

**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Beattie B. Ashmore, appointed by this Court pursuant to an Order filed on July 25, 2012 Order, thereafter replaced and superseded by Order filed on October 17, 2012, February 14, 2013, and January 13, 2015 (“Court Order”) as Receiver for Ronnie Gene Wilson (“Wilson”), Atlantic Bullion and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 remove Gordon L. Hall and Benton T. Hall (the “Halls”), originally added to the Court Order limited solely to the Halls’ financial connection to Wallace Lindsey Howell (“Howell”), Wilson and AB&C and the corresponding criminal convictions.

Pursuant to a search warrant executed on the Hall home in 2013, a number of assets (“Assets”) were seized and in the custody of the United States Secret Service. These items included coins, jewelry and cash. As reflected by the restitution award, records indicated 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 was directly related to monies flowing from the fraudulent investment scheme involving the entities for which the Receiver is appointed and the Receiver was in possession

of information and data showing the Halls, directly or indirectly, profited from the Ponzi scheme, the Court amended 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 Court directed 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.

Having liquidated the Assets, the Receiver is now of the belief that there is no potential benefit to the victims from the Receiver's control over the Halls and hereby moves the Court to remove the Halls from the Court Order.

Respectfully submitted,

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Greenville, South Carolina