

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Honorable Robert J. Bonds, Circuit Court Judge

Appellate Case No. 2026-001286
Civil Action No. 2026-CP-10-01436

Dr. Brian McClure,
Appellant,

v.

Charleston County School District, Charleston County School District Education Foundation,
Leah Whatley, Michelle Leber, Keith Grybowski, Carlote Bailey, and Pamela McKinney,
Respondents.

APPELLANT’S MOTION FOR JUDICIAL NOTICE

TO THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

Appellant Dr. Brian McClure moves pursuant to Rule 201 of the South Carolina Rules of Evidence (“SCRE”), and Rule 240 of the South Carolina Appellate Court Rules (“SCACR”), for judicial notice of the official issuance, date, authorship, and contents of the South Carolina Office of the State Inspector General’s (“SCOIG”) publicly issued August 2026 report concerning the Charleston County School District Board of Trustees, Case No. 2026-0007-I (the “Report”).

Appellant does not ask the Court to accept as true any reasonably disputed factual finding contained in the Report or to enlarge the evidentiary record on the merits. Appellant seeks only the Court’s recognition that the Report was officially issued and that it expressly identifies FOIA-compliance concerns, including concerns regarding improper quorums and prior warnings concerning FOIA compliance.

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SC Court of Appeals

The requested notice is limited to objectively verifiable matters appearing in an official publication of a state oversight agency and is offered for the limited purpose of informing the Court’s consideration of the necessity, scope, and appropriateness of prospective equitable relief already requested in this appeal. In support, Appellant states:

1. This appeal concerns the April 6, 2026, denial of preliminary injunctive relief and the May 1, 2026, denial of reconsideration in an action challenging the Board’s February 25, 2026, appointment of Michelle Faust to the CCSD Education Foundation. Appellant’s principal statutory argument is that the Board took final action on an unlisted nominee without complying with S.C. Code Ann. § 30-4-80(A).
2. After Appellant filed his Initial Brief, the South Carolina Office of the State Inspector General (“SCOIG”) publicly issued the Report titled Investigation of the Charleston County School District Board of Trustees for Potential Misconduct, Disclosure of Confidential Information and Adverse Fiscal Impacts. The Report bears an August 2026 date and identifies itself as SCOIG Case No. 2026-0007-I. A complete copy of the publicly released redacted Report is submitted as Exhibit A pursuant to Rule 240(c)(3), SCACR.
3. The Report expressly addresses FOIA compliance. Section III.E, at page 6, is titled “Freedom of Information Act Violations – Improper Quorums” and discusses full-Board electronic communications, prior warnings regarding FOIA compliance, and the importance of avoiding deliberations outside properly noticed public meetings. Finding #2, at page 20, likewise identifies improper quorums under S.C. Code Ann. § 30-4-20(d) among the policy violations found by SCOIG and recommends annual Board policy training.
4. Appellant requests judicial notice only of the Report’s official existence, issuance, date, authorship, and the fact that the Report contains the identified statements regarding FOIA

compliance. Appellant does not ask the Court to judicially notice the truth of disputed allegations, to find that any particular Respondent participated in an unlawful meeting, or to conclude that the Report itself establishes the illegality of the Faust appointment.

5. Rule 201(b), SCRE, permits judicial notice of facts that are not subject to reasonable dispute because they are capable of accurate and ready determination from sources whose accuracy cannot reasonably be questioned. Rule 201(f), SCRE further provides that judicial notice may be taken at any stage of the proceeding. The existence and contents of an official SCOIG publication can be verified directly from the publication itself and the agency's official source.
6. The Report is also relevant because it provides official context concerning the governance environment in which the events underlying this appeal occurred. The Report addresses the same Board of Trustees and identifies broader concerns relating to Board governance, compliance with the Freedom of Information Act, improper quorums, and prior notice to the Board concerning its FOIA obligations. Appellant does not ask this Court to treat those investigative conclusions as proof that Respondents committed the particular FOIA violation presented in this appeal, nor does Appellant seek to supplement the merits record with disputed factual findings. Rather, the Report is relevant because it confirms that the State Inspector General, in an official investigation issued after the circuit-court proceedings, independently identified FOIA compliance and Board-governance concerns involving the same public body. That circumstance provides useful context for understanding why the notice and transparency issues presented here are not merely abstract or technical concerns, while leaving the merits of Appellant's specific claim to be decided solely on the record properly before the Court.
7. Appellant's position has been that meaningful public notice and compliance with FOIA's procedural safeguards are necessary to preserve public confidence in the Board's actions. The

subsequent issuance of an official state report identifying continuing FOIA-related governance concerns does not prove Appellant's underlying claim, but it bears on the practical significance of those safeguards and the public-interest context in which the requested relief is considered.

8. The Report was not before the circuit court. Appellant therefore does not contend that the Report belongs in the ordinary Record on Appeal by virtue of this motion. See Rule 210(c), SCACR. Rather, Appellant submits the Report as supporting documentation under Rule 240(c)(3), SCACR, and requests only the limited judicial notice described above.
9. Respondents remain entitled to be heard concerning the propriety and scope of judicial notice. Rule 201(e), SCRE; Rule 240, SCACR. The limited request preserves that opportunity while avoiding any attempt to adjudicate contested facts through judicial notice.

STANDARD

This motion presents an original request for appellate judicial notice rather than a challenge to a lower court's ruling on judicial notice. Rule 201, SCRE, therefore supplies the governing standard.

Rule 201 applies to judicial notice of adjudicative facts. A noticed fact must not be subject to reasonable dispute because it is either generally known within the trial court's territorial jurisdiction or capable of accurate and ready determination from sources whose accuracy cannot reasonably be questioned. Rule 201, SCRE.

A court may take judicial notice on its own initiative and must take judicial notice when a party requests it and supplies the necessary information. Rule 201, SCRE. Judicial notice may be taken at any stage of the proceeding. *Bowers v. Bowers*, 349 S.C. 85, 93 (2002).

The standard is especially exacting when judicial notice is first requested on appeal. Original appellate judicial notice of adjudicative facts is limited to matters that are indisputable

because notice on appeal may deprive the adverse party of an opportunity to contest the matter and may conflict with the principle that appellate review ordinarily is limited to the record. *Masters v. Rodgers Dev. Group*, 283 S.C. 251, 256 (1984). Nevertheless, an appellate court may notice a matter that was not before the lower court when the matter is indisputable. *Wise v. Wise*, 394 S.C. 591, 600 (2011)

ARGUMENT

I. THE OFFICIAL ISSUANCE AND CONTENTS OF THE REPORT ARE CAPABLE OF ACCURATE AND READY DETERMINATION.

Rule 201(b), SCRE, governs judicial notice of adjudicative facts and permits notice of a fact not subject to reasonable dispute because it is either generally known or capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned. Rule 201(d) provides that a court shall take judicial notice when requested by a party and supplied with the necessary information, while Rule 201(f) permits judicial notice at any stage of a proceeding. Rule 201(e) preserves the opposing party's opportunity to be heard concerning both the propriety of notice and the tenor of the matter noticed.

The matters proposed for notice here are narrow and objectively verifiable: 1) SCOIG issued the Report concerning the Charleston County School District Board of Trustees; 2) the Report is dated August 2026 and is identified as Case No. 2026-0007-I; and, 3) the Report contains specific sections addressing FOIA compliance. The Report itself identifies its issuing agency, title, case number, date, scope, methodology, findings, and recommendations. Those attributes can be determined directly from the official publication without resolving a disputed historical fact.

The distinction between noticing the existence and contents of an official publication and accepting the truth of the publication's disputed factual conclusions is central to this motion. Appellant seeks only judicial notice that the report exists. The Court need not determine whether

every underlying event described by SCOIG occurred or decide whether any individual Respondent committed a separate FOIA violation identified by the Report. Appellant only seeks the Court recognize that the State's designated oversight office officially published the identified FOIA-compliance concerns involved the Charleston County School District.

The Report is submitted pursuant to Rule 240(c)(3), SCACR, because it post-dates the proceedings below and is not contained in the Record on Appeal. Appellant acknowledges Rule 210(c), SCACR, which provides that the Record on Appeal shall not include matter that was not presented to the lower court or tribunal. This motion does not seek to place the Report into the record for its merits, but instead to make clear the public interest issue that transcends Appellants' underlying claims.

II. THE EXISTENCE OF AN OFFICIAL, PUBLISHED FOIA-COMPLIANCE CONCERN BEARS ON THE LIMITED PROSPECTIVE RELIEF REQUESTED.

The Report's FOIA discussion concerns the same public body whose compliance with FOIA is at issue in this appeal. At page 6, SCOIG identifies multiple instances of Board electronic communications despite prior warnings, discusses the statutory definition of a meeting, and emphasizes the importance of avoiding deliberations outside properly noticed public meetings. At page 20, SCOIG again identifies improper quorums under FOIA and recommends annual policy training. Report 6, 20.

Appellant does not offer those passages as proof that the Board violated FOIA during the February 25, 2026, meeting at issue here. The likelihood of success question remains grounded in the record developed in the circuit court including the posted agenda, the testimony, the Board meeting materials, and the statutory arguments already presented in the briefs. The Report is relevant because Respondents contend that judicial intervention would be unnecessary or contrary to the public interest. The existence of an official state oversight report expressly documenting

FOIA-compliance concerns provides context for the Court's consideration of whether narrowly tailored prospective relief would protect, rather than disserve, the public interest.

South Carolina FOIA itself reflects the importance of open public business. S.C. Code Ann. § 30-4-15 declares the General Assembly's policy that public business be performed in an open and public manner. Section 30-4-100(A) provides for appropriate equitable relief and states that a violation of the chapter must be considered an irreparable injury for which no adequate remedy at law exists. The requested judicial notice does not alter the elements governing preliminary relief; it simply permits the Court to recognize an official, later-published compliance concern when considering the prospective remedy already requested.

The requested inference is therefore limited. If the existing appellate record establishes the prerequisites for relief, the Report's official issuance and stated FOIA concerns support careful consideration of a narrowly tailored remedy rather than dismissal of the controversy as a purely personal disagreement over an unsuccessful nomination. The Court remains free to determine independently whether relief is warranted and, if so, what relief is appropriate.

III. THE LIMITED REQUEST PRESERVES THE COURT'S INDEPENDENT REVIEW AND AVOIDS EXPANDING THE RECORD.

Appellant does not ask the Court to adopt SCOIG's characterization of the parties, its assessment of disputed events, or its conclusions regarding any separate alleged violation. The legal questions presented in this appeal are whether the Board's February 25, 2026, action complied with S.C. Code Ann. § 30-4-80(A), and whether the circuit court properly denied preliminary relief. These questions remain for judicial determination based on the existing record

and governing law. The requested judicial notice merely recognizes that the Report exists and raises issues related to FOIA.

If the Court concludes that any proposed use of the Report would require resolution of a reasonably disputed adjudicative fact, Appellant respectfully requests that judicial notice be confined to the indisputable matters identified in this motion: the Report's official issuance, date, authorship, and the fact that the Report contains the identified FOIA-compliance statements.

CONCLUSION

For these reasons, Appellant respectfully requests that the Court take judicial notice that the South Carolina Office of the State Inspector General officially issued the August 2026 Report concerning the Charleston County School District Board of Trustees, Case No. 2026-0007-I, and that the Report expressly identifies FOIA-compliance concerns, including improper quorums and prior warnings concerning FOIA compliance. Appellant further requests that the Court consider the existence of that official, published concern solely in evaluating the necessity, scope, and appropriateness of prospective equitable relief already requested in this appeal. Appellant does not seek judicial notice of the truth of any reasonably disputed factual finding contained in the Report and does not seek to enlarge the merits record.

Respectfully submitted,
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Charleston, South Carolina
September 21, 2026

EXHIBIT A

South Carolina Office of the State Inspector General

Investigation of the Charleston County School District Board of Trustees for Potential
Misconduct, Disclosure of Confidential Information and Adverse Fiscal Impacts

Case No. 2026-0007-I

August 2026

Office of the State Inspector General

Brian D. Lamkin



Investigation of the Charleston County School District Board of Trustees for Potential Misconduct, Disclosure of Confidential Information and Adverse Fiscal Impacts

I. Introduction

The South Carolina Office of the State Inspector General (SCOIG) was established by the South Carolina General Assembly in 2012 (Act No. 105) for the purpose of investigating and addressing allegations of fraud, waste, abuse, mismanagement and misconduct in agencies, specifically the executive branch of state government.

The SCOIG's authorities are found in [S.C. Code § 1-6-10 et seq.](#) In 2022, the South Carolina General Assembly passed S. 202 (Act No. 223) that expanded the SCOIG's authority to investigate public schools and school districts, public charter schools and authorizers, and voluntary associations that establish and enforce bylaws or rules for interscholastic sports competition for public secondary schools.

By letter dated [1/15/2026](#), South Carolina Governor Henry McMaster requested the SCOIG to initiate an investigation, review, and analysis of the Charleston County School District (District) Board of Trustees (Board) regarding various allegations and concerns of potential mismanagement, misconduct, violations of state or federal law, or wrongdoing. Specifically, the SCOIG was requested to investigate the District's Board and determine if one or more Board members *"willfully commit[ed] or engage[d] in an act of malfeasance, misfeasance, chronic unexcused absenteeism, conflicts of interest, misconduct in office, or persistent neglect of duty in office"* pursuant to [S.C. Code § 59-19-60](#).

This investigation focused on the broader issues confronting the District in the areas of Board misconduct, disclosure of confidential information, interference with District operations and adverse fiscal impacts caused by one or more Board members. The report is not intended to address every individual complaint or issue conveyed to the SCOIG but provides a road map for the Board members and District leadership to improve in its delivery of quality education to its students in a unified effort.

Notwithstanding, this investigation determined sufficient probable cause existed to recommend that Governor McMaster consider the utilization of S.C. Code § 59-19-60 for the removal of a Board member.

The SCOIG extends its appreciation to District superintendent Anita Huggins, Board chair Pamela McKinney, District staff, and Board members for their cooperation and intentionality of seeking solutions to the issues identified by the SCOIG. The SCOIG also extends its appreciation to current and former teachers and administrators, and to the parents and constituents in the District for the candor, courage and valuable input provided to the SCOIG during this investigation.

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II. Background

A. Predicate

By letter dated [1/15/2026](#), South Carolina Governor Henry McMaster requested the South Carolina Office of the State Inspector General (SCOIG) to initiate an investigation, review, and analysis of the Charleston County School District (District) regarding various allegations and concerns of potential mismanagement, misconduct, violations of state or federal law, or wrongdoing. Specifically, the SCOIG was requested to investigate the District's Board of Trustees (Board) and determine if one or more Board members "*willfully commit[ed] or engage[d] in an act of malfeasance, misfeasance, chronic unexcused absenteeism, conflicts of interest, misconduct in office, or persistent neglect of duty in office*" pursuant to [S.C. Code § 59-19-60](#).¹

B. Scope and Objectives

The scope of the investigation examined the effectiveness and efficiency of the Board with particular focus on intra-Board conduct and relations, District operations, potential Board misconduct and/or interference with District operations particularly in the expenditure of funds and procurement not otherwise budgeted or approved. The investigation focused on the District's Board for leadership related matters that negatively affected the District's ability to conduct, manage, and oversee its affairs in an appropriate and effective manner. The period of review for the Board covered the period of 11/7/2022 through the public release of this report.

C. Methodology

The SCOIG reviewed relevant documentation comprised of Board policies and procedures, District policies and procedures, finance and procurement records, vendor contracts, reports, emails and text messages provided in discovery by the District and other non-District entities.

The SCOIG interviewed Board members (under oath), knowledgeable District staff, members of the public, subject matter experts and people who initiated confidential contact with the SCOIG. In addition, the SCOIG reviewed applicable state and federal laws, regulations and policies.

Reviews and investigations by the SCOIG are conducted in accordance with professional standards set forth by the Association of Inspectors General's *Principles and Standards for Offices of Inspector General*, often referred to as the "Green Book." This investigation used the preponderance of evidence standard.

D. Charleston County School District

The District is the second largest school district in the state and located in Charleston, South Carolina. The District provided a broad range of general and specialized educational services and programs to support academic, career and personal development. The District facilitates instruction for over 51,000 students in 53 Child Development/Head Start facilities, pre-kindergarten through grade twelve in 46 elementary schools, 13 middle schools, 17 high schools and nine charter schools. The District received funding through state appropriations, federal government programs and its local tax base. During the 2025-26 school year, the Day-45 enrollment for the District was 50,538 students, with 23,561 identified as pupils in poverty.

¹ Pursuant to S.C. Code § 1-6-35(A)(1)(B), the Governor may request the SCOIG to investigate a public school district in writing with an articulable basis of any alleged wrongdoing.

Anita Huggins began her tenure as acting superintendent on 9/25/2023 and became District superintendent on 2/6/2024. For the 2025–26 school year, superintendent Huggins supervised 6,804 staff, including 3,826 non-certified teachers, 435 certified teachers and 2,543 administrative and support staff.

III. Board of Trustees

The District was governed by a Board comprised of nine (9) members, each representing a single-member district within Charleston County as defined by South Carolina state law and District policy. Members serve four-year staggered terms to ensure continuity so that not all seats are up for election at one time. During this investigation, Pamela McKinney was Board chair for the 2025-2026 school year, and the Board was constituted as follows:

Board of Trustees	District	Current Term
Keith Grybowski	1	11/2022 - 11/2026
Carolina Jewett	2	11/2024 - 11/2028
Pamela McKinney (Board Chair)	3	11/2022 - 11/2026
Kevin Hollinshead	4	11/2024 - 11/2028*
Craig Logan	4	6/2026 - 11/2028**
Charlotte Bailey (Vice-Chair)	5	11/2022 - 11/2026
Michele Leber	6	11/2024 - 11/2028
Leah Whatley	7	11/2022 - 11/2026
Darlene Dunmeyer-Roberson	8	11/2022 - 11/2028
Dr. Carol Tempel	9	11/2022 - 11/2026

*Kevin Hollinshead resigned on 3/17/2026.

**Craig Logan sworn in on 6/22/2026 following a special election to fill the District 4 vacancy.

The Board operated in accordance with the [S.C. Code - Title 59, Chapter 19 - School Trustees](#) as referenced in the Board policy [BBA Board Powers and Duties](#). The Board had fiscal autonomy to approve and administer the District's budget. The [Board approved](#) an \$868,503,047 budget for the [2025-2026](#) school year.

A. Board Oversight and Roles

A school board's primary duty is to supervise the public school district in compliance with national and state regulations. The Board functioned as a governance committee and established the District's overarching vision and objectives.²

Board members were aligned as to the role of the Board with most of the members in agreement that the most important role of the Board is to hire the superintendent, vote on a balanced budget, and update or create policy as needed. The Board held regularly scheduled meetings to discuss agenda items ranging from evaluation of the superintendent, approval of budgets, acknowledging special recognitions, as well as inviting comments from the public.

² See policy [BA - Board Purpose](#).

B. Board Member Procurement (P-card) Purchases and Travel Expenses

A review of the District's procurement (P-card) purchases for the Board and Board travel expenses did not identify any material issues. The District maintains established procurement and travel policies, and the review found no material deviations from those policies.

C. Board – Superintendent Relationship

The SCOIG reviewed numerous email correspondence forwarded to Board members from the superintendent. This email correspondence ranged from policy clarification, strategic planning, event recognition and constituent concerns, among others.

The SCOIG observed that, while most Board members' email communications with the superintendent were professional in nature, one or more Board members' responses on several occasions reflected a more adversarial tone. Among the examples included:

- "Return to Sender,"
- Direct communication with District staff on constituent concerns, and
- Assertions that the superintendent chastised a Board member and that the superintendent accused a Board member of intimidating or harassing District staff.

Superintendent Huggins is the Board secretary. One of the duties of this position is to notify Board members when Board policies may have been violated, such as an email sent by a Board member as "Reply All" that violates the improper quorum provision within the South Carolina Freedom of Information Act (FOIA) or when a Board member contacts the District's outside counsel in an individual capacity. Board policy BB dictates that Board members "...*acting as individuals have no authority over personnel or school affairs, nor may they bind the district in any way.*" In these instances, superintendent Huggins is acting in the capacity as Board secretary, not as the employee of the Board.

D. Board Decorum and Dysfunction

The SCOIG observed significant communication challenges and a lack of trust among Board members. These communication challenges included multiple Board members' failure to follow policy or communication protocols that caused the Board's inconsistent application of policies and procedures established for the District and Board member behavior and decorum.

The Board failed to follow Board policy [BC - Board Meeting Protocol](#)," which, *inter alia*, provided the following rules of decorum shall be observed:

"Refrain from...

- *Irrelevant, repetitive, overly long comments or comments of a personally attacking nature*
- *Conduct that disrupts or impedes the orderly conduct of the meeting"*

Board member interviews revealed a significant conviction that Board behavior negatively impacted Board governance and operations. Board members showed an apparent lack of respect towards each other that fostered a mutual disregard in making logical board decisions that impact constituents represented by Board members. Some of the Board members accused each other of voting based on political party ties, being bullied, and being criticized for voting against individuals of their own race.

The SCOIG noted that the terms "The Left" and "The Right" were frequently used. It was implied that the Board members made decisions based more on their own political allegiance than on what was best for the students and constituents they represented.

The Board failed to follow Board policy [BCA - Board Member Code of Ethics](#), which, *inter alia*, provided the following rules of decorum shall be observed:

"A board member shall honor the high responsibility that his/her membership demands by doing the following..."

- *Placing children's interest above partisan or other political interests."*

E. Freedom of Information Act Violations – Improper Quorums

The SCOIG identified multiple instances in which one or more Board members used the "Reply All" function to communicate with the full Board regarding District business. These communications occurred despite previous warnings that such exchanges could implicate FOIA by involving a quorum of board members outside a properly noticed public meeting. Under S.C. Code § 30-4-20(d), a "meeting" includes the convening of a quorum by means of electronic equipment to discuss or act upon matters within the Board's jurisdiction. Additionally, S.C. Code § 30-4-20(c) states that communication relating to official public business may constitute public records subject to disclosure under FOIA.

The Board had previously been placed on notice regarding its obligations under FOIA. In [August 2022](#), South Carolina Attorney General Alan Wilson issued a formal warning to the District's Board over FOIA compliance. The District acknowledged violating FOIA and took corrective action. More recently, the Board was again challenged in litigation alleging FOIA violations involving private deliberations and actions taken without proper public notice. Collectively, these events demonstrate that the Board had prior notice of its obligations under FOIA and the importance of avoiding communication that could reasonably be perceived as deliberations outside a properly noticed public meeting.

F. Unnecessary Attorney/Client Consultation Costs

The SCOIG received allegations that one or more Board members improperly caused excessive legal fees to the District. Consistent with South Carolina law, Board policy [BB](#) clearly states:

"All powers of the board lie in its action as a body. Board members acting as individuals have no authority over personnel or school affairs, nor may they bind the district in any way."

The SCOIG analyzed billing records regarding the District's outside legal counsel(s). This analysis – for the period of October 2023 through April 2026 – determined that the District was billed \$74,384.20 related to legal services initiated by a single Board member who acted unilaterally without the consent of the Board body in violation of Board policy BB.

Despite repeated notifications to all Board members to follow Board policy BB the individual Board member continued to contact outside counsel in an individual capacity and caused the District to expend funds for unauthorized legal services. Most recently, the Board chair instructed outside counsel to accept inquiries only from the Board chair or the superintendent to curtail unauthorized expenditures of District funds.

Board policy [BCA](#) states: *"In order to build and maintain productive and effective relationships among themselves and with the superintendent and staff, board members shall maintain a system of communication and interaction that builds upon mutual respect and trust by, among other things: recognizing that authority rests only with the board in official meetings and that the **individual board member has no legal status to bind the board outside such meetings.**"* [SCOIG emphasis]

Board policy [BDG](#) refers to "general counsel" and "outside counsel" as distinct roles. The superintendent appears to be the only person "authorized to communicate" with both. Nonetheless, there appears to be no express authority for any individual Board member to direct "general counsel" or "outside counsel" – absent a function of the "Board" via majority consent. Board policy [BIE](#) provides personal liability protection when acting within the authority of the Board as a body.

Similarly, the District's legal counsel – when communicating with one or more Board members – regularly included a closing remark welcoming further discussion, e.g., *"please do not hesitate to contact me if there are any questions."*

In the absence of clearly defined contractual terms setting clear boundaries with outside counsel and delineation of responsibilities for in-house counsel and outside counsel, the District incurred unnecessary legal expenses. The services performed by outside and in-house counsel duplicated the scope of work intended for in-house counsel. The District paid more than \$6 million to outside counsel for advice to Board members, school personnel, to draft agendas and attend Board meetings from 2022 to June 2026. Nonetheless, the SCOIG recommends certain changes to Board policies to limit any Board member from being able to incur legal expenses when not acting as the Board chair and/or at the consent of the Board as a body.

IV. Unauthorized Disclosure of Confidential Information

A. Disclosure of Executive Session Material by a Board Member

The SCOIG received allegations that one or more Board members improperly shared confidential Board information in violation of Board policy [BCA](#)³ and/or [BE](#)⁴ that included executive session information. Specifically, the allegation was that one or more Board members forwarded otherwise confidential District emails to external email addresses.

Pursuant to S.C. Code § 1-6-50(A) and § 1-6-20(E), the District provided the SCOIG with substantial documentation consisting of email records of District Board members. The SCOIG reviewed the records for evidence that Board members improperly forwarded otherwise confidential and/or privileged materials to external (personal) email addresses. The SCOIG's analysis identified instances in which confidential and/or privileged information was forwarded to external addresses.

Substantial probable cause existed that the alleged disclosure of confidential executive session information was accurate and factored into a federal grand jury indictment of a District Board member for bribery that disclosed confidential Board information to a District vendor. See, Indictment, p. 9, [United States v. Kevin Dion Hollinshead](#), No. 2:26-cr-00174-CRI (D.S.C. March 3, 2026) on the following page.

³ Board policy [BCA](#) stated in part: *"board members shall maintain the confidentiality appropriate to sensitive issues and information, especially those matters discussed in executive session."*

⁴ Board policy [BE](#) stated in part: *"Board members and other persons attending are duty-bound not to disclose matters discussed in executive session."*

34. On or about July 11, 2025, Source 1 and **KEVIN DION HOLLINSHEAD** spoke with Source 1 by telephone about Construction Company's protest. During the call, **KEVIN DION HOLLINSHEAD** revealed that although he was not permitted to participate in a CCSD Board of Trustees executive session about the bid protest, a fellow Board of Trustees member advised **KEVIN DION HOLLINSHEAD** that CCSD intended to offer \$15,000 to settle the dispute.

As indicated in paragraph #34 of the indictment, the grand jurors determined that a fellow Board member participated in the disclosure of confidential executive session information. Regardless, the grand jury found that probable cause existed that substantiated the allegation of disclosure of confidential executive session information by a Board member.

B. Unauthorized Disclosure of Confidential Information to News Media Outlets and District Vendor

An SCOIG review of the District Board members' emails revealed only two instances occurred whereby Board members forwarded items to their personal email addresses. By stark contrast, most of the identifiable forwarded emails were to news media outlets and an established District vendor's email address for Next Level Educational Services, LLC (Next Level) by a single Board member.

The SCOIG confirmed the vendor application for Next Level and determined through the South Carolina Enterprise Information System (SCEIS) that Next Level was a state vendor with SCEIS vendor # 7000243768, owned and operated by the current District Board member, [REDACTED] Trustee X (See below)

Charleston County SCHOOL DISTRICT

PROCUREMENT SERVICES VENDOR'S APPLICATION
(Subject to any state and local laws)
PROVIDE COMPLETED COPY OF W-9
PROVIDE ALL REQUIRED DOCUMENTS

To Be Completed by District
VENDOR NO. _____
ACCEPTANCE DATE: _____

NAME OF COMPANY: Next Level Educational Services, LLC TELEPHONE NUMBER: [REDACTED]
FAX NUMBER: [REDACTED]
E-Mail address: [REDACTED] @gmail.com WEB SITE: www.nextlevel-education.com
DOING BUSINESS AS: Next Level Educational Services

ADDRESS TO WHICH BIDS, QUOTES AND PURCHASE ORDERS ARE TO BE MAILED: [REDACTED] Royal Harbor Road, Hollywood, SC 29449
E-Mail address for Purchase Orders: [REDACTED] @gmail.com

REMITTANCE ADDRESS: (IF DIFFERENT FROM ABOVE) _____ HOW LONG IN PRESENT BUSINESS: 12 years

TYPE OF ORGANIZATION:
INDIVIDUAL _____ CORPORATION ☒ NON-PROFIT _____ (PROVIDE APPROPRIATE DOCUMENTATION)
IF CORPORATION INDICATE WHICH STATE: VA/SC

NAME OF OFFICER(S), OWNER(S) OR PARTNER(S) AND CONTACT(S) IN YOUR ORGANIZATION:
(A) PRESIDENT _____ PRODUCTS ARE SOLD: Educational Support Services
(B) VICE PRESIDENT _____ DELIVERED FOB _____ (IF SO FOB POINT)
(C) SECRETARY _____ INVOICE TERMS (min. net 30) ☒
(D) TREASURER _____ NET WORTH _____
(E) OWNER/PARTNER ☒ [REDACTED] AVERAGE NUMBER OF EMPLOYEES: 2

PERSON AUTHORIZED TO SIGN BIDS, OFFERS, QUOTES AND CONTRACTS:
NAME: [REDACTED] OFFICIAL CAPACITY: CEO TEL. NO. [REDACTED]

LIST TYPE OF EQUIPMENT, SUPPLIES, MATERIAL, AND/OR SERVICES ON WHICH YOU DESIRE TO RECEIVE BID SOLICITATIONS: Educational Support Services, Counseling Dept, organizational management, training, professional development

TYPE OF BUSINESS:
CATEGORY (CHECK ONE)
MANUFACTURER _____ REGULAR DEALER _____
SERVICE ESTABLISHMENT _____ SURPLUS DEALER _____
CONSTRUCTION CONCERN _____ GOVERNMENTAL _____
WHOLESALE _____ EDUCATIONAL ☒ OTHERS _____

BUSINESS ENTERPRISE
SMALL BUSINESS ☒ MINORITY ☒
WOMAN OWNED ☒ AFRICAN-AMERICAN ☒
ASIAN-AMERICAN OWNED _____ HISPANIC _____
NATIVE AMERICAN OWNED _____
MARK ALL THAT APPLY
CERTIFIED: ☒ YES-if yes attach form(s) _____ NO

I certify that information supplied herein is correct and neither the Applicant nor any person in any connection with the applicant is a principal or officer, so far as is known, is now debarred, suspended or otherwise declared ineligible by any agency of the Federal Government, agencies of the State of South Carolina or by Charleston County School District.

