BEFORE THE
MISSOURI ETHICS COMMISSION

Filed
DEC 13 2010
Missouri Ethics Commission

MISSOURI ETHICS COMMISSION	)	
	)	
Petitioner,	)	
	)	
v.	)	
	)	
	)	
RODNEY HUBBARD, Candidate	)	No. 09A056
	)	
and	)	
	)	
JOY CAMP, Treasurer	)	
	)	
and	)	
	)	
HUBBARD FOR SENATE, Committee	)	
	)	
Respondents.	)	

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

This is the Final Decision and Order of the Missouri Ethics Commission following a hearing on a Complaint filed by Petitioner, by and through Counsel, pursuant to §105.961, RSMo, and Chapter 536, RSMo. The hearing was conducted before the following members of the Missouri Ethics Commission: Jim Wright, Jim Tweedy, Jeff Davison, Vernon Dowdy, Louis J. Leonatti, and Dennis Rose.

A closed hearing took place on September 10, 2010 and December 9, 2010 at the offices of the Missouri Ethics Commission at 3411 A Knipp Drive, Jefferson City, Missouri 65109. The Commission was represented by Elizabeth L. Ziegler, Legal Counsel. Respondents Rodney Hubbard and Joy Camp, appeared in person and with counsel.

On September 10, 2010, Petitioner and Respondents entered into a Joint Stipulation of Facts and Law which is incorporated into to this Findings of Fact, Conclusions and Order. The Commission admitted into evidence Petitioner's Exhibits 1 through 32. Having considered all the competent and substantial evidence upon the whole record, the Commission finds as follows:

FINDINGS OF FACT

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

2. Rodney Hubbard was an unsuccessful candidate for State Senate, District 5 in the August 5, 2008 primary election.

3. Hubbard for Senate is a candidate committee registered with Petitioner. On March 2, 2009, an amended statement of committee organization was filed converting Respondent to a debt service committee. Respondent Joy Camp is the Treasurer of Committee.

4. Pursuant to § 130.026, RSMo, the Missouri Ethics Commission is the appropriate officer designated to receive campaign finance reports under Chapter 130 for candidate committees.

5. Respondents Hubbard as Candidate, and Camp, as Treasurer, were responsible for filing campaign finance reports for Respondent Committee, pursuant to § 130.041.1 and §130.058, RSMo.

6. Pursuant to § 105.959, RSMo, the Commission's staff audited the files of the Committee and reported its findings to the Commission.

Failure to Maintain Accurate and Complete Records

7. On October 25, 2009, Respondent Joy Camp was duly served with a subpoena *duces tecum* for all records and documents relating to Respondent Committee in the possession of the Respondents.

8. The documents provided which were subject to the subpoena *duces tecum* were not accurate records and accounts containing all 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.

Failure to Timely File Campaign Finance Disclosure Reports

9. Respondents filed a thirty day after primary disclosure report on October 10, 2008, originally due on September 4, 2008.

10. Respondents filed an October 2008 Limited Activity Report, originally due on October 15, 2008, on October 27, 2008.

11. Respondents filed an October 2009 Limited Activity Statement, originally due on October 15, 2009, on October 26, 2009.

12. Respondents filed Limited Activity Statements for January and April 2009 on April 26, 2009. Both reports were originally due on April 15, 2009.

Improper Filing of Limited Activity Reports for January and April 2009

13. On June 29, 2007, Respondents deposited into the official fund depository a contribution in the amount of $30,000.00 from Rex A. Sinquefeld. This contribution was reported on the July 2007 Quarterly Disclosure Report.

14. On November 25, 2007, Petitioner was informed by Antonio D. French, identified as Campaign Manager for Respondent Committee, that the Committee would soon begin the process of returning contributions which were over the recently reinstated limits of $650.00.

15. On the Amended April 2008 Quarterly Disclosure Report, Respondents reported a refund to Rex Sinquefeld on February 20, 2008 in the amount of $15,007.00, and a refund in the amount of $15,000.00 on March 20, 2008.

16. On February 20, 2008 check number 1116 from the official fund depository was issued to Joy Camp and contained the signature "Joy Camp". The check was written for $15,007.00 but cleared the official fund depository for $1,507.00. On February 21, 2010, there was a 'miscellaneous withdrawal' from the official fund depository in the amount of $13,500.00.

17. On March 20, 2008, check number 1125 was issued from the official fund depository in the amount of $15,000.00.

18. On October 23, 2008, $15,000.00 was credited to the official fund depository for reimbursement of funds issued on February 20, 2008. The "General Ledger Debit" stated, "Refund for cashiers [check] on 2/20/08 for $15,000.00, check was destroyed. Serial # on [check] is 528233607- purchased @ Lindell." Prior to February 20, 2008, the account balance in the official fund depository was $19.53.

19. Respondents failed to report the following expenditures on a timely filed January or April 2009 Campaign Finance Disclosure report, following the credit of $15,000.00 which occurred as follows:

Date	Item	Expenditure	Amount
10/23/2008	Debit	Exxon	$72.56
10/24/2008	1204	CASH	$13,021.00
10/24/2008	ATM	CASH (Tucker branch)	$500.00
10/26/2008	1206	CASH	$100.00
10/27/2008	1205	CASH	$1007.00
11/3/2008	Debit	Money Control In.	$590.53

20. Respondents produced a check register for check number 1205, which was handwritten, "10-27-08 Chilenski Group, 1007 Cashiers Check, and failed to produce a copy of a cashiers check in the amount of $1,007.00. Respondents failed to maintain and make available records of any other expenditures listed in paragraph 19.

21. Respondents failed to report the following additional expenditures on a timely filed Campaign Finance Disclosure report and failed to maintain and make available records to support the expenditures as follows:

Date	Item	Expenditure	Amount
9/16/2008	1200	58th LCD Org	$16.45
9/16/2008	1202	Schnucks	$103.28
9/16/2008	ATM	CASH (Tucker branch)	$100.00

22. Respondents failed to report a contribution in the amount of $650.00 from Aquila, Inc. deposited into the official fund depository on October 30, 2008.

Failure to Accurately Report Contributions Received

23. The campaign finance disclosure statements originally filed by Respondents failed to reflect the following contributions, including the name, address, employer or occupation of the contributor which were deposited into the official fund depository:

Check Date	Check Number	Contributor	Amount
4/26/2007	3832	Judge Jon Gray	$50.00
6/19/2007	1075	MPGA Propane PAC	$150.00
6/29/2007	6759	Brenda Carley	$500.00

7/1/2007	8612	4447 LLC	$1,500.00
7/6/2007		CASH	$550.00
7/11/2007	2506	Capital Consultants	$150.00
7/11/2007	2750	Carlita Vasser	$100.00
7/11/2007	1771	Committee to Elect Reed	$200.00
7/11/2007	399	Eddie Hasan	$250.00
7/11/2007	1030	Gary Parker	$100.00
7/11/2007	21205	Harris Construction	$150.00
7/11/2007	5385	Jerry Hunter	$500.00
7/11/2007	1144	Mound City Group LLC	$1,000.00
7/12/2007	2099	Greater KC Chamber of Commerce PAC	$2,500.00
7/23/2007	40021232	Clear Channel Worldwide	$1,326.00
7/27/2007	113211	ILLEGIBLE	$150.00
8/4/2007	1777	James Carter Blew	$500.00
9/23/2007	1316	Qasim Bajwa	$100.00
11/30/2007	116519	Kaitroy Hubbard	$50.00
12/1/2007	1011	57th District Legislative Committee	$6,500.00
12/13/2007	764	Sabrina Chamberlain	$50.00
12/14/2007	08-802439999	Gloria Hubbard	$100.00
12/19/2007	581	MBA Gateway Region PAC	$650.00
12/26/2007	30072	International Catering, Inc.	$500.00
1/7/2008	1210	58th Democratic Legislative District Comm.	$6,500.00
1/15/2008	17172	Alex's Restaurant and Lounge, Inc	$100.00
1/24/2008		CASH	$14,050.00
1/25/08	147	Amanda Yvette Collins	$75.00
1/28/08	1998	Leslie F. Bond, Jr.	$200.00
2/4/2008	10108685030	Garfield Hubbard Jr.	$100.00
2/8/2008		CASH	$225.00
3/2/2008	2467	Anita Banks	$100.00
3/2/2008	2849	Sandra Murdock	$50.00
3/12/2008	2235	Gateway Waterproofing and Restoration	$100.00
3/12/2008	4335	Robert Vatterott	$100.00
3/13/2008	4245	Friedman Group Ltd	$100.00
3/14/2008	7090	AME Constructors, Inc	$100.00
3/17/2008		CASH	$100.00
3/17/2008	262869	Unigroup Inc	$650.00
3/18/2008	1141	Lyle Gulley	$100.00
3/20/2008	14733	Gateway Contractors	$2,000.00
3/24/2008	1001	Your School Your Choice PAC Central	$150.00
3/26/2008	2055	Leslie F Bond	$200.00
3/27/2008	2003 (temp)	Women for Hubbard	$500.00
3/31/2008	998	1st Ward Democratic Organization	$300.00
4/1/2008		CASH	$200.00
4/1/2008		CASH	$1,500.00
4/08/2008	41797	Metro Heart Group of St. Louis	$675.00

