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4 Chicago, IL 60602  
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8 Consultants to Receiver  
9 Thomas A. Seaman

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

13 SECURITIES AND EXCHANGE  
14 COMMISSION,

15 Plaintiff,

16 v.

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

Defendants.

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

**FOURTH INTERIM FEE  
APPLICATION OF BERKELEY  
RESEARCH GROUP, LLC**

Date: June 26, 2017  
Time: 9:00 a.m.  
Ctm.: 850  
Judge: Hon. R. Gary Klausner

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**INTRODUCTION**

Berkeley Research Group, LLC (“BRG”), consultants to Thomas Seaman, the court-appointed Receiver of Defendants USFIA, Inc., Alliance Financial Group, Inc., Amauction, Inc., Aborell Mgmt I, LLC, Aborell Advisors I, LLC, Aborell REIT II, LLC, Ahome Real Estate, LLC, Alliance NGN, Inc., Apollo REIT I, LLC, Apollo REIT II, LLC, Amkey, Inc., US China Consultation Association, and Quail Ranch Golf Club, LLC (collectively, the “Receivership Entities”), hereby submits this Fourth Interim Application for Payment of Fees and Reimbursement of Expenses (the “Fourth Application”). The Application covers the period from October 1, 2016 through March 31, 2017 (the “Fourth Application Period”).

BRG previously filed a First, Second and Third Interim Fee Application, for the period of September 28, 2015 through September 30, 2016 (the “Prior Application Periods”). BRG requested, and the Court approved \$243,605.05 in fees and \$24,687.20 in costs for the Prior Application Periods. The Court authorized the Receiver to pay out of assets of the Receivership Estate 90% of the allowed fees, equal to \$216,544.55, and 100% of the allowed costs.

By this Fourth Interim Fee Application, BRG seeks compensation for professional fees totaling \$20,235.00 and \$1,652.54 in expenses incurred during the Fourth Application Period. BRG now requests that the Court approve such fees and expenses on an interim basis, and enter an Order authorizing the Receiver to pay 90% of the fees (\$18,211.50) and 100% of expenses incurred.

**SERVICES PERFORMED DURING THE FOURTH APPLICATION PERIOD**

On or about September 28, 2015, the Court appointed Thomas Seaman on a temporary basis. The Receiver was authorized to, among other things, to (1) collect and take custody, control, and possession of all assets and premises of the Receivership Entities; (2) conduct such investigation and discovery as may be

1 necessary to locate and account for all assets of or managed by the Receivership  
2 Entities; (3) take such action as is necessary and appropriate to preserve and take  
3 control of and to prevent the dissipation, concealment, or disposition of any assets of  
4 or managed by the Receivership Entities; (4) have access to and monitor all mail,  
5 electronic mail, and video phone of the Receivership Entities; and (4) to employ  
6 attorneys, accountants, consultants, and other persons to assist in such investigation  
7 and discovery.

8 Reasonably detailed descriptions of the fees and expenses incurred by BRG  
9 during the Fourth Application Period are included in the invoices attached hereto as  
10 Exhibit A.

11 As summarized below, BRG provided services in the following categories  
12 during the Fourth Application Period:

- 13 1. Database Analysis and Reporting
- 14 2. On-Site Support

15 The Receiver instructed BRG to undertake these tasks, approved the amounts  
16 billed by BRG in connection with these tasks, and instructed BRG to prepare this  
17 Application. BRG completed these tasks as efficiently as possible given the time  
18 constraints, amount of data requested to be preserved, and analysis performed.

19 **1. Database Analysis and Reporting**

20 BRG analyzed various databases hosted by the Receivership Entities and  
21 reported on the following:

- 22 • Analyze the front end of the Ahome database to identify key fields to be  
23 able to produce full reports from the backend database. Analyzed the  
24 backend Ahome database structure to be able to generate reports.

