

# EXHIBIT 1

**STATE OF SOUTH CAROLINA  
ADMINISTRATIVE LAW COURT**

South Carolina Department of Revenue, )  
 )  
 Petitioner, )  
 )  
 vs. )  
 )  
 Study Hall, LLC, d/b/a Study Hall, LLC, )  
 )  
 Respondent. )  
\_\_\_\_\_ )

Docket No. 19-ALJ-17-0269-CC

**FINAL ORDER RECEIVED**

**MAR 10 2020**

**SC Court of Appeals**

This matter is before the South Carolina Administrative Law Court (ALC or Court) on a request by Study Hall, LLC, d/b/a Study Hall, LLC. (Respondent) for a contested case hearing challenging the cancellation of its on-premises beer and wine permit and its restaurant liquor by the drink license by the South Carolina Department of Revenue (Petitioner or Department).

A hearing in this matter was held on December 17, 2019, at the ALC in Columbia, South Carolina. After careful consideration of the evidence presented, as well as the applicable law, the court finds that Respondent's owner is of good moral character and that the on-premises beer and wine permit and the restaurant liquor by the drink license should be reissued subject to the conditions set forth herein.

**FINDINGS OF FACT**

Having observed the witnesses and exhibits presented at the hearing and passed upon their credibility, taking into consideration the parties' respective burdens of proof, the Court makes the following Findings of Fact by a preponderance of the evidence.

Respondent had an on-premises beer and wine permit and a restaurant liquor by the drink license that expired on November 30, 2018. On December 7, 2018, Respondent applied for renewal of its on-premises beer and wine permit and its restaurant liquor by the drink license for the location at 101 Sloan Street, Clemson, South Carolina.

On the same date, December 7, 2018, the Department issued a Renewal Notice of Denial instructing Respondent that it was late submitting its renewal application and would have to pay a late filing fee of \$300 per month for the beer and wine permit and \$200 for the liquor license. This notice also stated that the renewal was denied because a principal, Jonathan Starkey, had not filed

**FILED**

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**SC ADMIN. LAW COURT**

State Income Tax returns for the years from 2014 through 2017. Ninety days were allowed for these taxes to be filed. In addition, the Department required that Respondent furnish verification of a liability insurance policy complying with S.C. Code Ann. § 61-2-145 (Supp. 2018).<sup>1</sup> Inscribed between the paragraph containing the notice of fees imposed for late application for renewal and the paragraph setting out additional grounds for denial on the basis of a principal's failure to file income tax returns and the liability insurance requirement was a single sentence: "You MUST cease all sales of beer, wine, and/or liquor until you receive your renewed license." (Petitioner's Exhibit 1, p. 14 and Petitioner's Exhibit 7.)

Respondent's owner (Starkey) admitted receiving this document but confessed that he did not read it. He provided evidence via three facsimile transmissions that he had the proper liability insurance. He then focused on his belief that he had ninety (90) days to file his taxes thereby resolving the identified renewal problems. He believed he could continue operating and selling beer, wine, and liquor, during the ninety (90) days he had to file his taxes.

On March 7, 2019, Respondent furnished the necessary documentation to the Department, and the Department issued an on-premises beer and wine permit and a restaurant liquor by the drink license. Although this permit and license was issued on March 7, 2019, it had a start date of December 1, 2018, a date consistent with his previous belief. On March 11, 2019, the Department instructed Respondent to return the erroneously dated permit and license. Respondent surrendered the permit and license to the Greenville District Office on March 12, 2019, and, in return, was given a permit and license dated as being issued on March 7, 2019, and having a start date of March 7, 2019.

Subsequently, by notice received by the Department on March 14, 2019, the State Law Enforcement Decision (SLED) informed the Department that Respondent sold alcoholic beverages on February 28, 2019, when Respondent was not licensed. SLED also informed the Department that a search warrant was obtained and that its execution revealed a copy of the Renewal Notice of Denial, it seized numerous cans of beer and bottles of wine and liquor, and the manager voluntarily provided sales records for the months of December, January, and February (2018 through 2019).

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<sup>1</sup> This provision, which went into effect on July 1, 2017, applies to all new or renewed permits or licenses for on-premises consumption after that date.

On March 20, 2019, the Department issued a Notice of Intent to Cancel Respondent's permit and license because its owner, Jonathan Starkey, lacks the moral character required to hold an alcohol permit and license as required by South Carolina law, S.C. Code Ann. §§ 61-2-100(D), 61-4-520(1), and 61-6-1820(2) (2009). The Department also seeks to sell or dispose of the alcoholic beverages seized by SLED.

