

STATE ETHICS COMMISSION
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STATE OF SOUTH CAROLINA STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:

CASE NUMBER

C 2022-127

COMPLAINT FORM

COMPLAINANT: State Ethics Commission
ADDRESS: 201 Executive Center Drive
Suite 150
Columbia, SC 29210

RESPONDENT: Sean R. Graham

ADDRESS: [REDACTED]

TELEPHONE NUMBER: (803) 253-4192

TELEPHONE NUMBER: [REDACTED]

TITLE: Anderson County Councilman

Section 8-13-1120, SC Code Ann., 1976, as amended, requires disclosure of the source, type, and amount of income from a governmental entity and a listing of the private source and type of any income received by the filer or a member of the filer's immediate family during the reporting period. Respondent has failed to disclose his private source of income on the 2019, 2020, and 2021 Statements of Economic Interests.

Section 8-13-1140, SC Code Ann., 1976, as amended, requires the filing of an updated Statement of Economic Interests for the previous calendar year annually thereafter prior to March 30. Records in the State Ethics Commission indicate that the Respondent was required to file the 2022 Statement of Economic Interests.

Section 8-13-1308, S.C. Code Ann., 1976, as amended, requires candidates to file Campaign Disclosures within ten (10) days of receiving or expending \$500; fifteen (15) days prior to each election; within ten (10) days of the end of each quarter; and a final report when the campaign account is closed. In addition, certified campaign reports detailing campaign contributions and expenditures must contain the total of contributions accepted, the name and address of each person making a contribution, the total expenditures made by or on behalf of the candidate or committee, and the name and address of each person to whom an expenditure is made from campaign funds. Pursuant to Section 8-13-1362 and Regulation 52-504 (C), the Pre-Election and quarterly report are required even when there have been no contributions or expenditures. Records of the State Ethics Commission indicate that a Pre-Election Campaign Disclosure was due between October 14, 2020 and October 19, 2020. Respondent was sent an email reminder thirty days before the Campaign Disclosure deadline.

Respondent was reminded of the filing requirements by certified letters dated July 8, 2022 as described in the attached. To date, a properly completed 2019 Statement of Economic Interests, 2020 Statement of Economic Interests, 2021 Statement of Economic Interests, 2022 Statement of Economic Interests and Pre-Election Campaign Disclosure have not been received. All in violation of Section 8-13-1120, Section 8-13-1140, Section 8-13-1308(A), Section 8-13-1308(D)(1), and Section 8-13-1308 (F), S.C. Code Ann., 1976, as amended.

If there is a finding of probable cause, the following documents become public record: the complaint, the response (if any) by respondent, and the notice of hearing. If a hearing is to be held, the final order and all exhibits become public record. If no hearing is held following a finding of probable cause, the final disposition of the matter becomes public record.

STATE OF SOUTH CAROLINA
COUNTY OF Richland

Personally appeared before me Meghan L. Walker who, first being duly sworn, says that she has read and knows the contents of the above complaint and that the allegations contained therein, are true and correct to the best of her own knowledge, except for those matters therein based upon information and belief, and as to those she believes them to be true.

Sworn to and subscribed before me this
12th day of October, 2022

[REDACTED]

Meghan L. Walker, Executive Director

[REDACTED]

Notary Public for South Carolina
My Commission expires 01/22/26

SEC-7 (Revised 3/2022)

REPLY TO: 201 Executive Center Drive, Suite 150, Columbia, South Carolina 29210 (803)253-4192
ELECTRONIC COPIES WILL NOT BE ACCEPTED

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
Complaint C2022-127)
Sean R. Graham)
Respondent.)
State Ethics Commission)
Complainant.)

BEFORE THE STATE ETHICS COMMISSION

NOTICE OF HEARING

The State Ethics Commission has determined that there is probable cause pursuant to Section 8-13-320(10)(i), Code of Laws, South Carolina, 1976, as amended, to support the allegations made in the above-captioned complaint. The Commission will convene a formal hearing into the matter in accordance with Section 8-13-320(10)(i) & (j), Code of Laws, South Carolina, 1976, as amended, and State Ethics Commission Regulations, S.C. Code Ann. Regs. 52-707 (1997 Cum. Supp.) on Thursday, June 15, 2023 at 9:30 a.m. at the Commission Hearing Room located at: 201 Executive Center Drive, Suite 150, Columbia, South Carolina 29210.