25 In order to complete these activities, BRG staff was required to spend 41.50  
26 hours resulting in fees in the amount of \$14,295.00.

1                   **2. On-Site Support**

2                   BRG staff provided on-site IT related support to the US Attorney General's  
3 office and other government agencies while conducting interviews of former USFIA  
4 employees, providing access to former employee's computers and the various files,  
5 websites, and databases used during their employment at USFIA.

6                   In order to complete these activities, BRG staff was required to spend 16.50  
7 hours resulting in fees in the amount of \$5,940.00.

8                   **EXPENSES**

9                   In order to complete each of the above tasks, BRG incurred \$1,652.54 in  
10 expenses during the application period summarized as follows:

11

Description	Amount
Travel (Air, Lodging, Car)	\$640.78
Admin Fee	\$1,011.76
<b>Total</b>	<b>\$1,652.54</b>

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17                   The expenses covered under our 5% standard admin fee relate to specialized  
18 computer software purchased for this matter together with equipment costs such as  
19 Network Attached Storage Devices, Certified Blank Hard Drives, Data Backup  
20 Systems, High Speed Network, Telecommunications, Internal Copying and Printing,  
21 Itemized Supplies.

22                   **BRG'S FEES AND EXPENSES ARE REASONABLE AND APPROPRIATE**

23                   The amounts sought in this Application are reasonable for the professional  
24 services performed by BRG on behalf of the Receiver and the Receivership Entities.  
25 BRG believes the services rendered constitute necessary and appropriate services to  
26 assist the Receiver in carrying out his duties and obligations. Moreover, BRG  
27 believes that the services rendered provided substantial benefit to the Receiver and  
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the Receivership Entities and therefore respectfully submits that its fees and expenses are fair and reasonable and should be approved on an interim basis.

**CONCLUSION**

Accordingly, BRG respectfully requests that the Court enter an Order approving, on an interim basis, BRG’s fees in the amount of \$20,235.00, its expenses in the amount of \$1,652.54, and authorizing the Receiver to pay BRG 90% of its fees incurred, or \$18,211.50, and 100% of its expenses, in the amount of \$1,652.54.

Dated: May 16, 2017                      BERKELEY RESEARCH GROUP, LLC



Marvin A. Tenenbaum  
Senior Vice President & Senior Counsel

# **EXHIBIT A**



Thomas Seaman  
 Thomas Seaman Company  
 3 Park Plaza, Suite 550  
 Irvine, CA 92614

November 18, 2016  
 Client-Matter: 7733-11355  
 Invoice #: 46705  
 Tax ID # 27-1451273

Via Email: [tom@thomasseaman.com](mailto:tom@thomasseaman.com)

**RE: SEC v. US Fine Investments Arts Inc**

Services Rendered Through October 31, 2016

Professional Services	\$ 1,925.00	USD
Expenses Incurred	<u>96.25</u>	
<b>CURRENT CHARGES</b>	<b>\$ 2,021.25</b>	<b>USD</b>
 <i><b>OUTSTANDING INVOICES</b></i>		
Invoice # 39745 - Dated 03/21/16	2,777.64	
Invoice # 40686 - Dated 04/28/16	1,522.50	
Invoice # 41318 - Dated 05/19/16	2,326.25	
Invoice # 42315 - Dated 07/07/16	9,929.07	
Invoice # 42990 - Dated 07/20/16	9,770.10	
Invoice # 45031 - Dated 09/28/16	4,985.80	
Invoice # 45885 - Dated 10/26/16	8,260.68	
<b>BALANCE DUE</b>	<b>\$ 41,593.29</b>	<b>USD</b>

**PAYMENT IS DUE BY December 18, 2016**

Please direct questions regarding this invoice to: Michael Bandemer at (619) 823-8867 or [mbandemer@thinkbrg.com](mailto:mbandemer@thinkbrg.com).

