

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- against-

05-CV-4724 (LLS)

AIMSI TECHNOLOGIES, INC., REGINALD
HALL, HAROLD DEMPSEY "BUTCH"
BALLOW, EVERETT BASSIE, WINFRED
FIELDS, AND BRUCE CHARLES POLLOCK,

Defendants,

- and-

WILLIAM WATKINS, DOLORES WATKINS,
WRIGHT FAMILY HOLDINGS, INC., WRIGHT
FAMILY TRUST, GBY INTERNATIONAL
PUBLIC RELATIONS, INC., BP
INTERNATIONAL, INC., SECURE RELEASES,
INC., CHINA GLOBAL DISTRIBUTION CORP.,
LINES OVERSEAS MANAGEMENT,
WONDERLAND CAPITAL CORP., PRIVATE
FUNDING CORP., and OREKOYA CAPITAL
CORP.,

Relief Defendants.

PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
NOTICE OF MOTION AND MOTION FOR AN
ORDER APPROVING PLAN OF DISTRIBUTION

Notice

PLEASE TAKE NOTICE that, based upon the accompanying Memorandum of Law in Support of this Motion and the proposed plan of distribution attached as an exhibit thereto, plaintiff, United States Securities and Exchange Commission (the "Commission or SEC") will move this court, the Hon. Louis L. Stanton, at a date and time and place as may be determined by

the Court, for an order approving a Plan of Distribution by which injured investors may be compensated for their losses.

Motion

Plaintiff, United States Securities and Exchange Commission (the “Commission”), moves the Court for an order approving a Plan of Distribution (“Distribution Plan”). A proposed order granting this motion, and appending the Distribution Plan, is included as Exhibit 1. A Memorandum of Law in support of this Motion is contemporaneously filed herewith.

WHEREFORE, the Commission respectfully requests that this court enter an order approving a Distribution Plan for the Fair Fund, and such other relief that the court deems just and proper.

Dated: February 7, 2017

Respectfully submitted,

/s/ Susan S. Pecaro

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Nichola L. Timmons

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