

STATE GRAND JURY OF SOUTH CAROLINA

STATE OF SOUTH CAROLINA,)	Case No: 2021-GS-47-30
)	
)	
)	SUPERSEDING
v.)	INDICTMENT FOR OBTAINING
)	SIGNATURE OR PROPERTY BY FALSE
)	PRETENSES, MONEY LAUNDERING,
)	COMPUTER CRIME, CRIMINAL
RICHARD ALEXANDER MURDAUGH,)	CONSPIRACY, FALSE STATEMENT OR
CORY HOWERTON FLEMING,)	MISREPRESENTATION, AND BREACH
)	OF TRUST WITH FRAUDULENT INTENT
Defendants.)	
_____)	

At a session of the State Grand Jury of South Carolina, convened in Columbia, South Carolina, on March 10, 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)
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 and personal representatives of Gloria Satterfield, who was his housekeeper of many years, MURDAUGH convinced 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 CORY HOWERTON FLEMING, lawyer who was a close friend of MURDAUGH. MURDAUGH and FLEMING convinced the Satterfield family to appoint a banker as personal representative for Gloria's estate, and then MURDAUGH and FLEMING convinced the personal representative as well as others involved in the litigation that settlement funds would be structured for the benefit of Gloria's estate. MURDAUGH and FLEMING ultimately had a settlement disbursement check for \$403,500 from FLEMING's trust account to be made out to "Forge", and FLEMING delivered the check to MURDAUGH. Forge Consulting, LLC, is a legitimate company often used by South Carolina lawyers to facilitate structured settlements. However, MURDAUGH deposited the \$403,500 check 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. The \$403,500 check contained what was supposed to be compensation to Gloria's sons for her death, but it also contained a split of FLEMING's fee which FLEMING – the plaintiff's lawyer -- was surreptitiously giving to MURDAUGH – the defendant in the action -- through the mechanism of the "Forge" check. Instead of compensating Gloria's sons for her death, MURDAUGH instead converted all of 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 purportedly 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 purportedly 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 and personal representatives of Gloria Satterfield, who was his housekeeper of many years, MURDAUGH convinced 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 CORY HOWERTON FLEMING, lawyer who was a close friend of MURDAUGH. MURDAUGH and FLEMING convinced the Satterfield family to appoint a banker as personal representative for Gloria's estate, and then MURDAUGH and FLEMING convinced the personal representative as well as others involved in the litigation that settlement funds would be structured for the benefit of Gloria's estate. MURDAUGH and FLEMING ultimately had a settlement disbursement check for \$2,961,931.95 from FLEMING's trust account to be made out to "Forge", and FLEMING delivered the check to MURDAUGH. Forge Consulting, LLC, is a legitimate company often used by South Carolina lawyers to facilitate structured settlements. However, MURDAUGH deposited the \$2,961,931.95 check 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. The \$2,961,931.95 check contained what was supposed to be compensation to Gloria's sons

for her death, but also included a split of FLEMING's fee which FLEMING – the plaintiff's lawyer -- was surreptitiously giving to MURDAUGH – the defendant in the action -- through the mechanism of the "Forge" check. Instead of compensating Gloria's sons for her death, MURDAUGH instead converted all of 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 purportedly 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 purportedly 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 and personal representatives of Gloria Satterfield, who was his housekeeper of many years, MURDAUGH convinced 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 CORY HOWERTON FLEMING, lawyer who was a close friend of MURDAUGH. MURDAUGH and FLEMING convinced the Satterfield family to appoint a banker as personal representative for Gloria's estate, and then MURDAUGH and FLEMING convinced the personal representative as well as others involved in the litigation that

settlement funds would be structured for the benefit of Gloria's estate. MURDAUGH and FLEMING ultimately had a settlement disbursement check for \$118,000 from FLEMING's trust account to be made out to "Forge", and FLEMING delivered the check to MURDAUGH. Forge Consulting, LLC, is a legitimate company often used by South Carolina lawyers to facilitate structured settlements. However, MURDAUGH deposited the \$118,000 check 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. The \$118,000 check contained what was supposed to be compensation to Gloria's sons for her death, but also included a split of FLEMING's fee which FLEMING – the plaintiff's lawyer -- was surreptitiously giving to MURDAUGH – the defendant in the action -- through the mechanism of the "Forge" check. Instead of compensating Gloria's sons for her death, MURDAUGH instead converted all of 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 purportedly 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 purportedly 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 TEN
CRIMINAL CONSPIRACY
S.C. Code Ann. § 16-17-410
CDR CODE: 0049**

