

STATE OF SOUTH CAROLINA
STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:
CASE NUMBER
c 2025-011

COMPLAINT FORM

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

RESPONDENT: William L. Runyon, III
ADDRESS: [REDACTED]
TELEPHONE NUMBER: [REDACTED]
TITLE: Candidate - Charleston County School Board Trustee

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 Campaign Disclosure was due no later than January 10, 2023, April 10, 2023, July 10, 2023, October 10, 2023, January 10, 2024, April 10, 2024, July 10, 2024, October 10, 2024, and January 10, 2025. Respondent was sent an email reminder thirty days before and ten days before each Campaign Disclosure deadline.

Respondent was reminded of the filing requirements by letters dated June 9, 2023 and August 25, 2023 as described in the attached. To date, a properly completed Quarter 4 2022, Quarter 1 2023, Quarter 2 2023, Quarter 3 2023, Quarter 4 2023, Quarter 1 2024, Quarter 2 2024, Quarter 3 2024, and Quarter 4 2024 Campaign Disclosure have not been received. All in violation of Section 8-13-1308(B) 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 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
24th day of January, 2025

[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)
IN THE MATTER OF:)
Complaint C2025-011)
State Ethics Commission)
Complainant.)
William L. Runyon, III)
Respondent.)
_____)

BEFORE THE STATE ETHICS COMMISSION

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 CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED

That William L. Runyon, III, candidate for trustee of the Charleston County School Board, did in Richland County, fail to file a 2022 Quarter 4 Campaign Disclosure Report (CDR), in violation of Section 8-13-1308(B).

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

That William L. Runyon, III, candidate for trustee of the Charleston County School Board,

did in Richland County, fail to file a 2023 Quarter 1 CDR, in violation of Section 8-13-1308(B).

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

That William L. Runyon, III, candidate for trustee of the Charleston County School Board, did in Richland County, fail to file a 2023 Quarter 2 CDR, in violation of Section 8-13-1308(B).

COUNT FOUR
FAILURE TO MAINTAIN RECORDS
SECTION 8-13-1302, S.C. CODE ANN., 1976, AS AMENDED

That William L. Runyon, III, candidate for trustee of the Charleston County School Board, did in Richland County, fail to maintain campaign records for campaign contributions and expenditures, in violation of Section 8-13-1302.

COUNT FIVE
FAILURE TO DISCLOSE CAMPAIGN CONTRIBUTION
SECTION 8-13-1308(F), S.C. CODE ANN., 1976, AS AMENDED

That William L. Runyon, III, candidate for trustee of the Charleston County School Board, did in Richland County, fail to disclose three (3) campaign contributions: 1) a September 12, 2022 contribution of \$100.00 from Brenda M. Johnson; 2) a September 16, 2022 contribution of \$250.00 from Harry B. Limehouse, III, and 3) a September 22, 2022 contribution of \$200.00 from PHP, Inc., in violation of Section 8-13-1308(F).

COUNT SIX
ACCEPTANCE OF CAMPAIGN CONTRIBUTION EXCEEDING LIMITATION
SECTION 8-13-1314(A)(1)(c), S.C. CODE ANN., 1976, AS AMENDED

That William L. Runyon, III, candidate for trustee of the Charleston County School Board, did in Richland County, accept a campaign contribution from Mary T. Runyon for his November 8, 2022 election cycle in the amount of \$1,500.00, exceeding the contribution limit of \$1,000.00, in violation of Section 8-13-1314(A)(1)(c).

COUNT SEVEN
ACCEPTANCE OF CAMPAIGN CONTRIBUTION EXCEEDING LIMITATION
SECTION 8-13-1314(A)(1)(c), S.C. CODE ANN., 1976, AS AMENDED

That William L. Runyon, III, candidate for trustee of the Charleston County School Board, did in Richland County, accept two (2) campaign contributions from Mary T. Runyon for his March 8, 2023 election cycle totaling \$1,350.00, exceeding the contribution limit of \$1,000.00, in violation of Section 8-13-1314(A)(1)(c).

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

That William L. Runyon, III, candidate for trustee of the Charleston County School Board, did in Richland County, accept a \$200.00 cash contribution from Paul Padrone on October 14, 2022, in violation of Section 8-13-1314(A)(2).

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

That William L. Runyon, III, candidate for trustee of the Charleston County School Board, use campaign funds to pay a personal expense of \$2,000.00 to Cottageville Hunt Club on March 21, 2023, in violation of Section 8-13-1348(A).

