

Filed

BEFORE THE
MISSOURI ETHICS COMMISSION

JAN 29 2026

Missouri Ethics
Commission

MISSOURI ETHICS)
COMMISSION,)
)
Petitioner,)
)
v.)
)
MADISON COUNTY)
DEMOCRATIC CLUB,) Case No. 24-0001-A
Continuing Committee,)
)
PAULA FRANCIS, Treasurer,)
)
and)
)
JANET SHOEMAKER, President,)
)
Respondents.)

JOINT FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND ORDER

The Missouri Ethics Commission ("MEC"), together with Madison County Democratic Club, Paula Francis, and Janet Shoemaker ("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. Madison County Democratic Club is a continuing committee established with the MEC on September 24, 2004.
2. Paula Francis was at all times relevant, treasurer for Madison County Democratic Club.
3. Janet Shoemaker was at all relevant times, president of Madison County Democratic Club.
4. 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.

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

COUNT I

Accepting Contributions and Making Expenditures Not Through the Official Fund Depository

6. In September of 2022, during the Marquand City Pioneer Days, Respondent Shoemaker accepted a \$500 cash contribution from Phillip Page. Prior to being deposited into the official depository account, \$420.00 were used to make related expenditures; the remaining amount of \$80 was later deposited into the account.

7. Of the \$420.00 used from the \$500.00 cash contribution received during the Marquand City Pioneer Days, the committee made approximately eleven non-itemized expenditures, totaling \$288.92, and a \$131.08 expenditure for printing, without first depositing the funds into the official depository account.

Report Name	Expenditure Name	Purpose	Amount	Date Paid
Not Reported	Lowe's	Supplies	\$36.66	9/14/22
Not Reported	Walmart	Supplies	\$4.65	9/20/22
Not Reported	Walmart	Supplies	\$14.88	9/22/22
Not Reported	Office Max	Supplies	\$7.08	10/1/22
Not Reported	USPS	Postage	\$35.20	10/3/22
Not Reported	Sam's Club	Supplies	\$37.92	10/3/22
Not Reported	Walmart	Supplies	\$26.40	10/4/22
Not Reported	USPS	Postage	\$13.20	10/5/22
Not Reported	Democrat News	Pamphlets	\$60.00	10/7/22
Not Reported	Walmart	Totes	\$21.82	10/9/22
Not Reported	Unknown	Pioneer Days	\$31.11	Unknown
Not Reported	Democrat News	Brochures	\$131.08	9/19/22
	Total		\$420.00	

Expenditures Made by A Party Other Than the Committee Treasurer

8. In 2022, Respondent Shoemaker made committee expenditures using all but \$80.00 of the \$500.00 contribution she accepted on behalf of the committee.

9. Respondent Shoemaker has never been considered treasurer or deputy treasurer of Madison County Democratic Club.

COUNT II

Cash contributions and cash expenditures in excess of limits.

10. In 2022, Respondents accepted a \$500.00 cash contribution from Phillip Page exceeding the \$100.00 allowable amount for each cash contribution received.

11. In 2022, Respondents made two cash expenditures to Democrat News totaling \$191.08, each exceeding the \$50.00 limit.

COUNT III

Failure to accurately report beginning and ending money on hand.

12. Respondents inaccurately reported the ending money on hand on the 2022 July Quarterly Report.

COUNT IV

Failure to timely file campaign finance disclosure reports.

13. Respondents failed to timely file thirteen Statements of Limited Activity and two full disclosure reports.

Report Name	Report Year	Due Date	Date Filed
January Quarterly Report - Limited Activity	2020	1/15/20	6/26/20
April Quarterly Report	2020	4/15/20	6/26/20
July Quarterly Report - Limited Activity	2020	7/15/20	8/24/20
October Quarterly Report - Limited Activity	2020	10/15/20	10/30/20
April Quarterly Report - Limited Activity	2021	4/15/21	5/22/21
July Quarterly Report - Limited Activity	2021	7/15/21	11/2/21
October Quarterly Report - Limited Activity	2021	10/15/21	11/2/21
January Quarterly Report - Limited Activity	2022	1/17/22	3/1/22

