

# McCULLOCH & SCHILLACI

## ATTORNEYS AT LAW

1732 HAMPTON STREET  
P.O. Box 11623 (29211)  
COLUMBIA, SC 29201  
(803) 779-0005 • FAX (803) 779-0666

JOSEPH M. McCULLOCH, JR.  
joe@mccullochlaw.com

KATHY R. SCHILLACI  
kathy@mccullochlaw.com

July 17, 2026

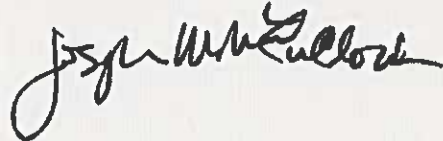
Colleton County Courthouse  
**Attn: The Honorable Gary A. Hale, Jr.**  
**Clerk of Court for General Sessions**  
101 Hampton Street  
Walterboro, South Carolina 29488

**RE: Myra Crosby, Petitioner IN RE:**  
**State of South Carolina v. Richard Alexander Murdaugh**  
**Indictment Nos.: 2022-GS-15-00592; -593; -594; and -595**

Dear Clerk of Court:

Please find enclosed **Petitioner's Response to the State's Motion to Unseal and Response to Motions to Unseal and Modify Protective Order** in the above-referenced matter. If you would, please file the enclosed document and return a file-stamped copy to the undersigned in the enclosed, self-addressed, pre-stamped envelope. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Joseph M. McCulloch

JUL 27 2026 PM 12:44  
COLLETON CO GS, GARY HALE

JMM/erg  
Enclosure(s)

STATE OF SOUTH CAROLINA

COUNTY OF COLLETON

Myra Crosby,

Petitioner / Intervenor,

IN RE:

State of South Carolina,

v.

Richard Alexander Murdaugh,

Defendant.

**COURT OF GENERAL SESSIONS  
FOURTEENTH JUDICIAL CIRCUIT**

Indictment Nos.: 2022-GS-15-00592;  
-593; -594; and -595

**PETITIONER'S RESPONSE TO THE  
STATE'S MOTION TO UNSEAL AND  
RESPONSE TO MOTIONS TO UNSEAL  
AND TO MODIFY PROTECTIVE ORDER**

On May 20, 2026, Petitioner filed her motion requesting the Court review certain Protective Orders in the captioned matter and "lift the Protective Orders" to the extent necessary to allow release of the jury tampering investigations of Rebecca Hill. Petitioner now responds to the July 3, 2026 filing of the Attorney General's Office, in which the Attorney General does not oppose lifting the Protective Orders, however several aspects of that filing require clarification:

1) Petitioner Myra Crosby, on July 22, 2024, filed a Motion to Unseal the *In-Camera* Proceedings (**Exhibit A**) that resulted in her removal from the Murdaugh murder jury. The Attorney General consented to Petitioner's request to unseal at that time, and the Court unsealed the *in-camera* proceedings to the limited extent of permitting Petitioner and her counsel access, but prohibited further dissemination. The purposes for which Petitioner sought access were then satisfied, and Petitioner has not sought any further unsealing regarding the in-camera proceedings in part now referenced by the Attorney General in its

JUL 27 2026 PM 12:45  
COLLETON CO GS GARY HALE

recent filing. Upon review of those in-camera materials released to Petitioner, none of those documents appear to relate to the State's jury tampering investigation, which is the purpose of this second Motion.

2) Petitioner served Freedom of Information Act requests (**Exhibit B**) on SLED, the Attorney General, and Eleventh Circuit Solicitor Rick Hubbard (who was tasked with oversight of the Becky Hill jury-tampering investigation); those FOIA requests sought the provision of their closed investigative files. The Attorney General and SLED responded that Justice Jean Toal's 2024 Protective Order, and perhaps previous Court Orders, prohibited release, although the investigation was closed, thereby eliminating any FOIA statutory bar to release.

