

STATE OF SOUTH CAROLINA)

INDICTMENT

COUNTY OF RICHLAND)

At a Court of General Sessions, convened on September 10, 2014, the Grand Jurors of Richland County present upon their oath:

COMMON LAW MISCONDUCT IN OFFICE

That on or about January 1, 2009 through on or about January 10, 2013 in Richland County, and while an elected member of the South Carolina House of Representatives, the Defendant, ROBERT W. HARRELL, JR., willfully and dishonestly failed to properly and faithfully discharge the duties of his public office imposed upon him by law; to wit, by using the office and position of House Member and by using his campaign funds to obtain personal profit and benefit to himself, the Defendant did commit acts or omissions in breach of his duty of good faith and accountability to the public.

All against the peace and dignity of the State and in violation of the common law of South Carolina.



DAVID M. PASCOE
FIRST CIRCUIT SOLICITOR

WITNESSES

Lt. Kevin Baker, SLED

Docket No. 2014-GS-40-06399

The State of South Carolina

County of Richland

I, _____ hereby appear in my own proper person and plead guilty to the within indictment or to _____

ARREST WARRANT NUMBER

DP14228

COURT OF GENERAL SESSIONS

September 2014 Term

Defendant _____

ACTION OF GRAND JURY

TRUE BILL

**ROBERT W. HARRELL, JR.,
DEFENDANT**

I, _____ after being informed of my right to presentment of this indictment to the grand jury, hereby waive such presentment.

Defendant _____

Foreperson of Grand Jury

Date: **SEP 10 2014**

Indictment for

MISCONDUCT IN OFFICE

Witness: _____

VERDICT

COMMON LAW

CDR Code: 0819

C.C. PIs. And G.S. _____

Foreperson of Petit Jury

Date: _____

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

INDICTMENT

At a Court of General Sessions, convened on September 10, 2014, the Grand Jurors of Richland County present upon their oath:

MISCONDUCT IN OFFICE

That on or about January 1, 2009 through on or about January 10, 2013, in Richland County, the Defendant, ROBERT W. HARRELL, JR., a public officer, knowingly committed acts and omissions constituting official misconduct, fraud, corruption or habitual negligence; to wit, the Defendant while an elected member of the House of Representatives and Candidate for State Office did misrepresent the purpose of travel and other expenditures in order to obtain personal profit and benefit.

All against the peace and dignity of this State and in violation of Section §8-1-80, Code of Laws of South Carolina (1976), as amended.



DAVID M. PASCOE
FIRST CIRCUIT SOLICITOR

WITNESSES

Lt. Kevin Baker, SLED

Docket No. 2014-GS-40-06401

The State of South Carolina

County of Richland

COURT OF GENERAL SESSIONS

September 2014 Term

ARREST WARRANT NUMBER

DP14229

ACTION OF GRAND JURY

TRUE BILL

Foreperson of Grand Jury SEP 10 2014
Date:

VERDICT

Foreperson of Petit Jury
Date:

ROBERT W. HARRELL, JR.,
DEFENDANT

THE STATE

vs.

Indictment for

MISCONDUCT IN OFFICE

SC Code: § 8-1-80
CDR Code: 115

I, _____
hereby appear in my own proper person
and plead guilty to the within indictment or
to

Defendant

I, _____
after being informed of my right to
presentment of this indictment to the
grand jury, hereby waive such
presentment.

Defendant

Witness:

C.C. PIs. And G.S.

