

**BEFORE THE
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,)
)
 Petitioner,)
)
v.)
)
ROBIN WRIGHT-JONES,)
Candidate)
)
and)
)
WRIGHT-JONES FOR MISSOURI,)
Candidate Committee)
)
 Respondents.)

Case No. 11A116, 12E003

**FINDINGS OF FACT, CONCLUSIONS OF LAW AND
ORDER**

This is the final decision and order of the Missouri Ethics Commission following a hearing on a complaint filed by Petitioner by and through counsel, pursuant to Section 105.961, RSMo, and Chapter 536, RSMo. The hearing was conducted before the following members of the Missouri Ethics Commission: Dennis Rose, Louis J. Leonatti, Vernon Dawdy, John Munich, Bill Stoltz, and Charles Weedman.

A closed hearing took place on Friday, May 10, 2013, at the offices of the Missouri Ethics Commission at 3411A Knipp Drive, Jefferson City, Missouri 65109. The Commission was represented by attorney Curt Stokes. Respondents appeared in person with counsel, Bernard F. Edwards, Jr.

The Commission admitted into evidence Petitioner’s Exhibits 1 through 15, 17 through 44, and 53 as well as the testimony of witnesses. Respondent Wright-Jones, called as a witness and sworn under oath, asserted her Fifth Amendment right not to testify regarding purchases by

her committee and regarding mileage allowances and reimbursements that she received while she served in the Missouri Senate. Having considered all the competent and substantial evidence upon the whole record, the Commission finds by a vote of 6-0 as follows unless otherwise indicated:

FINDINGS OF FACT

1. The Missouri Ethics Commission (“the Commission”) is an agency of the State of Missouri established pursuant to Section 105.955, RSMo, in part for the purpose of enforcing the provisions of Chapter 130, RSMo.

2. Respondent Wright-Jones was a successful candidate for State Senator District 5 in the November 4, 2008, general election.

3. Respondent Wright-Jones for Senate is and was at all relevant times the candidate committee formed by Respondent Wright-Jones to support her Senate candidacy in the 2008 general election and subsequent elections.

4. Rochelle Tilghman was the named treasurer of Wright-Jones for Senate committee from 2007 to July 14, 2011.

5. Angelia Elgin was the named treasurer of Wright-Jones for Senate committee from July 14, 2011, to March 16, 2012.

6. Pursuant to Section 105.961, RSMo, the Commission’s staff has audited the reports and statements filed with the Commission and reported the investigation’s findings to the Commission.

7. Based on the report of the Commission’s staff, the Commission determined that there are reasonable grounds to believe that violations of law occurred, and it therefore authorized a hearing in this matter pursuant to Section 105.961.3, RSMo.

COUNT I

Failure to timely amend statement of committee organization

8. Respondents originally reported an account ending in *4009 (hereinafter “first official depository account”) with the St. Louis Community Credit Union.

9. Respondents opened an account ending in *6956 (hereinafter “second official depository account”) with the St. Louis Community Credit Union on or about February 10, 2011

10. Respondents did not by March 2, 2011, file an amended statement of committee organization disclosing the fact that the second official depository account had been opened.

11. On or about April 8, 2011, Respondents transferred all funds remaining in their first official depository account into their second official depository account and closed the first official depository account. On the closed account form, Respondents circled “Transfer to new account” as the reason Respondents closed that account.

12. Respondent did not, by April 28, 2011, file an amended statement of committee organization disclosing the fact that its first official depository account had been closed.

COUNT II

Failure to timely file campaign finance disclosure reports and failure to accurately report money on hand

13. Respondents failed to file the October 2010 quarterly disclosure report.

14. Respondents filed the following reports untimely, and did not file the report that was due 8 days before the November 2008 general election until after the election:

Reports filed untimely			
Report	Due	Filed	Days Late
April 2008 quarterly	4/15/08	4/16/08	1
30 Day after Primary August 2008	9/4/08	10/15/08	41
October 2008 quarterly	10/15/08	10/16/08	1

Reports filed untimely			
Report	Due	Filed	Days Late
8 Days before general November 2008	10/27/08	11/23/08	27
April 2009 quarterly	4/15/09	4/24/09	9
October 2009 quarterly	10/15/09	10/16/09	1
January 2010 quarterly	01/15/10	1/16/10	1
April 2010 quarterly	4/15/10	8/29/10	136
July 2010 quarterly	7/15/10	8/29/10	45
April 2011 quarterly	4/15/11	5/31/11	45
October 2011 quarterly	10/15/11	10/17/11	2

15. Respondents improperly excluded the dates July 25, 2008 through August 29, 2008, from the reporting period for the “30 Day After” report for the August 2008 primary election. That report should have included the reporting period July 25, 2008, through August 30, 2008.

16. Respondents improperly excluded October 23, 2008, from the reporting period for the “8 Day Before” report for the November 2008 general election. That report should have included the reporting period October 1, 2008, through October 23, 2008.

17. Respondents reported cash on hand at the end of the April 2010 quarterly reporting period as approximately \$95,000.

18. Respondents reported cash on hand at the beginning of the April 2011 quarterly reporting period as \$211.

19. In between the April 2010 quarterly report and the April 2011 quarterly report, there is no explanation for the difference in Respondents’ cash on hand.

COUNT III

Failure to timely and accurately report contributions received

20. Respondents failed to timely disclose the following \$71,492.00 in contributions and/or miscellaneous receipts:

Contributions Not Reported		
Contributor	Date	Amount
Consulting Engineers Council of MO/PAC	6/3/2008	\$200.00
WPC EMPAC	6/18/2008	\$500.00
Ilene and Henry Ordower	7/15/2008	\$100.00
Phyllis Friedman	7/15/2008	\$100.00
D & S Prenger	7/15/2008	\$200.00
Basilico Engineering Inc.	7/15/2008	\$300.00
United Steelworkers of America local 169	7/15/2008	\$300.00
BDR - Beck Disaster Recovery	7/15/2008	\$500.00
Jerome and Cindy Shaw	7/15/2008	\$500.00
Robert and Pamela Affholder	7/15/2008	\$500.00
Halbert Sullivan	7/17/2008	\$100.00
Cash	7/18/2008	\$100.00
Joan G Botwinick	7/18/2008	\$200.00
Pittsburgh Pipe	7/18/2008	\$675.00
Susan Gwen Turk James J Hebda	7/21/2008	\$100.00
Sterling S Miller	7/21/2008	\$350.00
Joann Williams	7/22/2008	\$200.00
Susan Talve and James Stone Goodman	7/22/2008	\$200.00
Margaret Pedersen	7/22/2008	\$300.00
Maida J Coleman	7/23/2008	\$150.00
Angelia M Elgin	7/23/2008	\$500.00
Hudson and Assoc., LLC, Sheila A Hudson	7/23/2008	\$500.00
Maida Jean Coleman	7/23/2008	\$675.00
Credit Union PAC	7/24/2008	\$375.00
Unite here Missouri PAC	7/24/2008	\$650.00
Missouri State UAW PAC	7/24/2008	\$675.00
AT&T Missouri	7/25/2008	\$100.00
AT&T Missouri	7/25/2008	\$100.00
AT&T Missouri	7/25/2008	\$200.00
AT&T Missouri	7/25/2008	\$250.00
AT&T Missouri	7/25/2008	\$250.00
AT&T Missouri	7/25/2008	\$250.00
Operating Engineers Local 101 PAC	7/25/2008	\$675.00
Sharon Howard	7/28/2008	\$100.00

Contributions Not Reported		
Contributor	Date	Amount
18th Senatorial District Democratic Committee	7/28/2008	\$500.00
Emily's List NF Fund	7/31/2008	\$675.00
Janette M Lohman	8/5/2008	\$100.00
Rev Sammie E Jones Sandra E Jones	8/5/2008	\$100.00
Urban Planning & Development Corp	8/5/2008	\$250.00
Joseph M Dorsey Jr. DDS MS	8/5/2008	\$325.00
North County Labor Legislative Club	8/5/2008	\$600.00
Earl E Nance Jr. Viola H Nance	8/8/2008	\$100.00
Philip M Hess	9/5/2008	\$300.00
Cement Masons Union Local No 527	9/15/2008	\$100.00
Home Building Industry PAC	9/22/2008	\$500.00
Missouri Professionals Mutual	9/22/2008	\$675.00
Metal Container Corp	9/22/2008	\$1,000.00
Phillip Patrick Scaglia	9/25/2008	\$100.00
Friends of Steve Brown	10/6/2008	\$200.00
Public Eye Inc. Paristyle Building	10/6/2008	\$250.00
Friends of Missouri State University PAC	10/6/2008	\$300.00
Health Care Leadership Committee State Acct	10/6/2008	\$500.00
AFSCME Missouri People Public Employees	10/6/2008	\$675.00
Credit Union PAC	10/6/2008	\$675.00
MBA Gateway Region PAC	10/6/2008	\$675.00
Missouri State Teachers Association Leg	10/6/2008	\$675.00
Pfizer	10/6/2008	\$675.00
AT&T Missouri Employee PAC	10/6/2008	\$750.00
AGC of St Louis PAC	10/6/2008	\$1,000.00
Victor Callahan DBA Callahan for State Senate	10/6/2008	\$2,000.00
Group Health Plan	10/7/2008	\$500.00
Plumbing Industry Council	10/9/2008	\$200.00
Missouri Pharmacy PAC	10/9/2008	\$500.00
United Transportation Union PAC	10/9/2008	\$600.00
BNSF Railway Company	10/9/2008	\$2,000.00
Supporters of Health Research & Treatments	10/9/2008	\$2,500.00
Ameren UE PAC	10/10/2008	\$750.00
Bennie L Lewis & Associates LLC	10/17/2008	\$300.00
Novartis Pharmaceuticals Corp	10/17/2008	\$500.00
Bank of Missouri PAC	10/17/2008	\$675.00
Leonard S Dino Jr & Carrie N Dino	10/17/2008	\$1,000.00
14th Ward Democratic Organization	10/23/2008	\$250.00
Ameristar Casino Kansas City Inc	10/23/2008	\$500.00
Ameristar Casino St Charles	10/23/2008	\$500.00
ARDA ROC-PAC/MO	10/23/2008	\$500.00
Missouri Energy Development Assoc. PAC	10/23/2008	\$675.00

Contributions Not Reported		
Contributor	Date	Amount
St Louis Assoc. of Realtors PAC	10/23/2008	\$675.00
Ameren UE PAC	10/23/2008	\$750.00
John Bardgett & Associates Inc	10/23/2008	\$1,000.00
Missouri Dental Hygienist PAC	10/29/2008	\$500.00
MO Association of Nurse Anesthetists PAC	10/29/2008	\$500.00
IBEW Educational Committee	10/29/2008	\$650.00
13th Ward Regular Democratic Club	11/5/2008	\$100.00
20th Ward Democratic Campaign Committee	11/5/2008	\$100.00
John Q Public Communications LLC	11/5/2008	\$100.00
Consulting Engineers Council of MO/PAC	11/5/2008	\$500.00
Site Improvement Assoc. SITEPAC	11/5/2008	\$500.00
Altria Client Services Inc	11/5/2008	\$1,000.00
James P Schoemehl, Jr.	11/20/2008	\$100.00
Kimberly Investments	11/20/2008	\$100.00
PM Café Inc	11/20/2008	\$100.00
Johnny Investment Inc	11/20/2008	\$1,067.00
William F Siedhoff	11/26/2008	\$100.00
Missouri Independent Bankers Association PAC	5/21/2009	\$625.00
Anheuser-Busch Cos Inc	6/5/2009	\$1,350.00
Legacy Building Group LLC	6/11/2009	\$1,500.00
Mitchell and Lynda Baris	7/8/2009	\$100.00
Ms. Zelema Harris	8/5/2009	\$100.00
International Union of Elevator Contractors 3	8/5/2009	\$500.00
Maurice A Watson	9/4/2009	\$200.00
John Bugh Jill Bugh	9/9/2009	\$100.00
Advantage Capital Management Corp	9/9/2009	\$250.00
Missouri State Council of Machinist PAC	9/17/2009	\$100.00
The Kelley Group Inc	10/8/2009	\$100.00
Don M Holt	10/8/2009	\$150.00
Site Improvement Association SITEPAC	10/13/2009	\$250.00
Ameren UE PAC	10/30/2009	\$500.00
Missouri State UAW PAC	10/30/2009	\$500.00
AstraZeneca Zeneca Services	10/30/2009	\$650.00
C.L. Smith Company	11/3/2009	\$250.00
St Louis Labor Council AFL-CIO Project 2000	11/3/2009	\$250.00
Waste Management	11/3/2009	\$350.00
United Transportation Union PAC	11/3/2009	\$600.00
Life Sciences Fund of The Greater KC Chamber PAC	11/3/2009	\$1,500.00
Johnson and Johnson Services Inc	11/6/2009	\$500.00
Pinnacle Entertainment	11/6/2009	\$1,000.00
Missouri Energy Development Association PAC	11/13/2009	\$200.00

Contributions Not Reported		
Contributor	Date	Amount
David Mason & Associates	11/13/2009	\$500.00
Tri-Tec Inc	11/13/2009	\$800.00
Gateway Contractors	11/13/2009	\$1,000.00
Union Seventy Partnership	11/13/2009	\$1,250.00
Kozeny-Wagner Inc.	11/13/2009	\$1,500.00
Grant Communications LLC	11/24/2009	\$100.00
AT&T Missouri Employee PAC	11/24/2009	\$750.00
Ameren UE PAC	12/16/2009	\$500.00
Bank of Missouri PAC	12/16/2009	\$1,000.00
Bernardin, Lochmueller & Associates, Inc	12/28/2009	\$500.00
Missouri Dental Hygienist PAC	12/28/2009	\$500.00
Ameristar Casino Kansas City Inc	1/4/2010	\$250.00
Ameristar Casino St Charles	1/4/2010	\$250.00
Simmons Attorneys at Law	1/4/2010	\$1,000.00
Supporters of Health Research & Treatments	1/4/2010	\$1,500.00
Monsanto Company	4/6/2010	\$500.00
PFHC PAC	4/9/2010	\$2,000.00
Dealers Interested in Government	4/23/2010	\$1,000.00
Penn National Gaming Inc	6/21/2010	\$500.00
Missouri Federation of Teachers State & Local Cope	9/27/2010	\$100.00
	Total	\$71,492.00

21. After amending reports during the course of the Commission's audit, Respondents still failed to disclose the following \$4,242.00 in contributions and/or miscellaneous receipts:

Contributions Not Reported on Amended Reports		
Contributor	Date	Amount
Home Building Industry PAC	9/22/2008	\$500.00
Missouri Professionals Mutual	9/22/2008	\$675.00
Group Health Plan	10/7/2008	\$500.00
Consulting Engineers Council of MO/PAC	11/5/2008	\$500.00
Altria Client Services Inc	11/5/2008	\$1,000.00
Johnny Investment Inc	11/20/2008	\$1,067.00
	Total	\$4,242.00

