

BEFORE THE
MISSOURI ETHICS COMMISSION

Filed
FEB 06 2017
Missouri Ethics
Commission

MISSOURI ETHICS COMMISSION,)
)
Petitioner,)
)
v.)
)
COALITION 4 PROGRESS,)
)
TERRY RILEY,)
)
and)
)
CHUCK CHIONUMA,)
)

Case No. 16-0002-A

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, Coalition 4 Progress, Terry Riley and Chuck Chionuma, 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 allegations 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 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 Coalition 4 Progress is a continuing committee that supported candidates in the June 2015 Kansas City Municipal Election.
3. Respondent Coalition 4 Progress did not register with the Missouri Ethics Commission until after that election, on July 27, 2015.
4. Respondent Coalition 4 Progress identified Respondent Chionuma as the committee's treasurer through March 21, 2016.
5. Respondent Coalition 4 Progress identified Respondent Riley as the committee's treasurer from March 21, 2016, to present.

6. Pursuant to Sections 105.959 and 105.961, RSMo, the Commission's staff investigated the reports and statements filed with the Commission and reported the investigation findings to the Commission.

7. 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.

COUNT I

Failure to maintain official depository account, make expenditures through committee treasurer or deputy treasurer, timely and accurately file and amend statement of committee organization and statement of committee termination

8. Respondents made expenditures supporting candidates in the June 23, 2015, Kansas City Municipal Election.

9. Respondent Coalition 4 Progress became a committee on May 28, 2015, which was twenty-six (26) days before the municipal election, but Respondents did not file a statement of committee organization with the Missouri Ethics Commission until July 27, 2015, which was thirty-four (34) days after the municipal election and sixty (60) days after Respondents became a committee.

10. Respondents identified Respondent Chionuma as the committee's treasurer on the July 2015 statement of committee organization, and it did not identify Respondent Riley as a treasurer or deputy treasurer.

11. Respondents did not identify Respondent Riley as the committee's treasurer until March 21, 2016, when they filed an amended statement of committee organization with the Commission. Respondents filed this amended statement three (3) weeks after the Commission issued a notice of investigation to Respondents, notifying them that the Commission was conducting an investigation for potential violations of Chapter 130, RSMo.

12. Respondent Riley was a signatory on the committee's official depository account but Respondent Chionuma was not.

13. All committee expenditures, which totaled \$13,798.07, were made by check signed by Respondent Riley before he was identified as the committee's treasurer on Respondents' amended statement of committee organization.

14. Respondents closed the committee's official depository account on November 30, 2015, which was more than three (3) months before Respondents identified Respondent Riley as treasurer.

15. After Respondents closed the committee's account, they did not file an amended statement of committee organization disclosing a new official depository account, nor did they file a statement of committee termination.

16. Since November 2015, Respondents have not maintained an official depository account in the committee's own name.

COUNT II

Cash expenditures in excess of limits

17. Respondents made six (6) cash expenditures, totaling \$500, each of which exceed \$50 each.

COUNT III

Failure to timely and accurately file campaign finance disclosure reports

18. Respondents incorrectly reported the beginning and ending money on hand on Respondents' July 2015 Quarterly and 30 Day After June 2015 Election reports.

19. Respondents failed to file the 8 Day Before June 2015 Election report, the April 2016 Quarterly report, and the July 2016 Quarterly report.

20. Respondents filed statements of limited activity in lieu of full disclosure reports for the October 2015 Quarterly and January 2016 Quarterly reports, but during those reporting periods, Respondents exceeded \$500 in contributions and/or expenditures.

21. Respondents failed to timely file the following disclosure reports:

Report	Due Date	Filed Date	Days Late
July 2015 Quarterly	July 15, 2015	August 9, 2015	25
30 Day After June 2015 Election	July 23, 2015	August 9, 2015	17
October 2015 Quarterly	October 15, 2015	November 7, 2015	23
January 2016 Quarterly	January 1, 2016	January 30, 2016	15

22. Respondents failed to include the correct reporting period on the July 2015 Quarterly report, incorrectly including activity from April 30 through June 12, which should have been included on a 8 Day Before June 2015 Election report, as detailed in paragraph 23.

COUNT IV

Failure to timely and accurately report contributions received

23. As alleged in paragraph 22 above, Respondents failed to timely report the following three (3) monetary contributions received, totaling \$10,810, that were in excess of \$100 each:

Date	Contributor	Amount
8/9/2015	Intl Association of Fire Fighters Local 42	\$5,000
8/9/2015	Committee to Elect Lee Barnes	\$810
8/9/2015	Committee to Elect Lee Barnes	\$5,000
	TOTAL	\$10,810

24. Respondents failed to timely and accurately report the return of a \$108 overdraft charge as a miscellaneous receipt.

