

WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW

930 RICHLAND STREET

P.O. BOX 8416

COLUMBIA, SOUTH CAROLINA 29202-8416

MITCHELL M. WILLOUGHBY
JOHN M.S. HOEFER
RANDOLPH R. LOWELL
TRACEY C. GREEN
BENJAMIN P. MUSTIAN
ELIZABETH ZECK*
ELIZABETHANN LOADHOLT FELDER
ANDREW J. MACLEOD
CHAD N. JOHNSTON
JOHN W. ROBERTS

AREA CODE 803
TELEPHONE 252-3300
TELECOPIER 256-8062

April 18, 2012

*ALSO ADMITTED IN TX

Via Hand Delivery

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
Post Office Box 11330
Columbia, South Carolina 29211

RE: Petition for Original Jurisdiction

Dear Mr. Shearouse:

Enclosed for filing please find the following:

- An original Petition for Original Jurisdiction including an attached complaint with affidavits and other exhibits as required by South Carolina Rule of Appellate Practice 245 along with twelve (12) copies. The required notice also is attached.
- An original Motion to Expedite along with (12) copies filed pursuant to South Carolina Rule 240. You will also find enclosed our check in the amount of \$25.00 for the filing fee.
- A Certificate of Service certifying that we are in the process of making personal service. Affidavits of final service will be filed as soon as practicable.

Please acknowledge your receipt of the enclosed documents by file stamping the extra copy of these documents and returning it to me via my courier.

If you have any questions, please do not hesitate to call.

Sincerely,

WILLOUGHBY & HOEFER, P.A.


Tracey C. Green

**THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT

Michael Anderson and Robert G. Barber, Plaintiffs-Petitioners,

v.

South Carolina State Election Commission, Marci Andino, as Executive Director of the South Carolina State Election Commission and as a representative of the South Carolina State Election Commission, South Carolina Democratic Party, Richard A. Harpootlian, as Chair of the Executive Committee of the South Carolina Democratic Party and as a representative of the South Carolina Democratic Party, South Carolina Republican Party, Chad Connelly, as Chairman of the Executive Committee of the South Carolina Republican Party, Lexington County Commission Of Registration and Elections, Dean Crepes, as Director of the Lexington County Commission Of Registration and Elections, Lexington County Democratic Party, Kathy Hensley, as Chair of the Lexington County Democratic Party, Lexington County Republican Party, Steven Isom, as Chair of the Executive Committee of the Lexington County Republican Party,Defendants-Respondents.

Certificate of Service

This is to certify that I, an administrative assistant with the law firm Willoughby & Hoefer, P.A., have caused to be served this day or as soon as possible one (1) copy of the Notice of Petition for the above-captioned matter via hand delivery to each of the following:

Marci Andino
State Election Commission
2221 Devine Street, Suite 105
Columbia, SC 29205

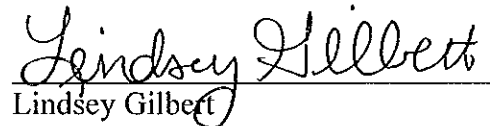
Dick Harpootlian
South Carolina Democratic Party Chairman
1410 Laurel Street
Columbia, SC 29201

Chad Connelly
South Carolina Republican Party Chairman
1913 Marion Street
Columbia, SC 29201

Dean Crepes
Lexington County Commission
605 West Main Street
Lexington, SC 29072

Kathy Hensley
Lexington County Democratic Party Chairman
Lexington County Democratic Party
104 Parkview Ct
Lexington, SC 29072-3872

Steven Isom
Lexington County Republican Party Chairman
Lexington County Republican Party
600 Columbia Ave.
Lexington, SC 29072


Lindsey Gilbert

Columbia, South Carolina
This 18th day of April 2012.

**THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT

Michael Anderson and Robert Barger, Plaintiffs-Petitioners,

v.

South Carolina State Election Commission; Marci Andino, as Executive Director and as a representative of the South Carolina State Election Commission; South Carolina Democratic Party; Richard A. Harpootlian, as Chair of the Executive Committee of and as a representative of the South Carolina Democratic Party; South Carolina Republican Party; Chad Connelly, as Chair of the Executive Committee of and as a representative of the South Carolina Republican Party; Lexington County Commission of Registration and Elections; Dean Crepes, as Director of and as a representative of the Lexington County Commission of Registration and Elections; Lexington County Democratic Party; Kathy Hensley, as Chair of and as a representative of the Lexington County Democratic Party; Lexington County Republican Party; Steven Isom, as Chair of and representative of the Executive Committee of the Lexington County Republican Party,Defendants-Respondents.

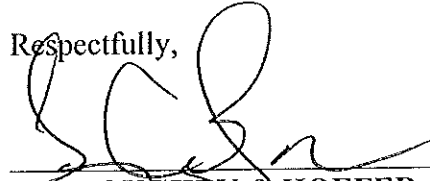
NOTICE

TO THE DEFENDANTS-RESPONDENTS ABOVE-NAMED:

PLEASE TAKE NOTICE that, pursuant to Rule 245 of the South Carolina Appellate Court Rules, you are required to serve and file a return to the Petition for Original Jurisdiction in this matter within twenty (20) days after service hereof, excluding

the date of service. If you fail to file and serve a return to the Petition within the time aforesaid, you may be deemed to have consented to the relief requested in said Petition.

Respectfully,

A handwritten signature in black ink, appearing to be 'Tracey C. Green', written over a horizontal line.

WILLOUGHBY & HOEFER, P.A.

Tracey C. Green

Benjamin P. Mustian

Post Office Box 8416

Columbia, South Carolina 29202-8416

(803) 252-3300

*Attorneys for Petitioners Michael Anderson
and Robert G. Barger*

Columbia, South Carolina
April 18, 2012

**THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT

Michael Anderson and Robert Barger, Plaintiffs-Petitioners,

v.

South Carolina State Election Commission; Marci Andino, as Executive Director and as a representative of the South Carolina State Election Commission; South Carolina Democratic Party; Richard A. Harpootlian, as Chair of the Executive Committee of and as a representative of the South Carolina Democratic Party; South Carolina Republican Party; Chad Connelly, as Chair of the Executive Committee of and as a representative of the South Carolina Republican Party; Lexington County Commission of Registration and Elections; Dean Crepes, as Director of and as a representative of the Lexington County Commission of Registration and Elections; Lexington County Democratic Party; Kathy Hensley, as Chair of and as a representative of the Lexington County Democratic Party; Lexington County Republican Party; Steven Isom, as Chair of and representative of the Executive Committee of the Lexington County Republican Party,Defendants-Respondents.

MOTION TO EXPEDITE

Plaintiffs-Petitioners Michael Anderson and Robert G. Barber ("Plaintiffs") respectfully move this Court to expedite its consideration of the Petition for Original Jurisdiction ("Petition") and Complaint filed contemporaneously herewith and incorporated herein by reference. In support of this motion, Plaintiffs would respectfully show until this Court as follows:

1. This matter involves the pending certification of certain individuals seeking nomination by political party primary to become candidates for the South Carolina House of Representatives, the South Carolina Senate, or a countywide office. Consequently, this matter seeks to resolve questions surrounding the state primary elections scheduled for June 12, 2012 and the integrity of this state's election process, which is a matter of serious public interest and concern.

2. In considering whether individuals seeking to be nominated should be certified, political parties are required to verify whether those individuals have complied with certain provisions of the South Carolina Ethics, Government Accountability, and Campaign Reform Act of 1991, as amended. Specifically, political parties must ensure that those individuals filed an Statement of Economic Interests ("SEI") concurrent with their filing of an Statement of Intention of Candidacy ("SIC"). See S.C. Code Ann. § 8-13-1356(B) ("A candidate must file a statement of economic interests for the preceding calendar year at the same time and with the same official with whom the candidate files a declaration of candidacy.") (emphasis supplied). Moreover, "an officer authorized to receive declarations of candidacy ... may not accept a declaration of candidacy ... unless the declaration ... is accompanied by a statement of economic interests." S.C. Code § 8-13-1356(E) (emphasis supplied). If a candidate fails to file a statement of economic interests but the candidates name inadvertently appears on the ballot, "the officer **authorized to receive declarations of candidacy or petitions for nomination must not certify the candidate subsequent to the election.**" Id. (emphasis supplied).

3. As more fully shown in the Petition and Complaint filed contemporaneously herewith, and upon information and belief, numerous individuals seeking to be nominated as a candidate through political party primaries failed to file an SEI at the

same time and with the same official with whom they attempted to file their SIC. Specifically, these individuals did not file an SEI with the State Ethics Commission at all, or, at most, until some period of time after the filing of their SIC.

4. Because these individuals failed to file an SEI as required by S.C. Code Ann. § 8-13-1356(B), these individuals did not comply with the statutorily mandated methods of becoming candidates for office by political party primary and Respondents LCDP, LCRP, SCDP and SCRP were required by statute to refuse their SIC. Moreover, because these individuals were required to file an SEI concurrently with their SIC, but failed to do so, these individuals are not qualified or eligible to seek nomination by political party primary for the respective offices.

5. Notwithstanding the disqualification and ineligibility of these and other individuals to seek the nomination to be a candidate for these various offices, upon information and belief, the LCDP, the LCRP, the SCDP, the SCRP, and other county political parties accepted the deficient filings of these and other individuals and provided written certification to the State Commission or Lexington Commission that these individuals met the qualifications for the office for which the individual desired to file.

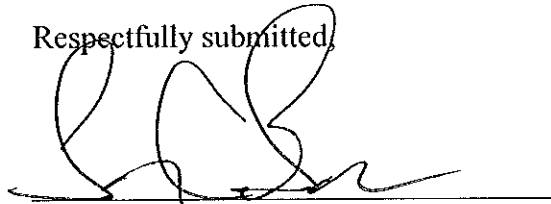
6. Consequently, as reflected in the Petition for Original Jurisdiction and Complaint filed contemporaneously with this motion, Plaintiffs seek, *inter alia*, a declaration individuals seeking nomination by political party primary to be a candidate for office who failed to file an SEI at the same time and with the same official with whom the individual filed an SIC are disqualified from appearing on the State Primary ballot and are ineligible to seek the nomination by political party primary to be a candidate for office.

7. This matter implicates the validity of this State's election process and, thus, is a matter of critical public importance. A timely resolution to this question is critical to ensuring the validity of the upcoming primary elections and ensuring the validity of the general election should one of these purported candidates prevail in a primary election and appear on the general election ballot.

8. Given that the primary elections will be held less than two months away, this matter involves questions of the utmost urgency. Delay in this Court's adjudication of the issue could be detrimental to the integrity of the mandated election process. Therefore, the Petitioners respectfully assert that such an important issue should be decided immediately by this State's highest court.

WHEREFORE, having fully set forth their motion, Plaintiffs-Petitioners move the Court to expedite its consideration by granting the Petition for Original Jurisdiction and scheduling an expedited schedule for responding to the Complaint and briefing this matter for argument, and further request that this Court grant to them such other and further relief as is just and proper.

Respectfully submitted,



WILLOUGHBY & HOEFER, P.A.

Tracey C. Green

Benjamin P. Mustian

Post Office Box 8416

Columbia, South Carolina 29202-8416

(803) 252-3300

*Attorneys for Plaintiffs Michael Anderson
and Robert G. Barber*

Columbia, South Carolina
April __, 2012

**THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT

Michael Anderson and Robert Barger, Plaintiffs-Petitioners,

v.

South Carolina State Election Commission; Marci Andino, as Executive Director and as a representative of the South Carolina State Election Commission; South Carolina Democratic Party; Richard A. Harpootlian, as Chair of the Executive Committee of and as a representative of the South Carolina Democratic Party; South Carolina Republican Party; Chad Connelly, as Chair of the Executive Committee of and as a representative of the South Carolina Republican Party; Lexington County Commission of Registration and Elections; Dean Crepes, as Director of and as a representative of the Lexington County Commission of Registration and Elections; Lexington County Democratic Party; Kathy Hensley, as Chair of and as a representative of the Lexington County Democratic Party; Lexington County Republican Party; Steven Isom, as Chair of and representative of the Executive Committee of the Lexington County Republican Party,Defendants-Respondents.

PETITION FOR ORIGINAL JURISDICTION

The above-named Petitioners submit this Petition for Original Jurisdiction pursuant to Article V, section 5, of the South Carolina Constitution, Section 14-3-310 of the South Carolina Code, and South Carolina Appellate Court Rule 245. A proposed Complaint is attached as Exhibit A and incorporated herein by reference. In accordance with Rule 245(a), this Petition is further supplemented by the Affidavits of Petitioners Michael

Anderson and Robert Barger and other referenced documents attached to the Complaint as Exhibits 1 through 15.

Introduction

As explained below and in the Complaint filed contemporaneously with this Petition, this controversy involves the pending certification of certain individuals seeking nomination by political party primary to become candidates for the South Carolina House of Representatives ("House of Representatives"), the South Carolina Senate ("Senate"), or a countywide office. The individuals identified herein as well as other individuals on both the state and county levels, attempted to declare as candidates but failed to file a Statement of Economic Interests form ("SEI") at the same time and with the same official with whom the individuals filed a declaration of candidacy or petition for nomination as required by S.C. Code Ann. § 8-13-1356(B). Consequently, these individuals did not comply with the filing requirements to become candidates seeking nomination to these offices in the party primary currently scheduled for June 12, 2012, and may not properly appear on the election ballots for the Democratic and Republican Primary Elections.

Petitioners assert that this matter is appropriate for consideration in this Court's original jurisdiction and that this Court should grant the petition and entertain this controversy in its original jurisdiction. This matter requires a determination of whether certain individuals have properly filed a Statement of Intention of Candidacy ("SIC"), including the required SEI, and, thus, whether those individuals properly may be candidates in the upcoming primary elections and appear on the ballot in the upcoming primary elections. This matter also involves application of the statutes enacted by the

General Assembly governing the process of filing for elections and appearing on the ballot for elections.

In short, this matter involves questions surrounding the integrity of this State's election process, which is a matter of serious public interest and concern. Moreover, given that the primary elections are scheduled for June 12, 2012, less than two months away, and that ballots are scheduled to be mailed not later than April 28, 2012,¹ this matter involves questions of the utmost urgency, requiring this Court's attention without further delay and an expedited briefing and argument schedule. Petitioners assert that the facts are not materially in dispute and, thus, that this Court's attention will not be required to resolve factual disputes but instead may be focused upon the application of two statutes governing the process for timely filing to become a candidate, sections 7-11-15 and 8-13-1356, and maintaining the integrity of this State's election process.

Support for Granting Petition

In support of this Petition, the Petitioners would respectfully show as follows:

1. Petitioner Michael Anderson is a resident and citizen of Lexington, South Carolina, and is qualified and registered to vote in the State primary election currently scheduled for June 12, 2012 ("State Primary"). By virtue of his residency, Petitioner Anderson is qualified to vote in the State Primary for those individuals seeking nomination to become candidates for offices in Lexington County, including the office of Lexington County Coroner.

2. Petitioner Robert G. Barger is a resident and citizen of Lexington, South Carolina, and is qualified and registered to vote in the State Primary. By virtue of his

¹ See <http://www.scvotes.org/files/2012%20ge%20calendar%20v4%20red.pdf>.

residency, Petitioner Barger is qualified to vote in the State Primary for those individuals seeking nomination to become candidates for House of Representatives District 88 and Senate Election District 23.

3. Respondent South Carolina Election Commission ("Commission") is an agency of the government of the State of South Carolina and an entity charged with carrying out the authority conferred upon it by the South Carolina Election Law, S.C. Code Ann. § 7-1-10, et seq.

4. Respondent Marci Andino is the duly appointed Executive Director and representative of the Commission.

5. Respondent South Carolina Democratic Party ("SCDP") is a political party certified by the Commission to nominate candidates for offices to be voted on in a general or special election and nominates candidates of that party on a regular basis by party primary.

6. Respondent Richard A. Harpootlian is the duly appointed or elected Chairman of the Executive Committee and a representative of the SCDP.

7. Respondent South Carolina Republican Party ("SCRП") is a political party certified by the Commission to nominate candidates for offices to be voted on in a general or special election and nominates candidates of that party on a regular basis by party primary.

8. Respondent Chad Connelly is the duly appointed or elected Chairman of the Executive Committee and a representative of the SCRП.

9. Respondent Lexington County Commission of Registration and Elections ("Lexington Commission") is an agency of the government of the State of South Carolina

and of Lexington County and is an entity charged with carrying out the authority conferred upon it by the South Carolina Election Law, S.C. Code Ann. § 7-1-10, et seq.

10. Respondent Dean Crepes is the duly appointed Executive Director and representative of the Lexington Commission.

11. Respondent Lexington County Democratic Party ("LCDP") is a county committee of SCDP.

12. Respondent Kathy Hensley is the duly appointed or elected Chairwoman of the Executive Committee and a representative of the LCDP.

