

**BEFORE THE
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,)	
)	
Petitioner,)	
)	
v.)	
)	Case No. 20-0001-A
CHRISTINE INGRASSIA,)	19-0007-I
Candidate,)	
)	
and)	
)	
FRIENDS OF CHRISTINE)	
INGRASSIA,)	
Candidate Committee,)	
)	
Respondents.)	

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER

This is the decision and order of the Missouri Ethics Commission following a hearing on a legal complaint filed by Petitioner pursuant to Section 105.961, RSMo, and Chapter 536, RSMo. The hearing was conducted before the following members of the Missouri Ethics Commission: Cheryl D.S. Walker, Sherman W. Birkes, Jr., Wayne Henke, and Robert C. Cook, and Helene J. Frischer.

The Commission held the closed hearing on October 20, 2020, at the offices of the Missouri Ethics Commission at 3411A Knipp Drive, Jefferson City, Missouri 65109. The Commission was represented by Brian Hamilton. Respondents did not appear after due notice.

Having considered all the competent and substantial evidence upon the whole record, the Commission finds by a unanimous vote as follows:

FINDINGS OF FACT

1. The Missouri Ethics 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.¹

FACTS RELEVANT TO ALL COUNTS

2. Respondent Ingrassia was a successful candidate for the St. Louis Board of Aldermen Ward 6 in the April 2, 2019 primary election. Respondent Ingrassia has held this office since 2013, and her current term ends in 2023.

3. Respondent Ingrassia registered her candidate committee, Friends of Christine Ingrassia, by filing a Statement of Committee Organization with the Missouri Ethics Commission on November 28, 2012. The Statement of Committee Organization has been amended several times and was last amended on April 11, 2018.

COUNT I

Failure to maintain an official fund depository

4. Respondents listed Bank of America, with an account number ending in *6389, as the official depository account on an amended Statement of Committee Organization dated January 17, 2014. This account was closed on May 5, 2017.

5. Respondents listed Commerce Bank, with an account number ending in *5486, as the official depository account on an amended Statement of Committee Organization dated April 6, 2018. This account was closed on September 9, 2019.

¹ Unless noted otherwise, all statutory references are to the Revised Statutes of Missouri 2000 (Supp. 2019).

COUNT II

Personal use of committee funds

6. On twelve different transactions, Respondents used committee funds, totaling \$107.36, which did not appear to be for committee purposes.

Report Name	Expenditure Name	Purpose	Amount	Date
Not Reported	Mimosa Beauty Salon	Unknown	\$35.00	9/7/18
Not Reported	Prime Video	Unknown	\$3.99	9/6/18
Jan Quarterly 2019	Kindle Svcs	Entertainment	\$8.46	10/16/18
Jan Quarterly 2019	Prime Video	Entertainment	\$5.99	10/22/18
Jan Quarterly 2019	Prime Video	Entertainment	\$9.99	10/22/18
Jan Quarterly 2019	Prime Video	Entertainment	\$3.99	10/26/18
Jan Quarterly 2019	Prime Video	Entertainment	\$3.99	11/5/18
Jan Quarterly 2019	Prime Video	Entertainment	\$5.99	11/5/18
Jan Quarterly 2019	Prime Video	Entertainment	\$5.99	11/9/18
Jan Quarterly 2019	Nintendo *Americaus	Entertainment	\$9.99	11/13/18
Jan Quarterly 2019	Prime Video	Entertainment	\$3.99	11/13/18
8 Day Before General Election 4/2/19	Microsoft*Xbox	Unknown	\$9.99	3/18/19
Total			\$107.36	

COUNT III

Commingling committee fund with funds of others

7. Respondents reported receipt of five contributions via PayPal, totaling \$1,275.00, that were deposited into Respondent Ingrassia’s personal bank account.

Report Name	Contributor Name	Amount	Date
Amended April Quarterly 2018	Mark Ratterman	\$1,000.00	9/1/16
Amended April Quarterly 2018	Susan Herzberg	\$100.00	9/4/16
Amended April Quarterly 2018	Damon Haymer	\$50.00	9/15/16
Amended April Quarterly 2018	Gary Sadler	\$100.00	10/4/16
Amended April Quarterly 2018	Walker Hamilton	\$25.00	1/27/17
Total		\$1,275.00	

COUNT IV

Failure to accurately report money on hand

8. Respondents inaccurately reported the beginning money on hand on at least one report in 2016, three reports in 2018, and seven reports in 2019.

9. Respondents inaccurately reported the ending money on hand on at least one report in 2017, three reports in 2018, and six reports in 2019.