Deputy Chief of Police Robert Bryan of Statesboro, Georgia, investigated a death resulting from a fight on August 28, 2014, between two under-age drinkers in a bar owned by Jonathan Starkey in Statesboro. As a result of the fight, an allegedly off-duty employee pled guilty to voluntary manslaughter.<sup>2</sup> Deputy Chief Bryan concluded that, from his observations, Jonathan Starkey is not fit to hold an alcohol license.

On cross-examination, Deputy Chief Bryan stated that Mr. Starkey was not indicted nor were any citations issued to him. Starkey was always forthcoming with him and always took responsibility for any mistakes.

Katherine Gatto, the mother of the young man killed in the Statesboro bar, notified the South Carolina Department of Revenue about the incident in Georgia. She opined that Mr. Starkey has a long history of disregarding local alcohol ordinances and state law and does not have the character to operate an establishment within the parameters of the law.

Krista Strzelczyk, an Alcoholic Beverage Licensing Supervisor for the Department, stated that renewal packages go to licensees sixty days prior to the expiration of a license. Respondent's location currently holds a permit and license but did not continuously hold a permit and license between November 30, 2018, and March 7, 2019. A renewal application was denied on December 7, 2018. The denial also advised the business that it must cease all sales of beer, wine, and/or liquor until its receipt of a renewed license. Ms. Strzelczyk also confirmed that Respondent obtained a local option permit in October 2019, after the renewal license was issued on March 7, 2019.<sup>3</sup> A revocation in another state could keep a principal from obtaining a license in South Carolina for two years for a beer and wine permit or five years for a liquor license. At the time the cancellation

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<sup>2</sup> Deputy Chief Bryan admitted that there was conflicting evidence regarding the perpetrator's work status at the time of the incident but that both individuals were underage and had been consuming alcoholic beverages.

<sup>3</sup> The Department contends that Study Hall did not have a local option permit between November 26, 2017, and October 20, 2019. However, no evidence was produced in this hearing to show that there were Sunday sales during this period. Ms. Strzelczyk stated that she believed there had been violations issued, but none were presented.

was proposed, the Department was not aware of other issues that would have prevented it from issuing the permit.

Special Agent Dorman, based on a tip from a wholesaler of beer that Study Hall's license had expired, confirmed with Ms. Strzelczyk that the location did not have a current permit or license.

On February 28, 2019, undercover SLED agents entered Respondent's restaurant and purchased beer. On that date, Respondent's permit and license had expired and had not been renewed. Following the undercover operation, SLED Agent Dorman obtained a search warrant and seized numerous cans and bottles of beer and bottles of wine and liquor. The owner was charged with operating without a permit in violation of S.C. Code Ann. § 6-4-560 (2009) and with unlawfully storing liquor in a place of business in violation of S.C. Code Ann. § 61-6-4060(A). In addition, the manager furnished sales reports showing sales of beer, wine, and liquor, for the months of December 2018, January 2019, and February 2019.<sup>4</sup>

In 2017, an undercover operation revealed an underage sale. This event was the only violation prior to the February 28, 2019, undercover operation.

Dorman admitted that based on his interactions, Mr. Starkey has been cooperative and compliant although he has not complied with the law.

The City of Clemson police chief, Jimmy Dixon, met with Starkey prior to Study Hall's opening. He stated that Starkey himself has a fine reputation in the community. The bar, on the other hand, has a reputation as a place for underage drinking, and he does not believe that Starkey is fit to hold an alcohol license in South Carolina.

Chief Dixon admitted that he had not filed any protests against licensing or license renewal of bars in his jurisdiction. He also admitted that he received telephone calls about the Statesboro incident and that Starkey offered to show him a video of the incident. He refused to view the video or discuss the matter with Starkey. He advised Starkey that he should follow the rules and regulations established by the Department and the laws of South Carolina.

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<sup>4</sup> Special Agent Dorman produced a report of the investigation including the execution of the search warrant. This report, admitted as Petitioner's Exhibit 8, included the Renewal Notice of Denial which informed the licensee that all sales of beer, wine, and/or liquor must cease until a renewed license was issued. It also incorporated the reports showing sales of beer, wine, and liquor for December 2018, January 2019, and February 2019. The search warrant return included some eighteen pages listing the alcoholic beverages seized.

