

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,

v.

THE REAL PROPERTY LOCATED AT 225 VALLEY ROAD, N.W., ATLANTA, FULTON COUNTY, GEORGIA; 1418 DRESDEN DRIVE, N.E., NUMBER A310, ATLANTA, DEKALB COUNTY, GEORGIA; 3464 PACES PLACE, N.W., ATLANTA, FULTON COUNTY, GEORGIA; 4536 EAST BROOKHAVEN DRIVE, ATLANTA, FULTON AND DEKALB COUNTIES, GEORGIA; 2385 HEATHER DRIVE, DECATUR, DEKALB COUNTY, GEORGIA; 48 SHINBONE COURT, PANAMA CITY BEACH, WALTON COUNTY, FLORIDA, 7 LA GARZA COURT, PANAMA CITY BEACH, WALTON COUNTY, FLORIDA; THE 2006 CESSNA CITATION XLS, MANUFACTURER'S SERIAL NUMBER 560-5623, BEARING REGISTRATION NUMBER N562VP; THE GIPPS AERO PARTY LIMITED MODEL GA8TC-320 BEARING TAIL NUMBER N68GA AND SERIAL NUMBER GA8-TC-320-12-187; THE EXTRA FLUGZEUGPRODUKTIONS UND MODEL EA300/LT BEARING TAIL NUMBER N330TY AND SERIAL NUMBER LT020; THE BLACK 2012

Civil Action No.

1:15-CV-2032-LMM

MERCEDES BENZ GL550 BEARING
VEHICLE IDENTIFICATION NUMBER
4JGBF8GE5CA785200 AND GEORGIA
TAG NUMBER PAK5506; THE SILVER
2012 SILVER MERCEDES BENZ SLS
AMG BEARING VEHICLE
IDENTIFICATION NUMBER
WDDRJ7HA1CA008056 AND
GEORGIA TAG NUMBER BXY3941;
THE BLACK 2013 AUDI SS QUATRO
BEARING VEHICLE IDENTIFICATION
NUMBER WAUD2AFD2DN020235
AND GEORGIA TAG NUMBER
PMC8546; AND ALL RIGHT, TITLE
AND INTEREST OF STERLING
CURRENCY GROUP, LLC, STERLING
ONLINE PROCESSING SERVICES,
LLC, GID PARTNERS, LLC, ALEX
CAPITAL HOLDINGS LLC,
LULLWATER HOLDINGS LLC,
CURTIS CREEK HOLDINGS, LLC,
VALLEY TRUST, LULLWATER TRUST,
TYSON RHAME, JAMES SHAW,
CAROLE LAURETTE SHAW,
AND/OR FRANK BELL IN ALEX
CAPITAL HOLDINGS LLC; STERLING
CURRENCY GROUP LLC, STERLING
ONLINE PROCESSING SERVICES
LLC, GID PARTNERS LLC, CURTIS
CREEK HOLDINGS LLC, LULLWATER
HOLDINGS LLC, VALLEY TRUST,
LULLWATER TRUST, SPRINGLAKE
TRADING, LLC, JS REAL ESTATE
INVESTMENTS, LLC, SR EQUIPMENT
LEASING, LLC, PRIMESTONE
PROPERTIES LLC, WINGOVER
CAPITAL LLC, NORTHWEST

CAPITAL LLC, THE TAR REVOCABLE TRUST, BROADWAY TRADER 4Z, LLC, YARDS AT NODA, LLC, SHERRILLS FORD HOLDINGS LLC, SCOTCH COVE, LLC, RG CLASSICS LLC, ISOLVEIT.COM LLC, STERLINGFUNDER LLC, TRINVEST LLC, SKY COMBAT BLUE LLC, TR EAST POINT REAL ESTATE LLC, TR INTERACTIVE TECHNOLOGIES LLC, POLARIS AVIATION LLC, SKY COMBAT RED LLC, CASCADES AT REA, LLC, ARROWOOD STATION HOLDINGS LLC, ARROWHEAD STATION HOLDINGS LLC, MIRACLE CHARTERS, LLC, TR REAL ESTATE LLC, WHISTLEJACKET, INC., J-BREM LLC, THERRELL FARMS ESTATES LLC, ZONOLITE HOLDINGS LLC, SUSTAINABILITY SOLUTIONS LLC, GVEST HOLDINGS LLC, GVEST PARTNERS LLC, GVEST CAPITAL LLC, 200WEST LAND DST, PRIMESTONE FIFECO REALTY FUND LLC, PREFERRED CAPITAL LLC, RECLAIM GROUP LLC, WINGOVER RANCH, LLC, SHAW CAPITAL & GUARANTY, LLC, SHAW IRREVOCABLE TRUST, SHAW ALYS BEACH LLC, TRINVEST PARTNERS, LLC, AND GID ASSOCIATES LLC.

AMENDED VERIFIED COMPLAINT FOR FORFEITURE

COMES NOW, the United States of America, the Plaintiff in this matter, by John A. Horn, Acting United States Attorney the Northern District of Georgia,

and Thomas J. Krepp and Jenny Turner, Assistant United States Attorneys, and files this Amended Complaint for Forfeiture. In support thereof, the United States shows the following:

I. Introduction

1. This Complaint seeks forfeiture of the below-listed properties to the United States as proceeds of specified unlawful activities and properties involved in money laundering offenses of Sterling Currency Group, LLC (“Sterling”); Sterling Online Processing Services, LLC (Sterling Online); GID Partners, LLC (GID); Alex Capital Holdings LLC (Alex); James Shaw (J.Shaw); Carole Laurette Shaw (C.Shaw); Tyson Rhame (Rhame); Frank Bell (Bell), and other entities controlled by these same businesses and individuals that have used the facilities of interstate commerce in a scheme to defraud investors in the Iraqi dinar by publishing and disseminating false information about the viability of that currency as an investment:

- a. The real property located at 225 Valley Road, N.W., Atlanta, Fulton County, GA 30305, and all buildings and appurtenances thereto (the Valley Road Property), described more particularly as follows:

**225 Valley Road, NW, Atlanta,
Fulton County, Georgia
Tax Parcel ID No.: 17-0116LL0675**

ALL THAT TRACT OR PARCEL OF LAND LYING AND BEING IN LAND LOT 116, 17TH DISTRICT, FULTON COUNTY, GEORGIA, BEING LOT 16 AND PART OF LOT 15,

BLOCK 6, ACCORDING TO THE PLAT FOR TUXEDO PARK CO., AND VALLEY ROAD CO., RECORDED AT PLAT BOOK 17, PAGE 60, FULTON COUNTY, GEORGIA RECORDS AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGIN AT THE INTERSECTION OF THE NORTHEASTERLY RIGHT-OF-WAY LINE OF VALLEY ROAD (A 50-FOOT RIGHT OF WAY) AND THE NORTHWESTERLY RIGHT-OF-WAY LINE OF TUXEDO ROAD (A 50-FOOT RIGHT-OF-WAY), SUCH INTERSECTION BEING THE "TRUE POINT OF BEGINNING", FROM SUCH TRUE POINT OF BEGINNING, RUN THENCE ALONG THE NORTHEASTERLY RIGHT-OF-WAY LINE OF VALLEY ROAD NORTH 46 DEGREES 13 MINUTES 13 SECONDS WEST A DISTANCE OF 125.21 FEET TO A POINT ON THE NORTHEASTERLY RIGHT-OF-WAY LINE OF VALLEY ROAD; RUN THENCE ALONG THE NORTHEASTERLY RIGHT-OF-WAY LINE OF VALLEY ROAD AND FOLLOWING THE CURVATURE THEREOF AN ARC DISTANCE OF 71.00 FEET TO A 1 INCH CRIMP TOP FOUND ON THE NORTHEASTERLY RIGHT-OF-WAY LINE OF VALLEY ROAD (SUCH ARC BEING SUBTENDED BY A CHORD BEARING NORTH 51 DEGREES 07 MINUTES 43 SECONDS WEST A CHORD DISTANCE OF 70.93 FEET AND HAVING A RADIUS OF 475.48 FEET); RUN THENCE NORTH 24 DEGREES 48 MINUTES 15 SECONDS EAST A DISTANCE OF 504.46 FEET TO A 1 INCH PIPE FOUND; RUN THENCE SOUTH 70 DEGREES 26 MINUTES 36 SECONDS EAST A DISTANCE OF 211.47 FEET TO A ONE INCH PIPE FOUND ON THE WESTERLY RIGHT-OF-WAY LINE OF TUXEDO ROAD; RUN THENCE ALONG THE WESTERLY RIGHT-OF-WAY LINE OF TUXEDO ROAD SOUTH 01 DEGREE 31 MINUTES 47 SECONDS WEST A DISTANCE OF 144.55 FEET TO A POINT ON THE WESTERLY RIGHT-OF-WAY LINE OF TUXEDO ROAD; RUN THENCE ALONG THE NORTHWESTERLY RIGHT OF

