

**BEFORE THE  
MISSOURI ETHICS COMMISSION**

**Filed**

APR 25 2024

Missouri Ethics  
Commission

MISSOURI ETHICS COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	
	)	Case No. 22-0022-A
COMMITTEE TO ELECT GAIL	)	
GRISWOLD, Candidate Committee,	)	
	)	
and	)	
	)	
GAIL GRISWOLD, Candidate,	)	
	)	
Respondents.	)	

**JOINT FINDINGS OF FACT,  
CONCLUSIONS OF LAW, AND ORDER**

The Missouri Ethics Commission ("MEC"), together with Gail Griswold and Committee to Elect Gail Griswold ("Respondents"), collectively the "parties" jointly stipulate and consent to action as set forth here (the "agreement").

Respondents acknowledge their right to have this agreement reviewed by counsel. Respondents further acknowledge they have received actual notice of the legal complaint filed by the MEC in this case, have reviewed the contents of the Complaint, and submit to the jurisdiction of the Missouri Ethics Commission.

Respondents further acknowledge 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 at a hearing before the MEC; the right to have all allegations against Respondents 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, Respondents knowingly and voluntarily waive each one of these rights and freely enters into this agreement and agrees to abide by its terms.

I.

The parties mutually agree and stipulate, subject to adoption by the Missouri Ethics Commission, the following shall constitute the Findings of Fact and Conclusions of Law in this matter:

**FINDINGS OF FACT**

1. Gail Griswold was a successful candidate as a board member for the Camdenton R-III School District in the April 6, 2021, general election.
2. Committee to Elect Gail Griswold registered as a candidate committee with the Missouri Ethics Commission on March 15, 2021.
3. Pursuant to §§ 105.959 and 105.961, RSMo, the Commission's staff audited the reports and statements filed with the Commission and reported the findings to the Commission.
4. Based on the audit 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 § 105.961.3, RSMo.
5. On December 19, 2022, Respondents untimely filed six quarterly reports.

<b>Report Name</b>	<b>Report Year</b>
July Quarterly Report	2021
October Quarterly Report	2021
January Quarterly Report	2022
April Quarterly Report	2022
July Quarterly Report	2022
October Quarterly Report	2022

6. Respondents failed to file three quarterly reports.

Report Name	Report Year
April Quarterly Report	2023
July Quarterly Report	2023
October Quarterly Report	2023

## CONCLUSIONS OF LAW

7. Pursuant to § 130.046.1(3), RSMo, all committees must file regular campaign finance disclosure reports at the following times and for the following periods: “(3) Not later than the fifteenth day following the close of each calendar quarter.”

8. Pursuant to § 130.046.5(2), RSMo:

No disclosure report needs to be filed for any reporting period if during that reporting period the committee has neither received contributions aggregating more than five hundred dollars nor made expenditure aggregating more than five hundred dollars and has not received contributions aggregating more than three hundred dollars from any single contributor and if the committee’s treasurer files a statement with the appropriate officer that the committee has not exceeded the identified thresholds in the reporting period.

9. There is probable cause to believe Respondents violated §§ 130.046.1(3) and 130.046.5(2), RSMo, by failing to timely file six quarterly reports and failing to file three quarterly reports.

## II.

Based on the foregoing, the parties mutually agree and stipulate, subject to adoption by the Missouri Ethics Commission, the following shall constitute the Order issued by the Missouri Ethics Commission in this matter:

## CONSENT ORDER

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.046.1(3) and 130.046.5(2), RSMo, and pursuant to § 105.961.4, hereby

### ORDERS:

1. Prior to finalizing settlement, Respondents will be required to file and amend reports and statements with the Commission.
2. Respondents shall comply with all relevant sections of Chapter 130.
3. Respondents are assessed a fee in the amount of \$ 1,000, pursuant to § 105.961.4(6), due by check or money order and payable to the Missouri Ethics Commission within sixty (60) days of the issuance of this Order.
4. If Respondents pay \$100 of the assessed fee within forty-five (45) days of the issuance of this Order, the remainder of the fee will be stayed for a period of two years. If Respondents do not commit any further violations of Chapter 130, the remainder of the fee shall be dissolved. If there is probable cause to believe Respondents committed any further violations of the campaign finance laws under the Missouri Constitution or Chapter 130 within the two-year period, the remainder of the fee shall be due immediately upon such a finding.
5. Respondents shall be jointly and severally liable for all fees imposed under this order.

### III.

1. The parties understand the Missouri Ethics Commission will maintain this agreement as an open record of the Commission.

2. This agreement does not bind the Missouri Ethics Commission or restrict the remedies available concerning any violations not expressly detailed here, including any future violations.

3. Each party agrees to pay all of their own fees and expenses incurred as a result of this case, its litigation, and/or its disposition.

4. Respondents, together with their heirs, assigns, agents, representatives and attorneys, do hereby waive, release, acquit and forever discharge the Missouri Ethics Commission, the Commission's respective members, employees, agents and attorneys including former members, employees, agents and attorneys, of, or from any liability, claim, actions, causes of action, fees, costs, expenses and compensation, including, but not limited to, any claim for attorney's fees and expenses, whether or not now known or contemplated, including, but not limited to, any claims pursuant to Section 536.087, RSMo, as amended, or any claim arising under 42 U.S.C. § 1983, which now or in the future may be based upon, arise out of, or relate to any of the matters raised in this case or its litigation or from the negotiation or execution of this Joint Stipulation. The parties acknowledge that this paragraph is severable from the remaining portions of this agreement in that it survives in perpetuity even in the event that any court or administrative tribunal deems this agreement or any portion thereof void or unenforceable.

5. This agreement shall become effective immediately upon (1) the signature of all parties; (2) adoption of the Joint Proposed Findings of Fact, Conclusions of Law by the Missouri Ethics Commission; and (3) issuance of a Final Order by the Commission, without any further action of the parties.

SO AGREED:

RESPONDENTS

Gail Griswold 4/24/24  
Gail Griswold Date

MISSOURI ETHICS COMMISSION

Elizabeth L. Ziegler 4/25/24  
Elizabeth L. Ziegler Date  
Executive Director

ATTORNEY FOR RESPONDENTS

Curtis Tideman  
Curtis Tideman Date  
Lathrop GPM LLP 4/24/24

Brian Hamilton 4/25/25  
Brian Hamilton Date  
Attorney for Petitioner

BEFORE THE  
MISSOURI ETHICS COMMISSION

Filed

APR 26 2024

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Commission

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Petitioner,	)	
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GAIL GRISWOLD, Candidate,	)	
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Respondents.	)	

**CONSENT ORDER**

The Missouri Ethics Commission finds probable cause to believe Respondents violated §§ 130.046.1(3) and 130.046.5(2), RSMo, and pursuant to § 105.961.4, hereby

**ORDERS:**

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4. Respondents shall be jointly and severally liable for all fees imposed under this order.

SO ORDERED this 26th day of April, 2024

*Robin Wheeler Sanders*

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Robin Wheeler Sanders, Chair  
Missouri Ethics Commission