$150.00	Dionne Jones
02/16/2025	\$125.98	Dionne Jones
03/16/2025	\$125.98	Dionne Jones

28. Respondents also failed to report a total of \$2,754.50 in in-kind contributions that were less than \$100.00 each.

29. Respondents failed to report a miscellaneous receipt of \$14.03 after depositing this amount to close the official depository account in September of 2022.

30. Respondents inaccurately reported 45 monetary and in-kind contributions:

- Some contributions were reported more than one time;

- Some contributions were incorrectly aggregated;
- Some contributions were incorrectly reported as expenditures.

COUNT VIII

Failure to Timely and Accurately Report Expenditures

31. Respondents failed to report the following monetary expenditures:

Date	Amount	Vendor / Purpose
	\$19.80	Bank of America / account fees between 04/29/22 and 07/26/22
04/04/2022	\$5.00	ActBlue / unknown
04/28/2022	\$5.00	ActBlue / unknown
04/26/2023	\$250.00	Dionne Jones / reimbursement
07/26/2023	\$100.00	Dionne Jones / reimbursement
07/26/2023	\$50.00	Dionne Jones / reimbursement
06/10/2024	\$49.41	Dionne Jones / reimbursement
06/10/2024	\$200.00	Dionne Jones / reimbursement
06/13/2024	\$300.00	Dionne Jones / reimbursement

32. Respondents failed to report the following incurred expenditures:¹

Date	Amount	Vendor / Purpose
02/28/2023	\$25.00	Amazon / supplies
12/05/2023	\$15.94	Amazon / supplies
12/26/2023	\$83.90	Dollar Tree / gift cards and fees

33. Respondents incorrectly disclosed a \$49.73 expenditure on the Amended April 2023 Quarterly Report; the expenditure should have been reported on the 8 Day

¹ An example of an “incurred expenditure” is a purchase made by credit card or the ordering of materials or services when the payment is to be made later in a different reporting period. Such expenses should be reported as an expenditure when incurred, and the subsequent payment should be reported as a payment on the debt. See Advisory Opinion 2007.11.CF.013.

Before General Election Report.

34. Respondents incorrectly disclosed a \$507.00 expenditure on the April 2023 Quarterly Report by identifying it as a loan and monetary non-itemized expenditure; the expenditure should have been reported as an incurred expenditure on the 8 Day Before General Election Report.

CONCLUSIONS OF LAW

Count I

Failure to Report Change in Official Depository Account

35. Pursuant to § 130.021.5(6), RSMo, committees are required to disclose in a Statement of Committee Organization:

The name and mailing address of its depository, the name and account number of each account the committee has in the depository, and the account number and issuer of any credit card in the committee's name[.]

36. If this depository information changes, committees are required to file an amended Statement of Committee Organization "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." Section 130.021.7. RSMo.

37. There is probable cause to believe Respondents violated § 130.021.7, RSMo, by failing to file amended Statements of Committee Organization.

COUNT II

Failure to Maintain a Proper Official Depository Account

38. Section 130.021.4(1), RSMo, details the requirements for establishing and maintaining an official depository account:

- Every committee must establish and thereafter maintain at least one official depository account;
- Official depository accounts must be in the name of the committee;
- Official depository accounts must be established at a federally or state-chartered bank, a federally or state-chartered savings and loan association, or a federally or state-chartered credit union;
- Official depository accounts must be a checking account or some type of negotiable draft or negotiable order or withdrawal account;

39. The official fund depository must be a type of financial institution that provides a record of deposits, cancelled checks of other cancelled instruments of withdrawal and evidencing each transaction by maintaining copies with this state of such instruments and other transactions. Section 130.021.4(1), RSMo.

40. There is probable cause to believe Respondents violated § 130.021.4(1), RSMo, by failing to establish and maintain a proper official depository account.

COUNT III

Acceptance of Anonymous Contributions

41. Committees are required to accurately disclose the source of all contributions. Section 130.031.3, RSMo, states:

No contribution shall be made or accepted and no expenditure shall be made or incurred, directly or indirectly, in a fictitious name, in the name of another person, or by or through another person in such a manner as to conceal the identity of the actual source of the contribution or the actual recipient and purpose of the expenditure. Any person who receives contributions for a committee shall disclose to that committee's treasurer, deputy treasurer or candidate the recipient's own name and address and the name and address of the actual source of each contribution such person has received for that committee. Any person who makes expenditures for a committee shall disclose to that committee's treasurer, deputy treasurer or candidate such person's own name and address, the name and address of each person to whom an expenditure has been made and the amount and purpose of the expenditures the person has made for that committee.

42. However, there are exceptions for anonymous contributions of \$25 or less:

No anonymous contribution in excess of twenty-five dollars shall be made by any person, and no anonymous contributions in excess of twenty-five dollars shall be accepted by any candidate or committee. If any anonymous contribution in excess of twenty-five dollars is received, it shall be returned immediately to the contributor if his or her identity can be ascertained, and if the contributor's identity cannot be ascertained, the candidate or the committee treasurer shall immediately transmit that portion of the contribution which exceeds twenty-five dollars to the state treasurer and it shall escheat to the state.

Section 130.110(3). RSMo.

43. There is probable cause to believe Respondents violated § 130.031.3, RSMo, and § 130.110(3), RSMo, by accepting anonymous contributions that exceeded \$25 each.

