

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

NOV 13 2024

Missouri Ethics
Commission

MISSOURI ETHICS)	
COMMISSION,)	
)	
Petitioner,)	
)	
v.)	Case No. 21-0002-A; 21-0020-I
)	
COMMITTEE TO ELECT)	
HERDOSIA BENTUM,)	
Candidate Committee,)	
)	
and)	
)	
HERDOSIA BENTUM)	
KALAMBAYIA,)	
Candidate,)	
)	
Respondents.)	

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

The Missouri Ethics Commission (“MEC”), together with Herdosia Bentum Kalambayia and Committee to Elect Herdosia Bentum (“Respondents”), collectively the “parties” jointly stipulate and consent to action as set forth here (the “agreement”).

Respondents acknowledge their right to have this agreement reviewed by counsel. Respondents further acknowledge they have received actual notice of the legal complaint filed by the MEC in this case, have reviewed the contents of the Complaint, and submit to the jurisdiction of the Missouri Ethics Commission.

Respondents further acknowledge they are aware of the various rights and privileges afforded by law, including but not limited to: the right to appear and be

represented by counsel at a hearing before the MEC; the right to have all allegations against Respondents proven upon the record by competent and substantial evidence; the right to cross-examine any witnesses appearing at the hearing against Respondents; the right to present evidence on Respondents' behalf at the hearing; and the right to a decision upon the record of the hearing. Being aware of these rights, Respondents knowingly and voluntarily waive each one of these rights and freely enters into this agreement and agrees to abide by its terms.

I.

The parties mutually agree and stipulate, subject to adoption by the Missouri Ethics Commission, the following shall constitute the Findings of Fact and Conclusions of Law in this matter:

FINDINGS OF FACT

1. Committee to Elect Herdosia Bentum was a candidate committee first registered with the MEC on October 1, 2020, and terminated on June 17, 2021.
2. Herdosia Bentum Kalambyia ("Bentum") was an unsuccessful candidate for third ward alderperson in the City of St. Louis, MO in the 2021 general municipal election.
3. Pursuant to § 105.961, the Commission's staff received a complaint against Respondent. Upon investigation of the allegations, a report was presented to the Commission.

4. Pursuant to § 105.959, the Commission staff conducted an audit of the reports and statements filed with the Commission. Upon investigation, a report was presented to the Commission.

5. Upon consideration of both reports, the Commission determined there were reasonable grounds to believe violations of Chapter 130 and the Missouri Constitution occurred and authorized a hearing pursuant to § 105.961.3.

Count I

Failure to Report Treasurer Change

6. At the time of Respondents' initial filing of a statement of committee organization, Candice Shelton was the treasurer.

7. At least as early as March of 2021, Candice Shelton was no longer able to be treasurer, due to a medical incapacitation.

8. Others took on the duties of treasurer in her absence, during many of the periods at issue in this Complaint.

9. No amendment to the original statement of committee organization was ever filed reflecting the change in who was executing the duties of treasurer.

Count II

Failure to File Report

10. Respondents never filed the April 2021 Quarterly Report.

Count III

Failure to File Statement of Committee Organization or Transfer Funds

11. As previously discussed, Respondent Committee to Elect Herdosia Bentum was terminated on May 6, 2021, after Bentum's unsuccessful candidacy, as required by law.

12. At the time of termination, Committee to Elect Herdosia Bentum reported a balance of \$1,264.41 to be transferred to a new committee.

13. No such transfer ever occurred.

14. Rather than transferring the committee's bank account and assets to a new committee, for a new election cycle, as permitted by law, Respondents simply terminated the old committee and continued acting in every manner as a committee ("new committee"), but without registration.

15. Further, by at least as early as August of 2021, the new committee had accepted over \$500 in contributions.¹

Count IV

Failure to Timely and Accurately Report Contributions

In-Kind Contribution Unreported

16. Respondents utilized space in a building located at 3111 North Grand Blvd., St. Louis, Missouri, as a campaign headquarters, which was not owned by Respondents.

17. Respondents were not charged for use of the space.

18. The utilization of the space has a non-zero monetary value as it is a commercial storefront which, in the normal course of business, requires payment of rent.

19. The uncharged rent for the use of a commercial storefront was an in-kind contribution to Respondent Bentum's election efforts.

¹ Appendix A here details all unreported contributions, which include those referenced here, they are separated out under "New Committee" for the ease of the reader.

20. No in-kind contribution received from the landlord for the use of the office space was ever reported to the Missouri Ethics Commission.

Individual Contributions Unreported

21. From at least March of 2021 through June of 2021 Respondents received contributions totaling \$2,809 from 79 separate contributions, which as of the time of the filing of this Complaint, have not been reported to the MEC. They are detailed in Figure A of the Appendix, incorporated here by reference.

Misc. Receipts Unreported

22. Respondents further received three miscellaneous receipts, totaling \$260.96, which were never reported, as detailed in Figure B of the Appendix and incorporated here by reference.

Individual Contributions Improperly Reported

23. On at least two reports, Respondents failed to properly report details and itemize, as required by Section 130.041.1(3)(e) on at least 24 individual contributions, totaling \$5,243, as detailed in Figure C of the Appendix, and incorporated here by reference.

Count V

Contribution from a Candidate Committee

24. At all relevant times here, Committee to Elect Masimba was a candidate committee registered with the MEC.

25. On March 11, 2021, Committee to Elect Masimba gave a \$2,000 contribution to Respondents.

26. Committee to Elect Masimba reported the contribution on its April 2021 Quarterly Report.

27. Respondents reported the contribution on the April 6, 2021, 8 Day Before Election Report as coming from Ticharwa Masimba.

Count VI

Failure to Timely and Accurately Report Expenditures

Expenditures Unreported

28. From at least October of 2020 through June of 2021, Respondent's made 182 expenditures, totaling \$23,655.43 which, as of the time of this filing, have never been reported, detailed in Figure D of the Appendix, and incorporated here by reference.

