

STATE OF SOUTH CAROLINA  
STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:

CASE NUMBER

C 2024-023

COMPLAINT FORM

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

RESPONDENT: Norman A. Jackson  
ADDRESS: [REDACTED]  
TELEPHONE NUMBER: [REDACTED]  
TITLE: Former Richland County Councilman

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 failed to provide his occupation as a contributor.

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. Respondent failed to disclose the complete address of one contributor and four expenditures.

Section 8-13-1312, S.C. Code Ann., 1976, as amended, outlines the procedures for establishing a campaign bank account and depositing campaign contributions. 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. A contribution must not be deposited until the candidate receives information regarding the name and address of the contributor. If the name and address cannot be determined within seven days after receipt, the contribution must be remitted to the Children's Trust Fund. Respondent used an American Express credit card to pay for campaign expenses.

Respondent was reminded of the incomplete contributions and expenditures by letters dated February 9, 2023 and May 4, 2023 as described in the attached. All in violation of Section 8-13-1302, Section 8-13-1308(F), and Section 8-13-12 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 10th day of April, 2024

[REDACTED]

[REDACTED]  
Meghan Walker Dayson/Executive Director

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 C2024-023	)	
	)	
State Ethics Commission	)	<b>NOTICE OF HEARING</b>
Complainant.	)	
	)	
Norman A. Jackson	)	
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 OPERATE THROUGH CAMPAIGN BANK ACCOUNT**  
**SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED**

That Norman A. Jackson, former Richland County Councilmember, did in Richland County, make nine (9) campaign expenditures totaling \$6,109.72 with an American Express card not related to Respondent’s campaign account, in violation of Section 8-13-1312.

**COUNT TWO**  
**USE OF CASH FOR CAMPAIGN EXPENDITURE EXCEEDING TWENTY-FIVE**  
**DOLLARS**  
**SECTION 8-13-1348(C), S.C. CODE ANN., 1976, AS AMENDED**

That Norman A. Jackson, former Richland County Councilmember, did in Richland

County, use cash to make sixteen (16) campaign expenditures, exceeding \$25.00, on June 14, 2022, totaling \$2,149.43, in violation of Section 8-13-1348(C).

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 7<sup>th</sup> day,  
of July 2025.

*Certificate of Service by Certified Mail*

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the RESPONDENT Norman A. Jackson, 265 King Charles Road, Columbia, SC 29209 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 9<sup>th</sup> day of July 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

(803) 253-4192

Columbia, South Carolina

STATE ETHICS COMMISSION  
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STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )  
  
IN THE MATTER OF: )  
Complaint C2024-023 )  
  
State Ethics Commission )  
Complainant. )  
  
Norman A. Jackson )  
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 Norman A. Jackson (Respondent) and probable cause was found to warrant an evidentiary hearing. Present at the hearing on October 16, 2025, were Commissioners Bryant S. Caldwell, Helen Munnerlyn, and F. Xavier Starkes, Hearing Panel Chair<sup>1</sup>. Respondent was represented by Nathaniel Roberson and the Commission was represented by Courtney M. Laster. The following charges were considered: one (1) count of Section 8-13-1312 for making nine (9) campaign expenditures totaling \$6,109.72 with his personal American Express credit card and one (1) count of Section 8-13-1348(C)(1) for withdrawing approximately \$2,150.00 in cash from his campaign bank account to pay, and purchase lunch for, sixteen (16) campaign workers.

**FINDINGS OF FACT**

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

1. Respondent was an unsuccessful candidate for Richland County Council in a June 14, 2022 primary election.
2. In a February 9, 2023 first class letter, the Commission notified Respondent that his Quarter 2

<sup>1</sup> Commissioner Caldwell appeared virtually.

2022 Campaign Disclosure Report (CDR), 2022 Pre-Election CDR, and Quarter 1 2023 CDR contained incomplete information with regard to contributions and expenditures. More specifically, the Commission notified Respondent that he had failed to disclose the occupations and addresses of several contributors and vendors. The Commission further notified Respondent that, as disclosed by Respondent in his CDRs, he had improperly paid for campaign expenses with his personal American Express credit card.<sup>2</sup>

3. On February 21, 2023, following his receipt of the Commission's letter, Respondent contacted the Commission.
4. On February 21, 2023 and then again on June 6, 2023 and July 6, 2023, Respondent corrected some, but not all, of the incomplete entries within his CDRs.
5. On November 1, 2023, Commission staff spoke with Respondent. Respondent indicated he would obtain his bank and credit card statements, then scheduled an appointment with Commission staff for November 7, 2023.
6. On November 7, 2023, Respondent spoke with Commission staff, but still did not have his bank and credit card statements. Respondent indicated he would obtain the statements and contact Commission staff the following day.
7. Respondent did not contact the Commission again, nor did he correct the aforementioned CDRs.
8. Following the filing of the Complaint, Commission investigators subpoenaed Respondent's campaign bank account and personal American Express records. A comparison of these records to Respondent's CDRs revealed Respondent used his personal American Express

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<sup>2</sup> Respondent's Quarter 1 2023 CDR disclosed a \$1,500.00 expenditure to Perfect Printing with a description of the expenditure as follows: "For campaign literature and mail out cards and flyers ordered from Perfect Printing paid with American Express Card."

