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STATE ETHICS COMMISSION

STATE OF SOUTH CAROLINA
STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:
CASE NUMBER
C. 2017-106

COMPLAINT FORM

COMPLAINANT:	State Ethics Commission	RESPONDENT:	Ms. Dalhi Myers
ADDRESS:	5000 Thurmond Mall, Suite 250 Columbia, SC 29201	ADDRESS:	[REDACTED]
TELEPHONE NUMBER:	(803)253-4192	TELEPHONE NUMBER:	[REDACTED]
		EMAIL ADDRESS:	<u>dalhi31@gmail.com</u>
		TITLE:	Council - Richland County

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 2017 Statement of Economic Interests by March 30, 2017.

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. Records of the State Ethics Commission indicate that a quarterly Campaign Disclosure was due no later than January 10, 2017 and April 10, 2017. The Respondent was sent an email reminder thirty days before the quarterly Campaign Disclosure deadlines.

Section 8-13-1308 (F), S.C. Code Ann., 1976, as amended, requires that 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.

Respondent was reminded of the filing requirement by letters sent January 17, 2017 and April 28, 2017 as described in the attached. To date, no properly completed 2017 Statement of Economic Interests, January 10, 2017 Campaign Disclosure, or April 10, 2017 Campaign Disclosure have been received. All in violation of Section 8-13-1140, Section 8-13-1308 (B), and Section 8-13-1308 (F), S.C. Code Ann., 1976, as amended.

All investigations, inquiries, hearings, and accompanying documents must remain confidential until final disposition of a matter unless the respondent waives the right to confidentiality. The willful release of confidential information is a misdemeanor, and any person releasing such confidential information, upon conviction, must be fined not more than one thousand dollars (\$1,000) or imprisoned not more than one year. Section 8-13-320(10)(g).

STATE OF SOUTH CAROLINA
COUNTY OF Richland

Personally appeared before me Steven W. Hamm who, first being duly sworn, says that he is the Executive Director of the State Ethics Commission and in that capacity acknowledges that the above information was reviewed by the State Ethics Commission, and that this complaint is filed on its behalf.

Sworn to and subscribed before me this
2nd day of June, 2017

[REDACTED]
Steven W. Hamm, Interim Executive Director

[REDACTED]
Notary Public for South Carolina
My Commission expires March 25, 2025.

SEC-7 (Revised 10-18-00)

REPLY TO: 5000 Thurmond Mall, Suite 250
Columbia, South Carolina 29201
TELEPHONE: (803)253-4192

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STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

BEFORE THE STATE ETHICS COMMISSION

IN THE MATTER OF:)

Complaint C2017-106)

Dahli Myers)
Respondent.)

NOTICE OF HEARING

State Ethics Commission)
Complainant.)
_____)

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 State Ethics Commission will, therefore, 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 Regs. 24 (1997 Cum. Supp.) on Thursday, May 16th, 2019 at 2:00 p.m. at the State Ethics 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 TIMELY FILE A STATEMENT OF ECONOMIC INTERESTS REPORT
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to timely file a 2017 Statement of Economic Interests Report by March 30, 2017, in violation of Section 8-13-1140.

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$250.00 from Elizabeth Portee that was deposited in her campaign account on April 5, 2016, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$250.00 from Martha Brown that was deposited in her campaign account on April 9, 2016, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$500.00 from John Geltum that was deposited in her campaign account on April 20, 2016, in violation of Section 8-13-1308(F).

COUNT FIVE
**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$100.00 from John Van Duys that was deposited in her campaign account on April 21, 2016, in violation of

Section 8-13-1308(F).

COUNT SIX
**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$200.00 from James Becker that was deposited in her campaign account on April 21, 2016, in violation of Section 8-13-1308(F).

COUNT SEVEN
**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$200.00 from William Reamer that was deposited in her campaign account on April 21, 2016, in violation of Section 8-13-1308(F).

COUNT EIGHT
**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$250.00 from William C. Boyd that was deposited in her campaign account on April 21, 2016, in violation of Section 8-13-1308(F).

COUNT NINE
**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$250.00 from

Steve Matthews that was deposited in her campaign account on April 21, 2016, in violation of Section 8-13-1308(F).

COUNT TEN

**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$100.00 from Thomas Elliott that was deposited in her campaign account on April 26, 2016, in violation of Section 8-13-1308(F).

COUNT ELEVEN

**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$50.00 from Ruth Johnson that was deposited in her campaign account on April 26, 2016, in violation of Section 8-13-1308(F).

COUNT TWELVE

**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$27.00 from Andrew Taslitz that was deposited in her campaign account on May 6, 2016, in violation of Section 8-13-1308(F).

COUNT THIRTEEN

**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to disclose in a certified campaign disclosure report a contribution in the amount of \$250.00 from Krystal Conner that was deposited in her campaign account on May 19, 2016, in violation of Section 8-13-1308(F).

COUNT FOURTEEN
**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$250.00 from Audrey Lynn that was deposited in her campaign account on May 19, 2016, in violation of Section 8-13-1308(F).

COUNT FIFTEEN
**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$250.00 from Adrienne Sicakowski that was deposited in her campaign account on May 19, 2016, in violation of Section 8-13-1308(F).

COUNT SIXTEEN
**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$500.00 from Leroy Green that was deposited in her campaign account on May 31, 2016, in violation of Section 8-13-1308(F).

COUNT SEVENTEEN
**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$100.00 from John Boyd that was deposited in her campaign account on June 8, 2016, in violation of Section 8-13-1308(F).

COUNT EIGHTEEN
**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$200.00 from Donald Dial, Jr. that was deposited in her campaign account on June 8, 2016, in violation of Section 8-13-1308(F).

COUNT NINETEEN
**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$200.00 from Steve Matthews that was deposited in her campaign account on June 8, 2016, in violation of Section 8-13-1308(F).

COUNT TWENTY
**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$500.00 from E.C. Ownings that was deposited in her campaign account on June 29, 2016, in violation of Section

8-13-1308(F).

COUNT TWENTY-ONE
FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$500.00 from Anna H. Small that was deposited in her campaign account on June 29, 2016, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$500.00 from Mary Hipp that was deposited in her campaign account on June 29, 2016, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$500.00 from Kathryn Oken that was deposited in her campaign account on August 18, 2016, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a contribution in the amount of \$500.00 from

SC Builder's PAC that was deposited in her campaign account on December 7, 2016, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 9, 2016 expenditure for a "strategy meeting" in the amount of \$22.92 to JDs Place, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 11, 2016 expenditure for "campaign buttons" in the amount of \$613.73 to FedEx Office, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 12, 2016 expenditure for "ice cream" in the amount of \$112.17 to Fresh Market, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 14, 2016 expenditure for an ATM Withdrawal Fee in the amount of \$2.50, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 14, 2016 expenditure for “food for volunteers” in the amount of \$20.00 to Young’s, in violation of Section 8-13-1308(F).

COUNT THIRTY
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 14, 2016 expenditure for “food for volunteers” in the amount of \$35.48 to Zaxby’s, in violation of Section 8-13-1308(F).

COUNT THIRTY-ONE
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 15, 2016 expenditure for “signs” in the amount of \$91.80 to Velvetex, in violation of Section 8-13-1308(F).

COUNT THIRTY-TWO
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 15, 2016 expenditure for “palm cards” in the amount of \$350.31 to Print House Plus, in violation of Section 8-13-1308(F).

COUNT THIRTY-THREE
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to disclose in a certified campaign disclosure report an April 17, 2016 expenditure for "campaign manager interview" in the amount of \$57.78 to Longhorn Steak, in violation of Section 8-13-1308(F).

COUNT THIRTY-FOUR
**FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 18, 2016 expenditure for "food for volunteers" in the amount of \$80.86 to Ruby Tuesday, in violation of Section 8-13-1308(F).

COUNT THIRTY-FIVE
**FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 19, 2016 expenditure for a non-sufficient funds return fee in the amount of \$35.00, in violation of Section 8-13-1308(F).

COUNT THIRTY-SIX
**FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 22, 2016 expenditure for an ATM balance inquiry fee in the amount of 2.00, in violation of Section 8-13-1308(F).

COUNT THIRTY-SEVEN
**FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 22, 2016 expenditure for an ATM withdrawal fee in the amount of 2.50, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 26, 2016 expenditure for “gas” in the amount of \$32.81 to Shell, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 25, 2016 expenditure for “food for volunteers” in the amount of \$30.72 to IHOP, in violation of Section 8-13-1308(F).

COUNT FORTY
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 26, 2016 expenditure for “snack for volunteers” in the amount of \$6.08 to Shell, in violation of Section 8-13-1308(F).

COUNT FORTY-ONE
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 26, 2016 expenditure for “flyers” in the amount of \$46.74 to Office Depot, in violation of Section 8-13-1308(F).

COUNT FORTY-TWO
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to disclose in a certified campaign disclosure report an April 26, 2016 expenditure for “gas” in the amount of \$35.40 to Little Giant BP, in violation of Section 8-13-1308(F).

COUNT FORTY-THREE
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 26, 2016 expenditure for “food for volunteers” in the amount of \$27.29 to Shoney’s, in violation of Section 8-13-1308(F).

