

**BOUTIN GIBSON DI GIUSTO HODELL INC.**

Chris Gibson, SBN 073353  
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555 Capitol Mall, Suite 1500  
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**QUILLING, SELANDER, CUMMISKEY & LOWNDS, P.C.**

Michael J. Quilling (Tex. Bar No. 16432300) – Admitted Pro Hac Vice  
Brent J. Rodine (Tex. Bar No. 24048770) – Admitted Pro Hac Vice  
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Attorneys for Michael J. Quilling  
Receiver of Defendants Secure Investment Services, Inc.,  
American Financial Services, Inc., and Lyndon Group, Inc.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

SECURE INVESTMENT SERVICES, INC.,  
AMERICAN FINANCIAL SERVICES, INC.,  
LYNDON GROUP, INC., DONALD F.  
NEUHAUS, and KIMBERLY A. SNOWDEN,

Defendants.

Case No. 2:07-cv-01724 GEB CMK

NOTICE OF RECEIVER'S SIXTH  
MOTION FOR ORDER TO ALLOW  
"A" CLAIMS

Date: August 16, 2010  
Time: 9:00 a.m.  
Department: 10

TO: THE PARTIES AND ALL COUNSEL OF RECORD:

On August 16, 2010 at 9:00 a.m., or as soon thereafter as the matter may be heard before the Honorable Garland E. Burrell, Jr., at the U.S. District Court for the Eastern District of California, 501 I Street, Sacramento, California, Michael J. Quilling, the Receiver appointed in these proceedings ("Receiver"), will move this the Court to issue an order allowing 65 investor "A" Claims totaling \$2,018,613.14, pursuant to this Court's October 29, 2007 Order Granting Stipulated Motion to Establish Claim Procedure and to Approve Claim Form [Doc. No. 73].



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10 UNITED STATES DISTRICT COURT

11 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

12 SECURITIES AND EXCHANGE  
13 COMMISSION,

14 Plaintiff,

15 v.

16 SECURE INVESTMENT SERVICES, INC.,  
17 AMERICAN FINANCIAL SERVICES, INC.,  
LYNDON GROUP, INC., DONALD F.  
18 NEUHAUS, and KIMBERLY A. SNOWDEN,

19 Defendants.

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RECEIVER’S SIXTH MOTION FOR  
ORDER TO ALLOW “A” CLAIMS

Date: August 16, 2010  
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20 TO: THE PARTIES AND ALL COUNSEL OF RECORD:

21 COMES NOW, Michael J. Quilling, in his capacity as Receiver (“Receiver”), and files  
22 his Sixth Motion for Order to Allow “A” Claims. In support, the Receiver would respectfully  
23 show unto the Court as follows:

24 1. On October 29, 2007, the Court entered an Order [Doc. No. 73] establishing the  
25 claim procedures for this case. Among other things, the Court directed the Receiver to send  
26 claim forms to all persons or entities believed to be an investor with a potential claim against any  
27 of the corporate defendants.  
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1           2.       On February 5, 2008, the Court entered an Order allowing 41 investor “A” claims  
2 totaling \$1,441,155.00 [Doc. No. 107].

3           3.       On September 2, 2009, the Court entered an Order allowing 123 investor “A”  
4 claims totaling \$4,893,405.76 [Doc. No. 674].

5           4.       On November 5, 2009, the Court entered an Order allowing 159 investor “A”  
6 claims totaling \$5,980,206.69 [Doc. No. 691].

7           5.       On February 3, 2010, the Court entered an Order allowing 81 investor “A” claims  
8 totaling \$2,855,931.15 [Doc. No. 723].

9           6.       On May 12, 2010, the Court entered an Order allowing 79 investor “A” claims  
10 totaling \$3,485,577.72 [Doc. No. 734].

11          7.       On June 18, 2010, the Court entered an Order adjusting the net claim amount and  
12 allowing 91 investor “A” claims totaling \$2,829,634.94 [Doc. No. 752].

13          8.       Since his appointment as Receiver, a total of 800 claims against the receivership  
14 estate have been received. Of that total, 26 claims have been voluntarily withdrawn. Claim  
15 analysts have reviewed those claims and continue to contact investors in an effort to verify the  
16 allowed claim amounts.

17          9.       Since the last Order allowing claims, the Receiver has verified an additional 65  
18 investor “A” claims totaling \$2,018,613.14 as set out in Exhibit 1 attached hereto, and the  
19 Receiver now asks the Court to allow those claims against the receivership estate. Consistent  
20 with the Order of October 29, 2007 [Doc. No. 73], this Court should allow the claims listed on  
21 Exhibit 1 if no objection is lodged within thirty (30) days after the filing of this motion.

22          10.       The Receiver is still in the process of verifying other claims that will be addressed  
23 in future motions to be filed on a quarterly basis going forward.

24               WHEREFORE, PREMISES CONSIDERED, the Receiver prays that, upon final  
25 consideration of this motion, the Court enter an order allowing the 65 investor “A” claims set out  
26 in Exhibit 1 and for such other and further relief, general or special, at law or in equity, to which  
27 the Receiver may show himself justly entitled.

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Submitted this 13<sup>th</sup> day of July, 2010.

Respectfully submitted,

/s/ Michael J. Quilling  
MICHAEL J. QUILLING (Tex. Bar No. 16432300)  
BRENT J. RODINE (Tex. Bar No. 24048770)  
QUILLING, SELANDER, CUMMISKEY  
& LOWNDS, P.C.

