



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 stipulates to the following and requests 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. Respondent Kirk Sonnichsen was a candidate in the April 5, 2022, election for Lee's Summit City Council.

3. Respondent Friends of Kirk Sonnichsen is a candidate committee that registered with the MEC on November 27, 2021.

4. 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.

5. Based on the investigation report, the Commission determined that there were reasonable grounds to believe that a violation of the 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. 2020).

6. Respondents paid for and distributed door hangers in support of Sonnichsen's candidacy.

7. The paid for by disclosure statement on the door hangers did not list the name of Respondents' committee and treasurer.

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

8. "Any person publishing, circulating, or distributing any printed matter relative to any candidate for public office or 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.

9. "[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.

10. 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.

11. There is probable cause to believe that Respondent violated Section 130.031.8, RSMo, by failing to include an accurate "paid for by" disclosure statement.

### **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. The Commission shall issue its Consent Order in the form attached hereto as Exhibit B.

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 \$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 Legal Complaint filed by the Petitioner in this action.

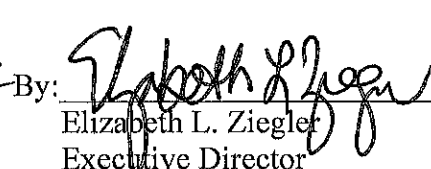
4. Respondents, together with its heirs, successors, and assigns, does hereby waive, release, acquit and forever discharge the Missouri Ethics Commission and its attorneys of or from any liability, claim, actions, causes of action, fees, costs and expenses, and compensation, including but not limited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

SO AGREED:

RESPONDENT FRIENDS OF KIRK  
SONNICHSEN

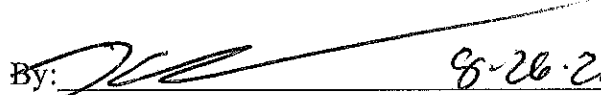
PETITIONER MISSOURI ETHICS  
COMMISSION

By:   
Kirk Sonnichsen Date 8-26-22

By:   
Elizabeth L. Ziegler Date 9/14/22  
Executive Director

RESPONDENT KIRK SONNICHSEN

By:   
Noel DeJarnette Date 9/14/22  
Attorney for Petitioner

By:   
Kirk Sonnichsen Date 8-26-22

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

**Filed**

**SEP 14 2022**

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	Case No. 22-0021-I A
v.	)	
	)	
KIRK SONNICHSEN	)	
and FRIENDS OF KIRK	)	
SONNICHSEN,	)	
	)	
Respondents.	)	

**Missouri Ethics  
Commission**

**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. 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 \$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 14th day of September, 2022

By:



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Robert Cook, Chair  
Missouri Ethics Commission