

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

UNITED STATES OF AMERICA)	CR. NO. <u>8:12-320</u>
)	18 U.S.C. § 1341
vs.)	18 U.S.C. § 2
)	18 U.S.C. § 981(a)(1)(C)
RONNIE GENE WILSON)	28 U.S.C. § 2461(c)
ATLANTIC BULLION & COIN, INC.)	<u>INFORMATION</u>

COUNT 1

THE UNITED STATES ATTORNEY CHARGES:

1. That beginning in or about January 2001, and continuing until in or about March 2012, the Defendants, RONNIE GENE WILSON and ATLANTIC BULLION & COIN, INC., did knowingly devise a scheme and artifice to defraud and to obtain monies by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME AND ARTIFICE

2. It was a part of the scheme and artifice to defraud that RONNIE GENE WILSON was the President and sole shareholder of ATLANTIC BULLION & COIN, INC. (hereinafter "AB&C").

3. It was further part of the scheme and artifice that RONNIE GENE WILSON and AB&C encouraged clients to invest in silver.

4. It was further part of the scheme and artifice that RONNIE GENE WILSON and AB&C represented to clients that their silver would be held at a depository located in Delaware.

5. In was further part of the scheme and artifice that RONNIE GENE WILSON and

AB&C did not purchase silver in sufficient quantities when asked to do so by clients.

6. It was further part of the scheme and artifice that RONNIE GENE WILSON and AB&C did not have silver holdings at a depository located in Delaware.

7. It was further part of the scheme and artifice that RONNIE GENE WILSON and AB&C created fraudulent account statements showing that clients owned large quantities of silver when, in fact, no silver had been purchased for the clients.

8. It was further part of the scheme and artifice that RONNIE GENE WILSON and AB&C used monies supplied by later clients to pay earlier clients who asked to liquidate all or a portion of their silver holdings. In this manner, the investment program operated by RONNIE GENE WILSON and AB&C was a "Ponzi scheme."

9. It was further part of the scheme and artifice that RONNIE GENE WILSON converted client funds to his own use to support a lavish lifestyle.

10. It was further part of the scheme and artifice that RONNIE GENE WILSON and AB&C caused losses to clients of approximately \$59 million during the course of the scheme and artifice to defraud.

MAILING IN FURTHERANCE OF SCHEME AND ARTIFICE

11. On or about October 29, 2009, in the District of South Carolina and elsewhere, for the purpose of executing the above-described scheme and artifice to defraud, RONNIE GENE WILSON and AB&C knowingly caused AB&C customer number 91277 to mail checks from Louisville, Kentucky, to AB&C in Easley, South Carolina.

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNT 2

THE UNITED STATES ATTORNEY FURTHER CHARGES::

1. The allegations of paragraphs 1 through 10 of Count 1 in this information are alleged herein as setting forth a scheme and artifice to defraud.

2. On or about January 30, 2012, in the District of South Carolina and elsewhere, for the purpose of executing the scheme and artifice to defraud, RONNIE GENE WILSON and AB&C knowingly mailed a fraudulent AB&C account statement to customer number 12232 from Easley, South Carolina, to Acton, Massachusetts.

In violation of Title 18, United States Code, Sections 1341 and 2.

FORFEITURE

A. **SPECIFIED UNLAWFUL ACTIVITY - MAIL FRAUD**

1. Upon conviction for violation of Title 18, United States Code, Sections 1341 as charged in Counts 1 and 2 of this Information, the Defendant, RONNIE GENE WILSON, and ATLANTIC BULLION & COIN, INC., shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendants obtained directly or indirectly as a result of such offenses, including, but not limited to the following:

B. The property subject to forfeiture includes, but is not limited to, the following:

1. **CASH PROCEEDS/MONEY JUDGMENT:**

- a. A sum of money equal to all proceeds the Defendants obtained directly or indirectly from the offense charged in Count 1 of the Information, that is, a minimum of approximately \$59,000,000 in United States currency, and all interest and proceeds traceable thereto, including but not limited to the following, for which the Defendants are jointly and severally liable:
- b. \$47,213 in US currency seized from 900 East North Street, Greenville, SC, on 3/23/12;
- c. \$3,820 in US currency seized from 900 East North Street, Greenville, SC, on 3/16/12;
- d. \$16,541 in US currency seized from 203 Siloam Road, Easley, SC, on 3/15/12;
- e. \$12,412.25 in US currency seized from 203 Siloam Road, Easley, SC, on 3/15/12;

