

BEFORE THE
MISSOURI ETHICS COMMISSION

Filed

JAN 29 2026

Missouri Ethics
Commission

MISSOURI ETHICS)
COMMISSION,)
)
Petitioner,)
)
v.)
)
MADISON COUNTY DEMOCRAT)
CENTRAL COMMITTEE,) Case No. 24-0002-A
Political Party Committee,)
)
and)
)
PAULA FRANCIS, Treasurer,)
)
Respondents.)

JOINT FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND ORDER

The Missouri Ethics Commission (“MEC”), together with Madison County Democrat Central Committee and Paula Francis (“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 Democrat Central Committee is a political party committee established with the MEC on December 17, 2007.
2. Paula Francis is listed as treasurer on the Statement of Committee Organization.
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 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

Failure to maintain an official depository account in the name of the committee.

5. Respondents listed New Era Bank located in Fredericktown, MO as the official depository account on their Statement of Committee Organization.
6. The committee's official deposit account at New Era Bank was closed prior to January 1, 2020.

7. Respondents did not amend their Statement of Committee Organization within twenty days of a change in official depository account.

COUNT II

Failure to timely file campaign finance disclosure reports.

8. Respondents failed to timely file the 2020 April Quarterly Report, for which late fees have been paid.
9. Respondents failed to timely file fourteen statements of limited activity.

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	8/12/20
July Quarterly Report - Limited Activity	2020	7/15/20	8/12/20
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 - Limited Activity	2022	7/15/22	8/15/22
October Quarterly Report - Limited Activity	2022	10/17/22	4/13/23
April Quarterly Report - Limited Activity	2023	4/17/23	3/5/24
July Quarterly Report - Limited Activity	2023	7/17/23	3/5/24
October Quarterly Report - Limited Activity	2023	10/16/23	3/5/24
January Quarterly Report - Limited Activity	2024	1/15/24	3/5/24

CONCLUSIONS OF LAW

COUNT I

Failure to maintain an official depository account in the name of the committee.

10. Pursuant to § 130.021.4(1), “every committee shall have a single official fund depository within this state which shall be a federally or state-chartered bank, a federally or state-chartered savings and loan association, or a federally or state-chartered credit union in which the committee shall open and thereafter maintain at least one official depository account in its own name.”

11. “A committee which has filed a statement of organization and has not terminated shall not be required to file another statement of organization, except that when there is a change in any of the information previously reported as required by subdivisions (1) to (8) of subsection 5 of this section an amended statement of organization shall be filed within twenty days after the change occurs, but no later than the date of the filing of the next report required to be filed by that committee by section 130.046.” § 130.021.7, RSMo.

12. The statement of organization shall contain “the name and mailing address of its depository, and the name and account number of each account the committee has in the depository.” § 130.021.5(6), RSMo.

13. Where Respondents closed the committee’s official depository account and failed to timely amend the Statement of Committee Organization to reflect the changes, there is probable cause to believe that Respondents violated §§ 130.021.4(1), 130.021.5(6), and 130.021.7, giving this Commission the power to act as permitted under § 105.961.

COUNT II

Failure to timely file campaign finance disclosure reports.

14. Pursuant to § 130.046.1, all committees must file regular campaign finance disclosure reports at the following times and for the following periods: (3) Not later than the fifteenth day following the close of each calendar quarter.

15. 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. 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.

16. Where Respondents untimely filed one report and failed to timely file fourteen statements of limited activity, there is probable cause to believe Respondents violated § 130.046, 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 §§ 130.021.4(1), 130.021.5(6), 130.021.7, 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 \$2,000, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$200 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:

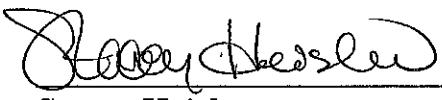
RESPONDENTS

MADISON COUNTY DEMOCRAT
CENTRAL COMMITTEE and PAULA
FRANCIS

 Paula Francis

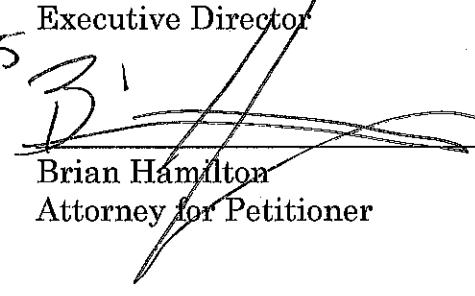
12-21-25
Date

MISSOURI ETHICS COMMISSION

 Stacey Heislen 1/29/2026

Stacey Heislen
Executive Director

Date

 Brian Hamilton
Attorney for Petitioner

1/29/26
Date

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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