

STATE GRAND JURY OF SOUTH CAROLINA

STATE OF SOUTH CAROLINA)
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 v.)
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 DALHI NANETTE MYERS,)
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 Defendant.)
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Case No. 2020-GS-47-21

INDICTMENT FOR:

**MISCONDUCT IN OFFICE
(2 COUNTS);**

**USE OF OFFICIAL POSITION FOR
PERSONAL GAIN
(10 COUNTS);**

**EMBEZZLEMENT
(10 COUNTS);**

**DRAWING AND UTTERING A
FRAUDULENT CHECK, VALUE MORE
THAN \$5,000.00
(1 COUNT)**

**USE OF CAMPAIGN FUNDS FOR
PERSONAL EXPENSES
(1 COUNT)**

At a session of the State Grand Jury of South Carolina, convened in Columbia, South Carolina, on December 17, 2020, the State Grand Jurors present upon their oath and charge as follows:

**COUNT ONE
MISCONDUCT IN OFFICE
(Common Law – CDR 0115)**

That from on or about March 2018 to on or about May 2020, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council

District 10, a public official, willfully and dishonestly fail to properly and faithfully discharge the duties of her public office imposed upon her by law; to wit:

MYERS expended public funds belonging to Richland County, which were entrusted to her care in the form of a Richland County purchasing card, in order to pay personal expenses and debts, including but not limited to those arising from personal travel, lodging, dining, shopping, telecommunications, gifts to individuals both related and unrelated to her, and to non-person entities with which she is associated, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business. Therefore, MYERS did, by malfeasance, misfeasance, and nonfeasance, commit acts and omissions in breach of her duties of good faith, honesty, and accountability to the public.

This done in violation of the Common Law of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT TWO
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)

That from on or about March 28, 2018, to on or about April 4, 2018, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, knowingly use her official office to obtain an

economic interest for herself, a family member, an individual with whom she is associated, and a business with which she is associated; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to cover the costs of a personal trip to the State of Georgia, including but not limited to a tire for her personal vehicle, fuel for her personal vehicle, food, drink, and lodging, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT THREE
EMBEZZLEMENT
(S.C. Code Ann. § 16-13-210 – CDR 3460)**

That from on or about March 28, 2018, to on or about April 4, 2018, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, and while responsible for the safekeeping, transfer, and disbursement of public funds, embezzle and convert to her own use less than ten thousand dollars (\$10,000), with the intention to defraud Richland County Government; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to cover the costs of a personal trip to the State of Georgia, including but not limited to a tire for her personal vehicle, fuel for her personal vehicle, food, drink, and lodging, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT FOUR
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)**

That from on or about August 14, 2018, to on or about August 16, 2018, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, knowingly use her official office to obtain an economic interest for herself, a family member, an individual with whom she is associated, and a business with which she is associated; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase airline fare for a trip to Detroit, Michigan, without a legitimate government purpose for doing so,

and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT FIVE
EMBEZZLEMENT
(S.C. Code Ann. § 16-13-210 – CDR 3460)**

That from on or about August 14, 2018, to on or about August 16, 2018, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, and while responsible for the safekeeping, transfer, and disbursement of public funds, embezzle and convert to her own use less than ten thousand dollars (\$10,000), with the intention to defraud Richland County Government; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase airline fare for a trip to Detroit, Michigan, without a legitimate government purpose for doing so, and thereafter provided false and inconsistent explanations for the expenditures to

conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina; such conduct involving public corruption and arising out of or in connection with a crime involving public corruption and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT SIX
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)**

That from on or about February 20, 2019, to on or about February 26, 2019, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, knowingly use her official office to obtain an economic interest for herself, a family member, an individual with whom she is associated, and a business with which she is associated; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to cover the costs of a personal trip to Greece, including but not limited to airfare, lodging, food, drink, and duty free goods, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT SEVEN
EMBEZZLEMENT
(S.C. Code Ann. § 16-13-210 – CDR 3460)**

That from on or about February 20, 2019, to on or about February 26, 2019, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, and while responsible for the safekeeping, transfer, and disbursement of public funds, embezzle and convert to her own use less than ten thousand dollars (\$10,000), with the intention to defraud Richland County Government; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to cover the costs of a personal trip to Greece, including but not limited to airfare, lodging, food, drink, and duty free goods, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina; such conduct involving public corruption and arising out of or in connection

with a crime involving public corruption and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT EIGHT
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)**

That from on or about May 11, 2019, to on or about May 15, 2019, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, knowingly use her official office to obtain an economic interest for herself, a family member, an individual with whom she is associated, and a business with which she is associated; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to cover the costs of a personal trip to Northern Illinois University, including but not limited to airfare for herself and family, lodging, food, drink, consumer technology, and a rental vehicle, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT NINE
EMBEZZLEMENT
(S.C. Code Ann. § 16-13-210 – CDR 3460)**

