

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI

**FILED**

JUL 30 2025

STATE OF MISSOURI,  
Plaintiff,

Cause No. *25SL-CL06207*

VS

OCN:

JOAN M. GILMER  
CIRCUIT CLERK, ST. LOUIS COUNTY

SAM PAGE  
White Non-Latino or Caucasian/Male  
DOB:  
SSN:  
41 South Central,  
Clayton, MO 63105

Defendant.

**INDICTMENT**

The Grand Jurors of the County of St. Louis, State of Missouri, charge that:

**COUNT I—COMMITTING CLASS FOUR ELECTION OFFENSE:  
PUBLIC FUNDS EXPENDITURE BY POLITICAL SUBDIVISION  
OFFICER OR EMPLOYEE**

Charge Code: 115.637-001N20205999.99

The defendant, in violation of Section 115.646, RSMo, committed the unclassified misdemeanor of Public Funds Expenditure by Political Subdivision Officer or Employee, punishable under Sections 115.646 and 115.637, RSMo, in that between February 24, 2025, and March 21, 2025, the defendant, in the County of St. Louis, State of Missouri, purposely expended public funds on a flyer to advocate the defeat, or oppose the passage, of a ballot measure on the April 8, 2025 ballot.

**COUNT II—COMMITTING CLASS FOUR ELECTION OFFENSE:  
PUBLIC FUNDS EXPENDITURE BY POLITICAL SUBDIVISION  
OFFICER OR EMPLOYEE**

Charge Code: 115.637-001N20205999.99

The defendant, in violation of Section 115.646, RSMo, committed the unclassified misdemeanor of Public Funds Expenditure by Political Subdivision Officer or Employee, punishable under Sections 115.646 and 115.637, RSMo, in that between March 10, 2025 and March 21, 2025, the defendant, in the County of St. Louis, State of

Missouri, purposely expended public funds on a postcard to advocate the defeat, or oppose the passage, of a ballot measure on the April 8, 2025 ballot.

**COUNT III—STEALING - \$25,000 OR MORE  
STEALING**

Charge Code: 570.030-034Y20232399.0

The defendant, in violation of Section 575.030, RSMo, committed the class C felony of Stealing by Deceit, punishable under Sections 558.002 and 558.011, RSMo, in that between March 10, 2025 and March 21, 2025, in the County of St. Louis, State of Missouri, the defendant appropriated postage of a value of at least twenty-five thousand dollars, which property was owned by St. Louis County, and defendant appropriated such property from St. Louis County and with the purpose to deprive St. Louis County thereof by deceit in that the defendant represented to St. Louis County that such expenditure was authorized, which representation was false and known by defendant to be false and St. Louis County relied on the representation and was thereby induced to part with such property.

**COUNT IV—STEALING - \$750 OR MORE  
STEALING**

Charge Code: 570.030-035Y2020399.0

The defendant, in violation of Section 575.030, RSMo, committed the class D felony of Stealing by Deceit, punishable under Sections 558.002 and 558.011, RSMo, in that between March 10, 2025, and March 20, 2025, in the County of St. Louis, State of Missouri, the defendant appropriated currency of at least seven hundred fifty dollars, which property was owned by St. Louis County, and defendant appropriated such property from St. Louis County and with the purpose to deprive St. Louis County thereof by deceit in that the defendant represented to St. Louis County that such expenditure was authorized, which representation was false and known by defendant to be false and St. Louis County relied on the representation and was thereby induced to part with such property.

A TRUE BILL

ANDREW BAILEY

Attorney General and Special  
Prosecuting Attorney of the County of  
St. Louis, State of Missouri, by

May D. Tracy

Goodwin # 65929

FOREPERSON

Gregory M. Goodwin  
Chief Counsel – Public Protection  
Missouri Bar #65929  
P.O. Box 899  
Jefferson City, MO 65102  
(573) 751-7017  
Gregory.Goodwin@ago.mo.gov

Received and filed this 30th day of July, 2025

WHEREFORE, the Attorney General requests that a summons be issued as provided by law.

☒ Summons to issue

☐ Warrant to issue, bond set as follows:

[Signature] Div. 13  
Judge P.J.

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**STATE WITNESSES:**

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