

Filed
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Missouri Ethics
Commission

Before the
Missouri Ethics Commission

MISSOURI ETHICS COMMISSION,)
)
 Petitioner,)
)
 v.) Case No. 09A274, 09E277, 09E301, and
) 12E077
)
 FREEDOM INCORPORATED,)
 a Continuing Committee,)
)
 Respondent.)

JOINT STIPULATION OF FACTS, WAIVER OF HEARING
BEFORE THE MISSOURI ETHICS COMMISSION, AND
CONSENT ORDER WITH JOINT PROPOSED
FINDINGS OF FACT AND CONCLUSIONS OF LAW

The undersigned parties jointly stipulate to the facts and consent to the action set forth below.

The undersigned Respondent further acknowledges that it is aware of the various rights and privileges afforded by law, including but not limited to: the right to appear and be represented by counsel; the right to have all charges against Respondent be proven upon the record by competent and substantial evidence; the right to cross-examine any witness appearing at the hearing against Respondent; the right to present evidence on Respondent's behalf at the hearing; and the right to a decision upon the record of the hearing. Being aware of these rights provided to Respondent by operation of law, the undersigned Respondent knowingly and voluntarily waives each and every one of these rights and freely enters into this Joint Stipulation of Facts, Waiver of Hearing before the Missouri Ethics Commission, and Consent Order with Joint Proposed Findings of Fact and Conclusions of Law, and agrees to abide by the terms of this document.

I.

Based upon the foregoing, the Petitioner and the undersigned Respondent jointly stipulate to the following and request that the Missouri Ethics Commission adopt as its own the Joint Proposed Findings of Fact and Joint Proposed Conclusions of Law, as follows:

JOINT PROPOSED FINDINGS OF FACT

1. The Missouri Ethics Commission (the "Commission") is an agency of the State of Missouri established pursuant to Section 105.955, RSMo, in part for the purpose of enforcing the provisions of Chapter 130, RSMo.

2. Freedom Incorporated is a continuing committee registered with Petitioner since July 14, 1994.

3. Freedom Incorporated is a not-for-profit corporation registered with the Missouri Secretary of State since April 27, 1962.

4. At all times prior to September 20, 2010, the following persons were officers of Freedom Incorporated: Craig Bland served as the President, Velda Cook served as the Secretary and the Registered Agent, and Eugene Standifer, Jr., served as the Treasurer.

5. From September 20, 2010, through May 12, 2011, Carl Evans replaced Eugene Standifer, Jr., as the Treasurer of Freedom Incorporated. Velda Cook continued as Secretary and Craig Bland continued as President.

6. On May 23, 2005, Respondent Freedom Incorporated filed an amended statement of committee organization reporting Douglass National Bank Account No. (hereinafter "Douglass Account") in the name of Freedom Inc., as its official fund depository account.

7. Under Section 130.026.5(1), RSMo, both Petitioner Commission and the Jackson County Board of Elections are the appropriate officers designated to receive campaign finance disclosure reports filed by Freedom Incorporated.

8. On October 5, 2009, the Commission informed Respondent Freedom Incorporated of an audit pursuant to Section 105.959, RSMo (Case 09A274), and the Commission received complaints on October 13, 2009 (Case 09E277), December 21, 2009 (09E301), and April 9, 2012 (12E077).

9. Respondent Freedom Incorporated is a party to all audits and complaints listed above.

10. Respondent Freedom Incorporated's former treasurer, Eugene Standifer, Jr., was a party to case number 09A274, as that case related to events that occurred on or before September 20, 2010, and case number 09E277. On October 5, 2012, Respondent Standifer passed away and is no longer a party to the case.

11. Pursuant to Sections 105.957, 105.959, and 105.961.1, RSMo, a special investigator has conducted an audit and investigation and reported findings to the Commission.

12. Based on those reports, the Commission determined that there are reasonable grounds to believe that violations of law had occurred, and it therefore authorized holding a hearing in this matter pursuant to Section 105.961.3, RSMo.

Count I – Official Fund Depository Accounts

13. Respondent maintained the Douglass Account as Freedom Incorporated's official fund depository account from December 4, 2004, through October 1, 2010. Eugene Standifer, Jr., James B. Wilson, Velda Cook and Craig Bland were official signers on the account.

14. Freedom Founders, Inc. is a not-for-profit corporation registered with the Missouri Secretary of State since August 19, 2008.

15. The Articles of Incorporation for Freedom Founders Inc. establish a “mutual benefit corporation” which is “organized and shall be operated to promote certain political issues to improve the health and general welfare and the economic and social vitality of the citizens of Kansas City, Missouri.”

16. Through September 20, 2010, the following persons were officers of Freedom Founders, Inc.: Craig Bland served as the President, Velda Cook served as the Secretary and was the registered agent, and Eugene Standifer, Jr. served as the Treasurer.

17. On October 20, 2008, Freedom Founders, Inc. opened Account No. _____ at Liberty Bank and Trust (hereinafter “Freedom Founders Liberty Account”). The aforementioned officers of Freedom Incorporated were designated as the signors on the Liberty Account.

18. Freedom Founders, Inc. did not register as a continuing committee with the Commission, and the Freedom Founders Liberty Account was not designated as an official fund depository account with the Commission by Respondent Freedom Incorporated.

19. Between October 20, 2008, and October 31, 2008, contributions to Freedom Incorporated were deposited into the Freedom Founders Liberty Account as follows:

- a. \$10,000 contribution from Citizens for Light Rail, deposited October 20, 2008;
- b. \$40,000 contribution from YES for Schools First Coalition, deposited October 20, 2008;
- c. \$7,500 contribution from Missourians for Quality Homecare, deposited October 20, 2008;

d. \$5,000 contribution from Citizens for Light Rail, deposited October 20, 2008; and

e. \$7,500 contribution from Missourians for Quality Homecare, deposited October 31, 2008.

20. On October 27, 2008, \$20,000 of these contributions were transferred from the Freedom Founders Liberty Account into Respondent Freedom Incorporated's Douglass Account.

21. On November 5, 2008, another \$4,000 of these contributions were transferred from the Freedom Founders Liberty Account into Respondent Freedom Incorporated's Douglass Account.

22. Another \$40,939.59 of these contributions were expended from the Freedom Founders Liberty Account on behalf of Freedom Incorporated and reported by Freedom Incorporated on their campaign finance disclosure reports.

23. Respondent Freedom Inc. and Eugene Standifer, Jr., failed to report the Freedom Founders Liberty Account as an official fund depository account of Respondent Freedom Inc.

Count II – Committee Treasurer and Deputy Treasurer

24. On the Statement of Committee Organization filed by Respondent on May 23, 2005, Respondent listed Respondent Standifer as the treasurer of Freedom Incorporated.

25. As set forth fully in the Commission's Order in MEC case number 11A070, the audit revealed that prior to September 20, 2010, the Secretary of Freedom Incorporated, Velda Cook, without Mr. Standifer's signature appearing thereon, was the sole signor on checks totaling \$4,023.96 from the Douglass Account, and again without Mr. Standifer's signature appearing thereon, Ms. Cook was the sole signor on checks totaling \$3,150 from the Freedom Founders Liberty Account.

26. In addition, the audit revealed that Velda Cook, who was neither the treasurer nor the deputy treasurer of Freedom Incorporated, was the sole signator on the following two checks totaling \$308 from the Freedom Incorporated account after September 20, 2010:

- a. \$176.00 check to the US Postal Service dated December 9, 2010; and
- b. \$132.00 check to the US Postal Service dated March 14, 2011.

