

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)	
)	INTERROGATORIES
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 (“Treasurer”), hereby serves upon you these written Interrogatories. Pursuant to Rule 33, SCRCP, Interrogatories shall be answered separately and fully in writing under oath, unless it is objected to, in which event the reasons for objection shall be stated in lieu of an answer. The answers are to be signed by the person making them, and the objections signed by the attorney making them. Please respond to these interrogatories 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.

INTERROGATORIES:

1. Describe with particularity the manner in which the Subcommittee was authorized to conduct an investigation of Treasurer and/or Treasurer’s Office, including but not limited to the name(s) of the person(s) or entities rendering such authority, the date such authority was given, the scope of such authority, whether the authority was oral or written, and if applicable the statute(s) or rule allowing such authority to be rendered.
2. Describe with particularity the manner in which the Senate Finance Committee, the Subcommittee, and/or other person, approved the issuance of the Interim Report, including but not limited to the date of the approval(s), whether a vote was taken, the participants of the vote and, if recorded, whether each participant’s vote was for or against.
3. Describe with particularity the manner in which the Senate Finance Committee, the Subcommittee, and/or other person, approved the issuance of the Final Report, including but not limited to the date of the approval(s), whether a vote was taken, the participants of the vote and, if recorded, whether each participant’s vote was for or against.
4. Describe with particularity the events which relate to the Treasurer’s purported “threat to release sensitive state financial information” including but not limited to the following:

- a. on or before April 2, 2024, what research and/or communications the Subcommittee conducted in making the decision to question, and in preparing to elicit testimony from Treasurer regarding his compliance with S.C. Code Ann. § 11-5-120, during the April 2, 2024 hearing of the Subcommittee;
 - b. on April 2, 2024, following the moment that the Treasurer initially made the statements in question, what specific action(s) the Subcommittee took in response to the Treasurer's purported threat, and by whom such action was taken;
 - c. on April 3, 2024, what specific action(s) the Subcommittee took in response to the Treasurer's purported threat, and by whom such action was taken;
 - d. on April 4, 2024, prior to their receipt of the letter from the Treasurer sent at 12:42 p.m., what specific action(s) the Subcommittee took in response to the Treasurer's purported threat, and by whom such action was taken;
 - e. on April 4, 2024, following the receipt of the letter from the Treasurer sent at 12:42 p.m., what specific action(s) the Subcommittee took in response to the Treasurer's purported threat, and by whom such action was taken;
 - f. the date and time that the Subcommittee received the letter from the Treasurer, sent on April 4, 2024 at 2:31 p.m., which stated that the Treasurer's office was "working toward devising a secure means of complying with these new disclosure obligations;"
5. Regarding the document which the Subcommittee Chairman identified as "Exhibit 10" and presented to the Treasurer in the April 2, 2024 hearing, and which was later identified as Exhibit 7 of the Interim Report, provide the following:
 - a. the name and title of the individual(s) who prepared said document;

- b. the name and title of the individual(s) who requested and/or approved the creation of said document, the insertion of the SCEIS header, and/or the insertion of the bottom two rows of data;
 - c. the name and title of the individual(s) who recommended that said document be presented to the Treasurer during his April 2, 2024 budget hearing for the purpose of eliciting testimony;
 - d. the Subcommittee and/or Subcommittee Chairman's justification for presenting said document to the Treasurer during his April 2, 2024 budget hearing for the purpose of eliciting testimony;
 - e. the Subcommittee's justification for including said document in its Initial Report and Final Report;
 - f. the date(s) and nature of any disciplinary action taken with regard to the individual(s) involved in the creation and/or presentation of this document.
6. Regarding the video which was presented to Clarissa Adams in the February 18, 2025, meeting of the Subcommittee which was edited to remove certain statements by Senator McElveen, provide the following:
- a. the name and title of the individual(s) who prepared and/or edited the video;
 - b. the name and title of the individual(s) who requested and/or approved such preparation and editing of the video;
 - c. the reason for editing the video to remove Senator McElveen's statements;
 - d. the Subcommittee and/or Chairman's justification for declining to inform Clarissa Adams that the video presented to her had been edited to remove those statements;

