

# STATE OF SOUTH CAROLINA STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:

CASE NUMBER

c 2023-124

## COMPLAINT FORM

**COMPLAINANT:** Kimberly N. Morgan  
**ADDRESS:** 52 Blacksmith Circle Beaufort, SC 29906  
**TELEPHONE NUMBER:** 843-521-7815  
**TITLE:** Resident of Beaufort County, SC

**RESPONDENT:** Shannon Loper  
**ADDRESS:** [REDACTED]  
**TELEPHONE NUMBER:** [REDACTED]  
**TITLE:** Director, Beaufort County Parks and Recreation

Set forth in detail specific facts upon which you based your complaint against above-named respondent (only detailed, clear factual allegations will be considered. If additional space is needed, attach supplemental sheets).

Beaufort County Parks and Recreation Director Shannon Loper has repeatedly hired her sons Dayton Loper, Dawson Loper, Drew Loper and Devin Loper for positions within the Parks and Recreation Department such as Cheer Camp Instructor and Officiant of Youth Sports—positions for which she is the direct Supervisor—as well as personally signed off on at least one of the invoices for her sons, authorizing payment from the County to her son (see attached June 2022 Invoice from her son, Dayton Loper, to the County for \$2,870 for Cheer Camp Instruction.)

Per Beaufort County's Open Finance website, which allows a User to search Ledger Checkbook entries for payments by Vendor, Shannon Loper's sons have been employed with the County as follows:

- Dawson L. Loper, multiple dates in early 2022 as Youth Basketball Referee
- Dayton Loper, multiple dates in 2022 and 2023 as Instructor for Cheer Camps
- Devin Loper, multiple dates in 2020 as an Official or Officiant for Youth Sports
- Drew V. Loper, multiple dates in 2020 as an Official or Officiant for Youth Sports

Please also note that Dawson L. Loper was charged with Assault/Attempted Murder in March 2021, a felony charge, and Dawson L. Loper has been out on bond since he was arrested, awaiting trial on that charge. Shannon Loper hired him as a Youth Basketball Referee while he was out on bond, and I suspect the Background Check process for Youth Sports employees may have been circumvented to allow his employment.

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 Beaufort

Personally appeared before me Kimberly Morgan who, first being duly sworn, says that he/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 his/her own knowledge, except for those matters therein based upon information and belief, and as to those he/she believes them to be true.

Sworn to and subscribed before me this  
11<sup>th</sup> day of Oct, 2023

[REDACTED SIGNATURE]

Complainant Signature

Notary Public for South Carolina

My Commission expires 04/25/2026  
ALDEN MOULTON

Notary Public, State of South Carolina  
My Commission Expires April 25, 2026

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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Return to Open Fina...

\$167.72 Million Entire Ledger 2023

Entire Ledger  
\$167.72 Million - 100.00% of All

Spending Summary | Checkbook

Checkbook

Vendor Loper | Clear All

TOTAL Transactions  
\$2,677.00 5

Department	Vendor	Description	Check #	Check Date	Amount
GENERIC	SHANNON LOPER	PER DIEM MONROE	12832	Jun 29, 2022	\$359.00
GENERIC	SHANNON LOPER	PER DIEM PHOENIX	13615	Sep 16, 2022	\$342.00
GENERIC	DEVIN LOPER	BLUFFTON ADULT SOFTBALL	14494	Oct 27, 2022	\$72.00
GENERIC	DEVIN LOPER	CHEER CAMP NOV 2023	19458	Jun 15, 2023	\$1,496.25
GENERIC	DEVIN LOPER	CHEER CAMP JUNE 2023	19827	Jun 16, 2023	\$407.75

[Return to Open Fina...](#)

