

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,	)	
	)	
3411-A Knipp Drive	)	
Jefferson City, MO 65109	)	
	)	
Petitioner,	)	
	)	Case No. 16-0004-A
v.	)	
	)	
CHRISTINE INGRASSIA,	)	
	)	
and	)	
	)	
FRIENDS OF CHRISTINE INGRASSIA,	)	
	)	
Respondents.	)	

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

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

The undersigned Respondents, Christine Ingrassia and Friends of Christine Ingrassia, 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 allegations against Respondents be proven upon the record by competent and substantial evidence; the right to cross-examine any witnesses appearing at the hearing against Respondents; the right to present evidence on Respondents'

behalf at the hearing; and the right to a decision upon the record of the hearing. Being aware of these rights provided to Respondents by operation of law, the undersigned Respondents knowingly and voluntarily waive each and every one of these rights and freely enter into this Joint Stipulation of Facts, Waiver of Hearing before the Missouri Ethics Commission, and Consent Order with Joint Proposed Findings of Fact and Conclusions of Law, and agree to abide by the terms of this document.

**I.**

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

**JOINT PROPOSED FINDINGS OF FACT**

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

2. Respondent Christine Ingrassia was a successful candidate for the St. Louis City 6<sup>th</sup> Ward Alderman in March 2013 and again in March 2015.

3. Respondent Ingrassia has indicated on her Statement of Committee Organization, that she plans to run for the St. Louis City 6<sup>th</sup> Ward Alderman in March 2019.

4. Respondent Friends of Christine Ingrassia is and was at all relevant times the candidate committee formed by Respondent Ingrassia to support her Alderman candidacy in the 2013 general election and subsequent elections.

5. Respondent Christine Ingrassia was the named treasurer of Friends of Christine Ingrassia committee from January 15, 2014 to present.

6. Pursuant to Section 105.959, RSMo, the Commission's staff has audited the reports and statements filed with the Commission and reported the investigation's findings to the Commission.

7. Based on the report of the Commission's staff, the Commission determined that there are 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**

*Cash expenditures in excess of allowed limits*

8. Respondents made eight cash expenditures, each in excess of \$50.00, and totaling \$815.00:

<b>CASH EXPENDITURES</b>			
<b>Date</b>	<b>Type</b>	<b>Payee</b>	<b>Amount</b>
7/15/2013	ATM Withdrawal	Cash	\$100.00
12/17/2013	ATM Withdrawal	Cash	\$100.00
12/17/2013	ATM Withdrawal	Cash	\$100.00
4/18/2014	ATM Withdrawal	Cash	\$200.00
Unknown	ATM Withdrawal	Cash	\$100.00
7/15/2015	ATM Withdrawal	Cash	\$60.00
7/15/2015	Cash Withdrawal	Cash	\$90.00
7/15/2015	Cash Withdrawal	Cash	\$65.00

**COUNT II**

*Failure to timely file campaign finance disclosure reports and notices*

9. Respondents failed to timely file ten reports and one Limited Activity Statement:

<b>FAILURE TO TIMELY FILE REPORTS &amp; NOTICES</b>		
<b>Report Name</b>	<b>Due Date</b>	<b>Date Filed</b>
2013 8 Day Before General Election	3/25/13	4/15/13
2013 October Quarterly	10/15/13	12/17/13
2014 April Quarterly	4/15/14	4/18/14
2014 July Quarterly	7/15/14	10/15/14

2015 January Quarterly	1/15/15	1/22/15
2015 8 Day Before Special Charter Election	2/23/15	2/24/15
2015 8 Day Before General Election	3/30/15	4/20/15
2015 April Limited Activity	4/15/15	4/20/15
2015 July Quarterly	7/15/15	7/16/15
2015 October Quarterly	10/15/15	2/29/16
2016 January Quarterly	1/15/16	2/29/16

