



APPLICATION FOR APPEAL OF ANY ORDER, REQUIREMENT, OR DECISION
\$50 FEE

Name of Appellant: Tracy and Sunshine Gantt Ministries, doing business as Pickens County Shelter of Hope

If Appeal relates to a specific property, provide the following information:

Address: 404 Hampton Ave, Pickens, SC 29671

Use: Multi-service community resource hub

Nature of the Appeal: (Please submit any information pertaining to this decision and appeal) _____

Appeal of the June 17, 2026 determination of the City of Pickens Zoning Administrator concerning the proposed use of the property located at 404 Hampton Avenue, Pickens, South Carolina 29671. Please see attached Supplement with additional information.

Date of Order Requirement or Decision or Notice of Violation being appealed: June 17, 2026

PRINT NAME: Miles E. Coleman, Esq. Attorney for Tracy and Sunshine Gantt Ministries

SIGNATURE: Miles Coleman

ADDRESS: Nelson Mullins Riley and Scarborough, LLP, 2 W. Washington St., Ste 400, Greenville SC, 29601

PHONE NUMBER: [REDACTED] EMAIL: miles.coleman@nelsonmullins.com

Office Use Only

Date Appeal Received: 7/29/26 Email

Date of Original Decision: 6/17/26

BZA/BAR Meeting: Aug 27th 2026

BZA/BAR Decision _____

SUPPLEMENTAL ATTACHMENT

Tracy and Sunshine Gantt Ministries, doing business as Pickens County Shelter of Hope (“**Appellant**” or the “**Ministry**”), appeals the June 17, 2026 determination of the City of Pickens Zoning Administrator concerning the proposed use of the property located at 404 Hampton Avenue, Pickens, South Carolina 29671 (the “**Property**”). In support of this appeal, Appellant states the following.

I. Decision Appealed

On June 5, 2026, Appellant submitted an application for a Certificate of Zoning Compliance for the Property. The application identifies the Property as Tax Map Parcel No. 4181-16-92-2817, the property owner as SCF RC Funding IV LLC, and the zoning district as the General Business District (“**GBD**”). The application further states that Appellant entered into a commercial lease for the Property in April 2026. Application for Certificate of Zoning Compliance dated June 5, 2026, at 1, 3 (attached as Exhibit A).

Appellant proposed to use the Property as a multi-service community resource hub and emergency-to-transitional housing center. The proposed operation includes: (a) outpatient medical and clinical consultations in the building’s existing nurse’s office; (b) workforce development, computer access, and job-placement services in an existing conference room; (c) administrative and co-working space for nonprofit and community partners; and (d) shared emergency and transitional residential accommodations. Exhibit A at 1–3.

On June 17, 2026, the Zoning Administrator issued a written determination approving the medical or clinical component as a conditional use, approving the workforce and job-placement component as a business-center use, and approving the administrative co-working component as a general-office use. Zoning Administrator Determination dated June 17, 2026, at 1–2 (attached as Exhibit B).

The Zoning Administrator denied the residential component. Although the determination acknowledges that “group housing” is an authorized conditional use in the GBD through the Zoning Ordinance’s incorporated-use provisions, it concludes that Appellant’s residential program constitutes a different, unlisted use called “transitional lodging” or “homeless housing.” Exhibit B at 2–4.

The determination states that the City’s Zoning Ordinance does not mention homeless housing, homeless shelters, or transitional lodging in any zoning district and reasons that, because the City’s zoning system is permissive, Appellant’s residential use is prohibited throughout the City. Exhibit B at 3–4.

The determination expressly identifies itself as the Zoning Administrator’s interpretation of the Zoning Ordinance and advises Appellant of its right to appeal to this Board within 30 days. Exhibit B at 4.

II. Jurisdiction, Standing, and Timeliness

The Board has authority “to hear and decide appeals where it is alleged there is error in an order, requirement, decision, or determination made by an administrative official in the enforcement of the zoning ordinance.” S.C. Code Ann. § 6-29-800(A)(1).

Appellant is a “person aggrieved” within the meaning of S.C. Code Ann. § 6-29-800(B). Appellant submitted the application, claims a leasehold interest in the Property, and is directly prevented by the challenged determination from conducting the proposed residential component of its operation. Exhibit A at 1, 3; Exhibit B at 1–4.

This appeal is timely because it is filed within the 30-day period stated in the June 17 determination. Exhibit B at 4. Section 6-29-800(B) likewise provides a 30-day appeal period from actual notice when no other time is prescribed and requires the notice of appeal to specify the grounds asserted.

In deciding this appeal, the Board may reverse, affirm, or modify the Zoning Administrator’s determination. The Board possesses the powers of the official whose decision is appealed and may issue or direct the issuance of a permit. S.C. Code Ann. § 6-29-800(E).

Appellant requests that the Zoning Administrator transmit to the Board all papers constituting the administrative record, including the complete application, internal staff communications, notes, ordinance provisions reviewed, historical zoning and occupancy records for the Property, and all other materials upon which the determination was based. S.C. Code Ann. § 6-29-800(B).

Appellant reserves the right to supplement the evidentiary record and legal authorities supporting the grounds stated in this appeal before or at the hearing, including through sworn declarations, historical zoning records, floor plans, operational materials, and records concerning comparable uses.

III. Factual Background

1. The Property is an existing institutional residential facility.

The application describes the Property as an existing 2.90-acre parcel improved by a freestanding, approximately 32,181-square-foot masonry and stone building constructed in 1978. Exhibit A at 5.

According to the application, the building remains configured in its longstanding institutional residential and administrative floor plan. Its preexisting facilities include shared residential areas, corridors, emergency exits, a nurse’s office, conference space, administrative cubicles, and other infrastructure designed for residential care and community-service occupancy. Exhibit A at 2, 5.

The application states that the prior operator used the Property as an institutional residential-care facility with an approved occupancy capacity of 55 individuals. The proposed facility presently contains 52 permanent beds. Exhibit A at 2–3, 5.

Appellant does not propose to enlarge the building or materially alter its institutional residential configuration. The application states that the building's exterior footprint, roofline, emergency exits, fire-egress corridors, doors, interior corridors, and exterior walkways will remain unchanged. Exhibit A at 2, 5.

The application further states that existing water, sewer, and electrical connections remain active; the existing paved and demarcated parking area requires no expansion or reconfiguration; and the work undertaken by Appellant has been limited to property maintenance and cosmetic renovation, including cleaning, painting, minor drywall and flooring work, and roof weatherproofing. Exhibit A at 2, 5–6.

The prior operator reportedly ceased active operations in 2024, but the application states that the Property has not been physically converted away from its institutional residential configuration. Exhibit A at 2.

These statements concerning the prior operation and its approval should be confirmed through the City's historical records. Appellant specifically requests production and consideration of all prior Certificates of Zoning Compliance, conditional-use approvals, certificates of occupancy, building and fire records, business licenses, plans, correspondence, and other records reflecting the former operation and its zoning classification.

2. The proposed residential component is a shared institutional residence.

The application proposes 52 permanent beds for individuals participating in Appellant's emergency-to-transitional housing program. Exhibit A at 2–3, 5.

Residents will live within the existing institutional building and share living accommodations. They will not occupy separate apartments or separate dwelling units. That description follows from the application's identification of 52 beds within the preexisting institutional residential layout, rather than independent dwelling units. Exhibit A at 2–3, 5.

The residential component is integrated with the approved clinical, workforce-development, employment, administrative, and community-support components. Exhibit A at 1–3.

