

AUG 04 2026

Missouri Ethics
Commission

MISSOURI ETHICS COMMISSION,

Petitioner,

v.

STEPHAN "BLAKE" ASHBY, Candidate,

and

COMMITTEE TO ELECT BLAKE ASHBY,
Candidate Committee,

Respondents.

Case No. 24-0087-I

The Missouri Ethics Commission ("MEC"), together with Stephan "Blake" Ashby and the Committee to Elect Blake Ashby ("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 § 105.955, RSMo, in part for the purpose of enforcing provisions of Chapter 130, RSMo.

2. Stephan "Blake" Ashby was an unsuccessful candidate for Ward 2 councilmember of the City of Ferguson, in the April 2, 2024 election.

3. Committee to Elect Blake Ashby was a candidate committee that registered with the MEC on January 3, 2024, and terminated on April 30, 2024.

4. Pursuant to § 105.961, RSMo, the MEC's staff investigated a complaint filed with the Commission and reported the investigation findings to the Commission.

5. The Commission determined there were reasonable grounds to believe violations of the law had occurred and authorized a hearing pursuant to § 105.961.3, RSMo.

COUNT I

Failure to Timely File Statement of Committee Organization

6. On November 20, 2023, Respondents received a contribution in the amount of \$5,000.00.

7. On January 3, 2024, Respondents filed a Statement of Committee Organization with the MEC establishing the Committee to Elect Blake Ashby.

COUNT II

Failure to Timely File Reports

8. Respondents accepted one contribution and made three expenditures within the time period covered by the January 2024 Quarterly Report.

9. The January 2024 Quarterly Report was due on or before January 15, 2024.

10. Respondents failed to file a January 2024 Quarterly Report.

COUNT III

Failure to Timely Report a Contribution

11. On November 20, 2023, Respondents received a \$5,000.00 contribution in the form of a loan.

12. This contribution should have been reported on the January 2024 Quarterly Report.

13. Respondents did not file a January 2024 Quarterly Report.

14. This contribution was not reported until Respondents filed the 40 Day Before April 2, 2024 Election Report on February 22, 2024.

COUNT IV

Failure to Timely Report Expenditures

15. Between November 21, 2023, and December 31, 2023, Respondents reported making at least three expenditures totaling \$3,594.40.

16. These expenditures should have been on the January 2024 Quarterly Report.

17. Respondents did not file a January 2024 Quarterly Report.

18. These expenditures were not reported until Respondents filed the 40 Day Before April 2, 2024 Election Report on February 22, 2024.

COUNT V

Acceptance of a Contribution from an Unregistered Limited Liability Company

19. Respondents reported receipt of a contribution from FP1 S Florissant, LLC on January 11, 2024, in the amount of \$500.00 on their 40 Day Before April 2 2024 Election Report.

20. FP1 S Florissant, LLC is a limited liability company that registered with the Missouri Secretary of State on July 18, 2019.

21. FP1 S Florissant, LLC has not elected to be classified as a corporation under the federal tax code.

22. As of the date of the contribution received, FP1 S Florissant, LLC was not registered with MEC as required by § 130.029.4, RSMo.

23. Respondents reported on their 8 Day Before April 4, 2024 Election Report the \$500.00 contribution from FP1 S Florissant, LLC had been returned on February 28, 2024, 48 days after it was received.

COUNT VI

Failure to Include an Accurate "Paid for by" Disclosure

24. Respondents purchased mailers in support of Ashby's candidacy on or about December 19, 2023.

25. The mailers included a disclosure which read, "Paid for by the Committee to Elect Blake Ashby." A true and accurate copy of the mailer is attached hereto and marked as Exhibit A.

26. The mailers should have contained the clear and conspicuous statement: "Paid for by Committee to Elect Blake Ashby" followed by the name of the committee's treasurer.

27. The mailers failed to include the name of the committee's treasurer.

CONCLUSIONS OF LAW

COUNT I

Failure to Timely File Statement of Committee Organization

28. Section 130.011(7), RSMo, defines a "committee" as:

[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.

29. Pursuant to § 130.011(9), RSMo, a "candidate committee" is:

[A] committee which shall be formed by a candidate to receive contributions or make expenditures in behalf of the person's candidacy and which shall continue in existence for use by an elected candidate or which shall terminate the later of either thirty days after the general election for a candidate who was not elected or upon the satisfaction of all committee debt after the election[.]

30. The statutory provision defining exemptions for certain candidates from filing requirements goes on to set threshold limits before activity by a candidate for municipal office requires them to form a committee. Section 130.016.6, RSMo, excludes the following from the definition of committee:

No candidate for ... municipal office in a city of one hundred thousand or less ... shall be required to file an exemption statement pursuant to this section in order to be exempted from forming a committee and filing disclosure reports required of committees pursuant to this chapter if the aggregate of contributions received or expenditures made by the candidate and any other person with the candidate's knowledge and consent in support of the person's candidacy does not exceed one thousand dollars and the aggregate of contributions from any single contributor does not exceed three hundred twenty-five dollars.

31. Lastly, upon meeting the definition of a committee, §130.021.5, RSMo, requires formation to be undertaken, stating, in relevant part:

[A]ny 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.

32. There is probable cause to believe Respondents violated § 130.021.5, RSMo, by failing to timely register a candidate committee within 20 days after accepting the \$5,000.00 contribution.

COUNT II

Failure to Timely File Reports

33. Section 130.041, RSMo, requires the candidate and/or treasurer or deputy treasurer of every committee to file disclosure reports of all receipts and expenditures, as prescribed in § 130.046, RSMo.

34. Section 130.046, RSMo, lists the timing for the filing of reports stating, in part:

1. The disclosure reports required by section 130.041 for all committees shall be filed at the following times and for the following periods:

...

