

Office of the State Inspector General

Brian D. Lamkin



Investigation of Sumter School District's Funding, Procurement and Construction of the Crestwood High School Athletic Field and Disposal of District Surplus Furniture

I. Introduction

The South Carolina Office of the State Inspector General (SIG) was established by the South Carolina General Assembly in 2012 (Act No. 105) for the purpose of investigating and addressing allegations of fraud, waste, abuse, mismanagement, and misconduct in agencies, specifically the executive branch of state government. These authorities, which include investigations of public schools, school districts and public charter schools and authorizers, are further defined in South Carolina Code of Laws, [§1-6-10 et seq.](#)

By letter, dated [5/20/2025](#), the South Carolina State Superintendent of Education requested that the SIG conduct an investigation of the Sumter School District (District) regarding the funding and procurement of the Crestwood High School athletic field construction and turf upgrades (Crestwood Project), as well as improper disposal of district furniture that potentially violated the state surplus property guidelines.

The SIG determined that while the funding of the Crestwood Project was permissible the District failed in its management of the Crestwood Project that resulted in excessive spending of taxpayer funds, unauthorized procurements and violations of the South Carolina Consolidated Procurement Code (CPC) and the District's procurement code. Additionally, the District violated state law and local county ordinances by advertising and commencing construction without the approval and permit from the Office of School Facilities, South Carolina Department of Education, as well as a lack of construction permits from local authorities. In doing so, the District exposed itself to wasteful expenditures, contractual liabilities that risked public safety, health, and welfare. When these issues were brought to the District's attention processes were corrected to ensure future procurements conformed to the CPC and the District's procurement code.

Among these failures were material weaknesses, lax internal controls, cost overruns and allowing public access to the facilities without a certificate of occupancy. As a result, the District exceeded Board-approved funding for phase one of the Crestwood Project by \$1,258,076.69. Several areas of concern are detailed in the Findings and Recommendations sections of this report. The SIG did not identify criminal activity or indication of fraudulent activity during this investigation.

Relating to the storage and disposal of surplus furniture, the SIG determined the state guidelines for disposal of surplus property did not apply to the District as its furniture inventory was property of Sumter County and not the state. However, the SIG determined the District failed to adhere to its own [procurement code](#) in the storage and disposal of this inventory that resulted in wasteful spending of taxpayer funds totaling \$42,000.

This investigation focused on the funding and procurement of the Crestwood Project, and improper disposal of District furniture. The SIG's report is not intended to address every individual complaint or issue conveyed to the SIG. The purpose of this report is to provide a road map for the District's leadership and its Board of Trustees (Board) to improve in its delivery of quality education to its students in a unified effort.

The SIG extends its appreciation to the acting superintendent, Dr. Anthonese Gamble, District staff, and the Board for their cooperation and intentionality of seeking solutions to the issues identified by the SIG. In addition, the SIG is appreciative of the collaboration with the South Carolina Department of Education, the Office of the State Engineer and Division of Procurement Services of the State Fiscal Accountability Authority.

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[Compilation of Findings and Recommendations](#)

[District and Board Response](#)

II. Background

A. Predicate

The South Carolina Office of the State Inspector General (SIG) initiated an investigation of the Sumter School District at the request of the South Carolina State Superintendent of Education pursuant to South Carolina (SC) Code of Laws, §1-6-35(A)(2). The [5/20/2025](#) request focused on the funding and procurement of the Crestwood High School athletic field construction and turf upgrades (Crestwood Project), and the alleged improper disposal of District inventory that potentially violated the state surplus property disposal process. The SIG notified the District Board of Trustees (Board) chairman and District superintendent of the initiation of the investigation by letter, dated [6/4/2025](#).

B. Scope and Objectives

The investigation focused on the District's financial management related to the approval and construction permitting process, and the funding and procurement of phase one of the Crestwood Project that was originally estimated to cost between \$3 million and \$3.5 million. The investigation covered activities and decisions that allegedly exceeded the District's cost estimates as presented to the Board. The investigation also examined the disposal of District surplus furniture allegedly in excellent condition and discarded in violation of state laws and procedures for the disposal of state surplus property.

C. Methodology

The SIG reviewed relevant documentation comprised of permits, licenses, reports, financial records, contracts, and other District records and policies maintained by the District. In addition, the SIG reviewed applicable state and federal laws, regulations, and policies.

The SIG conducted interviews of District staff, District Board members, members of the public, subject matter experts including the Division of Procurement Services of the State Fiscal Accountability Authority, the South Carolina Department of Education, and people who initiated confidential contact with the SIG.

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

D. Sumter School District

The District is a large, diverse public school system in Sumter, South Carolina, focused on providing a wide range of educational services and programs to support academic, career and personal development. The District served over 14,000 students in grades pre-kindergarten (Pre-K) through grade twelve in 25 schools comprised of fifteen elementary schools, seven middle schools, three high schools, and one alternative learning program. The District operated specialized facilities such as the Sumter Adult Education program, Sumter Career and Technology Center. The District received funding through state appropriations, federal government programs, and its local tax base.

At the onset of this investigation, Dr. William Wright served as the District's superintendent until his resignation on 8/14/2025. On 8/15/2025, Dr. Anthonese Gamble, the District's chief of schools, was appointed as acting superintendent.

E. Sumter School District Board of Trustees

The District is governed by nine elected members of the Board. The Board sets policy, approves the budget, works with the Sumter County legislative delegation and the Sumter County council, and oversees the operations of the District. At the time of this investigation, the Board was constituted as follows:

Board of Trustees	District
Brian Alston (Vice-Chair)	1
Brittany English	2
Ralph Canty, Sr., D. Min	3
Tarah Cousar-Johnson	4
Shawn T. Ragin, D. Min. (Chair)	5
Matthew McLeod	6
Dr. Gloria Rose Lee (Clerk)	7
Phil Leventis	8
Bonnie S. Disney Esq.	9
Deborah MacQueen (Shaw AFB Representative)	

The Board operated in accordance with the [SC Code of Laws, Title 59-Chapter 19 – School Trustees](#) as referenced in Board policy [BBA Board Powers and Duties](#).

III. Crestwood Project – Phase I

The Crestwood Project involved the comprehensive renovation and expansion of the high school’s athletic complex. The scope of work included a new football stadium, track, lighting, concessions, softball field drainage, and upgrades to existing infrastructure. The construction project focused on eliminating the need for off-campus football games, which were played at Hillcrest Middle School. District administration initially estimated the project to cost between \$3 million and \$3.5 million. Funding was secured primarily through District capital funds and bond issuances.

