Official Use Only
Date Received:

STATE ETHICS COMMISSION
RECEIVED MAR 28 '25 PM 1:57:3 C2022-023

Rev. 11/2025

STATE ETHICS COMMISSION
201 Executive Center Drive
Suite 150
Columbia, SC 29210
ETHICS ACT COMPLAINT FORM

Section 1. READ BEFORE COMPLETING THIS FORM:

Investigative Authority: The Ethics, Government Accountability, and Campaign Reform Act (the Act) gives the State Ethics Commission (Commission) the authority to investigate complaints against candidates, public officials, public members, public employees, at the state or local government level in South Carolina as well as lobbyists, and lobbyist's principals.

The Commission has the authority to investigate violations of Title 8, Chapter 13 of the South Carolina Code of Laws, Title 2, Chapter 17 of the South Carolina Code of Laws, Title 59, Chapter 150 of the South Carolina Code of Laws, various provisions of Title 42, Chapter 3 of the South Carolina Code of Laws, and various provisions of Title 58, Chapter 3 of the South Carolina Code of Laws

Statute of Limitations: Pursuant to Section 8-13-320(9)(d) of the Act, the Commission cannot take action on a complaint more than four years after the violation is alleged to have occurred.

Blackout Period: Pursuant to Section 8-13-320(9)(b)(1) of the Act, no complaint may be accepted against a candidate for elective office during the fifty-day period before an election in which he is a candidate.

Please note that the Commission does not have the jurisdiction to investigate alleged violations of South Carolina's Freedom of Information Act, violations of the criminal code, instances of rude or discourteous treatment, federal officials, or violations of local ordinances, policies, or procedures.

Section 2. PROCEDURES FOR SUBMITTING A COMPLAINT:

Complaints must be submitted by mailing the original of a fully completed complaint form to the Commission at 201 Executive Center Drive, Suite 150, Columbia, SC 29210. Failing to completely fill out the complaint form will result in the form being returned to you without an investigation being opened. Complaint forms must be either typed or written in clear, legible handwriting.

Both the Complainant and the Respondent have the right to be represented by legal counsel of their choosing. If either the complainant and/or the respondent chooses to be represented by legal counsel, they do so at their own expense.

Section 3. CONFIDENTIALITY:

Complaint forms become public documents if the Commission finds probable cause that a violation of law has occurred. Please note that upon receiving a properly filed complaint form, the Commission will share an unredacted copy of the complaint with the Respondent whether or not an investigation is ordered.

Section 4. COMPLAINT ACKNOWLEDGEMENT:

Please check each circle to acknowledge that you have read and understand the following:

- ✓ I understand that I may be called to testify in an administrative or criminal proceeding should probable cause be found on this matter.
- ✓ I understand that I may be subpoenaed to sit for a deposition where I will be required to answer questions under oath.
- ✓ I understand that my name, address, and phone number will be shared with the Respondent.
- ✓ I understand that my name may be made public by the Respondent or the Commission.

Section 5. CHECK THE POSITION OF THE PERSON AGAINST WHOM THIS COMPLAINT IS FILED:

- o Candidate for public office
- ✓ Elected official at the state or local level
- o Employee of local or state government
- o Lobbyist
- o Lobbyist's Principal
- o Member of South Carolina Legislature
- o Public member (a person appointed to a part-time board, commission, or council at the state or local level)

Section 6. COMPLAINANT AND RESPONDENT INFORMATION:

I. PERSON BRINGING THE COMPLAINT (COMPLAINANT)			
Name:	MARTIN LAWRY		
Address:	[redacted]		
City:	LAURENS	**State:**	SC **Zip Code:** 29360
Telephone	[redacted]	**Email Address:**	MARTIN@THOMASMECHANICAL.COM
II. PERSON AGAINST WHOM COMPLAINT IS BROUGHT (RESPONDENT)			
Name:	ALICIA SULLIVAN		
Address:	[redacted]		
City:	LAURENS	**State:**	SC **Zip Code:** 29360
Telephone	[redacted]		

Section 7. THE INFORMATION CONTAINED IN THIS COMPLAINT COMES FROM:

- o Personal knowledge
- o Media Reports
- o From a third-party
- ✓ Other
  - o Please specify: SC ETHICS WEBSITE

Section 8: STATEMENT OF FACTS (Please state the actions of the Respondent upon which your ethics complaint is based):

MS. SULLIVAN (LAURENS CITY COUNCIL DIST. 2) HAS FAILED TO FILE STATEMENT OF ECONOMIC INTEREST AS REQUIRED BY LAW FOR 2022, 2023, 2024, 2025. SHE HAS BEEN AND CONTINUES TO BE AN ELECTED COUNCIL MEMBER.

