

SOUTH CAROLINA LAW ENFORCEMENT DIVISION/ "SLED"

Pages 1 of 2

Attn: Major Paul Grant ¹ Over Investigative Division

Attachments -15

P.O. Box 21398

Columbia, S.C. 29221 - 803-896-5355

From: Ms. Thedford A. Rowser-Hall-Bey**Public Citizen/a/k/a Legal Researcher/CONSULTANT****P.O. Box 1535 Platt, Spring Rd. #5603, West Columbia, SC 29171****Phone/or can be reached at all times – 803-673-6143**

REF: Major Paul Grant's request to be in WRITING, so that SLED can RESPOND IN WRITING –
 The requested Copy of SLED's alleged filed SEARCH WARRANTS (see ***attached [partial] Federal S.C. Richland County's Court's TRANSCRIPT dated "November 10, 2009"*** shows and/or admits to - SEARCH WARRANT[s]) issued on JUNE 15, 2007 to SLED/***State Law Enforcement Division*** THEN "Narcotics Investigator"/Mr. Albert William WATSON, in reference to Mr. Joseph BRUNSON, Timothy McQUEEN, Tony POUGH/a/k/a CCG/Capital Consortium Group LLC/&3-HEBREW BOYS LLC's personal PROPERTIES admitted! BEING REMOVED/a/k/a "SEIZED" by an alleged SEARCH WARRANT allegedly issued to SLED's Officer/or said Investigator Albert W. Watson, **WHO NEVER! Produced on ANY COURT (nor Free of Information Acts) FILED RECORDS ANY! alleged SEARCH WARRANT(s) issued to SLED on said DATE "JUNE 15, 2007", WHICH RESULTED in the FEDERAL! OFFICIALS' in the YEAR 2007 and later-up into this YEAR 2015 - Caused the Illegal INCARCERATIONS, and Later IMPRISONMENTS, as well as the DESTRUCTION! of Personal PROPERTIES, and the ILLEGAL! CLOSING/or TERMINATION of the LEGAL! REGISTERED! BUSINESSES! CCG/Capital Consortium Group; 3-HEBREW BOYS; & DANIAL DEVELOPMENT GROUP's LLC – Since! the YEAR 2007 *(See also attached FBI- "Aaron M. Hawkins" signed Sworn! under OATH AFFIDAVIT dated "Aug. 1, 2007"-Confirms said LEGAL REGISTERED Businesses)**

Dear Mr. Grant;

In response to your returned call, and/or our telephone conversation held on the date "September 14, 2015" regarding the above reference matter(s) involving SLED's above said Investigator, Albert W. WATSON's alleged SEARCH WARRANT(s), allegedly issued as of the date "JUNE 15, 2007", in which SLED's prior/or said officials (all) has found that NO! SEARCH WARRANT(s) Ever! existed, you asked me to provide you with a copy of a Court Order involving the said above (said 3-Agents), Brunson, McQueen, and Pough's Court's participation/or requests within the said South Carolina's Court(s) regarding their filed requests for RELIEF from ILLEGAL (Jailing)/IMPRISONMENTS, involving the Law "28 U.S.C. 2255" which has been filed/and/or yet pending in this year 2015, which was ONLY by GRANTED!² by said Court due to the said INNOCENT/above named illegal Imprisoned persons Pough, McQueen and Brunson's Court filed Requests must have **"...CONCLUSIVELY!! SHOW that the Prisoner is Entitled to no Relief,..."**;

¹ Investigative Services – Paul Grant, Major • Implementation of a Case Management and Records Management System is anticipated to increase efficiency.

2 28 U.S. Code § 2255 - Federal custody; remedies on motion attacking sentence, states: (a) A prisoner in custody under sentence of a court established by Act of Congress claiming the right to be released upon the ground that the sentence was imposed in violation of the Constitution or laws of the United States, or that the court was without jurisdiction to impose such sentence, or that the sentence was in excess of the maximum authorized by law, or is otherwise subject to collateral attack, may move the court which imposed the sentence to vacate, set aside or correct the sentence. (b) Unless the motion and the FILES and RECORDS of the Case CONCLUSIVELY!! SHOW that the Prisoner is Entitled to no Relief, the COURT SHALL! CAUSE NOTICE THEREOF to be SERVED UPON the UNITED STATES ATTORNEY, Grant...thereon, Determine the Issues and make Findings of FACTS and CONCLUSIONS of LAW with respect thereto.

Therefore, the attached, Federal [partial] Transcript November 10, 2009/Exh. 1 thru 5; Exhibit AA-4 of the U.S. Federal Court's "TEXT ORDER GRANTING..." the South Carolina's U.S. Attorney(s) request/or motion for EXTENSION for Time so!! to! FILE their RESPONSE!! to "Joseph B. Brunson, Timothy McQueen, and Tony B. Pough's" Federal court Filed "PETITION, pursuant to 28 U.S.C. § 2255" – is a copy of the said Court Order in which we also discussed by said telephone communication on about September 14, 2015, which shows the said Federal Court indeed GRANTED the said Petitioners, Pough, McQueen and Brunson's PETITION TO FILED each of their REQUESTED RELIEF from their illegal IMPRISONMENT, pursuant under the LAW 28 U.S.C. § 2255; and by the said South Carolina's Federal Court GRANTED said Petitioners' rights to RECEIVED a WRITTEN RESPONSE from the said South Carolina's U.S. Attorney(s), according with that SAME said filed LAW, the said Federal court WOULD NOT HAVE GRANTED Petitioners, Brunson, McQueen and Pough's filed said Petitioner under 28 U.S.C. 2255 UNLESS! (the said illegal held Prisoners, Pough, McQueen and Brunson) "...CONCLUSIVELY!! SHOWED that the Prisoner is Entitled to no Relief..." from each of their also said illegal Sentencing, due to, Court RECORDED RECORDS SHOWS, that SLED's said OFFICER/or Investigator, Mr. Albert William WATSON, own! SLED records shows! SLED's Investigator Albert W. WATSON, NEVER! RECEIVED! any! Legal required (Judge signed) Grand Jury SEARCH WARRANT(s) as of the alleged DATE, "JUNE 15, 2007" which resulted in the said ILLEGAL IMPRISONMENT of the (3) INNOCENT Individuals, Pough, McQueen & Brunson's since 2007 up 2015.

