

13. Upon information and belief and upon the express orders of the officers and/or directors of SIS and WPC, all of said trust funds belonging to plaintiff and in the possession of SIS have been transferred by SIS to WPC or some other person with the intent to defeat and defraud plaintiff's interest therein so that SIS is no longer in the possession and control of said trust funds and cannot deliver, or be made to deliver, the same to plaintiff.

14. Upon information and belief, the trust funds belonging to plaintiff and formerly in the possession of SIS and now in the possession or under the control of WPC and the officers and/or directors of SIS and/or WPC, are still trust funds belonging to plaintiff and plaintiff is entitled to pursue the same wherever they may be found.

15. Upon information and belief, when said trust funds were ordered to be transferred by SIS and were transferred by SIS to WPC, or some other entity under the control of said defendants, said defendants knew that said funds were trust funds belonging to plaintiff and the transfer thereof by the defendants, as aforesaid, to some other person other than the plaintiff or from SIS's depository in Greenville County, South Carolina, to a depository outside South Carolina constituted a conversion of plaintiff's property with the intention of defeating the plaintiff's interest therein and with the intention of defrauding the plaintiff of its interest therein for which the defendants are jointly and