

Filed  
FEB 26 2014  
Missouri Ethics  
Commission

BEFORE THE  
MISSOURI ETHICS COMMISSION

MISSOURI ETHICS COMMISSION,

Petitioner,

v.

KACIE STARR TRIPLETT,  
Candidate,

and

FRIENDS OF KACIE STARR TRIPLETT,  
Candidate Committee,

Respondents.

Case No. 13A115

**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, Kacie Starr Triplett and Friends of Kacie Starr Triplett, 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**

Petitioner, by and through counsel, states for its cause of action against Respondents Kacie Starr Triplett and Friends of Kacie Starr Triplett as follows:

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 Triplett was a successful candidate for Alderman Ward 6 of the City of St. Louis in the April 3, 2007 and April 5, 2011 General Election. Respondent Triplett resigned as a St. Louis Alderman on or about November 18, 2012.

3. Respondent Friends of Kacie Starr Triplett is and was at all relevant times the candidate committee formed by Respondent Triplett to support her candidacy effective October 23, 2006 and is presently active.

4. The official fund depository is National City Bank Account No. ending in \*1089. The official fund depository was opened on October 23, 2006 and was closed in July 2012. Respondent Triplett, Jill P. Bass Triplett (the treasurer of Respondent committee), and Matthew A. Teter were signers on the official fund depository.

5. Respondents also received contributions and made expenditures through an account established through PayPal in the name of Friends of Kacie Starr Triplett.

6. In April 2013, the Commission, as part of a review of Respondent Committee requested committee records. Following that request, Respondent Kacie Starr Triplett voluntarily and of her own volition appeared in front of the staff of the Commission and provided information relevant to the complaint.

7. The Commission issued a subpoena for committee records to Respondents on September 12, 2013.

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

9. 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.

10. 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

### *Unauthorized Use of Committee Funds*

11. Respondents Kacie Starr Triplett failed to use committee funds for any allowable purpose or converted committee contributions to personal use and failed to maintain committee records to show the allowable use of committee funds.

12. By way of example and not limitation, Respondents failed to use committee funds for any allowable purpose and/or converted contributions to personal use from the official fund depository of at least \$8,000 and as much as \$18,900, as follows:

a. Payment of mortgage during the period of this complaint as follows:

02/03/10	\$1,165.37
08/30/10	\$1,158.05
09/02/10	\$1,096.20
01/06/11	\$1,031.00
<b>TOTAL</b>	<b>\$4,450.62</b>

b. Repayment of student loans to the United States Department of Education during the period of this complaint as follows:

02/15/11	\$321.86
03/31/11	\$321.86
<b>TOTAL</b>	<b>\$643.72</b>

c. Payment of a credit card bill to HSBC Card Services on February 16, 2010 in the amount of \$1,925.00.

d. Payment to the Missouri Department of Revenue on March 29, 2011 in the amount of \$82.71, and payment to The City of Brentwood Court on March 30, 2011 in the amount of \$90.00.

e. Payment to the University of Missouri St. Louis on June 30, 2010 for \$150.00.

f. Payment to Ameren UE as follows:

Speedpay Amerenue	12/24/10		\$252.75
Speedpay Amerenue	01/24/11		\$202.75
<b>TOTAL</b>			<b>\$455.50</b>

g. Telephone payment to Neighbors Credit Union on August 5, 2010 in the amount of \$1,038.51.

h. On December 13, 2010, Jill Bass Triplett paid into the committee's official depository account \$1,500.00 and on December 31, 2010, Respondents paid Jill Bass Triplett \$1,500.00 from the committee's official depository account.

i. Additional use of committee funds for purchases as follows:

<b>Category</b>	<b>Amount</b>
Purchase of Clothes, shoes, or jewelry at department and clothing stores	at least \$513.00
Return of Clothes, shoes, or jewelry at department and clothing stores	at least \$367.00
Cash	at least \$4,284.00
Food, Beverage and Entertainment	at least \$2,763.00
Salon & Spa Services	at least \$1,068.00
Health and Fitness and Massage Services	at least \$125.00
Hancock Fabrics, Home Depot, and Miscellaneous Stores	at least \$1021.00
GEICO Insurance	at least \$412.00
Gas	at least \$261.00

## **COUNT II**

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

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

<b>Contributor or Receipt</b>	<b>Date</b>	<b>Amount</b>
International Association of Fire Fighters Local #73	02/15/10	\$200.00
Christopher Molitor	02/18/10	\$50.00
Villa for Alderman	02/18/10	\$100.00
Maritza or Carmen Stock Ann Sueme	02/18/10	\$50.00
Cash	02/23/10	\$815.00
Hoisting Engineers Local 513	03/10/10	\$300.00
Henry Thompson	05/10/10	\$50.00
Randy Littlejohn, DBA Allstate Insurance	06/23/10	\$50.00
K.W.B	06/24/10	\$40.00
Clean Tech Company	06/25/10	\$250.00
Cash	06/28/10	\$350.00
Cash	06/28/10	\$615.00
D.E. Cooper	08/10/10	\$200.00
Committee to Elect Reed	09/09/10	\$200.00
Regstep Technologies	11/05/10	\$30.00
John or Christine Ingrassia	12/28/10	\$100.00
CASH	01/07/11	\$90.00
Christian Fundamental Church	01/12/11	\$100.00
Charles Troupe	01/25/11	\$250.00
Kenan Boone	02/04/11	\$250.00
Cash	02/04/11	\$394.00
Kacie Triplett	02/05/11	\$200.00
Villa Lighting Supply Co Inc	02/21/11	\$300.00
Cash	02/22/11	\$70.00
Cash	02/22/11	\$1,000.00
Carlton Bass	02/25/11	\$500.00
Cash	03/04/11	\$1,000.00
Eugene Wallace	03/04/11	\$25.00
Express Petroleum Inc.	03/05/11	\$1,000.00
Tim Person Jr. DBA Tim Person & Associates LLC	03/07/11	\$100.00
Nara Café LLC	04/26/11	\$100.00
William or Carol Clay	06/10/11	\$100.00
PNC Bank (auto charge off credit)	07/29/11	\$0.39
Cash	12/02/11	\$200.00

<b>Contributor or Receipt</b>	<b>Date</b>	<b>Amount</b>
Cash	12/02/11	\$500.00
Cash	12/19/11	\$370.00
Emogene Alexander	12/25/11	\$200.00
Mariette Shelton	01/18/12	\$200.00
Metro Publishing Group	01/30/12	\$150.00
Joan Briccetti	02/11/12	\$25.00
Nordstrom Rack	03/05/12	\$45.35
Express Petroleum Inc.	04/30/12	\$1,500.00
Crown 40 Inc.	05/04/12	\$500.00
IMPACT	05/22/12	\$698.45
St. Louis Association of Realtors PAC	06/07/12	\$300.00
Dress Barn (credit)	06/08/12	\$59.68
Kacie Triplett	06/08/12	\$500.00
Cash	06/18/12	\$10.00
Cash	06/18/12	\$300.00
Cash	06/18/12	\$300.00
Cash	07/11/12	\$20.00
<b>TOTAL</b>		<b>\$14,757.87</b>

14. Respondents failed to file accurate, cumulative campaign finance reports with accurate money on hand by failing to timely report the following contributions and receipts that were deposited into the committee's PayPal Account:

<b>Name</b>	<b>Date</b>	<b>Amount</b>
Barbara Boone	2/18/2010	\$50.00
Sal Martinez	3/2/2010	\$100.00
Connomin Brothers	6/9/2010	\$25.00
Forget Me Not Bed and Breakfast	6/11/2010	\$50.00
Jamala Rogers	6/23/2010	\$50.00
RDR314	7/29/2010	\$50.00
P Joseph McKee III	12/10/2010	\$500.00
Anton Krawat	2/9/2011	\$100.00
Paula Gianino	2/9/2011	\$100.00
Brookeshanna Hart	2/17/2011	\$50.00
Todd Patterson	3/2/2011	\$300.00
<b>TOTAL</b>		<b>\$1,375.00</b>

15. Respondents reported the following contributions that could not be identified in the official fund depository account, and that were not supported by accurate records:

<b>Report Name</b>	<b>Name</b>	<b>Date</b>	<b>Amount</b>
April 2010 Quarterly Report	Crown Foods	02/08/10	\$1,025.00
April 2010 Quarterly Report	International Association of Fire Fighters #73	02/18/10	\$50.00
April 2010 Quarterly Report	Danielle Cauley	02/18/10	\$30.00
April 2010 Quarterly Report	Sandra Gainey	02/18/10	\$50.00
April 2010 Quarterly Report	Naretha Hopson	02/18/10	\$30.00
April 2010 Quarterly Report	Steven Jackson	02/18/10	\$500.00
April 2010 Quarterly Report	Brenda Jones	02/18/10	\$30.00
April 2010 Quarterly Report	Mark Lammert	02/18/10	\$100.00
April 2010 Quarterly Report	Steve Smith	02/18/10	\$100.00
April 2010 Quarterly Report	Ronell Williams	02/18/10	\$25.00
April 2010 Quarterly Report	Marty Zunica	02/18/10	\$30.00
July 2010 Quarterly Report	Magretta Yokota	06/11/10	\$50.00
July 2010 Quarterly Report	JoAlma Houston	06/16/10	\$200.00
July 2010 Quarterly Report	Shawn Mickie	06/16/10	\$50.00
July 2010 Quarterly Report	Brandi Jones	06/18/10	\$50.00
July 2010 Quarterly Report	Michelle McDaneil	06/18/10	\$100.00
July 2010 Quarterly Report	Thane Wright	06/19/10	\$215.00
July 2010 Quarterly Report	Valetta Clark	06/21/10	\$50.00
July 2010 Quarterly Report	Bernard Halton	06/21/10	\$20.00
July 2010 Quarterly Report	Doris Hebron	06/21/10	\$20.00
July 2010 Quarterly Report	Willie Little	06/21/10	\$20.00
July 2010 Quarterly Report	Leon Ohara	06/21/10	\$50.00
July 2010 Quarterly Report	Alice Prince	06/21/10	\$20.00
July 2010 Quarterly Report	Liz Sharpe-Taylor	06/21/10	\$40.00
July 2010 Quarterly Report	Steven Smith	06/21/10	\$70.00
July 2010 Quarterly Report	Roberto Steele	06/21/10	\$100.00
July 2010 Quarterly Report	Marvin Sowers	06/28/10	\$100.00
July 2010 Quarterly Report	William Clay Sr.	07/13/10	\$100.00
October 2010 Quarterly Report	Roy Robinson Jr.	07/29/10	\$50.00
40 Day Before Special Charter Election-3/8/2011	Paric Corporation	12/17/10	\$100.00
40 Day Before Special Charter Election-3/8/2011	Juanita Green	01/13/11	\$25.00
8 Day Before Special Charter Election-3/8/2011	Norma Walker	02/14/11	\$2,000.00
8 Day Before Special Charter Election-3/8/2011	Elizabeth Beeks	02/17/11	\$50.00



