

Filed

NOV 26 2025

Missouri Ethics  
Commission

BEFORE THE  
MISSOURI ETHICS COMMISSION

MISSOURI ETHICS )  
COMMISSION, )  
 )  
Petitioner, )  
v. )  
 )  
JASON LUNA, )  
Candidate, )  
 )  
and )  
 )  
CITIZENS TO ELECT JASON )  
LUNA MONTGOMERY COUNTY )  
CORONER, Candidate Committee, )  
 )  
Respondents. )

Case No. 24-0047-I, 24-0074-I

JOINT FINDINGS OF FACT,  
CONCLUSIONS OF LAW, AND ORDER

The Missouri Ethics Commission ("MEC"), together with Jason Luna and Citizens to Elect Jason Luna Montgomery County Coroner ("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. Respondent Luna was a successful candidate for Montgomery County Coroner in the August 6, 2024, primary election.
2. Respondent Palitzsch's candidate committee, Citizens to elect Jason Luna Montgomery County Coroner, was established on April 11, 2024.
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 File Statement of Committee Organization*

5. On March 6, 2024, Respondents accepted a \$500 contribution check from Jay's Barber Shop. The check was written out to Citizens for Jason Luna and deposited into the committee's bank account that same day.

6. Respondents filed a Statement of Committee Organization with the Missouri Ethics Commission for the committee, Citizens to Elect Jason Luna Montgomery County Coroner, on April 11, 2024.

## COUNT II

### *Failure To Timely and Accurately File Reports*

7. Respondents failed to file the April 2024 Quarterly Report as required.

## COUNT III

### *Failure To Timely and Accurately Report Contributions*

8. Between February 21, 2024, and March 31, 2024, Respondents received at least three (3) monetary contributions totaling \$620.00. These contributions should have been reported on the April 2024 Quarterly Report. Respondents did not file an April 2024 Quarterly Report.

Date	Contributor	Report Not Showing Contribution	Amount
2/29/2024	Jay's Barber Shop	April 2024 Quarterly	\$20.00
3/6/2024	Jay's Barber Shop	April 2024 Quarterly	\$500.00
3/6/2024	Michael Deering	April 2024 Quarterly	\$100.00
Total			\$620.00

9. Respondents inaccurately reported a contribution of \$2,500.00 received from Jay's Barber Shop on May 1, 2024; when in fact there were three (3) contributions which should have been itemized as contributions received.

Date	Contributor	Report Not Showing Contribution	Amount
3/6/2024	Jay's Barber Shop	April 2024 Quarterly	\$500.00
5/1/2024	Jay's Barber Shop	July 2024 Quarterly	\$1,000.00
5/31/2024	Jay's Barber Shop	July 2024 Quarterly	\$1,000.00
Total			\$2,500.00

#### COUNT IV

##### *Failure To Timely and Accurately Report Expenditures*

10. Between February 26, 2024, and March 30, 2024, Respondents made at least five (5) expenditures totaling \$624.80. These expenditures should have been on the April 2024 Quarterly Report. Respondents did not file an April 2024 Quarterly Report.

Date	Expenditure Name	Report Showing Expenditure	Amount
2/26/2024	Mark's Quick Print	April 2024 Quarterly	\$349.01
3/01/2024	Montgomery Standard	April 2024 Quarterly	\$144.50
3/11/2024	People's Saving Bank	April 2024 Quarterly	\$21.79
3/16/2024	Optic News Ad	April 2024 Quarterly	\$94.50
3/22/2024	MCT Primary Voting List	April 2024 Quarterly	\$15.00
Total			\$624.80

11. Respondents inaccurately reported a \$784.00 expenditure to Mark's Quick Print as \$748.00 on the July 2024 Quarterly Report.

#### COUNT V

##### *Acceptance Of Unregistered LLC Contributions*

12. Jay's Barber Shop, LLC registered with the MEC on July 25, 2024.

13. Between February 2024 and June 2024, Respondents accepted at least five (5) contributions from Jay's Barber Shop, LLC totaling \$3,020.00.

