

COPY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

FILED
CHARLOTTE, N. C.

SEP 9 2002

IN RE: ALL FUNDS ON DEPOSIT IN)
ACCOUNT NUMBER 000669829075 in)
THE BANK OF MM ACMC BANQUE DE)
COMMERCE, INC., AT NATIONSBANK,)
N.A., CONSISTING OF \$18,756,420.97,)
MORE OR LESS.)

U. S. DISTRICT COURT
W. DIST. OF N. C.

C.A. NO. 3:98mc96-McK

GEORGE AND DOLORES ROLLAR,)
Plaintiffs,)

C.A. NO. 3:01CV205-McK

v.)

UNITED STATES OF AMERICA, et al.,)
Defendants.)

(CASES CONSOLIDATED)

RICHARD VASQUEZ,)
Intervener.)

UNOPPOSED MOTION TO MAKE SUPPLEMENTAL DISTRIBUTION

TO THE HONORABLE H. BRENT MCKNIGHT, UNITED STATES DISTRICT JUDGE:

1. On September 22, 2002 the Receiver filed a Motion to Establish Distribution Procedures [Docket No. 76]. On October 11, 2002 the Court issued an Order granting the motion [Docket No. 79] pursuant to which the Receiver was given authority to distribute funds to each investor holding an allowed claim in an amount equal to 57.58% of the claim. Since that time the Receiver has filed nine (9) motions to allow claims and upon issuance of orders, has distributed the funds accordingly.

2. On October 7, 2002 the Receiver filed a Motion to Establish Tax Liability Reserve [Docket No. 77]. On October 11, 2002 the Court issued an Order Establishing Tax Reserve [Docket No. 80] pursuant to which the Receiver segregated \$1.7 million for a potential tax liability.

3. On July 28, 2003 the Receiver filed a Request for Private Letter Ruling with the IRS in an attempt to resolve the potential tax liability. On May 6, 2004 the IRS finally issued a Private Letter Ruling holding that the Receiver would not have a tax liability. On June 29, 2004 the Receiver filed a Notice of the ruling with the Court [Docket No. 132].

4. As a result of the filing of the Private Letter Ruling, the Receiver now has at least \$1.7 million of additional funds to distribute.

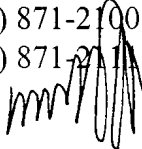
5. In order to simplify the distribution percentage and logistics, the Receiver requests that the overall distribution percentage be raised to 64% from 57.58%. Attached hereto as Exhibit "A" and incorporated by reference is a schedule which shows the amount each investor with an allowed claim will receive as a result of the additional distribution.

WHEREFORE, PREMISES CONSIDERED, the Receiver requests authority to make the requested disbursements and for such other and further relief, general or special, at law or in equity, to which he may show himself justly entitled.

Respectfully submitted,

QUILLING SELANDER CUMMISKEY & LOWNDS, P.C.
2001 Bryan Street, Suite 1800
Dallas, Texas 75201-4240
(214) 871-2100 (Telephone)
(214) 871-2111 (Facsimile)

By:



Michael J. Quilling
Texas State Bar No. 16432300

ATTORNEYS FOR RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of September, 2004 a true and correct copy of the foregoing document was sent via first class mail, postage prepaid, on the following:

William A. Brafford
Assistant United States Attorney
United States Attorney's Office for
the Western District of North Carolina
227 West Trade Street, Suite 1700
Charlotte, North Carolina 28202

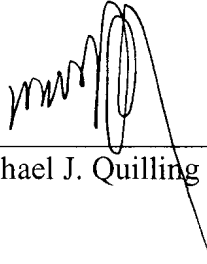
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Megan Watkins
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214 North Tryon Street, Suite 2500
Charlotte, NC 28202-2381

This Motion will also be posted on the Receiver's website, www.secreceiver.com, immediately after filing.



A handwritten signature in black ink, appearing to read "Michael J. Quilling", is written over a horizontal line. The signature is stylized with a large, looped 'Q' and a long, sweeping tail that extends downwards and to the right.

Michael J. Quilling

Exhibit “A”

