

STATE OF SOUTH CAROLINA  
STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:  
CASE NUMBER  
C 2022-168

COMPLAINT FORM

COMPLAINANT: State Ethics Commission  
ADDRESS: 201 Executive Center Drive  
Suite 150  
Columbia, SC 29210

RESPONDENT: Justin Anderson  
ADDRESS: P.O. Box 444  
Saluda, SC 29138

TELEPHONE NUMBER: (803) 253-4192

TELEPHONE NUMBER: [REDACTED]  
TITLE: Council Member – Saluda County

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, 2020, 2021, and 2022 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. Records of the State Ethics Commission indicate that a Campaign Disclosure was due no later than 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 from April 2019 through October 2021 and was sent an email reminder thirty days before and ten days before each Campaign Disclosure deadline after October 2021.

Respondent was reminded of the filing requirements by letters dated March 7, 2022, March 30, 2022, April 29, 2022, and September 15, 2022 as described in the attached. To date, a properly completed 2019 Statement of Economic Interests, 2020 Statement of Economic Interests, 2021 Statement of Economic Interests, 2022 Statement of Economic Interests, 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, or Quarter 3 2022 Campaign Disclosure has not been received. All in violation of Section 8-13-1140, 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 29th day of December, 2022

[REDACTED]

[REDACTED]  
Meghan L. Walker, Executive Director

Notary Public for South Carolina  
My Commission expires 01/27/25

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 ) BEFORE THE STATE ETHICS COMMISSION  
) )  
IN THE MATTER OF: ) )  
) )  
Complaint C2022-168 ) )  
) )  
State Ethics Commission ) **NOTICE OF HEARING**  
Complainant. ) )  
) )  
Justin Anderson ) )  
Respondent. ) )  
\_\_\_\_\_ )

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, April 18, 2024 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 PRE-ELECTION CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(A), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a 2021 Pre-Election Campaign Disclosure Report (CDR), in violation of Section 8-13-1308(A).

**COUNT TWO**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a Quarter 1 2019 CDR, in violation of Section 8-13-1308(B).

**COUNT THREE**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a Quarter 2 2019 CDR, in violation of Section 8-13-1308(B).

**COUNT FOUR**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a Quarter 3 2019 CDR, in violation of Section 8-13-1308(B).

**COUNT FIVE**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a Quarter 4 2019 CDR, in violation of Section 8-13-1308(B).

**COUNT SIX**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a Quarter 1 2020 CDR, in violation of Section 8-13-1308(B).

**COUNT SEVEN**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a Quarter 2 2020 CDR, in violation of Section 8-13-1308(B).

**COUNT EIGHT**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file

a Quarter 3 2020 CDR, in violation of Section 8-13-1308(B).

**COUNT NINE**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file  
a Quarter 4 2020 CDR, in violation of Section 8-13-1308(B).

**COUNT TEN**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file  
a Quarter 1 2021 CDR, in violation of Section 8-13-1308(B).

**COUNT ELEVEN**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file  
a Quarter 2 2021 CDR, in violation of Section 8-13-1308(B).

**COUNT TWELVE**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file  
a Quarter 3 2021 CDR, in violation of Section 8-13-1308(B).

**COUNT THIRTEEN**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file  
a Quarter 4 2021 CDR, in violation of Section 8-13-1308(B).

**COUNT FOURTEEN**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a Quarter 1 2022 CDR, in violation of Section 8-13-1308(B).

**COUNT FIFTEEN**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a Quarter 2 2022 CDR, in violation of Section 8-13-1308(B).

**COUNT SIXTEEN**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a Quarter 3 2022 CDR, in violation of Section 8-13-1308(B).

**COUNT SEVENTEEN**  
**FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a Quarter 4 2022/Final CDR, in violation of Section 8-13-1308(B).

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

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a 2019 Statement of Economic Interests (SEI), in violation of Section 8-13-1140.

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

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a 2020 SEI, in violation of Section 8-13-1140.

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

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a 2021 SEI, in violation of Section 8-13-1140.

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

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a 2022 SEI, in violation of Section 8-13-1140.

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

That Justin Anderson, Saluda County Councilmember, did in Richland County, fail to file a 2023 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 27<sup>th</sup> day,  
of July 2023.

*Certificate of Service by Certified Mail*

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the RESPONDENT Justin Anderson, P.O. Box 444, Saluda, SC 29138 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 2nd day of August 2023, 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 C2022-168 )  
 )  
 State Ethics Commission, )  
 Complainant, )  
 )  
 Justin Anderson, )  
 Respondent. )  
 \_\_\_\_\_ )

BEFORE THE STATE ETHICS COMMISSION

**CONSENT ORDER**

This matter comes before the State Ethics Commission (Commission) by way of a Complaint filed on December 29, 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 Justin Anderson (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 was a successful candidate for Saluda County Council in a November 6, 2018 election and in a November 8, 2022 election.
2. As a candidate in the November 6, 2018 election, Respondent timely filed a 2018 Statement of Economic Interests (SEI). Respondent thereafter failed to file any additional SEIs.
3. Prior to the filing of the Complaint, Respondent's most recently filed Campaign Disclosure Report (CDR) was a Quarter 4 2018 CDR filed on December 12, 2018 showing a balance of \$528.00 in contributions. Respondent thereafter failed to file any additional quarterly CDRs or a Pre-Election CDR prior to the November 8, 2022 election.
4. In a March 30, 2022 certified letter, the Commission notified Respondent of his failure to timely file eleven (11) CDRs from Quarter 1 2019 through Quarter 4, 2021.<sup>1</sup> The letter also notified Respondent of his failure to file 2019, 2020, and 2021 SEIs.

---

<sup>1</sup> Although Respondent also failed to file a Quarter 4 2019 CDR, the letter inadvertently omitted this report.

5. According to the United States Postal Service (USPS), the certified letter was picked up from the Post Office on April 14, 2022 at 9:26 a.m.
6. On April 24, 2022, late-filing penalties began to accrue at \$10.00 per day for each report outlined in the Commission's March 30, 2022 letter.
7. On May 4, 2022, late-filing penalties began to accrue at \$100.00 per day for each report outlined in the Commission's March 30, 2022 letter.
8. In an additional certified letter dated April 29, 2022, the Commission notified Respondent of his failure to timely file a Quarter 1 2022 CDR and a 2022 SEI.
9. On June 3, 2022, the April 29, 2022 certified letter was returned to the Commission as "Unclaimed." This letter was subsequently remailed via first-class mail with a USPS tracking number on September 15, 2022 and was delivered to Respondent's post office box on September 17, 2022 at 9:02 a.m.
10. On September 27, 2022, late-filing penalties began to accrue at \$10.00 per day for each report outlined in the Commission's April 29, 2022 letter.
11. On October 7, 2022, late-filing penalties began to accrue at \$100.00 per day for each report outlined in the Commission's April 29, 2022 letter.
12. During the Commission investigation, a review of Respondent's campaign bank account records revealed Respondent's campaign bank account remained dormant following his November 6, 2018 election except for bank fees. The records further revealed Respondent's campaign bank account was closed on December 31, 2022.
13. On June 5, 2023, following contact from a Commission Investigator, Respondent came into compliance by filing his 2019, 2020, 2021, 2022, and 2023 SEIs. Respondent also filed the aforementioned CDRs and the 2022 Pre-Election CDR.

### 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 8-13-1308 provides, in relevant part:

(A) Upon receipt or expenditure of campaign contributions or the making of independent expenditures totaling an accumulated aggregate of five hundred dollars or more, a candidate . . . must file an initial certified campaign report within ten days of these initial receipts or expenditures. However, a candidate who does not receive or expend campaign contributions totaling an accumulated aggregate of five hundred dollars or more must file an initial certified campaign report fifteen days before an election.

(B) Following the filing of an initial certified campaign report, additional certified campaign reports must be filed within ten days following the end of each calendar quarter in which contributions are received or expenditures are made, whether before or after an election until the campaign account undergoes final disbursement pursuant to the provisions of Section 8-13-1370.

...

(D)(1) At least fifteen days before an election, a certified campaign report must be filed showing contributions of more than one hundred dollars and expenditures to or by the candidate for the period ending twenty days before the election.

3. 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 . . .

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; and (2) after notice has been given by certified or registered mail that a required statement or report has not been filed, a fine of ten dollars per calendar day for the first ten days after notice has been given, and one hundred dollars for each additional calendar day in which the required statement or report is not filed, not exceeding five thousand dollars.

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.

### **DISCUSSION**

The Commission found probable cause to charge Respondent with five (5) counts of violating 8-13-1140 for failing to timely file SEIs in 2019, 2020, 2021, 2022, and 2023; sixteen (16) counts of violating 8-13-1308(B) for failing to timely file CDRs from Quarter 1 2019 through Quarter 4 2022; and one (1) count of violating of Section 8-13-1308(A) for failing to timely file a 2022 Pre-Election CDR. Through this Consent Order, Respondent admits he violated the Ethics Act as described herein. Respondent states 2018 was his first run for public office and he did not understand that he was required to file CDRs after the conclusion of the election. Respondent further states that his campaign bank account remained dormant after the 2018 election except for bank fees, which he has now disclosed. Respondent further states that he did not raise or spend any money in conjunction with his 2022 election and believed that he was therefore not required to file any CDRs. Respondent states he only knew about CDRs during the 2018 election cycle because he was told about them by a former Council member. Respondent further states he was unaware that he was required to continue filing annual SEIs following the one he filed as a candidate.

### **DISPOSITION**

1. The Commission finds Respondent in violation of five (5) counts of 8-13-1140, sixteen (16) counts of 8-13-1308(B), and one (1) count of Section 8-13-1308(A).
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 one (1) year from receipt of this Order, a reduced late-filing penalty of \$700.00 and an administrative fee of \$300.00, for a total of \$1,000.00. The Commission declines to

assess any accrued late-filing penalties.

By executing this Consent Order, Respondent understands that he is confessing to a judgment of \$1,000.00 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 \$1,000.00 (less any money paid) in its Judgment Rolls, without cost to the Commission

AND IT IS SO ORDERED THIS 9<sup>th</sup> DAY OF February 2023.



JUSTIN ANDERSON  
RESPONDENT

STATE ETHICS COMMISSION



SCOTT E. FRICK, CHAIR