

STATE OF SOUTH CAROLINA  
STATE ETHICS COMMISSION

STATE ETHICS COMMISSION  
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FOR COMMISSION USE ONLY:  
CASE NUMBER  
C 2023-049

COMPLAINT FORM

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

RESPONDENT: Melinda Starnes  
ADDRESS: [REDACTED]  
TELEPHONE NUMBER: [REDACTED]  
TITLE: Candidate - Aiken County Council, District 1

Section 8-13-1302 of the South Carolina Code Ann., requires that all candidates maintain a record of campaign contributions, expenditures, all receipted bills, canceled checks, or other proof of payment for each expenditure and the occupation of each person making a contribution for a period of four years. South Carolina Code of Regulations, Reg. 52-501.D requires that campaign records must be made available to the State Ethics Commission upon request. The Respondent did not properly report the occupation of two contributors on the Pre-Election Campaign Disclosure.

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 July 10, 2022, October 10, 2022, January 10, 2023, and April 10, 2023. Respondent was sent an email reminder thirty days before and ten days before each Campaign Disclosure deadline.

Respondent was reminded of the filing requirement by letters dated June 20, 2022 and August 5, 2022 as described in the attached. To date, properly completed Quarter 2 2022, Quarter 3 2022, Quarter 4 2022, and Quarter 1 2023 Campaign Disclosures have not been received. All in violation of Section 8-13-1302, 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 Walker Dayson 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  
12<sup>th</sup> day of April, 2023

[REDACTED]  
Meghan Walker Dayson, 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 C2023-049	)	
	)	
State Ethics Commission	)	<b>NOTICE OF HEARING</b>
Complainant.	)	
	)	
Melinda Starnes	)	
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, October 16, 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 CAMPAIGN DISCLOSURE REPORT**  
**SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED**

That Melinda Starnes, candidate for Aiken County Council – District 1, did in Richland County, fail to file a 2022 Quarter 2 Campaign Disclosure Report (CDR), in violation of Section 8-13-1308(B).

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

That Melinda Starnes, candidate for Aiken County Council – District 1, did in Richland

County, fail to file a 2022 Quarter 3 CDR, in violation of Section 8-13-1308(B).

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

That Melinda Starnes, candidate for Aiken County Council – District 1, did in Richland County, fail to file a 2022 Quarter 4/Final CDR, in violation of Section 8-13-1308(B).

**COUNT FOUR**  
**FAILURE TO MAKE EXPENDITURE THROUGH CAMPAIGN BANK ACCOUNT**  
**SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED**

That Melinda Starnes, candidate for Aiken County Council – District 1, did in Richland County, fail to make two (2) campaign expenditures through a campaign bank account, in violation of Section 8-13-1312.

**COUNT FIVE**  
**ACCEPTING CASH CONTRIBUTIONS OVER STATUTORY LIMIT**  
**SECTION 8-13-1314(A)(2), S.C. CODE ANN., 1976, AS AMENDED**

That Melinda Starnes, candidate for Aiken County Council – District 1, did in Richland County, accept eleven (11) cash contributions exceeding \$25.00 each, totaling \$2,482.00, in violation of Section 8-13-1314(A)(2).

**COUNT SIX**  
**USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSES**  
**SECTION 8-13-1348(A), S.C. CODE ANN., 1976, AS AMENDED**

That Melinda Starnes, candidate for Aiken County Council – District 1, did in Richland County, use \$10.91 of campaign funds to for two (2) personal purchases, in violation of Section 8-13-1348(A).

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 21<sup>st</sup> day,  
of May 2025.

*Certificate of Service by Certified Mail*

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the RESPONDENT 354 Crossthorn Road, Salley, SC 29137 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 10<sup>th</sup> day of June 2025, by **CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED**, appropriate postage affixed, and a return address clearly indicated on said envelope.



**Rachael O'Bryan, Administrative Assistant**

Columbia, South Carolina

State Ethics Commission

(803) 253-4192

STATE ETHICS COMMISSION  
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STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )  
IN THE MATTER OF: )  
COMPLAINT C2023-049 )  
State Ethics Commission, )  
Complainant, )  
Melinda Starnes, )  
Respondent. )

BEFORE THE STATE ETHICS COMMISSION

**CONSENT ORDER**

This matter comes before the State Ethics Commission (Commission) by way of a Complaint filed on April 12, 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 Melinda Starnes (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 Aiken County Council in a June 14, 2022 primary election.
2. Prior to the filing of the Complaint, Respondent's most recently filed Campaign Disclosure Report (CDR) was a 2022 Pre-Election CDR filed on May 31, 2022. Respondent's Pre-Election CDR reflected a negative balance of \$173.07 in contributions. Respondent thereafter failed to file any additional CDRs.
3. In an August 5, 2022 certified letter, the Commission notified Respondent of her failure to file a Quarter 2 2022 CDR.
4. According to the United States Postal Service (USPS), the certified letter was delivered to Respondent's address of record at P.O. Box 431 in Salley, South Carolina on August 15, 2022. Respondent signed for the certified letter.
5. On August 25, 2022, late-filing penalties began to accrue at \$10.00 per day.

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6. On September 4, 2022, late-filing penalties began to accrue at \$100.00 per day.
7. Following the filing of the Complaint, Respondent's campaign bank account records were subpoenaed and compared to Respondent's CDRs, revealing the following:
  - a. Respondent accepted eleven (11) cash contributions totaling \$2,482.00.
  - b. Respondent made the following campaign expenditures from a personal bank account:
    - i. \$50.00 to Digital Billboard on April 1, 2022
    - ii. \$25.65 to Dollar General on May 13, 2022
  - c. Respondent spent \$10.91 in campaign funds on personal items as follows:
    - i. \$3.51 to Piggly Wiggly on July 19, 2022
    - ii. \$7.40 to Groucho's on July 20, 2022
  - d. Respondent's campaign bank account closed on October 3, 2022, with a negative balance of -\$2.37.
8. During the Commission investigation, Respondent met with Commission Investigators and identified the cash contributors.
9. On May 14, 2025, Respondent received assistance from Commission staff with filing a Quarter 2 2022 CDR, a Quarter 3 2022 CDR, and a Quarter 4 2022 CDR. Respondent made the necessary disclosures therein.

#### **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. Because her campaign bank account closed on October 3, 2022, Respondent was required to file a Quarter 2 2022 CDR, a Quarter 3 CDR and a Quarter 4 2022 CDR pursuant to Section 8-13-1308(B), which provides, in relevant part:

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

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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.

3. Respondent was prohibited from accepting the eleven (11) cash contributions totaling \$2,482.00 pursuant to Section 8-13-1314(A), which provides, in relevant part:

Within an election cycle, a candidate or anyone acting on his behalf shall not solicit or accept, and a person shall not give or offer to give to a candidate or person acting on the candidate's behalf: . . . (2) a cash contribution from an individual unless the cash contribution does not exceed twenty-five dollars and is accompanied by a record of the amount of the contribution and the name and address of the contributor.

4. Respondent's expenditures to Groucho's and Piggly Wiggly were prohibited pursuant to Section 8-13-1348(A), which provides, in relevant part:

No candidate, committee, public official, or political party may use campaign funds to defray personal expenses which are unrelated to the campaign or the office if the candidate is an office holder nor may these funds be converted to personal use.

5. Respondent was prohibited from using her personal bank account to make the campaign expenditures to Digital Billboard and Dollar General pursuant to Section 8-13-1312, which provides, in relevant part:

Except as otherwise provided under Section 8-13-1348(C), expenses paid on behalf of a candidate or committee must be drawn from the campaign account and issued on a check signed by the candidate or a duly authorized officer of a committee. . . .

6. In accordance with Section 8-13-1510(A), Respondent has accrued \$5,200.00 in late-filing penalties (\$5,000.00 for the Quarter 2 2022 CDR, \$100.00 for the Quarter 3 2022 CDR, and \$100.00 for the Quarter 4 2022 CDR):

. . . 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.

7. Section 8-13-130 allows the Commission to "levy an enforcement or administrative fee on a person

*Handwritten signature and number 3*

who is in violation” of the Ethics Act.

8. Section 8-13-320(10)(l) allows the Commission to assess a \$2,000.00 civil penalty for violations 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 three (3) counts of Section 8-13-1308(B) for failing to file a Quarter 2 2022 CDR, a Quarter 3 2022 CDR, and a Quarter 4/Final 2022 CDR; one (1) count of Section 8-13-1312 for failing to make two (2) campaign expenditures through her campaign bank account; one (1) count of Section 8-13-1314(A)(2) for acceptance of cash contributions exceeding \$25.00; and one (1) count of Section 8-13-1348(A) for using \$10.91 in campaign funds for personal purchases.<sup>1</sup> Through this Consent Order, Respondent acknowledges she violated the Ethics Act in each of these instances.

In mitigation, Respondent states that 2022 was her first and last time running for public office. Respondent states that she did some research when she signed up to run for office and believed she was following the rules throughout her campaign. Respondent states she was not trying to hide anything from the public or the Commission. Respondent states she does not recall receiving the Commission’s August 5, 2022 certified letter, but does not dispute that she may have received it. Respondent states she has suffered from several health issues since 2023 that have resulted in difficulty recalling prior events and articulating certain words. Respondent states that it was not her intent to deceive the Commission or the public.

### **DISPOSITION**

1. The Commission finds Respondent in violation of three (3) counts of Section 8-13-1308(B), one

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<sup>1</sup> The Commission also found probable cause to believe Respondent failed to disclose a number of contributions and expenditures in violation of Section 8-13-1308(F). However, given that Respondent has since disclosed this information, the Commission declines to proceed on these charges.

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(1) count of Section 8-13-1312, one (1) count of Section 8-13-1314(A)(2), and one (1) count of Section 8-13-1348(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 nine (9) months from receipt of this Order, a reduced late-filing penalty of \$600.00 (\$400.00 for the Quarter 2 2022 CDR, \$100.00 for the Quarter 3 2022 CDR, and \$100.00 for the Quarter 4 2022 CDR) and an administrative fee of \$600.00, for a total of \$1,200.00. The Commission further orders Respondent to pay \$10.91 to the Children's Trust Fund and to provide proof of such payment to the Commission within nine (9) months from her receipt of this Order. The Commission declines to assess a civil penalty for the violations of Section 8-13-1314 and Section 8-13-1348 given the mitigation referenced herein.

By executing this Consent Order, Respondent understands that she is confessing to a judgment of \$1,210.91 if 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 \$1,210.91 (less any money paid) in its Judgment Rolls, without cost to the Commission.

AND IT IS SO ORDERED THIS 1st DAY OF October 2025.

STATE ETHICS COMMISSION



Signed by:  
  
MELINDA STARNES  
RESPONDENT