13. Respondent Lexington County Republican Party ("LCRP") is a county committee of the SCRP.

14. Respondent Steven Isom is the duly appointed or elected Chairman of the Executive Committee and a representative of the LCRP.

15. The South Carolina requirements for filing to become a candidate nominated by a political party primary are clear. "In order to qualify as a candidate to run in the general election, all candidates seeking nomination by political party primary . . . must file a statement of intention of candidacy between noon on March sixteenth and noon on March thirtieth." S.C. Code Ann. § 7-11-15.

16. Although certain persons are exempt from the requirement to file statements of economic interests at the same time as their statement of intention of candidacy, see S.C. Code Ann. § 8-13-1356(A), (D), and (F),² candidates seeking nomination for the House of Representatives, Senate, or countywide office are required to file their statements of

² These are individuals who have current disclosure statements on file, who are seeking to become candidates other than by filing (e.g., petition candidates), or who file for office before January 1 of the year in which the election is held are subject to different requirements for filing a statement of economic interests.

intention of candidacy with the county executive committee of their respective party. S.C. Code Ann. § 7-11-15(2) & (3). Within five days of the receipt of the statements, but no later than 5:00 p.m. on March 30th, the county committees must transmit the statements of those individuals seeking nomination for the House of Representatives or Senate along with the applicable filing fees to the respective state executive committees. S.C. Code Ann. § 7-11-15(2).

17. No later than 12:00 noon on April 9th³ of each general election year, the state and county executive committees must provide to the Commission written certification of the names of all persons seeking the nomination by political party primary to become candidates. S.C. Code Ann. § 7-13-40. The political parties “must verify the qualifications of those candidates prior to certification to the [Commission] of the names of the candidates to be placed on primary ballots.” Id. Furthermore,

The written verification required by this section must contain a statement that each candidate certified meets . . . the qualifications for office for which he has filed. Political parties must not accept the filing of any candidate who does not . . . meet the qualifications for the office for which the candidate desires to file, and such candidate’s name shall not be placed on a primary ballot.

Id.

18. In considering whether individuals seeking to be nominated should be certified, political parties are also required to verify whether those individuals have complied with certain provisions of the South Carolina Ethics, Government Accountability, and Campaign Reform Act of 1991, as amended. Specifically, political parties must ensure that these individuals filed an SEI concurrent with their filing of an

³ If April 9th falls on a Saturday or Sunday, the state executive committee must certify the names of all candidates to be placed on the ballot no later than 12:00 noon on the following Monday. S.C. Code Ann. § 7-13-40.

SIC: “A candidate must file a statement of economic interests for the preceding calendar year at the same time and with the same official with whom the candidate files a declaration of candidacy.” S.C. Code Ann. § 8-13-1356(B) (emphasis supplied).⁴ Moreover, “an officer authorized to receive declarations of candidacy ... may not accept a declaration of candidacy ... unless the declaration ... is accompanied by a statement of economic interests.” S.C. Code § 8-13-1356(E) (emphasis supplied). If a candidate fails to file a statement of economic interests but the candidate's name inadvertently appears on the ballot, “the officer **authorized to receive declarations of candidacy or petitions for nomination** must not certify the candidate subsequent to the election.” Id. (emphasis supplied).

19. In addition to the clear statutory mandate, the State Election Commission, as well as the State Senate and House Ethics Committees, have made the requirement of contemporaneous filing of the statement of economic interests clear to the political parties, candidates, and the general public. The Commission advises that “Candidates must also file a Statement of Economic Interest (SEI) form with the State Ethics Commission. This must be done electronically on the State Ethics Commission website. A copy of the SEI receipt, or other proof of filing, is required to be submitted with your SIC form at the time of filing.” See State Election Commission website (http://www.scvotes.org/candidate_information/nomination_by_political_party). The House of Representatives and Senate Ethics Committees provide similar information.

⁴ Individuals seeking to become candidates must file their statement of economic interests form electronically for public disclosure on the website of the South Carolina Ethics Commission. See S.C. Code Ann. § 8-13-365 (“These disclosures and reports must be filed using an Internet-based filing system as prescribed by the commission.”); <http://ethics.sc.gov/StatementofEconomicInterests/Pages/index.aspx> (“Where are the forms submitted? All Statement of Economic Interests Forms must be filed electronically . . . Upon filing, the information is immediately available to the public through public reporting, also accessed in Quick Links.”).

See House of Representatives Ethics Committee website (<http://www.scstatehouse.gov/committeeinfo/houseethics.php>) (referencing information made available by the South Carolina State Ethics Commission pertaining to the ethical filing requirements of candidates); Senate Ethics Committee website (<http://www.scstatehouse.gov/CommitteeInfo/SenateEthics.php>) (same). Nevertheless, a number of candidates have been certified as candidates for the primary election without complying with these procedures.

20. George "Clay" Burkett is seeking the Republican nomination to become a candidate for Lexington County Coroner in the 2012 South Carolina General Election.

21. Upon information and belief, on or about March 26, 2012, Mr. Burkett filed an SIC with the LCRP to become a candidate for Lexington County Coroner in the 2012 South Carolina General Election by nomination through a political party. Upon information and belief, Mr. Burkett did not file an SEI at the same time and with the same official with whom he filed his SIC because he did not file an SEI with the State Ethics Commission until April 6, 2012.

22. In order to qualify as a candidate to run in the general election for District 88 of the House of Representatives, Walid Hakim is seeking to become the Democratic nominee by political party primary.

23. Upon information and belief, on or about March 29, 2012, Mr. Hakim filed an SIC with the LCDP to become a candidate for District 88 of the House of Representatives in the 2012 South Carolina General Election by nomination through a political party. However, upon information and belief, Mr. Hakim did not file an SEI at the same time and with the same official with whom he filed his SIC. In fact, upon information and belief,

Mr. Hakim has not filed an SEI with the LCDP or any other appropriate governing body to date.

24. Katrina F. Shealy is seeking the Republican nomination to become a candidate for District 23 of the Senate.

25. Upon information and belief, on or about March 16, 2012, Ms. Shealy filed an SIC with the LCRP to become a candidate for District 23 of the Senate in the 2012 South Carolina General Election by nomination through a political party. However, upon information and belief, Ms. Shealy did not file an SEI at the same time and with the same official with whom she filed her SIC because she did not file an SEI with the State Ethics Commission until April 12, 2012.

26. Upon information and belief, numerous other individuals seeking nomination to be candidates for office through the political primary process were required but failed to file an SEI at the same time and with the same official with whom the individual filed an SIC.

27. For example, upon information and belief, Jimmy D. McMillan is seeking the Republican nomination to become a candidate for District 36 of the House of Representatives in Spartanburg County. However, Mr. McMillan failed to file a statement of economic interests until April 16, 2012—16 days after the statutory close of the filing period set forth in S.C. Code Ann. § 7-11-15.

28. Similarly, upon information and belief, Larry H. Carter Center filed an SIC with the Charleston County Democratic Party on or about March 16, 2012 to seek the Democratic nomination to become a candidate for District 114 of the House of Representatives. Even so, upon information and belief, Mr. Carter Center did not file an

SEI at the same time and with the same official with whom he filed his SIC because he did not file an SEI with the State Ethics Commission until April 17, 2012—17 days after the statutory close of the filing period set forth in S.C. Code Ann. § 7-11-15.

29. These examples are illustrative, however, and there are other purported candidates who have not complied with the statutory requirements for becoming a candidate.

30. The statutory requirements for validly filing an SIC by these candidates required a contemporaneous, electronic filing of an SEI and submission of a copy of that form along with the SIC. However, upon information and belief, none of these purported candidates filed an SEI at the same time and with the same official with whom they attempted to file their SIC because they did not file an SEI with the State Ethics Commission until a date after the filing of their SIC.

31. Because these individuals were required but failed to file an SEI as required by S.C. Code Ann. § 8-13-1356(B), these individuals did not comply with the statutorily mandated methods of becoming candidates for office by political party primary and Respondents LCDP, LCRP, SCDP and SCRP were required by statute to refuse their SIC. Moreover, because these individuals were required to file an SEI concurrently with their SIC, but failed to do so, these individuals are not qualified or eligible to seek nomination by political party primary for the respective offices and are not qualified as candidates to run in the general election.

32. Notwithstanding the disqualification and ineligibility of these and other individuals to seek the nomination to be a candidate for these various offices, upon information and belief, the LCDP, the LCRP, the SCDP, the SCRP, and other county

political parties accepted the deficient filings of these and other individuals and provided written certification to the State Commission or Lexington Commission that these individuals met the qualifications for the office for which the individual desired to file.

33. Notwithstanding the disqualification and ineligibility of these and other individuals to seek the nomination to be a candidate for these various offices, upon information and belief, the Commission or the Lexington Commission accepted the written certifications from the LCDP, the LCRP, the SCDP, the SCRP, and other county political parties certifying that these individuals met the filing requirements for which the individual desired to file.

34. By letter dated April 16, 2012, Plaintiff Anderson requested that the Commission, the SCDP, and the SCRP refuse or, if necessary, remove the individuals identified above who are seeking the nomination to be candidates for office through political party primaries and who were required, but failed, to file an SEI at the same time and with the same official with whom they filed an SIC. By letter dated April 18, 2012, the Commission responded stating that it is not given the authority to determine if a candidate certified by a political party meets the qualifications to hold office or if the candidate completed the filing process properly. To date, neither the SCDP nor the SCRP has provided any response.

35. Upon information and belief, the State Commission, the Lexington Commission, and other county election commissions throughout South Carolina are in the process of formulating ballots which will include the name of these and other individuals who required but failed to file an SEI at the same time and with the same official with whom they filed their SIC.

36. This matter implicates the validity of this State's election process and, thus, is a matter of critical public importance. A timely resolution to this question is critical to ensuring the validity of the upcoming primary elections and ensuring the validity of the general election should one of these purported candidates prevail in a primary election and appear on the general election ballot.

37. The Petitioners respectfully assert that such an important issue should be decided immediately by this State's highest court. Delay in this Court's adjudication of the issue could be detrimental to the integrity of the mandated election process.

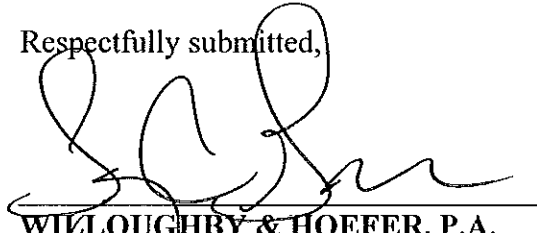
38. The Petitioners submit that this Petition, and the complaint submitted contemporaneously with this Petition pursuant to Rule 245(c) raise an issue of significant public interest which is appropriate for adjudication by this Court in its original jurisdiction for the following reasons:

- a. Resolution of this claim in this Court will provide needed guidance not only to the Petitioners and Respondents but to all county election parties and officials.
- b. Resolution of this claim also will ensure the integrity of and public confidence in this state's election process.
- c. This claim involves application of this state's election statutes to facts that Petitioners do not believe will be materially in dispute—the failure to properly file a complete SIC including an SEI and the legal ramifications and duties resulting from that failure.

In support of the this Petition, the Petitioners submit herewith a complaint and the notice to Respondent as required by Rule 245(c), SCACR, and incorporate by reference the supporting affidavits of Michael Anderson and Robert Barger and exhibits attached to the complaint as Exhibits 1 through 15.

WHEREFORE, having fully set forth their Petition, the Petitioners respectfully request that this Court grant the within Petition.

Respectfully submitted,



WILLOUGHBY & HOEFER, P.A.
Tracey C. Green
Benjamin P. Mustian
Post Office Box 8416
Columbia, South Carolina 29202-8416
(803) 252-3300

*Attorneys for Petitioners Michael Anderson
and Robert G. Barger*

Columbia, South Carolina
April 18, 2012

PETITION

EXHIBIT A

**THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT

Michael Anderson and Robert Barger, Plaintiffs-Petitioners,

v.

South Carolina State Election Commission; Marci Andino, as Executive Director and as a representative of the South Carolina State Election Commission; South Carolina Democratic Party; Richard A. Harpootlian, as Chair of the Executive Committee of and as a representative of the South Carolina Democratic Party; South Carolina Republican Party; Chad Connelly, as Chair of the Executive Committee of and as a representative of the South Carolina Republican Party; Lexington County Commission of Registration and Elections; Dean Crepes, as Director of and as a representative of the Lexington County Commission of Registration and Elections; Lexington County Democratic Party; Kathy Hensley, as Chair of and as a representative of the Lexington County Democratic Party; Lexington County Republican Party; Steven Isom, as Chair of and representative of the Executive Committee of the Lexington County Republican Party,Defendants-Respondents.

**COMPLAINT
FOR DECLARATORY AND INJUNCTIVE RELIEF**

The Plaintiffs come before this Honorable Court and would show as follows:

NATURE OF THE CASE

1. This action involves the pending certification of certain individuals seeking nomination by political party primary to become candidates for the South Carolina House of Representatives ("House of Representatives"), the South Carolina

Senate ("Senate") or a countywide office. The individuals identified herein were required but failed to file a Statement of Economic Interests form ("SEI") at the same time and with the same official with whom the individuals filed a declaration of candidacy for nomination as required by S.C. Code Ann. § 8-13-1356(B). Consequently, these individuals did not comply with the filing requirements to become candidates for the general election by seeking nomination to these offices in the party primary currently scheduled for June 12, 2012.

2. Through this Complaint, Plaintiffs seek (a) a declaration that individuals who are not exempt under subsections 8-13-1356(A), (D), & (F) and are seeking nomination by political party primary to be a candidate for office must file an SEI at the same time and with the same official with whom the individuals filed a Statement of Intention of Candidacy form ("SIC"); (b) a declaration that an officer authorized to receive declarations of candidacy for nominations under the provisions of Chapter 11 of Title 7 of the South Carolina Code may not accept an SIC unless the declaration is accompanied by a contemporaneous filing of an SEI or proof of filing of an SEI; (c) a declaration that individuals who were required but failed to file an SEI at the same time and with the same official with whom the individual filed an SIC did not timely file an SIC, should not be certified as a candidate to appear on the State Primary Election ballot or the State General Election ballot, are ineligible to seek the nomination by political party primary to be a candidate for that office, and are not qualified as a candidate to run in the general election for that office.

PARTIES

Plaintiffs

3. Plaintiff Michael Anderson is a resident and citizen of Lexington, South Carolina, and is qualified and registered to vote in the State primary election currently scheduled for June 12, 2012 ("State Primary"). By virtue of his residence, Plaintiff Anderson is qualified to vote in the State Primary for those individuals seeking nomination to become candidates for offices in Lexington County, including the office of Lexington County Coroner. See Affidavit of Michael Anderson (attached as Exhibit 1).

4. Plaintiff Robert G. Barger is a resident and citizen of Lexington, South Carolina, and is qualified and registered to vote in the State Primary. By virtue of his residence, Plaintiff Barger is qualified to vote in the State Primary for those individuals seeking nomination to become candidates for House of Representatives District 88 and Senate Election District 23. See Affidavit of Robert Barger (attached as Exhibit 2).

Defendants

5. Defendant South Carolina Election Commission ("Commission") is an agency of the government of the State of South Carolina and an entity charged with carrying out the authority conferred upon it by the South Carolina Election Law, S.C. Code Ann. § 7-1-10, et seq.

6. Defendant Marci Andino is the duly appointed Executive Director and representative of the Election Commission.

7. Defendant South Carolina Democratic Party ("SCDP") is a political party certified by the Commission to nominate candidates for offices to be voted on in a general or special election and nominates candidates of that party on a regular basis.

8. Defendant Richard A. Harpootlian is the duly appointed or elected Chairman of the Executive Committee and a representative of the SCDP.

9. Defendant South Carolina Republican Party ("SCRП") is a political party certified by the Commission to nominate candidates for offices to be voted on in a general or special election and nominates candidates of that party on a regular basis.

10. Defendant Chad Connelly is the duly appointed or elected Chairman of the Executive Committee and a representative of the SCRП.

11. Defendant Lexington County Commission of Registration and Elections ("Lexington Commission") is an agency of the government of the State of South Carolina and an entity charged with carrying out the authority conferred upon it by the South Carolina Election Law, S.C. Code Ann. § 7-1-10, et seq.

12. Defendant Dean Crepes is the duly appointed Executive Director and representative of the Lexington Commission.

13. Defendant Lexington County Democratic Party ("LCDP") is a county committee of the SCDP.

14. Defendant Kathy Hensley is the duly appointed or elected Chairwoman of the Executive Committee and a representative of the LCDP.

15. Defendant Lexington County Republican Party ("LCRP") is a county committee of the SCRП.

16. Defendant Steven Isom is the duly appointed or elected Chairman of the Executive Committee and a representative of Defendant LCRP.

