

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT
2012-CP-40-01914

ALAN WILSON,)
in his official capacity as the)
SECURITIES COMMISSIONER FOR)
THE STATE OF SOUTH CAROLINA,)

Plaintiff,)

-vs-)

RONNIE GENE WILSON;)
ATLANTIC BULLION & COIN, INC.,)
AND SOUTHERN FIRST)
BANCSHARES,)
INC.,)

Defendants.)

AMENDED COMPLAINT

RICHLAND COUNTY
FILED
2012 MAR 22 AM 9:43
JEANETTE W. MARRIAGE
CLERK, S.C.S.

The Plaintiff, Alan Wilson, in his official capacity as Securities Commissioner for the State of South Carolina (the “Securities Commissioner”), complaining that Defendants Ronnie Gene Wilson and Atlantic Bullion & Coin, Inc. (collectively the “Defendants”) have engaged in acts, practices, and transactions which violate the South Carolina Uniform Securities Act of 2005, S.C. Code Ann. § 35-1-101 et seq. (Supp. 2011) (the “State Securities Act”), alleges the following:

PARTIES

1. Atlantic Bullion & Coin, Inc. (“AB&C”) is a South Carolina corporation based in Easley, South Carolina. The company was incorporated on April 23, 1985¹, was administratively dissolved December 31, 2007, and then was reinstated July 1, 2011.
2. AB&C’s registered agent is “R G Wilson” (a/k/a Ronnie Gene Wilson).
3. Ronnie Gene Wilson (“Wilson”) is President of AB&C.

¹ The company originally was incorporated as “Republic Bullion & Coin, Inc.” The company name was changed to “Atlantic Bullion & Coin, Inc.” effective May 6, 1985.

4. Both Wilson and AB&C have a last known business address of 203 Siloam Road, Easley, South Carolina 29642.

5. Southern First Bancshares, Inc. (“Southern First”) is a South Carolina corporation based in Greenville, South Carolina. Southern First has a last known corporate business address of 100 Verdae Boulevard, Suite 100, Greenville, South Carolina. In the Greenville, South Carolina market, Southern First does business as “Greenville First.”

6. Plaintiff is the Securities Commissioner of the State of South Carolina and, as such, is administrator of the State Securities Act.

JURISDICTION

7. Defendants are persons who are doing business in South Carolina by offering and selling securities in this State as defined in the State Securities Act, S.C. Code Ann. §§35-1-102(29) and 35-1-610(c) (Supp. 2011).

8. This Court has jurisdiction over the parties and the subject matter of this action.

9. This action is properly brought in the Richland County Court of Common Pleas.

10. This civil action is brought pursuant to S.C. Code Ann. §35-1-603(a), which authorizes the Securities Commissioner to bring an action in the Richland County Court of Common Pleas to enjoin violations of and enforce compliance with the State Securities Act.

VENUE

11. Venue is proper in the Richland County Court of Common Pleas, Fifth Judicial Circuit.

ALLEGATIONS

12. The Defendants have been and are offering persons (“Investors”) the opportunity to invest in silver and earn a return with no active participation or decision making required by the Investor.

13. In connection with the opportunity, Investor money was pooled primarily in one account.

14. In connection with the opportunity, Investor fortunes are interwoven with and dependent upon the efforts and success of the Defendants.

15. The opportunities being offered constitute “securities” under South Carolina law.

16. Offers and sales of the securities are being made “in this State” by means of offers from this State to residents in this State.

17. Offers and sales have also been made in this State by means of offers from this State to residents of other States.²

18. The securities being offered are required to be registered prior to their offer and sale in or from this State.

19. The securities being offered were not registered with the State Securities Division or other appropriate regulatory agencies before they were offered and sold in this State or from this State.

20. The persons offering the securities are required to be registered as broker-dealers and agents prior to their offering and selling the securities in this State or from this State.

21. The persons offering the securities were not registered as broker-dealers or agents with the State Securities Division or other appropriate regulatory agencies prior to the offer and/or sale of the securities in this State or from this State.

