THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
JUL 09 2021
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Bentley D. Price

Appellate Case No. 2020-000936

Skip Hoagland, ... Appellant,

v.

John Tecklenburg, in his official capacity, the City of Charleston, and the City of Charleston Police Department, ... Respondents.

RECORD ON APPEAL

VOLUME 2

Taylor M. Smith IV
S.C. Bar No. 101584
Harrison, Radeker & Smith, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Appellant

Christopher T. Dorsel
S.C. Bar No. 72504
SENN LEGAL, LLC
P.O. Box 12279
Charleston South Carolina 29422
(843) 556-4045
Attorney for Respondents

INDEX

Orders

Order Denying Plaintiff Motion to Reconsider 1

Order Denying Defendant Motion to Reconsider 4

Order Denying Permanent Injunction and Sentencing for Contempt 7

Order Finding Defendant in Contempt of Court 21

Rule to Show Cause Regarding Civil Contempt 24

Order Prohibiting Pretrial Communications and Publicity 26

Order Denying Defendant Motion to Amend 28

Order Resolving Several Motions 39

Consent Order Regarding Defendant Pretrial Statements 43

Rule to Show Cause Regarding Consent Order 45

Consent Order on Plaintiff's Motion for Temporary Injunction 46

Pleadings

Summons and Verified Complaint with Exhibits 50

Answer to Verified Complaint.....86

Motions

Plaintiff Motion to Reconsider Order Denying Permanent Injunction 92

Defendant Motion to Reconsider Order Sentencing Hoagland with Exhibits 108

Defendant Memorandum in Opposition to Order of Contempt with Exhibits.....147

Defendant Memorandum on Standard for Permanent Injunction with Exhibits 340

Defendant Reply to Motion for Contempt and Rule to Show Cause 446

Plaintiff Exhibits in Support Motion for Contempt and Rule to Show Cause 453

Plaintiff Memorandum in Support of Motion for Contempt with Exhibits 466

Plaintiff Motion for Rule to Show Cause with Exhibits 544

Plaintiff Motion and Memorandum in Support of Sanctions with Exhibits 674

Defendant Motion to Amend Answer to Add Counterclaims 685

Plaintiff Motion to Enforce Settlement Agreement with Exhibits 687

Plaintiff Memorandum in Support Motion for Contempt with Exhibits 699

Defendant Reply to Motion for Contempt and Protective Order 739

Plaintiff Motion to Hold Defendant in Contempt with Exhibits 743

Plaintiff Motion for Temporary Injunction with Exhibits 814

Transcripts

Transcript of December 11, 2015 Hearing 822

Transcript of January 30, 2018 Hearing 845

Transcript of March 9, 2020 Trial 889

Trial Exhibits

Court Exhibit 1 1121

Court Exhibit 2 1246

Court Exhibit 3 1264

Court Exhibit 4 1304

Plaintiff Exhibit 1 1351

Plaintiff Exhibit 2 1352

Plaintiff Exhibit 3 1353

Plaintiff Exhibit 4 1354

Plaintiff Exhibit 5 1356

Plaintiff Exhibit 6 1357

Plaintiff Exhibit 8 1359

Plaintiff Exhibit 10 1361

Plaintiff Exhibit 13 1368

Plaintiff Exhibit 14 1369

Plaintiff Exhibit 15 1370

Plaintiff Exhibit 16 1372

Plaintiff Exhibit 17 1375

Plaintiff Exhibit 18 1376

Plaintiff Exhibit 19 1378

Plaintiff Exhibit 21 1379

Plaintiff Exhibit 22 1381

Plaintiff Exhibit 23 1389

Plaintiff Exhibit 36 1391

Plaintiff Exhibit 37 1417

Plaintiff Exhibit 105 1467

Plaintiff Exhibit 108 1470

Plaintiff Exhibit 108A 1471

Other

Stipulation Resolving Defendant Partial Summary Judgment Motion w/ Exhibit .. 1472

Affidavit of Gregory Alford (March 8, 2020) with Exhibits 1571

Affidavit of Gregory Alford (March 18, 2020) 1608

Affidavit of John P. Linton, Jr. 1611

Defendant/Appellant-Respondent Notice of Appeal 1614

Plaintiff/Respondent-Appellant Notice of Appeal 1616

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

E-Mail #1

Gmail by Google

Gregg Alford <gregg@alfordlawsc.com>

Re: New 100 k cash reward offered by Skip Hoagland !!!!!!To anyone who provides info leading to the arrest, conviction and imprisonment of any local official, school employee, Chamber employee and local lawyer tied to this corruption.

1 message

CC Hoagland <skiphoagland@yahoo.com> Sat, Jan 13, 2018 at 1:04 AM
To: Walker@wgfllaw.com, KimL@hiltonheadislandsc.gov, gregg@alfordlawsc.com, Linton@wgfllaw.com, Barrett Brewer <BBrewer@clawsonandstaubes.com>, bstevenson@clawsonandstaubes.com
Cc: Attorney General Alan Wilson Attorney General Allan Wilson <AWilson@scag.gov>, shamm@ethics.sc.gov, mburchstead@ethics.sc.gov, dpascoe@scsolicitor1.org, Sled Paul Grant Sled Paul Grant <mkeel@sled.sc.gov>

My focus now is 100% law enforcement! This illegal criminal lawsuit is not about lawyers and judges, it's about a criminal investigation and illegal crime committed. The insanity of treating this as lawsuit must end. Gregg Alford and all connected to him should go to prison. Not one Lawyer or even Judge friends of mine have ever heard of any of this ever happening. No one even knows how to deal with all this, including all the lawyers.

Mr Linton/ Walker, you are in bad company receiving bad advice, from crook Lawyer Alford, and your being used by the crooks on Hilton Head as their puppet lawyers free worse. I can assure you the stolen 200k tax money you were paid with knowing this was stolen, must be paid back to tax payers.

Mr Linton / My Walker perhaps reality hasn't set in yet with both of you, you will get zero money for your services from me or my insurance company. As you know my insurance company has already filed a lawsuit against me telling me that they will not cover any damages and will only pay for my defense, so therefore you are left with collecting from me in Florida. As you know I'm retired and don't own anything and haven't for years. The other point is I don't want my insurance company robbed by this corruption to pay you as well. I want Alford or his client Kim Likins to be forced to pay this money back.

The lawyers figure it's only insurance money who cares, this is not me. I do care as I don't want to see my insurance company again robbed by crooked lawyers, as all this does is raises all our insurance premiums.

This illegal criminal 200k tax funded lawsuit has damaged my wife and I severely with our insurance company not renewing and canceling our insurance policy.

This has caused a total destruction of my wife and I's perfect 50 yr insurance track record and now left us uninsured, as our insurance was canceled/ not renewed, and we are considered high risk and no one will insure us. This has left us with no protection from future lawsuits filed by lying thieving crooked corrupted lawyers and their lying corrupted thief clients. You have caused my insurance company to pay 200k to defend me, and this drive them to cancel our policy, and I can't blame them.

Mr.Linton / Walker since you will not get me or my insurance company to pay for your theft, all you will get is questioning by law enforcement and a bad reputation. You are judged by the company you keep, Gregg Alford was your worse possible choice . You play with fire long enough, you will eventually get burned.

Mr Linton, you have demonstrated as a young Lawyer, you will play dirty and do anything to win on behalf of the crooks. I will assure you this will not work. As a young dirty lawyer, you are getting ready to learn perhaps your first hard lesson in life from an older adversary. The lesson is a result you were not trained to deal with a person like me, who presents facts, has nothing to hide, nothing to lose, and is fully prepared like no one you know, or will ever meet again to fight corruption in SC as a retired man from Florida. Whats sad Is most normal people with no one to help them, could never survive this lying corrupt type attack in corrupt SC, with a legal system run by incestuos crooked politicians. I will leave it at that. I am very happy and excited that I can fight this corruption and filth to help others in the future; as well as help change state laws

Lying Linton, I called Trish Heichel yesterday and explained all to her about your fabricated lie you are desperately trying to manifest into your sick reality. You keep saying and insinuating in all depos I said that Kim Likins was a danger to children "a pedophile", as stated by you in Marv Glickmans depo at crook Gregg Alfords office. No one would believe this, and no one would believe I would say this without proof. Everyone knows I say everything and anything and blast 10 emails per week min to educate and expose crimes. People also know I don't fight dirty, and don't have to. I am just a messenger on presenting facts.

Mr Linton, your mind must be equally as sick and twisted as Gregg Alfords, or you would not play this type game, to try to win money from this lawsuit, you are made for each other. You both will not get away with this.

Technology is very close, where devices will be able to detect lies from people like you and Alford, who think you are smarter than others or beyond the law. I can assure you win, lose, or draw in court, crook Alford and Kim Likins is paying this 200k back

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

from their pockets and all you lying crooked lawyers will get ZERO involved will get zero. You can thank Alford for getting you involved in all this, he already knows this and assume has kept this info from you.

Crook Lawyer Alford, shooting a bird finger at me close to his chest in deposition and causing my football field reaction, I assume most real men will understand including judges who played sports. I assume no one on this email has ever heard of a lawyer ever doing this. This is just another sign on what and who we are all dealing with. Do I regret saying, I or someone should beat your brains out - yes I do. Was I mad Alford did a FU to me - yes. Do I still feel someone needs to beat the crooked lying corruption out of Alford, yes. Harm to people come in different forms, physical, mental stress, financially. My words are nothing compared to Alford/Likins 200k schemed theft of tax money.

Mr Linton/ Walker, will see how all this plays out for you. My guess is it will not end well for you, or your sick, lying, twisted thinking, corrupted, crooked, thief buddy attorney Alford, who needs to be disbarred, investigated and put in prison. It's lawyers like you who harm your profession.

No Thanks!!!!

Begin forwarded message:

From: Skip Hoagland <shoagland@me.com>
Date: January 11, 2018 at 5:51:15 PM EST
To: "zoomru@yahoo.com" <zoomru@yahoo.com>, gregg@alfordlawsc.com, david tigges <dtigges@mcnair.net>, JohnM@hiltonheadislandsc.gov, bill miles <bmiles@hiltonheadisland.org>
Cc: Marilyn Bullard <bullardpiwko@aol.com>, Ryan McAvoy <mcavoylegend@gmail.com>, Brian Tolley <btolley@islandpacket.com>, "dpascoe@scsolicitor1.org" <dpascoe@scsolicitor1.org>, Sled Paul Grant Sled Paul Grant <mkeel@sled.sc.gov>, Attorney General Alan Wilson Attorney General Allan Wilson <AWilson@scag.gov>, "shamm@ethics.sc.gov" <shamm@ethics.sc.gov>, "mburchstead@ethics.sc.gov" <mburchstead@ethics.sc.gov>, "jbagnall@ethics.sc.gov" <jbagnall@ethics.sc.gov>, "brogers@scpress.org" <brogers@scpress.org>, Jay Bender <jbender@brblegal.com>, "jwiendl@sonesta.com" <jwiendl@sonesta.com>, Duane Parrish <dparrish@scprt.com>, "William G. Bill Herbkersman" <schsdistrict118@aol.com>, "tdavis@harveyandbattey.com" <tdavis@harveyandbattey.com>, Weston Newton <wnewton@jsplaw.net>, "jeffbradley@schouse.gov" <jeffbradley@schouse.gov>, "lsulka@townofbluffton.com" <lsulka@townofbluffton.com>, "KimL@hiltonheadislandsc.gov" <KimL@hiltonheadislandsc.gov>, Terry Finger <tfinger@fingerlaw.com>, Marc Frey <mfrey@freymedia.com>, gerard mahieu <gerardmahieu@aol.com>, Liz Farrell <efarrell@islandpacket.com>, Jim Bequette <jwbterp@aol.com>, rick caporale <rcaporale@bcgov.net>, Josephine A Orischak <Josephine.Orischak@beaufort.k12.sc.us>, Covert Michael <mcovert@bcgov.net>, Stern Allan <spiker149@hargray.com>, Don Brashears <Tmbdab@aol.com>, Auditor <auditor@bcgov.net>, "s. fobes" <sfobes@bcgov.net>, Tom Davis <tom@senatortomdavis.com>, Deann Komanecky <deann.komanecky@blufftontoday.com>, Tonya V Crosby <tonya.crosby@beaufort.k12.sc.us>, " <info@windrunnerstables.com>" <info@windrunnerstables.com>, Christina S Gwozdz <christina.gwozdz@beaufort.k12.sc.us>, Wilbur M Payne <wilbur.payne@beaufort.k12.sc.us>, Tim Scott <joe_mckeown@scott.senate.gov>, Taylor Smith <taylor@harrisonfirm.com>, Giles Hall <usn1066@gmail.com>, Earl Campbell <earl.campbell@beaufort.k12.sc.us>, David R Striebinger <david.striebinger@beaufort.k12.sc.us>, David Williams <dwilliams@sled.sc.gov>, Joseph R Dunkle <joseph.dunkle@beaufort.k12.sc.us>, Lisa Gibson <lgibson@scag.gov>, Robyn L Cushingberry <Robyn.Cushingberry@beaufort.k12.sc.us>, REBECCA BASS <muttleycrew2008@gmail.com>, John Crangle <johncrangle2@gmail.com>, Staff <contact@Beaufortwatchdog.org>, Joan Deery <jdpc@hargray.com>, Cynthia W Gregory <cynthia.gregory@beaufort.k12.sc.us>, "shannonerickson@schouse.org" <shannonerickson@schouse.org>, Alden Bauer <aldenbauer706@gmail.com>, Jiaco <jiaco@bellsouth.net>, Cnrgbr <cnrgbr@hargray.com>, Sled Paul Grant Sled Paul Grant <pgrant@sled.sc.gov>, Kelly Meyerhofer <kmeyerhofer@islandpacket.com>, "s. rodman" <srodman@bcgov.net>, brian flewelling <brianf@bcgov.net>, "g. dawson" <gdawson@bcgov.net>, Jennifer A Staton <jennifer.staton@beaufort.k12.sc.us>, Jerry Stewart <jstewart@bcgov.net>, Mark Sanford <marksanford99@gmail.com>, "michaelrivers@schouse.gov" <michaelrivers@schouse.gov>, Richard Gregory <rgregory@sled.sc.gov>, fran bisi <eyelandart@yahoo.com>, Geraldine C Kinton <Geraldine.Kinton@beaufort.

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

k12.sc.us>, Jerry at the Beach <gringoviejotwo@yahoo.com>, Ami Franklin <ami@ethics.sc.gov>, "Thenerve.org Rick" <rbrundrett@islandpacket.com>, Mary M Cordray <mary.cordray@beaufort.k12.sc.us>, John Dowling <dowlingjohn287@gmail.com>, "peter@mediafeedia.com" <peter@mediafeedia.com>, Will Folks <will.folks@gmail.com>, "david@myrtlebeachsc.com" <david@myrtlebeachsc.com>, David Lauderdale <letters@islandpacket.com>, Alex Kinkaid <akincaid@islandpacket.com>, Jeremia Froyland <jeremiafroyland@gmail.com>, Art Davis <art@globallylocally.com>, "josh.metnick@gmail.com" <josh.metnick@gmail.com>, "susan@surfcityusa.com" <susan@surfcityusa.com>, "stever@hiltonheadislandsc.gov" <stever@hiltonheadislandsc.gov>, "brianh@hiltonheadislandsc.gov" <brianh@hiltonheadislandsc.gov>, "gregg@alfordlawsc.com" <gregg@alfordlawsc.com>, "davidb@hiltonheadislandsc.gov" <davidb@hiltonheadislandsc.gov>, David Ames <amesco@earthlink.net>, "pbrowning@postandcourier.com" <pbrowning@postandcourier.com>, Scott Brandon <SBrandon@thebrandonagency.com>, Beverly Shelly <bshelley@scprt.com>, "eriggs949@gmail.com" <eriggs949@gmail.com>, jgruber@bcgov.net, Linton@WGFLLAW.com, drew laughlin <drew@laughlinandbowen.com>, Steve Birdwell <sbirdwell@seapines.com>, pruett.john.s@gmail.com, dlauderdale@islandpacket.com, "Kesmodel, David" <David.Kesmodel@wsj.com>, Barrett Brewer <BBrewer@clawsonandstaubes.com>
Subject: Re: New 100 k cash reward offered by Skip Hoagland !!!!!!To anyone who provides info leading to the arrest, conviction and imprisonment of any local official, school employee, Chamber employee and local lawyer tied to this corruption

Chris, I founded and build a company involved in technology. Your email was perfect. If I was a crook, I would be scared to death. You are right, no escape for any of the people that I and other honest hard working tax payers want to see justice served on. The list is long and the recent raid by the FBI on Berkeley County Chamber and School CFO and his theft of 386k is just the beginning and tip of the iceberg.

Lets all fight, not fear being vocal to stop SC crimes, by incestuos corrupted crooks and thieves of our tax monies in 2018. We must all attend Town council meetings like I do to not nicely, but harshly criticize our elected officials who continue to allow this unconstitutional misuse and theft of our tax monies. I will do all the lawsuits and spend the money, I just ask everyone to speak up under your free speech rights.

We need 10 David Pascoes and 100 FBI and IRS agents since we have so much corruption. After Berkeley SC raid by the FBI and first type raid in 100 yrs on these institutions, this will send a loud clear message. Unlike the corrupted incestuos politicians, lawyers with influence even over our judges and SC law enforcement agencies, the federal agencies could care less and have no fear. This is why you saw the the FBI raid on Berkeley, not the local Police dept!

I am convinced the majority of SC Town councils, Town managers, School system administrators, Chamber, Cvb executive directors and city Dmo's will result like Berkeley County SC, with the same and different crimes involved. I am sure many will also result in prison like Berkeley. Only one way to clean the slate, go city by city. We simply do an independent forensic audit conducted by a local FAC (Forensic Audit Committee) made up of local retired CPA's and paid CPA's to do this. Links below explains all on how to audit a school system and a non-profit chamber misusing tens of millions of our tax funds in SC. It's so easy, the FBI and IRS put together a trained team, take the info experts like myself and others provide, and go city by city with this investigation team to work with the local FAC's made up of local CPA's and even the local city and county auditor who would have to cooperate. Start with the largest 3-6 cities in SC and after they all result in some form of waste, theft and corruption being discovered which is certain like Berkeley SC, the rest of the cities in SC will clean up their act in fear of being next.

Also once heads of state agencies like SC PRT, Duane Parrish and SC Terc, Ed Riggs are audited, more wrong doing will be exposed on top of what we already know. 58M for SC Dmo type promotion and all the millions of matching grants to state chambers, CVB's, Dmo's in the tens of millions with zero oversight. I predict our findings will shock this state and all who trusted these institutions for many years. Folks, we have been lied to, cheated, robbed and had fraud committed to us for last 50-100 yrs. Enough is

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

enough!! We are smarter today since the internet was first launched more publicly in 1993 and now have all the information and search tools to clean this all up.

Again, read these important links below, just the intro page will take 5 mins. Let's see what the crooked lawyers think about all this? They won't sue me for calling them all crooked, because they know this will result in depos and discovery.

How to do a School audit:
https://www.yankeeinstitute.org/wp-content/uploads/2015/07/Ending-Corruption-and-Waste-In-Your-Public-School.pdf

How to audit a Chamber Cvb Dmo:
https://www.mypalmbeachclerk.com/uploadedFiles/Public_Funds/conv_ctr_audit_report.pdf

The corrupted SC incestuos crooks seem to have no clue every email and text they have ever sent can be accessed by the FBI, IRS and DOJ.

I welcome anyone to see all my emails and text, including my dirty jokes. Dirty funny jokes are not a crime, theft and unconstitutional misuse of public funds and fraud is.

The investigations all needs to start with lawyers of all the crooks and some lawyers also corrupted, like crooked and involved lawyer David Tigges, past Chairman of the chamber, not just the lawyer to immune him. Add the following crooked lawyers:

Crook Gregg Alford, Hilton Head Town lawyer has committed theft, deceit and fraud with our tax monies to enrich his crooked pockets. He is in violation of his Hilton Head Town lawyer contract. What he did was illegal and criminal, yet he is allowed to remain a practicing lawyer?
Crook David Tigges - McNair law firm. Have all info on him and his side kick past lottery commissioner crook Paula Bethea.
Crook Terry Finger - Bluffton Town lawyer, being sued for Foia violations.
Crook David Jennings - Charleston Cvb lawyer lied and refused foia laws. Will be sued and needs fast FBI IRS investigation in fraud, IRS Ubit violations.
Crook Brian Hulbert - Hilton Head Town lawyer schemed with Council, Town employees and Gregg Alford new all about tax money theft.
Weston Newton, lawyer -SCPRT involvement tied, to Bill Herbkersman, and crooked HB 3931.
Tom Davis, lawyer -SCPRT involvement, tied to Bill Herbkersman, and crooked HB 3931.
Crook Drew Laughlin - past Hilton Head Mayor refused to audit Bill Miles - allowed Steve Riley to use tax monies to join Chamber, refused to draft Dmo contract, no procurement, no oversight of Atax funds. Had knowledge of the 4 M past welcome center attempted robbery by Bill Miles, Steve Riley and past Mayor.
Crook Josh Gruber - Beaufort County lawyer - used the tax monies to join chambers with Gary Kubic. Refuses to draft Dmo contract and put out Dmo job under procurement laws.
Crook Drew Davis - Beaufort Schools lawyer refuses to volunteer to an audit or show detailed audit.
Crook Trenholm Walker - hired by crook Town lawyer Gregg Alford paid with stolen tax money for a private lawsuit.
Crook John Linton Jr - hired by Gregg Alford paid with stolen tax money and knows this.
Crook Robert "Shep" Guyton, the Myrtle Beach attorney and Chamber Chairman who funneled hundreds of thousands of dollars in campaign donations through more than a dozen corporations in 2009, faces 167 state ethics charges, most stemming from excessive contributions to candidates for local and state offices, according to public records.

The list goes on and on and on!!

Bottom line, every lawyer needs to be questioned by the FBI, IRS, Sled and DOJ that represents the crooks in the largest cities where the most money is involved and being unconstitutionally misused.

The biggest corrupted crooked lawyers on this list are Gregg Alford and David Tigges.

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

I have been given the approval by my supporters to offer a reward for 100k for any info provided that leads to the arrest, conviction and imprisonment of any local Beaufort County official, Chamber employee, School system employee or local lawyer tied to any of this.

On Jan 10, 2018, at 12:58 PM, Philip Branton <zoomru@yahoo.com> wrote:

Skip, Marilyn and all concerned "observers",

Everyone's efforts and concerns and awareness are highly warranted. The informational flow and dynamics at hand goes beyond the scope being described.
It would be most helpful for everyone concerned to think of these chain of events and historical tax dollar accountability issues as it relates to the IRS and tax law and the Security and Exchange Commission.

How do you stop Al Capone in 2018..?

More laws.....sadly, NO.

Think of the issues and accountability verification that taxpayers and ratepayers expect.
Think of the real issues that Bill Miles and Lawyer David Tigges really face. Think of a Borton retirement..?

It's the actual digital mountain of evidence sitting behind certain servers and remote access at the South Carolina Law Enforcement Division (SLED) that is NOT being divulged. Does anyone here really think that SC Senator Tom Davis has a clue or is informed about his own data or anyone else..?

That is the informational leverage being brought to bear.

Pulling the information from the Beaufort County Chamber of Commerce is only one facet. It is only a portion of data needed and questionably verifiable in a court of law due to the lawyers representing both sides of the informational stream.

Stop and consider the information on Hargrave Communication servers serving Beaufort County alone. Now, think of the statewide server network and consider the oversight implications with respect to the Fusion Center data accountability and its Homeland Security dominoes. Mr. Miles and Mr. Tigges have no real clue how their informational goose is already cooked. Corrupt or not.
What do you think will happen when those server records are pulled in support of a class action lawsuit..? The documentation provided will pale in comparison to the data that the NSA will compartmentalize separately from SLED.

That will have seismic results statewide and nationally.

So.....just sit and think....right now as you read this and look at the advertising tracking via yahoo or Comcast or Google or Verizon.

How are these corporate data hives more informed than Tammy Rawl or Mr Keel at SLED about the accounting and oversight and activity of the Beaufort County Chamber of Commerce or the workers in the legal department of the city of Hilton Head Island or Sea Pines..?

It's not scary stuff.....it is just the reality we all live in.

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

How do you think David Pascoe will use information provided by Rick Quinn or Bobby Harrell or Tammy Rawl to verify accountable actions in any county or city across our state..?

Everyone's actions and concerns and class action awareness is more valuable than anyone is really being told.

Thank you all.....

Chris Branton

Sent from Yahoo Mail on Android

On Wed, Jan 10, 2018 at 11:13 AM, Skip Hoagland <shoagland@me.com> wrote:

> I tried the nice method and just talking for 20 yrs and it did not work. My harsh criticism and lawsuits seem to be working and getting more attention. My facts and info also seemed to result in the FBI raid on the Berkeley County SC chamber and School cfo 386k theft. So yes I will stay the course on brash and hard nosed and suggest others do the same. Liars, crooks and thieves of our tax monies will not react to all talk and no action. They will just wait you out until you burn out and go away. Thanks
>
> We must get the Towns involved who secretly used our tax funds to join the chambers and refusing to ask the chambers for access under the non profit corporation act, more corruption. The Packet is a member under past corrupted publisher Sara Borton who is now gone, who censored our local news and harmed this community for 25 yrs.
> The Packet seems to have now ended this censorship and reporting the news we all deserve in the community.
>
> Please get other chamber members involved to support Ryan McAvoy who has sued the Hilton head Chamber for access to its financials for members who are essence owners/ investors/ stakeholders. As expected crook Bill miles and Lawyer David Tigges are fighting him, now trying to say he isn't a member. Like me fighting Foia for tax payers. They must be in great fear and have lots to hide spending thousands of tax monies and members dues to lawyers, using the very money of those to hide info from them. This chamber has even refused the membership of a local lawyer and my self. I ask everyone to join and seek this info under the non profit corporation act laws of SC, we will pay your membership to join in the lawsuit with Ryan McAvoy who had the courage to do this like me with no fear of retaliation. It's all free to you, just need your courage and concern to act. This non profit act will negate the need for Foia and HB 3931 being introduced by crook Bill Herbkersman and others supporters like Weston Newton, Tom Davis. This is the most outrageous crooked corrupted House Bill 3931 I have ever seen. I hope they all end up in Prison.Thanks
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jan 10, 2018, at 9:54 AM, Marilyn Bullard <bullardpiwko@aol.com> wrote:

> Mr. Hoagland:
> While some people consider you brash and hard-nosed, others appreciate your determination.
> Surprisingly Mr. Lauderdale agrees with your assessment of the recent
> proposed Bill H.'s faux transparency bill regarding public funds to private organizations.
> So you are making progress for truth and Transparency.
> While I appreciate the Packets efforts, much more needs to be exposed on the Chamber along with how the feel good description of School Choice is hiding a trend towards White Flight for White Majority Schools in Bluffton, with the Supt and majority school board upping higher classroom capacity in 2016 to accommodate more choice students and now wanting a money referendum to add more classrooms to these schools to encourage more of this choice program. The school district will never admit to this type of racial segregation or that the logistics of this school district cannot provide the same educational choice opportunities for all students.
> Regards,
> Lyn Piwko Bullard
> Sent from my iPhone

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

E-Mail #2

Gmail by Google

Gregg Alford <gregg@alfordlawsc.com>

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

REPLY TO "SNAKE IN THE GRASS"

1 message

Kate McClintic <mccwdc@his.com> Tue, Jan 9, 2018 at 5:05 PM
To: Skip Hoagland <shoagland@me.com>, schsdistrict118@aol.com, rcaporale@bcgov.net, tvaux@bcgov.net, mcovert@bcgov.net, Weston Newton <wnewton@jsplaw.net>, jeffbradley@schouse.gov, tom@senatortomdavis.com, marksanford99@gmail.com, Tim Scott <joe_mckeown@scott.senate.gov>, Alex Kinkaid <akincaid@islandpacket.com>, "Thenerve.org Rick" <rbrundrett@islandpacket.com>, Brian Tolley <btolley@islandpacket.com>, dpascoe@scsolicitor1.org
Cc: tdavis@harveyandbattey.com, Lee@brightagencyinc.com, dtigges@mcnair.net, dparrish@scprt.com, eriggs949@gmail.com, edukes@lcre.com, shellie@blufftonchamberofcommerce.org, bmiles@hiltonheadisland.org, blakelyw@beaufortsc.org, hhill@cacvbmail.com, djennings@rrhlawfirm.com, paula@phbethea.com, mkeel@sled.sc.gov, pgrant@sled.sc.gov, shamm@ethics.sc.gov, AWilson@scag.gov, will.folks@gmail.com, david@myrtlebeachsc.com, cscoppe@thestate.com, mcavoylegend@gmail.com, rdeal@hiltonheadisland.org, rwarco@websterrogers.com, bcreech@websterrogers.com, davidb@hiltonheadislandsc.gov, billyk@islc.net, tecklenburgj@charleston-sc.gov, bensch@hargray.com, psommerville@bcgov.net, amesco@earthlink.net, gringoviejotwo@yahoo.com, John Dowling <dowlingjohn287@gmail.com>, John Crangle <johncrangle2@gmail.com>, Jay Bender <jbender@brblegal.com>, ted.pitts@scchamber.net, dan.hunt@blufftontoday.com, Stephen Fastenau <sfastenau@islandpacket.com>, Lucas High <lhigh@islandpacket.com>, pbrowning@postandcourier.com, Don Brashears <Tmbdab@aol.com>, Joe Iaco <jiaco@bellsouth.net>, peter@mediafeedia.com, josh metnick <josh@chicago.com>, Art Davis <art@globallylocally.com>, joseph.dunkle@beaufort.k12.sc.us, School Board <bisi@roadrunner.com>, eyelandart@yahoo.com, earl.campbell@beaufort.k12.sc.us, Ted Huffman <tkhuffman1@gmail.com>, Dan Wood <dwood@townofbluffton.com>, Fred Hamilton <fhamilton@townofbluffton.com>, Harry Lutz <hlutz@townofbluffton.com>, Larry Toomers <ltoomer@townofbluffton.com>, Scott Marshall <smarshall@townofbluffton.com>, Shirley Freeman <sfreeman@townofbluffton.com>, Marc Frey <mfrey@freymedia.com>, MarcG@hiltonheadislandsc.gov, morlando@townofbluffton.com, Terry Finger <tfinger@fingerlaw.com>, gregg@alfordlawsc.com, brianh@hiltonheadislandsc.gov, sturodman@aol.com, Jerry Stewart <jstewart@bcgov.net>, nfelix@mcnair.net, Joe Duboise <zach@lowcountrylegal.com>, Mare Deckard <maremailmmm@yahoo.com>, hhill@explorecharleston.com, Bill Rogers <brogers@scpress.org>, Steven Baer <steve181@roadrunner.com>, Riley Steve <stever@hiltonheadislandsc.gov>, David Hucks <david@myrtle-beach.com>, "Thenerve.org Rick" <rbrundrett@greenvillenews.com>, Kristina Wetzel <helodiva@gmail.com>, trishaculligan@yahoo.com, psomerville@bcgov.net, Larry Meyers <meyersteamrealty@gmail.com>, David Williams <dwilliams@sled.sc.gov>, David Lauderdale <letters@islandpacket.com>, Roberts Vaux <roberts.vaux@vmblawfirm.com>, Jeremia Froyland <jeremiafroyland@gmail.com>, John Keener <john@charlestoncrabhouse.com>, John Munro <JMunro@seapines.com>, Steve Birdwell <sbirdwell@seapines.com>, gerard mahieu <gerardmahieu@aol.com>, bhaley@hhivacations.com, dale augustine <dalehhi@hotmail.com>, Brad Marra <bmarra@palmettodunes.com>, Trish Heichel <trilar3@aol.com>, stewartbrown@yahoo.com, Joe Duboise <joe@lowcountrylegal.com>, Joe And Chris Joe And Chris <cjpvap01@aol.com>, Joe And Chris Joe And Chris <cjp@whistleblowersagainstfraud.com>, Dean Zerbe <dzerbe@zffjlaw.com>, JSTenenbaum@venable.com, Lev Glikman <lev.glikman@irs.gov>, dpascoe@scsolicitor1.org, Taylor@harrisonfirm.com, jwiendl@sonesta.com, Glenn Smith <gsmith@postandcourier.com>

Dear Skip,

I'm behind you all the way! The public has no idea how corrupt and incestuous the legal system is—attorneys *and* judges--not only in Beaufort, but across the country. Why? Because their self-serving greed is insulated by layer upon layer of fraternal colleagues who enable and maintain the profession's ability to "self-police" itself. Hah! State attorney and judicial disciplinary commissions are a joke! In Washington, DC, the DC Commission on Judicial Disability and Tenure received over 600 complaints about DC Court judges from litigants, relatives, and attorneys from 2007 to 2014. Most were "dismissed" without investigation and only *one* resulted in "formal disciplinary proceedings." Is this remotely credible? They are currently under investigation by the Department of Justice.

If you have a problem with an attorney or judge (who can be remarkably overt and smug in their abuse of legal practices and procedures) your only choice is to plod through the same system by hiring another lawyer who is just as prone to immediately confer with opposing counsel about the desired results as his

predecessor. This is just standard practice. The pie, which the clients and taxpayers pay for, is sliced up behind closed doors.

In my Beaufort Probate Court experience, the trial judge failed to admit my "smoking gun" evidentiary exhibits. Then, when I sought to appeal in a hearing where opposing counsel *failed to appear*, the Beaufort Master-in-Equity conducted the hearing *over his cell-phone* while opposing counsel sat in his car! My sister had driven all the way from DC for this hearing. Appeal denied.

In another legal matter here in Beaufort, a local attorney acted against my stated objectives and impacted me deleteriously. Then he pocketed the full retainer! These lawyers and judges do this because--like all bullies—they know they can! Our legal system, with its adversarial system, has become weaponized—where the lawyers and the judges control the weapons—on a tilted playing field! They've got our country by the balls.

I believe the sordid state of our legal system has been one of the major contributors to the current culture of institutional, corporate, and political corruption and exploitation that has alienated so many American citizens. If a nation can't trust its own legal system, then who is the adult in the room? The result is that private citizens, like yourself, must take matters into their own hands. It's a David and Goliath issue, but with the help of the media's intensified investigative assistance, more Davids are succeeding at exposing abuse. It's been slow but just look at how much progress you've made. *There will be,* as we have seen with the Time's Up movement, the straw that breaks the camel's back!

I will forward this on to Marty Baron at the Washington Post and Chuck Lewis at the Center for Investigative Reporting.

Kate McClintic

Beaufort, SC

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

From: Skip Hoagland [mailto:shoagland@me.com]
Sent: Tuesday, January 9, 2018 3:09 PM
To: schsdistrict118@aol.com; rcaporale@bcgov.net; tvaux@bcgov.net; mcovert@bcgov.net; Weston Newton <wnewton@jsplaw.net>; jeffbradley@schouse.gov; tom@senatortomdavis.com; marksanford99@gmail.com; Tim Scott <joe_mckeown@scott.senate.gov>; Alex Kinkaid <akincaid@islandpacket.com>; Thenerve.org Rick <rbrundrett@islandpacket.com>; Brian Tolley <btolley@islandpacket.com>; dpascoe@scsolicitor1.org
Cc: tdavis@harveyandbattey.com; Lee@brightagencyinc.com; dtigges@mcnair.net; dparrish@scprt.com; eriggs949@gmail.com; edukes@lcre.com; shellie@blufftonchamberofcommerce.org; bmiles@hiltonheadisland.org; blakelyw@beaufortsc.org; hhill@cacvbmail.com; djennings@rrhlawfirm.com; paula@phbethea.com; mkeel@sled.sc.gov; pgrant@sled.sc.gov; shamm@ethics.sc.gov; AWilson@scag.gov; will.folks@gmail.com; david@myrtlebeachsc.com; cscoppe@thestate.com; mcavoylegend@gmail.com; rdeal@hiltonheadisland.org; rwarco@websterrogers.com; bcreech@websterrogers.com; davidb@hiltonheadislandsc.gov; billyk@islc.net; tecklenburgj@charleston-sc.gov; bensch@hargray.com; psommerville@bcgov.net; amesco@earthlink.net; gringoviejotwo@yahoo.com; John Dowling <dowlingjohn287@gmail.com>; John Crangle <johncrangle2@gmail.com>; Jay Bender <jbender@brblegal.com>; ted.pitts@scchamber.net; dan.hunt@blufftontoday.com; Stephen Fastenau <sfastenau@islandpacket.com>; Lucas High <lhigh@islandpacket.com>; pbrowning@postandcourier.com; Don Brashears <Tmbdab@aol.com>; Joe Iaco <jiaco@bellsouth.net>; peter@mediafeedia.com; josh metnick <josh@chicago.com>; Art Davis <art@globallylocally.com>; joseph.dunkle@beaufort.k12.sc.us; School Board <bisi@roadrunner.com>; eyelandart@yahoo.com;

earl.campbell@beaufort.k12.sc.us; Ted Huffman <tkhuffman1@gmail.com>; Dan Wood <dwood@townofbluffton.com>; Fred Hamilton <fhamilton@townofbluffton.com>; Harry Lutz <hlutz@townofbluffton.com>; Larry Toomers <ltoomer@townofbluffton.com>; Scott Marshall <smarshall@townofbluffton.com>; Shirley Freeman <sfreeman@townofbluffton.com>; Marc Frey <mfrey@freymedia.com>; MarcG@hiltonheadislandsc.gov; morlando@townofbluffton.com; Terry Finger <tfinger@fingerlaw.com>; gregg@alfordlawsc.com; brianh@hiltonheadislandsc.gov; sturodman@aol.com; Jerry Stewart <jstewart@bcgov.net>; nfelix@mcnair.net; Joe Duboise <zach@lowcountrylegal.com>; Mari Deckard <maremailmmm@yahoo.com>; hhill@explorecharleston.com; Bill Rogers <brogers@scpress.org>; Steven Baer <steve181@roadrunner.com>; Riley Steve <stever@hiltonheadislandsc.gov>; David Hucks <david@myrtle-beach.com>; Thenerve.org Rick <rbrundrett@greenvillenews.com>; Kristina Wetzel <helodiva@gmail.com>; trishaculligan@yahoo.com; psomerville@bcgov.net; Larry Meyers <meyersteamrealty@gmail.com>; Kate McClintic <mccwdc@his.com>; David Williams <dwilliams@sled.sc.gov>; David Lauderdale <letters@islandpacket.com>; Roberts Vaux <roberts.vaux@vmblawfirm.com>; Jeremia Froyland <jeremiafroyland@gmail.com>; John Keener <john@charlestoncrabhouse.com>; John Munro <JMunro@seapines.com>; Steve Birdwell <sbirdwell@seapines.com>; gerard mahieu <gerardmahieu@aol.com>; bhaley@hhivacations.com; dale augustine <dalehhi@hotmail.com>; Brad Marra <bmarra@palmettodunes.com>; Trish Heichel <trilar3@aol.com>; stewartbrown@yahoo.com; Joe Duboise <joe@lowcountrylegal.com>; Joe And Chris Joe And Chris <cjpvap01@aol.com>; Joe And Chris Joe And Chris <cjp@whistleblowersagainstfraud.com>; Dean Zerbe <dzerbe@zffjlaw.com>; JSTenenbaum@Venable.com; Lev Glikman <lev.glikman@irs.gov>; dpascoe@scsolicitor1.org; Taylor@harrisonfirm.com; jwiendl@sonesta.com; Glenn Smith <gsmith@postandcourier.com>
Subject: Re: There is a Snake in the grass- House Bill 3931–recent FBI raid on Berkeley SC Chamber tip of iceberg

Just posted
http://www.islandpacket.com/opinion/opn-columns-blogs/david-lauderdale/article193727859.html

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland

US cell 843-384-7260

Buenos Aires , Argentina

011-54-9-11-5942-3202

On Jan 9, 2018, at 2:59 PM, Skip Hoagland <shoagland@me.com> wrote:

> Representative Bill Herbkersman is a corrupted crook and a puppet for those in fear of transparency. This all needs deep ongoing investigations by FBI, IRS, Sled, AG, DOJ and David Pascoe since both Jim Merrill and now Weston Newton
>
> Involved !!!!!!!
>
> Read all below. As you all can see, more than meets the eye. Now we find out; not just crook and criminal Jim Merrill was on this committee with crook Bill Herbkersman, but now Weston Newton. Weston is the Chairman of the SC House Legislative Committee and on the subcommittee for SCPRT. We found out Weston Newton is related to lawyer Wes Jones and Ed Dukes on Beaufort chamber board who voted to kick me out of this chamber for asking for access to the chamber financials and labeled me a trouble maker. Also related to Judge Dukes, who I forced to recuse himself off my Kim Likin Likins case for me being sued by her as a Town council member for her private frivolous lawsuit against me for speaking the truth. Gregg Alford and Steve Riley and all council members conspired and schemed this lawsuit to damage me. This theft and unconstitutional misuse of 200k in public tax funds for her private job is and was illegal and a crime. We find out Judge Dukes communicated with his brother Ed Dukes about me and is also friends with crook Hilton Head lawyer Gregg Alford. Find our Judge Dukes is related to Weston Newton, Wes jones as well. This is the beginning of the incestuos tangled web of corruption against me.
>
> Not only is the Town Lawyer Gregg Alford part of the 200K theft, he is also in violation of his Town lawyer contract profiting from this stolen 200k in tax monies. He attempted to call this a Town loan to Kim Likins, no interest, no

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

collateral and no time limit to pay it back. All a crime and illegal. FBI IRS Sled etc must get involved. This was income to Kim linkins and she did not pay income taxes on this? Imagine how criminal this is, stealing tax monies for private purposes. I did not know we had the Town bank of Hilton Head just for crooked lying Town Lawyers, Town managers and Town council to use????

Further, crook lawyer Gregg Alford is friends with Judge Dukes and Judge Dukes approved a gag order against me, fined me $4500 to go into his pocket and Kim Likins. This gag order is a scam /sham and complete violation of my federal free speech rights under the First Amendment. This all could not be any more crooked and also needs to be investigated by the FBI. Here is Weston Newton and Bill Herbkersman tied to SC prt funding and corruption with zero oversight http://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyPHPFiles/ParksRecreationandTourism.php

Town councils, Chamber Boards, School Boards, most lawyers and many Town employees are simply not trained or knowledgeable enough to be in charge of full transparency of our tax funds. This is why independent CPAs must be involved. The following links below will provide all the info you need to enforce transparency with our tax monies and how to set up independent FACs (Forensic Audit Committees) in every city in SC. Without independent audits the crooks will keep stealing and misusing tens of millions of our tax monies in total darkness.

Bill Herbkersman, Rick Caporale, Mike Covert, Tabor Vaux and many others are simply over their heads, or have been corrupted. No one in their right mind, with their own money invested, or in charge of our tax funds would think just trusting someone like Jeff Moss, Bill Miles and their hired cookie cutter financial audits is sufficient oversight.

First, Mr Herbkersman, explain and debate this: Rick, you,Tabor Vaux, Mike Covert chime in. Do you really think you are more knowledgeable than Bill Rogers of the SC press association and leading Foia expert in SC Lawyer Jay Bender? If they tell you this B 3931 is a trick by Bill Herbkersman to infact allow avoidance to full Foia, that is a fact. Who are we to trust ????

http://www.islandpacket.com/opinion/letters-to-the-editor/article193228049.html

Mr Herbkersman said in today's article.***"he (has not spoken) with the Hilton Head Island-Bluffton Chamber of Commerce regarding the filing of the bill."***

Given in 2015 Herbkersman was awarded the "*Bluffton Regional Business Council Person of the Year*" by the Hilton Head Island / Bluffton Chamber of Commerce (copy attached), it is a little hard to believe there has not been any discussion as to how this Chamber and others will benefit from this bill.

This is perhaps the tie-in to the largest corruption in the history of SC. Bill Herbkersman and Weston Newton and all their chamber buddies connected, they will have a lot to answer to when the FBI comes knocking on their door. The information and research I will provide will result in prison for many. The massive insanity must end.

http://www.islandpacket.com/news/politics-government/article193575919.html

Mr. Herbkersman, again are we to accept you and all our Town council members are smarter than Bill Rogers, the head of the SC press association and Jay Bender, the states leading lawyer and authority on SC Foia laws and lawyer Taylor Smith, an expert on SC non-profit corporation act laws and State procurement laws? Mr Herbkersman, what makes you an expert on Destination Marketing, audits, Foia, proper use of Atax funds and all the rest? What are you going to do about these same chambers even refusing access to its own members like the Island Packet, Town of Hilton head, Town of Beaufort and Town of Bluffton who all stole and misused our tax monies to become Town members and then council members attended a Chamber Ball party to wine and dine on tax payers dime? Who is a member/ owner of the chambers Town council members or all tax payers whose money was used ? What gave Steve Riley, Gary Kubic and Marc Orlando to secretly join the private corporation Chambers with public funds ? And not join or support any other local organizations? How do you do this and fund this chamber with millions and not be in major conflicts ?

Bill, you have clearly been used as a puppet for those who are in fear and want to escape Foia's, audits and transparency. I have bad news for you and the crooks you represent, and good news for me and other honest taxpayers. The FBI / IRS / DOJ could care less about you or any crooked corrupted introduction of HB 3931. What I can't wait for is when we find out who is behind this with you. I have a pretty good idea who and I have made sure law enforcement does as well. You, Weston Newton and others talk a good game, but reality is you are either totally corrupted, or worse incompetent. It's your actions that speak volumes not your empty corrupted crooked words.

I want to say thanks to anyone who takes their valuable time (right or wrong) to respond on this very serious issue that involves millions of unconstitutional misuse of tax funds, improper reporting and violations than most people, including elected officials, lawyers don't realize, or again are not trained to catch or understand. I have been studying much of this for 30 yrs. I like Lawyer Jay Bender consider myself and our team a leading expert on the proper function of chambers, CVBS and city Dmos and proper use of tax monies. Add Irs Ubit, Procurement laws, Foia, non profit corporation act laws.

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

To stop all the "he said, she said", and continuing my personal attacks on individuals, whom I know are corrupt, I want to prove this by making sure we force proper oversight under current laws. I also want to insure that investigations are done and complete, on all those we have identified committing wrong doing. Most important prosecution under the full extent of the law. Ignorance no excuse.

I will lay out below what this HB3931 has cleverly, intentionally and incompetently not included. Others like Mr Rogers, and the lawyers use nicer words to explain all this corruption, I'd rather call it what it is. If you don't tell the truth you are a liar, if you intentionally calculated the misuse of tax funds, your are a thief.

The simple explanation for how we assure full transparency is everyone who controls, receives and spends Atax or general tax funds, must first fully comply to SC Foia and non-profit corporation act laws. If we receive the information and it's incomplete we have the right to force total financial information and transparency, not just what the crooks want you to see,,and also have the right to fully audit the audit of the audit. In other words no loop holes or escape from a crooked corrupted HB 3931 introduced by crooked corrupted Rep Bill Herbkersman in behalf of his crooked corrupted buddies. Perhaps Mr Herbkersman would like to publicly debate this with experts ?

Everyone who receives tax funds must sign a contract with those officials issuing the funds. They must abide by proper terms and conditions in the contract to receive these funds. Such as Foia, non profit corporation act laws, IRS Ubit, rights of tax payers to receive any info they request, independent audits and forensic audits etc.

If they are not willing to comply and sign a contract, they get zero tax money. HB 3931 has nothing about contracts I can see ? In fact, if they are currently receiving tax funds and refuse to sign a properly drafted agreement they get defunded. I see nothing in HB 3931 about state and federal violations like Irs Ubit, non profit act, non profits can not use tax money for private profit purposes and can not use tax monies to unfairly compete in any business against tax paying companies, 501-c6 Irs tax codes are clear on this. A non profit can not be in any business normally carried on by a for profit company and if they do, they stand to lose their non profit tax status.

These contracts unlike the highly corrupted Hilton Head Chamber Dmo contract, drafted by crooks, thieves and liars, must be done properly and independently. We will not and can not let the crooks like Lawyer David Tigges draft and control the drafting of their own contracts or hire their own cookie cutter audits or forensic audits. Do these crooks really think we are all that stupid and are just going to allow this insanity and robbery of millions to continue without a fight to clean it up??

Next, we need a HB 3931 that makes it mandatory that independent forensic audits are done at minimum every 3-5 yrs on everyone who touches our tax money from top to bottom, and after this every year in between a general financial audit, also done independently. This is the true Reagan Principal not the crook SC Bill Herbkersman version and his crooked buddies.

Where the big problem lies, is the people who control and issue our tax funds in our state, to state entities, non-profit entities and all institutions have allowed many crooks to escape full transparency and oversight for 100 yrs. This has been a result of either corruption or incompetence. Either way it has allowed for massive unconstitutional misuse, abuse, overcharging and theft of our hard earned tax funds in the tens of millions. These officials work for us the tax payer, we do not work for them. They were elected and hired to approve, spend and protect our tax funds like their own, and they have mostly failed us and broken their campaign promises to us. I consider this lies and fraud.

Our corrupted majority elected officials have also allowed those who receive our tax funds to avoid and escape many SC laws, like unconstitutional misuse of our tax funds, Violations to Irs Ubit laws and Irs tax codes governing 501-c3 and C6 non profits. Recently in Berkeley SC and other states like Florida Palm Beach Cvb, once their so-called hired independent audits were challenged and forensically audited by local authorities, FBI, they were discovered committing fraud, theft, embezzlement, credit card misuse etc. In other words Bill, Mike, Tabor, Rick, and all the rest of you who sit on Town councils, including all our Mayors and Town lawyers, it has been fully proven and confirmed once hired cookie cutter audits are forced to undergo a forensic audit, it's 100% authorities will discover wrong doing, and many result in prison sentences. With all the proof I have submitted to law enforcement, is there anyone on this email that believes no wrong doing will be found on other chambers and school districts, once a forensic audit or FBI investigation is launched, like just happen in Berkeley on the Chamber and School CFO theft of 386k ? Bill Miles, Jeff Moss, Helen Hill, Brad Dean, Blakely Williams and many connected to these SC chambers and school districts must open their books fully, not partially and council accepting their hired cookie cutter audits must end. ""Read Links Below""

Rick, correct me if I am wrong, but you, Tabor Vaux and Mike Covert, all voted against a forensic audit on Jeff Moss, as you felt it implied wrong doing. Forensic audits were designed to make sure and confirm there is no wrongdoing to regain full trust and a Reagan Principal - Trust but Verified. Further, if any recipients of millions of tax funds like Jeff Moss or Bill Miles refuses to even volunteer to comply to a forensic audit, this only means they have something to hide. I have asked them all to volunteer if they had nothing to hide, they refused. Have you asked??? Note never in the history of the entire USA has anyone who refused to undergo a forensic audit and then forced escaped wrong doing and most of the time prison. What does this tell you??????????????

If you all oversee your own money this way, I am surpris[illegible]you are all not bankrupt.

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Rep Herbkersman, you said you canceled this B 3931 months ago, that email from you below, why would you even introduce B 3931 again, who is behind this corruption with you? You certainly understand corrupt or not corrupt, if we had honest officials to force compliance to existing state and federal laws we could accomplish full transparency ? If you want to introduce a House Bill, introduce one that would force all state agencies/ institutions and non-profit Chambers / CVBS and city Dmos and others who receive hundreds of millions of general tax funds and Atax monies, to all be forensically audited by an independent Fac (Forensic Audit Committee) made up of local volunteer and hired CPAs. This will clean the slate under Reagan Principal and thereafter financially audited independently every year, no more hired audits. Again It must be mandatory to undergo forensic audits every 3-5 years min. Again, Rick / Bill / Tabor / Mike, this is not about just trust, it's about Trust Verified. Agreed ? The contracts, every person receiving tax monies must sign, would include all this.

You all have been just handing millions in Atax funds with no contracts or oversight for many years. The corruption is just so imbedded and never been challenged before. Again, follow the Berkeley case and be fully prepared to answer questions to others in the future, not me since I have no official authority. I will just provide the info for others to use, and file as many lawsuits as I can to help end all this corruption to tax payers and many others.

All my contracts when I was in business before I retired, was drafted to "keep good people good, keep good people from going bad and force bad people to be good"

The contract our lying crooked and corrupted Hilton Head Town Council / Steve Riley majority allowed, was by design to allow "bad people to continue to be bad".

This will be front page headlines perhaps one day, now our corrupted publisher Sara Borton of the Island Packet is gone. She censored our local news and harmed our community for 25 yrs in favor of local crooked corrupted friends and big advertisers. That's a fact!! I am sure we will now get a new publisher and leadership willing to report the good, bad and ugly. Every community deserves local uncensored reporting and news. We have great local journalist who deserve the chance to do their investigative reporting job.

Again, we must force compliance to the laws we already have in SC immediately. We must try to prevent crooked lawyers like David Tigges and corrupted state politicians to attempt or successfully corrupt even judges. This is why I lean towards FBI Irs who are immune from state corruption and fear of losing their jobs.

Further, in the recent FBI case against the Berkeley County SC Chamber and 386k theft discovery by the School CFO, under HB3931 this would have never been discovered. This FBI raid should send a loud clear message to everyone, including all Beaufort county council members, all elected officials in the state, that regardless of any existing laws, HB 3931, when the FBI gets involved is not needed and meaningless. Berkeley County SC, is the first FBI raid and forensic audit on these two institutions (Chamber and School district) in the 200 yr history of SC and both resulted in crimes. What does this tell you will happen, when the other city institutions run by proven incestuos corruption, go through the same level of full transparency and inspection?

We need to focus on forcing the largest recipients of tax monies that are all currently proven to be in violations and under suspicion, to open their accounting to full inspection. They have all proven to be committing many violations including:

*IRS Ubit

*Unconstitutionally misusing tax monies for private use and profit

*Committing fraud and refusing Foia and non-profit corporation act laws

*Violation to procurement laws and first Amendment violations

*Unfair competitive practices and outright premeditated theft of thousands of tax funds

*Approving over payments for 100k apps, money to Canada attempted 340k theft for same app that cost less than 30k. Atax told Council don't do it and they did?

*4 million Welcome Centerattempted robbery and 125k in Welcome Center design fees.

*Secret 150 k tax payments to chamber for hurricane Irma by Steve Riley

*Secret hiring of lawyer David Tigges for Steve Riley, also Bill miles Lawyer ??

*1M in funds handed to Bill Miles for some property tied to the town and Welcome center?

*Steve Riley using our general tax funds to join the Hilton Head Chamber for council to be members ? Extreme theft and misuse of tax funds ? Who is a member All tax payers or just Town council ? Town council attends Chamber Ball to wine and dine on tax payers dime? David Tigges lied and said this was the Chamber annual meeting ? No elections for members to serve with term limits, All appointed buddies with no term limits. No

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

opportunity for other members unless they are willing to be silenced by David Tigges and Bill miles to let the corruption and theft continue.

*Steve Riley, David Tigges and Gregg Alford secret drafting of the chamber Dmo contract, help from lying crooked Town council members Harkins, Lennox and Mccaan.

*Town lawyer Gregg Alford non-compliance to procurement laws being protected and allowed to be Town lawyer for over 14 yrs and receiving over 4 m in legal fees, eliminating opportunity to other local lawyers for this job. We now find out the lawyer Gregg Alford is in violation of his Town contract representing council member Kim Likins individually , versus the entire town council body, and worse was instrumental in the 200k theft of tax monies to fund a private lawsuit for a council Member Kim Likins private sector job, and charged legal fees even worse to profit his private pocket. This is all illegal and criminal..

This is just what I have discovered, imagine what law enforcement will discover.

Again, we must also investigate deeply the heads of the state agencies issuing these funds like Duane Parrish SC PRT, Ed Riggs SC TERC, and now find out the PRT Committee members Rep Bill Herbkersman introducing this B 3931 who sat on this committee with crook Jim Merrill, yes tired to embezzlement with Charleston Cvb head, crook Helen Hill and her lying crook lawyer David Jennings of Rosen Law firm. SC Terc (the expenditure and review committee) failed us in any oversight of Atax funds statewide, by their own admission. Imagine Ed Riggs and Duane Parrish both involved, sit on Cvb board of Helen Hill, the head thief of Atax funds and SC PRT matching funds. Duane parrish used to work for Crook Helen Hill and reported Helen hill got Duane Parrish this SC prt job ?????

In fact, the wrong doing discovered from an investigation on all this will prove to be shocking. The corruption touches the highest levels of our state and seems even our own Governor and Attorney General and again why I favor dealing with the federal agencies FBI ,Irs , Doj.

Our focus and forensic audits to begin on the following:

1. Bill Miles / Hilton Head Chamber toss in David Tigges McNair and Paula Bethea past lottery commissioner

2. Jeff Moss, Superintendent of Beaufort County schools

3. Helen Hill, Charleston Cvb

4. Brad Dean, Myrtle Beach Chamber

5. SC PRT Duane Parrish—Bill Herbkersman and other committee members like Jim Merrill. Helen Hill Charleston Cvb and others connected

5. SC TERC, Ed Riggs Chairman connected to PRT and Charleston Cvb.

6. Beaufort Chamber— Blakely Williams

7. Town manager of Hilton Head Steve Riley, Town lawyers and Town Council members questioned.

8. Beaufort County Town Manager, Town lawyers and Town Council

9. Town of Bluffton Town Manager, Town lawyer and its crooked Mayor

10. SC Chamber —Ted Pitts, Otis Rawl and Sunny Phillips.

11. Next, all the School districts, Chambers, CVBS and city Dmo's in the entire state.

12. All the audit firms involved that were hired by the heads of these institutions questioned and replaced. This will prove to be shocking to many as well. Our research has already identified they seem to be over looking intentionally the misusing of tax funds to commit wrongdoing, Irs Ubit laws, etc. All auditors like JW Hunt Company former employee Bobby Creech, also seems did other Chamber Cvb city Dmo audits in the state ?? He now works for Ray Warco on Hilton Head, Bill Miles' accountant??? internal controllers like Ray Deal at Hilton Head Chamber ?? and accountants hired by the Chambers CVBS city Dmos like Ray Warco of audit firm Webster Rogers ?? They all just turn their heads and just took the payments, salaries and orders from Bill Miles for the cookie cutter financial audits not designed to catch any wrongdoing, escape IRS Ubit or other state and federal violations.

Once these first few investigations and forensic audits by the FBI are completed on Berkeley County Chamber and School CFO theft, and the various forms of wrongdoing and corruption are identified, we can all use this knowledge for the other SC cities. Many of the crimes and violations will be similar.

Berkeley SC FBI Cases will be great and helpful, but we have much bigger violators in this state, with much more theft and misuse of tax monies in the bigger tourist markets and Cities. Hilton Head Chamber Cvb city Dmo, Charleston Cvb city Dmo and Myrtle Beach Chamber are the big 3. Each school system exceeds and involves 200-

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

300m in tax monies, and Chambers 2-10 million plus. Not one of these has had a contract, oversight by the state and local officials, no contract, no independent audits or forensic audits in 100 yrs.

Is there anyone who thinks all is ok and we should just leave it like it is for another 100 yrs??

Rick / Mike / Tabor and Bill, read the ""links below"" to fully understand what proper transparency is all about, and why it is needed, and why your understanding is simply not correct and misguided. The days of good ole boy and gal back slapping, and just saying you trust someone is over.

All of you need to act the same way as you do with your own money. Agreed? Again you were elected as public servants to approve, spend and protect our tax monies like your own, correct? Do you feel you have complied to this campaign promise you all made? Let me be clear, you have not and in fact lied to us and committed fraud by saying you have or would? Seems many council members ownership of timeshares will get interest as well ?

Again If you acted with your own money like you are acting with Tax money, I again can only assume you are broke or headed in that direction, or your wives/ husband control the money in your household. Any House Bill 3931 or any other bill that does not include all this true transparency, not a corrupted SC version of transparency is worthless, and simply trying to trick and allow crooks to escape full transparency and continue to misuse and steal tens of millions of our pubic tax funds.

The following below is written by a Doctor of Education, certainly none of you are going to debate this or again Lawyer Jay Bender leading SC Foia authority? Rep Herbkersman are you a CPA ? If you are this would make you even more crooked then you are.

In Palm Beach, when the Cvb and city Dmo Chamber hired audit was forced to do a forensic audit,it revealed that weak internal controls, combined with "gross mismanagement," made it possible for the Controller to forge 222 separate checks, payable to herself, over a three-year period, without being detected. The 46-page document details 34 findings and 75 recommendations. Findings include: reports of public funds being co-mingled with private funds, $750,000 in withholding taxes not being paid to the IRS and varied conflicts of interest. Overall, lax internal controls and the management environment contributed to the weakness in the operational structure.

School districts: In order for school boards and their employees to protect, maximize and monitor school resources with due diligence, it is essential that all school operations and practices be reviewed and analyzed independently and constantly. The most effective way to begin and maintain such a process is to form a community-based Forensic Auditing Committee (FAC). One of its primary tasks would be to ask critical questions of the school board. The reason for asking the questions is to determine quickly and easily whether board policies and school practices are protecting and maximizing school resources effectively, efficiently and ethically and that they are free from the ravishes of potential or actual corruption. Fortunately, a trend toward the establishment of groups akin to forensic auditing committees (FACs) seems to be gaining momentum. School officials in Mesa, Arizona, have proposed creating a public school audit committee that would "independently review the district's books." Unlike audit committees formed by neighboring school districts, "Mesa's committee would be composed entirely of community volunteers with expertise in accounting and education." (Arizona Republic August 6, 2006) Also, the Arizona Tucson Unified School District's governing board is seeking people to join an audit committee to strengthen the school district's internal financial controls. (Arizona Daily Star, August 3, 2007)

The reality is that some degree of corruption is likely to be found in most school districts. However, it takes critical questioning and diligent forensic review and analysis to determine whether corrupt acts have taken place, are taking place, or could be committed with relative ease. In this regard, it is vital to understand what is meant by the term "corruption":

"breach of trust, bribery, crime, crookedness, deceit, deception, dishonesty, exploitation, evil, extortion, fraud, graft, malfeasance, nepotism, payoff, profiteering, tainted, unethical, untrustworthy and unscrupulousness"

Typically, boards will be defensive and deny that corruption is a malignant and institutionalized problem and will provide a reason that should never be accepted: school accounts are audited regularly so there is no reason to be concerned about or suspect any wrongdoing. Although it appears to be a very credible answer, it does not withstand verification because routine school audits are not designed to uncover the three categories of corruption: cheating and deceit, waste and mismanagement, or even fraud and stealing.

If the audit were conducted with generally accepted auditing standards (GAAS) -- and therefore incorporated Standard #99 (Consideration of Fraud in Financial Statement Audits) -- it still would not identify waste and mismanagement issues or cheating and deceitful practices.

The two major problems facing taxpayer advocates are (1) how to discover if there is school corruption and, if so, (2) how to prove corruption to the public. Only when corruption can be proven will practices and procedures be put into place to limit its cancerous impact on resources. This manual will provide the information, tools, and techniques that will assist taxpayer advocates in this critical endeavor.

https://www.yankeeinstitute.org/wp-content/uploads/2015/07/Ending-Corruption-and-Waste-In-Your-Public-School.pdf

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

https://www.mypalmbeachclerk.com/uploadedFiles/Public_Funds/cvb_audit_report.pdf

https://www.mypalmbeachclerk.com/uploadedFiles/Publications/Alerts/alert_dec06_auditor.pdf

Thanks

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland

US cell 843-384-7260

Buenos Aires , Argentina

011-54-9-11-5942-3202

On Jan 7, 2018, at 10:31 AM, schsdistrict118@aol.com wrote:

> Rick,
>
> Thanks for the comments and I agree. The genesis of the legislation is for even the small entities that get public money although I believe any entity that receives public funds should comply. I also agree an accountant could better the bill and that's the beauty of the sub-committee hearing system we both utilize.
>
> In my sub- committee we put items in the PRT budget such as Fort Thickety, Mitchelville etc. that are part of this great states tourism but the grants are so small that compliance costs would outweigh the grants if were not on a standard format.
>
> I think the granting entity, whether it be county council, the state or a municipality could and should standardize the reporting to avoid loopholes and for proof that the funds are properly and specifically spent. If there is no report from the receiving entity there is no funding from the granting body.
>
> I appreciate your comments and guidance and look forward to comments from any interested party.
>
> Happy new year to you and your's as well, and thanks for all you do.
>
> Bill
>
> -----Original Message-----
> From: Caporale, Rick <rcaporale@bcgov.net>
> To: schsdistrict118 <schsdistrict118@aol.com>; skiphoagland <skiphoagland@yahoo.com>; wnewton <wnewton@jsplaw.net>; tdavis <tdavis@harveyandbattey.com>; marksanford99 <marksanford99@gmail.com>; Lee <Lee@brightagencyinc.com>; dtigges <dtigges@mcnair.net>; dparrish <dparrish@scprt.com>; eriggs949 <eriggs949@gmail.com>; edukes

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

<edukes@lcre.com>; shellie <shellie@blufftonchamberofcommerce.org>; bmiles <bmiles@hiltonheadisland.org>; blakelyw <blakelyw@beaufortsc.org>; hhill <hhill@cacvbmail.com>; djennings <djennings@rrhlawfirm.com>; paula <paula@phbethea.com>
Cc: mkeel <mkeel@sled.sc.gov>; pgrant <pgrant@sled.sc.gov>; shamm <shamm@ethics.sc.gov>; AWilson <AWilson@scag.gov>; dpascoe <dpascoe@scsolicitor1.org>; will.folks <will.folks@gmail.com>; david <david@myrtlebeachsc.com>; rbrundrett <rbrundrett@islandpacket.com>; cscoppe <cscoppe@thestate.com>; mcavoylegend <mcavoylegend@gmail.com>; rdeal <rdeal@hiltonheadisland.org>; rwarco <rwarco@websterrogers.com>; bcreech <bcreech@websterrogers.com>; davidb <davidb@hiltonheadislandsc.gov>; billyk <billyk@islc.net>; tecklenburgj <tecklenburgj@charleston-sc.gov>; bensch <bensch@hargray.com>; Sommerville, Paul <psommerville@bcgov.net>; amesco <amesco@earthlink.net>
Sent: Sun, Jan 7, 2018 10:35 am
Subject: RE: There is a Snake in the grass- House Bill 3931–recent FBI raid on Berkeley SC Chamber tip of iceberg

Bill:

Thank you for taking the time to respond and for inviting comments from folks on this thread. I have followed this FOIA case closely and watched the video of the oral arguments before the SC Supreme Court, both of which, I thought, were poorly framed and executed, especially the presentation by the Chamber's lawyer.

In any event, my comment is we need to know in advance what level of detail would be required to satisfy the mandate of the proposed legislation. As smart accountants and government administrators know, there are just too many ways to hide or bury financial details in reports that have only the appearance or veneer of transparency.

One need look no further than the current crop of reports produced by some of the local governmental entities or their sub-groups. Unfortunately, I don't know how one solves this problem in the language of the legislation you are proposing, but I imagine that a CPA/auditor with some forensic experience could suggest a report format with the right categories.

Thanks for the opportunity to add my comments, and best wishes to you and your family for a happy 2018.

Rick

Rick Caporale

District 8

Beaufort County Council

From: schsdistrict118@aol.com [schsdistrict118@aol.com]
Sent: Saturday, January 06, 2018 11:21 PM
To: skiphoagland@yahoo.com; wnewton@jsplaw.net; jeffbradley@schouse.gov; tdavis@harveyandbattey.com; marksanford99@gmail.com; Lee@brightagencyinc.com; dtigges@mcnair.net; dparrish@scprt.com; eriggs949@gmail.com; edukes@lcre.com; shellie@blufftonchamberofcommerce.org; bmiles@hiltonheadisland.org; blakelyw@beaufortsc.org; hhill@cacvbmail.com; djennings@rrhlawfirm.com; paula@phbethea.com
Cc: mkeel@sled.sc.gov; pgrant@sled.sc.gov; shamm@ethics.sc.gov; AWilson@scag.gov; dpascoe@scsolicitor1.org; will.folks@gmail.com; david@myrtlebeachsc.com; rbrundrett@islandpacket.com; cscoppe@thestate.com; mcavoylegend@gmail.com; rdeal@hiltonheadisland.org; rwarco@websterrogers.com; bcreech@websterrogers.com;

davidb@hiltonheadislandsc.gov; billyk@islc.net; tecklenburgj@charleston-sc.gov; Caporale, Rick; bensch@hargray.com; Sommerville, Paul; amesco@earthlink.net
Subject: Re: There is a Snake in the grass- House Bill 3931–recent FBI raid on Berkeley SC Chamber tip of iceberg

Here is the summary text of the bill. I make it clear that any public funds must be accounted for quarterly. The only group I belong to is the Rotary and as far as being crooked Skip, you may want to rethink that statement. This Bill if passed will make all public monies expenditure report available at anytime to anyone.

I invite all the folks on this email to read it and comment, if they think there is a way to make it better, please advise.

BH

H 3931 General Bill, By Herbkersman<http://www.scstatehouse.gov/member.php?code=832954446&chamber=H>
Similar (S 0472<http://www.scstatehouse.gov/billsearch.php?billnumbers=472&session=122&summary=B&headerfooter=1>)
Summary: Non-profits
A BILL TO AMEND THE CODE OF LAWS OF SOUTH CAROLINA, 1976, BY ADDING SECTION 11-1-130 SO AS TO REQUIRE CERTAIN NONPROFIT CORPORATIONS THAT RECEIVE MORE THAN ONE HUNDRED DOLLARS IN PUBLIC FUNDS TO SUBMIT A QUARTERLY EXPENDITURE REPORT TO THE AWARDING JURISDICTION, AND TO PROVIDE THAT THE AWARDING JURISDICTION MUST MAKE THE REPORTS AVAILABLE TO THE PUBLIC.

-----Original Message-----
From: CC Hoagland <skiphoagland@yahoo.com>
To: William G. Bill Herbkersman <schsdistrict118@aol.com>; Weston Newton <wnewton@jsplaw.net>; jeffbradley <jeffbradley@schouse.gov>; tdavis <tdavis@harveyandbattey.com>; marksanford99 <marksanford99@gmail.com>; Lee Bright <Lee@brightagencyinc.com>; david tigges <dtigges@mcnair.net>; Duane Parrish <dparrish@scprt.com>; eriggs949 <eriggs949@gmail.com>; edukes <edukes@lcre.com>; shellie <shellie@blufftonchamberofcommerce.org>; bill miles <bmiles@hiltonheadisland.org>; Blakely Williams <blakelyw@beaufortsc.org>; hhill <hhill@cacvbmail.com>; djennings <djennings@rrhlawfirm.com>; paula <paula@phbethea.com>
Cc: Sled Paul Grant Sled Paul Grant <mkeel@sled.sc.gov>; Sled Paul Grant Sled Paul Grant <pgrant@sled.sc.gov>; shamm <shamm@ethics.sc.gov>; Attorney General Alan Wilson Attorney General Allan Wilson <AWilson@scag.gov>; dpascoe <dpascoe@scsolicitor1.org>; Will Folks <will.folks@gmail.com>; david <david@myrtlebeachsc.com>; Thenerve.org Rick <rbrundrett@islandpacket.com>; Cindi Ross Scoppe <cscoppe@thestate.com>; Ryan McAvoy <mcavoylegend@gmail.com>; rdeal <rdeal@hiltonheadisland.org>; rwarco <rwarco@websterrogers.com>; bcreech <bcreech@websterrogers.com>; davidb <davidb@hiltonheadislandsc.gov>; Billy Keyserling <billyk@islc.net>; tecklenburgj <tecklenburgj@charleston-sc.gov>; rcaporale <rcaporale@bcgov.net>; Cynthia Bensch <bensch@hargray.com>; psommerville <psommerville@bcgov.net>; David Ames <amesco@earthlink.net>
Sent: Sat, Jan 6, 2018 8:49 pm
Subject: Re: There is a Snake in the grass- House Bill 3931–recent FBI raid on Berkeley SC Chamber tip of iceberg

Bill your crooked H 3931 is an attempt to try and keep your buddies at the Hilton head Chamber from going to prison, and will not work. The FBI cares about crimes not crooked Bills introduced by crooked politicians. No escape for Bill miles, David Tigges, Paula Bethea and many others.

Mr Herbkersman, the Fbi raid on the Berkeley County SC Chamber is just tip of iceberg for SC and all the crooks stealing millions of our atax monies in violation of IRS Ubit laws, and much more unconstitutional misuse of our tax funds.

When the Fbi finds out who is behind this B3931, it will just lead to more investigations, Forensic audits and convictions.

Mr Herbkersman is no wrong doing is discovered from a forensic audit of the Hilton head Chamber, we will write you a check for 100k and apologize, if there is you pay me 1.00 put your H 3931 in the garbage.

How is it possible to have so many crooks in one state. Thank God I am only part time now, and a

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Florida resident.

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260<tel:843-384-7260>
Buenos Aires , Argentina
011-54-9-11-5942-3202<tel:011-54-9-11-5942-3202>

On Jan 6, 2018, at 6:49 PM, CC Hoagland <skiphoagland@yahoo.com<mailto:skiphoagland@yahoo.com>> wrote:

This is why we need FBI IRS involvement as SC is rotten to the core. Mr Bill Herbkersman needs to even be investigated, along with David Tigges the most crooked lawyer in SC.
http://www.islandpacket.com/opinion/letters-to-the-editor/article193228049.html

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260<tel:843-384-7260>
Buenos Aires , Argentina
011-54-9-11-5942-3202<tel:011-54-9-11-5942-3202>

Virus-free. www.avast.com

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

E-Mail #3

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702933

Gmail by Google

Gregg Alford <gregg@alfordlawsc.com>

Re: Why and how to audit Al Capone in SC !!!!!!! Cary Corbett Sea Pines employee crook responds

1 message

Skip Hoagland <shoagland@me.com> Mon, Jan 15, 2018 at 6:21 PM
To: Cary Corbitt <CCorbitt@seapines.com>, Steve Birdwell <sbirdwell@seapines.com>, John Munro <JMunro@seapines.com>, b_fleming@hargray.com, bortonb@uscb.edu, Brad Marra <bmarra@palmettodunes.com>, david tigges <dtigges@mcnair.net>, bill miles <bmiles@hiltonheadisland.org>, Attorney General Alan Wilson Attorney General Allan Wilson <AWilson@scag.gov>, Sled Paul Grant Sled Paul Grant <mkeel@sled.sc.gov>, paula@phbethea.com, jwiendl@sonesta.com
Cc: "Komanecky, DeAnn" <DeAnn.Komanecky@blufftontoday.com>, Marilyn Bullard <bullardpiwko@aol.com>, "marksanford99@gmail.com" <marksanford99@gmail.com>, "christina.gwozdz@beaufort.k12.sc.us" <christina.gwozdz@beaufort.k12.sc.us>, "zoomru@yahoo.com" <zoomru@yahoo.com>, bill miles <bmiles@hiltonheadisland.org>, "Jeffrey.Moss@beaufort.k12.sc.us" <Jeffrey.Moss@beaufort.k12.sc.us>, "stever@hiltonheadislandsc.gov" <stever@hiltonheadislandsc.gov>, "gregg@alfordlawsc.com" <gregg@alfordlawsc.com>, "jgruber@bcgov.net" <jgruber@bcgov.net>, Blakely Williams <blakelyw@beaufortsc.org>, "psommerville@bcgov.net" <psommerville@bcgov.net>, "morlando@townofbluffton.com" <morlando@townofbluffton.com>, "mdukes@bcgov.net" <mdukes@bcgov.net>, "edukes@lcre.com" <edukes@lcre.com>, Weston Newton <wnewton@jsplaw.net>, "jwiendl@sonesta.com" <jwiendl@sonesta.com>, "paula@phbethea.com" <paula@phbethea.com>, Tom Upshaw <GTomUpshaw@gmail.com>, "jupshaw@uscb.edu" <jupshaw@uscb.edu>, david tigges <dtigges@mcnair.net>, "William G. Bill Herbkersman" <schsdistrict118@aol.com>, "eriggs949@gmail.com" <eriggs949@gmail.com>, Duane Parrish <dparrish@scprt.com>, "brad.dean@visitmyrtlebeach.com" <brad.dean@visitmyrtlebeach.com>, "hhill@cacvbmail.com" <hhill@cacvbmail.com>, "djennings@rrhlawfirm.com" <djennings@rrhlawfirm.com>, "mark@marksanford.com" <mark@marksanford.com>, "mcovert@bcgov.net" <mcovert@bcgov.net>, "tecklenburgj@charleston-sc.gov" <tecklenburgj@charleston-sc.gov>, "JohnM@hiltonheadislandsc.gov" <JohnM@hiltonheadislandsc.gov>, Tom Lennox <toml@hiltonheadislandsc.gov>, "WilliamH@hiltonheadislandsc.gov" <WilliamH@hiltonheadislandsc.gov>, Steve Birdwell <sbirdwell@seapines.com>, John Munro <JMunro@seapines.com>, "john@scrla.org" <john@scrla.org>, "ted.pitts@scchamber.net" <ted.pitts@scchamber.net>, Otis Rawl Otis Rawl <otis@lexingtonsc.org>, "sunny.philips@scchamber.net" <sunny.philips@scchamber.net>, "susan@surfcityusa.com" <susan@surfcityusa.com>, "susanthomas@suncity.org" <susanthomas@suncity.org>, "brianh@hiltonheadislandsc.gov" <brianh@hiltonheadislandsc.gov>, "patricia@facesdayspa.com" <patricia@facesdayspa.com>, Brad Marra <bmarra@palmettodunes.com>, Carolyn Vanagel <cvanagel@hhiconcours.com>, "stewartbrown@yahoo.com" <stewartbrown@yahoo.com>, "b_fleming@hargray.com" <b_fleming@hargray.com>, "gregd@hiltonheadislandsc.gov" <gregd@hiltonheadislandsc.gov>, "jeffbradley@schouse.gov" <jeffbradley@schouse.gov>, Sarah Borton Sarah Borton <sgillis@islandpacket.com>, "bortonb@uscb.edu" <bortonb@uscb.edu>, Terry Finger <tfinger@fingerlaw.com>, "lsulka@townofbluffton.com" <lsulka@townofbluffton.com>, "bcreech@websterrogers.com" <bcreech@websterrogers.com>, "rdeal@hiltonheadisland.org" <rdeal@hiltonheadisland.org>, "rwarco@websterrogers.com" <rwarco@websterrogers.com>, Ryan McAvoy <mcavoylegend@gmail.com>, Brian Tolley <btolley@islandpacket.com>, "dpascoe@scsolicitor1.org" <dpascoe@scsolicitor1.org>, Sled Paul Grant Sled Paul Grant <mkeel@sled.sc.gov>, Attorney General Alan Wilson Attorney General Allan Wilson <AWilson@scag.gov>, "shamm@ethics.sc.gov" <shamm@ethics.sc.gov>, "mburchstead@ethics.sc.gov" <mburchstead@ethics.sc.gov>, "jbagnall@ethics.sc.gov" <jbagnall@ethics.sc.gov>, "brogers@scpress.org" <brogers@scpress.org>, Jay Bender <jbender@brblegal.com>, "tdavis@harveyandbattey.com" <tdavis@harveyandbattey.com>, "KimL@hiltonheadislandsc.gov" <KimL@hiltonheadislandsc.gov>, Marc Frey <mfrey@freymedia.com>, gerard mahieu <gerardmahieu@aol.com>, Liz Farrell <efarrell@islandpacket.com>, Jim Bequette <jwbterp@aol.com>, rick caporale <rcaporale@bcgov.net>, Josephine A Orischak <Josephine.Orischak@beaufort.k12.sc.us>, Stern Allan <spiker149@hargray.com>, Don Brashears <Tmbdab@aol.com>, Auditor <auditor@bcgov.net>, "s. fobes" <sfobes@bcgov.net>, Tom Davis <tom@senatortomdavis.com>, Tonya V Crosby <tonya.crosby@beaufort.k12.sc.us>, "<info@windrunnerstables.com>" <info@windrunnerstables.com>, Wilbur M Payne <wilbur.payne@beaufort.k12.sc.us>, Tim Scott <joe_mckeown@scott.senate.gov>, Taylor Smith <taylor@harrisonfirm.com>, Giles Hall <usn1066@gmail.com>, Earl Campbell <earl.campbell@beaufort.k12.sc.us>, David R Striebinger <david.striebinger@beaufort.k12.sc.us>, David Williams <dwilliams@sled.sc.gov>, Joseph R Dunkle <joseph.dunkle@beaufort.k12.sc.us>, Lisa Gibson <lgibson@scag.gov>, Robyn L Cushingberry <Robyn.Cushingberry@beaufort.k12.sc.us>, REBECCA BASS <muttleycrew2008@gmail.com>, John Crangle <johncrangle2@gmail.com>, Staff <contact@beaufortwatchdog.org>, Joan Deery <jdpc@hargray.com>, Cynthia W Gregory <cynthia.gregory@beaufort.k12.sc.us>, "shannonerickson@schouse.org" <shannonerickson@schouse.org>, Alden Bauer <aldenbauer706@gmail.com>, Jiaco <jiaco@bellsouth.net>, Cnrgbr <cnrgbr@hargray.com>, Sled Paul Grant Sled Paul Grant <pgrant@sled.sc.gov>, Kelly Meyerhofer <kmeyerhofer@islandpacket.com>, "s. rodman" <srodman@bcgov.net>, brian flewelling <brianf@bcgov.net>, "g. dawson" <gdawson@bcgov.net>, Jennifer A Staton <jennifer.staton@beaufort.k12.sc.us>, Jerry Stewart <jstewart@bcgov.net>, "michaelrivers@schouse.gov" <michaelrivers@schouse.gov>, Richard Gregory <rgregory@sled.sc.gov>, fran bisi <eyelandart@yahoo.com>, Geraldine C Kinton <Geraldine.Kinton@beaufort.k12.sc.us>, Jerry at the Beach <gringoviejotwo@yahoo.com>, Ami Franklin <ami@ethics.sc.gov>, "Thenerve.org Rick" <rbrundrett@islandpacket.com>, Mary M Cordray <mary.cordray@beaufort.k12.sc.us>, John Dowling <dowlingjohn287@gmail.com>, "peter@mediafeedia.com" <peter@mediafeedia.com>, Will Folks <will.folks@gmail.com>, "david@myrtlebeachsc.com" <david@myrtlebeachsc.com>, David Lauderdale <letters@islandpacket.com>, Alex Kinkaid <akincaid@islandpacket.com>, Jeremia Froyland

<jeremiafroyland@gmail.com>, Art Davis <art@globallylocally.com>, "josh.metnick@gmail.com" <josh.metnick@gmail.com>, "davidb@hiltonheadislandsc.gov" <davidb@hiltonheadislandsc.gov>, David Ames <amesco@earthlink.net>, "pbrowning@postandcourier.com" <pbrowning@postandcourier.com>, Scott Brandon <SBrandon@thebrandonagency.com>, Beverly Shelly <bshelley@scprt.com>, John Keener <john@charlestoncrabhouse.com>, School Board <bisi@roadrunner.com>, "bhaley@hhivacations.com" <bhaley@hhivacations.com>, Lee Bright <Lee@brightagencyinc.com>, "dlauderdale@islandpacket.com" <dlauderdale@islandpacket.com>, Lucas High <lhigh@islandpacket.com>, Stephen Fastenau <sfastenau@islandpacket.com>, sarah borton <sborton@islandpacket.com>, "jrosen@rrhlawfirm.com" <jrosen@rrhlawfirm.com> "Linton@WGFLLAW.com" <Linton@wgfllaw.com>, "Walker@WGFLLAW.com" <Walker@wgfllaw.com>, "pbarnes@parkerbarneslaw.com" <pbarnes@parkerbarneslaw.com>, "jparker@pmped.com" <jparker@pmped.com>, Sarah Sanford <sarahsanford@palmettobluffonline.com>, Barrett Brewer <BBrewer@clawsonandstaubes.com>, "bstevenson@clawsonandstaubes.com" <bstevenson@clawsonandstaubes.com>, "Thenerve.org Rick" <rick.brundrett@gmail.com>

Carey most honest people are. You are one of the lying corrupted crooks, I want investigated for your involvement in LCGOA with crook Bill miles and others. Including Brad Marra on Atax Committee, Bill miles ownership and profit from this, fact you intentionally put Mac Frey and Golfers Guide out of business, you are in violation of Irs Ubit tax laws, unfairly compete against local media .....I certainly understand why you sent this response. If I was you,I would be in fear for the damage and corruption you are involved with. You will
need a good lawyer. My I recommend crook Lawyer David Tigges, Bill Miles and Steve Rileys law from Mcnair law firm, he will be the perfect lawyer for you. Thanks

DeAnn thanks lots of luck wherever you are, I would just block
the emails and wish you had informed us sooner. We are only interested in local press. However the same corruption will Probably be in your new city as well. It's nationwide. Much success !

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jan 15, 2018, at 10:04 AM, Cary Corbitt <CCorbitt@seapines.com> wrote:

I believe most all on this list would like to be removed from this negative tirade.

<image001.jpg>

Cary Corbitt
Vice President

Sports & Operations
Phone 843.842.1807

Mobile 843.384.7339

ccorbitt@seapines.com

<image002.jpg>

From: Komanecky, DeAnn [mailto:DeAnn.Komanecky@blufftontoday.com]
Sent: Monday, January 15, 2018 9:11 AM
To: Skip Hoagland; Marilyn Bullard
Cc: marksanford99@gmail.com; christina.gwozdz@beaufort.k12.sc.us; zoomru@yahoo.com; bill miles; Jeffrey.Moss@beaufort.k12.sc.us; stever@hiltonheadislandsc.gov; gregg@alfordlawsc.com; jgruber@bcgov.net; Blakely Williams; psommerville@bcgov.net; morlando@townofbluffton.com;

ELECTRONICALLY FILED 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

mdukes@bcgov.net; edukes@lcre.com; Weston Newton; jwiendl@sonesta.com; paula@phbethea.com; Tom Upshaw; jupshaw@uscb.edu; david tigges; William G. Bill Herbkersman; eriggs949@gmail.com; Duane Parrish; brad.dean@visitmyrtlebeach.com; hhill@cacvbmail.com; djennings@rrhlawfirm.com; mark@marksanford.com; mcovert@bcgov.net; tecklenburgj@charleston-sc.gov; JohnM@hiltonheadislandsc.gov; Tom Lennox; WilliamH@hiltonheadislandsc.gov; Steve Birdwell; John Munro; john@scrla.org; ted.pitts@scchamber.net; Otis Rawl Otis Rawl; sunny.philips@scchamber.net; susan@surfcityusa.com; susanthomas@suncity.org; brianh@hiltonheadislandsc.gov; patricia@facesdayspa.com; Cary Corbitt; Brad Marra; Carolyn Vanagel; stewartbrown@yahoo.com; b_fleming@hargray.com; gregd@hiltonheadislandsc.gov; jeffbradley@schouse.gov; Sarah Borton Sarah Borton; bortonb@uscb.edu; Terry Finger; lsulka@townofbluffton.com; bcreech@websterrogers.com; rdeal@hiltonheadisland.org; rwarco@websterrogers.com; Ryan McAvoy; Brian Tolley; dpascoe@scsolicitor1.org; Sled Paul Grant Sled Paul Grant; Attorney General Alan Wilson Attorney General Allan Wilson; shamm@ethics.sc.gov; mburchstead@ethics.sc.gov; jbagnall@ethics.sc.gov; brogers@scpress.org; Jay Bender; tdavis@harveyandbattey.com; KimL@hiltonheadislandsc.gov; Marc Frey; gerard mahieu; Liz Farrell; Jim Bequette; rick caporale; Josephine A Orischak; Stern Allan; Don Brashears; Auditor; s. fobes; Tom Davis; Tonya V Crosby; <info@windrunnerstables.com>; Wilbur M Payne; Tim Scott; Taylor Smith; Giles Hall; Earl Campbell; David R Striebinger; David Williams; Joseph R Dunkle; Lisa Gibson; Robyn L Cushingberry; REBECCA BASS; John Crangle; Staff; Joan Deery; Cynthia W Gregory; shannonerickson@schouse.org; Alden Bauer; Jiaco; Cnrgbr; Sled Paul Grant Sled Paul Grant; Kelly Meyerhofer; s. rodman; brian flewelling; g. dawson; Jennifer A Staton; Jerry Stewart; michaelrivers@schouse.gov; Richard Gregory; fran bisi; Geraldine C Kinton; Jerry at the Beach; Ami Franklin; Thenerve.org Rick; Mary M Cordray; John Dowling; peter@mediafeedia.com; Will Folks; david@myrtlebeachsc.com; David Lauderdale; Alex Kinkaid; Jeremia Froyland; Art Davis; josh.metnick@gmail.com; davidb@hiltonheadislandsc.gov; David Ames; pbrowning@postandcourier.com; Scott Brandon; Beverly Shelly; John Keener; School Board; bhaley@hhivacations.com; Lee Bright; dlauderdale@islandpacket.com; Lucas High; Stephen Fastenau; sarah borton; jrosen@rrhlawfirm.com; Linton@WGFLLAW.com; Walker@WGFLLAW.com; pbarnes@parkerbarneslaw.com; jparker@pmped.com; Sarah Sanford; Barrett Brewer; bstevenson@clawsonandstaubes.com
Subject: RE: Why and how to audit Al Capone in SC !!!!!!!

Please remove me from this list.

DeAnn Komanecky

DeAnn Komanecky

Savannah Morning News

912.652.0324

cell 912.288.1465

From: Skip Hoagland [mailto:shoagland@me.com]
Sent: Sunday, January 14, 2018 2:16 PM
To: Marilyn Bullard
Cc: marksanford99@gmail.com; christina.gwozdz@beaufort.k12.sc.us; zoomru@yahoo.com; bill miles; Jeffrey.Moss@beaufort.k12.sc.us; stever@hiltonheadislandsc.gov; gregg@alfordlawsc.com; jgruber@bcgov.net; Blakely Williams; psommerville@bcgov.net; morlando@townofbluffton.com; mdukes@bcgov.net; edukes@lcre.com; Weston Newton; jwiendl@sonesta.com; paula@phbethea.com; Tom Upshaw; jupshaw@uscb.edu; david tigges; William G. Bill Herbkersman; eriggs949@gmail.com; Duane Parrish; brad.dean@visitmyrtlebeach.com; hhill@cacvbmail.com; djennings@rrhlawfirm.com; mark@marksanford.com;

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

mcovert@bcgov.net; tecklenburgj@charleston-sc.gov; JohnM@hiltonheadislandsc.gov; Tom Lennox; WilliamH@hiltonheadislandsc.gov; Steve Birdwell; John Munro; john@scrla.org; ted.pitts@scchamber.net; Otis Rawl Otis Rawl; sunny.philips@scchamber.net; susan@surfcityusa.com; susanthomas@suncity.org; brianh@hiltonheadislandsc.gov; patricia@facesdayspa.com; Cary Corbitt; Brad Marra; Carolyn Vanagel; stewartbrown@yahoo.com; b_fleming@hargray.com; gregd@hiltonheadislandsc.gov; jeffbradley@schouse.gov; Sarah Borton Sarah Borton; bortonb@uscb.edu; Terry Finger; lsulka@townofbluffton.com; bcreech@websterrogers.com; rdeal@hiltonheadisland.org; rwarco@websterrogers.com; Ryan McAvoy; Brian Tolley; dpascoe@scsolicitor1.org; Sled Paul Grant Sled Paul Grant; Attorney General Alan Wilson Attorney General Allan Wilson; shamm@ethics.sc.gov; mburchstead@ethics.sc.gov; jbagnall@ethics.sc.gov; brogers@scpress.org; Jay Bender; tdavis@harveyandbattey.com; KimL@hiltonheadislandsc.gov; Marc Frey; gerard mahieu; Liz Farrell; Jim Bequette; rick caporale; Josephine A Orischak; Stern Allan; Don Brashears; Auditor; s. fobes; Tom Davis; Komanecky, DeAnn; Tonya V Crosby; <info@windrunnerstables.com>; Wilbur M Payne; Tim Scott; Taylor Smith; Giles Hall; Earl Campbell; David R Striebinger; David Williams; Joseph R Dunkle; Lisa Gibson; Robyn L Cushingberry; REBECCA BASS; John Crangle; Staff; Joan Deery; Cynthia W Gregory; shannonerickson@schouse.org; Alden Bauer; Jiaco; Cnrgbr; Sled Paul Grant Sled Paul Grant; Kelly Meyerhofer; s. rodman; brian flewelling; g. dawson; Jennifer A Staton; Jerry Stewart; michaelrivers@schouse.gov; Richard Gregory; fran bisi; Geraldine C Kinton; Jerry at the Beach; Ami Franklin; Thenerve.org Rick; Mary M Cordray; John Dowling; peter@mediafeedia.com; Will Folks; david@myrtlebeachsc.com; David Lauderdale; Alex Kinkaid; Jeremia Froyland; Art Davis; josh.metnick@gmail.com; davidb@hiltonheadislandsc.gov; David Ames; pbrowning@postandcourier.com; Scott Brandon; Beverly Shelly; John Keener; School Board; bhaley@hhivacations.com; Lee Bright; dlauderdale@islandpacket.com; Lucas High; Stephen Fastenau; sarah borton; jrosen@rrhlawfirm.com; Linton@WGFLLAW.com; Walker@WGFLLAW.com; pbarnes@parkerbarneslaw.com; jparker@pmped.com; Sarah Sanford; Barrett Brewer; bstevenson@clawsonandstaubes.com
Subject: Re: Why and how to audit Al Capone in SC !!!!!!!!

We are at the point where we need FBI and Forced Forensic audits. We have nothing else left. I will Keep filing lawsuits, but no guarantees, as we still have to depend on SC judges to do what's right. If I lose my Foia Supreme Court case, this will prove we are corrupted all the way to the top. At this point you might want to become a Florida resident like I did or go to another state. Thanks

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland

US cell 843-384-7260

Buenos Aires , Argentina

011-54-9-11-5942-3202

On Jan 14, 2018, at 1:55 PM, Marilyn Bullard <bullardpiwko@aol.com> wrote:

> real concerns, many issues, not a matter of differing opinions anymore.
>
> State attorney and local representatives on all fronts turn away from all this. Too hot to handle.
> Lyn
> Sent from my iPhone
>
> On Jan 14, 2018, at 1:39 PM, Skip Hoagland <shoagland@me.com> wrote:
>
> > Marilyn a dead rat, my God what's next! Just read stories, to think any board member would risk this seems extremely Paranoid and delusional to me. Its simple get cameras at your home, this will end that. My idea is simple do the forensic audit, and if wrong doing is found fire Jeff moss and if crimes are discovered like just happen in Berkeley County SC with the School CFO and his 386k in theft, prison. We must get rid of every

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

local elected official who is allowing this secrecy, hired audits no independent audits to continue.

Come election time I will run full page ads on those to elect and those to boot. My fear is we will still

end up with a corrupted incompetent majority in control. Only one way to force bad peope to be good "Forensic Audit" than a Crooked Majority will not make any difference!!!!

http://www.islandpacket.com/news/local/education/article194417199.html

http://www.islandpacket.com/news/local/education/article194589539.html

Mark Sanford needs to focus on transparency, his own actions and not criticize others. I assume Trump meant merit based system versus lottery system. Most other civilized first world countries around the world do it this way. We want people who contribute to our country, that are educated and can take care of themselves, not those we have to take care of, we have plenty like that now. Is S hole the right word no, however for those who have traveled the world, I assume that entered your mind. Being blunt and not politically correct sometimes barkfires on you. Such is life, Good, Bad, and Ugly. It's always easier in this life to criticize others, versus offer real workable solutions. Mark Sanford is a total failure at this, a career politician who spends more time fund raising and protecting his own A__ than taking on real hard controversial issues that need fixing. My family donated maximum to him 3k per year in hopes he would tackle this corrupt Chamber and School board issue, and his only response was Its to controversial and he was still recovering from his Argentina girl friend problem. I do not hold his personal choice of love against him, I hold the fact he has proven to be worthless on contributing to transparency in our state. Like many, a good gift of gab, all talk and no action. Will not risk his getting re-elected.

http://www.islandpacket.com/news/local/community/beaufort-news/article194475309.html

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland

US cell 843-384-7260

Buenos Aires , Argentina

011-54-9-11-5942-3202

On Jan 14, 2018, at 12:40 PM, Marilyn Bullard <bullardpiwko@aol.com> wrote:

> As the story in today's Packet reveals you need to be careful, you may find a dead rat on your doorstep maybe the courtesy of Moss school board member supporters. No proof but - Very Suspicious- of course - will be denied. People who do this kind of vulgar stuff will never admit to it.
>
> A lie detector test should be required of all these people.
>
> Lyn Piwko Bullard
>
> Sent from my iPhone

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

On Jan 14, 2018, at 12:22 PM, Skip Hoagland <shoagland@me.com> wrote:

Only "one way" to stop and Audit Al Capone in SC. Any comments ????

Judge Dukes, do you or your brother Ed Dukes who kicked me out of the Beaufort Chamber, or your family members lawyers Rep Weston Newton and Wes Jones, have a problem with all this below, as well as Rep Bill Herbkersman changing HB 3931 to introduce and comply with all this below????

Bill Herbkersman bill is nothing but a modern day sham and scam to allow his corrupt, crooked, lying, thieving, fraud friends to keep stealing and unconstitutionally misusing millions of our tax monies. Many in the TO: field should go to prison once investigated by the FBI and IRS like Berkeley County Sc chamber and School CFO who admitted to 386 k in theft.

Judge Dukes, I want my 4500 back I was forced to pay your buddy Crook thief Town Lawyer Gregg Alford, for your gag order against me to silence my fight on corruption and violated my Federal 1st Amendment Rights Under the Constitution of the United States of America. I am a retired Florida Resident and I be damned if I will become another victim and causality of SC corruption. You are not dealing with someone who you are used to just accepting this corrupt flawed legal system. Judge Dukes this is not about gagging Skip hoagland, this is about the law arresting Lawyer Gregg Alford and others for 200k in theft of public tax payers money. Certainly you are smart enough to understand that??

So I get back to only 3 reasons why any Judge or anyone else would allow all this theft in SC to continue, your scared, incompetent or corrupted.

Everyone in the TO: field should be a person of interest to law enforcement. I have a story to tell on each one addressed and questions to answer.

1. How to audit Jeff Moss and all Beaufort County institutions and non-profits:

https://www.yankeeinstitute.ohttps://www.yankeeinstitute.org/wp-content/uploads/2015/07/Ending-Corruption-and-Waste-In-Your-Public-School.pdfrg/wp-content/uploads/2015/07/Ending-Corruption-and-Waste-In-Your-Public-School.pdf

2. How to audit Bill Miles and the Hilton Head chamber like the recent raid on the Berkeley chamber by the FBI:

https://www.mypalmbeachclerk.com/uploadedFiles/Public_Funds/conv_ctr_audit_report.pdf

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

3. How and why to audit all Chambers CVB's and city Dmo's in the state of SC:

https://www.mypalmbeachclerk.com/uploadedFiles/Publications/Alerts/alert_dec06_auditor.pdf

4. How to audit Town managers Steve Riley / Josh Gruber / Marc Orlando and Town lawyers and Mayors when needed:

http://www.seacoastonline.com/article/20071116/NEWS/711160353

5. How to audit USBC and past leadership of Jane Upshaw:

http://m.state-journal.com/2017/10/05/kentucky-state-university-president-requests-forensic-audit-of-universitys-books-from-last-five-years/

6. How to Audit Duane Parrish head of SC PRT and Ed Riggs SC Terc:

https://www.mackinac.org/22929

https://www.mackinac.org/22921

7. Why the SC Chamber leader, Ted Pitts and Otis Rawl needs to be investigated and audited by its' members. It's simple, he is a lying crook no other reason needed.

https://www.fitsnews.com/2016/08/26/lowcountry-businessman-rages-against-sc-chamber/

8. Why audit of Paula Bethea Hilton Head chamber and past SC lottery commissioner:

https://www.fitsnews.com/2012/11/01/sc-lottery-money-is-missing/

So conclusion is simple, anything less than these type audits and independent methods is simply 'Happy Horse Manure' and Kool-aid drinks served by the local crooks to keep stealing and unconstitutionally misusing and wasting hundreds of millions of our tax monies.

On Jan 10, 2018, at 12:58 PM, Philip Branton <zoomru@yahoo.com> wrote:

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Skip, Marilyn and all concerned "observers",

Everyone's efforts and concerns and awareness are highly warranted. The informational flow and dynamics at hand goes beyond the scope being described.

It would be most helpful for everyone concerned to think of these chain of events and historical tax dollar accountability issues as it relates to the IRS and tax law and the Security and Exchange Commission.

How do you stop Al Capone in 2018..?

