

**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.)

MOTION TO AMEND ORDER OF APPOINTMENT

Counsel for the Receiver, Beattie B. Ashmore, appointed by this Court originally by text order on June 14, 2012 and as amended on July 25, 2012 Order and February 14, 2013 (“Court Order”) as Receiver for Ronnie Gene Wilson (“Wilson”), Atlantic Bullion and Coin, Inc. (“AB&C”) and related persons and entities (collectively “AB&C Receivership Entities”) moves the Court to Amend the Court Order to add Gordon L. Hall and Benton T. Hall (the “Halls”), limited solely to the Halls’ financial connection to Wallace Lindsey Howell (“Howell”), Wilson and AB&C and the corresponding criminal convictions.

On July 30, 2012, Wilson and AB&C pled guilty to two counts of mail fraud stemming from their involvement in a criminal Ponzi scheme involving hundreds of victims and millions of dollars. *See United States v. Ronnie Gene Wilson, et al*, 8:12-cr-320-JMC. In connection with the Wilson-AB&C criminal action, the Court Order appointed the Receiver and tasked him with assuming management and control over all the financial and business affairs for a number of individuals and companies collectively referred to as the AB&C Receivership Entities. The Court Order requires the Receiver, among other things, to locate and manage assets previously acquired by and/or in the name/possession of the AB&C

Receivership Entities. In addition, the Court Order directs the Receiver to take whatever actions necessary for the protection of investors, including, but not limited to, initiating actions against individuals or companies to whom monies or assets were transferred that are directly traceable to the unlawful Ponzi scheme run by Wilson and AB&C. *See* February 14, 2013 Court Order at 2-3.

On October 9, 2012, Howell was indicted by a grand jury on one count of conspiracy to commit mail fraud based upon his connection to Wilson-AB&C and the Ponzi scheme he orchestrated. *See United States v. Howell*, 8:12-791. Howell pled guilty, and was sentenced to a twelve month term of imprisonment. Because Howell's criminal conduct was related to the fraudulent investment scheme involving the entities for which the Receiver was appointed and the Receiver was in possession of information and data showing Howell, directly or indirectly, profited over \$3 Million from the Ponzi scheme, the Court amended the Order of Appointment to include Wallace Lindsey Howell, and his family members, businesses and purported trusts including, but not limited to, Julie A. Asset Management Trust, the Kingdom Estate Trust, Wallace Lindsey Howell Trust, Bill Porter Construx Home, WMA World Marketing, Upstate OSR, Protective Solutions, and RHYS & Company, LLC.

Thereafter, on March 12, 2013, the Halls were indicted on multiple counts stemming from the Halls involvement with Howell, Wilson and AB&C. Specifically, the Superseding Indictment charged that "Defendants, GORDON L. HALL, BENTON T. HALL, and Wallace Lindsey Howell [as co-conspirators did] ... impede the due administration of justice in the investigation and prosecution of *United States v. Ronnie Gene Wilson, et al.*, No. 8:12-320, and in the investigation and prosecution of *In re Receiver for Ronnie Gene Wilson, et al.*, No. 8:12-2078, by hiding and transferring of assets derived from, or traceable to,

proceeds from a Silver Ponzi Scheme operated by Ronnie Gene Wilson....” See *United States v. Hall, et al*, 6:13-170. Gordon L. Hall proceeded to plead guilty to count two of the superseding indictment and was sentenced to a one hundred eighty month term of imprisonment. Benton T. Hall pled guilty to one count of the superseding indictment and was sentenced to a twenty-four month term of imprisonment. Additionally, the Halls were ordered to pay \$172,254.00 in restitution.

Pursuant to a search warrant executed on the Hall home in 2013, a number of assets (“Assets”) were seized and remain in the custody of the United States Secret Service. These items include coins, jewelry and cash. As reflected by the restitution award, records indicate the Halls were in possession of approximately \$170,000.00 in assets related directly or indirectly to the Howell, Wilson & AB&C fraudulent investment scheme. Because Hall’s criminal conduct is directly related to monies flowing from the fraudulent investment scheme involving the entities for which the Receiver is appointed and the Receiver is in possession of information and data showing the Halls, directly or indirectly, profited from the Ponzi scheme, the Receiver moves the Court to amend the Order of Appointment to add Gordon L. Hall and Benton T. Hall, limited solely to the Halls’ financial connection to Howell, Wilson and AB&C and the corresponding criminal convictions. Additionally, the Receiver asks the Court to direct the United States Secret Service to transfer the Assets into the custody of the Receiver and allow the Receiver to convert the Assets for the benefit of the victims of the Wilson-AB&C fraudulent investment scheme. Assistant United States Attorney William J. Watkins, Jr. has been consulted and consents to the relief sought herein.

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

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Greenville, South Carolina