

STATE OF SOUTH CAROLINA STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:
CASE NUMBER
C 2024-012

COMPLAINT FORM

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

RESPONDENT: Jonathan Briggs
ADDRESS: [REDACTED]
TELEPHONE NUMBER: [REDACTED]
TITLE: Candidate – City of Florence Council
District 1

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. Section 8-13-1348 (B) allows payment of food or beverages consumed by the candidate or members of his immediate family while at, and in connection with, a political event. Meals, other than at a political event/function, are not allowable. According to the Quarter 2 2022 Campaign Disclosure, the Respondent six expenditures to restaurants totaling \$171.58 and made three expenditures to gas stations in the amount of \$225.04. The Respondent was instructed to provide a mileage log in connection with campaign travel for the gas purchases and provide more information regarding the campaign events at restaurants. If that could not be provided, the Respondent was instructed to either 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.

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 Davson 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 March, 2024

[REDACTED]
Meghan Walker Davson, 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 C2024-012))
))
State Ethics Commission) **NOTICE OF HEARING**
Complainant.))
))
Jonathan Briggs))
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, June 19, 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
ACCEPTANCE OF CASH EXCEEDING CASH CONTRIBUTION LIMIT
SECTION 8-13-1314(A)(2), S.C. CODE ANN., 1976, AS AMENDED

That Jonathan Briggs, candidate for Florence City Council, did in Richland County, accept a cash contribution over \$25.00, in violation of Section 8-13-1314(A)(2).

COUNT TWO
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTIONS
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Jonathan Briggs, candidate for Florence City Council, did in Richland County, fail to deposit a \$2,307.97 personal loan his campaign bank account that was reported on his 2022 Initial

Campaign Disclosure Report (CDR), in violation of Section 8-13-1312.

COUNT THREE
FAILURE TO PAY EXPENDITURE THROUGH CAMPAIGN ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Jonathan Briggs, candidate for Florence City Council, did in Richland County, fail to make twelve (12) expenditures through his campaign bank account, in violation of Section 8-13-1312.

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

That Jonathan Briggs, candidate for Florence City Council, did in Richland County, use \$396.62 campaign funds to for nine (9) personal purchases, in violation of Section 8-13-1348(A).

COUNT FIVE
IMPROPER DISBURSEMENT OF UNEXPENDED CAMPAIGN FUNDS
SECTION 8-13-1370, S.C. CODE ANN., 1976, AS AMENDED

That Jonathan Briggs, candidate for Florence City Council, did in Richland County, withdrawal \$2,556.03 of unexpended campaign funds to close his campaign account, in violation of Section 8-13-1370.

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 5th day,
of ~~January~~ February 2025.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the RESPONDENT Jonathan Briggs, 4401 Club Course Drive, North Charleston, SC 29420 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 3rd day of February 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
State Ethics Commission

Columbia, South Carolina

(803) 253-4192

STATE OF SOUTH CAROLINA)
 COUNTY OF RICHLAND)
)
 IN THE MATTER OF:)
)
 Complaint C2024-012)
)
 State Ethics Commission)
 Complainant.)
)
 Jonathan Briggs)
 Respondent.)
 _____)

BEFORE THE STATE ETHICS COMMISSION

**AMENDED
 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, August 21, 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
ACCEPTANCE OF CASH EXCEEDING CASH CONTRIBUTION LIMIT
SECTION 8-13-1314(A)(2), S.C. CODE ANN., 1976, AS AMENDED

That Jonathan Briggs, candidate for Florence City Council, did in Richland County, accept a cash contribution over \$25.00, in violation of Section 8-13-1314(A)(2).

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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.).

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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 20th day,
of March 2025.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **AMENDED NOTICE OF HEARING** was duly served on the **RESPONDENT** Jonathan Briggs, 4401 Club Course Drive, North Charleston, SC 29420 by depositing said **AMENDED NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 26th day of March 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
State Ethics Commission

Columbia, South Carolina

(803) 253-4192

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
COMPLAINT C2024-012)
State Ethics Commission,)
Complainant.)
Jonathan Briggs,)
Respondent.)

BEFORE THE STATE ETHICS COMMISSION

DECISION AND ORDER

Pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act of 1991 (Ethics Act), the Commission reviewed the above-captioned Complaint against Jonathan Briggs (Respondent) and probable cause was found to warrant an evidentiary hearing. Present at the hearing on August 21, 2025, were Commissioners Bryant S. Caldwell, Sara Parrish, and F. Xavier Starkes, Hearing Panel Chair.¹ Respondent was duly notified, but did not appear. The Commission was represented by Courtney M. Laster, Esq. The following charges were considered: one (1) count of violating Section 8-13-1314(A)(2) for accepting a cash contribution over \$25.00, one (1) count of violating Section 8-13-1312 for failing to make campaign expenditures through a campaign bank account, one (1) count of violating Section 8-13-1348(A) for using \$205.00² in campaign funds for personal purchases, and one (1) count of violating Section 8-13-1370 for improperly disbursing \$2,556.03 upon closure of a campaign bank account.³

¹ Commissioners Caldwell and Parrish appeared virtually.

² At the call of the case, Commission staff moved to amend Count 4 of the Notice of Hearing to reflect that Respondent used \$205.00 in campaign funds for personal use, rather than \$396.62 as stated in the Notice of Hearing. The motion was granted by the Panel.

³ At the call of the case, Commission staff moved to dismiss Count 2 of the Notice of Hearing, which alleged a violation of Section 8-13-1312 for Respondent's failure to deposit a personal loan into his campaign bank account. Given that Respondent was also charged with failing to make campaign expenditures for roughly the same amount as the personal loan, the Panel granted the motion and proceeded on the remaining counts.

JX # 1

FINDINGS OF FACT

Having carefully reviewed the evidence presented, the Panel finds as fact:

1. Respondent was an unsuccessful candidate in a June 14, 2022 primary election for Florence City Council.
2. In conjunction with his June 14, 2022 primary election, Respondent filed an Initial Campaign Disclosure Report (CDR), a Pre-Election CDR, a Quarter 2 2022 CDR, and a Quarter 3/Final CDR.
3. During a routine review of Respondent’s CDRs, Commission staff discovered the following expenditures totaling \$396.62 that appeared personal in nature:

	Date	Vendor	Amount
1	5/26/2022	Chick-Fil-A	\$11.54
2	5/26/2022	Chick-Fil-A	\$16.08
3	5/28/2022	Circle K	\$40.00
4	5/28/2022	Chick-Fil-A	\$9.36
5	5/30/2022	Shell	\$60.04
6	5/30/2022	Popeye’s Restaurant	\$13.17
7	5/31/2022	Orangeland Seafood	\$41.54
8	6/15/2022	Mayflower Seafood	\$80.00
9	6/16/2022	Lee’s Exxon	\$125.00
		Total	\$396.62

4. In a January 12, 2023 first-class letter, the Commission notified Respondent that these expenditures appeared to be personal rather than campaign related. The Commission advised Respondent that campaign funds could not be used for daily meals, nor could they be used for fuel unless the candidate maintained a mileage log. The Commission advised Respondent to provide a mileage log and/or documentation showing how the expenditures for food were campaign related. If Respondent could not do so, the Commission advised Respondent to donate the amount improperly spent to the Children’s Trust Fund (CTF) or a 501(c)3

JX #2

organization.

5. In a February 21, 2023 certified letter, the Commission re-iterated the contents of its January 12, 2023 letter. This letter was subsequently returned as unclaimed on April 21, 2023.
6. On April 21, 2023, the letter was re-mailed via first-class mail with a tracking number. The letter was subsequently delivered on April 22, 2023.
7. On November 2, 2023, a Commission staff member telephoned Respondent. Respondent advised the staff member that he had recently moved and had therefore not received the Commission's letters. The staff member thereafter emailed the letters to Respondent.
8. On November 7, 2023, a Commission staff member telephoned Respondent. Respondent requested additional time in order to get his campaign records from storage.
9. As of March 12, 2024, Respondent had not provided the Commission with any documents.
10. Following the filing of the Complaint, a Commission Investigator contacted Respondent and advised him to donate \$396.62, the total amount of the meal and fuel purchases disclosed by Respondent in his CDRs, to the CTF.
11. On June 6, 2024, Respondent made a \$400.00 donation to the CTF.
12. During the Commission investigation, Respondent's campaign bank account records were subpoenaed and reviewed, revealing the following relevant information:
 - a. Of the nine (9) expenditures for meal and fuel purchases disclosed by Respondent in his CDRs, only two (2) were actually paid from Respondent's campaign bank account – a June 15, 2022 expenditure to Mayflower Seafood for \$80.00 and a June 16, 2022 expenditure to Lee's Exxon for \$125.00
 - b. Respondent accepted a cash contribution of \$500.00 on May 27, 2022
 - c. Respondent failed to make the following campaign expenditures from his campaign

JX #3

bank account:

	Date	Expenditures	Amount
1	5/8/2022	Lowes	\$76.08
2	5/13/2022	Mei Thai Restaurant	\$169.00
3	5/15/2022	The Distinguished Chef Catering	\$589.18
4	5/16/2022	Vista Print	\$403.30
5	5/16/2022	Imprint Genie LLC	\$109.81
6	5/16/2022	Minuteman Press	\$102.00
7	5/17/2022	SC Democratic Committee	\$150.00
8	5/18/2022	ImPrint Genie LLC	\$75.00
9	5/26/2022	AT&T	\$416.59
10	5/27/2022	NGP VAN, Inc	\$50.00
11	5/30/2022	Lowes	\$40.94
12	6/1/2022	Lowes	\$32.42

- d. On March 25, 2022, Respondent attempted to close out his campaign bank account by making a cash withdrawal of \$2,556.03.

