

Filed

NOV 19 2024

Missouri Ethics
Commission

BEFORE THE
MISSOURI ETHICS COMMISSION

| | | |
|------------------------------|---|--------------------|
| MISSOURI ETHICS |) | |
| COMMISSION, |) | |
| |) | |
| Petitioner, |) | |
| |) | |
| v. |) | Case No. 22-0005-A |
| |) | |
| PAUL BERRY III, Candidate, |) | |
| |) | |
| and |) | |
| |) | |
| PAUL BERRY III FOR ST. LOUIS |) | |
| COUNTY, Candidate Committee, |) | |
| |) | |
| Respondents. |) | |

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

The Missouri Ethics Commission (“MEC”), together with Paul Berry III and Paul Berry III for St. Louis County (“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.

Further, Respondents contend that they did not misappropriate any campaign funds; that all funds were used for legally permissible campaign related activities. Respondents also contend that the reporting errors were largely due to conflicts with a political consultant and vendors that delayed the filings of their campaign finance reports.

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. Respondent Paul Berry III was an unsuccessful candidate for County Executive of St. Louis County in the November 3, 2020, general election.
2. Respondent Paul Berry III for St. Louis County is a candidate committee registered with the Missouri Ethics Commission on July 1, 2020.
3. Pursuant to Sections 105.959 and 105.961, RSMo, the Commission's staff audited the reports and statements filed with the Commission and reported the findings to the Commission.

4. Based on the audit report, the Commission determined that there were reasonable grounds to believe that violations of the law had occurred, and it therefore authorized a hearing in this matter pursuant to Section 105.961.3, RSMo.

COUNT I

Failure to timely amend the Statement of Committee Organization to reflect a change and terminate committee

Failure To Terminate Committee

5. Respondent Paul Berry III for St. Louis County did not have any debts at the time of the termination requirement.

6. Under the definition of candidate committee in § 130.011(9), where the committee was without debt, Respondents were required to terminate within thirty days of the general election on December 3, 2020.

7. Respondent Paul Berry III for St. Louis County did not terminate by December 3, 2020.

Failure To Timely Report Change in Contact Information

8. The address for the committee listed on the Statement of Committee Organization is 3456 McKelvey Rd. in Bridgeton, MO.

9. 3456 McKelvey Rd is no longer the correct address for the committee.

10. Respondents did not amend their Statement of Committee Organization within twenty days of a change in committee address.

Failure To Maintain an Official Depository Account

11. The committee's official depository account was closed June 10, 2021.

12. Respondents did not amend their Statement of Committee Organization within twenty days of a change in official depository account.

COUNT II

Failure to accurately report beginning and ending money on hand

13. The beginning and ending money on hand was inaccurately stated on the 8 Day Before Report for the 8/4/20 primary election and the 2020 October Quarterly Report.

COUNT III

Failure to timely and accurately file campaign finance disclosure reports

14. Respondents failed the October 2020 Quarterly Report one day late.

15. Respondents failed to file a 24-Hour Notice of Late Contributions/Loans Received to report two \$500.00 contributions and a \$2,500.00 contribution, each received on October 29, 2020.

16. Respondents failed to timely file eleven (11) campaign finance reports.

| Report Name | Rpt Year | Start Date | End Date | Due Date |
|---|-----------------|-------------------|-----------------|-----------------|
| 30 Day After Primary Election - 8/4/20 | 2020 | 7/24/20 | 8/29/20 | 9/3/20 |
| 8 Day Before General Election - 11/3/20 | 2020 | 10/1/20 | 10/22/20 | 10/26/20 |
| 24 Hr Notice Late Contributions | 2020 | 10/29/20 | 10/29/20 | 10/30/20 |
| 30 Day After General Election - 11/3/20 | 2020 | 10/23/20 | 11/28/20 | 12/3/20 |
| April Quarterly Report | 2021 | 11/29/20 | 3/31/21 | 4/15/21 |
| July Quarterly Report | 2021 | 4/1/21 | 6/30/21 | 7/15/21 |
| October Quarterly Report | 2021 | 7/1/21 | 9/30/21 | 10/15/21 |
| January Quarterly Report | 2022 | 10/1/21 | 12/31/21 | 1/17/22 |
| April Quarterly Report | 2022 | 1/1/22 | 3/31/22 | 4/15/22 |
| July Quarterly Report | 2022 | 4/1/22 | 6/30/22 | 7/15/22 |
| October Quarterly Report | 2022 | 7/1/22 | 9/30/22 | 10/17/22 |

17. At the conclusion of the audit, Respondents filed all reports and terminated the committee on March 26, 2024.

COUNT IV

Failure to timely and accurately report contributions

18. Respondents failed to timely report ninety-five (95) contributions that were over \$100 each, totaling \$5,400. Of these contributions, one was received from Fashion Connection Dress Boutique, Inc., a corporation, in violation of the Missouri Constitution Art. VIII Sec. 23.3(3)(a). Attachment 1.

19. Respondents failed to timely report forty (40) contributions that were \$100 or less, totaling \$21,530. Attachment 2.

20. Between November 2020 and July 2021, Respondents received twenty-nine (29) miscellaneous receipts, totaling \$237.79, from Central Bank of St. Louis and \$160.02 from FedEx Office. Respondent failed to timely report these miscellaneous receipts.