COUNT V

Failure to timely and accurately file campaign finance disclosure reports

10. Respondents failed to timely file one report in 2016, three reports in 2017, and three reports in 2018.

Report Name	Year	Due Date	Date Filed
October Quarterly	2016	7/15/16	3/12/18
January Quarterly	2017	1/16/17	3/12/18
April Quarterly	2017	4/17/17	3/14/18
October Quarterly – Statement of Limited Activity	2017	10/16/17	3/12/18
January Quarterly – Statement of Limited Activity	2018	1/15/18	3/12/18
July Quarterly	2018	7/16/18	10/29/18
October Quarterly	2018	10/15/18	10/29/18

11. Respondents failed to file the 2019 April Quarterly Report.

12. Respondents filed three Statements of Limited Activity that should have been filed as full disclosure reports because the contributions and/or expenditures exceeded \$500.00 for each reporting period. The 2017 July Quarterly Report should have included a credit of \$3,316.32 from Bank of America. The 2018 April Quarter Report was amended in February 2019 to a full disclosure report that included contributions exceeding \$500. The 2019 October Quarterly Report had expenditures that exceeded \$500.

Report Name	Year	Start Date	End Date	Due Date
July Quarterly – Statement of Limited Activity	2017	4/1/17	6/30/17	7/17/17
April Quarterly – Statement of Limited Activity	2018	1/1/18	3/31/18	4/16/18
October Quarterly – Statement of Limited Activity	2019	7/1/19	9/30/19	10/15/19

COUNT VI

Failure to report contributions received

13. Respondents failed to report sixteen contributions, totaling \$4,550.00.

Contributor Name	Amount	Date	Report Not Showing Contribution
Reinvest STL	\$250.00	4/12/16	July Quarterly 2016
Gregory S. Mullenix	\$250.00	9/27/16	Oct Quarterly 2016
EQH-St. Louis Market Street, LLC	\$500.00	9/27/16	Oct Quarterly 2016
Michael Mullenix	\$250.00	9/27/16	Oct Quarterly 2016
Schlichter Bogard & Denton, LLP	\$150.00	9/27/16	Oct Quarterly 2016
Justin Siegel	\$250.00	12/4/18	Jan Quarterly 2019
Ronald & Judy Taylor	\$200.00	12/10/18	Jan Quarterly 2019
Katherine & Martin Casas	\$250.00	12/10/18	Jan Quarterly 2019
Matthew McBride	\$150.00	12/10/18	Jan Quarterly 2019
CHIPP Political Account	\$1,000.00	12/10/18	Jan Quarterly 2019
Business Environments, Inc.	\$250.00	12/10/18	Jan Quarterly 2019
Salient Realty Group, LLC	\$250.00	12/10/18	Jan Quarterly 2019
Renaissance Development Associates LLC	\$200.00	12/10/18	Jan Quarterly 2019
Elizabeth & Keith Wolkoff	\$150.00	12/10/18	Jan Quarterly 2019
Mary Anne Pikrone	\$200.00	12/17/18	Jan Quarterly 2019
Gilbert Newberry	\$250.00	12/17/18	Jan Quarterly 2019
Total	\$4,550.00		

14. Respondents failed to accurately report twenty-five contributions of \$100 or less, totaling \$1,995.00, on five different reports between 2018 and 2019. Some of the contributions should have been itemized because of the aggregated amount or were already itemized with an incorrect aggregate amount, while others were reported on the wrong report.

15. Respondents failed to accurately report forty-one contributions over \$100, totaling \$16,850.00, on six different reports between 2016 and 2019. Some of the contributions were reported with incorrect aggregate amounts, contributor names, or employer/occupation information, while others were reported on the wrong report.

16. Respondents failed to timely report five contributions, totaling \$2,425.00, on the 2018 April Quarterly Report that was due on April 16, 2018; the contributions were not reported until February 19, 2019.