## COUNT VI

### *Failure To Include an Accurate "Paid For By" Disclosure*

14. On or about February 26, 2024, Respondent Luna purchased and displayed signs in support of his candidacy for Montgomery County Corner, for the August 6, 2024, primary election using the committee's bank account which contained contributions received by individuals other than himself.

15. The signs included a disclosure which read, "Paid for by the Citizens to elect Jason Luna Montgomery County Corner, Michelle Luna Treasurer."

16. The signs should have contained the clear and conspicuous statement, "Paid for by the Citizens to elect Jason Luna Montgomery County Corner" followed by the committee treasurer's name and title but did not.

17. On or about May 7, 2024, Respondent Luna corrected the "Paid for by" disclosure on the signs.

## **CONCLUSIONS OF LAW**

### COUNT I

#### *Failure to Timely File Statement of Committee Organization*

18. Pursuant to § 130.011(9), a candidate committee is:

a committee which shall be formed by a candidate to receive contributions or make expenditures in behalf of the person's candidacy and which shall continue in existence for use by an elected candidate or which shall terminate the later of either thirty days after the general election for a candidate who was not elected or upon the satisfaction of all committee debt after the election[.]

19. The provision defining exemptions for certain candidates from filing requirements goes on to set threshold limits before activity by a candidate for county

office requires they form a committee, § 130.016.6 excludes the following from the definition of committee:

No candidate for ... county office ... shall be required to file an exemption statement pursuant to this section in order to be exempted from forming a committee and filing disclosure reports required of committees pursuant to this chapter if the aggregate of contributions received or expenditures made by the candidate and any other person with the candidate's knowledge and consent in support of the person's candidacy does not exceed one thousand dollars and the aggregate of contributions from any single contributor does not exceed three hundred twenty-five dollars ...

20. 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[.]

21. "Contribution" includes, but is not limited to: (a) A candidate's own money or property used in support of the person's candidacy other than expense of the candidate's food, lodging, travel, and payment of any fee necessary to the filing for public office[.]" § 130.011(12)(a), RSMo.

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. Lastly, 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 a contribution from a single contributor that exceed three hundred twenty-five dollars; and where Respondents failed to register a committee within the time limits prescribed by § 130.021, there is probable cause to believe they violated §§ 130.016 & 130.021, giving this commission the power to act as permitted under § 105.961.

## COUNT II

### *Failure to Timely and Accurately File Reports*

25. 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.

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

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

...

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

...

3. The candidate, if applicable, treasurer or deputy treasurer of a committee shall file disclosure reports pursuant to this section, except for any calendar quarter in which the contributions received by the committee or the expenditures

or contributions made by the committee do not exceed five hundred dollars. The reporting dates and periods covered for such quarterly reports shall not be later than the fifteenth day of January, April, July and October for periods closing on the thirty-first day of December, the thirty-first day of March, the thirtieth day of June and the thirtieth day of September[.]

27. Respondents failed to file the April 2024 Quarterly Report as required.

28. Where the April 2024 Quarterly Report was required to be filed by § 130.046.1(3), and where Respondents failed to do so timely, there is probable cause to believe Respondents violated said section, giving this Commission the power to act, as permitted under § 105.961.

### COUNT III

#### *Failure to Timely and Accurately Report Contributions*

29. Section 130.041.1(3), RSMo requires committees to report receipts for each reporting period on all disclosure reports, requiring:

(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 ...

...

(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[.]



30. Where Respondents failed to report three (3) contributions and where Respondents should have itemized three (3) contributions; there is probable cause to believe they violated § 130.041.1(3), giving this Commission power to act, as permitted under § 105.961.

#### COUNT IV

##### *Failure to Timely and Accurately Report Expenditures*

31. Section 130.041.1(4), RSMo lays out what is required of committees in disclosure reports, 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[.]

32. Where Respondent's failed to timely report five (5) expenditures and inaccurately reported one expenditure; there is probable cause to believe Respondents violated § 130.041.1(4), giving this Commission the power to act, as permitted under § 105.961.

#### COUNT V

##### *Acceptance of Unregistered LLC Contributions*

33. Section 130.029.4 allows for a candidate committee's acceptance of a contribution from a limited liability company (LLC), stating:

4. (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.

