

# **EXHIBIT A**

FITSNEWS

STATE OF SOUTH CAROLINA )

)

**AFFIDAVIT of WILLIAM BECKHAM**

COUNTY OF KERSHAW )

)

I William Beckham, being an adult over the age of eighteen (18) and of sound mind and body and with personal knowledge of the matters set forth herein do hereby aver as follows:

1. I am a citizen and resident of Kershaw County, South Carolina and have been for most of my life.

2. I was born on December 31, 1946 and am 77 years old.

3. I have personal knowledge of Lake Wateree. My family owned one of the first cabins on the Lake after the dam was constructed.

4. I would spend summer Sundays during my childhood at my family's cabin at Beaver Creek on Lake Wateree.

5. In 1965, when I was in high school, I was hired by Duke to administer the mosquito program on Lake Wateree.

6. I was one of a handful or so of summer associates and was paid \$2.60 per hour, which I believe was more than minimum wage at the time.

7. Mr. George Swearingen was one of my first supervisors.

8. Mr. Swearingen was my supervisor during the summers of 1966 and 1967.

9. In my job, I was told to load two 55-gallon barrels of a substance onto a 15 to 18 foot aluminum boat and then put that substance into the water around and in the Lake focusing on areas of stagnant water.

10. We were supposed to go from dam to dam and pay specific attention to areas where the water appeared stagnant.

11. It would take all day to put out the 110 gallons.

12. When I showed up for work, the barrels had already been filled and were housed at a Lake Wateree shoreline property owned by Duke Energy.

13. My family's property was adjacent to the Duke Energy property.

14. My supervisors specifically told me to put the substance in the barrels into the water throughout the lake.

15. I recall that the substance in the barrels smelled like motor oil, and was brown to golden-brown in color.

16. I also recall sometimes that the substance in the barrels would have sludge-like thick pieces. When we saw these pieces, they would be almost black in color.

17. Treating the whole lake took about a week, and we would treat the lake every week during the summer for about ten (10) weeks.

18. We distributed about 500 gallons of used oil per week.

19. I worked this job every summer from 1965 through 1967 and would come back periodically after that as needed.

20. My brother was hired to do the same job, which he worked for four consecutive summers in the 1970s.

FURTHER AFFIANT SAYETH NAUGHT.

William Beckham  
William Beckham

Signed before me this 24<sup>th</sup> day of March, 2024

Ann S. Work  
Notary Public  
My Commission Expires: 9/1/33