A. Board-Approved Funding

A senior District official provided the SIG with a summary [timeline](#) of the Crestwood Project’s funding sources from Board-approved allocations through 5/19/2025 for phase one of the project.

- [9/13/2021](#): District administration requested, and the Board approved an allocation of [\\$1,040,624.96](#) for the Crestwood Project from the full \$1,108,000 approved for district-wide athletic fields/tracks projects.
- [12/11/2023](#): District administration requested, and the Board approved an allocation of \$250,000 for the Crestwood Project.
- [5/6/2024](#): District administration requested, and the Board approved an allocation of \$1,600,000 for the Crestwood Project.
- 6/3/2024: The District administration utilized \$61,312 of “Other Facility Needs” account funds for the Crestwood Project.

- [6/24/2024](#): District administration requested and the Board approved a transfer of [\\$1,654,592](#) from the Carpeting Master Bond account to the Crestwood Project. The District administration request stated, “...**the board’s approval to transfer funds from 527 capital bond proceeds flooring projects in the amount of \$1,654,592 to the Crestwood Stadium project for full completion.**” [SIG emphasis]
- 9/26/2024: District administration utilized \$2,956.75 of “Other Facility Needs” account funds for the Crestwood Project.
- 1/8/2025: District administration utilized \$75,065.44 of “Other Facility Needs” account funds for the Crestwood Project.
- 1/30/2025: District administration utilized \$5,000 of “Other Facility Needs” account funds for the Crestwood Project.

The Board approved \$2,890,624.96 for the Crestwood Project prior to the initiation of phase one construction. One month after beginning construction the Board approved an additional \$1,654,592, which increased the total Board-approved allocations to \$4,545,216.96 for phase one of the project. However, the District reallocated \$144,334.19 from its “Other Facility Needs” account on four separation occasions to the Crestwood Project without Board approval. These unapproved reallocations were originally earmarked for other District-wide projects from the various bond sales.

B. Procurement Code and Governing Authority

The [SC Code of Laws, §11-35-5340](#) stated that school districts with annual budgets exceeding \$75 million (irrespective of the source of funds) are subject to the provisions of Chapter 35, Title 11, the *South Carolina Consolidated Procurement Code (CPC)*. Districts with a procurement code determined to be substantially similar to the CPC, in the written opinion of the South Carolina Division of Procurement Services (DPS) of the State Fiscal Accountability Authority (SFAA), are exempt from the provisions of the CPC.¹

By letter dated [6/7/2022](#), the District received a written opinion from the DPS that its [District procurement code and Board Exemptions](#) were substantially similar to the provisions of the [South Carolina Consolidated Procurement Code](#) as required by §11-35-5340 and [Regulation 19-445.3000](#) of the South Carolina Code of Laws and Regulations. The approved District procurement code became effective on 7/1/2022.

The South Carolina Department of Education’s (SCDE), [SCDE 2025 Office of School Facilities Policy and Procedures Manual](#) (OSF Manual) provides guidelines for school construction, planning, and facility management.² This manual, along with the [2025 South Carolina School Facilities Planning and Construction Guide](#) details state requirements and facility standards for building and maintaining safe and adequate learning environments for South Carolina school districts. The OSF Manual included the following statement:

Section 1.11 A: Procurement of professional design services, construction and goods and services is the responsibility of each district in accordance with their established procurement code. The OSF recognizes all procurement methods authorized and defined in SC Code [§11-35-2910](#) and [§11-35-3005](#).

¹ The DPS developed the [South Carolina Model School District Code](#) to aid school districts in adopting a code substantially similar to the CPC. The *Model Code* has been revised periodically following revisions to the CPC. The latest revision was effective 9/15/2021.

² [Office of School Facilities](#) (OSF) serves as the building official and implements and enforces the applicable building codes, regulatory, or statutory requirements.

C. Contractor Selection Process

District Selection Committee

The selection committee directed the District's efforts during the source selection process, which included the evaluation, scoring, and recommendation of the best contractor for the Crestwood Project. The District coordinated with staff from maintenance, operations, finance, procurement, and the District's superintendent to form a five-member selection committee. The committee determined that the most advantageous delivery method for the project was the design-bid-build method.³

On [1/5/2022](#), the District informed the Board that the design-bid-build method would be utilized in the construction of the Crestwood Project. Design-bid-build is the traditional project delivery method for construction procurements in South Carolina, including those within school districts. Guidelines for the design-bid-build method are presented in the [District procurement code](#), §2910(6), and §3015(2). The design-bid-build method utilized sequential contracts beginning with a qualifications-based selection process for architectural, engineering, or related design services, followed by competitive sealed bidding for construction based on the completed design. The District utilized two contractors for phase one of the Crestwood Project: Genesis Turf Inc. and Nu-Idea School Supply Company, Inc. (Nu-Idea).

Advertisement of Project

On [1/29/2024](#), the District published an advertisement in South Carolina Business Opportunities (SCBO) for services related to the Crestwood Project. The advertisement referred interested vendors to the District's website to obtain the full details and included the [Procurement Solicitation Document IFB #24-012](#). The purpose of the solicitation was to obtain bids "...for various improvements to the athletic fields for Crestwood High School...to correct existing drainage issues at the football and softball fields." A review of the District's [Bid Tally Sheet](#) determined there were "No Bids Received" for this solicitation.

On [4/15/2024](#), the District re-advertised the Crestwood Project in SCBO. The advertisement referred interested persons to the District's website to obtain the full details and included [IFB # 24-014 Crestwood High School Athletic Fields Upgrades](#). The solicitation described the general scope of work, which encompassed the football and softball field improvements. The solicitation included the option to bid on Alternate #1 (press box), and Alternate #2 (bleachers) for the football field. Subsequently, three addendums were issued:

- [Addendum 1](#) – issued on 4/30/2024 stated, "*Bid alternates #1 & #2 include a new press box on the home side as well as relocation of the existing home bleachers to the visitor's side and installation of a new home bleacher system. This bleacher work will involve new concrete pavement for the bleachers, press box and pedestrian circulation.*" The Addendum also added Alternate #3 for repair of the softball field drainage.
- [Addendum 2](#) – issued on 5/2/2024, requested materials, manufacturers and model types that met specific criteria of the basis of design products outlined in the bid documents.
- [Addendum 3](#) – issued on 5/6/2024, updated civil engineer plans for the softball back stop.

