

STATE GRAND JURY OF SOUTH CAROLINA

STATE OF SOUTH CAROLINA,)	Case No: <u>2022-GS-47-24</u>
)	
)	
)	
v.)	INDICTMENT FOR
)	OBTAINING SIGNATURE OR PROPERTY
)	BY FALSE PRETENSES,
)	MONEY LAUNDERING, AND
)	COMPUTER CRIME
RICHARD ALEXANDER MURDAUGH,)	
)	
Defendant.)	
_____)	

At a session of the State Grand Jury of South Carolina, convened in Columbia, South Carolina, on August 16, 2022, the State Grand Jurors present upon their oath and charge as follows:

COUNT ONE
OBTAINING SIGNATURE OR PROPERTY BY FALSE PRETENSES
VALUE \$10,000 OR MORE
S.C. Code Ann. §16-13-240(1)
CDR Code: 3471

That RICHARD ALEXANDER MURDAUGH did, in Colleton County, on or about December 16, 2020, by false pretenses or representation obtain the signature of a person to a written instrument and money or other property from another person, with the intent to cheat or defraud that person of money or property, to wit:

MURDAUGH created a bank account under the name "Richard A Murdaugh Sole Prop DBA Forge". He created this account for the purpose of misappropriating funds belonging to others with the illusion that the money was being paid to the legitimate settlement planning company Forge Consulting, LLC. MURDAUGH then caused a check

for \$91,867.50, which represented the legal fees due in a case to MURDAUGH's law firm, Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED), to be disbursed from the client trust account to "Forge" as "Settlement Proceeds" rather than following the normal practice of having a trust account check written for fees and deposited to the operating account of MURDAUGH's law firm, PMPED. MURDAUGH had not informed PMPED he was bypassing paying the fees into the firm as he was required to do, and MURDAUGH did not structure the fees with the legitimate company Forge Consulting, LLC. MURDAUGH instead deposited the check on or about December 16, 2020 into the "Forge" account he controlled, and used this money for his own personal use, for expenses including but not limited to credit card payments, transfers to family members, overdraft charges, and checks written to associates.

All in violation of section 16-13-240 of the South Carolina Code of Laws, and such conduct involving a violation of the South Carolina Anti-Money Laundering Act, or a crime related to a violation of the Anti-Money Laundering Act, and such conduct also involving a crime involving computer crimes, or a conspiracy or solicitation to commit a crime involving computer crimes, and such conduct having not been authorized by law.

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

COUNT TWO
MONEY LAUNDERING
VALUE \$20,000 OR MORE BUT LESS THAN \$100,000
S.C. Code Ann. §35-11-740
CDR Code: 3938

That RICHARD ALEXANDER MURDAUGH, in Colleton County, between on or about December 16, 2020 and on or about January 15, 2021, did conduct financial transactions with property that he knew was the proceeds of, or was derived directly or indirectly from the proceeds of, unlawful activity, and he conducted these transactions with the intent to promote the carrying on of unlawful activity, and while knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, sources, ownership, or control of the proceeds of unlawful activity, to wit:

MURDAUGH caused a \$91,867.50 check which represented the legal fees due in a case to MURDAUGH's law firm, Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED), to be disbursed from the client trust account to "Forge" as "Settlement Proceeds" rather than following the normal practice of having a trust account check for fees written to the operating account MURDAUGH's law firm, PMPED. Instead, MURDAUGH deposited the check on or about December 16, 2020 into a "Forge" account under his control that he created to facilitate the illusion that funds were being sent to the legitimate company Forge Consulting, LLC, and engaged in financial transactions to convert the money to personal use, including withdrawing cash, making online transfers, and writing checks to associates. These transactions exceeded \$20,000 but were less than \$100,000 in a twelve month period.

All in violation of section 35-11-740 of the South Carolina Code of Laws, and such

conduct involving a violation of the South Carolina Anti-Money Laundering Act, or a crime related to a violation of the Anti-Money Laundering Act, and such conduct also involving a crime involving computer crimes, or a conspiracy or solicitation to commit a crime involving computer crimes, and such conduct having not been authorized by law.

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

**COUNT THREE
OBTAINING SIGNATURE OR PROPERTY BY FALSE PRETENSES
VALUE \$10,000 OR MORE
S.C. Code Ann. §16-13-240(1)
CDR Code: 3471**

That RICHARD ALEXANDER MURDAUGH did, in Colleton County, on or about May 12, 2021, by false pretenses or representation obtain the signature of a person to a written instrument and money or other property from another person, with the intent to cheat or defraud that person of money or property, to wit:

MURDAUGH created a bank account under the name "Richard A Murdaugh Sole Prop DBA Forge". He created this account for the purpose of misappropriating funds belonging to others with the illusion that the money was being paid to the legitimate settlement planning company Forge Consulting, LLC. MURDAUGH then caused a check for \$83,333.33, which represented the legal fees due in a case to MURDAUGH's law firm, Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED), to be disbursed from the client trust account to "Forge Consulting, LLC" as "Structured Fee" rather than following the normal practice of having a trust account check written for fees and deposited to the

operating account of MURDAUGH's law firm, PMPED. MURDAUGH had not informed PMPED he was bypassing paying the fees into the firm as he was required to do, and MURDAUGH did not structure the fees with the legitimate company Forge Consulting, LLC. MURDAUGH instead deposited the check on or about May 12, 2021 into the "Forge" account he controlled, and used this money for his own personal use, for expenses including but not limited to credit card payments, transfers to family members, overdraft charges, and checks written to associates.

All in violation of section 16-13-240 of the South Carolina Code of Laws, and such conduct involving a violation of the South Carolina Anti-Money Laundering Act, or a crime related to a violation of the Anti-Money Laundering Act, and such conduct also involving a crime involving computer crimes, or a conspiracy or solicitation to commit a crime involving computer crimes, and such conduct having not been authorized by law.

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

**COUNT FOUR
MONEY LAUNDERING
VALUE \$20,000 OR MORE BUT LESS THAN \$100,000
S.C. Code Ann. §35-11-740
CDR Code: 3938**

That RICHARD ALEXANDER MURDAUGH, in Colleton County, between on or about May 12, 2021 and on or about July 16, 2021, did conduct financial transactions with property that he knew was the proceeds of, or was derived directly or indirectly from the proceeds of, unlawful activity, and he conducted these transactions with the intent to

promote the carrying on of unlawful activity, and while knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, sources, ownership, or control of the proceeds of unlawful activity, to wit:

MURDAUGH caused a \$83,333.33 check which represented the legal fees due in a case to MURDAUGH's law firm, Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED), to be disbursed from the client trust account to "Forge Consulting, LLC" as "Structured Fee" rather than following the normal practice of having a trust account check for fees written to the operating account MURDAUGH's law firm, PMPED. Instead, MURDAUGH deposited the check on or about May 12, 2021 into a "Forge" account under his control that he created to facilitate the illusion that funds were being sent to the legitimate company Forge Consulting, LLC. MURDAUGH then engaged in financial transactions to convert the money to personal use, including writing checks to cash, making online transfers, and writing checks to associates. These transactions exceeded \$20,000 but were less than \$100,000 in a twelve month period.

All in violation of section 35-11-740 of the South Carolina Code of Laws, and such conduct involving a violation of the South Carolina Anti-Money Laundering Act, or a crime related to a violation of the Anti-Money Laundering Act, and such conduct also involving a crime involving computer crimes, or a conspiracy or solicitation to commit a crime involving computer crimes, and such conduct having not been authorized by law.

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

**COUNT FIVE
COMPUTER CRIME
VALUE MORE THAN \$10,000
S.C. Code Ann. §16-16-20
CDR Code: 3110**

That RICHARD ALEXANDER MURDAUGH, in Colleton County, between on or about December 16, 2020 and on or about July 16, 2021, did wilfully, knowingly, maliciously, and without authorization and for an unauthorized purpose, directly or indirectly access or cause to be accessed a computer, computer system, or computer network for the purpose of: devising or executing a scheme or artifice to defraud; obtaining money, property, or services by means of false or fraudulent pretenses, representations, promises; and committing any crime; to wit:

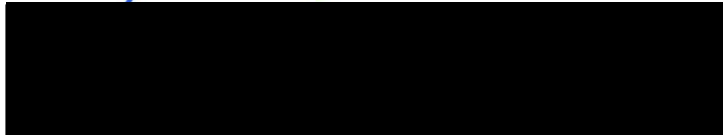
MURDAUGH caused a \$91,867.50 check and a \$83,333.33 check representing fees due to the law firm to be written in a manner so that he could deposit them in a "Forge" bank account under his control that he created to facilitate the illusion that funds were being sent to the legitimate company Forge Consulting, LLC. Instead, MURDAUGH bypassed the law firm and then made online transfers to convert part of this money to the personal use of himself and his family. These transactions exceeded \$10,000.

All in violation of section 16-16-20 of the South Carolina Code of Laws, and such conduct involving a violation of the South Carolina Anti-Money Laundering Act, or a crime related to a violation of the Anti-Money Laundering Act, and such conduct also involving a crime involving computer crimes, or a conspiracy or solicitation to commit a crime involving computer crimes, and such conduct having not 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 (scw)
ATTORNEY GENERAL