

# STATE OF SOUTH CAROLINA STATE ETHICS COMMISSION

**FOR COMMISSION USE ONLY:**  
**CASE NUMBER**  
C 2022-132

## COMPLAINT FORM

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

**RESPONDENT:** Cindy B. Coats  
**ADDRESS:** [REDACTED]  
**TELEPHONE NUMBER:** [REDACTED]  
**TITLE:** Former Trustee – Charleston County  
District 3 Constituent Board and Candidate –  
Superintendent of Education

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 2019 and 2020 Statement of Economic Interests.

Section 8-13-1308, S.C. Code Ann., 1976, as amended, requires candidates to file Campaign Disclosures within ten (10) days of receiving or expending \$500; fifteen (15) days prior to each election; within ten (10) days of the end of each quarter; and a final report when the campaign account is closed. In addition, certified campaign reports detailing campaign contributions and expenditures must contain the total of contributions accepted, the name and address of each person making a contribution, the total expenditures made by or on behalf of the candidate or committee, and the name and address of each person to whom an expenditure is made from campaign funds. Pursuant to Section 8-13-1362 and Regulation 52-504 (C), the Pre-Election and quarterly report are required even when there have been no contributions or expenditures.

As a candidate for Superintendent of Education, an Initial Campaign Disclosure was due no later than April 8, 2022.

As a former Trustee, a Campaign Disclosure was due no later January 10, 2019, April 10, 2019, July 10, 2019, October 10, 2019, January 10, 2020, April 10, 2020, July 10, 2020, October 10, 2020, January 10, 2021, April 10, 2021, July 10, 2021, October 10, 2021, January 10, 2022, April 10, 2022, July 10, 2022, and October 10, 2022. Respondent was sent an email reminder thirty days before each Campaign Disclosure deadline.

Respondent was reminded of the Campaign Disclosure requirements by a certified letter dated May 5, 2022 as described in the attached. To date, a properly completed 2019 Statement of Economic Interests, 2020 Statement of Economic Interests, Initial, Quarter 4 2018, Quarter 1 2019, Quarter 2 2019, Quarter 3 2019, Quarter 4 2019, Quarter 1 2020, Quarter 2 2020, Quarter 3 2020, Quarter 4 2020, Quarter 1 2021, Quarter 2 2021, Quarter 3 2021, Quarter 4 2021, Quarter 1 2022, Quarter 2 2022, and Quarter 3 2022 Campaign Disclosure have not been received. All in violation of Section 8-13-1140, Section 8-13-1308(A), Section 8-13-1308 (B), and Section 8-13-1308 (F), S.C. 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  
19th day of October, 2022



Meghan L. Walker, Executive Director

  
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**

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STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )  
IN THE MATTER OF: )  
Complaint C2022-132 )  
State Ethics Commission )  
Complainant. )  
Cindy Bohn Coats )  
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 Cindy Bohn Coats, former Trustee for Charleston County Constituent School Bord – District 3, did in Richland County, fail to file a 2019 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 Cindy Bohn Coats, former Trustee for Charleston County Constituent School Bord –

District 3, did in Richland County, fail to file a 2020 SEI, in violation of Section 8-13-1140.

**COUNT TWO**  
**FAILURE TO OPEN A CAMPAIGN BANK ACCOUNT**  
**SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED**

That Cindy Bohn Coats, former Trustee for Charleston County Constituent School Board – District 3, did in Richland County, fail to open a campaign bank account at a financial institution with an office in South Carolina, in violation of Section 8-13-1312.

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 22<sup>nd</sup> 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 Cindy B. Coats, 7309 Kestrel Trail, Hanahan, SC 29410 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 31st day of July 2024, by **CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED**, appropriate postage affixed, and a return address clearly indicated on said envelope.



**Rachael O'Bryan, Administrative Assistant**  
State Ethics Commission (803) 253-4192

Columbia, South Carolina

|                          |   |                                    |
|--------------------------|---|------------------------------------|
| STATE OF SOUTH CAROLINA  | ) |                                    |
| COUNTY OF RICHLAND       | ) | BEFORE THE STATE ETHICS COMMISSION |
|                          | ) |                                    |
| IN THE MATTER OF:        | ) |                                    |
| COMPLAINT C2022-132      | ) |                                    |
|                          | ) |                                    |
| State Ethics Commission, | ) | <b>CONSENT ORDER</b>               |
| Complainant,             | ) |                                    |
|                          | ) |                                    |
| Cindy Bohn Coats         | ) |                                    |
| Respondent.              | ) |                                    |
| _____                    | ) |                                    |

This matter comes before the State Ethics Commission (Commission) by way of a Complaint filed on October 19, 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 Cindy Bohn Coats (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 served on the Charleston County Constituent District 3 School Board (School Board) from 2010 to 2022. Her final election to the School Board was November 6, 2018.
2. Respondent filed a 2018 Pre-Election Campaign Disclosure Report (CDR) disclosing that she received a \$250.00 contribution on October 12, 2018.
3. Respondent failed to file a Statement of Economic Interests (SEI) prior to March 30 in 2019 and 2020.
4. Following the filing of the Complaint, the Commission’s investigation revealed that Respondent did not maintain a campaign bank account for her 2018 election cycle and therefore did not deposit her contribution into a campaign bank account.
5. On May 31, 2023, Respondent filed her 2019 and 2020 SEIs 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 candidate pursuant to Section 8-13-1300(4) and 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 8-13-1312 provides, in relevant part:

. . . All contributions received by the candidate or committee, directly or indirectly, must be deposited in the campaign account by the candidate or committee within ten days after receipt. . . .

4. 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; . . .

5. 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.
6. Section 8-13-320(10)(l) allows the Commission to assess a \$2,000.00 civil penalty for violations of the Section 8-13-1370 of the Ethics Act and permits the Commission to require the forfeiture of any profits obtained in violation thereof.

### **DISCUSSION**

The Commission found probable cause to charge Respondent with two (2) counts of violating Section 8-13-1140 for failing to timely file 2019 and 2020 SEIs and one (1) count of

violating Section 8-13-1312 for failing to open a campaign bank account for her 2018 election cycle. Through this Consent Order, Respondent admits she violated the Ethics Act as outlined herein. In mitigation, Respondent states that her violations were unintentional. Specifically, Respondent states that her husband died from cancer in 2020 after being diagnosed in 2019 and that her memory of those years is a blur due to grieving her husband. Additionally, Respondent asserts that she does not recall why she did not open a campaign bank account for her 2018 election cycle and that she received only the one (1) contribution that she reported on her 2018 Pre-Election CDR.

#### **DISPOSITION**

1. The Commission finds Respondent in violation of two (2) counts of Section 8-13-1140 and one (1) count of Section 8-13-1312.
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 to Respondent and orders Respondent to pay the Commission, within nine (9) months from receipt of this Order, a late-filing penalty of \$200.00 (\$100.00 per SEI) and an administrative fee of \$550.00, for a total of \$750.00. The Commission declines to assess a civil penalty with regard to Section 8-13-1312 given the mitigation herein.

[REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

By executing this Consent Order, Respondent understands that she is not only admitting to a violation of the Ethics Act, but also confessing to a judgment of \$750.00 in the event she 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 \$750.00 (less any money paid) in its Judgment Rolls, without cost to the Commission.

AND IT IS SO ORDERED THIS 16<sup>th</sup> DAY OF January 2024.

STATE ETHICS COMMISSION



SCOTT E. FRICK, CHAIR

Signed by:  
*Cindy Bohn Coats*  
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CINDY BOHN COATS  
RESPONDENT