

amount of \$388,687.50, to be made out to Palmetto State Bank and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED) Client Trust Account. LAFFITTE was an executive of Palmetto State Bank and longtime friend of MURDAUGH, and MURDAUGH had secured LAFFITTE an appointment as the personal representative of Donna's estate for which LAFFITTE received a sizeable fee from the settlement. In his role as a bank executive, LAFFITTE used the \$388,687.50 trust account check – which was supposed to be compensation to Badger – to purchase a money order for MURDAUGH so MURDAUGH could repay a loan from a law partner. Instead of applying the compensation for the Badger case, MURDAUGH breached his client's trust, and MURDAUGH and LAFFITTE converted the money to MURDAUGH's personal use and to pay personal debts.

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
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, and RUSSELL LUCIUS LAFFITTE

as an aider and abettor, in Allendale County, on or about February 11, 2013, 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 Arthur Badger, who had come to MURDAUGH for help after a vehicular collision that killed his wife Donna, MURDAUGH caused a check with the description "Arthur Badger", in the amount of \$75,000.00, to be made out to Palmetto State Bank and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED) Client Trust Account. LAFFITTE was an executive of Palmetto State Bank and longtime friend of MURDAUGH, and MURDAUGH had secured LAFFITTE an appointment as the personal representative of Donna's estate for which LAFFITTE received a sizeable fee from the settlement. In his role as a bank executive, LAFFITTE used the \$75,000.00 trust account check – which was supposed to be compensation to Badger – to purchase a money order for MURDAUGH payable to one of MURDAUGH's family members. Instead of applying the compensation for the Badger case, MURDAUGH breached his client's trust, and MURDAUGH and LAFFITTE converted the money to MURDAUGH's personal use and to pay personal debts.

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 THREE
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, and RUSSELL LUCIUS LAFFITTE as an aider and abettor, in Allendale County, on or about February 12, 2013, 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 Arthur Badger, who had come to MURDAUGH for help after a vehicular collision killed his wife Donna, RICHARD ALEXANDER MURDAUGH caused a check with the description "Arthur Badger", in the amount of \$151,726.05, to be made out to Palmetto State Bank and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED) Client Trust Account. LAFFITTE was an executive of Palmetto State Bank and longtime friend of MURDAUGH, and MURDAUGH had secured LAFFITTE an appointment as the personal representative of Donna's estate for which LAFFITTE received a sizeable fee from the settlement. In his role as a bank executive, LAFFITTE deposited for MURDAUGH the \$151,726.05 trust account check – which was supposed to be compensation to Badger – into an account for a different person for which LAFFITTE had been appointed conservator. LAFFITTE as conservator for that different person had

previously allowed MURDAUGH to borrow money from funds in that account, and the money misappropriated from the Badger case was used to pay on that debt. Instead of applying the compensation for the Badger case, MURDAUGH breached his client's trust, and MURDAUGH and LAFFITTE converted the money to MURDAUGH's personal use and to pay personal debts.

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 FOUR
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, and RUSSELL LUCIUS LAFFITTE as an aider and abettor, in Allendale County, on or about September 13, 2013, 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 Arthur Badger, who had come to MURDAUGH for help after a vehicular collision killed his wife

Donna, MURDAUGH caused a check with the description "Estate of Donna Badger", in the amount of \$33,789.83, to be made out to Palmetto State Bank and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED) Client Trust Account. LAFFITTE was an executive of Palmetto State Bank and longtime friend of MURDAUGH, and MURDAUGH had secured LAFFITTE an appointment as the personal representative of Donna's estate for which LAFFITTE received a sizeable fee from the settlement. In his role as a bank executive, LAFFITTE deposited for MURDAUGH the \$33,789.83 trust account check – which was supposed to be compensation for the wreck – into an account for a different person for which LAFFITTE had been appointed conservator. LAFFITTE as conservator for that different person had previously allowed MURDAUGH to borrow money from funds in that account, and the money misappropriated from the Badger case was used to pay on that debt. Instead of applying the compensation for the Badger case, MURDAUGH breached his client's trust, and MURDAUGH and LAFFITTE converted the money to MURDAUGH's personal use and to pay personal debts.