More laws.....sadly, NO.

Think of the issues and accountability verification that taxpayers and ratepayers expect.

Think of the real issues that Bill Miles and Lawyer David Tigges really face. Think of a Borton retirement..?

It's the actual digital mountain of evidence sitting behind certain servers and remote access at the South Carolina Law Enforcement Division (SLED) that is NOT being divulged. Does anyone here really think that SC Senator Tom Davis has a clue or is informed about his own data or anyone else..?

That is the informational leverage being brought to bear.

Pulling the information from the Beaufort County Chamber of Commerce is only one facet. It is only a portion of data needed and questionably verifiable in a court of law due to the lawyers representing both sides of the informational stream.

Stop and consider the information on Hargrave Communication servers serving Beaufort County alone. Now, think of the statewide server network and consider the oversight implications with respect to the Fusion Center data accountability and its Homeland Security dominoes. Mr. Miles and Mr. Tigges have no real clue how their

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

informational goose is already cooked. Corrupt or not.

What do you think will happen when those server records are pulled in support of a class action lawsuit..? The documentation provided will pale in comparison to the data that the NSA will compartmentalize separately from SLED.

That will have seismic results statewide and nationally.

So.....just sit and think....right now as you read this and look at the advertising tracking via yahoo or Comcast or Google or Verizon.

How are these corporate data hives more informed than Tammy Rawl or Mr Keel at SLED about the accounting and oversight and activity of the Beaufort County Chamber of Commerce or the workers in the legal department of the city of Hilton Head Island or Sea Pines..?

It's not scary stuff.....it is just the reality we all live in.

How do you think David Pascoe will use information provided by Rick Quinn or Bobby Harrell or Tammy Rawl to verify accountable actions in any county or city across our state..?

Everyone's actions and concerns and class action awareness is more valuable than anyone is really being told.

Thank you all.....

Chris Branton

Sent from Yahoo Mail on Android

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

On Wed, Jan 10, 2018 at 11:13 AM, Skip Hoagland

<shoagland@me.com> wrote:

> I tried the nice method and just talking for 20 yrs and it did not work. My harsh criticism and lawsuits seem to be working and getting more attention. My facts and info also seemed to result in the FBI raid on the Berkeley County SC chamber and School cfo 386k theft. So yes I will stay the course on brash and hard nosed and suggest others do the same. Liars, crooks and thieves of our tax monies will not react to all talk and no action. They will just wait you out until you burn out and go away. Thanks
>
> We must get the Towns involved who secretly used our tax funds to join the chambers and refusing to ask the chambers for access under the non profit corporation act, more corruption. The Packet is a member under past corrupted publisher Sara Borton who is now gone, who censored our local news and harmed this community for 25 yrs.
>
> The Packet seems to have now ended this censorship and reporting the news we all deserve in the community.
>
> Please get other chamber members involved to support Ryan McAvoy who has sued the Hilton head Chamber for access to its financials for members who are essence owners/ investors/ stakeholders. As expected crook Bill miles and Lawyer David Tigges are fighting him, now trying to say he isn't a member. Like me fighting Foia for tax payers. They must be in great fear and have lots to hide spending thousands of tax monies and members dues to lawyers, using the very money of those to hide info from them. This chamber has even refused the membership of a local lawyer and my self. I ask everyone to join and seek this info under the non profit corporation act laws of SC, we will pay your membership to join in the lawsuit with Ryan McAvoy who had the courage to do this like me with no fear of retaliation. It's all free to you, just need your courage and concern to act. This non profit act will negate the need for Foia and HB 3931 being introduced by crook Bill Herbkersman and others supporters like Weston Newton, Tom Davis. This is the most outrageous crooked corrupted House Bill 3931 I have ever seen. I hope they all end up in Prison.Thanks

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland

US cell 843-384-7260

Buenos Aires , Argentina

011-54-9-11-5942-3202

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland

US cell 843-384-7260

Buenos Aires , Argentina

011-54-9-11-5942-3202

On Jan 10, 2018, at 9:54 AM, Marilyn Bullard <bullardpiwko@aol.com> wrote:

> Mr. Hoagland:
> While some people consider you brash and hard-nosed, others appreciate your determination.
> Surprisingly Mr. Lauderdale agrees with your assessment of the recent proposed Bill H.'s faux transparency bill regarding public funds to private organizations.
> So you are making progress for truth and Transparency.
> While I appreciate the Packets efforts, much more needs to be exposed on the Chamber along with how the feel good description of School Choice is hiding a trend towards White Flight for White Majority Schools in Bluffton, with the Supt and majority school board upping higher classroom capacity in 2016 to accommodate more choice students and now wanting a

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

money referendum to add more classrooms to these schools to encourage more of this choice program. The school district will never admit to this type of racial segregation or that the logistics of this school district cannot provide the same educational choice opportunities for all students.
Regards,
Lyn Piwko Bullard
Sent from my iPhone

CONFIDENTIAL: This e-mail and any files transmitted with it are the property of The Sea Pines Resort, LLC. and its affiliates. All rights, including without limitation copyright, are reserved. The proprietary information contained in this e-mail message, and any files transmitted with it, is intended for the use of the recipient(s) named above. If the reader of this e-mail is not the intended recipient, you are hereby notified that you have received this e-mail in error and that any review, unauthorized disclosure, distribution or copying of this e-mail or any files transmitted with it is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately and delete the original message and any files transmitted. The unauthorized use of this e-mail or any files transmitted with it is prohibited and disclaimed by The Sea Pines Resort, LLC and its affiliates. Nothing in this communication is intended to operate as an electronic signature under applicable law.

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

E-Mail #4

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Vicki Allison

From: Gregg Alford
Sent: Friday, January 12, 2018 12:09 PM
To: vicki@alfordlawsc.com
Subject: FW: New 100 k cash reward offered by Skip Hoagland !!!!!!To anyone who provides info leading to the arrest, conviction and imprisonment of any local official, school employee, Chamber employee and local lawyer tied to this corruption

Gregory M. Alford
Alford Law Firm, LLC
P.O. Drawer 8008
Hilton Head Island, SC 29938
(843) 842-5500
(843) 842-8400 fax

CONFIDENTIALITY NOTE: THE INFORMATION CONTAINED IN THIS ELECTRONIC MAIL TRANSMISSION IS LEGALLY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING THIS ELECTRONIC MAIL MESSAGE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS ELECTRONIC MAIL IN ERROR, PLEASE ACCEPT OUR APOLOGIES AND IMMEDIATELY DELETE IT, AS WELL AS NOTIFYING US OF THE ERROR BY REPLYING TO THIS ELECTRONIC MAIL OR CALL US AT 843-842-5500.

From: CC Hoagland [mailto:skiphoagland@yahoo.com]
Sent: Friday, January 12, 2018 11:54 AM
To: Linton@WGFLLAW.com; gregg@alfordlawsc.com; Barrett Brewer; bstevenson@clawsonandstaubes.com
Cc: CC Hoagland
Subject: Re: New 100 k cash reward offered by Skip Hoagland !!!!!!To anyone who provides info leading to the arrest, conviction and imprisonment of any local official, school employee, Chamber employee and local lawyer tied to this corruption

To add I forgot, and to prove further what a dirty lying crook Alford and Linton is on top of Alford being a corrupted crook and thief of tax funds, he wants to try and claim he needs depos that relate to our case of Cathys business partner and a mistress with Mark Sanford and Bill Clinton theory and worse next he will want to show I am a SC version of Anthony wiener and Harvey Weinstein. Insane and Alford must be in great fear. Assume i was a criminal in prison, that has nothing to do with this case based on laws.
I repeat I expose corruption not create corruption. I am the messenger of facts and laws. Now they want to keep making up lies and attacking the messenger to camo their crimes to try and discredit the real facts presented by me the messenger.

What's next for their desperate attempt to try and escape their illegal criminal acts? Nothing would surprise me !

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jan 11, 2018, at 6:34 PM, Skip Hoagland <shoagland@me.com> wrote:

Let me be clear I did not say Kim Likins was a danger to children and I did not say I will donate money as a rich guy if you fired Kim Likins. I am in fact a poor retired man and never told anyone I was rich. These are made up sick twisted and fabricated lies by Linton and Alford and their lying clients in desperate attempt to try and paint me in a bad light to the jury to win, silence my fight to force transparency in our government in behalf of all tax payers, including the jury who will hear this case. These lies were done to try and further profit your crooked corrupted pockets using tax monies for your clients private frivolous slander case. Everything I said about Kim Likins and anyone else is true. You can not provide one email, phone recording, or a third party individual who would ever say I said this. I would take a polygraph test and ask you do the same.

The lawyers involved in all this are using tax monies to line their pockets that was and is an illegal criminal act and far worse than my speeches and harsh criticism as a concerned citizen.

I did say, I or someone should beat your brains out to Crook Gregg Alford, after he shot me a bird / Finger close to his chest when no one was looking to antagonize me. I find it outrageous a lawyer would do this in a deposition . Why else would me or anyone have this type of mad knee jerk response out of the blue for no reason. No one I know would tell you I would say or do this. This was a man's football field, Hockey game or any other sport type fight response with the other team . I regret I let this corrupted crook thief Lawyer of tax payers money caused me to say this. However for his crimes and theft of 200k in tax monies and coaching others to lie for him, he should be disbarred and put in prison. Send this to the Judge and read aloud to the jury.

I am simply a retired man, giving back to society in my retirement. I founded 2 watch dog groups trying to force transparency by our local officials who have failed us. I fight for all tax payers including this jury. At 70 yrs old I do not lie, and I do not need to lie or gain from doing so. I fight corruption I don't cause corruption. If any jury rules against me, they are ruling against themselves, as no one will step up like I have ever again to fight for all tax payers, and the crooks will win and go back to unconstitutionally misusing and stealing our tax money.

This lawsuit using stolen tax monies against me should have never been allowed to even get this far and should have been tossed out of court. By allowing it to proceed by SC judges has caused many damages to my wife and I and will address all this in a court of law.

I have much more to say but will stop here.

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina

2

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

011-54-9-11-5942-3202

Begin forwarded message:

From: Skip Hoagland <shoagland@me.com>
Date: January 11, 2018 at 5:51:15 PM EST
To: "zoomru@yahoo.com" <zoomru@yahoo.com>, gregg@alfordlawsc.com, david tigges <dtigges@mcnair.net>, JohnM@hiltonheadislandsc.gov, bill miles <bmiles@hiltonheadisland.org>
Cc: Marilyn Bullard <bullardpiwko@aol.com>, Ryan McAvoy <mcavoylegend@gmail.com>, Brian Tolley <btolley@islandpacket.com>, "dpascoe@scsolicitor1.org" <dpascoe@scsolicitor1.org>, Sled Paul Grant Sled Paul Grant <mkeel@sled.sc.gov>, Attorney General Alan Wilson Attorney General Allan Wilson <AWilson@scag.gov>, "shamm@ethics.sc.gov" <shamm@ethics.sc.gov>, "mburchstead@ethics.sc.gov" <mburchstead@ethics.sc.gov>, "jbagnall@ethics.sc.gov" <jbagnall@ethics.sc.gov>, "brogers@scpress.org" <brogers@scpress.org>, Jay Bender <jbender@brblegal.com>, "jwiendl@sonesta.com" <jwiendl@sonesta.com>, Duane Parrish <dparrish@scprt.com>, "William G. Bill Herbkersman" <schsdistrict118@aol.com>, "tdavis@harveyandbattey.com" <tdavis@harveyandbattey.com>, Weston Newton <wnewton@jsplaw.net>, "jeffbradley@schouse.gov" <jeffbradley@schouse.gov>, "lsulka@townofblufftón.com" <lsulka@townofblufftón.com>, "KimL@hiltonheadislandsc.gov" <KimL@hiltonheadislandsc.gov>, Terry Finger <tfinger@fingerlaw.com>, Marc Frey <mfrey@freymedia.com>, gerard mahieu <gerardmahieu@aol.com>, Liz Farrell <efarrell@islandpacket.com>, Jim Bequette <jwbterp@aol.com>, rick caporale <rcaporale@bcgov.net>, Josephine A Orischak <Josephine.Orischak@beaufort.k12.sc.us>, Covert Michael <mcovert@bcgov.net>, Stern Allan <spiker149@hargray.com>, Don Brashears <Tmbdab@aol.com>, Auditor <auditor@bcgov.net>, "s. fobes" <sfobes@bcgov.net>, Tom Davis <tom@senatortomdavis.com>, Deann Komanecky <deann.komanecky@blufftontoday.com>, Tonya V Crosby <tonya.crosby@beaufort.k12.sc.us>, "<info@windrunnerstables.com>" <info@windrunnerstables.com>, Christina S Gwozdz <christina.gwozdz@beaufort.k12.sc.us>, Wilbur M Payne <wilbur.payne@beaufort.k12.sc.us>, Tim Scott <joe_mckeown@scott.senate.gov>, Taylor Smith <taylor@harrisonfirm.com>, Giles Hall <usn1066@gmail.com>, Earl Campbell <earl.campbell@beaufort.k12.sc.us>, David R Striebinger <david.striebinger@beaufort.k12.sc.us>, David Williams <dwilliams@sled.sc.gov>, Joseph R Dunkle <joseph.dunkle@beaufort.k12.sc.us>, Lisa Gibson <lgibson@scag.gov>, Robyn L Cushingberry <Robyn.Cushingberry@beaufort.k12.sc.us>, REBECCA BASS <muttleycrew2008@gmail.com>, John Crangle <johncrangle2@gmail.com>, Staff <contact@Beaufortwatchdog.org>, Joan Deery <jdpc@hargray.com>, Cynthia W Gregory <cynthia.gregory@beaufort.k12.sc.us>, "shannonerickson@schouse.org" <shannonerickson@schouse.org>, Alden Bauer <aldenbauer706@gmail.com>, Jiaco <jiaco@bellsouth.net>, Cnrgbr <cnrgbr@hargray.com>, Sled Paul Grant Sled Paul Grant <pgrant@sled.sc.gov>,

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Kelly Meyerhofer <kmeyerhofer@islandpacket.com>, "s. rodman" <srodman@bcgov.net>, brian flewelling <brianf@bcgov.net>, "g. dawson" <gdawson@bcgov.net>, Jennifer A Staton <jennifer.staton@beaufort.k12.sc.us>, Jerry Stewart <jstewart@bcgov.net>, Mark Sanford <marksanford99@gmail.com>, "michaelrivers@schouse.gov" <michaelrivers@schouse.gov>, Richard Gregory <rgregory@sled.sc.gov>, fran bisi <eyelandart@yahoo.com>, Geraldine C Kinton <Geraldine.Kinton@beaufort.k12.sc.us>, Jerry at the Beach <gringoviejotwo@yahoo.com>, Ami Franklin <ami@ethics.sc.gov>, "Thenerve.org Rick" <rbrundrett@islandpacket.com>, Mary M Cordray <mary.cordray@beaufort.k12.sc.us>, John Dowling <dowlingjohn287@gmail.com>, "peter@mediafeedia.com" <peter@mediafeedia.com>, Will Folks <will.folks@gmail.com>, "david@myrtlebeachsc.com" <david@myrtlebeachsc.com>, David Lauderdale <letters@islandpacket.com>, Alex Kinkaid <akincaid@islandpacket.com>, Jeremia Froyland <jeremiafroyland@gmail.com>, Art Davis <art@globallylocally.com>, "josh.metnick@gmail.com" <josh.metnick@gmail.com>, "susan@surfcityusa.com" <susan@surfcityusa.com>, "stever@hiltonheadislandsc.gov" <stever@hiltonheadislandsc.gov>, "brianh@hiltonheadislandsc.gov" <brianh@hiltonheadislandsc.gov>, "gregg@alfordlawsc.com" <gregg@alfordlawsc.com>, "davidb@hiltonheadislandsc.gov" <davidb@hiltonheadislandsc.gov>, David Ames <amesco@earthlink.net>, "pbrowning@postandcourier.com" <pbrowning@postandcourier.com>, Scott Brandon <SBrandon@thebrandonagency.com>, Beverly Shelly <bshelley@scprt.com>, "eriggs949@gmail.com" <eriggs949@gmail.com>, jgruber@bcgov.net, Linton@WGFLLAW.com, drew laughlin <drew@laughlinandbowen.com>, Steve Birdwell <sbirdwell@seapines.com>, pruett.john.s@gmail.com, dlauderdale@islandpacket.com, "Kesmodel, David" <David.Kesmodel@wsj.com>, Barrett Brewer <BBrewer@clawsonandstaubes.com>

Subject: Re: New 100 k cash reward offered by Skip Hoagland !!!!!!To anyone who provides info leading to the arrest, conviction and imprisonment of any local official, school employee, Chamber employee and local lawyer tied to this corruption

Chris, I founded and build a company involved in technology. Your email was perfect. If I was a crook, I would be scared to death. You are right, no escape for any of the people that I and other honest hard working tax payers want to see justice served on. The list is long and the recent raid by the FBI on Berkeley County Chamber and School CFO and his theft of 386k is just the beginning and tip of the iceberg.

Lets all fight, not fear being vocal to stop SC crimes, by incestuos corrupted crooks and thieves of our tax monies in 2018. We must all attend Town council meetings like I do to not nicely, but harshly criticize our elected officials who continue to allow this unconstitutional misuse and theft of our tax monies. I will

do all the lawsuits and spend the money, I just ask everyone to speak up under your free speech rights.

We need 10 David Pascoes and 100 FBI and IRS agents since we have so much corruption. After Berkeley SC raid by the FBI and first type raid in 100 yrs on these institutions, this will send a loud clear message. Unlike the corrupted incestuos politicians, lawyers with influence even over our judges and SC law enforcement agencies, the federal agencies could care less and have no fear. This is why you saw the the FBI raid on Berkeley, not the local Police dept!

I am convinced the majority of SC Town councils, Town managers, School system administrators, Chamber, Cvb executive directors and city Dmo's will result like Berkeley County SC, with the same and different crimes involved. I am sure many will also result in prison like Berkeley. Only one way to clean the slate, go city by city. We simply do an independent forensic audit conducted by a local FAC (Forensic Audit Committee) made up of local retired CPA's and paid CPA's to do this. Links below explains all on how to audit a school system and a non-profit chamber misusing tens of millions of our tax funds in SC. It's so easy, the FBI and IRS put together a trained team, take the info experts like myself and others provide, and go city by city with this investigation team to work with the local FAC's made up of local CPA's and even the local city and county auditor who would have to cooperate. Start with the largest 3-6 cities in SC and after they all result in some form of waste, theft and corruption being discovered which is certain like Berkeley SC, the rest of the cities in SC will clean up their act in fear of being next.

Also once heads of state agencies like SC PRT, Duane Parrish and SC Terc, Ed Riggs are audited, more wrong doing will be exposed on top of what we already know. 58M for SC Dmo type promotion and all the millions of matching grants to state chambers, CVB's, Dmo's in the tens of millions with zero oversight. I predict our findings will shock this state and all who trusted these institutions for many years. Folks, we have been lied to, cheated, robbed and had fraud committed to us for last 50-100 yrs. Enough is enough!! We are smarter today since the internet was first launched more publicly in 1993 and now have all the information and search tools to clean this all up.

Again, read these important links below, just the intro page will take 5 mins. Let's see what the crooked lawyers think about all this? They won't sue me for calling them all crooked, because they know this will result in depos and discovery.

How to do a School audit:

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

https://www.yankeeinstitute.org/wp-content/uploads/2015/07/Ending-Corruption-and-Waste-In-Your-Public-School.pdf

How to audit a Chamber Cvb Dmo:
https://www.mypalmbeachclerk.com/uploadedFiles/Public_Funds/conv_ctr_audit_report.pdf

The corrupted SC incestuos crooks seem to have no clue every email and text they have ever sent can be accessed by the FBI, IRS and DOJ.

I welcome anyone to see all my emails and text, including my dirty jokes. Dirty funny jokes are not a crime, theft and unconstitutional misuse of public funds and fraud is.

The investigations all needs to start with lawyers of all the crooks and some lawyers also corrupted, like crooked and involved lawyer David Tigges, past Chairman of the chamber, not just the lawyer to immune him. Add the following crooked lawyers:

Crook Gregg Alford, Hilton Head Town lawyer has committed theft, deceit and fraud with our tax monies to enrich his crooked pockets. He is in violation of his Hilton Head Town lawyer contract. What he did was illegal and criminal, yet he is allowed to remain a practicing lawyer?
Crook David Tigges - McNair law firm. Have all info on him and his side kick past lottery commissioner crook Paula Bethea.
Crook Terry Finger - Bluffton Town lawyer, being sued for Foia violations.
Crook David Jennings - Charleston Cvb lawyer lied and refused foia laws. Will be sued and needs fast FBI IRS investigation in fraud, IRS Ubit violations.
Crook Brian Hulbert - Hilton Head Town lawyer schemed with Council, Town employees and Gregg Alford new all about tax money theft.
Weston Newton, lawyer -SCPRT involvement tied, to Bill Herbkersman, and crooked HB 3931.
Tom Davis, lawyer -SCPRT involvement, tied to Bill Herbkersman, and crooked HB 3931.
Crook Drew Laughlin - past Hilton Head Mayor refused to audit Bill Miles - allowed Steve Riley to use tax monies to join Chamber, refused to draft Dmo contract, no procurement, no oversight of Atax funds. Had knowledge of the 4 M past welcome center attempted robbery by Bill Miles, Steve Riley and past Mayor.

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Crook Josh Gruber - Beaufort County lawyer - used the tax monies to join chambers with Gary Kubic. Refuses to draft Dmo contract and put out Dmo job under procurement laws.
Crook Drew Davis - Beaufort Schools lawyer refuses to volunteer to an audit or show detailed audit.
Crook Trenholm Walker - hired by crook Town lawyer Gregg Alford paid with stolen tax money for a private lawsuit.
Crook John Linton Jr - hired by Gregg Alford paid with stolen tax money and knows this.
Crook Robert "Shep" Guyton, the Myrtle Beach attorney and Chamber Chairman who funneled hundreds of thousands of dollars in campaign donations through more than a dozen corporations in 2009, faces 167 state ethics charges, most stemming from excessive contributions to candidates for local and state offices, according to public records.

The list goes on and on and on!!

Bottom line, every lawyer needs to be questioned by the FBI, IRS, Sled and DOJ that represents the crooks in the largest cities where the most money is involved and being unconstitutionally misused.

The biggest corrupted crooked lawyers on this list are Gregg Alford and David Tigges.

I have been given the approval by my supporters to offer a reward for 100k for any info provided that leads to the arrest, conviction and imprisonment of any local Beaufort County official, Chamber employee, School system employee or local lawyer tied to any of this.

On Jan 10, 2018, at 12:58 PM, Philip Branton <zoomru@yahoo.com> wrote:

Skip, Marilyn and all concerned "observers",

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Everyone's efforts and concerns and awareness are highly warranted. The informational flow and dynamics at hand goes beyond the scope being described.
It would be most helpful for everyone concerned to think of these chain of events and historical tax dollar accountability issues as it relates to the IRS and tax law and the Security and Exchange Commission.

How do you stop Al Capone in 2018..?

More laws.....sadly, NO.

Think of the issues and accountability verification that taxpayers and ratepayers expect.
Think of the real issues that Bill Miles and Lawyer David Tigges really face. Think of a Borton retirement..?

It's the actual digital mountain of evidence sitting behind certain servers and remote access at the South Carolina Law Enforcement Division (SLED) that is NOT being divulged. Does anyone here really think that SC Senator Tom Davis has a clue or is informed about his own data or anyone else..?

That is the informational leverage being brought to bear.

Pulling the information from the Beaufort County Chamber of Commerce is only one facet. It is only a portion of data needed and questionably verifiable in a court of law due to the lawyers representing both sides of the informational stream.

Stop and consider the information on Hargrave Communication servers serving Beaufort County alone. Now, think of the statewide server network and consider the oversight implications with respect to the Fusion Center data accountability and its Homeland Security dominoes. Mr. Miles and Mr. Tigges have no real clue how their informational goose is already cooked. Corrupt or not. What do you think will happen when those server records are pulled in support of a class action lawsuit..? The

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

documentation provided will pale in comparison to the data that the NSA will compartmentalize separately from SLED.

That will have seismic results statewide and nationally.

So.....just sit and think....right now as you read this and look at the advertising tracking via yahoo or Comcast or Google or Verizon.

How are these corporate data hives more informed than Tammy Rawl or Mr Keel at SLED about the accounting and oversight and activity of the Beaufort County Chamber of Commerce or the workers in the legal department of the city of Hilton Head Island or Sea Pines..?

It's not scary stuff.....it is just the reality we all live in.

How do you think David Pascoe will use information provided by Rick Quinn or Bobby Harrell or Tammy Rawl to verify accountable actions in any county or city across our state..?

Everyone's actions and concerns and class action awareness is more valuable than anyone is really being told.

Thank you all.....

Chris Branton

Sent from Yahoo Mail on Android

On Wed, Jan 10, 2018 at 11:13 AM, Skip Hoagland <shoagland@me.com> wrote:

> I tried the nice method and just talking for 20 yrs and it did not work. My harsh criticism and lawsuits seem to be working and getting more attention. My facts and info also seemed to result in

9

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

the FBI raid on the Berkeley County SC chamber and School cfo 386k theft. So yes I will stay the course on brash and hard nosed and suggest others do the same. Liars, crooks and thieves of our tax monies will not react to all talk and no action. They will just wait you out until you burn out and go away. Thanks

We must get the Towns involved who secretly used our tax funds to join the chambers and refusing to ask the chambers for access under the non profit corporation act, more corruption. The Packet is a member under past corrupted publisher Sara Borton who is now gone, who censored our local news and harmed this community for 25 yrs.
The Packet seems to have now ended this censorship and reporting the news we all deserve in the community.

Please get other chamber members involved to support Ryan McAvoy who has sued the Hilton head Chamber for access to its financials for members who are essence owners/ investors/ stakeholders. As expected crook Bill miles and Lawyer David Tigges are fighting him, now trying to say he isn't a member. Like me fighting Foia for tax payers. They must be in great fear and have lots to hide spending thousands of tax monies and members dues to lawyers, using the very money of those to hide info from them. This chamber has even refused the membership of a local lawyer and my self. I ask everyone to join and seek this info under the non profit corporation act laws of SC, we will pay your membership to join in the lawsuit with Ryan McAvoy who had the courage to do this like me with no fear of retaliation. It's all free to you, just need your courage and concern to act. This non profit act will negate the need for Foia and HB 3931 being introduced by crook Bill Herbkersman and others supporters like Weston Newton, Tom Davis. This is the most outrageous crooked corrupted House Bill 3931 I have ever seen. I hope they all end up in Prison.Thanks

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jan 10, 2018, at 9:54 AM, Marilyn Bullard <bullardpiwko@aol.com> wrote:

> Mr. Hoagland:
> While some people consider you brash and hard-nosed, others appreciate your determination.
> Surprisingly Mr. Lauderdale agrees with your assessment of the recent
> proposed Bill H.'s faux transparency bill regarding public funds to private organizations.
> So you are making progress for truth and Transparency.
> While I appreciate the Packets efforts, much more needs to be exposed on the Chamber along with how the feel good description of School Choice is hiding a trend towards White Flight for White Majority Schools in Bluffton, with the Supt and majority school board upping higher classroom capacity in 2016 to accommodate more choice students and now wanting a money referendum to add more classrooms to these schools to encourage more of this choice program. The school district will never admit to this type of racial segregation or that the logistics of this school district cannot provide the same educational choice opportunities for all students.
> Regards,
> Lyn Piwko Bullard
> Sent from my iPhone

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Vicki Allison

From: Gregg Alford
Sent: Friday, January 12, 2018 12:11 PM
To: vicki@alfordlawsc.com
Subject: FW: Skip hoagland demands that federal and state authorities get involved in the 200k theft of tax funds by Hilton head Lawyer Gregg Alford and Kim Likins

Gregory M. Alford
Alford Law Firm, LLC
P.O. Drawer 8008
Hilton Head Island, SC 29938
(843) 842-5500
(843) 842-8400 fax

CONFIDENTIALITY NOTE: THE INFORMATION CONTAINED IN THIS ELECTRONIC MAIL TRANSMISSION IS LEGALLY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING THIS ELECTRONIC MAIL MESSAGE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS ELECTRONIC MAIL IN ERROR, PLEASE ACCEPT OUR APOLOGIES AND IMMEDIATELY DELETE IT, AS WELL AS NOTIFYING US OF THE ERROR BY REPLYING TO THIS ELECTRONIC MAIL OR CALL US AT 843-842-5500.

From: CC Hoagland [mailto:skiphoagland@yahoo.com]
Sent: Friday, January 12, 2018 11:16 AM
To: Barrett Brewer; Paul Porter; bstevenson@clawsonandstaubes.com; Matt Adkins; Taylor@harrisonfirm.com; Russ Keep; Kody Krueger; John Crangle; gregg@alfordlawsc.com; Linton@WGFLLAW.com; peter@mediafeedia.com; edukes@lcre.com; mdukes@bcgov.net; William G. Bill Herbkersman; tdavis@harveyandbattey.com; Weston Newton; jeffbradley@schouse.gov; KimL@hiltonheadislandsc.gov; davidb@hiltonheadislandsc.gov; Barrett Brewer; Thenerve.org Rick; Will Folks; david@myrtlebeachsc.com
Cc: Adon Trombley; Pete Logan; FBI George Graves FBI George Graves; Attorney General Alan Wilson Attorney General Allan Wilson; Sled Paul Grant Sled Paul Grant; Sled Paul Grant Sled Paul Grant; shamm@ethics.sc.gov; mburchstead@ethics.sc.gov; dpascoe@scsolicitor1.org; brogers@scpress.org; Jay Bender; peter@mediafeedia.com; marksanford99@gmail.com; Tim Scott; Lee Bright
Subject: Skip hoagland demands that federal and state authorities get involved in the 200k theft of tax funds by Hilton head Lawyer Gregg Alford and Kim Likins

Did Likins pay Irs income tax on the theft of 200k in public tax monies she and her crooked lawyer Gregg Alford schemed to steal, use illegally and criminally, to sue a citizen for Ms. Likins private lawsuit use. I might add to profit both their crooked pockets and other 3 party outside lawyers being paid by this stolen money, which they know is stolen. Further how does Gregg Alford Answer to his scheme to call this a Town loan, like a bank???? No interest rate? No federal or state laws/ licenses to allow a Town government to be a bank and compete with private banks?? Worse bank funded by tax payers unlimited tax monies? No collateral? No document on how the money will be paid back ? This is about as criminal and insane as it gets.

I am a watch dog who exposes corruption in SC, I be damned if I will allow anyone to make me a muzzled guilty dog. Likins is not the only case, I have more and many tied to this case, am I to believe I will accept to be gagged and muzzled in this case and all the others connected? Judge Dukes cced who was forced to get off my case, related to Ed Dukes who voted to kick me out of the Beaufort chamber. Both related to lawyers Weston

Newton and Wes jones, who I have ties to the Hilton head chamber and Bill Herbkersman corrupt HB 3931. I have much more on the tentacles of sc incestuos corruption. Now Judge Dukes has been assigned A local citizen case for a lawsuit against the Town of Hilton head for the 200k theft tied to my case and federal case I filed. Gregg Alford and Dukes are friends and Judge Dukes must be recused from this case !!! Many questions? Ed Dukes kicking me out of chamber many questions?

Let's be clear it's Cathy and I who have been damaged by this criminal 200 k tax paid lawsuit not Kim Likins. Our 50 yr perfect insurance record has been destroyed and policy canceled and not renewed as of Feb 1 2018. No one will insure us and we are left uninsurable and Cathy open to be financially being destroyed by other crooked SC lawsuits. Cathy and I do not break laws and never have. I fight corruption not cause corruption.

Kim Likins defamed herself by lying, deceit, disrespect and conflicts and approving a corrupted chamber Dmo contract she knew was corrupted, 100k app she new only cost 30k and was told by her own Atax Committee and Local experts. She facilitated and allowed as a local official, who was elected to approve, spend and protect tax funds like her own, the unconstitutional misuse and theft of our tax monies to our local chamber and new it. I just exposed it all, when others for the last 50 yrs refused out of fear to speak up. Imagine now they the criminals, want to gag/muzzle me the innocent look guilty, and if they win, no other citizen will ever speak up again out of fear in being wiped out by lawsuits against them by their own government, like has been happening to Cathy and I.

We need, and I have been saying this for a long time authorities involved, as this has gone beyond the lawyers, judges and legal system, as no one is trained or knows how to deal with this without law enforcement involved. If this is in fact an illegal criminal theft, then this is a law enforcement issue, not a lawyer issue.

I ask someone to file this criminal act with the state and federal authorities. I do not know what exactly what law enforcement entities would get involved. Seems we have a little of each and even Irs for tax evasion, federal for the attempt to be a bank with no right, regulations or license to do so, and the theft of 200 of tax payers funds, I caught by a Foia that the crook Town manager Steve Riley signed the checks on, and Gregg Alford Town council Lawyer and Brian Hulbert Town Lawyer was involved in scheming in behalf of the entire town council and Mayor. They have gotten away with anything they wanted to do for 50 yrs and did not expect to get caught in this tax money theft and unconstitutional misuse of public funds. They now need to face the law, not the lawyers who have no authority. I want my 4500 back from Judge Dukes who schemed with Gregg Alford to do the first Gag order against me. I want to know what pocket that 4500
Check Cathy wrote to Gregg Alfords law firm ended up. I want it all investigated from A to Z. I repeat I don't create corruption, I fight corruption.

I have done more than most citizens and lawyers have in many ways to help change laws and clean up this state. I have provided info to help all law enforcement on what and how to identify crimes being committed by many institutions in this state and non profits like chambers, CVBS , city Dmos , School Boards, ScPrt, SC Terc, Town managers, Town Lawyers , School Superintendents, Judges, etc.

Until we all start to force full compliance to transparency with independent forensic audits, and combined with FBI investigations when warranted, like Berkeley SC , the theft, embezzlement, fraud and unconstitutional misuse of tax funds will continue. I once again share these links below that guide us all on what needs to be done and how to do the audits, what to look for and how to introduce local and state laws that independently audit all those who control, issue and receive millions in our tax funds. The wheel has been created, we just need to enforce and implement the procedures. Folks we are being robbed blind of tens of millions and it must end and can easily end with just setting up independent FACS (Forensic Audit Committees) in every city with local retired and working CPAs. The link explains all on how to do this. We need a HB 3931 drafted with all this included to force true transparency, not SC style transparency. We must stop the crooks from hiring their own cookie cutter financial audits that are not by design done to catch fraud, theft and embezzlement, and

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

accept these heads of our SC institutions just handing their audit to us all, and saying here is our independent audit and as you can see all is ok. This is a lie and fraud on the highest level and Berkeley county SC, Jim Merrill, Palm Beach Forensic Audit proves this. I have many other examples of forced forensic audits on these hired audits that have proved this. In fact not one time in the history of SC or USA has a forensic audit been done or an FBI raid conducted on an institution or leader like Bill miles, Helen Hill, Brad Dean, Jeff Moss who refused to be audited, refused Foia laws and non profit corporation act laws, where wrong doing was discovered and prison the result most of the time.

Mr Pascoe I have Helen Hill in Charleston tied to Jim Merrill and now have many others as well
All the way to the top of this state.

Rep.Herbkersman needs investigation as others tied to him for his recent introduction of HB 3931 and tie in to SC Prt, Helen Hill, Jim Merrill and more. I have many people in this state names and how they are tied to corruption and ready to provide all to authorities. Add my two favorites Lawyer David Tigges Chairman of McNair law firm and Paula Bethea past lottery commissioner. Yes Ted Pitts SC chamber and others.

Russ I need you to get Judge Dukes recused off this case filed by Peter B immediately.

I am ready for a wide open war with everyone involved. This is out of the lawyers hands and Judges and must be now be controlled by state and federal authorities.

https://www.yankeeinstitute.org/wp-content/uploads/2015/07/Ending-Corruption-and-Waste-In-Your-Public-School.pdf

https://www.mypalmbeachclerk.com/uploadedFiles/Publications/Alerts/alert_dec06_auditor.pdf

https://www.mypalmbeachclerk.com/uploadedFiles/Public_Funds/conv_ctr_audit_report.pdf

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

E-Mail #5

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

Vicki Allison

From: Gregg Alford
Sent: Friday, January 12, 2018 8:56 AM
To: Vicki allison
Subject: Fwd: New 100 k cash reward offered by Skip Hoagland !!!!!!To anyone who provides info leading to the arrest, conviction and imprisonment of any local official, school employee, Chamber employee and local lawyer tied to this corruption

Pls print

Gregory M. Alford
Alford Law Firm, LLC
18 Executive Park Rd., Bldg. 1
P.O. Drawer 8008
Hilton Head Island, SC 29938
(843) 842-5500

Begin forwarded message:

From: Skip Hoagland <shoagland@me.com>
Date: January 11, 2018 at 6:34:55 PM EST
To: Linton@WGFLLAW.com, gregg@alfordlawsc.com, Barrett Brewer <BBrewer@clawsonandstaubes.com>, bstevenson@clawsonandstaubes.com
Subject: Fwd: New 100 k cash reward offered by Skip Hoagland !!!!!!To anyone who provides info leading to the arrest, conviction and imprisonment of any local official, school employee, Chamber employee and local lawyer tied to this corruption

Let me be clear I did not say Kim Likins was a danger to children and I did not say I will donate money as a rich guy if you fired Kim Likins. I am in fact a poor retired man and never told anyone I was rich. These are made up sick twisted and fabricated lies by Linton and Alford and their lying clients in desperate attempt to try and paint me in a bad light to the jury to win, silence my fight to force transparency in our government in behalf of all tax payers, including the jury who will hear this case. These lies were done to try and further profit your crooked corrupted pockets using tax monies for your clients private frivolous slander case. Everything I said about Kim Likins and anyone else is true. You can not provide one email, phone recording, or a third party individual who would ever say I said this. I would take a polygraph test and ask you do the same.

The lawyers involved in all this are using tax monies to line their pockets that was and is an illegal criminal act and far worse than my speeches and harsh criticism as a concerned citizen.

I did say, I or someone should beat your brains out to Crook Gregg Alford, after he shot me a bird / Finger close to his chest when no one was looking to antagonize me. I find it outrageous a lawyer would do this in a deposition . Why else would me or anyone have this type of mad knee jerk response out of the blue for no reason. No one I know would tell you I would say or do this. This was a man's football field, Hockey game or any other sport type fight response with the other team . I regret I let this corrupted crook thief Lawyer of tax payers money caused me to say this. However for his crimes and theft of 200k in tax monies and coaching others to lie for him, he should be disbarred and put in prison. Send this to the Judge and read aloud to the jury.

1

I am simply a retired man, giving back to society in my retirement. I founded 2 watch dog groups trying to force transparency by our local officials who have failed us. I fight for all tax payers including this jury. At 70 yrs old I do not lie, and I do not need to lie or gain from doing so. I fight corruption I don't cause corruption. If any jury rules against me, they are ruling against themselves, as no one will step up like I have ever again to fight for all tax payers, and the crooks will win and go back to unconstitutionally misusing and stealing our tax money.

This lawsuit using stolen tax monies against me should have never been allowed to even get this far and should have been tossed out of court. By allowing it to proceed by SC judges has caused many damages to my wife and I and will address all this in a court of law.

I have much more to say but will stop here.

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

Begin forwarded message:

From: Skip Hoagland <shoagland@me.com>
Date: January 11, 2018 at 5:51:15 PM EST
To: "zoomru@yahoo.com" <zoomru@yahoo.com>, gregg@alfordlawsc.com, david tigges <dtigges@mcnair.net>, JohnM@hiltonheadislandsc.gov, bill miles <bmiles@hiltonheadisland.org>
Cc: Marilyn Bullard <bullardpiwko@aol.com>, Ryan McAvoy <mcavoylegend@gmail.com>, Brian Tolley <btolley@islandpacket.com>, "dpascoe@scsolicitor1.org" <dpascoe@scsolicitor1.org>, Sled Paul Grant Sled Paul Grant <mkeel@sled.sc.gov>, Attorney General Alan Wilson Attorney General Allan Wilson <AWilson@scag.gov>, "shamm@ethics.sc.gov" <shamm@ethics.sc.gov>, "mburchstead@ethics.sc.gov" <mburchstead@ethics.sc.gov>, "jbagnall@ethics.sc.gov" <jbagnall@ethics.sc.gov>, "brogers@scpress.org" <brogers@scpress.org>, Jay Bender <jbender@brblegal.com>, "jwiendl@sonesta.com" <jwiendl@sonesta.com>, Duane Parrish <dparrish@scprt.com>, "William G. Bill Herbkersman" <schsdistrict118@aol.com>, "tdavis@harveyandbattey.com" <tdavis@harveyandbattey.com>, Weston Newton <wnewton@jsplaw.net>, "jeffbradley@schouse.gov" <jeffbradley@schouse.gov>, "lsulka@townofbluffton.com" <lsulka@townofbluffton.com>, "KimL@hiltonheadislandsc.gov" <KimL@hiltonheadislandsc.gov>, Terry Finger <tfinger@fingerlaw.com>, Marc Frey <mfrey@freymedia.com>, gerard mahieu <gerardmahieu@aol.com>, Liz Farrell <efarrell@islandpacket.com>, Jim Bequette <jwbterp@aol.com>, rick caporale <rcaporale@bcgov.net>, Josephine A Orischak <Josephine.Orischak@beaufort.k12.sc.us>, Covert Michael <mcovert@bcgov.net>, Stern Allan <spiker149@hargray.com>, Don Brashears <Tmbdab@aol.com>, Auditor <auditor@bcgov.net>, "s. fobes" <sfobes@bcgov.net>, Tom Davis <tom@senatortomdavis.com>, Deann Komanecky <deann.komanecky@blufftontoday.com>, Tonya V Crosby

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP702937

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

<tonya.crosby@beaufort.k12.sc.us>, "<info@windrunnerstables.com>" <info@windrunnerstables.com>, Christina S Gwozdz <christina.gwozdz@beaufort.k12.sc.us>, Wilbur M Payne <wilbur.payne@beaufort.k12.sc.us>, Tim Scott <joe_mckeown@scott.senate.gov>, Taylor Smith <taylor@harrisonfirm.com>, Giles Hall <usn1066@gmail.com>, Earl Campbell <earl.campbell@beaufort.k12.sc.us>, David R Striebinger <david.striebinger@beaufort.k12.sc.us>, David Williams <dwilliams@sled.sc.gov>, Joseph R Dunkle <joseph.dunkle@beaufort.k12.sc.us>, Lisa Gibson <lgibson@scag.gov>, Robyn L Cushingberry <Robyn.Cushingberry@beaufort.k12.sc.us>, REBECCA BASS <muttleycrew2008@gmail.com>, John Crangle <johncrangle2@gmail.com>, Staff <contact@Beaufortwatchdog.org>, Joan Deery <jdpc@hargray.com>, Cynthia W Gregory <cynthia.gregory@beaufort.k12.sc.us>, "shannonerickson@schouse.org" <shannonerickson@schouse.org>, Alden Bauer <aldenbauer706@gmail.com>, Jiaco <jiaco@bellsouth.net>, Cnrgbr <cnrgbr@hargray.com>, Sled Paul Grant Sled Paul Grant <pgrant@sled.sc.gov>, Kelly Meyerhofer <kmeyerhofer@islandpacket.com>, "s. rodman" <srodman@bcgov.net>, brian flewelling <brianf@bcgov.net>, "g. dawson" <gdawson@bcgov.net>, Jennifer A Staton <jennifer.staton@beaufort.k12.sc.us>, Jerry Stewart <jstewart@bcgov.net>, Mark Sanford <marksanford99@gmail.com>, "michaelrivers@schouse.gov" <michaelrivers@schouse.gov>, Richard Gregory <rgregory@sled.sc.gov>, fran bisi <eyelandart@yahoo.com>, Geraldine C Kinton <Geraldine.Kinton@beaufort.k12.sc.us>, Jerry at the Beach <gringoviejotwo@yahoo.com>, Ami Franklin <ami@ethics.sc.gov>, "Thenerve.org Rick" <rbrundrett@islandpacket.com>, Mary M Cordray <mary.cordray@beaufort.k12.sc.us>, John Dowling <dowlingjohn287@gmail.com>, "peter@mediafeedia.com" <peter@mediafeedia.com>, Will Folks <will.folks@gmail.com>, "david@myrtlebeachsc.com" <david@myrtlebeachsc.com>, David Lauderdale <letters@islandpacket.com>, Alex Kinkaid <akincaid@islandpacket.com>, Jeremia Froyland <jeremiafroyland@gmail.com>, Art Davis <art@globallylocally.com>, "josh.metnick@gmail.com" <josh.metnick@gmail.com>, "susan@surfcityusa.com" <susan@surfcityusa.com>, "stever@hiltonheadislandsc.gov" <stever@hiltonheadislandsc.gov>, "brianh@hiltonheadislandsc.gov" <brianh@hiltonheadislandsc.gov>, "gregg@alfordlawsc.com" <gregg@alfordlawsc.com>, "davidb@hiltonheadislandsc.gov" <davidb@hiltonheadislandsc.gov>, David Ames <amesco@earthlink.net>, "pbrowning@postandcourier.com" <pbrowning@postandcourier.com>, Scott Brandon <SBrandon@thebrandonagency.com>, Beverly Shelly <bshelley@scprt.com>, "eriggs949@gmail.com" <eriggs949@gmail.com>, jgruber@bcgov.net, Linton@WGFLLAW.com, drew laughlin <drew@laughlinandbowen.com>, Steve Birdwell <sbirdwell@seapines.com>, pruett.john.s@gmail.com, dlauderdale@islandpacket.com, "Kesmodel, David" <David.Kesmodel@wsj.com>, Barrett Brewer <BBrewer@clawsonandstaubes.com>

Subject: Re: New 100 k cash reward offered by Skip Hoagland !!!!!!To anyone who provides info leading to the arrest, conviction and imprisonment of any local official, school employee, Chamber employee and local lawyer tied to this corruption

Chris, I founded and build a company involved in technology. Your email was perfect. If I was a crook, I would be scared to death. You are right, no escape for any of the people that I and other honest hard working tax payers want to see justice served on. The list is long and the recent raid by the FBI on Berkeley County Chamber and School CFO and his theft of 386k is just the beginning and tip of the iceberg.

3

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Lets all fight, not fear being vocal to stop SC crimes, by incestuos corrupted crooks and thieves of our tax monies in 2018. We must all attend Town council meetings like I do to not nicely, but harshly criticize our elected officials who continue to allow this unconstitutional misuse and theft of our tax monies. I will do all the lawsuits and spend the money, I just ask everyone to speak up under your free speech rights.

We need 10 David Pascoes and 100 FBI and IRS agents since we have so much corruption. After Berkeley SC raid by the FBI and first type raid in 100 yrs on these institutions, this will send a loud clear message. Unlike the corrupted incestuos politicians, lawyers with influence even over our judges and SC law enforcement agencies, the federal agencies could care less and have no fear. This is why you saw the the FBI raid on Berkeley, not the local Police dept!

I am convinced the majority of SC Town councils, Town managers, School system administrators, Chamber, Cvb executive directors and city Dmo's will result like Berkeley County SC, with the same and different crimes involved. I am sure many will also result in prison like Berkeley. Only one way to clean the slate, go city by city. We simply do an independent forensic audit conducted by a local FAC (Forensic Audit Committee) made up of local retired CPA's and paid CPA's to do this. Links below explains all on how to audit a school system and a non-profit chamber misusing tens of millions of our tax funds in SC. It's so easy, the FBI and IRS put together a trained team, take the info experts like myself and others provide, and go city by city with this investigation team to work with the local FAC's made up of local CPA's and even the local city and county auditor who would have to cooperate. Start with the largest 3-6 cities in SC and after they all result in some form of waste, theft and corruption being discovered which is certain like Berkeley SC, the rest of the cities in SC will clean up their act in fear of being next.

Also once heads of state agencies like SC PRT, Duane Parrish and SC Terc, Ed Riggs are audited, more wrong doing will be exposed on top of what we already know. 58M for SC Dmo type promotion and all the millions of matching grants to state chambers, CVB's, Dmo's in the tens of millions with zero oversight. I predict our findings will shock this state and all who trusted these institutions for many years. Folks, we have been lied to, cheated, robbed and had fraud committed to us for last 50-100 yrs. Enough is enough!! We are smarter today since the internet was first launched more publicly in 1993 and now have all the information and search tools to clean this all up.

Again, read these important links below, just the intro page will take 5 mins. Let's see what the crooked lawyers think about all this? They won't sue me for calling them all crooked, because they know this will result in depos and discovery.

How to do a School audit:
https://www.yankeeinstitute.org/wp-content/uploads/2015/07/Ending-Corruption-and-Waste-In-Your-Public-School.pdf

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

How to audit a Chamber Cvb Dmo:
https://www.mypalmbeachclerk.com/uploadedFiles/Public_Funds/conv_ctr_audit_report.pdf

The corrupted SC incestuos crooks seem to have no clue every email and text they have ever sent can be accessed by the FBI, IRS and DOJ.

I welcome anyone to see all my emails and text, including my dirty jokes. Dirty funny jokes are not a crime, theft and unconstitutional misuse of public funds and fraud is.

The investigations all needs to start with lawyers of all the crooks and some lawyers also corrupted, like crooked and involved lawyer David Tigges, past Chairman of the chamber, not just the lawyer to immune him. Add the following crooked lawyers:

Crook Gregg Alford, Hilton Head Town lawyer has committed theft, deceit and fraud with our tax monies to enrich his crooked pockets. He is in violation of his Hilton Head Town lawyer contract. What he did was illegal and criminal, yet he is allowed to remain a practicing lawyer?
Crook David Tigges - McNair law firm. Have all info on him and his side kick past lottery commissioner crook Paula Bethea.
Crook Terry Finger - Bluffton Town lawyer, being sued for Foia violations.
Crook David Jennings - Charleston Cvb lawyer lied and refused foia laws. Will be sued and needs fast FBI IRS investigation in fraud, IRS Ubit violations.
Crook Brian Hulbert - Hilton Head Town lawyer schemed with Council, Town employees and Gregg Alford new all about tax money theft.
Weston Newton, lawyer -SCPRT involvement tied, to Bill Herbkersman, and crooked HB 3931.
Tom Davis, lawyer -SCPRT involvement, tied to Bill Herbkersman, and crooked HB 3931.
Crook Drew Laughlin - past Hilton Head Mayor refused to audit Bill Miles - allowed Steve Riley to use tax monies to join Chamber, refused to draft Dmo contract, no procurement, no oversight of Atax funds. Had knowledge of the 4 M past welcome center attempted robbery by Bill Miles, Steve Riley and past Mayor.
Crook Josh Gruber - Beaufort County lawyer - used the tax monies to join chambers with Gary Kubic. Refuses to draft Dmo contract and put out Dmo job under procurement laws.
Crook Drew Davis - Beaufort Schools lawyer refuses to volunteer to an audit or show detailed audit.
Crook Trenholm Walker - hired by crook Town lawyer Gregg Alford paid with stolen tax money for a private lawsuit.
Crook John Linton Jr - hired by Gregg Alford paid with stolen tax money and knows this.
Crook Robert "Shep" Guyton, the Myrtle Beach attorney and Chamber Chairman who funneled hundreds of thousands of dollars in campaign donations through more than a dozen corporations in 2009, faces 167 state ethics charges, most stemming from excessive contributions to candidates for local and state offices, according to public records.

5

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

The list goes on and on and on!!

Bottom line, every lawyer needs to be questioned by the FBI, IRS, Sled and DOJ that represents the crooks in the largest cities where the most money is involved and being unconstitutionally misused.

The biggest corrupted crooked lawyers on this list are Gregg Alford and David Tigges.

I have been given the approval by my supporters to offer a reward for 100k for any info provided that leads to the arrest, conviction and imprisonment of any local Beaufort County official, Chamber employee, School system employee or local lawyer tied to any of this.

On Jan 10, 2018, at 12:58 PM, Philip Branton <zoomru@yahoo.com> wrote:

> Skip, Marilyn and all concerned "observers",
>
> Everyone's efforts and concerns and awareness are highly warranted.
> The informational flow and dynamics at hand goes beyond the scope being described.
> It would be most helpful for everyone concerned to think of these chain of events and historical tax dollar accountability issues as it relates to the IRS and tax law and the Security and Exchange Commission.
>
> How do you stop Al Capone in 2018..?
>
> More laws.....sadly, NO.
>
> Think of the issues and accountability verification that taxpayers and ratepayers expect.
> Think of the real issues that Bill Miles and Lawyer David Tigges really face. Think of a Borton retirement..?
>
> It's the actual digital mountain of evidence sitting behind certain servers and remote access at the South Carolina Law Enforcement Division (SLED) that is NOT being divulged. Does anyone here really think that SC Senator Tom Davis has a clue or is informed about his own data or anyone else..?

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Exhibit "C"

ELECTRONICALLY FILED - 2018 Jan 16 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

Page 17

fortune top 100 company, I was in senior management for 34 years. I was a Navy Officer, and I had not received a phone call like that; not anywhere close.

Q Do you remember any of the details of what he told you?

A Just a lot of over and over about how she was a liar, how she was unfit for the kids and we needed to fire her. It was that kind of a theme as I recall.

Q Did he provide any facts to substantiate those claims?

A No. I think evidently he had -- as you know Kim Likins is part of the Town Council of the Town of Hilton Head, and from what I gather he was very disturbed, very upset about a contract that she voted in favor of for the Bluffton and Hilton Head Chamber of Commerce. And so that is my impression he was talking about that. He just felt very, very strongly about what he was saying and was very vocal about it.

Q That information about him being upset that she had not voted the way he wanted her to, did you get that from your conversation with him

Page 18

on the phone?

MR. BREWER: Objection.

THE WITNESS: I don't remember all of that coming up in the conversation.

MR. BREWER: You can go on. I may object from time to time.

THE WITNESS: That is fine.

MR. ALFORD: Just ignore him and go ahead and answer.

THE WITNESS: Yeah.

I don't remember because to be very candid with you, it was going on a long time, a lot of heavy words about that, you know. I was just taken aback. It was a Friday afternoon as I recall when I received that call. So I don't remember if that came up, or if that was something I realized along the way. I think I was aware. He asked me if I was aware of some things about who he was. I said I knew a little bit about him, but I hadn't followed it that closely.

BY MR. LINTON:

Q What did you know about him?

Page 19

A I saw some things in the press about some things he was going on with the city. I saw a little bit of that along the way. That was what I -- that is what I knew about. I didn't know that much, because I didn't pay that much attention to it.

Q So during the conversation did Mr. Hoagland explain to you why he was telling you that Kim Likins was a liar?

MR. BREWER: Objection.

THE WITNESS: I don't recall what kind of explanation he had, because he had a very strong tone about him. He wanted her fired because he was talking about how much of a liar she was and how unfit and how dangerous it was for our kids, you know, based on -- so I don't remember exactly.

BY MR. LINTON:

Q The same question, but with respect to her being dangerous to be around children.

Were there any -- did he tell you why it was dangerous that she be around children?

A Not that I recall.

Q Do you remember how long the call

Page 20

lasted?

A I don't remember the total amount of time. It was fairly lengthy in terms of at least five, ten minutes. Kind of the same language over and over.

Q What did you say on the call?

A One of the things I said I don't think I -- I would appreciate it if you did not involve the Boys & Girls Club, because I couldn't understand how they would be involved as a nonprofit organization. We have worked hard on this island with the nonprofit organization. I did say that.

Based on everything he was saying I didn't feel it was appropriate for him to be attacking the Boys & Girls Club, because they are not involved in this situation.

Q But why did you feel like the Boys & Girls Club was being attacked?

A Because he wanted her fired and called her a liar. Called her -- when she did not have the ability to relate well with kids, you know, that wouldn't reflect on our donors and everybody else and our donors don't feel that way.

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

STATE OF SOUTH CAROLINA	)	**IN THE COURT OF COMMON PLEAS**
	)	
COUNTY OF BEAUFORT	)	**CIVIL CASE NO.: 2015-CP-07-2937**
	)	
KIM LIKINS	)	
	)	
Plaintiff,	)	
	)	**MOTION FOR ORDER AND/OR RULE TO SHOW CAUSE**
vs.	)	
	)	
C. C. "SKIP" HOAGLAND	)	
	)	
Defendant.	)	

TO: The Defendant and his Attorneys named above:

YOU WILL PLEASE TAKE NOTICE THAT the Plaintiffs shall move before the Court within 10 days or as soon thereafter as the Court may provide for an Order and/or Rule to Show Cause requiring Defendant to appear and show cause as to why he should not be held in civil contempt for failure to Comply with the Court's Order of November 8, 2017. See Ex. A. (Order).

THEREFORE, Plaintiffs do hereby move before this Court on this day, for an ORDER requiring Defendant to **APPEAR** before the Court, at the Beaufort County Courthouse, located at 102 Ribaut Road, Beaufort, South Carolina, as soon as the matter may be heard by the Court to **SHOW CAUSE** why the Defendant should not be held in contempt and sanctioned as deemed appropriate by the Court for violating the Court's Order of November 8, 2017.

Despite the prohibitions of the November 8, 2017 Order, the Defendant has violated the order in the following ways:

1. Directing multiple derisive and abusive comments towards the undersigned counsel for Plaintiff during the course of depositions of witnesses including a threat to "beat your God Damn brains out" prior to the start of a deposition.
2. By sending 9 e-mails with lengthy prior e-mail strings to the undersigned counsel for

Plaintiff (among others). See Ex. B. (copies of e-mails). These e-mails total approximately 126 pages.

Plaintiffs respectfully request that the Court issue a RULE TO SHOW CAUSE and require Defendant to appear and show cause why he should not be held in civil contempt. Plaintiff's counsel hereby certifies that further consultation with opposing counsel regarding this issue would serve no useful purpose.

Respectfully submitted:

ALFORD LAW FIRM, LLC

By: /Gregory M. Alford
Gregory M. Alford (#6932)
Alford Law Firm, LLC
Post Office Drawer 8008
Hilton Head Island, SC 29938
(843) 842-5500 (phone)
(843) 842-8400 (fax)
Attorneys for Plaintiffs

Dated this 4th day of January 2018.
Hilton Head Island, Beaufort County, South Carolina.

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

EXHIBIT "A"

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937
ELECTRONICALLY FILED - 2017 Nov 08 11:54 AM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

STATE OF SOUTH CAROLINA COUNTY OF BEAUFORT Kim Likins, Plaintiff, vs. C. C. Hoagland, Defendant.	IN THE COURT OF COMMON PLEAS FOR THE FOURTEENTH JUDICIAL CIRCUIT CASE NO.: 2015-CP-07-2937 **ORDER PROHIBITNG PRETRIAL COMMUNICATIONS AND PUBLICITY**

This is a defamation case commenced by Plaintiff in her individual capacity against Defendant. Plaintiff is a city council person with the Town of Hilton Head. Nothing contained in this Order shall be construed as a determination of whether Plaintiff will be considered a public official or private individual in this lawsuit.

Because of the posture and history of this case when it was assigned to the undersigned, and based upon the inherent authority of this Court to maintain and preserve the decorum and integrity of Court proceedings and the sanctity of judicial proceedings, the Court finds that it is appropriate and necessary to issue an Order prohibiting the parties, their servants, agents, employees and all others acting at their behest from making, issuing or causing to be uttered any extra-judicial statements or comments about this lawsuit in any form or fashion during the pendency of this case.

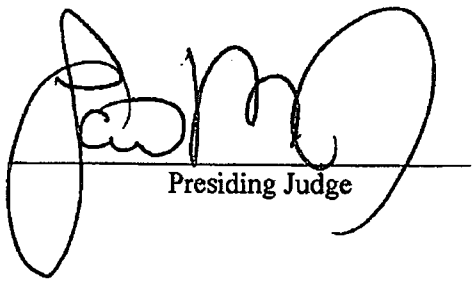
Accordingly it is ordered, adjudged and decreed that:

1. The parties, their attorneys and staff, consulted or retained experts as well as any other servants, agent and/or employees of the above are prohibited from making ANY extra-judicial comments about this case to the media and any third parties about any aspect of this action until a jury verdict has been returned.
2. Nothing contained in this Order is intended to be nor shall be construed as a prior restraint on the media's ability to report on this case.
3. Any and all communications between counsel of record shall be conducted solely by the attorneys and/or their staff. The parties are expressly prohibited from communicating directly or indirectly with or to opposing counsel.[1] Nothing contained in this Order prohibits the parties from responding to opposing counsel's questions posed in deposition(s), answering discovery requests under the guidance of their counsel or participating in any subsequent hearing or trial.

[1] Reportedly, the Defendant has engaged in a pattern of communicating directly with Plaintiff's counsel by E-mail and/or otherwise.

4. This Order is not intended to prohibit legitimate, good faith communications with third parties (excluding the media) in the preparation of this case.
5. Nothing contained in this Order is intended to nor shall abridge any persons affected by this Order ability to exercise their First Amendment rights as long as by doing so they do not contravene the prohibitions contained herein.

It is so ORDERED.



Presiding Judge

November 8, 2017
Anderson, SC

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937
ELECTRONICALLY FILED - 2017 Nov 08 11:54 AM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

EXHIBIT "B"

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702337

Gmail by Google

Gregg Alford <gregg@alfordlawsc.com>

Fwd: Another lawsuit just filed against the secret corrupt Hilton head Chamber for refusing financials to its own members——McAvoy v. Hilton Head Island - Bluffton Chamber of Commerce, Case No. 2017-CP-07-01766 attached

1 message

Skip Hoagland <shoagland@me.com> Tue, Jan 2, 2018 at 9:02 PM
To: JohnM@hiltonheadislandsc.gov, bill miles <bmiles@hiltonheadisland.org>, Sarah Borton Sarah Borton <sgillis@islandpacket.com>, Tom Lennox <toml@hiltonheadislandsc.gov>, WilliamH@hiltonheadislandsc.gov, david tigges <dtigges@mcnair.net>, jwiendl@sonesta.com, gregg@alfordlawsc.com
Cc: fran bisi <eyelandart@yahoo.com>, lsulka@townofbluffton.com, KimL@hiltonheadislandsc.gov, JohnM@hiltonheadislandsc.gov, Cindi Ross Scoppe <cscoppe@thestate.com>, stever@hiltonheadislandsc.gov, david tigges <dtigges@mcnair.net>, bill miles <bmiles@hiltonheadisland.org>, Steve Birdwell <sbirdwell@seapines.com>, jwiendl@sonesta.com, sarah borton <sborton@islandpacket.com>, Cary Corbitt <CCorbitt@seapines.com>, Brad Marra <bmarra@palmettodunes.com>, Duane Parrish <dparrish@scprt.com>, eriggs949@gmail.com, edukes@lcre.com, wegmannj@beaufortlaw.com, Blakely Williams <blakelyw@beaufortsc.org>, Robb@beaufortsc.org, susan@surfcityusa.com, rdeal@hiltonheadisland.org, rwarco@websterrogers.com, bcreech@websterrogers.com, paula@phbethea.com, ted.pitts@scchamber.net, b_fleming@hargray.com, john vann <jvann@bbandt.com>, patricia@facesdayspa.com, bortonb@uscb.edu, jupshaw@uscb.edu, Jeffrey C Moss <Jeffrey.Moss@beaufort.k12.sc.us>, Drew H Davis <drew.davis@beaufort.k12.sc.us>, gregg@alfordlawsc.com, brianh@hiltonheadislandsc.gov, jgruber@bcgov.net, gkubic@bcgov.net, gregd@hiltonheadislandsc.gov, "Tonya V. Crosby" <tonya.crosby@beaufort.k12.sc.us>, Geri Kinton <geri.kinton@beaufort.k12.sc.us>, Orischak Josephine A <josephine.orischak@beaufort.k12.sc.us>, david striebinger <david.striebinger@beaufort.k12.sc.us>, Christina Gwozdz <christina.gwozdz@beaufort.k12.sc.us>, Earl Campbell <earl.campbell@beaufort.k12.sc.us>, Joseph Dunkle <joseph.dunkle@beaufort.k12.sc.us>, Mary Cordray <mary.cordray@beaufort.k12.sc.us>, Wilbur Payne <bill.payne@beaufort.k12.sc.us>, "Jennifer A. Staton" <jennifer.staton@beaufort.k12.sc.us>, Kelly Meyerhofer <kmeyerhofer@islandpacket.com>, Jerry Stewart <jstewart@bcgov.net>, Covert Michael <mcovert@bcgov.net>, rick caporale <rcaporale@bcgov.net>, "s. rodman" <srodman@bcgov.net>, "s. fobes" <sfobes@bcgov.net>, "g. dawson" <gdawson@bcgov.net>, brian flewelling <brianf@bcgov.net>, Frank Schumpert <fschumpert@ethics.sc.gov>, Steven Hamm <shamm@ethics.sc.gov>, John Dowling <dowlingjohn287@gmail.com>, Jerry at the Beach <gringoviejotwo@yahoo.com>, Windrunnerstables Info <info@windrunnerstables.com>, Staff <contact@beaufortwatchdog.org>, Jim Bequette <jwbterp@aol.com>, John Crangle <johncrangle2@gmail.com>, "Thenerve.org Rick" <rbrundrett@islandpacket.com>, Don Brashears <tmbdab@aol.com>, Giles Hall <usn1066@gmail.com>, Tom Davis <tom@senatortomdavis.com>, Jiaco <jiaco@bellsouth.net>, Sled Paul Grant Sled Paul Grant <mkeel@sled.sc.gov>, Liz Farrell <efarrell@islandpacket.com>, Attorney General Alan Wilson Attorney General Allan Wilson <awilson@scag.gov>, Stern Allan <spiker149@hargray.com>, Alden Bauer <aldenbauer706@gmail.com>, Auditor <auditor@bcgov.net>, Joan Deery <jdpc@hargray.com>, Mark Sanford <marksanford99@gmail.com>, Ami Franklin <ami@ethics.sc.gov>, Tim Scott <joe_mckeown@scott.senate.gov>, Michael Rivers <michaelrivers@schouse.gov>, Jeff Bradley <jeffbradley@schouse.gov>, Michael Burchstead <mburchstead@ethics.sc.gov>, Phillip Branton <zoomru@yahoo.com>, Deann Komanecky <deann.komanecky@blufftontoday.com>, Richard Eckstrom <reckstrom@cg.sc.gov>, Richard Gregory <rgregory@sled.sc.gov>, Jimmy Bagnall <jbagnall@ethics.sc.gov>, David Lauderdale <dlauderdale@islandpacket.com>, Liz Farrell <lfarrell@islandpacket.com>, "Thenerve.org Rick" <rick.brundrett@gmail.com>, Will Folks <will.folks@gmail.com>, davidb@hiltonheadislandsc.gov, Trish Heichel <trilar3@aol.com>, Barrett Brewer <BBrewer@clawsonandstaubes.com>, srawls@clawsonandstaubes.com, tvaux@bcgov.net, "William G. Bill Herbkersman" <schsdistrict118@aol.com>, tompeeples@aol.com, Weston Newton <wnewton@jsplaw.net>, tdavis@harveyandbattey.com, John Keener <john@charlestoncrabhouse.com>, psommerville@bcgov.net, Lee Edwards <leeedwards@thegreeneryinc.com>, Lee Bright <Lee@brightagencyinc.com>, drew laughlin <drew@laughlinandbowen.com>, Michael Gottdenker <michael.gottdenker@htc.hargray.com>, Cynthia Bensch <bensch@hargray.com>, tmoss@islandpacket.com, Gina Smith <gsmith@islandpacket.com>, "Gillis, Sandy" <sgillis@islandpacket.com>, David Lauderdale <letters@islandpacket.com>, Brian Tolley <btolley@islandpacket.com>, chris hendricks <chendricks@mcclatchy.com>, Alexandra Villoch <avilloch@miamiherald.com>, "Fitzpatrick, David" <dfitzpatrick@mcclatchyinteractive.com>, chris@hickspub.com, david@myrtlebeachsc.com, David Ames <amesco@earthlink.net>

This Town council and the Island Packet newspaper are both Chamber members and choose to do nothing for transparency. Shame on all of you this past year.

Thanks for citizens like Ryan McAvoy, who are willing to stand up and do your job to force transparency. What is wrong with you people to keep allowing theft by Bill Miles to tens of millions of our tax monies and IRS Ubit violations and many other crimes connected. Think about what you each were hired and elected to do as you spend time with your family this holiday season. Secrecy, non transparency and accountability with our tax funds and members dues must end.

Town council members John McCann, Bill Harkins and Tom Lennox all lied when they said they saw the chamber books at the chamber offices with corrupt lying Bill Miles. Imagine to try and keep hiding theft of chamber member dues and Atax funds, Bill Miles and his crook puppet Chairman Jay Weindl of the Sonesta Resort and David Tigges Chairman of McNair Law firm are now trying to say Ryan McAvoy is not a member, when he has proof he is.

Sara Borton - was she fired or retired? Makes no difference, good news she is gone. She harmed this island for 25 yrs with her ties to local corruption, big advertisers, and censorship of important news on corruption. Sara Bortons', husband Brett Borton, was tied to the massive corruption of the LCGOA tied to Bill Miles, Cary Corbit, Brad Marra and others. They all schemed on putting a local publisher out of business. Let's hope the Island Packet will replace Sara Borton with a publisher that does not fear and can not be controlled by local corrupt power and big advertisers. We need wide open local reporting, our community deserves this.

The local corruption has many tentacles that I have great knowledge of after watching all this corruption by many crooks for 40 yrs.

I guess all our council is going to the chamber ball to drink crooks and thieves Bill miles, David Tigges, Paula Bethea Koolade and wine and dine on tax payers dime, since crook and thief Steve riley stole our tax money to join as a town member with his crook buddy Bill miles to make sure he can pay his 400k
Salary and trips to China. Crook Lawyer David Tigges calls the Chamber Ball the annual meeting of chamber owners and investors. You are all be robbed blind.

Happy non corrupt New Year.

Attachment: Filed Summons & Complaint.pdf
Attachment: Filed Exhibits.pdf

Attachment: Request to Produce Computers for Inspection Copying.pdf

Begin forwarded message:

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Sep 2, 2017, at 11:45 AM, Skip Hoagland <shoagland@me.com> wrote:

> Anyone on this email threatened with a defamation lawsuit by Moss or others in an attempt to try and scare and silence you, please let me know.
>
> I also highly suggest if you decide to aggressively fight corruption like me, check your homeowners insurance policy for slander and defamation coverage. If you don't have it, add it asap, its very inexpensive and mine covers me for 3.5m per case.
> This gives me the same financial ability to fight a thief like Kim Likins and her accomplices /co conspirators on Hilton Head Town council who used unlimited tax monies, 200k to date, to sue me for her "private sector"non related Town lawsuit. Note all checks made out to her lawyers were by crook / thief Steve Riley. It was me who discovered this secret theft with a Foia, that they actually confessed to. This shows you not only how incompetent they are, but how crooked. In their crazy lunatic corrupt minds, they actually thought this was ok and legal. Imagine using tax payers money to sue a citizen, passing a illegal town resolution to sue citizens who make speeches under

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

the First Amendment , and then trying to prevent my free speech as a citizen because I lived in Windmill Harbor, unincorporated part of Hilton Head. How in the hell did we end up with so many crooked Baffons in charge and control of our town. We need to elect a full time Mayor in full power control to hire and fire, order audits, pay him 200-250k per year, not a part time Mayor at 30k. This way we can hold one person accountable, versus having to hold 7 responsible.

Fran, the local crooks and liars, like Jeff Moss , who I have addressed this email to, and specifically Part Time Mayor / Full Time Real estate Agent Lisa Sulka, and Part Time Kim Likins, both filed defamation lawsuits against me, claiming mental suffering from my exposure on their actions. So they defamed themselves, not me, I am just the messenger.

This is a desperate attempt by both of them to stop any critic from exposing them and their abuse of power, corruption and lies. The trial dates will be announced. I especially want as many people as possible to show up for the Kim Likins frivolous 200k tax payer paid spectacle.

Let's see if a jury will find Skip Hoagland guilty who fights for the Jury and all tax payers to expose and force transparency and award Ms likins and her thieving lawyers 3.5 m so they can buy a new mercedez funded by tax monies. Will be very interesting.

What these crooks don't understand is regardless of the outcome of any lawsuits, my plan is to carry this forward, send more emails, make more public speeches about Likins and Sulka the following day, addressing them individually at Town hill on what they did, and filing more lawsuits as need be. They can keep filing as many defamation lawsuits as they wish for next 20yrs, or death due us part. The question for crooks is how do they and the legal system stop a person like me from exposing corruption who has unlimited insurance funds at his disposal? I don't think they planned for this! They also did not plan for being caught stealing 200k in tax monies.

All crooks and their crooked lawyers are not dealing with someone they are used to dealing with. Plus I am a Florida resident and they will need to come to Florida and deal with me here versus corrupt, incestuos, secret, criminal, backwards SC in the future. I highly suggest the crooked lawyers find a good lawyer in Florida or get licensed there.

Lunatics Lisa Sulka and lawyer Terry Finger, even went as far to put up rules on how you could speak on a projector, on what you could say or not say. Imagine the mental state of this woman Sulka, and her lawyer removing a citizen making a professional civil speech with police from Bluffton Town hall, for simply exposing her lies and crimes? She told newspaper reporters, that the police removed me on their own free will, tossing her own police under the bus, when in fact the police report says she ordered the removal.
Imagine, now she says her defamation lawsuit is for mental suffering from the abuse I exposed on her. Again like her buddy Likins defamed herself, not me. She needs to be booted as Mayor as unfit, needs to be investigated by the FBI, as well as Marc Orlando Town manager, Terry Finger lawyer, and all need to be forensically audited, along with crook liar Jeff Moss, Bill Miles, Steve Riley and Gary Kubic and anyone else suspected of wrong doing, who controls all our tax funds.

I am counter suing for 10m in federal court against all Hilton Head council members for this illegal 200k lawsuit filed by Kim Likins. I now understand another tax payer will join my fight and file a separate lawsuit against the Town for in behalf of all tax payers for this 200k tax theft by Kim likins, Gregg Alford Town lawyer and Town manager Steve Riley.

Again FBI and forensic audits are going to end all this eventually, and until that day, the games will continue and the crooks will become even more tangled in their web of incestous corruption and attempts to cover up lies and theft. The end is near for all of them.

Now we have crook / liar buffoon John McCann announcing he will run for Mayor, who is also a flunky puppet for Bill Miles and Steve Riley to assist in robbing us all, he lied saying her saw the chamber accounting, and at the chamber public hearing made a fool
of himself, saying he made up his mind to vote in favor of the chamber contract night before. Now this buffoon announces over a year early that he is running for Mayor. What the hell is this all about?? Who will try and become Mayor next, Lying Likins? Stooge Riley? This man Mcaan has to be totally out of his mind. I guess as a retired part time crook, he has nothing else to do but add another toxic cloud over Hilton Head, or stay at home driving his wife crazy. Imagine we elect this lying fool, and elected everyone else on Hilton Head town council, they all have violated their campaign promises, fully knowing they had no intention of doing so. This is called fraud. So yes, add this to the list, they are all frauds.

What we need is change of our political system asap, get young honest full time Mayors elected with full power to hire, fire and launch forensic audits without majority votes of corrupted councils or boards, or FBI raids. This way if our full time Mayor does not act and honor his campaign promises, and commits fraud like our current elected officials are doing, again we have just one person to hold accountable and can try again 4 yrs later.

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

We need to also elect an honest school board Chairman. I again think this needs to be a full time position. Nothing will ever work well with a part time leader.
We need to empower the county auditor or someone trusted to hire the annual audits, under procurement laws, not the school administration crook Moss. This audit would be fully available under foia to all of us to further verify Reagan principal.

We need an honest Chamber chairman that will have the power to hire the audit of the chamber, not crook employee Bill Miles hired audit. Chairman and board duly elected, not appointed that will have total control over employees. A chamber to act like a real chamber and a separated Cvb, both fully comply to foia laws if any public monies are received, and finally make this audit available to all Chamber members under the SC non profit corporation act laws. The Town must comply to audits of the city Dmo, bid out under procurement laws, oversight with SC prt, Sc Terc. Make sure all funds are used properly under the specific job of a Dmo. Our current Hilton head Chamber is a fraud, commingled hybrid committing theft and misuse, violating Irs Ubit, fair trade business practices and scamming our entire community. Puppet Jay Weidl at Sonesta Resort, David Tigges McNair law firm, Tom and Jane Upshaw, Paula Bethea, Ray deal , Ray Warco and Bobby Creech all need to be FBI IRS investigated and deposed.

I welcome as many of these crooks to sue me for defamation as possible, this will allow me to get access to more discovery and depositions. My goal and sights are getting full access to all the financials one way or the other, until the FBI IRS kicks down their doors like Berkeley county SC and Palm Beach. Again here is the audit that will be forced on Bill miles and his cronies, that will put them all in prison. http://www.mypalmbeachclerk.com/uploadedFiles/Public_Funds/conv_ctr_audit_report.pdf

David Tigges, crook lawyer and Chairman of McNair law firm, now caught secretly representing Steve Riley, is the lawyer for Bill Miles, sits on SC chamber board with flunky liar Ted Pitts, and imagine fighting my transparency Foia lawsuit in the Supreme Court to allow him and thief Bill Miles, to remain secret with all our tax monies and members dues, to keep stealing. My goal for crook Tigges is to not just watch him go to prison with Bill Miles, accountants, Paula Bethea and others, but be disbarred. He does not qualify for a low level job at Wal-mart and even at that you would need the cameras on.

I can assure you once the forensic audits, FBI investigations are done, the least of their problems will be me, and others who are speaking up on all this theft, misuse, fraud, embezzlement and misappropriation.

I can assure you my words will not land me in prison, nor enrich their crooked pockets, their actions will land them in prison. I fight to win, not lose, and will defend myself in ways the crooks have no chance of defeating. The lawyers were not trained in law school to deal with all these issues. They are all over their heads.

Further, even SC judges must be challenged on any attempt to issue gag orders that violate the federal laws under our 1st Amendment rights under the constitution of the United States of America. What we are witnessing on TV is not civilized free speech.

I dare anyone on this email to publicly debate me, deny or challenge me by email back to this entire list of recipients. Anyone who can prove me wrong on all this, my family will donate 1m to Beaufort county as an apology in my behalf, and I will move to Florida.

Now let's see if the press will cover this story of the importance of Forensic Audits. Thanks

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 28, 2017, at 9:08 AM, fran bisi <eyelandart@yahoo.com> wrote:

> Ms. Crosby, (Ms. Staton and any interested Board members):
> When I started to take a look at the Beaufort County School District Transparency Reports at the beginning of this year, I addressed my questions to you, Ms. Crosby. You never answered my emails and instead deferred to your boss, Superintendent J. Moss. He deflected, insulted and threatened me with defamation lawsuits. Now that the District has realized those tactics aren't going to work, and in fact, only made the

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

controversy more intense, your Finance Dept. has decided to make changes. This timing is not just a coincidence. As a result of these stall tactics, the taxpayers not only do not trust Moss, but now lack trust in all financial matters of The District. As CFO, YOU have an obligation to respond.

I would like these items to be addressed:

1.) What is this charge?
6/9/2017 GCA SERVICES GROUP DISTRICT OFFICE* 4/22/17 CUSTODY-(CHECK) $ 733,661.18
Fund # 822 CINDERELLA FELLA BALL

2.) Why was former CFO Phyllis White allegedly paid an additional $60,000.00 after her retirement and at least $5,000/month since February 2017.

As an example, here is the most recent payment:

6/9/2017 PHYLLIS S. WHITE MAY 2017 CONSULTING AND TRAVEL REIMBURSEMENT $6302.50 100 GENERAL FUND

Does she have a new contract? Has there been Board approval? How long will these monthly payments continue? Moss stated at a recent Board meeting that she was responsible for the marked increase in P-Card purchases. Why didn't she suggest this policy before Moss came on board?

3.) What Fund was used to write the one check to pay almost $3M on June 22,2017:
6/22/2017 BANK OF AMERICA MAY P-CARD PAYMENTS-**(CHECK) $ 2,977,361.06 ASSOCIATED FUNDS**

J. Moss emphatically stated in his email to me dated April 12, 2017:
"The payment is NOT made from one source, but ONE check is written." so there is no doubt that one check is issued every month to pay B of A.
It is time for "associated funds" to stop being the notation next to the payment. Moss chose to alter all of the Transparency Reports for FY2017 by deleting the Fund name and Number for each B of A payment. When financial records published on a School District website are changed, a cover-up of some sort is suspected. It's all about perception. Every other check that is written each month shows the source of the money. It is up to you to clarify your Finance Department's reports to the public.

4.) Where were the bookkeepers when the following charges were made by principals as gifts which are not allowed?
TXN00190465 5/4/2017 SQ CHANTEL TAI 70795300-566000 $322.00 (massage)
TXN00190447 5/4/2017 SQ THE WELLNESS CO 70795300-566000 $330.40 (spa day)
TXN00192381 5/25/2017 SWAROVSKI 309 70895300-566000 $171.72 (bracelets)
You have stated publicly on various occasions that they (bookkeepers) are the first line of defense. You said that they receive intensive, continuous training. My understanding is that it is the bookkeeper's job to ward off fraud, waste and abuse of credit cards. They report directly to their principals. It appears that the bookkeepers were unable to say "no" to their bosses when both were fully aware of the P-Card policy which prohibits gifts. This is in direct conflict with what you have claimed to be true. One has to wonder how many of these inappropriate charges were made in the past. Why did it take a private citizen to uncover these abuses of your P-Card Policy? It appears that this has been going on for quite some time because employees felt that no one was watching. All of this adds to the lack of trust that the public has for the District. This is unfortunate since it is the students who suffer when teachers are told there is no money in the budget for classroom supplies, yet principals are handing out "gifts" at will.

5.) In June of 2018, **325** checks were written for "Employee Reimbursement" totaling almost **$70,000.00**. This is more than teachers make in a year and all in a month when school was not in session. No employee name or detailed reason is given for the issuance of these checks. When a Board member receives reimbursement, their name is

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

part of the line item. Why not do this for District employees? As long as these are legitimate payments, no employee should be opposed to having the details made public.

6.) You provided a list of the 50 or so B of A credit card holders at a recent Board meeting. Supt. J. Moss is the only employee in the District with a card in his name. His monthly credit limit is $20,000.00. What is the code that would appear next to any of the items that he charges?

And, Ms. Staton, please provide me with a record of all of his charges since he was hired in 2013. Public speculation about how J. Moss has been using his district credit card has ranged from illegal to immoral. The only way we can get to the truth is to disclose all of the charges on J. Moss' district credit card. Since that is in the public interest, I am requesting that any fees associated with these records be waived.

Thank you for your attention to these matters.

fran bisi

---

6 attachments

AttachedFile.gif
1K

AttachedFile.gif
1K

AttachedFile.gif
1K

Filed Exhibits.pdf
2107K

Filed Summons & Complaint.pdf
290K

Request to Produce Computers for Inspection Copying.pdf
330K

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Gmail by Google

Gregg Alford <gregg@alfordlawsc.com>

Re: Christmas Theft versus Gift ——Skip Hoagland to file another lawsuit against the Town of Hilton head 2018 for allowing theft and unconstitutional misuse of atax funds by Private non profits and the city Dmo chamber

1 message

Skip Hoagland <shoagland@me.com> Tue, Jan 2, 2018 at 8:17 PM
To: JohnM@hiltonheadislandsc.gov, davidb@hiltonheadislandsc.gov, jerry at the beach <gringoviejotwo@yahoo.com>, marksanford99@gmail.com, sarah borton <sborton@islandpacket.com>, linda rew <linda@hiltonhead.com>, dan@media360.com, eric@laislamagazine.com, bortonb@uscb.edu, David Lauderdale <letters@islandpacket.com>, Will Folks <will.folks@gmail.com>, david@myrtlebeachsc.com, eriggs949@gmail.com, wegmannj@beaufortlaw.com, Sarah Sanford <sarahsanford@palmettobluffonline.com>, srawls@clawsonandstaubes.com, Barrett Brewer <BBrewer@clawsonandstaubes.com>, gregg@alfordlawsc.com, Brian Tolley <btolley@islandpacket.com>, dlauderdale@islandpacket.com, tmoss@islandpacket.com, Gina Smith <gsmith@islandpacket.com>, stever@hiltonheadislandsc.gov, joseph.dunkle@beaufort.k12.sc.us, Josephine.Orischak@beaufort.k12.sc.us, John Dowling <dowlingjohn287@gmail.com>, John Crangle <johncrangle2@gmail.com>, chris@hickspub.com, edukes@lcre.com
Cc: Alden Bauer <aldenbauer706@gmail.com>, fran bisi <eyelandart@yahoo.com>, mark@marksanford.com, Tim Scott <joe_mckeown@scott.senate.gov>, jwiendl@sonesta.com, tecklenburgj@charleston-sc.gov, jrhodes@cityofmyrtlebeach.com, psommerville@bcgov.net, "Caporale, Rick" <rcaporale@bcgov.net>, REBECCA BASS <muttleycrew2008@gmail.com>, Jim Bequette <jwbterp@aol.com>, Marilyn Bullard <bullardplwko@aol.com>, Tony Cambria <info@windrunnerstables.com>, "mkeel@sled.sc.gov" <mkeel@sled.sc.gov>, "Meyerhofer, Kelly" <kmeyerhofer@islandpacket.com>, "Gwozdz, Christina S" <Christina.Gwozdz@beaufort.k12.sc.us>, "Flewelling, Brian" <brianf@bcgov.net>, "Kinton, Geraldine C" <Geraldine.Kinton@beaufort.k12.sc.us>, "shannonerickson@schouse.org" <shannonerickson@schouse.org>, "Stewart, Jerry" <jstewart@bcgov.net>, "Dawson, Gerald" <gdawson@bcgov.net>, Rick Brundrett <rbrundrett@islandpacket.com>, "michaelrivers@schouse.gov" <michaelrivers@schouse.gov>, "Campbell, Earl" <earl.campbell@beaufort.k12.sc.us>, "ami@ethics.sc.gov" <ami@ethics.sc.gov>, "jdpc@hargray.com" <jdpc@hargray.com>, "tom@senatortomdavis.com" <tom@senatortomdavis.com>, Liz Farrell <efarrell@islandpacket.com>, "Staton, Jennifer A" <Jennifer.Staton@beaufort.k12.sc.us>, "pgrant@sled.sc.gov" <pgrant@sled.sc.gov>, "tmbdab@aol.com" <tmbdab@aol.com>, "Fobes, Steve" <sfobes@bcgov.net>, Joseph Iaco <jiaco@bellsouth.net>, "Rodman, Stewart" <srodman@bcgov.net>, "awilson@scag.gov" <awilson@scag.gov>, "Spiker149@hargray.com" <Spiker149@hargray.com>, "wnewton@jsplaw.net" <wnewton@jsplaw.net>, "cnrgbr@hargray.com" <cnrgbr@hargray.com>, "deann.komanecky@blufftontoday.com" <deann.komanecky@blufftontoday.com>, "zoomru@yahoo.com" <zoomru@yahoo.com>, "Gregory, Cynthia W" <Cynthia.Gregory@beaufort.k12.sc.us>, "rgregory@sled.sc.gov" <rgregory@sled.sc.gov>, "shamm@ethics.sc.gov" <shamm@ethics.sc.gov>, "jbagnall@ethics.sc.gov" <jbagnall@ethics.sc.gov>, "Cordray, Mary M" <Mary.Cordray@beaufort.k12.sc.us>, "jeffbradley@schouse.gov" <jeffbradley@schouse.gov>, "dwilliams@sled.sc.gov" <dwilliams@sled.sc.gov>, "mburchstead@ethics.sc.gov" <mburchstead@ethics.sc.gov>, "usn1066@gmail.com" <usn1066@gmail.com>, "lgibson@scag.gov" <lgibson@scag.gov>, "Crosby, Tonya V" <Tonya.Crosby@beaufort.k12.sc.us>, "Cushingberry, Robyn L" <Robyn.Cushingberry@beaufort.k12.sc.us>, "contact@beaufortwatchdog.org" <contact@beaufortwatchdog.org>, "Payne, Wilbur M" <Wilbur.Payne@beaufort.k12.sc.us>, Auditor <auditor@bcgov.net>, "Striebinger, David R" <David.Striebinger@beaufort.k12.sc.us>, "Covert, Michael" <mcovert@bcgov.net>, Tom Davis <tdavis@harveyandbattey.com>, "William G. Bill Herbkersman" <schsdistrict118@aol.com>, John Munro <JMunro@seapines.com>, Steve Birdwell <sbirdwell@seapines.com>, gerard mahieu <gerardmahieu@aol.com>, Marc Frey <mfrey@freymedia.com>, Sarah Borton Sarah Borton <sgillis@islandpacket.com>, Dave Schwartz <dave@scpolicycouncil.org>, Jim Carpenter <james.carpenter@carpenterlawfirm.net>, Cynthia Bensch <bensch@hargray.com>, David Amesco <amesco@earthlink.net>, Lee Bright <Lee@brightagencyinc.com>, Russ Keep <hhlaw@hargray.com>, joeborelli1@mac.com, Justin New Orleans Lawyer Justin New Orleans Lawyer <jwinch@smithstag.com>, Art Davis <art@globallylocally.com>, Jeremia Froyland <jeremiafroyland@gmail.com>, josh metnick <josh@chicago.com>, Fred Mercaldo <fred@scottsdale.com>, Austin Andrukaitis <austinandrukaitis@gmail.com>, John Keener <john@charlestoncrabhouse.com>, John Durst <john@scria.org>, nancy watt <wighhi@aol.com>, david tigges <dtigges@mcnair.net>, Billy Keyserling <billyk@islc.net>, tvaux@bcgov.net, Joe And Chris Joe And Chris <cjpvap01@aol.com>, Joe Duboise <joe@lowcountrylegal.com>, Larry Myers <Meyersteamrealty@gmail.com>, Karl Engelman <karl@engelman.org>, Ryan McAvoy <mcavoylegend@gmail.com>, peter@mediafeedia.com, Taylor@harrisonfirm.com, Jay Bender <jbender@brblegal.com>, Cary Corbitt <CCorbitt@seapines.com>

Mr McCann, you just sent this out. Tell me where it says our chamber can use our millions in Atax money to develop Dmo apps and websites in Canada they own and control, not the Town. This is outrageous that we would allow this crook, Bill Miles to take our money to another country, basically saying we have not got the talent not only on Hilton Head, SC but the entire USA. This is massive insanity and abuse.
Where does it say this chamber can sell millions in ad sales to profit crook Bill Miles 400k annual salary and what he is stealing we don't know about, because you, Bill Harkins and Tom Lennox lied and said you saw the chambers financials, and you felt they did not need to be independently audited. Mr McCann, are you now so smart you can forensically audit or look at a set of books in 2 hrs, my accountant said would take weeks?

Where does it say Mr Miles and this chamber does not have to pay IRS Ubi taxes from all this income and profit? Where does it say this chamber can co-mingle their private members dues with public funds? Where does it say this chamber does not have to open its books to tax payers and its own members on how it spends this money under Foia laws and non profit corporation act laws?

Where does it say the Town of Hilton Head should use tax monies to join a private corporation and same one they fund with tax funds, and attend their private party Chamber Ball to wine and dine on tax payers dime?

Mr McCann, where does it say one state code or state law can be created that causes other laws to be broken?

Where does it say Atax funds can legally be used for private use and private profit purposes?

Mr McCann, are you aware the SC law says and recent Supreme Court ruling you can't use public Atax funds or any public funds, matching grants that is not for the public good, use, purpose and benefit?

You can not use public funds to be abused and pay for overcharged abuse like a private chamber app for 100k, 340k attempt until I stopped this, that cost 30k.

I guess you think it's ok to approve 200 in stolen tax monies for Kim Likins private job lawsuit against a citizen as well ?

You can't keep funding with Atax funds with no proven performance metrics. You were supposed to provide the performance metrics of this chamber app and have not to date. This is another one of your incompetent, crooked corrupted lies.

Mr McCann, you lied plain and simple, and you disrespected those who trusted you. This is all not true nor been compiled to.
http://www.mccannhhi.com/example2.pdf

This is a lie, Atax funds return 20 -30 -40 times the investment. Is this how you made it in the business world, by inflating and lying to others to climb the ladder. Provide your proof?

Again, you are an older retired man like me, you attempt to strip power of Mayor Bennett and say you will operate the same way if you become Mayor. Do you really think people, me included, don't see through this corruption, trick and game to give crook Steve Riley more power and Steve will take care of you? Why don't you just retire Mr McCann, you are over your head.

Dear Friends, My family and I wish you and your family health, happiness and time with the people you love. Happy Holidays!
I have frequently been asked about the difference between ATAX and property taxes, and how the ATAX grants are awarded. Click on this link (full state attached) for a clear explanation of the ATAX grant process. As I evaluate grant applications that Town Council has been presented for approval, among other things, I consider the number of tourists attracted, total budget, trends, and economic impact for our community. The larger recipients like the Chamber of Commerce, the Arts Center of Coastal Carolina's, the Coastal Discovery Museum, and the HHI Symphony, all generate significant island-wide economic value that are 20, 30, and 40+ times the amount of their grants. That's ATAX funding working at it's best!
WORKFORCE AVA

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Dec 23, 2017, at 1:57 PM, Skip Hoagland <shoagland@me.com> wrote:

> Well this council just gave the tax payers another Christmas theft, versus a gift.
> Mr Riley you and your crooked lying council majority will have another lawsuit filed against you. This highly corrupted incompetent Town council is allowing theft and unconstitutional misuse of our public funds for private purpose . The SC law is clear, you can't keep issuing tens of millions of Atax funds and even our general tax monies for private use, and worse allowing private profit in violations or state laws and federal Irs 501-c6 tax codes. Public Atax funds and all tax monies can only be used and issued for the public good, use and benefit. Many recipients on the Atax list are private, and worse no audits, transparency, accountability or oversight. The Dmo listed on your Atax list cleverly hides and you put down as Town of Hilton head for the 1.6m in Atax funds versus City Dmo currently the Chamber. Where was the procurement this year you were sued for ?
>
> You keep refusing to respect the professionals who address you all, this entire council has a false sense of knowledge and superiority sitting on this Dias. You all keep forgetting you are Public servants who work for the tax payers. You are supposed to spend and protect tax monies like you own, not steal tax monies and allow others to as well. You also keep listening to incompetent Town Lawyers Gregg Alford and Brian Hulbert who keep getting you in trouble and sued. They should all be fired and sued for malpractice, Steve riley terminated and all investigated by the FBI for criminal theft of our tax monies and allowing fraud by Atax recipients. In fact we need an FBI investigation of this entire town and council. I am confident this will happen at some point in time. How we ended up with so many incompetent, crooked and corrupted officials in SC is a hard for many to imagine.
>
> **Subject: Supreme Court Case**
>
> http://www.sccourts.org/opinions/HTMLFiles/SC/27738.pdf

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 18, 2017, at 7:10 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202
>
> On Aug 18, 2017, at 8:04 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:
>
> > Once a Forencic audit is done of the following people in Beaufort county, we can restore our county back to a civil local society operated under the law. We have no law and order. All these people who have control and access to all our tax funds, must be not just forensically audited, but investigated. What has happen is we have allowed these employees to seize 100% control from part time local officials, who are supposed to represent our interest and be good stewards of our tax money, they have failed us all miserably. We have zero oversight by anyone.
> >
> > Our political system made up of part time elected officials with no one in charge, including our weak Mayors who can't even hire or fire, and only has one vote. The majority councils have become so corrupted that basically they assist Jeff Moss, Bill miles and Town managers to rob us blind. We are in deep crisis and many are in denial. I am trying to say what others think, and are in fear of saying. If I do not speak for up for this community, who is going to take my place ? Facts and truth is ugly and painful, but the corruption allowed to continue with no Audits is much worse. To date and 3 years later, not one person including Sarah Borton and all officials have challenged my facts. The only thing they have done is tried to silence, suppress, delete and edit my work. We all now know why !!!! Question is what is law enforcement going to do to help save our community from all these crooks, liars and thieves.
> >
> > Forencic Audits like Berkeyley SC must be done asap:
> >
> > 1 Jeff moss/ all accountants/ audit firm

2. Bill miles/ Ray deal / Ray
Warco/ Bobby creech auditor
3.Steve riley and Hhi Town lawyers Gregg Alford / Brian hulbert
4 Marc Orlando / Lisa Sulka / Terry finger Bluffton Town
5. Gary Kubic/ Josh Gruber
Town and county of Beaufort.

All our local officials like Mark Sanford are in hiding and are scared to speak up. We need to force them all to respond at every public event they all attend. Huge crisis!!!! Thanks

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 18, 2017, at 5:02 PM, jerry at the beach <gringoviejotwo@yahoo.com> wrote:

> Regarding the below;
>
> *Note, for this corrupted board, a forensic audit is only 100k and they have been paying 50k that allows theft, embezzlement and will not know how much until Jeff Moss and Bill Miles are forced to a forensic audit. These 5 people who voted against an Forensic audit should be ashamed, removed from office and not sure how they can look at anyone including their families and be proud of this.*
>
> I could not agree more. As I have said before,...<u>the cost of NOT insisting on a forensic audit is what troubles me.</u> 50K is peanuts in a quarter billion dollar budget.
>
> ~Jerry

On Friday, August 18, 2017, 3:56:05 PM EDT, CC Hoagland <skiphoagland@yahoo.com> wrote:

Jerry, as you already know, I seek out corruption and wrong doing in Beaufort county, no matter where it's going on. I let facts speak for themselves and cc and bc many, including all law enforcement agencies both state and federal and all local officials both honest and corrupted. I fear no one, no retaliation, loss of job or even friends. I do not pick or chose based on politics, friends, or friends of friends in our small local incestous community. My goal is to stop corruption and replace dishonest people with honest people to serve us all.

It's simple, Ms Borton does not receive advertising from the School Board. She picks and chooses who she will report on and in fact, told me in so many words on one of many private conversations I had with her as Publisher to Publisher, she had to be careful who she reported on, as not to lose ads or readership. She is an employee, not the owner of this paper and like many of us fears for her job and profits. This is not new and can be read online about other newspapers taking this position behind closed doors.

On top of this, I have now connected her husband Brett Borton to much of the corruption I am after, not connected to the School board and crook Jeff Moss, his hired audit firm in Charleston and this corrupted, incompetent Moss Majority Board. In fact, based not just on Berkeley county corruption for the school CFO and the chamber, other school board corruption you can read about online nationwide, including credit card misuse.

We just don't need a forensic audit, we need a detailed federal FBI IRS investigation of Moss, his lawyers, accountants and the audit firm he hired "Not Independent". The forensic audit of the Moss hired audit, just like the hired audit of the Bill Miles chamber will prove to be corrupted and I predict prison for many, once this is done. Moss lied once he will lie twice. Town councils and this School board who says things like they do to justify not doing a forensic audit, could not being any more ignorant or corrupted.

If they are discovered to be tied to Moss in any way other than just being ignorant, incompetent or naive once this deep investigation is accomplished, they like Moss and others, will join them in prison and perhaps share a cell with the Berkeley school CFO.

Now back to Sarah Borton. I warned her, in private emails, to start doing more fair coverage based on facts on Bill Miles, the chamber, Town of Hilton Head, the Atax committee, the LCGOA(low country golf owners association) and USCB and Jane Upshaw past Chancellor, and she would not. (Just like Tenet and the hospital.) Fact is Brett Borton is tied and friends with all this. USCB, Bill Miles, Sea Pines Cary Corbitt, Steve Birdwell President of Sea Pines, Brad Marra Palmetto Dunes, Chamber board, Atax committee, David Tigges McNair law firm, Paula Bethea past lottery commissioner, and more. It's a deep incestuos tangled web of corruption, that I decided to stop after 40 yrs of living on this island, I simply had enough.

Brett Borton was head of the Lcgoa and tied to Bill Miles and much more. Then when the heat started by me, he was hired by Chamber board member Jane Upshaw, husband Tom Upshaw, past president of Palmetto Electric and Chairman of the Chamber with Bill Miles, who refused my membership in an attack to put me out of business, just as they did the Lcgoa crooks put Marc Freys Golfers Guide out of business. I have all the facts for the FBI, Sled and Attorney General.
Too much to keep adding as a reply to your email.

Yes the Packet article on the School board is good, as was their past coverage that never gave credit to BWD and myself on the ethics commission ruling on Moss. Sarah and her husband, like many, just got sucked into the local community and took jobs with crooks that inturn could silence coverage on local friends. Again, an investigation and questions for Sarah and her husband will prove to be shocking. However, you will not read this in Packet until Sarah Borton is replaced with a neutral publisher. Sarah Borton is a member of the chamber and allowed her editor David Lauderdale to be used as a puppet to receive citizen of the year by Bill Miles, why?