22. Monies raised through the offer and sale of the securities in and from the State of South Carolina are, as of February 29, 2012, being deposited and/or transferred into the following bank accounts:

² Pursuant to the State Securities Act, offers to sell securities are made “in this State” whether or not either party is then physically present in this State, if the offer (i) originates from within this State (“in this State”); or (2) is directed by the offerer to a place in this State and received at the place to which it is directed (“from this State”). See S.C. Code Ann. § 35-1-610 (c).

Institution

Account Number

Southern First (d/b/a Greenville First)

1-645-1

23. The Defendants previously were ordered by the State Securities Division to cease and desist issuing, offering and selling securities in South Carolina.

24. In a Consent Order designed to resolve the "Order to Cease and Desist" referred to in item 23, Wilson and AB&C were ordered again to "Cease and Desist from issuing, offering and selling any securities, including investment contracts, issued by Respondents, or any successor thereof, or any entity directly or indirectly controlled or hereafter organized by or on behalf of such persons or their agents to persons in South Carolina."

25. Defendants each executed the Consent Order. Defendants' signatures on the Consent Order evidenced their consent and their agreement to be bound by the terms of the Consent Order.

26. Defendants are operating in the State of South Carolina in violation of the Order to Cease and Desist and the Consent Order.

27. Investors are not being told of the Order to Cease and Desist issued against Wilson and AB&C or of Wilson and AB&C's consent to cease and desist from issuing, offering and selling securities in South Carolina prior to their decision to invest with Defendants.

28. Defendants have, on one or more occasions, used proceeds from a later investor to fund repayment of a portion or all of an earlier investor's investment and/or payment of returns and have not notified the later investor of this material fact.

29. Defendants have, on one or more occasions, failed to indicate to an investor that the price (per ounce) at which Defendants allegedly effected the investor's purchase or sale of his or her silver investment was a price (per ounce) which was outside the trading range of silver

during the period in which the investor gave funds for investment in silver and/or received funds purportedly from the sale of his or her silver investment.

30. Defendants have, on one or more occasions, created and provided to an investor an account statement indicating the investor owned silver when no silver was in fact purchased for the investor's account.

31. In connection with the offer, sale, or purchase of the security above, Defendants employed one or more devices, schemes, or artifices to defraud investors.

32. On one or more occasions, Defendants created and provided account statements which contained false or fraudulent information concerning the price and number of shares allegedly purchased and/or sold for an investor and the investor's return on investment ("ROI").

a. AB&C account statement as of February 25, 2011 (the "February 25, 2011 statement") (Exhibit 1) shows the following silver purchases at the following prices on the dates listed for customer number 10466:

<u>Date</u>	<u>Ounces Purchased</u>	<u>Price per Ounce</u>	<u>Purchase Amount</u>
11/17/2010	800	\$24.00	\$19,200.00
12/2/2010	900	\$25.00	\$22,500.00
12/2/2010	600	\$25.00	\$15,000.00

b. The February 25, 2011 statement indicates that the silver purchased above (totaling 2,300 ounces) was sold on January 19, 2011 for \$29.81 per ounce, resulting in proceeds of \$68,563.00.

c. The February 25, 2011 statement also reflects a new purchase of 2,600 ounces of silver on January 28, 2011 at a price of \$26.47 per ounce, resulting in a cost of \$68,822.00.

d. On or around March 23, 2011 client number 10466 indicated his intent to liquidate his investments with Defendants.

e. On or around March 28, 2011 the shares allegedly purchased for the customer

number 10466 on January 28, 2011 allegedly were sold.

f. Following the sale, Defendants provided to customer number 10466 an account statement allegedly as of April 7, 2011 (the "April 7, 2011 statement") (Exhibit 2). The April 7, 2011 statement shows an increase in the price per ounce charged the client for his first three silver purchases of \$2.70 per ounce, \$5.24 per ounce, and \$5.24 per ounce, respectively.

