

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,            )  
                                                  )  
                                          Petitioner,    )  
                                                  )  
v.                                                )    Case No. 12A121, 12E111  
                                                  )  
REDDIT HUDSON,                         )  
Candidate                                 )  
                                                  )  
and                                            )  
                                                  )  
CITIZENS TO ELECT REDDITT            )  
HUDSON,                                 )  
Candidate Committee                    )  
                                                  )  
                                          Respondents.    )

**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 Respondents acknowledge that they have received and reviewed a copy of the Complaint filed by the Petitioner in this case, and the parties submit to the jurisdiction of the Missouri Ethics Commission.

The undersigned Respondents further acknowledge that they are aware of the various rights and privileges afforded by law, including but not limited to: the right appear and be represented by counsel; the right to have all charges against Respondents be proven upon the record by competent and substantial evidence; the right to cross-examine any witnesses appearing at the hearing against Respondents; the right to present evidence on Respondents' 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 Hudson was an unsuccessful candidate in the August 2012 primary election for Missouri Senate, District 13.

3. Respondent Hudson filed a statement of committee organization for Citizens to Elect Redditt Hudson, to support his candidacy in the August 2012 primary election on October 24, 2011. Respondents filed a termination statement on November 23, 2012.

4. Pursuant to Section 130.026.2, RSMo, the Missouri Ethics Commission is and was at all relevant times the appropriate officer for Respondents to file statements and reports.

5. Pursuant to Section 105.961, RSMo, the Commission’s staff investigated a complaint filed with the Commission and investigated the reports and statements filed with the Commission, and reported the investigations’ findings to the Commission.

6. Based on the report of the Commission's staff, the Commission determined that there are reasonable grounds to believe that violations of law occurred, and it therefore authorized a hearing in this matter pursuant to Section 105.961.3, RSMo.

### COUNT I

#### *Failure to timely file statement of committee organization*

7. Respondents opened an official fund depository on August 8, 2011.
8. Respondents made aggregate expenditures exceeding \$500 on September 9, 2011.
9. Respondents accepted aggregate contributions exceeding \$500 on September 13, 2011.
10. Respondents filed a statement of committee organization for Citizens to Elect Redditt Hudson on October 24, 2011, which is seventy-seven (77) days after August 8, 2011, and more than twenty (20) days after the aggregate contributions and expenditures exceeded \$500.00.

### COUNT II

#### *Failure to timely file campaign finance disclosure reports and accurately report cash on hand*

11. Respondents failed to timely file the following campaign finance disclosure reports:

<b>Report</b>	<b>Report Due</b>	<b>Report Filed</b>	<b>Days Late</b>
October 2011 Quarterly	10/17/2011	11/4/2012	18
January 2012 Quarterly	1/17/2012	1/18/2012	1
April 2012 Quarterly	4/16/2012	4/23/2012	7

12. Respondents reported cash on hand at the beginning of the reporting period on their April 2012 quarterly report as \$1,912.77, but for the previous reporting period, Respondents reported cash on hand at the end of the reporting period as \$1,213.86.

**COUNT III**

*Failure to timely and accurately report contributions*

13. Respondents failed to report the following two contributions, totaling \$271.00, on campaign finance reports:

<b>Bank Statement</b>	<b>Date on Check</b>	<b>Item #</b>	<b>Contributor</b>	<b>Amount</b>
November 2011	11/14/2011		Cash Deposit	\$21.00
March 2012	3/3/2012	4181	Annette Slack	\$250.00
			<b>TOTAL</b>	<b>\$271.00</b>

14. Respondents failed to report the address and/or employer for the following contributions:

<b>Bank Statement</b>	<b>Date on Check</b>	<b>Contributor</b>	<b>Amount</b>
8/8/11-9/30/11	9/19/2011	Journal Entry	\$30.00
8/8/11-9/30/11	9/30/2011	Journal Entry	\$30.00
10/1/11-10/31-11	10/26/2011	ACH to Checking	\$97.47
		<b>TOTAL</b>	<b>\$157.47</b>