# \$144.91 Million Entire Ledger 2022 ▼ [Open](#) [Print](#) [View PDF](#)

Entire Ledger  
\$144.91 Million - 100.00% of all

Spending Summary Checkbook

## Checkbook

**Vendor Loper** ▼ [Clear All](#)

Department	Vendor	Description	Check #	Check Date	Amount
<a href="#">GENERIC</a>	DAWSON LOPER	PRINTERS FOR OFFICE	8021	Jan 6, 2022	\$504.98
<a href="#">GENERIC</a>	SHANNON LOPER	2 WRIGHT BENCHES	8854	Jan 13, 2022	\$855.98
<a href="#">GENERIC</a>	DWYTON LOPER	CHEER CAMP 06/07-17/2022	12128	Jan 30, 2022	\$2,870.00
<a href="#">GENERIC</a>	DAWSON LOPER	BLUFFTON YOUTH BASKETBALL REFE	8998	Jan 20, 2022	\$360.00
<a href="#">GENERIC</a>	DAWSON LOPER	BLUFFTON YOUTH BASKETBALL	9128	Jan 27, 2022	\$494.00
<a href="#">GENERIC</a>	DAWSON LOPER	BLUFFTON YOUTH BASKETBALL REFE	9240	Feb 3, 2022	\$144.00
<a href="#">GENERIC</a>	DAWSON LOPER	BLUFFTON YOUTH BASKETBALL REFE	9364	Feb 10, 2022	\$286.00
<a href="#">GENERIC</a>	DAWSON LOPER	BLUFFTON YOUTH BASKETBALL REFE	9512	Feb 17, 2022	\$284.00
<a href="#">GENERIC</a>	DAWSON LOPER	BLUFFTON YOUTH BASKETBALL REFE	9645	Feb 24, 2022	\$49.00
<a href="#">GENERIC</a>	DAWSON LOPER	BLUFFTON YOUTH BASKETBALL RE	8853	Jan 14, 2022	\$96.00

**\$6,101.96** 15 Transactions

**\$145.57 Million** Entire Ledger 2021

Entire Ledger  
\$145.57 Million - 100.00% of All

Spending Summary **Checkbook**  
C11C11VVVVVV

\$1,300.00 14

Vendor Loper \* Clear All

Department	Vendor	Description	Check #	Check Date	Amount
GENERIC	DREW VINCENT LOPER	OFFICIAL DOS 10/24 26/2020	973832	Oct 30, 2020	\$144.00
GENERIC	DREW VINCENT LOPER	OFFICIAL DOS 10/21 11/6/2020	973831	Nov 19, 2020	\$72.00
GENERIC	DREW VINCENT LOPER	OFFICIAL BLUFFTON ADULT SOFTB	974598	Nov 24, 2020	\$72.00
GENERIC	DREW VINCENT LOPER	OFFICIAL DOS 11/21 26/2020	974866	Nov 30, 2020	\$96.00
GENERIC	DREW VINCENT LOPER	OFFICIAL DOS 11/28 12/8/2020	975151	Dec 10, 2020	\$48.00
GENERIC	DREW VINCENT LOPER	OFFICIAL DOS 12/5 19/2020	975141	Dec 17, 2020	\$48.00
GENERIC	DREW VINCENT LOPER	OFFICIAL DOS 09/19 - 24/2020	972296	Sep 30, 2020	\$72.00
GENERIC	DREW VINCENT LOPER	OFFICIAL DOS 11/14 19/2020	974597	Nov 23, 2020	\$96.00
GENERIC	DREW VINCENT LOPER	OFFICIAL DOS 09/19 24/2020	972295	Sep 30, 2020	\$72.00

STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )  
)  
)  
IN THE MATTER OF: )  
)  
Complaint C2023-124 )  
)  
Kimberly N. Morgan )  
Complainant. )  
)  
Shannon Loper )  
Respondent. )  
\_\_\_\_\_ )

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, 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, October 17, 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**  
**USE OF OFFICIAL POSITION TO OBTAIN ECONOMIC INTEREST**  
**SECTION 8-13-700(B), S. C. CODE ANNOTATED, 1976, AS AMENDED**

That Shannon Loper, former Director of Beaufort County Parks and Recreation, did in Richland County, use her official position to obtain an economic interest for a family member by authorizing payments to her son, Dawson Loper, totaling \$1,217.00, in violation of Section 8-13-700(B).

