

6. Defendant has been waging, and continues to wage, a persistent campaign of verbally abusing, defaming, and threatening Plaintiff and taking other action to harm Plaintiff. Among other things Defendant has publically stated and published to third parties that Plaintiff has conflicts of interests on Town Council and in her employment with the Boys & Girls Club, that she is a liar, that she is corrupt, that she violated the public's trust and that she is not fit for her job or position on Town Council. A copy of some of the emails attacking Plaintiff personally and professionally are attached hereto as Exhibit "A" and incorporated herein by reference. As shown by the e-mails, these defamatory statements were communicated to numerous third parties included as recipients of the e-mails.
7. Defendant has communicated his intent to secure a full page ad in the local newspaper in an effort to "publically disgrace" and harm Plaintiff. See emails attached as Exhibit "A".
8. Upon information and belief, within the last two weeks, Defendant has directly contacted the Chairman of the Board of the Boys & Girls Club of the Lowcountry, and the Chairman of the Board of the Boys & Girls Club of Hilton Head Island, and the Executive Director of the Boys & Girls Club of the Lowcountry (Plaintiff's direct supervisor) making false, defamatory, and outrageous remarks about Plaintiff and demanding that they take action to terminate Plaintiff from her desired profession and primary gainful employment.
9. As a result of Defendant's campaign of intimidation, defamation, bullying, and other misconduct, Plaintiff has suffered mental and emotional

distress, damage to her reputation, and other special and consequential damages.

FOR A FIRST CAUSE OF ACTION

10. Plaintiff realleges her previous allegations as if fully set forth herein.
11. Defendant has intentionally and recklessly inflicted severe emotional distress on Plaintiff while being certain or substantially certain that such distress would result from his conduct; Defendant's conduct has been and continues to be so extreme and outrageous as to exceed all possible bounds of decency and should be regarded as atrocious and utterly intolerable. Defendants' relentless attacks on Plaintiff action has caused and continues to cause Plaintiff mental and emotional distress that is so severe no reasonable person could be expected to endure it.
12. As a result of Defendant's outrageous conduct, Plaintiff is entitled to judgment against Defendant for an appropriate amount of actual and punitive damages, as well as an award of the injunctive relief described below.

FOR A SECOND CAUSE OF ACTION

13. Plaintiff realleges her previous allegations as if fully realleged herein.
14. Defendant has libeled and slandered Plaintiff numerous times including, but not limited to, his statements in the emails attached hereto as Exhibit "A." The statements regarding Plaintiff in the e-mails attached to Exhibit "A" are all completely false.
15. Defendant made statements defaming Plaintiff similar to those in the attached emails in the open session of the meeting of the Council of the

Town of Hilton Head Island on December 2, 2015. Defendant's defamatory remarks accuse Plaintiff of committing a crime, being unfit for her employment, and are intended to degrade her with her employer, her friends, and the public. These statements are all completely false.

16. Defendant's defamation is slanderous per se and per quod and libelous per se and per quod.
17. Defendant's defamation has caused Plaintiff mental and emotional distress and injured her reputation.
18. Defendant has stated his intent to continue his defamatory assault on Plaintiff through, among other things, badgering her and her employer and publishing an ad in the newspaper or other media libeling and threatening her. Defendant has acted with actual malice; Defendant has acted with knowledge that the above mentioned defamatory statements concerning Plaintiff were false or has published the above mentioned defamatory statements with reckless disregard of whether they was false or not.
19. As a result of Defendant's multiple defamations of Plaintiff, Plaintiff is entitled to judgment against Defendant for an appropriate amount of actual and punitive damages, as well as an award of the injunctive relief described below. Injunctive relief is appropriate because Defendant's actions are part of a continuing course of conduct and are apparently intended, among other things, to interfere with Plaintiff's job.

FOR A THIRD CAUSE OF ACTION

20. Plaintiff realleges her previous allegations as if fully set forth herein.

21. Defendant has intentionally intruded into the private affairs of Plaintiff including her relationship with her employer.
22. Defendant's communications and false disclosures to the Boys & Girls Club's leadership and others involved with Plaintiff's employment are highly offensive and likely to cause serious mental injury to a person of ordinary sensibilities.
23. Defendant has acted with malice.
24. Defendant has wrongfully and intentionally intruded into the private business affairs of Plaintiff in a substantial and unreasonable manner that is of a nature that would cause mental injury to a person of ordinary sensibilities.
25. As a result of Defendant's invasion of Plaintiff's privacy, Plaintiff has suffered emotional distress, mental upset, and other damages.
26. Defendant has asserted his intention to continue this intentional invasion of privacy with Plaintiff's employer as described above.
27. As a result of Defendant's invasion of her privacy, Plaintiff is entitled to judgment against Defendant for an appropriate amount of actual and punitive damages, as well as an award of the injunctive relief described below

FOR A FOURTH CAUSE OF ACTION

28. Plaintiff realleges her previous allegations as if fully set forth herein.
29. Without justification, Defendant has intentionally interfered with Plaintiff's contract of employment in an effort to have her fired for no just cause.

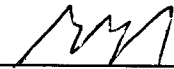
30. Defendant has asserted his intention to continue to interfere with Plaintiff's employment.
31. As a result of Defendant's tortious interference with her employment, Plaintiff is entitled to judgment against Defendant for an appropriate amount of actual and punitive damages, as well as an award of the injunctive relief described below.

FOR A FIFTH CAUSE OF ACTION

32. Plaintiff realleges her previous allegations as if fully set forth herein.
33. Defendant's conduct has caused, continues to cause, and will continue to cause irreparable harm.
34. Defendant has declared his intent to continue his relentless onslaught against Plaintiff by continuing to harass her and continuing the tortious and wrongful conduct described above, including taking out an ad in the local newspaper making false and libelous statements about Plaintiff, all for the purpose of causing her harm emotional, mental, financial, and other harm to Plaintiff.
35. Plaintiff is entitled to temporary and permanent injunctive relief enjoining Defendant from, among other things, harassing Plaintiff, defaming Plaintiff, threatening Plaintiff, interfering with Plaintiff's employment, publishing untrue and malicious statements about Plaintiff, and otherwise inflicting emotional distress on Plaintiff through his outrageous conduct.

WHEREFORE, Plaintiff prays for judgment against Defendant in an appropriate amount of actual and punitive damages, for temporary and permanent injunctive relief,

for the recovery of her costs, and for such further and other relief as the Court deems just and proper.

BY: 

Gregory M. Alford, Esq.
ALFORD & THORESON, LLC
P. O. Drawer 8008
Hilton Head Island, SC 29938
Email: gregg@alfordlawsc.com

G. Trenholm Walker (S.C. Bar #5777)
John P. Linton (S.C. Bar # 79130)
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Post Office Drawer 22247
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843.727.2200
Email: gtw@p-tw.com
Email: jpl@p-tw.com

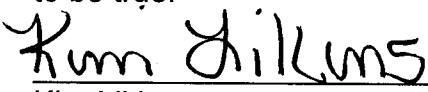
ATTORNEYS FOR PLAINTIFF

Charleston, South Carolina
December 10, 2015


2015 DEC 10 PM 4:24
JERRI ANN ROSENEAU
CLERK OF COURT
CHARLESTON COUNTY, S.C.

VERIFICATION

Kim Likins, first being duly sworn, deposes and says that she has read the foregoing Complaint and that the same is true to her own knowledge, except as to those matters alleged therein upon information and belief, and so to those matters, she believes them to be true.

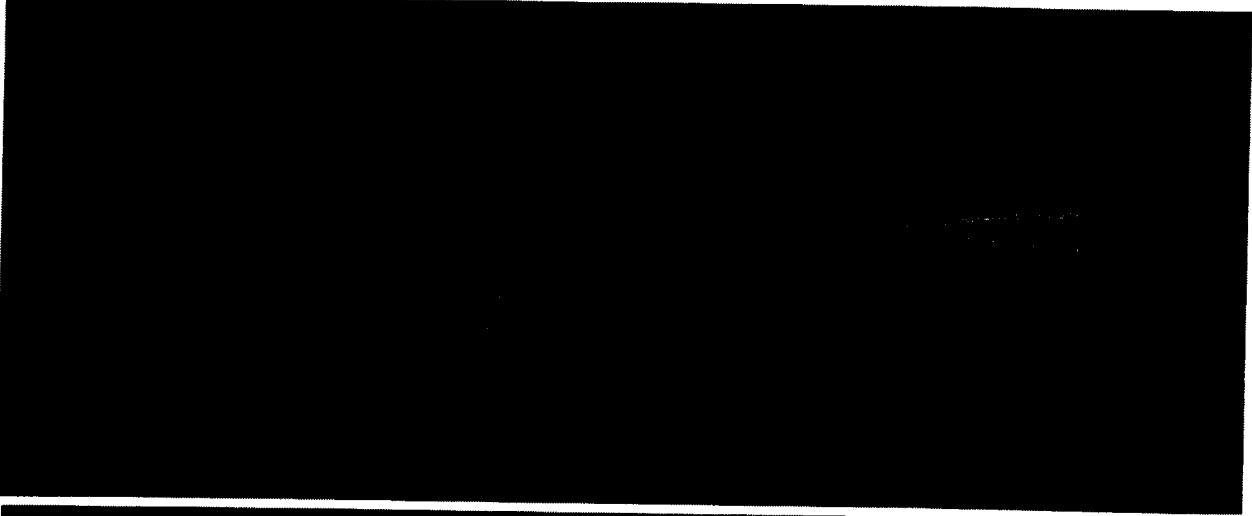

Kim Likins

SWORN to before me this 10th
day of December, 2015.