Folks, we live in a spotlight movie 2 community, not about the Catholic Church, its about a corrupt school board, Chamber, local newspaper, Town councils, Town managers like crook Steve Riley. There is so much incestous tie in's, that it's hard to even believe as not some wild conspiracy theory. Fact is, I have the facts to discount the conspiracy theory.
Thanks

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

011-54-9-11-5942-3202

On Jul 27, 2017, at 6:37 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> Cookie cutter audits are not meant to catch crimes. This is why our state is in trouble. Never in the 100 year history has any School districts, chambers and towns been forensically audited.
> Berkeley county SC first one on Sc. Those in other states that have refused forencic audits and then forced or investigated by the FBI IRS investigations have mostly resulted in prison. Here is your answer. Palm beach type audits
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202
>
> On Jul 27, 2017, at 5:59 PM, fran bisi <eyelandart@yahoo.com> wrote:
>
> > I think what you have attached isn't referring to a forensic audit, but a CAFR that Moss was referring to...AKA Cookie Cutter.
> >
> > ***fran***
> >
> > On Thursday, July 27, 2017 5:22 PM, "Caporale, Rick" <rcaporale@bcgov.net> wrote:
> >
> > Fran:
> >
> > When we think or talk about audits, we should all recall the role (complicity?) of auditing firms in the financial meltdown. A few of whom are no longer in business. Have we forgotten so soon? The attached document ("Are Audits Worthless") is worth a quick read.
> >
> > RC
> >
> > ---
> >
> > From: fran bisi [eyelandart@yahoo.com]
> > Sent: Thursday, July 27, 2017 4:19 PM
> > To: Orischak, Josephine A; REBECCA BASS
> > Cc: Jim Bequette; Marilyn Bullard; jerry at the beach; Tony Cambria; mkeel@sled.sc.gov; Meyerhofer, Kelly; Gwozdz, Christina S; Flewelling, Brian; Kinton, Geraldine C; shannonerickson@schouse.org; johncrangle2@gmail.com; Stewart, Jerry; Dawson, Gerald; Rick Brundrett; skiphoagland@yahoo.com; michaelrivers@schouse.gov; Campbell, Earl; ami@ethics.sc.gov; jdpc@hargray.com; joe_mckeown@scott.senate.gov; tom@senatortomdavis.com; Dunkle, Joseph R; taylor@harrisonfirm.com;

Liz Farrell; Staton, Jennifer A; pgrant@sled.sc.gov; tmbdab@aol.com; marksanford99@gmail.com; Fobes, Steve; Joseph Iaco; Caporale, Rick; Rodman, Stewart; awilson@scag.gov; Spiker149@hargray.com; wnewton@jsplaw.net; cnrgbr@hargray.com; deann.komanecky@blufftontoday.com; zoomru@yahoo.com; Gregory, Cynthia W; John Dowling; rgregory@sled.sc.gov; shamm@ethics.sc.gov; jbagnall@ethics.sc.gov; Cordray, Mary M; jeffbradley@schouse.gov; dwilliams@sled.sc.gov; mburchstead@ethics.sc.gov; usn1066@gmail.com; lgibson@scag.gov; Crosby, Tonya V; aldenbauer706@gmail.com; Cushingberry, Robyn L; contact@beaufortwatchdog.org; Payne, Wilbur M; Auditor; Striebinger, David R; Covert, Michael
Subject: Re: Moss Letter to editor
July 26,2017 @5:13

If I'm correct they "selected 40 transactions" for Fiscal Year 2016. They were "examined for compliance with the District's procurement policy and not exceptions were noted." Whatever that means, I'm not impressed.
That's less than a day's worth of transactions.

Example: on Jan 5th and 6th of 2016 there were 37 transactions and that's not counting those under $100.

Is this what he calls an audit?

fran

On Thursday, July 27, 2017 1:53 PM, "Orischak, Josephine A" <Josephine.Orischak@beaufort.k12.sc.us> wrote:

All,

FYI: Here is a link to the BCSD website for Procurement Audits performed from 2013 to the present. Open the 'Other Financial Reports' folder to view.

http://beaufortschools.net/cms/one.aspx?portalId=170925&pageId=296554

JoAnn Orischak
Beaufort County Board of Education
District 11
Hilton Head Island
C. (843) 338-1737

Sent from my iPad

On Jul 27, 2017, at 9:36 AM, "REBECCA BASS" <muttleycrew2008@gmail.com<mailto:muttleycrew2008@gmail.com>> wrote:

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

In his letter, Moss does say "they are reviewed each year by a pair of separate independent audits". We should request copies of these audits and ask who conducted them.

Rebecca

On Thu, Jul 27, 2017 at 9:25 AM, Jim Bequette <jwbterp@aol.com<mailto:jwbterp@aol.com>> wrote:

I am attaching a letter written by the Superintendent which was printed in last night's internet edition of the Packet/Gazette. Moss asserts that letter writers have asserted that "Beaufort County School District employees have misused tax dollars" using district credit cards. He then states "nothing could be further from the truth".

Why does he not promote having a forensic audit to assure us taxpayers that his statement is factual? Why aren't we given all the facts on the admitted 47 fraudulent charges on those card?. Who did the two separate independent "reviews" of P-card that he cites in this letter? Note he doesn't say audits. I will submit an FOIA request for the "reviews".

I read the county government spends about $1 million a year on credit cards while the School District is up about $25 million. The county budget is smaller than 1/2 of the school's.

Many, many charges on those P-cards as reported by Fran Bisi look very questionable. Superintendent Moss can only quiet down the public uproar by immediately having the Board approve a forensic audit. How can you take his statements as fact after he was already found in two ethics violations?

Last I would like to commend Fran Bisi for her great work in exposing what could be a monumental problem. However if Moss and the Board do not approve a forensic audit, the citizens will never know the truth or trust them.

Jim Bequette Retired CPA in Md, WV, and SC

--
Rebecca W. Bass
Broker in Charge
SeaBass Properties Real Estate
Licensed in South Carolina and Georgia
843-263-3772

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

<attachment 1>
<attachment 2>
<attachment 3>
<attachment 4>
<attachment 5>
<attachment 6>
<attachment 7>
<attachment 8>
<attachment 9>
<attachment 10>
<attachment 11>
<attachment 12>
<attachment 13>
<attachment 14>
<attachment 15>
<attachment 16>
<attachment 17>
<attachment 18>
<attachment 19>
<attachment 20>
<attachment 21>
<attachment 22>
<attachment 23>
<attachment 24>
<attachment 25>
<attachment 26>
<attachment 27>
<attachment 28>
<attachment 29>
<attachment 30>
<attachment 31>
<attachment 32>
<attachment 33>
<attachment 34>
<attachment 35>
<attachment 36>
<attachment 37>
<attachment 38>
<attachment 39>
<attachment 40>
<attachment 41>
<attachment 42>
<attachment 43>
<attachment 44>
<attachment 45>
<attachment 46>
<attachment 47>
<attachment 48>
<attachment 49>
<attachment 50>
<attachment 51>
<attachment 52>

<attachment 53>
<attachment 54>
<attachment 55>
<attachment 56>
<attachment 57>
<attachment 58>
<attachment 59>
<attachment 60>
<attachment 61>
<attachment 62>
<attachment 63>
<attachment 64>
<attachment 65>
<attachment 66>
<attachment 67>
<attachment 68>
<attachment 69>
<attachment 70>
<attachment 71>
<attachment 72>
<attachment 73>
<attachment 74>
<attachment 75>
<attachment 76>
<attachment 77>
<attachment 78>
<attachment 79>
<attachment 80>
<attachment 81>
<attachment 82>
<attachment 83>
<attachment 84>
<attachment 85>
<attachment 86>
<attachment 87>
<attachment 88>
<attachment 89>
<attachment 90>
<attachment 91>
<attachment 92>
<attachment 93>
<attachment 94>
<attachment 95>
<attachment 96>
<attachment 97>
<attachment 98>
<attachment 99>
<attachment 100>
<attachment 101>
<attachment 102>
<attachment 103>
<attachment 104>

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

From: Skip Hoagland shoagland@me.com
Subject: Sara Borton retires or was she fired and allowed to escape bad press. No one retires at 55-58. Mcclatchy owns the papers in Hilton Head, Myrtlebeach , Columbia and Rock Hill SC we need non censored press
Date: December 23, 2017 at 1:03 PM America/New_York
To: chris hendricks chendricks@mcclatchy.com, davidb@hiltonheadislandsc.gov, mcovert@bcgov.net, Brian Tolley btolley@islandpacket.com, tvaux@bcgov.net, Rick Caporale rcaporale@bcgov.net, sturodman@aol.com, fran bisi eyelandart@yahoo.com, mark@marksanford.com, Tim Scott joe_mckeown@scott.senate.gov, jwiendl@sonesta.com, tecklenburgj@charleston-sc.gov, jrhodes@cityofmyrtlebeach.com, psommerville@bcgov.net, dpascoe@scsolicitor1.org, "brad.dean@visitmyrtlebeach.com" brad.dean@visitmyrtlebeach.com, "mlowder@cityofmyrtlebeach.com" mlowder@cityofmyrtlebeach.com, Randal Wallace rwallace@cityofmyrtlebeach.com, John Pedersen jpedersen@cityofmyrtlebeach.com, Wayne Gray wgray@cityofmyrtlebeach.com, Sled Paul Grant Sled Paul Grant mkeel@sled.sc.gov, Sled Paul Grant Sled Paul Grant pgrant@sled.sc.gov, "mchestnut@cityofmyrtlebeach.com" mchestnut@cityofmyrtlebeach.com, Mary Jeffcoat mjeffcoat@cityofmyrtlebeach.com, Mark Kruea MKruea@cityofmyrtlebeach.com, Attorney General Alan Wilson Attorney General Allan Wilson AWilson@scag.gov, cjohnson@postandcourier.com, Fontana Nicole J njfontana@nmb.us, "Cavanaugh, Bob" rjcavanaugh@nmb.us, "Hatley, Marilyn" mayor@nmb.us, Scott Brandon SBrandon@thebrandonagency.com
Cc: "Orischak, Josephine A" Josephine.Orischak@beaufort.k12.sc.us, REBECCA BASS muttleycrew2008@gmail.com, Jim Bequette jwbterp@aol.com, Marilyn Bullard bullardpiwko@aol.com, jerry at the beach gringoviejotwo@yahoo.com, Tony Cambria info@windrunnerstables.com, "shannonerickson@schouse.org" shannonerickson@schouse.org, "mkeel@sled.sc.gov" mkeel@sled.sc.gov, "Meyerhofer, Kelly" kmeyerhofer@islandpacket.com, "Gwozdz, Christina S" Christina.Gwozdz@beaufort.k12.sc.us, "Flewelling, Brian" briant@bcgov.net, "Kinton, Geraldine C" Geraldine.Kinton@beaufort.k12.sc.us, "johncrangle2@gmail.com" johncrangle2@gmail.com, "Stewart, Jerry" jstewart@bcgov.net, "Dawson, Gerald" gdawson@bcgov.net, Rick Brundrett rbrundrett@islandpacket.com, "michaelrivers@schouse.gov" michaelrivers@schouse.gov, "Campbell, Earl" earl.campbell@beaufort.k12.sc.us, "ami@ethics.sc.gov" ami@ethics.sc.gov, "jdpc@hargray.com" jdpc@hargray.com, "tom@senatortomdavis.com" tom@senatortomdavis.com, "Dunkle, Joseph R" Joseph.Dunkle@beaufort.k12.sc.us, Liz Farrell efarrell@islandpacket.com, "Staton, Jennifer A" Jennifer.Staton@beaufort.k12.sc.us, "pgrant@sled.sc.gov" pgrant@sled.sc.gov, "tmbdab@aol.com" tmbdab@aol.com, "marksanford99@gmail.com" marksanford99@gmail.com, "Fobes, Steve" sfobes@bcgov.net, Joseph Iaco jiaco@bellsouth.net, "Rodman, Stewart" srodman@bcgov.net, "awilson@scag.gov" awilson@scag.gov, "Spiker149@hargray.com" Spiker149@hargray.com, "wnewton@jsplaw.net" wnewton@jsplaw.net, "cnrgbr@hargray.com" cnrgbr@hargray.com, "deann.komanecky@blufftontoday.com" deann.komanecky@blufftontoday.com, "zoomru@yahoo.com" zoomru@yahoo.com, "Gregory, Cynthia W" Cynthia.Gregory@beaufort.k12.sc.us, John Dowling dowlingjohn287@gmail.com, "rgregory@sled.sc.gov" rgregory@sled.sc.gov, "shamm@ethics.sc.gov" shamm@ethics.sc.gov, "jbagnall@ethics.sc.gov" jbagnall@ethics.sc.gov, "Cordray, Mary M" Mary.Cordray@beaufort.k12.sc.us, "jeffbradley@schouse.gov" jeffbradley@schouse.gov, "dwilliams@sled.sc.gov" dwilliams@sled.sc.gov, "mburchstead@ethics.sc.gov" mburchstead@ethics.sc.gov, "usn1066@gmail.com" usn1066@gmail.com, "lgibson@scag.gov" lgibson@scag.gov, "Crosby, Tonya V" Tonya.Crosby@beaufort.k12.sc.us, "Cushingberry, Robyn L" Robyn.Cushingberry@beaufort.k12.sc.us, "contact@beaufortwatchdog.org" contact@beaufortwatchdog.org, "Payne, Wilbur M" Wilbur.Payne@beaufort.k12.sc.us, Auditor auditor@bcgov.net, "Striebinger, David R" David.Striebinger@beaufort.k12.sc.us, tdavis@harveyandbattey.com, "William G. Bill Herbkersman" schsdistrict118@aol.com, John Munro JMunro@seapines.com, Steve Birdwell sbirdwell@seapines.com, gerard mahieu gerardmahieu@aol.com, Marc Frey mfrey@freymedia.com, Sarah Borton Sarah Borton sgillis@islandpacket.com, Jay Bender jbender@brblegal.com, Dave Schwartz dave@scpolicycouncil.org, Jim Carpenter james.carpenter@carpenterlawfirm.net, Cynthia Bensch bensch@hargray.com, David Ames amesco@earthlink.net, Lee Bright Lee@brightagencyinc.com, Russ Keep hhlaw@hargray.com, joeborelli1@mac.com, Justin New Orleans Lawyer Justin New Orleans Lawyer jwinch@smithstag.com, Art Davis art@globallylocally.com, Jeremia Froyland jeremiafroyland@gmail.com, josh metnick josh@chicago.com, Fred Mercaldo fred@scottsdale.com, Austin Andrukaitis austinandrukaitis@gmail.com, John Keener john@charlestoncrabhouse.com, John Durst john@scrla.org, nancy watt wighhi@aol.com, linda rew linda@hiltonhead.com, dan@media360.com, eric@laislamagazine.com, Ryan McAvoy mcavoylegend@gmail.com, Barrett Brewer BBrewer@dawsonandstaubes.com, gregg@alfordlawsc.com, Sarah Sanford sarahsanford@palmettobluffonline.com, aldenbauer706@gmail.com, sarah borton sborton@islandpacket.com, david@myrtlebeachsc.com, Will Folks will.folks@gmail.com, Stephen Fastenau sfastenau@islandpacket.com, Alex Kinkaid akincaid@islandpacket.com, Lucas High lhigh@islandpacket.com, Erin Heffernan Island Packet eheffernan@islandpacket.com

Sara Borton harmed our community for 25 yrs. She compromised journalistic integrity by censoring and not running stories on her friends, biggest advertisers and even her husband Brett borton corrupted connections. We need to restore proper news coverage in SC. She damaged the integrity of Mcclatchy corporation by her actions and lost many readers that migrated to online news organizations like Fitsnews , myrtlebeachsc.com who report all news, regardless of its message and content. Let's hope we get a new publisher not afraid nor controlled by big advertisers or local incestuos power brokers to restore our local community newspaper and State paper. Perhaps the new publisher will rejoin the Hhi chamber as a member, and he will demand access to all this Chambers financials under the non profit corporation act laws as I and others have. We need a publisher who believes in full transparency and accountability on all, not just some.

Sara Borton for me is not qualified for a low level job at Walmart for what she did to this community. For me she should be investigated for the damage she did to our community by the elimination and censorship of free press tied to corruption and crooks who ended up controlling her and our community newspaper. Now she has to live with herself.

Add lying Council members Lennox, Harkins and McCann who say they saw the Chamber accounting, which was a lie and fraud in order to allow this chamber to hide its crimes. Worse crook Steve Riley stole our tax monies to join the chamber as a town member, they all attended the Chamber Ball to drink more alcohol laced Bill Miles kookade to wine and dine on tax payers dime. Our own Town council, like the Island Packet, who we all trusted to protect our tax monies and report the news, are both as members of this chamber refusing to force transparency for all members to see the chamber accounting and allowing ongoing theft, fraud and unconstitutional misuse of our tax funds and members dues, and extreme violations to local media and Irs Ubi tax violations.

http://www.islandpacket.com/news/business/article187988134.html

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Sep 2, 2017, at 5:38 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

Tabor / Rick / Mike / Stu, are you all serious or is this a joke and fake news report? I know Lucas High, he is a good honest reporter. So this must be true. Anyone who does not believe Jeff Moss, Bill Miles and all our Town governments including Steve

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

suspicion. Fact, you lie once you will lie twice and much more. All 4 of you have to be either corrupted, never read the Reagan principal or just plan incompetent. Something is bad wrong and more reason for a forensic audit and law enforcement involvement. Our town officials are so corrupted, we need outside emergency help. We are in severe corrupted crisis. Mr Covert, to my knowledge is the only one out of these men who have a clue on how to run and build a local company. How could myself or others trust you in business, or buy air conditioning from you if you can't keep you campaign promises and force transparency? Mike wake up, you will sell more air conditioning units as a champion of tax payers, than you will as a influenced corrupted crook or in fear to not speak up and act and committing fraud not living up to your campaign promises. This is not the way to build your local business.

You said in the article:
"Council members Mike Covert, Rick Caporale, Tabor Vaux and Stu Rodman made the informal recommendation and were careful not to call for a "forensic" audit, which they say would hint at criminal wrongdoing.

Instead, the councilmen suggested what they refer to as an external audit, but offered few specifics on how deep the audit should go."

Then worse, and only someone either highly corrupted of incompetent would say Quote.

"Covert and Caporale, though, were adamantly against a forensic audit."

Can we get honesty from any of you, no games and fully explain your position and why ? Tell us how you plan to confirm we have no theft, fraud, embezzlement or credit card misuse? Why in the hell do you think an audit would just focus on credit cards? No one could be that clueless.

You all know and even an ignorant buffoon knows after all our education, a hired cookie cutter audit by crooks Jeff Moss, Bill Miles, Steve Riley, Gary Kubic and Marc Orlando are not designed to catch fraud, theft, embezzlement and credit card misuse, only a forensic audit does this. I believe the audits they hired will prove they purposely overlooked embezzlement, etc and like Berkeley SC school CFO and Palm Beach Cvb audit will prove this. Both their hired audits and many more in the USA, once forensically audited, prove an audit hired by a crook, versus independent audits are corrupted.

Perhaps you 4 men need to know, and more education, never in the history of the entire USA has a forensic audit been done on anyone who fights to not comply, or even volunteer to a forensic audit or an FBI investigation on a school system, Chamber, Town Government, City Dmo or Cvb where wrongdoing was not discovered and most cases resulted in prison.

So are you going to continue to be in denial, act like corrupted ignorant buffoons, or are you going to clean up your act, get tough and do what's right?

Do you 4 men really believe that no forensic audits are needed, after FBI raid on Berkeley sc School CFO 400k theft? Do you really think lying Jeff Moss is honest?

Read this Palm Beach audit or are you so corrupted and incompetent it makes no difference to you.

http://www.mypalmbeachclerk.com/uploadedFiles/Public_Funds/conv_ctr_audit_report.pdf

Do you think I am out of mind when I tell you Jeff Moss, Bill Miles, Ray Deal, Ray Warco and many others are going to prison once a forensic audit is done or a FBI raid happens? Do you 4 men actually believe a cooker cutter independent audit will catch fraud, theft and embezzlement? No one of normal thinking, could possibly believe this. The entire Beaufort county system and every single person who has access to or control of our tax dollars, needs to be forensically audited and seems now all of you included. Are you 4 men, worried about hurting someone's feelings? Perhaps you just all trust fellow man? If your answer is yes to these questions, you are more incompetent than I thought and about as useless of an elected official as we could have.
http://www.islandpacket.com/news/local/community/beaufort-news/article170793012.html

To end, you were all elected based on your campaign promises, that none of you have honored to date, you seem to all have intentionally committed fraud to local tax payers. So yes I am calling you all frauds along with the frauds, liars and thieves you now try to protect. Not one elected official or Mayor is forcing transparency, accountability or proven performance metrics in the entire Beaufort county. You are all weak gutless frauds. May God or the FBI help and save us in Beaufort county, seems our only 2 hopes. Don't count on God, he has a very busy schedule.
Thanks

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 27, 2017, at 1:02 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

prison. A bigger fish will be the Audit firm in Charleston, that Moss hired, as well as over 10 School districts around the state to do cookie cutter audits on billions of dollars. Based on what just happened in Berkeley sc with the School CFO theft of 400k and the Chamber embezzlement, does anyone on this email actually believe, including this School board, FBI, IRS and God himself, forencic audits will not discover massive corruption, fraud, embezzlement of millions across this state? There is only one reason any School board or Town council would not vote in favor of an audit, they are crooks 100%, either paid off, receive kick backs, outside jobs for friends or relatives, etc etc. It can't be based on incompetence, as no one could be this illiterate.

1.School board majority- refuses to vote for audit ?

2.Hilton Head Town Council -Refuses to vote for audit on proven crooks Bill miles or Steve Riley. John Mcann and other council members are proven crooks and liars. They are on record saying we saw the books no audit needed a lie, we trust everyone a lie, and finally a classic statement from a council member, "no audit we are scared of what we will find"

3.Beaufort Town Council refuses to vote for audit on all Chambers or Gary Kubic.

4 Bluffton Town council refuses to vote for audit on Marc Orlando and crook Lying Mayor Sulka. They both have been caught using Town employees illegally on tax payers paid time to profit a private corporation.

4 Sarah Borton refuses to allow the young reporters or editors to tell the real story on local corruption on her friends and large advertisers. USCB Jane Upshaw, Bill miles, Atax committee members, LCGOA her husband Brett Borton ran Connected to many local crooks. She refuses to report on all the lawsuits I have filed and filing. She deletes Blog post from any articles that favor me and my exposure.

5. Attorney general, SC ethics commission, Sled, Governor has done zero and in fact some of these under suspicion themselves.

6. Local elected officials Mark Sanford, Tim Scott, Tom davis, Weston Newton, Jeff Bradley and Bill Herbkersman have done zero. We need to face them at every public place where they speak and force them to answer our questions. They all need to be booted and publicly humiliated. Crook lawyer David Tigges of McNair law firm was appointed to the SC chamber board by crook and Lying Ted Pitts and David tigges secret lawyer for Steve Riley and lawyer for Bill miles fighting my Foia lawsuit in the Supreme Court. Crooked is an option understatement, imagine politicians say have not made up their minds yet?

http://www.postandcourier.com/news/bill-would-help-south-carolina-nonprofits-avoid-foia-requests-even/article_5b0ede4c-0b1d-11e7-9666-c7c6e3e329b0.html

7. Perhaps the most laughable and corrupt of all is all the Town councils in Beaufort county joined all the Chambers as members using our tax money. No Island Packet story on this? Who is a member just crook Steve Riley who wrote the checks, all council members ? Or all tax payers ? They all will not force as members, the Chambers to open their books to members under the sc non profit corporation act laws. They are all crooked. Sarah Borton will not report this ?

8. The law local Hilton head Chamber crooks Bill Miles and his appointed new puppet Chairman Jay weindl manager of the Sonesta Resort have denied a chamber membership to local lawyer Russ Keep, who is in good standing in this community for 40 yrs and known for his honesty and integrity. This is outrageous a Atax public funded Chamber, plus a Chamber Steve Riley joined would deny Russ Keep from becoming a member as they suspected he would demand access to the books under the sc non profit corporation act. They also denied me 3-4 yrs ago when crook Tom Upshaw past President of Palmetto Electric was Chamber Chairman. They now are denying a member Ryan McAvoy his request to the chamber books under his right as a member to full compliance under the SC non profit corporation act laws. Bill miles, Ray deal controller and Jay weindl are claiming his membership was denied after they fully accepted Ryan and cashed his check. Skip Hoagland was kicked out of the Beaufort Chamber for asking for access to the books under the sc non profit corporation act laws. I was denied membership in the SC Chamber, Myrtlebeach Chamber, Charleston Cvb. I was accepted by the Greater Bluffton Chamber, perfectly operated and will fully comply to Foia laws, non profit act laws etc.

Folks all has never happened to 3 local business people and one a lawyer, in 100 yr history in the entire USA. This could not be anymore criminal. Sarah Borton will not report it ?

Like I said citizens and tax payers in Beaufort county are surrounded by crooks in every corner. Even local judges tied to crooks. Incestous SC, perhaps there is no hope and only choice is to live with it and accept the fact this is the way it will be in SC. No transparency, no audits, limited Foia, no procurements, no non profit corporation act laws.

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Shocking ! Audit firm Bill miles hired JW hunt company in Columbia ,same audit firm as Charleston Cvb.
Bobby Creech auditor at this firm quits and now works for Bill miles accountant Ray Warco at Webster Rogers on Hilton Head?
John Mcann announces run for Mayor he is a liar
Kim Likins and lawyers caught stealing 200k to fund a private lawsuit.
David tigges , Bill miles lawyer secretly represents Steve riley.
Sarah Borton will not cover anything that does not slant to protect
The list goes on and on and on and on

My God we are all in trouble. Houston we have a problem !!!!

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

Begin forwarded message:

From: CC Hoagland <skiphoagland@yahoo.com>
Date: August 27, 2017 at 1:33:39 PM GMT-3
To: fran bisi <eyelandart@yahoo.com>, mark@marksanford.com, Tim Scott <joe_mckeown@scott.senate.gov>, jwiendl@sonesta.com, tecklenburgj@charleston-sc.gov, jrhodes@cityofmyrtlebeach.com, psommerville@bcgov.net
Cc: "Caporale, Rick" <rcaporale@bcgov.net>, "Orischak, Josephine A" <Josephine.Orischak@beaufort.k12.sc.us>, REBECCA BASS <muttleycrew2008@gmail.com>, Jim Bequette <jwbterp@aol.com>, Marilyn Bullard <bullardpiwko@aol.com>, jerry at the beach <gringoviejotwo@yahoo.com>, Tony Cambria <info@windrunnerstables.com>, "mkeel@sled.sc.gov" <mkeel@sled.sc.gov>, "Meyerhofer, Kelly" <kmeyerhofer@islandpacket.com>, "Gwozdz, Christina S" <Christina.Gwozdz@beaufort.k12.sc.us>, "Flewelling, Brian" <brianf@bcgov.net>, "Kinton, Geraldine C" <Geraldine.Kinton@beaufort.k12.sc.us>, "shannonerickson@schouse.org" <shannonerickson@schouse.org>, "johncrangle2@gmail.com" <johncrangle2@gmail.com>, "Stewart, Jerry" <jstewart@bcgov.net>, "Dawson, Gerald" <gdawson@bcgov.net>, Rick Brundrett <rbrundrett@islandpacket.com>, "michaelrivers@schouse.gov" <michaelrivers@schouse.gov>, "Campbell, Earl" <earl.campbell@beaufort.k12.sc.us>, "ami@ethics.sc.gov" <ami@ethics.sc.gov>, "jdpc@hargray.com" <jdpc@hargray.com>, "tom@senatortomdavis.com" <tom@senatortomdavis.com>, "Dunkle, Joseph R" <Joseph.Dunkle@beaufort.k12.sc.us>, "taylor@harrisonfirm.com" <taylor@harrisonfirm.com>, Liz Farrell <efarrell@islandpacket.com>, "Staton, Jennifer A" <Jennifer.Staton@beaufort.k12.sc.us>, "pgrant@sled.sc.gov" <pgrant@sled.sc.gov>, "tmbdab@aol.com" <tmbdab@aol.com>, "marksanford99@gmail.com" <marksanford99@gmail.com>, "Fobes, Steve" <sfobes@bcgov.net>, Joseph Iaco <jiaco@bellsouth.net>, "Rodman, Stewart" <srodman@bcgov.net>, "awilson@scag.gov" <awilson@scag.gov>, "Spiker149@hargray.com" <Spiker149@hargray.com>, "wnewton@jsplaw.net" <wnewton@jsplaw.net>, "cnrgbr@hargray.com" <cnrgbr@hargray.com>, "deann.komanecky@blufftontoday.com" <deann.komanecky@blufftontoday.com>, "zoomru@yahoo.com" <zoomru@yahoo.com>, "Gregory, Cynthia W" <Cynthia.Gregory@beaufort.k12.sc.us>, John Dowling <dowlingjohn287@gmail.com>, "rgregory@sled.sc.gov" <rgregory@sled.sc.gov>, "shamm@ethics.sc.gov" <shamm@ethics.sc.gov>, "jbagnall@ethics.sc.gov" <jbagnall@ethics.sc.gov>, "Cordray, Mary M" <Mary.Cordray@beaufort.k12.sc.us>, "jeffbradley@schouse.gov" <jeffbradley@schouse.gov>, "dwilliams@sled.sc.gov" <dwilliams@sled.sc.gov>, "mburchstead@ethics.sc.gov" <mburchstead@ethics.sc.gov>, "usn1066@gmail.com" <usn1066@gmail.com>, "lgibson@scag.gov" <lgibson@scag.gov>, "Crosby, Tonya V" <Tonya.Crosby@beaufort.k12.sc.us>, "aldenbauer706@gmail.com" <aldenbauer706@gmail.com>, "Cushingberry, Robyn L" <Robyn.Cushingberry@beaufort.k12.sc.us>, "contact@beaufortwatchdog.org" <contact@beaufortwatchdog.org>, "Payne, Wilbur M" <Wilbur.Payne@beaufort.k12.sc.us>, Auditor <auditor@bcgov.net>, "Striebinger, David R" <David.Striebinger@beaufort.k12.sc.us>, "Covert, Michael" <mcovert@bcgov.net>, tdavis@harveyandbattey.com, "William G. Bill Herbkersman" <schsdistrict118@aol.com>, John Munro <JMunro@seapines.com>, Steve Birdwell <sbirdwell@seapines.com>, gerard mahieu <gerardmahieu@aol.com>, Marc Frey <mfrey@freymedia.com>, Sarah Borton Sarah Borton <sgillis@islandpacket.com>, Jay Bender <jbender@brblegal.com>, Dave Schwartz <dave@scpolicycouncil.org>, Jim Carpenter <james.carpenter@carpenterlawfirm.net>, Cynthia Bensch <bensch@hargray.com>, David Ames <amesco@earthlink.net>, Lee Bright <Lee@brightagencyinc.com>, Russ Keep <hhlaw@hargray.com>, joeborelli1@mac.com, Justin New Orleans Lawyer Justin New Orleans Lawyer <jwinch@smithstag.com>, Art Davis <art@globallylocally.com>, Jeremia Froyland <jeremiafroyland@gmail.com>, josh metnick <josh@chicago.com>, Fred Mercaldo <fred@scottsdale.com>, Austin Andrukaitis <austinandrukaitis@gmail.com>, John Keener <john@charlestoncrabhouse.com>, John Durst <john@scrla.org>, nancy watt <wtghhi@aol.com>, linda rew <linda@hiltonhead.com>, dan@media360.com, eric@laislamagazine.com, Ryan McAvoy <mcavoylegend@gmail.com>
Subject: May God help us !!!! same audit firm as Jeff Moss hired was just hired as new audit firm by Berkeley School system after FBI discovered 400k theft. Houston we have a problem!!!!

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Read link below, oh my God new audit firm for Berkeley county Schools the FBI just discovered 400k in theft on, Berkeley school board just hired the same firm Jeff moss and ten others hired ? No procurement? No clue this firm like their last firm that missed the 400k theft, is under suspicion of missing theft/ misuse by Jeff Moss.
Folks we are in big trouble !

Again the full time employees and lawyers have seized total control from the few honest and mostly corrupted Part time board members. I know of no successful company where the employees tell the owners what to do and worse refuse the owners access to see the books ? This is simply massive insanity and an extremely broken and failed system. Only one act will work under this Broken system, a Forencic audit and FBI / IRS investigation. No one in SC can be trusted no one. Reagan theory only!

It is very sad to watch so many good people fight so hard to try and win against all this corruption without an audit. There is zero chance of victory without it. Moss and his full time lawyer, along with those they have corrupted on the board, will never be stopped without being forced to audit. Then the question becomes who gets hired to do the forensic audit that can be trusted in SC. This will need to be out of state or better all overseen and done in alliance with the FBI investigation like Berkeley SC.

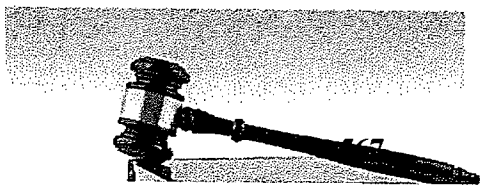
My God again our investigative team just discovered Berkeley county just hired a new audit firm and same firm Jeff Moss hired. This firm once audited like Palm beach and the last audit firm will also turn out to have missed massive corruption by Jeff Moss. The question is, and FBI needs to act, will this firm and its auditors be tied to the corruption and embezzlement ? Houston we have a problem ? How is it possible FBI catches this theft and now the Jeff moss hired audit firm is hired by the Berkeley school board ?

https://www.berkeleyind.com/news/school-board-agrees-on-new-auditor/article_ddb0077e-35c8-11e7-acac-2f2854e94e89.html

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 27, 2017, at 10:38 AM, Orischak, Josephine A <Josephine.Orischak@beaufort.k12.sc.us> wrote:

> Jerry,
>
> Regarding our new meeting structure, Joseph Dunkle's reservations about it not providing adequate time to discuss topics are most relevant. Look at it this way: the board previously had six committees, four of which met monthly/regularly for (approximately) 2 hours each. That's **8 hours** worth of discussion of **important issues** that was taking place each month. This estimate doesn't even include the two committees (HR and Legislative) that met periodically, as well.
>
> We've now cut that monthly discussion time literally in half down to **4 hours.**
>
> While we all appreciate the notion of reducing meeting costs, I am not sure how valid this argument is now that we know the potential costs of upgrading central office's video recording capabilities.
>
> In summary, the Board (in whole or part) will only be publicly gathered twice monthly now. As such, my greatest concern remains that the Board will be asked to vote/take action with considerably less time to discuss/vet important issues.
>
> JoAnn Orischak
> District 11
>
> Sent from my iPad
>
> On Aug 27, 2017, at 8:13 AM, "jerry at the beach" <gringoviejotwo@yahoo.com> wrote:
>
> > More money? Less transparency? The effects of Beaufort County school board's meeting changes
> >
> > 

More money? Less transparency? The effects of Beaufort County school boa...

Changes to Beaufort County Board of Education meetings in South Carolina could cost the district more money and,...

Board member Kinton said: *"Eliminating committee meetings will save the district money, argued Kinton, who spearheaded the overhaul of the meeting format."*

When Candidate Kinton was asked; What specific steps will you take to make government more open and accessible to the public?

Candidate Kinton said: *"I believe the school board should govern by committees that include community members. Committees should be charged with researching topics, hearing recommendations from administration, challenging administration recommendations when appropriate and making final recommendations to the full school board. Board committees will provide more opportunities for parents, citizens and stakeholders to become engaged, informed and involved in the process of educating our children."*

Oh, my! Read it again folks, and if you don't believe me, here is the link.
http://www.islandpacket.com/news/politics-government/election/article33484737.html#storylink=cpy

G.A. Smith
Well represented in Dist. 11

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 31, 2017, at 7:32 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> It's time to get serious and do what's right . The corruption, lack of transparency, accountability, proven performance metrics, lies, secrecy and denial must end. If our County officials will not act, then we need to get state and federal authorities to force them. This crisis must end !!!
> It's time to now file a lawsuit. Please everyone send me your ideas for this. Beaufort Watch Dog will pay all cost !

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

page1image256

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 28, 2017, at 4:20 AM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> I will address the "audit" for those not copied on my last email. A financial audit performed by an independent accounting firm is addressing the financial condition at a given point in time. Their primary focus is to determine if the income statement and balance sheet is a fair reflection of the financial condition and performance**when taken as a whole**. If you read the supplemental opinion, that is what the accountant is saying. He is not giving an opinion as to the proper allocations of income and expenses. Therefore, in order to establish the true income and expense from each activity you must see a detailed general ledger and other documents and records to make our own determination as to the true allocation of income and expenses and thus the unrelated business income. The schedules attached to these financial statements reflect exactly -0- for the net income from each activity other than members services. As any reasonable person would know, this is not possible.
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

On Jul 28, 2017, at 4:00 AM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> I would like to address the UBI issue from the earlier emails. Most of the 90 or so whistleblower filings I have filed on Cvbs Chambers city Dmos report no or very little UBI. This is because they offset the income with the cost to produce this income. They are incurring labor cost to develop the webpage for the local chamber and CVB which promotes the city while also producing advertisements for businesses willing to pay them to be listed. These same employees are utilized to develop the site to book hotel rooms and flights etc. Their 990s frequently show exactly -0- for UBI. Others show losses while a few show some small profits. (Only a couple reflect any significant UBI) If a CVB shows a loss, then it means that membership dues or government funding subsidized these efforts. The problem remains that almost none of them make any effort to split our their labor and other costs to produce the UBI. Therefore we do not know how much they are truly making or even what their gross revenue is from these activities. If for example they received $10M from advertisers and from booking revenues and only $5M from membership dues and state and federal grants, they might show -0- unrelated business income due to how they allocate expenses. The CVB's and Chambers will spend all they get as there is no profit motive.
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202
>
> On Jul 27, 2017, at 6:37 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:
>
> > Cookie cutter audits are not meant to catch crimes. This is why our state is in trouble. Never in the 100 year history
> > has any School districts, chambers and towns been forensically audited.
> > Berkeley county SC first one on Sc. Those in other states that have refused forencic audits and then forced or investigated by the FBI IRS investigations have mostly resulted in prison. Here is your answer. Palm beach type audits
> >
> > Sent from my iPhone excuse all typos and misspellings
> >
> > Skip Hoagland
> > US cell 843-384-7260
> > Buenos Aires , Argentina
> > 011-54-9-11-5942-3202
> >
> > On Jul 27, 2017, at 5:59 PM, fran bisi <eyelandart@yahoo.com> wrote:
> >
> > > I think what you have attached isn't referring to a forensic audit, but a CAFR that Moss was referring to...AKA Cookie Cutter.
> > >
> > > ***fran***
> > >
> > > On Thursday, July 27, 2017 5:22 PM, "Caporale, Rick" <rcaporale@bcgov.net> wrote:
> > >
> > > Fran:
> > >
> > > When we think or talk about audits, we should all recall the role (complicity?) of auditing firms in the financial meltdown.
> > > A few of whom are no longer in

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Worthless") is worth a quick read.

RC

From: fran bisi [eyelandart@yahoo.com]
Sent: Thursday, July 27, 2017 4:19 PM
To: Orischak, Josephine A; REBECCA BASS
Cc: Jim Bequette; Marilyn Bullard; jerry at the beach; Tony Cambria; mkeel@sled.sc.gov; Meyerhofer, Kelly; Gwozdz, Christina S; Flewelling, Brian; Kinton, Geraldine C; shannonerickson@schouse.org; johncrangle2@gmail.com; Stewart, Jerry; Dawson, Gerald; Rick Brundrett; skiphoagland@yahoo.com; michaelrivers@schouse.gov; Campbell, Earl; ami@ethics.sc.gov; jdpc@hargray.com; joe_mckeown@scott.senate.gov; tom@senatort Dunkle, Joseph R; taylor@harrisonfirm.com; Liz Farrell; Staton, Jennifer A; pgrant@sled.sc.gov; tmbdab@aol.com; marksanford99@gmail.com; Fobes, Steve; Joseph Iaco; Caporale, Rick; Rodman, Stewart; awilson@scag.gov; Spiker149@hargray.com; wnewton@jsplaw.net; cnrgbr@hargray Gregory, Cynthia W; John Dowling; rgregory@sled.sc.gov; shamm@ethics.sc.gov; jbagnall@ethics.sc.gov; Cordray, Mary M; jeffbradley@schouse.gov; dwilliams@sled.sc.gov; mburchstead@ethics.sc.gov; usn1066@ Crosby, Tonya V; aldenbauer706@gmail.com; Cushingberry, Robyn L; contact@beaufortwatchdog.org; Payne, Wilbur M; Auditor; Striebinger, David R; Covert, Michael
Subject: Re: Moss Letter to editor July 26,2017 @5:13

If I'm correct they "selected 40 transactions" for Fiscal Year 2016. They were "examined for compliance with the District's procurement policy and not exceptions were noted." Whatever that means, I'm not impressed. That's less than a day's worth of transactions.

Example: on Jan 5th and 6th of 2016 there were 37 transactions and that's not counting those under $100.

Is this what he calls an audit?

fran

On Thursday, July 27, 2017 1:53 PM, "Orischak, Josephine A" <Josephine.Orischak@beaufort.k12.sc.us> wrote:

All,

FYI: Here is a link to the BCSD website for Procurement Audits performed from 2013 to the present. Open the 'Other Financial Reports' folder to view.

http://beaufortschools.net/cms/one.aspx?portalId=170925&pageId=296554

JoAnn Orischak
Beaufort County Board of Education
District 11
Hilton Head Island
C. (843) 338-1737

Sent from my iPad

<muttleycrew2008@gmail.com<mailto:muttleycrew2008@gmail.com>>
wrote:

In his letter, Moss does say "they are reviewed each year by a pair of separate independent audits". We should request copies of these audits and ask who conducted them.

Rebecca

On Thu, Jul 27, 2017 at 9:25 AM, Jim Bequette
<jwbterp@aol.com<mailto:jwbterp@aol.com>>
wrote:

I am attaching a letter written by the Superintendent which was printed in last night's internet edition of the Packet/Gazette. Moss asserts that letter writers have asserted that "Beaufort County School District employees have misused tax dollars" using district credit cards. He then states "nothing could be further from the truth".

Why does he not promote having a forensic audit to assure us taxpayers that his statement is factual? Why aren't we given all the facts on the admitted 47 fraudulent charges on those card?. Who did the two separate independent "reviews" of P-card that he cites in this letter? Note he doesn't say audits. I will submit an FOIA request for the "reviews".

I read the county government spends about $1 million a year on credit cards while the School District is up about $25 million. The county budget is smaller than 1/2 of the school's.

Many, many charges on those P-cards as reported by Fran Bisi look very questionable. Superintendent Moss can only quiet down the public uproar by immediately having the Board approve a forensic audit. How can you take his statements as fact after he was already found in two ethics violations?

Last I would like to commend Fran Bisi for her great work in exposing what could be a monumental problem. However if Moss and the Board do not approve a forensic audit, the citizens will never know the truth or trust them.

Jim Bequette Retired CPA in Md, WV, and SC

--
Rebecca W. Bass
Broker in Charge
SeaBass Properties Real Estate
Licensed in South Carolina and Georgia
843-263-3772

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires, Argentina

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

On Aug 27, 2017, at 1:33 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

Read link below, oh my God new audit firm for Berkeley county Schools the FBI just discovered 400k in theft on, Berkeley school board just hired the same firm Jeff moss and ten others hired ? No procurement? No clue this firm like their last firm that missed the 400k theft, is under suspicion of missing theft/ misuse by Jeff Moss.
Folks we are in big trouble !

Again the full time employees and lawyers have seized total control from the few honest and mostly corrupted Part time board members. I know of no successful company where the employees tell the owners what to do and worse refuse the owners access to see the books ? This is simply massive insanity and an extremely broken and failed system. Only one act will work under this Broken system, a Forencic audit and FBI / IRS investigation. No one in SC can be trusted no one. Reagan theory only!

It is very sad to watch so many good people fight so hard to try and win against all this corruption without an audit. There is zero chance of victory without it. Moss and his full time lawyer, along with those they have corrupted on the board, will never be stopped without being forced to audit. Then the question becomes who gets hired to do the forensic audit that can be trusted in SC. This will need to be out of state or better all overseen and done in alliance with the FBI investigation like Berkeley SC.

My God again our investigative team just discovered Berkeley county just hired a new audit firm and same firm Jeff Moss hired. This firm once audited like Palm beach and the last audit firm will also turn out to have missed massive corruption by Jeff Moss. The question is, and FBI needs to act, will this firm and its auditors be tied to the corruption and embezzlement ? Houston we have a problem ? How is it possible FBI catches this theft and now the Jeff moss hired audit firm is hired by the Berkeley school board ?

https://www.berkeleyind.com/news/school-board-agrees-on-new-auditor/article_ddb0077e-35c8-11e7-acac-2f2854e94e89.html

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 27, 2017, at 10:38 AM, Orischak, Josephine A <Josephine.Orischak@beaufort.k12.sc.us> wrote:

Jerry,

Regarding our new meeting structure, Joseph Dunkle's reservations about it not providing adequate time to discuss topics are most relevant. Look at it this way: the board previously had six committees, four of which met monthly/regularly for (approximately) 2 hours each. That's **8 hours** worth of discussion of **important issues** that was taking place each month. This estimate doesn't even include the two committees (HR and Legislative) that met periodically, as well.

We've now cut that monthly discussion time literally in half down to **4 hours.**

While we all appreciate the notion of reducing meeting costs, I am not sure how valid this argument is now that we know the potential costs of upgrading central office's video recording capabilities.

In summary, the Board (in whole or part) will only be publicly gathered twice monthly now. As such, my greatest concern remains that the Board will be asked to vote/take action with considerably less time to discuss/vet important issues.

JoAnn Orischak
District 11

Sent from my iPad

On Aug 27, 2017, at 8:13 AM, "jerry at the beach" <gringoviejotwo@yahoo.com> wrote:

More money? Less transparency? The effects of Beaufort County school board's meeting changes

More money? Less transparency? The effects of Beaufort County school boa...

Changes to Beaufort County Board of Education meetings in South Carolina could cost the district more money and,...

Board member Kinton said: *"Eliminating committee meetings will save the district money, argued Kinton, who spearheaded the overhaul of the meeting format."*

When Candidate Kinton was asked; What specific steps will you take to make government more open and accessible to the public?

Candidate Kinton said: *"I believe the school board should govern by committees that include community members. Committees should be charged with researching topics, hearing recommendations from administration, challenging administration recommendations when appropriate and making final recommendations to the full school board. Board committees will provide more opportunities for parents, citizens and stakeholders to become engaged, informed and involved in the process of educating our children."*

Oh, my! Read it again folks, and if you don't believe me, here is the link.
http://www.islandpacket.com/news/politics-government/election/article33484737.html#storylink=cpy

G.A. Smith
Well represented in Dist. 11

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

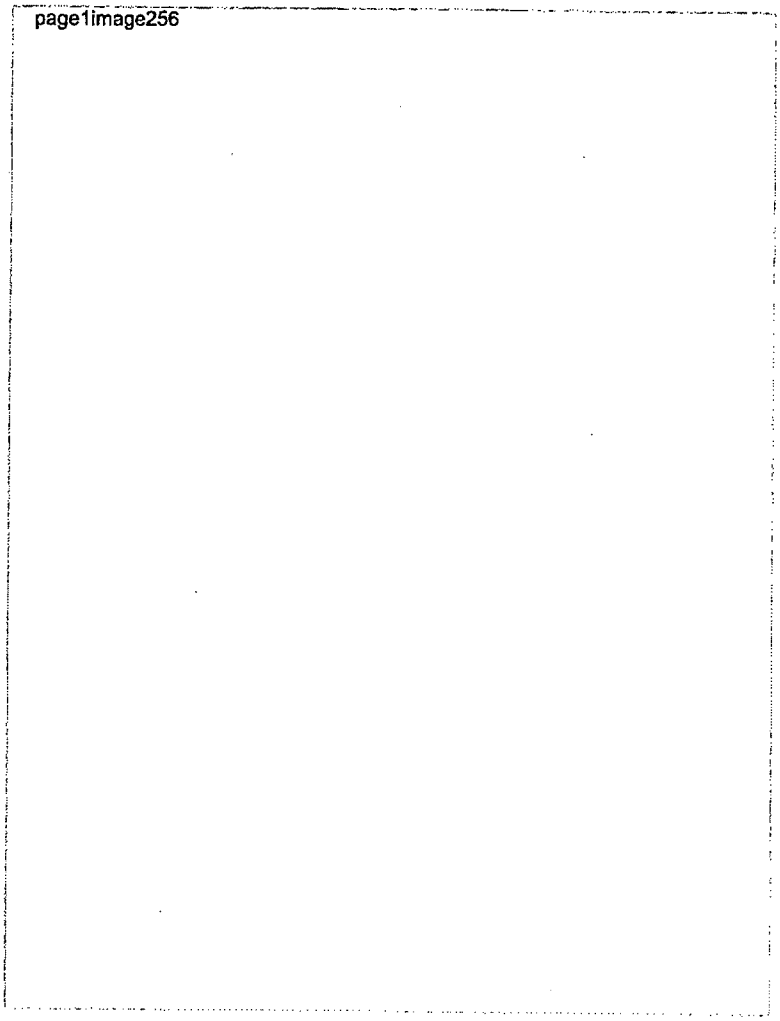
On Jul 31, 2017, at 7:32 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> It's time to get serious and do what's right . The corruption, lack of transparency, accountability, proven performance metrics, lies, secrecy and denial must end. If our County officials will not act, then we need to get state and federal authorities to force them. This crisis must end !!!
> It's time to now file a lawsuit. Please everyone send me your ideas for this. Beaufort Watch Dog will pay all cost !

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

page1image256



Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 28, 2017, at 4:20 AM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> I will address the "audit" for those not copied on my last email. A financial audit performed by an independent accounting firm is addressing the financial condition at a given point in time. Their primary focus is to determine if the income statement and balance sheet is a fair reflection of the financial condition and performance**when taken as a whole**. If you read the supplemental opinion, that is what the accountant is saying. He is not giving an opinion as to the proper allocations of income and expenses. Therefore, in order to establish the true income and expense from each activity you must see a detailed general ledger and other documents and records to make our own determination as to the true allocation of income and expenses and thus the unrelated business income. The schedules attached to these financial statements reflect exactly -0- for the net income from each activity other than members services. As any reasonable person would know, this is not possible.
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

On Jul 28, 2017, at 4:00 AM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> I would like to address the UBI issue from the earlier emails. Most of the 90 or so whistleblower filings I have filed on Cvbs Chambers city Dmos report no or very little UBI. This is because they offset the income with the cost to produce this income. They are incurring labor cost to develop the webpage for the local chamber and CVB which promotes the city while also producing advertisements for businesses willing to pay them to be listed. These same employees are utilized to develop the site to book hotel rooms and flights etc. Their 990s frequently show exactly -0- for UBI. Others show losses while a few show some small profits. (Only a couple reflect any significant UBI) If a CVB shows a loss, then it means that membership dues or government funding subsidized these efforts. The problem remains that almost none of them make any effort to split our their labor and other costs to produce the UBI. Therefore we do not know how much they are truly making or even what their gross revenue is from these activities. If for example they received $10M from advertisers and from booking revenues and only $5M from membership dues and state and federal grants, they might show -0- unrelated business income due to how they allocate expenses. The CVB's and Chambers will spend all they get as there is no profit motive.
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

On Jul 27, 2017, at 6:37 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> Cookie cutter audits are not meant to catch crimes. This is why our state is in trouble. Never in the 100 year history
> has any School districts, chambers and towns been forensically audited.
> Berkeley county SC first one on Sc. Those in other states that have refused forencic audits and then forced or investigated by the FBI IRS investigations have mostly resulted in prison. Here is your answer. Palm beach type audits
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

On Jul 27, 2017, at 5:59 PM, fran bisi <eyelandart@yahoo.com> wrote:

> I think what you have attached isn't referring to a forensic audit, but a CAFR that Moss was referring to...AKA Cookie Cutter.
>
> ***fran***
>
> On Thursday, July 27, 2017 5:22 PM, "Caporale, Rick" <rcaporale@bcgov.net> wrote:
>
> Fran:
>
> When we think or talk about audits, we should all recall the role (complicity?) of auditing firms in the financial meltdown. A few of whom are no longer in business. Have we forgotten so soon?

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

RC

From: fran bisi [eyelandart@yahoo.com]
Sent: Thursday, July 27, 2017 4:19 PM
To: Orischak, Josephine A; REBECCA BASS
Cc: Jim Bequette; Marilyn Bullard; jerry at the beach; Tony Cambria; mkeel@sled.sc.gov; Meyerhofer, Kelly; Gwozdz, Christina S; Flewelling, Brian; Kinton, Geraldine C; shannonerickson@schouse.org; johncrangle2@gmail.com; Stewart, Jerry; Dawson, Gerald; Rick Brundrett; skiphoagland@yahoo.com; michaelrivers@schouse.gov; Campbell, Earl; ami@ethics.sc.gov; jdpc@hargray.com; joe_mckeown@scott.senate.gov; tom@senatortomdavis.com; Dunkle, Joseph R; taylor@harrisonfirm.com; Liz Farrell; Staton, Jennifer A; pgrant@sled.sc.gov; tmbdab@aol.com; marksanford99@gmail.com; Fobes, Steve; Joseph Iaco; Caporale, Rick; Rodman, Stewart; awilson@scag.gov; Spiker149@hargray.com; wnewton@jsplaw.net; cnrgbr@hargray.com; deann.komanecky@blufftontoday.com; zoomru@yahoo.com; Gregory, Cynthia W; John Dowling; rgregory@sled.sc.gov; shamm@ethics.sc.gov; jbagnall@ethics.sc.gov; Cordray, Mary M; jeffbradley@schouse.gov; dwilliams@sled.sc.gov; mburchstead@ethics.sc.gov; usn1066@gmail.com; lgibson@scag.gov; Crosby, Tonya V; aldenbauer706@gmail.com; Cushingberry, Robyn L; contact@beaufortwatchdog.org; Payne, Wilbur M; Auditor; Striebinger, David R; Covert, Michael
Subject: Re: Moss Letter to editor July 26,2017 @5:13

If I'm correct they "selected 40 transactions" for Fiscal Year 2016. They were "examined for compliance with the District's procurement policy and not exceptions were noted." Whatever that means, I'm not impressed.
That's less than a day's worth of transactions.

Example: on Jan 5th and 6th of 2016 there were 37 transactions and that's not counting those under $100.

Is this what he calls an audit?

fran

On Thursday, July 27, 2017 1:53 PM, "Orischak, Josephine A" <Josephine.Orischak@beaufort.k12.sc.us> wrote:

All,

FYI: Here is a link to the BCSD website for Procurement Audits performed from 2013 to the present. Open the 'Other Financial Reports' folder to view.

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

JoAnn Orischak
Beaufort County Board of Education
District 11
Hilton Head Island
C. (843) 338-1737

Sent from my iPad

On Jul 27, 2017, at 9:36 AM,
"REBECCA BASS"
<muttleycrew2008@gmail.com<mailto:muttleycrew2008@gmail.com>>
wrote:

In his letter, Moss does say "they are reviewed each year by a pair of separate independent audits". We should request copies of these audits and ask who conducted them.

Rebecca

On Thu, Jul 27, 2017 at 9:25 AM, Jim Bequette
<jwbterp@aol.com<mailto:jwbterp@aol.com>>
wrote:

I am attaching a letter written by the Superintendent which was printed in last night's internet edition of the Packet/Gazette. Moss asserts that letter writers have asserted that "Beaufort County School District employees have misused tax dollars" using district credit cards. He then states "nothing could be further from the truth".

Why does he not promote having a forensic audit to assure us taxpayers that his statement is factual? Why aren't we given all the facts on the admitted 47 fraudulent charges on those card?. Who did the two separate independent "reviews" of P-card that he cites in this letter? Note he doesn't say audits. I will submit an FOIA request for the "reviews".

I read the county government spends about $1 million a year on credit cards while the School District is up about $25 million. The county budget is smaller than 1/2 of the school's.

Many, many charges on those P-cards as reported by Fran Bisi look very questionable. Superintendent Moss can only quiet down the public uproar by immediately having the Board approve a forensic audit. How can you take his statements as fact after he was already found in two ethics violations?

Last I would like to commend Fran Bisi for her great work in exposing what could be a monumental problem. However if Moss and the Board do not approve a forensic audit, the citizens will never know the truth or trust them.

Jim Bequette Retired CPA in Md, WV, and SC

--
Rebecca W. Bass
Broker in Charge
SeaBass Properties Real Estate
Licensed in South Carolina and Georgia

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

From: **Skip Hoagland** shoagland@me.com

Subject: Christmas Theft versus Gift Skip Hoagland to file another lawsuit against the Town of Hilton head 2018 for allowing theft and unconstitutional misuse of atax funds by Private non profits and the city Dmo chamber

Date: December 23, 2017 at 1:57 PM America/New_York

To: davidb@hiltonheadislandsc.gov, jerry at the beach gringoviejotwo@yahoo.com, marksanford99@gmail.com, sarah borton sborton@islandpacket.com, linda rew linda@hiltonhead.com, dan@media360.com, eric@laislamagazine.com, bortonb@uscb.edu, David Lauderdale letters@islandpacket.com, Will Folks will.folks@gmail.com, david@myrtlebeachsc.com, eriggs949@gmail.com, wegmannj@beaufortlaw.com, Sarah Sanford sarahsanford@palmettobluffonline.com, srawls@clawsonandstaubes.com, Barrett Brewer BBrewer@clawsonandstaubes.com, gregg@alfordlawsc.com, Brian Tolley btolley@islandpacket.com, dlauderdale@islandpacket.com, tmoss@islandpacket.com, Gina Smith gsmith@islandpacket.com, stever@hiltonheadislandsc.gov, joseph.dunkle@beaufort.k12.sc.us, Josephine.Orischak@beaufort.k12.sc.us, John Dowling dowlingjohn287@gmail.com, John Crangle johncrangle2@gmail.com

Cc: Alden Bauer aldenbauer706@gmail.com, fran bisi eyelandart@yahoo.com, mark@marksanford.com, Tim Scott joe_mckeown@scott.senate.gov, jwiendl@sonesta.com, tecklenburgj@charleston-sc.gov, jrhodes@cityofmyrtlebeach.com, psommerville@bcgov.net, "Caporale, Rick" rcaporale@bcgov.net, "Orischak, Josephine A" Josephine.Orischak@beaufort.k12.sc.us, REBECCA BASS muttleycrew2008@gmail.com, Jim Bequette jwbterp@aol.com, Marilyn Bullard bullardpiwko@aol.com, Tony Cambria info@windrunnerstables.com, "mkeel@sled.sc.gov" mkeel@sled.sc.gov, "Meyerhofer, Kelly" kmeyerhofer@islandpacket.com, "Gwozdz, Christina S" Christina.Gwozdz@beaufort.k12.sc.us, "Flewelling, Brian" brianf@bcgov.net, "Kinton, Geraldine C" Geraldine.Kinton@beaufort.k12.sc.us, "shannonerickson@schouse.org" shannonerickson@schouse.org, "johncrangle2@gmail.com" johncrangle2@gmail.com, "Stewart, Jerry" jstewart@bcgov.net, "Dawson, Gerald" gdawson@bcgov.net, Rick Brundrett rbrundrett@islandpacket.com, "michaelrivers@schouse.gov" michaelrivers@schouse.gov, "Campbell, Earl" earl.campbell@beaufort.k12.sc.us, "ami@ethics.sc.gov" ami@ethics.sc.gov, "jdpc@hargray.com" jdpc@hargray.com, "tom@senatortomdavis.com" tom@senatortomdavis.com, "Dunkle, Joseph R" Joseph.Dunkle@beaufort.k12.sc.us, Liz Farrell efarrell@islandpacket.com, "Staton, Jennifer A" Jennifer.Staton@beaufort.k12.sc.us, "pgrant@sled.sc.gov" pgrant@sled.sc.gov, "tmbdab@aol.com" tmbdab@aol.com, "Fobes, Steve" sfobes@bcgov.net, Joseph Iaco jiaco@bellsouth.net, "Rodman, Stewart" srodman@bcgov.net, "awilson@scag.gov" awilson@scag.gov, "Spiker149@hargray.com" Spiker149@hargray.com, "wnewton@jsplaw.net" wnewton@jsplaw.net, "cnrgbr@hargray.com" cnrgbr@hargray.com, "deann.komanecky@blufftontoday.com" deann.komanecky@blufftontoday.com, "zoomru@yahoo.com" zoomru@yahoo.com, "Gregory, Cynthia W" Cynthia.Gregory@beaufort.k12.sc.us, John Dowling dowlingjohn287@gmail.com, "rgregory@sled.sc.gov" rgregory@sled.sc.gov, "shamm@ethics.sc.gov" shamm@ethics.sc.gov, "jbagnall@ethics.sc.gov" jbagnall@ethics.sc.gov, "Cordray, Mary M" Mary.Cordray@beaufort.k12.sc.us, "jeffbradley@schouse.gov" jeffbradley@schouse.gov, "dwilliams@sled.sc.gov" dwilliams@sled.sc.gov, "mburchstead@ethics.sc.gov" mburchstead@ethics.sc.gov, "usn1066@gmail.com" usn1066@gmail.com, "lgibson@scag.gov" lgibson@scag.gov, "Crosby, Tonya V" Tonya.Crosby@beaufort.k12.sc.us, "Cushingberry, Robyn L" Robyn.Cushingberry@beaufort.k12.sc.us, "contact@beaufortwatchdog.org" contact@beaufortwatchdog.org, "Payne, Wilbur M" Wilbur.Payne@beaufort.k12.sc.us, Auditor auditor@bcgov.net, "Striebinger, David R" David.Striebinger@beaufort.k12.sc.us, "Covert, Michael" mcovert@bcgov.net, Tom Davis tdavis@harveyandbattey.com, "William G. Bill Herbkersman" schsdistrict118@aol.com, John Munro JMunro@seapines.com, Steve Birdwell sbirdwell@seapines.com, gerard mahieu gerardmahieu@aol.com, Marc Frey mfrey@freymedia.com, Sarah Borton Sarah Borton sgillis@islandpacket.com, Dave Schwartz dave@scpolicycouncil.org, Jim Carpenter james.carpenter@carpenterlawfirm.net, Cynthia Bensch bensch@hargray.com, David Ames amesco@earthlink.net, Lee Bright Lee@brightagencyinc.com, Russ Keep hhlaw@hargray.com, joeborelli1@mac.com, Justin New Orleans Lawyer Justin New Orleans Lawyer jwinch@smithstag.com, Art Davis art@globallylocally.com, Jeremia Froyland jeremiafroyland@gmail.com, josh metnick josh@chicago.com, Fred Mercaldo fred@scottsdale.com, Austin Andrukaitis austinandrukaitis@gmail.com, John Keener john@charlestoncrabhouse.com, John Durst john@scrla.org, nancy watt wtghhi@aol.com, Will Folks will.folks@gmail.com, david@myrtlebeachsc.com, david tigges

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

dtigges@mcnair.net, Barrett Brewer BBrewer@clawsonandstaubes.com, Billy Keyserling billyk@islc.net, tvaux@bcgov.net, Joe And Chris Joe And Chris cjpvap01@aol.com, Joe Duboise joe@lowcountrylegal.com, Larry Myers Meyersteamrealty@gmail.com, Karl Engelman karl@engelman.org, Ryan McAvoy mcavoylegend@gmail.com, peter@mediafeedia.com, Taylor@harrisonfirm.com, Jay Bender jbender@brblegal.com

Well this council just gave the tax payers another Christmas theft, versus a gift.
Mr Riley you and your crooked lying council majority will have another lawsuit filed against you. This highly corrupted incompetent Town council is allowing theft and unconstitutional misuse of our public funds for private purpose . The SC law is clear, you can't keep issuing tens of millions of Atax funds and even our general tax monies for private use, and worse allowing private profit in violations or state laws and federal Irs 501-c6 tax codes. Public Atax funds and all tax monies can only be used and issued for the public good, use and benefit. Many recipients on the Atax list are private, and worse no audits, transparency, accountability or oversight. The Dmo listed on your Atax list cleverly hides and you put down as Town of Hilton head for the 1.6m in Atax funds versus City Dmo currently the Chamber. Where was the procurement this year you were sued for ?

You keep refusing to respect the professionals who address you all, this entire council has a false sense of knowledge and superiority sitting on this Dias. You all keep forgetting you are Public servants who work for the tax payers. You are supposed to spend and protect tax monies like you own, not steal tax monies and allow others to as well. You also keep listening to incompetent Town Lawyers Gregg Alford and Brian Hulbert who keep getting you in trouble and sued. They should all be fired and sued for malpractice, Steve riley terminated and all investigated by the FBI for criminal theft of our tax monies and allowing fraud by Atax recipients. In fact we need an FBI investigation of this entire town and council. I am confident this will happen at some point in time. How we ended up with so many incompetent, crooked and corrupted officials in SC is a hard for many to imagine.

Subject: Supreme Court Case

http://www.sccourts.org/opinions/HTMLFiles/SC/27738.pdf

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 18, 2017, at 7:10 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 18, 2017, at 8:04 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> Once a Forencic audit is done of the following people in Beaufort county, we can restore our county back to a civil local society operated under the law. We have no law and order. All these people who have control and access to all our tax funds, must be not just forensically audited, but investigated. What has happen is we have allowed these employees to seize 100% control from part time local officials, who are supposed to represent our interest and be good stewards of our tax money, they have failed us all miserably. We have zero oversight by anyone.
>
> Our political system made up of part time elected officials with no one in charge, including our weak Mayors who can't even hire or fire, and only has one vote. The majority councils have become so corrupted that basically they assist Jeff Moss, Bill miles and Town managers to rob us blind. We are in deep crisis and many are in denial. I am trying to say what others think, and are in fear of saying. If I do not speak for up for this community, who is going to take my place ? Facts and truth is ugly and painful, but the corruption allowed to continue with no Audits is much worse. To date and 3 years later, not one person including Sarah Borton and all officials have challenged my facts. The only thing they have done is tried to silence, suppress, delete and edit my work. We all now know why !!!! Question is what is law enforcement going to do to help save our community from all these crooks, liars and thieves.
>
> Forencic Audits like Berkeyley SC must be done asap:
>
> 1 Jeff moss/ all accountants/ audit firm
> 2. Bill miles/ Ray deal / Ray
> Warco/ Bobby creech auditor
> 3.Steve riley and Hhi Town lawyers Gregg Alford / Brian hulbert
> 4 Marc Orlando / Lisa Sulka / Terry finger Bluffton Town
> 5. Gary Kubic/ Josh Gruber
> Town and county of Beaufort.
>
> All our local officials like Mark Sanford are in hiding and are scared to speak up. We need to force them all to respond at every public event they all attend. Huge crisis!!!! Thanks
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

On Aug 18, 2017, at 5:02 PM, jerry at the beach <gringoviejotwo@yahoo.com> wrote:

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Regarding the below;

Note, for this corrupted board, a forensic audit is only 100k and they have been paying 50k that allows theft, embezzlement and will not know how much until Jeff Moss and Bill Miles are forced to a forensic audit. These 5 people who voted against an Forensic audit should be ashamed, removed from office and not sure how they can look at anyone including their families and be proud of this.

I could not agree more. As I have said before,...**the cost of NOT insisting on a forensic audit is what troubles me.** 50K is peanuts in a quarter billion dollar budget.

~Jerry

On Friday, August 18, 2017, 3:56:05 PM EDT, CC Hoagland <skiphoagland@yahoo.com> wrote:

Jerry, as you already know, I seek out corruption and wrong doing in Beaufort county, no matter where it's going on. I let facts speak for themselves and cc and bc many, including all law enforcement agencies both state and federal and all local officials both honest and corrupted. I fear no one, no retaliation, loss of job or even friends. I do not pick or chose based on politics, friends, or friends of friends in our small local incestous community. My goal is to stop corruption and replace dishonest people with honest people to serve us all.

It's simple, Ms Borton does not receive advertising from the School Board. She picks and chooses who she will report on and in fact, told me in so many words on one of many private conversations I had with her as Publisher to Publisher, she had to be careful who she reported on, as not to lose ads or readership. She is an employee, not the owner of this paper and like many of us fears for her job and profits. This is not new and can be read online about other newspapers taking this position behind closed doors.

On top of this, I have now connected her husband Brett Borton to much of the corruption I am after, not connected to the School board and crook Jeff Moss, his hired audit firm in Charleston and this corrupted, incompetent Moss Majority Board. In fact, based not just on Berkeley county corruption for the school CFO and the chamber, other school board corruption you can read about online nationwide, including credit card misuse.

We just don't need a forensic audit, we need a detailed federal FBI IRS investigation of Moss, his lawyers, accountants and the audit firm he hired "Not Independent". The forensic audit of the Moss hired audit, just like the hired audit of the Bill Miles chamber will prove to be corrupted and I predict prison for many, once this is done. Moss lied once he will lie twice. Town councils and this School board who says things like they do to justify not doing a forensic audit, could not being any more ignorant or corrupted.

If they are discovered to be tied to Moss in any way other than just being ignorant, incompetent or naive once this deep investigation is accomplished, they like Moss and others, will join them in prison and perhaps share a cell with the Berkeley school CFO.

Now back to Sarah Borton. I warned her, in private emails, to start doing more fair coverage based on facts on Bill Miles, the chamber, Town of Hilton Head, the Atax committee, the LCGOA(low country golf owners association) and USCB and Jane Upshaw past Chancellor, and she would not. (Just like Tenet and the hospital.) Fact is Brett Borton is tied and friends with all this. USCB, Bill Miles, Sea Pines Cary Corbitt, Steve Birdwell President of Sea Pines, Brad Marra Palmetto Dunes, Chamber board, Atax committee, David Tigges McNair law firm, Paula Bethea past lottery commissioner, and more. It's a deep

incestuos tangled web of corruption, that I decided to stop after 40 yrs of living on this island, I simply had enough.

Brett Borton was head of the Lcgoa and tied to Bill Miles and much more. Then when the heat started by me, he was hired by Chamber board member Jane Upshaw, husband Tom Upshaw, past president of Palmetto Electric and Chairman of the Chamber with Bill Miles, who refused my membership in an attack to put me out of business, just as they did the Lcgoa crooks put Marc Freys Golfers Guide out of business. I have all the facts for the FBI, Sled and Attorney General.
Too much to keep adding as a reply to your email.

Yes the Packet article on the School board is good, as was their past coverage that never gave credit to BWD and myself on the ethics commission ruling on Moss. Sarah and her husband, like many, just got sucked into the local community and took jobs with crooks that inturn could silence coverage on local friends. Again, an investigation and questions for Sarah and her husband will prove to be shocking. However, you will not read this in Packet until Sarah Borton is replaced with a neutral publisher. Sarah Borton is a member of the chamber and allowed her editor David Lauderdale to be used as a puppet to receive citizen of the year by Bill Miles, why?

Folks, we live in a spotlight movie 2 community, not about the Catholic Church, its about a corrupt school board, Chamber, local newspaper, Town councils, Town managers like crook Steve Riley. There is so much incestous tie in's, that it's hard to even believe as not some wild conspiracy theory. Fact is, I have the facts to discount the conspiracy theory.
Thanks

011-54-9-11-
5942-3202

On Jul 27, 2017, at
6:37 PM, CC
Hoagland
<skiphoagland@yahoo.com>
wrote:

> Cookie
> cutter
> audits
> are not
> meant
> to catch
> crimes.
> This is
> why our
> state is
> in
> trouble.
> Never
> in the
> 100
> year
> history
> has any
> School
> districts,
> chambers
> and
> towns

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

been forensically audited. Berkeley county SC first one on Sc. Those in other states that have refused forencic audits and then forced or investigated by the FBI IRS investigations have mostly resulted in prison. Here is your answer. Palm beach type audits

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland US cell 843-384-7260 Buenos Aires , Argentina 011-54-9-11-5942-3202

On Jul 27, 2017, at 5:59

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

PM,
fran bisi
<eyelandart@yahoo.com>
wrote:

I
think
what
you
have
attached
isn't
referring
to
a
forensic
audit,
but
a
CAFR
that
Moss
was
referring
to...AKA
Cookie
Cutter.

fran

On
Thursday,
July
27,
2017
5:22
PM,
"Caporale,
Rick"
<rcaporale@bcgov.net>
wrote:

Fran:

When
we
think
or
talk
about
audits,
we
should
all
recall
the
role
(complicity?)
of
auditing
firms

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

in the financial meltdown. A few of whom are no longer in business. Have we forgotten so soon? The attached document ("Are Audits Worthless") is worth a quick read.

RC

From: fran bisi [eyelandart@yahoo.com]
Sent: Thursday, July 27, 2017 4:19 PM
To: Orischak, Josephine A; REBECCA BASS
Cc: Jim Bequette; Marilyn Bullard; jerry

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

at
the
beach;
Tony
Cambria;
mkeel@sled.sc.gov;
Meyerhofer,
Kelly;
Gwozdz,
Christina
S;
Flewelling,
Brian;
Kinton,
Geraldine
C;
shannonerickson@schouse.org;
johncrangle2@gmail.com;
Stewart,
Jerry;
Dawson,
Gerald;
Rick
Brundrett;
skiphoagland@yahoo.com;
michaelrivers@schouse.gov;
Campbell,
Earl;
ami@ethics.sc.gov;
jdpc@hargray.com;
joe_mckeown@scott.senate.gov;
tom@senatortomdavis.com;
Dunkle,
Joseph
R;
taylor@harrisonfirm.com;
Liz
Farrell;
Staton,
Jennifer
A;
pgrant@sled.sc.gov;
tmbdab@aol.com;
marksanford99@gmail.com;
Fobes,
Steve;
Joseph
Iaco;
Caporale,
Rick;
Rodman,
Stewart;
awilson@scag.gov;
Spiker149@hargray.com;
wnewton@jsplaw.net;
cnrgbr@hargray.com;
deann.komanecky@blufftontoday.
com;
zoomru@yahoo.com;

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Gregory,
Cynthia
W;
John
Dowling;
rgregory@sled.sc.gov;
shamm@ethics.sc.gov;
jbagnall@ethics.sc.gov;
Cordray,
Mary
M;
jeffbradley@schouse.gov;
dwilliams@sled.sc.gov;
mburchstead@ethics.sc.gov;
usn1066@gmail.com;
lgibson@scag.gov;
Crosby,
Tonya
V;
aldenbauer706@gmail.com;
Cushingberry,
Robyn
L;
contact@beaufortwatchdog.org;
Payne,
Wilbur
M;
Auditor;
Striebinger,
David
R;
Covert,
Michael
Subject:
Re:
Moss
Letter
to
editor
July
26,2017
@5:13

If
I'm
correct
they
"selected
40
transactions"
for
Fiscal
Year
2016.
They
were
"examined
for
compliance

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

with
the
District's
procurement
policy
and
not
exceptions
were
noted."
Whatever
that
means,
I'm
not
impressed.
That's
less
than
a
day's
worth
of
transactions.

Example:
on
Jan
5th
and
6th
of
2016
there
were
37
transactions
and
that's
not
counting
those
under
$100.

Is
this
what
he
calls
an
audit?

fran

On
Thursday,
July

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

27, 2017 1:53 PM, "Orischak, Josephine A" <Josephine.Orischak@beaufort.k12.sc.us> wrote:

All,

FYI: Here is a link to the BCSD website for Procurement Audits performed from 2013 to the present. Open the 'Other Financial Reports' folder to view.

http://beaufortschools.net/cms/one.aspx?portalId=170925&pageId=296554

JoAnn Orischak Beaufort County Board of Education District 11 Hilton Head Island C.

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

(843)
338-
1737

Sent
from
my
iPad

On
Jul
27,
2017,
at
9:36
AM,
"REBECCA
BASS"
<muttleycrew2008@gmail.com<
mailto:muttleycrew2008@gmail.
com>>
wrote:

In
his
letter,
Moss
does
say
"they
are
reviewed
each
year
by
a
pair
of
separate
independent
audits".
We
should
request
copies
of
these
audits
and
ask
who
conducted
them.

Rebecca

On
Thu,
Jul

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

27,
2017
at
9:25
AM,
Jim
Bequette
<jwbterp@aol.com<mailto:jwbterp@aol.com>>
wrote:

I
am
attaching
a
letter
written
by
the
Superintendent
which
was
printed
in
last
night's
internet
edition
of
the
Packet/Gazette.
Moss
asserts
that
letter
writers
have
asserted
that
"Beaufort
County
School
District
employees
have
misused
tax
dollars"
using
district
credit
cards.
He
then
states
"nothing
could
be

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

further from the truth".

Why does he not promote having a forensic audit to assure us taxpayers that his statement is factual? Why aren't we given all the facts on the admitted 47 fraudulent charges on those card?. Who did the two separate independent "reviews" of P-card that he cites in this letter? Note he doesn't say

audits. I will submit an FOIA request for the "reviews".

I read the county government spends about $1 million a year on credit cards while the School District is up about $25 million. The county budget is smaller than 1/2 of the school's.

Many, many charges on those P-cards as reported by Fran Bisi look very

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

questionable. Superintendent Moss can only quiet down the public uproar by immediately having the Board approve a forensic audit. How can you take his statements as fact after he was already found in two ethics violations?

Last I would like to commend Fran Bisi for her great work in exposing what could be a monumental problem. However if

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Moss
and
the
Board
do
not
approve
a
forensic
audit,
the
citizens
will
never
know
the
truth
or
trust
them.

Jim
Bequette
Retired
CPA
in
Md,
WV,
and
SC

-
-
Rebecca
W.
Bass
Broker
in
Charge
SeaBass
Properties
Real
Estate
Licensed
in
South
Carolina
and
Georgia
843-
263-
3772

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

<attachment 1>

<attachment 2>

<attachment 3>

<attachment 4>

<attachment 5>

<attachment 6>

<attachment 7>

<attachment 8>

<attachment 9>

<attachment 10>

<attachment 11>

<attachment 12>

<attachment 13>

<attachment 14>

<attachment 15>

<attachment 16>

<attachment 17>

<attachment 18>

<attachment 19>

<attachment 20>

<attachment 21>

<attachment 22>

<attachment 23>

<attachment 24>

<attachment 25>

<attachment 26>

<attachment 27>

<attachment 28>

<attachment 29>

<attachment 30>

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

<attachment 31>

<attachment 32>

<attachment 33>

<attachment 34>

<attachment 35>

<attachment 36>

<attachment 37>

<attachment 38>

<attachment 39>

<attachment 40>

<attachment 41>

<attachment 42>

<attachment 43>

<attachment 44>

<attachment 45>

<attachment 46>

<attachment 47>

<attachment 48>

<attachment 49>

<attachment 50>

<attachment 51>

<attachment 52>

<attachment 53>

<attachment 54>

<attachment 55>

<attachment 56>

<attachment 57>

<attachment 58>

<attachment 59>

<attachment 60>

<attachment 61>

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

<attachment 62>

<attachment 63>

<attachment 64>

<attachment 65>

<attachment 66>

<attachment 67>

<attachment 68>

<attachment 69>

<attachment 70>

<attachment 71>

<attachment 72>

<attachment 73>

<attachment 74>

<attachment 75>

<attachment 76>

<attachment 77>

<attachment 78>

<attachment 79>

<attachment 80>

<attachment 81>

<attachment 82>

<attachment 83>

<attachment 84>

<attachment 85>

<attachment 86>

<attachment 87>

<attachment 88>

<attachment 89>

<attachment 90>

<attachment 91>

<attachment 92>

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

<attachment 93>

<attachment 94>

<attachment 95>

<attachment 96>

<attachment 97>

<attachment 98>

<attachment 99>

<attachment 100>

<attachment 101>

<attachment 102>

<attachment 103>

<attachment 104>

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

From: **CC Hoagland** skiphoagland@yahoo.com
Subject: Fwd: John McCann wants to change the powers of mayor David Bennett/ Island Packet article attached
Date: December 27, 2017 at 10:59 PM America/New_York
To: JohnM@hiltonheadislandsc.gov, Tom Lennox toml@hiltonheadislandsc.gov, WilliamH@hiltonheadislandsc.gov, KimL@hiltonheadislandsc.gov, stever@hiltonheadislandsc.gov, gregg@alfordlawsc.com, brianh@hiltonheadislandsc.gov, gregd@hiltonheadislandsc.gov
Cc: davidb@hiltonheadislandsc.gov, David Ames amesco@earthlink.net, MarcG@hiltonheadislandsc.gov, Will Folks will.folks@gmail.com, david@myrtlebeachsc.com, Steve Birdwell sbirdwell@seapines.com, John Munro JMunro@seapines.com

I will have a strong response forthcoming for lying, corrupted, crooked and incompetent John McCann. Running for next Mayor is an embarrassment.
My next speech will be 100% about Mr McCann and the Steve Riley Hilton Head Town council majority.

It's imperative we get FBI and Sled involved in a full investigation and forensic audit of this Town and all the filth part of it.
The recent:
1. $150k to the Chamber for Irma
2. 27k to McNair Law firm in secret
3.Town joining of the private chamber corporation with tax funds for top charged member dues. Worse they all used our tax funds to attend the Alcohol spiked Koolade Chamber Ball to win and dine in tax payers dime. This of course buys their silence to allow Bill miles and his cronies, co conspirators and accomplishes to keep abusing, stealing, scamming, scheming, committing fraud and unconstitutionally misusing our tax funds in secret.
4.The ongoing unconstitutional misuse of public Atax funds
5.Atax committee conflicts and some tied to chamber and Atax recipients, was told Gregg Deloach and Riley chose the Atax members.
6.340k / 100k apps that cost 30k a scam.
7. 4 million 600 per sqft attempted Welcome center scam
8.1 m to Bill Miles on the sale of this town property.
9.McNair Law firm David Tigges controlled the corrupted chamber contract. Add Paula Bethea, Jane and Tom Upshaw involvement.
10. No independent audits
11.No Dmo procurement
12.No foia
13. No non profit corporation act
14. First Amendment violations
15.Town Council total illegal misuse of tax funds to sue a citizen
16.Passing a resolution to sue citizens
17.Secret meetings, secret use of personal emails for Town business
18.Town council allowing unfair competitive practices by recipients use of Atax funds
19. allowing Irs Ubit Violations by Atax recipients
20. allowing private chamber Atax recipient to take our tax funds to Canada, a complete abuse.
21. Town council allowing Unfair competitive practices to local tax paying businesses with Atax funds.
22. Worse part for me is allowing use of the Atax funds to be used by Bill Miles to own the overcharged 100k app and website to exclude the entire community and profit his private pocket to pay himself $400k salary, 25 employees some over $150k and average $87,500 each. To fully confirm misuse, embezzlement, fraud what else Bill miles steals we will not know fully and how much, until FBI investigation and forensic audit is completed, like just happen to the Berkeley SC Chamber.

Again, it's simple math 1500 members at $400 per membership equals $600k.
Add in Bill Miles' $400k, 25 employees some over $150k, average $87,500, perks, travel, bonuses, entertainment, health benefits, office, utilities, secret money to Canada, and what we don't know

total 3m plus. So do the math, numbers don't lie people do. It's simple - all this paid with not just members dues, but with commingling Atax funds, selling of advertising with IRS Ubit 501-c6 non profit tax avoidance and violations. We have already proven different forms of Chamber fraud, like Chamber of the year.

This Town Council is allowing unconstitutional misuse of tax funds and we are working on another lawsuit against the Town of Hilton Head for unconstitutional misuse of tax funds by its hired city Dmo. Also allowing this chamber to hire the Dmo Atax fund audit, not the Town. The chamber hired audit does not include full audit disclosure.

We have more than enough to warrant a forensic audit and FBI investigation to confirm all this and much more like the arrest made in Berkeley SC.

John McCann, Tom Lennox, Bill Harkins, Kim Likins are all perfectly aware of what's going on and they all intentionally lied and approved overcharges to allow this chamber to escape. They all must be held fully accountable, liable and investigated.

This article on lying corrupted John McCann wanting to strip Mayor Bennett of his powers is nothing more than an attempt by puppet McCann to put more power in the hands of lying corrupted crooked Steve Riley and our crooked corrupted Town lawyers Gregg Alford and Brian Hulbert that should be sued for malpractice.

http://www.islandpacket.com/news/politics-government/article183461416.html

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Gmail by Google

Gregg Alford <gregg@alfordlawsc.com>

Fwd: Supreme Court Case Hilton Head Town Council will be sued again for their allowing ongoing theft and unconstitutional misuse of our tax monies.

CC Hoagland <skiphoagland@yahoo.com> Sat, Dec 23, 2017 at 1:28 PM
To: stever@hiltonheadislandsc.gov, davidb@hiltonheadislandsc.gov, David Ames <amesco@earthlink.net>, Tom Lennox <toml@hiltonheadislandsc.gov>, JohnM@hiltonheadislandsc.gov, WilliamH@hiltonheadislandsc.gov, MarcG@hiltonheadislandsc.gov, KimL@hiltonheadislandsc.gov, brianh@hiltonheadislandsc.gov, gregg@alfordlawsc.com
Cc: "Thenerve.org Rick" <rbrundrett@islandpacket.com>, david@myrtlebeachsc.com, Will Folks <will.folks@gmail.com>

Mr Riley you and your crooked lying council majority will have another lawsuit filed against you and this highly corrupted incompetent Town council for once again allowing theft and unconstitutional misuse of our public funds. The SC law is clear, you can't keep issuing tens of millions of Atax funds and even our general tax monies for private use and worse allowing private profit in violations or state laws and Irs tax codes. Public Atax funds and all tax monies can only be used and issued for the public good, use and benefit. Many recipients on the Atax list are private, and worse no oversight. The Dmo listed on your Atax list cleverly hides and you put down as Town of Hilton head for the 1.6m in Atax funds versus City Dmo currently the Chamber. Where was the procurement this year you were sued for ?

You keep refusing to respect the professionals who address you, and this entire council has a false sense of knowledge and superiority sitting on this Dias. You all keep forgetting you are Public servants who work for the tax payers. You are supposed to spend and protect tax monies like you own, not steal tax monies and allow others to as well. You also keep listening to incompetent Town Lawyers Gregg Alford and Brian Hulbert who keep getting you in trouble and sued. They should all be fired and sued for malpractice, Steve riley terminated and all investigated by the FBI for criminal theft of our tax monies. In fact we need an FBI investigation of this entire town and council. I am confident this will happen at some point in time.

Subject: Supreme Court Case

http://www.sccourts.org/opinions/HTMLFiles/SC/27738.pdf

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Gmail by Google

Gregg Alford <gregg@alfordlawsc.com>

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702637

Fwd: Another lawsuit just filed against the secret corrupt Hilton head Chamber for refusing financials to its own members——McAvoy v. Hilton Head Island - Bluffton Chamber of Commerce, Case No. 2017-CP-07-01766

Skip Hoagland <shoagland@me.com> Sat, Dec 23, 2017 at 12:19 PM
To: JohnM@hiltonheadislandsc.gov, bill miles <bmiles@hiltonheadisland.org>, Sarah Borton Sarah Borton <sgillis@islandpacket.com>, Tom Lennox <toml@hiltonheadislandsc.gov>, WilliamH@hiltonheadislandsc.gov, david tigges <dtigges@mcnair.net>, jwiendl@sonesta.com, Ryan McAvoy <mcavoylegend@gmail.com>, rdeal@hiltonheadisland.org, rwarco@websterrogers.com, bcreech@websterrogers.com, cclark@hiltonheadisland.org
Cc: fran bisi <eyelandart@yahoo.com>, lsulka@townofbluffton.com, KimL@hiltonheadislandsc.gov, JohnM@hiltonheadislandsc.gov, stever@hiltonheadislandsc.gov, david tigges <dtigges@mcnair.net>, bill miles <bmiles@hiltonheadisland.org>, Steve Birdwell <sbirdwell@seapines.com>, jwiendl@sonesta.com, sarah borton <sborton@islandpacket.com>, Cary Corbitt <CCorbitt@seapines.com>, Brad Marra <bmarra@palmettodunes.com>, Duane Parrish <dparrish@scprt.com>, eriggs949@gmail.com, edukes@lcre.com, wegmannj@beaufortlaw.com, Blakely Williams <blakelyw@beaufortsc.org>, Robb@beaufortsc.org, susan@surfcityusa.com, rdeal@hiltonheadisland.org, rwarco@websterrogers.com, bcreech@websterrogers.com, paula@phbethea.com, ted.pitts@scchamber.net, b_fleming@hargray.com, john vann <jvann@bbandt.com>, patricia@facesdayspa.com, bortonb@uscb.edu, jupshaw@uscb.edu, Jeffrey C Moss <Jeffrey.Moss@beaufort.k12.sc.us>, Drew H Davis <drew.davis@beaufort.k12.sc.us>, gregg@alfordlawsc.com, brianh@hiltonheadislandsc.gov, jgruber@bcgov.net, gkubic@bcgov.net, gregd@hiltonheadislandsc.gov, "Tonya V. Crosby" <tonya.crosby@beaufort.k12.sc.us>, Geri Kinton <geri.kinton@beaufort.k12.sc.us>, Orischak Josephine A <josephine.orischak@beaufort.k12.sc.us>, david striebinger <david.striebinger@beaufort.k12.sc.us>, Christina Gwozdz <christina.gwozdz@beaufort.k12.sc.us>, Earl Campbell <earl.campbell@beaufort.k12.sc.us>, Joseph Dunkle <joseph.dunkle@beaufort.k12.sc.us>, Mary Cordray <mary.cordray@beaufort.k12.sc.us>, Wilbur Payne <bill.payne@beaufort.k12.sc.us>, "Jennifer A. Staton" <jennifer.staton@beaufort.k12.sc.us>, Kelly Meyerhofer <kmeyerhofer@islandpacket.com>, Jerry Stewart <jstewart@bcgov.net>, Covert Michael <mcovert@bcgov.net>, rick caporale <rcaporale@bcgov.net>, "s. rodman" <srodman@bcgov.net>, "s. fobes" <sfobes@bcgov.net>, "g. dawson" <gdawson@bcgov.net>, brian flewelling <brianf@bcgov.net>, Frank Schumpert <fschumpert@ethics.sc.gov>, Steven Hamm <shamm@ethics.sc.gov>, John Dowling <dowlingjohn287@gmail.com>, Jerry at the Beach <gringoviejotwo@yahoo.com>, Windrunnerstables Info <info@windrunnerstables.com>, Staff <contact@beaufortwatchdog.org>, Jim Bequette <jwbterp@aol.com>, John Crangle <johncrangle2@gmail.com>, "Thenerve.org Rick" <rbrundrett@islandpacket.com>, Don Brashears <tmbdab@aol.com>, Giles Hall <usn1066@gmail.com>, Tom Davis <tom@senatortomdavis.com>, Jiaco <jiaco@bellsouth.net>, Sled Paul Grant Sled Paul Grant <mkeel@sled.sc.gov>, Liz Farrell <efarrell@islandpacket.com>, Attorney General Alan Wilson Attorney General Allan Wilson <awilson@scag.gov>, Stern Allan <spiker149@hargray.com>, Alden Bauer <aldenbauer706@gmail.com>, Auditor <auditor@bcgov.net>, Joan Deery <jdpc@hargray.com>, Mark Sanford <marksanford99@gmail.com>, Ami Franklin <ami@ethics.sc.gov>, Tim Scott <joe_mckeown@scott.senate.gov>, Michael Rivers <michaelrivers@schouse.gov>, Jeff Bradley <jeffbradley@schouse.gov>, Michael Burchstead <mburchstead@ethics.sc.gov>, Phillip Branton <zoomru@yahoo.com>, Deann Komanecky <deann.komanecky@blufftontoday.com>, Richard Eckstrom <reckstrom@cg.sc.gov>, Richard Gregory <rgregory@sled.sc.gov>, Jimmy Bagnall <jbagnall@ethics.sc.gov>, David Lauderdale <dlauderdale@islandpacket.com>, Liz Farrell <lfarrell@islandpacket.com>, "Thenerve.org Rick" <rick.brundrett@gmail.com>, Will Folks <will.folks@gmail.com>, davidb@hiltonheadislandsc.gov, Trish Heichel <trilar3@aol.com>, Barrett Brewer <BBrewer@clawsonandstaubes.com>, srawls@clawsonandstaubes.com, tvaux@bcgov.net, "William G. Bill Herbkersman" <schsdistrict118@aol.com>, tompeeples@aol.com, Weston Newton <wnewton@jsplaw.net>, tdavis@harveyandbattey.com, John Keener <john@charlestoncrabhouse.com>, psommerville@bcgov.net, Lee Edwards <leeedwards@thegreeneryinc.com>, Lee Bright <Lee@brightagencyinc.com>, drew laughlin <drew@laughlinandbowen.com>, Michael Gottdenker <michael.gottdenker@htc.hargray.com>, Cynthia Bensch <bensch@hargray.com>, tmoss@islandpacket.com, Gina Smith <gsmith@islandpacket.com>, "Gillis, Sandy" <sgillis@islandpacket.com>, David Lauderdale <letters@islandpacket.com>, Brian Tolley <btolley@islandpacket.com>, chris hendricks <chendricks@mcclatchy.com>, Alexandra Villoch <avilloch@miamiherald.com>, "Fitzpatrick, David" <dfitzpatrick@mcclatchyinteractive.com>, chris@hickspub.com, david@myrtlebeachsc.com, David Ames <amesco@earthlink.net>

Lawsuit attached——Boot corrupted lying Crook John McCann.
This Town council and the Island Packet newspaper are both Chamber members and choose to do nothing for transparency. This is a result of our 3 crooked corrupted council members McCann, Harkins and Lennox all Lying and the rest of our council weak puppets of local corruption and this Chamber. They all were silenced by Steve riley making them members with our tax monies. Another theft and misuse of our tax money.

Shame on all of you this Christmas season.

Thanks for citizens like Ryan McAvoy, who are willing to stand up and do councils job to force transparency. What is wrong with you people to keep allowing theft by Bill Miles on tens of millions of our tax monies. You are also allowing IRS Ubit violations and many other crimes connected. Think about what you each were hired and elected to do as you spend time with your family this

holiday season. This council facilitating and allowing secrecy, non transparency and accountability with our tax funds and chamber members dues must end. No one has seen an independent audit of anyone's books who control, issue or receive our millions in tax monies. We desperately need FBI,Irs,Sled involvement.

Town council members John McCann, Bill Harkins and Tom Lennox all lied when they said they saw the chamber books at the chamber offices with corrupt lying Bill Miles. Imagine they all are accomplices and Co conspirators to help Bill miles to keep hiding theft of chamber member dues and Atax funds, Bill Miles and his crook puppet Chairman Jay Weindl of the Sonesta Resort and David Tigges Chairman of McNair Law firm are now trying to say Ryan McAvoy is not a member, when he has proof he is. Only one reason to keep trying to hide the books, they have lots to hide and worry about. Once this accounting is seen, forensically audited and investigated by the FBI,
everyone connected to this chamber tax scam, fraud and theft by Bill miles is going to be arrested and prosecuted. The recent Berkeley County SC FBI raid on the Chamber and School Cfo 386k theft is just the tip of the iceberg.

Sara Borton - was she fired or retired? You don't retire at 55 yrs old . Makes no difference, good news she is gone. She harmed this island for 25 yrs with her ties to local corruption, big advertisers, and censorship of important news on corruption. Sara Bortons', husband Brett Borton, was tied to the massive corruption of the LCGOA tied to Bill Miles, Cary Corbit, Brad Marra and others. They all schemed on putting a local publisher out of business. Let's hope the Island Packet will replace Sara Borton with a publisher that does not fear, and can not be controlled by local corrupt power and big advertisers. We need wide open local reporting, our community deserves this.

The local corruption has many tentacles, I have great knowledge of a lot, after watching all this corruption by many crooks for 40 yrs.

Remember a 50k cash reward is being offered for any info we don't already have, that leads to the arrest, conviction and imprisonment of any local Beaufort County official or Chamber employee.

Merry Christmas and Happy non corrupt New Year.

Attachment: Filed Summons & Complaint.pdf

Attachment: Filed Exhibits.pdf

Attachment: Request to Produce Computers for Inspection Copying.pdf

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Sep 2, 2017, at 11:45 AM, Skip Hoagland <shoagland@me.com> wrote:

> Anyone on this email threatened with a defamation lawsuit by Moss or others in an attempt to try and scare and silence you, please let me know.
>
> I also highly suggest if you decide to aggressively fight corruption like me, check your homeowners insurance policy for slander and defamation coverage. If you don't have it, add it asap, its very inexpensive and mine covers me for 3.5m per case.
> This gives me the same financial ability to fight a thief like Kim Likins and her accomplices /co conspirators on Hilton Head Town council who used unlimited tax monies, 200k to date, to sue me for her "private sector"non

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

related Town lawsuit. Note all checks made out to her lawyers were by crook / thief Steve Riley. It was me who discovered this secret theft with a Foia, that they actually confessed to. This shows you not only how incompetent they are, but how crooked. In their crazy lunatic corrupt minds, they actually thought this was ok and legal. Imagine using tax payers money to sue a citizen, passing a illegal town resolution to sue citizens who make speeches under the First Amendment , and then trying to prevent my free speech as a citizen because I lived in Windmill Harbor, unincorporated part of Hilton Head. How in the hell did we end up with so many crooked Baffons in charge and control of our town. We need to elect a full time Mayor in full power control to hire and fire, order audits, pay him 200-250k per year, not a part time Mayor at 30k. This way we can hold one person accountable, versus having to hold 7 responsible.

Fran, the local crooks and liars, like Jeff Moss , who I have addressed this email to, and specifically Part Time Mayor / Full Time Real estate Agent Lisa Sulka, and Part Time Kim Likins, both filed defamation lawsuits against me, claiming mental suffering from my exposure on their actions. So they defamed themselves, not me, I am just the messenger.

This is a desperate attempt by both of them to stop any critic from exposing them and their abuse of power, corruption and lies. The trial dates will be announced. I especially want as many people as possible to show up for the Kim Likins frivolous 200k tax payer paid spectacle.

Let's see if a jury will find Skip Hoagland guilty who fights for the Jury and all tax payers to expose and force transparency and award Ms likins and her thieving lawyers 3.5 m so they can buy a new mercedez funded by tax monies. Will be very interesting.

What these crooks don't understand is regardless of the outcome of any lawsuits, my plan is to carry this forward, send more emails, make more public speeches about Likins and Sulka the following day, addressing them individually at Town hill on what they did, and filing more lawsuits as need be. They can keep filing as many defamation lawsuits as they wish for next 20yrs, or death due us part. The question for crooks is how do they and the legal system stop a person like me from exposing corruption who has unlimited insurance funds at his disposal? I don't think they planned for this! They also did not plan for being caught stealing 200k in tax monies.

All crooks and their crooked lawyers are not dealing with someone they are used to dealing with. Plus I am a Florida resident and they will need to come to Florida and deal with me here versus corrupt, incestuos, secret, criminal, backwards SC in the future. I highly suggest the crooked lawyers find a good lawyer in Florida or get licensed there.

Lunatics Lisa Sulka and lawyer Terry Finger, even went as far to put up rules on how you could speak on a projector, on what you could say or not say. Imagine the mental state of this woman Sulka, and her lawyer removing a citizen making a professional civil speech with police from Bluffton Town hall, for simply exposing her lies and crimes? She told newspaper reporters, that the police removed me on their own free will, tossing her own police under the bus, when in fact the police report says she ordered the removal.
Imagine, now she says her defamation lawsuit is for mental suffering from the abuse I exposed on her. Again like her buddy Likins defamed herself, not me. She needs to be booted as Mayor as unfit, needs to be investigated by the FBI, as well as Marc Orlando Town manager, Terry Finger lawyer, and all need to be forensically audited, along with crook liar Jeff Moss, Bill Miles, Steve Riley and Gary Kubic and anyone else suspected of wrong doing, who controls all our tax funds.

I am counter suing for 10m in federal court against all Hilton Head council members for this illegal 200k lawsuit filed by Kim Likins. I now understand another tax payer will join my fight and file a separate lawsuit against the Town for in behalf of all tax payers for this 200k tax theft by Kim likins, Gregg Alford Town lawyer and Town manager Steve Riley.

Again FBI and forensic audits are going to end all this eventually, and until that day, the games will continue and the crooks will become even more tangled in their web of incestous corruption and attempts to cover up lies and theft. The end is near for all of them.

