

STATE GRAND JURY OF SOUTH CAROLINA

STATE OF SOUTH CAROLINA,

v.

TRAVIS ANTONIO BRADDY,

Defendant.

FILED

SEP 15 2022

MARGARET J. SELF
CLERK, SC STATE GRAND JURY

Case No. 2022-GS-47-30

INDICTMENT FOR:

**MISCONDUCT IN OFFICE
(1 COUNT);**

**EMBEZZLEMENT
LESS THAN \$10,000
(3 COUNTS)**

**EMBEZZLEMENT
MORE THAN \$10,000
(1 COUNT)**

**USE OF OFFICIAL POSITION FOR
PERSONAL GAIN
(4 COUNTS);**

**FORGERY
(3 COUNTS)**

At a session of the State Grand Jury of South Carolina, convened in Columbia, South Carolina, on September 15, 2022, the State Grand Jurors present upon their oath and charge as follows:

**COUNT ONE
MISCONDUCT IN OFFICE
(Common Law – CDR 0819)**

That from on or about November 13, 2020, to on or about June 25, 2021, TRAVIS ANTONIO BRADDY did, in Richland County, while a Procurement Manager for Richland County School District One, a public official, willfully and dishonestly fail to

properly and faithfully discharge the duties of his public office imposed upon him by law;
to wit:

BRADDY, while a Procurement Manager for Richland County School District One, by various oral and written fraudulent representations and concealments, abused his office to circumvent procurement policies and internal controls at the school district in order to use public funds to procure goods, services, and money for his personal benefit and the benefit of others connected to him, including but not limited to hotel rooms, a rental SUV, and money. Therefore, BRADDY did, by malfeasance, misfeasance, and nonfeasance, commit acts and omissions in breach of his duties of good faith, honesty, and accountability to the public.

This done in violation of the Common Law of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

**COUNT TWO
EMBEZZLEMENT, VALUE LESS THAN \$10,000
(S.C. Code Ann. § 16-13-210 – CDR 3460)**

That from on or about November 13, 2020, to on or about November 24, 2020, TRAVIS ANTONIO BRADDY did, in Richland County, while a Procurement Manager for Richland County School District One, an officer and person charged with the safekeeping, transfer, and disbursement of public funds, embezzle such funds; to wit:

BRADDY abused his position as Procurement Manager and the trust of his colleagues to circumvent procurement policies and internal controls at the school district in order to embezzle public funds for his personal gain. Upon hire, BRADDY was

specifically tasked with obtaining personal protective equipment (PPE) for use by the school district during the height of the COVID-19 pandemic. Instead, BRADDY used his apparent authority as a Procurement Manager to set up an account for the district at a Hilton Garden Inn, through which he procured multiple group bookings for his personal use and benefit with no valid justification. BRADDY misrepresented to his superiors and colleagues that he required the use of a district purchasing card (P-Card) in order to quickly purchase excess PPE he discovered was available at the hotel. BRADDY was temporarily granted the use of a supervisor's P-Card for the purpose of paying the hotel for its excess PPE, but which BRADDY actually used to pay for his stay at the hotel. BRADDY later created and presented fraudulent invoices consistent with his fabricated story in order to reconcile and validate the use of the P-Card, thereby concealing his theft. Through this scheme, BRADDY embezzled \$1,206.30 in public funds.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

COUNT THREE
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)

That on or about November 13, 2020, to on or about November 24, 2020, TRAVIS ANTONIO BRADDY did, in Richland County, while a Procurement Manager for Richland County School District One, a public official, knowingly use his official office to

obtain an economic interest for himself, a family member, an individual with whom he is associated, and a business with which he is associated; to wit:

BRADDY abused his position as Procurement Manager and the trust of his colleagues to circumvent procurement policies and internal controls at the school district in order to embezzle public funds for his personal gain. Upon hire, BRADDY was specifically tasked with obtaining personal protective equipment (PPE) for use by the school district during the height of the COVID-19 pandemic. Instead, BRADDY used his apparent authority as a Procurement Manager to set up an account for the district at a Hilton Garden Inn, through which he procured multiple group bookings for his personal use and benefit with no valid justification. BRADDY misrepresented to his superiors and colleagues that he required the use of a district purchasing card (P-Card) in order to rapidly purchase excess PPE he discovered was available at the hotel. BRADDY was temporarily granted the use of a supervisor's P-Card for the purpose of paying the hotel for its excess PPE, but which BRADDY actually used to pay for his stay at the hotel. BRADDY later created and presented fraudulent invoices consistent with his fabricated story in order to reconcile and validate the use of the P-Card, thereby concealing his theft. Through this scheme, BRADDY used his official position for the unlawful financial gain of \$1,206.30 in public funds.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

COUNT FOUR
FORGERY, VALUE LESS THAN \$10,000
(S.C. Code Ann. § 16-13-10 – CDR 3436)

That on or about some time in November 2020, TRAVIS ANTONIO BRADDY did, in Richland County, falsely make, forge, and counterfeit; cause and procure to be falsely made, forged, and counterfeited; and willfully acted and assisted in the false making, forging, and counterfeiting of writings and instruments of writings; to wit:

BRADDY willfully and fraudulently forged an invoice from Hilton Garden Inn Columbia/Harbison to fraudulently represent that BRADDY used his supervisor's Richland County School District One purchasing card (P-Card) to purchase personal protective equipment (PPE), and thereafter submitted the forgery to the school district in order to conceal the actual use of the funds to pay for BRADDY's stay at the hotel. BRADDY's forgery facilitated the embezzlement of \$1,206.30.

This done in violation of Section 16-13-10 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

COUNT FIVE
EMBEZZLEMENT, VALUE LESS THAN \$10,000
(S.C. Code Ann. § 16-13-210 – CDR 3460)

That on or about December 22, 2020, TRAVIS ANTONIO BRADDY did, in Richland County, while a Procurement Manager for Richland County School District One, an officer and person charged with the safekeeping, transfer, and disbursement of public funds, embezzle such funds; to wit:

BRADDY abused his position as Procurement Manager and the trust of his colleagues to circumvent procurement policies and internal controls at the school district in order to embezzle public funds for his personal gain. Upon hire, BRADDY was specifically tasked with obtaining personal protective equipment (PPE) for use by the school district during the height of the COVID-19 pandemic. Instead, BRADDY used his apparent authority as a Procurement Manager to set up an account for the district at a Hilton Garden Inn, through which he procured multiple group bookings for his personal use and benefit with no valid justification. BRADDY misrepresented to his superiors and colleagues that he required the use of a district purchasing card (P-Card) in order to quickly purchase excess PPE he discovered was available at the hotel. BRADDY was assigned his own P-Card to fulfill his assigned duties, to include paying the hotel for its excess PPE, but which BRADDY actually used to pay for his stay at the hotel. BRADDY later created and presented fraudulent invoices consistent with his fabricated story in order to reconcile and validate the use of the P-Card, thereby concealing his theft. Through this scheme, BRADDY embezzled \$2,151.86 in public funds.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

COUNT SIX
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)

That on or about December 22, 2020, TRAVIS ANTONIO BRADDY did, in Richland County, while a Procurement Manager for Richland County School District One, a public official, knowingly use his official office to obtain an economic interest for himself, a family member, an individual with whom he is associated, and a business with which he is associated; to wit:

BRADDY abused his position as Procurement Manager and the trust of his colleagues to circumvent procurement policies and internal controls at the school district in order to embezzle public funds for his personal gain. Upon hire, BRADDY was specifically tasked with obtaining personal protective equipment (PPE) for use by the school district during the height of the COVID-19 pandemic. Instead, BRADDY used his apparent authority as a Procurement Manager to set up an account for the district at a Hilton Garden Inn, through which he procured multiple group bookings for his personal use and benefit with no valid justification. BRADDY misrepresented to his superiors and colleagues that he required the use of a district purchasing card (P-Card) in order to rapidly purchase excess PPE he discovered was available at the hotel. BRADDY was assigned his own P-Card to fulfill his assigned duties, to include paying the hotel for its excess PPE, but which BRADDY actually used to pay for his stay at the hotel. BRADDY later created and presented fraudulent invoices consistent with his fabricated story in order to reconcile and validate the use of the P-Card, thereby concealing his theft. Through this scheme, BRADDY used his official position for the unlawful financial gain of \$2,151.86 in public funds.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