THEREFORE, in accordance also with our said telephone conversation, it was ADMITTED that SLED Office/or Officials (as well as ABSOLUTELY NO State! nor! Federal Court RECORDS), as well as the Freedom of Information Act COULD NEVER! could PRODUCE ANY! SLED's said filed SEARCH WARRANT(s) issued on "JUNE 15, 2007", involving Pough, McQueen nor Brunson, which resulted in SLED's said Office/or said Officer/investigator A.W. Watson Never! had absolutely ANY Legal Grounds/or Legal Rights to have WENT INTO said Businesses, and BANK!! RECORDS!!/or assisted others to went into CCG/3-HEBREW BOYS/and DANIEL DEVELOPMENT GROUP...etc.al BANK RECORDS, as well as, assisted others! shown to also have illegally TAKEN their Personal PROPERTIES to have been HELD/OR in Control of SLED's Office Official(s), in which RECORDED RECORDS shows (which signed also!! by the **STATE!! COURT! Sumter County REPLACEMENT JUDGE GEORGE C. JAMES' ORDER!** filed within the Richland County Court of Common Pleas Case no. 2007-CP-40-03116 and 2007-GS-40-0474, dated "NOVEMBER 21, 2007" and/also dated "DEC. 13, 2010", ADMITS that State! Court! ORDERS! has (2) INJUNCTIONS,

(as well as the FBI attached AFFIDAVITS of Special Agents Grosse and HAWKINS, dated AUG. 1st, 2nd, 2007/Exhs. A&G-1,2,3; and dated MAY 27, 2008/Exhs I, I-3; SCAG's Affidavits of Robert McBurny and 5/31/2007 State Court TRANSCRIPT of SCAG alleged Financial Auditor/Ms. Sandra Matthews) confirms! **(TWO DIFFERENT! AMOUNTS of illegally HELD! MONEYS) OVER! \$17. MILLION, and! over \$82. MILLION DOLLARS** of the said above **BUSINESSES**, managed by the said **ILLEGAL IMPRISONED** Individuals, Pastor, Joseph B. Brunson, Minister, Timothy McQueen and Mr. Tony B. Pough, whose Court filed RECORDED shows that **SOUTH CAROLINA, ATTORNEY GENERAL OFFICE**, and the former, **S.C. Security Commissioner/MR. HENRY D. McMASTER**, (illegally) assisted, involving SLED's Agent **ALBERT W. WATSON** in the taking **POSSESSION** of over about **\$1. BILLION!! DOLLARS**, as of the DATE!! "JUNE 15, 2007", due to Non-produced SEARCH WARRANT(s) to SLED said Official; which the said Federal COURT TRANSCRIPTS ADMITS/or SHOWS over about, 18 BOXES Of **UNCASHED!! CASHIERS** (which are ONLY PAPER/and/not! actual! MONEY, since said Cashiers Checks were not CASHED, but is **UNDISPUTED**, was **HELD! BY SLED Office/and/or its Investigator/Albert W. WATSON**, who Assisted **IN HIS INDIVIDUAL CAPACITY/ S.C. former Security Commissioner/Mr. HENRY D. McMASTER**, illegally removed over about a **BILLION Dollars**), resulted in actually CAUSING also GREAT! Physical and Financial HARM and DAMAGES to over about 14 THOUSANDS INDIVIDUALS involved with the said Businesses CCG/3-HEBREW BOYS and DANIEL DEVELOPMENT GROUP...etc.al. ****(See attached Exh. Cc)**

FURTHERMORE, you and I also further discussed briefly, that the South Carolina's LEGAL OFFICIALS, the now former! SCAG/and yet! present! S.C. Attorney Governor HENRY D. McMASTER, is AGAIN! illegally involved in the ILLEGAL TAKING of MONEYS, (in which he/HENRY D. McMASTER is present! scheduled, to go before the S.C. Ethic! Commissioner[s] in the month of OCTOBER 2015), which appears to also involves SLED's Officer Albert W. WATSON's UNFOUND/or Fraud "JUNE 15, 2007" alleged SEARCH WARRANT(s), which also illegally took MONEYS, which MAY have assisted in Mr. HENRY D. McMASTER also in his running for Governor, in the YEAR 2010, SUPPORTED by SCAG's attached Exh. 18-A Letter dated "DECEMBER 7, 2010" signed by SCAG's now! former/employee, Mr. Warren V. Ganjehsani; and Exh. 5-1/dated 08/17/2007.

WHEREFORE, Mr. Grant, you and I also stated that you, or SLED Office could respond/and/or provide in WRITING, to be mailed, showing/or acknowledging that SLED Office never! showed where SLED's Officer/or Investigator, Mr. Albert William WATSON, ever! was issued a SEARCH WARRANT(s) on the date "JUNE 15, 2007", involving the said alleged! (also questionable-S.C. GRAND JURY) ARRESTS, of the said individuals, Joseph B. Brunson, Timothy McQueen and Tony Pough.

