

J. David Weeks
Vice-Chairman

Paula Rawl Calhoon
Neal A. Collins
Val Guest

Lauren G. Trask
Chief Legal Counsel

Maggie Chappell
Assistant Legal Counsel

House Legislative Ethics Committee



P.O. BOX 11867
519 BLATT BUILDING
COLUMBIA, SC 29211
TELEPHONE: (803) 734-3114
FAX: 803-734-8795

Beth E. Bernstein
Secretary

John Richard C. King
Robert Robbins
J. Todd Rutherford
Leonidas E. “Leon” Stavrinakis

Grace Ross
Executive Assistant

HOUSE ETHICS COMMITTEE NOVEMBER 14, 2025 ADVISORY OPINION In the Matter of Adam Morgan COMPLAINT NO. C2024-075

Complainant: William R. Timmons, IV
Address: P.O. Box 3416
Greenville, SC 29602
Telephone: 864-241-0175

Respondent: Adam Morgan
Address: 803 Ikes Road
Taylors, SC 29687
Telephone Number: 803-212-6795

This is in response to the State Ethics Commission’s (herein “SEC”) Recommendations and Investigative Reports (herein “Report”) dated May 19, 2025 and September 23, 2025. The House Legislative Ethics Committee (herein “Committee”) met on Wednesday, November 5, 2025 and issued the following advisory opinion pursuant to S.C. Code Section 8-13-540.

BACKGROUND

On September 18, 2024, a Complaint was filed against South Carolina House of Representatives Member Adam Morgan. The Complaint alleged several allegations, including Respondent’s use of campaign funds, campaign endorsing, failing to report in-kind contributions, and failing to report other required reporting details. The SEC carried out a thorough investigation, and a review of the Respondent’s campaign disclosure reports, campaign bank records, and campaign consulting invoices did reveal evidence to support offenses. Upon their initial review of the SEC’s Recommendations and Investigative Report, the Committee decided to request additional investigation into the evidence provided. After additional investigation, the SEC recommended, per the original recommendation and upon additional investigation, that the Committee find probable cause is present and charge Respondent with four counts of Ethics Act violations: one (1) count of violating one §8-13-1120(A)(10) for failing to report spousal income on the 2024 Statement of Economic Interests; one (1) count of violating §8-13-1314 for accepting an in-kind contribution in excess of \$1,000 for the “Farewell Mailer” valued at \$3,989.82 from Ivory Tusk without rendering payment; one (1) count of violating §8-13-1340(A) for making an independent expenditure to Stephen Frank for advocating for the election of Stephen Frank on the “Farewell Mailer”; and one (1) count of violating §8-13-1308 for accepting an in-kind contribution valued at \$737.20 for “Birthday Mailer” from Ivory Tusk without rendering payment.

FINDINGS

Upon review of the SEC's recommendation and relevant evidence, the Committee makes the following findings:

1. S.C. Code § 8-13-1120(A)(10)

S.C. Code Ann. Section 8-13-1120(A)(10) provides that a statement of economic interests report must contain full and complete information regarding "a listing of the private source and type of any income received in the previous year by the filer or a member of his immediate family." There are certain items not included within this requirement, including income received pursuant to a court order, income received via a savings, checking, or brokerage account with a bank, savings and loan, or other licensed financial institution, and income received from a mutual fund.

A review of Respondent's Statement of Economic Interests Reports identified that upon the original filing of Respondent's 2024 Statement of Economic Interests Report, Respondent failed to disclose his spouse's private income.

Thus, the Committee finds probable cause is present and charges Respondent with one count of a violation of § 8-13-1120(A)(10) for failing to report his spouse's income. However, the Committee notes that Respondent has corrected this error by amending his 2024 Statement of Economic Interests Report.

2. S.C. Code § 8-13-1314

S.C. Code Ann. Section 8-13-1314 provides that within an election cycle, a candidate shall not accept a contribution which exceeds one thousand dollars for any office (other than a statewide office).

A review of Respondent's campaign bank records, campaign disclosure reports, and campaign records (i.e. invoices discovered over the course of the investigation) revealed that Respondent failed to identify on his campaign disclosure report an in-kind campaign contribution, which exceeded the \$1,000.00 contribution limit and was not reported. Further, there is no evidence that any money from Respondent's campaign bank account was expended in relation to this instance, resulting in an in-kind contribution in excess of the contribution limitation.

Therefore, the Committee finds probable cause is present and charges Respondent with one count of violation of § 8-13-1314 for accepting an in-kind contribution in excess of \$1,000 without rendering payment.

3. S.C. Code § 8-13-1340(A)

S.C. Code Ann. Section 8-13-1340(A) provides that "a candidate or public official shall not make a contribution to another candidate or make an independent expenditure on behalf of another candidate or public official from the candidate's or public official's campaign account or

through a committee, except legislative caucus committees, directly or indirectly established, financed, maintained, or controlled by the candidate or public official.” An independent expenditure within the SC Ethics Act is defined as “an expenditure made directly or indirectly by a person to advocate the election or defeat of a clearly identified candidate...and when taken as a whole and in context, the expenditure made by a person to influence the outcome of an elective office but which is not made to, controlled by, coordinated with, requested by, or made upon consultation with a candidate or an agent of a candidate.”

Upon reviewing the Respondent’s records and the “Farewell Mailer” in question, an endorsement of Stephen Frank, advocating for his election, is evident on the mailer. This endorsement falls within the definition of an independent expenditure on behalf of another candidate and would have been an impermissible expenditure made from Respondent’s campaign bank account, as the mailers in question were produced for Respondent (and have been identified as an in-kind contribution in excess of \$1,000).

Thus, the Committee finds probable cause is present and charges Respondent with one (1) count of violation of §8-13-1340(A) for making an independent expenditure to Stephen Frank advocating for the election of Stephen Frank in a “Farewell Mailer”.

4. S.C. Code §8-13-1308

S.C. Code Ann. Section 8-13-1308 provides for the required filing of certified campaign disclosure reports, specifically requiring that specific details of campaign contributions and expenditures must contain “(1) the total 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.”

A review of Respondent’s campaign records and filings revealed that Respondent failed to identify on his campaign disclosure report the in-kind contribution of \$737.20 for a “Birthday Mailer” done for Respondent. After reviewing Respondent’s campaign records, no payment was rendered for this invoiced product.

Therefore, the Committee finds probable cause is present and charges Respondent with one (1) count of a violation of § 8-13-1308 for failing to disclose an in-kind contribution.

CONCLUSION

Accordingly, the Committee hereby **CONCURS** with the SEC’s recommendations and finds probable cause is present to charge Respondent with one (1) count of violating §8-13-1120(A)(10) for failing to report spousal income on the 2024 Statement of Economic Interests Report; one (1) count of violating §8-13-1314 for accepting an in-kind contribution in excess of \$1,000 without rendering payment; one (1) count of violating §8-13-1340(A) for making an independent expenditure to Stephen Frank; and one (1) count of violating §8-13-1308 for accepting

an in-kind contribution without rendering payment. Further, the Committee finds that one of the four counts falls under the purview of S.C. Code Section 8-13-1170.

The Committee **ORDERS** that Respondent must pay the remainder of the campaign funds in his South Carolina House of Representatives campaign bank account to the Children's Trust of South Carolina.

Additionally, the Committee **ORDERS** Respondent to amend his campaign disclosure reports to identify the in-kind contributions and expenditures identified through this Complaint within thirty (30) days of the date of this Advisory Opinion. Furthermore, Respondent must file a final campaign disclosure report within thirty (30) days of the date of this Advisory Opinion.

Finally, the Committee **ADMONISHES** that it was impermissible to make an independent expenditure under §8-13-1340(A).

AND IT IS SO ORDERED, this 14th day of November, 2025, 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. Paula Rawl Calhoun



Rep. Neal A. Collins

Rep. Thomas Duval "Val" Guest, Jr.



Rep. John Richard C. King

Rep. Robby Robbins



Rep. J. Todd Rutherford

Rep. Leonidas E. "Leon" Stavrinakis



STATE OF SOUTH CAROLINA
STATE ETHICS COMMISSION

COMPLAINT FORM

FOR COMMISSION USE ONLY:

CASE NUMBER

c 2024-075

COMPLAINANT: William R. Timmons IV
ADDRESS: PO Box 3416, Greenville, SC 29602
TELEPHONE NUMBER: (864) 241-0175
TITLE: Member of Congress

RESPONDENT: Adam Morgan
ADDRESS: 803 Ikes Road, Taylors, SC 29687
TELEPHONE NUMBER: (803) 212 - 6795
TITLE: SC House Member/Candidate

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 Complaint against South Carolina House member Adam Morgan.

