

STATE GRAND JURY OF SOUTH CAROLINA

STATE OF SOUTH CAROLINA,)	Case No: <u>2021-GS-47-30</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 November 18, 2021, 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 Beaufort County, on or about January 9, 2019, 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:

While relying on his prestige and reputation as a lawyer, and the trust of the family of Gloria Satterfield, who was his housekeeper of many years, MURDAUGH did convince the Satterfield family that after Gloria's death he would help Gloria's sons recover against his insurance for a fall that Gloria suffered at the Murdaugh family home at Moselle. To

that end, he convinced the Satterfield family to retain a lawyer who was a close friend of MURDAUGH. MURDAUGH ultimately had that lawyer make out a settlement disbursement check for \$403,500 to "Forge", and deliver the check to MURDAUGH. Forge Consulting, LLC, is a legitimate company often used by South Carolina lawyers to facilitate structured settlements. However, MURDAUGH then deposited the \$403,500 check -- which was supposed to be compensation to Gloria's sons for her death -- 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 false pretense that the money was being paid to the legitimate company Forge Consulting, LLC. Instead of compensating Gloria's sons for her death, MURDAUGH instead converted the money to his own personal use, for expenses including but not limited to car payments, loan payments, cash, 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 \$100,000 OR MORE
S.C. Code Ann. §35-11-740
CDR Code: 3939

That RICHARD ALEXANDER MURDAUGH, in Beaufort County, between on or about January 9, 2019 and on or about March 5, 2019, 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 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 \$403,500 settlement disbursement check representing proceeds intended for the benefit of Gloria Satterfield's sons to be made out to "Forge". He then deposited the check into the Forge account under his control, and then conducted financial transactions including online banking transfers and cash withdrawals to convert the \$403,500 to his own personal use. These transactions exceeded \$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
COMPUTER CRIME
VALUE MORE THAN \$10,000
S.C. Code Ann. §16-16-20
CDR Code: 3110**

That RICHARD ALEXANDER MURDAUGH, in Beaufort County, between on or about January 9, 2019 and on or about March 5, 2019, 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 \$403,500 settlement disbursement check representing proceeds intended for the benefit of Gloria Satterfield's sons to be made out to "Forge". He then 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 the Satterfield sons 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.

**COUNT FOUR
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 Beaufort County, on or about May 15, 2019, 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:

While relying on his prestige and reputation as a lawyer, and the trust of the family of Gloria Satterfield, who was his housekeeper of many years, MURDAUGH did convince the Satterfield family that after Gloria's death he would help Gloria's sons recover against his insurance for a fall that Gloria suffered at the Murdaugh family home at Moselle. To

that end, he convinced the Satterfield family to retain a lawyer who was a close friend of MURDAUGH. MURDAUGH ultimately had that lawyer make out a settlement disbursement check for \$2,961,931.95 to "Forge", and deliver the check to MURDAUGH. Forge Consulting, LLC, is a legitimate company often used by South Carolina lawyers to facilitate structured settlements. However, MURDAUGH then deposited the \$2,961,931.95 check – which was supposed to be compensation to Gloria's sons for her death -- 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 false pretense that the money was being paid to the legitimate company Forge Consulting, LLC. Instead of compensating Gloria's sons for her death, MURDAUGH instead converted the money to his own personal use, for expenses including but not limited to utility payments, loan payments, a six figure credit card payment, cash, and checks written to himself and associates, including six figure checks written to his father and a law partner.

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 FIVE
MONEY LAUNDERING
VALUE \$100,000 OR MORE
S.C. Code Ann. §35-11-740
CDR Code: 3939**

That RICHARD ALEXANDER MURDAUGH, in Beaufort County, between on or about May 15, 2019 and on or about February 28, 2020, 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 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 \$2,961,931.95 settlement disbursement check representing proceeds intended for the benefit of Gloria Satterfield's sons to be made out to "Forge". He then deposited the check into the Forge account under his control, and then conducted financial transactions including online banking transfers and cash withdrawals to convert the \$2,961,931.95 to his own personal use. These transactions exceeded \$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 SIX
COMPUTER CRIME
VALUE MORE THAN \$10,000
S.C. Code Ann. §16-16-20
CDR Code: 3110**

That RICHARD ALEXANDER MURDAUGH, in Beaufort County, between on or about May 15, 2019 and on or about February 28, 2020, 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 \$2,961,931.95 settlement disbursement check representing proceeds intended for the benefit of Gloria Satterfield's sons to be made out to "Forge". He then 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 the Satterfield sons 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.

COUNT SEVEN
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 Beaufort County, on or about October 6, 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:

While relying on his prestige and reputation as a lawyer, and the trust of the family of Gloria Satterfield, who was his housekeeper of many years, MURDAUGH did convince the Satterfield family that after Gloria's death he would help Gloria's sons recover against his insurance for a fall that Gloria suffered at the Murdaugh family home at Moselle. To that end, he convinced the Satterfield family to retain a lawyer who was a close friend of

MURDAUGH. MURDAUGH ultimately had that lawyer make out a settlement disbursement check for \$118,000 to “Forge”, and deliver the check to MURDAUGH. Forge Consulting, LLC, is a legitimate company often used by South Carolina lawyers to facilitate structured settlements. However, MURDAUGH then deposited the \$118,000 check – which was supposed to be compensation to Gloria’s sons for her death -- 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 false pretense that the money was being paid to the legitimate company Forge Consulting, LLC. Instead of compensating Gloria’s sons for her death, MURDAUGH instead converted the money to his own personal use, for expenses including but not limited to overdraft fees, cash, and checks written to family and 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 EIGHT
MONEY LAUNDERING
VALUE \$100,000 OR MORE
S.C. Code Ann. §35-11-740
CDR Code: 3939**

That RICHARD ALEXANDER MURDAUGH, in Beaufort County, between on or about October 6, 2020 and on or about November 13, 2020, 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 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 \$118,000 settlement disbursement check representing proceeds intended for the benefit of Gloria Satterfield's sons to be made out to "Forge". He then deposited the check into the Forge account under his control, and then conducted financial transactions including online banking transfers and cash withdrawals to convert the \$118,000 to his own personal use. These transactions exceeded \$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 NINE
COMPUTER CRIME
VALUE MORE THAN \$10,000
S.C. Code Ann. §16-16-20
CDR Code: 3110**

That RICHARD ALEXANDER MURDAUGH, in Beaufort County, between on or about October 6, 2020 and on or about November 13, 2020, 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 \$118,000 settlement disbursement check representing proceeds intended for the benefit of Gloria Satterfield's sons to be made out to "Forge". He then 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 the Satterfield sons 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 0

Alan Wilson
ALAN WILSON (scw)
ATTORNEY GENERAL