22. Respondents reported the following \$3,475 in contributions that were not deposited into Respondents' official depository accounts:

Contributions reported but not deposited into official depository account			
Contributor	Date	Amount	Reported
Michael Wesley Jones	7/31/2008	\$300.00	Amended 30 Day After Primary, filed August 5, 2008
Missouri Credit Union Association	9/22/2008	\$675.00	Amended October 2008 quarterly
Missouri Physical Therapy of MO PAC	10/22/2008	\$500.00	Amended 8 Day Before General, filed November 4, 2008
International Association of Fire Fighters	12/4/2009	\$500.00	Amended January 2010 quarterly
Health Care Leadership Comm.	12/4/2009	\$500.00	Amended January 2010 quarterly
Altria Client Services, Inc.	12/4/2009	\$1,000.00	Amended January 2010 quarterly
	Total	\$3,475.00	

23. Respondents inaccurately reported the aggregate of contributions of \$100 or less. Specifically, between the July 2008 quarterly report and the Amended April 2010 quarterly report, Respondents actually received such contributions aggregating \$7,685, but reported \$3,140 in such contributions as follows:

Contributions \$100 or less reported inaccurately			
Report	Reported aggregate contributions \$100 or less	Actual contributions \$100 or less in official depository account	Difference
Amended July 2008 quarterly	\$2,390.00	\$720.00	\$1,670.00
Amended October 2008 quarterly	\$400.00	\$250.00	\$150.00
Amended 30 Day After, Nov. 2008 General Election	\$3,345.00	\$1,170.00	\$2,175.00
Amended October 2009 quarterly	\$850.00	\$650.00	\$200.00
Amended January 2010 quarterly	\$400.00	\$350.00	\$50.00

Contributions \$100 or less reported inaccurately			
Report	Reported aggregate contributions \$100 or less	Actual contributions \$100 or less in official depository account	Difference
Amended April 2010 quarterly	\$300.00	\$0.00	\$300.00
		TOTAL	\$4,545.00

24. Respondents inaccurately reported the following contributions and/or miscellaneous receipts of more than \$100:

a. Reported a \$1,000 contribution from John Bardgett as a \$500 contribution on the amended 8 Day Before November 2008 general election;

b. Reported a \$105.13 refund from Hilton St. Louis as a contribution in that amount from Hilton St. Louis;

25. Respondents reported a \$650 contribution as coming from “unknown,” and reported a \$325 contribution as coming from “unknown,” on the amended 8 Day Before and 30 Day After 2008 Primary reports.

26. Respondents failed to report the address and/or employer for 92 contributions totaling \$53,225 as follows:

Reported contributions lacking address and/or employer information				
Contributor	Amount	Report	address	employer
Alison Martin	\$250.00	Amended July 2008 quarterly	Yes	No
Richard Martin	\$350.00	Amended July 2008 quarterly	Yes	No
Consulting Engineers Council of MO/PAC	\$200.00	Amended July 2008 quarterly	No	N/A
J.C. Kuessner and Patti Kuessner	\$200.00	Amended July 2008 quarterly	Yes	No
Julie Gibson & Bill Shoehigh	\$325.00	Amended July 2008 quarterly	Yes	No

Reported contributions lacking address and/or employer information				
Contributor	Amount	Report	address	employer
Michael and Nancy Hartman	\$200.00	Amended July 2008 quarterly	Yes	No
William P Svancarek MD	\$325.00	Amended July 2008 quarterly	Yes	No
WPC EMPAC	\$500.00	Amended July 2008 quarterly	No	N/A
Lonzo and Francis Coleman	\$500.00	Amended July 2008 quarterly	Yes	No
Terri Coburn	\$200.00	Amended July 2008 quarterly	Yes	No
Jeannette P Ward	\$200.00	Amended 8 Day Before Primary 2008	Yes	No
Timothy or Elaine Mahood	\$675.00	Amended 8 Day Before Primary 2008	Yes	No
David B Price Jr. and Joyce Price	\$200.00	Amended 8 Day Before Primary 2008	Yes	No
Billy Boykins	\$250.00	Amended 8 Day Before Primary 2008	Yes	No
Andre Walker	\$250.00	Amended 8 Day Before Primary 2008	Yes	No
Jerome and Cindy Shaw	\$500.00	Amended 8 Day Before Primary 2008	Yes	No
Robert and Pamela Affholder	\$500.00	Amended 8 Day Before Primary 2008	Yes	No
Rachelle Rowe	\$200.00		Yes	No
Ben McMillan	\$150.00	Amended 8 Day Before Primary 2008	Yes	No
Joan G Botwinick	\$200.00	Amended 8 Day Before Primary 2008	Yes	No
UFCW Local 655 Elect Pol Fun	\$650.00	Amended 8 Day Before Primary 2008	No	N/A
Sterling S Miller	\$350.00	Amended 8 Day Before Primary 2008	Yes	No
Joann Williams	\$200.00	Amended 8 Day Before Primary 2008	Yes	No
Margaret Pedersen	\$300.00	Amended 8 Day Before Primary 2008	Yes	No
Susan Talve and James Stone Goodman	\$200.00	Amended 8 Day Before Primary 2008	Yes	No
Angelia M Elgin	\$500.00	Amended 8 Day Before Primary 2008	Yes	No
Maida J Coleman	\$150.00	Amended 8 Day Before Primary 2008	Yes	No

Reported contributions lacking address and/or employer information				
Contributor	Amount	Report	address	employer
Maida Jean Coleman	\$675.00	Amended 8 Day Before Primary 2008	Yes	No
18th Senatorial District Democratic Committee	\$500.00	Amended 30 Day After Primary 2008	No	N/A
14th Senate District Democratic Committee	\$3,000.00	Amended 30 Day After Primary 2008	No	N/A
Robert and Colleen Millstone	\$675.00	Amended 30 Day After Primary 2008	Yes	No
Larry P King	\$300.00	Amended 30 Day After Primary 2008	Yes	No
Barry Burke	\$200.00	Amended 30 Day After Primary 2008	Yes	No
Jack Allison or Deborah Allison	\$300.00	Amended 30 Day After Primary 2008	Yes	No
Keith Burdick	\$500.00	Amended 30 Day After Primary 2008	Yes	No
Steven R Carroll Angela Beth Carroll	\$675.00	Amended 30 Day After Primary 2008	Yes	No
UFCW Local 655 Elect Pol Fun	\$650.00	Amended October 2008 quarterly	No	N/A
Philip M Hess	\$300.00	Amended October 2008 quarterly	Yes	No
Kenneth K Vuylsteke	\$625.00	Amended October 2008 quarterly	Yes	No
Northport Health Services of Missouri LLC	\$500.00	Amended October 2008 quarterly	No	N/A
Tricia Ann Workman	\$500.00	Amended October 2008 quarterly	Yes	No
Jeff Smith	\$500.00	Amended 8 Day Before General 2008	Yes	No
Janet Rainford and Jeff Rainford	\$250.00	Amended 8 Day Before General 2008	Yes	No
Missouri Physical Therapy of MO PAC	\$500.00	Amended 8 Day Before General 2008	No	N/A
Union Pacific Railroad	\$1,300.00	Amended 8 Day Before General 2008	No	N/A
Leonard S Dino Jr. & Carrie N Dino	\$1,000.00	Amended 8 Day Before General 2008	Yes	No
Missouri Association of Nurse Anesthetists	\$500.00	Amended 8 Day Before General 2008	No	N/A
PT-PAC of Missouri	\$500.00	Amended 8 Day Before General 2008	No	N/A

Reported contributions lacking address and/or employer information				
Contributor	Amount	Report	address	employer
John Bardgett & Associates Inc	\$1,000.00	Amended 8 Day Before General 2008	No	N/A
Missouri Dental Hygienist PAC	\$500.00	Amended 8 Day Before General 2008	No	N/A
D.M. or E.L. Wilson	\$200.00	Amended 30 Day After General 2008	Yes	No
Gabriel Gore & Nicole Reid Gore	\$125.00	Amended 30 Day After General 2008	Yes	No
Kathleen Ratcliffe	\$200.00	Amended 30 Day After General 2008	Yes	No
Robert N Fox Maxine Clark	\$500.00	Amended April 2009 quarterly	Yes	No
Michael A Decola	\$500.00	Amended April 2009 quarterly	Yes	No
Brotherhood of Locomotive Engineers & Trainmen Missouri PAC	\$200.00	Amended July 2009 quarterly	No	N/A
Larry Ziglar	\$200.00	Amended July 2009 quarterly	Yes	No
St Louis Labor Council AFL-CIO Project 2000	\$200.00	Amended July 2009 quarterly	No	N/A
Anheuser-Busch Cos Inc	\$1,350.00	Amended July 2009 quarterly	No	N/A
MO Association of Nurse Anesthetists PAC	\$500.00	Amended July 2009 quarterly	No	N/A
Teamsters Local 600 Drive PAC	\$500.00	Amended July 2009 quarterly	No	N/A
PT-PAC of Missouri	\$500.00	Amended July 2009 quarterly	No	N/A
Kyna Iman	\$150.00	Amended July 2009 quarterly	Yes	No
Missouri National Org For Women PAC	\$250.00	Amended October 2009 quarterly	No	N/A
Timm Properties LLC Wendy Timm	\$200.00	Amended October 2009 quarterly	No	No
Legacy Building Group LLC	\$1,000.00	Amended October 2009 quarterly	No	N/A
John Bardgett & Associates Inc	\$1,000.00	Amended October 2009 quarterly	No	N/A
Auer Associates Inc	\$200.00	Amended October 2009 quarterly	No	N/A
Home Building Industry PAC	\$675.00	Amended October 2009 quarterly	No	N/A

Reported contributions lacking address and/or employer information				
Contributor	Amount	Report	address	employer
Missouri Association of Rehabilitation Facilities	\$500.00	Amended October 2009 quarterly	No	N/A
MO Association of Nurse Anesthetists PAC	\$675.00	Amended October 2009 quarterly	No	N/A
Keith Burdick	\$350.00	Amended October 2009 quarterly	Yes	No
Robert P Walsh	\$200.00	Amended October 2009 quarterly	Yes	No
PT-PAC of Missouri	\$675.00	Amended October 2009 quarterly	No	No
Maurice A Watson	\$200.00	Amended October 2009 quarterly	Yes	No
Stone, Leyton & Gershman	\$2,500.00	Amended October 2009 quarterly	No	No
Don M Holt	\$150.00	Amended January 2010 quarterly	Yes	No
Missouri Dental Hygienist PAC	\$500.00	Amended January 2010 quarterly	No	N/A
John J and Maureen B Riffle	\$500.00	Amended April 2010 quarterly	Yes	No
Monsanto Company	\$500.00	Amended July 2010 quarterly	No	N/A
PFHC PAC	\$2,000.00	Amended July 2010 quarterly	No	N/A
Dealers Interested In Government	\$1,000.00	Amended July 2010 quarterly	No	N/A
Penn National Gaming Inc	\$500.00	Amended July 2010 quarterly	No	N/A
PT-PAC of Missouri	\$500.00	Amended April 2011 quarterly	No	N/A
Sterling S Miller	\$500.00	Amended July 2011 quarterly	Yes	No
EL Bertha Boatman	\$5,000.00	Amended July 2011 quarterly	Yes	No
Steven Patricia Boyers	\$3,000.00	Amended July 2011 quarterly	Yes	No
Pearlie Evans	\$500.00	Amended October 2011 quarterly	Yes	No
Terry Jones	\$500.00	Amended October 2011 quarterly	Yes	No
James Mangelsdorf	\$200.00	Amended October 2011 quarterly	Yes	No

Reported contributions lacking address and/or employer information				
Contributor	Amount	Report	address	employer
Robert Fox	\$200.00	Amended October 2011 quarterly	Yes	No
Kathleen Ratcliffe	\$150.00	Amended October 2011 quarterly	Yes	No
Total	\$53,225.00			

COUNT IV

Failure to timely and accurately report expenditures and contributions made

27. Respondents failed to timely disclose the following \$148,833.55 in expenditures:

Expenditures Not Reported		
Payee	Date	Amount
Fed Ex Kinkos	6/2/2008	\$40.95
Damon A Jones	6/2/2008	\$102.00
Ink Spot	6/2/2008	\$118.52
Glen Burlugh	6/3/2008	\$27.02
Office Max	6/5/2008	\$235.86
Cheryl Dozer	6/7/2008	\$50.00
Office Max	6/9/2008	\$43.09
Ink Spot	6/9/2008	\$346.45
Cash	6/12/2008	\$120.00
Office Max	6/17/2008	\$103.09
Home Depot	6/17/2008	\$111.11
Tonya Finley	6/18/2008	\$100.00
Par or Better	6/19/2008	\$100.00
WPC	6/19/2008	\$120.00
AT&T	6/20/2008	\$91.37
Sprint ach Bill Pay	6/20/2008	\$145.00
AT&T	6/20/2008	\$421.24
O.R. Pechman	6/20/2008	\$457.90
Cashier Check Fee	6/23/2008	\$2.00
Cash	6/23/2008	\$150.00
Cash	6/23/2008	\$1,620.00
Extra Space Storage	6/24/2008	\$163.00
Ink Spot	6/24/2008	\$712.32
Michael Henderson	6/25/2008	\$600.00
O.R. Pechman	6/26/2008	\$1,198.62
Tonya Finley	6/30/2008	\$100.00
Office Max	7/1/2008	\$52.01
Office Max	7/1/2008	\$98.70