Jonathan Starkey the sole owner of Study Hall, LLC, testified that he worked with a Department employee to meet the requirements of state laws and regulations. He told this employee about what happened in Statesboro, that a patron had died, and that he voluntarily surrendered his license.

He admitted that he did not apply to renew his license until December 7, 2018. He was given a notice of denial stating that he needed to provide proof of insurance and file his income taxes. He resolved the insurance issue while at the Department's regional office. According to Starkey, the Department employee told him he had ninety (90) days to resolve the issue with his taxes.<sup>5</sup> He discussed the issues but did not read the denial notice. He believed could operate during the ninety days he was given to file his tax returns. He worked with his accountant and filed his returns within the ninety (90) days. During this time, he filed monthly sales tax reports and paid the sales taxes due for December 2018, January 2019, and February 2019.

Starkey kept the denial at his home office and allowed the previous license to remain on display at the business. He gave the Department a check with the renewal application on December 7, 2018. The Department accepted and negotiated the check. The Department also accepted his monthly sales tax returns and the accompanying payments. Law enforcement officers were in the bar regularly, but no one said anything about the expired license.

On March 7, 2019, Starkey provided the necessary documentation to the Department and was issued a permit and license with start dates of December 1, 2018. He was contacted on March 11, 2019, and instructed to return them. He returned the permit and license with start dates of December 1, 2018, and was issued a permit and a license with start dates of March 7, 2019. On March 20, 2019, Starkey was informed by letter that the March 7, 2019, permit and license were also erroneously granted and was notified that the Department intended to cancel his On-Premises Beer and Wine Permit and his Restaurant Liquor by the Drink License because he lacked "the requisite moral character to hold an alcohol permit and license." He was given the option of consenting to the cancellation and surrendering the permit and license within ninety (90) days or protesting the proposed cancellation, also within ninety (90) days. Although the letter did not

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<sup>5</sup> Although the Department disputes this claim, the notice provided and referenced by Starkey includes the following language in the bullet point identifying Starkey's failure to file income taxes for years 2014 through 2017 as a reason for denying the renewal application: "Notify Alcohol Beverage Licensing within 90 days that the taxes have been filed." (Petitioner's Exhibit 1, p. 14 and Petitioner's Exhibit 7.)

indicate that alcohol sales could continue during the ninety (90) days or through the pendency of further appeal, that extension of the erroneously issued permit and license has, in fact, occurred.

When Special Agent Dorman returned to serve warrants, Starkey, who was in Georgia, instructed his manager to cooperate by printing the sales reports and told him where to find the Renewal Notice of Denial that he believed would show that he had a temporary permit and license for ninety (90) days. When the manager gave the license to Agent Dorman, Dorman explained to Starkey that the denial prohibited the sale of beer, wine, and liquor and was not an extension. Starkey stated that he stopped alcohol sales in accordance with Dorman's instructions.

Starkey denied having any criminal convictions or charges prior to the February 28, 2019, incident. He was served with one Arrest Warrant for operating without a permit and a second one for unlawfully storing alcoholic liquors in a place of business. Starkey has applied for Pre-Trial Intervention and paid the application fee for that program.

He uses breathalyzers to monitor his staff and identification card readers to prevent under-age drinking. He increased staff and uses gates to control crowds when there are events that attract large numbers of patrons.

He denied having defrauded anyone or writing any bad checks. He has provided guidelines for his staff to avoid having impaired workers. He also makes donations to local charities and law enforcement and helps individuals in need.

After Study Hall's previous incident of underage drinking, Starkey discharged the responsible employee.

Starkey admitted that he sold alcoholic beverages on Sundays for approximately two years without paying the local option tax. He also admitted that he owes the State of South Carolina between thirty (30) and forty (40) thousand dollars in personal income taxes and is paying those taxes on an agreed payment plan, which he has been paying for about a year.<sup>6</sup>

His Georgia attorney, Wesley Taulbee, assisted Starkey in opening the bar in Statesboro, Georgia, and in negotiating a settlement with the City of Statesboro concerning the incident in the bar there. He stated that Starkey has good moral character, has been honest with him, has been straightforward, and accepts responsibility for his actions. He admitted that Starkey might miss

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<sup>6</sup> The Court presumes that the amount owed includes penalties and interest.

details but does not make the same mistake twice. Starkey focuses on cooperating with law enforcement.