The following allegations will be heard:

COUNT ONE
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Sean R. Graham, Anderson County Councilmember, did in Richland County, fail to file a 2022 Statement of Economic Interests, in violation of Section 8-13-1140.

COUNT TWO
FAILURE TO REPORT INCOME ON STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1120 S.C. CODE ANN., 1976, AS AMENDED

That Sean R. Graham, Anderson County Councilmember, did in Richland County, fail to report private sources of income on his 2019 Statement of Economic Interests, in violation of

Section 8-13-1120.

COUNT THREE
FAILURE TO REPORT INCOME ON STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1120 S.C. CODE ANN., 1976, AS AMENDED

That at Sean R. Graham, Anderson County Councilmember, did in Richland County, fail to report private sources of income on his 2020 Statement of Economic Interests, in violation of Section 8-13-1120.

COUNT FOUR
FAILURE TO REPORT INCOME ON STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1120 S.C. CODE ANN., 1976, AS AMENDED

That at Sean R. Graham, Anderson County Councilmember, did in Richland County, fail to report private sources of income on his 2021 Statement of Economic Interests, in violation of Section 8-13-1120.

COUNT FIVE
FAILURE TO FILE A PRE-ELECTION CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308, S.C. CODE ANN., 1976, AS AMENDED

That Sean R. Graham, Anderson County Councilmember, did in Richland County, fail to file a Pre-Election Campaign Disclosure report for the June 2020 primary election, in violation of Section 8-13-1308.


COUNT SIX
FAILURE TO FILE A PRE-ELECTION CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308, S.C. CODE ANN., 1976, AS AMENDED

That Sean R. Graham, Anderson County Councilmember, did in Richland County, fail to file a Pre-Election Campaign Disclosure report for the November 2020 general election, in violation of Section 8-13-1308.

You have the right to be represented by counsel, the right to call and examine witnesses, the right to introduce exhibits, and the right to cross-examine opposing witnesses. This hearing

will be open to the public as required by Section 8-13-320(10)(j), Code of Laws, South Carolina, 1976, as amended. The procedures to be followed are set forth in the Administrative Procedures Act, Section 1-23-10, et seq., Code of Laws, South Carolina, 1976 as amended the State Ethics Act, Section 8-13-100, et seq., Code of Laws, South Carolina, 1976, as amended, and State Ethics Commission Regulations, S.C. Code Ann. Regs. 52-707 (1997 Cum. Supp.).

A pre-hearing conference may be scheduled prior to the hearing to allow exchange of witness lists and evidence, marking of exhibits, and disposition of motions or pleadings. In the event you fail to appear, judgment by default will be rendered against you. If there are any questions concerning the above notice or hearing times, please contact the State Ethics Commission.


Meghan L. Walker, Executive Director
State Ethics Commission

Dated this 30th day,
of January 2023.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the Sean R. Graham, PO Box 623, Starr, SC 29684 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 23rd day of January 2023, by **CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED**, appropriate postage affixed, and a return address clearly indicated on said envelope.



Rachael O'Bryan, Administrative Assistant

Columbia, South Carolina

State Ethics Commission

(803) 253-4192

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

IN THE MATTER OF:)
COMPLAINT C2022-127)

State Ethics Commission,)
Complainant.)

Sean R. Graham,)
Respondent.)
_____)

BEFORE THE STATE ETHICS COMMISSION

DECISION AND ORDER

This matter comes before the State Ethics Commission (Commission) by way of a complaint filed on October 12, 2022. Pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act of 1991 (Ethics Act), the Commission reviewed the above-captioned complaint against Sean R. Graham (Respondent) and probable cause was found to warrant an evidentiary hearing. Present at the hearing on June 15, 2023, were Commissioners Bryant S. Caldwell, Mary Hunter B. Tomlinson, and F. Xavier Starkes, Hearing Chair. Respondent appeared *pro se*. Complainant was represented by Courtney M. Laster, Esq. The following charges were considered:¹

COUNT ONE
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Sean R. Graham, Anderson County Councilmember, did in Richland County, fail to file a 2022 Statement of Economic Interests, in violation of Section 8-13-1140.

COUNT TWO
FAILURE TO REPORT INCOME ON STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1120 S.C. CODE ANN., 1976, AS AMENDED

That Sean R. Graham, Anderson County Councilmember, did in Richland County, fail to

¹ At the call of the case, Commission staff moved to dismiss Count Five (5) in the Notice of Hearing. Count Five (5) was for failure to file a 2020 Primary Pre-Election Campaign Disclosure Report. According to Commission staff, this primary election was cancelled due to lack of opposition. The Panel therefore dismissed Count Five (5) and the hearing proceeded on Counts One (1), Two (2), Three (3), Four (4), and Six (6).

report private sources of income on his 2019 Statement of Economic Interests, in violation of Section 8-13-1120.

COUNT THREE
FAILURE TO REPORT INCOME ON STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1120 S.C. CODE ANN., 1976, AS AMENDED

That at Sean R. Graham, Anderson County Councilmember, did in Richland County, fail to report private sources of income on his 2020 Statement of Economic Interests, in violation of Section 8-13-1120.

COUNT FOUR
FAILURE TO REPORT INCOME ON STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1120 S.C. CODE ANN., 1976, AS AMENDED

That at Sean R. Graham, Anderson County Councilmember, did in Richland County, fail to report private sources of income on his 2021 Statement of Economic Interests, in violation of Section 8-13-1120.

COUNT SIX
FAILURE TO FILE A PRE-ELECTION CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308, S.C. CODE ANN., 1976, AS AMENDED

That Sean R. Graham, Anderson County Councilmember, did in Richland County, fail to file a Pre-Election Campaign Disclosure report for the November 2020 general election, in violation of Section 8-13-1308.

FINDINGS OF FACT

Having carefully reviewed the evidence presented, the Commission finds as fact:

1. Respondent served on Anderson County Council from 2016 until December 2022.
2. Prior to the filing of the Complaint, Respondent's most recent election was November 3, 2020.
Respondent failed to file a Pre-Election CDR prior to this election.
3. Respondent filed his 2019 Statement of Economic Interests (SEI) on May 9, 2019, but did not report any private sources of income therein.

4. Respondent filed his 2020 SEI on March 31, 2020, but did not report any private sources of income therein.
5. Respondent filed his 2021 SEI on March 17, 2022, but did not report any private sources of income therein.
6. Respondent failed to file a 2022 SEI on or before March 30, 2022.
7. In a July 8, 2022 certified letter, the Commission notified Respondent of his failure to timely file a 2020 Pre-Election CDR and a 2022 SEI and of the requirement to report private sources of income on his 2019, 2020, and 2021 SEIs.
8. According to the United States Postal Service, the letter was delivered to Respondent's address of record on July 18, 2022 at 2:01 p.m.
9. On July 28, 2022, late-filing penalties began to accrue at \$20.00 per day (\$10.00 per report).
10. On August 7, 2022, late-filing penalties began to accrue at \$200.00 per day (\$100.00 per report).
11. On October 18, 2022, Respondent filed HIS 2022 SEI and 2020 Pre-Election CDR. Respondent's Pre-Election CDR reflected no campaign activity.
12. At the time of filing, Respondent had accrued \$10,000.00 in late-filing penalties (\$5,000.00 per report).
13. On December 14, 2022, after receiving assistance from Commission staff, Respondent amended his 2019, 2020, and 2021 SEIs to reflect private sources of income.
14. During the June 15, 2023 hearing, Respondent testified it was not his intention to hide anything from the Commission or the public.