Section 9. VERIFICATION BY OATH OR AFFIRMATION - ORIGINAL NOTARY AND SIGNATURES REQUIRED:

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

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

[redacted]
Complainant Signature

Sworn to and subscribed before me this
19th day of March, 2026

[redacted]
Notary Public for South Carolina

My Commission expires July 16, 2035



STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	)	BEFORE THE STATE ETHICS COMMISSION
IN THE MATTER OF:	)	
Complaint C2026-023	)	
Martin Lowry Complainant.	)	**NOTICE OF HEARING**
Alicia Sullivan Respondent.	)	

The State Ethics Commission has determined that there is probable cause pursuant to Section 8-13-320(10)(i), Code of Laws, South Carolina, 1976, as amended, in the above-captioned complaint. The Commission will convene a formal hearing into the matter in accordance with Section 8-13-320(10)(i) & (j), Code of Laws, South Carolina, 1976, as amended, and State Ethics Commission Regulations, S.C. Code Ann. Regs. 52-707 (1997 Cum. Supp.) on Thursday, August 20, 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 allegations will be heard:

COUNT ONE
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to file a Statement of Economic Interests on or before March 30, 2023, in violation of Section 8-13-1140.

COUNT TWO
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to file a Statement of Economic Interests on or before March 30, 2024, in violation of Section 8-13-1140.

COUNT THREE
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to file a Statement of Economic Interests on or before March 30, 2025, in violation of Section 8-13-1140.

COUNT FOUR
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to file a 2026 Statement of Economic Interests on or before March 30, 2026, in violation of Section 8-13-1140.

COUNT FIVE
FAILURE TO REPORT INCOME ON STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1120, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to report government income on a 2023 Statement of Economic Interests, in violation of Section 8-13-1120.

COUNT SIX
FAILURE TO REPORT INCOME ON STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1120, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to report government income on a 2024 Statement of Economic Interests, in violation of Section 8-13-1120.

COUNT SEVEN
FAILURE TO REPORT INCOME ON STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1120, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to report government income on a 2025 Statement of Economic Interests, in violation of Section 8-13-1120.

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.

[redacted]
Meghan Walker Dayson, Executive Director
State Ethics Commission

Dated this 21st day,
of May 2026

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on RESPONDENT Alicia Sullivan, 113 Hunters Court, Laurens, SC 29360 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 22 day of May 2026, by CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED, appropriate postage affixed, and a return address clearly indicated on said envelope.

[redacted]

Maquita S. Kessler, Paralegal
Columbia, South Carolina — State Ethics Commission — (803) 253-4192

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	)	BEFORE THE STATE ETHICS COMMISSION
IN THE MATTER OF:	)	
Complaint C2026-023	)	
Martin Lowry Complainant.	)	**AMENDED** **NOTICE OF HEARING**
Alicia Sullivan Respondent.	)	

The State Ethics Commission has determined that there is probable cause pursuant to Section 8-13-320(10)(i), Code of Laws, South Carolina, 1976, as amended, in the above-captioned complaint. The Commission will convene a formal hearing into the matter in accordance with Section 8-13-320(10)(i) & (j), Code of Laws, South Carolina, 1976, as amended, and State Ethics Commission Regulations, S.C. Code Ann. Regs. 52-707 (1997 Cum. Supp.) on Thursday, October 15, 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 allegations will be heard:

COUNT ONE
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to file a Statement of Economic Interests on or before March 30, 2023, in violation of Section 8-13-1140.

COUNT TWO
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to file a Statement of Economic Interests on or before March 30, 2024, in violation of Section 8-13-1140.

COUNT THREE
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to file a Statement of Economic Interests on or before March 30, 2025, in violation of Section 8-13-1140.

COUNT FOUR
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to file a 2026 Statement of Economic Interests on or before March 30, 2026, in violation of Section 8-13-1140.

COUNT FIVE
FAILURE TO REPORT INCOME ON STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1120, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to report government income on a 2023 Statement of Economic Interests, in violation of Section 8-13-1120.

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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.