WAY LINE OF TUXEDO ROAD AND FOLLOWING THE CURVATURE THEREOF AN ARC DISTANCE OF 186.75 TO A POINT ON THE NORTHWESTERLY RIGHT-OF-WAY LINE OF TUXEDO ROAD (SUCH ARC BEING SUBTENDED BY A CHORD BEARING SOUTH 21 DEGREES 10 MINUTES 41 SECONDS WEST A CHORD DISTANCE OF 186.51 FEET AND HAVING A RADIUS OF 1,049.76 FEET); RUN THENCE ALONG THE NORTHWESTERLY RIGHT OF WAY LINE OF TUXEDO ROAD AND FOLLOWING THE CURVATURE THEREOF AN ARC DISTANCE OF 284.09 FEET TO THE INTERSECTION OF THE NORTHEASTERLY RIGHT OF WAY LINE OF VALLEY ROAD AND THE NORTHWESTERLY RIGHT OF WAY LINE OF TUXEDO ROAD AND THE TRUE POINT OF BEGINNING (SUCH ARC BEING SUBTENDED BY A CHORD BEARING SOUTH 44 DEGREES 09 MINUTES 02 SECONDS WEST A CHORD DISTANCE OF 278.57 FEET AND HAVING A RADIUS OF 414.81) SUCH PROPERTY IS MORE PARTICULARLY DELINEATED ON THAT CERTAIN BOUNDARY SURVEY (PLAT NO. 99-0470405 R) FOR ROBERT P. GUYTON, JR. AND EMILY W. GUYTON PREPARED BY WILLIAM W. DELOACH GRLS NO. 1711, OF PEARSON & ASSOCIATES, INC., DATED MAY 24, 1999;

- b. The real property located at 1418 Dresden Drive, N.E., Number A310, Atlanta, DeKalb County, Georgia, and all buildings and appurtenances thereto (the Dresden Property), described more particularly as follows:

**1418 Dresden Drive, NE, Unit A310
Atlanta, DeKalb County, Georgia
Tax Parcel ID No.: 18-238-18-072**

ALL THAT TRACT OR PARCEL OF LAND LYING AND BEING IN LAND LOT 238 OF THE 18TH DISTRICT OF DEKALB COUNTY, GEORGIA, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

CONDOMINIUM UNIT A-310 OF BUILDING A, THE CONDOMINIUMS AT VILLAGE PLACE BROOKHAVEN, A CONDOMINIUM, AS MORE PARTICULARLY DESCRIBED AND DELINEATED IN THE DECLARATION OF CONDOMINIUM FOR THE CONDOMINIUMS AT VILLAGE PLACE BROOKHAVEN, RECORDED IN DEED BOOK 21154, PAGE 494, ET SEQ., DEKALB COUNTY, GEORGIA RECORDS, AS MAY BE AMENDED, TOGETHER WITH ALL RIGHT, TITLE AND INTEREST IN THE COMMON ELEMENTS AS SET FORTH IN SAID DECLARATION.

THIS CONVEYANCE IS MADE SUBJECT TO THE DECLARATION AND ALL MATTERS REFERENCED THEREIN, ALL MATTERS SHOWN ON THE PLAT RECORDED IN CONDOMINIUM PLAT BOOK 209, PAGES 80-86, DEKALB COUNTY, GEORGIA RECORDS, AS MAY BE AMENDED, AND THE FLOOR PLANS RECORDED IN CONDOMINIUM FLOOR PLAN BOOK 209, PAGE 87, AFORESAID RECORDS, AS MAY BE AMENDED;

- c. The real property located at 3464 Paces Place, N,W., Atlanta, Fulton County, Georgia, and all buildings and appurtenances thereto (the Paces Place Property), described more particularly as follows:

3464 Paces Place, NW, Atlanta, Fulton County, Georgia
Tax Parcel ID No.: 17-019800030227

ALL THAT TRACT OR PARCEL OF LAND LYING AND BEING IN LAND LOT 198 OF THE 17TH DISTRICT, FULTON COUNTY, GEORGIA, BEING UNIT C-105 OF PACES PLACE CONDOMINIUM AS PER PLAT OF SURVEY MADE BY ERNEST L. BOGGUS, P.E. & L.S., DATED JUNE, 1966, AND SHOWN AS "PROPERTY OF MARGARET P. HITT" RECORDED IN CONDOMINIUM PLAT BOOK 1,

PAGES 2 AND 3, AND AS REVISED AND RECORDED IN CONDOMINIUM PLAT BOOK 1, PAGE 16, AFORESAID RECORDS, TOGETHER WITH ALL RIGHT, TITLE AND INTEREST CONTAINED IN DECLARATION OF PACES PLACE CONDOMINIUM RECORDED IN DEED BOOK 4461, PAGES 161-226, INCLUSIVE, AND AS AMENDED BY INSTRUMENT RECORDED IN DEED BOOK 4347, PAGE 295, AFORESAID RECORDS, SAID DECLARATION BY THIS REFERENCE BEING INCORPORATED HEREIN AND MADE A PART HEREOF. THE INTEREST HEREIN CONVEYED INCLUDES WITHOUT LIMITING THE GENERALITY OF THE FOREGOING, AN UNDIVIDED 2.776 PERCENT INTEREST IN THE COMMON AREAS AND FACILITIES OF SAID CONDOMINIUM.

- d. The real property located at 4536 East Brookhaven Drive, Atlanta, Fulton and DeKalb Counties, Georgia, and all buildings and appurtenances thereto (the Brookhaven Property), described more particularly as follows:

**4536 East Brookhaven Drive, NE, a/k/a 3060 Mabry Road
Atlanta, Fulton and DeKalb Counties, Georgia
Fulton County Tax Parcel ID No.: 17-001300020262
DeKalb County Tax Parcel ID No.: 18-275-02-001**

ALL THAT TRACT OR PARCEL OF LAND LYING AND BEING IN LAND LOT 13 OF THE 17TH DISTRICT, FULTON COUNTY, GEORGIA, AND LAND LOT 275 OF THE 18TH DISTRICT, DEKALB COUNTY, GEORGIA, BEING LOT 2 OF THE C.H. WATFORD PROPERTY, AS PER PLAT RECORDED IN PLAT BOOK 20, PAGE 107, DEKALB COUNTY RECORDS, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE INTERSECTION OF THE NORTH SIDE OF EAST BROOKHAVEN DRIVE WITH THE NORTHWESTERN SIDE OF MABRY DRIVE (ROAD), IF

SAID STREET LINES WERE EXTENDED TO FORM AN ANGLE INSTEAD OF A CURVE; RUNNING THENCE WESTERLY ALONG THE NORTH SIDE OF EAST BROOKHAVEN DRIVE 94.2 FEET TO AN IRON PIN AT THE SOUTHEAST CORNER OF LOT 1, SAID SUBDIVISION; RUNNING THENCE NORTHWESTERLY ALONG THE LINE DIVIDING LOT 1 AND LOT 2, SAID SUBDIVISION, 206.5 FEET TO LOT 3, SAID SUBDIVISION; RUNNING THENCE SOUTHEASTERLY ALONG THE LINE WHICH DIVIDES LOT 2 AND LOT 3, SAID SUBDIVISION, 220.0 FEET TO THE NORTHWESTERN SIDE OF MABRY DRIVE (ROAD); RUNNING THENCE SOUTHWESTERLY 200.0 FEET TO THE NORTH SIDE OF EAST BROOKHAVEN DRIVE AND THE POINT OF BEGINNING, BEING IMPROVED PROPERTY KNOWN AS 4536 EAST BROOKHAVEN DRIVE, ACCORDING TO THE PRESENT SYSTEM OF NUMBERING HOUSES IN THE CITY OF ATLANTA AND FULTON AND DEKALB COUNTIES;

- e. The real property located at 2385 Heather Drive, Decatur, DeKalb County, Georgia, and all buildings and appurtenances thereto (the Heather Drive Property), described more particularly as follows:

2385 Heather Drive
Decatur, DeKalb County, Georgia 30033-2701
Tax Parcel ID Number: 18 113 09 015

ALL THAT TRACT OR PARCEL OF LAND LYING AND BEING IN LAND LOT 113 OF THE 18TH DISTRICT OF DEKALB COUNTY, GEORGIA, BEING LOT 15, BLOCK G, ADDITION NO. 5 OF LEAFMORE HILLS SUBDIVISION, ACCORDING TO PLAT RECORDED AT PLAT BOOK 25, PAGE 150, DEKALB COUNTY RECORDS, WHICH PLAT IS HEREBY REFERRED TO AND MADE A PART OF THIS DESCRIPTION, BEING KNOWN AS 2385 HEATHER DRIVE,

ACCORDING TO THE PRESENT SYSTEM OF NUMBERING
HOUSES IN DEKALB COUNTY, GEORGIA.