25. Respondents Coalition 4 Progress failed to timely and accurately report three (3) in-kind contributions, totaling \$68.83, after Respondent Riley made purchases for the committee using his own money.

26. Respondents reported \$444 in non-itemized contributions that were not reflected in the committee's bank records.

COUNT V

Failure to timely and accurately report expenditures and contributions made

27. Respondents failed to timely and accurately report the following three (3) monetary expenditures, each over \$100, totaling \$1,450:

Recipient	Amount	Bank Statement Date	Report Not Showing Expenditure
Missouri Ethics Commission	\$250.00	8/18/15	October Quarterly 2015
Shelion Durant	\$200.00	9/2/15	
Watkins Funeral Home	\$1,000.00	10/23/15	January Quarterly 2016
TOTAL	\$1,450.00		

28. Respondents reported the following six (6) expenditures, each over \$100, and totaling \$6,523.79, that benefitted other committees, but failed to include them as in-kind contributions made to other committees:

Committee Receiving	Payment Recipient	Amount	Bank Statement Date	Report Not Showing Expenditure
Bacchus for Kansas City	Amrev Development	\$2,106.89	6/15/15	July Quarterly 2015
Committee to Elect Lee Barnes		\$2,106.90	6/15/15	
Bacchus for Kansas City	KPRT Radio	\$405.00	6/18/15	
Committee to Elect Lee Barnes		\$405.00	6/18/15	
Bacchus for Kansas City	Mobile Earth Robo calls	\$750.00	6/22/15	
Committee to Elect Lee Barnes	Mobile Earth Robo calls	\$750.00	6/22/15	
	TOTAL	\$6,523.79		

29. Respondents failed to timely and accurately report the following six (6) expenditures to campaign workers in the list of itemized expenditures, totaling \$500:

Recipient	Purpose	Amount	Report Not Showing Expenditure
Anthony Williams, Jr.	Campaign worker - phone bank	\$75.00	July Quarterly 2015
Maurice Copeland	Field campaign work	\$85.00	
Donald Ousley	Field campaign work	\$85.00	
Frank Flowers	Field campaign work	\$85.00	
Dan Smith	Field campaign work	\$85.00	
Anthony Williams, Jr.	Field campaign work	\$85.00	
	TOTAL	\$500.00	

30. Including the expenditures to campaign workers in paragraph 29 above, Respondents failed to timely and accurately report seventeen (17) expenditures of \$100 or less each by category, totaling \$773.21.

31. Respondents inaccurately reported non-itemized expenditures for gasoline totaling \$165. Specifically, Respondents reported \$270 in expenditures for "gas," but bank records reflected only \$165 in expenditures for gas.

32. Respondents failed to file a Direct Expenditure report disclosing the candidates or ballot measures supported or opposed by the expenditures identified in paragraph 28 above.

33. Respondents reported the purpose of a \$600 expenditures to Riccardo Lucas as "community marketing," and the check to Lucas used the words "campaign consulting" on the memo line, but Respondents failed to file an Independent Contractor form identifying the specific services provided by Lucas.

COUNT VI

Failure to maintain committee records

34. On September 21, 2015, the Ethics Commission requested committee records to be provided no later than October 5, to determine whether Respondents were required to file a 40 Day Before June 2015 Election Report or an 8 Day Before June 2015 Election Report.

35. On October 2, 2015, the Commission received a call from Respondent Chionuma to confirm the records being requested.

36. On October 9, 2015, the Commission received a letter signed by Respondents Chionuma and Respondent Riley (who identified himself as the deputy treasurer), but the letter did not include any committee records.

37. The Commission made three (3) additional requests for records, and on December 4, Respondents provided bank records but no other records such as invoices, receipts, or contributor or fundraiser information.

38. On March 2, 2016 the Commission issued a subpoena for committee records to Respondents.

39. In response to the Commission's subpoena, Respondents did not provide all records that should have been maintained, such as invoices, receipts, checks, contributor information, and other documentation necessary to prepare and substantiate campaign finance reports and statements.

JOINT PROPOSED CONCLUSIONS OF LAW

COUNT I

Failure to maintain official depository account, make expenditures through committee treasurer or deputy treasurer, timely and accurately file and amend statement of committee organization and statement of committee termination

40. A continuing committee "shall be formed no later than sixty days prior to the election for which the committee receives contributions or makes expenditures." § 130.011(10), RSMo.

41. A committee "shall file a statement of 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.

42. A committee "shall have a single official fund depository ... and thereafter maintain at least one official depository account in its own name." § 130.021.4(1), RSMo.

43. A committee must have a treasurer, and it may have a deputy treasurer. § 130.021.1, RSMo.

44. Except for expenditures from a petty cash fund, "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." § 130.031.2, RSMo.

45. A committee shall not accept contributions or make expenditures "except by or through an official depository account and the committee treasurer, deputy treasurer or candidate." § 130.021.4(1), RSMo.