Chris Gibson, SBN 073353  
Maralee MacDonald, SBN 208699  
BOUTIN GIBSON DI GIUSTO HODELL INC.  
Attorneys for Receiver

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13<sup>th</sup> day of July, 2010, a copy of this Motion was served on all interested parties through the Court's electronic filing system. In addition, a copy of this motion was served on the following other persons by First Class U.S. Mail:

Bazzle John Wilson  
1291 Nunneley Road  
Paradise, CA 95969

Ernest Jeremias  
5022 17th Avenue, Apt. 1  
Brooklyn, NY 11204

/s/ Maralee MacDonald  
Maralee MacDonald

## Exhibit 1 - Verified Investor "A" Claims

Claim #	Name	Company	NetClaim
SIA-00010	Eddie Martin		\$25,000.00
SIA-00030	Donald H Bell		\$16,710.00
SIA-00031	Donald H Bell		\$17,500.00
SIA-00032	Donald H Bell		\$25,000.00
SIA-00043	Stephen Frank		\$250,000.00
SIA-00079	Joseph F. Cawley		\$17,446.48
SIA-00080	William S Brister		\$45,000.00
SIA-00089	Kent Miller		\$17,500.00
SIA-00090	Kent Miller		\$20,710.00
SIA-00091	Kent Miller		\$17,865.00
SIA-00108	Kathleen R Bashaw		\$100,000.00
SIA-00116	Vonnie S & Jewell W Moore		\$35,000.00
SIA-00135	Patricia & Kent Huff		\$14,875.00
SIA-00143	Jerald Witten & Barbara Witten		\$20,000.00
SIA-00148	Jerry & Virginia Dent		\$26,400.00
SIA-00180	Kathie Steers		\$96,502.00
SIA-00192	Velva Jean Fischer		\$12,000.00
SIA-00195	Bradley & Laura Leichtfuss		\$2,418.20
SIA-00196	Bradley & Laura Leichtfuss		\$5,495.66
SIA-00197	Bradley & Laura Leichtfuss		\$8,267.86
SIA-00198	Bradley & Laura Leichtfuss		\$20,000.00
SIA-00199	Bradley & Laura Leichtfuss		\$54,000.00
SIA-00200	Bradley & Laura Leichtfuss		\$35,000.00
SIA-00203	Bradley G Leichtfuss		\$4,270.00
SIA-00210	Michael L Pagan		\$63,982.60
SIA-00230	Robert L & Janet M Shelsta		\$16,668.00
SIA-00237	Anthony H & JoAnne Rittimann		\$32,000.00
SIA-00269	Willard A Roesner Family Trust		\$25,000.00
SIA-00275	Jennifer Taylor & Robert Taylor		\$25,000.00
SIA-00309	Connie Westbrook		\$14,000.00
SIA-00310	Evelyn Hervey	c/o Connie Westbrook	\$15,580.00
SIA-00311	Thor Skonnord		\$100,000.00
SIA-00320	Patricia R Turner		\$5,000.00
SIA-00332	Wilburn & Florence Huff		\$20,600.00
SIA-00340	Edith L Williamson		\$20,000.00
SIA-00341	Jonathan Markowitz		\$76,000.00
SIA-00371	Duane D Marcum		\$50,000.00
SIA-00388	Iva M Bunge, TTEE	Bunge Revocable Trust	\$37,500.00
SIA-00390	Oggie Kim		\$100,000.00
SIA-00398	Nancy Escovedo		\$25,000.00
SIA-00399	William Vlcek		\$25,000.00
SIA-00418	Debra A Cannon		\$6,000.00
SIA-00456	Mark E Williams	Hattie May Williams Family Ltd Partnership	\$10,000.00
SIA-00462	Ray D Banda		\$10,000.00
SIA-00463	Ray D Banda		\$10,000.00
SIA-00464	Carol L (Erwin) Banda		\$25,000.00
SIA-00490	Esther Jordan	c/o Tom Mayberry	\$55,000.00
SIA-00548	Gary C Pickle		\$15,000.00
SIA-00554	Rakesh Joshi		\$12,882.16
SIA-00556	Carol L (Erwin) Banda		\$25,000.00
SIA-00635	Dana J. Dunn		\$42,170.19
SIA-00636	Timothy C. Dunn		\$30,829.81

<b>Claim #</b>	<b>Name</b>	<b>Company</b>	<b>NetClaim</b>
SIA-00638	BEB Enterprises (Bahorich and Cornett)	c/o Michael S Cornett	\$20,000.00
SIA-00647	Kirsti R. Edinburgh	c/o Joane Barbier	\$19,754.21
SIA-00669	Albert E. Wedworth		\$10,831.58
SIA-00725	Robert Winn		\$50,000.00
SIA-00789	Rakesh Joshi		\$10,000.00
SIA-00790	Rakesh Joshi		\$5,027.04
SIA-00791	Iva M Bunge, TTEE	Bunge Revocable Trust	\$40,000.00
SIA-00792	Kirsti R. Edinburgh	c/o Joane Barbier	\$2,827.35
SIA-00793	Larry & Marilyn Anderson		\$40,000.00
SIA-00794	Elaine Pierskalla		\$5,000.00
SIA-00795	Anna C. Skaggs	Estate of Robert Skaggs	\$5,000.00
SIA-00796	Eric W. Tucker		\$20,000.00
SIA-00797	James M Tucker		\$10,000.00
65 claims for			<b><u>\$2,018,613.14</u></b>