

Official Use Only

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C2025-109



STATE ETHICS COMMISSION
201 Executive Center Drive
Suite 150
Columbia, SC 29210
ETHICS ACT COMPLAINT FORM

Section 1. READ BEFORE COMPLETING THIS FORM:

Investigative Authority: The Ethics, Government Accountability, and Campaign Reform Act (the Act) gives the State Ethics Commission (Commission) the authority to investigate complaints against candidates, public officials, public members, public employees, at the state or local government level in South Carolina as well as lobbyists, and lobbyist's principals.

The Commission has the authority to investigate violations of Title 8, Chapter 13 of the South Carolina Code of Laws, Title 2, Chapter 17 of the South Carolina Code of Laws, Title 59, Chapter 150 of the South Carolina Code of Laws, various provisions of Title 42, Chapter 3 of the South Carolina Code of Laws, and various provisions of Title 58, Chapter 3 of the South Carolina Code of Laws

Statute of Limitations: Pursuant to Section 8-13-320(9)(d) of the Act, the Commission cannot take action on a complaint more than four years after the violation is alleged to have occurred.

Blackout Period: Pursuant to Section 8-13-320(9)(b)(1) of the Act, no complaint may be accepted against a candidate for elective office during the fifty-day period before an election in which he is a candidate.

Please note that the Commission does not have the jurisdiction to investigate alleged violations of South Carolina's Freedom of Information Act, violations of the criminal code, instances of rude or discourteous treatment, federal officials, or violations of local ordinances, policies, or procedures.

Section 2. PROCEDURES FOR SUBMITTING A COMPLAINT:

Complaints must be submitted by mailing the original of a fully completed complaint form to the Commission at 201 Executive Center Drive, Suite 150, Columbia, SC 29210. Failing to completely fill out the complaint form will result in the form being returned to you without an investigation being opened. Complaint forms must be either typed or written in clear, legible handwriting.

Both the Complainant and the Respondent have the right to be represented by legal counsel of their choosing. If either the complainant and/or the respondent chooses to be represented by legal counsel, they do so at their own expense.

Section 3. CONFIDENTIALITY:

Complaint forms become public documents if the Commission finds probable cause that a violation of law has occurred. Please note that upon receiving a properly filed complaint form, the Commission will share an unredacted copy of the complaint with the Respondent whether or not an investigation is ordered.

Section 4. COMPLAINT ACKNOWLEDGEMENT:

Please check each circle to acknowledge that you have read and understand the following:

- I understand that I may be called to testify in an administrative or criminal proceeding should probable cause be found on this matter.
- I understand that I may be subpoenaed to sit for a deposition where I will be required to answer questions under oath.
- I understand that my name, address, and phone number will be shared with the Respondent.
- I understand that my name may be made public by the Respondent or the Commission.

Section 5. CHECK THE POSITION OF THE PERSON AGAINST WHOM THIS COMPLAINT IS FILED:

- Candidate for public office
- Elected official at the state or local level
- Employee of local or state government
- Lobbyist
- Lobbyist's Principal
- Member of South Carolina Legislature
- Public member (a person appointed to a part-time board, commission, or council at the state or local level)

Section 6. COMPLAINANT AND RESPONDENT INFORMATION:

I. PERSON BRINGING THE COMPLAINT (COMPLAINANT)		
Name:	State Ethics Commission	
Address:	201 Executive Center Drive, Suite 150	
City:	Columbia	State: SC Zip Code: 29210
Telephone	(803) 253-4192	Email Address:
II. PERSON AGAINST WHOM COMPLAINT IS BROUGHT (RESPONDENT)		
Name:	Scott G. Shirley	
Address:	[REDACTED]	
City:	Tega Cay	State: SC Zip Code: 29708
Telephone	(803) 367-3069	

Section 7. THE INFORMATION CONTAINED IN THIS COMPLAINT COMES FROM:

- Personal knowledge
- Media Reports
- From a third-party
- Other
- Please specify: _____

Section 8: STATEMENT OF FACTS (Please state the actions of the Respondent upon which our ethics complaint is based):

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 2025 Statement of Economic Interests.

