

BEFORE THE MISSOURI ETHICS COMMISSION

**CAMPAIGN FINANCE
COMPLAINT**

Date of Complaint:

Name of Complainant:

Address of Complainant:

Phone Number of Complainant:

Committees and Individuals Against
Whom Complaint is Brought:

Eigel for Missouri and Its Treasurer
Thomas R. Hughes
239 Fox Hill Road
St. Charles, MO 63301

Office Sought:

Governor

Nature of Complaint:

Campaign Finance Disclosure
Requirements In Chapter 130, Revised
Statutes of Missouri And Article VIII,
Section 23 of The Missouri Constitution

The matters alleged in this Complaint are not the subject of civil or criminal litigation, to the knowledge of the Complainant.

Violation 1: Excessive anonymous contributions

RSMO 130.031(5) limits aggregate anonymous contributions “in any calendar year” to “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.” It further states that all anonymous donations above that threshold “shall be returned immediately” or transmitted “immediately” to the state treasurer.

In 2023, Eigel reported accepting \$21,769.72 in anonymous contributions—\$21,369.72 on the July quarterly report and \$400 on the April quarterly report. This makes up 2.4% of Eigel for Missouri’s reported calendar year 2023 receipts of \$895,694.67, an amount that surpasses the 1% limit established by RSMO 130.031(5).

Violation 2: Over-the-limit contributions

The Missouri Constitution and the Revised Statutes of Missouri limit the amount of money that individuals may donate to candidates for statewide office. Effective January 1, 2023, candidates for the office of governor may accept contributions of up to \$2,825 per contributor.

Eigel’s reports during the 2024 cycle (2021-present) show that multiple individuals have donated sums in excess of this amount:

- David LaHay was reported to have donated \$5,800 on 5/27/23, along with 27 smaller donations totaling another \$181 in 2023 and 2024 (\$5,981 total).
- Michael Hafner was reported to have made two \$5,800 donations on 3/1/23 (\$11,600 total)
- Lindsay Murray was reported to have donated \$5,000 on 6/26/23
- Frances Malafronte was reported to have donated \$3,300 on 6/30/23, along with \$20 on 5/24/23, \$15 on 6/30/23, and \$10 on 6/30/23 (\$3,345 total).
- Herbert Baumann was reported to have donated \$2,900 on 6/22/23
- Joan Langenberg was reported to have donated \$1,000 on 5/23/23, \$2,800 on 6/29/23, \$1,000 on 9/11/23, and \$1,041.02 on 3/20/24. (Upon information or believe, Langenberg is widowed.) (\$5,841.02 total)
- John Moore was reported to have donated \$1,000 on 2/16/23, \$2,800 on 6/29/23, and \$1,500 on 1/15/24 (\$5,300 total).
- Doug Mueller was reported to have donated \$2,500 on 12/15/22, \$1,000 on 3/10/23 and \$2,100 on 6/26/23 (\$5,600 total)
- Joe Brazil was reported to have donated \$2,000 on 11/24/21, \$2,500 on 3/10/23, \$500 on 5/23/23, and \$250 on 6/29/23 (\$5,250 total)