5/12/2008		CASH	$685.00
5/13/2008		CASH	$340.00
6/13/2008	626361	57th District Legislative Committee	$4,500.00
6/13/2008	2495	Sheila Hudson	$500.00
6/17/2008	1858	Eastern MO Laborer's Ed and Benevolent Fund	$650.00
6/17/2008	1214	Laborers Int'l Union of NA #53 PAC	$650.00
6/18/2008	1153	PAC CF Laborer's Local 42	$650.00
6/26/2008	1158	All Children Matter-Missouri	$675.00
6/26/2008		CASH	$1,000.00
6/27/2008	508	Laborers In't Union Local #110	$675.00
6/28/2008	2776	Carlos Jenkins	$25.00
6/30/2008	2671	Jacquelyn Etling	$325.00
6/30/2008	16582	Peiker-Piatchek Assoc Inc	$500.00
7/1/2008	2604	Teamsters Local 600 Drive PAC	$675.00
7/2/07		CASH	$861.00
7/3/2008	3710	Steven Sullivan	$200.00
7/8/2008	111958	Aquila	$650.00
7/9/2008	1692	NFIB-Missouri Safe Trust	$675.00
7/10/2008	1843	Craig Sherrill	$25.00
7/11/2008	9193	MO Association of Municipal Utilities	$500.00
7/12/2008	2028	Robert Fox	$675.00
7/15/2008	3146	ACT Blue	$648.34
7/17/2008	675	MBA Capitol Region PAC	$675.00
7/18/2008	215368	Burns & McConnell	$675.00
7/20/2008	3192	ACT Blue	$240.12
7/22/2008	4072283	Harrah's Operating Company Inc	$675.00
7/22/2008	433	MO AHA PAC	$675.00
7/24/2008	5804343883	Garfield Hubbard, JR Money-	$200.00
7/25/2008	1008	MO For Tax Reform Central	$675.00
7/25/2008	1012	MO Supporting Teaching Excellence - South	$675.00
7/25/2008	1009	MO Supporting Teaching Excellence Statewide	$675.00
7/25/2008	1005	My Job My Wage Ward 18	$675.00
7/25/2008	1003	My Job My Wage Ward 27	$675.00
7/25/2008	1005	My Job My Wage Ward 28	$675.00
7/25/2008	1005	My Job My Wage Ward 4	$675.00
7/25/2008	1003	My Job My Wage Ward 5	$675.00
7/25/2008	1004	My Job My Wage Ward 6	$675.00
7/25/2008	1005	My Job My Wage Ward President's Ward 29	$675.00
7/25/2008	1006	Public Charter Schools for MO – Statewide	$675.00

7/25/2008	1009	Public Charter Schools for MO – West	$675.00
7/25/2008	1011	Your School Your Chioce PAC North	$675.00
7/25/2008	1011	Your School Your Choice PAC East	$675.00
7/25/2008	1011	Your School Your Choice PAC Northeast	$675.00
7/25/2008	1009	Your School Your Choice PAC Northwest	$675.00
7/25/2008	1010	Your School Your Choice PAC South	$675.00
7/25/2008	1009	Your School Your choice PAC Southeast	$675.00
7/25/2008	1009	Your School Your Choice PAC Southwest	$675.00
7/25/2008	1008	Your School Your Choice PAC Statewide	$675.00
7/25/2008	1007	Your School Your Choice PAC West	$675.00
7/28/2008	1574	Ballpark Site Holdings Inc	$675.00
7/28/2008	801466519	Bennie Lewis	$ 100.00
7/28/2008	2780	Gateway Parking LLC	$675.00
7/28/2008	1395	SLC Holdings LC	$675.00
7/28/2008	60656	St. Louis Cardinals LLC	$675.00
7/29/2008	4384	Faquir Muhammud	$50.00
7/29/2008	5323	Fatima Nasree Siddiqui	$100.00
7/29/2008	4197	Larry/Jan Gregory	$500.00
7/29/2008	10302	M Ishaq Chishti	$200.00
7/29/2008	2329	Mohammed Khan	$50.00
7/29/2008	6341	Rehana Kahn	$100.00
7/30/2008	1004	My Job My Wage Ward 25	$675.00
7/30/2008	1004	My Job My Wage Ward 26	$675.00
8/1/2008	1022	Tyler Investment Company LLC	$500.00
8/3/2008	7479	Claude/Dianne Hubbard	$100.00
8/3/2008	9177	Karen/Malvin Hubbard	$250.00
8/3/2008	5278	Malva/Karen Hubbard	$100.00
8/3/2008	192	Valeric Clark-Thompson	$50.00
8/04/08	946	Levi Leonard	$100.00
8/19/08		Counter Deposit	$500.00
		TOTAL	**$85,850.46**

24. Respondents reported the following contributions on original campaign finance disclosure reports which were not identified in the official fund depository as reported:

Date on Report	**Contributor**	**Amount**	**Report**
6/1/2007	One City Central LLC	$5,000.00	JulyQ07
6/29/2007	Ashli Thomas	$25.00	JulyQ07
6/29/2009	Daniel MBA	$25.00	JulyQ07
6/29/2007	L. Howard	$25.00	JulyQ07

6/29/2007	Bard Rivers	$25.00	JulyQ07
6/29/2007	Jerome King	$25.00	JulyQ07
6/29/2007	Anthony Winston	$25.00	JulyQ07
6/29/2007	Ebony Washington	$25.00	JulyQ07
6/29/2007	Karen Combs	$100.00	JulyQ07
6/29/2007	Jackie Combs	$25.00	JulyQ07
6/29/2007	Parthenim White	$25.00	JulyQ07
6/29/2007	LaTonia Collins	$25.00	JulyQ07
6/29/2007	Richard Brooks	$25.00	JulyQ07
6/29/2007	Stacy Stevens	$100.00	JulyQ07
6/29/2007	Minnie Cain	$25.00	JulyQ07
6/29/2007	Denise Cain	$25.00	JulyQ07
6/29/2007	Steve Smith	$50.00	JulyQ07
6/29/2007	Brandon N	$25.00	JulyQ07
6/29/2007	Ron Casey	$25.00	JulyQ07
6/29/2007	Terran Austin-El	$25.00	JulyQ07
6/29/2007	Quincy L Cox	$25.00	JulyQ07
6/29/2007	Garfield Hubbard	$25.00	JulyQ07
6/29/2007	Theophilus Peeked	$25.00	JulyQ07
6/29/2007	Zerrick Blakely	$25.00	JulyQ07
6/29/2007	Darryl Scott	$25.00	JulyQ07
6/29/2007	Kimberly Hubbard	$25.00	JulyQ07
6/29/2007	Mallory Hubbard	$25.00	JulyQ07
6/29/2007	Jaguar Entertainment, LLC	$500.00	JulyQ07
6/29/2007	Ron Vernell	$25.00	JulyQ07
6/29/2007	Andriette Fields	$25.00	JulyQ07
6/29/2007	Shamonica Darden	$25.00	JulyQ07
6/29/2007	Marilyn Hubbard	$25.00	JulyQ07
6/29/2007	Dayn Lusk	$25.00	JulyQ07
6/29/2007	Malvin Young	$25.00	JulyQ07
6/29/2007	Brittany Hubbard	$50.00	JulyQ07
6/29/2007	Travis Reems	$50.00	JulyQ07
6/29/2007	Ashley Hubbard	$25.00	JulyQ07
6/29/2007	Shai Key	$25.00	JulyQ07
6/29/2007	Shirley Finley	$25.00	JulyQ07
6/29/2007	Mobil Mart	$25.00	JulyQ07
6/29/2007	Rochelle Hearn	$50.00	JulyQ07
6/29/2007	Jim Kim	$25.00	JulyQ07
6/29/2007	Daniel Bush	$25.00	JulyQ07
6/29/07	Hakeem Savage	$25.00	JulyQ07
6/29/2007	Malra Rutlin	$25.00	JulyQ07

