

STATE OF SOUTH CAROLINA
STATE ETHICS COMMISSION

FOR COMMISSION USE ONLY:
CASE NUMBER

c 2025-064

COMPLAINT FORM

COMPLAINANT: KEVIN COOK

RESPONDENT: WILLIAM C. MOORE

ADDRESS: [REDACTED]

ADDRESS: [REDACTED]

TELEPHONE NUMBER: [REDACTED]

TELEPHONE NUMBER: [REDACTED]

TITLE: [REDACTED]

TITLE: MAYOR

Set forth in detail specific facts upon which you based your complaint against above-named respondent (only detailed, clear factual allegations will be considered. If additional space is needed, attach supplemental sheets).

- 1) WILLIAM CRAWFORD MOORE IS THE CURRENT MAYOR OF THE TOWN OF EDISTO BEACH.
- 2) THE MAYOR OWNS 609 PORTIA STREET, COLLETON COUNTY TAX MAP 357-02-00-109.000 THROUGH KABECK, LLC
- 3) MAYOR HAS REPEATEDLY REFUSED TO RECUSE HIMSELF ON VOTES AND DISCUSSION ON A PIER PROJECT ACROSS THE STREET FROM ABOVE RENTAL PROPERTY. SUCH A PROJECT WOULD RESULT IN LIKELY FINANCIAL GAIN FOR THE MAYOR.

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 Charleston

Personally appeared before me Kevin Cook who, first being duly sworn, says that he/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 his/her 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 20 day of June 2025

[REDACTED]

[REDACTED]

Complainant Signature

Notary Public for South Carolina
My Commission expires 9/4/35

BELINDA H STEADMAN
Notary Public, State of South Carolina
My Commission Expires 9/4/2034

SEC-7 (Revised 3/2022)

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RESPONDENT: WILLIAM C. MOORE

ADDRESS: [REDACTED]

ADDRESS: [REDACTED]

TELEPHONE NUMBER: [REDACTED]

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TITLE: [REDACTED]

TITLE: MAYOR

Set forth in detail specific facts upon which you based your complaint against above-named respondent (only detailed, clear factual allegations will be considered. If additional space is needed, attach supplemental sheets).

- 1) WILLIAM CRAWFORD MOORE IS THE CURRENT MAYOR OF THE TOWN OF EDISTO BEACH.
- 2) THE MAYOR OWNS 609 PORTIA STREET, COLLETON COUNTY TAX MAP 357-02-00-109.000 THROUGH KABECK, LLC.
- 3) MAYOR HAS RENTAL INCOME FROM ABOVE PROPERTY THROUGH EDISTO REALTY.
- 4) MAYOR HAS FAILED TO REPORT THIS SOURCE OF INCOME ON HIS STATEMENTS OF ECONOMIC INTERESTS FILED WITH THE ETHICS COMMISSION.

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
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Personally appeared before me Kevin Cook who, first being duly sworn, says that he/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 his/her 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 20 day of June, 2025

[REDACTED SIGNATURE]
Complainant Signature

Notary Public for South Carolina
My Commission expires 9/4/25

BELINDA H STEADMAN
Notary Public, State of South Carolina
My Commission Expires 9/4/2034

SEC-7 (Revised 3/2022)

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND) BEFORE THE STATE ETHICS COMMISSION
))
IN THE MATTER OF:))
))
Complaint C2025-064))
))
Kevin Cook,) **NOTICE OF HEARING**
Complainant.))
))
William C. Moore,))
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, June 18, 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 DISCLOSE BUSINESS INTEREST
SECTION 8-13-1120(A), S.C. CODE ANN., 1976, AS AMENDED

That William C. Moore, Mayor for the Town of Edisto Beach, failed to disclose Kabeck, LLC as a business interest in his 2024 and 2025 Statements of Economic Interests, in violation of Section 8-13-1120(A)(5).