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 South Carolina / Greenville

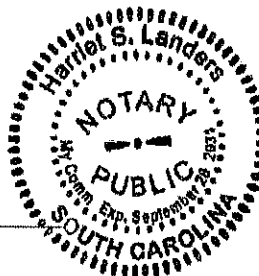
Personally appeared before me William R. Timmons IV who, first being duly sworn, says that he/she has read and knows the contents of the above complaint and that the allegations contained therein, are true and correct to the best of his/her own knowledge, except for those matters therein based upon information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

Sworn to and subscribed before me this
16 day of September, 2024

Harriet S. Landers

Notary Public for South Carolina

My Commission expires 9/28/25



William R. Timmons IV

Complainant Signature

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

STATE OF SOUTH CAROLINA
COUNTY OF LEXINGTON

) IN THE SOUTH CAROLINA STATE
) ETHICS COMMISSION
)

For the reasons below, I file this Complaint against South Carolina State Representative Adam Morgan (Morgan) and request the South Carolina State Ethics Commission (Ethics Commission) investigate Morgan for violations of multiple provisions of the State Ethics, Government Accountability, and Campaign Reform Act of 1991, S.C. Code Ann. § 8-13-100, *et. seq.* (Ethics Act), including violations of § 8-13-1348(A) (using campaign funds for purposes unrelated to the campaign or the office), § 8-13-1322(A) (excessive contributions to a legislative caucus committee), § 8-13-1340 (*per se* impermissible contribution from campaign funds to another candidate), § 8-13-1314(A)(1)(c) (excessive contribution to other candidates), § 8-13-1308(F) (failure to properly detail campaign expenditures), and § 8-13-1120(A)(10) (failure to include all private income on Statements of Economic Interests).

PARTIES AND JURISDICTION

1. I am a resident of Greenville County, South Carolina and currently serve in the United States House of Representatives, representing South Carolina's Fourth Congressional District (SC-04).

2. Respondent Adam Morgan (Morgan) is, and at all relevant times was, a member of the South Carolina House of Representatives (House), representing House District 20. Morgan was first elected to the House in 2018, he assumed office in or around November 2018, and he has served continuously ever since.

3. Since March 2015 and continuing to the present, Morgan has filed quarterly and other required Campaign Disclosure Reports (CDRs) in the Ethics Commission's Public Disclosure and Accountability Reporting System, certifying what Morgan represents to accurately reflect his campaign's contributions and expenditures. *See* S.C. Code Ann. § 8-13-1308.

4. At all relevant times, Morgan was a "candidate" as defined by S.C. Code Ann. § 8-13-1300(4) of the Ethics Act, as well as a "public official" as defined by § 8-13-100(27) and § 8-13-1300(28).

5. The South Carolina House of Representatives Ethics Committee (House Ethics Committee) is the "appropriate supervisory office" over Morgan's conduct pursuant to S.C. Code Ann. § 8-13-100(2)(c).

6. The Ethics Commission has jurisdiction to investigate this Complaint, pursuant to S.C. Code Ann. § 8-13-320(9) and § 8-13-540.

7. At all relevant times, Morgan was a member of and the chairman of the South Carolina Freedom Caucus (SC Freedom Caucus). As the result of a recent federal lawsuit, the SC Freedom Caucus is a "legislative caucus committee," as defined in S.C. Code Ann. § 2-17-10(21) and § 8-13-1300(21), rather than a "legislative special interest caucus." *See S.C. Freedom Caucus v. Jordan*, 677 F. Supp. 3d 352 (D.S.C. 2023); House Ethics Committee Advisory Opinion 2023-3 (Sept. 19, 2023) (HEC Opinion 2023-3).

FACTS UNDERLYING ETHICS ACT VIOLATIONS

October 2023 expenditures from Morgan's state campaign funds

8. On November 16, 2023, Morgan first publicly announced that he would not be seeking re-election to the House and instead would campaign against me for the Republican nomination for SC-04. That day, he filed a Statement of Organization for his principal federal campaign committee, Adam Morgan for Congress, with the FEC.

9. In his Fourth Quarter CDR, filed with the Ethics Commission on January 13, 2024 and covering the October 1, 2023 through December 31, 2023 reporting period, Morgan certified that his state campaign made several expenditures, including the following:

Date	Paid To	Amount	Mailing Address	Description
Oct 30, 2023	Innovative Communication Strategies	\$5,995.00	143 Forest Lake Dr. Simpsonville, SC 29681	Tele Town Hall
Oct 16, 2023	Ivory Tusk Consulting	\$7,514.40	PO Box 85924 Lexington, SC 29075	Townhall Matter

10. Innovative Communication Strategies (ICS) is a political consulting firm owned and run by Jon Parker.

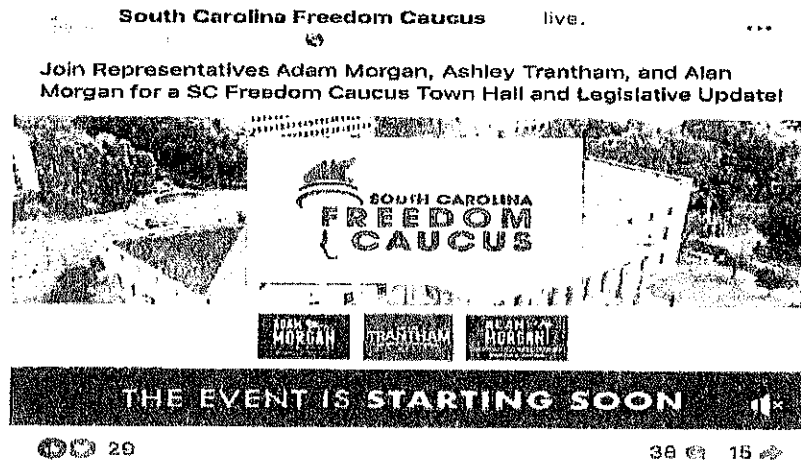
11. Ivory Tusk Consulting (Ivory Tusk), a political consulting firm owned and run by R.J. May. May is also a member of the South Carolina House and is the Vice Chair of the SC Freedom Caucus.

12. On October 19, 2023, the SC Freedom Caucus held a "Telephone Town Hall and Legislative Update" (Telephone Town Hall) in which Morgan, and two other State House and Freedom Caucus members, Ashley Trantham and Alan Morgan (Adam's brother), participated.¹ Although Morgan represented in his CDRs that his campaign paid for the Telephone Town Hall,² it was promoted by the SC Freedom Caucus as one of its own events, not a campaign event for Morgan, his brother, or Trantham. *See, e.g.,* Telephone Town Hall Live Stream at <https://www.facebook.com/share/v/74nAyhASFKEbwMm6/> at 00:05:15 - 00:05:20 (Morgan noting in his opening comments that "[w]e've never actually done this before. It's a Freedom

¹ Because my campaign was aware that Morgan might be running against me in October 2023, we were monitoring his activities and know of no other Telephone Town Hall or similar event involving Morgan around the timeframe of these expenditures.

² The SC Freedom Caucus did not report any contributions or expenditures connected with the Telephone Town Hall its 2023 Fourth Quarter CDR, but only reported receiving \$189.37 in contributions and making \$9.37 in expenditures during the October 1, 2023 through December 31, 2023 reporting period. Neither Trantham nor Alan Morgan reported contributions or expenditures connected with the Telephone Town Hall on either of their 2023 Fourth Quarter CDRs.

Caucus event.”) (accessed August 30, 2024); Telephone Town Hall Mailer attached as Exhibit A; October 19, 2023 SC Freedom Caucus Facebook post:



13. As recently confirmed by the House Ethics Committee in HEC Opinion 2023-3, the SC Freedom Caucus is subject to the \$3,500 calendar year contribution limits in § 8-13-1322(A) because it is a “legislative caucus committee.” Thus, if Morgan accurately reported these expenditures and they were attributable to the SC Freedom Caucus Telephone Town Hall, then both Morgan and the Freedom Caucus have apparently violated § 8-13-1322(A). *See* § 8-13-1322(A) (“A person may not contribute to a committee and a committee may not accept from a person contributions aggregating more than [\$3,500] in a calendar year.”); § 8-13-1300(6) (defining “committee” to include a “legislative caucus committee”); § 8-13-1300(7) (defining “contribution” to include an “in-kind contribution or expenditure ... made to a candidate *or* committee to influence an election; or payment or compensation for the personal service of another person which is rendered for any purpose to a candidate *or* committee without charge, whether any of the above are made or offered directly or indirectly.”) (emphasis added); § 8-13-1300(20) (defining “[i]n-kind contribution or expenditure” as “goods or services which are provided to or by a person at no charge or for less than their fair market value.”).³

14. If Morgan reported the expenditures on his CDRs accurately, and they are for the Telephone Town Hall, Morgan’s problem on this issue is mostly with § 8-13-1322(A). However, I believe the Ethics Commission should also investigate whether and to what extent these two October 2023 expenditures (and especially the one to ICS) were diverted to his Congressional campaign.

15. I believe Morgan’s reported expenditure of \$7,514.40 to Ivory Tusk was at least partially accurate. \$7,514.40 seems like a high price for mailers to promote a Telephone Town

³ In HEC Opinion 2023-3, the House Ethics Committee also confirmed that the SC Freedom Caucus is required to maintain records under § 8-13-1302 and file CDRs detailing all contributions and expenditures of more than \$500 under § 8-13-1308(G), which it apparently is not doing correctly.