6/29/07	Columbus Edwards	$25.00	JulyQ07
12/20/2007	MO Agents PAC	$300	JanQ08
12/28/2007	Rosenblum, Schwartz, Rodgers, & Glass PC – deposited into 58th 12/27/07	$250	JanQ08
12/20/2007	Realtor (PAC)- deposited into 58th 12/19/07	$650.00	JanQ08
12/20/2007	Lamont Johnson	$25.00	JanQ08
12/20/2007	Mallory Hubbard	$25.00	JanQ08
12/20/2007	Eji Hieme	$25.00	JanQ08
12/20/2007	Jihan Smith	$25.00	JanQ08
12/20/2007	Quincy Smith	$25.00	JanQ08
12/20/2007	Toni Hopson	$25.00	JanQ08
12/20/2007	Judith Pruitt	$25.00	JanQ08
12/20/2007	Brenilda Melendez	$25.00	JanQ08
12/20/2007	Ronald Roberts	$100.00	JanQ08
12/20/2007	Lashaunda Washington	$25.00	JanQ08
12/20/2007	Theophilus Peek-EL	$25.00	JanQ08
12/20/2007	Hubert Hoosman	$25.00	JanQ08
12/20/2007	Peggy Ryan	$25.00	JanQ08
12/20/2007	Meredith Walker	$25.00	JanQ08
12/20/2007	Anne Faber	$50.00	JanQ08
12/20/2007	Floyd Irons	$25.00	JanQ08
12/20/2007	V. John Cross	$50.00	JanQ08
12/20/2007	Doreen Gordon	$30.00	JanQ08
2/10/2008	Johnston & Associates	$200.00	AprlQ08
3/28/2008	Network In Human Services Inc.-deposited in 58th 3/31/08	$100.00	AprlQ08
5/30/2008	Enterprise Rent-a-car	$675.00	JulyQ08
6/25/2008	MOSFA PAC Inc	$675.00	JulyQ08
7/30/2008	Missourians Supporting Teaching Excellent – deposited in 58th 7/31/08	$1,800.00	30Day After
7/30/2008	Missourians Supporting Teaching Excellent – deposited in 58th 7/31/08	$2,000.00	30Day After
7/30/2008	Missourians Supporting Teaching Excellent – deposited in 58th 7/31/08	$2,200.00	30Day After
	Total	**$16,280.00**	

25. Respondents reported the following contributions which were deposited into the official fund depository of the 58th Legislative District Committee, a political party committee registered under Chapter 130.

Date	Contribution and Deposit	Amount	Hubbard for Senate Report
12/28/2007	Rosenblum, Schwartz, Rodgers, & Glass PC – deposited into 58th 12/27/07	$250.00	JanQ08
12/20/2007	Realtor (PAC)- deposited into 58th 12/19/07	$650.00	JanQ08
3/28/2008	Network In Human Services Inc.-deposited in 58th 3/31/08	$100.00	AprlQ08
7/30/2008	Missourians Supporting Teaching Excellent – deposited in 58th 7/31/08	$1,800.00	30Day After
7/30/2008	Missourians Supporting Teaching Excellent – deposited in 58th 7/31/08	$2,000.00	30Day After
7/30/2008	Missourians Supporting Teaching Excellent – deposited in 58th 7/31/08	$2,200.00	30Day After
	Total	**$7,000.00**	

26. Respondents failed to maintain and make available committee records to support that contributions were accurately reported on campaign finance disclosure statement filed by Respondents.

Failure to Accurately Report Expenditures

27. The campaign finance disclosure statements filed by Respondents failed to accurately identify the following expenditures which were paid from the official fund depository, including the name and address of each to whom the expenditure was made or incurred from the official fund depository, and the purpose for each expenditure as follows:

Miscellaneous Expenditures

Date	Check	Expenditure/Note	Amount
6/25/2007	Bank Chg	Deluxe Business checks	$84.07
7/1/2007	Temp Check	O.R. Pechman Co Inc. – 19192 Invoice	$861.93
7/1/2007	Temp Check	Salama Market – "T-shirt/Security	$2,000.00
7/11/2007	Temp Check	Desiree Charbonet Committee	$2,500.00
7/12/2007	Debit	Wal-Mart	$164.49
7/16/2007	Bank Chg	Analysis Service Chg	$2.00
7/16/2007	Debit	Sprint Parkway Overland Park, KS	$165.88
7/17/2007	Debit	Westin Hotels STL	$27.84

7/17/2007	Debit	Westin Hotels STL	$634.48
7/18/2007	Debit	Exxon Mobile	$44.07
7/18/2007	Debit	Saveway Food	$181.87
7/19/2007	Debit	Touchless Car Wash	$23.00
7/26/2007	Debit	Shell Oil	$56.71
7/31/2007	Debit	St Louis Auto	$929.37
8/1/2007	Debit	Globe Cleaners	$88.90
8/1/2007	Debit	The Ritz Carlton	$96.74
8/10/2007	Debit	Landry's	$285.82
8/10/2007	Debit	Salama market	$559.00
8/10/2007	Debit	Sprint Nextel 800-639-6111 VA	$588.97
8/13/2007	1036	Salama Market	$580.00
8/13/2007	1037	Big Brothers Big Sisters	$250.00
8/13/2007	1038	100 Black Men St. Louis	$750.00
8/14/2007	Bank Chg	Analysis Service Chg	$22.00
8/22/2007	Debit	CNS Cingular	$1,704.40
8/24/2007	Debit	Exxon Mobile	$47.66
8/27/2007	1046	Morning Star Mission Baptist Church	$1,000.00
8/27/2007	Debit	St Louis Auto	$565.25
8/30/2007	1050	Clear Channel - #2234 FM	$848.00
9/4/2007	Debit	Exxon Mobile	$39.45
9/4/2007	Debit	Wal-Mart	$65.51
9/4/2007	Debit	Hotel Deville Jefferson City	$66.95
9/4/2007	Debit	Hotel Deville Jefferson City	$66.95
9/4/2007	Debit	Sou Guitar Center STL	$894.98
9/5/2007	Debit	Renaissance Hotel	$196.30
9/7/2007	Debit	Exxon Mobile	$36.73
9/10/2007	Debit	Salama Market	$1,000.00
9/12/2007	Debit	The Ritz Carlton	$875.00
9/17/2007	Debit	The Atlanta Link	$49.50
9/17/2007	Debit	Hotel Deville Jefferson City	$66.95
9/19/2007	1061	Citizens for Charbonnet	$1,500.00
9/19/2007	Debit	Breaktime	$23.03
9/19/2007	Debit	Exxon Mobile	49.88
9/19/2007	Debit	Exxon Mobile	$24.02
9/20/2007	Debit	Bovina Truck - Vicksburg	$30.51
9/21/2007	Debit	A & M Minimart #10	$12.05
9/23/2007	1063	Publication Printing	$550.00
9/24/2007	Debit	Exxon - STL	$49.52
9/27/2007	Debit	Rhodes - Perryville, MO	$31.24
9/27/2007	Debit	Globe Cleaners	$155.00
10/4/2007	Debit	Kings Hwy BP Stl	$21.01
10/4/2007	Debit	Kings Hwy BP Stl	$47.78
10/5/2007	Debit	Office Depot	$63.50
10/8/2007	1076	Promethians Inc	$400.00