Name: [REDACTED]
Title: Owner Educational Consultant
FEIN or SSN: 27-0694211
Business License Number: _____
TIN: 27-0694211

AUTHORIZED SIGNATURE: [REDACTED] ARE ANY FAMILY OR RELATIVES EMPLOYED BY CCSD: NO

Contracts & Procurement Services
3999 Bridge View Dr. N. Charleston, SC 29405, Telephone: 843-566-8138 - Fax: 843-566-1972
(Please print or type; you may mail or fax)

From the District’s perspective, “*****@gmail.com” was not a personal email address but was the registered official contact for a District vendor. Trustee **Trustee X** shared confidential and/or privileged Board information with a vendor (i.e., Next Level), which violated the Board member’s fiduciary duties by giving inside information and afforded the vendor an unfair advantage in a contractual matter with the District.⁵

Tables 1 and 2 set forth instances of unauthorized disclosures by Trustee **Trustee X** involving confidential information and attorney-client privileged communications sent to news media outlets on ten (10) occasions and a District vendor on 28 occasions.

Table 1

	Date	Day	Time	News Outlets Emailed
1	8/4/2023	Friday	4:09:00 AM	<u>Live 5 News: WCSC</u>
2	3/5/2024	Tuesday	9:16:10 AM	<u>The Post and Courier</u>
3	3/5/2024	Tuesday	6:44:53 PM	<u>Live 5 News: WCSC</u>
4	12/5/2025	Friday	12:13:08 PM	<u>Live 5 News: WCSC</u>
5	12/6/2025	Saturday	9:35:20 AM	<u>The Post and Courier</u>
6	12/10/2025	Wednesday	5:18:41 AM	<u>Live 5 News: WCSC</u>
7	12/10/2025	Wednesday	8:00:00 AM	<u>The Post and Courier</u>
8	12/10/2025	Wednesday	4:34:53 PM	<u>The Post and Courier</u>
9	12/10/2025	Wednesday	4:36:53 PM	<u>Live 5 News: WCSC</u>
10	12/10/2025	Wednesday	4:44:32 PM	<u>Live 5 News: WCSC</u>

Table 2

	Date	Day	Time	Email Address
1	2/15/2023	Wednesday	9:30:37 AM	*****@gmail.com
2	2/16/2023	Thursday	9:46:59 PM	*****@gmail.com
3	6/1/2023	Thursday	2:29:39 PM	*****@gmail.com
4	9/21/2023	Thursday	5:52:46 PM	*****@gmail.com
5	1/7/2024	Sunday	4:07:35 PM	*****@gmail.com
6	2/6/2024	Tuesday	4:19:42 PM	*****@gmail.com
7	2/8/2024	Thursday	12:33:55 AM	*****@gmail.com
8	5/16/2024	Thursday	2:17:10 PM	*****@gmail.com
9	5/17/2024	Friday	10:44:02 AM	*****@gmail.com
10	5/19/2024	Sunday	8:17:46 AM	*****@gmail.com
11	5/20/2024	Monday	11:18:20 AM	*****@gmail.com
12	11/20/2024	Wednesday	3:15:17 PM	*****@gmail.com
13	4/22/2025	Tuesday	12:54:34 AM	*****@gmail.com
14	5/14/2025	Wednesday	6:29:38 AM	*****@gmail.com
15	7/29/2025	Tuesday	4:47:50 AM	*****@gmail.com
16	9/8/2025	Monday	11:39:46 PM	*****@gmail.com
17	10/11/2025	Saturday	9:40:32 AM	*****@gmail.com
18	10/22/2025	Wednesday	3:08:48 PM	*****@gmail.com

⁵ See also, United States v. Kevin Dion Hollinshead.

19	12/3/2025	Wednesday	8:51:06 AM	*****@gmail.com
20	12/5/2025	Friday	6:28:23 PM	*****@gmail.com
21	12/7/2025	Sunday	2:40:47 PM	*****@gmail.com
22	12/8/2025	Monday	11:55:42 AM	*****@gmail.com
23	12/9/2025	Tuesday	1:20:52 PM	*****@gmail.com
24	12/10/2025	Wednesday	5:24:59 AM	*****@gmail.com
25	12/10/2025	Wednesday	5:46:59 AM	*****@gmail.com
26	12/10/2025	Wednesday	4:52:45 PM	*****@gmail.com
27	12/10/2025	Wednesday	8:39:01 PM	*****@gmail.com
28	12/10/2025	Wednesday	8:39:24 PM	*****@gmail.com

V. Board Member Violations of Law and Board Policies

A. Conflict of Interest – Violation of the Ethics Act and Board Policies BCB and BCA

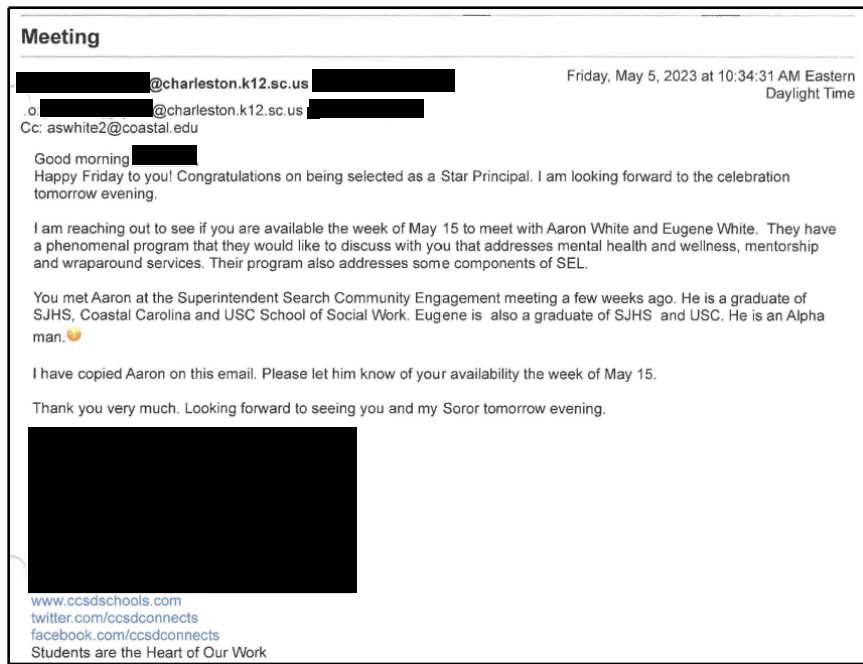
The SCOIG received information that a District Board member violated Board policies [BCB](#)⁶ and/or [BCA](#)⁷ and directly sought to have a District school engage the Board member’s prior campaign manager in a procurement matter. Similarly, according to S.C. Code § 1-6-30(C), the SCOIG received information alleging violation(s) of a statute or rule relating to the purchase of goods or services by a person who had a business relationship with the District, i.e., District vendor # 54611.

The SCOIG reviewed documents provided by the District regarding vendor # 54611, aka, the Circle of Life Foundation (Circle of Life), which operated as a [501\(c\)\(3\)](#) non-profit, but under the professional social worker license of “Aaron S. White, MSW, LISW-CP” that charged the District “\$216 per pupil/hour.”

By email dated 5/5/2023, Trustee **Trustee X** utilized [REDACTED] official District email and directed a District school principal to meet with the vendor and *“let him know your availability the week of May 15”* in further violation of Board policies [BCB](#) and [BCA](#).

⁶ Board policy [BCB](#) stated: “No board member may knowingly use the board member's position to obtain an economic interest for the board member, a family member, an individual with whom the board member is associated, or a business with which the board member is associated.”

⁷ Board policy [BCA](#) stated: “[B]oard members shall maintain a system of communication and interaction that builds upon mutual respect and trust by, among other things: ... refraining from attempting to personally direct any part of the operational organization.”



Records reviewed by the SCOIG demonstrated that Aaron White secured a visit to the school for over five (5) hours because of Trustee [REDACTED] email directive to a District staff member.⁸ The District’s visitation logging system [Raptor] captured the below log entry associated with White.

05/16/23 11:14 AM	05/16/23 5:00 PM	St. Johns High School	Main Office	 
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The SCOIG observed official records that Aaron White was associated with and served as the campaign manager for Trustee [REDACTED] during [REDACTED] 2022 election campaign for a seat on the District’s Board.⁹ The SC Ethics Public Reporting data for the Board member identified the following entries:

Nov 22, 2022	Aaron White	\$8,000.00	961 Hazelwood Lane Summerville SC, SC 29486	Campaign Management Fee		
Aaron White	Quarter 3 & Pre-Election (General) Report 2022	7/24/2022	\$850.00	Expenditure	General - 11/8/2022	Reimbursement for fundraiser catering fee

Trustee [REDACTED] email not only violated Board policy [BCB](#) when as a Board member [REDACTED] “is associated” with the person/vendor seeking an economic benefit from the District, but potentially violated S.C. Code § 8-13-700(B) of the State Ethics Act that states in part...”*No public official, public member...may make, participate in making or in any way attempt to use his office...to influence a governmental decision in which he...an individual with whom he is associated, or a business with which he is associated has an economic interest...*¹⁰

⁸ Per the [Raptor system User Guide](#), p. 55: “By default, Raptor is configured to automatically sign out all visitors 5:00 PM.” As such, whenever the visitor sign out time was precisely “5:00 PM” it was likely because the visitor failed to properly sign out when they left.

⁹ The SCOIG reviewed available South Carolina Department of Revenue records and confirmed the “\$8,000 Campaign Management Fee” was not disclosed as 2022 income by Aaron White.

¹⁰ See generally, State Ethics Commission decision and order, C2014-156, [Griswold v. Loftis](#) (October 26, 2016).

B. Failure to File Multiple South Carolina Tax Returns and Report More Than \$248,000 of Income

In early 2022, Trustee [Trustee X] dba, Next Level (a District vendor) obtained money under false pretenses via fraudulent invoicing scheme(s) as set forth in Section V, Part D of this report.

The W-9 form submitted to the District on behalf of Next Level indicated that although the “*Business name*” was “*Next Level Educational Services, LLC*,” the “*Name (as shown on your income tax return)*” was “[REDACTED] Trustee X”. Similarly, the SCOIG observed EFT payment documents from the District indicated that the “*Pay To the Order Of*” field stated: “[REDACTED] Trustee X DBA NEXT LEVEL EDUCATIONAL SERVICES LLC.” Accordingly, the payments from the District to the vendor were ultimately personal income to “[REDACTED] Trustee X”.

The SCOIG reviewed available South Carolina Department of Revenue (SCDOR) records (as of 8/5/2026) and was unable to conclude that Trustee [Trustee X] properly reported District payments received by Next Level to SCDOR for tax year 2022. Trustee [Trustee X] filed [REDACTED] 2022 tax return (MFJ – married filing joint) with SCDOR on or about 3/28/2024.

Based on a review and comparison of District vendor payments made to Trustee [Trustee X] dba, Next Level and SCDOR records determined that more than \$248,000 in income was not reported to SCDOR based on the following:

- For tax years 2019-2021, Trustee [Trustee X] as a District vendor, failed to file tax returns and report income of more than \$195,400,
- For tax year 2022, Trustee [Trustee X] as a current District Board member, underreported [REDACTED] income by more than \$43,000 when [REDACTED] MFJ tax return was filed on or about 3/28/2024, and
- For tax year 2024, Trustee [Trustee X] as a current District Board member, failed to file a tax return and report income of \$9,600 received as a District Board member.

C. Fraudulent VA Mortgage Loan or Failure to Maintain District Residence?

The SCOIG received information that alleged Trustee [Trustee X] did not reside in Charleston County but in Dorchester County when [REDACTED] filed for a District Board position and was subsequently elected to the District Board in November 2022.

The SCOIG reviewed South Carolina State Election Commission records for Trustee [Trustee X] including FRM 1008-200912 aka “*Statement of Intention of Candidacy*” dated “04/15/2022” at “12:28 pm.” The document, under oath, lists Trustee [Trustee X] address as: “[REDACTED] Royal Harbor Rd Hollywood 29449.”

The SCOIG reviewed publicly available records of the Charleston County [Register of Deeds](#) and identified Trustee [Trustee X] current address of “[REDACTED] Farm House Rd, Ravenel, South Carolina 29470.” However, this search identified additional mortgage documents dated “August 18, 2023” [Book 1199 Page 308] that attested that the legal residence for Trustee [Trustee X] was elsewhere in the state and not within Charleston County prior to the purchase of the residence in Ravenel, South Carolina:

Parties

(A) “Borrower” is [REDACTED], Husband and Wife,
As Joint Tenants with Rights of Survivorship and not Tenants in Common

currently residing at [REDACTED] Dawnshire Ct., Summerville, South Carolina 29485

According to the [Dorchester real property tax records](#), “[REDACTED] Dawnshire Ct., Summerville, South Carolina 29485” was TMS#:1710601011000: a 2-story 2,161 square foot residential property built in 1976 located in Dorchester County.

Additionally, the SCOIG reviewed official public records that identified Trustee [Trustee X] was “a citizen and resident of Charleston County, South Carolina and has been so in excess of one year prior to [9/30/2021]” and established [REDACTED] South Carolina residency before 9/30/2020.¹¹

The SCOIG analysis determined the mortgage documents related to a VA mortgage loan for Trustee [Trustee X] current address in Charleston County identified [REDACTED] residence in Dorchester County for the relevant period leading up to the date of the mortgage, i.e., 8/18/2023.¹² Trustee [Trustee X] own sworn statement on the VA mortgage loan declared that on or about 8/18/2023, [REDACTED] resided at “[REDACTED] Dawnshire Ct., Summerville, South Carolina 29485” and therefore was not a qualified elector for the District. The sworn declaration was made in furtherance of a material transaction, i.e., “\$790,000.00.”

As such, Trustee [Trustee X] either committed VA mortgage loan fraud by attesting [REDACTED] resided in Dorchester County on 8/18/2023 when [REDACTED] actually resided at [REDACTED] Royal Harbor Road, Hollywood, SC (Charleston County), a violation of 18 U.S.C. §1014 (bank fraud) and 18 U.S.C. §1001 (false statement), or [REDACTED] vacated [REDACTED] District Board position when [REDACTED] moved to [REDACTED] Dawnshire Ct., Summerville, SC (Dorchester County) between [REDACTED] November 2022 election to the District’s Board and [REDACTED] purchase of [REDACTED] Farm House Road, Ravenell, SC (Charleston County) on or about 8/18/2023.

[S.C. Att’y Gen. Op. \(June 11, 2021\)](#) explains: “It is this Office’s opinion that a board member of the School District of Pickens County would likewise vacate or forfeit his office by operation of law if she fails to maintain her residence in the district from which she was elected.” See also, [S.C. Code § 7-1-25\(A\) and § \(D\)\(3\)](#).

Serving while disqualified constitutes misconduct in office and persistent neglect of the duties of the office.

D. Fraudulent Billing and Potential Misuse of Title I Funds as a District Vendor

An SCOIG review of the District’s transparency reports identified \$239,103.65 was paid to Trustee [Trustee X] through two service agreements as a District vendor prior to [REDACTED] election to the District’s Board. The service agreements provided educational support services through the school counseling department to assist students with at-risk characteristics and behaviors and determine critical needs of potential high school dropouts to become successful in school. The SCOIG identified the following District service agreements with Next Level:

- [02001484](#), dated 10/25/2019, which stated “*compensation for services during each term or extension thereof, CCSD shall reimburse the Contractor a not-to-exceed fee*” of \$43,200.
- [2100680](#), dated 08/12/2020, which stated “*compensation for services during each term or extension thereof, CCSD shall reimburse the Contractor a not-to-exceed fee*” of \$42,000.¹³

¹¹ Dorchester County Family Court (2021DR181192).

