

BEFORE THE  
MISSOURI ETHICS COMMISSION

Filed  
DEC 17 2021  
Missouri Ethics  
Commission

MISSOURI ETHICS COMMISSION, )  
)  
Petitioner, )  
)  
v. )  
)  
STL APPROVES, ) Case No. 21-0045-I  
Campaign Committee, )  
)  
and )  
)  
MIKE PRIDMORE, )  
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, STL Approves and Mike Pridmore, 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. STL Approves first registered as a campaign committee in April of 2019 by filing a Statement of Committee Organization with the MEC.
3. STL Approves filed a termination statement on January 15, 2021.
4. At the time of termination, Mike Pridmore was the treasurer for STL Approves.
5. 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.
6. Based on the investigation report, 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.

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

7. In the Fall of 2019, STL Approves was given access to some canvassing software.
8. STL Approves had access to the canvassing software for about five months.
9. STL Approves rarely used the canvassing software.
10. The monthly cost for the canvassing software was \$19.00.
11. STL Approves did not report the value of the access to the canvassing software in its January 2020 Quarterly Report, and it did not report the value of the access to the canvassing software on its April 2020 Quarterly Report.

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

12. A contribution is “a payment, gift, loan, advance, deposit, or donation of money or anything of value for the purpose of supporting or opposing the nomination or election of any candidate for public office or the qualification, passage or defeat of any ballot measure, or for paying debts or obligations of any candidate or committee previously incurred for the above purposes. A contribution of anything of value shall be deemed to have a money value equivalent to the fair market value.” § 130.011(12), RSMo.

13. Pursuant to § 130.011(19), RSMo, an in-kind contribution is a contribution in a form other than money.

14. Campaign finance disclosure reports must contain information regarding the “[t]otal value of all in-kind contributions received[.]” § 130.041.1(3)(d), RSMo.

15. There is probable cause to believe that Respondents violated Section 130.041.1(3)(d), RSMo, by failing to report the value of the access to the canvassing software.


## 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;

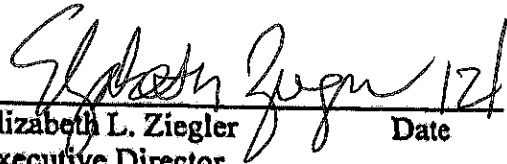
1. The parties understand that the Petitioner will maintain this Joint Stipulation as an open and public record of the Missouri Ethics Commission.
2. The Commission shall issue its Consent Order in the form attached hereto as Exhibit A.
  - a. Respondents shall comply with all relevant sections of Chapter 130, RSMo.
  - b. It is the order of the Missouri Ethics Commission that a Letter of Concern be issued in for failing to report the in-kind contribution.
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. 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:

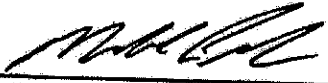
RESPONDENT STL APPROVES

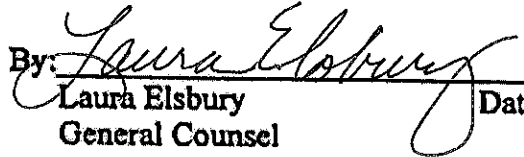
By:  12/14/21  
Mike Pridmore Date

PETITIONER MISSOURI ETHICS  
COMMISSION


By:  12/17/21  
Elizabeth L. Ziegler Date  
Executive Director

RESPONDENT MIKE PRIDMORE

By:  12/14/21  
Mike Pridmore Date

By:   
Laura Elsbury Date  
General Counsel

ATTORNEY FOR RESPONDENTS

By:  12/7/2021  
Christopher Grant Date  
Schuchat, Cook & Werner

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and	)	
	)	
MIKE PRIDMORE,	)	
	)	
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(3)(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 Letter of Concern shall be issued in regard to the failure to report the in-kind contribution.

SO ORDERED this 17<sup>th</sup> day of December, 2021

By:



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Cheryl D. S. Walker, Chair  
Missouri Ethics Commission



# Missouri Ethics Commission

Elizabeth L. Ziegler  
EXECUTIVE DIRECTOR

December 16, 2021

STL Approves, Committee  
Mike Pridmore, Treasurer  
5114 Chouteaus Bluff Dr.  
St. Louis, MO 63111

RE: MEC Case 21-0045-I

Dear Mr. Pridmore:

This Letter of Concern is being issued to you and STL Approves pursuant to the authority granted to the Missouri Ethics Commission in Section 105.961.4(4), RSMo.

The Commission has accepted the proposed Joint Stipulation of Facts, and reached its Conclusions of Law and Order in this matter, a copy of which is marked as Exhibit B, attached hereto and incorporated by reference.

The Commission has found probable cause that you violated Section 130.041.1(3)(d), RSMo, by failing to report the value of access to the canvassing software as an in-kind contribution on a campaign finance report.

The Commission hereby issues this Letter of Concern for failing to report the in-kind contribution.

Sincerely,

Cheryl D. S. Walker, Chair  
Missouri Ethics Commission