

Filed

FEB 04 2025

Missouri Ethics
Commission

BEFORE THE
MISSOURI ETHICS COMMISSION

MISSOURI ETHICS)
 COMMISSION,)
)
 Petitioner,)
)
 v.)
)
 19 WARD DEMOCRATIC)
 ASSOCIATION, Continuing)
 Committee,)
)
 and)
)
 QUEEN BYRD, Treasurer,)
)
 Respondents.)

Case No. 22-0016-A

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

The Missouri Ethics Commission (“MEC”), together with 19 Ward Democratic Association and Queen Byrd (“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. 19 Ward Democratic Association is a continuing committee established with the Missouri Ethics Commission on March 15, 2019.
2. Queen Byrd has been the treasurer since the committee's inception.
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 register a committee by filing a Statement of Organization.

5. Respondents exceeded \$500.00 in contributions with the receipt of a \$1,200.00 contribution on November 5, 2018.

6. Respondents should have filed a Statement of Committee Organization within twenty days of November 5, 2018.

7. Respondents filed a Statement of Committee Organization with the Missouri Ethics Commission on March 15, 2019.

COUNT II

Cash contributions and cash expenditures in excess of limits.

8. In 2020, Respondents made a \$300.00 cash deposit into the official depository account, exceeding the \$100.00 allowable amount for each cash contribution received. Without committee records or explanation from the treasurer, it's unknown whether the deposit included multiple contributions and the amount of each one.

9. In 2018, Respondents wrote a check for \$286.70 to cash, used to pay for printing services.

COUNT III

Failure to timely and accurately file campaign finance disclosure reports.

10. Respondents filed a Statement of Limited Activity in 2019 that should have been a full disclosure April Quarterly Report. In the reporting period, there were contributions and/or expenditures that exceeded \$500.00.

11. From 2019 through 2022, Respondents failed to timely file eleven (11) Statements of Limited Activity in lieu of quarterly reports.

Report Name	Report Year	Due Date	Date Filed
April Quarterly Report - Limited Activity	2019	4/15/19	5/3/19
July Quarterly Report - Limited Activity	2019	7/15/19	7/19/19
January Quarterly Report - Limited Activity	2020	1/15/20	1/24/20
April Quarterly Report - Limited Activity	2020	4/15/20	4/26/20
April Quarterly Report - Limited Activity	2021	4/15/21	4/20/21
July Quarterly Report - Limited Activity	2021	7/15/21	8/1/21
October Quarterly Report - Limited Activity	2021	10/15/21	10/19/21
January Quarterly Report - Limited Activity	2022	1/17/22	1/19/22
April Quarterly Report - Limited Activity	2022	4/15/22	4/19/22
July Quarterly Report - Limited Activity	2022	7/15/22	7/18/22
October Quarterly Report - Limited Activity	2022	10/17/22	10/27/22

12. Between 2020 and 2022, Respondents failed to file seven (7) reports.

Report Name	Report Year	Start Date	End Date	Due Date
24 Hour Expenditure Report - 8/4/20	2020	4/1/19	7/31/20	8/1/20
30 Day After Primary - 8/4/20	2020	8/1/20	8/29/20	9/3/20
8 Day Before General - 11/3/20	2020	10/1/20	10/22/20	10/27/20
30 Day After General - 11/3/20	2020	10/23/20	11/28/20	12/3/20
8 Day Before General - 4/6/21	2021	11/29/20	3/25/21	3/30/21
30 Day After General - 4/6/21	2021	4/1/21	5/1/21	5/6/21
30 Day After General - 11/8/22	2022	3/26/21	12/3/22	12/8/22

COUNT IV

Failure to timely and accurately report contributions.

