

STATE OF SOUTH CAROLINA) AFFIDAVIT OF
COUNTY of RICHLAND) WILLIAM RANDOLPH FOLKS, III


Personally appeared before me, William Randolph Folks, III, and after being duly sworn deposes and testifies as follows:

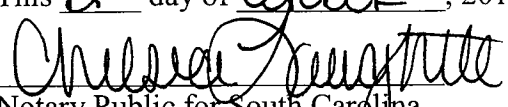
1. I am over the age of eighteen (18) and competent to make the following statement.
2. I make this affidavit of my own personal knowledge.
3. I am a resident of Richland County, S.C.
4. I was employed by S.C. Rep. Nikki Haley from early 2007 until March of 2008 as a communications consultant. As I have stated publicly, during that time Rep. Haley and I engaged in an inappropriate physical relationship that included numerous instances of inappropriate sexual contact.
5. Representative Haley and I shared our first kiss while sitting in her parked car outside of MacDougal's restaurant and bar in downtown Columbia, S.C. This kiss took place in early 2007 following an evening with friends at the nearby Liberty Taproom. After this first kiss, Rep. Haley drove us to the parking lot behind the neighborhood center at Emily Douglas Park where we parked for approximately forty-five minutes. There we slid back the seats of her Cadillac SUV so that Rep. Haley could climb on top of me.
6. After this first romantic encounter, Rep. Haley and I saw each other again repeatedly during the Spring of 2007. Most of these encounters took place at my apartment located at 2610 Lee Street in downtown Columbia. A few other

romantic encounters occurred in her SUV (including one in the parking lot of the S.C. Policy Council) and in her State House office.

7. Rep. Haley and I also went out in public together on several occasions. While we usually met at Bar None in Five Points, we occasionally met at The Back Porch restaurant on Gervais Street across from the Clarion Town House hotel. We generally associated with my friend Kenny Boggs, a computer programmer, and Lewis Gossett, who is president of the S.C. Manufacturers' Alliance. Mr. Boggs was aware of my relationship with Rep. Haley, while Mr. Gossett was not.
8. My physical relationship with Rep. Haley ended in June of 2007 when I began dating the former Katrina Marie Steinborn, who is now my wife. Rep. Haley specifically requested that I notify her in the event this relationship was getting serious so that she could "back off."
9. However, shortly after I informed Rep. Haley that my relationship with Katrina was "getting serious," Rep. Haley presented me with the allegation that my future wife had been unfaithful to her previous husband in her first marriage. This allegation was made in the context of a request I had made of Rep. Haley to assist me in getting an order of protection for my future wife against her ex-husband.
10. Rep. Haley eventually "backed off." As phone records confirm, we remained in contact. During one of our late night phone calls, Rep. Haley informed me that she wanted to confide in Eleanor Kitzman, who was serving as the Director for the South Carolina Department of Insurance, about our affair because she was hurt and had no one to talk to about it.

11. In addition to our phone calls, Rep. Haley and I exchanged numerous emails and text messages after the affair ended. I deliberately deleted these messages at the time because I had failed to honestly answer my wife's questions about my relationship with Rep. Haley.
12. Early in 2009, however, one of my late-night text message exchanges with Rep. Haley was intercepted by my wife while I was in the shower. My wife took the liberty of responding to Rep. Haley with the following text message:
13. "This is Katrina. Keep it business only."
14. The most recent text message exchange between myself and Rep. Haley that referenced our prior relationship took place on January 3, 2010 between 12:22 A.M. and 1:05 A.M. while I was in Birmingham, Alabama away from my family.
15. It is my opinion that if Rep. Haley would allow a forensic examination of the State provided laptop and/or desktop that she used between the dates of early 2007 and 2009 that it will contains emails confirming what is set forth herein.


William Randolph Folks, III

SWORN AND SUBSCRIBED to me
This 6th day of October, 2010.

Notary Public for South Carolina
My Commission Expires: 9/1/2019