 (SEAL)
Notary Public for South Carolina

My Commission Expires: _____ My Commission Expires
May 1, 2016

EXHIBIT “A”



From: CC Hoagland [mailto:skiphogland@yahoo.com]

Sent: Monday, November 23, 2015 1:06 PM

To: stever@hiltonheadislandsc.gov; david tigges; Gregg Alford; Hulbert Brian; susan@surfcityusa.com; Taylor Smith; Bill Miles; Ray Deal; Jay Wiendl

Cc: davidb@hiltonheadislandsc.gov; zmurdock@islandpacket.com; Tom Lennox; JohnM@hiltonheadislandsc.gov; Lee Edwards; Likins Kim; WilliamH@hiltonheadislandsc.gov; jeffbradley@schouse.gov; Weston Newton; BillHerbkersman@schouse.gov; tdavis@harveyandbattey.com

Subject: Sc foia

Steve to begin Brian Hulbert your lawyer claims you know nothing about the 4 m proposed welcome center on town property and now know nothing about secret meetings with Susan Thomas and Bill miles discussing signs on town property and the 340k app attempt , cost of signs etc . How could Susan thomas Cced on this email propose this without talking to you ? For me you are not telling the truth and will do anything to escape and avoid answering directly . Susan who did you talk to ? Susan moving to California does not mean you can't be brought back to SC or answer questions . As this moves forward David tigges can only do so much to protect and keep others silent . Steve same for you , the lawyers can only help you so much . God only knows what else you have done over the last 20yrs we don't know about . When you and others realized I was going to attack on these two issues everything stopped and disappeared interesting ????? No records no emails !

Steve, my foia info received was incomplete , where is the supreme court case saying chambers or Dmos or chamber/ DMO comingled hybrid can receive tax monies but not comply with SC foia laws that David Tigges

quoted? Was this a lie or is it true? To add !

Did Jay Weindl lie about 1600 members? I say yes or he was deceived by Bill miles we need proof of this !
Did Kim Likins lie when she said took notes and listened to everyone then proceeded to read a speech that could have been written by her good friend Charlie Clark chamber spokesperson? I say yes! Is she fit to run and girls and boys club ?

Did John McCann when he said he made up his mind last night and 3 other council members as well , did not respect the public hearing and draft contract process? I say yes !

Who drafted this contract the chamber / council or Steve Riley we now know from a whistle blower and Carolyn Vanagel confirmed statement , quote the Chamber worked hard to draft this contract and we now know it was David tiggess in control ! Steve Riley do you wish to deny this ?

We have also been told all board members were instructed by David Tiggess / Bill Miles to remain silent to press or anyone else and to not talk about contract or my fight and only state how good the chamber is and nothing else. Do you wish to deny this ?

Jay Weindl, new "appointed" chairman, not duly elected lied when he said 1600 members all have rights and can run for elections and make change with 10% of membership ,10% of what real number? We have proof chamber membership numbers have been falsified ? Do you wish to deny this or want to challenge this ? Seems all members have rights to the database list of all members and contacts ? Jay will you send that list and contact for each member phone numbers including to a chamber member ? Jay will you force Bill miles as his new boss to open the books to all members ? Jay what rights do members have ? Jay did you know bylaws were changed from original form when members had rights ? Jay will you tell Bill they must be changed back to allow members rights ? Jay where were annual meetings held last 5 yrs ? Do you have all

Minutes for this . I assume in any lawsuit by a member or members all this will be made available in discovery ? You and

David Tiggess both said there was annual meetings for members to speak ? Again Where are these meetings held, minutes Etc ?????

The entire board I am sure are good people, bottom line they have all been deceived and used / abused including you Jay , by the 3 people who totally control this chamber David Tiggess, Bill Miles and Ray Deal. Jay as chairman and Bill miles employees let's be honest who is in charge you , Bill or David tiggess ?

Jay you seem to be a nice guy and have nothing against you . The only actions I don't like from you is kicking out people from your hotel that run a local media company I started many years ago . He did nothing to you . This has also happen by several hotels who told me when I called don't ever call this hotel again . These attacks have no reason or basis . We have been told, by ex chamber whistle blower that you and other board member are silenced by giving help and business over others in their industry. They receive no access to inner circle no access to all accounting, all appointed strategically to surround Bill Miles to make it all look legitimate to allow its abuse, corruption and violations undetected by anyone including board members that just assume all is ok. All local media leaders have been eliminated from appointed board by Bill miles to prevent any challenge to his unfair competitive practices and growing local media empire with 1.7 million and growing ad sales revenue . We now know anyone can buy ads not just chamber members like a for profit media . We were told any board members that question the dictatorship are silenced or removed. There are no real term limits or rotation of power on board to allow all members to run for fair elections. The real power has remained in control for over 20 yrs . Paul Bethea , David tiggess McNair and past old Bethea law firm.

You have a power structure out of control, including letting the employees run all not the members / stake holders who are in essence the owners, not Bill Miles. The old Bethea law firm now McNair law firm have been running this chamber for years and always someone on board from this firm . Insurance, banking, lawyers,hotels etc. etc. all get favoritism over others and we now have proof from whistle blowers who have stepped forward. We now have big insurance companies say they dropped membership as it was a waste of time trying to bid against John vann your past buddy board member with BB&T insurance .

They said just look at the chamber website and app to see who gets promoted over others . Those who pay the most get front seat . Jay this is not the way or purpose of a properly run chamber and DMO operating as a non profit and using tax monies . What do you not understand about this ? How long do you think this board and you can keep defending this ?

We lost a small battle to corruption but the war to clean up this chamber abuse will be won soon ,as we have all we need to prove our case and will turn over all to press , law enforcement , mayor and others next week.

