

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed
DEC 18 2024
Missouri Ethics
Commission

MISSOURI ETHICS)	
COMMISSION,)	
)	
Petitioner,)	
)	
v.)	
)	
TRUTH IN POLITICS,)	
Nonprofit Organization,)	Case No. 22-0039-I
)	
CURTIS JARED,)	
President,)	
)	
GEORGE HUSTED,)	
Secretary & Treasurer,)	
)	
LEE FRALEY)	
Director,)	
)	
ROYCE REDING,)	
Director,)	
)	
SAM CLIFTON)	
Director,)	
)	
Respondents.)	

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

The Missouri Ethics Commission (“MEC”), together with Truth in Politics, Curtis Jared, George Husted, Lee Fraley, Royce Reding, and Sam Clifton (“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. Truth in Politics registered with the Missouri Secretary of State as a nonprofit corporation on July 31, 2020.
2. At all relevant times, Curtis Jared is listed as President of Truth in Politics on its filing as a nonprofit organization with the Missouri Secretary of State.
3. At all relevant times, George Husted is listed as Secretary and Treasurer of Truth in Politics on its filing as a nonprofit organization with the Missouri Secretary of State.
4. At all relevant times, Lee Fraley is listed as Director of Truth in Politics on its filing as a nonprofit organization with the Missouri Secretary of State.
5. At all relevant times, Royce Reding is listed as Director of Truth in Politics on its filing as a nonprofit organization with the Missouri Secretary of State.
6. At all relevant times, Sam Clifton is listed as Director of Truth in Politics on its filing as a nonprofit organization with the Missouri Secretary of State.
7. Pursuant to § 105.961 the Commission's staff investigated a complaint and reported the investigation findings to the Commission.

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

Count I – Failure to Register as a Committee

9. Starting on March 11, 2021, Respondents solicited contributions and made expenditures with the express purpose of using such resources to influence the outcome of elections, including the 2021 & 2022 April Municipal Elections.

10. Within that same week, over \$500 was accepted in contributions from multiple donors, by at least March 11, 2021. Attachment 1.

Count II – Failure to Report Contributions

11. From at least March 11, 2021, through March 1, 2023, Respondents accepted contributions aggregating \$100 or less, totaling \$580, without reporting said contributions to the Commission.

12. From at least March 11, 2021, through March 1, 2023, Respondents accepted contributions totaling \$ 127,040.66, without reporting said contributions to the Commission. Attachment 1.

Count III – Failure to Report Expenditures

13. From at least March 11, 2021, through March 1, 2023, Respondents failed to report \$ 119,826.25 in expenditures in support of candidates for office. Attachment 1.

Count IV – Failure to File Reports

Date Triggered Reports Not Filed

14. Respondent's took contributions and made expenditures in support of candidates in both the 2021 and 2022 April Municipal Elections.

15. Respondents failed to file twelve reports required under §§ 130.041 & 130.046, they are detailed here in Figure B and incorporated by reference:

FIGURE B	
Report	Due Date
8 Day Before April '21 Municipal Election	3/29/2021
April '21 Quarterly Report	4/15/2021
30 Day After April '21 Municipal Election	5/6/2021
July '21 Quarterly Report	7/15/2021
October '21 Quarterly Report	10/15/2021
January '22 Quarterly Report	1/18/2022
40 Day Before April '22 Municipal Election Report	2/24/2022
8 Day Before April '22 Municipal Election Report	3/28/2022
April '22 Quarterly Report	4/15/2022
30 Day After April '22 Municipal Election Report	5/5/2022
July '22 Quarterly Report	7/15/2022
October '22 Quarterly Report	10/17/2022

24 Hour Contribution Report

16. Respondents received three (3) contributions within the time period requiring a 24-Hour Report and failed to file said report. The contributions are detailed below in Figure C and incorporated here by reference:

FIGURE C - Late Contributions		
Date of Contribution	Name	Amount
3/29/2021	Sam Coryell	\$2,000
3/29/2021	Mavis Busiek	\$1,000
4/1/2022	Loren Cook II	\$3,000

Late Expenditure Report

17. On March 8, 2022, Respondents made an expenditure of \$4,200 to The Political Firm, within the window for a late disclosure report filing for the April 2022 Municipal Election and failed to file such report.