Expenditures Improperly Reported

29. From at least January of 2021 through February of 2021, Respondents improperly reported 12 expenditures, totaling 1,023.03, as detailed in Figure E of the Appendix, and incorporated here by reference.

Count VII

Failure to Make Expenditures from Fund Account

30. Respondents reported \$75 in gas purchase(s) on the 8 Day Before May 2, 2021, Election report, which never appears in the depository account for the committee.

31. Respondents also reported \$35 in postage purchased on the 8 Day Before May 2, 2021, Election, which never appears in the depository account for the committee.

Count VIII

Unauthorized Use of Committee Funds

32. Respondents reported an expenditure of \$330.19 to Ameren Electric on its January 2021 Quarterly Report, designated as "Past Due/Campaign Headquarters."

33. At the time of the expenditure, the committee had only been in existence for a little over a month, making a past due utility bill an impossibility.

34. The money was appropriated to use of electricity unrelated to Bentum's campaign.

35. Where \$330.19 in contributions to Respondents was spent on a personal utility bill, there is probable cause to believe Respondents violated § 130.034 empowering this Commission to act, as permitted by law.

CONCLUSIONS OF LAW

Count I

Failure to Report Treasurer Change

36. Section 130.021.7 details the obligation of a committee to update its statement of committee organization, including the identity of its treasurer as required by § 130.021.5(3), stating:

A committee which has filed a statement of organization and has not terminated shall not be required to file another statement of organization, except that when there is a change in any of the information previously reported as required by subdivisions (1) to (8) of subsection 5 of this section an amended statement of organization shall be filed within twenty days after the change occurs, but no later than the date of the filing of the next report required to be filed by that committee by section 130.046.

37. Where Candice Shelton ceased being able to execute the duties of treasurer, and where others undertook those duties, Respondents were required under § 130.021.7 to file an amended statement of committee organization within 20 days of the change. Where they failed to do so, there is probable cause to believe Respondents violated §130.021, empowering this Commission to act, as permitted by law.

Count II

Failure to File Report

38. Section 130.041 requires the candidate and/or treasurer or deputy treasurer of every committee to file disclosure reports of all receipts and expenditures, as prescribed in § 130.046.

39. Section 130.046 lists the timing for the filing of reports required by § 130.041, stating, in part:

1. The disclosure reports required by section 130.041 for all committees shall be filed at the following times and for the following periods:

...

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

...

3. The candidate, if applicable, treasurer or deputy treasurer of a committee shall file disclosure reports pursuant to this section, except for any calendar quarter in which the contributions received by the committee or the expenditures or contributions made by the committee do not exceed five hundred dollars. The reporting dates and periods covered for such quarterly reports shall not be later than the fifteenth day of January, April, July and October for periods closing on the thirty-first day of December, the thirty-first day of March, the thirtieth day of June and the thirtieth day of September... Every candidate, treasurer or deputy treasurer shall file, at a minimum, the campaign disclosure reports covering the quarter immediately preceding the date of the election...

40. Where the April 2021 Quarterly Report was required to be filed on time by §§ 130.041 and 130.041.3, and where Respondents failed to do so, there is probable cause to believe Respondents violated §§ 130.041 and 130.041.3, giving this Commission power to act, as permitted under § 105.961.

Count III

Failure to File Statement of Committee Organization or Transfer Funds

41. Section 130.011(9) defines a candidate committee as:

a committee which shall be formed by a candidate to receive contributions or make expenditures in behalf of the person's candidacy and which shall continue in existence for use by an elected candidate or which shall terminate the later of either thirty days after the general election for a candidate who was not elected or upon the satisfaction of all committee debt after the election, except that no committee retiring debt shall engage in any other activities in support of the candidate for which the committee was formed...

42. Section 130.016.1 sets thresholds, below which candidates are not required to form a committee, stating:

No candidate for statewide elected office, general assembly, or municipal office in a city with a population of more than one hundred thousand shall be required to comply with the requirements to file a statement of organization or disclosure reports of contributions and expenditures for any election in which neither the aggregate of contributions received nor the aggregate of expenditures made on behalf of such candidate exceeds five hundred dollars and no single contributor, other than the candidate, has contributed more than three hundred twenty-five dollars...

43. In evaluating whether activity reaches the threshold of requiring a committee, the definition of contribution is probative, § 130.011(12) defines a contribution as any:

payment, gift, loan, advance, deposit, or donation of money or anything of value for the purpose of supporting or opposing the nomination or election of any candidate for public office[.]

44. The definition of expenditure is similarly relevant, defined in §130.011(16), as any:

payment, advance, conveyance, deposit, donation or contribution of money or anything of value for the purpose of supporting or opposing the nomination or election of any candidate for public office[.]

45. Also relevant here, § 130.034.2 permits a candidate committee to use contributions to establish a new committee.

46. Where Respondents continued act as a committee beyond termination without transferring contributions to a new committee, and where the new committee accepted over \$500 in contributions in just the first 4 months after the termination, there is probable cause to believe Respondents violated the § 130.021 requirement they register as a new committee in order to transfer funds and accept new contributions in excess of \$500, empowering this Commission to act, as permitted by law.

Count IV

Failure to Timely and Accurately Report Contributions

47. Section 130.041(3)(a) permits the non-itemization of certain contributions in reporting, stating:

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...

48. Section 130.041(3)(d) requires committees to report the “[t]otal dollar value of all in-kind contributions received[.]”

49. Section 130.041.1(3)(e) goes on to require committees to report receipts for each reporting period on all disclosure reports, requiring, in part:

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[.]