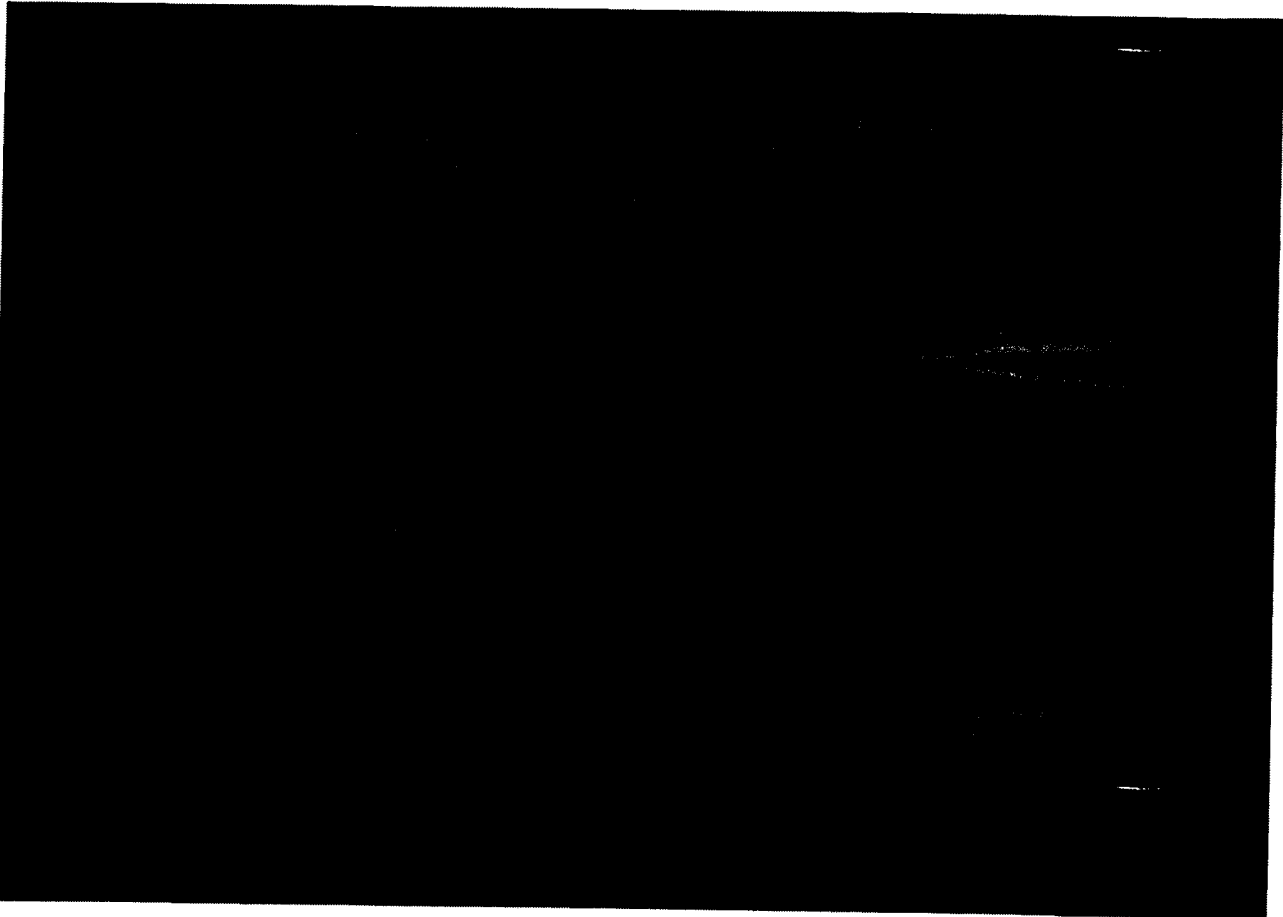
Happy Thanksgiving to everyone. Be assured as we give thanks for all our bounty, this Chamber will go back to being a simple chamber under US Chamber and ACCE national associations guidelines and our DMO will operate under DMAI national association guidelines and accounting protocol soon. All the waste, abuse, corruption, deception, tax violations, foia non compliance, dictatorship and harm to tax payers, board members and members will end. I will be thanked for all this, and not painted as the enemy to this chamber board representing facts and truth. This chamber board is run by good people and leaders on the island, but many others leaders in good standing for 40 yrs do not like where we are. You heard many speak up at our corrupted contract public opinion meeting . Current board members need to pay attention and accept the facts and speak up to clean it up and join those who are and will. This current Chamber structure will never survive what's coming and the good people of this board need to act soon as to not be humiliated for being deceived, tricked and fooled.

We have much more on Bill miles to deal with like 4 million past welcome center , local app with Steve riley , trips to China with his family also turned over my whistle blower who said he robbed us , trips to England , monies to Canada , comingled bank accounts , travel / hotels /meals etc , free golf memberships , corporate entrainment on and off golf course , bills sons golf whistleblower claims is part of corporate entertainment and much more .

Oh and Steve riley one last thing all town codes , RFPs , fair bidding and who added the Hilton head chamber to down code to eliminate fair bids and competition . Lee Edwards remember you once were for this ? Lee if chamber was in landscape business selling plants and you were a member what would you do ? Accept it and say nothing ??????? Thx

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland / CEO
Domains New Media LLC
US cell 843-384-7260
Off. Buenos Aires , Argentina
011-54-9-11-5942-3202



From: CC Hoagland <skiphoagland@yahoo.com<mailto:skiphoagland@yahoo.com>>
Date: November 23, 2015 at 12:12:47 AM EST
To: Likins Kim <KimL@hiltonheadislandsc.gov<mailto:KimL@hiltonheadislandsc.gov>>, <JohnM@hiltonheadislandsc.gov<mailto:JohnM@hiltonheadislandsc.gov>>
Cc: Tom Lennox <toml@hiltonheadislandsc.gov<mailto:toml@hiltonheadislandsc.gov>>, <WilliamH@hiltonheadislandsc.gov<mailto:WilliamH@hiltonheadislandsc.gov>>, Rick Caporale <rpcl@hargray.com<mailto:rpcl@hargray.com>>, "Cynthia Bensch" <cbensch@bcgov.net<mailto:cbensch@bcgov.net>>
Subject: Violated public trust , due process and lied !

You both lied and are not fit to serve . I will look forward to speaking directly to both of you soon at public comment . Also you will be in my full page ads to publicly disgrace you both to this island . Kim you are not fit to serve boys and girls a well . You fully know what you did !!!

Do not dare say I am disrespectful when I speak the truth at town council . The truth is not disrespectful .
What's disrespectful is what you both did . Prepare to be exposed and treated like you treated others .

Tom I feel you also deceived me and had your mind made up also . I have you on record saying you worked hard on the clause to inspect books and had me in mind . I hope so and remains to be seen if you are going to be my new hero and outsmarted David tigges or forced me to keep spending thousands to fight fir sc foia laws for all of us .

Bill Harkins for me not worth even discussing . If he plans on running for reelection as well as others I can promise you that you will be booted and featured in full page ads and fully explained why . There simply is no place for dishonest and deceiving people who wish to serve our community .

David , Lee , Marc each at least showed respect and listened to some very smart people who had great ideas and respected them and their time coming . John Mcann to say reason he decided to award the contact to the chamber was because of all the good people on the board . This had nothing to do with it as the board has be tricked and deceived also and has no power . John knock knock anyone home , you have been told this chamber is run by a dictator crook . The board members are good people just have no power or clue what's going on . They all were appointed , used and abused and shown favoritism to remain silent . They were all instructed to say how great the chamber was and not discuss the contract . We were not there for that we were there to discuss a good contract for the community not just the chamber . We also learned much more from the whistle blower and that is David tigges drafted the contract . You all should be a shamed of what you did . I really thought you old guys like me would have acted differently . I guess that saying is correct "no fool like an old fool " .

You all did not show true guts to fight for an audit when you new damn well we needed to do this and were provided all info why . You all allowed escape but just temporarily . We lost this one battle but not the war to come . When you see what's coming you will perhaps then realize you should have followed the great Ronald Reagan "trust must be verified" and i am afraid will be humiliated and publicly disgraced to this entire community . For the life of me I just don't understand why you would not force an audit , sc foia laws, DMAI accounting and 1 yrs not 5 yrs. The big concern I have for all of you is you have trusted Steve riley , Gregg Alford and brian Hulbert all buddies of Bill miles and david tigges . You all have deceived here as well . The sad thing is you all are part time as is mayor bennett and the town employees run the show and you all are powerless and just do as you are told and instructed by them .

I also think you all will be held liable when this all ends up in the courts and the audit is forced .

We now have a x board chamber member who has turned whistle blower . You will all be shocked what's going to happen next . Kim send this to your friend Charlie Clark spokesperson at chamber . Did she write your prepared speech for you ? John so you came to your brilliant decision night before ? Why do you think so many people came to speak ? Do you feel you dishonored all of us and made a fool of of yourself ? Do you and Kim likins feel you are fit to keep serving ? What made you think all is ok and controlled by the board ?

Happy thanksgiving and perhaps you all will reflect on all this as you spend time with your families and think what kind of world you wish for them , and did you act in good faith in a way you and your family would be proud of . You each have to look in mirror and live with yourselves not me . Thx

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland / CEO
Domains New Media LLC

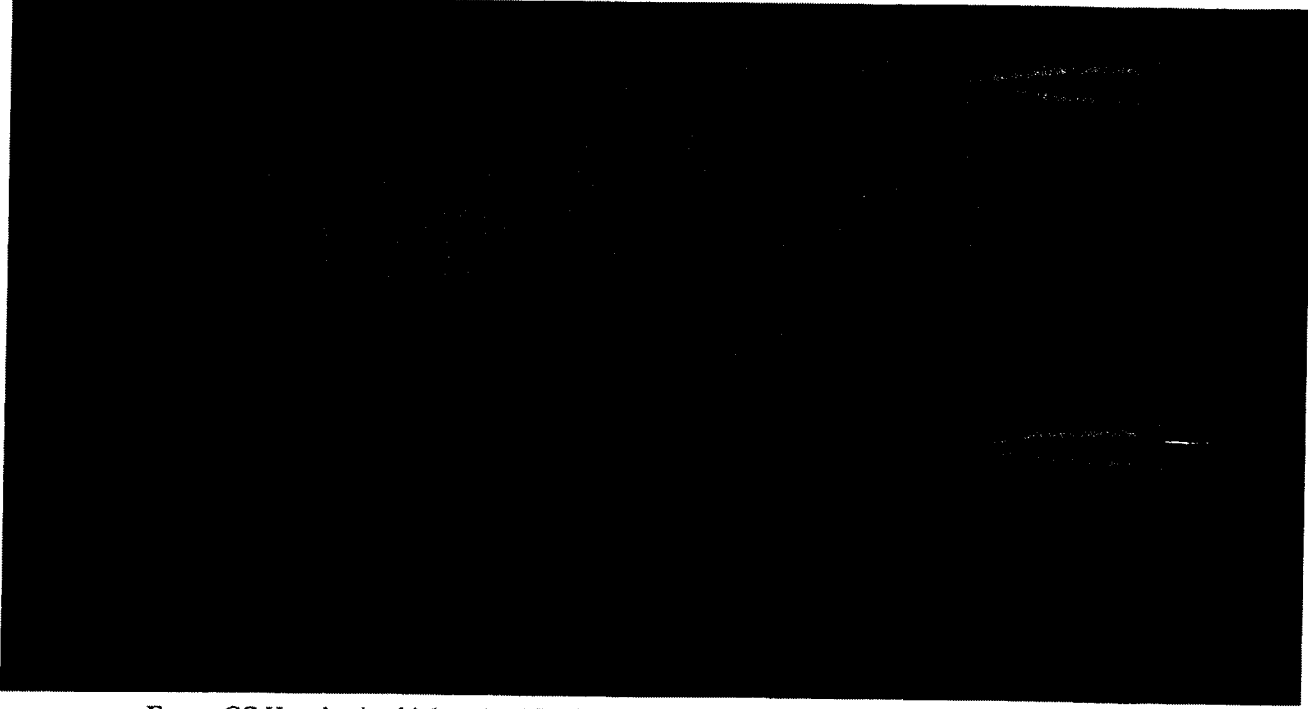
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011-54-9-11-5942-3202<tel:011-54-9-11-5942-3202>