Hall event for three State House members, but not an impossible price depending on how many mailers were sent out to promote the event.

16. However, the \$5,995 Morgan certified to have paid ICS seems like an impossibly high price to pay anyone for a telephone town hall, especially when Morgan is also apparently claiming to have paid Ivory Tusk \$7,514.40 to promote the event. In my time campaigning for Congress and for State Senate before that, I have been involved in telephone town halls like this one and have a good idea of how they work and what they should cost. In CD-04, I represent over 750,000 people and pay significantly less than \$5,995 for telephone town halls. Because only three State House Members were involved in the Telephone Town Hall at issue, this should have been designed to reach approximately 120,000 constituents and I believe should have cost a maximum of \$1,500 to produce.

17. On information and belief, based in part on the Federal Communications Commission (FCC) Political File website,⁴ all or part of the \$5,995 paid to Parker/ICS from state campaign funds was used to produce and purchase airtime for a negative radio advertisement which aired on WYRD-FM on December 13, 2023 against Congressman Jeff Duncan and myself (Timmons/Duncan radio ad).

18. Ostensibly, the Timmons/Duncan radio ad was requested by an organization called "Restore Our Values PAC" (Restore Our Values) which was incorporated in South Carolina on December 6, 2023. *See* <https://businessfilings.sc.gov/BusinessFiling/Entity/Profile/23601e0a-cf52-4a8e-855f-1e090d92fc19> (accessed August 30, 2024). On December 4, 2023, Parker in his capacity at ICS personally filled out what is commonly known as an NAB Form⁵ to request airtime on WYRD for the Timmons/Duncan radio ad. *See Exhibit B.*

19. My campaign obtained the December 4, 2023 Parker/ICS airtime request from the FCC website on or about December 12, 2023. However, this document is not currently available on the FCC website. The website does show that an NAB form for Restore Our Values was "removed on 12/13/2023 due to incorrect information." *See Exhibit C.* In the place of the Parker/ICS airtime request is a Timmons/Duncan radio ad request filed on December 11, 2023 in the name of Sean Wise, also ostensibly on behalf of Restore Our Values. *See Exhibit D.*

20. On information and belief, Parker realized that he made a mistake in personally requesting the airtime for the Timmons/Duncan radio ad because he wanted to conceal his and ICS' connection to Restore Our Values and the ad, so a new NAB form was sent ostensibly sent by Wise.

⁴ *See* <https://publicfiles.fcc.gov/fm-profile/WYRD-FM/political-files/2023/non-candidate-issue-ads/restore-our-values/a5b7cce0-a93f-9d5a-8612-55ff0ad2463d> (accessed August 30, 2024); *see also* <https://publicfiles.fcc.gov/about> (accessed August 30, 2024).

⁵ This is a National Association of Broadcasters Political Broadcast Agreement Form for Candidate Advertisements. *See* <https://www.nab.org/xert/2023Bmails/PublicAffairs/amRadioPB19.pdf> (accessed August 30, 2024).

21. The total cost of the Timmons/Duncan radio ad purchase was \$2,096. See Exhibit E.

22. The Timmons/Duncan radio ad was also the subject of a December 18, 2023 *Greenville News* article in which Morgan was questioned about his involvement in the ad, and was quoted as follows:

Morgan said Timmons' campaign was attempting to shift the conversation from the congressman's "scandal-scarred tenure in Washington" and that it was a sign of politicians willing to do or say anything to stay in office. "There is no connection between my campaign and the ad, and he knows it," Morgan said.⁶

23. For the above reasons, I believe there are good grounds to investigate whether some or all of the \$5,995 paid by Morgan's state campaign account was not used for the purposes certified on his Fourth Quarter 2023 CDR, but converted to use for his Congressional campaign, including the production and purchase of airtime for the Timmons/Duncan radio ad. This belief is based in part on the unusually high cost reported for the Telephone Town Hall described above, but also on close timing of the ICS expenditure to the onset of Morgan's Congressional campaign, and the fact that Parker made the ad buy for the Timmons/Duncan radio ad and then apparently acted to obscure his involvement.

24. At the time of this Complaint, Restore Our Values has not made any required FEC disclosures reporting the true source of the funds for the ad, and Morgan for Congress has not reported any expenditure to Parker or ICS whatsoever.

25. S.C. Code Ann. § 8-13-1348(A) provides in part that "[n]o candidate ... 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." In short, Morgan's conversion of state campaign funds to use for his Congressional campaign is not permitted under the Ethics Act. See HEC Advisory Opinion 2018-7 (June 20, 2018) (explaining that a candidate under its jurisdiction "may not use his or her campaign funds to contribute to a candidate for Federal office," which would violate § 8-13-1348(A) and implicate many issues under federal campaign finance law.).

26. If Morgan failed to properly detail the specific purposes of his campaign expenditures on the Fourth Quarter 2023 CDR, certifying the reports incorrectly would also violate S.C. Code Ann. § 8-13-1308(F).

⁶ See <http://www.greenvilleonline.com/story/news/2023/12/18/new-ad-for-eth-duncan-timmons-over-indebted-campaigns/192504760/> (accessed August 29, 2024).

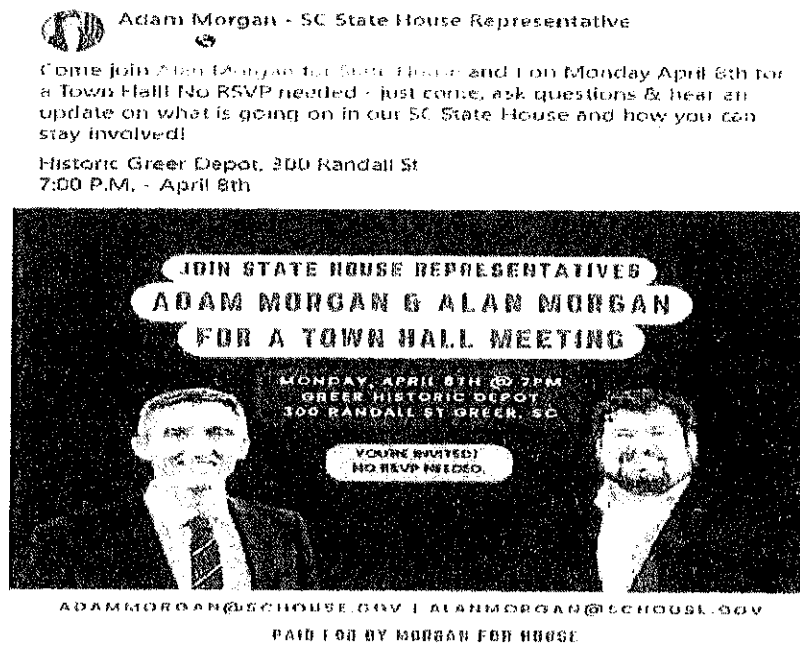
April 8, 2024 Town Hall with Alan Morgan

27. Morgan's brother, Alan Morgan is also a House member, representing House District 18.

28. At all relevant times, Alan Morgan was a "candidate" as defined by S.C. Code Ann. § 8-13-1300(4) of the Ethics Act, as is true for Adam Morgan.

29. On April 8, 2024, Adam and Alan Morgan held a joint Town Hall at the Historic Greer Depot located on 300 Randall Street, Greer, SC, which is located in Alan Morgan's House District. This Town Hall in Greer was not promoted as a Freedom Caucus event, but on information and belief, it was primarily intended to benefit Alan Morgan's campaign for reelection to the State House.

30. Adam Morgan promoted this event on his Facebook page, as shown below:



31. On his 2024 First Quarter CDR, Adam Morgan reported the following expenditure, which is on information and belief attributable to this event:

Date	Paid To	Amount	Mailing Address	Description
Mar 28, 2024	Historic Greer Depot	\$2,040.40	300 Randall St Suite D Greer, SC 29651	Venue for Town Hall

32. On his 2024 Second Quarter CDR, Adam Morgan disclosed the following expenditures, which were on information and belief attributable to this event:

Date	Paid To	Amount	Mailing Address	Description
Apr 08, 2024	Dollar Tree	\$6.62	3025 Wade Hampton Blvd Taylors, SC 29687	Decor for Town Hall
Apr 08, 2024	Lowe's	\$12.72	850 E Suber Rd #200 Greer, SC 29630	Decor for Town Hall

33. On information and belief, the "Morgan for House" disclaimer on the advertisement above was intended to show that Adam Morgan for House paid for the communication. Alan Morgan's CDRs show do not disclose him paying anything for this Town Hall event.⁷

34. Adam Morgan cannot use his state campaign funds to benefit another candidate's campaign, whether or not that other candidate is his brother. *See* S.C. Code Ann. § 8-13-1340 ("a candidate or public official shall not make a contribution to another candidate or make an independent expenditure on behalf of another candidate or public official from the candidate's or public official's campaign account."); § 8-13-1300(7) (defining "contribution" to include an "in-kind contribution or expenditure ... made to a *candidate* or committee to influence an election; or payment or compensation for the personal service of another person which is rendered for any purpose to a *candidate* or committee without charge, whether any of the above are made or offered directly or indirectly.") (emphasis added); § 8-13-1300(20) (defining "[i]n-kind contribution or expenditure" as "goods or services which are provided to or by a person at no charge or for less than their fair market value.").