2. **REAL PROPERTY:**

- a. 203 Siloam Road, Lot B,
Anderson County, State of South Carolina
Titled in the Name of: Bailey and Rice Family Limited Partnership
Tax Map Number 236-07-04-011-000

ALL that piece, parcel or tract of land located in 81 Plaza in Powdersville, Anderson County, South Carolina, containing 0.148 acres, and having

according to a plat prepared for Ronnie G. Wilson by Alex A. Moss, P.E. & P.L.S. No. 1194, dated August 11, 1995, recorded in the R.M.C. Office for Anderson County in Plat 110 at Page 766, the following metes and bounds, to wit:

BEGINNING at an old iron pin on the easterly side of a 50' public street, which iron pin is 37.12 feet from the intersection of the 50' public street and Siloam Church Road and running thence N. 78°13'00" E., 222.02 feet to an iron pin; thence N. 11°29'32" W., 30 feet to an iron pin; thence S. 78°13'00" W., 210.05 feet to an iron pin on the easterly side of a 50' public street; thence along said side of the public street, S. 6°53'00" W., 31.62 feet to an iron pin, the point of beginning.

This conveyance is Subject to any and all existing reservations, easements, rights of way, zoning ordinances and restrictive covenants that may appear of record or on the premises.

This is the same property conveyed to the Bailey & Rice Family Limited Partnership by deed dated December 28th, 1995, and recorded in the R.M.C. Office for Anderson County on January 4, 1996, in Deed Book 2256 at Page 95.

- b. 10 Blythewood Drive, Greenville, SC 29607
Greenville County, South Carolina
Tax Map No. 0281 00 02 107 00
Titled in the Name of: Jena G. Eison

ALL that lot of land, with the buildings and improvements thereon, situate on the northeast side of Blythewood Drive, in the City of Greenville, Greenville County, South Carolina, being shown as Lot 24 on plat of University Circle, made by Piedmont Engineering Service, May, 1948, recorded in the RMC Office for Greenville County, in Plat Book Y at Page 111, and as shown on a more recent plat of survey prepared for Janice A. Joss by Freeland & Associates, Inc., dated January 13, 1998, recorded in the RMC Office for Greenville County, S.C., in Plat Book 37-8 at Page 9 on January 16, 1998, with reference to said plat for a more complete description by metes and bounds.

DERIVATION: THIS being the same property conveyed by Deed of Distribution of Janice A. Joss, Deceased, Estate Case No. 04 ES2301237, dated August 2, 2003, recorded in the ROD Office for Greenville County, S.C., in Deed Book 2158 at Page 814 on August 3, 2005.

- c. 203 Siloam Road, Lot C,
Anderson County, State of South Carolina
Tax Map Number 236-07-04-008
Titled in the Name of: Bailey and Rice Family Limited Partnership

ALL that certain piece, parcel or lot of land with any improvements thereon or thereafter constructed thereon, situate, lying and being in the State of South Carolina, County of Anderson and being shown and designated as Lot C on survey prepared by Robert R. Spearman for Norman S. Garrison and R. Heyward Ballard, dated December 6, 1984 and recorded in the Register of Deeds Office for Anderson County in Plat Book 92 at Page 562 on December 12, 1984. Reference to the above described survey is hereby made for a more complete and accurate metes and bounds description thereof.

This being a portion of the same property conveyed to WWB Limited Partnership by virtue of a deed from W.W. Bridwell, dated October 5, 1999 and recorded in the Register of Deeds Office for Anderson County in Deed Book 3527 at Page 163 on October 7, 1999.