21. Respondents inaccurately reported three (3) contributions totaling \$1,700.00. One appears to have been reported twice in error, one was reported with an incorrect aggregate amount, and the other was reported without occupation information.

| Report Name | Contributor Name | Employer/ Occupation | Amount | Date | Error |
|------------------------|-------------------------|-----------------------------|-------------------|-------------|----------------------------|
| October Quarterly 2020 | James & Kelley Brugner | None | \$500.00 | 9/11/20 | No occupation |
| October Quarterly 2020 | David Paradise | David Paradise, LLC | \$1,000.00 | 9/29/20 | Reported twice. |
| October Quarterly 2020 | William Pride | Retired | \$200.00 | 9/29/20 | Aggregate should be \$300. |
| Total | | | \$1,700.00 | | |

22. Respondents reported a \$2,500.00 contribution from Steven Goedecker on their October 2020 Quarterly Report. The contribution was refunded to the contributor in the same reporting period. The refund was not reported.

COUNT V

Failure to timely and accurately report expenditures

23. Respondents failed to timely report one hundred twenty-three (123) expenditures that were \$100 or less, totaling \$4,517.38. Attachment 3.

24. Respondents failed to timely report fifty-three (53) expenditures that were over \$100 each, totaling \$24,453.44. Attachment 4.

25. Respondents inaccurately reported a \$125.00 payment made to Facebook for online marketing. The committee incorrectly reported the expenditure as \$100.00.

CONCLUSIONS OF LAW

COUNT I

Failure to timely amend the Statement of Committee Organization to reflect a change and terminate committee

Failure To Terminate Committee

26. Section 130.011(9) defines the limits of a candidate committee under Missouri's campaign finance, stating in part:

Candidate committee... 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[.]

27. Where Respondents was an unsuccessful candidate in the November 3, 2020, general election, where the committee had no debt, and where Respondents

failed to terminate by December 3, 2020, there is probable cause to believe Respondents violated § 130.011(9) giving this Commission the power to act as permitted under § 105.961.

Failure To Timely Report Change in Contact Information

28. “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.” § 130.021.7, RSMo.

29. The statement of organization shall contain “The name, mailing address and telephone number, if any, of the committee filing the statement of organization.” § 130.021.5(1), RSMo.

30. Where Respondents changed the committee’s address but failed to amend their Statement of Committee Organization within twenty days of the change, there is probable cause to believe Respondents violated § 130.021.7 giving this Commission the power to act as permitted under § 105.961.

Failure To Maintain an Official Depository Account

31. Pursuant to Section 130.021.4(1), RSMo, “every committee shall have 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.”

32. Where Respondents closed the committee’s official depository account, but did not terminate the committee, there is probable cause to believe Respondents violated § 130.021.4(1) giving this Commission the power to act as permitted under § 105.961.

COUNT II

Failure to accurately report beginning and ending money on hand

33. Reports shall state “[t]he amount of money, including cash on hand at the beginning of the reporting period [.]” § 130.041.1(2), RSMo.

34. Reports shall state “[t]he total amount of cash on hand as of the closing date of the reporting period covered, including amounts in depository accounts and in petty cash fund[.]” § 130.041.1(5), RSMo.

35. Where Respondents failed to accurately report the beginning and ending money on hand on two reports, there is probable cause to believe Respondents violated §§ 130.041.1(2) and 130.041.1(5), RSMo giving this Commission the power to act as permitted under § 105.961.

COUNT III

Failure to timely and accurately file campaign finance disclosure reports

36. Pursuant to Section 130.046.1, RSMo, all committees must file regular 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[.]

37. Pursuant to Section 130.050.3, RSMo,

The receipt of any late contribution or loan of more than two hundred fifty dollars by a candidate committee supporting a candidate for statewide office or by any other committee shall be reported to the appropriate officer no later than twenty-four hours after receipt. For purposes of this subsection the term "late contribution or loan" means a contribution or loan received after the closing date of the last disclosure report required to be filed before an election but received prior to the date of the election itself. The disclosure report of a late contribution may be made by any written means of communication, setting forth the name and address of the contributor or lender and the amount of the contribution or loan and need not contain the signatures and certification required for a full disclosure report described in section 130.041. A late contribution or loan shall be included in subsequent disclosure reports without regard to any special reports filed pursuant to this subsection.

38. Where Respondents failed to file eleven reports and filed one report late, there is probable cause to believe Respondents violated §§ 130.046 and 130.050, RSMo, giving this Commission the power to act as permitted under § 105.961.

COUNT IV

Failure to timely and accurately report contributions

39. All committees are required to report contributions for each reporting period, receipts for the 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.

40. Where Respondents failed to timely report one hundred thirty-five (135) contributions and thirty-one (31) miscellaneous receipts, inaccurately reported three (3) contributions, and accepted a contribution from a corporation, there is probable cause to believe Respondents violated § 130.041.1(3), RSMo and Mo Const. Art. VIII Sec. 23.3(3)(a), giving this Commission the power to act as permitted under § 105.961.

COUNT V

Failure to timely and accurately report expenditures

41. 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;

...

(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.

42. Where Respondents failed to timely report one hundred seventy-six (176) expenditures and inaccurately reported one expenditure, there is probable cause to believe Respondents violated § 130.041.1(4), RSMo, giving this Commission the power to act as permitted under § 105.961.

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 §§ 130.011(9), 130.021.4(1), 130.021.7, 130.041.1(2), 130.041.1(3), 130.041.1(4), 130.041.1(5), 130.046 and 130.050, RSMo and Mo Const. Art. VIII Sec. 23.3(3)(a).

The above-mentioned statutes consist of the following reporting errors: failure to timely amend the statement of committee organization to reflect a change, failure to accurately report beginning and ending money on hand, failure to timely and accurately file campaign finance disclosure reports, failure to timely and accurately report contributions and expenditures, and failure to terminate the committee. Petitioner did not find that Respondents misappropriated any campaign funds for personal use. After Petitioner completed its audit of Respondents' campaign finance records, Respondents filed all reports and terminated the committee on March 26, 2024.

