

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JENNIFER ECKLUND, RECEIVER,

Plaintiff,

v.

ROBERT AND SANDRA BAILEY, et al.

Defendants.

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Ancillary Civil Action No. 4:18-cv-359

RECEIVER’S EXPERT DESIGNATIONS

Pursuant to the Court’s Scheduling Order [Dkt. No. 45] and in accordance with the Federal Rules of Civil Procedure, Plaintiff Jennifer Ecklund, in her capacity as the Court-appointed Receiver (the “**Receiver**”) for Defendants Thurman P. Bryant, III (“**Bryant**”) and Bryant United Capital Funding, Inc. (“**BUCF**”) (Bryant and BUCF, collectively, the “**Bryant Defendants**”) and Defendant Arthur F. Wammel (“**Wammel**”), Defendant Wammel Group, LLC (the “**Wammel Group**”), and Wammel Group Holdings Partnership (“**WGHP**”) (together Wammel, Wammel Group, and WGHP, the “**Wammel Defendants**”) receivership estates (together, the “**Receivership Estate**” or the “**Receivership**”), by and through undersigned counsel, hereby submits the following expert witness designations (the “**Expert Designations**”):

1. Defendants’ Experts

The Receiver reserves the right to elicit expert opinion testimony, by way of cross examination, from any expert designated by Defendants to the extent permitted under the Federal Rules of Civil Procedure and to the extent such individual is qualified to testify as an expert.

2. Brandi N. Kleinman

Veritas Advisory Group, Inc.

1601 Elm Street, Suite 3600

Dallas, Texas 75201

Ms. Kleinman is a Vice President of Veritas Advisory Group, Inc. Ms. Kleinman has extensive experience in forensic accounting. Ms. Kleinman is a Certified Public Accountant and holds the designation of Certified in Financial Forensics.

Ms. Kleinman has expert knowledge about forensic accounting and in identifying and analyzing material and/or questionable transactions as well as fraudulent transfers. Ms. Kleinman can testify about the transfers made from the Bryant Defendants and the Wammel Defendants to the Defendants as well as transfers made from the Defendants to the Bryant Defendants and the Wammel Defendants. Ms. Kleinman's report is attached hereto as **Exhibit A**.

The Receiver reserves the right to possibly call expert witnesses designated by any other party to these cases and reserves the right to call any such expert either by direct testimony or cross-examination. The Receiver reserves the right to elicit fact and opinion testimony from fact witnesses called by any of the parties to this case, including testimony pursuant to Federal Rule of Evidence 701. The Receiver reserves the right to un-designate any of the above-named persons and utilize such persons in a consulting-only capacity. The Receiver reserves the right to supplement expert designations under Federal Rule of Civil Procedure 26(e). The Receiver reserves the right to call rebuttal or impeachment witnesses whose testimony could not have been reasonably anticipated.

DATED: January 14, 2019.

Respectfully submitted,

By: /s/ Timothy E. Hudson

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COUNSEL TO RECEIVER

CERTIFICATE OF SERVICE

On January 14, 2019, I electronically submitted the foregoing document to the Clerk of the Court for the United States District Court for the Eastern District of Texas using the electronic case filing system of the Court.

/s/ Timothy E. Hudson
Timothy E. Hudson



Jennifer Ecklund, Receiver

v.

Robert and Sandra Bailey, et al.

Expert Report
Prepared by
Veritas Advisory Group, Inc.

A handwritten signature in blue ink, reading "Brandi N. Kleinman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brandi N. Kleinman

January 14, 2019



TABLE OF CONTENTS

I.	Introduction.....	1
II.	Qualifications	2
III.	Background	3
IV.	Veritas Processes and Procedures	4
V.	BUCF Net Winners.....	4
VI.	Wammel Group Net Winners	5
VII.	List of Documents Reviewed and Considered	7
VIII.	Qualifications of Brandi Kleinman	8
IX.	Publications.....	10
X.	Testimony Experience of Brandi Kleinman	11
XI.	Charges for Services	12



I. Introduction

Veritas Advisory Group, Inc. (“Veritas”) was retained by Court-appointed Receiver, Jennifer Ecklund of Thompson & Knight (“Receiver”), to perform forensic accounting services relating to Thurman “Trey” P. Bryant III (“Bryant”), Bryant United Capital Funding, Inc. (“BUCF”), Bryant Financial (“BF”), Bryant United Holdings (“BUH”) and his related entities Proliquidation Services, LLC (“Proliquidation Services”), and Pro B Entertainment Group, LLC (“Pro B”) (“together the **Bryant Defendants**”). Veritas also reviewed and analyzed financial information and transactions relating to Arthur F. Wammel (“Wammel”), Wammel Group, LLC (“Wammel Group”), and his related entities WSG Equity Partners, LLC (“WSG”), WH Holdings, LLC (“WH”), Summus Investment Holdings, LLC (“Summus”), and Global Motorcars of Houston (“Global Motorcars”) (“together the **Wammel Defendants**”). As part of Veritas’s analysis, we calculated the returns each BUCF and Wammel Group investor received compared to the principal amount invested. This Report identifies certain investors with returns in excess of the principal invested amount (“Net Winners.”)¹ It is our understanding that the Receiver is seeking a claw back of the returns in excess of the principal investment amount.

Veritas’s work is ongoing, and should additional information become available, Veritas reserves the right to amend, revise, or supplement this Report as necessary. This Report is prepared for the purpose of evaluating issues related to the matter referenced above and cannot be used in any manner or for any other purpose without Veritas’s prior written consent. A listing of documents and other information Veritas reviewed and considered in preparing this Report is contained in **Section VII**. My curriculum vitae, publications, list of recent expert testimony, and charges in connection with this matter are contained in **Sections VIII through XI** of this Report.

¹ Veritas has reviewed documentation and is aware of all transfers coming in and out of the Bryant and Wammel accounts. If necessary, Veritas could provide a breakdown of all such transfers. However, at this time, the focus of this Report is limited to transfers related to the remaining defendants in *Jennifer Ecklund, Receiver v. Robert and Sandra Bailey, et al.*, Ancillary Civil Action No. 4:18-cv-00359.