50. Where Respondents failed to report the in-kind contribution of campaign office space, \$2,809 in contributions from individuals, \$260.96 in miscellaneous receipts, and misreported another \$5,243 in contributions, there is probable cause to believe they violated § 130.041.1, giving this Commission power to take action, as permitted under § 105.961.

Count V

Contribution from a Candidate Committee

51. Article VIII, § 23.3(4) of the Missouri Constitution details limits on contributions, stating:

No candidate's candidate committee shall accept contributions from, or make contributions to, another candidate committee, including any candidate committee, or equivalent entity, established under federal law.

52. Where Respondents accepted a contribution from a candidate committee, there is probable cause to believe they violated Article VIII, § 23.3(4) of the Missouri Constitution.

Count VI

Failure to Timely and Accurately Report Expenditures

53. Section 130.041.1 lays out what is required of committees in disclosure reports, including:

...

(4) Expenditures for the 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[.]

54. Where 182 expenditures were never reported and 12 expenditures were improperly reported to the Missouri Ethics Commission, there is probable cause to believe Respondents violated § 130.041 empowering this Commission to act, as permitted by law.

Count VII

Failure to Make Expenditures from Fund Account

55. Section 130.021.4(1) details the requires for committees to use the depository fund account, stating, in relevant part:

...Contributions shall not be accepted and expenditures shall not be made by a committee except by or through an official depository account and the committee treasurer, deputy treasurer or candidate...

56. Where Respondents failed to make \$110 in expenditures by and through the official depository account for the committee, there is probable cause to believe they violated 130.021.

Count VIII

Unauthorized Use of Committee Funds

57. Section 130.034.1 prohibits individuals from converting any contribution to personal use.

58. Where \$330.19 in contributions to Respondents was spent on a personal utility bill, there is probable cause to believe Respondents violated § 130.034 empowering this Commission to act, as permitted by law.

II.

Based on the foregoing, the parties mutually agree and stipulate, subject to adoption by the Missouri Ethics Commission, the following shall constitute the Order issued by the Missouri Ethics Commission in this matter:

CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.021, 130.034, and 130.041, RSMo, and Article VIII, § 23.3(4) of the Missouri Constitution and pursuant to § 105.961.4, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130, RSMo.
2. It is the Order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$40,320, pursuant to Section 105.961.4(6), RSMo. The Commission will stay imposition of \$34,192 of that fee on the condition that, beginning in January of 2025, Respondents shall make monthly payments by check or money order made payable to the Missouri Ethics Commission.

All payments should be mailed to:

Office of the Missouri Attorney General
Financial Services Division
Attn: Collections Specialist
P.O. Box 899
Jefferson City, MO 65102-0899

3. Respondents shall pay at least \$150 per month until the entire remaining balance of \$6,128 is paid in full or until forty-two consecutive months have elapsed, whichever comes first.
4. Regardless of the stay and payment plan in paragraph 2 above, if there is probable cause to believe that any Respondent committed any further violation of the campaign finance laws under Chapter 130, RSMo, within the two-year period from the date of this Consent Order, then the Respondent who committed the violation will be required to pay the remainder of the fee. Additionally, the finding of such a violation will void the payment plan and the balance of the fee will be due immediately upon final adjudication finding that there was probable cause to believe such Respondent has committed such a violation.
5. Respondents shall be jointly and severally liable for all fees imposed under this order.

III.

1. The parties understand the Missouri Ethics Commission will maintain this agreement as an open record of the Commission.

2. This agreement does not bind the Missouri Ethics Commission or restrict the remedies available concerning any violations not expressly detailed here, including any future violations.

3. Each party agrees to pay all their own fees and expenses incurred as a result of this case, its litigation, and/or its disposition.

4. Respondents, together with their heirs, assigns, agents, representatives and attorneys, do hereby waive, release, acquit and forever discharge the Missouri Ethics Commission, the Commission's respective members, employees, agents and attorneys including former members, employees, agents and attorneys, of, or from any liability, claim, actions, causes of action, fees, costs, expenses and compensation, including, but not limited to, any claim for attorney's fees and expenses, whether or not now known or contemplated, including, but not limited to, any claims pursuant to Section 536.087, RSMo, as amended, or any claim arising under 42 U.S.C. § 1983, which now or in the future may be based upon, arise out of, or relate to any of the matters raised in this case or its litigation or from the negotiation or execution of this Joint Stipulation. The parties acknowledge that this paragraph is severable from the remaining portions of this agreement in that it survives in perpetuity even in the event that any court or administrative tribunal deems this agreement or any portion thereof void or unenforceable.


5. This agreement shall become effective immediately upon (1) the signature of all parties; (2) adoption of the Joint Proposed Findings of Fact, Conclusions of Law by the Missouri Ethics Commission; and (3) issuance of a Final Order by the Commission, without any further action of the parties.

SO AGREED:

RESPONDENT HERDOSIA BENTUM
KALAMBAYIA

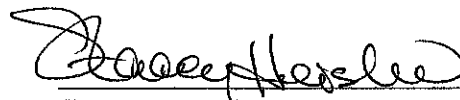
 11/13/24
Date
Herdosia Bentum Kalambayia Date

