

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON/GREENWOOD DIVISION**

IN RE:RECEIVER FOR) Civil Action No. 8:12-cv-2078-JMC
RONNIE GENE WILSON AND)
ATLANTIC BULLION & COIN, INC.)

**PETITIONER'S REPLY TO RESPONDENT'S RESPONSE TO COURT'S ORDER
TO SHOW CAUSE**

Counsel for the Receiver, Beattie B. Ashmore, appointed by this Court most recently pursuant to a February 14, 2013 Order ("Court Order") files this Reply to Masterpiece Investments Corp.'s ("MPI") Response to the Court's November 4, 2013, Order (ECF No. 80) in which the Court ordered MPI to either produce documents or demonstrate why such documents should not have to be produced.

In their Response, MPI asserts that the transaction with Ronnie and Cassie Wilson/AB&C was a valid securities transaction but fails to produce documents previously requested and fails to assert why the documents should not be produced. As stated before, the Receiver needs the requested documents to fully and properly evaluate the position set forth by MPI. MPI has failed to comply with the Court Order which requires cooperation with the Receiver and has thus far refused to produce the documents needed for the Receiver to fully evaluate the transfer of Ponzi funds to MPI. (Court Order, ECF No. 43.)

Therefore, the Receiver respectfully asks the Court to order MPI to produce the documents previously requested on or before March 3, 2014. (Pet. Rule Show Cause, ECF

No. 69-4.) Further, if the Court orders such production and MPI fails to produce documents as ordered, the Receiver respectfully asks the Court to order the repayment of \$350,000.00 on or before March 31, 2014.

Respectfully submitted,

THE TOLLISON LAW FIRM, P.A.

/s/L. Walter Tollison, III

L. Walter Tollison, III

Federal Bar No. 4117

Walt.tollison@thetollisonlawfirm.com

/s/Lauren S. Price

Lauren S. Price

Federal Bar No. 10406

Lauren.price@thetollisonlawfirm.com

24 Vardry Street, Suite 203

Greenville, South Carolina 29601

Phone: (864) 451-7038

Fax: (864) 451-7591

Attorneys for the Receiver

February 14, 2014
Greenville, South Carolina