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Any views expressed in this message are those of the individual sender.

This message has been scanned for viruses and spam by McAfee.



From: CC Hoagland <skiphoagland@yahoo.com>
Date: November 29, 2015 at 2:42:47 PM EST
To: david tigges <dtigges@mcnair.net>, bill miles <bmiles@hiltonheadisland.org>, rdeal@hiltonheadisland.org
Cc: davidb@hiltonheadislandsc.gov, LeeE@hiltonheadislandsc.gov, JohnM@hiltonheadislandsc.gov, MarcG@hiltonheadislandsc.gov, Likins Kim <KimL@hiltonheadislandsc.gov>, Tom Lennox <toml@hiltonheadislandsc.gov>, Taylor Smith <Taylor@harrisonfirm.com>, Rick Caporale <rpc1@hargray.com>, sturodman@aol.com, Jerry Stewart <jstewart@bcgov.net>, psommerville@bcgov.net, tvaux@bcgov.net, jeffbradley@schouse.gov, tdavis@harveyandbattey.com, BillHerbkersman@schouse.gov, WestonNewton@schouse.gov, Cynthia Bensch <cbensch@bcgov.net>, zmurdock@islandpacket.com, AHolland@wsav.com, eal@scpolicycouncil.org
Subject: David tigges ???

Explain the praise David Tigges got for doing all Chamber of Commerce work pro bono. I guess that's supposed to make up for the \$45K contract his firm got when he sat on the board of the now-defunct Lowcountry Economic Alliance.

Much more to learn about lawyer Bobby Stepp hired by David tigges to pretend he is not behind all this ????and who is paying this lawyer Stepp?? , who hired him ???? and how much is Stepp charging to defend the Hhi chamber foia lawsuit against me I have to pay out of my pocket ? And where does this money come from Tax payers , members ? Profits from advertising sales ? How about an investigation of David tigges and all fees he received going back 10 yrs on all boards he sits on in sc now or sat on in the past ? Are we to assume all is good here without proof ! David tigges was past chamber board member and needs to be questioned in that capacity , not as a lawyer but leader of the Hhi chamber ,supposed to manage Bill miles , and held

accountable when this all is finally seen and understood if wrong doing and abuse is discovered

Again not one chamber speech at the public hearing was about audit or foia last night , all about how great the chamber is . Xchamber whistle blower has come forward to tell all . David tiggess is in for a huge awakening soon , in fact he is a liar

My inside whistle blower source tells me David tiggess instructed everyone on the board to say how great the chamber is not talk about the contract and to not talk to anyone outside this board . How great the chamber is was not the purpose last night, it was about proper terms for a contract .. I am sure all chamber board members are good people and I do agree we need a great local chamber and a DMO , but both need to be run properly . With the corrupted approval of this contract what we now end up with just means more corruption ahead if not stopped . The abuse and violations approved by 4 incompetent or corrupted town council members that did not hear a word Mayor bennett said or other experts was pitiful . In fact Kim likins lied and John Mcaan as well when he said he had already made up his mind up last night totally abusing and disrespecting public opinions . They are not fit for public office . Older gentlemen who spoke was correct when he said Bill Harkin's and Steve Riley don't know enough about marketing nor the lawyers to even draft this Agreement, which we all know now was drafted by the chamber . One of the board members slipped and said the chamber board worked hard drafting the agreement . So we now know who was lying ?

I submitted a lawyer and CPA opinion and it was again ignored by the 4 incompetent / corrupted lying town council members who are not fit to serve office nor fit for a low level job in my company . Both opinions attached !

Where's this money and all past lawyers payments to David tiggess and others going back 15 yrs with this chamber . No audit just means more escape .

What I wish is David tiggess would file a lawsuit against me so we can start depositions and discovery tomorrow ! One way or the other my foia lawsuit or law enforcement we will one day get these records and I am 100% convinced a Palm beach type result will happen . Thx

Sent from my iPhone excuse all typos and misspellings

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From: CC Hoagland <skiphoagland@yahoo.com>
Date: November 29, 2015 at 4:44:26 PM EST
To: Rick Caporale <rpcl@hargray.com>, bill miles <bmiles@hiltonheadisland.org>, Blakely Williams <blakelyw@beaufortsc.org>, Bluffton Chamber SwH <shellie@blufftonchamberofcommerce.org>, davidb@hiltonheadislandsc.gov, Billy Keyserling <billyk@islc.net>, Lisa Sulka <lsulka@townofbluffton.com>
Cc: "Huffman, Ted" <thuffman@townofbluffton.com>, "Sulka, Lisa" <lsulka@townofbluffton.com>, "Orlando, Marc" <morlando@townofbluffton.com>, jeffbradley@schouse.gov, BillHerbkersman@schouse.gov, WestonNewton@schouse.gov, Scott Thompson <scott.thompson@blufftontoday.com>, zmurdock@islandpacket.com, AHolland@wsav.com, Don Brashears <Tmbdab@aol.com>, Bluffton Chamber SwH <shellie@blufftonchamberofcommerce.org>, Cynthia Bensch <cbensch@bcgov.net>, sturodman@aol.com, Jerry Stewart <jstewart@bcgov.net>, tvaux@bcgov.net, JohnM@hiltonheadislandsc.gov, WilliamH@hiltonheadislandsc.gov, MarcG@hiltonheadislandsc.gov, LeeE@hiltonheadislandsc.gov, Marc Frey <mfrey@freymedia.com>, tom gardo <tomgardo@yahoo.com>, Peter Buonaiuto <peter@hiltonheadvcb.com>, Mare Baracco Deckard <maremailmmm@yahoo.com>, Kevin Meany <kmeany@bfgcom.com>, scott brandon <sbrandon@brandonadvertising.com>, Scott Big Scott Richardson Big Scott <senatorshr@yahoo.com>, jim bradshaw <bradhhi@aol.com>, Jim Richardson <jr@richardsongrp.com>, sarah borton <sborton@islandpacket.com>, David Lauderdale <letters@islandpacket.com>, Brian Tolley <btolley@islandpacket.com>, meyerstcamrealty@gmail.com, Brad Marra <bmarra@palmettodunes.com>, Mike Alsko <mike.alsko@htc.hargray.com>, chip@limehouseprop.com
Subject: Re: Moving forward with funding and 3 local chambers

Rick, I wanted you and everyone to see what I thought was a shocking response from a past elected official. Delete this, sorry I even sent it, not worth our time. We will have much more important issues moving forward. Trust me it will be right up your alley!

Now moving forward with our concerns on both Bluffton and Beaufort, who also hand the Hilton head Bluffton chamber money. I look forward to what will be required and happen in both these cities now. As you know, myself and other experts can help guide this. HHI chamber and corruption won last night , but much more on this later to expose all. We don't mind losing a battle as long as we win the war on what's right .

We will move forward educating on all the abuse and violations we suffer in Beaufort county and waste to our taxpayer's money, which like you is my focus as well. My personal focus is chambers and Dmos ,and get all this cleaned up so others in our state and country ,can use the result of our local laboratory test.

