

AUG 25 2026

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. Respondent Citizens for a Better Columbia is a continuing committee that first registered with the MEC on December 4, 2014.

3. Respondent Angie Regan is the Committee's current Treasurer.

4. Pursuant to §§ 105.957 and 105.961, RSMo, the MEC's staff investigated a complaint that was 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 Continually Maintain the Office of Committee Treasurer

6. When Citizens for a Better Columbia first registered as a continuing committee in 2014, John Williams was identified as the committee's treasurer and no deputy treasurer was identified.

7. In 2016, Yancey Williams was identified as the committee treasurer.

8. In 2017, John Williams was reinstated to the office of committee treasurer.

9. John Williams passed away on November 15, 2022.

10. In May of 2025, MEC staff was told that Brian Burks was the Committee's treasurer and a blank Statement of Committee Organization form was provided to Burks, but the form was never returned to or filed with the MEC.

11. No new treasurer was identified until an amended Statement of Committee Organization was received by the MEC on April 4, 2026 (dated April 3, 2026).

COUNT II

Improper Access to the Official Depository Account

12. The signature card for the Committee's official depository account, dated November 3, 2014, shows only the following individuals as authorized signers:

- 1) Billy G. Sapp
- 2) W. Randall Coil
- 3) Paul Land

13. As of April 23, 2025, the signature card had not been updated or amended.

14. On December 10, 2024, Billy G. Sapp signed a \$25,000 check on the committee's official depository account payable to "Murph for Mayor."¹

COUNT III

Failure to File Amended Statements of Committee Organization

15. Respondents did not timely file an amended Statement of Committee Organization after the passing of the committee treasurer, John Williams.

16. If there were any treasurers or deputy treasurers acting on behalf of the committee between November 15, 2022 and April 3, 2026, information about those individuals was not provided to the MEC on an amended Statement of Committee Organization.

COUNT IV

Failure to Report Contributions

17. On the October 2023 Quarter Report, Respondents reported having \$52,302.70 on hand at the close of the reporting period, which was September 30, 2023.

18. The balance in the Committee's official depository account on September 30, 2024 was \$55,258.18.

¹ This contribution went to the candidate committee, "Murphy for Mayor" (MEC ID 243200) which properly reported receipt of the contribution.

19. Respondents received one or more contributions between October of 2023 and September of 2024.

20. Respondents have not reported the receipt of any contributions since September 30, 2023, nor have they disclosed any other information that would explain the increase in funds on hand.

COUNT V

Failure to Report a Contribution Made

21. Respondents failed to report a \$25,000 contribution made to the Murphy for Mayor committee in October of 2024.

COUNT VI

Failure to File Full Disclosure Reports

22. Respondents have filed only Statements of Limited Activity since October of 2023 even though the aggregate contributions and expenditures for the committee have exceeded \$500 during at least one reporting period in light of the unreported contribution(s) discussed in Count IV and the unreported \$25,000 contribution made discussed in Count V.

COUNT VII

Failure to Timely and Accurately File Campaign Finance Disclosure Reports

23. Respondents failed to timely file the following reports:

Report Name	Due Date	Filing Date
July 2025 Quarterly Report	07/15/2025	04/14/2026
October 2025 Quarterly Report	10/15/2025	04/14/2026
January 2026 Quarterly Report	01/15/2026	04/14/2026

24. All campaign financial disclosure reports and statements of limited activity contain the following attestation by the Treasurer:

I certify that neither the aggregate amount of contributions received nor the aggregate amount of expenditures made by the committee exceeded five hundred dollars.

25. Between November 15, 2022, and April 3, 2026, the reports were filed by someone other than the committee's treasurer, so it is unclear who has made this attestation on behalf of the committee.

CONCLUSIONS OF LAW

COUNT I

Failure to Continually Maintain the Office of Committee Treasurer

26. Pursuant to § 130.011(10), RSMo, a "continuing committee" is:

[A] committee of continuing existence which is not formed, controlled or directed by a candidate, and is a committee other than a candidate committee or campaign committee, whose primary or incidental purpose is to receive contributions or make expenditures to influence or attempt to influence the action of voters whether or not a particular candidate or candidates or a particular ballot

measure or measures to be supported or opposed has been determined at the time the committee is required to file any statement or report pursuant to the provisions of this chapter.

27. "Every committee shall have a treasurer who . . . shall be a resident of this state and reside in the district or county in which the committee sits. A committee may also have a deputy treasurer who . . . shall be a resident of this state and reside in the district or county in which the committee sits, to serve in the capacity of committee treasurer in the event the committee treasurer is unable for any reason to perform the treasurer's duties." Section 130.021.1, RSMo.

28. There is probable cause to believe Respondents violated § 130.021.1, RSMo, by allowing the office of committee treasurer to be vacant from at least November 15, 2022, to April 3, 2026.

COUNT II

Improper Access to the Official Depository Account

29. "Every committee shall have a single official fund depository" account. Section 130.021.4(1), RSMo.

30. "Contributions shall not be accepted and expenditures shall not be made by a committee except by or through an official depository account and the committee treasurer [or] deputy treasurer[.]" Section 130.021.4(1), RSMo.

31. "No expenditure shall be made by a committee when the office of committee treasurer is vacant[.]" Section 130.021.4(1), RSMo.