48 Hour Contribution Report

18. Respondents accepted contributions in excess of \$5,000 on four (4) occasions, without filing the requisite report, a detailed listing of these contributions is included here as Figure D, and incorporated by reference:

FIGURE D - 48 Hour Report Contributions		
Date of Contribution	Name	Amount
3/14/2021	Robert Neville	\$5,500
4/21/2021	Rapid Roberts	\$5,500
4/21/2021	Humana	\$18,000
5/14/2021	Centene Management	\$18,000

CONCLUSIONS OF LAW

Count I – Failure to Register as a Committee

19. Section 130.011(7) defines a committee as:

a person or any combination of persons, who accepts contributions or makes expenditures for the primary or incidental purpose of influencing or attempting to influence the action of voters for or against the... qualification, passage or defeat of any ballot measure.

20. The provision defining a committee goes on to set threshold limits before activity becomes a committee, § 130.011(7)(a) excludes the following from the definition of committee:

a. A person or combination of persons, if neither the aggregate of expenditures made nor the aggregate of contributions received during a calendar year exceeds five hundred dollars and if no single contributor has contributed more than two hundred fifty dollars of such aggregate contributions[.]

21. 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[.]

22. 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[.]

23. Upon meeting the definition of a committee, §130.021(5) requires formation to be undertaken, stating, in relevant part:

any person or organization or group of persons which is a committee by virtue of the definitions of committee in section 130.011...shall file a statement of organization with the appropriate officer within twenty days after the person or organization becomes a committee but no later than the date for filing the first report required pursuant to the provisions of section 130.046.

24. Where Respondents accepted contributions in excess of \$ 500 with the intention of supporting candidates for office, and where they failed to register a committee within the time limits prescribed by § 130.021, there is probable cause to believe they violated §130.021.5, empowering this Commission to act, as permitted by law.

Count II – Failure to Report Contributions

25. Section 130.041.1(3)(e) requires 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[.]

26. Further, § 130.021.4(1) details the requirements on use of the fund depository account for such contributions, stating, in relevant part:

All contributions which the committee receives in money, checks and other negotiable instruments shall be deposited in a committee's official depository account. 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.

27. Where Respondents failed to report \$ 127,620.66 in contributions, there is probable cause to believe Respondents violated §§ 130.021 & 130.041, giving this Commission the power to act, as provided by law.

Count III – Failure to Report Expenditures

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

(3) 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[.]

29. Further, § 130.021.4(1) details the requirements on use of the fund depository account to make said expenditures, stating, in relevant part:

All contributions which the committee receives in money, checks and other negotiable instruments shall be deposited in a committee's official depository account. 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.

30. Where Respondents failed to report \$ 119,826.25 in expenditures, there is probable cause to believe they violated §§ 130.021 & 130.041, giving this Commission the power to act, as prescribed by law.

Count IV – Failure to File Reports

31. 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.

32. 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:

(2) 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;

(3) 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

(4) 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[.]

33. Section 130.046.3 further requires continuing committees to:

[S]ubmit additional reports if it makes aggregate expenditures, other than contributions to a committee, of five hundred dollars or more, within the reporting period at the following times 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;
- (2) Not later than twenty-four hours after aggregate expenditures of two hundred fifty dollars or more are made after the twelfth day before the election; and
- (3) Not later than the thirtieth day after an election for a period closing on the twenty-fifth day after the election.

34. Section 130.050.3 details when certain contributions must be reported with twenty-four hours:

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[.]

35. Section 130.044.1 states, in relevant part:

All individuals and committees required to file disclosure reports under section 130.041 shall electronically report any contribution by any single contributor which exceeds five thousand dollars to the Missouri ethics commission within forty-eight hours of receiving the contribution[.]