That RICHARD ALEXANDER MURDAUGH and CORY HOWERTON FLEMING, in Beaufort County, on or about some time in March 2018 until on or about some time in October 2020, 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. § 38-55-540, and S.C. Code Ann. § 35-11-740, to wit:

While relying on his prestige and reputation as a lawyer, and the trust of the family and personal representatives of Gloria Satterfield, who was his housekeeper of many years, RICHARD ALEXANDER MURDAUGH convinced the family of Gloria Satterfield to hire FLEMING to represent Gloria's estate. Thereafter, MURDAUGH as the defendant in the action involving the Estate of Gloria Satterfield and FLEMING as the plaintiff's lawyer in the action did conspire to surreptitiously give MURDAUGH a split of FLEMING's fee from the multi-million dollar settlement.

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.

**COUNT ELEVEN
FALSE STATEMENT OR MISREPRESENTATION
\$50,000 OR MORE
S.C. Code Ann. § 38-55-540(A)(4)
CDR CODE: 3553**

That CORY HOWERTON FLEMING, in Beaufort County, on or about some time in January 2019, did, with an intent to injure, defraud, and deceive, knowingly make a false statement or misrepresentation, and did knowingly, assist, abet, solicit, or conspire with a person to make a false statement or misrepresentation, with the intent of obtaining

or causing another to obtain or attempting to obtain or causing another to obtain, an undeserved economic advantage or benefit, in connection with an insurance transaction, to wit:

While relying on his prestige and reputation as a lawyer, and the trust of the family and personal representatives of Gloria Satterfield, who was his housekeeper of many years, RICHARD ALEXANDER MURDAUGH convinced the family of Gloria Satterfield to hire FLEMING to represent Gloria's estate. Thereafter, MURDAUGH as the defendant in the action involving the Estate of Gloria Satterfield and FLEMING as the plaintiff's lawyer in the action did conspire to surreptitiously give MURDAUGH a split of FLEMING's fee from the insurance settlement. To achieve this criminal end, FLEMING caused \$403,500 in proceeds from an insurance settlement to be disbursed in a check on his trust account made out to "Forge", and delivered to MURDAUGH. FLEMING knew that this check was not going to the real Forge Consulting, LLC, and was not actually being used to set up a structure to benefit the beneficiaries of the Estate of Gloria Satterfield. Throughout FLEMING's representation and handling of the case, in dealings with others involved in the case, FLEMING as the plaintiff's lawyer made false statements and misrepresentations, and assisted, abetted, solicited, and conspired to make false statements and misrepresentations, about the manner in which the funds were going to be disbursed, about the setting up of an actual structure for the benefit of Gloria's estate (that never occurred), and about costs and fees incurred in the litigation, while failing to disclose his surreptitious arrangement with MURDAUGH. The undeserved economic advantage exceeded \$50,000.

All in violation of Section 38-55-540 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.

**COUNT TWELVE
FALSE STATEMENT OR MISREPRESENTATION
\$50,000 OR MORE
S.C. Code Ann. § 38-55-540(A)(4)
CDR CODE: 3553**

That RICHARD ALEXANDER MURDAUGH, in Beaufort County, on or about some time in January 2019, did, with an intent to injure, defraud, and deceive, knowingly make a false statement or misrepresentation, and did knowingly, assist, abet, solicit, or conspire with a person to make a false statement or misrepresentation, with the intent of obtaining or causing another to obtain or attempting to obtain or causing another to obtain, an undeserved economic advantage or benefit, in connection with an insurance transaction, to wit:

While relying on his prestige and reputation as a lawyer, and the trust of the family and personal representatives of Gloria Satterfield, who was his housekeeper of many years, MURDAUGH convinced the family of Gloria Satterfield to hire CORY HOWERTON FLEMING to represent Gloria's estate. Thereafter, MURDAUGH as the defendant in the

action involving the Estate of Gloria Satterfield and FLEMING as the plaintiff's lawyer in the action did conspire to surreptitiously give MURDAUGH a split of FLEMING's fee from the insurance settlement. MURDAUGH had created a bank account under the name "Richard A Murdaugh Sole Prop DBA Forge", 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. To achieve this end, MURDAUGH had FLEMING cause \$403,500 in proceeds from an insurance settlement to be disbursed in a check on FLEMING's trust account made out to "Forge", and delivered to MURDAUGH. MURDAUGH then deposited the check into the "Forge" account under his name and converted the proceeds to his personal use. Throughout MURDAUGH's involvement as a defendant in the case, and in his dealings with others involved in the case, MURDAUGH as the defendant made false statements and misrepresentations, and assisted, abetted, solicited, and conspired to make false statements and misrepresentations, about the nature of the claim, the manner in which the funds were going to be disbursed, and the setting up of an actual structure for the benefit of Gloria's estate (which never occurred), and about costs and fees incurred in the litigation, while failing to disclose his surreptitious arrangement with FLEMING. The undeserved economic advantage exceeded \$50,000.

All in violation of Section 38-55-540 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.

**COUNT THIRTEEN
BREACH OF TRUST WITH FRAUDULENT INTENT
S.C. Code Ann. § 16-13-230
CDR Code: 3424**

That CORY HOWERTON FLEMING did, in Beaufort County, on or about January 7, 2019, 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 the family of Gloria Satterfield, FLEMING did represent the Satterfield family in a wrongful death lawsuit against RICHARD ALEXANDER MURDAUGH for Gloria's untimely death on MURDAUGH's property. Upon receipt of an offer from an insurer to settle for MURDAUGH's policy limits of \$505,000.00, FLEMING deliberately failed to disclose the offer to his clients and instead secured the appointment of a bank employee to serve as personal representative of the Estate of Gloria Satterfield. FLEMING only disclosed the offer to the new personal representative, but materially failed to advise and direct him, and the Satterfield family was not made aware of the offer or settlement. FLEMING ultimately made out a settlement disbursement check for \$403,500.00 to "Forge", and delivered the check to MURDAUGH, the defendant in the Satterfield lawsuit. MURDAUGH then deposited the \$403,500.00 check into a bank account he had created under the name "Richard A Murdaugh Sole Prop DBA Forge" for the purpose of

misappropriating funds belonging to others. When FLEMING caused the check to be delivered to MURDAUGH, he knew this check was not actually going to the real Forge Consulting, LLC, but instead was going to MURDAUGH to further their criminal scheme. By these actions FLEMING breached the trust of his clients.

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

That CORY HOWERTON FLEMING, in Beaufort County, on or about January 9, 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:

RICHARD ALEXANDER MURDAUGH as the defendant in the action involving the Estate of Gloria Satterfield and FLEMING as the plaintiff's lawyer in the action did conspire to surreptitiously give MURDAUGH a split of FLEMING's fee from the insurance settlement. To achieve this end, FLEMING caused \$403,500 in proceeds from an insurance settlement to be disbursed in a check on his trust account made out to "Forge", and delivered to MURDAUGH. FLEMING knew that this check was not going to the real Forge Consulting, LLC, and was not actually being used to set up a structure for the beneficiaries of the Estate of Gloria Satterfield, but was being used to facilitate the illegal arrangement he had with MURDAUGH. 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 FIFTEEN
FALSE STATEMENT OR MISREPRESENTATION
\$50,000 OR MORE
S.C. Code Ann. § 38-55-540(A)(4)
CDR CODE: 3553**

That CORY HOWERTON FLEMING, in Beaufort County, on or about some time

in May 2019, did, with an intent to injure, defraud, and deceive, knowingly make a false statement or misrepresentation, and did knowingly, assist, abet, solicit, or conspire with a person to make a false statement or misrepresentation, with the intent of obtaining or causing another to obtain or attempting to obtain or causing another to obtain, an undeserved economic advantage or benefit, in connection with an insurance transaction, to wit:

