

**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.)

REPLY

Counsel for the Receiver, Beattie B. Ashmore, appointed by this Court most recently pursuant to a February 14, 2013 Order (“Court Order”) submits this Reply to the Court’s Order to Show Cause issued on June 26, 2014, in relation to documents received by the Receiver from counsel for Tracy Neily (“Neily”) with regard to whether Neily should be ordered to repay funds that represent ill-gotten monies of the fraudulent investment scheme orchestrated and carried out by Ronnie Gene Wilson (“Wilson”) and Atlantic Bullion & Coin, Inc. (“AB&C”). Based upon the reasons set forth below, the Receiver submits that the Court should order Neily to repay the ill-gotten money and submit to discovery as set forth below.

Specifically, in response to the Court’s June 26, 2014 Order to Show Cause, Neily provided the Receiver documents including, but not limited to, tax returns for the years 2000 - 2010. Interestingly no tax returns were submitted for the year 2011, a year for which the Receiver’s records indicate Neily netted approximately \$600,000.00 from Ronnie Gene Wilson and Atlantic Bullion & Coin, Inc. No documents have been provided to the Receiver that would change, alter or diminish the relief sought by the Receiver in the original Petition

for Rule to Show Cause (“Petition”) (ECF Doc No. 98) and therefore no good cause has been demonstrated. For these reasons, the Receiver requests that the Court order Neily to repay the monies as set forth in Exhibit A to the Petition and order that Neily be subject to full and unrestricted discovery including, but not limited to, appearing for deposition, until the money is paid back in full. In sum, the Receiver would seek the same relief the Court ordered with respect to her ex-husband. (ECF Doc. No. 105.)

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

August 21, 2014
Greenville, South Carolina