September 17, 2015

cc: non/Attorney Steve McKinze/803-435-8847

cc: Public Interest/and additional Evidence please contact

Sincerely,

Ms. T.A. Rowser-Hall-Bey

Public Citizen/of Interest

Ms. T.A. Rowser-Hall-Bey

ATTACHMENTS -15

“SLED”/STATE LAW ENFORCEMENT DIVISION
OFFICIAL/Major PAUL GRANT
REFERENCE

SLED INVESTIGATOR/ALBERT W. WATSON
none-produced “JUNE 15, 2007” SEARCH WARRANT(s)
Involving – former/SCAG/S.C. Security
COMMISSIONER/Mr. HENRY D. McMASTER, with South
Carolina’s Secretary of State’s – LICENSED/or STATE!
REGISTERED - “LLC” Businesses CCG/3-HEBREW
BOYS/and DANIEL DEVELOPMENT GROUP/and its said
Business’ Agents/Managers – Pastor, Joseph Brunson,
Minister-Timothy McQueen and Mr. Tony Pough
****(ILLEGAL Jailing/and IMPRISONED, since! 2007 up
until 2015 – due to SLED’s Non-produced alleged
GRAND! JURY ORDERED! SEARCH WARRANT(s)
dated “JUNE 15, 2007)***

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

UNITED STATES OF AMERICA,

PLAINTIFF,

vs.

TIMOTHY MCQUEEN, TONY B
POUGH, JOSEPH B BRUNSON,

DEFENDANTS.

CR. NO. 3:08-615

COLUMBIA, SC

NOVEMBER 10, 2009

VOLUME I

BEFORE THE HONORABLE MARGARET B. SEYMOUR
UNITED STATES DISTRICT COURT JUDGE
JURY TRIAL

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

FOR THE GOVERNMENT:

WINSTON D HOLLIDAY, AUSA
MARK C MOORE, AUSA
UNITED STATES ATTORNEY'S OFFICE
1441 MAIN STREET, SUITE 500
COLUMBIA, SC 29201

FOR TIMOTHY MCQUEEN:

LOUIS H LANG, ESQ.
CALLISON, TIGHE AND ROBINSON
PO BOX 1390
COLUMBIA, SC 29202

FOR TONY B POUGH:

PARKS SMALL, FPD
FEDERAL PUBLIC DEFENDER
1901 ASSEMBLY STREET, SUITE 200
BB&T BUILDING
COLUMBIA, SC 29201

FOR JOSEPH B BRUNSON:

W. MICHAEL DUNCAN, ESQ.
AUSTIN, LEWIS AND ROGERS
PO BOX 11716
COLUMBIA, SC 29211

COURT REPORTER:

KATHLEEN RICHARDSON, RPR, CRR
UNITED STATES COURT REPORTER
901 RICHLAND STREET
COLUMBIA, SC 29201

STENOTYPE-COMPUTER-AIDED TRANSCRIPTION

1 THE COURT: All right. The Government may call its
2 first witness.

3 MR. MOORE: Thank you, Your Honor. May it please
4 the Court. The United States calls Special Agent Billy
5 Watson.

6 ALBERT WILLIAM WATSON, Government's witness, after
7 being sworn, testified as follows:

8 DIRECT EXAMINATION

9 BY MR. MOORE:

10 Q Morning, Watson. How are you?

11 A Fine, sir. You?

12 Q I'm doing well. You are currently employed where?

13 A State Law Enforcement Division, SLED.

14 Q Okay. And what do you do for SLED?

15 A Presently right now I'm a narcotics investigator.

16 Q Okay. And what's your title there?

17 A Special Agent

18 Q All right. Prior to going to work at SLED, you had
19 another career; correct?

20 A That's correct.

21 Q Okay. Actually two?

22 A That's correct.

23 Q Where were you employed prior to going to SLED?

24 A I was a special--

25 Q Immediately prior.

Exh. 3

48

1 A I was a special agent with the Drug Enforcement
2 Administration.

3 Q Okay. And how long were you a DEA agent?

4 A Approximately 23 years.

5 Q Okay. And prior to going to DEA, did you also work for
6 another federal law enforcement agency?

7 A I worked approximately two years for the Internal
8 Revenue Service as a investigator for them.

9 Q Okay. All right. So you have some background in
10 financial investigations; is that correct?

11 A That's correct sir.

12 Q All right. Now, at some point were you assigned an
13 investigation which was then just a state investigation of
14 the Three Hebrew Boys?

15 A Yes, sir. I was.

16 Q Okay. And when were you assigned that investigation,
17 Mr. Watson?

18 A June of 2007.

19 Q Okay. And what were the allegations that you were
20 looking into?

21 A The major allegation was securities fraud.

22 Q Okay. On the State level?

23 A On the State level, yes, sir.

24 Q Is there a state statute that prescribes selling
25 securities without a license?

ASSIGNED!
by SCA 6

EX 4.4
STATE-LED investigation

WATSON and TWO other Agents "SEEK" the
"SERVICE" of CCG and on 6-15-2007
Said Agents - on 6-15-2007
the same day of the STATE arrests
and started: STATE's investigation on 6-15-2007

STATE-LED investigation

SCAS on the
State!
Adm. to
Arrests
of Pough
McQueen
Brunson
on 6-15-2007
without a warrant

1 A Yes, sir, there is.
2 Q And is the State investigation and possible prosecution
3 also ongoing at this time? Admits State!! Prosecution!!
4 A Yes, sir, it is. 2009-Yet!! Ongoing!! since!!
5 Q Now, at some point in your investigation, in the State
6 investigation, did you and other agents working with you seek
7 their service?
8 A Yes, sir, we did.
9 Q And at also at some point did you have the occasion on
10 the State charges to arrest the three defendants in this
11 case, Mr. Brunson, Mr. McQueen and Mr. Pough?
12 A Yes, sir, I did.
13 Q All right. And on what date did you arrest these three
14 gentlemen Mr. Brunson, Mr. McQueen and Mr. Pough?
15 A June 15th, 2007.
16 Q All right. Now, did you actually physically have to
17 arrest two of them?
18 A Yes, sir, I did.
19 Q Okay. And who did you actually physically arrest?
20 A Mr. Pough and Mr. McQueen.
21 Q Okay. And what about Mr. Brunson?
22 A He turned himself in to us at the Alvin Glenn Detention
23 Center.
24 Q Right. Now, when you physically arrest someone, do you
25 do anything to process them?

