

**Filed**  
**MAR 23 2018**  
Missouri Ethics  
Commission

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,            )  
  )  
  )            Petitioner,            )  
  )  
v.    )  
  )  
BERTRAM ATKINS,                                    )            Case No. 17-0004-A  
  )  
and    )  
  )  
CITIZENS FOR BERT ATKINS,                    )  
Candidate Committee                            )  
  )  
  )            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, Bertram Atkins and Citizens for Bert Atkins, 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 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.<sup>1</sup>
2. Respondent Atkins registered a candidate committee, Citizens for Bert Atkins, with the Missouri Ethics Commission on May 1, 2008 and terminated this committee on December 6, 2012.
3. Respondent Atkins was a successful candidate in his previous runs for State Representative in 2008 and 2010, serving in the House of Representatives from 2009 to January 2013.
4. Respondent Atkins was an unsuccessful candidate for a seat in the House of Representatives in the August 7, 2012 primary election.

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<sup>1</sup> Unless noted otherwise, all statutory references are to the Revised Statutes of Missouri 2000 (Supp. 2016).

5. Respondent Atkins registered his current candidate committee, Citizens for Bert Atkins, with the Missouri Ethics Commission by filing a Statement of Committee Organization on October 14, 2015 for the August 2, 2016 primary election.

6. Respondent Atkins was an unsuccessful candidate for the Missouri House of Representatives in the August 2, 2016 primary election.

7. Respondent Atkins listed US Bank at 2100 N. Highway 67, Florissant, MO 63033 with account number \*0818 as the official fund depository account on the Statement of Committee Organization.

8. Respondent Atkins listed himself as the treasurer of his current committee on the Statement of Committee Organization.

9. Pursuant to §§ 105.959 and 105.961, RSMo, the Commission's staff investigated the reports and statements filed with the Commission and reported the investigation findings to the Commission.

10. Based on the investigation report, 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 § 105.961.3, RSMo.

### COUNT I

#### *Cash contributions in excess of limits*

11. Respondents accepted two cash contributions that were in excess of \$100 each, totaling \$2,500.00.

<b>Report Name</b>	<b>Date Filed</b>	<b>Name</b>	<b>Amount</b>
8 Day Before Special Election - 11/3/15	10/26/15	Bert Atkins	\$1,000.00
Not Reported	N/A	Bert Atkins	\$1,500.00
<b>Total</b>			<b>\$2,500.00</b>

**COUNT II**

*Failure to timely and accurately file campaign finance disclosure reports with cumulative information from the date of the last report*

12. Respondents inaccurately reported beginning and ending money on hand on four reports in 2016.

Report Name	From	To	Reported		Actual	
			MOH at Beginning of Period	MOH at End of Period	MOH at Beginning of Period	MOH at End of Period
<b>2016</b>						
January Quarterly	10/23/15	12/31/15	\$1,014.32	\$719.62	\$1,006.32	\$629.82
Amended April Quarterly	1/1/16	3/31/16	\$719.62	\$1,364.69	\$629.82	\$1,271.89
July Quarterly	4/1/16	6/30/16	\$1,364.69	\$774.37	\$1,271.89	\$2,018.57
8 Day Before Primary - 8/2/16	7/1/16	7/21/16	\$774.37	\$1,073.40	\$2,018.57	\$2,317.60

13. Respondents incorrectly reported indebtedness on three reports in 2016.

Report Name	Date Filed	Reported		Actual	
		Outstanding Indebtedness Beginning of Period	Total Indebtedness at Close of Period	Outstanding Indebtedness Beginning of Period	Total Indebtedness at Close of Period
<b>2016</b>					
Amended April Quarterly	5/11/16	\$0.00	\$0.00	\$4,000.00	\$4,000.00
July Quarterly	7/14/16	\$0.00	\$0.00	\$4,000.00	\$4,000.00
8 Day Before Primary Election - 8/2/16	7/25/16	\$0.00	\$1,000.00	\$4,000.00	\$5,000.00