Beaufortwatchdog.org and the Boot Club non-partisan organization will deal with all the rest like Jeff Moss etc. Many others involved in this grass roots non-partisan movement that was created and funded to put the power back into the citizens hands, who have felt powerless to fight corruption like we witnessed last night. David Bennet himself perhaps had a religious experience on what he has been dealing with and the disrespect he was shown after a very moving and heartfelt speech. I have respect for him in some ways but not all. Our difference is I am not trying ,nor want to be nice to people who are abusing and hurting others, and want to expose them much more sternly and harshly than Mayor bennett is willing to do . Mayor bennett failed

all of us , Patrick Henry Ronald Reagan who said trust must be verified !

Fact is simple, every chamber or DMO in Beaufort county must submit to a foia and when asked to submit to an audit do so. Also follow strict accounting procedures, as you know. Our community's did not get this the other night from elected officials who were either corrupted, never read a thing the experts sent them or just plain incompetent, one of the 3 or all 3.

Fact is these 4 council members, violated the public trust and fiduciary responsibility to us all last night, must be voted out of office and replaced with good people like you , willing to stand up to what's right . Several town council members even lied to us. They must get the boot - they are Kim likins, Bill Harkins, Tom Lennox and John Mcann. David Bennet, Marc Grant and Lee Edwards respected the process and taxpayers with an open mind , however failed us with contract provisions , audit and have allowed the town manager and lawyers to control them like puppets . This truth hurts I am sure ! Our system of local government with no power for a mayor or council all controlled by town employees that can't even be fired is not working well !

This fight will continue to clean up the HHI Bluffton chamber on many fronts. My lawsuit to force SC foia compliance by all chambers in SC, win IRS violations tax case against this chamber, stop unfair competitive practices and damages to local media, stop its dictatorial practices and control by one dictator ,and few cronies robbing us all ,and allowing no rights for members to speak up, nor run for elections to serve on chamber board, no annual meetings.

We have educated everyone on how a chamber should be run ,and that perfect example is the Greater Bluffton chamber ,operated as a business-to-business member organization. Also how a DMO should be run separately which we have furnished by experts not Steve Riley or Gary kubic and clueless lawyers .Certainly Bluffton and Beaufort will not sign a 5-year deal with HHI Chamber trying to eliminate any competitive bids from the Greater Bluffton chamber or others to become a separate DMO ? Certainly we will not allow town managers snd lawyers in these cities take us down the same corrupted road ?

What we witnessed the other night with the approval of the Hhi contract will be challenged and was nothing less than massive corruption , a sham with lies, deceit and disrespect to many. If Beaufort and Bluffton lawyers was sitting on sidelines to follow Hhi my suggestion is don't do it ?

What we need is 3 totally separate chambers and not an abusive commingled HHI Bluffton chamber hybrid ,that is plan and simply robbing us all . It's using , abusing , deceiving many respected business leaders and part time board members as puppets that simply don't understand how they are being manipulated by Bill miles and david tiggles . This is not an easy thing to understand for many and has taken me 30 yrs to grasp all of this .

This chamber is getting money from many sources with no audit or accountability to anyone . "Trust must be verified " Ronald Reagan was no fool !

What we need are 3 official chambers each respecting each other's territory. All run like Greater Bluffton chamber. There is never two main chambers in a city only one . Black or Latino chamber different . Lisa sulka has to make a decision soon and herself has been either deceived and tricked , just incompetent or corrupted . She must stop her false happy rhetoric that 2 chambers are ok and can coexist !

- 1 Greater Bluffton chamber
- 2 Hilton Head Island chamber
- 3 Beaufort chamber
- 4 Hardeville chamber
- 5 Ridgeland chamber

Bill Miles and his dictator run chamber must be contained and booted from Bluffton . Once he is, this will end part of the abuse with lots more to do. I have asked to have a lunch meeting with local politicians to fully educate on where we are to get change.

We need separate Dmos for each city open to bids and even run as a city division like 20% in the country operate would be best. HHI

Town council failed us all the other night. Bluffton and Beaufort can fix it.

Here is the real crazy fact, if we had no HHI chamber / DMO ,we would still get 2.0 to 2.5 m tourism, as their overhead and waste with 25 employees 400k salaries in the millions leaves little to promote or move the needle. The fact is residents, their guest / families, repeat visitors, word of mouth, marketing efforts of hotels, resorts and rental companies, our beaches and amenities generate the 2 m tourist year after year not this chamber or DMO ?

In fact, the way it should be done is have a totally separate DMO division of the town run by 2-3 marketing experts , marketing HHI , and with internet and technology, has become much easier. We could also bid out the DMO function like of state agency SCPRT did ,with their 57 m state tax funds to market SC ,to the local ad agency BFG ad agency owned by my neighbor in Windmil Harbour on Hilton head .

The Hilton Head Bluffton Chamber must become just the Hilton Head Island chamber operated like the Greater Bluffton chamber. When this happens Bill Miles' 400k salary and Millions in overhead with 25 employees will end. There is nothing complicated about operating properly and under national chamber and DMO standards. HHI Bluffton chamber plain and simple is not doing this and it is extreme abuse, massive deception and operating like a for profit media not a true chamber like Greater Bluffton Chamber. Ask anyone who runs a chamber and a separate DMO / cvb function Shellie Hodges who runs Bluffton chamber , Palm Beach cvb, Palm Beach chamber, Charleston

chamber, Stillwater Oklahoma cvb, Charleston cvb. Ask any expert if you elect to not believe me.

Hilton Head chamber should have 5 -7 employees max ex dir. salaried at 75 to 100 k max. Our entire SC hospitality association is run with 5 employees !

DMO /cvb separate like Charleston, 5 employees and Ex dir salaried at 75 to 100k Max. or run by the city with 3 employees .

Again, the great options are city function to control all costs, bid out to local ad agencies, like our state did, or set up a separate local cvb / DMO with separate board governance. You must all understand a chamber is purely local, nothing to do with promoting the destination. Chamber should not be in any business whatsoever nor should a DMO with tax monies.

Chamber mission, purpose, charter and intent under proper bylaws is to be purely a local business league owned and operated by its members ,to help its members prosper in the community - that's it ,no advertising sales, no favoring some business over others, board elected from membership with term limits, annual meetings. Chamber can operate business after hours, work shops, business expo, etc.

Tax codes state chambers should not be in any business whatsoever normally carried on by for profit companies and certainly should not compete with members they allowed to join and took their 400 membership dues . Again

A 501-c6 IRS non-profit should not be in any business whatsoever that is normally carried on by for-profits or members. A DMO has one function and one function only to take local tax monies and promote the destination wisely and responsibly under a proper overhead so maximum amount of money goes for the purpose intended to promote the destination. Chamber monies and DMO monies are not intended to be used to launch local apps, websites and other types of for-profit media products to fund 400 k salaries and 25 employees !

Furthermore, all local products and services needed like printing etc. by a chamber and DMO should be bid out or minimum use local companies not take our money to Canada and worse refuse SC foia laws to tax payers, Island Packet and our Mayors. Voluntarily submit to an audit to confirm to city councils and tax payers all is good, transparent and not all done in secrecy with abuse, violations and corruption.

Bill Miles and the HHI chamber are abusing us plain and simple. All we heard the other night from chamber supporters is how good they are and how bad we need them. Not saying these are not all good people and we do need a chamber and DMO ,but we just need it run correctly. Most board member are great people they are just not paying attention, busy with their families and their own business and have just assumed Bill Miles is doing it all right ,and how could it not be, being our local chamber. They all have been tricked , deceived and fooled according to an X chamber board member whistle blower . Chambers have become so ingrained into a community ,people just assume all is ok and serve on the board as a community service. Fact is, more and more people like myself are questioning all this and like Palm Beach resulted in a prison sentence for embezzlement. Highly educated

professionals spoke the other night and gave solid reasons, as I did, on why the contract was flawed and at minimum sign a 1 yr. contract and add proper provisions and were beaten by corruption, incompetence and other great smart people who have simply been misguided and lied to on what's going on. Again, all the part time chamber board and town council just are not willing to be educated or accept the reality on how a chamber and DMO functions. They all just kept saying let's end this go forward with status quo. No one wants to deal with corruption nor do a real audit and discover we have a possible Palm Beach on our hands. In fact we have on record someone who I don't want to expose who said when asked why don't we audit, answer was scared of what we might find!

The only way we will ever fully prove all is with the following two attachments from a lawyer and a CPA I hired to help us. Read attachments that our 4 incompetent town council members ignored.

What we have and got voted on to allow for next 5-10 yrs. was massive insanity, corruption, incompetence and abuse to our HHI community. We all now must step back and look at this deeply and not make the same mistake in Bluffton and Beaufort. Good news is we have experts to help guide us all moving forward. If everyone wants to look the other way and let Bill Miles and others like this lead them down a path of abuse and waste, so be it and it just cause more problems.