COUNT VII

Failure to timely and accurately report expenditures and contributions made

17. Respondents failed to report fifty-two expenditures of \$100 or less, totaling \$1,126.41.

Expenditure Name	Amount	Date	Report Not Showing Expenditure
Lafayette Square Restoration Committee	\$100.00	8/24/16	Oct Quarterly 2016
Nationbuilder	\$89.00	6/2/18	July Quarterly 2018
Stl Tax Maryland Heights, MO	\$51.89	12/24/18	Jan Quarterly 2019
Sq *Uvc Washington, DC	\$10.91	9/5/18	Oct Quarterly 2018
Mimosa Beauty Salon, Washington, DC	\$35.00	9/5/18	Oct Quarterly 2018
Unknown	\$64.00	9/6/18	Oct Quarterly 2018
Prime Video	\$3.99	9/14/18	Oct Quarterly 2018
Amazon Marketplace	\$11.98	10/21/18	Jan Quarterly 2019
PayPal Giving Fund	\$50.00	11/4/18	Jan Quarterly 2019
USPS	\$7.35	2/21/19	8 Day Before Special - 3/5/19
Domino's	\$40.64	2/25/19	8 Day Before General - 4/2/19
Postmates tip	\$2.00	3/1/19	8 Day Before General - 4/2/19
Van Gogh St. Louis, MO	\$72.47	3/1/19	8 Day Before General - 4/2/19
Postmates Soular	\$15.28	3/2/19	8 Day Before General - 4/2/19
Postmates tip	\$2.29	3/2/19	8 Day Before General - 4/2/19
Postmates Tower	\$22.05	3/3/19	8 Day Before General - 4/2/19
Sq *Steve's Hot Dog St. Louis, MO	\$27.42	3/4/19	8 Day Before General - 4/2/19
Sq *2 Girls 4 Wheel St. Louis, MO	\$12.00	3/15/19	8 Day Before General - 4/2/19
Sq *Kitchen House Coffee	\$7.58	3/20/19	8 Day Before General - 4/2/19
Postmates tip	\$1.00	3/20/19	8 Day Before General - 4/2/19
Uber	\$6.55	6/29/19	July Quarterly 2019
Uber	\$10.02	6/29/19	July Quarterly 2019
Uber	\$7.78	6/29/19	July Quarterly 2019
Uber	\$20.19	7/2/19	Oct Quarterly 2019
Nationbuilder	\$89.00	7/2/19	Oct Quarterly 2019
Uber	\$10.36	7/3/19	Oct Quarterly 2019
Uber	\$5.00	7/3/19	Oct Quarterly 2019
Uber	\$8.07	7/3/19	Oct Quarterly 2019
Uber	\$20.74	7/3/19	Oct Quarterly 2019

Uber	\$22.10	7/3/19	Oct Quarterly 2019
Uber	\$9.92	7/4/19	Oct Quarterly 2019
Uber	\$9.15	7/8/19	Oct Quarterly 2019
Uber	\$7.75	7/10/19	Oct Quarterly 2019
Uber	\$18.08	7/11/19	Oct Quarterly 2019
Uber	\$21.89	7/11/19	Oct Quarterly 2019
Uber	\$6.18	7/11/19	Oct Quarterly 2019
Sq *Steve's Hot Dog	\$8.21	7/11/19	Oct Quarterly 2019
Uber	\$6.71	7/12/19	Oct Quarterly 2019
Uber	\$9.99	7/12/19	Oct Quarterly 2019
Uber	\$7.19	7/12/19	Oct Quarterly 2019
Uber	\$11.70	7/12/19	Oct Quarterly 2019
Uber	\$7.20	7/12/19	Oct Quarterly 2019
Uber	\$10.12	7/13/19	Oct Quarterly 2019
Uber	\$9.35	7/13/19	Oct Quarterly 2019
Uber	\$10.82	7/13/19	Oct Quarterly 2019
Uber	\$14.57	7/13/19	Oct Quarterly 2019
Uber	\$30.28	7/14/19	Oct Quarterly 2019
Uber	\$6.30	7/14/19	Oct Quarterly 2019
Uber	\$6.34	7/14/19	Oct Quarterly 2019
Commerce Bank	\$11.00	7/15/19	Oct Quarterly 2019
Commerce Bank	\$37.00	7/16/19	Oct Quarterly 2019
Brian Winger Muhle	\$40.00	7/9/19	Oct Quarterly 2019
Total	\$1,126.41		

18. Respondents failed to report three expenditures over \$100.00, totaling \$2,276.34.

Expenditure Name	Amount	Date	Report Not Showing Expenditure
St. Louis Dem Central Committee	\$373.00	11/26/18	Jan Quarterly 2019
Anne Schweitzer	\$103.34	3/15/19	8 Day Before General - 4/2/19
Midwest Compliance	\$1,800.00	7/10/19	Oct Quarterly 2019
Total	\$2,276.34		

19. Respondents failed to report \$8,430.00 in incurred expenditures to the law office of Jacobson Press, PC. for legal services rendered between June 2019 to February 2020.

20. Respondents failed to accurately report thirty-four expenditures of \$100 or less, totaling \$1,453.50, on five different reports between 2016 and 2019. Some of the expenditures were reported with incorrect amounts, incorrect names, or on the wrong report; while others did not include addresses for campaign workers.