**COUNT TWO**  
**USE OF OFFICIAL POSITION TO OBTAIN ECONOMIC INTEREST**  
**SECTION 8-13-700(B), S. C. CODE ANNOTATED, 1976, AS AMENDED**

That Shannon Loper, former Director of Beaufort County Parks and Recreation, did in Richland County, use her official position to obtain an economic interest for a family member by authorizing payments to her son, Devin Loper, totaling of \$144.00, in violation of Section 8-13-700(B).

**COUNT THREE**  
**USE OF OFFICIAL POSITION TO OBTAIN ECONOMIC INTEREST**  
**SECTION 8-13-700(B), S. C. CODE ANNOTATED, 1976, AS AMENDED**

That Shannon Loper, former Director of Beaufort County Parks and Recreation, did in Richland County, use her official position to obtain an economic interest for a family member by authorizing payments to her son, Drew Loper, totaling \$552.00, in violation of Section 8-13-700(B).

**COUNT FOUR**  
**USE OF OFFICIAL POSITION TO OBTAIN ECONOMIC INTEREST**  
**SECTION 8-13-700(B), S. C. CODE ANNOTATED, 1976, AS AMENDED**

That Shannon Loper, former Director of Beaufort County Parks and Recreation, did in Richland County, use her official position to obtain an economic interest for a family member by authorizing payments to her son, Dayton Loper, totaling \$4,774.00, in violation of Section 8-13-700(B).

**COUNT FIVE**  
**USE OF OFFICIAL POSITION TO OBTAIN ECONOMIC INTEREST**  
**SECTION 8-13-700(B), S. C. CODE ANNOTATED, 1976, AS AMENDED**

That Shannon Loper, former Director of Beaufort County Parks and Recreation, did in Richland County, sign a contract with her son using her official capacity as a public employee in which her son would be financially compensated for services performed, in violation of Section 8-

13-700(B).

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 28<sup>th</sup> day,  
of March 2024.

*Certificate of Service by Certified Mail*

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on RESPONDENT Shannon Loper, 8 Fairfax Street, Bluffton, SC 29910 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 2<sup>nd</sup> day of March 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**

Columbia, South Carolina

State Ethics Commission

(803) 253-4192

STATE OF SOUTH CAROLINA )  
 COUNTY OF RICHLAND )  
 )  
 IN THE MATTER OF: )  
 COMPLAINT C2023-124 )  
 )  
 Kimberly N. Morgan, )  
 Complainant, )  
 )  
 Shannon Loper, )  
 Respondent. )  
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BEFORE THE STATE ETHICS COMMISSION

**CONSENT ORDER**

This matter comes before the South Carolina State Ethics Commission (Commission) by way of a complaint filed on October 12, 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 Shannon Loper (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 served as the Beaufort County (County) Director of Parks and Recreation (P&R) from August 2016 until October 2023.
2. Respondent's duties as Director included, in relevant part, approving invoices for payment for employees and independent contractors. According to County records, an additional P&R employee was also authorized to approve invoices for payment from June 16, 2020 until August 30, 2022.
3. Following the filing of the Complaint, the Commission's investigation revealed that Respondent's four (4) sons worked for P&R as independent contractors at various times while Respondent was Director.
4. The Commission's investigation further revealed that, from 2020 through 2023, Respondent authorized multiple invoices for payment to her sons as follows: seven (7) payments to Dawson Loper totaling \$1,212.00; two (2) payments to Devin Loper totaling \$144.00; five (5) payments to

Drew Loper totaling \$552.00; and three (3) payments to Dayton Loper totaling \$4,774.00. Respondent also signed a contract authorizing her son, Dayton Loper, to provide the County services in exchange for compensation. Respondent did not play a role in hiring her other sons.

