

**BEFORE THE
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,)
)
) Case No. 21-0027-I
)
v.)
)
ROY GROVES,)
)
) Respondent.)

**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 Respondent, Roy Groves, acknowledges that he has received and reviewed a copy of the legal complaint filed by the Petitioner in this case, and he submits to the jurisdiction of the Missouri Ethics Commission.

The undersigned Respondent further acknowledges that he is 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 Respondent be proven upon the record by competent and substantial evidence; the right to cross-examine any witnesses appearing at the hearing against Respondent; the right to present evidence on Respondent's behalf at the hearing; and the right to a decision upon the record of the hearing. Being aware of these rights provided to Respondent by operation of law, the undersigned Respondent knowingly and voluntarily waives each and every one of these rights and freely enters 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 agrees to abide by the terms of this document.

I.

Based upon the foregoing, the Petitioner and the undersigned Respondent 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 (MEC) 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 105, RSMo.

2. During all relevant times, Respondent Roy Groves was and is a member of the Board of Trustees for the Village of Ferrelview (Village) in Platte County, Missouri.

3. During all relevant times, Groves was and is a Village employee.

4. The Village is incorporated under Chapter 80, RSMo.

5. “The corporate powers and duties of every village so incorporated shall be vested in a board of trustees[.]” § 80.040, RSMo.

6. Section 80.090 to Section 80.110, RSMo, establishes and allows the village trustees to pass ordinances and enact some laws.

7. Pursuant to Section 105.961, RSMo, the Commission’s staff investigated a complaint filed with the Commission and reported the investigation findings to the Commission.

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

JOINT PROPOSED CONCLUSIONS OF LAW

9. Pursuant to Section 105.450(9), RSMo, a “political subdivision shall include any political subdivision of the state, and any special district or subdistrict.”

10. Pursuant to Section 105.458.1(1), RSMo: “No member of any legislative or governing body of any political subdivision of the state shall: Perform any service for such political subdivision or any agency of the political subdivision for any consideration other than the compensation provided for the performance of his or her official duties, except as otherwise provided in this section[.]”

11. There is probable cause to believe that Groves violated Section 105.458.1(1), RSMo, by providing services to the Village of Ferrelview, for compensation, while serving on the Village’s Board of Trustees.

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. Respondent shall comply with all relevant sections of Chapter 105, RSMo.

b. Within ninety (90) days following entry of the Consent Order, Respondent will voluntarily resign from either the Board of Trustees or his job with the Village.

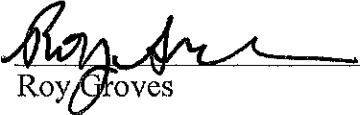
c. It is the order of the Missouri Ethics Commission that having resigned from either the Board of Trustees or his job with the Village, a letter be issued that no further action shall be taken.

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 legal complaint filed by the Petitioner in the above action.

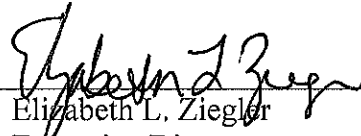
4. Respondent, together with his heirs, successors, and assigns, does hereby waive, release, acquit and forever discharge the Missouri Ethics Commission and its attorneys of or from any liability, claim, actions, causes of action, fees, costs and expenses, and compensation, including but not limited to, a claim for attorney's fees whatsoever which Respondent or Respondent's attorney may now have or which they may hereafter have, which are based upon or arise out of this case.

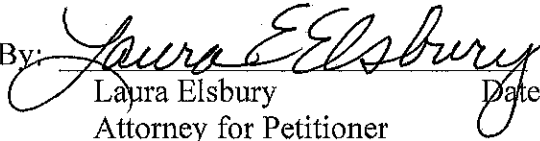
SO AGREED:

RESPONDENT ROY GROVES

By:  _____ Date
Roy Groves

PETITIONER MISSOURI ETHICS
COMMISSION

By:  _____ Date
Elizabeth L. Ziegler
Executive Director

By:  _____ Date
Laura Elsbury
Attorney for Petitioner

Filed
SEP 23 2021
Missouri Ethics
Commission

**BEFORE THE
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,)
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 Petitioner,)
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 v.) Case No. 21-0027-I
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 ROY GROVES,)
)
 Respondent.)

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 Respondent violated Section 105.458.1(1), RSMo.

The Commission directs that the Joint Stipulation be adopted.

1. Respondent shall comply with all relevant sections of Chapters 105, RSMo.
2. Within ninety (90) days following entry of the Consent Order, Respondent will voluntarily resign from either the Board of Trustees for the Village of Ferrelview or his job with the Village.
3. It is the order of the Missouri Ethics Commission that having resigned from either the Board of Trustees or his job with the Village, a letter be issued that no further action shall be taken.

SO ORDERED this 23rd day of September, 2021

By:


Cheryl D. S. Walker, Chair
Missouri Ethics Commission



Missouri Ethics Commission

Elizabeth L. Ziegler
EXECUTIVE DIRECTOR

September 29, 2021

Roy Groves
205 NW Heady Ave.
Ferrelview, MO 64163

RE: Case Number: 21-0027-I

Dear Mr. Groves:

A Letter of No Further Action is issued to you pursuant to the authority granted to the Missouri Ethics Commission in Section 105.961.4(5).

The Commission has accepted the submission of the Joint Stipulation of Facts, Waiver of Hearings Before the Missouri Ethics Commission, and Consent Order with Joint Proposed Findings of Fact and Conclusions of Law in this matter, a copy of which is incorporated herein by reference.

The Commission has found probable cause to believe that you violated Section 105.458.1(1), RSMo, by providing services to the Village of Ferrelview, for compensation, while serving on the Village's Board of Trustees. You have since voluntarily resigned your position on the Board of Trustees for the Village of Ferrelview.

The Commission hereby issues this letter that it will take no further action for violation of Section 105.458.1(1), RSMo.

Sincerely,

A handwritten signature in black ink that reads 'Cheryl D. S. Walker' with a long horizontal flourish extending to the right.

Cheryl D. S. Walker, Chair
Missouri Ethics Commission