

Filed

JUL 21 2026

Missouri Ethics
Commission

BEFORE THE
MISSOURI ETHICS COMMISSION

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 24-0004-A
	)	
SOUTH COUNTY FORWARD, Continuing	)	
Committee and ROBERT SPENCE, Treasurer,	)	
	)	
Respondents.	)	

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

The Missouri Ethics Commission ("MEC"), together with the South County Forward committee and its Treasurer, Robert Spence ("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 is an agency of the State of Missouri established pursuant to § 105.955, RSMo, in part for the purpose of enforcing the provisions of Chapter 130, RSMo.
2. South County Forward was a continuing committee established with the Missouri Ethics Commission on January 31, 2020.
3. Robert Spence has been the treasurer since the committee's inception.
4. The committee terminated on August 14, 2024.
5. Pursuant to §§ 105.959 and 105.961, the Commission's staff audited the reports and statements filed with the Commission and reported the findings to the Commission.

6. Based on the audit report, the Commission determined that there were reasonable grounds to believe that violations of the law had occurred, and it therefore authorized a hearing in this matter pursuant to § 105.961.3, RSMo.

Count I

*Failure to timely amend the Statement of Committee Organization
to reflect a change in address*

7. Respondents failed to amend the Statement of Committee Organization within twenty days of a change in address.

COUNT II

*Failure to maintain an official depository account and amend the
Statement of Committee Organization*

8. On or about February 11, 2021, the committee's bank account was closed.

9. Respondents did not amend the Statement of Committee Organization to reflect the changes in the committee's account.

COUNT III

Failure to timely file campaign finance disclosure reports

10. From 2021 through 2024, Respondents failed to timely file ten Statements of Limited Activity in lieu of quarterly reports. Respondents also failed to timely file a Statement of Limited Activity for the 8 Day Before Report for the August 2, 2022 primary election.

Report Name	Report Year	Due Date	Date Filed
July Quarterly Report - Limited Activity	2021	7/15/21	11/9/21
October Quarterly Report - Limited Activity	2021	10/15/21	11/9/21
January Quarterly Report - Limited Activity	2022	1/17/22	1/20/22
8 Day Before Primary Election 8/2/22 - Limited Activity	2022	7/25/22	8/5/22
April Quarterly Report - Limited Activity	2023	4/17/23	9/11/23
July Quarterly Report - Limited Activity	2023	7/17/23	9/11/23
October Quarterly Report - Limited Activity	2023	10/16/23	7/26/24
January Quarterly Report - Limited Activity	2024	1/15/24	7/26/24
April Quarterly Report - Limited Activity	2024	4/15/24	7/26/24
July Quarterly Report - Limited Activity	2024	7/15/24	7/26/24

CONCLUSIONS OF LAW

Count I

Failure to timely amend the Statement of Committee Organization to reflect a change in address

1. "A committee which has filed a statement of organization and has not terminated shall not be required to file another statement of organization, except that when there is a change in any of the information previously reported as required by subdivisions (1) to (8) of subsection 5 of this section an amended statement of

organization shall be filed 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 by section 130.046." Section 130.021.7, RSMo.

2. The statement of organization shall contain "The name, mailing address and telephone number, if any, of the committee filing the statement of organization." Section 130.021.5(1), RSMo.

3. There is probable cause to believe Respondents violated § 130.021, RSMo by failing to timely file an amended Statement of Committee Organization to reflect a change in address.

COUNT II

Failure to maintain an official depository account and to amend the Statement of Committee Organization

4. Pursuant to Section 130.021.4(1), RSMo, "every committee shall have a single official fund depository within this state which shall be a federally or state-chartered bank, a federally or state-chartered savings and loan association, or a federally or state-chartered credit union in which the committee shall open and thereafter maintain at least one official depository account in its own name."

5. "A committee which has filed a statement of organization and has not terminated shall not be required to file another statement of organization, except that when there is a change in any of the information previously reported as required by subdivisions (1) to (8) of subsection 5 of this section an amended statement of

organization shall be filed 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 by section 130.046." Section 130.021.7, RSMo.

6. The statement of organization shall contain "the name and mailing address of its depository, and the name and account number of each account the committee has in the depository." Secion 130.021.5(6), RSMo.

7. There is probable cause to believe Respondents violated § 130.021, RSMo by failing to timely file an amended Statement of Committee Organization to reflect a change in bank account.

COUNT III

Failure to timely file campaign finance disclosure reports

8. Pursuant to § 130.046.1, RSMo, 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;

...

- (3) Not later than the fifteenth day following the close of each calendar quarter.

9. There is probable cause to believe Respondents violated § 130.046.1, RSMo, by failing to timely file campaign finance disclosure reports.

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 §§ 130.021 and 130.046.1, RSMo and pursuant to § 105.961.4, RSMo, hereby

ORDERS:

1. Respondents shall comply with all provisions of Chapter 130, RSMo.
2. A fee is imposed against Respondents in the amount of \$3,000; however, if Respondents pay \$300 within 45 days of the date of the consent order, the remainder of the fee will be stayed.
3. Respondents are jointly and severally liable for the payment of this fee.
4. Regardless of the stay in paragraph 2, 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.
5. 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.

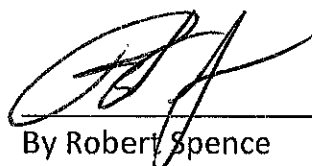
Respondents, together with their heirs, assigns, agents, representatives and attorneys, do hereby waive, release, acquit and forever discharge the MEC, the Commission's respective members, employees, agents and attorneys including former members, employees, agents and attorneys, of, or from any liability, 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

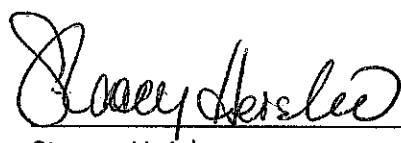
SOUTH COUNTY FORWARD


By Robert Spence
Treasurer

7/13/26
Date

PETITIONER

MISSOURI ETHICS COMMISSION

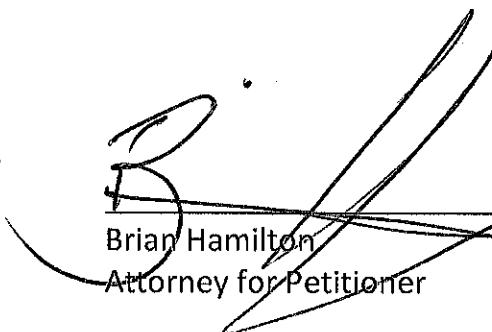

Stacey Heislen
Executive Director

7/21/2026
Date

ROBERT SPENCE


Robert Spence

7/13/26
Date


Brian Hamilton
Attorney for Petitioner

7/21/26
Date

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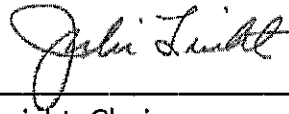
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5. Fees will be paid by check or money order made payable to the Missouri Ethics Commission.

SO ORDERED, this 22nd day of July, 2026.

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

Julie Leicht, Chair
Missouri Ethics Commission