The Attachments are an integral part of this Report and contain additional detail and supplemental information related to Veritas's work in this matter. **Attachments A through B.1** should be read in conjunction with this Report.

II. Qualifications

I am a Vice President of Veritas Advisory Group, Inc., a consulting firm that provides forensic accounting and litigation support services to domestic and international businesses, public entities, and governmental agencies. I am a Certified Public Accountant ("CPA") licensed in the State of Texas and have been since 2006. I also hold the designation of Certified in Financial Forensics ("CFF"). The CFF credential is granted by the American Institute of Certified Public Accountants ("AICPA") to CPAs who have sufficient education and over 1,000 hours of experience in the field of forensic accounting. CFF holders are required to obtain 75 hours of relevant continuing education every 5 years. Additionally, I am a member of the AICPA.

I graduated from the University of Texas at Austin in 2000 with a Bachelor of Business Administration with an emphasis in finance. From July 2000 to December 2002, I held consulting positions with Navigant Consulting, Inc. where I managed teams of professionals providing forensic accounting and litigation support services. I have over 18 years of experience consulting with clients on a variety of managerial and dispute resolution matters. Additionally, I am frequently retained as a speaker or panelist to discuss the topic of damages and investigative accounting techniques.

Over the course of my career, I have provided financial and economic damage evaluations of complex commercial litigation disputes. My services frequently require me to analyze damages and perform forensic accounting for the following types of disputes: breach of contract disputes, infringement of intellectual property rights, breach of fiduciary duty, business interruption, bankruptcy, securities fraud, insurance disputes, and construction claims, among others. In the course of my experience, I have worked on numerous engagements that involve developing, analyzing, and defending against complex financial, statistical, and economic models in business litigation matters. In addition, I have conducted numerous fraud and forensic investigations.



III. Background

The Bryant Defendants engaged in a Ponzi scheme and used BUCF to raise more than \$22 million from approximately 100 investors starting in 2010 to 2017. Based on the work performed to date, Veritas identified that investor funds were, in most instances, deposited into the Bryant United Capital Funding accounts and then disbursed as directed by Defendant Thurman P. Bryant, III. As part of the Bryant Defendants' Ponzi scheme, BUCF transferred its investors' funds to the Wammel Group—a limited liability company wholly owned and operated by Wammel—which in turn invested BUCF investor funds in high-risk options trading. The Wammel Defendants, by and through Wammel, also raised funds independent of BUCF funds, which Wammel used in the same way.

Based on the findings of my investigations, more than \$22 million was raised from BUCF investors during the course of the scheme, including approximately \$1.4 million raised since January 2017 alone. Notably, of that \$22 million, more than \$17.8 million was transferred to the Wammel Group, Carlos Goodspeed, and Thurman “Sonny” Bryant, Jr., and approximately \$4.8 million was misappropriated by Bryant to fund his personal living expenses. None was invested as promised in the agreements signed by investors. In addition, the Wammel Defendants have raised approximately \$44.7 million dollars from 16 investors, primarily through limited partnership agreements.

Veritas has identified that Net Winners received approximately \$980,000 from the Bryant Defendants and \$340,000 from the Wammel Defendants in excess of the principal investment. This Report describes the processes and procedures employed by Veritas to identify Net Winners and the amounts earned at the expense of other defrauded investors of BUCF and Wammel Group.



IV. Veritas Processes and Procedures

I and other Veritas employees under my supervision (collectively “Veritas”) reviewed thousands of pages of information provided to me by the Receiver to arrive at the statements, conclusions, analyses, and opinions contained in this Report, including: (a) bank statements from financial institutions such as Wells Fargo, JP Morgan Chase, USAA Bank, etc., (b) copies of incoming and outgoing checks, deposit and withdrawal slips, and cashier’s checks; (c) Wells Fargo Direct Pay statements and wire transfer transaction documents; (d) investment account statements from institutions such as TD Ameritrade, OptionsXpress, etc.; and (e) investor documents such as the limited partnership agreements and investor monthly statements provided by Bryant and Wammel to their investors. See **Section VII** for a complete listing of documents reviewed and considered by the Veritas.

Veritas compiled the data from the financial documents and bank statements and prepared an investor database that shows all of the BUCF and Wammel Group investors, details for each investor’s principal amount invested, and a list of the payments (returns) received by each investor from BUCF and Wammel Group. Veritas utilized the compiled data to compare each investor’s principal amount contributed and the returns received throughout the duration of the investment. Each Net Winner received payouts in excess of the principal investment. The Receiver is seeking a claw back of the amounts received by investors in excess of the principal investment.

V. BUCF Net Winners

Veritas identified 278 transactions totaling \$983,818 involving BUCF Net Winners during the life of the BUCF investment operation. A summary of BUCF Net Winners is shown in **Table 1**:

**Table 1: Summary of Net Winners and Amounts for BUCF**

Net Winner	Principal Transactions Made to BUCF	Number of Return Payouts to Net Winner	Net Principal Amount Invested to BUCF	Investment Return Amount to Net Winner [1]	Net Amount Received Beyond Invested Principal
Roland and Holly Maldonado	4	70	(\$259,000)	\$994,900	\$735,900
Hossein Seddighi	1	66	(70,000)	179,900	109,900
Kenneth and Chelsea Hughes [2]	12	67	(750,000)	837,268	87,268
Teresa Ezell [3]	2	12	0	30,000	30,000
Blair Knapp	6	38	(40,000)	60,750	20,750
	25	253	(\$1,119,000)	\$2,102,818	\$983,818

Sources:

- [a] Bryant United Capital Funding, Inc. Wells Fargo Bank statements and corresponding checks, deposits, withdrawals, and wire transfers for account **Redacted** 692 from July 1, 2011 to October 31, 2017
- [b] Bryant United Capital Funding, Inc. Wells Fargo Bank Direct Pay Statements for account **Redacted** 692 from January 1, 2012 to April 5, 2017
- [c] Bryant United Holdings Inc. JPMorgan Chase Bank statements and corresponding checks, deposits, withdrawals, and wire transfers for account **Redacted** 324 from January 1, 2010 to October 4, 2011

