

Filed

JUL 21 2026

**Missouri Ethics
Commission**

**BEFORE THE
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 26-0003-I
	)	& No. 26-0022-I
MEGAN GREEN and MEGAN GREEN FOR ST. LOUIS,	)	
	)	
Respondents.	)	

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

The Missouri Ethics Commission ("MEC"), together with Megan Green and her candidate committee, Megan Green for St. Louis ("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 Chapter 130, RSMo.
2. Respondent Megan Green is the President of the City of St. Louis Board of Aldermen.
3. Respondent Megan Green for St. Louis is a candidate committee that was established with the MEC on August 4, 2014.
4. Pursuant to §§ 105.957 and 105.961, RSMo, the Commission's staff investigated complaints that were filed with the Commission and reported the 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

Acceptance of a Contribution from an Unregistered Limited Liability Company

6. Respondents reported the receipt of a \$2,600 contribution from H & A Restoration & Development LLC on September 11, 2025.

7. H & A Restoration & Development LLC is a limited liability company that first registered with the Missouri Secretary of State in 2006.

8. In accordance with the provisions of § 130.029.4, RSMo, H & A Restoration & Development, LLC registered with the MEC on January 26, 2026.

9. Respondents' April 2026 Quarterly Report notes that the \$2,600 contribution from H & A Restoration & Development LLC was returned to the contributor.

COUNT II

Failure to Accurately Report Aggregate Contributions

10. On February 29, 2024, Respondents received a \$1,200 contribution from Unite Here TIP Missouri State and Local Fund and reported this contribution on the April 2024 Quarterly Report.

11. On August 28, 2025, Respondents received a \$1,400 contribution from Unite Here TIP Missouri State and Local Fund and reported this contribution on the October 2025 Quarterly Report.

12. The October 2025 Quarterly Report erroneously showed the aggregate contribution amount from Unite Here TIP Missouri State and Local Fund as \$2,400 instead of \$2,600.

COUNT III

Acceptance of a Contribution from a Corporation

13. Respondents reported the receipt of a \$2,600 contribution from Advanced Environmental Services, Inc. on September 11, 2025.

14. Advanced Environmental Services, Inc. is a Missouri corporation in good standing.

15. Respondents' April 2026 Quarterly Report notes that the \$2,600 contribution from Advanced Environmental Services, Inc. was returned to the contributor.

CONCLUSIONS OF LAW

COUNT I

Acceptance of a Contribution from an Unregistered Limited Liability Company

16. Section 130.029.4, RSMo, allows a committee to accept a contribution from a limited liability company, when:

(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.

17. 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.

18. There is probable cause to believe Respondents violated § 130.029.4, RSMo, by accepting a \$2,600 contribution from H & A Restoration & Development LLC on September 11, 2025.

COUNT II

Failure to Accurately Report Aggregate Contributions

19. Section 130.041.1(3)(a), RSMo, requires campaign finance disclosure reports to contain information about monetary contributions received, including the names and addresses of contributors.

20. "For the purpose of this section and any other section in this chapter. . . which requires a listing of each contributor who has contributed a specified amount, the aggregate amount shall be computed by adding all contributions received from any one

person[.]” Section 130.041.2, RSMo.

21. There is probable cause to believe Respondents violated § 130.041.2, RSMo, by incorrectly reporting the aggregate contributions from Unite Here TIP Missouri State and Local Fund.

COUNT III

Acceptance of a Contribution from a Corporation

22. Article VIII, Section 23.3(3)(a) of the Missouri Constitution states:

It shall be unlawful for a corporation or labor organization to make contributions to a campaign committee, candidate committee, exploratory committee, political party committee or a political party; except that a corporation or labor organization may establish a continuing committee which may accept contributions or dues from members, officers, directors, employees or security holders.

23. 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.

24. There is probable cause to believe Respondents violated Article VIII, Section 23.3(3)(a) of the Missouri Constitution by accepting a \$2,600 contribution from Advanced Environmental Services, Inc. on September 11, 2025.

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 §§ 130.029.4 and 130.041.2, RSMo, as well as Article VII, Section 23.3(a) of the Missouri Constitution. Pursuant to § 105.961.4, RSMo, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections 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

PETITIONER

MEGAN GREEN

Megan E. Green 7/20/26
Megan Green Date

Stacey Heislen 7/21/2026
Stacey Heislen Date
Executive Director

MEGAN GREEN FOR ST. LOUIS

Megan E. Green 7/20/26
By Megan Green Date

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

Matthew S. McBride 07.20.2026
Matthew S. McBride Date
Lashly & Baer, PC
Attorney for Respondents

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Filed

JUL 22 2026

Missouri Ethics
Commission

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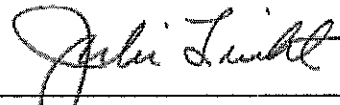
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5. Fees will be paid by check or money order made payable to the Missouri Ethics Commission.

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