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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

STEVE CHEN, 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, and
QUAIL RANCH GOLF COURSE, LLC,

Defendants.

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

**[PROPOSED] ORDER GRANTING
RECEIVER THOMAS A SEAMAN'S
MOTION TO APPROVE
(1) RECEIVER'S
RECOMMENDATIONS AS TO
ALLOWED CLAIMS; (2)
RECEIVER'S
RECOMMENDATIONS AS TO
DISPUTED CLAIMS;
(3) AUTHORIZATION TO LIMIT
SCOPE OF RECEIVERSHIP TO
IDENTIFIED RECEIVERSHIP
ENTITIES; AND (4) DISTRIBUTION
PLAN**

Date: February 1, 2021
Time: 9:00 a.m.
Ctrm: 850
Judge Hon.R. Gary Klausner

Before this Court is the Motion of Thomas A. Seaman, the Court-appointed permanent receiver (“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”), to Approve (1) Receiver’s Recommendations

1 as to Allowed Claims; (2) Receiver's Recommendations as to Disputed Claims;
2 (3) Authorization to Limit Scope of Receivership to Identified Receivership Entities;
3 and (4) Distribution Plan (the "Claims Allowance Motion" or "Motion").

4 Specifically, the Receiver seeks Court approval of the Allowed Claims and
5 disallowed claims as set forth in Exhibits A - Exhibit C attached to the Declaration
6 of Thomas A. Seaman, ("Seaman Declaration") filed concurrently herewith.

7 By this Motion, the Receiver also seeks approval of the Distribution Plan,
8 which provides for the distribution of money recovered by the Receiver. A true and
9 correct copy of the Distribution Plan is attached to the Seaman Declaration as
10 Exhibit E.

11 The Receiver met and conferred with the Securities and Exchange
12 Commission prior to filing this Motion. The foundation and detailed basis for the
13 Motion and the Distribution Plan are set forth in the concurrently filed
14 Memorandum of Points and Authorities, the supporting Declaration of Thomas A.
15 Seaman and the exhibits thereto.

16 Having considered Receiver's Motion and having found that good and proper
17 notice has been provided, and good cause appearing therefor,

- 18 1. The Receiver's Motion is GRANTED, in its entirety;
- 19 2. The list of proposed Allowed Claims, as reflected in Exhibits A - C to
20 the Seaman Declaration are approved;
- 21 3. The Receiver's recommendations concerning the disputed and
22 disallowed claims identified in Exhibits A - D to the Seaman Declaration are
23 approved and such claims are hereby wholly or partial disallowed as reflected
24 therein and in accordance with the Motion..
- 25 4. The scope of the Receiver's authority and duties pursuant to Court's
26 Appointment Order, is limited the 11 specific corporate entities, the Receivership
27 Entities, as defined in the Motion. As such, the Receiver will only be filing tax
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1 returns on behalf of those 11 entities, to the extent required, along the Receivership
2 Estate's Qualified Settlement Fund returns.

3 5. The Distribution Plan attached as Exhibit E to the Seaman Declaration
4 is approved.

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6 **SO ORDERED.**

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8 Dated: _____

Hon. R. Gary Klausner
Judge, United States District Court

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