[redacted]

Meghan Walker Dayson, Executive Director
State Ethics Commission

Dated this 13th day,
of July 2026

Certificate of Service by Certified Mail

I hereby certify that a copy of this **AMENDED NOTICE OF HEARING** was duly served on RESPONDENT Alicia Sullivan, 113 Hunters Court, Laurens, SC 29360 by depositing said **AMENDED NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 13 day of July 2026, by CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED, appropriate postage affixed, and a return address clearly indicated on said envelope.

[redacted]

Maquita S. Kessler, Paralegal
Columbia, South Carolina State Ethics Commission (803) 253-4192

South Carolina Ethics Commission
Attn: Marquita S. Kessler, Paralegal
201 Executive Center Drive, Suite 150
Columbia, SC 29210

July 16, 2026

Re: Request for Continuance – Complaint C2026-023, In the Matter of Alicia Sullivan

Dear Ms. Kessler:

I respectfully request a continuance of the hearing currently scheduled for August 20, 2026, due to serious medical circumstances that prevent my attendance.

On June 1, 2026, I was involved in a head-on motor vehicle collision that resulted in significant injuries. My right leg was broken in three places, requiring hospitalization and ongoing rehabilitation. Due to my medical condition and recovery status, I will not be physically able to attend the hearing in August.

Additionally, because I have remained in the hospital and rehabilitation facilities for an extended period, I have been unable to receive notices sent by regular mail. I recently received the Notice of Hearing by email. My family members will monitor my mailbox and promptly notify me of any response to this request.

I also currently do not have transportation because of the accident and my injuries. I respectfully request that the Commission grant continuance until I have sufficiently recovered and am medically able to participate in the proceedings.

I have included copies of documentation from my MyChart account reflecting my current medical condition, hospitalization, and rehabilitation. Should the Commission require additional medical documentation or verification, I am prepared to provide further records upon request.

Thank you for your consideration of this request. I respectfully ask that the Commission grant continuance until I have sufficiently recovered and am medically able to participate in these proceedings. Please confirm receipt of this correspondence and advise me of the Commission's decision regarding my request.

I am prepared to provide additional supporting medical documentation, upon your request.

Respectfully submitted,

Alicia Sullivan [redacted]

Complaint C2026-023

Telephone: 864-407-3154

Email: councilwomansullivan@gmail.com

Name: Alicia Latrina Sullivan [redacted]

Health Issues

Current Health Issues

Please review your health issues and verify that the list is up to date. **Call 911 if you have an emergency.**

MVC (motor vehicle collision) Started 6/1/2026	**Open displaced fracture of right patella** Started 6/1/2026	**Closed fracture of right tibial plateau** Started 6/1/2026
Closed fracture of proximal end of right fibula Started 6/1/2026	**Open right ankle fracture** Started 6/1/2026	**Type III open fracture of right ankle, initial encounter** Started 6/2/2026
Type I or II open fracture dislocation of right ankle joint Started 6/1/2026		

MyChart® licensed from Epic Systems Corporation© 1999 - 2026

[redacted]

7-16-2026

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND IN THE MATTER OF: Complaint C2026-023 MARTIN LOWRY, Complainant. ALICIA SULLIVAN, Respondent.	BEFORE THE STATE ETHICS COMMISSION **ORDER GRANTING RESPONDENT'S MOTION FOR CONTINUANCE**

This matter comes before the State Ethics Commission (Commission) on Respondent Alicia Sullivan's (Respondent) Motion for Continuance (Motion), which was submitted to the Commission on October 5, 2026. Respondent requests that the hearing scheduled for October 15, 2026, be continued as Respondent is currently receiving ongoing medical treatment.

The above-captioned hearing will be rescheduled.

And it is SO ORDERED!

[redacted]

Matthew N. Tyler
Chairman, Hearing Panel

October 7, 2026

Columbia, South Carolina

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	)	BEFORE THE STATE ETHICS COMMISSION
IN THE MATTER OF:	)	
Complaint C2026-023	)	
Martin Lowry Complainant.	)	**3RD AMENDED NOTICE OF HEARING**
Alicia Sullivan Respondent.	)	

The State Ethics Commission has determined that there is probable cause pursuant to Section 8-13-320(10)(i), Code of Laws, South Carolina, 1976, as amended, in the above-captioned complaint. The Commission will convene a formal hearing into the matter in accordance with Section 8-13-320(10)(i) & (j), Code of Laws, South Carolina, 1976, as amended, and State Ethics Commission Regulations, S.C. Code Ann. Regs. 52-707 (1997 Cum. Supp.) on Thursday, February 18, 2027, at 9:30 a.m. at the Commission Hearing Room located at: 201 Executive Center Drive, Suite 150, Columbia, South Carolina 29210.