- e. the date(s) and nature of any disciplinary action taken with regard to the individual(s) involved in the creation and/or presentation of the video.
- 7. State the Subcommittee Chairman's justification for denying the Treasurer's attorney the ability to make objections and/or raise concerns about attorney-client privilege, and his insistence that the attorney be sworn in as a witness, during the February 27, 2025, meeting of the Subcommittee.
- 8. From January 1, 2023, to present, list all communications and/or materials provided to the Senate Finance Committee or Subcommittee, containing information or images which are now known to be false, inauthentic, or modified from its original form, from the following individuals and describe the specific nature of such falseness, inauthenticity, or modification:
 - a. Brian Gaines
 - b. Richard Harmon
 - c. David Starkey
 - d. Katherine Kip
- 9. From January 1, 2023, to present, list each and every discussion and communication sent to or received by the Senate Finance Committee or Subcommittee pertaining to the appointment of any individual to the position of Comptroller General upon the removal or resignation of Richard Eckstrom, including but not limited to the following:
 - a. the names of all known participants/recipients;
 - b. the date and time of the communication;
 - c. the individual being discussed for appointment as Comptroller General;
 - d. if oral, the content of the communication.

10. From January 1, 2023, to present, list each and every discussion and communication sent to or received by the Senate Finance Committee or Subcommittee pertaining to the appointment of any individual to the position of Treasurer upon the removal or resignation of Curtis M. Loftis, Jr., including but not limited to the following:
 - a. the names of all known participants/recipients;
 - b. the date and time of the communication;
 - c. the individual being discussed for appointment as Treasurer;
 - d. if oral, the content of the communication.
11. List each and every discussion and communication sent to or received by the Senate Finance Committee or Subcommittee pertaining to the matters discussed in, or drafting of the March 31, 2025, letter from Robert D. Cook, Solicitor General, to the Treasurer:
 - a. the names of all known participants/recipients;
 - b. the date and time of the communication;
 - c. if oral, the content of the communication.
12. Set forth the Subcommittee's reasoning for declining to include in its Final Report the exhibits referenced in, and issued with the "State Treasurer's Office Overview of Issues Surrounding State SCEIS Fund 30350993 and Other Allegations," including, but not limited to the following exhibits included therein:
 - a. EXHIBIT 1 evidencing the Comptroller General's Office determination and directive that SCEIS Fund 30350993 be excluded from the ACFR.
 - b. EXHIBIT 3 evidencing the Comptroller General's Office directive to the State Treasurer's Office to make the conversion entries which ultimately resulted in appropriations being improperly recorded as cash in SCEIS Fund 30350993.

- c. EXHIBIT 6 evidencing the Comptroller General's Office directive to the State Treasurer's Office to record the (then) \$1.5 billion balance of SCEIS Fund 30350993 in the "Due to Other Funds – Equity in Pooled Cash" account—a General Ledger account which the Comptroller General's Office created.
 - d. EXHIBIT 7 evidencing the Comptroller General's Office directive to the the State Treasurer's Office to record an additional \$325 million dollars in SCEIS Fund 30350993.
 - e. EXHIBITS 25 and 27 evidencing the efforts of the Treasurer's Office on April 3 and 4, 2024, to work with the Department of Administration to determine how the sensitive "SCEIS fund" information could be securely posted, if at all.
13. If you deny Request for Admission No. 20, provide a justification for the Senate presenters' immunity from liability for their false statements and publications in the removal proceedings of a Constitutional officer elected by popular vote on a statewide basis.
14. If you deny Request for Admission No. 21, provide a justification for the Senator Goldfinch's immunity from liability for liability and/or professional discipline as an attorney presenting before a tribunal.

Respectfully submitted,

s/ Deborah Barbier

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ATTORNEYS FOR CURTIS LOFTIS

April 8, 2025
Columbia, South Carolina