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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 APPROVING
RECEIVER'S AMENDED
DISTRIBUTION PLAN**

Date: June 6, 2022
Time: 9:00 am
Ctrm: 850
Judge Hon.R. Gary Klausner

22 Before this Court is the Motion of Thomas A. Seaman, the Court-appointed
23 permanent receiver (“Receiver”) for Defendants USFIA, Inc., Alliance Financial
24 Group, Inc., Amauction, Inc., Aborell Mgmt I, LLC, Aborell Advisors I, LLC,
25 Aborell REIT II, LLC, Ahome Real Estate, LLC, Alliance NGN, Inc., Apollo
26 REIT I, Inc., Apollo REIT II, LLC, Amkey, Inc., US China Consultation
27 Association, Quail Ranch Golf Course, LLC, and their subsidiaries and affiliates
28 (collectively, “Receivership Entities”), to Approve the Receiver’s Amended

1 Distribution Plan (the "Motion"). Specifically, the Receiver seeks Court approval
2 of the Amended Distribution Plan as set forth in Exhibit A attached to the
3 Declaration of Thomas A. Seaman, ("Seaman Declaration") filed concurrently
4 herewith. The Amended Distribution Plan provides for the distribution of money
5 recovered by the Receiver.

6 The Receiver met and conferred with the Securities and Exchange
7 Commission prior to filing this Motion. The foundation and detailed basis for the
8 Motion and Amended Distribution Plan are set forth in the concurrently filed
9 Memorandum of Points and Authorities, the supporting Declaration of Thomas A.
10 Seaman and the exhibits thereto.

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

- 13 1. The Receiver's Motion is GRANTED, in its entirety;
- 14 2. The Amended Distribution Plan attached as Exhibit A to the Seaman
15 Declaration is approved.
- 16 3. The Receiver is authorized to make an interim distribution of up to
17 \$45,800,000 to claimants under the Distribution Plan with Allowed Claims.
- 18 4. The Receiver is authorized to set aside a reserve of \$16,500,000 for
19 taxes and administrative expenses in accordance with the Amended Distribution
20 Plan.

21
22 **SO ORDERED.**

23
24 Dated: _____

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

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PROOF OF SERVICE

Securities and Exchange Commission v. Steven Chen, USFIA, Inc., et al.,
USDC, Central District of California – Case No. 2:15-cv-07425-RGK-PLA

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 865 S. Figueroa Street, Suite 2800, Los Angeles, California 90017-2543.

On **April 22, 2022**, I caused to be served on all the parties to this action addressed as stated on the attached service list or as indicated below, the document entitled: **[PROPOSED] ORDER APPROVING RECEIVER’S AMENDED DISTRIBUTION PLAN**

OFFICE MAIL: By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with the firm's practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

OVERNIGHT DELIVERY: I deposited in a box or other facility regularly maintained by express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document(s) in sealed envelope(s) or package(s) designed by the express service carrier, addressed as indicated on the attached service list, with fees for overnight delivery paid or provided for.

HAND DELIVERY: I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

ELECTRONIC MAIL: By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

E-FILING: By causing the document to be electronically filed via the Court's CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

FAX: By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on **April 22, 2021** at Los Angeles, California.



Martha Diaz

SERVICE LIST

Securities and Exchange Commission v. Steven Chen, USFIA, Inc., et al.,
USDC, Central District of California – Case No. 2:15-cv-07425-RGK-PLA

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Internal Revenue Service
c/o Tracy. L. Wilkison
Acting United States Attorney
Scott M. Garringer
Asst United States Attorney
Chief, Criminal Division
Richard E. Robinson
Assistant United States Attorney
Major Frauds Section
1100 United States Courthouse
312 N. Spring Street
Los Angeles, CA 90012
213.894.0713 P | 213.894.6269
Email: richard.robinson@usdoj.gov

Via Certified Mail – Return Receipt

Internal Revenue Service
c/o Leonard Brown
Bankruptcy Specialist
300 N. Los Angeles St MS 5022
Los Angeles, CA 90012
213.372.4287 P | 855.863.4354 F

Via Fax

Leonard Brown
Bankruptcy Specialist
Internal Revenue Service
Insolvency Group 7
300 N. Los Angeles Street, 5022
Los Angeles, CA 90012

Via Certified Mail – Return Receipt

Ms. Evelyn Lopez
Internal Revenue Service
Centralized Insolvency Operations
PO Box 7346
Philadelphia, PA 19101-7346

Via U.S. First Class Mail

IRS Department of the Treasury
Internal Revenue Service
Ogden, UT 84201-0049

Via U.S. First Class Mail

IRS Department of the Treasury
Internal Revenue Service
Ogden, UT 84201-0038

Via U.S. First Class Mail

IRS Department of the Treasury
Internal Revenue Service
Ogden, UT 84201-0036

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Karl A. Racine
U.S. Attorney General
400 6th Street NW
Washington, DC 20001
202.727.3400 P | 202.347.8922 F
Email: oaq@dc.gov

Via Certified Mail – Return Receipt