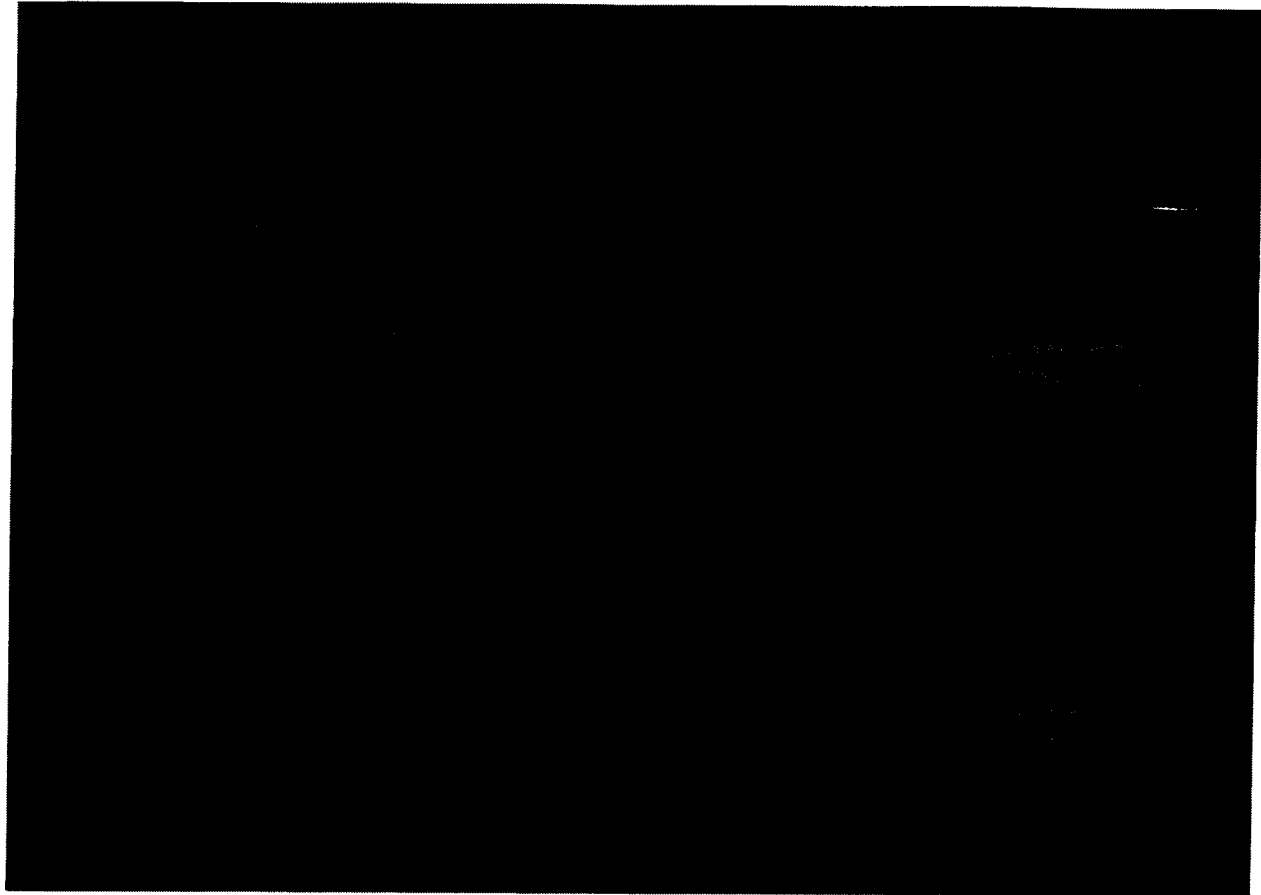
Please be assured we have many more questions and answers needed from Bill Miles, Steve Riley town manager and town

lawyers Brian Hulbert and Gregg Alford that are not being answered under SC foia. We saw a town council member John McCann say he made his mind up last night in total disregard and respect to public opinion and we saw Kim Likins who runs the local Boys and Girls club lie when she spoke and said I have been listening to all and taking notes and then reads her drafted prepared speech from days or weeks before, that could have been drafted by the chamber for all we know for her to read. Whistleblower says she is best friends with Charlie Clark spokesperson at Hhi chamber .

I am trying to think of words for for many that Mayor Bennett will not think disrespectful for my speeches and equals the disrespect and abuse they showed many good people. What I will say is they should be and will be publicly disgraced by my next public speech. I will do all I can to make sure they are booted from office for what they did. I hope where they work and employed are not run by people like me. If they are and worked at my company they would be fired plain and simple. I will show them no mercy for their actions. When you abuse and disrespect others, you deserve the same back. The good news is they all have to look in the mirror and try and pretend they are proud of themselves and live with themselves.

When you leave this earth you only leave with the good and righteous you left behind. If everyone wants facts and truth, I have offered that and offered to even hire the experts to provide this. If you want happy horse manure like we witnessed the other night, status quo, happy deception, back slapping and stabbing , and rather be part of the local incestuous good ole boy club, be popular with everyone, sit on the fence, just gain your own personal interest with self serving ,self dealing actions ,or just want to get re-elected ,I am not perhaps your favorite person to talk to.

Thanks



From: CC Hoagland [<mailto:skiphogland@yahoo.com>]
Sent: Thursday, December 3, 2015 11:44 AM
To: Likins Kim <KimL@hiltonheadislandsc.gov>
Cc: cclark@hiltonheadisland.org
Subject: Kim likins employment

We do not need a anyone who lies and has conflict leading our boys and girls club or serving on town council . Kim I expect two things you either resign or are terminated . I can assure you one of the two will happen . Thx

Further do not even think about running for reelection on town council , this will not be allowed as well . Your friend Charlie Clark in Cced .

Note Charlie Clark lied we have proof , as well as used as a puppet of david tiggess and bill Miles . We have this info and more from inside whistle blower and will become part of our lawsuit and depositions . You both will be deposed .

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland / CEO
Domains New Media LLC
US cell 843-384-7260
Off. Buenos Aires , Argentina
011-54-9-11-5942-3202

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My long war with the Hilton Head Island-Bluffton Chamber and Hilton Head Island Town Council is not over. It's just beginning.

On November 17, the Hilton Head Island Town Council voted -- after hearing from an unprecedented turnout of thoughtful and well-informed protesters -- to approve a five-year contract with the Hilton Head Island-Bluffton Chamber of Commerce to serve as the Town's designated marketing organization (DMO) and promote local tourism. The flawed, weak contract -- which clearly favors the interests of the Chamber over the public interests of transparency and accountability -- is an insult to anyone who even remotely understands the issues involved. The four Town Council members who voted for the contract -- Bill Harkins, John McCann, Tom Lennox and Kim Likins -- in my opinion betrayed the many outspoken opponents of the contract. They also demonstrated quite clearly to me that they are beholden to Bill Miles and other Chamber power brokers who controlled the secret contract negotiation process and drafted a document that favors the Chamber in virtually every respect.

For example, the new contract does not require the Chamber to comply with the South Carolina Freedom of Information Act (FOIA). It does not require a forensic audit to determine that every penny of the \$1.8 million in public funding given to the Chamber this year has been spent efficiently and within the law. And it contains a vague and complex cancellation clause that makes it almost impossible to terminate without years of legal wrangling. Before the vote, Councilmen Lennox, Harkins and McCann -- the three members of the Town Council's Finance & Administrative Committee that I believed conspired with Bill Miles and others to abandon the public interest and let the Chamber off the hook -- assured me personally they would listen with open minds to the public objections at the November 17 meeting and act accordingly. These assurances to me turned out to be lies.

Despite the many criticisms of the contract from respected members of the business community and general public, they turned a deaf ear to the public and voted for the contract.

Kim Likins, known by me to be a close friend of the Chamber public relations manager lied when she said she had listened to all the comments. Not one Board member supported a FOIA compliance provision in the contract or an audit as two important ways to build public trust. Instead, like mindless robots they praised Bill Miles and the Chamber. Three members of the Town Council -- Mayor David Bennett, Lee Edwards and Marc Grant -- had the courage and good sense to vote against the contract. But even they failed to demand that the Chamber comply with FOIA or submit to an audit.

Such gross failures and dereliction of duty -- by the entire Town Council, including Mayor Bennett -- are an insult to my intelligence and the integrity of anyone who cares about this issue.

So now it's time to fight on -- and elevate the cause to a new level.

I am calling on Chamber members and local businesses who do care about this issue to *rise up in revolt* and make their voices heard.

After all, why would Chamber members continue to support an organization that changed its bylaws to strip them of their rights and the ability to vote for a real and responsible Board, as opposed to the hand-selected "buddy board" Bill Miles and others have installed?

