

Segregated Portfolio (SP) Equity Holders (The Client) Maintains accounts/Wallets & Pays reduced transaction fees. Retains full custody & beneficial ownership of assets

Our Fund Administrator ensures accuracy in execution, account reconciliation, and reporting to the various governing bodies

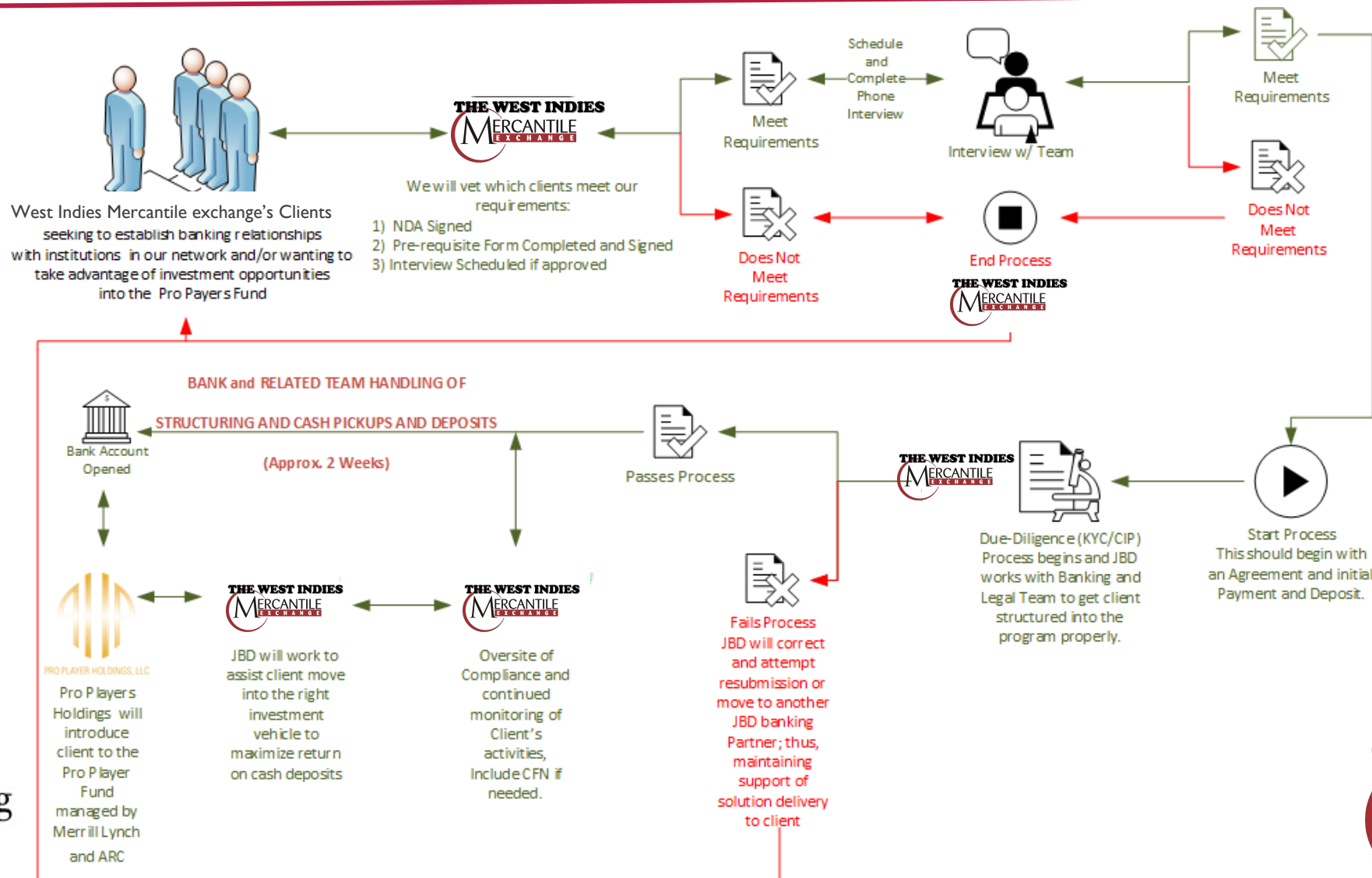
- ❖ The West Indies Trading Company – SME
- ❖ Blockchain Distributed Ledger Technology
- ❖ S³W³ Small Sat/Mod & Sim System- NASA Tech
- ❖ Caribbean Diaspora Mgmt. and Info. Sys