- d. 230 Sam Davis Road
Woodruff, SC
Spartanburg County, South Carolina
TMS# 4-27-00-041.00
Titled in the Name of: Allison and Charles Schaum

All that certain, piece, parcel or lot of land with any improvements thereon, situate, lying and being in the State of South Carolina, County of Spartanburg and being shown and designated as 2.00 acres on survey prepared by Ralph Smith, PLS entitled "Survey for Charles and Allison Schaum, being a portion of the property shown on my plat for Ronald G. Wilson" dated November 8, 1999 and recorded in the Register of Deeds Office for Spartanburg County in Plat Book 154 at Page 324 on June 18, 2003. Reference to the above described survey is hereby made for a more complete and accurate metes and bounds description thereof.

ALSO, given is the right of ingress, egress and regress in, over and to the certain 50 foot right-of-way as set forth and delineated on aforesaid plat. It is further understood that Cassie Kendall, her heirs and assigns forever, gave unto Allison J. Schaum the right of ingress, egress, and regress in, over and to the certain 50 foot right-of-way as set forth and delineated on aforesaid plat by deed recorded in Deed Book 78-G at page 998 on July 17, 2003.

This being the same property conveyed to Allison J. Schaum by virtue of a deed from Cassie Kendall, dated June 19, 2003 and recorded in the Register of Deeds Office for Spartanburg County in Deed Book 78-G at Page 998 on July 17, 2003.

This conveyance is made subject to all restrictions, easements, rights of way, setback lines, roadways, and zoning ordinances, if any, of record on the recorded plat(s), or on the premises affecting said property.

- e. 253 Sam Davis Road
Woodruff, South Carolina
Spartanburg County, South Carolina
Parcel # 4-34-00-016.00
Titled in the Name of: Cassie Kendall

All that certain piece, parcel or tract of land lying, situate in the County of Spartanburg, State of South Carolina, being shown and designated as containing 59.74 acres, more or less, on a plat prepared for Ronald G. Wilson by Ralph Smith, P.L.S., dated November 8, 1999, to be recorded herewith in the RMC Office for Spartanburg County. For a more complete and particular description, reference is hereby made to the above referred to plat and record thereof.

This is a portion of the same property conveyed to Corinne Renshaw and Cassie Kendall by Deed of Diane H. King, dated November 4, 1999, and recorded November 10, 1999, in Deed Book 70-Y, page 682 said RMC Office for Spartanburg County, South Carolina.

This property conveyed subject to all rights-of-ways of record

- f. 375 Sam Davis Road
Woodruff, SC 29388
Spartanburg County, South Carolina
TMS # (portion of) 4-34-00-016.01
Titled in the Name of: Michael & Jennifer Pressley

All that certain piece, parcel or tract of land with any improvements thereon or thereafter constructed thereon, situate, lying and being in the State of South Carolina, County of Spartanburg and being shown and designated as TOTAL AREA = 6.58 ACRES on survey prepared by Ralph Smith P.L.S. for Michael S. & Jennifer L. Pressley, dated December 23, 2007 and recorded in the Register of Deeds Office for Spartanburg County in Plat Book 162 at Page 592 on January 3, 2008. Reference to the above described survey is

hereby made for a more complete and accurate metes and bounds description thereof.

This being a portion of the same property conveyed to Cassie Kendall by virtue of a deed from Corinne Renshaw, dated December 22, 1999 and recorded in the Register of Deeds Office for Spartanburg County in Deed Book 71-E at Page 711 on December 28, 1999. Reference is also made to the Title to Real Estate from Dianne H. King to Cassie Kendall and Corinne Renshaw, dated November 3, 1999 and recorded in the Register of Deeds Office for Spartanburg County in Deed Book 70-Y at Page 682 on November 10, 1999.

This conveyance is made subject to all restrictions, easements, rights of way, setback lines, roadways, and zoning ordinances, if any, of record on the recorded plat(s), or on the premises affecting said property.

- g. 1300 Heritage Club Drive
Greenville, South Carolina 29615
Greenville County, South Carolina
TMS # 0540 42 01 034 00
Titled in the Name of: Herman E. Cox, Trustee of the Smallwood Family Trust

All that certain piece, parcel or lot of land situate, lying and being in the County of Greenville, State of South Carolina being shown and designated as Unit No. 34, Heritage Club Villas on a plat thereof, prepared by Wooten Surveying Co., dated October 10, 2001 and recorded in Plat Book 44-O at Page 84 in the ROD Office for Greenville, South Carolina. Reference is hereby made to said plat of record for a more complete and accurate description as to the metes and bounds, courses and distances as appear thereon.

