

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

**Filed**  
**DEC 20 2021**  
Missouri Ethics  
Commission

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 21-0034-I
	)	
MAURICE HUNT, Candidate,	)	
	)	
and	)	
	)	
MAURICE J HUNT, Candidate	)	
Committee,	)	
	)	
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, Maurice Hunt (Candidate) and Maurice J Hunt (Candidate Committee), 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 Section 105.955, RSMo, in part for the purpose of enforcing the provisions of Chapter 130, RSMo.<sup>1</sup>

2. Maurice Hunt (Hunt) is a City Councilman for the City of Normandy, Missouri and was an unsuccessful candidate for the Mayor of Normandy during the April 6, 2021 election.

3. Respondent Hunt registered a candidate committee, "Maurice J Hunt" (Committee), on March 26, 2021, by filing a Statement of Committee Organization with the MEC. The Statement of Committee Organization shows the office sought as "Mayor/City of Normandy."

4. According to the United States Census Bureau, as of 2019 the population of Normandy was estimated to be 4,838.

5. Pursuant to Section 105.961, RSMo, the Commission's staff investigated a complaint that had been filed with the Commission and reported the findings to the Commission.

---

<sup>1</sup> Unless noted otherwise, all statutory references are to the Revised Statutes of Missouri 2000 (Supp. 2019).

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

### **COUNT I**

#### *Failure to timely file a statement of committee organization*

7. On February 25, 2021, Respondent Hunt used \$1,520.87 of his own funds to purchase printed campaign materials in support of his candidacy.

8. Respondent Hunt failed to file a Statement of Committee Organization on or before March 17, 2021, which is 20 days after he received in-kind contributions and made expenditures in excess of \$1,000.00.

### **COUNT II**

#### *Failure to timely and accurately file contributions received*

9. On March 23, 2021, Respondents received a contribution of \$20.00. Respondents failed to disclose this contribution on any campaign finance disclosure report.

10. On the April 2021 Quarterly Report filed on April 17, 2021, Respondents failed to accurately report the addresses of two contributors, the dates of three contributions, and the type of two contributions (reported as in-kind rather than monetary). Additionally, the contributions were incorrectly characterized as “Contributions Made” rather than as “Contributions Received.”

11. Respondents failed to disclose \$2,790.15 in in-kind contributions from Respondent Hunt.

**COUNT III**

*Failure to timely and accurately report expenditures*

12. On the April 2021 Quarterly Report, Respondents failed to accurately report three expenditures as detailed in the table below. Additionally, the expenditures were each incorrectly characterized as a “Miscellaneous Receipt.”

<b>Name/Purpose</b>	<b>Amount</b>
“company nqprring estimate 33358”	\$163.32
“mark Quick Printing estimate 33310”	\$1,896.08
“i heat mediabroadcasting 1727794385”	\$1,600.00

13. Respondents failed to report four expenditures totaling \$1,400.75 related to campaign materials as detailed in the table below.

<b>Date of Invoice</b>	<b>Description</b>	<b>Amount</b>
02/25/21	door hangers, magnetic car signs, buttons, and yard signs	\$1,520.87
03/05/21	t-shirts and sign stands	\$350.36
03/19/21	door hangers and yard signs	\$481.02
03/25/21	sign stands	\$48.50

**COUNT IV**

*Failure to include an accurate “Paid for by” disclosure*

14. Respondents purchased and distributed door hangers in support of Respondent Hunt’s mayoral candidacy.

15. The door hangers contained the statement “Paid for by the Committee to elect Maurice Hunt, Ann Hawthorne, Treasurer” along the bottom.

16. Because no such committee was registered at the time that the door hangers were purchased and distributed, the “Paid for by” disclosure statement should have instead said “Paid for by Maurice Hunt.”

## **JOINT PROPOSED CONCLUSIONS OF LAW**

### **COUNT I**

#### *Failure to timely file a statement of committee organization*

17. Pursuant to § 130.016.6, RSMo, “No candidate for . . . municipal office in a city of one hundred thousand or less . . . shall be required to file an exemption statement pursuant to this section in order to be exempted from forming a committee and filing disclosure reports required of committees pursuant to this chapter if the aggregate of contributions received or expenditures made by the candidate and any other person with the candidate’s knowledge and consent in support of the person’s candidacy does not exceed one thousand dollars and the aggregate of contributions from any single contributor does not exceed three hundred twenty-five dollars.”

18. Pursuant to § 130.011(12)(a), RSMo, a contribution “includes but is not limited to: (a) A candidate’s own money or property used in support of the person’s candidacy other than expense of the candidate’s food, lodging, travel, and payment of any fee necessary to the filing for public office[.]”

