

STATE OF SOUTH CAROLINA
STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:

CASE NUMBER

C 2025-028

COMPLAINT FORM

COMPLAINANT: State Ethics Commission

RESPONDENT: South Carolina Association of
Community Residential Care
Programs

ADDRESS: 201 Executive Center Drive
Suite 150
Columbia, SC 29210

ADDRESS: Troy Bell and Cathy Cassanova
P.O. Box 353
Bennettsville, SC 29512

TELEPHONE NUMBER: (803) 253-4192

TELEPHONE NUMBER: (843) 509-1341

TITLE: Lobbyist's Principal

In accordance with Section 2-17-35, South Carolina Code of Laws, 1976, as amended, each Lobbyist's Principal must file disclosure statements no later than June thirtieth and January thirty-first of each year covering lobbyist payments and expenditures attributable to lobbying during that filing period.

Records of the State Ethics Commission indicate that a Lobbyist's Principal Disclosure Statement for the reporting period of January 1, 2021 through May 31, 2021 was due no later than June 30, 2021, and a Lobbyist's Principal Disclosure Statement for the reporting period of June 1, 2021 through December 31, 2021 was due no later than January 31, 2022.

Respondent was reminded of the filing requirements by letters sent March 19, 2024, October 2, 2024, and October 23, 2024 as described in the attached. In addition, an email reminder was sent thirty days prior to the deadline. To date, a properly completed June 30, 2021 or January 31, 202 Lobbyist's Principal Disclosure Statement have not been received. All in violation of Section 2-17-35, 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

Sworn to and subscribed before me this
17th day of March 2025

[Redacted Signature]

Meghan Walker Dayson, Executive Director

[Redacted Notary Signature]

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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STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
Complaint C2025-028)
State Ethics Commission)
Complainant.)
South Carolina Association of)
Community Residential Care)
Programs)
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 allegation will be heard:

COUNT ONE
FAILURE TO FILE A LOBBYIST'S PRINCIPAL'S REPORT
SECTION 2-17-35(A), S.C. CODE ANN., 1976, AS AMENDED

That South Carolina Association of Community Residential Care Programs, a Lobbyist's Principal, did in Richland County, fail to file a June 30, 2021 Lobbyist's Principal Report, in violation of Section 2-17-35(A).

COUNT TWO
FAILURE TO FILE A LOBBYIST'S PRINCIPAL'S REPORT
SECTION 2-17-35(A), S.C. CODE ANN., 1976, AS AMENDED

That South Carolina Association of Community Residential Care Programs, a Lobbyist's Principal, did in Richland County, fail to file a January 31, 2022 Lobbyist's Principal Report, in violation of Section 2-17-35.

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.

[Redacted Signature]

Meghan Walker Dayson, Executive Director
State Ethics Commission

Dated this 28th day,
of July 2025.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the Respondent South Carolina Association of Community Residential Care, P.O. Box 353, Bennettsville, SC 29512 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 20th day of July 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 C2025-028)
State Ethics Commission,)
Complainant,)
South Carolina Association of)
Community Residential Care)
Programs,)
Respondent.)

BEFORE THE STATE ETHICS COMMISSION

CONSENT ORDER

This matter comes before the State Ethics Commission (Commission) by way of a Complaint filed on March 17, 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 South Carolina Association of Community Residential Care Programs (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. On January 28, 2021, Respondent registered as a Lobbyist's Principal (LP) for the 2021 calendar year.
2. By virtue of its registration, Respondent was required to file, but failed to file, a LP Disclosure Statement on or before June 30, 2021, for the period of January 1, 2021 through May 31, 2021.
3. Respondent was also required to file, but failed to file, a LP Disclosure Statement on or before January 31, 2022, for the period of June 1, 2021 through December 31, 2021.
4. In a March 19, 2024 first-class letter mailed to the attention of Troy Bell, the Commission notified Respondent of its failure to file June 30, 2021 and January 31, 2022 LP Disclosure Statements. The Commission did not receive a response to this letter.
5. In an October 2, 2024 certified letter mailed to the attention of Troy Bell (Bell), P.O. Box 353,

JA #1

Bennettsville, SC, the Commission ordered Respondent to cease all lobbying activity due to its failure to file the June 30, 2021 and January 31, 2022 LP Disclosure Statements.