- Vernon Hill was reported to have donated \$500 on 6/16/23, \$100 on 6/25/23, and \$2,825 on 9/12/23, \$100 on 2/13/24, \$100 on 3/13/24, \$100 on 3/27/24, and \$40 on 3/27/24. (\$3,765 total)
- Jeff Sanders/Jeff Sander/Jeff S Sanders was reported to have donated \$500 on 1/6/23, \$500 on 5/1/23, \$1,000 on 6/26/23, \$1,000 on 8/9/23, \$500 on 12/1/23, and \$1,561.52 on 3/7/24 (\$5,061.52 total).
- Shane Grasser was reported to have donated \$1,041.02 on 12/23/22, \$260.25 twice on 1/13/23, \$260.25 twice on 2/13/23, \$260.25 twice on 3/13/23, \$520.50 on 7/19/23, \$260.25 on 10/13/23, \$260.25 on 11/13/23, and \$260.25 on 12/13/23 (\$3,903.77 total)
- Joseph Cukjati was reported to have donated \$2,825 on 7/28/23 along with 8 other small donations totaling \$95 in May and June (\$2,920 total)
- Pamela Eash was reported to have donated \$2,825 on 8/21/23 and \$5 on 5/29/23 (\$2,830 total)
- Ron Parli / Ronald Parli was reported to have donated \$1,000 on 5/23/23, \$500 on 7/10/23, \$1,500 on 11/29/23, and \$1,000 on 3/29/24 (\$4,000 total).
- Thomas Hughes was reported to have donated \$2,500 on 5/2/22 and \$2,825 on 12/20/23 (\$5,325 total).
- Sandra Hea / M Sandra Hea was reported to have donated \$2,000 on 12/15/22, \$1,000 on 11/16/23, and \$1,000 on 3/8/24 (\$4,000 total).
- Michael Duffy / Mike Duffy was reported to have donated \$912.30 on 9/7/23, \$900 on 12/20/23, \$600 on 12/20/23, \$300 five times, and \$104.10 twelve times (\$5,161.50 total).
- Angela Williams /Angels Williams (same address) was reported to have made 36 separate donations totaling \$5,233, plus and \$1,650 donation on 1/4/24 (\$6,883 total).
- John Williams was reported to have donated \$1,000 on 2/14/22, \$1,000 on 5/1/23, \$500 on 7/1/23, and \$500 on 11/15/23 (\$3,000 total)
- Deborah Matush / Deb Matush was reported to have donated \$2,800 on 7/1/23 and \$2,825 on 3/29/24 (\$5,625 total)
- Harry Langenberg was reported to have donated \$1,000 on 11/15/23 and \$2,000 on 3/21/24 (\$3,000 total)
- The MO Coalition for Video Lottery PAC was reported to have donated \$2,400 on 9/19/22 and \$1,000 on 5/23/23 (\$3,400 total)
- The 1821 PAC was reported to have donated \$2,400 on 11/15/22 and \$2,825 on 9/19/23 (\$5,225 total)

There is no indication on Eigel's reports that the impermissible portion of these contributions have been returned or reattributed to a spouse.

For the contributions made by David LaHay, Frances Malafronte, John Moore, Doug Mueller, Joe Brazil, Michael Hafner, Vernon Hill, Jeff Sanders, Joseph Cukjati, Pamela Eash, Joan Langenberg, Shane Grasser, Ron Parli, Thomas Hughes, Sandra Hea,

Mike Duffy, Angela Williams, John Williams, the MO Coalition for Video Lottery PAC, and The 1821 PAC, the amount reported in the “aggregate to date” box on Eigel’s quarterly reports does not accurately reflect the aggregate, over-the-limit total of the donations. This is a violation of RSMO 130.041(2).

Eigel’s acceptance of over-the-limit contributions and improper aggregate donation calculations are violations of Missouri campaign finance law.

Summary

Taken together, these errors show more than sloppy and inaccurate record keeping and reporting. They suggest a fraudulent attempt inflate the amount of Eigel’s contributions by tens of thousands of dollars, thereby artificially boosting its publicly-reported cash-on-hand figures and providing Missourians with an inaccurate picture of Eigel’s fundraising.

I request an immediate investigation into the violations described above and any other issues that may arise during the course of the review.

VERIFICATION BY OATH OR AFFIRMATION

STATE OF MISSOURI)
) ss.
COUNTY OF _____)

I, _____, being duly sworn upon oath or affirmation legally administered, certify under penalty of perjury that the information contained in this Complaint is complete, true and correct, to the best of my knowledge and belief.

Complainant Signature

Subscribed and sworn to before me this _____ day of _____, 2024.

Notary Public

My Commission Expires: _____