COUNT TEN
PAYMENT OF EXPENDITURE WITH CASH EXCEEDING LIMITATION
SECTION 8-13-1348(C), S.C. CODE ANN., 1976, AS AMENDED

That William L. Runyon, III, candidate for trustee of the Charleston County School Board, did in Richland County, withdraw cash from his campaign bank account on twelve (12) separate occasions to make campaign expenditures exceeding \$25.00: 1) \$250.00 on June 21, 2022; 2) \$100.00 on July 19, 2022; 3) \$300.00 on September 23, 2022; 4) \$1,400.00 on October 3, 2022; 5) \$1,200.00 on October 13, 2022; 6) \$500.00 on October 14, 2022; 7) \$700.00 on October 18,

2022; 8) \$500.00 on January 20, 2023; 9) \$500.00 on January 25, 2023; 10) \$340.00 on January 27, 2023; 11) \$200.00 on February 3, 2023; and 12) \$150.00 on April 7, 2023 , 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 19th day,
of September 2025.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on RESPONDENT William L. Runyon, III, 2062 Syreford Court, Charleston, SC 29414 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 19th day of September 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 C2025-011)

State Ethics Commission,)
Complainant,)

William L. Runyon, III,)
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 24, 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 William L. Runyon, III (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 the Charleston County School Board in a November 8, 2022, general election and a February 7, 2023, special election.¹
2. Prior to the filing of the Complaint, Respondent’s most recently filed Campaign Disclosure Report (CDR) was a 2022 Pre-Election CDR filed on October 26, 2022, which reflected a positive balance of contributions. Respondent thereafter failed to file any additional CDRs.
3. In a June 9, 2023, certified letter mailed to Respondent’s address of record, the Commission advised Respondent of his failure to file a Quarter 4 2022 CDR and a Quarter 1 2023 CDR. The letter was returned to the Commission on July 14, 2023, as “Return to Sender – Unclaimed.”
4. On August 25, 2023, the penalty letter was remailed via first-class mail with tracking. According to the United States Postal Service, the letter was delivered to a “parcel locker” on August 28,

¹ The February 7, 2023, special election was scheduled after the winner of the November 8, 2022, general election declined to assume office.

2023, at 2:53 p.m.

5. On September 7, 2023, penalties began to accrue at \$10.00 per day, per CDR.
6. On September 17, 2023, penalties began to accrue at \$100.00 per day, per CDR.
7. Following the filing of the Complaint, Commission investigators subpoenaed Respondent's campaign bank account records, which revealed the following:
 - a. Respondent's campaign bank account was opened on June 21, 2022.
 - b. Respondent accepted a total of \$2,000.00 from Mary T. Runyon in conjunction with his November 8, 2022, election cycle: a \$500.00 contribution on June 21, 2022, and a \$1,500.00 contribution on October 17, 2022.
 - c. Respondent accepted a \$200.00 cash contribution from Paul Padrone on October 14, 2022.
 - d. Respondent made twelve (12) cash withdrawals exceeding \$25.00 from his campaign bank account to pay volunteers.
 - e. Respondent expended all his campaign funds and began using his campaign bank account as a personal bank account on approximately February 28, 2023.²
8. Respondent did not maintain records related to the aforementioned cash withdrawals or cash contribution. However, the Commission investigation independently established that these transactions occurred.
9. On January 21, 2023, Respondent filed a Quarter 4 2022 CDR and a Quarter 1 2023 CDR and is now in compliance.

² The Commission's investigation initially revealed that Respondent began using his campaign bank account as a personal bank account on April 7, 2023. Accordingly, the Commission found probable cause to believe Respondent violated the Ethics Act by: (1) failing to file a Quarter 2 2023 CDR in violation of Section 8-13-1308(B); (2) improperly using campaign funds to pay \$2,000.00 to the Cottageville Hunt Club on March 21, 2023, in violation of Section 8-13-1348; and (3) accepting an excessive contribution during his February 7, 2023, election cycle. Following the finding of probable cause and the issuance of the Notice of Hearing, Commission staff determined Respondent actually began using his campaign bank account as a personal bank account on approximately February 28, 2023. Therefore, Respondent was not required to file a Quarter 2 2023 CDR, the Cottageville Hunt Club expenditure was permissible, and no excessive contribution was received for his February 7, 2023, election cycle. Accordingly, the Commission declines to proceed as to these violations.

JA #2

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 expended all his campaign contributions on approximately February 28, 2023, and thereafter used his campaign bank account as a personal bank account. Therefore, Respondent was required to file a Quarter 4 2022 CDR by January 10, 2023, and a Quarter 1 2023 CDR by April 10, 2023, in accordance with Section 8-13-1308(B), which provides, in relevant part:

Following the filing of an initial certified campaign report, additional 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.