Pursuant to § 105.961.4, the Missouri Ethics Commission hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130 and the Missouri Constitution.
2. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$58,297.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$5,829.00 within sixty

days after the date of the Consent Order, the remainder of the fee will be stayed. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.

3. Regardless of the stay in paragraph 2 above, if there is probable cause to believe that any Respondent commits 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 fees. The fee will be due immediately upon final adjudication finding that there was probable cause to believe that such Respondent has committed such a violation.
4. Respondents shall pay the \$10 fee for the late filing of the 2020 October Quarterly Report.
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 of 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:

RESPONDENTS PAUL BERRY III
PAUL BERRY III FOR ST. LOUIS
COUNTY


Paul Berry III

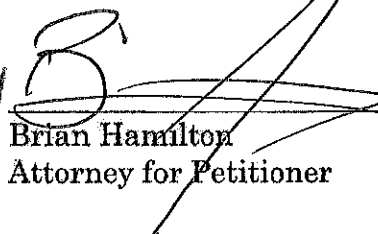
Date

11/19/2024

MISSOURI ETHICS COMMISSION


Stacey Heislen
Executive Director

11/19/2024
Date


Brian Hamilton
Attorney for Petitioner

11/19/24
Date

Attachment 1

| Contributor Name | Amount | Date | Report Not Showing Contribution |
|-----------------------------|---------------|-------------|--|
| Rose Malt | \$50.00 | 7/29/20 | 30 Day After Primary 8/4/20 |
| Mark Gamache | \$25.00 | 8/5/20 | 30 Day After Primary 8/4/20 |
| Brooke Koenig | \$50.00 | 8/12/20 | 30 Day After Primary 8/4/20 |
| Robert Watson | \$25.00 | 8/12/20 | 30 Day After Primary 8/4/20 |
| Matthew Walters | \$100.00 | 8/21/20 | 30 Day After Primary 8/4/20 |
| Linda Becker | \$25.00 | 8/25/20 | 30 Day After Primary 8/4/20 |
| Gregory McLennan | \$25.00 | 8/26/20 | 30 Day After Primary 8/4/20 |
| RP Roach & SL Roach | \$100.00 | 9/21/20 | October Quarterly 2020 |
| Tracy E. Simmons | \$100.00 | 9/21/20 | October Quarterly 2020 |
| Wesley Pitman | \$75.00 | 9/21/20 | October Quarterly 2020 |
| Gregory Divis, Jr. & Elaine | \$100.00 | 9/20/20 | October Quarterly 2020 |
| Danielle R. Virtel | \$50.00 | 9/21/20 | October Quarterly 2020 |
| Christine T. Hipp | \$50.00 | 10/2/20 | 8 Day Before General 11/3/20 |
| Madeline Valenti | \$50.00 | 10/1/20 | 8 Day Before General 11/3/20 |
| James Mathis | \$100.00 | 10/2/20 | 8 Day Before General 11/3/20 |
| Richard Clark | \$100.00 | 10/2/20 | 8 Day Before General 11/3/20 |
| Jim Goebel | \$25.00 | 10/1/20 | 8 Day Before General 11/3/20 |
| Julie Cartaya | \$50.00 | 10/2/20 | 8 Day Before General 11/3/20 |
| Jason Klemm | \$5.00 | 10/2/20 | 8 Day Before General 11/3/20 |
| Christine Hessel | \$50.00 | 10/2/20 | 8 Day Before General 11/3/20 |
| Brenda Kimberlin | \$50.00 | 10/3/20 | 8 Day Before General 11/3/20 |
| Sean McDonald | \$100.00 | 10/3/20 | 8 Day Before General 11/3/20 |
| Bill Bitting | \$100.00 | 10/6/20 | 8 Day Before General 11/3/20 |
| Debra Jansma | \$100.00 | 10/7/20 | 8 Day Before General 11/3/20 |
| John O'Shaughnessy | \$100.00 | 10/7/20 | 8 Day Before General 11/3/20 |
| Cynthia Somogye | \$25.00 | 10/8/20 | 8 Day Before General 11/3/20 |
| Samantha Stroup | \$25.00 | 10/9/20 | 8 Day Before General 11/3/20 |
| Stephen Slocum | \$100.00 | 10/13/20 | 8 Day Before General 11/3/20 |
| Janet Deidrick | \$50.00 | 10/13/20 | 8 Day Before General 11/3/20 |
| Brenda Mahr | \$100.00 | 10/12/20 | 8 Day Before General 11/3/20 |
| Carol Welsch | \$100.00 | 10/12/20 | 8 Day Before General 11/3/20 |
| Carol Woodard | \$25.00 | 10/10/20 | 8 Day Before General 11/3/20 |
| Aime Eickmann | \$100.00 | 10/10/20 | 8 Day Before General 11/3/20 |
| Kate Stratton | \$100.00 | 10/14/20 | 8 Day Before General 11/3/20 |
| Dawn Hrebec | \$50.00 | 10/15/20 | 8 Day Before General 11/3/20 |
| Dawn Wind | \$50.00 | 10/15/20 | 8 Day Before General 11/3/20 |
| Jennifer Mendonca | \$100.00 | 10/15/20 | 8 Day Before General 11/3/20 |
| Joe Patten | \$25.00 | 10/15/20 | 8 Day Before General 11/3/20 |
| Robert Caruso | \$100.00 | 10/15/20 | 8 Day Before General 11/3/20 |
| Jason Moore | \$100.00 | 10/15/20 | 8 Day Before General 11/3/20 |
| Lisa Schulte | \$50.00 | 10/15/20 | 8 Day Before General 11/3/20 |
| Donna Young | \$100.00 | 10/15/20 | 8 Day Before General 11/3/20 |
| Jeanne Grigsby | \$50.00 | 10/15/20 | 8 Day Before General 11/3/20 |
| Jessica Moran | \$25.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| John Krebs | \$25.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| Celia Donio | \$100.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| Marilee Sauer | \$50.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| Ann Lena | \$50.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| Andrew Hale | \$25.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| Derek Watson | \$100.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| Kathryn Lawson | \$25.00 | 10/16/20 | 8 Day Before General 11/3/20 |