Arrested
agents
by an
alleged
Grand
Jury
ARREST
WATSON
↓
But!
No!
Records
where
Grand
Jury
Ever!
met!
on
Date!
June
15,
2007?
Therefor
show
Also false
or 7 days
Arrest
documents
SEARCHED BY
SLED!

Exh. 5

SLED Watson agent
Admitted
Documents
Seized
from
Thumb
and
Turned
over
to
FBI
Agents
Grosse
Hawkins
"After
the
Date
6-15-01
2001"

SLED Admits!
Computer
Center
Illegally
Thumbed
Drives
Documents
Without
a
Search
Warrant
that
were
given
4/01
FBI
agents
Grosse
+
Hawkins

and the other one is a Memorex.

Q Okay. At some point did the Computer Crime Center

process those thumb drives and provide you with copies of

some documents that were seized therefrom that was of

assistance to you and later that you and other agents from

SLED turned over to Special Agents Grosse and Hawkins?

A Yes, sir, he did.

MR. MOORE: Your Honor, at this point I move 4A, 4B
and 4C into evidence.

THE COURT: Any objection?

MR. LANG: No objection, Your Honor.

THE COURT: It's admitted.

(WHEREUPON, Government's Exhibits 4a, 4b, 4c were
admitted into evidence.)

MR. MOORE: Thank you, Your Honor. May I approach
and get those back and give them to Miss Deal?

THE COURT: You may.

BY MR. MOORE:

Q Now, you also mentioned that you executed a search
warrant.

A Yes, sir, that's correct.

Q On what day did you execute a search warrant and where
was the search warrant executed?

A The search warrant was executed at 1529 Horseshoe Circle
which was the business address for the Capital Consortium

Admitted to
New
Warrant
Executed
During
the
Hawkins
Grosse
Business
Hawkins
AT
Bled
on
Horse
Shoe
Circle

Admitted to
give said
Thumb Drive
Directly to
Judge M.O.
Seymour's
Blek!
Deal!
and
never
properly
alleged
SLED
issue
an
alleg.
Search
Warrant
filed
by prosecutor

Exh 57

Acknowledges Federal Court and State Court - Both participation with the Receiver Ashmore - since in the year 2007 - claiming the same properties against order...
Federal U.S. Asst. Atty. Holliday Jr.
Shown Always participation of the State Court - SCAG office of Henry McMaster...
which shows! Both! The State Court and Federal Court was claiming the same properties and money involving 3-HBS-CCG Business - 14 thousands - Depositors since in the year 2007... with the State Court - yet! Claiming the same properties being claimed by the Federal Court - Therefore - The Federal Court's Filed Pre-indictment Restraining Order - Filed Aug. 1st 2007 in Federal Court - was never! Valid - and must be Dismissed - or vacated, even if U.S. Atty. Federal 21 USC 853(e)(2)

Admits! to Double Jeopardy...
and Unethical Practice Closed
Involved same named witnesses named by Defendants in their Interruption 1-19-2012

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

IN RE: NO. 3:07-mc-135
A MATTER UNDER INVESTIGATION
BY GRAND JURY NUMBER 1
(#2007R00845) FILED UNDER SEAL

MOTION FOR DISCLOSURE

NOW COMES THE GOVERNMENT, through its undersigned attorney, and moves this Court to allow disclosure to the South Carolina Attorney General's Office and the Richland County Court of Common Pleas of the contents of a sealed Pre-Indictment Restraining Order entered in this case August 15, 2007. The Government believes that a motion to appoint a receiver is currently pending in the Richland County Court of Common Pleas, and that the disclosure of the Pre-Indictment Restraining Order in this matter, which has already appointed a receiver on behalf of this Court, would promote judicial economy by reducing the possibility of a duplicative and conflicting appointment.

Respectfully submitted,
REGINALD I. LLOYD
UNITED STATES ATTORNEY
By: s/ WINSTON D. HOLLIDAY, JR. (#7597)
Assistant United States Attorney
WINSTON HOLLIDAY
Assistant United States Attorney
1441 Main Street, Suite 500
Columbia, South Carolina 29201
Telephone: (803) 929-3079
FAX: (803) 254-2943
ATTORNEY FOR THE UNITED STATES

* Asst. U.S. Atty. Always made known to Subject Judge Seymour that the Federal Closed #07-mc-00135-mbs was doing "Duplicative" By: "...and Conflicting" appointments...
Judge M. B. Seymour's Affected Order - Dated 8-20-2007 - Shows Judge Seymour - Ordered Federal Judge to participate with State Court...

Therefore - The Federal Court's Filed Pre-indictment Restraining Order - Filed Aug. 1st 2007 in Federal Court - was never! Valid - and must be Dismissed - or vacated, even if U.S. Atty. Federal 21 USC 853(e)(2)

Shows
Federal Judge Seymour Always
checked. Jurisdiction over
civil and criminal
case matters - which also!
Involved! the said
Third Parties - pursuant
w/ Prosecution's Request
21 USC 853(c) and (d) E

HENRY MCMASTER
SECURITIES COMMISSIONER



December 7, 2010

The Hon. George C. James, Jr.
Judge, Third Judicial Circuit
P.O. Box 1716
Sumter, South Carolina 29151

Re: McMaster v. Capital Consortium Group, LLC; et al.
C.A. No. 07-CP-40-3116

Dear Judge James:

This letter is to apprise the court of the status of the above-referenced matter and the manner in which the South Carolina Attorney General's Office intends to proceed from this point forward. We are directing this correspondence to you based upon the Richland County Clerk of Court's records reflecting you as the judge assigned to this case.