Expenditures Not Reported		
Payee	Date	Amount
Cash	7/3/2008	\$120.00
Office Max	7/14/2008	\$60.50
Cash	7/15/2008	\$100.00
St Louis Pro-Sort	7/16/2008	\$3,875.03
Damon A Jones	7/18/2008	\$100.00
Wireless Store	7/21/2008	\$26.88
Cash	7/21/2008	\$200.00
Harland Clarke	7/22/2008	\$7.08
John Bowman	7/23/2008	\$100.00
Sprint ach Bill Pay	7/23/2008	\$163.51
AT&T	7/24/2008	\$740.62
Cash Disbursed	7/24/2008	\$1,800.00
Corporate Checking	7/25/2008	\$1,118.65
Cash Disbursed	7/26/2008	\$400.00
Steve Chalmers	7/29/2008	\$100.00
Cash	7/30/2008	\$200.00
Lingridge Trading	8/1/2008	\$1,000.00
Cash	8/2/2008	\$350.00
O.R. Pechman	8/4/2008	\$508.73
Cash	8/4/2008	\$750.00
DaVita Hanson	8/4/2008	\$1,000.00
Committee to Elect Jeff Hardin	8/5/2008	\$175.00
Cash	8/5/2008	\$1,800.00
Inkosi Design	8/5/2008	\$2,100.00
Jasmine Cannon	8/6/2008	\$100.00
19th Ward Reg Democratic	8/6/2008	\$150.00
Original 27th Ward Org	8/7/2008	\$300.00
Ink Spot	8/7/2008	\$2,211.00
Calvin Walker	8/8/2008	\$100.00
MCB	8/12/2008	\$20.00
World's Fair Donuts	8/12/2008	\$56.00
Office Max	8/12/2008	\$65.92
Creative Litho	8/12/2008	\$286.84
Creative Litho	8/12/2008	\$681.92
Pappy's Smokehouse	8/14/2008	\$26.47
Drake Plaza	8/14/2008	\$40.00
Kohner Drake Plaza	8/14/2008	\$1,501.00
Clear Channel	8/15/2008	\$300.00
Cash	8/16/2008	\$100.00
Cash	8/16/2008	\$100.00
Exxon Mobile	8/18/2008	\$43.74
Sprint ach Bill Pay	8/20/2008	\$165.04

Expenditures Not Reported		
Payee	Date	Amount
The Best Steak House	8/21/2008	\$26.93
Extra Space Storage	8/21/2008	\$163.00
Burger Bar	8/22/2008	\$52.00
Cash	8/22/2008	\$600.00
Dollar Tree	8/23/2008	\$23.23
Applebee's	8/25/2008	\$48.57
Frontier AG	8/26/2008	\$57.84
Sleep Inn	8/27/2008	\$26.50
Willie G's	8/27/2008	\$80.00
Sleep Inn	8/27/2008	\$530.02
Pappa Deaux Seafood Kitchen	8/28/2008	\$45.00
Sleep Inn	9/1/2008	\$570.96
Sleep Inn	9/1/2008	\$713.70
BP	9/5/2008	\$45.97
Home Town Buffet	9/7/2008	\$36.11
AT&T	9/8/2008	\$424.13
AT&T	9/8/2008	\$543.93
Drake Plaza Apts.	9/8/2008	\$950.00
JCT Fuel and Grocery	9/9/2008	\$36.45
DaVita Hanson	9/9/2008	\$300.00
Damon A Jones	9/9/2008	\$500.00
Office Max	9/12/2008	\$146.98
4th Ward Reg Dems	9/12/2008	\$300.00
Barnes and Noble	9/13/2008	\$76.29
BP	9/15/2008	\$30.01
Cheryl Dozer	9/15/2008	\$100.00
John Bowman	9/15/2008	\$700.00
The Fountain	9/18/2008	\$45.00
Office Max	9/18/2008	\$247.90
AT&T	9/18/2008	\$388.56
Target	9/19/2008	\$14.43
Office Max	9/19/2008	\$177.47
DaVita Hanson	9/19/2008	\$750.00
Smitty's	9/20/2008	\$45.01
Home Depot	9/22/2008	\$30.54
MO Progressive Vote	9/22/2008	\$100.00
AT&T	9/22/2008	\$123.69
MO Jobs with Justice	9/22/2008	\$150.00
Home Depot	9/22/2008	\$176.87
National Black Caucus of State Legislators	9/22/2008	\$475.00
Deebru Shurn	9/22/2008	\$500.00

Expenditures Not Reported		
Payee	Date	Amount
Extra Space Storage	9/23/2008	\$174.00
Cash	9/25/2008	\$125.00
Cash	9/25/2008	\$125.00
Citizens for Mike McMillan	9/25/2008	\$200.00
Home Depot	9/25/2008	\$465.11
Damon A Jones	9/25/2008	\$500.00
International Institute	9/26/2008	\$17.50
Shell	9/27/2008	\$49.08
Barnes and Noble	9/28/2008	\$79.54
Office Max	9/29/2008	\$92.01
Walter Knoll Florist	9/29/2008	\$143.12
Randy Echels	9/29/2008	\$425.00
John Bowman	9/30/2008	\$1,300.00
Vito's Restaurant	10/1/2008	\$31.35
BP	10/1/2008	\$35.00
Tonya Finley	10/1/2008	\$100.00
Firebrick Consulting	10/1/2008	\$457.41
Target	10/2/2008	\$13.30
Applebee's	10/2/2008	\$77.56
Home Depot	10/2/2008	\$77.79
White Castle	10/3/2008	\$27.53
Firebrick Consulting	10/3/2008	\$258.30
Schnucks Market	10/4/2008	\$66.03
Schnucks Market	10/4/2008	\$304.85
BP	10/5/2008	\$44.57
Office Max	10/5/2008	\$269.32
Willie Brown	10/6/2008	\$225.00
Home Depot	10/7/2008	\$9.72
Schnucks Market	10/7/2008	\$12.28
CBTU - Coalition of Black Trade University	10/7/2008	\$30.00
BP	10/7/2008	\$44.74
Drake Plaza Apts.	10/7/2008	\$950.00
Rally's Hamburgers	10/8/2008	\$12.24
The U	10/8/2008	\$29.14
Amtrak	10/8/2008	\$549.00
Panera Bread	10/9/2008	\$8.22
DaVita Hanson	10/10/2008	\$750.00
Steve Chalmers	10/10/2008	\$1,000.00
The Best Steak House	10/11/2008	\$40.43
Panera Bread	10/11/2008	\$48.32
Smitty's	10/13/2008	\$36.83

Expenditures Not Reported		
Payee	Date	Amount
Ameren	10/14/2008	\$105.00
St Louis City Labor Club	10/14/2008	\$200.00
McDonald's	10/15/2008	\$9.27
USPS	10/15/2008	\$17.80
Kmart	10/15/2008	\$121.43
Sprint ach Bill Pay	10/15/2008	\$185.00
Damon A Jones	10/15/2008	\$500.00
DaVita Hanson	10/15/2008	\$1,000.00
Office Max	10/16/2008	\$23.63
Schnucks Market	10/16/2008	\$35.01
WSJ.com or Barrons.com	10/16/2008	\$89.00
Hilton	10/16/2008	\$132.09
John Bowman	10/20/2008	\$2,500.00
City of St Louis	10/21/2008	\$10.00
City of St Louis	10/21/2008	\$10.00
Extra Space Storage	10/21/2008	\$174.00
Baker for Congress	10/21/2008	\$750.00
Cash	10/22/2008	\$100.00
Parking Division - L C Williams	10/22/2008	\$450.00
Missouri House Democratic Campaign Committee	10/22/2008	\$750.00
Rally's Hamburgers	10/23/2008	\$11.88
MPC 44	10/23/2008	\$35.91
Judi Sharp	10/23/2008	\$84.78
St Alphonsus Church	10/23/2008	\$125.00
Costco	11/3/2008	\$511.28
Vernon Johnson	11/18/2008	\$75.00
Convenient Food Mart	12/2/2008	\$28.14
Pick A Dilly	12/8/2008	\$21.10
BP	12/8/2008	\$30.37
Citizens for Ortman	12/9/2008	\$100.00
Hilton	12/10/2008	\$105.13
MPC 44	1/1/2009	\$25.96
Mid America Coaches	1/3/2009	\$686.00
Franklin Covey	1/5/2009	\$32.07
Cash	1/5/2009	\$1,410.00
Ameren	1/16/2009	\$101.74
Transfer to Share	1/20/2009	\$10.00
Sprint ach Bill Pay	1/22/2009	\$149.00
QT	1/26/2009	\$26.00
Extra Space Storage	1/27/2009	\$89.00
Exxon Mobile	1/31/2009	\$19.93

Expenditures Not Reported		
Payee	Date	Amount
Schnucks Market	2/1/2009	\$51.35
Exxon Mobile	2/2/2009	\$25.73
AT&T	2/2/2009	\$351.60
Office Max	2/7/2009	\$15.23
Exxon Mobile	2/7/2009	\$25.67
Cash	2/27/2009	\$50.00
DaVita Hanson	3/2/2009	\$250.00
AT&T	3/3/2009	\$180.00
Holiday Inn	3/9/2009	\$211.44
Schnucks Market	3/18/2009	\$137.51
DaVita Hanson	3/20/2009	\$250.00
Scott Joplin House	3/21/2009	\$550.00
Drake Plaza Apts.	3/23/2009	\$426.00
AT&T	3/24/2009	\$60.00
Sprint ach Bill Pay	3/24/2009	\$175.00
AT&T	3/24/2009	\$220.00
Ameren	3/26/2009	\$227.00
Ameren	3/29/2009	\$263.50
Park Tickets 444	3/31/2009	\$100.00
PWW	4/3/2009	\$350.00
Damon A Jones	4/15/2009	\$200.00
Office Max	4/17/2009	\$28.13
Schnucks Market	4/17/2009	\$38.28
Exxon Mobile	4/18/2009	\$22.45
Shell	4/20/2009	\$6.87
Shell	4/20/2009	\$35.01
John Bowman	4/20/2009	\$36.00
Schnucks Market	4/22/2009	\$48.48
Walgreens	4/23/2009	\$17.77
ABC Trading Wholesale	4/26/2009	\$98.70
Extra Space Storage	4/28/2009	\$95.00
MPC 44	4/29/2009	\$37.87
Eagle Stop	4/30/2009	\$20.26
BP	5/3/2009	\$42.18
DaVita Hanson	5/4/2009	\$100.00
Exxon Mobile	5/9/2009	\$26.81
Credit Protection	5/10/2009	\$293.55
DaVita Hanson	5/11/2009	\$350.00
Office Max	5/12/2009	\$72.93
Parking Division - L C Williams	5/12/2009	\$450.00
Smittys	5/13/2009	\$33.57
Joes Lion Service	5/18/2009	\$19.95

Expenditures Not Reported		
Payee	Date	Amount
Holts Summit	5/18/2009	\$24.68
QT	5/19/2009	\$51.42
BJ Foundation	5/19/2009	\$1,000.00
Exxon Mobile	5/20/2009	\$60.15
Cash	5/20/2009	\$100.00
Provisions	5/21/2009	\$22.96
Schnucks Market	5/21/2009	\$28.44
Sprint ach Bill Pay	5/21/2009	\$250.00
AT&T	5/22/2009	\$88.56
AT&T	5/22/2009	\$250.00
Amtrak	5/23/2009	\$6.00
Schnucks Market	5/23/2009	\$14.10
BP	5/23/2009	\$44.70
Whole Foods Market	5/23/2009	\$110.40
Office Max	5/23/2009	\$127.51
Extra Space Storage	5/26/2009	\$75.00
Ameren	5/26/2009	\$107.67
Ronnie Richardson & Assocs.	6/1/2009	\$1,500.00
Amoco	6/6/2009	\$15.38
ATM	6/6/2009	\$102.00
Payless Shoesource	6/13/2009	\$33.77
Cash	6/16/2009	\$100.00
ATM withdraw fee	6/21/2009	\$1.00
ATM	6/21/2009	\$102.00
Cash	6/25/2009	\$250.00
DaVita Hanson	7/1/2009	\$1,500.00
Ronnie Richardson & Assocs.	7/2/2009	\$1,500.00
Schnucks Market	7/3/2009	\$10.73
BP	7/3/2009	\$51.80
Shop 'N Save	7/3/2009	\$99.11
Lane Bryant	7/4/2009	\$16.31
JC Penny Store	7/4/2009	\$60.35
Schnucks Market	7/5/2009	\$36.22
Office Max	7/5/2009	\$283.95
Schnucks Market	7/6/2009	\$62.48
Sunglass Hut	7/6/2009	\$141.09
AT&T	7/7/2009	\$317.61
Triumph Grill	7/8/2009	\$58.44
QT	7/9/2009	\$17.59
ATM withdraw fee	7/10/2009	\$1.00
BP	7/10/2009	\$32.00
Friends of Kacie Starr Triplett	7/10/2009	\$100.00

Expenditures Not Reported		
Payee	Date	Amount
Gordon Biersch-Kansas	7/10/2009	\$110.00
ATM	7/10/2009	\$202.95
ATM withdraw fee	7/12/2009	\$1.00
BP	7/12/2009	\$24.57
ATM	7/12/2009	\$62.95
Marriott Hotels	7/12/2009	\$789.18
Marriott Hotels	7/13/2009	\$50.00
Marriott Hotels	7/14/2009	\$15.00
Harland Clarke	7/14/2009	\$17.00
BP	7/14/2009	\$38.00
Reliable Funeral Home	7/14/2009	\$250.00
Missouri Legislative Black Caucus Foundation	7/15/2009	\$600.00
Harland Clarke	7/16/2009	\$10.14
Alex's Rest & Lounge	7/17/2009	\$115.00
AT&T	7/17/2009	\$429.35
Vito's Restaurant	7/18/2009	\$34.42
Holts Summit	7/18/2009	\$41.62
Capitol Plaza	7/18/2009	\$77.51
Cheryl Dozer	7/19/2009	\$200.00
Office Max	7/20/2009	\$92.52
Harmony Grand Chapter OES	7/20/2009	\$400.00
Extra Space Storage	7/26/2009	\$96.00
Extra Space Storage	7/30/2009	\$74.00
Hobby Lobby	7/30/2009	\$116.34
QT	7/31/2009	\$62.71
Red Lobster	8/2/2009	\$70.00
John Bowman	8/3/2009	\$100.00
State Chapter of Senior Citizens	8/4/2009	\$100.00
Missouri Democratic Party	8/4/2009	\$200.00
DaVita Hanson	8/4/2009	\$1,500.00
MO Kan	8/5/2009	\$175.00
Radio WGNU	8/5/2009	\$200.00
Better Family Life	8/5/2009	\$275.00
Ronnie Richardson & Assocs.	8/5/2009	\$1,500.00
Suw Unique Garden Club	8/6/2009	\$1,000.00
Hooters	8/7/2009	\$50.00
The Organization for Black Struggle	8/7/2009	\$150.00
White Castle	8/10/2009	\$9.50
BP	8/10/2009	\$51.68
Gateway Alarm	8/10/2009	\$69.00

