STATE ETHICS COMMISSION
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Official Use Only
Date Received:

2026-011

Rev. 11/2025

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:

- o Candidate for public office
- o Elected official at the state or local level
- ✓ Employee of local or state government
- o Lobbyist
- o Lobbyist's Principal
- o Member of South Carolina Legislature
- o 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:	Ben Gold		
Address:	1400 Cleveland Street		
City:	Greenville	**State:** SC	**Zip Code:** 29607
Telephone	(864) 360-4991		

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

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

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

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 2022 Statement of Economic Interests prior to March 21, 2022 as the Chief Procurement Official for Greenville County Alcohol and Drug Commission.

Respondent was reminded of the filing requirement by letters dated December 20, 2024 and February 7, 2025 as described in the attached. In addition, an email reminder was sent ten days and thirty days prior to the deadline. To date, a 2022 Statement of Economic Interests has not been received. All in violation of Section 8-13-1110, SC 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
4th February day of , 2026

[redacted]

Meghan Walker Dayson
Executive Director

[redacted]

Notary Public for South Carolina

My Commission expires March 14, 2033

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	)	BEFORE THE STATE ETHICS COMMISSION
IN THE MATTER OF:	)	
Complaint C2026-011	)	
State Ethics Commission Complainant.	)	**NOTICE OF HEARING**
Ben Gold 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, October 15, 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 STATEMENT OF ECONOMIC INTERESTS
SECTION 8-13-1110, S.C. CODE ANN., 1976, AS AMENDED

That Ben Gold, Chief Procurement Officer (CPO) for Greenville County Alcohol and Drug Commission (The Phoenix Center), failed to file a 2022 Statement of Economic prior to entering upon his official responsibilities as CPO, in violation of Section 8-13-1110.

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]

Meghan Walker Dawson, Executive Director
State Ethics Commission

Dated this 16th day,
of July 2026

Certificate of Service by Certified Mail

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on RESPONDENT Ben Gold, 1400 Cleveland Street, Greenville, SC 29607 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 17 day of July 2026, by CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED, appropriate postage affixed, and a return address clearly indicated on said envelope.

[redacted]

Maquita S. Kessler, Paralegal
State Ethics Commission (803) 253-4192

Columbia, South Carolina

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STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE MATTER OF:
Complaint 2026-011

State Ethics Commission,
Complainant.

Ben Gold,
Respondent.

BEFORE THE STATE ETHICS COMMISSION

CONSENT ORDER

This matter comes before the State Ethics Commission (Commission) by way of a complaint received on February 4, 2026. Pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act (Ethics Act), the Complaint against Ben Gold (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 was employed by the Greenville County Alcohol and Drug Commission a/k/a The Phoenix Center (Center) as the Food Service Coordinator in 2018.
2. Respondent was promoted to Operations Manager in or around late March of 2022.[1] In that role, Respondent also served as the Center's Chief Procurement Officer (CPO). According to his job description, Respondent was responsible for the general procurement of supplies, as well as the implementation of procurement policies and procedures, price comparison, price negotiation, requests for production, and other procurement-related matters. Respondent held this position until February 20, 2026.

[1] The Center's records indicate Respondent began serving as the Center's Operations Manager on March 29, 2022, but Respondent believes he was not in this role until April 1, 2022. The Commission finds the distinction moot for the purposes of this Order.

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3. Respondent became aware of the annual Statement of Economic Interests (SEI) filing requirement at a later time and sought more information about filing from the Center's Finance Director. Respondent timely filed his 2023, 2024, and 2025 SEIs.
4. On December 20, 2024, Commission staff issued a penalty letter to Respondent notifying him of this failure to file. According to the United States Postal Service (USPS), the certified letter was delivered to 1400 Cleveland Street in Greenville on December 26, 2024.[2]
5. On December 11, 2025, a Commission staff member spoke with Respondent by telephone reminding him of his outstanding 2022 SEI, and sent a follow-up email to that effect. Commission staff reached out to discuss the matter with Respondent by telephone on January 13, 2026, leaving a voicemail.
6. A complaint was filed with the Commission on February 4, 2026, alleging Respondent failed to file a 2022 SEI prior to entering his official responsibilities as the Center's CPO.
7. Commission Investigator Ryanne Caldwell reviewed Respondent's filings, informed Respondent of the complaint process, and conducted interviews with Respondent and the Center's Human Resources Director Shawn Tobin.
8. During her interview, Tobin stated Respondent began serving as the Center's CPO on March 29, 2022, and that Respondent was notified by email on January 17, 2023 of his obligation to annually file an SEI. Tobin also provided a signed job description document, dated August 31, 2023, to Investigator Caldwell, which detailed several procurement-related job functions, though did not explicitly identify Respondent's role as CPO.
9. Respondent stated in his interview that he recalled speaking with Commission staff in December of 2025 about the 2022 SEI. Respondent advised he was unaware of the SEI filing

[2] 1400 Cleveland Street is the address of the Phoenix Center.