36. Where Respondents failed to file at least twelve (12) regular reports, three (3) 24 Hour Reports, one (1) Late Expenditures Report, and four (4) 48 Hour Reports required by §§ 130.021, 130.041, 130.044, 130.046.3, and 130.050, there is probable cause to believe said statutes were violated, giving this Commission the power to act, as prescribed 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, 130.041, 130.044, 130.046.3, and 130.050 RSMo, and pursuant to § 105.961.4, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130.
2. Respondents are assessed a fee in the amount of \$ 249,446, pursuant to § 105.961.4(6), due by check or money order and payable to the Missouri Ethics Commission within sixty (60) days of the issuance of this Order.
3. If Respondents pay \$ 20,000 of the assessed fee within forty-five (45) days of the issuance of this Order, the remainder of the fee will be stayed for a period of two years. If Respondents do not commit any further violations of Chapter 130, the remainder of the fee shall be dissolved. If there is probable cause to believe any Respondent committed any further violations of the campaign finance laws under Chapter 130 within the two-year period, the remainder of the fee shall be due immediately upon such a finding.
4. 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 TRUTH IN POLITICS

Signed by: Curtis Jared 12/17/2024
Date
Curtis Jared
President

Signed by: George Husted 12/5/2024
Date
George Husted
Secretary & Treasurer

DocuSigned by: Lee Fraley 12/17/2024
Date
Lee Fraley
Director

DocuSigned by: Royce Reding 12/17/2024
Date
Royce Reding
Director

Signed by: Sam Clifton 12/17/2024
Date
Sam Clifton
Director

ATTORNEY FOR RESPONDENTS

Signed by: Lucinda Luetkemeyer 12/2/2024
Date
Lucinda H. Luetkemeyer
Graves Garrett LLC

MISSOURI ETHICS COMMISSION

Stacey Heislen 12/18/2024
Date
Stacey Heislen
Executive Director

Brian Hamilton 12/18/24
Date
Brian Hamilton
Attorney for Petitioner

Date	Description	Contributions	Expenditures
3/8/2021	Carson Buckman	100.00	
3/8/2021	Nathan Adams	600.00	
3/9/2021	Candice Ehase	100.00	
	Anedot fees		33.20
3/11/2021	Nicholas Austin	2,500.00	
3/11/2021	Penn Enterprises, Inc.	1,500.00	
3/11/2021	Gordon Kinne	500.00	
	Anedot fees		20.30
3/9/2021	311 S Hampton LLC	1,500.00	
3/12/2021	Royce Reding	100.00	
3/12/2021	Joe Passanise	100.00	
	Anedot fees		8.60
3/14/2021	Tyler Creach	100.00	
3/14/2021	Kandace Prewitt	100.00	
	Anedot fees		8.60
3/11/2021	Fraley Masonry	2,000.00	
3/14/2021	Ronald Neville	5,500.00	
	Curtis Jared	250.00	
	Anedot fees		10.30
3/1/2021	Jeffrey Caison	5,000.00	
3/22/2021	Axiom Strategies		7,500.00
3/22/2021	Clout Public Affairs		1,000.00
3/22/2021	HenryAlan		632.65
3/29/2021	Sam Coryell	2,000.00	
	Anedot fees		80.30
3/29/2021	Mavis Busiek	1,000.00	
4/1/2021	Caleb Arthur	100.00	
4/1/2021	Sam Clifton	100.00	
4/1/2021	John Ruder	100.00	
	Anedot Fees		12.90
4/7/2021	Bryan Magers	5,000.00	
4/5/2021	Brent Brown	250.00	
4/6/2021	David Havens	1,200.00	
	Anedot fees		58.60
4/8/2021	Nathan Adams	100.00	
4/8/2021	Carson Buckman	100.00	
	Anedot fees		8.60
4/9/2021	Candice Ehase	100.00	
	Anedot fees		4.30
3/31/2021	Jared Management LLC		664.34