A review of the [Bid Tally Sheet](#) identified the District received two bids on 5/8/2024 from [Genesis Turf Inc.](#), and [Hellas](#) comprised of a Base bid, Alternate #1 bid (press box), Alternate #2 bid (bleachers), and Alternate #3 bid (softball field). On 5/13/2024, the District issued a [Written Determination letter](#) that stated in part:

³ [District procurement code](#) §2145(B)(4), District Determination, "*The Superintendent shall make a written determination. The determination shall describe the project delivery method (§3005), source selection method (§3015 and §1510).*"

“A solicitation for the Crestwood Athletic Fields Project was posted and advertised on April 15, 2024...Upon review of the responses, one vendor, Hellas was deemed unresponsive as their proposed turf product substitution did not meet the minimum requirements outlined in the solicitation. Genesis Turf met all requirements and had the lowest overall bid proposal, so it was determined that Genesis Turf be awarded the contract...”

Contract Award

On 5/24/2024, following the publication of an [Intent to Award](#), the District awarded a [contract](#) to Genesis Turf, Inc. in the amount of \$3,154,000 for the construction and turf upgrades to the football field at \$2,874,000 (Base Bid), and the repair of the softball field drainage at \$280,000 (Alternate #3 bid). Other related requirements in the contract included inspection and testing services, building/construction permits, change orders, substantial completion determination, final completion and approval from the OSF and Sumter City-County Planning Department.

The District exceeded its authority when it awarded the contract \$263,375.04 above the Board-approved allocation of \$2,890,624.96. The solicitation specified that “...Any award is subject to prior approval by the SSD Board.” The District provided no documentation setting forth the Board approved the contract award.

Bleachers and Press Box Construction

The District did not accept the Genesis Turf [bids](#) of \$720,000 for the installation and construction of bleachers and a press box due to the seven to eight month delivery timeframe set forth in the Genesis Turf bids. The District instead utilized a Cooperative Purchasing Agreement (CPA) issued in September 2021 by the Beaufort County School District to acquire the bleachers and press box. (See [SC Code of Laws, §11-35-4810](#))

The CPA, [RFP #22-006 Furniture and Furniture Consulting Services](#), sponsored the purchase of furniture and furniture consulting services with 40 school districts that included the District. Five entities were awarded this contract, which included Nu-Idea. On 6/12/2024, Nu-Idea submitted a proposal to the District for the bleachers and press box in the amount of \$1,589,592.

On 6/25/2024, the District issued a [purchase order](#) to Nu-Idea for \$1,589,592 for the installation of bleachers and a press box. Consequently, the District expended \$474,592 (+42.5%) more than the successful bids received from Genesis Turf in May 2024.⁴

The SIG reviewed the five offers awarded contracts to the CAP ([RFP #22-006](#)) and determined that **none** of the five offers **contained any specifications for bleacher seating or press box construction.** [SIG emphasis] Nu-Idea’s offer only included language in its proposal (pg. 36) that was similar to the RFP# 22-006 solicitation language for “Optional Services” (pg. 22), i.e., “...*outdoor furniture and athletic equipment [needs]...*,” which the District relied upon when it issued a purchase order to Nu-Idea for the construction and installation of the bleachers and press box.

Violation of the CPC and District Procurement Code

The District based its justification for contracting Nu-Idea at a higher cost on Genesis Turf’s timeline of seven to eight months for installation of the bleachers, an additional 1000 seats and a larger press box. The SIG determined that Nu-Idea did not bid on the specifications identified in the District’s two solicitations: IFB #24-012 and IFB #24-014. District procurement records indicated that only Genesis Turf made a qualified and

⁴ The Genesis Turf bids for Alternate bids #1 and #2 required an additional \$395,000 in concrete work that increased the Genesis Turf bids to \$1,115,000.

responsive offer to the original RFP scope of work and specifications, which included separate bids for the bleachers and the press box.

The SIG determined that school administration increased the seating capacity and press box dimensions after the IFB #24-014 bid closed. The District stated in a communication to the SIG “...changes which were requested by school administration ***after the bid process was complete.***” [SIG emphasis] The change in scope and specifications of IFB #24-014 after the bid closed required a new solicitation with the new specifications for the bleachers and the press box. As a result, the District violated SC Code of Laws, §11-35-2060 and the District procurement code.

The SIG brought this finding to the attention of District administration which acknowledged the error in not issuing a new solicitation with the expanded bleacher and press box specifications. The District advised that it has initiated improvements in its procurement processes to ensure future procurements conformed to the CPC and the District procurement code.

D. Crestwood Project Construction – Violations of State and County Laws

On [11/28/2023](#), the District initiated the process of obtaining the necessary construction permits with the Sumter City-County Planning Commission. The Sumter County Storm Water Utility issued Permit Number: 2-23-015, Notice of Intent for the Crestwood athletic field improvements.⁵

By letter, dated [12/7/2023](#), the Sumter City-County Planning Department provided a conditional approval for the District’s Minor Site Plan concerning the Crestwood Project improvements.

The SIG determined that the District violated the [SC Code of Laws, §59-23-210\(B\)](#) by advertising the project on [4/15/2024](#) for bids without an OSF permit. The SC Code of Laws, §59-23-210(B) reads as follows:

“All construction, improvement, and renovation of public school buildings and property on or after the effective date of this section must have plans and specifications submitted to the State Superintendent of Education or the superintendent's designee. Approval of the plans and specifications by the State Superintendent of Education or the superintendent's designee must be received before public bidding before the construction can begin. Plans and specifications must be coordinated with county officials such as traffic engineers and zoning administrators.”

On [4/18/2024](#), the Sumter City-County Planning Department provided a conditional approval for the District’s Minor Site Plan, **but never issued a land disturbance permit.** [SIG emphasis]⁶

The SIG determined the District violated [Article 1, Section P of the Sumter County Zoning and Development Standards Ordinance](#) when it initiated construction without the appropriate permits from the Sumter County. Article 1, Section P of the county ordinance states:

“Unless elsewhere exempted by this Ordinance, no building, sign, parking lot or other structure shall be erected, moved, added to, or structurally altered without a permit issued by the Zoning Administrator. Furthermore, no large-scale (greater than 2.0 acres) land clearance or grading of property shall be permitted without a tree protection and landscape plan submitted and approved by the Sumter City-County Planning Commission,

⁵ Prior to close-out of this project, and as a condition for approval of the storm water plan, the District was required to submit an as-built certification and have the site inspected by a certified storm water inspector until a Notice of Termination was approved.

⁶ Both the [12/7/2023](#) and [4/18/2024](#) letters noted: ***“This letter does not approve for construction to commence.”***

which shall then direct the Zoning Administrator concerning the issuance of grading or land clearance permit.”