Count III – Campaign Finance Reports

27. The aforementioned officers of Freedom Incorporated failed to file timely the following campaign finance disclosure reports:

Report	Due Date	Date Filed
July 2008 Quarterly	7/15/2008	7/17/2008
8 Day Primary 8/5/08	7/28/2008	5/7/2010
30 Day After Primary 8/5/08	9/4/2008	5/10/2010
8 Day Before General 11/4/08	10/27/2008	5/10/2010
30 Day General 11/4/08	12/4/2008	5/25/2010
April 2009 Quarterly	4/15/2009	5/26/2010
July 2009 Quarterly	7/15/2009	5/26/2010
October 2009 Quarterly	10/15/2009	5/26/2010
January 2010 Quarterly	1/15/2010	5/26/2010
8 Day Primary 4/6/10	3/29/2010	5/29/2010
April 2010 Quarterly	4/15/2010	5/29/2010
30 Day After 4/6/10	5/6/2010	6/7/2010
24 Hour Expenditure	7/24/2010	7/26/2010
24 Hour Expenditure	7/29/2010	7/30/2010

28. Respondent Freedom Incorporated did not report its money on hand correctly on the “8 Day Before” report for the 2008 primary election and the “30 Day After” 2008 general election reports.

Count IV – Contributions Received

29. Prior to September 20, 2010, Respondent failed to report forty-seven contributions totaling \$53,957.48. As a condition of entering into this Joint Stipulation, Respondent Freedom Incorporated has amended its campaign finance disclosure reports to include those fifty contributions received as set forth at **Appendix A**, which is incorporated herein by reference.

30. Prior to September 20, 2010, Respondent failed to report the employer and/or address for twenty-one contributors, contributing a total of \$49,500. As a condition of entering into this Joint Stipulation, Freedom Incorporated has amended its campaign finance disclosure reports to include employer and address information for those twenty-one contributors.

31. Prior to September 20, 2010, Respondent failed to report the aggregate amounts contributed for thirty-nine contributors, totaling \$35,250 in contributions. As a condition of entering into this Joint Stipulation, the campaign finance disclosure reports have been amended to include aggregate amounts contributed by all contributors not originally included in the campaign finance disclosure report.

32. Between July 2008 and October 2010, Freedom Incorporated received an aggregate of \$5,318.99 in contributions of \$100 or less per contributor, but Respondent reported \$4,205 in such contributions. As a condition of entering into this Joint Stipulation, Respondent Freedom Incorporated has amended its campaign finance disclosure reports to include the aggregate amount of contributions of \$100 or less per contributor as follows:

Report	Originally Reported	Correct Amount
July 2008 Quarterly	\$1,345.00	\$1,620.00
8 Day Before Primary 2008	\$675.00	\$320.00
8 Day Before General 2008	\$0.00	\$200.00
October 2009 Quarterly	\$750.00	\$1,250.00
8 Day Before General	\$860.00	\$360.00

Report	Originally Reported	Correct Amount
April 2010 Quarterly	\$100.00	\$243.99
July 2010 Quarterly	\$250.00	\$600.00
24 Hour Primary	\$0.00	\$300.00
30 Day After Primary	\$225.00	\$375.00
October 2010 Quarterly	\$0.00	\$50.00
TOTAL	\$4,205.00	\$5,318.99

33. Between November 3, 2010, and February 14, 2011, Respondent Freedom Incorporated did not report \$3,325 in contributions, as follows.

Date	Item	Contributor	Amount	Should have been reported:
11/3/2010	11516	Missouri Democratic State Committee	\$2,000.00	30 Day After General Election
11/30/2010	3032	G H Consulting LLC	\$500.00	30 Day After General Election
2/14/2011	1890	WGAFLLC	\$325.00	8 Days Before General Election
2/14/2011	143	IDGAG LLC	\$400.00	8 Days Before General Election
		Total	\$3,325.00	

34. Between October 2010 and January 2011, Respondent Freedom Incorporated inaccurately reported the amount of the following contributions received that were deposited into the Douglass Account and that were \$100.00 or less from a single contributor.

Report	Amount Reported	Correct Amount	Difference
8 Days Before General – 10/25/2010	\$100.00	\$50.00	
30 Days After General- 11/29/2010	\$80.00	\$625.00	
40 Day Before Primary 1/16/2011	\$405.00	\$205.00	
Total	\$585.00	\$880.00	\$295.00

Count V – Expenditures and Contributions Made

35. Prior to September 20, 2010, Respondent failed to report twenty expenditures totaling \$5,144.33. As a condition of entering into this Joint Stipulation, the campaign finance disclosure reports have been amended to include those expenditures as set forth at **Appendix B**, which is incorporated herein by reference.

36. Prior to September 20, 2010, Respondent reported eighteen expenditures, totaling \$2,779.66, that could not be identified as coming from Freedom Incorporated’s Douglass Bank account.

37. Prior to September 20, 2010, Respondent failed to include the purpose, date, and/or address of the recipient of the expenditure for one-hundred thirty-eight expenditures totaling \$93,289.53. As a condition of entering into this Joint Stipulation, Respondent Freedom Incorporated has amended its campaign finance disclosure reports to include the purpose, date, and address of recipients of expenditures greater than \$100 as set forth at **Appendix C**, which is incorporated herein by reference.

38. Prior to September 20, 2010, Respondent reported four expenditures, totaling \$2,151.85, on two separate campaign finance disclosure reports, resulting in a double reporting of those expenditures. As a condition of entering into this Joint Stipulation, Respondent Freedom Incorporated has amended its campaign finance disclosure reports so that these four expenditures are reported on only one report.

39. In February 2011, Respondent Freedom Incorporated failed to report the following \$127.99 in expenditures:

Date	Item Number	Recipient	Amount	Should have been reported:
2/8/2011	1515	Rodney Bland	\$20.46	8 Days Before Primary

Date	Item Number	Recipient	Amount	Should have been reported:
2/8/2011	1516	Dwon Littlejohn	\$89.71	8 Days Before Primary
2/9/2011	1519	Dwon Littlejohn	\$17.82	8 Days Before Primary
		Total	\$127.99	

40. In February 2011, Respondent Freedom Incorporated reported the following \$1,156.81 in expenditures that do not appear on bank statements for the Douglass Bank account:

Date	Payee	Amount
	Supplies	\$127.99
2/20/2011	Family Dollar	\$28.82
2/22/2011	Orissa Kelley Logan	\$1,000.00
	Total	\$1,156.81

Count VI – Campaign Workers

41. On the July 2008 quarterly report, Respondent included a reported expenditure for \$4,180 that was reported as “worker and other.” As a condition of entering into this Joint Stipulation, Respondent Freedom Incorporated has amended its campaign finance disclosure reports so that this \$4,180 expenditure for campaign workers is reported in an itemized manner, including the name, address, date, amount, and purpose of each payment and the aggregate amount paid to each worker as set forth at **Appendix D**, which is incorporated herein by reference.

42. Prior to September 20, 2010, Respondent failed to report the aggregate amount paid to each worker for two-hundred and sixty-nine campaign workers. As a condition of entering into this Joint Stipulation, Respondent Freedom Incorporated has amended its campaign finance disclosure reports to include the aggregate amount paid to those campaign workers.

43. On the 30 Day After April 2011 report, Respondent Freedom Incorporated failed to itemize by name, address, date, amount, and purpose of each payment and the aggregate amount paid to each worker as set forth at **Appendix E**, which is incorporated herein by reference.

Count VII – Consulting Services

44. Respondent reported on the July 2010 quarterly report one expenditure to Freedom Incorporated member Gail McCann Beatty in the amount of \$525 was reported but did not include the specific service or services provided and did not include the purpose of the payment. As a condition of entering into this Joint Stipulation, the campaign finance disclosure report has been amended to include the specific service(s) and purpose of that payment.

45. Respondent Freedom Incorporated reported on the 8 Day Before 2011 General Election report one expenditure to Carol Coe in the amount of \$500 without identifying the specific service or services provided and without describing the purpose of that payment. As a condition of entering into this Joint Stipulation, the campaign finance disclosure report has been amended to include the specific service(s) and purpose of that payment.

Count VIII – Direct Expenditures

46. Between October 2009 and July 2010, Freedom Incorporated spent \$11,408.99 to run ads that support candidates and ballot measures, but the specific candidates and ballot measures that were supported were not included in Freedom Incorporated's campaign finance disclosure reports. As a condition of entering into this Joint Stipulation, Respondent Freedom Incorporated has amended its campaign finance disclosure reports so that the candidates and ballot measures supported by each expenditure have been reported in a supplemental "Direct Expenditure" report for each of the following payments:

Date	Payee	Check purpose	Amount	Disclosure Report Purpose
10/30/2009	The Call	Ad	\$1,000.00	Advertising
11/3/2009	Cambridge Consultants	none	\$1,974.63	Radio Ads
11/4/2009	Carter Broadcasting	none	\$2,200.00	Advertising
4/2/2010	The Call	none	\$1,050.00	Advertising
4/5/2010	The Globe	none	\$497.70	Advertising
7/27/2010	Cambridge Consultants	Printing	\$4,686.66	Print/Mail
		TOTAL	\$11,408.99	

47. In February and March 2011, Respondent Freedom Incorporated spent \$18,030.03 to run ads that support candidates and ballot measures, but the specific candidates and ballot measures that were supported were not included in Freedom Incorporated's campaign finance disclosure reports. As a condition of entering into this Joint Stipulation, Respondent Freedom Incorporated has amended its campaign finance disclosure reports so that the candidates and ballot measures supported by each expenditure have been reported in a supplemental "Direct Expenditure" report for each of the following payments:

Date	Payee	Amount	Reported Purpose
2/11/2011	Carter Broadcasting	\$4,080.00	Advertising
2/18/2011	CMI Computer	\$1,681.50	Services- Postage for Voter Guide
2/17/2011	KC Globe	\$2,389.42	Advertisement
2/23/2011	Cambridge Consultants	\$4,706.11	Advertisement
2/17/2011	KC Call	\$4,200.00	Advertisement
3/3/2011	Service Printing	\$623.00	Printing
3/17/2011	Hispanic News	\$350.00	Advertisement
	TOTAL	\$18,030.03	

48. Respondent Freedom Incorporated reported the following two expenditures on its 30 Day After April Election 2011 report:

- a. \$350 to Messenger Ink; and
- b. \$1,000 to Service Printing and Graphics, Inc.

49. For these two expenditures, Respondent Freedom Incorporated did not disclose the specific candidates and ballot measures that were supported when Respondent Freedom Incorporated incurred these expenses. As a condition of entering into this Joint Stipulation, Respondent Freedom Incorporated has amended its campaign finance disclosure reports so that the candidate and ballot measures supported by each expenditure have been reported in a supplemental "Direct Expenditure" report.

Count IX – Personal Use and Expenditures Not Through the Official Fund Depository

50. The Commission's audit revealed that nineteen (19) payments totaling \$9,571.74 were made to the committee's treasurer, Velda Cook.

51. As set forth fully in the Commission's Order in MEC case number 11A070, the audit revealed that the secretary of Freedom Incorporated, Velda Cook, received fourteen payments totaling \$7,261.84, some of which Ms. Cook converted to personal use.

52. To the extent the payments were not converted to personal use, they constituted expenditures that were improperly made because they were not made through Freedom Incorporated's official fund depository.

53. The officers of Respondent Freedom Incorporated did not request from Ms. Cook a detailed account of each expenditure within five days of the expenditure being made. Ms. Cook never provided receipts or invoices for these nineteen payments to officers of Respondent Freedom Incorporated.

CONCLUSIONS OF LAW

Count I – Official Fund Depository Accounts

54. According to Section 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.

55. According to Section 130.021.5 RSMo, in pertinent part:

The treasurer or deputy treasurer acting on behalf of any person or organization or group of persons which is a committee by virtue of the definitions of committee in section 130....shall file a statement of organization with the appropriate officer within twenty days after the person or organization becomes a committee ... The statement of organization shall contain the following information:

...

(6) The name and mailing address of its depository, and the name and account number of each account the committee has in the depository...

56. According to Section 130.021.7, RSMo:

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.

57. There is probable cause to believe Respondent received contributions and made expenditures through the Freedom Founders Liberty Account, which was not an official fund depository account of Respondent Committee, failed to report the Freedom Founders Liberty Account as an official fund depository account of Respondent Freedom Inc., and that Respondent did so knowingly, in violation of Sections 130.021.4(1), 130.021.5, and 130.021.7, RSMo.

Count II – Committee Treasurer and Deputy Treasurer

58. According to Section 130.021.5(3), RSMo, each committee must file a Statement of Committee Organization containing the name, mailing address and telephone number of the committee treasurer and also its deputy treasurer (if any).

59. According to Section 130.021.4(1) RSMo:

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.

60. According to Section 130.031.2, RSMo:

Except for expenditures from a petty cash fund which is established and maintained by withdrawals of funds from the

committee's depository account and with records maintained pursuant to the record-keeping requirements of section 130.036 to account for expenditures made from petty cash, 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.

61. There is probable cause to believe that prior to September 20, 2010, Respondent made expenditures totaling \$7,173.96 from the Douglass Account through Velda Cook and Craig Bland; that between December 2010 and March 2011, Respondent made two such expenditures totaling \$308 through Velda Cook and Craig Bland; that such expenditures were made when neither Velda Cook nor Craig Bland were the named treasurer or deputy treasurer, and that Respondent did so knowingly, in violation of Sections 130.021.5(3), 130.021.4(1), and 130.031.2, RSMo.

Count III – Campaign Finance Reports

62. According to Section 130.046.1, RSMo, Respondent was required to file the following campaign finance disclosure reports:

The disclosure reports required by section 130.041 for all committees shall be filed at the following times and for the following periods:

(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.

63. According to Section 130.046.3, RSMo, a continuing committee which makes aggregate expenditures, other than contributions to a committee, of \$500.00 or more, within the reporting period must file a 24-Hour Expenditure report after aggregate expenditures of \$250.00 or more are made after the twelfth day before the election.

64. There is probable cause to believe that Respondent failed to timely file fourteen (14) campaign finance disclosure reports as listed in paragraph 27, and failed to accurately report the money on hand on two campaign finance disclosure reports as listed in paragraph 28, and that Respondent did so knowingly, in violation of Sections 130.041.1, and 130.046.3, RSMo.

Count IV – Contributions Received

65. According to Section 130.041.1, RSMo:

Except as provided in subsection 5 of section 130.016, the candidate, if applicable, treasurer or deputy treasurer of every committee which is required to file a statement of organization, shall file a legibly printed or typed disclosure report of receipts and expenditures. The reports shall be filed with the appropriate officer designated in section 130.026 at the times and for the periods prescribed in section 130.046. Except as provided in sections

130.049 and 130.050, each report shall set forth:

...

(3) 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...

...

(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;

66. There is probable cause that prior to September 2010, Respondent failed to timely and accurately report forty-seven contributions totaling \$53,957.48, failed to include the employer and/or address information for twenty-one contributions totaling \$49,500.00, failed to include the aggregate amount contributed and/or date for thirty-nine contributions totaling \$35,250, and inaccurately reported the aggregate amount of contributions received \$100 or less from a single contributor on ten reports; that between November 2010 and February 2011, Respondent failed to report \$3,325 in contributions; and that between October 2010 and January 2011, Respondent inaccurately reported the aggregate amount of contributions under \$100 from a single contributor; and that Respondent did so knowingly, in violation of Section 130.041.1(3), RSMo.

Count V – Expenditures and Contributions Made

67. Section 130.041.1(4), RSMo requires that expenditure be reported as follows:

(4) Expenditures for the period, including:

...

(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.