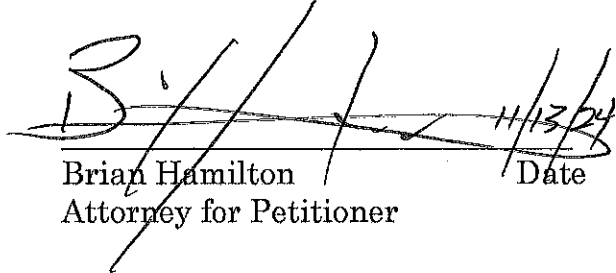
RESPONDENT COMMITTEE TO
ELECT HERDOSIA BENTUM



Herdosia Bentum Kalambayia Date

MISSOURI ETHICS COMMISSION

 11/13/2024
Date
Stacey Heislen
Executive Director

 11/13/24
Date
Brian Hamilton
Attorney for Petitioner

APPENDIX

FIGURE A - Monetary Contributions Unreported			
Contributor Name	Amount	Date	Proper Report
Mel Quintos	\$150.00	3/1/21	8 Day Before General 4/6/21
Darryl Baskerville	\$31.50	3/3/21	8 Day Before General 4/6/21
Penny Joanne Hess	\$400.00	3/6/21	8 Day Before General 4/6/21
Ayesha Fleary	\$20.00	3/7/21	8 Day Before General 4/6/21
Kuumba Nia	\$10.00	3/7/21	8 Day Before General 4/6/21
Oronde Shakur	\$25.00	3/7/21	8 Day Before General 4/6/21
Malika Alexander	\$25.00	3/7/21	8 Day Before General 4/6/21
Virginia Wilson	\$10.00	3/7/21	8 Day Before General 4/6/21
Kiongozi Biniou	\$20.00	3/7/21	8 Day Before General 4/6/21
Gerald Waller	\$30.00	3/7/21	8 Day Before General 4/6/21
Santosh Rohit Yerrabolu	\$30.00	3/7/21	8 Day Before General 4/6/21
Michael Parker Jr	\$10.00	3/7/21	8 Day Before General 4/6/21
Edith Armstrong-Curtis	\$20.00	3/7/21	8 Day Before General 4/6/21
Mel Quintos	\$10.00	3/7/21	8 Day Before General 4/6/21
Jesse Nevel	\$100.00	3/8/21	8 Day Before General 4/6/21
Amanda Carlozzi	\$100.00	3/8/21	8 Day Before General 4/6/21
Jesse Nevel	\$100.00	3/8/21	8 Day Before General 4/6/21
Brenda Angomar	\$10.00	3/9/21	8 Day Before General 4/6/21
ChÁa Cotansuca	\$50.00	3/10/21	8 Day Before General 4/6/21
Virginia Wilson	\$10.00	3/10/21	8 Day Before General 4/6/21
Johann Bedingfield	\$20.00	3/10/21	8 Day Before General 4/6/21
Roger Clendening	\$10.00	3/10/21	8 Day Before General 4/6/21
Ikemba Balanta	\$50.00	3/11/21	8 Day Before General 4/6/21
Claudia Salazar	\$50.00	3/11/21	8 Day Before General 4/6/21
Mel Quintos	\$10.00	3/11/21	8 Day Before General 4/6/21
Mel Quintos	\$10.00	3/13/21	8 Day Before General 4/6/21
Grady Brown	\$5.00	3/13/21	8 Day Before General 4/6/21
Mel Quintos	\$10.00	3/15/21	8 Day Before General 4/6/21
Unknown	\$11.00	3/16/21	8 Day Before General 4/6/21
Mel Quintos	\$15.00	3/16/21	8 Day Before General 4/6/21
Mel Quintos	\$15.00	3/17/21	8 Day Before General 4/6/21
Leah Fifield	\$20.00	3/17/21	8 Day Before General 4/6/21
Renee Nassar	\$10.00	3/18/21	8 Day Before General 4/6/21
Allie Aiello	\$25.00	3/18/21	8 Day Before General 4/6/21
Mel Quintos	\$5.00	3/18/21	8 Day Before General 4/6/21
Mel Quintos	\$10.00	3/19/21	8 Day Before General 4/6/21
Mel Quintos	\$25.00	3/21/21	8 Day Before General 4/6/21
Gerald Waller	\$70.00	3/22/21	8 Day Before General 4/6/21

Mel Quintos	\$5.00	3/22/21	8 Day Before General 4/6/21
Mel Quintos	\$5.00	3/23/21	8 Day Before General 4/6/21
Mel Quintos	\$5.00	3/25/21	8 Day Before General 4/6/21
KC Mackey	\$10.00	3/26/21	April Quarterly 2021
Jorden Giger	\$100.00	3/26/21	April Quarterly 2021
Mel Quintos	\$5.00	3/26/21	April Quarterly 2021
Mel Quintos	\$5.00	3/27/21	April Quarterly 2021
Dennis Newsome	\$100.00	3/28/21	April Quarterly 2021
Mel Quintos	\$10.00	3/28/21	April Quarterly 2021
Jainabah Lumumba-Phillips	\$10.00	3/28/21	April Quarterly 2021
Michael Parker Jr	\$100.00	3/29/21	April Quarterly 2021
Mel Quintos	\$3.00	4/1/21	30 Day After General 4/6/21
Parrish Davis	\$20.00	4/2/21	30 Day After General 4/6/21
Darryl Baskerville	\$31.50	4/3/21	30 Day After General 4/6/21
Michele Brackenridge	\$20.00	4/7/21	30 Day After General 4/6/21
Wendy Craig	\$100.00	4/13/21	30 Day After General 4/6/21
Mara Ratiu	\$25.00	4/18/21	30 Day After General 4/6/21
Indpum NYC	\$20.00	4/30/21	30 Day After General 4/6/21
POST ORIGINAL COMMITTEE TERMINATION FILING			
Darryl Baskerville	\$31.50	5/3/21	July Quarterly 2021
Mara Ratiu	\$25.00	5/18/21	July Quarterly 2021
Renee Nassar	\$10.00	5/18/21	July Quarterly 2021
Gerald Waller	\$70.00	5/22/21	July Quarterly 2021
Darryl Baskerville	\$37.00	5/23/21	July Quarterly 2021
KC Mackey	\$10.00	5/26/21	July Quarterly 2021
Jainabah Lumumba-Phillips	\$10.00	5/28/21	July Quarterly 2021
Indpum NYC	\$20.00	5/31/21	July Quarterly 2021
Darryl Baskerville	\$31.50	6/3/21	July Quarterly 2021
Stripe contribution	\$10.00	Unk	July Quarterly 2021
Stripe contribution	\$70.00	Unk	July Quarterly 2021
Stripe contribution	\$37.00	Unk	July Quarterly 2021
Stripe contribution	\$10.00	Unk	July Quarterly 2021
Stripe contribution	\$20.00	Unk	October Quarterly 2021
Stripe contribution	\$10.00	Unk	October Quarterly 2021
Stripe contribution	\$70.00	Unk	October Quarterly 2021
Stripe contribution	\$10.00	Unk	October Quarterly 2021
Stripe contribution	\$20.00	Unk	October Quarterly 2021
Stripe contribution	\$10.00	Unk	October Quarterly 2021
Stripe contribution	\$70.00	Unk	October Quarterly 2021
Stripe contribution	\$10.00	Unk	October Quarterly 2021
Stripe contribution	\$20.00	Unk	October Quarterly 2021
Stripe contribution	\$10.00	Unk	October Quarterly 2021
Stripe contribution	\$70.00	Unk	October Quarterly 2021

