

**ZINK & LENZI
PROFIT SHARING PLAN**

REAL PARTY IN INTEREST
250 VALLOMBROSA AVE., STE. 175
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J.D. ZINK (SBN: 58726)
In Pro per

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

SECURITIES EXCHANGE COMMISSION, No. 2:07-cv-01724 GEB CMK
Plaintiff, OPPOSITION TO MOTION
FOR AUTHORIZATION TO
vs. ABANDON THE SHO-I(1)
POLICY
SECURE INVESTMENT SERVICES, INC. Date: 6-30-08
AMERICAN FINANCIAL SERVICES, INC. Time: 9:00 a.m.
LYNDON GROUP, INC., DONALD E. Courtroom 10
NEUHAUS, and KIMBERLY A. SNOWDEN,
Defendants.

MEMORANDUM OF POINTS AND AUTHORITIES
IN OPPOSITION TO MOTION FOR AUTHORIZATION TO
ABANDON THE SHO-I(1) POLICY

J. D. ZINK, a trustee of real party in interest Zink & Lenzi Profit Sharing Plan, an investor in the SHO-I(1) policy, appearing here in pro per, files this opposition to the motion of the receiver for authorization to abandon the SHO-I(1) policy:

1. I, J. D. ZINK, am an attorney at law licensed to practice in the State of California and in the United States

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SHO-i91) POLICY

District Court for the Eastern District of California, and I am a trustee in the Zink & Lenzi Profit Sharing Plan, holder of a 6.667% interest in the SHO-I(1) policy as set forth in Exhibit 3 attached to the receiver's motion on file herein. I am appearing in pro per for the real party in interest, Zink & Lenzi Profit Sharing Plan.

2. After reviewing the motion and the receiver's supporting papers, I see nowhere in that motion, a statement by the receiver, of the present value of the 1.5 million dollar life insurance policy that the receiver has designated the SHO-I(1) policy. Without knowing the value of the policy, there is no way that this court can determine whether or not the receiver's allegations are correct that "the out of pocket costs to the receiver is about to exceed the amount it will ever receive in death benefits." Without that information, this court is unable to determine whether or not it is more practical for the receiver to continue to borrow and pay the premiums to keep the policy in force and effect rather than abandon the policy.

3. Furthermore, no economic analysis has been provided by the receiver done by a CPA or other expert, indicating that it would not be prudent for the receiver to continue to pay the premiums and repay any monies borrowed to pay the premium out of the 1.5 million dollar policy once the insured passes away.

4. Last but certainly not least is the fact that the receiver has presented nothing to the court about the present

life expectancy of the insured in the Lincoln National Life Insurance Policy No. 7087159, Insured: Ida Shooster. As of 6/22/01 Amscott Medical Lab, Inc. did a life expectancy certificate stating that the date of birth was 5/23/18, age 83, sex female, with primary diagnosis thyroid nodule, mitral valve prolapse, hiatal hernia, bilateral cataracts, and S/P extraction. The review after that stated subject is an 83 year old female with mitral valve prolapse and thyroid nodule (suppression therapy). Given the age of subject, her medical records, and risk factors, life expectancy and information available would be 36 months. Signed Dr. Irene Shayn, M.D., FACP. A copy of this Life Expectancy Certificate is attached hereto as Exhibit 1. It would appear that the subject is now a little over 90 years old and may have even more health problems than she did seven years ago. For all we know, her life expectancy might not be more than a month or two and she could even be in intensive care and could go at any moment. Certainly this is information that the receiver should provide to support his motion when this much money for so many investors is so critically involved.

5. In paragraph 12 of it's motion, the receiver "requests the court schedule an evidentiary hearing to allow a complete record to be developed which justifies the action requested by the receiver and to allow interested investors who hold ownership interests in the policy to present their positions to the court." Real party in interest, Zink & Lenzi Profit Sharing Plan, concur in this request, and indicate that

the court should require the receiver to provide the
aforementioned economic evidence before reaching any
conclusion.

Wherefore, real party in interest, Zink & Lenzi
Profit Sharing Plan, requests that the court deny receiver's
motion to abandon the SHO-I(1) policy until such time as proof
has been provided to the court sufficient to justify such
action.

Respectfully submitted,

DATED: June _____, 2008

J. D. ZINK (CA Bar #58726)
In Pro Per for Real
Party in Interest, Zink
& Lenzi Profit Sharing
Plan

PROOF OF SERVICE BY MAIL - CCP 1013a, 2015.5

2 I am a resident of the County of Butte, State of
3 California. I am over the age of 18 years and not a part to
4 the within cause. My business address is 250 Vallombrosa Ave.,
5 Suite 175, Chico, California.

6 On June 10, 2008, I served the within OPPOSITION TO
7 MOTION FOR AUTHORIZATION TO ABANDON THE SHO-I(1) POLICY on the
8 parties below named in said cause by placing a true copy
9 thereof, enclosed in a sealed envelope, with postage thereon
10 fully prepaid, in the following manner:

11 x In the mailroom at my business address before
12 4:45 p.m., which is delivered by the mail clerk to the U. S.
13 Post Office in Chico, California,

14 SEE ATTACHED MAILING LIST

15 I declare under penalty of perjury under the laws of
16 the State of California that the foregoing is true and correct
17 and that this declaration was executed on _____,
18 2008 at Chico, California.

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21 KATHY BRADFORD _____

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OPPOSITION TO MOTION FOR
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SHO-i91) POLICY

BOUTON, BISON, DI GIUSTO, HODDELL, INC.
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Estate of Maxine Wood
c/o Lynette Wood
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Karl and Zelda Eckstein
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Robert Skaggs
1272 Vallombrosa Ave.
Chico, CA 95926

Elenore Kimball
c/o TEAL & MONTGOMERY
815 Fifth Street, Suite 200
Santa Rosa, CA 95402

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