68. There is probable cause to believe that prior to September 20, 2010, Respondent failed to report \$5,144.33 in expenditures, reported \$2,779.66 in expenditures that could not be identified as expended from the committee's official fund depository, failed to include the purpose, date and/or addresses of one hundred thirty eight (138) expenditures of \$100 or more totaling \$93,289.53, and double-reported four expenditures totaling \$2,151.85; that in February 2011, Respondent failed to report \$127.99 in expenditures, and reported \$1,156.81 in expenditures that could not be identifies as expended from the committee's official fund depository; and that Respondent did so knowingly, in violation of Section §130.041.1(4), RSMo.

Count VI – Campaign Workers

69. Section 130.041.1(4)(d) RSMo requires that expenditures to campaign workers be reported with 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.

70. There is probable cause that prior to September 20, 2010, Respondent failed to itemize \$4,180.00 in expenditures to campaign workers on the July 2008 Quarterly report,

including the name, address, date, amount and purpose of each payment and the aggregate amount paid to each such worker, and failed to include the aggregate amount of expenditures for two hundred sixty-nine (269) campaign workers to whom expenditures totaling \$20,727.88 were made, and that Respondent did so knowingly, in violation of Section 130.041.1(4)(d), RSMo.

Count VII – Consulting Services

71. According to Section 130.041.4, RSMo:

The words "consulting or consulting services, fees, or expenses", or similar words, shall not be used to describe the purpose of a payment as required in this section. The reporting of any payment to such an independent contractor shall be on a form supplied by the appropriate officer, established by the ethics commission and shall include identification of the specific service or services provided including, but not limited to, public opinion polling, research on issues or opposition background, print or broadcast media production, print or broadcast media purchase, computer programming or data entry, direct mail production, postage, rent, utilities, phone solicitation, or fund raising, and the dollar amount prorated for each service.

72. There is probable cause that prior to September 20, 2010, Respondent failed to file the required independent contractor expenditure report for a payment to an independent contractor in the amount of \$525.00 on the July 2010 Quarterly Report, that Respondent failed to file the required independent contractor expenditure report for a payment to an independent

contractor in the amount of \$500 on the 30 Day After 2011 report, and that Respondent did so knowingly, in violation of Section 130.041.4, RSMo.

Count VIII – Direct Expenditures

73. Under Section 130.041.1(7),
Except as provided in subsection 5 of section 130.016, the candidate, if applicable, treasurer or deputy treasurer of every committee which is required to file a statement of organization, shall file a legibly printed or typed disclosure report of receipts and expenditures. The reports shall be filed with the appropriate officer designated in section 130.026 at the times and for the periods prescribed in section 130.046. Except as provided in sections 130.049 and 130.050, each report shall set forth:

...

(7) The amount of expenditures for or against a candidate or ballot measure during the period covered and the cumulative amount of expenditures for or against that candidate or ballot measure, with each candidate being listed by name, mailing address and office sought. For the purpose of disclosure reports, expenditures made in support of more than one candidate or ballot measure or both shall be apportioned reasonably among the candidates or ballot measure or both. In apportioning expenditures to each candidate or ballot measure, political party committees and continuing committees need not include expenditures for maintaining a permanent office,

such as expenditures for salaries of regular staff, office facilities and equipment or other expenditures not designed to support or oppose any particular candidates or ballot measures; however, all such expenditures shall be listed pursuant to subdivision (4) of this subsection;

74. There is probable cause that prior to September 20, 2010, Respondent made expenditures directly in support of candidates and/or ballot measures without fully disclosing on the required direct expenditure report the name of the candidate or the ballot measure, that in February and March 2011, Respondent made seven expenditures totaling \$18,030.03 directly in support of candidates and/or ballot measures without fully disclosing the name of the candidate or the ballot measure, that Respondent reported two expenditures totaling \$1,350 on its 30 Day After 2011 Election directly in support of candidates and/or ballot measures without fully disclosing the name of the candidate or the ballot measure, and that Respondent did so knowingly, in violation of Section 130.041.1(7), RSMo.

Count IX – Personal Use and Expenditures Not Through the Official Fund Depository

75. Contributions as defined in section 130.011, received by any committee shall not be converted to any personal use. § 130.034.1, RSMo.

76. Contributions may be used for any purpose allowed by law including, but not limited to:

- (1) Any ordinary expenses incurred relating to a campaign;
- (2) Any ordinary and necessary expenses incurred in connection with the duties of a holder of elective office;
- (3) Any expenses associated with the duties of candidacy or of

elective office pertaining to the entertaining of or providing social courtesies to constituents, professional associations, or other holders of elective office;

(4) The return of any contribution to the person who made the contribution to the candidate or holder of elective office;

(5) To contribute to a political organization or candidate committee as allowed by law;

(6) To establish a new committee as defined by this chapter;

(7) To make an unconditional gift which is fully vested to any charitable, fraternal or civic organizations or other associations formed to provide for some good in the order of benevolence, if such candidate, former candidate or holder of elective office or such person's immediate family gain no direct financial benefit from the unconditional gift;

§ 130.034.2, RSMo.

77. In addition, “expenditures shall not be made by a committee except by or through an official depository account and the committee treasurer, deputy treasurer or candidate.

Contributions received by a committee shall not be commingled with any funds of an agent of the committee, a candidate or any other person.” § 130.021.4(1), RSMo.

78. Finally, under Section 130.036.1, RSMo:

The candidate, treasurer or deputy treasurer of a committee shall maintain accurate records and accounts on a current basis. The records and accounts shall be maintained in accordance with

accepted normal bookkeeping procedures and shall contain the bills, receipts, deposit records, canceled checks and other detailed information necessary to prepare and substantiate any statement or report required to be filed pursuant to this chapter. Every person who acts as an agent for a committee in receiving contributions, making expenditures or incurring indebtedness for the committee shall, on request of that committee's treasurer, deputy treasurer or candidate, but in any event within five days after any such action, render to the candidate, committee treasurer or deputy treasurer a detailed account thereof, including names, addresses, dates, exact amounts and any other details required by the candidate, treasurer or deputy treasurer to comply with this chapter. Notwithstanding the provisions of subsection 4 of section 130.021 prohibiting commingling of funds, an individual, trade or professional association, business entity, or labor organization which acts as an agent for a committee in receiving contributions may deposit contributions received on behalf of the committee to the agent's account within a financial institution within this state, for purposes of facilitating transmittal of the contributions to the candidate, committee treasurer or deputy treasurer. Such contributions shall not be held in the agent's account for more than five days after the date the contribution was received by the agent, and shall not be transferred to the account of any other agent or person, other than

the committee treasurer.

79. There is probable cause to believe that Respondent made expenditures indirectly through an individual rather than directly through the committee's official fund depository, failed to request or maintain adequate records supporting those expenditures, and allowed committee contributions to be converted to personal use in violation of Sections 130.034.1, 130.034.2, and 130.021.4(1), RSMo.

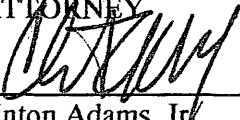
II.

Based on the foregoing, the parties hereto mutually agree and stipulate that the following shall constitute the order entered by the Missouri Ethics Commission in this matter. This order will be effective immediately upon the issuance of the Consent Order of the Missouri Ethics Commission without further action by any party.

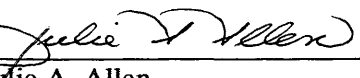
1. Respondent agrees to comply with all relevant sections of Chapter 130, RSMo.
2. It is the Order of the Missouri Ethics Commission that a fee is imposed against Respondent in the amount of \$175,000 pursuant to Section 105.961.4(6), RSMo. However, if Respondent pays \$9,500 of that fee within 45 days after the date of the Order, the remainder of the fee will be stayed for two years, subject to the provisions below. The fee will be paid via check or money order made payable to the Missouri Ethics Commission and sent to the Missouri Ethics Commission.
3. If Respondent commits any future violations of the campaign finance laws under Chapter 130, RSMo, during the two year stay, then Respondent will be required to pay the remainder of the fee. The fee will be due immediately upon final adjudication finding that Respondent has committed such a violation.
4. The parties consent to the entry of record and approval of this Joint Stipulation and to the termination of any further proceedings before the Commission based upon the Complaint filed by the Petitioner in the above actions.
5. Respondent, together with its heirs, successors and assigns, does hereby waive, release, acquit and forever discharge the Missouri Ethics Commission and its attorneys of or from any liability, claim, actions, causes of action, fees, costs and expenses, and compensation, including but not limited to, a claim for attorney's fees whatsoever which Respondent and


Respondent's attorneys now have or which they may hereafter have, which are based upon or arise out of the above cases.