On 6/10/2024, the District began phase one excavation and construction on the Crestwood Project. The District did not seek the required building permit from OSF in violation of [SC Code of Laws, §59-23-210](#). In addition, the District violated [SC Code of Laws, §59-23-220](#) with the utilization of the bleachers and turf before a certificate of approval was issued by OSF. (See [OSF email dated 11/18/2025](#))

On [5/22/2025](#), after phase one of the Crestwood Project was completed, District officials initiated contact with the OSF to discuss a building permit. An OSF official advised the District to create a construction project in the OSF submission portal. **The District’s outreach to OSF occurred two days after the SCDE requested that the SIG investigate the Crestwood Project. [SIG emphasis]**

On [5/23/2025](#), the District submitted construction drawings through the OSF portal. On 5/28/2025, the project was assigned to OSF reviewers. On 5/29/2025, OSF contacted the District to inquire about a press box referenced in the documents submitted.

Between 6/2/2025 and 6/4/2025, OSF contacted a third-party inspector and identified additional items added to the project, including moving bleachers and adding Americans with Disabilities (ADA) parking areas. The OSF’s third-party inspector declined an interview and failed to cooperate with the SIG’s investigation.

On [6/5/2025](#), OSF requested photos of the completed project. District officials advised OSF that students were already using the football field for practice, in violation of the [SC Code of Laws, 59-23-220](#) which stated:

“All construction, improvements, and renovation of public school buildings and property must be inspected by the State Superintendent of Education or the superintendent's designee for compliance with the applicable codes and standards. A certificate of approval must be obtained from the State Superintendent of Education or the superintendent's designee before a building may be occupied.”

Additionally, OSF requested and received the letter of substantial completion (estimated 90%) from the design professional, AIA Document G704-2017 Certificate of Substantial Completion, dated [2/19/2025](#). The design professional inspection on 2/7/2025 by Wood + Partners included 17 observations of outstanding issues. On [2/24/2025](#), Cypress Engineering issued a Civil Punchlist that included 15 observations of outstanding issues.

On [6/5/2025](#), OSF issued the District a school building permit for the Crestwood Project and a [letter of temporary authorization](#) that authorized the use of the athletic track and football field but **excluded the use of the stadium bleachers and press box [SIG emphasis]** because these were considered under construction. OSF advised the District officials to barricade ongoing work from potential student activities.

On 6/19/2025, the SIG conducted an impromptu stadium visit and observed that the guidelines outlined in OSF’s letter that provided the District temporary authorization were neglected. There were insufficient barriers surrounding the stadium’s bleachers as required in the [International Building Code \(IBC\) - Safeguards During Construction](#) (Chapter 33, §3306). Pedestrians were observed walking around, standing and sitting on the bleachers, posing a severe safety concern.

On [7/2/2025](#), OSF conducted a site visit to view the project under construction. OSF generated a report following the visit, which sited 30 discrepancies during the inspection that were in violation of the rules and regulations of the [OSF Planning and Construction Guide](#), and the [OSF Manual](#).

By letter dated [7/11/2025](#), the SIG informed the Board chairman and the District superintendent of the safety violation(s). The SIG conducted a subsequent stadium visit on 7/23/2025 and determined that the barriers around the bleachers were still insufficient based on the OSF guidelines.

On [8/7/2025](#), Bowman Consulting Group conducted impact testing of concrete for the home bleachers and deemed the concrete was acceptable.

On [8/19/2025](#) the OSF issued a certificate of occupancy for the stadium press box/athletic fields, which was based on required provisions for supplemental restroom facilities and hand-wash stations.

Detailed in Table 1 is a timeline of the permitting and construction of phase one of the Crestwood Project.

Table 1

Dates	Timeline of Permitting and Construction of the Crestwood Project
11/28/2023	District initiated the process of obtaining the necessary construction permits
12/7/2023	Sumter City-County Planning Department provided a conditional approval for the District’s Minor Site Plan
4/15/2024	District advertised the project on SCBO [SIG emphasis]
4/18/2024	Sumter City-County Planning Department provided a conditional approval – an official land disturbance permit was never issued [SIG emphasis]
5/24/2024	District issued contract to Genesis Turf, Inc. – date of commencement per §2.2 of the contract
5/28/2024	District held a pre-construction meeting
6/10/2024	Project excavation started without an OSF building permit [SIG emphasis]
2/6/2025	Dennis Corporation/Bowman Consulting Group (third-party inspector) observed new press box installation
2/19/2025	Wood + Partners issued a report of substantial completion (90%) that included 17 observations of outstanding issues
2/21/2025	Dennis Corporation/Bowman Consulting Group inspector 2 nd observance of new press box installation
2/24/2025	Cypress Engineering issued a Final Civil Punchlist that included 15 observations of outstanding issues
5/22/2025	District initiated contact with OSF for a building permit for the first time [SIG emphasis]
5/22/2025	Email from OSF instructed the District to submit the project for review
5/23/2025	District uploaded photos to OSF portal
5/29/2025	OSF contacted the District regarding the press box/requested drawings be uploaded to the portal
6/2/2025	OSF attempted to contact Bowman Consulting Group – third party inspectors (no contact made)
6/4/2025	OSF contacted Bowman Consulting Group – regarding additional items District added to the project – moving bleachers and adding ADA parking areas
6/4/2025	Bowman Consulting Group – conducted final inspection on the new bleachers and press box
6/5/2025	OSF held virtual a meeting with the District – requested photos of completed work
6/5/2025	OSF issued a letter of temporary authorization for use of the athletic track and football field/the stadium bleachers and press box were excluded [SIG emphasis]
6/19/2025	SIG conducted an impromptu stadium visit and observed there were insufficient barriers surrounding the stadium bleachers which neglected the OSF temporary authorization causing severe safety concerns and brought this to OSF’s attention
7/2/2025	OSF inspected the project and issued a report to the District that sited 30 discrepancies [SIG emphasis]
7/14/2025	SIG issued a letter of concern to the District superintendent and Board chairman regarding safety violations
7/23/2025	SIG conducted a follow-up stadium visit. Previous safety violations communicated to the District were not corrected
8/7/2025	Bowman Consulting Group conducted impact testing of concrete for the home bleachers and deemed the concrete was acceptable
8/19/2025	OSF issued a certificate of occupancy for the stadium press box/athletic fields, which was based on required provisions for supplemental restroom facilities and hand-wash stations [SIG emphasis]

E. Findings and Recommendations – Crestwood Project: Phase I

Finding Sec. III – 1: The District violated state law and local county ordinance by advertising and commencing construction without a building permit from the OSF, in violation of SC Code of Laws, §59-23-210 et seq. In doing so, the District exposed itself to wasteful expenditures and contractual liabilities. Furthermore, the District violated local county ordinance by commencing construction without a land disturbance permit from the Sumter County Planning Department.

