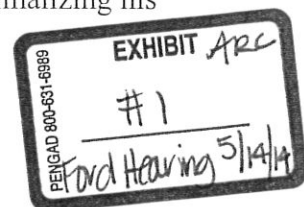


In the Matter of the South Carolina)
Senate Ethics Committee's Complaint)
Against Senator Robert I. Ford)
_____)

STIPULATION AGREEMENT

This action was initiated by the South Carolina Senate Ethics Committee's (the "Committee" or "Complainant") Complaint served on former Senator Robert I. Ford ("Senator Ford" or "Respondent") (collectively the "Parties") on January 23, 2014. A public hearing is scheduled on this Matter for May ~~14~~, 2014, pursuant to Senate Rules 44 and 44.1. As a means to conduct the hearing in an expeditious manner, and not to serve as the Respondent's express admission to the violations alleged in the Complaint, the respective Parties hereby stipulate and agree to the facts set forth below in paragraphs one (1) through thirty (30). The Parties further agree that this Stipulation Agreement is for purposes of this Matter only and **NOT** for any other Administrative or Judicial Proceeding.

1. Pursuant to S.C. Const. Art. III, § 12, Senate Rules 44 and 44.1, and S.C. Code Ann. § 8-13-530 (Supp. 2013), the Committee has jurisdiction over this Matter. *WD RDR*
2. Copies of all documents returned in response to the Committee's subpoenas issued to Bank of America, the Committee's email inquiry with the Council on Finance and Administration of the United Methodist Church, and the Committee's email inquiry with the South Carolina Secretary of State's office have been produced to Mr. William L. Runyon, Jr. ("Mr. Runyon"), who serves as Senator Ford's attorney. The Parties acknowledge that such documents and email messages are true and authentic copies of the original versions thereof, and the content of such documents or messages is accurate and not in dispute. The Parties hereby waive any objection to their admissibility at the hearing should either Party find necessary the admission of any such document or email message. *WD RDR*
3. All signatures and endorsements bearing the name "Robert Ford" appearing on checks included in Bank of America's return to the Committee's subpoenas were signed by Senator Ford or at his direction. *WD RDR*
4. During the period involved in this Matter, Senator Ford has resided at 1151 Barrett Road, Charleston, South Carolina. Senator Ford leases the home at that location from Ms. Ethel James, who is believed to be a resident of the State of Florida. *WD RDR*
5. By letter dated October 18, 2013, Senator Ford notified the Committee that he had closed his campaign banking account "at the scheduled campaign Disclosure Report period" following his resignation in June (which was the July 10, 2013, reporting period) and requested guidance for finalizing his campaign disclosure reporting obligations. *WD RDR*
6. By letter dated November 5, 2013, the Committee's Chairman, Senator Luke Rankin ("Chairman Rankin"), advised Senator Ford of the necessary procedures for finalizing his



reporting obligations. Additionally, based on Senator Ford's statement that he had closed his campaign banking account, Chairman Rankin also inquired in the letter about the final disposition of approximately \$11,000 in campaign funds that were not reported on Senator Ford's July 10, 2013, or October 10, 2013, Campaign Disclosure Reports. Chairman Rankin also requested that Senator Ford supply the Committee copies of his campaign banking account statements for the months of April through July (2013) no later than November 15, 2013. *WR RDR*

7. Senator Ford did not respond to Chairman Rankin's letter and failed to supply copies of the requested bank statements on or before the November 15 deadline. *WR RDR*
8. On November 16, 2013, Senator Ford filed "Amendment 1" to his October 10, 2013, Report and reported the following campaign expenditures totaling \$11,837.63: (1) \$3,535.06 to Print Shop of West Ashley on October 8, 2013; (2) \$3,516.43 to Print Shop of West Ashley on October 18, 2013; and (3) \$4,786.14 to Nelson Printing Corporation on October 21, 2013. *WR RDR*
9. These three campaign expenditures, as well as their corresponding transaction dates, were **NOT** consistent with Senator Ford's October 18 letter, in which he stated his campaign banking account had been closed in June following his resignation. *WR RDR*
10. By letter dated December 6, 2013, Chairman Rankin notified Senator Ford of this apparent inconsistency and, again, requested that Senator Ford supply the Committee with copies of his Senate campaign banking account statements for the months of April through November (2013) no later than December 20, 2013. *WR RDR*
11. Mr. Runyon forwarded to the Committee via letter, dated December 13, 2013, copies of Senator Ford's campaign banking account statements for the months of April through June (2013), along with a letter from Bank of America stating that Senator Ford had closed his campaign banking account on June 10, 2013. *WR RDR*
12. Senator Ford's June 2013 campaign banking account statement reflects that check #1181, in the amount of \$14,758.17, was drawn on the account on June 10, 2013, and reduced the balance to zero. *WR RDR*
13. The \$14,758.17 expenditure made on June 10, 2013, was not reported on Senator Ford's July 10, 2013, Campaign Disclosure Report or any subsequent Campaign Disclosure Report or Amendment thereto. None of the October expenditures reported on Amendment 1 to Senator Ford's October 10, 2013, Campaign Disclosure Report appeared on Senator Ford's campaign banking account statements. *WR RDR*
14. By subsequent letter on December 17, 2013, Chairman Rankin notified Senator Ford that the campaign banking account statement and the Bank of America letter were inconsistent with Senator Ford's July 10, 2013, Campaign Disclosure Report (filed July 10, 2013) and Amendment 1 to the October 10, 2013, Campaign Disclosure Report. Senator Ford was requested to supply the Committee with copies of all checks drawn on

the campaign banking account for the months of April, May and June 2013 no later than January 10, 2014. *WHD RDR*

15. Senator Ford did not respond to Chairman Rankin's December 17 letter or otherwise supply copies of the requested checks on or before the January 10 deadline. *WHD RDR*
16. On January 10, 2014, Senator Ford filed "Amendment 2" to his October 10, 2013, Campaign Disclosure Report and reported eleven (11) separate mileage reimbursements to himself, totaling \$7,876, as having been made on May 31, 2013. The expenditures did not appear, individually or aggregately, on Senator Ford's May or June 2013 campaign banking account statements. *WHD RDR*
17. On January 27, 2014, the Committee issued a subpoena to Bank of America for copies of the additional campaign banking account records that Senator Ford failed to produce to the Committee. The Committee received Bank of America's return to the subpoena on February 7, 2014. *WHD RDR*
18. The responsive documents supplied by Bank of America established that check #1181, in the amount of \$14,758.17, was made payable to "Twin City Outreach Mission Black Community Developer's Program" ("TCOM-BCDP"). *WHD RDR*
19. This final, unreported campaign expenditure paid to TCOM-BCDP was **NOT** consistent with the expenditures that Senator Ford reported on his July 10, 2013, Campaign Disclosure Report and Amendments 1 and 2 to his October 10, 2013, Campaign Disclosure Report. *WHD RDR*
20. On February 10, 2014, the Committee issued a subpoena to Bank of America for TCOM-BCDP's banking records for the months of June 2013 through January 2014. *WHD RDR*
21. Responsive documents supplied by Bank of America established that the account number for TCOM-BCDP's banking account is _____ the account owner's name is Twin City Outreach *Ministry* Black Community Developer's Program, as opposed to Twin City Outreach *Mission* Black Community Developers Program. The EIN on record for the account is 362167731. *WHD RDR*
22. The address listed on TCOM-BCDP's checks is P.O. Box 21302, Charleston, SC 29413-1302, and the telephone number is (843) 852-0777. This post office box address is the same address that appeared on Senator Ford's campaign banking accounts and some of his personal checking accounts. This telephone number is to the landline phone located at 1151 Barrett Road, Charleston, South Carolina. *WHD RDR*
23. EIN 362167731 was originally issued to the Council on Finance and Administration of the United Methodist Church, a/k/a the United Methodist Church and its Affiliated Organizations ("GCFA") as part of a "group ruling" granting tax exempt status under Internal Revenue Code Section 501(c)(3). *WHD RDR*

24. The GCFA confirmed that neither TCOM-BCDP nor the Twin City Outreach Ministry Black Community Developers Program were included, currently or previously, in the Section 501(c)(3) tax exemption group ruling issued to GCFA. An email sent to Lyn Odom from the GCFA states:

Mr. Odom,

Good afternoon.