¹² Section (§) 8 of the mortgage documents stated: “Borrower will be in Default if, during the Loan application process, Borrower or any persons or entities acting at Borrower’s direction or with Borrower’s knowledge or consent gave materially false, misleading, or inaccurate information or statements to Lender...” See also, § I.

¹³ Both Next Level service agreement(s) utilized an address at “1805 Clemson Road #290148, Suite 120, Columbia, SC 29229.” Suite 120 did not exist and #290148 was a Post Office Box (PO Box) at the Sandhills Post Office located at 1805 Clemson Road.

Charleston County School District

CHECKS BROWSE

Cash Account	Check #	Check Date	Warrant	Clr	Cleared Da	Amount
00010000 101200	946458	11/07/2019	11/07/19	Y	11/19/2019	2,400.00
00010000 101200	140691	06/09/2022	06/09/22	Y	07/31/2022	23,378.65
00010000 101200	137733	02/24/2022	02/24/22	Y	03/31/2022	20,000.00
00010000 101200	133532	09/09/2021	09/09/21	Y	10/31/2021	13,200.00
00010000 101200	132836	08/12/2021	081221A	Y	09/30/2021	.28
00010000 101200	132724	08/05/2021	080521A	Y	09/30/2021	4,999.72
00010000 101200	131130	05/27/2021	05/27/21	Y	06/30/2021	7,500.00
00010000 101200	130559	05/06/2021	05/06/21	Y	06/30/2021	9,750.00
00010000 101200	129806	04/01/2021	04/01/21	Y	05/31/2021	4,406.25
00010000 101200	129284	03/11/2021	03/11/21	Y	04/30/2021	12,000.00
00010000 101200	128384	02/04/2021	02/04/21	Y	03/31/2021	11,250.00
00010000 101200	127708	01/07/2021	01/07/21	Y	02/28/2021	7,500.00
00010000 101200	127290	12/10/2020	12/10/20	Y	01/31/2021	11,625.00
00010000 101200	126497	11/05/2020	11/05/20	Y	12/31/2020	12,468.75
00010000 101200	125837	10/08/2020	10/08/20	Y	11/30/2020	5,250.00
00010000 101200	125559	09/24/2020	09/24/20	Y	10/31/2020	15,750.00
00010000 101200	125080	08/27/2020	08/27/20	Y	09/30/2020	9,750.00
00010000 101200	124296	07/09/2020	070920A	Y	08/31/2020	9,600.00
00010000 101200	123767	06/04/2020	06/04/20	Y	07/31/2020	13,425.00
00010000 101200	123465	05/14/2020	05/14/20	Y	06/30/2020	5,400.00
00010000 101200	122799	04/02/2020	04/03/20	Y	05/31/2020	7,500.00
00010000 101200	122105	03/05/2020	03/05/20	Y	04/30/2020	8,400.00
00010000 101200	121389	02/13/2020	02/13/20	Y	03/31/2020	9,750.00
00010000 101200	120032	12/19/2019	12/19/19	Y	01/31/2020	6,600.00
00010000 101200	119435	12/05/2019	12/05/19	Y	01/31/2020	7,200.00
Vendor [REDACTED] has 25 checks for: 239,103.65						

The District informed the SCOIG that “[Title 1](#)” funds were utilized for payment of Next Level: “PO#2001484” and split funded between Funds 371 and 201 which are EIA Palmetto Priority and Title I, respectively.¹⁴ Title I funds are statutorily authorized to provide additional educational assistance to children from low-income families to help them meet challenging state academic standards.

The SCOIG reviewed all available District records for Next Level and immediately identified items of concern. For example, the marketing materials provided to the District by Next Level stated: “*NLES is licensed to conduct business in the State of South Carolina by the South Carolina State Corporation Commission.*” No such entity exists in South Carolina government.

1. Fraudulent Line Items on Multiple Next Level Invoices

Invoice #033 dated 5/27/2022, contained multiple late fees related to an “April 18, 2022” invoice(s). Apart from the multiple references for services and/or fees related to “April 18, 2022” on Next Level’s invoice #033 - a 10% late fee applied after 30 days was a violation of section (§) 45 of the District Procurement Code and S.C. Code § 11-35-45(B).

A 10% fee compounded monthly equates to an effective annual rate [EAR] of 216.9% in interest [$\{EAR\} = (((1 + 10\%)^{(365/30)}) - 1)$]. If only 39 actual days had lapsed, yet three (3) compounded 10% monthly late fees were assessed – then the invoice is potentially fraudulent. Invoice #033 was dated (5/27/2022), a mere 39 days from “April 18, 2022.”

¹⁴ The District informed the SCOIG that PO#2202980 used “EIA Priority” funds; PO#2100680 “was Title I funded.”

INVOICE



Next Level Educational Services, LLC
 Educational Consultant
 Royal Harbor Road, Hollywood, SC 29449, UNITED STATES
 Phone: [REDACTED] @nextlevel-education.com;
 Website: www.nextlevel-education.com

Invoice No#: 033
 Invoice Date: May 27, 2022
 Due Date: May 27, 2022

\$23,378.65
 AMOUNT DUE



BILL TO
 [REDACTED]@charleston.k12.sc.us

#	ITEMS & DESCRIPTION	QTY/HRS	PRICE	AMOUNT(\$)
1	Educational Support Services: SJHS Please see invoice dated April 18, 2022	1	\$11,478.33	\$11,478.33
2	Educational Support Services: SJHS Please see invoice dated April 18, 2022	1	\$5,250.00	\$5,250.00
3	Late fee Please see invoice dated April 18, 2022	1	\$1,672.83	\$1,672.83
4	Late fee Late fee for invoice submitted April 18, 2022	1	\$1,840.11	\$1,840.11
5	Late fee Late fee for invoice not paid by May 18, 2022	1	\$2,024.12	\$2,024.12
6	Late fee Late fee for invoice: May 19 - 31	1	\$1,113.26	\$1,113.26
Subtotal				\$23,378.65
Shipping				\$0.00
TOTAL				\$23,378.65 USD

NOTES TO CUSTOMER
 Thank you for your business!

TERMS AND CONDITIONS
 Please make all direct deposits payable to Next Level Educational Services, LLC. A late fee of 10% will be charged for payments not received 30 days after billing date. Next late fee: June 18, 2022

PO 2202980
OK to receive & pay per John Cobb.
6/2/2022

RECEIVED
 JUN 06 2022
 ACCOUNTING

The District identified an earlier version of Next Level's invoice #033 for the SCOIG's review (dated 5/23/2022 and due 5/23/2022) that was for \$22,265.39. There was no item #6 on the earlier version of invoice #033 but was added later. The District provided the following email:

Final Notice for Payment

[REDACTED]@gmail.com [REDACTED]
 To: [REDACTED]@charleston.k12.sc.us
 Cc: [REDACTED]@charleston.k12.sc.us, johne_cobb@charleston.k12.sc.us, JOHNE COBB

Tuesday, May 24, 2022 at 12:11:21 PM Eastern Daylight Time

Mr. [REDACTED]
 Please see the attached updated invoice for payment. This is my final attempt to collect payment from you.

[REDACTED]
 CEO/Educational Consultant
 Next Level Educational Services, LLC
 803.681.0435 (office/cell)
 866.844.4356 (fax)
 email: [REDACTED]@gmail.com
 website: www.nextlevel-education.com

"Education is simply the soul of a society as it passes from one generation to another."
G. K. Chesterson

Attachments:
 Invoice - 033.pdf 129k

The records reviewed by the SCOIG indicated that the amended version of invoice #033 occurred after the vendor informed the District: *“This is my final attempt to collect payment from you.”* The attachment to the email *“Invoice – 033.pdf”* [size *“129k”*] was the version of invoice #033 that did not list line item #6. The properties of the PDF indicated it was created *“5/23/2022 7:43:44 PM.”*

The amended version of invoice #033 (dated 5/27/2022) added an additional 5% after the vendor’s statement: *“This is my final attempt to collect payment from you.”* This represented 10% compounding per *“30 days”* late fee calculations for at least three (3) iterations even though there were only 39 days between 5/27/2022 and 4/18/2022.

Next Level exploited the weaknesses in the District’s accounts payable processes that allowed illegal late fees stacked into items #3, #4, #5, and #6 on invoice #033 after the successful receipt of an illegal late fee on invoice #022. The SCOIG observed that the processing remarks on invoice #033 stated *“ok to receive and pay per John Cobb.”* The District confirmed that Next Level was paid \$23,378.65 for invoice #033 via EFT #140691 on 6/9/2022.

The District informed the SCOIG that the District’s procurement official was on leave pending an investigation for improperly disclosing procurement information to Trustee **Trustee X**. The SCOIG further observed District records indicated that the District official who gave the *“ok”* to pay the illegal late fees was the executive director for federal programs.¹⁵

In addition, Next Level [invoice #029](#) dated 2/23/2022, submitted to the District for *“\$20,000.00”* claimed to be for *“Educational Support Services: SJHS Educational Support Services SY 2021”* without any dates of service indicated on the invoice. The SCOIG observed the following [eight invoices](#) totaled \$87,632.00 from this same vendor claiming services rendered over eleven months in 2021:

- #016 - \$11,250 – January 2021
- #017 - \$12,000 – February 2021
- #018 - \$4,406.25 – March 2021
- #019 - \$9,750 – April 2021
- #020 - \$7,500 – May 2021
- #021 - \$5,000 – May and June 2021
- #022 - \$13,200 – June 2021
- #027 - \$24,525.75 – August, September, October, November, and December 2021

Next Level’s potential fraudulent submission of the invoice(s) and the resulting payment using Title I funds caused a direct waste of educational funds. Next Level caused the District to improperly disburse these funds and deprived eligible low-income students of critical services such as targeted tutoring, instructional materials, and smaller class sizes. This misuse not only adversely affected student academic outcomes but also undermined the program’s core objective of narrowing achievement gaps and exposed education funds to increased risk of waste, fraud, and abuse.

¹⁵ John Cobb, Executive Director for Federal Programs.

2. Effective Annual Rate of 216.9% “Late Fee” Charged by Next Level

The SCOIG analysis identified several areas of concern and questioned the integrity of the vendor’s billing practices. According to the [District Procurement Code](#), and consistent with [S.C. Code § 11-35-45\(B\)](#), the maximum allowable late payment fee is 15% APR. (See below)

SECTION 45. Payment for goods and services received by District. (S.C. Code § 11-35-45)

(A) The District is responsible for the payment of all supplies, services, or information technology within thirty work days after the acceptance of the goods or services and proper invoice, whichever is received later, and shall pay an amount not to exceed fifteen percent per annum, as established by the South Carolina Comptroller General for state agencies, on any unpaid balance which exceeds the thirty work-day period, if the vendor specifies on the statement or the invoice submitted to the District that a late penalty is applicable if not paid within thirty work days after the acceptance of goods or services.

(B) The thirty-day period shall not begin until the District certifies its satisfaction with the received goods or services and proper invoice.

The SCOIG reviewed the service agreements and accompanying extensions between the District and Next Level and determined that two Next Level invoices sought illegal late payment fees totaling \$7,850.32 as depicted on invoices #022 and #033:

INVOICE																															
	Next Level Educational Services, LLC Educational Consultant 1805 Clemson Road, #290148, Columbia, SC 29229, UNITED STATES @nextlevel-education.com; Website: www.nextlevel-education.com																														
Invoice No#: 022 Invoice Date: Jul 12, 2021 Reference: Purchase order# 2100680 Vendor# 45482 Due Date: Jul 12, 2021	 \$13,200.00 AMOUNT DUE																														
BILL TO me*****@charleston.k12.sc.us																															
<table border="1"><thead><tr><th>#</th><th>ITEMS & DESCRIPTION</th><th>QTY/HRS</th><th>PRICE</th><th>AMOUNT(\$)</th></tr></thead><tbody><tr><td>1</td><td>Educational Support Services: NCHS Dates of Services: June 1 – 30, 2021</td><td>16</td><td>\$750.00</td><td>\$12,000.00</td></tr><tr><td>2</td><td>Late fee Payment for August 2020 and June 2021</td><td>1</td><td>\$1,200.00</td><td>\$1,200.00</td></tr><tr><td colspan="3">Subtotal</td><td></td><td>\$13,200.00</td></tr><tr><td colspan="3">Shipping</td><td></td><td>\$0.00</td></tr><tr><td colspan="3">TOTAL</td><td></td><td>\$13,200.00 USD</td></tr></tbody></table>	#	ITEMS & DESCRIPTION	QTY/HRS	PRICE	AMOUNT(\$)	1	Educational Support Services: NCHS Dates of Services: June 1 – 30, 2021	16	\$750.00	\$12,000.00	2	Late fee Payment for August 2020 and June 2021	1	\$1,200.00	\$1,200.00	Subtotal				\$13,200.00	Shipping				\$0.00	TOTAL				\$13,200.00 USD	
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TOTAL				\$13,200.00 USD																											
NOTES TO CUSTOMER Thank you for your business!																															
TERMS AND CONDITIONS Please make all direct deposits payable to Next Level Educational Services, LLC. A 10% late fee will be charged for payments not received 30 days after billing date.																															

For invoice #22, line item #1, in the amount of \$12,000, was for “Dates of Services: June 1 – 30, 2021.” This line item claimed 16 days at \$750 per day for the period of 6/1-30/2021. However, [invoice #021](#), dated 6/22/2021, included eight days of service for June 2021 (6/3-4, 10-11, 16-19/2021). The SCOIG concluded there is a high risk that the District may have been billed twice for days of alleged service in June 2021 (16 days for invoice #022 and 8 days for invoice #021 for a total of 24 days in June 2021).

For invoice #022, line item #2, a late fee in the amount of \$1,200 was assessed for August 2020 and June 2021. The SCOIG determined the \$1,200 was simply 10% of the \$12,000 for line item #1. The description of line item #2 referenced a payment for “August 2020 and June 2021.” The SCOIG determined the following:

- [Invoice #010](#), dated 8/19/2020, was for 13 days of service at \$750 per day (\$9,750) for the period of 8/3-7, 10-14, 17-19/2020. The District’s records show that Next Level was previously paid for invoice #010 in August 2020.
- [Invoice #011](#) dated 9/18/2020, was for eight days of service in August 2020 at \$750 per day (\$6,000) for the period of 8/20-21, 24-28, 31/2020. The District’s records show that Next Level was paid for invoice #011 in September of 2020.¹⁶

No documentation existed that supports or substantiates the legitimacy of a vendor charging the District a late fee for a payment that was actually paid approximately ten (10) months earlier in August 2020. Additionally, no documentation existed that supports a “late” notice on 7/12/2021 for alleged services rendered in June 2021 when June 2021 was invoiced twice by [invoice #021](#) dated 6/22/2021 and again by [invoice #022](#) dated 7/12/2021 – even assuming a 10% per month late fee was acceptable.

E. Improper Procurement Process Associated with Board Member – Circle of Life Foundation

As previously established in Section V, Part A of this report, the campaign manager for Trustee **Trustee X** was affiliated with Circle of Life, a District vendor. Circle of Life was a Summerville, South Carolina-based nonprofit organization registered on 3/29/2023. The organization offered mentorship, mental health and wellness, and wraparound services to underserved communities. Aaron White served as the executive director/president, with Eugene White serving as vice-president.

On 1/12/2024, the District advertised solicitation [P2419](#) for “*Student Services for Mentoring, Academic Support and Mental Health Wellness*” for at-risk students for holistic, individualized support plans designed for youths with complex behavioral or mental health challenges.

The SCOIG determined there was no executed contract and therefore no “contractual parameters.” The District advised the SCOIG that: “*They issued an [intent to award](#), but no contract was awarded.*”¹⁷ As one District employee questioned: “*When I look at this proposal, (20-30 students between St. John's and Haut Gap), I don't see anything unique that Mr. White would be doing that our internal staff couldn't already do? (including direct services). Do you?*”¹⁸

A summary analysis of the Circle of Life procurement identified the following improper procurement practices:

- **Violation of District procurement code and S.C. Code §§ 11-35-20 and 11-35-30**
 - S.C. Code §§ 11-35-20, 11-35-30 requires good faith, fairness, and ethical conduct.
 - Aaron White visited a District school for several hours on 1/26/2024 (during the open RFP period) and submitted a revised proposal afterward—an opportunity not afforded other offerors in violation of the District’s procurement code and RFP non-contact rules.
- **Improper use of public resources – vendor obtained testimonial from a District employee**
 - Aaron White solicited a letter of support from a District employee using District resources and included it in the official RFP response—an improper use of public resources.
- **Invoice payment discrepancies and inflated charges**

¹⁶ The total for invoice #011 was \$15,750; 8 days in August and 13 days in September 2020.

¹⁷ The District explained that the “*procurement official resigned in the midst of an investigation partially related to [Circle of Life].*”

¹⁸ [Email dated 7/20/2023](#) @ 4:51:37 AM from District executive director of Student Support Services.

- Circle of Life received a total of \$64,584 (299 pupil-hours at \$216) for group session services that were billed per student – an effective rate up to nine (9) times the South Carolina Department of Health and Human Services (SCDHHS) group psychotherapy benchmark of \$23.78 per person/hour.
- On one verified date (3.8 hours on site), the invoice charged \$1,944 versus an SCDHHS group-psychotherapy benchmark of approximately \$813—a 139% markup. Arrangement lacked adequate documentation and oversight to prevent inflated charges to public funds.
- Multiple billed dates had no corresponding visitor-log entries.
- **Failure to conduct background checks of all vendor employees in contact with students**
 - Circle of Life (registered only in March 2023) provided no background checks, insurance, and evidence of prior successful implementation as required by the RFP; a failure of compliance with RFP provisions.
 - No evidence existed that the District conducted background checks, obtained parental consent, or executed a formal contract.
- **Public access to student protected information**
 - A Google Drive link was created at the vendor’s request that shared a publicly accessible information of full student names, parent contacts, schedules, and sensitive behavioral/family notes that remained accessible to the public through the URL in violation of the Family Educational Rights and Privacy Act (FERPA); links were deactivated only after SCOIG notification.
- **Exploitation of District student photos and student client testimonials**
 - Vendor’s performance report contained student photographs and handwritten testimonials that were obtained without documented FERPA releases.
 - Solicitation of testimonials from current minor clients in a school setting violates National Association of Social Workers, American Counseling Association, and South Carolina social-work ethical standards.
 - Vendor met with students alone on District property with no staff present and no background checks on file.
- **Inure to the benefit of any private shareholder or individual**
 - The vendor misrepresented District payments on IRS Form 990 as “*payroll*” contributions rather than invoiced services.
 - Aaron and Eugene White were the sole officers and the individuals that delivered the services to the District.
 - High risk of impermissible private inurement under [501\(c\)\(3\) rules](#).

VI. Findings and Recommendations

Finding #1: The SCOIG identified acts of malfeasance, misfeasance, conflicts of interest, policy violations, misconduct in office, and neglect of duty in office demonstrated by Trustee **Trustee X** in the following areas:

- Disclosure of executive session information
- Disclosure of confidential and/or privileged Board information to news media outlets and a District vendor
- Violation of the Ethics Act and Board policies/Use of Board position for personal gain
- Failure to report taxable income as a District vendor and Board member
- Failure to participate in the evaluation process of the superintendent
- Fraudulent billing of services as a vendor of the District

- Fraudulent VA mortgage loan and/or violation of the residency requirement for a school board member

Taken together, the actions demonstrate willful misconduct in office and persistent neglect of Trustee **Trustee X** fundamental obligations of loyalty, confidentiality, and impartial governance. Under [S.C. Code § 59-19-60](#), such conduct furnishes grounds for the Governor to remove Trustee **Trustee X** after notice and an opportunity to be heard.

Recommendation #1: The SCOIG recommends that pursuant to the provisions of [S.C. Code § 59-19-60](#), the Governor consider removing Trustee **Trustee X** from the District's Board of Trustees.

Finding #2: The SCOIG identified repeated violations of Board policies by one or more Board members, inadvertent and/or intentional, irrespective of advice given by legal counsel to adhere to Board policies and repeated notifications provided by the Board secretary. Among these policy violations are:

- Direct contact with District staff in operational matters.
- Direct contact with District staff in procurement matters.
- Direct contact with outside legal counsel in an individual capacity that incurred costs to the District in violation of Policy BB.
- Irrelevant or disruptive behavior in Board meetings in violation of policies BCA and BC.
- Improper quorums in violation of S.C. Code § 30-4-20(d) of the FOIA.
- Unauthorized disclosure of confidential information in violation of Policy BE.

Recommendation #2a: The SCOIG recommends that all Board members receive annual training on all Board policies with particular emphasis on their oversight and fiduciary roles, duty of confidentiality and policies BE, BCA and BC.

Recommendation #2b: The SCOIG recommends the District provide members with guidance and caution against Board members directly or indirectly lobbying for vendors or others who seek to do business with the District.

Finding #3: The SCOIG determined the contractual agreement between the District, and its outside legal counsel was ambiguous in its language that allowed one or more Board members to engage the outside counsel in an individual capacity that resulted in the expenditure of more than \$74,384 by the District without the consent of the Board body in violation of policies BB and BIE.

Recommendation #3: Based on the review of the current District policies, the SCOIG recommends the following changes to improve District Board policies:

- The SCOIG recommends the District modify its existing contract with outside counsel and Board policy to prohibit any individual Board member from being able to incur legal expenses when not acting as the Board chair and/or at the consent of the Board as a body.
- The SCOIG recommends that the District set clear legal boundaries describing who is primarily responsible for categories of legal work, i.e., internal or outside counsel.
- The SCOIG recommends that the District designate who will advise the Board regarding meetings and any conflicts that may arise, i.e., internal or outside counsel.

Finding #4: The SCOIG determined that confidential and/or attorney-client privileged Board information was disclosed to a vendor and the media by one or more Board members which violated their fiduciary duties. The

integrity of the District's information control was compromised by these disclosures and violated District policies BCA and BE.

Recommendation #4: The SCOIG recommends the Board amend policy BCA to incorporate explicit and binding rules for verified allegations of wrongdoing by Board members.

Finding #5: The SCOIG identified numerous examples of unlawful billing practices by two vendors that maintained a business affiliation with a Board member, i.e., Next Level Educational Services, LLC (Next Level) and Circle of Life Foundation (Circle of Life). A review of the District's procurement records for these two vendors identified double-billing errors, exorbitant late-fee billings, and undue influence by a Board member through direct contact with a District principal, all in violation of the District's procurement code, policy BCA and the State Ethics Act.

Recommendation #5a: The SCOIG recommends that District procurement and finance personnel receive remedial training as to what is acceptable for the District to pay.

Recommendation #5b: The SCOIG recommends that the District engage a qualified forensic auditor to evaluate all the invoices and payments for Next Level to ensure the District's payments were proper. Additionally, the SCOIG recommends that the District pursue all legal remedies that may be available to recoup any improper charges.

Recommendation #5c: The SCOIG recommends that the District consider any applicable debarment procedures relating to any vendor that may have willfully violated the procurement process.

Recommendation #5d: Pursuant to S.C. Code § 1-6-40(B), the SCOIG shall refer this matter to the appropriate law enforcement and prosecuting authority to ascertain whether a violation of S.C. Code 16-13-240 [*Obtaining Signature or Property by False Pretenses*] occurred if the submission of a fraudulent invoice resulted in the improper disbursement of \$43,378.65 in public funds.

Finding #6: During the review of the Circle of Life procurement review, the SCOIG identified weaknesses in its vetting process while the vendor was engaged with District students. These weaknesses included:

- Background checks were not conducted of Circle of Life staff.
- District staff did not observe the engagement of Circle of Life staff and District students.

Recommendation #6: The SCOIG recommends that the District consider the following:

- Re-evaluate the District's background check process and procedures for vendors to ensure that background checks are fully conducted both at the outset of engagement and at least annually for outside vendors who enter school grounds during school hours and particularly when engaging with students.
- Adding language to any vendor contract that a vendor confirms it is in full compliance with all applicable licensing and tax reporting.
- Re-evaluate the District's processes and procedures whenever a vendor seeks to meet with students (individually or as a group) alone without any observation by District staff.
- Analyze the implications of this counseling service and – if warranted – report gross violations to the appropriate professional licensing board.

- Pursue a refund from this vendor if the services were not rendered in compliance with applicable ethical standards.
- Notify the parents of the students who may have certain remedies if the services did not comply with applicable ethical standards.
- Require all District employees and Board members to execute an annual attestation that they do NOT have any affiliation or financial benefit from any District vendor/contractor.

VII. Summary Justification for Removal of a Board Member

The suspension or removal of an elected or appointed official from office by the Governor of South Carolina occurs after the individual has been charged with a felony crime. This authority is set forth in Article VI, Section 8 of the South Carolina Constitution. During his tenure in office, Governor McMaster issued 31 suspensions/removals of elected or appointed officials and rescinded seven of these. Two suspension/removals and two reinstatements were attributed to public school board members.

In 2022, S.C. Code § 59-19-60 was amended to provide authority to the Governor for the removal of school district trustees for certain enumerated provisions. [S.C. Code § 59-19-60](#) (Removal of trustees; vacancies) states as follows:

*Notwithstanding any provision of law to the contrary, school district trustees who wilfully commit or engage in an **act of malfeasance, misfeasance, chronic unexcused absenteeism, conflicts of interest, misconduct in office, or persistent neglect of duty in office** [SCOIG emphasis], or are deemed medically incompetent or medically incapacitated, are subject to removal by the Governor upon any of the foregoing causes being made to appear to the satisfaction of the Governor. Before removing any such officer, the Governor shall inform him in writing of the specific charges brought against him and give him an opportunity on reasonable notice to be heard. Vacancies occurring in the membership of any board of trustees for any cause shall be filled for the unexpired term in the same manner as provided for full-term appointments.*

A. Summary of Violations of Unauthorized Disclosures, Board Policies, Federal And State Laws

Subject: **Trustee X** | Charleston County School District (CCSD) Board of Trustees

#	Allegation	Applicable Law / Policy	Occurrences / Period	Source & Key Evidence
1	Unauthorized disclosure of confidential / attorney-client privileged information	<ul style="list-style-type: none"> • Common Law Misconduct in Office and/or S.C. Code § 8-1-80 (Misconduct of Public Officers) • Board Policy BCA – Board Member Code of Ethics 	38 occurrences Feb 2023 – Dec 2025	Emails forwarded to news outlets (10) and a vendor email address (28)
2	Unauthorized disclosure of Executive Session discussions and communications	<ul style="list-style-type: none"> • Board Policy BCA – Board Member Code of Ethics • Board Policy BE – Board Meetings Policy 	Not separately quantified	Closely related to Allegation 1; specific instance-level detail not provided in source data

3	Conflict of interest / ethics violation / use of Board position for personal gain	<ul style="list-style-type: none"> • S.C. Code § 8-13-700(B) • Board Policy BCA – Board Member Code of Ethics • Board Policy BCB – Board Member Conflict of Interest 	May 5, 2023	Email from Trustee X to CCSD principal
4	Disruptive conduct during Board meetings	<ul style="list-style-type: none"> • Board Policy BC – Board Meeting Protocol • Board Policy BE – Board Meetings Policy 	Nov 3, 2025 Feb 25, 2026	11/3/2025 Regular & Special Called Meeting video (~4:50) – parliamentary issue 2/25/2026 Board Meeting video (2:50:36) – Education Foundation Nominee 2/25/2026 Board Meeting Minutes Item 12.B
5	Failure to file taxes and related tax violations	<ul style="list-style-type: none"> • S.C. Code § 12-54-43 (Failure to File) • S.C. Code § 12-54-44 (Willfulness) • S.C. Code § 12-54-155 (Under Reporting) • S.C. Code § 8-1-100 (Removal for Indictment) 	2019–2022: \$238,703.65 2024: \$9,600.00	Tax records and Vendor invoices (District payments to Trustee X, d/b/a Vendor)
6	Refusal to participate in Superintendent evaluation	<ul style="list-style-type: none"> • Board Policy BBA – Board Powers and Duties • Board Policy CBI – Evaluation of the Superintendent • S.C. Code § 59-19-80 • S.C. Code § 59-19-90 	May 23, 2026	Email from Trustee X
7	Fraudulent billing as a District vendor	<ul style="list-style-type: none"> • District Procurement Code • S.C. Code § 11-35-45(B) • S.C. Code § 16-13-240 	Invoice #022 – 7/12/2021 Invoice #029 – 2/23/2022 Invoice #033 – 5/27/2022	Invoice #022 Invoice #029 Invoice #033
8-A	Mortgage Fraud / Conspiracy to Commit Mortgage Fraud - Alternative Residency Issue(s)	18 U.S.C. § 1014 (bank fraud) and 18 U.S.C. § 1001 (false statement)	Aug 18, 2023	Charleston County ROD Book 1199 Page 308
8-B	Violation of the residency requirement for Board membership - Alternative to Mortgage Fraud	<ul style="list-style-type: none"> • S.C. Code § 7-1-25(A) and (D)(3) • S.C. Const. art. XVII, § 1 and art. VI 	2023 – 2026	Residency status throughout the relevant period - Charleston County ROD Book 1199 Page 308

Additional Observations & Context

• **Allegation 1 tracking:** Detailed occurrence log (Date; Method of Transmission; Recipient; Offense type – ACP / Exec. Sess. / other) available in Report body. Board Members A–H recorded as none based on SCOIG analysis of emails provided by the District.

• **Allegation 5 tax notes:** Subject was possibly a resident of another state for a minor portion of the relevant years. Services underlying the payments were performed in South Carolina; apportionment of that income stream to the South Carolina Department of Revenue is proper.

One or more links to SCOIG source material(s) are encrypted to preclude public disclosure.

B. Misconduct in Office and Persistent Neglect of Duty

A school-district trustee who willfully commits or engages in malfeasance, misfeasance, misconduct in office, or persistent neglect of duty is subject to removal by the Governor. As enumerated in the summary of violations chart in Section A, Trustee **Trustee X** violated various District Board policies and state law when **Trustee X**

- Disclosed attorney/client communications and executive session materials to news media outlets on ten occasions and a District vendor on 28 occasions.
- Violated [S.C. Code § 8-13-700\(B\)](#) of the State Ethics Act and Board policy BCB when **Trustee X** sent an email directive to a District principal to meet with **Trustee X** former campaign manager that secured

a multi-hour school visit in a procurement matter. The use of [REDACTED] Board position to influence a governmental decision with an associated individual constitutes misconduct in office and misfeasance.