14. Respondents failed to file a full disclosure report and two limited activity statements.

Report Name	Report Year	Closing Date	Due Date
30 Day After Primary Election report	2016	8/27/16	9/1/16
October Quarterly- Limited Activity	2016	9/30/16	10/17/16
April Quarterly - Limited Activity	2017	3/31/17	4/17/17

### COUNT III

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

15. Respondents failed to report four monetary contributions over \$100.00, totaling \$5,250.00.

<b>Contributor Name</b>	<b>Amount</b>	<b>Date</b>	<b>Report Not Showing Contribution</b>
Bert Atkins	\$1,500.00	4/13/16	July Quarterly
Bert Atkins	\$3,000.00	7/25/16	30 Day After Primary - 8/2/16
Anheuser Busch Companies	\$500.00	8/15/16	30 Day After Primary - 8/2/16
UAW Region 5 Midwest States PAC	\$250.00	8/15/16	30 Day After Primary - 8/2/16
<b>Total</b>	<b>\$5,250.00</b>		

16. Respondents inaccurately reported one non-itemized contribution, totaling \$25.00, as anonymous when the contribution was received by check.

<b>Report Name</b>	<b>Date Filed</b>	<b>Contributor Name</b>	<b>Amount</b>
Amended April Quarterly	5/11/16	CF/ID Wimberly	\$25.00

17. Respondents inaccurately reported two itemized contributions, totaling \$600.00, from other committees that the contributor names were incorrectly reported because they were not identified as a committee on the campaign finance disclosure reports.

<b>Report Name</b>	<b>Date Filed</b>	<b>Contributor Name</b>	<b>Amount</b>	<b>Comments</b>
April Quarterly	4/15/16	Aerospace Lodge 837-IAMAW PAC	\$300.00	This was reported with the name "IAMAW".
July Quarterly	7/14/16	MO Rental Dealers Association PAC	\$300.00	This was reported with the name "MO Retail Dealers Association".
		<b>Total</b>	<b>\$600.00</b>	

18. Respondents held a fundraiser at Hendel's Market at 599 St. Dennis, Florissant, MO 63031 on December 9, 2015.

19. Respondents reported a single contribution of \$250.00 on the fundraising form filed with the 2016 January Quarterly report, but failed to also report and itemize the contribution on the 2016 January Quarterly report.

<b>Report Name</b>	<b>Date Filed</b>	<b>Contributor Name</b>	<b>Amount</b>
January Quarterly	1/15/16	Bruce Darrough	\$250.00

*Failure to accurately report a fundraiser*

20. On January 15, 2016 Respondents filed a fundraiser form with their 2016 January Quarterly report. On the fundraising form, Respondents reported \$425.00 in contributions of \$100 or less per person as coming from individuals whose names and addresses that could not be obtained. However, the official fund depository account shows that this amount included five contributions totaling \$275.00 that were received by check; therefore, Respondents should have listed these contributors as persons whose name and addresses that were contained in committee records.

<b>Report Name</b>	<b>Date Filed</b>	<b>Contributor Name</b>	<b>Amount</b>
January Quarterly	1/15/16	William Otto	\$100.00
January Quarterly	1/15/16	Marilyn Degenhardt	\$50.00
January Quarterly	1/15/16	John & Jeanette Darity	\$50.00
January Quarterly	1/15/16	Theresa Unser	\$25.00
January Quarterly	1/15/16	Earl Schuesler	\$50.00
<b>Total</b>			<b>\$275.00</b>

**COUNT IV**

*Failure to timely and accurately report expenditures*

21. Respondents failed to report ten monetary expenditures of \$100.00 or less, totaling \$129.08 on six reports.

<b>Expenditure Name</b>	<b>Amount</b>	<b>Date</b>	<b>Report Not Showing Expenditure</b>
Bank fee	\$8.00	10/19/15	8 Day Before Special - 11/3/15
Bank fee	\$3.00	3/14/16	April Quarterly 2016

