

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF <u>LAURENS</u>)	THE EIGHTH JUDICIAL CIRCUIT
)	
LAURENS COUNTY, SOUTH CAROLINA)	
)	CASE NO. 2026-CP -30-_____
PLAINTIFF)	
)	
VS.)	SUMMONS
)	
JOHN DOE and JANE DOE,)	
)	
DEFENDANTS.)	

TO: JOHN DOE AND JANE DOE, THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONDED and required to Answer the Complaint in this action, a copy of which is herewith served upon you and to serve a copy of your Answer to said Complaint on the subscriber at this office at 935 Broad Street, Camden, South Carolina 29020, within thirty (30) days after the service hereof, exclusive of the day of such service; and on your failure to do so, judgment by default will be rendered against you for the relief demanded in the Complaint.

RESPECTFULLY SUBMITTED,

**SMITH ROBINSON HOLLER
DuBOSE AND MORGAN, LLC**

By: s/H. Thomas Morgan, Jr.
H. THOMAS MORGAN, JR. (SC Bar No.73585)
Email: tommy.morgan@smithrobinsonlaw.com
ATTORNEY FOR PLAINTIFF
LAURENS COUNTY, SOUTH CAROLINA
935 Broad Street
Post Office Drawer 39
Camden, South Carolina 29021
(803) 572-8460

March 5, 2026

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF <u>LAURENS</u>)	THE EIGHTH JUDICIAL CIRCUIT
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LAURENS COUNTY, SOUTH CAROLINA)	
)	CASE NO. 2026-CP -30-_____
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PLAINTIFF)	PLAINTIFF'S COMPLAINT
)	
VS.)	
)	
JOHN DOE and JANE DOE,)	
)	
DEFENDANTS.)	

Plaintiff, Laurens County, South Carolina, a body politic and political subdivision of the State of South Carolina, (hereinafter "County" or "Plaintiff"), sues Defendants, John Doe, and Jane Doe, and alleges as follows:

NATURE OF THE CASE

1. Introductory Statement. This is an action for unjust enrichment, expedited accounting and injunctive relief arising out of a cyber-attack wherein certain perpetrators orchestrated a scam utilizing electronic communications and unlawfully gained access to monies from County's bank account that were intended to pay valid payment applications from its contractor.

PARTIES, JURISDICTION, AND VENUE

2. Nature of the Action. This is an action seeking monetary damages, exclusive of interest, costs and attorneys' fees, as well as an expedited accounting and order for injunctive relief pursuant to Rule 65(b), SCRPC. This action is within the jurisdiction of this Court.

3. Plaintiff. Laurens County is a political subdivision of the State of South Carolina.

4. Defendants. Defendants John Doe and Jane Doe are unknown and conspired to carry out the complex cybercrime and movement of stolen monies more fully described below. The identity of the Defendants is currently unknown, as they have perpetrated the subject scheme

in secrecy utilizing electronic communications.

5. Venue. Pursuant to S.C. Code Ann. § 15-7-30, venue is proper in Laurens County, South Carolina because the causes of action alleged herein accrued in Laurens County.

GENERAL ALLEGATIONS

6. The Fraudulent Email Contact. On or about December 15, 2025, the cyber criminals began contacting County, by email, impersonating County's contractor, Mashburn Construction Company, Inc. (hereinafter "the Contractor"). The cyber criminals, purporting to be the Contractor, provided County with fraudulent electronic funds transfer ("EFT") instructions directing funds be sent from County's bank accounts to an account held at Wells Fargo Bank, N.A. identified as Account #7560962206 (hereinafter the "Target Account"). A copy of the fraudulent EFT instructions is attached hereto as "**Exhibit A.**"

7. The EFT Transfer. In reliance on the emails and fraudulent EFT instructions, County effectuated four (4) EFTs totaling \$1,558,288.09 to the Target Account with the intent to make payments towards pay applications owed by County to Contractor as follows:

- a. A transfer, on or about December 29, 2025, in the amount of \$122,278.76 from its bank account at United Community Bank;
- b. A transfer, on or about January 12, 2026, in the amount of \$14,647.00 from its bank account at United Community Bank;
- c. A transfer, on or about January 13, 2026, in the amount of \$611,585.82 from its bank account at US Bank; and
- d. A transfer, on or about January 13, 2026, in the amount of \$809,776.51 from its bank account at US Bank.

