



**Filed**  
**JAN 25 2016**  
Missouri Ethics  
Commission

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,            )  
  )  
  )            Case No. 15-0025-I  
  )  
v.    )  
  )  
LONDON KEY,                                )  
  )  
  )            Respondent.            )

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

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

The undersigned Respondent, Landon Key, acknowledges that he 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 he is aware of the various rights and privileges afforded by law, including but not limited to: the right to appear and be represented by counsel; the right to have all allegations 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 Key is a resident of Dellwood, Missouri.
3. On December 16, 2014, Respondent Key filed a declaration of candidacy for Ward 1 Alderman in Dellwood for the April 7, 2015, election, and withdrew that candidacy on January 20, 2015.
4. On Friday, December 19, 2014, Respondent Key placed an order for a mailer relative to the incumbent mayor of the City of Dellwood.
5. A true and accurate copy of this mailer is attached as *Exhibit 1*.
6. On February 4, 2015, Respondent Key placed an order for a second mailer relative to the incumbent mayor of the City of Dellwood.
7. A true and accurate copy of this mailer is attached as *Exhibit 2*.
8. Pursuant to Sections 105.957 and 105.961, RSMo, the Commission's staff investigated a complaint filed with the Commission and reported the investigation findings to the Commission.

9. 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.

10. Respondent Key circulated and distributed the mailers described at *Exhibit 1* and *Exhibit 2*.

11. Respondent Key sent an email to the printer for the mailer described at *Exhibit 1*, saying, "Good to go. Print it."

12. Respondent Key left a voicemail for the mailer described at *Exhibit 2* saying "This is Landon. Everything on that looks good. Go ahead and print it."

13. In response to an email informing Respondent Key that Missouri law requires the name and address of who paid for the mailer, Respondent Key sent the printer an email for the mailer described at *Exhibit 2*, saying "no return address is good."

14. The mailers described at *Exhibit 1* and *Exhibit 2* related to candidates in the April 2015 election in Dellwood, Missouri.

15. Respondent Key did not place an accurate "paid for by" disclaimer on the mailer described at *Exhibit 1*, choosing instead to place the phrase "Paid for by a concerned citizen of dellwood [sic]."

16. Respondent Key did not place an accurate "paid for by" disclaimer on the mailer described at *Exhibit 2*, choosing instead to place the phrase "Paid for by the Concerned Citizens of Dellwood," and failing to include a return address.

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

17. "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.

18. Printed matter includes "any pamphlet, circular, handbill, sample ballot, advertisement, including advertisements in any newspaper or other periodical, sign, including signs for display on motor vehicles, or other imprinted or lettered material. § 130.031.8, RSMo.

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

20. "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." § 130.031.8(4), RSMo.

21. "It shall be a violation of this chapter for any person required to be identified as paying for printed matter pursuant to subsection 8 of this section ... to refuse to provide the information required or to purposely provide false, misleading, or incomplete information." § 130.031.11, RSMo.

22. There is probable cause to believe that Respondent Key violated Sections 130.031.8 and 130.031.11, RSMo, by circulating and distributing two (2) printed mailers relating to candidates in the Dellwood election in April 2015, while failing and refusing to provide accurate and complete "paid for by" information for those mailers, and that Respondent 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. Respondent shall comply with all relevant sections of Chapter 130, RSMo.
  - b. It is the Order of the Missouri Ethics Commission that a fee is imposed against Respondent Landon Key in the amount of \$100.00, pursuant to Section 105.961.4(6), RSMo. The fee will be paid by check or money order made payable and sent to the Missouri Ethics Commission at the time of execution of this Joint Stipulation.
3. The parties consent to the entry of record and approval of this Joint Stipulation and to the termination of any further proceedings before the Commission based upon the Complaint filed by the Petitioner in the above action.
4. Respondent, together with his heirs, successors, and assigns, does hereby waive, release, acquit and forever discharge the Missouri Ethics Commission and its attorneys of or from any liability, claim, actions, causes of action, fees, costs and expenses, and compensation, including but not limited to, a claim for attorney's fees whatsoever which Respondent or

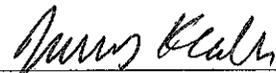
Respondent's attorney may now have or which they may hereafter have, which are based upon or arise out of the above cases.