This being the same property conveyed unto Marie W. Seymour by deed of Aurie C. Thomas, as Trustee of the Richard R. Thomas and Aurie C. Thomas Living Trust dated December 1, 1993, and Aurie C. Thomas, individually dated November 8, 2004, and recorded November 10, 2004 in Deed Book 2116, page 1401, in the ROD Office for Greenville County, South Carolina.

- h. 2420 S J Workman Hwy
Woodruff, South Carolina
Spartanburg County, South Carolina
Parcel No. 4-27-00-040.08
Titled in the Name of: Cassie Wilson

All that certain piece, parcel or lot of land, situate, lying and being in the State of South Carolina, County of Spartanburg, being shown and designated as Lot No. 9, containing 22.27 acres, more or less, as shown on survey entitled "Hugh Harrison Farms", prepared by Ralph Smith, PLS, dated October 8, 2004 and recorded in Plat Book 156, page 944, ROD office for Spartanburg County, South Carolina. For a more complete and particular description, reference is hereby made to the above referred to plat and record thereof.

The above described property is conveyed subject to the restrictive Covenants as recorded in Deed Book 81-P, page 513, ROD Office for Spartanburg County, South Carolina.

This being the same property conveyed to Walson Development, LLC by deed of Dianne H. King, dated October 21, 2004, recorded in Deed Book 81-R, Page 127, ROD Office for Spartanburg County, South Carolina

- i. 1308 Circle Road
Easley, South Carolina 29642
Anderson County, South Carolina
TMS#: portion of 213-00-06-006(to be combined with Tract B - 213-00-06-025)
Titled in the Name of: Cassie Wilson

All that certain piece, parcel or lot of land with any improvements thereon or thereafter constructed thereon, situate, lying and being in the State of South Carolina, County of Anderson and being shown and designated as 2.50 Acres (Including all R/W and Easements) on survey prepared by John F. Tinsley for Cassie Wilson, dated December 4, 2007 and recorded in the Register of Deeds Office for Anderson County in Plat Book 1779 at Page 8-A on May 28, 2008. Reference to the above described survey is hereby made for a more complete and accurate metes and bounds description thereof.

This being a portion of the same property conveyed to Joe E. Cely, as Personal Representative of the Estate of Irene Carolyn Cely a/k/a Irene M. Cely, a 53.072% interest; Joe E. Cely, a 23.464% interest, Marvin S. Cely, III, a 11.732% interest; and Celia C. Hamilton, a 11.732% interest by virtue of a deed from The Brushy Creek, FLP, dated February 25, 2008 and recorded in the Register of Deeds Office for Anderson County in Deed Book 8536 at Page 53 on March 5, 2008. Reference is also made to the Certificate of Dissolution of Limited Partnership "The Brushy Creek, FLP" as recorded in the Register of Deeds Office for Anderson County in Deed Book 8536 at Page 59 on March 5, 2008.

This conveyance is made subject to all restrictions, easements, rights of way, setback lines, roadways, and zoning ordinances, if any, of record on the recorded plat(s), or on the premises affecting said property.

- j. 114 Barfield Drive
Easley, South Carolina 29642
Anderson County, South Carolina
TMS# 213-09-01-009
Titled in the Name of: Henry & Crowder LLC

All that certain piece, parcel or lot of land lying and being in the State of South Carolina, County of Anderson, being shown and designated as Lot No. 9, Hawthorne Ridge, as shown on plat prepared by Freeland and Associates, Inc., dated October 19, 2000 and recorded in Plat Book 1174, at Page 8 in the R/D Office for Anderson County, South Carolina, reference to said plat being hereby made for a more complete metes and bounds description thereof.

This being property conveyed to The Peoples National Bank by deed from Landco Builders, Inc. dated 3/14/08 and recorded 3/17/08 in Deed Book 8558, at Page 102 in the Register of Deeds Office for Anderson County, South Carolina.