- Failed to file income tax returns with SCDOR for multiple years as a District vendor and Board member that included the failure to report more than \$248,000 in income in violation of Title 12, Chapter 6 of the S.C. Code of Laws.
- Submitted fraudulent invoices to the District as a vendor.
- Submitted a false statement on a VA mortgage loan application in violation of 18 U.S.C. §1014 and §1001, which also established Trustee [REDACTED] did not live in the District [REDACTED] for a period of time subsequent to [REDACTED] election to the Board.
- Violated Board policy CBI [Evaluation of the Superintendent] when on 5/23/2026, Trustee [REDACTED] stated to the Board chair ... *"I will not be participating in this process..."* in the following District email:

On Sat, May 23, 2026 at 8:06 AM [REDACTED] <[\[REDACTED\]@charleston.k12.sc.us](mailto:[REDACTED]@charleston.k12.sc.us)> wrote:

I will not be participating in this process. I will submit a statement for the record at the appropriate time.



Charleston County School District
75 Calhoun Street
Charleston, SC 29401
[REDACTED]
email: [REDACTED]@charleston.k12.sc.us
www.ccsd.schools.com
twitter.com/ccsdconnects
facebook.com/ccsdconnects
Students are the Heart of Our Work

On Thu, May 21, 2026 at 6:47 AM Pamela McKinney <pamela_mckinney@charleston.k12.sc.us> wrote:

Trustees:

With the 2026-27 Board meeting calendar unanimously approved on Monday, and in alignment with the Superintendent Evaluation Instrument and Evaluation Process unanimously approved by the Board last year, please reserve the following October 2026 dates.

This year's Superintendent Evaluation will review the even-numbered indicators, as agreed upon by the Superintendent and the Board.

October 2 or October 5
Collect Superintendent Evaluation materials from 75 Calhoun or request delivery from Ms. Bowles.

October 8
State of the Schools, Charleston Music Hall, 10:00 AM-noon

October 12
Superintendent Huggins available for evaluation questions, 4:00-5:00 PM prior to COW.

October 14
Evaluations due to 75 Calhoun by 4:30 PM

October 15
Evaluation scores tabulated by the same team: Tempel, McKinney, Roberts, Gilmore, and Thompson.

October 19
Special Called Meeting at 5:15 PM, or earlier if preferred
In Executive Session, trustees will receive evaluation results first, and then, the Superintendent will join to receive and discuss evaluation results with trustees as a body.

October 26
Board of Trustees meeting and public release of results.

Additional procedure reminders and details will be shared later. The purpose of this email is to place these dates on your calendar.

Please DO NOT RESPOND ALL to this email. We are happy to answer any individual emails or phone calls.

Enjoy graduations,
Pam and Carol

The SCOIG notes that Trustee **Trustee X** is SCSBA Board of Directors for: “*Region 2: Charleston.*”¹⁹ Trustee **Trustee X** collateral duty as the Region 2 SCSBA director was funded by District appropriations. This duty to supervise the superintendent was confirmed by longstanding SCSBA guidance and local board policy.²⁰ Trustee **Trustee X** written refusal to participate in the District Board’s formal superintendent evaluation process represented a direct abdication of a core statutory duty.

All of the above factors embodied “*fraud, waste, abuse, mismanagement, misconduct, [and] violations of state or federal law*” per [S.C. Code § 1-6-20\(B\)](#). Accordingly, this provides independent grounds for removal of Trustee **Trustee X** by the Governor under [S.C. Code § 59-19-60](#).

VIII. Way Forward

The SCOIG team observed years of archived District Board meeting videos and attended several Board meetings in person during this investigation. All of which demonstrated countless hours spent on bickering amongst Board members attempting to engage in hyper technical application of Robert’s Rules of Order and arguing about whether Board action(s) were legally sufficient despite perceived subjective defects of parliamentary “order.” While Robert’s Rules of Order may be a helpful guide for conducting orderly meetings, it has no independent legal effect or binding consequences that would invalidate the actions of a majority of duly elected quorum of school board members lawfully operating in open session under applicable state law.

Picayune, intra-Board squabbling accomplishes nothing but greatly distracts from the District’s highest priority – student achievement and preparing the future leaders of our communities. This was no more evident than the dispute over an individual’s failed nomination for the District’s foundation board that caused the District’s expenditure of financial resources in legal representation in court based on a majority Board decision.

Even more important is the District should not be viewed by businesses, non-profit organizations or entrepreneurs as the “pot of gold at the end of the rainbow.” It is disturbing when the District’s procurement process is manipulated to benefit a few self-interests instead of benefiting the District’s goals and its students. The fact that a federal grand jury identified the unlawful disclosure of executive session material by a District Board member to an outside entity regarding a procurement matter underscores the reason that Governor McMaster requested an investigation of the District’s Board.

A Board that is unified, focused on academic achievement and supportive of the superintendent can have its greatest impact on the future success of its students. To do anything else is a disservice to the students, parents and taxpayers of the District.

The SCOIG extends its appreciation to District superintendent Anita Huggins, Board chair Pamela McKinney, District staff, and Board members for their cooperation and intentionality of seeking solutions to the issues identified by the SCOIG. The SCOIG also extends its appreciation to current and former teachers and administrators, and to the parents and constituents in the District for the candor, courage and valuable input provided to the SCOIG during this investigation.

¹⁹ <https://scsba.org/about-us/board-of-directors/>

²⁰ <https://scsba.org/general/roles-and-responsibilities-of-a-school-board-member.pdf>, <https://scsba.org/board-member-roles-and-responsibilities/2025/02/.pdf>, [https://scsba.org/board & superintendent relations-law policy & contract/2023/02/.pdf](https://scsba.org/board-&superintendent-relations-law-policy-&contract/2023/02/.pdf).

APPENDIX A

CIRCLE OF LIFE PROCUREMENT ANALYSIS

APPENDIX A

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APPENDIX A – CIRCLE OF LIFE PROCURMENT ANALYSIS

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APPENDIX A – CIRCLE OF LIFE PROCUREMENT ANALYSIS

A. Good Faith and the Procurement Code

The stated purpose of the South Carolina Consolidated Procurement Code (CPC) is to “*to ensure the fair and equitable treatment of all persons who deal with the procurement system which will promote increased public confidence in the procedures followed in public procurement [and] to provide safeguards for the maintenance of a procurement system of quality and integrity with clearly defined rules for ethical behavior on the part of all persons engaged in the public procurement process...*” [S.C. Code § 11-35-20\(2\)\(f\) and \(g\)](#).¹

S.C. Code § 11-35-30: “*Obligation of good faith. Every contract or duty within this code imposes an obligation of good faith in its negotiation, performance or enforcement. "Good faith" means honesty in fact in the conduct or transaction concerned and the observance of reasonable commercial standards of fair dealing.*”

The official District Request for Proposal (RFP) [P2419](#) listed a bid/submittal due date of 1/25/2024:

South Carolina Business Opportunities
Published by Division of Procurement Services - Delbert H. Singleton, Jr., Division Director
Ad Category: Services
Ad Start Date: January 12, 2024
Title: Student Services for Mentoring, Academic Support and Mental Health Wellness
Purchasing Agent/Entity: Charleston County School District
Bid/Submittal Due Date: January 25, 2024 - 2:00pm
Description: Charleston County School District seek a vendor who will focus on improving and enriching the lives of families in underserved and rural communities by strengthening students' soft skills and quipping them with the tools necessary to be productive citizens in a global society. Partnering with the schools' administration, the organization must be able to help our schools foster an environment of opportunity, respect, and dignity.
Solicitation #: P2419
Direct Inquiries To: Robin McNeal
Buyer Phone#: 843-566-1809
Buyer Email: robin_mcneal@charleston.k12.sc.us
Pre-Bid Information: N/A
Full Details / Download: https://www.ccsdschools.com/Page/432
South Carolina Business Opportunities • SCBO Team • 1333 Main Street, Suite 700 • Columbia, SC 29201 803-737-0600 • scbo@mmo.sc.gov • https://scbo.sc.gov • https://procurement.sc.gov


The relevant published timeline for this RFP was:

¹ The [District Consolidated Procurement Code](#) (District Procurement Code) was “*substantially similar to the provisions of the South Carolina Consolidated Procurement Code and the regulations promulgated thereunder...*” and the SCOIG references herein were to the statutory code for ease of reference. Article 1 § 10(3) of the District Procurement Code.

SCHEDULE OF ACTIVITIES

Event	Date
1. Issuance of Request for Proposal (RFP)	January 12, 2024
2. Non-mandatory Pre-proposal conference	None
3. Deadline for receiving Offeror's questions	January 18, 2024 by 2:00 PM
4. PROPOSAL SUBMISSION DEADLINE Procurement Services 3999 Bridge View Drive North Charleston, SC 29405	January 25, 2024 by 2:00 PM
5. Evaluation Committee Review (estimate)	TBD
6. Selection Complete (estimate)	TBD
7. Intent to Award Posted	By February 15, 2024
8. Contract Award (estimate)	TBD

On 1/25/2024, via "Amendment 1," Solicitation P2419 changed the offer submission date to 1/31/2024 by 2:00PM.

Aaron White, on behalf of Circle of Life submitted multiple proposals – agreeing "*to be bound by the terms of the Solicitation*" with one executed 1/17/2024 and another executed 1/29/2024:

The term "Offer" means your "Proposal".
Offers must be submitted in a sealed package. Solicitation Number & Opening Date must appear on package exterior.

You must submit a signed copy of this form with your offer. By submitting a proposal, You agree to be bound by the terms of the Solicitation. You agree to hold your offer open for a minimum of ninety (90) calendar days after the Opening date.

Print Name of Offeror (Full legal name of business submitting the offer)	Date Signed
Circle of Life Foundation	01/17/24
Authorized Signature (Person signing must be authorized to submit binding offer to enter contract on behalf of Offeror named above.) <i>Aaron White</i>	Taxpayer Identification No.
Title (Business title of person signing above)	92-3200966
Executive Director	Telephone Number
Printed Name (of person signing above)	Facsimile Number
Aaron White	
Company Address (Street, City, State & Zip Code)	
P.O. Box 1366, Johns Island, SC 29457	
Contact Person (if different than authorized signature)	Email Address
	aswhite2@coastal.edu
Telephone Number	Facsimile Number

Cover Page

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You must submit a signed copy of this form with your offer. By submitting a proposal, You agree to be bound by the terms of the Solicitation. You agree to hold your offer open for a minimum of ninety (90) calendar days after the Opening date.

Print Name of Offeror (Full legal name of business submitting the offer)	Date Signed
Circle of Life Foundation	01/29/24
Authorized Signature (Person signing must be authorized to submit binding offer to enter contract on behalf of Offeror named above.) <i>Aaron White</i>	Taxpayer Identification No.
Title (Business title of person signing above)	92-3200966
Executive Director	Telephone Number
Printed Name (of person signing above)	Facsimile Number
Aaron White	
Company Address (Street, City, State & Zip Code)	
P.O. Box 1366, Johns Island, SC 29457	
Contact Person (if different than authorized signature)	Email Address
	aswhite2@coastal.edu
Telephone Number	Facsimile Number

Cover Page

Multiple versions of the Total Estimated Program Costs were observed by the SCOIG within the District's procurement records:

OVERHEAD COST		Price
Technology cost		Included
Supplies (Training materials, Psychoeducational group materials and curriculum, etc.)		Included
Administration/Program Operation		Included
COST OF PROGRAMMING		
Tier I. Community Mentorship	\$40,500 Cost per pupil: \$1,350 x30 pupils	
Tier II. Wraparound Services	\$36,000 Rate: \$120/hr. individual (estimated 4 hrs. per pupil/month)	
Tier III. Mental Health Support and Psychoeducational Wellness Groups	\$79,200 Rates: Group Sessions- \$1,200/hr. Individual- \$120/hr.	
Includes one-time coordination of care services for additional 10-15 students, increasing overall served to maximum of 45 students.	\$0	
Total Estimated Program Costs		\$155,700

Submitted by: Aaron S. White, MSW, LISW-CP, (Executive Director, Circle of Life Foundation)
Signature: Aaron White Date: 1/17/24

OVERHEAD COST		Price
Technology cost		Included
Supplies (Training materials, Psychoeducational group materials and curriculum, etc.)		Included
Administration/Program Operation		Included
COST OF PROGRAMMING		
Student Service for Mentoring, Academic Support and Mental Health Wellness	Overall Hourly Rate: \$216 per pupil/hr.	
Includes one-time coordination of care services for additional 10-15 students, increasing overall served to a maximum of 45 students.	\$0	
Total Estimated Program Cost		\$155,700

Submitted by: Aaron S. White, MSW, LISW-CP, (Executive Director, Circle of Life Foundation)
Signature: Aaron White Date: 2/7/24
Revised Cost Proposal

Page 7 of the RFP required that: ***“No company should contact District staff directly. ... Answers to any questions submitted will be sent to all companies via solicitation amendment.”*** The Intent to Award was posted by the District on 2/16/2024:

Solicitation:	P2419
Issue Date:	January 12, 2024
Opening Date:	January 31, 2024
Description:	Student Services for Mentoring, Academic Support and Mental Health Wellness
Awarded To:	Circle of Life Foundation PO Box 1366 Johns Island, SC 29457
Awarded Amount:	\$216 Per Pupil Per Hour Rate
Contract Period:	February 27, 2024 through June 30, 2024

The SCOIG observed District visitation records indicated that executive director Aaron White, one of the three (3) offerors, visited the *“Main Office”* of a District school for several hours on 1/26/2024:

01/26/24 9:23 AM	01/26/24 12:01 PM	St. Johns High School	Main Office	 
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The SCOIG observed email records related to Aaron White with a subject line of “*School Visit for Circle of Life*” dated 1/19/2024 through 1/25/2024 – indicating that the officers of Circle of Life would be visiting the school:

From: Aaron White
Sent: Friday, January 19, 2024 1:46:31 AM
To: [REDACTED]@charleston.k12.sc.us>
Cc: Ewhite703@gmail.com <Ewhite703@gmail.com>
Subject: School Visit for Circle of Life

Good morning Mr. [REDACTED]

Good seeing you yesterday at the SIC meeting. Unfortunately, I was unable to speak with you afterwards as was my intent because I had to pick up [REDACTED]. Per your request and our desire, we wanted to schedule some time to visit the school, be observers, and spend some time in the building during the school day. You mentioned this would be ideal prior to programming. We are looking at next Friday, January 26 if that works for you. Please let me know if a visit that day is feasible.

To provide you with an update, we are still waiting finalization from a procurement and contractual perspective. Things are moving along, nonetheless. Projected start date would be the first part of February for programming. Our hope is to start work with a strong cohort at that time continuing through mid-summer (end of June) providing these services in the community even while students are out on summer break.

Please let me know if next Friday works for you, we're looking forward to it!

Regards,
Aaron White

The 1/26/2024 visit occurred one day after the District’s “Amendment 1” to the solicitation P2419 on 1/25/2024. This amendment changed the offer submission deadline date to 1/31/2024. Aaron White submitted a proposal to the District on behalf of Circle of Life – dated 1/29/2024 (following the original Circle of Life offer/proposal dated 1/17/2024).

The SCOIG identified this “*visit*” by an offeror during the RFP process to be a direct violation of the [District Procurement Code](#), particularly when other vendors were not afforded the same opportunity. Additionally, the offer/proposal dated 1/29/2024 submitted by Aaron White on behalf of Circle of Life occurred after he sought and received an unfair advantage compared to other offerors - the express purpose of the 1/26/2024 “*visit*” to the school as described in the above email.

The SCOIG observed another email sent by Aaron White with the subject line: “*Update on Circle of Life proposal*” dated 1/31/2024 at 11:06AM. This occurred hours prior to the offer deadline of “*January 31, 2024, by 2:00PM.*”

Re: Update on Circle of Life proposal

aswhite2@coastal.edu Aaron White Friday, February 2, 2024 at 11:41:01 AM Eastern Standard Time
To: [REDACTED]@charleston.k12.sc.us [REDACTED]
Cc: [REDACTED], johne_cobb@charleston.k12.sc.us COBB, JOHNE

Thank you Ms. [REDACTED] You as well.