Appellant does not contend that residents will be lodged overnight as patients of the separately approved outpatient clinic. The residents will occupy the building through the residential component and may separately receive outpatient consultations or referrals through the clinical component, consistent with the limitation identified in the June 17 determination. Exhibit A at 1–3; Exhibit B at 1.

IV. Grounds for Reversal

1. The proposed residential component falls within the Zoning Ordinance's express definition of "group housing."

The Zoning Administrator's determination acknowledges the following chain of ordinance provisions:

- a. Section 408.2(A) permits in the GBD uses permitted in the CBD and NBD, together with the conditions attached to those uses;
- b. Section 407.3(A) incorporates specified conditional uses into the NBD;
- c. Section 405.3(A) incorporates the conditional uses permitted in the RM-8 district into the RM-16 district; and
- d. Section 404.3(B) authorizes "group housing," subject to applicable state requirements and required county approvals.

City of Pickens Zoning Ordinance §§ 408.2(A), 407.3(A), 405.3(A), 404.3(B), as quoted in Exhibit B at 2–3.

The City therefore does not dispute that group housing is an authorized conditional use in the GBD. Exhibit B at 2–3.

The Zoning Ordinance defines group housing as follows:

"A building or structure used as a place of residence by several persons who share the living accommodations and do not occupy separate dwelling units. The following are considered group quarters: institutions, dormitories, rooming and boarding houses, and similar establishments."

City of Pickens Zoning Ordinance art. XIV, § 1401, quoted in Exhibit B at 3.

The Appellant's proposed operation on the Property satisfies the elements of the "group housing" definition. The specific elements of Appellant's proposed operation that meet the "group housing" definition are as follows:

- a. the operation will occur in a single existing building;
- b. the building will be used as a place of residence;
- c. several persons will reside there;
- d. those persons will share living accommodations;
- e. the residents will not occupy separate dwelling units; and
- f. the building is institutional in configuration and operation.

Exhibit A at 1–3, 5.

The definition does not exclude persons who are homeless, persons receiving emergency assistance, persons participating in a transitional program, persons receiving supportive services, or persons whose anticipated period of residence may vary. City of Pickens Zoning Ordinance art. XIV, § 1401, quoted in Exhibit B at 3.

The definition likewise does not restrict group housing to residences for children, persons with disabilities, or any other particular population. Instead, it defines the use according to the physical and functional manner in which the occupants reside. *Id.*

The proposed residential component falls within the ordinary and enacted meaning of “group housing,” and therefore is not an unlisted use. It is an authorized conditional use subject to the conditions the City Council has enacted.

2. The Zoning Administrator improperly created an undefined “transitional lodging” classification and treated that label as dispositive.

The June 17 determination calls the residential component “transitional lodging.” The June 17 determination does not identify “transitional lodging” as a defined term in the Zoning Ordinance, quote an ordinance definition for that phrase, or identify any enacted provision stating that transitional housing is excluded from group housing. Exhibit B at 2–4. The proposed operation must be classified according to its actual physical and functional characteristics under the Zoning Ordinance. The use of the term “transitional lodging” by the City or in any other documentation does not permit that undefined term to substitute for application of the zoning categories enacted in the Zoning Ordinance.

The City uses circular reasoning by assigning Appellant an undefined label and then concluding that the use is prohibited without completing the required comparison to the defined category that describes the actual operation.

South Carolina courts give ordinance language its plain and ordinary meaning and do not employ a forced construction that limits or expands an ordinance beyond its text. Zoning restrictions are strictly construed because they restrict the common-law use of private property and should not be impliedly extended to circumstances not clearly within their scope. *City of Myrtle Beach v. Juel P. Corp.*, 344 S.C. 43, 47–49 (2001).

The June 17 determination effectively adds the exclusion to Article XIV that group housing does not include housing occupied by persons who are homeless or participating in emergency or transitional programs. No such exclusion appears in the language quoted by the City. Exhibit B at 3.

South Carolina’s zoning-enabling statute provides that conditions, restrictions, and limitations imposed on conditional uses must be stated in the text of the zoning ordinance. S.C. Code Ann. § 6-29-720(C)(6). It also requires regulations to be uniform for each class or kind of use throughout a district. S.C. Code Ann. § 6-29-720(B).

The City may require Appellant to satisfy conditions that the ordinance actually imposes on group housing, including applicable state requirements and identified county approvals. It may not impose an additional categorical restriction based on the residents’ housing status when the enacted definition contains no such restriction.

3. The City's reliance on South Carolina Code § 6-29-770 does not narrow the City's separate definition of "group housing."

The determination relies on S.C. Code Ann. § 6-29-770 to suggest that "group homes" ordinarily concern specific populations, such as persons with mental or physical disabilities. Exhibit B at 2–3.

Section 6-29-770 does not purport to define all "group homes" or all "group housing." Subsection (E) creates a narrow zoning protection for a home serving nine or fewer mentally or physically handicapped persons, providing care on a 24-hour basis, and approved, licensed, or operated under contract with a state agency. A qualifying residence must be construed as a natural family or similar zoning category. S.C. Code Ann. § 6-29-770(E).

That statutory protection does not state that only those small disability-related residences may constitute group housing under a municipal ordinance. It does not amend the City's definition, prohibit a municipality from defining group housing more broadly, or make resident population the controlling feature of every group-housing classification.

Appellant does not seek the special natural-family treatment provided by § 6-29-770(E). Appellant seeks application of the City's separately enacted group-housing definition.

4. The state housing-trust-fund definition of "homeless housing" does not create an exclusive zoning category.

The determination also relies on a state statutory definition of "homeless housing." It attributes that definition to S.C. Code Ann. § 31-22-10, although the definition appears in § 31-22-20(2). Exhibit B at 3.

Chapter 22 of Title 31 is the William C. Mescher Local Housing Trust Fund Enabling Act. Its stated purpose is to authorize local governments to create and operate local or regional housing trust funds promoting affordable housing. S.C. Code Ann. § 31-22-10(B). Section 31-22-20 expressly begins, "For purposes of this chapter," before defining "homeless housing." S.C. Code Ann. § 31-22-20. The definition therefore identifies housing eligible for treatment under the housing-trust-fund chapter. It does not establish a statewide zoning use, amend the Pickens Zoning Ordinance, or state that "homeless housing" cannot simultaneously satisfy a local definition of group housing.

The two concepts are compatible. "Homeless housing" describes the population served and the form of assistance provided for purposes of Chapter 22. "Group housing" describes how the building is occupied for purposes of the City's Zoning Ordinance. A single facility may satisfy both descriptions. Nothing in §§ 31-22-10 or 31-22-20 makes the classifications mutually exclusive.

5. South Carolina law requires a functional comparison of the proposed operation to enacted use categories.

In *Furr v. Horry County Zoning Board of Appeals*, the applicable ordinance did not specifically permit or prohibit a hospice. The zoning administrator and BZA did not treat the absence of the word “hospice” as dispositive. They examined the facility’s actual care, staffing, activities, and operational characteristics and determined that it was comparable to permitted group housing or a nursing home rather than a prohibited hospital. 411 S.C. 178, 181–83 (Ct. App. 2014).

The Court of Appeals upheld that functional approach. It explained that determining whether the unlisted hospice was more comparable to permitted or prohibited uses required “a factual inquiry to discern the type of care, staffing, and activity” at the facility together with consideration of the relevant ordinance provisions. *Id.* at 185.

The June 17 determination did not conduct the analysis contemplated by *Furr*. It did not compare the proposed facility’s shared sleeping arrangements, lack of separate dwelling units, institutional configuration, staffing, supervision, services, occupancy, or intensity with the elements of group housing. Exhibit B at 2–4.

The record presently available supports the opposite conclusion: the building is designed and arranged for institutional shared residence; several persons will reside there; occupants will share accommodations; and there will be no separate dwelling units. Exhibit A at 1–3, 5. The Board should apply the functional approach required by *Furr* and find that Appellant’s residential component falls within the permitted group-housing category.

6. The proposed operation is a material continuation of the Property’s prior institutional residential use.

The application expressly presented the Property’s prior institutional residential use as a basis for approval. It states that the former facility housed up to 55 individuals, that the proposed baseline is 52 permanent beds, that the institutional residential floor plan remains intact, and that no material physical conversion is proposed. Exhibit A at 1–3, 5.

Under the functional definition recognized in *Furr*, the relevant “use” is the purpose or activity for which the building is designed, arranged, intended, occupied, or maintained. *Furr*, 411 S.C. at 184.

Both the former and proposed operations, as described in the application, involve multiple residents living in the same institutional building, sharing accommodations, using common corridors and facilities, and occupying the Property at a comparable scale. Exhibit A at 1–3, 5. A change in operator, program name, or resident population does not by itself establish a change in the physical and functional zoning use. The proper inquiry is whether the actual purpose, activities, intensity, and manner of occupancy are materially different.

The June 17 determination does not identify the following information: (a) the zoning classification under which the former operation was approved; (b) whether the former operation

was treated as group housing, a care home, or another institutional residential use; (c) whether a prior conditional-use approval remains applicable to the Property; (d) any physical distinction between the former and proposed residential arrangements; (e) any material increase in baseline occupancy or land-use intensity; or (f) any ordinance provision making the residents' homeless status a change in zoning use. Exhibit B at 1–4.

The omission is especially significant because the City possesses or should possess the historical zoning, occupancy, building, fire, and licensing records necessary to determine how the prior use was approved. The Board should find that the proposed operation is a continuation of the same essential institutional group-residential use. At minimum, it should require the City to produce and consider the historical records before determining that the proposed operation constitutes a prohibited new use.

The June 17 determination fails to address material evidence showing that the proposed operation is a material continuation of the Property's prior institutional residential use. An administrative classification of an unlisted or disputed use must rest on a factual comparison of actual operations and relevant ordinance categories. *Furr*, 411 S.C. at 184–85. The Board should reverse based on the existing record. Alternatively, if the Board determines the record is insufficient, it should remand the matter to the Zoning Administrator for a complete factual and historical analysis. South Carolina law expressly authorizes a BZA to remand when the record is insufficient for review. S.C. Code Ann. § 6-29-800(A)(4).

7. The City's interpretation raises substantial concerns under the Religious Land Use and Institutionalized Persons Act ("RLUIPA").

A. Religious nature of the Ministry and proposed use.

The Ministry's published history states that its founders' lives were changed by God's grace; that Pastor Tracy Gantt felt called to use his experiences to help persons struggling with homelessness, addiction, and hardship; that he was mentored and licensed to preach the Gospel; and that he later became Senior Pastor of New Deliverance Church and co-founded Tracy and Sunshine Gantt Ministries in 2015.

The Ministry's published history further states that homeless individuals began attending church services and seeking assistance, after which the Gantts searched for a local shelter, learned that none existed in Pickens County, and developed the shelter ministry. The Ministry's leadership page identifies Tracy Gantt as both the Ministry's Executive Director and Senior Pastor of New Deliverance Church and states that he provides spiritual leadership, program oversight, and strategic direction for the organization.

The Ministry's program description identifies spiritual counseling as one of the components of Pickens County Shelter of Hope, together with emergency housing, transitional housing, employment placement, recovery support, meals, and financial planning. The Ministry's materials repeatedly ground its work in Matthew 25:35–36, including the commands to feed the hungry, welcome the stranger, and clothe those in need.

The foregoing is supported by the Tracy and Sunshine Gantt Ministries Website Materials, attached hereto as Exhibit C.

Appellant is further willing to supplement the record with sworn declarations from Tracy and Sunshine Gantt explaining (a) the Ministry's sincerely held religious beliefs; (b) the religious obligation to shelter and minister to persons in need; (c) how emergency and transitional housing carries out those beliefs; (d) the spiritual counseling, prayer, pastoral care, worship, Bible study, or other religious activities actually intended for the Property; (e) the integration of the residential and supportive-service components; and (f) the specific effect that denial of the residential component will have on the Ministry's religious exercise.

B. Application of RLUIPA

RLUIPA defines "religious exercise" broadly to include any exercise of religion, whether or not compelled by or central to a system of religious belief. It expressly provides that using, building, or converting real property for religious exercise constitutes religious exercise by the person or entity using or intending to use the property. 42 U.S.C. § 2000cc-5(7). RLUIPA further defines a "land use regulation" as a zoning law, or the application of a zoning law, restricting a claimant's use or development of land where the claimant has an ownership, leasehold, contractual, or other qualifying interest in the property. 42 U.S.C. § 2000cc-5(5).

The application states that Appellant executed a commercial lease for the Property in April 2026, and the challenged determination applies the City's Zoning Ordinance to prohibit the proposed residential component. Exhibit A at 1; Exhibit B at 1–4. The Certificate of Zoning Compliance process and this administrative appeal involve an individualized assessment of Appellant's proposed property use. The Zoning Administrator examined Appellant's particular submission, separated the proposal into four components, classified each component, and issued a site-specific determination. Exhibit B at 1–4. RLUIPA's substantial-burden provision applies to a land-use system permitting individualized assessments of proposed property uses. 42 U.S.C. § 2000cc(a)(2)(C).

RLUIPA prohibits a government from implementing a land-use regulation in a manner that imposes a substantial burden on a religious institution's religious exercise unless the government proves that the burden furthers a compelling governmental interest through the least restrictive means. 42 U.S.C. § 2000cc(a)(1). RLUIPA also prohibits treating a religious assembly or institution on less than equal terms with a similarly situated nonreligious assembly or institution and prohibits land-use regulations that unreasonably limit religious assemblies, institutions, or structures within a jurisdiction. 42 U.S.C. § 2000cc(b)(1), (3).

Upon information and belief, the City has permitted, approved, accommodated, or otherwise allowed similarly situated nonreligious entities to conduct residential, institutional, lodging, charitable, or social-service uses that are comparable to the Ministry's proposed use with respect to the relevant zoning considerations, including occupancy, shared living arrangements, traffic, parking, staffing, supervision, and use of an institutional facility. Such entities include, without limitation, the prior institutional residential-care occupant of the Property, which, upon information and belief, was a nonreligious entity and was permitted to house up to 55 individuals

in the same building and substantially the same institutional residential configuration that the Ministry now proposes to use for 52 permanent beds. The City's allowance of that prior nonreligious institutional residential use, while categorically prohibiting the Ministry's comparable religious residential use, raises substantial concerns under RLUIPA's equal-terms provision, 42 U.S.C. § 2000cc(b)(1).

The Fourth Circuit considers both the magnitude of the impediment to religious exercise and whether the impediment is attributable to the government rather than self-imposed by the religious claimant. Relevant considerations include whether the claimant had a reasonable expectation of conducting the religious use, whether the restriction is absolute or conditional, whether the proposed property serves an unmet religious need, and whether denial would require acquisition of another property or materially impair the religious mission. *Jesus Christ Is the Answer Ministries, Inc. v. Baltimore County*, 915 F.3d 256, 261–63 (4th Cir. 2019); *Canaan Christian Church v. Montgomery County*, 29 F.4th 182, 192–95 (4th Cir. 2022).

Tracy and Sunshine Gantt Ministries is not merely a secular social-service organization operated by persons who happen to be religious. Its history, leadership, and activities demonstrate that it is a Christian religious ministry and that sheltering persons experiencing homelessness is an institutional expression of its sincerely held religious beliefs. Pickens County Shelter of Hope arose directly from the Gantts' church and pastoral ministry. The Ministry states that persons experiencing homelessness began attending church services and asking for assistance. After discovering that Pickens County lacked a local shelter, the Gantts organized a team to establish a place where those individuals could receive shelter, stability, support, and hope. The shelter was therefore created as a response to a need encountered through the Ministry's church work and to what its founders understood as their religious calling.

The Ministry expressly integrates religious activity into its shelter program. Its published description of Pickens County Shelter of Hope identifies "Spiritual Counseling" as a program component alongside emergency housing, transitional housing, recovery support, employment placement, meals, and financial planning. The Ministry repeatedly grounds its work in Matthew 25:35–36, including the scriptural commands to feed the hungry, welcome the stranger, and clothe those in need.

The residential shelter is thus not an incidental commercial activity that happens to fund or accompany the Ministry's religious work. Providing a place of refuge, welcoming persons who otherwise lack housing, meeting their practical needs, offering spiritual counseling, and helping them pursue restoration are themselves the means by which the Ministry carries out its Christian beliefs.

The Ministry holds a leasehold interest in 404 Hampton Avenue. It seeks to use the Property for an integrated ministry consisting of emergency and transitional housing, spiritual and practical support, outpatient healthcare access, workforce assistance, and community-resource services. The City's application of its zoning ordinance to that leased property is a "land use regulation" within the meaning of 42 U.S.C. § 2000cc-5(5). Certificate of Zoning Compliance Application dated June 5, 2026, at 1–5.

The City approved the proposed clinical, workforce-development, and administrative components but categorically prohibited the overnight residential component. The City did not impose a limited condition concerning occupancy, parking, staffing, security, or building safety. It determined instead that the Ministry may not provide emergency or transitional residential shelter at the Property at all. Zoning Administrator Determination dated June 17, 2026, at 1–4.

Upon information and belief, the City has not applied the same categorical prohibition to all similarly situated nonreligious entities. In particular, the City previously permitted, approved, recognized, tolerated, or otherwise accommodated the Property’s prior institutional residential-care use, which involved substantially similar shared residential occupancy at an equal or greater capacity. Upon further information and belief, the City has afforded approvals, exceptions, accommodations, or continued-use treatment to other nonreligious residential, institutional, lodging, charitable, and commercial entities whose uses were not expressly identified—or were not otherwise fully conforming—under the applicable zoning classification. The Ministry has requested, and intends to supplement the record with, the City’s records concerning those comparable uses and the approvals, exceptions, accommodations, variances, special exceptions, nonconforming-use determinations, or other treatment afforded to them.

That prohibition directly interferes with the religious activity the Ministry seeks to conduct. The Ministry’s religious exercise is not limited to offering daytime counseling, referrals, or employment assistance. Its religious mission includes welcoming persons who have nowhere to live and providing them with an actual place of refuge, overnight shelter, ongoing spiritual care, and a structured path toward stability. Permitting the Ministry to counsel homeless persons during the day while prohibiting it from sheltering those same persons overnight prevents the Ministry from carrying out the very activity through which it understands itself to be obeying its religious calling.

The City’s interpretation would therefore require the Ministry to choose among materially altering its religious conduct, separating the shelter component from its integrated ministry, abandoning the proposed use of the Property, or acquiring and obtaining approval for another property. It is not merely a regulation of the manner in which the Ministry conducts its religious exercise; it is an absolute prohibition on the principal residential component of that exercise at this Property.

The Ministry’s religious character cannot provide a basis for treating its proposed use less favorably than a materially comparable secular institutional residential use. To the extent the City has interpreted its ordinance flexibly, recognized a continuing use, granted an accommodation, or assigned an existing zoning classification to permit similarly situated nonreligious entities to operate, RLUIPA requires that the Ministry receive treatment on terms no less favorable unless the City can establish a legally sufficient basis for the distinction. The City should therefore identify the secular comparators it has permitted or accommodated, the zoning purposes allegedly distinguishing those uses from the Ministry’s proposed use, and the evidence supporting any asserted distinction.

RLUIPA expressly recognizes that a government may avoid a substantial burden by modifying its policy, granting an exemption, or using any other means that eliminates the burden.

42 U.S.C. § 2000cc-3(e). The Board can avoid the substantial burden without invalidating the Zoning Ordinance or exempting the Ministry from generally applicable safety standards. It can apply the ordinance's existing group-housing classification to the Ministry's actual operation and impose reasonable, objective conditions addressing demonstrated land-use impacts. The Ministry therefore requests that the Board reverse the Zoning Administrator's categorical prohibition and determine that the proposed residential component constitutes permitted group housing. A contrary determination would prevent the Ministry from using the Property to perform an integrated and central component of its sincerely held religious mission and would substantially burden its religious exercise within the meaning of 42 U.S.C. § 2000cc(a)(1).

V. Alternative Request for Remand

Appellant requests reversal based on the existing ordinance text and application record. Alternatively, if the Board concludes that the present record is insufficient to make a final determination, Appellant requests remand under S.C. Code Ann. § 6-29-800(A)(4), with instructions that the Zoning Administrator do the following:

- a. obtain and review the complete historical zoning and occupancy file for the Property;
- b. identify the precise zoning classification and approval under which the former institutional residential facility operated;
- c. determine whether prior approvals run with the Property;
- d. compare the former and proposed operations by reference to their actual activities, occupancy, physical configuration, staffing, intensity, traffic, parking, and services;
- e. apply the enacted definition of group housing rather than an undefined program label;
- f. identify each objective condition that Appellant must satisfy;
- g. consider whether reasonable conditions can address any demonstrated health, safety, parking, occupancy, or operational concern;
- h. identify all similarly situated nonreligious residential, institutional, lodging, charitable, or social-service uses that the City has permitted, approved, accommodated, recognized as continuing, or otherwise allowed, including the Property's prior institutional residential-care use;
- i. identify the zoning classification, approval, exception, accommodation, variance, special exception, nonconforming-use determination, or other authorization applicable to each such use;
- j. determine whether any difference in treatment between those nonreligious uses and the Ministry's proposed religious use is based on objective land-use considerations stated in the Zoning Ordinance; and
- k. address the federal religious-land-use issues raised in this appeal.

VI. Requested Relief

For the reasons stated above, Appellant respectfully requests that the Board:

- a. Reverse the June 17, 2026 determination insofar as it denies the residential component of Appellant's proposed use;

- b. Determine that the residential component constitutes “group housing” within the meaning of Article XIV, § 1401 of the City of Pickens Zoning Ordinance;
- c. Determine that group housing is an authorized conditional use in the GBD through §§ 408.2(A), 407.3(A), 405.3(A), and 404.3(B);
- d. Determine that the June 17, 2026 determination violates the Religious Land Use and Institutionalized Persons Act and reverse or modify the determination as necessary to remedy that violation;
- e. Direct the issuance of the Certificate of Zoning Compliance, subject to satisfaction of the objective conditions actually imposed by the Zoning Ordinance and other generally applicable building, fire, health, safety, and licensing requirements;
- f. Interpret and apply the Zoning Ordinance in a manner that permits Appellant to conduct the proposed residential component of its religious ministry and avoids the substantial burden and unequal treatment prohibited by RLUIPA, including by determining that the proposed residential component constitutes permitted group housing and, as appropriate, imposing reasonable and objective conditions addressing demonstrated land-use impacts;
- g. Alternatively, determine that the proposed operation is materially continuous with the Property’s prior lawful institutional residential use;
- h. Alternatively, remand the matter with the specific instructions set forth above;
- i. Require the Zoning Administrator to transmit and include in the administrative record all materials upon which the challenged determination was based and all historical zoning and occupancy records concerning the Property;
- j. Grant Appellant leave to supplement the record with declarations, historical records, operational materials, comparator evidence, and additional legal authority before or at the hearing;
- k. Grant such other relief as is within the Board’s lawful authority and is necessary to avoid or remedy a violation of RLUIPA and to permit Appellant’s protected religious exercise; and
- l. Issue a written final order separately stating all findings of fact and conclusions of law, as required by S.C. Code Ann. § 6-29-800(F).

EXHIBIT A

Application for Certificate of Zoning Compliance dated June 5, 2026



June 5, 2026

To: City of Pickens Planning and Development Division

Attn: Zoning Administrator

Re: Certificate of Zoning Compliance Application for 404 Hampton Ave (Parcel ID: 4181-16-92-2817)

To the City of Pickens Planning and Development Division,

Please find enclosed our application for a Certificate of Zoning Compliance for the property located at 404 Hampton Ave, Pickens, SC 29671. This application is submitted on behalf of **Tracy and Sunshine Gantt Ministries (operating as Pickens County Shelter of Hope)**, following the official execution of our commercial lease for this property in April 2026.

Our proposed use is to transition this established facility into a multi-service community resource hub and emergency transitional housing center. We wish to highlight to the Planning Division that our use serves as a direct, compatible continuation of the property's long-standing, locally approved history as an institutional residential care facility.

To maximize the civic and commercial utility of the General Business District (GBD), the facility will feature a robust daytime community resource hub utilizing the pre-existing commercial infrastructure built inside the facility:

1. **Medical/Clinical Services:** Partnering with Foothills Community Health Care to utilize the pre-existing, fully intact on-site nurse's office for localized health consultations.
2. **Workforce & Job Placement Services:** Transitioning one of the pre-existing executive conference rooms into an active computer lab and job training hub managed by Goodwill.
3. **Administrative Co-Working Space:** Utilizing the pre-existing on-site office cubicles to host localized desks for our community non-profit and civic partners.



The transitional lodging component will strictly maintain the building's historical footprint and operational scale. The previous facility operated with an approved occupancy capacity of 55 individuals. Our program will continue to operate identical to our current capacity, utilizing 52 permanent beds, staying safely below that baseline density while retaining the flexibility to accommodate up to 60 individuals during peak community emergency overflow events.

Furthermore, this transition requires absolutely zero modifications to the building's existing life-safety egress paths, emergency exits, or interior corridors.

While the previous operator ceased operations on-site in 2024, the property itself has never been physically abandoned, modified, or converted away from its core institutional configuration. The interior infrastructure remains uniquely engineered and intact exclusively for residential care and community service occupancy.

Following our lease execution, our organization immediately took physical possession of the site to maintain the property, execute an interior clean-out, and begin cosmetic renovations—including essential weatherproofing repairs to an active roof leak. To support our application, we are providing commendation letters to show that this facility is a vital part of the community.

We look forward to collaborating with the City of Pickens to revitalize this vital community asset. Please contact me directly at 864-202-1222 (personal cell) or gloryforhim2015@gmail.com if you require any additional information.

Sincerely,

Sunshine Gantt

Associate Director/CFO/Co-Founder

Tracy and Sunshine Gantt Ministries/Pickens County Shelter of Hope



Certificate of Zoning Compliance \$10

Before a building permit can be issued within the City of Pickens, the applicant must provide information to show the proposed construction, erection, alteration or movement of a structure conforms with the City's zoning ordinances (which includes the overlay standards).

Prior to, or as part of the building permit application process, you must complete this Certificate of Zoning Compliance form and submit to City Hall or via email at vissage@scacog.org.

Applicant Information (please print or type) *

Name	Tracy and Sunshine Gantt Ministries		
Mailing Address	P.O. Box 223, Easley, SC 29641		
Phone Number	(Sunshine Personal Cell)	Email Address	@gmail.com

Property Information (please print or type) *

Property Owner's Name(s)	SCF RC Funding IV LLC
Property Address (must be established by Pickens County Addressing)	404 Hampton Ave. Pickens, SC 29671
Parcel Number (Pickens County Tax Map Number)	4181-16-92-2817
Zoning District	GBD
Describe Current Condition	See attached document

Project Information (please print or type) *

Proposed Use (Single Family, Multi Family, Accessory, Addition). Include total square footage and a drawing of lot with location of construction and setbacks identified.		Transition of an existing institutional residential care facility into a multi-service community resource hub and emergency transitional housing center. Daytime services utilize pre-existing office/clinical space for healthcare consultations (Foothills Community Health Care), job training (Goodwill), and partner administrative desks. Residential use is a continuation of the previous facility footprint, utilizing 52 permanent beds (historical capacity: 55).				
Lot Width at Building Line	Lot Area	Front Setback**	Side Setback**	Rear Setback**	Buffer Required	# of Parking Spaces

* The applicant is responsible for the accuracy & completeness of the information provided.

** For setbacks, put the distance between the building and the property line (# of feet).

I (we) certify that the information contained in this document is true and accurate.

Sunshine Gantt

6/5/2026

Applicant's signature

Date

Checklist (A completed application must include the following):

- 1) Completed Zoning Compliance Form
- 2) If new construction, an address must be established by Pickens County
- 3) Water/Sewer Availability Letter (Please call City Hall to obtain)
- 4) Completed Plat with setbacks shown

ONCE EVERYTHING IS COMPLETED AND SUBMITTED, STAFF WILL REVIEW AND COLLECT THE \$10 FEE. ONCE EVERYTHING IS APPROVED AND THE FEE IS COLLECTED, YOUR FORM WILL BE SENT BACK APPROVED AND YOU WILL BE ABLE TO OBTAIN A BUILDING PERMIT FROM PICKENS COUNTY.PLEASE NOTE THAT YOU WILL ALSO NEED AN UP TO DATE BUSINESS LICENSE FROM THE CITY OF PICKENS.

Overlay District (Check One)		☐ City Center	☐ Commercial & Industrial	☒ Not Applicable
☐ Approved	Comment			
☐ Not Approved	Comment			

Zoning Administrator's Signature _____ Date _____



Current Condition of Property 404 Hampton Ave.

- **Structure Footprint & Exterior:** The property consists of an existing, freestanding 32,181 square foot masonry and stone commercial building originally constructed in 1978. The exterior facade, foundation slab, and framing are fully intact and structurally sound. The building is currently undergoing routine property stabilization and facility maintenance, which includes essential weatherproofing repairs to the existing flat roof assembly to resolve an active leak. No modifications to the roofline, building height, or structural load-bearing roof elements are being made.
- **Life Safety & Egress:** All existing emergency exits, fire egress corridors, doors, and exterior walkways remain fully intact, unobstructed, and completely unchanged from their previously approved institutional layout. No structural alterations to the building's entry or exit paths are proposed.
- **Internal Layout & Partnership Readiness:** The interior layout remains configured to its long-standing institutional residential and administrative floorplan. The building's pre-existing, specialized built-in elements are fully intact and will be used as-is for community partnerships, specifically: the built-in nurse's office (clinical partnership with Foothills Community Health Care), the executive conference room (computer lab and job placement partnership with Goodwill), and the intact administrative cubicle rows (co-working space for community service partners).
- **Capacity & Density:** The building previously operated at a 55-person occupancy capacity. The current interior contains 52 permanent beds, presenting a baseline occupancy density lower than the property's historical operational use.
- **Site Infrastructure & Setbacks:** The 2.90-acre parcel features fully established, pre-existing commercial setbacks on all four sides. All outdoor utility tie-ins (public water, sewer, and electricity) remain fully connected and active.
- **Parking & Access:** The asphalt parking lot on the east side of the building is fully paved, demarcated with standard spaces, and requires no layout changes, expansions, or new grading. Access drives from Hampton Ave are completely unobstructed.
- **Active On-Site Work:** Current activity on-site is strictly limited to cosmetic renovations and routine facility maintenance (including painting, deep cleaning, minor drywall patching, flooring, and the aforementioned roof weatherproofing). No load-bearing walls are being modified.

Mayor
ISAIAH SCIPIO
City Council
CAMERON RIVERS
ALLIE WINTER- MAYOR PRO TEM
DANNY ADAMS
FLOYD ROGERS
RAY WILSON
JONATHAN BAKER



Administrator
TIM O'BRIANT
City Clerk
DONNA OWEN

To whom this may concern,

The water and sewer for the location at 404 Hampton Avenue is available and provided through the City of Pickens. If further information is needed, please reach out to the City of Pickens Public Works Director Trey Adams. His contact information is tadams@pickenscity.com or (864) 898-8149.

Thank you.

Rebecca Cockrell
Utility Clerk
rcockrell@pickenscity.com
(864) 898-8157







1:23

Penrose

100%



Street



State of South Carolina Office of the Governor

NIKKI R. HALEY
GOVERNOR

1205 PENDLETON STREET
COLUMBIA 29201

February 22, 2016

The Reverend and Mrs. Tracy Gantt
Post Office Box 223
Easley, South Carolina 29641

Dear Reverend and Mrs. Gantt,

I want to take a moment to thank you for your efforts to help combat the issue of homelessness in the City of Easley. Drawing on your life experiences, you recognize the challenges faced by others and offer the much-needed guidance to turn their lives around. South Carolina is fortunate to have caring, compassionate people like you who see a need in the community and take the necessary steps to address it. Thank you for making a difference and God bless.

My very best,

A handwritten signature in blue ink that reads "Nikki".

Nikki R. Haley

NRH/ld

*You make
South Carolina Proud!*

OFFICE OF THE MAYOR

Easley, South Carolina

Proclamation



WHEREAS; Tracy and Sunshine Gantt have given of their time and resources to bring awareness to the homelessness in Pickens County; and

WHEREAS; in Pickens County alone over 1900 children are considered homeless and that number increase when adults are added in; and

WHEREAS; Tracy and Sunshine Gantt show every day through their actions that they truly care about their community and the people who live here, and

WHEREAS; by working diligently to open the Pickens County Shelter of Hope they will provide shelter, food, and give encouragement to those needing it the most;

NOW, THEREFORE BE IT RESOLVED that I, Mayor Larry Bagwell do hereby recognize Tracy and Sunshine Gantt for their compassion and the volunteer spirit they provide to the City of Easley and its forgotten citizens.



*In witness whereof I have hereunto set my hand
and caused the seal of this city to be affixed.*

Larry Bagwell

MAYOR

December 2, 2019

DATE



HENRY McMASTER
GOVERNOR

December 4, 2019

Pastor and Mrs. Tracy Gantt
Tracy and Sunshine Gantt Ministries
Post Office Box 223
Easley, South Carolina 29641

Dear Pastor and Mrs. Gantt,

It is my pleasure to recognize you for work on behalf of less fortunate residents of Pickens County.

One of the greatest treasures of our beautiful state is the caring people who identify a need in their community and take steps to address it. Drawing on your personal experiences and journey to a Christ-centered life, you connect with members of the community who are struggling with difficult challenges and help them find their way to recovery and a brighter future. From food and clothing to the Pickens County Shelter of Hope, you help meet the tangible needs of others while serving up a heaping helping of compassion, kindness, and encouragement. Peggy and I thank you for your generous contributions that impact the lives of so many people, and we wish you much success in the years ahead.

Yours very truly,

A handwritten signature in blue ink, which appears to read "Henry McMaster".

Henry McMaster

HM/kt



CITY OF Clemson SOUTH CAROLINA

August 27, 2024

Pastor and Mrs. Tracy Gantt
Tracy and Sunshine Gantt Ministries
Post Office Box 223
Easley, South Carolina 29641

Dear Pastor and Mrs. Gantt,

I am honored to recognize your compassionate efforts towards helping the less fortunate and combatting homelessness in Pickens County.

Those who find themselves in a difficult situation, no matter the cause, are much more likely to get out of that situation when they experience the kindness and empathy of others. Those needing help in Pickens County are fortunate to have Tracy and Sunshine Gantt Ministries to provide that small boost without judgement. After eight years of operating a clothing ministry to provide clothing and other necessities to those in need, you decided to do more and opened the Shelter of Hope, the first and only homeless shelter in Pickens County. Four years later, the shelter houses 50 to 60 individuals each day. Furthermore, you have been open and honest about your previous struggles and channeled those challenges and the understanding that comes with them into a way to help others in similar situations. Not only do you serve as an example of hope that better days are ahead, you also bear the true mark of courage, strength, and love. While it is unfortunate that your services are necessary in our community, we are all blessed to have someone like you willing to provide those services.

Thank you for all of your dedication and sacrifice.

Sincerely,

Robert Halfacre
Mayor, City of Clemson

EXHIBIT B

Zoning Administrator Determination dated June 17, 2026



Tracy and Sunshine Gantt Ministries <gloryforhim2015@gmail.com>

Zoning letter for 404 Hampton Avenue

1 message

Jeff Guilbault <JGuilbault@scacog.org>

Wed, Jun 17, 2026 at 12:46 PM

To: Tracy and Sunshine Gantt Ministries <[REDACTED]@gmail.com>

Cc: Tim O'Briant <tobriant@pickenscity.com>, Matthew Chappell <mchappell@pickenscity.com>, Jennifer Vissage <vissage@scacog.org>

Ms. Gantt,

This letter is in response to your request for a Certificate of Zoning Compliance for the property at 404 Hampton Avenue in the GBD General Business District. After reviewing your submittal, I have identified four proposed uses for the building, which I will address individually for zoning compliance.

1. **Medical/Clinical Services** – The use of “Hospital or clinic” is allowed as a conditional use in the GBD General Business District. This is addressed in Section 408.3F of the zoning ordinance:

408.3F. Hospitals or clinics, including any functions which relate directly to the operation of the hospitals or clinics and are contained within the confines of said hospital or clinic.

The ordinance defines clinic as - *Clinic*. An establishment where medical or dental patients, who are not lodged overnight, are admitted for examination or treatment.

Based on this language, a clinic would be allowed as a conditional use at this address, provided patients are not lodged overnight

2. **Workforce & Job Placement Center** – The use of “Business Center” is allowed as a conditional use in the GBD General Business District. Section 408.2 states:

408.2A Any use, together with the conditions attached thereto permitted in the CBD and NBD Zoning Districts.

406.3.1H Business center:

1. Must provide one parking space per every one hundred fifty (150) square feet.
2. A business center is defined as a place providing office facilities and services such as management training or office space to new and startup companies.

There is no other definition of a business center.

Based on this language, a workforce & job placement center would be allowed on the site.

3. **Administrative Co-Working Space** – The use of “General Office” is allowed as a permitted use in the GBD General Business District. Section 408.2 states:

408.2A Any use, together with the conditions attached thereto permitted in the CBD and NBD Zoning Districts.

407.2B General offices.

There is no other definition of an office.

Based on this language, an administrative co-working space would be allowed.

4. **Transitional Lodging** – Transitional Lodging is not allowed in the GBD General Business District.

408.2A Any use, together with the conditions attached thereto permitted in the CBD and **NBD Zoning Districts**.

407.3. *Conditional uses*. The following uses shall be permitted in any NBD Zoning District on a conditional basis, subject to conditions of this section, unless otherwise noted, and Article IX, **Sections 906** and 907.

A. All conditional uses permitted in the R-12 and **RM-16 Districts** as shown in Article IV, Sections 401.3 and 403.3, shall be permitted in any NBD District on a conditional basis subject to the conditions set forth for the district in which the conditional use is first listed.

405.3. *Conditional uses*. The following uses shall be permitted in any RM-16 Zoning District subject to conditions of this section, unless otherwise noted, and Article IX, **Sections 906** and 907.

A. All conditional uses permitted in the R-12, R-10, R-8 and **RM-8 Districts** shall be permitted in any RM-16 District on a conditional basis subject to the conditions set forth for that district.

404.3. *Conditional uses*. The following uses shall be permitted in any **RM-8 Zoning District** subject to the conditions of this section, unless otherwise noted, and Article IX, **Sections 906** and 907.

B. Group housing provided such facilities conform with any applicable requirements of the state, provided plans for such facilities receive the written approval of any county boards prior to the issuance of any permits for construction and operation, copies of such approval to be attached to the building permit and to be retained in the files of the zoning administrator.

Following this chain, the use of “Group homes” is allowed in the General Business District. It is the position of the City of Pickens that a transitional lodging facility is not the same as a group housing facility and is therefore not allowed in the GBD General Business District.

Group homes and homeless housing are defined differently under South Carolina state law. Group homes typically relate to specific populations, such as the mentally or physically handicapped, or children.

Group Homes in State Law

The State of South Carolina addresses group homes in Section 6-29-770. This section states that State agencies must comply with local laws. Facilities with 9 or fewer mentally or physically handicapped residents, providing

24-hour care, are exempt from zoning and must be treated like single-family homes.

Group Homes in the City of Pickens Zoning Ordinance

The zoning ordinance defines group homes as follows:

ARTICLE XIV. - DEFINITIONS

Group housing. A building or structure used as a place of residence by several persons who share the living accommodations and do not occupy separate dwelling units. The following are considered group quarters: institutions, dormitories, rooming and boarding houses, and similar establishments.

Homeless Housing in State Law

Homeless housing appears to be regulated by Section 31-22-10. This section defines homeless housing as:

(2) "Homeless housing" means emergency, transitional, or permanent residential housing shelter for a person needing special assistance and shelter because he is homeless as defined by HUD or consistent with another definition of homelessness under which a person may receive federal financial assistance, state financial assistance, or another supportive service.

This section allows local governments to establish housing trust funds.

Homeless Housing in the City of Pickens Zoning Ordinance

The zoning ordinance makes no mention of homeless housing, homeless shelters, transitional lodging, or similar uses in any zoning district. Since zoning is permissive, if it is not explicitly listed as a permitted or conditional use, it is not allowed. Under the current zoning regulations, a homeless shelter would not be allowed in the City.

Based on this reading of the City of Pickens Zoning Ordinance, the clinic, job training center, and co-working space are permitted in the GBD General Business District. The transitional lodging component would not be allowed.

Appeals

This ruling is the zoning administrator's interpretation of the zoning ordinance. Under South Carolina law, you have the right to appeal this decision to the Board of Zoning Appeals. Any appeal of this decision must be made within 30 days of the date of this e-mail. I have attached a copy of the Application for Appeal with this e-mail. There is a \$50 fee associated with this application.



Jeffrey Guilbault, AICP, CCEA
Zoning Administrator
219 Pendleton Street
Pickens, SC 29671
(864) 241-4629
www.cityofpickens.com

 **appeal.docx**
108K

EXHIBIT C

Tracy and Sunshine Gantt Ministries Website Materials

Restoring Hope. Serving Our Community. Changing Lives.

EN

TRACY AND SUNSHINE GANTT MINISTRIES

Serving Pickens County, SC through outreach programs, housing support and community initiatives that help individuals and families move from crisis to stability.

HELPING HANDS



Pickens County Shelter of Hope Album
Tracy and Sunshine Gantt Ministries

OUR MISSION

Tracy and Sunshine Gantt Ministries provides essential resources, food, housing and support to individuals and families facing homelessness and poverty in Pickens County, SC. As the founders of Pickens County Shelter of Hope, the first and only Emergency-To-Transitional Housing Program in the county, we are committed to offering hope, stability, and a path toward a better future.

[Read more](#)



Watch on

LISTEN TO OUR ALBUM

HOW YOU CAN HELP

- Ways to Support:
 - Donate (Monetary and in-kind gifts)
 - Donate Your Unwanted Vehicle
 - Volunteer
 - Become a Monthly Supporter
- Every dollar helps keep our doors open. Learn how you can make a difference today! *

REQUEST A BED

Need A Place To Stay?

If you need emergency shelter, give our shelter staff a call at 864-507-3112 and learn more about our intake process.

Call Us

[Learn more](#)



An Emergency-To-Transitional Housing Program Serving Pickens County SC

- Description: Since opening during the Covid-19 pandemic in 2020, Pickens County Shelter of Hope has operated as the county's first and only structured Emergency-To-Transitional Housing Program, serving 50-60 men and women daily. We provide immediate housing for individuals in crisis, followed by a structured program focused on employment, recovery support, financial stability and long-term independence.
- Program Components:
 - Emergency Intake & Immediate Housing
 - Showers & Hygiene
 - Transitional Housing with Structured Expectations
 - Employment Placement (Within 14 Days)
 - Recovery Support & Accountability
 - Spiritual Counseling
 - Financial Planning & Savings Development
 - Daily Meals & Stabilization Support

GIVE TODAY TO HELP END HOMELESSNESS

[Donate Now](#)



PICKENS COUNTY[®] SHELTER OF HOPE

A PROGRAM OF TRACY AND
SUNSHINE GANTT MINISTRIES

CONTACT US

Mailing Address:
P.O. Box 223
Easley, SC 29641
Physical Address:
106 King Street
Easley, SC 29640
Shelter Phone:
864-507-3112

CONNECT WITH US

[Facebook \(Organization\)](#)
[Facebook \(PCSOH\)](#)
[Instagram \(PCSOH\)](#)

EMAIL US

Info@tsgministries.com

Gold
Transparency
2024

Candid.

Gold
Transparency
2025

Candid.

"For I was hungry and you gave me something to eat, I was thirsty and you gave me something to drink, I was a stranger and you invited me in, I needed clothes and you clothed me."

— Matthew 25:35-36

REGISTERED NONPROFIT NUMBER : 47-3704403

© 2026 by Tracy and Sunshine Gantt Ministries/Designed By Sunshine Gantt

Restoring Hope. Serving Our Community. Changing Lives.

OUR STORY

The story of Tracy and Sunshine Gantt Ministries did not begin with a nonprofit organization, a church, or a homeless shelter.

It began with two people whose lives were forever changed by God's grace.

Tracy and Sunshine met as teenagers at the ages of 18 and 14. On Valentine's Day 1999, they were married at the ages of 22 and 18. Like many young couples, they had dreams and plans for their future. However, those dreams were soon overshadowed by addiction, gang involvement, poor choices, and the challenges that followed.

Approximately two years into their marriage, the couple separated.

During those years apart, both Tracy and Sunshine experienced homelessness for different reasons and faced some of the most difficult seasons of their lives. Tracy ultimately served a two-year prison sentence. While incarcerated, God began working in his life in a powerful way. During that time, Tracy felt God revealing that his testimony would one day be used to help others struggling with homelessness, addiction, and life's hardships.

At the same time, God was working in Sunshine's life as well.

After eight years of separation, God reunited Tracy and Sunshine in 2009. What seemed impossible became possible through faith, restoration, and God's grace.

In 2012, the Gantts became business owners, operating thrift store locations in Easley and Marietta, South Carolina (Delight\$ 4 a Dollar). Their Easley location was recognized with the Easley Patch Readers' Choice Award for Best Children's Clothing.

In 2013, after being encouraged by a local pastor, the couple made a life-changing decision. They closed both thrift stores, moved their inventory into the local pastor's church, and began giving it away free of charge to individuals and families in need.

As Tracy continued serving in ministry, that same pastor took him under his wing, mentored him, and eventually licensed him to preach the Gospel.

Two years later, in 2015, that pastor passed away. Tracy was called to serve as Senior Pastor of New Deliverance Church in Easley, South Carolina. That same year, Tracy and Sunshine officially founded Tracy and Sunshine Gantt Ministries and began expanding their outreach efforts throughout the community.

Following the formation of the ministry, Tracy and Sunshine dedicated themselves fully to serving others. What started with giving away clothing expanded into community cookouts, food distributions, holiday assistance programs, and outreach initiatives designed to meet practical needs while sharing hope with those facing difficult circumstances.

One of the ministry's earliest community events was a cookout held to introduce Pastor Tracy Gantt to the community as Senior Pastor of New Deliverance Church while also bringing together local residents and law enforcement during a time of heightened tension throughout the nation. The event received local media coverage and reflected the ministry's commitment to building relationships and strengthening the community.

The ministry also launched programs such as Prison Mommies, which provided Christmas gifts for children of incarcerated mothers. In 2016, the organization began hosting its annual Back-to-School Bash, an outreach that has grown to serve thousands of children and families throughout Pickens County. Over the years, additional outreach efforts included free yard sales, block parties, food distributions, clothing assistance, and community events designed to meet both practical and spiritual needs.

Through these outreach efforts, Tracy and Sunshine quickly realized that many of the challenges facing individuals in the community were interconnected. Food insecurity, poverty, addiction, unemployment, and homelessness often went hand in hand.

Then something happened that would change the course of the ministry forever.

Homeless individuals began attending church services seeking help. Wanting to connect them with local resources, Tracy and Sunshine began searching for a homeless shelter in Pickens County.

To their surprise, they discovered there wasn't one.

They drove throughout the county looking for options. They spoke before Easley City Council, Pickens County Council, and South Carolina state leaders. Everywhere they turned, they found the same reality: there was no local solution for individuals experiencing homelessness in Pickens County.

Rather than accept that reality, they began gathering others who shared the same passion and burden for helping those in need. A dedicated team formed around a common vision: creating a place where people experiencing homelessness could find hope, stability, and support. While several of those early team members have since passed away, their contributions helped lay the foundation for what would eventually become Pickens County Shelter of Hope.

In 2018, the organization located a building in Pickens County and began the long process of transforming it into a shelter. After nearly two years of renovations, planning, and preparation, Pickens County Shelter of Hope received its Certificate of Occupancy in March 2020.

Just days later, the COVID-19 pandemic brought much of the country to a standstill.

After receiving approval from the State of South Carolina to operate as an essential service, Pickens County Shelter of Hope officially opened its doors on April 4, 2020, becoming the first and only emergency to transitional housing program serving Pickens County.

Since opening, the shelter has provided housing, meals, showers, laundry services, employment assistance, recovery referrals, transportation to rehabilitation programs, and supportive services to individuals working to rebuild their lives.

Today, Tracy and Sunshine Gantt Ministries continues to serve the community through outreach programs, annual Back-to-School Bashes, community events, and Pickens County Shelter of Hope.

What began as a story of brokenness, homelessness, addiction, incarceration, and separation has become a story of restoration, service, hope, and second chances.

Because we believe that no life is beyond redemption.

And because we know firsthand that one act of compassion can change a life forever.

SUPPORT US TODAY

CONTACT US

Mailing Address:
P.O. Box 223
Easley, SC 29641
Physical Address:
106 King Street
Easley, SC 29640
Shelter Phone:
864-507-3112

CONNECT WITH US

[Facebook \(Organization\)](#)
[Facebook \(PCSOH\)](#)
[Instagram \(PCSOH\)](#)

EMAIL US

info@tsministries.com



"For I was hungry and you gave me something to eat, I was thirsty and you gave me something to drink, I was a stranger and you invited me in, I needed clothes and you clothed me."
— Matthew 25:35-36

REGISTERED NONPROFIT NUMBER : 47-3704403

© 2024 by Tracy and Sunshine Gantt Ministries/Designed By Sunshine Gantt

Restoring Hope. Serving Our Community. Changing Lives.

< Back

PASTOR TRACY AND SUNSHINE GANTT

Co-Founders & Executive
Leadership

Tracy Gantt

Co-Founder, Executive Director & Board Member

Pastor Tracy Gantt co-founded Tracy and Sunshine Gantt Ministries in 2015 alongside his wife, Sunshine. He serves as Executive Director of the organization and Senior Pastor of New Deliverance Church in Easley, South Carolina. Through his leadership, the ministry expanded its outreach efforts and opened Pickens County Shelter of Hope in 2020, becoming the first and only emergency and transitional housing program serving Pickens County. He provides spiritual leadership, program oversight, and strategic direction for the organization.

Sunshine Gantt

Co-Founder, Associate Director, Chief Financial Officer & Board Member

Sunshine Gantt co-founded Tracy and Sunshine Gantt Ministries in 2015 and serves as Associate Director and Chief Financial Officer. She oversees the organization's financial management, grant development, strategic partnerships, community relations, and day-to-day operations. Drawing from her own experiences with hardship and housing instability, Sunshine is passionate about helping individuals and families overcome barriers and rebuild their lives. Over the years, she has helped guide the ministry's growth while managing finances, organizational development, fundraising efforts, and community partnerships in support of the organization's mission.



CONTACT US

Mailing Address:
P.O. Box 223
Easley, SC 29641
Physical Address:

CONNECT WITH US

[Facebook \(Organization\)](#)
[Facebook \(PCSOH\)](#)
[Instagram \(PCSOH\)](#)

EMAIL US

info@tsministries.com

Gold
Transparency
2024

Candid.

Gold
Transparency
2025

Candid.

106 King Street
Easley, SC 29640
Shelter Phone:
864-507-3112

"For I was hungry and you gave me something to eat, I was thirsty and you gave me something to drink, I was a stranger and you invited me in, I needed clothes and you clothed me."

– Matthew 25:35-36

REGISTERED NONPROFIT NUMBER : 47-3704403

© 2026 by Tracy and Sunshine Gantt Ministries/Designed By Sunshine Gantt