| | | | |
|-------------------------|-------------------|----------|------------------------------|
| Cary Peel | \$25.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| Jason Klemm | \$5.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| Laura Custer | \$25.00 | 10/17/20 | 8 Day Before General 11/3/20 |
| Susan Tran | \$25.00 | 10/17/20 | 8 Day Before General 11/3/20 |
| Jenifer Clifton | \$25.00 | 10/17/20 | 8 Day Before General 11/3/20 |
| Kelly Hooker | \$25.00 | 10/17/20 | 8 Day Before General 11/3/20 |
| Melissa Pesce | \$100.00 | 10/17/20 | 8 Day Before General 11/3/20 |
| Julia Jansma | \$100.00 | 10/17/20 | 8 Day Before General 11/3/20 |
| Michelle Beczkala | \$50.00 | 10/17/20 | 8 Day Before General 11/3/20 |
| Timothy Gorline | \$50.00 | 10/18/20 | 8 Day Before General 11/3/20 |
| John Bubb | \$50.00 | 10/19/20 | 8 Day Before General 11/3/20 |
| Daniel Hamill | \$20.00 | 10/21/20 | 8 Day Before General 11/3/20 |
| Catherine Riedesel | \$25.00 | 10/21/20 | 8 Day Before General 11/3/20 |
| Chelle Dohrmann | \$50.00 | 10/21/20 | 8 Day Before General 11/3/20 |
| Emily Sarvies | \$25.00 | 10/21/20 | 8 Day Before General 11/3/20 |
| Molly Kennedy | \$50.00 | 10/21/20 | 8 Day Before General 11/3/20 |
| Jeanne Grigsby | \$50.00 | 10/21/20 | 8 Day Before General 11/3/20 |
| Joseph Tyldesley | \$100.00 | 10/22/20 | 8 Day Before General 11/3/20 |
| April Rombach | \$25.00 | 10/22/20 | 8 Day Before General 11/3/20 |
| Kim Elias | \$50.00 | 10/22/20 | 8 Day Before General 11/3/20 |
| Derek Watson | \$100.00 | 10/22/20 | 8 Day Before General 11/3/20 |
| Amber Mueller | \$25.00 | 10/22/20 | 8 Day Before General 11/3/20 |
| Joan Hoffmann | \$25.00 | 10/22/20 | 8 Day Before General 11/3/20 |
| Robert Zeitler | \$100.00 | 10/23/20 | 30 Day After General 11/3/20 |
| Alanna Ahern | \$25.00 | 10/26/20 | 30 Day After General 11/3/20 |
| Rekha Sharma | \$100.00 | 10/24/20 | 30 Day After General 11/3/20 |
| Bob Ferraris | \$50.00 | 10/24/20 | 30 Day After General 11/3/20 |
| Scott Spencer | \$25.00 | 10/24/20 | 30 Day After General 11/3/20 |
| Robert McMaster | \$100.00 | 10/21/20 | 30 Day After General 11/3/20 |
| Linda Bromeier | \$65.00 | 10/27/20 | 30 Day After General 11/3/20 |
| Julie Heyen | \$100.00 | 10/27/20 | 30 Day After General 11/3/20 |
| Cindy Hofstetter | \$50.00 | 10/28/20 | 30 Day After General 11/3/20 |
| Cindy Hofstetter | \$50.00 | 10/28/20 | 30 Day After General 11/3/20 |
| Judity Sofka | \$65.00 | 10/2/20 | 30 Day After General 11/3/20 |
| Marjorie Dahmer | \$100.00 | 9/9/20 | 30 Day After General 11/3/20 |
| John Bubb | \$50.00 | 10/29/20 | 30 Day After General 11/3/20 |
| Greg Boyd | \$25.00 | 10/29/20 | 30 Day After General 11/3/20 |
| Andrew Ostrowski | \$10.00 | 10/29/20 | 30 Day After General 11/3/20 |
| Kathy Dixon | \$25.00 | 10/31/20 | 30 Day After General 11/3/20 |
| Thomas Licata | \$25.00 | 11/1/20 | 30 Day After General 11/3/20 |
| Eric West | \$5.00 | 11/2/20 | 30 Day After General 11/3/20 |
| Brenda Jackson | \$20.00 | 10/25/20 | 30 Day After General 11/3/20 |
| Edward F. Poniewaz, Jr. | \$30.00 | 10/10/20 | 30 Day After General 11/3/20 |
| Martin Verplank | \$100.00 | 10/27/20 | 30 Day After General 11/3/20 |
| Total | \$5,400.00 | | |