g. The April 7, 2011 statement further indicated fewer ounces of silver were purchased for customer number 10466 in 2010, leaving the client with fewer ounces to reinvest when Defendants allegedly traded his account in and out between January 19 and January 28, 2011, and then with fewer ounces to liquidate when the investor requested that his account be liquidated.

h. Defendants changed the prices reflected on the account statements after the investor requested his account be liquidated.

i. No silver was purchased for customer number 10466; the fraudulent account statements were utilized as part of the Defendants' scheme or artifice to defraud.

j. AB&C account statement as of March 1, 2011 (the "March 1, 2011 statement") (Exhibit 3) shows a purchase of 4900 ounces of silver at \$25.00 per ounce was made on December 20, 2010 for customer number 10520.

k. The same account statement indicates the 4,900 ounce investment was sold on January 19, 2011 for \$29.81 per ounce, resulting in proceeds of \$146,069.00.

l. The March 1, 2011 statement also reflects a new purchase of 5,500 ounces of silver on January 28, 2011 at a price of \$26.47 per ounce, resulting in a cost of \$145,585.00.

m. On or around March 23, 2011 customer number 10520 indicated his intent to liquidate his investments with Defendants.

n. On or around March 28, 2011 the shares allegedly purchased for customer

number 10520 on January 28, 2011 allegedly were sold.

o. Following the sale, Defendants provided to customer number 10520 an account statement allegedly as of April 7, 2011 (the "April 7, 2011 statement (second account)") (Exhibit 4). The April 7, 2011 statement (second account) shows the price per ounce charged the client for his initial silver purchase of 4,900 ounces as \$30.71, an increase of \$5.71 per ounce over what the March 1, 2011 statement showed.

p. The April 7, 2011 statement (second account) further indicated fewer ounces of silver were purchased for customer number 10520 in 2010, leaving the client with fewer ounces to reinvest when Defendants allegedly traded his account in and out between January 19 and January 28, 2011, and then with fewer ounces to liquidate when the investor requested that his account be liquidated.

q. Defendants changed the prices reflected on the account statements after the client requested his account be liquidated.

r. No silver was purchased for customer number 10520; the fraudulent account statements were utilized as part of the Defendants' scheme or artifice to defraud.

s. AB&C account statement as of March 9, 2011 (Exhibit 5) shows a purchase of 2,600 ounces of silver at \$34.00 per ounce was made on March 9, 2011 for account 11150.

t. On or around March 23, 2011 customer number 11150 indicated his intent to liquidate his investments with Defendants.

u. On or around March 28, 2011 the shares allegedly purchased on March 9, 2011 allegedly were sold.

v. Following the sale, Defendants provided to customer number 11150 an account

statement allegedly as of April 11, 2011 (the "April 11, 2011 statement") (Exhibit 6). The April 11, 2011 statement showed the price per ounce charged the client for his initial silver purchase as \$37.67, an increase of \$3.67 per ounce over what the March 9, 2011 statement showed.

w. The April 11, 2011 statement further indicated fewer ounces of silver were purchased for the client than shown on the March 9, 2011 statement, leaving the client with fewer ounces to liquidate when the investor requested that his account be liquidated.

x. Defendants changed the price reflected on the March 9, 2011 statement after the client requested his account be liquidated.

y. No silver was purchased for customer number 11150; the fraudulent account statements were utilized as part of the Defendants' scheme or artifice to defraud.

33. On or around February 1, 2012, Wilson met with representatives of the Securities Division. At that meeting, Wilson testified under oath that:

a. His and AB&C's silver business was "buying bars" in 100 or 1,000 ounce quantities exclusively;

b. He and AB&C actually took possession of the silver bars; and

c. He and AB&C did not store anything; they would ship silver purchased to the client or the client could pick it up, but that "everything goes out to the client."

34. No evidence has been received in the case which tends to support Wilson's statements that he and AB&C actually took possession of any significant quantity of silver bars or that silver purchased for clients (excluding approximately four Sterling Trust clients) was shipped to the clients or held for pickup, and the evidence which has been received thus far disputes the statements.