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

...

3. The candidate, if applicable, treasurer or deputy treasurer of a committee shall file disclosure reports pursuant to this section, except for any calendar quarter in which the contributions received by the committee or the expenditures or contributions made by the committee do not exceed five hundred dollars. The reporting dates and periods covered for such 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[.]

35. There is probable cause to believe Respondents violated § 130.046, RSMo, by failing to timely file a January 2024 Quarterly report.

COUNT III

Failure to Timely Report a Contribution

36. The definition of "contribution" in § 130.011(12), RSMo, includes loans.

37. Section 130.041.1(3)(f), RSMo, requires committees to report receipts for each reporting period on all disclosure reports, requiring:

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[.]

38. There is probable cause to believe Respondents violated § 130.041.1(3), RSMo, by failing to timely report the \$5,000.00 contribution.

COUNT IV

Failure to Timely Report Expenditures

39. Section 130.041.1(4), RSMo, lays out what is required of committees in disclosure reports, 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[.]

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

COUNT V

Acceptance of a Contribution from an Unregistered Limited Liability Company

41. Section 130.029.4, RSMo, allows a candidate committee to accept a contribution from a limited liability company (LLC), subject to the following conditions:

- (1) Any limited liability company that is duly registered pursuant to chapter 347 and that has not elected to be classified as a corporation under the federal tax code may make contributions to any committee if the limited liability company has:
 - (a) Been in existence for at least one year prior to such contribution; and
 - (b) Electronically filed with the Missouri ethics commission indicating that the limited liability company is a legitimate business with a legitimate business interest and is not created for the sole purpose of making campaign contributions.

42. Section 130.036.2, RSMo, defines when a contribution is considered to have been accepted:

Unless a contribution is rejected by the candidate or committee and returned to the donor or transmitted to the state treasurer within ten business days after its receipt, it shall be considered received and accepted on the date received, notwithstanding the fact that it was not deposited by the closing date of a reporting period.

43. There is probable cause to believe Respondents violated § 130.029.4, RSMo, by accepting a \$500 contribution from an unregistered limited liability company.

COUNT VI

Failure to Include an Accurate "Paid for by" Disclosure

44. "Any person publishing, circulating, or distributing any printed matter relative to any candidate for public office or any ballot measure shall on the face of the printed matter identify in a clear and conspicuous manner the person who paid for the printed matter with the words 'Paid for by' followed by the proper identification of the sponsor pursuant to this section." § 130.031.8, RSMo.

45. "'[P]rinted matter' shall be defined to include any pamphlet, circular, handbill, sample ballot, advertisement, including advertisements in any newspaper or other periodical, sign, including signs for display on motor vehicles, or other imprinted or lettered material[.]" § 130.031.8, RSMo.

46. Section 130.031.8(2), RSMo, further states the following:

In regard to any printed matter paid for by a committee, it shall be sufficient identification to print the name of the committee as required to be registered by subsection 5 of section 130.021 and the name and title of the committee treasurer who was serving when the printed matter was paid for.

47. There is probable cause to believe that Respondents violated § 130.031.8, RSMo, by purchasing and distributing mailers which failed to include an accurate "Paid for by" disclosure statement.

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 §§ 130.021.5, RSMo (Count I), 130.046, RSMo (Count II), 130.041.1(3) & (4), RSMo (Counts III & IV), 130.029.4, RSMo (Count V) and 130.031.8, RSMo (Count VI), 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 \$10,694, pursuant to § 105.961.4(6), RSMo. However, if Respondents pay \$1,159 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.

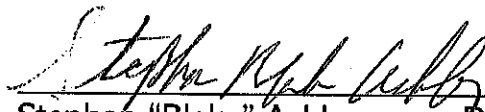
Respondents, together with their heirs, assigns, agents, representatives and attorneys, do hereby waive, release, acquit and forever discharge the MEC, the Commission's respective members, employees, agents and attorneys including former members, employees, agents and attorneys, of, or from any liability,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

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:

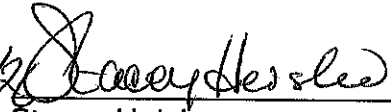
RESPONDENTS

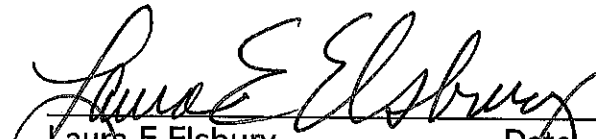
STEPHAN "BLAKE" ASHBY and
COMMITTEE TO ELECT ASHBY


Stephan "Blake" Ashby Date

PETITIONER

MISSOURI ETHICS COMMISSION


Stacey Heislen Date
Executive Director


Laura E Elsbury Date
Commission Counsel

BEFORE THE
MISSOURI ETHICS COMMISSION

Filed

AUG 04 2026

Missouri Ethics
Commission

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 24-0087-I
	)	
STEPHAN "BLAKE" ASHBY, and	)	
COMMITTEE TO ELECT BLAKE ASHBY,	)	
	)	
Respondents.	)	

CONSENT ORDER

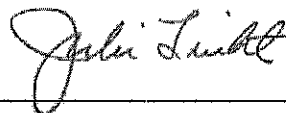
The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.021.5, RSMo (Count I), 130.046, RSMo (Count II), 130.041.1(3) & (4). RSMo (Counts III & IV), 130.029.4, RSMo (Count V) and 130.031.8, RSMo (Count VI), and pursuant to § 105.961.4, RSMo, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130.
2. A fee is imposed against Respondents in the amount of \$10,694, pursuant to § 105.961.4(6), RSMo. However, if Respondents pay \$1,159 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.

SO ORDERED, this 4th day of August 2026.

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

Julie Leicht, Chair
Missouri Ethics Commission