Notes:

- [1] February monthly return payouts are included in the calculation for amounts received by Net Winners. These February payouts do not appear on the BUCF Wells Fargo Direct Pay statement for each investor, but the combined withdrawal transaction is shown on BUCF's Wells Fargo February monthly bank statement. Veritas determined the February monthly payout remitted to each investor by assuming it was the same as their March 2017 payout.
- [2] Bryant remitted the Hughes monthly payouts in two forms: cash sent to the Hughes Wells Fargo account and through the \$743.69 monthly repayment of a Regions Bank loan from September 2011 to August 2016. The combination of these payments are shown in Exhibit A.1.
- [3] Tereza Ezell made an initial principal investment on February 6, 2015 for \$100,000. She later withdrew her entire principal investment on April 1, 2016. As a result, her net investment is zero.

For additional details related to the amounts for BUCF Net Winners, see **Attachment A and A.1**.

VI. Wammel Group Net Winners

Veritas identified 121 transactions totaling \$340,081 involving Wammel Group Net Winners. A summary of the Wammel Group Net Winners is shown in **Table 2**:



Table 2: Summary of Net Winners and Amounts for Wammel Group

Net Winner	Principal Transactions Made to Wammel Group	Number of Return Payouts to Net Winner	Net Principal Amount Invested to Wammel Group	Investment Return Amount to Net Winner	Net Amount Received Beyond Invested Principal
Robert and Sandra Bailey	1	61	(\$200,000)	\$377,315	\$177,315
Stephen Garrett [1]	10	49	(646,000)	808,766	162,766
	11	110	(\$846,000)	\$1,186,081	\$340,081

Sources:

- [a] Wammel Group, LLC Wells Fargo Bank statements and corresponding checks, deposits, withdrawals, and wire transfers for account **Redacted** 950 from January 1, 2010 to August 31, 2017
- [b] Wammel Group, LLC Wells Fargo Bank Direct Pay Statements for account **Redacted** 950 from January 1, 2012 to April 5, 2017
- [c] Arthur Wammel Wells Fargo Bank statements and corresponding checks, deposits, withdrawals, and wire transfers for account **Redacted** 284 from April 15, 2010 to September 15, 2017
- [d] Checks from Stephen Garret paid to Wammel Group from October 5, 2015 to July 19, 2017
- [e] Interview of Stephen Garret on October 5, 2017 Notes

Note:

- [1] According to the Stephen Garret interview notes, Garrett and Wammel made multiple transfers for a number of purposes. For the purposes of this calculation, Veritas included only transfers related to Garrett's investment in Wammel Group LLC.

For additional details related to the amounts for Wammel Group Net Winners, see **Attachments B and B.1**.



VII. List of Documents Reviewed and Considered

Date	Description
	<i>Pleadings and Petitions</i>
5/15/17	Complaint
5/15/17	Order Appointing Receiver
	Receiver's Complaint Against Certain Transferees
	<i>Investor Documents</i>
	Investor Partnership Agreements and Investor Monthly Statements
10/5/17	Notes from Interview with Stephen Garrett
	<i>Bryant Financial Documents, etc.</i>
7/12/11 – 10/31/17	BUCF Wells Fargo Account Redacted 692 statements and documents
1/1/10 – 10/4/11	Bryant United Holdings Inc. JPMorgan Chase Account Redacted 324 statements and documents
2/2/12 – 3/2/17	Bryant USAA Federal Savings Bank Account Redacted 495 statements and documents
5/1/17 – 7/31/17	Bryant Legacy Texas Account Redacted 945 statements and documents
5/1/17 – 7/31/17	Pro B Entertainment Group, LLC Account Redacted 377 statements and documents
2/6/14 – 6/30/17	Proliquidation Services, LLC JPMorgan Chase Account Redacted 551 statements and documents
1/14/17 – 5/31/17	JPM Global Source, LLC Capital One Bank Account Redacted 662 statements and documents
	<i>Wammel Financial Documents, etc.</i>
4/1/10 – 8/31/17	Wammel Group Wells Fargo Account Redacted 968 statements and documents
1/1/10 – 8/31/17	Wammel Group Wells Fargo Account Redacted 950 statements and documents
4/15/10 – 9/15/17	Arthur Wammel Wells Fargo Account Redacted 284 statements and documents
4/1/10 – 9/15/17	Arthur Wammel Wells Fargo Account Redacted 284 statements and documents
4/2/10 – 9/22/17	Arthur Wammel and Samantha Wammel Wells Fargo Account Redacted 457 statements and documents
3/20/10 – 9/22/17	Arthur Wammel and Samantha Wammel Wells Fargo Account Redacted 047 statements and documents
6/10/11 – 4/30/15	WSG Equity Partners LLC Wells Fargo Account Redacted 170 statements and documents
10/18/11 – 7/31/14	WH Holdings, LLC Wells Fargo Account Redacted 489 statements and documents
7/15/15 – 8/31/17	Summus Investment Holdings, LLC Wells Fargo Account Redacted 108 statements and documents
7/1/11 – 6/30/17	Wammel Group LLC TD Ameritrade Account Statements
3/1/10 – 8/31/11	Wammel Group LLC ThinkorSwim Account Statements
1/1/10 – 8/31/17	Wammel Group LLC OptionsXpress Account Statements
1/1/12 – 12/31/16	Del Charter Guarantee & Trust TTEE OptionsXpress Account Statements
3/1/10 – 6/30/17	Arthur Wammel OptionsXpress Account Statements



VIII. Qualifications of Brandi Kleinman

EMPLOYMENT HISTORY

December 2002 – Present

Veritas Advisory Group, Inc.