RESPONDENT FREEDOM
INCORPORATED BY AND THROUGH
ITS ATTORNEY

By:  10-22-12
Clinton Adams, Jr. Date
Attorney for Respondent Freedom
Incorporated

PETITIONER MISSOURI ETHICS
COMMISSION

By:  10/25/12
Julie A. Allen Date
Executive Director

By:  10/25/12
Curt Stokes Date
Attorney for Petitioner

Appendix A

Contributions not reported by Respondent prior to September 20, 2010

Date	Item	Contributor	Amount	Correct Report
1/24/2008	6184	Annemarie Jackson	\$50.00	April 2008 Quarterly
1/24/2008	1686	Committee to Elect Yvonne Wilson	\$200.00	April 2008 Quarterly
1/24/2008	9284	Gayle Holliday	\$50.00	April 2008 Quarterly
1/24/2008	1865	R. Lowe	\$50.00	April 2008 Quarterly
1/25/2008	9809	Cynthia Canady	\$50.00	April 2008 Quarterly
1/25/2008	1342	Ronald Finley	\$50.00	April 2008 Quarterly
2/1/2008	8219	Eugene Standifer	\$50.00	April 2008 Quarterly
2/4/2008	1255	Curls at Large	\$200.00	April 2008 Quarterly
2/4/2008	2828	Curtis/Virginia Jones	\$50.00	April 2008 Quarterly
2/4/2008	8469	GH/JM Coates	\$50.00	April 2008 Quarterly
2/4/2008	2350	Leonard Graham	\$50.00	April 2008 Quarterly
2/5/2008	1256	Curls at Large	\$100.00	April 2008 Quarterly
2/6/2008	4138	Fred Curls	\$50.00	April 2008 Quarterly
2/7/2008	2652	Donovan Mouton	\$50.00	April 2008 Quarterly
2/7/2008	8784	Virginia/Dennis Evans	\$50.00	April 2008 Quarterly
2/9/2008	1889	R.D. James	\$50.00	April 2008 Quarterly
2/14/2008	4120	Clinton Adams	\$50.00	April 2008 Quarterly
2/15/2008	4145	M C Richardson	\$50.00	April 2008 Quarterly

Date	Item	Contributor	Amount	Correct Report
2/19/2008	39002	Cathy Brown	\$50.00	April 2008 Quarterly
2/20/2008	4441	Duane Harvey Funeral Directors	\$50.00	April 2008 Quarterly
2/22/2008	1356	E L Pendleton	\$50.00	April 2008 Quarterly
2/25/2008	801004953	Aasem Bahaegadeen (m.o.)	\$50.00	April 2008 Quarterly
2/26/2008	1133	L. Littlejohn	\$25.00	April 2008 Quarterly
2/27/2008	1032	Bennie Lewis & Assoc.	\$50.00	April 2008 Quarterly
2/27/2008	2031	Nelson/Cheryl Thompson	\$50.00	April 2008 Quarterly
2/28/2008	11882748508	Keith Martin Thomas (m.o.)	\$50.00	April 2008 Quarterly
2/29/2008	1261	Curls at Large	\$200.00	April 2008 Quarterly
2/29/2008	1168	Curls Judge Joseph Property Group	\$50.00	April 2008 Quarterly
3/1/2008	3058	Committee to Elect Helen Ragsdale	\$50.00	April 2008 Quarterly
3/17/2008	10613	David A. Smith	\$100.00	April 2008 Quarterly
3/18/2008	6786	Peter/Joan Yelorda	\$50.00	April 2008 Quarterly
3/31/2008	1043	Breathe Easy K.C. Committee	\$10,000	April 2008 Quarterly
4/3/2008	1034	Committee for Comprehensive Transit	\$8,500	July 2008 Quarterly
6/2/2008	1096	Committee to Elect Shalonn Kiki Curls	\$200.00	July 2008 Quarterly
7/22/2008	8003	Ameristar Casino	\$1,500	8 Day Before Primary
9/19/2008	1020	Citizens for Light Rail	\$10,000	October 2008 Quarterly

Date	Item	Contributor	Amount	Correct Report
9/22/2008	9114500686	UNKNOWN (Cashier's Check 9114 Armour)	\$10,619.48	October 2008 Quarterly
10/7/2008	1449	Missourians for Koster	\$10,000.00	8 Day Before General
3/17/2009	1797	Committee to Elect Yvonne Wilson	\$200.00	July 2009 Quarterly
7/17/2009	CASH	CASH	\$163.00	October 2009 Quarterly
3/11/2010	1314	Committee to Elect Shalonn Kiki Curls	\$200.00	8 Day Before General
3/11/2010	2488	Committee to Elect Sharon Sanders Brooks	\$200.00	8 Day Before General
7/27/2010	1214	Alfred Jordan	\$50.00	24 Hour Report
7/29/2010	2912162	Keith Martin Thomas (m.o.)	\$50.00	24 Hour Report
7/29/2010	3794	Tilmon Stewart	\$50.00	24 Hour Report
7/30/2010	9890	Gayle Holliday	\$100.00	24 Hour Report
7/30/2010	2149	Craig Bland	\$50.00	24 Hour Report
		TOTAL	\$53,957.48	

Appendix B

Expenditures not reported by Respondent prior to September 20, 2010

Date	Item	Payee/Description	Amount	Correct Report	Account
1/31/2008	Bank Charge	Service Charge	\$1.20	April 2008 Quarterly	Douglass Account
2/28/2008	Bank Charge	Service Charge	\$.90	April 2008 Quarterly	Douglass Account
2/28/2008	Bank Charge	Service Charge	\$10.00	April 2008 Quarterly	Douglass Account
2/29/2008	Bank Charge	Service Charge	\$.30	April 2008 Quarterly	Douglass Account
3/11/2008	3248	Juanita Clarke	\$150.00	April 2008 Quarterly	Douglass Account
3/11/2008	3271	Gates BBQ	\$114.39	April 2008 Quarterly	Douglass Account
3/31/2008	Bank Charge	Service Charge	\$.60	April 2008 Quarterly	Douglass Account
3/31/2008	Bank Charge	Service Charge	\$10.00	April 2008 Quarterly	Douglass Account
4/30/2008	Bank Charge	Service Charge	\$.05	July 2008 Quarterly	Douglass Account
4/30/2008	Bank Charge	Service Charge	\$15.00	July 2008 Quarterly	Douglass Account
5/30/2008	Bank Charge	Service Charge	\$11.65	July 2008 Quarterly	Douglass Account
6/30/2008	Bank Charge	Service Charge	\$9.26	July 2008 Quarterly	Douglass Account
10/25/2008	3685	Danitha Thurman	\$50.00	30 Day After General	Douglass Account
11/1/2008	A00022	Michasel Wells	\$50.00	30 Day After General	Freedom Founders Liberty Account
11/6/2008	2143	Liberty Bank – Money Order to The KC Globe	\$4,675.00	30 Day After General	Freedom Founders Liberty Account

Date	Item	Payee/Description	Amount	Correct Report	Account
3/31/2009	Bank Charge	Service Charge	\$8.17	April 2009 Quarterly	Freedom Founders Liberty Account
6/30/2009	Bank Charge	Service Charge	\$7.81	July 2009 Quarterly	Freedom Founders Liberty Account
9/30/2009	Bank Charge	Service Charge	\$10.00	October 2009 Quarterly	Freedom Founders Liberty Account
10/30/2009	Bank Charge	Service Charge	\$10.00	January 2010 Quarterly	Freedom Founders Liberty Account
11/30/2009	Bank Charge	Service Charge	\$10.00	January 2010 Quarterly	Freedom Founders Liberty Account
		TOTAL	\$5,144.33		

