)	IN THE SENATE OF THE STATE
)	OF SOUTH CAROLINA BEFORE
)	THE SENATE ETHICS COMMITTEE
)	
ORD,)	
)	
)	INITIAL RESPONSE AND REQUEST
Respondent.)	TO EXTENTION OF TIME TO ANSWER
)	OR OTHERWISE PLEAD
)))))))))))))

Now comes the Respondent above named answering the charges received by the Respondent and says:

- 1. That all charges not admitted herein are respectfully denied.
- 2. That the Respondent acknowledges that the filings in question are not accurate due to Accounting errors.
- 3. That allegations Number 1 is denied.
- 4. That allegation Number 2 is denied.
- 5. That allegation Number 3 is denied.
- 6. That allegations 4, 5, and 6 are denied as stated.
- 7. That Paragraph 7 is admitted in that there was a failure to properly enter loans to the campaign and thus the payments on such loans, while a legitimate for purposes of accounting appear to be improper payments
- 8. That the Respondent has not been Noticed as to the specifics of each allegation and therefore cannot fully respond.
- 9. That the Respondent is prepared to show, by way of example only, that expenditures to S.C.E. & G. for Barrett Road are appropriate expenditures as that is his District Office as well as his campaign office.

10. That Respondent is prepared to address such individual expenditures as questioned by the Committee when the Committee directs Respondents attention to the individual items questioned.

WHEREFORE, Respondent prays as follows:

- A. That he be given such bill of Particulars as the Committee desires.
- B. That he have an extended period to answer or otherwise plead to matters as they will be affected by subpoenaed materials which have not yet been received.
- C. That the period to answer should be extended to fifteen (15) days after the service of the last materials which the Committee directs the Respondents attention to in this matter.

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(843)571-3515

SC Bar No.: 4838

Dated this ____ day of May, 2013 in Charleston, South Carolina.