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

INDICTMENT

At a Court of General Sessions, convened on September 10, 2014, the Grand Jurors of Richland County present upon their oath:

ETHICS ACT VIOLATION
FALSE REPORTING

On or about the period between January 1, 2009 and January 10, 2013, Defendant ROBERT W. HARRELL, JR., was responsible for filing and did knowingly file, in Richland County, Candidate Campaign Disclosures detailing reimbursements and expenditures from his campaign account, which included false claims that money was spent for a legitimate campaign or legislative purpose, when it actually was spent for personal use, to wit:

The Defendant spent approximately \$1,005,305.65 from his campaign account during 2009 through 2012. Of this total, the Defendant paid himself from his campaign funds totaling approximately \$294,335.22 in untaxed income and claimed that the payments were for legislative or campaign expenses. These payments included approximately \$93,958.50 converted to the Defendant's personal use for expenses of Defendant's privately owned airplane. The payments included approximately \$96,381.46 for legislative travel despite the fact that some of the travel expenditures were personal in nature. Furthermore, the Defendant obtained these travel "reimbursements" despite the fact he also received payment for the some of these travel expenses from other sources. The unlawful payments also included approximately \$70,286.46 for salary paid to his Administrative Assistant for his privately owned State Farm Insurance business. In addition, the Defendant used his campaign account to pay credit card debt and to pay for goods or services for his home, family and friends that were not for any purposes related to his campaign for or position in the South Carolina House of Representatives.

The Defendant concealed this pattern of unlawful payments by falsely claiming that they were for campaign and official House of Representatives related purposes, when in fact the expenditures were for personal use. The Defendant further concealed this unlawful payment scheme by various activities, including but not limited to: (1) changing and altering the entries in his pilot logbook, (2) creating schedules of flights in order to justify payments from his campaign account, when in fact some of the listed flights did not occur or were personal and not related to any official or campaign purpose, (3) misinforming law enforcement officers about the purposes and circumstances surrounding expenditures, and (4) misinforming the House Ethics Committee about the reason he reimbursed his campaign account.

All in violation of §8-13-1308 and §8-13-1520 of the S. C. Code of Laws, as amended, and against the peace and dignity of the State and contrary to the law.



DAVID M. PASCOE
FIRST CIRCUIT SOLICITOR

WITNESSES

Lt. Kevin Baker, SLED

Docket No. 2014-GS-40-06408

The State of South Carolina

County of Richland

I, _____ hereby appear in my own proper person and plead guilty to the within indictment or to _____

ARREST WARRANT NUMBER

DP14236

COURT OF GENERAL SESSIONS

September 2014 Term

Defendant _____

ACTION OF GRAND JURY

TRUE BILL

**ROBERT W. HARRELL, JR.,
DEFENDANT**

I, _____ after being informed of my right to presentment of this indictment to the grand jury, hereby waive such presentment.

Defendant _____

Foreperson of Grand Jury _____

Date: **SEP 10 2014**

VERDICT

**ETHICS ACT VIOLATION
FALSE REPORTING**

Witness: _____

S.C. Code Ann. § 8-13-1308 & -1520

CDR Code: 2985

C.C. PIs. And G.S. _____

Foreperson of Petit Jury _____

Date: _____

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

INDICTMENT _____

At a Court of General Sessions, convened on September 10, 2014, the Grand Jurors of Richland County present upon their oath:

ETHICS ACT VIOLATION
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSES

On or about June 3, 2009 through on or about July 6, 2009, the Defendant, ROBERT W. HARRELL, JR, in Richland County, knowingly did use campaign funds to defray personal expenses which were neither related to his campaign nor his office in the House of Representatives of the State of South Carolina, and knowingly did convert campaign funds to personal use, to wit:

The Defendant did pay himself from his campaign account for expenditures he claimed were for legislative travel involving the use of his private airplane, when in fact a portion of the money Defendant paid himself was for a non-existent round trip flight from Charleston to Columbia alleged to have been on March 13, 2009. In his Certified Campaign Disclosure Form, filed in Richland County on or about July 6, 2009 with the Ethics Committee of the South Carolina House of Representatives, Defendant alleged this expenditure was for "Legislative travel".

All in violation of §8-13-1348(A) and §8-13-1520 of the S.C. Code of Laws, as amended, and against the peace and dignity of the State and contrary to the law.