35. On or around February 1, 2012, Wilson met with representatives of the Securities Division. At that meeting, Wilson testified under oath that:

- a. He and AB&C sell silver to banks in New York and Zurich, among other places;
- b. He gets on the phone to find out the price when someone wants to invest and quotes the investor an accurate price at the time of investment;
- c. His business on a yearly basis is probably a million or two in new money and "may be less than a million;"
- d. He and AB&C "may go two months and get very few calls" (to invest); and
- e. AB&C has an account at the Delaware Depository with "probably close" to 500,000 or 600,000 ounces of silver in it.

36. No evidence has been received in the case which tends to support Wilson's statements above and the evidence which has been received thus far disputes the statements.

37. During the period on or about January 1, 2011 to on or about February 29, 2012, approximately thirty-three million dollars (\$33,000,000.00) was given to Defendants for "silver" and/or "silver investments."

38. During the period on or about January 1, 2009 to on or about February 29, 2012, approximately seventy-one million dollars (\$71,000,000.00) was placed with Defendants, the majority of which was for investments in silver.

39. On or around March 1, 2012, Defendants represented to Division Staff that their silver purchases occurred through "FideliTrade" and that client silver was stored at "the Delaware Depository."

40. During the period January 1, 2009 to February 28, 2012, Defendants purchased a total of approximately eighty-five (85) 1000 ounce silver bullion bars through FideliTrade.

41. Following their purchase, the silver bars were allotted as follows: sixty-four (64) were purchased for the IRA accounts of four (4) Sterling Trust clients and were transferred out

by FidelityTrade to Sterling Trust, and the remaining twenty-one (21) were sold by Defendants on or around June 8, 2011 (9 bars) and on or around December 23, 2011 (12 bars).

42. The Defendants received approximately six hundred ninety-three thousand, one hundred fourteen dollars and thirteen cents (\$693,114.13) from the sale of the twenty-one (21) bars.

43. None of the limited amount of silver purchased by Defendants was purchased for client account 10466, 10520, or 11150.

44. Corporate records of the firm Defendants allege holds silver for AB&C and/or its clients, Delaware Depository Service Company, LLC (“the Delaware Depository”), also were checked.

45. No account, contract, or stored silver was located for AB&C and/or Wilson, at the Delaware Depository.

46. In connection with the offer and sale of the securities above, the Defendants paid commissions to one or more unregistered agents for referrals.

CAUSES OF ACTION

A. VIOLATION OF S.C. CODE § 35-1-301

(Registration Requirements in Connection with the Offer or Sale of Securities)

47. Wilson and AB&C offered for sale and sold securities in this State and from this State which were not federal covered securities and were not registered under the State Securities Act, and for which no claim of exemption was made.

48. This conduct violated Section 35-1-301 of the State Securities Act.

B. VIOLATION OF S.C. CODE §§ 35-1-401 AND 35-1-402

(Broker-Dealer and Agent Registration in Connection with the Offer or Sale of Securities)

49. Wilson and AB&C transacted securities business in and from the State of South Carolina, when Wilson and AB&C were not registered as broker-dealers and/or as agents under the State Securities Act and when no claim of exemption from registration as a broker-dealer or as an agent was made.

50. This conduct violated Sections 35-1-401 and 35-1-402 of the State Securities Act.

C. VIOLATION OF S.C. CODE § 35-1-402(d)

(Use of an Unregistered Agent in Connection with the Offer or Sale of Securities)

51. Wilson and AB&C associated with and paid commissions to one or more persons who acted as agents for Wilson and AB&C but who were not registered under the State Securities Act and who have made no claim of exemption from registration as an agent.