COUNT IV

Failure to Accurately Report Beginning and Ending Money on Hand

44. 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.

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

COUNT V

Failure to File Full Disclosure Reports

46. Section 130.046.1(3), RSMo, requires all committees to file campaign finance disclosure reports “[n]ot later than the fifteenth day following the close of each calendar quarter.”

47. Additionally, “if any committee accepts contributions or makes expenditures in support of or in opposition to a ballot measure or a candidate, and the report required by this subsection for the most recent calendar quarter is filed prior to the fortieth day before the election on the measure or candidate, the committee shall file an additional disclosure report not later than the fortieth day before the election for the period closing on the forty-fifth day before the election.” Section 130.046.1(3), RSMo.

48. However, if the committee’s aggregate contributions and expenditures do not exceed \$500.00 during the quarter, the committee may instead file a statement of limited activity. Section 130.046.3, RSMo; Section 130.046.5(2), RSMo.

49. There is probable cause to believe Respondents violated § 130.046.1, RSMo, by filing statements of limited activity when full campaign finance disclosure reports were

required.

COUNT VI

Failure to Timely and Accurately File Campaign Finance Disclosure Reports

50. Section 130.046.1, RSMo, prescribes the deadlines for filing campaign finance disclosure reports: Quarterly reports must be filed 15 days after the close of the quarter by all committees and successful candidates must file a report 30 days after an election if the candidate committee has received contributions or made expenditures for that election.

51. Section 130.046.3, RSMo, specifies that “[t]he reporting dates and periods covered for . . . quarterly reports shall not be later than the fifteenth day of January, April, July and October for periods closing on the thirty-first day of December, the thirty-first day of March, the thirtieth day of June and the thirtieth day of September.”

52. Committees are also required to file a disclosure report “[n]ot 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 contributions or expenditure either in support or opposition to any candidate or ballot measure[.]” Section 130.046.1(1), RSMo.

53. Committees are required to report “[t]he total amount of outstanding indebtedness as of the closing date of the reporting period covered[.]” Section 130.041.1(6), RSMo.

54. There is probable cause to believe that Respondents violated § 130.046,

RSMo, and § 130.041.1, RSMo, by failing to timely and accurately file all required campaign finance disclosure reports.

COUNT VII

Failure to Timely and Accurately Report Contributions

55. Committees are required to accurately report all monetary and in-kind contributions received during the reporting period. Contributions that are \$100.00 or less need only be reported in the aggregate. Section 130.041.1(3), RSMo.

56. There is probable cause to believe that Respondents violated § 130.041.1(3), RSMo, by failing to timely and accurately report contributions.

COUNT VIII

Failure to Timely and Accurately Report Expenditures

57. Committees are required to accurately report all expenditures made during the reporting period. Expenditures that are \$100.00 or less can be combined by category. Section 130.041.1(4), RSMo.

58. There is probable cause to believe that Respondents violated § 130.046.1(4), RSMo, by failing to timely and accurately 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 provisions of Chapter 130, RSMo, as alleged in the complaint, 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 \$13,205; however, if, within 45 days of the date of the consent order, Respondents pay \$1,320 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.

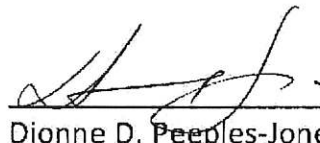
SO AGREED:

RESPONDENTS

COMMITTEE TO ELECT DIONNE
PEEPLS-JONES

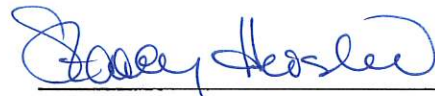
 7-9-26
By Dionne D. Peoples-Jones Date
Candidate

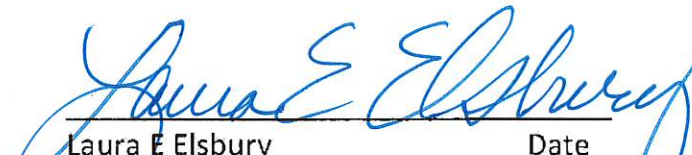
DIONNE D. PEEPLES-JONES

 7-9-26
Dionne D. Peoples-Jones Date

PETITIONER

MISSOURI ETHICS COMMISSION

 7/13/2026
Stacey Heislen Date
Executive Director

 Date
Laura E. Elsbury
Attorney for Petitioner 7-14-2026

BEFORE THE
MISSOURI ETHICS COMMISSION

Filed
JUL 18 2026

MISSOURI ETHICS COMMISSION,	)	Missouri Ethics Commission
	)	
Petitioner,	)	
	)	
v.	)	Case No. 25-0001-A
	)	
DIONNE D. PEEPLES-JONES and	)	
COMMITTEE TO ELECT DIONNE PEEPLES-JONES,	)	
	)	
Respondents.	)	

CONSENT ORDER

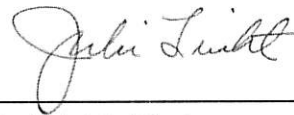
The Missouri Ethics Commission finds probable cause to believe Respondents violated provisions of Chapter 130, RSMo, as alleged in the complaint, and pursuant to § 105.961.4, RSMo, hereby **ORDERS**:

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 \$13,205; however, if, within 45 days of the date of the consent order, Respondents pay \$1,320 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 18th day of July, 2026.

A handwritten signature in cursive script, reading "Julie Leicht".

Julie Leicht, Chair
Missouri Ethics Commission