

## Preliminary Investigation Brief: Regulatory Non-Compliance and Investment Fraud

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**Issue Category:** Regulatory Non-Compliance

**Confidentiality Level:** Legal Privilege

**Risk Assessment Score:** 31

**Financial Impact USD:** 6746496

### Summary:

This Preliminary Investigation Brief provides an initial assessment of the regulatory non-compliance and investment fraud scheme unfolding at Veridian Bank. Our ongoing investigation has identified a complex web of suspicious transactions, corporate espionage, and employee misconduct. This document summarizes key findings, highlights immediate concerns, and outlines the scope of the investigation.

### Overview:

Veridian Bank's investment division, led by Marcus Thorne, has been at the center of a massive investment fraud scheme. Our investigation has uncovered a pattern of regulatory non-compliance, including:

1. Failure to report suspicious transactions to the Federal Banking Commission (FBC).
2. Inadequate Know-Your-Customer (KYC) procedures, allowing unauthorized trades.
3. Violation of the Volcker Rule, permitting proprietary trading.

These non-compliances have resulted in a significant financial impact, with estimated losses exceeding \$67 million. The scheme's scope and complexity are still being assessed, but our initial findings suggest a massive conspiracy involving multiple employees and external parties.

### Detailed Information:

Our investigation has focused on the following areas:

1. **Suspicious Transactions:** We have identified a series of suspicious transactions, including unauthorized trades and transfers of funds to external accounts. These transactions have been linked to a number of employees, including former trader Michael Voss and analyst Rebecca Torres.

2. **Corporate Espionage:** Our investigation has uncovered evidence of corporate espionage, including leaked documents and compromised systems. This suggests that external parties may have been involved in the scheme, potentially to gain an advantage in the market.
3. **Employee Misconduct:** We have identified a number of employees who may have been involved in the scheme, including former traders and analysts. These employees have been linked to suspicious transactions and have provided inconsistent or misleading information during interviews.
4. **Regulatory Non-Compliance:** Our investigation has identified a pattern of regulatory non-compliance, including failure to report suspicious transactions and inadequate KYC procedures. This has resulted in a significant financial impact and has compromised the bank's reputation.

### **Initial Concerns:**

Our investigation has raised a number of initial concerns, including:

1. **Scope and Complexity:** The scope and complexity of the scheme are still being assessed, but our initial findings suggest a massive conspiracy involving multiple employees and external parties.
2. **Financial Impact:** The estimated financial impact of the scheme exceeds \$67 million, with potential losses continuing to grow.
3. **Regulatory Action:** The FBC and other regulatory bodies are likely to take action against the bank, potentially resulting in significant fines and penalties.

### **Immediate Next Steps:**

Our investigation will continue to focus on the following areas:

1. **Interviews:** We will conduct further interviews with employees and external parties to gather more information about the scheme.
2. **Document Review:** We will review additional documents, including emails, memos, and transaction records, to gather more evidence.
3. **Regulatory Coordination:** We will coordinate with regulatory bodies, including the FBC, to ensure that our investigation is aligned with their efforts.

This Preliminary Investigation Brief provides an initial assessment of the regulatory non-compliance and investment fraud scheme unfolding at Veridian Bank. Our ongoing investigation will continue to gather evidence and assess the scope and complexity of the scheme.