



Rikard & Protopapas, LLC

Attorneys and Counselors at Law

ROBERT G. RIKARD
rgr@rplegalgroup.com

PETER D. PROTOPAPAS
pdp@rplegalgroup.com

ALLYSON C. RIKARD
acarbaugh@rplegalgroup.com

CHARLES E. USRY
cusry@rplegalgroup.com

P. JASON REYNOLDS
pjr@rplegalgroup.com

1329 Blanding Street
Columbia, SC 29201

Post Office Box 5640
Columbia, SC 29250

tel: 803.978.6111
fax: 803.978.6112
web: rplegalgroup.com

August 8, 2016

Luke A. Rankin, Chairman
Senate Ethics Committee
The Senate of South Carolina
Post Office Box 142
Columbia, South Carolina 29202

Re: On behalf of Senator Raymond Cleary, III, the undersigned responds as follows to the July 7, 2016 Sworn Complaint issued by the Senate Ethics Committee:

Dear Mr. Rankin:

Please accept this letter as a response to the July 7, 2016 complaint issued by the Senate Ethics Commission. Please advise if you require anything further from Senator Cleary at this time.

1) As an initial response, Sen. Cleary will fully cooperate in this investigation; will proceed with an audit; will fully disclose its results; and, will correct any errors in his previous filings.

2) With regard to allegation one, Sen. Cleary denies making knowing and willful false amendments or statements. It does appear based on our very early investigation that there are factual errors in the Amended Report for January 10, 2015, which was filed on February 14, 2015. The \$7900.00 reimbursement listed on that Amended Report was in fact made on August 12, 2015, and erroneously made in the amount of \$7500.00 rather than \$7900.00. Sen. Cleary will proceed with a complete audit of his campaign accounts, and as soon as that audit is complete, any necessary amendments will be made to Disclosure Reports, and this response will be updated. Towards that end, Sen. Cleary has amended the February 14, 2015 Report to delete the incorrect entry,

amended the October 10, 2015 Report which accurately reflects the \$7500 deposited on August 12, 2015, and deposited an additional \$400 on Monday, August 8, 2016.

3) With regard to allegation two, as of the present time, Sen. Cleary denies misrepresenting payees or amounts of expenditures. However, Sen. Cleary will proceed with a complete audit of his campaign accounts and as soon as that audit is complete, any necessary amendments will be made to Disclosure Reports, and this response will be updated.

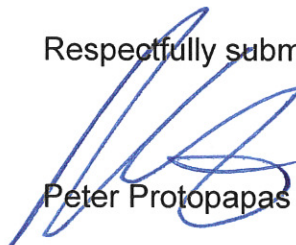
4) With regard to allegation three, Sen. Cleary denies using campaign funds for personal expenses. However, Sen. Cleary will proceed with a complete audit of his campaign accounts and as soon as that audit is complete, any necessary amendments will be made to Disclosure Reports, and this response will be updated.

5) With regard to allegation four, as of the present time, Sen. Cleary denies failing to report contributions. . However, Sen. Cleary will proceed with a complete audit of his campaign accounts and as soon as that audit is complete, any necessary amendments will be made to Disclosure Reports, and this response will be updated.

6) With regard to allegation five, as of the present time, Sen. Cleary denies failing to report expenditures. . However, Sen. Cleary will proceed with a complete audit of his campaign accounts and as soon as that audit is complete, any necessary amendments will be made to Disclosure Reports, and this response will be updated.

Having fully responded to the Complaint, Sen. Cleary reiterates that he understands the concerns of the Committee, will work cooperatively to ensure complete answers to the Committee's questions, and will take all necessary corrective actions.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Peter Protopapas', is written over the typed name.

Peter Protopapas

Cc: Deborah Barbier
William McKinnon
Montrio M Belton