

BEFORE THE  
MISSOURI ETHICS COMMISSION

Filed  
FEB 25 2015  
MISSOURI Ethics  
Commission

MISSOURI ETHICS COMMISSION, )  
)  
Petitioner, )  
) Case No. 14E236  
v. )  
)  
PRINTING CENTER LLC, )  
)  
Respondent. )

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 accepts as true the facts stipulated and finds that Printing Center LLC violated Section 130.031.8(4), RSMo.

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

1. Respondent shall comply with all relevant sections of Chapter 130, RSMo.
2. It is the order of the Missouri Ethics Commission that a letter be issued to Respondent notifying it of the requirements that printed matter relating to a candidate for public office be properly identified before accepting for publication or completing work on the printed matter, pursuant to Section 130.031.8, RSMo.

SO ORDERED this 25<sup>th</sup> day of February, 2015

By:



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



**MISSOURI ETHICS COMMISSION**

P.O. Box 1254  
Jefferson City, MO 65102  
[www.mec.mo.gov](http://www.mec.mo.gov)  
(573) 751-2020 / (800) 392-8660

James Klahr  
Executive Director

February 25, 2015

Joe Jacobson, Owner  
Printing Center LLC  
2655 Metro Boulevard  
Maryland Heights MO 63043

RE: MEC Case No. 14E236

Dear Mr. Jacobson:

A letter is issued to you pursuant to the authority granted to the Missouri Ethics Commission in Section 105.961.4(4), RSMo.

The Commission has accepted the submission of the 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 in this matter, a copy of which submission is marked as Exhibit A, attached hereto and incorporated herein by reference.

The Commission issues this reminder that under Section 130.031.8, RSMo, Printing Center LLC is required to obtain "paid for by" disclosure information before accepting for publication or printing or before completing work on any printed material related to a candidate or ballot measure.

Sincerely,

A handwritten signature in cursive script, reading "C. E. Weedman, Jr.", is written over a faint, larger version of the same signature.

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

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**BEFORE THE  
MISSOURI ETHICS COMMISSION**

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  )  
  Petitioner,    )  
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v.    )  
  )  
PRINTING CENTER LLC,                    )  
  )  
  Respondent.    )

Case No. 14E236

**JOINT STIPULATION OF FACTS, WAIVER OF HEARING  
BEFORE THE MISSOURI ETHICS COMMISSION, AND  
CONSENT ORDER WITH JOINT PROPOSED  
FINDINGS OF FACT AND CONCLUSIONS OF LAW**

The undersigned parties jointly stipulate to the facts and consent to the action set forth below.

The undersigned Respondent, Printing Center LLC, acknowledges that it has received and reviewed a copy of the Complaint filed by the Petitioner in this case, and the parties submit to the jurisdiction of the Missouri Ethics Commission.

The undersigned Respondent further acknowledges that it is aware of the various rights and privileges afforded by law, including but not limited to: the right to appear and be represented by counsel; the right to have all charges against Respondent be proven upon the record by competent and substantial evidence; the right to cross-examine any witnesses appearing at the hearing against Respondent; the right to present evidence on Respondent's behalf at the hearing; and the right to a decision upon the record of the hearing. Being aware of these rights provided to Respondent by operation of law, the undersigned Respondent knowingly and voluntarily waives each and every one of these rights and freely enters into this Joint Stipulation of Facts, Waiver of Hearing before the Missouri Ethics Commission, and Consent

Order with Joint Proposed Findings of Fact and Conclusions of Law, and agrees to abide by the terms of this document.

**I.**

Based upon the foregoing, the Petitioner and the undersigned Respondent jointly stipulate to the following and request that the Missouri Ethics Commission adopt as its own the Joint Proposed Findings of Fact and the Joint Proposed Conclusions of Law, as follows:

**JOINT PROPOSED FINDINGS OF FACT**

1. The Missouri Ethics Commission is an agency of the State of Missouri established pursuant to Section 105.955, RSMo, in part for the purpose of enforcing the provisions of Chapter 130, RSMo.

2. Respondent Printing Center, LLC, is a printing company located in Maryland Heights, Missouri.

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

4. Based on the 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.

5. Respondent Printing Center, LLC accepted for printing and publication, and completed work on, a flyer paid for by Rhonda Wiess, a true and accurate copy of which is attached hereto as Exhibit A, even though the flyer lacked the proper "paid for by" disclosure information.

6. Respondent Printing Center, LLC, should have obtained the "paid for by" disclosure information for the flyer referred to in Exhibit A, but it did not.

7. The flyer referred to in Exhibit A related to Proposition B, a ballot measure in the August 2014 election in the Maryland Heights Fire District.

8. The flyers referred to as Exhibit A were ultimately published, circulated, and distributed without a proper "paid for by" disclosure statement.

#### **JOINT PROPOSED CONCLUSIONS OF LAW**

9. "No person shall accept for publication or printing nor shall such work be completed until the printed matter is properly identifies as required." § 130.031.8, RSMo.

10. "Any person publishing, circulating, or distributing any printed matter relative to any candidate for public office or any ballot measure shall on the face of the printed matter identify in a clear and conspicuous manner the person who paid for the printed matter with the words "Paid for by" followed by the proper identification of the sponsor pursuant to this section." § 130.031.8, RSMo.

11. In regard to any printed matter paid for by an individual or individuals, it shall be sufficient identification to print the name of the individual or individuals and the respective mailing address or addresses, except that if more than five individuals join in paying for printed matter it shall be sufficient identification to print the words "For a list of other sponsors contact:" followed by the name and address of one such individual responsible for causing the matter to be printed, and the individual identified shall maintain a record of the names and amounts paid by other individuals and shall make such record available for review upon the request of any person. § 130.031.8(4), RSMo.

12. There is probable cause to believe that Respondent Printing Center LLC violated Section 130.031.8(4), RSMo, by accepting for publishing and printing and completing work on

the flyer referred to in Exhibit A without the “paid for by” disclosure statement required by Section 130.031.8, RSMo.

## 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 B.

a. Respondent shall comply with all relevant sections of Chapter 130, RSMo.

b. It is the Order of the Missouri Ethics Commission that a letter be issued to Respondent notifying it of the requirements that printed matter relating to a candidate for public office be properly identified before accepting for publication or completing work on the printed matter, pursuant to Section 130.031.8, RSMo.

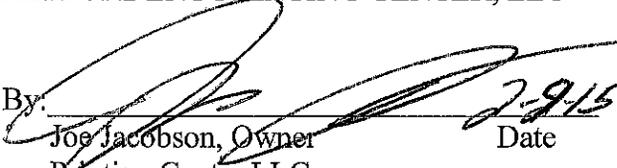
3. The parties consent to the entry of record and approval of this Joint Stipulation and to the termination of any further proceedings before the Commission based upon the Complaint filed by the Petitioner in the above action.

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

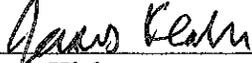
5. This joint stipulation does not settle, release, waive, or otherwise relieve Respondent from any late filing fees due to the appropriate filing authority, including Petitioner Missouri Ethics Commission. Respondent understands that late filing fees accrue automatically under Section 105.963, RSMo.

RESPONDENT PRINTING CENTER, LLC

PETITIONER MISSOURI ETHICS  
COMMISSION

By:   
Joe Jacobson, Owner  
Printing Center LLC

2-9-15  
Date

By:   
James Klahr  
Executive Director

2/25/15  
Date

By:   
Curtis R. Stokes  
Attorney for Petitioner

2/24/15  
Date

**PROP B - VOTE RESPONSIBLY**

**THINK BEFORE SPENDING**

House 2 Built in the early 1970's, newer than most of the houses in Maryland Heights.  
Would you have a new house if some else paid for it?

How often do they use the Training Facilities at House 2, do we really need another?

Look at the New Fire Trucks and Ambulances now in service.  
Are they not top of the line with the newest technology?



This will cost Taxpayers Hundreds of Dollars over the next 5+ years.  
Wouldn't it be better to use the money on your own home instead of someone else's?

Like any other Government Entity, you give them the money, they will spend it!

**PROP B  
VOTE RESPONSIBLY**



**THINK  
BEFORE  
SPENDING!**

*Ronda J. Weiss*

