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ENHANCED TIER

Enhanced Due Diligence Report on an Individual

SUBJECT

Mr James Edward Holloway

PREPARED FOR

Demonstration Sample
No Real Instructing Party

MATTER REFERENCE

BI-DD-2026-SAMPLE-ENH

REPORT TIER

Enhanced

£2,850 fixed fee · 15 working days

PREPARED BY

Blackout Intelligence Ltd
Senior Analyst, Enhanced Diligence

DATE OF REPORT

22 April 2026

DEMONSTRATION SAMPLE · The subject, entities, events and findings in this report are fictional composites constructed to illustrate the depth, rigour and methodology of a Blackout Intelligence Enhanced Tier engagement. No real individual is depicted. Compare with our Standard Tier sample to see the uplift.

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DOCUMENT CONTROL

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01. EXECUTIVE SUMMARY

Subject: Mr James Edward Holloway
Date of Birth: 14 March 1971 (verified)
Residence: Chertsey, Surrey (verified via Land Registry)
Occupation: Director, private investment and property companies
Nationality: British (verified via electoral roll corroboration)

OVERALL RISK ASSESSMENT

ELEVATED

Escalated from MEDIUM at Standard Tier following additional findings

Enhanced Tier enquiries, building on all findings reported at Standard Tier, identify additional matters that materially change the overall assessment. Land Registry and beneficial-ownership mapping across the subject's five active entities reveals a more complex asset position than self-disclosed. Our dark-web exposure scan identified the subject's historic credentials in three separate data breaches. Discreet peripheral-source enquiry (undertaken lawfully and without approach to the subject) has surfaced a previously unreported matter of concern.

Findings reported at Standard Tier, carried forward:

- Two unsatisfied CCJs totalling £47,382 (see §05).
- Compulsory strike-off of Meridian Holloway Lettings Ltd (2023).
- Inconsistent academic claim across public profiles (see §07).

New findings surfaced at Enhanced Tier:

- **Asset position materially larger than self-presented.** Land Registry mapping identifies a direct or beneficial interest in 11 residential properties across Surrey, Berkshire and Greater London, with an estimated aggregate market value of approximately £7.2–£8.4 million. Publicly-suggested portfolio size is 4–5 properties (see §03).
- **Undisclosed charge against principal residence.** A second charge was registered against the subject's Chertsey residence in February 2025 in favour of a private non-bank lender. No public statement or social-media reference made to this facility (see §04).
- **Dark-web credential exposure (three breach events).** Subject's email address and historic passwords appear in three verified breach corpora dated 2019, 2022 and 2024. No indication the subject has rotated credentials (see §06).
- **Peripheral-source matter.** A discreet enquiry to a single former business associate (conducted lawfully, without approach to or notification of the subject) elicited substantive reference to a 2020 dispute resolved outside the public record (see §08).

02. SCOPE AND ENHANCED UPLIFT

This Enhanced Tier report carries forward the full scope of the Standard Tier (identity, corporate, credit, sanctions, regulatory, adverse media, digital footprint, and closely-connected parties) and adds the following enhanced enquiry lines:

- **Comprehensive Land Registry mapping** — Index Map and Proprietorship Register searches across all candidate locations; corporate-held property interests traced via PSC chains.
- **Beneficial-ownership tracing** — Reconstruction of ownership chains through UK and identified offshore holding structures. Identification of silent partners, nominees, and undisclosed interests.
- **Dark-web and breach exposure analysis** — Scan of credential and PII exposure across breach corpora (2015–present), indicating operational security posture and potential compromise vectors.
- **Discreet peripheral-source enquiry** — Lawful, pretexted where permissible, discreet conversations with a small number of former business associates, counterparties or acquaintances. No approach to the subject; no deception rising to unlawful conduct. Full methodology and ethical posture recorded in §11.
- **Lifestyle observation (light-touch)** — Open-physical-space observation of publicly-visible lifestyle markers — residential frontage, vehicles on public access, leisure patterns indicated by publicly-posted content. No covert surveillance in this tier.
- **Counterparty mapping** — Identification of key counterparties to subject's entities — lenders, major tenants, investors, advisors — with risk screening on each.
- **Reconciliation against self-representation** — Systematic comparison between what the subject claims publicly and what the record evidences, with all divergences logged.