Regards,

Aaron White

From: [REDACTED]@charleston.k12.sc.us>

Sent: Friday, February 2, 2024 8:59:47 AM

To: Aaron White <aswhite2@coastal.edu>

Cc: [REDACTED]@charleston.k12.sc.us>; COBB, JOHNE <johne_cobb@charleston.k12.sc.us>

Subject: Re: Update on Circle of Life proposal

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning, Mr. White! Thank you so much for the information and update. Have the best weekend!

[REDACTED]



[REDACTED]
Interim Chief Academic Officer
Charleston County School District
75 Calhoun Street
Charleston, SC 29401
843-937-6415
843-937-6592
Students are the Heart of Our Work.

On Wed, Jan 31, 2024 at 11:06 AM Aaron White <aswhite2@coastal.edu> wrote:
Good morning all,

Hope all is well with each of you. Just find it necessary to providing an update on the Circle of Life proposal which we've continued to collaborate on for some months now. Just wanted to provide you with an update regarding our continued efforts. We have continued to meet with D9 principal [REDACTED] throughout this process as recent as this past week and are now positioned to begin providing services when permitted. We spent the day just this past Friday meeting with Mr. [REDACTED] again, along with Admin, staff, and students. Everyone expressed how beneficial this will be to students and families. We too are excited about this!

As you know, the original proposal was established for D9, however, a solicitation was put out in a broader sense as an RFP by Procurement to satisfy the necessary federal requirements. It is our belief that this proposed methodology can be generalized to any feeder pattern of similar need. We have responded to the RFP last week with the point of contact in the Procurement Office and submitted acknowledgement of amendment earlier this week. The solicitation is projected to end today at 2pm. We remain committed to serving students and families throughout CCSD wherever there is a need. As such, we will hopefully wait to hear from the District regarding next steps.

Lastly, THANK YOU ALL so much for working through this process with us over the past few months. We've had a few hurdles during this process with a bit of a hiatus during the time teacher pay increases were being worked out, and with the new Federal requirements. Things got delayed but you all remained responsive and diligent in this effort. That does not go unnoticed. Please let me know if there are any questions! Have a wonderful day!

Regards,

Aaron White

This represented a direct violation of the terms of the RFP process that the offeror submitted:

NOTICES All contact should be directed to Robin McNeal, CPPO, CPPB, Procurement Officer. No company should contact District staff directly. All questions should be directed in writing to Robin McNeal via Email robin_mcneal@charleston.k12.sc.us. Answers to any questions submitted will be sent to all companies via solicitation amendment.

Specifically, the stated purpose of the visit (“some time to visit the school, be observers, and spend some time in the building during the school day”) was to obtain and/or influence information directly relevant to most of the scoring factors for the RFP process (items 1 and 2, totaling 70/100 points):

	EVALUATION FACTORS / CRITERIA FOR EVALUATION	POINTS
1.	Describes methodology for supporting college and career readiness skills including curriculum if appropriate	35 Points
2.	Describes methodology for supporting students' mental health and wellness in order to reduce disciplinary referrals including curriculum if appropriate	35 Points
3.	Describes plan for the hiring and supervision of staff members who will work with students	20 Points
4.	Total Cost of Proposal	10 Points
5.	TOTAL POSSIBLE POINTS	100 Points

*Note: "Cost of Proposal" must be submitted in a separate, sealed envelope marked "Cost of Proposal"

The RFP encouraged participation by Small, Women, and Minority Owned Business Enterprises (SWMBE), stating, "Charleston County School District encourages SWMBE businesses to participate in the solicitation process."² Under [S.C. Code § 11-5-1520\(9\)\(c\)](#), SWMBE status is used as a preference when a tie occurs between bids. However, in the evaluation of this RFP, Circle of Life's minority-owned status was specifically identified as a strength of the proposal submitted by the winning bidder, as reflected in the scoring documentation below:

Circle of Life Foundation			
EVALUATION FACTORS / CRITERIA FOR EVALUATION	POINTS	Score 0 - 100	Total
Describes methodology for supporting college and career readiness skills including curriculum if appropriate	35 Points	75	26.25
Describes methodology for supporting students' mental health and wellness in order to reduce disciplinary referrals including curriculum if appropriate	35 Points	95	33.25
Describes plan for the hiring and supervision of staff members who will work with students	20 Points	93	18.6
Total Cost of Proposal	10 Points	60	6
TOTAL POSSIBLE POINTS	100 Points		84.1
Notes: Please provide an explanation / your opinion if any total score is below 70			
Strengths: Local and African American owned business, lots of data and research specific to CCSD included, target population of middle and high			

When an offeror elects to submit an offer/proposal in response to an RFP, that submission becomes a "form" required by the laws of this State through the operation of S.C. Code 11-35-5340. Any misleading or false information provided in the offer/proposal subjects the offeror to perjury as a potential consequence. As "[i]t is unlawful for a person to willfully give false, misleading, or incomplete information on a document, record, report, or form required by the laws of this State."

B. District Vendor Seeking Testimonial from a District Employee

In the supporting documentation submitted by Circle of Life were several letters in support of the proposal. One letter was solicited by Aaron White from a District employee using District resources:

² Solicitation [P2419](#) (p. 14)

PO Box 1832
John's Island, SC 29457

REACH Family Worship Center
Apostle, Rev. Gertie S. Ford, MS

Tel: [REDACTED]
Email: [REDACTED]@gmail.com

Sent: 5/1/2023 6:11:21 PM
From: Aaron White <aswhite2@coastal.edu>
To: [REDACTED]@charleston.k12.sc.us
Cc: [REDACTED]@gmail.com
Bcc:
Importance: Normal
Subject: Proposal Letter of Support
Attachments: [Letter of Support.docx](#)

Good evening [REDACTED]
Thanks again for talking with me earlier regarding the proposed program at St. Johns. Wasn't sure which email address you use most frequently but as promised, attached is a mark-up of some basics for your letter of support. Please feel free to add or take away as necessary. If you could send back as soon as possible, that would be great and I can add your support to the proposal.
Thanks again and looking forward to hearing from you soon. God bless!
Regards,
Aaron S. White

To Whom it May Concern:

I am writing in support of the "Circle of Life Program" proposal to be established at St. John's High School. As a Sr. Pastor and Community member, I believe that this program will provide the necessary tools to help students and families thrive. Personally, I have expertise in Family Counseling, Mental Health Counseling, Crisis Intervention Stress Management and Debriefing, Trauma, and Restorative Practices. I currently serve as an elected official and Board Chair with the St. Johns District 9 Constituent School Board, a member of the John's Island Council, a First Responder Crisis Chaplain, a Restorative Practitioner with CCSD, and as an Elementary Education Teacher on a master's degree level with some Doctoral studies.

Having read and familiarized myself with the components of the "Circle of Life Program," I am led to believe that the program will be an effective tool and additional resource for our students, schools, and the entire constituency surrounding St. John's High School. In the hopes of accomplishing the goal of increased academic achievement and graduation rate, a reduction of mental health crises, and to decrease and deter disciplinary incidents through preventative interventions and strategies. The proposed structure of the program will include mentorship, mental health, and wrap-around services to improve student achievements academically, mentally, and emotionally.

The program has and will establish community partnerships with civic and non-profit organizations as well as other community agencies to provide support for families that will greatly benefit the St. John's High School community at large. Therefore, it gives me great pleasure to recommend and support the implementation of the "Circle of Life Program" in our D9 High School.

Regards,

Apostle, Rev. Gertie Smalls-Ford, MS

Apostle, Rev. Gertie Smalls-Ford, MS
Presiding Prelate and Senior Pastor
Post Office Box 1832
Reach Family Worship Center
John's Island, SC 29457

The use of District resources to endorse a vendor and for that vendor to utilize the District employee testimonial in official responsive submissions during the RFP process was improper. See generally, S.C. Code § 11-35-20(2)(b), (f), (g); § 11-35-30.

C. Comparison of \$23.78 per person/hr versus "\$216 per pupil/hr"

The performance report submitted to the District by Circle of Life included a breakdown of the costs for invoices #001, #002, #003, #004, #005, #006, and #007 (totaling \$47,520 paid by the District, e.g. \$881.30+\$45,357+\$1,281.70):

FY24 Activity Expense Report- 07/01/2023 to 06/30/2024

Expense Item	Cost
Overhead, Technology, Administration/Program Operation	\$881.30
Direct student services: Programming, materials/curriculum, staffing at CCSD contracted rate. Costing approx. \$2,376/pupil (St. Johns High School) Mental Health and Wellness (Psychoeducation groups, Individual/Group Counseling) Mentorship Wraparound Services	\$45,357.00
Total	\$46,238.30 -\$1,281.70

The SCOIG observed several line items totaling \$4,104 on invoices #002 and #005 that did not correspond to any records of school visits per the available entries for Aaron White on the District's Raptor system:

Date of services: 04/04/2024 Family Contact over Spring Break for: Student Services for Mentoring, Academic Support, and Mental Health Wellness	7	\$216 per pupil/hr.	\$1512.00
Date of services: 04/05/2024 Family Contact over Spring Break for: Student Services for Mentoring, Academic Support, and Mental Health Wellness	5	\$216 per pupil/hr.	\$1080.00
Date of services: 05/13/2024 Student Services for Mentoring, Academic Support, and Mental Health Wellness Family Contact (3)	7	\$216 per pupil/hr.	\$1512.00

For the SCOIG analysis of the District's Raptor visitor log records for Aaron White, an initial random date was selected from the dates on the visitor logs, i.e. 03/25/2024:

03/25/24 9:50 AM	03/25/24 5:00 PM	St. Johns High School	Classroom	 
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Per the [Raptor system User Guide](#), p. 55: “By default, Raptor is configured to automatically sign out all visitors 5:00 PM.” As such, whenever the visitor sign out time was precisely “5:00 PM” it was likely because the visitor failed to properly sign out when they left. Accordingly, the SCOIG selected a different date from the Raptor visitor log for Aaron White that did not indicate a sign out time of precisely “5:00 PM”, i.e. 5/6/2024:

05/06/24 9:52 AM	05/06/24 1:40 PM	St. Johns High School	Main Office
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For 5/6/2024, the invoice (#005) reflected the following line item:

DESCRIPTION	QTY/STUDENTS	RATE/HR.	AMOUNT
Date of services: 05/06/2024 Student Services for Mentoring, Academic Support, and Mental Health Wellness	9	\$216 per pupil/hr.	\$1944.00

The 5/6/2024 visitor log reflected 3.8 hours [9:52 AM → 1:40 PM = 3 hours 48 minutes] of presence in the school on 5/6/2024, whereas invoice #005 reflects “9” as the quantity at “\$216 per pupil/hr” totaling \$1,944.00. Accordingly, “9” did not correspond to hours compared to the visitor log records for Aaron White. Thus, the SCOIG was unable to reconcile the “hr” portion of the billing description of “\$216 per pupil/hr” based solely on the invoice(s).

For comparison, using the “[Group psychotherapy](#)” represented by billing code 90853 on the South Carolina Department of Health and Human Services (SCDHHS) [Licensed Independent Practitioner Fee Schedule](#) at \$23.78 per hour per person as a benchmark; for 9 students serviced by a counselor for 3.8 hours, at \$23.78 per hour per person is \$813.28. The invoiced amount of \$1,944, a difference of \$1,130.72 - represented a 139.03% increase compared to the SCDHHS listed rate.

D. Background Checks of All Vendor Employees Coming in Contact with Students

According to “Tab B” of the District Procurement Services Request documentation the following was specifically listed as required documentation from offerors:

Required Documentation from Offerors

-Professional Certificate

-background checks of all employees coming in contact with students.

-Evidence of successful implementation within the past 5 years.

See also, RFP [P2419](#) (page 17) for background check requirements.

The response to the RFP submitted by Aaron White on behalf of Circle of Life lacked the required documentation of “*background checks of all [vendor] employees coming in contact with students.*”³ Accordingly, the offer was technically non-compliant and should have been rejected.⁴

Based on interviews with senior District officials and a review of documents provided by the District, the SCOIG review found no evidence that the District executed a formal contract with Circle of Life, obtained parental consent forms or provided notification to parents of participating students, or conducted background checks on Aaron White and Eugene White.

The RFP required “[t]he Contractor shall provide General Liability and other Insurance as listed herein.” RFP, page 11. There was no insurance documentation provided by one or more offerors, their submissions should have been deemed non-compliant and rejected.

E. “Spreadsheet With Notes”

The SCOIG reviewed District email records and observed several instances of a public facing google drive link that contained the full name as well as grade levels, etc., for the Circle of Life participants [District students], e.g., “*FINAL Spring 2024 Mentoring List (for Staff)*.”⁵ The SCOIG review of these email discussions determined at no point did any of the licensed professionals – including the highly paid alleged expert - raise any concerns about placing this sensitive information on a publicly available internet link.⁶

The SCOIG observed an active, publicly available Google Drive link: “*FINAL SJHS Spring 2024 Mentoring List*” that contained several tabs [aka sheets] within the spreadsheet with rows containing the full names of students, schedules, parent contact information and a column labeled “*Notes from Nominator.*” This contained highly sensitive information regarding each student; one generic example was: “*Academic and behavior concerns. Grandmother is concerned as well. Recent family death. -- Family trauma, behavioral concerns.*”^{7/8}

³ See generally [S.C. Code § 59-19-117\(B\)](#).

⁴ The other categories of required documentation were similarly non-existent, e.g., “evidence of successful implantation within the past 5 years” as the Circle of Life Foundation was officially registered with the SC Secretary of State on [3/29/2023](#).

⁵ The SCOIG appreciated the District’s prompt attention to the situation once advised of it by the SCOIG – the links were deactivated.

⁶ [U.S. Code of Regulations 34 CFR § 99.31\(a\)\(1\)\(ii\)](#) states: “An educational agency or institution must use reasonable methods to ensure that school officials obtain access to only those education records in which they have legitimate educational interests. An educational agency or institution that does not use physical or technological access controls must ensure that its administrative policy for controlling access to education records is effective...”

⁷ https://docs.google.com/spreadsheets/d/1t0odA9e30zq8YvNabYu***** [redacted by SCOIG].

⁸ https://docs.google.com/spreadsheets/d/1B51kzXSk7u5Jk6mvtvcmy6E-NHhKF94TcgOC***** [redacted by SCOIG].

From: [REDACTED]@charleston.k12.sc.us>
Sent: Tuesday, March 5, 2024 7:53:51 AM
To: Aaron White <aswhite2@coastal.edu>
Cc: Ewhite703@gmail.com <Ewhite703@gmail.com>
Subject: Re: Mentorship/Psychoeducation Follow-up

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Ok, I am linking the spreadsheet below.
I decided to leave my notes out for now until you both look over the list. I can give notes once you have a chance to review.
[https://docs.google.com/spreadsheets/d/1t0odA9e30z6\[REDACTED\]](https://docs.google.com/spreadsheets/d/1t0odA9e30z6[REDACTED])
[REDACTED]

On Mon, Mar 4, 2024 at 2:29 PM Aaron White <aswhite2@coastal.edu> wrote:
Awesome! Thank you so much [REDACTED]. Yes, if you could put into a spreadsheet with notes, that would be most helpful! We'll review and connect if we have questions. Once we review, I can circle back with you and maybe we can set up a Zoom call or conference call to discuss any questions that may arise.
Regards,
Aaron White
From: [REDACTED]@charleston.k12.sc.us>
Sent: Monday, March 4, 2024 2:22 PM
To: Aaron White <aswhite2@coastal.edu>
Cc: Ewhite703@gmail.com <Ewhite703@gmail.com>
Subject: Re: Mentorship/Psychoeducation Follow-up

The SCOIG was aware of the District use of Google as an IT infrastructure provider, and normally robust security was in place by default. However, to make the link visible to the vendor (who specifically requested “a spreadsheet with notes”), a public link was necessary to accommodate the vendor that was not within the District ecosystem.

