

STATE OF SOUTH CAROLINA
STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:

CASE NUMBER

C 2025-061

COMPLAINT FORM

COMPLAINANT: Catherine Huddle

RESPONDENT: Kevin Scully

ADDRESS: [REDACTED]

ADDRESS: [REDACTED]

TELEPHONE NUMBER: 803-665-3109 29036

TELEPHONE NUMBER: 678-787-1414

TITLE: Trustee, LRS

TITLE: Trustee, Lex Rich Five

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

See Attached

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

STATE OF SOUTH CAROLINA

COUNTY OF Lexington

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

Sworn to and subscribed before me this 17 day of June, 2025



Clayton Thigpen

Notary Public for South Carolina
Commission Expires: 04/25/2034

[REDACTED SIGNATURE]
Complainant Signature

Notary Public for South Carolina

My Commission expires 4/25/2034

SEC-7 (Revised 3/2022)

REPLY TO: 201 Executive Center Drive, Suite 150, Columbia, South Carolina 29210 (803)253-4192

ELECTRONIC COPIES WILL NOT BE ACCEPTED

C102form

Mr. Kevin Scully ran for election to a Richland County seat on the School Board for School District Five of Lexington and Richland Counties in the fall of 2022.

It appears that Mr. Scully violated the following SC Ethics Laws on multiple occasions:

SECTION 8-13-1302 Maintenance of records of contributions, contributors, and expenditures and **SECTION 8-13-1309**. Certified campaign reports; filing; contents

Rationale:

- 1) Mr. Scully received Robo Call and mass text message services from Tige Watts/Campaign Research and Strategy on 11/3/22 for the November 2022 election (see email Exhibits 1, 2, 3, 4, 5 and 6). Watts billed Scully \$1400 and requested payment on 11/8/22, 1/20/23 and 1/31/23 per the attached email exhibits.

Scully did not report any payments to Watt/Campaign Research and Strategy other than a 3/27/23 payment for \$500 (see Exhibit 6A) for "phone banking".

Scully did not report the full cost of Watts services on any of the 10 reports he submitted covering the period including 11/3/22 and subsequent dates for the Robo Calls and mass text messages. This includes reports submitted for:

Quarter 4, 2022
Quarter 1, 2023
Quarter 2, 2023
Quarter 3, 2023
Quarter 4, 2023
Quarter 1, 2024
Quarter 2, 2024
Quarter 3, 2024
Quarter 4, 2024
Quarter 1, 2025

While it may be possible that Watts ultimately wrote-off the remainder of the billing ($\$1,400 - \$500 = \$900$) or that someone else paid the remainder of the invoice on behalf of Mr. Scully, Scully did not report any in-kind contributions from Watts or anyone else for the \$900 of services provided.

2) Tige Watts/Campaign Research and Strategy admitted in a deposition (Exhibit 7, page 7) that he provided campaign services to Scully in 2022. In addition, email records show that he regularly provided the following campaign services directly individually to Mr. Scully:

Maps of the school district (Exhibit 8 – 8/15/22)

Information on Scully's opponent (Exhibit 9 – 8/15/22 and Exhibit 10 – 9/20/22)

Assistance preparing Scully's bio (Exhibit 11 – 8/17/22)

Assistance preparing a fund-raising letter for Scully (Exhibit 12 – 8/25/22)

Pricing for signs (Exhibit 13 – 9/1/22)

Invoicing for signs (Exhibit 14 – 9/2/22)

Voter Turnout reports (Exhibit 15 – 10/17/22)

Logo for signs (Exhibit 16 – 10/18/22)

In one email (Exhibit 6) Watts states that he had the login information for Scully's Stripe account.

These services began by August 15, 2022. However, Scully did not report any payments to Watts or any in-kind contributions for free services from Watts on any of the 12 reports he submitted covering the period including 8/15/22 and subsequent reports. This includes reports submitted for:

Initial Report

Quarter 3, 2022/pre-election report

Quarter 4, 2022

Quarter 1, 2023

Quarter 2, 2023

Quarter 3, 2023

Quarter 4, 2023

Quarter 1, 2024

Quarter 2, 2024

Quarter 3, 2024

Quarter 4, 2024

Quarter 1, 2025

- 3) There are several emails between Mr. Scully and three other candidates (Herring, Satterfield and Snipes) and Watts that indicate Watts was also working for all four candidates as a group:

Analysis of 2020 Election (Exhibit 17 – 8/24/22)
Suggested Sign Locations (Exhibit 18 – 8/25/22)
Information on district schools (Exhibit 19 – 8/27/22)
How to participate in local parades (Exhibit 20 – 9/2/22)
A meeting to prepare for a candidate forum (Exhibit 21 – 10/3/22)

Herring, Satterfield and Snipes all reported campaign expenses for Watt's services:

Herring (Exhibit 22 - \$7,925 paid on 11/14/22)
Satterfield (Exhibit - 23 - \$6,000 paid on 10/11/22 and 11/17/22)
Snipes (Exhibit 24 - \$5,200 for mailers paid on 10/19/22) – note that Snipes reported \$3,600 to Tori West for campaign management)

Scully received as much or more documented campaign management services from Watts, yet reported no expenses paid to Watt or Campaign Research and Strategies other than a partial payment of \$500 (1 above) for Robo calling and texting.

Logically, Scully's services from Watts should have been somewhere around the \$6,000 - \$7,925 that Herring and Satterfield paid Watts – if not more, given the extra services we know that Scully received from Watts.

These services began by August 24, 2022. However, Scully did not report any payments to Watts or any in-kind contributions for free services from Watts on any of the 11 reports he submitted covering the period including 8/15/22 and subsequent reports. This includes reports submitted for:

Quarter 3, 2022/pre-election report
Quarter 4, 2022
Quarter 1, 2023
Quarter 2, 2023
Quarter 3, 2023
Quarter 4, 2023
Quarter 1, 2024
Quarter 2, 2024

Quarter 3, 2024
Quarter 4, 2024
Quarter 1, 2025

Someone paid for these services, which makes them an in-kind contribution. Not only were these expenses not reported as an in-kind contribution, at a value of over \$6,000 this contribution would violate the maximum \$1,000 campaign contribution limit.

- 4) Upon information and belief Scully was also promoted on the mailer for which Snipes paid Tige Watts \$5,200. Scully did not report this expense or any expense for mailers.

Either Snipes paid for the entire mailer, even though it was equally for Scully, or Scully failed to report the expense or it was an in-kind contribution that was not reported. Assuming his portion was also \$5,200, this amount exceeds the contribution limit of \$1,000.

It appears that Scully received services of over \$12,100 that he did not pay for or report:

Robocalls and Texts:	\$ 900
Campaign Management Services:	\$6,000 (minimum)
Mailer:	\$5,200
TOTAL	\$12,100

In addition to the potential ethics violations above, it would appear the Ethics Commission needs to investigate who paid these expenses on behalf of Mr. Scully and why as there well could be other ethics violations.

Exhibit 1

Scripts for Robocall and Texting campaign

From: Tige Watts - CR+S (campaignrs@aol.com)

To: kscully73@gmail.com

Date: Thursday, November 3, 2022 at 12:28 PM EDT

Attached you should find two word files. One is the script for the robocall and the other is for the texting campaign. Please review and shoot me back your changes and edits to the texting campaign script. For the autocal script, I need you to make whatever changes you see fit and record that with the Voice Memos app on your iPhone. Then I need you to text that voice file to me at my cell number. If you can shoot me the changes to texting campaign script first, that would be ideal because that's the most pressing item of the two right now. Don't hesitate to call me if you have any questions or need more info. Thanks and talk with you later!

Tige Watts,
Campaign Research & Strategy, Inc.
1214 Henderson Street
Columbia, SC 29201
Office: (803) 929-0922
Fax: (803) 851-4886
Cell: (803) 237-3396
Web: www.campaigns411.com



Scully-AutoCall Script.docx
12.5kB



Scully-Outbound Text Script.docx
12.1kB

Exhibit 2

Re: Scripts for Robocall and Texting campaign

From: campaignrs (null) (campaignrs@aol.com)

To: kscully73@gmail.com

Date: Friday, November 4, 2022 at 07:35 AM EDT

Also, were you able to record the message for the robocall? I need that no later than this weekend please.

Thanks,
Tige

Sent from my iPhone

On Nov 4, 2022, at 7:33 AM, campaignrs (null) <campaignrs@aol.com> wrote:

I'm a little concerned that first sentence of the second paragraph might work against us. What if we changed it to something with a positive foundation like this...

"On the school board. Kevin will bring a renewed focus on supporting students, teachers, and families to heal divisions and promote unity in District Five. Can we count on you to VOTE for KEVIN SCULLY to restore trust and educational excellence in our schools?"

Divisive voices are fraying our school district. But with renewed focus on supporting our students, teachers and families, we can unite our district again. Can we count on your support to elect KEVIN SCULLY to restore trust and excellence to the School Board?
Reply STOP to opt out.

Sent from my iPhone

Thanking you in advance,
Nigel Mahaffey
803-348-4250

"Life is a banquet and most poor suckers are starving to death"

On Nov 3, 2022, at 8:32 PM, Kevin Scully <kscully73@gmail.com> wrote:

What do you think of this for the text?

HI (NAME). This is Lucy on behalf of KEVIN SCULLY's campaign for the District Five School Board. We just wanted to remind you tomorrow is Election Day and voting precincts are open from 7 a.m. to 7 p.m. You can vote for two people in the election for School Board, and Kevin is asking for just one of those votes.