Vice President

Ms. Kleinman has eighteen years of experience in consulting with clients on a variety of managerial and dispute resolution matters. She provides financial and economic damage evaluations of complex commercial litigation disputes. The types of matters for which Ms. Kleinman has provided services include: breach of contract disputes, infringement of intellectual property rights, breach of fiduciary duty, business interruption, bankruptcy, securities fraud, insurance disputes, construction claims, and various matters related to the valuation of businesses and disputes. Ms. Kleinman has significant experience in the financial services, construction, energy, health care, and insurance industries.

Ms. Kleinman has worked on numerous engagements that involve developing, analyzing, and defending against complex financial, statistical, and economic models in business litigation matters. In addition, Ms. Kleinman has conducted numerous fraud and forensic investigations including alter-ego and piercing the corporate veil investigations of companies and white collar fraud investigations..

June 2000 – December 2002

Navigant Consulting, Inc.

Senior Consultant

Ms. Kleinman's responsibilities and experiences were similar to those at Veritas Advisory Group, Inc.

EDUCATION

2000 University of Texas at Austin
Bachelor of Business Administration – Finance

2005 University of Texas at Dallas
Master of Science in Accounting and Information Management

2008 – 2018 Continuing Professional Education
Numerous in-house and outside sponsored seminars, conferences, and training sessions on:
- financial modeling techniques and financial statement analysis
- business valuation
- fraud and forensic accounting investigations



SPEECHES AND LECTURES

Guest Lecturer - University of Texas at Austin
Upper Division and Graduate Finance and Accounting Classes
Financial Theory and Practice
Money, Banking and Economic Conditions

Guest Lecturer – Texas Christian University
Upper Division Accounting Classes
Managerial Accounting
Business Communication
Role of Accountants in Litigation

Guest Speaker –Thompson & Knight, LLP (Dallas)
Selecting and Working with Damages Experts in Litigation
Intellectual Property Damages

Moderator –Women’s Legal Forum (Houston)
Benefits of Females as Lead Counsel

ACCREDITATION AND PROFESSIONAL ORGANIZATIONS

- * Certified Public Accountant in the State of Texas
- * American Institute of Certified Public Accountants
- * Certified in Financial Forensics



IX. Publications

Brandi N. Kleinman, Steven J. Kmiecik, Alan F. Nagorzanski, Rodney W. Sowards, and Daniel P. Wierzba. 2010. "Accounting Issues in Fraud Investigations." In *Construction Accounting: A Guide for Attorneys and Other Professionals*, ed. Patrick A. McGeehin, Edward G. Benes, Patrick J. Greene, Jr., and Wm. Cary Wright, 281-304. Chicago: ABA Publishing.



X. Testimony Experience of Brandi Kleinman

<u>Case Name</u>	<u>Case #</u>	<u>Court</u>	<u>Testimony</u>
Horizon Mental Health Management, LLC d/b/a Horizon Health Behavioral Health Services v. Multicare Health System d/b/a Multicare Auburn Medical Center		The American Health Lawyers Association Dispute Resolution Service	Arbitration Hearing
Montwood Property, Ltd. v. Residential Funding Corporation, et al.	EP-14-CV-00325-DCG	United States District Court, Western District of Texas, El Paso Division	Deposition
Andrea Polito and Andrea Polito Photography, Inc. v. Neely Moldovan and Andrew Moldovan	No. DC-15-03069	In the District Court of Dallas County, Texas 134 th Judicial District	Trial
Securities and Exchange Commission v. Thurman P. Bryant, III and Bryant United Capital Funding, Inc. And Arthur F. Wammel, Wammel Group, LLC, Thurman P. Bryant, Jr., Carlos Goodspeed a/k/a Sean Phillips d/b/a Top Agent Entertainment d/b/a Mr. Top Agent Entertainment	04:17-CV-00336-ALM	In the United States District Court for the Eastern District of Texas, Sherman Division	Hearing



XI. Charges for Services

Veritas Advisory Group, Inc. charges its clients based on an hourly rate for personnel assigned plus out-of-pocket expenses. The following are the rates for personnel that have performed services in connection with this engagement:

Vice President	\$325 - 375
Principal	\$260
Senior Manager	\$248
Manager	\$234
Senior Consultant	\$207
Associate	\$175
Paraprofessional	\$104

SEC vs. Thurman Bryant III and BUCF
Summary of Net Winners and Amounts for BUCF

Net Winner	Principal Transactions Made to BUCF	Number of Return Payouts to Net Winner	Net Principal Amount Invested to BUCF	Investment Return Amount to Net Winner [1]	Net Amount Received Beyond Invested Principal
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Sources:

- [a] Bryant United Capital Funding, Inc. Wells Fargo Bank statements and corresponding checks, deposits, withdrawals, and wire transfers for account **Redacted** 692 from July 1, 2011 to October 31, 2017
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- [c] Bryant United Holdings Inc. JPMorgan Chase Bank statements and corresponding checks, deposits, withdrawals, and wire transfers for account **Redacted** 324 from January 1, 2010 to October 4, 2011

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- [2] Bryant remitted the Hughes monthly payouts in two forms: cash sent to the Hughes Wells Fargo account and through the \$743.69 monthly repayment of a Regions Bank loan from September 2011 to August 2016. The combination of these payments are shown in Exhibit A.1.
- [3] Tereza Ezell made an initial principal investment on February 6, 2015 for \$100,000. She later withdrew her entire principal investment on April 1, 2016. As a result, her net investment is zero.

SEC vs. Thurman Bryant III and BUCF
Details of Net Winner Transfers for BUCF

Net Winner	Date of Transfer	Net Principal Amounts Invested in BUCF	Payout Amounts Transferred to Net Winner	Transfer Type	Bank Account Transferred To	Account Number
Roland and Holly Maldonado	7/11/2011	(\$214,000)		Principal Investment	Wells Fargo	Redacted 692
Roland and Holly Maldonado	7/28/2011		\$7,000	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	8/24/2011	(3,000)		Principal Investment	Wells Fargo	Redacted 692
Roland and Holly Maldonado	8/25/2011	(22,000)		Principal Investment	Wells Fargo	Redacted 692
Roland and Holly Maldonado	9/1/2011		8,100	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	9/30/2011		8,100	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	10/28/2011		8,100	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	11/28/2011		8,100	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	12/30/2011		8,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	1/26/2012		8,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	2/27/2012		8,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	3/28/2012		8,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	4/27/2012		9,100	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	5/25/2012		9,100	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	6/29/2012		9,100	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	7/30/2012		9,100	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	8/29/2012		9,100	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	9/28/2012		9,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	10/29/2012		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	11/30/2012		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	1/3/2013		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	2/1/2013		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	3/1/2013		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	4/3/2013		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	5/3/2013		15,300	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	6/3/2013		10,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	7/3/2013		10,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	8/2/2013		10,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	9/3/2013		10,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	10/3/2013		10,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	10/16/2013		30,000	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	11/1/2013		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	12/3/2013		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	1/3/2014		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	2/3/2014		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	3/3/2014		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	4/3/2014		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	5/3/2014		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	6/3/2014		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	7/3/2014		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	8/3/2014		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	9/3/2014		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	10/3/2014		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	11/3/2014		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	12/3/2014		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	1/3/2015		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	2/3/2015		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	3/3/2015		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	4/3/2015		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	5/3/2015		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	6/3/2015		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	7/3/2015		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	8/3/2015		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	9/3/2015		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	10/3/2015		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	11/3/2015		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	12/3/2015		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	1/3/2016		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	2/3/2016		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	3/3/2016		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	4/3/2016		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	5/3/2016		15,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	6/3/2016	(20,000)		Principal Investment	Wells Fargo	Redacted 692
Roland and Holly Maldonado	6/3/2016		18,100	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	7/3/2016		18,100	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	8/3/2016		18,100	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	9/3/2016		18,600	Monthly Payout	Wells Fargo	Redacted 032

SEC vs. Thurman Bryant III and BUCF
Details of Net Winner Transfers for BUCF

Net Winner	Date of Transfer	Net Principal Amounts Invested in BUCF	Payout Amounts Transferred to Net Winner	Transfer Type	Bank Account Transferred To	Account Number
Roland and Holly Maldonado	10/3/2016		18,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	11/3/2016		18,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	12/3/2016		18,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	1/3/2017		18,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	2/3/2017		18,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	3/3/2017		18,600	Monthly Payout	Wells Fargo	Redacted 032
Roland and Holly Maldonado	3/31/2017		6,000	Monthly Payout	Wells Fargo	Redacted 032
Hosseign Seddighi	7/29/2011	(70,000)		Principal Investment	Wells Fargo	Redacted 692
Hosseign Seddighi	10/3/2011		2,450	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	11/3/2011		2,450	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	12/3/2011		2,450	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	1/3/2012		2,450	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	2/3/2012		2,450	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	3/2/2012		2,450	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	3/30/2012		2,450	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	5/3/2012		2,450	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	6/1/2012		2,450	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	7/3/2012		2,450	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	8/3/2012		3,450	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	8/31/2012		3,450	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	10/3/2012		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	11/2/2012		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	12/3/2012		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	1/3/2013		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	2/1/2013		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	3/1/2013		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	4/3/2013		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	5/3/2013		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	6/3/2013		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	7/3/2013		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	8/2/2013		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	9/3/2013		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	10/3/2013		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	11/1/2013		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	12/3/2013		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	1/3/2014		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	2/3/2014		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	3/3/2014		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	4/3/2014		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	5/3/2014		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	6/3/2014		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	7/3/2014		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	8/3/2014		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	9/3/2014		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	10/3/2014		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	11/3/2014		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	12/3/2014		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	1/3/2015		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	2/3/2015		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	3/3/2015		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	4/3/2015		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	5/3/2015		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	6/3/2015		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	7/3/2015		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	8/3/2015		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	9/3/2015		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	10/3/2015		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	11/3/2015		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	12/3/2015		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	1/3/2016		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	2/3/2016		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	3/3/2016		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	4/3/2016		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	5/3/2016		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	6/3/2016		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	7/3/2016		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	8/3/2016		2,750	Monthly Payout	Bank of America	Redacted 495

SEC vs. Thurman Bryant III and BUCF
Details of Net Winner Transfers for BUCF

Net Winner	Date of Transfer	Net Principal Amounts Invested in BUCF	Payout Amounts Transferred to Net Winner	Transfer Type	Bank Account Transferred To	Account Number
Hosseign Seddighi	9/3/2016		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	10/3/2016		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	11/3/2016		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	12/3/2016		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	1/3/2017		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	2/3/2017		2,750	Monthly Payout	Bank of America	Redacted 495
Hosseign Seddighi	3/3/2017		2,750	Monthly Payout	Bank of America	Redacted 495
Kenneth and Chelsea Hughes	8/11/2011	(63,000)		Principal Investment	Wells Fargo	Redacted 692
Kenneth and Chelsea Hughes	9/3/2011		2,056	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	10/3/2011		2,656	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	11/3/2011		2,656	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	12/3/2011		2,656	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	1/3/2012		3,156	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	2/3/2012		3,156	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	2/9/2012	(35,000)		Principal Investment	Wells Fargo	Redacted 692
Kenneth and Chelsea Hughes	3/2/2012		3,656	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	4/3/2012		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	5/3/2012		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	6/1/2012		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	7/3/2012		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	8/3/2012		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	8/31/2012		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	10/3/2012		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	11/2/2012		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	12/3/2012		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	1/3/2013		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	2/1/2013		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	3/1/2013		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	4/3/2013		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	5/3/2013		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	6/3/2013		5,080	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	7/3/2013		7,580	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	8/2/2013		7,580	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	9/3/2013		7,580	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	10/3/2013		6,580	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	11/1/2013		6,580	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	12/3/2013		6,580	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	1/6/2014		6,580	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	2/3/2014		6,580	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	3/3/2014		6,580	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	4/3/2014		6,580	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	5/3/2014		6,580	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	5/8/2014	(50,000)		Principal Investment	Wells Fargo	Redacted 692
Kenneth and Chelsea Hughes	6/3/2014		6,580	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	7/3/2014		6,580	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	8/3/2014		8,330	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	9/3/2014		9,336	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	10/3/2014		9,336	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	11/3/2014		9,336	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	12/3/2014		9,336	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	1/3/2015		9,336	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	2/3/2015		9,336	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	3/3/2015		9,336	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	4/3/2015		10,836	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	5/3/2015		11,836	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	6/3/2015		11,836	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	7/3/2015		11,836	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	8/3/2015		11,836	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	9/3/2015		11,836	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	9/4/2015	48,000		Principal Withdrawal	Wells Fargo	Redacted 726
Kenneth and Chelsea Hughes	9/9/2015	(248,000)		Principal Investment	Wells Fargo	Redacted 692
Kenneth and Chelsea Hughes	9/18/2015	(100,000)		Principal Investment	Wells Fargo	Redacted 692
Kenneth and Chelsea Hughes	9/21/2015	100,000		Principal Withdrawal	Wells Fargo	Redacted 896
Kenneth and Chelsea Hughes	9/23/2015	(100,000)		Principal Investment	Wells Fargo	Redacted 692
Kenneth and Chelsea Hughes	10/3/2015		11,836	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	10/6/2015	(152,000)		Principal Investment	Wells Fargo	Redacted 692
Kenneth and Chelsea Hughes	11/3/2015		22,406	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan

SEC vs. Thurman Bryant III and BUCF
Details of Net Winner Transfers for BUCF

Net Winner	Date of Transfer	Net Principal Amounts Invested in BUCF	Payout Amounts Transferred to Net Winner	Transfer Type	Bank Account Transferred To	Account Number
Kenneth and Chelsea Hughes	12/3/2015		28,156	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	1/3/2016		28,156	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	2/3/2016		28,156	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	2/10/2016	(50,000)		Principal Investment	Wells Fargo	Redacted 692
Kenneth and Chelsea Hughes	3/3/2016		28,156	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	4/3/2016		27,906	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	5/3/2016		27,906	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	5/11/2016	(50,000)		Principal Investment	Wells Fargo	Redacted 692
Kenneth and Chelsea Hughes	6/3/2016		28,406	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	7/3/2016		30,156	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	8/3/2016		30,540	Monthly Payout	Wells Fargo/Regions Bank	Redacted 896/Loan
Kenneth and Chelsea Hughes	9/3/2016		30,400	Monthly Payout	Wells Fargo	Redacted 896
Kenneth and Chelsea Hughes	10/3/2016		30,400	Monthly Payout	Wells Fargo	Redacted 896
Kenneth and Chelsea Hughes	11/3/2016		30,400	Monthly Payout	Wells Fargo	Redacted 896
Kenneth and Chelsea Hughes	11/9/2016	(50,000)		Principal Investment	Wells Fargo	Redacted 692
Kenneth and Chelsea Hughes	12/3/2016		30,400	Monthly Payout	Wells Fargo	Redacted 896
Kenneth and Chelsea Hughes	1/3/2017		32,150	Monthly Payout	Wells Fargo	Redacted 896
Kenneth and Chelsea Hughes	2/3/2017		31,650	Monthly Payout	Wells Fargo	Redacted 896
Kenneth and Chelsea Hughes	3/3/2017		31,650	Monthly Payout	Wells Fargo	Redacted 896
Teresa Ezell	2/6/2015	(100,000)		Principal Investment	Wells Fargo	Redacted 692
Teresa Ezell	4/2/2015		2,500	Monthly Payout	C-E FCU	Redacted 101
Teresa Ezell	5/1/2015		2,500	Monthly Payout	C-E FCU	Redacted 101
Teresa Ezell	6/2/2015		2,500	Monthly Payout	C-E FCU	Redacted 101
Teresa Ezell	7/2/2015		2,500	Monthly Payout	C-E FCU	Redacted 101
Teresa Ezell	7/31/2015		2,500	Monthly Payout	C-E FCU	Redacted 101
Teresa Ezell	9/2/2015		2,500	Monthly Payout	C-E FCU	Redacted 101
Teresa Ezell	10/1/2015		2,500	Monthly Payout	C-E FCU	Redacted 101
Teresa Ezell	11/2/2015		2,500	Monthly Payout	C-E FCU	Redacted 101
Teresa Ezell	12/2/2015		2,500	Monthly Payout	C-E FCU	Redacted 101
Teresa Ezell	1/4/2016		2,500	Monthly Payout	C-E FCU	Redacted 101
Teresa Ezell	2/2/2016		2,500	Monthly Payout	C-E FCU	Redacted 101
Teresa Ezell	3/2/2016		2,500	Monthly Payout	C-E FCU	Redacted 101
Teresa Ezell	4/1/2016	100,000		Principal Withdrawal	C-E FCU	Redacted 101
Blair Knapp	1/3/2014	(20,000)		Principal Investment	Wells Fargo	Redacted 692
Blair Knapp	1/9/2014	(20,000)		Principal Investment	Wells Fargo	Redacted 692
Blair Knapp	3/3/2014		1,000	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	4/3/2014		1,000	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	5/3/2014		1,000	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	6/3/2014		1,000	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	7/3/2014	(50,000)		Principal Investment	Wells Fargo	Redacted 692
Blair Knapp	7/3/2014		1,000	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	8/3/2014		1,000	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	9/3/2014		2,250	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	10/3/2014		2,250	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	11/3/2014		2,250	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	12/3/2014		2,250	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	1/3/2015		2,250	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	2/3/2015		2,250	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	3/3/2015		2,250	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	4/3/2015		2,250	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	5/3/2015		2,250	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	5/22/2015	(20,000)		Principal Investment	Wells Fargo	Redacted 692
Blair Knapp	6/3/2015		2,250	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	7/3/2015		2,250	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	8/3/2015		2,750	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	9/3/2015		2,750	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	10/3/2015		2,750	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	11/3/2015		2,750	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	12/3/2015		2,750	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	1/3/2016		2,750	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	2/3/2016		2,750	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	3/3/2016		2,750	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	4/1/2016	90,000		Principal Withdrawal	Wells Fargo	Redacted 411
Blair Knapp	4/3/2016		500	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	5/3/2016		500	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	6/3/2016		500	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	7/3/2016		500	Monthly Payout	Wells Fargo	Redacted 411

