

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

**Filed**  
**JAN 09 2015**  
Missouri Ethics  
Commission

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	Case No. 12A041
v.	)	
	)	
STEVEN E. WEBB,	)	
Candidate	)	
	)	
and	)	
	)	
FRIENDS OF STEVE WEBB,	)	
Candidate Committee	)	
	)	
Respondents.	)	

**CONSENT ORDER**

The parties have filed a Joint Stipulation of Facts, Waiver of Hearing, and Proposed Consent Order with the Missouri Ethics Commission in this matter. Accordingly, the Missouri Ethics Commission hereby accepts as true the facts stipulated and finds that Respondents Webb and Friends of Steve Webb violated Sections 130.021.4(1), 130.021.7, 130.034, 130.036, 130.021.2, 130.041.1(2), 130.041.1(3), 130.046.3, 130.058, 130.041.1(4), 130.041.1(8), 130.031.1, 30.031.2, 130.046.1, 130.046.5(2), and 130.050.3, RSMo.

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

1. Respondents shall comply with all relevant sections of Chapter 130, RSMo.
2. Respondent Webb acknowledges that he pleaded guilty to, and served his sentence for, seven (7) misdemeanor violations of Missouri's campaign finance laws pursuant to the guilty plea agreement in Case No. 13SL-CR11263-01 in the Circuit Court of Saint Louis County.

3. It is the Order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$100,000, pursuant to Section 105.961.4(6), RSMo. However, if Respondents within sixty (60) days after the date of the Order pay \$1,440 of that fee, pay \$1,500 in late fees as adjudged in case 13AC-AC01616 in the Circuit Court of Cole County, and pay \$60 in late fees due for the late filing of Respondent Webb's 2014 personal financial disclosure statement, and if Respondents within ninety (90) days after the date of the Order file all reports and amendments to correct the reporting errors set forth in the stipulated findings of fact and terminate Respondent Friends of Steve Webb, then the remainder of the \$100,000 fee will be stayed. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.

4. The parties agree that if and only if Respondent Webb fails to comply with the deadlines listed in paragraph 3 above, the Missouri Ethics Commission shall have judgment against Respondents in the full amount of the fee that is still due and owing, and Respondent Webb shall execute together with this joint stipulation an affidavit of confession judgment in such amounts.

5. Respondents Webb and Friends of Steve Webb shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 9<sup>th</sup> day of January, 2015

By:



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Charles E. Weedman, Jr., Chair  
Missouri Ethics Commission

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Candidate )  
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and )  
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FRIENDS OF STEVE WEBB, )  
Candidate Committee )  
)  
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, Webb and Friends of Steve Webb, 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 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 (“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 Webb was a successful candidate for State Representative in the November 4, 2008 General Election, and was re-elected as a state representative in November 2010 and 2012.

3. Respondent Friends of Steve Webb, formerly known as Webb 2008, is and was at all relevant times the candidate committee formed by Respondent Webb to support his candidacy in the 2008 and subsequent elections for the Missouri House of Representatives.

4. Respondent Webb has served as the treasurer of his own candidate committee since it registered with the Commission on April 8, 2008. He never named a deputy treasurer for his candidate committee.

5. On March 29, 2012, Respondent Webb attested that as a candidate he was “responsible to maintain accurate records and accounts” for his candidate committee, that he had received a subpoena *duces tecum* for his committee records, and that he had “no committee records in [his] possession which have not been provided to the Missouri Ethics Commission.”

#### **Official Fund Depository Accounts**

6. On April 8, 2008, Respondents filed a Statement of Committee Organization for “Webb 2008” and reported an official fund depository account in the name of Webb 2008 at Superior Bank, account number \*0528. Account number \*0528 was a savings account opened in the name of “Steven E. Webb d/b/a SW Portrait Group” on January 5, 2007, and closed on December 17, 2010. Respondents did not directly deposit any contributions to this account or make any campaign expenditures from this account, but Respondents did transfer \$325 from account \*1195 (a campaign savings account) to this account between August and October 2010.

7. On October 15, 2009, Respondents filed an amended Statement of Committee Organization in the name of “Friends of Steve Webb” and reported an official fund depository account at Superior Bank, account number \*0833. Account number \*0833 was a savings account opened in the name “Webb 08” on July 3, 2008, and closed on October 22, 2009. Respondent Webb was the sole signatory for account number \*0833.

8. On April 22, 2011, Respondents filed an amended Statement of Committee Organization in the name of “Friends of Steve Webb” and reported an official fund depository account at Superior Bank, account number \*1195. Account number \*1195 was a savings account opened in the name “Friends of Steven E Webb” on October 22, 2009, and closed on December 30, 2011. Respondent Webb was the sole signatory for account number \*1195.

9. On April 4, 2012, Respondents filed an amended Statement of Committee Organization in the name of “Friends of Steve Webb” and reported an official fund depository account at Regions Bank, account number \*0209. Account number \*0209 was a checking account opened in the name “Friends of Steven Webb” on December 30, 2011.

10. Respondents utilized the following accounts to deposit, expend, and transfer campaign contributions and committee funds:

<b>Account</b>	<b>Type</b>	<b>Account Name</b>	<b>Signatory(s)</b>	<b>Dates in use</b>
Regions *0209	Checking	Friends of Steve Webb	Steven E Webb	12/2011--current
Regions *7027	Checking	Steven Webb	Steven E Webb	9/2011 - current
Regions *0195	Checking	Steven & Shalonda Webb	Steven E & Shalonda D Webb	12/2011 - current
Regions *0719	Savings	Steven & Shalonda Webb	Steven E & Shalonda D Webb	12/2011 - 2/2012
Regions *7400	Non-profit	Missouri Black Caucus	Steven E Webb	9/2011 - 3/2012
Superior *1195	Savings	Friends of Steven Webb	Steve Webb	10/2009 - 12/2011
Superior *0833	Savings	Webb '08	Steven E Webb	7/2008 - 10/2009
Superior *3174	Checking	Steven E Webb	Steven E Webb	12/2010-1/2012
Superior *0528	Savings	Steven E Webb d/b/a SW Portrait Group	Steven E & Shalonda D Webb	1/2007 - 12/2010
Superior *2645	Checking	St Louis Spartans Basketball International Fund	Steven E Webb & Terry J Johnson	11/2010 - 12/2011
Superior *1161	Savings	St Louis Spartans Basketball Club	Steven E Webb	2/2010 - 10/2011

<b>Account</b>	<b>Type</b>	<b>Account Name</b>	<b>Signatory(s)</b>	<b>Dates in use</b>
Superior *2660	Checking	St Louis Spartans Basketball 6th/7th Grade Girls	Steven E Webb & Terry J Johnson	11/2010 - 12/2011

11. Pursuant to Section 105.959, RSMo, the Commission’s staff has investigated the reports and statements filed with the Commission and reported the investigation’s findings to the Commission.

12. Based on the report of the Commission’s staff, 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**

*Official fund depository accounts*

13. The Statement of Committee Organization filed on April 8, 2008, for “Webb 2008” reported account number \*0528 at Superior Bank in the name of Webb 2008. The reported account was actually a savings account opened in the name of “Steven E. Webb d/b/a SW Portrait Group” on January 5, 2007.

14. The Amended Statements of Committee Organization filed with the Commission on October 15, 2009 and April 22, 2011 listed accounts \*0833 and \*1195, which were savings accounts and not negotiable draft or negotiable order of withdrawal accounts. Respondent therefore failed to utilize an official depository account complying with §130.021.4(1), RSMo, until December 2011, and Respondents did not report this account to the Commission as their official depository account until April 2012.

15. As detailed in paragraph 10 of this joint stipulation, Respondents used twelve accounts for the deposit, expenditure, and transfer of committee funds, including those contributions that were given to the St. Louis Spartans, as stated in further detail in paragraph 22 below. Six of these accounts were not negotiable draft or negotiable order of withdrawal accounts.

16. Respondents failed to timely report changes made to the following accounts:

Account Number	Bank Account Name	Account Opened	Account Reported	Account Closed
*0833	Webb '08	7/3/2008	10/15/2009	10/22/2009
*1195	Steven E Webb (Friends of)	10/22/2009	4/22/2011	12/30/2011
*0209	Steven E Webb, Friends of Steven Webb	12/30/2011	4/4/2012	still open

## COUNT II

### *Commingling of committee and non-committee funds*

17. Respondents deposited a contribution in the amount of \$250.00 made payable to "Citizens for Hoskins" on August 3, 2012, from the Missouri American Water Company Employees PAC into Account number \*0209, which was opened in December 2011 and reported as the official fund depository in April 2012. Respondent Webb endorsed the check. Neither Citizens for Hoskins nor the Missouri American Water Company Employees PAC authorized Respondents to deposit this check, and Respondents never transmitted the funds to Citizens for Hoskins.

### COUNT III

#### *Unauthorized use of committee funds*

18. Respondent Webb failed to use at least \$11,000 in committee contributions for any allowable purpose, and/or failed to maintain committee records to show the allowable use of committee funds. Respondent Webb failed to use committee funds for any allowable/documented purpose by:

- a. Transferring more than \$4,700 in candidate committee funds to accounts owned and/or operated by Respondent Webb, from which unauthorized purchases were subsequently made.
- b. Withdrawing more than \$2,000 in cash from candidate committee funds to purchase cashier's checks, with which unauthorized purchases were made.
- c. Withdrawing more than \$3,700 in cash from candidate committee funds with no documentation of where or how those withdrawals were spent.

### COUNT IV

#### *Failure to timely and accurately report contributions*

19. Respondent Webb served as the treasurer of his candidate committee and was the sole signatory on all official depository accounts.

20. Respondents failed to file accurate, cumulative campaign finance reports with accurate money on hand by failing to timely report the following contributions, which were deposited into Respondents' official fund depository accounts:

Item Date	Posted Date	Acct. No.	Contributor or source of transfer	Deposit Amount	Required Report
11/05/08	11/10/08	0833	Money order made out to MO Legislative Black Caucus	\$100.00	30 Day After 2008 General
12/08/08	12/08/08	0833	Cash Deposit	\$7.00	October 2009 Quarterly
01/16/09	01/16/09	0833	Savings Deposit--money came from account *0874	\$3.00	October 2009 Quarterly
02/13/09	02/13/09	0833	Savings Deposit	\$2.40	October 2009 Quarterly
02/06/09	04/10/09	0833	Rural Telecommunications Committee PAC PO Box 1865 Jefferson City, MO 65102	\$300.00	October 2009 Quarterly
07/17/09	07/17/09	0833	Cash Deposit	\$25.00	October 2009 Quarterly
07/27/09	07/30/09	0833	Safer Families for Missouri PO Box 1792 Jefferson City, MO 65102	\$325.00	October 2009 Quarterly
07/15/09	08/07/09	0833	Missouri Pharmacy PAC PO Box 1145 Jefferson City, MO 65102	\$200.00	October 2009 Quarterly
04/21/09	08/07/09	0833	Missouri Dental PAC 3340 American Ave Jefferson City, MO 65109	\$200.00	October 2009 Quarterly
07/24/09	09/23/09	0833	AGC of St Louis PAC 6330 Knox Industrial Dr. St Louis, MO 63139	\$325.00	October 2009 Quarterly
09/02/09	10/21/09	0833	Life Sciences of the Greater KC Chamber of Commerce PAC 911 Main St, Ste. 2600 Kansas City, MO 64105	\$500.00	January 2010 Quarterly
09/23/09	01/15/10	1195	Altria Client Services Inc. 5601 West Broad Street Richmond VA 23230	\$500.00	April 2010 Quarterly
04/15/10	04/15/10	1195	Transfer from account *0528	\$25.00	July 2010 Quarterly
07/01/10	07/14/10	1195	Mary Macmillan Buenger 1875 Bobbinray Ave Florissant, MO 63031	\$50.00	8 Day Before 2010 Primary

Item Date	Posted Date	Acct. No.	Contributor or source of transfer	Deposit Amount	Required Report
07/04/10	07/15/10	1195	Lorenzo Winston 3809 Woodmoor Gardens Ct Florissant, MO 63034	\$250.00	8 Day Before 2010 Primary
07/12/10	07/15/10	1195	SEIU Missouri State Council PAC 5585 Pershing Ste. 170 St Louis, MO 63139	\$325.00	8 Day Before 2010 Primary
07/13/10	07/15/10	1195	Express Scripts Inc. One Express Way St Louis, MO 63121	\$500.00	8 Day Before 2010 Primary
07/09/10	07/15/10	1195	Sonnenschein One Metropolitan Square, Ste. 3000 St Louis, MO 63102	\$500.00	8 Day Before 2010 Primary
06/30/10	07/16/10	1195	Erica Scott 16309 hamden Pl Florissant, MO 63034	\$150.00	8 Day Before 2010 Primary
07/09/10	07/16/10	1195	Ameren UE PAC PO Box 780 Jefferson City, MO 65102	\$325.00	8 Day Before 2010 Primary
07/21/10	07/22/10	1195	Treasurer of the State of Missouri Jefferson City, MO	\$12.87	8 Day Before 2010 Primary
07/27/10	07/28/10	1195	Ronald R Torrey Jr, DBA R- Squared Contractor	\$25.00	8 Day Before 2010 Primary
	07/30/10	1195	Cash	\$300.00	8 Day Before 2010 Primary
07/27/10	08/02/10	1195	UP Railroad Company	\$300.00	8 Day Before 2010 Primary
07/23/10	08/02/10	1195	CWA District 6 Political Education Committee 10733 Sunset Office Dr, Ste. 201 St Louis, MO 63127	\$300.00	8 Day Before 2010 Primary
07/28/10	09/07/10	1195	Eastern MO Laborer's Educational & Benevolent Fund 3450 Hollenberg Dr. Bridgeton, MO 63044	\$300.00	October 2010 Quarterly
09/08/10	09/10/10	1195	MO Rental Dealers Association PAC PO Box 1708 Jefferson City, MO 65102	\$300.00	October 2010 Quarterly

Item Date	Posted Date	Acct. No.	Contributor or source of transfer	Deposit Amount	Required Report
09/13/10	09/24/10	1195	Safer Families for Missouri PO Box 1792 Jefferson City, MO 65102	\$325.00	October 2010 Quarterly
10/08/10	10/12/10	1195	Money Order Payable to Committee to Elect Chris Carter endorsed by Webb w/ comment of "not used for purpose intended"	\$200.00	8 Day Before 2010 General
10/25/10	10/26/10	1195	James H McNeil or Margo G McNeil 124 St Stanislaus Florissant, MO 63031	\$100.00	8 Day Before 2010 General
09/17/10	10/26/10	1195	USPSPAC-Missouri, Chmn., Teri P McClure, Treas., Vicky De Los Santos 13818 Rider Trail Drive Earth City, MO 63045	\$350.00	8 Day Before 2010 General
10/21/10	11/01/10	1195	Pfizer Inc New York NY 10017	\$500.00	8 Day Before 2010 General
09/28/10	11/01/10	1195	Pinnacle Entertainment 8918 Spanish Ridge Ave Las Vegas, NV 89148	\$500.00	8 Day Before 2010 General
12/20/10	12/23/10	1195	Laclede Political Action Committee 720 Olive St, Ste. 1524 St Louis, MO 63101	\$250.00	April 2011 Quarterly
12/20/10	12/30/10	1195	Ameren UE PAC PO Box 780 Jefferson City, MO 65102	\$350.00	April 2011 Quarterly
12/28/10	12/31/10	1195	North County Firefighters PAC 16545 Centerpointe Dr. Wildwood, MO 63040	\$500.00	April 2011 Quarterly
12/30/10	12/31/10	1195	Leo V Peoples or Linda R Peoples 1148 English Saddle Rd Florissant, MO 63034	\$50.00	April 2011 Quarterly
12/30/10	12/31/10	1195	Michael C Brock II 1103 Kingston Xing O'Fallon, MO 63366	\$100.00	April 2011 Quarterly
12/30/10	12/31/10	1195	Leroy Grant Jr 4261-63 McPierson St Louis, MO 63108	\$100.00	April 2011 Quarterly

<b>Item Date</b>	<b>Posted Date</b>	<b>Acct. No.</b>	<b>Contributor or source of transfer</b>	<b>Deposit Amount</b>	<b>Required Report</b>
12/28/10	12/31/10	1195	Metro North Fire Fighters Fund 1815 Chambers St Louis, MO 63136	\$100.00	April 2011 Quarterly
12/30/10	12/31/10	1195	Committee to Elect Rev Tommie L Pierson, Sr. 1269 Shepley St Louis, MO 63137	\$100.00	April 2011 Quarterly
12/30/10	12/31/10	1195	Riverview Firefighters Fund 1 Filly court Florissant, MO 63033	\$100.00	April 2011 Quarterly
12/28/10	12/31/10	1195	Friends to Elect Sylvester Taylor 115 McMenamy St Peters, MO 63376	\$200.00	April 2011 Quarterly
12/29/10	12/31/10	1195	Spanish Lake Firefighters Community Service Fund 11 Quackers Place O'Fallon, MO 63366	\$325.00	April 2011 Quarterly
12/28/10	12/31/10	1195	Professional Firefighters of Eastern MO Local 2665 PAC Fund 115 McMenamy St Peters, MO 63376	\$325.00	April 2011 Quarterly
12/30/10	12/31/10	1195	Leo V Peoples or Linda R Peoples 1148 English Saddle Rd Florissant, MO 63034	\$50.00	April 2011 Quarterly
12/30/10	12/31/10	1195	Citizens for Tishaura O Jones 2017 S Grand Blvd, No 105 St Louis, MO 63104	\$250.00	April 2011 Quarterly
12/23/10	12/31/10	1195	Central St Louis Co Fire Fighters PAC, Kurt Becker-Chairman, Jennifer Stihlman-Treasurer, Robert Carver-Deputy Treasurer 115 McMenamy Rd St Peters, MO 63376	\$250.00	April 2011 Quarterly
12/30/10	12/31/10	1195	Black Jack Union Firefighters Fund 5475 North Highway 67 Florissant, MO 63034	\$200.00	April 2011 Quarterly

Item Date	Posted Date	Acct. No.	Contributor or source of transfer	Deposit Amount	Required Report
12/29/10	12/31/10	1195	Florissant Professional Firefighters 601 St Ferdinand St Florissant, MO 63031	\$200.00	April 2011 Quarterly
12/30/10	01/24/11	1195	Herbert H Hoosman Jr 7274 Winchester Dr. St Louis, MO 63121	\$250.00	April 2011 Quarterly
02/28/11	03/11/11	1195	Clay Jr for Congress PO Box 4544 St Louis, MO 63108	\$500.00	April 2011 Quarterly
07/15/11	07/15/11	1195	Transfer from account *3174	\$4.00	October 2011 Quarterly
08/12/11	08/12/11	1195	Transfer from account *1161	\$495.00	October 2011 Quarterly
09/21/11	10/11/11	1195	Life Sciences Fund of Greater KC PO Box 1865 Jefferson City, MO 65102	\$250.00	January 2012 Quarterly
09/23/11	10/11/11	1195	Supporters of Health Research & Treatments PO Box 11591 St Louis, MO 63105	\$250.00	January 2012 Quarterly
10/17/11	10/26/11	1195	Sloehringer Ingelheim USA Corporation PO Box 1098 Edgefield, CT	\$250.00	January 2012 Quarterly
11/02/11	11/08/11	1195	MO Dental PAC 3340 American Ave Jefferson City, MO 65109	\$500.00	January 2012 Quarterly
10/17/11	11/14/11	1195	PT-PAC of Missouri	\$300.00	January 2012 Quarterly
11/11/11	11/21/11	1195	Motor Carrier Public Affairs Committee PO Box 89 Eldon, MO 65026	\$300.00	January 2012 Quarterly
11/11/11	11/21/11	1195	Cashier's Check on Regions payable to The Committee to re-elect Steve Webb, purchaser Joe W(the rest of last name unreadable)	\$500.00	January 2012 Quarterly
09/23/11	11/21/11	1195	USPSPAC-Missouri 13818 Rider Trail Drive Earth City, MO 63045	\$350.00	January 2012 Quarterly