**COUNT SEVEN
FORGERY, VALUE LESS THAN \$10,000
(S.C. Code Ann. § 16-13-10 – CDR 3436)**

That on or about some time in December 2020, TRAVIS ANTONIO BRADDY did, in Richland County, falsely make, forge, and counterfeit; cause and procure to be falsely made, forged, and counterfeited; and willfully acted and assisted in the false making, forging, and counterfeiting of writings and instruments of writings; to wit:

BRADDY willfully and fraudulently forged an invoice from Hilton Garden Inn Columbia/Harbison to misrepresent that BRADDY used his Richland County School District One purchasing card (P-Card) to purchase personal protective equipment (PPE), and thereafter submitted the forgery to the school district in order to conceal the actual use of funds to pay for BRADDY's stay at the hotel. BRADDY's forgery facilitated the embezzlement of \$1,651.86.

This done in violation of Section 16-13-10 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

COUNT EIGHT
FORGERY, VALUE LESS THAN \$10,000
(S.C. Code Ann. § 16-13-10 – CDR 3436)

That on or about some time in February 2021, TRAVIS ANTONIO BRADDY did, in Richland County, falsely make, forge, and counterfeit; cause and procure to be falsely made, forged, and counterfeited; and willfully acted and assisted in the false making, forging, and counterfeiting of writings and instruments of writings; to wit:

BRADDY willfully and fraudulently forged an invoice from Hilton Garden Inn Columbia/Harbison to misrepresent that BRADDY used his Richland County School District One purchasing card (P-Card) to purchase personal protective equipment (PPE), and thereafter submitted the forgery to the school district in order to conceal the actual use of funds to pay for BRADDY's stay at the hotel. BRADDY's forgery facilitated the embezzlement of \$500.00.

This done in violation of Section 16-13-10 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

COUNT NINE
EMBEZZLEMENT, VALUE MORE THAN \$10,000
(S.C. Code Ann. § 16-13-210 – CDR 3459)

That from on or about December 11, 2020, to on or about June 25, 2021, TRAVIS ANTONIO BRADDY did, in Richland County, while a Procurement Manager for Richland County School District One, an officer and person charged with the safekeeping, transfer, and disbursement of public funds, embezzle such funds; to wit:

BRADDY abused his position as Procurement Manager and the trust of his colleagues to embezzle public funds for his personal gain. During the height of the COVID-19 pandemic, BRADDY was granted authorization to rent a box truck to supplement the school district fleet and support delivery of personal protective equipment (PPE) throughout the district. Instead, BRADDY used the purchase order and associated funds to rent a 2020 GMC Yukon for his personal use and benefit. BRADDY continued to possess and use the vehicle beyond the end of his employment, and beyond the original limitations of the purchase order on which he relied. Through this scheme, BRADDY embezzled \$10,424.25 in public funds.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

**COUNT TEN
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)**

That from on or about December 11, 2020, to on or about June 25, 2021, TRAVIS ANTONIO BRADDY did, in Richland County, while a Procurement Manager for Richland County School District One, a public official, knowingly use his official office to obtain an economic interest for himself, a family member, an individual with whom he is associated, and a business with which he is associated; to wit:

BRADDY abused his position as Procurement Manager and the trust of his colleagues to embezzle public funds for his personal gain. During the height of the