While relying on his prestige and reputation as a lawyer, and the trust of the family and personal representatives of Gloria Satterfield, who was his housekeeper of many years, RICHARD ALEXANDER MURDAUGH convinced the family of Gloria Satterfield to hire FLEMING to represent Gloria's estate. Thereafter, MURDAUGH as the defendant in the action involving the Estate of Gloria Satterfield and FLEMING as the plaintiff's lawyer in the action did conspire to surreptitiously give MURDAUGH a split of FLEMING's fee from the insurance settlement. To achieve this end, FLEMING caused \$2,961,931.95 in proceeds from an insurance settlement to be disbursed in a check on his trust account made out to "Forge", and delivered to MURDAUGH. FLEMING knew that this check was not going to the real Forge Consulting, LLC, and was not actually being used to set up a structure to benefit the beneficiaries of the Estate of Gloria Satterfield. Throughout the FLEMING's representation and handling of the case, in dealings with others involved in the case, FLEMING as the plaintiff's lawyer made false statements and misrepresentations, and assisted, abetted, solicited, and conspired to make false statements and misrepresentations, about the manner in which the funds were going to be disbursed, about the setting up of an actual structure for the benefit of Gloria's estate

(that never occurred), and about costs and fees incurred in the litigation, while failing to disclose his surreptitious arrangement with MURDAUGH. The undeserved economic advantage exceeded \$50,000.

All in violation of Section 38-55-540 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.

**COUNT SIXTEEN
FALSE STATEMENT OR MISREPRESENTATION
\$50,000 OR MORE
S.C. Code Ann. § 38-55-540(A)(4)
CDR CODE: 3553**

That RICHARD ALEXANDER MURDAUGH, in Beaufort County, on or about some time in May of 2019, did, with an intent to injure, defraud, and deceive, knowingly make a false statement or misrepresentation, and did knowingly, assist, abet, solicit, or conspire with a person to make a false statement or misrepresentation, with the intent of obtaining or causing another to obtain or attempting to obtain or causing another to obtain, an undeserved economic advantage or benefit, in connection with an insurance transaction, to wit:

While relying on his prestige and reputation as a lawyer, and the trust of the family

and personal representatives of Gloria Satterfield, who was his housekeeper of many years, MURDAUGH convinced the family of Gloria Satterfield to hire CORY HOWERTON FLEMING to represent Gloria's estate. Thereafter, MURDAUGH as the defendant in the action involving the Estate of Gloria Satterfield and FLEMING as the plaintiff's lawyer in the action did conspire to surreptitiously give MURDAUGH a split of FLEMING's fee from the insurance settlement. MURDAUGH had created a bank account under the name "Richard A Murdaugh Sole Prop DBA Forge", 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. To achieve this end, MURDAUGH had FLEMING cause \$2,961,931.95 in proceeds from an insurance settlement to be disbursed in a check on FLEMING's trust account made out to "Forge", and delivered to MURDAUGH. MURDAUGH then deposited the check into the "Forge" account under his name and converted the proceeds to his personal use. Throughout the MURDAUGH's involvement as a defendant in the case, and in his dealings with others involved in the case, MURDAUGH as the defendant made false statements and misrepresentations, and assisted, abetted, solicited, and conspired to make false statements and misrepresentations, about the nature of the claim, the manner in which the funds were going to be disbursed, and the setting up of an actual structure for the benefit of the Estate (which never occurred), and about costs and fees incurred in the litigation, while failing to disclose his surreptitious arrangement with FLEMING. The undeserved economic advantage exceeded \$50,000.

All in violation of Section 38-55-540 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.

**COUNT SEVENTEEN
BREACH OF TRUST WITH FRAUDULENT INTENT
S.C. Code Ann. § 16-13-230
CDR Code: 3424**

That CORY HOWERTON FLEMING did, in Beaufort County, on or about May 13, 2019, 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 the family of Gloria Satterfield, FLEMING did represent the Satterfield family in a wrongful death lawsuit against RICHARD ALEXANDER MURDAUGH for Gloria's untimely death on MURDAUGH's property. Upon achieving a mediated settlement agreement with an insurer of MURDAUGH for \$3,800,000.00, and having already secured the appointment of a bank employee to serve as personal representative of the Estate of Gloria Satterfield, FLEMING deliberately failed to disclose the settlement to the Satterfield family. FLEMING only disclosed the offer to the new personal representative, and materially failed to advise or direct him, such that the Satterfield family was not made aware of the offer or

settlement. FLEMING ultimately made out a settlement disbursement check for \$2,961,931.95 to "Forge", and delivered the check to MURDAUGH, the defendant in the Satterfield lawsuit. However, MURDAUGH then deposited the \$2,961,931.95 check into a bank account he had created under the name "Richard A Murdaugh Sole Prop DBA Forge". When he caused the check to be delivered to MURDAUGH, FLEMING knew this check was not actually going to the real Forge Consulting, LLC, but instead was going to MURDAUGH to further their scheme. By these actions FLEMING breached the trust of his clients.

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

That CORY HOWERTON FLEMING, in Beaufort County, on or about May 15, 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:

RICHARD ALEXANDER MURDAUGH as the defendant in the action involving the Estate of Gloria Satterfield and FLEMING as the plaintiff's lawyer in the action did conspire to surreptitiously give MURDAUGH a split of FLEMING's fee from the insurance settlement. To achieve this end, FLEMING caused \$2,961,931.95 in proceeds from an insurance settlement to be disbursed in a check on his trust account made out to "Forge", and delivered to MURDAUGH. FLEMING knew that this check was not going to the real Forge Consulting, LLC, and was not actually being used to set up a structure for the beneficiaries of the Estate of Gloria Satterfield, but was being used to facilitate the illegal arrangement he had with MURDAUGH. 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 NINETEEN
FALSE STATEMENT OR MISREPRESENTATION
\$50,000 OR MORE
S.C. Code Ann. § 38-55-540(A)(4)
CDR CODE: 3553**

That CORY HOWERTON FLEMING, in Beaufort County, on or about some time in October 2020, did, with an intent to injure, defraud, and deceive, knowingly make a false statement or misrepresentation, and did knowingly, assist, abet, solicit, or conspire with a person to make a false statement or misrepresentation, with the intent of obtaining or causing another to obtain or attempting to obtain or causing another to obtain, an undeserved economic advantage or benefit, in connection with an insurance transaction, to wit:

While relying on his prestige and reputation as a lawyer, and the trust of the family and personal representatives of Gloria Satterfield, who was his housekeeper of many years, RICHARD ALEXANDER MURDAUGH convinced the family of Gloria Satterfield to hire FLEMING to represent Gloria's estate. Thereafter, MURDAUGH as the defendant in the action involving the Estate of Gloria Satterfield and FLEMING as the plaintiff's lawyer in the action did conspire to surreptitiously give MURDAUGH a split of FLEMING's fee from the insurance settlement. To achieve this end, FLEMING caused \$118,000 in proceeds from an insurance settlement to be disbursed in a check on his trust account made out to "Forge", and delivered to MURDAUGH. FLEMING knew that this check was not going to the real Forge Consulting, LLC, and was not actually being used to set up a structure to benefit the beneficiaries of the Estate of Gloria Satterfield. Throughout FLEMING's representation and handling of the case, in dealings with others involved in

the case, FLEMING as the plaintiff's lawyer made false statements and misrepresentations, and assisted, abetted, solicited, and conspired to make false statements and misrepresentations, about the manner in which the funds were going to be disbursed, about the setting up of an actual structure for the benefit of Gloria's estate (that never occurred), and about costs and fees incurred in the litigation, while failing to disclose his surreptitious arrangement with MURDAUGH. The undeserved economic advantage exceeded \$50,000.

All in violation of Section 38-55-540 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.

