

Official Use Only
Date Received:

Rev. 11/2025

C2026-021



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:	Perry K. Waring		
Address:	[REDACTED]		
City:	Charleston	State: SC	Zip Code: 29416
Telephone	[REDACTED]		

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 your ethics complaint is based):

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.

As a City of Charleston Councilman, records of the State Ethics Commission indicate that a Campaign Disclosure was due no later than January 10, 2025, April 10, 2025, July 10, 2025, October 10, 2025, and January 10, 2026 under the Charleston District 7 account for November 7, 2023 election. Respondent has reported 66 contributors and 31 expenditures. Respondent is also filing Campaign Disclosures under a Charleston City Council account with multiple election dates and has reported 57 contributors and 30 expenditures for the November 7, 2023 election cycle. Respondent was sent an email reminder thirty days before and ten days before each Campaign Disclosure deadline.

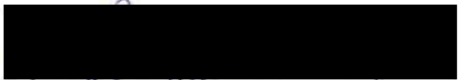
Respondent was reminded of the filing requirements by a certified letter dated July 16, 2025 as described in the attached. To date, a properly completed Quarter 4 2024, Quarter 1 2025, Quarter 2 2025, Quarter 3 2025, and Quarter 4 2025 Campaign Disclosure have not been received. All in violation of Section 8-13-1308(B) and Section 8-13-1308 (F), S.C. Code Ann., 1976, as amended.

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
25 day of March, 2026


Meghan Walker Dayson
Executive Director


Notary Public for South Carolina

My Commission expires March 14, 2033

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
Complaint C2026-021)
State Ethics Commission,)
Complainant.)
Perry K. Waring,)
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 18, 2027, 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 MAINTAIN RECORDS
SECTION 8-13-1302, S.C. CODE ANN., 1976, AS AMENDED

That Perry K. Waring, candidate for Charleston City Council, failed to maintain campaign records related to campaign contributions and expenditures, in violation of Section 8-13-1302.

COUNT TWO
FAILURE TO DISCLOSE CAMPAIGN CONTRIBUTIONS
SECTION 8-13-1308(F)(2), S.C. CODE ANN., 1976, AS AMENDED

That Perry K. Waring, candidate for Charleston City Council, failed to report a campaign contribution received on May 17, 2023 from Carol Jackson in the amount of \$100.00, in violation

of Section 8-13-1308(F)(2).

COUNT THREE
FAILURE TO DISCLOSE CAMPAIGN CONTRIBUTIONS
SECTION 8-13-1308(F)(2), S.C. CODE ANN., 1976, AS AMENDED

That Perry K. Waring, candidate for Charleston City Council, failed to report a campaign contribution deposited on September 5, 2023 from DE or GK Palassis in the amount of \$1,000.00, in violation of Section 8-13-1308(F)(2).

COUNT FOUR
FAILURE TO DISCLOSE CAMPAIGN CONTRIBUTIONS
SECTION 8-13-1308(F)(2), S.C. CODE ANN., 1976, AS AMENDED

That Perry K. Waring, candidate for Charleston City Council, failed to report a campaign contribution received on September 18, 2023 from Sunday Lempesis in the amount of \$100.00, in violation of Section 8-13-1308(F)(2).

COUNT FIVE
FAILURE TO DISCLOSE CAMPAIGN CONTRIBUTIONS
SECTION 8-13-1308(F)(2), S.C. CODE ANN., 1976, AS AMENDED

That Perry K. Waring, candidate for Charleston City Council, failed to report a campaign contribution received on May 23, 2024 from Cumulus media in the amount of \$959.00, in violation of Section 8-13-1308(F)(2).

COUNT SIX
FAILURE TO DISCLOSE CAMPAIGN EXPENDITURES
SECTION 8-13-1308(F)(4), S.C. CODE ANN., 1976, AS AMENDED

That Perry K. Waring, candidate for Charleston City Council, failed to disclose a campaign expenditure made on October 19, 2023 payable to Robert Brown in the amount of \$500.00, in violation of Section 8-13-1308(F)(4).

COUNT SEVEN
FAILURE TO DISCLOSE CAMPAIGN EXPENDITURES
SECTION 8-13-1308(F)(4), S.C. CODE ANN., 1976, AS AMENDED

That Perry K. Waring, candidate for Charleston City Council, failed to disclose a campaign expenditure made on November 15, 2023 payable to Toware Management in the amount of \$5,000.00, in violation of Section 8-13-1308(F)(4).

COUNT EIGHT
FAILURE TO DISCLOSE CAMPAIGN CONTRIBUTIONS
SECTION 8-13-1308(F)(4), S.C. CODE ANN., 1976, AS AMENDED

That Perry K. Waring, candidate for Charleston City Council, failed to disclose a campaign expenditure made on November 30, 2023 payable to Tori Haltiwanger in the amount of \$500.00, in violation of Section 8-13-1308(F)(4).

COUNT NINE
FAILURE TO DISCLOSE CAMPAIGN CONTRIBUTIONS
SECTION 8-13-1308(F)(4), S.C. CODE ANN., 1976, AS AMENDED

That Perry K. Waring, candidate for Charleston City Council, failed to disclose a campaign expenditure made on November 30, 2023 payable to Tori Haltiwanger in the amount of \$500.00, in violation of Section 8-13-1308(F)(4).

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

That Perry K. Waring, candidate for Charleston City Council, accepted a \$50.00 cash contribution, exceeding the \$25.00 cash contribution limit, in violation of Section 8-13-1314(A)(2).

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

That Perry K. Waring, candidate for Charleston City Council, accepted a \$200.00 cash

contribution, exceeding the \$25.00 cash contribution limit, in violation of Section 8-13-1314(A)(2).

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.

Dated this 17 day,
of September 2026


Meghan Walker Dayson, Executive Director
State Ethics Commission

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on RESPONDENT Perry K. Waring, PO BOX 81087 Charleston, SC 29416 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 17 day of September 2026, by CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED, appropriate postage affixed, and a return address clearly indicated on said envelope.


Maquita S. Kessler, Paralegal
State Ethics Commission

Columbia, South Carolina

(803) 253-4192