

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

United States of America	)	
	)	
	Plaintiff,	)
	)	
vs.	)	Cr. No. 6:19-239
	)	
Scott A. Kohn	)	
Future Income Payments, LLC	)	
Joseph P. Hipp	)	
Kraig S. Aiken	)	
David N. Kenneally,	)	
	)	Civil Action No. 6:19-cv-01112-BHH
	Defendants.	)
	)	
_____	)	
In Re Receiver for Scott A. Kohn and	)	
Future Income Payments, LLC, Joseph P.	)	
Hipp, Kraig S. Aiken and David N.	)	
Kenneally	)	

**MOTION TO AMEND ORDER OF APPOINTMENT**

COMES NOW THE UNITED STATES OF AMERICA, pursuant to Title 18, United States Code, Section 1956(b)(4)(A) and moves the Court to Amend the Court’s July 18, 2019, Order of Appointment (“Order”) appointing Beattie B. Ashmore as the Court-appointed Receiver for Scott A. Kohn (“Kohn”), Future Income Payments, LLC (“FIP”) and a number of related persons and entities collectively defined as the FIP Receivership Entities to remove and add a number of entities for reasons the United States and the Receiver believe are in the best interest of the parties subject to the Order.

First, since the inception of the Order, the Receiver has assessed the asset value and merits of continuing with certain ongoing concerns currently under the Order. As a result, an Agreement has been entered into by the Receiver, Chris Pozek and Sutton Leasing, Inc.

related to the following connected entities: Car Champs Finance, LLC, Veterans Rideshare, LLC, Your Leasing Solutions f/k/a VRS Leasing, Inc. (*See* Agreement attached hereto as Exhibit A.) The Receiver believes that the Agreement is in the best interest of the victims in this case and that continued control of these entities would be an unwarranted use of time and money. The United States therefore believes that removal of these entities from the Order is appropriate. As such, the United States of America respectfully requests the Court grant its Motion to Amend the Order of Appointment to remove Car Champs Finance, LLC; Veterans Rideshare, LLC; and Your Leasing Solutions f/k/a VRS Leasing, Inc.

Additionally, through forensic accounting related to the Receivership Entities, additional alter egos have been discovered. As such, the Government respectfully requests the Court grants its Motion to Amend the Order of Appointment to add the following additional entities as Receivership Entities: Future Income Payments, Inc., Cash Flow Outsourcing Services, Inc., Buy Sell Annuity, Inc., AAA Auto Lease to Own Holdings, LLC, and Legal Cash Flow Solutions.

In so moving, the United States of America incorporates by reference that which was contained in the original Motion for Appointment of a Federal Receiver (Motion in Criminal Case, ECF No 12.)

Respectfully submitted,  
LANCE CRICK  
UNITED STATES ATTORNEY

BY: s/William J. Watkins, Jr.  
WILLIAM J. WATKINS, JR.  
Assistant U.S. Attorney  
FEDERAL I.D. No: 7863

February 28, 2020