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11 Attorneys for Receiver
12 THOMAS A. SEAMAN

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

16 SECURITIES AND EXCHANGE
COMMISSION,

17 Plaintiff,

18 v.

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

25 Defendants.

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

**NOTICE OF MOTION AND
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
IDENTIFIED RECEIVERSHIP
ENTITIES; AND (4) DISTRIBUTION
PLAN**

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

1 **TO ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE THAT** on February 1, 2021 at 9:00 a.m., in
3 Courtroom 850 of the above-entitled Court, located at 255 East Temple Street, Los
4 Angeles, California, Thomas A. Seaman, the Court-appointed permanent receiver
5 (“Receiver”) for Defendants USFIA, Inc., Alliance Financial Group, Inc.,
6 Amauction, Inc., Aborell Mgmt I, LLC, Aborell Advisors I, LLC, Aborell
7 REIT II, LLC, Ahome Real Estate, LLC, Alliance NGN, Inc., Apollo REIT I, Inc.,
8 Apollo REIT II, LLC, Amkey, Inc., US China Consultation Association, Quail
9 Ranch Golf Course, LLC, and their subsidiaries and affiliates (collectively,
10 “Receivership Entities”), hereby submits this Motion to Approve (1) Receiver’s
11 Recommendations as to Allowed Claims; (2) Receiver’s Recommendations as to
12 Disputed Claims; (3) Authorization to Limit Scope of Receivership to Identified
13 Receivership Entities; and (4) Distribution Plan (the "Claims Allowance Motion").
14 Specifically, the Receiver seeks Court approval of the Allowed Claims and
15 disallowed claims as set forth in Exhibits A - D attached to the Declaration of
16 Thomas A. Seaman, ("Seaman Declaration") filed concurrently herewith.

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

21 The Receiver met and conferred with the Securities and Exchange
22 Commission prior to filing this Motion. The foundation and detailed basis for the
23 Motion and the Distribution Plan are set forth in the concurrently filed
24 Memorandum of Points and Authorities, the supporting Declaration of Thomas A.
25 Seaman and the exhibits thereto, the documents and pleadings already on file in this
26 action, and upon such further oral and documentary evidence as may be presented at
27 time of hearing on the Motion.

28 **Procedural Requirements:** If you oppose this Motion, you are required to

1 file your written opposition with the Office of the Clerk, United States District
2 Court, 255 East Temple Street, Los Angeles, California 90012-3332, and serve the
3 same on the undersigned not later than 21 days prior to the hearing.

4 IF YOU FAIL TO FILE AND SERVE A WRITTEN OPPOSITION by the
5 above date, the Court may grant the requested relief without further notice. This
6 Motion is made following the conference of counsel pursuant to L.R. 7 3.

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8 Dated: December 7, 2020

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
DAVID R. ZARO

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10
11 By: /s/ David R. Zaro
12 DAVID R. ZARO
13 Attorneys for Receiver
14 Thomas A. Seaman
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