Item Date	Posted Date	Acct. No.	Contributor or source of transfer	Deposit Amount	Required Report
12/29/11	12/30/11	0209	Professional Fire Fighters Firefighters of Eastern Missouri Local 2665/PAC Fund 115 McMenamy St Peters, MO 63376	\$300.00	April 2012 Quarterly
12/29/11	12/30/11	0209	North County Firefighters PAC 16545 Centerpointe Dr. Wildwood, MO 63040	\$300.00	April 2012 Quarterly
11/29/11	01/04/12	0209	Sallie Mae, Default Accounting Department PO Box 9196 Indianapolis, IN 48208	\$10.92	April 2012 Quarterly
12/27/11	01/04/12	0209	Sallie Mae, Default Accounting Department PO Box 9196 Indianapolis, IN 48208	\$136.68	April 2012 Quarterly
12/20/11	01/04/12	0209	The Empire District Electric Co, Political Action Committee PO Box 127 Joplin, MO 64802	\$250.00	April 2012 Quarterly
	01/20/12	0209	EB from account *0195	\$35.00	April 2012 Quarterly
11/01/11	02/14/12	0209	Sprint Nextel PO Box 63670 Phoenix, AZ	\$250.00	April 2012 Quarterly
	02/16/12	0209	EB from account *0719	\$600.00	April 2012 Quarterly
	02/21/12	0209	EB from account *0719	\$200.00	April 2012 Quarterly
	04/19/12	0209	EB from account *0195	\$25.00	July 2012 Quarterly
05/11/12	05/22/12	0209	Cashier's Check - PNC Bank Remitter Kenya Haney	\$1,000.00	July 2012 Quarterly
	06/07/12	0209	EB from account *0195	\$60.00	July 2012 Quarterly
	07/16/12	0209	Cash Deposit	\$576.00	8 Day Before 2012 Primary
07/17/12	07/27/12	0209	Rural Telecommunications Committee PAC PO Box 1865 Jefferson City, MO 65102	\$350.00	8 Day Before 2012 Primary
07/19/12	07/27/12	0209	Ameristar Casinos KC PO Box 33480 Kansas City, MO 64126	\$250.00	8 Day Before 2012 Primary

Item Date	Posted Date	Acct. No.	Contributor or source of transfer	Deposit Amount	Required Report
07/16/12	07/27/12	0209	Ameristar Casinos St Charles One Ameristar Blvd. St Charles, MO 63301	\$250.00	8 Day Before 2012 Primary
06/29/12	07/27/12	0209	Missouri Pharmacy PAC PO Box 1140 Jefferson City, MO 65102	\$200.00	8 Day Before 2012 Primary
06/29/12	07/27/12	0209	Dooley for St Louis County	\$250.00	8 Day Before 2012 Primary
06/29/12	07/27/12	0209	Missouri NEA-PAC 1810 E Elm St. Jefferson City, MO 65101	\$200.00	8 Day Before 2012 Primary
07/17/12	07/27/12	0209	MO BEV PAC PO Box 1066 Jefferson City, MO 65102	\$350.00	8 Day Before 2012 Primary
07/20/12	07/27/12	0209	SEIU Missouri State Council PAC 5685 Pershing Ste. 170 St Louis, MO 63139	\$500.00	8 Day Before 2012 Primary
07/29/12	07/30/12	0209	Clay Jr for Congress PO Box 4544 St Louis, MO 63106	\$1,500.00	8 Day Before 2012 Primary
08/01/12	08/01/12	0209	Committee to Elect Tommie L Pierson, Sr. 16545 Centerpointe Dr. Wildwood, MO 63040	\$2,000.00	8 Day Before 2012 Primary
07/25/12	08/03/12	0209	Major Brands Inc PAC 6701 Southwest Ave. S Louis, MO 63143	\$500.00	8 Day Before 2012 Primary
07/30/12	08/03/12	0209	PT-PAC of Missouri	\$500.00	8 Day Before 2012 Primary
07/13/12	08/03/12	0209	Missouri American Water Employees PAC 727 Craig Rd. St Louis, MO 63141	\$250.00	8 Day Before 2012 Primary
07/13/12	08/03/12	0209	Missouri American Water Employees PAC 727 Craig Rd. St Louis, MO 63141	\$250.00	8 Day Before 2012 Primary
08/17/12	09/07/12	0209	Altria Client Services Inc. Richmond VA 23280	\$350.00	October 2012 Quarterly
07/25/12	09/07/12	0209	Burns & McDonnell	\$500.00	October 2012 Quarterly

Item Date	Posted Date	Acct. No.	Contributor or source of transfer	Deposit Amount	Required Report
08/09/12	09/14/12	0209	Penn National Gaming, Inc 825 Berkshire Blvd., Wyoming Professional Center Wyoming, PA 19810	\$100.00	October 2012 Quarterly
09/10/12	09/14/12	0209	Centene Management Company LLC Centene Corporation St Louis, MO 63105	\$500.00	October 2012 Quarterly
	09/24/12	0209	EB from account *7027	\$4,975.00	October 2012 Quarterly
	09/27/12	0209	EB from account *7027	\$100.00	October 2012 Quarterly
	10/05/12	0209	EB from account *7027	\$20.00	8 Day Before 2012 General
			<b>TOTAL</b>	<b>\$33,162.87</b>	

21. Respondents reported the following contributions, which were not deposited into

Respondents' official depository accounts:

Reported Receipt Date	Contributions Reported Received From	Deposit Amount	Report
03/12/10	Erin Webb 1508 7th Street Port Arthur, TX 77642	\$500.00	April 2010 Quarterly
03/12/10	Erin Webb 1508 7th Street Port Arthur, TX 77642	\$500.00	April 2010 Quarterly
03/13/10	Dianna Ross 520 Pryce Lake Charles, LA 70601	\$500.00	April 2010 Quarterly
03/13/10	Ella Guilbeaux 3612 11th Street Port Arthur, TX 77642	\$200.00	April 2010 Quarterly
06/30/10	Mary MacMillan Euenger 1875 Bobbinray Florissant, MO 63031	\$20.00	July 2010 Quarterly
12/29/11	IAFF Local 73 4271 Delor St Louis, MO 63116	\$300.00	January 2012 Quarterly

Reported Receipt Date	Contributions Reported Received From	Deposit Amount	Report
12/29/11	Metro North 1815 Chambers St Louis, MO 63136	\$300.00	January 2012 Quarterly
	<b>TOTAL</b>	<b>\$2,320.00</b>	

22. Respondents failed to report the following three contributions totaling \$1,325, all to Friends of Steve Webb, also discussed in paragraph 15 above, which were deposited into Account \*1161:

Item Date	Posted Date	Acct. No.	Description	Deposit Amount	Required Report	Notation
05/31/11	06/09/11	1161	Home Building Industry Political Action Committee 10104 Old Olive St Rd St Louis, MO 63141	\$325.00	July 2011 Quarterly	Payable to "Friends of Steve Webb" and is endorsed by Steven Webb
06/09/11	06/20/11	1161	MO Association of Nurse Anesthetists Political Action Committee	\$500.00	July 2011 Quarterly	Payable to "Committee to Elect Steve Webb" and endorsed by Steven Webb
07/29/11	08/12/11	1161	Ameren UE PAC PO Box 780 Jefferson City, MO 65102	\$500.00	October 2011 Quarterly	Payable to "Friends of Steve Webb", memo reads "2012 Primary Election" and is endorsed by Steven Webb

**COUNT V**

*Failure to timely and accurately report expenditures*

23. Respondents failed to file accurate, cumulative campaign finance reports with accurate money on hand by failing to timely report the following forty-four (44) expenditures totaling \$5,864, which were made from their official depository account:

<b>Posted Date</b>	<b>Acct. No.</b>	<b>Description</b>	<b>Check Amount</b>	<b>Required report</b>
07/07/08	0833	Savings Withdrawal - Steven Webb	\$100.00	8 Day Before 2008 Primary
07/15/08	0833	Savings Withdrawal - Steven Webb	\$99.00	8 Day Before 2008 Primary
07/31/08	0833	Savings Withdrawal - Steven Webb	\$465.00	30 Day After 2008 Primary
08/25/08	0833	Savings Withdrawal - Steven Webb	\$200.00	30 Day After 2008 Primary
08/28/08	0833	Savings Withdrawal - Steven Webb	\$50.00	30 Day After 2008 Primary
08/29/08	0833	Service Charge	\$3.00	30 Day After 2008 Primary
10/03/08	0833	Transfer of Funds to Account *0528	\$220.00	8 Day Before 2008 General
10/07/08	0833	Savings Withdrawal - Steven Webb	\$300.00	8 Day Before 2008 General
10/08/08	0833	Savings Withdrawal - Steven Webb	\$50.00	8 Day Before 2008 General
10/09/08	0833	Savings Withdrawal - Steven Webb	\$200.00	8 Day Before 2008 General
10/14/08	0833	Savings Withdrawal - Steven Webb	\$1,300.00	8 Day Before 2008 General
10/21/08	0833	Research Fee Webb '08	\$20.00	8 Day Before 2008 General
10/31/08	0833	Service Charge	\$3.00	30 Day After 2008 General
11/04/08	0833	Savings Withdrawal - Steven Webb	\$250.00	30 Day After 2008 General
11/05/08	0833	Savings Withdrawal - Steven Webb	\$250.00	30 Day After 2008 General
11/07/08	0833	Savings Withdrawal - Steven Webb	\$150.00	30 Day After 2008 General
11/10/08	0833	Savings Withdrawal - Steven Webb	\$300.00	30 Day After 2008 General
11/12/08	0833	Savings Withdrawal - Steven Webb	\$100.00	30 Day After 2008 General
11/14/08	0833	Savings Withdrawal - Steven Webb	\$350.00	30 Day After 2008 General
11/21/08	0833	Savings Withdrawal - Steven Webb	\$40.00	30 Day After 2008 General
11/28/08	0833	Savings Withdrawal - Steven Webb	\$30.00	30 Day After 2008 General
11/28/08	0833	Excess Transaction Fee	\$5.00	30 Day After 2008 General
11/28/08	0833	Service Charge	\$3.00	30 Day After 2008 General
11/28/08	0833	Excess Transaction Fee	\$10.00	30 Day After 2008 General
12/31/08	0833	Service Charge	\$3.00	October 2009 Quarterly
01/30/09	0833	Service Charge	\$3.00	October 2009 Quarterly
04/10/09	0833	Transfer of Funds to account *0528	\$275.00	October 2009 Quarterly
04/30/09	0833	Service Charge	\$3.00	October 2009 Quarterly
05/14/09	0833	Transfer of Funds to account *0874 to close this account named Extended Horizons	\$2.00	October 2009 Quarterly
05/30/09	0833	Service Charge	\$3.00	October 2009 Quarterly
06/09/09	0833	Savings Withdrawal - Steven Webb	\$15.00	October 2009 Quarterly