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requirement until "some point during his first year as Operations Manager." Respondent additionally stated he never received notice that he was the Center's CPO.

10. The Commission issued a Notice of Hearing to Respondent on the matter on July 23, 2026. According to USPS, Respondent signed for this Notice on July 27, 2026.

11. On August 7, 2026, Respondent submitted his 2022 SEI.

CONCLUSIONS OF LAW

Based upon the Statements of Fact, the Commission concludes, as a matter of law:

1. At all times relevant, Respondent was the Center's CPO and was required to file SEIs, pursuant to Section 8-13-1110(B), which provides, in relevant part:

> Each of the following public officials, public members, and public employees must file a statement of economic interests with the appropriate supervisory office, unless otherwise provided…(9) the chief finance official or employee and the chief purchasing official or employee of each agency, institution, or facility of state government, and of each county, municipality, or other political subdivision...

Therefore, this Commission has personal and subject matter jurisdiction.

2. Respondent failed to file an SEI prior to assuming the duties of his role as CPO, in violation of Section 8-13-1110(A), which provides, in relevant part:

> No public [] employee as designated in subsection (B) may take the oath of office or enter upon his official responsibilities unless he has filed a statement of economic interests in accordance with the provisions of this chapter with the appropriate supervisory office.

3. Section 8-13-130 allows the Commission to "levy an enforcement or administrative fee on a person who is in violation of any provision of the Ethics Act."

4. Section 8-13-320(10)(l)(i) allows the Commission to require payment of a civil penalty of up to two thousand dollars for each violation of the Ethics Act.

5. Section 8-13-1510 allows the Commission to assess late filing penalties as follows:

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> A person required to file a report or statement under this chapter who files a late statement or report or fails to file a required statement or report must be assessed a civil penalty as follows…a fine of one hundred dollars if the statement or report is not filed within five days after the established deadline provided by law in this chapter; and after notice has been given by certified or registered mail that a required statement or report has not been filed, a fine of ten dollars per calendar day for the first ten days after notice is 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.

DISCUSSION

The Commission found probable cause to charge Respondent with one count of Section 8-13-1110 for failing to file an SEI prior to assuming his duties as the Center's CPO in 2022. In mitigation, Respondent stated that he was not aware of his obligation to do so, as he was not informed that he was the agency's CPO until a later time. Additionally, Respondent consistently timely filed SEIs once he was aware of the requirement to do so, and has now filed a 2022 SEI.

DISPOSITION

1. The Commission hereby finds Respondent in violation of one count of Section 8-13-1110, as described above.
2. The Commission hereby adopts the Statements of Fact, Conclusions of Law, Discussion, and Disposition as agreed upon by the Respondent.

THEREFORE, the Commission hereby issues this written warning to Respondent for violations of the Ethics Act;

AND orders Respondent to pay to the Commission, within six (6) months of receipt of this Order, a late filing penalty of $100.00[3] and an administrative fee of $100.00, for a total of $200.00.

[3] Pursuant to Section 8-13-1510, Respondent's late-filing penalty is limited to $100.00 because there is no evidence he received certified notice of his failure to file until the receipt of the NOH on July 27, 2026. Therefore, no further penalties accrued as to the 2022 SEI.

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By executing this Consent Order, Respondent understands that he is not only admitting violations of the Act but also confessing to a judgment of $600.00 (a late-filing penalty of $100.00 and an increased administrative fee of $500.00) if he does not make payment as provided for in this Order, in which case the Commission shall file a judgment against Respondent with the Clerk of Court in Respondent's last known county of residence, who shall enter this Order in the amount of $600.00 (less any amount already paid) in its judgment rolls, without cost to the Commission.

AND IT IS ORDERED THIS 23 DAY OF OCTOBER 2026.

STATE ETHICS COMMISSION

[redacted]

NEAL D. TRUSLOW
CHAIRMAN

[redacted]

BEN GOLD,
RESPONDENT