Now we have crook / liar buffoon John McCann announcing he will run for Mayor, who is also a flunky puppet for Bill Miles and Steve Riley to assist in robbing us all, he lied saying her saw the chamber accounting, and at the chamber public hearing made a fool
of himself, saying he made up his mind to vote in favor of the chamber contract night before. Now this buffoon announces over a year early that he is running for Mayor. What the hell is this all about?? Who will try and become Mayor next, Lying Likins? Stooge Riley? This man Mcaan has to be totally out of his mind. I guess as a retired part time crook, he has nothing else to do but add another toxic cloud over Hilton Head, or stay at home driving his wife crazy. Imagine we elect this lying fool, and elected everyone else on Hilton Head town council, they all have violated their campaign promises, fully knowing they had no intention of doing so. This is called fraud. So yes, add this to the list, they are all frauds.

What we need is change of our political system asap, get young honest full time Mayors elected with full power to hire, fire and launch forensic audits without majority votes of corrupted councils or boards, or FBI raids. This way if

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

our full time Mayor does not act and honor his campaign promises, and commits fraud like our current elected officials are doing, again we have just one person to hold accountable and can try again 4 yrs later.

We need to also elect an honest school board Chairman. I again think this needs to be a full time position. Nothing will ever work well with a part time leader.
We need to empower the county auditor or someone trusted to hire the annual audits, under procurement laws, not the school administration crook Moss. This audit would be fully available under foia to all of us to further verify Reagan principal.

We need an honest Chamber chairman that will have the power to hire the audit of the chamber, not crook employee Bill Miles hired audit. Chairman and board duly elected, not appointed that will have total control over employees. A chamber to act like a real chamber and a separated Cvb, both fully comply to foia laws if any public monies are received, and finally make this audit available to all Chamber members under the SC non profit corporation act laws. The Town must comply to audits of the city Dmo, bid out under procurement laws, oversight with SC prt, Sc Terc. Make sure all funds are used properly under the specific job of a Dmo. Our current Hilton head Chamber is a fraud, commingled hybrid committing theft and misuse, violating Irs Ubit, fair trade business practices and scamming our entire community. Puppet Jay Weidl at Sonesta Resort, David Tigges McNair law firm, Tom and Jane Upshaw, Paula Bethea, Ray deal , Ray Warco and Bobby Creech all need to be FBI IRS investigated and deposed.

I welcome as many of these crooks to sue me for defamation as possible, this will allow me to get access to more discovery and depositions. My goal and sights are getting full access to all the financials one way or the other, until the FBI IRS kicks down their doors like Berkeley county SC and Palm Beach. Again here is the audit that will be forced on Bill miles and his cronies, that will put them all in prison. http://www.mypalmbeachclerk.com/uploadedFiles/Public_Funds/conv_ctr_audit_report.pdf

David Tigges, crook lawyer and Chairman of McNair law firm, now caught secretly representing Steve Riley, is the lawyer for Bill Miles, sits on SC chamber board with flunky liar Ted Pitts, and imagine fighting my transparency Foia lawsuit in the Supreme Court to allow him and thief Bill Miles, to remain secret with all our tax monies and members dues, to keep stealing. My goal for crook Tigges is to not just watch him go to prison with Bill Miles, accountants, Paula Bethea and others, but be disbarred. He does not qualify for a low level job at Wal-mart and even at that you would need the cameras on.

I can assure you once the forensic audits, FBI investigations are done, the least of their problems will be me, and others who are speaking up on all this theft, misuse, fraud, embezzlement and misappropriation.

I can assure you my words will not land me in prison, nor enrich their crooked pockets, their actions will land them in prison. I fight to win, not lose, and will defend myself in ways the crooks have no chance of defeating. The lawyers were not trained in law school to deal with all these issues. They are all over their heads.

Further, even SC judges must be challenged on any attempt to issue gag orders that violate the federal laws under our 1st Amendment rights under the constitution of the United States of America. What we are witnessing on TV is not civilized free speech.

I dare anyone on this email to publicly debate me, deny or challenge me by email back to this entire list of recipients. Anyone who can prove me wrong on all this, my family will donate 1m to Beaufort county as an apology in my behalf, and I will move to Florida.

Now let's see if the press will cover this story of the importance of Forensic Audits. Thanks

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 28, 2017, at 9:08 AM, fran bisi <eyelandart@yahoo.com> wrote:

> Ms. Crosby, (Ms. Staton and any interested Board members):
> When I started to take a look at the Beaufort County School District Transparency Reports at the beginning of this year, I addressed my questions to you, Ms. Crosby. You

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

never answered my emails and instead deferred to your boss, Superintendent J. Moss. He deflected, insulted and threatened me with defamation lawsuits. Now that the District has realized those tactics aren't going to work, and in fact, only made the controversy more intense, your Finance Dept. has decided to make changes. This timing is not just a coincidence. As a result of these stall tactics, the taxpayers not only do not trust Moss, but now lack trust in all financial matters of The District. As CFO, YOU have an obligation to respond.

I would like these items to be addressed:

1.) What is this charge?
6/9/2017 GCA SERVICES GROUP DISTRICT OFFICE* 4/22/17 CUSTODY-(CHECK) $ 733,661.18
Fund # 822 CINDERELLA FELLA BALL

2.) Why was former CFO Phyllis White allegedly paid an additional $60,000.00 after her retirement and at least $5,000/month since February 2017.

As an example, here is the most recent payment:

6/9/2017 PHYLLIS S. WHITE MAY 2017 CONSULTING AND TRAVEL REIMBURSEMENT $6302.50 100 GENERAL FUND

Does she have a new contract? Has there been Board approval? How long will these monthly payments continue? Moss stated at a recent Board meeting that she was responsible for the marked increase in P-Card purchases. Why didn't she suggest this policy before Moss came on board?

3.) What Fund was used to write the one check to pay almost $3M on June 22,2017:
6/22/2017 BANK OF AMERICA MAY P-CARD PAYMENTS-**(CHECK) $ 2,977,361.06 ASSOCIATED FUNDS**

J. Moss emphatically stated in his email to me dated April 12, 2017:
"The payment is NOT made from one source, but ONE check is written." so there is no doubt that one check is issued every month to pay B of A.
It is time for "associated funds" to stop being the notation next to the payment. Moss chose to alter all of the Transparency Reports for FY2017 by deleting the Fund name and Number for each B of A payment. When financial records published on a School District website are changed, a cover-up of some sort is suspected. It's all about perception. Every other check that is written each month shows the source of the money. It is up to you to clarify your Finance Department's reports to the public.

4.) Where were the bookkeepers when the following charges were made by principals as gifts which are not allowed?
TXN00190465 5/4/2017 SQ CHANTEL TAI 70795300-566000 $322.00 (massage)
TXN00190447 5/4/2017 SQ THE WELLNESS CO 70795300-566000 $330.40 (spa day)
TXN00192381 5/25/2017 SWAROVSKI 309 70895300-566000 $171.72 (bracelets)

You have stated publicly on various occasions that they (bookkeepers) are the first line of defense. You said that they receive intensive, continuous training. My understanding is that it is the bookkeeper's job to ward off fraud, waste and abuse of credit cards. They report directly to their principals. It appears that the bookkeepers were unable to say "no" to their bosses when both were fully aware of the P-Card policy which prohibits gifts. This is in direct conflict with what you have claimed to be true. One has to wonder how many of these inappropriate charges were made in the past. Why did it take a private citizen to uncover these abuses of your P-Card Policy? It appears that this has been going on for quite some time because employees felt that no one was watching. All of this adds to the lack of trust that the public has for the District. This is unfortunate since it is the students who suffer when teachers are told there is no money in the budget for classroom supplies, yet principals are handing out "gifts" at will.

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

5.) In June of 2018, **325** checks were written for "Employee Reimbursement" totaling almost **$70,000.00**. This is more than teachers make in a year and all in a month when school was not in session. No employee name or detailed reason is given for the issuance of these checks. When a Board member receives reimbursement, their name is part of the line item. Why not do this for District employees? As long as these are legitimate payments, no employee should be opposed to having the details made public.

6.) You provided a list of the 50 or so B of A credit card holders at a recent Board meeting. Supt. J. Moss is the only employee in the District with a card in his name. His monthly credit limit is $20,000.00. What is the code that would appear next to any of the items that he charges?

And, Ms. Staton, please provide me with a record of all of his charges since he was hired in 2013. Public speculation about how J. Moss has been using his district credit card has ranged from illegal to immoral. The only way we can get to the truth is to disclose all of the charges on J. Moss' district credit card. Since that is in the public interest, I am requesting that any fees associated with these records be waived.

Thank you for your attention to these matters.

fran bisi

---

3 attachments

Filed Exhibits.pdf
2107K

Filed Summons & Complaint.pdf
290K

Request to Produce Computers for Inspection Copying.pdf
330K

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

From: **Skip Hoagland** shoagland@me.com
Subject: Skip Hoagland /Versus Beaufort Chamber Lawsuit update. Judge ruled in Beaufort Chamber favor to keep hiding financials from its members ?
Date: December 15, 2017 at 12:01 PM America/New_York
To: mcovert@bcgov.net, tvaux@bcgov.net, Rick Caporale rcaporale@bcgov.net, sturodman@aol.com, fran bisi eyelandart@yahoo com, mark@marksanford.com, Tim Scott joe_mckeown@scott.senate.gov, jwiendl@sonesta.com, tecklenburgj@charleston-sc.gov, jrhodes@cityofmyrtlebeach.com, psommerville@bcgov.net, davidb@hiltonheadislandsc.gov, jeffbradley@schouse.gov, Lucas High lhigh@islandpacket.com, Weston Newton wnewton@jsplaw.net, John Dowling dowlingjohn287@gmail.com, "Thenerve.org Rick" rbrundrett@islandpacket.com, Billy Keyserling billyk@islc.net, tdavis@harveyandbattey.com, david@myrtlebeachsc.com, Will Folks will.folks@gmail.com, Josephine.Orischak@beaufort.k12.sc.us, School Board bisi@roadrunner.com, earl.campbell@beaufort.k12.sc.us, joseph.dunkle@beaufort.k12.sc.us, "William G. Bill Herbkersman" schsdistrict118@aol.com, Alex Kinkaid akincaid@islandpacket.com, dpascoe@scsolicitor1.org, JohnM@hiltonheadislandsc.gov, Tom Lennox toml@hiltonheadislandsc.gov, WilliamH@hiltonheadislandsc.gov, Jerry Stewart jstewart@bcgov.net, Stephen Fastenau sfastenau@islandpacket.com, gringoviejotwo@yahoo.com
Cc: "Orischak, Josephine A" Josephine.Orischak@beaufort.k12.sc.us, REBECCA BASS muttleycrew2008@gmail.com, Jim Bequette jwbterp@aol.com, Marilyn Bullard bullardpiwko@aol.com, jerry at the beach gringoviejotwo@yahoo.com, Tony Cambria info@windrunnerstables.com, "mkeel@sled.sc.gov" mkeel@sled.sc.gov, "Meyerhofer, Kelly" kmeyerhofer@islandpacket.com, "Gwozdz, Christina S" Christina.Gwozdz@beaufort.k12.sc.us, "Flewelling, Brian" brianf@bcgov.net, "Kinton, Geraldine C" Geraldine.Kinton@beaufort.k12.sc.us, "shannonerickson@schouse.org" shannonerickson@schouse.org, "johncrangle2@gmail.com" johncrangle2@gmail.com, "Stewart, Jerry" jstewart@bcgov.net, "Dawson, Gerald" gdawson@bcgov.net, Rick Brundrett rbrundrett@islandpacket.com, "michaelrivers@schouse.gov" michaelrivers@schouse.gov, "Campbell, Earl" earl.campbell@beaufort.k12.sc.us, "ami@ethics.sc.gov" ami@ethics.sc.gov, "jdpc@hargray.com" jdpc@hargray.com, "tom@senatortomdavis.com" tom@senatortomdavis.com, "Dunkle, Joseph R" Joseph.Dunkle@beaufort.k12.sc.us, Liz Farrell efarrell@islandpacket.com, "Staton, Jennifer A" Jennifer.Staton@beaufort.k12.sc.us, "pgrant@sled.sc.gov" pgrant@sled.sc.gov, "tmbdab@aol.com" tmbdab@aol.com, "marksanford99@gmail.com" marksanford99@gmail.com, "Fobes, Steve" sfobes@bcgov.net, Joseph Iaco jiaco@bellsouth.net, "Rodman, Stewart" srodman@bcgov.net, "awilson@scag.gov" awilson@scag.gov, "Spiker149@hargray.com" Spiker149@hargray.com, "wnewton@jsplaw.net" wnewton@jsplaw.net, "cnrgbr@hargray.com" cnrgbr@hargray.com, "deann.komanecky@blufftontoday.com" deann.komanecky@blufftontoday.com, "zoomru@yahoo.com" zoomru@yahoo.com, "Gregory, Cynthia W" Cynthia.Gregory@beaufort.k12.sc.us, John Dowling dowlingjohn287@gmail.com, "rgregory@sled.sc.gov" rgregory@sled.sc.gov, "shamm@ethics.sc.gov" shamm@ethics.sc.gov, "jbagnall@ethics.sc.gov" jbagnall@ethics.sc.gov, "Cordray, Mary M" Mary.Cordray@beaufort.k12.sc.us, "jeffbradley@schouse.gov" jeffbradley@schouse.gov, "dwilliams@sled.sc.gov" dwilliams@sled.sc.gov, "mburchstead@ethics.sc.gov" mburchstead@ethics.sc.gov, "usn1066@gmail.com" usn1066@gmail.com, "lgibson@scag.gov" lgibson@scag.gov, "Crosby, Tonya V" Tonya.Crosby@beaufort.k12.sc.us, "aldenbauer706@gmail.com" aldenbauer706@gmail.com, "Cushingberry, Robyn L" Robyn.Cushingberry@beaufort.k12.sc.us, "contact@beaufortwatchdog.org" contact@beaufortwatchdog.org, "Payne, Wilbur M" Wilbur.Payne@beaufort.k12.sc.us, Auditor auditor@bcgov.net, "Striebinger, David R" David.Striebinger@beaufort.k12.sc.us, tdavis@harveyandbattey.com, "William G. Bill Herbkersman" schsdistrict118@aol.com, John Munro JMunro@seapines.com, Steve Birdwell sbirdwell@seapines.com, gerard mahieu gerardmahieu@aol.com, Marc Frey mfrey@freymedia.com, Sarah Borton Sarah Borton sgillis@islandpacket.com, Jay Bender jbender@brblegal.com, Dave Schwartz dave@scpolicycouncil.org, Jim Carpenter james.carpenter@carpenterlawfirm.net, Cynthia Bensch bensch@hargray.com, David Ames amesco@earthlink.net, Lee Bright Lee@brightagencyinc.com, Russ Keep hhlaw@hargray.com, joeborelli1@mac.com, Justin New Orleans Lawyer Justin New Orleans Lawyer jwinch@smithstag.com, Art Davis art@globallylocally.com, Jeremia Froyland jeremiafroyland@gmail.com, josh metnick josh@chicago.com, Fred Mercaldo fred@scottsdale.com, Austin Andrukaitis austinandrukaitis@gmail.com, John Keener john@charlestoncrabhouse.com, John Durst john@scrla.org, nancy watt wtghhi@aol.com, linda rew linda@hiltonhead.com, dan@media360.com, eric@laislamagazine.com, Ryan McAvoy mcavoylegend@gmail.com, Barrett Brewer BBrewer@clawsonandstaubes.com, gregg@alfordlawsc.com, Sarah Sanford sarahsanford@palmettobluffonline.com, sarah borton sborton@islandpacket.com, steve@stevenfooshe.com, dccarter2010@gmail.com, chip@limehouseprop.com, dpascoe@scsolicitor1.org

Beaufort Chamber can keep being secret, they won their motion to dismiss. I need a current member or someone willing to join the Beaufort Chamber, to file another lawsuit. We will pay for all, it's a very inexpensive lawsuit and just ask for judge ruling that a member has rights to access the financials under the SC non profit corporation act laws of SC. Their claim was statue ran out over 1 yr.

If the Island Packet is a chamber member, why are they not seeking this transparency from all the chambers they are also members of.
Why has the Island Packet not reported that Skip Hoagland was kicked out of the Beaufort Chamber for asking for this financial info and labeled a trouble maker?
Why have they not reported that he was refused membership in 4 SC Chambers and first businessman in SC/USA history in over 100 yrs this has happened to?
Why are they not reporting Russ Keep, local lawyer in good standing, was denied membership in the Hilton Head chamber?
Why are they not reporting Ryan McAvoy has sued the Hilton Head Chamber for the same refusal to access the financials for all members?

Chamber members are in essence owners, stakeholders, investors, shareholders. Only one reason, Bill Miles and Blakely Williams refuse transparency and will not even volunteer to open their books, they have a lot to hide. These Chambers must be now investigated and forensically audited like the FBI just did on the Berkeley County SC chamber and school CFO. In fact, we must do an investigation on Jeff Moss, Superintendent of Beaufort County schools, Steve Riley Hilton Head Town manager and the lawyers, Gary Kubic / Josh Gruber of Beaufort County.

The secrecy and corruption in Beaufort County runs wide and deep.

Houston / Hilton Head / Beaufort, we have a problem.

I will continue to fight for all chamber members and taxpayers to force all those who run our towns and non-profits to be transparent and accountable. The corruption, crookedness, theft, secrecy on all our money must end.

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Sep 2, 2017, at 5:38 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

Tabor / Rick / Mike / Stu, are you all serious or is this a joke and fake news report? I know Lucas High, he is a good honest

current Berkeley country SC FBI raid, must be incompetent. Fact Jeff Moss lied and he hired the cookie cutter audit under great suspicion. Fact, you lie once you will lie twice and much more. All 4 of you have to be either corrupted, never read the Reagan principal or just plan incompetent. Something is bad wrong and more reason for a forensic audit and law enforcement involvement. Our town officials are so corrupted, we need outside emergency help. We are in severe corrupted crisis. Mr Covert, to my knowledge is the only one out of these men who have a clue on how to run and build a local company. How could myself or others trust you in business, or buy air conditioning from you if you can't keep you campaign promises and force transparency? Mike wake up, you will sell more air conditioning units as a champion of tax payers, than you will as a influenced corrupted crook or in fear to not speak up and act and committing fraud not living up to your campaign promises. This is not the way to build your local business.

You said in the article:
"Council members Mike Covert, Rick Caporale, Tabor Vaux and Stu Rodman made the informal recommendation and were careful not to call for a "forensic" audit, which they say would hint at criminal wrongdoing.

Instead, the councilmen suggested what they refer to as an external audit, but offered few specifics on how deep the audit should go."

Then worse, and only someone either highly corrupted of incompetent would say Quote.

"Covert and Caporale, though, were adamantly against a forensic audit."

Can we get honesty from any of you, no games and fully explain your position and why ? Tell us how you plan to confirm we have no theft, fraud, embezzlement or credit card misuse? Why in the hell do you think an audit would just focus on credit cards? No one could be that clueless.

You all know and even an ignorant buffoon knows after all our education, a hired cookie cutter audit by crooks Jeff Moss, Bill Miles, Steve Riley, Gary Kubic and Marc Orlando are not designed to catch fraud, theft, embezzlement and credit card misuse, only a forensic audit does this. I believe the audits they hired will prove they purposely overlooked embezzlement, etc and like Berkeley SC school CFO and Palm Beach Cvb audit will prove this. Both their hired audits and many more in the USA, once forensically audited, prove an audit hired by a crook, versus independent audits are corrupted.

Perhaps you 4 men need to know, and more education, never in the history of the entire USA has a forensic audit been done on anyone who fights to not comply, or even volunteer to a forensic audit or an FBI investigation on a school system, Chamber, Town Government, City Dmo or Cvb where wrongdoing was not discovered and most cases resulted in prison.

So are you going to continue to be in denial, act like corrupted ignorant buffoons, or are you going to clean up your act, get tough and do what's right?

Do you 4 men really believe that no forensic audits are needed, after FBI raid on Berkeley sc School CFO 400k theft? Do you really think lying Jeff Moss is honest?

Read this Palm Beach audit or are you so corrupted and incompetent it makes no difference to you.

http://www.mypalmbeachclerk.com/uploadedFiles/Public_Funds/conv_ctr_audit_report.pdf

Do you think I am out of mind when I tell you Jeff Moss, Bill Miles, Ray Deal, Ray Warco and many others are going to prison once a forensic audit is done or a FBI raid happens? Do you 4 men actually believe a cooker cutter independent audit will catch fraud, theft and embezzlement? No one of normal thinking, could possibly believe this. The entire Beaufort county system and every single person who has access to or control of our tax dollars, needs to be forensically audited and seems now all of you included. Are you 4 men, worried about hurting someone's feelings? Perhaps you just all trust fellow man? If your answer is yes to these questions, you are more incompetent than I thought and about as useless of an elected official as we could have.
http://www.islandpacket.com/news/local/community/beaufort-news/article170793012.html

To end, you were all elected based on your campaign promises, that none of you have honored to date, you seem to all have intentionally committed fraud to local tax payers. So yes I am calling you all frauds along with the frauds, liars and thieves you now try to protect. Not one elected official or Mayor is forcing transparency, accountability or proven performance metrics in the entire Beaufort county. You are all weak gutless frauds. May God or the FBI help and save us in Beaufort county, seems our only 2 hopes. Don't count on God, he has a very busy schedule.
Thanks

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 27, 2017, at 1:02 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

Once the FBI gets involved, which I feel is imminent, this board will not fair well. Forensic audit is certain to put Moss in prison. A bigger fish will be the Audit firm in Charleston, that Moss hired, as well as over 10 School districts around the state to do cookie cutter audits on billions of dollars. Based on what just happened in Berkeley sc with the School CFO theft of 400k and the Chamber embezzlement, does anyone on this email actually believe, including this School board, FBI, IRS and God himself, forencic audits will not discover massive corruption, fraud, embezzlement of millions across this state? There is only one reason any School board or Town council would not vote in favor of an audit, they are crooks 100%, either paid off, receive kick backs, outside jobs for friends or relatives, etc etc. It can't be based on incompetence, as no one could be this illiterate.

1.School board majority- refuses to vote for audit ?

2.Hilton Head Town Council -Refuses to vote for audit on proven crooks Bill miles or Steve Riley. John Mcann and other council members are proven crooks and liars. They are on record saying we saw the books no audit needed a lie, we trust everyone a lie, and finally a classic statement from a council member, "no audit we are scared of what we will find"

3.Beaufort Town Council refuses to vote for audit on all Chambers or Gary Kubic.

4 Bluffton Town council refuses to vote for audit on Marc Orlando and crook Lying Mayor Sulka. They both have been caught using Town employees illegally on tax payers paid time to profit a private corporation.

4 Sarah Borton refuses to allow the young reporters or editors to tell the real story on local corruption on her friends and large advertisers. USCB Jane Upshaw, Bill miles, Atax committee members, LCGOA her husband Brett Borton ran Connected to many local crooks. She refuses to report on all the lawsuits I have filed and filing. She deletes Blog post from any articles that favor me and my exposure.

5. Attorney general, SC ethics commission, Sled, Governor has done zero and in fact some of these under suspicion themselves.

6. Local elected officials Mark Sanford, Tim Scott, Tom davis, Weston Newton, Jeff Bradley and Bill Herbkersman have done zero. We need to face them at every public place where they speak and force them to answer our questions. They all need to be booted and publicly humiliated. Crook lawyer David Tigges of McNair law firm was appointed to the SC chamber board by crook and Lying Ted Pitts and David tigges secret lawyer for Steve Riley and lawyer for Bill miles fighting my Foia lawsuit in the Supreme Court. Crooked is an option understatement, imagine politicians say have not made up their minds yet?

http://www.postandcourier.com/news/bill-would-help-south-carolina-nonprofits-avoid-foia-requests-even/article_5b0ede4c-0b1d-11e7-9666-c7c6e3e329b0.html

7. Perhaps the most laughable and corrupt of all is all the Town councils in Beaufort county joined all the Chambers as members using our tax money. No Island Packet story on this? Who is a member just crook Steve Riley who wrote the checks, all council members ? Or all tax payers ? They all will not force as members, the Chambers to open their books to members under the sc non profit corporation act laws. They are all crooked. Sarah Borton will not report this ?

8. The law local Hilton head Chamber crooks Bill Miles and his appointed new puppet Chairman Jay weindl manager of the Sonesta Resort have denied a chamber membership to local lawyer Russ Keep, who is in good standing in this community for 40 yrs and known for his honesty and integrity. This is outrageous a Atax public funded Chamber, plus a Chamber Steve Riley joined would deny Russ Keep from becoming a member as they suspected he would demand access to the books under the sc non profit corporation act. They also denied me 3-4 yrs ago when crook Tom Upshaw past President of Palmetto Electric was Chamber Chairman. They now are denying a member Ryan McAvoy his request to the chamber books under his right as a member to full compliance under the SC non profit corporation act laws. Bill miles, Ray deal controller and Jay weindl are claiming his membership was denied after they fully accepted Ryan and cashed his check. Skip Hoagland was kicked out of the Beaufort Chamber for asking for access to the books under the sc non profit corporation act laws. I was denied membership in the SC Chamber, Myrtlebeach Chamber, Charleston Cvb. I was accepted by the Greater Bluffton Chamber, perfectly operated and will fully comply to Foia laws, non profit act laws etc.

Folks all has never happened to 3 local business people and one a lawyer, in 100 yr history in the entire USA. This could not be anymore criminal. Sarah Borton will not report it ?

Like I said citizens and tax payers in Beaufort county are surrounded by crooks in every corner. Even local judges tied to crooks. Incestous SC, perhaps there is no hope and only choice is to live with it and accept the fact this is the way it will be in SC. No transparency, no audits, limited Foia, no procurements, no non profit corporation act laws.

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

On Aug 27, 2017, at 1:52 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

Shocking ! Audit firm Bill miles hired JW hunt company in Columbia ,same audit firm as Charleston Cvb.
Bobby Creech auditor at this firm quits and now works for Bill miles accountant Ray Warco at Webster Rogers on Hilton Head?
John Mcann announces run for Mayor he is a liar
Kim Likins and lawyers caught stealing 200k to fund a private lawsuit.
David tigges , Bill miles lawyer secretly represents Steve riley.
Sarah Borton will not cover anything that does not slant to protect
The list goes on and on and on and on

My God we are all in trouble. Houston we have a problem !!!!

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

Begin forwarded message:

From: CC Hoagland <skiphoagland@yahoo.com>
Date: August 27, 2017 at 1:33:39 PM GMT-3
To: fran bisi <eyelandart@yahoo.com>, mark@marksanford.com, Tim Scott <joe_mckeown@scott.senate.gov>, jwiendl@sonesta.com, tecklenburgj@charleston-sc.gov, jrhodes@cityofmyrtlebeach.com, psommerville@bcgov.net
Cc: "Caporale, Rick" <rcaporale@bcgov.net>, "Orischak, Josephine A" <Josephine.Orischak@beaufort.k12.sc.us>, REBECCA BASS <muttleycrew2008@gmail.com>, Jim Bequette <jwbterp@aol.com>, Marilyn Bullard <bullardpiwko@aol.com>, jerry at the beach <gringoviejotwo@yahoo.com>, Tony Cambria <info@windrunnerstables.com>, "mkeel@sled.sc.gov" <mkeel@sled.sc.gov>, "Meyerhofer, Kelly" <kmeyerhofer@islandpacket.com>, "Gwozdz, Christina S" <Christina.Gwozdz@beaufort.k12.sc.us>, "Flewelling, Brian" <brianf@bcgov.net>, "Kinton, Geraldine C" <Geraldine.Kinton@beaufort.k12.sc.us>, "shannonerickson@schouse.org" <shannonerickson@schouse.org>, "johncrangle2@gmail.com" <johncrangle2@gmail.com>, "Stewart, Jerry" <jstewart@bcgov.net>, "Dawson, Gerald" <gdawson@bcgov.net>, Rick Brundrett <rbrundrett@islandpacket.com>, "michaelrivers@schouse.gov" <michaelrivers@schouse.gov>, "Campbell, Earl" <earl.campbell@beaufort.k12.sc.us>, "ami@ethics.sc.gov" <ami@ethics.sc.gov>, "jdpc@hargray.com" <jdpc@hargray.com>, "tom@senatortomdavis.com" <tom@senatortomdavis.com>, "Dunkle, Joseph R" <Joseph.Dunkle@beaufort.k12.sc.us>, "taylor@harrisonfirm.com" <taylor@harrisonfirm.com>, Liz Farrell <efarrell@islandpacket.com>, "Staton, Jennifer A" <Jennifer.Staton@beaufort.k12.sc.us>, "pgrant@sled.sc.gov" <pgrant@sled.sc.gov>, "tmbdab@aol.com" <tmbdab@aol.com>, "marksanford99@gmail.com" <marksanford99@gmail.com>, "Fobes, Steve" <sfobes@bcgov.net>, Joseph Iaco <jiaco@bellsouth.net>, "Rodman, Stewart" <srodman@bcgov.net>, "awilson@scag.gov" <awilson@scag.gov>, "Spiker149@hargray.com" <Spiker149@hargray.com>, "wnewton@jsplaw.net" <wnewton@jsplaw.net>, "cnrgbr@hargray.com" <cnrgbr@hargray.com>, "deann.komanecky@blufftontoday.com" <deann.komanecky@blufftontoday.com>, "zoomru@yahoo.com" <zoomru@yahoo.com>, "Gregory, Cynthia W" <Cynthia.Gregory@beaufort.k12.sc.us>, John Dowling <dowlingjohn287@gmail.com>, "rgregory@sled.sc.gov" <rgregory@sled.sc.gov>, "shamm@ethics.sc.gov" <shamm@ethics.sc.gov>, "jbagnall@ethics.sc.gov" <jbagnall@ethics.sc.gov>, "Cordray, Mary M" <Mary.Cordray@beaufort.k12.sc.us>, "jeffbradley@schouse.gov" <jeffbradley@schouse.gov>, "dwilliams@sled.sc.gov" <dwilliams@sled.sc.gov>, "mburchstead@ethics.sc.gov" <mburchstead@ethics.sc.gov>, "usn1066@gmail.com" <usn1066@gmail.com>, "lgibson@scag.gov" <lgibson@scag.gov>, "Crosby, Tonya V" <Tonya.Crosby@beaufort.k12.sc.us>, "aldenbauer706@gmail.com" <aldenbauer706@gmail.com>, "Cushingberry, Robyn L" <Robyn.Cushingberry@beaufort.k12.sc.us>, "contact@beaufortwatchdog.org" <contact@beaufortwatchdog.org>, "Payne, Wilbur M" <Wilbur.Payne@beaufort.k12.sc.us>, Auditor <auditor@bcgov.net>, "Striebinger, David R" <David.Striebinger@beaufort.k12.sc.us>, "Covert, Michael" <mcovert@bcgov.net>, tdavis@harveyandbattey.com, "William G. Bill Herbkersman" <schsdistrict118@aol.com>, John Munro <JMunro@seapines.com>, Steve Birdwell <sbirdwell@seapines.com>, gerard mahieu <gerardmahieu@aol.com>, Marc Frey <mfrey@freymedia.com>, Sarah Borton Sarah Borton <sgillis@islandpacket.com>, Jay Bender <jbender@brblegal.com>, Dave Schwartz <dave@scpolicycouncil.org>, Jim Carpenter <james.carpenter@carpenterlawfirm.net>, Cynthia Bensch <bensch@hargray.com>, David Ames <amesco@earthlink.net>, Lee Bright <Lee@brightagencyinc.com>, Russ Keep <hhlaw@hargray.com>, joeborelli1@mac.com, Justin New Orleans Lawyer Justin New Orleans Lawyer <jwinch@smithstag.com>, Art Davis <art@globallylocally.com>, Jeremia Froyland <jeremiafroyland@gmail.com>, josh metnick <josh@chicago.com>, Fred Mercaldo <fred@scottsdale.com>, Austin Andrukaitis <austinandrukaitis@gmail.com>, John Keener <john@charlestoncrabhouse.com>, John Durst <john@scrla.org>, nancy watt <wtghhi@aol.com>, linda rew <linda@hiltonhead.com>, dan@media360.com, eric@laislamagazine.com, Ryan McAvoy <mcavoylegend@gmail.com>
Subject: May God help us !!!! same audit firm Jeff Moss hired was just hired as new audit firm by Berkelev School system after FBI discovered 400k theft. Houston we have a

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Read link below, oh my God new audit firm for Berkeley county Schools the FBI just discovered 400k in theft on, Berkeley school board just hired the same firm Jeff moss and ten others hired ? No procurement? No clue this firm like their last firm that missed the 400k theft, is under suspicion of missing theft/ misuse by Jeff Moss.
Folks we are in big trouble !

Again the full time employees and lawyers have seized total control from the few honest and mostly corrupted Part time board members. I know of no successful company where the employees tell the owners what to do and worse refuse the owners access to see the books ? This is simply massive insanity and an extremely broken and failed system. Only one act will work under this Broken system, a Forencic audit and FBI / IRS investigation. No one in SC can be trusted no one. Reagan theory only!

It is very sad to watch so many good people fight so hard to try and win against all this corruption without an audit. There is zero chance of victory without it. Moss and his full time lawyer, along with those they have corrupted on the board, will never be stopped without being forced to audit. Then the question becomes who gets hired to do the forensic audit that can be trusted in SC. This will need to be out of state or better all overseen and done in alliance with the FBI investigation like Berkeley SC.

My God again our investigative team just discovered Berkeley county just hired a new audit firm and same firm Jeff Moss hired. This firm once audited like Palm beach and the last audit firm will also turn out to have missed massive corruption by Jeff Moss. The question is, and FBI needs to act, will this firm and its auditors be tied to the corruption and embezzlement ? Houston we have a problem ? How is it possible FBI catches this theft and now the Jeff moss hired audit firm is hired by the Berkeley school board ?

https://www.berkeleyind.com/news/school-board-agrees-on-new-auditor/article_ddb0077e-35c8-11e7-acac-2f2854e94e89.html

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 27, 2017, at 10:38 AM, Orischak, Josephine A <Josephine.Orischak@beaufort.k12.sc.us> wrote:

> Jerry,
>
> Regarding our new meeting structure, Joseph Dunkle's reservations about it not providing adequate time to discuss topics are most relevant. Look at it this way: the board previously had six committees, four of which met monthly/regularly for (approximately) 2 hours each. That's **8 hours** worth of discussion of **important issues** that was taking place each month. This estimate doesn't even include the two committees (HR and Legislative) that met periodically, as well.
>
> We've now cut that monthly discussion time literally in half down to **4 hours**.
>
> While we all appreciate the notion of reducing meeting costs, I am not sure how valid this argument is now that we know the potential costs of upgrading central office's video recording capabilities.
>
> In summary, the Board (in whole or part) will only be publicly gathered twice monthly now. As such, my greatest concern remains that the Board will be asked to vote/take action with considerably less time to discuss/vet important issues.
>
> JoAnn Orischak
> District 11
>
> Sent from my iPad
>
> On Aug 27, 2017, at 8:13 AM, "jerry at the beach" <gringoviejotwo@yahoo.com> wrote:
>
> > More money? Less transparency? The effects of Beaufort County school board's meeting changes
> >
> >

More money? Less transparency? The effects of Beaufort County school boa...

Changes to Beaufort County Board of Education meetings in South Carolina could cost the district more money and,...

Board member Kinton said: *"Eliminating committee meetings will save the district money, argued Kinton, who spearheaded the overhaul of the meeting format."*

When Candidate Kinton was asked; What specific steps will you take to make government more open and accessible to the public?

Candidate Kinton said: *"I believe the school board should govern by committees that include community members. Committees should be charged with researching topics, hearing recommendations from administration, challenging administration recommendations when appropriate and making final recommendations to the full school board. Board committees will provide more opportunities for parents, citizens and stakeholders to become engaged, informed and involved in the process of educating our children."*

Oh, my! Read it again folks, and if you don't believe me, here is the link.
http://www.islandpacket.com/news/politics-government/election/article33484737.html#storylink=cpy

G.A. Smith
Well represented in Dist. 11

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 31, 2017, at 7:32 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> It's time to get serious and do what's right . The corruption, lack of transparency, accountability, proven performance metrics, lies, secrecy and denial must end. If our County officials will not act, then we need to get state and federal authorities to force them. This crisis must end !!!
> It's time to now file a lawsuit. Please everyone send me your ideas for this. Beaufort Watch Dog will pay all cost !

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

page1image256

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 28, 2017, at 4:20 AM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> I will address the "audit" for those not copied on my last email. A financial audit performed by an independent accounting firm is addressing the financial condition at a given point in time. Their primary focus is to determine if the income statement and balance sheet is a fair reflection of the financial condition and performance**when taken as a whole**. If you read the supplemental opinion, that is what the accountant is saying. He is not giving an opinion as to the proper allocations of income and expenses. Therefore, in order to establish the true income and expense from each activity you must see a detailed general ledger and other documents and records to make our own determination as to the true allocation of income and expenses and thus the unrelated business income. The schedules attached to these financial statements reflect exactly -0- for the net income from each activity other than members services. As any reasonable person would know, this is not possible.
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

On Jul 28, 2017, at 4:00 AM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> I would like to address the UBI issue from the earlier emails. Most of the 90 or so whistleblower filings I have filed on Cvbs Chambers city Dmos report no or very little UBI. This is because they offset the income with the cost to produce this income. They are incurring labor cost to develop the webpage for the local chamber and CVB which promotes the city while also producing advertisements for businesses willing to pay them to be listed. These same employees are utilized to develop the site to book hotel rooms and flights etc. Their 990s frequently show exactly -0- for UBI. Others show losses while a few show some small profits. (Only a couple reflect any significant UBI) If a CVB shows a loss, then it means that membership dues or government funding subsidized these efforts. The problem remains that almost none of them make any effort to split our their labor and other costs to produce the UBI. Therefore we do not know how much they are truly making or even what their gross revenue is from these activities. If for example they received $10M from advertisers and from booking revenues and only $5M from membership dues and state and federal grants, they might show -0- unrelated business income due to how they allocate expenses. The CVB's and Chambers will spend all they get as there is no profit motive.
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

On Jul 27, 2017, at 6:37 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> > Cookie cutter audits are not meant to catch crimes. This is why our state is in trouble. Never in the 100 year history
> > has any School districts, chambers and towns been forensically audited.
> > Berkeley county SC first one on Sc. Those in other states that have refused forencic audits and then forced or investigated by the FBI IRS investigations have mostly resulted in prison. Here is your answer. Palm beach type audits
> >
> > Sent from my iPhone excuse all typos and misspellings
> >
> > Skip Hoagland
> > US cell 843-384-7260
> > Buenos Aires , Argentina
> > 011-54-9-11-5942-3202

On Jul 27, 2017, at 5:59 PM, fran bisi <eyelandart@yahoo.com> wrote:

> > > I think what you have attached isn't referring to a forensic audit, but a CAFR that Moss was referring to...AKA Cookie Cutter.
> > >
> > > ***fran***

On Thursday, July 27, 2017 5:22 PM, "Caporale, Rick" <rcaporale@bcgov.net> wrote:

> > Fran:

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

should all recall the role (complicity?) of auditing firms in the financial meltdown. A few of whom are no longer in business. Have we forgotten so soon? The attached document ("Are Audits Worthless") is worth a quick read.

RC

From: fran bisi [eyelandart@yahoo.com]
Sent: Thursday, July 27, 2017 4:19 PM
To: Orischak, Josephine A; REBECCA BASS
Cc: Jim Bequette; Marilyn Bullard; jerry at the beach; Tony Cambria; mkeel@sled.sc.gov; Meyerhofer, Kelly; Gwozdz, Christina S; Flewelling, Brian; Kinton, Geraldine C; shannonerickson@schouse.org; johncrangle2@gmail.com; Stewart, Jerry; Dawson, Gerald; Rick Brundrett; skiphoagland@yahoo.com; michaelrivers@schouse.gov; Campbell, Earl; ami@ethics.sc.gov; jdpc@hargray.com; joe_mckeown@scott.senate.gov; tom@senatort Dunkle, Joseph R; taylor@harrisonfirm.com; Liz Farrell; Staton, Jennifer A; pgrant@sled.sc.gov; tmbdab@aol.com; marksanford99@gmail.com; Fobes, Steve; Joseph Iaco; Caporale, Rick; Rodman, Stewart; awilson@scag.gov; Spiker149@hargray.com; wnewton@jsplaw.net; cnrgbr@hargray Gregory, Cynthia W; John Dowling; rgregory@sled.sc.gov; shamm@ethics.sc.gov; jbagnall@ethics.sc.gov; Cordray, Mary M; jeffbradley@schouse.gov; dwilliams@sled.sc.gov; mburchstead@ethics.sc.gov; usn1066@ Crosby, Tonya V; aldenbauer706@gmail.com; Cushingberry, Robyn L; contact@beaufortwatchdog.org; Payne, Wilbur M; Auditor; Striebinger, David R; Covert, Michael
Subject: Re: Moss Letter to editor July 26,2017 @5:13

If I'm correct they "selected 40 transactions" for Fiscal Year 2016. They were "examined for compliance with the District's procurement policy and not exceptions were noted." Whatever that means, I'm not impressed. That's less than a day's worth of transactions.

Example: on Jan 5th and 6th of 2016 there were 37 transactions and that's not counting those under $100.

Is this what he calls an audit?

fran

On Thursday, July 27, 2017 1:53 PM, "Orischak, Josephine A" <Josephine.Orischak@beaufort.k12.sc.us> wrote:

All,

FYI: Here is a link to the BCSD website for Procurement Audits performed from 2013 to the present. Open the 'Other Financial Reports' folder to view.

http://beaufortschools.net/cms/one.aspx?portalId=170925&pageId=296554

JoAnn Orischak
Beaufort County Board of Education
District 11

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Sent from my iPad

On Jul 27, 2017, at 9:36 AM, "REBECCA BASS" <muttleycrew2008@gmail.com<mailto:muttleycrew2008@gmail.com>> wrote:

In his letter, Moss does say "they are reviewed each year by a pair of separate independent audits". We should request copies of these audits and ask who conducted them.

Rebecca

On Thu, Jul 27, 2017 at 9:25 AM, Jim Bequette <jwbterp@aol.com<mailto:jwbterp@aol.com>> wrote:

I am attaching a letter written by the Superintendent which was printed in last night's internet edition of the Packet/Gazette. Moss asserts that letter writers have asserted that "Beaufort County School District employees have misused tax dollars" using district credit cards. He then states "nothing could be further from the truth".

Why does he not promote having a forensic audit to assure us taxpayers that his statement is factual? Why aren't we given all the facts on the admitted 47 fraudulent charges on those card?. Who did the two separate independent "reviews" of P-card that he cites in this letter? Note he doesn't say audits. I will submit an FOIA request for the "reviews".

I read the county government spends about $1 million a year on credit cards while the School District is up about $25 million. The county budget is smaller than 1/2 of the school's.

Many, many charges on those P-cards as reported by Fran Bisi look very questionable. Superintendent Moss can only quiet down the public uproar by immediately having the Board approve a forensic audit. How can you take his statements as fact after he was already found in two ethics violations?

Last I would like to commend Fran Bisi for her great work in exposing what could be a monumental problem. However if Moss and the Board do not approve a forensic audit, the citizens will never know the truth or trust them.

Jim Bequette Retired CPA in Md, WV, and SC

--
Rebecca W. Bass
Broker in Charge
SeaBass Properties Real Estate
Licensed in South Carolina and Georgia
843-263-3772

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

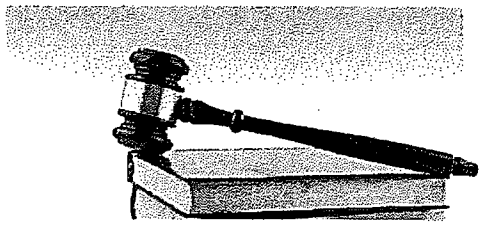
Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 27, 2017, at 1:33 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> Read link below, oh my God new audit firm for Berkeley county Schools the FBI just discovered 400k in theft on, Berkeley school board just hired the same firm Jeff moss and ten others hired ? No procurement? No clue this firm like their last firm that missed the 400k theft, is under suspicion of missing theft/ misuse by Jeff Moss.
> Folks we are in big trouble !
>
> Again the full time employees and lawyers have seized total control from the few honest and mostly corrupted Part time board members. I know of no successful company where the employees tell the owners what to do and worse refuse the owners access to see the books ? This is simply massive insanity and an extremely broken and failed system. Only one act will work under this Broken system, a Forencic audit and FBI / IRS investigation. No one in SC can be trusted no one. Reagan theory only!
>
> It is very sad to watch so many good people fight so hard to try and win against all this corruption without an audit. There is zero chance of victory without it. Moss and his full time lawyer, along with those they have corrupted on the board, will never be stopped without being forced to audit. Then the question becomes who gets hired to do the forensic audit that can be trusted in SC. This will need to be out of state or better all overseen and done in alliance with the FBI investigation like Berkeley SC.
>
> My God again our investigative team just discovered Berkeley county just hired a new audit firm and same firm Jeff Moss hired. This firm once audited like Palm beach and the last audit firm will also turn out to have missed massive corruption by Jeff Moss. The question is, and FBI needs to act, will this firm and its auditors be tied to the corruption and embezzlement ? Houston we have a problem ? How is it possible FBI catches this theft and now the Jeff moss hired audit firm is hired by the Berkeley school board ?
>
> https://www.berkeleyind.com/news/school-board-agrees-on-new-auditor/article_ddb0077e-35c8-11e7-acac-2f2854e94e89.html
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

On Aug 27, 2017, at 10:38 AM, Orischak, Josephine A <Josephine.Orischak@beaufort.k12.sc.us> wrote:

> Jerry,
>
> Regarding our new meeting structure, Joseph Dunkle's reservations about it not providing adequate time to discuss topics are most relevant. Look at it this way: the board previously had six committees, four of which met monthly/regularly for (approximately) 2 hours each. That's **8 hours** worth of discussion of **important issues** that was taking place each month. This estimate doesn't even include the two committees (HR and Legislative) that met periodically, as well.
>
> We've now cut that monthly discussion time literally in half down to **4 hours**.
>
> While we all appreciate the notion of reducing meeting costs, I am not sure how valid this argument is now that we know the potential costs of upgrading central office's video recording capabilities.
>
> In summary, the Board (in whole or part) will only be publicly gathered twice monthly now. As such, my greatest concern remains that the Board will be asked to vote/take action with considerably less time to discuss/vet important issues.
>
> JoAnn Orischak
> District 11
>
> Sent from my iPad
>
> On Aug 27, 2017, at 8:13 AM, "jerry at the beach" <gringoviejotwo@yahoo.com> wrote:



More money? Less transparency? The effects of Beaufort County school boa...

Changes to Beaufort County Board of Education meetings in South Carolina could cost the district more money and,...

Board member Kinton said: *"Eliminating committee meetings will save the district money, argued Kinton, who spearheaded the overhaul of the meeting format."*

When Candidate Kinton was asked; What specific steps will you take to make government more open and accessible to the public?

Candidate Kinton said: *"I believe the school board should govern by committees that include community members. Committees should be charged with researching topics, hearing recommendations from administration, challenging administration recommendations when appropriate and making final recommendations to the full school board. Board committees will provide more opportunities for parents, citizens and stakeholders to become engaged, informed and involved in the process of educating our children."*

Oh, my! Read it again folks, and if you don't believe me, here is the link.
http://www.islandpacket.com/news/politics-government/election/article33484737.html#storylink=cpy

G.A. Smith
Well represented in Dist. 11

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 31, 2017, at 7:32 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> It's time to get serious and do what's right . The corruption, lack of transparency, accountability, proven performance metrics, lies, secrecy and denial must end. If our County officials will not act, then we need to get state and federal authorities to force them. This crisis must end !!!
> It's time to now file a lawsuit. Please everyone send me your ideas for this. Beaufort Watch Dog will pay all cost !

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

page1image256

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 28, 2017, at 4:20 AM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> I will address the "audit" for those not copied on my last email. A financial audit performed by an independent accounting firm is addressing the financial condition at a given point in time. Their primary focus is to determine if the income statement and balance sheet is a fair reflection of the financial condition and performance**when taken as a whole**. If you read the supplemental opinion, that is what the accountant is saying. He is not giving an opinion as to the proper allocations of income and expenses. Therefore, in order to establish the true income and expense from each activity you must see a detailed general ledger and other documents and records to make our own determination as to the true allocation of income and expenses and thus the unrelated business income. The schedules attached to these financial statements reflect exactly -0- for the net income from each activity other than members services. As any reasonable person would know, this is not possible.
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

On Jul 28, 2017, at 4:00 AM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> I would like to address the UBI issue from the earlier emails. Most of the 90 or so whistleblower filings I have filed on Cvbs Chambers city Dmos report no or very little UBI. This is because they offset the income with the cost to produce this income. They are incurring labor cost to develop the webpage for the local chamber and CVB which promotes the city while also producing advertisements for businesses willing to pay them to be listed. These same employees are utilized to develop the site to book hotel rooms and flights etc. Their 990s frequently show exactly -0- for UBI. Others show losses while a few show some small profits. (Only a couple reflect any significant UBI) If a CVB shows a loss, then it means that membership dues or government funding subsidized these efforts. The problem remains that almost none of them make any effort to split our their labor and other costs to produce the UBI. Therefore we do not know how much they are truly making or even what their gross revenue is from these activities. If for example they received $10M from advertisers and from booking revenues and only $5M from membership dues and state and federal grants, they might show -0- unrelated business income due to how they allocate expenses. The CVB's and Chambers will spend all they get as there is no profit motive.
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

On Jul 27, 2017, at 6:37 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> > Cookie cutter audits are not meant to catch crimes. This is why our state is in trouble. Never in the 100 year history
> > has any School districts, chambers and towns been forensically audited.
> > Berkeley county SC first one on Sc. Those in other states that have refused forencic audits and then forced or investigated by the FBI IRS investigations have mostly resulted in prison. Here is your answer. Palm beach type audits
> >
> > Sent from my iPhone excuse all typos and misspellings
> >
> > Skip Hoagland
> > US cell 843-384-7260
> > Buenos Aires , Argentina
> > 011-54-9-11-5942-3202

On Jul 27, 2017, at 5:59 PM, fran bisi <eyelandart@yahoo.com> wrote:

> > > I think what you have attached isn't referring to a forensic audit, but a CAFR that Moss was referring to...AKA Cookie Cutter.
> > >
> > > ***fran***
> > >
> > > On Thursday, July 27, 2017 5:22 PM, "Caporale, Rick" <rcaporale@bcgov.net> wrote:
> > >
> > > Fran:

When we think or talk about audits, we

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

A few of whom are no longer in business. Have we forgotten so soon? The attached document ("Are Audits Worthless") is worth a quick read.

RC

From: fran bisi [eyelandart@yahoo.com]
Sent: Thursday, July 27, 2017 4:19 PM
To: Orischak, Josephine A; REBECCA BASS
Cc: Jim Bequette; Marilyn Bullard; jerry at the beach; Tony Cambria; mkeel@sled.sc.gov; Meyerhofer, Kelly; Gwozdz, Christina S; Flewelling, Brian; Kinton, Geraldine C; shannonerickson@schouse.org; johncrangle2@gmail.com; Stewart, Jerry; Dawson, Gerald; Rick Brundrett; skiphoagland@yahoo.com; michaelrivers@schouse.gov; Campbell, Earl; ami@ethics.sc.gov; jdpc@hargray.com; joe_mckeown@scott.senate.gov; tom@senatortomdavis.com; Dunkle, Joseph R; taylor@harrisonfirm.com; Liz Farrell; Staton, Jennifer A; pgrant@sled.sc.gov; tmbdab@aol.com; marksanford99@gmail.com; Fobes, Steve; Joseph Iaco; Caporale, Rick; Rodman, Stewart; awilson@scag.gov; Spiker149@hargray.com; wnewton@jsplaw.net; cnrgbr@hargray.com; deann.komanecky@blufftontoday.com; zoomru@yahoo.com; Gregory, Cynthia W; John Dowling; rgregory@sled.sc.gov; shamm@ethics.sc.gov; jbagnall@ethics.sc.gov; Cordray, Mary M; jeffbradley@schouse.gov; dwilliams@sled.sc.gov; mburchstead@ethics.sc.gov; usn1066@gmail.com; lgibson@scag.gov; Crosby, Tonya V; aldenbauer706@gmail.com; Cushingberry, Robyn L; contact@beaufortwatchdog.org; Payne, Wilbur M; Auditor; Striebinger, David R; Covert, Michael
Subject: Re: Moss Letter to editor July 26,2017 @5:13

If I'm correct they "selected 40 transactions" for Fiscal Year 2016. They were "examined for compliance with the District's procurement policy and not exceptions were noted." Whatever that means, I'm not impressed.
That's less than a day's worth of transactions.

Example: on Jan 5th and 6th of 2016 there were 37 transactions and that's not counting those under $100.

Is this what he calls an audit?

fran

On Thursday, July 27, 2017 1:53 PM, "Orischak, Josephine A" <Josephine.Orischak@beaufort.k12.sc.us> wrote:

All,

FYI- Here is a link to the BCSD website

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Financial Reports' folder to view.

http://beaufortschools.net/cms/one.aspx?portalId=170925&pageId=296554

JoAnn Orischak
Beaufort County Board of Education
District 11
Hilton Head Island
C. (843) 338-1737

Sent from my iPad

On Jul 27, 2017, at 9:36 AM,
"REBECCA BASS"
<muttleycrew2008@gmail.com<mailto:muttleycrew2008@gmail.com>>
wrote:

In his letter, Moss does say "they are reviewed each year by a pair of separate independent audits". We should request copies of these audits and ask who conducted them.

Rebecca

On Thu, Jul 27, 2017 at 9:25 AM, Jim Bequette
<jwbterp@aol.com<mailto:jwbterp@aol.com>>
wrote:

I am attaching a letter written by the Superintendent which was printed in last night's internet edition of the Packet/Gazette. Moss asserts that letter writers have asserted that "Beaufort County School District employees have misused tax dollars" using district credit cards. He then states "nothing could be further from the truth".

Why does he not promote having a forensic audit to assure us taxpayers that his statement is factual? Why aren't we given all the facts on the admitted 47 fraudulent charges on those card?. Who did the two separate independent "reviews" of P-card that he cites in this letter? Note he doesn't say audits. I will submit an FOIA request for the "reviews".

I read the county government spends about $1 million a year on credit cards while the School District is up about $25 million. The county budget is smaller than 1/2 of the school's.

Many, many charges on those P-cards as reported by Fran Bisi look very questionable. Superintendent Moss can only quiet down the public uproar by immediately having the Board approve a forensic audit. How can you take his statements as fact after he was already found in two ethics violations?

Last I would like to commend Fran Bisi for her great work in exposing what could be a monumental problem. However if Moss and the Board do not approve a forensic audit, the citizens will never know the truth or trust them.

Jim Bequette Retired CPA in Md, WV, and SC

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

SeaBass Properties Real Estate
Licensed in South Carolina and Georgia
843-263-3772

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

From: CC Hoagland skiphoagland@yahoo.com
Subject: Re: Skip Hoagland /Versus Beaufort Chamber Lawsuit update. Judge ruled in Beaufort Chamber favor to keep hiding financials from its members ?
Date: December 15, 2017 at 8:04 PM America/New_York
To: Myrtle Beach Minute david@myrtlebeachsc.com, Ryan McAvoy mcavoylegend@gmail.com, bill miles bmiles@hiltonheadisland.org, Blakely Williams blakelyw@beaufortsc.org, Robb@beaufortsc.org, susan@surfcityusa.com
Cc: Will Folks will.folks@gmail.com, John Crangle johncrangle2@gmail.com, Jay Bender jbender@brblegal.com, dpascoe@scsolicitor1.org, Sled Paul Grant Sled Paul Grant mkeel@sled.sc.gov, Attorney General Alan Wilson Attorney General Allan Wilson AWilson@scag.gov, shamm@ethics.sc.gov, mburchstead@ethics.sc.gov, jbagnall@ethics.sc.gov, Tim Scott joe_mckeown@scott.senate.gov, marksanford99@gmail.com, tdavis@harveyandbattey.com, Weston Newton wnewton@jsplaw.net, jeffbradley@schouse.gov, "William G. Bill Herbkersman" schsdistrict118@aol.com, edukes@lcre.com, Blakely Williams blakelyw@beaufortsc.org, Robb@beaufortsc.org, Billy Keyserling billyk@islc.net, psommerville@bcgov.net, tvaux@bcgov.net, Roberts Vaux roberts.vaux@vmblawfirm.com, Stephen Fastenau sfastenau@islandpacket.com, Lucas High lhigh@islandpacket.com, "Thenerve.org Rick" rbrundrett@islandpacket.com, Russ Keep hhlaw@hargray.com, gregg@alfordlawsc.com, Nickey B Maxey nickey@nickey.com, peter@mediafeedia.com, MarcG@hiltonheadislandsc.gov, davidb@hiltonheadislandsc.gov, earl.campbell@beaufort.k12.sc.us, John Dowling dowlingjohn287@gmail.com, joseph.dunkle@beaufort.k12.sc.us, Josephine.Orischak@beaufort.k12.sc.us, gringoviejotwo@yahoo.com, School Board bisi@roadrunner.com, eyelandart@yahoo.com, Tom Lennox toml@hiltonheadislandsc.gov, WilliamH@hiltonheadislandsc.gov, JohnM@hiltonheadislandsc.gov, brianh@hiltonheadislandsc.gov

Cced Ryan McAvoy who they are abusing and attacking for no reason
They are trying to say he is not a member !!
It's criminal . Bill miles cced he is a crook and thief of tax payers money and in massive violation of Irs Ubit taxes, and much more. Also add many others.
Google -Berkeley County chamber SC corruption and school CFO theft of 386k .

The Hilton Head Town council and Town employees also need to be questioned by the fbi, Sled and others. Gregg Alford Town Lawyer is behind it all as is Brain Hulbert Town Lawyer.

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Dec 15, 2017, at 7:47 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> No this against the local Beaufort Chamber and my non profit corporation act lawsuit in behalf of all members to access the financials. It's outrageous they refuse tax payers under foia and now their own members who in essence are owners, investors and stakeholders. It does not get anymore corrupt. They are hiding their crimes and Violation to Irs Ubit and unconstitutional misuse of tax monies. Lawyer Russ Keep was rejected membership in Hilton Head chamber, I was kicked out of this Beaufort Chamber for asking for access to financials. Ryan McAvoy is also suing the Hilton Head Chamber for same access in behalf of all members.
>
> Note: Foia lawsuit is for tax payers
> Non profit corporation act lawsuit is for members
>
> The crooks have seized total control of our chambers and Atax funds
>
> FBI raid on the Berkeley County chamber is the beginning of the end so are wide.
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202
>
> On Dec 15, 2017, at 4:37 PM, Myrtle Beach Minute <david@myrtlebeachsc.com> wrote:
>
> > Skip,
> >
> > Is this the Supreme Court FOIA case they won? If so, this is big news.
> >
> > Sincerely,
> >
> > David Hucks
> > myrtlebeachSC
> > MyrtleBeachSC News
> > Myrtle Beach Daily News in 1 Minute Flat
> > MyrtleBeachSC.com
> > FIND YOUR NEWS ON FACEBOOK Facebook.com/SCMyrtleBeach

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

From:
[redacted]
Gregg gregg@alfordlawsc.com
Subject:
Fwd: Skip Hoagland /Versus Beaufort Chamber Lawsuit update. Judge ruled in Beaufort Chamber favor to keep hiding financials from its members ?
Date:
December 15, 2017 at 8:37 PM America/New_York
To:
"John P. Linton Jr." Linton@wgfllaw.com

Gregory M. Alford
Alford Law Firm, LLC
18 Executive Park Rd., Bldg. 1
P.O. Drawer 8008
Hilton Head Island, SC 29938
(843) 842-5500

Begin forwarded message:

From: CC Hoagland <skiphoagland@yahoo.com>
Date: December 15, 2017 at 8:04:17 PM EST
To: Myrtle Beach Minute <david@myrtlebeachsc.com>, Ryan McAvoy <mcavoylegend@gmail.com>, bill miles <bmiles@hiltonheadisland.org>, Blakely Williams <blakelyw@beaufortsc.org>, Robb@BeaufortSC.org, susan@surfcityusa.com
Cc: Will Folks <will.folks@gmail.com>, John Crangle <johncrangle2@gmail.com>, Jay Bender <jbender@brblegal.com>, dpascoe@scsolicitor1.org, Sled Paul Grant Sled Paul Grant <mkeel@sled.sc.gov>, Attorney General Alan Wilson Attorney General Allan Wilson <AWilson@scag.gov>, shamm@ethics.sc.gov, mburchstead@ethics.sc.gov, jbagnall@ethics.sc.gov, Tim Scott <joe_mckeown@scott.senate.gov>, marksanford99@gmail.com, tdavis@harveyandbattey.com, Weston Newton <wnewton@jsplaw.net>, jeffbradley@schouse.gov, "William G. Bill Herbkersman" <schsdistrict118@aol.com>, edukes@lcre.com, Blakely Williams <blakelyw@beaufortsc.org>, Robb@BeaufortSC.org, Billy Keyserling <billyk@islc.net>, psommerville@bcgov.net, tvaux@bcgov.net, Roberts Vaux <roberts.vaux@vmblawfirm.com>, Stephen Fastenau <sfastenau@islandpacket.com>, Lucas High <lhigh@islandpacket.com>, "Thenerve.org Rick" <rbrundrett@islandpacket.com>, Russ Keep <hhlaw@hargray.com>, gregg@alfordlawsc.com, Nickey B Maxey <nickey@nickey.com>, peter@mediafeedia.com, MarcG@hiltonheadislandsc.gov, davidb@hiltonheadislandsc.gov, earl.campbell@beaufort.k12.sc.us, John Dowling <dowlingjohn287@gmail.com>, joseph.dunkle@beaufort.k12.sc.us, Josephine.Orischak@beaufort.k12.sc.us, gringoviejotwo@yahoo.com, School Board <bisi@roadrunner.com>, eyelandart@yahoo.com, Tom Lennox <toml@hiltonheadislandsc.gov>, WilliamH@hiltonheadislandsc.gov, JohnM@hiltonheadislandsc.gov, brianh@hiltonheadislandsc.gov
Subject: Re: Skip Hoagland /Versus Beaufort Chamber Lawsuit update. Judge ruled in Beaufort Chamber favor to keep hiding financials from its members ?

Cced Ryan McAvoy who they are abusing and attacking for no reason
They are trying to say he is not a member !!
It's criminal . Bill miles cced he is a crook and thief of tax payers money and in massive violation of Irs Ubit taxes, and much more. Also add many others.
Google -Berkeyley County chamber SC corruption and school CFO theft of 386k .

The Hilton Head Town council and Town employees also need to be questioned by the fbi, Sled and others.
Gregg Alford Town Lawyer is behind it all as is Brain Hulbert Town Lawyer.

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Dec 15, 2017, at 7:47 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> No this against the local Beaufort Chamber and my non profit corporation act lawsuit in behalf of all members to access the financials. It's outrageous they refuse tax payers under foia and now their own members who in essence are owners, investors and stakeholders. It does not get anymore corrupt. They are hiding their crimes and Violation to Irs Ubit and unconstitutional misuse of tax monies. Lawyer Russ Keep was rejected membership in Hilton Head chamber, I was kicked out of this Beaufort Chamber for asking for access to financials. Ryan McAvoy is also suing the Hilton Head Chamber for same access in behalf of all members.
>
> Note: Foia lawsuit is for tax payers
> Non profit corporation act lawsuit is for members

The crooks have seized total control of our chambers and Atax funds

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Dec 15, 2017, at 4:37 PM, Myrtle Beach Minute <david@myrtlebeachsc.com> wrote:

> Skip,
>
> Is this the Supreme Court FOIA case they won? If so, this is big news.
>
> Sincerely,
>
> David Hucks
> myrtlebeachSC
> MyrtleBeachSC News
> Myrtle Beach Daily News in 1 Minute Flat
> MyrtleBeachSC.com
> FIND YOUR NEWS ON FACEBOOK Facebook.com/SCMyrtleBeach

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

From: **CC Hoagland** skiphoagland@yahoo.com
Subject: Gregg Alford should be sued for malpractice
Date: December 14, 2017 at 4:24 PM America/New_York
To: davidb@hiltonheadislandsc.gov, KimL@hiltonheadislandsc.gov, Tom Lennox toml@hiltonheadislandsc.gov, WilliamH@hiltonheadislandsc.gov, David Ames amesco@earthlink.net, MarcG@hiltonheadislandsc.gov, JohnM@hiltonheadislandsc.gov
Cc: gregg@alfordlawsc.com, brianh@hiltonheadislandsc.gov, stever@hiltonheadislandsc.gov

Gregg Alford should be sued for malpractice and fired immediately.
Brian Hulbert as well.

His role in the use of tax payers money for private use is outrageous. He has violated his Town Lawyer contract representing an individual council person and profiting from this. He has be part of Violating the procurement process for the Town Lawyer legal services and being the lawyer for 14yrs collecting over 4 m in fees, denying other lawyers this opportunity, I can only assume many charges at maximum rates, all this approved by his crooked buddies Steve Riley and Brian Hulbert. My understanding Gregg Deloach is part of all this. His role in using tax money to join the chamber as a town member, attending the Chamber Ball to wine and dine on tax payers dime.100k app? Atax Committee appointees, Steve Riley chosen citizen of the year by the chamber?

Gregg Alford involvement with David Tigges and the corrupt chamber contract, past 4 m welcome center, much more. Lots of questions and answers needed from Gregg Alford, Brian Hulbert and Gregg Deloach. We must do a forensic audit of this Town ASAP.

John McCann , Tom Lennox and Bill Harkins lies and deceit.

The lawyers are helping to allow continued unconstitutional misuse of public Atax funds. They are both causing many lawsuits caused by their corruption and incompetence.

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

From: **Skip Hoagland** shoagland@me.com
Subject: Berkeley County SC School board/ fbi raid and CFO theft of 386k
Date: December 09, 2017 at 10:00 AM America/New_York
To: mcovert@bcgov.net, tvaux@bcgov.net, Rick Caporale rcaporale@bcgov.net, sturodman@aol.com, fran bisi eyelandart@yahoo.com, mark@marksanford.com, Tim Scott joe_mckeown@scott.senate.gov, jwiendl@sonesta.com, tecklenburgj@charleston-sc.gov, jrhodes@cityofmyrtlebeach.com, psommerville@bcgov.net
Cc: "Orischak, Josephine A" Josephine.Orischak@beaufort.k12.sc.us, REBECCA BASS muttleycrew2008@gmail.com, Jim Bequette jwbterp@aol.com, Marilyn Bullard bullardpiwko@aol.com, jerry at the beach gringoviejotwo@yahoo.com, Tony Cambria info@windrunnerstables.com, "mkeel@sled.sc.gov" mkeel@sled.sc.gov, "Meyerhofer, Kelly" kmeyerhofer@islandpacket.com, "Gwozdz, Christina S" Christina.Gwozdz@beaufort.k12.sc.us, "Flewelling, Brian" brianf@bcgov.net, "Kinton, Geraldine C" Geraldine.Kinton@beaufort.k12.sc.us, "shannonerickson@schouse.org" shannonerickson@schouse.org, "johncrangle2@gmail.com" johncrangle2@gmail.com, "Stewart, Jerry" jstewart@bcgov.net, "Dawson, Gerald" gdawson@bcgov.net, Rick Brundrett rbrundrett@islandpacket.com, "michaelrivers@schouse.gov" michaelrivers@schouse.gov, "Campbell, Earl" earl.campbell@beaufort.k12.sc.us, "ami@ethics.sc.gov" ami@ethics.sc.gov, "jdpc@hargray.com" jdpc@hargray.com, "tom@senatortomdavis.com" tom@senatortomdavis.com, "Dunkle, Joseph R" Joseph.Dunkle@beaufort.k12.sc.us, Liz Farrell efarrell@islandpacket.com, "Staton, Jennifer A" Jennifer.Staton@beaufort.k12.sc.us, "pgrant@sled.sc.gov" pgrant@sled.sc.gov, "tmbdab@aol.com" tmbdab@aol.com, "marksanford99@gmail.com" marksanford99@gmail.com, "Fobes, Steve" sfobes@bcgov.net, Joseph Iaco jiaco@bellsouth.net, "Rodman, Stewart" srodman@bcgov.net, "awilson@scag.gov" awilson@scag.gov, "Spiker149@hargray.com" Spiker149@hargray.com, "wnewton@jsplaw.net" wnewton@jsplaw.net, "cnrgbr@hargray.com" cnrgbr@hargray.com, "deann.komanecky@blufftontoday.com" deann.komanecky@blufftontoday.com, "zoomru@yahoo.com" zoomru@yahoo.com, "Gregory, Cynthia W" Cynthia.Gregory@beaufort.k12.sc.us, John Dowling dowlingjohn287@gmail.com, "rgregory@sled.sc.gov" rgregory@sled.sc.gov, "shamm@ethics.sc.gov" shamm@ethics.sc.gov, "jbagnall@ethics.sc.gov" jbagnall@ethics.sc.gov, "Cordray, Mary M" Mary.Cordray@beaufort.k12.sc.us, "jeffbradley@schouse.gov" jeffbradley@schouse.gov, "dwilliams@sled.sc.gov" dwilliams@sled.sc.gov, "mburchstead@ethics.sc.gov" mburchstead@ethics.sc.gov, "usn1066@gmail.com" usn1066@gmail.com, "lgibson@scag.gov" lgibson@scag.gov, "Crosby, Tonya V" Tonya.Crosby@beaufort.k12.sc.us, "aldenbauer706@gmail.com" aldenbauer706@gmail.com, "Cushingberry, Robyn L" Robyn.Cushingberry@beaufort.k12.sc.us, "contact@beaufortwatchdog.org" contact@beaufortwatchdog.org, "Payne, Wilbur M" Wilbur.Payne@beaufort.k12.sc.us, Auditor auditor@bcgov.net, "Striebinger, David R" David.Striebinger@beaufort.k12.sc.us, tdavis@harveyandbattey.com, "William G. Bill Herbkersman" schsdistrict118@aol.com, John Munro JMunro@seapines.com, Steve Birdwell sbirdwell@seapines.com, gerard mahieu gerardmahieu@aol.com, Marc Frey mfrey@freymedia.com, Sarah Borton Sarah Borton sgillis@islandpacket.com, Jay Bender jbender@brblegal.com, Dave Schwartz dave@scpolicycouncil.org, Jim Carpenter james.carpenter@carpenterlawfirm.net, Cynthia Bensch bensch@hargray.com, David Ames amesco@earthlink.net, Lee Bright Lee@brightagencyinc.com, Russ Keep hhlaw@hargray.com, joeborelli1@mac.com, Justin New Orleans Lawyer Justin New Orleans Lawyer jwinch@smithstag.com, Art Davis art@globallylocally.com, Jeremia Froyland jeremiafroyland@gmail.com, josh metnick josh@chicago.com, Fred Mercaldo fred@scottsdale.com, Austin Andrukaitis austinandrukaitis@gmail.com, John Keener john@charlestoncrabhouse.com, John Durst john@scrla.org, nancy watt wtghhi@aol.com, linda rew linda@hiltonhead.com, dan@media360.com, eric@laislamagazine.com, Ryan McAvoy mcavoylegend@gmail.com, Barrett Brewer BBrewer@clawsonandstaubes.com, gregg@alfordlawsc.com, Sarah Sanford sarahsanford@palmettobluffonline.com, sarah borton sborton@islandpacket.com, WilliamH@hiltonheadislandsc.gov, Will Folks will.folks@gmail.com, david@myrtlebeachsc.com, davidb@hiltonheadislandsc.gov, Tom Lennox toml@hiltonheadislandsc.gov, Billy Keyserling billyk@islc.net, edukes@lcre.com, edumain@mcclatchydc.com, Andrew Knittle aknittle@postandcourier.com, Glenn Smith gsmith@postandcourier.com, John Barnwell jbarnwell@postandcourier.com, dpascoe@scsolicitor1.org, Roberts Vaux roberts.vaux@vmblawfirm.com

So Mr Covert, Mr Vaux and Mr Caporale you don't think we need a forensic audit of Jeff Moss? Would you agree only two answers why after reading both these links, you all are either corrupted or totally incompetent and not fit to serve in any capacity that requires transparency and accountability to the public tax dollars.

https://www.postandcourier.com/news/conservative-berkeley-school-board-faced-overcame-many-challenges-in/article_04ea0934-dc4a-11e7-9220-dbd6192921e8.html

https://www.yankeeinstitute.org/wp-content/uploads/2015/07/Ending-Corruption-and-Waste-In-Your-Public-School.pdf

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Sep 2, 2017, at 5:38 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> Tabor / Rick / Mike / Stu, are you all serious or is this a joke and fake news report? I know Lucas High, he is a good honest reporter. So this must be true. Anyone who does not believe Jeff Moss, Bill Miles and all our Town governments including Steve Riley, Gary Kubic and Marc Orlando does not need forensic audits after 100yrs, and in light of corruption swirling around, the current Berkeley country SC FBI raid, must be incompetent. Fact Jeff Moss lied and he hired the cookie cutter audit under great suspicion. Fact, you lie once you will lie twice and much more. All 4 of you have to be either corrupted, never read the Reagan principal or just plan incompetent. Something is bad wrong and more reason for a forensic audit and law enforcement involvement. Our town officials are so corrupted, we need outside emergency help. We are in severe corrupted crisis. Mr Covert, to my knowledge is the only one out of these men who have a clue on how to run and build a local company. How could myself or others trust you in business, or buy air conditioning from you if you can't keep you campaign promises and force transparency? Mike wake up, you will sell more air conditioning units as a champion of tax payers, than you will as a influenced corrupted crook or in fear to not speak up and act and committing fraud not living up to your campaign promises. This is not the way to build your local business

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

should all recall the role (complicity?) of auditing firms in the financial meltdown. A few of whom are no longer in business. Have we forgotten so soon? The attached document ("Are Audits Worthless") is worth a quick read.

RC

From: fran bisi [eyelandart@yahoo.com]
Sent: Thursday, July 27, 2017 4:19 PM
To: Orischak, Josephine A; REBECCA BASS
Cc: Jim Bequette; Marilyn Bullard; jerry at the beach; Tony Cambria; mkeel@sled.sc.gov; Meyerhofer, Kelly; Gwozdz, Christina S; Flewelling, Brian; Kinton, Geraldine C; shannonerickson@schouse.org; johncrangle2@gmail.com; Stewart, Jerry; Dawson, Gerald; Rick Brundrett; skiphoagland@yahoo.com; michaelrivers@schouse.gov; Campbell, Earl; ami@ethics.sc.gov; jdpc@hargray.com; joe_mckeown@scott.senate.gov; tom@senatort Dunkle, Joseph R; taylor@harrisonfirm.com; Liz Farrell; Staton, Jennifer A; pgrant@sled.sc.gov; tmbdab@aol.com; marksanford99@gmail.com; Fobes, Steve; Joseph Iaco; Caporale, Rick; Rodman, Stewart; awilson@scag.gov; Spiker149@hargray.com; wnewton@jsplaw.net; cnrgbr@hargray Gregory, Cynthia W; John Dowling; rgregory@sled.sc.gov; shamm@ethics.sc.gov; jbagnall@ethics.sc.gov; Cordray, Mary M; jeffbradley@schouse.gov; dwilliams@sled.sc.gov; mburchstead@ethics.sc.gov; usn1066@ Crosby, Tonya V; aldenbauer706@gmail.com; Cushingberry, Robyn L; contact@beaufortwatchdog.org; Payne, Wilbur M; Auditor; Striebinger, David R; Covert, Michael
Subject: Re: Moss Letter to editor July 26,2017 @5:13

If I'm correct they "selected 40 transactions" for Fiscal Year 2016. They were "examined for compliance with the District's procurement policy and not exceptions were noted." Whatever that means, I'm not impressed. That's less than a day's worth of transactions.

Example: on Jan 5th and 6th of 2016 there were 37 transactions and that's not counting those under $100.

Is this what he calls an audit?

fran

On Thursday, July 27, 2017 1:53 PM, "Orischak, Josephine A" <Josephine.Orischak@beaufort.k12.sc.us> wrote:

All,

FYI: Here is a link to the BCSD website for Procurement Audits performed from 2013 to the present. Open the 'Other Financial Reports' folder to view.

http://beaufortschools.net/cms/one.aspx?portalId=170925&pageId=296554

JoAnn Orischak
Beaufort County Board of Education
District 11

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Sent from my iPad

On Jul 27, 2017, at 9:36 AM,
"REBECCA BASS"
<muttleycrew2008@gmail.com<mailto:muttleycrew2008@gmail.com>>
wrote:

In his letter, Moss does say "they are reviewed each year by a pair of separate independent audits". We should request copies of these audits and ask who conducted them.

Rebecca

On Thu, Jul 27, 2017 at 9:25 AM, Jim Bequette
<jwbterp@aol.com<mailto:jwbterp@aol.com>>
wrote:

I am attaching a letter written by the Superintendent which was printed in last night's internet edition of the Packet/Gazette. Moss asserts that letter writers have asserted that "Beaufort County School District employees have misused tax dollars" using district credit cards. He then states "nothing could be further from the truth".

Why does he not promote having a forensic audit to assure us taxpayers that his statement is factual? Why aren't we given all the facts on the admitted 47 fraudulent charges on those card?. Who did the two separate independent "reviews" of P-card that he cites in this letter? Note he doesn't say audits. I will submit an FOIA request for the "reviews".

I read the county government spends about $1 million a year on credit cards while the School District is up about $25 million. The county budget is smaller than 1/2 of the school's.

Many, many charges on those P-cards as reported by Fran Bisi look very questionable. Superintendent Moss can only quiet down the public uproar by immediately having the Board approve a forensic audit. How can you take his statements as fact after he was already found in two ethics violations?

Last I would like to commend Fran Bisi for her great work in exposing what could be a monumental problem. However if Moss and the Board do not approve a forensic audit, the citizens will never know the truth or trust them.

Jim Bequette Retired CPA in Md, WV, and SC

—
Rebecca W. Bass
Broker in Charge
SeaBass Properties Real Estate
Licensed in South Carolina and Georgia
843-263-3772

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

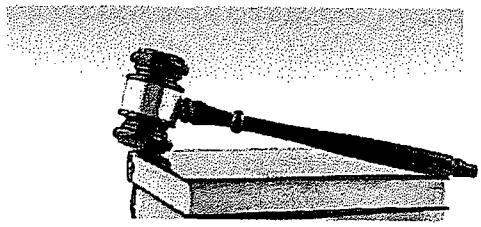
On Aug 27, 2017, at 1:33 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> Read link below, oh my God new audit firm for Berkeley county Schools the FBI just discovered 400k in theft on, Berkeley school board just hired the same firm Jeff moss and ten others hired ? No procurement? No clue this firm like their last firm that missed the 400k theft, is under suspicion of missing theft/ misuse by Jeff Moss.
> Folks we are in big trouble !
>
> Again the full time employees and lawyers have seized total control from the few honest and mostly corrupted Part time board members. I know of no successful company where the employees tell the owners what to do and worse refuse the owners access to see the books ? This is simply massive insanity and an extremely broken and failed system. Only one act will work under this Broken system, a Forencic audit and FBI / IRS investigation. No one in SC can be trusted no one. Reagan theory only!
>
> It is very sad to watch so many good people fight so hard to try and win against all this corruption without an audit. There is zero chance of victory without it. Moss and his full time lawyer, along with those they have corrupted on the board, will never be stopped without being forced to audit. Then the question becomes who gets hired to do the forensic audit that can be trusted in SC. This will need to be out of state or better all overseen and done in alliance with the FBI investigation like Berkeley SC.
>
> My God again our investigative team just discovered Berkeley county just hired a new audit firm and same firm Jeff Moss hired. This firm once audited like Palm beach and the last audit firm will also turn out to have missed massive corruption by Jeff Moss. The question is, and FBI needs to act, will this firm and its auditors be tied to the corruption and embezzlement ? Houston we have a problem ? How is it possible FBI catches this theft and now the Jeff moss hired audit firm is hired by the Berkeley school board ?
>
> https://www.berkeleyind.com/news/school-board-agrees-on-new-auditor/article_ddb0077e-35c8-11e7-acac-2f2854e94e89.html
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

On Aug 27, 2017, at 10:38 AM, Orischak, Josephine A <Josephine.Orischak@beaufort.k12.sc.us> wrote:

> Jerry,
>
> Regarding our new meeting structure, Joseph Dunkle's reservations about it not providing adequate time to discuss topics are most relevant. Look at it this way: the board previously had six committees, four of which met monthly/regularly for (approximately) 2 hours each. That's **8 hours** worth of discussion of **important issues** that was taking place each month. This estimate doesn't even include the two committees (HR and Legislative) that met periodically, as well.
>
> We've now cut that monthly discussion time literally in half down to **4 hours**.
>
> While we all appreciate the notion of reducing meeting costs, I am not sure how valid this argument is now that we know the potential costs of upgrading central office's video recording capabilities.
>
> In summary, the Board (in whole or part) will only be publicly gathered twice monthly now. As such, my greatest concern remains that the Board will be asked to vote/take action with considerably less time to discuss/vet important issues.
>
> JoAnn Orischak
> District 11
>
> Sent from my iPad
>
> On Aug 27, 2017, at 8:13 AM, "jerry at the beach" <gringoviejotwo@yahoo.com> wrote:

More money? Less transparency? The effects of Beaufort County school



More money? Less transparency? The effects of Beaufort County school boa...

Changes to Beaufort County Board of Education meetings in South Carolina could cost the district more money and,...

Board member Kinton said: *"Eliminating committee meetings will save the district money, argued Kinton, who spearheaded the overhaul of the meeting format."*

When Candidate Kinton was asked; What specific steps will you take to make government more open and accessible to the public?

Candidate Kinton said: *"I believe the school board should govern by committees that include community members. Committees should be charged with researching topics, hearing recommendations from administration, challenging administration recommendations when appropriate and making final recommendations to the full school board. Board committees will provide more opportunities for parents, citizens and stakeholders to become engaged, informed and involved in the process of educating our children."*

Oh, my! Read it again folks, and if you don't believe me, here is the link.
http://www.islandpacket.com/news/politics-government/election/article33484737.html#storylink=cpy

G.A. Smith
Well represented in Dist. 11

Sent from my iPhone excuse all typos and misspellings

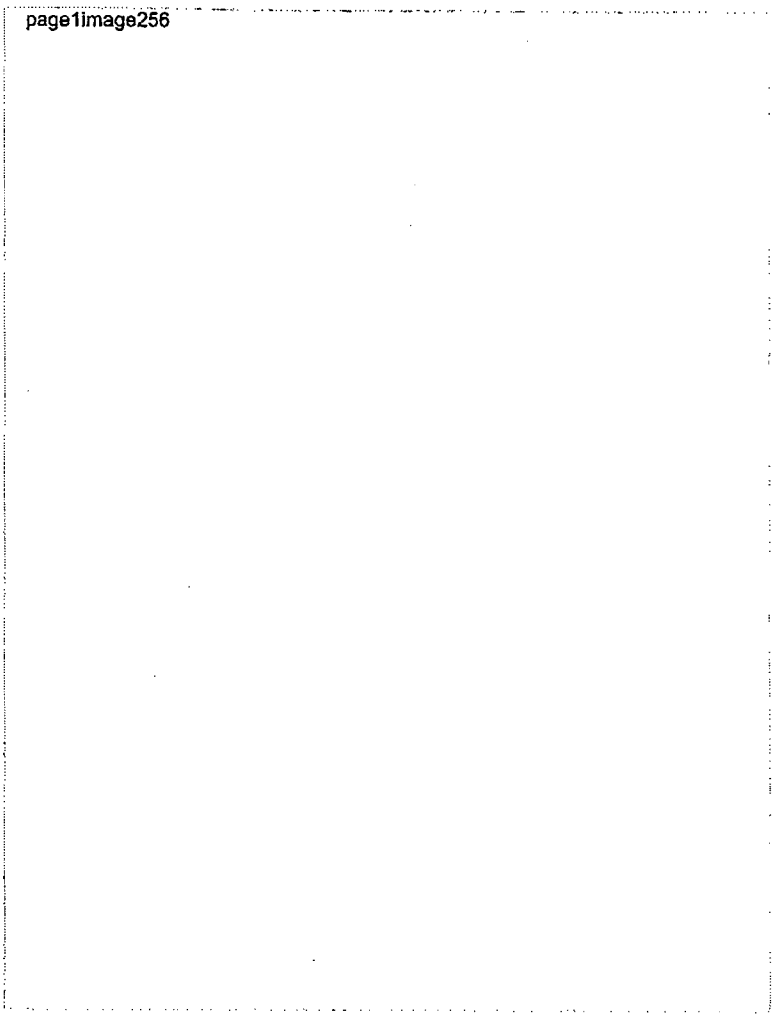
Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 31, 2017, at 7:32 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> It's time to get serious and do what's right . The corruption, lack of transparency, accountability, proven performance metrics, lies, secrecy and denial must end. If our County officials will not act, then we need to get state and federal authorities to force them. This crisis must end !!!
> It's time to now file a lawsuit. Please everyone send me your ideas for this. Beaufort Watch Dog will pay all cost !

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937



Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 28, 2017, at 4:20 AM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> I will address the "audit" for those not copied on my last email. A financial audit performed by an independent accounting firm is addressing the financial condition at a given point in time. Their primary focus is to determine if the income statement and balance sheet is a fair reflection of the financial condition and performance**when taken as a whole**. If you read the supplemental opinion, that is what the accountant is saying. He is not giving an opinion as to the proper allocations of income and expenses. Therefore, in order to establish the true income and expense from each activity you must see a detailed general ledger and other documents and records to make our own determination as to the true allocation of income and expenses and thus the unrelated business income. The schedules attached to these financial statements reflect exactly -0- for the net income from each activity other than members services. As any reasonable person would know, this is not possible.
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

On Jul 28, 2017, at 4:00 AM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> I would like to address the UBI issue from the earlier emails. Most of the 90 or so whistleblower filings I have filed on Cvbs Chambers city Dmos report no or very little UBI. This is because they offset the income with the cost to produce this income. They are incurring labor cost to develop the webpage for the local chamber and CVB which promotes the city while also producing advertisements for businesses willing to pay them to be listed. These same employees are utilized to develop the site to book hotel rooms and flights etc. Their 990s frequently show exactly -0- for UBI. Others show losses while a few show some small profits. (Only a couple reflect any significant UBI) If a CVB shows a loss, then it means that membership dues or government funding subsidized these efforts. The problem remains that almost none of them make any effort to split our their labor and other costs to produce the UBI. Therefore we do not know how much they are truly making or even what their gross revenue is from these activities. If for example they received $10M from advertisers and from booking revenues and only $5M from membership dues and state and federal grants, they might show -0- unrelated business income due to how they allocate expenses. The CVB's and Chambers will spend all they get as there is no profit motive.
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

On Jul 27, 2017, at 6:37 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> > Cookie cutter audits are not meant to catch crimes. This is why our state is in trouble. Never in the 100 year history
> > has any School districts, chambers and towns been forensically audited.
> > Berkeley county SC first one on Sc. Those in other states that have refused forencic audits and then forced or investigated by the FBI IRS investigations have mostly resulted in prison. Here is your answer. Palm beach type audits
> >
> > Sent from my iPhone excuse all typos and misspellings
> >
> > Skip Hoagland
> > US cell 843-384-7260
> > Buenos Aires , Argentina
> > 011-54-9-11-5942-3202

On Jul 27, 2017, at 5:59 PM, fran bisi <eyelandart@yahoo.com> wrote:

> > > I think what you have attached isn't referring to a forensic audit, but a CAFR that Moss was referring to...AKA Cookie Cutter.
> > >
> > > ***fran***
> > >
> > > On Thursday, July 27, 2017 5:22 PM, "Caporale, Rick" <rcaporale@bcgov.net> wrote:
> > >
> > > Fran:

When we think or talk about audits, we

A few of whom are no longer in business. Have we forgotten so soon? The attached document ("Are Audits Worthless") is worth a quick read.

RC

From: fran bisi [eyelandart@yahoo.com]
Sent: Thursday, July 27, 2017 4:19 PM
To: Orischak, Josephine A; REBECCA BASS
Cc: Jim Bequette; Marilyn Bullard; jerry at the beach; Tony Cambria; mkeel@sled.sc.gov; Meyerhofer, Kelly; Gwozdz, Christina S; Flewelling, Brian; Kinton, Geraldine C; shannonerickson@schouse.org; johncrangle2@gmail.com; Stewart, Jerry; Dawson, Gerald; Rick Brundrett; skiphoagland@yahoo.com; michaelrivers@schouse.gov; Campbell, Earl; ami@ethics.sc.gov; jdpc@hargray.com; joe_mckeown@scott.senate.gov; tom@senatortomdavis.com; Dunkle, Joseph R; taylor@harrisonfirm.com; Liz Farrell; Staton, Jennifer A; pgrant@sled.sc.gov; tmbdab@aol.com; marksanford99@gmail.com; Fobes, Steve; Joseph Iaco; Caporale, Rick; Rodman, Stewart; awilson@scag.gov; Spiker149@hargray.com; wnewton@jsplaw.net; cnrgbr@hargray.com; deann.komanecky@blufftontoday.com; zoomru@yahoo.com; Gregory, Cynthia W; John Dowling; rgregory@sled.sc.gov; shamm@ethics.sc.gov; jbagnall@ethics.sc.gov; Cordray, Mary M; jeffbradley@schouse.gov; dwilliams@sled.sc.gov; mburchstead@ethics.sc.gov; usn1066@gmail.com; tgibson@scag.gov; Crosby, Tonya V; aldenbauer706@gmail.com; Cushingberry, Robyn L; contact@beaufortwatchdog.org; Payne, Wilbur M; Auditor; Striebinger, David R; Covert, Michael
Subject: Re: Moss Letter to editor July 26,2017 @5:13

If I'm correct they "selected 40 transactions" for Fiscal Year 2016. They were "examined for compliance with the District's procurement policy and not exceptions were noted." Whatever that means, I'm not impressed.
That's less than a day's worth of transactions.

Example: on Jan 5th and 6th of 2016 there were 37 transactions and that's not counting those under $100.

Is this what he calls an audit?

fran

On Thursday, July 27, 2017 1:53 PM, "Orischak, Josephine A" <Josephine.Orischak@beaufort.k12.sc.us> wrote:

All,

FYI: Here is a link to the BCSD website

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Financial Reports' folder to view.

http://beaufortschools.net/cms/one.aspx?portalId=170925&pageId=296554

JoAnn Orischak
Beaufort County Board of Education
District 11
Hilton Head Island
C. (843) 338-1737

Sent from my iPad

On Jul 27, 2017, at 9:36 AM, "REBECCA BASS" <muttleycrew2008@gmail.com<mailto:muttleycrew2008@gmail.com>> wrote:

In his letter, Moss does say "they are reviewed each year by a pair of separate independent audits". We should request copies of these audits and ask who conducted them.

Rebecca

On Thu, Jul 27, 2017 at 9:25 AM, Jim Bequette <jwbterp@aol.com<mailto:jwbterp@aol.com>> wrote:

I am attaching a letter written by the Superintendent which was printed in last night's internet edition of the Packet/Gazette. Moss asserts that letter writers have asserted that "Beaufort County School District employees have misused tax dollars" using district credit cards. He then states "nothing could be further from the truth".

Why does he not promote having a forensic audit to assure us taxpayers that his statement is factual? Why aren't we given all the facts on the admitted 47 fraudulent charges on those card?. Who did the two separate independent "reviews" of P-card that he cites in this letter? Note he doesn't say audits. I will submit an FOIA request for the "reviews".

I read the county government spends about $1 million a year on credit cards while the School District is up about $25 million. The county budget is smaller than 1/2 of the school's.

Many, many charges on those P-cards as reported by Fran Bisi look very questionable. Superintendent Moss can only quiet down the public uproar by immediately having the Board approve a forensic audit. How can you take his statements as fact after he was already found in two ethics violations?

Last I would like to commend Fran Bisi for her great work in exposing what could be a monumental problem. However if Moss and the Board do not approve a forensic audit, the citizens will never know the truth or trust them.

Jim Bequette Retired CPA in Md, WV, and SC

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

SeaBass Properties Real Estate
Licensed in South Carolina and Georgia
843-263-3772

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

From: **Skip Hoagland** shoagland@me.com

Subject: Re: Island Packet/ State newspaper Sara Borton retired or fired ? Hoagland Lawsuit just filed attached — against Part Time Mayor / Full Time Realestate Agent Lisa Sulka for First Amendment Violations. Add lying, deceiving, unconstitutional misuse of town employees and tax monies to profit a private corporation and harming another private corporation, schemed with Town manager Marc Orlando with Knowledge of Town Lawyer Terry Finger.

Date: December 06, 2017 at 9:13 PM America/New_York

To: Art Davis art@globallylocally.com, sarah borton sborton@islandpacket.com, chris hendricks chendricks@mcclatchy.com

Cc: Weston Newton wnewton@jsplaw.net, mcovert@bcgov.net, tdavis@harveyandbattey.com, "William G. Bill Herbkersman" schsdistrict118@aol.com, jeffbradley@schouse.gov, tvaux@bcgov.net, Rick Caporale rcaporale@bcgov.net, sturodman@aol.com, fran bisi eyelandart@yahoo.com, mark@marksanford.com, Tim Scott joe_mckeown@scott.senate.gov, jwiendl@sonesta.com, tecklenburgj@charleston-sc.gov, jrhodes@cityofmyrtlebeach.com, psommerville@bcgov.net, Jerry Stewart jstewart@bcgov.net, jgruber@bcgov.net, gkublc@bcgov.net, Terry Finger tfinger@fingerlaw.com, morlando@townofbluffton.com, davidb@hiltonheadislandsc.gov, Tom Lennox toml@hiltonheadislandsc.gov, JohnM@hiltonheadislandsc.gov, David Ames amesco@earthlink.net, Dan Wood dwood@townofbluffton.com, Fred Hamilton fhamilton@townofbluffton.com, Harry Lutz hlutz@townofbluffton.com, Larry Toomers ltoomer@townofbluffton.com, Scott Marshall smarshall@townofbluffton.com, Ted Huffman tkhuffman1@gmail.com, Cynthia Bensch bensch@hargray.com, Roberts Vaux roberts.vaux@vmblawfirm.com, Lucas High lhigh@islandpacket.com, Brian Tolley btolley@islandpacket.com, "Thenerve.org Rick" rbrundrett@islandpacket.com, "Orischak, Josephine A" Josephine.Orischak@beaufort.k12.sc.us, REBECCA BASS muttleycrew2008@gmail.com, Jim Bequette jwbterp@aol.com, Marilyn Bullard bullardpiwko@aol.com, jerry at the beach gringoviejotwo@yahoo.com, Tony Cambria info@windrunnerstables.com, "mkeel@sled.sc.gov" mkeel@sled.sc.gov, "Meyerhofer, Kelly" kmeyerhofer@islandpacket.com, "Gwozdz, Christina S" Christina.Gwozdz@beaufort.k12.sc.us, "Flewelling, Brian" brianf@bcgov.net, "Kinton, Geraldine C" Geraldine.Kinton@beaufort.k12.sc.us, "shannonerickson@schouse.org" shannonerickson@schouse.org, "johncrangle2@gmail.com" johncrangle2@gmail.com, "Dawson, Gerald" gdawson@bcgov.net, "michaelrivers@schouse.gov" michaelrivers@schouse.gov, "Campbell, Earl" earl.campbell@beaufort.k12.sc.us, "ami@ethics.sc.gov" ami@ethics.sc.gov, "jdpc@hargray.com" jdpc@hargray.com, "tom@senatortomdavis.com" tom@senatortomdavis.com, "Dunkle, Joseph R" Joseph.Dunkle@beaufort.k12.sc.us, Liz Farrell efarrell@islandpacket.com, "Staton, Jennifer A" Jennifer.Staton@beaufort.k12.sc.us, "pgrant@sled.sc.gov" pgrant@sled.sc.gov, "tmbdab@aol.com" tmbdab@aol.com, "marksanford99@gmail.com" marksanford99@gmail.com, "Fobes, Steve" sfobes@bcgov.net, Joseph Iaco jiaco@bellsouth.net, "Rodman, Stewart" srodman@bcgov.net, "awilson@scag.gov" awilson@scag.gov, "Spiker149@hargray.com" Spiker149@hargray.com, "cnrgbr@hargray.com" cnrgbr@hargray.com, "deann.komanecky@blufftontoday.com" deann.komanecky@blufftontoday.com, "zoomru@yahoo.com" zoomru@yahoo.com, "Gregory, Cynthia W" Cynthia.Gregory@beaufort.k12.sc.us, John Dowling dowlingjohn287@gmail.com, "rgregory@sled.sc.gov" rgregory@sled.sc.gov, "shamm@ethics.sc.gov" shamm@ethics.sc.gov, "jbagnall@ethics.sc.gov" jbagnall@ethics.sc.gov, "Cordray, Mary M" Mary.Cordray@beaufort.k12.sc.us, "dwilliams@sled.sc.gov" dwilliams@sled.sc.gov, "mburchstead@ethics.sc.gov" mburchstead@ethics.sc.gov, "usn1066@gmail.com" usn1066@gmail.com, "lgibson@scag.gov" lgibson@scag.gov, "Crosby, Tonya V" Tonya.Crosby@beaufort.k12.sc.us, "aldenbauer706@gmail.com" aldenbauer706@gmail.com, "Cushingberry, Robyn L" Robyn.Cushingberry@beaufort.k12.sc.us, "contact@beaufortwatchdog.org" contact@beaufortwatchdog.org, "Payne, Wilbur M" Wilbur.Payne@beaufort.k12.sc.us, Auditor auditor@bcgov.net, "Striebinger, David R" David.Striebinger@beaufort.k12.sc.us, John Munro JMunro@seapines.com, Steve Birdwell sbirdwell@seapines.com, gerard mahieu gerardmahieu@aol.com, Marc Frey mfrey@freymedia.com, Sarah Borton Sarah Borton sgillis@islandpacket.com, Jay Bender jbender@brblegal.com, Dave Schwartz dave@scpolicycouncil.org, Jim Carpenter james.carpenter@carpenterlawfirm.net, Lee Bright Lee@brightagencyinc.com, Russ Keep hhlaw@hargray.com, joeborelli1@mac.com, Justin New Orleans Lawyer Justin New Orleans Lawyer jwinch@smithstag.com, Jeremia Froyland jeremiafroyland@gmail.com, josh metnick josh@chicago.com, Fred Mercaldo fred@scottsdale.com, Austin Andrukaitis austinandrukaitis@gmail.com, John Keener john@charlestoncrabhouse.com, John Durst john@scrla.org, nancy watt wtghhi@aol.com, linda rew linda@hiltonhead.com, dan@media360.com, eric@laislamagazine.com, Ryan McAvoy mcavoylegend@gmail.com, Barrett Brewer BBrewer@clawsonandstaubes.com, gregg@alfordlawsc.com, Sarah Sanford sarahsanford@palmettobluffonline.com, sarah borton sborton@islandpacket.com, Will Folks will.folks@gmail.com, david@myrtlebeachsc.com, Alex Kinkaid akincaid@islandpacket.com, Andrew Knittle aknittle@postandcourier.com, Glenn Smith gsmith@postandcourier.com, dpascoe@scsolicitor1.org, WilliamH@hiltonheadislandsc.gov, Bill Geist bill@dmoproz.com, jrosen@rrhlawfirm.com, djennings@rrhlawfirm.com

Art, your full support is much appreciated!
We have filed many lawsuits as you know and came to realize this is the only way to clean up corruption in SC, all talk and no action goes nowhere. We have now gotten rid of the publisher of our local newspaper who harmed this island for 25 yrs with her censorship of local news in favor of her biggest advertisers and corrupt friends of her and her husband. This investigation is still ongoing and want to depose both her and her husband as our lawsuits keep going to clean up all the corruption and unconstitutional use of our tax monies by many crooks and liars.
I have attached very important links for you and everyone on the only way to restore transparency, accountability and performance metrics to SC. Please just read the short intro on both links by Dr Armand Fusco and auditor of Palm Beach who performed the forensic audit on the Cvb city Dmo. Also attached, the current ongoing raid on the Berkeley County chamber and 386k theft by the School system CFO. This is the beginning of the end for many corrupt institutions in SC. Imagine this was the first raid by the FBI and forensic audits forced on SC institutions in 100 yrs and both resulted in crimes. Never in the history of the entire USA has a forensic audit been done on these type institutions and even local city government Town managers and town lawyers where wrong doing was not discovered and prison the result in many cases. I am calling for the creation of totally independent FACS (Forensic Audit Committees) and IAC (Independent Audit Committees) to be set up in every city in SC. These committees are formed with retired and volunteer CPA with full knowledge of accounting and proper audit procedures.

