

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

IN RE:)	NO. 3:07-mc-135
)	
A MATTER UNDER INVESTIGATION)	PETITION TO LIQUIDATE
BY GRAND JURY NUMBER 1)	ASSET
(#2007R00845))	

Comes now counsel for the Receiver, Beattie B. Ashmore, appointed by this Court via Order filed, UNDER SEAL, on September 5, 2007, seeking permission to liquidate a certain asset now under the control of the Receiver.

On September 5, 2007, by Order of this Court, the Receiver took over all the financial and business affairs for a number of individuals and companies (collectively, 3HB). On or about March 1, 2007, a 2006 Prevost Motorcoach, VIN 2PCY3349361028988 ("Prevost") was purchased for the personal use and benefit of the 3HB. The Prevost was acquired from Amadas Coach for a price of \$925,000.00. The Prevost was titled in the name of Daniel Development Group and paid for from funds existing in a bank account at Bank of America titled "Brunson Outreach/Capital Consortium Group #2". (Exhibit A). Both of these entities are subject to this Court's Order of September 5, 2007. The Prevost was seized by the FBI on or about September 19, 2007 and subsequently turned over to the possession and control of the Receiver. The Receiver has been in control of the Prevost since November 20, 2007. The Receiver has incurred expenses in repairing, servicing and storing the Prevost. (Exhibit B).


The Receiver is now of the unconditional belief that the Prevost should be sold and that

there is a significant and viable market for acquiring this asset at a price similar to its value. Attached for the Court's review and consideration is an appraisal conducted by Amadas Coach on November 29, 2007, establishing a value between \$625,000.00 and \$795,000.00 for the sale of the Prevost on the open market. (Exhibit C).

Based upon facts known to the Receiver, the Prevost is unencumbered and free and clear of any liens. It is currently insured by Progressive Insurance Company and the quarterly premium of \$2001.75 has been paid by the Receiver. The property taxes on the Prevost are expected to be \$39,582.00, due in April 2008, and the title has been secured from the S.C. Department of Motor Vehicles. The expert consultant retained by the Receiver to manage this asset is of the opinion that this asset depreciates daily.

Therefore, in order to achieve the highest and best return for the value of this specific asset (2006 Prevost), and being of the belief that maintaining this asset will only cause further depreciation and depletion of funds, the Receiver seeks this Court's permission to allow him to sell the Prevost Motorcoach, VIN 2PCY3349361028988, for an amount no less than \$625,000.00 as set forth in the aforementioned appraisal. Assistant United States Attorney, Winston Holliday, consents to this motion.

I SO MOVE.



L. Walter Tollison, III
The Tollison Law Firm, P.A.
24 Vardry Street, Suite 203
Greenville, SC 29601
Counsel for the Receiver

Columbia, South Carolina

January 29, 2008

DEC-12-2007 15:15

Page 13 of 17
 Statement Period
 02-03-07 through 03-07-07
 Number of checks enclosed: 0
 B 03 0 A P 03 00503

BRUNSON OUTREACH
 CAPITAL CONSORTIUM GROUP #2

Account Number: 0007 8073 7318

Regular Checking Subtractions

Checks Posted - Continued

Check Number	Date Posted	Amount(\$)	Check Number	Date Posted	Amount(\$)	Check Number	Date Posted	Amount(\$)
13133	03-02	700.00	13160*	03-05	1,000.00	13183*	03-07	2,670.00
13134	03-06	1,500.00	13163*	03-02	500.00	13190*	03-06	2,250.00
13135	03-02	2,500.00	13165*	03-02	100.00	13196*	03-06	1,065.00
13141*	03-01	500.00	13166	03-05	300.00	13200*	03-05	3,120.00
13142	03-05	500.00	13167	03-02	1,000.00	13208*	03-06	495.00
13143	03-05	500.00	13168	03-06	2,670.00	13209	03-06	330.00
13150*	03-06	100.00	13169	03-07	1,245.00	13210	03-06	3,930.00
13152*	03-05	500.00	13173*	03-05	2,310.00	13216*	03-07	7,060.70
13153	03-02	1,500.00	13174	03-02	3,075.00	13229*	03-07	120.86
13154	03-07	50.00	13176*	03-05	465.00			
13158*	03-06	100.00	13180*	03-06	3,480.00			

Total Checks Posted

\$2,357,986.55

* The asterisk shows a break in the check number order. Your check may have been in a previous statement or may still be outstanding.

