

STATE OF SOUTH CAROLINA
STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:

CASE NUMBER

C 2024-084

COMPLAINT FORM

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

RESPONDENT: Nicole G. Bennett
ADDRESS: [REDACTED]
TELEPHONE NUMBER: [REDACTED]
TITLE: Former Trustee – Hampton County School District 1

Section 8-13-1120, SC Code Ann., 1976, as amended, requires disclosure of the source, type, and amount of income from a governmental entity and a listing of the private source and type of any income received by the filer or a member of the filer's immediate family during the reporting period. Respondent failed to report government income from Hampton County School District 1 and the State of South Carolina and failed to accurately report private income on her 2021 Statement of Economic Interests.

Respondent was reminded of the filing requirement by a certified letter dated September 8, 2023 as described in the attached. To date, a properly amended 2021 Statement of Economic Interests has not been received. All in violation of Section 8-13-1120, 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
6th day of November, 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 C2024-084)
))
State Ethics Commission,) **DECISION AND ORDER**
Complainant.)
))
Nicole G. Bennett,)
Respondent.)
_____)

This matter came before the South Carolina Ethics Commission (Commission) by way of a Complaint filed on November 6, 2024. The Commission’s Executive Director reviewed the Complaint, determined it contained facts sufficient to warrant an investigation, and ordered an investigation. On May 15, 2025, the Commission reviewed the Complaint and investigative findings to determine whether probable cause existed to charge Nicole G. Bennett (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.

STATEMENT OF FACTS

1. Respondent was most recently elected to the Hampton County School District (District) Board of Trustees (Board) in a November 3, 2020 general election.
2. Respondent timely filed a 2021 Statement of Economic Interests (SEI), but failed to disclose government income therein.
3. Respondent served as a Board Trustee until July of 2021, when the District was consolidated with an adjacent district. From the date of her 2020 election until the District consolidation in 2021, the District did not hold Board meetings or conduct Board business.
4. Following the filing of the Complaint, a Commission investigator discovered Respondent had

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also improperly reported the source of her private income as “employer,” rather than specifying the actual name of her employer.

5. Respondent has since amended her 2021 SEI to properly identify her employers as the Hampton Regional Medical Center and Pruitt Health, and has properly disclosed her government income.

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 8-13-1120(A) of the Ethics Act requires public officials to disclose the source and amount of government income received in the prior calendar year, as well as the source(s) of private income in the prior calendar year.

DECISION

Based on evidence presented, the Commission hereby determines there is probable cause to believe that Respondent violated Section 8-13-1120(A) of the Ethics Act by failing to properly disclose government income and the source(s) of private income on her 2021 SEI. However, given that Respondent has amended her SEI to properly disclose these items, and in light of the confusion surrounding Respondent’s responsibilities during the District consolidation process, the

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Commission hereby waives further proceedings with regard to this Complaint.

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

AND IT IS SO ORDERED THIS 27th DAY OF May, 2025.

SOUTH CAROLINA ETHICS COMMISSION



F. XAVIER STARKES, CHAIR

Columbia, South Carolina