As you may know, the individual defendants in this action - Tony Pough, Timothy McQueen, and Joseph Brunson - are awaiting sentencing in a federal criminal case in which they have been found guilty on numerous counts. Our Office has been monitoring the federal case for some time, and we have determined that the primary objectives of our state action have been met by the federal case's disposition. We are therefore informing the court that Plaintiff no longer intends to pursue the state civil action under these circumstances. Our Office's decision in this regard effectively moots a pending motion to intervene by the group of investors represented by John T. Mobley, Esq.

Accordingly, enclosed is a proposed dismissal order that we have prepared for your review. If acceptable, please execute the dismissal and return it to us in the envelope provided.

By copy of this letter to all counsel of record and pro se defendants, we are the proposed order on them as well.

Sincerely yours,

Warren V. Ganjehsani
Assistant Attorney General

WVG/shb

Encl.

CCG- Investors Filed
Henry McMaster
et al

EXH-18-A
This 5-44's Letter 1-2
Conflict! New 1-2
AG's Requested - Repeated
Claims - 5-12-2011
This Letter and Order
of Dismissal Confirms!
The Federal Court
Judge Seymour
Always knew she
lacked jurisdiction
to have filed the
Federal Restraining Order
On Aug. 1st 2007 - when
State Court had jurisdiction
2007 Dec. 1st 2010 - by
Judge George C. James Jr
State Court

* Shows Federal Court
Never Had Jurisdiction in
Motion for Restraining Order
Judge's original
Aug. 2007 pursuant to
21 USC 853(c)(2)
See Attached
Exh. 17-c

Richland County Judges
Disqualified themselves
since year
2007...
5 Sept 2007
2 page
S.L. Stat
Court D
on C
C.C.

PRE-INDICTMENT RESTRAINING ORDER AFFIDAVIT

1. This affidavit is being made in support of an application of a Pre-Indictment Restraining Order for assets owned or related to individuals and/or organizations involved in transactions that are in violation of U.S. Code, title 18 sections 2314 to wit:

2. I, Aaron M. Hawkins, am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), assigned to the Columbia Division. I have been so employed for approximately twelve years, during which time I have conducted numerous investigations of various types of white collar crimes. The information contained in this affidavit is based on my personal knowledge and observation or as otherwise reported.

BACKGROUND REGARDING INITIATION OF INVESTIGATION

3. The South Carolina Attorney General's Office (SCAG) provided the Columbia Division of the Federal Bureau of Investigation (FBI) information alleging that Tony Pough, Joseph Brunson, and Timothy McQueen were operating a high yield investment/debt elimination scam under names of "3 Hebrew Boys" (3HB) and/or "Capital Consortium Group" (CCG). Specifically, 3HB/CCG's primary claim is they can satisfy an investor's debt (mortgage, auto and/or credit card) or provide monthly income through extraordinarily high yields from investments in the Foreign Exchange Market (FOREX).

POUGH'S, MCQUEEN'S AND BRUNSON'S CONNECTION TO CCG/3HB

4. Certified Records were obtained from the South Carolina Secretary of State for 3HB and CCG. Those records state 3HB and CCG are both South Carolina limited liability companies formed on 9/16/2004. 3HB was organized by Pough, McQueen and Brunson and CCG was organized by TMS Family Trust and Brunson Outreach. Brunson Outreach is a South Carolina non-profit corporation incorporated by Isolde Brunson. The address for Brunson Outreach, 209 Raintree Drive, Hopkins, is the same address on the driver's license of Joseph Brunson. Isolde Brunson is possibly Brunson's wife.

5. Bank records obtained from Bank of America (BOA) and First Citizens Bank (FCB) clearly establish that Pough, Brunson

Ekh-A
Federal FBI Agents Always Admitted SCAG provided FBI and Federal officials with information on CCG & 3HB's Business and paid Business Agents Pough, McQueen and Brunson
Regarding CCG's Bank Accounts at BOA With Out!! Any! Search! Warrants Before!! The Date! June/ or June 15, 2007 when SCAS Admits it obtaining an Alleged Search Warrant Involving Law Enforcement SLED Agent Watson's Also Date of April 1st Agents due to Pough's

Exh. AA4

Orders on Motions

3:08-cr-00615-MBS USA v.
Brunson et al **CASE CLOSED on**
01/14/2011

2255, CLOSED, CUSTODY

U.S. District Court

District of South Carolina

Notice of Electronic Filing

The following transaction was entered on 7/2/2013 at 11:15 AM EDT and filed on 7/2/2013

Case Name: USA v. Brunson et al

Case Number: 3:08-cr-00615-MBS

Filer:

Document Number: 512 (No document attached)

Docket Text:

TEXT ORDER granting [511] Motion for Extension of Time to File Response as to Joseph B Brunson (1), Timothy McQueen (2), Tony B Pough (3). The court grants the Government's motion for extension of time, ECF No. [511], to respond to Petitioners' motions pursuant to 28 U.S.C. § 2255, so that the Government has sufficient time to obtain affidavits from Petitioners' former attorneys. Also, the court grants the Government's motion for an order requiring Petitioners' former attorneys to submit affidavits in response to the Government's request. Signed by Honorable Margaret B Seymour on 7/2/2013. (mdea)

3:08-cr-00615-MBS-2 Notice has been electronically mailed to:

Louis H Lang louislang@callisontighe.com, crystalsmith@callisontighe.com

Parks N Small parks_small@fd.org, Margaret_Nason@fd.org, kim_edmonds@fd.org,
kimberly_albro@fd.org, kris_jumper@fd.org, kristin_burt@fd.org* Mark Carroll Moore mark.moore@usdoj.gov, USA-SC-ECF-Docket-M@usdoj.gov, USA-SC-ECF-
FLU@usdoj.gov, USA-SC-ECF-VW-COL@usdoj.gov, laura.edwards@usdoj.gov

