

BEFORE THE
MISSOURI ETHICS COMMISSION

Filed
JUL 13 2016
Missouri Ethics
Commission

MISSOURI ETHICS COMMISSION,)
)
Petitioner,)
) Case No. 16-0043-I
v.)
)
KEITH MOORE,)
)
Respondent.)

CONSENT ORDER

The parties have filed a Joint Stipulation of Facts, Waiver of Hearing, and Proposed Consent Order with the Missouri Ethics Commission. Accordingly, the Missouri Ethics Commission accepts as true the facts stipulated and finds that Respondent violated Section 130.031.8, RSMo.

The Commission directs that the Joint Stipulation be adopted.

1. Respondent shall comply with all relevant sections of Chapter 130, RSMo.
2. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondent Moore in the amount of \$100 pursuant to Section 105.961.4(6), RSMo. The fee will be paid by check or money order made payable and sent to the Missouri Ethics Commission.

SO ORDERED this 13th day of July, 2016

By:



Nancy Hagan, Chair
Missouri Ethics Commission

Hearing 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 PROPOSED FINDINGS OF FACT

1. The Missouri Ethics 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 Moore is the incumbent Sheriff for Mississippi County, Missouri, running for re-election in the August 2016 primary election.

3. Pursuant to Sections 105.957 and 105.961, RSMo, the Commission's staff investigated a complaint filed with the Commission and reported the investigation findings to the Commission.

4. Based on the investigation report, the Commission determined that there were 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.

5. Using his own personal funds, Respondent Moore personally purchased two newspaper advertisements that ran in two different local newspapers, true and accurate copies of which are attached hereto as Exhibit A and Exhibit B.

6. The newspaper ads referred to in Exhibit A and Exhibit B relate to a candidate in the August 2016 primary election.

7. The newspaper advertisements referred to in Exhibit A and Exhibit B should have contained a clear and conspicuous statement: "Paid for by Keith Moore," but stated instead "Paid for by the candidate."

JOINT PROPOSED CONCLUSIONS OF LAW

8. "Any person publishing, circulating, or distributing any printed matter relative to any candidate for public office []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.

9. "[P]rinted matter' shall be defined to include any ... advertisement, including advertisements in any newspaper or other periodical ...or other imprinted or lettered material." § 130.031.8, RSMo.

10. In regard to any printed matter paid for by a candidate from the candidate's personal funds, it shall be sufficient identification to print the first and last name by which the candidate is known. § 130.031.8(1), RSMo.

11. There is probable cause to believe that Respondent Moore violated Section 130.031.8(1), RSMo, by publishing, circulating and distributing two (2) newspaper ads with an incomplete disclosure, which stated "Paid for by the candidate," rather than the full "Paid for by Keith Moore."

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 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 1.

a. Respondent 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 Respondent Moore in the amount of \$100, pursuant to Section 105.961.4(6), RSMo. The fee will be paid by check or money order made payable and sent to the Missouri Ethics Commission 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. Respondent, together with his heirs, successors, 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 or

Respondent's attorney may now have or which they may hereafter have, which are based upon or arise out of the above cases.

RESPONDENT KEITH MOORE

PETITIONER MISSOURI ETHICS
COMMISSION

By: Keith Moore 7-6-16
Keith Moore Date

By: James Klahr 7/15/16
James Klahr Date
Executive Director

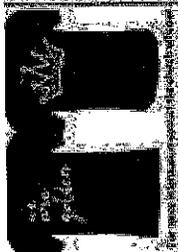
By: Curtis R. Stokes July 15, 2016
Curtis R. Stokes Date
Attorney for Petitioner

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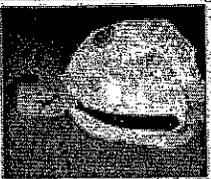
MISSOURI COUNTY
 Missouri County is a beautiful area with a rich history and scenic views. The county is home to many historic sites and landmarks, including the Mark Twain National Forest and the Mark Twain National Monument. The county is also known for its excellent fishing and hunting opportunities. Missouri County is a great place to visit and enjoy the outdoors.

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Sheriff Keith Moore Candidate for Re-Election



Sheriff Keith Moore is running for re-election to his position as Sheriff of Missouri County. He has served the community for many years and is proud of the work he has done. He is committed to providing the highest level of service to the community and is confident that he will continue to do so if re-elected. He is a dedicated public servant and is looking forward to continuing his work for the people of Missouri County.

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EXHIBIT

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