*JA #2*

credit card to make nine (9) campaign expenditures totaling \$6,109.72 as follows: (1) \$30.82 to GoDaddy.com on April 25, 2022; (2) \$766.80 to DMS Printing on May 19, 2022; (3) \$310.70 to Overnight Prints on May 23, 2022; (4) \$338.70 to Perfect Printing on May 25, 2022; (5) \$348.00 to Google/PoliEngine on May 26, 2022; (6) \$441.35 to Good Guy Signs on May 29, 2022; (7) \$441.35 to Good Guy Signs on May 30, 2022; (8) \$1,932.00 to Nikolaus Outen (Radio Management) on June 24, 2022; (9) \$1,500.00 to Perfect Printing on March 17, 2023.

9. Respondent's campaign bank account records also revealed Respondent withdrew approximately \$2,150.00 in cash to pay, and purchase lunch for, sixteen (16) campaign workers. Respondent acknowledged using cash to make these expenditures and provided a list of the sixteen (16) campaign workers to the Commission.
10. On January 23, 2025, Respondent came into compliance by disclosing the required information related to contributions and expenditures within the aforementioned CDRs.

### CONCLUSIONS OF LAW

Based upon the Findings of Fact, the Panel 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 was prohibited from using his personal American Express credit card to make campaign expenditures according 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...
3. Respondent was prohibited by Section 8-13-1348(C)(1) from withdrawing cash in excess of

JA #3

\$25.00 to make campaign expenditures:

An expenditure of more than twenty-five dollars drawn upon a campaign account must be made by: (a) a written instrument; (b) debit card; or (c) online transfers.

4. Section 8-13-320 allows the Commission to assess a civil penalty 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.

**DECISION**

NOW, THEREFORE, based on the foregoing Findings of Fact and Conclusions of Law, the Panel has determined, based on a preponderance of the evidence, that Respondent Norman A. Jackson is in violation of one (1) count of Section 8-13-1312 for making nine (9) campaign expenditures totaling \$6,109.72 with his personal American Express credit card and one (1) count of Section 8-13-1348(C)(1) for withdrawing approximately \$2,150.00 in cash from his campaign bank account to pay, and purchase lunch for, sixteen (16) campaign workers.

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 a reduced civil penalty of \$1,500.00 (\$750.00 for each count);

AND, pursuant to Section 8-13-130 of the Ethics Act, and in addition to the reduced civil penalty, the Panel hereby orders Respondent to pay an administrative fee of \$1,175.00, making Respondent’s total amount owed to the Commission \$2,675.00.

AND, pursuant to Section 8-13-320 of the Ethics Act, if the \$2,675.00 is not paid within six (6) months from Respondent’s receipt of this Order, the civil penalty shall revert to the statutory maximum of \$5,175.00 (\$2,000.00 for each count) and a judgment in the amount of

JA #4

\$5,175.00 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 \$5,175.00 in its Judgment Rolls, without cost to the Commission.

FINALLY, Respondent Norman A. Jackson has ten (10) days from receipt of this Order to appeal to the full Commission.

AND IT IS SO ORDERED THIS 11<sup>th</sup> DAY OF November 2025.

STATE ETHICS COMMISSION



F. XAVIER STARKES, HEARING  
CHAIR

Columbia, South Carolina




STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )  
IN THE MATTER OF: )  
Complaint C2024-023 )  
State Ethics Commission )  
Norman A. Jackson )  
Appellant. )  
\_\_\_\_\_ )

BEFORE THE STATE ETHICS COMMISSION

**NOTICE OF APPELLATE HEARING**

Nathaniel Roberson, Attorney for Appellant Norman A. Jackson, served an Appeal from the State Ethics Commission Hearing in Complaint C2024-023 on December 3, 2025. The State Ethics Commission will, therefore, convene a formal appellate hearing into the matter, in accordance with State Ethics Commission Regulations, 52 S.C. Code Ann. Regs. 802 (2013 Cum. Supp.) on March 19, 2026 at 9:30 a.m. at the State Ethics Commission Hearing Room located at: 201 Executive Center Drive Suite 150, Columbia, South Carolina 29210.