- f. The real property located at 48 Shinbone Court, Alys Walton Beach, Walton County, Florida, and all buildings and appurtenances thereto (the Shinbone Property), described more particularly as follows:

**48 Shinbone Court, Panama City Beach,
Walton County, Florida
Tax Parcel ID No.: 27-3S-18-16420-0JJ-0150**

LOT 15, BLOCK JJ, ALYS BEACH PHASE 2B, ACCORDING TO THE PLAT THEREOF, AS RECORDED IN PLAT BOOK 16, PAGES 81 AND 81A, OF THE PUBLIC RECORDS OF WALTON COUNTY, FLORIDA.;

- g. The real property located at 7 La Garza Court, Alys Walton Beach, Walton County, Florida, and all buildings and appurtenances thereto (the La Garza Property) described more particularly as follows:

**7 La Garza Court, Panama City Beach,
Walton County, Florida
Tax Parcel ID No.: 27-3S-18-16420-0NN-0060**

LOT 6, BLOCK NN, ALYS BEACH PHASE 2B, ACCORDING TO THE MAP OR PLAT THEREOF, AS RECORDED IN PLAT BOOK 16, PAGES 81 AND 81A, OF THE PUBLIC RECORDS OF WALTON COUNTY, FLORIDA;

- h. The 2006 Cessna Citation XLS, Manufacturer's Serial Number 560-5623, bearing registration number N562VP (the Cessna);

- i. The Gipps Aero Party Limited Model GA8TC-320 bearing tail number N68GA and serial number GA8-TC-320-12-187 (the Gipps Aero);
- j. The Extra Flugzeugproduktions Und Model EA300/LT bearing tail number N330TY and Serial Number LT020 (the Extra);
- k. The black 2012 Mercedes Benz GL550 bearing vehicle identification number 4JGBF8GE5CA785200 and Georgia tag number PAK5506(the Black Mercedes);
- l. The silver 2012 silver Mercedes Benz SLS AMG bearing vehicle identification number WDDRJ7HA1CA008056 and Georgia tag number BXY3941(the Silver Mercedes);
- m. The black 2013 Audi SS Quattro bearing vehicle identification number WAUD2AFD2DN020235 and Georgia tag number PMC8546 (the Black Audi);
- n. All right, title and interest of Sterling, Sterling Online, GID, Alex Capital Holdings LLC (Alex); Lullwater Holdings LLC (Lullwater); Curtis Creek Holdings, LLC (Curtis Creek); Valley Trust; Lullwater Trust, Rhame, J.Shaw, C.Shaw, and/or Bell in the following:
 - i. Sterling;
 - ii. Sterling Online;
 - iii. GID;
 - iv. Alex;

- v. Lullwater Holdings;
- vi. Lullwater Trust;
- vii. Curtis Creek;
- viii. Valley Trust;
- ix. Springlake Trading, LLC (Springlake Trading);
- x. JS Real Estate Investments, LLC (JS Real Estate Investments);
- xi. SR Equipment Leasing, LLC (SR Equipment Leasing);
- xii. Primestone Properties LLC (Primestone Properties);
- xiii. Wingover Capital LLC (Wingover Capital);
- xiv. Northwest Capital LLC (Northwest Capital);
- xv. The TAR Revocable Trust (TAR);
- xvi. Broadway Trader 4Z, LLC (Broadway Trader);
- xvii. Yards at Noda, LLC (Yards at Noda);
- xviii. Sherrills Ford Holdings LLC (Sherrill's Ford);
- xix. Scotch Cove, LLC (Scotch Cove);
- xx. RG Classics LLC (RG Classics);
- xxi. Isolveit.com LLC (Isolveit);
- xxii. Sterlingfunder LLC (Sterlingfunder);
- xxiii. Trinvest LLC (Trinvest);
- xxiv. Sky Combat Blue LLC (Sky Combat Blue);
- xxv. TR East Point Real Estate LLC (TR East Point);
- xxvi. TR Interactive Technologies LLC (TR Interactive Technologies);
- xxvii. Polaris Aviation LLC (Polaris Aviation);
- xxviii. Sky Combat Red LLC (Sky Combat Red);
- xxix. Cascades at Rea, LLC (Cascades at Rea);
- xxx. Arrowood Station Holdings LLC (Arrowood Station Holdings);
- xxxi. Arrowhead Station Holdings LLC (Arrowood Station Holdings);
- xxxii. Miracle Charters, LLC (Miracle Charters)
- xxxiii. TR Real Estate LLC (TR Real Estate);
- xxxiv. Whistlejacket, Inc. (Whistlejacket);
- xxxv. J-Brem LLC (J-Brem);
- xxxvi. Therrell Farms Estates LLC (Therrell Farms Estates);
- xxxvii. Zonolite Holdings LLC (Zonolite Holdings);

- xxxviii. Sustainability Solutions LLC (Sustainability Solutions);
- xxxix. Gvest Holdings LLC (Gvest Holdings);
 - xl. Gvest Partners LLC (Gvest Partners);
 - xli. Gvest Capital LLC (Gvest Capital);
 - xlii. 200West Land DST (200 West Land);
 - xliii. Primestone FifeCo Realty Fund LLC (Primestone-FifeCo);
 - xliv. Preferred Capital LLC (Preferred Capital);
 - xlv. Reclaim Group LLC (Reclaim Group);
 - xlvi. Wingover Ranch, LLC (Wingover Ranch);
 - xlvii. Shaw Capital & Guaranty, LLC (Shaw Capital and Guaranty);
 - xlviii. Shaw Irrevocable Trust (Shaw Irrevocable Trust);
 - xlix. Shaw Alys Beach LLC (Shaw Alys Beach);
 - 1. Trinvest Partners, LLC (Trinvest Partners); and
 - li. GID Associates LLC (GID Associates).

(collectively the Defendant Properties).

2. Based on the evidence described below, the Defendant Properties are subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) as proceeds of specified unlawful activity traceable directly and indirectly to violations of 18 U.S.C. §§ 1341, 1343, 1349, 1956, and 1957.

3. Additionally, the Defendant Properties are subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) as property involved in money laundering offenses in violation of 18 U.S.C. §§ 1956 and 1957.

4. This Court has jurisdiction over this action and the claims raised herein by virtue of 28 U.S.C. §§ 1345 and 1355(a).

5. Venue is proper in the Northern District of Georgia as to the Valley Road Property, the Dresden Property, the Paces Place Property, the Brookhaven Property, the Heather Drive Property, the Black Mercedes, the Silver Mercedes, and

the Black Audi because those properties are located and remain herein. *See* 28 U.S.C. §§ 1395(a) and (b).

6. Additionally, venue is proper in the Northern District of Georgia as to all of the Defendant Properties because acts in furtherance of the conspiracies and substantive offenses alleged above occurred herein and because the offenses subjecting that property are properly chargeable in the Northern District of Georgia. *See* 28 U.S.C. §§ 1355 (b) and 1395(a) and (b).

II. Facts Giving Rise to Forfeiture

A. The Business of Sterling Currency Group

7. Since at least 2004, Sterling Currency Group, LLC (“Sterling”), an Atlanta, Georgia-based business that also does business under the name Dinar Banker, has become one of the largest sellers of Iraqi dinar in the United States. While Sterling also offers the sale of what its website calls “other exotic currencies,” including the Vietnamese Dong, Indonesian Rupiah, Afghani, and Chinese Yuan, the bulk of Sterling’s business comes from the sale of the Iraqi dinar.

8. Sterling is one of several money service businesses in the United States that purchases the Iraqi dinar abroad for sale to customers in the United States and Canada.

9. Sterling purchases its inventory of dinar notes from exchangers in the Middle East, transports the notes in bulk to the United States via commercial carrier, retrieves the notes from Hartsfield Jackson International Airport, and trucks them

for storage to a business location in Atlanta, Georgia, where they remain available to fill customer orders placed on its websites (initially at www.dinarbanker.com and now at www.sterlingcurrencygroup.com) and over the telephone.

10. Sterling operates in partnership with Sterling Online Processing (“Sterling Online”), which provides administrative services for Sterling, as well as GID Partners (“GID Partners”), which is an Iraqi dinar exchanger purchased by Sterling.

11. Tyson Rhame (Rhame) and James Shaw (J.Shaw) are the co-owners and co-founders of Sterling. Rhame and Shaw share ownership of Sterling through their respective interests in several corporations, including Alex Capital Holdings (“Alex”), Lullwater Holdings (“Lullwater”), and Curtis Creek Holdings (“Curtis Creek”) as well as the trusts “Valley Trust” and “Lullwater Trust.”

12. Carol Laurette Shaw (C.Shaw) is married to J. Shaw and is also a co-owner of Sterling through her interests in Alex, Curtis Creek, and Valley Trust. As recently as 2011, C.Shaw played an active role in Sterling’s operations.

13. Frank Bell (Bell) began working for Sterling in 2010 and is presently Sterling’s Chief Operating Officer (COO). Bell presently runs the day-to-day affairs of Sterling.

14. Since at least 2010, Rhame, J.Shaw, C.Shaw, and Bell have shared control of Sterling’s operations.

B. Knowledge of the Scam

15. Sterling's success is at least partially attributable to its use of the facilities of interstate commerce, including wire communications, both directly and indirectly, to disseminate false and misleading information about the possibility of a revaluation of the dinar and to steer customers toward choosing Sterling over its competitors.

16. The revaluation (or simply, "RV") theory has spread throughout the Internet and is promoted by a variety of internet blogs and individuals who hold themselves out to be currency experts or "dinar gurus." According to the RV theory, the dinar will experience an abrupt, exponential rise in value against the U.S. dollar and hence yield enormous profits for dinar holders.