EXPLICITLY EXCLUDED FROM ENHANCED TIER

Covert physical surveillance, technical surveillance, communications interception, pretext contact with the subject, active deception rising to unlawful conduct, and any activity inconsistent with the Data Protection Act 2018, UK GDPR, the Regulation of Investigatory Powers Act 2000, the Investigatory Powers Act 2016, or the common law of privacy and confidence. These are addressed separately under our Covert Tier, which requires specific legal sign-off in advance of instruction.

03. ASSET POSITION

LAND REGISTRY MAPPING

Comprehensive Land Registry enquiry identifies the following interests held by the subject either personally or through active corporate vehicles in which he is a Person of Significant Control:

| # | Property (anonymised) | Held by | Est. Value | Charges |
|---|--|--------------------------------|------------|---------------|
| 1 | Detached, Chertsey (principal residence) | Personal | £1.85M | 2 (see §04) |
| 2 | Detached, Weybridge | Meridian Property Holdings Ltd | £2.10M | 1 |
| 3 | Terrace x 4, Reading | Surrey Residential Ltd | £1.42M | 1 (portfolio) |
| 4 | Terrace x 3, Slough | Surrey Residential Ltd | £0.96M | 1 (portfolio) |
| 5 | Flat x 2, Battersea SW11 | Holloway Capital Partners Ltd | £0.88M | 1 (portfolio) |
| 6 | Semi-detached, Guildford | JEH Lending Ltd (security) | n/a | Loan-held |

Estimated aggregate market value of the subject's direct and beneficial property interests: **£7.21M – £8.40M** (range reflects both Zoopla/PropertyData valuation bands and observed regional trajectory). Loan-held security under JEH Lending Ltd is not included in this aggregate — the subject's interest in that property is that of secured lender, not owner.

RECONCILIATION AGAINST SELF-PRESENTATION

| | |
|-------------|---|
| HIGH | <p>Material understatement of portfolio size in public narrative</p> <p>The subject's publicly-stated portfolio in a 2022 podcast appearance and 2024 LinkedIn commentary references "four or five properties" and describes himself as a "small investor." Land Registry evidence identifies 11 residential units beneficially traceable to the subject across the active corporate group, with aggregate value in the range £7.2m–£8.4m. Where the instructing party's matter turns on the subject's declared wealth or his reliability in representing his position, this material divergence is noted.</p> <p><i>Source: Land Registry Index Map and Proprietorship Register searches; PSC register; PropertyPod Ep. 42 (2022); LinkedIn posts (March, July 2024).</i></p> |
|-------------|---|

04. CHARGES AND INDEBTEDNESS

CHARGES REGISTERED

The following charges have been identified through Land Registry and Companies House enquiries:

| Secured Property / Entity | Chargee | Type | Registered |
|--------------------------------|-----------------------------------|------------------------------|------------|
| Principal residence, Chertsey | Major UK high-street lender | 1st charge (mortgage) | 2015 |
| Principal residence, Chertsey | Private non-bank lender (UK-regd) | 2nd charge | Feb 2025 |
| Meridian Property Holdings Ltd | Challenger bank | Debenture (all-assets) | 2018 |
| Surrey Residential Ltd | Specialist BTL lender | Portfolio charge | 2021 |
| Holloway Capital Partners Ltd | Specialist lender | 1st charge (Battersea units) | 2019 |

HIGH

Second charge on principal residence in favour of private lender

A second charge was registered against the subject's principal residence in February 2025 in favour of a UK-registered private non-bank lender. Private second charges on a principal residence, particularly where the chargee is a non-bank lender, are commonly associated with (a) short-term liquidity pressure, (b) inability to re-mortgage through mainstream channels, or (c) bridging against a planned but incomplete transaction. The subject has made no public reference to this facility. Aggregate personal indebtedness of the subject is therefore likely to be materially higher than Standard Tier enquiries suggested. Where the matter turns on the subject's covenant strength or liquidity, this finding is decisive.

Source: HM Land Registry Charges Register, title [anonymised] (Feb 2025).

05. FINANCIAL INTEGRITY

The County Court Judgments identified at Standard Tier are carried forward without amendment. At Enhanced Tier, we have additionally attempted identification of claimants and underlying cause:

- **Guildford CCJ (£31,847, Nov 2024)** — claimant identified from court record as a building contractor based in the Home Counties. Claim relates to unpaid invoices in respect of work at a property within the portfolio (Surrey Residential Ltd). No defence filed; judgment in default. Contractor trades normally and is not itself in distress.
- **Reading CCJ (£15,535, June 2023)** — claimant identified as a professional services firm (chartered surveyors). Claim for unpaid fees. Again, no defence filed.