Pursuant to 52 S.C. Code Ann. Regs. 803, the Appellant shall file any additional briefs within ten (10) days of the date of service of this notice. In the event the Appellant fails to appear, he will have waived his hearing and judgment will stand.

  
Meghan Walker Dayson  
Executive Director

Dated this 5<sup>th</sup> day,  
of December 2025.

*Certificate of Service by Certified Mail*

I hereby certify that a copy of this **NOTICE OF APPELLATE HEARING** was duly served on Respondent's Attorney Nathaniel Roberson, 1708 Richland Street, Columbia, SC 29201 by depositing said **NOTICE OF APPELLATE HEARING** in the United States mail, Columbia, South Carolina on this 11<sup>th</sup> day of December 2025, by CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED, appropriate postage affixed, and a return address clearly indicated on said envelope.



Columbia, South Carolina

**Rachael O'Bryan, Administrative Assistant**  
State Ethics Commission

(803) 253-4192

STATE OF SOUTH CAROLINA )	
COUNTY OF RICHLAND )	BEFORE THE STATE ETHICS COMMISSION
)	
IN THE MATTER OF: )	
Complaint C2024-023 )	
)	
State Ethics Commission, )	<b>APPEAL ORDER</b>
Complainant. )	
)	
Norman A. Jackson, )	
Appellant. )	
)	

This matter comes before the State Ethics Commission (Commission) by way of a timely Notice of Appeal filed by Norman A. Jackson (Appellant) to appeal the Decision and Order (Decision) of the Commission Hearing Panel (Hearing Panel) issued November 11, 2025. Present at the March 19, 2026, Appeal Hearing were Commissioners Sara Parrish, Mary Hunter B. Tomlinson, Matthew Tyler, and Neal D. Truslow, Appellate Panel Chair.<sup>1</sup> The Commission was represented by Courtney M. Laster. Appellant was represented by Nathaniel Roberson.

**FACTS**

On October 16, 2025, pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act (Act), the Hearing Panel received testimony and documentary evidence that established the following:

1. Appellant was an unsuccessful candidate for Richland County Council in a June 14, 2022 primary election.
2. In a February 9, 2023 first class letter, the Commission notified Appellant that his Quarter 2 2022 Campaign Disclosure Report (CDR), 2022 Pre-Election CDR, and Quarter 1 2023 CDR contained incomplete information with regard to contributions and expenditures. More

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<sup>1</sup> Pursuant to Reg. 52-805(A), the Appellate Panel is comprised of the full Commission “excluding the original hearing Commissioners.” The Hearing Panel consisted of Commissioners Xavier Starkes, Bryant Caldwell, and Helen Munneryn.

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specifically, the Commission notified Appellant that he had failed to disclose the occupations and addresses of several contributors and vendors. The Commission further notified Appellant that, as disclosed by Appellant in his CDRs, he had improperly paid for campaign expenses with his personal American Express credit card.<sup>2</sup>

3. On February 21, 2023, following his receipt of the Commission's letter, Appellant contacted the Commission.
4. On February 21, 2023 and then again on June 6, 2023 and July 6, 2023, Appellant corrected some, but not all, of the incomplete entries within his CDRs.
5. On November 1, 2023, Commission staff spoke with Appellant. Appellant indicated he would obtain his bank and credit card statements, then scheduled an appointment with Commission staff for November 7, 2023.
6. On November 7, 2023, Appellant spoke with Commission staff, but still did not have his bank and credit card statements. Appellant indicated he would obtain the statements and contact Commission staff the following day.
7. Appellant did not contact the Commission again, nor did he correct the aforementioned CDRs.
8. Following the filing of the Complaint, Commission investigators subpoenaed Appellant's campaign bank account and personal American Express records. A comparison of these records to Appellant's CDRs revealed Appellant used his personal American Express credit card to make nine (9) campaign expenditures totaling \$6,109.72 as follows: (1) \$30.82 to GoDaddy.com on April 25, 2022; (2) \$766.80 to DMS Printing on May 19, 2022; (3) \$310.70 to Overnight Prints on May 23, 2022; (4) \$338.70 to Perfect Printing on May 25, 2022; (5)

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<sup>2</sup> Appellant's Quarter 1 2023 CDR disclosed a \$1,500.00 expenditure to Perfect Printing with a description of the expenditure as follows: "For campaign literature and mail out cards and flyers ordered from Perfect Printing paid with American Express Card."