Licensed, Experienced Investment Management provides Industry Specific subject matter expertise per Segregated Portfolio

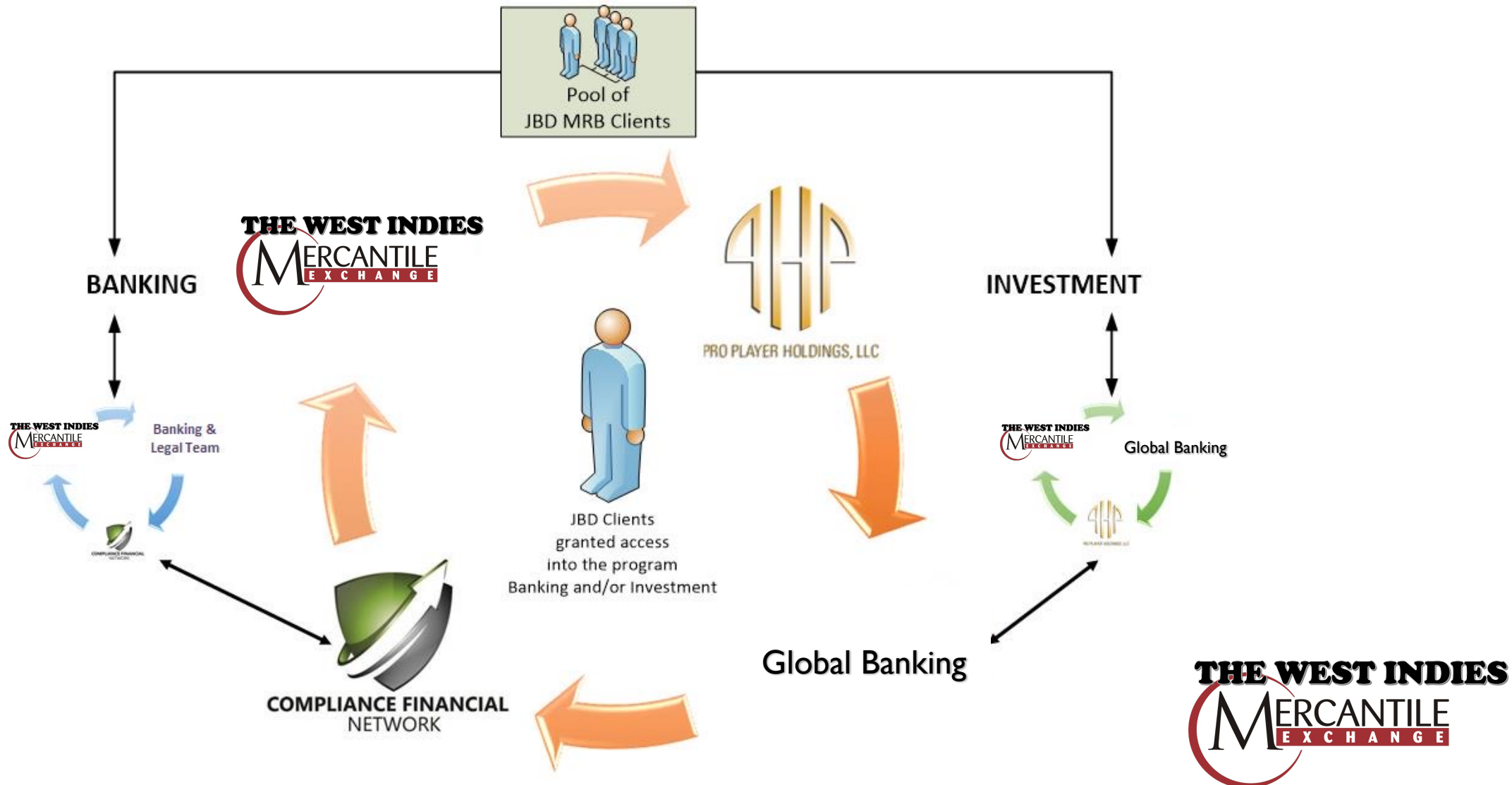
SourceEnergy Bank & Trust

Bank & Trust provides infrastructure and Technology systems

WIMEX PROCESS?



WHAT IS THE D.N.A. OF THE SOLUTION SET?



SALIENT COMPONENTS OF THE SERVICE / PROCESS

Proprietary Onboarding, Transaction Monitoring and Risk Platform

- Sophisticated Compliance Operational Platform Enhanced (SCOPE) designed for the Cannabis Industry as well as reputational risk industries.
- Client interviews, onsite audits and management of ongoing location level compliance and soundness.

Financial & Regulatory Compliance Software:

- Ongoing funds monitoring and data collection and data warehouse.
- Custom AML/BSA bank level monitoring software designed for cannabis.

Institutional Banking and Investment Solutions:

- Investment accounts for growth and added depository insurance protection.

Nationwide Cash Logistics/Management and Vaulting Services:

- Insured and bonded cash management and vaulting solutions.
- Regulatory and compliance procedures and protocols to support cash.

REGULATORY COMPLIANCE

Bank Account Open / Onsite Audit & Site inspection / Mandates - Remediation / Quarterly Re-assessment & Audit



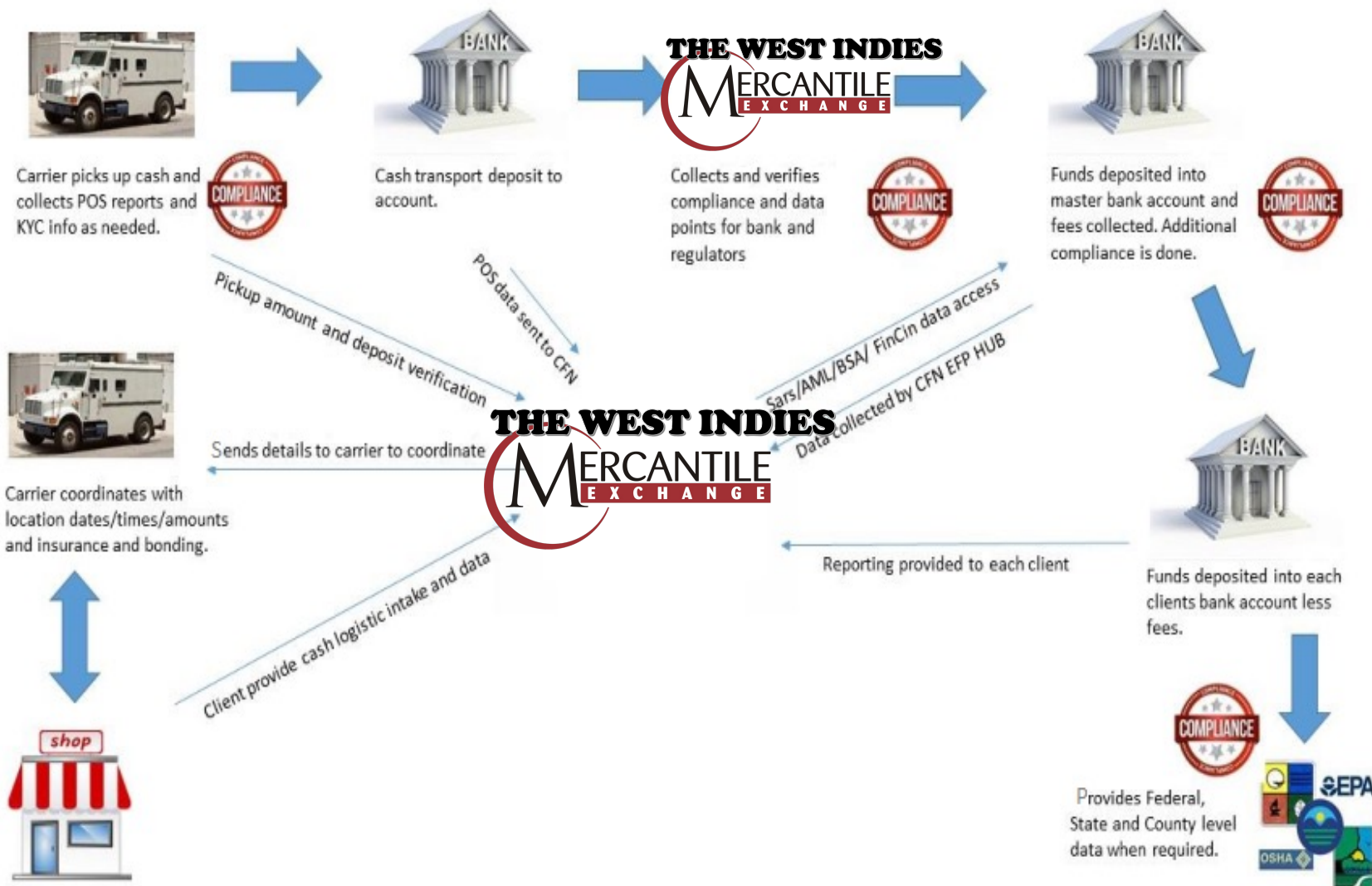
Funds Monitoring / BSA Compliance Officer Review / Compliant YES NO? / Pre-Sars, Sars and CTR Reports