Recommendation Sec. III – 1: The District should comply with the SC Code of Laws and Sumter County ordinances by obtaining the appropriate building permits prior to advertising and beginning construction activities. Additionally, the District should implement internal controls to comply with applicable statutes, ordinances, and regulations when conducting construction projects.

Finding Sec. III – 2: The SIG determined that the District violated the SC Code of Laws, §59-23-220 and the IBC by using the Crestwood football field and bleachers without OSF approval.

Recommendation Sec. III – 2: The District should comply with the SC Code of Laws and the IBC to ensure public safety, health, and welfare.

Finding Sec. III – 3: The District initiated the Crestwood Project and issued a construction contract without Board approval as required by the solicitation instructions which stated, “*Any award is subject to prior approval by the SSD Board.*” In addition, the District did not establish a Board-approved budget to serve as the baseline for the Crestwood Project, effectively circumventing the District procurement code. This failure violated District procurement code, §3070, which required Board approval for architectural, engineering, or construction changes that alter the project’s scope, intent, or exceed the approved budget.

Recommendation Sec. III – 3a: The District should comply with the solicitation requirements.

Recommendation Sec. III – 3b: The District should comply with its procurement code. The SIG recommends that the District and the Board mandate that no construction project may begin without a Board-approved “*Statement of Value*” and funding source before granting final approval and funding for a project. Furthermore, the District’s Board should conduct a comprehensive review of key financial information to ensure the proposal is financially justified, transparent, and aligned with organizational priorities. This review should include a detailed examination of the full cost structure—covering labor, materials, overhead, and contingencies.

Finding Sec. III – 4: The District violated SC Code of Laws, §11-35-2060 and District procurement code, §2060 when it issued a purchase order to Nu-Idea in the amount of \$1,589,592 for the construction of bleachers and a press box based on specifications that were modified after IFB #24-014 closed wherein a successful bidder was identified that would have saved the District and the Sumter School District taxpayers \$474,592. This modification of the bleachers and press box specifications required the issuance of a new solicitation with the new specifications.

Recommendation Sec. III – 4: The District should comply with the Consolidated Procurement Code and District procurement code, §2060 which states, “... *a contract modification may not alter a contract in a manner or degree inconsistent with the underlying purposes and policies of this code [CPC] or the regulations of the board.*” During the course of this investigation, the District acknowledged its mistake and that a new solicitation should have been issued with the new specifications. The District has since implemented processes to ensure future procurements adhere to the CPC and the District procurement code.

IV. Crestwood Project Expenditures

A. Analysis of the Crestwood Project Expenditures

A review of the District's financial records and documentation included purchase orders (P.O.), invoices, check documentation, and District vendor activity reports by vendor/voucher (open and paid vouchers) for phase one of the Crestwood Project. Below is a summary of the project costs that totaled \$5,803,293.65.

Preliminary Work: \$136,046.60

- Preliminary work for the Crestwood Project included underground utilities detection services, surveying, engagement of a design professional, a civil engineer and a third party OSF inspection consultant.

Awarded Contractor: Genesis Turf Inc. \$ 3,154,000.00

- The contract included a base cost of \$2,874,000.00 and \$280,000 (Alternate #3) for a total award of \$3,154,000.00. This cost included drainage for football and softball fields, irrigation for football and softball fields, football field's artificial turf installation and resurfacing of track area.

Genesis Turf Inc. Change Orders and Adjustment: \$363,640.00⁷

- Change Order # 1: Included the addition of a masonry brick backstop wall for the softball field with a French drain system at the base of the wall (\$128,000.00).
- Change Order #1 Adjustment: Backstop netting added to the softball field (\$52,235.00).⁸
- Change Order #2: Repair existing collapsed stormwater drainage pipe, necessary to tie into the new drainage system pipes (\$12,640.00).
- Change Order #3: Environmental consultant to investigate a sink hole discovered underneath the existing track during demolition and the contractor's remediation of the issue (\$47,265.00).⁹
- Change Order #4: Additional sidewalk work and handicap ramp for ADA compliance with egress to and from the stadium and bleachers; additional asphalt for the cul-de-sac at the end of the road to create better traffic flow (\$90,000.00).
- Change Order #5: Additional cement and asphalt work, connecting asphalt from track to road (\$33,500).

Awarded Contractor: Nu-Idea School Supply Company \$1,589,592.00

- Nu-Idea was awarded \$1,589,592.00 for the purchase and installation of new bleachers and a press box for the football field home side, and moving the existing home side bleachers to the visitor's side.

Additional Costs by Other Vendors: \$560,015.05

- New scoreboard and play clocks, painting of the existing restroom/concessions building, supplemental sanitary provisions, and miscellaneous electrical supplies.

A detailed listing of the District's expenditures on phase one of the Crestwood Project is listed in Table 2.

⁷ In accordance with the Genesis Turf contract §10.1, the District approved these change orders.

⁸ Due to miscommunication between the contractor and the architect the District was unaware the netting was installed. The contractor (Genesis) offered a \$30,000 discount, so the District allowed the netting to remain.

⁹ Included in this total is \$2,500 paid to GS2 Engineering & Environmental Consulting.

