

STATE OF SOUTH CAROLINA  
STATE ETHICS COMMISSION

STATE ETHICS COMMISSION  
RECEIVED JAN 13 '23 AM 9:10:4

FOR COMMISSION USE ONLY:  
CASE NUMBER  
C 2023-004

COMPLAINT FORM

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

RESPONDENT: John P. Wilson, III  
ADDRESS: [REDACTED]  
TELEPHONE NUMBER: [REDACTED]  
TITLE: Former Trustee – Georgetown County School Board

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 April 10, 2019, January 10, 2020, January 10, 2021, April 10, 2021, July 10, 2021, October 10, 2021, January 10, 2022, April 10, 2022, July 10, 2022, October 10, 2022, and January 10, 2023. In addition, a Quarter 3 2020/Pre-Election Campaign Disclosure was due between October 14, 2020 and October 19, 2020. Respondent was sent an email reminder thirty days before each quarterly Campaign Disclosure deadline.

Respondent was reminded of the filing requirements by a certified letter dated May 17, 2022 as described in the attached. To date, a properly completed Quarter 1 2019, Quarter 4 2019, Quarter 3 2020/Pre-Election, Quarter 4 2020, Quarter 1 2021, Quarter 2, 2021, Quarter 3 2021, Quarter 4 2021, Quarter 1 2022, Quarter 2 2022, Quarter 3 2022, or Quarter 4 2022 Campaign Disclosure have not been received. All in violation of Section 8-13-1308(A), Section 8-13-1308(B), Section 8-13-1308(D)(1), 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 13th day of January, 2023

[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	)	BEFORE THE STATE ETHICS COMMISSION
	)	
IN THE MATTER OF:	)	
	)	
Complaint C2023-004	)	
	)	
State Ethics Commission	)	<b>NOTICE OF HEARING</b>
Complainant.	)	
	)	
John P. Wilson, III	)	
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, August 15, 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 CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308, S.C. CODE ANN., 1976, AS AMENDED**

That John P. Wilson, III, former Georgetown County School Board Trustee, did in Richland County, fail to file a 2019 Quarter 1 Campaign Disclosure Report (CDR), in violation of Section 8-13-1308.

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

That John P. Wilson, III, former Georgetown County School Board Trustee, did in

Richland County, fail to file a 2019 Quarter 3 CDR, in violation of Section 8-13-1308.

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

That John P. Wilson, III, former Georgetown County School Board Trustee, did in Richland County, fail to file a 2019 Quarter 4 CDR, in violation of Section 8-13-1308.

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

That John P. Wilson, III, former Georgetown County School Board Trustee, did in Richland County, fail to file a 2020 Quarter 3/Pre-Election CDR, in violation of Section 8-13-1308.

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

That John P. Wilson, III, former Georgetown County School Board Trustee, did in Richland County, fail to file a 2020 Quarter 4/Final CDR, in violation of Section 8-13-1308.

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.

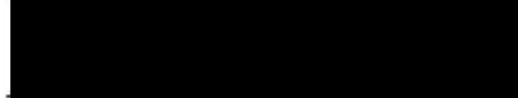


Meghan Walker Dayson, Executive Director  
State Ethics Commission

Dated this 28<sup>th</sup> day,  
of March 2024.

**Certificate of Service by Certified Mail**

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the RESPONDENT John P. Wilson, III, 245 Francis Marion Drive, Georgetown, SC 29440 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 29<sup>th</sup> day of March 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

Columbia, South Carolina

(803) 253-4192

STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )  
IN THE MATTER OF: )  
COMPLAINT C2023-004 )  
State Ethics Commission, )  
Complainant, )  
John P. Wilson, III, )  
Respondent. )

BEFORE THE STATE ETHICS COMMISSION

**CONSENT ORDER**

This matter comes before the State Ethics Commission (Commission) by way of a Complaint filed on January 13, 2023. Pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act (Ethics Act), the Complaint against John P. Wilson, III (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 an unsuccessful candidate for Georgetown County School Board in a November 6, 2018 election and a November 3, 2020 election.
2. In conjunction with these elections, Respondent timely filed multiple quarterly Campaign Disclosure Reports (CDRs) with the Commission. However, Respondent did not timely file the following CDRs: 2019 Quarter 1; 2019 Quarter 3; 2019 Quarter 4; and 2020 Quarter 3/Pre-Election.
3. In a May 17, 2022 certified letter, the Commission notified Respondent of his failure to timely file the aforementioned CDRs.
4. According to the United States Postal Service (USPS), the certified letter was delivered to Respondent's address of record on May 23, 2022 at 9:19 a.m.
5. On June 2, 2022, late-filing penalties began to accrue at \$50.00 per day (\$10.00 per CDR).
6. On June 12, 2022, late-filing penalties began to accrue at \$500.00 per day \$100.00 per CDR)..

7. 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 reached a zero balance on July 31, 2020. At all times relevant, Respondent's campaign bank account contained less than \$50.00.
8. Following contact from a Commission Investigator, Respondent came into compliance by filing the requisite CDRs.

### 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). 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 8-13-1510(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.

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 four (4) counts of violating Section 8-13-1308 for failing to timely file the aforementioned CDRs.<sup>1</sup> Through this Consent Order, Respondent admits he failed to timely file the CDRs. In mitigation, Respondent states that, following the 2018 election, he and his spouse were responsible for caring for his mother-in-law as she underwent dialysis and that this caused him to neglect his filing responsibilities. Respondent further states that although he signed up to run in the 2020 election, he withdrew his name shortly thereafter to focus on caring for his mother-in-law. Respondent states that following his mother-in-law’s death, he was partially responsible for administering her estate, which further caused him to neglect his filing responsibilities. Respondent states it was not his intention to mislead or conceal anything from the Commission or the public. Respondent states that he was not raising or spending any money during the relevant time period and that his campaign bank account maintained less than \$50.00 throughout that time.

### **DISPOSITION**

1. The Commission finds Respondent in violation of four (4) counts of 8-13-1308.
2. The Commission adopts the Statements of Fact, Conclusions of Law, Discussion, and Disposition

---

<sup>1</sup> The Commission also found probable cause to believe Respondent violated Section 8-13-1308 when he failed to timely file a 2020 Quarter 4/Final CDR. However, this finding was in error and Respondent’s last required filing, based on his campaign bank account activity, was the 2020 Quarter 3/Pre-Election CDR. Accordingly, the Commission declines to proceed on Count Five (5) as outlined in the Notice of Hearing.


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 \$400.00 and an administrative fee of \$300.00, for a total of \$700.00. The Commission declines to assess any accrued late-filing penalties given Respondent's mitigating circumstances.

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

AND IT IS SO ORDERED THIS 27<sup>th</sup> DAY OF October 2024.

STATE ETHICS COMMISSION

  
SCOTT E. FRICK, CHAIR

  
JOHN P. WILSON, III  
RESPONDENT