Filed

OCT 12 2026

Missouri Ethics Commission

BEFORE THE
MISSOURI ETHICS COMMISSION

MISSOURI ETHICS COMMISSION, Petitioner, v. HENRY IWENOFU and CITIZENS TO ELECT HENRY IWENOFU, Respondents.	)	Case No. 26-0012-I

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

The Missouri Ethics Commission ("MEC"), together with Henry Iwenofu and his candidate committee, Citizens to Elect Henry Iwenofu ("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. Henry Iwenofu is a candidate for State Representative of District 73, running in the August 4, 2026 Primary.

3. Citizens to Elect Henry Iwenofu is a candidate committee that was established with the MEC on October 2, 2025.

4. 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.

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

COUNT I

Acceptance of a Contribution from an Unregistered Limited Liability Company

6. Respondents reported the receipt of a $500 contribution from "Obax Infrastructures/O'Basuyi Construction LLC" on December 15, 2025.

7. No such entity is registered with the Missouri Secretary of State, but there is an Obax Infrastructures LLC dba O'Basuyi Construction that is registered as a fictitious entity.[1]

8. Obax Infrastructures LLC dba O'Basuyi Construction is owned by Obax Infrastructures LLC.

9. Obax Infrastructures LLC is a limited liability company that first registered with the Missouri Secretary of State in 2016.

10. Obax Infrastructures LLC is not classified as a corporation under the federal tax code.

11. As of December 15, 2025, Obax Infrastructures LLC was not registered with the MEC as required by § 130.029.4, RSMo.

[1] There is also an entity named "O'Basuyi Construction LLC" registered in Missouri as a limited liability company, and it shares a registered agent with Obax Infrastructures LLC. O'Basuyi Construction LLC is not registered with the MEC.

12. On February 17, 2026, Respondents filed an amended campaign finance report that omits this contribution and states that it was returned to the contributor.

COUNT II

Acceptance of a Contribution from a Corporation

13. Respondents reported the receipt of a $250 contribution from "Sunshine Home Healthcare" at 3159 Fee Fee Road in Bridgeton on November 7, 2025.

14. The principal office address for Sunshine In Home Services, Inc. is also 3159 Fee Fee Road in Bridgeton.

15. Sunshine In Home Services, Inc. is a Missouri corporation that was in good standing on November 7, 2025.

16. The Registered Agent for Sunshine In Home Services, Inc. confirmed that the $250 contribution was from Sunshine In Home Services, Inc.

17. On February 17, 2026, Respondents filed an amended campaign finance report that omits this contribution and states that it was returned to the contributor.

CONCLUSIONS OF LAW

COUNT I

Acceptance of a Contribution from an Unregistered Limited Liability Company

18. Section 130.029.4, RSMo, allows for a committee to accept a contribution from a limited liability company (LLC), 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.

19. 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.

20. There is probable cause to believe Respondents violated § 130.029.4, RSMo, by accepting a $500 contribution from Obax Infrastructures LLC on December 15, 2025.

COUNT II

Acceptance of a Contribution from a Corporation

21. 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.

22. 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.

23. There is probable cause to believe Respondents violated Article VIII, Section 23.3(3)(a) of the Missouri Constitution by accepting a $250 contribution from Sunshine In Home Services, Inc. on November 7, 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 as well as Article VII, Section 23.3(3)(a) of the Missouri Constitution, and 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 $2,000; however, if Respondents pay $200 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

HENRY IWENOFU

10/10/26

Henry Owenofu — Date

PETITIONER

10/12/26

Stacey Heislen — Date
Executive Director

CITIZENS TO ELECT HENRY OWENOFU

10/10/26

By Henry Owenofu — Date

Laura E Elsbury — Date
Attorney for Petitioner

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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.

SO ORDERED, this 3rd day of November, 2026.

Julie Leicht, Chair
Missouri Ethics Commission