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. Respondent failed to make twelve (12) campaign expenditures totaling \$2,214.32 from a campaign bank account in violation of 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. 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...

3. Respondent’s June 15, 2022 expenditure to Mayflower Seafood and June 16, 2022 expenditure to Lee’s Exxon were impermissible uses of campaign funds pursuant to Section 8-13-1348(A),

JX #4

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 officeholder nor may these funds be converted to personal use. The prohibition of this subsection does not extend to the incidental personal use of campaign materials or equipment nor to an expenditure used to defray any ordinary expenses incurred in connection with an individual's duties as a holder of elective office.

See also SEC AO2016-004 (providing that meals may only be purchased when in conjunction with a political event and stressing that daily meals are impermissible).

4. Respondent was not permitted to accept the aforementioned cash contribution of \$500.00 on May 27, 2022 pursuant to Section 8-13-1314, which provides, in relevant part:

(A) 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;

5. Respondent was not permitted to close his campaign bank account by a cash withdrawal of \$2,556.03 pursuant to Section 8-13-1370(A), which provides, in relevant part:

Contributions received by a candidate that are in excess of expenditures during an election cycle must be used by the candidate upon final disbursement: (1) to defray ordinary and necessary expenses incurred in connection with his duties in his public office; (2) to be contributed to an organization exempt from tax under Section 501(c)(3) of the Internal Revenue Code of 1986, a political party, or a committee; (3) to be maintained in the campaign account for a subsequent race for the same elective office; (4) to further the candidacy of the individual for a different elective office. However, after December 31, 1992, the funds must be used in a campaign for a different elective office only as provided for in Section 8-13-1352; (5) to be returned pro rata to all contributors; (6) to be contributed to the state's general fund; or (7) to be distributed using a combination of these options.

6. 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.

JX #5

7. 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.

DECISION

NOW, THEREFORE, based on the foregoing Findings of Fact and Conclusions of Law, the Panel has determined, based on a preponderance of evidence, that Respondent Jonathan Briggs is in violation of one (1) count of Section 8-13-1314(A)(2) for accepting a cash contribution over \$25.00, one (1) count of Section 8-13-1312 for failing to make expenditures through a campaign bank account, one (1) count of Section 8-13-1348(A) for improperly using campaign funds in the amount of \$205.00, and one (1) count of Section 8-13-1370 for improperly disbursing \$2,556.03 of unexpended campaign funds when closing his campaign bank account.

THEREFORE, pursuant to Section 8-13-320(l)(i) of the Ethics Act, the Panel hereby issues a Public Reprimand and orders Respondent to pay the Commission a civil penalty of \$5,805.00⁴ and an administrative fee of \$1,175.00, for a total of \$6,980.00, within six (6) months of this Order. The Panel further orders Respondent to pay \$2,556.03, which is the amount Respondent improperly withdrew from his campaign bank account upon account closure, to the CTF and to provide proof of such payment to the Commission within six (6) months from receipt of this Order.

AND, pursuant to Section 8-13-320 of the Ethics Act, if the \$6,980.00 is not paid to the Commission and the \$2,556.03 is not paid to the CTF with proof of payment submitted to the Commission within six (6) months from receipt of this Order, a judgment in the amount of of

⁴ The Panel assesses the maximum civil penalty of \$2,000.00 for Counts 1, 3, and 5, but declines to assess a civil penalty with regard to Count 4 for Respondent’s use of campaign funds for personal use. In addition, the Panel hereby deducts \$195.00 from the civil penalties to compensate for Respondent’s overpayment to CTF.

JX #6

\$9,536.03 shall be entered against Respondent. In the event of a failure to pay, upon the Commission's filing of said Judgment with the Clerk of Court in the County of Respondent's last known residence, the Clerk of Court shall enter this Order in the amount of \$9,536.03, less any money paid, in its Judgment Rolls, without cost to the Commission.

FINALLY, Respondent Jonathan Briggs has ten (10) days from receipt of this Order to appeal this Decision and Order to the full Commission.

AND IT IS SO ORDERED THIS 26th DAY OF August 2025.

STATE ETHICS COMMISSION


F. XAVIER STARKES, HEARING CHAIR

Columbia, South Carolina