Chris Cartee, Fire Marshall and Arson Investigator for the City of Clemson, stated that Starkey and his staff have been cooperative and professional and done everything he has requested. Starkey has controlled access and counted customers to stay within occupancy limits. In his opinion, Starkey has been honest and is compliant with the fire code. He considers Starkey to be of good moral character. He admitted that he was not aware of alcohol licensing requirements and did not know that Starkey was operating without proper licensing.

### CONCLUSIONS OF LAW

Based upon the foregoing findings of fact, I conclude the following as matters of law:

1. Jurisdiction over this matter is vested with the ALC pursuant to South Carolina Code Sections 1-23-310 *et seq.* (2005 & Supp. 2017), 1-23-600(B) (Supp. 2017), and 61-2-260 (2009). The standard of proof in an administrative proceeding such as this is a preponderance of the evidence, unless otherwise specified. *Anonymous v. State Bd. of Med. Exam'rs*, 329 S.C. 371, 375, 496 S.E.2d 17, 19 (1988); *see also* S.C. Code Ann. § 1-23-600(A)(5) (Supp. 2017). "A 'preponderance of the evidence' is evidence which convinces as to its truth." *Gorecki v. Gorecki*, 387 S.C. 626, 633, 693 S.E.2d 419, 422 (Ct. App. 2010) (citation omitted). Consequently, the court's findings "may not be based upon surmise, conjecture, or speculation, but must be founded on evidence of sufficient substance to afford a reasonable basis for it." *See Tims v. J.D. Kitts Const.*, 393 S.C. 496, 503, 713 S.E.2d 340, 343-44 (Ct. App. 2011) (citations omitted). The party seeking a license has the burden of proving it has met all the statutory requirements for the license. 48 C.J.S. *Intoxicating Liquors* § 186 (2018 Update).
2. The weight and credibility assigned to evidence presented at a hearing is committed to the province of the trier of fact. *See S.C. Cable Television Ass'n v. S. Bell Tel. & Tel. Co.*, 308 S.C. 216, 222, 417 S.E.2d 586, 589 (1992) (citation omitted). The trier of fact who observes a witness is in the best position to judge the witness's demeanor and veracity and to evaluate the credibility of his testimony. *See, e.g., Woodall v. Woodall*, 322 S.C. 7, 10, 471 S.E.2d 154, 157 (1996) (citations omitted); *Wallace v. Milliken & Co.*, 300 S.C. 553, 556, 389 S.E.2d 448, 450 (Ct. App. 1990) (citation omitted).

3. The issuance of a license to sell alcohol “rests in the discretion of the body or official to whom the duty of issuing it is committed . . . .” *Palmer v. S.C. Alcoholic Beverage Control Comm’n*, 282 S.C. 246, 248, 317 S.E.2d 476, 477 (Ct. App. 1984) (citations omitted); *see also Wall v. S.C. Alcoholic Beverage Control Comm’n*, 269 S.C. 13, 235 S.E.2d 806 (1977). “A license may properly be refused where a statutory ground for refusal exists, provided there is a reasonable basis for believing in its existence . . . .” 48 C.J.S. *Intoxicating Liquors* § 194 (2018 Update). However, “[g]ood cause must be shown for the denial of a license.” *Id.*<sup>7</sup>
4. In this state, the requirements for beer and wine permits are set forth in Section 61-4-520 (2009) of the South Carolina Code, and the requirements for liquor by the drink licenses for restaurants are set forth in Section 61-6-1820 (2009 & Supp. 2018).
5. Regarding owners and principals of a business applying for a permit or license, “[l]icenses and permits may be issued only to the person who is the owner of the business seeking the permit or license.” S.C. Code Ann. § 61-2-100(A) (2009). Several statutory provisions in South Carolina address the character requirements of an applicant for beer and wine permits and liquor by the drink licenses. Section 61-2-100(D), which applies to all liquor licenses and beer and wine permits, provides that “[t]he Department may not issue a license or permit under this title to any person unless the person and all principals are of good moral character.” S.C. Code Ann. § 61-2-100(D) (2009).
6. With respect to beer and wine permits, Section 61-4-520(1) states that:
 

A retail permit authorizing the sale of beer or wine must not be issued unless:

  - (1) The applicant, a partner, or co-shareholder of the applicant, and each agent, employee, and servant of the applicant to be employed on the licensed premises are of good moral character.

S.C. Code Ann. § 61-4-520(1) (2009). Finally, Section 61-4-540 similarly states that, before the issuance of a beer and wine permit, the Department must find that “the applicant is fit to sell beer and wine.” *See* S.C. Code Ann. § 61-4-540 (2009).
7. With respect to retail liquor licenses, Section 61-6-1820(2) provides that:
 

The department may issue a [liquor] license . . . upon finding:

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<sup>7</sup> Although the Department proposes “cancellation” of this permit and license which it contends were issued in error, the statutory grounds are those that would apply to a denial, suspension, or revocation.

