

BEFORE THE
MISSOURI ETHICS COMMISSION

Filed

JUL 21 2026

Missouri Ethics
Commission

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 25-0023-I, 25-0025-I,
	)	and 25-0026-I
	)	
THERESA HESTER, MICHAEL WIESE,	)	
REGINA HARMON-WARD, PEG WARNUSZ,	)	
WELSEY GILLIESPIE, ALICIA SMITH,	)	
and ALEASE DAILES,	)	
	)	
Respondents.	)	

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

The Missouri Ethics Commission ("MEC"), together with Theresa Hester, Michael Wiese, Regina Harmon-Ward, Peg Warnusz, Welsey Gilliespie, Alicia Smith, and Alease Dailes ("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 the provisions of the "constitution or state statute or order, ordinance or resolution of any political subdivision relating to the official conduct of officials or employees of the state and political subdivisions." Section 105.957.1(6), RSMo.
2. At all times relevant to the allegations in this complaint, Respondents were the elected members of the board of alderman for the City of Bellefontaine Neighbors.
3. Pursuant to §§ 105.957 and 105.961, RSMo, the Commission's staff

investigated a complaint that was filed with the Commission and reported the findings to the Commission.

4. 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.

5. On or about February 9, 2025, City Attorney Dorothy White-Coleman resigned her position and encouraged the board of alderman to seek outside legal counsel.

6. On or about February 10, 2025, Respondents contacted attorney Sam J. Alton about providing professional services in the form of legal representation to the City of Bellefontaine Neighbors.

7. Attorney Sam J. Alton began providing professional services (legal representation) to the City of Bellefontaine Neighbors on February 10, 2025.

8. On or about February 11, 2025, Respondents met and voted to hire Sam J. Alton as special legal counsel.

9. On or about February 15, 2025, Respondents adopted Ordinance 2688, hiring Sam J. Alton and the Law Firm of Dowd & Dowd, PC.

10. The cost of the professional services provided by Sam J. Alton and Dowd & Dowd, PC have or will exceed \$10,000.

CONCLUSIONS OF LAW

11. Pursuant to § 79.230, RSMo:

The mayor, with the consent and approval of the majority of the members of the board of aldermen, shall have power to appoint a treasurer, city attorney, city assessor, street commissioner and night watchman, and such other officers as he may be authorized by ordinance to appoint, and if deemed for the best interests of the city, the mayor, and board of alderman may, by ordinance, employ special counsel to represent the city, either in a case of a vacancy in the office of city attorney or to assist the city of attorney, and pay reasonable compensation therefor[.]”

12. The City of Bellefontaine Neighbors has enacted the following related ordinances:

(a) The director of purchasing shall be the mayor who shall be responsible for the procurement and acquisition of all materials, supplies, equipment, contractual services and insurance (acquisition of real estate and certain professional services including, but not limited to, accountants, architects, attorneys, physicians or other services requiring expert or specialized knowledge or skill, planning consultants; insurance advisors and brokers, landscape architects and designers are outside the scope of these regulations). Questions of interpretation of these regulations or questions on procedures in purchasing not specifically stated herein shall be referred to the mayor.

(c) No purchase or contract for services of any kind or description, payment for which is to be made from funds of the city, shall be made by the director of purchasing or any officer, employee or agent of the city, except in the manner hereinafter set forth.

(1) *Items* estimated to cost ten thousand dollars (\$10,000.00) or more can be purchased only after obtaining formal written and sealed bids or by special board action on sole source, specialized and non-standard items.

Section 2-249 (Emphasis added).

When *professional services* in addition to those provided by the city's officers and employees are required by the city in an amount greater than ten thousand dollars (\$10,000.00), investigation shall be made in the manner directed or approved by the board of aldermen concerning persons or companies who perform the required service. On the basis of such investigation, the board shall then designate or approve one (1) or more of such persons or companies for negotiation. The board of aldermen may then, by ordinance, approve a contract for the required professional service.

Section 2-258 (Emphasis added).

13. There is probable cause to believe Respondents violated § 79.230, RSMo, by engaging the professional services of Sam J. Alton and Dowd & Dowd, PC prior to adopting Ordinance 2688.

14. There is probable cause to believe Respondents violated City of Bellefontaine Neighbors Ordinance Section 2-258 by engaging the professional services of Sam J. Alton and Dowd & Dowd PC prior to adopting Ordinance 2688.

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 § 79.230, RSMo, and City of Bellefontaine Neighbors Ordinance Section 2-258,

and pursuant to § 105.961.4, RSMo, hereby **ORDERS:**

1. Respondents shall comply with all statutes and ordinances relating to official conduct.
2. A fee is imposed against Respondents in the amount of \$1,000; however, if Respondents pay \$100 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 statutes and ordinances relating to official conduct, 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

THERESA HESTER

no longer w/ the city
Theresa Hester Date

PETITIONER

MISSOURI ETHICS COMMISSION

Stacey Helslen 7/31/2026
Stacey Helslen Date
Executive Director

MICHEAL WIESE

Micheal Wiese 7/16/26
Micheal Wiese Date

Laura E Elsbury 7/21/2026
Laura E Elsbury Date
Attorney for Petitioner

REGINA HARMON-WARD

no longer w/ the city
Regina Harmon-Ward Date

PEG WARNUSZ

no longer w/ the city
Peg Warnusz Date

WELSEY GILLISPIE

Welsey Gillispie 7/16/26
Welsey Gillispie Date

ALICIA SMITH

Alicia Smith (LS) 7/16/26
Alicia Smith Date

ALEASE DAILES

Alease Dailes 7-16-26
Alease Dalles Date

 07/01/26
Sam J. Alton Date
Dowd & Dowd, PC
Attorney for Respondents

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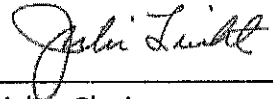
CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated § 79.230, RSMo, and City of Bellefontaine Neighbors Ordinance Section 2-258, and pursuant to § 105.961.4, RSMo, hereby **ORDERS**:

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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", is positioned above a horizontal line.

Julie Leicht, Chair
Missouri Ethics Commission