COUNT FORTY-FOUR
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an April 28, 2016 expenditure for “ice cream for volunteers” in the amount of \$161.39 to Sam’s Club, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 10, 2016 expenditure for “balloons” in the amount of \$318.00 to Balloons Tomorrow, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 16, 2016 expenditure for “snacks for volunteers” in the amount of \$11.43 to Congaree Convenience, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 16, 2016 expenditure for “first aid kit” in the amount of \$21.59 to CVS, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 16, 2016 expenditure for “candy for voters” in the amount of \$132.50 to Sam’s Club, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 16, 2016 expenditure for “ferns” in the amount of \$81.04 to Lowe’s, in violation of Section 8-13-1308(F).

COUNT FIFTY
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 16, 2016 expenditure for “supplies/sandwich bags” in the amount of \$39.44 to Sam’s Club, in violation of Section 8-13-1308(F).

COUNT FIFTY-ONE
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 17, 2016 expenditure for “live calling” in the amount of \$1,600.00 to Gravis Marketing, in violation of Section 8-13-1308(F).

COUNT FIFTY-TWO
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 17, 2016 expenditure for “flyers/door hangars” in the amount of \$900.00 to Gravis Marketing, in violation of Section 8-13-1308(F).

COUNT FIFTY-THREE
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 18, 2016 expenditure for “poles for signs” in the amount of \$36.16 to Horse Garden Ace, in violation of Section 8-13-1308(F).

COUNT FIFTY-FOUR
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 20, 2016 expenditure for “chocolate” in the amount of \$30.24 to Belk, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to disclose in a certified campaign disclosure report an May 20, 2016 expenditure for "palm cards" in the amount of \$429.96 to FedEx Office, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 21, 2016 expenditure for "ice cream" in the amount of \$136.95 to Sam's Club, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 21, 2016 expenditure for "food for volunteers" in the amount of \$25.35 to McDonald's, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 23, 2016 expenditure for "snacks for volunteers" in the amount of \$29.02 to Murphy at WalMart, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 24, 2016 expenditure for an ATM balance inquiry fee in the amount of 2.00, in violation of Section 8-13-1308(F).

COUNT SIXTY
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 24, 2016 expenditure for "helium tank" in the amount of \$76.59 to Party City, in violation of Section 8-13-1308(F).

COUNT SIXTY-ONE
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 25, 2016 expenditure for "campaign supplies" in the amount of \$6.60 to WalMart, in violation of Section 8-13-1308(F).

COUNT SIXTY-TWO
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 26, 2016 expenditure for "live calling and polling" in the amount of \$1,000.00 to Gravis Marketing, in violation of Section 8-13-1308(F).

COUNT SIXTY-THREE
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a May 31, 2016 expenditure for "victory party" in the amount of \$80.61 to JDs Place, in violation of Section 8-13-1308(F).

COUNT SIXTY-FOUR
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to disclose in a certified campaign disclosure report a June 2, 2016 expenditure for "food" in the amount of \$62.03 to California Dreaming, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a June 8, 2016 expenditure for "campaign lunch meeting" in the amount of \$85.71 to JDs Place, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a June 9, 2016 expenditure for "food for volunteers" in the amount of \$208.65 to JDs Place, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a June 9, 2016 expenditure for "food for volunteers" in the amount of \$36.63 to Krispy Kreme, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a June 16, 2016 expenditure for "food for volunteers" in the amount of \$39.60 to Little Caesars, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a June 18, 2016 expenditure for “snacks for volunteers” in the amount of \$14.32 to Short Trip, in violation of Section 8-13-1308(F).

COUNT SEVENTY
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a June 23, 2016 expenditure for “copies/flyers” in the amount of \$264.60 to Staples, in violation of Section 8-13-1308(F).

COUNT SEVENTY-ONE
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a June 23, 2016 expenditure for “campaign supplies” in the amount of \$32.40 to Dollar Tree, in violation of Section 8-13-1308(F).

COUNT SEVENTY-TWO
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a June 23, 2016 expenditure for “campaign supplies” in the amount of \$12.60 to FedEx Office, in violation of Section 8-13-1308(F).

COUNT SEVENTY-THREE
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to disclose in a certified campaign disclosure report a June 23, 2016 expenditure for "campaign supplies" in the amount of \$21.87 to Staples, in violation of Section 8-13-1308(F).

COUNT SEVENTY-FOUR
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a June 24, 2016 expenditure for "campaign buttons" in the amount of \$443.39 to Dr. Don's Buttons, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a June 24, 2016 expenditure for "computer time to order buttons" in the amount of \$3.03 to FedEx Office, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a June 25, 2016 expenditure for "calling" in the amount of \$1,000.00 to Gravis Marketing, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a June 27, 2016 expenditure for "flyers" in the amount of \$388.60 to FedEx, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a June 30, 2016 expenditure for “campaign leaders dinner” in the amount of \$92.40 to Cola’s, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a July 5, 2016 expenditure for “campaign supplies” in the amount of \$42.82 to Walgreen’s, in violation of Section 8-13-1308(F).

COUNT EIGHTY
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a July 5, 2016 expenditure for “fireworks for campaign party” in the amount of \$259.18 to TNT Fireworks, in violation of Section 8-13-1308(F).

COUNT EIGHTY-ONE
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a July 6, 2016 expenditure for “copies” in the amount of \$36.89 to FedEx Office, in violation of Section 8-13-1308(F).

COUNT EIGHTY-TWO
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to disclose in a certified campaign disclosure report a July 6, 2016 expenditure for “food” in the amount of \$16.89 to Wendy’s, in violation of Section 8-13-1308(F).

COUNT EIGHTY-THREE
**FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a July 27, 2016 expenditure for “popcorn, candy, peanuts to hand out” in the amount of \$74.27 to Cromers Retail, in violation of Section 8-13-1308(F).

COUNT EIGHTY-FOUR
**FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a July 27, 2016 expenditure for “campaign supplies/bags” in the amount of \$64.48 to Family Dollar, in violation of Section 8-13-1308(F).

COUNT EIGHTY-FIVE
**FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a July 29, 2016 expenditure for “Don Guilliard-review absentee ballots” in the amount of \$241.85 to Embassy Suites, in violation of Section 8-13-1308(F).

COUNT EIGHTY-SIX
**FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a July 29, 2016 expenditure for “Don

Guilliard-review absentee ballots” in the amount of \$205.12 to Embassy Suites, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a July 28, 2016 expenditure for “food/snacks for volunteers” in the amount of \$38.72 to Midway Citgo One, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an August 4, 2016 expenditure for monthly service fee in the amount of \$10.00 to Wells Fargo, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an August 18, 2016 expenditure for ATM statement fee in the amount of \$1.00 to Wells Fargo, in violation of Section 8-13-1308(F).

COUNT NINETY
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report an August 20, 2016 expenditure for “ice and cooler” in the amount of \$12.24 to Bi-Lo, in violation of Section 8-13-1308(F).

COUNT NINETY-ONE
**FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a September 7, 2016 expenditure for monthly service fee in the amount of \$10.00 to Wells Fargo, in violation of Section 8-13-1308(F).

COUNT NINETY-TWO
**FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a November 4, 2016 expenditure for monthly service fee in the amount of \$10.00 to Wells Fargo, in violation of Section 8-13-1308(F).

COUNT NINETY-THREE
**FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a November 30, 2016 expenditure for "drinks and snacks" in the amount of \$28.15 to Short Trip, in violation of Section 8-13-1308(F).

COUNT NINETY-FOUR
**FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a November 30, 2016 expenditure for "drinks and snacks" in the amount of \$5.99 to Short Trip, in violation of Section 8-13-1308(F).

COUNT NINETY-FIVE
**FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to disclose in a certified campaign disclosure report a November 29, 2016 expenditure for “team lunch” in the amount of \$39.29 to Chinese-American House, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a December 6, 2016 expenditure for monthly service fee in the amount of \$10.00 to Wells Fargo, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a December 10, 2016 expenditure for “thank you meal for poll workers” in the amount of \$58.85 to Waffle House, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a December 12, 2016 expenditure for an ATM Transaction Fee in the amount of \$2.50, in violation of Section 8-13-1308(F).

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

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a December 14, 2016 expenditure for “candy canes” in the amount of \$55.21 to Dollar Tree, in violation of Section 8-13-1308(F).

COUNT ONE-HUNDRED
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a December 22, 2016 expenditure for “parking ticket” in the amount of \$4.00 to Columbia Lady St Garage, in violation of Section 8-13-1308(F).

COUNT ONE-HUNDRED ONE
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a January 6, 2017 expenditure for monthly service fee in the amount of \$10.00 to Wells Fargo, in violation of Section 8-13-1308(F).

COUNT ONE-HUNDRED TWO
FAILURE TO DISCLOSE EXPENDITURE ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to disclose in a certified campaign disclosure report a March 7, 2017 expenditure for service fee charged off in the amount of \$3.32 to Wells Fargo, in violation of Section 8-13-1308(F).

COUNT ONE-HUNDRED THREE
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 21, 2016 campaign contribution of \$500.00 from Dahli Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED FOUR
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to deposit an April 16, 2016 campaign contribution of \$1,000.00 from Theodore Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED FIVE
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 16, 2016 campaign contribution of \$1,000.00 from Nan Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED SIX
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 16, 2016 campaign contribution of \$1,000.00 from Sonya Myers Crawford into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED SEVEN
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 16, 2016 campaign contribution of \$500.00 from Theodore Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED EIGHT
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 16, 2016 campaign contribution of \$50.00 from Reginald Alexander into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED NINE
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 16, 2016 campaign contribution of \$1,140.00 from Dahli Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED TEN
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 15, 2016 campaign contribution of \$2,500.00 from Dahli Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED ELEVEN
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit a May 7, 2016 campaign contribution of \$5,286.50 from Dahli Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED TWELVE
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit a May 7, 2016 campaign contribution of \$1,420.00 from Dahli Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED THIRTEEN
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to deposit a May 7, 2016 campaign contribution of \$12,200.00 from Dahli Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED FOURTEEN
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit a June 1, 2016 campaign contribution of \$1,000.00 from Nan Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED FIFTEEN
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit a June 1, 2016 campaign contribution of \$1,000.00 from Robert F. Garrick into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED SIXTEEN
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 30, 2016 campaign contribution of \$1,000.00 from Theodore Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED SEVENTEEN
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit a May 25, 2016 campaign contribution of \$22,000.00 from Dahli Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED EIGHTEEN
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit a November 1, 2016 campaign contribution of \$4,500.00 from Dahli Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED NINETEEN
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to deposit a September 1, 2016 campaign contribution of \$1,000.00 from Dahli Myers into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED TWENTY
FAILURE TO PAY CAMPAIGN EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to pay an April 16, 2016 campaign expenditure in the amount of \$1,140 to “purchase signs” from her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED TWENTY-ONE
FAILURE TO PAY CAMPAIGN EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to pay an April 21, 2016 campaign expenditure in the amount of \$500.00 to “purchase signs” from her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED TWENTY-TWO
FAILURE TO PAY CAMPAIGN EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to pay a May 7, 2016 campaign expenditure in the amount of \$7,700.00 to “purchase signage” from her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED TWENTY-THREE
FAILURE TO PAY CAMPAIGN EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 7, 2016 campaign expenditure in the amount of \$1,420.00 for “radio advertising” from her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED TWENTY-FOUR
FAILURE TO PAY CAMPAIGN EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 7, 2016 campaign expenditure in the amount of \$12,200.00 for “campaign mailers and live calls” from her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED TWENTY-FIVE
FAILURE TO PAY CAMPAIGN EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 1, 2016 campaign expenditure in the amount of \$5,200.00 for a “sign purchase” from her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED TWENTY-SIX
FAILURE TO PAY CAMPAIGN EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to pay a June 7, 2016 campaign expenditure in the amount of \$1,420.00 for “radio advertising” from her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED TWENTY-SEVEN
FAILURE TO PAY CAMPAIGN EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to pay a June 7, 2016 campaign expenditure in the amount of \$1,420.00 for "radio advertising" from her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED TWENTY-EIGHT
FAILURE TO PAY CAMPAIGN EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to pay a June 2, 2016 campaign expenditure in the amount of \$12,200.00 for "direct mail and live calls" from her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED TWENTY-NINE
FAILURE TO PAY CAMPAIGN EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 10, 2016 campaign expenditure in the amount of \$6,892.50 for "printing palm cards" from her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED THIRTY
FAILURE TO PAY CAMPAIGN EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 7, 2016 campaign expenditure in the amount of \$140.00 for "additional radio advertising" from her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED THIRTY-ONE
FAILURE TO PAY CAMPAIGN EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to pay a May 1, 2016 campaign expenditure in the amount of \$7,700.00 for “signs” from her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED THIRTY-TWO
FAILURE TO PAY CAMPAIGN EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 7, 2016 campaign expenditure in the amount of \$5,500.00 for “live calls” from her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED THIRTY-THREE
FAILURE TO SIGN A CAMPAIGN ACCOUNT CHECK TO PAY A CAMPAIGN
EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign account check to pay an April 11, 2016 “ATM withdrawal-Subway-food for volunteers” campaign expenditure in the amount of \$60.00, in violation of 8-13-1312.

COUNT ONE-HUNDRED THIRTY-FOUR
FAILURE TO SIGN A CAMPAIGN ACCOUNT CHECK TO PAY A CAMPAIGN
EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign account check to pay an April 14, 2016 “Non WF ATM withdrawal-Youngs Food-food for volunteers” campaign expenditure in the amount of \$23.00, in violation of 8-13-1312.

COUNT ONE-HUNDRED THIRTY-FIVE
FAILURE TO SIGN A CAMPAIGN ACCOUNT CHECK TO PAY A CAMPAIGN
EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to sign a campaign account check to pay an April 22, 2016 "Non WF ATM withdrawal-Subway-food for volunteers" campaign expenditure in the amount of \$303.00, in violation of 8-13-1312.

COUNT ONE-HUNDRED THIRTY-SIX
FAILURE TO SIGN A CAMPAIGN ACCOUNT CHECK TO PAY A CAMPAIGN
EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign account check to pay a May 19, 2016 "Cash ewithdrawal in branch-Sam's Club-snacks for volunteers" campaign expenditure in the amount of \$480.00, in violation of 8-13-1312.

COUNT ONE-HUNDRED THIRTY-SEVEN
FAILURE TO SIGN A CAMPAIGN ACCOUNT CHECK TO PAY A CAMPAIGN
EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign account check to pay a June 2, 2016 "ATM withdrawal-FedEx-campaign door knockers" campaign expenditure in the amount of \$140.00, in violation of 8-13-1312.

COUNT ONE-HUNDRED THIRTY-EIGHT
FAILURE TO SIGN A CAMPAIGN ACCOUNT CHECK TO PAY A CAMPAIGN
EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign account check to pay a June 29, 2016 "ATM withdrawal-Subway-food for volunteers" campaign expenditure in the amount of \$300.00, in violation of 8-13-1312.

COUNT ONE-HUNDRED THIRTY-NINE
FAILURE TO SIGN A CAMPAIGN ACCOUNT CHECK TO PAY A CAMPAIGN
EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to sign a campaign account check to pay a July 3, 2016 "ATM withdrawal-Chick-fil-A-food for volunteers" campaign expenditure in the amount of \$100.00, in violation of 8-13-1312.

COUNT ONE-HUNDRED FORTY
FAILURE TO SIGN A CAMPAIGN ACCOUNT CHECK TO PAY A CAMPAIGN
EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign account check to pay a July 6, 2016 "ATM withdrawal-101 Greystone Blvd" campaign expenditure in the amount of \$300.00, in violation of 8-13-1312.

COUNT ONE-HUNDRED FORTY-ONE
FAILURE TO SIGN A CAMPAIGN ACCOUNT CHECK TO PAY A CAMPAIGN
EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign account check to pay a July 20, 2016 "Cash ewithdrawal in branch-paid canvasser Earl Brooks" campaign expenditure in the amount of \$800.00, in violation of 8-13-1312.

COUNT ONE-HUNDRED FORTY-TWO
FAILURE TO SIGN A CAMPAIGN ACCOUNT CHECK TO PAY A CAMPAIGN
EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign account check to pay a July 26, 2016 "ATM withdrawal-Subway-food for volunteers" campaign expenditure in the amount of \$200.00, in violation of 8-13-1312.

COUNT ONE-HUNDRED FORTY-THREE
FAILURE TO SIGN A CAMPAIGN ACCOUNT CHECK TO PAY A CAMPAIGN
EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign account check to pay an August 20, 2016 "ATM withdrawal-Chick-fil-A-food

for volunteers” campaign expenditure in the amount of \$300.00, in violation of 8-13-1312.

COUNT ONE-HUNDRED FORTY-FOUR
FAILURE TO SIGN A CAMPAIGN ACCOUNT CHECK TO PAY A CAMPAIGN
EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign account check to pay a December 10, 2016 “Non WF ATM withdrawal-trolley rides as “thank you” to voters” campaign expenditure in the amount of \$203.00, in violation of 8-13-1312.

COUNT ONE-HUNDRED FORTY-FIVE
FAILURE TO SIGN A CAMPAIGN ACCOUNT CHECK TO PAY A CAMPAIGN
EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign account check to pay a December 14, 2016 “ATM withdrawal-trolley rides as “thank you” to voters” campaign expenditure in the amount of \$160.00, in violation of 8-13-1312.

COUNT ONE-HUNDRED FORTY-SIX
FAILURE TO MAINTAIN RECORDS FOR CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$60.00 “ATM withdrawal-Subway-food for volunteers” on April 11, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED FORTY-SEVEN
FAILURE TO MAINTAIN RECORDS FOR CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$23.00 “Non WF ATM withdrawal-Youngs Food-food for volunteers” on April 14, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED FORTY-EIGHT
FAILURE TO MAINTAIN RECORDS FOR CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$303.00 "Non WF ATM withdrawal-Subway-food for volunteers" on April 22, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED FORTY-NINE
FAILURE TO MAINTAIN RECORDS FOR CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$480.00 "Cash ewithdrawal in branch-Sam's Club-snacks for volunteers" on May 19, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED FIFTY
FAILURE TO MAINTAIN RECORDS FOR CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$140.00 "ATM withdrawal-FedEx-campaign door knockers" on June 2, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED FIFTY-ONE
FAILURE TO MAINTAIN RECORDS FOR CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$300.00 "ATM withdrawal-Subway-food for volunteers" on June 29, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED FIFTY-TWO
FAILURE TO MAINTAIN RECORDS FOR CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail

to maintain records for a campaign expenditure in the amount of \$100.00 "ATM withdrawal-Chick-fil-A-food for volunteers" on July 3, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED FIFTY-THREE
FAILURE TO MAINTAIN RECORDS FOR CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$300.00 "ATM withdrawal-101 Greystone Blvd" on July 6, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED FIFTY-FOUR
FAILURE TO MAINTAIN RECORDS FOR CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$800.00 "Cash ewithdrawal in branch-paid canvasser Earl Brooks" on July 20, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED FIFTY-FIVE
FAILURE TO MAINTAIN RECORDS FOR CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$200.00 "ATM withdrawal-Subway-food for volunteers" on July 26, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED FIFTY-SIX
FAILURE TO MAINTAIN RECORDS FOR CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$300.00 "ATM withdrawal-Chick-fil-A-food for volunteers" on August 20, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED FIFTY-SEVEN
FAILURE TO MAINTAIN RECORDS FOR CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$203.00 "Non WF ATM withdrawal-trolley rides as "thank you" to voters" on December 10, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED FIFTY-EIGHT
FAILURE TO MAINTAIN RECORDS FOR CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$160.00 "ATM withdrawal-trolley rides as "thank you" to voters" on December 14, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED FIFTY-NINE
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSE
SECTION 8-13-1348(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, convert campaign funds to her personal use on April 15, 2016, in the amount of \$8.78, expended to Bojangles, a personal expenditure unrelated to a campaign, all in violation of Section 8-13-1348(A).

COUNT ONE-HUNDRED SIXTY
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSE
SECTION 8-13-1348(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, convert campaign funds to her personal use on May 23, 2016, in the amount of \$10.53, expended to Bojangles, a personal expenditure unrelated to a campaign, all in violation of Section 8-13-1348(A).

COUNT ONE-HUNDRED SIXTY-ONE
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSE
SECTION 8-13-1348(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, convert campaign funds to her personal use on May 24, 2016, in the amount of \$11.40, expended to Bojangles, a personal expenditure unrelated to a campaign, all in violation of Section 8-13-1348(A).

COUNT ONE-HUNDRED SIXTY-TWO
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSE
SECTION 8-13-1348(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, convert campaign funds to her personal use on June 1, 2016, in the amount of \$7.35, expended to Wendy's, a personal expenditure unrelated to a campaign, all in violation of Section 8-13-1348(A).

COUNT ONE-HUNDRED SIXTY-THREE
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSE
SECTION 8-13-1348(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, convert campaign funds to her personal use on June 2, 2016, in the amount of \$11.11 expended to Starbucks, a personal expenditure unrelated to a campaign, all in violation of Section 8-13-1348(A).

COUNT ONE-HUNDRED SIXTY-FOUR
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSE
SECTION 8-13-1348(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, convert campaign funds to her personal use on June 23, 2016, in the amount of \$3.84, expended to Zaxby's, a personal expenditure unrelated to a campaign, all in violation of Section 8-13-1348(A).

COUNT ONE-HUNDRED SIXTY-FIVE
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSE
SECTION 8-13-1348(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, convert campaign funds to her personal use on July 5, 2016, in the amount of \$3.95, expended to McDonald's, a personal expenditure unrelated to a campaign, all in violation of Section 8-13-1348(A).

COUNT ONE-HUNDRED SIXTY-SIX
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSE
SECTION 8-13-1348(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, convert campaign funds to her personal use on July 6, 2016, in the amount of \$6.14, expended to Bojangles, a personal expenditure unrelated to a campaign, all in violation of Section 8-13-1348(A).

COUNT ONE-HUNDRED SIXTY-SEVEN
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSE
SECTION 8-13-1348(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, convert campaign funds to her personal use on July 6, 2016, in the amount of \$4.72, expended to Bojangles, a personal expenditure unrelated to a campaign, all in violation of Section 8-13-1348(A).

COUNT ONE-HUNDRED SIXTY-EIGHT
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSE
SECTION 8-13-1348(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, convert campaign funds to her personal use on July 6, 2016, in the amount of \$30.52, expended to Burnettes Cleaners, a personal expenditure unrelated to a campaign, all in violation of Section 8-

13-1348(A).

COUNT ONE-HUNDRED SIXTY-NINE
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSE
SECTION 8-13-1348(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, convert campaign funds to her personal use on November 30, 2016, in the amount of \$6.64, expended to Zaxby's, a personal expenditure unrelated to a campaign, all in violation of Section 8-13-1348(A).

COUNT ONE-HUNDRED SEVENTY
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSE
SECTION 8-13-1348(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, convert campaign funds to her personal use on December 22, 2016, in the amount of \$4.00, expended to Columbia Lady Street Garage, a personal expenditure unrelated to a campaign, all in violation of Section 8-13-1348(A).

COUNT ONE-HUNDRED SEVENTY-ONE
FAILURE TO MAINTAIN A RECORDS OF CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$53.71 made at Bottle's King Wine on July 4, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED SEVENTY-TWO
FAILURE TO MAINTAIN A RECORDS OF CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$1,052.58 made at Pickrel Schaeffer on July 5, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED SEVENTY-THREE
FAILURE TO MAINTAIN A RECORDS OF CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$462.62 for Right of Setoff made on August 5, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED SEVENTY-FOUR
FAILURE TO MAINTAIN A RECORDS OF CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$186.76 for Right of Setoff made on August 23, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED SEVENTY-FIVE
FAILURE TO MAINTAIN A RECORDS OF CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$9.69 for Ph R2072 made on December 10, 2016, in violation of 8-13-1302(A).

COUNT ONE-HUNDRED SEVENTY-SIX
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT WITHIN
TEN (10) DAYS OF RECEIPT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to timely deposit a May 6, 2016 contribution from Jannie Jackson into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED SEVENTY-SEVEN
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT WITHIN
TEN (10) DAYS OF RECEIPT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to timely deposit a contribution from Anna Small into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED SEVENTY-EIGHT
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT WITHIN
TEN (10) DAYS OF RECEIPT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to timely deposit a June 8, 2016 contribution from Kathryn Oken into her campaign account, in violation of 8-13-1312.

COUNT ONE-HUNDRED SEVENTY-NINE
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT WITHIN
TEN (10) DAYS OF RECEIPT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dahli Myers, a member of the Richland County Council, did in Richland County, fail to timely deposit an October 6, 2016 contribution from SC Builder's PAC into her campaign account, in violation of 8-13-1312.

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 Regs. 24 (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.

[Redacted Signature]

Meghan L. Walker, Executive Director
State Ethics Commission

Dated this 15th day,
of February 2019.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the RESPONDENT Dahli Myers, 7758 Bluff Road, Columbia, SC 29052 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 15th day of February, 2019, by **CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED**, appropriate postage affixed, and a return address clearly indicated on said envelope.

[Redacted Signature]

Columbia, South Carolina

Richard A. Provencher, Administrative Assistant
State Ethics Commission

(803) 253-4192

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
Complaint C2017-106)
Dalhi Myers)
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, November 21, 2019 at 2:00 p.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 TIMELY FILE A STATEMENT OF ECONOMIC INTERESTS REPORT
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to timely file a 2017 Statement of Economic Interests Report by March 30, 2017, in violation of Section 8-13-1140.

COUNT TWO
FAILURE TO DISCLOSE CONTRIBUTIONS IN CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail

to disclose, in a certified campaign disclosure report, campaign contributions received in April 2016 from Elizabeth Portee (\$250), Martha Brown (\$250), John Geltum (\$500), John Van Duys (\$100), James Becker (\$200), William Reamer Johnson (\$200), William C. Boyd (\$250), Steve Matthews (\$250), Thomas Elliot (\$100), and Ruth Johnson (\$50), for a total of \$2,150, all in violation of Section 8-13-1308(F).

COUNT THREE
**FAILURE TO DISCLOSE CONTRIBUTIONS IN CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, campaign contributions received in May 2016 from Andrew Taslitz (\$27), Krystal Connor (\$250), Audrey Lynn (\$250), Adrienne Sicacowski (\$250), and Leroy Green (\$500), for a total of \$1,277, all in violation of Section 8-13-1308(F).

COUNT FOUR
**FAILURE TO DISCLOSE CONTRIBUTIONS IN CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, campaign contributions received in June 2016 from John Boyd (\$100), Donald Dial, Jr. (\$200), Steve Matthews (\$200), EC Ownings (\$500), Anna H. Small (\$500), and Mary Hipp (\$500), for a total of \$2,000, all in violation of Section 8-13-1308(F).