4/12/2021	Royce Reding	100.00	
4/12/2021	Joe Passanise	100.00	
	Anedot fees		8.60
4/14/2021	Tyler Creach	100.00	
4/14/2021	Kandace Prewitt	100.00	
	Anedot fees		8.60
4/12/2021	Jared Management LLC		238.34
4/22/2021	Curtis Jared	250.00	
	Anedot Fees		10.30
4/19/2021	Axiom Strategies		2,998.97
4/19/2021	HenryAlan		200.00
4/19/2021	Remington Research Group		6,974.88
4/19/2021	Vanguard Field Strategies		34,926.00
4/21/2021	Rapid Roberts	5,500.00	
4/21/2021	Humana	18,000.00	
5/1/2021	Caleb Arthur	100.00	
5/1/2021	Sam Clifton	100.00	
5/2/2021	John Ruder	100.00	
	Anedot fees		12.90
5/5/2021	Brent Brown	250.00	
	Anedot fees		10.30
5/4/2021	HenryAlan		200.00
5/4/2021	Axiom Strategies		6,000.00
5/8/2021	Carson Buckman	100.00	
5/8/2021	Nathan Adams	100.00	
	Anedot fees		8.60
5/9/2021	Candice Ehasz	100.00	
	Anedot Fees		4.30
4/26/2021	Brent Davis	5,000.00	
	Unknown	1,000.00	
5/4/2021	WPAI		5,000.00
5/12/2021	Royce Reding	100.00	
5/12/2021	Joe Passanise	100.00	
	Anedot Fees		8.60
	Centene Management	18,000.00	
5/14/2021	Tyler Creach	100.00	
5/14/2021	Kandace Prewitt	100.00	
	Anedot fees		8.60
5/22/2021	Curtis Jared	250.00	
	Anedot Fees		10.30
	Anedot fees		2.00

6/1/2021	Sam Clifton	100.00	
6/1/2021	Caleb Arthur	100.00	
	Anedot fees		8.60
6/2/2021	John Ruder	100.00	
	Anedot Fees		4.30
5/1/2021	Kendall Qualls		2,925.00
6/5/2021	Brent Brown	250.00	
	Anedot Fees		10.30
6/1/2021	Incorp Services, Inc.		99.00
6/8/2021	Nathan Adams	100.00	
6/8/2021	Carson Buckman	100.00	
6/9/2021	Candice Ehasz	100.00	
	Anedot fees		12.90
6/12/2021	Joe Passanise	100.00	
6/12/2021	Royce Reding	100.00	
	Anedot fees		8.60
6/10/2021	The Prosper Group		1,500.00
6/14/2021	Tyler Creach	100.00	
6/14/2021	Kandace Prewitt	100.00	
	Anedot Fees		8.60
6/18/2021	Nelson Knapp	150.00	
	Anedot Fees		6.30
6/22/2021	Curtis Jared	250.00	
	Anedot Fees		11.00
	Anedot Fees		4.30
7/1/2021	Caleb Arthur	100.00	
7/1/2021	Sam Clifton	100.00	
	Anedot fees		8.60
7/2/2021	John Ruder	100.00	
	Anedot Fees		4.30
7/5/2021	Brent Brown	250.00	
	Anedot Fees		10.30
7/8/2021	Carson Buckman	100.00	
7/8/2021	Nathan Adams	100.00	
7/9/2021	Candice Ehasz	100.00	
7/9/2021	Linda Likins	50.00	
	Anedot fees		15.20
5/18/2021	Rapid Roberts	1,500.00	
5/28/2021	Mark/Margaret Bult	1,000.00	
6/23/2021	Ginco Facilities Maintenance	500.00	
7/12/2021	Joe Passanise	100.00	