Stripe contribution	\$10.00	Unk	April Quarterly 2022
TOTAL	\$2,809.00		

FIGURE B - Misc. Receipts Unreported			
Receipt Name	Amount	Date	Proper Report
Public Storage Adjustment	\$40.32	3/13/21	8 Day Before General 4/6/21
The Home Depot	\$102.64	N/A	July Quarterly 2016
Deposit refund of fees	\$118.00	N/A	8 Day Before Primary 8/7/18
TOTAL	\$260.96		

FIGURE C - Misreported Contributions			
Reported In	Contributor Name	Amount	Date
January Quarterly 2021	Mychal Odom	\$50.00	12/6/20
January Quarterly 2021	Mychal Odom	\$25.00	12/20/20
January Quarterly 2021	Marisa Martinez	\$25.00	12/21/20
8 Day Before General 4/6/21	Santosh Rohit Yerrabolu	\$30.00	2/20/21
8 Day Before General 4/6/21	Mel Quintos	\$10.00	2/25/21
8 Day Before General 4/6/21	Mel Quintos	\$60.00	3/1/21
8 Day Before General 4/6/21	Dianne Tornay	\$50.00	3/6/21
8 Day Before General 4/6/21	Janice Kant	\$100.00	3/6/21
8 Day Before General 4/6/21	Catherine Reilly	\$100.00	3/6/21
8 Day Before General 4/6/21	Wendy Craig	\$100.00	3/6/21
8 Day Before General 4/6/21	Rhya Fogerty	\$100.00	3/6/21
8 Day Before General 4/6/21	Paul Kessler	\$50.00	3/7/21
8 Day Before General 4/6/21	Deidre Martin	\$100.00	3/8/21
8 Day Before General 4/6/21	Wendy Craig	\$100.00	3/13/21
8 Day Before General 4/6/21	Darryl Baskerville	\$37.00	3/23/21
8 Day Before General 4/6/21	Mel Quintos	\$6.00	3/24/21
January Quarterly 2021	Penny Hess	\$200.00	12/28/20
8 Day Before General 4/6/21	Lisa Watson	\$200.00	3/7/21
8 Day Before General 4/6/21	Maureen Wagener	\$500.00	3/7/21
8 Day Before General 4/6/21	Dena Gittelsohn	\$500.00	3/7/21
8 Day Before General 4/6/21	Alison Hoehne	\$500.00	3/8/21
8 Day Before General 4/6/21	Ticharwa Masimba	\$2,000.00	3/11/21
8 Day Before General 4/6/21	Halley Murray	\$200.00	3/16/21
8 Day Before General 4/6/21	Paul Kessler	\$200.00	3/24/21

FIGURE D - Expenditures Not Reported

Expenditure	Purpose	Amount	Date	Proper Report
USPS	PO Box	\$84.00	10/25/20	January Quarterly 2021
Home Depot	Unknown	\$50.54	11/4/20	January Quarterly 2021
Banners on the Cheap	Printing	\$31.95	11/5/20	January Quarterly 2021
Dollar Tree	Unknown	\$4.37	11/5/20	January Quarterly 2021
Goodwill	Unknown	\$9.00	11/6/20	January Quarterly 2021
Walmart Family Mobile	phone service	\$44.93	11/10/20	January Quarterly 2021
Walmart	Unknown	\$20.59	11/17/20	January Quarterly 2021
Walmart	Unknown	\$54.96	11/20/20	January Quarterly 2021
ATM Fee	Service charge	\$7.20	11/23/20	January Quarterly 2021
FedEx	Unknown	\$22.04	11/24/20	January Quarterly 2021
FedEx	Unknown	\$6.60	11/24/20	January Quarterly 2021
Office Depot	Unknown	\$1.32	11/24/20	January Quarterly 2021
Newsp PD-SJ	Unknown	\$29.00	11/29/20	January Quarterly 2021
Walgreens	Unknown	\$17.55	11/29/20	January Quarterly 2021
Uhaul	Transporting	\$18.90	12/1/20	January Quarterly 2021
ATM Withdrawal	Unknown	\$75.00	12/3/20	January Quarterly 2021
Walmart	Unknown	\$50.59	12/3/20	January Quarterly 2021
BP	Gas	\$10.00	12/4/20	January Quarterly 2021
Walmart	Unknown	\$3.17	12/5/20	January Quarterly 2021
Office Depot	Unknown	\$48.26	12/5/20	January Quarterly 2021
Walmart Family Mobile	phone service	\$44.93	12/11/20	January Quarterly 2021
Walmart	Unknown	\$27.13	12/15/20	January Quarterly 2021
Walmart	Unknown	\$33.26	12/18/20	January Quarterly 2021
Office Depot	Unknown	\$64.03	12/19/20	January Quarterly 2021
Walmart	Unknown	\$30.05	12/21/20	January Quarterly 2021
USPS	Unknown	\$4.10	12/31/20	January Quarterly 2021
Square	Fees	\$204.73	N/A	January Quarterly 2021
Stripe	Fees	\$56.17	N/A	January Quarterly 2021
Weebly	Web hosting	\$150.00	N/A	January Quarterly 2021
ATM Withdrawal	Unknown	\$40.00	1/2/21	40 Day Before Special 3/2/21
Office Depot	Unknown	\$63.03	1/6/21	40 Day Before Special 3/2/21
Walmart	Unknown	\$23.99	1/8/21	40 Day Before Special 3/2/21
Office Depot	Unknown	\$30.71	1/8/21	40 Day Before Special 3/2/21
Office Depot	Unknown	\$15.89	1/11/21	40 Day Before Special 3/2/21
Bing Lau Chop Suey	Food	\$16.20	1/12/21	40 Day Before Special 3/2/21
Walmart Family Mobile	phone service	\$45.11	1/12/21	40 Day Before Special 3/2/21
Office Depot	Unknown	\$2.57	1/13/21	40 Day Before Special 3/2/21
Walmart	Unknown	\$19.89	1/14/21	40 Day Before Special 3/2/21
Weebly	Web hosting	\$29.00	1/15/21	40 Day Before Special 3/2/21
Best Buy	Unknown	\$79.99	1/16/21	40 Day Before Special 3/2/21
Walmart	Unknown	\$52.85	1/16/21	40 Day Before Special 3/2/21