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 FIVE
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, and RUSSELL LUCIUS LAFFITTE as an aider and abettor, in Allendale County, on or about October 3, 2013, 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 Arthur Badger, who had come to MURDAUGH for help after a vehicular collision killed his wife Donna, MURDAUGH caused a check with the description "Estate of Donna Badger", in the amount of \$101,369.49, to be made out to Palmetto State Bank and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED) Client Trust Account. LAFFITTE was an executive of Palmetto State Bank and longtime friend of MURDAUGH, and MURDAUGH had secured LAFFITTE an appointment as the personal representative of Donna's estate for which LAFFITTE received a sizeable fee from the settlement. In his role as a bank executive, LAFFITTE used the \$101,369.49 trust account check – which was supposed to be compensation for the Badger wreck – to purchase for MURDAUGH money orders payable to the conservatorship of another person and a family member. LAFFITTE as conservator for that different person had previously allowed MURDAUGH to borrow money from funds in that account, and the money misappropriated from the Badger case was in part used to pay on that debt. Instead of applying the compensation for the Badger case, MURDAUGH breached his

client's trust, and MURDAUGH and LAFFITTE converted the money to MURDAUGH's personal use and to pay personal debts.

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 SIX
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, and RUSSELL LUCIUS LAFFITTE as an aider and abettor, in Allendale County, on or about October 28, 2013, 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 Arthur Badger, who had come to MURDAUGH for help after a vehicular collision injured him and killed his wife Donna, MURDAUGH caused a check with the description "Estate of Donna Badger", in the amount of \$101,369.49, to be made out to Palmetto State Bank and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A.

(PMPED) Client Trust Account. LAFFITTE was an executive of Palmetto State Bank and longtime friend of MURDAUGH, and MURDAUGH had secured LAFFITTE an appointment as the personal representative of Donna's estate for which LAFFITTE received a sizeable fee from the settlement. In his role as a bank executive, LAFFITTE deposited for MURDAUGH the \$101,369.49 trust account check – which was supposed to be compensation for the Badger wreck – into the conservator's account for a different person. LAFFITTE as conservator for that different person had previously allowed MURDAUGH to borrow money from funds in that account, and the money misappropriated from the Badger case was used to pay on that debt. Instead of applying the compensation for the Badger case, MURDAUGH breached his client's trust, and MURDAUGH and LAFFITTE converted the money to MURDAUGH's personal use and to pay personal debts.

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 SEVEN
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, and RUSSELL LUCIUS LAFFITTE as an aider and abettor, in Allendale County, on or about October 29, 2013, 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 Arthur Badger, who had come to MURDAUGH for help after a vehicular collision killed his wife Donna, MURDAUGH caused a check with the description "Estate of Donna Badger", in the amount of \$50,684.75, to be made out to Palmetto State Bank and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED) Client Trust Account. LAFFITTE was an executive of Palmetto State Bank and longtime friend of MURDAUGH, and MURDAUGH had secured LAFFITTE an appointment as the personal representative of Donna's estate for which LAFFITTE received a sizeable fee from the settlement. In his role as a bank executive, LAFFITTE used the \$50,684.75 trust account check – which was supposed to be compensation for the Badger wreck – to fund a wire to a company for MURDAUGH and otherwise obtain cash for MURDAUGH. Instead of applying the compensation for the Badger case, MURDAUGH breached his client's trust, and MURDAUGH and LAFFITTE converted the money to MURDAUGH's personal use and to pay personal debts.

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 EIGHT
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, and RUSSELL LUCIUS LAFFITTE as an aider and abettor, in Allendale County, on or about December 9, 2013, 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 Arthur Badger, who had come to MURDAUGH for help after a vehicular collision killed his wife Donna, MURDAUGH caused a check with the description "Estate of Donna Badger", in the amount of \$33,789.83, to be made out to Palmetto State Bank and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED) Client Trust Account. LAFFITTE was an executive of Palmetto State Bank and longtime friend of MURDAUGH, and MURDAUGH had secured LAFFITTE an appointment as the personal representative of Donna's estate for which LAFFITTE received a sizeable fee

from the settlement. In his role as a bank executive, LAFFITTE used the \$33,789.83 trust account check – which was supposed to be compensation for the Badger wreck – to purchase for MURDAUGH a money order payable to an auto dealer, and to otherwise obtain cash for MURDAUGH. Instead of applying the compensation for the Badger case, MURDAUGH breached his client's trust, and MURDAUGH and LAFFITTE converted the money to MURDAUGH's personal use and to pay personal debts.

