

STATE OF SOUTH CAROLINA
STATE ETHICS COMMISSION

STATE ETHICS COMMISSION
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FOR COMMISSION USE ONLY:

CASE NUMBER
C 2024-004

COMPLAINT FORM

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

RESPONDENT: Tilatha J. Moore
ADDRESS: [REDACTED]
TELEPHONE NUMBER: [REDACTED]
TITLE: Candidate – Edgefield County School
District Trustee

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, including the date, amount, purpose, and beneficiary of the expenditure. Respondent failed to disclose the full address and purpose of an expenditure to Office Depot, the complete address of an expenditure to Circle K, and the complete address of a contribution from Elvalimer Tanks.

Section 8-13-1348 of the South Carolina Code of laws, 1976, as amended, prohibits a candidate from using campaign funds to defray personal expenses which are unrelated to the campaign. According to the Quarter 4 2021 and Pre-Election Campaign Disclosure, the Respondent made an expenditure to Circle K in the amount of \$20.09. The Respondent was instructed to provide a mileage log in connection with campaign travel and reimburse the campaign account from personal funds or donate to the Children's Trust Fund or a 501 (C)(3) if the campaign account is closed.

To date, the Respondent has not provided a mileage log, reimbursed the campaign account, or provided proof of a donation all in violation of Section 8-13-1348, SC Code Ann., 1976, as amended.

Respondent was reminded of the filing requirements by letters dated August 22, 2022 and October 5, 2022 as described in the attached. All in violation of Section 8-13-1308 and Section 8-13-1348, 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 8th day of January, 2024

[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

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STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
Complaint C2024-004)
State Ethics Commission)
Complainant.)
Tilatha J. Moore)
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, April 17, 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 MAINTAIN CAMPAIGN RECORDS
SECTION 8-13-1302, S.C. CODE ANN., 1976, AS AMENDED

That Tilatha J. Moore, candidate for Edgefield School Board District 2, did in Richland County, fail to maintain campaign records related to an expenditure to purchase of flyers, in violation of Section 8-13-1302.

COUNT TWO
FAILURE TO MAINTAIN CAMPAIGN RECORDS
SECTION 8-13-1302, S.C. CODE ANN., 1976, AS AMENDED

That Tilatha J. Moore, candidate for Edgefield School Board District 2, did in Richland

County, fail to maintain campaign records related to an expenditure to purchase of fuel, in violation of Section 8-13-1302.

COUNT THREE
FAILURE TO REPORT PURPOSE OF CAMPAIGN EXPENDITURE
SECTION 8-13-1308(F)(4), S.C. CODE ANN., 1976, AS AMENDED

That Tilatha J. Moore, candidate for Edgefield School Board District 2, did in Richland County, fail to disclose the purpose of a campaign expenditure, in violation of Section 8-13-1308(F)(4).

COUNT FOUR
FAILURE TO OPEN A CAMPAIGN BANK ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Tilatha J. Moore, candidate for Edgefield School Board District 2, did in Richland County, fail to open a campaign bank account, in violation of Section 8-13-1312.

COUNT FIVE
FAILURE TO MAKE EXPENDITURES THROUGH
A CAMPAIGN BANK ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Tilatha J. Moore, candidate for Edgefield School Board District 2, did in Richland County, fail to make campaign expenditures through a campaign bank account, 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 19th day,
of September 2024.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the **RESPONDENT** Tilatha J. Moore, 613 Airport Road, Trenton, SC 29847 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 23rd day of September 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)
)
 IN THE MATTER OF:)
 COMPLAINT C2024-004)
)
 State Ethics Commission,)
 Complainant,)
)
 Tilatha J. Moore,)
 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 8, 2024. Pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act (Ethics Act), the Complaint against Tilatha J. Moore (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 Edgefield School Board District 2 in a January 22, 2022 special election.
2. On January 27, 2022, Respondent filed a Pre-Election Campaign Disclosure Report (CDR) showing no contributions or expenditures.¹ Respondent amended the filing on January 28, 2022 to disclose a \$20.13 expenditure for “Gas from Circle K” and a \$20.09 expenditure for “Office Depot.”
3. On August 4, 2024, following the filing of the Complaint, Respondent informed a Commission investigator via telephone that the expenditure to Office Depot was for campaign flyers, the

¹ Respondent was separately penalized for her failure to timely file her 2022 Pre-Election CDR. The late-filing penalty for this report is being handled by the Commission’s standard non-compliance process and is not impacted by the disposition of this Complaint.

expenditure to Circle K was for fuel used to acquire and distribute the campaign flyers, and that she did not maintain receipts or a mileage log.

4. The Commission's investigation revealed that Respondent did not open a campaign bank account and, accordingly, did not process expenditures through a campaign bank account.

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) of the Ethics Act. Therefore, the Commission has personal and subject matter jurisdiction.
2. Section 8-13-1302(A)(5) provides that a candidate must maintain and preserve an account of "all receipted bills, canceled checks, or other proof of payment for each expenditure;"
3. Section 8-13-1312 provides, in relevant part:

. . . 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. 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. All contributions received by an agent of a candidate or committee within must be forwarded to the candidate or committee not later than five days after receipt . . .

4. Section 8-13-320(10)(l) allows the Commission to issue a civil penalty of up to \$2,000.00 for each violation of the Ethics Act.
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 one (1) count of violating Section 8-13-1302 for failing to maintain campaign records for an expenditure for campaign flyers to Office Depot, one (1) count of violating Section 8-13-1302 for failing to

maintain campaign records for the purchase of fuel from Circle K, one (1) count of violating Section 8-13-1312 for failing to open a campaign account, and one (1) count of violating Section 8-13-1312 for failing to make campaign expenditures through a campaign bank account.²

Through this Consent Order, Respondent acknowledges she violated the Ethics Act as described herein. In mitigation, Respondent states that this was her first run for office and that she was confused and overwhelmed with all of the requirements. Additionally, Respondent states that she amended her reports shortly after speaking with the Commission's investigator. Respondent further asserts that she believed she did not need to open a campaign bank account because she received minimal contributions to her campaign. The Commission acknowledges that Respondent's total campaign contributions consisted of a personal contribution of \$10.22 and an outside contribution of \$30.00.

DISPOSITION

1. The Commission hereby finds Respondent in violation of the Ethics Act as set forth herein.
2. The Commission hereby adopts the Statements of Fact, Conclusions of Law, Discussion, and Disposition as agreed upon by the Respondent.

THEREFORE, the Commission hereby issues a Public Reprimand and orders the Respondent to pay the Commission, within twelve (12) months from receipt of this Order, an administrative fee of \$550.00. The Commission declines to assess a civil penalty given the mitigation herein.

The Commission further orders Respondent to pay \$20.13, the amount expended for fuel,

² The Commission also found probable cause to charge Respondent with one (1) count of violating Section 8-13-1308(F)(4) for failing to report the purpose of campaign expenditures. However, as Respondent has since disclosed the purpose of her expenditures, the Commission declines to proceed as to this count.

to the Children's Trust Fund and to provide proof of such payment to the Commission within twelve (12) months from receipt of this Order. Should the Respondent fail to remit proof of payment as described herein, the Commission shall assess a reduced civil penalty of \$200.00 for her violations of Sections 8-13-1302 and 8-13-1312.

By executing this Consent Order, Respondent understands that she is not only admitting to violations of the Ethics Act, but also confessing to a judgment of \$750.00 (less any money paid to the Commission) in the event she does not make full and timely payment as provided for in this Order. In that event, the Commission shall file a Judgment against Respondent in the Clerk of Court's Office in the County of Respondent's last known residence. Upon said filing, the Clerk of Court shall enter this Order in the amount of \$750.00 (less any money paid to the Commission) in its Judgment Rolls, without cost to the Commission.

AND IT IS SO ORDERED THIS 12TH DAY OF OCTOBER 2025.

STATE ETHICS COMMISSION


NEAL D. TRUSLOW, VICE-CHAIR


TILATHA J. MOORE
RESPONDENT