Both judgments relate to commercial suppliers pursuing the subject personally rather than his corporate vehicles. Where a director-level client is the defendant in supplier-initiated CCJs relating to portfolio activity, this is typically an indicator of either (a) disputed work that has gone to judgment without full defence, or (b) persistent slow-payment behaviour. The pattern — two separate unrelated suppliers, within 18 months, both unsatisfied, both undefended — tilts toward the latter.

SAMPLE

06. DIGITAL EXPOSURE — DARK-WEB & BREACH DATA

Enhanced Tier enquiry includes scan of the subject's known email addresses, telephone numbers and identity fragments against major breach-data corpora and indexed dark-web mentions. Searches were conducted through legitimate, commercially-available breach-intelligence services (Have I Been Pwned, SpyCloud equivalents, and internal Blackout telemetry). No unlawful acquisition of data was undertaken.

| Breach Event | Year | Data Exposed | Status |
|-----------------------|------|--|-----------------|
| LinkedIn (scrape) | 2019 | Email, employment history, hash | Confirmed match |
| LastPass (auxiliary) | 2022 | Email, vault metadata (no plaintext) | Confirmed match |
| Major retailer breach | 2024 | Email, billing postcode, hashed password | Confirmed match |

No indication from available metadata that the subject has rotated credentials post-breach, nor that multi-factor authentication has been applied to exposed accounts. No dark-web chatter targeting the subject specifically has been identified. Exposure is consistent with a typical mid-profile professional individual — not elevated, but reflective of a moderate cybersecurity posture inconsistent with the subject's stated business activity in private lending (a sector where counterparties would reasonably expect higher operational security).

07. SELF-REPRESENTATION AGAINST RECORD

At Enhanced Tier we conduct a systematic reconciliation of the subject's public self-representation against the documentary record. The following divergences have been logged:

| Subject's public claim | Documentary record | Divergence |
|--|---------------------------------------|--|
| "Four or five properties" | 11 properties identified | Material |
| "Small investor" | £7.2m–£8.4m portfolio | Material |
| Exeter / Bristol / Durham (inconsistent across sources) | Not independently verified | Inconsistency between subject's own statements |
| "Senior banking roles" | Plausible; not independently verified | Unresolved |
| No public reference to CCJs | Two unsatisfied CCJs | Omission |
| No public reference to 2nd charge | 2nd charge registered Feb 2025 | Omission |

08. PERIPHERAL-SOURCE ENQUIRY

METHODOLOGY

Under Enhanced Tier instruction, a small number of lawful, discreet peripheral enquiries were undertaken with former business associates, counterparties or professional contacts of the subject. The principles observed were:

- No approach to, or notification of, the subject.
- No deception rising to unlawful conduct; where pretext was employed it was proportionate, non-actionable and recorded on file.
- No inducement, payment, or offer of benefit to any source.
- Records of each contact retained on file with date, medium, and contemporaneous notes.
- Information provided voluntarily by the source is reported here only in summary form, not verbatim, and without attribution.

FINDINGS

Reference to a 2020 commercial dispute resolved outside the public record

MEDIUM

A former business associate — contacted on a pretext unrelated to the subject, consistent with the principles recorded above — spontaneously referred to the subject in the course of conversation and characterised a 2020 commercial disagreement between the subject and a third party (not the source) as "settled quickly with no money changing hands but with some feathers ruffled." The source declined to elaborate and was not pressed. This reference is logged for the instructing party's situational awareness; it has not been independently corroborated, is second-hand, and should not be relied upon as evidence of any fact. Where material, a follow-up line of enquiry could be scoped.

Source: Peripheral-source conversation, 14 April 2026; notes retained on matter file.

Three other peripheral enquiries produced no material findings. Collectively, sources characterised the subject as "competent," "commercially ambitious," and "good at presenting." One source used the phrase "can be slow to pay." No source raised any matter of criminality, dishonesty in the strict sense, or regulatory concern.

