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**HOUSE ETHICS COMMITTEE APRIL 5, 2022
CONCURRENCE WITH STATE ETHICS COMMISSION'S
PROBABLE CAUSE FINDING AND
NOTICE OF PUBLIC HEARING
IN THE MATTER OF REP. JONATHAN D. HILL.
COMPLAINT NO. C. 2021-084**

Complainant: SC House Legislative Ethics
Committee

Address: 519 Blatt Building
Columbia, South Carolina 29201

Telephone: 803-734-3114

Respondent: Rep. Jonathon D. Hill

Address: P.O. Box 790
Star, South Carolina 29684

Telephone Number: (864) 245-5885

Attorney Information: Tom Fernandez

This is in response to the State Ethics Commission's (herein "SEC") Recommendation and Investigative Report (herein "Report") dated March 23, 2022. The House Legislative Ethics Committee (herein "Committee") met on April 5, 2022 and responds as follows.

BACKGROUND

Committee staff counsel routinely reviews ethics filings of candidates and members, to include quarterly campaign disclosure reports, for compliance purposes. Among the markers that

staff looks for in reviewing campaign disclosure reports are issues that necessitate the need to investigate an issue further, also referred to as “red flags.” Upon reviewing the original October, Pre-election 2020 and January 2021 quarterly filings, staff identified “red flags” concerning Rep. Jonathon Hill’s (herein “Respondent”) filings, namely that he reported negative cash on hand on two campaign disclosure reports at the time of filing. As such, staff contacted Respondent in early 2021 to review his negative balances and investigate why his campaign bank account and campaign disclosure reports did not reconcile. On or around January 2021, Respondent agreed to a three-year voluntary audit with an outside accounting firm, J.W. Hunt and Company, who conducts audits for the Committee. The audit examined Respondent’s campaign disclosure reports for the period from October 1, 2017 to December 31, 2020. During the audit process, Respondent was unable to provide adequate documentation pertaining to certain expenditures, namely a personal mortgage payment made using campaign funds.

On or around June 29, 2021, Committee staff received a copy of Respondent’s audit and identified numerous alleged violations of the SC Ethics Code to include: using campaign funds for personal expenditures, failing to report contributions and/or expenditures on campaign disclosure reports, failing to process campaign-related expenditures and/or contributions through the campaign bank account, failing to accurately report the monetary amount of contributions and/or expenditures on campaign disclosure reports, failing to properly report in-kind contributions and expenditures, and failing to deposit contributions within ten days of receipt. The Committee met on September 15, 2021 and referred the complaint to the SEC. On September 21, 2021, Executive Director of the SEC, Meghan L. Walker, reviewed the complaint, determined it contained facts sufficient, and ordered an investigation. On March 21, 2022, the SEC having met, considered, and duly investigated the Complaint against Respondent, issued a recommendation to the Committee for a finding of probable cause. Specifically, the SEC recommended that the Committee find probable cause is present and charge Respondent with the following:

1. Six (6) counts of violating Section 8-13-1308(F)(2) for failing to report itemized contributions of more than \$100.00;
2. Seven (7) counts of violating Section 8-13-1312 for failing to deposit contributions into a campaign bank account;
3. Eleven (11) counts of violating Section 8-13-1308(F)(4) for failing to report expenditures paid from the campaign bank account;
4. Thirteen (13) counts of violating Section 8-13-1312 for failing to make campaign expenditures from his campaign bank account;
5. Twelve (12) counts of violating Section 8-13-1312 for failing to deposit check contributions into a campaign bank account within fifteen (15) days of receipt;
6. Sixty-one (61) counts of violating Section 8-13-1312 for failing to deposit Anedot contributions into a campaign account within fifteen (15) days of receipt;
7. Four (4) counts of violating Section 8-13-1308(F)(2) for failing to report contributions exceeding \$100 on an October 10, 2020 Campaign Disclosure Report (CDR);
8. Fourteen (14) counts of violating Section 8-13-1314(A)(2) for accepting cash contributions in excess of \$25;

9. Six (6) counts of violating Section 8-13-1308(F)(1) for failing to report unitemized contributions less than \$100 on each of the following CDRs: January 10, 2020, April 10, 2020, 2020 Pre-Election, July 10, 2020, October 10, 2020, and January 10 , 2021;
10. Three (3) counts of violating Section 8-13-1348 for using campaign funds for personal expenditures;
11. One (1) count of violating Section 8-13-1302(A)(2) for failing to maintain a record of cash contributions received; and
12. One (1) count of violating Section 8-13-1312 for making campaign expenditure from a Rally fundraising account instead of a campaign bank account.

On April 5, 2022, the Committee met to consider this matter.

DETERMINATIONS

Respondent is a public official via his position as a member of the SC House of Representatives. He was first elected in 2015 and has served continuously since that time. Upon review of the SEC's recommendation and relevant evidence, the Committee makes the following determinations:

COUNTS 1 - 6

Failure To Report Itemized Contributions Of More Than \$100.00 S.C. Code § 8-13-1308(F)(2)

S.C. Code Section 8-13-1308(F)(2) provides that certified campaign reports detailing campaign contributions and expenditures must contain 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.

