

STATE GRAND JURY OF SOUTH CAROLINA

**MARGARET J. SELF
CLERK, SC STATE GRAND JURY**

STATE OF SOUTH CAROLINA)
)
)
)
)
v.)
)
)
RICHARD ALEXANDER MURDAUGH,)
)
Defendant.)
_____)

Case No. 2021-GS-47-36 —

**INDICTMENT FOR BREACH OF TRUST
WITH FRAUDULENT INTENT AND
COMPUTER CRIME**

At a session of the State Grand Jury of South Carolina, convened in Columbia, South Carolina, on December 9, 2021, the State Grand Jurors present upon their oath and charge as follows:

**COUNT ONE
BREACH OF TRUST WITH FRAUDULENT INTENT
VALUE \$10,000 OR MORE
S.C. Code Ann. § 16-13-230
CDR Code: 3424**

That RICHARD ALEXANDER MURDAUGH, in Hampton County, on or about June 9, 2016, did willfully, unlawfully, and feloniously convert to his own use, with intention to permanently deprive the owner of possession, goods to which he had been entrusted by the owner for the care, keeping, and possession, to wit:

While relying on his prestige and reputation as a lawyer, and the trust of Johnny Bush, who had come to MURDAUGH for help, MURDAUGH advised Bush that \$100,000 of his recovery amount had been spent on accident reconstruction. Instead, MURDAUGH caused a “Johnny Bush – Structured Funds” check for \$95,000 and made out to “Forge”

to be disbursed from the PMPED Client Trust Account. Forge Consulting, LLC, is a legitimate company often used by South Carolina lawyers to facilitate structured settlements. However, MURDAUGH then deposited the \$95,000 "Structured Funds" check – which was supposed to be compensation to Bush for his injuries -- into a bank account he had created under the name "Richard A Murdaugh Sole Prop DBA Forge". MURDAUGH had created this bank account for the purpose of misappropriating funds belonging to others with the illusion that the money was being paid to the legitimate company Forge Consulting, LLC. Instead of compensating Bush, MURDAUGH instead breached Bush's trust and converted the money to his own personal use, for expenses including but not limited to a credit card payment, cash, and checks written to associates.

All in violation of section 16-13-230 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
COMPUTER CRIME
VALUE MORE THAN \$10,000
S.C. Code Ann. § 16-16-20
CDR Code: 3110**

That RICHARD ALEXANDER MURDAUGH, in Hampton County, between on or about June 9, 2016 and on or about August 7, 2016, 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:

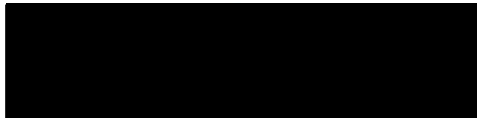
MURDAUGH created a bank account under the name "Richard A Murdaugh Sole Prop DBA Forge". He created this account for the purpose of misappropriating funds belonging to others with the illusion that the money was being paid to the legitimate settlement planning company Forge Consulting, LLC. MURDAUGH caused a \$95,000 settlement disbursement check representing proceeds intended for the benefit of Johnny Bush, to be made out to "Forge". He deposited the check into the Forge account under his control, and then conducted online banking transfers to convert settlement proceeds to his own personal use, which defrauded Bush and laundered the proceeds. 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