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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

13 SECURITIES AND EXCHANGE
14 COMMISSION,

15 Plaintiff,

16 vs.

17 STEVE CHEN, *et al.*,

18 Defendants.
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Case No. CV15-07425 RGK (PLA)

**DECLARATION OF PETER F.
DEL GRECO IN SUPPORT OF
PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION'S
MOTION FOR SUMMARY
JUDGMENT AGAINST STEVE
CHEN**

1 I, Peter F. Del Greco, declare pursuant to 28 U.S.C. § 1746, as follows:

2 1. I am an attorney admitted to practice law by the State Bar of California and
3 by this Court. I am a Staff Attorney in the Enforcement Division of Plaintiff Securities
4 and Exchange Commission's ("SEC") Los Angeles Regional Office. I have personal
5 knowledge of each of the matters set forth below and, if called as a witness, I could and
6 would competently testify to the facts stated herein.

7 2. I have personal knowledge of the matters set forth herein, except as
8 otherwise noted, and, if called as a witness, I could and would competently testify under
9 oath to the facts stated herein. I make this declaration in support of the SEC's
10 accompanying Motion for Summary Judgment.

11 3. Attached hereto as **Exhibit 1** are true and correct copies of documents
12 showing Steve Chen's control of USFIA, Inc. and its bank accounts, including articles of
13 incorporation, account opening documents and signature cards, produced by various
14 banks at which USFIA opened accounts.

15 4. Attached hereto as **Exhibit 2** are true and correct copies of documents
16 showing Steve Chen's control of Amkey, Inc. and its bank accounts, including articles of
17 incorporation, account opening documents and signature cards, produced by various
18 banks at which Amkey opened accounts.

19 5. Attached hereto as **Exhibit 3** are true and correct copies of documents
20 showing Steve Chen's control of Quail Ranch Golf Club, LLC and its bank accounts,
21 including articles of incorporation, account opening documents and signature cards,
22 produced by a bank at which Quail Ranch opened accounts.

23 6. Attached hereto as **Exhibit 4** are true and correct copies of documents
24 showing Steve Chen's control of US-China Consultation Association and its bank
25 accounts, including articles of incorporation, account opening documents and signature
26 cards, produced by a bank at which US-China Consultation Association opened accounts

27 7. Attached hereto as **Exhibit 5** is a true and correct copy of a document issued
28 by Alliance Financial Group and USFIA.

1 8. Attached hereto as **Exhibit 6** are true and correct copies of excerpts from a
2 certified copy of the transcript of Dong-Jun Liu’s August 26, 2016 deposition testimony
3 in this matter.

4 9. Attached hereto as **Exhibit 7** are true and correct copies of excerpts from a
5 certified copy of the transcript of Li Li’s August 30, 2016 deposition testimony in this
6 matter.

7 10. Attached hereto as **Exhibit 8** are true and correct copies of excerpts from a
8 certified copy of the transcript of George Mo’s September 19, 2016 deposition testimony
9 in this matter.

10 11. Attached hereto as **Exhibit 9** are true and correct copies of excerpts from a
11 certified copy of the transcript of Michael Liu’s October 5, 2016 deposition testimony in
12 this matter.

13 12. Attached hereto as **Exhibit 10** are true and correct copies of excerpts from a
14 certified copy of the transcript of Jun “Jason” Ning’s October 3, 2016 deposition
15 testimony in this matter.

16 13. Attached hereto as **Exhibit 11** are true and correct copies of excerpts from a
17 certified copy of the transcript of Chenyu Chen’s October 11, 2016 deposition testimony
18 in this matter.

19 14. Attached hereto as **Exhibit 12** are true and correct copies of excerpts from a
20 certified copy of the transcript of Charlene Szu Kimura’s October 20, 2016 deposition
21 testimony in this matter.

22 15. Attached hereto as **Exhibit 13** is a true and correct copy of a document titled
23 “USFIA Membership Application” which was previously marked as Exhibit 233 at the
24 deposition of George Mo, which was translated into English from the original Mandarin
25 document shown to the deponent, and which is followed by the certification of the
26 translator.