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 NINE
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, and RUSSELL LUCIUS LAFFITTE as an aider and abettor, in Allendale County, on or about December 18, 2013, 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 Arthur

Badger, who had come to MURDAUGH for help after a vehicular collision killed his wife Donna, MURDAUGH caused a check with the description "Estate of Donna Badger", in the amount of \$101,369.49, to be made out to Palmetto State Bank and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED) Client Trust Account. LAFFITTE was an executive of Palmetto State Bank and longtime friend of MURDAUGH, and MURDAUGH had secured LAFFITTE an appointment as the personal representative of Donna's estate for which LAFFITTE received a sizeable fee from the settlement. In his role as a bank executive, LAFFITTE deposited for MURDAUGH the \$101,369.49 trust account check – which was supposed to be compensation for the Badger wreck – into the conservator's account for a different person. LAFFITTE as conservator for that different person had previously allowed MURDAUGH to borrow money from funds in that account, and the money misappropriated from the Badger case was used to pay on that debt. Instead of applying the compensation for the Badger case, MURDAUGH breached his client's trust, and MURDAUGH and LAFFITTE converted the money to MURDAUGH's personal use and to pay personal debts.

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 TEN
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, and RUSSELL LUCIUS LAFFITTE as an aider and abettor, in Allendale County, on or about December 19, 2013, 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 Arthur Badger, who had come to MURDAUGH for help after a vehicular collision killed his wife Donna, MURDAUGH caused a check with the description "Estate of Donna Badger", in the amount of \$50,684.75, to be made out to Palmetto State Bank and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED) Client Trust Account. LAFFITTE was an executive of Palmetto State Bank and longtime friend of MURDAUGH, and MURDAUGH had secured LAFFITTE an appointment as the personal representative of Donna's estate for which LAFFITTE received a sizeable fee from the settlement. In his role as a bank executive, LAFFITTE used the \$50,684.75 trust account check – which was supposed to be compensation for the Badger wreck – to fund for MURDAUGH a wire and purchase money orders for personal use, and to otherwise obtain cash. Instead of applying the compensation for the Badger case, MURDAUGH breached his client's trust, and MURDAUGH and LAFFITTE converted the money to MURDAUGH's personal use and to pay personal debts.

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 ELEVEN
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, and RUSSELL LUCIUS LAFFITTE as an aider and abettor, in Allendale County, on or about January 21, 2014, 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 Arthur Badger, who had come to MURDAUGH for help after a vehicular collision killed his wife Donna, MURDAUGH caused a check with the description "Estate of Donna Badger", in the amount of \$50,684.75, to be made out to Palmetto State Bank and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED) Client Trust Account. LAFFITTE was an executive of Palmetto State Bank and longtime friend of MURDAUGH, and MURDAUGH had secured LAFFITTE an appointment as the

personal representative of Donna's estate for which LAFFITTE received a sizeable fee from the settlement. In his role as a bank executive, LAFFITTE intentionally enabled MURDAUGH to conduct transactions to further MURDAUGH's schemes that should have never been conducted. MURDAUGH was able to deposit the \$50,684.75 trust account check – which was supposed to be compensation for the Badger wreck – into MURDAUGH'S personal account at Palmetto State Bank. Instead of applying the compensation for the Badger case, MURDAUGH breached his client's trust, and MURDAUGH and LAFFITTE converted the money to MURDAUGH's personal use and to pay personal debts.

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 TWELVE
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, and RUSSELL LUCIUS LAFFITTE as an aider and abettor, in Allendale County, on or about January 21, 2014, 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 Arthur Badger, who had come to MURDAUGH for help after a vehicular collision killed his wife Donna, MURDAUGH caused a check with the description "Estate of Donna Badger", in the amount of \$33,789.83, to be made out to Palmetto State Bank and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED) Client Trust Account. LAFFITTE was an executive of Palmetto State Bank and longtime friend of MURDAUGH, and MURDAUGH had secured LAFFITTE an appointment as the personal representative of Donna's estate for which LAFFITTE received a sizeable fee from the settlement. In his role as a bank executive, LAFFITTE intentionally enabled MURDAUGH to conduct transactions to further MURDAUGH's schemes that should have never been conducted. MURDAUGH was able to deposit the \$33,789.83 trust account check – which was supposed to be compensation for the Badger wreck – into MURDAUGH'S personal account at Palmetto State Bank. Instead of applying the compensation for the Badger case, MURDAUGH breached his client's trust, and MURDAUGH and LAFFITTE converted the money to MURDAUGH's personal use and to pay personal debts.

