

**Filed**  
**MAR 14 2012**  
Missouri Ethics  
Commission

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION, )  
 )  
 ) Petitioner, )  
 ) Case No. 11A071  
v. )  
 )  
 )  
CRAIG BLAND, )  
 )  
 )  
Respondent. )

**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 Respondent, Craig Bland, acknowledges that he has received and reviewed a copy of the Complaint filed by the Petitioner in these cases, 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 be 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 behalf at the hearing; and the right to a decision upon the record of the hearing. Being aware of these rights provided to Respondent by operation of law, the undersigned Respondent knowingly and voluntarily waives each and every one of these rights and freely enters 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 agrees 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 Section 105.955, RSMo, in part for the purpose of enforcing the provisions of Chapter 130, RSMo.

2. Respondent Bland is a signatory on the account of the political action committee (“PAC”) Freedom Incorporated.

3. Respondent Bland is not a named treasurer or named deputy treasurer of the PAC Freedom Incorporated, nor was he at any relevant time.

4. Velda Cook is not a named treasurer or named deputy treasurer of the PAC Freedom Incorporated, nor was she at any relevant time.

5. Pursuant to Section 105.961, RSMo, the Commission’s staff has investigated the reports and statements filed with the Commission by Freedom Incorporated and reported the investigation’s 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

*Making expenditures from an official fund depository when not the named treasurer or deputy treasurer (§ 130.021.4, RSMo)*

7. Respondent Bland co-signed with Velda Cook the following 36 checks, totaling \$3,070, out of Freedom Incorporated's official fund depository account on August 3, 2010, and the checks were not co-signed by any named treasurer or deputy treasurer of Freedom Incorporated:

<b>Bank Statement</b>	<b>Date</b>	<b>Item #</b>	<b>Payee</b>	<b>Amount</b>
Aug-10	8/3/2010	3840	Dorothy Belcher	\$80.00
Aug-10	8/3/2010	3852	Kimberly Ross	\$80.00
Aug-10	8/3/2010	3853	Martin Roper	\$80.00
Aug-10	8/3/2010	3854	Maurice N Hall	\$80.00
Aug-10	8/3/2010	3859	Pamela Bowen	\$80.00
Aug-10	8/3/2010	3865	Winerford Hill	\$80.00
Aug-10	8/3/2010	3867	Michael Anthony Childs	\$80.00
Aug-10	8/3/2010	3869	Aaron Lacy	\$80.00
Aug-10	8/3/2010	3871	Eldon Mitchell	\$80.00
Aug-10	8/3/2010	3872	Dennie Shaw Sr	\$80.00
Aug-10	8/3/2010	3874	Erik Stafford	\$100.00
Aug-10	8/3/2010	3875	Tyrell Stafford	\$80.00
Aug-10	8/3/2010	3876	Chad E Clark	\$80.00
Aug-10	8/3/2010	3877	Quincy B Daniels	\$80.00
Aug-10	8/3/2010	3879	Wallace Tindall	\$80.00
Aug-10	8/3/2010	3884	Yvonne Wilson	\$100.00
Aug-10	8/3/2010	3927	Johnny Taylor	\$80.00
Aug-10	8/3/2010	3928	Roderick Harris	\$80.00
Aug-10	8/3/2010	3929	Darin Thomas	\$80.00
Aug-10	8/3/2010	3930	Brenda King	\$100.00
Aug-10	8/3/2010	3931	Ken Brown	\$80.00
Aug-10	8/3/2010	3932	Kevin Todd	\$80.00
Aug-10	8/3/2010	3933	Yolanda Lottie	\$80.00
Aug-10	8/3/2010	3934	Alfred Frazier	\$80.00
Aug-10	8/3/2010	3935	Marvin Kelley	\$100.00

