

STATE OF SOUTH CAROLINA
STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:
CASE NUMBER
C 2025 - 003

COMPLAINT FORM

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

RESPONDENT: Debbie F. Polk
ADDRESS: [REDACTED]
TELEPHONE NUMBER: [REDACTED]
TITLE: Candidate – Dorchester County School Board District 2

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 an accumulated aggregate of \$500.00 or more; 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. Pursuant to Section 8-13-1362 and Regulation 52-504 (C), the Pre-Election and quarterly report are required even when there have been no contributions or expenditures.

Records of the State Ethics Commission indicate that a Pre-Election Campaign Disclosure was due between October 19, 2022 and October 24, 2022.

Respondent was reminded of the filing requirement by a certified letter dated June 23, 2023 as described in the attached. To date, a properly completed Pre-Election Campaign Disclosure has not been received. All in violation of Section 8-13-1308(A), Section 8-13-1308(D)(1), and Section 8-13-1308 (F), 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
8th day of January, 2025

[REDACTED]
Meghan Walker Dayson, 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 C2025-003))
))
State Ethics Commission) **NOTICE OF HEARING**
Complainant.))
))
Debra Polk))
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 FILE AN INITIAL CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(A), S.C. CODE ANN., 1976, AS AMENDED

That Debra Polk, candidate for Dorchester County School Board, did in Richland County, fail to file a 2022 Initial Campaign Disclosure Report (CDR), in violation of Section 8-13-1308(A).

COUNT TWO
FAILURE TO FILE A PRE-ELECTION CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(D)(1), S.C. CODE ANN., 1976, AS AMENDED

That Debra Polk, candidate for Dorchester County School Board, did in Richland County, fail to file a 2022 Pre-Election CDR, in violation of Section 8-13-1308(D)(1).

COUNT THREE
FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED

That Debra Polk, candidate for Dorchester County School Board, did in Richland County, fail to file a 2022 Quarter 4 CDR, in violation of Section 8-13-1308(B).

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 21st day,
of May 2025.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the RESPONDENT Debbie F. Polk, P.O. Box 5925, Greenville, SC 29606 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 10th day of June 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 OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
Complaint C2025-003)
State Ethics Commission)
Complainant.)
Debra Polk)
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 February 19, 2026 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 FILE AN INITIAL CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(A), S.C. CODE ANN., 1976, AS AMENDED

That Debra Polk, candidate for Dorchester County School Board, did in Richland County, fail to file a 2022 Initial Campaign Disclosure Report (CDR), in violation of Section 8-13-1308(A).

COUNT TWO
FAILURE TO FILE A PRE-ELECTION CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(D)(1), S.C. CODE ANN., 1976, AS AMENDED

That Debra Polk, candidate for Dorchester County School Board, did in Richland County, fail to file a 2022 Pre-Election CDR, in violation of Section 8-13-1308(D)(1).

COUNT THREE
FAILURE TO FILE A CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED

That Debra Polk, candidate for Dorchester County School Board, did in Richland County, fail to file a 2022 Quarter 4 CDR, in violation of Section 8-13-1308(B).

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 1st day,
of October 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 Debbie F. Polk, 115 Circle Drive, Summerville, SC 29485 by depositing said **AMENDED NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 1st day of October 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 ETHICS COMMISSION
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STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
COMPLAINT C2025-003)
State Ethics Commission,)
Complainant,)
Debra F. Polk,)
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, 2025. Pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act (Ethics Act), the Complaint against Debra “Debbie” F. Polk (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 Dorchester County School Board in a November 8, 2022, election.
2. Respondent did not file a Pre-Election Campaign Disclosure Report (CDR) prior to the November 8, 2022, election.
3. Respondent filed a Statement of Economic Interests on March 1, 2023.¹
4. In a certified letter dated June 23, 2023, the Commission notified Respondent of her failure to file the 2022 Pre-Election CDR, which was due between October 19 and October 24, 2022.
5. According to the United States Postal Service (USPS), the certified letter was signed for by

¹ Respondent’s election was non-partisan. In accordance with Section 8-13-1356, Respondent was therefore not required to file a SEI unless she was elected.

Respondent on June 30, 2023 at 1:58 p.m.

6. On July 10, 2023, late-filing penalties began to accrue at \$10.00 per day.
7. On July 20, 2023, late-filing penalties began to accrue at \$100.00 per day.
8. Following the filing of the complaint, Respondent's campaign bank account records were subpoenaed. A review of these records revealed Respondent's campaign bank account was opened on October 3, 2022 with a \$500.00 deposit and was closed on December 14, 2022 with a \$158.62 donation to a 501(c)(3) charitable organization. The records further revealed that Respondent's campaign was entirely self-funded and that Respondent spent a total of \$1,300.00 in furtherance of her election.
9. On November 7, 2025, with Commission staff's assistance, Respondent filed an Initial CDR, a 2022 Pre-Election CDR, and a Quarter 4 2022 CDR.