6. On October 15, 2024, the certified letter was returned as “Return to Sender – Attempted Not Known.” A Commission staff member subsequently verified Respondent’s mailing address, but discovered Respondent had a new President – Cathy Cassanova.
7. On October 23, 2024, the certified cease and desist letter was re-mailed to Cathy Cassanova, P.O. Box 353, Bennettsville, SC.
8. According to the United State Postal Service (USPS), the October 23, 2024 letter was delivered to Respondent’s address of record on October 28, 2024 at 10:30 a.m. The certified letter appears to have been signed by Michael Cain, Respondent’s Treasurer.
9. On November 7, 2024, late-filing penalties began to accrue at \$20.00 per day (\$10.00 per LP Disclosure Statement).
10. On November 17, 2024, late-filing penalties began to accrue at \$200.00 per day (\$100.00 per LP Disclosure Statement).
11. On January 29, 2025, Commission staff sent an email to Bell regarding Respondent’s LP Disclosure Statements.
12. On January 31, 2025, Bell responded to Commission staff’s email and asked for additional time to file. In his response, Bell identified himself as “immediate past president” of Respondent. Commission staff advised Respondent had until February 17, 2025 to come into compliance.
13. Receiving no response, the Respondent’s LP account within the Commission’s electronic filing system was locked and the Complaint was filed on March 17, 2025.
14. The Commission’s investigation revealed that Respondent was chartered as a private, non-profit organization comprised of member-residential care service providers. Respondent’s stated purposes include fostering the development of high-quality community residential programs



throughout the state, encouraging alternatives to institutionalization and/or incarceration, and promoting and maintaining standards for quality within community based residential programs. In that regard, Respondent offers training workshops and seminars to its members to provide information on issues and concerns within the residential care service provider community.

15. The Commission's investigation further revealed that Respondent underwent several staffing changes throughout 2024. Most notably, Bell retired as President and was subsequently replaced by Cassanova. However, Cassanova's tenure as President lasted only three (3) or four (4) months, after which she relinquished her position due to personal reasons. At that time, Bell returned as interim-President in an attempt to re-stabilize the organization.
16. Following the filing of the Complaint, Bell received assistance from Commission staff and filed Respondent's June 30, 2021 and January 31, 2022 LP Disclosure Statements on July 24, 2025.

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 lobbyist's principal pursuant to Section 2-17-10(14). Therefore, the Commission has personal and subject matter jurisdiction.
2. Pursuant to Section 2-17-35(A), Respondent was required to file a June 30, 2021 LP Disclosure Statement and a January 31, 2022 LP Disclosure Statement:

Except as otherwise provided by Section 2-17-90(E), each lobbyist's principal, no later than June thirtieth and January thirty-first of each year, must file a report with the State Ethics Commission covering that lobbyist's principal's expenditures attributable to lobbying during that filing period. The filing periods are from January first to May thirty-first for the June thirtieth report, and are from June first to December thirty-first for the January thirty-first report . . .

3. Pursuant to Section 2-17-50(A), Respondent had accrued the maximum late-filing penalty of \$10,000.00 (\$5,000.00 for each LP Disclosure Statement) at the time it came into compliance on July 24, 2025:

JX #3

The State Ethics Commission shall: (1) require a person to submit information pursuant to the requirements of this chapter; (2) in addition to any other penalty in this chapter, require a person who files a late statement or fails to file a required statement to be assessed a civil penalty as follows: (a) a fine of one hundred dollars if not filed within ten days after the established deadline provided in this chapter; and (b) after notice has been given by certified or registered mail that a required statement 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.

4. 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 violating Section 2-17-35 for failing to file LP Disclosure Statements for June 30, 2021 and January 31, 2022. Through this Consent Order, Respondent acknowledges that it violated the Ethics Act by failing to timely file these reports. In mitigation, Respondent states that it initially believed its lobbyist was filing its LP Disclosure Statements. Respondent did not realize that this was not the case until it received the Commission’s 2024 correspondence. As to the 2024 Commission correspondence, Respondent states that it did not respond because it was undergoing changes in its administration that regretfully led to the Commission’s correspondence “falling through the cracks.” Respondent states it was not its intention to conceal anything from the public or the Commission and maintains that its failure to timely file was an administrative oversight that was corrected with the assistance of Commission staff. The Commission notes that this is Respondent’s first complaint matter.

DISPOSITION

1. The Commission hereby finds Respondent in violation of two (2) counts of 2-17-35.
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

JX # 4

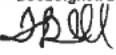
to pay the Commission, within sixty (60) days from receipt of this Order, a reduced late-filing penalty of \$1,000.00 (\$500.00 each for the June 30, 2021 and January 31, 2022 Disclosure Statements) and an administrative fee of \$900.00, for a total of \$1,900.00. The Commission declines to assess the remaining \$9,000.00 in late-filing penalties in light of the aforementioned mitigation.

By executing this Consent Order, Respondent understands that it is not only admitting to a violation of the Ethics Act, but also confessing to a judgment of \$1,900.00 in the event it 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 business or residence, who shall enter this Order in the amount of \$1,900.00 (less any money paid) in its Judgment Rolls, without cost to the Commission.

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

STATE ETHICS COMMISSION

[Redacted Signature]

DocuSigned by:

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TROY BELL
SOUTH CAROLINA ASSOCIATION
OF COMMUNITY RESIDENTIAL
CARE PROGRAMS
RESPONDENT