

STATE OF SOUTH CAROLINA STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:
CASE NUMBER
C 2024 - 013

COMPLAINT FORM

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

RESPONDENT: Stephanie Michelle Combs
ADDRESS: [REDACTED]
TELEPHONE NUMBER: [REDACTED]
TITLE: Board Member – Limestone Charter Association

Section 8-13-1120, SC Code Ann., 1976, as amended, requires certain officials to file a Statement of Economic Interests prior to assuming the duties of the office, and 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 2022 Statement of Economic Interests prior to July 2022 and the 2023 Statement of Economic Interests prior to March 30, 2023.

Respondent was reminded of the 2022 Statement of Economic Interests filing requirement by letters dated September 26, 2022 and February 22, 2023 as described in the attached. To date, a 2022 and 2023 Statement of Economic Interests have not been received. All in violation of Section 8-13-1120 and Section 8-13-1140, 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 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 27th day of March, 2024

[REDACTED]
Meghan Walker Dayson, Executive Director

[REDACTED]

Notary Public for South Carolina
My Commission expires 01/22/26

SEC-7 (Revised 3/2022)

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STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND) BEFORE THE STATE ETHICS COMMISSION
))
IN THE MATTER OF:)
COMPLAINT C2024-013)
))
State Ethics Commission,) **DECISION AND ORDER**
Complainant.)
))
Stephanie Michele Combs,)
Respondent.)
_____)

This matter came before the South Carolina Ethics Commission (Commission) by way of a Complaint filed on March 27, 2024. The Commission’s Executive Director reviewed the Complaint, determined it contained facts sufficient to warrant an investigation, and ordered an investigation. On July 18, 2024, the Commission reviewed the Complaint and investigative findings to determine whether probable cause existed to charge Stephanie Michele Combs (Respondent) with violating the South Carolina Ethics, Government Accountability, and Campaign Reform Act (Ethics Act). For the reasons stated herein, the Commission finds probable cause exists but waives further proceedings on the matter.

STATEMENT OF FACTS

1. Respondent was appointed to the Limestone Charter Association (Association) Board of Directors (Board) in 2021 and has served since entering upon her official responsibilities in July 2022.¹ The Association’s records do not show that Respondent was properly sworn into her position.
2. Respondent failed to file a 2022 Statement of Economic Interests (SEI) prior to entering upon her official responsibilities in July 2022.
3. In a September 26, 2022 certified letter addressed to Limestone College, the Commission assessed a \$100 late-filing penalty against Respondent for her failure to timely file a 2022 SEI.

¹ While the Commission’s investigation revealed Respondent acted as a Board member as early as 2021, the Association’s records stated Respondent began her duties in July 2022.

4. On September 28, 2022, the Association's Superintendent appealed the late-filing penalties on behalf of Respondent. The Commission denied the appeal due to Respondent not being in compliance.
5. On February 22, 2023, after acquiring Respondent's home address from the Association's Superintendent, the Commission directly notified Respondent of her failure to file a 2022 SEI.
6. According to the United States Postal Service, the certified letter was delivered to Respondent on February 24, 2023 at 11:45 a.m. The return receipt does not appear to contain Respondent's signature.
7. Respondent failed to file a 2023 SEI by March 30, 2023.
8. On March 27, 2024, the Commission filed the Complaint against Respondent for her failure to file 2022 and 2023 SEIs.
9. Respondent failed to file a 2024 SEI on or before March 30, 2024.
10. During the Commission's investigation, Respondent asserted to a Commission investigator that she believed she was no longer on the Board. Respondent further asserted that she had been undergoing cancer treatment from 2021 through the period of time the Commission was attempting to contact her and therefore had not received any Commission correspondence.
11. The Commission's investigation revealed that Respondent had not attended a Board meeting since 2023 but that Respondent's appointment was set to expire in July 2024.
12. On May 20, 2024, Respondent came into compliance by filing all requisite SEIs.

LAW

Pursuant to Section 8-13-320, the Commission is empowered to receive complaints and conduct investigations related to violations of the Ethics Act. Following the receipt of a Complaint and completion of a corresponding investigation, the Commission must determine whether there is probable cause to believe a violation of the Ethics Act occurred. Section 8-13-320(10)(i). If the

Commission determines probable cause exists, it may order a hearing on the merits or, if the Respondent has taken action to remedy or correct the alleged violation, it may waive further proceedings. Section 8-13-320(10)(i). The decision to waive further proceedings lies within the sound discretion of the Commission. Section 8-13-1110(A) of the Ethics Act requires public members to file a SEI prior to taking oath of office or entering upon their official duties and Section 8-13-1140 requires public members to file a SEI annually on or before March 30.

DISCUSSION AND DECISION

Based on evidence presented, the Commission hereby determines there is probable cause to believe that Respondent violated Section 8-13-1110 when she failed to file a 2022 SEI prior to entering upon her official duties and Section 8-13-1140 when she failed to file 2023 and 2024 SEIs prior to March 30 of those years. However, Respondent is now in compliance. Additionally, due to Respondent undergoing cancer treatment during the relevant time period, Respondent not receiving the Commission's correspondence, and concerns regarding whether Respondent was properly sworn into her position, the Commission hereby waives further proceedings pursuant to Section 8-13-320(10)(i) of the Ethics Act.

THEREFORE, pursuant to Section 8-13-320(10)(i), and the rules and regulations promulgated thereunder, the Commission hereby waives further proceedings.

AND IT IS SO ORDERED THIS 31st DAY OF October, 2024.

SOUTH CAROLINA ETHICS COMMISSION



SCOTT E. FRICK, CHAIR

Columbia, South Carolina