3) Petitioner then filed her motion to declare that the purposes of that Protective Order have long since been accomplished and requested that the Protective Order be lifted.

#### **PETITIONER'S REQUEST AND POSITION:**

The purpose of FOIA is to "make it possible for citizens, or their representatives, to learn and report fully the activities of their public officials..." Petitioner believes that both she and the public are entitled to access the investigative efforts of the State for the purpose of reviewing those materials pertinent to the allegations of jury tampering by Becky Hill, if not others, and to critically evaluate that investigative effort by three separate law enforcement agencies. The announcement by the Solicitor at the Hill sentencing, that "...I don't know that I have enough based on what we have to even get an indictment...we cannot get a conviction because we cannot prove that case beyond a reasonable doubt" (**Exhibit C**) stands as a conundrum when compared to the S.C. Supreme Court opinion reversing the double-murder

convictions and granting a new trial. Open access and critical review are paramount considerations in the evaluation of government action.

The State in its recent filing asserts that substantial redactions are needed to protect the identity and privacy of the jurors, measures that seem unnecessary in light of the prior open-court testimony of those jurors, the participation of members of the jury panel in traveling to New York to appear on an NBC television news show, and the participation of jurors in recent documentaries (most recently Netflix). Petitioner concurs with any necessary redactions but believes this “need” perceived by the State should not hinder or delay this Court’s consideration of Petitioner’s request, nor the unsealing of the investigative materials and their provision to Petitioner.

Respectfully submitted,



Joseph M. McCulloch  
McCulloch & Schillaci, Attorneys at Law  
1732 Hampton Street  
P.O. Box 11623 (29211)  
Columbia, South Carolina 29201  
Telephone: (803) 779-0005  
joe@mccullochlaw.com

ATTORNEY FOR THE PETITIONER

Columbia, South Carolina  
this 15 day of July, 2026.

JUL 27 2026 PM12:45  
COLLETON CO GS. GARY HALE

## Exhibit A

FITSNEWS

JUL 27 2026 PM12:45  
COLLETON CO GS, GARY HALE

**McCULLOCH & SCHILLACI**  
**ATTORNEYS AT LAW**

1116 BLANDING STREET  
P.O. Box 11623 (29211)  
COLUMBIA, SC 29201  
(803) 779-0005 • Fax (803) 779-0666

**COPY**

JOSEPH M. McCULLOCH, JR.  
joe@mccullochlaw.com

KATHY SCHILLACI  
kathy@mccullochlaw.com

July 16, 2024

**Delivered Via U.S. Mail & Email**

Colleton County Clerk of Court, General Sessions  
101 Hampton Street  
P.O. Box 620  
Walterboro, South Carolina 29488  
[clerkofcourt@colletoncounty.org](mailto:clerkofcourt@colletoncounty.org)

**RE: State v. Richard A. Murdaugh**  
**Warrant Nos.: 2022-GS-15-00592; -00593; -00594; -00595**

Dear Clerk of Court:

Enclosed for filing, please find the original and one copy of the Motion to Unseal in connection with the above-referenced case. Please clock-in and file the original and clock-in and return the copy in the enclosed self-addressed, pre-stamped envelope. I greatly appreciate your assistance. Should you have any questions, please do not hesitate to contact me.

Sincerely,

  
Joseph M. McCulloch

JMM/erg  
Enclosure(s)

cc: Creighton Waters, Assistant Attorney General  
Richard A. Harpootlian  
James M. Griffin

STATE OF SOUTH CAROLINA  
COUNTY OF COLLETON

Ex. Rel.: State of South Carolina,

v.

Richard Alexander Murdaugh,

Defendant.

