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12 THOMAS SEAMAN

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14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA
16 WESTERN DIVISION

17 SECURITIES AND EXCHANGE
COMMISSION,

18 Plaintiff,

19 v.

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

26 Defendants.
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Case No. 2:15-cv-07425 RGK (PLAx)

ASSIGNED FOR ALL PURPOSES TO
Judge R. Gary Klausner

[PROPOSED] ORDER GRANTING
MOTION FOR AUTHORITY TO
PURSUE CLAIMS AGAINST WEI HE,
THE WEI HE TRUST DATED JULY 1,
2005, AHOMELAND, INC., AND
GOLDEN ARK, INC.

Date: November 20, 2017
Time: 9:00 a.m.
Ctrm: 850

Complaint Filed: September 28, 2015

[PROPOSED] ORDER

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The Court, having considered the Motion for Authority to Pursue Claims Against Wei He, the Wei He Trust dated July 1, 2005, Ahomeland, Inc., and Golden Ark, Inc. ("Motion"), filed by Thomas Seaman, Court-appointed receiver for 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, Inc., Apollo REIT II, LLC, Amkey, Inc., US China Consultation Association, Quail Ranch Golf Course, LLC, and their subsidiaries and affiliates (collectively, "Receivership Entities"), and good cause appearing therefor, hereby orders as follows:

1. The Receiver's Motion is granted;
2. The Receiver is authorized to initiate, pursue, and prosecute claims against Wei He, the Wei He Trust dated July 1, 2005, Ahomeland, Inc., and Golden Ark, Inc. (collectively, "Proposed Defendants"), for recovery of assets they received, either directly or indirectly, from the Receivership Entities, and for recovery of funds paid by the Receivership Entities directly to Proposed Defendants or to third-parties on their behalf and for their benefit;
3. The Receiver is further authorized to initiate, pursue, and prosecute similar claims against any other individuals or entities related to or affiliated with Wei He who received transfers, directly or indirectly, from the Receivership Entities; and
4. The Receiver shall file his complaint against the Proposed Defendants within 60 days of the entry of this Order.

Dated: _____, 2017

R. Gary Klausner
Judge, United States District Court