On Thu, Nov 3, 2022 at 12:28 PM Tige Watts - CR+S <campaignrs@aol.com> wrote:

Attached you should find two word files. One is the script for the robocall and the other is for the texting campaign. Please review and shoot me back your changes and edits to the texting campaign script. For the autocall script, I need you to make whatever changes you see fit and record that with the Voice Memos app on your iPhone. Then I need you to text that voice file to me at my cell number. If you can shoot me the changes to texting campaign script first, that would be ideal because that's the most pressing item of the two right now. Don't hesitate to call me if you have any questions or need more info. Thanks and talk with you later!

KBL 001805

Exhibit 3

Robo call

From: Kevin Scully (kscully73@gmail.com)

To: campaigns@aol.com

Date: Saturday, November 5, 2022 at 02:01 AM EDT

If this is horrible, let me know. It took so many....so many takes to get.

But, if it is still not up to snuff, let me know and I'll keep trying.



Kevin Robocall.m4a
1011.8kB

Exhibit 4

Re: Robo call

From: campaignrs (null) (campaignrs@aol.com)

To: kscully73@gmail.com


Date: Saturday, November 5, 2022 at 11:13 AM EDT

This recording is damn near perfect Kevin! Very good job, and there's really no editing I need to do it outside of amplification.

Thanks,
Tige

Sent from my iPhone

- > On Nov 5, 2022, at 2:01 AM, Kevin Scully <kscully73@gmail.com> wrote:
- >
- >
- > If this is horrible, let me know. It took so many....so many takes to get.
- >
- > But, if it is still not up to snuff, let me know and I'll keep trying.

 Kevin Robocall.m4a
1011.8kB

KBL 001803

Exhibit 5

Invoice for robocalling and text-banking

From: Tige Watts - CR+S (campaignrs@aol.com)

To: kscully73@gmail.com

Date: Tuesday, November 8, 2022 at 11:13 AM EST

Kevin -

Attached to this email you should find the invoice for the robocalls and text banking for your campaign. Best of luck today and I'll see you later this evening. Many thanks in advance and talk with you later!

Tige Watts,
Campaign Research & Strategy, Inc.
1214 Henderson Street
Columbia, SC 29201
Office: (803) 929-0922
Fax: (803) 851-4886
Cell: (803) 237-3396
Web: www.campaigns411.com



KevinScully-2022 Campaign Services Invoice.pdf
97.7kB

Exhibit 6

Re: Invoice for robocalling and text-banking

From: Tige Watts - CR+S (campaignrs@aol.com)

To: kscully73@gmail.com

Date: Tuesday, January 31, 2023 at 12:25 PM EST

Hey Kevin!

Sorry for the delay responding back to you. I was tied up since Thursday with various civic projects and a weekend business trip to North Carolina. However, I am catching back up on email since coming back home early Monday.

Since this amount is actually a reimbursement (the \$1400 is what I paid out of pocket to my vendor), I don't have any flexibility with the amount I'm charging. I think the best thing is to issue a \$500 payment immediately, and then issue payments of \$100 over the next 9 month.

I never had login information when it comes to your bank account, like I did for the account you have with Stripe. However, I can accept electronic payments or wire transfers. If you bank with Bank of America, that's the easiest way. If you bank with another bank, I can shoot you the information (routing and account number) I can also accept payments via PayPal if you have that ability. Give me a call at your convenience (803-237-3396) so we can figure out the best way to get that initial payment of \$500 in motion. Many thanks again and looking forward to talking with you today or tomorrow.

Tige Watts,
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Columbia, SC 29201
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Cell: (803) 237-3396
Web: www.campaigns411.com

-----Original Message-----

From: Kevin Scully <kscully73@gmail.com>
To: Tige Watts - CR+S <campaignrs@aol.com>
Sent: Thu, Jan 26, 2023 2:13 pm
Subject: Re: Invoice for robocalling and text-banking

Thanks Tige.

I hope you're doing well. I have \$538 remaining in my campaign account. I can pay that to you now, but I'll have to make payments on the balance as I don't have the cash anywhere else to pull it from. How can I get the payment to you? Do you still have my account information to pull the funds?

Kevin

On Fri, Jan 20, 2023 at 1:28 PM Tige Watts - CR+S <campaignrs@aol.com> wrote:
Hey Kevin!

Hope things are going well for you and all is well. Just doing some bookkeeping on my end and wanted to bring this invoice back up for your attention. This one has not yet been paid and was for the texting and robocalling the last few days of the campaign. Please submit payment at your first opportunity. If you have any questions or need additional information, please don't hesitate to call me on my cell. Many thanks again and hope 2023 is treating you well so far. Talk with you later!

Tige Watts,

KRT. 001776



Campaign Research + Strategy, Inc.

1214 Henderson Street
Columbia, SC 29201
Telephone: 803-929-0922
Fax: 803-929-0622

Invoice Number: KS221108
Invoice Date: November 8, 2022
Terms: Due on receipt

Kevin Scully
Scully for District Five School Board



678.787.1414

Via: Email

Re: Scully for School Board – Campaign Services

Services Rendered:

Automated calling services to registered and likely voting targets in Richland County School District Five for School Board candidate Kevin Scully. 16,230 individuals with 9100 unique phone numbers in universe. Includes all phone line charges, data services, program administration, etc. \$700.00

Peer 2 Peer text banking to registered and likely voting targets in Richland County School District Five for School Board candidate Kevin Scully. 3624 individuals with 2800 unique cell numbers in universe. Includes all phone line charges, data services, program administration, personnel, etc. \$700.00

Sub-Total: \$1,400.00

Amount Paid: \$0.00

Grand Total Due: \$1,400.00

SC Ethics Public Reporting (/public)

Exhibit 6A

Candidates & Public Officials (/public/candidates-public-officials)

Menu

Campaign Reports (/public/campaign-reports)

Statements of Economic Interests (/public/statement-economic-interests)

< [Kevin M. Scully \(/public/candidates-public-officials/person/profile?personId=46330&seid=54226\)](/public/candidates-public-officials/person/profile?personId=46330&seid=54226)

Lexington/Richland #5 School Board

[Reports \(/public/candidates-public-officials/person/campaign-disclosure-reports/reports?personId=46330&seid=54226&officeld=72088\)](/public/candidates-public-officials/person/campaign-disclosure-reports/reports?personId=46330&seid=54226&officeld=72088)

[Finances \(/public/candidates-public-officials/person/campaign-disclosure-reports/finances?personId=46330&candidateFilerId=46330&campaignId=72088&seid=54226&officeld=72088\)](/public/candidates-public-officials/person/campaign-disclosure-reports/finances?personId=46330&candidateFilerId=46330&campaignId=72088&seid=54226&officeld=72088)

[Contributors \(/public/candidates-public-officials/person/campaign-disclosure-reports/contributors?personId=46330&candidateFilerId=46330&campaignId=72088&seid=54226&officeld=72088\)](/public/candidates-public-officials/person/campaign-disclosure-reports/contributors?personId=46330&candidateFilerId=46330&campaignId=72088&seid=54226&officeld=72088)

[Vendors \(/public/candidates-public-officials/person/campaign-disclosure-reports/vendors?personId=46330&seid=54226&officeld=72088\)](/public/candidates-public-officials/person/campaign-disclosure-reports/vendors?personId=46330&seid=54226&officeld=72088)

Quarter 1, 2023 Report

Filing Period: 1/1/2023 - 3/31/2023

 [Create PDF](#)

Election Date: Nov 8, 2022

Election Type: General

Expenditure Total: \$568.46

Date	Paid To	Amount	Mailing Address	Description
Mar 31, 2023	Wells Fargo Bank	\$10.00	331 Harbison Blvd Columbia, SC 29212	Service fee
Mar 27, 2023	Campaign Research & Strategy, Inc.	\$500.00	1214 Henderson Street Columbia, SC 29201	Phone Banking
Jan 31, 2023	Wells Fargo Bank	\$10.00	331 Harbison Blvd Columbia, SC 29212	Monthly service fee



3200 Devine Street, Suite 103
Columbia, South Carolina 29205
info@garberreporting.com
Telephone: (803) 256-4500

TIGE WATTS

August 12, 2024

Kenneth B. Loveless

VS

Kevin Scully

2022-CP-40-01307

REPORTER: Cassandra Vance

1 TIGE WATTS, having been duly sworn,
2 deposes and testifies as follows:

3 EXAMINATION

4 BY MS. BALLARD:

5 Q I'm Desa Ballard. We met a few minutes ago,
6 Mr. Watts. Thank you for coming.

7 Under the rules, I'm required to tell you
8 that if you don't understand my question, which is
9 entirely possible because I don't --

10 A Uh-huh (affirmative response).

11 Q -- write out my questions in advance -- I
12 don't write a script -- please ask me to repeat
13 it. We just want to make sure that we are
14 understanding each other.

15 A Sure.

16 Q We need you to provide audible answers, "yes"
17 or "no," as opposed to "uh-huh" or "huh-uh." And
18 as Nellie said, we all default to that, so don't
19 be --

20 A Right.

21 Q -- embarrassed if you do. I'm pretty good at
22 saying, "Say 'yes' for the court reporter," or,
23 "Say 'no' for the court reporter," so I'll try to
24 help you as much as I can. I don't think we'll be
25 here all that long. And you're represented by

1 through personnel agencies or our own staffing,
2 you know, part-time individuals throughout the
3 year.