**COURT OF GENERAL SESSIONS  
FOURTEENTH JUDICIAL CIRCUIT**

Indictment Nos.: 2022-GS-15-00592;  
2022-GS-15-00593; 2022-GS-15-00594;  
2022-GS-15-00595

**MOTION TO UNSEAL**

COMES NOW Juror #785, by and through undersigned counsel, who moves this Court for an Order to unseal the Court exhibits (C1 – C5) and transcripts (to the extent any part is sealed) (hereinafter “records”) in the above-captioned matter. Counsel and client previously requested limited unsealing of the records for review, and upon consent of the prosecution and defense, the presiding judge at the time issued the Court’s Order (attached) stating that the records were unsealed upon the condition “that neither Counsel nor Juror No. 785 shall further publish or disseminate the materials.” Upon information and belief, the records were sealed to protect the confidentiality of the jurors. Upon further information and belief, however, the only juror affected by the court’s order and sealed documents is Juror #785. Defense counsel has consented to this request for unconditional unsealing of the records but the State indicates it cannot consent.

**THEREFORE**, undersigned counsel, on behalf of Juror #785, requests the records be unsealed for all public record purposes.

[signature block on following page]

Respectfully submitted,



McCulloch & Schillaci, Attorneys at Law  
Joseph M. McCulloch (SC Bar #3760)  
Kathy R. Schillaci (SC Bar #17248)  
1116 Blanding Street, First Floor  
P.O. Box 11623 (29211)  
Columbia, South Carolina 29201  
Telephone: (803) 779-0005  
[joe@mccullochlaw.com](mailto:joe@mccullochlaw.com)  
[kathy@mccullochlaw.com](mailto:kathy@mccullochlaw.com)

ATTORNEY FOR JUROR #785

Columbia, South Carolina  
this 12th day of July, 2024

JUL 22 2024 PM3:58  
COLLETON CO SS, P. GRANT

STATE OF SOUTH CAROLINA

COUNTY OF COLLETON

South Carolina,

Plaintiff,

v.

Richard Alexander Murdaugh,

Defendant.

IN THE COURT OF GENERAL SESSIONS  
FOURTEENTH JUDICIAL CIRCUIT

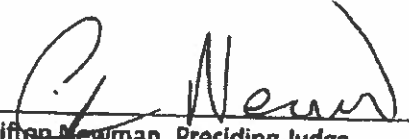
**ORDER TO UNSEAL RECORDS**

Case Nos.: 2022-GS-15-00592;  
2022-GS-15-00593;  
2022-GS-15-00594;  
2022-GS-15-00595

Counsel Joseph McCulloch by and on behalf of Juror No. 785, has requested the Court of General Sessions grant Counsel access to copies of the Court Exhibits as set forth on the attached Clerk's Exhibits pertinent to the removal of Juror No. 785 from the petit jury in the captioned matter. The Clerk's Exhibit reflects some pertinent materials filed as Court Exhibits during the "juror removal process" were sealed. Counsel requests access to all court records and court transcripts from the in-camera and open court proceedings pertinent to the removal process as well as court transcripts.

Counsel has consulted with Creighton Waters of the Attorney General's Office who has consented to Counsel's request subject to release pursuant to this Court's additional condition that neither Counsel nor Juror No. 785 shall further publish or disseminate the materials.

**IT IS SO ORDERED.**

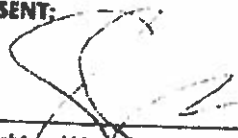
  
Clifton Newman, Presiding Judge

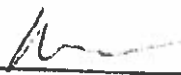
Columbia, South Carolina  
this 21 day of ~~October~~, 2023.  
*November*

**I SO MOVE:**

  
\_\_\_\_\_  
Joseph M. McCulloch, Esq.  
McCulloch & Schilli, Attorneys at Law  
1116 Blanding Street  
Columbia, South Carolina 29201  
Telephone: 803-779-0005  
Email: [jmc@mcclullochlaw.com](mailto:jmc@mcclullochlaw.com)

**I CONSENT:**

  
\_\_\_\_\_  
S. Creighton Waters, Esq.  
South Carolina Attorney General's Office  
P.O. Box 11549  
Columbia, South Carolina 29211  
Telephone: 803-734-3693  
Email: [cwaters@scag.gov](mailto:cwaters@scag.gov)

