

1 DAVID R. ZARO (BAR NO. 124334)  
2 ALLEN MATKINS LECK GAMBLE  
3 MALLORY & NATSIS LLP  
4 865 South Figueroa Street, Suite 2800  
5 Los Angeles, California 90017-2543  
6 Phone: (213) 622-5555  
7 Fax: (213) 620-8816  
8 E-Mail: dzaro@allenmatkins.com

9 EDWARD G. FATES (BAR NO. 227809)  
10 ALLEN MATKINS LECK GAMBLE  
11 MALLORY & NATSIS LLP  
12 One America Plaza  
13 600 West Broadway, 27th Floor  
14 San Diego, California 92101-0903  
15 Phone: (619) 233-1155  
16 Fax: (619) 233-1158  
17 E-Mail: tfates@allenmatkins.com

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 RENEWED MOTION AND  
MOTION TO APPROVE RECEIVER'S  
AMENDED DISTRIBUTION PLAN  
RE: SECOND DISTRIBUTION**

Date: September 18, 2023  
Time: 9:00 a.m.  
Ctrm: 850  
Judge Hon. R. Gary Klausner

1           **TO ALL INTERESTED PARTIES:**

2           **PLEASE TAKE NOTICE THAT** on September 18, 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"), the Receiver shall move and hereby submits this Renewed  
11 Motion to Approve Receiver's Amended Distribution Plan Re: Second Distribution  
12 in accordance with the Court's Civil Minute order dated July 24, 2023. [Doc. No. 509.]  
13 (the "Renewed Motion").

14           The Receiver has provided additional notice to Claimants in an effort to make  
15 distributions to those with Allowed Claims who had not previously been located or who  
16 had otherwise not received their payments from the first distribution ("First Distribution")  
17 under the original Distribution Plan. Having completed the First Distribution, the Receiver  
18 is prepared to commence the second distribution to investors with Allowed Claims (the  
19 "Second Distribution") pursuant to the proposed Amended Plan of Receiver Thomas A.  
20 Seaman, (the "Amended Plan")

21           The Receiver seeks Court approval of Receiver Thomas A. Seaman's  
22 Amended Distribution Plan to implement those recommendations set forth in the  
23 Receiver's Response, Report and Recommendations For Concluding the  
24 Receivership [Doc. No. 503] (the "Receiver's Report") and specifically for approval  
25 to make a second distribution (the "Second Distribution") to those Claimants with  
26 Allowed Claims. A true and correct copy of the Amended Distribution Plan is  
27 attached as Exhibit A to the Declaration of Thomas A. Seaman and the [Proposed]  
28

1 Order Approving Receiver's Amended Distribution Plan, concurrently filed  
2 herewith.

3 The Receiver met and conferred with the Securities and Exchange  
4 Commission prior to filing this Renewed Motion. The foundation and detailed basis  
5 for the Renewed Motion and the Amended Distribution Plan are set forth in the  
6 Receiver's Report, Memorandum of Points and Authorities, the supporting  
7 Declaration of Thomas A. Seaman and the documents and pleadings already on file  
8 in this action, and upon such further oral and documentary evidence as may be  
9 presented at time of hearing on the Renewed Motion.

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

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

17  
18 Dated: August 17, 2023

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

19  
20  
21 By:           /s/ David R. Zaro          

DAVID R. ZARO  
Attorneys for Receiver  
Thomas A. Seaman