The above described property is subject to any and all easements and/or rights of way for roads, utilities, drainage, etc. as may appear of record and/or on the premises and to any and all restrictions, covenants or zoning ordinances affecting such property as may appear of record. The above described property is specifically subject to restrictions governing said property as appear in the Register of Deeds Office for Anderson County, South Carolina in Book 3934, page 273.

- k. 881 Old Plantation Road
Fountain Inn, South Carolina, 29644
Laurens County, South Carolina
Titled in the Name of: Wallace Lindsey Howell, Director of Kingdom Estate Trust
TMS# 213-00-00-006

All that piece, parcel, or lot of land, situate, lying and being in Laurens County, State of South Carolina, being known and designated as on the Enoree River containing 117 acres, more or less being formerly bounded by lands of LW. Gray, Carrie Coker, C.B. Redd, Jane Miller, and Enoree River, and now bounded on the North by the Enoree River, the center of which is Spartanburg County, on the East by lands now or formerly of Dorothy Lee

Clayton and Rhonda Clayton, on the South by lands now or formerly of Clyde Redd, on the West by lands now or formerly of David G. Coker, and on the Northwest by lands now or formerly of Crescent Land and Timber Company.

Also, a right-of-way or easements of ingress and egress 20 feet in width beginning at the southwestern most corner of the tract conveyed herewith and extending across other property of grantors in a direct line to an existing gravel road which leads to a public roadway this easement also includes the right of use the existing dirt roadway above mentioned which leads to a public roadway

Less and except portions conveyed in Deed Book 210 Page 551, Book 214-Page 236, Book 214 Page 370 and in Book 211 Page 829.

This being a portion the same property conveyed to grantors by Deed of James Redd, recorded 08-16-71 in Book 197, Page 239 in the RMC Office for Laurens County. See also Deed Book 516 Page 84 and Book 635 Page 291 for half interests to and from said grantors.

3. VEHICLES:

- a. 1997 Land Rover
VIN: SALDV3242VA124074
Tag: BWM-192
Registered to: Bailey Rice Family LTD Partnership
- b. 2011 Ford F350
VIN: 1FT8W3DTXBEA09513
Tag: 10965FM
Registered to: Henry & Crowder Family Limited Partnership
- c. 2008 Ford F250
VIN: 1FTSW21R78ED13903
Registered to: Charles Edward Schaum, Jr.
- d. 1994 MITS FH100 Refrigerated Box Truck
VIN: JW6CEE1GXRL000333
Registered to: Live Oak Farm, LLC
- e. 2006 Exis ES 18 Sport Trailer (flat bed)
VIN: 4LAAH182665038199
Registered to: Live Oak Farm, LLC

- f. 2010 Honda Element
VIN: 5J6YH1H31AL002463
Registered to: Jena Eison

4. PERSONAL PROPERTY:

- a. Miscellaneous coins, bars, and monies seized from 900 East North Street, Greenville, SC, on 3/16/12;
- b. Miscellaneous coins, bars, and monies seized from 1308 Circle Road, Easley, SC, on 3/19/12;
- c. Miscellaneous coins, bars and monies seized from 205 Siloam Road, Easley, SC, on 3/15/12;
- d. Miscellaneous coins and monies seized from 203 Siloam Road, Easley, SC on 3/15/12;
- e. six items of artwork/sculpture seized from 203 Siloam Road, Easley, SC, on 3/15/12;
- f. two items of artwork/sculpture seized from 1308 Circle Road, Easley, SC, on 3/16/12;
- g. 1 item of artwork/sculpture seized from 203 Siloam Road, Easley, SC, on 3/19/12;
- h. four items of artwork/sculpture seized from 205 Siloam Road, Easley, SC, on 3/15/12;

5. BANKING/INVESTMENT:

- a. Allied Energy Escrow/Compass Bank/Cornerstone Bank/Edmonton State Bank (oil well)
Beneficiary Acct: xxxx0418
- b. Southern First Bank (DBA Greenville First Bank)
100 Verdae Boulevard, Ste 100, Greenville, SC 29607
Account Name: Atlantic Bullion & Coin
Account number: xx451
Amount: \$213,008.17