10. Respondents failed to file the following five 24 Hour Notices of Late Contributions Received:

<b>FAILURE TO FILE REPORTS &amp; NOTICES</b>			
<b>Name</b>	<b>Amount Received</b>	<b>Date Received</b>	<b>Due Date</b>
St. Louis Association of Realtors PAC	\$500.00	3/25/13	3/26/13
Jolen Investments, LLC	\$1,000.00	3/27/15	3/28/15
Northside Regeneration, LLC	\$500.00	3/27/15	3/28/15
Schlichter, Board & Denton, LLP	\$500.00	3/27/15	3/28/15
Alan Rafterman	\$1,000.00	3/30/15	3/31/15

11. Respondents incorrectly reported start and/or end dates on the cover of four reports, also reporting activity outside of the correct period:

<b>FAILURE TO PROPERLY REPORT IN CORRECT PERIOD</b>				
<b>Report Name</b>	<b>Start Date Reported</b>	<b>End Date Reported</b>	<b>Correct Start Date</b>	<b>Correct End Date</b>
2013 July Quarterly	4/1/13	6/30/13	4/28/13	6/30/13
2015 April Quarterly	3/31/15	3/31/15	3/27/15	3/31/15
2015 30 Day After General Election	3/27/15	4/20/15	4/1/15	5/2/15
2015 July Quarterly	4/21/15	6/30/15	5/3/15	6/30/15

### **COUNT III**

*Failure to accurately report money on hand and indebtedness*

12. Respondents failed to accurately report beginning money on hand on nineteen reports.

13. Respondents failed to accurately report ending money on hand on eighteen reports:

<b>MONEY ON HAND</b>					
<b>Report Name</b>	<b>Dates</b>	<b>Reported Beginning MOH</b>	<b>Reported End MOH</b>	<b>Actual Beginning MOH</b>	<b>Actual End MOH</b>
<b>2013</b>					
Amended January Quarterly	11/26/12 – 12/31/12	\$0.00	\$4,905.04	\$0.00	\$5,001.84
Amended 40 Day Before Special Charter	1/1/13 – 1/19/13	\$4,905.04	\$4,036.15	\$5,001.84	\$4,023.16
Amended 8 Day Before Special Charter	1/20/13 – 2/21/13	\$4,036.15	\$1,579.90	\$4,023.16	\$1,638.42
Amended 8 Day Before General Election	2/22/13 – 3/21/13	\$1,579.90	\$134.27	\$1,638.42	\$29.02
Amended April Quarterly	3/22/13 – 3/31/13	\$134.27	\$1,750.00	\$29.02	\$1,714.13
30 Day After General Election	4/1/13 – 4/27/13	\$0.00	\$0.00	\$1,714.13	\$1,185.35
Amended July Quarterly	4/28/13 – 6/30/13	\$1,599.38	\$3,769.23	\$1,185.35	\$3,769.23
<b>2014</b>					
Amended January Quarterly	10/1/13 – 12/31/13	\$0.00	\$968.22	\$1,300.29	\$968.22
Amended April Quarterly	1/1/14 – 3/31/14	\$968.22	\$134.34	\$968.22	(\$55.66)
Amended July Quarterly	4/1/14 – 6/30/14	\$134.34	\$737.82	(\$55.66)	\$447.82
Amended October Quarterly	7/1/14 – 9/30/14	\$737.82	\$506.34	\$447.82	\$216.34
<b>2015</b>					
Amended January Quarterly	10/1/14 – 12/31/14	\$506.34	\$97.44	\$216.34	(\$262.56)

Amended 40 Day Before Special Quarter	1/1/15 – 1/17/15	\$97.44	\$1,297.44	(\$262.56)	\$937.44
Amended 8 Day Before Special Quarter	1/18/15 – 2/19/15	\$1,297.44	\$3,450.19	\$937.44	\$3,090.19
Amended 8 Day Before General Election	2/20/15 – 3/26/15	\$3,450.19	\$4,605.16	\$3,090.19	\$4,245.16
Amended April Quarterly	3/27/15 – 3/31/15	\$4,623.22	\$4,623.22	\$4,245.16	\$7,320.29
Amended 30 Day After General Election	4/1/15 – 5/2/15	\$4,605.16	\$4,700.74	\$7,320.29	\$3,121.71
Amended July Quarterly	5/3/15 – 6/30/15	\$4,700.74	\$484.33	\$3,121.71	\$5,899.33
October Quarterly	7/1/15 – 9/30/15	\$13,266.89	\$7,288.20	\$5,899.33	\$1,716.43
<b>2016</b>					
January Quarterly	10/1/15 – 12/31/15	\$7,288.20	\$5,685.91	\$1,716.43	\$35.36

