

BEFORE THE  
MISSOURI ETHICS COMMISSION

**Filed**  
**APR - 1 2011**  
Missouri Ethics  
Commission

MISSOURI ETHICS COMMISSION )  
)  
Petitioner, )  
v. )  
)  
SHARON SANDERS BROOKS, Candidate ) No. 10E049  
)  
and )  
)  
SHARON SANDERS BROOKS FOR A )  
NEW THIRD DISTRICT, Committee )  
)  
Respondents. )

**CONSENT ORDER**

The parties having filed a Joint Stipulation of Facts, Waiver of Hearings 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 the Respondents Sharon Sanders Brooks and Sharon Sanders Brooks for a New Third District have violated §130.046.1, RSMo, as stated in the Joint Stipulation.

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

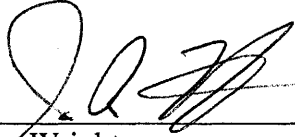
a. Respondent agrees that they will comply with all relevant sections of Chapter 130, RSMo.

b. It is the order of the Missouri Ethics Commission that a fee is imposed against the Respondents Sharon Sanders Brooks and Sharon Sanders Brooks for a New Third District Committee in the amount of \$1,000.00 pursuant to §105.961.4(6) RSMo.

However, if Respondents pay \$100.00 of that fee after the date of the Order, the remainder of the fee will be stayed for two years, 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.

c. If Respondents Sharon Sanders Brooks and Sharon Sanders Brooks for a New Third District Committee have not committed any further violations of the campaign finance disclosure laws pursuant to Chapter 130, RSMo., during the two year stay, then the Respondents will not be required to pay the remainder of the fee. If, however, either Respondent is found to have violated the campaign finance laws pursuant to Chapter 130, RSMo. 2000, during this two year stay, Respondents will be required to pay the remainder of the fee as originally imposed by the Commission. The fee will be due immediately upon final adjudication finding Respondents guilty of such a violation.

SO ORDERED this 1<sup>st</sup> day of April, 2011.

By:   
\_\_\_\_\_  
Jim Wright

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SHARON SANDERS BROOKS FOR A	)	
NEW THIRD DISTRICT, Committee	)	
	)	
Respondents.	)	

**JOINT STIPULATION OF FACTS, WAIVER OF HEARINGS 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, Sharon Sanders Brooks and Sharon Sanders Brooks for a New Third District Committee, 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 proven upon the record by competent and substantial evidence; the right to cross-examine any witness appearing at the hearing against Respondents; the right to present evidence on Respondents' own behalf at the hearing; and the right to a decision upon the record of

the hearing. Being aware of these rights provided to the 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 Hearings 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 FINDINGS OF FACT**

1. The Missouri Ethics Commission (“the Commission”) is an agency of the State of Missouri established pursuant to §105.955, RSMo, in part for the purpose of enforcing the provisions of Chapter 130, RSMo.
2. On January 13, 2011, an amended Statement of Committee Organization was filed for Respondent, Sharon Sanders Brooks for a New Third District (“Committee”), as a Candidate Committee.
3. Respondent Committee was amended in support of Respondent Sharon Sanders Brooks for Council for Kansas City Third District in the February 22, 2011 Primary Election.
4. Pursuant to §130.058, RSMo the candidate is ultimately responsible for all reporting requirements pursuant to this chapter.

5. Pursuant to §130.026, RSMo, Petitioner and the Kansas City Board of Election Commissioners are the appropriate officers designated to receive the statement of committee organization and campaign finance reports for Committee.

6. Respondents failed to file an October 2009 Quarterly report on November 12, 2009, and a January 2010 and April 2010 Quarterly Disclosure Report on April 21, 2010.

7. On January 18, 2011, Respondents filed amended January, July and October 2010 Quarterly Disclosure Reports, reporting aggregate contributions, and full contribution date, address and employer information for contributors.

8. On April 8, 2010, Petitioner received a complaint filed against Respondents alleging that Respondents has filed a late October 2009 Quarterly Report, and failed to file a January 2010 report disclosing contributions and expenditures.

9. Pursuant to §105.961.1, RSMo, following the receipt of the complaint, a special investigator has conducted an investigation and reported findings to the Commission.

### **JOINT CONCLUSIONS OF LAW**

1. According to §130.046.1, RSMo:

The disclosure reports required by section 130.041 for all committees shall be filed at the following times and for the following periods:

...

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

2. There is probable cause that Respondents have violated §130.046.1, RSMo by failing to file timely the October 2009, and January and April 2010 Quarterly

Disclosure Reports fully reporting all contributions and expenditures, 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 agree that they will 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 the Respondents Sharon Sanders Brooks and Sharon Sanders Brooks for a New Third District Committee in the amount of \$1,000.00 pursuant to §105.961.4(6) RSMo. However, if Respondents pay \$100.00 of that fee after the date of the Order, the remainder of the fee will be stayed for two years, 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.

c. If Respondents Sharon Sanders Brooks and Sharon Sanders Brooks for a New Third District Committee have not committed any further violations of the campaign finance disclosure laws pursuant to Chapter 130, RSMo., during the two year stay, then the Respondents will not be required to pay the remainder of the fee. If, however, either Respondent is found to have violated the campaign finance laws pursuant to Chapter 130, RSMo. 2000, during this two year stay, Respondents will be required to pay the remainder of the fee as originally imposed by the Commission. The fee will be due immediately upon final adjudication finding Respondents guilty of such a violation.

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

4. Respondents, together with their heirs, successors and assigns, do hereby waive, release, acquit and forever discharge the Missouri Ethics Commission and its attorney 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 and their attorney now have or which they may hereafter have, which is based upon or arises out of the above case.

RESPONDENT

By: Sharon Sanders Brooks  
Sharon Sanders Brooks Date 3/19/11  
Sharon Sanders Brooks for a New  
Third District Committee

PETITIONER

By: Julie A. Allen 4/1/11  
Julie A. Allen Date  
By: Elizabeth L. Ziegler 4/1/11  
Elizabeth L. Ziegler Date  
General Counsel  
Missouri Ethics Commission