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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
20 v.
21 STEVE CHEN, USFIA, INC.,
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.

Case No. 2:15-cv-07425 RGK (PLAx)
ASSIGNED FOR ALL PURPOSES TO
Judge R. Gary Klausner
DECLARATION OF TIM C. HSU IN
SUPPORT OF 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

DECLARATION OF TIM C. HSU

I, Tim C. Hsu, declare as follows:

1. I am an attorney at the law firm of Allen Matkins Leck Gamble Mallory & Natsis LLP, counsel of record for Thomas Seaman, permanent receiver for defendants USFIA, Inc. ("USFIA"), 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, and their subsidiaries and affiliates (collectively, the "Receivership Entities").

2. This Declaration is made in support of the Receiver's Motion for Authority to Pursue Claims Against Wei He, the Wei He Trust dated July 1, 2005, Ahomeland, Inc., and Golden Ark, Inc. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify to such facts under oath.

3. In assisting the Receiver with his investigation of the transfers of assets and fund to Wei He, her trust, and her related companies, I corresponded with counsel representing Wei He, including her former counsel Mr. Robert Hsu of Lexint Law P.C., and her present counsel Ms. Mary Sun of the Law Office of Mary Sun. In our correspondence, I made a number of demands for Wei He to return assets she received, including the residential real properties located at 5088 Scholarship, Irvine, CA (the "Scholarship Property") and 363 Monterey Pines Drive, Arcadia, CA (the "Monterey Pines Property") (together, the "Properties"), including most recently by email correspondence with Ms. Sun in July 2017.

4. Notwithstanding my demands on behalf the Receiver, Wei He has not agreed to turn over title to the Properties. Rather, Wei He has demanded that she be allowed to pay the Receiver some undefined sum and keep the Properties, along with the benefit of any inherent increase in value since the Properties were purchased. Specifically, through Ms. Sun, Wei He suggested that the Receiver

1 accept a return of funds that the Receivership Entities paid for the Properties
2 reduced by some undefined amount for funds Wei He claims to have spent on the
3 Properties. Wei He also claimed that any funds she returned to the Receiver must be
4 offset by other funds in accounts that were frozen and turned over to the Receiver at
5 the outset of this action. I informed Ms. Sun on or around July 18, 2017 that the
6 Receiver is willing to consider reimbursement for Wei He's claimed expenditures
7 but title to the Properties must be turned over immediately and documentation
8 provided to substantiate Wei He's claims. I further informed Ms. Sun that if Wei He
9 did not agree to turnover title to the Properties, the Receiver would take action to
10 pursue a lawsuit for fraudulent transfer. However, I received no further substantive
11 response to the Receiver's demands and received no documentation from Ms. Sun to
12 substantiate Wei He's claims of entitlement to setoff.

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14 I declare under penalty of perjury under the laws of the State of California
15 that the foregoing is true and correct.

16 Executed this 17th day of October, 2017, at Los Angeles, California.

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/s/ *Tim C. Hsu*

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TIM C. HSU

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