14. Due to errors in reported loans and unreported incurred expenditures, the indebtedness was incorrectly documented on twelve reports:

<b>INDEBTEDNESS</b>					
<b>Report Name</b>	<b>Date Filed</b>	<b>Reported</b>		<b>Actual</b>	
		<b>Outstanding Indebtedness Beginning of Period</b>	<b>Total Indebtedness at Close of Period</b>	<b>Outstanding Indebtedness Beginning of Period</b>	<b>Total Indebtedness at Close of Period</b>
<b>2014</b>					
Amended April Quarterly	6/28/15	\$0.00	\$190.00	\$0.00	\$0.00
Amended July Quarterly	6/29/15	\$190.00	\$190.00	\$0.00	\$0.00
Amended October Quarterly	6/29/15	\$190.00	\$190.00	\$0.00	\$0.00
<b>2015</b>					
Amended January Quarterly	6/29/15	\$190.00	\$190.00	\$0.00	\$0.00
Amended 40 Day	7/13/15	\$190.00	\$190.00	\$0.00	\$0.00

Before Special Charter					
Amended 8 Day Before Special Charter	11/9/15	\$190.00	\$190.00	\$0.00	\$0.00
Amended 8 Day Before General Election	11/11/15	\$190.00	\$190.00	\$0.00	\$0.00
Amended April Quarterly	11/9/15	\$190.00	\$190.00	\$0.00	\$0.00
Amended 30 Day After General Election	11/11/15	\$190.00	\$190.00	\$0.00	\$0.00
Amended July Quarterly	11/11/15	\$190.00	\$190.00	\$0.00	\$300.00
October Quarterly	2/29/16	\$190.00	\$190.00	\$300.00	\$750.00
<b>2016</b>					
January Quarterly	2/29/16	\$190.00	\$190.00	\$750.00	\$750.00

**COUNT IV**

*Failure to timely and accurately report contributions received*

15. Respondents failed to report forty-one monetary contributions received of \$100.00 or less, totaling \$2,525.00:

<b>CONTRIBUTIONS &amp; MISCELLANEOUS RECEIPTS NOT REPORTED OF \$100.00 OR LESS</b>		
Contributor Name	Amount	Report Not Showing Contribution
Gregory Ogilvie	\$50.00	2013 January Quarterly
Judith Mitchell	\$25.00	2013 8 Day Before Special Charter
Daniel Schulte	\$50.00	2013 July Quarterly
Patrick Kiernan	\$50.00	2013 July Quarterly
Brandon Sterling	\$50.00	2013 July Quarterly
TA Hebron	\$25.00	2013 July Quarterly
Stephanie Varga	\$50.00	2015 8 Day Before General Election
Robert Byrne	\$25.00	2015 July Quarterly
Joseph Koestner	\$50.00	2015 October Quarterly
Joy & Ronald Christensen	\$50.00	2015 October Quarterly
Kathleen Ratcliffe	\$100.00	2015 October Quarterly
Matthew Thenhaus	\$50.00	2015 July Quarterly
Mark & Carmela Keoshkerian	\$100.00	2015 October Quarterly
Erika Warner	\$50.00	2015 October Quarterly