19. An in-kind contribution is a “contribution . . . in a form other than money[.]”  
§ 130.011(19), RSMo.

20. “If any candidate for office listed in subsection 7 of tis section exceeds the [contribution or expenditure] limits specified in subsection 6 of this section, the candidate shall form a committee no later than thirty days prior to the election for which the contributions were received or expended which shall comply with all provisions of this chapter for committees.”

§ 130.016.7, RSMo.

21. Section 130.021.5, RSMo, states that “any candidate who is not excluded from forming a committee in accordance with the provisions of section 130.016 shall file a statement of organization with the appropriate officer within twenty days after the person or organization becomes a committee but no later than the date for filing the first report required pursuant to the provisions of section 130.046.”

22. There is probable cause to believe that Respondents violated § 130.021.5, RSMo, by failing to timely file a Statement of Committee Organization with the MEC after the aggregate of Respondents’ contributions and expenditures towards Respondent Hunt’s campaign for Mayor exceeded \$1,000.00.

## COUNT II

### *Failure to timely and accurately report contributions received*

23. In line with the reporting deadlines contained in § 130.046, RSMo, all committees are required to report receipts for each reporting period including the following:

(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 addition, the candidate committee shall make a reasonable effort to obtain and report the employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received one or more contributions which in the aggregate total in excess of one hundred dollars and shall make a reasonable effort to obtain and report a description of any contractual relationship over five hundred dollars between the contributor and the state if the candidate is seeking election to a state office or between the contributor and any political subdivision of the state if the candidate is seeking election to another political subdivision of the state;

...

(d) Total dollar of all in-kind contributions received;

(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 contribution[.]

§ 130.041.1(3), RSMo.

24. There is probable cause to believe that Respondents violated Section 130.041.1(3), RSMo, by failing to report a monetary contribution, by failing to accurately report several contributions, and by failing to report in-kind contributions.

### COUNT III

#### *Failure to timely and accurately report expenditures*

25. All committees are required to report expenditures at the times and for the periods prescribed in 130.046, including:

(d) The full name and mailing address of each person to whom an expenditure of money or any other thing of value in the amount of more than one hundred dollars has been made, contracted for or incurred, together with the date, amount, and purpose of each expenditure.

§ 130.041.1(4)(d), RSMo.

26. There is probable cause to believe that Respondents violated § 130.041.1(4)(d), RSMo, by failing to accurately report three expenditures and by failing to report four expenditures.

### COUNT IV

#### *Failure to include an accurate "Paid for by" disclosure*

27. "Any person publishing, circulating, or distributing any printed matter relative to any candidate for public office of any ballot measure shall on the face of the printed matter identify in a clear and conspicuous manner the person who paid for the printed matter with the words 'Paid for by' followed by the proper identification of the sponsor pursuant to this section."

§130.031.8, RSMo.

28. "[P]rinted matter' shall be defined to include any pamphlet, circular, handbill, sample ballot, advertisement, including advertisements in any newspaper or other periodical, sign including signs for display on motor vehicles, or other imprinted or lettered material[.]"

§ 130.031.8, RSMo.

29. "In regard to any printed matter paid for by a candidate from the candidate's personal funds, it shall be sufficient identification to print the first and last name by which the candidate is known." § 130.031.8(1), RSMo.

30. There is probable cause to believe that Respondents violated § 130.031.8, RSMo, by failing to include a proper "Paid for by" disclosure statement on door hangers that Respondents purchased and distributed in support of Respondent Hunt's campaign.



## 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 and statements 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 fee is imposed against Respondents in the amount of \$3,100.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$400.00 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 there is probable cause to believe that 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 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.

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 Legal 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 MAURICE J HUNT,  
Candidate Committee

PETITIONER MISSOURI ETHICS  
COMMISSION

By: Maurice J. Hunt 12/10/21 Date  
Maurice Hunt  
By: Elizabeth L. Ziegler 12/20/21 Date  
Elizabeth L. Ziegler  
Executive Director

RESPONDENT MAURICE HUNT

By: Maurice J. Hunt 12/10/21 Date  
Maurice Hunt  
By: Laura Elsbury Date  
Laura Elsbury  
General Counsel

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

**Filed**  
**DEC 20 2021**  
Missouri Ethics  
Commission

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 21-0034-I
	)	
MAURICE HUNT, Candidate	)	
	)	
and	)	
	)	
MAURICE J HUNT, Committee	)	
	)	
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 130.021.5, 130.031.8, 130.041.1(3) and 130.041.1(4)(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 in the amount of \$3,100.00, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$400.00 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.

SO ORDERED this 20<sup>th</sup> day of November, 2021

By:



---

Cheryl D. S. Walker, Chair  
Missouri Ethics Commission