### CONCLUSIONS OF LAW

Based upon the Statements of Facts, the Commission concludes, as a matter of law:

1. At all times relevant, Respondent was a “public employee,” as defined by Section 8-13-100(25).

Therefore, the Commission has personal and subject matter jurisdiction.

2. Section 8-13-700(B) provides, in relevant part:

(B) No [public employee] may make, participate in making, or in any way attempt to use his [employment] to influence a governmental decision in which he, a family member, an individual with whom he is associated, or a business with which he is associated has an economic interest. A [public employee] who, in the discharge of his official responsibilities, is required to take an action or make a decision which affects an economic interest of himself, a family member, an individual with whom he is associated, or a business with which he is associated shall:

(1) prepare a written statement describing the matter requiring action or decisions and the nature of his potential conflict of interest with respect to the action or decision;

...

(3) if he is a public employee, he shall furnish a copy of the statement to his superior, if any, who shall assign the matter to another employee who does not have a potential conflict of interest. If he has no immediate superior, he shall take the action prescribed by the State Ethics Commission;

3. Section 8-13-100(15) defines “family member” as:

(a) the spouse, parent, brother, sister, child, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, grandparent, or grandchild; or

(b) a member of the individual’s immediate family.

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

5. Section 8-13-320(10)(l)(i) allows the Commission to require payment of a civil penalty of up to

two thousand dollars for each violation of the Ethics Act.

### **DISCUSSION**

The Commission found probable cause to charge Respondent with four (4) counts of violating Section 8-13-700(B) for using her official capacity to authorize the payments as outlined herein and one (1) count of violating Section 8-13-700(B) for signing a contract of employment related to her son. Through this Consent Order, Respondent acknowledges she violated the Ethics Act in each instance outlined in the Notice of Hearing.

In mitigation, Respondent asserts that she sought advice from the County's legal department regarding whether her signing her son's employment contract would be permissible and was advised that she could proceed. Respondent further states that the County Administrator, Eric Greenway, instructed her to sign her son's employment contract after she inquired whether her doing so would be a conflict of interest. Similarly, Respondent asserts that the County's finance department advised her that she was allowed to authorize her sons' invoices for payment due to her ministerial role in payment of invoices.<sup>1</sup> Finally, Respondent asserts that her sons were hired due to staff unavailability and that she otherwise would have had to cancel planned P&R events.<sup>2</sup> The Commission acknowledges there is no evidence to suggest that Respondent's sons received pay beyond what is standard for the positions they held or that they were preferentially given positions.

### **DISPOSITION**

1. The Commission hereby finds Respondent in violation of five (5) counts of Section 8-13-700(B) as outlined herein.

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<sup>1</sup> As a course of practice, two (2) separate County employees reviewed and approved invoices prior to Respondent's review and authorization. After Respondent authorized the invoices for payment, the invoices were then sent to the County's finance department for acceptance. If accepted, the finance department would then remit payment.

<sup>2</sup> The Commission could not confirm the veracity of Respondent's assertions, but no evidence exists to cause the Commission to question the truthfulness of her assertions.

2. The Commission hereby 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 to Respondent;

AND orders Respondent to pay to the Commission, within one (1) year, a reduced civil penalty of \$1,000.00 (\$200.00 for each count) and an administrative fee of \$500.00, for a total of \$1,500.00.

By executing this Consent Order, Respondent understands that she is not only admitting to violations of the Act, but also confessing to a judgment of \$1,500.00 (less any money paid to the Commission) in the event she does not make full and timely payment as provided in this Order. In that event, the Commission shall file a Judgment against Respondent in the County of Respondent's last known residence. Upon said filing, the Clerk of Court shall enter this Order in the amount of \$1,500.00 (less any money paid to the Commission) in its Judgment Rolls, without cost to the Commission.

AND IT IS ORDERED THIS 27<sup>th</sup> DAY OF October, 2024.

STATE ETHICS COMMISSION

  
SCOTT E. FRICK, CHAIR

  
SHANNON LOPER  
RESPONDENT