21. Respondents failed to accurately report seven expenditures over \$100, totaling \$3,885.00, on six different reports between 2016 and 2019. Some of the expenditures were reported with incorrect amounts, addresses, or aggregate amounts for payments to campaign workers, and one was not reported in the appropriate section on the report.

COUNT VIII

Reporting contributions and expenditures that were not found in the official depository account

22. Respondents reported at least nine contributions totaling \$5,437.17 and one \$19.31 miscellaneous receipt that were not deposited in the official depository account.

Report Name	Contributor Name	Date	Amount
Amended July Quarterly 2016	Unknown	N/A	\$275.70
Amended Oct Quarterly 2016	Unknown	N/A	\$1,325.00
Amended July Quarterly 2018	Unknown	N/A	\$25.00
Amended Jan Quarterly 2019	Unknown	N/A	\$3,023.97
40 Day Before Special - 3/5/19	William E. Brush	1/9/19	\$100.00
40 Day Before Special - 3/5/19	Robert M Bruch	1/9/19	\$100.00
40 Day Before Special - 3/5/19	Tammara Goldschmidt	1/9/19	\$100.00
8 Day Before Special - 3/5/19	Jennifer Dunn Stewart	2/8/19	\$100.00
8 Day Before Special - 3/5/19	SJ Creek	2/7/19	\$387.50
July Quarterly 2019	Domino's Pizza refund	N/A	\$19.31
Total			\$5,456.48

23. Respondents reported at least eighteen expenditures totaling \$1,563.58 that were not made from the official depository account.

Report Name	Expenditure Name	Date	Amount
Amended July Quarterly 2016	Food/beverage	N/A	\$33.94
Amended July Quarterly 2016	Food/beverage	N/A	\$6.60
Amended July Quarterly 2016	Overdraft item fee	N/A	\$35.00
Amended July Quarterly 2016	Banking fee	N/A	\$14.00
Amended July Quarterly 2016	Bank fee	N/A	\$20.34
Amended July Quarterly 2016	Fees	N/A	\$382.00
Amended Oct Quarterly 2016	PayPal Merchant Fees	8/1/16	\$100.00
Amended April Quarterly 2018	Campaign supplies	N/A	\$11.98
Amended April Quarterly 2018	Merchant fees	N/A	\$38.48
Jan Quarterly 2019	Gasoline	N/A	\$51.89
July Quarterly 2018	Commerce Bank	4/30/18	\$134.00

July Quarterly 2018	Uber	6/2/18	\$106.67
Jan Quarterly 2019	Merchant fees	N/A	\$73.97
8 Day Before Special - 3/5/19	PayPal	2/21/19	\$183.58
8 Day Before General - 4/2/19	Banking fees	N/A	\$13.50
8 Day Before General - 4/2/19	Campaign literature	N/A	\$45.05
8 Day Before General - 4/2/19	Meals & Catering	N/A	\$261.02
July Quarterly 2019	Merchant fees	N/A	\$51.56
Total			\$1,563.58

CONCLUSIONS OF LAW

COUNT I

Failure to maintain an official fund depository

24. Every committee must maintain a single “official fund depository within this state which shall be a federally or state-chartered bank, a federally or state-chartered savings and loan association, or a federally or state-chartered credit union in which the committee shall open and thereafter maintain at least one official depository account in its own name.” § 130.021.4(1), RSMo.

25. There is probable cause to believe that Respondents violated Section 130.021.4(1), RSMo, by failing to maintain an official depository account while having an active candidate committee.

COUNT II

Personal use of committee funds

26. “Contributions... received by any committee shall not be converted to any personal use.” § 130.034.1, RSMo.

27. There is probable cause to believe that Respondents violated Section 130.034.1, RSMo, by using committee funds for personal use.

COUNT III

Commingling committee fund with funds of others

28. “Contributions received by a committee shall not be commingled with any funds of an agent of the committee, a candidate or any other person, except that contributions from a candidate of the candidate’s own funds to the person’s candidate committee shall be deposited to an official depository account of the person’s candidate committee.” §130.021.4(1), RSMo.

29. There is probable cause to believe that Respondents violated Section 130.021.4(1), RSMo, by commingling committee funds with Respondent Ingrassia’s personal funds.

COUNT IV

Failure to accurately report money on hand

30. Pursuant to Sections 130.041.1(2) and 130.041.1(5), RSMo, 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.

31. There is probable cause to believe that Respondents violated Sections 130.041.1(2) and 130.041.1(5), RSMo, by failing to accurately report beginning and ending money on hand on twelve different reports between 2016 and 2019.