Read these links, it will take 10 mins to read all. Once we do this, we will restore civil behavior to our state and save millions in tax monies and put millions back into the coffers of our federal IRS system. Thanks again for having the courage to respond and support my extremely controversial fight. Also attached is info on my lawsuit against the Beaufort Chamber for violations to the SC non profit corporation act laws refusing its own members access to the financials. Our Foia lawsuit against the extremely crooked Hilton Head Chamber for refusing access to the financials to tax payers on how it uses and

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Violations are in the hundreds of millions, our country needs this money to pay for our military, roads, bridges and must stop this nationwide fraudulent scams.

I have cced / bced many law enforcement agencies both state and federal and bced those who need to be protected. I have also cced the presidents of these national Chambers and Dmo Cvb associations, whom I have informed and their lawyers as frauds and part of these scams to violate our country and non profit 501-c6 tax codes and IRS Ubit laws. I have filed IRS Whistle blower cases against many crooks over 70 who operate the largest city CVBS Dmos and some Chambers in the USA and the 3 largest crooks in SC who operate the Hilton Head co-mingled Chamber Cvb city Dmo, Charleston Cvb and Dmo and Myrtle Beach co-mingled Chamber Cvb city Dmo. These organizations are robbing us of millions with zero oversight, no audits, no performance metrics and many like Berkeley SC chamber and Palm Beach Cvb discovered committing crimes such as embezzlement, fraud and theft to our tax funds.

https://www.yankeeinstitute.org/wp-content/uploads/2015/07/Ending-Corruption-and-Waste-In-Your-Public-School.pdf

https://www.mypalmbeachclerk.com/uploadedFiles/Public_Funds/cvb_audit_report.pdf

http://abcnews4.com/news/crime-news/fbi-investigating-berkeley-county-chamber-of-commerce

https://www.postandcourier.com/news/former-cfo-of-berkeley-schools-confesses-to-taking-from-the/article_01d5ebf2-f2f1-11e6-95e7-135411516e67.html

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Dec 6, 2017, at 2:38 PM, Art Davis <art@globallylocally.com> wrote:

> Good to see this moving ahead.
>
> Art
>
> **Attachments:**
> Return to Motion to Dimiss - filed.pdf (148.48 kB)
>
> From:
> [redacted]
> Gregg Alford gregg@alfordlawsc.com
> Subject:
> Fwd: Island Packet/ State newspaper Sara Borton retired or fired ? Hoagland Lawsuit just filed attached — against Part Time Mayor / Full Time Realestate Agent Lisa Sulka for First Amendment Violations. Add lying, deceiving, unconstitutional misuse of town employees and tax monies to profit a private corporation and harming another private corporation, schemed with Town manager Marc Orlando with Knowledge of Town Lawyer Terry Finger.
> Date:
> December 29, 2017 at 2:13 PM America/New_York
> To:
> Vicki Allison Vicki@alfordlawsc.com
>
> ---------- Forwarded message ----------
> From: **Skip Hoagland** <shoagland@me.com>
> Date: Wed, Dec 6, 2017 at 9:13 PM
> Subject: Re: Island Packet/ State newspaper Sara Borton retired or fired ? Hoagland Lawsuit just filed attached — against Part Time Mayor / Full Time Realestate Agent Lisa Sulka for First Amendment Violations. Add lying, deceiving, unconstitutional misuse of town employees and tax monies to profit a private corporation and harming another private corporation, schemed with Town manager Marc Orlando with Knowledge of Town Lawyer Terry Finger.
> To: Art Davis <art@globallylocally.com>, sarah borton <sborton@islandpacket.com>, chris hendricks <chendricks@mcclatchy.com>
> Cc: Weston Newton <wnewton@jsplaw.net>, mcovert@b[redacted].net, tdavis@harveyandbattey.com, "William G. Bill Herbkersman" <schsdistrict118@aol.com>, jeffbradley@schouse.gov, tvaux@hcgov.net, Rick Caporale

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

jrhodes@cityofmyrtlebeach.com, psommerville@bcgov.net, Jerry Stewart <jstewart@bcgov.net>, jgruber@bcgov.net, gkubic@bcgov.net, Terry Finger <tfinger@fingerlaw.com>, morlando@townofbluffton.com, davidb@hiltonheadislandsc.gov, Tom Lennox <tomi@hiltonheadislandsc.gov>, JohnM@hiltonheadislandsc.gov, David Ames <amesco@earthlink.net>, Dan Wood <dwood@townofbluffton.com>, Fred Hamilton <fhamilton@townofbluffton.com>, Harry Lutz <hlutz@townofbluffton.com>, Larry Toomers <ltoomer@townofbluffton.com>, Scott Marshall <smarshall@townofbluffton.com>, Ted Huffman <tkhuffman1@gmail.com>, Cynthia Bensch <bensch@hargray.com>, Roberts Vaux <roberts.vaux@vmblawfirm.com>, Lucas High <lhigh@islandpacket.com>, Brian Tolley <btolley@islandpacket.com>, "Thenerve.org Rick" <rbrundrett@islandpacket.com>, "Orischak, Josephine A" <Josephine.Orischak@beaufort.k12.sc.us>, REBECCA BASS <muttleycrew2008@gmail.com>, Jim Bequette <jwbterp@aol.com>, Marilyn Bullard <bullardpiwko@aol.com>, jerry at the beach <gringoviejotwo@yahoo.com>, Tony Cambria <info@windrunnerstables.com>, "mkeel@sled.sc.gov" <mkeel@sled.sc.gov>, "Meyerhofer, Kelly" <kmeyerhofer@islandpacket.com>, "Gwozdz, Christina S" <Christina.Gwozdz@beaufort.k12.sc.us>, "Flewelling, Brian" <brianf@bcgov.net>, "Kinton, Geraldine C" <Geraldine.Kinton@beaufort.k12.sc.us>, "shannonerickson@schouse.org" <shannonerickson@schouse.org>, "johncrangle2@gmail.com" <johncrangle2@gmail.com>, "Dawson, Gerald" <gdawson@bcgov.net>, "michaelrivers@schouse.gov" <michaelrivers@schouse.gov>, "Campbell, Earl" <earl.campbell@beaufort.k12.sc.us>, "ami@ethics.sc.gov" <ami@ethics.sc.gov>, "jdpc@hargray.com" <jdpc@hargray.com>, "tom@senatortomdavis.com" <tom@senatortomdavis.com>, "Dunkle, Joseph R" <Joseph.Dunkle@beaufort.k12.sc.us>, Liz Farrell <efarrell@islandpacket.com>, "Staton, Jennifer A" <Jennifer.Staton@beaufort.k12.sc.us>, "pgrant@sled.sc.gov" <pgrant@sled.sc.gov>, "tmbdab@aol.com" <tmbdab@aol.com>, "marksanford99@gmail.com" <marksanford99@gmail.com>, "Fobes, Steve" <sfobes@bcgov.net>, Joseph Iaco <jiaco@bellsouth.net>, "Rodman, Stewart" <srodman@bcgov.net>, "awilson@scag.gov" <awilson@scag.gov>, "Spiker149@hargray.com" <Spiker149@hargray.com>, "cnrgbr@hargray.com" <cnrgbr@hargray.com>, "deann.komanecky@blufftontoday.com" <deann.komanecky@blufftontoday.com>, "zoomru@yahoo.com" <zoomru@yahoo.com>, "Gregory, Cynthia W" <Cynthia.Gregory@beaufort.k12.sc.us>, John Dowling <dowlingjohn287@gmail.com>, "rgregory@sled.sc.gov" <rgregory@sled.sc.gov>, "shamm@ethics.sc.gov" <shamm@ethics.sc.gov>, "jbagnall@ethics.sc.gov" <jbagnall@ethics.sc.gov>, "Cordray, Mary M" <Mary.Cordray@beaufort.k12.sc.us>, "dwilliams@sled.sc.gov" <dwilliams@sled.sc.gov>, "mburchstead@ethics.sc.gov" <mburchstead@ethics.sc.gov>, "usn1066@gmail.com" <usn1066@gmail.com>, "lgibson@scag.gov" <lgibson@scag.gov>, "Crosby, Tonya V" <Tonya.Crosby@beaufort.k12.sc.us>, "aldenbauer706@gmail.com" <aldenbauer706@gmail.com>, "Cushingberry, Robyn L" <Robyn.Cushingberry@beaufort.k12.sc.us>, "contact@beaufortwatchdog.org" <contact@beaufortwatchdog.org>, "Payne, Wilbur M" <Wilbur.Payne@beaufort.k12.sc.us>, Auditor <auditor@bcgov.net>, "Striebinger, David R" <David.Striebinger@beaufort.k12.sc.us>, John Munro <JMunro@seapines.com>, Steve Birdwell <sbirdwell@seapines.com>, gerard mahieu <gerardmahieu@aol.com>, Marc Frey <mfrey@freymedia.com>, Sarah Borton Sarah Borton <sgillis@islandpacket.com>, Jay Bender <jbender@brblegal.com>, Dave Schwartz <dave@scpolicycouncil.org>, Jim Carpenter <james.carpenter@carpenterlawfirm.net>, Lee Bright <Lee@brightagencyinc.com>, Russ Keep <hhlaw@hargray.com>, joeborelli1@mac.com, Justin New Orleans Lawyer Justin New Orleans Lawyer <jwinch@smithstag.com>, Jeremia Froyland <jeremiafroyland@gmail.com>, josh metnick <josh@chicago.com>, Fred Mercaldo <fred@scottsdale.com>, Austin Andrukaitis <austinandrukaitis@gmail.com>, John Keener <john@charlestoncrabhouse.com>, John Durst <john@scrla.org>, nancy watt <wtghhi@aol.com>, linda rew <linda@hiltonhead.com>, dan@media360.com, eric@laislamagazine.com, Ryan McAvoy <mcavoylegend@gmail.com>, Barrett Brewer <BBrewer@clawsonandstaubes.com>, gregg@alfordlawsc.com, Sarah Sanford <sarahsanford@palmettobluffonline.com>, sarah borton <sborton@islandpacket.com>, Will Folks <will.folks@gmail.com>, david@myrtlebeachsc.com, Alex Kinkaid <akincaid@islandpacket.com>, Andrew Knittle <aknittle@postandcourier.com>, Glenn Smith <gsmith@postandcourier.com>, dpascoe@scsolicitor1.org, WilliamH@hiltonheadislandsc.gov, Bill Geist <bill@dmoproz.com>, jrosen@rrhlawfirm.com, djennings@rrhlawfirm.com

Art, your full support is much appreciated!
We have filed many lawsuits as you know and came to realize this is the only way to clean up corruption in SC, all talk and no action goes nowhere. We have now gotten rid of the publisher of our local newspaper who harmed this island for 25 yrs with her censorship of local news in favor of her biggest advertisers and corrupt friends of her and her husband. This investigation is still ongoing and want to depose both her and her husband as our lawsuits keep going to clean up all the corruption and unconstitutional use of our tax monies by many crooks and liars.
I have attached very important links for you and everyone on the only way to restore transparency, accountability and performance metrics to SC. Please just read the short intro on both links by Dr Armand Fusco and auditor of Palm Beach who performed the forensic audit on the Cvb city Dmo. Also attached, the current ongoing raid on the Berkeley County chamber and 386k theft by the School system CFO. This is the beginning of the end for many corrupt institutions in SC. Imagine this was the first raid by the FBI and forensic audits forced on SC institutions in 100 yrs and both resulted in crimes. Never in the history of the entire USA has a forensic audit been done on these type institutions and even local city government Town managers and town lawyers where wrong doing was not discovered and prison the result in many cases.
I am calling for the creation of totally independent FACS (Forensic Audit Committees) and IAC (Independent Audit Committees) to be set up in every city in SC. These committees are formed with retired and volunteer CPA with full knowledge of accounting and proper audit procedures.

Read these links, it will take 10 mins to read all. Once we do this, we will restore civil behavior to our state and save millions in tax monies and put millions back into the coffers of our federal IRS system. Thanks again for having the courage to respond and support my extremely controversial fight. Also attached is info on my lawsuit

to the financials to tax payers on how it uses and unconstitutionally misuses our tax monies, will be decided in the SC Supreme Court soon. The secrecy, theft and misuse of our tax monies by these tax scam improperly operated Chambers CVBS and city Dmos must end nationwide. The Irs Ubit Violations are in the hundreds of millions, our country needs this money to pay for our military, roads, bridges and must stop this nationwide fraudulent scams.

I have cced / bced many law enforcement agencies both state and federal and bced those who need to be protected. I have also cced the presidents of these national Chambers and Dmo Cvb associations, whom I have informed and their lawyers as frauds and part of these scams to violate our country and non profit 501-c6 tax codes and IRS Ubit laws. I have filed IRS Whistle blower cases against many crooks over 70 who operate the largest city CVBS Dmos and some Chambers in the USA and the 3 largest crooks in SC who operate the Hilton Head co-mingled Chamber Cvb city Dmo, Charleston Cvb and Dmo and Myrtle Beach co-mingled Chamber Cvb city Dmo. These organizations are robbing us of millions with zero oversight, no audits, no performance metrics and many like Berkeley SC chamber and Palm Beach Cvb discovered committing crimes such as embezzlement, fraud and theft to our tax funds.

https://www.yankeeinstitute.org/wp-content/uploads/2015/07/Ending-Corruption-and-Waste-In-Your-Public-School.pdf

https://www.mypalmbeachclerk.com/uploadedFiles/Public_Funds/cvb_audit_report.pdf

http://abcnews4.com/news/crime-news/fbi-investigating-berkeley-county-chamber-of-commerce

https://www.postandcourier.com/news/former-cfo-of-berkeley-schools-confesses-to-taking-from-the/article_01d5ebf2-f2f1-11e6-95e7-135411516e67.html

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Dec 6, 2017, at 2:38 PM, Art Davis <art@globallylocally.com> wrote:

> Good to see this moving ahead.
>
> Art
>
> On Tue, Dec 5, 2017 at 12:05 PM, Skip Hoagland <shoagland@me.com> wrote:
>
> > FYI, another First Amendment Lawsuit just filed against the Town of Bluffton and Full time Realestate agent part time Mayor Lisa Sulka. Tell me how we have effective Mayor leadership, when our Mayor is a top performing full time Realestate agent. Not possible to wear to hats. We need full time Mayors with no horse in the race.
> >
> > I am committed to stopping all abuse, corruption, lying, deceiving, disrespecting, conflicts, unconstitutional misuse of tax payers monies, no transparency, no accountability, no proven performance metrics, no audits, no contracts, no procurement, no non profit corporation act and foia laws complied to. We must end all this by demanding forensic audits and full investigations on all those who control, receive and issue our tax monies to clean the slate. After these forensic audits, we must stop allowing those in question or those who receive our tax monies to hire their own audits, versus being audited independently. I am calling for a what I call a FAC (Forensic Auditing Committee) and INC (Independent Auditing Committee) to be set up in every city in SC. These committees made up of accounting experts retired or still working to serve with term limits.
> >
> > In order for school boards and their employees to protect, maximize and monitor school resources with due diligence, it is essential that all school operations and practices be reviewed and analyzed independently and constantly. The most effective way to begin and maintain such a process is to form a community-based Forensic Auditing Committee (FAC). One of its primary tasks would be to ask critical questions of the school board. The reason for asking the questions is to determine quickly and easily whether board policies and school practices are protecting and maximizing school resources effectively, efficiently and ethically and that they are free from the ravishes of potential or actual corruption. This same process should also be for Town councils, who approve issue and control our tax monies used by Town managers, and issued to non profits like Chambers, CVB's, acting city Dmos and others. We must stop all abuse, unconstitutional misuse of our tax monies by

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

of Hilton and our weak, lying, conflicted, disrespectful elected officials and Town employees are continuing to allow and operate. It's all an unconstitutional misuse to do so by our local and state governments. The harm this secret unconstitutional misuse of our tax monies in the tens of millions, is causing many forms of both harm to others, as well as crimes, and even violations to our Irs tax system. We must fix all this with full transparency and force compliance to procurement laws, Foia laws , non profit corporation act laws, proper constitutional use of tax monies, stop unfair competitive practices against tax paying companies using tax monies, restore proper function by those who receive our tax monies, stop issuing tax monies for private purposes, demand independent audits not hired audits by those we hand our tax money to, demand and force forensic audits on those who refuse transparency on how they use our tax money.

Without full transparency, true independent financial audits , forensic audits and forcing truth in our government by all elected officials and hired government employees, nothing will change and different forms of corruption, harm to citizens and our tax system will continue.

What I will not allow is crooks and corrupted local officials to scheme file lawsuits against citizens that could not be anymore abusive and harmful, to attempt to silence citizens who speak up in trying to expose, stop and clean up local, state, and federal corruption. This is the reason this First Amendment lawsuit and all others I have filed is so important. I feel this is the only way to clean it all up.
These lawsuits will accomplish more than our local state officials could or would accomplish in a life time of serving, as many officials simply want tackle these hard issues in fear of not getting re-elected, loss of jobs, retaliation by crooks, etc. again a Spotlight Movie scenario. Not one elected official on this email has been willing to stand up, debate, disagree or agree with all I say and have discovered. As we all know unlike myself, many state politicians are connected to incestuos relationships and part of all the corruption, not the solution. Lawsuits, depositions, discovery, facts, state and federal investigations and hopefully honest judge and jury decisions are the solution. I am not part of corruption and if my harsh criticism is found to be guilty over the corruption I expose, then God help us, and all will be lost as no one will take my place, nor want to. A big test for SC is coming soon and that will be the Supreme Court ruling on my Foia lawsuit against the Hilton Head Chamber controlled by Bill Miles, David Tigges of McNair Law firm, Paula Bethea past lottery commissioner, Ray Warco Webster Rogers Accounting firm and several others. If we do not get a favorable ruling in the highest court in SC, this will signal the incestuos political corruption runs all the way to the top. Our next and only hope will be the federal law enforcement agencies IRS , FBI and DOJ.

Thanks

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Sep 2, 2017, at 5:38 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> Tabor / Rick / Mike / Stu, are you all serious or is this a joke and fake news report? I know Lucas High, he is a good honest reporter. So this must be true. Anyone who does not believe Jeff Moss, Bill Miles and all our Town governments including Steve Riley, Gary Kubic and Marc Orlando does not need forensic audits after 100yrs, and in light of corruption swirling around, the current Berkeley country SC FBI raid, must be incompetent. Fact Jeff Moss lied and he hired the cookie cutter audit under great suspicion. Fact, you lie once you will lie twice and much more. All 4 of you have to be

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

town officials are so corrupted, we need outside emergency help. We are in severe corrupted crisis. Mr Covert, to my knowledge is the only one out of these men who have a clue on how to run and build a local company. How could myself or others trust you in business, or buy air conditioning from you if you can't keep you campaign promises and force transparency? Mike wake up, you will sell more air conditioning units as a champion of tax payers, than you will as a influenced corrupted crook or in fear to not speak up and act and committing fraud not living up to your campaign promises. This is not the way to build your local business.

You said in the article:
"Council members Mike Covert, Rick Caporale, Tabor Vaux and Stu Rodman made the informal recommendation and were careful not to call for a "forensic" audit, which they say would hint at criminal wrongdoing.

Instead, the councilmen suggested what they refer to as an external audit, but offered few specifics on how deep the audit should go."

Then worse, and only someone either highly corrupted of incompetent would say Quote.

"Covert and Caporale, though, were adamantly against a forensic audit."

Can we get honesty from any of you, no games and fully explain your position and why ? Tell us how you plan to confirm we have no theft, fraud, embezzlement or credit card misuse? Why in the hell do you think an audit would just focus on credit cards? No one could be that clueless.

You all know and even an ignorant buffoon knows after all our education, a hired cookie cutter audit by crooks Jeff Moss, Bill Miles, Steve Riley, Gary Kubic and Marc Orlando are not designed to catch fraud, theft, embezzlement and credit card misuse, only a forensic audit does this. I believe the audits they hired will prove they purposely overlooked embezzlement, etc and like Berkeley SC school CFO and Palm Beach Cvb audit will prove this. Both their hired audits and many more in the USA, once forensically audited, prove an audit hired by a crook, versus independent audits are corrupted.

Perhaps you 4 men need to know, and more education, never in the history of the entire USA has a forensic audit been done on anyone who fights to not comply, or even volunteer to a forensic audit or an FBI investigation on a school system, Chamber, Town Government, City Dmo or Cvb where wrongdoing was not discovered and most cases resulted in prison.

So are you going to continue to be in denial, act like corrupted ignorant buffoons, or are you going to clean up your act, get tough and do what's right?

Do you 4 men really believe that no forensic audits are needed, after FBI raid on Berkeley sc School CFO 400k theft? Do you really think lying Jeff Moss is honest?

Read this Palm Beach audit or are you so corrupted and incompetent it makes no difference to you.

http://www.mypalmbeachclerk.com/uploadedFiles/Public_Funds/conv_ctr_audit_report.pdf

Do you think I am out of mind when I tell you Jeff Moss, Bill Miles, Ray Deal, Ray Warco and many others are going to prison once a forensic audit is done or a FBI raid happens? Do you 4 men actually believe a cooker cutter independent audit will catch fraud, theft and embezzlement? No one of normal thinking, could possibly believe this. The entire Beaufort county system and every single person who has access to or control of our tax dollars, needs to be forensically audited and seems now all of you included. Are you 4

about as useless of an elected official as we could have.
http://www.islandpacket.com/news/local/community/beaufort-news/article170793012.html

To end, you were all elected based on your campaign promises, that none of you have honored to date, you seem to all have intentionally committed fraud to local tax payers. So yes I am calling you all frauds along with the frauds, liars and thieves you now try to protect. Not one elected official or Mayor is forcing transparency, accountability or proven performance metrics in the entire Beaufort county. You are all weak gutless frauds. May God or the FBI help and save us in Beaufort county, seems our only 2 hopes. Don't count on God, he has a very busy schedule.
Thanks

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 27, 2017, at 1:02 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> Once the FBI gets involved, which I feel is imminent, this board will not fair well. Forensic audit is certain to put Moss in prison. A bigger fish will be the Audit firm in Charleston, that Moss hired, as well as over 10 School districts around the state to do cookie cutter audits on billions of dollars. Based on what just happened in Berkeley sc with the School CFO theft of 400k and the Chamber embezzlement, does anyone on this email actually believe, including this School board, FBI, IRS and God himself, forencic audits will not discover massive corruption, fraud, embezzlement of millions across this state? There is only one reason any School board or Town council would not vote in favor of an audit, they are crooks 100%, either paid off, receive kick backs, outside jobs for friends or relatives, etc etc. It can't be based on incompetence, as no one could be this illiterate.
>
> 1.School board majority- refuses to vote for audit ?
>
> 2.Hilton Head Town Council -Refuses to vote for audit on proven crooks Bill miles or Steve Riley. John Mcann and other council members are proven crooks and liars. They are on record saying we saw the books no audit needed a lie, we trust everyone a lie, and finally a classic statement from a council member, "no audit we are scared of what we will find"
>
> 3.Beaufort Town Council refuses to vote for audit on all Chambers or Gary Kubic.
>
> 4 Bluffton Town council refuses to vote for audit on Marc Orlando and crook Lying Mayor Sulka. They both have been caught using Town employees illegally on tax payers paid time to profit a private corporation.
>
> 4 Sarah Borton refuses to allow the young reporters or editors to tell the real story on local corruption on her friends and large advertisers. USCB Jane Upshaw, Bill miles, Atax committee members, LCGOA her husband Brett Borton ran Connected to many local crooks. She refuses to report on all the lawsuits I have filed and filing. She deletes Blog post from any articles that favor me and my exposure.
>
> 5. Attorney general, SC ethics commission, Sled, Governor has done zero and in fact some of these under suspicion themselves.
>
> 6. Local elected officials Mark Sanford, Tim Scott, Tom davis, Weston Newton, Jeff Bradley and Bill Herbkersman have done zero. We need to face them at every public place where they speak and force them to answer our questions. They all need to be booted and publicly humiliated. Crook lawyer David Tigges of McNair law firm was appointed to the SC chamber board by crook and Lying Ted Pitts and David tigges secret lawyer for Steve Riley and lawyer for Bill miles fighting my Foia lawsuit in the Supreme Court. Crooked is an option understatement, imagine politicians say have not made up their minds yet?

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

c7c6e3e329b0.html

7. Perhaps the most laughable and corrupt of all is all the Town councils in Beaufort county joined all the Chambers as members using our tax money. No Island Packet story on this? Who is a member just crook Steve Riley who wrote the checks, all council members ? Or all tax payers ? They all will not force as members, the Chambers to open their books to members under the sc non profit corporation act laws. They are all crooked. Sarah Borton will not report this ?

8. The law local Hilton head Chamber crooks Bill Miles and his appointed new puppet Chairman Jay weindl manager of the Sonesta Resort have denied a chamber membership to local lawyer Russ Keep, who is in good standing in this community for 40 yrs and known for his honesty and integrity. This is outrageous a Atax public funded Chamber, plus a Chamber Steve Riley joined would deny Russ Keep from becoming a member as they suspected he would demand access to the books under the sc non profit corporation act. They also denied me 3-4 yrs ago when crook Tom Upshaw past President of Palmetto Electric was Chamber Chairman. They now are denying a member Ryan McAvoy his request to the chamber books under his right as a member to full compliance under the SC non profit corporation act laws. Bill miles, Ray deal controller and Jay weindl are claiming his membership was denied after they fully accepted Ryan and cashed his check. Skip Hoagland was kicked out of the Beaufort Chamber for asking for access to the books under the sc non profit corporation act laws. I was denied membership in the SC Chamber, Myrtlebeach Chamber, Charleston Cvb. I was accepted by the Greater Bluffton Chamber, perfectly operated and will fully comply to Foia laws, non profit act laws etc.

Folks all has never happened to 3 local business people and one a lawyer, in 100 yr history in the entire USA. This could not be anymore criminal. Sarah Borton will not report it ?

Like I said citizens and tax payers in Beaufort county are surrounded by crooks in every corner. Even local judges tied to crooks. Incestous SC, perhaps there is no hope and only choice is to live with it and accept the fact this is the way it will be in SC. No transparency, no audits, limited Foia, no procurements, no non profit corporation act laws.

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 27, 2017, at 1:52 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> Shocking ! Audit firm Bill miles hired JW hunt company in Columbia ,same audit firm as Charleston Cvb. Bobby Creech auditor at this firm quits and now works for Bill miles accountant Ray Warco at Webster Rogers on Hilton Head?
> John Mcann announces run for Mayor he is a liar
> Kim Likins and lawyers caught stealing 200k to fund a private lawsuit.
> David tigges , Bill miles lawyer secretly represents Steve riley.
> Sarah Borton will not cover anything that does not slant to protect

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

My God we are all in trouble. Houston we have a problem !!!!

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

Begin forwarded message:

From: CC Hoagland <skiphoagland@yahoo.com>
Date: August 27, 2017 at 1:33:39 PM GMT-3
To: fran bisi <eyelandart@yahoo.com>, mark@marksanford.com, Tim Scott <joe_mckeown@scott.senate.gov>, jwiendl@sonesta.com, tecklenburgj@charleston-sc.gov, jrhodes@cityofmyrtlebeach.com, psommerville@bcgov.net
Cc: "Caporale, Rick" <rcaporale@bcgov.net>, "Orischak, Josephine A" <Josephine.Orischak@beaufort.k12.sc.us>, REBECCA BASS <muttleycrew2008@gmail.com>, Jim Bequette <jwbterp@aol.com>, Marilyn Bullard <bullardpiwko@aol.com>, jerry at the beach <gringoviejotwo@yahoo.com>, Tony Cambria <info@windrunnerstables.com>, "mkeel@sled.sc.gov" <mkeel@sled.sc.gov>, "Meyerhofer, Kelly" <kmeyerhofer@islandpacket.com>, "Gwozdz, Christina S" <Christina.Gwozdz@beaufort.k12.sc.us>, "Flewelling, Brian" <brianf@bcgov.net>, "Kinton, Geraldine C" <Geraldine.Kinton@beaufort.k12.sc.us>, "shannonerickson@schouse.org" <shannonerickson@schouse.org>, "johncrangle2@gmail.com" <johncrangle2@gmail.com>, "Stewart, Jerry" <jstewart@bcgov.net>, "Dawson, Gerald" <gdawson@bcgov.net>, Rick Brundrett <rbrundrett@islandpacket.com>, "michaelrivers@schouse.gov" <michaelrivers@schouse.gov>, "Campbell, Earl" <earl.campbell@beaufort.k12.sc.us>, "ami@ethics.sc.gov" <ami@ethics.sc.gov>, "jdpc@hargray.com" <jdpc@hargray.com>, "tom@senatortomdavis.com" <tom@senatortomdavis.com>, "Dunkle, Joseph R" <Joseph.Dunkle@beaufort.k12.sc.us>, "taylor@harrisonfirm.com" <taylor@harrisonfirm.com>, Liz Farrell <efarrell@islandpacket.com>, "Staton, Jennifer A" <Jennifer.Staton@beaufort.k12.sc.us>, "pgrant@sled.sc.gov" <pgrant@sled.sc.gov>, "tmbdab@aol.com" <tmbdab@aol.com>, "marksanford99@gmail.com" <marksanford99@gmail.com>, "Fobes, Steve" <sfobes@bcgov.net>, Joseph Iaco <jiaco@bellsouth.net>, "Rodman, Stewart" <srodman@bcgov.net>, "awilson@scag.gov" <awilson@scag.gov>, "Spiker149@hargray.com" <Spiker149@hargray.com>, "wnewton@jsplaw.net" <wnewton@jsplaw.net>, "cnrgbr@hargray.com" <cnrgbr@hargray.com>, "deann.komanecky@blufftontoday.com" <deann.komanecky@blufftontoday.com>, "zoomru@yahoo.com" <zoomru@yahoo.com>, "Gregory, Cynthia W" <Cynthia.Gregory@beaufort.k12.sc.us>, John Dowling <dowlingjohn287@gmail.com>, "rgregory@sled.sc.gov" <rgregory@sled.sc.gov>, "shamm@ethics.sc.gov" <shamm@ethics.sc.gov>, "jbagnall@ethics.sc.gov" <jbagnall@ethics.sc.gov>, "Cordray, Mary M" <Mary.Cordray@beaufort.k12.sc.

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

<dwilliams@sled.sc.gov>, "mburchstead@ethics.sc.gov" <mburchstead@ethics.sc.gov>, "usn1066@gmail.com" <usn1066@gmail.com>, "lgibson@scag.gov" <lgibson@scag.gov>, "Crosby, Tonya V" <Tonya.Crosby@beaufort.k12.sc.us>, "aldenbauer706@gmail.com" <aldenbauer706@gmail.com>, "Cushingberry, Robyn L" <Robyn.Cushingberry@beaufort.k12.sc.us>, "contact@beaufortwatchdog.org" <contact@beaufortwatchdog.org>, "Payne, Wilbur M" <Wilbur.Payne@beaufort.k12.sc.us>, Auditor <auditor@bcgov.net>, "Striebinger, David R" <David.Striebinger@beaufort.k12.sc.us>, "Covert, Michael" <mcovert@bcgov.net>, tdavis@harveyandbattey.com, "William G. Bill Herbkersman" <schsdistrict118@aol.com>, John Munro <JMunro@seapines.com>, Steve Birdwell <sbirdwell@seapines.com>, gerard mahieu <gerardmahieu@aol.com>, Marc Frey <mfrey@freymedia.com>, Sarah Borton Sarah Borton <sgillis@islandpacket.com>, Jay Bender <jbender@brblegal.com>, Dave Schwartz <dave@scpolicycouncil.org>, Jim Carpenter <james.carpenter@carpenterlawfirm.net>, Cynthia Bensch <bensch@hargray.com>, David Ames <amesco@earthlink.net>, Lee Bright <Lee@brightagencyinc.com>, Russ Keep <hhlaw@hargray.com>, joeborelli1@mac.com, Justin New Orleans Lawyer Justin New Orleans Lawyer <jwinch@smithstag.com>, Art Davis <art@globallylocally.com>, Jeremia Froyland <jeremiafroyland@gmail.com>, josh metnick <josh@chicago.com>, Fred Mercaldo <fred@scottsdale.com>, Austin Andrukaitis <austinandrukaitis@gmail.com>, John Keener <john@charlestoncrabhouse.com>, John Durst <john@scrla.org>, nancy watt <wtghhi@aol.com>, linda rew <linda@hiltonhead.com>, dan@media360.com, eric@laislamagazine.com, Ryan McAvoy <mcavoylegend@gmail.com>

Subject: May God help us !!!! same audit firm as Jeff Moss hired was just hired as new audit firm by Berkeley School system after FBI discovered 400k theft. Houston we have a problem!!!!

Read link below, oh my God new audit firm for Berkeley county Schools the FBI just discovered 400k in theft on, Berkeley school board just hired the same firm Jeff moss and ten others hired ? No procurement? No clue this firm like their last firm that missed the 400k theft, is under suspicion of missing theft/ misuse by Jeff Moss.
Folks we are in big trouble !

Again the full time employees and lawyers have seized total control from the few honest and mostly corrupted Part time board members. I know of no successful company where the employees tell the owners what to do and worse refuse the owners access to see the books ? This is simply massive insanity and an extremely broken and failed system. Only one act will work under this Broken system, a Forencic audit and FBI / IRS investigation. No one in SC can be trusted no one. Reagan theory only!

It is very sad to watch so many good people fight so hard to try and win against all this corruption without an audit. There is zero chance of victory without it. Moss and his full time lawyer, along with those they have corrupted on the board, will never be stopped without

SC. This will need to be out of state or better all overseen and done in alliance with the FBI investigation like Berkeley SC.

My God again our investigative team just discovered Berkeley county just hired a new audit firm and same firm Jeff Moss hired. This firm once audited like Palm beach and the last audit firm will also turn out to have missed massive corruption by Jeff Moss. The question is, and FBI needs to act, will this firm and its auditors be tied to the corruption and embezzlement ? Houston we have a problem ? How is it possible FBI catches this theft and now the Jeff moss hired audit firm is hired by the Berkeley school board ?

https://www.berkeleyind.com/news/school-board-agrees-on-new-auditor/article_ddb0077e-35c8-11e7-acac-2f2854e94e89.html

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

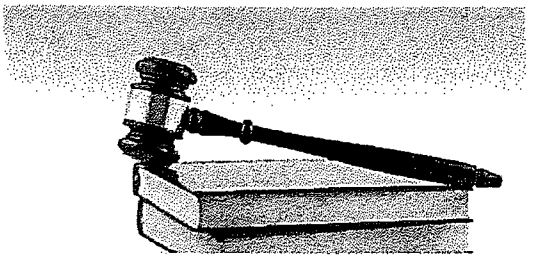
On Aug 27, 2017, at 10:38 AM, Orischak, Josephine A <Josephine.Orischak@beaufort.k12.sc.us> wrote:

> Jerry,
>
> Regarding our new meeting structure, Joseph Dunkle's reservations about it not providing adequate time to discuss topics are most relevant. Look at it this way: the board previously had six committees, four of which met monthly/regularly for (approximately) 2 hours each. That's **8 hours** worth of discussion of **important issues** that was taking place each month. This estimate doesn't even include the two committees (HR and Legislative) that met periodically, as well.
>
> We've now cut that monthly discussion time literally in half down to **4 hours**.
>
> While we all appreciate the notion of reducing meeting costs, I am not sure how valid this argument is now that we know the potential costs of upgrading central office's video recording capabilities.
>
> In summary, the Board (in whole or part) will only be publicly gathered twice monthly now. As such, my greatest concern remains that the Board will be asked to vote/take action with considerably less time to discuss/vet important issues.
>
> JoAnn Orischak
> District 11
>
> Sent from my iPad
>
> On Aug 27, 2017, at 8:13 AM, "jerry at the beach" <gringoviejotwo@yahoo.com> wrote:

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

transparency? The effects of Beaufort County school board's meeting changes



More money? Less transparency? The effects of Beaufort County school boa...

Changes to Beaufort County Board of Education meetings in South Carolina could cost the district more money and,...

Board member Kinton said: *"Eliminating committee meetings will save the district money, argued Kinton, who spearheaded the overhaul of the meeting format."*

When Candidate Kinton was asked; What specific steps will you take to make government more open and accessible to the public?

Candidate Kinton said: *"I believe the school board should govern by committees that include community members. Committees should be charged with researching topics, hearing recommendations from administration, challenging administration recommendations when appropriate and making final recommendations to the full school board. Board committees will provide more opportunities for parents, citizens and stakeholders to become engaged, informed and involved in the process of educating our children."*

Oh, my! Read it again folks, and if you don't believe me, here is the link.
http://www.islandpacket.com/news/politics-government/election/article33484737.html#storylink=cpy

G.A. Smith
Well represented in Dist. 11

Sent from my iPhone excuse all typos and misspellings

Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 31, 2017, at 7:32 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> It's time to get serious and do what's right .
> The corruption, lack of transparency, accountability, proven performance metrics, lies, secrecy and denial must end. If our County officials will not act, then we need to get state and federal authorities to force them. This crisis must end !!!
> It's time to now file a lawsuit. Please everyone send me your ideas for this.
> Beaufort Watch Dog will pay all cost !

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 28, 2017, at 4:20 AM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> I will address the "audit" for those not copied on my last email. A financial audit performed by an independent accounting firm is addressing the financial condition at a given point in time. Their primary focus is to determine if the income statement and balance sheet is a fair reflection of the financial condition and performance**when taken as a whole**. If you read the supplemental opinion, that is what the accountant is saying. He is not giving an opinion as to the proper allocations of income and expenses. Therefore, in order to establish the true income and expense from each activity you must see a detailed general ledger and other documents and records to make our own determination as to the true allocation of income and expenses and thus the unrelated business income. The schedules attached to these financial statements reflect exactly -0- for the net income from each activity other than members services. As any reasonable person would know, this is not possible.
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland
> US cell 843-384-7260
> Buenos Aires , Argentina
> 011-54-9-11-5942-3202

On Jul 28, 2017, at 4:00 AM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> I would like to address the UBI issue from the earlier emails. Most of the 90 or so

Chambers city Dmos report no or very little UBI. This is because they offset the income with the cost to produce this income. They are incurring labor cost to develop the webpage for the local chamber and CVB which promotes the city while also producing advertisements for businesses willing to pay them to be listed. These same employees are utilized to develop the site to book hotel rooms and flights etc. Their 990s frequently show exactly -0- for UBI. Others show losses while a few show some small profits. (Only a couple reflect any significant UBI) If a CVB shows a loss, then it means that membership dues or government funding subsidized these efforts. The problem remains that almost none of them make any effort to split our their labor and other costs to produce the UBI. Therefore we do not know how much they are truly making or even what their gross revenue is from these activities. If for example they received $10M from advertisers and from booking revenues and only $5M from membership dues and state and federal grants, they might show -0- unrelated business income due to how they allocate expenses. The CVB's and Chambers will spend all they get as there is no profit motive.

Sent from my iPhone
excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires,

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

On Jul 27, 2017, at 6:37 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

Cookie cutter audits are not meant to catch crimes. This is why our state is in trouble. Never in the 100 year history has any School districts, chambers and towns been forensically audited. Berkeley county SC first one on Sc. Those in other states that have refused forencic audits and then forced or investigated by the FBI IRS investigations have mostly resulted in prison. Here is your answer. Palm beach type audits

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Buenos Aires , Argentina 011-54-9-11-5942-3202

On Jul 27, 2017, at 5:59 PM, fran bisi <eyelandart@yahoo.com> wrote:

I think what you have attached isn't referring to a forensic audit, but a CAFR that Moss was referring to...AKA Cookie Cutter.

fran

On Thursday, July 27, 2017 5:22 PM, "Caporale, Rick" <rcaporale@bcgov.net> wrote:

Fran:

When we think or talk about audits, we should all recall the

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

of auditing firms in the financial meltdown. A few of whom are no longer in business. Have we forgotten so soon? The attached document ("Are Audits Worthless") is worth a quick read.

RC

From: fran bisi [eyelandart@yahoo.com]
Sent: Thursday, July 27, 2017 4:19 PM
To: Orischak, Josephine A; REBECCA BASS
Cc: Jim Bequette; Marilyn Bullard; jerry at the beach; Tony Cambria; mkeel@sled.sc.gov; Meyerhofer, Kelly; Gwozdz, Christina S; Flewelling,

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Geraldine
C; shannonerickson@schouse.org
; johncrangle2@gmail.com;
Stewart,
Jerry;
Dawson,
Gerald;
Rick
Brundrett; skiphoagland@yahoo.
com; michaelrivers@schouse.gov
;
Campbell,
Earl; ami@ethics.sc.gov; jdpc@
hargray.com; joe_mckeown@scott
.senate.gov; tom@senatortomdav
is.com;
Dunkle,
Joseph
R; taylor@harrisonfirm.com;
Liz
Farrell;
Staton,
Jennifer
A; pgrant@sled.sc.gov; tmbdab@
aol.com; marksanford99@gmail.c
om;
Fobes,
Steve;
Joseph
Iaco;
Caporale,
Rick;
Rodman,
Stewart; awilson@scag.gov; Spi
ker149@hargray.com; wnewton@js
plaw.net; cnrgbr@hargray.com;
deann.komanecky@blufftontoday.
com; zoomru@yahoo.com;
Gregory,
Cynthia
W;
John
Dowling; rgregory@sled.sc.gov;
shamm@ethics.sc.gov; jbagnall
@ethics.sc.gov;
Cordray,
Mary
M; jeffbradley@schouse.gov; dw
illiams@sled.sc.gov; mburchste
ad@ethics.sc.gov; usn1066@gmai
l.com; lgibson@scag.gov;
Crosby,
Tonya
V; aldenbauer706@gmail.com;
Cushingberry,
Robyn
L; contact@beaufortwatchdog.or
g;
Payne,
Wilbur
M;
Auditor;
Striebinger,
David
R;
Covert,
Michael
Subject:
Re:
Moss
Letter
to
editor

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

@5:13

If I'm correct they "selected 40 transactions" for Fiscal Year 2016. They were "examined for compliance with the District's procurement policy and not exceptions were noted." Whatever that means, I'm not impressed. That's less than a day's worth of transactions.

Example: on Jan 5th and 6th of 2016 there were 37 transactions and that's not counting those under $100.

Is this what he calls an audit?

fran

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

Thursday, July 27, 2017 1:53 PM, "Orischak, Josephine A" <Josephine.Orischak@beaufort.k12.sc.us> wrote:

Ali,

FYI: Here is a link to the BCSD website for Procurement Audits performed from 2013 to the present. Open the 'Other Financial Reports' folder to view.

http://beaufortschools.net/cms/one.aspx?portalId=170925&pageId=296554

JoAnn Orischak Beaufort County Board of Education District 11 Hilton Head Island C. (843) 338-1737

Sent from my iPad

On Jul 27,

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

9:36 AM, "REBECCA BASS" <muttleycrew2008@gmail.com<mailto:muttleycrew2008@gmail.com> > wrote:

In his letter, Moss does say "they are reviewed each year by a pair of separate independent audits". We should request copies of these audits and ask who conducted them.

Rebecca

On Thu, Jul 27, 2017 at 9:25 AM, Jim Bequette <jwbterp@aol.com<mailto:jwbterp@aol.com>> wrote:

I am attaching a letter written by the Superintendent which was printed in last night's Internet

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

the Packet/Gazette. Moss asserts that letter writers have asserted that "Beaufort County School District employees have misused tax dollars" using district credit cards. He then states "nothing could be further from the truth".

Why does he not promote having a forensic audit to assure us taxpayers that his statement is factual? Why aren't we given all the facts on the admitted 47 fraudulent charges on those card?. Who did the two separate

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

of P-card that he cites in this letter? Note he doesn't say audits. I will submit an FOIA request for the "reviews".

I read the county government spends about $1 million a year on credit cards while the School District is up about $25 million. The county budget is smaller than 1/2 of the school's.

Many, many charges on those P-cards as reported by Fran Bisi look very questionable.

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

can only quiet down the public uproar by immediately having the Board approve a forensic audit. How can you take his statements as fact after he was already found in two ethics violations?

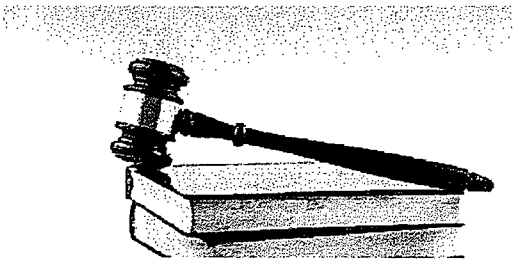
Last I would like to commend Fran Bisi for her great work in exposing what could be a monumental problem. However if Moss and the Board do not approve a forensic audit, the citizens will never know the truth

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Sent from my iPad

On Aug 27, 2017, at 8:13 AM, "jerry at the beach" <gringoviejotwo@yahoo.com> wrote:

More money? Less transparency? The effects of Beaufort County school board's meeting changes



More money? Less transparency? The effects of Beaufort County school boa...

Changes to Beaufort County Board of Education meetings in South Carolina could cost the district more money and,...

Board member Kinton said: *"Eliminating committee meetings will save the district money, argued Kinton, who spearheaded the overhaul of the meeting format."*

When Candidate Kinton was asked; What specific steps will you take to make government more open and accessible to the public?

Candidate Kinton said: *"I believe the school board should govern by committees that include community members. Committees should be charged with researching topics, hearing recommendations from administration, challenging administration recommendations when appropriate and making final recommendations to the full school board. Board committees will provide more opportunities for parents, citizens and stakeholders to become engaged, informed and involved in the process of educating our children."*

Oh, my! Read it again folks, and if you don't believe me, here is the link. http://www.islandpacket.com/news/politics-government/election/article33484737.html#storylink=cpy

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

them.

Jim
Bequette
Retired
CPA
in
Md,
WV,
and
SC

-
-
Rebecca
W.
Bass
Broker
in
Charge
SeaBass
Properties
Real
Estate
Licensed
in
South
Carolina
and
Georgia
843-
263-
3772

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 27, 2017, at 1:33 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> Read link below, oh my God new audit firm for Berkeley county Schools the FBI just discovered 400k in theft on, Berkeley school board just hired the same firm Jeff moss and ten others hired ? No procurement? No clue this firm like their last firm that missed the 400k theft, is under suspicion of missing theft/ misuse by Jeff Moss.
> Folks we are in big trouble !
>
> Again the full time employees and lawyers have seized total control from the few honest and mostly corrupted Part time board members. I know of no successful company where the employees tell the owners what to do and worse refuse the owners access to see the books ? This is simply massive insanity and an extremely broken and failed system. Only one act will work under this Broken system, a Forencic audit and

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

It is very sad to watch so many good people fight so hard to try and win against all this corruption without an audit. There is zero chance of victory without it. Moss and his full time lawyer, along with those they have corrupted on the board, will never be stopped without being forced to audit. Then the question becomes who gets hired to do the forensic audit that can be trusted in SC. This will need to be out of state or better all overseen and done in alliance with the FBI investigation like Berkeley SC.

My God again our investigative team just discovered Berkeley county just hired a new audit firm and same firm Jeff Moss hired. This firm once audited like Palm beach and the last audit firm will also turn out to have missed massive corruption by Jeff Moss. The question is, and FBI needs to act, will this firm and its auditors be tied to the corruption and embezzlement ? Houston we have a problem ? How is it possible FBI catches this theft and now the Jeff moss hired audit firm is hired by the Berkeley school board ?

https://www.berkeleyind.com/news/school-board-agrees-on-new-auditor/article_ddb0077e-35c8-11e7-acac-2f2854e94e89.html

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Aug 27, 2017, at 10:38 AM, Orischak, Josephine A <Josephine.Orischak@beaufort.k12.sc.us> wrote:

> Jerry,
>
> Regarding our new meeting structure, Joseph Dunkle's reservations about it not providing adequate time to discuss topics are most relevant. Look at it this way: the board previously had six committees, four of which met monthly/regularly for (approximately) 2 hours each. That's **8 hours** worth of discussion of **important issues** that was taking place each month. This estimate doesn't even include the two committees (HR and Legislative) that met periodically, as well.
>
> We've now cut that monthly discussion time literally in half down to **4 hours**.
>
> While we all appreciate the notion of reducing meeting costs, I am not sure how valid this argument is now that we know the potential costs of upgrading central office's video recording capabilities.
>
> In summary, the Board (in whole or part) will only be publicly gathered twice monthly now. As such, my greatest concern remains that the Board will be asked to vote/take action with considerably less time to discuss/vet important issues.
>
> JoAnn Orischak

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 31, 2017, at 7:32 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> It's time to get serious and do what's right . The corruption, lack of transparency, accountability, proven performance metrics, lies, secrecy and denial must end. If our County officials will not act, then we need to get state and federal authorities to force them. This crisis must end !!!
> It's time to now file a lawsuit. Please everyone send me your ideas for this. Beaufort Watch Dog will pay all cost !

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Sent from my iPhone excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 28, 2017, at 4:20 AM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> I will address the "audit" for those not copied on my last email. A financial audit performed by an independent accounting firm is addressing the financial condition at a given point in time. Their primary focus is to determine if the income statement and balance sheet is a fair reflection of the financial

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

CVB shows a loss, then it means that membership dues or government funding subsidized these efforts. The problem remains that almost none of them make any effort to split our their labor and other costs to produce the UBI. Therefore we do not know how much they are truly making or even what their gross revenue is from these activities. If for example they received $10M from advertisers and from booking revenues and only $5M from membership dues and state and federal grants, they might show -0- unrelated business income due to how they allocate expenses. The CVB's and Chambers will spend all they get as there is no profit motive.

Sent from my iPhone
excuse all typos and misspellings

Skip Hoagland
US cell 843-384-7260
Buenos Aires , Argentina
011-54-9-11-5942-3202

On Jul 27, 2017, at 6:37 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> Cookie cutter audits are not meant to catch crimes. This is why our state is in trouble. Never in the 100 year history has any Scho[illegible] districts

towns
been
forensically
audited.
Berkeley
county
SC first
one on
Sc. Those
in other
states
that have
refused
forencic
audits
and then
forced or
investigated
by the
FBI IRS
investigations
have
mostly
resulted
in prison.
Here is
your
answer.
Palm
beach
type
audits

Sent from
my
iPhone
excuse all
typos and
misspellings

Skip
Hoagland
US cell

...

[Message clipped]

—
Art Davis
Digital Media Consultant

GloballyLocally | www.globallylocally.com
Cell 760.808.4564 | art@globallylocally.com

—
Gregory M. Alford
Alford Law Firm, LLC
P.O. Drawer 8008
Hilton Head, SC 29938
(843) 842-5500
(843) 842-8400 fax

CONFIDENTIALITY NOTE: THE INFORMATION CONTAINED IN THIS ELECTRONIC MAIL TRANSMISSION IS LEGALLY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING THIS ELECTRONIC MAIL MESSAGE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS ELECTRONIC MAIL IN ERROR,

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

843-842-5500.

ELECTRONICALLY FILED - 2018 Jan 04 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

ELECTRONICALLY FILED - 2017 Mar 27 12:04 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT	)	CASE NUMBER: 2015-CP-07-2937
	)	
KIM LIKINS	)	
	)	**NOTICE OF MOTION, MOTION AND**
Plaintiff,	)	**MEMORANDUM OF LAW IN SUPPORT**
v.	)	**OF MOTION FOR SANCTIONS AND**
	)	**FOR ISSUANCE OF RULE TO SHOW**
C. C. "SKIP" HOAGLAND	)	**CAUSE**
	)	
Defendant.	)	
	)	

YOU WILL PLEASE TAKE NOTICE that Plaintiff Kim Likins ("Plaintiff"), by and through her undersigned attorneys will move before the Presiding Judge of the Beaufort County Court of Common Pleas on the tenth (10^{th}) day after service, or as soon as counsel may be heard, for an Order sanctioning Defendant C.C. "Skip" Hoagland for violation of the Alternative Dispute Resolution ("ADR") Rules.

Mediation in this case occurred on February 2, 2017 and ended in an impasse. *See* Ex. A, Proof of ADR. Hoagland has now published to third-parties, via a March 23, 2017 e-mail to multiple third-parties, certain details of the negotiations. These confidential mediation communications were published by Hoagland as part of an e-mail tirade, purportedly concerning the dismissal of several ethics complaints he had submitted to the S.C. Ethics Commission. As part of the e-mail, Hoagland stated the following concerning the mediation in this case: "The Town lawyers on top of overcharging legal fees and attempting to enrich themselves and their client ***tried to settle this case in mediation for 500k***." *See* Ex. B. (double emphasis added).[1] Hoagland's e-

[1] Exhibit B will be submitted for in camera review because the full e-mail purportedly contains a discussion and attachment concerning the dismissal of an ethics complaint(s). *See* S.C. Code 8-13-320(b) ("If the commission or its executive director determines that the complaint does not allege facts sufficient to constitute a violation, the commission must dismiss the complaint and notify the complainant and respondent. The entire matter must be stricken from public record unless the

ELECTRONICALLY FILED - 2017 Mar 27 12:04 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

mail was addressed to members of the media, elected officials, members of the S.C. Ethics Commission, his own lawyers, and others. Specifically, the e-mail was sent to the following:

> **To:** Steven Hamm <shamm@ethics.sc.gov>,
> Michael Burchstead <mburchstead@ethics.sc.gov>,
> Jimmy Bagnall jbagnall@ethics.sc.gov
>
> **Cc:** gregg@alfordlawsc.com,
> Hulbert Brian brianh@hiltonheadislandsc.gov
> stever@hiltonheadislandsc.gov
> Jim Brown jimbrownlaw@hargray.com
> Taylor Smith Taylor@harrisonfirm.com
> Barrett Brewer BBrewer@clawsonandstaubes.com
> Barrett Brewer Chris Nickels
> <cnickels@clawsonandstaubes.com>,
> davidb@hiltonheadislandsc.gov,
> Dave Schwartz <dave@scpolicycouncil.org>,
> Will Folks <will.folks@gmail.com>,
> james.carpenter@carpenterlawfirm.net,
> "Thenerve.org Rick" <rbrundrett@islandpacket.com>,
> franklinscola@aol.com,
> tdavis@harveyandbattey.com,
> Tim Scott <joe_mckeown@scott.senate.gov>,
> marksanford99@gmail.com,
> chip@limehouseprop.com,
> jeffbradley@schouse.gov,
> Weston Newton wnewton@jsplaw.net

This disclosure of confidential communications from the mediation in this case is a clear violation of the South Carolina ADR rules and Hoagland must be sanctioned. Rule 8(a) of the ADR Rules specifically provides for confidentiality:

> **(a) Confidentiality.** Communications during a mediation settlement conference ***shall*** be confidential. Additionally, the parties, their attorneys and any other person present must execute an

---

respondent, by written authorization to the State Ethics Commission, waives the confidentiality of the existence of the complaint and authorizes the release of information about the disposition of the complaint." *See also id.* at (g) "All investigations, inquiries, hearings, and accompanying documents must remain confidential until final disposition of a matter unless the respondent waives the right to confidentiality. The wilful release of confidential information is a misdemeanor, and any person releasing such confidential information, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year."

ELECTRONICALLY FILED - 2017 Mar 27 12:04 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

> Agreement to Mediate that protects the confidentiality of the process. To that end, ***the parties and any other person present shall maintain the confidentiality of the mediation*** and shall not rely on, or introduce as evidence in any arbitral, judicial or other proceeding, any oral or written communications having occurred in a mediation proceeding, including, but not limited to:
>
> ***(1) Views expressed or suggestions made by another party or any other person present with respect to a possible settlement of the dispute;***
>
> (2) Admissions made in the course of the mediation proceeding by another party or any other person present;
>
> (3) Proposals made or views expressed by the mediator;
>
> ***(4) The fact that another party had or had not indicated willingness to accept a proposal for settlement made by the mediator; or***
>
> (5) All records, reports or other documents created solely for use in the mediation.

Rule 8(a)(double emphasis added). Subsection (b) of Rule 8 contains certain "Limited Exceptions to Confidentiality," none of which are implicated in this case. Rule 10(b) specifically provides for the imposition of "any lawful sanctions, including, but not limited to, the payment of attorney's fees, neutral's fees, and expenses incurred by persons attending the conference; contempt; and any other sanction authorized by Rule 37(b), SCRCP" for a violation of the ADR rules. *See* ADR Rule 10(b) ("If any person or entity subject to the ADR Rules violates any provision of the ADR Rules without good cause, the court may, on its own motion or motion by any party, impose upon that party, person or entity, any lawful sanctions, including, but not limited to, the payment of attorney's fees, neutral's fees, and expenses incurred by persons attending the conference; contempt; and any other sanction authorized by Rule 37(b), SCRCP.").

Here, the Court should impose the following sanctions: payment of attorney's fees associated with preparation for the mediation, payment of attorney's fees associated with

ELECTRONICALLY FILED - 2017 Mar 27 12:04 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

attendance at the mediation, payment of attorney's fees associated with this motion, reimbursement of Plaintiff's 50% share of the neutral's fees, and any other appropriate sanction. The Court should also issue a Rule to Show requiring Hoagland to show cause as to why he should not be held in civil contempt for violation of the ADR rules.

It is worth noting that this is not unusual behavior for Hoagland. Earlier in this lawsuit, Hoagland violated a Consent Temporary Restraining Order. *See* Ex. C. Order filed September 8, 2017. After Plaintiff filed a motion to hold Plaintiff in contempt, he agreed, through subsequent consent order that his conduct had violated the Court's prior Order. *See id.*

CONCLUSION

For the reasons discussed above, the Motion for Sanctions should be granted.

Respectfully submitted,

s/ John P. Linton, Jr.
G. Trenholm Walker (S.C. Bar #5777)
John P. Linton, Jr. (S.C. Bar # 79130)
WALKER GRESSETTE FREEMAN & LINTON, LLC
Post Office Drawer 22167
Charleston, SC 29413
843.727.2200
Email: Walker@wgfllaw.com
Email: Linton@wgfllaw.com

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

ATTORNEYS FOR PLAINTIFF

Charleston, South Carolina
March 27, 2017

EXHIIBT A

ELECTRONICALLY FILED - 2017 Mar 27 12:04 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2017 Mar 20 10:04 AM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
COUNTY OF BEAUFORT	)	PROOF OF ADR OR EXEMPTION
Kim Likins	)	
Plaintiff,	)	
vs.	)	FILE NO.: 2015-CP-07-2937
C.C. Hoagland	)	
Defendant.	)	

(An original and copy of this form is to be completed and filed with the Office of the Clerk of Court and a copy forwarded to the attorneys for the parties within 10 days of the conclusion of ADR, or within 300 days of the filing date of the action, whichever is earlier.)

PURSUANT to the Court's Standing Order for Alternative Dispute Resolution dated _____

A. _____ I certify that this case is exempt from ADR for the following reason and the parties wish to exercise that exemption:

Plaintiff/Attorney for Plaintiff	Defendant/Attorney for Defendant
Print Name	Print Name
Phone/Fax	Phone/Fax
Date: _____	

B. X 1. Alternative Dispute Resolution (ADR) was conducted in the form of:

a mediation

(Note: If binding arbitration has been chosen by the parties but not yet completed, an appropriate order of dismissal must be attached hereto.)

2. The neutral(s) was/were: (Name of arbitrator/mediator):

John H. Tiller

3. The ADR was conducted on Feb 2, 2017 _____

DM: 2216218 V.1

ELECTRONICALLY FILED - 2017 Mar 20 10:24 AM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

4. As a result of ADR, this case should be considered (please check one);

() Fully Settled.

( ) by Consent Judgment, to be filed by _____

or ( ) Voluntary Dismissal to be filed by _____

( ) Partially Settled.

(XX) At an Impasse.

( ) In need of further ADR I ☐ am ☐ am not willing to continue as a neutral. I recommend that ADR resume as of _____.

5. Plaintiff ☒ was present ☐ was not present
Defendant ☐ was present was not present

6. Other participants were:

X Lawyers for Defendant _____
X Lawyer for Plaintiff _____
X Representative for Insurance Carrier _____
_____ _____
_____ Experts
_____ Others _____

7. Choice of the neutral was by:

XX Stipulation
_____ Court Order

8. The total number of hours spent in the ADR conference was: 5.0 hours.

9. Further comments of the neutral:

_____
Neutral's Signature

Date: March 9, 2017

DM: 2216218 V.1

EXHIBIT B
TO BE SUBMITTED IN CAMERA

ELECTRONICALLY FILED - 2017 Mar 27 12:04 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

EXHIBIT C

ELECTRONICALLY FILED - 2017 Mar 27 12:04 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2017 Mar 27 12:04 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

STATE OF SOUTH CAROLINA **COUNTY OF BEAUFORT**	**IN THE COURT OF COMMON PLEAS** **CASE NO:** 2015-CP-07-2937
Kim Likins, **Plaintiff(s),** vs. C. C. "Skip" Hoagland, **Defendant(s).**	**CONSENT ORDER**

2016 SEP -8 AM 11:35
JEANNETTE GRAVEAU
BEAUFORT COUNTY, S.C.
CLERK OF COURT

This came before me on Plaintiff's Motion for Contempt, filed June 29, 2016. While at the hearing parties were able to resolve the issue and agree to the following:

1. The Court entered a Consent Temporary Restraining Order on December 21, 2015.
2. Defendant's advertisement of June 26, 2016 violated the Order of December 21, 2015.
3. After the filing of the Motion for Contempt on June 29, 2016, the Defendant has read and understands the Order of December 21, 2015.
4. Defendant agrees that he will abide by the order of December 21, 2015.

IT IS SO ORDERED:

Honorable Marvin H. Dukes, III
Master in Equity and Special Circuit Court
Judge for Beaufort County

September 8, 2016
Beaufort, South Carolina

WE CONSENT:

G. Trenholm Walker (S.C. Bar #5777)
PRATT-THOMAS WALKER, P.A.
Post Office Drawer 22247
Charleston, SC 29413-2247
843-727-2200
Email: gtw@p-tw.com
ATTORNEY FOR THE PLAINTIFF

Gregory M. Alford, Esq.
ALFORD & THORESON, LLC
P.O. Drawer 8008
Hilton Head Island, SC 29938
843-842-5500
Email: Gregg@alfordlawsc.com
ATTORNEY FOR THE PLAINTIFF

WE CONSENT:

Jim Brown, Esquire
LAW OFFICES OF JIM BROWN, P.A.
1600 Burnside Street, Suite 100
Beaufort, SC 29901
(843) 470-0003
Email: jimbrownlaw@hargray.com
ATTORNEY FOR DEFENDANT

Barrett Ray Brewer
CLAWSON & STAUBES, LLC
126 Seven Farms Dr.., Ste 200
Charleston, SC 29492
(843) 577-2026
bbrewer@clawsonandstaubes.com
ATTORNEY FOR DEFENDANT

ELECTRONICALLY FILED - 2017 Mar 27 12:04 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

ELECTRONICALLY FILED - 2017 Mar 13 3:15 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT	)	CASE NO. 2015-CP-07-2937
	)	
KIM LIKINS,	)	
Plaintiff,	)	**MOTION TO AMEND ANSWER**
-versus-	)	**TO ADD COUNTERCLAIMS,**
	)	**AFFIRMATIVE DEFENSES**
C.C. "SKIP" HOAGLAND,	)	**AND THIRD PARTY DEFENDANTS**
Defendant.	)	
_____	)	

The Defendant moves to Amend his Answer to add counterclaims for barratry based on the Town of Hilton Head Island paying for this lawsuit of Kim Likins against the Defendant. The Plaintiff has sued the Defendant for defamation. The Defendant has just hired attorney Russ Keep, III, Esq. to amend his Answer by adding Affirmative Defenses, Counterclaims for; 1. civil conspiracy, 2. barratry, 3. malicious prosecution, 4. denying First Amendment liberties under color of state authority 1983 action, 5. abuse of process, 6. champerty, 7. civil conspiracy, 8. S.C. Frivolous Tort Claims Act against the Plaintiff and to bring in third party Defendants; 1. Town of Hilton Head Island, 2. Town attorney Brian Hulbert, 3. Mayor David Bennett, 4. Hilton Head Island Council persons, 5. Town Manager Steve Riley. The grounds are that the Plaintiff's attorney fees in frivolously suing the Defendant for defamation are being paid by the Town of Hilton Head Island, South Carolina using tax payer money to deny the Defendant his First Amendment right to free speech against Hilton Head Island elected officials.

THE LAW

SCRCP 15, as did Code pleading in this State, strongly favors the granting of amendments and provides that "leave [to amend] shall be freely given." The drafters of the Rules added language that the amendment should not prejudice other parties. Prejudice in these circumstance means the lack of opportunity to prepare for the issue or the inability to introduce additional evidence if the case is retired. "In the absence of a proper reason, such as bad faith, undue delay or prejudice, a denial of leave to amend is an abuse of discretion." *Forrester v. Smith & Steele Builders, Inc.*, 295 S.C. 504, 369 S.E.2d (Ct. App. 1988) (quoting, *Keniston V. Roberts*, 717 F.2d 1295(9th cir. 1983). Delay in seeking the amendment will not be a sufficient reason unless the amendment prejudices the defendant (*supra*).

ELECTRONICALLY FILED - 2017 Mar 13 3:15 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

CONSULTATION

I have consulted with Gregg Alford, Esq., attorney for Plaintiff Likins about the Motion to Amend and he will not consent.

s/C. Russ Keep, III
SC Bar # 3321
Post Office Box 5877
Hilton Head Island, SC 29938
(P) 843-842-6268
(F) 843-785-8458
hhlaw@hargray.com
Attorney for the Defendant

Beaufort County, South Carolina
March 13, 2017

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT	)	CASE NUMBER: 2015-CP-07-2937
	)	
KIM LIKINS	)	
	)	**NOTICE OF MOTION AND MOTION**
Plaintiff,	)	**TO ENFORCE SETTLEMENT**
v.	)	**AGREEMENT AND FOR SANCTIONS**
	)	
C. C. "SKIP" HOAGLAND	)	
	)	
Defendant.	)	
	)	

YOU WILL PLEASE TAKE NOTICE that Plaintiff Kim Likins ("Plaintiff"), by and through her undersigned attorneys, shall move before the Presiding Judge for the Court of Common Pleas, Beaufort County, South Carolina, located at 100 Ribaut Road, Beaufort, South Carolina, for an Order ordering Defendant, C.C. "Skip" Hoagland ("Defendant" or "Hoagland") to honor the settlement agreement (the "Agreement") entered into by the parties along with the Consent Order on Plaintiff's Motion for Temporary Injunction filed September 8, 2016 (the "Order").

The motion is supported by the Verified Complaint; the affidavits on file; the Settlement Agreement, dated September 8, 2016 and attached as Exhibit "A"; and the Consent Order, dated September 8 and attached as Exhibit "B".

RELEVANT BACKGROUND AND PROCEDURAL HISTORY

On December 10, 2015, Plaintiff filed a Verified Complaint against Hoagland asserting, among other things, that Hoagland is waging a persistent campaign of verbally abusing, defaming, and threatening Plaintiff and taking other action to harm Plaintiff. Verified Complaint, at ¶6. Plaintiff is a member of the Hilton Head Island Town Council, but is employed in the private sector as the executive director of the Boys &

Girls Club of Hilton Head Island. *Id.* at ¶¶ 4-5. Hoagland has attacked Plaintiff's private life and her private sector employment by, among other things, publishing false statements to third-parties (including members of the Board of Directors of her employer) and falsely stating that Plaintiff is unfit for her employment with the Boys & Girls Club of Hilton Head Island. *Id.* at ¶ 6.

Plaintiff filed a Motion for a Temporary Injunction with the Verified Complaint. The motion was supported, in part, by the Affidavit of Michael G. Briggs, the President of the Board of Directors of the Boys & Girls Club of Hilton Head. *See* Aff. of Briggs filed Dec. 10, 2015, at ¶ 2. In that affidavit, Mr. Briggs explained in detail that Hoagland had contacted him and called for Plaintiff to be terminated from her job:

> On December 2, 2015, I received a telephone call from an individual who identified himself as "Skip Hoagland". Mr. Hoagland indicated that he was calling me to demand that Kim Likins, the Executive Director of the Hilton Head Island Girls and Boys Club, be fired from her position because she was a liar and was unfit to be around children.

Id. at ¶ 3. The Court entered an Order, with the consent of the parties, resolving the Motion for Temporary Injunction. The Order provides that for the duration of the lawsuit or further order of the court:

> 1. Defendant will not publish any statement to any third party about Plaintiff's employment at the Boys and Girls Club.
>
> 2. Defendant will make no statement to any third party referring to Plaintiff's fitness for her job or her fitness to be around children.
>
> 3. Defendant will not refer to Plaintiff's employment with the Boys and Girls Club in any statements made to a third party.

Plaintiff filed a Motion for Contempt on June 29, 2016 and, on September 8, 2016, this Court found that the Defendant violated the Order of December 21, 2015 and entered another Order, with the consent of the parties, resolving the Motion for

Contempt. The Order confirms that the Defendant has read and understands the Order of December 21, 2015, and that he agrees to abide by it. "Exhibit A" at ¶ 3. As stipulated in the handwritten settlement agreement, Defendant also agreed to pay Four Thousand One Hundred Dollars ($4,100) to Plaintiff's attorney within 30 days to compensate for Plaintiff's attorney fees. "Exhibit B" at ¶ 2. Hoagland has violated the Settlement Agreement by failing to pay these sums.

Pursuant to the Settlement Agreement and Rule 43 of the *South Carolina Rules of Civil Procedure,* Plaintiff prays that the Court order Hoagland to fulfill his obligations to pay Four Thousand One Hundred Dollars ($4,100) to Plaintiff's attorney and cooperate with the parties to the settlement agreement and for the sanction of an award of attorney's fees to the Plaintiff for being forced to file this motion.

This motion is based upon the law and rules of South Carolina, the uncontroverted and material facts of this case, the settlement agreement attached hereto, the pleadings filed in this case, the discovery conducted this far, and any affidavits or memoranda of law that may be submitted to this Court subsequent to the filing of this motion.

(Signature Page Follows)

Respectfully submitted,

ALFORD & THORESON LLC

By: _____

Gregory M. Alford (#6932)
Post Office Drawer 8008
Hilton Head Island, SC 29938
(843) 842-5500
Attorneys for Plaintiff

Dated this 14th day of November, 2016.

Hilton Head Island, Beaufort County, South Carolina.

EXHIBIT "A"

STATE OF SOUTH CAROLINA **COUNTY OF BEAUFORT**	)	**IN THE COURT OF COMMON PLEAS** **CASE NO:** 2015-CP-07-2937
Kim Likins, **Plaintiff(s),**	)	**CONSENT ORDER**
vs.	)	
C. C. "Skip" Hoagland, **Defendant(s).**	)	

2015 SEP -8 AM 11:35
BEAUFORT COUNTY, S.C.
CLERK OF COURT

This came before me on Plaintiff's Motion for Contempt, filed June 29, 2016. While at the hearing parties were able to resolve the issue and agree to the following:

1. The Court entered a Consent Temporary Restraining Order on December 21, 2015.
2. Defendant's advertisement of June 26, 2016 violated the Order of December 21, 2015.
3. After the filing of the Motion for Contempt on June 29, 2016, the Defendant has read and understands the Order of December 21, 2015.
4. Defendant agrees that he will abide by the order of December 21, 2015.

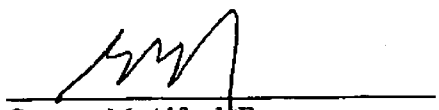
IT IS SO ORDERED:

Honorable Marvin H. Dukes, III
Master in Equity and Special Circuit Court
Judge for Beaufort County

September 8, 2016
Beaufort, South Carolina

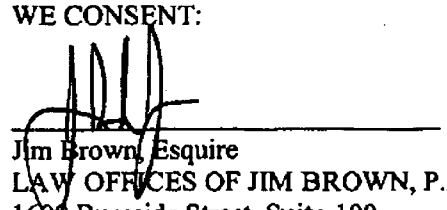
WE CONSENT:

G. Trenholm Walker (S.C. Bar #5777)
PRATT-THOMAS WALKER, P.A.
Post Office Drawer 22247
Charleston, SC 29413-2247
843-727-2200
Email: gtw@p-tw.com
ATTORNEY FOR THE PLAINTIFF

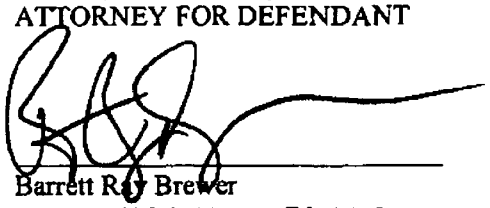


Gregory M. Alford, Esq.
ALFORD & THORESON, LLC
P.O. Drawer 8008
Hilton Head Island, SC 29938
843-842-5500
Email: Gregg@alfordlawsc.com
ATTORNEY FOR THE PLAINTIFF

WE CONSENT:



Jim Brown, Esquire
LAW OFFICES OF JIM BROWN, P.A.
1600 Bumside Street, Suite 100
Beaufort, SC 29901
(843) 470-0003
Email: jimbrownlaw@hargray.com
ATTORNEY FOR DEFENDANT



Barrett Ray Brewer
CLAWSON & STAUBES, LLC
126 Seven Farms Dr., Ste 200
Charleston, SC 29492
(843) 577-2026
bbrewer@clawsonandstaubes.com
ATTORNEY FOR DEFENDANT

EXHIBIT "B"

Likins

v

Hagland

2015-CP-07-2937 ~~2937~~

Plaintiff and Defendant agree to settle the Rule to Show Cause for Contempt by:

(1) entering the consent order on the terms agreed upon;

(2) payment of $4,100 to Grey Alford's escrow account within 30 days (not stated on the record)

(3) Not to be Filed unless unpaid within 30 days

Plaintiff

Kimberly W. Likins

Defendant

A. Trenholm Walker
Attorney

Attorney

September 5, 2016

STATE OF SOUTH CAROLINA	)	**IN THE COURT OF COMMON PLEAS**
	)	
COUNTY OF BEAUFORT	)	**CIVIL CASE NO.: 2015-CP-07-2937**
	)	
KIM LIKINS	)	
	)	
Plaintiff,	)	
	)	**CERTIFICATE OF SERVICE**
vs.	)	
	)	
C. C. "SKIP" HOAGLAND	)	
	)	
Defendant.	)	

I, A. Michael Barnes, with Alford & Thoreson, LLC, certify that I have this date, served one (1) copy of the following:

1. Motion and Order Information Form and Coversheet
2. Notice of Motion and Motion to Enforce Settlement Agreement

; all of which are relative to the above-captioned matter, via hand delivery to:

Jim Brown, Esquire
Law Offices of Jim Brown, P.A.
1600 Burnside St., Suite 100
Beaufort, SC 29901
Attorney for Defendant

Sworn to and subscribed before me on
this 14 day of November, 2016.

Notary Public for South Carolina
My Commission Expires: 9/15/2026

KARLI DIXON
Notary Public State of South Carolina
My Commission Expires 9/15/2026

ALFORD & THORESON, LLC

By: _____
A. Michael Barnes

STATE OF SOUTH CAROLINA)
)
COUNTY OF BEAUFORT)
)
Kim Likins.)
Plaintiff,)
vs.)
)
C.C. "Skip" Hoagland)
Defendant.)

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT

CASE NO.: 2015-CP-07-2937

MOTION AND ORDER INFORMATION FORM AND COVERSHEET

Plaintiff's Attorney:	Defendant's Attorney:
Gregory M. Alford, Bar No. 6932 Address: P.O. Drawer 8008 Hilton Head Island, SC 29938 Phone: 8438425500Fax 8438428400 E-mail: gregg@alfordlawsc.comOther: _____	_____, Bar No. _____ Address: _____ Phone: _____ Fax_____ E-mail: _____Other: _____

☒ **MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)**
☐ **FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)**
☐ **PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)**

SECTION I: Hearing Information

Nature of Motion: Motion to Enforce Settlement Agreement
Estimated Time Needed: 30 Court Reporter Needed: ☒YES/☐ NO

SECTION II: Motion/Order Type

☒ Written motion attached
☐ Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.

_____ November 14, 2016
Signature of Attorney for ☒ Plaintiff /☐ Defendant Date submitted

SECTION III: Motion Fee

☒ PAID – AMOUNT: $ 25.00
☐ EXEMPT:
(check reason)
☐ Rule to Show Cause in Child or Spousal Support
☐ Domestic Abuse or Abuse and Neglect
☐ Indigent Status ☐ State Agency v. Indigent Party
☐ Sexually Violent Predator Act ☐ Post-Conviction Relief
☐ Motion for Stay in Bankruptcy
☐ Motion for Publication ☐ Motion for Execution (Rule 69, SCRCP)
☐ Proposed order submitted at request of the court; or,
reduced to writing from motion made in open court per judge's instructions
Name of Court Reporter: _____
☐ Other: _____

JUDGE'S SECTION	
☐ Motion Fee to be paid upon filing of the attached order. ☐ Other: _____	JUDGE CODE _____ Date: _____

CLERK'S VERIFICATION

Collected by:_____ Date Filed: _____
☐ MOTION FEE COLLECTED: $ _____
☐ CONTESTED – AMOUNT DUE: $ _____

SCCA 233 (11/2003)

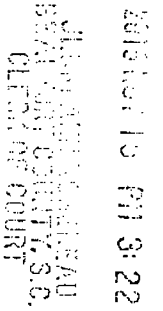
ALFORD & THORESON, LLC

Attorneys at Law
18 Executive Park Road, Building 1
P.O. Drawer 8008
Hilton Head Island, SC 29938-8008
Telephone (843) 842-5500
Facsimile (843) 842-8400
www.alfordlawsc.com

A. MICHAEL BARNES
EMAIL: MICHAELBARNES@ALFORDLAWSC.COM
(NOT FOR CONFIDENTIAL COMMUNICATIONS)

GREGORY M. ALFORD*
MITCHELL J. THORESON
THOMAS E. WILLIAMS†
*Also member Georgia Bar
† Of Counsel

November 14, 2016



Via Hand Delivery
Honorable Jerri Ann Roseneau
Clerk of Court for Beaufort County
Post Office Drawer 1128
Beaufort, South Carolina 29901

Re: Kim Likins vs. C.C. "Skip" Hoagland
Civil Action No.: 2015-CP-07-02937

Dear Ms. Roseneau:

In connection with the above-referenced matter, please find an original and two (2) copies of the following documents:

1. Motion and Order Information Form and Coversheet
2. Notice of Motion and Motion to Enforce Settlement Agreement
3. Certificate of Service

In addition, please find enclosed a check in the amount of Twenty Five Dollars ($25.00) for the filing fee. Please file these documents with the court as appropriate, and clock and return the copies to Autumn Logan. Should you have any questions, comments, or concerns, please do not hesitate to call. Your assistance with this matter is greatly appreciated.

Sincerely,
ALFORD & THORESON, LLC

Michael Barnes
Clerk

Enclosures

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT	)	CASE NUMBER: 2015-CP-07-2937
	)	
KIM LIKINS	)	
	)	**MEMORANDUM OF LAW IN SUPPORT**
Plaintiff,	)	**OF MOTION TO HOLD DEFENDANT**
v.	)	**IN CONTEMPT**
	)	
C. C. "SKIP" HOAGLAND	)	
	)	
Defendant.	)	
	)	

Plaintiff Kim Likins ("Plaintiff"), by and through her undersigned attorneys respectfully submits this Memorandum of Law in support of her Motion seeking an Order holding Defendant C.C. "Skip" Hoagland ("Defendant" or "Hoagland") in contempt for violating the Court's Order on Plaintiff's Motion for Temporary Injunction filed December 21, 2015 (the "Order"), with the written consent of both parties. On June 29, 2016, Plaintiff was forced to file this Motion, because of Hoagland's willful disobedience of the Order. The Order provides that for the duration of the lawsuit or further order of the court:

1. Defendant will not publish any statement to any third party about Plaintiff's employment at the Boys and Girls Club.

2. Defendant will make no statement to any third party referring to Plaintiff's fitness for her job or her fitness to be around children.

3. Defendant will not refer to Plaintiff's employment with the Boys and Girls Club in any statements made to a third party.

As explained herein, Plaintiff has willfully disobeyed this Order by stating, in writings directed to third-parties, that Plaintiff "is unfit to work her day job with boys and girls" and that Plaintiff is unfit for "her private sector job" with the Boys & Girls Club. These direct violations occurred approximately six months after the entry of the Order and approximately three months after Hoagland produced a writing from his files wherein he

openly acknowledged that "As you know Ms. Likins has a temporary restraining order that prevents me from holding her accountable on her job."

BACKGROUND

On December 10, 2015, Plaintiff filed a Verified Complaint against Hoagland asserting, among other things, that Hoagland is waging a persistent campaign of verbally abusing, defaming, and threatening Plaintiff and taking other action to harm Plaintiff. Verified Complaint, at ¶6. Plaintiff is a member of the Hilton Head Island Town Council. She is employed in the private sector as the executive director of the Boys & Girls Club of Hilton Head Island. *Id.* at ¶¶ 4-5. Hoagland has attacked Plaintiff's private life and her private sector employment by, among other things, publishing false statements to third-parties (including members of the Board of Directors of her employer) and falsely stating that Plaintiff is unfit for her employment with the Boys & Girls Club of Hilton Head Island. *Id.* at ¶ 6.

Plaintiff's Motion for a Temporary Injunction, which resulted in the Order at issue in this contempt proceeding, was necessitated by Hoagland's attacks on Plaintiff at her private sector job with the Boys & Girls Club of Hilton Head. Specifically, as stated by the President of the Board of the Boys & Girls Club of Hilton Head:

> On December 2, 2015, I received a telephone call from an individual who identified himself as "Skip Hoagland". Mr. Hoagland indicated that he was calling me to demand that Kim Likins, the Executive Director of the Hilton Head Island Girls and Boys Club, ***be fired from her position because she was a liar and was unfit to be around children***.

See Aff. of Briggs filed Dec. 10, 2015, at ¶ 3 (double emphasis added). As is clear from Mr. Brigg's affidavit, injunctive relief was needed to stop Defendant's actions. Unfortunately, Hoagland has disobeyed the Order and has continued to wage a war

against Likins in her profession, by, among other things, taking out an advertisement in the local newspaper calling her unfit for her job and unfit to be around "boys and girls".

APPLICABLE LEGAL STANDARD

This proceeding involves allegations of civil contempt, as distinguished from criminal contempt. See e.g., Poston v. Poston, 331 S.C. 106, 114, 502 S.E.2d 86, 90 (1998). Plaintiff seeks a contempt order requiring Hoagland to comply with the Order and for an award of Plaintiffs attorneys' fees and costs for having to enforce that Order. Here, Plaintiff's goal is compliance with the Order. Plaintiff also seeks to have her fees reimbursed for having to resort to this contempt proceeding because of Hoagland's willful violations of the Order.

The determination of contempt ordinarily resides in the sound discretion of the trial judge. See State v. Bevilacqua, 316 S.C. 122, 129, 447 S.E.2d 213, 217 (Ct. App. 1994); Floyd v. Floyd, 365 S.C. 56, 71, 615 S.E.2d 465, 473 (Ct. App. 2005); Wilson v. Walker, 340 S.C. 531, 538, 532 S.E.2d 19, 22 (Ct. App. 2000). "In a proceeding for contempt for violation of a court order, the moving party must show the existence of a court order and the facts establishing the respondent's noncompliance with the order." Hawkins v. Mullins, 359 S.C. 497, 501, 597 S.E.2d 897, 899 (Ct. App. 2004); Eaddy v. Oliver, 345 S.C. 39, 42, 545 S.E.2d 830, 832 (Ct. App. 2001). In a civil contempt proceeding, the moving party need only prove the noncompliance by clear and convincing evidence. See e.g., Durlach v. Durlach, 359 S.C. 64, 71, 596 S.E.2d 908, 912 (2004).

This contempt proceeding involves Hoagland's violation of the Order outside the presence of the Court, often called constructive contempt. See e.g., Toyota of Florence v. Lunch, 314 S.C. 257, 267, 442 S.E.2d 611, 617 (1994)(citing State v. Johnson, 249

S.C. 1, 152 S.E.2d 669 (1967)). Charges of constructive contempt are brought by a rule to show cause which must be based upon an affidavit or verified petition. Id. Here, Plaintiff met its initial burden of showing the existence of the Order and Hoagland's willful noncompliance with the Order by filing a motion for a rule to show cause fully supported by affidavit. The Court issued a Rule to Show Cause as follows:

> **BASED UPON** the attached Plaintiff's Motion for Rule Show Cause and to Hold Defendant in Contempt of Court and accompanying affidavits of Michael Briggs and Plaintiff Kim Likins, which more fully explain the alleged violations of the Consent Order entered by this Court on Plaintiffs Motion for Temporary Injunction filed December 21, 2015, it appears that Plaintiff is entitled to have this Court issue its Rule to Show Cause directed to Defendant.
>
> **NOW, THEREFORE, IT IS ORDERED** that you, Defendant C.C. "Skip" Hoagland, shall appear before the Court of Common Pleas for Beaufort County, 102 Ribaut Road, Beaufort, South Carolina 29902, on September 8, 2016 at 9:30 a.m., at which time you should be prepared to show cause, if any you can, as to why you should not be held in civil contempt as alleged by Plaintiffs Motion.

Rule to Show Cause issued September 1, 2016 (footnote omitted).

The burden is on Hoagland to prove his defense. See e.g., Widman v. Widman, 557 S.E.2d 693, 705, 348 S.C. 97, 120 (Ct. App. 2001) (("Once the moving party has made out a prima facie case, the burden then shifts to the respondent to establish his or her defense and inability to comply with the order.")(citation omitted)); see also, Henderson v. Henderson, 298 S.C. 190, 197, 379 S.E.2d 125, 129 (1989):

Courts have the inherent authority to punish offenses calculated to obstruct, degrade, and undermine the administration of justice, and such power cannot be abridged. See Miller v. Miller, 652 S.E.2d 754, 759, 375 S.C. 443, 453 (Ct. App. 2007); State ex rel. McLeod v. Hite, 272 S.C. 303, 306, 251 S.E.2d 746, 748 (1979). "Contempt results from the willful disobedience of an order of the court." Bigham v. Bigham, 264

S.C. 101, 104, 212 S.E.2d 594, 596 (1975); Smith v. Smith, 359 S.C. 393, 396, 597 S.E.2d 188, 189 (Ct. App. 2004). "A willful act is one which is 'done voluntarily and intentionally with the specific intent to do something the law forbids, or with the specific intent to fail to do something the law requires to be done; that is to say, with bad purpose either to disobey or disregard the law.'" Widman v. Widman, 348 S.C. 97, 119, 557 S.E.2d 693, 705 (Ct. App. 2001) (quoting Spartanburg County Dep't of Soc. Servs. v. Padgett, 296 S.C. 79, 82-83, 370 S.E.2d 872, 874 (1988)).

As explained below, because Hoagland has published statements clearly prohibited by the Order, Hoagland should be held in contempt for his willful violations of the Order.

DISCUSSION

I. The Order

As noted above, the Order was signed and filed on December 21, 2015, with the written consent of both parties. Through his counsel, Hoagland agreed to the terms of the Order on the record at a hearing and by the signing the Order indicating his consent thereto. Additionally, Hoagland's document production confirms that he knew the Order was effective.

(a) The Hearing

This Court conducted the hearing resulting in the Order on December 11, 2015. Attorney Taylor Smith appeared at the hearing on behalf of Mr. Hoagland. At the hearing Mr. Smith argued that "My client isn't going out and speaking untrue statements to individuals concerning [the Plaintiff], nor does he intend to." Ex. A, 12/11/15 Hr'g Tr., 13:19-21. The Court then inquired as to whether an agreement on the Motion for

Temporary Injunction was possible and Mr. Smith informed the Court that he did not have authority to enter into an agreement. See Ex. A at 14:19-22. However, the Court took a short break, allowing Mr. Smith to Confer with Hoagland about the motion and Hoagland agreed to resolve it on specific terms. See Ex. A at 14:23-24 & 18:11-15 (Judge Dukes offering to take a break for Mr. Smith to confer with Mr. Hoagland); 15:21-22 and 16:9-11 (Mr. Smith stating that if given a few minutes, he will confer with Mr. Hoagland). After the break, the following was put on the record:

> MR. SMITH: Thank you, Your Honor. The Defendant in this matter, C.C. "Skip" Hoagland, has come to an agreement with the Plaintiff in this case that for the pendency of this matter the Defendant will not do the three following things. ***One, he will not publish any statement to any third party about the Plaintiff's employment at the Boys and Girls Club. Second, he will not refer to the Plaintiff's fitness in her job at the Boys and Girls Club or her fitness to be around children. And third, the Defendant will not refer to the Plaintiff's employment at the Boys and Girls Club in any statement to a third party***. That is the extent of the agreement.
>
> JUDGE DUKES: All right. Thank you. Mr. Alford, is that your agreement as well?
>
> MR. ALFORD: Yes, Your Honor. Thank you. It is exactly what he stated.
>
> JUDGE DUKES: Okay. All right then. Can I ask one of you to prepare that order? Who would like to prepare the order?
>
> MR. ALFORD: Mr. Linton will be happy to do that as soon as he gets back to Charleston. And he will forward it to Mr. Smith for his review and then to the Court.
>
> JUDGE DUKES: Fantastic. ***Just get it to Heather with an affirmation that everyone has seen it and that kind of thing and I will sign it as quickly as possible.*** All right. Thank you both and all for resolving the issue and good luck to you in the future of the case. Anything else for the record?
>
> MR. ALFORD: Nothing for the record. Thank you, Your Honor.
>
> JUDGE DUKES: All right. Thank you. That completes the record.

20:19-22:4 (double emphasis added). See also, Order, 1. ("At the hearing, counsel conferred about the motion and reached the following agreement, which was put on the record in open court and is now memorialized in this Consent Order. . .").

(b) Defendant Consented to the Order

The Order bears the written consent of the attorneys for both parties on behalf of their respective clients. Hoagland appears to dispute his knowledge of the Order even though he is fully bound by it and was aware of its contents well before it was filed. Immediately after speaking to Defendant, his counsel announced in open court the terms Defendant agreed to. After the hearing, the parties' attorneys had an extensive exchange resulting in the signed consent order being submitted to this Court for execution.

By letter dated December 18, 2015, Plaintiff's counsel provided the consent order to the Court, executed by Mr. Smith and Plaintiff's counsel. Mr. Smith was copied on this correspondence. The letter specifically requested that the consent order be signed and filed with the clerk of court by stating as follows: "[i]f it meets with your approval, please sign the Order and forward it to the Clerk of Court." The Order was entered, with the written consent of all parties, on December 21, 2015. Plaintiff's counsel's letter asking that it be sent to the clerk of court was filed along with the Order.

On March 25, 2016, Mr. Hoagland produced documents in response to Plaintiff's discovery requests. *See* Ex. B. Included in this production were "typed documents from Mr. Hoagland for his town council speeches." Ex. B. One such "speech" included the following statement:

> **"AS YOU KNOW, MS. LIKINS HAS A TEMPORARY RESTRAINING ORDER THAT PREVENTS ME FROM HOLDING HER ACCOUNTABLE ON HER JOB"**

Ex. C.

Defendant had both actual and constructive knowledge of the terms of the injunction issued against him by the Order. As explained below, Hoagland willfully violated the Order.

II. **Hoagland's willful violation of the Order**

Defendant violated the express terms of the Order. On June 21, 2016, Mayor Bennett, the Town Council of Hilton Head, and others received an email from Hoagland that directly violated the Order. The e-mail states, among other things, that ". . . I REPEAT, SHE [referring to Likins] IS A LIAR AND ***UNFIT FOR*** HER ROLE ON THE COUNCIL OR ***HER PRIVATE SECTOR JOB***." Ex. 1, Aff. of Likins, at ¶ 12 and Ex. I thereto (double emphasis added). This e-mail directly violates all three of the excerpted provisions of the Order.

Additionally, in further direct violation of the Order, on Sunday June 26, 2016, Defendant published a full page advertisement in the Island Packet newspaper that included accusations that violated the Order. *See* Ex. 1, Aff. of Likins, at ¶ 13 and Ex. J. The advertisement states that it was paid for by Skip Hoagland. *See id.* The ad includes the following statement:

> After I challenged ***Kim Likins, whom I think is unfit to work her day job with boys and girls***, on her actions and called her employer to inform them of her actions as a public official, she schemed with other council members and town lawyers to pass an outrageous resolution to file lawsuits against citizens that make public speeches they don't like.

Id. (double emphasis added). This advertisement, written and paid for by Hoagland, directly violates all three of the excerpted provisions of the Order.

III. Attorneys' fees

The South Carolina Supreme Court has made clear that attorney's fees are recoverable in a civil contempt proceeding as an indemnification to the party who was forced to bring a contempt proceeding:

> In a civil contempt proceeding, a contemnor may be required to reimburse a complainant for the costs he incurred in enforcing the court's prior order, including reasonable attorney's fees. The award of attorney's fees is not a punishment but an indemnification to the party who instituted the contempt proceeding. Thus, the court is not required to provide the contemnor with an opportunity to purge himself of these attorney's fees in order to hold him in civil contempt. See Whetstone v. Whetstone, 309 S.C. 227, 420 S.E.2d 877 (Ct. App. 1992) (court properly awarded wife attorney's fees incurred as the result of husband's contempt); 17 Am.Jur.2d Contempt § 241 (it is within the trial court's discretion to award reasonable attorney's fees to the prevailing party in a civil contempt proceeding); A.S. Klien, Annotation, Allowance of Attorney's Fees in Civil Contempt Proceedings, 43 A.L.R.3d 793 (1972); see also Curlee v. Howle, supra; Golden v. Gallardo, 295 S.C. 393, 368 S.E.2d 684 (1988) (attorney's fees are recoverable in post-divorce litigation concerning visitation and support of parties' minor children).

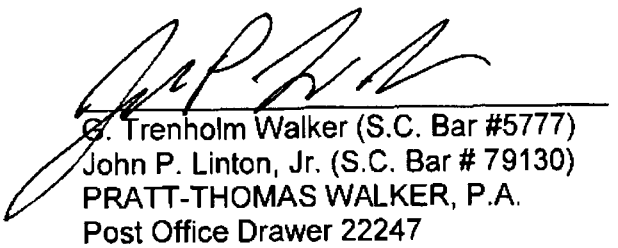
Poston, at 114, 502 S.E.2d at 90.

Plaintiff is entitled to an order requiring Hoagland to pay the fees incurred in enforcing the Order. The fees and costs associated with the contempt proceeding will be submitted via affidavit.

CONCLUSION

For the reasons discussed above, the Court should find Hoagland in contempt, issue an order requiring Hoagland to comply with the Order, require Hoagland to pay attorneys' fees and costs incurred with respect to this contempt proceeding, and any further relief this Court deems appropriate and necessary to ensure future compliance.

Respectfully submitted,



G. Trenholm Walker (S.C. Bar #5777)
John P. Linton, Jr. (S.C. Bar # 79130)
PRATT-THOMAS WALKER, P.A.
Post Office Drawer 22247
Charleston, SC 29413-2247
843.727.2200
Email: gtw@p-tw.com
Email: jpl@p-tw.com

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

ATTORNEYS FOR PLAINTIFF

Charleston, South Carolina
September 7, 2016

State of South Carolina) Court of Common Pleas
) 14th Judicial Circuit
County of Beaufort) No.: 2015-CP-07-2937

Kim Lykins,

Plaintiff,

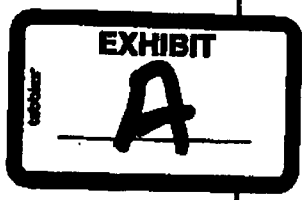
vs.

C.C. Hoagland,

Defendants.

HEARING

December 11, 2015



Hearing reported by Deborah S. Thomas, Certified Verbatim Reporter and Notary Public in and for the State of South Carolina; said hearing held before the Honorable Marvin H. Dukes, III, Beaufort County Master in Equity and Special Circuit Court Judge in accordance with the South Carolina Rules of Civil Procedure, at the Beaufort County Courthouse, 102 Ribaut Road, Room 212, Beaufort, South Carolina, on December 11, 2015, at the hour of 8:38 a.m.

THOMAS REPORTING SERVICES
156 Argent Way
Bluffton, South Carolina 29909
(803) 206-7390

COPY

Appearances

Representing the Plaintiffs:

GREGORY MILAM ALFORD, ESQUIRE
Alford & Thoreson, LLC
Post Office Drawer 8008
Hilton Head Island, South Carolina 29938
gregg@alfordlawsc.com

GEORGE TRENHOLM WALKER, ESQUIRE
Pratt-Thomas Walker, PA
Post Office Drawer 22247
Charleston, South Carolina 29413-2247
gtw@p-tw.com

Representing the Defendants:

TAYLOR MERIWETHER SMITH, IV, ESQUIRE
Harrison & Radeker, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
taylor@harrisonfirm.com

CONTENTS

Hearing

	Page
Exhibit Index	4
Certificate of Reporter	23
Word Index	

* * * * *

EXHIBIT INDEX

Exhibits: Marked at Page

(None were proffered.)

* * * * *

This hearing is taken in accordance with the South Carolina Rules of Civil Procedure.

JUDGE DUKES: Good morning. We are here on 2015-CP-07-2937. This is Lykins versus Hoagland. This matter comes before me, I believe, pursuant to the rules associated with a T.R.O. without notice, emergency T.R.O., however, I see that Mr. Alford, as is my preferred practice, has done his best to contact the Defendant so that we don't have a situation where the other side is not represented even in these type of situations. Mr. Alford, I'm happy to hear from you, sir.

MR. ALFORD: Good morning, Your Honor. May it please the Court, Gregg Alford on behalf of Ms. Lykins. You know, Your Honor, this is -- this is going to be a tough one. Ms. Lykins' background, although you have probably gleaned it from the pleadings but just for the record Ms. Lykins is a member of the Hilton Head Island Town Council.

And in her -- the course of her political service or her public service there have been an issue that has arisen involving a contract with the Chamber of Commerce.

Mr. Hoagland, the defendant, is an

extremely vocal opponent of anything to do with the Chamber of Commerce. There have been a series of processes which recently resulted in a contract being adopted with the Chamber of Commerce. Mr. Hoagland has appeared at almost every meeting. He has continually -- he's very strong in his opinions, and we respect his right to have those opinions in a public forum. We totally do as it relates to Ms. Lykins' public service.

After a vote was taken that Mr. Hoagland didn't agree with, he has -- well, he has for years, Your Honor, engaged in a -- what I would call a hate -- a course of conduct that is a hate campaign, e-mails to people. And they get -- they've escalated. And they've gone from attacks on issues to personal attacks. And now we have a personal attack against Ms. Lykins at her place of work.

Ms. Lykins is the director of the Hilton Head Island Boys and Girls Club. And what has happened, and I've attached the affidavit of Michael Briggs and of Marty Lick who are volunteer Board members for -- one of them is for the Boys and Girls Club of the Low Country which I guess oversees the Hilton Head Island Boys and Girls Club, the Northern Beaufort County Boys and Girls Club, and the

Bluffton Boys and Girls Club.

So what Mr. Hoagland has essentially done is he's called these people and e-mailed them extensively and said because Kim Lykins didn't vote the way I wanted her to on a political issue, she's a liar and she's not fit to serve and fit to be around children.

So we've crossed now into this interference with contract and harassment. And he's threatened to take out ads that will say that, Ms. Lykins isn't fit to work at the Boys and Girls Club, thereby damaging Ms. Lykins and damaging the Boys and Girls Club, frankly, all over this issue that is strictly related to her public service.

Now, we've been very careful in trying to craft our request for an injunction in that we respect and believe in one's right to disagree in political speech. We are not after that. I just want to be clear. We are looking for something narrowly tailored to stop Mr. Hoagland from contacting Ms. Lykins because he's spewed some hate at her, sent her some terrible e-mails.

We also want him to stop contacting members of the Boys and Girls Club Board regarding Ms. Lykins' appointment. He don't want him -- we

would like to prevent him from having published any derogatory, negative, untrue statements about Ms. Lykins as they relate to her employment at the Boys and Girls Club.

And I need to be real clear here, Your Honor. If he wants to take out an ad -- and by the way, he does it regularly, takes out a full page ad in the Island Packet and trashes politicians. That is fine. If he wants to take one out tomorrow, which we think he might since it's Saturday, and trash Ms. Lykins as a politician, me as a lawyer, and my birddog, whatever, that is fine, but I think what we are trying to protect here is her employment, her right to contract, and frankly the Boys and Girls Club from the harm that is spilling over.