COUNT FIVE
**FAILURE TO DISCLOSE CONTRIBUTION IN CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, a contribution in the amount of \$500 from

Kathryn Oken that was deposited in her campaign account on August 18, 2016, in violation of Section 8-13-1308(F).

COUNT SIX
FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, a December 7, 2016 contribution of \$500 from SC Builder's PAC, in violation of Section 8-13-1308(F).

COUNT SEVEN
FAILURE TO DISCLOSE EXPENDITURES ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, campaign expenditures made in April 2016 to JDs Place (\$22.92), FedEx Office (\$613.73), Fresh Market (\$112.17), Young's (\$20), Zaxby's (\$35.48), Velvetex (\$91.80), Print House Plus (\$350.31), Longhorn Steak (\$57.78), Ruby Tuesday (\$80.86), IHOP (\$30.72), Shell (\$6.08), Office Depot (\$46.74), Shoney's (\$27.29), and Sam's Club (\$161.39), for a total of \$1,641.27, all in violation of Section 8-13-1308(F).

COUNT EIGHT
FAILURE TO DISCLOSE EXPENDITURES ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, campaign expenditures made in May 2016 to Balloons Tomorrow (\$318), Congaree Convenience (\$11.43), CVS (\$21.59), Sam's (\$132.50), Lowe's (\$81.04), Sam's (\$39.44), Gravis Marketing (\$1,600), Gravis Marketing (\$900), Horse Garden Ace (\$36.16), Belk (\$30.24), FedEx Office (\$429.96), Sam's (\$136.95), McDonald's (\$25.35), Murphy (\$29.02), Party City (\$76.59), Wal-Mart (\$660), Gravis Marketing (\$1,000),

and JD's Place (\$80.61) for a total of \$4,955.48, all in violation of Section 8-13-1308(F).

COUNT NINE
FAILURE TO DISCLOSE EXPENDITURES ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, campaign expenditures made in June 2016 to California Dreaming (\$62.03), JD's Place (\$85.71), JD's Place (\$208.65), Krispy Kreme (\$36.63), Little Caesar's (\$39.60), Short Trip (\$14.32), Staples (\$264.60), Dollar Tree (\$32.40), FedEx Office (\$12.60), Staples (\$21.87), Dr. Don's Buttons (\$443.39), FedEx Office (\$3.03), Gravis Marketing (\$1,000), FedEx Office (\$388.60), and Cola's (\$92.40), for a total of \$2,705.83, all in violation of Section 8-13-1308(F).

COUNT TEN
FAILURE TO DISCLOSE EXPENDITURES ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, campaign expenditures in July 2016 to Walgreen's (\$42.82), TNT Fireworks (\$259.18), FedEx Office (\$36.89), Wendy's (\$16.89), Cromer's Retail (\$74.27), Family Dollar (\$64.48), Don Guilliard (\$241.85), Don Guilliard (\$205.12), Midway Citgo (\$38.72), for a total of \$980.22, all in violation of Section 8-13-1308(F).

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

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, an August 20, 2016 expenditure for "ice and cooler" in the amount of \$12.24 to Bi-Lo, in violation of Section 8-13-1308(F).

COUNT TWELVE
FAILURE TO DISCLOSE EXPENDITURES ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, expenditures made in December 2016 to Waffle House (\$58.85) and Dollar Tree (\$55.21), all in violation of Section 8-13-1308(F).

COUNT THIRTEEN
FAILURE TO DEPOSIT CONTRIBUTIONS INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to deposit personal contributions totaling \$50,546.50 into her campaign account, in violation of 8-13-1312.

COUNT FOURTEEN
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to deposit April 16 and April 30, 2016 campaign contributions of \$1,000 from Theodore Myers, Sr. into her campaign account, in violation of 8-13-1312.

COUNT FIFTEEN
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 16, 2016 campaign contribution of \$1,000.00 and a June 1, 2016 campaign contribution of \$1,000 from Nan Myers into her campaign account, in violation of 8-13-1312.

COUNT SIXTEEN
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail

to deposit an April 16, 2016 campaign contribution of \$1,000 from Sonya Myers Crawford into her campaign account, in violation of 8-13-1312.

COUNT SEVENTEEN
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 16, 2016 campaign contribution of \$500 from Theodore Myers, Jr. into her campaign account, in violation of 8-13-1312.

COUNT EIGHTEEN
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 16, 2016 campaign contribution of \$50 from Reginald Alexander into her campaign account, in violation of 8-13-1312.

COUNT NINETEEN
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to deposit a June 1, 2016 campaign contribution of \$1,000 from Robert F. Garrick into her campaign account, in violation of 8-13-1312.

COUNT TWENTY
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay an April 16, 2016 campaign expenditure of \$1,140 to "purchase signs" from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-ONE
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay an April 21, 2016 campaign expenditure of \$500 to “purchase signs” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-TWO
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 1, 2016 campaign expenditure of \$5,200 for “sign purchase” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-THREE
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 1, 2016 campaign expenditure of \$7,700 for “signs” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-FOUR
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 7, 2016 campaign expenditure in the amount of \$7,700 to “purchase signage” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-FIVE
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail

to pay a May 7, 2016 campaign expenditure in the amount of \$1,420 for “radio advertising” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-SIX
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 7, 2016 campaign expenditure of \$12,200 for “campaign mailers and live calls” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-SEVEN
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 7, 2016 campaign expenditure of \$140 for “additional radio advertising” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-EIGHT
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 7, 2016 campaign expenditure of \$5,500 for “live calls” from her campaign account, in violation of 8-13-1312

COUNT TWENTY-NINE
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 10, 2016 campaign expenditure of \$6,892.50 for “printing palm cards” from her campaign account, in violation of 8-13-1312.

COUNT THIRTY
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a June 2, 2016 campaign expenditure of \$12,200 for “direct mail and live calls” from her campaign account, in violation of 8-13-1312.

COUNT THIRTY-ONE
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a June 7, 2016 campaign expenditure of \$1,420 for “radio advertising” from her campaign account, in violation of 8-13-1312.

COUNT THIRTY-TWO
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a June 7, 2016 campaign expenditure of \$1,420 for “radio advertising” from her campaign account, in violation of 8-13-1312.

COUNT THIRTY-THREE
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay an April 11, 2016 “ATM withdrawal-Subway-food for volunteers” campaign expenditure in the amount of \$60, in violation of 8-13-1312.

COUNT THIRTY-FOUR
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail

to sign a campaign check to pay an April 14, 2016 “Non WF ATM withdrawal-Youngs Food-food for volunteers” campaign expenditure in the amount of \$23, in violation of 8-13-1312.

COUNT THIRTY-FIVE
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay an April 22, 2016 “Non WF ATM withdrawal-Subway-food for volunteers” campaign expenditure in the amount of \$303, in violation of 8-13-1312.

COUNT THIRTY-SIX
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a May 19, 2016 “Cash e-withdrawal in branch-Sam’s Club-snacks for volunteers” campaign expenditure in the amount of \$480, in violation of 8-13-1312.

COUNT THIRTY-SEVEN
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a June 2, 2016 “ATM withdrawal-FedEx-campaign door knockers” campaign expenditure in the amount of \$140, in violation of 8-13-1312.

COUNT THIRTY-EIGHT
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a June 29, 2016 “ATM withdrawal-Subway-food for volunteers” campaign expenditure in the amount of \$300, in violation of 8-13-1312.

COUNT THIRTY-NINE
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a July 3, 2016 “ATM withdrawal-Chick-fil-A-food for volunteers” campaign expenditure in the amount of \$100, in violation of 8-13-1312.

COUNT FORTY
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a July 6, 2016 “ATM withdrawal-101 Greystone Blvd” campaign expenditure in the amount of \$300, in violation of 8-13-1312.

COUNT FORTY-ONE
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a July 20, 2016 “Cash e-withdrawal in branch-paid canvasser Earl Brooks” campaign expenditure in the amount of \$800, in violation of 8-13-1312.

COUNT FORTY-TWO
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a July 26, 2016 “ATM withdrawal-Subway-food for volunteers” campaign expenditure in the amount of \$200, in violation of 8-13-1312.

COUNT FORTY-THREE
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay an August 20, 2016 "ATM withdrawal-Chick-fil-A-food for volunteers" campaign expenditure in the amount of \$300, in violation of 8-13-1312.

COUNT FORTY-FOUR
FAILURE TO MAINTAIN A RECORD OF CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$53.71 made at Bottle's King Wine on July 4, 2016, in violation of 8-13-1302(A).

COUNT FORTY-FIVE
FAILURE TO MAINTAIN A RECORD OF CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$1,052.58 made at Pickrel Schaeffer on July 5, 2016, in violation of 8-13-1302(A).

COUNT FORTY-SIX
FAILURE TO MAINTAIN A RECORD OF CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for two campaign expenditures totaling \$649.38 for "Right of Setoff" made on August 5 and 23, 2016, in violation of 8-13-1302(A).

COUNT FORTY-SEVEN
FAILURE TO TIMELY DEPOSIT CONTRIBUTIONS INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to timely deposit a May 6, 2016 contribution from Jannie Jackson, a June 8, 2016 contribution from Kathryn Oken, and an October 6, 2016 contribution from the SC Builder's PAC into her

campaign account, in violation of 8-13-1312.

