

**BEFORE THE
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,)
)
 Petitioner,)
)
 v.) Case No. 19-0033-I
)
 MEGAN GREEN,)
)
 and)
)
 MEGAN GREEN FOR THE 15TH WARD,)
)
 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 and Megan Green for the 15th Ward, 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.¹

2. Respondent Green is a candidate for Alderperson Ward 15 for the City of St. Louis, Missouri for the March 2021 primary election.

3. Respondent Green registered a candidate committee, Megan Green for the 15th Ward, with the Missouri Ethics Commission on August 4, 2014. The Statement of Committee Organization was last amended on May 1, 2017, updating election date to March 2, 2021.

4. Pursuant to Section 105.959, RSMo, the Commission's staff has investigated a complaint that was filed with the Commission and reported the investigation's findings to the Commission.

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

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

6. Between 2017 through the present, Respondent Megan Green for the 15th Ward entered into leases with Sommer Property Investments, LLC (Sommer) for office space located at 3406 Roger Place in St. Louis, Missouri. All of the leases contained a provision that "this rent amount is offered at a significant discount (regularly \$600/month)."²

7. Sommer leased the property to Respondent Megan Green for the 15th Ward for a reduced amount of \$300.00 per month.

8. In 2017, Respondents failed to timely report six months of in-kind contributions, totaling \$1,800.00, received from Sommer.

9. In 2018, Respondents failed to timely report three months of in-kind contributions, totaling \$900.00, received from Sommer.

10. In 2019, Respondents failed to timely report four months of in-kind contributions, totaling \$1,200.00, received from Sommer.

JOINT PROPOSED CONCLUSIONS OF LAW

11. Pursuant to Section 130.058, RSMo, "the candidate or the committee treasurer of any committee except a candidate committee is ultimately responsible for all reporting requirements pursuant to this chapter."

12. Pursuant to Section 130.041.1(d), RSMo, the candidate "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

² During the months of April and May in 2019, the property was leased by another entity.

section 130.046... each report shall set forth: (d) Total dollar value of all in-kind contributions received[.]”

13. There is probable cause to believe that Respondents violated Section 130.041.1(d), RSMo, by failing to timely report in-kind contributions, totaling \$3,900.00, received in \$300.00 monthly increments, from Sommer.

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. Prior to finalizing settlement, Respondents will be required to file and amend reports with the Commission.
3. 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 Megan Green and Megan Green for the 15th Ward in the amount of \$3,900.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$390.00 of that fee within forty-five days after the date of the Consent 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 3.b above, if the Commission finds that there is probable cause to believe that any Respondent committed 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 a final probable cause finding that such Respondent has committed a violation.~~
 - d. Respondents shall be jointly and severally liable for all fees imposed under this order.

4. 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.

5. 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 this case.

SO AGREED:

RESPONDENT MEGAN GREEN

By: Megan & Brian 1/3/20
Megan Green Date

RESPONDENT MEGAN GREEN FOR THE 15TH WARD

By: Megan & Brian 1/3/20
Megan Green Date

PETITIONER MISSOURI ETHICS COMMISSION

By: Elizabeth L. Ziegler 1/8/20
Elizabeth L. Ziegler Date
Executive Director

By: Brian Hamilton 1/8/2020
Brian Hamilton Date
Attorney for Petitioner

ATTORNEY FOR RESPONDENTS

By: Matt Vianello 1/8/2020
Matt Vianello Date

**BEFORE THE
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,)
)
 Petitioner,)
)
 v.) Case No. 19-0033-I
)
 MEGAN GREEN,)
)
 and)
)
 MEGAN GREEN FOR THE 15TH WARD,)
)
 Respondents.)

CONSENT ORDER

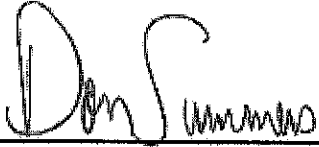
The parties have filed a Joint Stipulation of Facts, Waiver of Hearing, and Proposed Consent Order with the Missouri Ethics Commission. Accordingly, the Missouri Ethics Commission accepts as true the facts stipulated and finds that there is probable cause to believe that Respondents violated Section 130.041.1(d), 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 Megan Green and Megan Green for the 15th Ward in the amount of \$3,900.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$390.00 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 the Commission finds that there is probable cause to believe that any Respondent committed 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 a final probable cause finding that such Respondent has committed a violation.

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

SO ORDERED this 8th day of January, 2020

By: 

Don Summers, Chair
Missouri Ethics Commission