Filed
OCT 20 2026
Missouri Ethics Commission

BEFORE THE
MISSOURI ETHICS COMMISSION

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 26-0026-I
	)	
DOROTHY BROWN,	)	
	)	
Respondent.	)	

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

The Missouri Ethics Commission ("MEC"), together with Dorothy Brown ("Respondent"), 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, in part for the purpose of enforcing the financial interest disclosure laws in Chapter 105, RSMo.

2. The MEC is also expressly authorized to receive and investigate complaints alleging violations of an "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.

3. Respondent Dorothy Brown was appointed on May 12, 2025, to serve as Ward 2 councilperson in the City of Louisiana after the official elected to that position passed away.

4. She did not seek reelection when the term expired and is no longer serving.

5. 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.

6. 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.

7. On June 6 2023, the City of Louisiana adopted Ordinance No. 2-2023 establishing its own method of disclosing potential conflicts of interest for elected officials. Ordinance No. 2-2023 remained in effect for two years from the date of its passage.[1]

8. Ordinance No. 2-2023 included the following requirement: "Each person appointed to office shall file the statements within thirty days of such appointment or employment covering the calendar year ending the previous December 31[.]"

9. Respondent did not file a financial interest statement covering the calendar year of January 1, 2024 through December 31, 2024.

CONCLUSIONS OF LAW

10. 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

[1] A new ordinance was passed on June 23, 2025.

> 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.

11. 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[.]

12. There is probable cause to believe that Respondent violated provisions of Louisiana City Ordinance No. 2-2023 by failing to file a financial interest disclosure for the 2024 calendar year within thirty days of appointment.

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 Louisiana City Ordinance No. 2-2023 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 she 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 paragraph 2, if there is probable cause to believe that Respondent has committed any further violation of a relevant Louisiana City ordinance within the two-year period from the date of this order, then she 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 of the parties.

SO AGREED:

RESPONDENT

DOROTHY BROWN

Dorothy L. Brown 10/14/26

Dorothy Brown Date

PETITIONER

MISSOURI ETHICS COMMISSION

Stacey Heislen 10/20/26

Stacey Heislen Date
Executive Director

Laura E Elsbury

Laura E Elsbury Date
Attorney for Petitioner

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SO ORDERED, this 9th day of November, 2026.

Julie Leicht, Chair
Missouri Ethics Commission