**Please remit payment by check to:**

Berkeley Research Group, LLC  
 2200 Powell Street, Suite 1200  
 Emeryville, CA 94608

**Please remit payment by wire or ACH to:**

Bank Name: PNC Bank, N.A.  
 SWIFT: PNCCUS33ENJ  
 ABA #: 031207607  
 Account Name: Berkeley Research Group, LLC  
 Account #: 8026286672  
 Reference: 46705

Remittance advices are to be sent to:  
[remitadvice@thinkbrg.com](mailto:remitadvice@thinkbrg.com)



To: Thomas Seaman  
c/o: Thomas Seaman Company  
RE: SEC v. US Fine Investments Arts Inc

Page 2 of 3  
Invoice # 46705  
Client-Matter: 07733-011355

Services Rendered Through October 31, 2016

**PROFESSIONAL SERVICES**

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
<b>Senior Managing Consultant</b> David Jimenez	350.00	5.50	1,925.00
<b>Total Professional Services</b>		<u>5.50</u>	<u>1,925.00</u>

**EXPENSES**

In-House Costs: Technology, Fax, Phone, Supplies & Photocopies			<u>96.25</u>
<b>Total Expenses</b>			<b>96.25</b>





To: Thomas Seaman  
c/o: Thomas Seaman Company  
RE: SEC v. US Fine Investments Arts Inc

Page 3 of 3  
Invoice # 46705  
Client-Matter: 07733-011355

Services Rendered Through October 31, 2016

**DETAIL OF PROFESSIONAL SERVICES**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
10/10/16	David Jimenez	Database analysis.	2.50
10/11/16	David Jimenez	Database analysis.	3.00
<b>Professional Services</b>			<b>5.50</b>



Thomas Seaman  
Thomas Seaman Company  
3 Park Plaza, Suite 550  
Irvine, CA 92614

December 23, 2016  
Client-Matter: 7733-11355  
Invoice #: 47816  
Tax ID # 27-1451273

Via Email: tom@thomasseaman.com

**RE: SEC v. US Fine Investments Arts Inc**

Services Rendered Through November 30, 2016

Professional Services	\$	4,287.50	USD
Expenses Incurred		<u>214.38</u>	
<b>CURRENT CHARGES</b>	<b>\$</b>	<b>4,501.88</b>	<b>USD</b>
<b>OUTSTANDING INVOICES</b>			
Invoice # 39745 - Dated 03/21/16		2,777.64	
Invoice # 40686 - Dated 04/28/16		1,522.50	
Invoice # 41318 - Dated 05/19/16		2,326.25	
Invoice # 42315 - Dated 07/07/16		9,929.07	
Invoice # 42990 - Dated 07/20/16		9,770.10	
Invoice # 45031 - Dated 09/28/16		4,985.80	
Invoice # 45885 - Dated 10/26/16		8,260.68	
Invoice # 46705 - Dated 11/18/16		2,021.25	
<b>BALANCE DUE</b>	<b>\$</b>	<b>46,095.17</b>	<b>USD</b>

**PAYMENT IS DUE BY January 22, 2017**

Please direct questions regarding this invoice to: Michael Bandemer at (619) 823-8867 or mbandemer@thinkbrg.com.

**Please remit payment by check to:**

Berkeley Research Group, LLC  
2200 Powell Street, Suite 1200  
Emeryville, CA 94608

**Please remit payment by wire or ACH to:**

Bank Name: PNC Bank, N.A.  
SWIFT: PNCCUS33ENJ  
ABA #: 031207607  
Account Name: Berkeley Research Group, LLC  
Account #: 8026286672  
Reference: 47816

Remittance advices are to be sent to:  
remitadvice@thinkbrg.com



To: Thomas Seaman  
c/o: Thomas Seaman Company  
RE: SEC v. US Fine Investments Arts Inc