William Michael Duncan wmduncan@austinrogerspa.com

* Winston D Holliday winston.holliday@usdoj.gov, USA-SC-ECF-Docket-J@usdoj.gov, USA-SC-ECF-
FLU@usdoj.gov, USA-SC-ECF-VW-COL@usdoj.gov, angela.yeadon@usdoj.gov

3:08-cr-00615-MBS-2 Notice will not be electronically mailed to:

Timothy McQueen(Terminated)
15781-171

closed - hand member
Entered in 11-8-2003

3:07-mc-00135-MBS

Judge Seymour has been - Exh. C-2?
Illegally removing
Third Party Assets and money since 2002!
Date Filed 10/19/07 Entry Number 55-1 Page 1 of 1
PRICE, ASHMORE & BEASLEY, P.A.
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Judge Seymour's final Adjudication
of the AS - the said
miscellaneous case
for 3.0 mc-135 is valid!
JOSEPH J. WATSON
- OF COUNSEL -
CASA member
why now!
Judge issued
a New Case
No. in 2010

Judge Seymour conspired with
other K.I.C.O.I.
JAMES H. PRICE, III
BEATTIE B. ASHMORE
RYAN L. BEASLEY
Licensed to practice law in South Carolina and New York

Involved Ashmore & Seymour in
taking illegal possession in
Ashmore & Seymour
was aware that state
court had jurisdiction
that federal court...

September 27, 2007
After SCAS-Ordered 9-26-07
to change and resist

VIA FACSIMILE: 803-771-8014

Hemphill P. Pride, II
1401 Gregg Street
P.O. Box 4529
Columbia, SC 29204

RE: 3HB

Dear Hemphill:

I realize that you have been speaking with Aaron Hawkins concerning my role as the Receiver in this case and your clients' duty to comply with Judge Seymour's Order. I have been informed by Special Agent Hawkins that your clients now refuse to turn over the 22 vehicles. Obviously, the Order speaks for itself and your clients are expected to comply with any and all of the terms. If your clients do not voluntarily surrender the vehicles immediately, the FBI will begin to seize the vehicles wherever located. I will bring this to the attention of Judge Seymour and ask her to rule accordingly.

In addition to the vehicles, I need the stock for the 431,000 shares in the SCCB Financial Corporation immediately.

Obviously, I must comply with the terms of Judge Seymour's Order and it is my intention to move quickly to seize any and all assets of the 3 Hebrew Boys and related entities as outlined in Judge Seymour's Order. In addition, any other assets that are traced into other entities will also be seized. Please inform your clients that their tickets to the Panthers and Falcon games have been cancelled and I am working to liquidate the tickets and skyboxes.

Agent Hawkins tells me that you have explained Judge Seymour's Order to your clients and I hope that they will cooperate accordingly.

Sincerely,
Beattie B. Ashmore

BBA/dlm

cc: Walt Tollison
✓ Aaron Hawkins
✓ AUSA Winston Holliday

* Never! had a
search warrant
Nor! No!
Indictment
in year 2007!

Judge Seymour
Conspired!
w/ Ashmore
in the
year!
2007!
NO! Civil
Decision
But
yet!
Illegally
Unethically
Removed
Personal
Property
involving
public
Business
Incest
or
Third Parties

FBI
Agent
Hawkins
who
Judge
Seymour personally
witnessed his signature
on Affidavit
dated August-2007

Exh. I

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. I, Ronald Grosse, am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), stationed in Columbia, South Carolina, and have been so employed for approximately eighteen years. I have conducted numerous investigations of various types of White Collar Crime, including the fraud commonly referred to as a Ponzi Scheme. The following information is based on my own knowledge and observations or that of other FBI Agents and law enforcement officers as stated.

Case Initiation and Scheme Outline

2. In June 2007, the FBI opened an investigation of Tony Pough, Timothy McQueen, and Joseph Brunson, doing business as the Capital Consortium Group (CCG) and the Three Hebrew Boys (3HB). The federal case arose when the South Carolina Attorney General's Office (SCAG) provided information that Pough, Brunson, and McQueen were operating a high yield investment/debt elimination scam. Likewise, the SCAG investigation flowed from a related case pursued by the Office of the North Carolina Secretary of State. CCG was operating several different investment and/or debt elimination programs crossing state lines. CCG was based out of an office in Columbia.

3. CCG's primary claim was that it could satisfy an investor's debt (mortgage, auto, credit card, signature/student loan), provide monthly income (Long-Term and Short-Term/Christmas programs), or pay college tuition, all with extraordinarily high returns from investments in the Foreign Exchange Market (FOREX). CCG claimed daily returns of between 200% and 500%.

4. CCG offered several debt elimination programs: the mortgage satisfaction, auto loan satisfaction, credit card satisfaction and signature loan satisfaction programs. Each of the programs required the victim to pay a fee, which increased with the amount of the debt. For example, the fee was \$2,625 for a mortgage between \$50,000 and \$100,000, and \$6,825 for a mortgage between \$200,000 and \$500,000. The victims were required to make their normal payments for 16 or 19 months after entering the program, at the conclusion of which CCG would pay off the remaining debt. CCG also offered a future mortgage or future auto purchase program, which operated like a high-dollar layaway program.