35. Also, the Morgan brothers were clearly coordinating this joint appearance, and the value of the event is more than \$1,000. Thus, Morgan's already illegal contribution of \$2,040.40 for the event venue also is an excessive contribution, attributable to Adam Morgan for providing it and Alan Morgan for accepting it. *See* § 8-13-1314(A)(1)(c).

June 8, 2024 mailer

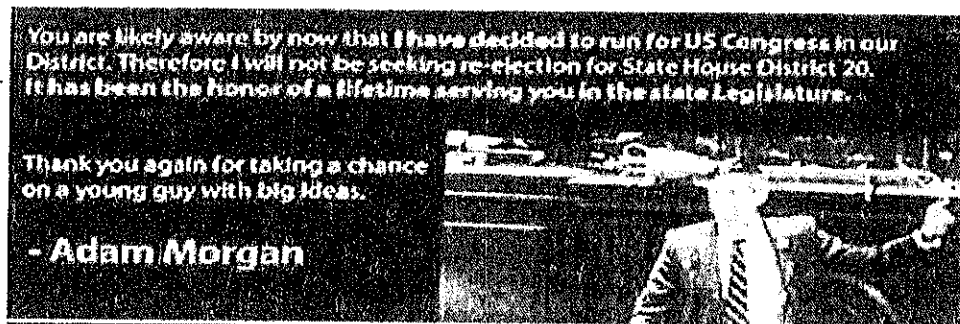
36. Because Morgan was running for Congress, he did not seek reelection to the State House. The candidates running for Republican nomination for SC House District 20 were Stephen Frank (Frank) and Sarah Curran.

37. At all relevant times, Frank was a "candidate" as defined by S.C. Code Ann. § 8-13-1300(4) of the Ethics Act.

38. On June 8, 2024, three days before the June 11, 2024, primary election for both SC-04 and SC House District 20, Morgan caused a Mailer to be sent to voters who reside in SC House

⁷ Additionally, because Alan Morgan did not disclose these in-kind contribution from Adam, Alan appears to have violated § 8-13-1308(F) by failing to properly detail the expenditures on his CDR.

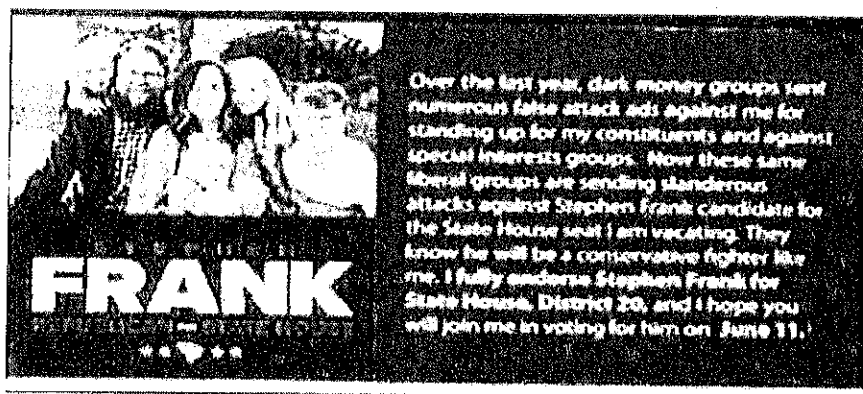
District 20 and who also reside in SC-04 (Mailer). A disclaimer on the Mailer stated it was "PAID FOR BY ADAM MORGAN FOR STATE HOUSE," and also stated among other things:



The Frank Mailer is attached as Exhibit F.

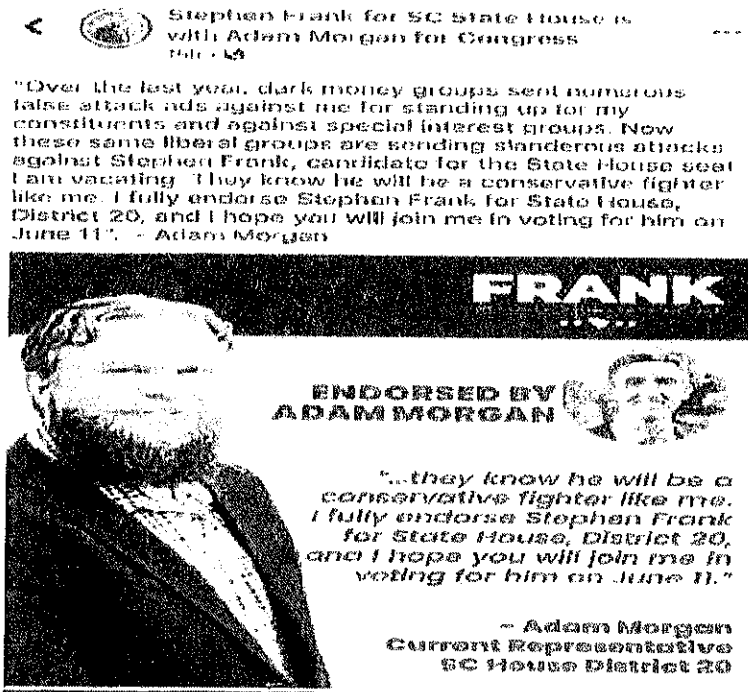
39. For reasons more fully discussed above, S.C. Code Ann. § 8-13-1348(A) prohibits Morgan from spending state campaign funds to further his own Congressional campaign. *See* HEC Opinion 2018-7.

40. The Mailer also contains Morgan's endorsement of Frank:



41. As discussed above, Morgan cannot use his state campaign funds to benefit another candidate's campaign. *See* S.C. Code Ann. § 8-13-1340; 8-13-1300(7); § 8-13-1300(20) (defining "[i]n-kind contribution or expenditure" as "goods or services which are provided to or by a person at no charge or for less than their fair market value.").

42. The same day of the Mailer the Frank for State House and Morgan for Congress campaign Facebook accounts jointly posted the exact same endorsement language that was in the Mailer:



43. Morgan and Frank appear to be coordinating on the Mailer and, on information and belief, its value is more than \$1,000. Thus, Morgan's already illegal contribution also is an excessive contribution, attributable to both Morgan for providing it and Frank for accepting it. *See* S.C. Code Ann. § 8-13-1314(A)(1)(c).

44. Neither Morgan nor Frank disclosed this expenditure and in-kind contribution for the Mailer. Thus, Morgan has also violated S.C. Code Ann. § 8-13-1308(F) by failing to properly detail the expenditure on his CDR.⁸

Expenditures from Morgan campaign to Majesty Music, Alan Morgan, and Key Element Studios

45. Ethics Commission Advisory Opinion SEC AO 2017-002 (July 20, 2016) concerned whether campaign expenditures to a candidate's own business, a family business, or a family member were unlawful under S.C. Code Ann. § 8-13-1348. While finding that this practice was not *per se* prohibited, the Ethics Commission issued guidelines on the factors for determining whether such expenditures were permissible. Among other requirements, the expenditures must be bona fide, fair market value be paid, and documentation on these expenditures be maintained.

⁸ To date, Frank has not filed a 2024 Second Quarter CDR. Frank has also violated § 8-13-1308(F) and also § 8-13-1308(D) by failing to file the CDR when due.

46. According to Morgan's annual Statements of Economic Interest (SEI) and other publicly available information, Morgan is the owner of Majesty Music, Inc. (Majesty Music). On information and belief, Majesty Music is not in the business of running political campaigns.⁹

47. The Ethics Commission website shows that Morgan's campaign made \$8,811.399 in expenditures to Majesty Music for campaign-related work.

09/24/2020	\$2,044.43	Campaign Mailer
06/28/2018	\$6,766.96	Matters and postage

48. As noted above, Alan Morgan is Adam Morgan's brother. The Ethics Commission website shows that Adam Morgan's campaign made campaign has made \$1,500 in expenditures to Alan Morgan for "Campaign Consulting" services:

09/23/2020	\$500.00	Campaign Consulting
06/21/2018	\$1,000.00	Campaign Consulting

49. In SEC AO 2017-002, the Ethics Commission expressed that it had "the greatest concern with vague and ill-defined expenditures to a candidate's business, a family business, or a family member relating to 'consulting,' 'advising,' or similar services from which no tangible work product derives." Thus, in addition to the bona fide, fair market value, and documentation requirements, the Ethics Commission found that the person being paid "must actually be in the business for which they are receiving payment."

