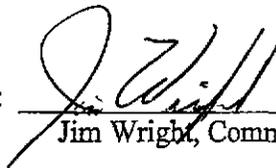


by check or money order made payable to the Missouri Ethics Commission and sent to the Missouri Ethics Commission, and will be due at the time of execution of this Joint Stipulation.

SO ORDERED this 12 day of April, 2010.

By: 
Jim Wright, Commissioner

**BEFORE THE
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION)	
)	
Petitioner,)	
v.)	No. 09E293
)	
BILL SCHUETTE, Candidate)	
)	
and)	
)	
CITIZENS TO ELECT BILL SCHUETTE,)	
Committee,)	
)	
Respondents.)	

**JOINT STIPULATION OF FACTS, WAIVER OF HEARINGS 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, Bill Schuette and Citizens to Elect Bill Schuette, 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 to appear and be represented by counsel; the right to have all charges against Respondents proven upon the record by competent and substantial evidence; the right to cross-examine any witness appearing at the hearing against Respondents; the right to present evidence on Respondents' own behalf at the hearing; and the right to a decision upon the record of

the hearing. Being aware of these rights provided to the Respondents by operation of law, the undersigned Respondents knowingly and voluntarily waives each and every one of these rights and freely enter into this Joint Stipulation of Facts, Waiver of Hearings 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 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. Respondent Bill Schuette is a candidate for Mayor in Wentzville, Missouri in the April 6, 2010 election.
3. Respondent Citizens to Elect Bill Schuette (“Committee”) is a campaign committee in support of Bill Schuette for Mayor of Wentzville, Missouri.
4. Respondents published, circulated and distributed printed matter constituting two newspaper advertisements in support of Respondent Bill Schuette’s candidacy in the following two newspapers:
 - a. Newstime, dated November 7, 2009; and
 - b. Wentzville/Warrenton Journal, dated November 11, 2009.

5. The newspaper advertisements contained the words "Paid for by Citizens to Elect Bill Schuette" on the face of the printed matter, but did not identify the sponsor who paid for the printed matter. The printed matter is incorporated and identified as Exhibit A.

6. Respondent Bill Schuette failed to list his committee's treasurer on two newspaper advertisement publications pursuant to §130.031.8.

7. George Link was at all relevant times the treasurer of the committee, Citizens to Elect Bill Schuette. The name and title of the committee treasurer who was serving when the printed matter was paid for should have followed "Paid for by Citizens to Elect Bill Schuette" as the proper identification of the sponsor.

8. The correct identification for all printed matter was "Paid for by Bill Schuette" George Link, Treasurer.

9. Respondent Committee, Citizens to Elect Bill Schuette, paid for all printed matter with campaign funds.

10. Pursuant to §105.961.1, RSMo, a special investigator has conducted an investigation and reported findings to the Commission.

JOINT CONCLUSIONS OF LAW

1. §130.031.8 RSMo states:

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.

.....

(2) In regard to any printed matter paid for by a committee, it shall be sufficient identification to print the name of the committee as required to be registered by subsection 5 of section 130.021 and the name and title of the committee treasurer who was serving when the printed matter was paid for.

2. There is probable cause to believe that Respondents violated §130.031.8, RSMo by publishing, circulating and distributing printed matter without properly identifying the sponsor who paid for "Paid for by" on the printed matter in support of Respondent Bill Schuette's candidacy for Mayor of Wentzville in the April 6, 2010 election.

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 agree that they will 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 the Respondents Bill Schuette, candidate, and Citizens to Elect Bill Schuette, committee, in the amount of \$100.00 pursuant to §105.961.4(6)

RSMo. The fee will be paid by check or money order made payable to the Missouri Ethics Commission and sent to the Missouri Ethics Commission, and will be due at the time of execution of this Joint Stipulation.

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 attorney 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 and their attorney now have or which they may hereafter have, which is based upon or arises out of the above case.

RESPONDENT

By: Bill Schuette 4-6-10
Bill Schuette Date

PETITIONER

By: Julie A. Allen 4/9/10
Julie A. Allen Date
Executive Director

By: Elizabeth L. Ziegler 4/9/10
Elizabeth L. Ziegler Date
General Counsel
Missouri Ethics Commission
3411-A Knipp Drive
P.O. Box 1370
Jefferson City, MO 65102
Telephone: (573) 751-2020

Attorney for Petitioner