Expenditures Not Reported		
Payee	Date	Amount
SEIU	8/10/2009	\$1,000.00
CSI Telecommunication	8/11/2009	\$1,000.00
Smoking Joes	8/13/2009	\$30.00
Distinctions	8/13/2009	\$1,664.33
QVC	8/17/2009	\$96.43
BP	8/21/2009	\$48.20
AT&T	8/21/2009	\$399.32
Walgreens	8/22/2009	\$17.74
Exxon Mobile	8/22/2009	\$33.92
Jasance Razland	8/25/2009	\$125.00
St James AME Church	8/25/2009	\$750.00
Forever 21	8/26/2009	\$28.98
Sears	8/26/2009	\$39.68
Extra Space Storage	8/27/2009	\$74.00
ABC Trading Wholesale	8/27/2009	\$82.65
Schaeffer's Hobby	8/28/2009	\$7.91
Lane Bryant	8/28/2009	\$44.91
Schnucks Market	8/28/2009	\$73.68
Office Max	8/28/2009	\$162.34
Office Max	8/28/2009	\$386.37
Target	8/29/2009	\$37.87
Smittys	8/29/2009	\$44.95
USPS	8/29/2009	\$55.00
Lubeleys Bakery	8/31/2009	\$77.87
McMahon Pontiac	8/31/2009	\$89.66
Party City	8/31/2009	\$113.00
Sprint ach Bill Pay	9/2/2009	\$266.12
WGNU	9/2/2009	\$800.00
BP	9/4/2009	\$46.62
Jasance Razland	9/4/2009	\$400.00
DaVita Hanson	9/4/2009	\$3,650.00
Red Lobster	9/5/2009	\$47.88
Office Max	9/6/2009	\$31.34
Schnucks Market	9/6/2009	\$31.76
Pick A Dilly	9/7/2009	\$5.19
Pick A Dilly	9/7/2009	\$35.25
Ameren	9/8/2009	\$135.59
John Bowman	9/9/2009	\$1,977.00
Political Resource & Solutions	9/9/2009	\$2,500.00
Schnucks Market	9/10/2009	\$55.54
Office Max	9/10/2009	\$135.79
Cash	9/10/2009	\$150.00

Expenditures Not Reported		
Payee	Date	Amount
Target	9/11/2009	\$35.31
Whole Foods Market	9/12/2009	\$30.93
Bob J Leach Inc.	9/12/2009	\$45.76
Dillard's	9/12/2009	\$97.04
White Castle	9/14/2009	\$13.84
Schnucks Market	9/14/2009	\$14.87
Exxon Mobile	9/16/2009	\$44.45
Distinctions	9/16/2009	\$125.00
Schnucks Market	9/17/2009	\$82.91
Garden Ridge Store	9/17/2009	\$84.62
QVC	9/17/2009	\$96.43
Cheryl Dozer	9/17/2009	\$200.00
Capitol Plaza	9/18/2009	\$77.51
AT&T Cons Phone	9/18/2009	\$147.64
AT&T Cons Phone	9/18/2009	\$449.20
McDonald's	9/19/2009	\$21.18
Captain Ds	9/19/2009	\$43.85
MPC 44	9/19/2009	\$44.50
The Ink Spot	9/19/2009	\$149.78
Parties and Props	9/19/2009	\$400.00
Weinhardt Party	9/20/2009	\$43.30
Party City	9/20/2009	\$48.47
Extra Space Storage	9/21/2009	\$74.00
Cheryl Dozer	9/21/2009	\$200.00
TLF Walter Knoll	9/22/2009	\$349.75
Jasance Razland	9/22/2009	\$746.78
Ronnie Richardson & Assocs.	9/24/2009	\$1,500.00
BP	9/25/2009	\$37.68
Exxon Mobile	9/28/2009	\$14.00
Tridel Enterprises US	9/29/2009	\$36.34
QT	9/29/2009	\$38.35
Courtyard Marriott	9/29/2009	\$74.32
AT&T	9/29/2009	\$80.00
Original 21st Ward Dem Org	9/29/2009	\$100.00
Ameren	9/30/2009	\$70.80
The Peach Tree	10/1/2009	\$45.10
Break time	10/1/2009	\$47.14
MADCO Printing	10/1/2009	\$700.00
Ozark Oil Co	10/2/2009	\$43.63
Rolla Eagle Stop	10/4/2009	\$6.11
Exxon Mobile	10/4/2009	\$15.00
Naturalizer Shoe Store	10/5/2009	\$80.87

Expenditures Not Reported		
Payee	Date	Amount
Chateau on the Lake	10/6/2009	\$8.00
Intercontinental	10/7/2009	\$273.44
Marmi #1	10/7/2009	\$306.07
Office Depot	10/8/2009	\$74.46
Smittys	10/9/2009	\$45.96
Schnucks Market	10/10/2009	\$34.79
Dillard's	10/10/2009	\$42.05
Dillard's	10/10/2009	\$191.93
Dillard's	10/10/2009	\$277.11
Home Town Buffet	10/13/2009	\$24.56
TLF Walter Knoll	10/13/2009	\$104.70
Office Max	10/14/2009	\$11.88
Sprint Wireless	10/14/2009	\$177.87
Community Women Against Hardship	10/15/2009	\$100.00
WSJ.com or Barrons.com	10/16/2009	\$129.00
QT	10/17/2009	\$41.33
QVC	10/18/2009	\$96.43
BP	10/19/2009	\$50.01
Doubletree Hotel	10/19/2009	\$98.10
Sofitel Hotels	10/19/2009	\$706.26
SEIU MO/KS State Council 29	10/20/2009	\$5,026.18
Schnucks Market	10/21/2009	\$55.64
Schnucks Market	10/21/2009	\$60.00
Dillard's	10/21/2009	\$94.89
Sofitel Hotels	10/24/2009	\$45.00
Chico's	10/24/2009	\$114.65
McCormick & Schmick's	10/26/2009	\$18.00
Extra Space Storage	10/26/2009	\$74.00
Borders Books	10/26/2009	\$81.52
Sofitel Hotels	10/26/2009	\$85.00
Grill on the Alley	10/27/2009	\$16.00
Sprint ach Bill Pay	10/27/2009	\$390.60
Ingrid Owens	10/28/2009	\$120.00
Ronnie Richardson & Assocs.	10/29/2009	\$1,000.00
AT&T	10/30/2009	\$410.91
MPC 44	10/31/2009	\$51.00
QT	11/1/2009	\$50.50
Angie's List	11/2/2009	\$59.00
Collective Catering	11/2/2009	\$266.66
BP	11/3/2009	\$17.26
Northside Community Center	11/3/2009	\$600.00

Expenditures Not Reported		
Payee	Date	Amount
BP	11/4/2009	\$38.49
QT	11/5/2009	\$22.27
BP	11/6/2009	\$32.00
Joes Lion Service	11/7/2009	\$19.95
Chili's	11/7/2009	\$33.00
Exxon Mobile	11/7/2009	\$51.86
Target	11/11/2009	\$50.76
Red Lobster	11/12/2009	\$116.03
WGNU	11/13/2009	\$800.00
BP	11/14/2009	\$48.75
Holts Summit	11/17/2009	\$6.72
Holts Summit	11/17/2009	\$25.86
Ronnie Richardson & Assocs.	11/17/2009	\$1,500.00
Allen Hortin	11/18/2009	\$33.33
Office Max	11/18/2009	\$154.67
Airtran	11/20/2009	\$272.40
BP	11/23/2009	\$52.84
SK Jewelers	11/23/2009	\$102.19
Katie Ann Foundation	11/23/2009	\$250.00
Marquards Cleaners	11/24/2009	\$84.30
Medical West Health	11/25/2009	\$45.17
Extra Space Storage	11/25/2009	\$74.00
Phillips 66	11/27/2009	\$7.65
Holts Summit	11/28/2009	\$49.83
Convenient Food Mart	11/30/2009	\$13.48
Convenient Food Mart	11/30/2009	\$50.85
Ruby Tuesday	12/2/2009	\$48.44
Rosco's Family	12/4/2009	\$27.38
QT	12/5/2009	\$19.28
National Black Caucus of State Legislators	12/5/2009	\$575.00
Exxon Mobile	12/7/2009	\$41.96
Cheryl Dozer	12/7/2009	\$400.00
Citizens for Ortman	12/8/2009	\$100.00
ATM withdraw fee	12/9/2009	\$1.00
ATM	12/9/2009	\$43.25
Holts Summit	12/10/2009	\$43.54
Sprint ACH Bill Pay	12/10/2009	\$232.84
White Castle	12/11/2009	\$11.99
Hibachi	12/13/2009	\$18.11
BP	12/13/2009	\$50.56
Vito's Restaurant	12/14/2009	\$25.00

Expenditures Not Reported		
Payee	Date	Amount
AT&T	12/14/2009	\$143.36
Walgreens	12/14/2009	\$213.30
AT&T	12/14/2009	\$681.71
ATM withdraw fee	12/15/2009	\$1.00
ATM	12/15/2009	\$20.00
Convenient Food Mart	12/15/2009	\$31.62
McDonald's	12/17/2009	\$12.28
Walker Pearson	12/17/2009	\$300.00
White Castle	12/19/2009	\$13.36
Home Town Buffet	12/20/2009	\$36.74
Whole Foods Market	12/20/2009	\$221.12
ATM withdraw fee	12/21/2009	\$1.00
ATM	12/21/2009	\$43.00
BP	12/21/2009	\$47.50
MPC 44	12/21/2009	\$47.77
Panera Bread	12/22/2009	\$22.64
Schnucks Market	12/22/2009	\$79.95
GameStop	12/22/2009	\$100.00
White Castle	12/23/2009	\$13.99
Schnucks Market	12/23/2009	\$23.46
Borders Books	12/23/2009	\$98.39
Sprint ach Bill Pay	12/23/2009	\$211.49
Target	12/23/2009	\$217.12
Parking Division - L C Williams	12/23/2009	\$450.00
Ronnie Richardson & Assocs.	12/24/2009	\$1,500.00
WGNU	12/24/2009	\$1,600.00
BP	12/29/2009	\$50.84
Vincent's Jeweler	12/30/2009	\$20.59
Oscar's Café	12/30/2009	\$30.00
Schnucks Market	12/31/2009	\$186.41
AT&T Bus Phone	1/4/2010	\$205.65
Gateway Alarm	1/8/2010	\$342.00
Schnucks Market	1/9/2010	\$134.74
Journal Entry	1/11/2010	\$120.00
John Bardgett & Assoc.	1/11/2010	\$1,000.00
Extra Space Storage	1/21/2010	\$79.00
Schnucks Market	1/24/2010	\$9.20
Schnucks Market	1/24/2010	\$93.49
AT&T Bus Phone	1/25/2010	\$395.66
Phillips 66	1/28/2010	\$4.09
WGNU	1/28/2010	\$1,000.00
Holts Summit	1/29/2010	\$45.70

Expenditures Not Reported		
Payee	Date	Amount
Garden Ridge Store	1/29/2010	\$146.68
Hobby Lobby	1/29/2010	\$174.90
Cheryl Dozer	1/29/2010	\$400.00
Phillip Berry	2/1/2010	\$350.00
BP	2/2/2010	\$45.34
QT	2/3/2010	\$47.25
Sprint ach Bill Pay	2/3/2010	\$199.27
Schnucks Market	2/5/2010	\$120.49
QT	2/7/2010	\$35.12
Ameren	2/9/2010	\$225.10
Friends of Kacie Starr Triplett	2/9/2010	\$366.00
John Bowman	2/12/2010	\$100.00
BP	2/13/2010	\$45.91
Petro	2/18/2010	\$6.76
Exxon Mobile	2/18/2010	\$37.68
Exxon Mobile	2/21/2010	\$14.00
House Inner Circle	2/23/2010	\$20.00
Sasha's on Shaw LLC	2/23/2010	\$30.00
Citizens for John Haigler	2/23/2010	\$250.00
Extra Space Storage	2/25/2010	\$79.00
USPS	2/26/2010	\$55.00
Sprint ach Bill Pay	2/26/2010	\$160.00
QT	2/27/2010	\$45.71
Lafayette Fire Comp.	2/27/2010	\$46.00
Schnucks Market	3/2/2010	\$31.46
The Women's Safe House	3/2/2010	\$365.00
Pick A Dilly	3/4/2010	\$3.43
Evelyn Thomas	3/4/2010	\$37.00
Sprint ach Bill Pay	3/4/2010	\$77.47
Office Max	3/5/2010	\$25.37
Pick A Dilly	3/5/2010	\$35.91
Crown Food Mart	3/22/2010	\$46.66
Sprint PCS	3/25/2010	\$53.86
Sprint PCS	3/25/2010	\$205.00
Crown Food Mart	3/26/2010	\$50.23
Stand up for Power	3/26/2010	\$300.00
Extra Space Storage	4/1/2010	\$80.00
Wal-Mart	4/4/2010	\$136.81
Crown Food Mart	4/5/2010	\$57.53
White Castle	4/6/2010	\$6.92
AT&T Cons Phone	4/6/2010	\$143.23
AT&T Bus Phone	4/6/2010	\$171.14

Expenditures Not Reported		
Payee	Date	Amount
AT&T Cons Phone	4/6/2010	\$433.59
Lees Chicken	4/8/2010	\$9.14
Schnucks Market	4/9/2010	\$1.00
Schnucks Market	4/9/2010	\$43.00
QT	4/9/2010	\$54.21
Office Max	4/9/2010	\$508.71
Truman Hotel	4/10/2010	\$42.08
ABC Trading Wholesale	4/10/2010	\$50.08
Container Store	4/10/2010	\$58.56
Whole Foods Market	4/10/2010	\$64.66
Lees Chicken	4/13/2010	\$15.98
Ameren	4/13/2010	\$234.93
Gateway Alarm	4/14/2010	\$64.00
ARFAM-C of St Louis	4/14/2010	\$125.00
Convenient Food Mart	4/15/2010	\$50.82
Crown Food Mart	4/19/2010	\$47.94
Crown Food Mart	4/20/2010	\$40.82
Extra Space Storage	4/20/2010	\$79.00
BP	4/23/2010	\$58.41
Sprint ach Bill Pay	4/23/2010	\$393.61
AT&T Bus Phone	4/26/2010	\$177.84
WGNU	4/28/2010	\$1,000.00
Pick A Dilly	4/30/2010	\$39.83
Borders Books	5/3/2010	\$34.69
Committee to Elect Clem Smith	5/21/2010	\$100.00
ATM withdraw fee	5/22/2010	\$1.00
ATM	5/22/2010	\$43.00
McDonald's	5/23/2010	\$2.48
Extra Space Storage	5/26/2010	\$79.00
Whole Foods Market	5/27/2010	\$46.12
Sprint ach Bill Pay	6/2/2010	\$75.00
Fee	6/4/2010	\$15.00
Fee	6/10/2010	\$15.00
Crown Food Mart	6/19/2010	\$30.00
Schnucks Market	6/20/2010	\$43.18
Whole Foods Market	6/20/2010	\$68.13
Copy Fee from bank	6/21/2010	\$25.00
Crown Food Mart	6/21/2010	\$48.64
Clayton Specialist Dr.	6/22/2010	\$25.00
Extra Space Storage	6/23/2010	\$79.00
Office Max	7/6/2010	\$38.89
BP	7/6/2010	\$47.67