COUNT TWO
FAILURE TO DISCLOSE PRIVATE SOURCE OF INCOME
SECTION 8-13-1120(A), S.C. CODE ANN., 1976, AS AMENDED

That William C. Moore, Mayor for the Town of Edisto Beach, failed to disclose Kabeck,

LLC, as a private source of income in his 2022, 2023, and 2024 Statements of Economic Interests, in violation of Section 8-13-1120(A)(10).

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 March 2026.

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on RESPONDENT William C. Moore, 2 Island Cove Drive, Edisto Island, SC 29438 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 23 day of March 2026, by CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED, appropriate postage affixed, and a return address clearly indicated on said envelope.



Erin Caughman
State Ethics Commission

Columbia, South Carolina

(803) 253-4192

HARRIS & GASSER
ATTORNEYS AT LAW
1529 LAUREL STREET
COLUMBIA, SC 29201
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GREGORY P. HARRIS
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JONATHAN S. GASSER
johnny@harriggasserlaw.com

April 1, 2026

VIA EMAIL

Courtney Laster, Esquire
South Carolina State Ethics Commission
201 Executive Center Drive, Suite 150
Columbia, South Carolina 29210

**Re: William C. Moore
Complaint C2025-064**

Courtney:

This is the case we talked about earlier today. As we discussed, I have been retained to represent Mr. Moore in the above-referenced matter. Please note me as attorney of record. I look forward to working with the Ethics Commission towards an amicable resolution.

Regards,


Gregory P. Harris

GPH/awk

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)
IN THE MATTER OF:)
COMPLAINT C2025-064)
Kevin Cook,)
Complainant,)
William C. Moore,)
Respondent.)
_____)

BEFORE THE STATE ETHICS COMMISSION

CONSENT ORDER

This matter comes before the State Ethics Commission (Commission) by way of a Complaint filed on July 7, 2025.¹ Pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act (Ethics Act), the Complaint against William C. Moore (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 has served on the Town of Edisto Beach (Town) Council since 2015 and has served as Mayor since 2021. Respondent timely filed Statements of Economic Interests (SEI) from 2022-2025, but did not disclose any private sources of income therein.
2. At all times relevant, the Town has owned Burley L. Lyons Park (BLP), which consists of .18 acres of land and a 3.74-acre lake. BLP directly borders nineteen (19) parcels of land and an additional six (6) parcels of land are separated from BLP by a roadway.
3. In 2013, Respondent acquired ownership of 609 Portia Street (the Property), which is located approximately 230 feet from the entrance of BLP and is one (1) of the six (6) parcels of land separated from BLP by a roadway.
4. Since at least 2019, Respondent has utilized the Property as a short-term rental. In that regard,

¹ The Commission is bound by the four-year statute of limitations found in Section 8-13-320(9)(d) of the Ethics Act. To that end, the Commission's investigation was limited to conduct occurring on or after July 7, 2021.

JA #1

Respondent retains Edisto Sales and Rental Realty (Edisto Realty) to rent and manage the Property on his behalf. Open-source records indicate that the Property has a current fair market value of approximately \$780,000.00.

5. On June 10, 2021, Council adopted a Parks, Recreation, and Trails Master Plan (Master Plan). Among other recreational projects, the Master Plan recommended improvements to BLP.
6. On November 10, 2021, Council considered Resolution 2021-R32, which required the Town to provide partial funding for implementation of the proposed improvements. The resolution was approved unanimously with Respondent participating.
7. In May 2023, Respondent deeded ownership of the Property to Kabeck, LLC, a South Carolina limited liability company.
8. In August of 2024, the Town solicited and received bids for the design and build of a proposed boardwalk at BLP. According to the Master Plan, the proposed boardwalk was to be 190 feet long and four (4) feet wide with guardrails on both sides. The proposed boardwalk also included a 10-foot by 20-foot fixed pierhead.
9. On September 12, 2024, Council voted unanimously to approve a bid for the design and construction of the proposed boardwalk. Respondent participated in the vote.
10. On May 8, 2025, Council voted unanimously to refer the proposed BLP project to the Town Image and Design Committee (TIDE) for further community input and planning. Respondent participated in the vote.
11. On May 27, 2025, the BLP project was halted when a Town resident filed a request for a contested case hearing with the South Carolina Administrative Law Court, alleging errors in the permitting process.
12. The Commission received the instant Complaint on July 7, 2025. The Complaint alleged Respondent improperly participated in "votes and discussion on [the BLP] project across the street