**COUNT TWENTY
FALSE STATEMENT OR MISREPRESENTATION
\$50,000 OR MORE
S.C. Code Ann. § 38-55-540(A)(4)
CDR CODE: 3553**

That RICHARD ALEXANDER MURDAUGH, in Beaufort County, on or about some time in October 2020, did, with an intent to injure, defraud, and deceive, knowingly make a false statement or misrepresentation, and did knowingly, assist, abet, solicit, or conspire with a person to make a false statement or misrepresentation, with the intent of obtaining

or causing another to obtain or attempting to obtain or causing another to obtain, an undeserved economic advantage or benefit, in connection with an insurance transaction, to wit:

While relying on his prestige and reputation as a lawyer, and the trust of the family and personal representatives of Gloria Satterfield, who was his housekeeper of many years, MURDAUGH convinced the family of Gloria Satterfield to hire CORY HOWERTON FLEMING to represent Gloria's estate. Thereafter, MURDAUGH as the defendant in the action involving the Estate of Gloria Satterfield and FLEMING as the plaintiff's lawyer in the action did conspire to surreptitiously give MURDAUGH a split of FLEMING's fee from the insurance settlement. MURDAUGH had created a bank account under the name "Richard A Murdaugh Sole Prop DBA Forge", 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. To achieve this end, MURDAUGH had FLEMING cause \$118,000 in proceeds from an insurance settlement to be disbursed in a check on FLEMING's trust account made out to "Forge", and delivered to MURDAUGH. MURDAUGH then deposited the check into the "Forge" account under his name and converted the proceeds to his personal use. Throughout the MURDAUGH's involvement as a defendant in the case, and in his dealings with others involved in the case, MURDAUGH as the defendant made false statements and misrepresentations, and assisted, abetted, solicited, and conspired to make false statements and misrepresentations, about the nature of the claim, the manner in which the funds were going to be disbursed, and the setting up of an actual structure for the benefit of the

Gloria's estate (which never occurred), and about costs and fees incurred in the litigation, while failing to disclose his surreptitious arrangement with FLEMING. The undeserved economic advantage exceeded \$50,000.

All in violation of Section 38-55-540 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.

**COUNT TWENTY-ONE
BREACH OF TRUST WITH FRAUDULENT INTENT
S.C. Code Ann. § 16-13-230
CDR Code: 3424**

That CORY HOWERTON FLEMING did, in Beaufort County, on or about October 6, 2020, 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 the family of Gloria Satterfield, FLEMING did represent the Satterfield family in a wrongful death lawsuit against RICHARD ALEXANDER MURDAUGH for Gloria's untimely death on MURDAUGH's property. Upon achieving a mediated settlement agreement with an insurer of MURDAUGH for \$3,800,000, and having already secured the appointment of

a bank employee of Palmetto State Bank to serve as personal representative of the Estate of Gloria Satterfield, FLEMING deliberately failed to disclose the settlement to the Satterfield family. FLEMING only disclosed the offer to the new personal representative, and materially failed to advise or direct him such that the Satterfield family was not made aware of the offer or settlement. FLEMING ultimately made out a settlement disbursement check for \$118,000.00 to "Forge", and delivered the check to MURDAUGH, the defendant in the Satterfield lawsuit. Forge Consulting, LLC, is a legitimate company often used by South Carolina lawyers, and previously used by FLEMING, to facilitate structured settlements. However, MURDAUGH then deposited the \$118,000.00 check into a bank account he had created under the name "Richard A Murdaugh Sole Prop DBA Forge". When he caused the check to be delivered to MURDAUGH, FLEMING knew this check was not actually going to the real Forge Consulting, LLC, but instead was going to MURDAUGH to further their criminal scheme. By these actions FLEMING breached the trust of his clients.

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

That CORY HOWERTON FLEMING, in Beaufort County, on or about October 6, 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:

RICHARD ALEXANDER MURDAUGH as the defendant in the action involving the Estate of Gloria Satterfield and FLEMING as the plaintiff's lawyer in the action did conspire to surreptitiously give MURDAUGH a split of FLEMING's fee from the insurance settlement. To achieve this end, FLEMING caused \$118,000 in proceeds from an insurance settlement to be disbursed in a check on his trust account made out to "Forge", and delivered to MURDAUGH. FLEMING knew that this check was not going to the real Forge Consulting, LLC, and was not actually being used to set up a structure for the beneficiaries of the Estate of Gloria Satterfield, but was being used to facilitate the illegal arrangement he had with MURDAUGH. 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 TWENTY-THREE
BREACH OF TRUST WITH FRAUDULENT INTENT
VALUE MORE THAN \$2,000 BUT LESS THAN \$10,000
S.C. Code Ann. § 16-13-230
CDR Code: 3423**