5. CCG also offered investment programs such as the Short-Term Program, the Long-Term Program, and the College Tuition Program. The Short-Term Program was also referred to as the Christmas Club Program. Money was invested which supposedly earned 10% per month

EXHIBIT(G)

*Prosecution
Halliday P. Admits!
Federal Court's Double
Spendy & Now Federal
US 8-17-07
alleged Taintiff
FBI Grosse*

*Admits!
the
S.C.
State!
Court's
Officials
SCAG
Documents Shows
S.C. Commissioner
&
Atty. General*

*Henry
McMaster
who
first
filed
same!
Civil
Criminal
claims
in
State
Court yet
5-21-07
up to
year 2011*

** see FBI page 6 - FBI
Admits! CCG's and 3HB*

*(3) Agents
Pough,
McQueen
and
Brunson
Did!
Invested
in the
FOREX*

*A Through
FBI
Alleged
Amount
of
Money
Invested
Varied!
with an
Different
Alleged
Affidavits*

*But shows FBI
continue claims that CCG's
agents never invested
in FOREX*

** FBI
Admits
and
Shows
the State
of North
Carolina
started
its
Never!
filed claim
of a ponzi
5 Com.
investing
CCG + 3HB
Business
and it's
Agents*

*Although
North!
Carolina
Secretary
of State
Never!
Obtained
No! Alleged
"Victim"
claimed they
were harmed
by CCG nor 3HB*

Exh. I-3a

8-17-2007
Transcript

Shows FBI Grosse - Always knew the Bank of America CCG's money sweep account

the "traders" or brokers they used or the mechanics of their investments. They enforced secrecy among their clients by having them sign non-disclosure agreements and claiming they were subject to a \$1 million fine if they disclosed the contents of the programs. I have obtained copies of blank non-disclosure agreements included in the CCG presentation containing these draconian terms.

Provided How Sweep Account worked

32. The stated investment is generally obscure enough to mask it from initial comparative scrutiny, and once payouts are made, this lessens the subsequent level of scrutiny from investors as word-of-mouth and experience trump mechanics. CCG claimed to use the FOREX in part because this is a somewhat obscure commodities markets in which its investors would have little knowledge or experience.

Received same info from said Bank of America and its subsidiary First Citizen Bank

33. The regular payment of returns induces investors to bring friends, family, and colleagues into the scheme and to put up additional funds themselves once they are convinced of its veracity. New recruits are typically found by word-of-mouth. News of the CCG programs spread quickly through the military and church community. The early investors recruited their family members and fellow soldiers and co-workers. The largest single victim occupation category was the US Army. There were a number of people employed by the US Bureau of Prisons because a couple of the IRs worked in prisons.

34. The scheme to defraud perpetrated by Tim McQueen, Tony Pough, and Joseph Brunson was destined to fail from the moment the first fee was taken in and, contrary to their representations, investor money was not placed into a FOREX account or any other account with the possibility of the promised returns of between 200% and 500% per night. They did not open a sweep account until July 2006 - a year and a half after they started business - and that account earned under 5% per year.

Not true - according to both Transcripts

Financial Analysis

35. During a search warrant executed by the South Carolina Law Enforcement Division (SLED) at the office of CCG on June 15, 2007, several computers and external storage drives were seized, along with a limited number of documents. A thumb drive was found which contained an Excel spreadsheet listing the CCG constituents, their addresses, and CCG program participation information. Their own records reflected that about 7,000 victims had invested approximately \$80 million in over 14,000 individual programs.

36. Financial information was derived from the aforementioned

Admits he personally counted 54 million dollars CCG transferred over \$67 million dollars to ECB in 2007

New! FBI Grosse Admits CCG money was deposited in a sweep account

Exh. G-1

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

IN RE:

A MATTER UNDER INVESTIGATION
BY GRAND JURY NUMBER 1
(#2007R00845)

NO. 3:07-mc-135

FILED UNDER SEAL

AFFIDAVIT

I, Ronald Grosse, am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) assigned to the Columbia, South Carolina office. I have been so employed for approximately seventeen and one half years and have had extensive experience in the investigation of white collar crime. The purpose of this affidavit is to supplement an affidavit previously submitted in this matter by SA Aaron Hawkins. That affidavit was submitted in support of a request for the issuance of a pre-indictment temporary restraining order.

The subjects of this Grand Jury investigation have created several entities, some of which have been registered with the Secretary of State's offices in South Carolina and Nevada. One of those entities is known as Capital Consortium Group, LLC (CCG).

An analysis I have done of bank records, applications and other documents submitted to CCG by clients and other records obtained from search warrants executed in both North Carolina and South Carolina revealed that Tony Pough, Joseph Brunson, and Timothy McQueen conduct business in the name of CCG.

The Securities Division of the South Carolina Attorney General's Office has obtained copies of deposit items relating to all deposits made to the Bank of America account of Brunson Outreach/Capital Consortium Group, account number 000778455204 from August 9, 2006 through May 7, 2007, when the account was closed. I have reviewed the deposit items which make up the deposits in the account. I have estimated that there were well in excess of 10,000 individual items deposited during the aforementioned time period. The items I saw in my review are primarily cashier's checks and money orders made payable to Capital Consortium Group or CCG from banks around the country.

These cashier's checks and money orders appeared to be made out in amounts consistent with the fees I know to be charged by CCG for participation in their various programs.

I have further reviewed a computerized list of the items deposited to the First Citizens Bank account of Daniel Development Group/Capital Consortium Group. These deposit items likewise are similar in amounts and form to those items deposited to the Bank of America account. They are made payable to CCG in amounts consistent with the fees they charged.

