

4. The alleged questions of law are pertinent to all registered voters in South Carolina and in particular to this Plaintiff; that Plaintiff provided personal information data in order to become a registered voter in Calhoun County, South Carolina.

5. That this action relates to a matter of public interest.

6. Jurisdiction and venue are proper with this Court, the Richland County Court of Common Pleas, pursuant to South Carolina Code § 15-53-20 *et seq.*

7. On or about August 6, 2025, the Civil Rights Division of the United States Department of Justice (hereinafter “USDOJ”) emailed a letter to the Executive Director of Defendant SCEC, requesting that Defendant SCEC turnover to USDOJ the “South Carolina’s statewide voter registration list and information”, a copy of which is attached hereto and made apart hereof.

8. On or about August 14, 2025, USDOJ emailed a follow-up letter to Defendant SCEC’s Executive Director clarifying that USDOJ was requesting every registered voter’s “full name, date of birth, residential address, his or her state driver’s license number or the last four digits of the registrant’s social security number”, a copy of which is attached hereto and made apart hereof.

9. That Defendant SCEC has recognized the significant privacy laws involved and committed to fulfill its statutory limitations to protect private information and shared voter information with USDOJ only pursuant to a memorandum of understanding containing necessary security safeguards to ensure the proper and confidential use of that data in its transmission.

10. That Defendant SCEC has not transmitted the requested information since USDOJ first requested the information in early August 2025.

11. That Defendant SCEC has previously entered into memorandums of understanding when exercising its statutory authority to share voter records; That it is the standard practice of Defendant SCEC in those memorandums of understanding to outline the limited purpose for which the shared voter information will be used and to outline the steps being taken to protect the confidentiality of that data upon disclosure; That said previous memorandums of understanding ordinarily set forth data use limitation, provide security transmission protocols, and provide storage and destruction procedures.

12. That any memorandum of understanding entered by Defendant SCEC with USDOJ should include the same limitations and security protocols as is typical of previous memorandum of understanding used by Defendant SCEC.

13. Pursuant to South Carolina Code § 15-53-120, the Court should conduct a merits hearing and issue an injunction enjoining Defendant SCEC from any further actions related to the release of the South Carolina statewide voter registration list containing Plaintiff's personal information data, unless and until a perfected memorandum of understanding is negotiated with USDOJ setting forth (1) data use restrictions of voter information being provided to ensure that the data is only used in a manner allowed by South Carolina law; (2) safeguards against the release or sharing of the voter information to third parties; (3) secure transmission protocols regarding the voter information data being shared; and (4) storage and destruction procedures to ensure confidentiality of the South Carolina voter data being shared.

WHEREFORE, having fully set forth her Amended Complaint above, Plaintiff prays that this Honorable Court enjoin Defendant South Carolina Election Commission, as set forth above, along with any further relief the Court deems just and proper.

Date: October 24, 2025
Orangeburg, South Carolina

s/ C. Bradley Hutto
C. Bradley Hutto, S.C. Bar No. 6436
Skyler B. Hutto, S.C. Bar No. 102741
WILLIAMS & WILLIAMS ATTORNEYS AT LAW
Post Office Box 1084
Orangeburg, SC 29116
Tel: (803) 534-5218
Email: cbhutto@williamsattys.com
Email: skyler@williamsattys.com

RETRIEVED FROM DEMOCRACYDOCKET.COM