Attachment 2

| Contributor Name | Amount | Date | Report Not Showing Contribution |
|--|--------------------|-------------|--|
| Tesson Ferry Township Republican Club | \$500.00 | 9/15/20 | October Quarterly 2020 |
| GCLA PAC | \$200.00 | 9/21/20 | October Quarterly 2020 |
| Republican Central Committee of St. Louis County | \$2,000.00 | 9/21/20 | October Quarterly 2020 |
| David P. & Rebecca J. Prange | \$200.00 | 9/22/20 | October Quarterly 2020 |
| Hank Air Management, LLC DBA Bobby's Place | \$300.00 | 9/22/20 | October Quarterly 2020 |
| Cash deposit | \$180.00 | 9/22/20 | October Quarterly 2020 |
| Stacie W. & Benjamin J. Brasseur | \$250.00 | 9/22/20 | October Quarterly 2020 |
| Roderick S & Stacy E Washington | \$200.00 | 10/5/20 | 8 Day Before General 11/3/20 |
| Deborah A & Jeffrey R Hawley | \$200.00 | 10/5/20 | 8 Day Before General 11/3/20 |
| Patrick & Paul Coughlin | \$250.00 | 10/5/20 | 8 Day Before General 11/3/20 |
| Scg Ckg | \$250.00 | 10/5/20 | 8 Day Before General 11/3/20 |
| JC Stewart | \$250.00 | 10/5/20 | 8 Day Before General 11/3/20 |
| Deborah A. Lessor | \$500.00 | 10/5/20 | 8 Day Before General 11/3/20 |
| Ryan T. & Jennifer A. Barker | \$500.00 | 10/5/20 | 8 Day Before General 11/3/20 |
| Randy & Sarah Larson | \$500.00 | 10/5/20 | 8 Day Before General 11/3/20 |
| Constance Lohr | \$1,000.00 | 10/5/20 | 8 Day Before General 11/3/20 |
| Linda A. Tackes | \$1,000.00 | 10/5/20 | 8 Day Before General 11/3/20 |
| William Pride | \$200.00 | 10/6/20 | 8 Day Before General 11/3/20 |
| Jeanne Champer | \$2,600.00 | 10/6/20 | 8 Day Before General 11/3/20 |
| Nancy Weaver | \$500.00 | 10/7/20 | 8 Day Before General 11/3/20 |
| Nancy Weaver | \$500.00 | 10/7/20 | 8 Day Before General 11/3/20 |
| Garrett Jensen | \$250.00 | 10/8/20 | 8 Day Before General 11/3/20 |
| Martin Raineri | \$250.00 | 10/14/20 | 8 Day Before General 11/3/20 |
| Kevin J. McCann, LLC | \$300.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| Fashion Connection Dress Boutique, Inc. | \$500.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| Billy R. Connely & Catherine N. Shaw-Connely | \$1,000.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| Nikki Mills | \$1,000.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| Brant Baldanza | \$500.00 | 10/19/20 | 8 Day Before General 11/3/20 |
| Bev Ehlen | \$150.00 | 10/21/20 | 8 Day Before General 11/3/20 |
| G Cusumano | \$200.00 | 10/21/20 | 8 Day Before General 11/3/20 |
| Drysdale Pest Control | \$300.00 | 10/23/20 | 8 Day Before General 11/3/20 |
| Jerome Jacobsmeyer | \$250.00 | 10/23/20 | 8 Day Before General 11/3/20 |
| Sean McDonald | \$250.00 | 10/23/20 | 8 Day Before General 11/3/20 |
| Michael J. Esser Revoc Trust | \$500.00 | 10/29/20 | 30 Day After General 11/3/20 |
| James Matush | \$500.00 | 10/29/20 | 30 Day After General 11/3/20 |
| Troy Slaten, LLC | \$200.00 | 11/2/20 | 30 Day After General 11/3/20 |
| Thomas A. Miller | \$250.00 | 11/2/20 | 30 Day After General 11/3/20 |
| STLHARP, LLC | \$250.00 | 11/2/20 | 30 Day After General 11/3/20 |
| John F. Peters | \$300.00 | 11/16/20 | 30 Day After General 11/3/20 |
| Printing Industries PAC | \$2,500.00 | 11/16/20 | 30 Day After General 11/3/20 |
| Total | \$21,530.00 | | |