13. Respondents failed to report fifteen (15) contributions totaling \$5,500.00.

Contributor Name	Amount	Date	Report Not Showing Contribution
Cash deposit	\$25.00	8/1/18	April Quarterly 2019
Transfer	\$75.00	8/1/18	April Quarterly 2019
Marlene Davis	\$50.00	7/23/20	24 Hour Expenditure
Marlene Davis	\$50.00	7/23/20	24 Hour Expenditure
Democratic Campaign Committee of St. Louis City PAC	\$250.00	8/8/18	April Quarterly 2019
Democratic Federal Campaign Committee of St. Louis City PAC	\$1,200.00	11/5/18	April Quarterly 2019
V.J. Cross	\$500.00	3/4/19	April Quarterly 2019

Cash deposit	\$300.00	5/1/20	24 Hour Expenditure
Marlene Davis	\$150.00	9/30/20	8 Day Before General 11/3/20
Democratic Campaign Committee of St. Louis City PAC	\$1,200.00	10/30/20	8 Day Before General 11/3/20
Marlene Davis	\$500.00	2/27/21	8 Day Before General 11/3/20
Marlene Davis	\$400.00	3/20/21	8 Day Before General 11/3/20
Lyda Krewson Leadership PAC Lyda PAC	\$200.00	3/25/21	8 Day Before General 11/3/20
Democratic Campaign Committee of St. Louis City PAC	\$400.00	11/2/22	30 Day After General 11/8/22
St. Louis Teachers Local 420 COPE Contribution Fund	\$200.00	11/7/22	30 Day After General 11/8/22
Total	\$5,500.00		

COUNT V

Failure to timely and accurately report expenditures.

14. Respondents failed to report ninety-two (92) expenditures totaling \$5,137.31. Attachment 1.

CONCLUSIONS OF LAW

COUNT I

Failure to timely register a committee by filing a Statement of Organization.

15. 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.

16. 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[.]

17. 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[.]

18. 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.

19. Where Respondents exceeded the threshold of contributions to register a committee, Respondents failed to file a Statement of Committee within twenty days of meeting the requirement, there is probable cause to believe Respondents violated 130.021(5) giving this Commission the power to act as permitted under § 105.961.

COUNT II

Cash contributions and cash expenditures in excess of limits.

20. “No contribution of cash in an amount of more than one hundred dollars shall be made by or accepted from any single contributor for any election by a... candidate committee.” § 130.031.1, RSMo.

21. “Each expenditure of more than fifty dollars, except an in-kind expenditure, shall be made by check drawn on the committee's depository and signed

by the committee treasurer, deputy treasurer or candidate. A single expenditure from a petty cash fund shall not exceed fifty dollars.” § 130.031.2, RSMo.

22. Where Respondents deposited a cash contribution over \$100 and withdrew a cash expenditure over \$50 each, there is probable cause to believe Respondents violated §§ 130.031.1 and 130.031.2 giving this Commission the power to act as permitted under § 105.961.

COUNT III

Failure to timely and accurately file campaign finance disclosure reports.

23. Pursuant to § 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[.]

24. Pursuant to § 130.046.5(2), RSMo,

No disclosure report needs to be filed for any reporting period if during that reporting period the committee has neither received contributions

aggregating more than five hundred dollars nor made expenditures aggregating more than five hundred dollars and has not received contributions aggregating more than three hundred dollars from any single contributor and if the committee's treasurer files a statement with the appropriate officer that the committee has not exceeded the identified thresholds in the reporting period. Any contributions received or expenditures made which are not reported because this statement is filed in lieu of a disclosure report shall be included in the next disclosure report filed by the committee. This statement shall not be filed in lieu of the report for two or more consecutive disclosure periods if either the contributions received or expenditures made in the aggregate during those reporting periods exceed five hundred dollars.

25. "A continuing committee shall submit 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... (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[.]" § 130.046.3(2), RSMo.

26. Where Respondents untimely filed six (6) campaign finance reports and three (3) statements of limited activity, there is probable cause to believe Respondents violated § 130.046, RSMo, giving this Commission the power to act as permitted under § 105.961.

COUNT IV

Failure to timely and accurately report contributions.

27. 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;

...

(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.

28. Where Respondents failed to report fifteen (15) contributions, there is probable cause to believe Respondents violated § 130.041.1(3), RSMo, giving this Commission the power to act as permitted under § 105.961.

COUNT V

Failure to timely and accurately report expenditures.

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

(a) The total dollar amount of expenditures made by check drawn on the committee's depository;

(b) The total dollar amount of expenditures made in cash;

...

(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.

30. Where Respondents failed to report ninety-two (92) expenditures, 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 §§ 130.021(5), 130.031.1, 130.031.2, 130.041.1(3), 130.041.1(4), and 130.046, RSMo and pursuant to § 105.961.4, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130, RSMo.
2. It is the Order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$13,223.00, pursuant to Section 105.961.4(6), RSMo. The Commission will stay imposition of \$11,902.00 of that fee on the condition that, beginning in April of 2025, Respondents shall make monthly payments by check or money order made payable to the Missouri Ethics Commission.