SEC vs. Thurman Bryant III and BUCF
Details of Net Winner Transfers for BUCF

Net Winner	Date of Transfer	Net Principal Amounts Invested in BUCF	Payout Amounts Transferred to Net Winner	Transfer Type	Bank Account Transferred To	Account Number
Blair Knapp	8/3/2016		500	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	9/3/2016		500	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	10/3/2016		500	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	11/3/2016		500	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	11/21/2016	(20,000)		Principal Investment	Wells Fargo	Redacted 692
Blair Knapp	12/3/2016		500	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	1/3/2017		500	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	2/3/2017		1,000	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	3/3/2017		1,000	Monthly Payout	Wells Fargo	Redacted 411
Blair Knapp	3/31/2017		1,000	Monthly Payout	Wells Fargo	Redacted 411

Sources:

- [a] Bryant United Capital Funding, Inc Wells Fargo Bank statements and corresponding checks, deposits, withdrawals, and wire transfers for account Redacted 692 from July 1, 2011 to October 31, 2017
- [b] Bryant United Capital Funding, Inc Wells Fargo Bank Direct Pay Statements for account Redacted 692 from January 1, 2012 to April 5, 2017
- [c] Bryant United Holdings Inc JPMorgan Chase Bank statements and corresponding checks, deposits, withdrawals, and wire transfers for account Redacted 324 from January 1, 2010 to October 4, 2011

Notes:

- [1] February monthly return payouts are included in the calculation for amounts received by Net Winners. These February payouts do not appear on the BUCF Wells Fargo Direct Pay statement for each investor, but the combined withdrawal transaction is shown on BUCF's Wells Fargo February monthly bank statement. Veritas determined the February monthly payout remitted to each investor by assuming it was the same as their March 2017 payout.
- [2] Bryant remitted the Hughes monthly payouts in two forms: cash sent to the Hughes Wells Fargo account and through the \$743.69 monthly repayment of a Regions Bank loan from September 2011 to August 2016. The combination of these payments are shown in Exhibit A.1
- [3] Tereza Ezell made an initial principal investment on February 6, 2015 for \$100,000. She later withdrew her entire principal investment on April 1, 2016. As a result, her net investment is zero.

SEC vs. Thurman Bryant III and BUCF
Summary of Net Winners and Amounts for Wammel Group

Net Winner	Principal Transactions Made to Wammel Group	Number of Return Payouts to Net Winner	Net Principal Amount Invested to Wammel Group	Investment Return Amount to Net Winner	Net Amount Received Beyond Invested Principal
Robert and Sandra Bailey	1	61	(\$200,000)	\$377,315	\$177,315
Stephen Garrett [1]	10	49	(646,000)	808,766	162,766
	11	110	(\$846,000)	\$1,186,081	\$340,081

Sources:

- [a] Wammel Group, LLC Wells Fargo Bank statements and corresponding checks, deposits, withdrawals, and wire transfers for account Redacted 950 from January 1, 2010 to August 31, 2017
- [b] Wammel Group, LLC Wells Fargo Bank Direct Pay Statements for account Redacted 950 from January 1, 2012 to April 5, 2017
- [c] Arthur Wammel Wells Fargo Bank statements and corresponding checks, deposits, withdrawals, and wire transfers for account Redacted 284 from April 15, 2010 to September 15, 2017
- [d] Checks from Stephen Garret paid to Wammel Group from October 5, 2015 to July 19, 2017
- [e] Interview of Stephen Garret on October 5, 2017 Notes

Note:

- [1] According to the Stephen Garret interview notes, Garrett and Wammel made multiple transfers for a number of purposes. For the purposes of this calculation, Veritas included only transfers related to Garrett's investment in Wammel Group LLC.

SEC vs. Thurman Bryant III and BUCF
Details of Net Winners Transfers for Wammel Group

Net Winner	Date of Transfer	Net Principal Amounts Invested in Wammel Group	Payout Amounts Transferred to Net Winner	Transfer Type	Bank Account Transferred To	Account Number
Robert and Sandra Bailey	1/11/2012	(\$200,000)		Principal Investment	Wells Fargo	Redacted 950
Robert and Sandra Bailey	2/24/2012		\$6,500	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	3/23/2012		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	4/27/2012		6,275	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	5/25/2012		6,560	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	6/22/2012		6,250	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	7/27/2012		6,300	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	8/24/2012		6,325	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	9/28/2012		6,250	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	10/26/2012		6,250	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	11/26/2012		6,250	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	12/31/2012		6,000	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	1/28/2013		6,000	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	2/26/2013		6,000	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	3/25/2013		6,050	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	4/26/2013		6,500	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	5/24/2013		6,150	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	6/28/2013		6,250	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	7/26/2013		6,250	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	8/23/2013		6,200	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	9/27/2013		6,250	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	10/25/2013		6,250	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	11/22/2013		6,200	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	12/31/2013		6,250	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	1/24/2014		6,250	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	2/28/2014		6,100	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	3/28/2014		6,150	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	4/25/2014		6,000	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	5/23/2014		6,250	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	6/27/2014		6,150	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	7/25/2014		6,050	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	8/22/2014		6,150	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	9/26/2014		6,150	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	10/24/2014		6,150	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	10/28/2014		450	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	12/1/2014		6,550	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	12/29/2014		6,600	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	1/23/2015		6,550	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	2/27/2015		6,555	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	3/27/2015		6,525	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	4/24/2015		6,520	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	5/22/2015		6,250	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	6/26/2015		6,505	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	7/24/2015		6,550	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	8/28/2015		6,000	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	9/25/2015		6,500	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	10/23/2015		6,400	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	12/1/2015		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	12/29/2015		6,250	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	1/22/2016		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	2/26/2016		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	3/28/2016		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	4/22/2016		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	5/27/2016		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	6/24/2016		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	7/22/2016		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	8/26/2016		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	9/23/2016		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	10/28/2016		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	11/28/2016		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	12/23/2016		6,350	Monthly Distribution	Shell FCU	Redacted 652
Robert and Sandra Bailey	3/24/2017		5,500	Monthly Distribution	Shell FCU	Redacted 652
Stephen Garrett [1]	5/2/2013	(391,000)		Principal Investment	Wells Fargo	Redacted 950
Stephen Garrett	6/4/2013		3,390	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett [2]	6/13/2013		50,000	Bridge Loan	Amoco FCU	Redacted 010
Stephen Garrett	6/28/2013		6,760	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	7/26/2013		6,860	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	8/23/2013		6,734	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	9/27/2013		6,328	Monthly Distribution	Amoco FCU	Redacted 010

