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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  
AMENDED DISTRIBUTION PLAN  
RE: SECOND DISTRIBUTION**

Date: July 10, 2023  
Time: 9:00 a.m.  
Ctrm: 850  
Judge Hon. R. Gary Klausner

1           **TO ALL INTERESTED PARTIES:**

2           **PLEASE TAKE NOTICE THAT** on July 10, 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 Amended Distribution Plan Re: Second Distribution (the "Motion"). The Receiver  
12 seeks Court approval of Receiver Thomas A. Seaman's Amended Distribution Plan  
13 to implement those recommendations set forth in the Receiver's Response, Report  
14 and Recommendations For Concluding the Receivership [Doc. No. 503] (the  
15 "Receiver's Report") and specifically for approval to make a second distribution (the  
16 "Second Distribution") to those Claimants with Allowed Claims as provided herein.  
17 A true and correct copy of the Amended Distribution Plan is attached as Exhibit A  
18 to both the Declaration of Thomas A. Seaman and the [Proposed] Order Approving  
19 Receiver's Amended Distribution Plan, concurrently filed herewith.

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

27           **Procedural Requirements:** If you oppose this Motion, you are required to  
28 file your written opposition with the Office of the Clerk, United States District

1 Court, 255 East Temple Street, Los Angeles, California 90012-3332, and serve the  
2 same on the undersigned not later than 21 days prior to the hearing.

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

7 Dated: June 5, 2023

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

By:           /s/ David R. Zaro

DAVID R. ZARO  
Attorneys for Receiver  
Thomas A. Seaman

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