<b>Report Name</b>	<b>Name</b>	<b>Date</b>	<b>Amount</b>
8 Day Before Special Charter Election-3/8/2011	Rev Carolyn Coleman	02/17/11	\$25.00
8 Day Before Special Charter Election-3/8/2011	Lula Durr	02/17/11	\$25.00
8 Day Before Special Charter Election-3/8/2011	Roxey & Donna Ellis	02/17/11	\$50.00
8 Day Before Special Charter Election-3/8/2011	Carolyn Eubanks	02/17/11	\$50.00
8 Day Before Special Charter Election-3/8/2011	Mary Johnson	02/17/11	\$25.00
8 Day Before Special Charter Election-3/8/2011	Rev Shaun Jones	02/17/11	\$25.00
8 Day Before Special Charter Election-3/8/2011	Beverly Jones	02/17/11	\$15.00
8 Day Before Special Charter Election-3/8/2011	Mary Jones	02/17/11	\$20.00
8 Day Before Special Charter Election-3/8/2011	Charles & Estelle Kirkwood	02/17/11	\$50.00
8 Day Before Special Charter Election-3/8/2011	Thomas & Judi Mitchell	02/17/11	\$25.00
8 Day Before Special Charter Election-3/8/2011	Jackie Perry	02/17/11	\$30.00
8 Day Before Special Charter Election-3/8/2011	Jessica Solomon	02/17/11	\$25.00
8 Day Before Special Charter Election-3/8/2011	Ben & Dani Taylor	02/17/11	\$50.00
8 Day Before General Election-4/5/2011	Crown Mart	03/03/11	\$1,000.00
8 Day Before General Election-4/5/2011	Kezmiche Atterbury	03/04/11	\$50.00
8 Day Before General Election-4/5/2011	Liz Beeks	03/04/11	\$25.00
8 Day Before General Election-4/5/2011	Joshua Stevens	03/04/11	\$50.00
8 Day Before General Election-4/5/2011	David Weiss	03/06/11	\$25.00
8 Day Before General Election-4/5/2011	Michael Allen	03/07/11	\$30.00
January 2012 Quarterly Report	F&C Truck Sales & Service	12/12/11	\$325.00
January 2012 Quarterly Report	Luckie Cooks	12/12/11	\$5.00
January 2012 Quarterly Report	Donnell Criswell	12/12/11	\$25.00

<b>Report Name</b>	<b>Name</b>	<b>Date</b>	<b>Amount</b>
January 2012 Quarterly Report	Tiffany Days	12/12/11	\$20.00
January 2012 Quarterly Report	Lisa Hinton	12/12/11	\$25.00
January 2012 Quarterly Report	David Holmes	12/12/11	\$100.00
January 2012 Quarterly Report	Beverly Jones	12/12/11	\$20.00
January 2012 Quarterly Report	Norma Lumpford	12/12/11	\$30.00
January 2012 Quarterly Report	Jacqueline Philips	12/12/11	\$100.00
January 2012 Quarterly Report	Robert Bridget Webb	12/12/11	\$20.00
January 2012 Quarterly Report	Lyn DeMoss	12/25/11	\$25.00
July 2012 Quarterly Report	Crown 40 Inc.	05/04/12	\$1,000.00
October 2012 Quarterly Report	AFSCME Missouri People Public Employees Organized to Promote Legislative Equality	08/17/12	\$500.00
<b>TOTAL</b>			<b>\$9,240.00</b>

16. Respondents reported a contribution from Rev. Alfred & Sandra Gainey on February 17, 2011 in the amount of \$100.00 on the 8 Day Before Special Charter Election dated 3/8/2011. Respondents deposited a check in the amount of \$50.00 in the official fund depository from “Alfred Gainey” on February 17, 2011. As a result, Respondents either failed to report the contributions above or inaccurately reported the same contribution.

17. Respondents failed to file accurate, cumulative campaign finance reports with accurate money on hand by failing to timely and accurately report the employer or occupation for the following contributions and miscellaneous receipts that were deposited into the official fund depository accounts:

<b>Report Name</b>	<b>Contributor</b>	<b>Date</b>	<b>Amount</b>
April 2010 Quarterly	Donna Hagerty Payne 2114 Lafayette St Louis, MO 63104	1/19/2010	\$500.00
April 2010 Quarterly	Jim Jones 2707 Barrett Springs Court St Louis, MO 63104	2/6/2010	\$1,000.00
April 2010 Quarterly	Grace Tenant 1324 Washington St Louis, MO 63103	2/10/2010	\$325.00
April 2010 Quarterly	Steven Jackson 1276 Hodiamont St Louis, MO 63112	2/18/2010	\$500.00
April 2010 Quarterly	Husch Blackwell 190 Carondelet Ste. 600 St Louis, MO 63105	2/15/2010	\$325.00
April 2010 Quarterly	Charles Kirkwood 8686 Tucker St Louis, MO 63104	2/17/2010	\$125.00
April 2010 Quarterly	Eric & Mary Thoelle 3001 Locust St Louis, MO 63103	2/18/2010	\$500.00
April 2010 Quarterly	Shilpa Sheevam 12332 Ballas Ln. St Louis, MO 63131	2/18/2010	\$250.00
April 2010 Quarterly	Jason Spain 1917 Washington St Louis, MO 63103	2/18/2010	\$250.00
July 2010 Quarterly	Cindy Musterman 2115 Victor Street St Louis, MO 63104	6/2/2010	\$350.00
July 2010 Quarterly	Charlene Jones 9 Aberdeen Pl St Louis, MO 63105	6/6/2010	\$250.00
July 2010 Quarterly	James Bissell 114 Hawthorne Ests St Louis, MO 63131	6/7/2010	\$250.00
July 2010 Quarterly	Andria Simckes 139 Ladue Oaks Dr St Louis, MO 63141	6/8/2010	\$200.00
July 2010 Quarterly	Ken Marshall 821 S. Bemiston Ave St Louis, MO 63105	6/8/2010	\$250.00

<b>Report Name</b>	<b>Contributor</b>	<b>Date</b>	<b>Amount</b>
July 2010 Quarterly	Mike McAvoy 20434 Park Ave St Louis, MO 63104	6/10/2010	\$250.00
July 2010 Quarterly	Robert Butler 3408 Longfellow St Louis, MO 63104	6/10/2010	\$250.00
July 2010 Quarterly	Marietta Shelton 4400 Lindell Blvd. Apt 5N St Louis, MO 63108	6/11/2010	\$250.00
July 2010 Quarterly	Dennis Flatness 308 N 21 Street St Louis, MO 63103	6/15/2010	\$325.00
July 2010 Quarterly	Barbara Boone 10210 Miguelita Road San Jose, CA, MO 95127	6/15/2010	\$250.00
July 2010 Quarterly	Pearlie Evans 5011 Kingshighway Blvd St Louis, MO 63115	6/16/2010	\$300.00
July 2010 Quarterly	Steven Cousins 4629 Pershing Place St Louis, MO 63108	6/17/2010	\$150.00
July 2010 Quarterly	Anne Kasal 1200 S 18th St St Louis, MO 63104	6/17/2010	\$250.00
July 2010 Quarterly	Bruce Kraemer 3248 Copeline Avenue St Louis, MO 63104	6/19/2010	\$250.00
July 2010 Quarterly	Paul Friedman 142 Ladue Farm Rd St Louis, MO 63141	6/19/2010	\$325.00
July 2010 Quarterly	Thane Wright 3009 Magnolia St Louis, MO 63104	6/19/2010	\$215.00
July 2010 Quarterly	Peter Snyder 2012 Lafayette Ave St Louis, MO 63104	6/19/2010	\$150.00
July 2010 Quarterly	Marilyn Stubblefield 1900 Oregon Ave St Louis, MO 63104	6/19/2010	\$350.00
July 2010 Quarterly	Aheva McDonald 4501 Maryland Ave St Louis, MO 63108	6/19/2010	\$325.00

<b>Report Name</b>	<b>Contributor</b>	<b>Date</b>	<b>Amount</b>
July 2010 Quarterly	Cheryl Walker 2729 St. Vincent St Louis, MO 63104	6/19/2010	\$250.00
July 2010 Quarterly	Kathleen Ratcliffe 4909 Laclede Ave #2003 St Louis, MO 63108	6/20/2010	\$200.00
July 2010 Quarterly	Charles Troupe 5353 Union Blvd St Louis, MO 63115	6/25/2010	\$500.00
July 2010 Quarterly	Mary Anne Sedey 3323 Russell St. Louis, MO 63104	6/29/2010	\$200.00
July 2010 Quarterly	Sal Martinez P.O. Box 21413 St Louis, MO 63115	7/7/2010	\$200.00
40 Day Before Special Charter Election- 3/8/2011	Ed Finkelstein 505 S. Ewing Ave. St Louis, MO 63103	12/13/2010	\$100.00
<b>TOTAL</b>			<b>\$10,165.00</b>

### **COUNT III**

*Violation of Missouri laws prohibiting the acceptance of anonymous and cash contributions in excess of allowable limits without filing of a fundraising statement to support those contributions*

18. The following cash deposits were identified in the official fund depository account which could not be identified as single cash contributions of \$100 or less made or accepted by a single contributor through committee records, and Respondents failed to file fundraising statements to support the cash contributions:

<b>Date on Bank Statement</b>	<b>Amount</b>
02/23/10	\$815.00
06/28/10	\$350.00
06/28/10	\$615.00
01/07/11	\$90.00
02/04/11	\$394.00
02/22/11	\$70.00
02/22/11	\$1,000.00
03/04/11	\$1,000.00
12/02/11	\$500.00
12/02/11	\$200.00
12/19/11	\$370.00
06/18/12	\$300.00
06/18/12	\$300.00
	<b>\$6,004.00</b>

19. Respondents held fundraiser events on or about February 18, 2010 and June 28, 2010.

20. Respondents failed to file a fundraising statement on the April 2010 and July 2010 Quarterly Reports with the information required under Section 130.031.6, RSMo.

21. Without filing a fundraising statement, and without maintaining proper committee records, Respondents failed to properly report contributions received which may have been anonymous contributions or contributions in excess of the limit for cash contributions from a sole contributor.

#### **COUNT IV**

##### *Failure to timely and accurately report expenditures and contributions made to committees*

22. Respondents failed to file timely, accurate, and cumulative campaign finance reports with accurate money on hand by failing to timely report the following expenditures that each exceeded one hundred dollars from the official fund depository accounts, beginning with the April 2010 Quarterly Report, as follows:

Name	Date	Amount	Payment Type	Notes on Check
Mortgage Payment	02/03/10	\$1,165.37	EFT	
HSBC Card Services Online Payment	02/16/10	\$1,925.00	EFT	CC payment
Collective Catering	02/18/10	\$350.00	1155	1410 Ohio
Travis'	03/02/10	\$150.00	1136	Photographer
Economical Mail	03/03/10	\$1,412.88	1143	628 loehr estates 63021
Mulligan Printing	03/03/10	\$2,043.59	1137	49334
Kacie Triplett	03/10/10	\$300.00	Other	
AT&T	03/18/10	\$191.54	EFT	Reimbursement
Patrick Jakopchek	04/07/10	\$600.00	1138	Deposit
Patrick Jakopchek	04/07/10	\$609.00	1135	March & April
Cash	05/10/10	\$2,500.00	1191	
St Louis City NAACP	06/18/10	\$850.00	1140	
Radio One – St. Louis	06/18/10	\$1,000.00	EFT	
ATTM	06/21/10	\$371.17	Check card	
Tuckers Place	06/22/10	\$110.75	Check card	
The Ink Spot Inc.	06/23/10	\$1,249.41	Check card	
St Louis Rega	06/24/10	\$2,309.00	Check card	Programs and Cards
Alex Ross Kinkade	06/25/10	\$120.00	1142	June Cards
UMSL	06/30/10	\$150.00	1150	
Van Goghz Martini Bar	07/08/10	\$102.71	Check card	
Top Gunn Associates	07/12/10	\$200.00	Check card	
Target	08/03/10	\$249.52	Check card	
Kings Beauty Supply	08/04/10	\$121.49	Check card	
Tel Pmt Payment	08/05/10	\$1,038.51	ACH	
Southwestair	08/11/10	\$382.10	Check card	
ATTM	08/17/10	\$225.69	Check card	
Southwestair	08/18/10	\$381.40	Check card	
Regstep Technologies	08/27/10	\$130.00	Check card	
Four Seasons Hotel F&B	08/31/10	\$102.57	Check card	
Wiley Price	08/26/10	\$150.00	1265	
Mortgage Payment	09/02/10	\$1,096.20	ACH	
Stephen Bolen	09/08/10	\$200.94	1267	Website Deposit
ATTM	09/14/10	\$186.80	Check card	
Easy Click Travel Lodging	09/21/10	\$104.78	Check card	
Zhanglinlin	09/27/10	\$261.71	Check card	
Hong Xiang Shang Wu Hu	09/29/10	\$264.34	Check card	
Hotels.com	10/04/10	\$226.06	Check card	
ATTM	10/13/10	\$176.64	Check card	

Name	Date	Amount	Payment Type	Notes on Check
Yummies	10/20/10	\$333.34	1200	Oldies but Goodies
ATTM	11/17/10	\$265.63	Check card	
AT&T	11/22/10	\$140.92	Check card	
Withdrawal	12/02/10	\$400.00	Other	
GEICO	12/02/10	\$206.30	2189/719	
Hampton	12/13/10	\$102.50	ATM	
Speedpay Amerenue	12/24/10	\$252.75	Check card	
Mortgage Payment	01/06/11	\$1,031.00	ACH	
PNC Bank	01/11/11	\$500.00	Other	
ATTM	01/14/11	\$153.96	Check card	
PNC Bank	01/21/11	\$250.00	Other	
Speedpay Amerenue	01/24/11	\$202.75	Check card	
GEICO	01/25/11	\$206.30	Check card	
Withdrawal	01/26/11	\$140.00	Other	
ATTM	02/15/11	\$145.65	Check card	
US Department of Education	02/15/11	\$321.86	Check card	
Office Max	02/22/11	\$139.07	POS	
O R Pechman Co	02/22/11	\$299.44	Check card	
Withdrawal	02/25/11	\$120.00	Other	
USPS	03/04/11	\$607.15	POS	
Withdrawal	03/08/11	\$290.00	Other	
ATTM	03/15/11	\$145.65	Check card	
Shi Salon	03/18/11	\$150.00	Check card	
PNC Bank - ATM Withdrawal	03/28/11	\$101.95	ATM	
PNC Bank - ATM Withdrawal	03/29/11	\$200.00	ATM	
US Department of Education	03/31/11	\$321.86	Check card	
ATTM	04/18/11	\$148.09	Check card	
ATTM	05/17/11	\$150.47	Check card	
AT&T	06/16/11	\$150.47	ACH	
Patrick Jakopchek	12/16/11	\$1,367.02	1061	Oct partial, Nov & Dec
Apply Online Store	01/06/12	\$1,250.69	Check card	
ATTM	01/13/12	\$152.60	Check card	
Yummies	02/07/12	\$748.50	1091	Serving Homeless
AT&T	02/21/12	\$148.33	ACH	
Patrick Jakopchek	03/07/12	\$150.00	1033	DWOC
Airtranair	03/12/12	\$349.20	Check card	
AT&T	03/14/12	\$153.33	ACH	



Name	Date	Amount	Payment Type	Notes on Check
Dress Barn	03/16/12	\$109.40	Check card	
Gamma Omega	02/01/12	\$250.00	1064	1/2 page ad for carol clay
Sas	03/20/12	\$848.40	Check card	
USAirways	03/21/12	\$230.60	Check card	
AT&T	04/19/12	\$148.33	ACH	
Scandic Hotel	04/27/12	\$753.47	Check card	
Vashon Alumni Association	10/20/10	\$150.00	1196	
<b>TOTAL</b>		<b>\$37,296.15</b>		

23. Respondents failed to file timely accurate, cumulative campaign finance reports with accurate money on hand by failing to timely report the following expenditures of one hundred dollars or less, from the official fund depository accounts:

<b>Unreported Expenditures</b>				
Expenditure	Date	Amount	Payment Type	Category of Expenditure or Notes
Diners Delight	01/08/10	\$75.00	1127	
PNC Bank	03/01/10	\$10.00	Other	Deposited Item Returned Charge
PNC Bank	03/01/10	\$100.00	Other	Deposited Item Returned
Kacie Triplett	03/17/10	\$100.00	Other	Withdrawal
Jerome Mary	03/29/10	\$70.00	1134	
Kings Beauty Supply	06/21/10	\$4.29	Check Card	
Rasoi	06/21/10	\$17.27	Check Card	
JCPenney	06/21/10	\$34.72	Check Card	
Vindeset	06/21/10	\$53.73	Check Card	
Cheesecake	06/21/10	\$68.65	Check Card	
Macy's	06/21/10	\$74.96	POS	
Van Gogh's Martini Bar	07/02/10	\$15.65	Check Card	
Cash	07/03/10	\$100.00	1269	
MPI	07/07/10	\$21.08	Check Card	
Lucas Park Grille	07/12/10	\$52.00	Check Card	

Unreported Expenditures				
Expenditure	Date	Amount	Payment Type	Category of Expenditure or Notes
Culinaria Schnucks	07/16/10	\$11.80	POS	
PNC Bank	07/22/10	\$50.00	Other	Ret Redeposit
PNC Bank	08/02/10	\$30.00	Service Charge	Service Charge
Target	08/03/10	\$10.84	Check Card	
Dave's BP	08/03/10	\$35.91	Check Card	
The Ink Spot Inc	08/04/10	\$43.40	Check Card	
Harrys Restaurant & Bar	08/05/10	\$22.55	Check Card	
PNC Bank	08/06/10	\$50.00	Other	Return Deposited Item
Lola	08/09/10	\$10.00	Check Card	
Rooster	08/09/10	\$24.79	Check Card	
Walgreens	08/11/10	\$22.72	POS	
Walter Knoll Florist	08/11/10	\$46.34	Check Card	
Walter Knoll Florist	08/11/10	\$46.34	Check Card	
Saffron	08/16/10	\$84.05	Check Card	
Wal-Mart	08/16/10	\$94.92	POS	
Nadoz Euro Bakers Café	08/19/10	\$20.88	Check Card	
The London Tea Room	08/20/10	\$2.20	Check Card	
The U	08/20/10	\$18.31	Check Card	
Harrys Restaurant & Bar	08/20/10	\$40.00	Check Card	
Gelateria Tavolini	08/23/10	\$5.94	Check Card	
Lombardos Restaurant	08/23/10	\$43.95	Check Card	
The Drunken Fish	08/27/10	\$63.23	Check Card	
Lucas Park Grille	08/30/10	\$25.95	Check Card	
PNC Bank	09/01/10	\$10.00	Service Charge	Service Charge
Hudson News CM	09/10/10	\$6.95	Check Card	
Kings Beauty Supply	09/10/10	\$71.58	Check Card	
SWA Inflight WIFI	09/14/10	\$7.00	Check Card	

Unreported Expenditures				
Expenditure	Date	Amount	Payment Type	Category of Expenditure or Notes
Crews of California	09/14/10	\$16.34	Check Card	
Westin	09/14/10	\$92.84	Check Card	
Van Gogh's Martini Bar	09/15/10	\$20.92	Check Card	
Smoking Joe's	09/15/10	\$26.59	Check Card	
PNC Bank	09/21/10	\$2.62	Service Charge	International POS Fee
Crews of California	09/21/10	\$3.29	Check Card	
Starbucks	09/21/10	\$10.80	Check Card	
Cara Spencer	03/16/10	\$100.00	1177	
PNC Bank	09/27/10	\$6.54	Service Charge	International POS Fee
PNC Bank	09/28/10	\$0.82	Service Charge	International POS Fee
Shanghai Ji Yuan Zhu B	09/28/10	\$32.87	Check Card	
PNC Bank	09/29/10	\$6.61	Service Charge	International POS Fee
PNC Bank	09/30/10	\$0.22	Service Charge	International POS Fee
PNC Bank	09/30/10	\$0.30	Service Charge	International POS Fee
PNC Bank	09/30/10	\$0.34	Service Charge	International POS Fee
Ri Yi Can Yin	09/30/10	\$8.69	Check Card	
Starbucks	09/30/10	\$9.71	Check Card	
Ji Jie Jing Mao	09/30/10	\$11.83	Check Card	
Ji Jie Jing Mao	09/30/10	\$13.63	Check Card	
Rue Lafayette	10/04/10	\$9.22	Check Card	
Studio Nails and Spa	10/04/10	\$26.00	Check Card	
Kings Beauty Supply	10/04/10	\$57.49	Check Card	
Hilton Norfolk	10/05/10	\$27.61	Check Card	
Hancock Fabrics	10/12/10	\$37.54	Check Card	
Hancock Fabrics	10/13/10	\$54.26	Check Card	
Recurring Check Card Clear	10/13/10	\$50.79	ATM	Monthly Internet Fee

Unreported Expenditures				
Expenditure	Date	Amount	Payment Type	Category of Expenditure or Notes
UMSL Accounts Receivable	10/19/10	\$30.00	Check Card	
The Drunken Fish	10/20/10	\$85.45	Check Card	
Walter Knoll Florist	10/25/10	\$49.85	1197	
Rue Lafayette	10/27/10	\$11.08	Check Card	
PNC Bank	10/28/10	\$19.99	Service Charge	Check Printing Fee
Panera Bread	11/08/10	\$1.72	Check Card	
Panera Bread	11/08/10	\$16.06	Check Card	
Aldi	11/08/10	\$31.23	POS	
Walgreens	11/08/10	\$84.02	Check Card	
The London Tea Room	11/12/10	\$2.75	Check Card	
Gelateria Tavolini	11/12/10	\$3.36	Check Card	
Walgreens	11/12/10	\$5.35	POS	
The London Tea Room	11/12/10	\$7.42	Check Card	
Recurring Check Card Clear	11/15/10	\$45.42	POS	Monthly Internet Fee
The U	11/18/10	\$7.47	Check Card	
Studio Nails and Spa	11/18/10	\$18.00	Check Card	
Gelateria Tavolini	11/22/10	\$2.47	Check Card	
Milos	11/22/10	\$3.75	Check Card	
Sub Zero Vodka Bar	11/22/10	\$28.65	Check Card	
Arcelias Mexicana	11/22/10	\$71.35	Check Card	
Gelateria Tavolini	11/26/10	\$8.69	Check Card	
Hancock Fabrics	11/29/10	\$10.12	Check Card	
Gelateria Tavolini	12/01/10	\$3.24	Check Card	
Harrys Restaurant & Bar	12/01/10	\$62.40	Check Card	
Café Ventana	12/03/10	\$1.79	Check Card	
Yummies	12/03/10	\$9.89	Check Card	
Culinaria Schnucks	12/06/10	\$22.77	POS	
Fox Park Neighborhood	11/18/10	\$10.00	1203	
Café Ventana	12/09/10	\$12.66	Check Card	

<b>Unreported Expenditures</b>				
<b>Expenditure</b>	<b>Date</b>	<b>Amount</b>	<b>Payment Type</b>	<b>Category of Expenditure or Notes</b>
Gelateria Tavolini	12/10/10	\$9.12	Check Card	
Walgreens	12/10/10	\$23.56	POS	
PNC Bank	12/13/10	\$2.00	Service Charge	
Gelateria Tavolini	12/13/10	\$5.33	Check Card	
Tar	12/13/10	\$97.61	POS	
PNC Bank	12/14/10	\$2.00	Service Charge	
1200 Market	12/14/10	\$41.75	ATM	
Studio Nails and Spa	12/15/10	\$25.00	Check Card	
Dave's BP	12/17/10	\$36.48	Check Card	
Schnuck's	12/17/10	\$49.10	POS	
PNC Bank	12/20/10	\$2.00	Service Charge	
Dtsdbadeal	12/20/10	\$6.51	POS	
Rue Lafayette	12/20/10	\$7.05	Check Card	
Rue Lafayette	12/20/10	\$9.49	Check Card	
Panera Bread	12/20/10	\$10.99	Check Card	
4901 Southwest	12/20/10	\$22.00	ATM	
ATTM	12/20/10	\$85.24	Check Card	
Gelateria Tavolini	12/22/10	\$2.47	Check Card	
Ocharley's	12/27/10	\$35.51	Check Card	
Jacqueline Phillips	12/19/10	\$100.00	1006	
PNC Bank	01/06/11	\$25.00	Service Charge	
PNC Bank	01/07/11	\$36.00	Service Charge	
Recurring Check Card Clear	01/13/11	\$45.42	ATM	Monthly Internet Fee
PNC Bank	01/14/11	\$36.00	Service Charge	
PNC Bank	01/18/11	\$36.00	Service Charge	
Rosalitas Cantina	01/18/11	\$73.60	Check Card	
PNC Bank	01/19/11	\$36.00	Service Charge	
PNC Bank	01/19/11	\$36.00	Service Charge	

Unreported Expenditures				
Expenditure	Date	Amount	Payment Type	Category of Expenditure or Notes
PNC Bank	01/19/11	\$36.00	Service Charge	
PNC Bank	01/19/11	\$36.00	Service Charge	
Park Avenue Coffee	01/20/11	\$5.50	Check Card	
Lafayette Square	12/13/10	\$10.00	1003	
Target	01/24/11	\$54.23	POS	
Gelateria Tavolini	01/31/11	\$3.68	Check Card	
Subway	01/31/11	\$7.67	Check Card	
China King Loughborough	01/31/11	\$12.46	Check Card	
Aldi	01/31/11	\$57.26	POS	
The Moog Center	01/31/11	\$100.00	Check Card	
PNC Bank	02/01/11	\$28.93	Service Charge	Service Charge
PNC Bank	02/04/11	\$36.00	Service Charge	Overdraft Fee
Recurring Check Card Clear	02/14/11	\$45.42	ATM	Monthly Internet Fee
Lucas Park Grille	02/17/11	\$39.72	Check Card	
Subway	02/18/11	\$17.53	Check Card	
Van Gogh's Martini Bar	02/18/11	\$35.29	Check Card	
Gelateria Tavolini	02/24/11	\$3.68	Check Card	
Gelateria Tavolini	02/28/11	\$11.16	Check Card	
Imos Pizza	02/28/11	\$11.23	Check Card	
Walgreens	02/28/11	\$13.21	POS	
Yummies	02/28/11	\$14.08	Check Card	
PNC Bank	03/01/11	\$6.00	Service Charge	Service Charge
Yummies	03/01/11	\$15.18	Check Card	
Rue Lafayette	03/02/11	\$19.69	Check Card	
QT	03/02/11	\$40.23	Check Card	
Subway	03/07/11	\$7.13	Check Card	
GRC	03/09/11	\$10.00	Check Card	
Exxonmobile	03/10/11	\$100.00	Check Card	
Recurring Check Card Clear	03/14/11	\$45.42	ATM	Monthly Internet Fee
Rosalitas Cantina	03/14/11	\$82.31	Check Card	