Appendix C

Expenditures greater than \$100 reported without purpose, date, and/or address prior to
September 20, 2010

Date	Payee	Amount	Report	Missing Information	Account
1/5/2008	O.G. Investment	\$775.00	April 2008 Quarterly	Purpose; Date	Douglass Account
1/5/2008	Luther Florists	\$195.68	April 2008 Quarterly	Purpose; Date	Douglass Account
1/5/2008	Missouri Gas Energy	\$164.39	April 2008 Quarterly	Address; Purpose; Date	Douglass Account
1/5/2008	Gates BBQ	\$123.99	April 2008 Quarterly	Purpose; Date	Douglass Account
1/5/2008	Verizon Wireless	\$751.83	April 2008 Quarterly	Address; Purpose; Date	Douglass Account
2/1/2008	Perkins Coie	\$2,400.00	April 2008 Quarterly	Address; Purpose; Date	Douglass Account
2/1/2008	O.G. Investment	\$392.50	April 2008 Quarterly	Address; Purpose; Date	Douglass Account
2/6/2008	USPS	\$205.00	April 2008 Quarterly	Address; Purpose; Date	Douglass Account
2/22/2008	Missouri Gas Energy	\$730.50	April 2008 Quarterly	Address; Purpose; Date	Douglass Account
2/27/2008	AT&T	\$696.26	April 2008 Quarterly	Address; Purpose; Date	Douglass Account
3/11/2008	O.G. Investment	\$978.04	April 2008 Quarterly	Address; Purpose; Date	Douglass Account
3/19/2008	Luther Florists	\$528.44	April 2008 Quarterly	Address; Purpose; Date	Douglass Account
3/26/2008	The Call	\$3,745.00	April 2008 Quarterly	Address; Purpose; Date	Douglass Account
3/26/2008	Commerce Bank	\$797.13	April 2008 Quarterly	Address; Purpose; Date	Douglass Account
4/1/2008	Print Mail	\$10,453.22	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
4/1/2008	Vernon Thompson	\$400.00	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
4/2/2008	The Call	\$3,745.00	July 2008 Quarterly	Address; Purpose; Date	Douglass Account

Date	Payee	Amount	Report	Missing Information	Account
4/2/2008	The Globe	\$995.40	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
4/2/2008	Sam's Club	\$123.24	July 2008 Quarterly	Date; Address	Douglass Account
4/2/2008	Virginia Evans	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/3/2008	Print Mail	\$707.83	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
4/3/2008	Al Stovall	\$350.00	July 2008 Quarterly	Date; Address	Douglass Account
4/6/2008	Juanita Clarke	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/6/2008	Daniel Clarke	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/8/2008	Opal Cushon	\$125.00	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
4/8/2008	Edward Pendleton	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/8/2008	Monta Tindall	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/8/2008	Pamela Bland	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/8/2008	Curtis Jones	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/8/2008	Darrell Curls	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/8/2008	Rodney Bland	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/8/2008	Vernon Thompson	\$400.00	July 2008 Quarterly	Date; Address	Douglass Account
4/8/2008	Sybil Daniels	\$200.00	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
4/8/2008	Anthony Tyrone Smith	\$129.00	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
4/8/2008	Alvin Dodd	\$100.00	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
4/8/2008	Keith M Thomas	\$500.00	July 2008 Quarterly	Date; Address	Douglass Account

Date	Payee	Amount	Report	Missing Information	Account
4/8/2008	Sterling Bryant	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/8/2008	Vernon Thompson	\$400.00	July 2008 Quarterly	Date; Address	Douglass Account
4/8/2008	Curtis Jones	\$314.70	July 2008 Quarterly	Date; Address	Douglass Account
4/8/2008	Print Mail	\$210.08	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
4/9/2008	Media Placements LLC	\$1,084.12	July 2008 Quarterly	Date; Address	Douglass Account
4/9/2008	Orissa Kelly-Logan	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/10/2008	Gate's BBQ	\$864.08	July 2008 Quarterly	Date; Address	Douglass Account
4/10/2008	E Stafford	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/10/2008	Marvin Kelley	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/10/2008	O.G. Investment	\$622.92	July 2008 Quarterly	Date; Address	Douglass Account
4/15/2008	Brenda King	\$125.00	July 2008 Quarterly	Date; Address	Douglass Account
4/18/2008	Jackson County Demo Committee	\$1,150.00	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
4/29/2008	Lathrop & Gage	\$2,000.00	July 2008 Quarterly	Date; Address	Douglass Account
4/29/2008	AT&T	\$721.58	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
4/30/2008	Lathrop & Gage	\$500.00	July 2008 Quarterly	Date; Address	Douglass Account
4/30/2008	Alicia Bland	\$300.00	July 2008 Quarterly	Date; Address	Douglass Account
5/8/2008	Alicia Bland	\$175.00	July 2008 Quarterly	Date; Address	Douglass Account
5/15/2008	Velda Cook	\$248.35	July 2008 Quarterly	Date; Address	Douglass Account

Date	Payee	Amount	Report	Missing Information	Account
5/16/2008	Gate's BBQ	\$243.55	July 2008 Quarterly	Date; Address	Douglass Account
6/2/2008	USPS	\$294.00	July 2008 Quarterly	Date; Address	Douglass Account
6/9/2008	O.G. Investment	\$1,276.31	July 2008 Quarterly	Date; Address	Douglass Account
6/12/2008	Gates BBQ	\$197.36	July 2008 Quarterly	Date; Address	Douglass Account
6/18/2008	Archie W Welch	\$1,000.00	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
6/19/2008	Bobby Bryant Trio	\$400.00	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
6/21/2008	Jamie Brown	\$275.00	July 2008 Quarterly	Date; Address	Douglass Account
6/21/2008	Curtis Jones	\$183.44	July 2008 Quarterly	Date; Address	Douglass Account
6/25/2008	Rex Purefoy	\$250.00	July 2008 Quarterly	Date; Address	Douglass Account
6/26/2008	Gates BBQ	\$789.33	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
6/26/2008	Papa Lew's	\$307.23	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
6/26/2008	Commerce Bank	\$963.24	July 2008 Quarterly	Address; Purpose; Date	Douglass Account
7/2/2008	Cambridge Consultants	\$3,500.00	8 Day Before General	Freedom Inc	Douglass Account
7/10/2008	AT&T	\$670.55	8 Day Before General	Address; Purpose; Date	Douglass Account
7/10/2008	K.C. Power & Light	\$387.54	8 Day Before General	Address; Purpose; Date	Douglass Account
7/10/2008	Missouri Gas Energy	\$421.60	Amended 8 Day Before General	Address; Purpose; Date	Douglass Account

Date	Payee	Amount	Report	Missing Information	Account
7/25/2008	Burge Ice Service	\$170.50	30 Day After Primary	Address	Douglass Account
7/30/2008	The Globe	\$2,190.00	30 Day After Primary	Address	Douglass Account
8/5/2008	Tony Gregg	\$300.00	30 Day After Primary	Address	Douglass Account
8/5/2008	Thomas Bibbs Sr	\$150.00	30 Day After Primary	Address	Douglass Account
8/5/2008	Carol Coe	\$400.00	30 Day After Primary	Address	Douglass Account
8/15/2008	KCPL	\$566.69	30 Day After Primary	Address	Not In Bank Records
8/22/2008	AT&T	\$719.82	30 Day After Primary	Address	Douglass Account
8/25/2008	Sleep Inn	\$570.96	30 Day After Primary	Address	Douglass Account
8/25/2008	Embassy Suites Hotel	\$839.99	30 Day After Primary	Address	Douglass Account
10/1/2008	IRS	\$750.00	Amended 8 Day Before General	Address	Douglass Account
10/8/2008	USPS	\$210.00	Amended 8 Day Before General	Address	Douglass Account

Date	Payee	Amount	Report	Missing Information	Account
10/23/2008	The Globe	\$2,250.00	Amended 8 Day Before General	Address	Douglass Account
10/24/2008	Niles Home for Children	\$1,000.00	Amended 8 Day Before General	Address	Douglass Account
10/27/2008	Carol Coe	\$200.00	Amended 8 Day Before General	Address	Douglass Account
10/27/2008	Stephen Duncan	\$125.00	Amended 8 Day Before General	Purpose; Address	Douglass Account
10/29/2008	Luther Florists	\$227.49	Amended 8 Day Before General	Address	Douglass Account
11/3/2008	Office Max	\$209.06	Amended 8 Day Before General	Address	Douglass Account
11/3/2008	AT&T	\$714.04	Amended 8 Day Before General	Address	Douglass Account
11/3/2008	Commerce Bank	\$263.75	Amended 8 Day Before General	Address	Not In Bank Records
11/4/2008	Commerce Bank	\$2,011.53	Amended 8 Day Before General	Address	Freedom Founders Liberty Account

Date	Payee	Amount	Report	Missing Information	Account
11/4/2008	Carol Coe	\$300.00	Amended 8 Day Before General	Address	Freedom Founders Liberty Account
11/4/2008	Vernon Thompson	\$234.65	Amended 8 Day Before General	Address	Freedom Founders Liberty Account
11/4/2008	Deborah Miller	\$125.00	Amended 8 Day Before General	Address	Not In Bank Records
11/12/2008	Harland Clark	\$309.85	Amended 8 Day Before General	Address	Freedom Founders Liberty Account
1/8/2009	AT&T	\$822.43	April 2009 Quarterly	Address	Douglass Account
1/14/2009	US Postal Service	\$168.00	April 2009 Quarterly	Address	Freedom Founders Liberty Account
1/18/2009	The Maison Hotel	\$2,427.40	April 2009 Quarterly	Address	Douglass Account
2/2/2009	Lathrop & Gage	\$2,708.50	April 2009 Quarterly	Address	Freedom Founders Liberty Account
3/16/2009	Jackson County Demo Committee	\$200.00	April 2009 Quarterly	Purpose; Address	Freedom Founders Liberty Account
3/18/2009	US Postal Service	\$210.00	April 2009 Quarterly	Address	Freedom Founders Liberty Account
3/19/2009	Rex Purefoy	\$300.00	April 2009 Quarterly	Address	Freedom Founders Liberty Account
3/20/2009	AT&T	\$273.53	April 2009 Quarterly	Address	Douglass Account

Date	Payee	Amount	Report	Missing Information	Account
4/20/2009	Costco	\$279.00	July 2009 Quarterly	Address	Freedom Founders Liberty Account
4/22/2009	AT&T	\$282.28	July 2009 Quarterly	Address	Douglass Account
6/1/2009	UMMA	\$300.00	July 2009 Quarterly	Address	Freedom Founders Liberty Account
7/1/2009	AT&T	\$844.95	October 2009 Quarterly	Address	Douglass Account
8/8/2009	Wyatt's Catering	\$470.00	October 2009 Quarterly	Address	Douglass Account
9/2/2009	AT&T	\$613.32	October 2009 Quarterly	Address	Douglass Account
9/4/2009	KCPL	\$371.24	October 2009 Quarterly	Address	Freedom Founders Liberty Account
9/4/2009	US Postal Service	\$176.00	October 2009 Quarterly	Address	Freedom Founders Liberty Account
9/10/2009	Crossover Graphics LLC	\$1,000.00	October 2009 Quarterly	Address	Douglass Account
9/16/2009	Thomas Surety Services	\$503.50	October 2009 Quarterly	Address	Douglass Account
9/16/2009	KCPL	\$324.26	October 2009 Quarterly	Address	Not In Bank Records
9/21/2009	Robert Adams	\$150.00	October 2009 Quarterly	Address	Douglass Account
9/24/2009	Sam's Club	\$299.60	October 2009 Quarterly	Address	Douglass Account

Date	Payee	Amount	Report	Missing Information	Account
10/14/2009	Missouri Gas Energy	\$540.57	January 2010 Quarterly	Address	Douglass Account
10/15/2009	Missouri Gas Energy	\$600.00	January 2010 Quarterly	Address	Freedom Founders Liberty Account
10/23/2009	Orissa Kelley Logan	\$225.00	January 2010 Quarterly	Address	Douglass Account
10/23/2009	AT&T	\$672.16	January 2010 Quarterly	Address	Douglass Account
10/28/2009	The Call	\$1,000.00	January 2010 Quarterly	Address	Douglass Account
11/3/2009	Cambridge Consultants	\$1,974.63	January 2010 Quarterly	Address	Douglass Account
11/3/2009	Orissa Kelley Logan	\$225.00	January 2010 Quarterly	Address	Douglass Account
11/4/2009	Carter Broadcast Group	\$2,200.00	January 2010 Quarterly	Address	Douglass Account
12/7/2009	United States Postal Service	\$176.00	January 2010 Quarterly	Address	Douglass Account
12/21/2009	AT&T	\$714.82	January 2010 Quarterly	Address	Douglass Account
12/22/2009	Commerce Bank	\$263.75	January 2010 Quarterly	Address	Douglass Account
12/22/2009	Robert Adams	\$300.00	January 2010 Quarterly	Address	Douglass Account

Date	Payee	Amount	Report	Missing Information	Account
2/12/2010	KCPL	\$361.30	8 Day Before General	Address	Douglass Account
3/5/2010	US Postal Service	\$144.00	8 Day Before General	Address	Douglass Account
3/13/2010	Velda Cook	\$406.85	8 Day Before General	Address	Douglass Account
3/24/2010	Velda Cook	\$503.77	8 Day Before General	Address	Douglass Account
4/1/2010	Missouri Gas Energy	\$216.62	30 Day General	Address	Douglass Account
4/1/2010	The Call	\$1,050.00	30 Day General	Address	Douglass Account
4/1/2010	The Globe	\$497.70	30 Day General	Address	Douglass Account
4/2/2010	Orissa Kelley Logan	\$200.00	30 Day General	Address	Douglass Account
4/9/2010	Rodney Bland	\$200.00	30 Day General	Address	Douglass Account
4/20/2010	AT&T	\$726.74	30 Day General	Address	Douglass Account
6/7/2010	AT&T	\$315.85	July 2010 Quarterly	Address	Douglass Account

Appendix D

Campaign Worker Payments Not Itemized in Reports prior to September 20, 2010

Date	Item	Payee	Amount	Reported
4/2/2008	3314	Lawrence Johnson	\$80.00	July 2008 Quarterly
4/2/2008	3315	Michael Franklin	\$80.00	July 2008 Quarterly
4/2/2008	3318	Sean Watkins	\$80.00	July 2008 Quarterly
4/2/2008	3319	Carol Ply	\$80.00	July 2008 Quarterly
4/2/2008	3320	Theresa Bird	\$80.00	July 2008 Quarterly
4/2/2008	3321	Eklim Mitchell	\$80.00	July 2008 Quarterly
4/2/2008	3323	Damon Officer	\$80.00	July 2008 Quarterly
4/2/2008	3325	Darin Thomas	\$80.00	July 2008 Quarterly
4/2/2008	3326	Walter Strickland	\$80.00	July 2008 Quarterly
4/2/2008	3327	Mary Strickland	\$80.00	July 2008 Quarterly
4/5/2008	3312	Dorothy Belcher	\$80.00	July 2008 Quarterly
4/8/2008	3313	Gwendolyn Garrett	\$80.00	July 2008 Quarterly
4/8/2008	3329	Alfred Frazier	\$80.00	July 2008 Quarterly
4/8/2008	3330	Robert Harris	\$80.00	July 2008 Quarterly
4/8/2008	3331	Charles Smith	\$80.00	July 2008 Quarterly
4/8/2008	3333	Sabrie Lenz	\$80.00	July 2008 Quarterly
4/8/2008	3334	Martha Griffin	\$80.00	July 2008 Quarterly
4/8/2008	3355	Sheila Perry	\$80.00	July 2008 Quarterly
4/8/2008	3356	Joyce Hall	\$80.00	July 2008 Quarterly
4/8/2008	3357	Randall Hall	\$80.00	July 2008 Quarterly