Cash Pickup Scheduled / POS reports - Audit / Armored Cash Pickup - Credit Facility / Deposit at Bank or Vault



CASH LOGISTICS



REGULATORY GUIDANCE – RISK MITIGATION

Opinion Letter



Page 11, 2010

David S. Leman
VCM Consulting, LLC
4700 W. 13th Street
Suite 1100, Waco, TX 76798

To Whom It May Concern:

Re: Opinion Letter

Virtual Compliance Management Services LLC ("VCM") is a banking compliance consultancy owned by James M. Leman, VCM's CEO, who is a national compliance officer who is a Senior Senior Compliance Executive at the Federal Reserve Bank in New Orleans, and a Senior Compliance Executive at the Federal Reserve Bank of Dallas. VCM is a subsidiary of the Federal Reserve Bank of Dallas. VCM has provided the VCM Consulting, LLC and its parent VCM. As part of our services, we conduct the current regulatory environment for financial institutions that are conducting offering banking services or compliance programs. The purpose of this letter is to provide guidance to banks and other financial institutions as well as customers.

We acknowledge that offering banking services to customers has no primary concern. First, the legal status of the dispensing of cannabis is not an issue in this context. There are regulatory differences between federal, state and local regulations. We are unable to register as a bank in states that have the restriction of these differences.

In addition to questions about the legal status of dispensing, there are regulatory concerns that arise in offering banking services to customers. We discuss these concerns in further detail in the appendix to this letter. In summary, the largest concern is the ability of the financial institution to receive regulatory approval for the status of banks being dispensed from the accounts of the dispensing. In addition, the ability to properly monitor transactions for potential suspicious activity is also a regulatory concern.

Our review of the Compliance Financial Network (CFN) program has allowed us to conclude that the system as envisioned would provide limited control and reporting that will meet industry standards for best practice. We believe that the CFN program would allow a

2010 Virtual Compliance Management Services LLC, Waco, TX 76798
www.vcmconsulting.com Phone: (767) 862-2554 Email: david@vcm.com

Financial institutions that do not properly track transactions, report potential suspicious activity and provide proper reporting.

We have attached a detailed discussion of our review to this document for your review.

Please feel free to contact me with any questions or concerns that you might have.