JM # 2

from [the Property]” and that “such a project would result in likely financial gain” to the Respondent. The Complaint further alleged that Respondent failed to disclose rental income from the Property on his SEIs.

13. The Commission’s investigation revealed that Respondent and his spouse were the sole owners of Kabeck, LLC, which owned the Property as of May 2023. Prior to May 2023, Respondent transferred all rental proceeds from the Property into his personal bank account. After May 2023, the rental proceeds from the Property were transferred into a bank account held by Kabeck, LLC.
14. The Commission’s investigation also revealed that the proceeds generated by the Property and received by Respondent, either directly or through Kabeck, LLC, were reported by Respondent as income to the Internal Revenue Service (IRS).
15. On January 23 and January 28, 2026, Respondent amended his 2022, 2023, 2024, and 2025 SEIs to reflect the private income received from the Property and/or Kabeck, LLC, as well as his business interest in Kabeck, LLC.
16. The Commission’s investigation revealed that upon notification of the Complaint in this matter, Respondent recused himself from all further discussions or votes in regard to BLP.²

LAW

1. At all times relevant, Respondent was a “public official” pursuant to Section 8-13-100(27). Therefore, the Commission has personal and subject matter jurisdiction.
2. Section 8-13-700(B) provides, in relevant part:

No public official, public member, or public employee may make, participate in making, or in any way attempt to use his office, membership, or employment to influence a governmental decision in which he, a family member, an individual with whom he is associated,

² Since the Complaint was filed, BLP has been addressed during two (2) Council meetings. On July 10, 2025, a resident spoke about BLP during public comments. Respondent was present, but did not participate in any discussion (no votes were taken). On September 11, 2025, the TIDE Committee appeared before Council to propose the installation of osprey nesting platforms in BLP. Respondent recused himself from the vote, which passed 4-0.”

or a business with which he is associated has an economic interest. A public official, public member, or public employee who, in the discharge of his official responsibilities, is required to take an action or make a decision which affects an economic interest of himself, a family member, an individual with whom he is associated, or a business with which he is associated shall:

(1) prepare a written statement describing the matter requiring action or decisions and the nature of his potential conflict of interest with respect to the action or decision;

...

(4) if he is a public official, other than a member of the General Assembly, he shall furnish a copy of the statement to the presiding officer of the governing body of an agency, commission, board, or of a county, municipality, or a political subdivision thereof, on which he serves, who shall cause the statement to be printed in the minutes and require that the member be excused from any votes, deliberations, and other actions on the matter on which the potential conflict of interest exists and shall cause the disqualification and the reasons for it to be noted in the minutes

3. Section 8-13-100(11) defines "economic interest" as:

- (a) . . . an interest distinct from that of the general public in a purchase, sale, lease, contract, option, or other transaction or arrangement involving property or services in which a public official, public member, or public employee may gain an economic benefit of fifty dollars or more.
- (b) This definition does not prohibit a public official, public member, or public employee from participating in, voting on, or influencing or attempting to influence an official decision if the only economic interest or reasonably foreseeable benefit that may accrue to the public official, public member, or public employee is incidental to the public official's, public member's, or public employee's position or which accrues to the public official, public member, or public employee as a member of a profession, occupation, or large class to no greater extent than the economic interest or potential benefit could reasonably be foreseen to accrue to all other members of the profession, occupation, or large class.