Expenditures Not Reported		
Payee	Date	Amount
Renaissance Hotels	7/12/2010	\$12.00
Staples	7/12/2010	\$35.58
Wal-Mart	7/13/2010	\$50.21
Five Guys	7/16/2010	\$20.44
Gas Mart BP	7/17/2010	\$46.14
Office Max	7/20/2010	\$39.05
Red Lobster	7/22/2010	\$55.00
Penn Station Hampton	7/25/2010	\$22.90
Captain Ds	7/27/2010	\$9.12
Five Star Senior Center	7/27/2010	\$30.00
Phillips 66	7/27/2010	\$42.56
Westland Travel	7/28/2010	\$43.03
Captain Ds	7/29/2010	\$9.76
McDonald's	7/29/2010	\$11.18
Westin Crown Center	7/29/2010	\$18.00
Walgreens	7/30/2010	\$6.40
Wal-Mart	8/3/2010	\$34.57
Whole Foods Market	8/3/2010	\$45.33
Crown Food Mart	8/7/2010	\$30.00
White Castle	8/8/2010	\$18.43
Schnucks Market	8/9/2010	\$20.91
Schnucks Market	8/9/2010	\$23.01
Crown Food Mart	8/10/2010	\$6.46
Crown Food Mart	8/10/2010	\$31.24
BP	8/14/2010	\$37.75
Exxon Mobile	8/24/2010	\$35.00
Office Max	9/24/2010	\$33.70
BP	10/5/2010	\$25.03
McDonald's	10/6/2010	\$14.28
BP	10/21/2010	\$49.67
Burger King	10/25/2010	\$5.95
Wal-Mart	10/26/2010	\$10.71
Schnucks Market	10/26/2010	\$16.48
Hobby Lobby	10/26/2010	\$26.53
Crown Food Mart	10/26/2010	\$29.24
BP	10/29/2010	\$53.89
Red Lobster	10/31/2010	\$60.00
Captain Ds	11/2/2010	\$8.89
Exxon Mobile	11/3/2010	\$18.33
Exxon Mobile	11/3/2010	\$38.26
Westland Travel	11/6/2010	\$46.76
ATM withdraw fee	11/11/2010	\$1.00

Expenditures Not Reported		
Payee	Date	Amount
New Halls Ferry	11/12/2010	\$20.68
New Halls Ferry	11/12/2010	\$53.09
Crown Food Mart	11/15/2010	\$54.99
Long Horn Steakhouse	11/18/2010	\$60.00
Westland Travel	11/19/2010	\$29.43
White Castle	11/22/2010	\$7.13
Lowe's	11/22/2010	\$25.79
Crown Food Mart	11/22/2010	\$50.20
Schnucks Market	11/22/2010	\$53.07
Schnucks Market	11/23/2010	\$46.61
Westland Travel	12/1/2010	\$48.23
Office Max	12/2/2010	\$16.26
Schnucks Market	12/4/2010	\$37.11
BP	12/4/2010	\$55.86
ATM withdraw fee	12/5/2010	\$1.00
Westland Travel	12/8/2010	\$46.12
ATM withdraw fee	12/13/2010	\$1.00
Crown Food Mart	12/16/2010	\$60.22
Marriott Hotels	12/17/2010	\$1.00
Office Depot	12/23/2010	\$30.80
Schnucks Market	12/24/2010	\$63.48
Crown Food Mart	12/25/2010	\$56.67
Westland Travel	12/28/2010	\$4.68
Westland Travel	12/29/2010	\$40.76
Office Max	1/8/2011	\$37.73
Phillips 66	1/12/2011	\$55.98
Office Max	1/15/2011	\$27.34
Crown Food Mart	1/18/2011	\$45.69
Westland Travel	1/21/2011	\$37.41
Office Max	1/22/2011	\$28.74
Amtrak	2/10/2011	\$120.20
St James AME Church	3/29/2011	\$20.00
Sprint ach Bill Pay	4/5/2011	\$50.00
Account Closed	4/8/2011	\$1,994.44
	TOTAL	\$148,833.55

28. After amending reports during the course of the Commission’s audit, Respondents still failed to disclose the following \$1,543.83 in expenditures:

Expenditures Not Reported on Amended Reports		
Payee	Date	Amount
Cash Disbursed	7/26/2008	\$400.00
Cash	7/30/2008	\$200.00
Sleep Inn	9/1/2008	\$713.70
Cash	9/25/2008	\$125.00
Hilton	12/10/2008	\$105.13
	TOTAL	\$1,543.83

29. Respondents inaccurately reported \$2,695 in expenditures greater than \$100 by failing to itemize them and instead reporting them in the general category “Campaign Gas/Food/Parking/Incidentals” as follows:

Expenditures greater than \$100 reported by category and not itemized			
Date	Payee	Amount	Reported
6/12/2008	Cash	\$120.00	Amended July 2008 Quarterly
6/23/2008	Cash	\$150.00	Amended July 2008 Quarterly
7/3/2008	Cash	\$120.00	Amended 8 Day Primary 8/5/08
7/9/2008	Dammon Jones	\$200.00	Amended 8 Day Primary 8/5/08
7/21/2008	Cash	\$200.00	Amended 8 Day Primary 8/5/08
8/5/2008	Cash	\$300.00	Amended 30 Day Primary 8/5/08
9/25/2008	Cash	\$125.00	Amended October 2008 Quarterly
6/25/2009	Cash	\$250.00	Amended July 2009 Quarterly
7/10/2009	Cash	\$200.00	Amended October 2009 Quarterly
9/10/2009	Cash	\$150.00	Amended October 2009 Quarterly
1/11/2010	Cash	\$120.00	Amended April 2010 Quarterly
11/11/2010	Cash	\$200.00	Amended April 2011 Quarterly
12/5/2010	Cash	\$360.00	Amended April 2011 Quarterly
12/13/2010	Cash	\$200.00	Amended April 2011 Quarterly
	Total	\$2,695.00	

30. Respondents inaccurately reported the aggregate of expenditures of \$100 or less by category. Specifically, between the July 2008 quarterly report and the Amended April 2011

quarterly report, Respondents actually made such expenditures aggregating \$25,314.57 but reported \$24,089.76 in such expenditures as follows:

Expenditures \$100 or less by category reported inaccurately			
Report	Reported aggregate expenditures of \$100 or less	Actual aggregate expenditures of \$100 or less in official depository account	Difference
Amended July 2008 quarterly	\$1,284.03	\$770.43	\$513.60
Amended 30 Day After Primary 2008	\$885.70	\$1,112.20	\$226.50
Amended 8 Day Before General 2008	\$939.76	\$1,039.76	\$100.00
Amended 30 Day After General 2008	\$1,210.56	\$1,950.51	\$739.95
Amended January 2009 quarterly	\$1,065.00	\$1,165.00	\$100.00
Amended April 2009 quarterly	\$1,374.45	\$1,447.45	\$73.00
Amended July 2009 quarterly	\$2,571.64	\$2,393.59	\$178.05
Amended October 2009 quarterly	\$4,008.92	\$4,305.97	\$297.05
Amended January 2010 quarterly	\$3,469.65	\$3,602.98	\$133.33
Amended April 2010 quarterly	\$1,562.13	\$1,719.13	\$157.00
Amended July 2010 quarterly	\$1,494.22	\$1,594.22	\$100.00
Amended April 2011 quarterly	\$4,223.70	\$4,213.33	\$10.37
		TOTAL	\$2,628.85

31. Respondents failed to include the address for 129 expenditures totaling \$45,558.30 as follows:

Reported expenditures lacking address and/or purpose information			
Payee	Amount	Reported	Address
Damon A Jones	\$102.00	Amended July 2008 quarterly	No
Office Max	\$235.86	Amended July 2008 quarterly	No
Cash	\$120.00	Amended July 2008 quarterly	No
Home Depot	\$111.11	Amended July 2008 quarterly	No
Office Max	\$103.09	Amended July 2008 quarterly	No
Par or Better	\$100.00	Amended July 2008 quarterly	No
WPC	\$120.00	Amended July 2008 quarterly	No
AT&T	\$421.24	Amended July 2008 quarterly	No
Sprint ACH Bill Pay	\$145.00	Amended July 2008 quarterly	No
Cash	\$1,620.00	Amended July 2008 quarterly	No
Cash	\$150.00	Amended July 2008 quarterly	No
Maurul Barns	\$144.00	Amended July 2008 quarterly	No
Orands Burns	\$144.00	Amended July 2008 quarterly	No

Reported expenditures lacking address and/or purpose information			
Payee	Amount	Reported	Address
Harold Grant	\$144.00	Amended July 2008 quarterly	No
Cash	\$120.00	Amended 8 Day Before Primary 2008	No
Sprint ach Bill Pay	\$150.00	Amended 8 Day Before Primary 2008	No
Damon A Jones	\$200.00	Amended 8 Day Before Primary 2008	No
Cash	\$200.00	Amended 8 Day Before Primary 2008	No
Office Max	\$197.92	Amended 8 Day Before Primary 2008	No
Sprint ach Bill Pay	\$163.51	Amended 8 Day Before Primary 2008	No
AT&T	\$740.62	Amended 8 Day Before Primary 2008	No
Ingrid Owens	\$300.00	Amended 8 Day Before Primary 2008	No
Sprint ach Bill Pay	\$165.04	Amended 8 Day Before Primary 2008	No
Sleep Inn	\$687.20	Amended 8 Day Before Primary 2008	No
Demetria White	\$100.00	Amended 8 Day Before Primary 2008	No
Dorraine Harrington	\$100.00	Amended 8 Day Before Primary 2008	No
Althea Smith	\$100.00	Amended 8 Day Before Primary 2008	No
Glen Fortenberry	\$100.00	Amended 8 Day Before Primary 2008	No
Arvell Gray	\$100.00	Amended 8 Day Before Primary 2008	No
Reginald Gray	\$100.00	Amended 8 Day Before Primary 2008	No
Tory Mitchell	\$100.00	Amended 8 Day Before Primary 2008	No
Jonathan Miller	\$100.00	Amended 8 Day Before Primary 2008	No
Charles Brown	\$100.00	Amended 8 Day Before Primary 2008	No
Jose Nunez	\$100.00	Amended 8 Day Before Primary 2008	No
John Martin	\$100.00	Amended 8 Day Before Primary 2008	No
Karmisha Garner	\$100.00	Amended 8 Day Before Primary 2008	No
Terrell Robinson	\$100.00	Amended 8 Day Before Primary 2008	No
Gwendolyn Branscome	\$100.00	Amended 8 Day Before Primary 2008	No
Lavona Fuller	\$100.00	Amended 8 Day Before Primary 2008	No
Laccie Coffey	\$100.00	Amended 8 Day Before Primary 2008	No
Jerry Cannon	\$100.00	Amended 8 Day Before Primary 2008	No
Carla Henderson	\$100.00	Amended 8 Day Before Primary 2008	No
Tajuana Turner	\$100.00	Amended 8 Day Before Primary 2008	No
Kevin Russell	\$100.00	Amended 8 Day Before Primary 2008	No
Debbie Tilson	\$100.00	Amended 8 Day Before Primary 2008	No
Demtria Whit	\$100.00	Amended 8 Day Before Primary 2008	No
Cash	\$300.00	Amended 8 Day Before Primary 2008	No
Longridge Trading	\$1,000.00	Amended 30 Day After Primary 2008	No
Committee to Elect Jeff Hardin	\$175.00	Amended 30 Day After Primary 2008	No
19th Ward Reg. Democratic	\$150.00	Amended 30 Day After Primary 2008	No
Original 27th Ward Org	\$300.00	Amended 30 Day After Primary 2008	No

Reported expenditures lacking address and/or purpose information			
Payee	Amount	Reported	Address
Sleep Inn	\$530.02	Amended 30 Day After Primary 2008	No
Sleep Inn	\$570.96	Amended 30 Day After Primary 2008	No
AT&T	\$543.93	Amended October 2008 quarterly	No
AT&T	\$424.13	Amended October 2008 quarterly	No
4th Ward Reg. Dems	\$300.00	Amended October 2008 quarterly	No
AT&T	\$388.56	Amended October 2008 quarterly	No
AT&T	\$123.69	Amended October 2008 quarterly	No
Cash	\$125.00	Amended October 2008 quarterly	No
Cash	\$125.00		
Citizens for Mike McMillan	\$200.00	Amended October 2008 quarterly	No
Randy Echols	\$425.00	Amended October 2008 quarterly	No
Willie Brown	\$225.00	Amended 8 Day Before General 2008	No
St Louis City Labor Club	\$200.00	Amended 8 Day Before General 2008	No
Sprint ach Bill Pay	\$185.00	Amended 8 Day Before General 2008	No
Baker for Congress	\$750.00	Amended 8 Day Before General 2008	No
Missouri House Democratic Campaign Committee	\$750.00	Amended 8 Day Before General 2008	No
AT&T	\$376.56	Amended 30 Day After General 2008	No
AT&T	\$446.66	Amended 30 Day After General 2008	No
CBTU - Coalition of Black Trade University	\$560.00	Amended 30 Day After General 2008	No
MO/KS PW	\$250.00	Amended 30 Day After General 2008	No
AT&T	\$641.04	Amended 30 Day After General 2008	No
Cara Clark	\$75.00	Amended 30 Day After General 2008	No
Ingrid Owens	\$1,376.11	Amended 30 Day After General 2008	No
Judy Martin	\$75.00	Amended 30 Day After General 2008	No
Sprint ach Bill Pay	\$140.00	Amended 30 Day After General 2008	No
Carmen and Associates	\$348.00	Amended 30 Day After General 2008	No
Joes Lion Service	\$14.95	Amended 30 Day After General 2008	No
Caring for Kids	\$90.00	Amended 30 Day After General 2008	No
Better Family Life	\$85.00	Amended 30 Day After General 2008	No
Citizens for Ortman	\$100.00	Amended January 2009 quarterly	No
AT&T	\$424.96	Amended January 2009 quarterly	No
Sprint ach Bill Pay	\$143.46	Amended January 2009 quarterly	No
Coldwater Creek	\$110.78	Amended January 2009 quarterly	No
Imprint	\$227.75	Amended January 2009 quarterly	No