Matthew Brzelton & Jeffrey Jensen	\$50.00	2015 October Quarterly
Paul Whitsitt	\$50.00	2015 October Quarterly
Christopher & Georgiana Grant	\$75.00	2015 October Quarterly
Gregory Klass	\$100.00	2015 October Quarterly
Kathleen Greminger	\$50.00	2015 October Quarterly
Todd Swanstrom	\$30.00	2015 October Quarterly
Laura Costello	\$25.00	2015 October Quarterly
State Farm John Hayden, Agent	\$50.00	2015 October Quarterly
Jeffrey Hackman & Rachel Smith	\$25.00	2015 October Quarterly
Megan Green	\$25.00	2015 October Quarterly
Real Estate Solutions	\$50.00	2015 October Quarterly
William Kuehling	\$100.00	2015 October Quarterly
Thomas Pickel	\$100.00	2015 October Quarterly
Robert Ogden & Gary Belle	\$100.00	2015 October Quarterly
Harold Schmeling	\$100.00	2015 October Quarterly
Leroy Grant Jr	\$100.00	2015 October Quarterly
MR & Carolyn McAvoy	\$100.00	2015 July Quarterly
Mary & David Visintainer	\$50.00	2015 October Quarterly
Paul & Mollie Seel	\$100.00	2015 July Quarterly
Christopher & Mary Pat Carl	\$50.00	2015 October Quarterly
Renovations Unlimited, LLC	\$100.00	2015 October Quarterly
Sheet Metal Workers International Assoc.	\$100.00	2015 October Quarterly
Tami Miles	\$20.00	2015 October Quarterly
Barbara Miles	\$25.00	2015 October Quarterly
Dennis & Rhonda Kaiser	\$25.00	2015 October Quarterly
Jennifer Pruehsner	\$100.00	2015 October Quarterly
Intimate Reconnections, LLC	\$100.00	2015 October Quarterly

16. Respondents failed to report twenty-three monetary contributions received over \$100.00, totaling \$5,900.00, and one in-kind contribution, totaling \$413.00:

<b>CONTRIBUTIONS &amp; MISCELLANEOUS RECEIPTS NOT REPORTED OF OVER \$100.00 AND ONE IN-KIND CONTRIBUTION</b>		
<b>Contributor Name</b>	<b>Amount</b>	<b>Report Not Showing Contribution</b>
John & Christine Ingrassia (in-kind)	\$413.00	2013 January Quarterly
St. Louis Police Officers Assoc PAC	\$200.00	2015 July Quarterly
Joshua Peters for the 76th District	\$125.00	2015 July Quarterly
International Assoc of Fire Fighters Local #73	\$200.00	2015 July Quarterly
IUPAT PAC	\$250.00	2015 October Quarterly
Heat & Frost Insulators & Allied Workers Local No. 1	\$250.00	2015 July Quarterly
Enterprise Holdings, Inc. PAC	\$250.00	2015 October Quarterly
Joseph & Mary Anne Sedey	\$250.00	2015 October Quarterly



M Property Services LLC	\$250.00	2015 October Quarterly
Katherine Jenkins & John Maxwell	\$200.00	2015 October Quarterly
Diversified Homes LLC	\$200.00	2015 October Quarterly
Jolen Investments, LLC	\$500.00	2015 October Quarterly
Duffe-Nuernberger Realty Co. LLC	\$200.00	2015 October Quarterly
The Pinewoods Company DBA Bruton Stroube Studios	\$250.00	2015 October Quarterly
Bruce A. Kraemer	\$150.00	2015 October Quarterly
Citizens to Elect Jamilah Nasheed	\$500.00	2015 October Quarterly
Sheet Metal Workers International Assoc.	\$275.00	2015 October Quarterly
Diversified Homes, LLC	\$150.00	2015 October Quarterly
CWA - COPE PAC	\$300.00	2015 October Quarterly
International Union of Elevator Constructors Local No. 3 PAC	\$150.00	2015 October Quarterly
Affordable City Homes of St Louis Inc.	\$250.00	2015 October Quarterly
Kevin Morrell Revocable Trust, Jane & Kevin Morrell Trustee	\$500.00	2015 October Quarterly
Stephen Acree	\$500.00	2015 October Quarterly

17. Respondents failed to report three miscellaneous receipts of \$100.00 or less, totaling \$154.00:

<b>MISCELLANEOUS RECEIPTS OF \$100.00 OR LESS</b>		
<b>Contributor Name</b>	<b>Amount</b>	<b>Report Not Showing Receipts</b>
Bank of America	\$70.00	2015 October Quarterly
Bank of America	\$70.00	2015 October Quarterly
Bank of America	\$14.00	2015 October Quarterly

18. Respondents failed to report two miscellaneous receipts over \$100.00, totaling \$210.00:

<b>MISCELLANEOUS RECEIPTS OVER \$100.00</b>		
<b>Contributor Name</b>	<b>Amount</b>	<b>Report Not Showing Receipts</b>
Bank of America	\$105.00	2015 October Quarterly
Bank of America	\$105.00	2015 October Quarterly

19. Respondents inaccurately reported fourteen non-itemized contributions, totaling \$1,200.00.

20. Respondents inaccurately reported twenty-seven itemized contributions totaling \$12,400.00.

21. Respondents failed to timely report ninety-nine contributions of \$100.00 or less, totaling \$5,750.00.

22. Respondents failed to timely report twenty-two contributions over \$100.00, totaling \$8,325.00.

23. Respondents failed to timely and accurately report a miscellaneous receipt of \$100.00 or less, totaling \$40.67.

24. Respondents reported three non-itemized contributions, totaling \$175.00 that could not be found in any of the bank accounts:

<b>CONTRIBUTIONS &amp; MISCELLANEOUS RECEIPTS REPORTED BUT NOT FOUND IN OFFICIAL FUND DEPOSITORY</b>		
<b>Report Name</b>	<b>Contributor Name</b>	<b>Amount</b>
2013 Amended 40 Day Before	Kevin Collier	\$100.00
2013 July Quarterly	Robert Sternberg	\$25.00
2015 Amended 8 Day Before General Election	David Sapienza	\$50.00

25. Respondents reported a loan totaling \$190.00 which was not found in the committee's bank account:

<b>LOANS REPORTED BUT NOT FOUND</b>		
<b>Report Name</b>	<b>From</b>	<b>Amount</b>
2014 April Quarterly	Bank of America	\$190.00

**COUNT V**

*Failure to timely and accurately report expenditures*

26. Respondents failed to report twenty-five monetary expenditures of \$100.00 or less, totaling \$687.87:

<b>EXPENDITURES NOT REPORTED OF \$100.00 OR LESS</b>		
<b>Expenditure Name</b>	<b>Amount</b>	<b>Report Not Showing Expenditure</b>
Shur Sav Inc.	\$20.00	2013 8 Day Before Special Charter
Paypal fee	\$1.03	2013 8 Day Before Special Charter
Paypal fee	\$1.75	2013 8 Day Before General Election
Paypal fee	\$1.75	2013 8 Day Before General Election
Paypal fee	\$1.75	2013 8 Day Before General Election
Michael Powers	\$30.00	2013 April Quarterly
Mycommerce, Inc.	\$99.89	2013 30 Day After General Election
ATM withdrawal	\$100.00	2014 July Quarterly
Friends of Troop 6 San Francisco	\$70.00	2015 January Quarterly
Kitchen House Coffee	\$5.08	2015 30 Day After General Election
El Paisano Mexican Restaurant	\$38.57	2015 30 Day After General Election
Kitchen House Coffee	\$10.24	2015 30 Day After General Election
Kitchen House Coffee	\$6.98	2015 30 Day After General Election
Pw Pizza	\$10.74	2015 30 Day After General Election
Dirt Cheap	\$10.80	2015 30 Day After General Election
American Airlines	\$25.00	2015 October Quarterly
Busboys & Poets	\$16.00	2015 October Quarterly
American Airlines	\$25.00	2015 October Quarterly
Go Wireless	\$28.78	2016 January Quarterly
NWPC - Metro StL	\$60.00	2016 January Quarterly
Bank of America	\$35.00	2016 July Quarterly
Byrd & Barrel	\$33.91	2016 July Quarterly
QuikTrip	\$6.60	2016 July Quarterly
Bank of America	\$35.00	2016 July Quarterly
Bank of America	\$14.00	2016 July Quarterly