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.

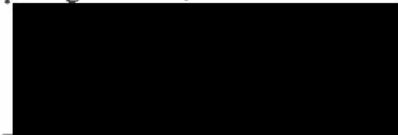


Meghan L. Walker, Executive Director
State Ethics Commission

Dated this 12th day,
of August 2019.

Certificate of Service by Certified Mail

I hereby certify that a copy of this NOTICE OF HEARING was duly served on the RESPONDENT Dalhi Myers, 7758 Bluff Road, Columbia, SC 29052 by depositing said NOTICE OF HEARING in the United States mail, Columbia, South Carolina on this 13th day of August 2019, by CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED, appropriate postage affixed, and a return address clearly indicated on said envelope.



Richard A. Provencher, Administrative Assistant
State Ethics Commission (803) 253-4192

Columbia, South Carolina

STATE OF SOUTH CAROLINA)
)
RICHLAND COUNTY)
)
IN THE MATTER OF:)
Dahli Myers,)
)
Respondent,)
)
)
State Ethics Commission,)
)
)
Complainant.)
_____)

BEFORE THE STATE ETHICS COMMISSION

COMPLAINT NO.: C17-106

RESPONDANT'S ANSWER TO THE
NOTICE OF HEARING

RECEIVED
2019 APR 17 PM 12:49
STATE ETHICS
COMMISSION

Respondent, Dahli Myers ("Respondent"), states that the properly named Respondent should be Dahli Myers, and answering Complainant's allegations, states the following:

FOR A FIRST DEFENSE

1. Each and every allegation set forth within the Notice of Hearing not specifically admitted herein is denied.
2. As to the allegations set forth in Count One, Respondent admits only so much as alleges that this action has been brought involving her filings related to six elections during the extraordinary 2016 cycle in which she appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day. Respondent denies the remaining allegations set forth in Count One.
3. As to the allegations set forth in in each and every enumerated Count, Respondent admits only so much as alleges that this action has been brought involving her filings related to six elections during the extraordinary 2016 cycle in which she appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day. Respondent denies the remaining allegations set forth in each allegation.

4. As to all allegations of Respondent's "Failure to Disclose Contribution on Campaign Disclosure Report," Respondent admits only so much of the Complaint as to make clear that her filings were made during the Summer and Fall of 2016, when appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day, in less than six months. Respondent alleges that while her campaign filings are confusing and admittedly incorrect in some places, that no one, including the Ethics Commission staff (with whom Respondent spent two full days attempting to decipher the proper filings), was able to intelligibly discern her appropriate filing schedule given the unique circumstances surrounding her unfairly compressed election cycles.

5. In response to all allegations of Respondent's "Failure to Disclose Expenditure on Campaign Disclosure Report," Respondent admits only so much of the Complaint as to make clear that her filings were made during the Summer and Fall of 2016, when appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day, in less than six months. Respondent alleges that while her campaign filings are confusing and admittedly incorrect in some places, that no one, including the Ethics Commission staff (with whom Respondent spent two full days attempting to decipher the proper filings), was able to intelligibly discern her appropriate filing schedule given the unique circumstances surrounding her unfairly compressed election cycles.

6. In response to all allegations of Respondent's "Failure to Deposit Campaign Contribution into Campaign Account," Respondent admits only so much of the Complaint as to make clear that her filings were made during the Summer and Fall of 2016, when she appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day, in less than six months. Respondent alleges that while her campaign filings are confusing and admittedly

incorrect in some places, that no one, including the Ethics Commission staff (with whom Respondent spent two full days attempting to decipher the proper filings), was able to intelligibly discern her appropriate filing schedule given the unique circumstances surrounding her unfairly compressed election cycles.

7. In response to all allegations One Hundred-Fifteen through One Hundred Thirty-Three, Failure to Pay Campaign Expenditure From Campaign Account” and/or “Failure to Sign A Campaign Check To Pay Campaign Expenditure,”, all of which relate to the expenditure of Respondent’s personal funds for campaign related expenses, Respondent admits only so much of the Complaint as to make clear that these erroneous filings were made at the direction of Ethics Commission Staff, following the Summer and Fall of 2016, when she appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day, in less than six months. Respondent alleges that while her campaign filings are confusing and admittedly incorrect in some places, that no one, including the Ethics Commission staff (with whom Respondent spent two full days attempting to decipher the proper filings), was able to intelligibly discern her appropriate filings and/or filing schedule given the unique circumstances surrounding her unfairly compressed election cycles.

8. As to the allegations of Respondent’s “Use of Campaign Funds For Personal Expense,” Counts One-Hundred Sixty-One through One-Hundred Seventy-One, Respondent admits only so much of the Complaint as to make clear that her filings were made during the Summer and Fall of 2016, when appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day, in less than six months. At no time did Respondent use campaign funds for personal expenses. Respondent alleges that while her campaign filings are confusing and admittedly incorrect in some places, that no one, including the staff of the Ethics Commission

staff (with whom Respondent spent two full days attempting to decipher the proper filings), was able to intelligibly discern her appropriate filing schedule given the unique circumstances surrounding her unfairly compressed election cycles.

9. As to all allegations of Respondent's "Failure to Deposit Contribution Into Campaign Account Within Ten Days of Receipt," Respondent admits only so much of the Complaint as to make clear that her filings were made during the Summer and Fall of 2016, when appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day, in less than six months. Respondent alleges that while her campaign filings are confusing and admittedly incorrect in some places, that no one, including the staff of the Ethics Commission staff (with whom Respondent spent two full days attempting to decipher the proper filings), was able to intelligibly discern her appropriate filing schedule given the unique circumstances surrounding her unfairly compressed election cycles.

10. In response to count One-Hundred Seventy-Two, Respondent denies the allegations set forth and alleges in response that neither she nor her campaign have any connection to the named entity.

FOR A SECOND DEFENSE

11. Respondent submits that all entries made were so made in good faith and in consultation with employees of the Ethics Commission. Given the unique nature of her single year election cycle, comprised of *six separate elections (two of which occurred on the same day)*, unique in South Carolina history and practice, her filings are and will remain utterly confused. Indeed, even members of the Ethics Commission have been unable to guide Respondent accurately in her filings.

12. Respondent gives notice of the intent to assert any further affirmative defenses that any investigation supports, including, but not limited to, defenses that the action is barred in whole or in part by any applicable statute, contract, release, covenant, or the doctrine of laches. Thus, Respondent reserves the right to amend this pleading to assert any such defenses.

13. Respondent requests a meeting with the General Counsel and the Director of the Commission to resolve these issues and bring this matter to a close.

WHEREFORE, having answered, Respondent asks this Commission to dismiss the allegations against her and to grant such other and further relief as this Court deems just and proper.



Dalhi N. Myers
7758 Bluff Road
Gadsden, South Carolina 29052
Telephone: 803-240-6559
Dalhi31@gmail.com

April 5, 2019

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
Complaint C2017-106)
Dalhi Myers)
Respondent.)
State Ethics Commission)
Complainant.)
_____)

BEFORE THE STATE ETHICS COMMISSION

**AMENDED
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, January 16, 2020 at 2:00 p.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 TIMELY FILE A STATEMENT OF ECONOMIC INTERESTS REPORT
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to timely file a 2017 Statement of Economic Interests Report by March 30, 2017, in violation of Section 8-13-1140.

COUNT TWO
FAILURE TO DISCLOSE CONTRIBUTIONS IN CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail

to disclose, in a certified campaign disclosure report, campaign contributions received in April 2016 from Elizabeth Portee (\$250), Martha Brown (\$250), John Geltum (\$500), John Van Duys (\$100), James Becker (\$200), William Reamer Johnson (\$200), William C. Boyd (\$250), Steve Matthews (\$250), Thomas Elliot (\$100), and Ruth Johnson (\$50), for a total of \$2,150, all in violation of Section 8-13-1308(F).

COUNT THREE
**FAILURE TO DISCLOSE CONTRIBUTIONS IN CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, campaign contributions received in May 2016 from Andrew Taslitz (\$27), Krystal Connor (\$250), Audrey Lynn (\$250), Adrienne Sicacowski (\$250), and Leroy Green (\$500), for a total of \$1,277, all in violation of Section 8-13-1308(F).

COUNT FOUR
**FAILURE TO DISCLOSE CONTRIBUTIONS IN CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, campaign contributions received in June 2016 from John Boyd (\$100), Donald Dial, Jr. (\$200), Steve Matthews (\$200), EC Ownings (\$500), Anna H. Small (\$500), and Mary Hipp (\$500), for a total of \$2,000, all in violation of Section 8-13-1308(F).

COUNT FIVE
**FAILURE TO DISCLOSE CONTRIBUTION IN CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, a contribution in the amount of \$500 from

Kathryn Oken that was deposited in her campaign account on August 18, 2016, in violation of Section 8-13-1308(F).

COUNT SIX
**FAILURE TO DISCLOSE CONTRIBUTION ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, a December 7, 2016 contribution of \$500 from SC Builder's PAC, in violation of Section 8-13-1308(F).