Table 2

Expenditures	Vender / Services	P.O. No.	P.O. Date	Expenditure Amount
Preliminary Work:				\$ 136,046.60
	Underground Detective Services	193678	4/6/2022	\$ 1,956.25
	Black River Land Surveying	204734	3/27/2023	\$ 2,875.00
	Underground Detective Services	207355	6/19/2023	\$ 2,695.00
	Underground Detective Services	210553	9/20/2023	\$ 2,767.50
	Cypress Engineering	Invoice	11/21/2023	\$ 26,472.55
	Cypress Engineering	212988	11/28/2023	\$ 15,370.00
	Cypress Engineering	215897	2/26/2024	\$ 27,400.57
	Cypress Engineering	215897	2/26/2024	\$ 2,175.75
	Wood + Partners, Inc.	215895	2/26/2024	\$ 49,900.00
	Wood + Partners, Inc.	220029	5/7/2024	\$ 4,433.98
Construction Contracts and Change Orders/Adjustment:				\$ 3,517,640.00
Contract Awarded	Genesis Turf, Inc. football and softball fields	220298	5/30/2024	\$ 3,154,000.00
Change Order #1	Genesis Turf, Inc. softball backstop wall	220362	6/5/2024	\$ 128,000.00
Change Order #2	Genesis Turf, Inc. repair storm drain	222171	8/26/2024	\$ 12,640.00
Change Order #3	GS2 Engineering & Environmental Consulting	222173	8/26/2024	\$ 2,500.00
	Genesis Turf, Inc. sinkhole repair (track)	223775	9/26/2024	\$ 44,765.00
Change Order #4	Genesis Turf, Inc. add'l concrete work	227341	1/13/2025	\$ 90,000.00
Change Order #5	Genesis Turf, Inc. connect track to road	231838	4/23/2025	\$ 33,500.00
Change Order #1 Adjustment	Genesis Turf, Inc. softball backstop netting	Determination	5/13/2025	\$ 52,235.00
Purchase Order Issued	Nu-Idea School Supply Co. bleachers & press box	220555	6/25/2024	\$ 1,589,592.00
Additional Costs by Other Vendors:				\$ 560,015.05
	Signs Unlimited – Scoreboard	220313	6/3/2024	\$ 251,312.00
	Signs Unlimited - Play Clocks	222327	8/28/2024	\$ 8,051.75
	City Electric Co. - misc. electrical	223879	10/1/2024	\$ 84.19
	Dennis Corporation – third party inspection	224331	10/9/2024	\$ 1,855.00
	Bowman Consulting Group Ltd.	224331	10/9/2024	\$ 2,965.00
	BSN Sports Inc	224291	10/23/2024	\$ 4,479.44
	City Electric Co. - misc. electrical	227743	1/31/2025	\$ 2,092.75
	City Electric Co. - misc. electrical	227852	2/3/2025	\$ 764.26
	City Electric Co. - misc. electrical	227947	2/5/2025	\$ 424.67
	City Electric Co. - misc. electrical	228033	2/6/2025	\$ 807.32
	City Electric Co. - misc. electrical	228247	2/11/2025	\$ 220.10
	Triple T Electric Inc.	230149	3/18/2025	\$ 4,500.00
	TruBlue Services – painting	230160	3/19/2025	\$ 10,450.00
	Jackson & Sims – design services	Invoice	6/18/2025	\$ 68,011.13
	FW Architects, Inc.	233413	6/18/2025	\$ 18,000.00

	Grainger	233396	6/18/2025	\$ 698.03
	3D DirtWorks, LLC	233573	7/15/2025	\$ 37,500.00
	Brewer's Septic and Grading LLC	233934	7/25/2025	\$ 7,900.00
	3D DirtWorks, LLC (<i>emergency procurement</i>)	234056	7/25/2025	\$ 28,000.00
	Triple T Electric Inc. (<i>emergency procurement</i>)	234057	7/25/2025	\$ 24,800.00
	Triple T Electric Inc.	234047	7/25/2025	\$ 4,883.06
	BSN Sports Inc	234061	7/30/2025	\$ 16,867.44
	Scott Equipment and Surfacing	234528	8/11/2025	\$ 21,000.00
	Southern Fence Company	234791	8/18/2025	\$ 850.00
	Southern Fence Company	236369	9/19/2025	\$ 1,850.00
	Southern Fence Company	236370	9/19/2025	\$ 2,375.00
	Restroom Trailer Solutions	Various		\$ 39,273.91
Total Project Expenditures 7/1/2021 through 9/19/2025				\$ 5,803,293.65

B. Unauthorized Procurements and Invalid Ratifications

A review of the District's procurement records for the Crestwood Project identified the following exceptions:

- On [11/28/2023](#), the District executed an unauthorized procurement in the amount of \$26,472.55, for Cypress Engineering with a request for ratification, dated 11/28/2023. Per the District procurement code, this ratification was invalid because it lacked the essential elements required for a valid ratification, i.e., vendor information, contract amount, P.O. number, detail facts, circumstances of the improper act, and the decision to continue or terminate the contract. The District failed to document the actions taken against the individual who executed the unauthorized procurement. These facts were pertinent to support the District's determination that the ratification was in the best interest of the state (District).
- On [6/23/2025](#) the District executed an unauthorized procurement in the amount of \$68,011.13 to Jackson & Sims Architects with a request for ratification, dated [6/23/2025](#). As set forth previously, this ratification was invalid for the same reasons and lack of documentation.

The same District employee was responsible for both of the unauthorized procurements on [11/28/2023](#) and [6/23/2025](#) that totaled \$94,483.68, and the invalid ratifications. No disciplinary action was taken against the employee, and no corrective action was implemented for the District employee for either procurement.

- The SIG determined that the District incurred [\\$39,273.91](#) in expenses for rental of supplemental sanitary provisions to comply with OSF requirements ([OSF letter of temporary authorization](#)) outlined in ICC A117.1 and Chapter 29 (Plumbing Systems) of the South Carolina Building Code. The District's failure to obtain OSF permitting in 2024, as required by state law, resulted in the District's expenditure of funds for portable toilet facilities and hand-wash stations for four home games during the 2025 season.
- On [7/14/2025](#), the District executed an emergency procurement with 3D DirtWorks, LLC to secure a certificate of occupancy for the Crestwood Project as a result of ongoing project mismanagement. Following a failed final inspection regarding egress requirements, the District bypassed lower-cost options due to self-imposed time constraints related to the season's opening

[football] game at a cost of \$28,000.00. In addition, the District failed to obtain quotes for this procurement which exceeded \$25,000 in violation of [District procurement code](#), §1550(2)(b).

- On [7/25/2025](#), the District executed a second emergency procurement with Triple T Electric Inc. in the amount of \$24,800.00 to address critical electrical requirements driven by the OSF inspection prior to the season’s opening football game.

C. Summary of Crestwood Project Expenditures

The District expended \$5,803,293.65 on phase one of the Crestwood Project. As a result, the District exceeded its spending authority of the Board-approved allocations of \$4,545,216.96 by \$1,258,076.69 (+27.7%). The excessive spending included unauthorized procurements, invalid ratifications, and “emergency” procurements that the SIG determined did not meet the standards or requirements contained in the CPC or the District procurement code.

The District violated state law when it failed to submit the Crestwood Project proposal for OSF permitting prior to the onset of the construction. The District’s explanation of an “opening [football] game” as justification for an emergency procurement is not contained within the CPC or the District procurement code as a valid reason for an emergency procurement. [SIG emphasis]

The District’s failure to follow fiscal policies and regulations designed to protect the District against inaccurate accounting and reporting resulted in numerous deficiencies and weaknesses in internal control, governance and oversight by the District. These deficiencies and weaknesses unnecessarily elevated the risk of fraud over the expenditure of Board-approved funds for the construction of the Crestwood Project.