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 THIRTEEN
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 Allendale County, on or about May 14, 2014, 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 Arthur Badger, who had come to MURDAUGH for help after a vehicular collision killed his wife Donna, MURDAUGH caused a check with the description "Settlement proceeds", in the amount of \$50,684.75, to be made out to "Bank of America" and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED) Client Trust Account. MURDAUGH was able to use the \$50,684.75 trust account check – which was supposed to be compensation for the Badger wreck – to pay debts he incurred upon a Bank of America credit card. Instead of applying the compensation for the Badger case, MURDAUGH breached his client's trust and converted the money to his personal use and to pay personal debts.

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 FOURTEEN
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 Allendale County, on or about June 25, 2014, 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 Arthur Badger, who had come to MURDAUGH for help after a vehicular collision killed his wife Donna, MURDAUGH caused a check with the description "Settlement proceeds", in the amount of \$101,369.49, to be made out to "Bank of America" and disbursed from client funds in the Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (PMPED) Client Trust Account. MURDAUGH then used the \$101,369.49 trust account check – which was supposed to be compensation for the Badger wreck – to pay debts he incurred upon a Bank of America credit card. Instead of applying the compensation to the Badger case, MURDAUGH breached his client's trust and converted the money to his personal use and to pay personal debts.

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

That RICHARD ALEXANDER MURDAUGH, and RUSSELL LUCIUS LAFFITTE, in Allendale County, between on or about February 11, 2013, and on or about May 14, 2014, 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:

To further his scheme to misappropriate a cumulative total of \$1.325 million of settlement proceeds that belonged to Arthur Badger, MURDAUGH requested transactions and thus caused the bank to access its systems in order to create money orders and perform internal loan transactions. He additionally caused computer systems to be accessed to perform wire transfers, account transfers, credit card payments, and other transactions to further his scheme of converting this settlement money to personal

use. LAFFITTE was a Vice President of Palmetto State Bank and the personal representative for the Estate of Donna Badger. LAFFITTE did assist MURDAUGH in causing these systems to be accessed to surreptitiously misappropriate for MURDAUGH client trust funds that LAFFITTE should have protected. 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 SIXTEEN
CRIMINAL CONSPIRACY
S.C. Code Ann. § 16-17-410
CDR CODE: 0049**

That RICHARD ALEXANDER MURDAUGH and RUSSELL LUCIUS LAFFITTE, in Allendale County, from on or about February 11, 2013, to on or about May 14, 2014, did willfully, unlawfully, and feloniously unite, combine, conspire, confederate, agree and have a tacit understanding and agreement between two or more persons, for the purpose of accomplishing an unlawful object or lawful object by unlawful means, including violations of S.C. Code Ann. § 16-13-230, and S.C. Code Ann. § 16-16-20, to wit:

While relying on his prestige and reputation as a lawyer, and the trust of Arthur Badger, who had come to MURDAUGH for help after a vehicular collision killed his wife

Donna, RICHARD ALEXANDER MURDAUGH caused RUSSELL LUCIUS LAFFITTE to be appointed as personal representative for his wife's estate. Thereafter, MURDAUGH as the attorney for the Arthur Badger and his wife's estate, and LAFFITTE as an executive at Palmetto State Bank and the personal representative for Donna's estate, did conspire to surreptitiously misappropriate to MURDAUGH \$1,172,945.76 in funds from the settlement, in order in part to allow MURDAUGH to pay back hundreds of thousands of dollars of loans LAFFITTE had authorized from client funds in unrelated cases for which LAFFITTE also served as a fiduciary, as well as to allow MURDAUGH to pay other debts and personal expenses.

All in violation of Section 16-17-410 of the Code of Laws of South Carolina, 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/jejj)
ATTORNEY GENERAL