

STATE OF SOUTH CAROLINA
STATE ETHICS COMMISSION

STATE ETHICS COMMISSION
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FOR COMMISSION USE ONLY:
CASE NUMBER
C 2023-114

COMPLAINT FORM

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

RESPONDENT: Jennifer T. Garrett
ADDRESS: [REDACTED]
TELEPHONE NUMBER: [REDACTED]

TELEPHONE NUMBER: (803) 253-4192

TITLE: Candidate – Laurens County Council

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 Campaign Disclosure was due no later than October 10, 2019, January 10, 2020, April 10, 2020, July 10, 2020, October 10, 2020, January 10, 2021, April 10, 2021, July 10, 2021, October 10, 2021, January 10, 2022, April 10, 2022, July 10, 2022, October 10, 2022, January 10, 2023, April 10, 2023, and July 10, 2023. Respondent was sent an email reminder thirty days before each Campaign Disclosure deadline from July 10, 2020 through October 2021 and was sent an email reminder thirty days before and ten days before each Campaign Disclosure deadline after October 2021.

Respondent was reminded of the filing requirements by letters dated March 24, 2023 and April 4, 2023 as described in the attached. To date, a properly completed Quarter 3 2019, Quarter 4 2019, Quarter 1 2020, Quarter 2 2020, Quarter 3 2020, Quarter 4 2020, Quarter 1 2021, Quarter 2 2021, Quarter 3 2021, Quarter 4 2021, Quarter 1 2022, Quarter 2 2022, Quarter 3 2022, Quarter 4 2022, Quarter 1 2023, and Quarter 2 2023 Campaign Disclosure have not been received. All in violation of Section 8-13-1308(B) 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 Walker Dayson 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
14th day of September, 2023

[REDACTED]
Meghan Walker Dayson, 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

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STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND) BEFORE THE STATE ETHICS COMMISSION
))
IN THE MATTER OF:))
))
Complaint C2023-114))
))
State Ethics Commission) **NOTICE OF HEARING**
Complainant.))
))
Jennifer T. Garrett))
Respondent.))
_____)

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, 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, August 15, 2024 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 A CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to file a Quarter 3 2019/Final Campaign Disclosure Report (CDR), in violation of Section 8-13-1308(B).

COUNT TWO
FAILURE TO FILE TO REPORT CAMPAIGN CONTRIBUTION
SECTION 8-13-1308(F)(1), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County,

fail to report an April 24, 2019 contribution from Tammy R. Rook in the amount of \$250.00, in violation of Section 8-13-1308(F)(1).

COUNT THREE
FAILURE TO FILE TO REPORT CAMPAIGN CONTRIBUTION
SECTION 8-13-1308(F)(1), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report five (5) contributions totaling \$148.86 on her 2019 Pre-Election CDR, in violation of Section 8-13-1308(F)(1).

COUNT FOUR
FAILURE TO FILE TO REPORT CAMPAIGN CONTRIBUTION
SECTION 8-13-1308(F)(1), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report one (1) contribution totaling \$20.00 on her Quarter 3 2019/Final CDR, in violation of Section 8-13-1308(F)(1).

COUNT FIVE
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a March 6, 2019 expenditure to Harland Clarke in the amount of \$26.35, in violation of Section 8-13-1308(F)(3).

COUNT SIX
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a March 22, 2019 expenditure to for bank service fee in the amount of \$8.00, in violation of Section 8-13-1308(F)(3).

COUNT SEVEN
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report an April 22, 2019 expenditure to for bank service fee in the amount of \$8.00, in violation of Section 8-13-1308(F)(3).

COUNT EIGHT
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a May 10, 2019 expenditure to Walmart in the amount of \$11.12, in violation of Section 8-13-1308(F)(3).

COUNT NINE
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a May 16, 2019 expenditure for loan repayment in the amount of \$325.00, in violation of Section 8-13-1308(F)(3).

COUNT TEN
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a May 20, 2019 expenditure to City of Laurens in the amount of \$25.50, in violation of Section 8-13-1308(F)(3).

COUNT ELEVEN
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County,

fail to report a May 22, 2019 expenditure to for bank service fee in the amount of \$8.00, in violation of Section 8-13-1308(F)(3).

COUNT TWELVE
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a May 29, 2019 expenditure to SC Republican for filing fees in the amount of \$318.11, in violation of Section 8-13-1308(F)(3).

COUNT THIRTEEN
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a May 29, 2019 expenditure to Walmart in the amount of \$58.70, in violation of Section 8-13-1308(F)(3).

COUNT FOURTEEN
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a May 30, 2019 expenditure to SC Republican PA in the amount of \$300.00, in violation of Section 8-13-1308(F)(3).

COUNT FIFTEEN
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a June 3, 2019 expenditure to USPS in the amount of \$21.10, in violation of Section 8-13-1308(F)(3).

COUNT SIXTEEN
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a June 3, 2019 expenditure to United Community Bank in the amount of \$120.00, in violation of Section 8-13-1308(F)(3).

COUNT SEVENTEN
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a June 5, 2019 expenditure to Ingles for gas in the amount of \$37.02, in violation of Section 8-13-1308(F)(3).

COUNT EIGHTEEN
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a June 6, 2019 expenditure to the Coff in the amount of \$6.18, in violation of Section 8-13-1308(F)(3).

COUNT NINETEN
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a June 24, 2019 expenditure to for bank service fee in the amount of \$8.00, in violation of Section 8-13-1308(F)(3).

COUNT TWENTY
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County,

fail to report a July 23, 2019 expenditure to for bank service fee in the amount of \$8.00, in violation of Section 8-13-1308(F)(3).

COUNT TWENTY-ONE
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That at Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report an August 22, 2019 expenditure to for bank service fee in the amount of \$8.00, in violation of Section 8-13-1308(F)(3).

COUNT TWENTY-TWO
FAILURE TO FILE TO REPORT CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(3), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to report a September 19, 2019 expenditure withdrawing the balance of the campaign account in the amount of \$43.55, in violation of Section 8-13-1308(F)(3).

COUNT TWENTY-THREE
FAILURE TO MAINTAIN CAMPAIGN RECORDS
SECTION 8-13-1302(B), S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to maintain campaign records for four (4) years, in violation of Section 8-13-1302(B).

COUNT TWENTY-FOUR
FAILURE TO PROPERLY DISBURSE UNEXPENDED CAMPAIGN FUNDS
SECTION 8-13-1370, S.C. CODE ANN., 1976, AS AMENDED

That Jennifer T. Garrett, candidate for Laurens County Council, did in Richland County, fail to properly disburse unexpended campaign funds when closing the campaign bank account, in violation of Section 8-13-1370.

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 Walker Dayson, Executive Director
State Ethics Commission

Dated this 16th day,
of May 2024.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the RESPONDENT Jennifer T. Garrett, 980 Westwood Drive, Laurens, SC 29360 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 1st day of May 2024, by CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED, appropriate postage affixed, and a return address clearly indicated on said envelope.



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

Columbia, South Carolina

STATE OF SOUTH CAROLINA)
 COUNTY OF RICHLAND)
)
 IN THE MATTER OF:)
 COMPLAINT C2023-114)
)
 State Ethics Commission,)
 Complainant,)
)
 Jennifer T. Garrett,)
 Respondent.)
 _____)

BEFORE THE STATE ETHICS COMMISSION

CONSENT ORDER

This matter comes before the State Ethics Commission (Commission) by way of a Complaint filed on September 14, 2023. Pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act (Ethics Act), the Complaint against Jennifer T. Garrett (Respondent) was considered by the Commission and probable cause was found to warrant an evidentiary hearing. Prior to the call of the case, Respondent agreed to the following:

STATEMENTS OF FACT

1. Respondent was an unsuccessful candidate for Laurens County Council, in a July 9, 2019 election.
2. Prior to the filing of the Complaint, Respondent’s most recently filed Campaign Disclosure Report (CDR) was a 2019 Quarter 2 CDR filed on July 9, 2019 showing a balance of \$193.96 in on-hand contributions. Respondent thereafter failed to file any additional CDRs.
3. In a March 24, 2023 certified letter, the Commission notified Respondent of her failure to timely file a Quarter 3 2019 CDR, which was due on or before October 10, 2019.
4. On March 31, 2023, the certified letter was returned as “Return to Sender – Not Deliverable as Addressed.”
5. On April 4, 2023, the penalty letter was re-mailed via certified mail to Respondent’s updated address according to the South Carolina Department of Motor Vehicles - 980 Westwood Drive, Laurens, South Carolina.
6. According to the United States Postal Service (USPS), the certified letter was delivered on April

6, 2023 at 11:32 a.m.

7. On April 11, 2023, Respondent contacted the Commission via telephone. Lindsey New, an employee in the Commission's Non-Compliance Department, spoke with Respondent about the penalty letter and transferred Respondent to Erin Caughman, a Commission employee in the Disclosure Department, for assistance with filing.
8. Respondent advised Caughman that the email address she used to create her account within the Commission's filing system was no longer active and, therefore, she was unable to log in. Caughman subsequently made a request to Tyler Technologies, the system vendor, to update Respondent's email address.
9. On April 16, 2023, late-filing penalties began to accrue at \$10.00 per day.
10. On April 18, 2023, Caughman emailed Respondent and advised that she could now access to her Commission account using the updated information. According to Respondent, she did not receive this email.
11. On April 26, 2023, late-filing penalties began to accrue at \$100.00 per day.
12. On July 24, 2023, Rachael O'Bryan, an employee in the Commission's Legal Department, attempted to telephone Respondent, but was unable to leave a voicemail.
13. On July 28, 2023, O'Bryan emailed Respondent and advised that Respondent had still not filed any CDRs. O'Bryan advised Respondent that she had five (5) business days to file the necessary reports or a Complaint action could be initiated.
14. On July 30, 2023, Respondent replied to O'Bryan as follows:

I really am trying to get this in order. I requested information on the username and password a few months ago so I can address these issues but haven't heard back. I have moved twice since the election and have no idea what my log in was or where the info might be. If you can help me resolve this I would be so grateful.
15. On July 31, 2023, O'Bryan replied to Respondent's email and advised her that Martha Jones, a

Commission employee in the Disclosure Department, was able and willing to assist Respondent with logging in and completing her filings. According to Respondent, she did not receive this email.

16. On July 31, 2023, Jones emailed Respondent with her login information. According to Respondent, she did not receive this email.
17. On September 14, 2023, the Complaint was filed.
18. On October 11, 2023, a Commission Investigator contacted Respondent. Respondent advised the Investigator that her campaign bank account was closed and that she believed her filing requirements ended when she lost the election and closed her campaign bank account.
19. A subsequent review of Respondent's campaign bank account records revealed Respondent closed her campaign bank account on September 19, 2019 when she withdrew \$43.55 in cash.
20. On May 29, 2024, Respondent came into compliance by filing a Quarter 3 2019/Final CDR. At the time Respondent came into compliance, she had accrued \$5,000.00 in late-filing penalties.

CONCLUSIONS OF LAW

Based upon the Statements 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). Therefore, the Commission has personal and subject matter jurisdiction.
2. Section 8-13-1308(B) provides, in relevant part:

Following the filing of an initial certified campaign report, additional certified campaign reports must be filed within ten days following the end of each calendar quarter in which contributions are received or expenditures are made, whether before or after an election until the campaign account undergoes final disbursement pursuant to the provisions of Section 8-13-1370.

3. Section 8-13-1370(A) provides, in relevant part:

Contributions received by a candidate that are in excess of expenditures during an election cycle must be used by the candidate upon final disbursement: (1) to defray ordinary and necessary expenses incurred in connection with his duties in his public office; (2) to be

contributed to an organization exempt from tax under Section 501(c)(3) of the Internal Revenue Code of 1986, a political party, or a committee; (3) to be maintained in the campaign account for a subsequent race for the same elective office; (4) to further the candidacy of the individual for a different elective office. However, after December 31, 1992, the funds must be used in a campaign for a different elective office only as provided for in Section 8-13-1352; (5) to be returned pro rata to all contributors; (6) to be contributed to the state's general fund; or (7) to be distributed using a combination of these options.

4. 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.

5. 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.

6. Section 8-13-320(10)(l) allows the Commission to assess a \$2,000.00 civil penalty for violations of the Section 8-13-1370 of the Ethics Act and permits the Commission to require the forfeiture of any profits obtained in violation thereof.

DISCUSSION

The Commission found probable cause to charge Respondent with one (1) count of violating Section 8-13-1308(B) for failing to file a Quarter 3 2019/Final CDR and one (1) count of violating Section 8-13-1370 for failing to properly close her campaign bank account.¹ Through this Consent Order, Respondent acknowledges she violated the Ethics Act in these instances. In mitigation, Respondent states that 2019 was her first run for public office and she believed her filing duties were

¹ The Commission also found probable cause to believe Respondent had failed to disclose a number of contributions and expenditures in violation of Section 8-13-1308(F). However, given that Respondent has since disclosed these contributions and expenditures, the Commission declines to proceed on these charges. The Commission further found probable cause to believe Respondent violated Section 8-13-1302 for failing to maintain campaign records. However, upon further review, there does not appear to have been a specific request for records made to Respondent during the investigation. Accordingly, the Commission declines to proceed on this charge.

fulfilled when she lost her election and closed her campaign bank account on September 19, 2019. Respondent further states that she made attempts to contact the Commission upon receipt of the Commission's written correspondence and the Complaint, but that she had issues accessing and receiving emails during portions of the relevant time frame. Respondent states she does not intend to seek public office in the future and further states that it was not her intent to conceal anything from the Commission or the public.

DISPOSITION

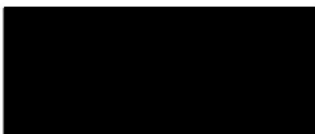
1. The Commission finds Respondent in violation of one (1) count of 8-13-1308(B) and one (1) count of Section 8-13-1370.
2. The Commission adopts the Statements of Fact, Conclusions of Law, Discussion, and Disposition as agreed upon by the Respondent.

THEREFORE, the Commission hereby issues this Public Reprimand and orders Respondent to pay the Commission, within one (1) year from receipt of this Order, a reduced late-filing penalty of \$400.00 and an administrative fee of \$600.00, for a total of \$1,000.00. The Commission further orders Respondent to pay \$43.55 to the Children's Trust Fund and to provide proof of such payment to the Commission within one (1) year from receipt of this Order. The Commission declines to assess any additional accrued late-filing penalties in light of the mitigation referenced herein. In addition, the Commission declines to assess a civil penalty for the violation of Section 8-13-1370 provided Respondent remits the \$43.55 to the Children's Trust Fund as described herein. Should the Respondent fail to remit the \$43.55 to the Children's Trust Fund as described herein, the Commission shall assess a civil penalty of \$1,000.00.

By executing this Consent Order, Respondent understands that she is confessing to a judgment of \$2,043.55 if she does not make payment as provided for in this Order, in which case the Commission shall file a Judgment against Respondent with the County Clerk of Court in Respondent's last known


County of residence, who shall enter this Order in the amount of \$2,043.55 (less any money paid) in its Judgment Rolls, without cost to the Commission

AND IT IS SO ORDERED THIS 9th DAY OF August 2024.



JENNIFER T. GARRETT
RESPONDENT

STATE ETHICS COMMISSION



SCOTT E. FRICK, CHAIR