

**BEFORE THE
MISSOURI ETHICS COMMISSION**

Filed

JAN 17 2025

Missouri Ethics
Commission

MISSOURI ETHICS)	
COMMISSION,)	
)	
Petitioner,)	
)	
v.)	Case No. 24-0036-I (A)
)	
CARRIE DIXON)	
Candidate,)	
)	
and)	
)	
CARRIE DIXON FOR ISD)	
Candidate Committee,)	
)	
Respondents.)	

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

The Missouri Ethics Commission (“MEC”), together with Carrie Dixon and Carrie Dixon for ISD (“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. Carrie Dixon was a candidate for school board member of Independence School District in the April 2, 2024, election.
2. Carrie Dixon for ISD is a candidate committee registered with the MEC on January 6, 2024.
3. Pursuant to § 105.961, the MEC's staff investigated a complaint filed with the Commission and reported the investigation findings to the Commission.
4. The Commission determined there were reasonable grounds to believe a violation of the law had occurred and authorized a hearing pursuant to § 105.961.3.
5. Eric Knipp and Dennis Green were also candidates for school board members of Independence School District in the April 2, 2024, election.
6. At all relevant times here, Eric Knipp for ISD and Dennis Green for ISD were candidate committees registered with the MEC.

7. On three (3) separate occasions, Respondents, Knipp for ISD, and Green for ISD purchased shared mailers in support of their candidacies and divided the cost between the three (3) committees as shown below:

Business	Invoice Date	Dixon	Knipp	Green	Total
Maywood Printing	02/29/2024	\$63.20	\$63.21	\$63.20	\$189.61
Maywood Printing	03/13/2024	\$92.10	\$92.09	\$92.10	\$276.29
Service Printing	03/21/2024	\$1,328.57	\$1,328.57	\$1,328.57	\$3,985.71
Totals		\$1,483.87	\$1,483.88	\$1,483.87	\$4,451.61

8. Respondents paid one-third of the cost for each shared mailer which were reported as expenditures on their 8-Day Before April 2, 2024, Election Report.

9. One-third the cost of each mailer, a cost Eric Knipp for ISD and Dennis Green for ISD would have incurred in full otherwise, is something of value given from Respondents.

10. Respondents should have reported the three (3) in-kind contributions made to Eric Knipp for ISD and Dennis Green for ISD on their 8-Day Before April 2, 2024, Election Report but did not.

11. Two-third the cost of each mailer, a cost Respondents would have incurred in full otherwise, is something of value given from Eric Knipp for ISD and Dennis Green for ISD.

12. Respondents should have reported the in-kind contributions from Eric Knipp for ISD and Dennis Green for ISD on their 8-Day Before April 2, 2024, Election Report but did not.

CONCLUSIONS OF LAW

13. Section 130.011(12) defines a contribution to include anything of value for the purpose of supporting the election of a candidate for office.

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

15. Section 130.041.1(8) sets forth the requirements for committees to report receipts for each reporting period on all disclosure reports:

A separate listing by full name and address of any committee including a candidate committee controlled by the same candidate for which a transfer of funds or a contribution in any amount has been made during the reporting period, together with the date and amount of each such transfer or contribution[.]

16. Section 130.041.1(9), RSMo requires committees to report receipts for each reporting period on all disclosure reports, requiring:

A separate listing by full name and address of any committee, including a candidate committee controlled by the same candidate from which a transfer of funds or a contribution in any amount has been received during the reporting period, together with the date and amount of each such transfer or contribution[.]

17. Section 130.041.1(3)(d) requires committees to report receipts for the “total value of all in-kind contributions received.”

18. Where Respondents made three (3) contributions of something of value to Eric Knipp for ISD and Dennis Green for ISD and failed to report them as in-kind contributions made to Eric Knipp for ISD and Dennis Green for ISD; and where Respondents received six (6) contributions of something of value from Eric Knipp for ISD, Dennis Green for ISD and failed to report the in-kind contributions received,

there is probable cause to believe Respondents violated §§ 130.041.1(8), 130.041.1(9), and 130.041.1(3)(d), giving this Commission power to act, as permitted under § 105.961.

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 §§ 130.041.1(8), 130.041.1(9), and 130.041.1(3)(d), RSMo. and pursuant to §105.961.4, hereby **ORDERS**:

1. Respondents shall comply with all relevant sections of Chapter 130.
2. It is the order of the Missouri Ethics Commission that a fee is imposed against Respondents in the amount of \$4,450, pursuant to Section 105.961.4(6), RSMo. However, if Respondents pay \$445 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.
3. Regardless of the stay in paragraph 2 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 fees. 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.
4. 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 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 CARRIE DIXON,
CARRIE DIXON FOR ISD

Carrie Dixon 1/19/24
Carrie Dixon Date

MISSOURI ETHICS COMMISSION

Stacey Heislen 1/17/25
Stacey Heislen Date
Executive Director

Brian Hamilton 1/17/25
Brian Hamilton Date
Attorney for Petitioner

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

SO ORDERED this 23rd day of January, 2025

Robin Wheeler Sanders

Robin Wheeler Sanders, Chair
Missouri Ethics Commission