4. Section 8-13-1120(A)(5) requires SEI filers to disclose:

the identity of every business or entity in which the filer or a member

JK #4

of the filer's immediate family held or controlled, in the aggregate, securities or interests constituting five percent or more of the total issued and outstanding securities and interests which constitute a value of one hundred thousand dollars or more

5. Section 8-13-1120(A)(10) requires SEI filers to disclose:

a listing of the private source and type of any income received in the previous year by the filer or a member of his immediate family. This item does not include income received pursuant to: (a) a court order; (b) a savings, checking, or brokerage account with a bank, savings and loan, or other licensed financial institution which offers savings, checking, or brokerage accounts in the ordinary course of its business and on terms and interest rates generally available to a member of the general public without regard to status as a public official, public member, or public employee; (c) a mutual fund or similar fund in which an investment company invests its shareholders' money in a diversified selection of securities.

6. Section 8-13-1120(C) provides:

For purposes of this section, income means anything of value received, which must be reported on a form used by the Internal Revenue Service for the reporting or disclosure of income received by an individual or business. Income does not include retirement, annuity, pension, IRA, disability, or deferred compensation payments received by the filer or filer's immediate family member.

7. Section 8-13-320(10)(1) allows the Commission to issue a civil penalty of up to \$2,000.00 for each violation of the Ethics Act.

8. 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 Complaint alleged Respondent improperly voted and/or participated in matters related to BLP, in violation of Section 8-13-700. The Commission's investigation revealed Respondent consistently voted in favor of BLP improvements and the Master Plan generally. However, the Commission did not find probable cause to believe Respondent violated Section 8-13-700 because even assuming an economic interest existed, the large class exception applies, as there are

JX #5

approximately twenty-five (25) other properties similarly impacted. See SEC AO2014-002 (permitting participation where public member was one (1) out of nineteen (19) properties impacted).

The Complaint further alleged Respondent failed to disclose rental income on his SEIs. The Commission's investigation revealed Respondent did not disclose the rental income as a private source of income either directly or through Kabeck, LLC on his 2022, 2023, or 2024 SEIs, despite reporting it as income to the IRS. Thus, the Commission found probable cause to believe Respondent violated Section 8-13-1120(A)(10). The Commission also found probable cause to believe Respondent violated Section 8-13-1120(A)(5) by failing to disclose Kabeck, LLC as a business interest on his 2024 and 2025 SEIs.³

Through this Consent Order, Respondent acknowledges he did not properly disclose Kabeck, LLC as a business interest and did not properly disclose the rental income as a private source of income. As mitigation, Respondent believed that if the rental proceeds were used solely for upkeep and maintenance on the Property, then they were not considered income for SEI disclosure purposes. The Commission acknowledges that Respondent was cooperative throughout the investigation and promptly amended his filings when advised to do so.

DISPOSITION

1. The Commission finds Respondent in violation of one (1) count of Section 8-13-1120(A)(5) and one (1) count of Section 8-13-1120(A)(10).
2. The Commission adopts the Statements of Fact, Law, Discussion, and Disposition as agreed upon by the Respondent.

³ The Commission found probable cause to support one (1) charge for each year Respondent failed to properly disclose private sources of income and his interest in Kabeck, LLC, for a total of five (5) counts. However, given that Respondent is currently in compliance, the Commission has elected to proceed on one (1) count of each violation.

THEREFORE, the Commission hereby issues this Written Warning and orders Respondent to pay the Commission, within thirty (30) days from his receipt of this Order, an administrative fee of \$600.00. The Commission declines to assess a civil penalty given the facts and mitigation referenced herein.

By executing this Consent Order, Respondent understands that he is confessing to a judgment of \$600.00 if he does not make payment as provided 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 \$600.00 (less any money paid) in its Judgment Rolls, without cost to the Commission.

AND IT IS SO ORDERED THIS 18th DAY OF June 2026.

STATE ETHICS COMMISSION



F. XAVIER STARKES



WILLIAM C. MOORE
RESPONDENT



GREGORY HARRIS
RESPONDENT'S ATTORNEY