And if you read the e-mails, Your Honor, the vitriol is pretty intensive and it's getting worse. We tried -- I've contacted Mr. Smith last night and I know the Court's preferred practice. I didn't want to come in here without having some opportunity for them to be heard. We attempted to serve Mr. Hoagland twice last night. He was forewarned by the security guard and magically no one was home.

So anyway, I tried to get him here. I'm seeking a temporary retraining order to prevent him from -- and I laid it out in our motion. It's fairly narrow grounds, Your Honor. And I just -- I want him to stop contacting by telephone or e-mail or in person members of the Board of Directors of the Boys and Girls Club of Hilton Head Island or the Boys and Girls Club of the Low Country about any matter having to do with the employment of Kim Lykins, to be enjoined from publishing or causing to be published any negative or defamatory statements regarding the Plaintiff and her employment, and taking any other actions that are intended to harass, embarrass, or otherwise injure the Plaintiff in her profession.

Again, Your Honor, I want to be clear, and I spoke with Mr. Smith at length about this -- well, length for awhile about that I'm not trying to stifle protected political speech. I am trying to protect my client from inappropriate and unwarranted personal attacks involving her employment. That is all I'm trying to do.

Not much more to it than that. We will litigate out the rest of it over time, but there was a direct threat made that he would continue to

publish these things and that they were going to escalate. And we felt like we had to come to the Court for relief. Be happy to answer any questions the Court may have.

JUDGE DUKES: None right now. Mr. Smith, thank you for being here. I'm happy to hear from you, sir.

MR. SMITH: Thank you, Your Honor. I appreciate that. And I was retained by Mr. Hoagland for the limited purpose of appearing at today's hearing. And that was actually last night. So as Your Honor mentioned, I had to make the trip down here. And I apologize, because I don't practice down here very often, Your Honor, so please don't take this the wrong way, but I'm just curious, Your Honor, as Master in Equity do you receive an order of reference to hear this today or are you a special circuit judge as well? I'm just --

JUDGE DUKES: I'm a special circuit court judge as well.

MR. SMITH: I assumed that was the case. I just wanted to inquire about that. And, Your Honor, just so I'm clear as to our procedural posture today, are we here today to hear a temporary restraining order request with notice provided to us

or is this actually for a preliminary injunction or a temporary injunction?

JUDGE DUKES: Temporary injunction. And what I was mentioning to Mr. Alford and thanking him for doing is my procedure here is if there is any way possible to give the side -- particularly if the other side is represented, notice of it, that is always my preference. So even if I were to issue an order in favor of Mr. Alford's position today, you would still be entitled to the 10-day hearing.

MR. SMITH: Okay.

JUDGE DUKES: This is simply an emergency temporary order situation that, I guess, Mr. Alford is looking for. So this would be without prejudice to you or your client to have the normal hearing that we would have in these situations.

MR. SMITH: Okay, Your Honor. And just so I'm clear on that, that would mean that if he disagrees with this order, this order would not be for the pendency of the matter, but would only be for 10 days?

JUDGE DUKES: Correct.

MR. SMITH: Akin to a temporary restraining order?

JUDGE DUKES: Exactly. Exactly.

MR. SMITH: Okay. All right. Thank you, Your Honor.

JUDGE DUKES: It's somewhat confusing, but I just think this works better to have the other side, if the other side is represented, to have at that representation present from the very start.

MR. SMITH: Right.

JUDGE DUKES: It solves a lot of problems for me, at least.

MR. SMITH: Yes, Your Honor. I understand. Well, Your Honor, I think I'll start with pointing out that here considering either a temporary retraining order or an injunction here would be a rather drastic remedy based upon what has been pled in the summons and complaint.

And we have been warned by our Supreme Court that because it's such a drastic and extraordinary remedy that you are always asked to proceed with caution granting any of these.

And, Your Honor, there is a reason which I'll come to later as to why we rarely ever see T.R.O.s in a case involving defamation and intentional infliction of emotional distress or even public disclosure of private facts.

Your Honor, I'll start with the elements of what they must establish. Here they need to establish that but for Your Honor entering an order today, right now, there will be immediate irreparable harm coming to the Plaintiff.

Your Honor, they need to convince you that it is irreparable because what they can't get from you is what you will later award which would be damages. Meaning that is not the repair they can get. If that was then an injunction here wouldn't be appropriate. Instead it has to be irreparable, that harm, such that whether the harm is reparable as applied to this harm, it must be remedied by you now. That is what makes it irreparable.

And here, Your Honor, I don't think that is the case. And I don't think that it could be irreparable harm that she suffered as of this moment because my client to my knowledge isn't even awake this morning. My client isn't going out and speaking untrue statements to individuals concerning Ms. Lykins, nor does he intend to.

I've advised him during the purposes of my engagement, you are being sued for defamation. Anything you say will likely, concerning this person, be evidence used against you in this

proceeding.

JUDGE DUKES: Well, let me stop you there and ask you a question then, and also stop my phone here. Mr. Alford has -- I've read enough of this to know that your client has a concern having to do with Ms. Lykins' vote on council having to do with the Chamber of Commerce.

And I've read the allegations which may be denied, I don't know, but with regard to contact having to do with her employment. And based on what you just said, it almost sounds like you agree that he's not going to contact anyone with regard to her employment. I understand without giving up anything or admitting anything or anything like that.

I mean, if that is the case should we just take a break for a second and you get with Mr. Alford and let's see if we can reach some sort of consent on that? Is that --

MR. SMITH: I haven't been provided the authority, Your Honor, from my client to negotiate about what will be for the pendency of this matter or 10 days or --

JUDGE DUKES: Well, I can give you time to get him on the telephone. I mean --

MR. SMITH: Well, I think, Your

Honor, what he is most concerned about is any order coming from this court that might construe his First Amendment rights in a way that he can't exercise what would be ordinarily protected speech. And I think he's not here because what is attached to this is a voluminous amount of exhibits with a lot of words.

And much of what is in there are opinion statements regarding that of public concern and her role on town council. To the extent there are any statements even made concerning this Plaintiff, Your Honor, many of those statements that can be verified are simply true, but there is not much of either in there.

And what he hired me to do, Your Honor, was just to make sure that if any order does come today that it is narrowly tailored to effectuate the interests of the Plaintiff and not having untrue statements that harm her reputation said.

So I mean, I would be happy to work with them on that. And if you want to give me a few minutes I will be happy to call my client, but understand that our overarching concern is that there would be a T.R.O. issued because he believes that there is no way this Court can issue a T.R.O.

that is sufficiently narrowly tailored that isn't going to have the heavy presumption against his Constitutionality because what it would require him to do is to stop talking by telephone, email, or in person, to stop publishing or causing to be published.

I mean, these are broad things. And if we can find a way to narrow it such that it is just like an agreement I might can call my client with and have the authority to agree with him, then that would be of the same to us.

JUDGE DUKES: I mean, here is the part that obviously, I guess, concerns the Plaintiff because -- I haven't had an opportunity to study all of this, it's a half-inch thick worth of stuff. But, I mean, the part that stuck out in my mind is there is, at least, an allegation that there was contact with her employer at the Boys and Girls Club saying she's not fit to be around children.

Now, that may be completely denied. I don't know, but I guess I'm trying to figure out where the protected speech would be there unless there is actually some allegation that would have to do with children. You know? I mean, it's that sort of thing that I think if I understood Mr. Alford's

argument correctly -- if I understand Mr. Alford's argument correctly they don't -- well, they might care, but they aren't trying to restrain him from taking out full page articles, from showing up at council, from doing whatever is necessary and saying -- and exercising his First Amendment rights.

And she's a public official. You know, she made a terrible decision. You can say it over and over again. That certainly is protected speech and I think Mr. Alford, based on his argument, agrees with that. It's the allegation I guess that the line is crossed when one contacts the employer not about the political issue, but very personally about this person shouldn't have contact with children.

And I guess I'm trying to figure out how that is protected speech. And, again, without issuing an order, why don't you all talk for a second because I think you are saying the same thing. Yeah, I don't think they are even asking for a broad order saying he can't complain about these issues with the Chamber of Commerce. Of course he can and should if he has a concern about it.

MR. SMITH: If you are right about that is what the Plaintiff wants, Your Honor,

because I was retained so late last night, I was operating based upon their motion. And their motion is far broader than what Your Honor just characterized. So I was just -- if that is not what they are going for, which is the publishing or causing to publish any negative statements --

JUDGE DUKES: No. You can't stop that. I agree with you. Why don't we do this. I had, like all of these emergency things, I slip it in between other things. I've got something else at 9:00. I can leave you all here. I can go back across the hall, deal with that one in my other room, and then let you call Mr. Hoagland and see what sort of authority you've got and see if you all can craft something. Is that --

MR. ALFORD: As Your Honor knows, I'm always willing to try that. I just want to say one thing. These two affidavits that were filed, one is the affidavit of Mark Lick. Mr. Lick is the Boys and Girls of the Low Country guy.

JUDGE DUKES: Right.

MR. ALFORD: He recites the exact contact that he had that indicated, he was calling me to demand that Kim Lykins, the executive director of the Hilton Head Island Boys and Girls Club be

fired from her position because she was a liar and was unfit to be around children.

JUDGE DUKES: I saw that.

MR. ALFORD: Exact same words in Mr. Briggs' affidavit.

JUDGE DUKES: Uh-huh.

MR. ALFORD: And I just want Your Honor to -- here is the stuff that -- you are absolutely correct about the -- I think we might be trying to talk about the same thing, but this e-mail November 23rd to everybody including -- well, to Ms. Lykins and to the other council members, you both lied and are not fit to serve. I will look forward to speaking directly to both of you soon at public comment.

Also, you will be in my full page ads to publically disgrace you both to this island. Kim, you are not fit to serve Boys and Girls as well. You fully know what you did.

The line for me is the employment. And I thought I tailored my motion, but I just want to make that point, Your Honor. We will work to --

JUDGE DUKES: Well, the implication and why wouldn't -- one shouldn't be around children is a little alarming too, but why don't you all talk

and see what you can figure out. And, again, it sound like you all don't necessarily disagree on the broad strokes of the thing. So why don't we do this. Why don't we be in recess for about 30 minutes. And if we need longer, we need longer. No problem, but I think we've got this room as long as we need it. And I'll just go across the hall and do my other things until you all tell me you are ready to get back on the record.

MR. ALFORD: Okay. Thank you.

MR. SMITH: Thank you.

(RECESS 8:55 TO 9:31.)

JUDGE DUKES: All right. We are back on the record in 15-2937 after a brief recess. My understanding is counsel has spoken and have come to an accommodation that resolves today's issue. And Mr. Smith is going to put that on the record. Happy to hear from you, sir.

MR. SMITH: Thank you, Your Honor. The Defendant in this matter, C.C. "Skip" Hoagland, has come to an agreement with the Plaintiff in this case that for the pendency of this matter the Defendant will not do the three following things.

One, he will not publish any statement to any third party about the Plaintiff's employment at

the Boys and Girls Club. Second, he will not refer to the Plaintiff's fitness in her job at the Boys and Girls Club or her fitness to be around children. And third, the Defendant will not refer to the Plaintiff's employment at the Boys and Girls Club in any statement to a third party. That is the extent of the agreement.

JUDGE DUKES: All right. Thank you. Mr. Alford, is that your agreement as well?

MR. ALFORD: Yes, Your Honor. Thank you. It is exactly what he stated.

JUDGE DUKES: Okay. All right then. Can I ask one of you to prepare that order? Who would like to prepare the order?

MR. ALFORD: Mr. Linton will be happy to do that as soon as he gets back to Charleston. And he will forward it to Mr. Smith for his review and then to the Court.

JUDGE DUKES: Fantastic. Just get it to Heather with an affirmation that everyone has seen it and that kind of thing and I will sign it as quickly as possible. All right. Thank you both and all for resolving the issue and good luck to you in the future of the case. Anything else for the record?

MR. ALFORD: Nothing for the record. Thank you, Your Honor.

JUDGE DUKES: All right. Thank you. That completes the record.

(Whereupon, the hearing was concluded at 9:32 a.m.)

Certificate of Reporter

I, Deborah S. Thomas, Certified Verbatim Reporter and Notary Public in and for the State of South Carolina, do hereby certify that I reported the hearing of Lykins v. Hoagland, on the 11th day of December, 2015: and that the foregoing 22 pages constitute a true and correct transcription of the said hearing.

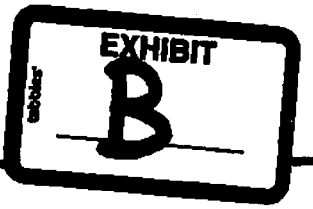
I further certify that I am neither attorney nor counsel for, nor related to or employed by, any of the parties connected with this action, nor am I financially interested in said cause.

I further certify that the original of said transcript shall be hereafter delivered to JOHN P. LINTON, JR., ESQUIRE, Pratt-Thomas Walker, P.A., 16 Charlotte Street (29403), Post Office Drawer 22247, Charleston, South Carolina 29413

In witness whereof I set my hand and seal this 1st day of July, 2016.

Deborah S. Thomas, CVRM
and Notary Public for the
State of South Carolina

My Commission
expires 1/4/18



John Linton

From: Jim Brown Law <jimbrownlaw@hargray.com>
Sent: Friday, March 25, 2016 3:40 PM
To: Gregg Alford
Cc: Trenholm Walker; John Linton
Subject: Attachment Email 3 for RFP-Likins v. Hoagland
Attachments: Speeches-1.pdf; Speeches-2.pdf; Speeches-3.pdf

These are typed documents from Mr. Hoagland for his town council speeches.

Jessica Roper
Paralegal to Jim Brown

Law Offices of Jim Brown, P.A.
1600 Burnside Street, Suite 100
P.O. Box 592
Beaufort, SC 29901
Office: (843) 470-0003
Fax: (843) 470-0004

MAYOR /COUNCIL:

FIRST I WANT TO BE CLEAR – KIM, YOU AND OTHERS ARE NOT VICTIMS. / OUR COMMUNITY IS THE VICTIM OF CORRUPTION AND LIES / ALLOWING THIS CHAMBER TO ESCAPE AN AUDIT & FOIA / NOW YOU ATTEMPT TO SHOOT THE MESSENGERS OF FACTS! CRIMINAL.

I'M HERE TODAY TO ADDRESS MYSELF PRIMARILY TO KIM LIKINS.

BUT I HOPE THE REST OF YOU WILL PAY CLOSE ATTENTION, TO THIS MOST IMPORTANT SPEECH TO YOU.

AS YOU KNOW, MS. LIKINS HAS A TEMPORARY RESTRAINING ORDER THAT PREVENTS ME FROM HOLDING HER ACCOUNTABLE ON HER JOB / PLEASE NOTE – JEFF MOSS, SUPERINTENDENT OF SCHOOLS

WHO MANY SAID NOT FIT TO LEAD SCHOOLS, BOYS & GIRLS / BY HIM SETTING A BAD EXAMPLE.

SO NOW, WE GO TO COURT.

I LOOK FORWARD TO THAT/ AS MANY KNOW -- WHO IS RIGHT IN THIS MATTER.

PUBLIC COMMENTS TO THE PACKET ARTICLE POINT OUT THE REASON SHE FILED / COUNCIL IS AFRAID OF ME AND MY FIGHT FOR TRANSPARENCY.

MS. LIKINS HAS GOOD REASON TO BE AFRAID, BECAUSE I'M HERE TODAY TO TELL HER -- CLEARLY -- THAT MY LAWYERS ARE GOING TO PUT HER THROUGH THE TOUGHEST DEPOSITION SHE HAS EVER IMAGINED / LOTS OF DISCOVERY / INCLUDING PHONE RECORDS.

AND KIM, YOU'LL BE UNDER OATH -- AND PENALTY OF PERJURY.

MY LAWYERS WILL MAKE SURE IF THERE'S ANYTHING YOU HAVE DONE THAT MIGHT RAISE QUESTIONS

ABOUT YOUR HONESTY AND INTEGRITY WILL BE QUESTIONED -- INCLUDING YOUR BIG LIE ABOUT HOW YOU "LISTENED CAREFULLY" TO ALL OF THE PUBLIC COMMENTS BEFORE YOU AND 3 OTHER COUNCIL CO-CONSPIRATORS / VOTED FOR THE TERRIBLE, CORRUPTED INEXCUSABLE "DRAFT CHAMBER CONTRACT". ALSO BASED ON LIES AND DECEIT.

ALSO KIM, YOUR VOTE DID NOT COUNT BECAUSE OF CONFLICT AND IF YOU TELL THAT LIE OR ANY OTHER LIE DURING YOUR DEPOSITION, YOU WILL BE PROSECUTED. IF I WERE YOU, I'D THINK HARD ABOUT YOUR LAWSUIT.

YOUR DISPUTE WITH ME RELATES TO YOUR PRIVATE SECTOR JOB, REPRESENTED BY TOWN ATTORNEY ALFORD -- AT TAXPAYER EXPENSE. THIS TAXPAYERS ABUSE WILL NOT BE ALLOWED.

IN EXECUTIVE SESSION, THIS COUNCIL WILL DISCUSS HAVING MR. ALFORD REPRESENT ANY OF YOU WHO ALSO CHOOSE TO VIOLATE CONSTITUTIONAL RIGHTS OF FREE SPEECH. BE CAREFUL AND WATCH MAYOR SULKA RESULTS.

SO I SAY TO ALL OF YOU, I CANNOT BE SILENCED OR STOPPED. REASON IS SIMPLE.
I'M ON THE RIGHT SIDE AND YOU'RE ON THE WRONG.

SO, IN THE SPIRIT OF THE HOLIDAYS, I'M STRONGLY ENCOURAGE YOU / SEE THE LIGHT / ACT ACCORDINGLY / FIND INTEGRITY AND COURAGE. YOU WERE ALL ELECTED TO SERVE THE PUBLIC INTEREST, NOT CROOKS AND THIEVES OF PUBLC MONEY.
TIME IS RUNNING OUT FOR YOU TO COME TO YOUR SENSES BEFORE ITS TOO LATE.

LAST THOUGHT, LEE ITS NOT ABOUT THE NICE PEOPLE OF THE CHAMBER BOARD, ITS THE CHAMBER DICTATORS THAT HAVE ABUSED, TRICKED AND FOOLED THEM AND YOU. NO ONE HAS SEEN THE BOOKS/ MONEY. IF ANYONE QUESTIONS BILL MILES & DAIVD TIGGES, THEY WILL BE SILENCED AS YOU WERE MAYOR / NEXT YEAR A NEW LAWSUIT AGAINST THIS CHAMBER / CHAMBER IRS TAX VIOLATIONS / CHAMBER REVOLT / DEMAND FAIR ELECTIONS FOR MEMBERS / UNFAIR COMPETITIVE PRACTICES TO MEDIA.

MERRY CHRISTMAS AND HAPPY NON-CORRUPT NEW YEAR.

THANK YOU.

CERTIFICATE OF SERVICE

I hereby certify that I have served true copies of the **Plaintiff's Memorandum of Law in Support of Motion to Hold Defendant in Contempt** and **Affidavit of John P. Linton, Jr.** via U.S. mail in accord with applicable Rules of Civil Procedure on this 7th day of September, 2016:

James A. Brown, Jr., Esq.
Law Offices of Jim Brown, PA
PO Box 592
Beaufort, SC 29901
jimbrownlaw@hargray.com
notguilty@hargray.com

Barrett R. Brewer, Esq.
Christopher W. Nickels, Esq.
Clawson & Staubes, LLC
126 Seven Farms Drive, Suite 200
Charleston, SC 29492-8144
bbrewer@clawsonandstaubes.com
cnickels@clawsonandstaubes.com

Nancy Jane Dennis
Paralegal to John P. Linton, Jr.

Charleston, South Carolina

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT	)	CASE NUMBER: 2015-CP-07-02937
	)	
KIM LIKINS	)	
	)	
v. Plaintiff,	)	**DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR A RULE TO SHOW CAUSE AND A PROTECTIVE ORDER**
	)	
C.C. "SKIP" HOAGLAND	)	
	)	
Defendant.	)	

2016 JUL 1 PM 1:42

THE DEFENDANT PRESENTS THIS RESPONSE to the Plaintiff's request for a Rule to Show Cause and a Protective Order in the above captioned matter.

RULE TO SHOW CAUSE

The Defendant objects to any contempt finding.

Lack of Personal Jurisdiction:

To begin, the Defendant objects to the Court's exercise of personal jurisdiction over him regarding any contempt proceedings. See Bakala v Bakala, 576 SE2d 156 (SC 2003). To properly vest jurisdiction in a constructive contempt proceeding, an accused must be served a Rule to Show Cause based upon a petition accompanied by support information. Id. Without this document, the Court can not assert jurisdiction over a contempt claim.

Insufficient Notice of Nature of Contempt Proceeding:

Further, should the Plaintiff's Motion be interpreted as requesting a civil contempt finding, the Defendant has not been apprized of what actions he may take to purge himself of any contempt allegations.

Also, to the extent the Plaintiff's Motion seeks a criminal contempt finding, the Defendant asserts all of his rights commensurate with the defense of a criminal allegations. The Defendant expressly asserts all of his criminal trial rights under both the US and SC

Constitutions. Specifically, but not as limitation, the Defendant requests a jury trial as allowed by law as well as the rights of confrontation, to counsel, to assert a defense, to the presumption of innocence, to compulsory process, and to the application of the proof beyond a reasonable doubt standard.

It is clear that criminal contempt proceedings trigger protections commensurate with a traditional criminal matter when the contempt alleged is constructive contempt. Ex Parte Jackson, 672 SE2d 585 (SC Ct App 2009). Under the federal constitution, a jury trial is required if the contempt punishment exceeds six months as the Sixth Amendment requires a jury in all trials involving a "serious crime." State v Passmore, 611 SE 273 (SC Ct App 2003)(internal citations omitted).

To the extent the SC Constitution extends the jury trial protection even further, such a request is made pursuant to Article I, Section 14 of the SC Constitution.

Issue on the Merits

The Defendant did not willfully violate a court order. For one to be found in contempt of court, the court must find that a party willfully disobeyed a court order. Wilfulness in this context means that a party performed an act voluntarily and intentionally with the specific intent to violate a court order. Here, as developed following the presentation of the evidence by the accuser, the Defendant took affirmative, wilful and deliberate steps to comply with the Court's previous ruling, as he understood that ruling.

It must be mentioned at this time, that the final, signed order which the Defendant is accused of violating was never served upon the Defendant or his counsel until the Plaintiff served undersigned a copy along with the Motion seeking the Rule to Show Cause.

To the extent any of these factual assertions are contested, the Defendant asserts his right to confront his accusers in open court under examination as well as the opportunity to present his defense as allowed by law.

MOTION FOR A PROTECTIVE ORDER

The Court should reject any protective order to the extent such an order would constitute a prior restraint upon the Defendant's speech and redress of grievance rights under the US and SC Constitutions. At a minimum, prior restraints on speech are disfavored; however, it has been suggested that prior restraints of any kind are not allowed by law. "Injunctions in Defamation Cases"; Professor Erwin Chemerinsky, Syracuse Law Review, Vol. 57, page 157 (2007). To the extent that any prior restraint in this case has been issued with the consent of the Defendant, that consent is hereby withdrawn as the Defendant does not desire to waive any of his rights to free speech, expression or to redress grievances as protected by law.

CONCLUSION

Thus, the Defendant objects to any contempt proceedings or findings of consent as outlined above. The Defendant similarly objects to the issuance of any protective order as well as the continuation of any temporary restraining order based upon his consent.

Respectfully submitted by:

James A. Brown, Jr.

July 11, 2016

Beaufort, SC

CERTIFICATE OF SERVICE
I hereby certify that a copy of this document
was served upon all counsel of record in this proceeding
this 11th day of July, 2016.

2016 JUL 11 PM 1:41
JEAN ANN ROSEHEAU
BEAUFORT COUNTY, S.C.
CLERK OF COURT

Law Offices of Jim Brown, P.A.

1600 Burnside St., Suite 100 • P.O. Box 592
Beaufort, SC 29901-0592
Phone: (843) 470-0003 Fax: (843) 470-0004
jimbrownlaw@hargray.com
www.attorneyjimbrown.com

2016 JUL 11 PM 1:42
JEANNE ANN ROSEMEAU
BEAUFORT COUNTY, S.C.
CLERK OF COURT

July 11, 2016

VIA HAND DELIVERY
Clerk
Beaufort County Clerk of Court
PO Box 1128
Beaufort, SC 29901

Re: Kim Likins v. C.C. "Skip" Hoagland; 2015-CP-07-02937

Clerk:

Under cover of this letter please find enclosed Defendant's Response to Plaintiff's Motion for a Rule to Show Cause and a Protective Order for filing in your office. Thank you for your attention to this matter. Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Jessica Roper

Jessica Roper
Paralegal to Jim Brown

cc: Gregory M. Alford, Esquire, via US Mail and Email
G. Trenholm Walker, Esquire, via US Mail and Email
John P. Linton, Esquire, via US Mail and Email

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT	)	CASE NUMBER: 2015-CP-07-2937
	)	
KIM LIKINS	)	
	)	**NOTICE OF MOTION AND MOTION**
Plaintiff,	)	**FOR RULE TO SHOW CAUSE, TO**
v.	)	**HOLD DEFENDANT IN CONTEMPT**
	)	**OF COURT, FOR PROTECTIVE**
C. C. "SKIP" HOAGLAND	)	**ORDER, AND TO SHORTEN TIME**
	)	
Defendant.	)	
	)	

2016 JUN 29 PM 3:02
JOANN ANN ROSENEAU
BEAUFORT COUNTY, S.C.
CLERK OF COURT

YOU WILL PLEASE TAKE NOTICE that Plaintiff Kim Likins ("Plaintiff"), by and through her undersigned attorneys will move, as soon as counsel may be heard, for the Court to issue a Rule to Show Cause; for an Order holding Defendant C.C. "Skip" Hoagland ("Defendant" or "Hoagland") in contempt of court for violating the Consent Order on Plaintiff's Motion for Temporary Injunction filed December 21, 2015 (the "Order"); and for a protective order, pursuant to 26(c), SCRCP, precluding Hoagland from the following: (1) personally contacting witnesses or potential witnesses, (2) harassing witnesses or potential witnesses, (3) using any information discovered during the discovery process for the purpose of harassing any third-parties, or (4) using any information discovered during the discovery process for any purpose unrelated to the lawsuit. Plaintiff further moves that the applicable time periods for the hearing of a motion be shortened to allow for this hearing to take place based on the urgent reasons set forth below.

The motion is supported by the Verified Complaint; the affidavits on file; the Affidavit of Plaintiff Kim Likins, attached as Exhibit 1; and the Affidavit of Michael G. Briggs, attached as Exhibit 2.

RELEVANT BACKGROUND AND PROCEDURAL HISTORY

On December 10, 2015, Plaintiff filed a Verified Complaint against Hoagland asserting, among other things, that Hoagland is waging a persistent campaign of verbally abusing, defaming, and threatening Plaintiff and taking other action to harm Plaintiff. Verified Complaint, at ¶6. Plaintiff is a member of the Hilton Head Island Town Council. She is employed in the private sector as the executive director of the Boys & Girls Club of Hilton Head Island. *Id.* at ¶¶ 4-5. Hoagland has attacked Plaintiff's private life and her private sector employment by, among other things, publishing false statements to third-parties (including members of the Board of Directors of her employer) and falsely stating that Plaintiff is unfit for her employment with the Boys & Girls Club of Hilton Head Island. *Id.* at ¶ 6.

Plaintiff filed a Motion for a Temporary Injunction with the Verified Complaint. The motion was supported, in part, by the Affidavit of Michael G. Briggs, the President of the Board of Directors of the Boys & Girls Club of Hilton Head. *See* Aff. of Briggs filed Dec. 10, 2015, at ¶ 2. In that affidavit, Mr. Briggs explained in detail that Hoagland had contacted him and called for Plaintiff to be terminated from her job:

> On December 2, 2015, I received a telephone call from an individual who identified himself as "Skip Hoagland". Mr. Hoagland indicated that he was calling me to demand that Kim Likins, the Executive Director of the Hilton Head Island Girls and Boys Club, be fired from her position because she was a liar and was unfit to be around children.

Id. at ¶ 3. The Court entered an Order, with the consent of the parties, resolving the Motion for Temporary Injunction. The Order provides that for the duration of the lawsuit or further order of the court:

1. Defendant will not publish any statement to any third party about Plaintiff's employment at the Boys and Girls Club.

2. Defendant will make no statement to any third party referring to Plaintiff's fitness for her job or her fitness to be around children.

3. Defendant will not refer to Plaintiff's employment with the Boys and Girls Club in any statements made to a third party.

Order. As explained below, Hoagland has violated the Order and has abused the discovery process.

DISCUSSION

Defendant has violated the express terms of the Order. On June 21, 2016, Mayor Bennett, the Town Council of Hilton Head, and others received the attached email from Hoagland, attached hereto as Exhibit I. The e-mail states, among other things, that ". . . I REPEAT, SHE [referring to Likins] IS A LIAR AND ***UNFIT FOR*** HER ROLE ON THE COUNCIL OR ***HER PRIVATE SECTOR JOB***." Ex. 1, Aff. of Likins, at ¶ 12 and Ex. I thereto (double emphasis added). This e-mail directly violates all three of the excerpted provisions of the Order.

Additionally, in further direct violation of the Order, on Sunday June 26, 2016 a full page advertisement was published in the Island Packet newspaper. *See* Ex. 1, Aff. of Likins, at ¶ 13 and Ex. J. The bottom of the advertisement states that the advertisement is paid for by Skip Hoagland. *See id.* The ad includes the following statement:

> After I challenged ***Kim Likins, whom I think is unfit to work her day job with boys and girls***, on her actions and called her employer to inform them of her actions as a public official, she schemed with other council members and town lawyers to pass an outrageous resolution to file lawsuits against citizens that make public speeches they don't like.

Id. (double emphasis added). This advertisement, paid for by Hoagland, directly violates all three of the excerpted provisions of the Order.

Hoagland has further violated the Order by directly contacting members of the Board of Directors of the Boys & Girls Club of Hilton Head, confronting them for their support of Likins, harassing them, and calling Likins a liar. *See* Ex. 2, Aff. Briggs, ¶ 4-8 and Exs. A-G thereto.

The Court should issue a Rule to Show Cause concerning Hoagland's breaches of the Order, requiring Hoagland to appear and show cause why he should not be held in contempt for violating the Order. The Court should then hold Hoagland in contempt for the violations discussed above. The contempt order should require Hoagland to comply with the Order and pay Plaintiff's attorneys' fees and costs for having to enforce the Order.

In addition to violating the Order, Defendant has used the discovery process for an improper purpose. On June 6, 2016, Likins produced 295 pages of documents in response to Plaintiff's first set of requests for production, which included a request for "any and all documents, emails, texts, recordings, notes, reports, photographs or any other tangible objects or the like concerning the Defendant." Ex. 1, Aff. of Likins, ¶ 5. Between June 19 and June 21, Likins was forwarded e-mails that were sent from Hoagland to several third-parties confronting and harassing those individuals. *See id.* ¶ 6-11 and Exs. B-H thereto. Hoagland's e-mails to these individuals harassing them about e-mails Likins produced in discovery process are inappropriate and an abuse of discovery.

The Court should issue a Protective Order, pursuant to Rule 26(c), SCRCP to prevent Hoagland's abuse of the discovery process in improperly misusing the documents produced by Likins outside the confines of the case to pester witnesses. Specifically, the Court should enter a protective order precluding Hoagland from the following: (1) harassing witnesses or potential witnesses, (2) using any documents or information discovered from Likins during the discovery process outside the confines of this litigation (3) using any documents or information discovered from Likins during the discovery process for the purpose of harassing any third-parties, or (4) using any information discovered during the discovery process for any purpose unrelated to the lawsuit. Rule 26(c) specifically provides that for good cause shown, the court "make any order which justice requires to protect a party or person from annoyance, embarrassment, oppression, or undue burden by expense." *See* S.C. R. Civ. P. 26(c). Here, a protective order is necessary to protect Plaintiff from the annoyance and oppression caused by Hoagland harassing third-parties and abusing the discovery process.

CONCLUSION

For the reasons discussed above, the Court should issue a Rule to Show Cause; hold Hoagland in contempt for the violations of the Order; issue an order requiring Hoagland to comply with the Order, pay Plaintiff's attorneys' fees and costs for having to enforce the Order, and any further relief this Court deems appropriate and necessary to ensure future compliance. Additionally, the Court should issue a protective order as requested above to prevent future abuse and misuse of documents and information produced by Likins for an improper purpose outside the scope of this case.

The undersigned certifies that consultation with opposing counsel regarding this motion would serve no useful purpose.

Respectfully submitted,

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

G. Trenholm Walker (S.C. Bar #5777)
John P. Linton, Jr. (S.C. Bar # 79130)
PRATT-THOMAS WALKER, P.A.
Post Office Drawer 22247
Charleston, SC 29413-2247
843.727.2200
Email: gtw@p-tw.com
Email: jpl@p-tw.com

ATTORNEYS FOR PLAINTIFF

Charleston, South Carolina
June 27, 2016

EXHIBIT 1

STATE OF SOUTH CAROLINA COUNTY OF BEAUFORT Kim Likins, Plaintiff, v. C. C. "Skip" Hoagland, Defendant.	IN THE COURT OF COMMON PLEAS FOURTEENTH JUDICIAL CIRCUIT CASE NO.: 2015-CP-07-2937 **AFFIDAVIT OF KIM LIKINS**

Personally appeared before me Kim Likins, who being duly sworn, testifies as follows:

1. I offer this Affidavit as testimony, under oath and under penalty of perjury, stating and affirming that I have personal knowledge of the facts set forth herein, that I am competent to testify to the matters set forth herein, and that all statements included herein are truthful and accurate.
2. My name is Kim Likins. I am over the age of eighteen.
3. I am the Plaintiff in this action, which was filed on December 10, 2015. I also filed a Motion for Temporary Injunction on that date.
4. On December 21, 2015, the parties filed a Consent Order on Plaintiff's Motion for Temporary Injunction, attached hereto as Exhibit A. The Consent Order provides in pertinent part as follows:

    1. Defendant will not publish any statement to any third party about Plaintiff's

    employment at the Boys and Girls Club.

2. Defendant will make no statement to any third party referring to Plaintiff's fitness for her job or her fitness to be around children.

3. Defendant will not refer to Plaintiff's employment with the Boys and Girls Club in any statements made to a third party.

5. On June 6, 2016, I produced 295 pages of documents in response to Plaintiff's first set of requests for production, which included a request for "any and all documents, emails, texts, recordings, notes, reports, photographs or any other tangible objects or the like concerning the Defendant."

6. On June 19, 2016, Pat Wirth forwarded an email to me dated June 19, 2016 from Defendant C. C. "Skip" Hoagland ("Hoagland") to her, a true and accurate copy of which is attached hereto as Exhibit B.

7. On June 19, 2016, Sandy West forwarded an email to me received on June 19, 2016 from Hoagland to Pam Freedman and her, a true and accurate copy of which is attached hereto as Exhibit C.

8. On June 20, 2016, Sandy West forwarded two emails to me dated June 19, 2016 from Hoagland to Lisa Sulka and her, a true and accurate copy of which are attached hereto as Exhibit D and Exhibit E.

9. On June 19, 2016, Sandy West forwarded an email to me dated June 19, 2016 from Hoagland to her, a true and accurate copy of which is attached hereto as Exhibit F.

10. On June 20, 2016, Jim Magruder forwarded an email to me dated June 19, 2016 from Hoagland to him, a true and accurate copy of which is attached hereto as Exhibit G.

11. On June 21, 2016, Frank Babel forwarded an email to me dated June 19, 2016 from Hoagland to him, a true and accurate copy of which is attached hereto as Exhibit H.

12. On June 21, 2016, Mayor Bennett, the Town Council of Hilton Head, and others received the attached email from Hoagland, a true and accurate copy of which is attached hereto as Exhibit I. The e-mail states among other things that ". . . I REPEAT, SHE [referring to me] IS A LIAR AND UNFIT FOR HER ROLE ON THE COUNCIL OR HER PRIVATE SECTOR JOB."

13. On Sunday June 26, 2016 a full page advertisement was published in the Island Packet newspaper, a true and accurate copy of which is attached hereto as Exhibit J. The bottom of the advertisement states as follows: "AD PAID FOR BY SKIP HOAGLAND." The ad includes the following statement:

> After I challenged Kim Likins, whom I think is unfit to work her day job with boys and girls, on her actions and called her employer to inform them of her actions as a public official, she schemed with other council members and town lawyers to pass an outrageous resolution to file lawsuits against citizens that make public speeches they don't like.

FURTHER AFFIANT SAYETH NOT.

Kim Likins

Sworn this 29th Day of June 2016

GREGORY M. ALFORD
Notary Public, State of South Carolina
My Commission Expires 3/17/2026

Notary Public for _____

My Commission Expires: _____

EXHIBIT A

STATE OF SOUTH CAROLINA COUNTY OF BEAUFORT KIM LIKINS, Plaintiff, v. C. C. "SKIP" HOAGLAND, Defendant.	)	IN THE COURT OF COMMON PLEAS FOURTEENTH JUDICIAL CIRCUIT CASE NUMBER: 2015-CP-07-2937 **CONSENT ORDER ON PLAINTIFF'S MOTION FOR TEMPORARY INJUNCTION**

2015 DEC 21 PM 3:06
BERRI ANN ROSS
BEAUFORT COUNTY, S.C.

This matter came before the Court on December 11, 2015 on Plaintiff's Motion for Temporary Injunction and to Shorten Time Period. Gregory M. Alford and John P. Linton, Jr. appeared on behalf of the Plaintiff Kim Likins. Taylor M. Smith, IV appeared on behalf of Defendant C.C. "Skip" Hoagland for the limited purpose of representing the Defendant at the December 11, 2015 hearing. The Defendant has not been served with the Summons and Complaint. At the hearing, counsel conferred about the motion and reached the following agreement, which was put on the record in open court and is now memorialized in this Consent Order:

1. Defendant will not publish any statement to any third party about Plaintiff's employment at the Boys and Girls Club.

2. Defendant will make no statement to any third party referring to Plaintiff's fitness for her job or her fitness to be around children.

3. Defendant will not refer to Plaintiff's employment with the Boys and Girls Club in any statements made to a third party.

The parties have agreed and the Court hereby **ORDERS** that the Defendant is **RESTRAINED** and **ENJOINED** as set forth above. Furthermore, as agreed by the

1 of 2

753

12/21/15 2:58pm

parties, the Court **ORDERS** that this injunction will remain in effect for the pendency of this action or until further order of the Court. Finally, the parties have also agreed this agreement and consent order shall not be admissible at the trial in this matter to prove liability for or the invalidity of the Plaintiff's claim or amount.

AND IT IS SO ORDERED.

The Honorable Marvin H. Dukes, III
Master-In-Equity

Beaufort, South Carolina
December 21, 2015 2:08 pm

WE CONSENT:

G. Trenholm Walker (S.C. Bar #5777)
John P. Linton (S.C. Bar # 79130)
PRATT-THOMAS WALKER, P.A.
Post Office Drawer 22247
Charleston, SC 29413-2247
843.727.2200
Email: gtw@p-tw.com
Email: jpl@p-tw.com

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

WE CONSENT:

Taylor M. Smith, IV
Andrew S. Radeker
HARRISON & RADEKER, P.A.
PO Box 50143
Columbia, SC
(803) 779-2211
(803) 779-6700 (facsimile)
taylor@harrisonfirm.com
drew@harrisonfirm.com
ATTORNEYS FOR DEFENDANT

2 pg

STATE OF SOUTH CAROLINA)
) IN THE COURT OF COMMON PLEAS
COUNTY OF BEAUFORT) FOURTEENTH JUDICIAL CIRCUIT
)
) CASE NO.: 2015-CP-07-2937
KIM LIKINS)
Plaintiff,) **MOTION AND ORDER INFORMATION FORM AND COVERSHEET**
vs.)
)
C. C. "SKIP" HOAGLAND)
Defendant.)

2015 DEC 21 PM 3:06
JEAN ROSENEAU
BEAUFORT COUNTY, S.C.
CLERK OF COURT

Plaintiff's Attorney:	Defendant's Attorney:
John P. Linton, Bar No. 79130 Address: 16 Charlotte Street Charleston, SC 29403 Phone: 843-727-2200Fax 843-727-2239 E-mail: jpl@p-tw.comOther: ____	TAYLOR M. SMITH, IV, Bar No. ____ Address: PO BOX 50143 COLUMBIA, SC Phone: 803-779-2211 Fax803-779-6700 E-mail: taylor@harrisonfirm.comOther: ____

☐ **MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)**
☐ **FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)**
☒ **PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)**

SECTION I: Hearing Information

Nature of Motion: ____
Estimated Time Needed: ____ Court Reporter Needed: ☐ YES/☐ NO

SECTION II: Motion/Order Type

☐ Written motion attached
☒ Form Motion/Order
I hereby move for relief or action by the court as set forth in the attached proposed order.

Signature of Attorney for ☒ Plaintiff /☐ Defendant — 12/18/2015 Date submitted

SECTION III: Motion Fee

☐ PAID – AMOUNT: $____
☐ EXEMPT: (check reason)
☐ Rule to Show Cause in Child or Spousal Support
☐ Domestic Abuse or Abuse and Neglect
☐ Indigent Status ☐ State Agency v. Indigent Party
☐ Sexually Violent Predator Act ☐ Post-Conviction Relief
☐ Motion for Stay in Bankruptcy
☐ Motion for Publication ☐ Motion for Execution (Rule 69, SCRCP)
☒ Proposed order submitted at request of the court; or,
reduced to writing from motion made in open court per judge's instructions
Name of Court Reporter: ____
☐ Other: ____

JUDGE'S SECTION	
☐ Motion Fee to be paid upon filing of the attached order. ☐ Other: ____	JUDGE CODE ____ Date: ____

CLERK'S VERIFICATION

Collected by: ____ Date Filed: ____
☐ MOTION FEE COLLECTED: $ ____
☐ CONTESTED – AMOUNT DUE: $ ____

SCCA 233 (11/2003)

PRATT-THOMAS | WALKER
ATTORNEYS AT LAW
PROFESSIONAL ASSOCIATION

16 CHARLOTTE STREET
CHARLESTON, SC 29403

PO DRAWER 22247
CHARLESTON, SC 29413-2247

PHONE: 843.727.2200
FAX: 843.727.2238

WWW.P-TW.COM

JOHN P. LINTON, JR.
Email: jpl@p-tw.com
Direct: (843) 727-2252

2015 DEC 21 PM 3:06
BEAUFORT COUNTY, S.C.

December 18, 2015

The Honorable Marvin H. Dukes, III
Master-in-Equity
Beaufort County Courthouse
P.O. Box 1228
Beaufort, SC 29901-1228

Re: Kim Likins v. C. C. "Skip" Hoagland
Case No.: 2015-CP-07-2937

Dear Judge Dukes:

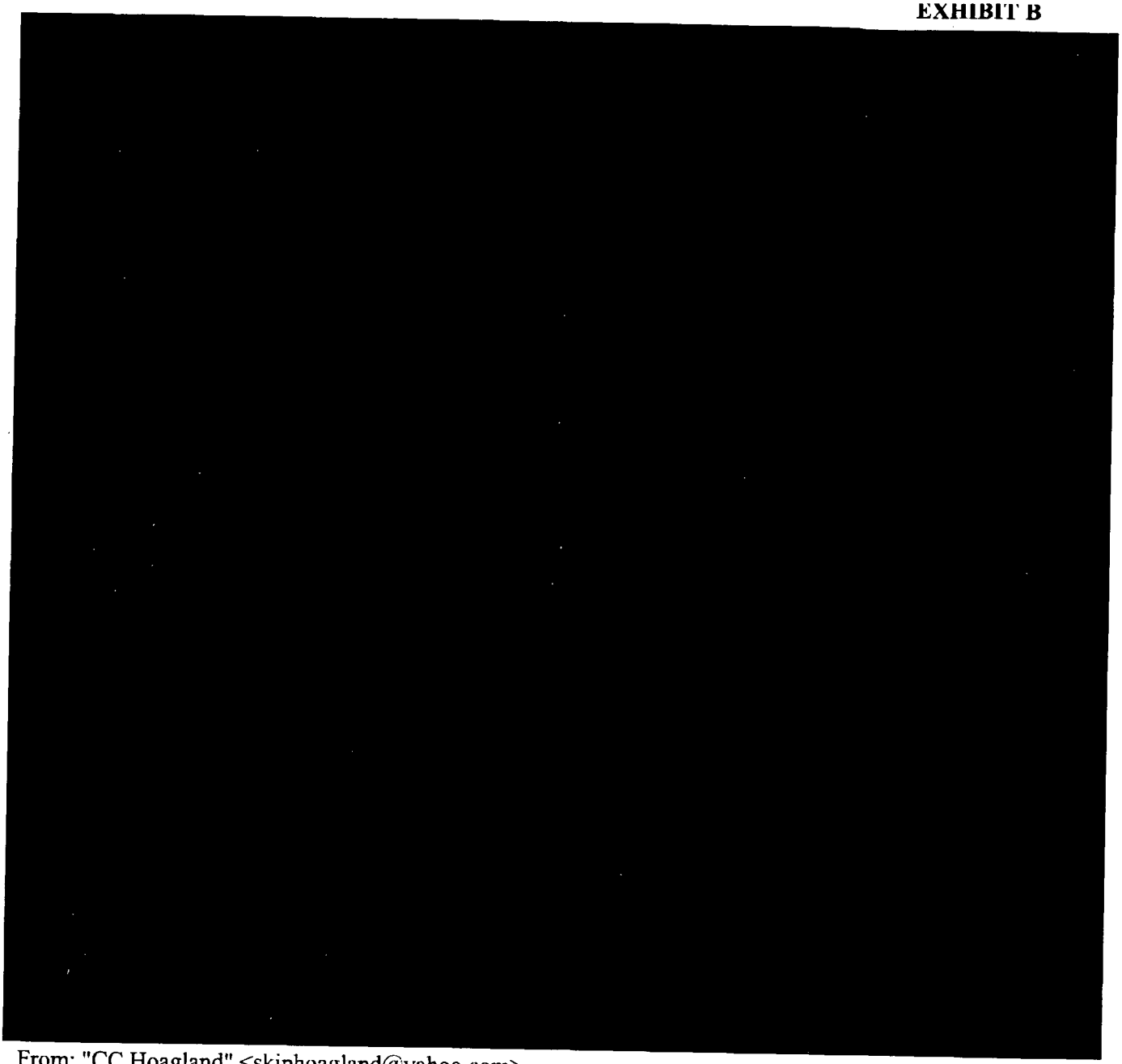
Enclosed please find the proposed Consent Order on Plaintiff's Motion for Temporary Injunction in the above referenced matter. If it meets with your approval, please sign the Order and forward it to the Clerk of Court. Also enclosed is a cover slip.

Thank you for your consideration. Please contact me if you have any questions.

Sincerely,
PRATT-THOMAS WALKER, P.A.

John P. Linton, Jr.

JPL/cam
Enclosures
c: Taylor M. Smith, IV (w/encl.)
Andrew S. Radeker, Esq. (w/encl.)
Gregory M. Alford, Esq. (w/encl.)



From: "CC Hoagland" <skiphoagland@yahoo.com>
Date: Jun 19, 2016 4:56 PM
Subject: Kim has involved you in her lawsuit
To: <patwirth@habitathhi.org>
Cc: "Jim Brown Jim Brown Lawyer" <jimbrownlaw@hargray.com>

Pat are you aware Kim lied on video and I have done nothing but tried to force what's right, transparency and accountibility. At 68 yrs old I highly suggest you guide your mighty girls to follow strong honest men and woman who fight to stop corruption. If you want a better world for your daughters I suggest you join me not deny reality. Kim Likins lawsuit is frivolous and based on nothing but trying to silence facts and truth. Facts are facts and always true. Thanks

From: Pat Wirth <patwirth@habitatnh.org>
Sent: Saturday, December 12, 2015 10:10 AM
To: Kim Likins
Subject: Unacceptable

Hi Kim,

I'm away for a couple of days of R&R and logged on to read the Island Packet....and then saw the news about the lawsuit you've had to file.

Please know that I believe you were absolutely right to take such action and support you completely. Such bullying is simply not OK. To go to your Board chair absolutely crossed the line and I'm so glad you responded to stop him.

I talk to my granddaughters all the time about being Mighty Girls. I'll think about you next time the girls and I have that conversation!

Pat

Sent from my iPhone excuse all typos and misspellings

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

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed.

If you have received this email in error please notify the originator of the message.

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

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

EXHIBIT C

[redacted]

From: "CC Hoagland" <skiphoagland@yahoo.com>
To: "pgfreedman@aol.com" <pgfreedman@aol.com>, "sandy west" <sandy@swest-lighthouse.com>
Cc: "Jim Brown Jim Brown Lawyer" <jimbrownlaw@hargray.com>
Subject: Kim Likins lawsuit

Pam in this email you call me an idiot and not respected ? Can you explain both these and what I did wrong ? I repeat kim Likins lied I did not ? Does this mean I am an idiot and not respected to force truth and transparency ?

[image1.jpeg]

Sent from my iPhone excuse all typos and misspellings

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

idea that I do a lot for the Club. Well, anyway, my hangup but i do want to see the Wexford girls and this is perfect opportunity to see a lot in one fell swoop.

POOR KIM. OMG. This article today. Hoagland is an idiot and so not respected. I DON'T THINK MIKE BRIGGS SAID IT STRONG ENOUGH in his quote about her contributions and her not being fit for being with children.

I AM THINKING ABOUT CRISIS MGMT here and want to be involved in Board dialogue. I very very much hope it is not first on agenda so I can contribute. I feel we should be very aggressive in promoting Kim and I don't know how much we acknowledge Hoagland at all. This comes before our gala and our cap campaign and I PERSONALLY AM DISGUSTED WITH HOAGLAND THAT HE WOULD DRAG HER REPUTATION AND HER COMMITMENT THRU THE MUD.

I think we have to be aggressive and halt this slander campaign. I want to be a part of the dialogue. I did not think Mike was strong enough, Sandy. In person we can talk more. Thurs is my best day early afternoon, late lunch.

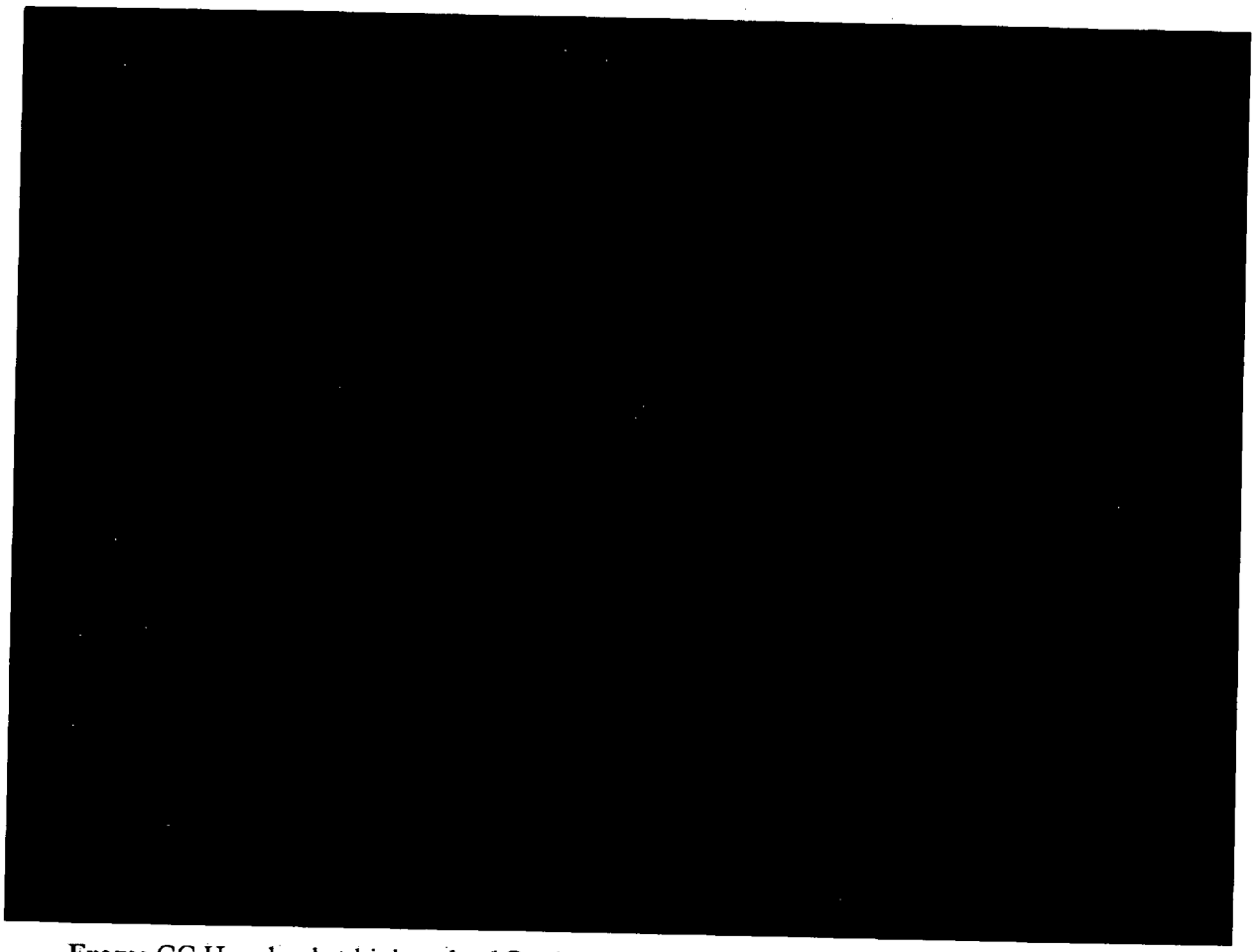
Or call. I'm on cell. Good luck in controlling Exec committee.

Love you Kim, love you Sandy. xxl

On Dec 12, 2015, at 5:34 PM, sandy west <sandy@swest-hhhouse.com> wrote:

did you get my response?
Can't do Wed....will you be at the board meeting?
Miss you!
XOXO

Sandy West



From: CC Hoagland <skiphoagland@yahoo.com>
Date: June 19, 2016 at 6:26:05 PM EDT
To: sandy@swest-lighthouse.com
Subject: Fwd: Failure Notice

Sandy I sent all to wrong email sorry I will resend.

Sent from my iPhone excuse all typos and misspellings

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

Begin forwarded message:

From: MAILER-DAEMON@yahoo.com
Date: June 19, 2016 at 4:48:53 PM EDT
To: skiphoagland@yahoo.com
Subject: Failure Notice

Sorry, we were unable to deliver your message to the following address.

<sandy@sweet-lighthouse.com>:
No MX or A records for sweet-lighthouse.com

--- Below this line is a copy of the message.

Received: from [98.137.12.191] by nm16.bullet.mail.gq1.yahoo.com with NNFMP; 19 Jun 2016 20:48:53 -0000
Received: from [98.136.164.78] by tm12.bullet.mail.gq1.yahoo.com with NNFMP; 19 Jun 2016 20:48:53 -0000
Received: from [127.0.0.1] by smtp240.mail.gq1.yahoo.com with NNFMP; 19 Jun 2016 20:48:53 -0000
X-Yahoo-Newman-Id: 678428.54369.bm@smtp240.mail.gq1.yahoo.com
X-Yahoo-Newman-Property: ymail-3
X-YMail-OSG: 0RE3AXQVM1kjnlsGjO.5NiukhuIoXodnBw7o34Ro_xiffU9
iSVwxXEHs1BN5fpRK4t9clU6uM.uQoRPmPRMClOPTa1aPGij5kyh8QRS8n_f
krc9Ts5FkzSQahWNi4U49oKQQIujBk8mK9m4H3nY6QaF3zZSocXnI.r1P09W
qvdWN5j_Q1u1HUj7GDSlNcZApTaD7MLBfYmjg.CZCGHSDZr8P6yEyjShfZs
I
RMCgPG5npGhm_DaWbXJVm4FpBvd9g1KbZaI8Grt.2H4sxDdm3VghI27UhS
Up
zKsYZwwoxg_K388RD0xQPl35hW9EMHoEt4Be00fcRgjx8GBJwN.5JorxXFj_
hjpSVtc3oQf43XhsdIWpy3GVpHkaHeDsqEqfvo_SiS92X2IG6_Jrwm4qjQ2l
MzOpCY7sJXfvw2nm.CKxbT6yWDx2Tw44YBRkONShvepOsvdfs1RsVCmB
MdW5
ECkkGc93zYw4xqPggIgHMofqkwAhwUrQnLPUhQ2GEJPQi9bHVJqVH20gV
H9e
hBWl8Wwm0KZxIgJK8O..t9OfJefBcJODvcg_V69uNob_d.DEoY40cEpV83eU
-
X-Yahoo-SMTP: SN5CYWCswBBcSwaRmo_bwXm7W1OGCj9YYg--
Content-Type: multipart/alternative;
  boundary=Apple-Mail-25BB8762-E436-4F9E-BC5E-8CACACD643D7
Mime-Version: 1.0 (1.0)
Subject: Re: Kim Likins has now involved you in our lawsuit
From: CC Hoagland <skiphoagland@yahoo.com>
X-Mailer: iPhone Mail (13F69)
In-Reply-To: <E6B22E21-B799-49EA-92DF-09DB8C00ADE2@yahoo.com>
Date: Sun, 19 Jun 2016 16:48:51 -0400
Cc: Jim Brown Jim Brown Lawyer <jimbrownlaw@hargray.com>
Content-Transfer-Encoding: 7bit
Message-Id: <2AA6C94F-9402-46D6-89B3-D31782D8B752@yahoo.com>
References: <E6B22E21-B799-49EA-92DF-09DB8C00ADE2@yahoo.com>
To: sandy@sweet-lighthouse.com

--Apple-Mail-25BB8762-E436-4F9E-BC5E-8CACACD643D7
Content-Type: text/plain;
  charset=us-ascii
Content-Transfer-Encoding: quoted-printable

Who is andrew ? Thanks=20

Sent from my iPhone excuse all typos and misspellings=20

Skip Hoagland / CEO
Domains New Media LLC=20
US cell 843-384-7260
Off. Buenos Aires , Argentina=20
011-54-9-11-5942-3202

On Jun 19, 2016, at 4:46 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:
=20

Lisa are you sure Kim and Sandy are your Godly faithful friends ? Read San=

dy's comments to Kim Likins about you ?

Lisa I have to agree you are not that smart and you like Kim Likins who li=

ed on video who is also not that smart, will not escape from all your abuse t=
o others. You used town employees to sell bill miles Hhi chamber memberships=
that harmed the Greater Bluffton chamber and you have used your position of=
mayor to profit you in realestate. We have all the records of these million=
s in sales and listings. As you already know we have all we need to end this=
abuse and corruption.=20

=20
<IMG_3228.JPG>
=20
=20
Sent from my iPhone excuse all typos and misspellings=20
=20
Skip Hoagland / CEO
Domains New Media LLC=20
US cell 843-384-7260
Off. Buenos Aires , Argentina=20
011-54-9-11-5942-3202
=20
=20

--Apple-Mail-25BB8762-E436-4F9E-BC5E-8CACACD643D7
Content-Type: text/html;

charset=utf-8
Content-Transfer-Encoding: quoted-printable

<html><head><meta http-equiv=3D"content-type" content=3D"text/html;
charset=3D=
utf-8"></head><body dir=3D"auto"> Who is andrew ?
Thanks

Se=
nt from my iPhone excuse all typos and
misspellings
 <div=

<span style=3D"background-color: rgba(255, 255, 255,
0);">Skip Hoaglan=

d / CEO <span style=3D"background-color: rgba(255, 255,
255=
, 0);">Domains New Media LLC <span
style=3D"backgroun=
d-color: rgba(255, 255, 255, 0);">US cell <a href=3D"tel:843-384-7260"
x=
-apple-data-detectors=3D"true" x-apple-data-detectors-type=3D"telephone" x-a=
pple-data-detectors-result=3D"0/1">843-384-7260 <span
s=
tyle=3D"background-color: rgba(255, 255, 255, 0);">Off. Buenos Aires , Argen=
tina <a href=3D"tel:011-54-9-11-5942-3202" x-apple-
da=
ta-detectors=3D"true" x-apple-data-detectors-type=3D"telephone" x-apple-data=
-detectors-result=3D"2" style=3D"background-color: rgba(255, 255, 255, 0); f=
ont-size: 13pt;">011-54-9-11-5942-3202 <div style=3D"font-family:
U=
ICTFontTextStyleBody; font-size: 19px; -webkit-text-size-adjust: auto;">
=

On Jun 19, 2016, at 4:46 PM, CC
Ho=
agland <<a
href=3D"mailto:skiphoagland@yahoo.com">skiphoagland@yahoo.com<=
/a>> wrote:

 <blockquote type=3D"cite"> <meta http-
equiv=3D=
"content-type" content=3D"text/html; charset=3Dus-ascii"> Lisa are you s=
ure Kim and Sandy are your Godly faithful friends ? Read Sandy's comments to=
Kim Likins about you ? Lisa I have to agree you are not that smar=
t and you like Kim Likins who lied on video who is also not that smart, will=
not escape from all your abuse to others. You used town employees to sell b=
ill miles Hhi chamber memberships that harmed the Greater Bluffton chamber a=
nd you have used your position of mayor to profit you in realestate. We have=
all the records of these millions in sales and listings. As you already kno=
w we have all we need to end this abuse and
corruption.

<IMG=
_3228.JPG>

Sent from my iPhone excuse all typos and
mis=
spellings
 <span style=3D"background-color:
rgb=
a(255, 255, 255, 0);">Skip Hoagland / CEO <span
style=3D"ba=

ckground-color: rgba(255, 255, 255, 0);">Domains New Media
LLC <=
/div> <span style=3D"background-color: rgba(255, 255, 255, 0);">US
cell&=
nbsp;<a href=3D"tel:843-384-7260" x-apple-data-detectors=3D"true" x-apple-
da=
ta-detectors-type=3D"telephone" x-apple-data-detectors-result=3D"0/1">843-38=
4-7260 <span style=3D"background-color: rgba(255,
255, 2=
55, 0);">Off. Buenos Aires , Argentina <a
href=3D"tel=
:011-54-9-11-5942-3202" x-apple-data-detectors=3D"true" x-apple-data-detecto=
rs-type=3D"telephone" x-apple-data-detectors-result=3D"2"
style=3D"backgroun=
d-color: rgba(255, 255, 255, 0); font-size: 13pt;">011-54-9-11-5942-3202=
<div style=3D"font-family: UICTFontTextStyleBody; font-size: 19px; -
we=
bkit-text-size-adjust:
auto;">

 </b=
lockquote></body></html>=

--Apple-Mail-25BB8762-E436-4F9E-BC5E-8CACACD643D7--

[redacted]

> From: CC Hoagland [mailto:skiphoagland@yahoo.com]
> Sent: Sunday, June 19, 2016 6:33 PM
> To: sandy west
> Subject: Fwd: Kim Likins has now involved you in our lawsuit
>
> FYI
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland / CEO
> Domains New Media LLC
> US cell 843-384-7260<tel:843-384-7260> Off. Buenos Aires , Argentina
> 011-54-9-11-5942-3202<tel:011-54-9-11-5942-3202>
>
>
>
> Begin forwarded message:
> From: CC Hoagland
> <skiphoagland@yahoo.com<mailto:skiphoagland@yahoo.com>>
> Date: June 19, 2016 at 4:46:33 PM EDT
> To: sandy@sweet-lighthouse.com<mailto:sandy@sweet-lighthouse.com>,
> Lisa Sulka
> <lsulka@townofbluffton.com<mailto:lsulka@townofbluffton.com>>
> Cc: Jim Brown Jim Brown Lawyer
> <jimbrownlaw@hargray.com<mailto:jimbrownlaw@hargray.com>>
> Subject: Kim Likins has now involved you in our lawsuit Lisa are you
> sure Kim and Sandy are your Godly faithful friends ? Read Sandy's comments to Kim Likins about you ?
> Lisa I have to agree you are not that smart and you like Kim Likins who lied on video who is also not that smart, will not escape from all your abuse to others. You used town employees to sell bill miles Hhi chamber memberships that harmed the Greater Bluffton chamber and you have used your position of mayor to profit you in realestate. We have all the records of these millions in sales and listings. As you already know we have all we need to end this abuse and corruption.
>
> [cid:18D0190B-A1EE-4E5C-8467-C2845D10AAD7]
>
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland / CEO
> Domains New Media LLC
> US cell 843-384-7260<tel:843-384-7260> Off. Buenos Aires , Argentina
> 011-54-9-11-5942-3202<tel:011-54-9-11-5942-3202>
>
>
> <IMG_3228.JPG>

From: [redacted]
Sent: Friday, December 11, 2015 4:57 PM
To: Kim Likins
Subject: Re: Planning and Budgeting

Kim,
Really happy for you! I do not have my calendar with me so I will get back to you... Have a good weekend!
XOXO

Sent from my iPhone
Sandy West
Principal - Lighthouse Consulting
Partner - Accelerating Leaders
614.361.8449

On Dec 11, 2015, at 4:19 PM, Kim Likins <Kim.Likins@beclowcountry.org> wrote:

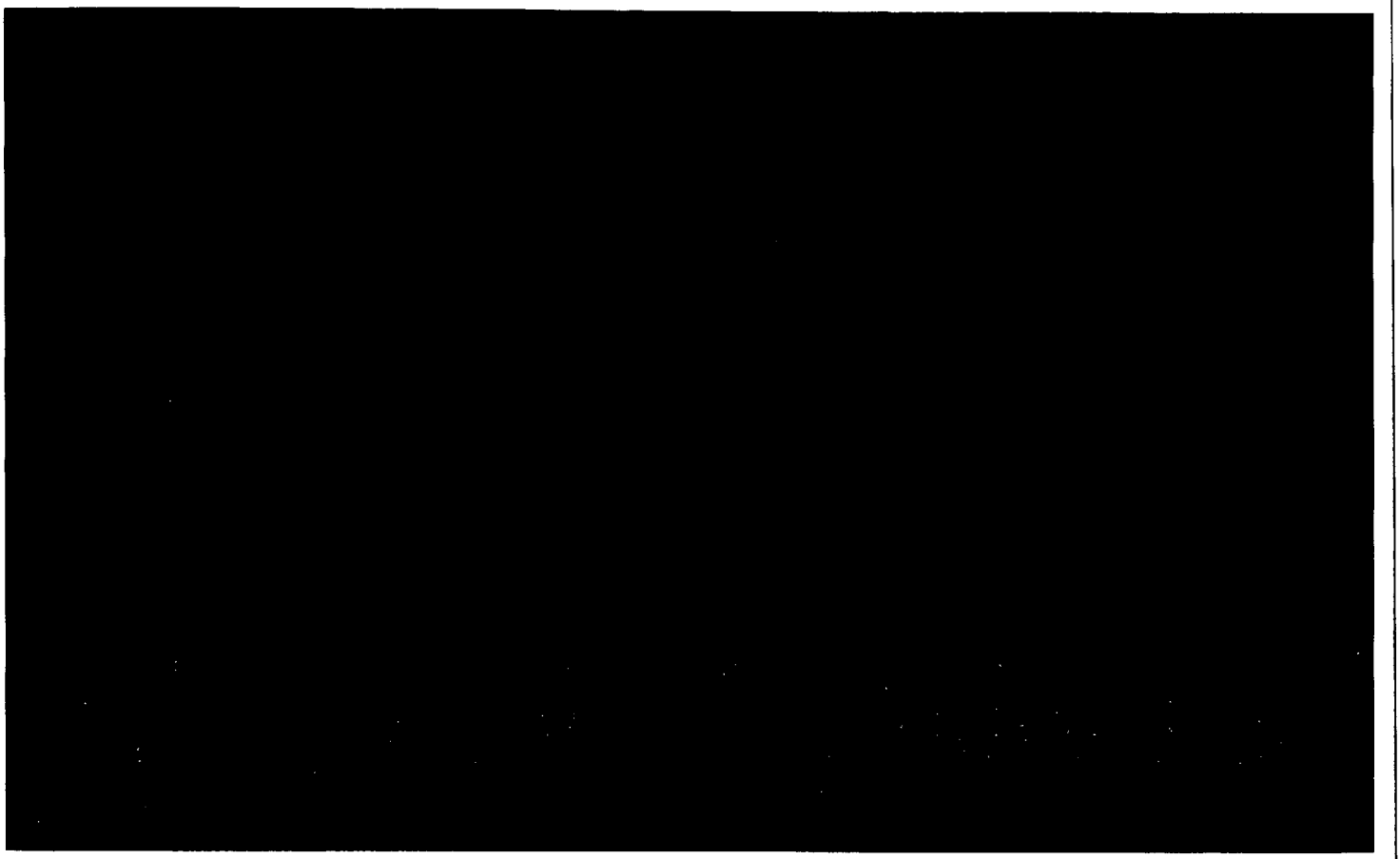
> So happy! Went to court today and got the injunction so Skip can no longer harass BGC!!! Unfortunately, I can't meet Wednesday at lunch. Chris has our leadership Christmas lunch that day at noon. Any other time next week before Friday? We leave for vacation on Friday.
> Thanks,
> Kim
>
> Kim Likins
> Director
> Boys & Girls Club of Hilton Head Island
> 843.715.1725
> Kim.likins@bgclowcountry.org
>
> *Our mission is to enable all young people, especially those who need us most, to reach their full potential as productive, caring, responsible citizens. We are proud to have served the youth of Hilton Head Island for 25 years!*

From: sandy west [mailto:sandy@swest-lighthouse.com]
Sent: Thursday, December 10, 2015 6:35 PM
To: Kim Likins <Kim.Likins@beclowcountry.org>
Subject: Re: Planning and Budgeting

Kim,
Thanks for sharing the email from Lisa.....I totally agree with her comments. Are you ok with me emailing her back with encouragement and letting her know you shared this email with me? As you know, I am not in the loop on any of this and I DO think she is smart, instrumental, etc.
I am glad we connected today.....thanks for filling me in.

1

LIKINS_000150



From: "CC Hoagland" <skiphoagland@yahoo.com>
To: "sandy west" <sandy@swest-lighthouse.com>
Cc: "Jim Brown Jim Brown Lawyer" <jimbrownlaw@hargray.com>
Subject: Kim Likins lawsuit

So sandy you wish death on me ! What God do you pray to ! You can't help yourself ! That's scary ! What exactly have I done to fill your heart with Dom much hatred ?

From: Kim Likins <Kim.Likins@bgclowcountry.org>
Sent: Saturday, January 30, 2016 5:10 PM
To: sandy west
Subject: RE: Gala invitations

We are together on Thursday at 11:30am with James Mallory, correct? Capital Campaign is not until February 15th. I hope I am correct. My schedule is crazy right now. Thank you so much for always sending appointments. That helps so much!

Kim

From: sandy west [mailto:sandy@sweetlighthouse.com]
Sent: Friday, January 29, 2016 7:14 PM
To: Kim Likins <Kim.Likins@bgclowcountry.org>
Subject: Re: Gala invitations

Thanks so much... Sorry for the mix up 😊

I hope Skip fell off the edge of the earth. Ok... Not very Christian like but... I can't help myself.

Super hope you can help celebrate the big guys birthday ... That he wants to forget 😊

Looking forward to seeing you. I guess the next time might be the cap campaign meeting??

Have a great weekend... Hope you can relax!

Xoxo

Sent from my iPhone

Sandy West

Principal, Lighthouse Consulting

Partners - Accelerating Leaders

On Jan 29, 2016, at 3:09 PM, Kim Likins <Kim.Likins@bgclowcountry.org> wrote:

No worries. Looks like we are on for the 18th! Also, I put March 5th on my calendar. Steve and I would

[illegible] My week has been busy but good. No word from Skip at all. So very peaceful. I hope he has

[illegible]

[illegible] Island

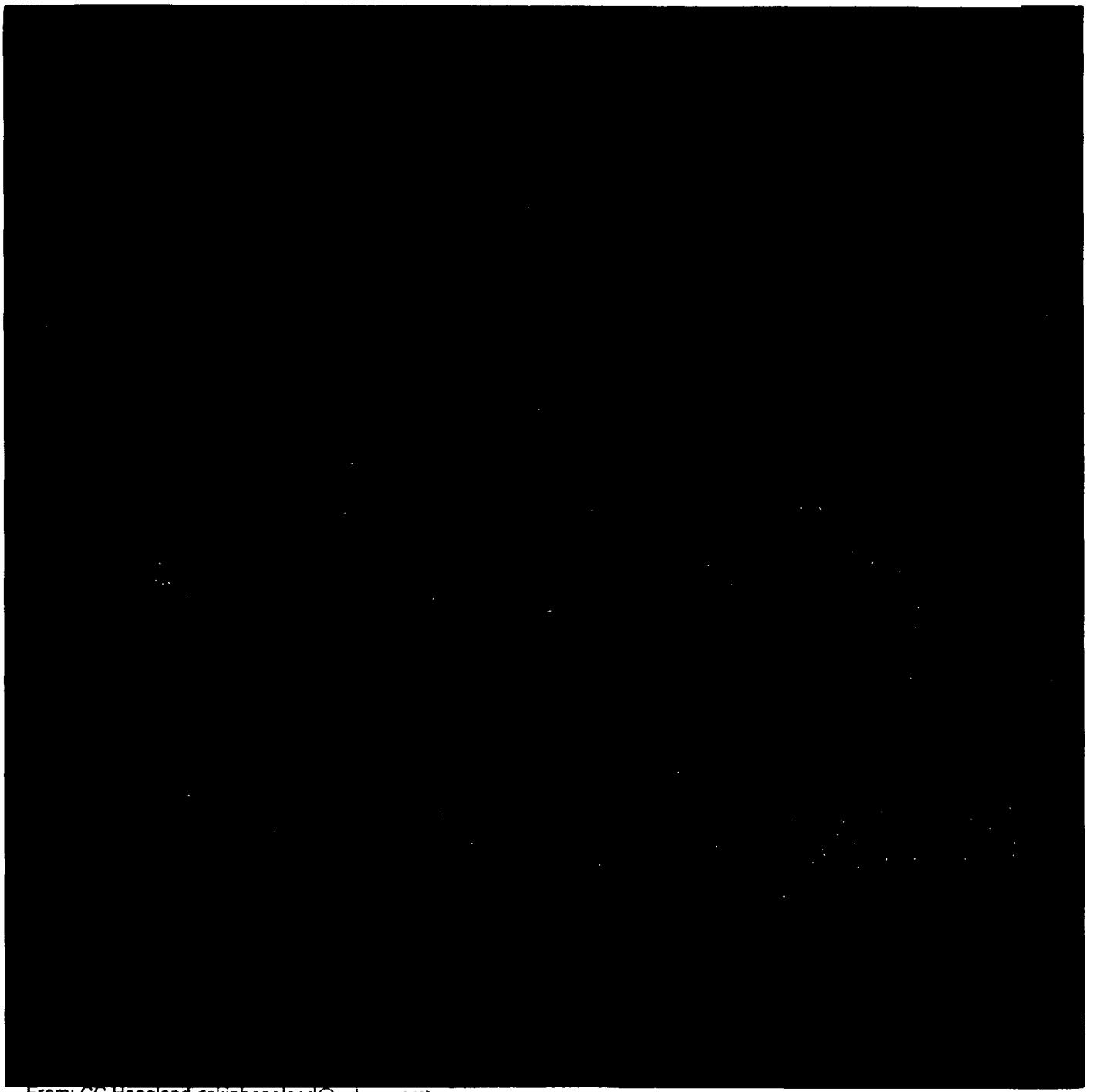
[illegible] students, especially those who need us most, to reach their full [illegible]

[illegible] students. We are proud to have served the youth of Pulaski Island

[illegible]

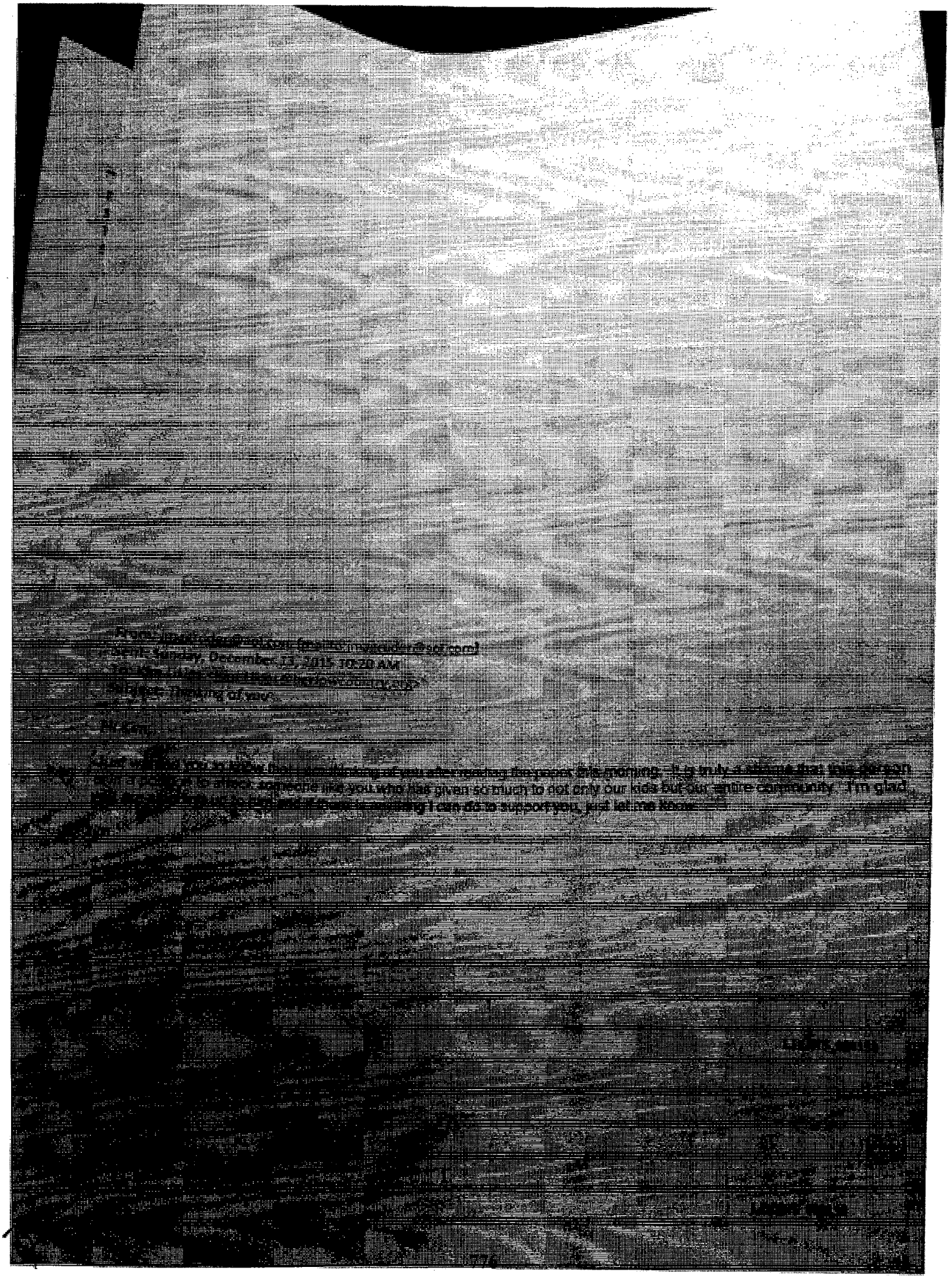
Sent from my iPhone excuse all typos and misspellings

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



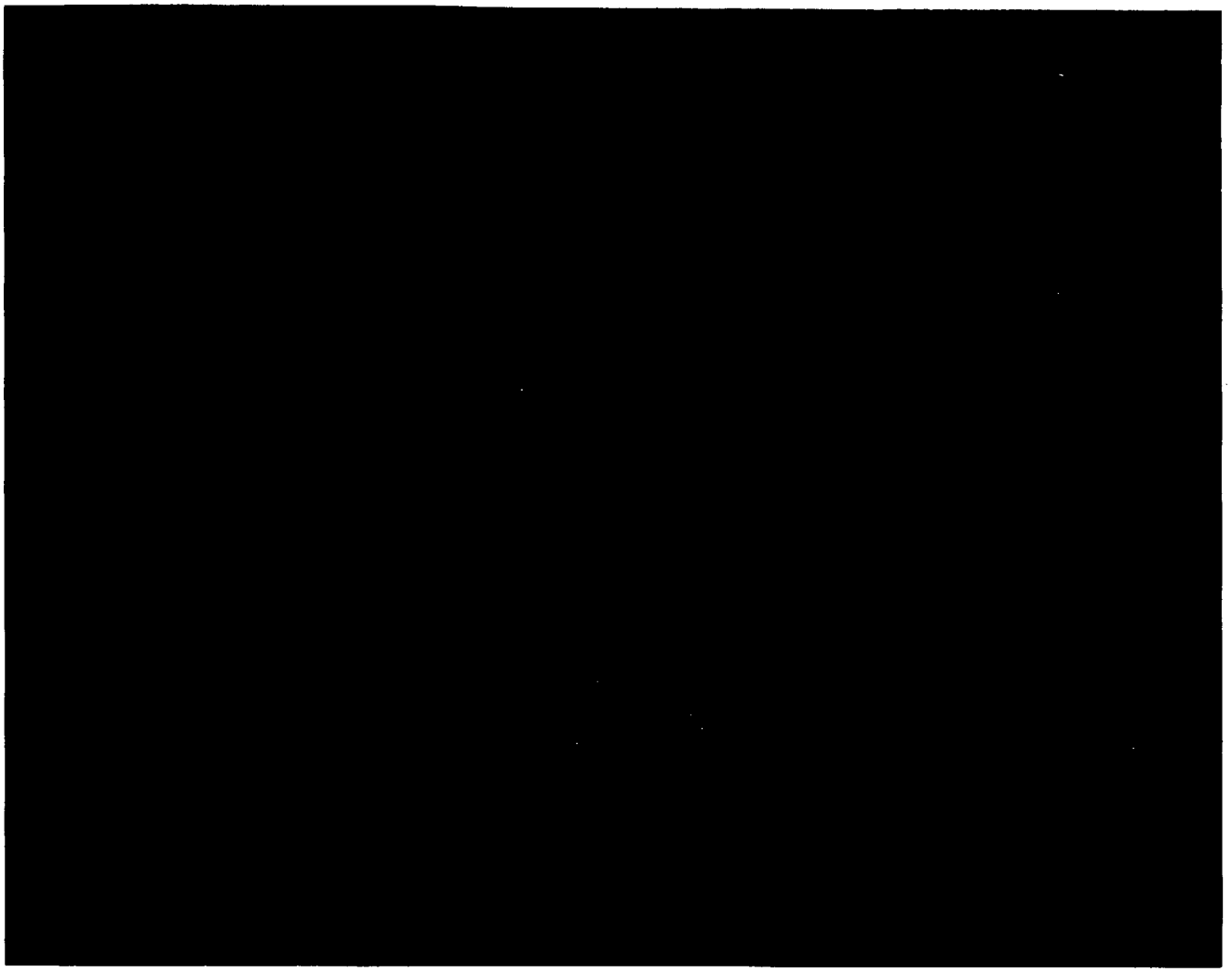
From: CC Hoagland <skiphoagland@yahoo.com>
To: jmagruder <jmagruder@aol.com>
Cc: Jim Brown Jim Brown Lawyer <jimbrownlaw@hargray.com>
Sent: Sun, Jun 19, 2016 7:06 pm
Subject: Kim Likins has involved you in our lawsuit

Jim are you aware I represent facts and done nothing ? Are you aware kim Likins lied on video ?



Sent from my iPhone excuse all typos and misspellings

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



From: skiphoagland@yahoo.com
To: fjbabel@aol.com
Sent: 6/19/2016 7:16:16 P.M. Eastern Daylight Time
Subj: Fwd: Kim Likins has involved you in our lawsuit

Resend typo sorry thx

Sent from my iPhone excuse all typos and misspellings

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

Begin forwarded message:

From: CC Hoagland <skiphoagland@yahoo.com>
Date: June 19, 2016 at 7:09:41 PM EDT
To: fjabel@aol.com

Cc: Jim Brown Jim Brown Lawyer <jimbrownlaw@hargray.com>
Subject: Kim Likins has involved you in our lawsuit

Frank are you aware all I say is true and factual and we have Kim Likins lying on video camera ?
God preaches truth not lies !

From:
Sent:
To:
Subject:

Terence Emile <emilejam@me.com>
Sunday, December 13, 2015 2:32 PM
Kim Likins
Hang in there!

Kim,

Saw the article in the...

From:
Sent:
To:
Subject:

fjbaker@aol.com
Sunday, December 13, 2015 12:59 PM
klikins@readrunner.com
Hang in there

Kim,

You have a world of support behind you. Have faith.

This guy is toxic and creates new meaning to the word obnoxious. He lays waste to civility and while he has his rights, needs to be dealt with a firm hand, no ifs and buts.

The only good news in all this is that our community is totally rallying around you and more than ever appreciates who you are and the good work you do. The same goes to the others he is attacking.

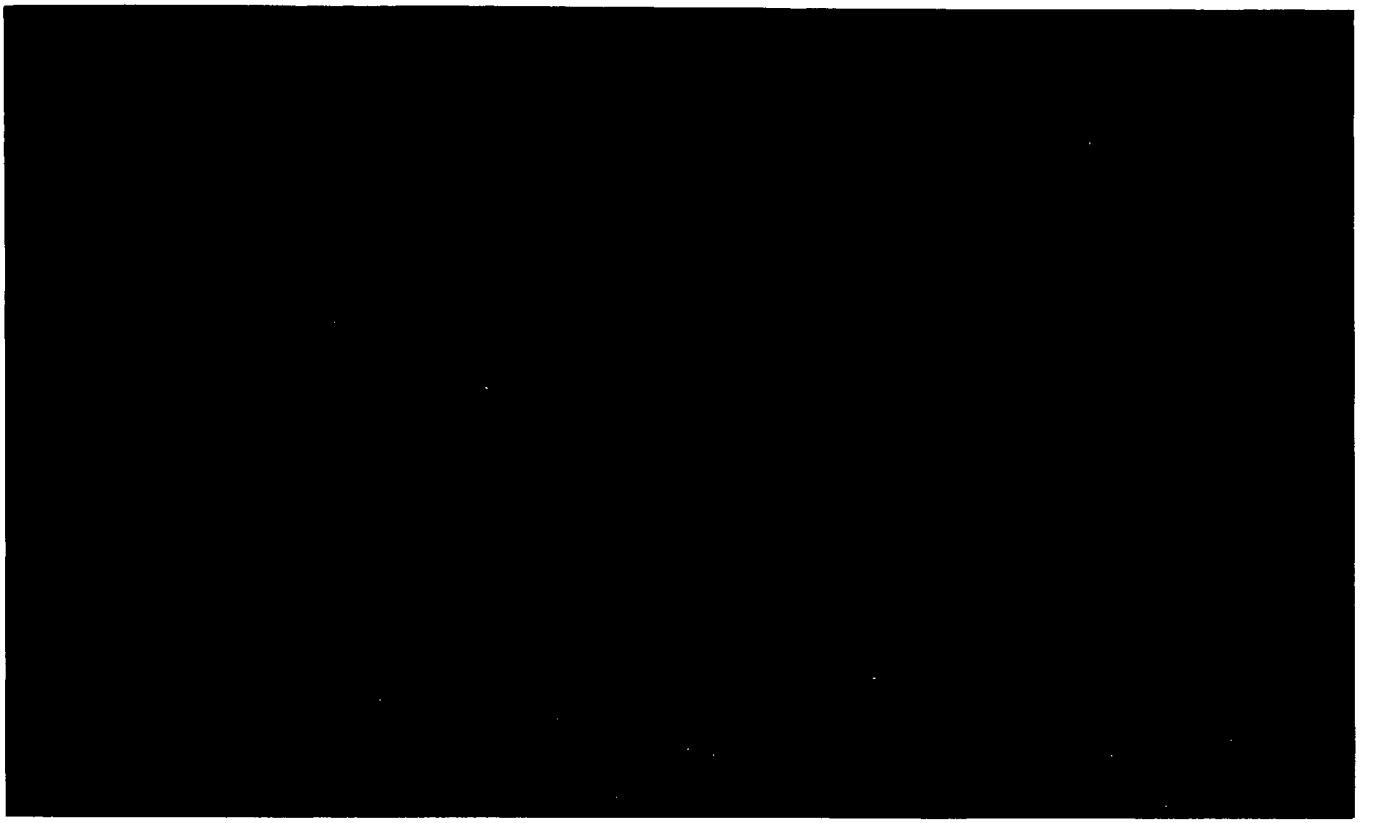
God bless.

Frank

Sent from my iPhone excuse all typos and misspellings

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

=



From: CC Hoagland <skiphoagland@yahoo.com<mailto:skiphoagland@yahoo.com>>
Date: June 21, 2016 at 9:35:26 AM EDT
To: Riley Steve <stever@hiltonheadislandsc.gov<mailto:stever@hiltonheadislandsc.gov>>, Hulbert Brian <brianh@hiltonheadislandsc.gov<mailto:brianh@hiltonheadislandsc.gov>>, Gregg Alford <gregg@alfordlawsc.com<mailto:gregg@alfordlawsc.com>>, <davidb@hiltonheadislandsc.gov<mailto:davidb@hiltonheadislandsc.gov>>, David Ames <amesco@earthlink.net<mailto:amesco@earthlink.net>>, "Tom Lennox" <toml@hiltonheadislandsc.gov<mailto:toml@hiltonheadislandsc.gov>>, <JohnM@hiltonheadislandsc.gov<mailto:JohnM@hiltonheadislandsc.gov>>, "Likins Kim" <KimL@hiltonheadislandsc.gov<mailto:KimL@hiltonheadislandsc.gov>>, Harkins Bill <WilliamH@hiltonheadislandsc.gov<mailto:WilliamH@hiltonheadislandsc.gov>>, <MarcG@hiltonheadislandsc.gov<mailto:MarcG@hiltonheadislandsc.gov>>
Cc: Brian Tolley <steveaustin@islandpacket.com<mailto:steveaustin@islandpacket.com>>
Subject: Please add to record my speech today I could not make !

MAYOR BENNETT AND MEMBERS OF THE TOWN COUNCIL:

I REGRET ONCE AGAIN THAT OTHER COMMITMENTS PREVENTED ME FROM BEING AT THE MEETING TODAY.

BUT IN LIGHT OF RECENT DEVELOPMENTS, IT IS IMPORTANT THAT I GET CERTAIN FACTS ON THE RECORD.

NUMBER ONE, IT IS WELL-ESTABLISHED AT THIS POINT THAT FOUR OF YOU -- MS. LIKINS AND MR. MCCANN, HARKINS AND LENNOX -- PASSED A TOTALLY CORRUPTED CHAMBER DMO CONTRACT THAT WAS NOT EVEN DRAFTED BY THE TOWN, BUT WAS WRITTEN BY THE CHAMBER CEO AND CROOK BILL MILES. AND I AM HERE TO TELL YOU, AGAIN, THAT YOU WILL NOT GET AWAY WITH THAT.

WHEN THE TIME COMES, I WILL SEE TO IT YOU ARE BOOTED FROM OFFICE, BECAUSE ALL FOUR OF YOU ARE LIARS AND YOU ARE UNFIT TO SERVE.

FOR EXAMPLE, YOU LIED ABOUT INSPECTING THE CHAMBER'S BOOKS. YOU DID NO SUCH THING. AND YOU SHOULD BE ASHAMED OF YOURSELVES FOR LYING TO THE PUBLIC. BUT THAT'S EXACTLY WHAT YOU DID. AND YOU WILL NOT GET AWAY WITH IT.

YOU'VE ALSO REFUSED TO DO A PROPER INDEPENDENT AUDIT OF THE CHAMBER, EVEN THOUGH BILL MILES CONTINUES TO REFUSE TO DISCLOSE HOW HE SPENDS THE ALMOST $2 MILLION A YEAR YOU GIVE HIM IN ACCOMMODATIONS TAXES.

AND I KNOW WHY YOU REFUSE TO DO THE AUDIT -- BECAUSE YOU'RE AFRAID OF WHAT YOU WILL FIND.

IF BILL MILES HAD NOTHING TO HIDE, HE WOULD OPEN HIS BOOKS. BUT HE ABSOLUTELY REFUSES TO DO THAT. AND BASED ON THAT, EVERYBODY IN THIS ROOM KNOWS HE HAS SOMETHING TO HIDE.

I AM ALSO OFFENDED BY THE FACT

YOU'VE APPROVED THE USE OF TAXPAYER

MONEY TO FILE A FRIVOLOUS LAWSUIT AGAINST ME ON BEHALF OF MS. LIKINS. AND I REPEAT, SHE IS A LIAR AND UNFIT FOR HER ROLE ON THE COUNCIL OR HER PRIVATE SECTOR JOB. AND SHE WILL NOT GET AWAY WITH HER LIES. I WILL BEAT HER IN COURT AND EXPOSE HER AS THE FRAUD SHE IS.

ALL OF THAT SAID, I AM ANNOUNCING TODAY THAT I AM PROCEEDING WITH MY PROCUREMENT CODE LAWSUIT AGAINST THE TOWN AND MY FIRST AMENDMENT LAWSUIT AGAINST YOU, MAYOR BENNETT.

YOU SHOULD BE ASHAMED OF YOURSELF, MAYOR BENNETT, FOR TRYING TO SILENCE ME, WHEN I AM THE ONE WHO HAS DISCOVERED AND MADE PUBLIC ALL OF THE IMPORTANT FACTS IN THE CHAMBER MATTER.

AND RATHER THAN ACT IN THE PUBLIC INTEREST AND SUPPORT MY EFFORTS, YOU HAVE CALLED ME A "BULLY" AND DONE EVERYTHING YOU CAN TO SILENCE ME.

BUT I CANNOT BE SILENCED.

AND I THINK IT'S UNFORTUNATE THAT YOU WILL NOW WASTE TAXPAYER MONEY DEFENDING TWO LAWSUITS THAT DID NOT HAVE TO BE BROUGHT.

ALL YOU WOULD HAVE NEEDED TODO TO PREVENT THEM IS SHOW SOME COURAGE AND CHARACTER AND FIGHT FOR WHAT'S RIGHT.

BUT THAT'S NOT WHAT YOU DID, MAYOR BENNETT.

YOU LET MS. LIKINS AND MR. MCCANN, HARKINS AND LENNOX -- PLUS THE INCOMPETENT STEVE RILEY AND BRIAN HULBERT -- PUT YOU IN THE POSITION YOU'RE IN.

AND YOU WILL ALL PAY FOR THAT.

I GUARANTEE IT.

THANK YOU.

Sent from my iPhone excuse all typos and misspellings

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

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed.

If you have received this email in error please notify the originator of the message.

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

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

LETTER FROM SKIP HOAGLAND

TV and Hollywood has had some bad actors.

The Hilton Head Island Town Council has four.

Council members Likins, McCann, Lennox and Harkins have betrayed the Town and taxpayers by selling out to Bill Miles and the Hilton Head Island-Bluffton Chamber.

The recent actions by four of the seven members of the Hilton Head Island Town Council in defending and protecting the Hilton Head Island-Bluffton Chamber of Commerce from proper scrutiny and accountability should be offensive to everyone in Beaufort County who supports transparency.

Over the past 18 months, Council members Kim Likins, John McCann, Tom Lennox and Bill Harkins have shown, over and over again, that they put the best interests of Bill Miles and the Hilton Head Island-Bluffton Chamber of Commerce above the best interests of the Town.

They continue to give almost $2 million per year in accommodations taxes to the Chamber to function as the Town's designated marketing organization (DMO) to promote local tourism, even though Bill Miles refuses to disclose, in detail, exactly how all that money is spent.

In short, THE FOUR that dominate our current Town Council in voting are anything but public servants who stand up for the public interest. They are cohorts of Bill Miles and the Chamber, who have repeatedly proven themselves unfit for office, in my opinion. And they must be removed from their positions come election time.

They approved a corrupted Chamber contract that is not worth the paper it is written on. In fact, it appears that the contract development process was controlled by Bill Miles and his attorney David Tigges. Town Manager Steve Riley then cooperated with the Chamber and Likins, McCann, Lennox and Harkins to get the contract approved, despite the public outcry against it last November. In fact we have a chamber board member on record and on video who said the chamber worked hard on this contract.

They misrepresented the facts when they said they inspected the Chamber's books. Three of THE FOUR said the Chamber's books had been inspected by one or more members of the council. But they have refused to reveal who inspected what records. They simply pronounced the Chamber above suspicion, without any formal justification for that finding. (See recorded video of Town meeting Nov. 17, 2015 on Town website.)

They approved the use of taxpayer money to pay lawyers to file a private lawsuit against me. After I challenged Kim Likins, whom I think is unfit to work her day job with boys and girls, on her actions and called her employer to inform them of her actions as a public official, she schemed with other council members and town lawyers to pass an outrageous resolution to file lawsuits against citizens that make public speeches they don't like. They then proceeded to file a frivolous defamation lawsuit against me in an effort to silence me. Then the Town Council voted to have taxpayers pay her legal bills. So far, the Town has paid over $40,000 in legal fees, while my defense has cost only $5,000. That shows just how incompetent and abusive Ms. Likins - and the rest of THE FOUR are. Taxpayers should be outraged by such waste, not to mention their intimidating attempt to silence citizens.

They refused to support an audit of the Chamber. In February, I won a landmark Freedom of Information Act (FOIA) lawsuit against Bill Miles and the Chamber. The judge declared them a "public body" since they are funded with public money, and said I have the right to inspect their books. But Bill Miles still refuses to allow me or anyone else to see all his books. And he does so with the full support of THE FOUR. The so-called "independent audits" the Chamber submits to the Town each year that are posted on the Chamber website are nothing more than a recapitulation of financial statements, in my opinion. They are not even remotely related to a genuine forensic audit of the type that invariably gets DMOs into trouble.

Now, the abusive incompetence of THE FOUR will force the Town to pay unnecessary legal fees to defend against my new lawsuit. In signing the first-ever contract with the Chamber to serve as its DMO and promote local tourism last November, the Town violated its procurement code by not putting the function out for competitive bid. THE FOUR, despite the commendable efforts of Mayor David Bennett to correct the mistake, stood by Bill Miles and the Chamber – again. Now I will sue the Town. And the Town will waste even more taxpayer money fighting me, because I will win.

As a citizen and voter, you should be ashamed of THE FOUR. And you should help me hold them accountable.

EXHIBIT 2

STATE OF SOUTH CAROLINA COUNTY OF BEAUFORT Kim Likins, Plaintiff, v. C. C. "Skip" Hoagland, Defendant.	IN THE COURT OF COMMON PLEAS FOURTEENTH JUDICIAL CIRCUIT CASE NO.: 2015-CP-07-2937 **AFFIDAVIT OF MICHAEL G. BRIGGS**

Personally appeared before me Michael G. Briggs, who being duly sworn, under oath and under penalty of perjury, states as follows:

1. My name is Michael G. Briggs. I am over the age of 18 and competent to make this Affidavit.
2. I am an attorney, retired from private practice. As a volunteer, I serve as the President of the Board of Directors of the Boys & Girls Club of Hilton Head.
3. As explained in my prior affidavit in this case, on December 2, 2015, I received a telephone call from an individual who identified himself as "Skip Hoagland". Mr. Hoagland indicated that he was calling me to demand that Kim Likins, the Executive Director of the Boys & Girls Club of Hilton Head, be fired from her position because she was a liar and was unfit to be around children.
4. Recently, several members of the Boys & Girls Club of Hilton Head received harassing e-mails from Defendant C. C. "Skip" Hoagland ("Hoagland"). I asked that those e-mails be forwarded to me so that I could collect them as the President of the Board.

5. On June 20, 2016, Sandy West forwarded four emails to me dated June 19, 2016 from Hoagland to her, true and accurate copies of which are attached hereto as Exhibit A, Exhibit B, Exhibit C, and Exhibit D (Exhibit D is an email to Pam Freedman and to her).
6. On June 20, 2016, Pam Freedman forwarded two emails to me dated June 19, 2016 from Hoagland to Sandy West and her, true and accurate copies of which are attached hereto as Exhibit D and Exhibit E.
7. On June 20, 2016, Abby Petkov forwarded an email to me dated June 19, 2016 from Hoagland to her, a true and accurate copy of which is attached hereto as Exhibit F.
8. On June 20, 2016, Stan Smith forwarded an email to me dated June 19, 2016 from Hoagland to him, a true and accurate copy of which is attached hereto as Exhibit G.