That CORY HOWERTON FLEMING did, in Beaufort County, on or about January 18, 2019, 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 the family of Gloria Satterfield, FLEMING did represent the Satterfield family in a wrongful death lawsuit against RICHARD ALEXANDER MURDAUGH for Gloria's untimely death on MURDAUGH's property. Upon receipt of an offer from an insurer to settle for MURDAUGH's policy limits of \$505,000.00, FLEMING deliberately failed to disclose the offer to his clients and instead secured the appointment of a bank employee to serve as personal representative of the Estate of Gloria Satterfield. FLEMING only disclosed the offer to the new personal representative, and materially failed to advise or direct him, such that the Satterfield family was not made aware of the offer or settlement. While holding

a portion of the \$505,000.00 in trust, FLEMING caused to be made out a check for \$8,000 to himself with the fictitious and fraudulent justification of "Expenses for Estate of Gloria Satterfield." Instead of compensating Gloria's sons for her death, FLEMING instead converted the money to his own personal use and quickly used it for expenses including but not limited to payment on his mortgage and a large credit card debt.

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 TWENTY-FOUR
MONEY LAUNDERING
VALUE MORE THAN \$300 BUT LESS THAN \$20,000
S.C. Code Ann. §35-11-740
CDR Code: 3937**

That CORY HOWERTON FLEMING, in Beaufort County, on or about January 9, 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:

While holding a portion of \$505,000.00 in settlement funds for the benefit of the Estate of Gloria Satterfield in trust, FLEMING caused to be made out a check from the trust account for \$8,000 to himself with the fictitious and fraudulent justification of "Expenses for Estate of Gloria Satterfield." Instead of compensating Gloria's sons for her death or otherwise appropriately disbursing the money, FLEMING instead converted the money to his own personal use with online and other financial transactions to include but not limited to payment on his mortgage and a large credit card debt. These funds were greater than \$2,000 but less than \$10,000.

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 TWENTY-FIVE
BREACH OF TRUST WITH FRAUDULENT INTENT
VALUE MORE THAN \$2,000 BUT LESS THAN \$10,000
S.C. Code Ann. § 16-13-230
CDR Code: 3423**

That CORY HOWERTON FLEMING did, in Beaufort County, on or about April 4, 2019, 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 the family of Gloria Satterfield, FLEMING did represent the Satterfield family in a wrongful death lawsuit against RICHARD ALEXANDER MURDAUGH for Gloria's untimely death on MURDAUGH's property. Upon receipt of an offer from an insurer to settle for MURDAUGH's policy limits of \$505,000.00, FLEMING deliberately failed to disclose the offer to his clients and instead secured the appointment of a bank employee to serve as personal representative of the Estate of Gloria Satterfield. FLEMING only disclosed the offer to the new personal representative, and materially failed to advise or direct him, such that the Satterfield family was not made aware of the offer or settlement. While holding a portion of the \$505,000.00 in trust, FLEMING caused to be made out a check for \$8,500 to himself with the fictitious and fraudulent justification of "Expert Mediation Expense Reimbursement." Instead of compensating Gloria's sons for her death or otherwise appropriately disbursing the money, FLEMING instead converted the money to his own personal use and used it for expenses including but not limited to debts owed to the IRS, video game entertainment, iTunes purchases, and a mortgage.

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 TWENTY-SIX
MONEY LAUNDERING
VALUE MORE THAN \$300 BUT LESS THAN \$20,000
S.C. Code Ann. § 35-11-740
CDR Code: 3937**

That CORY HOWERTON FLEMING, in Beaufort County, on or about April 4, 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:

While holding a portion of \$505,000.00 in settlement funds for the benefit of the Estate of Gloria Satterfield in trust, FLEMING caused to be made out a check from the trust account for \$8,500 to himself with the fictitious and fraudulent justification of "Expert Mediation Expense Reimbursement." Instead of compensating Gloria's sons for her death or otherwise appropriately disbursing the money, FLEMING instead converted the money to his own personal use with online and other financial transactions to include but not limited to payment for the IRS, video game entertainment, iTunes purchases, and a mortgage. These funds were greater than \$2,000 but less than \$10,000.