10/10/2007	Debit	ExxonMobile Richard	$39.55
10/10/2007	Debit	Sou Apple Store	$48.38
10/12/2007	Debit	Apple Store	$138.99
10/12/2007	Debit	Weinhardt Party	$765.88
10/12/2007	Debit	Salama Market	1,000.00
10/15/2007	Debit	Fastlane Kingdom City	$39.36
10/15/2007	Debit	Country Kitchen	$70.01
10/16/2007	Debit	Exxon Mobile STL	$36.29
10/16/2007	Debit	St Louis Auto	$778.08
10/17/2007	Debit	NAES Fuel	$26.96
10/22/2007	Debit	Exxon Mobile	$39.38
10/22/2007	Debit	Exxon Mobil	$49.51
10/24/2007	Debit	Original Graffiti	$2,959.39
10/25/2007	Debit	Sprint Nextel 800-639-6111 VA	$867.28
10/22/2007	Debit	Brennan's	$538.92
10/22/2007	Debit	Brennan's	$36.89
10/28/2007	Debit	Wal-Mart	$66.45
10/29/2007	Debit	Ritz Carlton	$113.91
10/31/2007	Debit	1225 Union Blvd	$26.38
10/31/2007	Debit	Cingular	$509.23
11/5/2007	1093	SMOS – Caleb and David Camp	$235.00
11/5/2007	Bank Chg	ATM Fee	$1.50
11/5/2007	Debit	Globe Cleaners	$24.25
11/21/2007	Debit	Exxon Mobil StL	$36.70
11/26/2007	Debit	QT KC, MO	$33.19
11/26/2007	Debit	QT Wentzville	$44.50
11/26/2007	Debit	Copia STl	$45.85
11/27/2007	Debit	Baymont Inn KC MO	$104.64
11/28/2007	Debit	Exxon Mobil	$46.22
12/4/2007	Debit	Cingular	$650.40
12/7/2007	Debit	Pepsi Rockville MO	$2.50
12/10/2007	Bank Chg	ATM Fee	$2.00
12/12/2007	1098	UAPO	$300.00
12/13/2007	Debit	Exxon Mobil	$46.34
12/13/2007	Debit	Ritz Carlton	$1,691.95
12/29/2007	1100	Salama Market	$2,300.00
12/31/2007	Bank Chg	Overdraft charges (11)	$276.00
12/31/2007	Debit	Aldi #57	$42.84
12/31/2007	Debit	Family Dollar #3	$99.70
1/16/2008	Temp Check	MLK Support Group	$150.00
1/31/2008	Temp Check	Economical Mail - Mailing	$3,932.95
2/6/2008	Temp Check	Committee to Elect Sharon Mize	$100.00
2/19/2008	ATM	Capitol Bldg	$300.00
2/25/2008	1117	MDP	$100.00
2/26/2008	1118	Committee to Elect Chris Carter-	$325.00

2/29/2008	Temp Check	O.R. Pechman Co Inc. - Signs	$4,000.00
3/31/2008	Debit	Shell	$55.15
6/9/2008	1153	Carpenter for Recorder	$1,200.00
7/7/2008	1175	Salama Market - Supplies	$1,100.00
7/10/2008	1178	Schnucks	$47.24
8/1/2008	Debit	Rena Inc STL	$40.04
8/1/2008	Debit	Rena Inc STL	$56.10
8/1/2008	Debit	Papa John's	$89.15
8/1/2008	Debit	IMO's	$91.17
8/6/2008	Debit	Paypal	$75.00
8/8/2008	ATM	ATM Fee	$2.00
8/11/2008	ATM	ATM Fee	$2.00
9/16/2008	1200	58th LCD Org	$16.45
9/16/2008	1202	Schnucks	$103.28
10/23/2008	Debit	Exxon	$72.56
11/3/2008	Debit	Money Control In	$590.53
		Total	**$47,961.35**

Cash Expenditures Not Identified on Any Campaign Finance Disclosure Report

Date	**Transaction Type**	**Location of Cash Transaction**	**Amount**
7/10/2007	ATM	CASH	$40.00
9/12/2007	ATM	US Bank (Jefferson City)	$440.00
12/10/2007	ATM	CASH (natural bridge stl)	$201.95
12/27/2007	ATM	CASH (Tucker branch)	$40.00
12/27/2007	ATM	CASH (Tucker branch)	$360.00
12/31/2007	ATM	CASH (Tucker branch)	$400.00
12/31/2007	ATM	CASH (Tucker branch)	$500.00
7/31/2008	Cash from deposit	CASH from deposit made	$350.00
9/16/2008	ATM	CASH (Tucker branch)	$100.00
10/24/2008	Check: #1204	CASH	$13,021.00
10/24/2008	ATM	CASH (Tucker branch)	$500.00
10/26/2008	Check: #1206	CASH	$100.00
10/27/2008	Check: #1205	CASH	$1,007.00
		Total	**$17,059.95**

Expenditures to Joy Camp

Date	Check	Expenditure/Note	Amount
8/20/2007	1043	Joy Camp	$320.00
9/18/2007	1059	Joy Camp	$500.00
9/24/2007	1060	Joy Camp	$200.00
2/20/2008	1116	Joy Camp	$1,507.00
7/30/2008	1189	Joy Camp - Campaign Worker/Food	$14,000.00
8/1/2008	1195	Joy Camp	$2,535.00
8/1/2008	1196	Joy Camp	$400.00
		Total	**$19,462.00**

Expenditures to Individuals

Date	Check	Expenditure/Note	Amount
7/2/2007	Temp Check	Daphne Garrett – Campaign Worker	$300.00
7/3/2007	Temp Check	AD French and Associates – Campaign Consulting	$1,000.00
7/6/2007	Temp Check	Anthony White	$300.00
7/20/2007	1008	Carl Hunt	$550.00
7/20/2007	1009	Jamal Muhammed	$550.00
7/20/2007	1016	Jimmie Bullard	$500.00
8/2/2007	1031	Larry Bastain	$1,500.00
8/2/2007	1032	LaMonica Steward	$500.00
8/13/2007	1033	Antaneka Shahid	$1,000.00
8/17/2007	1041	Felicia Moore	$150.00
8/27/2007	1047	Adolphus Pruitt II	$3,000.00
8/27/2007	1048	Vivian Jackson	$1,000.00
8/29/2007	1049	Paqmr Vantress	$250.00
9/2/2007	1052	Stacy Muhammad	$150.00
9/2/2007	1054	John Plummer	$250.00
9/2/2007	1053	Anthony White	$100.00
9/3/2007	1055	Margarette Howard	$1,500.00
9/3/2007	1056	Larry Bastain	$500.00
9/5/2007	1057	Reggy Sywald	$40.00
9/23/2007	1066	Rosalynn Gray	$350.00
9/25/2007	1067	Tiffany Jackson	$250.00
10/1/2007	1068	Byron Perkins	$500.00
10/3/2007	1069	Tomiko Fisher	$150.00
10/4/2007	1070	Adolphus Pruitt II	$3,000.00
10/4/2007	1072	Irene Hughes	$400.00

10/4/2007	1073	Sharona Dobbs	$600.00
10/4/2007	1074	AD French and Associates	$1,500.00
10/11/2007	1079	Alzalce Henderson	$200.00
10/17/2007	1077	Antankika M	$2,500.00
10/17/2007	1078	Evelyn Sutton	$300.00
10/17/2007	1082	Anthony White	$300.00
10/29/2007	1083	Daphne Garrett – Campaign Worker	$300.00
11/1/2007	1084	Adolphus Pruitt II	$3,000.00
11/2/2007	1087	Tiffany Baker	$1,000.00
11/2/2007	1088	Byron Perkins	$1,000.00
11/15/2007	1090	AD French and Associates	$1,500.00
11/24/2007	1094	Carl Bruce	$500.00
11/27/2007	1095	Irene Hughes	$100.00
12/5/2007	1096	Adolphus Pruitt II	$3,000.00
1/24/2008	Temp Check	Shenese Smith	$500.00
7/2/2008	1170	Jermell Jackson	$24.00
7/2/2008	1172	Charles Prete	$1,000.00
7/3/2008	1171	Charles Prete	$300.00
7/25/2008	1184	Sharon Childs	$104.00
		Total	**$35,518.00**

