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, amended on October 17, 2012, ("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 Gibwell Mission Fleet, LLC ("Gibwell"), a business created, controlled or utilized by Lindsey Howell.

Specifically, on January 1, 2010, an RV was purchased for Lindsey Howell ("Howell") from Camping World with funds originating from an AB&C account. *See* AB&C check written to Camping World for Howell attached hereto as Exhibit A. The RV was titled in the name of Gibwell. *See* Certificate of Title issued on February 15, 2010 attached hereto as Exhibit B. Based upon information and belief, the RV was purchased with cash and the trade of an existing RV. The cash portion of the sale was One Hundred Fourteen Thousand Dollars (\$114,000.00). *See* Exhibit A.

Based upon additional information, the Receiver has learned that the RV was subsequently sold through a company called RVMAX/Grant's Auto Sales on Laurens Road in Greenville, South Carolina to RV Shop in Baton Rouge, LA. The sales representative's name was Sachin Shah and he facilitated the transfer of a cashier's check to Howell made payable to Gibwell for One Hundred Five Thousand Dollars (\$105,000.00), plus an additional amount that purportedly occurred via wire transfer. *See* Cashier's Check written to Gibwell attached hereto as Exhibit C. The check was endorsed "For Deposit Only" and deposited into an account at Bank of America, N.A. *See* Copy of check endorsement attached hereto as Exhibit D.

As such, it is clear that Gibwell is a company that was created, controlled or utilized by Howell and done so for the sole purpose of hiding assets. As such, the Receiver respectfully requests the Court grant its Motion to Amend the Order of Appointment and add Gibwell Missions Fleet, LLC. The Receiver has consulted with the Government and the Government consents to the granting of this motion.

Respectfully submitted,

THE TOLLISON LAW FIRM, P.A.

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Attorneys for the Receiver

November 6, 2012 Greenville, South Carolina

EXHIBIT A

8:12-cv-02078-JMC Date Filed 11/06/12 Entry Number 25-1 Page 2 of 2

Account Number:

16451

Capture Date:

January 15, 2010

Item Number: Posted Date:

5250163412208 January 15, 2010

Posted Item Number: 1450

Serial Number:

12129

Amount:

\$114,000.00

ATLANTIC BULLION & COIN INC 203 SILOAM ROAD EASLEY SC 29642

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EXHIBIT B

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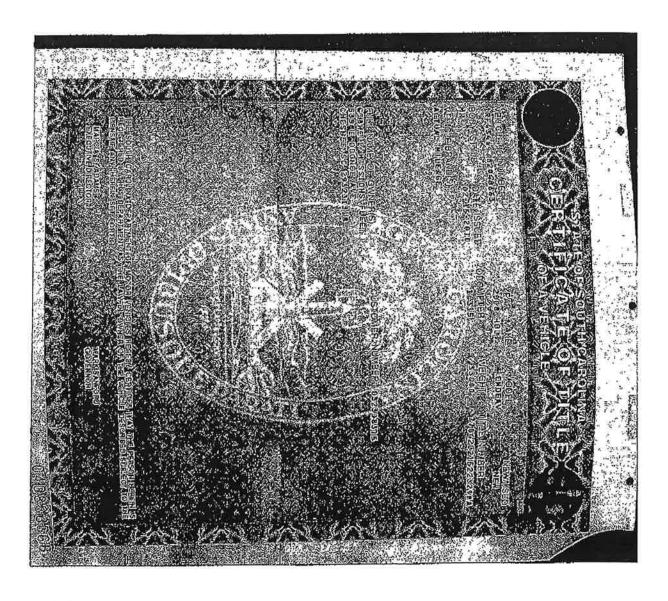


EXHIBIT C

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EXHIBIT D

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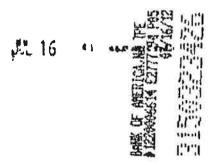
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