Reported expenditures lacking address and/or purpose information			
Payee	Amount	Reported	Address
Sprint ach Bill Pay	\$149.00	Amended April 2009 quarterly	No
27th Ward Democratic Organization	\$65.00	Amended April 2009 quarterly	No
Holiday Inn	\$211.44	Amended April 2009 quarterly	No
Sprint ach Bill Pay	\$175.00	Amended April 2009 quarterly	No
PWW	\$350.00	Amended July 2009 quarterly	No
Hobby Lobby	\$101.12	Amended July 2009 quarterly	No
Sprint ach Bill Pay	\$169.90	Amended July 2009 quarterly	No
Credit Protection	\$293.55	Amended July 2009 quarterly	No
Joes Lion Service	\$19.95	Amended July 2009 quarterly	No
BJ Foundation	\$1,000.00	Amended July 2009 quarterly	No
Sprint ach Bill Pay	\$250.00	Amended July 2009 quarterly	No
Pat Allen	\$270.11	Amended July 2009 quarterly	No
Sprint ach Bill Pay	\$115.00	Amended July 2009 quarterly	No
Sprint ach Bill Pay	\$279.03	Amended July 2009 quarterly	No
Cash	\$250.00	Amended July 2009 quarterly	No
Ronnie Richardson & Assocs.	\$1,500.00	Amended October 2009 quarterly	No
AT&T	\$317.61	Amended October 2009 quarterly	No
ATM	\$202.95	Amended October 2009 quarterly	No
ATM	\$150.00	Amended October 2009 quarterly	No
Marriott Hotels	\$789.18	Amended October 2009 quarterly	No
AT&T	\$429.35	Amended October 2009 quarterly	No
Missouri Democratic Party	\$200.00	Amended October 2009 quarterly	No
Ronnie Richardson & Assocs.	\$1,500.00	Amended October 2009 quarterly	No
AT&T	\$399.32	Amended October 2009 quarterly	No
Sprint ach Bill Pay	\$366.12	Amended October 2009 quarterly	No
DaVita Hanson	\$3,650.00	Amended October 2009 quarterly	No
John Bowman	\$1,977.00	Amended October 2009 quarterly	No
AT&T Cons Phone	\$147.64	Amended October 2009 quarterly	No
AT&T Cons Phone	\$449.20	Amended October 2009 quarterly	No
Ronnie Richardson & Assocs.	\$1,500.00	Amended October 2009 quarterly	No
Sprint Wireless	\$177.87	Amended January 2010 quarterly	No
WSJ.com or Barrons.com	\$129.00	Amended January 2010 quarterly	No
Sprint ach Bill Pay	\$390.60	Amended January 2010 quarterly	No
Ronnie Richardson & Assocs.	\$1,000.00	Amended January 2010 quarterly	No

Reported expenditures lacking address and/or purpose information			
Payee	Amount	Reported	Address
Ronnie Richardson & Assocs.	\$1,500.00	Amended January 2010 quarterly	No
Sprint ach Bill Pay	\$232.84	Amended January 2010 quarterly	No
Sprint ach Bill Pay	\$211.49	Amended January 2010 quarterly	No
Ronnie Richardson & Assocs.	\$1,500.00	Amended January 2010 quarterly	No
Journal Entry	\$120.00	Amended April 2010 quarterly	No
Sprint ach Bill Pay	\$199.27	Amended April 2010 quarterly	No
Sprint ach Bill Pay	\$160.00	Amended April 2010 quarterly	No
Sprint PCS	\$205.00	Amended April 2010 quarterly	No
Sprint ach Bill Pay	\$393.61	Amended July 2010 quarterly	No
Total	\$45,558.30		

32. The following \$14,826.96 in expenditures of \$100 or less should have been reported in single categories, but were reported instead by multiple categories, as follows:

Multiple categories improperly reported in aggregate		
Reported as Multiple Categories:	Amount	Report
Campaign Gas/Food/Parking/Incidentals	\$617.02	Amended July 2008 Quarterly
Campaign Gas/Food/Parking/Incidentals	\$100.00	Amended 8 Days Before Primary 2008
Campaign Gas/Food/Parking/Incidentals	\$736.55	Amended 30 Day After Primary 2008
Campaign Gas/Food/Parking/Incidentals	\$287.63	Amended October 2008 quarterly
Campaign Gas/Food/Parking/Incidentals	\$600.96	Amended 8 Days Before General 2008
Campaign Gas/Food/Parking/Incidentals	\$686.45	Amended 30 Days After General 2008
Campaign Gas/Food/Parking/Incidentals	\$537.43	Amended January Quarterly 2009
Campaign Gas/Food/Parking/Incidentals	\$894.10	Amended April Quarterly 2009
Campaign Gas/Food/Parking/Incidentals	\$1,542.16	Amended July Quarterly 2009
Campaign Gas/Food/Parking/Incidentals	\$1,744.05	Amended October Quarterly 2009
Campaign	\$1,909.99	Amended January Quarterly 2010

Multiple categories improperly reported in aggregate		
Reported as Multiple Categories:	Amount	Report
Gas/Food/Parking/Incidentals		
Campaign Gas/Food/Parking/Incidentals	\$943.14	Amended April Quarterly 2010
Campaign Gas/Food/Parking/Incidentals	\$810.89	Amended July Quarterly 2010
Campaign Gas/Food/Parking/Incidentals	\$1,912.19	Amended April Quarterly 2011
Campaign Gas/Food/Parking/Incidentals	\$520.89	Amended July Quarterly 2011
Campaign Gas/Food/Parking/Incidentals	\$983.51	Amended October Quarterly 2011
Total	\$14,826.96	

33. Respondents incorrectly reported an expenditure of \$549 to Amtrak as an expenditure of \$132.09 to Amtrak, and incorrectly reported an expenditure of \$132.09 to Hilton Hotels as an expenditure of \$549 to Hilton Hotels;

34. Respondents incorrectly reported two expenditures, for \$424.96 and \$80.06, as a single expenditure of \$505.02 to AT&T;

35. Respondents incorrectly reported an expenditure of \$243.46 to Sprint as an expenditure of \$143.43 to Sprint;

36. Respondents incorrectly reported a \$1,000 expenditure to CSI Telecommunications as a \$1,000 expenditure to John Bowman;

37. Respondents incorrectly reported a \$3,650 expenditure to DaVita Hanson as a \$3,650 expenditure to Michael Tarrell;

38. Respondents incorrectly reported a \$400 expenditure to Jasance Razland as a \$400 expenditure to John Bowman;

39. Respondents incorrectly reported a \$1,977 expenditure to John Bowman as a \$1,977 expenditure to Michael Tarrell;

40. Respondents incorrectly reported a \$120 expenditure to Ingrid Owens as a \$120 expenditure to Michael Tarrell;

41. Respondents incorrectly reported a \$445 expenditure to Colonial West Apartments as an expenditure of \$445 to Robin Wright-Jones.

COUNT V

Cash expenditures in excess of allowed limits

42. Respondents made thirty-six cash expenditures, each in excess of \$50, and totaling \$14,414:

Description	Date	Amount
Cash Disbursed	7/24/2008	\$1,800.00
Cash Disbursed	7/26/2008	\$400.00
Cash	6/12/2008	\$120.00
Cash	6/23/2008	\$1,770.00
Cash	7/3/2008	\$120.00
Cash	7/15/2008	\$100.00
Cash	7/21/2008	\$200.00
Cash	7/30/2008	\$200.00
Cash	8/2/2008	\$350.00
Cash	8/4/2008	\$750.00
Cash	8/5/2008	\$1,800.00
Cash	8/16/2008	\$200.00
Cash	8/22/2008	\$600.00
Cash	9/25/2008	\$250.00
Cash	10/22/2008	\$100.00
Cash	11/5/2008	\$50.00
Cash	1/5/2009	\$1,410.00
Cash	2/27/2009	\$50.00
Cash	5/20/2009	\$100.00
Cash	6/16/2009	\$100.00
Cash	6/25/2009	\$250.00
Cash	9/10/2009	\$150.00
Cash	1/11/2010	\$120.00
Cash	4/8/2011	\$1,994.44
ATM Cash	3/26/2009	\$31.00

ATM Cash	6/6/2009	\$103.00
ATM Cash	6/21/2009	\$103.00
ATM Cash	7/10/2009	\$203.95
ATM Cash	7/12/2009	\$63.95
ATM Cash	12/9/2009	\$44.25
ATM Cash	12/15/2009	\$21.00
ATM Cash	12/21/2009	\$44.00
ATM Cash	5/22/2010	\$44.00
ATM Cash	11/11/2010	\$204.00
ATM Cash	12/5/2010	\$364.00
ATM Cash	12/13/2010	\$204.00
	TOTAL	\$14,414.59

COUNT VI

Improperly reporting "consulting services"

43. For \$44,295.13 in expenditures, Respondents reported purposes such as "campaign professional services" and "campaign activity," and/or failed to file an independent contractor form, as follows:

Improper independent contractor reporting				
Expenditure	Date	Reported Purpose	Amount	Report
DaVita Hanson PO Box 52177 St Louis, MO 63136	7/17/2008	Campaign Professional Services PR	\$500.00	Amended 8 day before primary 2008
Ingrid Owens	7/25/2008	Campaign Professional Services	\$1,118.65	Amended 30 Day After Primary 2008
DaVita Hanson PO Box 52177 St Louis, MO 63136	8/4/2008	Campaign Professional Services	\$1,000.00	Amended 30 Day After Primary 2008
DaVita Hanson PO Box 52177 St Louis, MO 63136	8/22/2008	Campaign Professional Services	\$600.00	Amended 30 Day After Primary 2008
DaVita Hanson PO Box 52177 St Louis, MO 63136	9/9/2008	Campaign Professional Services	\$300.00	Amended October 2008 quarterly

Improper independent contractor reporting				
Expenditure	Date	Reported Purpose	Amount	Report
John Bowman 4201 Minoma St Louis, MO 63121	9/15/2008	Campaign Professional Services	\$700.00	Amended October 2008 quarterly
DaVita Hanson PO Box 52177 St Louis, MO 63136	9/19/2008	Campaign Professional Services	\$750.00	Amended October 2008 quarterly
Debra Shurn Marketing Works 707 North Second Street St Louis, MO 63102	9/22/2008	Campaign Professional Services	\$500.00	Amended October 2008 quarterly
John Bowman 4201 Minoma St Louis, MO 63121	9/30/2008	Campaign Professional Services	\$1,300.00	Amended October 2008 quarterly
DaVita Hanson PO Box 52177 St Louis, MO 63136	10/10/2008	Campaign Professional Services	\$750.00	Amended 8 Day Before General 2008
Steve Chalmers 30509 Louisiana St Louis, MO 63110	10/10/2008	Campaign Professional Services	\$1,000.00	Amended 8 Day Before General 2008
DaVita Hanson Marketing Works PO Box 52177 St Louis, MO 63136	10/15/2008	Campaign Professional Services	\$1,000.00	Amended 8 Day Before General 2008
John Bowman 4201 Minoma St Louis, MO 63121	10/20/2008	Campaign Professional Services	\$2,500.00	Amended 8 Day Before General 2008
DaVita Hanson PO Box 52177 St Louis, MO 63136	10/24/2008	Campaign Professional Service	\$750.00	Amended 30 Day After General 2008
Gateway Alarm Inc 5923 Weber Road St Louis, MO 63123	10/24/2008	Campaign Professional Services	\$300.00	Amended 30 Day After General 2008
Cheryl Dozier 911 Lafayette Jefferson City, MO 65102	10/28/2008	Campaign Professional Services	\$180.59	Amended 30 Day After General 2008
John Bowman 4201 Minoma St Louis, MO 63121	10/28/2008	Campaign Professional Services	\$5,000.00	Amended 30 Day After General 2008
Ingrid Owens	11/10/2008	Campaign Professional Services	\$1,376.11	Amended 30 Day After General 2008

Improper independent contractor reporting				
Expenditure	Date	Reported Purpose	Amount	Report
DaVita Hanson PO Box 52177 St Louis, MO 63136	11/18/2008	Campaign Professional Services	\$500.00	Amended 30 Day After General 2008
Carmen & Associates	11/20/2008	Campaign Professional Services	\$348.00	Amended 30 Day After General 2008
DaVita Hanson PO Box 52177 St Louis, MO 63136	11/20/2008	Campaign Professional Services	\$500.00	Amended 30 Day After General 2008
DaVita Hanson PO Box 52177 St Louis, MO 63136	11/25/2008	Campaign Professional Services	\$500.00	Amended 30 Day After General 2008
John Bowman 4201 Minoma St Louis, MO 63121	11/28/2008	Campaign Professional Services	\$2,500.00	Amended 30 Day After General 2008
John Bowman 4201 Minoma St Louis, MO 63121	12/3/2008	Campaign Professional Services	\$1,000.00	Amended January 2009 quarterly
Cheryl Dozier & Assoc. 911 Lafayette Jefferson City, MO 65102	12/8/2008	Campaign Professional Services	\$500.00	Amended January 2009 quarterly
DaVita Hanson PO Box 52177 St Louis, MO 63136	12/24/2008	Campaign Professional Services	\$250.00	Amended January 2009 quarterly
DaVita Hanson PO Box 52177 St Louis, MO 63136	3/2/2009	Campaign Professional Services	\$250.00	Amended April 2009 quarterly
DaVita Hanson PO Box 52177 St Louis, MO 63136	3/23/2009	Campaign Professional Services	\$250.00	Amended April 2009 quarterly
Political Resources & Solutions, LLC PO Box 771731 St Louis, MO 63117	4/15/2009	Campaign Professional Service	\$200.00	Amended July 2009 quarterly
DaVita Hanson PO Box 52177 St Louis, MO 63136	5/11/2009	Campaign Professional Services	\$350.00	Amended July 2009 quarterly
Ronnie Richardson Assoc. Jefferson City, MO	6/1/2009	Campaign Professional Services	\$1,500.00	Amended July 2009 quarterly

Improper independent contractor reporting				
Expenditure	Date	Reported Purpose	Amount	Report
Maida Coleman 1800 Dolman St Louis, MO 63104	6/9/2009	Campaign Professional Services	\$250.00	Amended July 2009 quarterly
Maida Coleman 1800 Dolman St Louis, MO 63104	6/22/2009	Campaign Professional Service	\$250.00	Amended July 2009 quarterly
DaVita Hanson PO Box 52177 St Louis, MO 63136	7/1/2009	Campaign Professional Services	\$1,500.00	Amended October 2009 quarterly
Ronnie Richardson Assoc. Jefferson City, MO	7/2/2009	Campaign Professional Services	\$1,500.00	Amended October 2009 quarterly
Cheryl Dozer & Associates 911 Lafayette Jefferson City, MO 65102	7/20/2009	Campaign Professional Services	\$200.00	Amended October 2009 quarterly
DaVita Hanson PO Box 52177 St Louis, MO 63136	8/4/2009	Campaign Professional Services	\$1,500.00	Amended October 2009 quarterly
Ronnie Richardson Assoc. Jefferson City, MO	8/5/2009	Campaign Professional Services	\$1,500.00	Amended October 2009 quarterly
John Bowman 4201 Minoma St Louis, MO 63121	8/10/2009	Campaign Professional Services	\$1,000.00	Amended October 2009 quarterly
Jasonee Ragland 1375 North Highway Drive Fenton, MO 63026	8/25/2009	Campaign Professional Services	\$125.00	Amended October 2009 quarterly
John Bowman 4201 Minoma St Louis, MO 63121	9/4/2009	Campaign Professional Services	\$400.00	Amended October 2009 quarterly
Cheryl Dozer & Associates 911 Lafayette Jefferson City, MO 65102	9/17/2009	Campaign Professional Fees	\$200.00	Amended October 2009 quarterly
Cheryl Dozer & Associates 911 Lafayette Jefferson City, MO 65102	9/21/2009	Campaign Professional Services	\$200.00	Amended October 2009 quarterly