6. FIREARMS/AMMUNITION:

- a. Weapon, Cal.36, long handle, serial # 20151
- b. Weapon, Col Sam Colt New York, serial # 171759
- c. Weapon, Ruger SP101, serial # 571-81915
- d. Weapon, Sears 30-30 Winchester Rifle, serial # 12234

- e. Weapon, Winchester 190 .22 LR, serial # B1524762
- f. Rifle, SKS 7.62 x 39 semi automatic, serial # 03891
- g. Rifle, SKS 7.62 x 39, semi automatic, serial # 02182
- h. Revolver, Ruger Super Blackhawk .44 MAG, serial # 85-01584
- i. Revolver, Smith & Wesson Mod 36 .38 SPCL, serial# 408002
- j. Shotgun, JC Higgins Mod 20, 12G, serial # 5832001
- k. Shotgun, Remington 870 12 G, serial # 1269455V
- l. Rifle, FN .30 .06 Cal half action, serial # 10331
- m. Shotgun, Winchester Mod 1897, serial # 390620
- n. Rifle, Winchester Remington Mod 7400, serial # 8535944
- o. Rifle, Marlin 39A .22LR, serial # 17270310
- p. Rifle, Marlin 336 .44 mag, serial # AC48452
- q. Rifle, SKS 7.62 x 39, serial # 10255863A
- r. Remington 1100 12GA, serial # M543775V
- s. Remington 870 12GA, serial # A746329M
- t. Remington 1100 12GA, serial # N863063M
- u. Winchester 1300 12 GA, serial # L2689923
- v. Browning, Light 12, 12GA, serial # G62081
- w. Rifle, Marlin 30AW .30 .30 Win, serial # 02076451
- x. Rifle, Marlin 336 .30 Win, serial # 24156649
- y. Rifle, Remington 742, .308 Win, serial # 7178036
- z. Winchester, Med 70, .300 Win Mag, serial # G320285
- aa. Rifle, Marlin 336 .30 .30 Win, serial # 22005921
- bb. Lever Action Henry, .44-40 Cal, serial # 20500
- cc. Pistol, Remington 1911.45 ACP, serial # 4134642
- dd. Revolver, Ruger Single .22LR, serial # 65-58910
- ee. Pistol, Ruger Mark II .22 LR, serial #19-94646
- ff. Revolver, S&W .38 Cal, serial #39321
- gg. Revolver, Ruger Single .22LR, serial # 67-76528
- hh. Rifle, Ruger 10/22 .22LR, serial # 247-09843
- ii. Norinco 90 7.62 x 39, serial # 9323450
- jj. New Haven 600 A 12GA, serial # H462853
- kk. Remington 870 12 GA, serial # T669796X
- ll. Rifle, SKS 7.62 x 39, serial # 16653
- mm. Rifle, SKS 7.62 x 39, serial # 002562
- nn. Rifle, KBI SA-85M 7.62 x 39, serial # SM17889
- oo. Rifle, SKS 7.62 x 39, serial # 003891
- pp. Savage 94 410, serial # P842290
- qq. Garcha 410, serial # 415741
- rr. Mossberg 500A 12 GA. Serial # K688377
- ss. Pistol, Colt 1911 .38 Super, serial # FR25137E
- tt. Revolver, Colt Frontier Seat .22LR, serial # 23311F
- uu. Revolver S&W .38, serial # 245911

- vv. Revolver, Dan Wesson .357 mag, serial # 38404
- ww. 12 GA IMP by Stoeger, serial # 412903
- xx. Pistol, Python 357 Magnum, serial # T81106
- yy. M-16, serial # 000647
- zz. Single bolt action, Italian carbine, serial # RT37
- aaa. Winchester 33, serial# 2086000
- bbb. Ruger 223, serial # 185-77181
- ccc. Sig Sauer 229, serial # AB22408

C. SUBSTITUTE ASSETS:

1. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendants –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the said Defendant up to the value of the above described forfeitable property;

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

8/ *William N. Nettles* at the direction of ad
 WILLIAM N. NETTLES (wjw)
 UNITED STATES ATTORNEY