52. This conduct violated Section 35-1-402(d) of the State Securities Act.

D. VIOLATION OF S.C. CODE § 35-1-501

(Fraud in Connection with the Offer or Sale of Securities)

53. In connection with the offer or sale of securities in or from South Carolina, Wilson and AB&C directly or indirectly (i) employed a device, scheme, or artifice to defraud; (ii) made untrue statements of material facts or omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and (iii) engaged in acts, practices, or a course of business which operated as a fraud or deceit upon investors. Wilson's and AB&C's conduct includes, but is not limited to, the following:

a. Wilson and AB&C failed to disclose to one or more investors that Wilson and AB&C were offering and selling securities in violation of an Order to Cease and Desist and a Consent Order issued by the State Securities Division and Securities Commissioner and agreed to by Wilson and AB&C;

b. Wilson and AB&C failed to disclose to one or more investors that the funds the investors placed with Wilson and AB&C were not invested in the manner Defendants represented the funds would be invested;

c. Wilson and AB&C misstated to one or more investors and/or omitted to state to one or more investors that the price (per ounce) for the investor's purchase or sale of his or her silver investment was an amount which was outside the trading range of silver during the period during which the investor gave funds for investment in or received funds purportedly from the sale of silver; and

d. Wilson and AB&C, on one or more occasions created and provided to an investor an account statement or statements containing false or fraudulent information.

54. This conduct violated Section 35-1-501 of the State Securities Act.

E. VIOLATION OF S.C. CODE § 35-1-505

(Making of False or Misleading Statements in Proceedings under the Act)

55. In connection with a record that was created as part of an investigation pursuant to Section 35-1-602 of the Act, Wilson made one or more statements that, at the time and in light of the circumstances under which they were made, were false or misleading in a material respect, or, in connection with the statements, omitted to state one or more material facts necessary to make the statements made, in the light of the circumstances under which they were made, not false or misleading. Wilson's conduct includes, but is not limited to, the following:

a. Testifying under oath that his and AB&C's silver business was "buying bars" in 100 or 1,000 ounce quantities exclusively, when this statement is not true;

b. Testifying under oath that he and AB&C actually took possession of the silver bars they bought, when this statement is not true and/or, without more, is materially misleading due to omissions of one or more material facts;

c. Testifying under oath that all silver ordered for investors was shipped to or picked up by the investors, when this statement is not true;

d. Testifying under oath that he “gets on the phone to find out the price” when someone wants to invest and quotes the investor an accurate price at the time of investment, when this statement is not true and/or, without more, is materially misleading due to omissions of one or more material facts;

e. Testifying under oath that his business on a yearly basis is probably one million or two million in new money and “may be less than a million,” when this statement is not true;

f. Testifying under oath that he and AB&C “may go two months and get very few calls (to invest),” when this statement is either not true or, without more, is materially misleading concerning the number of investments made with Wilson and AB&C on a monthly basis over the thirty-six month period preceding this Complaint; and

g. Testifying under oath that AB&C has an account at the Delaware Depository with “probably close” to 500,000 or 600,000 ounces of silver in it, when this statement is not true.

56. This conduct violated Section 35-1-505 of the State Securities Act.

PRAYER FOR RELIEF

WHEREFORE, the Securities Commissioner for the State of South Carolina prays that the Court issue an Order granting the following relief:

- A. Ordering Ronnie Gene Wilson and Atlantic Bullion and Coin, Inc. to permanently cease and desist from violating the State Securities Act;
- B. Appointing a receiver or conservator for the assets of Atlantic Bullion and Coin, Inc.;
- C. Ordering an accounting of the assets and liabilities of Atlantic Bullion and Coin,

Inc.;

- D. Ordering disgorgement by Defendants of ill-gotten gains obtained in connection with the offers and sales to investors of the securities detailed in the Complaint;
- E. Imposing civil penalties on each Defendant in the amount of ten thousand (\$10,000.00) dollars per violation for each violation of the State Securities Act; and
- F. Providing for such other and further relief as may be just and proper, including but not limited to enjoining Defendants from liquidating, moving or otherwise disposing of any and all assets of the affected investors, wherever such assets may be situate, and/or permanent injunctive relief as may be directed by the court.