15. Respondents reported the following contributions totaling \$400 which were not found in their official fund depository:

<b>Date</b>	<b>Contributor</b>	<b>Amount</b>
11-13-11	James Thomas	\$100.00
11-13-11	Brenda Romey	\$100.00
01-20-12	Sean Fitzgerald	\$100.00
01-27-12	Jennifer Lohman	\$100.00
	<b>TOTAL</b>	<b>\$400.00</b>

## COUNT IV

### *Failure to timely and accurately report expenditures*

16. Respondents failed to report the following nine (9) expenditures, totaling \$1,390.52, on campaign finance disclosure reports:

<b>Expenditure Date</b>	<b>Check Number</b>	<b>Payee</b>	<b>Amount</b>
9/12/11		Return fee for check 2002	\$15.00
9/12/11		Return fee for check 2003	\$15.00
9/15/11		Return fee for check 2008	\$15.00
9/16/11		Return fee for check 2005	\$15.00
9/23/11		Overdraft fee	\$30.00
10/3/11	2014	A&W Services	\$235.00
11/15/11	2027	Creative Litho	\$160.00
11/14/11	2029	EFT Sam's Club Purchase	\$155.52
no date	2081	Missouri Democratic State Committee	\$750.00
		<b>TOTAL</b>	<b>\$1,390.52</b>

17. Respondents reported the following eight (8) expenditures totaling \$875.64 which were not found in their official fund depository:

<b>Date</b>	<b>Expenditure – Vendor – Recipient</b>	<b>Amount</b>
09-03-11	Niche Printing & Communications	\$29.91
11-11-11	Deals	\$20.05
11-12-11	Dollar Tree	\$7.55
11-14-11	Sun Retail	\$42.80
06-13-12	Daniel McFarland – consulting	\$160.00
06-14-12	Creative Litho	\$151.89
06-14-12	O.R. Pechman - printing	\$363.44
06-15-12	Pride St. Louis	\$100.00
	<b>TOTAL</b>	<b>\$875.64</b>

## COUNT V

### *Cash Withdrawals*

18. Respondents made two cash withdrawals from their official fund depository, one for \$500 on March 5, 2012 and one for \$375 on April 3, 2012.

## COUNT VI

### *Consulting Services*

19. Respondents used the term “consultant” on two separate campaign finance reports to describe the purposes of the following sixteen (16) expenditures totaling \$6,240.35 as follows:

Report	Date	Recipient	Description	Amount
April 2012	3/27/2012	Harold Brown	Consultant	\$785.00
April 2012	3/27/2012	Harold Brown	Consultant	\$785.00
April 2012	3/12/2012	Harold Brown	Consultant	\$300.00
July 2012	4/1/2012	Harold Brown	Consultant	\$500.00
July 2012	4/1/2012	Darryl James	Consulting	\$300.00
July 2012	4/2/2012	Adrienne Hughes	Consulting	\$100.00
July 2012	5/4/2012	Michael Person	Consulting	\$160.00
July 2012	5/19/2012	Michael Person	Consulting	\$82.32
July 2012	5/24/2012	Zachery Keys	Consulting	\$175.00
July 2012	5/26/2012	Zachery Keys	Consulting	\$100.00
July 2012	5/31/2012	Adrienne Hughes	Consulting	\$250.00
July 2012	6/13/2012	Daniel McFarland	Consulting	\$160.00
July 2012	6/22/2012	Zachery Keys	Consulting	\$220.00
July 2012	6/25/2012	Zachery Keys	Consulting	\$173.03
July 2012	6/28/2012	Adrienne Hughes	Consulting	\$2,000.00
July 2012	6/28/2012	Zachery Keys	Consulting	\$150.00
			<b>TOTAL</b>	<b>\$6,240.35</b>