April Quarterly Report - Limited Activity	2022	4/15/22	5/10/22
July Quarterly Report	2022	7/15/22	8/15/22
October Quarterly Report - Limited Activity	2022	10/17/22	11/18/22
April Quarterly Report - Limited Activity	2023	4/17/23	2/9/24
July Quarterly Report - Limited Activity	2023	7/17/23	2/13/24
October Quarterly Report - Limited Activity	2023	10/16/23	3/5/24
January Quarterly Report - Limited Activity	2024	1/15/24	3/5/24

14. Respondents failed to file the 8 Day Before and the 30 Day After Reports for the November 8, 2022, general election.

COUNT V

Failure to timely and accurately report contributions.

15. Respondents failed to report two contributions, totaling \$120.00, and a \$387.00 deposit consisting of proceeds from raffle ticket sales during the Marquand City Pioneer Days.

Contributor Name	Amount	Date	Report w/o Contribution
Unknown	\$100.00	5/13/22	July Quarterly 2022
Unknown	\$20.00	10/13/22	April Quarterly 2023
Unknown	\$387.00	10/1/22	April Quarterly 2023
Total			\$1,007.00

16. Respondents failed to report a \$500.00 cash contribution received during the Marquand City Pioneer Days.

COUNT VI

Failure to timely and accurately report expenditures and contributions made.

17. Respondents failed to report eighteen expenditures totaling \$1,297.99.

Expenditure	Purpose	Amount	Date	Report w/o Expenditure
New Era Bank	Services charges	\$70.00	N/A	Jul Quarterly 2022
Marquand Pioneer Days	Vendor booth	\$35.00	8/8/22	Apr Quarterly 2023
Lowe's	Supplies	\$36.66	9/14/22	Apr Quarterly 2023
Walmart	Supplies	\$4.65	9/20/22	Apr Quarterly 2023
Walmart	Supplies	\$14.88	9/22/22	Apr Quarterly 2023
Office Max	Supplies	\$7.08	10/1/22	Apr Quarterly 2023
USPS	Postage	\$35.20	10/3/22	Apr Quarterly 2023

Sam's Club	Supplies	\$37.92	10/3/22	Apr Quarterly 2023
Walmart	Supplies	\$26.40	10/4/22	Apr Quarterly 2023
USPS	Postage	\$13.20	10/5/22	Apr Quarterly 2023
Democrat News	250 pamphlets	\$60.00	10/7/22	Apr Quarterly 2023
Walmart	Totes	\$21.82	10/9/22	Apr Quarterly 2023
Unknown	Pioneer Days expenses	\$31.11	Unk	Apr Quarterly 2023
Janet Shoemaker	Unknown	\$100.00	10/14/22	Apr Quarterly 2023
John Rauls	Kayak for raffle	\$242.99	8/8/22	Apr Quarterly 2023
Janet Shoemaker	Unknown	\$250.00	10/14/22	Apr Quarterly 2023
Democrat News	500 brochures	\$131.08	9/19/22	Apr Quarterly 2023
Democrat News	Political ad 10/26/22	\$180.00	10/19/22	Apr Quarterly 2023
	Total	\$1,297.99		

COUNT VII

Failure to maintain committee records in accordance with accepted normal bookkeeping procedures.

18. Respondents did not provide committee records necessary to verify some of the contributions that Respondents received and expenditures made.

CONCLUSIONS OF LAW

COUNT I

Accepting Contributions and Making Expenditures Not Through the Official Fund Depository

19. “[A]ll 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.” § 130.021.4(1), RSMo.

20. Where Respondents accepted a \$500.00 cash contribution; where Respondents made twelve expenditures totaling \$420.00, without first depositing the

funds into the official depository account, there is probable cause to believe Respondents violated § 130.021.4(1) giving this Commission the power to act as permitted under § 105.961.

Expenditures Made by A Party Other Than the Committee Treasurer

21. Except for expenditures from a petty cash fund, “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.” § 130.031.2, RSMo.

22. Where Respondents made expenditures by and through a party other than the committee’s treasurer, there is probable cause to believe Respondents violated § 130.031.2 giving this Commission the power to act as permitted under § 105.961.