34. 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.

35. Where Respondents accepted contributions from Jay's Barber Shop, LLC prior to the LLC registration with the MEC; there is probable cause to believe Respondents violated § 130.029.4 giving this Commission the power to act as permitted by § 105.961.

#### COUNT VI

##### *Failure to Include an Accurate "Paid for by" Disclosure*

36. "Any person publishing, circulating, or distributing any printed matter relative to any candidate for public office or any ballot measure shall on the face of the printed matter identify in a clear and conspicuous manner the person who paid

for the printed matter with the words 'Paid for by' followed by the proper identification of the sponsor pursuant to this section." § 130.031.8, RSMo.

37. "[P]rinted matter" shall be defined to include any pamphlet, circular, handbill, sample ballot, advertisement, including advertisements in any newspaper or other periodical, sign, including signs for display on motor vehicles, or other imprinted or lettered material[.]" § 130.031.8, RSMo.

38. Section 130.031.8, RSMo, further states the following:

(2) In regard to any printed matter paid for by a committee, it shall be sufficient identification to print the committee as required to be registered by subsection 5 of section 130.021 and the name and title of the committee treasurer who was serving when the printed matter was paid for.

39. There is probable cause to believe that Respondents violated § 130.031.8, by distributing signs which failed to include an accurate "Paid for by" disclosure.

## 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 §§ 130.016, 130.021, 130.029.4, 130.031.8, 130.041.1(3)-(4), and 130.046.1(3), RSMo and pursuant to § 105.961.4, hereby **ORDERS**:

1. Prior to finalizing settlement, Respondents will be required to file and amend reports and statements with the Commission.

2. Respondents shall comply with all relevant sections of Chapter 130.
3. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$7,364.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$828.00 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.
4. Regardless of the stay in paragraph 3 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.
5. Respondents shall be jointly and severally liable for all fees imposed under this order.

### III.

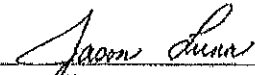
1. The parties understand the Missouri Ethics Commission will maintain this agreement as an open record of the Commission.
2. This agreement does not bind the Missouri Ethics Commission or restrict the remedies available concerning any violations not expressly detailed here, including any future violations.
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 536.037, 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.

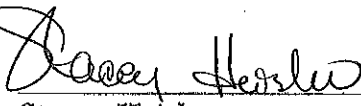
5. This agreement shall become effective immediately upon (1) the signature of all parties; (2) adoption of the Joint Proposed Findings of Fact, Conclusions of Law by the Missouri Ethics Commission; and (3) issuance of a Final Order by the Commission, without any further action of the parties.

SO AGREED:


RESPONDENTS JASON LUNA and  
CITIZENS TO ELECT JASON LUNA  
MONTGOMERY COUNTY CORONER

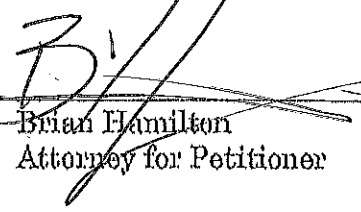
  
Jason Luna  
11/9/25  
Date

MISSOURI ETHICS COMMISSION

  
Stacey Heislen  
Executive Director  
11/26/2025  
Date

ATTORNEY FOR RESPONDENTS

  
Marc Ellinger  
Ellinger Bell  
25 Nov 25  
Date

  
Brian Hamilton  
Attorney for Petitioner  
11/26/25  
Date

BEFORE THE  
MISSOURI ETHICS COMMISSION

**Filed**

DEC 2 2025

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Respondents. )

Case No. 24-0047-I, 24-0074-I


**CONSENT ORDER**

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.016, 130.021, 130.029.4, 130.031.8, 130.041.1(3)-(4), and 130.046.1(3), 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 \$7,364.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$828.00 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.

SO ORDERED this 2<sup>nd</sup> day of December 2025,

A handwritten signature in cursive script, appearing to read "Jeremy B. Schneider".

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Jeremy Schneider, Chair  
Missouri Ethics Commission