FURTHER AFFIANT SAYETH NOT.

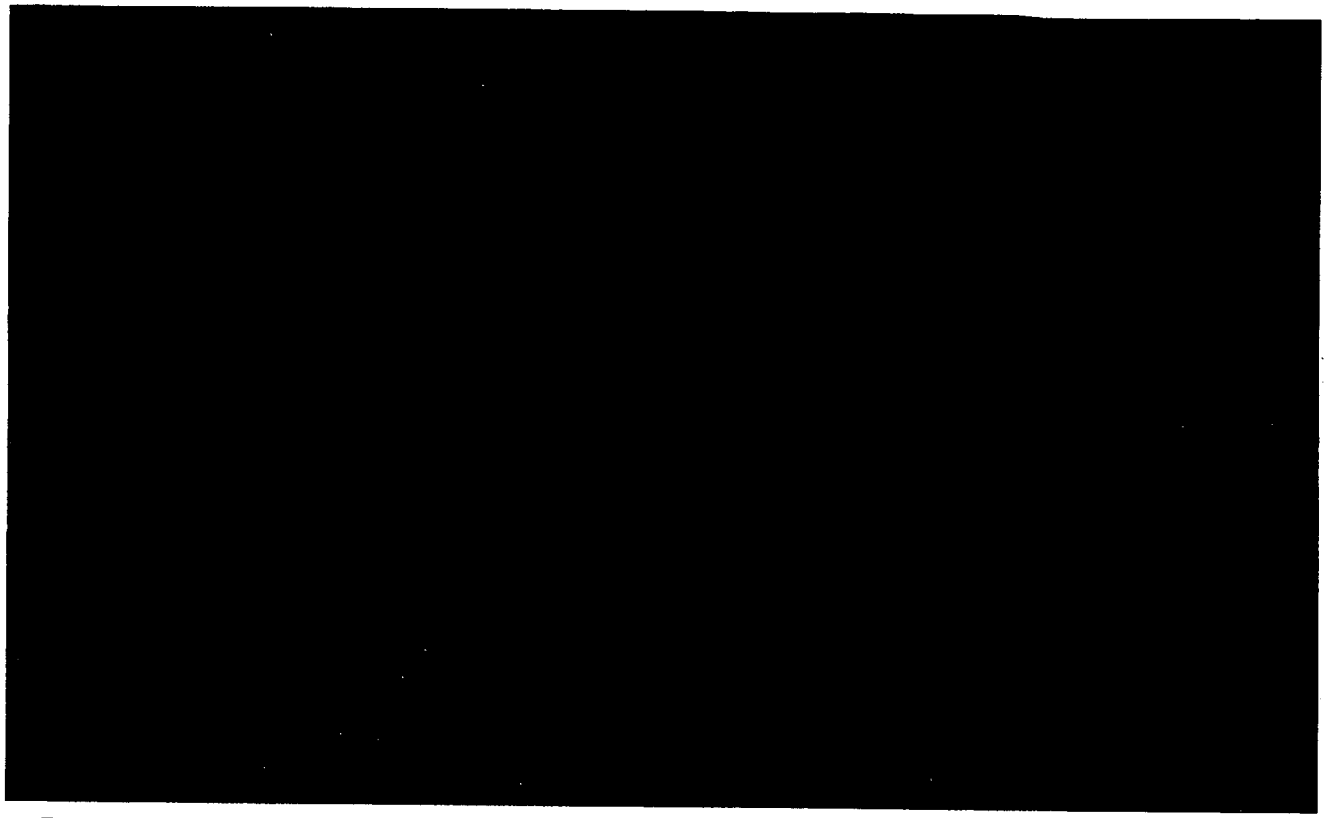
Michael G. Briggs

Sworn this 29th Day of June 2016

GREGORY M. ALFORD
Notary Public, State of South Carolina
My Commission Expires 3/17/2026

Notary Public for _____

My Commission Expires: _____



From: CC Hoagland [mailto:skiphoagland@yahoo.com]
Sent: Sunday, June 19, 2016 6:26 PM
To: sandy west
Subject: Fwd: Failure Notice

Sandy I sent all to wrong email sorry I will resend.

Sent from my iPhone excuse all typos and misspellings

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

Begin forwarded message:

> **From:** mailto:MAILER-DAEMON@yahoo.com
> **Date:** June 19, 2016 at 4:48:53 PM EDT
> **To:** skiphoagland@yahoo.com
> **Subject: Failure Notice**
>
> Sorry, we were unable to deliver your message to the following address.
>
> <sandy@sweet-lighthouse.com>:
> No MX or A records for sweet-lighthouse.com

--- Below this line is a copy of the message.

Received: from [98.137.12.191] by nm16.bullet.mail.gq1.yahoo.com with NNFMP; 19 Jun 2016 20:48:53 -0000
Received: from [98.136.164.78] by tm12.bullet.mail.gq1.yahoo.com with NNFMP; 19 Jun 2016 20:48:53 -0000
Received: from [127.0.0.1] by smtp240.mail.gq1.yahoo.com with NNFMP; 19 Jun 2016 20:48:53 -0000
X-Yahoo-Newman-Id: 678428.54369.bm@smtp240.mail.gq1.yahoo.com
X-Yahoo-Newman-Property: ymail-3
X-YMail-OSG: 0RE3AXQVM1kjnlsGjO.5NiukhuloXodnBw7o34Ro_xiffU9
iSVwxXEHs1BN5fpRK4t9clU6uM.uQoRPmPRMClOPTa1aPGij5kyh8QRS8n_f
krc9Ts5FkzSQahWNi4U49oKQQlujBk8mK9m4H3nY6QaF3zZSocXnI.r1P09W
qvdWN5j_Q1u1HUj7GDSlNcZApTaD7MLBfYmjg.CZCGHSDZr8P6yEyjShfZsI
RMCgPG5npGhm_DaWbXJVm4FpBvd9g1KbZaI8Grt.2H4sxDdm3VghI27UhSUp
zKsYZwwoxg_K388RD0xQPI35hW9EMHoEt4Be00fcRgjx8GBJwN.5JorxXFj_
hjpSVtc3oQf43XhsdlWpy3GVpHkaHeDsqEqfvo_SiS92X2IG6_Jrwm4qjQ2I
MzOpCY7sJXfvw2nm.CKxbT6yWDx2Tw44YBRkONShvepOsvdfs1RsVCmBMdW5
ECkkGc93zYw4xqPggIgHMofqkwAhwUrQnLPUhQ2GEJPQi9bHVJqVH20gVH9e
hBWl8Wwm0KZxlgJK8O..t9OfJefBcJODvcg_V69uNob_d.DEoY40cEpV83eU
-
X-Yahoo-SMTP: SN5CYWCswBBcSwaRmo_bwXm7W1OGCj9YYg--
Content-Type: multipart/alternative;
  boundary=Apple-Mail-25BB8762-E436-4F9E-BC5E-8CACACD643D7
Mime-Version: 1.0 (1.0)
Subject: Re: Kim Likins has now involved you in our lawsuit
From: CC Hoagland <skiphoagland@yahoo.com>
X-Mailer: iPhone Mail (13F69)
In-Reply-To: <E6B22E21-B799-49EA-92DF-09DB8C00ADE2@yahoo.com>
Date: Sun, 19 Jun 2016 16:48:51 -0400
Cc: Jim Brown Jim Brown Lawyer <jimbrownlaw@hargray.com>
Content-Transfer-Encoding: 7bit
Message-Id: <2AA6C94F-9402-46D6-89B3-D31782D8B752@yahoo.com>
References: <E6B22E21-B799-49EA-92DF-09DB8C00ADE2@yahoo.com>
To: sandy@sweet-lighthouse.com

--Apple-Mail-25BB8762-E436-4F9E-BC5E-8CACACD643D7
Content-Type: text/plain;
  charset=us-ascii
Content-Transfer-Encoding: quoted-printable

Who is andrew ? Thanks=20

Sent from my iPhone excuse all typos and misspellings=20

Skip Hoagland / CEO
Domains New Media LLC=20
US cell 843-384-7260
Off. Buenos Aires , Argentina=20
011-54-9-11-5942-3202

On Jun 19, 2016, at 4:46 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

=20

Lisa are you sure Kim and Sandy are your Godly faithful friends ? Read San=

dy's comments to Kim Likins about you ?

Lisa I have to agree you are not that smart and you like Kim Likins who li=
ed on video who is also not that smart, will not escape from all your abuse t=
o others. You used town employees to sell bill miles Hhi chamber memberships=
that harmed the Greater Bluffton chamber and you have used your position of=
mayor to profit you in realestate. We have all the records of these million=
s in sales and listings. As you already know we have all we need to end this=
abuse and corruption.=20

=20

<IMG_3228.JPG>

=20

=20

Sent from my iPhone excuse all typos and misspellings=20

=20

Skip Hoagland / CEO

Domains New Media LLC=20

US cell 843-384-7260

Off. Buenos Aires , Argentina=20

011-54-9-11-5942-3202

=20

=20

--Apple-Mail-25BB8762-E436-4F9E-BC5E-8CACACD643D7
Content-Type: text/html;
charset=utf-8
Content-Transfer-Encoding: quoted-printable

<html><head><meta http-equiv=3D"content-type" content=3D"text/html; charset=3D=
utf-8"></head><body dir=3D"auto"> Who is andrew ? Thanks

Se=
nt from my iPhone excuse all typos and misspellings
 <div=

<span style=3D"background-color: rgba(255, 255, 255, 0);">Skip Hoaglan=
d / CEO <span style=3D"background-color: rgba(255, 255, 255=
, 0);">Domains New Media LLC <span style=3D"backgroun=
d-color: rgba(255, 255, 255, 0);">US cell <a href=3D"tel:843-384-7260" x=
-apple-data-detectors=3D"true" x-apple-data-detectors-type=3D"telephone" x-a=

pple-data-detectors-result=3D"0/1">843-384-7260 <span s=
tyle=3D"background-color: rgba(255, 255, 255, 0);">Off. Buenos Aires , Argen=
tina <a href=3D"tel:011-54-9-11-5942-3202" x-apple-da=
ta-detectors=3D"true" x-apple-data-detectors-type=3D"telephone" x-apple-data=
-detectors-result=3D"2" style=3D"background-color: rgba(255, 255, 255, 0); f=
ont-size: 13pt;">011-54-9-11-5942-3202 <div style=3D"font-family: U=
ICTFontTextStyleBody; font-size: 19px; -webkit-text-size-adjust: auto;">
=

On Jun 19, 2016, at 4:46 PM, CC Ho=
agland <skiphoagland@yahoo.com<=
/a>> wrote:

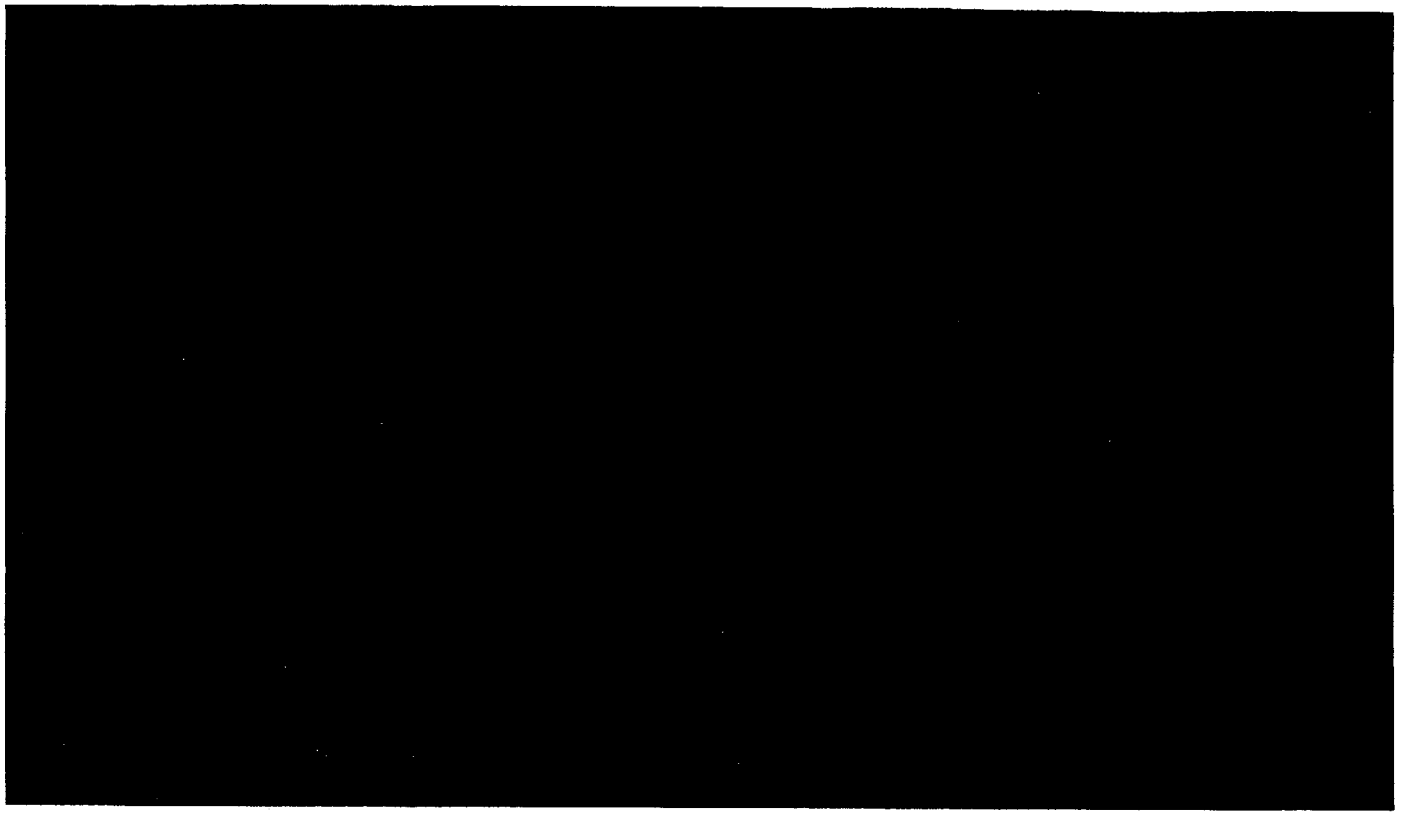
 <blockquote type=3D"cite"> <meta http-equiv=3D=
"content-type" content=3D"text/html; charset=3Dus-ascii"> Lisa are you s=
ure Kim and Sandy are your Godly faithful friends ? Read Sandy's comments to=
Kim Likins about you ? Lisa I have to agree you are not that smar=
t and you like Kim Likins who lied on video who is also not that smart, will=
not escape from all your abuse to others. You used town employees to sell b=
ill miles Hhi chamber memberships that harmed the Greater Bluffton chamber a=
nd you have used your position of mayor to profit you in realestate. We have=
all the records of these millions in sales and listings. As you already kno=
w we have all we need to end this abuse and corruption.

<IMG=
_3228.JPG>

Sent from my iPhone excuse all typos and mis=
spellings
 <span style=3D"background-color: rgb=
a(255, 255, 255, 0);">Skip Hoagland / CEO <span style=3D"ba=
ckground-color: rgba(255, 255, 255, 0);">Domains New Media LLC <=
/div> <span style=3D"background-color: rgba(255, 255, 255, 0);">US cell&=
nbsp;<a href=3D"tel:843-384-7260" x-apple-data-detectors=3D"true" x-apple-da=
ta-detectors-type=3D"telephone" x-apple-data-detectors-result=3D"0/1">843-38=
4-7260 <span style=3D"background-color: rgba(255, 255, 2=
55, 0);">Off. Buenos Aires , Argentina <a href=3D"tel=
:011-54-9-11-5942-3202" x-apple-data-detectors=3D"true" x-apple-data-detecto=
rs-type=3D"telephone" x-apple-data-detectors-result=3D"2" style=3D"backgroun=
d-color: rgba(255, 255, 255, 0); font-size: 13pt;">011-54-9-11-5942-3202=
<div style=3D"font-family: UICTFontTextStyleBody; font-size: 19px; -we=
bkit-text-size-adjust: auto;">

 </b=
lockquote></body></html>=

--Apple-Mail-25BB8762-E436-4F9E-BC5E-8CACACD643D7--



From: CC Hoagland [mailto:skiphoagland@yahoo.com]
Sent: Sunday, June 19, 2016 6:32 PM
To: sandy west
Subject: Fwd: Kim Likins has now involved you in our lawsuit

FYI

Sent from my iPhone excuse all typos and misspellings

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

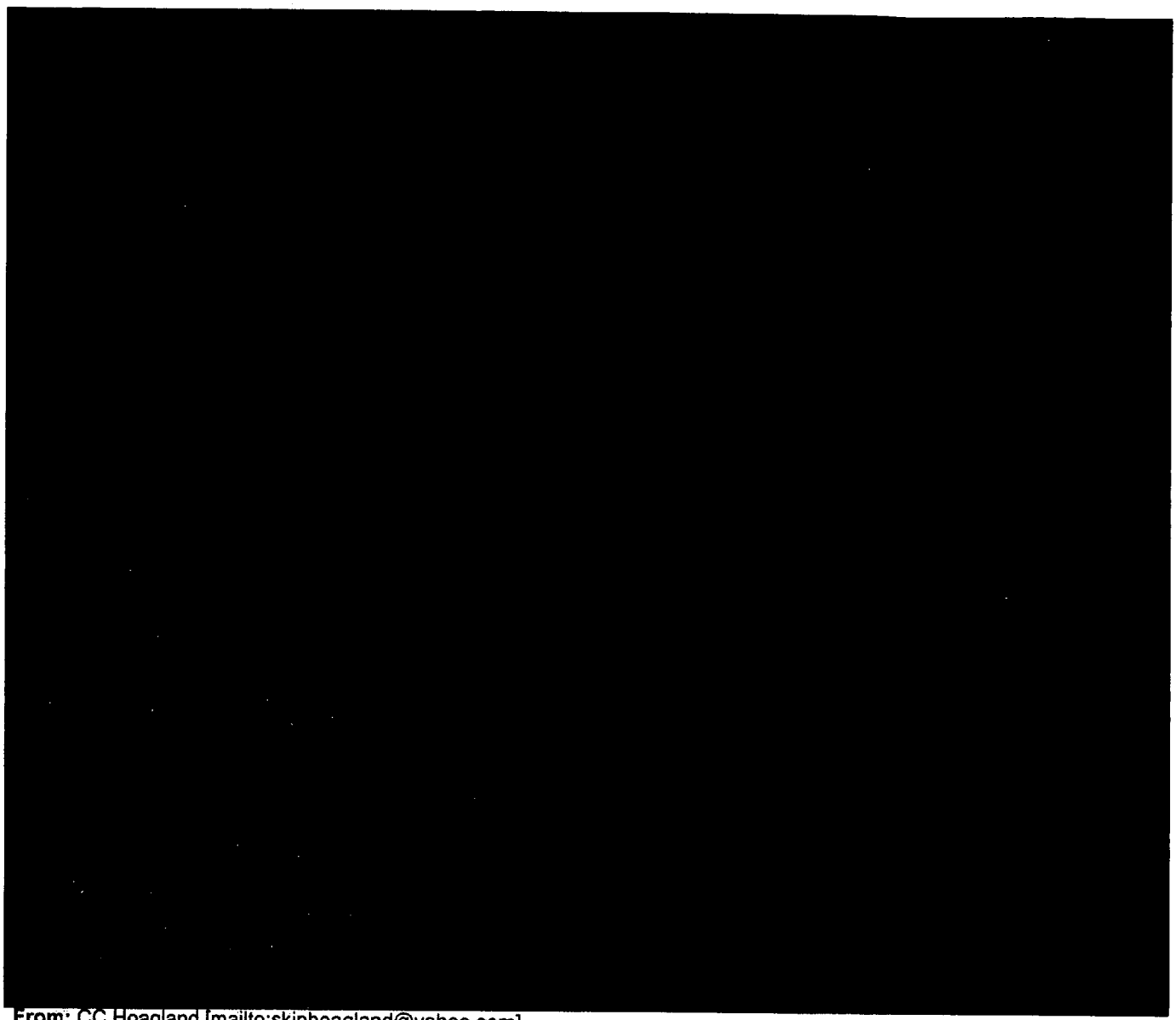
Begin forwarded message:

> **From:** CC Hoagland <skiphoagland@yahoo.com>
> **Date:** June 19, 2016 at 4:48:51 PM EDT
> **To:** sandy@sweet-lighthouse.com
> **Cc:** Jim Brown Jim Brown Lawyer <jimbrownlaw@hargray.com>
> **Subject: Re: Kim Likins has now involved you in our lawsuit**
>
> Who is andrew ? Thanks
>
> Sent from my iPhone excuse all typos and misspellings

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

On Jun 19, 2016, at 4:46 PM, CC Hoagland <skiphoagland@yahoo.com> wrote:

> Lisa are you sure Kim and Sandy are your Godly faithful friends ? Read Sandy's comments to Kim Likins about you ?
> Lisa I have to agree you are not that smart and you like Kim Likins who lied on video who is also not that smart, will not escape from all your abuse to others. You used town employees to sell bill miles Hhi chamber memberships that harmed the Greater Bluffton chamber and you have used your position of mayor to profit you in realestate. We have all the records of these millions in sales and listings. As you already know we have all we need to end this abuse and corruption.
>
> <IMG_3228.JPG>
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland / CEO
> Domains New Media LLC
> US cell 843-384-7260
> Off. Buenos Aires , Argentina
> 011-54-9-11-5942-3202



From: CC Hoagland [mailto:skiphoagland@yahoo.com]
Sent: Sunday, June 19, 2016 6:33 PM
To: sandy west
Subject: Fwd: Kim Likins has involved you in her lawsuit

FYI

Sent from my iPhone excuse all typos and misspellings

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

Begin forwarded message:

From: CC Hoagland <skiphoagland@yahoo.com>
Date: June 19, 2016 at 4:26:30 PM EDT
To: sandy@sweet-lighthouse.com
Cc: Jim Brown Jim Brown Lawyer <jimbrownlaw@hargray.com>
Subject: Kim Likins has involved you in her lawsuit

Sandy what do you mean you stand with her on the Skip stuff ? What stuff? What will prevail lies or truth ? I can assure you God knows the correct answer and perhaps God will share this with you , if you don't want to listen to me and earthly facts from a simple common man.

From: sandy west, <sandy@west-lighthouse.com>
Sent: Thursday, December 10, 2015 6:35 PM
To: Kim Likins
Subject: Re: Planning and Budgeting

Kim,
Thanks for sharing the email from Lisa.....I totally agree with her comments. Are you ok with me emailing her back with encouragement and letting her know you shared this email with me? As you know, I am not in the loop on any of this and I DO think she is smart, instrumental, etc.
I am glad we connected today.....thanks for filling me in.
FYI – Andrew and I will meet Monday at 10 AM so I'd love to connect with you after that. Thanks for the support you probably threw my way to make this connection happen.
What about a quick meeting on Wednesday at noon at ABC? I have Jill at 1:30 at the Club, then Dan Moscar at 2:30 and the board meeting at 4 PM. Let me know if that works for you.....
Thanks! You are THE BEST....so happy God put you on the path of my life.
xoxo
PS: Know that I stand with you with re: the Skip stuff...and right will prevail over wrong.....I just know it to be true! I think your prayers have been answered....do you agree?

Sandy West
Principal, Lighthouse Consulting, LLC
Partner, AccelerateYourLeaders
Sent from my iPad

On Dec 10, 2015, at 4:32 PM, Kim Likins <Kim.Likins@bgclowcountry.org> wrote:

Sandy,
See the comments below. This is what is missing and desperately needs to be worked on to make this successful. Everyone with the exception of John Martin seems to sense this. He thinks it can be done over time but we don't see how we can craft the message if we don't know what we are asking for and why.

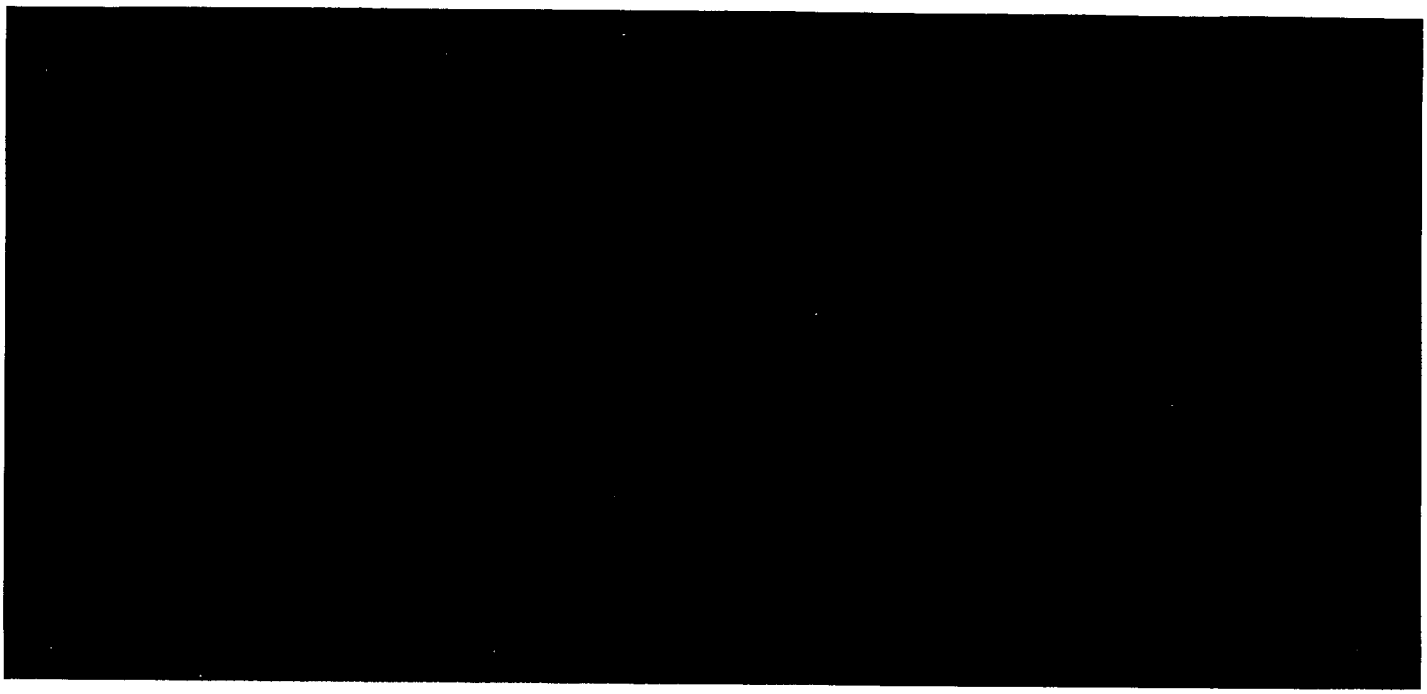
Hope you have a super weekend!!
xoxoxo
Kim

Kim Likins
Director
Boys & Girls Club of Hilton Head Island
843.715.1725
Kim.Likins@bgclowcountry.org

Our mission is to enable all young people, especially those who need us most, to reach their full potential as productive, caring, responsible citizens. We are proud to have served the youth of Hilton Head Island for 40 years!

Sent from my iPhone excuse all typos and misspellings

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



From: CC Hoagland <skiphoagland@yahoo.com>
Date: June 19, 2016 at 7:01:35 PM EDT
To: pgfreedman@aol.com, sandy@swest-lighthouse.com
Cc: Jim Brown Jim Brown Lawyer <jimbrownlaw@hargray.com>
Subject: Kim Likins lawsuit

Pam in this email you call me an idiot and not respected ? Can you explain both these and what I did wrong ? I repeat kim Likins lied I did not ? Does this mean I am an idiot and not respected to force truth and transparency ?

MM

...d a lot for the Club. Well, anyway, my hangup but i do want to see ... girls and this is perfect opportunity to see a lot in one fell swoop.

...OMG. This article today. Hoagland is an idiot and so not ... DON'T THINK MIKE BRIGGS SAID IT STRONG ENOUGH in ... her contributions and her not being fit for being with children.

...KING ABOUT CRISIS MGMT here and want to be involved in ... very very much hope it is not first on agenda so I can ... we should be very aggressive in promoting Kim and I don't ... we acknowledge Hoagland at all. This comes before our gala. ...aign and I PERSONALLY AM DISGUSTED WITH ...HAT HE WOULD DRAG HER REPUTATION AND HER ... THRU THE MUD.

...o be aggressive and halt this slander campaign. I want to be a ... I did not think Mike was strong enough, Sandy. In person ... Thurs is my best day early afternoon, late lunch.

... Good luck in controlling Exec committee.

...ove you Sandy. xxl

...2015, at 5:34 PM, sandy west <sandy@swest-...com> wrote:

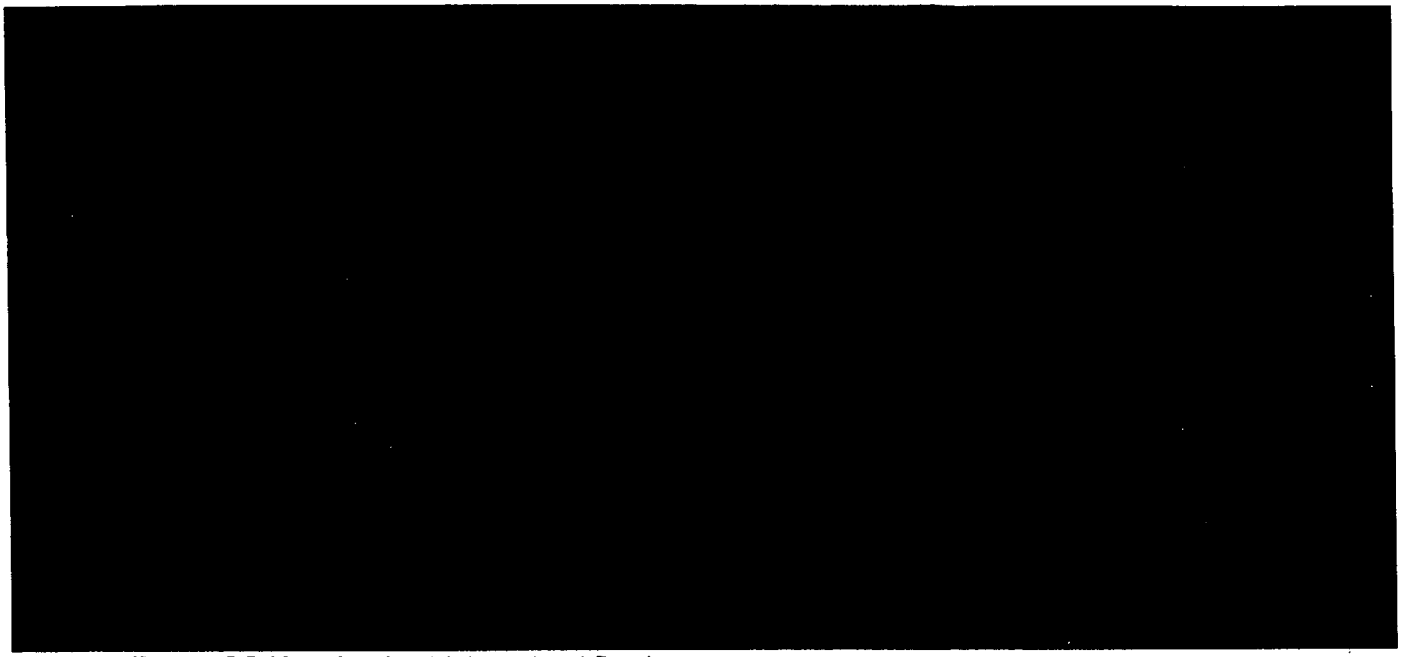
...et my response?

...Wed....will you be at the board meeting?

...West

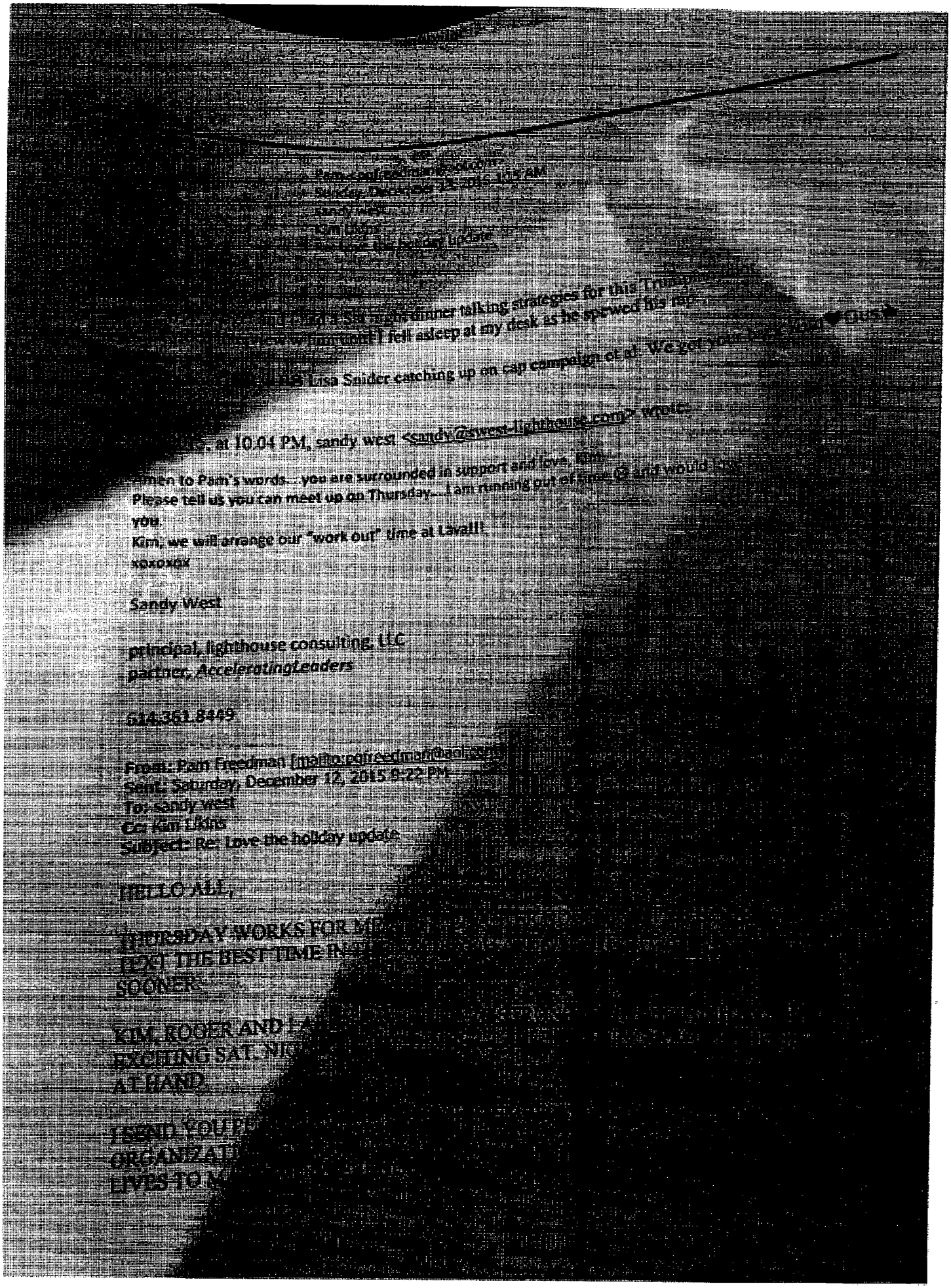
Sent from my iPhone excuse all typos and misspellings

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



From: CC Hoagland <skiphoagland@yahoo.com>
Date: June 19, 2016 at 6:44:58 PM EDT
To: pgfreedman@aol.com, sandy@swest-lighthouse.com
Cc: Jim Brown Jim Brown Lawyer <jimbrownlaw@hargray.com>
Subject: Kim has involved you in our lawsuit

Pam can you explain Trumpian idiot ? Spewed his rap? What video of me ? Do you understand I represent facts , transparency and accountibility and Kim lied on video tape. You watched my video on truth and facts now why don't you watch hers on lying ! Certainly as a woman of faith you want to seek the truth ? Correct ?



...dinner talking strategies for this Thurs...
...I fell asleep at my desk as he spewed his ne...
...Lisa Snider catching up on cap campaign et al. We got y...

...at 10:04 PM, sandy west <sandy@swest-lighthouse.com> wrote:

Amen to Pam's words... you are surrounded in support and love, Kim...
Please tell us you can meet up on Thursday---I am running out of time @ and would love...
you.
Kim, we will arrange our "work out" time at Laval!!
xoxoxox

Sandy West

principal, lighthouse consulting, LLC
partner, *AcceleratingLeaders*

614.361.8449

From: Pam Freedman [mailto:pgfreedman@earthlink...
Sent: Saturday, December 12, 2015 9:22 PM
To: Sandy West
Cc: Kim Likins
Subject: Re: Love the holiday update

HELLO ALL,

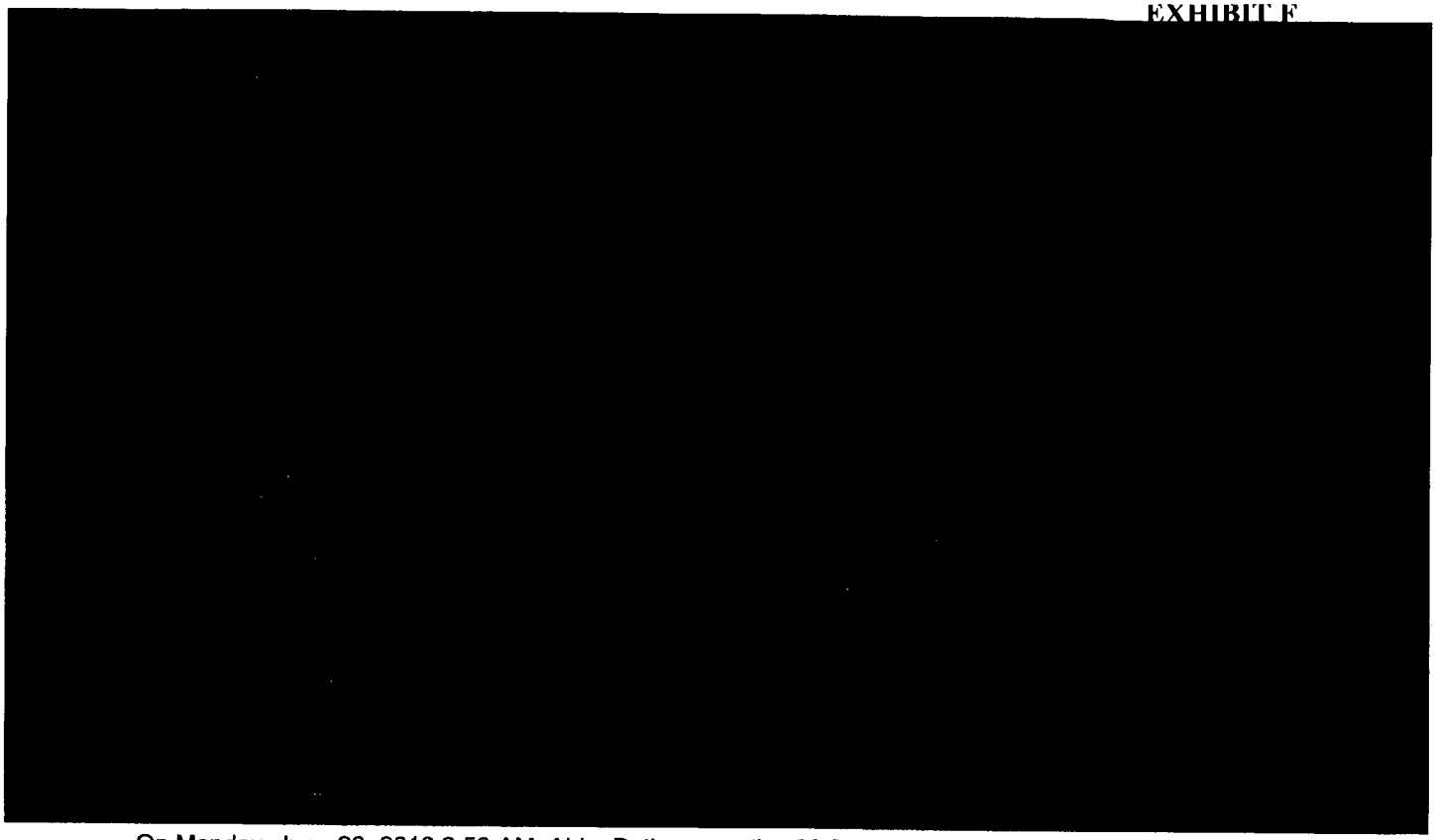
THURSDAY WORKS FOR ME...
TEXT THE BEST TIME R...
SOONER...

KIM, ROGER AND I A...
EXCITING SAT. NI...
AT HAND...

I SEND YOU H...
ORGANZATI...
LIVES TO M...

Sent from my iPhone excuse all typos and misspellings

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



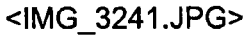
On Monday, June 20, 2016 6:50 AM, Abby Petkov <apetkov02@gmail.com> wrote:

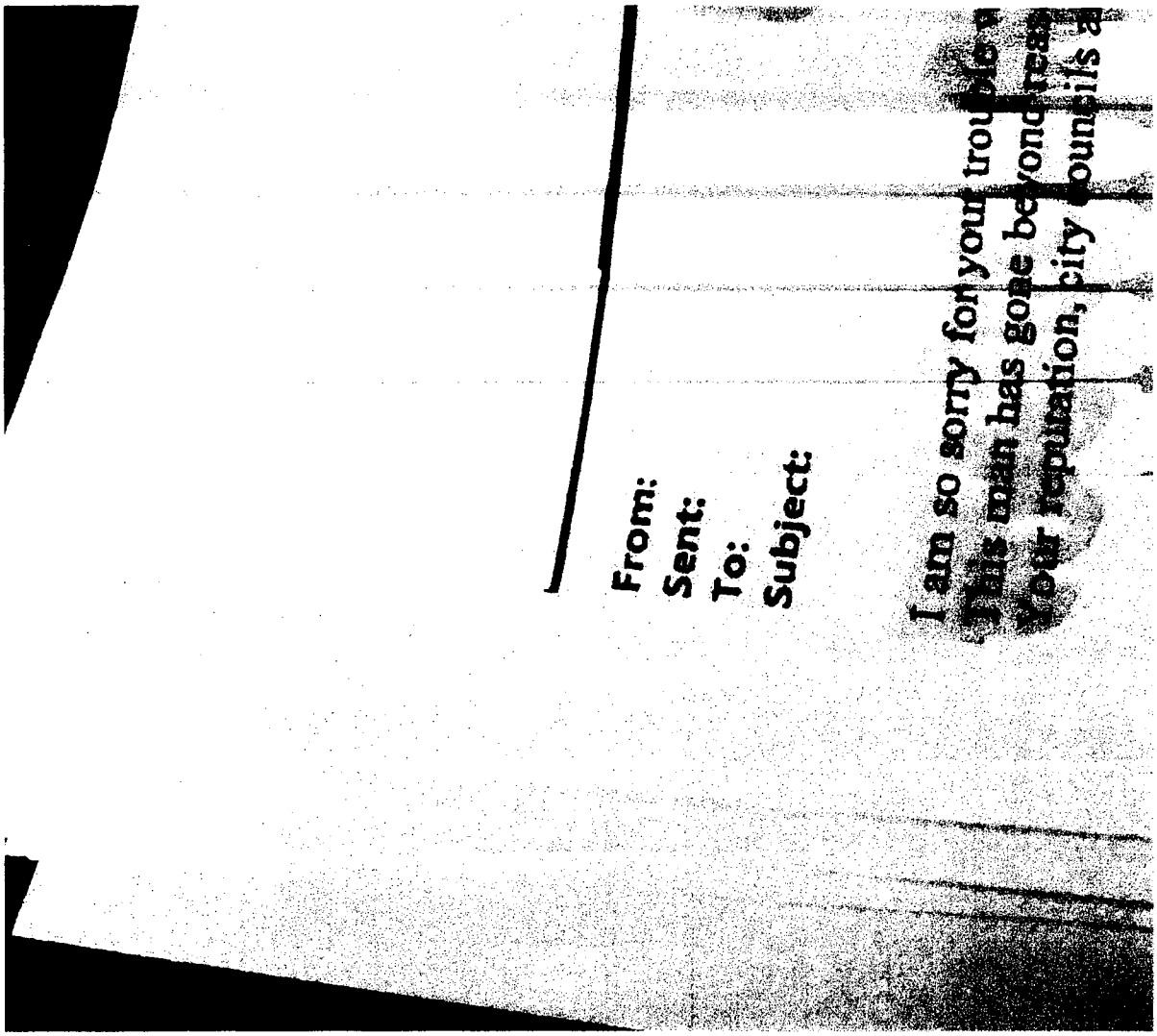
What does all this mean?

Sent from my iPhone

Begin forwarded message:

> **From:** CC Hoagland <skiphoagland@yahoo.com>
> **Date:** June 19, 2016 at 7:38:03 PM EDT
> **To:** apetkov02@gmail.com
> **Cc:** Jim Brown Jim Brown Lawyer <jimbrownlaw@hargray.com>
> **Subject: Kim Likins has now involved you in our lawsuit**
>
> Abby can you explain what you mean by all this ? Are you a aware I represent facts and truth and kim Likins lied on video camera ?
>
> <IMG_3241.JPG>
>
> Sent from my iPhone excuse all typos and misspellings
>
> Skip Hoagland / CEO
> Domains New Media LLC
> US cell 843-384-7260
> Off. Buenos Aires , Argentina
> 011-54-9-11-5942-3202


<IMG_3241.JPG>



Sent from my iPhone excuse all typos and misspellings

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

Attachments

- IMG_3241.JPG (1.73MB)

[redacted]

808

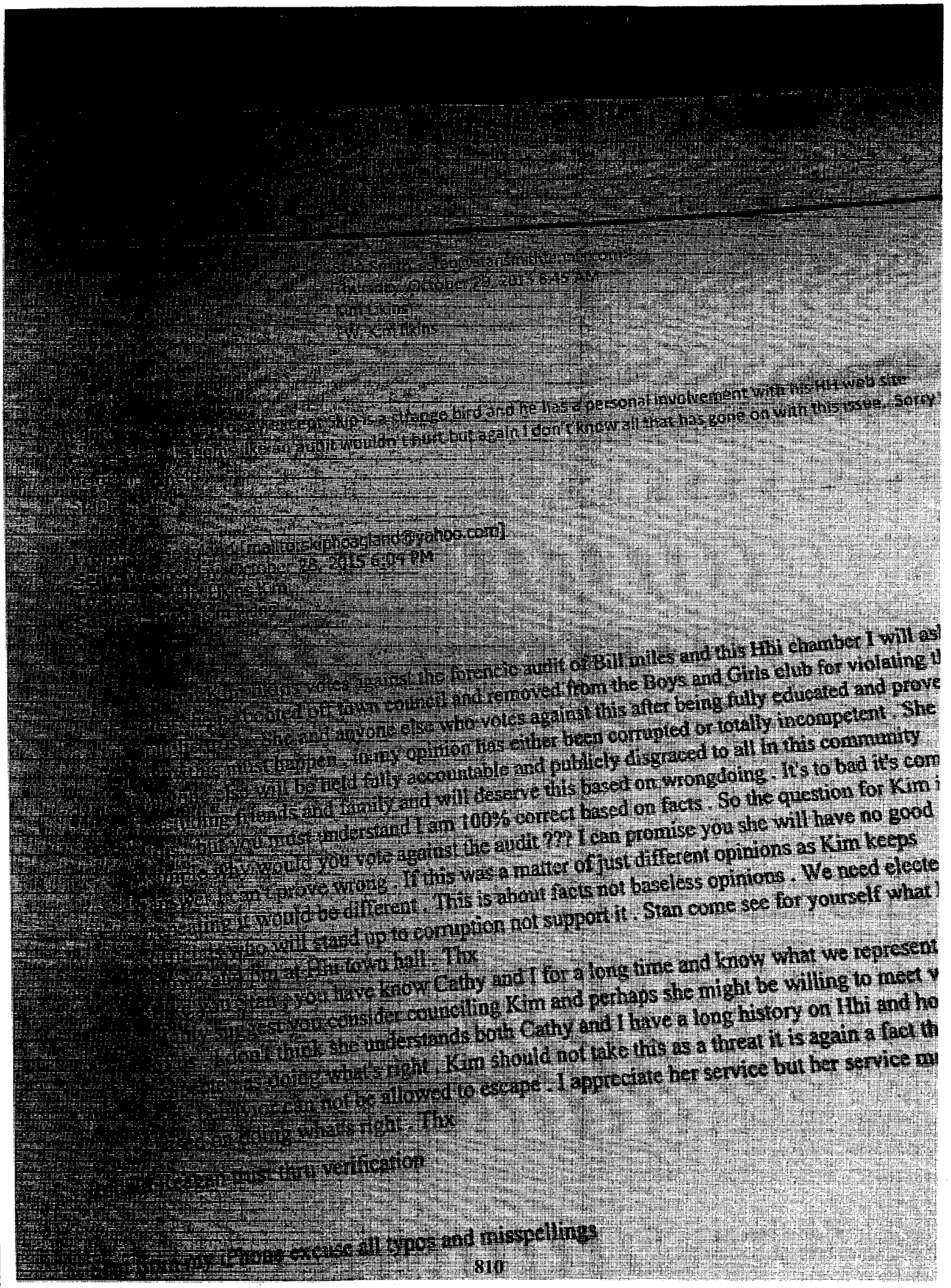
Abby Petkov <apetkov02@gmail.com>
Tuesday, December 15, 2015 6:38 AM
Kim Likins
Re: Dennis & Carol Draeger

ıith Skip. It is a crime in my opinion that should be pursued somehow.
on and the restraining order should be followed up with a cease and desist order.
nd the BGC are beyond reproach and should be protected in any way possible!

[redacted]

From: CC Hoagland [mailto:skiphoagland@yahoo.com]
Sent: Sunday, June 19, 2016 12:50 PM
To: Stan Smith
Cc: Jim Brown Jim Brown Lawyer
Subject: Kim Likins has sent your email to my lawyer

Stan seems you are now involved. Kim Likins has involved you.
Stan what do you mean by strange bird ? What do you mean by my website ? I think a more important response would have been Skip is demanding transparency in government and our chamber who receives public funds and skip and I know each other, do not socialize or have same interest and were neighbors. To my knowledge Skip has a good reputation on Hilton head. I think to label someone a strange bird is strange itself to appease Kim Likins who lied on video and voted to corrupt the chamber contract vote. Stan perhaps you think a liar is a better person than a strange bird what ever that means ?



Thursday, October 29, 2015 6:45 AM

RW: Cathkins

I have known Cathy and Kim for a long time and know what we represent is a strange bird and he has a personal involvement with his HH web site

[mailto:ekphoagland@yahoo.com]

October 28, 2015 6:07 PM

Hi Dyres Kim,

voted against the forencic audit of Bill miles and this Hbi chamber I will ask

voted off town council and removed from the Boys and Girls club for violating th

me and anyone else who votes against this after being fully educated and prove

must happen . In my opinion has either been corrupted or totally incompetent . She

will be held fully accountable and publicly disgraced to all in this community

friends and family and will deserve this based on wrongdoing . It's to bad it's com

understand I am 100% correct based on facts . So the question for Kim i

would you vote against the audit ??? I can promise you she will have no good

prove wrong . If this was a matter of just different opinions as Kim keeps

it would be different . This is about facts not baseless opinions . We need elected

will stand up to corruption not support it . Stan come see for yourself what

town hall . Thx

you have know Cathy and I for a long time and know what we represent

consider counciling Kim and perhaps she might be willing to meet w

think she understands both Cathy and I have a long history on Hbi and ho

what's right . Kim should not take this as a threat it is again a fact th

can not be allowed to escape . I appreciate her service but her service mu

doing what's right . Thx

verification

Please excuse all typos and misspellings

Sent from my iPhone excuse all typos and misspellings

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

STATE OF SOUTH CAROLINA)
)
COUNTY OF BEAUFORT)
)
Kim Likins.)
Plaintiff,)
vs.)
)
C.C. "Skip" Hoagland)
Defendant.)

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT

CASE NO.: 2015-CP-07-2937

MOTION AND ORDER INFORMATION FORM AND COVERSHEET

Plaintiff's Attorney:	Defendant's Attorney:
Gregory M. Alford, Bar No. 6932 Address: P.O. Drawer 8008 Hilton Head Island, SC 29938 Phone: 8438425500Fax 8438428400 E-mail: gregg@alfordlawsc.comOther: ____	____, Bar No. ____ Address: ____ Phone: ____ Fax____ E-mail: ____Other: ____

☒ **MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)**
☐ **FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)**
☐ **PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)**

SECTION I: Hearing Information

Nature of Motion: Motion for Rule to Show Cause, to Hold Defendant in Contempt of Court, for Protective Order, and to Shorten Time

Estimated Time Needed: 30 Court Reporter Needed: ☒ YES/☐ NO

SECTION II: Motion/Order Type

☒ Written motion attached
☐ Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.

Signature of Attorney for ☒ Plaintiff /☐ Defendant Date submitted: June 29, 2016

2016 JUN 29 PM 3:02
BEAUFORT COUNTY, S.C.
CLERK OF COURT

SECTION III: Motion Fee

☒ PAID – AMOUNT: $ 25.00

☐ EXEMPT: (check reason)
- ☐ Rule to Show Cause in Child or Spousal Support
- ☐ Domestic Abuse or Abuse and Neglect
- ☐ Indigent Status ☐ State Agency v. Indigent Party
- ☐ Sexually Violent Predator Act ☐ Post-Conviction Relief
- ☐ Motion for Stay in Bankruptcy
- ☐ Motion for Publication ☐ Motion for Execution (Rule 69, SCRCP)
- ☐ Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions
  Name of Court Reporter: ____
- ☐ Other: ____

JUDGE'S SECTION

☐ Motion Fee to be paid upon filing of the attached order.
☐ Other: ____

JUDGE CODE ____

Date: ____

CLERK'S VERIFICATION

Collected by:____ Date Filed: ____
☐ MOTION FEE COLLECTED: $ ____
☐ CONTESTED – AMOUNT DUE: $ ____

ALFORD & THORESON, LLC

Attorneys at Law
18 Executive Park Road, Building 1
P.O. Drawer 8008
Hilton Head Island, SC 29938-8008
Telephone (843) 842-5500
Facsimile (843) 842-8400
www.alfordlawsc.com

KAYLA MEAUX
EMAIL: KAYLA@ALFORDLAWSC.COM
(NOT FOR CONFIDENTIAL COMMUNICATIONS)

GREGORY M. ALFORD*
MITCHELL J. THORESON
THOMAS E. WILLIAMS†
*Also member Georgia Bar
† Of Counsel

June 29, 2016

2016 JUN 29 PM 3:02
JERRI ANN ROSENEAU
BEAUFORT COUNTY, S.C.
CLERK OF COURT

Via Hand Delivery
Honorable Jerri Ann Roseneau
Clerk of Court for Beaufort County
Post Office Drawer 1128
Beaufort, South Carolina 29901

Re: Kim Likins vs. C.C. "Skip" Hoagland
Civil Action No.: 2015-CP-07-02937

Dear Ms. Roseneau:

In connection with the above-referenced matter, please find an original and two (2) copies of the following documents:

1. Motion and Order Information Form and Coversheet

2. Notice of Motion and Motion for Rule to Show Cause, to Hold Defendant in Contempt of Court, for Protective Order, and to Shorten Time

In addition, please find enclosed a check in the amount of Twenty Five Dollars ($25.00) for the filing fee. Please file these documents with the court as appropriate, and clock and return the copies to Michael Barnes. Should you have any questions, comments, or concerns, please do not hesitate to call. Your assistance with this matter is greatly appreciated.

Very truly yours,
ALFORD & THORESON, LLC

Kayla Meaux

Kayla Meaux
Paralegal

Enclosures

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT	)	CASE NUMBER: 2015-CP-07-2957
	)	
KIM LIKINS	)	
Plaintiff,	)	MOTION FOR TEMPORARY INJUNCTION AND TO SHORTEN TIME PERIODS
v.	)	
	)	
C. C. "SKIP" HOAGLAND	)	
	)	
Defendant.	)	
	)	

2015 DEC 10 PM 4:25

JERRI ANN ROSENEAU
BEAUFORT COUNTY, S.C.
CLERK OF COURT

Kim Likins, hereby moves for a Temporary Restraining Order enjoining Defendant, C. C. Hoagland, his agents, and anyone in active concert or participation with him from:

(1) Contacting by telephone, e-mail or in person members of the Board of Directors of Boys Girls Club of Hilton Head Island or the Boys and Girls Club of the Lowcountry about any matter having to do with the employment of Kim Likins,

(2) Publishing or causing to be published any negative or defamatory statements regarding the Plaintiff and her employment;

(3) Taking any other actions that are intended to harass, embarrass or otherwise injure Plaintiff in her profession.

This Temporary Restraining Order to remain in effect for 10 days or until a hearing may be scheduled on Plaintiff's Motion for a Temporary Injunction.

Pursuant to Rule 65(b), SCRCP, a trial judge can issue a temporary restraining order without providing notice where "it clearly appears from specific facts shown by affidavit or by verified complaint that immediate or irreparable injury, loss or damage will

result to the applicant before notice can be served and a hearing had thereon." As explained in the Verified Complaint by Plaintiff, Defendant has been waging, and continues to wage, a persistent campaign of verbally abusing, defaming, and threatening Plaintiff; Defendant has publically stated and published to third parties that Plaintiff has conflicts of interests on Town Council and in her employment with the Boys and Girls Club, that she is a liar, that she is corrupt, that she violated the public's trust and that she is not fit for her job or position on Town Council; Defendant has communicated his intent to secure a full page ad in the local newspaper in an effort to "publically disgrace" and harm Plaintiff; Defendant has directly contacted the Chairman of the Board of the Boys and Girls Club of the Lowcountry, and the Chairman of the Board of the Boys and Girls Club of Hilton Head Island, and the Executive Director of the Boys + Girls Club of the Lowcountry (Plaintiff's direct supervisor) making false, defamatory, and outrageous remarks about Plaintiff and demanding that they take action to terminate Plaintiff from her desired profession and primary gainful employment. *See* Ex. A., Verified Compl., ¶¶ 6, 7, & 8. Defendant's actions are part of a continuing course of conduct and are apparently intended, among other things, to interfere with Plaintiff's job. *See* Ex. A., Verified Complaint, ¶ 19.

Therefore, for the forgoing reasons, the Court should grant Plaintiff's Motion for a Temporary Restraining Order to remain effective for 10 days or until a hearing on Plaintiff's Motion for a Temporary Injunction may be scheduled.

Plaintiff further moves that the applicable time periods for the hearing of a motion be shortened to allow for this hearing to take place based on the urgent reasons set forth above.

Respectfully submitted,

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

G. Trenholm Walker (S.C. Bar #5777)
John P. Linton (S.C. Bar # 79130)
PRATT-THOMAS WALKER, P.A.
Post Office Drawer 22247
Charleston, SC 29413-2247
843.727.2200
Email: gtw@p-tw.com
Email: jpl@p-tw.com

ATTORNEYS FOR PLAINTIFF

Charleston, South Carolina
December 10, 2015

STATE OF SOUTH CAROLINA)
) **AFFIDAVIT OF MARVIN LICH**
COUNTY OF BEAUFORT)

Personally appeared before me Marvin Lich, who, being duly sworn, under oath and under penalty of perjury, states as follows:

1. My name is Marvin Lich, I am over the age of 18 and competent to make this Affidavit.

2. As a volunteer, I serve as on the Board of the Boys and Girls Club of Hilton Head Island, and President of the Boys and Girls Club of the Low-country.

3. On or about December 3, 2015, I received a telephone call from an individual who identified himself as "Skip Hoagland". Mr. Hoagland indicated that he was calling me to demand that Kim Likins, the Executive Director of the Hilton Head Island Girls and Boys Club, be fired from her position because she was a liar and was unfit to be around children. Mrs. Likins, in addition to being the Executive Director of the Hilton Head Island Boys and Girls Club, is also a Member of the Town Council for the Town of Hilton Head Island.

4. Mr. Hoagland was apparently upset and angry with Mrs. Likins because she, in her capacity as a Town Council Member, had voted in favor of a contract with the Hilton Head Island/Bluffton Chamber of Commerce.

5. I informed Mr. Hoagland that I would look into the matter and get back to him as soon as I had an opportunity to evaluate his statements.

THE AFFIANT FURTHER SAYETH NAUGHT.

Marvin Lich
MARVIN LICH

Sworn to and subscribed before me on
this 10th day of December, 2015.

Jean E. McElroy
Notary Public for South Carolina
My Commission Expires: May 12, 2018

STATE OF SOUTH CAROLINA)
)
COUNTY OF BEAUFORT)

AFFIDAVIT OF MICHAEL G. BRIGGS

2015 DEC 10 PM 4:25

JERRI ANN ROSENEAU
BEAUFORT COUNTY S.C.
CLERK OF COURT

Personally appeared before me Michael G. Briggs, who, being duly sworn, under oath and under penalty of perjury, states as follows:

1. My name is Michael G. Briggs, I am over the age of 18 and competent to make this Affidavit.

2. I am an attorney, retired from private practice. As a volunteer, I serve as the President of the Board of Directors of the Boys and Girls Club of Hilton Head Island.

3. On December 2, 2015, I received a telephone call from an individual who identified himself as "Skip Hoagland". Mr. Hoagland indicated that he was calling me to demand that Kim Likins, the Executive Director of the Hilton Head Island Girls and Boys Club, be fired from her position because she was a liar and was unfit to be around children. Mrs. Likins, in addition to being the Executive Director of the Hilton Head Island Boys and Girls Club, is also a Member of the Town Council for the Town of Hilton Head Island.

4. Mr. Hoagland was apparently upset and angry with Mrs. Likins because she, in her capacity as a Town Council Member, had voted in favor of a contract with the Hilton Head Island/Bluffton Chamber of Commerce.

5. I am informed Mr. Hoagland that I would look into the matter and get back to him as soon as I had an opportunity to evaluate his statements.

THE AFFIANT FURTHER SAYETH NAUGHT.

MICHAEL G. BRIGGS

Sworn to and subscribed before me on
this 9 day of December, 2015.

Notary Public for South Carolina
My Commission Expires: ~~My Commission Expires~~
May 1, 2016

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT	)	
	)	CASE NO.: 2015-CP-07-2937
Kim Likins.	)	**MOTION AND ORDER INFORMATION FORM AND COVERSHEET**
Plaintiff,		
vs.	)	
C.C. "Skip" Hoagland	)	
Defendant.	)	

2015 DEC 10 PM 4:25
JEROLAINE ROSENEAU
BEAUFORT COUNTY, S.C.
CLERK OF COURT

Plaintiff's Attorney:	Defendant's Attorney:
Gregory M. Alford, Bar No. 6932 Address: P.O. Drawer 8008 Hilton Head Island, SC 29938 Phone: 8438425500Fax 8438428400 E-mail: gregg@alfordlawsc.comOther: _____	_____, Bar No. _____ Address: _____ Phone: _____ Fax_____ E-mail: _____Other: _____

☒ **MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)**
☐ **FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)**
☐ **PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)**

SECTION I: Hearing Information

Nature of Motion: Motion for Temporary Injunction and to Shorten Time Periods
Estimated Time Needed: 30 Court Reporter Needed: ☒ YES/☐ NO

SECTION II: Motion/Order Type

☒ Written motion attached
☐ Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.

_____ December 10, 2015
Signature of Attorney for ☒ Plaintiff /☐ Defendant Date submitted

SECTION III: Motion Fee

☒ PAID – AMOUNT: $_____
☐ EXEMPT: (check reason)
☐ Rule to Show Cause in Child or Spousal Support
☐ Domestic Abuse or Abuse and Neglect
☐ Indigent Status ☐ State Agency v. Indigent Party
☐ Sexually Violent Predator Act ☐ Post-Conviction Relief
☐ Motion for Stay in Bankruptcy
☐ Motion for Publication ☐ Motion for Execution (Rule 69, SCRCP)
☐ Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions
Name of Court Reporter: _____
☐ Other: _____

JUDGE'S SECTION	
☐ Motion Fee to be paid upon filing of the attached order. ☐ Other:	JUDGE CODE _____ Date: _____

CLERK'S VERIFICATION

Collected by:_____ Date Filed: _____
☐ MOTION FEE COLLECTED: $ _____
☐ CONTESTED – AMOUNT DUE: $ _____

SCCA 233 (11/2003)

State of South Carolina)	Court of Common Pleas
)	14th Judicial Circuit
County of Beaufort)	No.: 2015-CP-07-2937

Kim Lykins,

Plaintiff,

vs.

C.C. Hoagland,

Defendants.

HEARING

December 11, 2015

Hearing reported by Deborah S. Thomas, Certified Verbatim Reporter and Notary Public in and for the State of South Carolina; said hearing held before the Honorable Marvin H. Dukes, III, Beaufort County Master in Equity and Special Circuit Court Judge in accordance with the South Carolina Rules of Civil Procedure, at the Beaufort County Courthouse, 102 Ribaut Road, Room 212, Beaufort, South Carolina, on December 11, 2015, at the hour of 8:38 a.m.

THOMAS REPORTING SERVICES
156 Argent Way
Bluffton, South Carolina 29909
(803) 206-7390

COPY

Appearances

Representing the Plaintiffs:

GREGORY MILAM ALFORD, ESQUIRE
Alford & Thoreson, LLC
Post Office Drawer 8008
Hilton Head Island, South Carolina 29938
gregg@alfordlawsc.com

GEORGE TRENHOLM WALKER, ESQUIRE
Pratt-Thomas Walker, PA
Post Office Drawer 22247
Charleston, South Carolina 29413-2247
gtw@p-tw.com

Representing the Defendants:

TAYLOR MERIWETHER SMITH, IV, ESQUIRE
Harrison & Radeker, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
taylor@harrisonfirm.com

CONTENTS

Hearing

	Page
Exhibit Index	4
Certificate of Reporter	23
Word Index	

* * * * *

EXHIBIT INDEX

Exhibits: Marked at Page

(None were proffered.)

* * * * *

This hearing is taken in accordance with the South Carolina Rules of Civil Procedure.

JUDGE DUKES: Good morning. We are here on 2015-CP-07-2937. This is Lykins versus Hoagland. This matter comes before me, I believe, pursuant to the rules associated with a T.R.O. without notice, emergency T.R.O., however, I see that Mr. Alford, as is my preferred practice, has done his best to contact the Defendant so that we don't have a situation where the other side is not represented even in these type of situations. Mr. Alford, I'm happy to hear from you, sir.

MR. ALFORD: Good morning, Your Honor. May it please the Court, Gregg Alford on behalf of Ms. Lykins. You know, Your Honor, this is -- this is going to be a tough one. Ms. Lykins' background, although you have probably gleaned it from the pleadings but just for the record Ms. Lykins is a member of the Hilton Head Island Town Council.

And in her -- the course of her political service or her public service there have been an issue that has arisen involving a contract with the Chamber of Commerce.

Mr. Hoagland, the defendant, is an

extremely vocal opponent of anything to do with the Chamber of Commerce. There have been a series of processes which recently resulted in a contract being adopted with the Chamber of Commerce. Mr. Hoagland has appeared at almost every meeting. He has continually -- he's very strong in his opinions, and we respect his right to have those opinions in a public forum. We totally do as it relates to Ms. Lykins' public service.

After a vote was taken that Mr. Hoagland didn't agree with, he has -- well, he has for years, Your Honor, engaged in a -- what I would call a hate -- a course of conduct that is a hate campaign, e-mails to people. And they get -- they've escalated. And they've gone from attacks on issues to personal attacks. And now we have a personal attack against Ms. Lykins at her place of work.

Ms. Lykins is the director of the Hilton Head Island Boys and Girls Club. And what has happened, and I've attached the affidavit of Michael Briggs and of Marty Lick who are volunteer Board members for -- one of them is for the Boys and Girls Club of the Low Country which I guess oversees the Hilton Head Island Boys and Girls Club, the Northern Beaufort County Boys and Girls Club, and the

Bluffton Boys and Girls Club.

So what Mr. Hoagland has essentially done is he's called these people and e-mailed them extensively and said because Kim Lykins didn't vote the way I wanted her to on a political issue, she's a liar and she's not fit to serve and fit to be around children.

So we've crossed now into this interference with contract and harassment. And he's threatened to take out ads that will say that, Ms. Lykins isn't fit to work at the Boys and Girls Club, thereby damaging Ms. Lykins and damaging the Boys and Girls Club, frankly, all over this issue that is strictly related to her public service.

Now, we've been very careful in trying to craft our request for an injunction in that we respect and believe in one's right to disagree in political speech. We are not after that. I just want to be clear. We are looking for something narrowly tailored to stop Mr. Hoagland from contacting Ms. Lykins because he's spewed some hate at her, sent her some terrible e-mails.

We also want him to stop contacting members of the Boys and Girls Club Board regarding Ms. Lykins' appointment. He don't want him -- we

would like to prevent him from having published any derogatory, negative, untrue statements about Ms. Lykins as they relate to her employment at the Boys and Girls Club.

And I need to be real clear here, Your Honor. If he wants to take out an ad -- and by the way, he does it regularly, takes out a full page ad in the Island Packet and trashes politicians. That is fine. If he wants to take one out tomorrow, which we think he might since it's Saturday, and trash Ms. Lykins as a politician, me as a lawyer, and my birddog, whatever, that is fine, but I think what we are trying to protect here is her employment, her right to contract, and frankly the Boys and Girls Club from the harm that is spilling over.

And if you read the e-mails, Your Honor, the vitriol is pretty intensive and it's getting worse. We tried -- I've contacted Mr. Smith last night and I know the Court's preferred practice. I didn't want to come in here without having some opportunity for them to be heard. We attempted to serve Mr. Hoagland twice last night. He was forewarned by the security guard and magically no one was home.

So anyway, I tried to get him here. I'm seeking a temporary retraining order to prevent him from -- and I laid it out in our motion. It's fairly narrow grounds, Your Honor. And I just -- I want him to stop contacting by telephone or e-mail or in person members of the Board of Directors of the Boys and Girls Club of Hilton Head Island or the Boys and Girls Club of the Low Country about any matter having to do with the employment of Kim Lykins, to be enjoined from publishing or causing to be published any negative or defamatory statements regarding the Plaintiff and her employment, and taking any other actions that are intended to harass, embarrass, or otherwise injure the Plaintiff in her profession.

Again, Your Honor, I want to be clear, and I spoke with Mr. Smith at length about this -- well, length for awhile about that I'm not trying to stifle protected political speech. I am trying to protect my client from inappropriate and unwarranted personal attacks involving her employment. That is all I'm trying to do.

Not much more to it than that. We will litigate out the rest of it over time, but there was a direct threat made that he would continue to

publish these things and that they were going to escalate. And we felt like we had to come to the Court for relief. Be happy to answer any questions the Court may have.

JUDGE DUKES: None right now. Mr. Smith, thank you for being here. I'm happy to hear from you, sir.

MR. SMITH: Thank you, Your Honor. I appreciate that. And I was retained by Mr. Hoagland for the limited purpose of appearing at today's hearing. And that was actually last night. So as Your Honor mentioned, I had to make the trip down here. And I apologize, because I don't practice down here very often, Your Honor, so please don't take this the wrong way, but I'm just curious, Your Honor, as Master in Equity do you receive an order of reference to hear this today or are you a special circuit judge as well? I'm just --

JUDGE DUKES: I'm a special circuit court judge as well.

MR. SMITH: I assumed that was the case. I just wanted to inquire about that. And, Your Honor, just so I'm clear as to our procedural posture today, are we here today to hear a temporary restraining order request with notice provided to us

or is this actually for a preliminary injunction or a temporary injunction?

JUDGE DUKES: Temporary injunction. And what I was mentioning to Mr. Alford and thanking him for doing is my procedure here is if there is any way possible to give the side -- particularly if the other side is represented, notice of it, that is always my preference. So even if I were to issue an order in favor of Mr. Alford's position today, you would still be entitled to the 10-day hearing.

MR. SMITH: Okay.

JUDGE DUKES: This is simply an emergency temporary order situation that, I guess, Mr. Alford is looking for. So this would be without prejudice to you or your client to have the normal hearing that we would have in these situations.

MR. SMITH: Okay, Your Honor. And just so I'm clear on that, that would mean that if he disagrees with this order, this order would not be for the pendency of the matter, but would only be for 10 days?

JUDGE DUKES: Correct.

MR. SMITH: Akin to a temporary restraining order?

JUDGE DUKES: Exactly. Exactly.

MR. SMITH: Okay. All right. Thank you, Your Honor.

JUDGE DUKES: It's somewhat confusing, but I just think this works better to have the other side, if the other side is represented, to have at that representation present from the very start.

MR. SMITH: Right.

JUDGE DUKES: It solves a lot of problems for me, at least.

MR. SMITH: Yes, Your Honor. I understand. Well, Your Honor, I think I'll start with pointing out that here considering either a temporary retraining order or an injunction here would be a rather drastic remedy based upon what has been pled in the summons and complaint.

And we have been warned by our Supreme Court that because it's such a drastic and extraordinary remedy that you are always asked to proceed with caution granting any of these.

And, Your Honor, there is a reason which I'll come to later as to why we rarely ever see T.R.O.s in a case involving defamation and intentional infliction of emotional distress or even public disclosure of private facts.

Your Honor, I'll start with the elements of what they must establish. Here they need to establish that but for Your Honor entering an order today, right now, there will be immediate irreparable harm coming to the Plaintiff.

Your Honor, they need to convince you that it is irreparable because what they can't get from you is what you will later award which would be damages. Meaning that is not the repair they can get. If that was then an injunction here wouldn't be appropriate. Instead it has to be irreparable, that harm, such that whether the harm is reparable as applied to this harm, it must be remedied by you now. That is what makes it irreparable.

And here, Your Honor, I don't think that is the case. And I don't think that it could be irreparable harm that she suffered as of this moment because my client to my knowledge isn't even awake this morning. My client isn't going out and speaking untrue statements to individuals concerning Ms. Lykins, nor does he intend to.

I've advised him during the purposes of my engagement, you are being sued for defamation. Anything you say will likely, concerning this person, be evidence used against you in this

proceeding.

JUDGE DUKES: Well, let me stop you there and ask you a question then, and also stop my phone here. Mr. Alford has -- I've read enough of this to know that your client has a concern having to do with Ms. Lykins' vote on council having to do with the Chamber of Commerce.

And I've read the allegations which may be denied, I don't know, but with regard to contact having to do with her employment. And based on what you just said, it almost sounds like you agree that he's not going to contact anyone with regard to her employment. I understand without giving up anything or admitting anything or anything like that.

I mean, if that is the case should we just take a break for a second and you get with Mr. Alford and let's see if we can reach some sort of consent on that? Is that --

MR. SMITH: I haven't been provided the authority, Your Honor, from my client to negotiate about what will be for the pendency of this matter or 10 days or --

JUDGE DUKES: Well, I can give you time to get him on the telephone. I mean --

MR. SMITH: Well, I think, Your

Honor, what he is most concerned about is any order coming from this court that might construe his First Amendment rights in a way that he can't exercise what would be ordinarily protected speech. And I think he's not here because what is attached to this is a voluminous amount of exhibits with a lot of words.

And much of what is in there are opinion statements regarding that of public concern and her role on town council. To the extent there are any statements even made concerning this Plaintiff, Your Honor, many of those statements that can be verified are simply true, but there is not much of either in there.

And what he hired me to do, Your Honor, was just to make sure that if any order does come today that it is narrowly tailored to effectuate the interests of the Plaintiff and not having untrue statements that harm her reputation said.

So I mean, I would be happy to work with them on that. And if you want to give me a few minutes I will be happy to call my client, but understand that our overarching concern is that there would be a T.R.O. issued because he believes that there is no way this Court can issue a T.R.O.

that is sufficiently narrowly tailored that isn't going to have the heavy presumption against his Constitutionality because what it would require him to do is to stop talking by telephone, email, or in person, to stop publishing or causing to be published.

I mean, these are broad things. And if we can find a way to narrow it such that it is just like an agreement I might can call my client with and have the authority to agree with him, then that would be of the same to us.

JUDGE DUKES: I mean, here is the part that obviously, I guess, concerns the Plaintiff because -- I haven't had an opportunity to study all of this, it's a half-inch thick worth of stuff. But, I mean, the part that stuck out in my mind is there is, at least, an allegation that there was contact with her employer at the Boys and Girls Club saying she's not fit to be around children.

Now, that may be completely denied. I don't know, but I guess I'm trying to figure out where the protected speech would be there unless there is actually some allegation that would have to do with children. You know? I mean, it's that sort of thing that I think if I understood Mr. Alford's

argument correctly -- if I understand Mr. Alford's argument correctly they don't -- well, they might care, but they aren't trying to restrain him from taking out full page articles, from showing up at council, from doing whatever is necessary and saying -- and exercising his First Amendment rights.

And she's a public official. You know, she made a terrible decision. You can say it over and over again. That certainly is protected speech and I think Mr. Alford, based on his argument, agrees with that. It's the allegation I guess that the line is crossed when one contacts the employer not about the political issue, but very personally about this person shouldn't have contact with children.

And I guess I'm trying to figure out how that is protected speech. And, again, without issuing an order, why don't you all talk for a second because I think you are saying the same thing. Yeah, I don't think they are even asking for a broad order saying he can't complain about these issues with the Chamber of Commerce. Of course he can and should if he has a concern about it.

MR. SMITH: If you are right about that is what the Plaintiff wants, Your Honor,

because I was retained so late last night, I was operating based upon their motion. And their motion is far broader than what Your Honor just characterized. So I was just -- if that is not what they are going for, which is the publishing or causing to publish any negative statements --

JUDGE DUKES: No. You can't stop that. I agree with you. Why don't we do this. I had, like all of these emergency things, I slip it in between other things. I've got something else at 9:00. I can leave you all here. I can go back across the hall, deal with that one in my other room, and then let you call Mr. Hoagland and see what sort of authority you've got and see if you all can craft something. Is that --

MR. ALFORD: As Your Honor knows, I'm always willing to try that. I just want to say one thing. These two affidavits that were filed, one is the affidavit of Mark Lick. Mr. Lick is the Boys and Girls of the Low Country guy.

JUDGE DUKES: Right.

MR. ALFORD: He recites the exact contact that he had that indicated, he was calling me to demand that Kim Lykins, the executive director of the Hilton Head Island Boys and Girls Club be

fired from her position because she was a liar and was unfit to be around children.

JUDGE DUKES: I saw that.

MR. ALFORD: Exact same words in Mr. Briggs' affidavit.

JUDGE DUKES: Uh-huh.

MR. ALFORD: And I just want Your Honor to -- here is the stuff that -- you are absolutely correct about the -- I think we might be trying to talk about the same thing, but this e-mail November 23rd to everybody including -- well, to Ms. Lykins and to the other council members, you both lied and are not fit to serve. I will look forward to speaking directly to both of you soon at public comment.

Also, you will be in my full page ads to publically disgrace you both to this island. Kim, you are not fit to serve Boys and Girls as well. You fully know what you did.

The line for me is the employment. And I thought I tailored my motion, but I just want to make that point, Your Honor. We will work to --

JUDGE DUKES: Well, the implication and why wouldn't -- one shouldn't be around children is a little alarming too, but why don't you all talk

and see what you can figure out. And, again, it sound like you all don't necessarily disagree on the broad strokes of the thing. So why don't we do this. Why don't we be in recess for about 30 minutes. And if we need longer, we need longer. No problem, but I think we've got this room as long as we need it. And I'll just go across the hall and do my other things until you all tell me you are ready to get back on the record.

MR. ALFORD: Okay. Thank you.

MR. SMITH: Thank you.

(RECESS 8:55 TO 9:31.)

JUDGE DUKES: All right. We are back on the record in 15-2937 after a brief recess. My understanding is counsel has spoken and have come to an accommodation that resolves today's issue. And Mr. Smith is going to put that on the record. Happy to hear from you, sir.

MR. SMITH: Thank you, Your Honor. The Defendant in this matter, C.C. "Skip" Hoagland, has come to an agreement with the Plaintiff in this case that for the pendency of this matter the Defendant will not do the three following things.

One, he will not publish any statement to any third party about the Plaintiff's employment at

the Boys and Girls Club. Second, he will not refer to the Plaintiff's fitness in her job at the Boys and Girls Club or her fitness to be around children. And third, the Defendant will not refer to the Plaintiff's employment at the Boys and Girls Club in any statement to a third party. That is the extent of the agreement.

JUDGE DUKES: All right. Thank you. Mr. Alford, is that your agreement as well?

MR. ALFORD: Yes, Your Honor. Thank you. It is exactly what he stated.

JUDGE DUKES: Okay. All right then. Can I ask one of you to prepare that order? Who would like to prepare the order?

MR. ALFORD: Mr. Linton will be happy to do that as soon as he gets back to Charleston. And he will forward it to Mr. Smith for his review and then to the Court.

JUDGE DUKES: Fantastic. Just get it to Heather with an affirmation that everyone has seen it and that kind of thing and I will sign it as quickly as possible. All right. Thank you both and all for resolving the issue and good luck to you in the future of the case. Anything else for the record?

MR. ALFORD: Nothing for the record. Thank you, Your Honor.

JUDGE DUKES: All right. Thank you. That completes the record.

(Whereupon, the hearing was concluded at 9:32 a.m.)

Certificate of Reporter

I, Deborah S. Thomas, Certified Verbatim Reporter and Notary Public in and for the State of South Carolina, do hereby certify that I reported the hearing of Lykins v. Hoagland, on the 11th day of December, 2015: and that the foregoing 22 pages constitute a true and correct transcription of the said hearing.

I further certify that I am neither attorney nor counsel for, nor related to or employed by, any of the parties connected with this action, nor am I financially interested in said cause.

I further certify that the original of said transcript shall be hereafter delivered to JOHN P. LINTON, JR., ESQUIRE, Pratt-Thomas Walker, P.A., 16 Charlotte Street (29403), Post Office Drawer 22247, Charleston, South Carolina 29413

In witness whereof I set my hand and seal this 1st day of July, 2016.

Deborah S. Thomas, CVRM
and Notary Public for the
State of South Carolina

My Commission
expires 1/4/18

DEBORAH S. THOMAS NOTARY PUBLIC SOUTH CAROLINA My Comm. Exp. 01-14-2018

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

STATE OF SOUTH CAROLINA
FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT
COURT OF COMMON PLEAS
CASE NUMBER 2015-CP-07-02937

KIM LIKINS — PLAINTIFF

VERSUS

C.C. HOAGLAND — DEFENDANT

JANUARY 30, 2018

TRANSCRIPT OF HEARING

BEAUFORT, BEAUFORT COUNTY, SOUTH CAROLINA

BEFORE

HON. R. LAWTON MCINTOSH, JUDGE

WANDA H. ROWE, CVR-M
OFFICIAL COURT REPORTER

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

APPEARANCES

ON BEHALF OF PLAINTIFF
KIM LIKINS:

HON. GREGORY M. ALFORD
ALFORD LAW FIRM, LLC
18 EXECUTIVE PARK ROAD
SUITE 1
HILTON HEAD ISLAND, SOUTH CAROLINA 29928
843-842-5500

and

HON. JOHN P. LINTON, JR.
WALKER, GRESSETTE, FREEMAN & LINTON, LLC
66 HASELL STREET
POST OFFICE BOX 22167
CHARLESTON, SOUTH CAROLINA 29413-2167
843-727-2200
Linton@WGFLLAW.com

Plaintiff Kim Likins was present.

ON BEHALF OF DEFENDANT
C.C. HOAGLAND:

HON. BARRETT BREWER
CLAWSON & STAUBES, LLC
126 SEVEN FARMS DRIVE
SUITE 200
CHARLESTON, SOUTH CAROLINA 29492
843-557-2026
bbrewer@clawsonandstaubes.com

Defendant C.C. Hoagland was present.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

INDEX

Caption.....1

Appearances.....2

Index.....3

By the Court.....4

ATTACHMENTS

Certificate of Reporter.....44

EXHIBITS

No exhibits were admitted.

COPY

BEGINNING 2:05 P.M.

BY THE COURT:

THE COURT: All right. We're here in Likins versus Hoagland. First matter we're going to take up today is the rule to show cause as to Mr. Hoagland's conduct in violating a gag order issued by me. Plaintiff's motion. Be glad to hear from them.

MR. LINTON: Yes, your Honor. John Linton on behalf of the plaintiff. I've got a notebook of all the filings related to this motion, if your Honor would like it to --

THE COURT: Filings? If they're filed, that doesn't violate the order. I don't care if it's filed. What do you mean by *filed*?

MR. LINTON: Things that the parties have filed with respect to this motion. If they're on the computer -- organized with tabs, so we went through -- your Honor, we're here for a contempt motion on your honor's order related to communications to third parties.

THE COURT: And let me stop you there. I apologize to you. We had a phone conference last week between the parties. After the discussion, I felt like I didn't need to issue a rule to show cause. However, after discussion and phone conversation, I did, out of an abundance of caution, to make sure that the relief

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

that's been requested would be available. Go ahead.

MR. LINTON: Thank you, your Honor. And the order that we're here about today is the order that your Honor entered after the plaintiff filed a motion related to the conduct after mediation in this case, where the settlement demand made by the plaintiff was disclosed to the media and others over email by Mr. Hoagland. By that time, your Honor decided that that was not a violation of the ADR rules, but given the history and what has gone on in this case, decided to enter an order to protect the court's process and to make sure that this case proceeded to trial without distraction. And as your Honor is well aware, that order precluded anybody involved in the case, whether it be the parties or the lawyers, from any extra judicial comments to third parties, members of the media, or in this case, witnesses as well.

And we're here today because the plaintiff was basically, in our eyes, forced into a situation where we had no other choice but to come to this court and say we need help. This order has been violated, and a lot has gone on. And there in that notebook are the original motion for rule to show cause, with exhibits; supplementary motion and memo that lays out the law applicable to a civil contempt motion, which requires

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

the moving party to show by affidavit or verified petition that the order has been violated.

THE COURT: Well, let me tell you this. I reserve the right to treat it either civil or criminal. So go ahead.

MR. LINTON: Yes, your Honor. And what I think will be the easiest thing to do is, rather than try to read through these emails or recite the history, is just to point the Court to the two filings that the plaintiff feels are most significant, and that's the affidavit that was filed with the supplementary motion, and then a supplementary affidavit that was filed last night. And these are two affidavits from Mr. Alford, and all they say is these are authentic copies of the emails received, and they're all emails that were sent by Mr. Hoagland. In that notebook, we tabbed emails 1 through 5 with respect to the first affidavit, and then kept that numbering system, 6 through 12, with the second. And I know that the Court has had an opportunity to review all of these, so like I said, --

THE COURT: No, I haven't. I mean, the email to me last night, I haven't seen; I haven't heard of; so I have not read it.

MR. LINTON: Okay. Then I will go through these. And I want to point out the several portions of them

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

that violate the order.

THE COURT: Sure.

MR. LINTON: So the first -- Email 1 -- and much of this is quoted and recited in the memo that was filed a few weeks ago.

THE COURT: Tell me where I am. Am I looking at Exhibit B --

MR. LINTON: Yes, sir.

THE COURT: -- through --

MR. LINTON: Exhibit B. I know there's a tab that says Email Number 1.

THE COURT: Okay. I'm -- oh, okay. Okay.

MR. LINTON: And this is an email that Mr. Hoagland sent to the lawyers involved and copied the Attorney General and SLED agents and others. And what I want to point out about this email are these are items that are directly related to this case that he's discussing; and these are two third parties; and that they are direct communications to the other lawyers in this case. And the order that your Honor filed expressly prohibited the parties from contacting lawyers directly.

He addresses myself and my partner, Trenholm Walker, several times. And says things like: Mr. Linton/Walker, you're in bad company and receiving bad advice from crook lawyer Alford and being used by the

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

crooks of Hilton Head as their puppet lawyers free works. I can assure you the stolen 200,000 tax money you were paid with knowing this was stolen must be paid back to taxpayers.

And like I said, I'm not going to read all of these, but that right there is our first exhibit; first email; it is directly to the lawyers; it's also to third parties; it's discussing the case.

And down towards the end you'll see the last -- third-to-last paragraph that starts *Mr. Linton*, and you will see where Mr. Hoagland, addressing me directly, says that I'm a dirty lawyer; I've learned dirty tricks at a young age; I'm not -- and it moves on to a sort of closed threat that I'm not prepared to deal with someone like him.

And then, the paragraph following that starts lying Linton. He says: *I called Trish Heichel yesterday.* And the reason that's important is, this email is sent the day after Mr. Hoagland's attorney took Trish Heichele's deposition in this case. So what we have here is an email from Mr. Hoagland, which, in itself, violates the order. And then he says, hey, by the way, I called the witness from the deposition yesterday directly, and I told her what a liar you are and how you made up all this stuff.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

And the reason I bring that up, your Honor, is I expect from the reply they've filed that Mr. Hoagland's response to our motion is going to be that most of these comments were about other case. And this is one that is particularly specific to this case, because it involves calling a witness right after their deposition in this case.

So moving on through the emails, the tab Email 2, if we turn to the fourth page down at the very bottom, there's just two lines left. Says:

Not only is the town lawyer, Greg Alford --

THE COURT: Hang on. Where is this, now? This is the fourth page in?

MR. LINTON: This is the -- the fourth page in, your Honor, yes.

THE COURT: Starts with *not only*?

MR. LINTON: Yes, your Honor. At the very, very bottom of the page, the last two lines.

THE COURT: Mine stops at *nonprofit corporation at laws*, and then it's cut off. Is it E.L.1?

MR. LINTON: E.L.2. Well, I guess if you -- I was counting the cover page of Email 2.

THE COURT: Oh, oh.

MR. LINTON: So it'd be the other page of the

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

email.

THE COURT: I'm sorry. Okay. Okay.

MR. LINTON: Okay?

THE COURT: Okay.

MR. LINTON: The paragraph starting:

Not only is town lawyer, Greg Alford, part of 200k theft, he is also in violation of his town lawyer contract profiting his stolen 200k and tax monies.

And then it goes on, and at the top of the next page, the following paragraph, which starts *further*, he starts discussing an order that was issued in this case earlier in the case by Judge Dukes that was a consent order the last time we were here on a contempt motion. And it was for violating an order that precluded a publication in the paper referring to Ms. Likins' fitness to be around children, after the case had already started. And there was a consent order entered as part of that, that Judge Dukes signed. And here, he starts to attack Judge Dukes and the fine that was agreed upon as part of that order. And that's, again, directly related to this case.

THE COURT: Let me stop you. You know, to the extent you previously sent these emails to me and copied opposing counsel, I have read those. I'm familiar with

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

all these. I will point out that not only has Mr. Hoagland written to opposing counsel about this case, he's decided to engage in the course of writing the Court about this case. In fact, I have two emails my law -- my assistant just sent me that apparently came in this weekend. One dated January 27, 2018 from Mr. Hoagland at 6:24 p.m. And then there was another January 26, 2018 at 5:36 p.m. from Mr. Hoagland.

We don't need to go through all the emails. I'll point out, though, some of the emails that were incorporated in your submissions to me would not violate the order, because they're just general discussions. It may not be a good idea to send opposing counsel general correspondence, but it would not be in violation of the prohibition against discussions about this case. Okay? But.

Mr. Brewer.

MR. BREWER: Thank you, your Honor. Your Honor, we addressed this issue with your Honor June the 1st, is when we had this hearing. And at that time, when the Court brought up the issue of a gag order, I think that the first argument I had -- and we just got a copy of that transcript today. Did you get a copy? I just got a copy today.

MR. LINTON: I looked at one.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

MR. BREWER: I haven't even had a chance to find where we talked about yet, because it's 136 pages. But the bottom line, that we discussed that my client is a political activist. He does have many lawsuits going. And the argument I raised to the Court at the time was that --

THE COURT: Well, now -- now -- hey, listen, I don't want to hear about your argument about these issues. A gag order's been issued. I want to know what he has to show cause -- what he has to say to show cause why I shouldn't hold him in contempt.

MR. BREWER: Well, exactly what Mr. Linton brought up and we published in our motion, that he got six different -- or responsive pleading. I'm sorry.

THE COURT: I am over one. I am over one case that Mr. Hoagland's on.

MR. BREWER: Yes, sir.

THE COURT: He's sending me emails.

MR. BREWER: Understood, your Honor.

THE COURT: Can you tell me how he can explain that away.

MR. BREWER: Well, first off, your Honor, I think Mr. Hoagland simply -- he obviously -- I will tell you, between the Court and myself, I clearly did not authorize Mr. Hoagland to make those comments.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

THE COURT: That remains to be seen, Mr. Brewer. To be quite frank with you, I've never seen lack of control of a client as bad as this case, quite frankly.

MR. BREWER: Your Honor, I appreciate the perception of that. I can tell you --

THE COURT: Well, that is my perception. I'll be candid with you.

MR. BREWER: I understand. I'd be happy. Actually, I would probably like the Court to ask opposing counsel about my efforts to do otherwise, if I could.

THE COURT: Well, and I'm not indicting you. But I'm just telling you.

MR. BREWER: I understand, your Honor. I mean, if this is about me today, I'll be happy to tell you. I can tell you I've done whatever I can, and my file's well documented in that context.

Mr. Hoagland is his own beast. Okay. He wants to be heard.

THE COURT: Sure.

MR. BREWER: He wants to speak directly to the Court.

THE COURT: Well, he already has. He's been emailing me.

MR. BREWER: I understand. And quite frankly, I

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

mean, he's given me three copies of speeches that he'd like to tell you about today. And he wants to talk about it, and I'm inclined to let him do it. Here --

THE COURT: Let me tell you something. You're not running this courtroom today. I am. Okay? So whether you're inclined or not is not an issue.

MR. BREWER: No, no. No. I understand, your Honor. What I mean by that is, against my better judgment, if the Court would like to hear from him, --

THE COURT: Okay.

MR. BREWER: -- I'm inclined to allow him to do what he wants.

THE COURT: Well, let me ask you this. And I know --

MR. BREWER: I apologize.

THE COURT: I apologize to you. Let me say this.

MR. BREWER: Yes, sir.

THE COURT: I'm not going to let him stand up and make this courtroom one of his screaming pulpits. Okay?

MR. BREWER: I understand.

THE COURT: On the other hand, I'll be glad to hear from your client with regard to any rationale or explanation he may have as to why he has obviously, obviously violated this Court's gag order.

MR. BREWER: The way I -- the only way I know to

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

phrase it to you, your Honor, is this, is he has *First Amendment* rights that involve other matters that he has to speak about. He has other cases that are going on that are tangential and involve the same facts, the same actors. In fact, one of the federal court cases he has going on right now is the one that your Honor declined to retain jurisdiction over. And if you'll recall, back on June 1st, Russ Keep was here as a co-counsel of mine for Mr. Hoagland. And he was making a motion to amend to add counterclaims back in this case against the Town, its attorneys, regarding this misuse of $200,000.00. And if you'll recall, the Court's ruling was, well, I'm going to decline to do that because you've got another suit pending in federal court right now.

THE COURT: Mr. Brewer, your argument is your client didn't know? Is that really what you're argument's going to be today?

MR. BREWER: Your Honor, my argument is that he is not --

THE COURT: Yes or no?

MR. BREWER: Yes, your Honor, my argument is that he is allowed to speak about other cases he has, and that he has not discussed --

THE COURT: He's allowed to copy me on them? Are you serious about that?

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

MR. BREWER: Your Honor, I'm not saying -- he is not discussing -- the only thing he's doing with the Court -- I mean, I've never had a client that's emailed a Judge.

THE COURT: Mr. Brewer, I can read as well as most people. Some may argue that point. But I feel like I can. I don't need you to tell me what he's telling me, because I read them. Okay?

MR. BREWER: Sir -- your Honor --

THE COURT: And they are violating the gag order without question, clearly, convincingly.

MR. BREWER: Understood, your Honor.

THE COURT: The question is, does your client -- you might want to talk to him. Does he really want to speak today? I'll be glad to put him under oath and let him speak. He's not going to get up and make a speech. He can explain his actions, and I'll be glad to listen, because he's subject to going to jail today.

MR. BREWER: I'm happy to talk to him for a second, your Honor.

THE COURT: Talk to him for me and make sure that's what he wants to do, okay?

MR. BREWER: Okay.

MR. BREWER SPEAKING WITH CLIENT.

MR. BREWER: Thank you, Judge.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

THE COURT: Okay, sir. I'm going to take your Honor up on it.

THE COURT: Well, I'm going to step out. And would you send word back, please, Mr. Brewer.

MR. BREWER: We'll take five minutes.

THE COURT: Thank you, sir.

OFF THE RECORD 2:21 P.M.

BACK ON THE RECORD 2:31 P.M.

BAILIFF: All rise. This court is now in session.

THE COURT: Please be seated. All right, Mr. Brewer, have you had a chance to discuss with Mr. Hoagland whether or not he wishes to testify?

MR. BREWER: I have spoken to Mr. Hoagland, your Honor. Well, let me ask this. The way you had brought it up, he is -- I had mentioned last week that the process of this is -- I haven't gotten this far yet. If Mr. Hoagland even wanted to speak, I mean, he'd go on the stand and be sworn under oath, and I would examine him as a --

THE COURT: And he'll be subject to cross-examination.

MR. BREWER: Sure. I mean.

THE COURT: But, and make sure, Mr. Brewer, you understand the purpose of this testimony is not to make a political speech; it's to address the rule to show

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

cause and complaint. Okay?

MR. BREWER: I do understand that, your Honor. I truly do.

THE COURT: Okay. Thank you.

MR. BREWER: All right, Judge, I talked to Mr. Hoagland in back. He wanted me to express to the Court, (1) that he was sorry, but because of his -- he wants to apologize to the Court. The only way he understands this is, he tried to do the best he can to comply with the gag order. And given his other six lawsuits, he feels he has the *First Amendment* right to talk about those, and doesn't know how to separate those lawsuits and what he believes he's allowed to do in those lawsuits versus what the Court's order was in this case. And that is the simplest way I can explain it.

THE COURT: Okay. So he does not wish to take the stand?

MR. BREWER: He has asked me to make the statement for him, unless, for some reason, the Court would like to hear from him.

THE COURT: No. I'm ready to rule.

MR. BREWER: All right. Thank you, your Honor.

THE COURT: All right. Mr. Hoagland, I don't buy that for one second. You're intelligent and articulate. I've read your emails. You know how to address the

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

issue. You are in contempt of this court. I am going to decide whether or not it'll be criminal contempt, which means you'll go to jail; or civil contempt, which means you're given the keys to the jail. I am also reserving the right to levy financial fines or sanctions, and that's going to be done as soon as this case is over with. Okay, sir?

What I want to do is keep something over your head, quite frankly, Mr. Hoagland, to make sure that you act the way you're supposed to, according to the order. You may disagree with it. I understand. I have people disagree with me every day, but you have to comply. All right, sir? And this idea that you think -- you don't know you're violating an order when you email me is beyond imagine. Okay? I've, quite frankly, practiced law for over twenty years. I've been a judge for about ten years. I've never seen a conduct -- a participant in a lawsuit conduct themselves as you have in disregard to orders, blatant disregard. Even criminal suspects in murder cases conduct themselves on a more behaved basis than you have.

And so, I am to determine what sanctions you get at the end of this case. I will tell you, quite frankly, Mr. Hoagland, that if you will conduct yourself as you're supposed to in this case, it will ameliorate a

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

lot of the stain right now. I can't, you know, put a gag on you as far as physically or tie you down, but you may be your worst enemy or you may be your best friend at the end of this case, because the less conduct that we have in violation of this order in this case, the better it's going to be. Do you understand? Mr. Brewer explained to you.

I'm fussing at Mr. Brewer, because lawyers have obligation to try to control their clients. Quite frankly, I gave him a hard time. I know that he's been trying to control your conduct, and you just won't do it. And it's just not satisfactory.

So, at the end of the case, if you have conducted yourself like you're supposed to, there probably won't be much damage done. On the other hand, if you don't, I don't mind, and I can tell you, I can put you in jail and put you in jail for a good period of time. If I feel strong enough about it, we'll convene a jury, because that means I can put you in jail more than six months. And you don't want to do that. I'm just telling you, you don't want to do that.