3. Respondents shall pay at least \$220 per month until the entire remaining balance of \$1,321.00 is paid in full or until six consecutive months have elapsed, whichever comes first.
4. Regardless of the stay and payment plan in paragraph 2 above, if there is probable cause to believe that any Respondent committed any further violation of the campaign finance laws under Chapter 130, RSMo, within the two-year period from the date of this Consent Order, then the Respondent who committed the violation will be required to pay the remainder of the fee. Additionally, the finding of such a violation will void the payment plan and the balance of the fee will be due immediately upon final adjudication finding that there was probable cause to believe such Respondent has committed such a violation.
5. Respondents shall be jointly and severally liable for all fees imposed under this order

III.

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

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

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

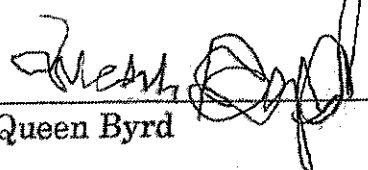
4. Respondents, together with their heirs, assigns, agents, representatives and attorneys, do hereby waive, release, acquit and forever discharge the Missouri Ethics Commission, the Commission's respective members, employees, agents and attorneys including former members, employees, agents and attorneys, of, or from any liability, claim, actions, causes of action, fees, costs, expenses and compensation, including, but not limited to, any claim for attorney's fees and expenses, whether or

not now known or contemplated, including, but not limited to, any claims pursuant to Section 536.087, RSMo, as amended, or any claim arising under 42 U.S.C. § 1983, which now or in the future may be based upon, arise out of, or relate to any of the matters raised in this case or its litigation or from the negotiation or execution of this Joint Stipulation. The parties acknowledge that this paragraph is severable from the remaining portions of this agreement in that it survives in perpetuity even in the event that any court or administrative tribunal deems this agreement or any portion thereof void or unenforceable.

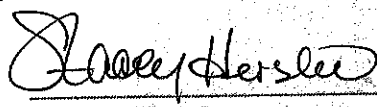
5. This agreement shall become effective immediately upon (1) the signature of all parties; (2) adoption of the Joint Proposed Findings of Fact, Conclusions of Law by the Missouri Ethics Commission; and (3) issuance of a Final Order by the Commission, without any further action of the parties.

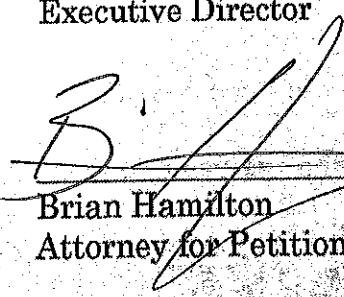
SO AGREED:

RESPONDENTS QUEEN BYRD, 19
WARD DEMOCRATIC ASSOCIATION


Queen Byrd
2/4/25
Date

MISSOURI ETHICS COMMISSION


Stacey Heislen
Executive Director
2/4/2025
Date


Brian Hamilton
Attorney for Petitioner
2/4/25
Date

Attachment 1.