That from on or about May 11, 2019, to on or about May 15, 2019, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, and while responsible for the safekeeping, transfer, and disbursement of public funds, embezzle and convert to her own use less than ten thousand dollars (\$10,000), with the intention to defraud Richland County Government; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to cover the costs of a personal trip to Northern Illinois University, including but not limited to airfare for herself and family, lodging, food, drink, consumer technology, and a rental vehicle, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina; such conduct involving public corruption and arising out of or in connection with a crime involving public corruption and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT TEN
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)**

That from on or about September 27, 2019, to on or about September 29, 2019, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, knowingly use her official office to obtain an economic interest for herself, a family member, an individual with whom she is associated, and a business with which she is associated; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase lodging, food, and drink from the Gaylord Opryland Hotel in Nashville, Tennessee, without a legitimate government purpose for doing so, and thereafter provided false and inconsistent explanations for the expenditure to conceal the absence of any link between the expense and legitimate government business.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT ELEVEN
EMBEZZLEMENT
(S.C. Code Ann. § 16-13-210 – CDR 3460)**

That from on or about September 27, 2019, to on or about September 29, 2019, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, and while responsible for the safekeeping, transfer, and disbursement of public funds, embezzle and convert to her own use less than ten thousand dollars (\$10,000), with the intention to defraud Richland County Government; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase lodging, food, and drink from the Gaylord Opryland Hotel in Nashville, Tennessee, without a legitimate government purpose for doing so, and thereafter provided false and inconsistent explanations for the expenditure to conceal the absence of any link between the expense and legitimate government business.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina; such conduct involving public corruption and arising out of or in connection with a crime involving public corruption and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT TWELVE
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)**

That from on or about June 13, 2018, to on or about August 14, 2018, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, knowingly use her official office to obtain an economic interest for herself, a family member, an individual with whom she is associated, and a business with which she is associated; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase consumer goods for personal use from and settle debts owed to Verizon Communications Inc. and/or its subsidiaries, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT THIRTEEN
EMBEZZLEMENT
(S.C. Code Ann. § 16-13-210 – CDR 3460)**

That from on or about June 13, 2018, to on or about August 14, 2018, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, and while responsible for the safekeeping, transfer, and disbursement of public funds, embezzle and convert to her own use less than ten thousand dollars (\$10,000), with the intention to defraud Richland County Government; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase consumer goods for personal use from and settle debts owed to Verizon Communications Inc. and/or its subsidiaries, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina; such conduct involving public corruption and arising out of or in connection with a crime involving public corruption and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT FOURTEEN
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)**

That from on or about May 2, 2018, to on or about September 6, 2019, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, knowingly use her official office to obtain an economic interest for herself, a family member, an individual with whom she is associated, and a business with which she is associated; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase consumer goods for personal use from Staples, Inc., including but not limited to consumer technology, food, and drinks, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT FIFTEEN
EMBEZZLEMENT
(S.C. Code Ann. § 16-13-210 – CDR 3460)**

That from on or about May 2, 2018, to on or about September 6, 2019, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, and while responsible for the safekeeping, transfer, and disbursement of public funds, embezzle and convert to her own use less than ten thousand dollars (\$10,000), with the intention to defraud Richland County Government; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase consumer goods for personal use from Staples, Inc., including but not limited to consumer technology, food, and drinks, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina; such conduct involving public corruption and arising out of or in connection with a crime involving public corruption and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT SIXTEEN
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)**

That from on or about April 28, 2018, to on or about December 22, 2018, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, knowingly use her official office to obtain an economic interest for herself, a family member, an individual with whom she is associated, and a business with which she is associated; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase goods for use by herself and other persons and non-person entities with which she is associated from Walmart, Inc., d/b/a Sam's Club, including but not limited to clothing, gift cards, and snacks, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT SEVENTEEN
EMBEZZLEMENT
(S.C. Code Ann. § 16-13-210 – CDR 3460)**

That from on or about April 28, 2018, to on or about December 22, 2018, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, and while responsible for the safekeeping, transfer, and disbursement of public funds, embezzle and convert to her own use less than ten thousand dollars (\$10,000), with the intention to defraud Richland County Government; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase goods for use by herself and other persons and non-person entities with which she is associated from Walmart, Inc., d/b/a Sam's Club, including but not limited to clothing, gift cards, and snacks, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina; such conduct involving public corruption and arising out of or in connection with a crime involving public corruption and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT EIGHTEEN
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)**

