

## Preliminary Investigation Brief

**Author:** Evelyn Reed, Head of Risk Management

**Department:** Finance

**Issue Category:** Financial Misconduct

**Confidentiality Level:** Internal Only

**Risk Assessment Score:** 54

**Financial Impact USD:** \$799,376,299

### Summary:

This preliminary investigation brief provides an initial assessment of the ongoing investigation into financial misconduct at Veridian Bank. The primary focus is on the investment fraud scheme, specifically the Meridian Opportunities Fund, managed by Marcus Thorne's Investment division. Our early findings suggest a complex web of deceit, involving fabricated real estate holdings, inflated valuations of the Cascade Technology Portfolio, and fictitious returns on Shadow Creek vehicles. This brief outlines the scope of the investigation, initial evidence, and immediate concerns.

### Overview:

The Meridian Opportunities Fund, with \$847 million in assets, has been at the center of our investigation. Preliminary analysis reveals a sophisticated scheme involving:

1. **Fabricated Real Estate Holdings:** 35 properties with a total value of \$450 million were created using fake property deeds, forged appraisals, and manipulated financial statements.
2. **Inflated Valuations:** Cascade Technology Portfolio, valued at \$200 million, has been overstated by 300%. This inflated valuation has been used to justify the purchase of additional assets and to conceal losses.
3. **Fictitious Returns:** Shadow Creek vehicles have generated returns of up to 20% per annum, despite being unregistered and unregulated. These returns have been used to attract new investors and to maintain the illusion of a successful investment strategy.

### Initial Evidence:

Our investigation has uncovered a number of key documents and communications that demonstrate the scope of the scheme:

1. **Email Chain:** A series of emails between Thorne and Sterling discuss the creation of the fabricated real estate holdings and the use of inflated valuations to justify new investments.
2. **Financial Statements:** Review of financial statements for the Meridian Opportunities Fund reveals a pattern of suspicious transactions, including unexplained cash withdrawals and transfers to offshore accounts.

3. **Auditor's Report:** The auditor's report for the Meridian Opportunities Fund contains a number of red flags, including a lack of supporting documentation for certain investments and a failure to comply with regulatory requirements.

### **Immediate Concerns:**

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

1. **Reputational Damage:** The scope of the scheme is likely to cause significant reputational damage to Veridian Bank and may result in the loss of client trust and confidence.
2. **Regulatory Scrutiny:** The scheme is likely to attract regulatory scrutiny, including potential fines and penalties for non-compliance with regulatory requirements.
3. **Financial Impact:** The financial impact of the scheme is significant, with estimated losses of \$799,376,299.

### **Next Steps:**

This preliminary investigation brief provides an initial assessment of the situation and outlines the next steps for the investigation, including:

1. **Further Analysis:** Continue to analyze the evidence and identify potential witnesses and interviewees.
2. **Regulatory Notification:** Notify the relevant regulatory bodies, including the Federal Banking Commission and the Securities and Exchange Commission.
3. **Client Notification:** Notify clients of the investigation and the potential impact on their investments.

### **Conclusion:**

This preliminary investigation brief provides an initial assessment of the ongoing investigation into financial misconduct at Veridian Bank. The scope of the scheme is significant, and the financial impact is substantial. We recommend that the Bank takes immediate action to rectify the situation and to restore client trust and confidence.

### **Recommendations:**

1. **Freeze Assets:** Freeze the assets of the Meridian Opportunities Fund and prevent any further transactions.
2. **Notification of Clients:** Notify clients of the investigation and the potential impact on their investments.
3. **Regulatory Compliance:** Ensure compliance with regulatory requirements and cooperate fully with regulatory bodies.

**Action Items:**

1. **Evelyn Reed (Head of Risk Management):** Continue to lead the investigation and provide regular updates to senior management.
2. **Marcus Thorne (Investment Manager):** Cooperate fully with the investigation and provide access to relevant documents and communications.
3. **Arthur Sterling (CEO):** Ensure that the Bank takes immediate action to rectify the situation and to restore client trust and confidence.

**Timeline:**

This preliminary investigation brief will be updated regularly to reflect the progress of the investigation. The next update is expected within the next 48 hours.

**Confidentiality:**

This document is confidential and should not be shared with anyone outside of the Bank without prior approval from senior management.

**Authorization:**

This document has been authorized by Evelyn Reed, Head of Risk Management, and is subject to the Bank's confidentiality and non-disclosure policies.