Attachment 3

| Expenditure Name | Purpose | Amount | Date | Report Not Showing Expenditure |
|------------------------------|--------------------|---------------|-------------|---------------------------------------|
| Harland Clarke | Checks | \$29.75 | 7/22/20 | 8 Day Before Primary 8/4/20 |
| WinRed | Processing fees | \$7.47 | N/A | 8 Day Before Primary 8/4/20 |
| Central Bank of St. Louis | Return item charge | \$38.00 | 8/5/20 | 30 Day After Primary 8/4/20 |
| Central Bank of St. Louis | Return item charge | \$38.00 | 8/10/20 | 30 Day After Primary 8/4/20 |
| WinRed | Processing fees | \$13.50 | N/A | 30 Day After Primary 8/4/20 |
| WinRed | Processing fees | \$822.55 | N/A | October Quarterly 2020 |
| Amzn Mktp US*MK | Unknown | \$54.99 | 10/5/20 | 8 Day Before General 11/3/20 |
| Central Bank of St. Louis | Service charge | \$8.50 | 10/9/20 | 8 Day Before General 11/3/20 |
| Dem & Family Transport | Transportation | \$75.00 | 10/13/20 | 8 Day Before General 11/3/20 |
| Chevys Olivette MO | Food & beverage | \$84.46 | 10/13/20 | 8 Day Before General 11/3/20 |
| Lemay Chamber of Commerce | Unknown | \$36.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| Zoom.com | Meetings | \$14.99 | 10/19/20 | 8 Day Before General 11/3/20 |
| Quik Trip | Gas | \$40.00 | 10/19/20 | 8 Day Before General 11/3/20 |
| Mason Signs | Signs | \$100.00 | 10/12/20 | 8 Day Before General 11/3/20 |
| Chevys | Food & beverage | \$76.00 | 10/20/20 | 8 Day Before General 11/3/20 |
| Chevys | Food & beverage | \$93.46 | 10/22/20 | 8 Day Before General 11/3/20 |
| WinRed | Processing fees | \$397.09 | N/A | 8 Day Before General 11/3/20 |
| Quik Trip | Gas | \$10.94 | 10/23/20 | 30 Day After General 11/3/20 |
| Amazon.com | Unknown | \$25.74 | 10/23/20 | 30 Day After General 11/3/20 |
| Office Depot | Unknown | \$30.72 | 10/23/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$37.77 | 10/23/20 | 30 Day After General 11/3/20 |
| Quik Trip | Gas | \$48.43 | 10/26/20 | 30 Day After General 11/3/20 |
| Phillips 66 | Gas | \$7.29 | 11/2/20 | 30 Day After General 11/3/20 |
| City of Maryland Heights, MO | Unknown | \$40.00 | 11/2/20 | 30 Day After General 11/3/20 |
| Drakes Place | Food & beverage | \$60.00 | 11/2/20 | 30 Day After General 11/3/20 |
| Save a lot | Unknown | \$76.53 | 11/2/20 | 30 Day After General 11/3/20 |
| Applebees | Food & beverage | \$38.00 | 11/4/20 | 30 Day After General 11/3/20 |
| Ferguson Brewing | Ferguson Brewing | \$42.00 | 11/5/20 | 30 Day After General 11/3/20 |
| Imos Pizza | Food & beverage | \$67.00 | 11/6/20 | 30 Day After General 11/3/20 |
| Quik Trip | Gas | \$67.48 | 11/6/20 | 30 Day After General 11/3/20 |
| Quik Trip | Gas | \$22.51 | 11/9/20 | 30 Day After General 11/3/20 |
| BP St. Louis, MO | BP St. Louis, MO | \$30.00 | 11/9/20 | 30 Day After General 11/3/20 |
| Central Bank of St. Louis | Service charge | \$18.35 | 11/9/20 | 30 Day After General 11/3/20 |
| Royal Chinese | Food & beverage | \$20.10 | 11/10/20 | 30 Day After General 11/3/20 |
| Imos Pizza | Food & beverage | \$51.00 | 11/10/20 | 30 Day After General 11/3/20 |
| KFC St. Louis MO | Food & beverage | \$32.08 | 11/12/20 | 30 Day After General 11/3/20 |
| Fedex Office | Printing/mailing | \$38.23 | 11/12/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$9.13 | 11/13/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$3.51 | 11/16/20 | 30 Day After General 11/3/20 |
| Sugarfire | Food & beverage | \$20.35 | 11/16/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$26.95 | 11/16/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$33.40 | 11/16/20 | 30 Day After General 11/3/20 |
| Zoom.com | Meetings | \$14.99 | 11/17/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$12.97 | 11/17/20 | 30 Day After General 11/3/20 |
| UPS store | Printing/mailing | \$27.29 | 11/17/20 | 30 Day After General 11/3/20 |
| Quik Trip | Printing/mailing | \$60.00 | 11/17/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$69.67 | 11/17/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$75.59 | 11/17/20 | 30 Day After General 11/3/20 |
| UPS store | Printing/mailing | \$5.00 | 11/18/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$7.45 | 11/18/20 | 30 Day After General 11/3/20 |
| Quik Trip | Gas | \$31.12 | 11/18/20 | 30 Day After General 11/3/20 |