Bank fee	\$3.00	4/14/16	July Quarterly
Mark's Quick Printing	\$97.08	7/27/16	30 Day After Primary - 8/2/16
Bank fee	\$3.00	8/12/16	30 Day After Primary - 8/2/16
Bank fee	\$3.00	9/15/16	October Quarterly
Bank fee	\$3.00	10/17/16	April Quarterly 2017
Bank fee	\$3.00	11/15/16	April Quarterly 2017
Bank fee	\$3.00	12/14/16	April Quarterly 2017
Bank fee	\$3.00	1/17/17	April Quarterly 2017
<b>Total</b>	<b>\$129.08</b>		

22. Respondents failed to report five monetary expenditures of over \$100.00, totaling \$5,614.10 on two reports.

<b>Expenditure Name</b>	<b>Amount</b>	<b>Date</b>	<b>Report Not Showing Expenditure</b>
Media Magic	\$160.00	4/13/16	July Quarterly
Independent News	\$325.00	7/25/16	30 Day After Primary - 8/2/16
Media Magic	\$3,000.00	7/25/16	30 Day After Primary - 8/2/16
Allmail	\$1,306.50	7/26/16	30 Day After Primary - 8/2/16
Media Magic	\$822.60	8/16/16	30 Day After Primary - 8/2/16
<b>Total</b>	<b>\$5,614.10</b>		

23. Respondents reported a payment of \$331.80 to Hendel's Market on the fundraising form filed with the 2016 January Quarterly report and it was shown as "meet & greet fundraiser" as the expenditure name; however, the expenditure was not itemized on the 2016 January Quarterly report.

*Failure to accurately report independent contractor expenditures*

24. Respondents failed to timely and accurately file an Independent Contractor form for a \$335.00 payment to Media Magic Public Relations.

<b>Report Name</b>	<b>Date Filed</b>	<b>Expenditure Name</b>	<b>Purpose</b>	<b>Amount</b>	<b>Date</b>
Amended April Quarterly	5/11/16	Media Magic Public Relations	Consulting	\$335.00	2/9/16

25. Respondents failed to file an Independent Contractor form for four payments to Media Magic Public Relations, totaling \$4,582.60.

<b>Report Name</b>	<b>Date Filed</b>	<b>Expenditure Name</b>	<b>Purpose</b>	<b>Amount</b>	<b>Date</b>
January Quarterly	1/15/16	Media Magic Public Relations	Campaign advisor	\$600.00	11/17/15
Not reported	N/A	Media Magic Public Relations	Unknown	\$160.00	4/13/16
Not reported	N/A	Media Magic Public Relations	Unknown	\$3,000.00	7/25/16
Not reported	N/A	Media Magic Public Relations	Unknown	\$822.60	8/16/16
<b>Total</b>				<b>\$4,582.60</b>	

**COUNT V**

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

26. Respondents did not provide the Commission with any invoices, checks, receipts, deposit records, and/or other detailed information necessary to prepare and substantiate any statement or report required to be filed for contributions received or expenditures made.

27. 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 Respondent received and expenditures made.

**JOINT PROPOSED CONCLUSIONS OF LAW**

**COUNT I**

*Cash contributions in excess of limits*

28. For purposes of Chapter 130, RSMo, cash means “currency, coin, United States postage stamps, or any negotiable instrument which can be transferred from one person to another person without the signature or endorsement of the transferor.” § 130.011(4), RSMo.



29. “No contribution of cash in an amount of more than one hundred dollars shall be ... accepted from any single contributor for any election by a ... candidate committee.” § 130.031.1, RSMo.

30. “No contribution in cash in an amount in excess of one hundred dollars shall be made or accepted from any single contributor for any election.” § 130.110(1), RSMo.

31. “Candidates and candidate committees shall not accept contributions of cash that, in the aggregate, are in excess of one hundred dollars per person per election cycle.” § 130.110(2), RSMo.

32. There is probable cause to believe that Respondents violated §§ 130.031.1, 130.110(1), and 130.110(2), RSMo, by accepting two cash contributions that were in excess of \$100 each from a single contributor in an election cycle, totaling \$2,500.00, and that Respondents did so knowingly.

## **COUNT II**

### *Failure to timely and accurately file campaign finance disclosure reports with cumulative information from the date of the last report*

33. Campaign finance disclosure reports must contain the total amount of money on hand at the beginning and end of the reporting period, and the total amount of outstanding indebtedness as of the closing date of the reporting period. § 130.041.1, RSMo.

34. Pursuant to § 130.041.1(6), RSMo, “every committee which is required to file a statement of organization, shall file a legibly printed or typed disclosure report of receipts and expenditures. The reports shall be filed with the appropriate officer designated in section 130.026 at the times and for the periods prescribed in section 130.046. Except as provided in sections 130.049 and 130.050, each report shall set forth:

...

(6) The total amount of outstanding indebtedness as of the closing date of the reporting period covered;...”

§ 130.041.1(6), RSMo.

35. “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.” § 130.046.5(2), RSMo.

36. All committees must file regular 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.

Notwithstanding the provisions of this subsection, if any committee accepts contributions or makes expenditures in support of or in opposition to a ballot measure or a candidate, and the report required by this subsection for the most recent calendar quarter is filed prior to the fortieth day before the election on the measure or candidate, the committee shall file an additional disclosure report not later than the fortieth day before the election for the period closing on the forty-fifth day before the election.

§130.046.1, RSMo.

37. There is probable cause to believe that Respondents violated §§ 130.041.1, 130.046.1, 130.046.5(2), and 130.041.1(6), RSMo, by inaccurately reporting beginning and ending money on hand on four reports in 2016, inaccurately documenting indebtedness on three reports in 2016, and failing to file a full disclosure report and two limited activity statements, and that Respondents did so knowingly.

### **COUNT III**

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

38. Candidate committees are required to report receipts for each reporting period, including:

(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;

(b) Total amount of all anonymous contributions accepted;

(c) Total amount of all monetary contributions received through fund-raising events or activities from participants whose names and addresses were not obtained with such contributions, with an attached statement or copy of the statement describing each fund-raising event as required in subsection 6 of section 130.031;

(d) Total dollar value of all in-kind contributions received;

(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.

*Failure to accurately report a fundraiser*

39. “[C]ontributions 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:

...

(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:

...

(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

40. There is probable cause to believe that Respondents violated §§ 130.041.1(3) and 130.031.6 RSMo, by failing to report four monetary contributions totaling \$5,250.00, inaccurately reporting one \$25.00 contribution as anonymous that was actually received by check, failing to itemize a single contribution of \$250.00 on the full disclosure report, inaccurately reporting two itemized contributions, totaling \$600.00, received from two other committees, and failing to accurately reporting five contributions totaling \$275.00 on the fundraiser form, and that Respondents did so knowingly.

#### **COUNT IV**

##### *Failure to timely and accurately report expenditures*

41. Candidate committees are required to report expenditures for each reporting period, including:

(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.

*Failure to accurately report independent contractor expenditures*

42. “The reporting of any payment to such an independent contractor shall be on a form supplied by the appropriate officer, established by the ethics commission and shall include identification of the specific service or services provided including, but not limited to, public opinion polling, research on issues or opposition background, print or broadcast media production, print or broadcast media purchase, computer programming or data entry, direct mail production, postage, rent, utilities, phone solicitation, or fund raising, and the dollar amount prorated for each service.” § 130.041.4, RSMo.

43. “The words ‘consulting or consulting services, fees, or expenses’, or similar words, shall not be used to describe the purpose of a payment as required in this section.” § 130.041.4, RSMo.

“The reporting of any payment to such an independent contractor shall be on a form supplied by the appropriate officer, established by the ethics commission and shall include identification of the specific service or services provided including, but not limited to, public opinion polling, research on issues or opposition background, print or broadcast media production, print or broadcast media purchase, computer programming or data entry,

direct mail production, postage, rent, utilities, phone solicitation, or fund raising, and the dollar amount prorated for each service.” § 130.041.4, RSMo.