COUNT V

Failure to timely and accurately file campaign finance disclosure reports

32. Pursuant to Section 130.046.1(3), RSMo, all committees must file regular campaign finance disclosure reports at the following times and for the following periods: “(3) Not later than the fifteenth day following the close of each calendar quarter.”

33. Pursuant to Section 130.046.5(2), RSMo:

No disclosure report needs to be filed for any reporting period if during that reporting period the committee has neither received contributions aggregating more than five hundred dollars nor made expenditure aggregating more than five hundred dollars and has not received contributions aggregating more than three hundred

dollars from any single contributor and if the committee's treasurer files a statement with the appropriate officer that the committee has not exceeded the identified thresholds in the reporting period.

34. There is probable cause to believe that Respondents violated Sections 130.046.1(3) and 130.046.5(2), RSMo, by failing to timely file seven quarterly reports, by failing to file one quarterly report, and by filing three Statements of Limited Activity that should have been full disclosure reports.

COUNT VI

Failure to report contributions received

35. All committees are required to report receipts for each reporting period, including:

(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;

(b) Total amount of all anonymous contributions accepted;

(c) Total amount of all monetary contributions received through fund-raising events or activities from participants whose names and addresses were not obtained with such contributions, with an attached statement or copy of the statement describing each fund-raising event as required in subsection 6 of section 130.031;

(d) Total dollar value of all in-kind contributions received;

(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;

(f) A listing of each loan received by name and address of the lender and date and amount of the loan. For each loan of more than one hundred dollars, a separate

statement shall be attached setting forth the name and address of the lender and each person liable directly, indirectly or contingently, and the date, amount and terms of the loan[.]

§ 130.041.1(3), RSMo.

36. There is probable cause to believe that Respondents violated Section 130.041.1(3), RSMo, by failing to report sixteen contributions, inaccurately reporting sixty-six contributions, and by reporting five contributions untimely.

COUNT VII

Failure to timely and accurately report expenditures and contributions made

37. All committees are required to report expenditures for each reporting period, including:

(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;

(c) The total dollar value of all in-kind expenditures made;

(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;

(e) A list of each loan made, by name and mailing address of the person receiving the loan, together with the amount, terms and date[.]

§ 130.041.1(4), RSMo.

38. There is probable cause to believe that Respondents violated Section 130.041.1(4), RSMo, by failing to report fifty-five expenditures, failing to report an incurred expenditure, and by inaccurately reporting forty-one expenditures.

COUNT VIII

*Reporting contributions and expenditures that were
not found in the official depository account*

39. “Contributions shall not be accepted and expenditures shall not be made by a committee except by or through an official depository account[.]” § 130.021.4(1), RSMo.


40. There is probable cause to believe that Respondents violated Section 130.021.4(1), RSMo, by reporting the receipt of contributions and making expenditures that were not found in the official depository account.

ORDER

The Missouri Ethics Commission finds probable cause to believe that Respondents Christine Ingrassia, and her candidate committee Friends of Christine Ingrassia, have violated Sections 130.021.4(1), 130.034.1, 130.041.1(2)-(5), 130.046.1(3), and 130.046.5(2), RSMo.

1. Respondents shall comply with all relevant sections of Chapter 130, RSMo.
2. Respondents shall file and amend all reports and statements pertaining to this Order.
3. Respondents shall disclose the existence of all bank accounts that have been and currently are associated with the candidate committee, Friends of Christine Ingrassia.
4. For the violations associated with case number 19-0007-I and 20-0001-A, it is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$28,783, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$4,121 of that fee within forty-five days after the date of the Order, and if Respondents comply with conditions detailed in paragraphs 2 and 3 (above), then the remainder of this fee will be stayed. The fee shall be paid by check or money order made payable to the Missouri Ethics Commission.
5. Regardless of the stay in paragraph 4 above, if there is probable cause to believe that any Respondent has committed any further violation of the campaign finance laws under Chapter 130, RSMo, within the two-year period from the date of this Order, then the Respondent who committed the violation will be required to pay the remainder of the fee. The fee will be due immediately upon final adjudication finding that there is probable cause to believe that such Respondent has committed such a violation.
6. Upon this finding that there is probable cause to believe Respondents committed violations of the campaign finance laws pursuant to Chapter 130, RSMo, the stay associated with case number 16-0004-A is invalidated and Respondents shall pay the remainder of the fee in the amount of \$17,181.00 pursuant to the Consent Order filed on January 9, 2018.
7. Respondents shall be jointly and severally liable for all fees imposed under this Order.

SO ORDERED, this 20th day of October, 2020.


Cheryl D.S. Walker, Chair