

STATE OF SOUTH CAROLINA  
STATE ETHICS COMMISSION

STATE ETHICS COMMISSION  
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FOR COMMISSION USE ONLY:  
CASE NUMBER  
C 2024-002

COMPLAINT FORM

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

RESPONDENT: SLF III – Hardeeville, LLC c/o  
Ankura  
ADDRESS: Robert Unell

TELEPHONE NUMBER: (4 [REDACTED]  
2 [REDACTED])

TELEPHONE NUMBER: (803) 253-4192

TITLE: Lobbyist's Principal

In accordance with Section 2-17-35, South Carolina Code of Laws, 1976, as amended, each lobbyist's principal must file disclosure statements no later than June thirtieth and January thirty-first of each year covering lobbyist payments and expenditures attributable to lobbying during that filing period.

Records of the State Ethics Commission indicate that a Lobbyist's Principal Disclosure Statement for the reporting period of January 1, 2021 through May 31, 2021 was due no later than June 30, 2021, and a Lobbyist's Principal Disclosure Statement for the reporting period of June 1, 2021 through December 31, 2021 was due no later than January 31, 2022.

Respondent was reminded of the filing requirement by letters sent November 1, 2022, March 6, 2023, and April 10, 2023 as described in the attached. In addition, an email reminder was sent thirty days prior to the deadline. To date, a properly completed June 30, 2021 Lobbyist's Principal Disclosure Statement and January 31, 2022 Lobbyist's Principal Disclosure Statement have not been received. All in violation of Section 2-17-35, 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

Sworn to and subscribed before me this  
8th day of January, 2024

[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 )  
IN THE MATTER OF: )  
Complaint C2024-002 )  
State Ethics Commission )  
Complainant. )  
SLF III – Hardeeville LLC )  
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 16, 2025 at 9:30 a.m. at the Commission Hearing Room located at: 201 Executive Center Drive, Suite 150, Columbia, South Carolina 29210.

The following allegation will be heard:

**COUNT ONE**  
**FAILURE TO REGISTER AS LOBBYIST’S PRINCIPAL**  
**SECTION 2-17-25(G), S.C. CODE ANN., 1976, AS AMENDED**

That SLF III – Hardeeville LLC, a Lobbyist’s Principal, did in Richland County, fail to register as a Lobbyist’s Principal in 2024, in violation of Section 2-17-35(G).

**COUNT TWO**  
**FAILURE TO FILE A LOBBYIST’S PRINCIPAL’S REPORT**  
**SECTION 2-17-35, S.C. CODE ANN., 1976, AS AMENDED**

That SLF III – Hardeeville LLC, a Lobbyist’s Principal, did in Richland County, fail to file a June 30, 2021 Lobbyist’s Principal Report, in violation of Section 2-17-35.

**COUNT THREE**  
**FAILURE TO FILE A LOBBYIST’S PRINCIPAL’S REPORT**  
**SECTION 2-17-35, S.C. CODE ANN., 1976, AS AMENDED**

That SLF III – Hardeeville LLC, a Lobbyist’s Principal, did in Richland County, fail to file a January 31, 2022 Lobbyist’s Principal Report, in violation of Section 2-17-35.

**COUNT FOUR**  
**FAILURE TO FILE A LOBBYIST’S PRINCIPAL’S REPORT**  
**SECTION 2-17-35, S.C. CODE ANN., 1976, AS AMENDED**

That SLF III – Hardeeville LLC, a Lobbyist’s Principal, did in Richland County, fail to file a June 30, 2024 Lobbyist’s Principal Report, in violation of Section 2-17-35.

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.).

**[This space intentionally left blank]**

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 20<sup>th</sup> day,  
of March 2025.

**Certificate of Service by Certified Mail**

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the Respondent's Attorney Karl S. Bowers, PO Box 50549 Columbia, South Carolina 29250 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 26<sup>th</sup> day of March 2025, 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

Columbia, South Carolina

(803) 253-4192

STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )  
IN THE MATTER OF: )  
COMPLAINT C2024-002 )  
State Ethics Commission, )  
Complainant, )  
SLF III – Hardeeville LLC, )  
Respondent. )  
\_\_\_\_\_ )

BEFORE THE STATE ETHICS COMMISSION

**CONSENT ORDER**

This matter comes before the State Ethics Commission (Commission) by way of a Complaint filed on January 8, 2024. Pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act (Ethics Act), the complaint against SLF III – Hardeeville LLC (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. On April 5, 2021, Respondent registered as a Lobbyist's Principal (LP) for the 2021 calendar year.
2. By virtue of its registration, Respondent was required to file, but failed to file, a LP Disclosure Statement on or before June 30, 2021, for the period of April 5, 2021 through May 31, 2021.
3. Respondent was also required to file, but failed to file, a LP Disclosure Statement on or before January 31, 2022, for the period of June 1, 2021 through December 31, 2021.
4. In a November 1, 2022 first-class letter, the Commission notified Respondent of its failure to file June 30, 2021 and January 31, 2022 LP Disclosure Statements.
5. In a March 6, 2023 certified letter, the Commission ordered Respondent to cease all lobbying activity due to its failure to file the June 30, 2021 and January 31, 2022 LP Disclosure Statements.
6. The March 6, 2023, certified letter was mailed to Robert Unell, 1180 West Peachtree Street NW, Atlanta, GA, which was the point-of-contact information provided by Respondent during registration. According to the United States Postal Service (USPS), the letter was returned to the

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Commission as “Not Deliverable as Addressed” on March 31, 2023.

