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18 Attorneys for Receiver  
19 Thomas A. Seaman

20 UNITED STATES DISTRICT COURT  
21 CENTRAL DISTRICT OF CALIFORNIA  
22 WESTERN DIVISION

23 SECURITIES AND EXCHANGE  
24 COMMISSION,

25 Plaintiff,

26 v.

27 STEVE CHEN, USFIA, INC.,  
28 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

**NOTICE OF MOTION AND MOTION  
TO APPROVE RECEIVER'S  
DESTRUCTION OF DOCUMENTS AND  
RECORDS**

Date: March 27, 2023  
Time: 9:00 a.m.  
Ctrm: 850  
Judge Hon.R. Gary Klausner

1 **TO ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE THAT** on March 27, 2023 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 Receiver’s  
11 Destruction of Documents and Records (the “Motion”).

12 The Receiver met and conferred with the Securities and Exchange  
13 Commission prior to filing this Motion. The foundation and detailed basis for the  
14 Motion are set forth in the concurrently filed Memorandum of Points and  
15 Authorities, the supporting Declaration of Thomas A. Seaman and the documents  
16 and pleadings already on file in this action, and upon such further oral and  
17 documentary evidence as may be presented at time of hearing on the Motion.

18 **Procedural Requirements:** If you oppose this Motion, you are required to  
19 file your written opposition with the Office of the Clerk, United States District  
20 Court, 255 East Temple Street, Los Angeles, California 90012-3332, and serve the  
21 same on the undersigned not later than 21 days prior to the hearing.

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1 IF YOU FAIL TO FILE AND SERVE A WRITTEN OPPOSITION by the  
2 above date, the Court may grant the requested relief without further notice. This  
3 Motion is made following the conference of counsel pursuant to L.R. 7.3.  
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5 Dated: February 27, 2023

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

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8 By:           /s/ David R. Zaro          

9 DAVID R. ZARO  
10 Attorneys for Receiver  
11 Thomas A. Seaman  
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