

**BEFORE THE
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,)	
)	
Petitioner,)	
)	
v.)	
)	
VOICES OF DISTRICT 6,)	Case No. 18-0005-I
)	
and)	
)	
CAMERON-DAVID HARTMAN,)	
)	
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, Voices of District 6 and Cameron-David Hartman, 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 Section 105.955, RSMo, in part for the purpose of enforcing the provisions of Chapter 130, RSMo.

2. Respondent Voices of District 6 is a continuing committee established with the Commission in June 2017.

3. Respondent Hartman is the Treasurer for Voices of District 6.

4. Pursuant to Sections 105.957 and 105.961, RSMo, the Commission's staff investigated a complaint filed with the Commission and reported the investigation findings to the Commission.

5. 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 Section 105.961.3, RSMo.

COUNT I

Cash contributions in excess of limits

6. Respondents accepted two cash contributions totaling \$800.00, which exceeded the allowable \$100.00 limit for a cash contribution.

Report	Year	Contributions	Amount	Date
October Quarterly Report	2017	Rob McManus	\$500.00	7/21/2017
October Quarterly Report	2017	Cameron-David Hartman	\$300.00	10/2/2017
Total			\$800.00	

COUNT II

Failure to file a direct expenditure report

7. Respondents reported a \$978.11 expenditure to The Ink Spot, Inc. on October 2, 2017, on the January 2018 Quarterly Report. The stated purpose was for “yard signs” but Respondents failed to list the candidate or ballot measure in support or opposition.

JOINT PROPOSED CONCLUSIONS OF LAW

COUNT I

Cash contributions in excess of limits

8. 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.

9. “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 ... committee.” § 130.031.1, RSMo.

10. There is probable cause to believe that Respondents violated Section 130.031.1, RSMo, by accepting two cash contributions totaling \$800.00, which exceeded the allowable \$100.00 limit for a cash contribution, and that Respondents did so knowingly.

COUNT II

Failure to file a direct expenditure report

11. Pursuant to Section 130.041.1(7), RSMo, committees are required to report “the amount of expenditures for or against a candidate or ballot measure during the period covered and the cumulative amount of expenditures for or against that candidate or ballot measure, with each candidate being listed by name, mailing address and office sought. For the purpose of disclosure reports, expenditures made in support of more than one candidate or ballot measure or both shall be apportioned reasonably among the candidates or ballot measure or both. In apportioning expenditures to each candidate or ballot measure, political party committees and continuing committees need not include expenditures for maintaining a permanent office, such as expenditures for salaries of regular staff, office facilities and equipment or other expenditures not designed to support or oppose any particular candidates or ballot measures[.]”

12. There is probable cause to believe that Respondents violated Section 130.041.1(7), RSMo, by failing to file a Direct Expenditure Report for a \$978.11 expenditure to The Ink Spot, Inc. for yard signs, and that Respondents did so knowingly.

II.

Based on the foregoing, the parties 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 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 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 \$1,800, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$180. 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 ^{Knowingly} 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 be due immediately upon final adjudication finding that any Respondent has committed such a violation.

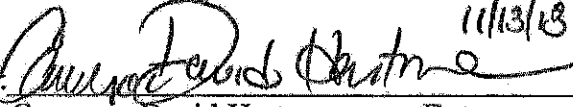
3. The parties consent to the entry of record and approval of this Joint Stipulation and to the termination of any further proceedings before the Commission based upon the Complaint filed by the Petitioner in the above action.

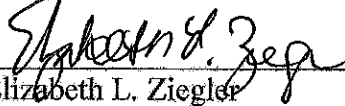
4. Respondents, together with their heirs, successors, and assigns, do hereby waive, release, acquit and forever discharge the Missouri Ethics Commission and its attorneys of or from any liability, claim, actions, causes of action, fees, costs and expenses, and compensation, including but not limited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

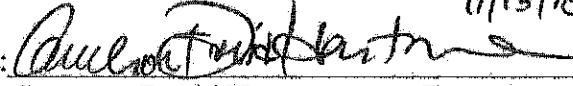
RESPONDENT VOICES OF DISTRICT 6

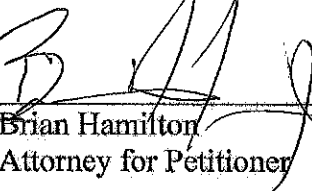
PETITIONER MISSOURI ETHICS
COMMISSION

By:  11/13/18
Cameron-David Hartman Date

By:  11/26/18
Elizabeth L. Ziegler Date
Executive Director

RESPONDENT CAMERON-DAVID
HARTMAN

By:  11/13/18
Cameron-David Hartman Date
Attorney for Respondent

By:  11/26/18
Brian Hamilton Date
Attorney for Petitioner

CASE 18-0005-I

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CAMERON-DAVID HARTMAN,)	
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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, Voices of District 6 and Cameron-David Hartman, violated Sections 130.031.1 and 130.041.1(7), RSMo.


The Commission directs that the Joint Stipulation be adopted.

1. Respondent 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 \$1,800, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$180.00 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.
3. Regardless of the stay in paragraph 2 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 the Respondent who committed the violation

will be required to pay the remainder of the fee. The fee will be due immediately upon final adjudication finding that such Respondent has committed such a violation.

4. Respondents shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 29 day of November,
2018

By: 

Don Summers, Chair
Missouri Ethics Commission