

Peggy Hunt (Utah State Bar No. 6060)
Michael F. Thomson (Utah State Bar No. 9707)
Nathan S. Seim (Utah State Bar No. 12654)

DORSEY & WHITNEY LLP

136 South Main Street, Suite 1000

Salt Lake City, UT 84101-1685

Telephone: (801) 933-7360

Facsimile: (801) 933-7373

Email: hunt.peggy@dorsey.com

thomson.michael@dorsey.com

seim.nathan@dorsey.com

Attorneys for Court-Appointed Receiver Peggy Hunt

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff.

V.

TRAFFIC MONSOON, LLC, a Utah Limited
Liability Company, and CHARLES DAVID
SCOVILLE, an individual,

Defendants.

**RECEIVER'S NOTICE OF
ABANDONMENT OF PERSONAL
PROPERTY (VEHICLE)**

2:16-cv-00832-JNP

The Honorable Jill N. Parrish

Peggy Hunt, the Court-appointed Receiver in the above-referenced case (the "Receiver"),
by and through counsel, hereby submits this *Notice of Abandonment of Personal Property*
(*Vehicle*) (the "Notice").

I. BACKGROUND

1. On July 26, 2016, the Securities and Exchange Commission commenced the
above-captioned action against Defendants Traffic Monsoon, LLC ("Traffic Monsoon") and

Charles David Scoville (“Scoville”), and the Court entered a *Temporary Restraining Order and Order Freezing Assets*, which was amended on July 27, 2016.¹

2. On July 27, 2016 the Court appointed the Receiver pursuant to an *Order Appointing Receiver*², which was subsequently amended on March 28, 2017³ (collectively, the “Receivership Order”).

3. The Court appointed the Receiver “for the purpose of marshaling and preserving all assets of Traffic Monsoon, LLC and all assets of Charles D. Scoville that were obtained directly or indirectly from Traffic Monsoon (Receivership Assets).”⁴

4. Traffic Monsoon is a limited liability company that was organized in the State of Utah in 2014.

II. PERSONAL PROPERTY TO BE ABANDONED

5. In marshaling the Receivership Assets, the Receiver has identified the following vehicle, registered to Scoville (the “Vehicle”):

Make/Model:	Nissan Altima 2.5/S/SV/SL
Year:	2013
VIN:	1N4AL3AP8DN563790

III. REASONS FOR ABANDONMENT

6. The Receiver has determined that the Vehicle was purchased in 2013, prior to the formation of Traffic Monsoon. Therefore, it appears that the Vehicle is not a Receivership Asset that can be administered for the benefit of the Receivership Estate.

¹ Docket Nos. 8 and 14.

² Docket No. 11.

³ Docket No. 81.

⁴ *Id.* at p. 1.

7. Furthermore, based on the value of the Vehicle obtained from a Kelly Blue Book search, it appears likely that after the costs of sale and obtaining authority for sale, the Vehicle would not be of substantial value to the Receivership Estate.

IV. CONCLUSION

For the reasons set forth herein, the Receiver abandons any interest the Receivership Estate may have in the Vehicle.

DATED this 10th day of May, 2017.

DORSEY & WHITNEY LLP

/s/ Michael F. Thomson

Peggy Hunt

Michael F. Thomson

Nathan S. Seim

Attorneys for Receiver, Peggy Hunt

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of May, 2017, I caused the foregoing *Notice of Abandonment of Personal Property (Vehicle)* to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all counsel of record in this case.

/s/ John J. Wiest