27. Respondents failed to report four incurred expenditures over \$100.00, totaling \$1,200.00:

<b>EXPENDITURES NOT REPORTED OVER \$100.00</b>		
<b>Expenditure Name</b>	<b>Amount</b>	<b>Report Not Showing Expenditure</b>
Jason Lewis	\$300.00	July Quarterly 2015

Jason Lewis	\$300.00	October Quarterly 2015
Jason Lewis	\$300.00	July Quarterly 2015
Jason Lewis	\$300.00	October Quarterly 2015

28. Respondents inaccurately reported thirty-five non-itemized expenditures totaling \$1,225.39.

29. Respondents inaccurately reported six itemized expenditures totaling \$1,516.91.

30. Respondents failed to timely report 196 non-itemized expenditures totaling \$7,017.19.

31. Respondents failed to timely report forty-four itemized expenditures totaling \$22,272.01.

32. Respondents reported four non-itemized expenditures totaling \$85.82, which were not found in the official fund depository:

<b>EXPENDITURES REPORTED NOT FOUND IN OFFICIAL FUND DEPOSITORY</b>		
<b>Report Name</b>	<b>Expenditure Name</b>	<b>Amount</b>
2013 8 Day Before Special Charter	Anthony Stevenson	\$20.00
2015 Amended 30 Day After General	Bank of American – Fee	\$5.00
Amended July Quarterly 2015	Food and Drink expenses	\$19.03
October Quarterly 2015	Uber and cab expenses	\$41.79

33. Respondents failed to file Independent Contractor Reports for ten applicable payments totaling \$5,473.57:

<b>INDEPENDENT CONTRACTOR FORM NOT FILED</b>		
<b>Report Name</b>	<b>Expenditure Name</b>	<b>Amount</b>
2013 Amended 8 Day Before Special Charter	Jay Buerck	\$283.00
2013 Amended 8 Day Before General Election	Woodley Park Group	\$249.00

2013 Amended 8 Day Before General Election	Woodley Park Group	\$913.39
2013 Amended 8 Day Before General Election	Woodley Park Group	\$276.42
2013 July Quarterly	Woodley Park Group	\$425.00
2013 Amended October Quarterly	Woodley Park Group	\$190.00
2013 Amended October Quarterly	Woodley Park Group	\$136.76
2015 Amended July Quarterly	Adam Rankin	\$1,000.00
2015 October Quarterly	Adam Rankin	\$1,000.00
2015 October Quarterly	Angela Bingaman	\$1,000.00

### **COUNT VI**

#### *Failure to maintain committee records in accordance with accepted normal bookkeeping procedures*

34. Respondents did not maintain records in accordance with accepted normal bookkeeping procedures, including failure to maintain records necessary to prepare and substantiate some of the contributions that Respondents received and expenditures that Respondents made.

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

#### **COUNT I**

#### *Cash expenditures in excess of allowed limits*

35. “Except for expenditures from a petty cash fund which is established and maintained by withdrawals from the committee’s depository account and with records maintained pursuant to the recordkeeping requirements of section 130.036 to account for expenditures made from petty cash, each expenditure of more than fifty dollars, except an in-kind expenditure, shall be made by check drawn on the committee’s depository and signed by the committee treasurer, deputy treasurer or candidate. A single expenditure from a petty cash fund shall not exceed fifty dollars, and the aggregate of all expenditures from a petty cash fund during a calendar year shall not exceed the lesser of five thousand dollars or ten

percent of all expenditures made by the committee during that calendar year. A check made payable to 'cash' shall not be made except to replenish a petty cash fund." § 130.031.2, RSMo.

36. There is probable cause to believe that Respondents violated Section 130.031.2, RSMo, by making eight cash expenditures, each in excess of \$50.00, and totaling \$815.00, and that Respondents did so knowingly.

