

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

UNITED STATES OF AMERICA	)	Civil Action No. 8:12-cv-2078-JMC
	)	
v.	)	
	)	
RONNIE GENE WILSON	)	
ATLANTIC BULLION & COIN, INC.,	)	
	)	
Defendants.	)	
_____	)	
	)	
IN RE:RECEIVER FOR	)	
RONNIE GENE WILSON AND	)	
ATLANTIC BULLION & COINC, INC.	)	

**MOTION TO AMEND ORDER OF APPOINTMENT**

Counsel for the Receiver, Beattie B. Ashmore, appointed by this Court pursuant to a July 25, 2012 Order (“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 Wallace Lindsey Howell (to include family members, businesses and purported trusts), and Tracy Neily (to include family members, businesses not already named and purported trusts).

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 above noted 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 AB&C. 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* July 25, 2012 Court Order at 2-3.

Subsequently, on October 9, 2012, Wallace Lindsey Howell (“Howell”) was indicted by a grand jury on one count of mail fraud. In addition, the indictment contains forfeiture allegations. The criminal case involving Howell is related to the underlying criminal case involving the Receiver as indicated in the allegations set forth in the indictment. Because Howell’s alleged criminal conduct is related to the fraudulent investment scheme involving the entities for which the Receiver has been appointed and the Receiver is in possession of information and data showing Howell, directly or indirectly, profited over \$3 Million from the Ponzi scheme, the Receiver respectfully requests that Wallace Lindsey Howell, to include 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, be added to the Court Order.

In addition, upon review of the records obtained by the Receiver, it has become apparent that Tracy Neily, individually and through companies already subject to the Court Order, operated as an alter-ego of Wilson and/or AB&C and thus should be added to the Court Order. The Receiver is in possession of data showing that Neily, directly or indirectly, profited substantially from the Ponzi scheme and, in concert with Wilson, diverted funds

directly to her and her family members. Specifically, the Receiver requests that the Court add Tracy Neily to include family members, businesses not already named and purported trusts to the Court Order. As such, the Receiver respectfully requests the Court grant its Motion to Amend the Order of Appointment as set forth above.

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](mailto:Walt.tollison@thetollisonlawfirm.com)

/s/Lauren S. Price

Lauren S. Price

Federal Bar No. 10406

[Lauren.price@thetollisonlawfirm.com](mailto: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**

October 12, 2012  
Greenville, South Carolina