



DB12000P - Deutsche Bank Private Bank

Batch Date: 6/15/2017

Added to Monitoring: 06/15/2017

Alert Date: 6/15/2017

Alert

Organization: Southern Financial LLC
Address: Country: VIRGIN ISLANDS, U.S.
Tracking ID: KYC 1790655

Reporting ID:

Alerted Entity #: 1 of 4

Risk Priority: Critical

Alert ID: 9476247.11602637.65444359

Entity Information

Entity ID: 65444359

Riskid: R22434574

Entity Name: Southern Financial Group Inc.

Address: • Charleston, South Carolina, UNITED STATES
• Columbia, South Carolina, UNITED STATES

Recent Event(s): • SEC - SEC Violations (Insider Trading, Securities Fraud) / CHG - Charged, 02/11/2008
Southern Financial Group was later shut down by the Securities and Exchange Commission after being charged in 2002 with a \$25 million Ponzi scheme. The alleged fraud was unrelated to the Capstone bonds., 02/11/2008, [Investment News](#)

Consistent with the terms and conditions of your RDC Subscriber Agreement, the information contained in this document is for alert purposes only and is not to be used for purposes of determining an individual's eligibility for any credit or any other FCRA permissible purposes. User further agrees to hold such material and information in strictest confidence, not to make use thereof other than for authorized purposes, to relate it only to employees requiring such information, and not to release or disclose it to any other party. The Alert information contained in this document may or may not pertain to the individual or entity referenced in your inquiry.

SDNY_GM_00058296 Page 1 of 9

CONFIDENTIAL

CONFIDENTIAL – PURSUANT TO FED. R. CRIM. P. 6(e)

DB-SDNY-0021120
EFTA_00168856

EFTA01296179



DB12000P - Deutsche Bank Private Bank

Batch Date: 6/15/2017

Added to Monitoring: 06/15/2017

Alert Date: 6/15/2017

Alert
6/15/2017

Organization: Southern Financial LLC
Address: Country: VIRGIN ISLANDS, U.S.
Tracking ID: KYC 1790655

Reporting ID:

Alerted Entity #: 1 of 4 Risk Priority: Critical Alert ID: 9476247.11602637.65444359

- Event:**
- SEC - SEC Violations (Insider Trading, Securities Fraud) / ACT - Disciplinary, Regulatory Action, 03/09/2005
The SEC's complaint alleged that Southern's books and financial records inaccurately reflected a cash balance in an account ranging from \$226,931.80 to \$240,006.80; Southern failed to promptly give notice to the SEC and others of the net capital deficiencies as required by law; and that, the reports filed by Southern were inaccurate in that they misrepresented Southern's cash position and failed to include certain liabilities., 03/09/2005, [SEC Administrative Proceedings - 2005](#)
 - SEC - SEC Violations (Insider Trading, Securities Fraud) / ACT - Disciplinary, Regulatory Action, 02/02/2005
The SEC's Complaint alleged that defendants Hunter, Southern Financial Group, Inc., Richard M. Wooten and Charles Dennis McKittrick raised at least \$25 million through a fraudulent scheme involving the sale of short-term notes on behalf of UC Properties LLC; that defendants operated these note offerings as a Ponzi scheme, using funds raised from current note offerings to pay principal and interest to investors in prior offerings, and that at least \$5 million was transferred to relief defendant Springdale Investments, Inc.; that Southern operated in violation of the net capital rule since at least October 2001, and that the firm's FOCUS reports and other books and records have been inaccurate since that time., 02/02/2005, [SEC Litigation Releases - 2005](#)
 - SEC - SEC Violations (Insider Trading, Securities Fraud) / ACT - Disciplinary, Regulatory Action, 12/22/2004
The SEC announced that US District Judge for the District of South Carolina, Charleston Division entered Final Judgments as to Defendants Southern Financial Group, Inc., Richard M. Wooten, and Charles Dennis McKittrick. The Complaint alleged that defendants McKittrick, Gerald F. Hunter, Jr., Southern and Wooten raised at least \$25 million through a fraudulent scheme involving the sale of short-term notes on behalf of UC Properties LLC; alleged that they operated these note offerings as a Ponzi scheme, using funds raised from current note offerings to pay principal and interest to investors in prior offerings, and that at least \$5 million was transferred to relief defendant Springdale Investments, Inc.; further alleged that Southern operated in violation of the net capital rule since at least October 2001, and that the firm's FOCUS reports and other books and records have been inaccurate since that time., 12/22/2004, [SEC Litigation Releases - 2004](#)
 - SEC - SEC Violations (Insider Trading, Securities Fraud) / ACT - Disciplinary, Regulatory Action, 06/19/2002
The SEC announced that US District Judge for the District of South Carolina, Charleston Division entered orders of preliminary injunction and other relief as to defendants Southern Financial Group, Inc. and Richard M. Wooten. The complaint alleged that defendants Southern, Wooten, Charles Dennis McKittrick, and Gerald F. Hunter, Jr. raised at least \$25 million through a fraudulent scheme involving the sale of short-term notes on behalf of UC Properties LLC; alleged that they operated these note offerings as a Ponzi scheme, using funds raised from current note offerings to pay principal and interest to investors in prior offerings, and that at least \$5 million was transferred to relief defendant Springdale; further alleged that Southern operated in violation of the net capital rule since at least October 2001, and that the firm's FOCUS reports and other books and records have been inaccurate since that time., 06/19/2002, [SEC Litigation Releases - 2002](#)
 - SEC - SEC Violations (Insider Trading, Securities Fraud) / CHG - Charged, 02/11/2008

Consistent with the terms and conditions of your RDC Subscriber Agreement, the information contained in this document is for alert purposes only and is not to be used for purposes of determining an individual's eligibility for any credit or any other FCRA permissible purposes. User further agrees to hold such material and information in strictest confidence, not to make use thereof other than for authorized purposes, to relate it only to employees requiring such information, and not to release or disclose it to any other party. The Alert information contained in this document may or may not pertain to the individual or entity referenced in your inquiry.

SDNY_GM_00058297 Page 2 of 9

CONFIDENTIAL

CONFIDENTIAL - PURSUANT TO FED. R. CRIM. P. 6(e)

DB-SDNY-0021121

EFTA_00168857

EFTA01296180



DB12000P - Deutsche Bank Private Bank

Batch Date: 6/15/2017

Added to Monitoring: 06/15/2017

Alert Date: 6/15/2017

Alert

Organization: Southern Financial LLC
Address: Country: VIRGIN ISLANDS, U.S.
Tracking ID: KYC 1790655

Reporting ID:

Alerted Entity #: 1 of 4

Risk Priority: Critical

Alert ID: 9476247.11602637.65444359

Southern Financial Group was later shut down by the Securities and Exchange Commission after being charged in 2002 with a \$25 million Ponzi scheme. The alleged fraud was unrelated to the Capstone bonds., 02/11/2008, [Investment News](#)

Alert Notes

Notes: Southern Financial Group Inc. , was charged with securities fraud .

Source Information

RDC URL: <https://grid.rdc.com/wss/entity.html?entityId=3012122812fb8b125d3f3d53eb346cc4>

Source Name: RiskConnect, 06/14/2017

- Entity URL:**
- <http://www.sec.gov/litigation/litreleases/lr19009.htm>
 - <http://www.sec.gov/litigation/litreleases/lr19060.htm>
 - <http://www.sec.gov/litigation/admin/34-50966.htm>
 - <http://www.sec.gov/litigation/admin/34-51207.htm>
 - <http://www.sec.gov/litigation/admin/34-51349.htm>
 - <http://www.sec.gov/litigation/litreleases/lr17574.htm>
 - <http://www.sec.gov/litigation/litreleases/lr17569.htm>
 - <http://www.sec.gov/litigation/litreleases/lr17535.htm>

- Sources:**
- Investment News, MEDIA Article,Headline:FINRA board member's firm embroiled in muni fraud case; Jury awards plaintiff \$1.2 million, <http://global.factiva.com/en/du/article.asp?NAPC=S&AccessionNo=INVN000020080215e42b00009>
 - SEC Litigation Releases - 2004, SEC Litigation Releases - 2004, <http://www.sec.gov/litigation/litreleases/litrelarchive/litarchive2004.shtml>
 - SEC Litigation Releases - 2005, SEC Litigation Releases - 2005, <http://www.sec.gov/litigation/litreleases/litrelarchive/litarchive2005.shtml>
 - SEC Administrative Proceedings - 2005, SEC Administrative Proceedings - 2005, <http://www.sec.gov/litigation/admin/adminarchive/adminarc2005.shtml>
 - SEC Litigation Releases - 2002, SEC Litigation Releases - 2002, <http://www.sec.gov/litigation/litreleases/litrelarchive/litarchive2002.shtml>

Consistent with the terms and conditions of your RDC Subscriber Agreement, the information contained in this document is for alert purposes only and is not to be used for purposes of determining an individual's eligibility for any credit or any other FCRA permissible purposes. User further agrees to hold such material and information in strictest confidence, not to make use thereof other than for authorized purposes, to relate it only to employees requiring such information, and not to release or disclose it to any other party. The Alert information contained in this document may or may not pertain to the individual or entity referenced in your inquiry.

SDNY_GM_00058298 Page 3 of 9

CONFIDENTIAL

CONFIDENTIAL – PURSUANT TO FED. R. CRIM. P. 6(e)

DB-SDNY-0021122

EFTA_00168858

EFTA01296181



DB12000P - Deutsche Bank Private Bank

Batch Date: 6/15/2017

Added to Monitoring: 06/15/2017

Alert Date: 6/15/2017

Alert

Organization: Southern Financial LLC
Address: Country: VIRGIN ISLANDS, U.S.
Tracking ID: KYC 1790655

Reporting ID:

Alerted Entity #: 2 of 4

Risk Priority: Critical

Alert ID: 9476247.11602637.65374193

Entity Information

Entity ID: 65374193

Riskid: R2601172

Entity Name: Southern Financial Group

Alias: SFG

Address: Greensboro, North Carolina, UNITED STATES

Recent Event(s): • SEC - SEC Violations (Insider Trading, Securities Fraud) / ACT - Disciplinary, Regulatory Action, 04/29/2008

The SEC announced that the USDC for the Middle District of North Carolina entered final judgments against defendants Elfindepan, S.A., Strategic Asset Funds, S.A., and Southern Financial Group for their roles in a high-yield investment scheme. Elfindepan, a defunct Costa Rican company, SAF, a defunct Panamanian company, and SFG, a de facto trust, were controlled by defendant Tracy Dunlap. The Commission alleging that Elfindepan, SFG, SAF, and others defrauded investors nationwide of approximately \$30 million in connection with a high-yield investment scheme involving the unregistered offer and sale of Securities of Elfindepan, a purported Costa Rican financial company; alleges that Elfindepan made numerous materially false and misleading statements including promising investors that their investments were secure and would yield returns of as much as 40% to 50% per month., 04/29/2008, [SEC Litigation Releases - 2008](#)

Consistent with the terms and conditions of your RDC Subscriber Agreement, the information contained in this document is for alert purposes only and is not to be used for purposes of determining an individual's eligibility for any credit or any other FCRA permissible purposes. User further agrees to hold such material and information in strictest confidence, not to make use thereof other than for authorized purposes, to relate it only to employees requiring such information, and not to release or disclose it to any other party. The Alert information contained in this document may or may not pertain to the individual or entity referenced in your inquiry.

SDNY_GM_00058299 Page 4 of 9

CONFIDENTIAL

CONFIDENTIAL – PURSUANT TO FED. R. CRIM. P. 6(e)

DB-SDNY-0021123

EFTA_00168859

EFTA01296182



Organization: Southern Financial LLC
Address: Country: VIRGIN ISLANDS, U.S.
Tracking ID: KYC 1790655

Reporting ID:

Alerted Entity #: 2 of 4 Risk Priority: Critical Alert ID: 9476247.11602637.65374193

- Event:**
- SEC - SEC Violations (Insider Trading, Securities Fraud) / ACT - Disciplinary, Regulatory Action, 04/29/2008
The SEC announced that the USDC for the Middle District of North Carolina entered final judgments against defendants Elfindepan, S.A., Strategic Asset Funds, S.A., and Southern Financial Group for their roles in a high-yield investment scheme. Elfindepan, a defunct Costa Rican company, SAF, a defunct Panamanian company, and SFG, a de facto trust, were controlled by defendant Tracy Dunlap. The Commission alleging that Elfindepan, SFG, SAF, and others defrauded investors nationwide of approximately \$30 million in connection with a high-yield investment scheme involving the unregistered offer and sale of Securities of Elfindepan, a purported Costa Rican financial company; alleges that Elfindepan made numerous materially false and misleading statements including promising investors that their investments were secure and would yield returns of as much as 40% to 50% per month., 04/29/2008, [SEC Litigation Releases - 2008](#)
 - SEC - SEC Violations (Insider Trading, Securities Fraud) / ACT - Disciplinary, Regulatory Action, 09/12/2002
The Court in this case adjudged defendants Elfindepan, Southern Financial Group, and Tracy Calvin Dunlap, Jr., to be in contempt of court and ordered Dunlap incarcerated based on their refusal to obey court orders requiring them to produce documents and account for and repatriate investor funds., 09/12/2002, [SEC Litigation Releases - 2002](#)
 - SEC - SEC Violations (Insider Trading, Securities Fraud) / ACT - Disciplinary, Regulatory Action, 04/26/2001
On March 15, 2001, the U.S. District Court for the Middle District of North Carolina adjudged Elfindepan, S.A., Southern Financial Group and Tracy Calvin Dunlap, Jr. to be in civil contempt of court based on their refusal to obey court orders requiring them to produce documents, and account for and repatriate investor funds, related to their allegedly fraudulent investment schemes. They refused to comply as ordered based on their assertion of Dunlap's personal Fifth Amendment privilege against self-incrimination., 04/26/2001, [SEC Litigation Releases - 2001](#)
 - SEC - SEC Violations (Insider Trading, Securities Fraud) / ACT - Disciplinary, Regulatory Action, 08/10/2000
The SEC filed a fraud case in the United States District Court for the Middle District of North Carolina against Elfindepan, S.A., Southern Financial Group, Tracy Calvin Dunlap, Jr. and Barry Lowe. The SEC complaint alleges that, the defendants defrauded investors nationwide in an apparent Ponzi or pyramid scheme in connection with the unregistered offer and sale of the securities of Elfindepan, alleges that in connection with these offerings, defendants knowingly and recklessly made, and caused others to make, numerous materially false and misleading statements to investors, defendants promised investors highly favorable returns on investments, without any reasonable basis for such claims, and falsely stated that the investments were secure, including false claims that Elfindepan investments were associated with the International Monetary Fund and the World Bank and also alleges that defendants knowingly or recklessly failed to disclose certain material facts to investors regarding Elfindepan., 08/10/2000, [SEC Litigation Releases - 2000](#)

Alert Notes

Notes: Southern Financial Group was charged with securities fraud .

Consistent with the terms and conditions of your RDC Subscriber Agreement, the information contained in this document is for alert purposes only and is not to be used for purposes of determining an individual's eligibility for any credit or any other FCRA permissible purposes. User further agrees to hold such material and information in strictest confidence, not to make use thereof other than for authorized purposes, to relate it only to employees requiring such information, and not to release or disclose it to any other party. The Alert information contained in this document may or may not pertain to the individual or entity referenced in your inquiry. SDNY_GM_00058300 Page 5 of 9

CONFIDENTIAL



DB12000P - Deutsche Bank Private Bank

Batch Date: 6/15/2017

Added to Monitoring: 06/15/2017

Alert Date: 6/15/2017

Alert

Organization: Southern Financial LLC
Address: Country: VIRGIN ISLANDS, U.S.
Tracking ID: KYC 1790655

Reporting ID:

Alerted Entity #: 2 of 4

Risk Priority: Critical

Alert ID: 9476247.11602637.65374193

Source Information

RDC URL: <https://grid.rdc.com/wss/entity.html?entityId=3dcbf500405acc025d3f3d53eb346cc4>

Source Name: RiskConnect, 06/14/2017

- Entity URL:
- <http://www.sec.gov/litigation/litreleases/lr17723.htm>
 - <http://www.sec.gov/litigation/litreleases/2008/lr20543.htm>
 - <http://www.sec.gov/litigation/litreleases/lr16977.htm>
 - <http://www.sec.gov/litigation/litreleases/lr16649.htm>
 - <http://www.sec.gov/litigation/litreleases/lr16892.htm>

- Sources:
- SEC Litigation Releases - 2002, SEC Litigation Releases - 2002, <http://www.sec.gov/litigation/litreleases/litrelarchive/litarchive2002.shtml>
 - SEC Litigation Releases - 2008, SEC Litigation Releases - 2008, <http://www.sec.gov/litigation/litreleases/litrelarchive/litarchive2008.shtml>
 - SEC Litigation Releases - 2001, SEC Litigation Releases - 2001, <http://www.sec.gov/litigation/litreleases/litrelarchive/litarchive2001.shtml>
 - SEC Litigation Releases - 2000, SEC Litigation Releases - 2000, <http://www.sec.gov/litigation/litreleases/litrelarchive/litarchive2000.shtml>

Consistent with the terms and conditions of your RDC Subscriber Agreement, the information contained in this document is for alert purposes only and is not to be used for purposes of determining an individual's eligibility for any credit or any other FCRA permissible purposes. User further agrees to hold such material and information in strictest confidence, not to make use thereof other than for authorized purposes, to relate it only to employees requiring such information, and not to release or disclose it to any other party. The Alert information contained in this document may or may not pertain to the individual or entity referenced in your inquiry.

SDNY_GM_00058301 Page 6 of 9

CONFIDENTIAL

CONFIDENTIAL – PURSUANT TO FED. R. CRIM. P. 6(e)

DB-SDNY-0021125
EFTA_00168861

EFTA01296184



DB12000P - Deutsche Bank Private Bank

Batch Date: 6/15/2017

Added to Monitoring: 06/15/2017

Alert Date: 6/15/2017

Alert
6/15/2017

Organization: Southern Financial LLC

Address: Country: VIRGIN ISLANDS, U.S.

Tracking ID: KYC 1790655

Reporting ID:

Alerted Entity #: 3 of 4

Risk Priority: Critical

Alert ID: 9476247.11602637.64747171

Entity Information

Entity ID: 64747171

Riskid: R22436125

Entity Name: Southern Financial Services

Alias: Southern Financial Services Inc.

Address: Asheville, North Carolina, UNITED STATES

Recent Event(s): • FRD - Fraud, Scams, Swindles / ASC - Associated with, Seen with, 02/04/2011

U.S. Attorney Anne M. Tompkins announced that, James W. "Bill" Bailey, Jr. had his initial appearance on three federal criminal counts, Securities Fraud, Mail Fraud and Filing False Tax Returns Charges, which was filed in a Bill of Information in U.S. District Court in Asheville on February 1, 2010. The counts against Bailey charge that he engaged in a "Ponzi" scheme from about January 2000 to December 2010 to defraud investors of more than \$13 million. According to the Bill of Information, the defendant founded and operated Southern Financial Services Inc, 1031 Exchange Services, LLC and AVL Properties, LLC in Asheville. Court documents state that through Southern Financial Services Inc., Bailey fraudulently induced clients to deposit monies and purported to provide asset management, IRA accounts, and wills and trusts services., 02/04/2011, [DOJ US Attorneys Offices Press Releases 2009 to 2012](#)

• SEC - SEC Violations (Insider Trading, Securities Fraud) / ASC - Associated with, Seen with, 02/04/2011
U.S. Attorney Anne M. Tompkins announced that, James W. "Bill" Bailey, Jr. had his initial appearance on three federal criminal counts, Securities Fraud, Mail Fraud and Filing False Tax Returns Charges, which was filed in a Bill of Information in U.S. District Court in Asheville on February 1, 2010. The counts against Bailey charge that he engaged in a "Ponzi" scheme from about January 2000 to December 2010 to defraud investors of more than \$13 million. According to the Bill of Information, the defendant founded and operated Southern Financial Services Inc, 1031 Exchange Services, LLC and AVL Properties, LLC in Asheville. Court documents state that through Southern Financial Services Inc., Bailey fraudulently induced clients to deposit monies and purported to provide asset management, IRA accounts, and wills and trusts services., 02/04/2011, [DOJ US Attorneys Offices Press Releases 2009 to 2012](#)

• TAX - Tax Related Offenses / ASC - Associated with, Seen with, 02/04/2011
U.S. Attorney Anne M. Tompkins announced that, James W. "Bill" Bailey, Jr. had his initial appearance on three federal criminal counts, Securities Fraud, Mail Fraud and Filing False Tax Returns Charges, which was filed in a Bill of Information in U.S. District Court in Asheville on February 1, 2010. The counts against Bailey charge that he engaged in a "Ponzi" scheme from about January 2000 to December 2010 to defraud investors of more than \$13 million. According to the Bill of Information, the defendant founded and operated Southern Financial Services Inc, 1031 Exchange Services, LLC and AVL Properties, LLC in Asheville. Court documents state that through Southern Financial Services Inc., Bailey fraudulently induced clients to deposit monies and purported to provide asset management, IRA accounts, and wills and trusts services., 02/04/2011, [DOJ US Attorneys Offices Press Releases 2009 to 2012](#)

Consistent with the terms and conditions of your RDC Subscriber Agreement, the information contained in this document is for alert purposes only and is not to be used for purposes of determining an individual's eligibility for any credit or any other FCRA permissible purposes. User further agrees to hold such material and information in strictest confidence, not to make use thereof other than for authorized purposes, to relate it only to employees requiring such information, and not to release or disclose it to any other party. The Alert information contained in this document may or may not pertain to the individual or entity referenced in your inquiry.

SDNY_GM_00058302 Page 7 of 9

CONFIDENTIAL



Organization: Southern Financial LLC
Address: Country: VIRGIN ISLANDS, U.S.
Tracking ID: KYC 1790655

Reporting ID:

Alerted Entity #: 3 of 4 Risk Priority: Critical Alert ID: 9476247.11602637.64747171

- Event:**
- FRD - Fraud, Scams, Swindles / ASC - Associated with, Seen with, 02/04/2011
U.S. Attorney Anne M. Tompkins announced that, James W. "Bill" Bailey, Jr. had his initial appearance on three federal criminal counts, Securities Fraud, Mail Fraud and Filing False Tax Returns Charges, which was filed in a Bill of Information in U.S. District Court in Asheville on February 1, 2010. The counts against Bailey charge that he engaged in a "Ponzi" scheme from about January 2000 to December 2010 to defraud investors of more than \$13 million. According to the Bill of Information, the defendant founded and operated Southern Financial Services Inc, 1031 Exchange Services, LLC and AVL Properties, LLC in Asheville. Court documents state that through Southern Financial Services Inc., Bailey fraudulently induced clients to deposit monies and purported to provide asset management, IRA accounts, and wills and trusts services., 02/04/2011, [DOJ US Attorneys Offices Press Releases 2009 to 2012](#)
 - SEC - SEC Violations (Insider Trading, Securities Fraud) / ASC - Associated with, Seen with, 02/04/2011
U.S. Attorney Anne M. Tompkins announced that, James W. "Bill" Bailey, Jr. had his initial appearance on three federal criminal counts, Securities Fraud, Mail Fraud and Filing False Tax Returns Charges, which was filed in a Bill of Information in U.S. District Court in Asheville on February 1, 2010. The counts against Bailey charge that he engaged in a "Ponzi" scheme from about January 2000 to December 2010 to defraud investors of more than \$13 million. According to the Bill of Information, the defendant founded and operated Southern Financial Services Inc, 1031 Exchange Services, LLC and AVL Properties, LLC in Asheville. Court documents state that through Southern Financial Services Inc., Bailey fraudulently induced clients to deposit monies and purported to provide asset management, IRA accounts, and wills and trusts services., 02/04/2011, [DOJ US Attorneys Offices Press Releases 2009 to 2012](#)
 - TAX - Tax Related Offenses / ASC - Associated with, Seen with, 02/04/2011
U.S. Attorney Anne M. Tompkins announced that, James W. "Bill" Bailey, Jr. had his initial appearance on three federal criminal counts, Securities Fraud, Mail Fraud and Filing False Tax Returns Charges, which was filed in a Bill of Information in U.S. District Court in Asheville on February 1, 2010. The counts against Bailey charge that he engaged in a "Ponzi" scheme from about January 2000 to December 2010 to defraud investors of more than \$13 million. According to the Bill of Information, the defendant founded and operated Southern Financial Services Inc, 1031 Exchange Services, LLC and AVL Properties, LLC in Asheville. Court documents state that through Southern Financial Services Inc., Bailey fraudulently induced clients to deposit monies and purported to provide asset management, IRA accounts, and wills and trusts services., 02/04/2011, [DOJ US Attorneys Offices Press Releases 2009 to 2012](#)

Alert Notes

Notes: Southern Financial Services, aka Southern Financial Services Inc., for fraudulently inducing clients to deposit monies and purported to provide asset management, IRA accounts, and wills and trusts services.

Source Information

RDC URL: <https://grid.rdc.com/wss/entity.html?entityId=c9fe552c3e68e6325d3f3d53eb346cc4>
Source Name: RiskConnect, 06/14/2017
Entity URL: <http://www.justice.gov/usao/ncw/press/billbailey.html>
Sources: DOJ US Attorneys Offices Press Releases 2009 to 2012, DOJ US Attorneys Offices Press Releases 2009 to 2012, <http://www.justice.gov/usao/offices/index.html>

Consistent with the terms and conditions of your RDC Subscriber Agreement, the information contained in this document is for alert purposes only and is not to be used for purposes of determining an individual's eligibility for any credit or any other FCRA permissible purposes. User further agrees to hold such material and information in strictest confidence, not to make use thereof other than for authorized purposes, to relate it only to employees requiring such information, and not to release or disclose it to any other party. The Alert information contained in this document may or may not pertain to the individual or entity referenced in your inquiry.

CONFIDENTIAL



DB12000P - Deutsche Bank Private Bank

Batch Date: 6/15/2017

Added to Monitoring: 06/15/2017

Alert Date: 6/15/2017

Alert

Organization: Southern Financial LLC
Address: Country: VIRGIN ISLANDS, U.S.
Tracking ID: KYC 1790655

Reporting ID:

Alerted Entity #: 4 of 4

Risk Priority: Critical

Alert ID: 9476247.11602637.63653446

Entity Information

Entity ID: 63653446
Riskid: R22433111
Entity Name: Southern Financial Group Inc.
Address: Summerville
Recent Event(s): • SEC - SEC Violations (Insider Trading, Securities Fraud) / ACC - Accuse, 12/15/2008
accused of running a so-called Ponzi scheme by soliciting cash from new investors to pay off redemptions to earlier investors, 12/15/2008, The Post and Courier (MCT)
Event: • SEC - SEC Violations (Insider Trading, Securities Fraud) / ACC - Accuse, 12/15/2008
accused of running a so-called Ponzi scheme by soliciting cash from new investors to pay off redemptions to earlier investors, 12/15/2008, The Post and Courier (MCT)

Alert Notes

Notes: Southern Financial Group Inc., was accused of running a so-called Ponzi scheme by soliciting cash from new investors to pay off redemptions to earlier investors.

Source Information

RDC URL: <https://grid.rdc.com/wss/entity.html?entityId=cd06df1e138aac735d3f3d53eb346cc4>
Source Name: RiskConnect, 06/14/2017
Sources: The Post and Courier (MCT), MEDIA Article,Headline:The Post and Courier, Charleston, S.C., On Business column, <http://global.factiva.com/en/du/article.asp?NAPC=S&AccessionNo=KRTCN00020081216e4cf00001>

Consistent with the terms and conditions of your RDC Subscriber Agreement, the information contained in this document is for alert purposes only and is not to be used for purposes of determining an individual's eligibility for any credit or any other FCRA permissible purposes. User further agrees to hold such material and information in strictest confidence, not to make use thereof other than for authorized purposes, to relate it only to employees requiring such information, and not to release or disclose it to any other party. The Alert information contained in this document may or may not pertain to the individual or entity referenced in your inquiry.

SDNY_GM_00058304 Page 9 of 9

CONFIDENTIAL