The following allegations will be heard:

COUNT ONE
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to file a Statement of Economic Interests on or before March 30, 2023, in violation of Section 8-13-1140.

COUNT TWO
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to file a Statement of Economic Interests on or before March 30, 2024, in violation of Section 8-13-1140.

COUNT THREE
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to file a Statement of Economic Interests on or before March 30, 2025, in violation of Section 8-13-1140.

COUNT FOUR
FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to file a 2026 Statement of Economic Interests on or before March 30, 2026, in violation of Section 8-13-1140.

COUNT FIVE
FAILURE TO REPORT INCOME ON STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1120, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to report government income on a 2023 Statement of Economic Interests, in violation of Section 8-13-1120.

COUNT SIX
FAILURE TO REPORT INCOME ON STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1120, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to report government income on a 2024 Statement of Economic Interests, in violation of Section 8-13-1120.

COUNT SEVEN
FAILURE TO REPORT INCOME ON STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1120, S.C. CODE ANN., 1976, AS AMENDED

That Alicia Sullivan, member of Laurens City Council, failed to report government income on a 2025 Statement of Economic Interests, in violation of Section 8-13-1120.

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.

[redacted]
Meghan Walker Dayson, Executive Director
State Ethics Commission

Dated this 9th day,
of October 2026

Certificate of Service by Certified Mail

I hereby certify that a copy of this **3RD AMENDED NOTICE OF HEARING** was duly served on RESPONDENT Alicia Sullivan, 113 Hunters Court, Laurens, SC 29360 by depositing said **3RD AMENDED NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 7 day of October 2026, by CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED, appropriate postage affixed, and a return address clearly indicated on said envelope.

[redacted]

Maquita S. Kessler, Paralegal
State Ethics Commission (803) 253-4192

Columbia, South Carolina

State Ethics Commission
Received NOV17'26 PM 4:46

THE SOUTH CAROLINA STATE ETHICS COMMISSION

Martin Lowry, Complainant

v.

Alicia L. Sullivan, Respondent

Complaint No. C2026-023

RESPONDENT'S PRE-HEARING MOTION FOR PRODUCTION OF FILING RECORDS, REVIEW OF ALLEGED VIOLATIONS, AND ALTERNATIVE REQUEST FOR TECHNICAL-VIOLATION RELIEF

I, Alicia L. Sullivan, Respondent in the above-captioned matter, respectfully submit this pre-hearing motion concerning the seven allegations identified in the Third Amended Notice of Hearing dated October 7, 2026.

I submit this motion without counsel and respectfully request an opportunity to review the evidence supporting the allegations before the scheduled hearing on February 18, 2027.

I. Background and Filing History

1. I am an elected member of the Laurens City Council, District 2, and was also a candidate for Mayor of Laurens in 2023.
2. In reviewing my electronic filing history, I located two campaign-related filings dated November 2022 and an election and campaign report dated April 11, 2023.
3. I have not yet located a corresponding 2023 Statement of Economic Interests in the records available to me.
4. I understand that campaign disclosure reports and Statements of Economic Interests are separate reporting obligations. I respectfully request clarification and a complete examination of my filing records to determine whether any filings were omitted, incorrectly categorized, submitted late, or subsequently amended.
5. In prior years, I sought assistance from Commission personnel regarding the filing process. To the best of my recollection, I also received guidance regarding corrections to my 2022 filings.
6. Following a telephone communication concerning possible filing deficiencies, I accessed the electronic reporting system and took steps to update my filings. I request the Commission's electronic records to establish precisely which statements were submitted or amended and on what dates.

7. I further experienced difficulty obtaining administrative assistance through the former municipal clerk's office. I offer this information as background concerning my efforts to understand reporting requirements, not as a claim that municipal personnel were responsible for my individual filing obligations.

II. Request for Production and Examination of Records

To prepare an informed defense, I respectfully request copies of, or reasonable access to, the following records:

1. My complete Statements of Economic Interests filing history for reporting years 2022 through 2026, including original submissions, amendments, drafts to the extent retained, and electronic confirmation records.
2. The recorded submission dates and times for each SEI that is the subject of Counts One through Four.
3. Copies of the specific SEIs and entries relied upon in support of Counts Five through Seven, including the government-income disclosures alleged to be incomplete.
4. Copies of any notices of filing deficiencies, delinquency notices, certified-mail records, and related correspondence issued to me concerning the reporting years at issue.
5. Records identifying any electronic accounts or filing profiles associated with my service as a City Councilmember and my 2023 mayoral candidacy, to the extent maintained by the Commission.
6. The records, exhibits, and other nonprivileged evidence upon which the Commission intends to rely in support of each of the seven counts, subject to applicable disclosure rules and any appropriate protective limitations.