The investigation of Respondent's campaign disclosure reports and bank statements indicates that there were 12 instances in which contributions were deposited into the campaign bank account but not properly or timely reported on the corresponding campaign disclosure report. Of these, six contributions fell below the \$100 threshold requiring itemized reporting; however, these contributions were still required to be included in a report of unitemized contributions for the corresponding reporting period. Six contributions exceeded the \$100.00 threshold for itemized reporting. These instances are listed in **Table 1, Contributions Exceeding \$100 Deposited into Campaign Bank Account but not Initially Reported on CDR**, which is attached hereto and made a part hereof.

Therefore, the Committee determines that there is competent and substantial evidence that violations of Chapter 13, Title 8 have occurred, and thus, concurs with the SEC's probable cause finding regarding Respondent violating S.C. Code Section 13-1308(F)(2) for failing to file quarterly Campaign Disclosure Reports; 6 counts.

COUNTS 7 - 13

Failure To Deposit Contributions Into A Campaign Bank Account S.C. Code § 8-13-1312

S.C. Code Section 8-13-1312 provides, *inter alia*, that all contributions received by the candidate, directly or indirectly, must be deposited in the campaign account by the candidate within ten days after receipt. All contributions received by an agent of a candidate must be forwarded to the candidate not later than five days after receipt.

In comparing Respondent's campaign bank account activity to information reported on his campaign disclosure reports, seven instances were noted in which contributions were reported on his campaign disclosure reports but there was no corresponding deposit into the campaign bank account. These instances are listed in **Table 2, Contributions Reported on CDR but not Deposited into Campaign Bank Account**, which is attached hereto and made a part hereof. One contribution Respondent identifies as being deposited incorrectly into a personal account, and funds being transferred from a personal account for the amount of that contribution. Three of these contributions were reported as from Respondent as in-kind contributions paid out of pocket. The \$10,000.00 contribution Respondent identified as being paid out of pocket to the Law Office of Brooks R. Fudenburg, LLC. Though it was requested by investigators, Respondent did not provide supporting documentation or identification of the source of payment for this in-kind contribution.

Therefore, the Committee determines that there is competent and substantial evidence that violations of Chapter 13, Title 8 have occurred, and thus, concurs with the SEC's probable cause finding regarding Respondent violating S.C. Code Section 13-1312 for failing to deposit contributions into a campaign bank account; 7 counts.

COUNTS 14 - 24

Failure To Report Expenditures Paid From The Campaign Bank Account S.C. Code § 8-13-1308(F)(4)

S.C. Code Section 8-13-1308(F)(4) provides that certified campaign reports detailing campaign contributions and expenditures must contain 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.

In comparing Respondent's bank account activity to information reported on his campaign disclosure reports, eleven instances were noted in which expenditures were made from the campaign bank account but not reported on the corresponding CDR. These instances are listed in **Table 3, Expenditures made from Campaign Bank Account but not Reported on CDR**, which is attached hereto and made a part hereof. Six of these expenditures were reported on Respondent's campaign disclosure reports after the complaint was filed; however, five remain unreported.

Therefore, the Committee determines that there is competent and substantial evidence that violations of Chapter 13, Title 8 have occurred, and thus, concurs with the SEC's probable cause finding regarding Respondent violating S.C. Code Section 13-1308(F)(4) for failing to report expenditures paid from the campaign bank account; 11 counts.

COUNTS 25 - 37

Failure To Make Expenditures From His Campaign Bank Account S.C. Code § 8-13-1312

S.C. Code Section 8-13-1312 provides, *inter alia*, that a candidate shall not establish more than one campaign checking account and one campaign savings account for each office sought. Further, a candidate's accounts must be established in a financial institution that conducts business within the State and in an office located within the State that conducts business with the general public. 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.

In comparing Respondent's campaign bank account activity to information reported on his campaign disclosure reports, 13 instances were noted in which expenditures were reported on Respondent's campaign disclosure reports but there was no corresponding expenditure made from the campaign bank account. These instances are listed in **Table 4, Expenditures Reported on CDR but not Paid/Processed Through Campaign Bank Account**, which is attached hereto and made a part hereof. Respondent identified eight of these as expenditures he made out of pocket and did not process through the campaign bank account. The remaining five expenditures were all reported as payments to Red Mountain Direct for fundraising fees, which Respondent states were paid through RallyPay, an online platform Respondent used during his campaign.

Therefore, the Committee determines that there is competent and substantial evidence that violations of Chapter 13, Title 8 have occurred, and thus, concurs with the SEC's probable cause finding regarding Respondent violating S.C. Code Section 13-1312 for failing to make expenditures from his campaign bank account; 13 counts.

COUNTS 38 - 49

Failure To Deposit Check Contributions Into A Campaign Bank Account Within Fifteen (15) Days Of Receipt S.C. Code § 8-13-1312

S.C. Code Section 8-13-1312 provides, *inter alia*, that all contributions received by the candidate, directly or indirectly, must be deposited in the campaign account by the candidate within ten days after receipt. All contributions received by an agent of a candidate must be forwarded to the candidate not later than five days after receipt.

