

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

MISSOURI ETHICS COMMISSION,  
Petitioner,

v.

JOSHUA VROMAN

and

COMMITTEE FOR JOSH  
VROMAN FCC,

Respondents.

Case No. 22-0030-I

**Filed**

**JUL 25 2022**

**Missouri Ethics  
Commission**

**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, Joshua Vroman and Committee for Josh Vroman FCC, acknowledges that they have received and reviewed a copy of the legal complaint filed by the Petitioner in this case, and she submits to the jurisdiction of the Missouri Ethics Commission (MEC).

The undersigned Respondents further acknowledges 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 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 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.<sup>1</sup>
2. Respondent Joshua Vroman was a candidate for the Rolla City Council in the April 5, 2022 election.
3. Committee for Joshua Vroman FCC is a candidate committee who registered with the MEC on January 13, 2022.
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. 2019).

5. Based on 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.

6. Respondents purchased and distributed signs in support of Joshua Vroman's candidacy.

7. Respondents paid for the printed campaign material with committee funds when he deposited his own funds into the committee's account.

8. The signs all contained the statement "Paid for by Josh Vroman" along the bottom, but they should also have included the name of the committee and the name and title of the committee treasurer who was serving when the printed matter was paid for.

#### JOINT PROPOSED CONCLUSIONS OF LAW

9. "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.

10. "[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.

11. Section 130.031.8, RSMo. further states the following:

(2) In regard to any printed matter paid for by a committee, it shall be sufficient identification to print the name of the committee as required to be registered by subsection 5 of section 130.021 and the name and title of the committee treasurer who was serving when the printed matter was paid for.

12. There is probable cause to believe that Respondents violated § 130.031:8, RSMo, by failing to include an accurate "Paid for by" disclosure statement on signs that Respondents purchased and displayed.

## 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 130, RSMo,

b. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$100.00, pursuant to Section 105.961.4(6), RSMo. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.

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 complaint filed by the Petitioner in the above action.

4. Respondents, together with their 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 Respondents may now have or which they may hereafter have, which are based upon or arise out of this case;

SO AGREED:

RESPONDENT JOSHUA VROMAN

By: Joshua Vroman 19 July 22  
Joshua Vroman Date

COMMITTEE FOR JOSH VROMAN  
FCC

By: Joshua Vroman 19 July 22  
Joshua Vroman Date

PETITIONER MISSOURI ETHICS  
COMMISSION

By: Elizabeth L. Ziegler  
Elizabeth L. Ziegler Date  
Executive Director

By: Noel DeJarnette 25 July 2022  
Noel DeJarnette Date  
Attorney for Petitioner

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

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Respondents. )

JUL 28 2022

Missouri Ethics  
Commission

Case No. 22-0030-I

**CONSENT ORDER**

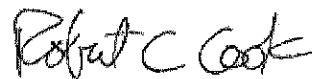
The parties have filed a Joint Stipulation of Facts, Waiver of Hearing, and Proposed Consent Order with the Missouri Ethics Commission. Accordingly, the Missouri Ethics Commission accepts as true the facts stipulated and finds that there is probable cause to believe that Respondents violated Section 130.031.8, RSMo.

The Commission directs that the Joint Stipulation be adopted.

1. Respondent 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 \$100.00, pursuant to Section 105.961.4(6), RSMo. The fee will be paid by check or money order made payable to the Missouri Ethics Commission.

SO ORDERED this 28<sup>TH</sup> day of July, 2022

By:



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Robert Cook, Chair  
Missouri Ethics Commission