

FEDERAL BUREAU OF INVESTIGATION

Date of entry 07/11/2013

[redacted] date of birth (DOB) [redacted] social security account number (SSAN [redacted]) was interviewed at the KGW CAPITAL office located at 2400 North Dallas Parkway, Suite 540, Plano, TX, 75093.

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[redacted] Commodities and Futures Trading Commission (CFTC), [redacted] Securities and Exchange Commission (SEC), [redacted] (SEC), [redacted] (SEC), and [redacted] (SEC), were present during portions of the interview. After being advised of the identity of the interviewing Agent and the voluntary nature of the interview, [redacted] provided the following information:

[redacted] indicated the [redacted] had two years of audited performance results, for approximately 2009 through 2011. Between [redacted]

At the time [redacted]

[redacted] did not know whether [redacted]

However [redacted]

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According to [redacted]

[redacted] at the time, [redacted]

[redacted] in approximately 2011. For the audit report [redacted]

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[redacted] Although the documents show [redacted] was not created until 2011, [redacted] believed it really began in 2009, even though it was not called [redacted] at the time, [redacted]

[redacted] brought in an outside developer to expand on the tracking of currency pairs. The name of the developer was SHAUN OVERTON (OVERTON). OVERTON was a programmer who had

Investigation on 07/10/2013 at Plano, Texas, United States (In Person)

File [redacted] Date drafted 07/11/2013

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[Redacted]
Continuation of FD-302 of Interview of [Redacted], On 07/10/2013, Page 2 of 2

incorporated, however [Redacted] could not remember the name of OVERTON's company.

[Redacted]
[Redacted]

[Redacted] indicated that RFF is not currently using any software to conduct trading.

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[Redacted]

[Redacted]

[Redacted]

[Redacted]

Filing and Security

UNCLASSIFIED

Primary Case:

[Redacted]

Case Title: (U)

[Redacted]

REVELATION FOREX FUND;
KGW CAPITAL;
COMMODITIES FRAUD

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Serial Number: 35

Serialized: 08/30/2013

Category:
Initiated:

[Redacted]

Referenced By:

[Redacted]

Accomplishment

Details

Document Title: (U) Scanned Documents Provided By Court Appointed Receiver
Drafted Date: 08/26/2013
Type of Activity: Other
Methods: Mail
Investigation On: 08/26/2013
At: Dallas, Texas, United States
Details: (U)

On August 22, 2013, writer received a CD containing documents received from SCHEEF & STONE, L.L.P., a receiver appointed by the U.S. District Court for the Eastern District of Texas in a civil enforcement matter instituted by the U.S. SECURITIES & EXCHANGE COMMISSION against KGW CAPITAL and [Redacted]. The CD contains documents seized by the receiver from both [Redacted] at KGW CAPITAL. The documents on the CD are numbered KGW 000001 - KGW 006694.

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Upon initial review, the following documents are noted as being of investigative interest:

000068-000069

[Redacted]

000070-000072

Table "KGW Capital Funding for Meridian Propane" updated June 10, 2013

[Redacted] (from [Redacted])

000144

[Redacted]

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000283

"Conference & Seminar Schedule" updated July 1, 2013 (from [Redacted])

000306-000326

List of Money Show e-booth visitors (from [Redacted])

000334

Itinerary for [Redacted] for flight to Las Vegas to attend the Money Show (from [Redacted])

000337

Budget for [Redacted] expenses at the

[Redacted]

004131-004151 [Redacted] between [Redacted] indicating a [Redacted]

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[Redacted]

004155-004163 [Redacted] occasions (from [Redacted])

004174-004181 [Redacted]

004254 Wall Street Journal press release announcing RFF ranked as #2 best performing fund, dated June 6, 2013 (from [Redacted])

004284-004285 [Redacted] and the Money Show Las Vegas (from [Redacted])

004287 Check register showing [Redacted]

004288 Check register showing [Redacted]

004412-004415 Letter to potential MP investor from [Redacted] indicating MP management team has succeeded in the past with the same business model (from [Redacted])

004545-004546 MP business plan (from [Redacted])

004644-004647 Documentation on MP EB-5 visa program for international investors discussing [Redacted] ENCORE PROPANE (from [Redacted])

004656 "The Genius Behind a Currency Fund" flyer touting RFF's #2 ranking and compound annual growth rate from 2009 to 2013 of 37.60% (from [Redacted])

004667 Notes from [Redacted] July 2, 2013, Yorba Media radio interview on RFF (from [Redacted])

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004687-004690 "eNewsletter Ad Tracking Sheet" showing paid RFF advertisements (from [Redacted])

004733-004736 RFF press release results (from [Redacted])

004910 Spreadsheet showing MP projected losses until 2015 (from [Redacted])

005048 MP August 2013 operating losses (from [Redacted])

005133 [Redacted]

[Redacted]

006024 E-mail from SHAUN OVERTON (OVERTON) at www.onestepremoved.com explaining to [Redacted] that OVERTON was not able to create the software [Redacted] desired because the data was so wide it was not useful for trading (from [Redacted])

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006037 E-mail from [Redacted] to OVERTON dated December 9, 2011, in which [Redacted] states up to that point [Redacted] had been trading "a very small account in just a few paired

pairs." (from

[Redacted]

006038

Text from e-mail from OVERTON stating no formula can be made for trading software based on the data [Redacted] provided OVERTON on [Redacted] trading history, which appeared to OVERTON to be completely random (from [Redacted])

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006614-006615

Frequently Asked Questions about RFF, containing material misrepresentations about RFF performance and software

(from

[Redacted]

The CD and a spreadsheet indicating the locations where the documents were found are contained in a physical 1A.