Service Charges and Other Fees

	Date Posted	Amount(\$)
Wire Transfer Fee	02-06	25.00
Wire Transfer Fee	02-06	25.00
Wire Transfer Fee	02-13	45.00
Wire Transfer Fee	02-26	25.00
Wire Transfer Fee	03-01	25.00
Wire Transfer Fee	03-01	25.00
Wire Transfer Fee	03-02	25.00
Wire Transfer Fee	03-05	45.00
Wire Transfer Fee	03-05	5.00
Returned Item Chargeback Fee		
Total Service Charges and Other Fees		\$245.00

Other Subtractions

	Date Posted	Amount(\$)
Paypal ;Des= transfer ;ID= 5H9222Sge5Pqa Eff Date: 070205;Indn:3 Hebrew Boys	02-05	4,995.00
American Express;Des= collection;ID= 4390395150 Eff Date: 070205;Indn:Capital Cons4390395150	02-05	5.95
Counter Debit	02-06	370,229.38
Wire Type:Wire Out Date:070206 Time:1722 E; Trn:2007020600234170 Service Ref:004043 Bnf:Bizjet ID:30563533 Bnf Bk:Citibank N A ID:0210 00089 Pmt Det:01070206007065Nn	02-06	176,920.00
Counter Debit	02-06	86,238.90
Wire Type:Wire Out Date:070206 Time:1644 E; Trn:2007020600223139 Service Ref:003790 Bnf:Blue Star Jets ID:036501419165 Bnf Bk:Jpmorgan Chase Bank, N. ID:021000021 Pmt Det:0107020600703 9Nn/Acc/Fbo Blue Star Jets	02-06	6,982.13
Northern Leasing;Des= lease Pmt ;ID= 0457297:0205 Eff Date: 070206;Indn:Capital Consortium Gro	02-06	87.13
American Express;Des= collection;ID= 4390395150 Eff Date: 070206;Indn:Capital Cons4390395150	02-06	28.00
Counter Debit	02-07	200,000.00

Deposit

EXHIBIT

A

BRUNSON OUTREACH
CAPITAL CONSORTIUM GROUP #2

Statement Period
02-03-07 through 03-07-07
Number of checks enclosed: 0
B 03 0 A P 03 00503:

Account Number: 0007 8073 7318

Regular Checking Subtractions

Other Subtractions - Continued	Date Posted	Amount(\$)
Wire Type:Wire Out Date:070226 Time:1510 Et Trn:2007022600228739 Service Ref:003799 Bnf:Blue Star Jets ID:036501419165 Bnf Bk:Jpmorgan Chase Bank, N. ID:021000021 Pmt Det:01070226000979 ONN/Acc/Fbo Blue Star Jets	02-26	20,199.00
Paypal ;Des= transfer ;ID= 5H9222T3Rb4E Eff Date: 070226;Indn:3 Hebrew Boys	02-26	4,500.00
Counter Debit	02-27	998,959.37
Non-Cash Deposit Correction	02-27	6,251.25
Counter Debit	02-27	6,000.00
Counter Debit	02-27	655.33
SC Tlr transfer to Chk 6003 Banking Ctr Eau Claire #0070702 SC Confirmation# 2587614653	02-27	125,000.00
SC Tlr transfer to Chk 5177 Banking Ctr Eau Claire #0070702 SC Confirmation# 2587481883	02-27	36,111.00
Counter Debit	02-28	422,889.69
SC Tlr transfer to Chk 5177 Banking Ctr Eau Claire #0070702 SC Confirmation# 2679221564	02-28	12,000.00
SC Tlr transfer to Chk 5177 Banking Ctr Eau Claire #0070702 SC Confirmation# 2688359480	02-28	11,900.00
Bellsouth ;Des= bill Pymnt;Check #:7670 Eff Date: 070228;Indn:	02-28	2,341.41
Bellsouth ;Des= bill Pymnt;Check #:7668 Eff Date: 070228;Indn:8037881113001	02-28	827.79
Wire Type:Wire Out Date:070301 Time:0932 Et Trn:2007030100115179 Service Ref:001473 Bnf:Coach, Llc. DbA Amadas Coa ID:0371060101 Bnf Bk:Farmers Bank ID:051405670 Pmt Det:010703010 00096Nn	03-01	725,000.00
Wire Type:Wire Out Date:070301 Time:1312 Et Trn:2007030100197493 Service Ref:003227 Bnf:Coach, Llc. DbA Amadas Coa ID:0371060101 Bnf Bk:Farmers Bank ID:051405670 Pmt Det:010703010 04751Nn	03-01	50,000.00
Paypal ;Des= transfer ;ID= 5H9222T7Apfun Eff Date: 070301;Indn:3 Hebrew Boys	03-01	4,750.00
Lfg ;Des= lease Pymt;ID= 001-0659399-000 Eff Date: 070301;Indn:Capital Consortium Gro	03-01	99.90
Northern Leasing;Des= lease Pmt ;ID= 0457297:0301 Eff Date: 070301;Indn:Capital Consortium Gro	03-01	79.05
Eps Debit Statem;Des= epsdebit ;ID= Eff Date: 070301;Indn:3 Hebrew Boys	03-01	10.00
Eps Debit Statem;Des= epsdebit ;ID= Eff Date: 070301;Indn:E Hebrew Boys	03-01	10.00
Wire Type:Wire Out Date:070302 Time:1146 Et Trn:2007030200144622 Service Ref:001795 Bnf:Coach Llc. DbA Amadas Coac ID:0371060101 Bnf Bk:Farmers Bank ID:051405670 Pmt Det:010703020 02004Nn	03-02	250,000.00