(2) The applicant, if an individual, is of good moral character or, if a corporation or association, has a reputation for peace and good order in its community, and its principals are of good moral character.

S.C. Code Ann. § 61-6-1820(2) (2009).

Additionally, Section 61-6-110(3) provides that an applicant for a retail liquor license is ineligible if “[the applicant] or the person who will have actual control and management of the business proposed to be operated . . . is not of good repute.”<sup>8</sup> S.C. Code Ann. § 61-6-110(3) (2009).

8. The term “good moral character” is not defined with particularity in South Carolina law. The South Carolina Attorney General has opined that:

What constitutes good moral character in a given case, then, we cannot say for there is no single criterion in South Carolina by which to judge it; therefore, the Commission itself must determine in each instance whether one possesses it or not. Yet in making that determination, the Commission would not be justified in refusing a license simply upon a “moral appraisal,” or either because previous misconduct which is not relevant to the conduct of the business for which the license is sought because of a remote conviction of a minor offense, or because of an unproved accusation of a crime.

[W]hile good moral character does not mean ‘moral excellence’ . . . it does mean that one must possess all of the elements essential to make up such a character, among those being common honesty and veracity.

1969 Op. S.C. Att’y Gen. 159 (1969), 1969 WL 10708 (citations omitted); *see also* 48 C.J.S. Intoxicating Liquors § 171 (2018 Update) (“[T]here is no single and absolute criterion or standard, and the licensing authorities must judge whether the acts and conduct shown are sufficient in themselves or as an index to character to disqualify the applicant.”).

9. Accordingly, “[m]oral character,” as used in a statute on qualifications required for liquor license holders, means not only the ability to distinguish between right and wrong, but the character to observe the difference, the observance of rules of right conduct, and conduct which indicates and establishes qualities generally acceptable to the populace for positions

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<sup>8</sup> Good repute is a separate component of character, but it is related to a person’s overall good character. In a prior order from this court, one administrative law judge persuasively described moral character as a component of repute. “Moral character is one component of reputation, while the collective opinion of one’s peers regarding one’s deportment, integrity, and community standing is another component. Evidence relating to each component is relevant and probative.” *S.C. Dep’t of Revenue and Taxation v. Burris*, Docket No. 96-ALJ-17-0201-CC, 1999 WL 146238 (S.C. Admin Law Ct. July 24, 1996).

of trust and confidence.” 48 C.J.S. Intoxicating Liquors § 171 n.1 (2018 Update). Likewise, a license may be refused for lack of moral character “to a person who is not likely to carry on, in conformity with law, the business for which the permit is issued, . . . who deliberately misrepresents or knowingly conceals a material fact in order to obtain a license, or whose conduct in other respects does not meet the necessary standards relating to character.” 48 C.J.S. Intoxicating Liquors § 171 (2018 Update).

10. Permit or license applicants that satisfy the statutory criteria are entitled to issuance of the permit or license. *See* 48 C.J.S. Intoxicating Liquors §§ 166 & 194 (2018 Update).

The Department proposes to cancel the Respondent’s permit and license because the Respondent is not of good moral character due to the continued sale of beer, wine, and liquor after the expiration of its permit and license.

While the Respondent does not dispute the continued sale of beer, wine, and liquor after the expiration of its permit and license, Respondent argues that the violation occurred due to a misunderstanding of the Denial Notice, as well as misinformation received from the Department. Specifically, Mr. Starkey stated that he understood the Denial Notice to mean that Respondent could continue selling beer, wine, and liquor for up to ninety (90) days, the time he was given to file his income taxes.

While the court recognizes that the Respondent continued to sell beer, wine, and liquor after the expiration of its permit and license, it is evident that there was confusion regarding the continued validity of the Respondent’s permit and license. The Court notes that a permit and license was issued on March 7, 2019, with an effective date of December 1, 2018. This date is consistent with Respondent’s belief that he had ninety (90) days to file personal income taxes while continuing to sell alcoholic beverages. Although Mr. Starkey did not read the Denial Notice, his interaction with the Department was sufficiently confusing that a reasonable person could have believed that the restaurant could continue operating while the tax issue was being resolved.