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 TWENTY-SEVEN
BREACH OF TRUST WITH FRAUDULENT INTENT
VALUE MORE THAN \$2,000 BUT LESS THAN \$10,000
S.C. Code Ann. § 16-13-230
CDR Code: 3423**

That CORY HOWERTON FLEMING did, in Beaufort County, on or about January 23, 2020, 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 the family of Gloria Satterfield, FLEMING did represent the Satterfield family in a wrongful death lawsuit against RICHARD ALEXANDER MURDAUGH for Gloria's untimely death on MURDAUGH's property. Upon achieving a mediated settlement agreement with an insurer of MURDAUGH for \$3,800,000.00, and having already secured the appointment of a bank employee to serve as personal representative of the Estate of Gloria Satterfield, FLEMING deliberately failed to disclose the offer to the Satterfield family. FLEMING only disclosed the offer to the new personal representative, and materially failed to advise or direct him, such that the Satterfield family was not made aware of the offer or settlement.

While holding a portion of the \$3,800,000.00 in trust, FLEMING caused to be made out a check for \$9,700 to himself with no justification. Instead of compensating Gloria's sons for her death or otherwise appropriately disbursing the money, FLEMING instead converted the money to his own personal use with various online and other financial transactions and used it for various 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 TWENTY-EIGHT
MONEY LAUNDERING
VALUE MORE THAN \$300 BUT LESS THAN \$20,000
S.C. Code Ann. § 35-11-740
CDR Code: 3937**

That CORY HOWERTON FLEMING, in Beaufort County, between on or about January 23, 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:

While holding a portion of \$3,800,000.00 in settlement funds for the benefit of the Estate of Gloria Satterfield in trust, FLEMING caused to be made out a check from the trust account for \$9,700 to himself with no express justification given. Instead of compensating Gloria's sons for her death or otherwise appropriately disbursing the money, FLEMING instead converted the money to his own personal use with online and other financial transactions. These funds were greater than \$2,000 but less than \$10,000.

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

That CORY HOWERTON FLEMING, in Beaufort County, between from on or about December of 2018 until on or about January of 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:

While holding settlement funds meant for the benefit of his clients in trust, FLEMING caused to be made out checks from the trust account to himself with fraudulent expense justifications or no justification whatsoever. FLEMING then converted the money to his own personal use with various online transactions and used it for various personal debts, 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 THIRTY
BREACH OF TRUST WITH FRAUDULENT INTENT
VALUE \$10,000 OR MORE
S.C. Code Ann. §16-13-230
CDR Code: 3424**

That CORY HOWERTON FLEMING did, in Beaufort County, from on or about December of 2018 until on or about September of 2021, willfully, unlawfully, and

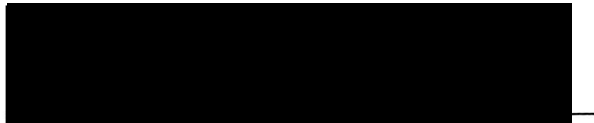
feloniously convert to his own use, with intention to permanently deprive the owner of possession, goods to which he had been entrusted by the owner for the care, keeping, and possession; to wit:

RICHARD ALEXANDER MURDAUGH as the defendant in the action involving the Estate of Gloria Satterfield and FLEMING as the plaintiff's lawyer in the action did conspire to surreptitiously give MURDAUGH a split of FLEMING's fee from the insurance settlement. To achieve this end, FLEMING caused a settlement disbursement sheets to be created with fraudulent amounts of prosecution expenses and estate funds. He also caused settlement funds to be disbursed for various reasons to further the scheme, by paying his legal fees, the very few legitimate costs, the personal representative's large fee, the fraudulent expense checks FLEMING had made out to himself, and the checks to MURDAUGH's fraudulent "Forge" account. Ultimately, \$113,800 remained in the trust account that was part of FLEMING's "cut" from the illegal scheme that he never disbursed to his clients or for any legitimate reason related to the litigation. By these actions, FLEMING breached the trust of his clients.

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.

A True Bill



FOREPERSON

Alan Wilson
ALAN WILSON (scw/jejj)
ATTORNEY GENERAL