Sincerely,

James M. Leman

Sincerely,

David S. Leman
Principal
Virtual Compliance Management
2010 Virtual Compliance Management
Services LLC, Waco, TX 76798
Phone: (767) 862-2554
Email: david@vcm.com

2010 Virtual Compliance Management Services LLC, Waco, TX 76798
www.vcmconsulting.com Phone: (767) 862-2554 Email: david@vcm.com

FinCEN Guidance Memo



Department of the Treasury
Financial Crimes Enforcement Network

Guidance

FIN-2014-C001

Issued: February 14, 2014

Subject: BSA Expectations Regarding Marijuana-Related Businesses

The Financial Crimes Enforcement Network ("FinCEN") is issuing guidance to clarify Bank Secrecy Act ("BSA") expectations for financial institutions seeking to provide services to marijuana-related businesses. FinCEN is issuing this guidance in light of recent state initiatives to legalize certain marijuana-related activity and related guidance by the U.S. Department of Justice ("DOJ") concerning marijuana-related enforcement priorities. This FinCEN guidance clarifies how financial institutions can provide services to marijuana-related businesses consistent with their BSA obligations, and aligns the information provided by financial institutions in BSA reports with federal and state law enforcement priorities. This FinCEN guidance should enhance the availability of financial services for, and the financial transparency of, marijuana-related businesses.

Marijuana Laws and Law Enforcement Priorities

The Controlled Substances Act ("CSA") makes it illegal under federal law to manufacture, distribute, or dispense marijuana.¹ Many states impose and enforce similar prohibitions. Notwithstanding the federal ban, as of the date of this guidance, 20 states and the District of Columbia have legalized certain marijuana-related activity. In light of these developments, U.S. Department of Justice Deputy Attorney General James M. Cole issued a memorandum (the "Cole Memo") to all United States Attorneys providing updated guidance to federal prosecutors concerning marijuana enforcement under the CSA.² The Cole Memo guidance applies to all of DOJ's federal enforcement activity, including civil enforcement and criminal investigations and prosecutions, concerning marijuana in all states.

The Cole Memo reiterates Congress's determination that marijuana is a dangerous drug and that the illegal distribution and sale of marijuana is a serious crime that provides a significant source of revenue to large-scale criminal enterprises, gangs, and cartels. The Cole Memo notes that DOJ is committed to enforcement of the CSA consistent with those determinations. It also notes that DOJ is committed to using its investigative and prosecutorial resources to address the most

¹ Controlled Substances Act, 21 U.S.C. § 801, at 224.

² James M. Cole, Deputy Attorney General, U.S. Department of Justice, *Memorandum for All United States Attorneys: Guidance Regarding Marijuana Enforcement* (August 29, 2013), available at <http://www.justice.gov/iso/opa/resources/3052013829132756857467.pdf>.