Among the concerns identified were the District’s lack of adherence to its procurement code, deficient contract management, and insufficient documentation for vendor payments. Set forth in Table 3 are the exceptions totaling \$5,293,789.59 that represent significant deficiencies and material weaknesses in the District’s failure to govern and provide fiscal oversight of Board-approved funding.

Table 3

Exceptions	Amount
Unauthorized or improper procurements ¹⁰	\$5,107,232.00
Unauthorized procurements	\$ 94,483.68
Sanitary provisions rentals	\$ 39,273.91
Emergency procurement & lacked competitive quotes	\$ 28,000.00
Emergency procurement	\$ 24,800.00
Total	\$5,293,789.59

D. Findings and Recommendations – Crestwood Project Expenditures

Finding Sec. IV – 1: The District’s lack of adherence to its procurement code, deficient contract management, and insufficient documentation for vendor payments totaled \$5,293,789.59 in unauthorized procurements and invalid ratifications for phase one of the Crestwood Project in direct violation of the [SC Code of Regulations, §19-445.2015](#) “Unauthorized or Illegal Procurements” as set forth in Table 3 of this report. These failures represent significant deficiencies and material weaknesses in the District’s ability to govern and provide fiscal oversight of its appropriated funds.

¹⁰ Contract to Genesis Turf with change orders (\$3,517,640) and purchase order to Nu-Idea (\$1,589,592).

Recommendation Sec. IV – 1a: The District should implement stricter internal controls reinforcing policies and procedures to prevent the processing of “*Unauthorized or Illegal Procurements.*” All unauthorized procurements should be reported directly to the Superintendent for review and approval, and included in the quarterly reports submitted to the Board.

Recommendation Sec. IV – 1b: The District should provide annual training to all finance, procurement, and non-procurement staff who request goods/services on procurement policies and procedures and document this training to each employee’s personnel file.

Recommendation Sec. IV – 1c: The District should adopt the "[Unauthorized or Illegal Procurement form](#)” provided by the Office of State Procurement, DPS, and ensure that when an unauthorized procurement occurs, a standard corrective action is to require all “*end users*” to complete training within 60 days of the discovery.

Finding Sec. IV – 2: The District failed to obtain three quotes for the procurement of services from 3D DirtWorks, LLC as required by the District procurement code, §1550(2)(b).

Recommendation Sec. IV – 2: The District should follow the District procurement code, §1550(2)(b), which requires written quotes from a minimum of three qualified sources.

V. Surplus Property Disposal

A. State Surplus Property Guidelines

During the period of June 2024 through August 2024, the District was scheduled to receive replacement furniture for all 29 schools through the Elementary and Secondary School Emergency Relief fund. The District consulted the South Carolina Department of Administration (SCDOA) State Surplus Property Office [for advice](#) regarding disposal of the surplus furniture. The SCDOA reviewed the District’s documentation of surplus property and determined the SCDOA did not have the authority to decide the final disposition of the surplus furniture due to the furniture being county property. (See Table 4 below)

Table 4

Property Description	Quantity
Student Desks	14,000
Cafeteria Tables	535
Administrative Desks	125
Task Chairs	125
Total	14,785

Per [District procurement code](#), §2150 H, the chief business official has the sole discretion to deem the items “*junk.*” The SCDOA further recommended the District review the matter with the superintendent as well as district and county policies as noted in the [5/20/2024](#) and [4/24/2025](#) emails. The District subsequently offered the furniture to [other school districts](#) for sale.

B. Disposal and Storage of Surplus Furniture

The District’s executive director of operations deemed the furniture as “*junk*” in violation of the District procurement code that only the chief business official can declare District inventory as “*junk.*” As a result, other educational entities could not repurpose the furniture. This reflected negligence by a District senior

official and constituted an “*unauthorized disposal*” per [District procurement code](#), §2150 I.¹¹ Photos of a dumpster over-filled with District furniture were provided to the SIG, as seen below.



C. Storage of Surplus Furniture

Excess furniture was moved to a rented warehouse storage facility to make room for the new furniture. No documentation was provided by the District relating to the procurement process for the warehouse storage facility except for the initial six-month rental agreement. Subsequently, the District provided vendor payment reports for the period of 7/18/2024 - 12/3/2025. The SIG determined the District rented the warehouse from Hodge Distribution and Logistics at a rate of \$2,000.00 per month, totaling [\\$42,000](#).

D. Sale of Surplus Furniture and Recordkeeping

The District conducted warehouse sales of the surplus property on 11/7/2024 (Thursday) and 11/9/2024 (Saturday), rather than reallocating the surplus property to eligible recipients, such as governmental bodies, political subdivisions, and nonprofit health and educational institutions. The total revenue generated from the sale of items was [\\$550](#).

The District failed to adhere to [District procurement code](#), §2150 D [Public Sale of Surplus Property] when only one of the two sales was advertised. (See [Advertisement Order and Invoice](#)) Additionally, the District violated [District procurement code](#), §2150(D)(1) when the sales were opened to both eligible recipients (donees) and the general public simultaneously. (See emails dated [10/14/2024](#) and [10/14/2024](#))

The SIG determined the District incurred a net loss of \$41,668 of taxpayer dollars after factoring in storage expenses (\$42,000) and advertisement of the sale (\$218). As indicated by the [receipts](#) provided by the District it is unknown how many items were sold or at what price.¹²

The District’s failure to comply with its own procurement code, established policies and procedures, and lack of documentation has the potential to further erode public trust.

E. Summary of Surplus Property Disposal

The SIG determined the District was not required to follow state surplus property disposal guidelines based upon a determination made by the SCDOA that the surplus District property was Sumter County property and not state property.

¹¹ The ratification of unauthorized and/or improper disposal of District property rests with the superintendent. The superintendent must prepare a written determination that describes the facts and circumstances, the corrective action taken to prevent recurrence, and action taken against the individual who committed the act, along with a report to the Board.

¹² [District procurement code](#), §2150(C)(2), “*The sale price for all items will be established by the chief procurement officer or the chief procurement officer's designee...Miscellaneous items with an acquisition cost of \$5,000 or less such as office furniture and machines, shop equipment, cafeteria equipment, etc.: A sale price will be assessed based on current market conditions.*”

However, senior District officials failed to comply with its [District procurement code](#) in the disposal of surplus property. As a result, the District incurred \$42,000 in unnecessary expenditures and adversely impacted other schools within the community and outside the District, which had requested assistance, but were denied this assistance due to the actions of senior District official(s) presiding over the disposal of the surplus property.