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|----------------------------------|---------------------|---------|----------|------------------------------|
| USPS PO | Mailing | \$23.25 | 11/19/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$2.17 | 11/20/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$10.84 | 11/20/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$15.80 | 11/20/20 | 30 Day After General 11/3/20 |
| Clayton Street Clayton, MO | Unknown | \$1.50 | 11/23/20 | 30 Day After General 11/3/20 |
| Clayton Street Clayton, MO | Unknown | \$1.50 | 11/23/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$5.43 | 11/23/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$12.23 | 11/23/20 | 30 Day After General 11/3/20 |
| Herbies | Food & beverage | \$21.00 | 11/23/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$29.72 | 11/23/20 | 30 Day After General 11/3/20 |
| "Eastern Mis[...]" St. Louis, MO | Unknown | \$40.00 | 11/23/20 | 30 Day After General 11/3/20 |
| Quik Trip | Gas | \$65.00 | 11/25/20 | 30 Day After General 11/3/20 |
| Imos Pizza | Food & beverage | \$72.00 | 11/27/20 | 30 Day After General 11/3/20 |
| WinRed | Processing fees | \$50.59 | N/A | 30 Day After General 11/3/20 |
| Raising Cane's | Food & beverage | \$42.39 | 11/30/20 | April Quarterly 2021 |
| Imos Pizza | Food & beverage | \$85.00 | 12/2/20 | April Quarterly 2021 |
| Fedex Office | Printing/mailing | \$9.20 | 12/4/20 | April Quarterly 2021 |
| Quik Trip | Gas | \$55.00 | 12/4/20 | April Quarterly 2021 |
| White Castle | Food & beverage | \$40.09 | 12/7/20 | April Quarterly 2021 |
| Fedex Office | Printing/mailing | \$14.60 | 12/8/20 | April Quarterly 2021 |
| Buffalo Wild Wings | Food & beverage | \$25.00 | 12/8/20 | April Quarterly 2021 |
| Imos Pizza | Food & beverage | \$75.00 | 12/9/20 | April Quarterly 2021 |
| Central Bank of St. Louis | Service charge | \$8.00 | 12/9/20 | April Quarterly 2021 |
| Fedex Office | Printing/mailing | \$18.80 | 12/10/20 | April Quarterly 2021 |
| Michaels Stores | Unknown | \$56.95 | 12/10/20 | April Quarterly 2021 |
| Quik Trip | Gas | \$59.00 | 12/10/20 | April Quarterly 2021 |
| Quik Trip | Gas | \$40.00 | 12/11/20 | April Quarterly 2021 |
| Zoom.com | Meetings | \$14.99 | 12/17/20 | April Quarterly 2021 |
| UPS store | Printing/mailing | \$10.00 | 12/17/20 | April Quarterly 2021 |
| FedEx Office | Printing/mailing | \$12.87 | 12/17/20 | April Quarterly 2021 |
| FedEx Office | Printing/mailing | \$32.22 | 12/17/20 | April Quarterly 2021 |
| FedEx Office | Printing/mailing | \$2.73 | 12/18/20 | April Quarterly 2021 |
| UPS store | Printing/mailing | \$10.00 | 12/18/20 | April Quarterly 2021 |
| Quik Trip | Gas | \$35.00 | 12/18/20 | April Quarterly 2021 |
| FedEx Office | Printing/mailing | \$25.17 | 12/21/20 | April Quarterly 2021 |
| Quik Trip | Gas | \$38.00 | 12/21/20 | April Quarterly 2021 |
| Imos Pizza | Food & beverage | \$73.00 | 12/21/20 | April Quarterly 2021 |
| Central Bank of St. Louis | Service charge | \$3.00 | 1/11/21 | April Quarterly 2021 |
| Zoom.com | Meetings | \$14.99 | 1/19/21 | April Quarterly 2021 |
| Central Bank of St. Louis | Service charge | \$3.00 | 2/9/21 | April Quarterly 2021 |
| Zoom.com | Meetings | \$14.99 | 2/17/21 | April Quarterly 2021 |
| Central Bank of St. Louis | Service charge | \$3.00 | 3/9/21 | April Quarterly 2021 |
| Zoom.com | Meetings | \$14.99 | 3/17/21 | April Quarterly 2021 |
| Central Bank of St. Louis | Service charge | \$3.00 | 4/9/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$18.00 | 4/19/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 4/20/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 4/21/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 4/22/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 4/23/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$18.00 | 4/26/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 4/27/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 4/28/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 4/29/21 | July Quarterly 2021 |

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|---------------------------|---------------------|-------------------|---------|---------------------|
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 4/30/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$18.00 | 5/3/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 5/4/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 5/5/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 5/6/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 5/7/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$3.15 | 5/10/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$18.00 | 5/10/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 5/11/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 5/12/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 5/13/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 5/14/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$18.00 | 5/17/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 5/18/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 5/19/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 5/20/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$6.00 | 5/21/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Daily overdraft fee | \$18.00 | 5/24/21 | July Quarterly 2021 |
| Central Bank of St. Louis | Service charge | \$3.87 | 6/9/21 | July Quarterly 2021 |
| Total | | \$4,517.38 | | |