7/12/2021	Royce Reding	100.00	
	Anedot Fees		8.60
7/14/2021	Tyler Creach	100.00	
7/14/2021	Kandace Prewitt	100.00	
	Anedot Fees		8.60
	Anedot fees		1.30
7/19/2021	Judy Beisner	1,000.00	
	Anedot fees		40.30
7/22/2021	Curtis Jared	250.00	
	Anedot fees		10.30
	Anedot Fees		0.70
8/1/2021	Caleb Arthur	100.00	
8/1/2021	Sam Clifton	100.00	
8/2/2021	John Ruder	100.00	
	Anedot Fees		12.90
8/5/2021	Brent Brown	250.00	
	Anedot Fees		10.30
8/8/2021	Carson Buckman	100.00	
8/8/2021	Nathan Adams	100.00	
	Anedot Fees		8.60
8/9/2021	Candice Ehasse	100.00	
	Anedot fees		4.30
8/12/2021	Royce Reding	100.00	
8/12/2021	Joe Passanise	100.00	
	Anedot Fees		8.60
8/14/2021	Tyler Creach	100.00	
8/14/2021	Kandace Prewitt	100.00	
	Anedot Fees		8.60
8/16/2021	The Prosper Group		1,500.00
8/16/2021	HenryAlan		467.82
8/16/2021	HenryAlan		200.00
8/22/2021	Curtis Jared	250.00	
	Anedot fees		10.30
7/22/2021	Simply Delicious Catering		500.00
	Anedot Fees		4.30
9/1/2021	Caleb Arthur	100.00	
9/1/2021	Sam Clifton	100.00	
	Anedot Fees		8.60
9/2/2021	John Ruder	100.00	
	Anedot fees		4.30
9/5/2021	Brent Brown	250.00	

	Anedot fees		10.30
9/1/2021	HenryAlan		246.60
9/8/2021	Carson Buckman	100.00	
9/8/2021	Nathan Adams	100.00	
9/9/2021	Candice Ehase	100.00	
	Anedot Fees		12.90
9/12/2021	Royce Reding	100.00	
9/12/2021	Joe Passanise	100.00	
	Anedot Fees		8.60
9/14/2021	Kandace Prewitt	100.00	
9/14/2021	Tyler Creach	100.00	
	Anedot Fees		8.60
9/22/2021	Curtis Jared	250.00	
	Anedot Fees		10.30
10/1/2021	Sam Clifton	100.00	
10/1/2021	Caleb Arthur	100.00	
	Anedot fees		8.60
10/2/2021	John Ruder	100.00	
	Anedot Fees		4.30
10/5/2021	Brent Brown	250.00	
	Anedot Fees		10.30
10/8/2021	Carson Buckman	100.00	
10/8/2021	Nathan Adams	100.00	
10/9/2021	Candice Ehase	100.00	
10/12/2021	Royce Reding	100.00	
10/12/2021	Joe Passanise	100.00	
	Anedot fees		21.50
10/8/2021	HenryAlan		251.60
9/14/2021	Royce Reding		1,260.00
10/14/2021	Tyler Creach	100.00	
10/14/2021	Kandace Prewitt	100.00	
	Anedot Fees		8.60
10/22/2021	Curtis Jared	250.00	
	Anedot Fees		10.30
11/1/2021	Sam Clifton	100.00	
11/1/2021	Caleb Arthur	100.00	
11/2/2021	John Ruder	100.00	
	Anedot fees		12.90
11/5/2021	Brent Brown	250.00	
	Anedot Fees		10.30
11/8/2021	Nathan Adams	100.00	

11/8/2021	Carson Buckman	100.00	
	Anedot Fees		8.60
11/9/2021	Candice Ehase	100.00	
	Anedot Fees		4.30
11/12/2021	Royce Reding	100.00	
11/12/2021	Joe Passanise	100.00	
	Anedot Fees		8.60
11/14/2021	Kandace Prewitt	100.00	
11/14/2021	Tyler Creach	100.00	
	Anedot Fees		8.60
11/11/2021	HenryAlan		221.45
11/22/2021	Curtis Jared	250.00	
	Anedot fees		10.30
12/1/2021	Sam Clifton	100.00	
12/1/2021	Caleb Arthur	100.00	
12/2/2021	John Ruder	100.00	
	Anedot Fees		12.90
12/5/2021	Brent Brown	250.00	
	Anedot fees		10.30
12/2/2021	HenryAlan		224.30
12/8/2021	Carson Buckman	100.00	
	Anedot fees		4.30
12/9/2021	Candice Ehase	100.00	
	Anedot Fees		4.30
12/12/2021	Royce Reding	100.00	
12/12/2021	Joe Passanise	100.00	
	Anedot Fees		8.60
12/12/2021	Royce Reding	100.00	
12/12/2021	Joe Passanise	100.00	
	Anedot fees		8.60
1/2/2022	John Ruder	100.00	
	Anedot fees		4.30
12/14/2021	Kandace Prewitt	100.00	
12/14/2021	Tyler Creach	100.00	
	Anedot Fees		8.60
1/5/2022	Brent Brown	250.00	
	Anedot Fees		10.30
1/8/2022	Carson Buckman	100.00	
	Anedot Fees		4.30
1/12/2022	Joe Passanise	100.00	
1/12/2022	Royce Reding	100.00	

	Anedot Fees		8.60
1/14/2022	Kandace Prewitt	100.00	
1/14/2022	Tyler Creach	100.00	
	Anedot Fees		8.60
2/1/2022	Caleb Arthur	100.00	
2/1/2022	Sam Clifton	100.00	
2/2/2022	John Ruder	100.00	
	Anedot fees		12.90
2/5/2022	Brent Brown	250.00	
	Anedot Fees		10.30
2/8/2022	Carson Buckman	100.00	
	Anedot Fees		4.30
2/12/2022	Royce Reding	100.00	
2/12/2022	Joe Passanise	100.00	
	Anedot fees		8.60
2/14/2022	Kandace Prewitt	100.00	
2/14/2022	Tyler Creach	100.00	
	Anedot Fees		8.60
3/1/2022	Sam Clifton	100.00	
3/1/2022	Caleb Arthur	100.00	
3/2/2022	John Ruder	100.00	
	Anedot Fees		12.90
3/8/2022	Carson Buckman	100.00	
	Anedot fees		4.30
3/12/2022	Royce Reding	100.00	
3/12/2022	Joe Passanise	100.00	
	Anedot fees		8.60
3/14/2022	Tyler Creach	100.00	
3/14/2022	Kandace Prewitt	100.00	
	Anedot Fees		8.60
2/25/2022	Rapid Roberts	5,000.00	
3/17/2022	Ax Media		35,105.00
3/24/2022	Curtis Jared	500.00	
	Anedot Fees		20.30
3/28/2022	The Political Firm		4,200.00
3/31/2022	Candice Ehasz	100.00	
3/31/2022	Loren Cook II	3,000.00	
4/1/2022	Caleb Arthur	100.00	
4/1/2022	Sam Clifton	100.00	
	Anedot Fees		133.20
4/2/2022	John Ruder	100.00	

	Anedot Fees		4.30
4/8/2022	Carson Buckman	100.00	
	Anedot fees		4.30
3/15/2022	Rapid Roberts	5,000.00	
4/12/2022	Royce Reding	100.00	
4/12/2022	Joe Passanise	100.00	
	Anedot Fees		8.60
4/14/2022	Tyler Creach	100.00	
4/14/2022	Kandace Prewitt	100.00	
	Anedot fees		8.60
4/24/2022	Curtis Jared	500.00	
	Anedot fees		20.30
4/30/2022	Candice Ehase	100.00	
5/1/2022	Sam Clifton	100.00	
5/1/2022	Caleb Arthur	100.00	
	Anedot Fees		12.90
5/2/2022	John Ruder	100.00	
	Anedot Fees		4.30
	Anedot fees		4.30
5/8/2022	Carson Buckman	100.00	
	Anedot fees		4.30
	Anedot Deposit	300.00	
	Anedot Fees		12.90
	Anedot Deposit	200.00	
	Anedot Fees		8.60
	Anedot Deposit	500.00	
	Anedot Fees		20.30
	Anedot Deposit	100.00	
	Anedot Fees		4.30
6/1/2022	Sam Clifton	100.00	
6/1/2022	Caleb Arthur	100.00	
6/2/2022	John Ruder	100.00	
	Anedot Fees		12.90
6/8/2022	Carson Buckman	100.00	
	Anedot Fees		4.30
6/12/2022	Royce Reding	100.00	
6/12/2022	Joe Passanise	100.00	
6/12/2022	Scott Speight	100.00	
	Anedot Fees		12.90
6/14/2022	Kandace Prewitt	100.00	
6/14/2022	Tyler Creach	100.00	