Page 2 of 3  
Invoice # 47816  
Client-Matter: 07733-011355

Services Rendered Through November 30, 2016

**PROFESSIONAL SERVICES**

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
<b>Senior Managing Consultant</b> David Jimenez	350.00	12.25	4,287.50
<b>Total Professional Services</b>		<u>12.25</u>	<u>4,287.50</u>

**EXPENSES**

In-House Costs: Technology, Fax, Phone, Supplies & Photocopies			<u>214.38</u>
<b>Total Expenses</b>			<b>214.38</b>



To: Thomas Seaman  
c/o: Thomas Seaman Company  
RE: SEC v. US Fine Investments Arts Inc

Page 3 of 3  
Invoice # 47816  
Client-Matter: 07733-011355

Services Rendered Through November 30, 2016

**DETAIL OF PROFESSIONAL SERVICES**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
11/14/16	David Jimenez	Exporting Ahome screenshots. Ahome database analysis.	3.00
11/15/16	David Jimenez	Exporting Ahome screenshots. Ahome database analysis.	2.50
11/16/16	David Jimenez	Exporting Ahome screenshots. Ahome database analysis.	2.25
11/17/16	David Jimenez	Exporting Ahome screenshots. Ahome database analysis.	1.50
11/18/16	David Jimenez	Exporting Ahome screenshots. Ahome database analysis.	3.00
<b>Professional Services</b>			<b>12.25</b>



Thomas Seaman  
Thomas Seaman Company  
3 Park Plaza, Suite 550  
Irvine, CA 92614

February 27, 2017  
Client-Matter: 7733-11355  
Invoice #: 49775  
Tax ID # 27-1451273

Via Email: tom@thomasseaman.com

**RE: SEC v. US Fine Investments Arts Inc**

Services Rendered Through January 31, 2017

Professional Services	\$	4,302.50	USD
Expenses Incurred		<u>855.91</u>	
<b>CURRENT CHARGES</b>	<b>\$</b>	<b>5,158.41</b>	<b>USD</b>
<b>OUTSTANDING INVOICES</b>			
Invoice # 39745 - Dated 03/21/16		2,777.64	
Invoice # 40686 - Dated 04/28/16		1,522.50	
Invoice # 41318 - Dated 05/19/16		2,326.25	
Invoice # 42315 - Dated 07/07/16		945.62	
Invoice # 42990 - Dated 07/20/16		1,125.10	
Invoice # 45031 - Dated 09/28/16		385.00	
Invoice # 45885 - Dated 10/26/16		1,032.50	
Invoice # 46705 - Dated 11/18/16		2,021.25	
Invoice # 47816 - Dated 12/23/16		4,501.88	
<b>BALANCE DUE</b>	<b>\$</b>	<b>21,796.15</b>	<b>USD</b>

**PAYMENT IS DUE BY March 29, 2017**

Please direct questions regarding this invoice to: Michael Bandemer at (619) 823-8867 or mbandemer@thinkbrg.com.

**Please remit payment by check to:**  
Berkeley Research Group, LLC  
2200 Powell Street, Suite 1200  
Emeryville, CA 94608

**Please remit payment by wire or ACH to:**  
Bank Name: PNC Bank, N.A.  
SWIFT: PNCCUS33ENJ  
ABA #: 031207607  
Account Name: Berkeley Research Group, LLC  
Account #: 8026286672  
Reference: 49775

Remittance advices are to be sent to:  
remitadvice@thinkbrg.com



To: Thomas Seaman  
c/o: Thomas Seaman Company  
RE: SEC v. US Fine Investments Arts Inc

Page 2 of 3  
Invoice # 49775  
Client-Matter: 07733-011355

Services Rendered Through January 31, 2017

**PROFESSIONAL SERVICES**

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
<b>Senior Managing Consultant</b>			
David Jimenez	360.00	7.75	2,790.00
<b>Consultant</b>			
Zhe Wang	275.00	5.50	1,512.50
<b>Total Professional Services</b>		<b>13.25</b>	<b>4,302.50</b>

**EXPENSES**

Meals - Other (100% Deductible)			28.74
Travel - Airline			251.94
Travel - Hotel/Lodging			233.91
Travel - Parking			23.15
Travel - Taxi, Car Rental, Toll, Train			103.04
In-House Costs: Technology, Fax, Phone, Supplies & Photocopies			215.13
<b>Total Expenses</b>			<b>855.91</b>



To: Thomas Seaman  
c/o: Thomas Seaman Company  
RE: SEC v. US Fine Investments Arts Inc

Page 3 of 3  
Invoice # 49775  
Client-Matter: 07733-011355

Services Rendered Through January 31, 2017

**DETAIL OF PROFESSIONAL SERVICES**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
01/25/17	David Jimenez	Generated output from Ahome database.	2.50
01/26/17	David Jimenez	Generated output from Ahome database.	2.75
01/27/17	David Jimenez	Generated output from Ahome database.	2.50
01/30/17	Zhe Wang	Material Translation.	5.50
<b>Professional Services</b>			<b>13.25</b>



Thomas Seaman  
Thomas Seaman Company  
3 Park Plaza, Suite 550  
Irvine, CA 92614

March 31, 2017  
Client-Matter: 7733-11355  
Invoice #: 50852  
Tax ID # 27-1451273

Via Email: tom@thomasseaman.com

**RE: SEC v. US Fine Investments Arts Inc**

Services Rendered Through February 28, 2017

Professional Services	\$	5,220.00	USD
Expenses Incurred		261.00	
<b>CURRENT CHARGES</b>	<b>\$</b>	<b>5,481.00</b>	<b>USD</b>

**OUTSTANDING INVOICES**

Invoice # 39745 - Dated 03/21/16	2,777.64		
Invoice # 40686 - Dated 04/28/16	1,522.50		
Invoice # 41318 - Dated 05/19/16	2,326.25		
Invoice # 42315 - Dated 07/07/16	945.62		
Invoice # 42990 - Dated 07/20/16	1,125.10		
Invoice # 45031 - Dated 09/28/16	385.00		
Invoice # 45885 - Dated 10/26/16	1,032.50		
Invoice # 46705 - Dated 11/18/16	2,021.25		
Invoice # 47816 - Dated 12/23/16	4,501.88		
Invoice # 49775 - Dated 02/27/17	5,158.41		
<b>BALANCE DUE</b>	<b>\$</b>	<b>27,277.15</b>	<b>USD</b>

**PAYMENT IS DUE BY April 30, 2017**

Please direct questions regarding this invoice to: Michael Bandemer at (619) 823-8867 or mbandemer@thinkbrg.com.

**Please remit payment by check to:**

Berkeley Research Group, LLC  
2200 Powell Street, Suite 1200  
Emeryville, CA 94608

**Please remit payment by wire or ACH to:**

Bank Name: PNC Bank, N.A.  
SWIFT: PNCCUS33ENJ  
ABA #: 031207607  
Account Name: Berkeley Research Group, LLC  
Account #: 8026286672  
Reference: 50852

Remittance advices are to be sent to:  
remitadvice@thinkbrg.com





To: Thomas Seaman  
c/o: Thomas Seaman Company  
RE: SEC v. US Fine Investments Arts Inc

Page 2 of 3  
Invoice # 50852  
Client-Matter: 07733-011355

Services Rendered Through February 28, 2017

**PROFESSIONAL SERVICES**

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
<b>Senior Managing Consultant</b> David Jimenez	360.00	14.50	5,220.00
<b>Total Professional Services</b>		<u>14.50</u>	<u>5,220.00</u>

**EXPENSES**

In-House Costs: Technology, Fax, Phone, Supplies & Photocopies			<u>261.00</u>
<b>Total Expenses</b>			<b>261.00</b>



To: Thomas Seaman  
c/o: Thomas Seaman Company  
RE: SEC v. US Fine Investments Arts Inc

