

behalf at the hearing; and the right to a decision upon the record of the hearing. Being aware of these rights provided to Respondents by operation of law, the undersigned Respondents knowingly and voluntarily waive each and every one of these rights and freely enter 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 agree to abide by the terms of this document.

I.

Based upon the foregoing, the Petitioner and the undersigned Respondents jointly stipulate to the following and request that the Missouri Ethics Commission adopt as its own the Joint Proposed Findings of Fact and the 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. Respondent Stafford was an unsuccessful candidate for State Representative in the August 7, 2012 primary election.
3. Respondent Committee to Elect Erik Stafford was a candidate committee formed by Respondent to support his candidacy in the August 7, 2012 election.
4. Respondents are required to file campaign finance disclosure reports and statements with the Missouri Ethics Commission. § 130.011(1); § 130.026.2(3), RSMo.
5. Pursuant to Section 105.961, RSMo, the Commission’s staff has investigated a complaint filed with the Commission and reported the investigation’s findings to the Commission.

6. Respondent Stafford and Committee to Elect Erik Stafford published, circulated, and/or distributed the flyers, attached hereto as Exhibit A, by handing them out to voters at polling locations.

7. Respondent Committee to Elect Erik Stafford paid for the printed matter attached hereto as Exhibit A.

8. The printed matter attached hereto as Exhibit A relates to a candidate in the August 2012 election.

9. The flyer attached hereto as Exhibit A should have contained a clear and conspicuous statement: "Paid for by Committee to Elect Erik Stafford, Lynne Griffin, Treasurer," but it did not.

JOINT PROPOSED CONCLUSIONS OF LAW

10. "Any person publishing, circulating, or distributing any printed matter relative to any candidate for public office or any ballot measure shall on the face of the printed matter identify in a clear and conspicuous manner the person who paid for the printed matter with the words 'Paid for by' followed by the proper identification of the sponsor pursuant to this section." § 130.031.8, RSMo.

11. "'[P]rinted matter' shall be defined to include any pamphlet, circular, handbill, sample ballot, advertisement, including advertisements in any newspaper or other periodical, sign, including signs for display on motor vehicles, or other imprinted or lettered material...." § 130.031.8, RSMo.

12. In regard to any printed matter paid for by a committee, it shall be sufficient identification to print the name of the committee ... and the name and title of the committee treasurer who was serving when the printed matter was paid for. § 130.031.8(2), RSMo.

13. There is probable cause to believe that Respondents Stafford and Committee to Elect Erik Stafford violated Section 130.031.8, RSMo, by printing, circulating and distributing the flyers attached hereto as Exhibit A without including an accurate “paid for by” disclosure on them.

II.

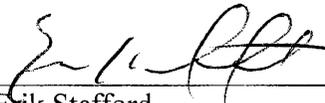
Based on the foregoing, the parties hereto mutually agree and stipulate that the following shall constitute the order entered by the Missouri Ethics Commission in this matter. This order will be effective immediately upon the issuance of the Consent Order of the Missouri Ethics Commission without further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

1. The parties to this Joint Stipulation understand that the Petitioner will maintain this Joint Stipulation as an open and public record of the Missouri Ethics Commission.
2. The Commission shall issue its Consent Order in the form attached hereto as Exhibit B.
 - a. Respondents shall comply with all relevant sections of Chapter 130, RSMo.
 - b. It is the Order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$100.00 to be paid on or before May 21, 2013, pursuant to Section 105.961.4(6), RSMo.
3. 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 action.
4. Respondents, together with their heirs, successors, and assigns, do 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 Respondents or Respondents' attorney may now have or which they may hereafter have, which are based upon or arise out of the above cases.

5. This joint stipulation does not settle, release, waive, or otherwise relieve Respondents from any late filing fees due to the appropriate filing authority, including Petitioner Missouri Ethics Commission. Respondents understand that late filing fees accrue automatically under Section 105.963, RSMo.

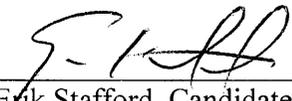
RESPONDENT ERIK STAFFORD

Petitioner

By:  5/5/2013
Erik Stafford Date

By:  5/14/2013
Stacey Heislen Date
Acting Executive Director

RESPONDENT COMMITTEE TO ELECT
ERIK STAFFORD

By:  5/5/2013
Erik Stafford, Candidate Date

By:  5/14/2013
Curtis R. Stokes Date
Attorney for Petitioner

VOTE
ERIK
STAFFORD
 MISSOURI HOUSE OF
 REPRESENTATIVES
 23RD
 DISTRICT

VOTE AUGUST 7
ERIK STAFFORD

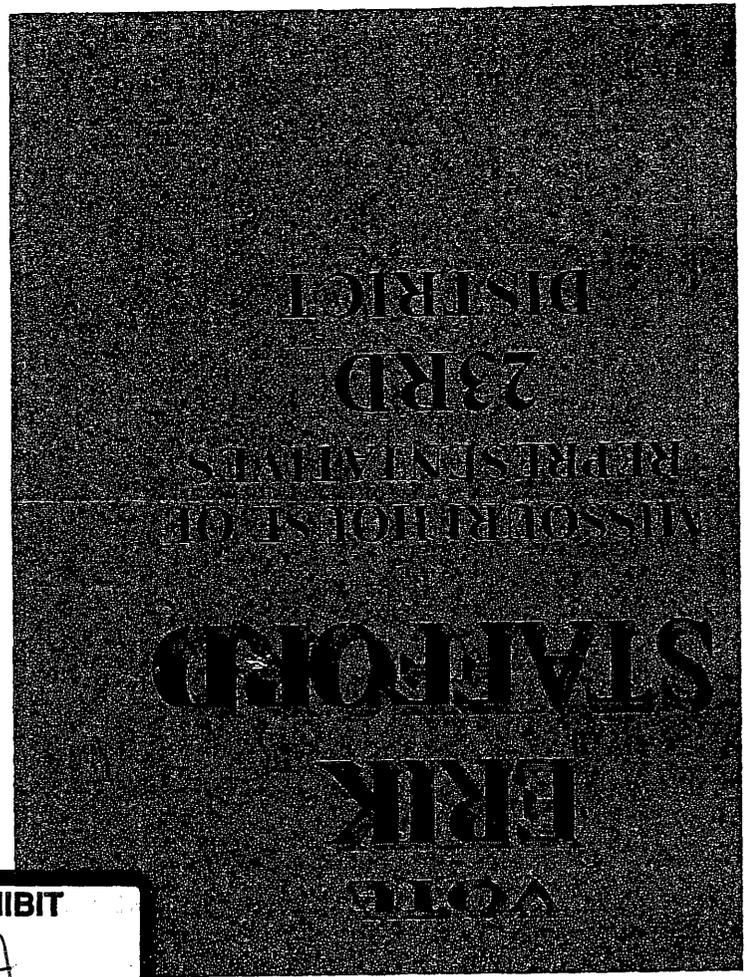
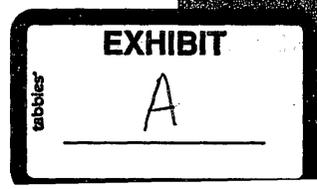


MISSOURI HOUSE OF REPRESENTATIVES
 23RD DISTRICT

ONCE ELECTED I WILL FIGHT TO DO THE
 FOLLOWING:

- Improve the literacy rates of our children
- Rebuild our community through economic development programs
- Help restore the rights of convicted felons who have paid their debt to society
- Develop productive and safe activities for our youth

VOTESTAFFORD4THEMISSOURIHOUSE@GMAIL.COM
 816-286-5298



SO ORDERED this 14th day of May, 2013

By:

A handwritten signature in cursive script that reads "Dennis C. Rose". The signature is written in black ink and is positioned above a horizontal line.

Dennis Rose, Chair
Missouri Ethics Commission