In reviewing contributions deposited into Respondent's campaign bank account in the form of a physical check, 36 instances were noted where the date of deposit occurred more than ten days after the date on the check. These instances are listed in **Table 5, Checks Deposited into Campaign Bank Account > 10 Days After Receipt**, which is attached hereto and made a part hereof. Section 8-13-1312 provides an additional five days in which to deposit contributions if provided to an agent of a candidate. Of the 36 instances notes, 12 checks were deposited more than fifteen days after the date of receipt.

Therefore, the Committee determines that there is competent and substantial evidence that violations of Chapter 13, Title 8 have occurred, and thus, concurs with the SEC's probable cause finding regarding Respondent violating S.C. Code Section 13-1312 for failing to deposit check contributions into a campaign bank account within fifteen days of receipt; 12 counts.

COUNTS 50 - 104
Failure To Deposit Anedot Contributions Into A Campaign Bank Account Within Fifteen (15) Days of Receipt
S.C. Code § 8-13-1312

S.C. Code Section 8-13-1312 provides, *inter alia*, that all contributions received by the candidate, directly or indirectly, must be deposited in the campaign account by the candidate within ten days after receipt. All contributions received by an agent of a candidate must be forwarded to the candidate not later than five days after receipt.

Respondent used the online platform, Anedot, to collect campaign contributions. In reviewing contributions deposited into Respondent's campaign bank account from Anedot, the State Ethics Commission initially noted 70 instances where the date of deposit occurred more than ten days after the contribution was collected. Of these, the State Ethics Commission initially noted that 61 were deposited more than fifteen days after the date of receipt. However, the Chief Investigator notes in her affidavit dated April 4, 2022 that six of these contributions were repeated inadvertently in its tables and revised the number of instances of contributions deposited more than fifteen days after the date of receipt to 55. These 55 instances are listed in **Table 6, Anedot Contributions Deposited into Campaign Bank Account > 10 Days After Receipt**, which is attached hereto and made a part hereof. Section 8-13-1312 provides an additional five days in which to deposit contributions if provided to an agent of a candidate.

Therefore, the Committee determines that there is competent and substantial evidence that violations of Chapter 13, Title 8 have occurred, and thus, concurs, in part, with the SEC's probable cause finding regarding Respondent violating S.C. Code Section 13-1312 for failing to deposit Anedot contributions into a campaign bank account within fifteen days of receipt; 55 counts. Further, the Committee determines that there is not competent and substantial evidence that the six contributions that were repeated inadvertently constitute violations of Chapter 13, Table 8, and thus nonconcur, in part, concerning those six instances.

COUNTS 105 - 108
Failure To Report Contributions Exceeding \$100 on an October 10, 2020 Campaign Disclosure Report (CDR)
S.C. Code § 8-13-1308(F)(2)

S.C. Code Section 8-13-1308(F)(2) provides that certified campaign reports detailing campaign contributions and expenditures must contain 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.

Respondent used the online platform, Rally to collect campaign contributions. The contributions received via Rally were compared with contributions reported on Respondent's campaign disclosure reports. This comparison revealed 141 instances where a contribution was received via Rally but not reported on a campaign disclosure report. Of these contribution, four exceeded the \$100.00 threshold for itemized reporting. These instances are listed in **Table 7, Contributions Exceeding \$100 Received via Rally but not Reported on a CDR**, which is

attached hereto and made a part hereof. The remaining 137 should have been reported as lump sum unitemized contributions on corresponding quarterly campaign disclosure reports.

Therefore, the Committee determines that there is competent and substantial evidence that violations of Chapter 13, Title 8 have occurred, and thus, concurs with the SEC's probable cause finding regarding Respondent violating S.C. Code Section 13-1308(F)(2) for failing to report contributions exceeding \$100 on an October 10, 2020 Campaign Disclosure Report; 4 counts.

COUNTS 109 - 122
Accepting Cash Contributions In Excess of \$25
S.C. Code § 8-13-1314(A)(2)

S.C. Code Section 8-13-1314(A)(2) provides that, within an election cycle, a candidate or anyone acting on his behalf shall not solicit or accept, and a person shall not give or offer to give to a candidate or person acting on the candidate's behalf a cash contribution from an individual unless the cash contribution does not exceed twenty-five dollars and is accompanied by a record of the amount of the contribution and the name and address of the contributor.

A review of Respondent's campaign bank account activity revealed 12 deposits of cash into the campaign bank account. These deposits are listed in **Table 8, Cash Deposits into Campaign Bank Account**, which is attached hereto and made a part hereof. Truist Bank (formerly SunTrust) confirmed that all contributions were deposited as cash. As noted in Table 8, none of these cash deposits had contributions for the same date and amount reported on a corresponding campaign disclosure report, and four of these cash deposits were comprised of multiple separate contributions. Three cash deposits remain unidentified to date. These deposits cannot be definitely identified, aside from Respondent's campaign disclosure reports, because there is no written instrument. Fourteen cash contributions as reported by Respondent exceeded the \$25.00 allowable cash limit.

Therefore, the Committee determines that there is competent and substantial evidence that violations of Chapter 13, Title 8 have occurred, and thus, concurs with the SEC's probable cause finding regarding Respondent violating S.C. Code Section 13-1314(A)(2) for accepting cash contributions in excess of \$25; 14 counts.

