

BEFORE THE  
MISSOURI ETHICS COMMISSION

**Filed**  
**JUL 16 2019**  
Missouri Ethics  
Commission

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	
	)	
MEGAN GREEN,	)	Case No. 19-0005-I
	)	
MEGAN GREEN FOR ST. LOUIS,	)	
	)	
and	)	
	)	
DANNY GLADDEN,	)	
	)	
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, Megan Green, Megan Green for St. Louis, and Danny Gladden, 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 Megan Green was an unsuccessful candidate for Alderperson President for the City of St. Louis, MO for the March 5, 2019 primary election.

3. Respondent Green registered a candidate committee, Megan Green for St. Louis, with the Missouri Ethics Commission on December 8, 2017.

4. Respondent Danny Gladden was listed as the Treasurer on the Statement of Committee Organization for Megan Green for St. Louis.

5. Pursuant to Sections 105.959, RSMo, the Commission's staff has investigated a complaint filed with the Commission and reported the investigation findings to the Commission.

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<sup>1</sup> Unless noted otherwise, all statutory references are to the Revised Statutes of Missouri 2000 (Supp. 2018).

6. Based on the investigation report of the Commission's staff, the Commission determined that there were reasonable grounds to believe that violations of law had occurred, and it therefore authorized a hearing in this matter pursuant to Section 105.961.3, RSMo.

7. Respondents Megan Green, Megan Green for St. Louis, and Danny Gladden failed to report a \$1,500.00 in-kind contribution received on October 8, 2018, from Our Revolution: Mid-Missouri, a continuing committee.

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

8. Respondents are 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 additions, the candidate committee shall make a reasonable effort to obtain and report the employer, or occupation if self-employed or notation of retirement, or 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 contributions;

§130.041.1(3), RSMo.

9. There is probable cause to believe that Respondents Megan Green, Megan Green for St. Louis, and Gladden violated Section 130.041.1(3), RSMo, by failing to report a \$1,500.00 in-kind contribution, 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 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 Green, Megan Green for St. Louis, and Gladden in the amount of \$1,000, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$100 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 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.

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

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, which Respondents or Respondents' attorney may now have or hereafter have, based upon or arising out of the this case.

SO AGREED:

RESPONDENT MEGAN GREEN

By: Megan E. Green 7/2/19  
Megan Green Date

PETITIONER MISSOURI ETHICS  
COMMISSION

By: Elizabeth L. Ziegler  
Elizabeth L. Ziegler Date  
Executive Director

RESPONDENT MEGAN GREEN FOR ST.  
LOUIS

By: Megan E. Green 7/2/19  
Megan Green Date

By: Brian Hamilton 7/16/19  
Brian Hamilton Date  
Attorney for Petitioner

RESPONDENT DANNY GLADDEN

By: Danny Gladden 7/17/2019  
Danny Gladden Date

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**CONSENT ORDER**

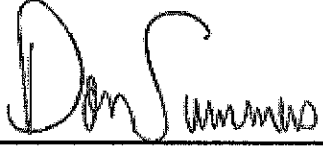
The parties have filed a Joint Stipulation of Facts, Waiver of Hearing, and Proposed Consent Order with the Missouri Ethics Commission. Accordingly, the Missouri Ethics Commission accepts as true the facts stipulated and finds that Respondents violated Section 130.041.1(3), RSMo.

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 Green, Megan Green for the St. Louis, and Gladden in the amount of \$1,000.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$100.00 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 or violations 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 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 16<sup>th</sup> day of July, 2019

By:   
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Don Summers, Chair  
Missouri Ethics Commission