COUNT II

Cash contributions and cash expenditures in excess of limits.

23. For purposes of Chapter 130, RSMo, cash means, “currency, coin, United States postage stamps, or any negotiable instrument which can be transferred from one person to another person without the signature or endorsement of the transferor.” § 130.011(4), RSMo.

24. “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 continuing committee[.]” § 130.031.1, RSMo.

25. “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.

26. Where Respondents received a cash contribution over \$100 and made two cash expenditures 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 accurately report beginning and ending money on hand.

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

28. Where Respondents failed to accurately report the ending money on hand on one report, there is probable cause to believe Respondents violated § 130.041.1(5) giving this Commission the power to act as permitted under § 105.961.

COUNT IV

Failure to timely file campaign finance disclosure reports.

29. Pursuant to § 130.046.1, all committees must file regular campaign finance disclosure reports at the following times:

- (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; and

- (3) Not later than the fifteenth day following the close of each calendar quarter.
30. Pursuant to § 130.046.5(2),

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 expenditure 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.

31. Where Respondents untimely filed fifteen reports, and failed to file two reports, there is probable cause to believe Respondents violated § 130.046, giving this Commission the power to act as permitted under § 105.961.

COUNT V

Failure to timely and accurately report contributions.

32. 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[.]

§ 130.041.1(3), RSMo.

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

COUNT VI

Failure to timely and accurately report expenditures and contributions made.

34. 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.

35. "A separate listing by full name and address of any committee including a candidate committee controlled by the same candidate for which a transfer of funds or a contribution in any amount has been made during the reporting period, together with the date and amount of each such transfer or contribution[.]" § 130.041.1(8), RSMo.

36. Where Respondents failed to report eighteen expenditures, there is probable cause to believe Respondents violated §§ 130.041.1(4) and 130.041.1(8), giving this Commission the power to act as permitted under § 105.961.

COUNT VII

Failure to maintain committee records in accordance with accepted normal bookkeeping procedures.

37. "The candidate, treasurer or deputy treasurer of a committee shall maintain accurate records and accounts on a current basis." §130.036.1, RSMo.

38. "The records and accounts shall be maintained in accordance with accepted normal bookkeeping procedures and shall contain the bills, receipts, deposit records, cancelled checks and other detailed information necessary to prepare and substantiate any statement or report required to be filed pursuant to this chapter." § 130.036.1, RSMo.

39. "All records and accounts of receipts and expenditures shall be preserved for at least three years after the date of the election to which the records pertain. Records and accounts regarding supplemental disclosure reports or reports not required pursuant to an election shall be preserved for at least three years after the date of the report to which the records pertain. Such records shall be available for

inspection by the campaign finance review board and its duly authorized representatives." § 130.036.8, RSMo.

40. There is probable cause to believe that Respondents violated §§ 130.036.1 and 130.036.8, by failing to maintain the committee's finance records in accordance with accepted normal bookkeeping procedures required under Chapter 130, RSMo.

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 §§ 130.021.4(1), 130.031, 130.036.1, 130.036.8, 130.041.1, and 130.046, 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 \$7,804, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$779 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:

RESPONDENTS
MADISON COUNTY DEMOCRATIC
CLUB AND PAULA FRANCIS

Paula Francis 12/20/25
Paula Francis Date

RESPONDENT JANET SHOEMAKER

Janet Shoemaker 12/20/2025
Janet Shoemaker Date

MISSOURI ETHICS COMMISSION

Stacey Heislen 1/29/2026
Stacey Heislen
Executive Director Date

Brian Hamilton 1/29/2026
Brian Hamilton
Attorney for Petitioner Date

Filed

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MISSOURI ETHICS COMMISSION

MISSOURI ETHICS
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Petitioner,

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MADISON COUNTY
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Continuing Committee,

Case No. 24-0001-A

PAULA FRANCIS, Treasurer,

and

JANET SHOEMAKER, President,

Respondents.

CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.021.4(1), 130.031, 130.036.1, 130.036.8, 130.041.1, and 130.046, 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 \$7,804, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$779 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 3rd day of February 2026,



Jeremy Schneider, Chair
Missouri Ethics Commission.