Expenditures to Airlines and Out of State

Date	**Check**	**Expenditure/Note**	**Amount**
7/19/07	Debit	US Airways	$394.80
7/30/07	Debit	Marriott Philadelphia PA	$525.22
8/17/2007	Debit	Delta Air Atlanta	$208.80
9/4/2007	Debit	American Airlines TX	$1,385.80
9/18/2007	Debit	Westin Hotels Atlanta	$101.23
9/19/2007	Debit	Travelocity	$14.00
9/19/2007	Debit	American Airlines TX	$360.80
9/19/2007	Debit	American Airlines TX	$360.80
9/21/2007	Debit	Hardemart 155 - Delhi LA	$25.90
9/24/2007	Debit	Griffis Truck - Tillatoba, MS	$17.03
9/24/2007	Debit	Outback - Alexandria LA	$67.10
9/24/2007	Debit	Hotels.com TX	$1,539.39
9/27/2007	Debit	Hotwire.com - CA	$307.00
9/28/2007	Debit	American Airlines	$15.00
9/28/2007	Debit	Tony and Joe's Seafood	$141.10
9/28/2007	Debit	American Airlines	$329.40
10/1/2007	Debit	American Airlines	$$15.00
10/1/07	Debit	American Airlines	$122.60

10/1/2007	Debit	Poste Restaurant Washington DC	$133.10
10/2/2007	Debit	The Melrose Hotel Washington DC	$33.81
10/15/2007	Debit	Agent Fee AltAir In'tl	$25.00
10/15/2007	Debit	Agent Fee AltAir In'tl	$25.00
10/15/2007	Debit	Continental Airlines	$563.06
11/6/2007	Debit	Landry's San Antonio	$259.76
11/6/2007	Debit	Priceline.com 1/800-658-1496	$1,181.23
11/7/2007	Debit	Hyatt Hotels San Antonio	$20.90
11/7/2007	Debit	Pat O'Briens San Antonio	$65.67
11/8/2007	Debit	Watermark Pesca San Antonio	$51.95
12/4/2007	Debit	Sheraton Hotels New Orleans	$387.94
12/10/2007	Debit	Marriott Washington DC	$480.56
		Total	**$3,350.58**

Vehicle

28. On September 23, 2007, check number 1065 was paid from the official fund depository to Fast Line Auto in the amount of $6,000.00. The check contained the signature "Joy Camp."

29. The Missouri Department of Revenue has no record of motor vehicle dealer sales for Fast Lane Auto to a purchaser with the last name Hubbard or Camp for the period January through December 2007.

30. The Missouri Department of Revenue has no record of motor vehicle dealer sales for Fast Line Auto, Inc. to a purchaser with the last name Hubbard or Camp for the period January through December 2007.

31. On or about September 12, 2007, the owner of Fast Line Auto, Inc. purchased a 2003 Infinity from the St. Louis Auto Auction.

32. On or about September 23, 2007, the owner received check number 1065 from Salameh Mohammad for partial payment of the 2003 Infinity vehicle.

33. On October 12, 2007, a certificate of title for the 2003 Infinity, was issued by the Missouri Department of Revenue. The Certificate of Title reported a purchase date of September 14, 2007.

34. Respondents produced in committee records a Gateway Vehicle Inspection Program form on January 14, 2008 at St. Louis Auto & Truck Repair for a Vehicle VIN Number which matched a 2001 Dodge Van.

35. The invoice from St. Louis Auto & Truck Repair listed the same 2001 Dodge Van with the identified VIN Number.

36. On April 28, 2008, Rodney Hubbard purchased the 2001 Dodge Van from Salameh Mohammad, which vehicle was registered in Respondent Rodney Hubbard's name on May 15, 2008. The purchase price was reported as $2,000.00.

37. The Dodge Van was originally purchased by Salameh Mohammad on September 19, 2007.

38. On June 28, 2008, St. Louis Auto & Truck Repair invoiced Respondent Hubbard for $2,207.43 for service on the 2001 Dodge van.

39. On June 11, 2008, Respondents paid St. Louis Auto & Truck Repair $1,000.00 which was reported on the committee's July 2008 Quarterly Report as "Canvassing Van."

40. On July 8, 2008, Respondents paid St. Louis Auto & Truck Repair $1,207.43 which was reported on the committee's 8 Day Before Primary Report as "Canvassing Van."

41. Respondents failed to provide committee records to support a expenditure, including, but not limited to, check number 1065 in the amount of $6,000.00 on September 23, 2007, or committee records to support the expenditure or in-kind contribution in the amount of $2,000.00 for a 2001 Van.

42. Respondents failed to report check number 1065 on September 23, 2007. in the amount of $6,000.00 with the full name, mailing and the purpose of the expenditure.

43. Respondents failed to report an expenditure in the amount of $2,000.00 for a 2001 Dodge Van, or an in-kind contribution in the amount of $2,000.00 for use of a 2001 Dodge Van.

Expenditures Reported Which Do Not Appear as Reported in the Official Fund Depository

44. Respondents reported the following expenditures on campaign finance disclosure reports which were not expended as reported into the official fund depository as required by §130.021.4. (1), RSMo:

Date	**Expenditure**	**Amount**	**Reported**	**Description**
6/29/2007	Styles Clothing	$500.00	JulyQ07	Purpose: T-shirts
6/29/2007	Clear Channel	$1,500.00	JulyQ07	Purpose: Radio Advertising
7/20/2007	Alicia Purtty	$250.00	OctQ07	Donaton/Funeral; s/b Pruitt
12/28/2007	TABBAB Corp	$350.00	JanQ08	Refund
12/28/2007	Major Brands, Inc	$1,850.00	JanQ08	Refund
12/28/2007	Freeman R. Bosley, JR	$750.00	JanQ08	Refund
12/28/2007	Stone, Leyton & Gershman	$4,350.00	JanQ08	Refund
12/28/2007	Committee to Elect El-Amin	$4,350.00	JanQ08	Refund
3/5/2008	Coleman for Representative	$325.00	AprlQ08	
5/5/2008	O.R. Pechman Co, Inc.	$12,000.00	30Day After	O.R. Pechman Co, Inc.
7/3/2008	Laborers Union Local 42	$300.00	8Day Before	
7/8/2008	Cheryl Jackson	$184.00	8Day Before	Paid by 58th Dem 7/11/08
7/8/2008	Alzalce Henderson	$164.00	8Day Before	Paid by 58th Dem 7/11/08
7/8/2008	Evelyn Sutton	$132.00	8Day Before	Paid by 58th Dem 7/11/08
7/8/2008	Marsha Dinkins	$88.00	8Day Before	Paid by 58th Dem 7/11/08
7/8/2008	Samella Bolden	$128.00	8Day Before	Paid by 58th Dem

				7/11/08
7/8/2008	Ebony Washington	$368.00	8Day Before	Paid by 58th Dem 7/11/08
7/8/2008	Rochelle Bronaugh	$96.00	8Day Before	Paid by 58th Dem 7/11/08
7/1/2008	Alzalce Henderson	$116.00	8Day Before	Paid by 58th Dem 6/27/08
7/1/2008	Evelyn Sutton	$168.00	8Day Before	Paid by 58th Dem 6/27/08
7/1/2008	Ebony Washington	$240.00	8Day Before	Paid by 58th Dem 6/27/08
7/1/2008	Debbie Tilson	$24.00	8Day Before	Paid by 58th Dem 6/27/08
7/1/2008	Debbie Tilson	$104.00	8Day Before	
7/1/2008	Shirley James	$152.00	8Day Before	Paid by 58th Dem 6/27/08
7/1/2008	Cherrie Irons	$24.00	8Day Before	Paid by 58th Dem 6/27/08
7/1/2008	Catherine Morgan	$152.00	8Day Before	Paid by 58th Dem 6/27/08
7/3/2008	Samuel Terrell	$24.00	8Day Before	Paid by 58th Dem 6/27/08
7/3/2008	David Thomas	$24.00	8Day Before	Paid by 58th Dem 6/27/08
7/3/2008	Salim Pruitt	$24.00	8Day Before	Paid by 58th Dem 6/27/08
7/3/2008	Gary Williams	$24.00	8Day Before	Paid by 58th Dem 6/27/08
7/3/2008	YC Young	$152.00	8Day Before	Paid by 58th Dem 6/27/08
7/3/2008	Sarah Reed	$48.00	8Day Before	
7/30/08	O.R.Perchman	$14,000.00	30 Day After	
8/5/2008	6th Ward Democratic Organization	$500.00	30Day After	Paid by 58th Dem 8/1/08
8/5/2008	2nd Ward Regular Democratic Club	$500.00	30Day After	Paid by 58th Dem 8/1/08
8/5/2008	14th Ward Democratic Club	$500.00	30Day After	Paid by 58th Dem 8/1/08
8/5/2008	18th Ward Regular Democratic Org	$500.00	30Day After	Paid by 58th Dem 8/1/08
8/8/2008	28th Ward Democratic Organization	$500.00	30Day After	Paid by 58th Dem 8/1/08
	Total	**$45,461.00**		

45. Respondents failed to accurately report the following expenditures:

Date	Item	Expenditure	Amount
3/14/2008	1123	Expenditure to Joy Camp - Reported as "Knockout Bar and Grill" on the April 08 Quarterly Report	$5,007.00
5/31/2008	1140	Expenditure to 100 Black Men St. Louis – Reported as "AD French & Assoc LLC" on the July 08 Quarterly Report	$500.00
7/25/2008	1187	Expenditure to AD French and Associates – Reported as "Economic mail" on 7/23/08 on the 8Day Before Primary Election Report	$1,783.32
		Total	**$7,290.32**

46. Respondents reported the following expenditures which were paid from the official fund of the 58th Legislative District Committee, a political party committee registered under Chapter 130:

Date	Expenditure	Amount	Report filed by Hubbard for Senate	Paid by Respondent
7/8/2008	Alzalce Henderson	$164.00	8Day Before	Paid by 58th Dem 7/11/08
7/8/2008	Marsha Dinkins	$88.00	8Day Before	Paid by 58th Dem 7/11/08
7/8/2008	Ebony Washington	$368.00	8Day Before	Paid by 58th Dem 7/11/08
7/1/2008	Alzalce Henderson	$116.00	8Day Before	Paid by 58th Dem 6/27/08
7/1/2008	Evelyn Sutton	$168.00	8Day Before	Paid by 58th Dem 6/27/08
7/1/2008	Ebony Washington	$240.00	8Day Before	Paid by 58th Dem 6/27/08
7/1/2008	Debbie Tilson	$24.00	8Day Before	Paid by 58th Dem 6/27/08

7/1/2008	Shirley James	$152.00	8Day Before	Paid by 58th Dem 6/27/08
7/1/2008	Catherine Morgan	$152.00	8Day Before	Paid by 58th Dem 6/27/08
7/3/2008	Samuel Terrell	$24.00	8Day Before	Paid by 58th Dem 6/27/08
7/3/2008	David Thomas	$24.00	8Day Before	Paid by 58th Dem 6/27/08
7/3/2008	Salim Pruitt	$24.00	8Day Before	Paid by 58th Dem 6/27/08
7/3/2008	Gary Williams	$24.00	8Day Before	Paid by 58th Dem 6/27/08
7/3/2008	YC Young	$152.00	8Day Before	Paid by 58th Dem 6/27/08
8/5/2008	18th Ward Regular Democratic Org	$500.00	30Day After	Paid by 58th Dem 8/1/08
8/8/2008	28th Ward Democratic Organization	$500.00	30Day After	Paid by 58th Dem 8/1/08
	Total	**$2,720.00**		

Cash Contributions

47. The following cash deposits in excess of $100.00 were made into the official fund depository:

Date	**Description of Deposit**	**Amount**
7/2/2007	CASH	$861.00
7/6/2007	CASH	$550.00
1/24/2008	CASH	$14,050.00
2/8/2008	CASH	$225.00
4/1/2008	CASH	$200.00
4/1/2008	CASH	$1,500.00
5/10/2008	CASH	$685.00
5/13/2008	CASH	$340.00
6/26/2008	CASH	$1,000.00
	TOTAL	**$19,411.00**

48. Respondents reported the following contributions which were $100.00 or less from a single contributor on campaign finance disclosure statements, which could not be identified as having been made by check or other negotiable instrument:

Date on Report	Contributor	Amount	Report
6/29/2007	Ashli Thomas	$25.00	JulyQ07
6/29/2007	Daniel MBA	$25.00	JulyQ07
6/29/2007	L. Howard	$25.00	JulyQ07
6/29/2007	Bard Rivers	$25.00	JulyQ07
6/29/2007	Jerome King	$25.00	JulyQ07
6/29/2007	Anthony Winston	$25.00	JulyQ07
6/29/2007	Ebony Washington	$25.00	JulyQ07
6/29/2007	Karen Combs	$100.00	JulyQ07
6/29/2007	Jackie Combs	$25.00	JulyQ07
6/29/2007	Parthenim White	$25.00	JulyQ07
6/29/2007	LaTonia Collins	$25.00	JulyQ07
6/29/2007	Richard Brooks	$25.00	JulyQ07
6/29/2007	Stacy Stevens	$100.00	JulyQ07
6/29/2007	Minnie Cain	$25.00	JulyQ07
6/29/2007	Denise Cain	$25.00	JulyQ07
6/29/2007	Steve Smith	$50.00	JulyQ07
6/29/2007	Brandon N	$25.00	JulyQ07
6/29/2007	Ron Casey	$25.00	JulyQ07
6/29/2007	Terran Austin-El	$25.00	JulyQ07
6/29/2007	Quincy L Cox	$25.00	JulyQ07
6/29/2007	Garfield Hubbard	$25.00	JulyQ07
6/29/2007	Theophilus Peeked	$25.00	JulyQ07
6/29/2007	Zerrick Blakely	$25.00	JulyQ07
6/29/2007	Darryl Scott	$25.00	JulyQ07
6/29/2007	Kimberly Hubbard	$25.00	JulyQ07
6/29/2007	Mallory Hubbard	$25.00	JulyQ07
6/29/2007	Ron Vernell	$25.00	JulyQ07
6/29/2007	Andriette Fields	$25.00	JulyQ07
6/29/2007	Shamonica Darden	$25.00	JulyQ07
6/29/2007	Marilyn Hubbard	$25.00	JulyQ07
6/29/2007	Dayn Lusk	$25.00	JulyQ07
6/29/2007	Malvin Young	$25.00	JulyQ07
6/29/2007	Brittany Hubbard	$50.00	JulyQ07

6/29/2007	Travis Reems	$50.00	JulyQ07
6/29/2007	Ashley Hubbard	$25.00	JulyQ07
6/29/2007	Shai Key	$25.00	JulyQ07
6/29/2007	Shirley Finley	$25.00	JulyQ07
6/29/2007	Mobil Mart	$25.00	JulyQ07
6/29/2007	Rochelle Hearn	$50.00	JulyQ07
6/29/2007	Jim Kim	$25.00	JulyQ07
6/29/2007	Daniel Bush	$25.00	JulyQ07
6/29/07	Hakeem Savage	$25.00	JulyQ07
6/29/2007	Malra Rutlin	$25.00	JulyQ07
6/29/07	Columbus Edwards	$25.00	JulyQ07
12/20/2007	Lamont Johnson	$25.00	JanQ08
12/20/2007	Mallory Hubbard	$25.00	JanQ08
12/20/2007	Eji Hieme	$25.00	JanQ08
12/20/2007	Jihan Smith	$25.00	JanQ08
12/20/2007	Quincy Smith	$25.00	JanQ08
12/20/2007	Toni Hopson	$25.00	JanQ08
12/20/2007	Judith Pruitt	$25.00	JanQ08
12/20/2007	Brenilda Melendez	$25.00	JanQ08
12/20/2007	Ronald Roberts	$100.00	JanQ08
12/20/2007	Lashaunda Washington	$25.00	JanQ08
12/20/2007	Theophilus Peek-EL	$25.00	JanQ08
12/20/2007	Hubert Hoosman	$25.00	JanQ08
12/20/2007	Peggy Ryan	$25.00	JanQ08
12/20/2007	Meredith Walker	$25.00	JanQ08
12/20/2007	Anne Faber	$50.00	JanQ08
12/20/2007	Floyd Irons	$25.00	JanQ08
12/20/2007	V. John Cross	$50.00	JanQ08
12/20/2007	Doreen Gordon	$30.00	JanQ08
3/28/2008	Network In Human Services Inc.	$100.00	AprlQ08
	Total	**$2,030.00**	

Cash Expenditures

49. Respondents made the following cash withdrawals from the official fund depository as follows:

Date	Transaction Type	Location of Cash Transaction	Amount
6/22/2007	Withdrawal	Cash	$800.00
6/27/2007	Withdrawal	Cash	$1507.00
7/10/2007	ATM	CASH	$40.00
9/12/2007	ATM	Cash	$440.00
12/10/2007	ATM	CASH (Natural Bridge stl)	$201.95
12/27/2007	ATM	CASH (Tucker branch)	$40.00
12/27/2007	ATM	CASH (Tucker branch)	$360.00
12/31/2007	ATM	CASH (Tucker branch)	$400.00
12/31/2007	ATM	CASH (Tucker branch)	$500.00
1/2/2008	ATM	CASH (426 Brooks ST JC MO)	$201.50
1/7/2008	ATM	CASH (Tucker branch)	$300.00
1/7/2008	ATM	CASH (Tucker branch)	$300.00
1/11/2008	ATM	CASH (Tucker branch)	$500.00
2/5/2008	ATM	CASH	$100.00
2/6/2008	ATM	CASH (Tucker branch)	$300.00
2/25/2008	ATM	CASH (Chicago Heights IL)	$142.50
3/4/2008	ATM	CASH JC MO	$100.00
3/10/2008	ATM	CASH (St Louis)	$100.00
3/10/2008	ATM	CASH (Tucker branch)	$100.00
3/13/2008	ATM	CASH (1940 W MAIN JC MO)	$102.00
3/31/2008	ATM	CASH (St Louis)	$300.00
4/7/2008	ATM	CASH (St Louis)	$300.00
5/12/2008	ATM	CASH (Lindell Blvd)	$102.00
5/14/2008	ATM	CASH (JC MO)	$300.00
5/20/2008	ATM	CASH (Tucker branch)	$100.00
5/30/2008	ATM	CASH (Tucker branch)	$100.00
6/2/2008	ATM	CASH (Tucker branch)	$500.00
6/9/2008	ATM	CASH (400 S 14th)	$202.50
6/9/2008	ATM	CASH (400 S 14th)	$202.50
6/10/2008	ATM	CASH (Tucker branch)	$500.00
6/16/2008	ATM	CASH (St Louis)	$100.00
6/19/2008	ATM	CASH (St Louis)	$100.00
6/20/2008	ATM	CASH (400 S 14th)	$202.50
6/26/2008	ATM	CASH (St Louis)	$40.00

6/26/2008	ATM	CASH (St Louis)	$40.00
6/26/2008	ATM	CASH (St Louis)	$420.00
6/27/2008	ATM	Cash (3211 Clark Ln, Columbia)	$102.00
6/30/2008	Counter Withdrawal	CASH	$687.00
7/1/2008	Counter Withdrawal	CASH	$50.00
7/2/2008	ATM	CASH	$300.00
7/9/2008	ATM	CASH (Tucker branch)	$100.00
7/11/2008	ATM	CASH (Tucker branch)	$100.00
7/11/2008	ATM	CASH (Tucker branch)	$200.00
7/15/2008	ATM	CASH (Tucker branch)	$500.00
7/17/2008	ATM	CASH (1444 N 14th)	$102.00
7/22/2008	ATM	CASH (St Louis)	$300.00
7/24/2008	ATM	CASH (Tucker branch)	$100.00
7/25/2008	ATM	CASH (Tucker branch)	$400.00
7/28/2008	ATM	CASH (St Louis)	$300.00
7/28/2008	ATM	CASH (St. Louis	$200.00
7/31/2008	Cash from deposit	CASH from deposit made	$350.00
7/31/2008	ATM	CASH (St Louis)	$500.00
8/1/2008	ATM	CASH (St Louis)	$500.00
8/8/2008	ATM	CASH - Flamingo, Las Vegas, NV	$304.99
8/11/2008	ATM	CASH - Golden Nuggett, Las Vegas, NV	$503.50
9/16/2008	ATM	CASH (Tucker branch)	$100.00
10/24/2008	Check: #1204	CASH	$13,021.00
10/24/2008	ATM	CASH (Tucker branch)	$500.00
10/26/2008	Check: #1206	CASH	$100.00
10/27/2008	Check: #1205	CASH	$1,007.00
		Total	**$30,371.94**

50. Respondents issued three checks totaling $14,128.00 from the official fund depository, payable to cash in excess of $50.00, and signed by Respondent Camp and endorsed by Respondent Camp, as detailed in paragraph 49. Respondents failed to report the purpose of the transactions as required by 130.041.1(4)(d), RSMo.

51. Cash was withdrawn fifty-two times from the committee's official fund depository through Automatic Transaction Machines (ATM) transactions from the depository, totaling $12,849.94 as detailed in paragraph 49. Respondents failed to report the purpose of the transactions as required by 130.041.1(4)(d), RSMo.

52. Cash was withdrawn from the committee's official fund depository through a "counter withdrawal" four times for a total of $3,044.00 as detailed in paragraph 49. On July 31, 2008, $350.00 was received from a deposit of $600.00. Respondents failed to report the purpose of the transactions as required by 130.041.1(4)(d), RSMo.

53. Cash withdrawals and expenditures in 2007 and 2008 were in excess of the lesser of $5,000.00 or ten percent of all expenditures made by the committee during those calendar years.

Consulting Services

54. The following expenditures were made or reported to A.D. French & Associates and to Antonio French. Respondents as made to A.D. French & Associates:

Check	Date	Expenditure	Amount	Reported	Purpose
1039	8/13/2007	AD French and Associates	$1,500.00	Oct Q07	Campaign Manager
1058	9/15/2007	AD French and Associates	$1,500.00	Oct Q07	Campaign Worker
1074	10/4/2007	AD French and Associates	$1,500.00	No	
1090	11/15/2007	AD French and Associates	$1,500.00	No	
1101	1/7/2008	Antonio French	$1,500.00	Amended AprQ08 (CD8Form)	Campaign Consultant/ Campaign

					Manager/ Public Relations
1108	2/4/2008	Antonio French	$1,500.00	Amended AprQ08 (No CD8 Form)	Campaign Consultant
1122	3/10/2008	AD French and Associates	$400.00	Amended AprQ08(No CD8 Form)	Campaign Consultant (media consultant)
	6/6/2008	AD French and Associates	$400.00	Amended July Q08	Campaign Manager
	7/18/2008	AD French and Associates	$5000.00	Amended 8 Day Before Primary	Campaign Manager
	8/15/2008	AD French and Associates	$5000.00	Amended 30 Day after Primary	Campaign Manager
		Total	**$19,800.00**		

CONCLUSIONS OF LAW

Failure to Maintain Accurate and Complete Records

1. Section 130.034, RSMo provides as follows concerning the use of contributions by a committee established under Chapter 130 as follows:

> 1. Contributions as defined in section 130.011, received by any committee shall not be converted to any personal use.
>
> 2. 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;

(8) Except when such candidate, former candidate or holder of elective office dies while the committee remains in existence, the committee may make an unconditional gift to a fund established for the benefit of the spouse and children of the candidate, former candidate or holder of elective office. The provisions of this subdivision shall expire October 1, 1997.

2. §130.036. 1, RSMo, requires a candidate, treasurer or deputy treasurer to maintain accurate and records of accounts and records of a committee to prepare and substantiate a campaign finance report filed by the Committee as follows:

> 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...

3. According to §130.036. 8, RSMo, in pertinent part:

> All records and accounts of receipts and expenditures shall be preserved for at least three years after the date of the election to which the records pertain. Records and accounts regarding supplemental disclosure reports or reports not required pursuant to an election shall be preserved for at least three years after the date of the report to which the records pertain. Such records shall be available for inspection by the campaign finance review board and its duly authorized representatives.

4. There is probable cause the Respondents violated §130.036. 1., RSMo by failing to maintain accurate records and accounts for Respondent Committee, including 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, and that Respondents did so knowingly.

Failure to Timely File Campaign Finance Disclosure Reports

5. §130.046. 1, RSMo provides:

> The disclosure reports required by section 130.041 for all committees shall be filed at the following times and for the following periods:
>
> ...
>
> (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; except that, a successful candidate who takes office prior to the twenty-fifth day after the election shall have complied with the report requirement of this subdivision if a disclosure report is filed by such candidate and any candidate committee under the candidate's control before such candidate takes office, and such report shall be for the period closing on the day before taking office;

6. There is probable cause that Respondents have violated §130.046. 1, RSMo by failing to file timely a thirty day after election report, originally due on September 4, 2008, on October 10, 2008, an October 2008 Limited Activity Report, originally due on October 15, 2008, on October 27, 2008, Limited Activity Statements for January and April 2009 on April 26, 2009, both reports originally due on April 15, 2009, and an October 2009 Limited Activity Statement, originally due on October 15, 2009, on October 26, 2009, and that Respondents did so knowingly.

Improper Filing of Limited Activity Reports for January and April 2009

7. §130.046. 5(2), RSMo provides when a statement of limited activity can be file by a committee as follows:

> Notwithstanding any other provisions of this chapter to the contrary:
>
> (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.

8. There is probable cause that Respondents have violated §130.046.5(2), RSMo when Respondents filed a January and April 2009 Limited Activity Statement when Respondents were required to file a full campaign finance disclosure report, and that Respondents did so knowingly.

Failure to Accurately Report Contributions Received

9. According to § 130.041.1(3)(a) , 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. In addition, the candidate committee shall make a reasonable effort to obtain and report the employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received one or more contributions which in the aggregate total in excess of one hundred dollars and shall make a reasonable effort to obtain and report a description of any contractual

relationship over five hundred dollars between the contributor and the state if the candidate is seeking election to a state office or between the contributor and any political subdivision of the state if the candidate is seeking election to another political subdivision of the state;

10. According to §130.021.4. (1), RSMo:

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... All contributions which the committee receives in money, checks and other negotiable instruments shall be deposited in a committee's official depository account. 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. ...

11. According to §130.031.1, RSMo:

No contribution of cash in an amount of more than one hundred dollars shall be made by or accepted from any single contributor for any election by a continuing committee, a campaign committee, a political party committee, an exploratory committee or a candidate committee.

12. There is probable cause that Respondents have violated §130.041.1(3)(a) , RSMo by failing to report contributions totaling $85,850.46, including the name, address, employer or occupation of the contributor which were deposited into the official fund depository, and by reporting $16,280.00 in contributions which were not deposited into the official fund depository.

Failure to Accurately Report Expenditures

13. §130.041. 1(4)(d), RSMo provides:

§130.041. 1. 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:

(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.

14. §130.021.4. (1), RSMo provides that all expenditures shall be made by or through an official fund depository and committee treasurer or candidate.

15. According to § 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. A single expenditure from a petty cash fund shall not exceed fifty dollars, and the aggregate of all expenditures from a petty cash fund during a calendar year shall not exceed the lesser of five thousand dollars or ten percent of all expenditures made by the committee during that calendar year. A check made payable to "cash" shall not be made except to replenish a petty cash fund.

16. §130.031.3, RSMo provides that no expenditure shall be made or incurred, directly or indirectly, in a fictitious name, in the name of another person, or by or through another person in such a manner as to conceal the identity of the actual source of the contribution or the actual recipient and purpose of the expenditure.

17. There is probable cause to believe that Respondents violated §130.041. 1(4)(d), RSMo by failing to report $129,351.88 in expenditures, including the name and address of each to whom the expenditure was made or incurred from the official fund depository as listed in paragraphs 50 and 51, and by reporting $45,461.00 in expenditures which were not expended from the official fund depository, and by failing to accurately report expenditures in the amount of $7,290.32 and that Respondents did so knowingly.

Cash Contributions

18. According to §130.031.1, RSMo:

> No contribution of cash in an amount of more than one hundred dollars shall be made by or accepted from any single contributor for any election by a continuing committee, a campaign committee, a political party committee, an exploratory committee or a candidate committee.

19. §130.041. 1 (3), RSMo, requires that the candidate committee report the name and mailing address, and shall make a reasonable effort to obtain and report the employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received one or more contributions which in the aggregate total in excess of one hundred dollars.

20. There is probable cause to believe that Respondents violated §130.031.1, RSMo and §130.041.1 (3), RSMo by receiving cash contributions into the official fund depository in excess of $100.00 and by failing to report contributions which were $100.00 or less from a single contributor, in the amount of the cash deposits, and that Respondents did so knowingly.

Cash Expenditures

21. According to § 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. A single expenditure from a petty cash fund shall not exceed fifty dollars, and the aggregate of all expenditures from a petty cash fund during a calendar year shall not exceed the lesser of five thousand dollars or ten percent of all expenditures made by the committee during that calendar year. A check made payable to "cash" shall not be made except to replenish a petty cash fund.

22. There is probable cause to believe that Respondents Rodney Hubbard, Joy Camp and Hubbard for Senate §130.031.2, RSMo by issuing three checks to cash, totaling $14,128.00 from the official fund depository, and by withdrawing cash totaling $16,243.94 from the official fund depository, which exceeded $50 for single transactions, and the aggregate which exceeded 10% of all expenditures made by the committee during that calendar year, and that Respondents did so knowingly.

Consulting Services

23. According to §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.

24. There is probable cause the Respondents violated §130.041.4, RSMo by failing to report $3,000.00, and improperly reporting $16,800.00 in expenditures to an independent contractor as "campaign consultant" and "campaign manager" and by failing to include identification of the specific service or services provided, and that Respondents did so knowingly.

ORDER

The Commission finds probable cause that Respondents Rodney Hubbard, Joy Camp and Hubbard for Senate knowingly violated, and have knowingly violated §130.036.1, RSMo, §130.046.1, RSMo, §130.046.5(2), RSMo, §130.041.1(3)(a), RSMo, §130.041.1(4)(d), RSMo, §130.031.1 RSMo, §130.041.1(3), RSMo, §130.031.2, RSMo and §130.041.4, RSMo.

It is the order of the Missouri Ethics Commission that a fee is imposed against the Respondents Rodney Hubbard, Joy Camp and Hubbard for Senate in the amount of $322,000 pursuant to §105.961.4(6) RSMo. However, if either Respondent pays $32,200 of that fee within ninety (90) days after the date of the Order, the remainder of the fee will be stayed for two years, subject to the provisions below.

If Respondents Rodney Hubbard, Joy Camp or Hubbard for Senate have not committed any further violations of the campaign finance disclosure laws pursuant to Chapter 130, RSMo 2000, during the two year stay then Respondents will not be required to pay the balance of this fee.

If, however, either Respondent Rodney Hubbard, Joy Camp or Hubbard for Senate is found to have violated the campaign finance laws pursuant to Chapter 130, RSMo 2000, during this two year stay, Respondents Rodney Hubbard, Joy Camp and Hubbard for Senate will be required to pay the balance of the fee as originally imposed by the Commission. The amount of the balance will be due immediately upon final adjudication finding probable cause of such a violation.

Date: 12/13/10

Jim Wright, Chairman
MISSOURI ETHICS COMMISSION