4 **Q And then your clients, of course, have**
5 **their -- their helpers, their staffs that help**
6 **them. I assume you work with staffs?**

7 A Yeah. Well, not necessarily staff.
8 Sometimes staffs, but also some volunteers
9 associated with those campaigns.

10 **Q Okay. That's great. Thank you.**

11 A Uh-huh (affirmative response).

12 MS. BALLARD: I didn't have an extra
13 copy of the subpoena to give to you, Seth,
14 but I apologize.

15 MR. ROSE: Oh, you're fine.

16 BY MS. BALLARD:

17 **Q Can you, off the top of your head, tell me**
18 **when Ed White -- or, excuse me, when Kevin Scully**
19 **was a client of yours?**

20 A Kevin Scully was not a client of mine
21 until -- I'm trying to remember the year -- until
22 the year 2022.

23 **Q Okay.**

24 A That's when -- it was prior to his filing for
25 School District -- School District 5 in Richland

1 BY MS. BALLARD:

2 Q This is a printout from the State Ethics
3 Commission's Contributions to Candidates.

4 A Uh-huh (affirmative response).

5 Q And I noticed that you're listed as a
6 contributor to Mr. Scully --

7 A Uh-huh (affirmative response).

8 Q -- during his October -- excuse me, his
9 August 2022 campaign.

10 A Uh-huh (affirmative response).

11 Q Is it unusual for you to make a campaign
12 contribution to your own clients?

13 A Not unusual. In fact, in this case, I can
14 pretty much tell you that it was probably when I
15 was setting up his website for -- with the -- in
16 testing his fundraising, you know, the -- setting
17 up whether or not...

18 A lot of candidates have a way that you can
19 contribute to their campaigns through their
20 websites. I would have probably used that, tested
21 it to make sure it was working, and that's --

22 Q I see.

23 A -- and that's what I was most likely doing
24 here, to the best in my recollection.

25 Q Okay. So was the \$100 contribution that you

1 **made was a personal contribution by you?**

2 A I believe so. It would be the -- depending
3 on the address. Yeah.

4 **Q It's the 1214 address.**

5 A Actually, yeah, yeah, yeah, it was a personal
6 contribution.

7 **Q Okay.**

8 A Yep.

9 **Q How did you meet Kevin Scully?**

10 A I'm not a hundred percent sure exactly when,
11 but it was -- I believe it was after the 2020
12 cycle, probably -- and probably not until the year
13 2022.

14 **Q But how did you meet him?**

15 A You mean by did I meet --

16 **Q Was he introduced to you by someone?**

17 A It's hard to remember, to be honest. I think
18 it seems like he was involved with a Facebook
19 group, possibly, but I can't remember for sure.

20 And I'm not sure if it was somebody else who
21 introduced me or if he approached me individually.
22 I wish I could provide more clarity but I'm not a
23 hundred percent certain exactly how we first met.

24 **Q Okay.**

25 A But I know it was sometime after 2020.

Exhibit 8

my email

From: Tige Watts - CR+S (campaignrs@aol.com)

To: kscully73@gmail.com

Date: Monday, August 15, 2022 at 12:19 PM EDT

CampaignRS@aol.com

<https://rfa.sc.gov/mapping>

Tige Watts,
Campaign Research & Strategy, Inc.
1214 Henderson Street
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Cell: (803) 237-3396
Web: www.campaigns411.com

Exhibit 9

Tifani Moore SIC form

From: Tige Watts - CR+S (campaignrs@aol.com)

To: kscully73@gmail.com

Date: Monday, August 15, 2022 at 12:52 PM EDT

attached

Tige Watts,
Campaign Research & Strategy, Inc.
1214 Henderson Street
Columbia, SC 29201
Office: (803) 929-0922
Fax: (803) 851-4886
Cell: (803) 237-3396
Web: www.campaigns411.com



TifaniMoore.pdf
40.2kB

From: Kevin
To: Taylor Smith; Rhonda Schaub; Drew Radeker
Subject: Fwd: Sloop's comments and lies from Tifani
Date: Sunday, November 3, 2024 1:17:20 AM
Attachments: [IMG_0085.PNG](#)
[IMG_0086.PNG](#)
[IMG_0087.PNG](#)
[IMG_0088.PNG](#)
[IMG_0089.PNG](#)
[IMG_0090.PNG](#)
[IMG_0091.PNG](#)
[IMG_0092.PNG](#)
[IMG_0093.PNG](#)
[IMG_0094.PNG](#)
[IMG_0095.PNG](#)

Begin forwarded message:

From: Beth Hutchison <beth.hutchisonsc@gmail.com>
Date: September 20, 2022 at 3:06:09 PM EDT
To: Kevin Scully <kscully73@gmail.com>, Tige Watts <campaignrs@aol.com>
Subject: Fwd: Sloop's comments and lies from Tifani

Tige,

I am sending you several screen shots from Irmo Citizens page where both Kevin and I are mentioned regarding Tifani's decision to run. Brian Sloop is pushing this lie and I wondered what your advice is regarding a response.

Of course I never told Tifani she had to call me about running or whatever it is that Brian claims.

At the meeting last night, I am told that Tifani made the second to every motion that Huddle/Ken made, including to send the results of the "audit" to the AG.

Your thoughts?

Beth

----- Forwarded message -----

Date: Tue, Sep 20, 2022 at 1:15 PM
Subject: Sloop's comments and lies from Tifani
To: Beth Hutchison <beth.hutchisonSC@gmail.com>

>
>
>

Exhibit 11

Bio

From: Kevin Scully (kscully73@gmail.com)

To: campaignrs@aol.com

Date: Wednesday, August 17, 2022 at 10:06 PM EDT

Tige,

Here's what I've drafted for my bio. I think I have some good nuggets in there, but you're the expert, so let me know what you think.

My name is Kevin Scully and I'm running for the District 5 School Board in Richland County.

At home, I am the proud husband of a teacher and parent of a current D5 student and four recent D5 graduates. Our children have attended River Springs, Dutch Fork Middle, Dutch Fork High and Spring Hill High. I have served four years on two SIC committees, and closely follow the issues in education, and especially in our district.

I am a graduate of Irmo High School and work for the USDA, Rural Development. My wife, Calli, in addition to being a teacher in the district, grew up in D5. She attended Leaphart Elementary, Irmo Middle (Campus R) and graduated from Irmo High.

When Calli and I were in school, D5 was the best in the state. It was a destination where families sought to live just so their children could attend our schools. We are products of this district and have chosen to raise our family here because of the educational excellence D5 provides.

But lately, we've seen our neighboring school districts become the destinations that we used to be. We are losing our best teachers and resources to other districts at an alarming rate. As a long-time product of this district, I am dismayed by these trends.

Like many of you, I am also concerned that the priorities of our current board members are not aligned with our needs. We cannot focus on the challenges of tomorrow when we're still fighting the battles of yesterday.

To our teachers, my message is simple: I see and hear you. I see your love for your students and profession; I see how you sacrifice your own time and resources so that you can better serve our students; I see you pray for students when they struggle and give thanks when they achieve; I see you continuing to show up for our children day after day while being asked to do more and more with fewer resources. You are the superheroes of our district, but even superheroes need support, resources and a safe environment in which to work. I hear your calls for that support.

The D5 motto is "We Love and Grow Our Students." But that's not enough. We must "Love and Grow Our Teachers" too.

The reason I am running for the board is to return our district to a destination of educational excellence that my family experienced. In order to do this, we must secure the resources

KBL 001691

needed to attract and retain the highest quality educators and provide safe and secure learning and teaching environments in our schools. But funding for public education is scarce and the competition is fierce. We must eat or be eaten. If D5 doesn't get the funds, other districts will.

My goal as a board member is to restore the trust in our board and heal the division in our district. Additionally, we must maximize our resources through innovation, public private partnerships and increased advocacy to prepare our district to meet the challenges of the future.

The color of my logo reminds us that brighter days are ahead in D5. Please consider voting for **Kevin Scully** as your next school board member in Richland County. Together, we can return to excellence.

Thank you!

Re: fundraising letter

Exhibit 12

From: Tige Watts - CR+S (campaignrs@aol.com)

To: kscully73@gmail.com

Date: Thursday, August 25, 2022 at 05:27 PM EDT

There were some things that were missing so I ended up making some major overhauls to the letter. I saved it under a slightly different filename, but take a read over it and make sure I didn't leave anything important out. Thanks!

Tige Watts,
Campaign Research & Strategy, Inc.
1214 Henderson Street
Columbia, SC 29201
Office: (803) 929-0922
Fax: (803) 851-4886
Cell: (803) 237-3396
Web: www.campaigns411.com

-----Original Message-----

From: Kevin Scully <kscully73@gmail.com>
To: Tige Watts - CR+S <campaignrs@aol.com>
Sent: Thu, Aug 25, 2022 3:10 pm
Subject: fundraising letter

Tige,

See attached. Would you make any changes, or is this suitable to go out?



Scully fundraising letter-TAW edits.docx
275.7kB

Exhibit 13

Re: Pricing on yard signs and other signage

From: Tige Watts - CR+S (campaignrs@aol.com)

To: kscully73@gmail.com

Date: Thursday, September 1, 2022 at 09:37 AM EDT

OK I just finished talking with them. Give me a call and I'll give you the status on your yard sign order as well as the other request you sent last night. I promise it's good news, LOL, but call me on my at your first opportunity. Thanks!

