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| STATE OF SOUTH CAROLINA |) | BEFORE THE SENATE |
| COUNTY OF RICHLAND |) | Pursuant to Article XV, Section 3 |
| |) | Of the South Carolina Constitution |
| In the matter of S.534 - Concurrent Resolution |) | |
| Regarding the Removal of an Executive |) | |
| Officer |) | |
| |) | REQUESTS FOR PRODUCTION |
| CURTIS M. LOFTIS, JR., TREASURER |) | |
| OF THE STATE OF SOUTH CAROLINA |) | |
| |) | |
| _____ |) | |

TO: THE SENATE OF THE STATE OF SOUTH CAROLINA, BY AND THROUGH
SENATORS LAWRENCE K. GROOMS AND STEPHEN L. GOLDFINCH:

Curtis M. Loftis, Jr., Treasurer of the State of South Carolina, hereby serves upon you these written Requests for Production. Pursuant to Rule 34, SCRCP, A party who produces documents for inspection in response to Requests for Production shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the request. The response shall state, with respect to each item or category, that inspection and related activities will be permitted as requested, unless the request is objected to, including an objection to the requested form or forms for producing electronically stored information, in which event the reasons for objection shall be stated. If objection is made to part of an item or category, the part shall be specified. Please respond to these requests within three (3) days after service.

DEFINITIONS:

“Comptroller General’s Office” refers to Comptroller General, the Agency of the State of South Carolina, and its staff.

“Final Report” refers to the *Final Report of Findings and Recommendations on the \$1.8 Billion Discrepancy in Treasury Balances and Certain Other Matters*, dated March 25, 2025.

“Interim Report” refers to the *Interim Report of Findings and Recommendations on the \$1.8 Billion Discrepancy in Treasury Balances and Certain Other Matters*, dated April 16, 2024.

“Senate Finance Committee” shall include the Senate Finance Committee as a whole, as well as its individual members (past and present) in both their official and personal capacity, and all relevant members of Senate staff, in both their official and personal capacity.

“Subcommittee” refers to the Constitutional Budget Subcommittee of the Senate Finance Committee, and shall include the Subcommittee as a whole, as well as its individual members (past and present) in both their official and personal capacity, and all relevant members of Senate staff, in both their official and personal capacity.

“Treasurer” refers to Curtis M. Loftis, Jr., specifically and individually, and shall not be interpreted to include the action, inaction, statements, or knowledge of any other person or entity.

“Treasurer’s Office” refers to the Agency of the State of South Carolina and its staff.

REQUESTS FOR PRODUCTION:

1. All communications and materials (regardless of format or medium) created by, sent from, received or otherwise obtained by the Senate Finance Committee or Subcommittee in the conduct of their investigation of the Treasurer, regardless of whether Subcommittee relied upon such documents.
2. All notes, recordings, transcripts, and/or affidavits, created from or by witness communications created, sent from, received or otherwise obtained by the Senate Finance Committee or Subcommittee, in the conduct of their investigation, regardless of whether Subcommittee relied upon such documents.
3. Any material(s) evidencing a directive issued by President Alexander or Senate Finance Committee Chairman Peeler to Subcommittee Chairman Grooms authorizing the Subcommittee’s investigation of the Treasurer and/or the State Treasurer’s Office.

4. If you deny Request for Admission No. 1, identify and provide any and all materials supporting the basis for your denial.
5. If you deny Request for Admission No. 2, identify and provide any and all materials supporting the basis for your denial.
6. If you deny Request for Admission No. 3, identify and provide any and all materials supporting the basis for your denial.
7. If you deny Request for Admission No. 4, identify and provide any and all materials supporting the basis for your denial.
8. If you deny Request for Admission No. 5, identify and provide any and all materials supporting the basis for your denial.
9. If you deny Request for Admission No. 7, identify and provide any and all materials supporting the basis for your denial.
10. If you deny Request for Admission No. 15, identify and provide any and all materials supporting the basis for your denial.
11. If you deny Request for Admission No. 17, identify and provide any and all materials supporting the basis for your denial.
12. If you deny Request for Admission No. 18, identify and provide any and all materials supporting the basis for your denial.
13. If you deny Request for Admission No. 19, identify and provide any and all materials supporting the basis for your denial.
14. If you deny any other Request for Admission, identify and provide any and all materials supporting the basis for those denials.

15. Identify and provide any written or electronic communications referenced in Interrogatory No. 9.
16. Identify and provide any written or electronic communications referenced in Interrogatory No. 10.
17. Identify and provide any written or electronic communications referenced in Interrogatory No. 12.
18. Identify and provide any and all other materials which were cited, referenced or consulted in preparing your responses to Interrogatories and Requests for Admission.

Respectfully submitted,

s/ Deborah Barbier

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ATTORNEYS FOR CURTIS LOFTIS

April 8, 2025
Columbia, South Carolina