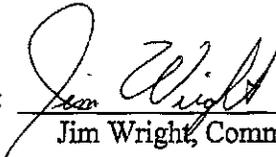




payable to the Missouri Ethics Commission and sent to the Missouri Ethics Commission, at the time of execution of this Joint Stipulation.

SO ORDERED this 31 day of March, 2010.

By:   
Jim Wright, Commissioner

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION	)	
	)	
Petitioner,	)	
v.	)	No. 10E008
	)	
JEFFREY BOYD, Candidate	)	
	)	
Respondent.	)	

**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 Respondent, Jeffrey Boyd, acknowledges that he has 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 Respondent further acknowledges that he is aware of the various rights and privileges afforded by law, including but not limited to: the right to appear and be represented by counsel; the right to have all charges against Respondent proven upon the record by competent and substantial evidence; the right to cross-examine any witness appearing at the hearing against Respondent; the right to present evidence on Respondent's 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 Respondent by operation of law, the undersigned Respondent 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 Respondent 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 Jeffrey Boyd created, produced and distributed approximately 600 mailers in support of Karla R. May for State Representative for the 57<sup>th</sup> District, St. Louis, Missouri, in the February 2, 2010 election.
3. Respondent Jeffrey Boyd paid for all costs associated with the creation, production and distribution of the mailers with personal funds.
4. The mailers in support of Karla R. May, which were distributed to residents of the 22<sup>nd</sup> Ward, contained the words “Paid for by Jeffrey L. Boyd” on the face of the printed matter, but did not include the mailing address in the “paid for by”, a copy of which is marked as Exhibit A and incorporated herein.
5. On January 26, 2010, a complaint was filed with Petitioner alleging campaign finance violations against Respondents.

6. Pursuant to §105.961.1, 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.

.....

(4) In regard to any printed matter paid for by an individual or individuals, it shall be sufficient identification to print the name of the individual or individuals and the respective mailing address . . . .

2. There is probable cause to believe that Respondent violated §130.031.8, RSMo by publishing, circulating and distributing printed matter without including his mailing address in the "Paid for by" on the printed matter in support of Karla R. May's candidacy for State Representative for the 57<sup>th</sup> District in the February 2, 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. Respondent agrees that he will comply with all relevant sections of Chapter 130, RSMo.

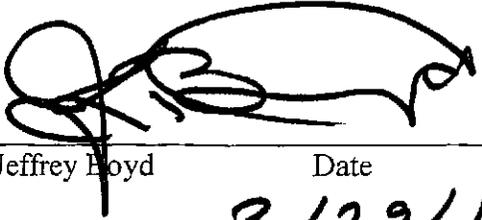
b. It is the order of the Missouri Ethics Commission that a fee is imposed against the Respondent Jeffrey Boyd in the amount of \$100.00 pursuant to §105.961.4(6) RSMo. The fee will be paid by check or money order made payable to the Missouri Ethics Commission and sent to the Missouri Ethics Commission at the time of execution of this Joint Stipulation.

3. The party 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.

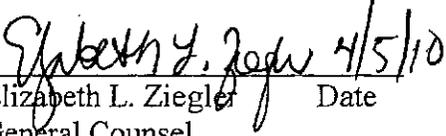
4. Respondent, together with his heirs, successors and assigns, does hereby waive, release, acquit and forever discharge the Missouri Ethics Commission and its attorney of or from any liability, claim, actions, causes of action, fees, costs and expenses, and compensation, including, but not limited to, a claim for attorney's fees whatsoever which Respondent and his attorney now have or which they may hereafter have, which is based upon or arises out of the above case.

RESPONDENT

PETITONER

By:   
Jeffrey Boyd Date  
3/29/10

By:   
Julie A. Allen Date  
Executive Director

By:   
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

Jeffrey L. Boyd  
Alderman, 22nd Ward  
5879 Martin Luther King Dr.  
St. Louis, MO 63112-3712

Vote February 2, 2010



**22ND WARD STANDS WITH KARLA KAY**  
**For State Representative, 57th District**

PRSR STD  
U.S. POSTAGE  
PAID  
ST. LOUIS, MO  
PERMIT NO. 5646

Vote February 2, 2010

22nd Ward Resident  
5917 JULIAN AVE  
St. Louis, MO 63112

Paid for by Jeffrey L. Boyd

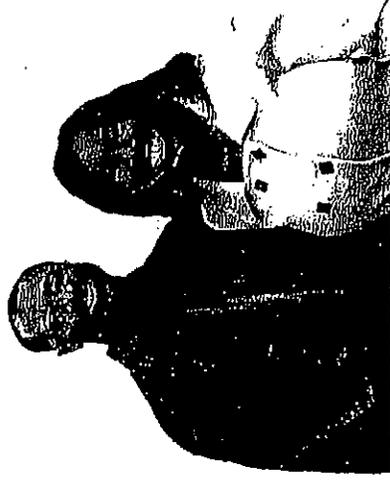
53112332215 0025

PERICAD-Byronne, N. J.  
EXHIBIT  
A

FROM: Jeffrey L. Boyd, Alderman 22nd Ward

Dear 22nd Ward Constituents,

This note is to let you know that I support Karla R. May as our next State Representative. As you may know Talib-din El-Amin resigned in October 2009. Karla has been a champion for community issues for over half of her life. She's a very intelligent young lady with a Masters Degree in Education. Ms. May has been a lifetime resident of the 57th District and the 1st Ward. She regularly attends all community meetings and champions programs that help young people and senior citizens. Karla has spent over 10 years in Jefferson City fighting for better healthcare benefits for all and livable wage jobs for Missouri. This young lady has the experience working with elected officials across the State of Missouri and will hit the ground running as our new State Representative. As I reflect on the type of leadership that would best represent the 22nd Ward in Jefferson City, I am reminded of Karla May. Karla will govern with passion and conviction. This has been demonstrated by her commitment to public service. She is known throughout the 57th District. You may remember when she was a candidate in 2006 to serve as our State Representative; however unsuccessful. This time, we can make it right. There are hundreds of residents that I've spoken with that are committed to Karla. If you haven't committed yet, I need your help in voting for Karla.



**KARLA MAY IS THE PEOPLE'S CHOICE AND THE RIGHT CHOICE**