

STATE OF SOUTH CAROLINA
STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:

CASE NUMBER

C 2025-020

COMPLAINT FORM

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

RESPONDENT: Lyman D. Dawkins, III
ADDRESS: [REDACTED]
TELEPHONE NUMBER: [REDACTED]
TITLE: Former Cherokee County Councilman and
City of Gaffney Mayor

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 income from Cherokee County on the 2021 Statement of Economic Interests.

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 and 2023 Statement of Economic Interests as a Cherokee County Councilman.

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 October 10, 2024 and January 10, 2025 in Respondent's Mayoral election cycle.

Respondent was reminded of the Statement of Economic Interests filing requirements by certified letters dated September 13, 2024 as described in the attached. In addition, an email reminder was sent thirty days prior to the Statement of Economic Interests deadlines. To date, a properly amended 2021 Statement of Economic Interests, 2022 Statement of Economic Interests, 2023 Statement of Economic Interests, Quarter 3 2024 Campaign Disclosure, or Quarter 4 2024 Campaign Disclosure have not been received. All in violation of Section 8-13-1120, Section 8-13-1140, and Section 8-13-1308(B), 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 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 26th day of February, 2025

[REDACTED]
Notary Public for South Carolina
My Commission expires 01/12/26

[REDACTED]
Meghan Walker Davson, Executive Director

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

C102form

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND) BEFORE THE STATE ETHICS COMMISSION
))
IN THE MATTER OF:))
))
Complaint C2025-020))
))
State Ethics Commission) **NOTICE OF HEARING**
Complainant.))
))
Lyman D. Dawkins, III))
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, 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 A STATEMENT OF ECONOMIC INTERESTS REPORT
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Lyman D. Dawkins, former Cherokee County Councilman, did in Richland County, fail to file 2022 Statement of Economic Interests (SEI), in violation of Section 8-13-1140.

COUNT TWO
FAILURE TO FILE A STATEMENT OF ECONOMIC INTERESTS REPORT
SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED

That Lyman D. Dawkins, former Cherokee County Councilman, did in Richland County, fail to file 2023 SEI, in violation of Section 8-13-1140.

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

That Lyman D. Dawkins, candidate for City of Gaffney Mayor, did in Richland County, fail to file a 2024 Quarter 3 Campaign Disclosure Report (CDR), in violation of Section 8-13-1308(B).

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

That Lyman D. Dawkins, candidate for City of Gaffney Mayor, did in Richland County, fail to file a 2024 Quarter 4 CDR, in violation of Section 8-13-1308(B).

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

That Lyman D. Dawkins, candidate for City of Gaffney Mayor, did in Richland County, fail to file a 2025 Quarter 2/Final CDR, in violation of Section 8-13-1308(B).

COUNT SIX
CASH WITHDRAWAL EXCEEDING PETTY CASH LIMITATION
SECTION 8-13-1348, S.C. CODE ANN., 1976, AS AMENDED

That Lyman D. Dawkins, candidate for City of Gaffney Mayor, did in Richland County, withdrawal cash from him campaign bank account exceeding the amount to replenish petty cash on July 13, 2024 by withdrawing \$300.00 and on September 4, 2024 by withdrawing \$1,000.00, in violation of Section 8-13-1348.

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

That Lyman D. Dawkins, candidate for City of Gaffney Mayor, did in Richland County,

fail to maintain records related to expenditures made to Image Plus and CP Creations and Photography, in violation of Section 8-13-1302.

COUNT EIGHT
FAILURE TO DEPOSIT CAMPAIGN CONTRIBUTION
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Lyman D. Dawkins, candidate for City of Gaffney Mayor, did in Richland County, fail to deposit a \$213.27 personal contribution into his campaign bank account, in violation of Section 8-13-1312.

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

That Lyman D. Dawkins, candidate for City of Gaffney Mayor, did in Richland County, accept cash contributions exceeding \$25.00, in violation of Section 8-13-1314(A)(2).

COUNT TEN
IMPROPER DISBURSEMENT OF UNEXPENDED CAMPAIGN FUNDS
SECTION 8-13-1370(B), S.C. CODE ANN., 1976, AS AMENDED

That Lyman D. Dawkins, candidate for City of Gaffney Mayor, did in Richland County, spend campaign funds for personal expenditures to Amazon and Audible.com totaling \$31.14, in violation of Section 8-13-1370(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 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 Lyman D. Dawkins, III, 114 Lincoln Drive, Gaffney, SC 29341 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

Columbia, South Carolina

State Ethics Commission

(803) 253-4192

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
COMPLAINT C2025-020)
State Ethics Commission,)
Complainant.)
Lyman D. Dawkins, 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 February 26, 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 Lyman D. Dawkins, 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 served on the Cherokee County Council (County Council) from 2017 through 2024.
2. As a member of County Council, Respondent did not file a Statement of Economic Interests (SEI) prior to March 30 in 2022 or 2023.
3. Respondent was a successful candidate in an August 13, 2024 election for mayor of the City of Gaffney.
4. In a September 13, 2024 certified letter, the Commission notified Respondent of his failure to file the 2022 and 2023 SEIs as a member of County Council.¹

¹ The letter also notified Respondent of his failure to timely file a 2024 SEI as a member of County Council and a 2024 Initial Campaign Disclosure Report (CDR) and a 2024 Pre-Election CDR as a candidate for mayor. These reports were filed by Respondent between September 13 and September 19, 2024, prior to

Handwritten signature and "#1"

5. According to the United States Postal Service (USPS), the certified letter was delivered to Respondent's address of record on September 23, 2024 at 4:57 p.m.
6. On October 3, 2024, late-filing penalties began to accrue at \$20.00 per day (\$10.00 per SEI).
7. On October 13, 2024, late-filing penalties began to accrue at \$200.00 per day (\$100.00 per SEI).
8. Prior to the filing of the Complaint, Respondent's most recent CDR was a 2024 Pre-Election/Quarter 2 CDR reflecting a balance of \$1,790.34 in contributions.
9. Following the filing of the Complaint, Respondent's campaign bank account records were subpoenaed and compared to Respondent's CDRs, revealing the following:
 - a. Respondent's campaign bank account was opened on June 11, 2023 and reached a zero balance on April 1, 2025
 - b. Respondent made the following cash withdrawals from his campaign bank account:
 - i. \$300.00 on July 13, 2024
 - ii. \$1,000.00 on September 4, 2024²
 - c. Respondent failed to maintain records related to a \$513.27 expenditure to Image Plus made on July 22, 2024
 - d. Respondent's CDRs reflected a July 22, 2024 personal contribution of \$213.27 that was paid directly to a vendor and was not deposited into the campaign bank account

his receipt of the Commission's certified letter. Therefore, these reports are not part of the present Complaint.

² This withdrawal corresponded to a September 4, 2024 expenditure made to CP Creations & Photography. The invoice related to this expenditure revealed Respondent paid cash.

JL #2

- e. Respondent deposited \$1,100.00 in cash into his campaign bank account on June 26, 2024, which corresponded with the following contributions disclosed in his 2024 Pre-Election CDR: \$500.00 from Mike Daniels, \$500.00 from Monier Abusaft, and \$100.00 from Respondent³
 - f. Respondent deposited \$2,000.00 in cash into his campaign bank account on June 28, 2024, which corresponded with the following contributions disclosed in his 2024 Pre-Election CDR: \$1,000.00 from Stephanie Smith and \$1,000.00 from Mike Smith⁴
10. Respondent filed a Quarter 3 2024 CDR (due on October 10, 2024) on March 5, 2025 disclosing \$38.52 in on-hand contributions.
 11. Respondent filed a Quarter 4 2024 CDR (due January 10, 2025) on March 5, 2025 disclosing \$38.52 in on-hand contributions.
 12. Respondent filed a Quarter 1 2025 CDR (due April 10, 2025) on April 2, 2025 disclosing \$38.52 in on-hand contributions.
 13. Respondent came into compliance by filing the 2022 and 2023 SEIs on March 10, 2025, and by filing the Quarter 2/Final CDR on August 26, 2025.

CONCLUSIONS OF LAW

Based upon the Statements of Fact, the Commission concludes, as a matter of law:

³ Each contributor referenced herein was interviewed by a Commission investigator and confirmed providing Respondent with a cash contribution as disclosed in Respondent's CDR.

⁴ Each contributor referenced herein was interviewed by a Commission investigator and confirmed providing Respondent with a cash contribution as disclosed in Respondent's CDR.

JL #3

1. At all times relevant, Respondent was a “public official” pursuant to Section 8-13-100(27) and a “candidate” pursuant to Section 8-13-1300(4). Therefore, the Commission has personal and subject matter jurisdiction.
2. As a member of County Council, Respondent was required to file, but failed to file, a 2022 SEI and a 2023 SEI by March 30 of each year in accordance with Section 8-13-1140, which provides, in relevant part:

A person required to file a [SEI] under this chapter annually shall file . . . an updated statement for the previous calendar year, no later than noon on March 30 . . .

3. Because his campaign bank account closed on April 1, 2025, Respondent was required to file a Quarter 3 2024 CDR by October 10, 2024, a Quarter 4 2024 CDR by January 10, 2025, and a Quarter 2/Final 2025 CDR by July 10, 2025. Respondent did not timely file these reports in accordance with 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.

4. Respondent’s July 13, 2024 cash withdrawal of \$300.00 and September 4, 2024 cash withdrawals of \$1,000.00 were impermissible pursuant to Section 8-13-1348(E), which provides:

A candidate or a duly authorized officer of a committee may not withdraw more than one hundred dollars from the campaign account to establish or replenish a petty cash fund for the candidate or committee at any time, and at no time may the fund exceed one hundred dollars . . .

5. Respondent failed to maintain records related to the aforementioned Image Plus expenditure

JL #4

pursuant to Section 8-13-1302, which provides, in relevant part:

(A) A [candidate] must maintain and preserve an account of: ... (3) the total amount of expenditures made by or on behalf of the [candidate]; (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] must maintain and preserve all receipted bills and account required by this article for four years.