32. There is probable cause to believe Respondents violated § 130.021.4(1), RSMo, by making expenditures through someone other than the committee treasurer and for making expenditures while the office of treasurer was vacant.

COUNT III

Failure to File Amended Statements of Committee Organization

33. Committees are required to file a Statement of Committee Organization with the MEC within 20 days of the committee coming into existence. Section 130.021.5, RSMo.

34. When changes to the required information occur, amended statements must be filed within 20 days. Section 130.021.7, RSMo.

35. There is probable cause to believe Respondents violated § 130.021.7, RSMo, by failing to file amended Statements of Committee Organization.

COUNT IV

Failure to Report Contributions

36. Committees are required to accurately report all monetary contributions received during the relevant reporting period. Contributions that are less than \$100 each need only be reported in the aggregate. Section 130.041.1(3), RSMo.

37. There is probable cause to believe that Respondents violated § 130.041.1(3), RSMo, by failing to report all contributions.

COUNT V

Failure to Report a Contribution Made

38. Committees are required to accurately report all expenditures made during the relevant reporting period. Expenditures that are less than \$100 each need only be reported by category and in the aggregate. Section 130.041.1(4), RSMo.

39. The definition of expenditure includes a "contribution of money . . . for the purpose of supporting or opposing the nomination or election of any candidate for public office[.]" Section 130.011(17), RSMo.

40. There is probable cause to believe that Respondents violated § 130.041.1(4), RSMo, by failing to report all expenditures, including contributions made.

COUNT VI

Failure to File Full Disclosure Reports

41. Section 130.041, RSMo, requires all committees to file campaign finance disclosure reports at the times and for the periods prescribed in § 130.046, RSMo.

42. Reports are required at the end of every calendar quarter. Section 130.046.1(3), RSMo.

43. If the committee's aggregate contributions and expenditures do not exceed \$500 during the quarter, the committee may instead file a statement of limited activity. Section 130.046.3, RSMo; Section 130.046.5(2), RSMo.

44. There is probable cause to believe Respondents violated §§ 130.041 and 130.046, RSMo, by filing statements of limited activity when full campaign finance disclosure reports were required.

COUNT VII

Failure to Timely and Accurately File Campaign Finance Disclosure Reports

45. Section 130.046.1(3), RSMo, prescribes the deadlines for filing campaign finance disclosure reports: Quarterly reports must be filed 15 days after the close of the quarter by all committees.

46. Campaign finance disclosure reports “shall be signed and attested by the committee treasurer or deputy treasurer[.]” Section 130.041.3, RSMo.

47. There is probable cause to believe that Respondents violated § 130.041 by failing to timely and accurately 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 Consent Order issued by the Missouri Ethics Commission in this matter:

CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated several provisions of Chapter 130, RSMo, and pursuant to § 105.961.4, RSMo, hereby **ORDERS**:

1. Respondents shall hereafter comply with all relevant sections of Chapter 130, RSMo.
2. Within 60 days of the date of the consent order, Respondents shall file amended campaign finance reports as necessary to address errors or omissions.
3. A fee is imposed against Respondents in the amount of \$31,000; however, if Respondents pay \$3,100 within 60 days of the date of the consent order and file amended reports as necessary, the remainder of the fee will be stayed.
4. Respondents are jointly and severally liable for the payment of this fee.
5. Regardless of the stay in paragraph 3, 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 the consent 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.
6. 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 by the parties.

SO AGREED:

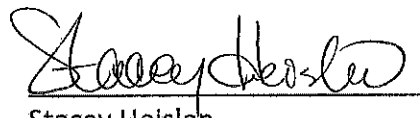
RESPONDENTS

CITIZENS FOR A BETTER COLUMBIA

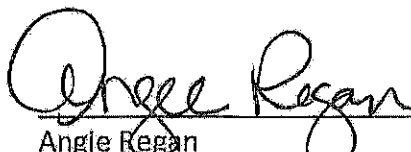

By Angie Regan Date 8/21/26
Treasurer

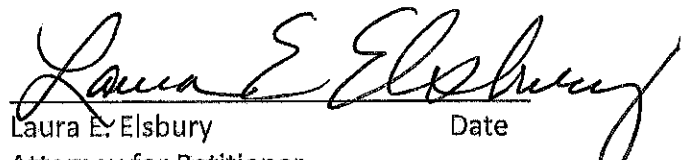
PETITIONER

MISSOURI ETHICS COMMISSION


Stacey Helslen Date 8/25/2026
Executive Director

ANGIE REGAN, TREASURER


Angie Regan Date 8/21/26
Treasurer


Laura E. Elsbury Date
Attorney for Petitioner


Adam K. Patchett Date 8-21-26
Bush & Patchett, L.L.C.
Attorney for Respondents

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

AUG 27 2026

Missouri Ethics
Commission

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 26-0020-I
	)	
CITIZENS FOR A BETTER COLUMBIA, Continuing	)	
Committee, and ANGIE REGAN, Treasurer,	)	
	)	
Respondents.	)	

CONSENT ORDER

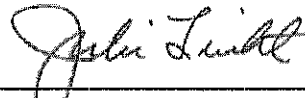
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campaign finance laws in Chapter 130, RSMo, within the two-year period from the date of the Consent Order, then the Respondent who committed the new violation will be required to pay the remainder of the fee. That remainder will be due Immediately upon final adjudication of finding probable cause.

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

SO ORDERED, this 27th 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