FBI Grosse
Admitted
CCG (and
several
Entities
have been
Registered
with Secretary
of State in
South
Carolina
and
Nevada.
and!
Untruthfully
Claimed
or
Admitted
The FBI

Agents Grosse & Hawkins Reviewed CCG & All CCG's entities
Bank Records, Applications and other Documents
by CCG's Clients and other Records
obtained from Search Warrants Executed
in Both North and South Carolina

Just As on the
Date May 27, 2008
FBI Grosse's
Affidavit was
Witnessed and Signed with
Signature of
Magistrate Judge Margaret
W. Hession
Prosecutor
Halliday Jr's
Admitted
File Complaint
of FBI
Grosse
Whose
First!
Filed
Signed!
Affidavit
dated 8-2-07
Claimed
The
Same!
Claimed!
and some
Indictment
Forfeiture
of
Property
and
over!
82
M. Hession
Bill of
dollars
CCG got
the spid
agents
pough,
McQueen
Brunson
see page
393
Shows Magistrate
Judge McCrory's Governing
U.S. District Judge Margaret
W. Hession served as a witness!
Also served before 14
for Prosecution before 14
CASE was assigned to Seymour
who also with reboad!
FBI Hawkins

Exh. G-2

FBI Agents Grosse & Hawkins obtained records of CCG & entities illegally without a search warrant - nor a restraining order - before June 15, 2007 - when records removed prior to June 26, 2007

Exh. G-2

My review of the primary operating accounts of CCG revealed no significant source of income other than the individual cashier's checks and money orders made payable to CCG in amounts consistent with the fees they charge clients for participation in their programs as described in SA Hawkins' affidavit.

June 15, 2007 - when records removed prior to June 26, 2007

As stated in SA Hawkins' affidavit, a review of the computerized records of CCG obtained by the South Carolina Law Enforcement Division (SLED) substantiate the fact that the overwhelming majority of the income generated by CCG is comprised of fees from clients.

FBI Admits SLED provided records of CCG from an alleged search warrant that SLED's records show SLED filed in the State Court of Richland County in Case Number 2007-CP-0003166 dated 5-21-2007 which was filed a Restraining Order

During the course of the investigation, SLED obtained records pertaining to three accounts at the South Carolina National Guard Federal Credit Union (SCNGFCU) in the names of Faith Ministries (Signature Authority - Timothy McQueen), Vision Financial (Signature Authority - Edna Pough and Tony Pough), and Wotteth Ministries (Signature Authority - Isolde Brunson and Joseph Brunson). Each of these accounts was opened on June 30, 2006.

I have analyzed the deposits and drafts from the three SCNGFCU accounts. The deposits of any significance in all three accounts are from the Bank of America account of CCG. There did not appear to be deposits of significance in these accounts other than what could be directly attributed to CCG clients through the Bank of America account.

I have reviewed the deposits and substantial checks and other debits from the Bank of America, First Citizens Bank, and SCNGFCU accounts associated with CCG, Tony Pough, Timothy McQueen, and Joseph Brunson. I have seen no significant, if any, source of income other than the fees paid by CCG clients. While I have not reviewed all of the checks and debits from the various accounts, I have reviewed enough of the debit items to be able to state that Tony Pough, Timothy McQueen, and Joseph Brunson lived off the fees from their clients and purchased motor vehicles, aircraft, real estate, and other luxury items with client money.

I have seen direct payments for the purchase of cars, the motorcoach, the airplane, and the Atlanta condominiums listed in SA Hawkins' affidavit. I have further seen payments to attorney Brian Boger which the SLED investigation has determined was for the purchase of the real estate in South Carolina listed in SA Hawkins' affidavit.

As further evidence that Tony Pough, Timothy McQueen, and Joseph Brunson have no other source of significant income, on August 1, 2007, I talked to a confidential source who is close to the three principals of CCG, has known and/or worked with them for at least a year, and is very familiar with their business. The confidential source told me that in the time she/he has known Tony Pough, Timothy McQueen, and Joseph Brunson, she/he has not known them to have a source of income other than the fees paid by to CCG by clients.

Based on my review of the evidence obtained thus far, I have determined that the money obtained by Tony Pough, Joseph Brunson, and Timothy McQueen through CCG was taken by fraud and that it was deposited in bank accounts controlled by them. My analysis of the evidence

But CCG & other business entities and paid CCG's agents records money & properties or aka source of significant income... none since May 21, 2007 and FBI alleged confidential source reported their findings on August 1, 2007

NC Dec 7 State; Nor SLED - ever! Received a search warrant Nov 15, 2007. App. in warrant before June 15, 2007.

Exh. G-3-a

~~Approved Attorney Admits to ~~being~~ to represent~~
~~Agents Pough, McQueen, Brunson, and Timothy McQueen~~
 (3) ~~Home~~ Agents Pough, McQueen, Brunson, and Timothy McQueen used client fees to live on and purchase substantial assets for their own personal use. ~~It is my belief that any other source of income significant enough to sustain their lifestyles and purchase the millions of dollars in assets identified by SA Hawkins would have been glaringly noticeable in the bank records.~~

has uncovered no source of income other than the fees paid by participants in the bogus programs promulgated by CCG. No other conclusion can be drawn except that Tony Pough, Joseph Brunson, and Timothy McQueen used client fees to live on and purchase substantial assets for their own personal use. It is my belief that any other source of income significant enough to sustain their lifestyles and purchase the millions of dollars in assets identified by SA Hawkins would have been glaringly noticeable in the bank records.

the
June 15,
2007
and
Shane
3rd
2008
that
Allegedly
had
all
three
paid
offends,
Allegedly
with
set
Bonds
amounts
which
they
were
released
on
June 16,
2008



Ronald Grosse, Special Agent, FBI

Sworn to and subscribed before me
this 2nd day of August, 2007.

Margaret B. Seymour
MARGARET B. SEYMOUR, U.S. DISTRICT JUDGE

And show the actions
PM said in U.S. District
Judge M.B. Seymour
continued acting as a personal
interested party - By signing
a Notary - or witness the
Prosecution's witness Affidavit, 2007 and
The DATES - August 1st, 2007 - on FBI Mose - Although!
on Aug 2nd 2007 - on FBI Mose - Although!
Not the selected
acting Judge on
the date of 2007
Aug. 1st, 2007
When M. B.
Seymour was
Notary for
FBI and
Signed and approved and
Served as a Judge on June 15, 2008
wanted subpoena