1A/1C Packages

Package 1A22

Summary: (U) CD containing documents seized from KGW office, bates numbers KGW 000001-KGW006694, spreadsheet listing locations where the documents were found.

Acquired By:

[Redacted]

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Acquired On: 08/30/2013

Receipt Given: No

Attachments: UNCLASSIFIED



(U) CD containing documents seized from KGW office, bates numbers KGW 000001-KGW006694, spreadsheet listing locations where the documents were found.

Indexing

Physical Record

Display Name	Enterprise Role	Entity Role	Entity Type	US Person
[Redacted]	CASE INDEX	Reference	PERSON	Unknown
[Redacted]	CASE INDEX	Reference	PERSON	Unknown
MERIDIAN PROPANE	CASE INDEX	Reference	ORGANIZATION	Yes
SHAUN OVERTON	CASE INDEX	Reference	PERSON	Unknown
[Redacted]	CASE INDEX	Reference	PERSON	Unknown
[Redacted]	CASE INDEX	Reference	PERSON	Unknown
[Redacted]	CASE INDEX	Reference	PERSON	Unknown
[Redacted]	CASE INDEX	Reference	PERSON	Yes
[Redacted]	CASE INDEX	Reference	PERSON	Unknown
[Redacted]	CASE INDEX	Reference	PERSON	Unknown

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Accomplishments

Accomplishment: Interview or requested information from the public or private entities

Claimant:

[Redacted]

Date: 08/22/2013

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Filing and Security

UNCLASSIFIED//~~FOUO~~

Primary Case: [Redacted]

Case Title: (U) [Redacted]

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REVELATION FOREX FUND;
KGW CAPITAL;
COMMODITIES FRAUD

Serial Number: 37

Serialized: 09/09/2013

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Category: [Redacted]
Initiated: [Redacted]

Referenced By: [Redacted]

Accomplishment

Details

Document Title: (U) Telephonic Interview of SHAUN OVERTON
Drafted Date: 09/09/2013
Type of Activity: Interview
Methods: Phone
Investigation On: 09/09/2013
At: Dallas, Texas, United States
Details: (U//~~FOUO~~)

SHAUN OVERTON, owner of OneStepRemoved.com, telephone number 817-210-4019, was interviewed telephonically. After being advised of the identity of the interviewing Agent and the nature of the interview, OVERTON provided the following information:

OVERTON was located in Ireland where he had traveled for business purposes. OVERTON had been involved in litigation with [Redacted] regarding [Redacted] failure to pay a bill for software development OVERTON and his company had done at [Redacted] request. OVERTON was made aware of [Redacted] current legal troubles by his friend [Redacted]. OVERTON used to work at FXCM with [Redacted]. When OVERTON realized [Redacted]

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OVERTON advised his attorney they should not pursue their legal matter against [Redacted] because they would never collect any money.

OVERTON made a couple of different products for [Redacted]. The first product was a simple indicator. OVERTON was unsure whether [Redacted] ever used that product. The second product was a tool that was supposed to be a big enhancement to the indicator. This tool would show all the data on one screen. It sorted and categorized trading opportunities based on the separation in movement between paired pairs, ranking them for review. The trader, in this case [Redacted] would have to review the ranked opportunities to decide if he believed he should take action on them. This product was based on trading strategy, not any particular trading history. This is a proprietary product, but [Redacted] never paid for it so he technically has no ownership interest in it.

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The third product was a product [Redacted] really wanted, and that was a product that would have been based solely on [Redacted] trading history, using a formula that would have allowed the user of the software to replicate the types of trades [Redacted] had been making. OVERTON was unable to deliver this product because the data was too random and it would have never worked.

When asked about e-mail correspondence between [Redacted] which

apparently indicated [redacted] did not want to be at [redacted] on an occasion when [redacted] was going to be meeting OVERTON, OVERTON stated he imagined [redacted] did not want to be there because OVERTON used to work at FXCM and [redacted] may have thought word would get back to FXCM that [redacted] was [redacted] may have been in [redacted] and could have been cause for [redacted]

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OVERTON indicated that he was not aware of a specific policy in writing, but that it was general knowledge that an employee needed to check with FXCM management for approval. OVERTON noted that he once sought approval to do some trading for one of FXCM's vendors and his request was denied. OVERTON noted that there was not anyone in particular designated to handle such requests, OVERTON would just approach the person in management he believed would be most inclined to approve it who was senior to him. In the case of [redacted] because [redacted] [redacted] would have to approve.