## COUNT VII

### *Failure to Maintain Committee Records*

20. Respondents failed to maintain receipts/invoices for the following fifty-four transactions, totaling \$11,218.37:

Bank Statement	Date	Check #	Payee	Amount
10/1/11-10-31-11	9/29/2011	2014	A&W Services	\$235.00
11/1/11-11/30-11	11/15/2011	2027	Creative Litho	\$160.00
11/1/11-11/30-11	11/10/2011	2028	Trader Joe's	\$145.46
11/1/11-11/30-11	11/14/2011	2029	EFT Sam's Club Purchase	\$155.52
11/1/11-11/30-11	11/15/2011	2030	EFT Dollar Tree Purchase	\$51.80
11/1/11-11/30-11	11/21/2011	2034	Street Dreamz	\$500.00
11/1/11-11/30-11	11/21/2011	2036	USPS	\$44.00

<b>Bank Statement</b>	<b>Date</b>	<b>Check #</b>	<b>Payee</b>	<b>Amount</b>
11/1/11-11/30-11	11/21/2011	2032	ADT	\$102.64
11/1/11-11/30-11	11/21/2011	2033	Charter Communications	\$192.41
11/1/11-11/30-11	11/21/2011	2035	Paul Muhammad	\$400.00
12/1/11-12-31-11	12/1/2011	2038	Street Dreamz	\$500.00
12/1/11-12-31-11	12/12/2011	2041	Ameren	\$19.43
12/1/11-12-31-11	12/12/2011	2042	Ameren	\$85.39
12/1/11-12-31-11	12/23/2011	2044	Harold Brown	\$500.00
1/1/12-1/31/12	12/12/2011	2037	Who's Who Publishing	\$50.00
1/1/12-1/31/12	1/9/2012	2046	Peace Printing	\$124.76
1/1/12-1/31/12	1/11/2012	2047	EFT Office Depot Purchase	\$29.28
1/1/12-1/31/12	1/17/2012	2049	Party City	\$5.41
1/1/12-1/31/12	1/24/2012	2052	Ameren UE	\$101.59
1/1/12-1/31/12	1/25/2012	2053	Ameren UE	\$17.47
1/1/12-1/31/12	1/25/2012	2054	USPS	\$38.00
1/1/12-1/31/12	1/11/2012	2048	A&W Services	\$50.00
1/1/12-1/31/12	1/24/2012	2051	Charter Communications	\$193.56
2/1/12-2/29/12	2/1/2012	2055	Paul Muhammad	\$400.00
3/1/12-31/12	3/8/2012	2061	Paul Muhammad	\$80.00
3/1/12-31/12	3/10/2012	2062	Harold Brown	\$300.00
3/1/12-31/12	3/5/2012	2060	Charter	\$194.00
3/1/12-31/12	3/17/2012	2064	Paul Muhammad	\$70.00
3/1/12-31/12	3/27/2012	2071	Harold Brown	\$785.00
3/1/12-31/12	3/30/2012	2072	Harold Brown	\$750.00
3/1/12-31/12	3/27/2012	2066	Ameren UE	\$34.53
3/1/12-31/12	3/27/2012	2073	Ameren UE	\$54.41
4/1/12-4/30/12	4/2/2012	2078	Adrienne Hughes	\$100.00
4/1/12-4/30/12	4/2/2012	2075	Adrienne Hughes	\$155.44
4/1/12-4/30/12	3/30/2012	2074	Darryl James	\$300.00
4/1/12-4/30/12	3/23/2012	2065	Hi-Tec Printing	\$246.45
4/1/12-4/30/12	3/27/2012	2067	Charter Communications	\$194.00
4/1/12-4/30/12	3/27/2012	2068	Kim Love Productions LLC	\$480.00
4/1/12-4/30/12	3/27/2012	2070	Peace Printing	\$135.61
4/1/12-4/30/12	4/2/2012	2076	Hi-Tec Printing	\$450.74
4/1/12-4/30/12	4/2/2012	2077	Hi-Tec Printing	\$525.81
4/1/12-4/30/12	4/13/2012	2080	ADT Security Service	\$120.54
4/1/12-4/30/12	4/25/2012	2082	Adrienne Hughes	\$118.00
5/1/12-5/31/12	5/4/2012	2085	Michael Person	\$160.00
5/1/12-5/31/12	5/4/2012	2084	O.R. Pechman	\$537.03
5/1/12-5/31/12	5/16/2012	2087	Ameren UE	\$50.77
5/1/12-5/31/12	5/16/2012	2088	Ameren UE	\$20.50
5/1/12-5/31/12	5/19/2012	2091	Mike Person	\$82.32
5/1/12-5/31/12	5/24/2012	2093	Zak Keys	\$175.00
5/1/12-5/31/12	5/26/2012	2094	Zak Keys	\$100.00
5/1/12-5/31/12	5/30/2012	2095	Inkose	\$500.00