Square	Fees	\$31.88	N/A	40 Day Before Special 3/2/21
Stripe	Fees	\$30.14	N/A	40 Day Before Special 3/2/21
GoFundMe	Fees	\$64.96	N/A	40 Day Before Special 3/2/21
ATM fee	Service charge	\$4.50	N/A	40 Day Before Special 3/2/21
Printful	Printing	\$147.09	N/A	40 Day Before Special 3/2/21
USPS	Mailing	\$39.10	N/A	40 Day Before Special 3/2/21
Walmart	Unknown	\$11.86	1/21/21	8 Day Before Special 3/2/21
ATM Withdrawal	Unknown	\$20.00	1/27/21	8 Day Before Special 3/2/21
ATM Fee	Service charge	\$6.60	1/27/21	8 Day Before Special 3/2/21
Burning Spear Media	Unknown	\$69.00	1/30/21	8 Day Before Special 3/2/21
Office Depot	Unknown	\$20.96	2/2/21	8 Day Before Special 3/2/21
Family Dollar	Unknown	\$3.27	2/2/21	8 Day Before Special 3/2/21
Walmart	Unknown	\$22.75	2/4/21	8 Day Before Special 3/2/21
Walmart	Unknown	\$21.78	2/4/21	8 Day Before Special 3/2/21
Public Storage	Storage	\$61.92	2/6/21	8 Day Before Special 3/2/21
Dollar Tree	Unknown	\$39.42	2/12/21	8 Day Before Special 3/2/21
Walmart	Unknown	\$35.27	2/12/21	8 Day Before Special 3/2/21
Walmart	Unknown	\$32.62	2/12/21	8 Day Before Special 3/2/21
Sam's Club	Unknown	\$56.99	2/13/21	8 Day Before Special 3/2/21
Walmart Family Mobile	phone service	\$42.82	2/13/21	8 Day Before Special 3/2/21
Square	Fees	\$104.99	N/A	8 Day Before Special 3/2/21
Stripe	Fees	\$124.11	N/A	8 Day Before Special 3/2/21
Weebly	Web hosting	\$64.00	N/A	8 Day Before Special 3/2/21
Printful	Printing	\$149.77	N/A	8 Day Before Special 3/2/21
ATM Withdrawal	Unknown	\$50.00	2/20/21	8 Day Before General 4/6/21
BP	Gas	\$32.70	2/20/21	8 Day Before General 4/6/21
Printful	Printing	\$47.84	2/26/21	8 Day Before General 4/6/21
QT	Gas	\$40.00	3/1/21	8 Day Before General 4/6/21
Aldi	Unknown	\$20.95	3/1/21	8 Day Before General 4/6/21
Sam's Club	Unknown	\$13.80	3/2/21	8 Day Before General 4/6/21
Public Storage	Storage	\$54.17	3/3/21	8 Day Before General 4/6/21
Walmart Family Mobile	phone service	\$42.82	3/10/21	8 Day Before General 4/6/21
ATM Withdrawal	Unknown	\$100.00	3/12/21	8 Day Before General 4/6/21
Kingsway Food	Unknown	\$40.00	3/12/21	8 Day Before General 4/6/21
Harbor Freight	Unknown	\$3.64	3/13/21	8 Day Before General 4/6/21
Phillips 66	Gas	\$22.67	3/14/21	8 Day Before General 4/6/21
ATM Withdrawal	Unknown	\$20.00	3/16/21	8 Day Before General 4/6/21
Best Buy	Unknown	\$44.28	3/16/21	8 Day Before General 4/6/21
Menards	Unknown	\$26.27	3/18/21	8 Day Before General 4/6/21
Office Depot	Unknown	\$98.72	3/23/21	8 Day Before General 4/6/21
Square	Fees	\$132.49	N/A	8 Day Before General 4/6/21
Stripe	Fees	\$209.96	N/A	8 Day Before General 4/6/21
Weebly	Web hosting	\$99.00	N/A	8 Day Before General 4/6/21
ATM Fees	Service charge	\$13.00	N/A	8 Day Before General 4/6/21

