

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	
	)	
UNITING MISSOURI PAC,	)	Case No. 21-0003-I
Continuing Committee,	)	
	)	
and	)	
	)	
CHARLOTTE BOYER,	)	
Treasurer,	)	
	)	
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, Uniting Missouri PAC and Charlotte Boyer, acknowledge that they have received and reviewed a copy of the legal 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 (MEC) 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. Uniting Missouri PAC (Uniting Missouri) is a continuing committee that registered with the MEC by filing a Statement of Committee Organization on July 2, 2018.

3. Uniting Missouri amended its Statement of Committee Organization on March 25, 2019, and changed the committee treasurer to Charlotte Boyer.

4. Pursuant to Section 105.961, RSMo, the Commission's staff received a complaint filed with the Commission. The Commission's staff investigated the complaint 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. 2017).

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.

6. On October 2, 2020, Respondents reported receiving a \$150,000 contribution from RAGA Action Fund.

7. RAGA Action Fund is a federal political action committee that is registered with the Federal Election Commission.

8. RAGA Action Fund did not file a Statement of Committee Organization with the MEC.

#### JOINT PROPOSED CONCLUSIONS OF LAW

9. Pursuant to Section 130.031.7, RSMo: “No candidate or committee in this state shall accept contributions from any out-of-state committee unless the out-of-state committee from whom the contributions are received has filed a statement of organization pursuant to section 130.021 or has filed the reports required by sections 130.049 and 130.050, whichever is applicable to that committee.”

10. Section 130.036.2, RSMo, states, “[u]nless a contribution is rejected by the...committee and returned to the donor or transmitted to the state treasurer within ten business days after its receipt, it shall be considered received and accepted on the date received[.]”

11. There is probable cause to believe that Respondents violated Section 130.031.7, RSMo, by accepting a contribution from RAGA Action Fund that did not have a committee registered with the MEC.

## 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 \$2,000.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondent pays \$1,000.00 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 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 fees. The fee will be due immediately upon final adjudication finding that there was probable cause to believe that such Respondent has committed such a violation.
  - d. Respondents shall be jointly and severally liable for all fees imposed under this order.
  - e. By signing this joint stipulation, Respondents are agreeing they have violated the two year provision in case number 20-0005-I. This violation results in the remainder of the fee, \$1,800.00, being due immediately upon the execution of this Joint Stipulation.
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 this 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 this case.

RESPONDENT UNITING MISSOURI PAC

PETITIONER MISSOURI ETHICS  
COMMISSION

By: Charlotte Boyer 10-29-2021  
Charlotte Boyer Date

By: Elizabeth L. Ziegler 11-15-21  
Elizabeth L. Ziegler Date  
Executive Director

RESPONDENT CHARLOTTE BOYER

By: Charlotte Boyer 10-29-2021  
Charlotte Boyer Date

By: Laura Elsbury 11-15-2021  
Laura Elsbury Date  
Attorney for Petitioner

ATTORNEY FOR RESPONDENTS

By: Lowell Pearson 11/12/2021  
Lowell Pearson Date

**Filed**  
**NOV 15 2021**  
Missouri Ethics  
Commission

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION, )  
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UNITING MISSOURI PAC, ) Case No. 21-0003-I  
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CHARLOTTE BOYER, )  
)  
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 Sections 130.031.7, 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 \$2,000.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$1,000.00 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 there is probable cause to believe that 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 be due immediately upon final adjudication finding that there is probable cause to believe such Respondent has committed such a violation.
4. Respondents shall be jointly and severally liable for all fees imposed under this order.

5. By signing this Joint Stipulation, Respondents are agreeing they have violated the two year provision in case number 20-0005-I. This violation results in the remainder of the fee, \$1,800.00, being due immediately upon the execution of this Joint Stipulation.

SO ORDERED this 15th day of November, 2021

By:   
Cheryl D. S. Walker, Chair  
Missouri Ethics Commission