COUNT SEVEN
**FAILURE TO DISCLOSE EXPENDITURES ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, campaign expenditures made in April 2016 to JDs Place (\$22.92), FedEx Office (\$613.73), Fresh Market (\$112.17), Young's (\$20), Zaxby's (\$35.48), Velvetex (\$91.80), Print House Plus (\$350.31), Longhorn Steak (\$57.78), Ruby Tuesday (\$80.86), IHOP (\$30.72), Shell (\$6.08), Office Depot (\$46.74), Shoney's (\$27.29), and Sam's Club (\$161.39), for a total of \$1,641.27, all in violation of Section 8-13-1308(F).

COUNT EIGHT
**FAILURE TO DISCLOSE EXPENDITURES ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED**

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, campaign expenditures made in May 2016 to Balloons Tomorrow (\$318), Congaree Convenience (\$11.43), CVS (\$21.59), Sam's (\$132.50), Lowe's (\$81.04), Sam's (\$39.44), Gravis Marketing (\$1,600), Gravis Marketing (\$900), Horse Garden Ace (\$36.16), Belk (\$30.24), FedEx Office (\$429.96), Sam's (\$136.95), McDonald's (\$25.35), Murphy (\$29.02), Party City (\$76.59), Wal-Mart (\$660), Gravis Marketing (\$1,000),

and JD's Place (\$80.61) for a total of \$4,955.48, all in violation of Section 8-13-1308(F).

COUNT NINE
FAILURE TO DISCLOSE EXPENDITURES ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, campaign expenditures made in June 2016 to California Dreaming (\$62.03), JD's Place (\$85.71), JD's Place (\$208.65), Krispy Kreme (\$36.63), Little Caesar's (\$39.60), Short Trip (\$14.32), Staples (\$264.60), Dollar Tree (\$32.40), FedEx Office (\$12.60), Staples (\$21.87), Dr. Don's Buttons (\$443.39), FedEx Office (\$3.03), Gravis Marketing (\$1,000), FedEx Office (\$388.60), and Cola's (\$92.40), for a total of \$2,705.83, all in violation of Section 8-13-1308(F).

COUNT TEN
FAILURE TO DISCLOSE EXPENDITURES ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, campaign expenditures in July 2016 to Walgreen's (\$42.82), TNT Fireworks (\$259.18), FedEx Office (\$36.89), Wendy's (\$16.89), Cromer's Retail (\$74.27), Family Dollar (\$64.48), Don Guilliard (\$241.85), Don Guilliard (\$205.12), Midway Citgo (\$38.72), for a total of \$980.22, all in violation of Section 8-13-1308(F).

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

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, an August 20, 2016 expenditure for "ice and cooler" in the amount of \$12.24 to Bi-Lo, in violation of Section 8-13-1308(F).

COUNT TWELVE
FAILURE TO DISCLOSE EXPENDITURES ON CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to disclose, in a certified campaign disclosure report, expenditures made in December 2016 to Waffle House (\$58.85) and Dollar Tree (\$55.21), all in violation of Section 8-13-1308(F).

COUNT THIRTEEN
FAILURE TO DEPOSIT CONTRIBUTIONS INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to deposit personal contributions totaling \$50,546.50 into her campaign account, in violation of 8-13-1312.

COUNT FOURTEEN
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to deposit April 16 and April 30, 2016 campaign contributions of \$1,000 from Theodore Myers, Sr. into her campaign account, in violation of 8-13-1312.

COUNT FIFTEEN
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 16, 2016 campaign contribution of \$1,000.00 and a June 1, 2016 campaign contribution of \$1,000 from Nan Myers into her campaign account, in violation of 8-13-1312.

COUNT SIXTEEN
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail

to deposit an April 16, 2016 campaign contribution of \$1,000 from Sonya Myers Crawford into her campaign account, in violation of 8-13-1312.

COUNT SEVENTEEN
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 16, 2016 campaign contribution of \$500 from Theodore Myers, Jr. into her campaign account, in violation of 8-13-1312.

COUNT EIGHTEEN
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to deposit an April 16, 2016 campaign contribution of \$50 from Reginald Alexander into her campaign account, in violation of 8-13-1312.

COUNT NINETEEN
FAILURE TO DEPOSIT CONTRIBUTION INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to deposit a June 1, 2016 campaign contribution of \$1,000 from Robert F. Garrick into her campaign account, in violation of 8-13-1312.

COUNT TWENTY
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay an April 16, 2016 campaign expenditure of \$1,140 to "purchase signs" from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-ONE
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay an April 21, 2016 campaign expenditure of \$500 to “purchase signs” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-TWO
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 1, 2016 campaign expenditure of \$5,200 for “sign purchase” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-THREE
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 1, 2016 campaign expenditure of \$7,700 for “signs” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-FOUR
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 7, 2016 campaign expenditure in the amount of \$7,700 to “purchase signage” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-FIVE
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail

to pay a May 7, 2016 campaign expenditure in the amount of \$1,420 for “radio advertising” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-SIX
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 7, 2016 campaign expenditure of \$12,200 for “campaign mailers and live calls” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-SEVEN
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 7, 2016 campaign expenditure of \$140 for “additional radio advertising” from her campaign account, in violation of 8-13-1312.

COUNT TWENTY-EIGHT
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 7, 2016 campaign expenditure of \$5,500 for “live calls” from her campaign account, in violation of 8-13-1312

COUNT TWENTY-NINE
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a May 10, 2016 campaign expenditure of \$6,892.50 for “printing palm cards” from her campaign account, in violation of 8-13-1312.

COUNT THIRTY
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a June 2, 2016 campaign expenditure of \$12,200 for "direct mail and live calls" from her campaign account, in violation of 8-13-1312.

COUNT THIRTY-ONE
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a June 7, 2016 campaign expenditure of \$1,420 for "radio advertising" from her campaign account, in violation of 8-13-1312.

COUNT THIRTY-TWO
FAILURE TO PAY EXPENDITURE FROM CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to pay a June 7, 2016 campaign expenditure of \$1,420 for "radio advertising" from her campaign account, in violation of 8-13-1312.

COUNT THIRTY-THREE
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay an April 11, 2016 "ATM withdrawal-Subway-food for volunteers" campaign expenditure in the amount of \$60, in violation of 8-13-1312.

COUNT THIRTY-FOUR
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail

to sign a campaign check to pay an April 14, 2016 “Non WF ATM withdrawal-Youngs Food-food for volunteers” campaign expenditure in the amount of \$23, in violation of 8-13-1312.

COUNT THIRTY-FIVE
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay an April 22, 2016 “Non WF ATM withdrawal-Subway-food for volunteers” campaign expenditure in the amount of \$303, in violation of 8-13-1312.

COUNT THIRTY-SIX
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a May 19, 2016 “Cash e-withdrawal in branch-Sam’s Club-snacks for volunteers” campaign expenditure in the amount of \$480, in violation of 8-13-1312.

COUNT THIRTY-SEVEN
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a June 2, 2016 “ATM withdrawal-FedEx-campaign door knockers” campaign expenditure in the amount of \$140, in violation of 8-13-1312.

COUNT THIRTY-EIGHT
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a June 29, 2016 “ATM withdrawal-Subway-food for volunteers” campaign expenditure in the amount of \$300, in violation of 8-13-1312.

COUNT THIRTY-NINE
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a July 3, 2016 “ATM withdrawal-Chick-fil-A-food for volunteers” campaign expenditure in the amount of \$100, in violation of 8-13-1312.

COUNT FORTY
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a July 6, 2016 “ATM withdrawal-101 Greystone Blvd” campaign expenditure in the amount of \$300, in violation of 8-13-1312.

COUNT FORTY-ONE
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a July 20, 2016 “Cash e-withdrawal in branch-paid canvasser Earl Brooks” campaign expenditure in the amount of \$800, in violation of 8-13-1312.

COUNT FORTY-TWO
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to sign a campaign check to pay a July 26, 2016 “ATM withdrawal-Subway-food for volunteers” campaign expenditure in the amount of \$200, in violation of 8-13-1312.

COUNT FORTY-THREE
FAILURE TO SIGN CAMPAIGN CHECK TO PAY CAMPAIGN EXPENDITURE
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail

to sign a campaign check to pay an August 20, 2016 “ATM withdrawal-Chick-fil-A-food for volunteers” campaign expenditure in the amount of \$300, in violation of 8-13-1312.

COUNT FORTY-FOUR
FAILURE TO MAINTAIN A RECORD OF CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$53.71 made at Bottle’s King Wine on July 4, 2016, in violation of 8-13-1302(A).

COUNT FORTY-FIVE
FAILURE TO MAINTAIN A RECORD OF CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for a campaign expenditure in the amount of \$1,052.58 made at Pickrel Schaeffer on July 5, 2016, in violation of 8-13-1302(A).

COUNT FORTY-SIX
FAILURE TO MAINTAIN A RECORD OF CAMPAIGN EXPENDITURE
SECTION 8-13-1302(A), S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to maintain records for two campaign expenditures totaling \$649.38 for “Right of Setoff” made on August 5 and 23, 2016, in violation of 8-13-1302(A).