<b>Bank Statement</b>	<b>Date</b>	<b>Item #</b>	<b>Payee</b>	<b>Amount</b>
Aug-10	8/3/2010	3937	Pamela Bland	\$100.00
Aug-10	8/3/2010	3938	Devin Edward	\$80.00
Aug-10	8/3/2010	3939	Orlonda Starks	\$80.00
Aug-10	8/3/2010	3940	Tom Bibbs	\$100.00
Aug-10	8/3/2010	3941	Catherine Harris	\$80.00
Aug-10	8/3/2010	3942	Maurice Tull	\$80.00
Aug-10	8/3/2010	3943	Laquita Brewington	\$80.00
Aug-10	8/3/2010	3944	Rozie Anderson	\$80.00
Aug-10	8/3/2010	3945	Thomas Bibbs Sr	\$80.00
Aug-10	8/3/2010	3946	Ronald Baptiste	\$80.00
Aug-10	8/3/2010	3948	Keith M Thomas	\$150.00
			<b>Total</b>	<b>\$3,070.00</b>

**JOINT CONCLUSIONS OF LAW**

**COUNT I**

*Making expenditures from an official fund depository when not the named treasurer or deputy treasurer (§ 130.021.4, RSMo)*

8. “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....* No expenditure shall be made by a committee when the office of committee treasurer is vacant except that when the office of a candidate committee treasurer is vacant, the candidate shall be the treasurer until the candidate appoints a new treasurer.”

§ 130.021.4, RSMo (emphasis added).

9. “[E]ach 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.” § 130.031.2, RSMo.

10. There is probable cause to believe that Respondent Bland violated Section 130.21.4, RSMo, by making 36 expenditures totaling \$3,070, through the PAC Freedom Incorporated's official depository account, by co-signing checks with Velda Cook, when neither Respondent Bland nor Ms. Cook was a named treasurer or deputy treasurer of the PAC.


## 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 Respondent Bland in the amount of \$3,070.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondent pays \$307.00 of that fee within 45 days after the date of the Order, the remainder of the fee will be stayed for two years, 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 at the time of execution of this Joint Stipulation.
  - c. If Respondent Bland commits any further violations of the campaign finance laws under Chapter 130, RSMo, during the two year stay, then Respondent will be required to pay the remainder of the fee. The fee will be due immediately upon final adjudication finding Respondent Bland has committed such a violation.

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. Respondent, together with his heirs, successor and assigns, does 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 Respondent and Respondent's attorney now have or which they may hereafter have, which are based upon or arise out of the above cases.

  
RESPONDENT CRAIG BLAND

By: Craig Bland \_\_\_\_\_  
Craig Bland Date

PETITIONER

By: Julie A. Allen 3/15/12  
Julie A. Allen Date  
Executive Director

By: Curtis R. Stokes 3/15/12  
Curtis R. Stokes Date  
Staff Attorney  
Missouri Ethics Commission  
3411-A Knipp Drive  
Jefferson City, MO 65109  
Telephone: (573) 751-2020  
Attorney for Petitioner

BEFORE THE  
MISSOURI ETHICS COMMISSION

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 Candidate, )  
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 Respondents. )  
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Case No. 11A071

**CONSENT ORDER**

The parties having filed a Joint Stipulation of Facts, Waiver of Hearing before the Missouri Ethics Commission, and Consent Order with Proposed Findings of Fact and Conclusions of Law (“Joint Stipulation”) with the Missouri Ethics Commission in this matter, the Missouri Ethics Commission hereby accepts as true the facts stipulated and finds that the Respondent Craig Bland violated Section 130.021.4, RSMo, as stated in the Joint Stipulation.

The Commission directs that all terms and orders of the Joint Stipulation be adopted herein and implemented.

- 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 Respondent Bland in the amount of \$3,070.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondent pays \$307.00 of that fee within 45 days after the date of the Order, the remainder of the fee will be stayed for

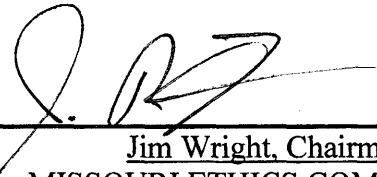


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- c. If Respondent Bland commits any further violations of the campaign finance laws under Chapter 130, RSMo, during the two year stay, then Respondent will be required to pay the remainder of the fee. The fee will be due immediately upon final adjudication finding Respondent Bland has committed such a violation.

SO ORDERED this 14<sup>th</sup> day of March, 2012.

By:



Jim Wright, Chairman  
MISSOURI ETHICS COMMISSION