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1A/IC Packages

Package 1A24


Summary: (U) Original notes re interview of SHAUN OVERTON telephonically om September 9. 2013.

Acquired By: [redacted]

Acquired On: 09/09/2013

Receipt Given: No

Attachments: UNCLASSIFIED//~~FOUO~~

 (U) Original notes re interview of SHAUN OVERTON telephonically on September 9. 2013.
Physical Record

Indexing

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Display Name	Enterprise Role	Entity Role	Entity Type	US Person
SHAUN OVERTON	CASE INDEX	Reference	PERSON	Unknown
FXCM	CASE INDEX	Reference	ORGANIZATION	Unknown
[redacted]	CASE INDEX	Reference	PERSON	Unknown
[redacted]	CASE INDEX	Reference	PERSON	Unknown

Accomplishments

Accomplishment: Interview or requested information from the public or private entities

Claimant: [redacted]

Date: 09/09/2013

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Interview Type: Interview
Interviewees: Witness

Location of Investigative Method: United States (50 states and DC)
Task Force: none

Routing

Drafted by

Approved by

[Redacted signature box]

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[Redacted]

Filing and Security

UNCLASSIFIED//~~FOUO~~

Primary Case: [Redacted]

Case Title: (U) [Redacted]
REVELATION FOREX FUND;
KGW CAPITAL;
COMMODITIES FRAUD

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b7E

Serial Number: 39

Serialized: 09/17/2013

Category Initiated [Redacted]

Referenced By: [Redacted]
Accomplishment

Details

Document Title: (U) Interview of [Redacted]
Drafted Date: 09/13/2013
Type of Activity: Interview
Methods: In Person
Investigation On: 09/10/2013
At: Plano, Texas, United States
Details: (U//~~FOUO~~)

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[Redacted] date of birth (DOB [Redacted] social security account number (SSAN) [Redacted] was interviewed at the United States Attorney's Office, Eastern District of Texas. Also present for the course of the interview were [Redacted] and [Redacted] of the law firm DYKEMA, as well as Assistant United States Attorney [Redacted]. After being advised of the identity of the interviewing Agent and the nature of the interview, [Redacted] provided the following information:

[Large Redacted Block]

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Prior to attending the Money Show in Las Vegas, [redacted] to two times a week with [redacted] and [redacted] in the KGW conference room. In the meetings, [redacted]

[redacted]

From the meetings and discussion it was clear that the purpose of

[redacted]

[redacted]

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Proprietary Software

[redacted] had asked SHAUN OVERTON to develop software so that trading could be automated based on [redacted] trading history. OVERTON was unable to develop the software completely because the data was too random.

OVERTON did create a version of the software that consisted of about one third of the product that [redacted] had hoped could be created. Therefore, [redacted] did use a partially developed software package.

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With regards to an October 11, 2011, e-mail in which [redacted] when OVERTON comes to talk with [redacted] about developing the software, [redacted] believed [redacted] indicated he wanted to avoid OVERTON because OVERTON used to work at FXCM, where [redacted]

[redacted] OVERTON happened to tell someone at FXCM that [redacted]

After [redacted] stopped trading for RFF in the fall of 2012, [redacted] never used any software to carry out his arbitrage trading strategy. [redacted] did not follow an arbitrage trading strategy when [redacted] traded on the accounts.

1A/1C Packages

Package 1A26

Summary: (U) Original notes re interview of [redacted] on September 10, 2013.

Acquired By: [redacted]

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Acquired On: 09/13/2013

Receipt Given: No

Attachments: UNCLASSIFIED//~~FOUO~~

(U) Original notes re interview of [redacted] on September 10, 2013.

Physical Record

Indexing



b7E

Display Name	Enterprise Role	Entity Role	Entity Type	US Person
[Redacted]	CASE INDEX	Reference	PERSON	Yes
[Redacted]	CASE INDEX	Reference	PERSON	Unknown
MERIDIAN PROPANE	CASE INDEX	Reference	ORGANIZATION	Yes
SHAUN OVERTON	CASE INDEX	Reference	PERSON	Unknown
[Redacted]	CASE INDEX	Reference	PERSON	Yes
REVELATION FOREX FUND	CASE INDEX	Reference	ORGANIZATION	Unknown
[Redacted]	CASE INDEX	Reference	PERSON	Unknown
[Redacted]	CASE INDEX	Reference	PERSON	Unknown
[Redacted]	CASE INDEX	Reference	PERSON	Unknown
[Redacted]	CASE INDEX	Reference	PERSON	Unknown

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Accomplishments

Accomplishment: Interview or requested information from the public or private entities

Claimant: [Redacted]

Date: 09/10/2013

Interview Type: Interview

Interviewees: Subject

Location of Investigative Method: United States (50 states and DC)

Task Force: none

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Routing

Drafted by: [Redacted]

Approved by: [Redacted]