50. While Alan Morgan is currently a member of the House, on information and belief, he is not and never was in the business of running political campaigns. On information and belief, Alan Morgan is the Director of Sales Technology and Founder of Palmetto Fortis, which sells Christian educational materials to schools.¹⁰ Alan Morgan also reported on his SEIs to receiving private income in 2021 from Shellpoint Mortgage and in 2023 from Genesis Marketing, LLC, neither of which is in the business of consulting political campaigns.

51. Additionally, the Ethics Commission website shows that Morgan reported an expenditure of \$150.00 to Key Element Studios (Key Element) for "audio services," in October 2023. While Key Element appears to be incorporated separately from Majesty Music, these records show that the two businesses share the address of 733 Wade Hampton Boulevard in Greenville, SC.

⁹ Based on Majesty Music's purpose on the website, it describes itself as having the Mission "to advance the Gospel of Christ by providing God-glorifying, biblically-based, theologically-sound music and resources for the local church and family." See <https://www.majestymusic.com/about-majesty-music> (accessed August 29, 2024).

¹⁰ See <https://www.palmettofortis.com/meet-the-team> (accessed August 30, 2024).

52. I believe the Ethics Commission should investigate whether Morgan's September 2020 expenditures to Majesty Music and Alan Morgan and the 2023 expenditure to Key Element violated S.C. Code Ann. § 8-13-1348. The June 2018 expenditures to Majesty Music and Alan Morgan are outside the statute of limitations, but I include them here as evidence of a pattern or practice of Morgan's campaign to use campaign funds for unauthorized purposes.

Financial disclosure for Majesty Music and Hope for the Home

53. On his annual SEIs, Morgan is required to disclose "the private source *and type* of any income received in the previous year by the filer *or a member of his immediate family*." S.C. Code Ann. § 8-13-1120(A)(10) (emphasis added).

54. Similar information is required on the Financial Disclosure Reports Morgan was required to file with the U.S. House Ethics Committee as a Congressional candidate. On March 12, 2024, Morgan filed and certified his federal disclosure, *see Exhibit G*, and https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2023/10056440.pdf (accessed August 30, 2024), which listed the following private income:

SCHEDULE C: EARNED INCOME

Source	Type	Amount Current Year to Filing	Amount Preceding Year
Majesty Music	Salary	\$7,560.00	\$27,000.00
Majesty Music	Spouse Salary	\$3,641.00	\$35,000.00
Majesty Music	Royalties	\$7,938.00	\$29,940.00
Majesty Music	Spouse Royalties	\$4,962.00	\$16,708.00

55. On all relevant SEIs filed with the Ethics Commission, Morgan reported having a salary from Majesty Music, but he never reported that he also received royalties.

56. On his 2024 SEI (covering the 2023 reporting year), Morgan did not report that his spouse (Megan Hamilton Morgan) received any income at all. On no SEI has Morgan ever reported that his spouse received royalties.

57. Further, according to IRS records, Morgan has been the principal officer for a nonprofit organization, Hope for the Home, Inc. (Hope for the Home), in tax years 2018, 2019, 2020, 2021, and 2023. Like Majesty Music and Key Element, the address for Hope for the Home is also at 733 Wade Hampton Boulevard, Greenville, SC.

58. On May 15, 2024, Morgan certified the Hope for the Home Annual Financial Report, filed with the Public Charities Division of the South Carolina Secretary of State's Office, as the organization's CEO/President. The Annual Financial Report reports that for the fiscal year ending December 31, 2023, Hope for the Home has \$22,627.10 in total revenue, \$23,003.45 in Total Program Services Expenses, and \$53,493.59 in net assets at the end of the year. *See Exhibit H.*

59. On the Majesty Music website, Majesty Music and Morgan also solicit donations from the general public for Hope for the Home. When a user clicks the "donate" button, *see* <https://www.majestymusic.com/giving-tuesday> (accessed August 29, 2024), the following image is shown with Morgan dressed as a pirate:



Consider partnering with us for the 2024 Patch Live events and concerts. Our nationwide tours are only possible through the prayers and generous donations of God's people.

60. The website shows that Morgan and Majesty Music solicit donations for the non-profit which are used for his for-profit business to develop business partners and travel around the country. *See* <https://www.majestymusic.com/giving-tuesday> (accessed August 29, 2024) ("Your kind donation will allow Adam, Megan, and Shelly to bring additional ministry partners to assist as voice actors and singers in the delightful Patch productions and family worship concerts.").

61. Morgan has never reported income from Hope for the Home on any SEI. On information and belief, Morgan receives reportable private income from being CEO/President of Hope for the Home and/or from the travel funded from the Hope for the Home donations.

CONCLUSION

For the reasons stated above, I respectfully request that the Ethics Commission investigate Adam Morgan for violations of § 8-13-1348(A), § 8-13-1322(A), § 8-13-1340, § 8-13-1314(A)(1)(c), § 8-13-1308(F), § 8-13-1120(A)(10), and any other violation of the Ethics Act the Ethics Commission might uncover in its investigation or otherwise.

Respectfully submitted,

William R. Timmons IV

EXHIBIT A



JOIN

THE SOUTH CAROLINA FREEDOM CAUCUS

**FOR A
TELEPHONE TOWN HALL AND LEGISLATIVE UPDATE
WITH**



ADAM MORGAN

District 20

Chairman

South Carolina Freedom Caucus



ASHLEY TRANTHAM

District 28

Member

South Carolina Freedom Caucus



ALAN MORGAN

District 18

Member

South Carolina Freedom Caucus



**THURSDAY
OCTOBER 19 | 6:30PM**

**CALL-IN NUMBER:
877-229-8493**

EXHIBIT B

**ISSUE (Non-candidate) ADVERTISEMENT
AGREEMENT FORM**

I, Jonathan Parker, hereby request station time as follows: See Order for proposed schedule and charges. See Invoice for actual schedule and charges.

Check one:

- ☒ Ad "communicates a message relating to any political matter of national importance" by referring to (1) a legally qualified candidate for federal office; (2) an election to federal office; (3) a national legislative issue of public importance (e.g., health care legislation, IRS tax code, etc.); or (4) a political issue that is the subject of controversy or discussion at the national level.
- ☐ Ad does NOT communicate a message relating to any political matter of national importance (e.g., relates only to a state or local issue).

ALL QUESTIONS/BLOCKS MUST BE COMPLETED

Station time requested by: Restore the Values

Agency name: Restore Our Values

Address: 8595 Pellham Rd. Suite 400 #548

Contact: Jon Parker

Phone number: 864-209-0548

Email: RestoreOurValues@gmail.com

Name of advertiser/sponsor (list entity's full legal name as disclosed to the Federal Election Commission [for federal committees] with no acronyms; name must match the sponsorship ID in ad):

Name: Restore Our Values

Address: 8595 Pellham Rd. Suite 400 #548 Greenville SC 29615

Contact: Sean Wise

Phone number: 864-39-0548

Email: RestoreOurValues@gmail.com

Station is authorized to announce the time as paid for by such person or entity.

List ALL of the chief executive officers or members of the executive committee or board of directors or other governing group(s) of the advertiser/sponsor (Use separate page if necessary):

Sean Wise
Ken Murphy
Aaron Talmadge

By signing below, advertiser/sponsor represents that those listed above are the only executive officers, members of the executive committee and board of directors or other governing group(s).

If ad refers to a federal candidate(s) or federal election, list ALL of the following:

☐ N/A

Name(s) of every candidate referred to: William Timmons, Jeff Duncan

Office(s) sought by such candidate(s) (no acronyms or abbreviations): U.S. House of Representatives

Date of election: November 5th, 2024

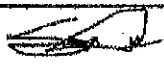
Clearly identify EVERY political matter of national importance referred to in the ad (no acronyms); use separate page if necessary:

☐ N/A

Debt Ceiling

THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.

The advertiser/sponsor agrees to indemnify and hold harmless the station for any damages or liability, including reasonable attorney's fees, which may arise from the broadcast of the above-requested advertisement(s). For the above-requested ad(s), the advertiser/sponsor also agrees to prepare a script, transcript or tape, which will be delivered to the station by the log deadlines outlined in the station's disclosure statement.

Advertiser/Sponsor	Station Representative
Signature: 	Signature: Bill Weston
Name: Sean Wise	Name: Bill Weston
Date of Request to Purchase Ad Time: 11/29/2024	Date of Station Agreement to Sell Time: 11/29/23

TO BE COMPLETED BY STATION ONLY

Ad submitted to station? ☒ Yes ☐ No Date ad received: 12/4/23

Note: Must have separate PB-19 forms (or the equivalent, e.g., addendums) for each version of the ad (i.e., for every ad with differing copy).

If only one officer, executive committee member or director is listed above, station should ask the advertiser/sponsor in writing if there are any other officers, executive committee members or directors, maintain records of inquiry and update this form if additional officers, members or directors are provided.

Disposition:

- ☒ Accepted
☐ Accepted IN PART (e.g., ad not received to determine content)*
☐ Rejected - provide reason (optional):

*Upload partially accepted form, then promptly upload updated final form when complete.