Tige Watts,
Campaign Research & Strategy, Inc.
1214 Henderson Street
Columbia, SC 29201
Office: (803) 929-0922
Fax: (803) 851-4886
Cell: (803) 237-3396
Web: www.campaigns411.com

-----Original Message-----

From: Tige Watts - CR+S <campaignrs@aol.com>
To: kscully73@gmail.com <kscully73@gmail.com>
Sent: Thu, Sep 1, 2022 9:29 am
Subject: Re: Pricing on yard signs and other signage

I'll check with Velvetex in a few minutes, but I'm almost sure they won't be able to do it. However, there is a chance they may be able to do it, but it could cost a small fortune. I'll also ask about 24 x 48 size as well since that's more likely to be done in such a short turn-around, since it's a fourth of the size and can still be seen really well. Let you know what I find out as soon as I finish talking with them.

Tige Watts,
Campaign Research & Strategy, Inc.
1214 Henderson Street
Columbia, SC 29201
Office: (803) 929-0922
Fax: (803) 851-4886
Cell: (803) 237-3396
Web: www.campaigns411.com

-----Original Message-----

From: Kevin Scully <kscully73@gmail.com>
To: Tige Watts - CR+S <campaignrs@aol.com>
Sent: Thu, Sep 1, 2022 12:34 am
Subject: Re: Pricing on yard signs and other signage

Any chance they could make 1 or 2 of the 48 x 96 signs in time for the parade on monday? I can't find anyone to walk in the parade with me, so it is literally going to be me and 3 kids walking in front of a pick up truck. I need to at least have my name in huge letters on the truck.

On Mon, Aug 29, 2022 at 12:27 PM Tige Watts - CR+S <campaignrs@aol.com> wrote:
Hey Kevin -

Finally got some pricing back from Velvetex on yard signs. For the 12 x 24 size signs that you would use to put

KBL 001791

in front of homes and along right of ways, we're looking at a base price of 3.00 per sign and 1.10 for the stands. The numbers work out to be like this....

500 quantity - 12 x 24 - \$3.00 each = \$1500
500 quantity - step stakes - \$1.10 each = \$550
Sales Tax Estimate 8 percent = \$164
TOTAL FOR ITEMS ABOVE = \$2214.00

I also got price estimates for bigger size signs (24 x 48, and 48 x 96) at quantity units of 25 and 50, along with whether they are printed one-sided and two-sided. These signs are definitely for your major roadways that people will see in their normal commutes.

For the 24 x 48 size, if we just print them on one side a quantity of 50 would cost \$950 (\$19 per). Add 8 percent sales tax and the cost comes to \$1026.

For the 24 x 48 size, if they are printed on both sides a quantity of 50 costs \$1350 (\$27 per). 8 percent sales tax added brings the cost to \$1408.

For the 48 x 96 size, if we just print them on one side a quantity of 25 would cost \$1200 (\$48 per). Add 8 percent sales tax and the cost comes to \$1296.

For the 48 x 96 size, if they are printed on both sides a quantity of 50 would cost \$1850 (\$74 per). Add 8 percent sales tax and the cost comes to \$1998.

Call me with any questions of if you need additional information. Many thanks in advance and talk with you later!

Tige Watts,
Campaign Research & Strategy, Inc.
1214 Henderson Street
Columbia, SC 29201
Office: (803) 929-0922
Fax: (803) 851-4886
Cell: (803) 237-3396
Web: www.campaigns411.com

Exhibit 14

Signs are ready

From: campaignrs (null) (campaignrs@aol.com)

To: kscully73@gmail.com

Date: Friday, September 2, 2022 at 09:57 AM EDT

Take this invoice with a check made out to Velvetex. They are located at 1144 Shop Road (near stadium) Columbia SC 29201. Call them at 803-799-6262 to check when they close since today is Labor Day Friday!

blob:https://connect.intuit.com/2c486f00-60b4-4108-8934-b717a8ab38e2

Sent from my iPhone

Thanking you in advance,

Nigel Mahaffey

803-348-4250

"Life is a banquet and most poor suckers are starving to death"



Unknown.pdf

14.6kB

KBL 001814

LR5 Turnout by Precinct

Exhibit 15

From: Tige Watts - CR+S (campaignrs@aol.com)

To: kscully73@gmail.com

Date: Monday, October 17, 2022 at 10:17 AM EDT

Richland county precincts are on PAGE 2 of this pdf

Tige Watts,
Campaign Research & Strategy, Inc.
1214 Henderson Street
Columbia, SC 29201
Office: (803) 929-0922
Fax: (803) 851-4886
Cell: (803) 237-3396
Web: www.campaigns411.com



2022-LR5 Voter Registration Turnout Matrix by County.pdf
270.2kB

Exhibit 16

logo

From: Tige Watts - CR+S (campaignrs@aol.com)

To: kscully73@gmail.com

Date: Tuesday, October 18, 2022 at 01:55 PM EDT

attached

Tige Watts,
Campaign Research & Strategy, Inc.
1214 Henderson Street
Columbia, SC 29201
Office: (803) 929-0922
Fax: (803) 851-4886
Cell: (803) 237-3396
Web: www.campaigns411.com



Scully-Final Logo Signs.png
131.6kB

Rhonda Schaub

From: Kevin <kscully73@gmail.com>
Sent: Sunday, November 3, 2024 1:11 AM
To: Taylor Smith; Rhonda Schaub; Drew Radeker
Subject: Fwd: Analysis of the 2020 school board campaign
Attachments: Analysis of 2020 School Board election..docx

Begin forwarded message:

From: Beth Hutchison <beth.hutchisonsc@gmail.com>
Date: August 24, 2022 at 2:54:24 PM EDT
To: Kimberly Snipes <campaign@snipesforschoolboard.com>, Kevin Scully <kscully73@gmail.com>, Scott Herring <fishdrummerusc1@gmail.com>, Mike Satterfield <mksatterfield1@yahoo.com>, Sunny Herring <Sunnyherring@hotmail.com>, Kathryn Satterfield <kathrynsatterfield@yahoo.com>, Dominique Snipes <dssnipes9@gmail.com>
Cc: Beth Hutchison <beth.hutchisonsc@gmail.com>, Tige Watts <campaignrs@aol.com>
Subject: Analysis of the 2020 school board campaign

Friends,

Please see the attached analysis of the 2020 school board election. As I re-read it this morning, it occurred to me that each of you might like to get a better understanding of what happened in that election and how Huddle, Hogan, and Hines won their board seats.

I think this analysis also shows how the campaign strategy Tige has laid out for us is a winning strategy:

- *raising a lot of money to finance your campaign,
- *buying a large number of campaign signs,
- *creating name recognition through flyers, effective websites, facebook and more, and
- *staffing every polling location with dependable volunteers on election day.

I know you are all trying to raise money for the campaign. As Tige explained the other day, you aren't raising money for yourself or your family. You are raising money to help the students and families in D5. You need campaign money to let voters know who the best candidates are to move this school district in a positive direction to support academic excellence.

Thank you for offering to run for the school board,

Beth

Beth Hutchison
beth.hutchisonSC@gmail.com
803-261-7123

Analysis of the 2020 school board campaign

From: Beth Hutchison (beth.hutchisonSC@gmail.com)

To: campaign@snipesforschoolboard.com; kscully73@gmail.com; fishdrummerusc1@gmail.com; mksatterfield1@yahoo.com; Sunnyherring@hotmail.com; kathrynsatterfield@yahoo.com; dssnipes9@gmail.com

Cc: beth.hutchisonSC@gmail.com; campaignrs@aol.com

Date: Wednesday, August 24, 2022 at 02:54 PM EDT

Friends,

Please see the attached analysis of the 2020 school board election. As I re-read it this morning, it occurred to me that each of you might like to get a better understanding of what happened in that election and how Huddle, Hogan, and Hines won their board seats.

I think this analysis also shows how the campaign strategy Tige has laid out for us is a winning strategy:

*raising a lot of money to finance your campaign,

*buying a large number of campaign signs,

*creating name recognition through flyers, effective websites, facebook and more, and

*staffing every polling location with dependable volunteers on election day.

I know you are all trying to raise money for the campaign. As Tige explained the other day, you aren't raising money for yourself or your family. You are raising money to help the students and families in D5. You need campaign money to let voters know who the best candidates are to move this school district in a positive direction to support academic excellence.

Thank you for offering to run for the school board,

Beth

Beth Hutchison
beth.hutchisonSC@gmail.com
803-261-7123



Analysis of 2020 School Board election..docx
16.7kB

Exhibit 18

Ideas for campaign sign locations

From: Beth Hutchison (beth.hutchisonsc@gmail.com)

To: campaign@snipesforschoolboard.com; kscully73@gmail.com; dssnipes9@gmail.com;
Talkingprincess05@yahoo.com

Cc: campaignrs@aol.com; beth.hutchisonsc@gmail.com

Date: Thursday, August 25, 2022 at 12:41 PM EDT

Friends,

Attached is a list of campaign locations candidates for D5 school board from Richland County have used in the past. Calli already contacted a homeowner at Kennerly and Eleazer and got permission to put both candidate's signs there.

This list is not focused on the friends and supporters you will ask about putting a campaign sign in their yards.

I dated this document since we hopefully can add more locations an update the document.

