

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

AUG 17 2026

**Missouri Ethics
Commission**

MISSOURI ETHICS COMMISSION,

Petitioner,

v.

BOBBY DON DAVIS,

Respondent.

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Case No. 26-0016-I

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

The Missouri Ethics Commission ("MEC"), together with Respondent Bobby Don Davis collectively the "parties," jointly stipulate and consent to action as set forth here (the "agreement").

Respondent acknowledges their right to have this agreement reviewed by counsel. Respondent further acknowledges 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 submits themselves to the jurisdiction of the Missouri Ethics Commission.

Respondent further acknowledges 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 Respondent proven upon the record by competent and substantial evidence; the right to cross-examine any witnesses appearing at the hearing against Respondent; the

right to present evidence on Respondent's behalf at the hearing; and the right to a decision upon the record of the hearing. Being aware of these rights, Respondent knowingly and voluntarily waives each one of these rights and freely enters into this agreement and agrees 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, and is authorized by § 105.957.1(6), RSMo to investigate "the provisions of the constitution or state statute or order, ordinances or resolution of any political subdivision relating to the official conduct of official employees of the state and political subdivisions."

2. Respondent Bobby Don Davis was elected as the Western Commissioner for Ray County Missouri in the November 4, 2024 general election.

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 investigation findings to the Commission.

4. Based on the investigation report, the Commission determined there were

reasonable grounds to believe that violations had occurred, and it therefore authorized a hearing in this matter pursuant to § 105.961.3, RSMo.

5. In September of 2023, Ray County adopted an ordinance establishing a code of ethics and its own method of disclosing potential conflicts of interest for its elected and appointed officials.

6. Pursuant to the Ray County ordinance, Respondent was required to file, on or before May 1, 2025, a Financial Disclosure Statement covering activity for the calendar year of 2024.

Every person required to file a financial interest statement shall file the statement annually, not later than May 1st and the statement shall cover the calendar year ending the immediately preceding December 31st[.]

7. The Ray County ordinance expressly required that the financial interest statement “be filed with the County Clerk and the Missouri Ethics Commission.”

8. Respondent filed his 2024 Financial Disclosure Statement on March 27, 2026.

CONCLUSIONS OF LAW

9. Financial interest disclosure statements must be filed by many public officials, including:

Each elected official, candidate for elective office, the chief administrative officer, the chief purchasing officer and the general counsel, if employed full time, of each political subdivision with an annual operating budget in excess of one million dollars, and each official or employee of a political subdivision who is authorized by

the governing body of the political subdivision to promulgate rules and regulations with the force of law or to vote on the adoption of rules and regulations with the force of law; unless the political subdivision adopts an ordinance, order or resolution pursuant to subsection 4 of section 105.485.

Section 105.483(11), RSMo.

10. The exception in Subsection 4 of § 105.485, RSMo, provides that:

Each official, officer or employee or candidate of any political subdivision described in subdivision (11) of section 105.483 shall be required to file a financial interest statement as required by subsection 2 of this section, unless the political subdivision biennially adopts an ordinance, order or resolution at an open meeting by September fifteenth of the preceding year, which establishes and makes public its own method of disclosing potential conflicts of interest and substantial interests[.]

11. There is probable cause to believe that Respondent violated the provisions of the Ray County ordinance by failing to timely file his 2024 financial interest 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 Consent Order issued by the Missouri Ethics Commission in this matter:

CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe Respondent violated a Ray County ordinance and pursuant to § 105.961.4, RSMo, hereby **ORDERS**:

1. Respondent shall comply with all relevant ordinances.
2. A fee is imposed against Respondent in the amount of \$1,000; however, if he pays \$100 within 45 days of the date of the consent order, the remainder of the fee will be stayed.
3. Regardless of the stay in paragraphs 2, if there is probable cause to believe that Respondent has committed any further violation of a relevant Ray County ordinance within the two-year period from the date of this order, then he will be required to pay the remainder of the fee. That remainder will be due immediately upon final adjudication of finding probable cause.
4. Fees will be paid by check or money order made payable to the Missouri Ethics Commission.

II.

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.

Respondent, together with their heirs, assigns, agents, representatives and attorneys, does 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 any court or administrative tribunal deems this agreement or any portion thereof void or unenforceable.

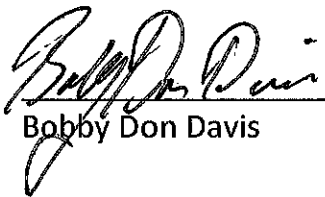
This agreement shall become effective immediately upon (1) the signature of all

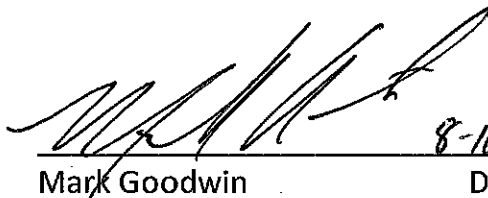
parties; (2) the adoption of the Joint Proposed Findings of Fact, Conclusions of Law by the Missouri Ethics Commission; and (3) the issuance of a Final Order by the Commission, without any further action by the parties.

SO AGREED:

RESPONDENT

BOBBY DON DAVIS

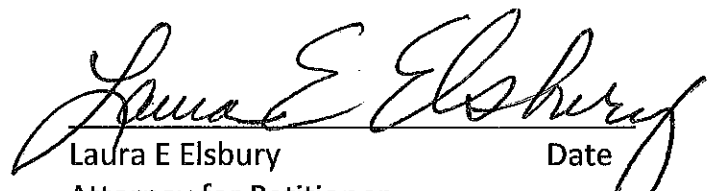
 8-10-26
Bobby Don Davis Date

 8-10-2026
Mark Goodwin Date
Attorney for Respondent

PETITIONER

MISSOURI ETHICS COMMISSION

 8/17/2026
Stacey Heislen Date
Executive Director


Laura E Elsbury Date
Attorney for Petitioner

Filed

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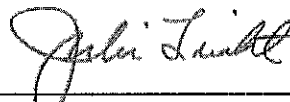
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4. Fees will be paid by check or money order made payable to the Missouri Ethics Commission.

SO ORDERED, this 25th day of August, 2026.



Julie Leicht, Chair
Missouri Ethics Commission