  
\_\_\_\_\_  
Richard A. Harpootlian, Esq.  
Richard A. Harpootlian, PA  
P.O. Box 1090  
Columbia, SC 29202  
Telephone: 803-252-4848  
Email: [rah@harpootlianlaw.com](mailto:rah@harpootlianlaw.com)

# RECEIPT FOR EXHIBITS

Court

Case No. 2022-GS-15-00592, 00593  
00594, 00595

Judge

Newman, C.

Plaintiff: State

Plf's Atty. Waters, Creighton

Defendant: Richard A. Murdaugh

Def's Atty. Harpoot'ian, Richard

Date Trial Started: 1-23-2023

Date Trial Ended: 3-3-2023

Received of Elizabeth Harris Court-Reporter for the above case, these exhibits:  
Michael Watkins

|                            | Clerk of Court Use |
|----------------------------|--------------------|
| C-1 SLED Report            |                    |
| C-2 Email to Judge         |                    |
| C-3 Jury Note              |                    |
| C-4 Interview CD           |                    |
| C-5 Emails Packet - Sealed |                    |
| 6                          |                    |
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| 20                         |                    |

This 3<sup>rd</sup> day of March 20 23.

Page 3 of 1

By: Rebecca H. Nee  
Rebecca H. Nee Clerk of Court - Colleton

Clerk should retain white copy in Civil cases, yellow copy in Criminal cases.

Revised 3/96

3/9/2023

Laura C. Hayes  
Sheryl R. Hayes  
 NAUTILUS 1004861

STATE OF SOUTH CAROLINA  
COUNTY OF COLLETON

Ex. Rel.: State of South Carolina,

v.

Richard Alexander Murdaugh,

Defendant.

COURT OF GENERAL SESSIONS  
FOURTEENTH JUDICIAL CIRCUIT

Indictment Nos.: 2022-GS-15-00592  
2022-GS-15-00593  
2022-GS-15-00594  
2022-GS-15-00595

CERTIFICATE OF SERVICE

I, Elizabeth Gunter, paralegal for McCulloch & Schillaci, Attorneys at Law, with offices located at 1116 Blanding Street, Columbia, South Carolina, hereby certify that on this 16<sup>th</sup> day of July, 2024, I have served a copy of the **Motion to Unseal** in connection with the above-captioned matter, by email and U.S. first-class mail, postage pre-paid to the below named parties at their address of record:

**S. Creighton Waters, Esq.**  
SC Attorney General's Office  
P.O. Box 11549  
Columbia, South Carolina 29211  
[cwaters@scag.gov](mailto:cwaters@scag.gov)

**Richard A. Harpootlian, Esq.**  
Richard A. Harpootlian, PA  
P.O. Box 1090  
Columbia, South Carolina 29202  
[rah@harpootlianlaw.com](mailto:rah@harpootlianlaw.com)

**James M. Griffin, Esq.**  
Griffin Humphries, LLC  
P.O. Box 999  
Columbia, South Carolina 29202  
[jgriffin@griffinhumphries.com](mailto:jgriffin@griffinhumphries.com)

JUL 22 2024 4:58  
COLLETON CO GS-P GRANT

  
Elizabeth Gunter, Paralegal

## Exhibit B

FITSNEWS

JUL 27 2026 PM12:46  
COLLETON CO GS, GARY HALE

**Liz Gunter**

---

**From:** Joe McCulloch  
**Sent:** Tuesday, May 5, 2026 5:05 PM  
**To:** Liz Gunter  
**Subject:** FW: SLED FOIA Request #2026-F0231 / Rebecca "Becky" Hill

Joseph M. McCulloch  
Attorney at Law  
McCulloch & Schillaci, Attorneys at Law  
P. O. Box 11623 (29211)  
1732 Hampton Street  
Columbia, South Carolina 29201  
(803) 779-0005