Communication	Communication	\$230.00	N/A	8 Day Before General 4/6/21
Robocent	Communication	\$50.00	3/27/21	April Quarterly 2021
Robocent	Communication	\$75.00	3/27/21	April Quarterly 2021
Square	Fees	\$16.29	N/A	April Quarterly 2021
Stripe	Fees	\$9.86	N/A	April Quarterly 2021
ATM Withdrawal	Unknown	\$100.00	4/2/21	30 Day After General 4/6/21
Robocent	Communication	\$75.00	4/3/21	30 Day After General 4/6/21
Robocent	Communication	\$60.00	4/3/21	30 Day After General 4/6/21
Galaxy Ballot	Unknown	\$54.00	4/4/21	30 Day After General 4/6/21
Domino's	Food	\$81.33	4/5/21	30 Day After General 4/6/21
HiTec Copy Center	Printing	\$53.56	4/5/21	30 Day After General 4/6/21
Printful	Marketing	\$19.37	4/5/21	30 Day After General 4/6/21
Mailerlite	Marketing	\$50.00	4/6/21	30 Day After General 4/6/21
VIOC	Maintenance	\$61.98	4/6/21	30 Day After General 4/6/21
Robocent	Communication	\$30.00	4/6/21	30 Day After General 4/6/21
Robocent	Communication	\$60.00	4/6/21	30 Day After General 4/6/21
Walmart	Unknown	\$14.94	4/6/21	30 Day After General 4/6/21
BP	Unknown	\$49.00	4/6/21	30 Day After General 4/6/21
Best Buy	Unknown	\$16.60	4/6/21	30 Day After General 4/6/21
Best Buy	Unknown	\$27.68	4/6/21	30 Day After General 4/6/21
HiTec Copy Center	Printing	\$33.32	4/7/21	30 Day After General 4/6/21
Sam's Club	Supplies	\$52.56	4/7/21	30 Day After General 4/6/21
Sam's Club	Supplies	\$4.23	4/7/21	30 Day After General 4/6/21
Instacart for Schnuck's	Unknown	\$84.08	4/9/21	30 Day After General 4/6/21
Walmart Family Mobile	phone service	\$42.87	4/10/21	30 Day After General 4/6/21
Calendly	Scheduling app	\$15.00	4/14/21	30 Day After General 4/6/21
Instacart for Schnuck's	Unknown	\$5.11	4/14/21	30 Day After General 4/6/21
Instacart for Schnuck's	Unknown	\$70.00	4/14/21	30 Day After General 4/6/21
Weebly	Web hosting	\$64.00	N/A	30 Day After General 4/6/21
Communication	Communication	\$115.00	N/A	30 Day After General 4/6/21
Square	Fees	\$7.25	N/A	30 Day After General 4/6/21
Stripe	Fees	\$17.68	N/A	30 Day After General 4/6/21
Gen X Clothing	Clothing	\$104.49	10/15/20	January Quarterly 2021
Sam's Club	Unknown	\$106.03	10/15/20	January Quarterly 2021
FedEx	Unknown	\$221.77	10/17/20	January Quarterly 2021
Unique KPZ	Unknown	\$240.00	10/20/20	January Quarterly 2021
Walmart	Unknown	\$149.00	10/23/20	January Quarterly 2021
Office Depot	Unknown	\$193.31	11/3/20	January Quarterly 2021
Office Depot	Unknown	\$113.42	11/3/20	January Quarterly 2021
Banners on the Cheap	Printing	\$119.06	11/5/20	January Quarterly 2021
Turbo Print Shop	Printing	\$161.19	11/6/20	January Quarterly 2021
Walmart	Unknown	\$177.36	11/9/20	January Quarterly 2021
ATM Withdrawal	Unknown	\$200.00	11/23/20	January Quarterly 2021

ATM Withdrawal	Unknown	\$180.00	11/23/20	January Quarterly 2021
Home Depot	Unknown	\$124.03	11/28/20	January Quarterly 2021
ATM Withdrawal	Unknown	\$120.00	11/30/20	January Quarterly 2021
Heatcore	Unknown	\$149.93	12/1/20	January Quarterly 2021
Curtis Printing	Printing	\$421.72	12/10/20	January Quarterly 2021
Office Depot	Supplies	\$112.97	12/18/20	January Quarterly 2021
Spectrum	TV/Internet	\$152.91	1/11/21	40 Day Before Special 3/2/21
ITECHSHARK	Unknown	\$870.81	1/21/21	8 Day Before Special 3/2/21
Mark's Quick Printing	Printing	\$696.43	1/23/21	8 Day Before Special 3/2/21
ATM withdrawal	Unknown	\$220.00	1/28/21	8 Day Before Special 3/2/21
Office Depot	Supplies	\$116.81	2/1/21	8 Day Before Special 3/2/21
Mally's Market	Food	\$195.93	2/13/21	8 Day Before Special 3/2/21
USPS Every Door Direct	Advertising	\$838.27	2/18/21	8 Day Before Special 3/2/21
USPS	Mailing	\$110.77	3/8/21	8 Day Before General 4/6/21
Mark's Quick Printing	Printing	\$1,189.21	3/10/21	8 Day Before General 4/6/21
Office Depot	Unknown	\$381.14	3/10/21	8 Day Before General 4/6/21
Office Depot	Unknown	\$108.97	3/12/21	8 Day Before General 4/6/21
Walmart	Unknown	\$257.12	3/12/21	8 Day Before General 4/6/21
Walmart	Unknown	\$129.16	3/14/21	8 Day Before General 4/6/21
Office Depot	Unknown	\$307.11	3/16/21	8 Day Before General 4/6/21
Black Star Industries	Donation	\$216.00	3/25/21	8 Day Before General 4/6/21
Simpletexting	Communication	\$235.59	3/25/21	8 Day Before General 4/6/21
Minuteman Press	Printing	\$1,856.60	3/27/21	April Quarterly 2021
Black Star Industries	Donation	\$400.00	3/29/21	April Quarterly 2021
Minuteman Press	Printing	\$1,647.85	3/30/21	April Quarterly 2021
Mark's Quick Printing	Printing	\$418.51	3/30/21	April Quarterly 2021
Facebook	Advertising	\$472.75	3/31/21	April Quarterly 2021
Exact Data	Data	\$550.00	4/2/21	30 Day After General 4/6/21
Google Ads	Advertising	\$350.00	4/4/21	30 Day After General 4/6/21
Instacart	Unknown	\$291.93	4/6/21	30 Day After General 4/6/21
Mesekerem Ethiopian	Food	\$141.85	4/8/21	30 Day After General 4/6/21
Southwest	Airline tickets	\$305.98	4/9/21	30 Day After General 4/6/21
USPS PO Boxes	PO Box	\$102.00	4/17/21	30 Day After General 4/6/21
Facebook	Advertising	\$258.01	4/30/21	30 Day After General 4/6/21
POST ORIGINAL COMMITTEE TERMINATION FILING				
Walmart Family Mobile	phone service	\$42.87	5/10/21	July Quarterly 2021
Calendly	Scheduling app	\$15.00	5/14/21	July Quarterly 2021
Stripe	Fees	\$20.27	N/A	July Quarterly 2021
Communication	Communication	\$160.00	N/A	July Quarterly 2021
Weebly	Web hosting	\$64.00	N/A	July Quarterly 2021
Facebook	Unknown	\$9.79	6/4/21	July Quarterly 2021
Instacart for Schnuck's	Unknown	\$30.36	6/26/21	July Quarterly 2021
Stripe	Fees	\$20.27	N/A	July Quarterly 2021

Stripe	Fees	\$17.38	N/A	October Quarterly 2021
DialPad Meetings	Communication	\$60.00	N/A	October Quarterly 2021
Instacart for Schnuck's	Unknown	\$50.88	7/31/21	October Quarterly 2021
Facebook	Unknown	\$98.76	N/A	October Quarterly 2021
Google Skill Cap	Unknown	\$11.64	N/A	October Quarterly 2021
Cash app-add cash	Unknown	\$25.00	9/28/21	October Quarterly 2021
Cash app-add cash	Unknown	\$49.78	9/28/21	October Quarterly 2021
Cash app-add cash	Unknown	\$3.33	9/28/21	October Quarterly 2021
Instacart for Schnuck's	Unknown	\$48.43	7/3/21	October Quarterly 2021
Google Ads	Advertising	\$406.26	5/3/21	July Quarterly 2021
APEDF	Donation	\$300.00	5/11/21	July Quarterly 2021
Indpdm	Donation	\$918.00	6/7/21	July Quarterly 2021
TOTAL		\$23,655.43		

FIGURE E - Expenditures Improperly Reported

Report Name	Expenditure Name	Purpose	Amount	Date
January Quarterly 2021	Wal-Mart	Money order fee	\$8.00	11/19/20
January Quarterly 2021	Uhaul	Transport	\$18.90	12/1/20
January Quarterly 2021	Walmart	Unknown	\$50.59	12/3/20
January Quarterly 2021	BP	Gas	\$10.00	12/4/20
January Quarterly 2021	Walmart	Unknown	\$3.17	12/5/20
January Quarterly 2021	Weebly	Website	\$29.00	12/16/20
January Quarterly 2021	Weebly	Website	\$35.00	12/20/20
January Quarterly 2021	Walmart	Unknown	\$30.05	12/21/20
January Quarterly 2021	USPS	Mailing/printing	\$4.10	12/31/20
January Quarterly 2021	Leonard Waller	Sign painting	\$150.00	11/19/20
8 Day Before Special 3/2/21	Turbo Print Shop	Postcard printing	\$448.92	2/19/21
8 Day Before Special 3/2/21	Penske Truck Rental	Transportation	\$235.30	3/12/21
Total			\$1,023.03	

Filed

NOV 14 2024

Missouri Ethics
Commission

BEFORE THE
MISSOURI ETHICS COMMISSION

MISSOURI ETHICS)
 COMMISSION,)
)
 Petitioner,)
)
 v.)
)
 COMMITTEE TO ELECT)
 HERDOSIA BENTUM,)
 Candidate Committee,)
)
 and)
)
 HERDOSIA BENTUM)
 KALAMBAYIA, Candidate,)
)
 Respondents.)

Case No. 21-0002-A; 21-0020-I

CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.021, 130.034, and 130.041, RSMo, and Article VIII, § 23.3(4) of the Missouri Constitution and pursuant to § 105.961.4, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130, RSMo.
2. It is the Order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$40,320, pursuant to Section 105.961.4(6), RSMo. The Commission will stay imposition of \$34,192 of that fee on the condition that, beginning in January of 2025, Respondents shall make monthly payments by check or money order made payable to the Missouri Ethics Commission.

All payments should be mailed to:
 Office of the Missouri Attorney General
 Financial Services Division
 Attn: Collections Specialist
 P.O. Box 899
 Jefferson City, MO 65102-0899

3. Respondents shall pay at least \$150 per month until the entire remaining balance of \$6,128 is paid in full or until forty-two consecutive months have elapsed, whichever comes first.
4. Regardless of the stay and payment plan in paragraph 2 above, if there is probable cause to believe that any Respondent committed any further violation of the campaign finance laws under Chapter 130, RSMo, within the two-year period from the date of this Consent Order, then the Respondent who committed the violation will be required to pay the remainder of the fee. Additionally, the finding of such a violation will void the payment plan and the balance of the fee will be due immediately upon final adjudication finding that there was probable cause to believe such Respondent has committed such a violation.
5. Respondents shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 14th day of November, 2024

Robin Wheeler Sanders

Robin Wheeler Sanders, Chair
Missouri Ethics Commission