DAVID M. PASCOE
FIRST CIRCUIT SOLICITOR

WITNESSES

Lt. Kevin Baker, SLED

ARREST WARRANT NUMBER

DP14232

Docket No. 2014-GS-40-06404

The State of South Carolina

County of Richland

COURT OF GENERAL SESSIONS

September 2014 Term

I, _____
hereby appear in my own proper person
and plead guilty to the within indictment or
to _____

Defendant

ACTION OF GRAND JURY

TRUE BILL

Foreperson of Grand Jury

Date: SEP 10 2014

VERDICT

**ROBERT W. HARRELL, JR.,
DEFENDANT**

I, _____
after being informed of my right to
presentment of this indictment to the
grand jury, hereby waive such
presentment.

Defendant

Indictment for

**ETHICS ACT VIOLATION
USE OF CAMPAIGN FUNDS FOR
PERSONAL EXPENSES**

Witness:

C.C. Pls. And G.S.

S.C. Code Ann. § 8-13-1348(A) & -1520

CDR Code: 2985

Foreperson of Petit Jury

Date:

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

INDICTMENT _____

At a Court of General Sessions, convened on September 10, 2014, the Grand Jurors of Richland County present upon their oath:

ETHICS ACT VIOLATION
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSES

On or about June 3, 2009 through on or about July 6, 2009, the Defendant, ROBERT W. HARRELL, JR, in Richland County, knowingly did use campaign funds to defray personal expenses which were neither related to his campaign nor his office in the House of Representatives of the State of South Carolina, and knowingly did convert campaign funds to personal use, to wit:

The Defendant did pay himself from his campaign account for expenditures he claimed were for legislative travel involving the use of his private airplane, when in fact a portion of the money Defendant paid himself was for a non-existent round trip flight from Charleston to Columbia alleged to have been on May 4, 2009. In his Certified Campaign Disclosure Form, filed in Richland County on or about July 6, 2009 with the Ethics Committee of the South Carolina House of Representatives, Defendant alleged this expenditure was for "Legislative travel".

All in violation of §8-13-1348(A) and §8-13-1520 of the S.C. Code of Laws, as amended, and against the peace and dignity of the State and contrary to the law.



DAVID M. PASCOE
FIRST CIRCUIT SOLICITOR

WITNESSES

Lt. Kevin Baker, SLED

ARREST WARRANT NUMBER

DP14234

ACTION OF GRAND JURY

TRUE BILL

Robert W. Harrell, Jr.

Foreperson of Grand Jury
Date: SEP 10 2014

VERDICT

Foreperson of Petit Jury
Date:

Docket No. 2014-GS-40-06406

The State of South Carolina

County of Richland

COURT OF GENERAL SESSIONS

September 2014 Term

THE STATE

vs.

ROBERT W. HARRELL, JR.,
DEFENDANT

Indictment for

ETHICS ACT VIOLATION
USE OF CAMPAIGN FUNDS FOR
PERSONAL EXPENSES

S.C. Code Ann. § 8-13-1348(A) & -1520
CDR Code: 2985

C.C. Pis. And G.S.

I, _____
hereby appear in my own proper person
and plead guilty to the within indictment or
to

Defendant

I, _____
after being informed of my right to
presentment of this indictment to the
grand jury, hereby waive such
presentment.

Defendant

Witness:

C.C. Pis. And G.S.

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

INDICTMENT

At a Court of General Sessions, convened on September 10, 2014, the Grand Jurors of Richland County present upon their oath:

ETHICS ACT VIOLATION
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSES

On or about November 24, 2009 through on or about January 6, 2010, the Defendant, ROBERT W. HARRELL, JR, in Richland County, knowingly did use campaign funds to defray personal expenses which were neither related to his campaign nor his office in the House of Representatives of the State of South Carolina, and knowingly did convert campaign funds to personal use, to wit:

The Defendant did pay himself from his campaign account for expenses he claimed were for legislative travel involving the use of his private airplane, when in fact a portion of the money Defendant paid himself was for a non-existent round trip flight from Charleston to Columbia alleged to have been on September 9, 2009. In his Certified Campaign Disclosure Form, filed in Richland County on or about January 6, 2010 with the Ethics Committee of the South Carolina House of Representatives, Defendant alleged this expenditure was for "Reimbursement for travel".