7. On April 10, 2023, the letter was re-mailed via certified mail to Respondent’s address of record. According to the USPS, the re-mailed letter was delivered on April 13, 2023 at 4:09 p.m. The return receipt contained the notation “POSTAL (COVID-19),” but did not contain a signature.
8. On April 23, 2023, late-filing penalties began to accrue at \$20.00 per day (\$10.00 per Disclosure Statement).
9. On May 3, 2023, late-filing penalties began to accrue at \$200.00 per day (\$100.00 per Disclosure Statement).
10. On October 5, 2023, Commission staff telephoned Unell and left a voicemail regarding Respondent’s LP Disclosure Statements.
11. Receiving no response, the Respondent’s LP account within the Commission’s electronic filing system was locked and the Complaint was filed on January 8, 2024.
12. On April 2, 2024, a Commission Investigator spoke with Unell via telephone. Unell advised the Investigator that he had forgotten about the LP Disclosure Statements and would work with Commission staff to come into compliance.
13. On April 9, 2024, Unell attempted to log into Respondent’s LP account within the Commission’s electronic filing system, but received the following error message: “Could not authenticate the username/password provided. Please contact the State Ethics Commission for assistance at (803) 253-4192.”
14. Unell, believing the log-in issues were caused by user-error, created an additional LP account in the Commission’s electronic filing system under the name “Stratford Land Fund III, LP” and filed a 2024 LP Registration.
15. On July 18, 2024, Unell received assistance from Commission staff and filed Respondent’s June 30, 2021 and January 31, 2022 LP Disclosure Statements.

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16. While receiving assistance from Commission staff on July 18, 2024, Unell advised that Respondent was also currently engaged in lobbying. At that time, Respondent should have filed, but had not filed, a June 30, 2024 LP Disclosure Statement.
17. Commission staff thereafter assisted Unell with filing Respondent's June 30, 2024 LP Disclosure Statement. Therein, Respondent disclosed one (1) payment to a lobbyist in the amount of \$16,000.00.

### 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 lobbyist's principal pursuant to Section 2-17-10(14). Therefore, the Commission has personal and subject matter jurisdiction.
2. Section 2-17-25 provides, in relevant part:
  - (A) Any lobbyist's principal must, within fifteen days of employing, appointing, or retaining a lobbyist, register with the State Ethics Commission as provided within this section . . . .
  - ...
  - (G) A lobbyist's principal must reregister annually with the State Ethics Commission by January fifth of each year
3. Section 2-17-35(A) provides, in relevant part:

Except as otherwise provided by Section 2-17-90(E), each lobbyist's principal, no later than June thirtieth and January thirty-first of each year, must file a report with the State Ethics Commission covering that lobbyist's principal's expenditures attributable to lobbying during that filing period. The filing periods are from January first to May thirty-first for the June thirtieth report, and are from June first to December thirty-first for the January thirty-first report . . .
4. Section 2-17-50(A) provides, in relevant part:

The State Ethics Commission shall: (1) require a person to submit information pursuant to the requirements of this chapter; (2) in addition to any other penalty in this chapter, require a person who files a late statement or fails to file a required statement to be assessed a civil penalty as follows: (a) a fine of one hundred dollars if not filed within ten days after the established deadline provided in this chapter; and (b) after notice has been given by certified or registered mail that a required statement has not been filed, a fine of ten dollars per calendar day for the

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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.

#### **DISCUSSION**

The Commission found probable cause to charge Respondent with three (3) counts of violating Section 2-17-35 for failing to file LP Disclosure Statements for June 30, 2021, January 31, 2022, and June 30, 2024.<sup>1</sup> Through this Consent Order, Respondent acknowledges that it violated the Ethics Act by failing to timely file these reports. In mitigation, Respondent states that Unell did not receive the Commission’s April 10, 2023 correspondence. The Commission acknowledges this possibility in light of the aforementioned postal notation and lack of signature on the return receipt. Respondent further states that it attempted to register in 2024, but was unable to do so given that it’s LP account within the Commission’s electronic filing system was locked.

#### **DISPOSITION**

1. The Commission hereby finds Respondent in violation of three (3) counts of 2-17-35.
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 sixty (60) days from receipt of this Order, a reduced late-filing penalty of \$1,100.00 (\$500.00 each for the June 30, 2021 and January 31, 2022 Disclosure Statements and

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<sup>1</sup> The Commission also found probable cause to believe Respondent violated Section 2-17-25 for failing to timely file a 2024 LP Registration. However, given that Respondent registered on April 9, 2024 (albeit under a different LP account), the Commission declines to proceed as to this count.

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\$100.00<sup>2</sup> for the June 30, 2024 LP Disclosure Statement) and an administrative fee of \$900.00, for a total of \$2,000.00. The Commission declines to assess the remaining \$9,000.00 in late-filing penalties in light of the aforementioned mitigation.

By executing this Consent Order, Respondent understands that it is not only admitting to a violation of the Ethics Act, but also confessing to a judgment of \$2,000.00 in the event it 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 business or residence, who shall enter this Order in the amount of \$2,000.00 (less any money paid) in its Judgment Rolls, without cost to the Commission.

AND IT IS SO ORDERED THIS 20<sup>th</sup> DAY OF July 2025.

STATE ETHICS COMMISSION

[REDACTED]

ROBERT UNELL  
SLF III – HARDEEVILLE LLC  
RESPONDENT

[REDACTED]

BUTCH BOWERS  
RESPONDENT'S ATTORNEY

<sup>2</sup> Pursuant to Section 2-17-50(A), the late-filing penalty with regard to the June 30, 2024 LP Disclosure Statement is limited to \$100.00 because the Commission did not provide certified notice to Respondent of its failure to timely file this report.