

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) FILED UNDER SEAL
BY GRAND JURY NUMBER 1)
(#2007R00845))

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.

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.

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.

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.

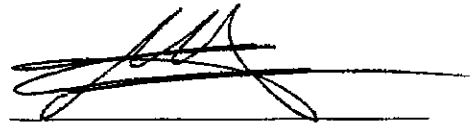
I have reviewed the deposits and substantial checks and other debits from the Bank of America, First Citizens Bank, and SCNGFCU accounts associated with CCG, Tony Pough, Timothy McQueen, and Joseph Brunson. I have seen no significant, if any, source of income other than the fees paid by CCG clients. 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.

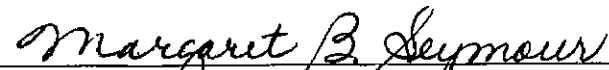
Based on my review of the evidence obtained thus far, I have determined that the money obtained by Tony Pough, Joseph Brunson, and Timothy McQueen through CCG was taken by fraud and that it was deposited in bank accounts controlled by them. My analysis of the evidence

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.



Ronald Grosse, Special Agent, FBI

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


MARGARET B. SEYMOUR, U.S. DISTRICT JUDGE