Unreported Expenditures				
Expenditure	Date	Amount	Payment Type	Category of Expenditure or Notes
PNC Bank	03/21/11	\$36.00	Service Charge	Overdraft
PNC Bank	03/21/11	\$36.00	Service Charge	Overdraft
PNC Bank	03/28/11	\$2.00	Service Charge	ATM Withdraw
Dollar-General	03/29/11	\$2.17	POS	
Hancock Fabrics	03/29/11	\$3.88	POS	
Hancock Fabrics	03/29/11	\$34.99	POS	
Missouri Department of Revenue	03/29/11	\$82.71	Check Card	
City of Brentwood Court	03/30/11	\$90.00	Check Card	
PNC Bank	04/01/11	\$1.16	Service Charge	Service Charge
Hancock Fabrics	04/01/11	\$22.29	POS	
PNC Bank	04/06/11	\$80.00	ATM	ATM Withdrawal
PNC Bank	04/12/11	\$100.00	ATM	ATM Withdrawal
Recurring Check Card Clear	04/13/11	\$45.42	ATM	Monthly Internet Fee
Gelateria Tavolini	04/14/11	\$3.90	Check Card	
Hancock Fabrics	04/19/11	\$7.14	POS	
Crown Food	04/21/11	\$50.18	POS	
Rue Lafayette	04/25/11	\$8.41	Check Card	
Gardenwalk Massage	04/25/11	\$85.00	Check Card	
Exxonmobile	04/26/11	\$1.40	POS	
USPS	04/26/11	\$5.95	POS	
Gelateria Tavolini	04/27/11	\$3.24	Check Card	
Recurring Check Card Clear	05/13/11	\$45.42	ATM	Monthly Internet Fee
Recurring Check Card Clear	06/13/11	\$45.42	ATM	Monthly Internet Fee
Gelateria Tavolini	06/15/11	\$2.47	Check Card	
Shi Salon	06/17/11	\$15.00	Check Card	
PNC Bank	07/01/11	\$0.03	Service Charge	Service Charge

Unreported Expenditures				
Expenditure	Date	Amount	Payment Type	Category of Expenditure or Notes
St. Wenceslaus Catholic Church	10/25/10	\$20.00	1195	Note: Ad Book Purchase
PNC Bank	01/03/12	\$18.00	Service Charge	
Subway	01/05/12	\$6.65	Check Card	
Walter Knoll Florist	01/10/12	\$66.24	Check Card	
Clear	01/13/12	\$45.42	Check Card	
Office Max	01/25/12	\$5.42	Check Card	
Left Bank Books	02/13/12	\$43.80	Check Card	
Recurring Check Card Clear	02/13/12	\$45.42	ATM	Monthly Internet Fee
Culinaria Schnuck's	02/14/12	\$15.79	Check Card	
Sheena Houston	12/29/11	\$50.00	1031	Note: Love Token
Nordstrom Rack	02/16/12	\$62.82	Check Card	
Ryan Image Consulting	02/18/12	\$85.00	1032	Note: Consulting
Nordstrom Rack	02/27/12	\$80.84	Check Card	
Airam Exterprise	03/12/12	\$51.75	Check Card	
Recurring Check Card Clear	03/13/12	\$45.42	ATM	Monthly Internet Fee
Nordstrom Rack	03/16/12	\$32.77	Check Card	
Ref*Pborb	03/20/12	\$6.99	Check Card	
Exxonmobile	03/21/12	\$25.96	Check Card	
Gogoair.com	03/22/12	\$4.95	Check Card	
Gamma Omega Inc.	03/07/12	\$100.00	1034	Note: Advertisement India
MPC 44	03/26/12	\$40.71	Check Card	
PNC Bank	03/27/12	\$2.50	Service Charge	ATM Fee
Park Avenue Coffee	03/27/12	\$5.22	Check Card	
PNC Bank	03/27/12	\$43.00	ATM	ATM Withdrawal
La Loma Mexican Restaurant	03/28/12	\$26.60	Check Card	
The Ink Spot Inc.	03/28/12	\$97.64	Check Card	
Starbucks	03/29/12	\$5.02	Check Card	



Unreported Expenditures				
Expenditure	Date	Amount	Payment Type	Category of Expenditure or Notes
Teclay Taxi	03/30/12	\$9.25	Check Card	
Matchbox	03/30/12	\$39.55	Check Card	
Mayorga Coffee Term B	04/02/12	\$3.37	Check Card	
Subway	04/02/12	\$4.64	Check Card	
Sq Danel Takele	04/02/12	\$14.25	Check Card	
Recurring Check Card Clear	04/13/12	\$45.42	ATM	Monthly Internet Fee
Café Ventana	04/20/12	\$4.32	Check Card	
PNC Bank	04/23/12	\$1.48	Service Charge	International POS Fee
Amageroebrobilen Taxi	04/23/12	\$49.44	Check Card	
PNC Bank	04/26/12	\$1.23	Service Charge	International POS Fee
World of Delights	04/26/12	\$40.91	Check Card	
PNC Bank	04/27/12	\$1.58	Service Charge	International POS Fee
PNC Bank	04/27/12	\$22.60	Service Charge	International POS Fee
Taxinord	04/27/12	\$52.61	Check Card	
Denny's	06/01/12	\$12.77	Check Card	
Frazer's	06/07/12	\$31.60	Check Card	
MPC 44	06/08/12	\$15.24	POS	
Crown Food	06/11/12	\$25.36	POS	
Club Fitness	06/11/12	\$40.59	Check Card	
Shi Salon	06/13/12	\$30.00	Check Card	
Golden Pancake	06/14/12	\$20.51	Check Card	
PNC Bank	06/18/12	\$1.50	Service Charge	Counter Check Fee
Kacie Triplett	07/11/12	\$100.00	Other	Withdrawal
Recurring Check Card Clear	07/16/12	\$45.42	ATM	Monthly Internet Fee
PNC Bank	07/17/12	\$36.00	Service Charge	Overdraft Fee
PNC Bank	07/23/12	\$21.00	Service Charge	Continuous OD Charge - 03 Days
PNC Bank	07/24/12	\$7.00	Service Charge	Continuous OD Charge - 01 Day

<b>Unreported Expenditures</b>				
<b>Expenditure</b>	<b>Date</b>	<b>Amount</b>	<b>Payment Type</b>	<b>Category of Expenditure or Notes</b>
PNC Bank	07/25/12	\$7.00	Service Charge	Continuous OD Charge - 01 Day
PNC Bank	07/26/12	\$7.00	Service Charge	Continuous OD Charge - 01 Day
PNC Bank	07/27/12	\$7.00	Service Charge	Continuous OD Charge - 01 Day
PNC Bank	07/30/12	\$21.00	Service Charge	Continuous OD Charge - 01 Day
PNC Bank	07/31/12	\$7.00	Service Charge	Continuous OD Charge - 03 Days
		<b>\$7,364.81</b>		

24. Respondents inaccurately reported the following expenditures by reporting a name different from the actual payee. In the alternative, Respondents either failed to report these expenditures or made these expenditures through an account other than Respondents' official depository account:

<b>Report Name</b>	<b>Reported Name</b>	<b>Actual Name</b>	<b>Date</b>	<b>Amount Reported</b>	<b>Reported Purpose</b>
October 2010 Quarterly	Best Buy	Mortgage Payment	8/30/2010	\$1,158.05	Equipment
Amended 40 Day Before Special Charter Election- 3/8/2011	CSS Direct	Statewide Info Systems	12/28/2010	\$270.00	Phones
<b>TOTAL</b>				<b>\$1,428.05</b>	

25. Respondents inaccurately reported the following expenditures by reporting an amount different from the actual expenditure. In the alternative, Respondents either failed to report these expenditures or made these expenditures through an account other than Respondents' official depository account.

<b>Report Name</b>	<b>Name</b>	<b>Date</b>	<b>Purpose</b>	<b>Amount Reported</b>	<b>Amount Paid</b>
July 2010 Quarterly Report	Marriott Union Station	6/16/2010	Food	\$2,500.00	\$1,500.00
July 2010 Quarterly Report	Accurate Business Mailers	6/26/2010	Mailing	\$200.00	\$207.12
8 Day Before General Election- 4/5/2011	Ink Spot	3/7/2011	Printing	\$1,120.71	\$1,089.61

26. Respondents failed to file timely, accurate, and cumulative campaign finance reports with accurate money on hand by failing to timely report the following contributions made to other committees:

<b>Committee Name</b>	<b>Date</b>	<b>Amount</b>	<b>Check Number</b>
Joe Adams for Senate	10/18/10	\$50.00	1199
Friends of Antonio French	07/13/10	\$100.00	1249
Committee to Elect Reed	06/03/10	\$100.00	1193
Friends of Chuck Banks	06/25/10	\$200.00	PayPal
Friends of Michael T Pembleton Jr. - MS State Representative	06/24/11	\$20.00	PayPal
Committee to Elect Fred Wessels	06/18/10	\$100.00	1256
<b>TOTAL</b>		<b>\$570.00</b>	

27. Respondents failed to report the following expenditures and fees made from the committee's PayPal Account:

<b>Recipient Name</b>	<b>Date</b>	<b>Subject</b>	<b>Amount</b>
Faith Loud	04/07/10	Donation	\$65.00
Poetry Scores	06/13/10	Poetry Scored	\$70.00
Nala & Company	08/24/10	zarawigs.com online orders	\$550.00
Pamela Raymond	10/04/10	You've got money!	\$450.00
Stephen Bolen	12/03/10	You've got money!	\$214.93
Sparkman Publication	09/13/11		\$45.00
		<b>TOTAL</b>	<b>\$1,394.93</b>

28. Respondents failed to report expenditures for fees to PayPal from February 7, 2010 through December 12, 2011 for a total amount of \$417.59.

29. Respondents reported the following expenditures that were not identified in the official fund depository account, and that were not supported by accurate records:

<b>Report Name</b>	<b>Reported Recipient</b>	<b>Date</b>	<b>Reported Purpose</b>	<b>Amount</b>
April 2010 Quarterly	Patrick Jakopchek	02/18/10	Consulting	\$900.00
April 2010 Quarterly		03/31/10	J.U.I.C.E. Project	\$50.00
July 2010 Quarterly	AT&T	05/28/10	Wireless Services	\$436.90
July 2010 Quarterly	Patrick Jakopchek	06/15/10	Consulting	\$900.00
July 2010 Quarterly		06/24/10	Water/Beverages	\$50.83
July 2010 Quarterly	Accurate Business Mailers	06/24/10	Mailing	\$856.00
October 2010 Quarterly		09/30/10	Kinkos Printing	\$76.83
October 2010 Quarterly		09/30/10	Cricket Internet Wireless	\$84.40
October 2010 Quarterly		09/30/10	Catering	\$96.83
40 Day Before Special Charter Election-3/8/2011	AT&T	11/15/10	Phone Service	\$257.00

<b>Report Name</b>	<b>Reported Recipient</b>	<b>Date</b>	<b>Reported Purpose</b>	<b>Amount</b>
40 Day Before Special Charter Election-3/8/2011	AT&T	12/13/10	Phone Service	\$265.00
40 Day Before Special Charter Election-3/8/2011	Gamma Ray	12/17/10	Website	\$401.00
40 Day Before Special Charter Election-3/8/2011	St. Louis Bread Co.	12/28/10	Food	\$36.00
40 Day Before Special Charter Election-3/8/2011	Yummies	12/30/10	Food	\$100.00
40 Day Before Special Charter Election-3/8/2011	Office Max	01/03/11	Supplies	\$257.00
8 Day Before Special Charter Election-3/8/2011	Sarah Jane Hunt	02/05/11	Salary	\$500.00
8 Day Before Special Charter Election-3/8/2011	AT&T	02/07/11	Phones	\$156.00
8 Day Before Special Charter Election-3/8/2011	Lorna Brown	02/10/11	Salary	\$500.00
Amended 8 Day Before Special Charter Election-3/8/2011	Woodley Park Group	02/11/11	Campaign Worker	\$696.50
8 Day Before Special Charter Election-3/8/2011	AT&T	02/11/11	Phones	\$767.17
8 Day Before Special Charter Election-3/8/2011	USPS	02/14/11	Stamps	\$186.93
8 Day Before Special Charter Election-3/8/2011	Clear Communications	02/19/11	Internet	\$106.39
8 Day Before Special Charter Election-3/8/2011	Chris Cakes of St. Louis	02/19/11	Food	\$400.00
8 Day Before Special Charter Election-3/8/2011	Walgreens	02/23/11	Supplies	\$256.36

Report Name	Reported Recipient	Date	Reported Purpose	Amount
8 Day Before General Election-4/5/2011	Office Max	02/28/11	Supplies	\$150.36
8 Day Before General Election-4/5/2011	AT&T	03/01/11	Phones	\$250.00
8 Day Before General Election-4/5/2011		03/24/11	Clear Spot Communications	\$89.15
January 2012 Quarterly	Clear Spot	12/12/11	Internet Services	\$136.26
January 2012 Quarterly	AT&T	12/15/11	Phone Service	\$186.54
				<b>\$9,149.45</b>

### COUNT V

*Violation of Missouri laws prohibiting cash expenditures greater than \$50*

30. Respondents made the following cash expenditures from the official fund depository that each exceeded fifty dollars:

Payment	Date on Bank Statement	Amount	Type of Payment	Purpose	Note on Check
Cash	07/06/10	\$100.00			Re-Imburse Jerome
Kacie Triplett	03/10/10	\$300.00	Other		
PNC Bank	03/28/11	\$101.95	ATM	ATM Withdrawal	
PNC Bank	03/29/11	\$200.00	ATM	ATM Withdrawal	
Cash	05/10/10	\$2,500.00	1191		Wish I could do more will try after my fundraiser
<b>TOTAL</b>		<b>\$3,201.95</b>			

## COUNT VI

*Failure to Transfer Funds From PayPal Account to Official Fund Depository Account and to*

*Pay all Expenditures from the Official Fund Depository*

31. Respondent Kacie Starr Triplett acted as an agent for her campaign committee by accepting contributions through a PayPal account in the name of Friends of Kacie Starr Triplett, but Respondent Kacie Starr Triplett failed to timely transfer these contributions within five days of receipt to the Official Fund Depository of Respondent Friends of Kacie Starr Triplett as follows:

Name	Date	Gross Amount	PayPal Fee	Contribution amount	Deposit into Official Fund Depository
Donna Hagerty-Payne	1/18/2010	\$500.00	(\$14.80)	\$485.20	
Norma Williams	2/7/2010	\$50.00	(\$1.75)	\$48.25	
Anthony Lancia - AGC of St. Louis	2/8/2010	\$25.00	(\$1.03)	\$23.97	
greg toumayan	2/10/2010	\$100.00	(\$3.20)	\$96.80	
Jordan Wildermuth	2/11/2010	\$25.00	(\$1.03)	\$23.97	
Barbara Boone	2/18/2010	\$50.00	(\$1.75)	\$48.25	
Sal Martinez	3/2/2010	\$100.00	(\$3.20)	\$96.80	
Brenda Mahr	5/27/2010	\$100.00	(\$3.20)	\$96.80	
Cindy Musterman	6/2/2010	\$350.00	(\$10.45)	\$339.55	
Cindy Musterman	6/2/2010	\$350.00	(\$10.45)	\$339.55	
Norma Williams	6/3/2010	\$50.00	(\$1.75)	\$48.25	
Benjamin McClellan	6/7/2010	\$50.00	(\$1.75)	\$48.25	
Christopher Hicks	6/7/2010	\$100.00	(\$3.20)	\$96.80	
Cinnomin Brothers	6/9/2010	\$25.00	(\$1.03)	\$23.97	
Charles Poiner	6/9/2010	\$50.00	(\$1.75)	\$48.25	
Maxine Johnson	6/10/2010	\$50.00	(\$1.75)	\$48.25	
Maxine Johnson	6/10/2010	\$50.00	(\$1.75)	\$48.25	

Name	Date	Gross Amount	PayPal Fee	Contribution amount	Deposit into Official Fund Depository
Forget-me-not Bed and Breakfast	6/11/2010	\$50.00	(\$1.75)	\$48.25	
Leah Garabedian	6/13/2010	\$50.00	(\$1.75)	\$48.25	
Leah Garabedian	6/13/2010	\$50.00	(\$1.75)	\$48.25	
Alison Gee	6/14/2010	\$100.00	(\$3.20)	\$96.80	
Barbara Boone	6/15/2010	\$250.00	(\$7.55)	\$242.45	
Belle Midwest Inc Michael Askuvich	6/16/2010	\$100.00	(\$3.20)	\$96.80	
Angela Postal	6/17/2010	\$100.00	(\$3.20)	\$96.80	
Sean Weller	6/18/2010	\$50.00	(\$1.75)	\$48.25	
Brandi Jones	6/18/2010	\$50.00	(\$1.75)	\$48.25	
Ebonee Shaw	6/18/2010	\$50.00	(\$1.75)	\$48.25	
WILLIAM SEATON	6/18/2010	\$50.00	(\$1.75)	\$48.25	
Jamala Rogers	6/18/2010	\$50.00	(\$1.75)	\$48.25	
Barbara Absher	6/18/2010	\$50.00	(\$1.75)	\$48.25	
St Louis Auto Lisa Renaud	6/18/2010	\$250.00	(\$7.55)	\$242.45	
Sybil Yates	6/19/2010	\$50.00	(\$1.75)	\$48.25	
Teri Pesapane	6/19/2010	\$50.00	(\$1.75)	\$48.25	
Teri Pesapane	6/19/2010	\$50.00	(\$1.75)	\$48.25	
Bruce Kraemer	6/19/2010	\$250.00	(\$7.55)	\$242.45	
Bruce Kraemer	6/19/2010	\$250.00	(\$7.55)	\$242.45	
Michael Kennedy	6/22/2010	\$325.00	(\$9.73)	\$315.27	
Jamala Rogers	6/23/2010	\$50.00	(\$1.75)	\$48.25	
Ebonee Shaw	6/24/2010	\$90.00	(\$2.91)	\$87.09	
Sal Martinez	7/7/2010	\$200.00	(\$6.10)	\$193.90	
RDR314	7/29/2010	\$50.00	(\$1.75)	\$48.25	
TIRE MART, INC.	8/24/2010	\$500.00	(\$14.80)	\$485.20	
Michael Malone	11/29/2010	\$100.00	(\$3.20)	\$96.80	
Richard Daniels	12/2/2010	\$500.00	(\$14.80)	\$485.20	
Cindy Musterman	12/2/2010	\$500.00	(\$14.80)	\$485.20	
<b>TOTAL</b>				<b>\$6,045.52</b>	
<b>DEPOSIT</b>	12/13/2010				\$3,000.00
Joshua Stevens	1/9/2011	\$100.00	(\$3.20)	\$96.80	



