

**STATE OF SOUTH CAROLINA  
STATE ETHICS COMMISSION**

**FOR COMMISSION USE ONLY:**

**CASE NUMBER**

C 2025-022

**COMPLAINT FORM**

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

**RESPONDENT:** Randall E. Curtis  
**ADDRESS:** [REDACTED]  
**TELEPHONE NUMBER:** [REDACTED]  
**TITLE:** Former Director – Abbeville County  
Registrations and Elections

Section 8-13-1110, SC Code Ann., 1976, as amended, requires certain officials to file a Statement of Economic Interests prior to assuming the duties of the office. Records in the State Ethics Commission indicate that the Respondent was required to file the 2021 Statement of Economic Interests prior to becoming the Interim Director on December 1, 2021.

Respondent was reminded of the filing requirement by a certified letter dated June 4, 2024 as described in the attached. To date, a 2021 Statement of Economic Interests has not been received. All in violation of Section 8-13-1110, 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  
26<sup>th</sup> day of February, 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**

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## Gaymon, Reginald

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**From:** Randy Curtis <rcurtis62538@gmail.com>  
**Sent:** Tuesday, April 29, 2025 4:57 PM  
**To:** Gaymon, Reginald  
**Subject:** [External] Re: State Ethics Commission and written response

Reginald Gaymond  
S.C. State Ethics Commission  
201 Executive Center Drive  
Columbia SC 29210

Subject: Explanation Regarding 2021 Ethics Filing

To Whom it May Concern:

I am writing in response to your inquiry regarding my ethics filing for the year 2021. I was appointed as the Interim Director of Elections by the Abbeville Board of Registration and Elections on November 1, 2021, with the appointment effective December 1, 2021. I was subsequently appointed Director of Abbeville County Elections on January 18, 2022.

At the time of my interim appointment, I was unaware that serving in the interim capacity required me to file a Statement of Economic (SEI) with the Ethics Commission. My oversight was not intentional but rather a misunderstanding with the guidelines set forth by the Commission.

I sincerely apologize for this oversight and any inconvenience it may have caused. The \$100.00 fine has been paid. I respectfully request that this explanation be considered in your review of this matter. Please let me know if any further action or documentation is required on my part to correct the records.

Randall Curtis  
Former Abbeville County Director of Election and Voter Registration

STATE OF SOUTH CAROLINA	)	
COUNTY OF RICHLAND	)	BEFORE THE STATE ETHICS COMMISSION
	)	
IN THE MATTER OF:	)	
COMPLAINT C2025-022	)	
	)	
State Ethics Commission,	)	<b>DECISION AND ORDER</b>
Complainant.	)	
	)	
Randall E. Curtis,	)	
Respondent.	)	
_____	)	

This matter came before the South Carolina Ethics Commission (Commission) by way of a Complaint filed on February 26, 2025. 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 Randall E. Curtis (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 served as the interim Director of the Abbeville County Registrations and Elections from December 1, 2021 until March 1, 2024.
2. Respondent failed to file a 2021 Statement of Economic Interests (SEI) prior to assuming his official duties at Director.
3. In a June 4, 2024 certified letter, the Commission unsuccessfully attempted to contact Respondent.
4. Prior to the filing of the Complaint, Commission staff contacted Respondent via telephone and explained what needed to be filed.
5. Shortly after the filing of the Complaint, Commission staff discovered that Respondent had a “Saved, Not Filed” 2021 SEI in the Commission’s electronic filing system.
6. A Commission investigator subsequently contacted Respondent and assisted Respondent with filing his 2021 SEI. Respondent informed the investigator that he was unaware he was required to file a SEI as

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interim director.

**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 on the complaint. Section 8-13-320(10)(i). The decision to waive further proceedings lies within the sound discretion of the Commission.

Section 8-13-1110 of the Ethics Act requires public employees to file a SEI prior to assuming their official duties.

**DECISION**

Based on evidence presented, the Commission hereby determines there is probable cause to believe that Respondent violated Section 8-13-1110 of the Ethics Act by failing to file a 2021 SEI. However, given that Respondent was unfamiliar with the filing requirement and because Respondent has taken action to correct the error, the 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 27<sup>th</sup> DAY OF May, 2025.

SOUTH CAROLINA ETHICS COMMISSION

  
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F. XAVIER STARKES, CHAIR

Columbia, South Carolina