F. Findings and Recommendations – Surplus Property Disposal

Finding Sec. V – 1: The District did not follow applicable procedures when conducting surplus property sales, which was in violation of [District procurement code](#), §2150(C).

Recommendation Sec. V – 1: The District should follow applicable laws, policies, and procedures when conducting sales of the District’s property.

Finding Sec. Sec. V – 2: The District failed to follow [District procurement code](#), §2150 C(2), which stated: *“the sale price of items will be established by the Chief Procurement Officer or the Chief Procurement Officer’s designee.”* By allowing the executive director of operations to set the pricing, the chief procurement officer, chief business official, and procurement coordinator were excluded from the process as financial and procurement subject matter experts.

Recommendation Sec. V – 2: The District should implement strict internal controls to reinforce the District procurement code and applicable state and federal laws and/or regulations.

Finding Sec. V – 3: During the period of 7/18/2024 through 12/3/2025, the District paid Hodge Distribution and Logistics \$42,000 without a solicitation as required by the District procurement code for the leasing of the warehouse storage facility.

Recommendation Sec. V – 3: The District should adhere to its procurement code for proper solicitation of the leasing services. Following the procurement code will result in decreased wasteful spending of taxpayer funds by the District.

Finding Sec. V – 4: The District did not follow the District procurement code while advertising, documenting, or retaining records related to the sale of surplus furniture.

Recommendation Sec. V – 4: The District should adhere to its procurement code to ensure compliance with the disposal of the District’s surplus property.

VI. Other Violations of State Law and Observations

During the Crestwood Project investigation, the SIG identified additional construction projects that failed to secure OSF approval and permitting in violation of state law.

A. Mayewood Middle School Project

The Mayewood Middle School New Toilet/Concession building was constructed without plumbing or electrical infrastructure, which was later installed by District employees. The [IFB #24 015](#) for the Mayewood Concession building, issued on 4/29/2024, was awarded to [Hardee Construction Company](#) on 5/29/2024 for \$233,000. The project was completed on 1/23/2025, with total expenditures reported as \$285,239.61.

The SIG determined the [OSF had no record](#) of the construction project or issued any permits or approvals concerning modifications to the District’s property of Mayewood Middle School located at 4300 E Brewington Rd, Sumter, SC 29153 within the last five years. Furthermore, the District’s executive director of operations stated, *“No formal facilities inspection report or written documentation for the Mayewood facility has been*

issued or provided” to ensure the Mayewood facility met health, fire, and structural safety codes, protecting students, staff, and visitors.

B. Sumter High School and High Hills Elementary School Projects

The SIG identified further instances of mismanagement by the District regarding [RFP #24-026](#), the gym flooring replacements for Sumter High School and High Hills Elementary School. Although both contracts were awarded to Scott Equipment and Surfacing, the District failed to report the projects to the OSF, which violated state law. The SIG confirmed with the OSF that no records of these construction activities existed for either the Sumter High located at 2580 McCrays Mill Rd, Sumter, SC 29154 and High Hills Elementary School located at 4971 Frierson Rd, Shaw AFB, SC 29152.

C. Violation of Board Policies BDG and BDG-R

The District retained an immigration attorney, “BENME LEGAL DORAL FL” paying \$6,500.00 for legal services in violation of [Board policies BDG and BDG-R](#). A search of public attorneys did not return any results of attorneys working for “BENME LEGAL” licensed to practice law within the State of South Carolina as required by Board Policy BDG-R. Additionally, the District did not provide a compensation agreement between the Board and the attorney as required by Board Policy BDG-R.

D. Findings and Recommendations – Other Violations of State Law and Observations

Finding Sec. VI-1: The District failed to obtain OSF approval of construction projects at the Mayewood Middle School, Sumter High School and High Hills Elementary School in violation of [SC Code of Laws, §59-23-210](#).

Recommendation Sec. VI-1: The District should comply with the SC Code of Laws and Sumter County ordinances by obtaining the appropriate building permits prior to advertising and beginning construction activities. Additionally, the District should implement internal controls to comply with applicable statutes, ordinances, and regulations when conducting construction projects.

Finding Sec. VI – 2: The District retained an attorney who lacked a license to practice law in South Carolina and failed to provide a compensation agreement between the Board and the attorney that violated Board policies BDG and BDG-R.

Recommendation Sec. VI – 2: The Board should ensure the District superintendent adheres to Board policies BDG and BDG-R.

VII. Conclusion

The SIG determined that the District failed in its management of the Crestwood Project that resulted in excessive spending of taxpayer funds, unauthorized procurements and violations of the South Carolina Consolidated Procurement Code and the District procurement code. Additionally, the District initiated the Crestwood Project and issued a construction contract without Board approval as required by the solicitation instructions which stated, “*Any award is subject to prior approval by the SSD Board.*”

The District violated state law and local county ordinance by advertising and commencing construction without a building permit from the SCDE, OSF. In doing so, the District exposed itself to wasteful expenditures, contractual liabilities and risked public safety, health, and welfare.

The District exhibited failures in fiscal practices and contract management in violation of its own procurement code and constructed a facility without the appropriate building permits in violation of state law. Among these failures were material weaknesses, lax internal controls, cost overruns and allowing public access to the

facilities without a certificate of occupancy. As a result, the District exceeded Board-approved funding for phase one of the Crestwood Project by \$1,258,076.69.

Despite concerns raised by Board members, a majority of the Board voted to approve millions of dollars in capital bond funding for the Crestwood Project based solely on estimates provided by District administration rather than an established, Board-approved budget supported by actual quotes. As project costs escalated, the District attempted to offset the project's escalating costs by reallocating proceeds from the Carpeting Master Bond account and supplemented with funds from the "Other Facility Needs" account. Subsequently, the Board approved a motion during its 10/6/2025 Board meeting that **"no work shall commence on any project until an official bid has been received, reviewed, and formally approved by the Board of Trustees."** [SIG emphasis]

The SIG identified several areas of concern as detailed in the Findings and Recommendations sections of this report. The SIG did not identify criminal activity or indication of fraudulent activity during this investigation.

The SIG extends its appreciation to the acting superintendent, Dr. Anthonese Gamble, District staff, and members of the Board for their cooperation and intentionality of seeking solutions to the issues identified by the SIG. In addition, the SIG is appreciative of the collaboration with the South Carolina Department of Education, the Office of the State Engineer and Division of Procurement Services of the State Fiscal Accountability Authority, and persons who initiated confidential contact with the SIG.