All in violation of §8-13-1348(A) and §8-13-1520 of the S.C. Code of Laws, as amended, and against the peace and dignity of the State and contrary to the law.



DAVID M. PASCOE
FIRST CIRCUIT SOLICITOR

WITNESSES

Lt. Kevin Baker, SLED

ARREST WARRANT NUMBER

DP14235

Docket No. 2014-GS-40-06407

The State of South Carolina

County of Richland

COURT OF GENERAL SESSIONS

September 2014 Term

THE STATE

vs.

**ROBERT W. HARRELL, JR.,
DEFENDANT**

I, _____
hereby appear in my own proper person
and plead guilty to the within indictment or
to _____

Defendant

I, _____
after being informed of my right to
presentation of this indictment to the
grand jury, hereby waive such
presentation.

Defendant

Witness:

C.C. Pls. And G.S.

ACTION OF GRAND JURY

TRUE BILL



Foreperson of Grand Jury

Date: SEP 10 2014

VERDICT

**ETHICS ACT VIOLATION
USE OF CAMPAIGN FUNDS FOR
PERSONAL EXPENSES**

S.C. Code Ann. § 8-13-1348(A) & -1520
CDR Code: 2985

Foreperson of Petit Jury

Date:

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

INDICTMENT

At a Court of General Sessions, convened on September 10, 2014, the Grand Jurors of Richland County present upon their oath:

ETHICS ACT VIOLATION
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSES

That on or about February 10, 2012 through on or about October 24, 2012, the Defendant, ROBERT W. HARRELL, JR., in Richland County, knowingly did use campaign funds to defray personal expenses which were neither related to his campaign nor his office in the House of Representatives of the State of South Carolina, and knowingly did convert campaign funds to personal use, to wit:

The Defendant unlawfully paid himself approximately \$70,286.46 from his campaign account. In his Certified Campaign Disclosure forms filed in Richland County with the Ethics Committee of the South Carolina House of Representatives on or about April 10, 2012, July 9, 2012 and October 22, 2012, Defendant claimed these expenditures were for an administrative assistant when in fact the Defendant gained an unlawful personal benefit.

This in violation of §8-13-1348(A) and §8-13-1520 of the S. C. Code of Laws, as amended, and against the peace and dignity of the State and contrary to the law.



DAVID M. PASCOE
FIRST CIRCUIT SOLICITOR

WITNESSES

Lt. Kevin Baker, SLED

ARREST WARRANT NUMBER

DP14230

Docket No. 2014-GS-40-06402

The State of South Carolina

County of Richland

COURT OF GENERAL SESSIONS

September 2014 Term

I, _____
hereby appear in my own proper person
and plead guilty to the within indictment or
to _____

Defendant

ACTION OF GRAND JURY

TRUE BILL

[Handwritten Signature]

Foreperson of Grand Jury
Date: **SEP 10 2014**

VERDICT

**ROBERT W. HARRELL, JR.,
DEFENDANT**

THE STATE

vs.

Indictment for

**ETHICS ACT VIOLATION
USE OF CAMPAIGN FUNDS FOR
PERSONAL EXPENSES**

I, _____
after being informed of my right to
presentation of this indictment to the
grand jury, hereby waive such
presentation.

Defendant

Witness:

C.C. Pls. And G.S.

S.C. Code Ann. § 8-13-1348(A) & -1520
CDR Code: 2985

Foreperson of Petit Jury

Date:

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

INDICTMENT _____

At a Court of General Sessions, convened on September 10, 2014, the Grand Jurors of Richland County present upon their oath:

ETHICS ACT VIOLATION
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSES

On or about June 3, 2009 through on or about July 6, 2009, the Defendant, ROBERT W. HARRELL, JR, in Richland County, knowingly did use campaign funds to defray personal expenses which were neither related to his campaign nor his office in the House of Representatives of the State of South Carolina, and knowingly did convert campaign funds to personal use, to wit:

The Defendant did pay himself from his campaign account for expenditures he claimed were for legislative travel involving the use of his private airplane, when in fact a portion of the money Defendant paid himself was for a non-existent round trip flight from Charleston to Columbia alleged to have been on January 8, 2009. In his Certified Campaign Disclosure Form, filed in Richland County on or about July 6, 2009 with the Ethics Committee of the South Carolina House of Representatives, Defendant alleged this expenditure was for "Legislative travel".