CONCLUSIONS OF LAW

Based upon the Findings of Fact, the Commission concludes, as a matter of law:

1. At all times relevant, Respondent was a "candidate" pursuant to Section 8-13-1300(4) and a "public official" pursuant to Section 8-13-100(27). Therefore, the Commission has personal and subject

matter jurisdiction.

2. Section 8-13-1308(A) provides, in relevant part:

. . . a candidate who does not receive or expend campaign contributions totaling an accumulated aggregate of five hundred dollars or more must file an initial certified campaign report fifteen days before an election.

3. Section 8-13-1140 provides, in relevant part:

A person required to file a [SEI] under this chapter annually shall file . . . an updated statement for the previous calendar year, no later than noon on March 30 . . .

4. Section 8-13-1120(A)(10) requires public officials to disclose, in each SEI:

a listing of the private sources of income received in the previous year by the filer or a member of his immediate family.

5. Section 8-13-1510(A) provides, in relevant part:

. . . a person required to file a report or statement under this chapter who files a late statement or report . . . must be assessed a civil penalty as follows: (1) a fine of one hundred dollars if the statement or report is not filed within five days after the established deadline provided by law in this chapter; and (2) after notice has been given by certified or registered mail that a required statement or report has not been filed, a fine of ten dollars per calendar day for the first ten days after notice has been given, and one hundred dollars for each additional calendar day in which the required statement or report is not filed, not exceeding five thousand dollars.

6. Section 8-13-320(10)(l) allows the Commission to require a public official to pay a civil penalty up to \$2,000 for each violation of the Ethics Act.

7. Section 8-13-130 allows the Commission to “levy an enforcement or administrative fee on a person who is in violation” of the Ethics Act.

DECISION

NOW, THEREFORE, based on the foregoing Findings of Fact and Conclusions of Law, the Panel has determined, based on a preponderance of evidence, that Respondent Sean R. Graham is in violation of one (1) count of 8-13-1140 for failing to timely file a 2022 SEI, three (3) counts of Section 8-13-1120(A)(10) for failing to report private sources of income on his 2019, 2020, and 2021 SEIs, and one (1) count of Section 8-13-1308 for failing to file a 2020 Pre-Election CDR.

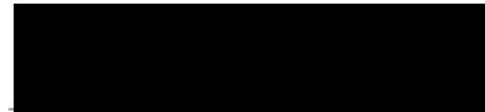
THEREFORE, Respondent is hereby Publicly Reprimanded and assessed a reduced late-filing penalty of \$2,000.00 (\$1,000.00 for the SEI and \$1,000.00 for the Pre-Election CDR); a reduced civil penalty of \$1,500.00 for his failure to report private sources of income on his 2019, 2020, and 2021 SEIs, and an administrative fee of \$760.00, for a total of \$4,260.00.

AND, pursuant to Section 8-13-320 of the Ethics Act, if the \$4,260.00 is not paid within ninety (90) days from Respondent's receipt of this Order, a judgment shall be entered against Respondent. In the event of a failure to pay, upon the Commission's filing of said Judgment with the Clerk of Court's Office in the County of Respondent's last known residence, the Clerk of Court shall enter this Order in the full amount of \$16,760.00, less any money paid, in its Judgment Rolls, without cost to the Commission.

FINALLY, Respondent Sean R. Graham has ten (10) days from receipt of this Order to appeal this Decision and Order to the full Commission.

AND IT IS SO ORDERED THIS 21 DAY OF September 2023.

STATE ETHICS COMMISSION



F. XAVIER STARKES, HEARING CHAIR

Columbia, South Carolina

SC State Ethics Commission

201 Executive Center Dr, Suite 150
Columbia SC 29210

VIA EMAIL AND U.S. POSTAL SERVICE

RE: Complaint C2022-127

To Whom it May Concern:

Please let this letter serve as my intent to appeal the decision resulting from the hearing held on June 15, 2023. I am requesting consideration in removing any and all fines, fees, etc. from the results of this hearing.

I served on the Anderson County Council, not in Richland County as the order states, for the past six (6) years. During that time, I received wages in the amount of approximately \$225.00 bi-weekly by direct deposit into my checking account. I put forth an extreme amount of time serving the citizens of Anderson County in which I was not compensated for financially. I served on multiple committees, serving on the board of the ACOG, and serving on the Board of SC Association of Counties. I also served on several committees within these boards. I did these things with no financial compensation and actually was done at a cost to my family trying to give back to my community. I spend a large amount of time away from my family missing family events because I was elected to serve the people of Anderson County.

I do not believe serving on Council is an opportunity for financial growth or opportunity. It is an opportunity of trying to leave things better than how you found them, pave paths and being a voice for those who do not always have a voice in our community.

As I look back, I do not regret giving my time to serve for those in my community and county; however, I do not believe I should be penalized for stepping up and serving the citizens of my county. There was absolutely no misrepresentation or misleading information giving to the Ethics Commission, it was simply an error on my part of not filing proper paperwork. At no point was there any illegal transaction or information shared. It was strictly an oversight on filing the correct paperwork. While I understand this system is in place to insure people do not mislead the citizens they are sworn to protect and represent, I do not feel there was any misdoings on my part other than not knowing what and how to file out the paperwork. If you can pull the call logs or talk with any of the staff, you will see that I have called numerous times trying to get proper information filed and for whatever reason always seemed to miss some type of deadline or filing. I also attempted to log into the online system numerous times and could not log in, therefore, I had to call the office and usually wait for a return phone call to get the information needed in order to file the paperwork.

Being on County Council for Anderson County was not my main job or the only thing that occupied my day even though I typically spent well over 40 hours a week answering phone calls, text messages, meetings, and dealing with other complaints by the citizens of my county. The compensation is not where it needs to be in Anderson County for the hours worked but I did the best that I could. I also was not completely familiar with all the paperwork or forms that needed to be filed but attempted to get information when I could from your office and file documents to the best of my ability.

I ask that you please reconsider the penalties and fines assessed against me. I have already paid fines in the amount of \$300.00 and thought this was all that needed to be paid. The penalties assessed at this hearing was more than half of what was made in a year from being on county council and I do not feel this is the proper punishment for this action. I, at no time, attempted to mislead or misinform the state's ethics committee but simply didn't meet deadlines when I was unsure as to what paperwork needed to be filed.

Thank you in advance for your consideration on this request moving forward.

Best Regards,

Sean Ray Graham

7/10/23

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
Complaint C2022-127)
State Ethics Commission,)
APPELLATE.)
Sean R. Graham,)
APPELLANT.)

BEFORE THE STATE ETHICS COMMISSION

NOTICE OF APPELLATE HEARING

Sean R. Graham served a Motion for an Appeal on the State Ethics Commission on July 11, 2023. The State Ethics Commission will, therefore, convene a formal appellate hearing into the matter, in accordance with State Ethics Commission Regulations, 52 S.C. Code Ann. Regs. 802 (2013 Cum. Supp.) on September 21, 2023 at 9:30 a.m. at the State Ethics Commission Hearing Room located at: 201 Executive Center Drive Suite 150, Columbia, South Carolina 29210.

Pursuant to 52 S.C. Code Ann. Regs. 803, the Appellant shall file any additional briefs within ten (10) days of the date of service of this notice. In the event the Appellant fails to appear, he will have waived his hearing and judgment will stand.


Meghan Walker Dayson
Executive Director

Dated this 1st day,
of August 2023.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF APPELLATE HEARING** was duly served on the Respondent Sean R. Graham, PO Box 623, Starr, SC 29684 by depositing said **NOTICE OF APPELLATE HEARING** in the United States mail, Columbia, South Carolina on this 7nd day of August 2023, by **CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED**, appropriate postage affixed, and a return address clearly indicated on said envelope.



Columbia, South Carolina
Rachael O'Bryan, Administrative Assistant
State Ethics Commission (803) 253-4192

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
COMPLAINT C2022-127)
State Ethics Commission,)
Respondent.)
Sean R. Graham,)
Appellant.)
_____)

BEFORE THE STATE ETHICS COMMISSION

APPEAL ORDER

This matter comes before the State Ethics Commission (Commission) by way of a Request for an Appeal filed by Sean R. Graham (Appellant) to appeal the Decision and Order (Decision) of the Commission Hearing Panel (Hearing Panel). Present at the Appeal Hearing held on September 21, 2023, were Commissioners AJ Holloway, Brandolyn Thomas Pinkston, Matthew N. Tyler, and Scott E. Frick, Appellate Panel Chair.¹ Appellant appeared *pro se* and the Commission was represented by Courtney M. Laster, Esq.

FACTS

On June 15, 2023, pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act (the Act), the Hearing Panel received testimony in the above-captioned complaint charging Appellant with the following²: (1) failure to file a 2022 Statement of Economic Interests (SEI) in violation of Section 8-13-1140; (2) failure to report private sources of income on his 2019 SEI in violation of Section 8-13-1120; (3) failure to report private sources of income on his 2020 SEI in violation of Section 8-13-1120; (4) failure to

¹ Pursuant to S.C. Code Regs. Ann. 52-805, Commissioners F. Xavier Starkes, Bryant S. Caldwell, and Mary Hunter B. Tomlinson did not participate because they served on the original Hearing Panel.

² At the call of the case, Commission staff moved to dismiss Count Five (5) in the Notice of Hearing. Count Five (5) was for failure to file a 2020 Primary Pre-Election Campaign Disclosure Report. According to Commission staff, this primary election was cancelled due to lack of opposition. The Panel therefore dismissed Count Five (5) and the hearing proceeded on Counts One (1), Two (2), Three (3), Four (4), and Six (6).

report private sources of income on his 2021 SEI in violation of Section 8-13-1120; and (5) failure to file a Pre-Election Campaign Disclosure Report (CDR) for the November 2022 general election in violation of Section 8-13-1308. Ultimately, the Hearing Panel found Appellant in violation of all five (5) counts and assessed a reduced late-filing penalty of \$2,000.00 for Respondent's failure to timely file his 2022 SEI and 2022 Pre-Election CDR (\$1,000.00 for each filing), a reduced civil penalty of \$1,500.00 for Respondent's failure to report private sources of income on his 2019, 2020, and 2021 SEIs (\$500.00 for each SEI), and an administrative fee of \$760.00, for a total of \$4,260.00. The Hearing Panel ordered that this amount be paid to the Commission within ninety (90) days or the amount owed would revert to \$16,760.00, the maximum penalty permitted under the Act. Appellant timely filed a request for an appeal.

The Appellant now asks the Appellate Panel for a reduction of the assessed penalties and fees. Appellant does not dispute liability and admits responsibility for his failure to comply with the requirements of the Act.

DECISION

NOW, based on the information presented by the Appellant, the Appellate Panel affirms the Hearing Panel's Decision and Order and orders Respondent to pay a reduced late-filing penalty of \$2,000.00 (\$1,000.00 for the SEI and \$1,000.00 for the Pre-Election CDR); a reduced civil penalty of \$1,500.00 for his failure to report private sources of income on his 2019, 2020, and 2021 SEIs (\$500.00 for each SEI); and an administrative fee of \$760.00, for a total of \$4,260.00.

Pursuant to Section 8-13-320 of the Act, if the amount of \$4,260.00 is not paid within the specified time period, a judgment in the original amount of \$16,760.00 shall be entered against Respondent. In the event of a failure to pay, upon the Commission's filing of said Judgment with the Clerk of Court in Respondent's last known County of residence, the Clerk of Court shall enter

this Order in the amount of \$16,760.00 in its Judgment Rolls, less any monies paid, without cost to the Commission.

FINALLY, in accordance with Section 8-13-320(10)(m), this review is the final disposition of this matter before the Commission.

AND IT IS SO ORDERED THIS 21st DAY OF October 2023.

STATE ETHICS COMMISSION



SCOTT E. FRICK, APPELLATE PANEL
CHAIR

Columbia, South Carolina