Improper independent contractor reporting				
Expenditure	Date	Reported Purpose	Amount	Report
Jasonee Ragland 1375 North Highway Drive Fenton, MO 63026	9/22/2009	Campaign Professional Services	\$746.78	Amended October 2009 quarterly
Ronnie Richardson Assoc. Jefferson City, MO	9/24/2009	Campaign Professional Services	\$1,500.00	Amended October 2009 quarterly
Ronnie Richardson Assoc. Jefferson City, MO	10/29/2009	Campaign Professional Service	\$1,000.00	Amended January 2010 quarterly
Ronnie Richardson Assoc. Jefferson City, MO	11/17/2009	Campaign Professional Service	\$1,500.00	Amended January 2010 quarterly
Cheryl Dozer & Assoc. 911 Lafayette Jefferson City, MO 65102	12/7/2009	Campaign Professional Service	\$400.00	Amended January 2010 quarterly
Ronnie Richardson Assoc. Jefferson City, MO	12/24/2009	Campaign Professional Service	\$1,500.00	Amended January 2010 quarterly
Cheryl Dozer & Associates 911 Lafayette Jefferson City, MO 65102	1/29/2010	Campaign Professional Services	\$400.00	Amended April 2010 quarterly
Phillip Berry 4122 San Francisco St Louis, MO 63115	2/1/2010	Campaign Activity	\$350.00	Amended April 2010 quarterly
		TOTAL	\$44,295.13	

COUNT VII

Conversion of contributions to personal use

44. Respondent Wright-Jones converted \$14,169.00 in committee funds into personal use. For example, Respondent Wright-Jones made the following purchases from her candidate committee's bank account:¹

Category	Payee	Sum of Amount
Bookstore	Barnes and Noble	\$210.60
	Borders Books	\$214.60
	WSJ.com or Barrons.com	\$373.00
Car Repair	McMahon Pontiac	\$89.66
	Valvoline Instant	\$92.51
Cleaners	Marquards Cleaners	\$84.30
Clothing, Shoes, Accessories	ABC Trading Wholesale	\$231.43
	Chico's	\$114.65
	Clayton Specialist Dr	\$25.00
	Coldwater Creek	\$110.78
	Dillards	\$703.02
	Distinctions	\$1,789.33
	Forever 21	\$28.98
	JC Penny Store	\$60.35
	Lane Bryant	\$61.22
	Marmi #1	\$417.50
	Naturalizer Shoe Store	\$80.87
	Payless Shoesource	\$33.77
	Sears	\$39.68
	SK Jewelers	\$102.19
	Sunglass Hut	\$141.09
Torrid	\$30.19	

¹ A more detailed list of personal expenditures made from Respondents' official depository account, arranged by category, payee, and transaction date, is available at Appendix A.

Clothing, Shoes, Accessories	Vincent's Jeweler	\$20.59
Food - Catering	Collective Catering	\$266.66
Food - Grocery	Crown Food Mart	\$686.53
	Pick A Dilly	\$180.68
	Schnucks Market	\$2,624.99
	Shop 'N Save	\$183.27
	Whole Foods Market	\$672.75
Food - Restaurant	Alex's Rest & Lounge	\$115.00
	Applebees	\$176.13
	Arby's	\$26.63
	Burger Bar	\$52.00
	Burger King	\$5.95
	Captain D's	\$71.62
	Chateau on the Lake	\$8.00
	Chili's	\$83.00
	Five Guys	\$20.44
	Five Star Senior Center	\$30.00
	Fox Club	\$127.13
	Gordon Biersch-Kansas	\$110.00
	Grill on the Alley	\$16.00
	Hibachi	\$18.11
	Home Town Buffet	\$152.76
	Hooters	\$91.59
	House Inner Circle	\$20.00
	Johnny's Barbeque	\$46.00
	Lees Chicken	\$25.12
	Longhorn's	\$120.00
	Lubeleys Bakery	\$77.87
	McCormick & Schmickus	\$18.00
	McDonald's	\$70.67
	O'Charleys	\$33.39
	Oscars Café	\$81.92
	Panera Bread	\$79.18
	Pappa Deaux Seafood Kitchen	\$45.00
	Pappy's Smokehouse	\$26.47
	Penn Station Hamptons	\$22.90
	Rally's Hamburgers	\$32.22
	Red Lobster	\$434.56
	Rosco's Family	\$27.38
Ruby Tuesday	\$48.44	

Food - Restaurant	Sashas on Shaw LLC	\$30.00
	Smitys	\$350.02
	St Louis Bread	\$20.33
	Sweetie Pies	\$24.14
	The Best Steak House	\$67.36
	The Fountain	\$45.00
	The Peach Tree	\$45.10
	The U	\$29.14
	Triumph Grill	\$58.44
	Vitos Restaurant	\$90.77
	White Castle	\$155.99
Medical	Medical West Health	\$45.17
QVC	QVC	\$525.42
Subscriptions	Angies List	\$116.00
Tickets	Park Tickets 444	\$120.00
	Scot Trade Tickets	\$362.50
Video Games	Gamestop	\$100.00
	TOTAL	\$14,169.05

45. When asked under oath about the purchases made by the Committee, specifically Distinctions and QVC, Respondent Wright-Jones asserted her Fifth Amendment right to not testify against herself.

COUNT VIII

Committee funds not used for any purpose allowed by law

46. Between January 2009 and at least January 2012, Respondent Wright-Jones expended at least \$3,789.00 in committee funds for mileage.

47. However, during that same time period, Respondent Wright-Jones was personally reimbursed by the Missouri Senate for that same mileage.

48. In sum, Respondent Wright-Jones was personally reimbursed by the State for mileage expenses that she did not actually incur. Consequently, Respondent Wright-Jones made

expenditures from her candidate committee account that were neither “ordinary” nor “necessary” in connection with her duties as a holder of elective office.

49. When asked under oath about Senate travel allowances and reimbursements she received, Respondent Wright-Jones asserted her Fifth Amendment right to not testify against herself.

50. Respondent Wright-Jones received \$2,299.05 in mileage allowances from the State of Missouri pursuant to Section 21.140, RSMo (“Senators ... shall receive, weekly, a mileage allowance as provided by law for state employees, in going to their place of meeting in Jefferson City from their place of residence, and returning from their place of meeting in Jefferson City to their place of residence while the legislature is in session....”), while the Senate was in session.

51. Respondent Wright-Jones also received \$3,655.91 in mileage reimbursements from the State of Missouri for official travel when the Missouri Senate was not in session. On the reimbursement form, Respondent Wright-Jones signed a statement that “I hereby certify that the above claim is correct, that these expenses were necessary to conduct state business, *that payment has been made from personal funds for which I have not been reimbursed, nor will I receive from any source any payment for these expenses.*” (Emphasis added).

52. One example of Respondent Wright-Jones making an expenditure from her campaign account but obtaining personal reimbursement from the state for the same mileage occurred the week of January 26, 2009. That week, Respondent Wright-Jones was paid an allowance of \$128.25 for her attendance in the Senate from Monday, January 26 through Thursday, January 29. However, Respondent Wright-Jones’ campaign account shows an expenditure of \$26.00 at a QT station in St. Peters, Missouri, on Monday, January 26, and an

expenditure of \$19.93 at an ExxonMobil station in Kingdom City on Saturday, January 31, 2009. Respondent did not then reimburse her committee.

53. Because Respondent Wright-Jones was reimbursed personally, and her committee was not reimbursed, for these expenditures, it was not “ordinary and necessary” to use committee funds on Respondent Wright-Jones’s mileage, even if they were in connection with her duties as a holder of elective office.

CONCLUSIONS OF LAW

COUNT I

Failure to timely amend statement of committee organization

54. Each candidate committee must have a single official fund depository within the state, and must maintain an official depository account there in the committee’s own name.

§ 130.021.4, RSMo.

55. The candidate committee must disclose the name and mailing address of its depository, and the account number for each account maintained by the committee in the depository. § 130.021.5(6), RSMo.

56. Any changes to the committee’s account information must be filed within twenty (20) days of that change. § 130.021.6, RSMo.

57. There is probable cause to believe that Respondents violated Sections 130.021.4, 130.021.5(6), and 130.021.6, RSMo, by failing, within twenty days, to file an amended statement of committee organization disclosing that the first official depository account had been closed and that the second official depository account had been opened, and that Respondents did so knowingly.

COUNT II

Failure to timely file campaign finance disclosure reports and failure to accurately report money on hand

58. Respondents were required to file campaign finance disclosure reports at the following times and for the following periods:

(1) Not later than the eighth day before an election for the period closing on the twelfth day before the election if the committee has made any contribution or expenditure either in support or opposition to any candidate or ballot measure;

(2) Not later than the thirtieth day after an election for a period closing on the twenty-fifth day after the election, if the committee has made any contribution or expenditure either in support of or opposition to any candidate or ballot measure; except that, a successful candidate who takes office prior to the twenty-fifth day after the election shall have complied with the report requirement of this subdivision if a disclosure report is filed by such candidate and any candidate committee under the candidate's control before such candidate takes office, and such report shall be for the period closing on the day before taking office; and

(3) Not later than the fifteenth day following the close of each calendar quarter.

...

§ 130.046.1, RSMo.

59. Respondents were required to disclose the amount of cash on hand as of the beginning of the reporting period and the closing date of the reporting period. § 130.041.1(2); § 130.041.1(5), RSMo.

60. There is probable cause to believe that Respondents violated Sections 130.046.1 and 130.041.1, RSMo, by failing to file one report, failing to timely file eleven reports, incorrectly reporting money on hand on two reports, improperly excluding several days' worth of activity from two reporting periods, and that Respondents did so knowingly.

COUNT III

Failure to timely and accurately report contributions received

61. Respondents were required to file campaign finance disclosure reports that set forth receipts for the period, including the:

(a) Total amount of all monetary contributions received which can be identified in the committee's records by name and address of each contributor. In addition, the candidate committee shall make a reasonable effort to obtain and report the employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received one or more contributions which in the aggregate total in excess of one hundred dollars and shall make a reasonable effort to obtain and report a description of any contractual relationship over five hundred dollars between the contributor and the state if the candidate is seeking election to a state office or between the contributor and any political

subdivision of the state if the candidate is seeking election to another political subdivision of the state;

...

(e) A separate listing by name and address and employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received contributions, in money or any other thing of value, aggregating more than one hundred dollars, together with the date and amount of each such contribution;

...

§ 130.041.1(3), RSMo.

62. There is probable cause to believe that Respondents violated Section 130.041.1(3), RSMo, by failing to disclose \$71,492.00 in contributions, reporting \$3,475 in contributions that were not deposited into the official depository account, inaccurately reporting the aggregate amount of contributions, inaccurately reporting contributions over \$100, and failing to include the employer and/or address of the contributor for 92 contributions that total \$53,225, and that Respondents did so knowingly.

COUNT IV

Failure to timely and accurately report expenditures and contributions made and cash expenditures in excess of allowed limits

63. Respondents were required to file campaign finance disclosure reports that set forth expenditures for the period, including the:

(a) The total dollar amount of expenditures made by check drawn on the committee's depository;

(b) The total dollar amount of expenditures made in cash;

...

(d) The full name and mailing address of each person to whom an expenditure of money or any other thing of value in the amount of more than one hundred dollars has been made, contracted for or incurred, together with the date, amount and purpose of each expenditure. Expenditures of one hundred dollars or less may be grouped and listed by categories of expenditure showing the total dollar amount of expenditures in each category, except that the report shall contain an itemized listing of each payment made to campaign workers by name, address, date, amount and purpose of each payment and the aggregate amount paid to each such worker;

...

§ 130.041.1(4), RSMo.

64. There is probable cause to believe that Respondents violated Section 130.041.1(4), RSMo, by failing to report \$148,833 in expenditures, improperly reporting \$2,695 in expenditures greater than \$100 each by failing to itemize them, inaccurately reported the aggregate of expenditures of \$100 or less by category, failing to include the address for 129 expenditures totaling \$45,558, improperly reporting \$14,826 in expenditures of \$100 or less by multiple categories, rather than single categories, and otherwise incorrectly reporting expenditures, and that Respondents did so knowingly.

COUNT V

Cash expenditures in excess of allowed limits

65. “Except for expenditures from a petty cash fund which is established and maintained by withdrawals from the committee’s depository account and with records maintained pursuant to the recordkeeping requirements of section 130.036 to account for expenditures made from petty cash, each expenditure of more than fifty dollars, except an in-kind expenditure, shall be made by check drawn on the committee’s depository and signed by the committee treasurer, deputy treasurer or candidate. A single expenditure from a petty cash fund shall not exceed fifty dollars, and the aggregate of all expenditures from a petty cash fund during a calendar year shall not exceed the lesser of five thousand dollars or ten percent of all expenditures made by the committee during that calendar year. A check made payable to ‘cash’ shall not be made except to replenish a petty cash fund.” § 130.031.2, RSMo.

66. There is probable cause to believe that Respondents violated Section 130.031.2, RSMo, by making thirty-six cash expenditures, each in excess of \$50, and totaling \$14,414, and that Respondents did so knowingly.

COUNT VI

Improperly reporting “consulting services”

67. “The words ‘consulting or consulting services, fees, or expenses,’ or similar words, shall not be used to describe the purpose of a payment as required in this section. The reporting of any payment to such an independent contractor shall be on a form supplied by the appropriate officer, established by the ethics commission and shall include identification of the specific service or services provided including, but not limited to, public opinion polling, research on issues or opposition background, print or broadcast media production, print or

broadcast media purchase, computer programming or data entry, direct mail production, postage, rent, utilities, phone solicitation, or fund raising, and the dollar amount prorated for each service.” § 130.041.4, RSMo.

68. There is probable cause to believe that Respondents violated Section 130.041.4, RSMo, by reporting on eleven (11) reports the purpose of 101 expenditures, totaling \$44,295, as either “campaign professional services” and “campaign activity,” and/or failed to file an independent contractor form for these expenditures, and that Respondents did so knowingly.