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 April 10, 2024, July 10, 2024, October 10, 2024, January 10, 2025, April 10, 2025, July 10, 2025, and October 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 a certified letter dated June 26, 2025 as described in the attached. To date, a properly completed 2025 Statement of Economic Interests, Quarter 1 2024, Quarter 2 2024, Quarter 3 2024, Quarter 4 2024, Quarter 1 2025, Quarter 2 2025, and Quarter 3 2025 Campaign Disclosures have not been received. All in violation of Section 8-13-1140, Section 8-13-1308(B), and Section 8-13-1308 (F), S.C. Code Ann., 1976, as amended.

Section 9. VERIFICATION BY OATH OR AFFIRMATION - ORIGINAL NOTARY AND SIGNATURES REQUIRED:

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

Personally appeared before me Meghan Walker Dayson who, first being duly sworn, says that he has read and knows the contents of the above complaint and that the allegations contained therein, are true and correct to the best of his own knowledge, except for those matters therein based upon information and belief, and as to those he/she believes them to be true.

Sworn to and subscribed before me this
25th day of November, 2025


Meghan Walker Dayson
Meghan Walker Dayson
Executive Director


Notary Public for South Carolina

My Commission expires 01/22/26

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
Complaint C2025-109)
State Ethics Commission)
Complainant.)
Scott G. Shirley)
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, August 20, 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 CAMPAIGN DISCLOSURE REPORT
SECTION 8-13-1308(B), S.C. CODE ANN., 1976, AS AMENDED

That Scott G. Shirley, Councilman for the City of Tega Cay, failed to file a Quarter 1 2024 Campaign Disclosure Report, in violation of Section 8-13-1308(B).

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

That Scott G. Shirley, Councilman for the City of Tega Cay, failed to file a Quarter 2 2024 Campaign Disclosure Report, in violation of Section 8-13-1308(B).

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

That Scott G. Shirley, Councilman for the City of Tega Cay, failed to file a Quarter 3 2024 Campaign Disclosure Report, 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 Scott G. Shirley, Councilman for the City of Tega Cay, failed to file a Quarter 4 2024 Campaign Disclosure Report, 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 Scott G. Shirley, Councilman for the City of Tega Cay, failed to file a Quarter 1 2025 Campaign Disclosure Report, in violation of Section 8-13-1308(B).

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

That Scott G. Shirley, Councilman for the City of Tega Cay, failed to file a Quarter 2 2025 Campaign Disclosure Report, in violation of Section 8-13-1308(B).

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

That Scott G. Shirley, Councilman for the City of Tega Cay, failed to file a Quarter 3 2025 Campaign Disclosure Report, in violation of Section 8-13-1308(B).

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

That Scott G. Shirley, Candidate for the City of Tega Cay Council, failed to report campaign contributions at or below \$100.00 on Campaign Disclosure Reports, in violation of Section 8-13-1308(F).

COUNT NINE
FAILURE TO USE CAMPAIGN BANK ACCOUNT
SECTION 8-13-1312, S.C. CODE ANN., 1976, AS AMENDED

That Scott G. Shirley, Candidate for the City of Tega Cay Council, failed to open a separate campaign bank account for campaign contributions and expenditures, in violation of Section 8-13-1312.

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

That Scott G. Shirley, Councilman for the City of Tega Cay, failed to file a Statement of Economic Interests on or before March 30, 2025, in violation of Section 8-13-1140.

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 2026

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on RESPONDENT Scott G. Shirley, 16125 Tana Tea Circle, Tega Cay, SC 29708 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 22 day of May 2026, by **CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED**, appropriate postage affixed, and a return address clearly indicated on said envelope.



Columbia, South Carolina

Maquita S. Kessler, Paralegal
State Ethics Commission

(803) 253-4192