Name	Date	Gross Amount	PayPal Fee	Contribution amount	Deposit into Official Fund Depository
Melanie Knies	1/13/2011	\$50.00	(\$1.75)	\$48.25	
Stephen Laffoon	1/16/2011	\$50.00	(\$1.75)	\$48.25	
Juanita Green	1/22/2011	\$25.00	(\$1.03)	\$23.97	
<b>TOTAL</b>				<b>\$217.27</b>	
<b>DEPOSIT</b>	2/4/2011				\$1,229.48
Christine Marx	2/9/2011	\$10.00	(\$0.59)	\$9.41	
Denise Peoples	2/9/2011	\$30.00	(\$1.17)	\$28.83	
April Turner	2/9/2011	\$30.00	(\$1.17)	\$28.83	
Mataryun Wright	2/9/2011	\$30.00	(\$1.17)	\$28.83	
Brian Ward	2/9/2011	\$30.00	(\$1.17)	\$28.83	
Sarah Beaman-Jones	2/9/2011	\$30.00	(\$1.17)	\$28.83	
Tameaa Turner	2/9/2011	\$30.00	(\$1.17)	\$28.83	
Philip Deitch	2/9/2011	\$30.00	(\$1.17)	\$28.83	
Joan Suarez	2/9/2011	\$50.00	(\$1.75)	\$48.25	
Tuxedo Park Management, LLC	2/9/2011	\$50.00	(\$1.75)	\$48.25	
Sal Martinez	2/9/2011	\$50.00	(\$1.75)	\$48.25	
Cynthia Musterman	2/9/2011	\$100.00	(\$3.20)	\$96.80	
Anton Krawat	2/9/2011	\$100.00	(\$3.20)	\$96.80	
Marvin Sowers	2/9/2011	\$100.00	(\$3.20)	\$96.80	
Charles Gascon	2/9/2011	\$100.00	(\$3.20)	\$96.80	
Paula Gianino	2/9/2011	\$100.00	(\$3.20)	\$96.80	
Richard Gray	2/9/2011	\$250.00	(\$7.55)	\$242.45	
Alicia McDonald	2/9/2011	\$300.00	(\$9.00)	\$291.00	
Arthur Wilhelm	2/11/2011	\$100.00	(\$3.20)	\$96.80	
Tracy Sherman	2/14/2011	\$30.00	(\$1.17)	\$28.83	
Charlie Hoffman	2/15/2011	\$50.00	(\$1.75)	\$48.25	
Friends and supporters of Alisha Thomas Morgan	2/16/2011	\$100.00	(\$3.20)	\$96.80	
Brookeshanna Hart	2/17/2011	\$50.00	(\$1.75)	\$48.25	
Charlie Hoffman	2/18/2011	\$50.00	(\$1.75)	\$48.25	
<b>TOTAL</b>				<b>\$1,740.60</b>	
<b>DEPOSIT</b>	3/1/2011				\$1,769.12
George Robnett	3/8/2011	\$25.00	(\$1.03)	\$23.97	

<b>Name</b>	<b>Date</b>	<b>Gross Amount</b>	<b>PayPal Fee</b>	<b>Contribution amount</b>	<b>Deposit into Official Fund Depository</b>
Brian Ward	11/29/2011	\$50.00	(\$1.75)	\$48.25	
Martin Rafanan	12/5/2011	\$25.00	(\$1.03)	\$23.97	
Pat Giacin	12/8/2011	\$25.00	(\$1.03)	\$23.97	
Cindy Musterman	12/8/2011	\$500.00	(\$14.80)	\$485.20	
Richard Wachel	12/12/2011	\$100.00	(\$3.20)	\$96.80	
<b>TOTAL</b>				<b>\$702.16</b>	
<b>DEPOSIT</b>	1/11/2012				\$905.50
		<b>\$8,990.00</b>	<b>(\$284.45)</b>	<b>\$8,705.55</b>	<b>\$6,904.10</b>

32. Respondents paid the following expenditures directly from PayPal Account,

Friends of Kacie Triplett as follows:

<b>Date</b>	<b>Name</b>	<b>Type</b>	<b>Subject</b>	<b>Amount</b>
04/07/10	Faith Aloud	Donation Sent	Faith Aloud	\$65.00
06/13/10	Poetry Scores	Donation Sent	Poetry Scores	\$70.00
06/25/10	Friends of Chuck Banks	Donation Sent	Friends of Chuck Banks	\$200.00
08/24/10	Nala & Company	Web Accept Payment Sent	zarawigs.com online orders	\$550.00
10/04/10	Pamela Raymond	Payment Sent	You've got money!	\$450.00
11/16/10	Pamela Raymond	Payment Sent	You've got money!	\$300.00
12/01/10	Pamela Raymond	Payment Sent	You've got money!	\$300.00
12/03/10	Stephen Bolen	Payment Sent	You've got money!	\$214.93
01/28/11	Stephen Bolen	Payment Sent	PayPal money request from Stephen Bolen	\$200.94
06/24/11	Friends of Michael T. Pembleton Jr.-MS State Representative	Donation Sent	Campaign 2011	\$20.00
09/13/11	Sparkman Publication	Invoice Received		\$45.00
				<b>\$2,415.87</b>

## **COUNT VII**

### *Improper Filing of Statements of Limited Activity*

33. Respondents improperly filed a Statement of Limited Activity for the July 2011 Quarter when the committee received contributions totaling \$472.00 and made expenditures totaling \$481.25 thus meeting the levels requiring the filing of a full disclosure report for that period.

34. Respondents improperly filed a Statement of Limited Activity for the April 2012 Quarter when the committee received contributions totaling \$2,005.41 and made expenditures totaling \$5,984.57 thus meeting the levels requiring the filing of a full disclosure report for that period.

## **COUNT VIII**

### *Failure to Report Changes in the Official Fund Depository Account and Failure to either Maintain an Official Fund Depository Account or Terminate Committee*

35. On September 9, 2011, Respondents filed an amended statement of committee organization stating that the committee would support Respondent Triplett as a candidate for alderman in the March 3, 2015 municipal election.

36. In July 2012, the official fund depository account was closed due to a negative fund balance.

37. Respondents failed to report outstanding indebtedness on the 30 Day After the April 5, 2011 Election or on any subsequent report.

38. Respondents failed to report any change in the committee's official fund depository accounts, and the change of the committee as reflected on the official fund depository account.

39. Respondents did not open a new official fund depository account and Respondents failed to terminate the Respondent committee when the Respondents failed to maintain an official fund depository in July 2012.

### **COUNT IX**

#### *Failure to maintain committee records*

40. In response to the Ethics Commission request and subpoena, Respondents failed to provide committee records that were necessary to document and support the expenditure of committee funds and/or that were necessary to document and support the campaign finance reports filed by the committee as provided in this complaint.

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

### **COUNT I**

#### *Unauthorized Use of Committee Funds*

41. §130.034.2, RSMo provides for the allowable uses of campaign finance committee funds.

42. Contributions made to a committee “shall not be converted to any personal use.” §130.034.1, RSMo.

43. §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.

44. “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 and 8, RSMo

45. There is probable cause to believe that Respondents Kacie Starr Triplett and Friends of Kacie Starr Triplett violated §130.034 and §130.036, RSMo, by failing to use committee funds for any allowable purpose and/or converting committee funds to personal use, and by failing to maintain records to justify the allowable use of contributions as detailed in this count, and that Respondents did so knowingly.

## **COUNT II**

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

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

47. §130.041.1(2), RSMo, required Respondents to report the amount of money on hand, including cash on hand at the beginning of each reporting period.

48. "Each report by such committee shall be cumulative from the date of the last report." §130.046.3, RSMo,

49. 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.

50. There is probable cause to believe that Respondents Kacie Starr Triplett and Friends of Kacie Starr Triplett violated §130.021.2, §130.021.4(1), §130.041.1(2), §130.046.3, and §130.041.1(3), RSMo by failing to timely and accurately report contributions and receipts received by the committee and therefore failing to timely and accurately report the money on hand in cumulative reports and that Respondents did so knowingly.

### **COUNT III**

*Violation of Missouri laws prohibiting the acceptance of anonymous and cash contributions in excess of allowable limits without filing of a fundraising statement to support those contributions*

51. “No contribution of cash in an amount of more than one hundred dollars shall be made by or accepted from any single contributor for any election by a continuing committee, a

campaign committee, a political party committee, an exploratory committee or a candidate committee.” §130.031.1, RSMo.

52. “No anonymous contribution of more than twenty-five dollars shall be made by any person, and no anonymous contribution of more than twenty-five dollars shall be accepted by any candidate or committee.” §130.031.4, RSMo.

53. “Notwithstanding the provisions of subsection 5 of this section, contributions from individuals whose names and addresses cannot be ascertained which are received from a fund-raising activity or event, such as defined in section 130.011, shall not be deemed anonymous contributions, provided the following conditions are met:

- (1) There are twenty-five or more contributing participants in the activity or event;
- (2) The candidate, committee treasurer, deputy treasurer or the person responsible for conducting the activity or event makes an announcement that it is illegal for anyone to make or receive a contribution in excess of one hundred dollars unless the contribution is accompanied by the name and address of the contributor;
- (3) The person responsible for conducting the activity or event does not knowingly accept payment from any single person of more than one hundred dollars unless the name and address of the person making such payment is obtained and recorded pursuant to the record-keeping requirements of section 130.036;

(4) A statement describing the event shall be prepared by the candidate or the treasurer of the committee for whom the funds were raised or by the person responsible for conducting the activity or event and attached to the disclosure report of contributions and expenditures required by section 130.041. The following information to be listed in the statement is in addition to, not in lieu of, the requirements elsewhere in this chapter relating to the recording and reporting of contributions and expenditures:

(a) The name and mailing address of the person or persons responsible for conducting the event or activity and the name and address of the candidate or committee for whom the funds were raised;

(b) The date on which the event occurred;

(c) The name and address of the location where the event occurred and the approximate number of participants in the event;

(d) A brief description of the type of event and the fund-raising methods used;

(e) The gross receipts from the event and a listing of the expenditures incident to the event;

(f) The total dollar amount of contributions received from the event from participants whose names and addresses were not obtained with such contributions and an explanation of why it was not possible to obtain the names and addresses of such participants;



(g) The total dollar amount of contributions received from contributing participants in the event who are identified by name and address in the records required to be maintained pursuant to section 130.036.