17. An individual who worked for Sterling from approximately 2013 to 2015 confirmed that Bell at one point told customer service center representatives in a meeting that there would never be an Iraqi dinar revaluation. Bell instructed the representatives not to tell callers that the revaluation will never occur but to tell the callers to do their own research.

18. Email communications between Rhame, J.Shaw, C.Shaw, and Bell confirm that these individuals know that the concept of the dinar revaluation is a scam.

- a. For instance, C.Shaw sent an October 20, 2010, email to Rhame that stated, in part, "I cant [sic] watch these folks be so stupid" and then stated "3 orders all for 100,000 at 200 each and 1 order

for 10 notes at 330 shipping overnight each at 43.00 and to the same address.”

- b. On November 3, 2010, J.Shaw sent an email to Rhame entitled, “Discussion Point,” an email that he also forwarded to C.Shaw, which read, in part:

Ty,

The point of my call was not to talk about net worth. We have a business that I valued at \$8-10 million in that formula (SCG). Laurette and I do not think about how much is hers and mine as you do in your relationship (like I should give her 99% of profits). We are 50-50 partners on everything and if we ever split up we would divide all assets as such. She has lately been very nervous and was crying last night because she knows we are running an illegal operation.

The point is that her [sic] and I have worked way too hard in life for us to risk everything based on your belief (even if I agree with you) that the Iraqi dinar will not RV and it is ok to make millions of dollars in false promises to our customers. Not only are we risking everything we own, we are risking serious jail time as promoters of a ponzi scheme. . .

Jim

19. A series of emails sent on November 30, 2010, further shows knowledge and intent.

- a. On that date, Rhame sent an email to J.Shaw that J.Shaw then forwarded to C.Shaw, which read in part, “Our business is chicken shit and we got CRUSHED in a conference call on

Sunday night---not because of anything said against us, but because we operate small minded and haven't been growing. We are not a real company. . . . I got beat up in a conference call again last night because of our limited growth.”

- b. J.Shaw’s response to Rhame, one that he forwarded to C.Shaw, stated, in part, “Laquettes [sic] job is just as important as yours. I am sick of seeing her work most days and nights just to have you pretend to be doing so much more than anyone.” The email also stated, “I am not sure how much bigger this business needs to be until it can be managed properly. We are at risk for lawsuits and other problems. We are not selling Coca Cola.”
- c. On that same date, another email from J.Shaw to Rhame, one that J.Shaw ultimately forwarded to C.Shaw more than a year later on December 20, 2011, read as follows:

Ty,

The more I think of your bullshit emails the more it disgusts me. I bankrolled this entire business at its inception by putting up 80% of initial capital (500/630). Throw in Zurich and I bankrolled 95% of all finances. Laurette has done at least 50% of the work and I was instrumental in our website and getting the business growing. Our agreement was that you and Laurette would work the business. How much work has Bonnie done? AS SOON AS THE BUSINESS STARTS TO DO REALLY WELL, YOU START THROWING OUT YOUR CONTROL FREAK EMAILS. Maybe you should just say thanks versus the shit I am hearing from you.

FYI: Laurette and I are concerned about getting letters to you thanking you for helping them with their hospital with their purchase of \$20k for a \$200k layaway and other similar letters. We are not Charlatans and I do not like making money under false pretenses. I DONOT [sic] WANT TO BE ALI. Our life is happy without swindling people.”

20. Additionally, a March 22, 2011, set of emails further shows that Rhame and C.Shaw were aware of Sterling’s wrongdoing.

- a. Specifically, on that date, Rhame sent C.Shaw an email that copied J.Shaw with the subject, “Comments related to AMENDED Operating Agreement” in which he asserted, “This amendment is complete bullshit written for the purpose of obtaining banking. Jim and Ty are operation [sic] under the original partnership agreement. We are 50% partners and his ass will go to prison if mine does.”
- b. Thereafter, C.Shaw replied, “and won't your asses have an interesting time there. NOT.”

21. Likewise, on August 6, 2012, J.Shaw sent Bell an email with the subject line, “not great article,” that contained a hyperlink to a news article entitled, “You Can’t Fix Stupid – The Iraqi Dinar Scam Lives.”

C. Sterling’s Unlawful Business Practices

22. Sterling’s unlawful business practices fall into at least two categories. First, Sterling unlawfully used at least one revaluation promoter to disseminate false

information and steer prospective dinar purchasers toward Sterling. Second, Sterling used telephone conversations and its own web site to make false representations and false promises to its customers.

i. Sterling's Use of the RV Promoters' Web Sites

23. Sterling has knowingly benefitted from false representations made by web sites and blogs, including "The GET Team."

24. The GET Team, which is led by an individual known as TerryK, runs an internet chat room and weekly conference calls in which information about the Iraqi dinar is discussed. During those chats and conferences, TerryK spreads false information suggesting that the revaluation is about to occur.

25. In a September 13, 2010, email, TerryK introduced himself to Rhame:

Ty, My name is TerryK, I own the worlds [sic] largest Dinar web site going....we have currently 7200 members and currently we hold two calls a week with about 1500 on the call and 100's if not 1,000's on skype listening in...what I would like to do is open a discussion with you and maybe have you on a call this coming wed night. It starts at 9pm and thought maybe 10-15 min on how you operate, how to cash in with your firm and then a question and answers session....let me know via email [sic].

terryk.

26. Thereafter, beginning at least as early as 2011, Sterling began making monthly payments in the amount of \$4,000 to TerryK. In total, Sterling has paid TerryK more than \$150,000 since 2011.

27. Since TerryK's 2010 email, Sterling employees, including Bell and Rhame, have routinely spoken on the GET Team's weekly conference calls. For example,

on the May 27, 2015, GET Team conference call, Bell stated that Sterling would be offering a “fire sale” in early June 2015. During this conference call, TerryK stated that listeners should purchase currency from Sterling, that he trusted his friends “Ty” and “Frank” at Sterling, and that he had so much trust in Bell that he would be comfortable giving Bell his bank account information.

28. In the GET Team chat room and during the weekly conference calls, TerryK also passed along false information purportedly received from sources about the revaluation of the Iraqi dinar and other currencies (such as the Vietnamese dong).

- a. For example, on the January 8, 2014, conference call, TerryK stated that a source at Wells Fargo said that it would take at most 10 to 15 minutes to process the exchange of Iraqi dinar.
- b. Additionally, on the March 12, 2014, conference call, TerryK stated that a source at Wells Fargo had told him “it” was supposed to happen but that the time kept changing.
- c. Likewise, on the April 16, 2014, conference call, TerryK said that he had heard from the “UST,” a reference to the U.S. Department of Treasury, that the rate was good and that everything would be released that week.

29. On June 3, 2015, TerryK acknowledged during an interview with the Federal Bureau of Investigation (FBI) that he had fabricated source information on GET Team online postings and conference calls.

30. In fact, the U.S. Department of Treasury is not preparing and has never prepared for an Iraqi dinar revaluation.

31. Similarly, Wells Fargo does not trade in the Iraqi dinar and also warns its customers not to invest in it. In fact, a publicly available Wells Fargo Advisors Memorandum dated March 10, 2014, states that Wells Fargo is not preparing for an Iraqi dinar revaluation and has no plans whatsoever to exchange the Iraqi dinar.

32. Moreover, a November 7, 2011, email exchange between TerryK, Rhame and Bell confirms that TerryK and Sterling have sought to keep the specific nature of their relationship secret.

- a. On that date, TerryK sent an email to Rhame and Bell that read:
“I want to make sure that our arrangement is between us and no one else...As no one else needs to know about our arrangement... Please confirm...
Thanks for all you guys do... [sic]”
- b. Bell’s reply, sent that same day, read, “Absolutely noone [sic] but us [sic].”

33. Although on May 28, 2015, Bell represented to the FBI during an interview that Sterling maintains a “firewall” between itself and revaluation promoters, email records belie his assertions.

- a. For instance, on May 2, 2012, TerryK sent an email to Bell that read as follows:

You should have gotten a lot of business on the reserves the past week, been pushing it hard on the site bro.....make sure TY is not selling dinar from the middle table that one is mine.....[sic]"

Bell's reply, sent the following day, read, "TK, Will do, thanks for your support."

b. Likewise, on March 11, 2013, TerryK sent Bell an email that read,

FYI Received payment today, thanks for following up..What else can I do to help sales for your team? Just let me know buddy, I will be in the room later today to get some things moving as well [sic].

c. Also, on July 22, 2013, TerryK sent Bell an email reading as follows:

Frank, please find attached the banner invoice for the month of August 2013, I trust things are going well, as we keep promoting the heck out of Sterling.. [sic] If there is anything you need let me know.

34. On June 3, 2015, Bell acknowledged to FBI agents that Sterling should not have continued to do business with the dinar promoters.

ii. False Representations and Promises on Sterling's Website

35. Sterling's business practices have included publishing information on its own website that its principals knew to be untrue and disseminating false information over the telephone.

