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9 **UNITED STATES DISTRICT COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**
11 **SACRAMENTO DIVISION**
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15 SECURITIES AND EXCHANGE COMMISSION,)
16 vs.)
17 SECURE INVESTMENT SERVICES, INC.,)
AMERICAN FINANCIAL SERVICES, INC.,)
18 LYNDON GROUP, INC., DONALD F.)
NEUHAUS AND KIMBERLY A. SNOWDEN,)
19 Defendants.)
20 _____)
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Civil Action No.
2:07-CV-01724-GEB-CMK

PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION'S
DESIGNATION OF EXPERT
WITNESSES FOR ITS CASE IN
CHIEF

Date: August 18, 2009
Time: 9:00 a.m.
Courtroom: 10
Judge: Garland E. Burrell, Jr.

PLAINTIFF'S DESIGNATION OF EXPERT WITNESSES

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure, plaintiff Securities and Exchange Commission ("Commission") hereby designates the following persons to provide expert testimony as part of its case in chief for the liability trial against defendant Kimberly A. Snowden ("Snowden"). In making these designations, the Commission reserves the right to designate additional areas of expert testimony or additional experts for use in its rebuttal case.

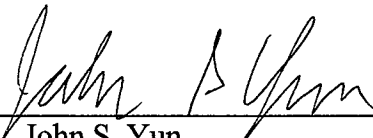
Milo H. Segner, Jr. Mr. Segner is a certified public accountant and the managing partner of the Litzler, Segner, Shaw & McKenney, LLP firm in Dallas, Texas. His address is 1412 Main Street, Suite 2400, Dallas, TX 75202, telephone: (214) 752-0999. Mr. Segner previously submitted an expert declaration in this matter as part of the Commission's request for a temporary restraining order, asset freeze and appointment of a receiver. Mr. Segner will provide expert testimony at trial regarding the subjects raised in his prior declaration and expert report including, but not limited to, the financial condition of Secure Investment Services, Inc. ("SIS") prior to the appointment of the receiver in August 2007, the receipt and disbursement of funds by SIS and its officers, the flow of funds through the SIS accounts, the manner in which the officers of SIS would have been aware of the firm's financial condition from the various accounting reports, journals, software programs and other documents that were available to them at the time, the receipt of funds by Snowden, the failure of SIS to establish any reserves for paying future premiums on the insurance policies that were sold to investors, and the transfer of funds from the Altrogge Policy investors to the Richter Policy investors by SIS and Snowden, as well as any other issues that become apparent prior to the completion of fact discovery. Mr. Segner's compensation is \$395 per hour.

Gerry H. Goldsholle. Mr. Goldsholle is the founder and chief executive officer of Advice Company, which is located at 2330 Marinship Way, Suite 120, P. O. Box 1739, Sausalito, CA 94966-1739, telephone: (415) 331-1212 ext. 234. Mr. Goldsholle previously submitted an expert declaration in this matter as part of the Commission's request for a temporary restraining order, asset freeze and appointment of a receiver. Pursuant to the agreement of counsel, Mr. Goldsholle's declaration will also serve as his expert report in this case. Mr. Goldsholle will provide expert testimony regarding the subjects raised in his prior declaration and expert report including, but not limited to, the operation of

1 insurance policies, the manner in which persons might purchase a life settlement investment, the
2 importance of paying the premium on policies, the character of "cash values" of insurance policies and
3 to whom they belong if there is a life settlement investment and the importance of life expectancy
4 estimates in acquiring policies, as well as any other issues that become apparent prior to the completion
5 of fact discovery. Mr. Goldsholle's compensation is \$375 per hour.

6 DATED: October 9, 2008

7 SECURITIES AND EXCHANGE COMMISSION
8 MARC J. FAGEL
9 JOHN S. YUN
10 THOMAS J. EME
11 LLOYD FARNHAM

12 By: 
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14 Attorneys for Plaintiff
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