We have searched both our electronic and paper files and have not found any records indicating that either Twin City Outreach Ministry Black Community Developers Program or Twin City Outreach Mission Black Community Developers Program is included in the group ruling held by GCFA. The EIN that you have listed is GCFA's former EIN. We acquired a new EIN because our former EIN was being inadvertently used by organizations in our group ruling that did not understand they needed to use or obtain their own EIN. Also, we should point out there are more than 30,000 local churches and other affiliated organizations in our group ruling. Hence, it is not unusual for some organizations to believe they are in our group ruling when they are not. We are sorry we cannot be of more help.

Sincerely,

Leticia Mayberry Wright
Legal Department, GCFA
The United Methodist Church
1 Music Circle North
Nashville, TN 37203-0029
Phone: 615.369.2334
Email: legal@gcfa.org

WR RDR

25. The TCOM-BCDP and the Twin City Outreach Ministry Black Community Developers Program are not organizations exempt from taxation under Section 501(c)(3) of the Internal Revenue Code of 1986. *WR RDR*

26. TCOM-BCDP's bank statement for the period July 10, 2013 through August 8, 2013 gives the appearance that Senator Ford electronically transferred \$800 from TCOM-BCDP's bank account to his personal Bank of America checking account (ending -8110) on August 7, 2013. *WR RDR*

27. Checks posted to TCOM-BCDP's banking account from June 2013 through January 2014 give the appearance that Senator Ford utilized funds from TCOM-BCDP's banking account to pay various personal expenses including, but not limited to, personal credit card bills, rent and utility bills for his residence, tailoring and alterations of clothing, car

payments, car detailing services, lawn services for his residence, and personal loan payments. *wa RDR*

28. TCOM-BCDP's check #3123, in the amount of \$500, was payable to "Cash/Robert Ford," signed by Robert Ford, endorsed by Robert Ford, and negotiated by Bank of America on August 26, 2013. *wa RDR*

29. The following accounts, as identified by the merchant's name and the last four (4) digits of the account number (where possible), are in the name of "Robert Ford" or "Robert I. Ford" and are his personal accounts and not the accounts of TCOM-BCDP:

MERCHANT	ACCOUNT
SCE&G	-4573
Saks MasterCard	-8561
Bank of America	-4098
Bank of America	-9385
TJX (TJ MAXX)	-1422
Chase	-9602
AT&T	-8221
AAA	-5534
Home Depot	-4657
Marriott Card Services	-0576
State Farm Bank	-1012
A.D.T.	-4392
Shell	-4170
State Farm Bank	-9570
Synovus Bank (NBSC)	-4541
CapitalOne	-1394
Sears	-3403
Marriott Rewards Card	-9816
Sears	-3254
Charleston Water Systems	034125-054
Dillard's	-5173
Chase	-0398
Wal-Mart	-7519

30. The Twin City Outreach Mission, which is believed to be a 501(c)(3) organization recognized by the Internal Revenue Service with EIN 31-1805885 and, according to its most recent filing with the South Carolina Secretary of State's office, located at 2178 Savannah Highway, Suite 10, Charleston, South Carolina, is a separate and distinct organization from TCOM-BCDP. *wa RDR*

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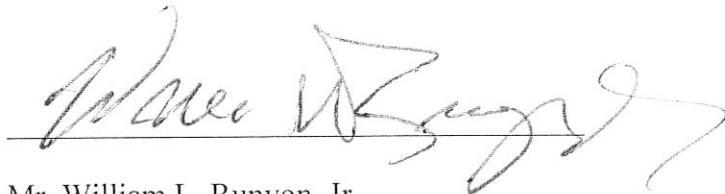
State of South Carolina
County of Charleston

Signed, this 28 day of April, 2014, **IT IS SO AGREED:**

A handwritten signature in cursive script, appearing to read "Robert D. Robbins", written over a horizontal line.

Mr. Robert D. Robbins
Robert D. Robbins, Attorney at Law, LLC
110 N. Main St.
Summerville, SC 29483
(843) 285-7100

Special Counsel to the Complainant

A handwritten signature in cursive script, appearing to read "William L. Runyon, Jr.", written over a horizontal line.

Mr. William L. Runyon, Jr.
#3 Gamecock Avenue
Ste. 303
Charleston, SC 29407
(843) 571-3515

Counsel for the Respondent