46. Any changes to the committee's official depository account and any changes to the committee's treasurer or deputy treasurer must be reported to the Commission within twenty days on an amended statement of committee organization. § 130.021.7, RSMo.

47. When it terminates, the committee shall file a termination statement “not later than ten days after the date of dissolution with the appropriate officer or officers with whom the committee’s statement of organization was filed.” § 130.021.8, RSMo.

48. For continuing committees, the “appropriate officer” for filing reports and statements is the Missouri Ethics Commission and the election authority for the county in which the committee is domiciled. § 130.026.5(1), RSMo.¹

49. There is probable cause to believe that Respondents violated Sections 130.011(10), 130.021.4(1), 130.021.5, 130.021.7, 130.021.8, and 130.031.2, RSMo, by failing to timely file a statement of committee organization, by failing to timely amend the committee’s statement of committee organization identifying the new treasurer and closure of the committee’s official depository account, by failing to make expenditures through check signed by the committee’s treasurer, and by failing to maintain an official depository account in the committee’s name or terminate the committee upon closure of the official depository account, and that Respondents did so knowingly.

COUNT II

Cash expenditures in excess of limits

50. For purposes of Chapter 130, RSMo, “cash” means “currency, coin, United States postage stamps, or any negotiable instrument which can be transferred from one person to another person without the signature or endorsement of the transferor.” § 130.011(4), RSMo.

51. “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-

¹ Unless otherwise noted, statutes citations are to the Revised Statutes of Missouri in effect as of 2015.

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.

52. “A single expenditure from a petty cash fund shall not exceed fifty dollars.” § 130.031.2, RSMo.

53. “A check made payable to ‘cash’ shall not be made except to replenish a petty cash fund.” § 130.031.2, RSMo.

54. There is probable cause to believe that Respondents violated Section 130.031.2, RSMo, by making cash expenditures totaling \$500 that were each in excess of \$50, and that Respondents did so knowingly.

COUNT III

Failure to timely and accurately file campaign finance disclosure reports

55. A continuing committee must report on campaign finance disclosure reports the amount of money, including cash on hand at the beginning of each reporting period and the end of each reporting period. § 130.041.1(2)–(5), RSMo.

56. The disclosure reports shall be filed 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.

57. “The reporting dates and periods covered for such quarterly reports shall not be later than the fifteenth day of January, April, July and October for periods closing on the thirty-first day of December, the thirty-first day of March, the thirtieth day of June and the thirtieth day of September.” § 130.046.3, RSMo.

58. A committee may not file a statement of limited activity in lieu of a full disclosure report if it has “received contributions aggregating more than five hundred dollars nor made expenditures aggregating five hundred dollars and has not received contributions aggregating more than three hundred dollars from any single contributor.” § 130.046.5(2), RSMo.

59. There is probable cause to believe that Respondents violated Sections 130.046.1, 130.041.1(2)-(5), 130.046.3, and 130.046.5(2), RSMo, by failing to accurately report money on hand, by failing to file three (3) campaign finance disclosure reports, by improperly filing statements of limited activity in lieu of two (2) full disclosure reports, by failing to timely file four (4) reports, and by failing to include activity from the correct reporting periods, and that Respondents did so knowingly.

COUNT IV

Failure to timely and accurately report contributions received

60. Candidates and candidate committees “shall file a legibly printed or typed disclosure report of receipts and expenditures.” § 130.041.1, RSMo.

61. Each report must include all receipts for the period, including:

(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;

...

(c) Total amount of all monetary contributions received through fund-raising events or activities from participants whose names and addresses were not obtained with such contributions, with an attached statement or copy of the statement describing each fund-raising event as required in subsection 6 of section 130.031;

(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.

62. Each report shall set forth a “separate listing by full name and address of any committee, including a candidate committee controlled by the same candidate from which a transfer of funds or a contribution in any amount has been received during the reporting period, together with the date and amount of each such transfer or contribution.” § 130.041.1(9), RSMo.

63. There is probable cause to believe that Respondents violated Sections 130.041.1, 130.041.1(3), 130.041.1(9), and 130.021.4(1), RSMo, by failing to timely and accurately report three (3) monetary contributions received totaling \$10,810, by failing to timely and accurately report a \$108 miscellaneous receipt, by failing to timely and accurately report three (3) in-kind contributions received totaling \$68.83, and by reporting \$444 in non-itemized contributions that were not reflected in the committee’s bank records, and that Respondents did so knowingly.

COUNT V

Failure to timely and accurately report expenditures and contributions made

64. Candidates and candidate committees “shall file a legibly printed or typed disclosure report of receipts and expenditures.” § 130.041.1, RSMo.