3. Respondent accepted a total of \$2,000.00 from Mary T. Runyon during his November 8, 2022, election cycle. These contributions exceeded the statutory contribution limit of \$1,000.00 per election cycle in violation of Section 8-13-1314(A)(1)(c), which provides, in relevant part:

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: . . . (1) a contribution which exceeds: . . . (c) one thousand dollars in the case of a candidate for any other office.

4. Respondent was prohibited from accepting cash contributions under Section 8-13-1314(A)(2), which provides, in relevant part:

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.

JA #3

5. Respondent failed to maintain records related to the aforementioned cash withdrawals and cash contribution in violation of under Section 8-13-1302, which provides, in relevant part:

(A) A candidate, committee, or ballot measure committee must maintain and preserve an account of: ... (3) the total amount of expenditures made by or on behalf of the candidate, committee, or ballot measure committee; (4) the name and address of each person to whom an expenditure is made including the date, amount, purpose, and beneficiary of the expenditure; (5) all receipted bills, canceled checks, or other proof of payment for each expenditure...

(B) The candidate, committee, or ballot measure committee must maintain and preserve all receipted bills and accounts required by this article for four years.

6. According to Section 8-13-1348(C), Respondent was prohibited from withdrawing more than \$25.00 in cash from his campaign bank account to pay his volunteers:

(1) 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 . . .

(2) Expenditures of twenty-five dollars or less that are not made by a written instrument, debit card, or online transfer containing the name of the candidate or committee and the name of the recipient must be accounted for by a written receipt or written record.

7. Section 8-13-1510(A) provides, in relevant part:

. . . 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.

8. Section 8-13-320(10)(l) allows the Commission to assess a \$2,000.00 civil penalty for violations of the Ethics Act and permits the Commission to require the forfeiture of any profits obtained in violation thereof.

JA #4

9. 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.

DISCUSSION

The Commission found probable cause to charge Respondent with two (2) counts of Section 8-13-1308(B) for failing to timely file a Quarter 4 2022 CDR and a Quarter 1 2023 CDR; one (1) count of Section 8-13-1302 for failing to maintain campaign records; one (1) count of Section 8-13-1314(A)(1)(c) for accepting an excessive contribution in conjunction with his November 8, 2022, election cycle; one (1) count of Section 8-13-1314(A)(2) for accepting a cash contribution; and one (1) count of Section 8-13-1348(C) for withdrawing more than \$25.00 from the campaign bank account to pay his volunteers.³

Through this Consent Order, Respondent admits he violated the Ethics Act as outlined herein. In mitigation, the Respondent states that he was a first-time candidate running for public office and that he was unfamiliar with the Commission’s filing system. Respondent states he attempted to log in and file a CDR once the February 7, 2023, special election was ordered, but contends he was unable to do so because the special election date had not yet been entered into the filing system. Respondent accepts responsibility for these violations.

DISPOSITION

1. The Commission hereby finds Respondent in violation of two (2) counts of Section 8-13-1308(B), one (1) count of Section 8-13-1302, one (1) count of Section 8-13-1314(A)(1)(c), one (1) count of Section 8-13-1314(A)(2), and one (1) count of Section 8-13-1348(C).
2. The Commission adopts the Statements of Fact, Conclusions of Law, Discussion, and Disposition as agreed upon by the Respondent.

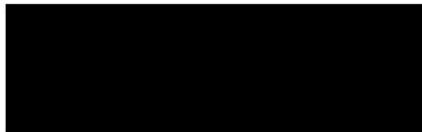
³ The Commission also found probable cause to believe Respondent failed to disclose contributions and expenditures in violation of Section 8-13-1308(F). Given that Respondent has since disclosed this activity, the Commission declines to proceed as to these violations.

JA #5

THEREFORE, the Commission hereby issues this Public Reprimand to Respondent and orders Respondent to pay the Commission, within six (6) months from receipt of this Order, a reduced late-filing penalty of \$500.00 (\$250.00 for each CDR), a reduced civil penalty of \$500.00, and an administrative fee of \$500.00, for a total of \$1,500.00. The Commission further orders Respondent to pay the excessive contribution amount of \$1,000.00 to the South Carolina Children's Trust Fund or a 501(c)(3) charitable organization and to provide proof of such payment to the Commission within six (6) months from his receipt of this Order.

By executing this Consent Order, Respondent understands that he is not only admitting to a violation of the Ethics Act, but also confessing to a judgment of \$2,500.00 in the event he does not make payment as provided for in this Order, in which case 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 \$2,500.00 (less any money paid) in its Judgment Rolls, without cost to the Commission.

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



WILLIAM L. RUNYON, III
RESPONDENT

STATE ETHICS COMMISSION