Respectfully submitted,

ALAN WILSON
Securities Commissioner
TRACY A. MEYERS
Senior Assistant Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-4731

BY: Tracy Meyers
ATTORNEYS FOR
THE STATE OF SOUTH CAROLINA

March 22, 2012

Atlantic Bullion & Coin, Inc. Statement

Customer #: 10466

Summary

Total Payments	\$56,700.00
- Total Purchases	\$125,522.00
+ Total Sales	\$68,563.00
- Total Withdrawals	\$0.00
= Cash Balance	(\$259.00)
Current Holdings (oz)	2,600
Market Price (per oz)*	32.93
Mkt Value of Holdings*	\$85,618.00
Mkt Value of Account*	\$85,359.00
Profit (Loss)*	\$28,659.00
Average APY:	143.48%

Cash Transactions

Date	Payments	Withdrawals	Note	Chk#
11/17/2010	\$19,200.00			
12/2/2010	\$15,000.00			
12/2/2010	\$22,500.00			
Totals	\$56,700.00	\$0.00		

*As of 2/25/2011

Buy/Sell Transactions

1/1/2000

2/25/2011

Date	Product	Buy	Sell	Price	Purchase Amt	Sale Amt	ROI	Note
11/17/2010	Silver (Oz)	800		\$24.00	\$19,200.00			
12/2/2010	Silver (Oz)	900		\$25.00	\$22,500.00			
12/2/2010	Silver (Oz)	600		\$25.00	\$15,000.00			
1/19/2011	Silver (Oz)		2300	\$29.81		\$68,563.00	20.9%	
1/28/2011	Silver (Oz)	2600		\$26.47	\$68,822.00			

Claude Tudor

Atlantic Bullion & Coin, Inc. Statement



Customer #: 10466

Summary

Total Payments	\$56,700.00
- Total Purchases	\$113,212.00
+ Total Sales	\$135,839.00
- Total Withdrawals	\$0.00
= Cash Balance	\$79,327.00
Current Holdings (oz)	0
Market Price (per oz)	36.00
Mkt Value of Holdings*	\$0.00
Mkt Value of Account*	\$79,327.00
Profit (Loss)**	\$22,627.00
Average APY:	122.72%

Cash Transactions

Date	Payments	Withdrawals	Note	Ck #:
11/17/2010	\$19,200.00			
12/2/2010	\$25,000.00			
12/2/2010	\$22,500.00			
	\$56,700.00	\$0.00		

*As of 4/7/2011

Buy/Sell Transactions

		1/1/2000			4/7/2011			
Date	Product	Buy	Sell	Price	Purchase Amt	Sale Amt	ROI	Note
11/17/2010	Silver (Oz)	700		\$26.70	\$18,690.00			
12/2/2010	Silver (Oz)	700		\$30.24	\$21,168.00			
12/2/2010	Silver (Oz)	500		\$30.24	\$15,120.00			
1/19/2011	Silver (Oz)		1900	\$29.81		\$56,639.00	3.0%	
1/28/2011	Silver (Oz)	2200		\$26.47	\$58,234.00			
3/28/2011	Silver (Oz)		2200	\$36.00		\$79,200.00	36.0%	

Claude Tudor

Atlantic Bullion & Coin, Inc. Statement



Customer #: 10520

Summary

Total Payments	\$122,453.09
- Total Purchases	\$268,085.00
+ Total Sales	\$146,069.00
- Total Withdrawals	\$0.00
= Cash Balance	\$437.09
Current Holdings (oz)	5,500
Market Price (per oz)*	34.44
Mkt Value of Holdings*	\$189,420.00
Mkt Value of Account*	\$189,857.09
Profit (Loss)*	\$67,404.00
Average APY:	226.54%

Cash Transactions

Date	Payments	Withdrawals	Note	Check
12/20/2010	\$122,453.09			
Totals	\$122,453.09	\$0.00		