Posted Date	Acct. No.	Description	Check Amount	Required report
06/30/09	0833	Service Charge	\$3.00	October 2009 Quarterly
07/30/09	0833	Cash Withdrawal from Deposit	\$125.00	October 2009 Quarterly
07/31/09	0833	Service Charge	\$3.00	October 2009 Quarterly
08/04/09	0833	Savings Withdrawal - Steven Webb	\$100.00	October 2009 Quarterly
08/07/09	0833	Cash Withdrawal from Deposit	\$200.00	October 2009 Quarterly
08/19/09	0833	Savings Withdrawal - Steven Webb	\$160.00	October 2009 Quarterly
08/20/09	0833	Savings Withdrawal - Steven Webb	\$60.00	October 2009 Quarterly
08/25/09	0833	Savings Withdrawal - Steven Webb	\$50.00	October 2009 Quarterly
08/31/09	0833	Service Charge	\$3.00	October 2009 Quarterly
09/28/09	0833	Savings Withdrawal - Steven Webb	\$175.00	October 2009 Quarterly
09/29/09	0833	Savings Withdrawal - Steven Webb	\$50.00	October 2009 Quarterly
09/30/09	0833	Service Charge	\$3.00	October 2009 Quarterly
10/21/09	0833	Savings Withdrawal - Steven Webb	\$130.00	January 2010 Quarterly
		<b>TOTAL</b>	<b>\$5,864.00</b>	

24. Respondents failed to file accurate, cumulative campaign finance reports with accurate money on hand by reporting the following expenditures over \$100 each, which were not made from Respondents' official depository accounts:

Payee	Date	Reported Purpose	Amount	Report
Economical mail	7/31/2008		\$1,000.00	30 Day After 2008 Primary
PK Broward	6/24/2008	5000 door hangers	\$420.00	July 2008 Quarterly
CBS Outdoor	7/7/2008	billboard payment	\$500.00	8 Day Before 2008 Primary
CBS Outdoor	7/10/2008	billboard payment	\$250.00	8 Day Before 2008 Primary
PK Broward	7/15/2008	Door hangers	\$350.00	8 Day Before 2008 Primary
PK Broward	7/28/2008	6x9 postcards	\$235.00	8 Day Before 2008 Primary
Marks Quick Printing	10/3/2008	letter heads/envelopes	\$144.95	8 Day Before 2008 Primary
shop and save	11/3/2008	food, water for poll workers	\$277.25	30 Day After 2008 General
Club 314	11/4/2008	election night victory party	\$675.00	30 Day After 2008 General

<b>Payee</b>	<b>Date</b>	<b>Reported Purpose</b>	<b>Amount</b>	<b>Report</b>
Pelican Printing	6/10/2010	campaign literature & letterhead, envelopes	\$1,113.22	July 2010 Quarterly
OR Pechman Signs	6/11/2010	campaign signs	\$963.41	July 2010 Quarterly
CBS Outdoors	6/28/2010	billboard	\$1,500.00	July 2010 Quarterly
AT&T	6/24/2010	phone service	\$265.00	July 2010 Quarterly
Victory DIY	6/15/2010	website	\$109.99	July 2010 Quarterly
Lowes	7/17/2010	metal post for signs	\$117.23	8 Day Before 2010 Primary
OR Pechman Signs	7/22/2010	campaign signs	\$389.61	8 Day Before 2010 Primary
Shop & Save	8/3/2010	Election Day food drinks etc	\$337.21	8 Day Before 2010 Primary
St Louis Spartans Youth Organization	8/18/2010	Sports Uniform Sponsorship	\$1,500.00	8 Day Before 2010 Primary
AT&T	8/11/2010	phone service	\$424.26	8 Day Before 2010 Primary
SBP Image Solutions	9/15/2010	office copier/printer	\$400.00	October 2010 Quarterly
NCYA Seminoles Football Team	10/18/2010	donation	\$250.00	Amended 8 Day Before 2010 General
Jamestown Mall	10/15/2010	office Rent and Electricity	\$915.00	Amended 8 Day Before 2010 General
Post office	7/7/2010	stamps	\$264.00	8 Day Before 2010 Primary
All Mail USA	7/14/2010	mail distribution	\$1,191.31	8 Day Before 2010 Primary
All Mail USA	7/21/2010	mail distribution	\$1,191.31	8 Day Before 2010 Primary
Terrance Washington	7/23/2010	t shirts	\$350.00	8 Day Before 2010 Primary

Payee	Date	Reported Purpose	Amount	Report
All Mail USA	7/27/2010	mailing	\$1,191.31	30 Day After 2010 Primary
All Mail USA	7/29/2010	mailing	\$1,454.38	30 Day After 2010 Primary
Advertisers Printing	7/30/2010	ballot cards	\$580.00	30 Day After 2010 Primary
Advertisers Printing	7/30/2010	campaign literature	\$1,121.17	30 Day After 2010 Primary
Heavenly Fish	8/4/2010	election night food	\$118.77	30 Day After 2010 Primary
Friends of Tishaura Jones	10/9/2015 (yes)	reimbursement for movie preview	\$200.00	Amended 8 Day Before 2010 General
Missouri Ethics Commission	1/4/2011	Late Fees	\$4,590.00	Amended April 2011 Quarterly
Delta Airlines	9/6/2011	Congressional Black Caucus Foundation Conference	\$311.00	October 2011 Quarterly
Phoenix Park Hotel	9/22/2011	congressional black caucus foundation conference	\$769.21	October 2011 Quarterly
Sprint Store	8/16/2011	phone services	\$289.14	October 2011 Quarterly
		<b>TOTAL</b>	<b>\$25,758.73</b>	

25. Respondents failed to file accurate, cumulative campaign finance reports with accurate money on hand by reporting the following expenditures of \$100 or less, which were not made from Respondents' official depository account:

Purpose	Amount Reported	Report
Logo design	\$65.00	April 2010 Quarterly
Stamps	\$88.00	30 Day After 2010 Primary
Lunch meeting	\$47.81	30 Day After 2010 Primary
Gas	\$36.13	30 Day After 2010 Primary
Office Supplies	\$92.67	30 Day After 2010 Primary
Lunch meeting	\$27.81	30 Day After 2010 Primary
Ad	\$100.00	30 Day After 2010 Primary
<b>TOTAL</b>	<b>\$457.42</b>	

26. Respondents failed to report two contributions, dated August 2, 2012 and August 20, 2012, totaling \$500, which Respondents made to Michael Butler for a Better Missouri, a candidate committee.

**COUNT VI**

*Cash contributions and expenditures in excess of limits*

27. Respondents received the two following cash contributions totaling \$876:

Posted Date	Acct. No.	Deposit Amount	Required Report
07/30/10	1195	\$300.00	30 Day After 2010 Primary
07/16/12	0209	\$576.00	8 Day Before 2012 Primary
	<b>TOTAL</b>	<b>\$876.00</b>	

28. Respondents made the following cash expenditures that either exceeded \$50 each or exceeded the annual limit of total cash expenditures:

Date	Acct.	Type of Withdrawal	Amount	Required Report
07/07/08	0833	Savings Withdrawal - Steven Webb	\$100.00	8 Day Before Primary 8/5/08
07/15/08	0833	Savings Withdrawal - Steven Webb	\$99.00	8 Day Before Primary 8/5/08
07/31/08	0833	Savings Withdrawal - Steven Webb	\$465.00	30 Day After Primary 8/5/08
08/25/08	0833	Savings Withdrawal - Steven Webb	\$200.00	30 Day After Primary 8/5/08
08/28/08	0833	Savings Withdrawal - Steven Webb	\$50.00	30 Day After Primary 8/5/08
10/03/08	0833	Transfer of Funds to account *0528 (Steven Webb d/b/a SW Portrait Group)	\$220.00	8 Day Before General 11/4/08