09. LIFESTYLE INDICATORS

Enhanced Tier permits light-touch lifestyle observation: public-space observation of residential frontage, vehicles on public access, and verification of leisure patterns indicated in publicly-posted content. No covert surveillance was undertaken. Observations took place on two occasions across normal business hours, from publicly-accessible space.

| Category | Observation |
|---------------------|--|
| Principal residence | Detached property in professional condition. Well-maintained frontage, CCTV visible at two elevations. Estimated value £1.2m. |
| Vehicles | Range Rover Sport (as previously identified); Porsche Macan observed on second visit. Both on private driveway. |
| Household staff | One regular domestic cleaner observed (twice weekly, typical arrangement for household of this size). No other staff observed. |
| Sailing | Membership of named Solent-based yacht club corroborated via club's publicly-visible member-boat register. |
| Travel | Instagram content consistent with 2–3 European leisure trips per year (Mediterranean, Alps). No evidence of high-net-worth travel. |

Overall: observed lifestyle is consistent with declared asset position (once the larger portfolio is accounted for) and with material commercial activity. Nothing overtly inconsistent with legitimate income was observed.

10. RECOMMENDATIONS

- **Treat the subject's self-representation with appropriate caution.** — The pattern of material divergence between public claim and documented record is sufficient, on its own, to justify independent verification of any statement of wealth, portfolio or financial position provided by the subject.
- **Request full asset schedule with supporting documentation** — before any material commercial commitment is concluded. Compare against the position identified in §03 and §04 of this report.
- **Require formal disclosure of all secured liabilities** — including the Feb 2025 second charge. Material adverse change clauses in any contract should be tightly drawn.
- **Obtain the subject's written explanation** — for (a) the unsatisfied CCJs, (b) the academic-claim inconsistency, and (c) the 2020 matter referenced in §08 (if considered proportionate and appropriate in the matter's context).
- **Consider ongoing monitoring** — for the duration of any commercial relationship — at a minimum, quarterly CCJ, charges register, and insolvency-register refresh. Blackout Intelligence offers this under a fixed-fee monitoring subscription.
- **Escalate to Covert Tier only where strictly warranted** — and only with prior independent legal sign-off. Nothing in this report, on its face, mandates covert enquiry in the instructing party's matter.

11. METHODOLOGY, ETHICS & LIMITATIONS

LEGAL AND ETHICAL BASIS

All enquiry was conducted in accordance with the Data Protection Act 2018, UK GDPR, and the common law of privacy and confidence. Blackout Intelligence Ltd is registered with the Information Commissioner's Office. Processing of personal data in this matter is conducted under the lawful basis of legitimate interest (Article 6(1)(f)), supported by a formal Legitimate Interests Assessment retained on file, balancing the instructing party's legitimate need for due diligence against the rights and freedoms of the subject.

No enquiry was conducted that would fall within the statutory regime of the Regulation of Investigatory Powers Act 2000 or the Investigatory Powers Act 2016. No interception of communications, no covert human intelligence source as defined by those statutes, no use of equipment interference, and no directed surveillance for a continuous period sufficient to engage Part II RIPA has been conducted.

AGENT AUDIT™ EVIDENCE RECORD

This engagement has been conducted under our proprietary Agent Audit™ evidence-handling control layer. Every analyst action taken against the matter — including source acquisition, storage, retrieval, analysis, and reporting — is recorded in a tamper-evident, timestamped, attributable log. On reasonable request, the audit trail can be produced to the instructing party's legal advisors for inspection, and can be exhibited in proceedings where matters covered by this report come before a court or tribunal.

LIMITATIONS

All limitations stated in the Standard Tier report apply and are carried forward, with the following additional notes applicable to Enhanced findings:

- Asset aggregation at §03 reflects interests identifiable through public records; undisclosed overseas assets, trust-held beneficial interests, and holdings through non-UK corporate vehicles are not comprehensively addressed at Enhanced Tier.
- The peripheral-source reference at §08 is second-hand, uncorroborated, and should be treated as situational context only — not as evidence of fact in any proceedings.
- Breach-data scan at §06 reflects data made available by the named intelligence services to the date of scan; newer breaches not yet indexed at that date are not captured.
- This report remains a point-in-time document. A refresh is recommended before reliance in proceedings or material commercial commitment if more than 90 days have elapsed since the date on the cover page.

REPORT PREPARED AND ISSUED BY

Prepared by: Blackout Intelligence — Enhanced Diligence Desk
On behalf of: Blackout Intelligence Ltd (UK)
Date of issue: 22 April 2026
Contact: dan@blackoutintelligence.co.uk · blackoutintelligence.co.uk

— END OF REPORT —



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