

FILED

AUG 16 2022

STATE GRAND JURY OF SOUTH CAROLINA

MARGARET J. SELE, JUDGE
CLERK, SC STATE GRAND JURY

STATE OF SOUTH CAROLINA)

Case No. 2022-GS-47-22

v.)

SPENCER ANWAN ROBERTS)

Defendant.)

**INDICTMENT FOR OBTAINING
PROPERTY BY FALSE PRETENSES,
MONEY LAUNDERING, COMPUTER
CRIME, AND FALSE STATEMENT OR
MISREPRESENTATION (INSURANCE
FRAUD)**

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)**

That SPENCER ANWAN ROBERTS did, in Colleton County, on or about February 25, 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:

ROBERTS fraudulently obtained \$20,000 in federal funds distributed under the Paycheck Protection Program by representing himself to be a qualified business and self-employed "Insurance Agency or Brokerage" firm. No such firm existed, nor had ROBERTS ever independently operated any such business. ROBERTS then converted the funds provided through the program into cash through online banking transfers and withdrawals structured in amounts of less than \$10,000 so as to conceal the source of his

funds and not cause financial institutions to report the transactions to authorities as required by law.

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 also involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired and having significance in more than one county in this state; 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**

That SPENCER ANWAN ROBERTS did, in Colleton County, from on or about February 25, 2021, through on or about March 5, 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:

ROBERTS fraudulently obtained \$20,000 in federal funds distributed under the Paycheck Protection Program by representing himself to be a qualified business and self-employed "Insurance Agency or Brokerage" firm. No such firm existed, nor had ROBERTS ever independently operated any such business. ROBERTS then converted the funds provided through the program into cash through online banking transfers and withdrawals structured in amounts of less than \$10,000 so as to conceal the source of his funds and not cause financial institutions to report the transactions to authorities as required by law.

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 also involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired and having significance in more than one county in this state; 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
COMPUTER CRIME
VALUE MORE THAN \$10,000
S.C. Code Ann. § 16-16-20**

That SPENCER ANWAN ROBERTS, in Colleton County, between from on or about February 25, 2021, through on or about March 5, 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:

ROBERTS fraudulently obtained \$20,000 in federal funds distributed under the Paycheck Protection Program by representing himself to be a qualified business and self-employed "Insurance Agency or Brokerage" firm. No such firm existed, nor had ROBERTS ever independently operated any such business. ROBERTS then converted the funds provided through the program into cash through online banking transfers in excess of \$10,000, and withdrawals structured in amounts of less than \$10,000 so as to conceal the source of his funds and not cause financial institutions to report the transactions to authorities as required by law.

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 also involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances,

and such crime being of a multi-county nature and having transpired and having significance in more than one county in this state; 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
FALSE STATEMENT OR MISREPRESENTATION (INSURANCE FRAUD)
VALUE \$10,000 OR MORE
S.C. Code Ann. § 38-55-540(A)(3)**

That SPENCER ANWAN ROBERTS did, in Colleton County, from on or about May 2020 through on or about May 2021, with an intent to injure, defraud, and deceive, knowingly make a false statement and misrepresentation, with the intent of obtaining an undeserved economic advantage and benefit, in connection with an insurance transaction; to wit:

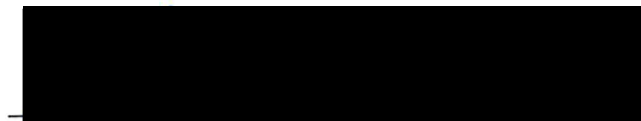
ROBERTS fraudulently obtained \$24,867 in unemployment insurance from the South Carolina Department of Employment and Workforce by representing himself to have lost employment with "Spin's Car Wash" due to the SARS-COV-2 pandemic. No such firm existed, nor had ROBERTS ever independently operated any such ongoing concern. ROBERTS received and was awarded insurance benefits enhanced by both state and federal funds available during the extraordinary circumstances of the pandemic. ROBERTS used the funds for various and sundry personal expenses, and otherwise converted it into cash.

All in violation of section 38-55-540 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 also involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired and having significance in more than one county in this state; 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

Handwritten signature of Alan Wilson in blue ink.

ALAN WILSON (scw/jejj)
ATTORNEY GENERAL