Attachment 4

| Expenditure Name | Purpose | Amount | Date | Report Not Showing Expenditure |
|------------------------------|-------------------|---------------|-------------|---------------------------------------|
| Facebook | Advertising | \$104.97 | 10/2/20 | 8 Day Before General 11/3/20 |
| EZPOLITIX | Consulting | \$350.00 | 10/5/20 | 8 Day Before General 11/3/20 |
| EZPOLITIX | Consulting | \$2,000.00 | 10/6/20 | 8 Day Before General 11/3/20 |
| Hummert Graphics | Printing | \$2,248.42 | 10/2/20 | 8 Day Before General 11/3/20 |
| Mason Signs | Signs | \$735.00 | 10/1/20 | 8 Day Before General 11/3/20 |
| Facebook | Advertising | \$175.00 | 10/13/20 | 8 Day Before General 11/3/20 |
| Dem & Family Transport | Transportation | \$250.00 | 10/13/20 | 8 Day Before General 11/3/20 |
| Gregory Cody | Sign installation | \$150.00 | 10/12/20 | 8 Day Before General 11/3/20 |
| Jahi Esteridge | Sign installation | \$150.00 | 10/12/20 | 8 Day Before General 11/3/20 |
| Facebook | Advertising | \$250.00 | 10/16/20 | 8 Day Before General 11/3/20 |
| USPS | Mailing | \$144.80 | 10/16/20 | 8 Day Before General 11/3/20 |
| Facebook | Advertising | \$250.00 | 10/19/20 | 8 Day Before General 11/3/20 |
| MBC | Late fee | \$122.58 | 10/19/20 | 8 Day Before General 11/3/20 |
| Home Depot | Unknown | \$439.55 | 10/19/20 | 8 Day Before General 11/3/20 |
| Real STL Media | Media services | \$1,000.00 | 10/3/20 | 8 Day Before General 11/3/20 |
| Omar O'Hara | Media services | \$1,000.00 | 10/18/20 | 8 Day Before General 11/3/20 |
| Mason Signs | Printing | \$1,500.00 | 10/18/20 | 8 Day Before General 11/3/20 |
| Mason Signs | Printing | \$1,470.00 | 10/19/20 | 8 Day Before General 11/3/20 |
| Dem & Family Transport | Transportation | \$250.00 | 10/21/20 | 8 Day Before General 11/3/20 |
| Target | Unknown | \$102.89 | 10/22/20 | 8 Day Before General 11/3/20 |
| Dem & Family Transport | Transportation | \$250.00 | 10/22/20 | 8 Day Before General 11/3/20 |
| Omar O'Hara | Media services | \$1,000.00 | 10/25/20 | 30 Day After General 11/3/20 |
| Omar O'Hara | Media services | \$500.00 | 10/23/20 | 30 Day After General 11/3/20 |
| Facebook | Advertising | \$400.00 | 10/26/20 | 30 Day After General 11/3/20 |
| Sq *Show Me Air gosq.com | Unknown | \$300.00 | 10/26/20 | 30 Day After General 11/3/20 |
| Google | Advertising | \$350.00 | 10/26/20 | 30 Day After General 11/3/20 |
| Google | Advertising | \$500.00 | 10/29/20 | 30 Day After General 11/3/20 |
| Facebook | Advertising | \$600.00 | 10/30/20 | 30 Day After General 11/3/20 |
| Sq *Show Me Air gosq.com | Unknown | \$150.00 | 10/30/20 | 30 Day After General 11/3/20 |
| Target | Unknown | \$152.39 | 10/30/20 | 30 Day After General 11/3/20 |
| Target | Unknown | \$455.10 | 10/30/20 | 30 Day After General 11/3/20 |
| Omar O'Hara | Media services | \$700.00 | 11/7/20 | 30 Day After General 11/3/20 |
| Omar O'Hara | Media services | \$300.00 | 11/12/20 | 30 Day After General 11/3/20 |
| Omar O'Hara | Media services | \$500.00 | 11/14/20 | 30 Day After General 11/3/20 |
| Facebook | Advertising | \$657.37 | 11/2/20 | 30 Day After General 11/3/20 |
| Quik Trip | Gas | \$117.27 | 11/2/20 | 30 Day After General 11/3/20 |
| Dem & Family Transport | Transportation | \$200.00 | 11/2/20 | 30 Day After General 11/3/20 |
| Dem & Family Transport | Transportation | \$400.00 | 11/2/20 | 30 Day After General 11/3/20 |
| Google | Advertising | \$500.00 | 11/2/20 | 30 Day After General 11/3/20 |
| Google | Advertising | \$500.00 | 11/2/20 | 30 Day After General 11/3/20 |
| Google | Advertising | \$500.00 | 11/2/20 | 30 Day After General 11/3/20 |
| Dem & Family Transport | Transportation | \$300.00 | 11/3/20 | 30 Day After General 11/3/20 |
| Corporate Transportation | Transportation | \$160.00 | 11/4/20 | 30 Day After General 11/3/20 |
| Corporate Transportation | Transportation | \$200.00 | 11/5/20 | 30 Day After General 11/3/20 |
| St. Louis County Clayton, MO | Unknown | \$105.50 | 11/16/20 | 30 Day After General 11/3/20 |
| UPS store | Printing/mailing | \$145.65 | 11/16/20 | 30 Day After General 11/3/20 |
| Dem & Family Transport | Transportation | \$240.00 | 11/16/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$123.23 | 11/17/20 | 30 Day After General 11/3/20 |
| FedEx Office | Printing/mailing | \$101.06 | 11/18/20 | 30 Day After General 11/3/20 |

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|-----------------------------------|--------------|--------------------|----------|------------------------------|
| Courts/USDC-MO St. Louis, MO | Unknown | \$400.00 | 11/18/20 | 30 Day After General 11/3/20 |
| St. Louis County Circuit Clerk | 20SL-CC06090 | \$105.50 | 11/14/20 | 30 Day After General 11/3/20 |
| Facebook | Advertising | \$493.47 | 12/2/20 | April Quarterly 2021 |
| Google | Advertising | \$353.69 | 12/3/20 | April Quarterly 2021 |
| Total | | \$24,453.44 | | |

Filed

NOV 20 2024

Missouri Ethics
Commission

BEFORE THE
MISSOURI ETHICS COMMISSION

MISSOURI ETHICS)
 COMMISSION,)
)
 Petitioner,)
)
 v.)
)
 PAUL BERRY III, Candidate,)
)
 and)
)
 PAUL BERRY III FOR ST. LOUIS)
 COUNTY, Candidate Committee,)
)
 Respondents.)

Case No. 22-0005-A

CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.011(9), 130.021.4(1), 130.021.7, 130.041.1(2), 130.041.1(3), 130.041.1(4), 130.041.1(5), 130.046 and 130.050, RSMo and Mo Const. Art. VIII Sec. 23.3(3)(a).

The above-mentioned statutes consist of the following reporting errors: failure to timely amend the statement of committee organization to reflect a change, failure to accurately report beginning and ending money on hand, failure to timely and accurately file campaign finance disclosure reports, failure to timely and accurately report contributions and expenditures, and failure to terminate the committee. Petitioner did not find that Respondents misappropriated any campaign funds for personal use. After Petitioner completed its audit of Respondents' campaign finance

records, Respondents filed all reports and terminated the committee on March 26, 2024.

Pursuant to § 105.961.4, the Missouri Ethics Commission hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130 and the Missouri Constitution.
2. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$58,297.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$5,829.00 within sixty days after the date of the Consent Order, the remainder of the fee will be stayed. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.
3. Regardless of the stay in paragraph 2 above, if there is probable cause to believe that any Respondent commits 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 fees. The fee will be due immediately upon final adjudication finding that there was probable cause to believe that such Respondent has committed such a violation.
4. Respondents shall pay the \$10 fee for the late filing of the 2020 October Quarterly Report.
5. Respondents shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 20th day of November, 2024



Robin Wheeler Sanders, Chair
Missouri Ethics Commission