8. Misappropriated Funds. Using trickery and deception, the perpetrators gained

access to County's funds and, without the knowledge or consent of County, misappropriated a total of \$1,558,288.09. Plaintiff is in need of expedited discovery and emergency relief in order to trace the flow of funds and recover the stolen proceeds.

9. Internet Fraud. Unbeknownst to Plaintiff, the email and attachment referenced above were fraudulent and were part of what the Federal Bureau of Investigation has named "Business Email Compromise" ("BEC"). The e-mail originated from a domain created by the fraudsters which is almost identical to the domain of the Contractor. The EFTS, which were intended to be paid to the Contractor were not received by the Contractor, but instead were diverted and misappropriated by the Defendants.

10. Discovery of the Fraud. County subsequently discovered that it had been defrauded and that unknown perpetrators had received the EFTs from County's bank accounts. Upon discovering this fraud, County took immediate action to recall the transfer, notified the authorities, and now brings this action in order to mitigate the damages.

FIRST CAUSE OF ACTION – UNJUST ENRICHMENT

11. Plaintiff realleges and incorporates by reference Paragraphs 1 through 10 above as if fully set forth herein.

12. This is an action for unjust enrichment against Defendants John Doe and Jane Doe.

13. Plaintiff conferred a benefit upon Defendants which Defendants are not entitled to keep.

14. Defendants have received and accepted the benefit under circumstances where the retention of the benefit by the Defendants would be inequitable and unjust.

15. As a direct and proximate cause, Plaintiff has suffered money damages.

SECOND CAUSE OF ACTION – EXPEDITED ACCOUNTING

16. Plaintiff realleges and incorporates by reference Paragraphs 1 through 15 above as

if fully set forth herein.

17. This is an action for an expedited accounting.

18. Defendants, John Doe and Jane Doe, received certain monies from Plaintiff that did not belong to them and to which they are not entitled.

19. It is essential that this Court enter an order granting an expedited accounting in order to ascertain the location of all funds.

THIRD CAUSE OF ACTION –INJUNCTIVE RELIEF

20. Plaintiff realleges and incorporates by reference Paragraphs 1 through 19 above as if fully set forth herein.

21. County requires injunctive relief in the form of an order freezing funds held in the Target Account referenced in paragraphs 6-7, to prevent the fraudulent and unlawful use of said funds.

22. County lacks a plain, speedy, and adequate remedy at law to mandate that the funds held in the Target Account be frozen to prevent the fraudulent and unlawful use of said funds while County undertakes necessary steps to have said funds returned to County.

23. Injunctive relief is the necessary, appropriate remedy to ensure that the funds held in the Target Account be frozen to prevent the fraudulent and unlawful use of said funds while County undertakes necessary steps to have said funds returned to County.

24. County is likely to succeed on the merits, the balance of equities favors County, and injunctive relief is in the public interest.

PRAYER FOR RELIEF

WHEREFORE, based on the foregoing and the common and statutory laws of the State of South Carolina, the pleadings filed herein, affidavits, exhibits, and legal memoranda that may

hereafter be filed with the Court, Plaintiff, Laurens County, South Carolina, respectfully requests that this Court:

- Enter its Judgment for money damages in favor of Plaintiff.
- Enter an order requiring an expedited accounting and an audit from Defendants of all monies deposited into the Target Account identified above.
- Enter an order imposing and creating a constructive trust over any and all proceeds in the possession of any of the Defendants.
- Enter an order for injunctive relief in the form of freezing funds held in the Target Account to prevent the fraudulent and unlawful use of said funds unless and until all funds fraudulently and unlawfully transferred into the Target Account are returned to County.
- And for any further relief, including costs and attorneys' fees, that the court deems just and appropriate under the circumstances against Defendants, John Doe and Jane Doe.

RESPECTFULLY SUBMITTED,

**SMITH ROBINSON HOLLER
DuBOSE AND MORGAN, LLC**

By: *s/H. Thomas Morgan, Jr.*
H. THOMAS MORGAN, JR. (SC Bar No.73585)
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