Call if you have questions,

Beth

Beth Hutchison

beth.hutchisonSC@gmail.com



Richland County sign locations. 8.25.2022.docx
16.2kB

KBL 001728

Re: List of D5 schools, location by county, and more

From: Kevin Scully (kscully73@gmail.com)

To: beth.hutchisonsc@gmail.com

Cc: fishdrummerusc1@gmail.com; Sunnyherring@hotmail.com; mksatterfield1@yahoo.com; kathrynsatterfield@yahoo.com; campaign@snipesforschoolboard.com; dssnipes9@gmail.com; Talkingprincess05@yahoo.com; campaignrs@aol.com

Date: Saturday, August 27, 2022 at 12:18 PM EDT

Thank you, Beth!! This is extremely helpful.
-Kevin

On Sat, Aug 27, 2022 at 7:17 AM Beth Hutchison <beth.hutchisonsc@gmail.com> wrote:

Friends

I was asked where schools are located by county. So, I created the attached word document and added the county in which most of that school's students live. Since the county line weaves throughout the middle of the district, there are pockets of neighborhoods that are in one county but are zoned for a school that is in the other county. In those cases, I listed the primary county served.

We have several schools that are magnet schools and some schools which have magnet programs within the school, thus the students served can be residents of either Lexington or Richland Counties.

Link to the list of D5 schools and addresses: [Schools / Home \(lexrich5.org\)](https://www.lexrich5.org/Schools/Home)

Link to magnet school information: [Office of Academics & Administration / Schools \(lexrich5.org\)](https://www.lexrich5.org/Office%20of%20Academics%20&%20Administration/Schools)

Link describing Title One schools criteria: [About Our School / Title One School \(lexrich5.org\)](https://www.lexrich5.org/About%20Our%20School/Title%20One%20School)

Title One Schools: Seven Oaks Elem., Leaphart Elem. Harbison West Elem., Nursery Road Elem., H.E. Corley Elem.

I hope the attached document helps clarify which schools serve the voters in your county.

As always, please call me if you have questions.

Beth

Beth Hutchison
beth.hutchisonSC@gmail.com
803-261-7123

Exhibit 20

Re: Chapin Labor Day Parade

From: Sunny Herring (sunnyherring@hotmail.com)

To: campaigns@aol.com

Cc: beth.hutchisonsc@gmail.com; kscully73@gmail.com; Talkingprincess05@yahoo.com; campaign@snipesforschoolboard.com; dssnipes9@gmail.com; mksatterfield1@yahoo.com; kathrynsatterfield@yahoo.com; fishdrummerusc1@gmail.com

Date: Friday, September 2, 2022 at 09:44 PM EDT

Thank you, Beth and Tige, for your continued support, consultation, and guidance. We would definitely be lost without both of you!

Happy to serve and support!
Sunny

On Sep 2, 2022, at 1:58 PM, Tige Watts - CR+S <campaigns@aol.com> wrote:

ONE MORE THING for the Chapin Labor Day Parade... And this is for ALL members of the Fabulous Four....

Please try to make sure someone will take some pictures of your team and in-action walking shots from the parade that can be highlighted on your campaign facebook pages after the event concludes. This is a really easy thing to overlook. And, if y'all are going to as much trouble as y'all are to make a strong showing, then it needs to be documented and Facebook would be our best vehicle for that.

OK, that's it from me... for now... If anyone needs to reach me for the rest of today or this weekend, try me on my cell. I'm going to try to leave my office early today, but my boss is a real jerk (Yes, I work for myself). Talk with everyone later!

Tige Watts,
Campaign Research & Strategy, Inc.
1214 Henderson Street
Columbia, SC 29201
Office: (803) 929-0922
Fax: (803) 851-4886
Cell: (803) 237-3396
Web: www.campaigns411.com

-----Original Message-----

From: Beth Hutchison <beth.hutchisonsc@gmail.com>
To: Kevin Scully <kscully73@gmail.com>; Calli Scully <Talkingprincess05@yahoo.com>; Kimberly Snipes <campaign@snipesforschoolboard.com>; Dominique Snipes <dssnipes9@gmail.com>; Mike Satterfield <mksatterfield1@yahoo.com>; Kathryn Satterfield <kathrynsatterfield@yahoo.com>; Scott Herring <fishdrummerusc1@gmail.com>; Sunny Herring <Sunnyherring@hotmail.com>; Tige Watts <campaigns@aol.com>
Cc: Beth Hutchison <beth.hutchisonsc@gmail.com>
Sent: Thu, Sep 1, 2022 7:58 am
Subject: Chapin Labor Day Parade

All,
The Chapin Labor Day parade is your first public introduction as school board candidates. I hope all of you can be together in the lineup. I know Mike and Scott are riding at the front behind the

KBL 001752

Governor. We need to get Kevin and Kimberly together. I think a phone call or personal visit to Town Hall may help. Mike, can you help make that happen for Kevin and Kimberly? Ideally, we need to have the Kevin/Kimberly together up front with the Mike/Scott team.

Loveless and Gardner are together in the parade. I see that as great news since Loveless is known by so many as a candidate that needs to be voted out. Gardner's negative reputation isn't as widely known. By pairing up, it sends a signal to everyone that she needs to be voted out, too.

It is nice to have multiple volunteers, but don't panic if you just have a few volunteers or none. The Governor and candidates for the House and Senate don't have people walking with them. It is just the candidate and maybe his/her spouse in the car or truck.

The candidate's name and face are the most important part of this parade. Make sure your name is visible in multiple places on the vehicle.

In the past, we have stacked two campaign signs together (such as Scott/Mike) on one board/pole for a few volunteers to carry. If you don't have your campaign signs yet, don't worry. You can plan on doing that in the Irmo Okra Strut parade. Both counties have spoilers in the race, so we need to make sure that people know which two candidates they should vote for.

You don't have to spend money on decorations. But if you want to dress up your vehicle a bit, think about holiday decorations that you can use because they aren't obviously tied to any one holiday. You could use garland with bows on either end and in the middle and place it on the side of your vehicle. Decorating for parades is not a skill of mine.

If it stresses you to think about decorating your vehicle, don't mess with it. There are more important things to focus on in your campaign, such as fundraising. The candidate is the main attraction. Warn the driver to watch for little kids who run into the road to pick up a piece of candy.

I will be out of town from Friday until Monday evening. I hope everything goes smoothly for the parade.

Thank you for running for the school board. It has given lots of people hope that we can flip the board and start focusing on students and their future.

Beth

Invitation: School board candidate forum-Richland County @ Mon Oct 3, 2022 6:30pm - 9pm (EDT) (campaignrs@aol.com)

From: beth.hutchisonsc@gmail.com

To: campaignrs@aol.com; campaign@snipesforschoolboard.com; dssnipes9@gmail.com; kscully73@gmail.com; talkingprincess05@yahoo.com

Date: Wednesday, September 7, 2022 at 06:52 PM EDT

When

Monday Oct 3, 2022 · 6:30pm – 9pm (Eastern Time - New York)

Guests

beth.hutchisonsc@gmail.com - organizer

Kimberly Snipes

Dominique Snipes

Kevin Scully

Calli Scully

Tige Watts

View all guest info

Reply for campaignrs@aol.com


Yes No Maybe More options

Invitation from Google Calendar

You are receiving this email because you are an attendee on the event. To stop receiving future updates for this event, decline this event.

Forwarding this invitation could allow any recipient to send a response to the organizer, be added to the guest list, invite others regardless of their own invitation status, or modify your RSVP. Learn more

 31 invite.ics
2.3kB

 31 Untitled
2.2kB

SC Ethics Public Reporting (/public)

Exhibit 22

Candidates & Public Officials (/public/candidates-public-officials)



Campaign Reports (/public/campaign-reports)

Statements of Economic Interests (/public/statement-economic-interests)

< [David S. Herring \(/public/candidates-public-officials/person/profile?personId=46218&seid=0\)](/public/candidates-public-officials/person/profile?personId=46218&seid=0)

Lexington/Richland #5 School Board

[Reports \(/public/candidates-public-officials/person/campaign-disclosure-reports/reports?personId=46218&seid=0&officeId=72029\)](/public/candidates-public-officials/person/campaign-disclosure-reports/reports?personId=46218&seid=0&officeId=72029)

[Finances \(/public/candidates-public-officials/person/campaign-disclosure-reports/finances?personId=46218&candidateFilerId=46218&campaignId=72029&seid=0&officeId=72029\)](/public/candidates-public-officials/person/campaign-disclosure-reports/finances?personId=46218&candidateFilerId=46218&campaignId=72029&seid=0&officeId=72029)

[Contributors \(/public/candidates-public-officials/person/campaign-disclosure-reports/contributors?personId=46218&candidateFilerId=46218&campaignId=72029&seid=0&officeId=72029\)](/public/candidates-public-officials/person/campaign-disclosure-reports/contributors?personId=46218&candidateFilerId=46218&campaignId=72029&seid=0&officeId=72029)

[Vendors \(/public/candidates-public-officials/person/campaign-disclosure-reports/vendors?personId=46218&seid=0&officeId=72029\)](/public/candidates-public-officials/person/campaign-disclosure-reports/vendors?personId=46218&seid=0&officeId=72029)

Campaign Research & Strategy

Details

Name

Campaign Research & Strategy

Address

1214 Henderson Street
Columbia , SC 29201

Expenditures

Current Election Cycle

\$7,925.00 Spent

All Expenditures

Date ↓	Amount	Description
--------	--------	-------------

[SC Ethics Public Reporting \(/public\)](#)

[Candidates & Public Officials \(/public/candidates-public-officials\)](#)



[Campaign Reports \(/public/campaign-reports\)](#)

[Statements of Economic Interests \(/public/statement-economic-interests\)](#)

< [Michael R. Satterfield \(/public/candidates-public-officials/person/profile?personId=46132&seild=0\)](#)

Lexington/Richland #5 School Board

[Reports \(/public/candidates-public-officials/person/campaign-disclosure-reports/reports?personId=46132&seild=0&officeld=71986\)](#)

[Finances \(/public/candidates-public-officials/person/campaign-disclosure-reports/finances?personId=46132&candidateFilerId=46132&campaignId=71986&seild=0&officeld=71986\)](#)

[Contributors \(/public/candidates-public-officials/person/campaign-disclosure-reports/contributors?personId=46132&candidateFilerId=46132&campaignId=71986&seild=0&officeld=71986\)](#)

[Vendors \(/public/candidates-public-officials/person/campaign-disclosure-reports/vendors?personId=46132&seild=0&officeld=71986\)](#)

Tige Watts

Details

Name

Tige Watts

Address

1528 Blanding St
Columbia, SC 29201

Expenditures

Current Election Cycle

\$6,000.00 Spent

All Expenditures

Date ↓	Amount	Description
11/17/2022	\$4,000.00	consulting

SC Ethics Public Reporting (/public)

Candidates & Public Officials (/public/candidates-public-officials)



Campaign Reports (/public/campaign-reports)

Statements of Economic Interests (/public/statement-economic-interests)

< [Kimberly P. Snipes \(/public/candidates-public-officials/person/profile?personId=45556&seild=0\)](/public/candidates-public-officials/person/profile?personId=45556&seild=0)

Lexington/Richland #5 School Board

[Reports \(/public/candidates-public-officials/person/campaign-disclosure-reports/reports?personId=45556&seild=0&officeld=71576\)](/public/candidates-public-officials/person/campaign-disclosure-reports/reports?personId=45556&seild=0&officeld=71576)

[Finances \(/public/candidates-public-officials/person/campaign-disclosure-reports/finances?personId=45556&candidateFilerId=45556&campaignId=71576&seild=0&officeld=71576\)](/public/candidates-public-officials/person/campaign-disclosure-reports/finances?personId=45556&candidateFilerId=45556&campaignId=71576&seild=0&officeld=71576)

[Contributors \(/public/candidates-public-officials/person/campaign-disclosure-reports/contributors?personId=45556&candidateFilerId=45556&campaignId=71576&seild=0&officeld=71576\)](/public/candidates-public-officials/person/campaign-disclosure-reports/contributors?personId=45556&candidateFilerId=45556&campaignId=71576&seild=0&officeld=71576)

[Vendors \(/public/candidates-public-officials/person/campaign-disclosure-reports/vendors?personId=45556&seild=0&officeld=71576\)](/public/candidates-public-officials/person/campaign-disclosure-reports/vendors?personId=45556&seild=0&officeld=71576)

Campaign Research + Strategy

Details

Name

Campaign Research + Strategy

Address

1214 Henderson Street
Columbia, SC 29201

Expenditures

Current Election Cycle

\$5,200.00 Spent

All Expenditures

Date ↓

Amount

Description

Please consider the following as response to complaint number C2025-061.

1. As to allegation number 1, I purchased services from Campaign Research and Strategy, Inc. On November 8, 2022, I received an invoice for \$1400 for these services.

I did not have sufficient campaign funds in my account to pay the full amount at the time and paid \$500 toward the balance on March 27, 2023. From that point, I intended to continue to donate funds into my account and make recurring payments on the balance until it was paid in full. Due to the outstanding balance on this invoice, I kept my campaign account open.

The complaint is correct that I reported no payments for the subsequent reporting periods, and the reason for that is simple; I made no payments during those reporting periods. The balance remained outstanding and as a result, my campaign account remained open so that I may continue to receive contributions and make payment to retire the debt.

Unfortunately for me, I was unable to obtain any further donations after the election. On July 17, 2025, I was able to deposit sufficient personal funds into my campaign account and pay off the outstanding \$900 balance in full on the subject invoice.

That same day, I contacted Tige Watts, the owner of Campaign Research and Strategy, Inc. (CRS) and confirmed the \$900 payment fully satisfied my outstanding debt to his company for services rendered during the 2022 campaign. I apologized to him for the delay and admitted that I had simply forgotten to make recurring payments.

Therefore, as to the allegation in the complaint, payments for the full \$1400 invoice were made and reported during the periods in which they occurred, on March 27, 2022 and July 17, 2025, respectively, and the matter is concluded.

2. As to allegation number 2, I fully deny the allegation. The amount of the invoice from Campaign Research and Strategy, Inc. and Tige Watts reflect the services provided to my campaign. That is the only invoice I received from Mr. Watts or CRS for services rendered, and it fairly and entirely reflects the services provided.

My campaign was a financially fledgling one. For a variety of reasons, I struggled to raise outside funds and never had the money to access services that other candidates with more funding may have been able to purchase. I work as a federal employee in my primary day job. As a result, I must also comply with the Hatch Act, which limits certain political activities of federal employees who work in connection with federally funded programs. This curtailed my ability to fund raise as I had to be very deliberate and cautious in soliciting and accepting donations. I could not open my campaign to mass solicitations that were available to other candidates. This put me at a tremendous fundraising disadvantage to my peers.

Certainly, I wanted and initially planned to do all sorts of things with my campaign. Several emails cited by the Complainant reflect planning conversations that I had with Mr. Watts during the early stages of the campaign (Aug-Sept). These were services that I hoped to purchase for my campaign. I wanted to hire a professional campaign manager. I wanted to send out mailers. I wanted to run advertisements on my web site. I wanted to be able to match everything that my opponents were able to do. (Again, to the extent allowed by Hatch). But I simply was unable to raise the amount of money needed to execute those plans. As a result, those plans never

materialized. I did not send mailers. I did not run advertisements; I did not hire a campaign manager. I quite simply was not able and did not utilize the same services as other candidates. That is likely why the Complainant sees larger amounts spent with certain vendors (i.e. Tige Watts) on other campaigns than I was able to spend on mine. The other campaigns were most likely able to purchase more services from his company than I was.

The examples provided by the claimant in item number 2 of her claim do not amount to material services, certainly none that a financially disadvantaged candidate, like me, would be willing to pay someone else for. Several of his emails simply conveyed easily accessible public information that I, myself, could have obtained for free (Exhibit 8 - school district maps, Exhibit 9 - previous SEC filings of opponents, Exhibit 15 - voter turnout reports). Therefore, the market value of those items is zero.

Furthermore, Exhibits 11 and 12 – edits to my bio and a fundraising letter are immaterial and of minimal value if any at all. My wife, who is a school teacher, ultimately performed the majority of drafting and editing my written information, as I valued her professional opinion above all, and it was free.

Regarding Exhibits 13 and 14 – pricing and invoicing for signs, I did as instructed and paid and reported the invoice to Velvetex.

Exhibit 16 is simply an email where Mr. Watts sent me back a copy of the logo that I created. The complainant makes the incorrect assumption that Mr. Watts designed my campaign logo. I, myself, designed my campaign logo. That was not a service that he performed for me. In this case, I was considering printing out materials and wanted to use the same copy of the file that was used for my signs. This email reflects Mr. Watts simply sending me the copy that he sent to Velvetex for my sign order.

Exhibit 10 displays an email that was initiated and sent by a third-party and not from me. I should not be liable for third party correspondence simply because I was copied on them. Additionally, the emails and information provided in Exhibits 17, 18, 19, 20 and 21 were originated by the third-party volunteer. Although Mr. Watts is copied as a recipient on the emails, that does not reflect or constitute me purchasing a service from him.

The bottom line is that items identified in the complaint are of zero value, or of such insignificant value that they do not warrant separate reporting. The \$1400 invoice that I received (and have now paid in full) to Mr. Watts fairly reflects the total value of all services he provided to my campaign. I would not have paid more than the \$1400 that I paid for the sum of all services he provided. I firmly believe that to be a fair price.

3. As to allegation number 3 in the complaint, I fully deny and reject the allegations and assumptions therein.

It is not fair, or rational, to compare my campaign to that of other candidates. First, I do not know the details of other campaigns or how other candidates spent their money. I only know the details of my campaign. As established above, my campaign was always struggling financially. I never had the funding to compete head-to-head with other campaigns. I was aware

that other candidates sent professional mailers. I could not. I had to print my own letters and envelopes from my home and mail them myself. I did the work. Mr. Watts never provided any mailing services for me.

The emails and information provided in Exhibits 17, 18, 19, 20 and 21 were originated or provided by a third-party volunteer (Beth Hutchison). Mrs. Hutchison is a former school board member and offered her guidance as a volunteer. Although Mr. Watts is copied as a recipient on the emails, that does not constitute me purchasing a service from him. Also, I am not entirely certain what meeting is being referenced in Exhibit 21, but do affirmatively know that I did not participate in such a meeting with Mr. Watts to prepare for the candidate forum. In fact, that email may reflect an invitation to the actual forum itself, in which I participated as a candidate panelist. I had no interaction with Mr. Watts at that meeting, nor do I even remember him as being in attendance.

4. The complaint states "Upon information and belief Scully was also promoted on the mailer for which Snipes paid Tige Watts \$5,200." This is absolutely false and simply did not occur. To my knowledge, neither me, nor my name, image and likeness ever appeared on any mailer during the course of the campaign. I certainly did not authorize or purchase such, as I never had the money to do so. During the campaign, especially early while I was still hopeful of meeting my fundraising goals, I explored a variety of campaign management, advertising, strategy and service options. But the funds needed to execute those plans never materialized and therefore, they simply did not occur.

Other candidates ran professional ads. I did not. Again, I could not afford the costs. I certainly wanted to and initially intended to hire Mr. Watts to do so. However, I never raised enough money to do it and therefore did not follow through with that plan.

One item that I was able to purchase, on my own, was an order of doorknob hangers from Trevett's printing. A former candidate and a campaign volunteer, Beth Hutchison, assisted me with placing that order. Originally, we planned to collaborate with the Snipes campaign and promote both candidates on it but ultimately decided to do them for my campaign only. I worked directly with the vendor, Trevetts, to design and order them. Mr. Watts had no role at all in that transaction. That expense is reported in my filings.

The bottom line here is that my campaign was independent of that of others and the service(s) that Mr. Watts provided for me was entirely separate and different from those he may have provided to others. If other candidates were able to purchase \$8000 or \$5000 in services from Mr. Watts, it doesn't mean that I did. The reality was I could not financially come close to being able to do that and simply did not receive the same services of other candidates. I did not hire or employ a Campaign Manager. I served as my own campaign manager, and when I couldn't, then my wife did. Outside of the signs from Velvetex, door hangers from Trevetts and a small order of business cards and magnets from Vistaprint, I did not utilize any other professionally printed media. Everything else, I designed, printed and distributed myself or with the help of volunteers.

The \$1400 in services that I purchased from Mr. Watts was all that I could afford...and even as evidenced in item number 1 of this complaint, I struggled mightily to even pay that. That is no

small expense and I firmly believe it fairly reflects the sum of all services provided to me and my campaign by Mr. Watts. I would not have been willing to pay more for the same level of service.

I deny the allegations in the complaint.

In researching the issues, I did discover some additional unreported expenses that occurred after the campaign ended. Although, I thought that I had cancelled my recurring expense accounts related to my campaign, my GoDaddy.com account later auto-renewed and began charging fees. These fees caused my campaign bank account balance to dip below the minimum balance threshold which then triggered servicing fees from my bank (Wells Fargo).

This happened for several months without my knowledge. I accept responsibility for this. Because I thought everything was shutdown and knew that I had not personally created expenditures in the account, I stopped logging into the account and simply forgot about it. Therefore, I did not catch the GoDaddy fees and bank service fees being charged. This was an oversight on my part. I have since worked with Erin Caughman from the State Ethics Commission in correcting and amending my reports as necessary. As of this writing, all of my expenses are accounted for, my debts fully paid, reporting is reconciled and final report has been submitted.

I appreciate the patience and assistance of everyone at the Commission. Erin was very pleasant to work with and extremely helpful in getting my reports back in order. I deny the specific allegations of the complaint, but I understand that I had errors in my reports that needed to be corrected. I accept full responsibility for those and ask for your fair deference. Ultimately, I take ownership of my mistakes and will accept your judgement.

Thank you for your consideration.

Kevin M. Scully

██████████

██████████

Kscully73@gmail.com

678-787-1414

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
Complaint C2025-061)
Catherine Huddle,)
Complainant.)
Kevin Scully,)
Respondent.)

BEFORE THE STATE ETHICS COMMISSION

NOTICE OF HEARING

The State Ethics Commission has determined that there is probable cause pursuant to Section 8-13-320(10)(i), Code of Laws, South Carolina, 1976, as amended, in the above-captioned complaint. The Commission will convene a formal hearing into the matter in accordance with Section 8-13-320(10)(i) & (j), Code of Laws, South Carolina, 1976, as amended, and State Ethics Commission Regulations, S.C. Code Ann. Regs. 52-707 (1997 Cum. Supp.) on Thursday, June 18, 2026 at 9:30 a.m. at the Commission Hearing Room located at: 201 Executive Center Drive, Suite 150, Columbia, South Carolina 29210.

The following allegation will be heard:

COUNT ONE
FAILURE TO USE CAMPAIGN BANK ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Kevin Scully, candidate for Lexington-Richland School District Five Board of Trustees, failed to use a campaign bank account for the following expenditures: \$27.51 to GoDaddy.com on August 11, 2022; \$175.00 to Scott Krause Photography on August 18, 2022, six (6) expenditures totaling \$226.96 to Amazon occurring between August 31, 2022 and October 19, 2022, all in violation of Section 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 Walker Dayson, Executive Director
State Ethics Commission

Dated this 19th day,
of March 2026.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on RESPONDENT Kevin Scully, 111 Belfair Road, Irmo, SC 29063 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 23 day of March 2026, by CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED, appropriate postage affixed, and a return address clearly indicated on said envelope.



Erin Caughman
State Ethics Commission

Columbia, South Carolina

(803) 253-4192

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

IN THE MATTER OF:)
COMPLAINT C2025-061)

Catherine Huddle,)
Complainant,)

Kevin M. Scully,)
Respondent.)
_____)

BEFORE THE STATE ETHICS COMMISSION

CONSENT ORDER

This matter comes before the State Ethics Commission (Commission) by way of a Complaint filed on June 20, 2025. Pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act (Ethics Act), the Complaint against Kevin Scully (Respondent) was considered by the Commission and probable cause was found to warrant an evidentiary hearing. Prior to the call of the case, Respondent agreed to the following:

STATEMENTS OF FACT

1. Respondent ran for, and secured, a position on the Lexington-Richland School District Five (District) Board of Trustees (Board) in the 2022 general election.
2. During this election cycle, Respondent explored various services from Tige Watts/Campaign Research and Strategy (Watts/CRS). Ultimately, Respondent retained Watts/CRS for the following phone-banking services: 1) "automated calling services to registered and likely voting targets in Richland County School District Five for School Board candidate Kevin Scully," and 2) "Peer 2 Peer text banking to registered and likely voting targets in Richland County School District Five for School Board candidate Kevin Scully."
3. A Complaint was received from Catherine Huddle (Complainant) on June 20, 2025, alleging Respondent failed to fully disclose campaign expenditures for the phone banking to Watts/CRS

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on his Campaign Disclosure Reports (CDR). Alternatively, the Complaint alleged that additional services were provided by Watts/CRS and constituted an in-kind contribution which should have been disclosed on Respondent's CDRs. In support of this allegation, Complainant provided the following:

- A November 3, 2022 through November 5, 2022 email thread between Watts and Respondent regarding scripts for robocall and text campaigns.
- A November 8, 2022 email from Watts to Respondent containing an invoice in the amount of \$1,400.00 for the text and robocall services.
- A January 26, 2023 through January 31, 2023 email thread between Watts and Respondent, wherein Watts followed up on the payment of the November invoice and the parties decided Respondent would pay in installments over time, as he was able.
- An excerpt from an August 12, 2024 transcript in the matter of *Loveless v. Scully*, 2022-CP-40-01307, in which Watts identified Respondent as a client of his, and described a \$100.00 contribution made by him to Respondent.
- An August 15, 2022 email from Watts to Respondent, wherein Watts identified his email address and included a hyperlink to the South Carolina Revenue and Fiscal Affairs Office's GIS and Mapping home page.
- An August 15, 2022 email from Watts to Respondent, containing only an attachment to Tifani Moore's (Respondent's opponent) filed and publicly available Statement of Intention for Candidacy.
- A September 20, 2022 email from Beth Hutchison to Respondent and Watts, wherein Hutchison sought advice from Watts as to how to respond to allegations Hutchison had encouraged Moore to participate in the election as a candidate.
- An August 17, 2022 email from Respondent to Watts seeking review of a biographical blurb Respondent drafted.
- An August 25, 2022 email thread between Respondent and Watts regarding Respondent's fundraising letter and Watts' revisions to the same.
- An August 29, 2022 through September 1, 2022 email thread between Watts and Respondent regarding the pricing for various sizes of signage from Velvetex.
- A September 2, 2022 email from Watts to Respondent with an invoice from



Velvetex and directions for payment of that invoice by check directly to Velvetex.

- An October 17, 2022 email from Watts to Respondent with precinct turnouts for Lexington and Richland counties.
- An October 18, 2022 email from Watts to Respondent containing an attachment titled "Scully-Final Logo Signs.png."

4. The Complaint also alleged Respondent improperly benefitted from services Watts/CRS provided to Kimberley Snipes, Michael Satterfield, and Scott Herring (other candidates in the same election cycle). More specifically, the Complaint alleged Watts/CRS treated these candidates, including Respondent, as a group when providing campaign management services, which included an analysis of the 2020 election, suggested sign locations, information on District schools, information about how to participate in local parades, and preparation for a candidate forum. The Complaint noted the other candidates' payments to Watts/CRS exceeded those of Respondent's and contended that either Respondent accepted improper contributions from these other candidates in the form of shared advertisement, or that Watts/CRS improperly covered Respondent's portion of these costs. In support of this allegation, Complainant provided the following:

- An August 24, 2022 email from Hutchison to Watts and Respondent, Snipes, Herring, Satterfield, and each of their spouses, emphasizing the importance of campaign strategy and including an attachment titled "Analysis of the 2020 school board campaign."
- An August 25, 2022 email from Hutchison to Watts, Respondent and his wife, and Snipes, with an attachment purporting to show a list of locations previous Board candidates placed campaign signage.
- An August 27, 2022 email thread from Hutchison to Watts and Respondent, Snipes, Herring, Satterfield, and each of their spouses containing links to the following: a list of District schools and their addresses; the magnet school information page of the District's website; the Title One schools criteria page on the District website; a list of Title One schools in the District; and an attachment that purported to "help[]

JA #3

clarify which schools serve the voters in your county.” Respondent replied with thanks.

