

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

United States of America	)	
	)	
	Plaintiff,	)
	)	Cr. No. 6:19-239
vs.	)	
	)	
Scott A. Kohn	)	
Future Income Payments, LLC	)	
Joseph P. Hipp	)	
Melanie Jo Schulze-Miller,	)	
	)	
	Defendants.	)
	)	
_____	)	
In Re Receiver for Scott A. Kohn and	)	
Future Income Payments, LLC, Joseph P.	)	
Hipp, Kraig S. Aiken and David N.	)	Civil Action No. 6:19-cv-01112-BHH
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 March 3, 2020 Order of Appointment (“Order”) appointing Beattie B. Ashmore as the Court-appointed Receiver for Scott A. Kohn, Future Income Payments, LLC (“FIP”), Joseph P. Hipp, Kraig S. Aiken, and David N. Kenneally and a number of related persons and entities collectively defined as the “FIP Receivership Entities” to add Melanie Jo Schulze-Miller (“Schulze-Miller”) who was named in a Second Superseding Indictment on August 11, 2020 (Criminal Matter, ECF 219) and related entities Softwind Three Trust and Softwind Three Limited Partnership.

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.) As such, the United States of America respectfully requests the Court grant its Motion to Amend the Order of Appointment to add Schulze-Miller, Softwind Three Trust and Softwind Three Limited Partnership.

The Government has consulted with counsel for Schulze-Miller and she does not consent to the requested amendment.

Respectfully submitted,  
PETER M. MCCOY, JR.  
UNITED STATES ATTORNEY

BY: s/William J. Watkins, Jr.  
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August 27, 2020