---

**From:** FOIA Requests <foi@sled.sc.gov>  
**Sent:** Tuesday, May 5, 2026 5:01 PM  
**To:** Joe McCulloch <joe@mccullochlaw.com>  
**Subject:** SLED FOIA Request #2026-F0231 / Rebecca "Becky" Hill

Good afternoon, Attorney McCulloch:

Please see the below link to download nonexempt public records responsive to your request. *See* S.C. Code Ann. §§ 30-4-20(c), 30-4-40(a)(4), 30-4-40(a)(3)(C), 30-4-40(a)(2) and 30-4-110(A). Please let our office know if you have trouble accessing these materials or have any questions or concerns.

[\[Click here to download\]](#)

Regards,  
Paul T. Ahearn, III  
Deputy General Counsel  
South Carolina Law Enforcement Division  
Office: (803) 896-4395



~~~~ CONFIDENTIALITY NOTICE ~~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

**McCulloch & Schillaci**  
**Attorneys at Law**

1732 Hampton Street  
P.O. Box 11623 (29211)  
Columbia, SC 29201  
(803) 779-0005 | Fax (803) 779-0666

Joseph M. McCulloch  
joe@mccullochlaw.com

Kathy R. Schillaci  
kathy@mccullochlaw.com

March 5, 2026

**Delivered Via Email**

South Carolina Law Enforcement Division  
**Attn: Freedom of Information Office**  
P.O. Box 21398  
Columbia, SC 29221  
[foi@sled.sc.gov](mailto:foi@sled.sc.gov)

**RE: FOIA Request**

To Whom It May Concern:

Pursuant to the state of South Carolina Freedom of Information Act, please receive this correspondence as a request for the full investigation into allegations of jury tampering against Rebecca Hill in State v. Murdaugh. Press reports documented the completion of the investigation and closure of that investigation in 2025, as was documented by Solicitor Rick Hubbard.

I will be happy to receive this information by email, mail, or in person if notified once ready. Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,



Joseph M. McCulloch

JMM/erg  
Enclosure(s)

1 STATE OF SOUTH CAROLINA )  
2 ) IN THE COURT OF  
3 COUNTY OF CALHOUN ) GENERAL SESSIONS  
4  
5 THE STATE, )  
6 Plaintiffs, )  
7 Vs ) CASE NO. 2025-GS-15-289  
8 MARY REBECCA HILL, ) 2025-GS-15-290  
9 Defendant )

10  
11 DECEMBER 8, 2025

12 ST. MATTHEWS, SOUTH CAROLINA  
13

14 HONORABLE HEATH P. TAYLOR, JUDGE  
15

16 A P P E A R A N C E S:

17 BY: SAMUEL R. HUBBARD, III, ESQUIRE

18 Attorney for the Plaintiffs

19 BY: WILLIAM C. LEWIS, ESQUIRE

20 Attorney for the Defendant  
21  
22  
23

24 KATHERINE A. SPIRES

25 REGISTERED PROFESSIONAL REPORTER

1           The Court has a different standard,  
2 obviously, and I know there is appellate issues in  
3 *Murdaugh*, that's not my concern. My only and sole  
4 concern was, what evidence do we have and then can  
5 I prove it in a court of law beyond a reasonable  
6 doubt? And the answer is, frankly, I don't know  
7 that I have enough based on what we have to even  
8 get an indictment. But I do know this based on my  
9 35 years experience, and the collective experience  
10 of the team we have, we cannot get a conviction  
11 because we cannot prove that case beyond a  
12 reasonable doubt.

13           Your Honor, those are the major issues  
14 we looked at. As Mrs. Hill pleads today, she has  
15 no record. And, again, other than the misconduct  
16 charges being from common law to a statute, there  
17 are no recommendations or negotiations as to the  
18 sentence.

19           THE COURT: All right. Mrs. Hill, do  
20 you substantially agree with the facts that the  
21 Solicitor just told me?

22           MRS. HILL: Yes, Your Honor.

23           THE COURT: I find there is a  
24 substantial factual basis for the decision to plead  