A senior District official involved in this process informed the SCOIG that they felt compelled to use this vendor because of the pressure applied by the District Board member who directed the initial interaction between the school and the vendor. It was this direction by the District Board member that permitted the vendor to gain access and eventually circumvent the statutory procurement process.

The SCOIG reviewed certain District email records showing that this vendor received open access to sensitive student data:

- email dated “2/22/2024 @ 8:33:38 AM From: Aaron White <aswhite2@coastal.edu To: kaytie_widener@charleston.k12.sc.us ... Subject: Re: Counseling Dept. Collaboration.”
- another internal District email dated 2/29/2024 stated: “Yes, any grade level, gender, demographic as far as I know so far. I would submit any students that you can think of and I will let the facilitators narrow the list down as needed.”

The SCOIG concluded that the tab with parental contact information made per the vendor’s request created a high risk of exploitation in that it could be used by the vendor to directly solicit services from the parents. A person/entity could utilize the information for blackmail/extortion.

F. Invoiced Payments

The SCOIG observed ten (10) invoices (#001 - #010) submitted by Aaron White to the District. Invoices #008 and #009 were not paid by the District and invoice #010 was submitted for new services rendered, and adjustments from alleged services originally claimed on invoices #008 and #009. The amount invoiced and paid (excluding unpaid invoices #008 and #009) totaled \$64,584.00. At a billing rate of \$216 “per pupil/hr”, the charges equate to 299 pupil hours of social work services allegedly rendered at District schools on District students.

For comparison, the SCOIG reviewed the available [SCDHHS Licensed Independent Practitioner Fee Schedule](#). The average master's level reimbursement (“HO”) rate was approximately \$91.29. An hourly rate of \$216 represented a significant departure from \$91.29, particularly from a “non-profit” type foundation when providing services to children from low-income families. However, SCOIG was informed, and the invoices confirmed, that these were alleged group type counseling services billed at \$216 “per pupil/hr” with up to 19 students per group session.⁹ Invoice #001 is shown below as an example:



Unauthorized
✓ 54611

Circle of Life Foundation

Aaron S. White, MSW, LISW-CP, Executive Director
P.O. Box 1366,
Johns Island, SC 29457
Phone: [REDACTED]
Email: aswhite2@coastal.edu

INVOICE

INVOICE #: 001
CCSD VENDOR #: 54611
Invoice Date: 03/25/2024

TO:
Charleston County School District
ATTN: Jennifer Young
St. Johns High School
1518 Main Rd.
Johns Island, SC 29455

FOR:
Contract: P2419 Student Services for Mentoring,
Academic Support, and Mental Health Wellness

95/218/49-399-09101

DESCRIPTION	QUANTITY	RATE	AMOUNT
Date of services: 03/11/2024 Student Services for Mentoring, Academic Support, and Mental Health Wellness	12	\$216 per pupil/hr.	\$2592.00
Date of services: 03/14/2024 Student Services for Mentoring, Academic Support, and Mental Health Wellness	4	\$216 per pupil/hr.	\$864.00
Date of services: 03/18/2024 Student Services for Mentoring, Academic Support, and Mental Health Wellness	12	\$216 per pupil/hr.	\$2592.00
Date of services: 03/21/2024 Student Services for Mentoring, Academic Support, and Mental Health Wellness	12	\$216 per pupil/hr.	\$2592.00
TOTAL			\$8,640.00

TERMS AND CONDITIONS:
Total due upon receipt. Please make all direct deposits payable to Circle of Life Foundation. A late fee of 10% will be charged for payments not received prior to 30 days after invoice date.

THANK YOU FOR YOUR BUSINESS!

For comparison, “[Group psychotherapy](#)” represented by billing code 90853 on the [SCDHHS Licensed Independent Practitioner Fee Schedule](#) is \$23.78 per hour per person. The billed hourly rate of \$216 “per pupil/hr” reflects an 808.32% increase over the expected rate of \$23.78, equivalent to approximately 9.08 times the original amount.¹⁰

This wraparound counselor conducted group sessions with students on school grounds and billed the District at an hourly rate per participating student, resulting in multiplied charges (e.g., 10x for a group of 10) for the same session time. While per-participant billing aligns with some clinical and Medicaid practices for documented individual services in groups, this arrangement requires robust contract specifications, per-student documentation of necessity and progress, and oversight to prevent potential waste or inflated costs to public funds.

⁹ Invoice #010 had a line item for \$4,104 for \$216 per hour for 19 students at St. John’s High School on 10/25/2024.

¹⁰ This vendor also claimed to be entitled to an additional “late fee of 10% will be charged for payments not received prior to 30 days after invoice date.”

G. District Student Photos and Student Client Testimonials - Exploitation

The SCOIG observed emails between the District and Circle of Life discussing procurement/contract issues. Eventually, Circle of Life submitted a document labeled “*Circle of Life CCSD FY24 Performance Report.pdf*” via email dated 3/5/2026. The 15-page PDF explained, in part, the “*Target Population*” and the “*Needs Assessment*”:

<u>Target Population (Selection of Cohort)</u>	<u>Needs Assessment/Evaluation</u>
<p>Locations and dates of service provision:</p> <p>St. Johns High School: Mar- Jun. 2024, and Oct-Nov. 2024 (ESSER sunset/services terminated)</p> <p>Haut Gap Middle School: Oct-Nov. 2024 (ESSER sunset/services terminated)</p> <ul style="list-style-type: none">Students were identified by teachers and staff members and referred to the program after solicitation by Guidance Departments at both schools for student participation in the Circle of Life Program.34 unique student nominations were received at St. Johns High School and 10 unique nominations were received at Haut Gap Middle School.Circle of Life Program per contractual parameters would serve 20 of these student nominees in the program at St. Johns High School and 10 student nominations at Haut Gap Middle School on an ongoing basis.	<p>Criteria used to select 30 students (20 at St. Johns, 10 at Haut Gap Middle):</p> <p>Criterion 1: Students who were referred by more than one staff member. (Rationale: Chronically identifiable concerns)</p> <p>Criterion 2: Students with academic and/or behavioral concerns. (Rationale: Concerns that would lead to retention, dropout, and absenteeism.)</p> <ul style="list-style-type: none">Based on the above criteria, the Circle of Life team and St. Johns High School guidance department and Haut Gap Middle School guidance department reviewed individual students needs and information provided by staff members.Once assessment of need was completed, the 20 students were selected at St. Johns High School and 10 selected at Haut Gap Middle School and were identified as needing any number of the specific tiers of the program: Mentorship, Wraparound Services, Mental Health and Wellness.

Circle of Life took numerous photographs of students during these sessions and incorporated them into the performance report without documented Family Educational Rights and Privacy Act (FERPA) releases or evidence of compliance with disclosure exceptions (e.g., school official/contractor provisions under a qualifying written agreement). Student images in a counseling context likely constitute education records when maintained or shared with the District, raising compliance risks under FERPA regarding consent, authorized use, and protection of sensitive personally identifiable information.

The performance report also included multiple handwritten testimonial messages from the students themselves (“*Program impact in their own words...*”). This practice appears to involve solicitation from clients in a school setting - creating a captive audience with inherent power imbalances - and professional ethical standards. See:

- National Association of Social Workers [Code of Ethics: Ethical Standards 407\(b\)](#): “*Social workers should not engage in solicitation of testimonial endorsements (including solicitation of consent to use a client’s prior statement as a testimonial endorsement) from current clients or from other people who, because of their particular circumstances, are vulnerable to undue influence.*”
- American Counseling Association [2014 Code of Ethics – Professional Responsibility Section C.3.b.](#)), which prohibit soliciting testimonials from vulnerable current or former clients due to risks of undue influence and exploitation.
- [S.C. Code of Regs § 110-20\(5\)](#): “*A social worker shall not exploit his professional relationships with clients (or former clients), supervisor, students, employees, or research participants, sexually or otherwise.*”

Collectively, these practices highlight potential gaps in vendor contract terms, documentation, privacy safeguards, and ethical oversight for services involving vulnerable students. Such issues could expose the District to compliance violations, reputational harm, licensing concerns for the provider, and inefficient use of resources. Further review of contracts, records, and related policies by the District was warranted. The District informed the SCOIG that it had no records of any background check(s) being conducted for the individual(s) associated with this vendor that met with District students on District properties during District school hours.¹¹

¹¹ S.C. Code § 59-19-117.

District personnel informed the SCOIG (and the photos in the performance report confirm) that this vendor met with students without any presence whatsoever of District staff.

H. Inure to the Benefit of Any Private Shareholder or Individual

According to the vendor application submitted to the District, the president and vice-president of Circle of Life were “Aaron White” and “Eugene White” respectively:

TYPE OF ORGANIZATION: INDIVIDUAL _____ CORPORATION _____ NON-PROFIT <u>X</u> (PROVIDE APPROPRIATE DOCUMENTATION) IF CORPORATION INDICATE WHICH STATE _____	
NAME OF OFFICER(S), OWNER(S) OR PARTNER(S) AND CONTACT(S) IN YOUR ORGANIZATION: (A) PRESIDENT Aaron White (B) VICE PRESIDENT Eugene White (C) SECRETARY _____ (D) TREASURER _____ (E) OWNER/PARTNER _____	
PRODUCTS ARE SOLD: _____ DELIVERED _____ FOB _____ (IF SO FOB POINT) INVOICE TERMS (min. net 30) _____ NET WORTH: _____ AVERAGE NUMBER OF EMPLOYEES: _____	
PERSON AUTHORIZED TO SIGN BIDS, OFFERS, QUOTES AND CONTRACTS: NAME: Aaron White OFFICIAL CAPACITY Executive Director TEL. NO. 843-364-6829	

According to one or more of the student testimonials contained in the performance report, the services were rendered by “Aaron and Eugene” who were the sole officers of the Circle of Life; District management and the Board should evaluate these arrangements to confirm that all payments represented reasonable compensation for actual services rendered and were supported by appropriate governance and documentation. A detailed analysis of the Circle of Life’s financials and potential inurement concerns was beyond the scope of SCOIG’s investigation.

The SCOIG identified a high risk that services provided by a Circle of Life member may have created an impermissible inurement of the organization’s earnings, contrary to 501(c)(3) standards.¹²

The SCOIG reviewed publicly available tax documents for Circle of Life on via the Internal Revenue Service (IRS) website. The [2024 990-PF for Circle of Life Foundation](#) contained the following information regarding revenue [“contributions”] received for calendar year 2024:

Part I Analysis of Revenue and Expenses <small>(The total of amounts in columns (b), (c), and (d) may not necessarily equal the amounts in column (a) (see instructions).)</small>		(a) Revenue and expenses per books	(b) Net investment income	(c) Adjusted net income	(d) Disbursements for charitable purposes (cash basis only)
1	Contributions, gifts, grants, etc., received (attach schedule)	57,520			

The \$57,520 was broken down on the schedule as follows:

¹² As the IRS [explains](#): “A section 501(c)(3) organization must not be organized or operated for the benefit of private interests, such as the creator or the creator’s family, shareholders of the organization, other designated individuals, or persons controlled directly or indirectly by such private interests. No part of the net earnings of a section 501(c)(3) organization may inure to the benefit of any private shareholder or individual. A private shareholder or individual is a person having a personal and private interest in the activities of the organization.”

Name of organization Circle of Life Foundation		Employer identification number 92-3200966	
Part I Contributors (see instructions). Use duplicate copies of Part I if additional space is needed.			
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
1	Charleston County School District 75 Calhoun St Charleston, SC 29401	\$ 47,520	☐ Person ☒ Payroll ☐ Noncash <small>(Complete Part II for noncash contributions.)</small>
2	Kiawah Cares Foundation 23 Beachwalker Drive Kiawah Island, SC 29455	\$ 10,000	☐ Person ☒ Payroll ☐ Noncash <small>(Complete Part II for noncash contributions.)</small>

The Circle of Life was paid \$47,520 by the District via invoices #001 - #007 which was not consistent with a “payroll” type of contribution.¹³ Listing it as such falsely implies that District employees elected to contribute to the Circle of Life via payroll deduction(s), whereas the \$47,520 was for invoiced services.

The SCOIG reviewed the publicly available [2024 990 for Kiawah Cares Foundation](#) and confirmed that \$10,000 was listed as a cash type grant to Circle of Life Foundation:

Form 990, Schedule I, Part II, Grants and Other Assistance to Domestic Organizations and Domestic Governments.							
(a) Name and address of organization or government	(b) EIN	(c) IRC section if applicable	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of non-cash assistance	(h) Purpose of grant or assistance
Circle Of Life Program 226 Pink Azalea St Summerville, SC 29485			10,000				Program Sponsorship and Support
St Johns High School 1518 Main Rd Johns Island, SC 29455			14,725				Program Sponsorship and Support

However, the contribution from Kiawah Cares Foundation to Circle of Life Foundation is referenced as “Program Sponsorship and Support”, there was nothing to reflect a “Payroll” type contribution.

Expenses were listed as \$55,357 and described below:

Part VIII-A Summary of Direct Charitable Activities	
List the foundation's four largest direct charitable activities during the tax year. Include relevant statistical information such as the number of organizations and other beneficiaries served, conferences convened, research papers produced, etc.	Expenses
1 Educational Support to include mentorship and mental health and wellness in schools. Educational Support Services provided to multiple schools 2 during the tax year. 300+ per pupil hours of support provided to students and families.	55,357
2	

According to the “Performance Report” submitted by Circle of Life, the following claim was made regarding 2024 activity: “Circle of Life donated \$1,000 to the family of [a student] to assist with ... expenses.” The Circle of Life’s claim that it donated \$1,000 to a student’s family for expenses in 2024 is suspect because no grants to individuals appear in Part XIV of its 2024 Form 990-PF, the schedule on which private foundations are required to report all grants and contributions paid during the tax year.¹⁴

¹³ The IRS [Instructions for Schedule B \(Form 990\) \(12/2024\)](#) stated: “If an employee’s cash contribution was forwarded by an employer (indirect contribution), check the “Payroll” box.”

¹⁴ There existed a similarly named entity: “Circle of Life Therapy and Consulting, LLC” with Aaron White as the Registered Agent - per [SCSOS records](#). However, this LLC version of “Circle of Life” did not exist until 10/2/2025 and could not have made said donation.

The SCOIG also reviewed the tax documents for the Circle of Life for 2025 which contained the following information regarding revenue [“contributions”] received for calendar year 2025:

Schedule B (Form 990) (2025)		Page 2	
Name of the organization Circle of Life Foundation		Employer identification number 92-3200966	
Part I Contributors (see instructions). Use duplicate copies of Part I if additional space is needed			
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(c) Type of contribution
1	Charleston County School District 75 Calhoun St, Charleston, SC 29401	\$ 17,064	Person ☐ Payroll ☒ Noncash ☐ (Complete Part II for noncash contributions.)

The amount listed was paid to the Circle of Life by the District via invoice #010 dated 11/14/2024 for services provided on 10/11/2024 and 10/25/2024. Listing it as a “Payroll” type of contribution falsely implies that District employees elected to contribute to the Circle of Life via payroll deduction(s), whereas the \$17,064 was for invoiced services.