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 LANDON KEY

By:   
Landon Key Date

PETITIONER MISSOURI ETHICS COMMISSION

By:  4/28/16  
James Klahr Date  
Executive Director

By:  1/15/16  
Curtis R. Stokes Date  
Attorney for Petitioner

To whom it may concern,

A little something for us to think about...

1) The last two administrations have received more than three quarters of a million dollars from our reserves to cover everyday operating expenses. There does not seem to be enough thought to realize that at some point cuts need to be made so costs and revenue generally match each other. This oversight from our administration has caused us to take a serious hit to the city's reserves, making it very unlikely that we'll have the necessary funds to cover potential disasters that could come our way.

2) The Mayor Reggie Jones appointed the former Mayor Loretta Johnson to the position of License Collector. She collected no license revenue, nor did she give any reports to the board as required by ordinance. She collected a salary and did no work for one year before she was appointed back to the board as an Alderman. I would stop just short of calling it a political appointment, which is illegal and unethical.

3) Mayor Reggie Jones has appointed someone to the seat of alderman in the first ward who was found to not have paid his personal property taxes, at the time of his appointment, as required by law. He then refused to remove him from the appointment, violating the codes and laws that he swore to uphold. He has repeatedly ignored calls to remove this individual from the office of Alderman.

223 N. Floridale Ave.  
St. Louis, MO 63135

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PERMIT # 1645



4) Mayor Jones has authorized city employees to take mulch to his and the city administrators residence, in city equipment, outside the boundaries of the city of Dellwood. He and the city administrator then threatened the employees with strong disciplinary actions if they talked to anyone, especially certain members of the board of alderman.

5) Mayor Reggie Jones used the city's equipment to promote himself in a parade that had nothing to do with the city of Dellwood. He deceitfully hid the payment of the bill until after the parade and then had it presented to the board for payment. This is just one instance where he has done something first and then asked the board to pay for it. It appears he has a history of doing what he wants to do and getting permission later.

6) He and the city administrator deliberately falsified information on the financial statement making it appear that the city was doing well. When in fact, the city has been operating in the red for the past three years. This is illustrated by the fact that at the end of each year, the administration has to ask the board to go into the reserves to meet year end obligations.

7) In light of the devastating damage done to Dellwood I find it absurd to present to the board of alderman and budget exceeding \$4,000,000. In the last three years, no money has been put in reserves. Which 1% is required each year by law.

8) If you wish to see which Alderman support this budget and which ones are looking out for the residents, then you must attend the board of alderman meeting Monday December 22, 2014 at Dellwood City Hall at 7:30pm

## "ENOUGH IS ENOUGH"

It is time to demand that the Mayor and the Board of Aldermen terminate the City Manager, *Cordaryl Patrick*.

"Don't be fooled!" The City of Dellwood was experiencing major problems LONG BEFORE the unfortunate death of Michael Brown and the terrible incidents that impacted our City before and after the Grand Jury decision. You don't have to take my word for it! Please come to the Aldermanic Meetings on the second and fourth Monday of the every month and see for yourself!