And why would local businesses continue to support an organization that competes directly with them every day by selling advertising that depletes local media budgets while the Chamber is being rewarded with tax-free accommodations taxes? Mayor Bennett has claimed to me he cares about the interests of local media companies that are finding it increasingly hard to survive the unfair competition. But during the meeting, he never said a word about those concerns. In short, the Town Council sold out to the Chamber. Period. And they must -- and will -- be held accountable.

The Chamber must be confronted and reformed. Now.

At the same time, there must be significant change at the Chamber. Its basic structure must be addressed in a way that transforms it into a truly democratic and fully transparent organization that shows genuine respect for the law, the public interest, local businesses and taxpayers.

Winning that battle is now the focus of my efforts. When that day finally comes, we the people -- and all Chamber members and local businesses -- will have won a major victory. And I will not relent until that day comes. I hope you will join me.

Please call me at (843) 384-7260 or e-mail me at skiphogland@yahoo.com so we can join forces in this important battle.

Together, we can win. And we will win.

Beaufortwatchdog.org and the "Boat Club" Help us fight corruption in Beaufort County with this non-partisan organization

Send donations to P.O. Box 21787, Hilton Head, SC 29925 or e-mail contact@beaufortwatchdog.org

Your donations help pay our Executive Director and full page ads. Our most important ads will be election time on who voters should "Boat" from office. We do not support anyone. "Boat Club" hats and t-shirts available for donors over \$300. Membership is free! Donations start as little as \$1.00 and up. Beaufortwatchdog.org - By the People, for the People

\$10,000 rewards for whistle blower information paid for by Beaufortwatchdog.org leading to the arrest, conviction and imprisonment of any public official or government employee or non-profits like Chambers who use our public monies.

WORLD GLOBAL CLIMATE CI Leaders, activists gear

By THOMAS ADAMSON

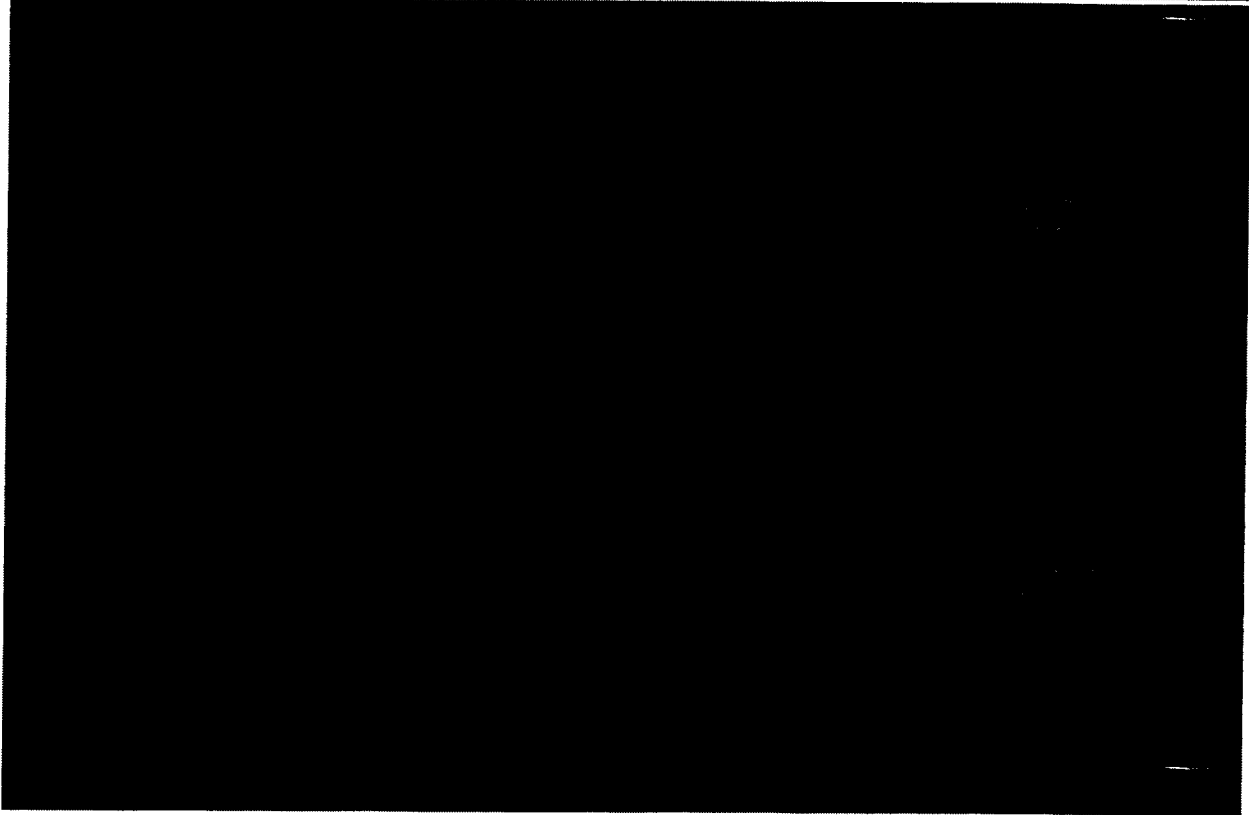
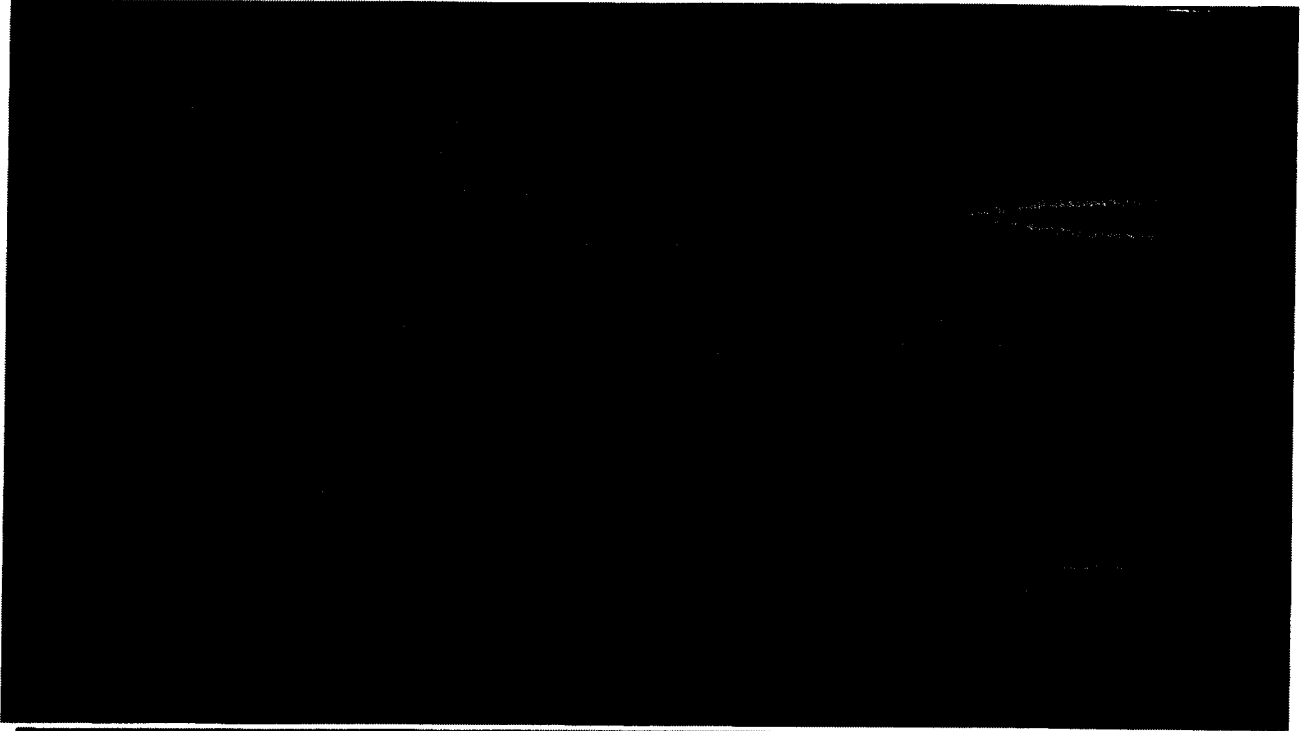
HAMBURG BY CONGRESS, GRASS A TRIBE TO ELIMINATE PARTY

The 193rd session of the U.S. House of Representatives is in session in Washington, D.C. The House is expected to vote on a bill to create a new federal agency to coordinate the nation's response to climate change. The bill, known as the Climate Change Response Act, would establish the Department of Climate Change and Resilience. The bill also would require the department to develop a national climate change strategy and to coordinate the federal government's response to climate change. The bill is expected to pass the House in the coming weeks.

