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9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA
11 SACRAMENTO DIVISION

12 SECURITIES AND EXCHANGE COMMISSION,

13 Plaintiff,

14 v.

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

18 Defendants.

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

STIPULATION AND ORDER
REGARDING PRELIMINARY
INJUNCTION

19 **BACKGROUND**

20 1. On August 23, 2007, Plaintiff Securities and Exchange Commission
21 (“Commission”) filed its Complaint and other papers in this matter seeking injunctive relief, the
22 appointment of a receiver, and other relief.

23 2. On August 24, 2007, the Court issued a Temporary Restraining Order and Order
24 to Show Cause Re Preliminary Injunction, and an Order Appointing Temporary Receiver. A
25 hearing on these matters is currently set for November 2.

26 3. On October 24, 2007, the Commission filed a Notice of Defendants’ Non-
27 Opposition, asking the Court to adopt the provisions of the Temporary Restraining Order as the
28 Court’s Order of Preliminary Injunction, pending trial or further orders. The Commission stated

1 in the notice that it hoped to soon file a stipulation with Defendant Donald F. Neuhaus regarding
2 modified asset freeze provisions.

3 **STIPULATION**

4 4. The Commission and Donald F. Neuhaus (“Neuhaus”) hereby stipulate that as
5 applied to Neuhaus and his wife, the terms of the Temporary Restraining Order remain in force
6 and effect pending trial or further court orders, except that excluded from the asset freeze
7 provisions of the Temporary Restraining Order are future Social Security payments and other
8 income that Neuhaus and/or his wife receive up to the combined total pre-tax amount of \$3,000
9 monthly.

10 5. By entering into this stipulation, Neuhaus does not admit any civil or criminal
11 liability.

12 Respectfully submitted,

13 SECURITIES AND EXCHANGE
14 COMMISSION

15 Dated: October 29, 2007

16 By /s/ Thomas J. Eme
17 Thomas J. Eme
18 John S. Yun
19 Attorneys for Plaintiff Securities
20 Exchange Commission

21 MOSS & LOCKE

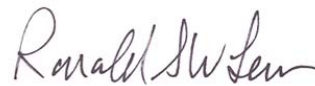
22 Dated: October 29, 2007

23 By /s/ Bruce Locke (as authorized on 10/29/07)
24 Bruce Locke
25 Attorneys for Defendant
26 Donald F. Neuhaus

27 **ORDER**

28 IT IS SO ORDERED.

SIGNED this 30th day of October, 2007.



Honorable Ronald S.W. Lew
Senior, United States District Judge