www.fincen.gov

Department of Justice Memo



U.S. Department of Justice
Office of the Deputy Attorney General

The Deputy Attorney General

Washington, D.C. 20530

February 14, 2014

MEMORANDUM FOR ALL UNITED STATES ATTORNEYS

FROM: James M. Cole
Deputy Attorney General

SUBJECT: Guidance Regarding Marijuana-Related Financial Crimes

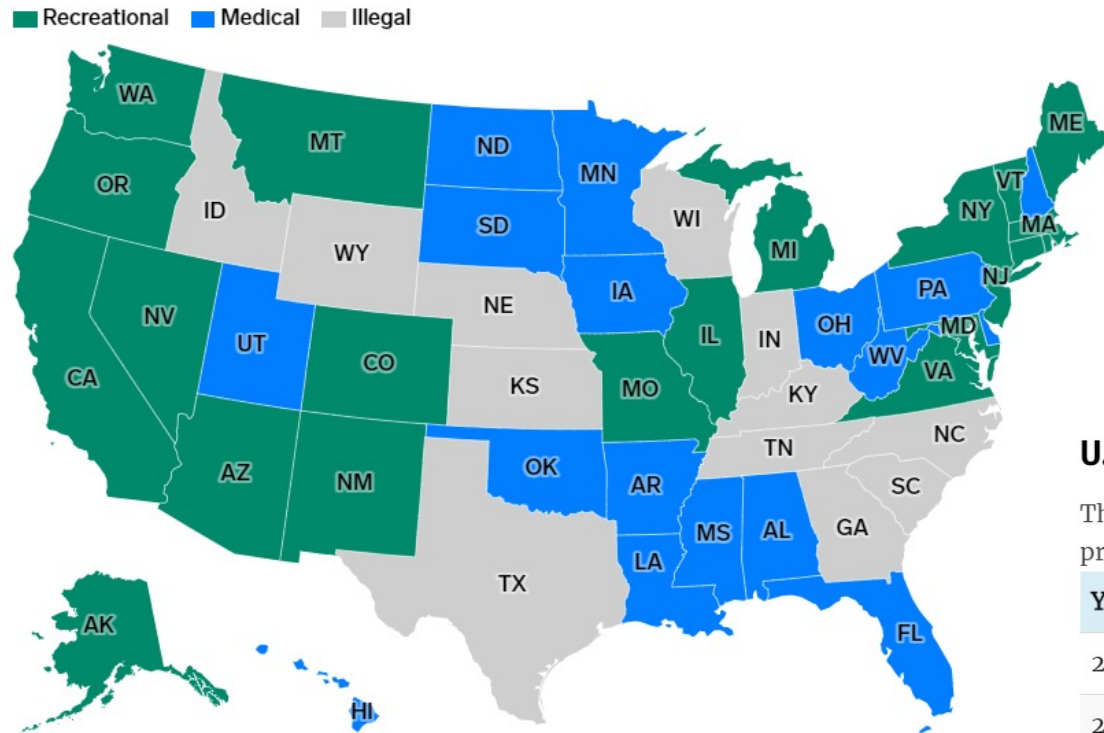
On August 29, 2013, the Department issued guidance (August 29 guidance) to federal prosecutors concerning marijuana enforcement under the Controlled Substances Act (CSA). The August 29 guidance reiterated the Department's commitment to enforcing the CSA consistent with Congress' determination that marijuana is a dangerous drug that serves as a significant source of revenue to large-scale criminal enterprises, gangs, and cartels. In furtherance of that commitment, the August 29 guidance instructed Department attorneys and law enforcement to focus on the following eight priorities in enforcing the CSA against marijuana-related conduct:

- Preventing the distribution of marijuana to minors;
- Preventing revenue from the sale of marijuana from going to criminal enterprises, gangs, and cartels;
- Preventing the diversion of marijuana from states where it is legal under state law in some form to other states;
- Preventing state-authorized marijuana activity from being used as a cover or pretext for the trafficking of other illegal drugs or other illegal activity;
- Preventing violence and the use of firearms in the cultivation and distribution of marijuana;
- Preventing drugged driving and the exacerbation of other adverse public health consequences associated with marijuana use;
- Preventing the growing of marijuana on public lands and the attendant public safety and environmental dangers posed by marijuana production on public lands; and
- Preventing marijuana possession or use on federal property.

Under the August 29 guidance, whether marijuana-related conduct implicates one or more of these enforcement priorities should be the primary question in considering prosecution



WHAT IS THE OPPORTUNITY?



Note: Updated as of Nov 9, 2022.

2023 Overall Market (U.S.)

- 38.8 billion sales in 2023
- 30.5% growth/year between 2018 – 2023
- 56,369 businesses

WIMEX Goals:

- 20-40% Market Penetration
 - 1,700 Locations
 - \$3.2 Billion in Deposits

U.S. cannabis retail sales estimates: 2021-26

The projected U.S. sales of cannabis through 2026, in billions of dollars according to projections from the 2022 MJBiz Factbook.

Year	Medical	Recreational	Combined
2021	\$10.5	\$16.5	\$27
2022	\$11.9	\$21.1	\$33
2023	\$13.2	\$25.6	\$38.8
2024	\$14.2	\$29.6	\$43.8
2025	\$15	\$33.3	\$48.3
2026	\$15.6	\$37	\$52.6

