

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO. 1:24-00412

18 U.S.C. § 1344(2)

18 U.S.C. § 1349

18 U.S.C. § 2

VS.

THOMAS ALLEN BATEMAN, JR.
CODY LEE ANDERSON

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

BACKGROUND

1. M.C. was a resident of Aiken County, South Carolina.
2. M.C. was born on February 1, 1933, and died on January 5, 2022. M.C. was 88 years old when she died.
3. M.C. was preceded in death by her husband, J.C., who died on December 10, 2012.
4. M.C. resided at the Cumberland Village community from shortly after her husband's death until May 2018. From May 2018 until her death in January 2022, M.C. resided at the Shadow Oaks Assisted Living Facility.
5. M.C. executed a will on October 17, 2001 (2001 will) with the assistance of Attorney W.R.M., a person known to the grand jury. The 2001 will stipulated that if M.C. was not survived by her husband J.C., all of her assets would be left to various friends and charitable organizations.

6. M.C.'s financial assets were held in deposit and investment accounts at Security Federal Bank, Bank of America, and Merrill Lynch. Each bank's funds are insured by the Federal Deposit Insurance Corporation (FDIC).

7. **THOMAS ALLEN BATEMAN, JR.** was a resident of Aiken County, South Carolina, and served as the Power of Attorney for M.C. from June 27, 2019, until she died on January 5, 2022.

8. **CODY LEE ANDERSON** was a resident of Aiken County, South Carolina and is the owner and director of the George Funeral Home.

SCHEME AND ARTIFACE TO DEFRAUD

9. Beginning at a date unknown to the grand jury, but at least since on or about June 27, 2019, through on or about April 5, 2022, the defendants, **THOMAS ALLEN BATEMAN, JR.** and **CODY LEE ANDERSON**, intentionally devised and intended to devise a scheme and artifice to defraud, to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution by means of materially false and fraudulent pretenses, representations, and promises, by manipulating and enticing M.C. to sign a will which left all her assets to **THOMAS ALLEN BATEMAN, JR.**, and designated **CODY LEE ANDERSON** as the personal representative of M.C.'s estate when M.C. was incapable of making a knowing, intelligent, and voluntary determination regarding disposition of her assets because of mental defect or infirmity.

MANNER AND MEANS

It was part of the scheme that:

10. **CODY LEE ANDERSON** obtained a form will with blanks that could be filled in electronically or written by hand.

11. **CODY LEE ANDERSON** edited the new will (2020 will) to reflect that all of M.C.'s property and assets, real and personal, would go exclusively to **THOMAS ALLEN BATEMAN, JR.**

12. The 2020 will designated **CODY LEE ANDERSON** as the personal representative of M.C.'s estate.

13. As the personal representative, **CODY LEE ANDERSON**, was entitled to five percent of the value of M.C.'s estate.

14. At a time known to the grand jury, **THOMAS ALLEN BATEMAN, JR.**, transported M.C. from Shadow Oaks Assisted Living to the George Funeral Home.

15. Once M.C. arrived at the George Funeral Home, she remained in the front seat of **THOMAS ALLEN BATEMAN, JR.**'s, vehicle. **CODY LEE ANDERSON** asked three employees of the George Funeral Home -- K.H.C, L.H., and E.F., persons known to the grand jury -- to witness the signing of a document. However, **CODY LEE ANDERSON** did not identify the document for the three employees.

16. On or about January 6, 2022, the day after M.C.'s death, **CODY LEE ANDERSON** instructed an employee of the George Funeral Home, E.R.T., a person known to the grand jury, to deliver the 2020 will to the Hull Barrett law firm to begin the probate process.

17. The 2020 will delivered to Hull Barrett contained a signature purporting to be that of M.C. The 2020 will left the entirety of M.C.'s estate to **THOMAS ALLEN BATEMAN, JR.**

COUNT ONE
Conspiracy

18. Paragraphs 1 through 17, above, are incorporated herein by reference as setting forth a scheme and artifice to defraud.

19. Beginning at a date unknown to the grand jury, but at least since on or about June 27, 2019, through on or about April 5, 2022, in the District of South Carolina, the defendants, **THOMAS ALLEN BATEMAN, JR.** and **CODY LEE ANDERSON**, knowingly and intentionally combined, conspired, confederated, agreed, and had a tacit understanding to knowingly obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution, by means of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344(2);

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO
(Bank Fraud)

20. Paragraphs 1 through 17, above, are re-incorporated and re-alleged herein by reference as setting forth a scheme and artifice to defraud.

21. Beginning at a date unknown to the grand jury, but at least since on or about June 27, 2019, through on or about April 5, 2022, in the District of South Carolina, the defendants, **THOMAS ALLEN BATEMAN, JR.** and **CODY LEE ANDERSON**, did knowingly attempt to obtain the moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution, Security Federal Bank, by means of materially false and fraudulent pretenses, representations, and promises, in that **THOMAS ALLEN BATEMAN, JR.** and **CODY LEE ANDERSON**, did cause the generation of the 2020 will, transferring the assets of M.C. to **THOMAS ALLEN BATEMAN, JR.**, and abrogating the terms of the 2001 will;

In violation of Title 18, United States Code, Sections 1344(2) and 2.

COUNT THREE
(Bank Fraud)

22. Paragraphs 1 through 17, above, are re-incorporated and re-alleged herein by reference as setting forth a scheme and artifice to defraud.

23. Beginning at a date unknown to the grand jury, but at least since on or about June 27, 2019, through on or about April 5, 2022, in the District of South Carolina, the defendants, **THOMAS ALLEN BATEMAN, JR.** and **CODY LEE ANDERSON**, did knowingly attempt to obtain the moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution, Bank of America, by means of materially false and fraudulent pretenses, representations, and promises, in that **THOMAS ALLEN BATEMAN, JR.** and **CODY LEE ANDERSON**, did cause the generation of the 2020 will, transferring the assets of M.C. to **THOMAS ALLEN BATEMAN, JR.**, and abrogating the terms of the 2001 will;

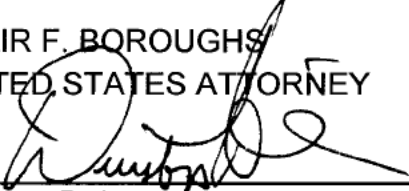
In violation of Title 18, United States Code, Sections 1344(2) and 2.

A TRUE BILL



FOREPERSON

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