*As of 3/1/2011

Buy/Sell Transactions

Date	Product	Buy	Sell	Price	1/1/2000		3/1/2011		RO	Note
					Purchase Amt	Sale Amt				
12/20/2010	Silver (Oz)	4900		\$25.00	\$122,500.00					
1/19/2011	Silver (Oz)		4900	\$29.81		\$146,069.00		19.2%		
1/28/2011	Silver (Oz)	5500		\$26.47	\$145,585.00					

Revocable Trust of Claude Tudor

203 Siloam Road, Easley, SC 29642 | 864-605-1000 | 864-605-1005 (fax) | www.atlanticbullionandcoin.com

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Atlantic Bullion & Coin, Inc. Statement



Customer #: 10520

Summary	
Total Payments	\$122,453.09
- Total Purchases	\$241,955.00
+ Total Sales	\$281,240.00
- Total Withdrawals	\$0.00
= Cash Balance	\$161,738.09
Current Holdings (oz)	0
Market Price (per oz) ^a	36.00
Mkt Value of Holdings*	\$0.00
Mkt Value of Account*	\$161,738.09
Profit (Loss)*	\$39,285.00
Average APY:	90.3%

Cash Transactions				
Date	Payments	Withdrawals	Note	Ck #
12/20/2010	\$122,453.09			
Total	\$122,453.09	\$0.00		

^aAs of 4/7/2011

Buy/Sell Transactions				1/1/2000	4/7/2011			
Date	Product	Buy	Sell	Price	Purchase Amt	Sale Amt	ROI	Note
12/20/2010	Silver (Oz)	4000		\$30.71	\$122,840.00			
1/19/2011	Silver (Oz)		4000	\$29.81		\$119,240.00	-2.9%	
1/28/2011	Silver (Oz)	4500		\$26.47	\$119,115.00			
3/28/2011	Silver (Oz)		4500	\$36.00		\$162,000.00	36.0%	

Revocable Trust of Claude Tudor

Atlantic Bullion & Coin, Inc. Statement



Customer #: 11150

Summary

Total Payments	\$89,562.85
- Total Purchases	\$88,400.00
+ Total Sales	\$0.00
- Total Withdrawals	\$0.00
= Cash Balance	\$1,162.85
Current Holdings (oz)	2,600
Market Price (per oz)*	36.20
Mkt Value of Holdings*	\$94,120.00
Mkt Value of Account*	\$95,282.85
Profit (Loss)*	\$5,720.00
Average APY:	0%

Cash Transactions

Date	Payments	Withdrawals	Note	Chk #
3/9/2011	\$89,562.85			
Totals	\$89,562.85	\$0.00		

*As of 3/9/2011

Buy/Sell Transactions

1/1/2000

3/9/2011

Date	Product	Buy	Sell	Price	Purchase Amt	Sale Amt	RO	Note
3/9/2011	Silver (Oz)	2600		\$34.00	\$88,400.00			

Revocable Trust of Heien L. Tudor

Atlantic Bullion & Coin, Inc. Statement



Customer #: 11150

Summary

Total Payments	\$89,562.85
- Total Purchases	\$86,641.00
+ Total Sales	\$82,800.00
- Total Withdrawals	\$0.00
= Cash Balance	\$85,721.85
Current Holdings (oz)	0
Market Price (per oz)*	36.00
Mkt Value of Holdings*	\$0.00
Mkt Value of Account*	\$85,721.85
Profit (Loss)*	(\$3,841.00)
Average APY:	-80.91%

Cash Transactions

Date	Payments	Withdrawals	Note	Ck #
3/9/2011	\$89,562.85			
Total	\$89,562.85	\$0.00		

*As of 4/11/2011

Buy/Sell Transactions

				1/1/2000	4/11/2011			
Date	Product	Buy	Sell	Price	Purchase Amt	Sale Amt	ROI	Note
3/9/2011	Silver (Oz)	2300		\$37.67	\$86,641.00			
3/28/2011	Silver (Oz)		2300	\$36.00		\$82,800.00	-4.4%	

Revocable Trust of Helen L. Tudor