Date and nature of follow-ups, if any:

Received NAB Form, no order, no spot, once I receive any of those I will update the form

Received spot - Had to clear legal

Contract #: 2594/168	Station Call Letters: WYRD-FM	Date Received/Requested: 12/14/23
Est. #:	Station Location: GERMANY, IL	Run Start and End Dates: 12/12/23 - 12/14/23

For national issue ads only (not required for state/local issue ads):

Upload order, this disclosure form and invoice (or traffic system print-out) or other material reflecting this transaction to the OPIF or use this space to document schedule of time purchased, when spots actually aired, the rates charged and the classes of time purchased (including date, time, class of time and reasons for any make-goods or rebates) or attach separately. If station will not upload the actual times spots aired until an invoice is generated, the name of a contact person who can provide that information immediately should be placed in the "Terms and Disclosures" folder in the OPIF.

EXHIBIT C

Below is a screenshot of the original documents that were loaded on 12/11/23. The revised NAB form is being removed on 12/13/2023 due to incorrect information. A new revision is being uploaded.


[New Folder](#)
[New File](#)
[ZIP Archive](#)

[Browse](#)
[Political Files](#)
[2023](#)
[Non-Candidate Issue Ads](#)
[Executive and Whistle](#)

Name	Size	Date Uploaded	Status	Actions
				 
	213 KB	12/11/23	Completed	 

[New Folder](#)
[New File](#)
[ZIP Archive](#)

EXHIBIT D

**ISSUE (Non-candidate) ADVERTISEMENT
AGREEMENT FORM**

I, Sean Wise, hereby request station time as follows: See **Order** for proposed schedule and charges. See **Invoice** for actual schedule and charges.

Check one:

- ☒ Ad "communicates a message relating to any political matter of national importance" by referring to (1) a legally qualified candidate for federal office; (2) an election to federal office; (3) a national legislative issue of public importance (e.g., health care legislation, IRS tax code, etc.); or (4) a political issue that is the subject of controversy or discussion at the national level.
- ☐ Ad does NOT communicate a message relating to any political matter of national importance (e.g., relates only to a state or local issue).

ALL QUESTIONS/BLOCKS MUST BE COMPLETED

Station time requested by: Restore Our Values

Agency name: Restore Our Values

Address: 8595 Pelham Rd. Suite 400 #548, Greenville, SC, 29615

Contact: Sean Wise

Phone number: 864-309-0549

Email: info@restoreourvalues.net

Name of advertiser/sponsor (list entity's full legal name as disclosed to the Federal Election Commission [for federal committees] with no acronyms; name must match the sponsorship ID in ad):

Name: Restore Our Values

Address: 8595 Pelham Rd. Suite 400 #548, Greenville, SC, 29615

Contact: Sean Wise

Phone number: 864-309-0549

Email: info@restoreourvalues.net

Station is authorized to announce the time as paid for by such person or entity.

List ALL of the chief executive officers or members of the executive committee or board of directors or other governing group(s) of the advertiser/sponsor (Use separate page if necessary.):

Sean Wise
Ken Murphy
Aaron Talmadge

By signing below, advertiser/sponsor represents that those listed above are the only executive officers, members of the executive committee and board of directors or other governing group(s).

If ad refers to a federal candidate(s) or federal election, list ALL of the following:

☐ N/A

Name(s) of every candidate referred to: William Timmons, Jeff Duncan

Office(s) sought by such candidate(s) (no acronyms or abbreviations): U.S. House of Representatives

Date of election: November 5, 2024

Clearly identify EVERY political matter of national importance referred to in the ad (no acronyms); use separate page if necessary:

☐ N/A

Debt Ceiling

THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.

The advertiser/sponsor agrees to indemnify and hold harmless the station for any damages or liability, including reasonable attorney's fees, which may arise from the broadcast of the above-requested advertisement(s). For the above-requested ad(s), the advertiser/sponsor also agrees to prepare a script, transcript or tape, which will be delivered to the station by the log deadlines outlined in the station's disclosure statement.

Advertiser/Sponsor

Station Representative

Signature:

Signature:

Name: Sean Wise

Name:

Date of Request to Purchase Ad Time: December 11, 2023

Date of Station Agreement to Sell Time:

TO BE COMPLETED BY STATION ONLY

Ad submitted to station? ☐ Yes ☐ No Date ad received:

Note: Must have separate PB-19 forms (or the equivalent, e.g., addendums) for each version of the ad (i.e., for every ad with differing copy).

If only one officer, executive committee member or director is listed above, station should ask the advertiser/sponsor in writing if there are any other officers, executive committee members or directors, maintain records of inquiry and update this form if additional officers, members or directors are provided.

Disposition:

- ☐ Accepted
☐ Accepted IN PART (e.g., ad not received to determine content)*
☐ Rejected – provide reason (optional):

*Upload partially accepted form, then promptly upload updated final form when complete.

Date and nature of follow-ups, if any:

n/a

Contract #:

n/a

Station Call Letters:

Date Received/Requested:

Est. #:

n/a

Station Location:

Run Start and End Dates:

For national issue ads only (not required for state/local issue ads):

Upload order, this disclosure form and invoice (or traffic system print-out) or other material reflecting this transaction to the OPIF or use this space to document schedule of time purchased, when spots actually aired, the rates charged and the classes of time purchased (including date, time, class of time and reasons for any make-goods or rebates) or attach separately. If station will not upload the actual times spots aired until an invoice is generated, the name of a contact person who can provide that information immediately should be placed in the "Terms and Disclosures" folder in the OPIF.

N/A. Free time. There are no rates, invoice, or classes of time related to this run of spots. See either the attached for information on when the spots aired or this station will upload this information as soon as it is available.

EXHIBIT E

ORDER

Orders	Order / Rev:	2594168		
	Alt Order #:			
	Product Desc:	Timmons Duncan		
	Estimate:			
	Flight Dates:	12/12/23 - 12/14/23	Primary AE:	Greenville WYRD-FM
	Original Date / Rev:	12/11/23 / 12/11/23	Sales Office:	L-GVL
	Order Type:	POLITICAL-ISSUE	Sales Region:	Local
Agency	Name:	Wise Consulting - WCS	Billing Type:	Cash
	Buying Contact:	Sean Wise	Billing Calendar:	Broadcast
	Billing Contact:	Sean Wise	Billing Cycle:	EOM/EOC
		8595 Pelham Rd, Suite 400 #548	Agency Commission:	15%
		Greenville, SC 29615		
Advertiser	Name:	Restore the Values	New Business End:	
	Demographic:	P12+	Advertiser External ID:	219456
	Product Codes:	Issues/Propositions	Agency External ID:	194597
	Revenue Code 1:	AGY	Unit Code:	Issue -
	Revenue Code 2:	POL	Order Separation:	00:45:00
	Revenue Code 3:	POL-ISS		
	Priority:	FULL		

Bill Plan

Start Date	End Date	# Spots	Gross Amount	Net Amount
11/27/23	12/14/23	8	\$2,096.00	\$1,781.60

Totals

Month	# Spots	Gross Amount	Net Amount	Rating
December 2023	8	\$2,096.00	\$1,781.60	0.00
Totals	8	\$2,096.00	\$1,781.60	0.00

Account Executives

Account Executive	Sales Office	Sales Region	Start Date / End Date	Order %
Bill Weston	L-GVL	Local	Start Of Order - End Of Order	100%

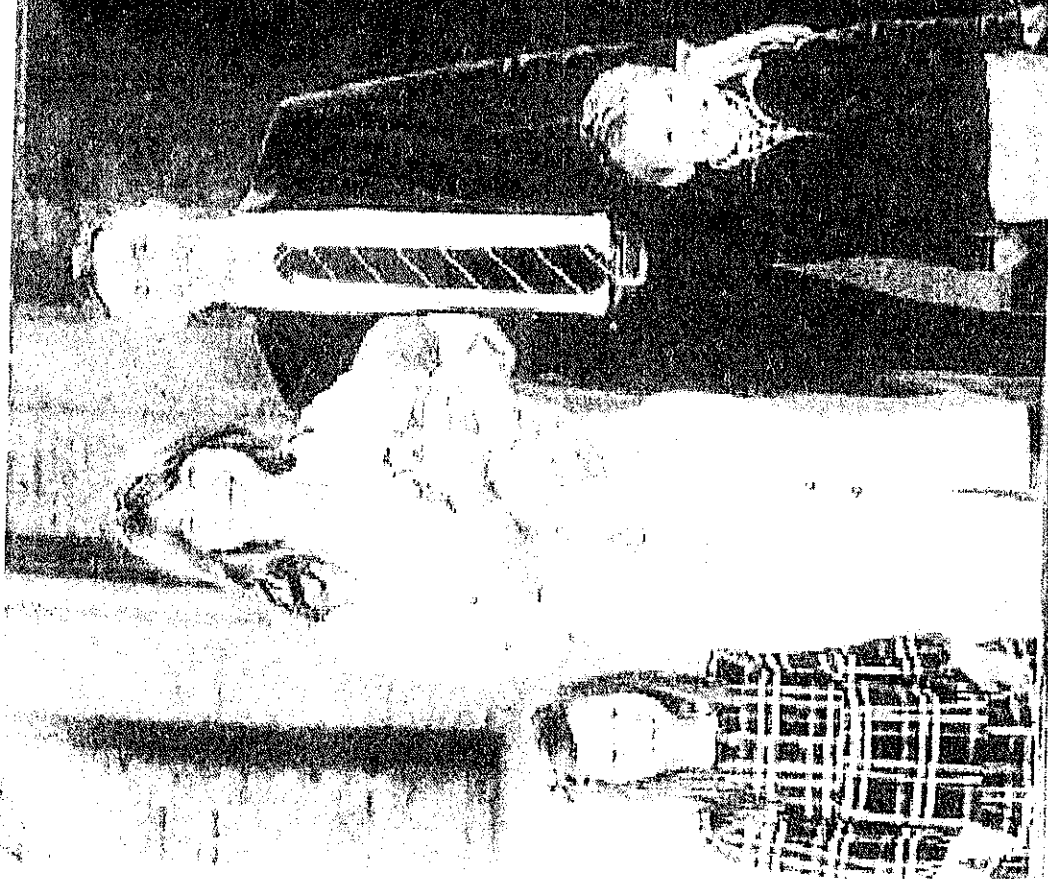
Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
N 1	WYRDF	12/12/23	12/14/23	M-F 6a-10a M-F	CM	6a-10a	-TWT---	1:00	8	\$262.00	ISSU	0.00	NM	8	\$2,096.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>			<u>Spots/Week</u>			<u>Rate</u>		<u>Rating</u>			
Week:		12/11/23	12/17/23	-TWT---			8			\$262.00		0.00			
Totals														8	\$2,096.00

EXHIBIT F

ADAM MORGAN

THANK YOU DISTRICT 20

PAID FOR BY ADAM MORGAN FOR STATE HOUSE



Dear friends and neighbors,

Thank you for the honor of representing you for the past 6 years in the South Carolina House of Representatives. When I first ran for office I needed on over 4,000 doors in Taylors and Greenville Eastside, and I made a promise to many of you—a promise to stand up to the Good Ole Boys in Columbia and work to make our state a better place to live.

immediately began leading the protest. I exposed corruption brought transparency to the state budget and helped elect a democratic, upright and successful candidate, and founded the Socialism Center to organize and deliver major campaign victory to progressive victors.

Our success brought massive opposition from lobbyists, special interests, groups, and corrupt politicians from both parties. They have relentlessly attacked us and spent over \$1 million trying to weaken us. But we keep fighting and winning. South Carolina is moving in the right direction, and our future is bright.

You are likely aware by now that I have decided to run for US Congress in our District. Therefore I will not be seeking re-election for State House District 20. It has been the honor of a lifetime serving you in the state legislature.

Thank you again for taking a chance
on a young guy with big ideas.

Adam Horvath

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EXHIBIT G



Filing ID #10056440

FINANCIAL DISCLOSURE REPORT

Clerk of the House of Representatives • Legislative Resource Center • 135 Cannon Building • Washington, DC 20515

FILER INFORMATION

Name: Adam Morgan
Status: Congressional Candidate
State/District: SC04

FILING INFORMATION

Filing Type: Candidate Report
Filing Year: 2023
Filing Date: 03/12/2024
Period Covered: 01/01/2023– 01/15/2024

SCHEDULE A: ASSETS AND "UNEARNED" INCOME

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
AbbVie Inc. Common Stock (ABBV) [ST] Description: Sold Abbvie stock	JT	\$1 - \$1,000	Capital Gains	None	\$201 - \$1,000
Alibaba Group Holding Limited American Depositary Shares each representing eight Ordinary share (BABA) [ST]	JT	\$1,001 - \$15,000	None		
Amazon.com, Inc. - Common Stock (AMZN) [ST]	JT	\$1,001 - \$15,000	None		
Ameriprise ⇌ AT&T Inc. (T) [ST] Description: Stock in Ameriprise brokerage account	JT	\$1,001 - \$15,000	Dividends	\$1 - \$200	\$1 - \$200
Ameriprise ⇌ JPMorgan Growth Advantage Class C (JGACX) [MF] Description: Mutual Fund in Ameriprise brokerage account	JT	\$1,001 - \$15,000	None		
Ameriprise ⇌ M&T Bank Corporation Common Stock (MTB) [ST] Description: Stock in Ameriprise brokerage account	JT	\$1,001 - \$15,000	Dividends	\$1 - \$200	\$1 - \$200

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
Berkshire Hathaway Inc. New Common Stock (BRK.B) [ST]	JT	\$1,001 - \$15,000	None		
Bitcoin [CT]	JT	\$1,001 - \$15,000	None		
Costco Wholesale Corporation - Common Stock (COST) [ST]	JT	\$1,001 - \$15,000	Capital Gains	None	\$1,001 - \$2,500
DESCRIPTION: Sold Costco stock					
Empower SC State ORP ⇒ JPMorgan Core Bond Fund R6 (JCBUX) [MF]	JT	\$1,001 - \$15,000	Tax-Deferred		
DESCRIPTION: defined contribution plan for state of SC					
Empower SC State ORP ⇒ MassMutual Select Blue Chip Growth Fund Class I (MBCZX) [MF]	JT	\$1,001 - \$15,000	Tax-Deferred		
DESCRIPTION: defined contribution plan for state of SC					
Empower SC State ORP ⇒ MFS International Growth Fund Class R6 (MGRDX) [MF]	JT	\$1,001 - \$15,000	Tax-Deferred		
DESCRIPTION: defined contribution for state of SC					
Empower SC State ORP ⇒ Vanguard Index Trust Small-Cap Index Fund Instl Shares (VSCI) [MF]	JT	\$1,001 - \$15,000	Tax-Deferred		
DESCRIPTION: defined contribution plan from state of SC					
Empower SC State ORP ⇒ Vanguard Inflation Protected Securities Fund (VIPSX) [MF]	JT	\$1,001 - \$15,000	Tax-Deferred		
DESCRIPTION: defined contribution plan from state of SC					
Empower SC State ORP ⇒ Vanguard Mid-Cap Index Fund Instl Plus (VMCPX) [MF]	JT	\$1,001 - \$15,000	Tax-Deferred		
DESCRIPTION: defined contribution plan for state of SC					
International Business Machines Corporation Common Stock (IBM) [ST]	JT	\$1 - \$1,000	Capital Gains	None	\$201 - \$1,000
DESCRIPTION: Sold IBM stock					
Lowe's Companies, Inc. Common Stock (LOW) [ST]	JT	\$1,001 - \$15,000	Dividends	\$1 - \$200	\$1 - \$200
Phillips 66 Common Stock (PSX) [ST]	JT	\$1 - \$1,000	Capital Gains	None	\$201 - \$1,000
DESCRIPTION: Sold Phillips 66 stock					

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
Corp Business Bank Account		\$500,001 - \$1,000,000	Interest	\$1,001 - \$2,500	\$6,001 - \$15,000
S Corp ⇒ Majesty Music Location [RP] LOCATION: Greenville/Greenville, SC, US		\$1,000,001 - \$5,000,000	None		
Tesla, Inc. - Common Stock (TSLA) [ST]	JT	\$1,001 - \$15,000	None		
Vanguard IRA Vanguard IRA [111] DESCRIPTION: Mutual funds - VEXPX and VWNFX		\$50,001 - \$100,000	Tax-Deferred		
Vanguard IRA ⇒ Vanguard IRA [111] DESCRIPTION: Mutual fund - VIAGX		\$50,001 - \$100,000	Tax-Deferred		
Vanguard S&P 500 ETF (VOO)	JT	\$1,001 - \$15,000	Dividends	\$1 - \$200	\$1 - \$200
Vanguard Total Stock Market ETF (VTI)	JT	\$1,001 - \$15,000	Dividends	\$1 - \$200	\$1 - \$200
Visa Inc. (V) DESCRIPTION: Sold Visa stock	JT	\$1 - \$1,000	Capital Gains	None	\$201 - \$1,000
Wells Fargo Account	JT	\$50,001 - \$100,000	Interest	\$1 - \$200	\$1 - \$200

* Investment vehicle details available at the bottom of this form. For the complete list of asset type abbreviations, please visit <https://fd.house.gov/reference/asset-type-codes.aspx>.

SCHEDULE C: EARNED INCOME

Source	Type	Amount Current Year to Filing	Amount Preceding Year
Majesty Music	Salary	\$7,500.00	\$47,000.00
Majesty Music	Spouse Salary	\$5,641.00	\$35,000.00
Majesty Music	Royalties	\$7,938.00	\$29,940.00
Majesty Music	Spouse Royalties	\$4,962.00	\$18,708.00

SC State Treasurer	State House Salary	\$11,157.00	\$30,000.00
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SCHEDULE D: LIABILITIES

Owner	Creditor	Date Incurred	Type	Amount of Liability
JT	Loancare	January 2017	Mortgags on home	\$100,001 - \$250,000

SCHEDULE E: POSITIONS

Position	Name of Organization
Representative	South Carolina House of Representatives
President	Majesty Music, Inc.

