

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF HAMPTON)	C/A NO. 2021-CP-25-00392
)	
RENEE S. BEACH, PHILLIP BEACH,)	
ROBIN BEACH, SAVANNAH TUTEN,)	
and SETH TUTEN,)	
)	
Plaintiffs,)	
)	AFFIDAVIT OF VICKY WARD
v.)	
)	
GREGORY M. PARKER, GREGORY)	
M. PARKER, INC. d/b/a PARKER'S)	
CORPORATION, BLAKE GRECO,)	
JASON D'CRUZ, VICKY WARD,)	
MAX FRATODDI, HENRY ROSADO,)	
AND PRIVATE INVESTIGATION)	
SERVICES GROUP, LLC,)	
)	
Defendants.)	
)	

Personally appeared before me, Vicky Ward, who being duly sworn deposes and states as follows:

1. My name is Vicky Ward. I am over 18 years of age and a resident of the State of New York.
2. My full-time profession is as a journalist. My job is to report the news. I have been an employee of or contributor to numerous media outlets, including but not limited to, The New York Times, CNN, Vanity Fair, the New York Post, Discovery Plus, the Huffington Post, Town & Country, Esquire, the Financial Times, Bloomberg TV, CNBC and other news organizations. I have reported on numerous topics of national and international interest throughout my career.
3. After national public interest in the deaths and mysteries surrounding the Murdaugh family grew in 2021, I began working as an independent contractor in connection with a television

documentary that would report news on the subject. The documentary was produced by Blackfin production company. I am neither an employee nor an owner of Blackfin.

4. In the course of my work as a journalist gathering information for the documentary, I was provided with a copy of a video containing information related to Mallory Beach's death (the "Video"). I was not aware of the existence of the Video until I came into possession of it. I did not specifically seek out, solicit, or request the Video, nor did I pay for or make any promises or representations in exchange for the Video or in exchange for a license to use the Video. To the extent that I may have ever stated to anyone that "we" paid for or purchased the Video, it was merely an acknowledgement that, to my understanding, a license to use these materials in the documentary had been purchased by Blackfin. I was not involved in any such purchase or payment for license or acquisition of the Video.

5. The Video was shared with me by Gregg Roman ("Roman"), an executive producer of the documentary. It was provided to me on September 9, 2021, by means of a text message through the Signal messaging application that included a clickable hyperlink. I watched the Video on or around the day I received it by clicking on the hyperlink and accessing the Video.

6. From my communications with Roman, I understood, and continue to understand that Roman permitted me to disclose, as part of my reporting, that I had obtained it.

7. Attached as Exhibit A is a .pdf document containing excerpted messages from the text thread between myself and Roman. I sent the messages on the right side of the page, and Roman sent the messages on the left side of the page. The Video was accessible at the hyperlink that says https://app.degoo.com/share/RaiEVEkxEgkQ12?_branch_match_id=949354812446282823&ID=12873712370. To my knowledge, the Video is no longer accessible at that hyperlink, but the

hyperlink is still active in the electronic version of Exhibit A (with little or no substantive content at the destination webpage) and can actively be clicked.

8. As shown in Exhibit A, Roman texted me an email address containing his name in response to my message “what is your email?” I have emailed Roman at this email address and received responses. Also as shown in Exhibit A, at one point Roman sent me a hyperlink to a Zoom conference. When I joined the Zoom conference, I was viewing and speaking to Roman. On more than one occasion, I called the phone number, (202) 888-5432, displayed at the top of the first page of Exhibit A and conversed with Roman.

9. Exhibit A is redacted to remove other messages and information that I received in the newsgathering process that are not related to the content of the present affidavit and for which I continue to seek protection from disclosure under “reporter’s shield” laws, the First Amendment and similar protections.

10. Exhibit A is saved in .pdf format. Based on my recollection, the content of the messages as it appears in Exhibit A is the same as when the messages were originally sent between myself and Roman.

11. Attached as Exhibit B hereto is an electronic copy of the Video as I currently maintain it. Once the hyperlink to the Video from the original Signal message to me became inactive, I no longer had access to a copy of the Video. But I subsequently received an electronic copy from Blackfin, and have attached that as Exhibit B. I recognize the content of the Video from when I originally viewed it.

12. At the time I received the Video, I was unaware that there was a possibility that possession or use of the Video might be in violation of any law or court rules.

13. In the course of my work as a journalist gathering information for the documentary, copies of certain photographs of Mallory Beach's body taken during its recovery by law enforcement (the "Photos") were shared with me. I was not aware of the existence of the Photos until I came into possession of them. I did not specifically seek out, solicit, or request the Photos, nor did I pay for or make any promises or representations in exchange for the Photos or in exchange for a license to use the Photos. I was not involved in any purchase or payment for any license or acquisition of the Photos.

14. The Photos were provided in JPEG format by Roman on or about September 13, 2021. Attached as Exhibit C hereto are electronic copies of the Photos as I have kept them.

15. I did not and have never made any promise or any representation to anyone that the Video or Photos would be used in any manner or for any purpose. Neither at the time the Video or Photos were shared with me, nor at any other time, did I discuss with anyone anything about harming the Beach family or attempting in any manner to affect or influence the members of the Beach family in their wrongful death lawsuit. My sole purpose in all aspects of my working on the documentary was to report the news and nothing more.

16. According to the Complaint in this lawsuit, around November 24, 2021, a trailer for the documentary was posted on the Internet prior to the release of the documentary. I did not participate in nor was I involved in the assembly of the trailer or the selection of its content, including any use of the Photos or Video. I did not participate in and was not involved in the publication of the trailer on the Internet.

17. I have never had any connection to Gregory M. Parker, Gregory M. Parker, Inc. d/b/a Parker's Corporation, Blake Greco, Jason D'Cruz, Max Frattodi, Henry Rosado, or Private Investigation Services Group, LLC outside of my newsgathering work on the documentary. I have

never had any personal interest in the outcome of any lawsuit that Gregory Parker or his business is involved in regarding Mallory Beach's death. I have never had any interest, motive, or agenda with respect to the foregoing parties or their affairs in any fashion outside of their relevance, if any, to a newsworthy topic of great public interest.

18. I have never met with any of the plaintiffs in this case—Renee S. Beach, Phillip Beach, Robin Beach, Savannah Tuten, or Seth Tuten—outside of the present lawsuit. I do not know anything about them except for the information I gathered in working on the documentary. I have never had any connection to them outside of the documentary. I have never had any personal interest in the outcome of any lawsuit they are involved in regarding Mallory Beach's death. I have never had any interest, motive, or agenda with respect to them personally or in any fashion outside of their relevance, if any, to a newsworthy topic of great public interest. I have always sympathized with the Beach family greatly for their terrible loss and wanted their viewpoints considered, which is why I reached out to their attorney and asked him about the Video.

19. My subscription to this affidavit is done strictly to defend myself against the claims of liability in the present lawsuit. My intent is not to knowingly or voluntarily waive any privilege under the First Amendment or any "reporter's shield" or similar law or any rights concerning disclosure of any information obtained in the newsgathering process. To the extent any waiver is found, I expressly limit the waiver to the specific information contained in this affidavit and nothing further.

FURTHER AFFIANT SAYETH NAUGHT.



Vicky Ward