36. For instance, though Sterling's website now warns customers that "Sterling Currency Group / DinarBanker is not an accredited financial consultant" and that "that the value of the currency may go down or go up depending on circumstances

beyond our control,” in 2010, Sterling, used its former website, www.dinarbanker.com, to suggest that a revaluation could occur in the near future.

37. Furthermore, on of December 27, 2010, Sterling’s website displayed an article titled “Iraqi Dinar Revaluation” that cited Tyson Rhame as its primary source and that stated, in part:¹

To put it simply, the Iraqi Dinar is currently worth less than 1/10th of a US penny (Approximately \$1000 US dollars buys 1 million Iraqi Dinar). Historically, the Iraqi Dinar has been worth over 3 US dollars for every Iraqi Dinar (Over \$3,000,000 US dollars purchased 1 million Iraqi Dinar). Put another way, 1 million Iraqi Dinar is currently worth a little less that 1000 US dollars and historically 1 million Iraqi Dinar has been worth well over \$3,000,000.00 US dollars. So, the question is: **Will the Iraqi Dinar increase in value? And if so, how? And when?**

* * * *

The bottom line is that the Iraqi Dinar is currently at an extremely low valuation compared to the US Dollar. The currency has steadily increased in value since inception in late 2003. **Iraq is a country with phenomenal wealth potential; and additionally, has the backing and support of the major political and economic powers of the world.** There currently seems to be minimal risk that the Iraqi Dinar will decrease in value. The tremendous potential upside return compared to the minimal downside risk seems to make the Iraqi Dinar a compelling investment opportunity worth investigating.

* * *

In determining when the Iraqi Dinar will increase in value, all indicators point toward something happening in the near future (next 12 months) if not the very near future (next 3

¹ All emphases are in the original material.

months). The appreciation of the Iraqi Dinar has been unprecedentedly flat over the past 8 months despite low Iraqi inflation and a weakening US economy and US dollar. The Iraqi economy has been on a continual surge of economic growth for the past couple of years as Iraq has continued to stabilize and rebuild. The news coming out of Iraq from numerous returning military members with various reliable sources indicates a rapid move and increase in valuation occurring prior to, or in conjunction with US troop reductions. Indicators also point to an increase in the Iraqi Dinar exchange rate occurring prior to, or shortly after Iraqi elections. It appears that administratively, the IMF, WTO, and other world financial entities are working in close conjunction with the Iraqi Government to bring Iraq's financial system online with the rest of the world. The expectation is that the Iraqi Dinar will soon be freely traded through banks worldwide---further accelerating their recovery and economy, and adding to overall stability.

* * *

To answer the question of 'How' and 'How high?' the Iraqi Dinar will reevaluate, some speculation is in order. Based on historical precedents, an initial sudden significantly (overnight/over weekend) high revaluation seems very possible. **This initial move could be anywhere along the entire spectrum of rumored possibilities from \$.01 to \$1.49. After this initial revaluation, it seems likely there will be numerous significant incremental increases in valuation over a period of time.** This continual increase in value after an initial base valuation will prevent an overwhelming surge on the world financial system. By incrementally increasing the value of the dinar, it will limit the number and amount of Iraqi Dinar exchanges as many investors and currency traders will choose to hold their Iraqi Dinar or purchase more as they anticipate further valuation increases. In other words, a steady increase in the value of the Iraqi Dinar will create a free flowing market as some investors cash-out, others hold on, and others purchase Iraqi Dinar for the first time.

38. In contrast, since that time, Bell has told FBI agents that he believes that the Iraqi dinar will never revalue. In a May 28, 2015, interview with the FBI, Bell explained that based upon his education and experience with international finance, he believes that the Iraqi dinar will never be revalued to the extent that dinar promoters commonly claim. Furthermore, in a June 3, 2015, interview with the FBI, Bell used the term “mythology” when discussing the concept of an Iraqi dinar revaluation.

39. In 2010, Sterling’s website also represented that following the revaluation, customers would be able to exchange their Iraqi dinars at kiosks or “remote satellite offices” located at airports around the country.

40. Postings to Sterling’s website are illustrative.

- a. For instance as of January 3, 2010, Sterling’s website displayed an article titled, “Complete Guide To Exchanging Iraqi Dinar After Revaluation” that stated, in part,

Dinar Banker has the ability to set up secure remote satellite offices at numerous airport locations nationwide within 24 hours. They have a long history of transporting and securing currency all over the world through their global operations and are prepared for any exchange needs.²

- b. Similarly, as of October 21, 2010, Sterling’s website displayed an article titled, “Iraqi Dinar Exchange Locations” that stated, in part:

² Emphasis in original.

DinarBanker will have secure remote satellite offices set up at numerous airport locations nationwide as soon as possible in the event of a revaluation. You will not have to go through security in the airport exchange locations - You can simply come in with Dinar in a briefcase or luggage and come to the exchange location set up in the office area of each airport. We will have de la Rue machines to quickly count and verify your Dinar and all equipment needed to perform fast and secure wire transfers.

- c. That same article then represented that the “Current Exchange Locations” that Sterling planned “in the Event of an RV include[d]:”

City, State - Airport Code

Atlanta, GA - ATL
Boston, MA - BOS
Chicago, IL - ORD
Cincinnati, OH - CVG
Dallas / Forth Worth, TX - DFW
Denver, CO - DEN
Detroit, MI - DTW
Houston, TX - IAH
Las Vegas, NV - LAS
Los Angeles, CA - LAX
Miami, FL - MIA
Minneapolis, MN - MSP
New Orleans, LA - MSY
New York, NY - JFK
Phoenix, AZ - PHX
Salt Lake City, UT - SLC
San Francisco, CA - SFO
Seattle, WA - SEA
St. Louis, MO - STL

Tampa, FL - TPA
Washington, DC - DCA (Ronald Reagan)
Washington, DC - IAD (Dulles)

International Locations

Calgary, Canada - YYC
Vancouver, Canada - CYVR
Toronto, Canada - CYXZ
San Juan, Puerto Rico

41. In 2010, Rhame told a Sterling customer over the telephone that Sterling would open a kiosk at John F. Kennedy International Airport in New York following the revaluation to exchange Iraqi dinars for U.S. dollars.

42. Despite these representations, a former Sterling employee has confirmed that Sterling never had any arrangements with airports to operate remote satellite offices or kiosks. Furthermore, representatives from three of the above-listed airports have confirmed that Sterling never had arrangements to operate remote satellite offices or kiosks.

III. The Money Laundering Scheme

43. Sterling's customers pay for their purchases via eChecks, wire transfers, cashier's checks, official bank checks, certified checks, money orders, and Collect on Delivery, and Sterling ships the dinar notes to the purchaser in interstate commerce.

44. Sterling's revenues have been considerable, for since 2004, Sterling has earned over \$600 million in gross sales or receipts.

- a. Between 2004 and 2011, Sterling reported the following gross receipts:

Year	Gross receipts
2004	\$4,932,065
2005	\$4,827,368
2006	\$1,061,127
2007	\$4,899,750
2008	\$18,105,972
2009	\$13,506,661
2010	\$25,932,324
2011	\$245,411,774

- b. In 2012 and 2013, when Alex, Sterling's parent entity, reported Sterling's revenues, gross receipts reached the following totals:

Year	Gross receipts
2012	\$126,465,731
2013	\$109,169,253

- c. Sterling's gross revenues between January and September 2014 totaled approximately \$85,602,807.

45. As described below, once Sterling received payments from its customers, it, Sterling Online, GID, Alex, Lullwater, Lullwater Trust, Curtis Creek, Valley Trust, Rhame, J.Shaw, C.Shaw, and Bell engaged in financial and monetary transactions in tainted funds that diffused proceeds of the fraud scheme throughout a complex network of accounts held in the names of a myriad of trusts and business entities in addition to individuals, often in amounts of more than \$10,000, with intent to promote the unlawful fraud scheme and for the purpose of concealing and disguising the nature, source, location, ownership, and control of those proceeds.

46. Below is a list of accounts used in furtherance of the money laundering scheme:

Bank Name	Account #³	Held in the Name of	Authorized Signatories	Date Opened	Referenced hereinafter as
Actors Federal Credit Union	XXXX01-74	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #1-74
Actors Federal Credit Union	XXXX01-75	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #1-75
Actors Federal Credit Union	XXXX01-76	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #1-76
Actors Federal Credit Union	XXXX01-99	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #1-99

³ Although full account numbers and the names of minors and third parties have been redacted to comply with the local rules, the United States will file a Motion seeking the Court's permission to file the above spreadsheet without the redactions under seal so that the record is complete.