- A September 1, 2022 through September 2, 2022 email thread beginning with an email from Hutchison to Watts and Respondent, Snipes, Satterfield, Herring, and each of their spouses regarding the Chapin Labor Day Parade.
 - A September 7, 2022 email invitation from Hutchison to Watts, Respondent and his wife, and Snipes and her husband. The calendar invite was for an October 3, 2022 school board candidate forum.
5. The Complaint further alleged “upon information and belief [Respondent] was also promoted on the mailer for which Snipes paid [Watts/CRS] \$5,200.00.”
 6. During the Commission’s investigation, Commission Investigator Kevin Hinson reviewed the Complaint and attachments, records received pursuant to subpoena from Wells Fargo and Stripe, newspaper articles, social media sites, and Respondent’s CDRs.
 7. Respondent submitted a written response to the Complaint stating he purchased phone banking services from Watts/CRS in the amount of \$1,400.00. Respondent noted he paid for these services in two separate payments and that those payments are reflected in the Quarter 1 2023 CDR and the Quarter 3 2025 CDR. Review of these CDRs confirmed this.
 8. Respondent advised that documents shared by Watts were available to the public for free or were related to planning conversations he had with Watts with the hope of purchasing additional services, which he ultimately could not afford. Respondent further advised that he personally designed his campaign logo, without assistance from Watts.
 9. As to the emails received by Respondent from Hutchison, Respondent asserted that the fact that he was included on an email thread was not an indication of services purchased or provided. Respondent noted Hutchison was a former school board member and offered her guidance as a volunteer. To Respondent’s recollection, the calendar invitation Hutchison sent

JA #4

was for the candidate forum itself, in which Respondent was a panelist and all candidates were given the opportunity to participate.

10. Further, Respondent stated he did not appear on Snipes' mailers.
11. In addition to reviewing documents, Investigator Hinson conducted interviews with Respondent, Watts, and Snipes.
12. Watts stated he has known Respondent since 2021 and that he provided robo-calls and text campaign services for Respondent's 2022 election. Additionally, Watts stated that Respondent made two separate payments for these services, one for \$500.00 and a later payment of \$900.00.
13. Watts acknowledged that he obtained price estimates for Respondent's Velvetex signage order, but noted that Respondent created his own designs and paid Velvetex for the signs directly.
14. Watts also acknowledged he may have provided suggestions as to Respondent's website content, but that he did not provide him with any campaign services in this regard.
15. Watts stated he has known Hutchison for twenty years, and acknowledged communicating with her about several campaigns in the District during the 2022 election cycle.
16. During the interview with Snipes, Investigator Hinson inquired about the campaign expense to Watts/CRS for mailers. When asked if Respondent appeared or was promoted in the mailer, Snipes stated Respondent's name, image, nor likeness appeared in Snipes' campaign mailers as alleged. Snipes also informed Investigator Hinson that Hutchison was a volunteer who helped candidates with their campaigns.
17. While reviewing Respondent's campaign bank account records and CDRs related to the Complaint, Investigator Hinson identified the following inconsistencies:
 - Contributions not disclosed: six personal contributions from Respondent to his campaign bank account totaling \$1,584.08.

JH #5

- Expenditures not disclosed: \$53.67 to Walmart; two expenditures of \$38.46 to GoDaddy.com; two expenditures of \$57.72 to GoDaddy.com; one expenditure of \$22.17 to GoDaddy.com; and thirteen bank service fees in the amount of \$10.00 each to Wells Fargo.
- Campaign transactions made from Respondent's personal account rather than his campaign bank account: \$27.51 expenditure to GoDaddy.com; \$175.00 expenditure to Scott Krause Photography; and six expenditures to Amazon totaling \$226.33.

18. Investigator Hinson spoke with Respondent on January 7, 2026 regarding his findings and Respondent confirmed the contributions and expenditures identified.

19. On February 9, 2026, Respondent met with Commission staff and amended his CDRs. Respondent is currently in compliance.

LAW

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

1. At all times relevant, Respondent was a candidate or a public official for the purposes of the Ethics Act. Therefore, the Commission has personal and subject matter jurisdiction.
2. Section 8-13-1300 establishes the following definitions:

(7) "Contribution" means a gift, subscription, loan, guarantee upon which collection is made, forgiveness of a loan, an advance, in-kind contribution or expenditure, a deposit of money or anything of value made to a candidate [] for the purpose of influencing an election; or payment or compensation for the personal service of another person which is rendered for any purpose to a candidate [] without charge. "Contribution" does not include: (a) volunteer personal services on behalf of a candidate [] for which the volunteer receives no compensation...

...

(12) "Expenditure" means a purchase, payment, loan, forgiveness of a loan, an advance, in-kind contribution or expenditure, a deposit, transfer of funds, gift of money, or anything of value for any purpose.

...

JS #6

(20) "In-kind contribution or expenditure" means goods or services which are provided to or by a person at no charge or for less than their fair market value.

3. Section 8-13-1308 provides, in relevant part:

(A) Upon the receipt or expenditure of campaign contributions or the making of independent expenditures totaling an accumulated aggregate of five hundred dollars or more, a candidate must file an initial certified campaign report within ten days of these initial receipts or expenditures.

(B) Following the filing of an initial certified campaign report, additional certified campaign reports must be filed within ten days following the end of each calendar quarter in which contributions are received or expenditures are made.

...

(F) Certified campaign reports detailing campaign contributions and expenditures must contain: (1) the total of contributions accepted by the candidate or committee; (2) the name and address of each person making a contribution of more than one hundred dollars and the amount and date of receipt of each contribution; (3) the total expenditures made by or on behalf of the candidate or committee; (4) the name and address of each person to whom an expenditure is made from campaign funds, including the date, amount, purpose, and beneficiary of the expenditure.

4. Section 8-13-1312 provides, in relevant part:

Except as otherwise provided under Section 8-13-1348(C), expenses paid on behalf of a candidate must be drawn from the campaign account and issued on a check signed by the candidate or a duly authorized officer of a committee. All contributions received by the candidate , directly or indirectly, must be deposited in the campaign account by the candidate within ten days after receipt.

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

6. Section 8-13-320(10)(l) allows the Commission to assess a \$2,000.00 civil penalty for each violation of the Ethics Act.

DISCUSSION

The Complaint alleged Respondent did not disclose his payments to Watts/CRS for phone-banking. However, the evidence shows Respondent made two payments equal to the value of the

AK #7

invoice from Watts/CRS, and that each of these payments was properly disclosed in Respondent's CDRs. Additionally, the Commission finds there is insufficient evidence to support the allegation that Respondent received a contribution in the form of payment for services on his behalf or in the form of an in-kind contribution. The investigation did not reveal any evidence that Respondent was featured on Snipes' mail-issued advertisement or that he received any type of benefit or contribution from services Watts/CRS provided to Snipes, Satterfield, or Herring. Respondent's mere presence on an email thread initiated by Hutchison that also contained Watts is insufficient to constitute a contribution from Watts to Respondent. Moreover, Hutchison provided uncompensated volunteer services for the 2022 election cycle, and therefore any benefit gained from her interactions with Respondent did not constitute an in-kind contribution. Thus, the Commission did not find probable cause existed to substantiate the allegations in the Complaint.

However, as explained above and pursuant to S.C. Code Ann. Regs. 52-705(C)(2), the Commission found probable cause to charge Respondent with one (1) count of violating Section 8-13-1312 for using a personal bank account rather than a campaign bank account.¹ Through this Consent Order, Respondent acknowledges he violated the Ethics Act by failing to use a campaign bank account in each of the identified transactions. In mitigation, Respondent stated that 2022 was his first election cycle and that he used personal funds to purchase campaign items early on in his campaign prior to establishing his campaign bank account. Respondent states that he has cured the defects in his reporting and is currently in compliance.

DISPOSITION

1. The Commission finds Respondent in violation of one (1) count of Section 8-13-1312.

¹ The Commission also found probable cause existed to believe Respondent failed to disclose the aforementioned campaign contributions and expenditures in violation of Section 8-13-1308. However, given that Respondent has since disclosed this activity, the Commission declines to proceed on these charges.

A handwritten signature in blue ink, followed by the number 8.

2. The Commission adopts the Statements of Fact, Conclusions of Law, Discussion, and Disposition as agreed upon by the Respondent.

THEREFORE, the Commission hereby issues this written warning and orders Respondent to pay the Commission, within one-hundred and twenty (120) days of receipt of this Order, an administrative fee of \$400.00. The Commission declines to assess a civil penalty in light of the facts and mitigation outlined herein.

By executing this Consent Order, Respondent understands that he is confessing to a judgment of \$400.00 if he does not make payment as provided for in this Order, in which case the Commission shall file a Judgment against Respondent with the County Clerk of Court in Respondent's last known County of residence, who shall enter this Order in the amount of \$400.00 (less any monies paid) in its Judgment Rolls, without cost to the Commission.

AND IT IS SO ORDERED, THIS 16th DAY OF April, 2026.

STATE ETHICS COMMISSION


F. XAVIER STARKES, CHAIRMAN


KEVIN M. SCULLY, RESPONDENT