SCHEDULE F: AGREEMENTS

Date	Parties To	Terms of Agreement
January 2019	State of South Carolina	Defined contribution plan. State ORP

SCHEDULE J: COMPENSATION IN EXCESS OF \$5,000 PAID BY ONE SOURCE

None disclosed.

SCHEDULE A INVESTMENT VEHICLE DETAILS

- Ameriprise (Owner: JT)
- Empower SC State ORP (Owner: JT)
- S Corp
LOCATION: Greenville / Greenville, SC, US
- Vanguard IRA

EXCLUSIONS OF SPOUSE, DEPENDENT, OR TRUST INFORMATION

Trusts: Details regarding "Qualified Blind Trusts" approved by the Committee on Ethics and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or dependent child?

Yes No

Exemption: Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption?

Yes No

CERTIFICATION AND SIGNATURE

I CERTIFY that the statements I have made on the attached Financial Disclosure Report are true, complete, and correct to the best of my knowledge and belief.

Digitally Signed: Adam Morgan , 03/12/2024

EXHIBIT H

SOUTH CAROLINA SECRETARY OF STATE

PUBLIC CHARITIES DIVISION ANNUAL FINANCIAL REPORT

Filing Instructions

- Organizations who file the IRS 990-N or are not required to file with the IRS should complete this form.
- Please follow the instructions provided on pages 4 and 5 to complete this form. You may contact our office with any questions at 803-734-1790 or email charities@sos.sc.gov.
- We do not accept this filing by fax or email; you may upload this report using our online filing system at sos.sc.gov or mail this form to: South Carolina Secretary of State, Attn: Division of Public Charities, 1205 Pendleton St., Suite 525, Columbia, SC 29201.

For the fiscal year ending 12/31/2023 (mm/dd/yy) EIN: 52 - 1042639 Charity ID: C6147

Organization's Name: Hope For The Home, Inc.

Part I— Fundraising Events or Contracts

If your organization held any fundraising events, or used a commercial co-venturer (CCV) or professional fundraising company (PFR) during the previous fiscal year, you must report all revenue and expenses in the following table. Events include, but are not limited to, carnivals, dinners, galas, raffles, and bingo games. If you need additional space, you may list additional events on a separate sheet and include the amounts in the total revenue and expenses on this table.

(A) Name of Event, CCV or PFR	(B) Gross Receipts & Contributions	(C) Cash & Noncash Prize Expenses	(D) Other Expenses	(E) Total Expenses	(F) Net Revenue
1.				\$ 0.00	\$ 0.00
2.				\$ 0.00	\$ 0.00
3.				\$ 0.00	\$ 0.00
4.				\$ 0.00	\$ 0.00
5.				\$ 0.00	\$ 0.00
6.				\$ 0.00	\$ 0.00
7.				\$ 0.00	\$ 0.00
8.				\$ 0.00	\$ 0.00
9.				\$ 0.00	\$ 0.00
10.				\$ 0.00	\$ 0.00
11. Gross Revenue (add 1B through 10B)	\$ 0.00	12. Total Expenses (add 1E through 10E)		\$ 0.00	\$ 0.00

Part II— Gross Revenue

Organizations must report their gross receipts from all sources of revenue.

1. Fundraising events (from page 1, part I, box 11B)	\$ 0.00
2. Fundraising activity revenue not reported on line 1	\$ 22,827.10
3. Federated campaigns (such as United Way)	
4. Membership dues	
5. Related organizations (such as related parent or national organizations)	
6. Government grants (from federal, state or local governments)	
7. All other contributions, gifts, grants not listed above	
8. Program service revenue	
9. Other income	
10. Total revenue (add lines 1 through 9)	\$ 22,827.10

Part III— Program Service Expenses

Describe the organization's program accomplishments and the amount spent on each. If more space is needed you may attach an additional sheet if necessary.

11. Patch Live Program	\$ 23,003.45
12.	\$
13. Total Program Service Expenses (add lines 11 and 12)	\$ 23,003.45

Part IV— Management, General and Fundraising Expenses

14. Program expenses (from part III, line 13)	\$ 23,003.45
15. Direct expenses from fundraising events and contracts (box 12E)	\$ 0.00
16. Fundraising expenses (not included in the amount on line 15)	\$ 91.53
17. Payments to related organizations	
18. Salaries and other compensation	
19. Management and general expenses	
20. Professional fees and other payments to independent contractors	
21. Other expenses not listed above	
22. Total expenses (add lines 14 through 21)	\$ 23,094.98
23. Excess or (deficit) for the year (subtract line 22 from line 10)	(\$ 467.88)
24. Fund balances/net worth at the beginning of the fiscal year	\$ 53,961.47
25. Changes in fund balances/net worth (attach explanation)	
26. Fund balances/net worth at the end of the fiscal year (add lines 23 through 25)	\$ 53,493.59

Part V— Balance Sheet

27. Total assets	\$ 53,493.59
28. Total liabilities	
29. Net assets or fund balances at end of year (subtract line 28 from line 27)	\$ 53,493.59

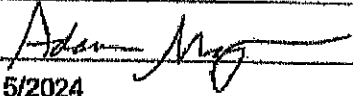
Certification

As required by Section 33-56-60 of the Solicitation of Charitable Funds Act, this form shall be signed by the Chief Executive Officer and the Chief Financial Officer of the charitable organization. (If one person serves as both CEO and CFO, he or she should sign in both places below.)

We certify that the information furnished in this statement is true and correct to the best of our knowledge and belief.

CEO/President

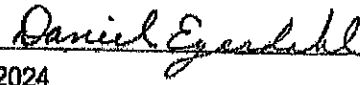
Name: Adam Morgan

Signature: 

Date: 05/15/2024

CFO/Treasurer

Name: Daniel Egerdahl

Signature: 

Date: 05/15/2024

Mailing Address: 733 Wade Hampton Blvd, Greenville, SC 29609

Email Address: degerdahl@majestymusic.com Phone Number: 864-242-6722

State Ethics Commission—Recommendation to House Legislative Ethics Committee
In the Matter of Adam Morgan

COMPLAINANT INFORMATION

Name	William R. Timmons, IV
Address	P.O. Box 3416, Greenville, SC 29602
Telephone Number	(864) 241-0175
Fax Number	None
Email	Unknown

RESPONDENT INFORMATION

Name	Adam Morgan
Address	803 Ikes Road, Taylors, SC 29687
Telephone Number	(803) 212-6795
Fax Number	None
Email	adamm@majestymusic.com
Attorney Information	N/A
Confidentiality Waived	No

COMPLAINT INFORMATION

Complaint No.	C2024-075
Complaint Received	September 18, 2024
Facts Sufficient Determination	September 19, 2024
Facts Sufficient Determination Made By	Meghan Walker Dayson, Executive Director

COMMISSION RECOMMENDATION

The State Ethics Commission recommends that the House Ethics Committee find probable cause is present and charge Respondent with the following:

One (1) count of violating §8-13-1120(A)(10) for failing to report spousal income on the 2024 Statement of Economic Interests

One (1) count of violating §8-13-1314 for accepting an in-kind contribution in excess of \$1,000 for the "Farewell Mailer" valued at \$3,989.82 from Ivory Tusk without rendering payment

One (1) count of violating §8-13-1340(A) for making an independent expenditure to Stephen Frank for advocating for the election of Stephen Frank on the "Farewell Mailer"

TOTAL: Three (3) counts

State Ethics Commission—Addendum Recommendation to House Legislative Ethics
Committee
In the Matter of Adam Morgan

COMPLAINANT INFORMATION

Name	William R. Timmons, IV
Address	P.O. Box 3416, Greenville, SC 29602
Telephone Number	(864) 241-0175
Fax Number	None
Email	Unknown

RESPONDENT INFORMATION

Name	Adam Morgan
Address	803 Ikes Road, Taylors, SC 29687
Telephone Number	(803) 212-6795
Fax Number	None
Email	adamm@majestymusic.com
Attorney Information	N/A
Confidentiality Waived	No

COMPLAINT INFORMATION

Complaint No.	C2024-075
Complaint Received	September 18, 2024
Facts Sufficient Determination	September 19, 2024
Facts Sufficient Determination Made By	Meghan Walker Dayson, Executive Director

COMMISSION RECOMMENDATION

The State Ethics Commission recommends that the House Ethics Committee find probable cause is present and charge Respondent with the following additional violation:

One (1) count of violating §8-13-1308 for accepting an in-kind contribution valued at \$737.20 for “Birthday Mailer” from Ivory Tusk without rendering payment.

TOTAL: One (1) count