	Anedot Fees		8.60
6/24/2022	Curtis Jared	500.00	
	Anedot Fees		20.30
6/30/2022	Candice Ehasse	100.00	
	Anedot fees		4.30
7/1/2022	Sam Clifton	100.00	
7/1/2022	Caleb Arthur	100.00	
7/2/2022	John Ruder	100.00	
	Anedot fees		12.90
7/11/2022	Carson Buckman	100.00	
7/12/2022	Royce Reding	100.00	
7/12/2022	Joe Passanise	100.00	
7/12/2022	Scott Speight	100.00	
	Anedot Fees		17.20
7/14/2022	Kandace Prewitt	100.00	
7/14/2022	Tyler Creach	100.00	
	Anedot fees		8.60
7/24/2022	Curtis Jared	500.00	
	Anedot fees		20.30
7/30/2022	Candice Ehasse	100.00	
	Anedot Fees		4.30
8/1/2022	Sam Clifton	100.00	
8/1/2022	Caleb Arthur	100.00	
	Anedot Fees		8.60
8/2/2022	John Ruder	100.00	
	Anedot Fees		4.30
8/8/2022	Carson Buckman	100.00	
	Anedot Fees		4.30
8/12/2022	Royce Reding	100.00	
8/12/2022	Joe Passanise	100.00	
8/12/2022	Scott Speight	100.00	
	Anedot Fees		12.90
8/14/2022	Tyler Creach	100.00	
8/14/2022	Kandace Prewitt	100.00	
	Anedot Fees		8.60
8/24/2022	Curtis Jared	500.00	
	Anedot Fees		20.30
8/30/2022	Candice Ehasse	100.00	
	Anedot Fees		4.30
9/1/2022	Sam Clifton	100.00	
9/1/2022	Caleb Arthur	100.00	

9/2/2022	John Ruder	100.00	
	Anedot fees		12.90
8/31/2022	REDEC Consulting		3,000.00
9/8/2022	Carson Buckman	100.00	
	Anedot fees		4.30
9/12/2022	Scott Speight	100.00	
9/12/2022	Royce Reding	100.00	
9/12/2022	Joe Passanise	100.00	
	Anedot Fees		12.90
9/14/2022	Kandace Prewitt	100.00	
9/14/2022	Tyler Creach	100.00	
	Anedot Fees		8.60
9/24/2022	Curtis Jared	500.00	
	Anedot Fees		20.30
9/30/2022	Candice Ehasz	100.00	
	Anedot fees		4.30
10/1/2022	Sam Clifton	100.00	
10/1/2022	Caleb Arthur	100.00	
10/2/2022	John Ruder	100.00	
	Anedot Fees		12.90
10/8/2022	Carson Buckman	100.00	
	Anedot Fees		4.30
10/12/2022	Royce Reding	100.00	
10/12/2022	Joe Passanise	100.00	
10/12/2022	Scott Speight	100.00	
	Anedot Fees		12.90
10/14/2022	Tyler Creach	100.00	
10/14/2022	Kandace Prewitt	100.00	
	Anedot Fees		8.60
10/24/2022	Curtis Jared	500.00	
	Anedot Fees		20.30
	Interest Deposit	6.48	
10/30/2022	Candice Ehasz	100.00	
	Anedot Fees		4.30
11/1/2022	Sam Clifton	100.00	
11/1/2022	Caleb Arthur	100.00	
	Anedot Fees		8.60
11/2/2022	John Ruder	100.00	
	Anedot fees		4.30
11/8/2022	Carson Buckman	100.00	
	Anedot fees		4.30

11/12/2022	Royce Reding	100.00	
11/12/2022	Joe Passanise	100.00	
11/12/2022	Scott Speight	100.00	
	Anedot Fees		12.90
11/14/2022	Kandace Prewitt	100.00	
11/14/2022	Tyler Creach	100.00	
	Anedot Fees		8.60
11/24/2022	Curtis Jared	500.00	
	Anedot Fees		20.30
	Interest Deposit	51.31	
11/30/2022	Candice Ehasse	100.00	
12/1/2022	Sam Clifton	100.00	
12/1/2022	Caleb Arthur	100.00	
	Anedot Fees		12.90
12/2/2022	John Ruder	100.00	
	Anedot Fees		4.30
12/8/2022	Carson Buckman	100.00	
	Anedot Fees		4.30
12/12/2022	Joe Passanise	100.00	
12/12/2022	Scott Speight	100.00	
12/12/2022	Royce Reding	100.00	
	Anedot Fees		12.90
12/14/2022	Kandace Prewitt	100.00	
12/14/2022	Tyler Creach	100.00	
	Anedot Fees		8.60
12/24/2022	Curtis Jared	500.00	
	Anedot Fees		20.30
	Interest Deposit	57.73	
12/30/2022	Candice Ehasse	100.00	
	Anedot Fees		4.30
1/1/2023	Caleb Arthur	100.00	
1/1/2023	Sam Clifton	100.00	
1/2/2023	John Ruder	100.00	
	Anedot fees		12.90
1/8/2023	Carson Buckman	100.00	
	Anedot fees		4.30
1/12/2023	Joe Passanise	100.00	
1/12/2023	Scott Speight	100.00	
1/12/2023	Royce Reding	100.00	
	Anedot Fees		12.90
1/14/2023	Kandace Prewitt	100.00	

1/14/2023	Tyler Creach	100.00	
	Anedot Fees		8.60
1/24/2023	Curtis Jared	500.00	
	Anedot Fees		20.30
	Interest Deposit	63.40	
1/30/2023	Candice Ehase	100.00	
	Anedot Fees		4.30
2/1/2023	Caleb Arthur	100.00	
2/1/2023	Sam Clifton	100.00	
	Anedot Fees		8.60
2/2/2023	John Ruder	100.00	
	Anedot Fees		4.30
2/8/2023	Carson Buckman	100.00	
	Anedot Fees		4.30
2/12/2023	Scott Speight	100.00	
2/12/2023	Royce Reding	100.00	
2/12/2023	Joe Passanise	100.00	
	Anedot Fees		12.90
2/14/2023	Kandace Prewitt	100.00	
2/14/2023	Tyler Creach	100.00	
	Anedot Fees		8.60
2/24/2023	Curtis Jared	500.00	
	Anedot Fees		20.30
	Interest Deposit	61.74	
	Totals	127,040.66	119,826.25

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

DEC 18 2024

**Missouri Ethics
Commission**

MISSOURI ETHICS)
COMMISSION,)
)
Petitioner,)
)
v.)
)
TRUTH IN POLITICS,)
Nonprofit Organization,)
)
CURTIS JARED,)
President,)
)
GEORGE HUSTED,)
Secretary & Treasurer,)
)
LEE FRALEY)
Director,)
)
ROYCE REDING,)
Director,)
)
SAM CLIFTON)
Director,)
)
Respondents.)

Case No. 22-0039-I

CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.021, 130.041, 130.044, 130.046.3, and 130.050 RSMo, and pursuant to § 105.961.4, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130.

2. Respondents are assessed a fee in the amount of \$ 249,446, pursuant to § 105.961.4(6), due by check or money order and payable to the Missouri Ethics Commission within sixty (60) days of the issuance of this Order.
3. If Respondents pay \$ 20,000 of the assessed fee within forty-five (45) days of the issuance of this Order, the remainder of the fee will be stayed for a period of two years. If Respondents do not commit any further violations of Chapter 130, the remainder of the fee shall be dissolved. If there is probable cause to believe any Respondent committed any further violations of the campaign finance laws under Chapter 130 within the two-year period, the remainder of the fee shall be due immediately upon such a finding.
4. Respondents shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 18th day of December, 2024

Robin Wheeler Sanders

Robin Wheeler Sanders, Chair
Missouri Ethics Commission