1. The City Manager let the City run out of salt! During a bad ice storm many residents were forced to miss days of work! The media spoke with Mr. Patrick and he said that our salt was on a barge on the river. At a much later meeting, the Board had no choice but to approve \$14,000 from the reserve fund to purchase salt of which was at a higher price due to the rush order.
2. The City Manager originally put in the 2015 City Budget for the city employees to get a pay raise; however, he admitted, at the same meeting, that the City was deficit spending! He also said that it is not unusual for a city to dip into their emergency funds to give pay raises! Really, all should do some research to verify such a statement.
3. The City Manager reported at a Board meeting that audits for 2013 and 2014 had not been done. Therefore, how can he report that the City is in good financial shape and there is no real proof?!
4. The City Manager reports a balanced budget. Then why does he have to continually go into the reserve fund to pay bills?! How can we have a balanced budget in 2015 when the first thing he asks for in the January 2015 meeting is \$145,000 to come out of the reserve fund? A balanced budget means making your expenditures meet your income, not the other way around. The City has been deficit spending for some time now! So why did the City Manager state, at the budget meeting in January of 2015, that the Board needed to come up with a plan. Shouldn't the plan come before the spending?
5. We have a contract with St Louis County for Police Service. However, at the most recent Board meeting, it was reported that the officers assigned to protect Dellwood had been pulled and sent to Ferguson on the night of the Grand Jury decision and that the School Resource Officers were sent to Dellwood. Why?
6. At the January 26, 2015 Board meeting, the City Manager admitted that the City was behind in its payments to the St. Louis County for police protection of our City. He stated we were two months behind but other sources say St Louis County has not been paid since September 2014, How would the 13 business owners who lost their livelihood and businesses feel if they know this? We, the people, need to order a forensic audit of the City's finances from 2011 to present!

ON any other job, would this incompetence be tolerated? Why is he still employed in this position?

### *Previous Tax Collector*

*Loretta Johnson*, when appointed as tax collector, did nothing as required for that position. When it was requested that she give a report, according to the ordinances there is to be a report given every six months at the Board meeting, no report was made nor did she collect anything. When she was appointed to take the vacant seat of the deceased Linda Cunningham, she illegally resigned her position as tax collector. After winning the election in 2014 for alderman, she failed to submit a proper resignation before the votes were certified; therefore, making her swearing in illegal as well. She brought up in the Board meeting that she didn't like an idea that was proposed because she stated it depended upon which side of the board one

is on. The only side the Board is supposed to be on is THE RESIDENTS. She has admitted that there is split in the Board. This can be proven by asking which of the number of Board members receive information and those that do not.

### *Mike Hell*

If you came to the meetings regularly, you would see that this alderman has a propensity to lash out at residents when they don't agree with him. He has been told numerous times by the Mayor and the Board members to stop this action. He has gone so far as to wish one resident an early demise. Once when residents, sitting in a Board meeting, stated, as Mike Hell was speaking, that he could not be heard, he lashed out and stood up with his hand pointing at residents saying that they don't ask anyone else to speak up and there is no need to ask him.

He has also threatened to "take out" another alderman as reported by a resident in regards to this current election. And he told another alderwoman that he is coming after her. He has reportedly bragged about being the "star quarterback" of his Junior and Senior year in high school yet there are residents who went to school with him who can prove that this was not true.

He has also told many people that he enlisted in the armed forces. Yet an exhaustive search has revealed no record of his enlistment. If he lies about these things, what else has he lied about?

### *Mayor Jones*

The current administration's platform is filled with impropriety. He ran on a campaign in 2013 with the promise of integrity. During the current administration's election, he appointed the elected tax collector, *Karmann Gladney*, to alderman of the third ward. There was no official resignation presented before or accepted by the Board when she was appointed to the alderman of the third ward. It was stated that she resigned prior to the Board meeting but it was not presented to the Board orally nor in writing. According to the Missouri Rules of Fourth Class Cities, an elected official's resignation must be accepted by the Board. No protocol was followed by the Mayor nor Ms. Gladney. On December 3, 2014, a city truck driven by a City street department employee was in an accident. The City employee was taken to have a drug test and the test came back positive for marijuana. The City Clerk and City Administrator have buried the truth and the employee is yet employed.

All these statements written above reflect on the leader of our City, the Mayor.

Please remember to come to the board meeting Monday February 9, 2015 @ 7:30pm at City Hall.