COUNTS 123 - 128
Failure To Report Unitemized Contributions Less Than \$100 On Each Of The
Following CDRs: January 10, 2020, April 10, 2020, 2020 Pre-Election, July 10, 2020,
October 10, 2020, and January 10, 2021
S.C. Code § 8-13-1308(F)(1)

S.C. Code Section 8-13-1308(F)(1) provides that certified campaign reports detailing campaign contributions and expenditures must contain the total of contributions accepted by the candidate or committee.

Respondent failed to report unitemized contributions less than \$100.00 on the following campaign disclosure reports:

- January 10, 2020 - See Tables 7 & 10
- April 10, 2020 - See Table 10
- 2020 Pre-Election- See Table 10
- July 10, 2020- See Table 7
- October 10, 2020 - See Tables 7 & 10
- January 10, 2021- See Table 10

Therefore, the Committee determines that there is competent and substantial evidence that violations of Chapter 13, Title 8 have occurred, and thus, concurs with the SEC's probable cause finding regarding Respondent violating S.C. Code Section 13-1308(F)(1) for failing to report unitemized contributions less than \$100 on each of the following CDRs: January 10, 2020, April 10, 2020, 2020 Pre-Election, July 10, 2020, October 10, 2020, and January 10, 2021; 6 counts.

COUNTS 129 - 131

S.C. Code § 8-13-1348, Using Campaign Funds For Personal Expenditures

S.C. Code Section 8-13-1348 provides that no public official may use campaign funds to defray personal expenses, which are unrelated to the campaign or the office if the candidate is an officeholder nor may these funds be converted to personal use.

A review of Respondent's campaign bank account activity revealed expenditures that appear personal in nature. These expenditures are listed in **Table 9, Personal Expenditures**, which is attached hereto and made a part hereof. In written responses to the Investigator, Respondent stated that he used his campaign funds to make a personal mortgage payment for \$1,186.83 and two expenditures to Audible for \$14.95 each. Respondent stated he made these payments using campaign funds in error and later reimbursed his campaign account for these personal expenditures.

Therefore, the Committee determines that there is competent and substantial evidence that violations of Chapter 13, Title 8 have occurred, and thus, concurs with the SEC's probable cause finding regarding Respondent violating S.C. Code Section 13-1348 for using campaign funds for personal expenditures; 3 counts.

COUNT 132

Failure To Maintain A Record Of Cash Contributions Received

S.C. Code § 8-13-1302(A)(2)

S.C. Code Section 8-13-1302(A)(2) provides that a candidate, committee, or ballot measure committee must maintain and preserve an account of the name and address of each person making a contribution and the amount and date of receipt of each contribution.

A review of Respondent's campaign bank account activity revealed deposits of cash into the campaign bank account, which cannot be definitely identified because there is no written instrument, accounting, receipt, or any other record of the cash received by Respondent.

Therefore, the Committee determines that there is competent and substantial evidence that violations of Chapter 13, Title 8 have occurred, and thus, concurs with the SEC's probable cause

finding regarding Respondent violating S.C. Code Section 13-1302 for failing to maintain a record of cash contributions received; 1 count.

COUNT 133

Making Campaign Expenditures From A Rally Fundraising Account Instead Of A Campaign Bank Account S.C. Code § 8-13-1312

S.C. Code Section 8-13-1312 provides, *inter alia*, that a candidate shall not establish more than one campaign checking account and one campaign savings account for each office sought. A candidate's accounts must be established in a financial institution that conducts business within the State and in an office located within the State that conducts business with the general public. 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.

Respondent paid Red Mountain Direct for fundraising fees directly through RallyPay, an online platform Respondent used during his campaign.

Therefore, the Committee determines that there is competent and substantial evidence that violations of Chapter 13, Title 8 have occurred, and thus, concurs with the SEC's probable cause finding regarding Respondent violating S.C. Code Section 13-1312 for making campaign expenditures from a Rally fundraising account instead of a campaign bank account; 1 count.

CONCLUSION

Thus, the Committee has determined that there is competent and substantial evidence that violations of Chapter 13, Title 8 have occurred. Accordingly, the Committee hereby **CONCURS** with the SEC's recommendation and probable cause finding regarding the following:

1. Six (6) counts of violating Section 8-13-1308(F)(2) for failing to report itemized contributions of more than \$100.00;
2. Seven (7) counts of violating Section 8-13-1312 for failing to deposit contributions into a campaign bank account;
3. Eleven (11) counts of violating Section 8-13-1308(F)(4) for failing to report expenditures paid from the campaign bank account;
4. Thirteen (13) counts of violating Section 8-13-1312 for failing to make campaign expenditures from his campaign bank account;
5. Twelve (12) counts of violating Section 8-13-1312 for failing to deposit check contributions into a campaign bank account within fifteen (15) days of receipt;
6. Fifty-Five (55) counts of violating Section 8-13-1312 for failing to deposit Anedot contributions into a campaign account within fifteen (15) days of receipt;
7. Four (4) counts of violating Section 8-13-1308(F)(2) for failing to report contributions exceeding \$100 on an October 10, 2020 Campaign Disclosure Report (CDR);
8. Fourteen (14) counts of violating Section 8-13-1314(A)(2) for accepting cash contributions in excess of \$25;

9. Six (6) counts of violating Section 8-13-1308(F)(1) for failing to report unitemized contributions less than \$100 on each of the following CDRs: January 10, 2020, April 10, 2020, 2020 Pre-Election, July 10, 2020, October 10, 2020, and January 10 , 2021;
10. Three (3) counts of violating Section 8-13-1348 for using campaign funds for personal expenditures;
11. One (1) count of violating Section 8-13-1302(A)(2) for failing to maintain a record of cash contributions received; and
12. One (1) count of violating Section 8-13-1312 for making campaign expenditure from a Rally fundraising account instead of a campaign bank account.