25 guilty. I find that her decision to plead guilty



ALAN WILSON  
ATTORNEY GENERAL

June 9, 2026

VIA EMAIL

Mr Joseph M. McCulloch, Jr  
[joe@mccullochlaw.com](mailto:joe@mccullochlaw.com)

Ms. Elizabeth Gunter  
[liz@mccullochlaw.com](mailto:liz@mccullochlaw.com)

RE: Freedom of Information Act ("FOIA") Request

Dear Mr. McCulloch:

The Office of the South Carolina Attorney General (the "Office") has received your FOIA request dated May 11, 2026, which requests:

The entire investigation relating to jury tampering allegations in the State v. Alex Murdaugh murder trial, including but not limited to, allegations that the Clerk of Court and/or others allegedly tampered with the jury and trial process to affect the verdict.

Pursuant to your request, the records of the Office were searched, and all of the responsive records we located are exempt from production under FOIA pursuant to S.C. Code Ann. § 30-4-40(a)(2), (3)(C), and (4), and the attached court orders.

While the Office supports the release of these records, with the appropriate redactions, and indeed has filed a motion with the Supreme Court to that effect, we are unable to release them at this time due to the attached court orders. Should a court issue an order unsealing the records, the Office would invite you to submit a new FOIA at that time.

Sincerely yours,

The Office of the South Carolina  
Attorney General

**McCULLOCH & SCHILLACI**  
**ATTORNEYS AT LAW**

1732 HAMPTON STREET  
P.O. Box 11623 (29211)  
COLUMBIA, SC 29201  
(803) 779-0005 • FAX (803) 779-0666

JOSEPH M. McCULLOCH, JR.  
joe@mccullochlaw.com

KATHY R. SCHILLACI  
kathy@mccullochlaw.com

May 11, 2026

**Delivered Via Email**

South Carolina Attorney General's Office

**Attn: FOIA Office**

P.O. Box 11549

Columbia, SC 29211

**Email: foia@scag.gov**

**RE: FOIA Request**  
**Pursuant to S.C. Code Ann. §30-4-10 et seq.**

To Whom It May Concern:

Pursuant to the South Carolina Freedom of Information Act (S.C. Code Ann. §30-4-10 et seq.), I request access to and copies of the following information and public records:

- The entire investigation relating to jury tampering allegations in the State v. Alex Murdaugh murder trial, including but not limited to, allegations that the Clerk of Court and/or others allegedly tampered with the jury and trial process to affect the verdict.

Should estimated FOIA costs exceed \$50, please contact my office with the estimated cost prior to fulfilling this request. I will be happy to receive this information by email, mail, or in person if notified once ready. Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,



Joseph M. McCulloch

JMM/erg

cc: Alan Wilson

**From:** Jennifer Jones  
**To:** Joe McCulloch; Liz Gunter  
**Cc:** Al Fargle; Rick Hubbard  
**Subject:** Receipt of FOIA Request dated May 11, 2026  
**Date:** Tuesday, May 19, 2026 12:06:33 PM

---

Dear Mr. McCulloch:

This email is to inform you the 11<sup>th</sup> Circuit Solicitor's Office received your request for records pursuant to the South Carolina Freedom of Information Act.

Please also allow this correspondence to serve as the 11<sup>th</sup> Circuit Solicitor's Office final determination that our office will provide all "public records", as defined by S.C. Code Ann. § 30-4-20, that are not exempt from disclosure pursuant to S.C. Code Ann. § 30-4-40, as soon as is practicable. Accordingly, as soon as all responsive materials are processed and prepared for transmittal, the 11<sup>th</sup> Circuit Solicitor's Office will notify you. Please also note South Carolina FOIA law specifically provides that this "determination is not required to include a final decision or express an opinion as to whether specific portions of the document or information may be subject to redaction according to exemptions provided for by Section 30-4-40 or other state or federal laws." *Id.*