Expenditure Name	Purpose	Amount	Date	Report Not Showing Expenditure
Simmons Bank	Paper statement fee	\$2.00	9/28/18	April Quarterly 2019
Simmons Bank	Paper statement fee	\$2.00	10/31/18	April Quarterly 2019
Schnucks	Food	\$13.95	11/6/18	April Quarterly 2019
Gaila Brown	Poll worker	\$100.00	11/6/18	April Quarterly 2019
Lloyd Anderson	Poll worker	\$100.00	11/6/18	April Quarterly 2019
David Stidum	Poll worker	\$100.00	11/6/18	April Quarterly 2019
Terrell Moore	Poll worker	\$100.00	11/6/18	April Quarterly 2019
Subway	Food	\$28.61	11/7/18	April Quarterly 2019
Deluxe Check Check/Acc.	Checks	\$19.40	11/14/18	April Quarterly 2019
Simmons Bank	Paper statement fee	\$2.00	11/30/18	April Quarterly 2019
Simmons Bank	Paper statement fee	\$2.00	12/31/18	April Quarterly 2019
CITY OF ST. LOUIS-PA ST LOUIS MO 76404342		\$2.00	1/28/19	April Quarterly 2019
Simmons Bank	Paper statement fee	\$2.00	1/31/19	April Quarterly 2019
Simmons Bank	Paper statement fee	\$2.00	2/28/19	April Quarterly 2019
David Stidum	Poll worker	\$100.00	3/5/19	April Quarterly 2019
Andrea Cavanaugh	Poll worker	\$100.00	3/5/19	April Quarterly 2019
Anthony Powell	Poll worker	\$100.00	3/5/19	April Quarterly 2019
Jeff Bradbury	Poll worker	\$100.00	3/5/19	April Quarterly 2019
Simmons Bank	Paper statement fee	\$2.00	3/29/19	April Quarterly 2019
Simmons Bank	Service charge	\$3.00	4/30/19	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	5/31/19	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	6/28/19	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	7/31/19	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	8/30/19	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	9/30/19	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	10/31/19	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	11/29/19	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	12/31/19	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	1/31/20	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	2/28/20	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	3/31/20	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	4/30/20	24 Hour Expenditure

Simmons Bank	Service charge	\$3.00	5/29/20	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	6/30/20	24 Hour Expenditure
Simmons Bank	Service charge	\$3.00	7/31/20	24 Hour Expenditure
The Inkspot	Printing	\$84.45	7/31/20	24 Hour Expenditure
Ruth Phillips	Poll worker	\$100.00	8/4/20	30 Day After Primary 8/4/20
David Stidum	Poll worker	\$100.00	8/4/20	30 Day After Primary 8/4/20
Florence Jones	Poll worker	\$100.00	8/4/20	30 Day After Primary 8/4/20
Lloyd Anderson	Poll worker	\$100.00	8/4/20	30 Day After Primary 8/4/20
Richard Dalton	Poll worker	\$100.00	8/4/20	30 Day After Primary 8/4/20
Simmons Bank	Service charge	\$3.00	8/31/20	8 Day Before General 11/3/20
Simmons Bank	Service charge	\$3.00	9/30/20	8 Day Before General 11/3/20
Simmons Bank	Service charge	\$3.00	10/30/20	30 Day After General 11/3/20
Krispy Kreme	Food	\$24.38	11/4/20	30 Day After General 11/3/20
Simmons Bank	Service charge	\$3.00	11/30/20	8 Day Before General 4/6/21
Simmons Bank	Service charge	\$3.00	12/31/20	8 Day Before General 4/6/21
The Inkspot	Printing	\$65.81	1/25/21	8 Day Before General 4/6/21
The Inkspot	Printing	\$62.82	1/29/21	8 Day Before General 4/6/21
Simmons Bank	Service charge	\$3.00	1/29/21	8 Day Before General 4/6/21
Simmons Bank	Service charge	\$3.00	2/26/21	8 Day Before General 4/6/21
Debra White	Poll worker	\$100.00	3/2/21	8 Day Before General 4/6/21
Florence Jones	Poll worker	\$100.00	3/2/21	8 Day Before General 4/6/21
Krispy Kreme	Food	\$23.14	3/4/21	8 Day Before General 4/6/21
The Inkspot	Printing	\$66.57	3/19/21	8 Day Before General 4/6/21
The Inkspot	Printing	\$60.32	3/29/21	30 Day After General 11/8/22
Simmons Bank	Service charge	\$3.00	3/31/21	30 Day After General 11/8/22
Quik Trip St. Louis, MO	Gas	\$55.00	4/5/21	30 Day After General 11/8/22
Simmons Bank	Service charge	\$3.00	4/30/21	30 Day After General 11/8/22
Simmons Bank	Service charge	\$3.00	5/28/21	30 Day After General 11/8/22
Simmons Bank	Service charge	\$3.00	6/30/21	30 Day After General 11/8/22
Simmons Bank	Service charge	\$3.00	7/30/21	30 Day After General 11/8/22
Simmons Bank	Paper statement fee commercial	\$5.00	8/31/21	30 Day After General 11/8/22
Simmons Bank	Paper statement fee commercial	\$5.00	9/30/21	30 Day After General 11/8/22
Simmons Bank	Paper statement fee commercial	\$5.00	10/29/21	30 Day After General 11/8/22
Simmons Bank	Paper statement fee commercial	\$5.00	11/30/21	30 Day After General 11/8/22
Simmons Bank	Paper statement fee commercial	\$5.00	12/31/21	30 Day After General 11/8/22