All in violation of §8-13-1348(A) and §8-13-1520 of the S.C. Code of Laws, as amended, and against the peace and dignity of the State and contrary to the law.



DAVID M. PASCOE
FIRST CIRCUIT SOLICITOR

WITNESSES

Lt. Kevin Baker, SLED

ARREST WARRANT NUMBER

DP14231

ACTION OF GRAND JURY

TRUE BILL

Foreperson of Grand Jury

SEP 10 2014

VERDICT

Foreperson of Petit Jury

Date:

Docket No. 2014-GS-40-06403

The State of South Carolina

County of Richland

COURT OF GENERAL SESSIONS

September 2014 Term

THE STATE

vs.

**ROBERT W. HARRELL, JR.,
DEFENDANT**

Indictment for

**ETHICS ACT VIOLATION
USE OF CAMPAIGN FUNDS FOR
PERSONAL EXPENSES**

S.C. Code Ann. § 8-13-1348(A) & -1520
CDR Code: 2985

I, _____
hereby appear in my own proper person
and plead guilty to the within indictment or
to

Defendant

I, _____
after being informed of my right to
presentation of this indictment to the
grand jury, hereby waive such
presentation.

Defendant

Witness:

C.C. PIs. And G.S.

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

INDICTMENT _____

At a Court of General Sessions, convened on September 10, 2014, the Grand Jurors of Richland County present upon their oath:

ETHICS ACT VIOLATION
USE OF CAMPAIGN FUNDS FOR PERSONAL EXPENSES

On or about June 3, 2009 through on or about July 6, 2009, the Defendant, ROBERT W. HARRELL, JR., in Richland County, knowingly did use campaign funds to defray personal expenses which were neither related to his campaign nor his office in the House of Representatives of the State of South Carolina, and knowingly did convert campaign funds to personal use, to wit:

In March 2009, the Defendant did travel in his private airplane on a personal trip, transporting himself, family and friends to Florida for a high school baseball tournament. Subsequently, on or about June 3, 2009, the Defendant did pay himself from his campaign account for expenses incurred during this personal trip approximately \$3,874.50 for the use of his own private airplane. In his Certified Campaign Disclosure Form filed in Richland County with the Ethics Committee of the South Carolina House of Representatives on or about July 6, 2009, the Defendant claimed the expenditure was for "Legislative travel", when in fact it included this expenditure that was personal in nature.

All in violation of §8-13-1348(A) and §8-13-1520 of the S. C. Code of Laws, as amended, and against the peace and dignity of the State and contrary to the law.



DAVID M. PASCOE
FIRST CIRCUIT SOLICITOR

WITNESSES

Lt. Kevin Baker, SLED

Docket No. 2014-GS-40-06405

The State of South Carolina

County of Richland

COURT OF GENERAL SESSIONS

September 2014 Term

ARREST WARRANT NUMBER

DP14233

ACTION OF GRAND JURY

TRUE BILL

Foreperson of Grand Jury SEP 10 2014

VERDICT

**ROBERT W. HARRELL, JR.,
DEFENDANT**

THE STATE

vs.

Indictment for

**ETHICS ACT VIOLATION
USE OF CAMPAIGN FUNDS FOR
PERSONAL EXPENSES**

S.C. Code Ann. § 8-13-1348(A) & -1520
CDR Code: 2985

I, _____
hereby appear in my own proper person
and plead guilty to the within indictment or
to _____

Defendant

I, _____
after being informed of my right to
presentment of this indictment to the
grand jury, hereby waive such
presentment.

Defendant

Witness:

C.C. PIs. And G.S.

Foreperson of Petit Jury
Date: