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10 Attorneys for Receiver  
Thomas A. Seaman

11  
12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**  
14 **WESTERN DIVISION**

15 SECURITIES AND EXCHANGE  
COMMISSION,

16 Plaintiff,

17 v.

18 STEVE CHEN, USFIA, INC.,  
19 ALLIANCE FINANCIAL  
GROUP, INC., AMAUCTION, INC.,  
20 ABORELL MGMT I, LLC, ABORELL  
21 ADVISORS I, LLC, ABORELL  
REIT II, LLC, AHOME REAL  
22 ESTATE, LLC, ALLIANCE  
NGN, INC., APOLLO REIT I, INC.,  
23 APOLLO REIT II, LLC, AMKEY, INC.,  
24 US CHINA CONSULTATION  
ASSOCIATION, and QUAIL RANCH  
25 GOLF COURSE, LLC,

26 Defendants.

Case No. 2:15-cv-07425 RGK PLA

**SECOND INTERIM APPLICATION  
OF SQUIRE PATTON BOGGS US  
LLP, LOCAL COUNSEL IN THE  
DOMINICAN REPUBLIC TO THE  
RECEIVER, FOR PAYMENT OF  
FEES AND REIMBURSEMENT OF  
EXPENSES**

Date: April 10, 2017  
Time: 9:00 a.m.  
Ctrm.: 850  
Judge: Hon. R. Gary Klausner

1 Squire Patton Boggs, US LLP ("SPB"), counsel to Thomas A. Seaman  
2 ("Receiver") in the Dominican Republic, the Court-appointed permanent receiver for  
3 Defendants USFIA, Inc., Alliance Financial Group, Inc., Amauction, Inc., Aborell  
4 Mgmt I, LLC, Aborell Advisors I, LLC, Aborell REIT II, LLC, Ahome Real  
5 Estate, LLC, Alliance NGN, Inc., Apollo REIT I, Inc., Apollo REIT II, LLC,  
6 Amkey, Inc., US China Consultation Association, Quail Ranch Golf Course, LLC,  
7 and their subsidiaries and affiliates (collectively, "Receivership Entities"), hereby  
8 submits this second interim application for approval and payment of fees and  
9 reimbursement of expenses ("Application"). This Application covers the period from  
10 November 1, 2016, through January 31, 2017 ("Second Application Period") and  
11 seeks approval of \$14,209.35 in fees and \$807.69 in expenses and an order  
12 authorizing the Receiver to pay the approved fees and expenses incurred.

### 13 I. INTRODUCTION

14 The Receivership Entities, which appear to have been operating in the  
15 Dominican Republic by investing in real property with various mining activities,  
16 such as the extraction of amber, managing several bank accounts with continuous  
17 money flow and maintaining registries of the operating companies in public records.  
18 All these actions appear to be linked to the scheme at the heart of the action filed by  
19 the Securities and Exchange Commission ("Commission"). The Receiver was  
20 appointed on a permanent basis on October 6, 2015.

21 The appointment orders confer broad duties, responsibilities, and powers on  
22 the Receiver that are designed to allow him to secure, preserve, and protect the assets  
23 of the Receivership Entities, investigate and recover sums transferred to third parties,  
24 conduct a forensic accounting and analysis of the Receivership Entities' financial  
25 transactions, review and analyze investor claims, and maximize the amount  
26 ultimately available for distribution to investors. The appointment orders also  
27 authorize the Receiver to engage counsel to assist him in the performance of his  
28 duties. The Receiver, after learning that the Receivership Entities transferred

1 substantial sums to entities located in the Dominican Republic, engaged SPB's Santo  
2 Domingo Office to assist in having this Court's orders and the Receiver's  
3 appointment recognized by the Dominican Republic courts and investigating  
4 potential assets of the Receivership Entities located in the Dominican Republic.

5 This Application seeks interim approval and payment of \$14,209.35 in fees for  
6 a total of 92.44 hours worked, which were mainly distributed between approaching  
7 national public institutions (such as the Superintendent of Securities) in order to  
8 obtain documents and information and representing the Receiver in the proceedings  
9 regarding the annulment of the validated Exequatur obtained in regards to the  
10 Preliminary Order. SPB's bills are attached hereto as Exhibit A.

## 11 **II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED**

### 12 **A. Categories and Descriptions of Work**

#### 13 **1. Approach to National Public Institutions**

14 Due to the limited information found in the public registries in regards to  
15 operations being held by the Receivership Entities, SPB approached the public  
16 institutions which have the possibility of providing information regarding: (i) bank  
17 transactions and records; (ii) exportation of goods (including precious stones); and  
18 (iii) identification of real estate property.

19 While doing so, the SPB team met first with the Superintendent of Securities  
20 of the Dominican Republic. The meeting held with the Superintendent of Securities  
21 lead to a direct contact between the Securities and Exchange Commission ("SEC"),  
22 said institution, and the Bank Superintendent. In order to obtain international  
23 cooperation between the entities, a number of public documents were provided and  
24 evaluated with the Superintendent of Securities, who coordinated a global  
25 distribution of various information requests in favor and in name of the SEC and the  
26 Receiver.

27 Because of the approach, SPB is in the process of obtaining a direct response  
28 regarding the real estate property with the Tax Authorities. Also, SPB will receive

1 word regarding the potential exportation activities being held by the Receivership  
2 Entities in the Dominican Republic. In order to proceed with the asset recovery  
3 regarding the Receivership Entities, SPB proceeded to investigate and determine all  
4 established entities related to the Receivership Entities in the Dominican Republic,  
5 mainly, the Dominican Receivership Entities: Ammine, S.R.L., Amn, S.R.L. and  
6 Natural Gem, S.R.L.

7 The aforementioned information will assist the Receiver in identifying  
8 potential properties which are yet to be discovered and the current status of the same.  
9 This will allow the Receiver to protect the assets which may be in danger of asset  
10 distraction by the local representatives of Steve Chen and the Receivership Entities.  
11 Also, this will direct and estimate the value of the potential precious stones which  
12 were exported out of the country and their final destination.

13 Regarding the mining operations, SPB has met with the National Mining  
14 Authorities and the Director of Amber operations in the country. With the same,  
15 SPB had the opportunity to discuss the current status of amber mining operations and  
16 the perspective held by the Dominican government officials regarding the  
17 informality and lack of security which characterize said operation. A formal request  
18 for information was filed with said Authorities in order to obtain the exact operations  
19 and who are caring out the same.

20 Additionally, SPB met with the Minister of Environmental Affairs, where the  
21 repercussions and lack of regulation of the amber mines at Hato Mayor were  
22 discussed. SPB concluded that the Ministry of Environmental Affairs has little  
23 control over the amber mining operations, but are currently seeking assistance from  
24 the National Mining Authorities in order to regulate the same.

25 **2. Appeal for Annulment of Exequatur which Recognizes the**  
26 **Preliminary Order**

27 After receiving a notice addressing a claim file by Ammine, S.R.L. –  
28 represented by Mary Oliva Alvarez Lam – seeking to annul the exequatur order

1 granted in the Dominican Republic in favor of the decision appointing the  
2 Temporary Receiver, SPB requested the appointment of a courtroom of the Civil and  
3 Commercial Chamber of the Court of Appeals of the National District and a hearing  
4 date, which was scheduled to February 21, 2017.

5 SPB has researched all potential legal defense strategies and have discussed  
6 the same with the Receiver and the Attorneys of the Receiver. The hearing  
7 preparations are being taken care of, including the investigation of potential defense  
8 evidence.

9 For this, a Bailiff prepared a report confirming the domicile of the Dominican  
10 Receivership Entities.

11 **B. Summary of Expenses Requested for Reimbursement**

12 SPB requests the Court approve reimbursement of \$807.69 in out-of-pocket  
13 costs. The itemization of such expenses is included in the attached bills. The  
14 majority of expenses incurred relate to notarizations, request of certifications,  
15 registration, and translation of documents.

16 **III. THE FEES AND COSTS ARE REASONABLE**  
17 **AND SHOULD BE ALLOWED**

18 "As a general rule, the expenses and fees of a receivership are a charge upon  
19 the property administered." *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994).  
20 These expenses include the fees and expenses of this Receiver and his professionals,  
21 including SPB. Decisions regarding the timing and amount of an award of fees and  
22 costs to the Receiver and his Professionals are committed to the sound discretion of  
23 the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev'd in part on  
24 other grounds, 998 F.2d 922 (11th Cir. 1993)).

25 In allowing fees, a court should consider "the time, labor and skill required,  
26 but not necessarily that actually expended, in the proper performance of the duties  
27 imposed by the court upon the receiver [], the fair value of such time, labor and skill  
28 measured by conservative business standards, the degree of activity, integrity and

1 dispatch with which the work is conducted and the result obtained." *United States v.*  
2 *Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks  
3 omitted). In practical terms, receiver and professional compensation thus ultimately  
4 rests upon the result of an equitable, multi-factor balancing test involving the  
5 "economy of administration, the burden that the estate may be able to bear, the  
6 amount of time required, although not necessarily expended, and the overall value of  
7 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F. 2d 232, 237 (3d Cir.  
8 1970). Regardless of how this balancing test is formulated, no single factor is  
9 determinative and "a reasonable fee is based [upon] all circumstances surrounding  
10 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.  
11 Supp. 465, 480 (S.D. Tex. 1974).

12 As a preliminary matter, the TRO and PI Order confer on the Receiver  
13 substantial duties and powers, including to conduct such investigation and discovery  
14 as is necessary to locate and account for all receivership assets, take such action as is  
15 necessary and appropriate to assume control over and preserve receivership assets,  
16 and employ attorneys and others to investigate and, where appropriate, institute,  
17 pursue, and prosecute all claims and causes of action of whatever kind and nature.  
18 *See* TRO, Part XI; PI Order, Part XI.

19 The Receiver promptly determined that experienced, qualified local counsel in  
20 the Dominican Republic was necessary due to the fact that substantial sums had been  
21 transferred to entities located in the Dominican Republic and engaged SPB pursuant  
22 to the authority granted to him in the TRO and PI Order. SPB immediately began  
23 work and has worked diligently and efficiently to assist the Receiver in carrying out  
24 his Court-ordered duties. The firm has submitted a detailed fee application that  
25 describes the nature of the services rendered and the identity and billing rate of each  
26 individual performing each task. See Exhibit A.

27 SPB has endeavored to staff matters as efficiently as possible while remaining  
28 cognizant of the complexity of issues presented. The request for fees is based on

1 SPB's customary billing rates charged for comparable services provided in other  
2 matters.

3 The work performed by SPB was essential to carrying out the Receiver's  
4 Court-ordered duties. SPB has worked diligently to investigate the assets of the  
5 receivership estate and investigate sums transferred to third parties in the Dominican  
6 Republic. SPB's fees are fair and reasonable and should be approved and paid.

7 **IV. CONCLUSION**

8 SPB, therefore, respectfully requests the Court enter an Order:

- 9 1. Approving SPB's fees of \$14,209.35;
- 10 2. Authorizing and directing the Receiver to pay SPB the approved fees, or  
11 \$14,209.35, from the assets of the Receivership Entities;
- 12 3. Approving SPB's costs in the amount of \$807.69, and authorizing and  
13 directing the Receiver to reimburse such costs in full; and
- 14 4. For such other and further relief as the Court deems appropriate.

15  
16 Dated: March 7, 2017

SQUIRE PATTON BOGGS (US) LLP  
Squire Patton Boggs, Peña Prieto Gamundi

17  
18 By:   
19 CAROLINA SOTO  
20 Attorneys for Receiver in the  
Dominican Republic

21 Dated: March 7, 2017

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

22  
23 By:           /s/ Edward Fates            
24 EDWARD FATES  
25 Attorneys for Receiver  
26 Thomas A. Seaman  
27  
28

# **EXHIBIT A**



## SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

Thomas Seaman Company  
 Mr. Thomas A. Seaman, CFA  
 3 Park Plaza  
 Suite 550  
 Irvine, California 92614

Invoice Number: 9849770  
 NCF: A010010010200005681  
 Invoice Date: 12/06/16  
 Matter Number: 115953.00001

**Assets search related to litigation in CA**

**INVOICE SUMMARY**

Fees:	USD\$ 6,092.50
Disbursements:	USD\$ 39.12
<b>Amount Due for this Invoice:</b>	<b>USD\$ 6,131.62</b>
Previous Invoices Outstanding as of the Date of this Invoice:	USD\$ 49,203.90
<b>TOTAL (INCLUDING OUTSTANDING INVOICES):</b>	<b>USD\$ 55,335.52</b>

**PAYMENT INSTRUCTIONS**

**Remit Check Payments to:**

Squire Patton Boggs (US) LLP  
 200 South Biscayne Blvd, 47<sup>th</sup> Floor  
 Miami, FL 33131  
 Phone: 305.577.7000  
 Fax: 305.577.7001

**Remit Wire Payments to:**

Citibank  
 ABA: 266086554 (WITHIN US)  
 SWIFT Code: CITIUS33 (INTERNATIONAL)  
 Account Name: Squire Patton Boggs (US) LLP,  
 International DR Operating Acct.  
 Account #: 3200718328  
 Reference: 9849770.115953

**Direct Billing Inquiries to:**

Carolina Soto Hernandez  
 Av. Pedro Henriquez Urena No. 157  
 La Esperilla  
 Santo Domingo  
 Dominican Republic  
 Phone: +1.809.472.4900  
 Fax: +1.809.472.4999  
 email: Carolina.Soto-Hernandez@squirepb.com

**Please Include Invoice Number with all Payments**

Tax Identification Number RNC #101-79813-2

## SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

Thomas Seaman Company  
Mr. Thomas A. Seaman, CFA  
3 Park Plaza  
Suite 550  
Irvine, California 92614

Invoice Number: 9849770  
NCF: A010010010200005681  
Invoice Date: 12/06/16  
Matter Number: 115953.00001

### REMITTANCE COPY

#### Assets search related to litigation in CA

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email: Carolina.Soto-  
Hernandez@squirepb.com

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12/06/16

Thomas Seaman Company / Assets search related to litigation in CA

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Invoice Number: 9849770

NCF: A010010010200005681

**ASSETS SEARCH RELATED TO LITIGATION IN CA**

**LEGAL SERVICES**

<b>DATE</b>	<b>HOURS</b>	<b>TIMEKEEPER</b>	<b>NARRATIVE</b>
11/03/16	0.50	A. Pena-Prieto	Discuss matter with SIV; correspondence with C. Soto.
11/03/16	0.30	C. Soto Hernandez	Follow upon meeting with SIV and info from the Chamber of Commerce; meet with A. Peña.
11/04/16	0.20	E. Brache	Receive and review report from law clerk indicating that Ammine has yet to appoint the tribunal and set a hearing date regarding its appeals claim.
11/07/16	2.60	E. Brache	Receive instructions from C. Soto to follow-up with T. Seaman on recommendation to prepare notary public statement indicating that Ammine and Amn's domicile is a household, email T. Seaman to follow-up on recommendation, attention to email indicating we proceed with recommendation; telephone conference notary public, give instructions to prepare statement and issue invoice for payment, receive statement and give instructions to J. Marti to review; exchange messages with investigator to follow-up on report; per C. Soto's instructions, prepare report to client regarding meeting with investigator, extra official information issued by the Registrar of the Chamber of Commerce regarding the dissolution request for Amn and Ammine.
11/07/16	0.30	A. Pena-Prieto	Exchange correspondence with Mercantile Registrar.
11/07/16	0.80	C. Soto Hernandez	Revise updated report; call with A. Pena regarding information obtained from the Chamber of Commerce; call with official of the Superintendence of Securities.
11/11/16	2.30	J. Marti	Work on draft of bailiff act regarding D. Checo's travel to Ammine's and AMN's domicile in order to identify the operations that are being carried out; work on final draft of potential ethical actions against attorneys; send final draft of ethics report to C. Soto.
11/14/16	5.10	E. Brache	Confirm with C. Soto availability for conference call with client and prepare appointment; try to contact investigator to follow-up on report; give instructions to J. Marti to contact investigator; receive and revise notary public's statement regarding Ammine and Amn domicile with J. Marti suggestions and send final version to notary public for execution; report C. Soto failure to contact investigator and receive instructions from C. Soto to email client recommending postponement of conference call until we contact the investigator; email client recommending postponement of conference call and exchange emails with A. Schoor; participate in conference call with C. Soto and A. Schoor; receive ethical actions report by J. Marti and, per C. Soto's instructions, revise; give instructions to law clerk to follow up on tribunal and hearing date appointment by Ammine regarding its appeals claim, receive and review report.

**SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI**

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Thomas Seaman Company / Assets search related to litigation in CA

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Invoice Number: 9849770

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11/14/16	1.60	J. Marti	Work on First Interim Application Of Squire Patton Boggs US LLP'S Counsel To The Receiver For Payment Of Fees And Reimbursement Of Expenses.
11/14/16	0.60	C. Soto Hernandez	Exchange of emails; conference call with E. Brache; conference call with A. Schoor and E. Brache.
11/15/16	2.00	E. Brache	Receive and review report issued by investigator; compare names of persons mentioned in report with names of persons that we have identified as related to Steve Chen; conference call investigator to discuss contents of report; report all to C. Soto.
11/15/16	0.70	J. Marti	Review investigator's preliminary report; send comments to E. Brache.
11/16/16	1.00	E. Brache	Meet with notary public, receive and review registered statement before the civil registry, file, report to C. Soto and J. Marti, follow-up on payment to notary public; exchange electronic messages with A. Schoor and T. Fates regarding status of Fee Application and confirm with J. Marti.
11/16/16	0.50	C. Soto Hernandez	Exchange of emails on pending report and other pending tasks; conference call with E. Brache; conference call with A. Schoor and E. Brache.
11/17/16	1.00	E. Brache	Telephone conference with investigator to discuss points he needs to focus on in his reports, report to C. Soto, receive instructions to reschedule conference call and email client to reschedule conference call; exchange emails with A. Schoor and prepare appointment for conference call.
11/17/16	1.40	J. Marti	Continue working on First Interim Application Of Squire Patton Boggs US LLP'S Counsel To The Receiver For Payment Of Fees And Reimbursement Of Expenses.
11/17/16	0.20	C. Soto Hernandez	Follow upon pending tasks.
11/18/16	4.30	J. Marti	Continue working on First Interim Application Of Squire Patton Boggs US LLP'S Counsel To The Receiver For Payment Of Fees And Reimbursement Of Expenses; report to C. Soto.
11/18/16	0.20	C. Soto Hernandez	Draft and send email to investigator; exchange of emails.
11/21/16	2.50	E. Brache	Attention to email between T. Fates and C. Soto regarding Fee Application; email investigator to follow-up on any new information obtained from Tax or Customs Authorities and report to C. Soto; conference call with client and receive further instructions; prepare and send C. Soto and J. Marti list of points discussed in conference call with client and give instructions to J. Marti; receive and review notice from consulate regarding Ammine's appeals claim from T. Seaman and discuss next steps with C. Soto; give instructions to law clerk to follow up on tribunal and hearing date appointment by Ammine regarding its appeals claim, receive and

**SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI**

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Invoice Number: 9849770

NCF: A010010010200005681

review report.

11/21/16	2.10	J. Marti	Receive comments from C. Soto regarding the First Interim Application Of Squire Patton Boggs US LLP'S Counsel To The Receiver For Payment Of Fees And Reimbursement Of Expenses; proceed with modifications; report to C. Soto; exchange of emails.
11/21/16	1.00	C. Soto Hernandez	Conference call with investigator; prepare for and attend call; coordinate next steps; exchange of emails.
11/22/16	7.90	E. Brache	Meet with C. Soto and discuss instructions to conduct legal investigation regarding suspension of Exequatur due to Ammine's appeal claim; conduct legal research and report findings to C. Soto; meet with C. Soto and discuss appointing tribunal and setting hearing date to take control over case and give instructions to J. Marti; exchange messages with T. Fates and A. Schoor; per C. Soto's instructions confirm if employees that received salary payments through Ammine's Scotiabank account and Ammines employees according to Ministry of Labor certification match and report to C. Soto; exchange electronic messages with T. Seaman regarding valuation of land and our request to assign a Civil and Commercial Chamber to Ammine's appeal claim a request a hearing date.
11/22/16	0.30	C. Soto Hernandez	Follow upon pending tasks.
11/23/16	1.10	E. Brache	Meet with C. Soto and discuss Fee Application and invoices attached; meet with J. Marti and discuss all pending tasks and due dates.
11/28/16	0.80	E. Brache	Conference call with J. Marti to discuss available options to investigate value of land in Hato Mayor taking into account possible amber; receive and review report from research assistant indicating that Ammine, Amn and Natural Gem have not announced anything further regarding their dissolution in national newspapers; give instructions to law clerk to follow up on tribunal and hearing date appointment by Ammine regarding its appeals claim, receive and review report.
11/28/16	0.30	J. Marti	Review modified version of the fee application sent by T. Fates; reply with comments to C. Soto.
11/29/16	0.50	E. Brache	Conference call with notary public who issued statement regarding Amn and Ammine's domicile and follow-up on payment to be issued in his favor.
11/30/16	3.20	E. Brache	Exchange email with official translator to follow up on translation of SEC claim to be used as an exhibit in our defense against Ammine's appeals claim; email T. Seaman to follow-up on request to assign Ammine's appeal claim to a Civil and Commercial Room and set hearing date; exchange email with T. Seaman regarding formality required for valuation of land in Hato Mayor; telephone conference J. Marti to discuss and divide all pending tasks and next

**SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI**

115953.00001

12/06/16

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Invoice Number: 9849770

NCF: A010010010200005681

steps; contact new investigator and coordinate meeting; attention to email with . Marti and C. Soto regarding options to obtain value of Ammine's land (taking into account amber); contact land surveyor in Hato Mayor and coordinate meeting, give instructions to J. Marti in preparation for meeting.

11/30/16 0.20 C. Soto Hernandez Exchange of emails on pending tasks; coordinate pending assignments with E. Brache.

**TOTAL HOURS FOR THIS MATTER: 45.50**

**TOTAL SERVICES: USD\$ 6,092.50**

**TIME SUMMARY**

<b>TIMEKEEPER</b>	<b>HOURLY RATE</b>	<b>HOURS</b>	<b>TOTAL</b>
Eugenia Brache	125.00	27.90	3,487.50
Josue Marti	95.00	12.70	1,206.50
Alejandro Pena-Prieto	390.00	0.80	312.00
Carolina Soto Hernandez	265.00	4.10	1,086.50
<b>TOTAL SERVICES:</b>		<b>45.50</b>	<b>USD\$ 6,092.50</b>

**DISBURSEMENT SUMMARY**

Certifications	VENDOR: Santo Domingo - DOP Only INVOICE#: 76079_11252016 DATE: 11/25/2016 Cash Detail Santo Domingo 201611 - Tran Date 10/20/2016 - Certification of publication in newspaper -Sort line 427 - DOP 70	1.51
Delivery Services	VENDOR: Santo Domingo - DOP Only INVOICE#: 76079_11252016 DATE: 11/25/2016 Cash Detail Santo Domingo 201611 - Tran Date 10/27/2016 - Fedex - Payment Invoice No.385422 -Sort line 482 - DOP 1747.05	37.61

**SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI**

115953.00001

12/06/16

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Invoice Number: 9849770

NCF: A010010010200005681

**TOTAL DISBURSEMENTS:**

**USD\$ 39.12**

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**MATTER TOTAL**

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**TOTAL SERVICES:**

**USD\$ 6,092.50**

**TOTAL DISBURSEMENTS:**

**USD\$ 39.12**

**TOTAL AMOUNT DUE FOR THIS MATTER:**

**USD\$ 6,131.62**

## SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

Thomas Seaman Company  
Mr. Thomas A. Seaman, CFA  
3 Park Plaza  
Suite 550  
Irvine, California 92614

Invoice Number: 9860545  
NCF: A010010010200005725  
Invoice Date: 01/19/17  
Matter Number: 115953.00001

### Assets search related to litigation in CA

#### INVOICE SUMMARY

Fees:	USD\$ 5,587.25
Disbursements:	USD\$ 768.57
<b>Amount Due for this Invoice:</b>	<b>USD\$ 6,355.82</b>
Previous Invoices Outstanding as of the Date of this Invoice:	USD\$ 55,335.52
<b>TOTAL (INCLUDING OUTSTANDING INVOICES):</b>	<b>USD\$ 61,691.34</b>

#### PAYMENT INSTRUCTIONS

##### *Remit Check Payments to:*

Squire Patton Boggs (US) LLP  
200 South Biscayne Blvd, 47<sup>th</sup> Floor  
Miami, FL 33131  
Phone: 305.577.7000  
Fax: 305.577.7001

##### *Remit Wire Payments to:*

Citibank  
ABA: 266086554 (WITHIN US)  
SWIFT Code: CITIUS33 (INTERNATIONAL)  
Account Name: Squire Patton Boggs (US) LLP,  
International DR Operating Acct.  
Account #: 3200718328  
Reference: 9860545.115953

##### *Direct Billing Inquiries to:*

Carolina Soto Hernandez  
Av. Pedro Henriquez Urena No. 157  
La Esperilla  
Santo Domingo  
Dominican Republic  
Phone: +1.809.472.4900  
Fax: +1.809.472.4999  
email: Carolina.Soto-  
Hernandez@squirepb.com

**Please Include Invoice Number with all Payments**

Tax Identification Number RNC #101-79813-2



## SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

Thomas Seaman Company  
Mr. Thomas A. Seaman, CFA  
3 Park Plaza  
Suite 550  
Irvine, California 92614

Invoice Number: 9860545  
NCF: A010010010200005725  
Invoice Date: 01/19/17  
Matter Number: 115953.00001

### REMITTANCE COPY

#### Assets search related to litigation in CA

#### INVOICE SUMMARY

Fees:	USD\$ 5,587.25
Disbursements:	USD\$ 768.57
<b>Amount Due for this Invoice:</b>	<b>USD\$ 6,355.82</b>
Previous Invoices Outstanding as of the Date of this Invoice:	USD\$ 55,335.52
<b>TOTAL (INCLUDING OUTSTANDING INVOICES):</b>	<b>USD\$ 61,691.34</b>

#### PAYMENT INSTRUCTIONS

##### Remit Check Payments to:

Squire Patton Boggs (US) LLP  
200 South Biscayne Blvd, 47<sup>th</sup> Floor  
Miami, FL 33131  
Phone: 305.577.7000  
Fax: 305.577.7001

##### Remit Wire Payments to:

Citibank  
ABA: 266086554 (WITHIN US)  
SWIFT Code: CITIUS33  
(INTERNATIONAL)  
Account Name: Squire Patton Boggs (US)  
LLP,  
International DR Operating Acct.  
Account #: 3200718328  
Reference: 9860545.115953

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**Please Include Invoice Number with all Payments**

Tax Identification Number RNC #101-79813-2

**SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI**

115953.00001

01/19/17

Thomas Seaman Company / Assets search related to litigation in CA

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Invoice Number: 9860545

NCF: A010010010200005725

**ASSETS SEARCH RELATED TO LITIGATION IN CA**

**LEGAL SERVICES**

<b>DATE</b>	<b>HOURS</b>	<b>TIMEKEEPER</b>	<b>NARRATIVE</b>
12/01/16	1.60	J. Marti	Prepare act for attorneys appointment in regards to the appeal against the exequatur; prepare request for designation of hearing date; report to C. Soto.
12/02/16	3.00	E. Brache	Meet with C. Soto and discuss hire of land surveyor to value Ammine's land and confirm documents and information we may share with same; telephone conference registered land surveyor's and coordinate meeting with one; ask research assistance to investigate potential land surveyor and investigator; meet with investigator and J. Marti, execute non disclosure agreement, discuss case, instructions, deliver documents regarding the case, request quote for work and report all to C. Soto.
12/02/16	1.60	J. Marti	Meet with private investigator to discuss potential in hiring; prepare confidentiality agreement for private investigator; prepare key documents for the private investigator to carry out investigation.
12/02/16	0.40	C. Soto Hernandez	Coordinate several pending tasks with E. Brache; brief meeting with new investigator; discuss with E. Brache the results of meeting; exchange of emails.
12/05/16	0.40	E. Brache	Meet with C. Soto and J. Marti and contact land surveyor and ask if he can issue a valuation of Ammine's land with added value of amber, and discuss pending tasks.
12/05/16	1.30	J. Marti	Travel to and from the Civil and Commercial Chamber of the Court of Appeal's of the National District; file request for appointment of chamber regarding the appeal claim filed against the Exequatur of the Preliminary Injunction; report to C. Soto.
12/05/16	0.80	C. Soto Hernandez	Exchange of electronic communications with sub director of the Superintendence of Securities; exchange of emails on same; coordinate on pending tasks; coordinate meeting with ministry of environment to discuss issues on amber at Hato Mayor.
12/06/16	1.10	E. Brache	Attention to email between C. Soto and official of Securities Superintendence regarding meeting; conference call land appraisal and ask if he can issue a valuation of Ammine's property with added value of amber; receive and revise update report prepared by C. Soto and report suggestions.
12/07/16	1.00	E. Brache	Exchange emails with J. Marti regarding the tribunal assigned to Ammine's claim and hearing date; attention to email from T. Seaman and A. Schoor regarding valuation of land with added value of amber; meet with J. Marti and discuss instructions regarding valuation of land.

**SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI**

115953.00001

01/19/17

Thomas Seaman Company / Assets search related to litigation in CA

Page 2

Invoice Number: 9860545

NCF: A010010010200005725

12/07/16	2.60	C. Soto Hernandez	Prepare for and attend meeting with Ministry of Environment; discuss meeting's results with E. Brache and instruct on next steps in accordance to the same.
12/08/16	0.80	E. Brache	Receive quote from potential investigator and conference call with investigator to discuss quote; follow up with J. Marti on status of pending tasks assigned to him, exchange emails with C. Soto regarding meeting with Minister of Environment.
12/09/16	1.30	E. Brache	Follow-up on investigation with J. Marti, discuss preliminary report and give instructions on points to include in final written report; discuss with C. Soto meeting held with Securities Ministry and receive instructions to prepare email to official with informations required for them to cooperate, prepare email and report to C. Soto.
12/09/16	4.10	J. Marti	Travel to and from the National Mining Authorities; meet with the Sub-director of the National Mining Authorities Eugenio Lugo; discuss situation regarding the properties in favor of Ammine; discuss potential experts who may help with the appraisal of the land; discuss the current situation in Hato Mayor and the amber operations; prepare report in regards to the meeting held with Eugenio Lugo; send to E. Brache.
12/09/16	1.50	A. Pena-Prieto	Travel to CNV and meet with legal counsel and C. Soto.
12/09/16	2.10	C. Soto Hernandez	Prepare for and attend meeting with legal director of the Superintendence of Securities; meet with E. Brache to discuss the meeting's results and instruct on next steps.
12/12/16	1.00	E. Brache	Follow up with J. Marti on hearing date to be set by tribunal assigned to Ammine's claim; exchange email with A. Pena regarding geologist contact that can help with the valuation of Ammine's property with added value of amber; meet with C. Soto to discuss request to value Ammine's property with added value of amber; receive, review and discuss J. Marti's report regarding visit to General Directory of Mining and information obtained concerning valuation of Ammine's property with added value of amber.
12/13/16	1.00	E. Brache	Prepare letter and deliver documents (i.e. Preliminary Order, translation and Exequatur) to legal Director of the Superintendence of Securities and report to C. Soto; contact geologist to discuss his experience with valuations of land including the added value of the amber, meet with C. Soto and discuss.
12/14/16	2.77	E. Brache	Meet with C. Soto and discuss meeting held with the Minister of Environment and the Superintendence of Securities officials and review report prepared by J. Marti regarding his investigation before the General Directory of Mining; prepare report regarding valuation of land and other updates to client and send to C. Soto for her review.
12/14/16	0.40	J. Marti	Coordinate remittance of newspaper publication regarding the dissolution of Natural Gem, Ammine and Amn and the certification issued by the Dominican Accountant's registry

**SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI**

115953.00001

01/19/17

Thomas Seaman Company / Assets search related to litigation in CA

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Invoice Number: 9860545

NCF: A010010010200005725

establishing that Melfi Tapia is not registered as an accountant.

12/15/16	0.70	E. Brache	Receive, review and insert C. Soto's suggestions on report regarding valuation of land and other updates to client; review hard copy letter to Superintendence of Securities official regarding our request for cooperation/ information.
12/15/16	0.40	C. Soto Hernandez	Follow upon the updated report for client; revise report prepared by E. Brache; discuss further on pending tasks.
12/20/16	0.60	E. Brache	Follow up on first hearing date with J. Marti, receive report and discuss with J. Marti; prepare report to client indicating when the first hearing will take place and what is likely going to happen on said hearing.
12/28/16	1.00	E. Brache	Receive instructions from C. Soto to prepare list of items that we would like the Superintendence of Securities to request Customs and the Tax Authorities and send to J. Marti and C. Soto for comments and suggestions.
12/28/16	2.10	C. Soto Hernandez	Address several matters on pending tasks; exchange of several emails.
12/29/16	0.70	E. Brache	Receive and review comments on email to Superintendence of Securities from C. Soto and J. Marti, include suggestions to email and deliver to official.

**TOTAL HOURS FOR THIS MATTER: 34.27**

**TOTAL SERVICES: USD\$ 5,587.25**

**TIME SUMMARY**

<b>TIMEKEEPER</b>	<b>HOURLY RATE</b>	<b>HOURS</b>	<b>TOTAL</b>
Eugenia Brache	125.00	15.37	1,921.25
Josue Marti	95.00	9.00	855.00
Alejandro Pena-Prieto	390.00	1.50	585.00
Carolina Soto Hernandez	265.00	8.40	2,226.00
<b>TOTAL SERVICES:</b>		<b>34.27</b>	<b>USD\$ 5,587.25</b>

**SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI**

115953.00001

01/19/17

Thomas Seaman Company / Assets search related to litigation in CA

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Invoice Number: 9860545

NCF: A010010010200005725

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**DISBURSEMENT SUMMARY**

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Notary Charges	VENDOR: Santo Domingo - DOP Only INVOICE#: 76079_12312016 DATE: 12/31/2016 Cash Detail Santo Domingo 201612 - Tran Date 12/28/2016 - Hector Martín Suberví Mena - Bailiff Act 574/16 - Thomas Seaman -Sort line 280 - DOP 2400	52.06
Registration Fees	VENDOR: Santo Domingo - DOP Only INVOICE#: 76079_12162016 DATE: 12/16/2016 Cash Detail Santo Domingo 201612 - Tran Date 12/05/2016 - Diogenes Checo - Legal fees for authentic Act. In. dated 03/11/2016 -Sort line 633 - DOP 10000	215.39
Translating Charge	VENDOR: Santo Domingo - DOP Only INVOICE#: 76079_12312016 DATE: 12/31/2016 Cash Detail Santo Domingo 201612 - Tran Date 12/23/2016 - Hirayda Fernandez Guzman - Trans. Into spanish claim filed against Steve Chen et al. Inv. S- 193 - NCF A010010010100000193 Client: Thomas Seaman -Sort line 240 - DOP 23100	501.12

**TOTAL DISBURSEMENTS: USD\$ 768.57**

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**MATTER TOTAL**

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<b>TOTAL SERVICES:</b>	<b>USD\$ 5,587.25</b>
<b>TOTAL DISBURSEMENTS:</b>	<b>USD\$ 768.57</b>
<b>TOTAL AMOUNT DUE FOR THIS MATTER:</b>	<b>USD\$ 6,355.82</b>

## SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

Thomas Seaman Company  
Mr. Thomas A. Seaman, CFA  
3 Park Plaza  
Suite 550  
Irvine, California 92614

Invoice Number: 9868465  
NCF: A010010010200005807  
Invoice Date: 02/24/17  
Matter Number: 115953.00001

### Assets search related to litigation in CA

#### INVOICE SUMMARY

Fees:	USD\$ 2,443.15
Disbursements:	USD\$ 86.45
<b>Amount Due for this Invoice:</b>	<b>USD\$ 2,529.60</b>
Previous Invoices Outstanding as of the Date of this Invoice:	USD\$ 12,487.44
<b>TOTAL (INCLUDING OUTSTANDING INVOICES):</b>	<b>USD\$ 15,017.04</b>

#### PAYMENT INSTRUCTIONS

##### *Remit Check Payments to:*

Squire Patton Boggs (US) LLP  
200 South Biscayne Blvd, 47<sup>th</sup> Floor  
Miami, FL 33131  
Phone: 305.577.7000  
Fax: 305.577.7001

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SWIFT Code: CITIUS33 (INTERNATIONAL)  
Account Name: Squire Patton Boggs (US) LLP,  
International DR Operating Acct.  
Account #: 3200718328  
Reference: 9868465.115953

##### *Direct Billing Inquiries to:*

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Av. Pedro Henriquez Urena No. 157  
La Esperilla  
Santo Domingo  
Dominican Republic  
Phone: +1.809.472.4900  
Fax: +1.809.472.4999  
email: Carolina.Soto-  
Hernandez@squirepb.com

**Please Include Invoice Number with all Payments**

Tax Identification Number RNC #101-79813-2

## SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

Thomas Seaman Company  
Mr. Thomas A. Seaman, CFA  
3 Park Plaza  
Suite 550  
Irvine, California 92614

Invoice Number: 9868465  
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### REMITTANCE COPY

#### Assets search related to litigation in CA

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International DR Operating Acct.  
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Reference: 9868465.115953

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Carolina Soto Hernandez  
Av. Pedro Henriquez Urena No. 157  
La Esperilla  
Santo Domingo  
Dominican Republic  
Phone: +1.809.472.4900  
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Hernandez@squirepb.com

**Please Include Invoice Number with all Payments**

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**SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI**

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02/24/17

Thomas Seaman Company / Assets search related to litigation in CA

Page 1

Invoice Number: 9868465

NCF: A010010010200005807

**ASSETS SEARCH RELATED TO LITIGATION IN CA**

**LEGAL SERVICES**

<b>DATE</b>	<b>HOURS</b>	<b>TIMEKEEPER</b>	<b>NARRATIVE</b>
01/11/17	0.20	E. Brache	Exchange emails with Superintendence of Securities official regarding our requests for information before the Tax and Customs Authorities.
01/12/17	0.30	E. Brache	Follow up on emails with Superintendence of Securities official regarding our requests for information before the Tax and Customs Authorities and report to C. Soto.
01/16/17	1.00	E. Brache	Receive instructions from C. Soto to prepare report to client regarding advances made before Superintendence of Securities; monitor newspapers for any publication on Steve Chen related entities.
01/17/17	0.50	C. Soto Hernandez	Review pending tasks; receive call from counsel for Ammine; draft and send email to client' review and exchange emails with client.
01/18/17	0.20	E. Brache	Attention to email on pending tasks; exchange email with client to coordinate conference call.
01/23/17	0.30	E. Brache	Follow up on SEC pending tasks claim with J. Marti.
01/25/17	0.77	E. Brache	Conference call with T. Seaman, A. Juroe and A. Schoor to discuss status of case and next steps.
01/25/17	0.80	J. Marti	Conference call with T. Seaman, A. Schoor, A. Juroe and SPB Team; discuss case updates and pending task; receive instructions to file Second Interim Application for SPB; request invoices for November and December in order to prepare Second Interim Application.
01/25/17	1.30	C. Soto Hernandez	Prepare for and attend conference call.
01/26/17	0.30	E. Brache	Meet with J. MArti and C. Soto to discuss and divide tasks going forward.
01/26/17	3.90	C. Soto Hernandez	Travel to and meet with representatives of the Superintendence of Securities to follow upon requests made to Customs and the National Tax Authority; meet with E. Brache and J. Marti regarding pending tasks; conference call with in house counsel for the Ministry of Environment coordinating meeting with vice minister of mines.
01/31/17	3.10	J. Marti	Work on Second Interim Application of Squire Patton Boggs in order to seek approval for payment; report to C. Soto.



**SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI**

115953.00001

02/24/17

Thomas Seaman Company / Assets search related to litigation in CA

Page 2

Invoice Number: 9868465

NCF: A010010010200005807

**TOTAL HOURS FOR THIS MATTER: 12.67**

**TOTAL SERVICES: USD\$ 2,443.15**

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**TIME SUMMARY**

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<b>TIMEKEEPER</b>	<b>HOURLY RATE</b>	<b>HOURS</b>	<b>TOTAL</b>
Eugenia Brache	145.00	3.07	445.15
Josue Marti	125.00	3.90	487.50
Carolina Soto Hernandez	265.00	5.70	1,510.50
<b>TOTAL SERVICES:</b>		<b>12.67</b>	<b>USD\$ 2,443.15</b>

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**DISBURSEMENT SUMMARY**

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Telephone	86.45
<b>TOTAL DISBURSEMENTS:</b>	<b>USD\$ 86.45</b>

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**MATTER TOTAL**

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<b>TOTAL SERVICES:</b>	<b>USD\$ 2,443.15</b>
<b>TOTAL DISBURSEMENTS:</b>	<b>USD\$ 86.45</b>
<b>TOTAL AMOUNT DUE FOR THIS MATTER:</b>	<b>USD\$ 2,529.60</b>