Folk Pymnt

Exhibit B

Expenses Paid for Prevost

• Progressive Insurance	Quarterly Payment	\$2001.75	11/27/07
• American Express	Holiday Kamper	\$1058.31	12/12/07
• Belton O'Neall	Copy of Title from DMV	\$ 20.00	1/15/07
TOTAL		\$3080.06	

Expected Expenses for Prevost

• Howie's Auto Service	Detail	\$ 1000.00	
• David Simmons	3 months storage	\$ 300.00	
• Richland County	Property Taxes	\$39,582.00	4/2008
• Jean's Bus Service	Battery Purchase	\$ 300.00	
• Progressive Insurance	Quarterly Payment	\$ 1979.75	2/27/08
TOTAL		\$43161.75	



November 29, 2007
Reference: Prevost XL-II 45 VIN: 28988

Dwight C. Price
FBI Columbia Field Office
151 Westpark Boulevard
Columbia, SC 29210

Mr. Price,

This letter offers my appraisal of the value of Prevost XL-II 45 VIN: 28988 as a motorcoach industry professional. This opinion is based on my knowledge of the coach and the market, and information your office has provided on the current condition of the coach.

Prevost XL-II 45 VIN:28988 was converted as an Executive / VIP style coach by Amadas Coach on a 45' Prevost XL-II "Entertainer" model shell featuring a single front slide-out. The shell was completed by Prevost in 2006, and the completed by Amadas Coach in late 2006, as a 2007 model year unit.

The coach was delivered to the end user in early 2007 at a purchase price of \$925,000.00. The coach is reported to currently have 17,810 miles, 396 generator hours, and to be in excellent condition.

This coach is a rare Executive / VIP conversion, which command high resale value, although demand is often sporadic. A survey of the current marketplace for comparable units reveals that there are very few available, and none closely matching 28988's features. As such, I believe the coach should retail for \$795,000.00, assuming adequate time and effort is given to marketing the coach. If the coach were to be offered at wholesale for an expedited sale, I believe the coach should bring \$625,000.00.

The only comparable coaches I have located in the market are:

- 2007 Prevost H3-45 VIP / Executive coach, currently listed for \$895,000.00 (retail).
- 2008 Prevost H3-45 VIP / Executive coach, currently listed for \$955,000.00 (retail).

The opinion I offer on the value of Prevost XL-II 45 VIN: 28988 is based on the coach being in excellent condition. It is important that the coach is stored and maintained properly to best retain its value.

Cordially,

James C. Adams, III

Amadas Coach Corporation
1007 Obiel Industrial Blvd. Suffolk, VA 23434
Tel: 757-925-2862 Fax: 757-925-2803

EXHIBIT
C

The Tollison Law Firm, P.A.

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Fax: 864-451-7591
walt.tollison@thetollisonlawfirm.com

January 29, 2008

VIA ELECTRONIC TRANSMISSION AND UPS

The Honorable Margaret B. Seymour
United States District Judge
District of South Carolina
ATTN: Mary Deal
901 Richland Street
Columbia, SC 29201

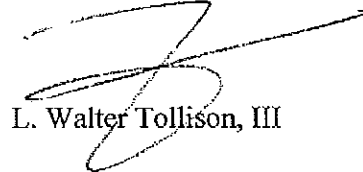
Re: Three Hebrew Boys
A Matter Under Investigation By Grand Jury 1
No. 3:07 -mc-135

Dear Judge Seymour,

Enclosed for filing UNDER SEAL are an original and one (1) copy of the Petition to Liquidate Asset. Also, enclosed is a copy for Your Honor's use.

With highest regards, I remain,

Very truly yours,



L. Walter Tollison, III

Enclosure

Cc: Beattie B Ashmore, Receiver 3HB
All Counsel of Record