<b>Bank Statement</b>	<b>Date</b>	<b>Check #</b>	<b>Payee</b>	<b>Amount</b>
6/1/12-6/18/12	6/12/2012	2101	EFT Office Depot Purchase	\$58.15
6/1/12-6/18/12	5/31/2012	2096	Adrienne Hughes	\$250.00
6/1/12-6/18/12	6/7/2012	2099	Zak Keys	\$88.35
				<b>\$11,218.37</b>

**JOINT PROPOSED CONCLUSIONS OF LAW**

**COUNT I**

*Failure to timely file statement of committee organization*

21. A candidate committee is a committee “which shall be formed by a candidate to receive contributions or make expenditures in behalf of the person’s candidacy.” §130.011, RSMo.

22. A candidate required to form a candidate committee “shall file a statement of committee organization with the appropriate officer within twenty days after the person or organization becomes a committee, but no later than the date for filing the first report required pursuant to the provisions of section 130.046.” §130.021.5, RSMo.

23. A candidate for the general assembly is exempt from filing a statement of committee organization only if “neither the aggregate of contributions received nor the aggregate of expenditures made on behalf of such candidate exceeds five hundred dollars and no single contributor, other than the candidate, has contributed more than three hundred twenty-five dollars.” §130.016.1, RSMo.

24. There is probable cause to believe that Respondents violated Section 130.021.5, RSMo, by failing to file a statement of committee organization with the Missouri Ethics Commission within twenty days of becoming a committee, and that Respondents did so knowingly.

## COUNT II

### *Failure to timely file campaign finance disclosure reports and accurately report cash on hand*

25. Respondents were required to file campaign finance disclosure reports 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.

....

§ 130.046.1, RSMo.

26. Respondents were required to accurately report the cash on hand at the beginning and end of each reporting period. §130.041.1(2), 130.041.1(5), RSMo.

27. There is probable cause to believe that Respondents violated Sections 130.046.1 130.041.1(2), and 130.041.1(5), RSMo, by failing to timely file three (3) campaign finance disclosure reports, and by failing to accurately report the cash on hand on at least one report, and that Respondents did so knowingly.

### COUNT III

#### *Failure to timely and accurately report contributions*

28. According to §130.021.4(1), RSMo:  
...All contributions which the committee receives in money, checks and other negotiable instruments shall be deposited in a committee's official fund 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.
29. Respondents were required to file campaign finance disclosure reports that set forth receipts for the period, including the:
- (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;

...

(d) Total dollar value of all in-kind contributions received;

(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;

....

§130.041.1(3), RSMo.

30. There is probable cause to believe that Respondents violated Sections 130.021.4(1), RSMo and 130.041.1(3), RSMo, by failing to disclose \$271 in contributions, by failing to include the employer and/or address of the contributor for three (3) contributions totaling \$157.47, and by reporting four (4) contributions totaling \$400.00 which were not deposited into the official fund depository, and that Respondents did so knowingly.