COUNT VII

Conversion of contributions to personal use

69. Contributions shall not be converted to any personal use. § 130.034.1, RSMo.

70. In civil administrative actions, a Respondent’s refusal to answer pertinent questions on Fifth Amendment grounds justifies an inference that “if she had answered truthfully, the answers would have been unfavorable to her ... or [] would have corroborated testimony given by the opposing side’s witnesses on the subject matter of the questions.” *Johnson v. Missouri Bd. of Nursing Administrators*, 130 S.W.3d 619, 630-31 (Mo. App. W.D. 2004) (internal citations omitted). Here, the Missouri Ethics Commission draws the inference that had Respondent Wright-Jones answered truthfully regarding the purchases by the Committee, the answers would have been unfavorable and would have corroborated the evidence of personal use found in the Commission’s Exhibits 5, 6, 17, 18, 19, and 20.

71. There is probable cause to believe that Respondent Wright-Jones violated Section 130.034.1, RSMo, by converting \$14,069 in committee funds into personal use, and that Respondent Wright-Jones did so knowingly.

COUNT VIII

Committee funds not used for any purpose allowed by law

72. Committee funds may be used only for purposes allowed by law, and expenses incurred in connection with the duties of a holder of elective office must be “ordinary and necessary.” § 130.034.2(2), RSMo.

73. In civil administrative actions, a Respondent’s refusal to answer pertinent questions on Fifth Amendment grounds justifies an inference that “if she had answered truthfully, the answers would have been unfavorable to her ... or [] would have corroborated testimony given by the opposing side’s witnesses on the subject matter of the questions.” *Johnson v. Missouri Bd. of Nursing Administrators*, 130 S.W.3d 619, 630-31 (Mo. App. W.D. 2004) (internal citations omitted). Here, the Missouri Ethics Commission draws the inference that had Respondent Wright-Jones answered truthfully regarding the Senate mileage allowances and reimbursements, the answers would have been unfavorable and would have corroborated the evidence of impermissible use found in the Commission’s Exhibits 5, 6, 14, 15, 17, 18, 19, and 20.

74. There is probable cause to believe that Respondent Wright-Jones violated Section 130.034, RSMo, by making \$3,789 in expenditures that were not “ordinary and necessary” expenses incurred in connection with her duties as a holder of elective office, because Respondent Wright-Jones was reimbursed personally for those expenses, and that Respondent Wright-Jones did so knowingly.

ORDER

The Missouri Ethics Commission finds probable cause that Respondents Wright-Jones and Wright-Jones for Missouri violated, and have knowingly violated, Sections 130.021.4, 130.021.5(6), 130.021.6, 130.046.1, 130.041.1, 130.041.1(3), 130.041.1(4), 130.031.2, 130.041.4, 130.034.1, and 130.034.2(2), RSMo.

In regards to Counts 1, 2, 3, 4, and 6, the Missouri Ethics Commission orders a fee be imposed against Respondents Wright-Jones and Wright-Jones for Missouri in the amount of \$239,308 pursuant to Section 105.961.4(6), RSMo. The Commission's determination of fees for Count IV was by a vote of 5-1.

If Respondents pay \$23,930 of the fee imposed in regards to Counts 1, 2, 3, 4, and 6 within 90 days of the date of this Order and files all required campaign finance disclosure reports, the remainder of the fee in regard to Counts 1, 2, 3, 4, and 6 will be stayed, subject to the provisions below.

If either Respondent Wright-Jones or Respondent Wright-Jones for Missouri commits any further violations of the campaign finance disclosure laws under Chapter 130, RSMo, as amended, within the two year period from the date of this order, then Respondents will be required to pay the balance of the fee as originally imposed by the Commission in regards to Counts 1, 2, 3, 4 and 6. The amount of the balance will be due immediately upon final adjudication finding probable cause of such a violation. Respondents Wright-Jones and Wright-Jones for Missouri shall be jointly and severally liable for the balance.

In regards to Count 5, the Missouri Ethics Commission orders a fee be imposed against Respondents Wright-Jones and Wright-Jones for Missouri in the amount of \$14,414.

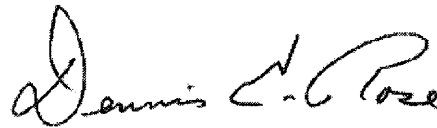
In regards to Count 7, the Missouri Ethics Commission orders a fee be imposed against Respondents Wright-Jones and Wright-Jones for Missouri in the amount of \$14,069.

In regards to Count 8, the Missouri Ethics Commission orders a fee be imposed against Respondents Wright-Jones and Wright-Jones for Missouri in the amount of \$3,789.

The fee imposed in regards to Counts 5, 7 and 8 are ordered to be paid within 90 days of the date of this Order.

The Commission further orders Respondents Wright-Jones and Wright-Jones for Missouri to file accurately all necessary campaign finance reports and statements, including but not limited to a termination report or amended statement of committee organization as a debt service committee, as appropriate.

SO ORDERED this 14th day of May, 2013.



Dennis Rose, Chairman
MISSOURI ETHICS COMMISSION

Appendix A
Personal Use Expenditures

Category	Payee	Date	Amount	
Bookstore	Barnes and Noble	9/13/2008	\$76.29	
		9/28/2008	\$79.54	
		11/24/2008	\$54.77	
	Borders Books	10/26/2009	\$81.52	
		12/23/2009	\$98.39	
		5/3/2010	\$34.69	
	WSJ.com or Barrons.com	10/16/2008	\$89.00	
		10/16/2009	\$129.00	
		10/23/2010	\$155.00	
Car Repair	McMahon Pontiac	8/31/2009	\$89.66	
	Valvoline Instant	3/30/2009	\$92.51	
Cleaners	Marquards Cleaners	11/24/2009	\$84.30	
Clothing, Shoes, Accessories	ABC Trading Wholesale	4/26/2009	\$98.70	
		8/27/2009	\$82.65	
		4/10/2010	\$50.08	
	Chico's	10/24/2009	\$114.65	
	Clayton Specialist Dr	6/22/2010	\$25.00	
	Coldwater Creek	12/26/2008	\$110.78	
	Dillard's	9/12/2009	\$97.04	
		10/10/2009	\$511.09	
		10/21/2009	\$94.89	
	Distinctions	8/13/2009	\$1,664.33	
		9/16/2009	\$125.00	
	Forever 21	8/26/2009	\$28.98	
	JC Penny Store	7/4/2009	\$60.35	
	Lane Bryant	7/4/2009	\$16.31	
		8/28/2009	\$44.91	
	Marmi #1	10/7/2009	\$306.07	
		10/25/2010	\$111.43	
	Naturalizer Shoe Store	10/5/2009	\$80.87	
	Payless Shoesource	6/13/2009	\$33.77	
	Sears	8/26/2009	\$39.68	
	SK Jewelers	11/23/2009	\$102.19	
	Sunglass Hut	7/6/2009	\$141.09	
	Torrid	1/24/2010	\$30.19	
	Vincent's Jeweler	12/30/2009	\$20.59	
	Food - Catering	Collective Catering	11/2/2009	\$266.66

Appendix A
Personal Use Expenditures

Category	Payee	Date	Amount
Food - Grocery	Crown Food Mart	3/22/2010	\$46.66
		3/26/2010	\$50.23
		4/5/2010	\$57.53
		4/19/2010	\$47.94
		4/20/2010	\$40.82
		6/19/2010	\$30.00
		6/21/2010	\$48.64
		8/7/2010	\$30.00
		8/10/2010	\$37.70
		10/26/2010	\$29.24
		11/15/2010	\$54.99
		11/22/2010	\$50.20
		12/16/2010	\$60.22
		12/25/2010	\$56.67
		1/18/2011	\$45.69
	Pick A Dilly	12/8/2008	\$21.10
		3/25/2009	\$39.97
		9/7/2009	\$40.44
		3/4/2010	\$3.43
		3/5/2010	\$35.91
		4/30/2010	\$39.83
	Schnucks Market	10/4/2008	\$370.88
		10/7/2008	\$12.28
		10/16/2008	\$35.01
		10/24/2008	\$36.58
		11/4/2008	\$16.49
		12/21/2008	\$56.72
		12/30/2008	\$37.51
		2/1/2009	\$51.35
		3/2/2009	\$50.32
		3/10/2009	\$11.51
		3/18/2009	\$137.51
		3/22/2009	\$34.83
		4/17/2009	\$38.28
		4/22/2009	\$48.48
		5/21/2009	\$28.44
5/23/2009	\$14.10		

Appendix A
Personal Use Expenditures

Category	Payee	Date	Amount	
Food - Grocery	Schnucks Market	7/3/2009	\$10.73	
		7/5/2009	\$36.22	
		7/6/2009	\$62.48	
		8/28/2009	\$73.68	
		9/6/2009	\$31.76	
		9/10/2009	\$55.54	
		9/14/2009	\$14.87	
		9/17/2009	\$82.91	
		10/10/2009	\$34.79	
		10/21/2009	\$115.64	
		12/22/2009	\$79.95	
		12/23/2009	\$23.46	
		12/31/2009	\$186.41	
		1/6/2010	\$49.71	
		1/9/2010	\$134.74	
		1/21/2010	\$49.32	
		1/24/2010	\$102.69	
		2/5/2010	\$120.49	
		3/2/2010	\$31.46	
		4/9/2010	\$44.00	
		6/20/2010	\$43.18	
		8/9/2010	\$43.92	
		10/26/2010	\$16.48	
	11/22/2010	\$53.07		
	11/23/2010	\$46.61		
	12/4/2010	\$37.11		
	12/24/2010	\$63.48		
		Shop 'N Save	11/3/2008	\$84.16
			7/3/2009	\$99.11
		Whole Foods Market	11/23/2008	\$86.06
			5/23/2009	\$110.40
			9/12/2009	\$30.93
			12/20/2009	\$221.12
	4/10/2010		\$64.66	
	5/27/2010		\$46.12	
	6/20/2010		\$68.13	
		8/3/2010	\$45.33	

Appendix A
Personal Use Expenditures

Category	Payee	Date	Amount
Food - Restaurant	Alex's Rest & Lounge	7/17/2009	\$115.00
	Applebee's	8/25/2008	\$48.57
		10/2/2008	\$77.56
		11/1/2008	\$50.00
	Arby's	6/12/2009	\$26.63
	Burger Bar	8/22/2008	\$52.00
	Burger King	10/25/2010	\$5.95
	Captain Ds	9/19/2009	\$43.85
		7/27/2010	\$9.12
		7/29/2010	\$9.76
		11/2/2010	\$8.89
	Chateau on the Lake	10/6/2009	\$8.00
	Chili's	12/3/2008	\$50.00
		11/7/2009	\$33.00
	Five Guys	7/16/2010	\$20.44
	Five Star Senior Center	7/27/2010	\$30.00
	Fox Club	11/3/2008	\$36.13
		12/13/2008	\$91.00
	Gordon Biersch-Kansas	7/10/2009	\$110.00
	Grill on the Alley	10/27/2009	\$16.00
	Hibachi	12/13/2009	\$18.11
	Home Town Buffet	9/7/2008	\$36.11
		12/4/2008	\$16.98
		3/23/2009	\$25.58
		3/28/2009	\$12.79
		10/13/2009	\$24.56
		12/20/2009	\$36.74
	Hooters	11/23/2008	\$41.59
		8/7/2009	\$50.00
	House Inner Circle	2/23/2010	\$20.00
	Johnny's Barbeque	12/9/2008	\$46.00
	Lees Chicken	4/8/2010	\$9.14
4/13/2010		\$15.98	
Longhorn's	6/2/2009	\$60.00	
	11/18/2010	\$60.00	
Lubeleys Bakery	8/31/2009	\$77.87	
McCormick & Schmickus	10/26/2009	\$18.00	

Appendix A
Personal Use Expenditures

Category	Payee	Date	Amount
Food - Restaurant	McDonald's	10/15/2008	\$9.27
		9/19/2009	\$21.18
		12/17/2009	\$12.28
		5/23/2010	\$2.48
		7/29/2010	\$11.18
		10/6/2010	\$14.28
	O'Charleys	12/12/2008	\$33.39
	Oscars Café	10/30/2008	\$51.92
		12/30/2009	\$30.00
	Panera Bread	10/9/2008	\$8.22
		10/11/2008	\$48.32
		12/22/2009	\$22.64
	Pappa Deaux Seafood Kitchen	8/28/2008	\$45.00
	Pappy's Smokehouse	8/14/2008	\$26.47
	Penn Station Hampton	7/25/2010	\$22.90
	Rally's Hamburgers	10/8/2008	\$12.24
		10/23/2008	\$11.88
		11/21/2008	\$8.10
	Red Lobster	3/23/2009	\$85.65
		8/2/2009	\$70.00
		9/5/2009	\$47.88
		11/12/2009	\$116.03
		7/22/2010	\$55.00
	Rosco's Family	10/31/2010	\$60.00
	Rosco's Family	12/4/2009	\$27.38
	Ruby Tuesday	12/2/2009	\$48.44
	Sasha's on Shaw LLC	2/23/2010	\$30.00
	Smity's	9/20/2008	\$45.01
		10/13/2008	\$36.83
		11/14/2008	\$25.64
12/3/2008		\$10.00	
12/5/2008		\$30.90	
12/21/2008		\$29.46	
5/13/2009		\$33.57	
6/8/2009		\$47.70	
8/29/2009		\$44.95	
10/9/2009	\$45.96		

Appendix A
Personal Use Expenditures

Category	Payee	Date	Amount
Food - Restaurant	St Louis Bread	1/15/2010	\$20.33
	Sweetie Pies	1/4/2010	\$12.07
		8/7/2010	\$12.07
	The Best Steak House	8/21/2008	\$26.93
		10/11/2008	\$40.43
	The Fountain	9/18/2008	\$45.00
	The Peach Tree	10/1/2009	\$45.10
	The U	10/8/2008	\$29.14
	Triumph Grill	7/8/2009	\$58.44
	Vito's Restaurant	10/1/2008	\$31.35
		7/18/2009	\$34.42
		12/14/2009	\$25.00
	White Castle	10/3/2008	\$27.53
		11/17/2008	\$10.73
		3/20/2009	\$22.57
		8/10/2009	\$9.50
		9/14/2009	\$13.84
		12/11/2009	\$11.99
		12/19/2009	\$13.36
		12/23/2009	\$13.99
4/6/2010		\$6.92	
8/8/2010		\$18.43	
11/22/2010	\$7.13		
Medical	Medical West Health	11/25/2009	\$45.17
QVC	QVC	6/16/2009	\$96.43
		6/17/2009	\$43.27
		7/17/2009	\$96.43
		8/17/2009	\$96.43
		9/17/2009	\$96.43
		10/18/2009	\$96.43
Subscriptions	Angie's List	11/17/2008	\$57.00
		11/2/2009	\$59.00
Tickets	Park Tickets 444	3/31/2009	\$120.00
	Scot Trade Tickets	8/8/2010	\$362.50
Video Games	GameStop	12/22/2009	\$100.00