65. “The reports shall be filed with the appropriate officer designated in section 130.026 at the times and for the periods prescribed in section 130.046.” § 130.041.1, RSMo.

66. Each report must include all expenditures for the period, including:

(c) The total dollar value of all in-kind expenditures made;

(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.

67. Committees are required to report “the amount of expenditures for or against a candidate or ballot measure during the period covered and the cumulative amount of expenditures for or against that candidate or ballot measure, with each candidate being listed by name, mailing address and office sought.” § 130.041.1(7), RSMo.

68. “The words ‘consulting, 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.” § 130.041.4, RSMo.

69. There is probable cause to believe that Respondents violated Sections 130.041.1, 130.041.1(4), 130.041.1(7), and 130.041.4, RSMo, by failing to timely and accurately report three (3) monetary expenditures, totaling \$1,450, that were over \$100 each, by failing to timely

and accurately report six (6) expenditures totaling \$6,523.79 as in-kind contributions made to other committees, by failing to itemize expenditures totaling \$500 made to campaign workers, by failing to timely and accurately report seventeen (17) expenditures of \$100 or less by category, totaling \$773.21, by inaccurately reporting non-itemized expenditures for gasoline that were not reflected in the committee's bank records, by failing to file a Direct Expenditure report identifying the candidates or ballot measures that were supported or opposed by expenditures totaling \$6,523.79, and by failing to include an independent contractor report disclosing the specific services provided for a \$600 expenditure reported as "community marketing," and that Respondents did so knowingly.

COUNT VI

Failure to maintain committee records

70. The treasurer or deputy treasurer of a committee "shall maintain accurate records and accounts on a current basis." § 130.036.1, RSMo.

71. "The records and accounts shall be maintained in accordance with accepted normal bookkeeping procedures and shall contain the bills, receipts, deposit records, cancelled checks and other detailed information necessary to prepare and substantiate any statement or report required to be filed pursuant to this chapter." § 130.036.1, RSMo.

72. There is probable cause to believe that Respondents violated Section 130.036.1, RSMo, by failing to properly maintain committee records and accounts on a current basis in accordance with accepted normal bookkeeping procedures, 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 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 \$14,450, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$1,895 of that fee within forty-five days after the date of the Order, the remainder of the fee will be stayed. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.

c. It is further ordered that Respondents must file all necessary reports and amendments with the Commission at the time of execution of the consent order.

d. Regardless of the stay in paragraph 2.b above, if any Respondent commits any further violation of the campaign finance laws under Chapter 130, RSMo, within the two-year period from the date of this order, then Respondents will be required to pay the remainder of the fee. The fee will due immediately upon final adjudication finding that any Respondent 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. 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...

SO AGREED:

RESPONDENT COALITION 4 PROGRESS

PETITIONER MISSOURI ETHICS
COMMISSION

By: Terry M. Riley 1-31-17
Coalition 4 Progress Date

By: James Klahr 2/6/17
James Klahr Date
Executive Director

RESPONDENT TERRY RILEY

By: Terry M. Riley 1-31-17
Terry Riley, Treasurer Date

By: Elizabeth L. Ziegler 2/6/17
Elizabeth L. Ziegler Date
Attorney for Petitioner

RESPONDENT CHUCK CHIONUMA

By: Chuck Chionuma 1-31-17
Chuck Chionuma, Former Treasurer Date

By: Ralph Monaco 1-31-17
Ralph Monaco Date
Attorney for Respondent

**BEFORE THE
MISSOURI ETHICS COMMISSION**

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MISSOURI ETHICS COMMISSION,)	
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Petitioner,)	
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v.)	
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COALITION 4 PROGRESS,)	Case No. 16-0002-A
)	
TERRY RILEY,)	
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AND)	
)	
CHUCK CHIONUMA,)	
)	
Respondents.)	

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 Respondents violated Sections 130.011(10), 130.021.4(1), 130.021.5, 130.021.7, 130.021.8, 130.031.2, 130.046.1, 130.041.1(2)-(5), 130.046.3, 130.046.5(2), 130.041.1, 130.041.1(3), 130.041.1(9), 130.041.1(4), 130.041.1(7), 130.041.4 and 130.036.1, RSMo.

The Commission directs that the Joint Stipulation be adopted.

- ~~1. Respondents 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 Respondents in the amount of \$14,450, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$1,895 of that fee within forty-five (45) days after 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.

3. It is further ordered that Respondents must file all necessary reports and amendments with the Commission at the time of execution of the consent order.
4. If any Respondent commits any further violation of the campaign finance laws pursuant to Chapter 130, RSMo, within the two-year period from the date of this order, then Respondents will be required to pay the remainder of the fee. The fee will be due immediately upon final adjudication finding that any Respondent committed such a violation.
5. Respondents shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 6th day of February, 2017

By:



Nancy Hagan, Chair
Missouri Ethics Commission