That from on or about April 10, 2018, to on or about March 27, 2020, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, knowingly use her official office to obtain an economic interest for herself, a family member, an individual with whom she is associated, and a business with which she is associated; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase goods for use by herself and other persons and non-person entities with which she is associated from Barnes & Noble, Inc., including but not limited to books, premium chocolates, and a membership subscription, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT NINETEEN
EMBEZZLEMENT
(S.C. Code Ann. § 16-13-210 – CDR 3460)**

That from on or about April 10, 2018, to on or about March 27, 2020, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, and while responsible for the safekeeping, transfer, and disbursement of public funds, embezzle and convert to her own use less than ten thousand dollars (\$10,000), with the intention to defraud Richland County Government; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase goods for use by herself and other persons and non-person entities with which she is associated from Barnes & Noble, Inc., including but not limited to books, premium chocolates, and a membership subscription, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina; such conduct involving public corruption and arising out of or in connection with a crime involving public corruption and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT TWENTY
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)

That on or about September 25, 2018, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, knowingly use her official office to obtain an economic interest for herself, a family member, an individual with whom she is associated, and a business with which she is associated; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase goods and services from SmartPhone Medic for the repair of her personal phone, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT TWENTY-ONE
EMBEZZLEMENT
(S.C. Code Ann. § 16-13-210 – CDR 3460)

That on or about September 25, 2018, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public

official, and while responsible for the safekeeping, transfer, and disbursement of public funds, embezzle and convert to her own use less than ten thousand dollars (\$10,000), with the intention to defraud Richland County Government; to wit:

MYERS expended public funds belonging to Richland County, and entrusted to her care in the form of a Richland County purchasing card, in order to purchase goods and services from SmartPhone Medic for the repair of her personal phone, and thereafter provided false and inconsistent explanations for the expenditures to conceal the absence of any link between the expenses and legitimate government business.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina; such conduct involving public corruption and arising out of or in connection with a crime involving public corruption and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT TWENTY-TWO
DRAWING AND UTTERING FRAUDULENT CHECK, VALUE MORE THAN \$5,000
(S.C. Code Ann. § 34-11-60 – CDR 3386)**

That on or about June 3, 2020; DALHI NANETTE MYERS did, in Richland County, with intent to defraud, in her own name, draw, make, utter, issue, and deliver to another a check, draft, or other written order on a bank or depository for the payment of money or its equivalent, in exchange for value; to wit:

MYERS drafted a check payable to Richland County in the amount of \$27,000, when at the time of drawing, making, uttering, issuing, and delivering the check she

knew the account in the bank on which the check was drawn lacked sufficient funds on deposit with the bank to pay the same on presentation.

This done in violation of Sections 34-11-60 and 34-11-90 of the Code of Laws of South Carolina; such conduct involving public corruption and arising out of or in connection with a crime involving public corruption and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT TWENTY-THREE
MISCONDUCT IN OFFICE
(Common Law – CDR 0115)**

That on or about June 3, 2020, DALHI NANETTE MYERS did, in Richland County, while Councilperson for Richland County Council District 10, a public official, willfully and dishonestly fail to properly and faithfully discharge the duties of her public office imposed upon her by law; to wit:

In response to the revelation of certain questionable expenses on her assigned county purchasing card, MYERS drafted a check payable to Richland County in the amount of \$27,000, when at the time of drawing, making, uttering, issuing, and delivering the check she knew the account in the bank on which the check was drawn lacked sufficient funds on deposit with the bank to pay the same on presentation. MYERS thereafter provided a false explanation to Richland County to fraudulently conceal the fact that insufficient funds were on deposit with the bank at the time she drew, made, uttered, issued, and delivered the check. Therefore, MYERS did, by

malfeasance, misfeasance, and nonfeasance, commit acts and omissions in breach of her duties of good faith, honesty, and accountability to the public.

This done in violation of the Common Law of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT TWENTY-FOUR
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSES
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-1348(A) – CDR 2985)**

That on or about July 6, 2016, DALHI NANETTE MYERS did, in Richland County, while a candidate for the public office of Councilperson for Richland County Council District 10, knowingly use campaign funds to defray personal expenses which were neither related to her campaign nor the office for which she was a candidate, and did knowingly convert campaign funds to personal use; to wit:

MYERS expended funds from her campaign account to pay Pickrel, Schaeffer, and Ebeling, LPA, in order to satisfy personal debts and personal business debts owed and which arose from a contract executed on or about October 31, 2013, between Myers Business Lawyers, LLC and LexisNexis.

This done in violation of Sections 8-13-1348(A) and 8-13-1520 of the Code of Laws of South Carolina; such conduct involving public corruption and arising out of or in connection with a crime involving public corruption and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

A True Bill



FOREPERSON

Alan Wilson

ALAN WILSON (jejj)
ATTORNEY GENERAL