

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))

PRE-INDICTMENT RESTRAINING ORDER

This matter having come before the Court following a motion of the United States of America for entry of a Pre-Indictment Restraining Order pursuant to Title 18, United States Code, Section 982(b)(1), incorporating Title 21, United States Code, Section 853(e)(2), which provides district courts with jurisdiction to enter pre-indictment restraining orders and to take such other action in connection with any property or other interest subject to forfeiture to ensure its availability for forfeiture, and pursuant to this Court's inherent power to make orders necessary and proper to the orderly carrying on of litigation brought within the Court's jurisdiction;

The Court hereby finds that the United States has established that there is probable cause that it will prevail on the issue of forfeiture and that failure to enter this Order will result in the property being dissipated, transferred, removed from the jurisdiction of this Court or otherwise jeopardize its availability for forfeiture to the United States, and that the need to preserve the availability of the property through the entry of this order outweighs the hardship on the parties against whom the order is entered.

IT IS THEREFORE ORDERED:

Tony Pough, Joseph Brunson, and Timothy McQueen, doing business under the following names: Three Hebrew Boys, LLC; Capital Consortium Group, LLC; Brunson Outreach; Daniel Development Group, LLC; Wotteth Outreach Ministries; Vision Financial Service; Faith Ministries; Warrior Express; TMS Family Trust; Purpose Driven, LLC; Tri-Warrior Transit, LLC; Tri-Transit Logistics, LLC; KMF, Inc.; and Vision Outreach, and any of their agents, servants, employees, attorneys, family members, and those persons in active concert or participation with them, and anyone and any institution holding property, both real or personal (including bank and/or brokerage accounts) for them, are hereby enjoined from selling, transferring, assigning, encumbering, spending or otherwise attempting or completing any action that would affect or diminish the marketability or value of property described in Exhibit A, without prior approval of this court and prior notice or opportunity for the United States to be heard. All those persons who may be entitled to possession of any portion of the property restrained herein, whether by virtue of a claim of title, security interest, lien, judgment, contract, or any other legal or equitable basis are hereby

ENJOINED AND RESTRAINED from directly or indirectly selling, transferring, attaching, assigning, pledging, distributing, giving away, encumbering, destroying, dissipating, wasting, disposing of in any manner or otherwise participating in the disposal of or removal from the jurisdiction of this Court of all or part of their interest, direct or indirect, in the properties identified in Exhibit A without prior approval of the Court upon notice to the United States and an opportunity for the United States to be heard, except as specified

in this Order.

IT IS FURTHER ORDERED that if any of the property described in Exhibit A has been transferred or disposed of by any means, Tony Pough, Joseph Brunson, and Timothy McQueen, doing business under the following names: Three Hebrew Boys, LLC; Capital Consortium Group, LLC; Brunson Outreach; Daniel Development Group, LLC; Wotteth Outreach Ministries; Vision Financial Service; Faith Ministries; Warrior Express; TMS Family Trust; Purpose Driven, LLC; Tri-Warrior Transit, LLC; Tri-Transit Logistics, LLC; KMF, Inc.; and Vision Outreach, and any of their agents, servants, employees, attorneys, family members and those persons in active concert or participation with them, and anyone and any institution holding property, both real or personal (including bank and/or brokerage accounts) for them, shall account to the Court for the disposition and location of the property; Further, this Order applies with equal force and effect to restrain the transfer or disposition of the proceeds from said property.

IT IS FURTHER ORDERED that if the real property described in Exhibit A is subject to mortgage(s), Tony Pough, Joseph Brunson, and Timothy McQueen, doing business under the following names: Three Hebrew Boys, LLC; Capital Consortium Group, LLC; Brunson Outreach; Daniel Development Group, LLC; Wotteth Outreach Ministries; Vision Financial Service; Faith Ministries; Warrior Express; TMS Family Trust; Purpose Driven, LLC; Tri-Warrior Transit, LLC; Tri-Transit Logistics, LLC; KMF, Inc.; and Vision Outreach, and any of their agents, servants, employees, attorneys, family members and those

persons in active concert or participation with them, and anyone and any institution holding property, both real or personal (including bank and/or brokerage accounts) for them, is directed to pay in a timely manner any mortgage payments to keep mortgage(s) current; ensure that all real property taxes are paid on time and do not become delinquent; maintain fire, flood and hazard insurance on the properties, maintain the yards and any landscaping in their current condition and not allow trash or other debris to accumulate; and shall take other necessary to protect the described properties from damage or deterioration.

All financial institutions holding any liens, mortgages or other security interests in the real property identified in Exhibit A are hereby directed to prevent and otherwise are enjoined from foreclosing, encumbering, transferring, conveying, diminishing or disposing of any such property. Such financial institutions shall continue to receive and credit monies received for applicable mortgage payments, taxes and insurance for the real properties identified in Exhibit A pursuant to the terms of such mortgage(s). Financial institutions holding mortgages or other liens against the real properties identified in Exhibit A shall immediately inform the Government agents who serve them with copies of this Order of each outstanding account balance at the time of receiving notice of this Order and thereafter at the request of such agents during the pendency of this Order. Such financial institutions shall also promptly notify the United States Attorney if mortgage payments, taxes and insurance are not paid in a timely manner in accordance with the terms of applicable mortgage(s) and this Order.