### **COUNT II**

#### *Failure to timely file campaign finance disclosure reports and notices*

37. Pursuant to § 130.046.1, RSMo, Respondents were required to file campaign finance disclosure reports at the following times and for the following periods:

(1) Not later than the eighth day before an election for the period closing on the twelfth day before the election if the committee has made any contribution or expenditure either in support or opposition to any candidate or ballot measure;

(2) Not later than the thirtieth day after an election for a period closing on the twenty-fifth day after the election, if the committee has made any contribution or expenditure either in support of or opposition to any candidate or ballot measure; except that, a successful candidate who takes office prior to the twenty-fifth day after the election shall have complied with the report requirement of this subdivision if a disclosure report is filed by such candidate and any candidate committee under the candidate's control before such candidate takes office, and such report shall be for the period closing on the day before taking office; and

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

38. Pursuant to § 130.046.5(2), RSMo, no disclosure report needs to be filed for any reporting period if during that reporting period the committee has neither received contributions aggregating more than five hundred dollars nor made expenditure aggregating more than five hundred dollars and has not received contributions aggregating more than three hundred dollars from any single contributor and if the committee's treasurer files a statement with the appropriate officer that the committee has not exceeded the identified thresholds in the reporting period. Any contributions received or expenditures made which are not reported because this statement is filed in lieu of a disclosure report shall be included in the next disclosure report filed by the committee.

39. Pursuant to § 130.050.3, RSMo, the receipt of any late contribution or loan of more than two hundred fifty dollars by a candidate committee supporting a candidate for statewide office or by any other committee shall be reported to the appropriate officer no later than twenty-four hours after receipt.

40. "The reporting dates and periods covered for such quarterly reports shall not be later than the fifteenth day of January, April, July and October for periods closing on the thirty-first day of December, the thirty-first day of March, the thirtieth day of June and the thirtieth day of September... Each report by such committee shall be cumulative from the date of the last report. In the case of the continuing committee's first report, the report shall be cumulative from the date of the continuing committee's organization... Every candidate, treasurer or deputy treasurer shall file, at a minimum, the campaign disclosure reports covering the quarter

immediately preceding the date of the election and those required by subdivisions (1) and (2) of subsection 1 of this section.” § 130.046.3, RSMo.

41. There is probable cause to believe that Respondents violated Sections 130.046.1, 130.046.5, 130.046.3, and 130.050.3, RSMo, by failing to file five reports, failing to timely file ten reports, incorrectly reporting start and/or end dates on the cover of four reports and failing to properly report in correct period, and that Respondents did so knowingly.

### **COUNT III**

#### *Failure to accurately report money on hand and indebtedness*

42. Pursuant to Sections 130.041.1(2) and 130.041.1(5), RSMo, Respondents were required to disclose the amount of cash on hand as of the beginning of the reporting period and the closing date of the reporting period.

43. Pursuant to § 130.041.1(6), RSMo, Respondents were required to report “the total amount of outstanding indebtedness as of the closing date of the reporting period covered.”

44. There is probable cause to believe that Respondents violated Sections 130.041.1(2), 130.041.1(5), and 130.041.1(6), RSMo, by incorrectly reporting beginning and ending money on hand on nineteen reports and documenting indebtedness incorrectly on twelve reports, and that Respondents did so knowingly.

### **COUNT IV**

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

45. 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...

(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.

46. "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." § 130.021.4(1), RSMo.

47. There is probable cause to believe that Respondents violated Sections 130.041.1(3) and 130.021.4, RSMo, by failing to disclose \$8,838.00 in contributions, inaccurately reporting \$13,600.00, failing to timely report \$31,742.00, reporting \$175.00 in contributions/loans that were not deposited into the official depository account, inaccurately reporting the aggregate amount of contributions \$100.00 or less, inaccurately reporting contributions over \$100.00, and failing to timely report and report miscellaneous receipts, and that Respondents did so knowingly.

COUNT V

*Failure to timely and accurately report expenditures*

48. Pursuant to Section 130.041.1(4), RSMo, 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;

...

49. "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." § 130.021.4(1), RSMo.

50. There is probable cause to believe that Respondents violated Section 130.041.1(4), RSMo, by failing to report expenditures totaling \$1,887.87, improperly reporting expenditures greater than \$100.00 by failing to itemize them, inaccurately reporting the aggregate of expenditures of \$100 or less by category, failing to accurately report expenditures totaling \$2,842.30, failing to report expenditures timely totaling \$29,289.20, reporting a total of \$85.82 in non-itemized expenditures that were not found in the official fund depository, and by failing to file Independent Contractor forms totaling \$5,473.57, and that Respondents did so knowingly.