Bank Name	Account #³	Held in the Name of	Authorized Signatories	Date Opened	Referenced hereinafter as
Actors Federal Credit Union	XXXX02-74	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #2-74
Actors Federal Credit Union	XXXX02-75	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #2-75
Actors Federal Credit Union	XXXX02-76	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #2-76
Actors Federal Credit Union	XXXX02-99	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #2-99
Bank of America	XXXXXXXX3681	Web Stormz, LLC	Redacted	11/4/2011	BOA #3681
Bank of America	XXXXXXXX4406	Web Stormz, LLC	Redacted	5/28/2014	BOA #4406
Chelsea Bank	XXXXX5493	Sterling Currency Group LLC dba GID Associates	Frank Bell	10/08/2013	CHEL #5493
Chelsea Bank	XXXXX9734	Sterling Currency Group LLC	Tyson Rhame Frank Bell	02/19/2014	CHEL #9734
Fifth Third Bank	XXXXXX9640	Sterling Currency Group LLC	Tyson Rhame James Shaw Carole Shaw	01/24/2011	FTB #9640
Goldman Sachs and Co.	XXX-XX113-9	Spring Lake Trading LLC	James Shaw	08/18/2014	GS #113-9
J.P. Morgan Chase	XXX-X9613	JS Real Estate Investments LLC	James Shaw	Unknown	JPMC #9613
J.P. Morgan Chase	XXX-X9626	Lullwater Holdings, LLC	Tyson Rhame	Unknown	JPMC #9626
Mahopac National Bank	XXXXXX8418	Sterling Currency Group	Tyson Rhame Frank Bell	5/1/2012	MNB #8418
Merrill Lynch	XXX-X0471	James Shaw	James Shaw Carole Shaw	4/20/2012	ML #0471
Merrill Lynch	XXX-X0478	James Shaw custodian for E.S.	James Shaw	4/20/2012	ML #0478
Merrill Lynch	XXX-X0479	James Shaw custodian for A.S.	James Shaw	4/20/2012	ML #0479

Bank Name	Account #³	Held in the Name of	Authorized Signatories	Date Opened	Referenced hereinafter as
Merrill Lynch	XXX-X0480	James Shaw custodian for C.S.	James Shaw	4/20/2012	ML #0480
Merrill Lynch	XXX-X0488	James & Carole Shaw	James Shaw Carole Shaw	4/20/2012	ML #0488
Merrill Lynch	XXX-X1015	Tyson Rhame	Tyson Rhame	01/01/2014	ML #1015
Merrill Lynch	XXX-X2048	Curtis Creek Holdings, LLC	James Shaw	4/24/2012	ML #2048
Merrill Lynch	XXX-X2049	Alex Capital Holdings, LLC	Tyson Rhame James Shaw	4/24/2012	ML #2049
Merrill Lynch	XXX-X2050	JS Real Estate Investments, LLC	James Shaw	4/24/2012	ML #2050
Merrill Lynch	XXX-X2062	Lullwater Holdings, LLC	Tyson Rhame	5/6/2012	ML #2062
Merrill Lynch	XXX-X2065	Curtis Creek Holdings, LLC	James Shaw	6/27/2012	ML #2065
Merrill Lynch	XXX-X2066	Curtis Creek Holdings, LLC	James Shaw	6/27/2012	ML #2066
Merrill Lynch	XXX-X2072	Curtis Creek Holdings, LLC	James Shaw	6/27/2012	ML #2072
Merrill Lynch	XXX-X2087	Curtis Creek Holdings, LLC	James Shaw	6/26/2012	ML #2087
Merrill Lynch	XXX-X2089	Curtis Creek Holdings, LLC	James Shaw	6/26/2012	ML #2089
Merrill Lynch	XXX-X2386	SR Equipment Leasing, LLC	James Shaw Tyson Rhame	12/5/2013	ML #2386
Merrill Lynch	XXX-X2391	Primestone Properties, LLC	James Shaw	7/1/2014	ML #2391
Merrill Lynch	XXX-X2421	Springlake Trading, LLC	James Shaw	8/12/2014	ML #2421
Merrill Lynch	XXX-X2426	SR Equipment Leasing LLC	Tyson Rhame James Shaw	11/29/2014	ML #2426
Merrill Lynch	XXXX3224	Wingover Capital	James Shaw	Unknown	ML #3224

Bank Name	Account #³	Held in the Name of	Authorized Signatories	Date Opened	Referenced hereinafter as
Merrill Lynch	XXXX3225	Northwest Capital	James Shaw	Unknown	ML #3225
Merrill Lynch	XXXX3226	Alys Beach Fund	James Shaw	Unknown	ML #3226
Raymond James and Associates	XXXX2485	Curtis Creek Holdings, LLC	James Shaw	Unknown	RJ #2485
Regions Bank	XXXXXX0235	Sterling Online Processing Services, LLC	Frank Bell	3/17/2011	REG #0235
Regions Bank	XXXXXX8724	Sterling Online Processing Services, LLC	Frank Bell	5/26/2011	REG #8724
SunTrust Bank	XXXXXXXXXX0477	Alys Beach Account	James Shaw Carole Shaw	8/11/2014	ST #0477
SunTrust Bank	XXXXXXXXXX2159	Tyson Rhame	Tyson Rhame	05/26/2011	ST #2159
SunTrust Bank	XXXXXXXXXX7073	Carole Shaw	Carole Shaw	5/1/2013	ST #7073
SunTrust Bank	XXXXXXXXXX7372	James Shaw	James Shaw	3/27/2012	ST #7372
SunTrust Bank	XXXXXXXXXX7380	James or Carole Shaw	James Shaw Carole Shaw	3/28/2012	ST #7380
TD Ameritrade	XXX-XX3551	Lullwater Holdings, LLC	Tyson Rhame	11/1/2011	TDA #3551
TD Ameritrade	XXX-XX5715	Lullwater Holdings, LLC	Tyson Rhame	9/1/2012	TDA #5715
TD Ameritrade	XXX-XX5720	The TAR Revocable Trust	Tyson Rhame	09/01/2012	TDA #5720
TD Ameritrade	XXX-XX7569	Lullwater Holdings, LLC	Tyson Rhame	10/1/2011	TDA #7569
USAA Federal Savings Bank	XXX-X184-2	Tyson Rhame	Tyson Rhame	09/15/2011	USAA #1842
USAA Federal Savings Bank	XXX-X327-2	Tyson Rhame	Tyson Rhame	4/2/1997	USAA #3272
Wedbush Morgan Securities Inc.	XXXX4008	Broadway Trader 4Z, LLC	James Shaw	03/18/2015	WED #4008

Bank Name	Account #³	Held in the Name of	Authorized Signatories	Date Opened	Referenced hereinafter as
Wedbush Morgan Securities Inc.	XXXX8860	Springlake Trading, LLC	James Shaw	08/05/2014	WED #8860
Wells Fargo	XXXXXX0124	Scotch Cove, LLC	Tyson Rhame	3/14/2014	WF #0124
Wells Fargo	XXXXXX0132	RG Classics, LLC	Tyson Rhame Redacted	3/19/2014	WF #0132
Wells Fargo	XXXXXX0165	Isolveit.com, LLC	Tyson Rhame Frank Bell	5/8/2014	WF #0165
Wells Fargo	XXXXXX0199	Sterlingfunder, LLC	Tyson Rhame James Shaw Redacted	2/11/2014	WF #0199
Wells Fargo	XXXXXX0223	Sherrills Ford Holdings, LLC	Tyson Rhame	3/8/2014	WF #0223
Wells Fargo	XXXXXX0231	Alex Capital Holdings, LLC	Tyson Rhame James Shaw	9/12/2012	WF #0231
Wells Fargo	XXXXXX0280	Trinvest Partners, LLC	Tyson Rhame	12/11/2012	WF #0280
Wells Fargo	XXXXXX0298	Sky Combat Blue, LLC	Tyson Rhame	1/3/2013	WF #0298
Wells Fargo	XXXXXX0371	TR East Point Real Estate, LLC	Tyson Rhame	8/28/2013	WF #0371
Wells Fargo	XXXXXX0397	TR Interactive Technologies, LLC	Tyson Rhame	10/21/2013	WF #0397
Wells Fargo	XXXXXX0496	Polaris Aviation, LLC	Tyson Rhame	10/25/2012	WF #0496
Wells Fargo	XXXXXX0579	Sky Combat Red, LLC	Tyson Rhame	12/12/2012	WF #0579
Wells Fargo	XXXXXX2673	Cascades at Rea, LLC	Tyson Rhame	7/10/2014	WF #2673
Wells Fargo	XXXXXX2681	Arrowhead Station Holdings, LLC	Tyson Rhame	9/11/2014	WF #2681
Wells Fargo	XXXXXX2821	Sterling Online Processing Services	Frank Bell	11/15/2011	WF #2821

Bank Name	Account #³	Held in the Name of	Authorized Signatories	Date Opened	Referenced hereinafter as
Wells Fargo	XXXXXX2839	Sterling Online Processing Services	Frank Bell	11/15/2011	WF #2839
Wells Fargo	XXXXXX2850	Tyson Rhame	Tyson Rhame	3/14/2012	WF #2850
Wells Fargo	XXXXXXXX3245	Miracle Charters, LLC	Tyson Rhame Redacted	Unknown	WF #3245
Wells Fargo	XXXXXX3808	GID Partners, LLC	Frank Bell	10/8/2013	WF #3808
Wells Fargo	XXXXXX4675	Tyson Rhame	Tyson Rhame	03/15/2012	WF #4675
Wells Fargo	XXXXXX4767	Primestone Properties, LLC	James Shaw Redacted	4/30/2014	WF #4767
Wells Fargo	XXXXXX4832	Trinvest Partners, LLC	Tyson Rhame	12/11/2012	WF #4832
Wells Fargo	XXXXXX5133	TR Real Estate, LLC	Tyson Rhame	2/29/2012	WF #5133
Wells Fargo	XXXXXX5439	Lullwater Holdings, LLC	Tyson Rhame	10/25/2011	WF #5439
Wells Fargo	XXXXXX5536	Sterling Online Processing Services	Frank Bell	3/26/2014	WF #5536
Wells Fargo	XXXXXX5551	Whistlejacket, Inc.	Frank Bell	3/26/2014	WF #5551
Wells Fargo	XXXXXX6320	J-Brem, LLC	Frank Bell	8/14/2012	WF #6320
Wells Fargo Advisors	XXXX-6797	Tyson Rhame	Tyson Rhame	06/28/2012	WF #6797
Wells Fargo	XXXXXX7400	Therrell Farms Estates, LLC	Tyson Rhame	9/23/2014	WF #7400
Wells Fargo Advisors	XXXX-7939	Lullwater Holdings, LLC	Tyson Rhame	6/28/2012	WF #7939
Wells Fargo	XXXXXX8032	Lullwater Holdings, LLC	Tyson Rhame	10/25/2011	WF #8032
Wells Fargo	XXXXXX8575	GID Partners, LLC	Frank Bell	10/8/2013	WF #8575
Wells Fargo	XXXXXX8594	Frank Bell	Frank Bell	3/26/2014	WF #8594
Wells Fargo	XXXXXX8658	Trinvest, LLC	Tyson Rhame	10/27/2014	WF #8658

Bank Name	Account # ³	Held in the Name of	Authorized Signatories	Date Opened	Referenced hereinafter as
Wells Fargo	XXXXXX8674	Zonolite Holdings, LLC	Tyson Rhame	10/23/2014	WF #8674
Wells Fargo	XXXXXX9969	Sustainability Solutions, LLC	Tyson Rhame	5/21/2014	WF #9969

A. The Business Entities, Their Relationships, and Their Ownership

47. The following chart describes the ownership interests between Alex, Sterling, Sterling Online, GID, Curtis Creek, Lullwater, Lullwater Trust, and Valley Trust:

Company	Partners	Percentage	Incorporation State
Alex Capital Holdings, LLC	Curtis Creek Holdings, LLC	50%	Delaware
	Lullwater Holdings, LLC	50%	
Sterling Currency Group, LLC	Alex Capital Holdings, LLC	100%	Georgia
Sterling Online Processing Services, LLC	Curtis Creek Holdings, LLC	50%	Georgia
	Lullwater Holdings, LLC	50%	
GID Partners, LLC	Alex Capital Holdings, LLC	100%	Georgia
Curtis Creek Holdings, LLC	JS, LS, Valley Trust		South Dakota
Lullwater Holdings, LLC	TR, Lullwater Trust		South Dakota

48. Rhame controls Lullwater directly and through Lullwater Trust. In addition, Rhame has or had an interest in or some degree of control over Miracle Charters, Therrell Farms Estates, Zonolite Holdings, Sustainability Solutions, Cascades at Rea, Arrowhead Station Holdings, TR Real Estate, Scotch Cove, LLC, RG Classics,

Isolveit.com, Sherrills Ford Holdings, Trinvest Partners, Sky Combat Blue, Sky Combat Red, Polaris Aviation, TR East Point Real Estate, TR Interactive Technologies, Sterling Funder, SR Equipment Leasing, and TAR Revocable Trust.

49. Similarly, J.Shaw and C.Shaw own Curtis Creek directly and through Valley Trust. In addition, J.Shaw has or had an interest in or some degree of control over JS Real Estate Investments, Primestone Properties, SR Equipment Leasing LLC, Wingover Capital LLC, Northwest Capital LLC, Broadway Trader 4Z, Springlake Trading, Sterling Funder, and Alys Beach Fund.

50. Bell manages the daily affairs of the Sterling entities as the Chief Operating Officer and through his company, Whistlejacket. In addition, Bell has at one point had an interest in or some degree of control over "J-Brem."

B. Tracing the Tainted Funds

51. Sterling has used at least nine known bank accounts to receive currency purchase money from investors.

52. As detailed in Exhibits A, B, C, D, and E to this Complaint, proceeds from sales of currency to consumers were received in the nine accounts listed below, and gross deposits into each account during the range specified appear below:

Date Range	Account	
02/01/2011 to 05/11/2011	FTB #9640	\$ 26,005,096.82
07/26/2011 to 11/18/2011	GCB #5361	\$ 13,704,389.63
07/19/2011 to 11/18/2011	GCB #5379	\$ 51,876,456.67
11/16/2011 to 11/01/2013	WF #2821	\$ 20,436,714.53
11/11/2013 to 10/31/2014	ACT #2-74	\$ 3,162,078.82
11/05/2013 to 10/31/2014	ACT #1-74	\$ 69,831,589.87
01/02/2014 to 11/28/2014	CHEL #5493	\$ 4,098,617.38
02/26/2014 to 11/28/2014	CHEL #9734	\$ 28,915,707.06
01/02/2014 to 02/28/2014	CHEL #0592	\$ 4,757,490.52
	TOTAL	\$222,788,141.30

53. Thereafter, as shown in exhibits A-K, tainted funds flowed from and through the above-listed accounts, a significant number of which were held in names other than Sterling, and into the Dresden Property, the Paces Place Property, the Brookhaven Property, the Shinbone Property, the La Garza Property, the Cessna, the Gipps Aero, the Black Mercedes, the Silver Mercedes, and the Black Audi, as well as into Alex Capital; Sterling Online, GID, Curtis Creek, Lullwater, Valley Trust, Lullwater Trust, Springlake Trading, JS Real Estate Investments, SR Equipment Leasing, Primestone Properties, Wingover Capital, Northwest Capital, THE TAR Revocable Trust, Broadway Trader 4Z, Yards at Noda, Sherills Ford Holdings, Scotch Cove, RG Classics, Isolveit.com, Sterlingfunder, Trininvest, Sky Combat Blue, TR East Point Real Estate, TR Interactive Technologies, Polaris Aviation, Sky Combat Red, Cascades at Rea, Arrowwood Station Holdings, Arrowhead Station Holdings, Miracle Charters, TR Real Estate, Whistlejacket, J-

Brem, Therrell Farms Estates, Zonolite Holdings, Sustainability Solutions, Gvest Holdings, Gvest Partners, Gvest Capital, 200 West Land DST, Primestone Feifco Realty Fund, Preferred Capital, Reclaim Group, Wingover Ranch, Shaw Capital & Guaranty, Shaw Irrevocable Trust, Shaw Alys Beach, Trinvest Partners, GID Associates and/or assets owned by those business entities.

54. The purposes behind some of those financial transactions included remitting proceeds to conspirators, facilitating the operation of the underlying scheme, and concealing and disguising the nature, source, location, ownership, and control of fraud proceeds.

55. Additionally, by moving the tainted funds out of receiving accounts and into “downstream” accounts, conspirators engaged in unlawful monetary transactions involving more than \$10,000 in tainted funds.

56. Finally, acts promoting the schemes to defraud and launder money were committed at the Valley Road, Heather Drive, and Brookhaven Properties.

57. Consequently, the United States is entitled to forfeiture of the Defendant Properties as proceeds traceable directly and indirectly to schemes and artifices to defraud and properties involved in money laundering offenses.

IV. Conclusion

WHEREFORE, the United States prays:

That the Court forfeit the Defendant Properties to the United States of America;

That the Court award the Plaintiff the costs of this action; and

That the Court grant such other relief as the Court deems just and proper.

Respectfully submitted this 9th day of June, 2015.

Respectfully submitted,

JOHN A. HORN

Acting United States Attorney

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/s/THOMAS J. KREPP

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/s/JENNY R. TURNER

Assistant United States Attorney

Georgia Bar No. 719439

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,

v.

THE REAL PROPERTY LOCATED AT
225 VALLEY ROAD, N.W., ATLANTA,
FULTON COUNTY, GEORGIA; 1418
DRESDEN DRIVE, N.E., NUMBER
A310, ATLANTA, DEKALB COUNTY,
GEORGIA; 3464 PACES PLACE, N.W.,
ATLANTA, FULTON COUNTY,
GEORGIA; 4536 EAST BROOKHAVEN
DRIVE, ATLANTA, FULTON AND
DEKALB COUNTIES, GEORGIA;
2385 HEATHER DRIVE, DECATUR,
DEKALB COUNTY, GEORGIA; 48
SHINBONE COURT, PANAMA CITY
BEACH, WALTON COUNTY,
FLORIDA, 7 LA GARZA COURT,
PANAMA CITY BEACH, WALTON
COUNTY, FLORIDA; THE 2006
CESSNA CITATION XLS,
MANUFACTURER'S SERIAL NUMBER
560-5623, BEARING REGISTRATION
NUMBER N562VP; THE GIPPS AERO
PARTY LIMITED MODEL GA8TC-320
BEARING TAIL NUMBER N68GA
AND SERIAL NUMBER GA8-TC-320-
12-187; THE EXTRA
FLUGZEUGPRODUKTIONS UND
MODEL EA300/LT BEARING TAIL
NUMBER N330TY AND SERIAL

Civil Action No.

1:15-CV-2032-LMM

NUMBER LT020; THE BLACK 2012 MERCEDES BENZ GL550 BEARING VEHICLE IDENTIFICATION NUMBER 4JGBF8GE5CA785200 AND GEORGIA TAG NUMBER PAK5506; THE SILVER 2012 SILVER MERCEDES BENZ SLS AMG BEARING VEHICLE IDENTIFICATION NUMBER WDDRJ7HA1CA008056 AND GEORGIA TAG NUMBER BXY3941; THE BLACK 2013 AUDI SS QUATRO BEARING VEHICLE IDENTIFICATION NUMBER WAUD2AFD2DN020235 AND GEORGIA TAG NUMBER PMC8546; AND ALL RIGHT, TITLE AND INTEREST OF STERLING CURRENCY GROUP, LLC, STERLING ONLINE PROCESSING SERVICES, LLC, GID PARTNERS, LLC, ALEX CAPITAL HOLDINGS LLC, LULLWATER HOLDINGS LLC, CURTIS CREEK HOLDINGS, LLC, VALLEY TRUST, LULLWATER TRUST, TYSON RHAME, JAMES SHAW, CAROLE LAURETTE SHAW, AND/OR FRANK BELL IN ALEX CAPITAL HOLDINGS LLC; STERLING CURRENCY GROUP LLC, STERLING ONLINE PROCESSING SERVICES LLC, GID PARTNERS LLC, CURTIS CREEK HOLDINGS LLC, LULLWATER HOLDINGS LLC, VALLEY TRUST, LULLWATER TRUST, SPRINGLAKE TRADING, LLC, JS REAL ESTATE INVESTMENTS, LLC, SR EQUIPMENT LEASING, LLC, PRIMESTONE PROPERTIES LLC, WINGOVER

CAPITAL LLC, NORTHWEST
CAPITAL LLC, THE TAR REVOCABLE
TRUST, BROADWAY TRADER 4Z,
LLC, YARDS AT NODA, LLC,
SHERRILLS FORD HOLDINGS LLC,
SCOTCH COVE, LLC, RG CLASSICS
LLC, ISOLVEIT.COM LLC,
STERLINGFUNDER LLC, TRINVEST
LLC, SKY COMBAT BLUE LLC, TR
EAST POINT REAL ESTATE LLC, TR
INTERACTIVE TECHNOLOGIES LLC,
POLARIS AVIATION LLC, SKY
COMBAT RED LLC, CASCADES AT
REA, LLC, ARROWOOD STATION
HOLDINGS LLC , ARROWHEAD
STATION HOLDINGS LLC, MIRACLE
CHARTERS, LLC, TR REAL ESTATE
LLC, WHISTLEJACKET, INC., J-BREM
LLC, THERRELL FARMS ESTATES
LLC, ZONOLITE HOLDINGS LLC,
SUSTAINABILITY SOLUTIONS LLC,
GVEST HOLDINGS LLC, GVEST
PARTNERS LLC, GVEST CAPITAL
LLC, 200WEST LAND DST,
PRIMESTONE FIFECO REALTY FUND
LLC, PREFERRED CAPITAL LLC,
RECLAIM GROUP LLC, WINGOVER
RANCH, LLC, SHAW CAPITAL &
GUARANTY, LLC, SHAW
IRREVOCABLE TRUST, SHAW ALYS
BEACH LLC, TRINVEST PARTNERS,
LLC, AND GID ASSOCIATES LLC.

VERIFICATION

I, W. Scott Baucom, of the Federal Bureau of Investigation, have read the Amended Verified Complaint for Forfeiture in this action and state that its

contents are true and correct to the best of my knowledge and belief based upon my personal knowledge of the case and upon information obtained from other law enforcement personnel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

This 8th day of June, 2015.

/s/ 

W. Scott Baucom
Special Agent
Federal Bureau of Investigation

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,

v.

THE REAL PROPERTY LOCATED AT
225 VALLEY ROAD, N.W., ATLANTA,
FULTON COUNTY, GEORGIA; 1418
DRESDEN DRIVE, N.E., NUMBER
A310, ATLANTA, DEKALB COUNTY,
GEORGIA; 3464 PACES PLACE, N.W.,
ATLANTA, FULTON COUNTY,
GEORGIA; 4536 EAST BROOKHAVEN
DRIVE, ATLANTA, FULTON AND
DEKALB COUNTIES, GEORGIA; 2385
HEATHER DRIVE, DECATUR,
DEKALB COUNTY, GEORGIA; 48
SHINBONE COURT, PANAMA CITY
BEACH, WALTON COUNTY,
FLORIDA, 7 LA GARZA COURT,
PANAMA CITY BEACH, WALTON
COUNTY, FLORIDA; THE 2006
CESSNA CITATION XLS,
MANUFACTURER'S SERIAL NUMBER
560-5623, BEARING REGISTRATION
NUMBER N562VP; THE GIPPS AERO
PARTY LIMITED MODEL GA8TC-320
BEARING TAIL NUMBER N68GA
AND SERIAL NUMBER GA8-TC-320-
12-187; THE EXTRA
FLUGZEUGPRODUKTIONS UND
MODEL EA300/LT BEARING TAIL
NUMBER N330TY AND SERIAL
NUMBER LT020; THE BLACK 2012

Civil Action No.

1:15-CV-2032-LMM

MERCEDES BENZ GL550 BEARING
VEHICLE IDENTIFICATION NUMBER
4JGBF8GE5CA785200 AND GEORGIA
TAG NUMBER PAK5506; THE SILVER
2012 SILVER MERCEDES BENZ SLS
AMG BEARING VEHICLE
IDENTIFICATION NUMBER
WDDRJ7HA1CA008056 AND
GEORGIA TAG NUMBER BXY3941;
THE BLACK 2013 AUDI SS QUATRO
BEARING VEHICLE IDENTIFICATION
NUMBER WAUD2AFD2DN020235
AND GEORGIA TAG NUMBER
PMC8546; AND ALL RIGHT, TITLE
AND INTEREST OF STERLING
CURRENCY GROUP, LLC, STERLING
ONLINE PROCESSING SERVICES,
LLC, GID PARTNERS, LLC, ALEX
CAPITAL HOLDINGS LLC,
LULLWATER HOLDINGS LLC,
CURTIS CREEK HOLDINGS, LLC,
VALLEY TRUST, LULLWATER TRUST,
TYSON RHAME, JAMES SHAW,
CAROLE LAURETTE SHAW,
AND/OR FRANK BELL IN ALEX
CAPITAL HOLDINGS LLC; STERLING
CURRENCY GROUP LLC, STERLING
ONLINE PROCESSING SERVICES
LLC, GID PARTNERS LLC, CURTIS
CREEK HOLDINGS LLC, LULLWATER
HOLDINGS LLC, VALLEY TRUST,
LULLWATER TRUST, SPRINGLAKE
TRADING, LLC, JS REAL ESTATE
INVESTMENTS, LLC, SR EQUIPMENT
LEASING, LLC, PRIMESTONE
PROPERTIES LLC, WINGOVER
CAPITAL LLC, NORTHWEST

CAPITAL LLC, THE TAR REVOCABLE TRUST, BROADWAY TRADER 4Z, LLC, YARDS AT NODA, LLC, SHERRILLS FORD HOLDINGS LLC, SCOTCH COVE, LLC, RG CLASSICS LLC, ISOLVEIT.COM LLC, STERLINGFUNDER LLC, TRINVEST LLC, SKY COMBAT BLUE LLC, TR EAST POINT REAL ESTATE LLC, TR INTERACTIVE TECHNOLOGIES LLC, POLARIS AVIATION LLC, SKY COMBAT RED LLC, CASCADES AT REA, LLC, ARROWOOD STATION HOLDINGS LLC, ARROWHEAD STATION HOLDINGS LLC, MIRACLE CHARTERS, LLC, TR REAL ESTATE LLC, WHISTLEJACKET, INC., J-BREM LLC, THERRELL FARMS ESTATES LLC, ZONOLITE HOLDINGS LLC, SUSTAINABILITY SOLUTIONS LLC, GVEST HOLDINGS LLC, GVEST PARTNERS LLC, GVEST CAPITAL LLC, 200WEST LAND DST, PRIMESTONE FIFECO REALTY FUND LLC, PREFERRED CAPITAL LLC, RECLAIM GROUP LLC, WINGOVER RANCH, LLC, SHAW CAPITAL & GUARANTY, LLC, SHAW IRREVOCABLE TRUST, SHAW ALYS BEACH LLC, TRINVEST PARTNERS, LLC, AND GID ASSOCIATES LLC.

I hereby certify, pursuant to Local Rules 5.1 and 7.1D, that the foregoing Amended Verified Complaint for Forfeiture has been prepared using Book

Antiqua, 13 point font.

/s/ Thomas J. Krepp
Assistant U.S. Attorney