COVID-19 pandemic, BRADDY was granted authorization to rent a box truck to supplement the school district fleet and support delivery of personal protective equipment (PPE) throughout the district. Instead, BRADDY used the purchase order and associated funds to rent a 2020 GMC Yukon for his personal use and benefit. BRADDY continued to possess and use the vehicle beyond the end of his employment, and beyond the original limitations of the purchase order on which he relied. Through this scheme, BRADDY used his official position for the unlawful financial gain of \$10,424.25 in public funds.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

**COUNT ELEVEN
EMBEZZLEMENT, VALUE LESS THAN \$10,000
(S.C. Code Ann. § 16-13-210 – CDR 3460)**

That on or about April 19, 2021, TRAVIS ANTONIO BRADDY did, in Richland County, while a Procurement Manager for Richland County School District One, an officer and person charged with the safekeeping, transfer, and disbursement of public funds, embezzle such funds; to wit:

BRADDY abused his position as Procurement Manager and the trust of his colleagues to embezzle public funds for his personal gain and to the benefit of a closely related party. Upon hire, BRADDY was specifically tasked with obtaining personal protective equipment (PPE) for use by the school district during the height of the

COVID-19 pandemic. BRADDY used his apparent authority as a Procurement Manager to negotiate the donation of a substantial quantity of PPE from an industrial manufacturer to the school district. Shortly after he received the PPE on behalf of the school district, BRADDY generated a purchase order for similar PPE from a false company under the control of a person known and closely connected to BRADDY. A concerned supervisor reviewed the purchase order and instructed BRADDY to cancel it, but BRADDY instead circumvented procurement policies and internal controls through misrepresentations to his superiors and colleagues, and caused immediate payment to the false company. BRADDY further attempted to cause school district staff to misidentify the donated PPE as from the false company, so as to conceal his fraud, but was rebuffed by warehouse staff. No PPE was ever delivered by the false company. Through this scheme, BRADDY embezzled \$9,388.00 in public funds.

This done in violation of Section 16-13-210 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

**COUNT TWELVE
USE OF OFFICIAL POSITION OR OFFICE FOR FINANCIAL GAIN
ETHICS ACT VIOLATION
(S.C. Code Ann. § 8-13-700(A) – CDR 0673)**

That on or about April 19, 2021, TRAVIS ANTONIO BRADDY did, in Richland County, while a Procurement Manager for Richland County School District One, a public official, knowingly use his official office to obtain an economic interest for himself, a

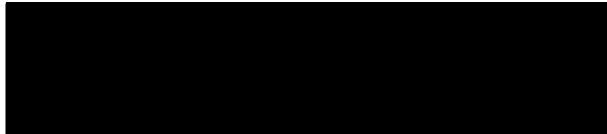
family member, an individual with whom he is associated, and a business with which he is associated; to wit:

BRADDY abused his position as Procurement Manager and the trust of his colleagues to embezzle public funds for his personal gain and to the benefit of a closely related party. Upon hire, BRADDY was specifically tasked with obtaining personal protective equipment (PPE) for use by the school district during the height of the COVID-19 pandemic. BRADDY used his apparent authority as a Procurement Manager to negotiate the donation of a substantial quantity of PPE from an industrial manufacturer to the school district. Shortly after BRADDY received the PPE on behalf of the school district, BRADDY generated a purchase order for similar PPE from a false company under the control of a person known and closely connected to BRADDY. A concerned supervisor reviewed the purchase order and instructed BRADDY to cancel it, but BRADDY instead circumvented procurement policies and internal controls through misrepresentations to his superiors and colleagues, and caused immediate payment to the false company. BRADDY further attempted to cause school district staff to misidentify the donated PPE as from the false company, so as to conceal his fraud, but was rebuffed by warehouse staff. No PPE was ever delivered by the false company. Through this scheme, BRADDY used his official position for the unlawful financial gain of \$9,388.00 in public funds.

This done in violation of Sections 8-13-700(A) and 8-13-1520 of the Code of Laws of South Carolina, such conduct involving public corruption and arising out of or in connection with a crime involving public corruption, and such conduct not having been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case
made and provided.

A true Bill



FOREPERSON

Alan Wilson

ALAN WILSON (jejj)
ATTORNEY GENERAL