6. Respondent was not permitted to make campaign expenditures from his personal bank account, but rather was required to use his campaign bank account for all campaign expenditures in accordance with Section 8-13-1312, which provides, in relevant part:

...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...

7. Respondent was prohibited from accepting the June 26, 2024 and June 28, 2024 cash contributions outlined herein pursuant to Section 8-13-1314(A), 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.

8. In accordance with Section 8-13-1510(A), Respondent has accrued \$10,300.00 in late-filing penalties (\$5,000.00 for 2022 SEI, \$5,000.00 for 2023 SEI, \$100.00 for the Quarter 3 2024 CDR, \$100.00 for the Quarter 4 2024 CDR, and \$100.00 for the Quarter 2 2025/Final CDR):

JA #5

... 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.

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.
10. Section 8-13-320(10)(1) allows the Commission to assess a \$2,000.00 civil penalty for violations of the Ethics Act and to require the forfeiture of any profits obtained in violation thereof.

DISCUSSION

The Commission found probable cause to charge Respondent with two (2) counts of Section 8-13-1140 for failing to file a 2022 SEI and a 2023 SEI; three (3) counts of Section 8-13-1308(B) for failing to timely file a Quarter 3 2024 CDR, a Quarter 4 2024 CDR, and a Quarter 2 2025 Final CDR; one (1) count of Section 8-13-1348 for withdrawing cash from his campaign bank account on July 13, 2024 and September 4, 2024; one (1) count of Section 8-13-1302 for failing to maintain campaign records related to an expenditure to Image Plus; one (1) count of Section 8-13-1312 for failing to use a campaign bank account for a personal contribution of \$213.27; and one (1) count of Section 8-13-1314(A)(2) for accepting cash contributions exceeding \$25.00.⁵

⁵ The Commission also found probable cause to believe Respondent failed to disclose one (1) contribution and one (1) expenditure, both in violation of Section 8-13-1308(F). However, given that Respondent has since disclosed this information, the Commission declines to proceed on these charges. The Commission also found probable cause to believe Respondent improperly closed his campaign bank account by making

JA #6

Through this Consent Order, Respondent acknowledges he violated the Ethics Act in each of these instances. In mitigation, Respondent states that he although he had run for public office in the past, the 2024 election cycle was his first contested election that required him to raise and spend money. As to the filings, Respondent states that he logged into the Commission's electronic filing system multiple times between September 13 and 16, 2024 and filed several reports. Respondent states that when he subsequently received the Commission's correspondence on September 23, 2024, he believed he had already fulfilled the filing requirements and was not required to take any further action. Respondent further notes that his campaign bank account maintained a balance of less than \$50.00 during the quarters in question. As to the records related to the Image Plus expenditure, Respondent states that he misplaced that invoice and has been unable to obtain it directly from the vendor. Finally, as to the cash contributions and withdrawals, Respondent states that he was unaware that cash was prohibited. Respondent acknowledges that ignorance is no excuse and asserts that he accepts full responsibility for his actions.

DISPOSITION

1. The Commission finds Respondent in violation of two (2) counts of Section 8-13-1140 for failing to timely file a 2022 SEI and a 2023 SEI; three (3) counts of Section 8-13-1308(B) for failing to file a Quarter 3 2024 CDR, a Quarter 4 2024 CDR, and a Quarter 2/Final 2025 CDR; one (1) count of Section 8-13-1348 for withdrawing \$1,300.00 in cash from his campaign bank account; one (1) count of Section 8-13-1302 for failing to maintain campaign records related to an expenditure made to Image Plus; one (1) count of Section 8-13-1312 for failing to use a campaign bank account to make a \$213.27 personal contribution; and one (1) count of Section

expenditures totaling \$31.14 to Amazon and Audible in violation of Section 8-13-1370. Respondent has since contributed this amount to an appropriate charitable organization and has provided proof of this contribution to the Commission. Accordingly, the Commission declines to proceed as to this charge.

JA #7

8-13-1314(A)(2) for accepting cash contributions exceeding \$25.00.

- 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 nine (9) months from receipt of this Order, a reduced late-filing penalty of \$700.00 (\$200.00 for each SEI and \$100.00 for each CDR) and an administrative fee of \$600.00, for a total of \$1,300.00. The Commission declines to assess a civil penalty for the remaining violations given the mitigation referenced herein.

FURTHER, the Commission orders Respondent to remit \$300.00 (the amount of cash improperly withdrawn from Respondent’s campaign bank account on July 13, 2024) to the Children’s Trust Fund and to provide proof of such payment to the Commission within nine (9) months from receipt of this Order.⁶

By executing this Consent Order, Respondent understands that he is confessing to a judgment of \$1,600.00 if 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 \$1,600.00 (less any money paid) in its Judgment Rolls, without cost to the Commission.

AND IT IS SO ORDERED THIS 11th DAY OF December 2025.

STATE ETHICS COMMISSION

[Redacted Signature]

Signed by:
Lyman D. Dawkins
811C3A6DDFE143A
LYMAN D. DAWKINS, III
RESPONDENT

⁶ The Commission declines to order reimbursement of the September 4, 2024 cash withdrawal because the Commission’s investigation determined it was used to pay a legitimate campaign expense.