

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

IN THE COURT OF COMMON PLEAS

SC SAFE ELECTIONS and)
MICHAEL FUNDERBURK)

C.A. NO. 2022-CP- 4004438

Plaintiff,)
) vs.)

THE BOARDS OF ELECTIONS FOR)
AIKEN COUNTY, BEAUFORT COUNTY,))
CHARLESTON COUNTY, DORCHESTER))
COUNTY, GREENVILLE COUNTY,))
LEXINGTON COUNTY, SPARTANBURG))
COUNTY, YORK COUNTY, and THE))
SOUTH CAROLINA STATE ELECTION))
COMMISSION, HOWARD KNAPP IN))
HIS OFFICIAL CAPACITY))

AFFIDAVIT OF EXPERT

Defendant,)

_____))
TO: THE DEFENDANT ABOVE-NAMED,

I, Donnie Scoggins, make this statement after being duly sworn and attest to the following:

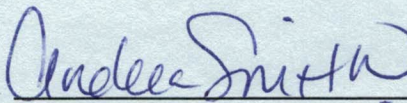
1. I am Donnie Scroggins of Trumann, Arkansas in Poinsett County.
2. My background is Data Analytics and Cybersecurity and I have attached my Curriculum vitae to this affidavit as Exhibit 1.
3. I have reviewed the pleadings in the above-referenced case, and I believe that it is not possible to identify an individual's physical voted and tabulated Paper Ballot by analyzing any of the data, reports, and lists that are produced by the Electronic Voting System; specifically, Electronic Systems and Software, Inc. (ES@S).
4. Based upon my experience and knowledge of these machines and the election industry it is my expert opinion that the South Carolina Cast Vote Records cannot contain any personal identifiable information that would except them from being subject to the South Carolina Freedom of Information laws.
5. These records have been found to be subject to FOIA laws in other states including but not limited to: Arkansas, Texas, and California
6. I have requested via the Arkansas Freedom of Information Act (FOIA) records such as: Cast Vote Records, Ballot Review Files, Early Voting Lists, Clarity Upload Files, and the "C" and "I" files from past Arkansas Elections. After receiving the above mentioned files, I then analyzed the data for data patterns, vote choice patterns, and for Voter post-election patterns.
7. I appended (added) the Ballot Review File to the Cast Vote Records file along with other items mentioned above and was not able to identify a Voted Ballot by an individual Voter by using a Cast Vote Record or any other records or data I had in my possession. I tried but was unsuccessful

to take data from the ES@S Voting System used in Arkansas and then physically locate my own voted Ballot.

 _____

Signature

SWORN TO BEFORE ME

 Notary
Public
Arkansas, Poinsett
State County

Comm. exp.

8/7/2028

ANDREA SMITH
NOTARY PUBLIC-STATE OF ARKANSAS
POINSETT COUNTY
My Commission Expires 08-07-2028
Commission # 12705076

Exhibit 1

Curriculum Vitae of Donnie L. Scroggins

Donnie L. Scroggins
113 South Magnolia DR
Trumann, AR 72472-2916
(870) 974-3438 Mobile
scroggins_donnie@yahoo.com

EDUCATION

BS	Management Information Systems (emphasis in database administration and telecommunications, Arkansas State University)
MFA	Masters, Political Science, Arkansas State University
MPA	Masters in Public Administration
10 Hours	toward a Masters in Business Administration
9 Hours	toward a Computer Science Master

EXPERIENCE

- 1983-1989 Nuclear, Biological, and Nuclear Warfare Specialist
346th Ordnance Co. USAR Reserve
- 1983-1991 Mechanical Engineering Designer
- 1985-1992 Regional Vice President, A.L. Williams Co.
- 1992 to Present Self Employed/Entrepreneur
POSID, LLC, Scroggins Automated Medical Systems, Inc., JDS
Enterprises, Consultant
- 1995-2012 Nuclear, Biological, and Nuclear Warfare Specialist
875 Engineering BN, HQ Co.
- 2004-2006 Mortgage Broker, Independent
Access First Mortgage, LLC
- 2006-2007 Computer Network Administrator (25B)
Customs Clearance Officer
Certifier of Hazardous Material Transportation
Operation Iraqi Freedom, Camp Striker, Baghdad, Iraq
- 2007 to Present Self Employed, Consultant
Software/Hardware Programming, Digital Media and E-Commerce
Development (LynnWood Solutions, LLC), Business Analysts, and
Business Development
- 2020 to Present Election Integrity Research and Analysis, Cybersecurity, Election
Hardware/Software Analysis, Election Voting System Versioning
Analysis, Voting Procedure Analysis, and Voting System
Certification Analysis

RESEARCH, DESIGN, AND EXPERIENCE

Material Handling Systems (conveyor):

Developed Gravity Flow, Powered, Hydraulic, Pneumatic, Logic Controller, and Structural Systems

Identification Readers:

Developed handheld computer that would read States Driver Licenses utilizing bar code, magnetic stripe, and other media where the captured data was stored in a database

Financial Instrument Sales and Support:

Direct sales of Insurance and other investment options

Consultant:

Business Analysts, Inventor, ACAD Design, Database Design and Analysis, Business Development, E-Commerce Website Design, Digital Media, Hardware/Software Development and Support, and Election Systems Design, Functionality, Analysis, and Development.

Military:

Nuclear, Biological, and Chemical Warfare Specialist
Battalion Supply Sergeant
Customs Clearance Officer
Casualty Reporting Officer
Heavy Transportation NCO
Sexual Abuse and Harassment Reporting Officer
Certifier of Hazardous Material Transportation

Computer Network Administrator (to include Generation 2 Long Haul Fiber, Layer 2 Routing Administration—Routers and Patch Panels, Cisco VOIP Systems, Computer and Printer Admin, Website Design, Blue Force Tracker Systems, Falcon GIS Navigation Systems, Digital Phased Array Communication Systems, ADTRAN Satellite Communication Systems, SIPR-NIPR-CENTRIX Military Network Administrator, Personnel Database

Military Continued:

Administrator, Microsoft Global User Network Administrator, Communications and Electronic Counter Measures Technician, and Help Desk Supervisor

Election Integrity

Researched and Analysis Election Systems Hardware and Software. Analysis Election related Logic such as Hardware Layout, Software Utilization, and Layout of Voting Centers.

Have served as a Poll Sheriff, Poll Judge, and Poll Worker in both Paper Based and current Machine Based Systems (ES&S).

Have aided in development of a secure Paper Based Ballot and Counting System.

Have Acquired and Analyzed Election Project Databases, Documents, System Files, and other Information...files such as Cast Vote Records (CVR), Ballot Review Files, Upload Files, other Data that is exported from ES&S Election Management Systems, and Master Voter Registration and Voter History (VRVH) Databases.

Have Analyzed the above Sources using differing mathematical methods such as Proportional Integral Derivative (PID) Controllers, Cubic Algorithmic Iterations, and other reverse methods to identify nonhuman patterns and violation of the Law of Large Number principles.