COUNT FORTY-SEVEN
FAILURE TO TIMELY DEPOSIT CONTRIBUTIONS INTO CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Dalhi Myers, a member of the Richland County Council, did in Richland County, fail to timely deposit a May 6, 2016 contribution from Jannie Jackson, a June 8, 2016 contribution from Kathryn Oken, and an October 6, 2016 contribution from the SC Builder’s PAC into her campaign account, in violation of 8-13-1312.

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 October 2019.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **AMENDED NOTICE OF HEARING** was duly served on the RESPONDENT Dalhi Myers, 7758 Bluff Road, Columbia, SC 29052 by depositing said **AMENDED NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 31st day of October 2019, by CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED, appropriate postage affixed, and a return address clearly indicated on said envelope.



Columbia, South Carolina

Richard A. Provencher, Administrative Assistant
State Ethics Commission (803) 253-4192

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
COMPLAINT C2017-106)
State Ethics Commission,)
Complainant.)
Dalhi Myers,)
Respondent.)
_____)

BEFORE THE STATE ETHICS COMMISSION

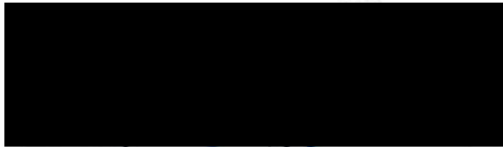
**ORDER GRANTING
RESPONDENT'S MOTION FOR A
CONTINUANCE**

The above-captioned matter was called for a hearing on January 16, 2020 before Commissioners Brandolyn Thomas Pinkston, Victor K. Li, and Childs Cantey Thrasher, Hearing Panel (Panel) Chair. At the call of the case, Respondent verbally moved the Panel for a continuance, citing additional time needed to obtain legal counsel as the basis for her motion. Commission staff stated no objection.

The Panel hereby continues this matter to May 21, 2020, and directs Respondent to obtain legal counsel within thirty (30) days.

AND IT IS SO ORDERED THIS 16 DAY OF January 2020.

STATE ETHICS COMMISSION



CHILD'S CANTEY THRASHER
HEARING CHAIR

Columbia, South Carolina

STATE OF SOUTH CAROLINA)
)
RICHLAND COUNTY)
)
IN THE MATTER OF:)
Dahli Myers,)
)
Respondent,)
)
)
State Ethics Commission,)
)
)
Complainant.)
_____)

BEFORE THE STATE ETHICS COMMISSION

COMPLAINT NO.: C17-106

RESPONDANT'S ANSWER TO THE
NOTICE OF HEARING

RECEIVED
2019 APR 17 PM 12:49
STATE ETHICS
COMMISSION

Respondent, Dahli Myers ("Respondent"), states that the properly named Respondent should be Dahli Myers, and answering Complainant's allegations, states the following:

FOR A FIRST DEFENSE

1. Each and every allegation set forth within the Notice of Hearing not specifically admitted herein is denied.
2. As to the allegations set forth in Count One, Respondent admits only so much as alleges that this action has been brought involving her filings related to six elections during the extraordinary 2016 cycle in which she appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day. Respondent denies the remaining allegations set forth in Count One.
3. As to the allegations set forth in in each and every enumerated Count, Respondent admits only so much as alleges that this action has been brought involving her filings related to six elections during the extraordinary 2016 cycle in which she appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day. Respondent denies the remaining allegations set forth in each allegation.

4. As to all allegations of Respondent's "Failure to Disclose Contribution on Campaign Disclosure Report," Respondent admits only so much of the Complaint as to make clear that her filings were made during the Summer and Fall of 2016, when appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day, in less than six months. Respondent alleges that while her campaign filings are confusing and admittedly incorrect in some places, that no one, including the Ethics Commission staff (with whom Respondent spent two full days attempting to decipher the proper filings), was able to intelligibly discern her appropriate filing schedule given the unique circumstances surrounding her unfairly compressed election cycles.

5. In response to all allegations of Respondent's "Failure to Disclose Expenditure on Campaign Disclosure Report," Respondent admits only so much of the Complaint as to make clear that her filings were made during the Summer and Fall of 2016, when appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day, in less than six months. Respondent alleges that while her campaign filings are confusing and admittedly incorrect in some places, that no one, including the Ethics Commission staff (with whom Respondent spent two full days attempting to decipher the proper filings), was able to intelligibly discern her appropriate filing schedule given the unique circumstances surrounding her unfairly compressed election cycles.

6. In response to all allegations of Respondent's "Failure to Deposit Campaign Contribution into Campaign Account," Respondent admits only so much of the Complaint as to make clear that her filings were made during the Summer and Fall of 2016, when she appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day, in less than six months. Respondent alleges that while her campaign filings are confusing and admittedly

incorrect in some places, that no one, including the Ethics Commission staff (with whom Respondent spent two full days attempting to decipher the proper filings), was able to intelligibly discern her appropriate filing schedule given the unique circumstances surrounding her unfairly compressed election cycles.

7. In response to all allegations One Hundred-Fifteen through One Hundred Thirty-Three, Failure to Pay Campaign Expenditure From Campaign Account” and/or “Failure to Sign A Campaign Check To Pay Campaign Expenditure,”, all of which relate to the expenditure of Respondent’s personal funds for campaign related expenses, Respondent admits only so much of the Complaint as to make clear that these erroneous filings were made at the direction of Ethics Commission Staff, following the Summer and Fall of 2016, when she appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day, in less than six months. Respondent alleges that while her campaign filings are confusing and admittedly incorrect in some places, that no one, including the Ethics Commission staff (with whom Respondent spent two full days attempting to decipher the proper filings), was able to intelligibly discern her appropriate filings and/or filing schedule given the unique circumstances surrounding her unfairly compressed election cycles.

8. As to the allegations of Respondent’s “Use of Campaign Funds For Personal Expense,” Counts One-Hundred Sixty-One through One-Hundred Seventy-One, Respondent admits only so much of the Complaint as to make clear that her filings were made during the Summer and Fall of 2016, when appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day, in less than six months. At no time did Respondent use campaign funds for personal expenses. Respondent alleges that while her campaign filings are confusing and admittedly incorrect in some places, that no one, including the staff of the Ethics Commission

staff (with whom Respondent spent two full days attempting to decipher the proper filings), was able to intelligibly discern her appropriate filing schedule given the unique circumstances surrounding her unfairly compressed election cycles.

9. As to all allegations of Respondent's "Failure to Deposit Contribution Into Campaign Account Within Ten Days of Receipt," Respondent admits only so much of the Complaint as to make clear that her filings were made during the Summer and Fall of 2016, when appeared on a ballot six times, on one occasion, appearing on two separate ballots on the same day, in less than six months. Respondent alleges that while her campaign filings are confusing and admittedly incorrect in some places, that no one, including the staff of the Ethics Commission staff (with whom Respondent spent two full days attempting to decipher the proper filings), was able to intelligibly discern her appropriate filing schedule given the unique circumstances surrounding her unfairly compressed election cycles.

10. In response to count One-Hundred Seventy-Two, Respondent denies the allegations set forth and alleges in response that neither she nor her campaign have any connection to the named entity.

FOR A SECOND DEFENSE

11. Respondent submits that all entries made were so made in good faith and in consultation with employees of the Ethics Commission. Given the unique nature of her single year election cycle, comprised of *six separate elections (two of which occurred on the same day)*, unique in South Carolina history and practice, her filings are and will remain utterly confused. Indeed, even members of the Ethics Commission have been unable to guide Respondent accurately in her filings.

12. Respondent gives notice of the intent to assert any further affirmative defenses that any investigation supports, including, but not limited to, defenses that the action is barred in whole or in part by any applicable statute, contract, release, covenant, or the doctrine of laches. Thus, Respondent reserves the right to amend this pleading to assert any such defenses.

13. Respondent requests a meeting with the General Counsel and the Director of the Commission to resolve these issues and bring this matter to a close.

WHEREFORE, having answered, Respondent asks this Commission to dismiss the allegations against her and to grant such other and further relief as this Court deems just and proper.

[REDACTED]

Dalhi N. Myers
7758 Bluff Road
Gadsden, South Carolina 29052
Telephone: 803-240-6559
Dalhi31@gmail.com

April 5, 2019

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
COMPLAINT C2017-106)
State Ethics Commission,)
Complainant.)
Dalhi Myers,)
Respondent.)

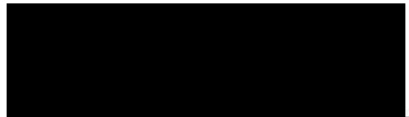
BEFORE THE STATE ETHICS COMMISSION

**ORDER GRANTING
RESPONDENT'S MOTION TO
HOLD IN ABEYANCE**

The above-captioned matter was called for a hearing on February 18, 2021. Prior to the call of the case, Respondent's counsel moved to hold this matter in abeyance in light of Respondent's recent criminal indictment in State Grand Jury Case 2020-GS-47-21, State of South Carolina v. Dalhi Nanette Myers. Commission staff stated no objection. This matter is hereby held in abeyance pending resolution of State Grand Jury Case 2020-GS-47-21.

AND IT IS SO ORDERED THIS 21 DAY OF January 2021.

STATE ETHICS COMMISSION



CHILDS CANTEY THRASHER
HEARING CHAIR

Columbia, South Carolina