\$348.00 to Google/PoliEngine on May 26, 2022; (6) \$441.35 to Good Guy Signs on May 29, 2022; (7) \$441.35 to Good Guy Signs on May 30, 2022; (8) \$1,932.00 to Nikolaus Outen (Radio Management) on June 24, 2022; (9) \$1,500.00 to Perfect Printing on March 17, 2023.

9. Appellant's campaign bank account records also revealed Appellant withdrew approximately \$2,150.00 in cash to pay, and purchase lunch for, sixteen (16) campaign workers. Appellant acknowledged using cash to make these expenditures and provided a list of the sixteen (16) campaign workers to the Commission.
10. On January 23, 2025, Appellant came into compliance by disclosing the required information related to contributions and expenditures within the aforementioned CDRs.

Based on these facts, the Hearing Panel found Appellant in violation of: (1) Section 8-13-1312 for failing to use a campaign bank account to make nine (9) campaign expenditures totaling \$6,109.72, and (2) Section 8-13-1348(C)(1) for withdrawing approximately \$2,150.00 in cash from his campaign bank account to pay, and purchase lunch for, sixteen (16) campaign workers. The Hearing Panel assessed a reduced civil penalty of \$1,500.00 (\$750.00 for each count) and an administrative fee of \$1,175.00, for a total of \$2,675.00, to be paid within six (6) months from Appellant's receipt of the Decision and Order. If Appellant failed to pay the \$2,675.00 within six (6) months, the Hearing Panel ordered the amount to revert to \$5,175.00, which is the maximum amount allowed by law (\$2,000.00 for each violation and an administrative fee of \$1,175.00). In the event of a reversion, the Hearing Panel ordered a judgment to be filed against Appellant in the amount of \$5,175.00. Appellant timely filed a request for an appeal.

Appellant now asks the Appellate Panel to reverse the Hearing Panel's Decision and Order, contending he believed he was following the rules when he took the aforementioned actions. Appellant further argues that imposing a monetary penalty in this matter will dissuade individuals

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who might otherwise seek public office. Appellant did not dispute the underlying facts related to his use of a personal credit card or the cash withdrawals.

### **CONCLUSIONS OF LAW**

Based upon the facts presented, the Commission concludes, as a matter of law:

1. At all times relevant, Appellant was a “candidate” pursuant to Section 8-13-1300(4).

Therefore, the Commission has personal and subject matter jurisdiction.

2. Appellant was prohibited from using his personal American Express credit card to make campaign expenditures according 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...

3. Appellant was prohibited by Section 8-13-1348(C)(1) from withdrawing cash in excess of \$25.00 to make campaign expenditures:

An expenditure of more than twenty-five dollars drawn upon a campaign account must be made by: (a) a written instrument; (b) debit card; or (c) online transfers.

4. The Hearing Panel was permitted to assess a reduced civil penalty of \$1,500.00 (\$750.00 per count) pursuant to Section 8-13-320, which allows the Commission to assess a civil penalty up to \$2,000.00 for each violation of the Ethics Act.
5. The Hearing Panel was permitted to assess an administrative fee of \$1,175.00 pursuant to Section 8-13-130, which allows the Commission to “levy an enforcement or administrative fee on a person who is in violation” of the Ethics Act.

### **DECISION**

NOW, based on the information presented by the Appellant, the Commission affirms the Hearing Panel’s Decision and Order. First, the Commission finds Appellant has failed to point to

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any finding of fact or conclusion of law believed to be in error within the Hearing Panel's Decision and Order. Moreover, the facts clearly demonstrate that Appellant violated Section 8-13-1312 and Section 8-13-1348(C)(1) when he took the actions described herein.

THEREFORE, pursuant to Section 8-13-320(10) of the Ethics Act, Appellant is ordered to pay the reduced civil penalty of \$1,500.00 and the administrative fee of \$1,175.00, for a total of \$2,675.00, within six (6) months from the date of Appellant's receipt of this Order. If the \$2,675.00 is not paid within the specified time period, the reduced civil penalties will revert to the statutory maximum of \$4,000.00 and a judgment in the amount of \$5,175.00 (\$4,000.00 for the civil penalties and \$1,175.00 for the administrative fee) shall be entered against Appellant. In the event of a failure to pay, upon the Commission's filing of said judgment with the Clerk of Court in Appellant's last known County of residence, the Clerk of Court shall enter this Order in the amount of \$5,175.00 in its Judgment Rolls, less any monies paid, without cost to the Commission.

FINALLY, in accordance with Section 8-13-320(10)(m), this review is the final disposition of this matter before the Commission.

AND IT IS SO ORDERED THIS 13<sup>TH</sup> DAY OF APRIL 2026.

STATE ETHICS COMMISSION

  
NEAL D. TRUSLOW  
APPELLATE PANEL CHAIR

Columbia, South Carolina