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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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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

**RECEIVER'S FOURTH MOTION
TO TRANSFER INTERESTS IN AN
INSURANCE POLICY TO THE
RECEIVERSHIP**

Date: June 22, 2009
Time: 9:00 a.m.
Department 10

TO THE HONORABLE GARLAND E. BURRELL, JR., UNITED STATES DISTRICT JUDGE:

Michael J. Quilling, the Receiver appointed in these proceedings ("Receiver"), files this Fourth Motion to Transfer Interests in an Insurance Policy to the Receivership and, in support, would show the following:

1. By Orders dated August 24, 2007 [Dkt. No. 27], October 30, 2007 [Dkt. No. 80], and October 15, 2008 [Dkt. No. 326] this Court appointed the Receiver and charged him with having "complete and exclusive control, possession and custody of all receivership assets."

2. The principal assets at issue in this case are forty-four life insurance policies managed by the receivership entities.

1 3. Fifteen policies at issue in this case are referred to as “multiple-owner policies”
2 because numerous individual investors each hold a fractional ownership interest in them.
3 Typically, each owner in a multiple-owner policy also had a beneficiary interest equal to his or
4 her ownership percentage. The SHU-A&H(1) policy is one of these multiple-owner policies.

5 4. This motion addresses the transfer of some fractional ownership interests to the
6 Receiver. For the last year, the Receiver has contacted investors in the SHU-A&H(1) policy
7 asking them to transfer their ownership interests in exchange for a claim against the receivership
8 estate. Nine of the sixteen fractional owners in the SHU-A&H(1) policy have signed forms
9 transferring their interests to the Receiver. The Receiver submitted those transfer forms to Sun
10 Life. Sun Life responded that it could not transfer ownership interests in the policy without
11 written consent from all of the other owners. A true and correct copy of Sun Life’s letter is
12 attached as Exhibit 1 and incorporated for all purposes.

13 5. Throughout this case, some insurance providers have refused to honor transfers
14 without such written consent. In each case, the Receiver filed motions [Dkt. Nos. 250, 425, 451]
15 and the Court entered orders [Dkt. Nos. 278, 471, 472] directing those providers to execute the
16 transfers without the written consent of other owners. The Receiver now asks the Court to
17 provide the same relief here.

18 6. The Court should enter an order directing Sun Life to accept and process all
19 requests to transfer ownership and/or beneficiary interests to the Receiver without the written
20 consent of other owners or third parties. The Receiver submits that the other owners do not have
21 a legitimate reason to oppose this motion because none have a claim to the fractional ownership
22 or beneficiary interests at issue and because this motion does not seek to change, modify, or
23 otherwise alter their ownership or beneficiary interest in the policy. Furthermore, this order
24 would serve the receivership’s best interests because it increases receivership assets without
25 spending the time and money needed to obtain written consent from all sixteen owners. In fact,
26 this Court has already determined that such relief is warranted and in the receivership estate’s
27 best interest in similar situations. *See* Orders [Dkt. Nos. 278, 471, 472].

CERTIFICATE OF SERVICE ON POLICY OWNERS

I hereby certify that on the 21st day of May, 2009, a copy of this Notice was served on all interested parties through the Court's electronic filing system. In addition, a copy of this motion was served by U.S. First Class Mail, on the following investors named as owners of the SHU-A&H(1) Policy at their last known addresses

Stephen C. Andrews
22338 Regnart Road
Cupertino, CA 95014

Susan Andrews
22338 Regnart Road
Cupertino, CA 95014

Jeanne D. Baldwin
4007 299th Place SW
Mountlake Terrace, WA
98043

The Bowser Family Trust
1960 E. 32nd St. Apt. 40
Yuma, CA 85365

Roslyn Bradshaw
5648 DeeDee Avenue
Citrus Heights, CA 95610

Wanda Gardner
1119 Ravine View Drive
Roseville, CA 956661

Jane and Kenneth Melville
10327 Juniper Creek Lane
Las Vegas, NV 89145

Seadra A. Nodland
711 Alamine Drive
Redding, CA 96003

Steve Ormbrek
466 Greenleaf Court
Goleta, CA 93117

Michael Pagan
7725 Tobia Way
Fair Oaks, CA 95928

Gerald T. Peavy
2111 Algonklin
Chico, CA 95926

Rose Ramirez
2680 Madrone Street
Sutter, CA 95982

Steven L. Riley
451 Turquoise Court
Redding, CA 96003

Marilyn S. Stratz
522 Tornwood Court
Los Altos, CA 94022

Vernon W. Wederbrook
16139 Lower Springs Road
Redding, CA 96001

/s/ Michael J. Quilling

Michael J. Quilling

Exhibit “1”



Sun Life Assurance
 Company of Canada
 P.O. Box 9106
 Wellesley Hills, MA 02481-9106
 1-800-SUN-LIFE

May 18, 2009

VIA FACSIMILE & U.S. MAIL

Michael Quilling
 Quilling, Selander, Cummiskey & Lownds
 2001 Bryan Street, Suite 1800
 Dallas, TX 75201

Re: Policy Numbers: 020070476
 Life Insured: SHU-A&H(1)

Dear Mr. Quilling:

We write in response to your letter dated April 17, 2009. In that letter, you request that the ownership interests of seven individuals in the above-referenced policy be transferred to you in your capacity as receiver appointed in the matter captioned *Securities and Exch. Comm'n v. Secure Inv. Servs., Inc. et al.*, Case No. C2:07-CV-01724 LEW-CMK pending in the United States District Court for the Eastern District of California.

By letter of July 17, 2008 Sun Life's counsel confirmed that the above-referenced policy was jointly owned and provided Sun Life's most current contact information for each joint owner. Sun Life's records indicated the following sixteen joint owners of Policy No. 020070476:

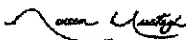
NAME	ADDRESS	PERCENTAGE
American Financial Services, Inc Michael Quilling, