

STATE OF SOUTH CAROLINA STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:
CASE NUMBER
C 2022-119

COMPLAINT FORM

COMPLAINANT: State Ethics Commission
ADDRESS: 201 Executive Center Drive
Suite 150
Columbia, SC 29210
TELEPHONE NUMBER: (803) 253-4192

RESPONDENT: Robert P. Jackson
ADDRESS: [REDACTED]
TELEPHONE NUMBER: [REDACTED]
TITLE: Council Member – Town of Smyrna

Section 8-13-1120, SC Code Ann., 1976, as amended, requires disclosure of the source, type, and amount of income from a governmental entity and a listing of the private source and type of any income received by the filer or a member of the filer's immediate family during the reporting period. Respondent has failed to report income on his 2020 Statement of Economic Interests.

Section 8-13-1140, SC Code Ann., 1976, as amended, requires the filing of an updated Statement of Economic Interests for the previous calendar year annually thereafter prior to March 30. Records in the State Ethics Commission indicate that the Respondent was required to file the 2022 Statement of Economic Interests.

Respondent was reminded of the filing requirement by letters dated December 2, 2021, December 31, 2021, and March 21, 2022 as described in the attached. To date, a properly completed 2020 Statement of Economic Interests has not been received. All in violation of Section 8-13-1120 and Section 8-13-1140, SC Code Ann., 1976, as amended.

If there is a finding of probable cause, the following documents become public record: the complaint, the response (if any) by respondent, and the notice of hearing. If a hearing is to be held, the final order and all exhibits become public record. If no hearing is held following a finding of probable cause, the final disposition of the matter becomes public record.

STATE OF SOUTH CAROLINA
COUNTY OF Richland

Personally appeared before me Meghan L. Walker who, first being duly sworn, says that she has read and knows the contents of the above complaint and that the allegations contained therein, are true and correct to the best of her own knowledge, except for those matters therein based upon information and belief, and as to those she believes them to be true.

Sworn to and subscribed before me this
21st day of September 2026

[REDACTED]
Meghan L. Walker, Executive Director

[REDACTED]
Notary Public for South Carolina
My Commission expires 01/22/26

SEC-7 (Revised 3/2022)

REPLY TO: 201 Executive Center Drive, Suite 150, Columbia, South Carolina 29210 (803)253-4192
ELECTRONIC COPIES WILL NOT BE ACCEPTED

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
Complaint C2022-119)
State Ethics Commission)
Complainant.)
Robert Jackson)
Respondent.)
_____)

BEFORE THE STATE ETHICS COMMISSION

NOTICE OF HEARING

The State Ethics Commission has determined that there is probable cause pursuant to Section 8-13-320(10)(i), Code of Laws, South Carolina, 1976, as amended, in the above-captioned complaint. The Commission will convene a formal hearing into the matter in accordance with Section 8-13-320(10)(i) & (j), Code of Laws, South Carolina, 1976, as amended, and State Ethics Commission Regulations, S.C. Code Ann. Regs. 52-707 (1997 Cum. Supp.) on Thursday, February 20, 2025 at 9:30 a.m. at the Commission Hearing Room located at: 201 Executive Center Drive, Suite 150, Columbia, South Carolina 29210.

The following allegations will be heard:

COUNT ONE
FAILURE TO FILE A STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Robert P. Jackson, Town of Smyrna Councilmember, did in Richland County, fail to file a 2022 Statement of Economic Interests (SEI), in violation of Section 8-13-1140.

COUNT TWO
FAILURE TO FILE A STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Robert P. Jackson, Town of Smyrna Councilmember, did in Richland County, fail to file a 2023 SEI, in violation of Section 8-13-1140.

COUNT THREE
FAILURE TO FILE A STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Robert P. Jackson, Town of Smyrna Councilmember, did in Richland County, fail to file a 2024 SEI, in violation of Section 8-13-1140.

You have the right to be represented by counsel, the right to call and examine witnesses, the right to introduce exhibits, and the right to cross-examine opposing witnesses. This hearing will be open to the public as required by Section 8-13-320(10)(j), Code of Laws, South Carolina, 1976, as amended. The procedures to be followed are set forth in the Administrative Procedures Act, Section 1-23-10, et seq., Code of Laws, South Carolina, 1976, as amended, the State Ethics Act, Section 8-13-100, et seq., Code of Laws, South Carolina, 1976, as amended, and State Ethics Commission Regulations, S.C. Code Ann. Regs. 52-707 (1997 Cum. Supp.).

A pre-hearing conference may be scheduled prior to the hearing to allow exchange of witness lists and evidence, marking of exhibits, and disposition of motions or pleadings. In the event you fail to appear, judgment by default will be rendered against you. If there are any questions concerning the above notice or hearing times, please contact the State Ethics Commission.



Meghan Walker Dayson, Executive Director
State Ethics Commission

Dated this 22nd day,
of July 2024.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the RESPONDENT Robert P. Jackson, 980 East Main Street, Smyrna, SC 29743 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 29th day of July 2024, by **CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED**, appropriate postage affixed, and a return address clearly indicated on said envelope.



Columbia, South Carolina

Rachael O'Bryan, Administrative Assistant

State Ethics Commission

(803) 253-4192

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
COMPLAINT C2022-119)
State Ethics Commission,)
Complainant,)
Robert P. Jackson,)
Respondent.)
_____)

BEFORE THE STATE ETHICS COMMISSION

CONSENT ORDER

This matter comes before the State Ethics Commission (Commission) by way of a Complaint filed on September 22, 2022. Pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act (Ethics Act), the Complaint against Robert P. Jackson (Respondent) was considered by the Commission and probable cause was found to warrant an evidentiary hearing. Prior to the call of the case, Respondent agreed to the following:

STATEMENTS OF FACT

1. Respondent has served on Smyrna Town (Town) Council (Council) since 2006.
2. Respondent failed to file his 2022 Statement of Economic Interests (SEI) on or before March 30, 2022.
3. On September 22, 2022, the Commission filed a Complaint alleging that Respondent failed to timely file his 2022 SEI and that he failed to report government income on his SEIs.¹
4. On October 3, 2022, Respondent filed his 2022 SEI and submitted the required \$100.00 late-filing penalty pursuant to Section 8-13-1510.
5. The Commission's investigation revealed that Respondent failed to file his 2023 and 2024 SEIs by March 30 of those years.

¹ The Complaint alleged that Respondent failed to file his 2022 SEI and failed to report private and government sources of income on his 2020 SEI. The Commission's investigation revealed Smyrna Councilmembers did not receive income for their public service. On April 29, 2024, Respondent amended his 2020 SEI to disclose his private sources of income. The Commission therefore found probable cause but waived further proceedings with regard to that allegation pursuant to Section 8-13-320(10)(i).

6. On April 10, 2024, Respondent filed SEIs for 2023 and 2024 with assistance from Commission staff and is now in compliance.

CONCLUSIONS OF LAW

Based upon the Statements of Fact, the Commission concludes, as a matter of law:

1. At all times relevant, Respondent was a “public official” pursuant to Section 8-13-100(27).

Therefore, the Commission has personal and subject matter jurisdiction.

2. Section 8-13-1140 provides, in relevant part:

A person required to file a [SEI] under this chapter annually shall file . . . an updated statement for the previous calendar year, no later than noon on March 30 . . .

3. Section 8-13-1510(A) provides, in relevant part:

. . . a person required to file a report or statement under this chapter who files a late statement or report . . . must be assessed a civil penalty as follows: (1) a fine of one hundred dollars if the statement or report is not filed within five days after the established deadline provided by law in this chapter. . . .

4. Section 8-13-130 allows the Commission to “levy an enforcement or administrative fee on a person who is in violation” of the Ethics Act.

DISCUSSION

The Commission found probable cause to charge Respondent with two (2) counts of violating Section 8-13-1140 for failing to timely file SEIs in 2023 and 2024.² Through this Consent Order, Respondent admits he violated the Ethics Act when he failed to timely file his 2023 and 2024 SEIs. In mitigation, Respondent states he relied on Francis Faulkner, a fellow Councilmember, to file his SEIs because she filed SEIs for each member of Council while she was in office. He further states that he does not have access to a computer, that the Town’s internet access is unreliable, and that he cannot

² The Commission also found probable cause to charge Respondent with failing to file his 2022 SEI, in violation of Section 8-13-1140. However, given that Respondent filed this SEI and paid the late-filing penalty of \$100.00 within ten (10) days from his receipt of the Commission’s certified letter, the Commission declines to proceed as to this count.

use the library because it is closed by the time he leaves work.

DISPOSITION

- 1. The Commission finds Respondent in violation of two (2) counts of 8-13-1140.
- 2. The Commission adopts the Statements of Fact, Conclusions of Law, Discussion, and Disposition as agreed upon by the Respondent.

THEREFORE, the Commission hereby issues this Public Reprimand and orders Respondent to pay the Commission, within six (6) months from receipt of this Order, a late-filing penalty of \$200.00 and an administrative fee of \$500.00, for a total of \$700.00.

By executing this Consent Order, Respondent understands that he is confessing to a judgment of \$700.00 in the event he does not make payment as provided for in this Order, in which case the Commission shall file a Judgment against Respondent with the County Clerk of Court in Respondent's last known County of residence, who shall enter this Order in the amount of \$700.00 (less any money paid) in its Judgment Rolls, without cost to the Commission.³

AND IT IS SO ORDERED THIS 26th DAY OF November 2024.

JEF

STATE ETHICS COMMISSION



SCOTT E. FRICK, CHAIR

Robert Jackson
ROBERT P. JACKSON
RESPONDENT

³ This Consent Order pertains to the violations discussed herein and has no bearing on Respondent's other instances of noncompliance.