JURISDICTION

17. This Court has jurisdiction over the parties and the causes of action asserted by Plaintiffs pursuant to its original jurisdiction under South Carolina Appellate Court Rule 245, S.C. Code Ann. § 14-3-310 (1976), and S.C. Const. art. V, § 5.

18. This Court also has jurisdiction of this case pursuant to the Uniform Declaratory Judgments Act, S.C. Code Ann. § 15-53-10 et seq. (1976, as amended) and its equitable powers.

STATUTORY BACKGROUND

19. The South Carolina requirements for filing to become a candidate nominated by a political party are clear. "In order to qualify as a candidate to run in the general election, all candidates seeking nomination by political party primary . . . must file a statement of intention of candidacy between noon on March sixteenth and noon on March thirtieth." S.C. Code Ann. § 7-11-15.

20. Although certain persons are exempt from the requirement to file statements of economic interests at the same time as their statement of intention of candidacy, see S.C. Code Ann. § 8-13-1356(A), (D), and (F),¹ candidates seeking nomination for the House of Representatives, Senate or countywide office are required to file their statements of intention of candidacy with the county executive committee of their respective party. S.C. Code Ann. § 7-11-15(2) & (3). Within five days of the receipt of the statements, but no later than 5:00 p.m. on March 30th, the county committees must transmit the statements of those individuals seeking nomination for the

¹ These are individuals who have current disclosure statements on file, who are seeking to become candidates other than by filing (e.g., petition candidates), or who file for office before January 1 of the year in which the election is held are subject to different requirements for filing a statement of economic interests.

State House of Representatives or Senate along with the applicable filing fees to the respective state executive committees. S.C. Code Ann. § 7-11-15(2).

21. No later than 12:00 noon on April 9th ² of each general election year, the state and county executive committees must provide to the Commission written certification of the names of all persons seeking the nomination by political party primary to become candidates. S.C. Code Ann. § 7-13-40. The political parties “must verify the qualifications of those candidates prior to certification to the [Commission] of the names of the candidates to be placed on primary ballots.” Id. Furthermore,

The written verification required by this section must contain a statement that each candidate certified meets . . . the qualifications for office for which he has filed. Political parties must not accept the filing of any candidate who does not . . . meet the qualifications for the office for which the candidate desires to file, and such candidate’s name shall not be placed on a primary ballot.

Id.

22. In considering whether individuals seeking to be nominated should be certified, political parties are also required to verify whether those individuals have complied with certain provisions of the South Carolina Ethics, Government Accountability, and Campaign Reform Act of 1991, as amended. Specifically, political parties must ensure that these individuals filed an SEI concurrent with their filing of an SIC: “A candidate must file a statement of economic interests for the preceding calendar year at the same time and with the same official with whom the candidate files a declaration of candidacy.” S.C. Code Ann. § 8-13-1356(B) (emphasis supplied).³

² If April 9th falls on a Saturday or Sunday, the state and county executive committees must certify the names of all candidates to be placed on the ballot no later than 12:00 noon on the following Monday. S.C. Code Ann. § 7-13-40.

³ Individuals seeking to become candidates must file their statement of economic interests form electronically for public disclosure on the website of the South Carolina Ethics Commission. See S.C. Code Ann. § 8-13-365 (“These disclosures and reports must be filed using an Internet-

Moreover, “an officer authorized to receive declarations of candidacy ... may not accept a declaration of candidacy ... unless the declaration ... is accompanied by a statement of economic interests.” S.C. Code § 8-13-1356(E) (emphasis supplied). If a candidate fails to file a statement of economic interests but the candidate's name inadvertently appears on the ballot, “the officer authorized to receive declarations of candidacy or petitions for nomination must not certify the candidate subsequent to the election.” *Id.* (emphasis supplied).

23. In addition to the clear statutory mandate, the State Election Commission, as well as the State Senate and House Ethics Committees, have made the requirement of contemporaneous filing of the statement of economic interests clear to the political parties, candidates, and the general public. The Commission advises that “Candidates must also file a Statement of Economic Interest (SEI) form with the State Ethics Commission. This must be done electronically on the State Ethics Commission website. A copy of the SEI receipt, or other proof of filing, is required to be submitted with your SIC form at the time of filing.” *See* State Election Commission website (http://www.scvotes.org/candidate_information/nomination_by_political_party). The House of Representatives and Senate Ethics Committees provide similar information. *See* House of Representatives Ethics Committee website (<http://www.scstatehouse.gov/committeeinfo/houseethics.php>) (referencing information made available by the South Carolina State Ethics Commission pertaining to the ethical filing requirements of candidates); Senate Ethics Committee website (<http://www.scstatehouse.gov/CommitteeInfo/SenateEthics.php>) (same).

based filing system as prescribed by the commission.”); <http://ethics.sc.gov/StatementofEconomicInterests/Pages/index.aspx> (“Where are the forms submitted? All Statement of Economic Interests Forms must be filed electronically . . . Upon filing, the information is immediately available to the public through public reporting, also accessed in Quick Links.”).

FACTS

24. George "Clay" Burkett is seeking the Republican nomination to become a candidate for Lexington County Coroner in the 2012 South Carolina General Election. See Lexington County Republican Party website, Candidate Filing Report, March 26, 2012 (available at <http://www.lexingtongop.com/lcrp-info/candidatefiling2012/thurmarch262012filings> and attached as Exhibit 4).

25. Upon information and belief, on or about March 26, 2012, Mr. Burkett filed an SIC with the LCRP to become a candidate for Lexington County Coroner in the 2012 South Carolina General Election by nomination through a political party in the State Primary. See Gregory C. Burkett Campaign Disclosure dated April 10, 2012, Expenditures (available on the South Carolina State Ethics Commission Public Disclosure and Accountability Reporting website (<http://apps.sc.gov/PublicReporting/Index.aspx>) and attached as Exhibit 5). Upon information and belief, Mr. Burkett did not file an SEI at the same time and with the same official with whom he filed his SIC because he did not file an SEI with the State Ethics Commission until April 6, 2012. See South Carolina State Ethics Commission Candidate Summary Page for Gregory C. Burkett (attached as Exhibit 6).

26. In order to qualify as a candidate to run in the general election for District 88 of the House of Representatives, Walid Hakim is seeking to become the Democratic nominee by political party primary. See South Carolina Democratic Party Candidate Filing Report (available online at <https://docs.google.com/spreadsheet/ccc?key=0Aq6bWAPKZ0LGdG95QWIZYVJfODJKd3VITelmbXBXMgc#gid=1> and attached as Exhibit 7)

27. Upon information and belief, on or about March 29, 2012, Mr. Hakim filed an SIC with the LCDP to become a candidate for District 88 of the House of Representatives in the 2012 South Carolina General Election by nomination through a political party in the State Primary. See Exhibit 8. However, upon information and belief, Mr. Hakim did not file an SEI at the same time and with the same official with whom he filed his SIC. In fact, upon information and belief, Mr. Hakim has not filed an SEI with the LCDP or any other appropriate governing body to date. See South Carolina State Ethics Commission Candidate Summary Page for Walid Hakim (attached as Exhibit 8).

28. Katrina F. Shealy is seeking the Republican nomination to become a candidate for District 23 of the Senate. See Lexington County Republican Party website, Candidate Filing Report, March 16, 2012 (available at <http://www.lexingtongop.com/lcrp-info/candidatefiling2012/thurmarch262012filings> and attached as Exhibit 9).

29. Upon information and belief, on or about March 16, 2012, Ms. Shealy filed an SIC with the LCRP to become a candidate for District 23 of the South Carolina Senate in the 2012 South Carolina General Election by nomination through a political party in the State Primary. See Katrina F. Shealy Campaign Disclosure dated April 10, 2012, Expenditures (available on the South Carolina State Ethics Commission Public Disclosure and Accountability Reporting website (<http://apps.sc.gov/PublicReporting/Index.aspx>) and attached as Exhibit 10). However, upon information and belief, Ms. Shealy did not file an SEI at the same time and with the same official with whom she filed her SIC because she did not file an SEI with the State Ethics Commission until April 12, 2012. See South Carolina State Ethics Commission Candidate Summary Page for Katrina F. Shealy (attached as Exhibit 11).

30. Upon information and belief, numerous other individuals seeking nomination to be candidates for office through the political primary process failed to file an SEI at the same time and with the same official with whom the individual filed an SIC.

31. For example, upon information and belief, Jimmy D. McMillan is seeking the Republican nomination to become a candidate for District 36 of the House of Representatives in Spartanburg County. See South Carolina State Ethics Commission Candidate Summary Page for Jimmy D. McMillan (attached as Exhibit 12). However, Mr. McMillan failed to file a statement of economic interests until April 16, 2012—16 days after the statutory close of the filing period set forth in S.C. Code Ann. § 7-11-15. Id.

32. Similarly, upon information and belief, Larry H. Carter Center filed an SIC with the Charleston County Democratic Party on or about March 16, 2012 to seek the Democratic nomination to become a candidate for District 114 of the House of Representatives. See Exhibit 7. Even so, upon information and belief, Mr. Carter Center did not file an SEI at the same time and with the same official with whom he filed his SIC because he did not file an SEI with the State Ethics Commission until April 17, 2012—17 days after the statutory close of the filing period set forth in S.C. Code Ann. § 7-11-15. See South Carolina State Ethics Commission Candidate Summary Page for Larry H. Carter Center (attached as Exhibit 13).

33. These examples are illustrative, however, and there are other purported candidates who have not complied with the statutory requirements for becoming a candidate.

34. The statutory requirements for validly filing an SIC by these candidates required a contemporaneous, electronic filing of an SEI and submission of a copy of that

form along with the SIC. However, upon information and belief, none of these purported candidates filed an SEI at the same time and with the same official with whom they attempted to file their SIC.

35. Because these individuals failed to file an SEI as required by S.C. Code Ann. § 8-13-1356(B), the LCDP, LCRP, SCDP and SCRP were required by statute to refuse their SIC.

36. Because these individuals failed to file an SEI as required by S.C. Code Ann. § 8-13-1356(B), these individuals did not comply with the statutorily mandated methods of becoming candidates for office by political party primary.

37. By virtue of the fact that these individuals were required to file an SEI concurrently with their SIC, but failed to do so, these individuals are not qualified or eligible to seek nomination by political party primary for the respective offices and are not qualified as candidates to run in the general election.

UNLAWFUL ACTIONS BY THE DEFENDANTS

38. Notwithstanding the disqualification and ineligibility of these and other individuals to seek the nomination to be a candidate for these various offices, upon information and belief, the LCDP, the LCRP, the SCDP, the SCRP, and other county political parties accepted the deficient filings of these and other individuals and provided written certification to the Commission or Lexington Commission that these individuals met the qualifications for the office for which the individual desired to file.

39. Notwithstanding the disqualification and ineligibility of these and other individuals to seek the nomination to be a candidate for these various offices, upon information and belief, the State Commission or the Lexington Commission accepted the written certifications from the LCDP, the LCRP, the SCDP, the SCRP, and other county

political parties certifying that these individuals met the qualifications for the office for which the individual desired to file.

40. By letter dated April 16, 2012, Plaintiff Anderson requested that the Commission, the SCDP, and the SCRP refuse or, if necessary, remove the individuals identified above who are seeking the nomination to be candidates for office through political party primaries and who were required, but failed, to file an SEI at the same time and with the same official with whom they filed an SIC. See Letter from Tracey C. Green dated April 16, 2012 (attached as Exhibit 14). By letter dated April 18, 2012, the Commission responded stating that it is not given the authority to determine if a candidate certified by a political party meets the qualifications to hold office or if the candidate completed the filing process properly. See Letter from Marci Andino dated April 18, 2012 (attached as Exhibit 15). To date, neither the SCDP nor the SCRP has provided any response to Plaintiff Anderson.

41. Upon information and belief, the State Commission, the Lexington Commission, and other county election commissions throughout South Carolina are in the process of formulating ballots which will include the name of these and other individuals who failed to file an SEI at the same time and with the same official with whom they filed their SIC.

FOR A FIRST CAUSE OF ACTION
(Declaratory Relief)

42. Each and every allegation contained in the preceding paragraphs is realleged and reasserted as if set forth verbatim herein.

43. Plaintiffs seek a declaration that George "Clay" Burkett, Walid Hakim, and Katrina F. Shealy did not comply with the statutory procedure for becoming a candidate; were improperly certified as candidates by the LCRP, LCDP, SCRP, or SCDP,

as applicable; may not appear on the ballot for the primary election presently scheduled for June 12, 2012, and are not qualified as candidates to run in the general election.

44. Plaintiffs further seek a declaration from the Court that all individuals, not exempted by subsection 8-13-1356(A), (D), & (F), seeking nomination by political party primary to be a candidate for office must file an SEI at the same time and with the same official with whom the individuals filed an SIC.

45. Plaintiffs further seek a declaration from the Court that an officer authorized to receive declarations of candidacy for nominations under the provisions of Chapter 11 of Title 7 of the South Carolina Code may not accept an SIC from an individual seeking nomination by political party primary to be a candidate for office unless the declaration or petition is accompanied by an SEI or proof of a filing of an SEI.

46. Plaintiffs further seek a declaration that individuals seeking nomination by political party primary to be a candidate for office who were required but failed to file an SEI at the same time and with the same official with whom the individual filed an SIC did not timely file an SIC, should not appear on the State Primary ballot, are ineligible to seek the nomination by political party primary to be a candidate for office, and are not qualified as candidates to run in the general election.

47. Plaintiffs further seek a declaration that the LCDP, LCRP, SCDP and SCRP unlawfully certified as candidates individuals seeking nomination by political party primary to be a candidate for office who were required but failed to file an SEI at the same time and with the same official with whom the individual filed an SIC.

FOR A SECOND CAUSE OF ACTION
(Injunctive Relief)

48. Each and every allegation contained in the preceding paragraphs is realleged and reasserted as if set forth verbatim herein.

49. The LCDP, LCRP, SCDP and SCRP, and other county political parties failed to comply with South Carolina's ethics and election laws by certifying to the Commission as candidates individuals seeking nomination by political party primary to be a candidate for office who were required but failed to file an SEI at the same time and with the same official with whom the individual filed an SIC.

50. By certifying as candidates individuals seeking nomination by political party primary to be a candidate for office who were required but failed to file an SEI at the same time and with the same official with whom the individual filed an SIC, the LCDP, LCRP, SCDP, and SCRP and other political parties have enabled individuals who did not timely file an SIC and thus are unqualified and ineligible to seek such nomination to be listed on the election ballot for the 2012 State Primary or to be qualified as a candidate to run in the general election.

51. If the Commission is permitted to approve, prepare, print, and provide to qualified voters election ballots listing the names of individuals who failed to file an SEI at the same time and with the same official with whom the individual filed an SIC, Plaintiffs will suffer significant and irreparable harm in that Plaintiffs will be required to participate in party primaries seeking to nominate individuals who are unqualified and ineligible to seek nomination by political party primary to be a candidate for office, who cannot be certified as the nominee, or who are not qualified as a candidate to run in the general election.

52. As a result, Plaintiffs further seek an order enjoining the Defendants from taking any further action to approve, prepare, print, or provide election ballots and from certifying, approving, printing, or distributing any 2012 primary ballots that list the names of individuals who were required but failed to file an SEI at the same time and with the same official with whom the individual filed an SIC.

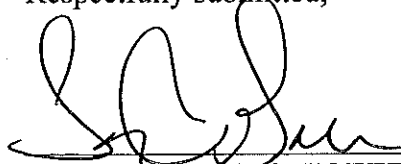
PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendants, providing the following relief:

- (a) For a declaratory judgment as set forth above;
- (b) That the Court enter an order enjoining the Defendants from taking any further action to print election ballots which list the names of individuals who were required but failed to file an SEI at the same time and with the same official with whom the individual filed an SIC;
- (c) That the Court enter an Order enjoining the Defendants from certifying, approving, printing or distributing any 2012 ballots that list the names of individuals who were required but failed to file a SEI at the same time and with the same official with whom the individual filed a SIC; and
- (d) Such other and further relief as this Court deems just and proper.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,



WILLOUGHBY & HOEFER, P.A.

Tracey C. Green

Benjamin P. Mustian

Post Office Box 8416

Columbia, South Carolina 29202-8416

(803) 252-3300

*Attorneys for Plaintiffs Michael Anderson
and Robert G. Barger*

Columbia, South Carolina
April 18, 2012

COMPLAINT

EXHIBIT 1

**THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT

Michael Anderson and Robert Barger, Plaintiffs-Petitioners,

v.