Date	Item	Payee	Amount	Reported
4/8/2008	3358	Carla Fluat	\$80.00	July 2008 Quarterly
4/8/2008	3359	Stanley Burnett	\$80.00	July 2008 Quarterly
4/8/2008	3361	Myron Brooks	\$80.00	July 2008 Quarterly
4/8/2008	3362	Michael Fennell	\$80.00	July 2008 Quarterly
4/8/2008	3364	M Palmer	\$80.00	July 2008 Quarterly
4/8/2008	3366	Lewis Doyle	\$80.00	July 2008 Quarterly
4/8/2008	3367	Richie King	\$80.00	July 2008 Quarterly
4/8/2008	3372	Renee Williams	\$80.00	July 2008 Quarterly
4/8/2008	3374	Ann Wells	\$80.00	July 2008 Quarterly
4/8/2008	3375	Millie Willyham	\$80.00	July 2008 Quarterly
4/8/2008	3376	Michael Clarke	\$80.00	July 2008 Quarterly
4/8/2008	3377	Sandra kay Smith	\$80.00	July 2008 Quarterly
4/8/2008	3379	Michael Lee Groves	\$80.00	July 2008 Quarterly
4/8/2008	3394	Patricia Cole	\$80.00	July 2008 Quarterly
4/8/2008	3395	Adrian Gibbs	\$80.00	July 2008 Quarterly
4/8/2008	3396	Kenneth Brown	\$80.00	July 2008 Quarterly
4/8/2008	3397	illegible	\$80.00	July 2008 Quarterly
4/8/2008	3402	Tyta Shannon	\$80.00	July 2008 Quarterly
4/9/2008	3340	Chad Clark	\$80.00	July 2008 Quarterly
4/9/2008	3344	Tyrone Reed	\$80.00	July 2008 Quarterly
4/9/2008	3345	Frederick Tucker	\$80.00	July 2008 Quarterly
4/9/2008	3354	Terry E Savage	\$80.00	July 2008 Quarterly

Date	Item	Payee	Amount	Reported
4/10/2008	3335	David Goldwater	\$80.00	July 2008 Quarterly
4/10/2008	3336	Sharon Carter	\$80.00	July 2008 Quarterly
4/10/2008	3339	John Howard	\$80.00	July 2008 Quarterly
4/10/2008	3349	Lingwell Reynolds	\$80.00	July 2008 Quarterly
4/10/2008	3351	Brian Bennett	\$80.00	July 2008 Quarterly
4/10/2008	3352	Tanya Lewis	\$80.00	July 2008 Quarterly
4/10/2008	3409	James E White	\$80.00	July 2008 Quarterly
4/10/2008	3410	Daniel P Clarke Jr.	\$80.00	July 2008 Quarterly
4/11/2008	3341	Baynell Harris	\$80.00	July 2008 Quarterly
4/18/2008	3277	Orissa Kelly-Logan	\$100.00	July 2008 Quarterly
		Total	\$4,180.00	

Appendix E

Campaign Worker Payments Not Itemized in Reports on the 30 Day After April 2011 Election Report

Category	Amount	Report
Alvin Dodd, Campaign Worker	\$40.00	30 Day After General Election- 4/5/2011
Anthony Smith - Canvasser	\$40.00	30 Day After General Election- 4/5/2011
Bridget Belcher, Campaign worker	\$32.00	30 Day After General Election- 4/5/2011
Byron Elam, Campaign Worker	\$40.00	30 Day After General Election- 4/5/2011
Charles Hazley, Campaign Worker	\$96.00	30 Day After General Election- 4/5/2011
Craig Polk, Campaign Worker	\$40.00	30 Day After General Election- 4/5/2011
Darnell Jenkins, Campaign Worker	\$50.00	30 Day After General Election- 4/5/2011
Ebony Murphy, Campaign Worker	\$32.00	30 Day After General Election- 4/5/2011
Gary Briggs, Campaign Worker	\$40.00	30 Day After General Election- 4/5/2011
Greogery Norvus, Campaign Worker	\$40.00	30 Day After General Election- 4/5/2011
Javeene Littlejohn, Campaign Worker	\$40.00	30 Day After General Election- 4/5/2011
Jeffery Thomas, Campaign Worker	\$90.00	30 Day After General Election- 4/5/2011
Jessenia, Estelle, Campaign Worker	\$40.00	30 Day After General Election- 4/5/2011

Category	Amount	Report
Jinniece Bailey, Campaign Worker	\$90.00	30 Day After General Election- 4/5/2011
Kevin Campbell, Campaign Worker	\$50.00	30 Day After General Election- 4/5/2011
Lonnie Stanley, Campaign Worker	\$40.00	30 Day After General Election- 4/5/2011
Milton McGartha Canvasser	\$40.00	30 Day After General Election- 4/5/2011
Quenton Garrett, Campaign Worker	\$40.00	30 Day After General Election- 4/5/2011
Stephen Ford, campaign Worker	\$90.00	30 Day After General Election- 4/5/2011
Timothy McCane, Campaign Worker	\$90.00	30 Day After General Election- 4/5/2011
TOTAL	\$1,060.00	

Filed
OCT 26 2012
Missouri Ethics
Commission

**BEFORE THE
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,)
)
) Petitioner,)
) Case No. 09A274, 09E277, 09E301, and
v.) 12E077
)
)
FREEDOM INCORPORATED,)
)
) a Continuing Committee,)
)
) Respondent.)

CONSENT ORDER

The parties having filed a Joint Stipulation of Facts, Waiver of Hearing before the Missouri Ethics Commission, and Consent Order with Proposed Findings of Fact and Conclusions of Law (“Joint Stipulation”) with the Missouri Ethics Commission in this matter, the Missouri Ethics Commission hereby accepts as true the facts stipulated and finds that Respondent Freedom Incorporated violated Sections 130.021.4(1), 130.021.5, 130.021.7, 130.021.5(3), 130.021.4(1), 130.031.2, 130.041.1, 130.046.3, 130.041.1(3), 130.041.1(4), 130.041.1(4)(d), 130.041.4, 130.041.1(7), 130.034.1, 130.034.2, and 130.021.4(1), RSMo, as stated in the Joint Stipulation.

The Commission directs that all terms and orders of the Joint Stipulation be adopted herein and implemented.

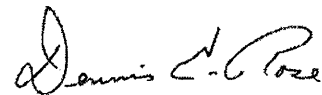
1. Respondent agrees that it will comply with all relevant sections of Chapter 130, RSMo.
2. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondent Freedom Incorporated in the amount of \$175,000 pursuant to Section 105.961.4(6), RSMo. However, if Respondent pays \$9,500 of that fee within forty-

five (45) days of the date of this Order, the remainder of the fee will be stayed, subject to the provisions below. The fee will be paid by check or money order made payable to the Missouri Ethics Commission and sent to the Missouri Ethics Commission.

3. If Respondent Freedom Incorporated commits any further violations of the campaign finance laws pursuant to Chapter 130, RSMo, as amended, within the two year period from the date of this order, then Respondent Freedom Incorporated will be required to pay the remainder of the fee as originally imposed by the Commission. The fee will be due immediately upon final adjudication finding that Respondent Freedom Incorporated committed such a violation.

SO ORDERED this 26th day of October,
2012

By:



Dennis Rose, Chair
Missouri Ethics Commission