<b>Date</b>	<b>Acct.</b>	<b>Type of Withdrawal</b>	<b>Amount</b>	<b>Required Report</b>
10/07/08	0833	Savings Withdrawal - Steven Webb	\$300.00	8 Day Before General 11/4/08
10/08/08	0833	Savings Withdrawal - Steven Webb	\$50.00	8 Day Before General 11/4/08
10/09/08	0833	Savings Withdrawal - Steven Webb	\$200.00	8 Day Before General 11/4/08
10/14/08	0833	Savings Withdrawal - Steven Webb	\$1,300.00	8 Day Before General 11/4/08
11/04/08	0833	Savings Withdrawal - Steven Webb	\$250.00	30 Day After General 11/4/08
11/05/08	0833	Savings Withdrawal - Steven Webb	\$250.00	30 Day After General 11/4/08
11/07/08	0833	Savings Withdrawal - Steven Webb	\$150.00	30 Day After General 11/4/08
11/10/08	0833	Savings Withdrawal - Steven Webb	\$300.00	30 Day After General 11/4/08
11/12/08	0833	Savings Withdrawal - Steven Webb	\$100.00	30 Day After General 11/4/08
11/14/08	0833	Savings Withdrawal - Steven Webb	\$350.00	30 Day After General 11/4/08
11/21/08	0833	Savings Withdrawal - Steven Webb	\$40.00	30 Day After General 11/4/08
11/28/08	0833	Savings Withdrawal - Steven Webb	\$30.00	30 Day After General 11/4/08
04/10/09	0833	Transfer of Funds to Account No. *0528	\$275.00	July 2009 Quarterly
05/14/09	0833	Transfer of Funds to account *0874 to close this account named Extended Horizons	\$2.00	July 2009 Quarterly
06/09/09	0833	Savings Withdrawal - Steven Webb	\$15.00	July 2009 Quarterly
07/30/09	0833	Cash Withdrawal from Deposit	\$125.00	October 2009 Quarterly
08/04/09	0833	Savings Withdrawal - Steven Webb	\$100.00	October 2009 Quarterly
08/07/09	0833	Cash Withdrawal from Deposit	\$200.00	October 2009 Quarterly
08/19/09	0833	Savings Withdrawal - Steven Webb	\$160.00	October 2009 Quarterly
08/20/09	0833	Savings Withdrawal - Steven Webb	\$60.00	October 2009 Quarterly
08/25/09	0833	Savings Withdrawal - Steven Webb	\$50.00	October 2009 Quarterly

<b>Date</b>	<b>Acct.</b>	<b>Type of Withdrawal</b>	<b>Amount</b>	<b>Required Report</b>
09/28/09	0833	Savings Withdrawal - Steven Webb	\$175.00	October 2009 Quarterly
09/29/09	0833	Savings Withdrawal - Steven Webb	\$50.00	October 2009 Quarterly
10/21/09	0833	Savings Withdrawal - Steven Webb	\$130.00	January 2010 Quarterly
10/22/09	1195	Savings Withdrawal - Steve Webb	\$50.00	January 2010 Quarterly
10/23/09	1195	Savings Withdrawal - Steve Webb	\$200.00	January 2010 Quarterly
10/29/09	1195	Savings Withdrawal - Steve Webb	\$50.00	January 2010 Quarterly
10/29/09	1195	Savings Withdrawal - Steve Webb	\$150.00	January 2010 Quarterly
11/06/09	1195	Savings Withdrawal - Steve Webb	\$100.00	January 2010 Quarterly
11/10/09	1195	Savings Withdrawal - Steve Webb	\$50.00	January 2010 Quarterly
11/25/09	1195	Savings Withdrawal - Steve Webb	\$400.00	January 2010 Quarterly
12/03/09	1195	Telephone Withdrawal Request - Steven Webb	\$1,050.00	January 2010 Quarterly
12/09/09	1195	Savings Withdrawal - Steve Webb	\$50.00	January 2010 Quarterly
12/29/09	1195	Savings Withdrawal - Steve Webb	\$100.00	January 2010 Quarterly
12/30/09	1195	Savings Withdrawal - Steve Webb	\$100.00	January 2010 Quarterly
01/07/10	1195	Savings Withdrawal - Steve Webb	\$300.00	April 2010 Quarterly
01/27/10	1195	Debit Withdrawal - signed by Regina Cook	\$100.00	April 2010 Quarterly
02/08/10	1195	Savings Withdrawal - Steve Webb	\$400.00	April 2010 Quarterly
02/12/10	1195	Savings Withdrawal - Steve Webb	\$225.00	April 2010 Quarterly
03/22/10	1195	Savings Withdrawal - Steve Webb	\$55.00	April 2010 Quarterly
05/21/10	1195	Cash Withdrawal	\$300.00	July 2010 Quarterly
05/24/10	1195	Savings Withdrawal - Steve Webb	\$800.00	July 2010 Quarterly
06/03/10	1195	Savings Withdrawal - Steve Webb	\$100.00	July 2010 Quarterly

<b>Date</b>	<b>Acct.</b>	<b>Type of Withdrawal</b>	<b>Amount</b>	<b>Required Report</b>
06/07/10	1195	Savings Withdrawal - Steve Webb	\$300.00	July 2010 Quarterly
06/11/10	1195	Cash Withdrawal	\$400.00	July 2010 Quarterly
06/16/10	1195	Savings Withdrawal - Steve Webb	\$140.00	July 2010 Quarterly
06/16/10	1195	Savings Withdrawal - Steve Webb	\$968.76	July 2010 Quarterly
06/17/10	1195	Savings Withdrawal - Steve Webb	\$50.00	July 2010 Quarterly
06/18/10	1195	Savings Withdrawal - Steve Webb	\$1,000.00	July 2010 Quarterly
06/21/10	1195	Savings Withdrawal - Steve Webb	\$250.00	July 2010 Quarterly
06/22/10	1195	Savings Withdrawal - Steve Webb	\$50.00	July 2010 Quarterly
06/22/10	1195	Savings Withdrawal - Steve Webb	\$100.00	July 2010 Quarterly
06/23/10	1195	Savings Withdrawal - Steve Webb	\$500.00	July 2010 Quarterly
06/28/10	1195	Savings Withdrawal - Steve Webb	\$190.00	July 2010 Quarterly
07/01/10	1195	Savings Withdrawal - Steve Webb	\$550.00	8 Day Before 2010 Primary
07/02/10	1195	Cash Withdrawal	\$350.00	8 Day Before 2010 Primary
07/07/10	1195	Savings Withdrawal Steve Webb	\$250.00	8 Day Before 2010 Primary
07/14/10	1195	Savings Withdrawal - Steve Webb	\$400.00	8 Day Before 2010 Primary
07/15/10	1195	Savings Withdrawal - Steve Webb	\$350.00	8 Day Before 2010 Primary
07/16/10	1195	Savings Withdrawal - Steve Webb	\$100.00	8 Day Before 2010 Primary
07/16/10	1195	Savings Withdrawal - Steve Webb	\$2,405.60	8 Day Before 2010 Primary
07/19/10	1195	Savings Withdrawal - Steve Webb	\$150.00	8 Day Before 2010 Primary
07/21/10	1195	Savings Withdrawal Steve Webb	\$490.00	8 Day Before 2010 Primary
07/22/10	1195	Savings Withdrawal - Steve Webb	\$500.00	8 Day Before 2010 Primary
07/22/10	1195	Savings Withdrawal - Steve Webb	\$450.00	8 Day Before 2010 Primary
07/28/10	1195	Savings Withdrawal - Steve Webb	\$1,400.00	30 Day After 2010 Primary

<b>Date</b>	<b>Acct.</b>	<b>Type of Withdrawal</b>	<b>Amount</b>	<b>Required Report</b>
07/29/10	1195	Savings Withdrawal - Steve Webb	\$1,100.00	30 Day After 2010 Primary
08/02/10	1195	Savings Withdrawal - Steve Webb	\$150.00	30 Day After 2010 Primary
08/02/10	1195	Savings Withdrawal - Steve Webb	\$1,221.00	30 Day After 2010 Primary
08/03/10	1195	Savings Withdrawal - Steve Webb	\$620.00	30 Day After 2010 Primary
08/26/10	1195	Savings Withdrawal - Steve Webb	\$250.00	30 Day After 2010 Primary
08/27/10	1195	Transfer of funds to account *0528 (Steven Webb d/b/a SW Portrait Group)	\$250.00	30 Day After 2010 Primary
09/01/10	1195	Savings Withdrawal - Steve Webb	\$350.00	October 2010 Quarterly
09/03/10	1195	Savings Withdrawal - Steve Webb	\$150.00	October 2010 Quarterly
09/07/10	1195	Savings Withdrawal - Steve Webb	\$300.00	October 2010 Quarterly
09/10/10	1195	Savings Withdrawal - Steve Webb	\$50.00	October 2010 Quarterly
09/10/10	1195	Savings Withdrawal - Steve Webb	\$150.00	October 2010 Quarterly
09/14/10	1195	Savings Withdrawal - Steve Webb	\$50.00	October 2010 Quarterly
09/14/10	1195	Savings Withdrawal - Steve Webb	\$50.00	October 2010 Quarterly
09/20/10	1195	Savings Withdrawal - Steve Webb	\$503.00	October 2010 Quarterly
09/21/10	1195	Savings Withdrawal - Steve Webb	\$100.00	October 2010 Quarterly
09/24/10	1195	Savings Withdrawal - Steve Webb	\$50.00	October 2010 Quarterly
09/27/10	1195	Savings Withdrawal - Steve Webb	\$220.00	October 2010 Quarterly
09/28/10	1195	Savings Withdrawal - Steve Webb	\$60.00	October 2010 Quarterly
10/04/10	1195	Savings Withdrawal - Steve Webb	\$600.00	8 Day Before 2010 General
10/07/10	1195	Savings Withdrawal - Steve Webb	\$100.00	8 Day Before 2010 General
10/08/10	1195	Savings Withdrawal - Steve Webb	\$800.00	8 Day Before 2010 General