Further, the Committee hereby **NONCONCURS** with the SEC's recommendation and probable cause finding regarding the following:

1. Six (6) counts of violating Section 8-13-1312 for failing to deposit Anedot contributions into a campaign account within fifteen (15) days of receipt, as these were mistakenly repeated and included by typographical error by the SEC.

NOTICE OF PUBLIC HEARING

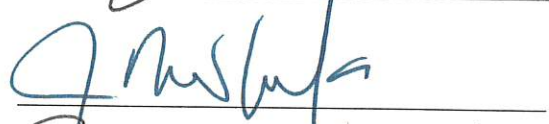
Therefore, the Committee deems it appropriate to convene a formal public hearing on this matter within 30 days at a time and place to be determined pursuant to South Carolina Code Section 8-13-540(D)(4)(b). See also House Rule 4.16(D)(8)(b); and House Ethics Committee Rule V.A.

AND IT IS SO ORDERED, this 5th day of April, 2022, by the following members of the House Ethics Committee:

Rep. Wallace H. "Jay" Jordan, Jr., Chairman



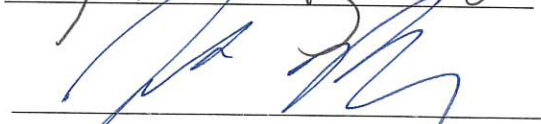
Rep. J. David Weeks, Vice-Chairman



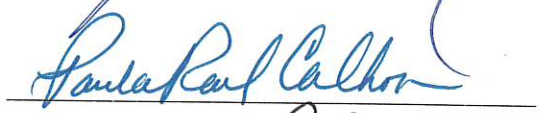
Rep. Beth E. Bernstein, Secretary



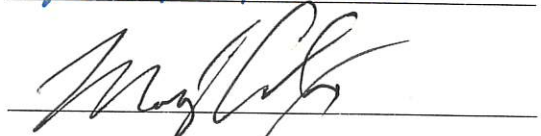
Rep. Justin T. Bamberg



Rep. Paula Rawl Calhoun



Rep. Micajah P. "Micah" Caskey IV



Rep. Neal A. Collins



Rep. J. Todd Rutherford



Rep. Leonidas E. "Leon" Stavrinakis



TABLE 1 -
Contributions Deposited Into Campaign Bank
Account but not Initially Reported on CDR

TAB E5.1 - Contributions Deposited into Campaign Bank Account but not Initially Reported on CDR

COUNT	POST DATE	TX DATE	DESCRIPTION	DEPOSIT	CHECK
1	10/9/2019	10/9/2019	Mobile App Transfer From [REDACTED]	\$350.00	
2	6/2/2020	6/2/2020	Deposit	\$250.00	3326
3	6/10/2020	6/10/2020	Mobile App Transfer From [REDACTED]	\$110.06	
4	8/21/2020	7/20/2020	Mobile check deposit	\$500.00	3570
5	10/2/2020	10/2/2020	Mobile App Transfer From [REDACTED]	\$500.00	
6	11/9/2020	11/5/2020	Mobile check deposit	\$200.00	2298

TABLE 2 -
Contributions Reported on CDR but not
Deposited into Campaign Bank Account

TABLE 2: Contributions Reported on GDR but not Deposited into Campaign Bank Account

COUNT	REPORT DATE	AMOUNT	CONTRIBUTOR	GDR
7	12/31/2018	\$50.00	Jonathon Hill	Jan 10, 2019 orig
8	7/5/2019	\$236.90	Jonathon Hill	Oct 10, 2019 Amend 1
9	9/9/2019	\$30.00	Jonathon Hill	Oct 10, 2019 Amend 1
10	9/16/2019	\$250.00	Jerry Seay	Oct 10, 2019 orig
11	6/20/2020	\$25.00	Mary Caraza	Jul 10, 2020 orig
12	6/20/2020	\$10.00	Ed Bland	Jul 10, 2020 orig
13	7/17/2020	\$10,000.00	Personal Loan in Loans section / Jonathon Hill	Oct 10, 2020 / Pre-Election orig

TABLE 3 -

**Expenditures made from Campaign Bank
Account but not Initially Reported on CDR**

TABLE 3 - Expenditures made from Campaign Bank Account but not Initially Reported on CDR