If you have any questions or concerns, please contact our office at 803-785-8584 or via email at [jkjones@lexingtoncounty.sc.gov](mailto:jkjones@lexingtoncounty.sc.gov) . Thank you.

Sincerely,

**Jennifer K. Jones**  
Case Manager / Victim Advocate

Eleventh Circuit Solicitor's Office  
205 East Main St.  
Lexington, SC 29072  
Phone: (803) 785-8584  
Fax: (803) 785-8255  
Email: [JKJones@lexingtoncounty.sc.gov](mailto:JKJones@lexingtoncounty.sc.gov)

#### **NOTE NEW EMAIL ADDRESS**

**CONFIDENTIALITY NOTICE:** This transmission may contain identifying information that is protected from disclosure by applicable federal and/or state law. This communication is intended for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited and may subject the violator to civil and/or criminal penalties. If you have received this communication in error, please notify us immediately by telephone or by replying to this e-mail and destroying all copies of this message and all attachments.

Begin forwarded message:

**From:** Liz Gunter <[liz@mccullochlaw.com](mailto:liz@mccullochlaw.com)>  
**Date:** May 11, 2026 at 4:24:24 PM EDT  
**To:** Rick Hubbard <[RHubbard@lexingtoncounty.sc.gov](mailto:RHubbard@lexingtoncounty.sc.gov)>  
**Cc:** Joe McCulloch <[joe@mccullochlaw.com](mailto:joe@mccullochlaw.com)>  
**Subject:** FOIA Request

You don't often get email from [liz@mccullochlaw.com](mailto:liz@mccullochlaw.com). [Learn why this is important](#)

Good afternoon. Please see the attached FOI request. Should you have any questions or require additional information, please do not hesitate to contact the office. Thanks! -Liz

Elizabeth R. Gunter  
Paralegal  
McCulloch & Schillaci, Attorneys at Law  
P. O. Box 11623 (29211)  
1732 Hampton Street  
Columbia, South Carolina 29201  
(803) 779-0005

---

**Confidentiality Notice**

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately either by phone (803-779-0005) or reply to this e-mail and delete all copies of this message.

To ensure compliance with the requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including the attachments) is not intended or written to be used, for the purpose of (a) avoiding penalties under the Internal Revenue Code or (b) promoting, marketing or recommending to another party any transaction or tax-related matter[s]. To provide you with a communication that could be used to avoid penalties under the Internal Revenue Code will necessarily entail additional investigations, analysis and conclusions on our part.

**McCULLOCH & SCHILLACI**  
**ATTORNEYS AT LAW**

1732 HAMPTON STREET  
P.O. Box 11623 (29211)  
COLUMBIA, SC 29201  
(803) 779-0005 • FAX (803) 779-0666

JOSEPH M. McCULLOCH, JR.  
joe@mccullochlaw.com

KATHY R. SCHILLACI  
kathy@mccullochlaw.com

May 11, 2026

**Delivered Via Email**

Eleventh Circuit Solicitor's Office  
**Attn: Rick Hubbard**  
205 East Main Street, Suite 309  
Lexington, South Carolina 29072  
**Email: rhubbard@lex-co.com**

**RE: FOIA Request**  
**Pursuant to S.C. Code Ann. §30-4-10 et seq.**

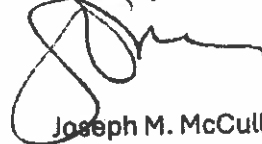
Dear Mr. Hubbard:

Pursuant to the South Carolina Freedom of Information Act (S.C. Code Ann. §30-4-10 et seq.), I request access to and copies of the following information and public records:

- The entire investigation relating to jury tampering allegations in the State v. Alex Murdaugh murder trial, including but not limited to, allegations that the Clerk of Court and/or others allegedly tampered with the jury and trial process to affect the verdict.

Should estimated FOIA costs exceed \$50, please contact my office with the estimated cost prior to fulfilling this request. I will be happy to receive this information by email, mail, or in person if notified once ready. Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,



Joseph M. McCulloch

JMM/erg

## Exhibit C

JUL 27 2026 PM12:47  
COLLETON CO GS. GARY HALE

FITSNEWS

1 STATE OF SOUTH CAROLINA )  
2 ) IN THE COURT OF  
3 COUNTY OF CALHOUN ) GENERAL SESSIONS  
4  
5 THE STATE, )  
6 Plaintiffs, )  
7 Vs ) CASE NO. 2025-GS-15-289  
8 MARY REBECCA HILL, ) 2025-GS-15-290  
9 Defendant )  
10  
11 DECEMBER 8, 2025  
12 ST. MATTHEWS, SOUTH CAROLINA  
13  
14 HONORABLE HEATH P. TAYLOR, JUDGE  
15  
16 A P P E A R A N C E S:  
17 BY: SAMUEL R. HUBBARD, III, ESQUIRE  
18 Attorney for the Plaintiffs  
19 BY: WILLIAM C. LEWIS, ESQUIRE  
20 Attorney for the Defendant  
21  
22  
23  
24 KATHERINE A. SPIRES  
25 REGISTERED PROFESSIONAL REPORTER

1           The Court has a different standard,  
2 obviously, and I know there is appellate issues in  
3 *Murdaugh*, that's not my concern. My only and sole  
4 concern was, what evidence do we have and then can  
5 I prove it in a court of law beyond a reasonable  
6 doubt? And the answer is, frankly, I don't know  
7 that I have enough based on what we have to even  
8 get an indictment. But I do know this based on my  
9 35 years experience, and the collective experience  
10 of the team we have, we cannot get a conviction  
11 because we cannot prove that case beyond a  
12 reasonable doubt.

13           Your Honor, those are the major issues  
14 we looked at. As Mrs. Hill pleads today, she has  
15 no record. And, again, other than the misconduct  
16 charges being from common law to a statute, there  
17 are no recommendations or negotiations as to the  
18 sentence.

19           THE COURT: All right. Mrs. Hill, do  
20 you substantially agree with the facts that the  
21 Solicitor just told me?

22           MRS. HILL: Yes, Your Honor.

23           THE COURT: I find there is a  
24 substantial factual basis for the decision to plead  
25 guilty. I find that her decision to plead guilty

STATE OF SOUTH CAROLINA

COUNTY OF COLLETON

Myra Crosby,

Petitioner / Intervenor,

IN RE:

State of South Carolina,

v.

Richard Alexander Murdaugh,

Defendant.

**COURT OF GENERAL SESSIONS  
FOURTEENTH JUDICIAL CIRCUIT**

Indictment Nos.: 2022-GS-15-00592;  
-593; -594; and -595

**CERTIFICATE OF SERVICE**

I, Elizabeth Gunter, paralegal for McCulloch & Schillaci, Attorneys at Law, with offices located at 1732 Hampton Street, Columbia, South Carolina, hereby certify that on this 17<sup>th</sup> day of July, 2026, I have served a copy of the **Petitioner's Response to the State's Motion to Unseal and Response to Motions to Unseal and to Modify Protective Order** in connection with the above-captioned matter, by U.S. Mail, postage pre-paid to the below named parties at their address of record:

**S. Creighton Waters, Esq.  
S.C. Attorney General's Office  
P.O. Box 11549  
Columbia, South Carolina 29211**

**Richard A. Harpootlian, Esq.  
Richard A. Harpootlian, P.A.  
P.O. Box 1090  
Columbia, South Carolina 29202**

JUL 27 2026 PM 12:48  
COLLETON CO GS, GARY HALE

  
Elizabeth Gunter, Paralegal