Climate change is a global issue that requires a coordinated international response. The Paris Agreement, signed in 2015, is a landmark agreement that commits 195 countries to limit global warming to below 2 degrees Celsius above pre-industrial levels. The agreement is a key step towards a more sustainable future. However, the agreement is not legally binding, and many countries are still struggling to meet their commitments. The United States is one of the few major countries that has not yet ratified the agreement. The U.S. House of Representatives is expected to take action on this issue in the coming weeks.

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From: Skip Hoagland <skiphoagland@yahoo.com>
Date: August 26, 2015 at 12:20:46 PM EDT
To: John Buchanan <jt看50@yahoo.com>, Lee Edwards
<leedwards@thegreenervinc.com>, Tom Lennox <tomi@hiltonheadislandsc.gov>,
Grant Marc <MarcG@hiltonheadislandsc.gov>, McCann John
<JohnM@hiltonheadislandsc.gov>, Likins Kim <KimL@hiltonheadislandsc.gov>, David
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<sborton@islandpacket.com>, nancy watt <wtghhi@aol.com>, mike mcdonnell
<mike@geoplatforms.com>, stan smith <stansmith6@compuserve.com>
Subject: Re: Appearance by Citizens at Town Council Meetings

I will speak at all meetings listed below !!! I will direct my speeches to mainly Kim likins of the Boys and girls club and Bill Harkins who refuse to accept facts our chamber must be audited . They refuse to talk or take calls on this and openly support the crook Bill miles who has abused this island long enough . I realize I am the only one who is not scared to speak up on facts and happy that am am able to do so in behave of what's right and our entire community . To date not one person has been able to debate me on facts . Kim likins should be ashamed of herself as should others that refuse to do a Palm beach style audit on this chamber to see once and for all if the audit will have same result as Palm beach where the Bill miles and Susan thomas type went to prison for 15 yrs for embezzlement ! Who is right and who do you trust more Bill miles or Skip Hoagland ? An independent forensic audit will prove all . Those who do not support an audit going back to prove violations ,are as guilty as those who have committed any crimes by trying to allow and endorse escape from justice . Thx

Local app 340k attempted robbery town gives 100k this is and was a misappropriation and misuse of funds that also hurts local media and has nothing to do with a Cvb /dmo function . Just the tip of the iceberg on abuse , crimes , violations , unfair competition to local tax paying companies , and abuse to local tax payers and chamber members !

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland / CEO
Domains New Media LLC
US cell [843-384-7260](tel:843-384-7260)
Off. Buenos Aires , Argentina
[011-54-9-11-5942-3202](tel:011-54-9-11-5942-3202)

On Aug 26, 2015, at 11:30 AM, Buchman Lynn <lynnb@hiltonheadislandsc.gov> wrote:

Mr. Hoagland, this is to confirm that you have requested to speak before Town Council under the agenda item "Appearance by Citizens" on the following dates:

Tuesday, September 15, 2015
Tuesday, October 6, 2015
Tuesday, October 20, 2015
Tuesday, November 3, 2015
Tuesday, November 17, 2015
Tuesday, December 1, 2015
Tuesday, December 15, 2015

All of the above meetings are scheduled at 4:00 PM. You have provided me with a contact number of 843-384-7260, and you have indicated you have multiple topics to be addressed. If you are unable to attend one of the above meetings, please let us know by 12:00 Noon on the date of the meeting.

Please keep in mind that in accordance with Town Code your remarks are limited to three (3) minutes, and limited to topics not on the agenda for that meeting. Of course, you will be allowed to speak during the public comments for any topic which appears as an agenda item.

Thank you!

Lynn W. Buchman
Sr. Administrative Assistant - Executive Department
Town of Hilton Head Island
One Town Center Court
Hilton Head Island, SC 29928
Phone 843-341-4700 Fax 843-842-7728
E-Mail: lynnb@hiltonheadislandsc.gov
www.hiltonheadislandsc.gov

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STATE OF SOUTH CAROLINA

COUNTY OF BEAUFORT

Kim Likins

Plaintiff(s)

vs.

C.C. "Skip" Hoagland

Defendant(s)

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2015-CP - 07-2937

Submitted By: Gregory M. Alford, Esq.
Address: P.O. Box 8008
Hilton Head Island, SC 29938

SC Bar #: 6932
Telephone #: (843) 842-5500
Fax #: (843) 842-8400
Other:
E-mail: gregg@alfordlawsc.com

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.

DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete

- JURY TRIAL demanded in complaint.
NON-JURY TRIAL demanded in complaint.
This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules
This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules
This case is exempt from ADR. (Proof of ADR/Exemption Attached)

NATURE OF ACTION (Check One Box Below)

- Contracts: Constructions (100), Debt Collection (110), Employment (120), General (130), Breach of Contract (140), Other (199)
Torts - Professional Malpractice: Dental Malpractice (200), Legal Malpractice (210), Medical Malpractice (220), Previous Notice of Intent Case #, Notice/ File Med Mal (230), Other (299)
Torts - Personal Injury: Assault/Slander/Libel (300), Conversion (310), Motor Vehicle Accident (320), Premises Liability (330), Products Liability (340), Personal Injury (350), Wrongful Death (360), Other (399)
Real Property: Claim & Delivery (400), Condemnation (410), Foreclosure (420), Mechanic's Lien (430), Partition (440), Possession (450), Building Code Violation (460), Other (499)
Inmate Petitions: PCR (500), Mandamus (520), Habeas Corpus (530), Other (599)
Administrative Law/Relief: Reinstate Drv. License (800), Judicial Review (810), Relief (820), Permanent Injunction (830), Forfeiture-Petition (840), Forfeiture-Consent Order (850), Other (899)
Judgments/Settlements: Death Settlement (700), Foreign Judgment (710), Magistrate's Judgment (720), Minor Settlement (730), Transcript Judgment (740), Lis Pendens (750), Transfer of Structured Settlement Payment Rights Application (760), Confession of Judgment (770), Petition for Workers Compensation Settlement Approval (780), Other (799)
Appeals: Arbitration (900), Magistrate-Civil (910), Magistrate-Criminal (920), Municipal (930), Probate Court (940), SCDOT (950), Worker's Comp (960), Zoning Board (970), Public Service Comm. (990), Employment Security Comm (991), Other (999)
Special/Complex /Other: Environmental (600), Automobile Arb. (610), Medical (620), Other (699), Pharmaceuticals (630), Unfair Trade Practices (640), Out-of-State Depositions (650), Motion to Quash Subpoena in an Out-of-County Action (660), Sexual Predator (510)

2015 DEC 10 PM 4:24
JERRI ANN ROSENE AU
CLERK OF COURT
BEAUFORT COUNTY, SC

Submitting Party Signature: [Handwritten Signature]

Date: December 10, 2015

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

FOR MANDATED ADR COUNTIES ONLY

Allendale, Anderson, Beaufort, Clarendon, Colleton, Florence, Greenville, Hampton, Horry, Jasper, Lee, Lexington, Pickens (Family Court Only), Richland, Sumter, Union, Williamsburg, and York

SUPREME COURT RULES REQUIRE THE SUBMISSION OF ALL CIVIL CASES TO AN ALTERNATIVE DISPUTE RESOLUTION PROCESS, UNLESS OTHERWISE EXEMPT.

You are required to take the following action(s):

1. The parties shall select a neutral and file a "Proof of ADR" form on or by the 210th day of the filing of this action. If the parties have not selected a neutral within 210 days, the Clerk of Court shall then appoint a primary and secondary mediator from the current roster on a rotating basis from among those mediators agreeing to accept cases in the county in which the action has been filed.
2. The initial ADR conference must be held within 300 days after the filing of the action.
3. Pre-suit medical malpractice mediations required by S.C. Code §15-79-125 shall be held not later than 120 days after all defendants are served with the "Notice of Intent to File Suit" or as the court directs. (Medical malpractice mediation is mandatory statewide.)
4. Cases are exempt from ADR only upon the following grounds:
 - a. Special proceeding, or actions seeking extraordinary relief such as mandamus, habeas corpus, or prohibition;
 - b. Requests for temporary relief;
 - c. Appeals
 - d. Post Conviction relief matters;
 - e. Contempt of Court proceedings;
 - f. Forfeiture proceedings brought by governmental entities;
 - g. Mortgage foreclosures; and
 - h. Cases that have been previously subjected to an ADR conference, unless otherwise required by Rule 3 or by statute.
5. In cases not subject to ADR, the Chief Judge for Administrative Purposes, upon the motion of the court or of any party, may order a case to mediation.
6. Motion of a party to be exempt from payment of neutral fees due to indigency should be filed with the Court within ten (10) days after the ADR conference has been concluded.

Please Note: You must comply with the Supreme Court Rules regarding ADR. Failure to do so may affect your case or may result in sanctions.