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Missouri Ethics Commission

BEFORE THE
MISSOURI ETHICS COMMISSION

MISSOURI ETHICS COMMISSION, Petitioner, v. PLATTE COUNTY DEMOCRATIC CENTRAL COMMITTEE, and CODY "ALLAN" CLEMENTS, Treasurer, Respondents.	)	Case No. 26-0002-I

JOINT PROPOSED FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND CONSENT ORDER

The Missouri Ethics Commission ("MEC"), together with the Platte County Democratic Central Committee and its Treasurer, Cody "Allan" Clements, ("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 legal complaint, and submit themselves 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 enter into this agreement and agree 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. The Missouri Ethics Commission (MEC) is an agency of the State of Missouri established pursuant to § 105.955, RSMo, in part for the purpose of enforcing provisions of Chapter 130, RSMo.

2. The Platte County Democratic Central Committee is a political party committee registered with the MEC.

3. Cody "Allan" Clements is the committee's Treasurer.

4. Pursuant to §§ 105.957 and 105.961, RSMo, the MEC's staff investigated a complaint that was filed with the Commission and reported the investigation findings to the Commission.

5. The Commission determined there were reasonable grounds to believe violations of the law had occurred and authorized a hearing pursuant to § 105.961.3, RSMo.

6. The aggregate amount of all contributions received by the Platte County Democratic Central Committee in the 2024 calendar year was $42,001.

7. The aggregate amount of anonymous contributions accepted by the Platte County Democratic Central Committee in the 2024 calendar year was $3,316.

CONCLUSIONS OF LAW

1. Pursuant to § 130.031.5, RSMo: "[t]he maximum aggregate amount of anonymous contributions which shall be accepted in any calendar year by any committee shall be the greater of five hundred dollars or one percent of the aggregate amount of all contributions received by that committee in the same calendar year."

2. Section 130.031.5, RSMo also provides:

> If any anonymous contribution is received which causes the aggregate total of anonymous contributions to exceed the foregoing limitation, it shall be returned immediately to the contribution, if the contributor's identity can be ascertained, and, if the contributor's identity cannot be ascertained, the committee treasurer, deputy treasurer or candidate shall immediately transmit the anonymous contribution to the state treasurer to escheat to the state.

3. A contribution is considered "accepted" if it is not rejected and returned to the donor with ten business days after it is received. Section 130.036.2, RSMo.

4. There is probable cause to believe Respondent violated § 130.031.5, RSMo,

by receiving contributions in excess of $500 in the 2024 calendar year.

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 § 130.031.5, RSMo and pursuant to § 105.961.4, RSMo, hereby **ORDERS**:

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

2. In accordance with the provisions of § 130.031.5, RSMo, Respondents shall refund or escheat to the State of Missouri $2,816 of the anonymous contributions received in excess of the statutory cap in 2024.

3. Additionally, a fee is imposed against Respondents in the amount of $2,816; however, if Respondents pay $281 within 45 days of the date of the consent order, the remainder of the fee will be stayed.

4. Respondents are jointly and severally liable for the payment of this fee.

5. Regardless of the stay in paragraph 3, if there is probable cause to believe that any Respondent has committed any further violation of the campaign finance laws in Chapter 130, RSMo, within the two-year period from the date of this order, then the Respondent who committed the new violation will be required to pay the remainder of the fee. That remainder will be due immediately upon final adjudication of finding probable cause.

6. Fees will be paid by check or money order made payable to the Missouri Ethics Commission.

III.

The parties understand that the MEC will maintain this agreement as an open record of the Commission. This agreement does not bind the MEC or restrict the remedies available concerning any violations not expressly detailed here, including any future violations. Each party agrees to pay all their own fees and expenses incurred as a result of this case, its litigation, and/or its disposition.

Respondents, together with their heirs, assigns, agents, representatives and attorneys, do hereby waive, release, acquit and forever discharge the MEC, 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 § 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.

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

SO AGREED:

RESPONDENTS

PLATTE COUNTY DEMOCRATIC CENTRAL COMMITTEE

Cody Allan Clements 10-23-26

By Cody "Allan" Clements Date
Treasurer

CODY "ALLAN" CLEMENTS

Cody Allan Clements 10-23-26

Cody "Allan" Clements Date

Bradley J. Ketcher 11/2/26

Bradley J. Ketcher Date
Attorney for Respondents

PETITIONER

MISSOURI ETHICS COMMISSION

Stacey Heislen 11/3/26

Stacey Heislen Date
Executive Directors

Laura E Elsbury

Laura E Elsbury Date
Attorney for Petitioner

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Respondent who committed the new violation will be required to pay the remainder of the fee. That remainder will be due immediately upon final adjudication of finding probable cause.

6. Fees will be paid by check or money order made payable to the Missouri Ethics Commission.

SO ORDERED, this 12th day of November, 2026.

Julie Leicht, Chair
Missouri Ethics Commission