Page 3 of 3  
Invoice # 50852  
Client-Matter: 07733-011355

Services Rendered Through February 28, 2017

**DETAIL OF PROFESSIONAL SERVICES**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
02/04/17	David Jimenez	Provided support and participated in interviews of former USFIA employees.	9.00
02/07/17	David Jimenez	Exported reports from Ahome database.	3.00
02/09/17	David Jimenez	Exported reports from Ahome Database.	2.50
<b>Professional Services</b>			<b>14.50</b>



Thomas Seaman  
Thomas Seaman Company  
3 Park Plaza, Suite 550  
Irvine, CA 92614

May 3, 2017  
Client-Matter: 7733-11355  
Invoice #: 51919  
Tax ID # 27-1451273

Via Email: tom@thomasseaman.com

**RE: SEC v. US Fine Investments Arts Inc**

Services Rendered Through March 31, 2017

Professional Services	\$ 4,500.00	USD
Expenses Incurred	225.00	
<b>CURRENT CHARGES</b>	<b>\$ 4,725.00</b>	<b>USD</b>
<b>OUTSTANDING INVOICES</b>		
Invoice # 39745 - Dated 03/21/16	2,777.64	
Invoice # 40686 - Dated 04/28/16	1,522.50	
Invoice # 41318 - Dated 05/19/16	2,326.25	
Invoice # 42315 - Dated 07/07/16	945.62	
Invoice # 42990 - Dated 07/20/16	1,125.10	
Invoice # 45031 - Dated 09/28/16	385.00	
Invoice # 45885 - Dated 10/26/16	1,032.50	
Invoice # 46705 - Dated 11/18/16	2,021.25	
Invoice # 47816 - Dated 12/23/16	4,501.88	
Invoice # 49775 - Dated 02/27/17	5,158.41	
Invoice # 50852 - Dated 03/31/17	5,481.00	
<b>BALANCE DUE</b>	<b>\$ 32,002.15</b>	<b>USD</b>

**PAYMENT IS DUE BY June 2, 2017**

Please direct questions regarding this invoice to: Michael Bandemer at (619) 823-8867 or mbandemer@thinkbrg.com.

**Please remit payment by check to:**

Berkeley Research Group, LLC  
2200 Powell Street, Suite 1200  
Emeryville, CA 94608

**Please remit payment by wire or ACH to:**

Bank Name: PNC Bank, N.A.  
SWIFT: PNCCUS33ENJ  
ABA #: 031207607  
Account Name: Berkeley Research Group, LLC  
Account #: 8026286672  
Reference: 51919

Remittance advices are to be sent to:  
remitadvice@thinkbrg.com



To: Thomas Seaman  
c/o: Thomas Seaman Company  
RE: SEC v. US Fine Investments Arts Inc

Page 2 of 3  
Invoice # 51919  
Client-Matter: 07733-011355

Services Rendered Through March 31, 2017

**PROFESSIONAL SERVICES**

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
<b>Senior Managing Consultant</b> David Jimenez	360.00	12.50	4,500.00
<b>Total Professional Services</b>		<u>12.50</u>	<u>4,500.00</u>

**EXPENSES**

In-House Costs: Technology, Fax, Phone, Supplies & Photocopies			<u>225.00</u>
<b>Total Expenses</b>			<b>225.00</b>



To: Thomas Seaman  
c/o: Thomas Seaman Company  
RE: SEC v. US Fine Investments Arts Inc

Page 3 of 3  
Invoice # 51919  
Client-Matter: 07733-011355

Services Rendered Through March 31, 2017

**DETAIL OF PROFESSIONAL SERVICES**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
03/07/17	David Jimenez	Provided on site support as USFIA facility.	7.50
03/23/17	David Jimenez	Performed Ahome database analysis.	2.25
03/24/17	David Jimenez	Performed Ahome database analysis.	2.75
<b>Professional Services</b>			<b>12.50</b>