<b>Date</b>	<b>Acct.</b>	<b>Type of Withdrawal</b>	<b>Amount</b>	<b>Required Report</b>
10/12/10	1195	Savings Withdrawal - Steve Webb	\$790.00	8 Day Before 2010 General
10/18/10	1195	Savings Withdrawal - Steve Webb	\$500.00	8 Day Before 2010 General
10/18/10	1195	Savings Withdrawal - Steve Webb	\$600.00	8 Day Before 2010 General
10/20/10	1195	Savings Withdrawal - Steve Webb	\$1,000.00	8 Day Before 2010 General
10/22/10	1195	Transfer of funds to account *0528 (Steven Webb d/b/a SW Portrait Group)	\$50.00	8 Day Before 2010 General
10/22/10	1195	Savings Withdrawal - Steve Webb	\$225.00	8 Day Before 2010 General
10/25/10	1195	Savings Withdrawal - Steve Webb	\$50.00	8 Day Before 2010 General
10/26/10	1195	Savings Withdrawal - Steve Webb	\$50.00	8 Day Before 2010 General
10/26/10	1195	Savings Withdrawal - Steve Webb	\$100.00	8 Day Before 2010 General
10/27/10	1195	Savings Withdrawal - Steve Webb	\$370.00	8 Day Before 2010 General
11/01/10	1195	Savings Withdrawal - Steve Webb	\$900.00	8 Day Before 2010 General
11/08/10	1195	Savings Withdrawal - Steve Webb	\$60.00	8 Day Before 2010 General
12/23/10	1195	Savings Withdrawal - Steve Webb	\$225.00	April 2011 Quarterly
12/31/10	1195	Savings Withdrawal - Steve Webb	\$200.00	April 2011 Quarterly
01/03/11	1195	Savings Withdrawal - Steve Webb	\$3,020.00	April 2011 Quarterly
01/24/11	1195	Savings Withdrawal - Steve Webb	\$150.00	April 2011 Quarterly
01/25/11	1195	Transfer of funds to account *2645 (St. Louis Spartans Int'l Fund)	\$100.00	April 2011 Quarterly
03/11/11	1195	Savings Withdrawal - Steve Webb	\$200.00	April 2011 Quarterly
03/11/11	1195	Savings Withdrawal - Steve Webb	\$250.00	April 2011 Quarterly
05/09/11	1195	Savings Withdrawal - Steve Webb	\$40.00	July 2011 Quarterly

<b>Date</b>	<b>Acct.</b>	<b>Type of Withdrawal</b>	<b>Amount</b>	<b>Required Report</b>
06/21/11	1195	Savings Withdrawal - Steve Webb	\$200.00	July 2011 Quarterly
06/22/11	1195	Savings Withdrawal - Steve Webb	\$50.00	July 2011 Quarterly
06/24/11	1195	Savings Withdrawal Steve Webb	\$25.00	July 2011 Quarterly
06/24/11	1195	Savings Withdrawal - Steve Webb	\$225.00	July 2011 Quarterly
08/15/11	1195	Savings Withdrawal - Steve Webb	\$490.00	October 2011 Quarterly
10/07/11	1195	Savings Withdrawal - Steve Webb	\$250.00	January 2012 Quarterly
10/11/11	1195	Savings Withdrawal - Steve Webb	\$250.00	January 2012 Quarterly
10/17/11	1195	Savings Withdrawal - Steve Webb	\$500.00	January 2012 Quarterly
10/20/11	1195	Savings Withdrawal - Steve Webb	\$500.00	January 2012 Quarterly
10/21/11	1195	Savings Withdrawal - Steve Webb	\$300.00	January 2012 Quarterly
10/24/11	1195	Savings Withdrawal - Steve Webb	\$195.00	January 2012 Quarterly
10/26/11	1195	Cash Withdrawal	\$100.00	January 2012 Quarterly
10/28/11	1195	Transfer of funds to account *3174 (Steven Webb)	\$90.00	January 2012 Quarterly
10/28/11	1195	Transfer of funds to account *2660 (Spartan Basketball)	\$60.00	January 2012 Quarterly
11/09/11	1195	Savings Withdrawal - Steve Webb	\$100.00	January 2012 Quarterly
11/10/11	1195	Savings Withdrawal - Steve Webb	\$250.00	January 2012 Quarterly
11/17/11	1195	Savings Withdrawal - Steve Webb	\$300.00	January 2012 Quarterly
11/21/11	1195	Savings Withdrawal - Steve Webb	\$100.00	January 2012 Quarterly
11/22/11	1195	Transfer of funds account *3174 (Steven Webb)	\$200.00	January 2012 Quarterly
11/21/11	1195	Savings Withdrawal - Steve Webb	\$40.00	January 2012 Quarterly
11/23/11	1195	Savings Withdrawal Steve Webb	\$800.00	January 2012 Quarterly

<b>Date</b>	<b>Acct.</b>	<b>Type of Withdrawal</b>	<b>Amount</b>	<b>Required Report</b>
11/29/11	1195	Savings Withdrawal - Steve Webb	\$100.00	January 2012 Quarterly
12/30/11	1195	Savings Withdrawal - Steve Webb-Close Order Debit	\$38.28	January 2012 Quarterly
01/03/12	0209	Withdrawal to account *7027	\$500.00	April 2012 Quarterly
01/03/12	0209	Withdrawal to account *7027	\$150.00	April 2012 Quarterly
01/03/12	0209	Withdrawal to account *7027	\$150.00	April 2012 Quarterly
01/03/12	0209	Withdrawal to account *7027	\$100.00	April 2012 Quarterly
01/04/12	0209	Withdrawal to account *7027	\$200.00	April 2012 Quarterly
01/05/12	0209	Withdrawal to account *7027	\$540.00	April 2012 Quarterly
01/06/12	0209	Withdrawal to account *0195	\$354.00	April 2012 Quarterly
01/09/12	0209	Withdrawal to account *7400	\$230.00	April 2012 Quarterly
01/09/12	0209	Withdrawal to account *7400	\$200.00	April 2012 Quarterly
01/17/12	0209	Withdrawal to account *0195	\$100.00	April 2012 Quarterly
01/17/12	0209	Withdrawal to account *0195	\$50.00	April 2012 Quarterly
02/16/12	0209	Withdrawal to account *0195	\$600.00	April 2012 Quarterly
02/21/12	0209	ATM Withdrawal - Paseo Plaza (KC)	\$42.50	April 2012 Quarterly
06/13/12	0209	ATM Withdrawal - Florissant	\$20.00	July 2012 Quarterly
06/13/12	0209	ATM Withdrawal - Florissant	\$20.00	July 2012 Quarterly
06/20/12	0209	EB to account *7027	\$70.00	July 2012 Quarterly
06/20/12	0209	EB to account *7027	\$20.00	July 2012 Quarterly
06/28/12	0209	ATM Withdrawal US Bank (Florissant)	\$42.50	July 2012 Quarterly
06/29/12	0209	ATM Withdrawal BAC (KC)	\$52.00	July 2012 Quarterly
07/02/12	0209	EB to account *0195	\$150.00	8 Day Before 2012 Primary
07/02/12	0209	ATM Withdrawal Regions (Jennings)	\$100.00	8 Day Before 2012 Primary

<b>Date</b>	<b>Acct.</b>	<b>Type of Withdrawal</b>	<b>Amount</b>	<b>Required Report</b>
07/05/12	0209	ATM Withdrawal Petro Mart (Florissant)	\$22.50	8 Day Before 2012 Primary
07/09/12	0209	EB to account *0195	\$250.00	8 Day Before 2012 Primary
07/09/12	0209	ATM Withdrawal CBI Missouri	\$23.00	8 Day Before 2012 Primary
07/10/12	0209	ATM Withdrawal Arsenal CU	\$52.25	8 Day Before 2012 Primary
07/11/12	0209	ATM Withdrawal Regions (Brentwood)	\$240.00	8 Day Before 2012 Primary
07/11/12	0209	ATM Withdrawal First American (IL)	\$103.25	8 Day Before 2012 Primary
07/17/12	0209	ATM Withdrawal US Bank (QT-STL)	\$42.50	8 Day Before 2012 Primary
07/26/12	0209	ATM Withdrawal Holiday Inn (FL)	\$103.25	8 Day Before 2012 Primary
07/31/12	0209	Counter Check payable to self-cash out ticket	\$133.00	8 Day Before 2012 Primary
08/07/12	0209	ATM Withdrawal Regions (Florissant)	\$400.00	8 Day Before 2012 Primary
08/20/12	0209	EB to account *0195	\$100.01	8 Day Before 2012 Primary
08/20/12	0209	EB to account *0195	\$100.00	8 Day Before 2012 Primary
11/13/12	0209	EB to account *0195	\$86.14	30 Day After 2012 General
11/14/12	0209	EB to account *0195	\$100.00	30 Day After 2012 General
11/14/12	0209	EB to account *0195	\$50.00	30 Day After 2012 General
11/16/12	0209	Teller Cashed Check-Cash out ticket	\$200.00	30 Day After 2012 General
11/20/12	0209	Cash out from deposit	\$50.00	30 Day After 2012 General
		<b>TOTAL</b>	<b>\$48,634.54</b>	

**COUNT VII**

*Failure to timely file campaign finance disclosure reports, 24-hour notices of late contributions, and improper limited activity statements*

29. Respondents filed the following reports untimely and for the incorrect reporting periods:

<b>Report</b>	<b>Report Due</b>	<b>Report Filed</b>	<b>Reporting Period (Correct)</b>	<b>Reporting Period (Filed)</b>
July 2008 Quarterly Report	7/15/2008	8/12/2008		
8 Day Before Primary 8/5/2008	7/28/2008	8/12/2008		
30 Day After Primary 8/5/2008	9/4/2008	9/14/2008	7/25/2008-8/30/2008	8/5/2008-9/4/2008
October 2008 Quarterly Report	10/15/2008	10/26/2008	9/1/2008-9/30/2008	9/5/2008-9/30/2008
8 Day Before General 11/4/2008	10/27/2008	10/29/2008		
30 Day After General 11/4/2008	12/4/2008	12/15/2008	10/24/2008-11/29/2008	10/27/2008-12/4/2008
April 2009 Quarterly Report	4/15/2009	4/21/2009	11/29/2008-3/31/2009	12/5/2008-3/31/2009
July 2009 Quarterly Report	7/15/2009	7/21/2009		
October 2009 Quarterly Report	10/15/2009	10/18/2009	7/1/2009-9/30/2009	7/1/2010-9/30/2010
January 2010 Quarterly Report	1/15/2010	1/15/2010		
April 2010 Quarterly Report	4/15/2010	4/20/2010		
8 Day Before Primary 8/3/2010	7/26/2010	7/28/2010		
30 Day After Primary 8/3/2010	9/2/2010	9/13/2010	7/23/2010-8/28/2010	7/26/2010-9/2/2010
October 2010 Quarterly Report	10/15/2010	10/15/2010	8/29/2010-9/30/2010	9/1/2010-9/30/2010
8 Day Before General 11/2/2010	10/25/2010	11/1/2010		
30 Day After General 11/2/2010	12/2/2010	12/4/2010	10/22/2010-11/27/2010	10/25/2010-12/2/2010
April 2011 Quarterly Report	4/15/2011	5/11/2011	11/28/2010-3/31/2011	1/1/2011-3/31/2011
July 2011 Quarterly Report	7/15/2011	7/25/2011		
October 2011 Quarterly Report	10/15/2011	10/18/2011		

