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18 Attorneys for Receiver
19 THOMAS A. SEAMAN

20 UNITED STATES DISTRICT COURT
21 EASTERN DISTRICT OF CALIFORNIA

22 SECURITIES AND EXCHANGE
23 COMMISSION,

24 Plaintiff,

25 v.

26 STEVE CHEN, USFIA, INC.,
27 ALLIANCE FINANCIAL GROUP,
28 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 RANCHO GOLF
COURSE, LLC,,

Defendants.

Action No. 2:15-CV-07425-RGK-PLA

**NOTICE OF MOTION AND
MOTION OF RECEIVER THOMAS
A. SEAMAN FOR ORDER:
(1) APPROVING FINAL REPORT
AND ACCOUNTING;
(2) AUTHORIZING PAYMENT OF
FINAL FEE APPLICATIONS OF
RECEIVER AND PROFESSIONALS;
(3) AUTHORIZING CORRECTIVE
DISTRIBUTIONS ON ALLOWED
CLAIMS;
(4) AUTHORIZING SUBMISSION OF
FINAL TAX RETURNS;
(5) AUTHORIZING
ABANDONMENT OR
DESTRUCTION OF RECORDS; AND
(6) CLOSING RECEIVERSHIP CASE
AND DISCHARGING RECEIVER**

Date: June 17, 2024
Time: 9:00 a.m.
Ctm: 850, 8th Floor

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** on June 17, 2024 at 9:00 a.m. in
3 courtroom 4 of the above-entitled Court located at 255 E. Temple Street, Los
4 Angeles, California, Thomas A. Seaman (the "Receiver"), the Court appointed
5 permanent Receiver for Defendants USFIA, Inc., Alliance Financial Group, Inc.,
6 Amauction, Inc., Aborell Mgmt I, LLC, Aborell Advisors I, LLC, Aborell REIT II,
7 LLC, Ahome Real Estate, LLC, Alliance NGN, Inc., Apollo REIT I, Inc., Apollo
8 REIT II, LLC, Amkey, Inc., US China Consultation Association, Quail Ranch Golf
9 Course, LLC, and their subsidiaries and affiliates (collectively, the "Receivership
10 Entities" or "Entities") will and hereby does move the Court for an order
11 (1) Approving Final Report and Accounting; (2) Authorizing Payment of Final Fee
12 Applications of Receiver and Professionals; (3) Authorizing Corrective
13 Distributions on Allowed Claims; (4) Authorizing Submission of Final Tax Returns;
14 (5) Authorizing Abandonment or Destruction of Records; and (6) Closing
15 Receivership Case and Discharging Receiver (the "Motion").

16 The Receiver has determined, in his reasonable business judgment, that each
17 of his responsibilities under this Court's October 6, 2015 Preliminary Injunction and
18 Orders (1) Freezing Assets; (2) Appointing A Permanent Receiver; (3) Prohibiting
19 Destruction of Documents; and (4) Requiring Accountings (ECF No. 14), have been
20 fulfilled or otherwise satisfied and the cost of continuing the receivership outweigh
21 any potential benefit. On that basis, the Receiver believes that it is appropriate to
22 conclude the receivership, pay outstanding professional and administrative fees and
23 expenses, terminate the receivership case, and discharge and release the Receiver.

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1 This Motion is based on this the concurrently filed Memorandum of Points
2 and Authorities, the Declaration of Thomas A. Seaman, the Receiver’s Final Report
3 and Accounting, the documents and pleadings already on file in this action, and such
4 further oral and documentary evidence as may be present at the time of the hearing.
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6 Dated: May 14, 2024

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

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9 By: /s/ David R. Zaro

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11 Attorneys for Receiver
12 THOMAS A. SEAMAN
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