§130.031.6, RSMo.

54. There is probable cause to believe that Respondents Kacie Starr Triplett and Friends of Kacie Starr Triplett violated by §130.031.1, §130.031.4, and §130.031.6, RSMo by receiving cash contributions above the statutory limit from a single contributor, by failing to maintain adequate committee records to support the receipt of the cash contributions, and by failing to file fundraising statements with the April 2010 and July 2010 Quarterly Reports and that Respondents did so knowingly.

#### **COUNT IV**

##### *Failure to timely and accurately report expenditures and contributions made to committees*

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

(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. §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 Kacie Starr Triplett and Friends of Kacie Starr Triplett violated §130.041.1(4) and §130.041.1(8), RSMo by failing to timely and accurately report expenditures, contributions made and fees, paid by the committee and therefore failing to timely and accurately report the money on hand in cumulative reports and that Respondents did so knowingly.

#### COUNT V

##### *Violation of Missouri laws prohibiting cash expenditures greater than \$50*

58. “[E]ach expenditure of more than fifty dollars, except an in-kind expenditure, shall be made by check drawn on the committee's depository and signed by the committee treasurer, deputy treasurer or candidate.” §130.031.2, RSMo.

59. “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.” §130.031.2, RSMo.

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

61. There is probable cause to believe that Respondents Kacie Starr Triplett and Friends of Kacie Starr Triplett violated §130.031.2, RSMo, by making cash expenditures, that exceeded \$50 each, and that Respondents Kacie Starr Triplett and Friends of Kacie Starr Triplett did so knowingly.

#### **COUNT VI**

##### *Failure to Transfer Funds From PayPal Account to Official Fund Depository Account and to Pay all Expenditures from the Official Fund Depository*

62. “All contributions which the committee receives in money, checks and other negotiable instruments shall be deposited in a committee's official depository account. Contributions shall not be accepted and expenditures shall not be made by a committee except by or through an official depository account and the committee treasurer, deputy treasurer or candidate. 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.” §130.021.4(1), RSMo.

63. Notwithstanding the provisions of subsection 4 of section 130.021 prohibiting commingling of funds, an individual, trade or professional association, business entity, or labor organization which acts as an agent for a committee in receiving contributions may deposit contributions received on behalf of the committee to the agent's account within a financial institution within this state, for purposes of facilitating transmittal of the contributions to the candidate, committee treasurer or deputy treasurer. Such contributions shall not be held in the agent's account for more than five days after the date the contribution was received by the agent, and shall not be transferred to the account of any other agent or person, other than the committee treasurer. §130.036.1, RSMo.

64. There is probable cause to believe that Respondents Kacie Starr Triplett and Friends of Kacie Starr Triplett violated §130.021.4(1) and §130.036.1, RSMo, by failing to transfer within five days of receipt contributions from Respondent Kacie Starr Triplett's PayPal account to Respondent Friends of Kacie Starr Triplett's official fund depository account, and by failing to pay expenditures from the official fund depository, and that Respondents Kacie Starr Triplett and Friends of Kacie Starr Triplett did so knowingly.

## **COUNT VII**

### *Improper Filing of Statements of Limited Activity*

65. According to §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

expenditures 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...

66. There is probable cause to believe that Respondents Kacie Starr Triplett and Friends of Kacie Starr Triplett violated §130.046.5(2), RSMo, by filing two statements of limited activity, including the July 2011 and the April 2012 Quarters, when the committee received contributions and made expenditures over the statutory requirement authorized for filing statements of limited activity, and that Respondents did so knowingly.

#### COUNT VIII

*Failure to Report Changes in the Official Fund Depository Account and Failure to either Maintain an Official Fund Depository Account or Terminate Committee*

67. §130.011(9), RSMo defines a "Candidate committee" as "a committee which shall be formed by a candidate to receive contributions or make expenditures in behalf of the person's candidacy and which shall continue in existence for use by an elected candidate or

which shall terminate the later of either thirty days after the general election for a candidate who was not elected or upon the satisfaction of all committee debt after the election,”

68. 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

69. §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.

70. Upon termination of a committee, a termination statement indicating dissolution shall be filed not later than ten days after the date of dissolution with the appropriate officer or officers with whom the committee's statement of organization was filed. The termination statement shall include: the distribution made of any remaining surplus funds and the disposition of any deficits; and the name, mailing address and telephone number of the individual responsible for preserving the committee's records and accounts as required in §130.036. §130.021.8, RSMo.

71. There is probable cause to believe that Respondents Kacie Starr Triplett and Friends of Kacie Starr Triplett violated §130.021.4(1), §130.021.7, and §130.021.8, RSMo by failing to utilize an official fund depository account which qualified as a negotiable draft or negotiable order of withdrawal account after July 2012, and by failing to report changes in the official fund depository account in July 2012, and that Respondents did so knowingly.

## **COUNT IX**

### *Failure to maintain committee records*

72. §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. "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 and 8, RSMo

73. There is probable cause to believe that Respondents violated §130.036, RSMo by failing to maintain accurate records of each contribution and expenditure made for three years after the date of the report 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. The Commission orders Respondents Triplett and Friends of Kacie Starr Triplett to file accurately all necessary campaign finance reports and statements, including but not limited to reports from January 2010 through termination of the committee, as appropriate within six months of the date of the order.

c. It is the further order of the Missouri Ethics Commission that a fee is imposed against Respondents Triplett and Friends of Kacie Starr Triplett in the amount of \$100,000.00 pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$10,000.00 of that fee within 45 days after the date of the Order, and file all necessary reports and terminate the Respondent Committee within six calendar months of the date of this order, the remainder of the fee will be stayed, subject to the provisions



below. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.

d.If either Respondent Triplett or Friends of Kacie Starr Triplett commits any further violations of the campaign finance laws under Chapter 130, RSMo, within the two year period from the date of this order, Respondents will be required to pay the remainder of the fee. The fee will be due immediately upon final adjudication finding that Respondents committed such a violation.

3. The parties, their official representatives and officers 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, and based upon the future filing of required reports and the termination of Respondent Committee within timely compliance of this agreement.

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.

RESPONDENT KACIE STARR TRIPLETT

By: Kacie Starr Triplett 2/25/14  
Kacie Starr Triplett Date

By: Kevin Gunn 2/25/14  
Kevin Gunn Date  
Attorney for Respondent Triplett

PETITIONER MISSOURI ETHICS  
COMMISSION

By: James Klahr 2/26/14  
James Klahr Date  
Executive Director

By: Elizabeth L. Ziegler 2/26/14  
Elizabeth L. Ziegler Date  
Attorney for Petitioner

RESPONDENT FRIENDS OF KACIE  
STARR TRIPLETT

By: Kacie Starr Triplett 2/25/14  
Friends of Kacie Starr Triplett Date

By: Kevin Gunn 2/25/14  
Kevin Gunn  
Attorney for Friends of Kacie Starr Triplett

**Filed**  
**FEB 26 2014**  
Missouri Ethics  
Commission

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	
	)	
KACIE STARR TRIPLETT	)	Case No. 13A115
	)	
and	)	
	)	
FRIENDS OF KACIE STARR TRIPLETT	)	
	)	
Respondents.	)	

**CONSENT ORDER**

The parties having filed a Joint Stipulation of Facts, Waiver of Hearing before the Missouri Ethics Commission, and Consent Order with Proposed Findings of Fact and Conclusions of Law ("Joint Stipulation") with the Missouri Ethics Commission in this matter, the Missouri Ethics Commission hereby accepts as true the facts stipulated and finds that Respondents Kacie Starr Triplett and Friends of Kacie Starr Triplett violated Sections 130.034, 130.036, 130.021.2, 130.021.4(1), 130.041.1(2), 130.046.3, 130.041.1(3), 130.031.1, 130.031.4, 130.031.6, 130.041.1(4), 130.041.1(8), 130.031.2, 130.036.1, 130.046.5(2), 130.021.7, 130.021.8, RSMo, as stated in the Joint Stipulation.

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

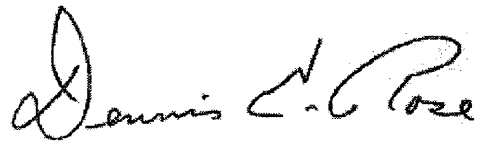
1. Respondents shall comply with all relevant sections of Chapter 130, RSMo.
2. The Commission orders Respondents Triplett and Friends of Kacie Starr Triplett to file accurately all necessary campaign finance reports and statements, including but

not limited to reports from January 2010 through termination of the committee, as appropriate within six months of the date of the order.

3. It is the further order of the Missouri Ethics Commission that a fee is imposed against Respondents Triplett and Friends of Kacie Starr Triplett in the amount of \$100,000 pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$10,000 of that fee within forty-five (45) days after the date of this Order, and files all necessary reports and terminates the Respondent Committee within six calendar months of the date of this order, the remainder of the fee will be stayed, subject to the provisions below. The fee will be paid by check or money order made payable to the Missouri Ethics Commission and sent to the Missouri Ethics Commission.
4. If either Respondent Triplett or Friends of Kacie Starr Triplett commits any further violations of the campaign finance laws pursuant to Chapter 130, RSMo, as amended, within the two year period from the date of this order, Respondents will be required to pay the remainder of the fee. The fee will be due immediately upon final adjudication finding that Respondents committed such a violation.

SO ORDERED this 26<sup>th</sup> day of February,  
2014

By:

A handwritten signature in black ink, appearing to read "Dennis Rose", written over a horizontal line.

Dennis Rose, Chair  
Missouri Ethics Commission