#### COUNT VI

##### *Failure to maintain committee records in accordance with accepted normal bookkeeping procedures*

51. “The candidate, treasurer or deputy treasurer of a committee shall maintain accurate records and accounts on a current basis... The records and accounts shall be maintained in accordance with accepted normal bookkeeping procedures and shall contain the bills, receipts, deposit records, cancelled checks and other detailed information necessary to prepare and substantiate any statement or report required to be filed pursuant to this chapter.” § 130.036.1, RSMo.

52. There is probable cause to believe that Respondents Christine Ingrassia and Friends of Christine Ingrassia, violated Section 130.036, RSMo, by failing to maintain Respondents’ campaign finance records and accounts in accordance with accepted normal bookkeeping procedures, including bills, receipts, deposit records, cancelled checks and other detailed information necessary to prepare and substantiate any statement or report required under Chapter 130, RSM, 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 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. It is the Order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$19,904.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$2,723.00 of that fee within forty-five days after the date of the Order, the remainder of the fee will be stayed. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.

c. Regardless of the stay in paragraph 2.b above, if any Respondent commits any further violation of the campaign finance laws under Chapter 130, RSMo, within the two-year period from the date of this order, then Respondents will be required to pay the remainder of the fee. The fee will due immediately upon final adjudication finding that any Respondent has committed 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 attorneys of or from any liability, claim, actions, causes of action, fees, costs and expenses, and compensation, including but not limited to, a claim for attorney's fees whatsoever which Respondents or Respondents' attorney may now have or which they may hereafter have, which are based upon or arise out of the above cases.

SO AGREED:

RESPONDENT CHRISTINE INGRASSIA

By: CE Ingrassia 1/19/18  
Christine Ingrassia Date

RESPONDENT FRIENDS OF CHRISTINE INGRASSIA

By: CE Ingrassia 1/9/18  
Christine Ingrassia Date

PETITIONER MISSOURI ETHICS COMMISSION

By: James Klahr 1/9/18  
James Klahr Date  
Executive Director

By: Brian Hamilton 1/9/18  
Brian Hamilton Date  
Attorney for Petitioner

ATTORNEY FOR RESPONDENTS: MATT VIANELLO

By: Matt Vianello 1/8/18  
Matt Vianello, Attorney Date

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,                    )  
  )  
  ) Petitioner,                                        )  
  )  
v.    )  
  )  
CHRISTINE INGRASSIA,                            ) Case No. 16-0004-A  
  )  
and   )  
  )  
FRIENDS OF CHRISTINE INGRASSIA,             )  
  )  
  ) Respondents.                                        )

**CONSENT ORDER**

The parties have filed a Joint Stipulation of Facts, Waiver of Hearing, and Proposed Consent Order with the Missouri Ethics Commission. Accordingly, the Missouri Ethics Commission accepts as true the facts stipulated and finds that Respondents Christine Ingrassia and Friends of Christine Ingrassia violated Sections 130.031.2, 130.046.1, 130.046.5, 130.046.3, 130.050.3, 130.041.1(2), 130.041.1(5), 130.041.1(6), 130.041.1(3), 130.021.4, 130.041.1(4), and 130.036, RSMo.

The Commission directs that the Joint Stipulation be adopted.

1. Respondents shall comply with all relevant sections of Chapter 130, RSMo.
2. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$19,904.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$2,723.00 of that fee within forty-five (45) days after 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.

3. If any Respondent commits any further violation of the campaign finance laws pursuant to Chapter 130, RSMo, within the two-year period from the date of this order, then Respondents will be required to pay the remainder of the fee. The fee will be due immediately upon final adjudication finding that any Respondent committed such a violation.
4. Respondents shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 9<sup>th</sup> day of January, 2018

By:



---

Nancy Hagan, Chair  
Missouri Ethics Commission