SEC vs. Thurman Bryant III and BUCF
Details of Net Winners Transfers for Wammel Group

Net Winner	Date of Transfer	Net Principal Amounts Invested in Wammel Group	Payout Amounts Transferred to Net Winner	Transfer Type	Bank Account Transferred To	Account Number
Stephen Garrett [2]	10/18/2013		15,000	Bridge Loan	Amoco FCU	Redacted 010
Stephen Garrett	10/25/2013		6,360	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	11/22/2013		6,230	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	12/31/2013		6,080	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	1/24/2014		6,105	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	2/28/2014		6,034	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	3/28/2014		5,876	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	4/25/2014		5,900	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett [2]	5/12/2014		50,000	Bridge Loan	Amoco FCU	Redacted 010
Stephen Garrett [2]	5/13/2014		25,000	Bridge Loan	Amoco FCU	Redacted 010
Stephen Garrett [2]	5/15/2014		50,000	Bridge Loan	Amoco FCU	Redacted 010
Stephen Garrett	5/23/2014		6,160	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	6/27/2014		6,535	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett [2]	7/22/2014		50,000	Bridge Loan	Amoco FCU	Redacted 010
Stephen Garrett	7/25/2014		6,230	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	8/22/2014		6,305	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	9/17/2014	(175,000)		Principal Investment	Wells Fargo	Redacted 950
Stephen Garrett	9/26/2014		6,200	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett [2]	11/18/2014		50,000	Bridge Loan	Amoco FCU	Redacted 010
Stephen Garrett	2/27/2015		5,615	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	3/27/2015		5,710	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	4/24/2015		5,652	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	5/22/2015		4,720	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	6/26/2015		5,195	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett [2]	7/15/2015		50,000	Bridge Loan	Amoco FCU	Redacted 010
Stephen Garrett	7/24/2015		5,205	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	8/28/2015		2,486	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	9/25/2015		5,000	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	10/23/2015		5,125	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	12/1/2015		5,005	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	12/29/2015		5,525	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	1/22/2016		5,505	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	2/26/2016		5,525	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	3/28/2016		5,625	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	4/22/2016		5,505	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	5/27/2016		5,480	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	6/24/2016		5,450	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	7/22/2016		5,480	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	8/26/2016		4,040	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	9/23/2016		4,210	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett	10/28/2016		4,240	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett [2]	11/14/2016		250,000	Bridge Loan	Amoco FCU	Redacted 010
Stephen Garrett	11/28/2016		4,141	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett [3]	12/15/2016	(10,000)		Prepayment Penalty	Arthur Wammel	Redacted 284
Stephen Garrett	12/23/2016		4,240	Monthly Distribution	Amoco FCU	Redacted 010
Stephen Garrett [3]	1/27/2017	(10,000)		Prepayment Penalty	Wells Fargo	Redacted 950
Stephen Garrett [3]	2/27/2017	(10,000)		Prepayment Penalty	Wells Fargo	Redacted 950
Stephen Garrett [3]	3/23/2017	(10,000)		Prepayment Penalty	Wells Fargo	Redacted 950
Stephen Garrett [3]	4/25/2017	(10,000)		Prepayment Penalty	Wells Fargo	Redacted 950
Stephen Garrett [3]	5/17/2017	(10,000)		Prepayment Penalty	Wells Fargo	Redacted 950
Stephen Garrett [3]	6/19/2017	(10,000)		Prepayment Penalty	Wells Fargo	Redacted 950
Stephen Garrett [3]	7/19/2017	(10,000)		Prepayment Penalty	Wells Fargo	Redacted 950

SEC vs. Thurman Bryant III and BUCF
Details of Net Winners Transfers for Wammel Group

Net Winner	Date of Transfer	Net Principal Amounts Invested in Wammel Group	Payout Amounts Transferred to Net Winner	Transfer Type	Bank Account Transferred To	Account Number
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Sources:

- [a] Wammel Group, LLC Wells Fargo Bank statements and corresponding checks, deposits, withdrawals, and wire transfers for account [REDACTED] 950 from January 1, 2010 to August 31, 2017
- [b] Wammel Group, LLC Wells Fargo Bank Direct Pay Statements for account [REDACTED] 950 from January 1, 2012 to April 5, 2017
- [c] Arthur Wammel Wells Fargo Bank statements and corresponding checks, deposits, withdrawals, and wire transfers for account [REDACTED] 284 from April 15, 2010 to September 15, 2017
- [d] Checks from Stephen Garret paid to Wammel Group from October 5, 2015 to July 19, 2017
- [e] Interview of Stephen Garret on October 5, 2017 Notes

Notes:

- [1] Garrett transferred \$617,000 to Wammel Group on May 2, 2013 Per Garrett interview notes, \$391,000 was for an investment in Wammel Group and \$226,000 was related to a home mortgage transaction
- [2] Garrett took out several Bridge Loans from his investment in Wammel Group Per Garrett interview notes, these Bridge Loans were loans for paying back investments
- [3] Per Garrett interview notes, he would pay \$10,000 monthly penalty payments to Wammel Group in order for him to make large lump sum withdrawals These lump sum withdrawals would take a loss when withdrawn The monthly penalty fees were to cover the loss taken