South Carolina State Election Commission; Marci Andino, as Executive Director and as a representative of the South Carolina State Election Commission; South Carolina Democratic Party; Richard A. Harpootlian, as Chair of the Executive Committee of and as a representative of the South Carolina Democratic Party; South Carolina Republican Party; Chad Connelly, as Chair of the Executive Committee of and as a representative of the South Carolina Republican Party; Lexington County Commission of Registration and Elections; Dean Crepes, as Director of and as a representative of the Lexington County Commission of Registration and Elections; Lexington County Democratic Party; Kathy Hensley, as Chair of and as a representative of the Lexington County Democratic Party; Lexington County Republican Party; Steven Isom, as Chair of and representative of the Executive Committee of the Lexington County Republican Party,Defendants-Respondents.

AFFIDAVIT OF MICHAEL ANDERSON

Personally appeared before me the undersigned who, being first duly sworn,
deposes and says:

1. I am over eighteen (18) years of age and of sound mind.
2. I am a resident of Lexington County.

3. I am a registered voter and am qualified to vote in the 2012 South Carolina primary election scheduled for June 12, 2012.

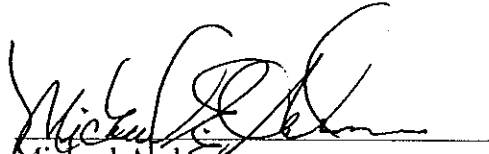
4. By virtue of my residency, I am qualified to vote in the State Primary for those individuals seeking nomination to become candidates for offices in Lexington County, including the office of Lexington County Coroner.

5. I intend to vote in the 2012 State Primary Election and in the General Election.

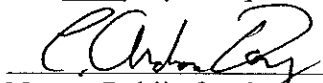
6. I have reviewed the grounds set forth in the Petition for Original Jurisdiction and Complaint and to the best of my knowledge, the allegations are true and grounds exist for this Court to exercise its original jurisdiction.

FURTHER AFFIANT SAYETH NOT.

This 18th day of April, 2012.


Michael Anderson

Sworn to and subscribed before me,
this 18th day of April, 2012


Notary Public for the State of South Carolina
My Commission expires: 01/12/2020

COMPLAINT

EXHIBIT 2

**THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT

Michael Anderson and Robert Barger, Plaintiffs-Petitioners,

v.

South Carolina State Election Commission; Marci Andino, as Executive Director and as a representative of the South Carolina State Election Commission; South Carolina Democratic Party; Richard A. Harpootlian, as Chair of the Executive Committee of and as a representative of the South Carolina Democratic Party; South Carolina Republican Party; Chad Connelly, as Chair of the Executive Committee of and as a representative of the South Carolina Republican Party; Lexington County Commission of Registration and Elections; Dean Crepes, as Director of and as a representative of the Lexington County Commission of Registration and Elections; Lexington County Democratic Party; Kathy Hensley, as Chair of and as a representative of the Lexington County Democratic Party; Lexington County Republican Party; Steven Isom, as Chair of and representative of the Executive Committee of the Lexington County Republican Party,Defendants-Respondents.

AFFIDAVIT OF ROBERT G. BARGER

Personally appeared before me the undersigned who, being first duly sworn,
deposes and says:

1. I am over eighteen (18) years of age and of sound mind.
2. I am a resident of Lexington County.

3. I am a registered voter and am qualified to vote in the 2012 South Carolina primary election scheduled for June 12, 2012.

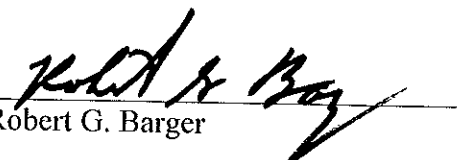
4. By virtue of my residency, I am qualified to vote in the State Primary for those individuals seeking nomination to become candidates for House of Representatives District 88 and Senate Election District 23.

5. I intend to vote in the 2012 State Primary Election and the General Election.

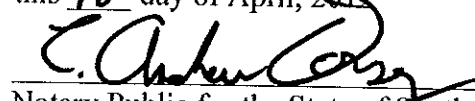
6. I have reviewed the grounds set forth in the Petition for Original Jurisdiction and Complaint and to the best of my knowledge, the allegations are true and grounds exist for this Court to exercise its original jurisdiction.

FURTHER AFFIANT SAYETH NOT.

This 18 day of April, 2012.


Robert G. Barger

Sworn to and subscribed before me,
this 18th day of April, 2012


Notary Public for the State of South Carolina
My Commission expires: 01/12/2020

COMPLAINT

EXHIBIT 3

EVERY VOTE MATTERS.
EVERY VOTE COUNTS.

Carolina State Election Commission

Voters
Elections
Results & Statistics
Poll Workers
General
Candidates
Media
About

Twitter & Facebook

FOLLOW US ON **twitter**



Download Brochures



Syndicate



Search

Search

Quick Link

[Site Map](#)

You are here: [Home](#) » [Candidate Information](#) »
Nomination By Political Party

Nomination by Political Party

All candidates, except President, seeking a political party's nomination to run in a general or special election must file a [Statement of Intention of Candidacy \(SIC\) form](#) with the appropriate party official during the appropriate filing period. [Click here for information on Filing for President.](#)

Candidates must also file a Statement of Economic Interest (SEI) form with the State Ethics Commission. This must be done electronically on the [State Ethics Commission website](#). A copy of the SEI receipt, or other proof of filing, is required to be submitted with your SIC form at the time of filing. Candidates may also be required to make Campaign Disclosure reports. Visit the State Ethics Commission website for more information.

Candidates for federal office, statewide office, and solicitor must file with the state executive committee of the political party of the candidate's choice. Candidates for State Senate, State House of Representatives, countywide office, and less-than-countywide office must file with the executive committee of the county political party in the candidate's county of residence.

The filing period for the General Election opens at noon on March 16th of the election year and closes at noon on March 30th of the election year.

Names of candidates who fail to file the proper forms during the appropriate filing period will not appear on the ballot.

2012 Election Dates

Republican Presidential Primary
January 21, 2012

State Primaries
June 12, 2012

State Primary Runoffs
June 26, 2012

General Election
November 6, 2012

2012 General Election Candidate Filing

Partisan Candidate Filing Period
Noon, March 16, 2012 -
Noon, March 30, 2012

**Petition Candidate Filing
Deadline**
Noon, July 16, 2012

[Additional Candidate Filing
Information](#)

Candidates who file with the Republican or Democratic parties must pay a filing fee. The filing fee is one percent of the annual salary of the office multiplied by the number of years in the term of office or \$100, whichever is greater. This fee is applied to funding the party's primary.

2012 Primary Filing Fees

2010 Primary Filing Fees

Contact the appropriate political party for specific information regarding filing.

If only one candidate files for a particular office with a particular party, that candidate becomes the party's nominee. When more than one candidate files for a particular office with a particular party, the nominee is chosen by primary or convention.

The Democratic and Republican parties nominate candidates by primary. Primaries to nominate candidates for the General Election are held on the second Tuesday in June. Candidates must receive a majority of votes to be nominated. If no candidate receives a majority of votes for a particular office, a primary runoff between the top two candidates is held two weeks later. Primaries and runoffs are conducted by the State and county election commissions.

The Constitution, Green, Independence, Labor, Libertarian, United Citizens, and Working Families parties nominate candidates by convention. Conventions are conducted by the parties. Contact the appropriate party for more information regarding conventions.

A candidate may be nominated by more than one political party. Such candidates are commonly referred to as "fusion candidates." Click here for information regarding candidates representing more than one party.

Names of candidates who were defeated in a political party primary or convention may not appear on the ensuing general or special election ballot (S.C. Code of Laws Section 7-11-10).

Special Elections

Special elections are non-scheduled elections held at various times to fill vacancies created by death, resignation or removal from office.

The filing period for special elections opens at noon on the third Friday after the vacancy occurs and closes at noon, 10 days later.

If necessary, a primary is held on the 11th Tuesday after the vacancy occurs. If necessary, a primary runoff is held on the 13th Tuesday after the vacancy occurs. The special election is held on the 18th Tuesday after the vacancy occurs.

Partisan Municipal Elections

Filing rules for partisan municipal elections vary. Check with your local party or municipal or county election commission for specific requirements.

[< Candidate Information](#) [up Nomination by Petition >](#)

[printer-friendly version](#) |

All logos and trademarks in this site are property of their respective owner.
© 2004-2007 by the [South Carolina State Election Commission](#)

SOUTH CAROLINA
ELECTION COMMISSION

SOE VALID **WAI 1 VALID** **XHTML VALID** **OSS VALID**

[Disclaimer](#) : [Privacy](#)

COMPLAINT

EXHIBIT 4

Wednesday, 18 April 2012



Lexington County Republican Party

Republican Adherence Committee(RAC)
Gary Taylor, Chairman David James, V.Chair,
New Members: Lee Canaday, Jim Wellman

[Home](#) [LCRP Info](#) [Voter Info](#) [Links](#) [Calendar](#) [Get Involved](#) [Photos](#) [Contact Us](#)

Lexington GOP Calendar

« < April 2012 > »						
S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	1	2	3	4	5

Candidate Filing March 26 2012



The Lexington County Republican Party candidate filing began today at 9AM-1PM and is scheduled to end Friday March 30th at 12 noon.

As of 1PM this afternoon 2 candidates filed for office with the Lexington County Republican Party. Total candidates filing for office now stands at 34.

In order of filing:

1. Clay Burkett (Office: Lexington County Coroner)
2. Dan Gregory (Office: Lexington County Reg. of Mesne Conveyance)

As always if you have any questions you can reach me at 803.422.4245

Sincerely,

Steve Isom, Chairman
Lexington County Republican Party
PO Box 1346
Lexington, SC 29071
803.422.4245

UNITED STATES COPYRIGHT © 2012 Lexington County Republican Party ALL RIGHTS RESERVED

COMPLAINT

EXHIBIT 5

SC.GOV - SC State Ethics Commission: Public Disclosure and Accountability Reporting

Individual Reports

Candidate Campaign Disclosure

2012, Pre-Election Report

[DOWNLOAD CSV FILE](#)

Candidate: burkett, gregory c
Position Sought: Coroner
District/Locale: Lexington
Election Type: Primary
Election Date: 06/12/2012
Filing Type: Original
Filing Date: 04/10/2012

Select a tab to view more.

[Summary](#)
[Contributions](#)
[Expenditures](#)
[Loans](#)
[Loan Payments](#)
[Assets](#)

Date	Vendor	Address	Descri
03/27/2012	Website Dynamics	P.O. Box 12043 Vancouver, CA V6B 4N4	website
03/26/2012	BB&T	PO Box 819 Wilson, NC 27894	bank fer
03/26/2012	Lexington GOP	PO Box 1346 Lexington, SC 29071	Filing fe
03/04/2012	Office Depot	5432 Sunset Blvd Lexington, SC 29072	Office Supplies
02/29/2012	Website Dynamics	P.O. Box 12043 Vancouver, CA V6B 4N4	Website
02/29/2012	WalMart	Hwy 23 Batesburg, SC 29006	Office Supplies
02/25/2012	WalMart	Hwy 23 Batesburg, SC 29006	Paper Product Fund-R
02/20/2012	B & L Senior Center	316 Tall Timbers Dr Leesville, SC 29070	Advertis
02/20/2012	Twin City News	P. O. Box 2529 Leesville, SC 29070	Advertis
02/14/2012	Twin City News	P. O. Box 2529 Leesville, SC 29070	Advertis
02/14/2012	B & L Senior Center	316 Tall Timbers Dr Leesville, SC 29070	Advertis
02/13/2012	Town of Lexington	111 Maiden Lane Lexington, SC 29072	Meet the Candida
02/11/2012	Vistaprint	95 Hayden Ave. Lexington Lexington, MA 02421	Signs
02/08/2012	WalMart	Hwy 23 Batesburg, SC 29006	Office Supplies

[← Back](#)
[Print](#)

COMPLAINT

EXHIBIT 6

SC.GOV - SC State Ethics Commission: Public Disclosure and Accountability Reporting**Individual Reports****Candidates****Candidate Report Index**

Name: burkett, gregory c
Office: Coroner
County: Lexington
Election Year: 2012

To view the report, click on the report type link.

Search Results

Report Type	Filing Period	Date Filed	Version
Campaign Disclosure	2012, Pre-Election	04/10/2012	Original
Campaign Disclosure	2012, April 10th	04/10/2012	Amendment 1
Campaign Disclosure	2012, Initial	02/05/2012	Original
Statements of Economic Interests	2012	04/06/2012	Original

COMPLAINT

EXHIBIT 7

Abbeville	Sue Simpson	unopposed	Auditor	\$42454	4	\$849.08	3/20/2012
Abbeville	Emily R. McMahon	unopposed	Clerk of Court	\$42425	4	\$1697	3/20/2012
Abbeville	Ronnie Ashley	unopposed	Coroner	\$14768	4	\$590.72	3/20/2012
Abbeville	Claude Thomas	unopposed	County Council #3	\$6800	4	\$272	3/20/2012
Abbeville	Billy Norris	unopposed	County Council #4	\$6800	4	\$272	3/20/2012
Abbeville	Oscar A. Klugh	opposed	County Council #5	\$6800	4	\$272	3/20/2012
Abbeville	Doris Thompson	opposed	County Council #5	\$6800	4	\$272	3/20/2012
Abbeville	James P. McCord	opposed	County Council #5	\$6800	4	\$272	3/20/2012
Abbeville	Rick Campbell	opposed	County Council #6	\$6800	4	\$272	3/20/2012
Abbeville	Joseph Cade	opposed	County Council #6	\$6800	4	\$272	3/20/2012
Abbeville	Charles H. Goodwin	opposed	County Council #6	\$6800	4	\$272	3/20/2012
Abbeville	Marvin Ray Watson II	opposed	Sheriff	\$55346	4	\$2237.84	3/20/2012
Abbeville	Bob Shirley	opposed	Sheriff	\$55346	4	\$2237.84	3/20/2012
Abbeville	Lee Garrett	opposed	State Representative #11	\$10400	2	\$208	3/20/2012
Abbeville	Andrew Seegars	opposed	State Representative #11	\$10400	2	\$208	3/20/2012
Aiken	Liz Godard	unopposed	State Representative #11	\$10400	2	\$208	3/20/2012
Aiken	LaWana R. McKenzie	unopposed	Clerk of Court	\$78355.7	4	\$3134.23	3/21/2012
Aiken	Willar H. Hightower, Jr.	unopposed	County Council #3	\$13440	4	\$537.6	3/26/2012
Aiken	Sue Roe	unopposed	County Council #8	\$13440	4	\$537.6	3/26/2012
Aiken	William "Bill" Clyburn	unopposed	Probate Judge	\$66036.1	4	\$3441.11	3/19/2012
Aiken	Jonathan Hill	unopposed	State Representative #82	\$10400	2	\$208	3/16/2012
Allendale	Theresa H. Taylor	unopposed	State Representative #84	\$10400	2	\$208	3/16/2012
Allendale	J.W. Wall, Jr.	unopposed	County Council #1	\$9000	4	\$360	3/23/2012
Anderson	Jeff Ricketson	unopposed	County Council #4	\$9000	4	\$360	3/23/2012
Anderson	Gracie S. Floyd	unopposed	County Council #1	\$8930	2	\$178.6	3/27/2012
Anderson	Joshua Terrell Johnson	unopposed	County Council #2	\$8930	2	\$178.6	3/27/2012
Anderson	Mike Vandiver	unopposed	County Council #3	\$8930	2	\$178.6	3/27/2012
Bamberg	James B. Hiers	unopposed	County Council #5	\$8930	2	\$178.6	3/27/2012
Bamberg	Willard H. Duncan	unopposed	Clerk of Court	\$48555	4	\$1942.2	3/16/2012
Bamberg	Gregory P. Clark, Sr.	opposed	Coroner	\$17045	4	\$681.8	3/29/2012
Bamberg	Trent Knard	opposed	County Council - District 1	\$81116.4	4	\$324.66	3/27/2012
Bamberg	Joe Guess, Jr.	unopposed	County Council - District 1	\$8116.4	4	\$324.66	3/27/2012
Bamberg	Isaiah Odum	unopposed	County Council - District 4	\$8116.4	4	\$324.66	3/27/2012
Bamberg	Clinton Murdock Carter	unopposed	County Council - District 5	\$8116.4	4	\$324.66	3/27/2012
Bamberg	Sarah Guess Noel	opposed	County Council #7	\$8116.4	4	\$324.66	3/27/2012
Bamberg	Donna Blume Brown	opposed	Probate Judge	\$47545	4	\$1901.8	3/16/2012
Bamberg	Billy Rhoad	opposed	Probate Judge	\$47545	4	\$1901.8	3/16/2012
Bamberg	J. Edward Darnell	unopposed	Sheriff	\$62742	4	\$2509.68	3/16/2012
Barnwell	Bakari Sellers	unopposed	State Representative #90	\$10400	2	\$208	3/29/2012
Barnwell	Rhonda D. McElveen	unopposed	Clerk of Court	\$58859.76	4	\$2354.39	3/16/2012
Barnwell	Freddie L. Houston	unopposed	County Council - District 1	\$7760	4	\$310.4	3/21/2012
Barnwell	Branna Woodward	unopposed	County Council - District 1	\$7760	4	\$310.4	3/21/2012
Barnwell	Kiffany Perfote	unopposed	County Council - District 3	\$7760	4	\$310.4	3/21/2012
Beaufort	Lonnie Hosey	unopposed	State Representative #91	\$10400	2	\$208	3/16/2012
Beaufort	Herbert N. Glaze	opposed	County Council - District 1	\$11038	4	\$441.52	3/16/2012
Beaufort	Gerald Dawson	opposed	County Council - District 1	\$11038	4	\$441.52	3/16/2012
Berkeley	William L. McBride	unopposed	County Council - District 3	\$11038	4	\$441.52	3/20/2012
Berkeley	Tonia Aiken-Taylor	unopposed	County Council - District 3	\$10400	2	\$208	3/20/2012
Berkeley	Joe Jefferson	unopposed	State Representative #100	\$10400	2	\$208	3/28/2012
Berkeley	Marian Redish	unopposed	State Representative #102	\$10400	2	\$208	3/19/2012
Berkeley	Barbara McGowin	unopposed	State Representative #15	\$10400	2	\$208	3/27/2012
Calhoun	April Wise	unopposed	State Senate #44	\$10400	4	\$416	3/27/2012
Calhoun	Kenneth Hasty	unopposed	Auditor	\$52145	4	\$2085.8	3/16/2012
Calhoun	Pamela Claxton	unopposed	Clerk of Court	\$52501	4	\$2100.04	3/26/2012
Calhoun	James Kenneth	opposed	County Council - District 2	\$12000	4	\$480	3/19/2012
Calhoun	Westbury, Jr.	opposed	County Council - District 2	\$12000	4	\$480	3/20/2012
Calhoun	Fredrick W. Robinson	unopposed	Probate Judge	\$52501	4	\$2100.04	3/26/2012
Calhoun	Thomas Summers	unopposed	Sheriff	\$63473	4	\$2538.92	3/16/2012
Calhoun	Harry Ott	unopposed	State Representative #93	\$10400	2	\$208	3/16/2012
Calhoun	Rebecca Furtick	unopposed	Treasurer	\$52145	4	\$2085.8	3/19/2012