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. Pursuant to Section 8-13-1308(A), Respondent was required to file, but failed to file, an Initial CDR within ten (10) days of her initial \$500.00 deposit on October 3, 2022:

Upon receipt or expenditure of campaign contributions or the making of independent expenditures totaling an accumulated aggregate of five hundred dollars or more, a candidate . . . must file an initial certified campaign report within ten days of these initial receipts or expenditures . . .

3. Pursuant to Section 8-13-1308(D)(1), Respondent was required to file, but failed to file, a 2022 Pre-Election CDR between October 19 and October 24, 2022:

At least fifteen days before an election, a certified campaign report

JH #2

must be filed showing contributions of more than one hundred dollars and expenditures to or by the candidate for the period ending twenty days before the election.

4. Because her campaign bank account closed on December 14, 2022, Respondent was required to file a Quarter 4 2022 CDR on or before January 10, 2023, pursuant to Section 8-13-1308(B), which provides, in relevant part:

Following the filing of an initial certified campaign report, additional certified campaign reports must be filed within ten days following the end of each calendar quarter in which contributions are received or expenditures are made, whether before or after an election until the campaign account undergoes final disbursement pursuant to the provisions of Section 8-13-1370.

5. In accordance with Section 8-13-1510(A), Respondent has accrued \$5,200.00 in late-filing penalties (\$5,000.00 for the Pre-Election CDR, \$100.00 for the Initial CDR, and \$100.00 for the Quarter 4 2022 CDR):

... a person required to file a report or statement under this chapter who files a late statement or report ... must be assessed a civil penalty as follows: (1) a fine of one hundred dollars if the statement or report is not filed within five days after the established deadline provided by law in this chapter; and (2) after notice has been given by certified or registered mail that a required statement or report has not been filed, a fine of ten dollars per calendar day for the first ten days after notice has been given, and one hundred dollars for each additional calendar day in which the required statement or report is not filed, not exceeding five thousand dollars.

Respondent did not accrue additional late-filing penalties with regard to the Initial CDR or the Quarter 4 2022 CDR because she did not receive certified notice of her failure to file these reports.

6. 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.

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DISCUSSION

The Commission found probable cause to charge Respondent with one (1) count of Section 8-13-1308(A) for failing to timely file an Initial CDR, one (1) count of Section 8-13-1308(D)(1) for failing to timely file a Pre-Election CDR, and one (1) count of Section 8-13-1308(B) for failing to timely file a Quarter 4 2022 CDR.

Through this Consent Order, Respondent admits she violated the Ethics Act as described herein. In mitigation, Respondent states that 2022 was her first and last time running for public office. Respondent further asserts that she believed she had fulfilled the filing requirements when she filed her SEI on March 1, 2023. Respondent was unaware of the difference between the SEI and the CDRs. Respondent states that her campaign was self-funded and that she personally contributed \$1,300.00 in furtherance of her election. Respondent states it was not her intent to conceal any activity from the Commission or the public.

DISPOSITION

1. The Commission hereby finds Respondent in violation of one (1) count of 8-13-1308(A), one (1) count of 8-13-1308(D)(1), and one (1) count of 8-13-1308(B).
2. The Commission adopts the Statements of Fact, Conclusions of Law, Discussion, and Disposition as agreed upon by the Respondent.

THEREFORE, the Commission hereby issues this Public Reprimand and orders Respondent to pay the Commission, within six (6) months from receipt of this Order, a reduced late-filing penalty of \$400.00 (\$200.00 for the Pre-Election CDR and \$100.00 each for the Initial CDR and the Quarter 4 2022 CDR) and an administrative fee of \$400.00, for a total of \$800.00. The Commission declines to assess the remaining late-filing penalties given the aforementioned mitigation.

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By executing this Consent Order, Respondent understands that she is not only admitting to a violation of the Ethics Act, but also confessing to a judgment in the amount of \$800.00 in the event of untimely payment as provided above. In that instance, the Commission shall file a Judgment against Respondent with the County Clerk of Court in Respondent's last known County of residence, who shall enter this Order in the amount of \$800.00 (less any money paid) in its Judgment Rolls, without cost to the Commission.

AND IT IS SO ORDERED THIS 11th DAY OF February 2026

STATE ETHICS COMMISSION





DEBRA F. POLK
RESPONDENT