27 16. Attached hereto as **Exhibit 14** is a true and correct copy of a document titled
28 “USFIA Membership Application” which was previously marked as Exhibit 255 at the

1 deposition of Yinhua “Michael” Liu, which was translated into English from the original
2 Mandarin document shown to the deponent, and which is followed by the certification of
3 the translator.

4 17. Attached hereto as **Exhibit 15** is a true and correct copy of a translation of
5 the audio portion of a Gemcoin video, which is followed by the certification of the
6 translator. Attached hereto as **Exhibit 15(a)** is a true and correct copy of a screenshot
7 taken of the same Gemcoin video as it appeared on Youtube.

8 18. Attached hereto as **Exhibit 16** is a true and correct copy of a document titled
9 “Attestation of Larry Mills”, a Records and Information Management Specialist with the
10 Securities and Exchange Commission, indicating that his diligent search of the
11 Commission’s records and files did not disclose its receipt of any registration statements
12 under the name USFIA, Inc.

13 19. Attached hereto as **Exhibit 17** is a true and correct copy of a document titled
14 “Certificate of Nonexistence of Record”, certified by James Inaldo, Records Manager,
15 Immigrant Investor Program Office, Citizenship and Immigration Services, of the U.S.
16 Department of Homeland Security (“DHS”), indicating that his diligent search of the
17 DHS’s database systems did not disclose any EB-5 records associated with any of the 12
18 specifically enumerated and identified entities associated with Steve Chen.

19 20. Attached hereto as **Exhibit 18** are true and correct copies of (a) a document
20 titled “Attestation of Larry Mills”, a Records and Information Management Specialist
21 with the Securities and Exchange Commission, and (b) a prospectus dated June 16, 2000
22 received by the Commission under the name of China Unicom Limited.

23 21. Attached hereto as **Exhibit 19** is a true and correct copy of a document titled
24 “Defendant Steve Chen’s Initial Disclosures.”

25 22. Attached hereto as **Exhibit 20** is a true and correct copy of a certified copy
26 of the transcript of Steve Chen’s September 16, 2016 deposition testimony in this matter.

27 23. Attached hereto as **Exhibit 202** is a true and correct copy of a document
28 titled “Gemstone-grade amber series”, which was previously marked as Exhibit 225,

1 which was translated into English from the original Mandarin document shown to the
2 deponent, and which is followed by the certification of the translator.

3 24. Attached hereto as **Exhibit 204** is a true and correct copy of a document
4 titled “Quail Ranch Golf Club – Executive Summary and Project Description for EB-5
5 Investors”, which was marked as an exhibit at the deposition of Andy Liu.

6 25. Attached hereto as **Exhibit 207** is a true and correct copy of a document
7 titled “Bonus System – Banquet of Outstanding Model Wealth”, which was marked as an
8 exhibit at the deposition of Andy Liu, which was translated into English from the original
9 Mandarin document shown to the deponent, and which is followed by the certification of
10 the translator.

11 26. Attached hereto as **Exhibit 216** is a true and correct copy of a document
12 titled “Alliance Financial Group USFIA Currency Fund”, which was marked as an
13 exhibit at the deposition of Li Li.

14 27. Attached hereto as **Exhibit 219** is a true and correct copy of a document
15 titled “Gemcoin Bonus System”, which was marked as an exhibit at the deposition of Li
16 Li.

17 28. Attached hereto as **Exhibit 220** is a true and correct copy of a document
18 titled “Physical Inventory Observation Report”, which was marked as an exhibit at the
19 deposition of Li Li.

20 29. Attached hereto as **Exhibit 221** is a true and correct copy of a document
21 titled “Singapore Investors Field Trip (Mar 2015)”, which was marked as an exhibit at
22 the deposition of Li Li.

23 30. Attached hereto as **Exhibit 222** is a true and correct copy of a document
24 titled “Gem Coin and the Trend – USFIA, Inc.”, which was marked as an exhibit at the
25 deposition of Li Li.

26 31. Attached hereto as **Exhibit 224** is a true and correct copy of a document
27 titled “US-China Consultation Association” which was marked as an exhibit at the
28 deposition of Andy Liu, which was translated into English from the original Mandarin