Report	Report Due	Report Filed	Reporting Period (Correct)	Reporting Period (Filed)
January 2012 Quarterly Report	1/15/2012	1/18/2012		
April 2012 Quarterly Report	4/15/2012	4/25/2012		
July 2012 Quarterly Report	7/15/2012	7/25/2012		
8 Day Before Primary 8/7/2012	7/30/2012	7/31/2012		
30 Day After Primary 8/7/2012	9/6/2012	10/23/2012		
October 2012 Quarterly Report	10/15/2012	11/27/2012	9/2/2012-9/30/2012	9/6/2012-9/30/2012
8 Day Before General 11/6/2012	10/29/2012	1/4/2013		
30 Day After General 11/6/2012	12/6/2012	1/4/2013	10/26/2012- 12/1/2012	10/25/2012- 12/1/2012
April 2013 Quarterly Report	4/15/2013	5/14/2013		

30. Respondents improperly filed a Statement of Limited Activity in lieu of a full October 2009 quarterly report, a time period in which Respondents received a total of \$1,075.08 in contributions and made a total of \$929 in expenditures.

31. Respondents improperly filed a Statement of Limited Activity in lieu of a full 30 Day After report for the 2010 General Election, a time period in which Respondents received a total of \$1,843 in contributions.

32. Respondents failed to timely report the following twenty-four transactions, on thirteen separate "24-hour Notice of Late Contributions," when Respondents received contributions in excess of \$250 within twelve days of an election:

Item Date	Posted Date	Acct. No.	Description	Contribution	Relevant Election
07/22/10	07/27/10	1195	Sheet Metal Workers Int'l Ass'n, Political Education Account 301 S Ewing St St. Louis, MO 63103	\$350.00	August 3, 2010 Primary

<b>Item Date</b>	<b>Posted Date</b>	<b>Acct. No.</b>	<b>Description</b>	<b>Contribution</b>	<b>Relevant Election</b>
07/20/10	07/27/10	1195	Bank of America PAC Maple St, 10th Floor St Louis, MO 63101	\$325.00	August 3, 2010 Primary
07/27/10	07/27/10	1195	Schlueter Mandel & Mandel LLP, Operating Account 1108 Olive St St. Louis, MO 63101	\$300.00	August 3, 2010 Primary
06/18/10	07/27/10	1195	Dealers Interested in Government PO Box 245 Jefferson City, MO 65102	\$300.00	August 3, 2010 Primary
03/26/10	07/28/10	1195	Penn National Gaming Inc 825 Berkshire Blvd Wyoming, PA 19610	\$300.00	August 3, 2010 Primary
07/28/10	07/29/10	1195	Dooley for St Louis County PO Box 16648 St Louis, MO 63105	\$500.00	August 3, 2010 Primary
07/28/10	07/30/10	1195	Clay Jr for Congress PO Box 4544 St Louis, MO 63108	\$500.00	August 3, 2010 Primary
	07/30/10	1195	Cash	\$300.00	August 3, 2010 Primary
07/01/10	08/02/10	1195	MHA PO Box 80 Jefferson City, MO 65102	\$500.00	August 3, 2010 Primary
07/27/10	08/02/10	1195	UP Railroad Company	\$300.00	August 3, 2010 Primary
07/23/10	08/02/10	1195	CWA District 6 Political Educ. Committee 10733 Sunset Office Dr., Ste. 201 St Louis, MO 63127	\$300.00	August 3, 2010 Primary

Item Date	Posted Date	Acct. No.	Description	Contribution	Relevant Election
09/17/10	10/26/10	1195	USPSPAC-Missouri, Chmn., Teri P McClure, Treas., Vicky De Los Santos 13818 Rider Trail Drive Earth City, MO 63045	\$350.00	November 2, 2010 General
10/21/10	11/01/10	1195	Pfizer Inc  New York NY 10017	\$500.00	November 2, 2010 General
09/28/10	11/01/10	1195	Pinnacle Entertainment 8918 Spanish Ridge Ave Las Vegas, NV 89148	\$500.00	November 2, 2010 General
07/17/12	07/27/12	0209	Rural Telecommunications Committee PAC PO Box 1865 Jefferson City, MO 65102	\$350.00	August 7, 2012 Primary
07/17/12	07/27/12	0209	MO BEV PAC PO Box 1066 Jefferson City, MO 65102	\$350.00	August 7, 2012 Primary
07/20/12	07/27/12	0209	SEIU Missouri State Council PAC 5685 Pershing Ste. 170 St Louis, MO 63139	\$500.00	August 7, 2012 Primary
07/29/12	07/30/12	0209	Clay Jr for Congress PO Box 4544 St Louis, MO 63106	\$1,500.00	August 7, 2012 Primary
08/01/12	08/01/12	0209	Committee to Elect Tommie L Pierson, Sr. 16545 Centerpointe Dr. Wildwood, MO 63040	\$2,000.00	August 7, 2012 Primary
08/02/12	08/03/12	0209	Rizzo for Missouri 511 Holmes St Kansas City, MO 64105	\$300.00	August 7, 2012 Primary
07/25/12	08/03/12	0209	Major Brands Inc PAC 6701 Southwest Ave S Louis, MO 63143	\$500.00	August 7, 2012 Primary
07/30/12	08/03/12	0209	PT-PAC of Missouri	\$500.00	August 7, 2012 Primary

Item Date	Posted Date	Acct. No.	Description	Contribution	Relevant Election
09/26/12	11/01/12	0209	MO Association of Nurse Anesthetists PAC	\$500.00	November 8, 2012 General
10/01/12	11/01/12	0209	Ameren Missouri PAC PO Box 780 Jefferson City, MO 65102	\$1,000.00	November 8, 2012 General
			<b>TOTAL</b>	<b>\$12,825.00</b>	

### COUNT VIII

#### *Failure to maintain committee records*

33. Respondents were served, pursuant to Sections 105.955.15(3) and 105.961.8(4), RSMo, in March 2012 with a subpoena *duces tecum* for the production of committee records.

34. Respondents did not provide any committee records in response to this subpoena.

35. On March 29, 2012, Respondent Webb attested that as a candidate he was “responsible to maintain accurate records and accounts” for his candidate committee, that he had received a subpoena *duces tecum* for his committee records, and that he had “no committee records in [his] possession which have not been provided to the Missouri Ethics Commission.”

### JOINT PROPOSED CONCLUSIONS OF LAW

#### COUNT I

#### *Official fund depository accounts*

36. Every committee shall have a single official fund depository within this state which shall be a federally or state-chartered bank, a federally or state-chartered savings and loan association, or a federally or state-chartered credit union in which the committee shall open and thereafter maintain at least one official depository account in its own name. §130.021.4(1), RSMo

37. An "official depository account" shall be a checking account or some type of negotiable draft or negotiable order of withdrawal account, and the official fund depository shall, regarding an official depository account, be a type of financial institution which provides a record of deposits, cancelled checks or other cancelled instruments of withdrawal evidencing each transaction by maintaining copies within this state of such instruments and other transactions. §130.021.4(1), RSMo

38. "All contributions which the committee receives in money, checks and other negotiable instruments shall be deposited in a committee's official depository account, and all expenditures it makes shall be through the committee's official fund depository." §130.021.2, §130.021.4(1), RSMo.

39. §130.021.7, RSMo specifies that every committee shall file an amended statement of organization within twenty days after a change has occurred in information previously reported.

40. All records and accounts of receipts and expenditures shall be preserved for at least three years after the date of the election to which the records pertain. §130.036.8, RSMo.

41. There is probable cause to believe that Respondents Webb and Friends of Steve Webb violated Sections 130.021.4(1) and 130.021.7, RSMo, by failing to utilize a single official depository account that qualified as a negotiable draft or negotiable order of withdrawal account until December 2011, and by failing to report changes in the official fund depository and name of the committee as provided on the official fund depository until April 22, 2011, and again between December 30, 2011, and April 4, 2012, and that Respondents did so knowingly.

## COUNT II

### *Commingling of committee and non-committee funds*

42. According to Section 130.021.4(1), RSMo, contributions received by a committee shall not be commingled with any funds of an agent of the committee, a candidate or any other person, except that contributions from a candidate of the candidate's own funds to the person's candidate committee shall be deposited to an official depository account of the person's candidate committee.

43. There is probable cause to believe that Respondents Webb and Friends of Steve Webb violated Section 130.021.4(1), RSMo, by commingling a \$250 contribution made payable to "Citizens for Hoskins" with contributions made to Friends of Steve Webb, and by commingling three contributions to Friends of Steve Webb, totaling \$1,325, with the funds of the St. Louis Spartans Basketball Club in account \*1161, and that Respondents did so knowingly.

## COUNT III

### *Unauthorized use of committee funds*

44. Section 130.034.2, RSMo, provides for the allowable uses of campaign finance committee funds.

45. Section 130.036, RSMo, requires a candidate and treasurer to maintain the records of each contribution and expenditures made for three years after the date of the date of the election to which the records pertain. "The records shall include name, address and amount pertaining to each contribution received or expenditure made and any bills, receipts, cancelled checks or other documents relating to each transaction." §130.036.7-.8, RSMo.

46. There is probable cause to believe that Respondents Webb and Friends of Steve Webb violated Sections 130.034 and 130.036, RSMo, by failing to use committee funds for any

allowable purpose, and by failing to maintain records necessary to substantiate the allowable use of contributions as detailed in paragraph 18 above, and that Respondents did so knowingly.

#### COUNT IV

##### *Failure to timely and accurately report contributions*

47. Contributions received by a committee and expenditures it makes shall be through the committee's official depository account. §130.021.2, §130.021.4(1), RSMo.

48. Section 130.058, RSMo, states that a candidate is ultimately responsible for all reporting requirements in Chapter 130, RSMo.

49. Section 130.041.1(2), RSMo, requires Respondents to report the amount of money on hand, including cash on hand at the beginning of each reporting period.

50. Section 130.046.3, RSMo, makes clear that "[e]ach report by such committee shall be cumulative from the date of the last report."

51. Respondents were required to file campaign finance disclosure reports that set forth receipts for the period, including the:

- (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;

...

(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.

52. There is probable cause to believe that Respondents Webb and Friends of Steve Webb violated Sections 130.021.2, 130.021.4(1), 130.041.1(2), 130.041.1(3), 130.046.3, and 130.058, RSMo, by failing to timely and accurately report contributions received by the committee and therefore to accurately report the money on hand in cumulative reports, and that Respondents did so knowingly.

#### COUNT V

##### *Failure to timely and accurately report expenditures*

53. Section 130.041.1(2), RSMo, requires Respondents to report the amount of money on hand, including cash on hand at the beginning of each reporting period.

54. Section 130.046.3, RSMo, makes clear that “[e]ach report by such committee shall be cumulative from the date of the last report.”

55. Respondents were required to file campaign finance disclosure reports setting forth expenditures for the period, including:

(a) The total dollar amount of expenditures made by check drawn on the committee's depository;

(b) The total dollar amount of expenditures made in cash;

...

(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.

56. Section 130.041.1(8), RSMo, requires a committee to report a separate listing by full name and address of any committee for which a transfer of funds or a contribution in any amount has been made during the reporting period, together with the date and amount of each such transfer or contribution.

57. There is probable cause to believe that Respondents Webb and Friends of Steve Webb violated Sections 130.041.1(2), 130.041.1(4), 130.041.1(8), and 130.046.3, RSMo, by

failing to file accurate, cumulative campaign finance reports with accurate money on hand and by failing to accurately report expenditures and contributions made to other committees from Respondents' official depository accounts, and that Respondents did so knowingly.

## COUNT VI

### *Cash contributions and expenditures in excess of limits*

58. According to Section 130.031.1, RSMo, no contribution of cash in an amount of more than one hundred dollars shall be made or accepted from any single contributor for any election by a candidate committee.

59. "Except for expenditures from a petty cash fund which is established and maintained by withdrawals from the committee's depository account and with records maintained pursuant to the recordkeeping requirements of section 130.036 to account for expenditures made from petty cash, 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. A single expenditure from a petty cash fund shall not exceed fifty dollars, and the aggregate of all expenditures from a petty cash fund during a calendar year shall not exceed the lesser of five thousand dollars or ten percent of all expenditures made by the committee during that calendar year. A check made payable to 'cash' shall not be made except to replenish a petty cash fund." §130.031.2, RSMo.

60. There is probable cause to believe that Respondents Webb and Friends of Steve Webb violated Sections 130.031.1 and 130.031.2, RSMo, by accepting cash contributions over the allowable limits, by making cash expenditures over the allowable limits, and that Respondents did so knowingly.

## COUNT VII

*Failure to timely file campaign finance disclosure reports, 24-hour notices of late contributions,  
and improper limited activity statements*

61. Respondents were required to file campaign finance disclosure reports 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; except that, a successful candidate who takes office prior to the twenty-fifth day after the election shall have complied with the report requirement of this subdivision if a disclosure report is filed by such candidate and any candidate committee under the candidate's control before such candidate takes office, and such report shall be for the period closing on the day before taking office; and

(3) Not later than the fifteenth day following the close of each calendar quarter.

§130.046.1, RSMo.

62. Respondents' campaign finance disclosure reports were required to be filed for the following periods:

The candidate, if applicable, treasurer or deputy treasurer of a committee shall file disclosure reports pursuant to this section, except for any calendar quarter in which the contributions received by the committee or the expenditures or contributions made by the committee do not exceed five hundred dollars. 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. No candidate, treasurer or deputy treasurer shall be required to file the quarterly disclosure report required not later than the fifteenth day of any January immediately following a November election, provided that such candidate, treasurer or deputy treasurer shall file the information required on such quarterly report on the quarterly report to be filed not later than the fifteenth day of April immediately following such November election. Each report by such committee shall be cumulative from the date of the last report. ...

§130.046.1, RSMo.

63. According to Section 130.046.5(2), RSMo,  
Notwithstanding any other provisions of this chapter to the  
contrary:

...

(2) No disclosure report needs to be filed for any reporting period if during that reporting period the committee has neither received contributions aggregating more than five hundred dollars nor made expenditure aggregating more than five hundred dollars and has not received contributions aggregating more than three hundred dollars from any single contributor and if the committee's treasurer files a statement with the appropriate officer that the committee has not exceeded the identified thresholds in the reporting period. Any contributions received or expenditures made which are not reported because this statement is filed in lieu of a disclosure report shall be included in the next disclosure report filed by the committee. This statement shall not be filed in lieu of the report for two or more consecutive disclosure periods if either the contributions received or expenditures made in the aggregate during those reporting periods exceed five hundred dollars. This statement shall not be filed, in lieu of the report, later than the thirtieth day after an election if that report would show a deficit of more than one thousand dollars.

64. According to Section 130.050.3, RSMo,

The receipt of any late contribution or loan of more than two hundred fifty dollars by a candidate committee supporting a candidate for statewide office or by any other committee shall be reported to the appropriate officer no later than twenty-four hours after receipt

65. There is probable cause to believe that Respondents Webb and Friends of Steve Webb violated Sections 130.046.1, 130.046.5(2), and 130.050.3, RSMo, by failing to timely file campaign finance disclosure reports and by failing to report twenty-four transactions totaling \$12,825, which should have been reported on thirteen “24-hour Notice of Late Contributions” reports, when Respondents received contributions in excess of \$250 each within twelve days of an election, and that Respondents did so knowingly.

### **COUNT VIII**

#### *Failure to maintain committee records*

66. Section 130.036, RSMo, requires a candidate and treasurer to maintain records of each contribution and expenditure made for three years after the date of the report to which the records pertain.

67. “The records shall include name, address and amount pertaining to each contribution received or expenditure made and any bills, receipts, cancelled checks or other documents relating to each transaction.” §130.036.7-.8, RSMo.

68. There is probable cause to believe that Respondents Webb and Friends of Steve Webb violated Section 130.036, RSMo, by failing to maintain records of each contribution and

expenditure made for three years after the date of the election to which the records pertain, 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 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 shall comply with all relevant sections of Chapter 130, RSMo.

b. Respondent Webb acknowledges that he pleaded guilty to, and served his sentence for, seven (7) misdemeanor violations of Missouri's campaign finance laws pursuant to the guilty plea agreement in Case No. 13SL-CR11263-01 in the Circuit Court of Saint Louis County.

c. It is the Order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$100,000, pursuant to Section 105.961.4(6), RSMo. However, if Respondents within sixty (60) days after the date of the Order pay \$1,440 of that fee, pay \$1,500 in late fees as adjudged in case 13AC-AC01616 in the Circuit Court of Cole County, and pay \$60 in late fees due for the late filing of Respondent Webb's 2014 personal financial disclosure statement, and if Respondents within ninety (90) days after the date of the Order file all reports and amendments to correct the reporting errors set forth in the stipulated

findings of fact and terminate Respondent Friends of Steve Webb, then the remainder of the \$100,000 fee will be stayed. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.

d. The parties agree that if and only if Respondent Webb fails to comply with the deadlines listed in paragraph 2.c above, the Missouri Ethics Commission shall have judgment against Respondents in the full amount of the fee that is still due and owing, and Respondent Webb shall execute together with this joint stipulation an affidavit of confession judgment in such amounts.

e. Respondents Webb and Friends of Steve Webb shall be jointly and severally liable for all fees imposed under this order.

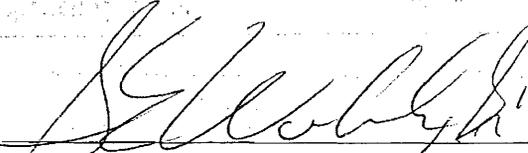
3. The parties consent to the entry of record and approval of this Joint Stipulation and to the termination of any further proceedings before the Commission based upon the Complaint filed by the Petitioner in the above action.

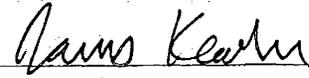
4. Respondents, together with their heirs, successors, and assigns, do hereby waive, release, acquit and forever discharge the Missouri Ethics Commission and its attorneys of or from any liability, claim, actions, causes of action, fees, costs and expenses, and compensation, including but not limited 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:**

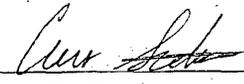
RESPONDENT STEVEN E. WEBB

PETITIONER MISSOURI ETHICS  
COMMISSION

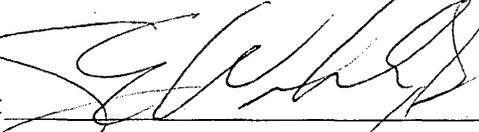
By:  12/15/14  
Steven E. Webb Date

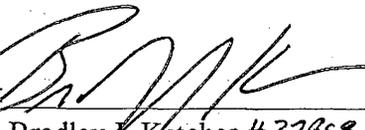
By:  1/8/15  
James Klahr Date  
Executive Director

By:  12/16/14  
Bradley J. Ketcher #37958 Date  
Attorney for Respondent  
Webb

By:  Jan. 8, 2015  
Curtis R. Stokes Date  
Attorney for Petitioner

RESPONDENT FRIENDS OF STEVE WEBB

By:  12/15/14  
Steven E. Webb Date  
Candidate

By:  12/16/14  
Bradley J. Ketcher #37958 Date  
Attorney for Respondent  
Friends of Steve Webb