That being said, some of his emails, even the ones to me, don't violate any rules. He says, I'm a citizen. He's a citizen. He has a right to say what he wants to say in that regard. If it pertains to this case is

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP702937

where the violation comes. Okay? You understand that? Smarter move, but -- hold on. It doesn't violate the gag order, except for the prohibition that you cannot contact attorneys directly. I think I put that in the order; did I not?

MR. LINTON: Yes, your Honor.

THE COURT: Okay. You are not to contact lawyers. Do I need, Mr. Brewer, to amend my order, because it's effectively, I mean, now that he's not to contact the court or my staff. Do you understand that, Mr. Brewer?

MR. BREWER: Yes, sir. Yes, your Honor, I do.

THE COURT: Okay. So --

MR. ALFORD: Your Honor, if I may?

THE COURT: No, sir, not yet.

MR. ALFORD: Yes, sir.

THE COURT: Mr. Hoagland, do you understand?

MR. HOAGLAND: Yeah.

THE COURT: Let me make sure you do. I know you feel like people are beating up on you. Quite frankly, some of the issues you raise I think are pretty legitimate issues. Okay?

MR. HOAGLAND: Thank you, your Honor.

THE COURT: I'm not asking you to thank me. I'm just telling you, though, the process we're following is going to be followed the way I asked you to, because

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

that's my job is to control this courtroom. Okay? So do not email opposing counsel. You definitely don't email Ms. Likins. Don't email my staff or me. Okay, sir? You know, what you do in those other cases, that's up to those lawyers and those judges. All right? But in this case, do not do it again, all right?

MR. HOAGLAND: Okay.

THE COURT: All right. Now, go ahead.

MR. ALFORD: Remind me.

THE COURT: I'm sorry. I mean, I just wanted to get that out of the way. I'm amending it to include me. I just never -- never thought I'd have to do that, but guess what?

MR. BREWER: It's understood, Judge.

THE COURT: Every day's another day.

Now, to the merits. Now, there was a motion to quash additional depositions, or have they been taken? I know the summary judgment motions continued at your request, right?

MR. BREWER: Yeah, and Mr. Linton and I requested just so we could handle this and take care of all this, your Honor. And we can, at the conclusion of this, can talk to the Court about when would be the Court's pleasure to schedule it.

THE COURT: Do the summary judgment. Would you

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

prepare me an order finding him in contempt.

MR. LINTON: Yes, your Honor.

THE COURT: And holding in abeyance whether it will be treated as criminal contempt or civil contempt; and to be -- to reconvene that issue at the end of the case, whether by settlement or jury verdict; and that action from now until that time will weigh heavily towards what sanctions the Court will issue in the case?

MR. LINTON: Yes, your Honor.

THE COURT: All right. Thank you. So what do I have now? I thought I had -- I had a list.

MR. BREWER: Well, your Honor mentioned -- I think the rest of these can be relatively quick, your Honor, to be frank with you. I think the rest of the motions can go relatively quickly.

THE COURT: Okay.

MR. BREWER: You mentioned the motion for protective order, which I filed. And it just had to do with some depositions. And I understand, by the way, no matter how the Court ruled, we'll address the -- when the depositions can be taken, but the hard deadline was January 31st, which is tomorrow, day after.

THE COURT: Let me tell you this -- or ask you this. Have you guys spoken to each other about going forward or not? I mean, normally, that's what I'd want

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

you to do. These are scheduling orders, so they're not inviolate. And if you all can agree, I certainly don't care.

MR. BREWER: Sure. Well, we have really finished, you know, with the Court. When we last spoke to the Court, we had depositions, we worked really hard this month, and we got, really, all of them done.

THE COURT: Great.

MR. BREWER: With the exception of these two, and these are two that Mr. Linton proposed to us.

THE COURT: And you feel like they're harassing and it won't lead to discovery.

MR. BREWER: Well, and they're also in violation of the discovery order to the extent that these witnesses weren't named. Mr. Linton approached me in December wanting to take the deposition of a lady named Linda Rew.

THE COURT: Linda Rew?

MR. BREWER: R/e/w. And Katina Beasley.

THE COURT: Okay.

MR. BREWER: And I'll be very frank, your Honor, the Katina Beasley one is really what drives the protective order. Both of them, we believe, are in violation of the scheduling order. Although, in fairness to my co-counsel, because they've been fair to

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

us, we've been relative good about working with each other on discovery issues.

THE COURT: Who is Ms. Beasley and where does she work?

MR. BREWER: The allegation was and that -- that Mr. -- and I hate to quote an off-the-record conversation, but this is the way it came up. Mr. Linton called me and just basically said I want to take the deposition of Ms. Beasley. I asked him what the purpose of that was. And very succinctly, he told me that there had been some rumors floating around that this was a mistress of Mr. Hoagland's.

THE COURT: Oh. Well, no, we're not going there. That has no relevance to this case. That's just not --

MR. BREWER: And that's why we filed a motion for a protective order.

THE COURT: Absolutely granted.

MR. BREWER: And they may have different grounds, but that's -- like I say, I hate to repeat it, but that's what I've been told.

THE COURT: If that's what they're trying to discover, that allega -- that fact, you're not going there.

MR. ALFORD: I understand, your Honor. And it's not that at all. I respect that. I understand how you

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

would react that way. I do. It, frankly, is more of a credibility issue, and of an issue -- one of the things that's material in this case is been malice. Right? I mean, you know, that's going to be an issue.

THE COURT: Well, yeah, she's a public figure.

MR. ALFORD: One could argue.

THE COURT: One can probably be -- rule.

MR. ALFORD: One might rule.

THE COURT: That's right.

MR. ALFORD: I understand.

THE COURT: Very good.

MR. ALFORD: So that's why -- I understand. And the conversations that one might have with their friends and with people that they are comfortable with may be more enlightening than just conversations with a person about how they felt about comments they made about --

THE COURT: Do you have any knowledge of this, or are you just going fishing?

MR. ALFORD: She has contacted other defendants -- I'm sorry -- other plaintiffs that are involved in being email bullied and keyboard bullied and accosted and yelled at and, you know, and the mayor of Bluffton has an action filed against him. We believe that that -- and she contacted counsel for -- she's actually contacted one of the witnesses in this case that Mr.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Brewer named and deposed, and said, you know, I have things to tell you about this, if you can protect me. I don't know what that means.

She also contacted -- left a voice mail with Mr. Finger's client, Mrs. Sulka, to the same effect. And that's why. Because there may be -- and look, there's one thing taking depositions and there's kind of things -- it's a whole nother matter if the court -- you know, if it's not there, it's not there, and it's not admitted. I mean, we're not -- we're not looking to --

THE COURT: So, allegedly, this lady has information about the motives of Mr. Hoagland and making these kind of --

MR. ALFORD: Motives, thinking, yes, sir. And I mean, we didn't -- we didn't go find her. She --

THE COURT: Okay. So she wasn't reasonably available. Now, let me tell you something. To the extent that there is some rumor or innuendo that there is more than a relationship, you're not going there.

MR. ALFORD: Fine.

THE COURT: And Mr. Brewer will stop the deposition and call me, and it will be stopped and cancelled.

MR. ALFORD: I understand. All we want to know is how long have you known him.

THE COURT: Yeah.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

MR. ALFORD: How do you know him; have you talked about these issues within what he's saying. The other thing we might want to delve into would be some financial questions, because, according to Mr. Hoagland, and he takes great pride in the fact he doesn't own anything on Hilton Head; he doesn't -- he's not a resident; he's not a taxpayer; he --

THE COURT: Well, I mean, let me tell you something. I don't -- I have no problem with you taking one of these depositions late, but especially under the circumstances where she just appeared. Regardless of the personalities involved and the emotions involved, you know, going to that level of questioning and that kind of stuff, it's just not appropriate and not going to be allowed. But anything else that would be relevant to the suit, I'm not going to try to bar you from doing that.

MR. ALFORD: Yes, sir. And I will stay within those boundaries, and I'm sure Mr. Brewer will keep us there.

THE COURT: Say that again.

MR. ALFORD: We will stay within the boundaries that the Court has issued.

THE COURT: Now, who is this other person?

MR. ALFORD: And that takes us to another

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

credibility issue. Ms. Rew is a business owner on Hilton Head Island, who we don't know if she is part owner, owner. She was apparently in business with Mr. Hoagland in a --

THE COURT: In business?

MR. ALFORD: Yes, sir, in a company called Island Communications.

THE COURT: Does she have an attorney?

MR. ALFORD: Yes, sir, she does, Mr. Scarminach. And we spoke with him. We sent a subpoena, and we tried to do it, and Mr. Brewer filed his motions, because there's a representation made by Mr. Hoagland about this financial situation, he doesn't have any business interest and those kind of things. And we just want to explore that. And I think that's legitimate both from a credibility perspective and just to find out what's there.

THE COURT: Mr. Brewer. Mr. Brewer.

MR. BREWER: If I can be can be heard briefly, your Honor.

THE COURT: Well, I think your client wants to talk.

MR. BREWER: Oh. Yes, sir.

MR. BREWER IN DISCUSSION WITH CLIENT.

MR. BREWER: Your Honor, with regards to Ms. Rew,

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

what I understand they'd like to get out of her, she is an owner of a business that Mr. Hoagland used to own. The way I look at this, this is along the lines of a supplemental-proceeding-type question; that they're trying to track down assets, which is the type of deposition you would take after there's a judgment or after there's a verdict.

THE COURT: I don't necessarily disagree with that, but at the same time, it could lead to some other issues in this case. I don't see any harm to them, even if it is only about supplemental-type issues, so be it, so they can't use it in this trial.

MR. BREWER: Given the Court's ruling on the taking the depositions and the timing of the discovery order, the only thing we'd like to request from the Court is this. If Mr. Hoagland believes that depending on what the information is that comes from those depositions, that may make a couple of other, let's say, rebuttal witnesses or depositions irrelevant, and so, we'd just like leave to come back to court and say based on the testimony, we believe --

THE COURT: Sure. If you feel like you need more, you all discuss it first, and then contact me. We'll have a conference Call, and then we'll go forward.

Now, we don't want to go run down the sides streets

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

and Miss the main point. The main point is whether or not there's defamation.

MR. BREWER: I'm with your Honor.

THE COURT: Okay. All right. So granted. Is there a time period, you know, with restrictions, is there a time period?

MR. BREWER: So it'd be my motion. My motion is what's granted in part and denied in part basically as to --

MR. ALFORD: He had a motion to quash the entire thing. So I think his motion --

THE COURT: You had a motion to compel, I saw.

MR. ALFORD: Yeah --

MR. LINTON: No.

MR. ALFORD: No, we did not, your Honor. I'm sorry.

MR. BREWER: Yeah, so I'm assuming you're going to want me to prepare an order based that says granted in part, denied in part, within these parameters, basically?

THE COURT: Right. Yes, that'd be good. Okay. I'm looking. I have rule to show cause/protective order. That's what we just done. Also to allow requests for admissions, supplemental discovery requests admitted and summary judgment is asked.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

MR. BREWER: Yeah, that's what I -- we can make that one real easy. They're all basically the same thing. Okay. If you remember back earlier, at the end of the discovery order, there was -- we were supposed to have the discovery completed, and just finish the depositions. Well, as these depositions have gone forward, we've identified most of them, public records, things that are open to the public, things that we just would like to make sure we can use later in the trial or in subsequent motions. And so, because of the way I understand Mr. Linton's reading, I was required to file a motion to allow me to supplement my discovery, right? So most of those things, I think we've worked out, except the request for admission. Is that correct?

THE COURT: Is that correct?

MR. LINTON: Yes, your Honor. Basically, obviously, we have no problem with supplementing their discovery responses.

THE COURT: Well, you have to do that under the rules anyway.

MR. LINTON: Exactly. But the order prohibited serving new discovery requests, and for their serving new requests for admission, even if it's for the authenticity of documents. It's well after the deadline and it's for -- you know, is it a couple hundred pages

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

of a Facebook printout. And it says, you know, do you agree that this is authentic and admissible. And we just feel like and there's no need for that to be done. They could have done that for the last year and a half before that deadline was up. But we had a Call about that earlier, and I think Mr. Brewer raised it, and the Court said you really -- the Court required them to go to the Court and seek leave before serving them. And they just served them. And now they've moved to deem them admitted and to serve them.

MR. BREWER: Well, and to file a motion to allow them be done. Judge, all it was, was we printed off for Ms. Likins' deposition and produced to them in advance of their deposition a copy of her Facebook profile. And that prints out.

THE COURT: You know, whether she admits or denies it, you'll be able to try to get it authenticated and admitted at trial. That's not going to stop you. Let me just say -- let's go back.

MR. BREWER: So that was really the only contested issue, and then is whether she'd be required for the requests for admission to --

THE COURT: I'm not going to make her do that, okay. And it's not without prejudice -- without prejudice to you.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

MR. BREWER: Sure.

THE COURT: Go any way you go through.

MR. BREWER: Understood, your Honor.

THE COURT: Quite frankly, I've always looked at somebody saying these are authentic is just saving, you know, the witness time. So it would be looked at from my perspective as not wasting time bringing people up here to authenticate something that's unnecessary.

Now, admissible? you know, that's a whole nother -- nother, you know, horse of another color.

MR. BREWER: Yeah, I don't think I asked about that in terms of admissibility, but if I did, I'd be happy to redact it to terms of authenticated, this is your Facebook page.

THE COURT: Well, that is equated with you try to get together and look at as many exhibits that you can stipulate to as being admissible as possible before trial. And then, you know, have your fights, but not have to lay your foundation for every single document, because it sure does expedite the process.

MR. LINTON: Yes, your Honor. It's certainly before trial we expect to get together with them and to have those discussions.

THE COURT: Okay. So we had a rule to show cause; we've been found in contempt. We have the protective

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

order granted/denied, and that's Mr. Brewer. Mr. Alford, you doing the -- who's doing the order from the plaintiff? I'm sorry. You're doing the first one. I know. You're doing the contempt order, right?

MR. LINTON: Yes, your Honor.

THE COURT: Supplemental discovery to allow requests for admissions is denied. How about supplemental discovery? Is that all the same thing?

MR. BREWER: All that was. I think Mr. Linton conceded that we didn't need to file the motion. It was just to supplement records we'd like to use, so.

THE COURT: Okay.

MR. BREWER: So, to that extent, I would consider that resolved.

THE COURT: Okay. So the summary judgment's continued to let you brief, because you moved offices, right?

MR. BREWER: Yeah, I moved offices, and was having a hard time getting it to Mr. Linton timely enough for him to brief it as much as he wanted. He brought it up, and I thought that was a good idea that the Court allowed, and the Court agreed. And so, what we'd like to do, I guess, is get together with you and find out when will be the next best available date to argue that in front of you.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP070293

THE COURT: I don't have my schedule with me. I don't really have a schedule down here for a while.

MR. BREWER: I don't personally mind -- they may have an objection. I don't mind going to see you somewhere. I mean, that would be okay with me.

THE COURT: Have you ever been to the upstate, buddy?

MR. BREWER: It's God's country.

MR. ALFORD: It's hard to get to.

MR. BREWER: God's country.

THE COURT: Bring your gun and your knife.

MR. BREWER: Well, and Judge, there's a real practical reason for it. You know, the main thrust of that summary judgment motion is, effectively, the public figure issue and some disagreements I anticipate we're going to have. And --

THE COURT: Right. Let me tell both -- or everybody, all three of you. It's been my thoughts all along that Ms. Likins, for purposes of this action, would be deemed a public figure. She's a city councilwoman. I think that the attorneys in here would probably be public figures. I'm just telling you, but I think that she, being an elected official, is going to be. Now, I'm going to let you argue, but I'm just giving you my thoughts ahead of time.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

MR. BREWER: And that being said, Judge, the only reason we would like that, that main issue addressed, that's the crux of it, really, is because that, I think, has a lot to do with the time we spend preparing for trial, what the results of that would be and the course is -- the course of work.

THE COURT: What else do you all need to do to get ready?

MR. BREWER: Well, once we figure it out --

THE COURT: I mean, just generally.

MR. LINTON: I think it would just be those two depositions, your Honor, which should be done in the next month.

THE COURT: Have you got to the point where you can get a general assessment of how long you think this thing's going to take?

MR. ALFORD: Well, your Honor, that's going to be a function, frankly, of the Court's exercise of discretion as to what's relevant and what's not. I would respectfully submit that I have sat through eight or nine depositions that are utterly irrelevant. In three or four of them, Ms. Likins' name wasn't even mentioned. They dealt with the Chamber of Commerce. That's all they dealt with.

I will tell you that you can expect motions

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

regarding executive privilege regarding how Town Council acts and votes. And I think that's pretty clear law from the United States Supreme Court, as well as the South Carolina courts. So I think --

THE COURT: I'm not familiar with the local -- I mean, South Carolina cases on this.

MR. ALFORD: Yes. I'd by happy, and obviously, it's my duty to present those to you, and I will.

THE COURT: Please do.

MR. ALFORD: And so, I -- other than -- and I think it would be helpful at the time the Court, you know, as it relates to summary judgment or whatever motions are out there, I think it would be helpful for us to have a hearing and a status conference so that we can then maybe take on some of those issues and get some guidance from the Court, because I can't tell you how long it will take until I --

THE COURT: That's ok. And you know, what I can do, when you all -- this case needs to get moving along --

MR. ALFORD: Fast as you want to go.

THE COURT: -- for multiple reasons, but when it gets to the point -- do you disagree, Mr. Brewer, that after these last two depositions, you'll be -- and you would leave the summary judgment motion be to resolved,

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

and after that, go ahead and start putting things together.

MR. BREWER: Yeah. But for the -- except for the minor exception of the request Mr. Hoagland had just to be able to re-address some additional depositions if they need to be taken. But as it stands today, I mean, we were ready to be done with discovery and all depositions as of today. So, in that context, the answer to your question is yes. We think that's right. And to answer your question, Judge, I would think this is -- I think a shorter answer to Mr. Alford's response is I think this is an over a one-week case, no doubt.

THE COURT: Is what?

MR. BREWER: I think this case will take two terms, at least. I don't know it's going to take three terms.

THE COURT: I tell you what, I'll be very surprised if it does.

MR. BREWER: If it takes -- my anticipation, your Honor, having tried one of these public figure councilman cases, that it would take into a second week.

THE COURT: I'm just repeating myself, okay?

MR. BREWER: I understand.

THE COURT: I'm going to let you try your case, but --

MR. BREWER: I understand.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

THE COURT: But I'd just be really surprised if it does. Hang on for me one second, guys.

Let me ask you this. I'm looking -- I'm not scheduled down here 'til the end of June for sure. Okay? So I'm either going to have to send me here, or I can get -- see if I can get Court Administration to give me a special week assigned down here during one of my chambers weeks, one which will be on the 30th.

MR. BREWER: The 30th of?

THE COURT: April.

MR. BREWER: Okay.

THE COURT: I see a chambers week in March as well. That may be pushing you a little bit more than you need.

MR. BREWER: I think that's right, but April 30th, I don't foresee a problem with that.

THE COURT: And you're certainly not. I mean, it's certainly not -- and then, obviously, subsequent to them agreeing with me, and the clerk down here agreeing to have a jury trial. I mean, it's more than one person that'd have to say. If we look at April 30th as a tentative time frame for trial, let's kind of gear towards that. I'll check with Ms. Roseneau. And also -- let me tell you, Mr. Brewer, Mr. Brewer, this is lawyer talk. This ain't client's talk now. Okay? When

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

we're going to trial, we're going to trial.

MR. BREWER: Understand. Oh, yes, Your Honor. No, I understand. I understand.

BAILIFF: Your Honor? If I may. We've got a two-week possible trial, the stucco case.

THE COURT: On the 30th of April?

BAILIFF: Yes, sir. Well, I don't know it's the 30th, but they've cut it down to two dates, one in April and one in May.

THE COURT: Okay.

BAILIFF: So you need to keep that in mind, too. Judge Dixson's going to be --

THE COURT: Because that may very well do --

BAILIFF: Exactly. Right.

THE COURT: Okay.

MR. ALFORD: It'll settle.

THE COURT: What's that?

MR. ALFORD: I try a lot of those -- or I'm involved in a lot of those kind of cases, and 99.9 it's been settled.

THE COURT: Listen, I tell you, weren't you on the one we did the other day where we picked a jury and they settled over lunch time?

MR. ALFORD: No, sir, but they -- I mean, very rarely do they -- and when they do, though, they take

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

the whole time.

THE COURT: Okay. Let's see what we're looking at. April 30th, that's chambers. If I have chambers, typically, they're all -- we're all in chambers.

BAILIFF: Well, they want two weeks, a minimum of two weeks, either on the front or --

THE COURT: I see Judge Buckner.

BAILIFF: Yes, sir. Well, it's not on the schedule yet, because they haven't picked which of the two dates. They've got all of them. They have to get together.

THE COURT: Okay. That's all I have until the end of June, okay? And the schedule ain't come out, I don't think, for July. It may have. No. That remains to be seen. I'll check and we'll be in touch with you guys.

MR. BREWER: Okay.

THE COURT: Just keep that as a loose idea, April 30th.

MR. BREWER: Yes, your Honor.

THE COURT: All right. Anything further from the plaintiffs in this matter -- plaintiff?

MR. LINTON: No, your Honor.

THE COURT: From the defense?

MR. BREWER: Nothing from the defense, your Honor. Thank you.

THE COURT: All right. Thank you, gentlemen.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

Okay. Thank you guys.

MR. LINTON: Thank you, your Honor.

END PROCEEDING 2:59 P.M.

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

CERTIFICATE OF REPORTER

JANUARY 30, 2018 TRANSCRIPT OF HEARING

STATE OF SOUTH CAROLINA

COUNTY OF BEAUFORT

I, Wanda H. Rowe, Official Court Reporter for the State of South Carolina, do hereby certify that the foregoing January 30, 2018 Transcript of Hearing is a true and accurate record of the proceedings had on said dates, in the case of Kim Likins versus C.C. Hoagland, Beaufort County, Court of Common Pleas, Case Number 2015-CP-07-02937; that no exhibits were admitted; that I am of neither kin, counsel, nor interest to any party hereto.

This Certificate of Reporter contains my digital signature and is attached to the copy of this transcript requested by Hon. Barrett Brewer. Pursuant to SCACR 607, requests for copies of this or any transcript must be made to the court reporter. Unauthorized copying/emailing is prohibited.

Witness my signature August 7, 2018.

s/Wanda H. Rowe
Wanda H. Rowe, CVR-M
Official Court Reporter

ELECTRONICALLY FILED - 2020 Mar 30 4:00 PM - BEAUFORT - COMMON PLEAS - CASE#2015CP0702937

STATE OF SOUTH CAROLINA)
) IN THE COURT OF
COUNTY OF BEAUFORT) COMMON PLEAS

KIM LIKINS,)
Plaintiff,)
Vs.) CASE NO. 2015-CP-07-02937
C.C. "SKIP" HOAGLAND, et al)
Defendants.)

MARCH 9, 2020
BEAUFORT, SOUTH CAROLINA

HONORABLE R. LAWTON MCINTOSH, JUDGE

A P P E A R A N C E S:

BY: G. TRENHOLM WALKER, ESQUIRE
JOHN P. LINTON, JR, ESQUIRE
GREGORY M. ALFORD, ESQUIRE
Attorneys for the Plaintiff

BY: LEE C. WEATHERLY, ESQUIRE
Attorney for the Defendant PURE

BY: BARRETT R. BREWER, ESQUIRE
Attorney for the Defendant Hoagland

KATHERINE A. SPIRES
REGISTERED PROFESSIONAL REPORTER

INDEX

WITNESS	DIRECT	CROSS	REDIRECT	RECROSS
KIM LIKINS				
Mr. Walker	21		123	
Mr. Brewer		80		
DEPOSITION OF MARV LICH				
Mr. Linton	127			
MICHAEL BRIGGS				
Mr. Alford	146			
Mr. Brewer		167		
PETER BUONAIUTO				
Mr. Brewer	181			
Mr. Alford		197		
Ruling of the Court		212		
Certificate of Reporter		232		

E X H I B I T S

NO.	DESCRIPTION	ID	EX
C-1	Deposition		81
C-2	Deposition		113
C-3	Deposition		200
C-4	Affidavit/attachments		231
P-1	Email		30
P-2	Email		31
P-3	Email		33
P-4	Email		35
P-5	Email		37
P-6	Email		39
P-8	Email		71
P-10	Contract		47
P-11	Email	146	
P-13	Video		79
P-14	Email		52
P-15	Email		56
P-16	Email		57
P-17	Island Packet advertisement		59
P-18	Email		59
P-19	Email		63
P-21	Email	146	162
P-22	Email		66
P-23	Email	146	162.

P-36	Deposition of M. Lich			126
P-37	Deposition of S. Hoagland			126
P-105	Email			75
P-108	The Island Packet ad			75
P-108A	Photo of newspaper ad			75
D-1	Notice letter		83	83
D-2	Email		85	85
D-3	Attachment		85	85
D-4	Speech		87	87
D-5	Article		168	
D-6	Article		174	
D-7	Email		178	178
D-8	Speech		196	

THE COURT: All right. Gentlemen, wonders never cease to happen, I can say that pretty clearly on the record. I never thought in a million years that this case would be settled as I was told in chambers that the vast majority has been. But with that being said, I understand there is a settlement as to Ms. Likins's legal claims against Mr. Hoagland, not necessarily with Mr. Hoagland, but with the carrier; is that correct?

MR. WALKER: That's correct, Your Honor. Trenholm Walker for Kim Likins the Plaintiff. And with me is John Linton and Greg Alford and Ms. Likins is on the far end of counsel table.

There has been a resolution of a case that Ms. Likins brought against PURE Insurance Company, her claim verses the insurance company. And with that settlement, she no longer sees the need to proceed with a jury trial to collect the damages award and will not be proceeding on her legal claims. She will dismiss them probably, we haven't talked about it, but PURE is not demanding release. We'll probably dismiss them without prejudice understanding the consequences.

But the second part of this case which has been in the case the whole time is the claim for an injunction seeking to curb certain conduct in particular Mr. Hoagland from interfering with her employer and

contacting her employer and contacting her. And that is the case that we would like to proceed on with Your Honor and does not require a jury.

As to the settlement, Mr. Linton has been the one -- has been the one in contact with the insurance company and he and Mr. Weatherly can go over it.

THE COURT: Who's representing PURE, you are?

MR. WEATHERLY: Yes, Your Honor.

THE COURT: What is your name?

MR. WEATHERLY: Lee Weatherly.

THE COURT: Okay. Mr. Weatherly, good to see you this morning. All right. Mr. Linton, would you go over the terms of the settlement with PURE for me, please, sir?

MR. LINTON: Yes, Your Honor. The terms of the settlement that PURE is -- that is the settlement between PURE and Ms. Likins, not with Mr. Hoagland, and there's no release of Mr. Hoagland at all is payment of $400,000 from PURE to Ms. Likins within 30 days of a signed settlement agreement. It involves a release of PURE fully for any judgement that would have occurred in this case and the dismissal of a related case Ms. Likins filed against PURE and the Hoagland's.

THE COURT: Do you have that case number?

MR. LINTON: We do.

MR. WEATHERLY: I don't.

THE COURT: That's okay.

MR. WALKER: I can find it pretty quickly, Your Honor.

THE COURT: Okay.

MR. LINTON: The caption is *Kim Likins verses Privilege Underwriters Reciprocal Exchange and Skip and Kathy Hoagland.*

THE COURT: Okay. So upon the payment -- first, do you agree that is PURE's settlement with Ms. Likins?

MR. WEATHERLY: Yes.

THE COURT: And do you also agree that PURE is not requesting that Ms. Likins sign a release with them at all at this juncture?

MR. WEATHERLY: PURE is not requesting that they sign a release as it regards to the Hoagland's. They will sign a release for PURE and the underlying action will sign a release releasing PURE from any verdict or settlement or judgement or whatnot on behalf of the Hoagland's. That is simply going to be releasing PURE out of this case.

THE COURT: I misunderstood that.

MR. WEATHERLY: Nothing regards to the Hoaglands.

THE COURT: So, Mr. Linton, then just for clarity purposes because I need clarity as much as I can get it,

your settlement with PURE alleviates Ms. Likins's desire to go forward on her causes of action for invasion of privacy, defamation, intentional interference with contractual relations or intentional infliction of emotional stress against Mr. Hoagland?

MR. LINTON: Yes, Your Honor. She's decided not to proceed with those.

THE COURT: And she'll be dismissing those without prejudice, as I understood?

MR. LINTON: Yes, Your Honor.

THE COURT: All right. Mr. Brewer?

MR. BREWER: The one cause of action I didn't hear is -- I think there was also a cause of action for tortious interference with business relations.

THE COURT: I called it intentional interference. It's tortious interference, you're correct.

MR. BREWER: I'm sorry. I just didn't hear that one, so I just wanted to make sure everything except the injunctive action is being dismissed --

THE COURT: All legal causes of action are being dismissed without prejudice.

MR. BREWER: Thank you, Your Honor. That's all I wanted to clarify.

THE COURT: Okay.

MR. LINTON: Your Honor, I've got that case number.

THE COURT: Is that 2018-CP-07-01562?

MR. LINTON: Yes, Your Honor.

THE COURT: All right. Very good. Thank you. All right. So with that being said, Madam Clerk, we have dismissed the jury this week because the second case on the docket has settled; is that correct?

THE CLERK: Yes, sir.

THE COURT: Very good. Do you need to stay or do you want to go?

MR. WEATHERLY: I'd like to stay and watch a little bit. I drove all the way here, I might as well see some of the fireworks.

THE COURT: All right.

MR. WEATHERLY: I'll go over here and be out of the way.

THE COURT: So we're going to go forward on Ms. Likins's claim for injunctive relief against Mr. Hoagland.

For the record, Mr. Hoagland is not present and through Mr. Brewer has advised the Court that his intent was not to be present today; isn't that correct, Mr. Brewer?

MR. BREWER: That's correct, Your Honor.

THE COURT: Also, I've notified counsel in a conference call last week that we still had the contempt

matter that where I found Mr. Hoagland in contempt of my gag order that I issued early on in this case. I will note for the record, we'll do it later.

But in reading the local *The Island Packet* when I got here early this morning and having my cup of coffee, I noticed that Mr. Hoagland had been in communication with the paper again.

With that being said, do you want to call your first witness, please, or do you want to give an opening statement?

MR. WALKER: Your Honor, we would like to give a very short opening statement just to give you a preview of the direction we're going.

THE COURT: Okay, sir.

MR. WALKER: As you heard at the outset, we have represented Kim Likins since December of 2015. Kim's real job as -- is as executive director of the Hilton Head Boys and Girls Club where she's been coming on eight or nine years. A job she loves.

Back in 2015, she also was a town council member for the Town of Hilton Head. And in that capacity, all council members were to pass on a contract that was between the town and the Chamber of Commerce for the chamber to be the destination marketing organization for the town which you're familiar with from prior hearings.

Anyhow, it was contested by Mr. Hoagland who didn't believe that the contract was strong enough. It came up before council on November 17, 2015. Council voted to approve it. Now before that, Mr. Hoagland had started a campaign with Ms. Likins to try to get her to vote against it and it started back in July of '15, four months before when he sent her an email and said, I'd really like to talk to you and go over my thoughts on this contract. And, by the way, I know Stan Smith who was on the Board of the Boys and Girls Club and I'd like to talk about a donation.

Well, she got back to him and said, I'm not comfortable with that, you submit it in writing. He continued to go after her, but also Stan Smith to get her to meet with him. And when that didn't happen, he began his second campaign which is we're going to embarrass you and we're going to sue you if you don't go along with me. Then after the vote, he took out an ad in the newspaper to condemn everybody who voted in favor of this contract and to go on and on about his views.

After that, he began a deliberate plan to try to get her fired from her job. He called up the chair of her board of -- or the president of her board and said she's not fit to be around children, she needs to be terminated. He called up the head of the Lowcountry Boys

and Girls Club and said not only is she not fit to be around children, she's dangerous around children.

She then sent them -- or he sent them some information he had which was mocking Kim Likins about a financial investment that actually her mother had initiated without parish that collapsed to discredit her and did everything he could in his powder to get her fired. He admits that he knew that she was probably a good employee, he just wanted -- he felt he had in his words, a duty to get her fired.

And when we brought this case, the second prong of it was to stop any further communications with the employer and statements about her to his (verbatim) employer. We had a preliminary injunction that was issued by Judge Dukes back -- it's been over four years ago, December 2015. And that part of this case is still going on as we told you. But he has been relentless in his campaign, obviously, related to the chamber contract. Now to our knowledge, he has not contacted the Boys and Girls Club since that preliminary injunction. He's done a lot of other things in violation of other orders of this court.

But what we're asking is to convert essentially that preliminary injunction into a permanent injunction so Ms. Likins does not have to worry about her employer

being contacted and her being harassed and embarrassed directly. If he wants to go out in a public domain and say what he wants to say, he can do that in our estimation. It's just to prevent him from interfering with her job and her life.

Basically what would be, I guess, in the domestic world, the restraining order sometime specifically focused on those two things, Your Honor.

THE COURT: Okay. And that would be specifically contacting her employer about Ms. Likins or contacting Ms. Likins?

MR. WALKER: Yes. Yes.

THE COURT: Is Ms. Likins still on city council?

MR. WALKER: She is no longer on city council.

THE COURT: So she's only with the Boys and Girls Club?

MR. WALKER: That's right. She remains the executive director of the Boys and Girls Club. It's work that she loves. And although we're not going before the jury, had we done that, you would have heard how profoundly affected she was when these things were said about her. Because she has worked with charitable organizations for the last 20 years. And this is a job she loves.

THE COURT: All right. Thank you, sir.

All right. Mr. Brewer, I will be glad to hear from you.

MR. BREWER: Thank you, Your Honor. To the extent that the case that we're dealing with today is simply one of injunctive relief. The issue really becomes Mr. Hoagland's First Amendment right. It's still the standard we would believe the Court needs to look at today. Whether or not in ruling on injunctive relief, Mr. Hoagland's speech, conduct, and actions were protected by the First Amendment and whether or not Plaintiff can prove that he acted with actual constitutional malice.

And in trying to contact my witnesses to see if they can come forth today, and based on the witnesses I believe the Plaintiff will put up, we believe what the case will show is that Mr. Hoagland believed that he had a valid First Amendment right.

(Mr. Brewer's iPad keeps dinging)

I apologize, I will turn that off. I thought I muted it already.

But he had a valid First Amendment right to not only stand on the street corner and preach to the top of his lungs what his opinion of was of Ms. Likins as a public official, but if that involved calling her employer, the Boys and Girls Club, then he was protecting to do that,

too.

And what we think the Court will see in the story line is this --

THE COURT: Well, let me ask you a question, Mr. Brewer, if I may. Part of my rational earlier in finding that Ms. Likins was a public official with regard to the defamation proceedings was that a lot of what stemmed in Mr. Hoagland's actions were a lot of what per Mr. Hoagland's action stemmed from Ms. Likins's conduct as a member of the city council of Hilton Head?

MR. BREWER: Yes.

THE COURT: Not necessarily as her -- in her position as the Boys and Girls Club. But since we're looking at this juncture for the future, she's no longer on city council?

MR. BREWER: That's correct.

THE COURT: What is your position with regard to whether or not she's a public official or officer or person now so to speak as opposed to being a private individual for those standards that you've just referred to?

MR. BREWER: She's no longer a public official, Your Honor, and I do think the Court -- I think what the Court was suggesting is that previously because she was a public official, the umbrella of the First Amendment

covers there includes her job. I think on the record we would simply say that she is -- the testimony will show from the witnesses I think that will be brought up today, she's still a public figure on behalf of the Boys and Girls Club. The witnesses will testify that she is the public face of the Boys and Girls Club. And that to the extent -- I think some of the testimony the Court would hear today is that Mr. Hoagland was concerned about two or three things we made in the prior comments was that in the year leading up to that vote, Ms. Likins and the Boys and Girls Club had simultaneously gotten a lot of benefit from the Town of Hilton Head. They had received a chunk of land that was bought for $200,000 for their behalf for -- that was then leased back to the Boys and Girls Club for a dollar for 50 years, that led up to the contract. Mr. Hoagland believed that the town was interested in having the chamber be its DMO and pushing that contract through, so that he saw a quid pro quo between what Ms. Likins and the Boys and Girls Club was getting from the town verses what the town kind of pushed through in having Ms. Likins read in the contract.

And so Mr. Hoagland felt that he was also pursuing Jeff Moss who was a superintendent of the schools, Beaufort County superintendent here, and literally during the same timeframe that he was making the statements

Mr. Walker was talking about, Mr. Hoagland had been investigating and filing ethic's complaints about Jeff Moss who had basically violated his public role by creating a job for his wife. It was a big uproar around here. Mr. Hoagland filed an ethics complaint, Jeff Moss got fired, and it was kind of public knowledge around here that Mr. Hoagland did good work and Jeff Moss was unfit for his position to leave boys and girls. That was simultaneously the case when Ms. Likins and the contract was coming up and Mr. Hoagland felt, just like I held Jeff Moss to a higher standard, I'm going to hold Kim Likins to a higher standard.

To go back to the Court's initial question about moving forward, I think that Mr. Hoagland's only First Amendment interest is in protecting his right to discuss the things he previously discussed. I don't think he has an interest right now in continuing to probe into Ms. Likins's current relationship with the Boys and Girls Club or their -- her current positions there. But I do think he would like to preserve his First Amendment rights to discuss the things that he previously discussed when they were matters of public concern, they were intertwined with the public service, and we still think the Court would be subject to the First Amendment standard in rendering its ruling today.

THE COURT: And I don't know that it makes a huge difference in this, you know, where we are now, but what is your position as to whether or not Ms. Likins would be a public figure at the Boys and Girls Club since she's no longer with the City?

MR. WALKER: We do not think that she's a public figure because she's with the Boys and Girls Club. But I think we're kind of off and going sideways a little bit here.

THE COURT: I think we could be doing that, too.

MR. WALKER: And it's really not about the First Amendment, it's about interfering with her job and whether -- and it doesn't have to be with -- we aren't talking about the First Amendment. He can go out on the street corner still and do whatever he wants to do and we're trying to give her peace of mind at her job. And we're going to show the conduct that gives the Court good reason in our estimation to protect her and to extend this preliminary injunction to a permanent injunction and he can still send his emails from his desk in Argentina and do whatever he's doing harassing people.

But we just want to leave -- have the Court rule that he's to leave her alone and her employer alone and that's what we want in the contempt citation and that's what we want in the injunction.

THE COURT: And the only -- and I'm not certainly not ruling this, but seems to me just because what I do, I mean, we certainly have to be thicker skinned with people commenting and having --

MR. WALKER: Exactly.

THE COURT: -- communications about what we do and, you know, basically second guessing what they think was right or not right and according to what we rule.

But it seems to me and this was not looking it up without having any -- you know, even in an injunction or restraining order type situation, there would be lesser basis to grant that if she is in fact a public figure because she has to be willing to accept some of that. That's part of what those jobs entail.

And so, keep that in mind, that's kind of where I'm thinking along the ways. And whether I'm right or wrong, you know, it doesn't hurt me for you to tell me I'm wrong because I'm told every day that, and so it doesn't bother me.

Are you ready to proceed?

MR. WALKER: Yes, sir.

THE COURT: Okay. Call your first witness.

MR. WALKER: We call Kim Likins. Can we hold on one minute --

THE COURT: Do you need a break?

MR. WALKER: Yes. We need to get our exhibits ready.

THE COURT: All right. Just send word back when y'all are ready to go.

MR. WALKER: Yes, sir. Thank you, Your Honor.

(There was a short break taken)

THE COURT: So have y'all stipulated to admissibility of certain documents and, if so, you want to put those on the record or not?

MR. WALKER: Your Honor, there are only a few that were contested, but we'll go through and just introduce them. Because I think we're going to skip some.

THE COURT: Okay.

MR. WALKER: And I don't think it will be too hard.

THE COURT: Sounds good.

MR. WALKER: And one last thing, Your Honor. We did get the exhibit notebooks -- we have one for the witness and I have one for the court reporter and I have one for you.

THE COURT: I would love one. Thank you.

MR. WALKER: Can we hit the reset button and we call Ms. Likins --

THE COURT: Yeah. Go ahead and call Ms. Likins and let's swear her in. Did she get sworn in last time?

THE CLERK: No, sir. Not yet.

KIM LIKINS,

being first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION BY MR. WALKER:

Q Kim, good morning.

A Good morning.

Q You've been in the courtroom, you also are the principal participant in this case. You understand we've narrowed the case to this injunctive question, so when I'm asking you questions, I'm going to just hit matters that are related to the injunction. But I want to give the Court a little bit of background on you.

So where do you live?

A Hilton Head Island.

Q Are you married?

A Yes, I am.

Q Who's your husband?

A Steve Likins.

Q Do you have children?

A I have two boys, Alex and Ben.

Q And where are they?

A Ben is a second year medical student at MUSC and Alex is a sophomore at the University of South Carolina.

Q Do you have a job?

A I do.

Q What is your job?
A My full time job is the director of the Boys and Girls Club on Hilton Head Island.
Q How long have you been the director of the Boys and Girls Club on Hilton Head Island?
A It will be nine years this coming October.
Q What does the Boys and Girls Club of Hilton Head do? Just generally if you could give the judge a thumbnail sketch.
A Sure. We provide youth development services for children after-school until seven in the evening and for ten and a half hours a day during the summer. The children that we serve are the most vulnerable children on the island. Over 65 percent of them fall at the poverty level. Forty-five percent of their family income falls at the lowest level of poverty.

Hilton Head is a service community and so these families are really the backbone of our service industry. They're the ones who are making the beds and washing the dishes. And without an organization like ours, these children would never have the academic support, the mentorship, and really the enrichment opportunities that most other children have. So we really fill that gap for their lives.
Q Is it just after-school recreation or is it broader

than that?

A Oh, much broader than that. We really service the whole child. Academics are extremely important. We have a large number of our children who have English as a second language, so we have a special certified reading program. We have math tutoring. We have homework help. We have an amazing technology center that teaches them coding. They work with drones and do photography. We also have incredible and enrichment opportunities in art and drama. And, of course, we do traditional sports, too. We would certainly not leave that out with basketball and flag football and soccer and those types of activities as well.

Q Do you find your job rewarding?

A Extremely rewarding.

Q Is the Boys and Girls Club of Hilton Head funded by the government? Is it a government agency or entity?

A No. We receive no governmental funding at all. We raise our budget every year.

Q Through charitable donations?

A Correct. And grant writing.

Q In this case, when we get into your testimony a little more, they'll be some reference to the Boys and Girls Club of the Lowcountry. Would you tell His Honor about the relationship between the two entities, Kim?

A Sure. We are under an umbrella of the Boys and Girls Club of the Lowcountry and we all operate independently, but that's sort of our umbrella company where the 501(c)(3) is located.

The Boys and Girls Club of the Lowcountry actually started here in Beaufort and then the second club was the Hilton Head club and then the Bluffton club and now there's a club in Jasper as well.

Q We've talked about the Boys and Girls Club, now I want to shift to town council.

A Sure.

Q Were you a town council member --

A I was.

Q -- for the Town of Hilton Head Island?

A Yes, for eight years.

Q When did you start and when was your last term up?

A I was elected in December of 2010 and finished my service in December of 2018.

Q Is that in anyway or was that in anyway a full time job?

A No.

Q About how many hours a month would you say you spent?

A Probably about 25 hours a month.

Q Did it interfere in anyway with your work for the

Boys and Girls Club?

A No.

Q When did you first encounter the Defendant Skip Hoagland?

A My first recollection of Mr. Hoagland was sometime in early probably February of 2015. He might of randomly spoken at council meetings prior to that, but I don't really remember.

In 2015 is when he pretty much routinely started coming and speaking at council members -- at meetings. I'm sorry.

Q Do you understand that he has or had a business that he operated in Hilton Head?

A Yes. It was my understanding that he had a media marketing business. I know they have a website, I believe it's HiltonHead.com. And then they also produced a magazine that was very poplar on the Island called *Island Events* so that when tourists would come to town they would have the opportunity to find out all the things that they could do on the island.

Q And by the way, is Mr. Hoagland a resident of the Town of Hilton Head Island?

A No, sir. He's not a resident of Hilton Head.

Q Tell the Court on what subject Mr. Hoagland addressed council in the comments period?

A Mr. Hoagland had an issue with the town's partnership with the Chamber of Commerce in association with us using them as our DMO.
Q What is it -- for the record, what is a "DMO"?
A It's our designating marketing organization.
Q Does that relate to the accommodations tax that are collected within the town?
A It does. The accommodations tax are collected and then there's state law that defines how we are supposed to give those back out. One component of that is that we were to choose a designated marketing organization that would market Hilton Head Island and bring more tourists back. And the chamber had always been the designated marketing organization for Hilton Head. As a matter of fact, the state code actually talks about --
Q I don't want you to go into the state code.
A I'm sorry. Okay.
Q But do you know of any year before you came on council or after you came on council when the DMO was not the Chamber of Commerce for Hilton Head --
A No. It was always for Hilton Head.
Q Now, up until 2015, had there been a formal arrangement or a formal contract between the chamber and the Town of Hilton Head Island?
A No. It was not a formal contract about them being

our DMO.

Q Even though there was not a formal contract, was there a committee that reviewed the work being proposed and the money that was being spent on marketing?

A Absolutely. That's also a requirement and it's called our ATAX committee. And, again, it is made up of citizens in the community primarily that have experience in lodging and hospitality. And so they are the ones that initially vet all of the requests for that funding.

So they look at the DMO's marketing plan and budget and review it along with other grants that come in and then they make the recommendation to the town council on whether we should accept it or not.

Q In the Town of Hilton Head were the hotelias whose guests were actually paying the taxes part of that committee or were there representatives from hotels on that committee?

A Absolutely. And, again, that's required to have lodging and hospitality people on that committee. They're kind of like the subject matter experts.

Q Within the council of the Town of Hilton Head which committee was charged with working on the agreement between the town and the chamber to formalize it?

A The finance and administrative committee.

Q Were you a member of that committee?

A No, I was not.
Q Now I want to move to communications directly by Mr. Hoagland with you.
A Okay.
Q And I'm going to ask you to go to Exhibit 1, if you would. There's a notebook in front of you. Do you have that in front of you?
A I got it.
Q Do you remember any earlier direct emails to you on the spot from Mr. Hoagland on the specific subject of the chamber contract?
A No. I believe this was the first email that I received from him.
Q Would you read this email aloud into the record that we've got before you -- first, what is the day?
A July 12, 2015.
Q What is the subject line?
A "Meeting or phone call."
Q And proceed to read the text of the email, please.
A "Kim would you please give me or Mike a 20 minute meeting or phone call. I'd like to share the latest facts with you on our chamber/cvb. Thx.

Also what can I do to help the Boys and Girls Club? Stan Smith is a long time friend of mine and know" -- I think he means, and I know him very well.

Q Now, was anything about this email concerning to you?

A Absolutely. It was the very first time in my five years of being on council that anyone at all had spoken to me about wanting to get together. And at the same time, mentioned my job and the fact that they would be willing to support my organization. It just seemed like, you know, he was wanting to influence my vote.

And also I'd never had anyone point out that they were very good friends with probably my most famous and influential board member as well.

Q Is Stan Smith a mentor of yours?

A Absolutely.

Q And --

A Stan --

Q And before we get into this, is this Stan Smith the former tennis grade who won Wimbleton?

A It is. And the Stan Smith who still has the number one Adidas tennis shoe in the whole world.

Q Has he been a supporter of the Boys and Girls Club of Hilton Head Island?

A Stan has been our longest board member. He led our capital campaign to build our facility. He and his wife Margie chair every year our Gallo which is our largest fundraiser.

Q Before you responded, did you receive another email from Mr. Hoagland?
A I did.
Q If you'd please go to Plaintiff's Exhibit 2.
MR. WALKER: By the way, before we get to Exhibit 2, I forgot, we would move Exhibit 1 into evidence.
THE COURT: Any objection?
MR. BREWER: None.
THE COURT: Admitted.
(WHEREUPON, Plaintiff's Exhibit 1 was entered)
Q Now, let's go to Exhibit 2. Is that another email?
A Yes, it is.
Q And what is the date of that email?
A This is now July 14, 2015.
Q Does Mr. Hoagland copy other people with the email to you and Bill Harkins?
A He does.
Q Who are some of these other people that he's copied?
A Some of them are council members. Definitely the media, Sarah Borton was publisher of the newspaper. Marc Frey publisher of Hilton Head Monthly. And I guess some of the individuals I don't know who they are.
Q I would like to direct your attention to the second paragraph because I'm going to limit our public review

here -- we'll admit it into evidence, but for purposes of the record, does he refer to you in the second paragraph?

A Yes, he does.

Q If you would please read the first two sentences there. Two or three sentences.

A "Bill/Kim you and other town council members have a fiduciary responsible to follow facts not opinions. You and other council members have been furnished all by professionals and been offered to answer any questions you have with facts."

Q All right.

MR. WALKER: Your Honor, we would move Plaintiff's Exhibit 2 into evidence.

MR. BREWER: No objection, Your Honor.

THE COURT: Admitted.

(WHEREUPON, Plaintiff's Exhibit Number 2 was entered)

Q Did you get back to Mr. Hoagland by email?

A I did.

Q The email we just looked at was sent on Tuesday, July 14, 11:54 a.m. Would you turn to Plaintiff's Exhibit 3, is that your email back to Skip Hoagland at the bottom half of that page?

A Yes, it's my email back.

Q And what day did you send that?
A July 14, 2015 at -- looks like 6:46 p.m.
Q What did you say to Mr. Hoagland if you'd please publish that?
A Would you like me to read it?
Q Yes, please.
A "Dear Mr. Hoagland, thank you for your calls and emails. I apologize for not responding sooner. With respect to the matter regarding the chamber/vcb, if you have material that you believe is important for town council to consider, I would ask that you please present them in writing to the full council so that we will all have the benefit of the information.

Since there seems to be differences of opinions surrounding the town and the chamber/VCB's relationship, I'm not comfortable meeting privately with anyone regarding this matter lest it be perceived a lack of transparency. I hope you can appreciate my position regarding this issue and know that I am always willing and interested in hearing from the citizens of Hilton Head Island.

I think it is great that you want to help the Boys and Girls Club. Stan is a huge supporter and longtime board member. I am sure he would love to have the opportunity to discuss with you the needs of the

organization and how you can best be of assistance. Thank you, Kim."

Q Why did you direct him to Stan Smith with respect to any interest in the Boys and Girls Club?

A Because I absolutely did not want anything to cross the lines between my public work and my private job. And, so, if he was making any type of suggestion that he wanted to provide something just so that I would talk to him, I wanted it to be clear that I wouldn't do that.

MR. WALKER: Plaintiff moves Exhibit 3 into evidence.

MR. BREWER: No objection, Judge.

THE COURT: Admitted.

(WHEREUPON, Plaintiff's Exhibit Number 3 was entered)

Q And by the way -- well, I'll come back to that later. Now, did that seem to put an end to things, Kim?

A No, sir.

Q Let's go to Plaintiff's Exhibit 4 which is an email from Mr. Hoagland about three hours later. Is that in front of you?

A Yes, sir.

Q Are you familiar with that email?

A Seen it before.

Q Who was it directed to?

A To me.
Q Is it copied to other persons?
A Yes. Again, it's copied to other council members.
Q Does he press his case in this email for you speaking to him directly?
A He does.
Q Would you please read the first paragraph of that email?
A "Kim, all other board members except Bill Harkins have taken my calls and just ask you hear me out for ten minutes. You hit the nail on the head when you said 'differences of opinion' and this is the problem opinions not facts. What we need is a vote by council on facts and I have provided all facts when the chamber has presented none. I ask for a vote and proper representation based on facts not Skip Hoagland or Bill Miles propaganda. Can I call you tomorrow as I am at my offices in Argentina and could not meet anyway. I have again been opposite of Bill Miles and spent thousands in providing facts not thousands trying to hide facts."
Q Did this follow-up request change your mind about speaking to him directly?
A Not at all.
MR. WALKER: Plaintiff moves Plaintiff's Exhibit 4 into evidence.

MR. BREWER: No objection, Your Honor.

THE COURT: Admitted.

(WHEREUPON, Plaintiff's Exhibit Number 4 was entered)

Q Now, I'm coming back to the same question, did that end his efforts to try to get you to meet with him?

A No, sir.

Q Let's go to Plaintiff's Exhibit 5. It's a short email.

Is that an email from Mr. Hoagland?

A Yes, sir. It's an email from Mr. Hoagland.

Q When was it sent?

A August 10th.

Q Who is it directed to?

A This time it's sent to me and to my board member Stan Smith.

Q And what is the subject line?

A "Courtesy of a phone call."

Q Would you please read this email out loud?

A Yes. "Stan can you get Kim Likins to take my call to discuss her vote on what's right concerning the Hilton Head chamber and all its proven corruption, violations and abuse based on facts and truth. I want to know her position on doing an audit on this chamber to confirm how our tax dollars have been used for the

last three to five years."

Q Was there anything about this email that was concerning to you?

A Absolutely. I was horrified that he had sent an email to my board member and that he was trying to influence my board member to get me to talk to him.

Q Does this email at all refer to any interest in making a donation?

A No.

Q To your knowledge, has Mr. Hoagland ever to your knowledge come by the Boys and Girls Club to learn more about it?

A Never.

Q To your knowledge, based on your review of the records, has he ever given a penny to the Boys and Girls Club?

A Not on our records.

Q Now, after this email to Stan Smith, did you agree to meet with Mr. Hoagland?

A No, sir.

Q Once more, did that end the emails and communications with you --

MR. WALKER: And before I get there and before I forget, Plaintiff would move 5 into evidence.

MR. BREWER: No objection, Your Honor.

THE COURT: Admitted.

(WHEREUPON, Plaintiff's Exhibit Number 5 was entered)

Q Let's go to Plaintiff's Exhibit 6. All right. Now, let's go to the Plaintiff's Exhibit 6 which is an email dated August 26, 2015. Who is that email from?

A It's from Mr. Hoagland.

Q Is this, to your knowledge, a true and accurate copy of that email?

A Yes, sir.

Q And there seem to be a few more people that are copied. First, are there more than just you as the addressees of the email?

A Yes.

Q The "To" line. And are those other council members?

A They're other council members and a gentleman named John Buchanan.

Q And who is this guy named John Buchanan?

A John Buchanan is a gentleman that Mr. Hoagland hired to do most of his writing when he put ads in the newspaper and things like that. He was a journalist, I believe, from somewhere in Florida. And I think he considered himself a subject matter expert on DMO's.

Q Now, I'm going to ask you to read certain portions

of this.
A Okay.
Q First, if you would read the first three sentences down through the middle of the fourth line, please.
A "I will speak at all meetings listed below!!! I will direct my speeches to mainly Kim Likins of the Boys and Girls Club and Bill Harkins who refuse to accept facts our chamber must be audited. They refuse to talk or take calls on this and openly support the crook Bill Miles who has abused this island long enough."
Q All right. Let's pause there. In previous communications or other communications by persons with you about council issues, had others ever before referred to the Boys and Girls Club as opposed to just you Kim Likins council member?
A No. Not at all. No one has ever brought my employment into public issues.
Q Now, let's skip a couple of sentences and go down to where he starts with "Kim Likins." Do you see that, Kim?
A I do.
Q And if you would start there and go to the end of the paragraph.
A "Kim Likins should be ashamed of herself as should others that refuse to do a Palm Beach style audit on

this chamber to see once and for all if the audit will have the same results as Palm Beach where the Bill Miles and Susan Thomas type went to prison for 15 yrs for embezzlement! Who is right and who do you trust more Bill Miles or Skip Hoagland? An independent forensic audit will prove all. Those who do not support an audit going back to prove violations are as guilty as those who have committed any crimes by trying to allow and endorse escape from justice."

MR. WALKER: Your Honor, Plaintiff moves Exhibit 6 into evidence.

MR. BREWER: No objections, Your Honor.

THE COURT: Admitted.

(WHEREUPON, Plaintiff's Exhibit Number 6 was entered)

Q I'm going to skip the question about the emails in there. I'm going to go to the next email. Would you please go to Plaintiff's Exhibit 8.

Were you copied on that email?

THE COURT: This is Number 8?

MR. WALKER: Yes, sir. Plaintiff's Exhibit 8.

A Yes, sir. I was copied along with Mr. Harkins and the press.

Q And, again, what's the date of this email?

A September 16th.

Q You're referenced a couple of times in this email. If you'd go down to the third line there's a sentence that starts "A call," would you please read that?

A "A call to Kim Likins at Boys and Girls Club and Bill Harkins would be appreciated."

Q Then if we go down to the last second paragraph where he seems to be addressing you directly. Would you read that?

A (No response)

Q "Bill/Kim."

A I'm sorry -- oh, okay. The very end of the paragraph?

Q Yes.

A Sure. Gotcha. "Bill/Kim tell us all including the press if you handed Skip Hoagland 3 million to invest for you and 3 years later called Skip to see the books and how all was invested because you felt the return needed to be verified and Skip said no what would you do? Can you answer this to the people who voted you in office or are we expected you feel you can be like Bill Miles and refuse to answer all of us. Perhaps you would prefer I put this letter in a full page ad. Kim you need to set a better example for the Boys and Girls Club or perhaps you need to be replaced from that job as well."

Q Before this email, even though Mr. Hoagland was referring to the Boys and Girls Club, had he ever suggested that you needed to be replaced in your private job for any position that you took on council?

A Never. This was the first time. I mean, obviously, his rhetoric was escalating and this was the first time that he suggested that I should lose my job because I'm not listening to him.

Q Does he refer to other public exposure?

A As far as being put in a newspaper ad, yes, absolutely.

MR. WALKER: Your Honor, Plaintiff moves Exhibits 8 into evidence.

MR. BREWER: No objection, Your Honor.

THE COURT: Admitted.

(WHEREUPON, Plaintiff's Exhibit Number 8 was entered)

MR. WALKER: And for those of you who want to follow on our screen, we actually have it up there, too.

Q Okay. We're coming up to the contract and before we get to it, I want to talk a little bit about what was going on outside the emails. We looked at email number, I think it was Number 7 -- actually, it was -- yeah, 7, that had the council meetings -- no, 6, that had the council meetings on the second page.

Did Mr. Hoagland come to the council meetings to speak that fall?

A Yes, sir, he did.

Q And I want to talk about two in particular. And that would be the council meetings that were in October. And let me check the dates on that. And I'm going to refer to the October 6th council meeting.

Did he come and address council that meeting?

A Yes, he did.

Q Was his subject the same subject?

A It was.

Q And that was what?

A It was the things that he wanted to be put in the contract for the chamber.

Q At that meeting, did he say anything about the individual council members?

A He did. He actually said that he knew that we were all really good people. And -- so he made that statement.

Q And then I'm going to jump ahead to the meeting on November 3rd which would have been the council meeting before the contract was considered.

Did he appear at that council meeting as well, November 3, 2015?

A He did. And spoke again about the contract.

Q At this meeting, did he also address or say anything about the individual council members including you?

A He did. He reemphasized that we were all good people and he also stated that he knew that we had very high standards. And that we would do the right thing.

Q Going back to the contract itself, were you provided a draft of it before it was presented to council for vote?

A Yes, sir.

Q Was it also presented to the public before the meeting?

A It was. It was presented two weeks before the vote of the contract.

Q Which way did you decide in the end to vote on the contract?

A I voted for the contract.

MR. WALKER: Your Honor, at this time we're going to put up -- we'd ask the witness to go to Plaintiff's Exhibit 10. If I might just address counsel, Mr. Brewer, for a second.

I understand from Mr. Linton that you may have had an objection to the draft as opposed to the executed. We substitute the executed if you want.

MR. BREWER: For today's purposes, I think I said I

had a copy of the executed one and I was happy to give that to y'all. I think I have it now. If you'd like to use it. But for today's purposes --

MR. WALKER: Are you okay with it?

MR. BREWER: I'm okay with it if you'd like to use the executed copy.

MR. WALKER: All right.

Q Well, let's go from the draft since the draft was viewed beforehand.

THE COURT: In this notebook it appears that it's been executed.

MR. WALKER: Oh, has that been substituted? Okay.

Q All right. So we have substituted an exhibit which is the executed contract which is -- is it verbatim the same as the draft to your knowledge, Kim?

A It looks exactly like the draft.

Q And while I don't want to -- I'm not going to have you read it, I do want to spend a minute or two going through this. Because of what's at issue in this case because I would like you to tell the Judge the provisions in the contract that were important to your decision, if you don't mind.

A Sure. Absolutely. The contract created greater accountability. I believe that we had accountability already because of the fact that every year the chamber

had to provide a detailed marketing plan along with the budget. And then at the end of the year they had to come back and show how those funds were spent. And really what the outcomes were. The return on the investment.

This really solidified that in a greater way because rather than them just coming and telling us here is the great things that you got for your money, we were actually able to create metrics, very specific metrics that we wanted to look at and have them be measured on within the contract. So I thought that that was a good thing.

There is also an audit requirement in here. The chamber was having an audit done, an annual audit. But that again solidifies that there was an audit in here.

Q Would that be Section 2.1 that you're referring to on the first page?

A Yes. And this went further in the sense that it allowed the town to participate in the selection of that auditor. And it also provided the ability for town members or town staff to be able to go into the chamber and literally look at the detail of the books if they so chose a couple of times a year.

Q Did the contract under audit specify such things as it had to be done according to generally accepted

accounting principles and other universally accepted standards?

A Absolutely. All of that was in there.

Q And if you go to 2.7 on page 3, please. Is that the inspection right that you were referring to?

A Yes. That's the inspection rights where our town manager or someone from the finance and administrative committee could go in and ask to look at the books.

Q Number 3 is performance standards, is that where the metrics that you were talking about, the performance standards were contained?

A Correct. Things like the chamber would maintain their four star accreditation and that they would still maintain and follow all the criteria of the DMAI which is sort of the organization that establishes the highest standards for a designated marketing organization.

Q Now, if we go down to the bottom of page 3 and the top of page 4, DMO industry metrics and we go to the top of page 4, are those the various objective quantitative numbers that you were talking about to measure performance?

A These are the ones that we as a council chose to specifically put in the contract that they would be measured.

Q Had the chamber received any national recognition

for its -- or let me change that. Had the Town of Hilton Head received any national recognition during the time that the chamber was the DMO?

A Oh, tons of national recognition and continues to receive it to this day. I believe that they've received the number one beach or island in the country for the last four years.

Q Is Hilton Head alone in using of costal towns that collect ATAX, is Hilton Head alone in using its chamber as the DMO or CVB as the DMO?

A No. I know that Myrtle Beach does as well and there could be certainly other costal communities that use a chamber as their DMO.

Q Kim, does town council take and do a video of its meetings?

A Yes, we do.

MR. WALKER: Your Honor, before I get to that, I would like to admit Exhibit 10 into evidence.

THE COURT: Any objection?

MR. BREWER: No objection, Your Honor.

THE COURT: All right. Admitted.

(WHEREUPON, Plaintiff's Exhibit Number 10 was entered)

Q Does council do videos?

A We do.

Q Because we're going to be looking at later emails and those emails in part talk about what was said that night. We're going to, with the Court's permission, play the three or four minutes of your comments that night.

Did you -- first of all, let me back up just a tiny bit. Did persons come and speak at that council meeting on public comment?

A Yes, they did.

Q Did they speak about the proposed contract that council was going to vote on?

A They did.

Q How did it break down pro and con, basically?

A There was probably maybe 25 people that were there, maybe a little bit more and it was almost 50/50 pro and con for the contract and against the contract.

Q And had you been giving this thought even before the council meeting as to what you might do?

A Absolutely. I also received a lot of emails, you know, many constituents don't necessarily come to the meeting, but they will send us emails about their comments. So I had taken all of those into consideration as well as listened to my counterparts from the finance administrative committee who had worked so hard with the town manager to create the contract.

Q All right. Is the video to your knowledge a true and accurate rendition of what went on that night with your comments?

A Yes, sir, it is.

MR. WALKER: So if we would, it's Exhibit 13. Yeah 11/17 and it's four minutes.

(WHEREUPON, the video was being played)

Q In your remarks you mentioned that you had prepared your remarks, would you tell the Court why you did that and how that came about?

A Sure. I don't often prepare written comments, but this was a time that I had very specific things that I wanted to mention associated with the DMAI and other components, so I wrote them down. They actually came to be because once a month we have -- each council member has a breakfast or a lunch with our town manager Steve Riley just so that we can talk about issues, talk about concerns, get any additional information that we might like to have. Bounce ideas off of him. It works very much like at the Boys and Girls Club where my board members will come in and speak to me. Because Steve is overall the operations of the town. He is really the executive branch, so to speak.

And so Steve and I had breakfast the day before the meeting. I typically carry in my notepad and I had left

it in my car, so he had his iPad that he keeps with him. When we started talking about the contract, I told him that there were some very specific points that I wanted to make. Asked him if he would jot them down as I talked through them with him and shoot them back to me. And he said, yes. And I had asked for some additional information as well.

So he typed them. Then I guess it was either the next morning or later that day he sent them to me in an email. I then took those comments and created what I used and referenced that evening as my written comments to share with the community the reasons why I was supporting the contract.

Q Now, to this day are you still convinced that you voted the right way?

A Absolutely. It's now been four and a half years and the contract is up for renewal. It's my understanding that the F&A committee just met again and it's endorsing the support of that. And if you look at the last five years, the chamber has not only met every metrics in here, but they've exceeded every metrics in here. And it has continued to be an excellent partnership for the town.

As a matter of fact, I think there are some citizens that would feel that we probably even have more

tourists than we can handle the marketing has been done so well.

Q After the meeting, did it take long for you to receive an email from Mr. Hoagland?

A No.

Q If you would, please, go to Plaintiff's Exhibit 14.

Do you recognize that email?

A Yes, sir, I do.

Q And would you give us the date and the time this email was sent?

A So it was Wednesday, November 18th at 1:18 a.m.

Q So is that within about six or eight hours of the council meeting?

A Yes, sir.

Q And who is that email to?

A It is sent to Mayor Bennett, Mr. Lennox, basically the town council.

Q Is it copied to others?

A Yes. There's several -- well, the newspaper again as always and then this time several county council members as well.

Q Would zmurdock@islandpacket be the newspaper?

A Yes. As well as David Lauderdale. He worked for the paper and then A. Holland works for WSAV news.

Q And if you would, please, go over the first -- or

please read the first two or three sentences.

A "Lee/Marc/David thanks for at least listening. John McCann for his comments he made up his mind last night and Kim Likins for her prepared speech when she lied and said she was taking notes the entire time should both be removed from office for there total disrespect to the public hearing and draft contract. No doubt they were both corrupted or just plain incompetent."

Q Now, did you say that you were taking notes the entire time?

A I never referenced at all that I was taking notes.

MR. WALKER: Plaintiff moves Exhibit 14 into evidence.

MR. BREWER: No objection.

THE COURT: Admitted.

(WHEREUPON, Plaintiff's Exhibit Number 14 was entered)

Q Now, let's move to the next communication and that's Plaintiff's Exhibit 15.

Do you have that before you?

A I do.

Q Who sent that email?

A That was also from Mr. Hoagland to myself and John McCann. And, again, copied some county council votes

and a couple of council members.
Q What is the subject line?
A "Violated public trust, due process and lied."
Q Let's go over the first paragraph there if you'd read that.
A "You both lied and are not fit to serve. I will look forward to speaking directly to both of you soon at public comment. Also you will be in my full page ads to publicly disgrace you both to this island. Kim you are not fit to serve the boys and girls well. You fully know what you did!!!"
Q Had anybody ever accused you of not being fit to serve boys and girls before this?
A Never. Never.
Q I'm going to skip the middle paragraphs and ask you if you go down to that one sentence at the bottom and if you would publish that, too.
A "I also think you will all be held liable when this all ends up in the courts and the audit is forced."
Q Backing up a second. Did his comment that you were not fit to serve boys and girls as well have any affect on you?
A Absolutely. You know, again, he's continuing to take something that I did in the public realm which was simply vote my conscience vote the way that I believed

that my constituents would have wanted me to vote and now threatening me in my private job simply because my vote isn't -- wasn't a vote that he agreed with.

Q Now, let's turn to the second page of this email, the top paragraph on the second page because we begin to pick up a newish allegation, okay.

Do you have the second page in front of you?

A I do.

Q Would you please read the top paragraph?

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

Q Tell His Honor who Charlie Clark is?

A So Charlie Clark is a woman. She goes by Charlie. And she is, I believe, the director of communications for the chamber. She's not on the DMO, the designated marketing organization side. Arianna Parnese is the senior vice president that is over that and who we work

with. Charlie --

Q Do you know Ms. Clark?

A I do know Ms. Clark. Charlie and her children and my children are similar in age. They grew up going to school together. They all went to school at Hilton Head Christian Academy. And her younger son played on the same tennis team as my boys did.

Q Did you have any conversations at all with Charlie Clark about the chamber contract?

A None at all. I had no conversations about the chamber contract with anyone from the chamber.

Q Did you -- did she prepare remarks for you?

A No. She did not prepare my remarks.

MR. WALKER: Plaintiff moves Exhibit 15 into evidence.

MR. BREWER: I have no objection to that. Can I ask the Court is it 14?

THE COURT: It's 15, page 2.

MR. BREWER: And also didn't you talk to her about 14?

THE COURT: 14 was admitted.

MR. WALKER: We would move 14 into evidence if we had not previously.

THE COURT: It was admitted on my notes.

MR. BREWER: And it is admitted, I didn't have that

down. I'm sorry. So, yes, 15 admitted. No objection.

THE COURT: All right. Admitted.

(WHEREUPON, Plaintiff's Exhibit Number 15 was entered)

Q Now, let's go on. Almost a week after that meeting to Monday, November 23, 2015, Plaintiff's Exhibit 16.

Is this another email that you were copied on?

A Yes.

Q And what was the time and date -- date and time of that?

A Monday, November 23, 1:06 p.m. in the afternoon.

MR. WALKER: One minute, Your Honor, because I am looking for one thing in this email.

Q And that's in the middle of the first page, Kim. Does he refer to you specifically about halfway down in his stream of sentences?

A Yes, he does. Would you like me to read that?

Q Yes, please.

A Okay. "Did Kim Likins lie when she said took notes and listened to everyone then proceeded to read a speech that could have been written by her good friend Charlie Clark chambers spokeswoman? I say yes! Is she fit to run and Boys and Girls Club."

And I think he meant a Boys and Girls Club or the Boys and Girls Club.

Q Did that continue any concerns?
A Absolutely. You know, he continues to suggest that I lied which I clearly didn't lie. There's nothing in the video that says that I took notes. I guess he just misunderstood when I said I was going to be reading from some prepared notes that I somehow took notes from the comments that were made. And then for whatever reason, he now believes that Charlie Clark from the chamber wrote my comments that I read.
Q Is this email where he says, "Is she fit to run the Boys and Girls Club" copied to press, again?
A It is.
Q And who in particular?
A Zach Murdock is with *The Island Packet*. He was the primary reporter that was covering town government things at the time.
Q The following Sunday did --
MR. WALKER: And by the way, Plaintiff moves Exhibit 16 into evidence.
THE COURT: Any objection?
MR. BREWER: No objection, Your Honor.
THE COURT: Admitted.
(WHEREUPON, Plaintiff's Exhibit Number 16 was entered)
Q Did Mr. Hoagland follow through on his threat that

he was going to publish a newspaper ad?
A Yes, he did.
Q I'm going to ask you to go to Plaintiff's Exhibit 17, please.
It's a little bit difficult to read, but what is the day of this ad?
A November --
Q Is it Sunday, November 29?
A Yeah. You're right. I sorry, I just can't see it.
Q Okay. What is the title of his article/ad?
A "My long war with the Hilton Head Island-Bluffton chamber and Hilton Head Island town council is not over: It's just beginning."
Q Did that "It's just beginning" resonate with you given what he had said about your job?
A It did. It did. I felt like he had made threats multiple times in emails and now he was prepared to make good on those threats.
Q Although there's specific reference to you in this article is down about the third paragraph where your name starts the paragraph.
Would you please publish that?
A "Kim Likins, known by me to be a close friend of the chamber public relations manager lied when she said she had listened to all of the comments."

MR. WALKER: Your Honor, Plaintiff moves Exhibit 17 in.

MR. BREWER: No objection.

THE COURT: Admitted.

(WHEREUPON, Plaintiff's Exhibit Number 17 was entered)

Q Did Mr. Hoagland continue his emails that day?

A Yes, sir, he did.

Q If you would go to Plaintiff's Exhibit 18.

Is that another email that was either sent to you by Mr. Hoagland or copied to you?

A I was copied on this one.

Q You were referenced on the second page. So I'm not going to have you go over the full email. But if you go to the second page about halfway through the large paragraph in the middle of the page. Are you with me?

A I am. "In fact Kim Likins lied and John McCann as well when he said he had already made up his mind last night totally abusing and disrespecting public opinions. They are not fit for public office."

MR. WALKER: Plaintiff moves Plaintiff's Exhibit 18 into evidence.

MR. BREWER: No objection.

THE COURT: Admitted.

(WHEREUPON, Plaintiff's Exhibit Number 18 was

entered)

Q Did things start to take a turn after that in the direction of his efforts with you?

A They did.

Q What was that turn?

A They became more personal and more attacking at my workplace.

Q I'm going to have you go to Plaintiff's Exhibit 19. Are you familiar with that email? Did you receive it?

A I did. It was to me from Mr. Hoagland on December 3rd.

Q And what is the subject of the email?

A "Kim Likins employment."

Q And is anybody copied?

A Yes. Charlie Clark is copied on this one.

Q Up to this point, had you had any conversations with Charlie Clark about the chamber contract and your vote?

A None at all.

Q Would you please go over this email. Read it.

A "We do not need anyone who lies and has conflicting our Boys and Girls Club or serving on town council. Kim I expect two things you either resign or are terminated. I can assure you that one of the two will happen."

Q And does he put thanks after that?
A Yeah, he does.
Q What was your reaction when you saw that he now was saying specifically that you either resign or you are going to get terminated and he was assuring you one of those was going to happen?
A Absolutely. I mean, he was basically saying that I had promised you that you were going to pay for this if you did not vote the way I wanted you to vote and now I'm fulfilling that promise. And you're going to end up resigning or you're going to end up being terminated and I am going to make sure one of the two happens.
Q Did you know him by this point to be dogged?
A Absolutely.
Q Relentless?
A Relentless.
Q Did you expect him to back off?
A No. No. He was angry and he's a bully. And he does not stop.

MR. WALKER: Your Honor, could we just take five minutes.

THE COURT: Absolutely. Ms. Likins, you can step down just don't talk to anybody about your testimony, please.

All right. Let's take about ten minutes.

(There was a short break taken)

MR. WALKER: Your Honor, thank you for taking that break.

THE COURT: Sure, man. If you need anything, let me know. We're at your beck and call since it's a nonjury day.

CONTINUED DIRECT EXAMINATION BY MR. WALKER:

Q Kim, I'm going to go back to Plaintiff's Exhibit 19 because I have not finished with it. I'd like you to go to the bottom paragraph there and would you read -- publish that -- read that, too?

A "Note Charlie Clark lied we have proof, as well as used a puppet of David Tigges and Bill Miles. We have info and more from inside whistleblower and will become part of our lawsuit and depositions. You both will be deposed."

Q Did you lie about Charlie Clark in anyway that you know of?

A No, sir. Not that I know of.

Q How did you interpret his sentence, "We have this info and more from inside whistleblower and will become part of our lawsuit in depositions"?

A Well, it definitely came across as he intended to file a lawsuit. I'm not sure exactly what it would be for, but that he was going to file a lawsuit against me.

Q To this day, do you know of any so called whistleblower that's ever been identified to your knowledge?

A Not to my knowledge. I've never heard of anyone.

Q Let's go now to Exhibit 22.

THE COURT: Are you going to admit Number 19?

MR. WALKER: Yes. We would admit 19 if we have not done so already.

THE COURT: If you have, I don't have it down.

MR. BREWER: No objection, Your Honor.

THE COURT: All right. Admitted.

(WHEREUPON, Plaintiff's Exhibit Number 19 was entered)

Q Let's go to 22. Do you recall receiving Exhibit 22?

A I do.

Q And what is the date of that email?

A This is Tuesday, December 8th of 2015.

Q And who is that directed to?

A It is written to me from Mr. Hoagland.

Q What is the subject?

A The subject says, "Kim Likins loses 100k in scam to another town clown."

Q Would you please read out loud the text of this email and then tell us what it's about?

A Sure. "Kim look at your comments after you lost 100k with your own money not taxpayer money. This will be forwarded and used in your deposition! You must be proud of yourself."

Q And keep going to the last sentence, please.

A Okay. "And can tell you the ongoing appeal of the economic council and now recent request for 1m based in no track record of success will be questioned." (Verbatim)

Q Would you tell Judge McIntosh what this is all about?

A So what the attachment is about?

Q Yes. What this whole investment thing was about?

A Okay. So this was a gentleman who, I believe, he was a professor at Charleston Southern and my mother had a good friend who had known him and his family for years and on the side he had kind of a finance business where he did investments for individuals and had done her investments for probably 30 or 40 years.

When my father passed away, my mother had not really dealt at all with the finances. She was a stay-at-home mom. And so based on the advice of her friend, she created accounts with this gentleman in my name, my brother's name, and my sister's name and put money in those accounts.

And then over the course of probably the next year or so, each of us put some of our own additional money in these accounts. And it came to be that Al Parish was really just a Ponzi scam. And it was discovered that he was a fraud and that he had taken the money and used it for his own personal gain. It was much like a Bernie Madoff situation.

Q Were there attachments to this email, Kim?

A Yes. So what Mr. Hoagland did, apparently, was have someone research the internet to find out whatever he could about me and my personal life. This came up because it happened to be in, I believe, *The Post and Currier* in Charleston, so he found the information. He took his own interpretation of what happened, included the article, photographs from the website, and then put together this PowerPoint presentation.

Basically trying to disgrace me and show that I was irresponsible and certainly couldn't be trusted with overseeing the funds of the town much less the Boys and Girls Club.

Q Did he limit his little package to you or did he send it to others?

A He sent it to others.

Q Who did he send it to that you know of?

A He sent it to my fellow council members and he sent

it to the leadership of our board at the Boys and Girls Club. And it may have actually gone to the remainder of the board members. But I know that it went to all of the leadership of the board.

MR. WALKER: Your Honor, Plaintiff moves 22 into evidence.

MR. BREWER: No objection.

THE COURT: Admitted.

(WHEREUPON, Plaintiff's Exhibit Number 22 was entered)

Q What was the significance of this to you?

A Well, I think Mr. Hoagland had made it clear in his previous email that I was either going to resign or I was going to be terminated and this was just his first step in making sure that that was going to happen. He was, you know, putting the pressure on me. He was going to show me that he was willing to humiliate me and embarrass me. And also dig deep into whatever privacy I have to find anything out there that he could throw out publicly and privately to my employers to make them feel like there's a reason that I can't do my job.

Q Is the income that you make from your job at the Boys and Girls Club important to you and your husband?

A Absolutely. I've always worked. I've always had a job. We are a two parent income family.

Q Putting aside the money, is the work itself of value to you?

A The work itself means more to me than the money. This is a job that I know that I believe I'm called to do and be at. I believe that god uses me in incredible ways there. And I believe that those children need me and that staff needs me. And it would be heartbreaking, heartbreaking to not be able to be a part of that organization.

I've seen so much incredible transformational change from where we had helped children go from living in poverty to going to college. That will break that cycle and they'll never live like they've lived before. That is an incredible thing to be a part of.

Q Who is Mike Briggs?

A Mike Briggs is one of my board members.

Q Is he here in the courtroom today?

A He is.

Q Would you point him out to the judge?

A He's in the audience and Mike was the chairman of my board in 2015 when this was all going on.

Q How about Marv Lich?

A Marv Lich was also on my board and then rose to be the chairman of the board of the Lowcountry.

Q Did one or both of them meet with you about

communications they had received from Mr. Hoagland?
A Yes, they did.
Q How did you feel about the Boys and Girls Club being drawn into this -- Mr. Hoagland's line of fire?
A I mean, it was obviously terribly embarrassing. And then I just felt horrible for them because these are individuals who are volunteers. They're volunteering their time to serve on a board to help take care of the most vulnerable children of our community and now all of a sudden they're being harassed, the organization is being targeted, and all of it was just simply because I voted on a public issue the way my conscience felt that I should vote and it was just not the way Mr. Hoagland wanted.
Q Did the Boys and Girls Club, to your knowledge, because it has to be based on your knowledge, did the Boys and Girls Club look into this with the national organization?
A Absolutely. After Mr. Hoagland reached out to them and spoke to them and demanded that I be fired, told them that I was a danger to be around children and that I was a liar and I was corrupt, they moved to kind of what we consider crisis communication within an organization because their job is to protect the organization.

As board members that's what they're supposed to do. And so they reached out to Boys and Girls Club of America in Atlanta to have a conversation with them just about what was going on and what would need to be done or considered if it escalated.

Q Ultimately, did -- was a decision made by leadership to keep you or terminate you?

A Ultimately, they decided to keep me.

Q Even though they decided to keep you were there any ongoing concerns?

A Absolutely. I knew that just because they were going to reject his request to fire me that that was not going to stop Mr. Hoagland. I mean, nothing had stopped Mr. Hoagland at this point. He doesn't really take no for an answer from anyone. If he believes something needs to happen, he's going to make it happen.

And so while I deeply appreciated what they did, I knew that that was not going to be the end of it.

Q Even though they made that decision to keep you, did you emotionally continue to struggle with this?

A Oh, absolutely. Because I knew that Mr. Hoagland wasn't going to stop, every day was just a day of just constantly being anxious and on edge of what he was going to do next. I mean, I guess panic stricken is probably the best way that I could describe it. Because

I would just wake up in the morning and not know if there was going to be something published in the paper. Whether he was going to have reached out to other people. If he was going to be sending more emails. But I knew that he wasn't going to stop.

Q Why did you bring this lawsuit back in December of 2015 and does it have anything to do with what you were just saying?

A Absolutely. I did it just because I want him to stop harassing me at work and my board members and my organization. The board and the organization are innocent parties in this. They have done nothing wrong. And this is my private life. I go to work every day to make a living for my family and it has absolutely nothing to do with a vote that I made on council.

And I just don't think that it's fair that Mr. Hoagland has the ability to come into my workplace and harass me and the organization and particularly to make accusations that he has never ever substantiated. He's never in any way shown that I'm a liar, that I'm a danger to children. And so I just -- I think that that just shouldn't be allowed and I would just like to have protection from that so that I can go to work and know that I don't have to worry about him anymore.

Q Ms. Likins, did Mr. Hoagland take out a second

newspaper ad that directly referred to you?
A Yes, sir, he did.
Q And I'm going to direct your attention to Exhibit 108, please. Do you have that there in front of you?
A I do.
Q We don't have the date at the top of this one as we did on the earlier one, but do you recall the approximate day this --
A It was in June.
Q Of what year?
A Of 2016.
Q Is this on the same subject as the earlier ad?
A Yes, sir. He's still upset about the fact that four of us voted for the chamber contract. He says, "Council members Likins McCann Lennox and Harkins have betrayed the town and taxpayers by selling out to Bill Miles and the Hilton Head Island-Bluffton chamber."
Q Would you go down to the paragraph a little over halfway down that starts with "They approved"?
A Yes. "They approved a corrupt chamber contract that is not worth the paper it is written on. In fact, it appears that the contract development process was controlled by Bill Miles and his attorney David Tigges. Town manager Steve Riley then cooperated with the chamber and Likins, McCann, Lennox and Harkins to get

the contract approved despite the public outcry against it last November. In fact, we have a chamber board member on record and on video who said the chamber worked hard on this contract."

Q This raises just a side point here that I'd like to quickly address. After the vote on November 17th, did anybody return to town council to talk about the chamber contract?

A No, sir. There were two individuals, Mr. Hoagland and a gentleman named Peter B, I don't remember how to pronounce his last name, but they were the only two individuals that came and spoke about the contract after the vote. And none of my constituents that I represent on the island ever called me and said that they were upset with the way that I voted that night.

Q Would you drop down two more paragraphs, please, Kim, to the second paragraph. It's not the second paragraph, but another paragraph that starts "They approved," read that.

A "They approved the use of taxpayer money to pay lawyers to file a private lawsuit against me. After I challenged Kim Likins who I think is unfit to work her day job with boys and girls on her actions and called her employer to inform them of her actions as a public official, she schemed with the other council members and

town lawyers to pass an outrageous resolution to file a lawsuit against citizens that make public speeches they don't like."

Q Do you know of your own knowledge whether the communications with her employer were simply to inform them of your actions as a council person? Were they limited to that?

MR. BREWER: Objection. Leading, Your Honor.

MR. WALKER: All right.

THE COURT: I assume that you're rephrasing your question over here; is that correct? I sustain the objection. If not, just for the record.

MR. WALKER: I think it's self-evident and will be self-evident from the proof and I don't need to go through it again for you.

THE COURT: All right. Thank you, sir.

MR. WALKER: Thank you. Your Honor, we would move Plaintiff's Exhibit 108 into evidence.

MR. BREWER: No objection.

THE COURT: What's the date of that?

A It's June. I don't know the exact date.

MR. WALKER: And we have a 108A, Your Honor, I think that may have the date. June 26, 2016. It's a better copy of it that shows it up at the top. Sunday, June 26, 2016.

Q By the way, how did you discover this ad this Sunday in June?

A So it happened to be a weekend that my family was visiting and my brother was actually the first person who sat down to look at the newspaper that morning and opened it and read it. And so, of course, he called me in. And then shortly after my phone rang and it was a good friend of mine who had read the ad and she was horrified particularly at the way the statement about boys and girls were -- was phrased. Because it wasn't even saying Boys and Girls Club at that point, he's literally saying that I'm unfit to work with boys and girls. Which in her opinion was giving very specific connotations that were very negative.

Q I'm now going to go to an email that was soon before this newspaper ad and it's Plaintiff's Exhibit 105. Do you have that, Ms. Likins?

A Exhibit 105, yes, sir.

Q All right. What -- who sent this email?

A Mr. Hoagland.

Q And what is the date of the email?

A June 21, 2016.

Q And without going through every individual, who are some of the folks that it's copied to?

A My attorneys, the other council members. I'm

trying to see.

Q If you go down to the bottom --

A Town staff, the newspaper, you know, Brian Tolley was the editor of the paper and Steve Austin worked for the paper. So, again, a lot of the same individuals.

Q And I'd ask you to go to the second page, please. And go down about a little over a third of the way, almost halfway down there's a paragraph that starts "Money." Do you see that?

A I do.

Q Would you read that for us?

A "Money to file a frivolous lawsuit against me on behalf of Ms. Likins. And I repeat, she is a liar and unfit for her role on the council or her private sector job. And she will not get away with her lies. I will beat her in court and expose her as the fraud that she is."

MR. WALKER: Your Honor, we move 105 into evidence.

THE COURT: Any objection?

MR. BREWER: No objection, Your Honor.

THE COURT: Number 105 and so is 108A and 108 if I haven't put that on the record earlier.

MR. WALKER: Thank you, Your Honor.

(WHEREUPON, Plaintiff's Exhibit Numbers 105, 108 and 108A was entered)

Q Kim, we've looked at a number of emails, but has there been other emails that you have received either directly or been copied on?
A Probably hundreds.
Q Have they stopped?
A No. I received four the other day within a matter of about two hours.
Q Is Skip Hoagland here today in the courtroom?
A No, sir.
Q Do you believe that any amount of money can compensate you for any injury that's done to you --
MR. BREWER: Objection, Your Honor. Relevance.
THE COURT: Overruled. Go ahead.
Q How do you feel about any collateral damage to the Boys and Girls Club as a result of what Mr. Hoagland has done and what he's doing?
A I mean, I just believe that the Boys and Girls Club is an excellent organization and does amazing things for our community. This year it's celebrating its 30th anniversary. When I think about the children that have been through that club who typically are children that go from first grade all the way through high school, it does not deserve to have its reputation tarnished in any way.
And I believe that I have represented that

organization well and I don't believe that I deserve to have my reputation tarnished as the director of that organization. We solely depend on people believing in us and have confidence in us to be able to raise the donations that we raise to take care of the kids that we take care of. And it's a tremendous liability to have this kind of stuff published about the organization itself and about me as the leader of that organization.

Q What is your objective in having us seek an injunction on your behalf moving forward? What is it that you are asking for?

A I'm asking for peace of mind. I'm asking you for the ability to please be able to go to my job and not ever have to worry about Mr. Hoagland doing anything to harm that organization or me within the context of my work. He is a vendettive person. And I know that if he has the ability, he will want to come back and harm me.

Q Do you have -- are you seeking to enjoin him from speaking or sending emails?

A No. Never. And I have never ever tried to shut Mr. Hoagland down from speaking about anything associated with council. As a matter of fact, we had a council meeting because he was becoming so disruptive that our mayor at the time wanted to say that we need to just shut him down so that we can continue and get

business done. And a vote was taken and I voted in favor of continuing to allow Mr. Hoagland to speak. And for the next four years as I served on council and he came meeting after meeting after meeting, I sat at that dais completely respectful and I let him say everything he wanted to say and target me over and over again.

And I understand that he has the right to do that. And when he writes about the fact that I should be booted off council or that I can't be reelected, I appreciate the fact that that is his right to say those kinds of things and I've never tried to stop him from doing that.

Q When was your last day on town council?

A In December of 2018.

THE COURT: December 23 when?

A It was December of 2018.

THE COURT: December 2018.

MR. WALKER: One moment, Your Honor.

Q Do you have any ongoing apprehension or concerns that based on past experience that Mr. Hoagland might contact your employers or your employment in the future?

A I absolutely do. I mean, Mr. Hoagland has multiple times broken orders from this court. And I have no doubt that if he decides that it's a way to embarrass me or harm me, particularly when all of this is done, that

he would feel no conscience whatsoever to go back and try to do all of this again.

Q Does Mr. Hoagland have a base out of this --

THE COURT: Go ahead, please.

MR. WALKER: Thank you very much.

Q Does Mr. Hoagland have a base of operations outside this country?

A Yes. Most all of his emails come from Argentina.

Q Thank you.

THE COURT: Would you show the court reporter Exhibit 13, please, sir.

MR. WALKER: Yes, sir. Thirteen was the video and we did not put it into evidence. We can we can offer that portion of the video into evidence.

THE COURT: Let's go ahead and admit it since it's been played anyway.

MR. WALKER: All right. Plaintiff would offer into evidence the video of the town council meeting dated November 17, 2015. Starting at -- on the timeline at 2 hours 55 minutes 9 seconds through 2 hours 59 minutes 30 seconds. Thank you.

THE COURT: All right. That's admitted.

(WHEREUPON, Plaintiff's Exhibit Number 13 was entered)

THE COURT: Cross examination?

MR. BREWER: Thank you, Your Honor. May it please the Court.

THE COURT: Yes, sir.

MR. BREWER: Court's indulgence while I move some exhibits over here.

THE COURT: Sure.

CROSS EXAMINATION BY MR. BREWER:

Q Ms. Likins, how are you today?

A Good, thank you.

Q Good. Good. Good. Now, you don't deny, do you, that Mr. Hoagland in his speeches at town council and to you was promoting an issue of transparency with the DMO contract and asking you as a town council person to put together tougher auditing provisions into that DMO contract so that the taxpayers could verify how the chamber will spend their money?

A Mr. Hoagland wanted us to include a forensic audit in the chamber contract. And it's my understanding that a forensic audit is done when there is some type of evidence that there is misconduct going on. And we had never ever had any suggestion that there was any type of misconduct going on with the funds associated with our chamber. And so I did not feel like that we should put a forensic audit in the contract.

Q Ms. Likins, do you remember giving a deposition in

this case on September 27, 2017?

A Yes, sir.

MR. BREWER: Your Honor, may I approach the witness with a copy of her deposition?

THE COURT: Yes, sir. If you would open that up and make that a Court exhibit.

(WHEREUPON, Defendant's Exhibit Number 1 was marked and entered)

Q Ms. Likins, would you turn with me to page 149 of your deposition. And just let me know when you get there.

A Okay. 149?

Q 149. And I'm going to start at line 24. Tell me when you get there.

A Is that Mr. Alford saying, "Object to the form"?

Q No. Page 140 -- I apologize. It's 148. I said 149. I'm so sorry. The page before. Starting at line 24 and where it says, "And given Mr."

A Yes.

Q I'm going to read the question if you'll tell us the answer.

"And given you clearly have disagreements with Mr. Hoagland, but you can't deny that he was promoting an issue of transparency in asking the Town of Hilton Head to put tougher provisions for how we audit or check

or verify the Chamber of Commerce is spending taxpayer dollars?" And your answer at line 8 was?

A "Yes, he was."

Q Thank you. Now, obviously you've given testimony that Mr. Hoagland believes you're a liar; is that correct?

A Yes, sir.

Q And Mr. Hoagland believes you lied because you said in your speech that approving the DMO contract, you had written down your notes, and he thought someone from the chamber wrote those notes for you, didn't he?

A He did.

Q And that someone is Charlie Clark?

A That's correct.

Q Now, I understood your testimony earlier about Steve Riley meeting with him and him producing an email to you with almost a verbatim version of your speech just the day before; is that correct?

A Yes.

Q And what Steve Riley produced to you had a lot of talking points that the Chamber of Commerce provided to Steve Riley?

A No. It had talking points that I provided to Steve Riley when we had breakfast.

Q When -- let's pull up -- let me go back then. I'm

going to build up to when Steve Riley and you met regarding the speech that you ultimately gave on November 17, 2015.

On November 3, 2015, *The Island Packet* printed an article that had a notice of meeting that the Town of Hilton Head had published to the town asking for the public to come to the November 17th meeting and give their comments after their first glimpse of the contract; isn't that correct?

A That sounds correct. Yes.

MR. BREWER: Permission to approach Ms. Likins with what we have marked for identification purposes as Exhibit 22, but we would mark as Defendant's 1 in the trial.

(WHEREUPON, Defendant's Exhibit Number 2 was marked and entered)

Q Handing you an exhibit which is marked as Defendant's 1 and is this the public notice regarding the meeting that was going to happen at the -- at the town regarding the review of the contract?

A Yes. It looks like it was written by Zach, a reporter at *The Island Packet* talking about the chamber contract being revealed this week and that it would be voted on on November 17th. And that we wanted concerned residents to bring their comments and questions to the

council meeting.

Q All right. Now, this notice for the public to come and give their comments at the November 17th town council meeting would seem to imply that town council had an open mind walking into that meeting, wouldn't it?

A Certainly to listen to everyone's comments. Yes.

Q But, in fact, you didn't come to that meeting with an open mind listening to the comments, you had already made up your mind in advance and prepared a speech accordingly; correct?

A I had made up my mind. And I will tell you that almost every time I had to vote on something, I studied and worked and made up my mind before I walked in there. I won't say that I was never moved and changed my mind. Because if new things were presented differently or new comments were made, my opinion could be changed. But I always felt it was important to do my work ahead of time so that when I went in, I was prepared to cast my vote.

MR. BREWER: Your Honor, permission to approach Ms. Likins with what will be marked as --

THE COURT: Go ahead and get them marked then approach, please.

MR. BREWER: I'm sorry, Your Honor.

THE COURT: Go ahead and have them marked, please, and numbered and then approach the witness with it,

please.

(WHEREUPON, Defendant's Exhibit Number 3 and 4 was marked and entered)

Q Ms. Likins, I'm handing you what's been marked as Exhibit 3 and 4. This is an email that you provided to us from Steve Riley, the town manager of the Island of Hilton Head to you on November 17, 2015 attaching the clips for the speech to you; is that correct?

A There's more detailed information from me to include, yes.

Q And, in fact, nothing on here indicates these were your comments that you gave to him. In fact, what it reads is, "If you want to get more specific. There are more than $3,000 DMOs of which 196 are accredited. For chamber accreditation as opposed to the five star -- (as opposed to the four star rating) there are $7,000 chambers and ours is only one of 213 that are accredited;" is that correct?

A That's correct. And I had asked Mr. Riley if he would provide that information to me when we had breakfast. I knew that our chamber was one of a certain number that had that accreditation, but I didn't know how many. And the same way with the DMI.

Q There's absolutely no indication that you had written these sections in the attached speech before

Steve Riley sent it to you; isn't that correct?

A So, I'm sorry, could you clarify the question for me?

Q Nothing in writing indicated that you actually prepared these comments that he sent to you in a Word document attached to his email; right?

A Oh, no, there's nothing in writing. Just that I'm telling you that I had breakfast with him and that's what I did.

Q Isn't the reality that what made people so upset is that these didn't sound like your words? It sounded like boilerplate clips from the Chamber of Commerce puffing up their contract that you just reincorporated into a speech?

THE COURT: Just one second.

MR. WALKER: Objection.

THE COURT: What is your objection?

MR. WALKER: The facts are not in evidence. He said that made people so upset. There's no proof that anybody was upset other than Skip Hoagland. And sounds the way he asked the question he's implying that people were generally upset with something she didn't. She testified that the only people even came back to council were Skip Hoagland and his Lieutenant Peter B --

THE COURT: I sustain the objection. Rephrase. The

only thing there was is about the half and half for or against, nothing about people being upset. Go ahead.

Q I'm sorry, Ms. Likins, isn't the case that the language in both your speech and in Steve Riley's speech both include boilerplate talking points that sound like propaganda from the Chamber of Commerce that you just repackaged into your speech the next night?

A I would disagree with that. There's clearly information in my speech that had been provided to all of us as council members through various documents from the chamber throughout their presentations to us. But what I wanted to say to the community was from my personal thoughts. When I talk about things like these being -- the board members being individuals that we know and that we can trust, that's something that I'm saying from my heart and something that I believe. It's not something that has been sent out in emails from the Chamber of Commerce.

MR. BREWER: Madam court reporter, please mark this exhibit as Exhibit 5, I think.

(WHEREUPON, Defendant's Exhibit Number 5 was marked and entered)

Q So what is currently marked as Defendant's Exhibit 5, but will be Number 4 once it's corrected. Is this a copy of your speech to Steve Riley -- or excuse me, your

speech that you gave on November 17, 2015?
A Yes. It's the basis of my speech. I don't think when you compare it to the tape it's exactly word per word. There were things that I said differently or changed. But that this is a copy of my notes when I took and rewrote them to take with me that night.
Q I'd like to look at a portion of it. The end of your speech says, "I have deep respect for the chamber board of directors and its employees. These individuals both past and present, have been and continue to be respected, responsible, and successful business owners and operators who are also our neighbors and friends;" correct?
A Correct.
Q Now, Charlie Clark was a member of the chamber; correct?
A She's an employee of the chamber.
Q She is a vice president of marketing and, therefore, a spokes person for the chamber; correct?
A Correct.
Q She is someone you considered a friend; correct?
A I consider Charlie a casual friend.
Q You went on to say, "They are people whom we know, work with, serve with, worship with, coach with and often interact with on a daily basis. Many of our

children have grown up together and been in each other's homes." Charlie Clark, I think you testified earlier, is someone your children have grown up with; correct?

A Yes. My children have grown up with Charlie's children going to school. I have never been in Charlie's home. She's never been in my home. I don't even know where Charlie Clark lives on the island.

Q You got emails back and forth between you and Charlie Clark talking about getting together for tailgating parties and having a glass of wine, don't you?

A I have emails where Charlie Clark and I have had lunch or dinner probably in the 20 years that I have known her, five to seven times. Most of them have something to do with our kids' club tennis team getting together. Our children at school's organizations closing over. She also worked on some things that were directly associated with the town, a committee that I was on which was an arts and cultural committee that she was appointed to and it was my town committee as the representative, so we exchanged emails associated with that. She read and proofed some things for me associated with that.

But my relationship with Charlie Clark is like it is with hundreds of other people in a town our size.

Our paths cross here and there, but that's it.
Q Let me go back to a demonstrative I have on the screen, this is a comparison of your speech with the Steve Riley speech that he sent you. Now let's be fair. When you said in your hearing in the town council hearing November 17, 2015 that you had prepared your comments. And the reality is you didn't even type them. Steve Riley typed all those comments on the left; correct?
A Steve Riley typed the email that he sent to me and then I took what I wanted to use out of those comments that I had given to him and discussed with him at breakfast and rewrote a document that I wanted to take with me to represent my feelings on the contract.
Q Now, we can look at the comparison, but isn't it fair that the version of the speech that Steve Riley typed and sent to you constitutes 90 percent of what you gave in your speech and what you included in your speech at the November 17, 2015 town council meeting?
A Well, Mr. Brewer, I would imagine that it would since it was what he and I talked about.
Q And, in fact, the end of your speech, the last paragraph said, "I have faith that these community leaders will never stand for fraud and that they have the best interests of our community at heart;" right?