COUNT	POST DATE	PAY DATE	DESCRIPTION/BANK RECORDS	DEBIT
14	10/3/2019	10/3/2019	Mobile App Transfer To [REDACTED]	\$100.00
15	10/8/2019	10/8/2019	Mobile App Transfer To [REDACTED]	\$250.00
16	3/16/2020	3/16/2020	Paypal-Echeck Whitepages Electronic/ACH Debit	\$19.99
17	10/1/2020	9/30/2020	Facebook - recurring check card purchase	\$197.82
18	10/2/2020	10/2/2020	Google Gsuite_votehil Mountain Viewca recurring check card purchase	\$50.88
19	10/2/2020	10/2/2020	In Red Mountain Direc Ca 001 Point of Sale Debit	\$1,000.00
20	10/6/2020	10/5/2020	Google *Svcsvotehill.C G.Co/Heippay#Ca check card purchase	\$24.88
21	10/8/2020	10/8/2020	Credit Card Payment Mobile App Payment To [REDACTED]	\$300.00
22	12/8/2020	12/8/2020	Credit Card Payment Mobile App Payment To [REDACTED]	\$300.00
23	12/31/2020		Anedot fees	\$594.45
24	12/31/2019		Anedot fees	\$99.70

TABLE 4 -
Expenditures Reported on CDR but not
Paid/Processed Through Campaign Bank
Account

TABLE 4 - Expenditures Reported on CDR but not Paid/Processed Through Campaign Bank Account

COUNT	DATE	AMOUNT	VENDOR	DESCRIPTION ON CDR	CDR
25	3/24/2018	\$480.00	Justin Barber	Campaign video	Apr 10, 2018 orig
26	12/31/2018	\$50.00	Facebook		Jan 10, 2019 orig
27	7/15/2019	\$236.90	Franklin's Printing and Marketing	Constituent letters	Oct 10, 2019 Amend 1 (reported as in-kind exp)
28	9/9/2019	\$30.00	ManyChat	Subscription, July-September	Oct 10, 2019 Amend 1 (reported as in-kind exp)
29	10/9/2019	\$10.00	ManyChat	Subscription	Jan 10, 2020 orig
30	11/12/2019	\$10.00	ManyChat	Subscription	Jan 10, 2020 orig
31	12/9/2019	\$10.00	ManyChat	Subscription	Jan 10, 2020 orig
32	12/31/2019	\$410.47	Red Mountain Direct	Fundraising fees	Jan 10, 2020 orig
33	3/31/2020	\$577.75	Red Mountain Direct	Transaction fees	Apr 10, 2020 Amend 1
34	5/20/2020	\$2,675.49	Red Mountain Direct	Fundraising	2020 Pre-Election orig
35	6/30/2020	\$956.50	Red Mountain Direct	Fundraising fees	Jul 10, 2020 orig
36	7/17/2020	\$10,000.00	Law Office of Brooks Fudenberg, LLC	Legal services	Oct 10, 2020 / Pre-Election orig
37	12/31/2020	\$621.45	Red Mountain Direct	Fundraising fees	Jan 10, 2021 orig

TABLE 5 -
Checks Deposited into Campaign Bank Account
> 10 Days After Receipt

TABLE 5 - Checks Deposited Into Campaign Bank Account > 10 Days After Receipt					
COUNT	POST DATE	TX DATE	DESCRIPTION	DEPOSIT	Days btwn Tx and Post
	12/22/2017	12/8/2017	Mobile check deposit	\$100.00	(14.00)
	12/22/2017	12/9/2017	Mobile check deposit	\$500.00	(13.00)
	1/8/2018	12/27/2017	Mobile check deposit	\$100.00	(12.00)
	1/8/2018	12/28/2017	Mobile check deposit	\$250.00	(11.00)
38	3/5/2018	2/12/2018	Mobile check deposit	\$1,000.00	(21.00)
	3/5/2018	2/22/2018	Mobile check deposit	\$1,000.00	(11.00)
	3/5/2018	2/22/2018	Mobile check deposit	\$1,000.00	(11.00)
	3/5/2018	2/22/2018	Mobile check deposit	\$1,000.00	(11.00)
	3/5/2018	2/22/2018	Mobile check deposit	\$1,000.00	(11.00)
	5/30/2018	5/19/2018	Mobile check deposit	\$300.00	(11.00)
	6/5/2018	5/21/2018	Mobile check deposit	\$100.00	(15.00)
	6/18/2018	6/5/2018	Mobile check deposit	\$50.00	(13.00)
39	11/26/2018	8/13/2018	Mobile check deposit	\$250.00	(105.00)
40	2/3/2020	1/6/2019	Mobile check deposit	\$140.00	(393.00)
41	5/6/2019	4/18/2019	Mobile check deposit	\$100.00	(18.00)
42	5/6/2019	4/20/2019	Mobile check deposit	\$250.00	(16.00)
43	10/8/2019	8/30/2019	Mobile check deposit	\$250.00	(39.00)
	10/31/2019	10/19/2019	Mobile check deposit	\$200.00	(12.00)
44	1/13/2020	12/16/2019	Mobile check deposit	\$50.00	(28.00)
	1/3/2020	12/19/2019	Mobile check deposit	\$1,000.00	(15.00)
	1/10/2020	12/29/2019	Mobile check deposit	\$100.00	(12.00)

TABLE 5 - Checks Deposited into Campaign Bank Account > 10 Days After Receipt					
COUNT	POST DATE	TX DATE	DESCRIPTION	DEPOSIT	Days btwn Tx and Post
	1/21/2020	1/9/2020	Mobile check deposit	\$100.00	(12.00)
45	2/3/2020	1/6/2019	Mobile check deposit	\$140.00	(28.00) for 1/6/2020
	2/3/2020	1/21/2020	Mobile check deposit	\$360.00	(13.00)
	2/3/2020	1/21/2020	Mobile check deposit	\$500.00	(13.00)
	3/2/2020	2/19/2020	Mobile check deposit	\$25.00	(12.00)
	3/30/2020	3/17/2020	Mobile check deposit	\$150.00	(13.00)
	5/15/2020	5/2/2020	Mobile check deposit	\$100.00	(13.00)
46	5/26/2020	5/10/2020	Mobile check deposit	\$25.00	(16.00)
47	6/15/2020	5/21/2020	Mobile check deposit	\$150.00	(25.00)
	6/15/2020	5/31/2020	Mobile check deposit	\$75.00	(15.00)
	6/15/2020	6/1/2020	Mobile check deposit	\$50.00	(14.00)
	6/15/2020	6/3/2020	Mobile check deposit	\$25.00	(12.00)
	6/15/2020	6/4/2020	Mobile check deposit	\$25.00	(11.00)
	7/1/2020	6/19/2020	Mobile check deposit	\$1,000.00	(12.00)
48	7/29/2020	7/1/2020	Mobile check deposit	\$35.00	(28.00)
49	8/21/2020	7/20/2020	Mobile check deposit	\$500.00	(32.00)
Table includes all checks deposited more than ten days after receipt. Respondent only charged with checks deposited more than 15 days after receipt pursuant to Section 8-13-1312.					

TABLE 6 -
Anedot Contributions Deposited
> 10 Days After Receipt

TABLE 6 - ANEDOT CONTRIBUTIONS DEPOSITED >10 DAYS AFTER RECEIPT						
COUNT	POST DATE	TX DATE	AMOUNT	RECEIPT	RECEIPT	RECEIPT
50-53	3/27/2018	3/27/2018	Anedot	\$363.07	Donald Cleveland (1/15), Noel Eckert (1/15), Robert Lynch (1/19), Robert Lynch (2/19), Joshua Finn (3/17), Robert Lynch (3/19), Eddie Grant (3/23)	4 > 10 days 4 > 15 days
54-57	5/11/2018	5/11/2018	Anedot	\$296.70	Joshua Finn (4/17), Robert Lynch (4/19), Alfred Gwardiak (4/24), William Clark (5/9)	4 > 10 days 4 > 15 days
	5/29/2018	5/29/2018	Anedot	\$57.06	William Childers (5/18), Robert Lynch (5/19)	1 > 10 days 0 > 15 days
58	7/11/2018	7/11/2018	Anedot	\$146.82	On Jul 10, 2018 orig CDR: \$125 from Joshua Finn received 6/17/18; On Oct 10, 2018 orig CDR: Robert Lynch (7/2), Rick Green (7/2), Kathy Smith 7/2), Janet Hill (7/2), Robert Lynch (7/9), Rick Green (7/9)	1 > 10 days 1 > 15 days
59-79	8/29/2018	8/29/2018	Anedot	\$356.64	Kathy Smith (7/10, 7/17, 7/24, 7/31, 8/7, 8/14, 8/21/2018); Rick Green (7/16, 7/23, 7/30, 8/6, 8/13, 8/20/2018); Robert Lynch (7/16, 7/23, 7/30, 8/6, 8/13, 8/20/2018); Janet Hill (7/13, 7/20, 7/27, 8/3, 8/10, 8/17, 8/24/2018); Joshua Finn (7/17, 8/17/2018)	24 > 10 days 21 > 15 days
80-98	10/11/2018	10/11/2018	Anedot	\$241.32	On Oct 10, 2018 CDR: Robert Lynch (8/27, 9/3, 9/10, 9/17, 9/24); Rick Green (8/27, 9/3, 9/10, 9/17, 9/24); Kathy Smith (8/28, 9/4, 9/11, 9/18, 9/25); Janet Hill (8/31, 9/7, 9/14, 9/21, 9/28) ----- On Oct 10, 2018/2018 Pre-El Amend 1 CDR: Robert Lynch (10/1, 10/8); Rick Green (10/1, 10/8); Kathy Smith (10/2, 10/9); Janet Hill (10/5)	20 > 10 days 19 > 15 days
99-104	11/6/2018	11/6/2018	Anedot	\$178.32	On Oct 10, 2018/Pre El Amend 1 CDR: Janet Hill (10/12), Robert Lynch (10/15), Rick Green (10/15), Kathy Smith (10/16), Joshua Finn (10/17) ----- On Jan 10, 2019 CDR: Janet Hill (10/19, 10/26, 11/2/2018); Robert Lynch (10/22, 10/29); Rick Green (10/22, 10/29); Kathy Smith (10/23, 10/30)	10 > 10 days 6 > 15 days

COUNTY						
						64 total > 10 days
						55 total > 15 days
<p>Table includes all checks deposited more than ten days after receipt. Respondent only charged with checks deposited more than 15 days after receipt pursuant to Section 8-13-1312.</p>						

