

EXHIBIT

18

STATE OF SOUTH CAROLINA)
)
)
COUNTY OF RICHLAND)

AFFIDAVIT OF
CHRISTOPHER J. WATKINS

PERSONALLY appeared before me, Christopher J. Watkins, who after being duly sworn, deposes and says as follows:

1. My name is Christopher Watkins, and I am over the age of 18 and am competent to testify to the representations made herein, which are based on my personal knowledge.

2. I am a SLED Licensed Investigator, and I have an educational background in Computer Science, Information Technology, Computer Programming, and Systems Engineering for Hardware and Software. I am recognized as a Certified Forensic Computer Examiner (CFCE) by the International Association of Computer Investigative Specialists (IACIS), which is, in turn, accredited by the Forensic Specialties Accreditation Board (FSAB). The FSAB is an independent organization established to accredit professional bodies that certify forensic scientists. I am also an associate member of the IACIS and a member of the American Society of Digital Forensics & eDiscovery.

3. Since 2010, I have worked as a Licensed Private Investigator in South Carolina. From 2010 to 2016, I worked as a SLED Licensed Investigator for Stillinger Investigations. In 2016, I founded my own company, Watkins Digital Forensic & Investigations, and in 2019, I founded a second company, Certified Computer Forensics, LLC. In these positions, I have completed hundreds of digital forensic investigations involving computer systems, computer networks, servers, and various cellular and digital devices. These investigations involved the disciplined use of specialized methods and techniques, adhering to the scientifically accepted standards and practices for recovery, authentication and analysis of electronically stored information, reconstruction of computer usage, examination of residual data, authentication of data by technical analysis, and explanation of technical features of data and computer usage.

4. Since 2014, I have been qualified twenty-nine (29) times as an expert in matters of Digital Forensic Science in the South Carolina Family Court, General Sessions Court, and Court of Common Pleas, and in the United States District Court for the District of South Carolina.

5. On March 20, 2023, Attorney Ashby Jones from the Kinard and Jones, LLC law firm reached out to me, seeking to engage my services as an expert in digital forensic science to perform a forensic acquisition and preservation of electronic devices belonging to Megan Cronin, including one (1) Apple MacBook Air, one (1) Apple iPhone 12, and one (1) Apple iPad Generation 3.

6. On April 5, 2023, Mrs. Megan Cronin came into my office, located at 1416 Park Street, Columbia, SC, and signed over two (2) electronic devices to me so that they could be forensically processed. The two (2) electronic devices that were provided were not an Apple MacBook Air, an Apple iPhone 12 and an Apple iPad Generation 3. Instead, the devices that were provided were an Apple iPhone 14 (serial identifier: G4PJHN9G1C) and a Lenovo Yoga 7 laptop computer (serial identifier PF491QB3).

7. I provided this information via email to Attorney Jones and Attorney Andrew Farley on the same day, April 5, 2023.

8. As of the date of this affidavit, June 22, 2023, my office has not received the Apple MacBook Air, Apple iPhone 12 and Apple iPad Generation 3.

FURTHER, YOUR DEPONENT SAYETH NAUGHT.



Christopher J. Watkins

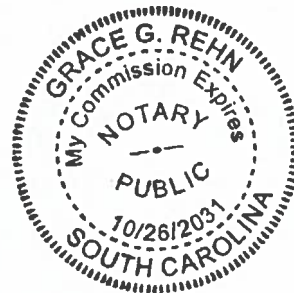
Sworn to and subscribed before me

this 22nd day of June, 2023.



Notary Public for the State of South Carolina

My Commission Expires: 10/26/2031



RE: Cronin v. Cronin

Wed 4/5/2023 4:51 PM

From: Ashby Jones ashby@kinardandjones.com

To: Christopher J. Watkins chris@cc4n6.com

Cc: Andrew Farley <andrew@afarleylaw.com>; Emily Looney <emily@kinardandjones.com>;
ALJ Team aljteam@kinardandjones.com

This is what should have been provided:

IPad (Generation 3) a MacBook laptop (not a Lenovo Yoga 7) and an iPhone 12 (Not an iPhone 14)

Andy please get with your client and have her cooperate and turn over the correct devices.

Ashby Lawton Jones
Fellow, American Academy of Matrimonial Lawyers
Board Certified in Family Law, National Board of Trial Advocacy
Chair, Family Law Section, South Carolina Association for Justice
Kinard and Jones, LLC
808 South Lake Drive
Lexington, South Carolina 29072
(803) 359-1003 Phone
ashby@kinardandjones.com
www.kinardandjones.com
www.aaml.org