Simmons Bank	Paper statement fee commercial	\$5.00	1/31/22	30 Day After General 11/8/22
Simmons Bank	Paper statement fee commercial	\$5.00	2/28/22	30 Day After General 11/8/22
Simmons Bank	Paper statement fee commercial	\$5.00	3/31/22	30 Day After General 11/8/22
Simmons Bank	Paper statement fee commercial	\$5.00	4/29/22	30 Day After General 11/8/22
Simmons Bank	Paper statement fee commercial	\$5.00	6/1/22	30 Day After General 11/8/22
Simmons Bank	Paper statement fee commercial	\$5.00	7/1/22	30 Day After General 11/8/22
Simmons Bank	Paper statement fee commercial	\$5.00	8/1/22	30 Day After General 11/8/22
Simmons Bank	Paper statement fee commercial	\$5.00	9/1/22	30 Day After General 11/8/22
Simmons Bank	Paper statement fee commercial	\$5.00	10/3/22	30 Day After General 11/8/22
Simmons Bank	Service charge	\$10.00	10/31/22	30 Day After General 11/8/22
Unknown	Unknown	\$125.00	10/1/18	April Quarterly 2019
Check to cash	Ballot printing	\$286.70	11/6/18	April Quarterly 2019
The Inkspot	Printing	\$220.30	7/27/20	24 Hour Expenditure
The Inkspot	Printing	\$119.00	10/2/20	8 Day Before General 11/3/20
The Inkspot	Printing	\$176.86	11/3/20	30 Day After General 11/3/20
David Stidum	Poll worker	\$125.00	11/3/20	30 Day After General 11/3/20
Florence Jones	Poll worker	\$125.00	11/3/20	30 Day After General 11/3/20
Ruth Phillips	Poll worker	\$125.00	11/3/20	30 Day After General 11/3/20
Richard Dalton	Poll worker	\$125.00	11/3/20	30 Day After General 11/3/20
Lloyd Anderson	Poll worker	\$125.00	11/3/20	30 Day After General 11/3/20
Debra White	Poll worker	\$125.00	11/3/20	30 Day After General 11/3/20
Lloyd Anderson	Poll worker	\$125.00	4/6/21	30 Day After General 11/8/22
Florence Jones	Poll worker	\$125.00	4/6/21	30 Day After General 11/8/22
Queen Byrd	Unknown	\$700.00	11/9/22	30 Day After General 11/8/22
SMD Consulting Service, LLC	Poll workers and lunches	\$325.00	11/14/22	30 Day After General 11/8/22
Total		\$5,137.31		

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

FEB 05 2025

Missouri Ethics
Commission

MISSOURI ETHICS)
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19 WARD DEMOCRATIC)
ASSOCIATION, Continuing)
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and)
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QUEEN BYRD, Treasurer,)
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Respondents.)

Case No. 22-0016-A

CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.021(5), 130.031.1, 130.031.2, 130.041.1(3), 130.041.1(4), and 130.046, RSMo and pursuant to § 105.961.4, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130, RSMo.
2. It is the Order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$13,223.00, pursuant to Section 105.961.4(6), RSMo. The Commission will stay imposition of \$11,902.00 of that fee on the condition that, beginning in April of 2025, Respondents shall make monthly payments by check or money order made payable to the Missouri Ethics Commission.
3. Respondents shall pay at least \$220 per month until the entire remaining balance of \$1,321.00 is paid in full or until six consecutive months have elapsed, whichever comes first.
4. Regardless of the stay and payment plan in paragraph 2 above, if there is probable cause to believe that any Respondent committed any further violation of the campaign finance laws under Chapter 130, RSMo, within

the two-year period from the date of this Consent Order, then the Respondent who committed the violation will be required to pay the remainder of the fee. Additionally, the finding of such a violation will void the payment plan and the balance of the fee will be due immediately upon final adjudication finding that there was probable cause to believe such Respondent has committed such a violation.

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

SO ORDERED this 5th day of February, 2025

Robin Wheeler Sanders

Robin Wheeler Sanders, Chair
Missouri Ethics Commission