Charleston	Peter J. Tecklenburg	opposed	Auditor	\$98989	4	\$3959.56	3/22/2012
Charleston	Melva Zinack	opposed	Auditor	\$98989	4	\$3959.56	3/22/2012
Charleston	Colleen Condon	unopposed	County Council - District 2	\$14353	4	\$574.08	3/29/2012
Charleston	John Polk	unopposed	County Council - District 3	\$14353	4	\$574.08	3/29/2012
Charleston	Henry E. Darby	unopposed	County Council - District 4	\$14353	4	\$574.08	3/29/2012
Charleston	Vic Rawl	unopposed	County Council - District 6	\$14353	4	\$574.08	3/29/2012
Charleston	Frederick A. Fielding	opposed	Senate Senate #42	\$10400	4	\$416	3/16/2012
Charleston	Robert Ford	opposed	Senate Senate #42	\$10400	4	\$416	3/16/2012
Charleston	Anthony Mark Whisenant	unopposed	Sheriff	\$148277	4	\$5931.08	3/16/2012
Charleston	David Mack III	unopposed	State Representative #109	\$10400	2	\$208	3/16/2012
Charleston	Wendell Gilliard	unopposed	State Representative #111	\$10400	2	\$208	3/16/2012
Charleston	J. Seth Whipper	unopposed	State Representative #113	\$10400	2	\$208	3/16/2012
Charleston	Larry Carter Center	unopposed	State Representative #114	\$10400	2	\$208	3/16/2012
Charleston	Carol Tempel	unopposed	State Representative #115	\$10400	2	\$208	3/16/2012
Charleston	Robert Brown	unopposed	State Representative #116	\$10400	2	\$208	3/16/2012
Charleston	Leon Stavrakis	unopposed	State Representative #119	\$10400	2	\$208	3/16/2012
Charleston	Paul Tinkler	unopposed	State Senate #41	\$10400	4	\$416	3/16/2012
Charleston	Master Bines	opposed	State Senate #42	\$10400	4	\$416	3/16/2012
Cherokee	Rufus H. Foster, Jr.	unopposed	County Council - District 1	\$10466.3	4	\$418.65	3/19/2012
Cherokee	L. Hoke Parris	unopposed	County Council - District 6	\$10466.3	4	\$418.65	3/19/2012
Chester	Donald A. Wade	unopposed	Auditor	\$53152.58	4	\$2126.1	3/16/2012
Chester	Kim Willford	opposed	Clerk of Court	\$53139.76	4	\$2125.57	3/24/2012
Chester	Sue K. Carpenter	opposed	Clerk of Court	\$53139.76	4	\$2125.57	3/24/2012
Chester	Terry D. Tinker	unopposed	Coroner	\$28120	4	\$1124.8	3/16/2012
Chester	Joe Branham	opposed	County Council #3	\$8560	4	\$342.4	3/16/2012
Chester	Jerry H. Hinson	opposed	County Council #3	\$8560	4	\$342.4	3/16/2012
Chester	John Wayne Holcombe	opposed	County Council #4	\$8560	4	\$342.4	3/16/2012
Chester	William H. Stephenson	opposed	County Council #4	\$8560	4	\$342.4	3/16/2012
Chester	Alex Oliphant	unopposed	County Council #6	\$8560	4	\$342.4	3/16/2012
Chester	Alex Underwood	opposed	Sheriff	\$57368.4	4	\$2294.74	3/16/2012
Chester	Robert F. Cauthen	opposed	Sheriff	\$57368.4	4	\$2294.74	3/16/2012
Chester	Richard L. Smith	opposed	Sheriff	\$57368.4	4	\$2294.74	3/16/2012
Chester	Al Bella-Vance	unopposed	State Senate #17	\$10400	4	\$416	3/28/2012
Chester	Thomas E. Darby	unopposed	Treasurer	\$52418.82	4	\$2096.75	3/20/2012
Chesterfield	Jack Rivers	unopposed	Auditor	\$47628.66	4	\$1905.15	3/27/2012
Chesterfield	Faye L. Sellers	unopposed	Clerk of Court	\$59044.88	4	\$2361.8	3/27/2012
Chesterfield	Kip Kiser	unopposed	Coroner	\$21667.54	4	\$866.7	3/27/2012
Chesterfield	Eddie Rivers	unopposed	County Council #1	\$9203.25	4	\$368.13	3/27/2012
Chesterfield	Frank Poyer	opposed	County Council #5	\$9203.25	4	\$368.13	3/27/2012
Chesterfield	Lenora Powe	unopposed	County Council #5	\$9203.25	4	\$368.13	3/27/2012
Chesterfield	Johnny McKenzie	opposed	County Council #5	\$9203.25	4	\$368.13	3/27/2012
Chesterfield	Matt Rivers	unopposed	County Council #7	\$9203.25	4	\$368.13	3/27/2012
Chesterfield	Catherine Thompson	opposed	County Council #9	\$9203.25	4	\$368.13	3/27/2012
Chesterfield	Robert Cole	opposed	County Council #9	\$9203.25	4	\$368.13	3/27/2012
Chesterfield	Theodore Burns	opposed	County Council #9	\$9203.25	4	\$368.13	3/27/2012
Chesterfield	Phil Powell	opposed	State Representative #53	\$10400	4	\$208	3/27/2012
Chesterfield	Teo Vick	opposed	State Representative #53	\$10400	4	\$208	3/27/2012
Clarendon	Kathy B. Sheeler	unopposed	Treasurer	\$58453.76	4	\$2338.15	3/27/2012
Clarendon	Jerome McCray	opposed	Chairman County Council	\$14000	4	\$560	3/26/2012
Clarendon	Dwight Stewart	opposed	Chairman County Council	\$14000	4	\$560	3/26/2012
Clarendon	Beulah Roberts	unopposed	Clerk of Court	\$48143	4	\$1925.72	3/26/2012
Clarendon	Hayes Samuels Jr.	unopposed	Coroner	\$34199	4	\$1367.96	3/26/2012
Clarendon	Andrew C. English	unopposed	County Council - District 2	\$13000	4	\$520	3/26/2012
Clarendon	Kathy Gedding	unopposed	Probate Judge	\$54496	4	\$2179.84	3/26/2012
Clarendon	James Russell Blackwell	opposed	Sheriff	\$54496	4	\$2179.84	3/26/2012
Clarendon	Randy Garrett	opposed	Sheriff	\$54496	4	\$2179.84	3/26/2012
Clarendon	James Carol Harrington	opposed	Sheriff	\$54496	4	\$2179.84	3/26/2012
Clarendon	Peter V. Surette Jr.	opposed	Sheriff	\$54496	4	\$2179.84	3/26/2012
Clarendon	Willie Bethune	opposed	State Representative #64	\$10400	2	\$208	3/26/2012
Clarendon	Robert L. Ridgeway III	opposed	State Representative #64	\$10400	2	\$208	3/26/2012
Clarendon	Eleezer Carter	opposed	State Senate #36	\$10400	4	\$416	3/26/2012

Clarendon	Kevin Johnson	opposed	State Senate #36	\$10400	4	\$416	3/26/2012
Clarendon	Shaun Kent	opposed	State Senate #36	\$10400	4	\$416	3/26/2012
Colleton	Patricia C. Grant	unopposed	Clerk of Court	\$3033.62	4	\$2571.34	3/16/2012
Colleton	Richard M. Harvey	unopposed	Coroner	\$48582.55	4	\$1943.3	3/16/2012
Colleton	Philip M. Taylor, Sr.	unopposed	County Council - District 23	\$12000	4	\$480	3/16/2012
Colleton	John Washington	opposed	Sheriff	\$74329.46	4	\$2973.18	3/16/2012
Colleton	Andy Strickland	opposed	Sheriff	\$74329.46	4	\$2973.18	3/16/2012
Colleton	Kenneth F. Hodges	unopposed	State Representative #121	\$10400	2	\$208	3/16/2012
Darlington	Rosa D. Hudson	unopposed	Clerk of Court	\$65750	4	\$2630	3/29/2012
Darlington	Scott B. Suggs	unopposed	Coroner	\$35563	4	\$2542.52	3/16/2012
Darlington	J. Todd Hardee	opposed	Coroner	\$34190	4	\$1367.64	3/16/2012
Darlington	Darrian Hayes	opposed	Coroner	\$34190	4	\$1367.64	3/16/2012
Darlington	Frank Coffield	opposed	County Council - District 3	\$7000	4	\$280	3/29/2012
Darlington	Wilhelmina P. Johnson	opposed	County Council - District 3	\$7000	4	\$280	3/29/2012
Darlington	Ryan Heath Jordan	opposed	County Council - District 5	\$7000	4	\$280	3/29/2012
Darlington	J. Wayne Byrd	opposed	Sheriff	\$67609	4	\$2704.36	3/16/2012
Darlington	Charles D. Woodle	opposed	Sheriff	\$67609	4	\$2704.36	3/16/2012
Darlington	Robert Williams	opposed	State Representative #62	\$10400	2	\$208	3/26/2012
Darlington	Denny W. Neilson	opposed	State Representative #62	\$10400	2	\$208	3/26/2012
Darlington	Gerald Malloy	opposed	State Senate #29	\$10400	4	\$416	3/26/2012
Darlington	Belinda D. Copeland	unopposed	Treasurer	\$67349	4	\$2693.96	3/29/2012
Dillon	Gwen T. Hyatt	unopposed	Clerk of Court	\$49107	4	\$1964.28	3/16/2012
Dillon	Donnie R. Grimsley	unopposed	Coroner	\$26527	4	\$1061.18	3/16/2012
Dillon	Madio Major Williamson	opposed	County Council #1	\$14357	4	\$74.28	3/16/2012
Dillon	Randy Goings, Sr.	opposed	County Council #1	\$14357	4	\$74.28	3/16/2012
Dillon	Bobby K. Moody	opposed	County Council #2	\$14357	4	\$74.28	3/16/2012
Dillon	Jack Scott	opposed	County Council #2	\$14357	4	\$74.28	3/16/2012
Dillon	Marvin L. Suggs	opposed	County Council #2	\$14357	4	\$74.28	3/16/2012
Dillon	Robert "Archie" Scott	opposed	County Council #3	\$14357	4	\$74.28	3/16/2012
Dillon	Michael C. Grice	opposed	County Council #3	\$14357	4	\$74.28	3/16/2012
Dillon	Aron R. Gandy	opposed	County Council #4	\$14357	4	\$74.28	3/16/2012
Dillon	T.F. Buzzy Finklea	opposed	County Council #4	\$14357	4	\$74.28	3/16/2012
Dillon	Major Hulon	opposed	Sheriff	\$64453	4	\$2578.12	3/16/2012
Dorchester	Douglas Bryan Pennell	opposed	Sheriff	\$64453	4	\$2578.12	3/16/2012
Dorchester	Miriam S. Branson	opposed	County Council - District 6	\$12000	4	\$480	3/29/2012
Dorchester	Patsy G. Knight	unopposed	State Representative #97	\$10400	2	\$208	3/29/2012
Edgefield	Shirley F. Newby	unopposed	Clerk of Court	\$42710	4	\$1708.4	3/19/2012
Edgefield	Norman Dorn	unopposed	County Council #1	\$8400	2	\$108	3/30/2012
Edgefield	George W. Attaway	unopposed	County Council #3	\$8400	2	\$108	3/30/2012
Edgefield	R. Tracy Freeman	opposed	County Council #4	\$8400	2	\$108	3/30/2012
Edgefield	Betty Butler	opposed	County Council #4	\$8400	2	\$108	3/30/2012
Edgefield	Adell Doby	unopposed	Sheriff	\$56734	4	\$2269.36	3/23/2012
Fairfield	Betty Jo Beckham	opposed	Clerk of Court	\$56833.84	4	\$2273.35	3/16/2012
Fairfield	Dorothy Boyd Belton	opposed	Clerk of Court	\$56833.84	4	\$2273.35	3/16/2012
Fairfield	Barkley Ramsey	unopposed	Coroner	\$21020.79	4	\$840.83	3/21/2012
Fairfield	Creighton Coleman	unopposed	State District #17	\$10400	4	\$416	3/16/2012
Fairfield	Herman W. Young	opposed	Sheriff	\$69086.08	4	\$2763.44	3/19/2012
Fairfield	Will Montgomery	opposed	Sheriff	\$69086.08	4	\$2763.44	3/19/2012
Fairfield	Eddie L. White	opposed	Sheriff	\$69086.08	4	\$2763.44	3/19/2012
Fairfield	Mary Gail Douglas	opposed	State Representative #41	\$10400	2	\$208	3/19/2012
Fairfield	Paul Dove	opposed	State Representative #41	\$10400	2	\$208	3/19/2012
Fairfield	Annie E. McDaniel	opposed	State Representative #41	\$10400	2	\$208	3/19/2012
Fairfield	Palmer Nicholson	opposed	State Representative #41	\$10400	2	\$208	3/19/2012
Fairfield	Eugene Sutton	opposed	State Representative #41	\$10400	2	\$208	3/19/2012
Florence	Connie Reel-Shearin	unopposed	Clerk of Court	\$80589	4	\$3222.76	3/29/2012
Florence	Phil Hanna	unopposed	Coroner	\$74014	4	\$2960.56	3/23/2012
Florence	Lavonne Speedy Bazan	unopposed	County Council - District 2	\$15810	4	\$632.4	3/29/2012
Florence	Mitchell Kirby	opposed	County Council - District 4	\$15810	4	\$632.4	3/29/2012
Florence	Mary Floyd Spring	opposed	County Council - District 4	\$15810	4	\$632.4	3/29/2012
Florence	Dinky Miles	opposed	County Council - District 5	\$15810	4	\$632.4	3/16/2012

Florence	Andy Wilson	opposed	County Council - District 5	\$15810	4	\$632.4	3/16/2012
Florence	Terry Alexander	unopposed	State Representative #59	\$10400	2	\$208	3/16/2012
Florence	Lester Brantham	unopposed	State Representative #61	\$10400	2	\$208	3/16/2012
Florence	Austin Smith	unopposed	State Representative #63	\$10400	2	\$208	3/16/2012
Florence	Roger K. Kirby	unopposed	Treasurer	\$80153	4	\$3206.12	3/29/2012
Georgetown	Alma White	unopposed	Clerk of Court	\$60113	4	\$2404.52	3/29/2012
Georgetown	Leona "Tiger" Miller	unopposed	County Council - District 3	\$12514	4	\$500.56	3/16/2012
Georgetown	Lillie Jean Johnson	unopposed	County Council - District 4	\$12514	4	\$500.56	3/29/2012
Georgetown	Ben Dunn	unopposed	County Council - District 5	\$12514	4	\$500.56	3/16/2012
Georgetown	Darryl C. Carr	unopposed	Sheriff	\$62123	4	\$2484.32	3/19/2012
Georgetown	Carl L. Anderson	opposed	State Representative #103	\$10400	2	\$208	3/19/2012
Georgetown	Jacqueline Williams	opposed	State Representative #103	\$10400	2	\$208	3/20/2012
Georgetown	Jarrod Ownbey	unopposed	State Representative #108	\$10400	2	\$208	3/20/2012
Georgetown	Loretta D. Washington-Cooper	unopposed	Treasurer	\$52387	4	\$2085.48	3/16/2012
Greenville	Lottie Beal Gibson	Opposed	County Council - District 25	\$8240	4	\$329.6	3/29/2012
Greenville	Ralph Sweeney	Opposed	County Council - District 25	\$8240	4	\$329.6	3/29/2012
Greenville	Lottie Beal Gibson	opposed	County Council #25	\$22892.74	4	\$915.71	3/20/2012
Greenville	Ralph Sweeney	opposed	County Council #25	\$22892.74	4	\$915.71	3/20/2012
Greenville	Dexter L. Reaves	unopposed	Sheriff	\$138331.24	4	\$5533.25	3/28/2012
Greenville	Dexter L. Reaves	unopposed	Sheriff	\$138331.24	4	\$5533.25	3/30/2012
Greenville	Israel Romero	Unopposed	State Representative #20	\$10400	2	\$208	3/29/2012
Greenville	Israel Romero	unopposed	State Representative #20	\$10400	2	\$208	3/20/2012
Greenville	David R. Gahan	Unopposed	State Representative #22	\$10400	2	\$208	3/29/2012
Greenville	David R. Gahan	unopposed	State Representative #22	\$10400	2	\$208	3/20/2012
Greenville	Chandra Dillard	Opposed	State Representative #23	\$10400	2	\$208	3/29/2012
Greenville	D.C. Swinton	Opposed	State Representative #23	\$10400	2	\$208	3/29/2012
Greenville	Chandra Dillard	opposed	State Representative #23	\$10400	2	\$208	3/20/2012
Greenville	D.C. Swinton	opposed	State Representative #23	\$10400	2	\$208	3/20/2012
Greenville	Tony Boyce	Opposed	State Representative #25	\$10400	2	\$208	3/29/2012
Greenville	Seldon Peden	Opposed	State Representative #25	\$10400	2	\$208	3/29/2012
Greenville	Leola Robinson-Simpson	Opposed	State Representative #25	\$10400	2	\$208	3/29/2012
Greenville	Tony Boyce	opposed	State Representative #25	\$10400	2	\$208	3/29/2012
Greenville	Seldon Peden	opposed	State Representative #25	\$10400	2	\$208	3/20/2012
Greenville	Leola Robinson-Simpson	opposed	State Representative #25	\$10400	2	\$208	3/20/2012
Greenville	Renita Barksdale	Unopposed	State Representative #27	\$10400	2	\$208	3/20/2012
Greenville	Renita Barksdale	unopposed	State Representative #27	\$10400	2	\$208	3/29/2012
Greenville	Karl B. Allen	Opposed	State Senate #7	\$10400	4	\$416	3/20/2012
Greenville	Ennis M. Fant	Opposed	State Senate #7	\$10400	4	\$416	3/28/2012
Greenville	Lillian Brock Flemming	Opposed	State Senate #7	\$10400	4	\$416	3/28/2012
Greenville	Karl B. Allen	opposed	State Senate #7	\$10400	4	\$416	3/21/2012
Greenville	Ennis M. Fant	opposed	State Senate #7	\$10400	4	\$416	3/21/2012
Greenville	Lillian Brock Flemming	opposed	State Senate #7	\$10400	4	\$416	3/21/2012
Greenville	Jeff Dishner	Unopposed	State Senate #8	\$10400	4	\$416	3/28/2012
Greenville	Jeffrey L. Dishner	unopposed	State Senate #8	\$10400	4	\$416	3/22/2012
Greenville	Felicia K. Moton	unopposed	State Senate #8	\$10400	4	\$416	3/27/2012
Greenville	Marcia Kelley-Clark	unopposed	Clerk of Court	\$36575	4	\$1163	3/16/2012
Greenville	Anne Parks	unopposed	Coroner	\$29075	4	\$1163	3/16/2012
Greenville	Robert Merritt	unopposed	State Representative #121	\$10400	2	\$208	3/16/2012
Greenville	Floyd Nicholson	unopposed	State Representative #13	\$10400	2	\$208	3/29/2012
Hampton	Teresa H. Williams	unopposed	State Senate #10	\$10400	4	\$416	3/16/2012
Hampton	Myrinda D. Nettles	unopposed	Auditor	\$50136	4	\$2005.44	3/16/2012
Hampton	Roy Hollingsworth, Jr.	opposed	Clerk of Court	\$43944	4	\$1757.76	3/16/2012
Hampton	Christopher Haulsee	opposed	County Council	\$6736	4	\$269.44	3/16/2012
Hampton	James W. Fennell	opposed	County Council	\$6736	4	\$269.44	3/16/2012
Hampton	Bill Bowers	unopposed	State Rep #122	\$6736	4	\$269.44	3/29/2012
Hampton	Wilson P. Tuten, Jr.	unopposed	Treasurer	\$10400	2	\$208	3/19/2012
Horry	Kenneth Robinson	unopposed	County Council #10	\$15986.08	4	\$2005.44	3/16/2012
Horry	Manon Foxworth	unopposed	County Council #3	\$15986.08	4	\$638.64	3/29/2012
Horry	Keisa Kirkland	unopposed	School Board #8	\$9600	4	\$384	3/30/2012

Horry	Ronald Bessant	unopposed	School Board #9	\$9600	4	\$384	3/30/2012
Horry	Charles Randall	unopposed	State Representative #104	\$10400	4	\$208	3/30/2012
Horry	Cedric D. Spain	unopposed	State Representative #58	\$10400	4	\$208	3/30/2012
Horry	Butch Johnson	unopposed	State Senate #28	\$10400	4	\$416	3/30/2012
Jasper	Margaret Bostick	opposed	Clerk of Court	\$58775	4	\$2351	3/28/2012
Jasper	Raymon J. Hamilton	opposed	Coroner	\$58775	4	\$543	3/16/2012
Jasper	Linious Martin Sauls	opposed	County Council - At Large	\$13575	4	\$652	3/29/2012
Jasper	Henry C. Etheridge	opposed	County Council - At Large	\$16300	4	\$652	3/29/2012
Jasper	James Chilsom	opposed	County Council - At Large	\$16300	4	\$652	3/29/2012
Jasper	Barbara Clark	opposed	County Council - At Large	\$16300	4	\$652	3/29/2012
Jasper	Stephen J. Reaves	opposed	County Council - At Large	\$16300	4	\$652	3/29/2012
Jasper	Andrea W. Smallwood	opposed	County Council - At Large	\$16300	4	\$652	3/29/2012
Jasper	Garry W. Hodges	opposed	County Council - At Large	\$16300	4	\$652	3/29/2012
Jasper	Darrell Thomas Johnson, Jr.	opposed	County Council - At Large	\$16300	4	\$652	3/29/2012
Jasper	Reginald Bush Jr.	opposed	County Council - At Large	\$16300	4	\$652	3/29/2012
Jasper	Samuel Gregory	opposed	County Council - At Large	\$16300	4	\$652	3/29/2012
Jasper	Albert L. Kleckley Jr.	opposed	Probate Judge	\$58917	4	\$2343	3/16/2012
Jasper	Patricia Hicks Dupont	opposed	Probate Judge	\$58917	4	\$2343	3/16/2012
Jasper	Gregory B. Jenkins	opposed	Sheriff	\$76875	4	\$3075	3/16/2012
Jasper	Sam C. Woodward	opposed	Sheriff	\$76875	4	\$3075	3/16/2012
Jasper	Charles Maestro Mitchell, Sr.	opposed	Sheriff	\$76875	4	\$3075	3/16/2012
Jasper	Keefe D. Blacksley	opposed	Sheriff	\$76875	4	\$3075	3/16/2012
Jasper	Curtis Brantley	unopposed	State Representative #122	\$10400	2	\$208	3/16/2012
Jasper	Clementia Pinckney	unopposed	State Senate #45	\$10400	4	\$416	3/28/2012
Kershaw	Robert "Bobby" Gary	unopposed	County Council - District 1	\$10357.04	4	\$422.28	3/30/2012
Kershaw	Sammie Tucker, Jr.	unopposed	County Council - District 2	\$10357.04	4	\$422.28	3/27/2012
Kershaw	Laurie Slade Funderburk	unopposed	State Representative #52	\$10400	2	\$208	3/16/2012
Kershaw	Vincent Sheheen	unopposed	State Senate #27	\$10400	4	\$416	3/22/2012
Lancaster	Cheryl H. Morgan	unopposed	Auditor	\$63809	4	\$2552.36	3/16/2012
Lancaster	Jeff L. Hammond	unopposed	Clerk of Court	\$63723	4	\$2548.92	3/16/2012
Lancaster	Mike Morris	unopposed	Coroner	\$50565	4	\$2022.2	3/16/2012
Lancaster	Kathy G. Sistrare	unopposed	County Council - District 5	\$10000	4	\$400	3/30/2012
Lancaster	Barry Faile	unopposed	Sheriff	\$73966	4	\$2958.64	3/16/2012
Lancaster	Bob M. Cook	opposed	State Representative #44	\$10400	2	\$208	3/16/2012
Laurens	Mandy Powers Norrell	opposed	State Representative #44	\$10400	2	\$208	3/30/2012
Laurens	F.G. "Nick" Nichols	unopposed	Coroner	\$24860	4	\$994.4	3/30/2012
Laurens	Edward A. McDaniel	unopposed	County Council - District 3	\$9788	4	\$391.52	3/30/2012
Laurens	Diane B. Anderson	unopposed	County Council - District 6	\$9788	4	\$391.52	3/30/2012
Laurens	David A. Pitts	unopposed	County Council - District 7	\$9788	4	\$391.52	3/30/2012
Laurens	Eric Robinson	opposed	Sheriff	\$75606	4	\$3024.24	3/30/2012
Laurens	Jerry Campbell	opposed	Sheriff	\$75606	4	\$3024.24	3/30/2012
Lee	Edgar Taylor	unopposed	State Representative #14	\$10400	2	\$208	3/29/2012
Lee	James Davis	opposed	Clerk of Court	\$56829.24	4	\$2273.17	3/16/2012
Lee	Windl King	opposed	Clerk of Court	\$56829.24	4	\$2273.17	3/16/2012
Lee	John Dellinger	opposed	Coroner	\$36581.14	4	\$1463.25	3/16/2012
Lee	Larry Logan	opposed	Coroner	\$36581.14	4	\$1463.25	3/16/2012
Lee	Mattie Westry	opposed	County Council #1	\$11250.46	4	\$450.02	3/21/2012
Lee	Travis Windham	opposed	County Council #1	\$11250.46	4	\$450.02	3/21/2012
Lee	Ronald Fountain	opposed	County Council #2	\$11250.46	4	\$450.02	3/21/2012
Lee	Stephen Beasley	opposed	County Council #2	\$11250.46	4	\$450.02	3/21/2012
Lee	Jackie Jolley	unopposed	County Council #5	\$11250.46	4	\$450.02	3/21/2012
Lee	Catherine Harris	unopposed	Probate Judge	\$53518.66	4	\$2140.75	3/16/2012
Lee	Graham Drayton	unopposed	School Board #1	\$3600	4	\$144	3/21/2012
Lee	Jessie Belvin	unopposed	School Board #2	\$3600	4	\$144	3/21/2012
Lee	Queenie Boyd	unopposed	School Board #3	\$3600	4	\$144	3/21/2012
Lee	Sanya Moses	opposed	School Board #7	\$3600	4	\$144	3/21/2012
Lee	Cathy Johnson	opposed	School Board #7	\$3600	4	\$144	3/21/2012
Lee	Daniel Simon	unopposed	Sheriff	\$65687.18	4	\$2627.49	3/16/2012
Lee	Grady Brown	unopposed	State Representative #50	\$10400	2	\$208	3/19/2012

Lexington	Joan Waggoner Guy	Unopposed	Clerk of Court	\$73091	4	\$2923.84	3/29/2012
Lexington	Robert "Bob" Vanlue	Unopposed	State Representative #69	\$10400	2	\$208	3/29/2012
Lexington	Walid Hakim	Unopposed	State Representative #88	\$10400	2	\$208	3/29/2012
Lexington	Nikki Setzler	Unopposed	State Senate #26	\$10400	4	\$416	3/28/2012
Marion	Sherry R. Rhodes	unopposed	Clerk of Court	\$49727	4	\$1989.08	3/19/2012
Marion	Jerry M. Richardson	unopposed	Coroner	\$28142	4	\$1125.68	3/16/2012
Marion	John Q. Atkinson, Jr.	unopposed	County Council - District 1	\$9252	4	\$370.08	3/19/2012
Marion	Simon M. Jenkins	opposed	County Council - District 2	\$9252	4	\$370.08	3/16/2012
Marion	Kevin L. Grant	opposed	County Council - District 2	\$9252	4	\$370.08	3/22/2012
Marion	Allen W. Floyd	unopposed	County Council - District 4	\$9252	4	\$370.08	3/16/2012
Marion	Buddy Collins	unopposed	County Council - District 6	\$9252	4	\$370.08	3/16/2012
Marion	Tory Carroll Atkinson III	opposed	Probate Judge	\$51336	4	\$2053.44	3/19/2012
Marion	Levone Graves	opposed	Probate Judge	\$51336	4	\$2053.44	3/28/2012
Marion	Mark Richardson	unopposed	Sheriff	\$49727	4	\$1989.08	3/16/2012
Marion	J. Wayne George	unopposed	State Representative #57	\$10400	2	\$208	3/16/2012
Marion	Kent Williams	opposed	State Senate #30	\$10400	4	\$416	3/16/2012
Marion	Patrick Richardson	opposed	State Senate #30	\$10400	4	\$416	3/28/2012
Marlboro	William B. Funderburk	opposed	Clerk of Court	\$47794	4	\$1911.76	3/16/2012
Marlboro	Steve Weaver	opposed	Clerk of Court	\$47794	4	\$1911.76	3/19/2012
Marlboro	Timothy E. Brown	unopposed	Coroner	\$18920	4	\$756.8	3/16/2012
Marlboro	Willie Gladden	opposed	County Council - District 2	\$8113	4	\$324.52	3/16/2012
Marlboro	Ryan Mackey	opposed	County Council - District 2	\$8113	4	\$324.52	3/29/2012
Marlboro	Ron Munneflyn	unopposed	County Council - District 3	\$8113	4	\$324.52	3/16/2012
Marlboro	Carolyn A. Prince	unopposed	County Council - District 5	\$8113	4	\$324.52	3/16/2012
Marlboro	Ken Allen	opposed	County Council - District 6	\$8113	4	\$324.52	3/16/2012
Marlboro	Verd Odom	opposed	County Council - District 6	\$8113	4	\$324.52	3/16/2012
Marlboro	Fred Brantley	opposed	Sheriff	\$50148	4	\$2005.92	3/22/2012
Marlboro	Charles R. English	opposed	Sheriff	\$50148	4	\$2005.92	3/22/2012
Marlboro	Fred Knight	opposed	Sheriff	\$50148	4	\$2005.92	3/22/2012
Marlboro	Elizabeth R. Munnerlyn	opposed	State Representative #54	\$10400	2	\$208	3/16/2012
Marlboro	Johnny Sellers	opposed	State Representative #54	\$10400	2	\$208	3/16/2012
Marlboro	Delorice B. Barrington	unopposed	Treasurer	\$46223	4	\$1848.92	3/16/2012
McCormick	Gwendolyn Chiles	unopposed	Clerk of Court	\$44082	4	\$1763.28	3/16/2012
McCormick	Faye L. Puckett	unopposed	Coroner	\$15070	4	\$602.8	3/17/2012
McCormick	Henry Banks	unopposed	County Council - District 1	\$6649	4	\$265.96	3/22/2012
McCormick	Byron Thompson	unopposed	County Council - District 3	\$6649	4	\$265.96	3/22/2012
McCormick	Charles Jennings	unopposed	County Council - District 4	\$6649	4	\$265.96	3/22/2012
McCormick	George Reid	unopposed	Sheriff	\$53020	4	\$2120.8	3/16/2012
Newberry	Donna W. Lominack	unopposed	Auditor	\$79659.02	4	\$3186.36	3/16/2012
Newberry	Jackie S. Bowers	unopposed	Clerk of Court	\$76870.73	4	\$3074.83	3/16/2012
Newberry	Craig Newton	unopposed	Coroner	\$31168.2	4	\$478.2	3/16/2012
Newberry	Timothy L. Carroll	unopposed	County Council #1	\$11955.1	4	\$478.2	3/16/2012
Newberry	Kirksey David Koon	unopposed	County Council #4	\$11955.1	4	\$478.2	3/16/2012
Newberry	Gloria Rikard Crayne	unopposed	County Council #5	\$11955.1	4	\$478.2	3/16/2012
Newberry	Lee Foster	unopposed	Sheriff	\$9944.96	4	\$3997.8	3/16/2012
Newberry	Walt McLeod	unopposed	State Representative #40	\$10400	2	\$208	3/16/2012
Newberry	Karen D. Linder	unopposed	Treasurer	\$78268.8	4	\$3130.75	3/16/2012
Oconee	Jack T. Collins	unopposed	County Council #4	\$8000	4	\$320	3/30/2012
Oconee	John W. Hester	unopposed	State Representative #1	\$10400	2	\$208	3/30/2012
Orangeburg	Zachariah E. Johnson	opposed	Clerk of Court	\$68675	4	\$2747	3/26/2012
Orangeburg	Winnifia B. Clark	opposed	Clerk of Court	\$68675	4	\$2747	3/26/2012
Orangeburg	Samuelia Marshall	unopposed	Coroner	\$32796	4	\$1311.84	3/16/2012
Orangeburg	Johnny Ravenel	unopposed	County Council - District 2	\$16347	4	\$63.88	3/19/2012
Orangeburg	Harry F. Wimberly	unopposed	County Council - District 3	\$16347	4	\$63.88	3/19/2012
Orangeburg	Heyward Livingston	opposed	County Council - District 4	\$16347	4	\$63.88	3/22/2012
Orangeburg	Janie Cooper	opposed	County Council - District 5	\$16347	4	\$63.88	3/16/2012
Orangeburg	Delano Scott	Opposed	County Council - District 5	\$16347	4	\$63.88	3/25/2012
Orangeburg	Joseph Garvin	opposed	County Council #4	\$16347	4	\$63.88	3/16/2012
Orangeburg	Darnell M. Johnson	opposed	Sheriff	\$73239	4	\$2931.96	3/16/2012
Orangeburg	Roger Heaton	opposed	Sheriff	\$73239	4	\$2931.96	3/16/2012
Orangeburg	Leroy Ravnell	opposed	Sheriff	\$73239	4	\$2931.96	3/16/2012

Orangeburg	Gilda Cobb-Hunter	unopposed	State Representative #66	\$10400	2	\$208	3/19/2012
Orangeburg	Jerry N. Govan, Jr.	unopposed	State Representative #95	\$10400	2	\$208	3/20/2012
Orangeburg	John W. Matthews, Jr.	unopposed	State Senate #39	\$10400	4	\$416	3/22/2012
Orangeburg	Brad Hutto	unopposed	State Senate #40	\$10400	4	\$416	3/16/2012
Richland	Jeanette W. McBride	unopposed	Clerk of Court	\$103010.57	4	\$4120.42	3/20/2012
Richland	Gary Watts	unopposed	Coroner	\$105217.04	4	\$4208.68	3/16/2012
Richland	Kelvin E. Washington	Opposed	County Council - District 10	\$14500	4	\$580	3/16/2012
Richland	Helen Daniels Taylor	Opposed	County Council - District 10	\$14500	4	\$580	3/28/2012
Richland	Joyce Dickerson	Unopposed	County Council - District 2	\$14500	4	\$580	3/16/2012
Richland	Dannon Jeter	Unopposed	County Council - District 3	\$14500	4	\$580	3/30/2012
Richland	Torrey Rush	Opposed	County Council - District 7	\$14500	4	\$580	3/19/2012
Richland	Gwendolyn Kennedy	Opposed	County Council - District 7	\$14500	4	\$580	3/19/2012
Richland	Jim Manning	Opposed	County Council - District 8	\$14500	4	\$580	3/16/2012
Richland	Thomas Wayne Gilbert	Opposed	County Council - District 8	\$14500	4	\$580	3/30/2012
Richland	Julie Ann Dixon	Unopposed	County Council - District 9	\$14500	4	\$580	3/30/2012
Richland	Leon Loft	Unopposed	Sheriff	\$146277.38	4	\$5851.1	3/16/2012
Richland	Joseph Neal	Unopposed	State Representative #70	\$10400	2	\$208	3/26/2012
Richland	James E. Smith, Jr.	Unopposed	State Representative #72	\$10400	2	\$208	3/23/2012
Richland	Christopher Hart	Unopposed	State Representative #73	\$10400	2	\$208	3/21/2012
Richland	J. Todd Rutherford	Unopposed	State Representative #74	\$10400	2	\$208	3/29/2012
Richland	Joe McCulloch	Unopposed	State Representative #75	\$10400	2	\$208	3/16/2012
Richland	Leon Howard	Unopposed	State Representative #76	\$10400	2	\$208	3/26/2012
Richland	Joe McEachern	Opposed	State Representative #77	\$10400	2	\$208	3/16/2012
Richland	Chris Sullivan	Opposed	State Representative #77	\$10400	2	\$208	3/27/2012
Richland	Michael Bailey	Opposed	State Representative #77	\$10400	2	\$208	3/30/2012
Richland	Beth Bernstein	Unopposed	State Representative #78	\$10400	2	\$208	3/16/2012
Richland	Mia Butler Garrick	opposed	State Representative #79	\$10400	2	\$208	3/16/2012
Richland	Vannie Williams, Jr.	opposed	State Representative #79	\$10400	2	\$208	3/30/2012
Richland	Jimmy Bales	unopposed	State Representative #80	\$10400	2	\$208	3/16/2012
Richland	John L. Scott, Jr.	Unopposed	State Senate #19	\$10400	4	\$416	3/16/2012
Richland	Robert Rikard	Opposed	State Senate #20	\$10400	4	\$416	3/16/2012
Richland	Norman Jackson	Opposed	State Senate #20	\$10400	2	\$416	3/30/2012
Richland	Darrell Jackson	Unopposed	State Senate #21	\$10400	4	\$416	3/16/2012
Richland	Joel Lourie	Unopposed	State Senate #22	\$10400	4	\$416	3/20/2012
Saluda	Doris B. Holmes	unopposed	Clerk of Court	\$33659	4	\$1346.36	3/29/2012
Saluda	Brian Keith Turner	unopposed	Coroner	\$32633	4	\$1305.32	3/28/2012
Saluda	William Pugh	unopposed	County Council	\$6000	4	\$240	3/29/2012
Saluda	Fredrick Wideman	opposed	Sheriff	\$46261	4	1850.44	3/30/2012
Saluda	John C. Perry	opposed	Sheriff	\$46261	4	1850.44	3/30/2012
Saluda	Beth Jeffrey Herlong	opposed	Sheriff	\$46261	4	1850.44	3/30/2012
Spartanburg	Michael Brown	unopposed	County Council - District 1	\$12500	4	\$500	3/29/2012
Spartanburg	John Lewis	opposed	State Representative #31	\$10400	2	\$208	3/30/2012
Spartanburg	Harold Mitchell	opposed	State Representative #31	\$10400	2	\$208	3/17/2012
Spartanburg	Glenn Reese	unopposed	State Senate #11	\$10400	2	\$416	3/16/2012
Spartanburg	Henni Thompson	unopposed	State Senate #12	\$10400	4	\$416	3/30/2012
Sumter	Thomas H. Bultman	opposed	Auditor	\$55527	4	\$2221.08	3/29/2012
Sumter	Lauretha A. McCants	opposed	Auditor	\$55527	4	\$2221.08	3/28/2012
Sumter	James C. Campbell	unopposed	Clerk of Court	\$58428	4	\$2337.12	3/28/2012
Sumter	Isaac Johnson	opposed	Coroner	\$29112	4	\$1164.48	3/29/2012
Sumter	Lucius Harvin Bullock	opposed	Coroner	\$29112	4	\$1164.48	3/29/2012
Sumter	Robert A. Galliano III	opposed	Coroner	\$29112	4	\$1164.48	3/29/2012
Sumter	Shawn Ragin	opposed	Coroner	\$29112	4	\$1164.48	3/29/2012
Sumter	Naomi D. Sanders	opposed	County Council - District 1	\$12398	4	\$495.92	3/28/2012
Sumter	Alphonso Johnson	opposed	County Council - District 1	\$12398	4	\$495.92	3/28/2012
Sumter	Vivian Fleming	unopposed	County Council - District 5	\$12398	4	\$495.92	3/28/2012
Sumter	McChane	unopposed	County Council - District 7	\$12398	4	\$495.92	3/28/2012
Sumter	Eugene R. Baten	opposed	Sheriff	\$66067	4	\$2642.68	3/30/2012
Sumter	Benny L. Webb	opposed	Sheriff	\$66067	4	\$2642.68	3/30/2012
Sumter	Aaron Vaughn	opposed	Sheriff	\$66067	4	\$2642.68	3/30/2012
Sumter	Anthony Dennis	opposed	Sheriff	\$66067	4	\$2642.68	3/30/2012

Sumter	Alexander Dukes	opposed	Sheriff	\$66067	4	\$2642.68	3/30/2012
Sumter	J. David Weeks	unopposed	State Representative #51	\$10400	2	\$208	3/26/2012
Sumter	J. Thomas McElveen III	opposed	State Senate #35	\$10400	4	\$416	3/16/2012
Sumter	E.B. Mac McLeod	opposed	State Senate #35	\$10400	4	\$416	3/16/2012
Sumter	Carolina B. Richardson	unopposed	Treasurer	\$57039	4	\$2281.56	3/29/2012
Union	Melanie Lawson	unopposed	Clerk of Court	\$54552.61	4	\$2182.1	3/30/2012
Union	Curtiss A Hunter	opposed	County Council - District 2	\$9387.66	4	\$375.51	3/16/2012
Union	Joseph F. Hart	Opposed	County Council - District 2	\$9387.66	4	\$375.51	3/29/2012
Union	Ralph Tucker	opposed	County Council - District 2	\$9387.66	4	\$375.51	3/29/2012
Union	Tommy Eugene Ford	opposed	County Council - District 3	\$9387.66	4	\$375.51	3/16/2012
Union	Chrystal W. Coffey	opposed	County Council - District 3	\$9387.66	4	\$375.51	3/26/2012
Union	Randall W. Harvey	opposed	County Council - District 5	\$9387.66	4	\$375.51	3/29/2012
Union	John W. Rampey	opposed	County Council - District 5	\$9387.66	4	\$375.51	3/22/2012
Union	Kacie McCall Petrie	opposed	County Council - District 6	\$9387.66	4	\$375.51	3/22/2012
Union	Jerry Ray Treadway, III	opposed	County Council - District 6	\$9387.66	4	\$375.51	3/30/2012
Union	David Taylor	opposed	Sheriff	\$62169.82	4	\$2486.79	3/21/2012
Union	William Arthur Jolly	opposed	Sheriff	\$62169.82	4	\$2486.79	3/27/2012
Union	Michael Anthony	unopposed	State Representative #42	\$10400	2	\$208	3/26/2012
Williamsburg	Lucinda Green	opposed	Clerk of Court	\$51195	4	\$2047	3/16/2012
Williamsburg	Sharon Washington	opposed	Clerk of Court	\$51195	4	\$2047.8	3/16/2012
Williamsburg	Staggers	opposed	Coroner	\$34598	4	\$1383.92	3/16/2012
Williamsburg	Harrison McKnight Jr.	opposed	County Council - District 3	\$14507	4	\$580.28	3/16/2012
Williamsburg	Jerry W. Fulton, Sr.	opposed	County Council - District 3	\$14507	4	\$580.28	3/16/2012
Williamsburg	Harry Lee Darby	opposed	County Council - District 3	\$14507	4	\$580.28	3/16/2012
Williamsburg	Dottie Punis Evans	opposed	County Council - District 4	\$14507	4	\$580.28	3/16/2012
Williamsburg	Eddie A. Woods, Jr.	opposed	County Council - District 4	\$14507	4	\$580.28	3/16/2012
Williamsburg	Jeremiah Bryant	opposed	County Council - District 4	\$14507	4	\$580.28	3/16/2012
Williamsburg	Andy McKnight	opposed	County Council - District 5	\$14507	4	\$580.28	3/16/2012
Williamsburg	Betty F. Matthews	unopposed	Probate Judge	\$57066	4	\$2282.64	3/16/2012
Williamsburg	Michael L. Johnson	opposed	Sheriff	\$54018	4	\$2160.72	3/16/2012
Williamsburg	Sandy Thompson	opposed	Sheriff	\$54018	4	\$2160.72	3/16/2012
Williamsburg	C. Randy Grayson	opposed	Sheriff	\$54018	4	\$2160.72	3/16/2012
Williamsburg	Ronnie A. Sabb	unopposed	State Representative #101	\$10400	2	\$208	3/23/2012
Williamsburg	Cesar E. McKnight	opposed	State Senate #32	\$10400	4	\$416	3/16/2012
Williamsburg	John Yancey McGill	opposed	State Senate #32	\$10400	4	\$416	3/16/2012
York	Jessica Lynn	unopposed	County Council - District 3	\$16010.8	2	\$320.22	3/22/2012
York	William Roddey	opposed	County Council - District 4	\$16010.8	2	\$320.22	3/20/2012
York	Roy Blake	opposed	County Council - District 4	\$16010.8	2	\$320.22	3/23/2012
York	Charles Williams	unopposed	County Council - District 7	\$16010.8	2	\$320.22	3/26/2012
York	John R. King	unopposed	State Representative #42	\$10400	2	\$208	3/16/2012

COMPLAINT

EXHIBIT 8

SC.GOV - SC State Ethics Commission: Public Disclosure and Accountability Reporting

Individual Reports

Candidates

Candidate Report Index

Name: Hakim, Walid N
Office: State House Representative
District: 88
Election Year: 2012

To view the report, click on the report type link.

Search Results

Report Type	Filing Period	Date Filed	Version
Campaign Disclosure	2012, Initial	03/29/2012	Original

COMPLAINT

EXHIBIT 9

Wednesday, 18 April 2012



Lexington County Republican Party

Republican Adherence Committee (RAC)
Gary Taylor, Chairman David James, V. Chair,
New Members: Leo Canaday, Jim Wellman

[Home](#) [LCRP Info](#) [Voter Info](#) [Links](#) [Calendar](#) [Get Involved](#) [Photos](#) [Contact Us](#)

Lexington GOP Calendar

« < April 2012 > »						
S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	1	2	3	4	5

Candidate Filing March 16 2012



The Lexington County Republican Party candidate filing began today at 12 noon and is scheduled to end Friday March 30th at 12 noon.

As of 4PM this afternoon 22 candidates filed for office in with the Lexington County Republican Party.

In order of filing:

1. Jim Eckstrom (Office: Lexington County Treasurer)
2. Rich Bolen (Office: State Senate District 18)
3. Johnny Jeffcoat (Office: Lexington County Council District 6)
4. Kenny Bingham (Office: State House District 89)
5. Kit Spires (Office: State House District 96)
6. James "Jimmy" Metts (Office: Lexington County Sheriff)
7. Bobby Keisler (Office: Lexington County Council District 5)
8. Beth Carrigg (Office: Lexington County Clerk of Court)
9. Duane Naquin (Office: State Senate District 26)
10. Debra "Debbie" Gunter (Office: Lexington County Reg. of Mesne Conveyance)
11. Jim Kinard (Office: Lexington County Council District 1)
12. Katrina Shealy (Office: State Senate District 23)
13. Mac Toole (Office: State House District 88)
14. Chip Huggins (Office: State House District 85)
15. Todd Atwater (Office: State House District 87)
16. Anthony Keisler (Office: Lexington County Council District 3)
17. Rick Quinn (Office: State House District 69)
18. Suzanne Moore (Office: Lexington County Clerk of Court)
19. Brian Duncan (Office: Lexington County District 5)
20. Jake Knotts (Office: State Senate District 23)
21. Ralph Shealy Kennedy (Office: House District 39)
22. Frank Barron III (Office: Lexington County Coroner)

As always if you have any questions you can reach me at 803.422.4245

Sincerely,

Steve Isom, Chairman
Lexington County Republican Party
PO Box 1346
Lexington, SC 29071
803.422.4245

UNITED STATES COPYRIGHT © 2012 Lexington County Republican Party ALL RIGHTS RESERVED

COMPLAINT

EXHIBIT 10

SC.GOV - SC State Ethics Commission: Public Disclosure and Accountability Reporting

Individual Reports

Candidate Campaign Disclosure

2012, April 10th Report

[DOWNLOAD CSV FILE](#)

Candidate: Shealy, Katrina F
Position Sought: State Senate
District/Locale: 23
Election Type: Primary
Election Date: 06/01/2012
Filing Type: Original
Filing Date: 04/10/2012

Select a tab to view more.

[Summary](#)
[Contributions](#)
[Expenditures](#)
[Loans](#)
[Loan Payments](#)
[Assets](#)

Date	Vendor	Address	Description
03/31/2012	Ronnie Lee	110 Lawrence Road West Columbia, SC 29170	Gas Reimburs for Signs
03/31/2012	Pirya	1442 2nd Street San Francisco, CA 94105	Online Payment expense
03/27/2012	Ann Addy	1018 Wordsword Drive Columbia, SC 29209	Expenses BL Recep Southern Occasion Deposit
03/27/2012	Southern Occasions	137 N. Oak Street Batesburg-Leesville, SC 29006	Event Loc Rental BL
03/27/2012	Thompson Rental Services	Box 23858 Columbia, SC 29224	Fund Rais March 23 supplies
03/26/2012	Parson Jack's Cafe	3417-G Shelby Ray Court Charleston, SC 29414	Event Ma Expenses Charlesto
03/23/2012	Professional Printers	PO Box 5287 West Columbia, SC 29171	1000 Rac Cards
03/23/2012	Frazier Catering	253 Squirrel Hollow Lexington, SC 29073	Rental ex of equipn supplies f fund rais
03/22/2012	Jimmy Shealy	116 Wilson Street Lexington, SC 29073	Food for 22nd Eve
03/22/2012	Nikki Trawick	103 Water Hickory Way Columbia, SC 29229	Reimburs Event Suj
03/20/2012	USPS	Hwy. 1 Lexington, SC 29072	Postage
03/19/2012	Twin City News	Highway 1 Leesville, SC 29070	Newspap Advertisir
03/16/2012	Lexington GOP	PO Box 1346 Lexington, SC 29071	Filing Fee
03/14/2012	USPS	Hwy. 1 Lexington, SC 29072	Postage

1877-2

03/08/2012	Blue Marlin	Lincoln Street Columbia, SC 29201	Event
03/07/2012	Jamie Tran	TBD Lexington, SC 29072	Photo set
03/07/2012	James Robinson Photography	112 Woodruff Court Lexington, SC 29072	Professor Photos
03/02/2012	Comporium	1660 Juniper Springs Road Gilbert, SC 29054	Internet Connecti
02/29/2012	Electing Conservatives	998 Gulon Drive Lugoff, SC 29078	Consultin
02/28/2012	Rebecca Shadwell	70 Old Ford Trail Dalzell, SC 29040	Staff
02/28/2012	Rebecca Shadwell	70 Old Ford Trail Dalzell, SC 29040	Reimburs for Office Supplies
02/24/2012	Ted O. McGee Real Estate	560 Meeting Street West Columbia, SC 29169	Office Sp. Rental
02/23/2012	Joey Frazier	121 Fox Street Lexington, SC 29072	On site Fi photograp
02/21/2012	Service Printing	1351 Key Road Columbia,, SC 29229	District M
02/21/2012	Betsy Dodds	204 Patto Place Columbia, SC 29212	Reimburs for camp; supplies
02/16/2012	Electing Conservatives	998 Gulon Drive Lugoff, SC 29078	Consultin Retainer
02/09/2012	USPS	Hwy. 1 Lexington, SC 29072	Box Rent
02/07/2012	Simplified Office Systems	130 Hunter Village Drive, Suite D Irmo, SC 29063	Multi Fun Copier
02/06/2012	Capitol Consulting Strategies LLC	PO Box 30387 Columbia, SC 29230	Revise Pa card - Pre informati
01/17/2012	Capitol Consulting Strategies LLC	PO Box 30387 Columbia, SC 29230	Legislativ Research Database developrr
01/13/2012	Promo- Tech	701 Indigo Ave. Cayce, SC 29033	Advertisir SCGOP D
03/31/2011	Bank of America	5559 Sunset Blvd. Lexington, SC 29072	Check Or Fee

[← Back](#)
[Print](#)

COMPLAINT

EXHIBIT 11

SC.GOV - SC State Ethics Commission: Public Disclosure and Accountability Reporting**Individual Reports****Candidates****Candidate Report Index**

Name: Shealy, Katrina F
Office: State Senate
District: 23
Election Year: 2012

To view the report, click on the report type link.

Search Results

Report Type	Filing Period	Date Filed	Version
Campaign Disclosure	2012, April 10th	04/10/2012	Original
Campaign Disclosure	2012, January 10th	01/10/2012	Original
Campaign Disclosure	2011, October 10th	10/10/2011	Original
Campaign Disclosure	2011, July 10th	07/09/2011	Original
Campaign Disclosure	2011, April 10th	04/08/2011	Original
Campaign Disclosure	2011, January 10th	01/10/2011	Original
Campaign Disclosure	2010, October 10th	10/12/2010	Original
Statements of Economic Interests	2012	04/12/2012	Original
Statements of Economic Interests	2008	05/04/2008	Original

COMPLAINT

EXHIBIT 12

SC.GOV - SC State Ethics Commission: Public Disclosure and Accountability Reporting**Individual Reports****Candidates****Candidate Report Index**

Name: mcmillan, jimmy d
Office: State House Representative
District: 36
Election Year: 2012

To view the report, click on the report type link.

Search Results

Report Type	Filing Period	Date Filed	Version
Campaign Disclosure	2012, April 10th	04/10/2012	Original
Statements of Economic Interests	2012	04/16/2012	Original
Statements of Economic Interests	2011	04/02/2012	Original
Statements of Economic Interests	2010	07/12/2010	Amendment 1
Statements of Economic Interests	2010	08/03/2009	Original

COMPLAINT

EXHIBIT 13

SC.GOV - SC State Ethics Commission: Public Disclosure and Accountability Reporting**Individual Reports****Candidates****Candidate Report Index**

Name: Carter Center, Larry H
Office: State House Representative
District: 114
Election Year: 2012

To view the report, click on the report type link.

Search Results

Report Type	Filing Period	Date Filed	Version
Statements of Economic Interests	2012	04/17/2012	Original

COMPLAINT

EXHIBIT 14

WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW

930 RICHLAND STREET

P.O. BOX 8416

COLUMBIA, SOUTH CAROLINA 29202-8416

MITCHELL M. WILLOUGHBY
JOHN M.S. HOEFER
RANDOLPH R. LOWELL
TRACEY C. GREEN
BENJAMIN P. MUSTIAN
ELIZABETH ZECK*
ELIZABETHANN LOADHOLT FELDER
ANDREW J. MACLEOD
CHAD N. JOHNSTON
JOHN W. ROBERTS

AREA CODE 803
TELEPHONE 252-3300
TELECOPIER 256-8062

*ALSO ADMITTED IN TX

April 16, 2012

VIA U.S. MAIL AND EMAIL

Marci Andino
Executive Director South Carolina Election Commission
Post Office Box 5987
Columbia, SC 29250
mandino@elections.sc.gov

Dick Harpootlian
South Carolina Democratic Party Chairman
Post Office Box 1090
Columbia, SC 29202
dharpootlian@scdp.org

Chad Connelly
South Carolina Republican Party Chairman
Post Office Box 12373
Columbia, SC 29201
Chad@scgop.com

RE: 2012 Party Primary Ballot

Dear Madam and Sirs:

Please accept this request on behalf of our client, Michael Anderson of Lexington, South Carolina, to refuse or, if necessary, remove the following purported candidates from the 2012 Party Primary ballot:

Gregory "Clay" Burkett (Republican), Lexington County Coroner
Jimmy D. McMillan (Republican), State House of Representatives, District 36
Walid Hakim (Democrat), State House of Representatives, District 88
Larry Carter Center (Democrat), State House of Representatives, District 114
Katrina Shealy (Republican), State Senate District 23

These purported candidates failed to timely file a Statement of Economic Interests at the same time and with the same official with whom the candidate was required to file their declaration of candidacy pursuant to S.C. Code Ann. § 8-13-1356. Consequently, Mr. Anderson asserts that these persons have not validly declared themselves to be candidates in accordance with the provisions of S.C. Code Ann. § 7-11-15 and are unqualified to appear on the ballot in the upcoming South Carolina Primary Elections.

The South Carolina requirements for filing as a candidate are clear. "In order to qualify as a candidate to run in the general election, all candidates seeking nomination by political party primary . . . must file a statement of intention of candidacy between noon on March sixteenth and noon on March thirtieth," S.C. Code Ann. § 7-11-15. Although certain persons are exempt from the requirement to file statements of economic interests at the same time as their statement of intention of candidacy, *see* S.C. Code Ann. § 8-13-1356(A), (D), and (F),¹ candidates seeking nomination for the State Senate or House of Representatives and for a countywide office are required to file their statements of intention of candidacy with the county executive committee of their respective party. S.C. Code Ann. § 7-11-15(2) and (3). Concurrently, all candidates "must file a statement of economic interests for the preceding calendar year at the same time . . . the candidate files a declaration of candidacy." S.C. Code Ann. § 8-13-1356(B) (emphasis supplied).² Moreover, "an officer authorized to receive declarations of candidacy . . . may not accept a declaration of candidacy . . . unless the declaration . . . is accompanied by a statement of economic interests." S.C. Code § 8-13-1356(E) (emphasis added).

In addition to the clear statutory mandate, the State Election Commission, as well as the State Senate and House Ethics Committees, have made the requirement of contemporaneous filing of the statement of economic interests clear to the political parties, candidates, and the general public. *See* State Election Commission website (http://www.scvotes.org/candidate_information/nomination_by_political_party; "Candidates must also file a Statement of Economic Interest (SEI) form with the State Ethics Commission. This must be done electronically on the State Ethics Commission website. A copy of the SEI receipt, or other proof of filing, is required to be submitted with your SIC form at the time of filing."); State Senate Ethics Committee website (<http://www.scstatehouse.gov/CommitteeInfo/SenateEthics.php>); State House of Representatives Ethics Committee website (<http://www.scstatehouse.gov/committeeinfo/houseethics.php>).

¹ Individuals who have current disclosure statements on file, who are seeking to become candidates other than by filing (e.g., petition candidates), or who file for office before January 1 of the year in which the election is held are subject to different requirements for filing a statement of economic interests.

² Individuals seeking to become candidates must file their statement of economic interests form electronically for public disclosure on the website of the South Carolina Ethics Commission. *See* S.C. Code Ann. §§ 8-13-365 ("These disclosures and reports must be filed using an Internet-based filing system as prescribed by the commission."); <http://ethics.sc.gov/StatementofEconomicInterests/Pages/index.aspx> ("Where are the forms submitted? All Statement of Economic Interests Forms must be filed electronically . . . Upon filing, the information is immediately available to the public through public reporting, also accessed in Quick Links.").

There can be no dispute these persons intended to offer themselves as candidates in the upcoming South Carolina Primary Election. Upon information and belief, each of these candidates were explicitly informed of the statutory mandate of filing a statement of economic interests at the same time by the County Party officials accepting the statements of intention of candidacy. In addition, upon information and belief, the place for filing statements of intention of candidacy for the Party Primary had available a computer terminal for the express purpose of filing statements of economic interests by candidates attempting to file statements of intention of candidacy. Even so, publicly available documents reflect that none of these purported candidates filed a statement of economic interests for 2011, concurrent with their statement of intention of candidacy for their respective offices:

- Mr. Burkett attempted to file for Lexington County Coroner with the Lexington County Republican Party on March 26, 2012. *See* Gregory C. Burkett campaign disclosure report dated April 10, 2012 ("03/26/2012 Lexington GOP PO Box 1346 Lexington, SC 29071 Filing fee \$3,362.60"); Lexington County Republican Party website (<http://www.lexingtongop.com/lcrp-info/candidatefiling2012/thurmarch262012filings>). However, Mr. Burkett failed to file a statement of economic interests until April 6, 2012. *See* Gregory C. Burkett Statement of Economic Interests Report dated April 6, 2012 (available online at <http://apps.sc.gov/PublicReporting/Index.aspx>).
- Mr. McMillan attempted to file for House District 36 with the Spartanburg County Republican Party. He appears not to have filed a campaign disclosure report. However, Mr. McMillan failed to file a statement of economic interests until April 16, 2012. *See* Jimmy D. McMillan Statement of Economic Interests Report dated April 16, 2012 (available online at <http://apps.sc.gov/PublicReporting/Index.aspx>).
- Mr. Hakim attempted to file for House District 88 with the Lexington County Democratic Party on March 29, 2012, (<https://docs.google.com/spreadsheet/ccc?key=0Aq6bWAPKZ0LGdG95QWIZYVJfODJKd3VITelmbXBXMgc#gid=1>). However, the State Ethics Commission website does not reflect that Mr. Hakim has filed a statement of economic interests. *See* State Ethics Commission filings for Walid N. Hakim (available online at <http://apps.sc.gov/PublicReporting/Index.aspx>).
- Mr. Carter Center attempted to file for House District 114 with the Charleston County Democratic Party on March 16, 2012, (<https://docs.google.com/spreadsheet/ccc?key=0Aq6bWAPKZ0LGdG95QWIZYVJfODJKd3VITelmbXBXMgc#gid=1>). However, the State Ethics Commission website does not reflect that Mr. Hakim has filed a statement of economic interests. *See* State Ethics Commission filings for Larry H. Carter Center (available online at <http://apps.sc.gov/PublicReporting/Index.aspx>).

- Ms. Shealy attempted to file for Senate District 23 with the Lexington County Republican Party on March 16, 2012. *See* Katrina F. Shealy campaign disclosure report dated April 10, 2012 ("03/16/2012 Lexington GOP PO Box 1346 Lexington, SC 29071 Filing Fee \$416.00"); Lexington County Republican Party website (<http://www.lexingtongop.com/lcrp-info/candidatefiling2012/fridaymarch162012filings>); However, Ms. Shealy failed to file a statement of economic interests until April 12, 2012. *See* Katrina F. Shealy Statement of Economic Interests Report dated April 12, 2012 (available online at <http://apps.sc.gov/PublicReporting/Index.aspx>).

Although three of the purported candidates filed statements of economic interests after the closing of the filing period, none filed "at the same time" as they filed their statement of intentions of candidacy. The statutory requirements for validly filing a statement of intention of candidacy by these candidates required a contemporaneous, electronic filing of a statement of economic interests. Because the statute gives no room for discretion or extension after the end of filing, the parties should not certify the candidacy of these individuals and the State Election Commission should not approve or permit the printing of ballots with these purported candidates' names to appear on the ballot where it knows the mandatory filing requirements were not met. Furthermore, each of the candidates is seeking election through the party primary system and filed after January 1, 2012, and none had a current disclosure statement on file at the time they filed their statement of intention of candidacy.

Consequently, none of the candidates is eligible for the filing exemptions contemplated by section 8-13-1356 and there can be no justification for these purported candidates' refusal to file statements of economic interests at the same time as filing their statements of intention of candidacy. Mr. Anderson, therefore, requests that the State Election Commission and the State Parties not certify these individuals as candidates for the upcoming 2012 South Carolina Party Primary elections. *See* S.C. Code Ann. § 8-13-1356 (E) ("If the candidate's name inadvertently appears on the ballot, the officer authorized to receive declarations of candidacy ... for nomination must not certify the candidate subsequent to the election.") (emphasis supplied).

Thank you for your assistance with this matter and please do not hesitate to contact me if you have any questions or if I can be of any further assistance.

Sincerely,

WILLOUGHBY & HOEFER, P.A.

Tracy C. Green

COMPLAINT

EXHIBIT 15

SOUTH CAROLINA
ELECTION COMMISSION

April 18, 2012

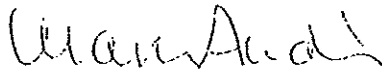
Tracey C. Green
Willoughby & Hoefler, P.A.
930 Richland Street
PO Box 8416
Columbia, SC 29202-8416

Dear Mr. Green:

I am writing in response to your letter on behalf of your client, Michael Anderson of Lexington, South Carolina, concerning the removal of certain candidates from the primary ballots. The State Election Commission is not given the authority to determine if a candidate certified by a political party meets the qualifications to hold office or if the candidate completed the filing process properly. This issue appears to be a party concern and we defer to the political parties or courts for resolution.

Please do not hesitate to contact me if I can be of further assistance.

Sincerely,



Marci Andino

/mba

Cc: Richard A. Harpootlian, SC Democratic Party
Chad Connelly, SC Republican Party

COMMISSIONERS

JOHN H. HUDGENS, III
Chairperson

MARK A. BENSON

MARILYN BOWERS

THOMAS WARING

NICOLE S. WHITE

MARCI ANDINO
Executive Director

2221 Devine Street
P.O. Box 5987
Columbia, SC 29250

803.734.9060
Fax: 803.734.9366
www.scvotes.org