44. “The words ‘consulting or consulting services, fees, or expenses’, or similar words, shall not be used to describe the purpose of a payment as required in this section.” § 130.041.4, RSMo.

45. There is probable cause to believe that Respondents violated §§ 130.041.1(4) and 130.041.4, RSMo, by failing to report fifteen expenditures totaling \$5,743.18, failing to itemize a \$331.80 expenditure on the 2016 January Quarterly report, failing to timely and accurately file an Independent Contractor form on the 2016 April Quarterly report, and failing to file an Independent Contractor form for four payments totaling \$4,582.60, and that Respondents did so knowingly.

#### **COUNT V**

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

46. “The candidate, treasurer or deputy treasurer of a committee shall maintain accurate records and accounts on a current basis.” § 130.036.1, RSMo.

47. “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.

48. “All records and accounts of receipts and expenditures shall be preserved for at least three years after the date of the election to which the records pertain” and “shall be available for inspection” by the Missouri Ethics Commission. § 130.036.8, RSMo.

49. There is probable cause to believe that Respondents violated §§ 130.036.1 and 130.036.8, RSMo, by failing to maintain the committee’s 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, RSMo, and that Respondent did so knowingly.

## II.

Based on the foregoing, the parties hereto mutually agree and stipulate that the following shall constitute the order entered by the Missouri Ethics Commission in this matter. This order will be effective immediately upon the issuance of the Consent Order of the Missouri Ethics Commission without further action by any party:

1. The parties understand that the Petitioner will maintain this Joint Stipulation as an open and public record of the Missouri Ethics Commission.

2. The Commission shall issue its Consent Order in the form attached hereto as Exhibit A.

a. 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 \$17,493, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$1,749 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 Respondents 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.

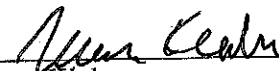
4. Respondents, together with their heirs, successors, and assigns, do hereby waive, release, acquit and forever discharge the Missouri Ethics Commission and its attorneys of or from any liability, claim, actions, causes of action, fees, costs and expenses, and compensation, including but not limited 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:

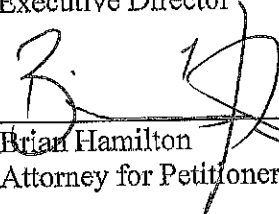
RESPONDENT BERTRAM ATKINS

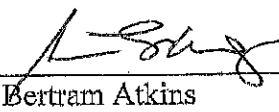
PETITIONER MISSOURI ETHICS  
COMMISSION

By:  3-1-18  
Bertram Atkins Date

By:  3/23/18  
James Klahr Date  
Executive Director

RESPONDENT CITIZENS FOR BERT  
ATKINS

By:  3/23/18  
Brian Hamilton Date  
Attorney for Petitioner

By:  3-1-18  
Bertram Atkins Date

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

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**MAR 23 2018**  
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Commission

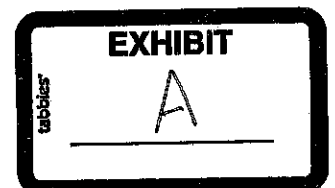
MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	
	)	
BERTRAM ATKINS,	)	Case No. 17-0004-A
	)	
AND	)	
	)	
CITIZENS FOR BERT ATKINS,	)	
	)	
Respondents.	)	

**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 Bertram Atkins and Citizens for Bert Atkins violated Sections 130.031.1, 130.110(1), 130.110(2), 130.041.1, 130.046.1, 130.046.5(2), 130.041.1(6), 130.041.1(3), 130.031.6, 130.041.1(4), 130.041.4, 130.036.1 and 130.036.8, 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 \$17,493, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$1,749 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 Respondents commit 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 Respondents committed such a violation.

SO ORDERED this 23<sup>rd</sup> day of March, 2018

By:



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Don Summers, Chair  
Missouri Ethics Commission