The United States shall take whatever reasonable measures are deemed necessary to post notice of this restraining order on the real properties identified in Exhibit A and to execute this restraining order.

IT IS FURTHER ORDERED that the Court will appoint a receiver in this case to assist the parties in the identification and disposition of assets. The receiver to be appointed will be determined at a later date. The parties are ordered to provide such information as the receiver requires to fulfill the receiver's designated obligations, once the receiver is appointed.

This Order shall be filed in the counties where affected real properties are located.

DATED this 2nd day of August, 2007.

/s/ Margaret B. Seymour

UNITED STATES DISTRICT JUDGE

Columbia, South Carolina

EXHIBIT A**AUTOMOBILES**

<u>Vehicle</u>	<u>VIN</u>	<u>Owner(s)</u>
2007 Dodge Ram Truck	1D7HA18247S179403	3 Hebrew Boys
2007 Lexus LS 460L	JTHGL46F675009418	3 Hebrew Boys
2007 Dodge Van - Sprinter	WD0PE746X75168143	3 Hebrew Boys
2007 Dodge Ram Truck	1D7HA18217S178497	3 Hebrew Boys
2007 Dodge Ram Laramie Truck	3D7KR19DX7G718855	3 Hebrew Boys
2007 Dodge Van - Sprinter	WD0PE746875137490	3 Hebrew Boys
2007 Mercedes SL600R	WDBSK77F47F118631	3 Hebrew Boys
2007 Mercedes Roadster AMG	WDBSK79FX7F126973	3 Hebrew Boys
2005 GMC TC15753	1GTEC19T95Z318279	Brunson, Isolde/ Brunson, Joseph
2006 Cadillac 1G6K	1G6KD57Y76U236316	Brunson, Joseph
2005 Mercedes SL500	WDBSK75F85F093717	Brunson, Joseph
2006 Prevost Motorcoach	2PCY3349361028988	Daniel Development Group
2007 Mercedes SLK 280	WDBWK54F77F15001	McQueen, Lisa Wright 5
2007 Lexus LS460L	JTHGL46F875014023	McQueen, Lisa Wright
2006 Mercedes CLS500C	WDDDJ75X46A073944	McQueen, Timothy
2006 Lexus GS	JTHBN96S065014868	McQueen, Timothy
2007 Dodge Charger	2B3KA53H97H605677	McQueen, Timothy
2006 GMC Envoy	1GKES66MX66163505	Pough, Tony
2006 SAAB 95	YS3ED49G363513728	Pough, Tony
2006 Ford E456	1FDXE45P06DB20732	Purpose Driven Limousine Service
2006 Chrysler 300 Touring LXL P48	2C3KA53G26H539904	Purpose Driven Limousine Service
2007 Chrysler 300 Touring LXL P48	2C3KA53G07H625360	Purpose Driven Limousine Service

AIRPLANE

<u>Aircraft</u>	<u>Serial #/U.S. Regist</u>	<u>Owner</u>
Aerospace Gulfstream G11B	004 N36RR	Capital Consortium Group

REAL PROPERTY

<u>Real Property Location</u>	<u>City</u>	<u>State</u>	<u>Owner</u>
3445 Stratford Road, Unit 2707	Atlanta	GA	Tim McQueen and Leslie McQueen
3445 Stratford Road, Unit 3304	Atlanta	GA	Joseph Brunson, Faith Ministries, Timothy McQueen
3445 Stratford Road, Unit 2304	Atlanta	GA	Vision Outreach, Tony Pough
1529 Horseshoe Drive	Columbia	SC	Daniel Development Group
6182 North Main Street	Columbia	SC	Daniel Development Group
305 Ashtree Road	Columbia	SC	Daniel Development Group
44 Ravenglass Way	Blythewood	SC	Tim McQueen
300 Garvey Circle	Columbia	SC	Daniel Development Group
301 Garvey Circle	Columbia	SC	Wotteth Outreach Ministries
304 Garvey Circle	Columbia	SC	Daniel Development Group
320 Garvey Circle	Columbia	SC	Daniel Development Group
332 Garvey Circle	Columbia	SC	Daniel Development Group
344 Garvey Circle	Columbia	SC	Daniel Development Group
213 Hastings Point	Columbia	SC	Daniel Development Group
135 Fore Avenue	Columbia	SC	Wotteth Outreach Ministries
128 Wynette Way	Columbia	SC	Wotteth Outreach Ministries
109 Aubrey Street	Columbia	SC	Wotteth Outreach Ministries
Lot 8, Block K-1, Longcreek Plantation	Blythewood	SC	Daniel Development Group