

# Senate Ethics Committee

LUKE A. RANKIN  
CHAIRMAN

SUITE 205  
GRESSETTE OFFICE BUILDING  
TELEPHONE: (803) 212-6410  
FAX: (803) 212-6499



LEONARD P. ODOM  
RESEARCH DIRECTOR

LAURIE TRAYWICK  
ADMINISTRATIVE ASSISTANT

THE SENATE OF SOUTH CAROLINA  
P. O. BOX 142  
COLUMBIA, SOUTH CAROLINA 29202

January 23, 2014

## VIA HAND-DELIVERY

Senator Robert I. Ford  
1151 Barrett Road  
Charleston, SC 29407

**RE: Complaint of the South Carolina Senate Ethics Committee Against  
Senator Robert I. Ford**

Dear Senator Ford:

The Senate Ethics Committee (the "Committee") hereby issues this sworn Complaint against you for alleged violations of South Carolina's Ethics, Government Accountability, and Campaign Reform Act (the "Act"). After a preliminary investigation, the Committee has concluded that probable cause exists to support each of the allegations herein listed. Therefore, pursuant to Senate Rules 44 and 44.1, it is necessary to convene a formal hearing on this matter.

You have the right to be represented by independent counsel and to file a response to this Complaint with the Committee within fifteen (15) calendar days after receipt. Prior to the hearing, you also have the right to examine all evidence in the Committee's possession relating to the charges. The Committee has the right to issue subpoenas to compel the attendance and testimony of witnesses and the production of books and papers, as necessary to more fully investigate this matter.

At the hearing, you and/or your attorney have the right to call and examine witnesses, introduce exhibits, and cross-examine any opposing witnesses. The hearing must be conducted in open session. You also have the right to waive your appearance at the hearing, in which case the Committee will proceed with a disposition based on its preliminary findings and any additional evidence that it may obtain via subpoena or otherwise.

After the hearing, the Committee shall determine and issue its findings of fact. If the Committee finds, based upon competent and substantial evidence, that any of the alleged violations have occurred, it shall do the following: (1) administer a public reprimand; (2) require the payment of a civil penalty not exceeding \$2,000 for each non-technical violation; (3) require

the forfeiture of all gifts, receipts, profits, or the value thereof, obtained in violation of Chapter 13, Title 8 or Chapter 17, Title 2; (4) [inapplicable]; (5) in the case of alleged criminal violations, refer the matter to the Attorney General for investigation; or (6) require a combination of items (1) through (5), as deemed necessary and appropriate.

The Committee shall then report its findings in writing to the President Pro Tempore of the Senate. Such report must be accompanied by an order of punishment and supported and signed by a majority of the Committee's members. You would then have ten (10) days from the date of the notification of the Committee's decision to appeal any action to the full Senate. If the Committee finds that you have not violated the Act, it shall dismiss the charges.

Unless waived by you and your counsel, the Committee will notify you in writing once it has scheduled a public hearing on this matter.

### **ALLEGATIONS**

The Committee alleges, during the reporting periods covered by Campaign Disclosure Reports due July 10, 2013, through October 10, 2013, (the "Periods Involved"), the following:

1. Upon information and belief, during the Periods Involved, you converted campaign funds to personal use in violation of S.C. Code Ann. § 8-13-1348 (Supp. 2013).
2. Upon information and belief, during the Periods Involved, you misrepresented on your Campaign Disclosure Reports the amounts of various expenditures such that they were inconsistent with the actual amount of such expenditures reflected on your campaign banking statements, each of which is a separate violation of Section 8-13-1308 (Supp. 2013).

[THE REMAINDER OF THIS PAGE WAS INTENTIONALLY LEFT BLANK.]

State of South Carolina  
County of Richland

PERSONALLY APPEARED BEFORE ME, this 23<sup>rd</sup> day of January, 2014, the following Members of the Senate Ethics Committee:

Senator Luke A. Rankin, Chairman

Luke A. Rankin

Senator Hugh K. Leatherman, Sr.

~~\_\_\_\_\_~~

Senator John E. Courson

John E. Courson

Senator Robert W. Hayes, Jr.

Robert W. Hayes, Jr.

Senator J. Yancey McGill

J. Yancey McGill

Senator Harvey S. Peeler, Jr.

Harvey S. Peeler, Jr.

Senator Glenn G. Reese

Glenn G. Reese

Senator C. Bradley Hutto

C. Bradley Hutto

Senator John W. Matthews, Jr.

John W. Matthews, Jr.

Senator Darrell Jackson

Darrell Jackson

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 believes them to be true.

Leonard P. Odom

Notary Public for South Carolina

My Commission Expires: March 15, 2021