Investor	Net Claim	Interim Dist Amt
Karen Marie Charles	\$ 10,000.00	\$ 641.02
Lawrence Warfield, Receiver	\$ 100,000.00	\$ 6,410.18
Gary & Freda Michaelson	\$ 20,000.00	\$ 1,282.04
Robert Dadds	\$ 3,000.00	\$ 192.31
Richard Fox (Zion)	\$ 82,000.00	\$ 5,256.35
Robert Dadds	\$ 17,000.00	\$ 1,089.73
International Investment Group	\$ 1,500,000.00	\$ 96,152.70
George & Delores Rollar	\$ 1,400,000.00	\$ 89,742.54
Sittambalam Rajasundaram	\$ 150,000.00	\$ 9,615.27
Kumarasundaram Sittambalam	\$ 10,000.00	\$ 641.02
Kamalanathan Sangarasivam	\$ 100,000.00	\$ 6,410.18
James King	\$ 50,000.00	\$ 3,205.09
Barry Sharpe	\$ 25,000.00	\$ 1,602.54
Patricia Jeckel	\$ 25,000.00	\$ 1,602.54
Rev. James M Johnson	\$ 10,000.00	\$ 641.02
Rev. Rece Tucker	\$ 10,000.00	\$ 641.02
Holy People for Christ Church	\$ 10,000.00	\$ 641.02
Varice Smallwood	\$ 10,000.00	\$ 641.02
Betty Armwood	\$ 10,000.00	\$ 641.02
Mary Givens	\$ 5,000.00	\$ 320.51
Carolyn Churchwell	\$ 29,000.00	\$ 1,858.95
Mary Fuhrman	\$ 55,000.00	\$ 3,525.60
Mahesh Yagnik	\$ 25,000.00	\$ 1,602.54
Thomas Ryan	\$ 20,000.00	\$ 1,282.04
Tim Maroney & Debra Novak	\$ 400,000.00	\$ 25,640.72
Tim Maroney & Debra Novak	\$ 300,000.00	\$ 19,230.54
Harold Moll	\$ 50,000.00	\$ 3,205.09
PMI Holdings, Inc - T. Whiteley	\$ 600,000.00	\$ 38,461.08
John Organ	\$ 10,000.00	\$ 641.02
MJQ, Receiver for Fred Gilliland	\$ 950,000.00	\$ 60,896.71
Gary & Freda Michaelson	\$ 100,000.00	\$ 6,410.18
George & Delores Rollar	\$ 300,000.00	\$ 19,230.54
George & Delores Rollar	\$ 300,000.00	\$ 19,230.54
Richard Fox (Zion)	\$ 419,840.00	\$ 26,912.50
Thomas Ryan	\$ 70,000.00	\$ 4,487.13
Richard Fox (Leix)	\$ 150,000.00	\$ 9,615.27
Conrad & Joyce Niergarth	\$ 40,000.00	\$ 2,564.07
Roger D Enfield	\$ 51,500.00	\$ 3,301.24
Susan & Billy Jones	\$ 105,600.00	\$ 6,769.15
MJQ, Receiver for Fred Gilliland	\$ 1,659,685.77	\$ 106,384.15
Thomas Currey	\$ 30,000.00	\$ 1,923.05
Kay Proctor	\$ 25,000.00	\$ 1,602.54
George & Delores Rollar	\$ 10,380,000.00	\$ 665,366.68
Julie Underwood	\$ 30,000.00	\$ 1,923.05
Patrick McCalman	\$ 8,000.00	\$ 512.81
Duane McCalman	\$ 24,000.00	\$ 1,538.44
David McCalman	\$ 40,000.00	\$ 2,564.07
William Foster	\$ 8,000.00	\$ 512.81
Boris Vasilev	\$ 10,000.00	\$ 641.02
Henderson Sewing Machine Co.	\$ 320,000.00	\$ 20,512.58
James Henderson, Sr	\$ 85,000.00	\$ 5,448.65
Richard Sorenson	\$ 25,000.00	\$ 1,602.54
Gary & Suzanne Harhay	\$ 6,000.00	\$ 384.61
Curtis Edwards	\$ 20,000.00	\$ 1,282.04
Central Funding (Sorenson)	\$ 20,000.00	\$ 1,282.04

Investor	Net Claim	Interim Dist Amt
Charles Organ	\$ 10,000.00	\$ 641.02
David Helbert	\$ 58,600.00	\$ 3,756.37
Robert Benz	\$ 42,000.00	\$ 2,692.28
John Dawson	\$ 50,000.00	\$ 3,205.09
David Edlund	\$ 50,000.00	\$ 3,205.09
Mike Barzal	\$ 5,000.00	\$ 320.51
Sean Morgan	\$ 15,000.00	\$ 961.53
Lynn Bedard	\$ 20,000.00	\$ 1,282.04
Dennis Brewer	\$ 20,000.00	\$ 1,282.04
Fred Marsh	\$ 10,000.00	\$ 641.02
Eugene Pylypow	\$ 10,000.00	\$ 641.02
Angela Pylypow	\$ 9,534.42	\$ 611.17
Michael Pylypow	\$ 10,000.00	\$ 641.02
Linda & Dan Pearson	\$ 10,000.00	\$ 641.02
Thomas & Valinda Wolfram	\$ 10,000.00	\$ 641.02
Randy Rezka	\$ 5,000.00	\$ 320.51
Claus Wagner	\$ 10,000.00	\$ 641.02
Robert & Sandra Wright	\$ 10,000.00	\$ 641.02
Thomas Bradshaw	\$ 10,000.00	\$ 641.02
Lance Bradshaw	\$ 20,000.00	\$ 1,282.04
William Call	\$ 30,000.00	\$ 1,923.05
Richard Fox (Leix)	\$ 50,000.00	\$ 3,205.09
James Columbia	\$ 1,075.00	\$ 68.91
Margaret Columbia	\$ 2,581.00	\$ 165.45
International Investment Group	\$ 2,000,000.00	\$ 128,203.60
Agreed Total	\$ 22,682,416.19	\$ 1,453,969.06