In view of the forgoing, the court is not convinced that the violation stemming from the Respondent’s failure to read and correctly interpret the Denial Notice exhibits deficient moral character. Based on the confusion and misinformation proceeding from the Department’s first renewal, I do not find that the unlicensed sales on which taxes were paid demonstrate the absence

of moral fitness to operate a business in conformity with the law.<sup>9</sup> *See Gantt v. Columbia Coca-Cola Bottling Co.* 204 S.C. 374, 380, 29 S.E.2d 488, 490 (1944) (“an intent to defraud the United States Government is an essential element. For this reason we think the charge to which appellant pleaded guilty involves the element of moral delinquency.”) Additionally, although criminal citations were presented following the undercover operation on February 28, 2019, Respondent acknowledged the unlawful conduct but believed that it was operating in compliance with the law and would not have continued selling had Respondent realized that doing so was unlawful.

Respondent’s failure to follow the law, therefore, was not due to an inability to distinguish between right and wrong. Moreover, the evidence reflects that Mr. Sharkey possesses the ability to comply with the law when properly informed. The court concludes that he possesses the requisite moral character to hold an alcoholic beverage license. *See Columbia Wing Shack, LLC, d/b/a Columbia Wing Shack v. South Carolina Department of Revenue*, Docket No. 18-ALJ-17-0194-CC (S.C. Admin. Law Ct. August 28, 2018).

Thus, the Respondent has met its burden of demonstrating compliance with the statutory requirements for licensure. Petitioner’s proposed cancellation of Respondent’s beer and wine permit and business liquor by the drink license is denied, subject to the conditions set forth below.

### ORDER

Based upon the above findings of fact and conclusions of law, the court finds that Respondent meets the applicable requirements for licensure.

**IT IS THEREFORE ORDERED** that the Department shall **GRANT** the Petitioner’s renewal application for an on-premises beer and wine permit and restaurant liquor by the drink license, subject to the following conditions:

1. That the Petitioner’s permit and license shall be suspended for ninety (90) days, beginning with the date that this order becomes final;
2. That Jonathan Starkey shall continue to comply with the payment plan for his South Carolina income taxes; and

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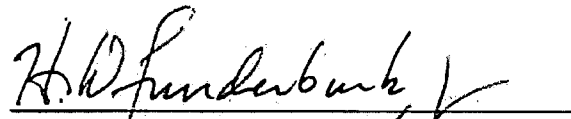
<sup>9</sup> “With regard to crimes involving alcoholic beverages, it has been held that the illegal manufacture of whiskey constitutes a crime of moral turpitude where the offense involves an element of intent to defraud tax authorities . . . JOHN D. GEATHERS & JUSTIN WERNER, *THE REGULATION OF ALCOHOLIC BEVERAGES IN SOUTH CAROLINA*, 219 (2007).

3. That Petitioner will cooperate with any investigation and audit of other business taxes which might be owed, including Local Option Permits, or admissions taxes and shall remit such taxes as are determined to be due within a reasonable time set by the Department or by the final decision of a reviewing court.

A violation of any of these conditions shall constitute a violation of the Petitioner's alcoholic beverage permit and license and may subject Respondent to further suspension or to revocation. In addition, the Department's Application to sell or otherwise dispose of beer, wine, and liquor seized pursuant to the search warrant executed on February 28, 2019, is **GRANTED**.

**AND IT IS SO ORDERED.**

January 15, 2020  
Columbia, South Carolina

  
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H.W. Funderburk, Jr.  
Administrative Law Judge

Docket No. 19-ALJ-17-0269-CC

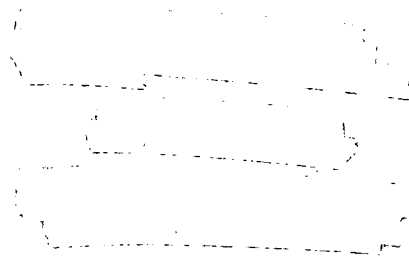
CERTIFICATE OF SERVICE

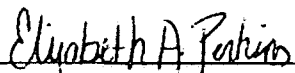
I, Elizabeth A. Perkins, hereby certify that I have this date served the **Final Order** in this case upon all parties to this case by depositing a copy hereof, in the United States mail, postage paid, in the Interagency Mail Service, or by electronic mail to the address provided by the parties and their attorneys as follows:

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January 15, 2020  
Columbia, SC



  
Elizabeth A. Perkins  
Judicial Law Clerk

**RECEIVED**

MAR 10 2020

SC Court of Appeals