III. Request for Review of Counts One Through Four

Counts One through Four allege failures to submit annual Statements of Economic Interests by the applicable deadlines under S.C. Code § 8-13-1140.

I respectfully request that the Commission examine the actual electronic submission records and applicable filing deadlines for each year separately.

If the records establish that any required statement was timely filed or that a particular allegation is otherwise unsupported, I request dismissal of that count.

I further request consideration of the circumstances surrounding any verified late filing when determining the appropriate disposition and any applicable penalty.

Additional Request for Review Under S.C. Code of Regulations § 52-607(A)

I respectfully request that the Commission consider S.C. Code of Regulations § 52-607(A), concerning Statements of Economic Interests for candidates and incumbent public officials.

During 2023, I was serving as an elected member of Laurens City Council while also seeking election to the office of Mayor of Laurens.

I understand that this regulation recognizes an exception to an additional candidate SEI filing requirement for public officials who have already filed a Statement of Economic Interests during the same calendar year in which they declare candidacy.

Accordingly, I request that the Commission review my complete 2023 filing history and determine whether any Statement of Economic Interests submitted in connection with my existing elected position satisfied the applicable candidate filing requirement.

I further request that the Commission distinguish any additional candidate filing requirement from the separate annual filing obligation alleged in Count One.

This request is made without asserting that my campaign disclosure reports constituted Statements of Economic Interests or that a timely 2023 SEI has already been established.

I respectfully request dismissal of any allegation shown to be unsupported by the applicable filing records and law.

IV. Alternative Request Concerning Counts Five Through Seven

Counts Five through Seven allege omissions of government income from my 2023, 2024, and 2025 Statements of Economic Interests under S.C. Code § 8-13-1120.

I request the opportunity to review the actual statements and alleged omissions before responding to the factual basis of these counts.

To the extent the Commission determines that any errors or omissions were inadvertent, unintentional, and not an effort to violate the Ethics Act, I respectfully request consideration of the discretionary technical-violation provisions of S.C. Code § 8-13-1170(A).

This alternative request is made without conceding that every alleged omission occurred or that all seven counts are supported by the evidence.

V. Request for Pre-Hearing Conference

I respectfully request a pre-hearing conference, if appropriate, to address:

- The production and exchange of filing records and other relevant evidence;
- The factual and legal issues associated with each count;
- Any applicable technical-violation determination;
- Any counts that may be resolved or dismissed before the formal hearing; and
- Any additional procedural directions necessary for a fair hearing.

VI. Requested Relief

For the foregoing reasons, I respectfully request that the Commission:

A. Grant reasonable access to the requested records and evidence;

B. Review each alleged filing violation independently using the original electronic submission records;

C. Dismiss any count not supported by the applicable law and evidence;

D. Consider technical-violation treatment under S.C. Code § 8-13-1170(A) where legally applicable;

E. Schedule a pre-hearing conference or provide written procedural instructions concerning this motion; and

F. Grant such other appropriate relief as the Commission determines is warranted.

I respectfully reserve the right to supplement my response after receiving and reviewing the requested records.

Respectfully submitted,

Alicia L. Sullivan
Respondent, Self-Represented
P.O. Box 481
Laurens, SC 29360

Signature: [redacted]

Date: 11-16-26

Telephone: 864-407-3541

Email: [redacted]

Sworn before me this 16th of November 2026
Michanna Tate

MICHANNA TATE
Notary Public, State of South Carolina
My Commission Expires
December 8, 2031

CERTIFICATE OF SERVICE

I certify that on 11-16, 2026, I submitted the foregoing motion to the South Carolina State Ethics Commission and served a copy upon the attorney or other person designated to receive service for the opposing party in Complaint No. C2026-023, by the method or methods indicated below:

[ ] United States Mail

[✓] Certified Mail, Return Receipt Requested

[✓] Email, if accepted or authorized for service

Name and address/email of person served:

Marquita S. Kessler Paralegal MKessler@ethics.sc.gov
Meghan Walker Executive Director mwalker@ethics.sc.gov

Signature: [redacted]

Date: 11-16-2026