

SOUTH CAROLINA LAW ENFORCEMENT DIVISION/ "SLED"

Pages 1 of 2

Attn: Major Paul Grant¹ 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)***

Exh 2

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

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 G

Handwritten marks: asterisks, question marks, and arrows on the left margin.

Main body of the transcript with handwritten annotations: circles around words, arrows pointing to specific words, and scribbles.

EX 4.4
STATE-5LED investigation

WATSON and TWO other Agents "SEEK" the "SERVICE" of CCG and on 6-15-2007

SCAS for the State! Ad miss! Arrests of Pough, Brunson and McQueen 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?

4 A Yes, sir, it is.

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?

Said Agents - on 6-15-2007 the same day of the 5LED arrests on Pough, Brunson and started: 5LED's investigation on 6-15-2007 - yet!! ongoing since! 2007-2001-

Arrested agents by an alleged Grand Jury ARREST WATSON by Brit! No! Records where Grand Jury Ever met on Date! June 15, 2007?

Also false or forged Arrest documents searched by 5LED!

Exh. 5

SLED Watson agent
Admits
Documents seized
from thumb drives
turned over to
FBI agents Grosse
Hawkins
At EL
after the date
6-15-07

SLED Admits!
Computer Center illegally
Thumbs + Documents without!

1 and the other one is a Memorex.

2 Q Okay. At some point did the Computer Crime Center

3 process those thumb drives and provide you with copies of

4 some documents that were seized therefrom that was of

5 assistance to you and later that you and other agents from

6 SLED turned over to Special Agents Grosse and Hawkins?

7 A Yes, sir, he did.

8 MR. MOORE: Your Honor, at this point I move 4A, 4B

9 and 4C into evidence.

10 THE COURT: Any objection?

11 MR. LANG: No objection, Your Honor.

12 THE COURT: It's admitted.

13 (WHEREUPON, Government's Exhibits 4a, 4b, 4c were

14 admitted into evidence.)

15 MR. MOORE: Thank you, Your Honor. May I approach

16 and get those back and give them to Miss Deal?

17 THE COURT: You may.

18 BY MR. MOORE: Watson never mentioned a search warrant

19 Q Now, you also mentioned that you executed a search

20 warrant.

21 A Yes, sir, that's correct.

22 Q On what day did you execute a search warrant and where

23 was the search warrant executed?

24 A The search warrant was executed at 1529 Horseshoe Circle

25 which was the business address for the Capital Consortium

red and
52
proceeded!
Search warrant that were given 4/07 FBI agents Grosse + Hawkins

Admits to
- give said
thumb drive
directly to
Judge M.O.
Seymour's
Deal!
and
alleged
SLED
issue
an
alleg
Search
Warrant
filed by prosecutor

Admits to
alleged search
warrant
executed
during the
during the
warrant
Hawkins
Hawkins
CCC
Business
Hawkins
AT
Bled
on
Horseshoe
circle

Exh #57

Acknowledges Federal Court and State Court - Both participation with the Richland County Ashmore - since in the year 2007 - claiming the same properties against

Admits to Double Jeopardy and Unethical Practice CLOSED

ORDERED DISCLOSURE REGARDING ILLEGAL RECEIVERSHIP OF FINANCIAL ASSETS RESTRAINED BY SEYMOUR IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

Federal U.S. Asst. Atty. Holliday Jr. shown Always participation of the State Court - SCAG office of Henry McMASTER

Involvement same named w. t. reaser named by defendant's in their Interruption 1-19-2012

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

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.

which shows! Both! The State Court and Federal Court was claiming the same properties and money + Invaluing 3-HBS-CCG Business - 14 thousand \$ - Depositors since in

* 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" and Judge M. B. Seymour's Affected Order - Dated 8-20-2007 - Shows Federal Judge Seymour - Ordered to participate with State Court...

Respectfully submitted, REGINALD I. LLOYD UNITED STATES ATTORNEY 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

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 U.S. Atty. Federal 21 USC - 853(e)(2)

Shows
Federal Judge Seymour always
checked jurisdiction over
civil and criminal
case matters - which AG's!
involved! the said
third parties - pursuant
w/ prosecution's fees
21 USC 853(c)(2)
and (d)(1)

EXH-18-A

This AG's Letter 12/7/10
Conflict of Interest
AG's Requested - Repeated
Claims - 5-12-2011



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
12/7/10

* This Letter and Order of Dismissal Confirms! The Federal Court Judge Seymour Always Knew she Lacked Jurisdiction to have filed the Federal Restraining Order when On Aug. 1st 2007 - [unclear] State Court [unclear] have Jurisdiction as of Dec. 1st 2010 - by Judge George C. James Jr. state court

* Shows Federal Court Jurisdiction in Motion for Restraining Order granted by Judge Seymour on 8/1/07 pursuant to 21 USC 853(c)(2) see attached Exh. 17-C

Richland County Judges Disqualified themselves since year 2007... 5-12-11 2 pgs S.C. Stat. Court on C.C.

EKHA

PRE-INDICTMENT RESTRAINING ORDER AFFIDAVIT

Federal FBI Agents Always Admitted

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:

SCAG provided FBI and Federal officials with information on CCG & 3HB's Business and paid Business Agents Pough, McQueen and Brunson

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).

Information on CCG & 3HB's Business and paid Business Agents Pough, McQueen and Brunson

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.

Residing in SCAG's Bank Accounts at BOA With Out!!

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

any! Search! Warranted before!! the date! June 1 or June 15, 2007 when SCAS Admits it obtaining an Alleged Search Warrant Involving Law Enforcement, SLED Agent Watson's also Date of PARLET Reg agents due to

Exh. AA04

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

Exh. I

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

*Prosecution
Halliday, P. Admits!
Federal Court's Double
Spendy & Only Federal
US 07 8-17-07
alleged Plaintiff
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
9-6-07
5-21-07
2 up to
year 2011*

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

*FBI Admits and Shows the State of North Carolina started its Newer! Filed claim of a ponzi of 5 Com. involving CCG + 3 HB's Business agents
Although North Carolina Secretary of State never obtained No! Alleged "Victim" claimed they (in the Military Army) were harmed by CCG nor 3HB*

*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
9-6-07
5-21-07
2 up to
year 2011
* see FBI page 6 - FBI Admits! CCG's and 3HB's
(3) agents Pough, McQueen and Brunson Did! Invested in the FOREX
A Through FBI Alleged amount of Money Invested varied! with an i Different! Affidavits.
But shows FBI continue claims that CCG's agents never invested in FOREX*

Exh. I-3a

*8-17-2007
Court
Transcript*

*Shows FBI Grosse - Always
Knew the Bank of America CCG's 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.

and provided how sweep acct 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 whom FBI Grosse admits he personally counted 541,000 victims

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 transcript

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

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

Admits he personally counted 541,000 victims 77 CCG transferred over \$67 million Dollars to FBI - 1/2007

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's 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 Signed with
Signature of
Magistrate Substantive
Witness
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
Forfeiture
Property
over!
82
M. III msc
Billions
of
CCG's
The Spid
agents
Pough,
McQueen
Brunson
see page
393
Shows Magistrate
Judge McCrory's Governing
U.S. District Judge Margaret
Seymour Also served as a witness!
for Prosecution before 14 hrs
CASE WHO was signed by Seymour
who also was witness!
FBI Hawkins*

Exh. G-2

FBI Agents Grosse & Hawkins obtained records of CCG & entities illegally without a search warrant - nor a Restrain Order. Before the

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 search May 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 SCAG provided records of CCG - from an alleged search warrant that SCAG's records show search filed in the state court of Richland County in case number 2007-CP-0003166 dated 5-21-2007

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

which was admitted and filed a Restrain Order

On August 1, 2007, and SCAG, Nor NC Dec 7 State, nor SLED - ever! Received a search warrant Nov 15, 2007. App. Int. Warrant before June 15, 2007.

Exh. G-3-a

~~AA~~ appointed Attorney Admits to ~~Field~~ to represent
Homeless Agents Pough, McQueen, ~~Field~~ in six - regarding
their false Affidavits and ~~Field~~ and False Affidavits

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.

on June 15, 2007 and Shane 3rd 2008


Ronald Grosse, Special Agent, FBI

that allegedly had all three said Affidavits, Affidavits with set Bonds amounts which they were released on June 16, 2008

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

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

And show to the Acting 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, on 2007 and on the DATES - August 1st, 2007 - on FBI M.B. Seymour Notary and 2007 - on FBI M.B. Seymour Notary and

Not the selected Acting Judge on the date of 2007 when M.B. Seymour was Notary for FBI and signed on approved and served as a Judge on June 15, 2007