#### COUNT IV

##### *Failure to timely and accurately report expenditures*

31. According to §130.021.4(1), RSMo:

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

32. Respondents were required to file campaign finance disclosure reports that set forth expenditures for the period, including the:

(a) The total dollar amount of expenditures made by check drawn on the committee's depository;

...

(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. Expenditures of one hundred dollars or less may be grouped and listed by categories of expenditure showing the total dollar amount of expenditures in each category, except that the report shall contain 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;

...

§ 130.041.1(4), RSMo.

33. 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.

34. There is probable cause to believe that Respondents violated Sections 130.021.4(1), 130.031.2, and 130.041.1(4), RSMo, by failing to timely and accurately report nine (9) expenditures totaling \$1,390.52, and by reporting eight (8) expenditures totaling \$875.64 which were not paid from the official fund depository, and that Respondents did so knowingly.

#### **COUNT V**

##### *Cash Withdrawals*

35. Respondents are prohibited from making cash withdrawals that exceed fifty dollars:

...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.

§ 130.031.2, RSMo.

36. There is probable cause to believe that Respondents violated Section 130.031.2, RSMo, by making two cash withdrawals that exceeding fifty dollars each, and that Respondents did so knowingly.

## COUNT VI

### *Consulting Services*

37. Respondents are prohibited from using the term “consultant” on campaign finance reports to describe the purpose of an expenditure without filing an independent contractor form:

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, direction mail production, postage, rent, utilities, phone solicitation or fundraising and the dollar amount prorated for each service.

§ 130.041.4, RSMo.

38. There is probable cause to believe that Respondents violated Section 130.041.4, RSMo, by reporting “consultant” on two campaign finance reports but failing to include independent contractor forms, and that Respondents did so knowingly.

## COUNT VII

### *Failure to Maintain Committee Records*

39. Respondents are required to maintain accurate records of expenditures:

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 and canceled checks and other detailed information necessary to prepare and substantiate any statement or reporting to the filed pursuant to this chapter.

§130.036.1 RSMo.

40. There is probable cause to believe that Respondents violated Section 130.036.1, RSMo, by failing to maintain receipts and/or invoices for fifty-four (54) transactions totaling \$11,218.37, and that Respondents did so knowingly.

## 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 A.
  - 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 \$7,535, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$1,530 of that fee within forty-five days after the date of the 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.
  - c. If either Respondent commits any further violation or violations of the campaign finance laws under Chapter 130, RSMo, within the two year period from the date of this order, then both Respondents 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.

d. Respondents Hudson and Citizens to Elect Redditt Hudson shall be jointly and severally liable for all fees imposed under this order.

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 HUDSON

By: Redditt O. Hudson 9/19/13  
Redditt Hudson Date

PETITIONER MISSOURI ETHICS COMMISSION

By: James Klahr 9/25/13  
~~Stacey Heisler~~ James Klahr Date  
~~Acting~~ Executive Director

RESPONDENT CITIZENS TO ELECT REDDITT HUDSON

By: Redditt O. Hudson 9/19/13  
Redditt Hudson Date  
Candidate

By: Curtis R. Stokes 9/25/13  
Curtis R. Stokes Date  
Attorney for Petitioner

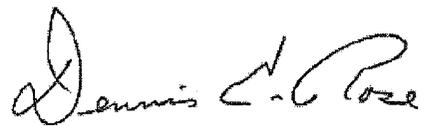


that fee within forty-five (45) days of the date of this Order, the remainder of the fee will be stayed, subject to the provisions below. The fee will be paid by check or money order made payable to the Missouri Ethics Commission and sent to the Missouri Ethics Commission.

3. If either Respondent 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 both Respondents 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 committed such a violation.
4. Respondents Hudson and Citizens to Elect Redditt Hudson shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 1<sup>st</sup> day of October, 2013

By:



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Dennis Rose, Chair  
Missouri Ethics Commission