Table 6 - Anedot contributions deposited >10 days after receipt

TABLE 7 -
Rally Contributions Exceeding \$100
Not Reported on CDR

TABLE 7 - 10-19-2020

EVENT	DATE	AMOUNT	PERSONNEL
105	7/6/2020	\$120.00	Nelson Waller
106	7/17/2020	\$500.00	Robert Henderson
107	7/27/2020	\$180.00	Sheila Gerke
108	7/31/2020	\$240.00	Robert Henderson

TABLE 8 -

Cash Deposits into Campaign Bank Account

109	4/18/2019	4/18/2019	Deposit	\$50.00	SunTrust Bank Deposit slip shows a \$50.00 cash deposit at 12:31 pm
110	7/11/2019	7/9/2019	Deposit	\$80.00	SunTrust Bank Deposit slip shows transaction at 9:09 am as a \$50.00 cash deposit and a \$30.00 check #114 from Eva Lois Long dated 7/9/2019 - \$50.00 contribution from Ann Dunham reported as received 7/9/2019
111	11/5/2019	11/5/2019	Deposit	\$200.00	SunTrust Bank Deposit slip shows this was a deposit of \$200.00 cash occurring at 2:39 pm - \$200 contribution from Bill Bledsoe reported as received 10/18/2019
112	5/14/2020	5/14/2020	Deposit	\$50.00	SunTrust Bank Deposit slip shows this was a deposit of \$50.00 cash occurring at 11:14 am - \$50.00 contribution from Bob Martin reported as received 5/14/2020
	5/22/2020	5/22/2020	Deposit	\$50.00	SunTrust Bank Deposit slip shows a deposit of \$50.00 cash at 10:20 am - \$20.00 from Amanda Hill, \$20.00 from Dave Duckett, \$10.00 from Maurice & Sharon Hastings reported as received 5/20/2020
113	5/27/2020	5/27/2020	Deposit	\$35.00	SunTrust Bank Deposit slip shows a deposit of \$35.00 cash at 1:53 pm - \$25.00 from Richard Faye reported as received 5/22/2020, \$10.00 from Brenda Floyd reported as received 5/26/2020
114	6/2/2020	6/2/2020	Deposit	\$100.00	SunTrust Bank Deposit slip shows a deposit of \$100.00 cash at 11:04 am with Transaction ID 51 - \$100.00 contribution from Charles F. Hendrix, Jr reported as received 5/31/2020
115	6/2/2020	6/2/2020	Deposit	\$100.00	SunTrust Bank Deposit slip shows a deposit of \$100.00 cash at 11:04 am with Transaction ID 53


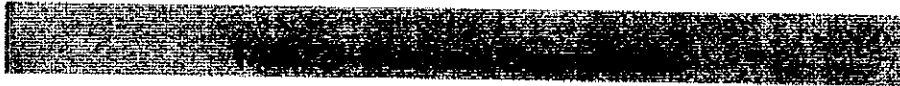
						
116	6/2/2020	6/2/2020	Deposit	\$100.00		SunTrust Bank Deposit slip shows a deposit of \$100.00 cash at 11:04 am with Transaction ID 55
117-119	6/30/2020	6/30/2020	Deposit	\$300.00		SunTrust Bank Deposit slip shows a deposit of \$300.00 cash at 1:23 pm - \$200.00 from Sarah Ledford, \$60.00 from David Blizzard, \$40.00 from Scot Kaufman reported as received 6/30/2020
120	10/7/2020	10/7/2020	Deposit	\$50.00		SunTrust Bank Deposit slip shows a deposit of \$50.00 cash at 11:12 am - A \$50.00 contribution from Valerie Wade on 10/7/2020 reported on Oct 10, 2020 / Pre-EI Amend 1 CDR
121-122	10/26/2020	10/26/2020	Deposit	\$70.00		SunTrust Bank Deposit slip shows a deposit of \$70.00 cash at 2:39 pm - A \$20.00 contribution from Susanne Vick and a \$50.00 contribution from Lisa Simpson reported on Jan 10, 2021 orig CDR

TABLE 9 -
Personal Expenditures



LINE	DATE	AMOUNT	DESCRIPTION
129	5/29/2018	\$14.95	Audible - check card purchase
130	6/29/2018	\$14.95	Audible - check card purchase
131	7/2/2018	\$1,186.83	Mobile App Mtg Payment to [REDACTED]

TABLE 10 -
Contributions Deposited into Campaign Bank
Account but not Initially Reported on CDR

TABLE 10 - Contributions Deposited into Campaign Bank Account but not Initially Reported on GDR

POST DATE	EX DATE	DESCRIPTION	DEPOSIT
11/18/2019	11/12/2019	Mobile check deposit	\$50.00
1/14/2020	1/14/2020	Amedot	\$91.70
3/16/2020	3/16/2020	Mobile App Transfer From: [REDACTED]	\$19.99
5/7/2020	5/7/2020	Online Banking Transfer from: [REDACTED]	\$20.00
9/11/2020	9/11/2020	Deposit	\$30.00
12/29/2020	12/29/2020	Mobile App Transfer From [REDACTED]	\$20.00