

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

**Filed**

DEC 17 2024

Missouri Ethics  
Commission

MISSOURI ETHICS )  
COMMISSION, )  
 )  
Petitioner, )  
 )  
v. )  
 )  
JUANICE WILLIAMS, )  
Candidate, )  
 )  
and )  
 )  
FRIENDS TO ELECT JUANICE )  
WILLIAMS, )  
Candidate Committee, )  
 )  
Respondents. )

Case No. 24-0040-I

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

The Missouri Ethics Commission (“MEC”), together with Juanice Williams and Friends to Elect Juanice Williams (“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. Juanice Williams was an unsuccessful candidate for board member of Lee's Summit School District in the April 2, 2024, election.
2. Friends to Elect Juanice Williams was a candidate committee registered with the MEC on January 2, 2024, and terminated on May 14, 2024.
3. Pursuant to § 105.961, the MEC's staff investigated a complaint filed with the Commission and reported the investigation findings to the Commission.
4. The Commission determined there were reasonable grounds to believe violations of the law had occurred and authorized a hearing pursuant to § 105.961.3.

**COUNT I**

*Failure to Accurately Report a Contribution*

5. Respondents inaccurately reported an in-kind contribution of \$510 from Tracy Woodman received on March 8, 2024, on their 8 Day Before April 2, 2024, Election Report. The contributor’s address and employer or occupation were listed as “unknown.”

**COUNT II**

*Failure to Accurately Report Expenditures*

6. Respondents reported a total of \$2,321.23 in expenditures for advertisements paid to Facebook as shown below.

<b>Expenditure Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report Showing Expenditure</b>
Facebook	2/20/2024	\$900	8 Day Before April 2, 2024, Election
Facebook	3/25/2024	\$81.69	April 2024 Quarterly
Facebook	3/25/2024	\$211.45	April 2024 Quarterly
Facebook	3/25/2024	\$526.59	April 2024 Quarterly
Facebook	3/27/2024	\$202.63	April 2024 Quarterly
Facebook	4/2/2024	\$194.96	Termination
Facebook	4/3/2024	\$203.91	Termination
	<b>Total</b>	<b>\$2,321.23</b>	

7. Facebook Ad Library records indicate Respondents made a total of \$799 in expenditures for advertisements published between February 2024, and April 2024.

8. Respondents inaccurately reported an excess of \$1,523.23 in expenditures to Facebook on three (3) reports.

### COUNT III

#### *Acceptance of Unregistered LLC Contribution*

9. Respondents reported the receipt of a \$400 contribution from D. Smith Consulting Group, LLC on March 7, 2024.

10. D. Smith Consulting Group, LLC is not classified as a corporation under the federal tax code.

11. As of March 7, 2024, D. Smith Consulting Group, LLC was not registered with MEC as required by § 130.029.4.

### CONCLUSIONS OF LAW

#### COUNT I

#### *Failure to Accurately Report a Contribution*

12. Committees are required to report receipts at the times and for the periods prescribed in § 130.046, including:

(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[.]

§ 130.041.1(3), RSMo.

13. Where Respondents reported an in-kind contribution received and failed to include the address and employer of a contributor giving more than \$100, there is probable cause to believe Respondents violated § 130.041.1(3)(e), giving this Commission power to act, as permitted under § 105.961.

## COUNT II

### *Failure to Accurately Report Expenditures*

14. Committees are required to report expenditures at the times and for the periods prescribed in § 130.046, including:

- (4) Expenditures for the period, including:
  - (a) The 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[.]

§ 130.041.1(4), RSMo.

15. Where Respondents failed to accurately report a total of \$799 in Facebook expenditures there is probable cause to believe that Respondents violated § 130.041.1(4), giving this Commission power to act, as permitted under § 105.961.

## COUNT III

### *Acceptance of Unregistered LLC Contribution*

16. Section 130.029.4 allows for a committee to accept a contribution from a limited liability company (LLC), when:

- (1) Any limited liability company that is duly registered pursuant to chapter 347 and that has not elected to be classified as a corporation under the federal tax code may make contributions to any committee if the limited liability company has:

(a) Been in existence for at least one year prior to such contribution; and

(b) Electronically filed with the Missouri ethics commission indicating that the limited liability company is a legitimate business with a legitimate business interest and is not created for the sole purpose of making campaign contributions.

17. Section 130.036.2 defines when a contribution is considered to have been accepted:

Unless a contribution is rejected by the candidate or committee and returned to the donor or transmitted to the state treasurer within ten business days after its receipt, it shall be considered received and accepted on the date received, notwithstanding the fact that it was not deposited by the closing date of a reporting period.

18. Where Respondents accepted a \$400 contribution from D. Smith Consulting Group, LLC on March 7, 2024, and failed to return the contribution within ten (10) business days; there is probable cause to believe Respondents violated § 130.029.4 giving this Commission the power to act as permitted by § 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 §§ 130.029.4, 130.041.1(3)(e), and 130.041.1(4), RSMo. and pursuant to §105.961.4, hereby **ORDERS**:

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

2. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$2,400, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$600 within forty-five 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 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.

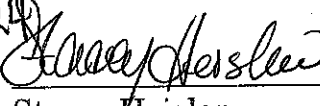
5. This agreement shall become effective immediately upon (1) the signature of all parties; (2) adoption of the Joint Proposed Findings of Fact, Conclusions of Law by the Missouri Ethics Commission; and (3) issuance of a Final Order by the Commission, without any further action of the parties.

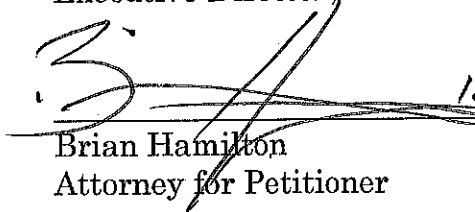
SO AGREED:

RESPONDENT JUANICE WILLIAMS

MISSOURI ETHICS COMMISSION

  
Date 12/9/2024  
Juanice Williams

  
Date 12/17/2024  
Stacey Heislen  
Executive Director,

  
Date 12/17/24  
Brian Hamilton  
Attorney for Petitioner



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immediately upon final adjudication finding that there was probable cause to believe that such Respondent has committed such a violation.

4. Respondents shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 20th day of December, 2024

*Robin Wheeler Sanders*

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Robin Wheeler Sanders, Chair  
Missouri Ethics Commission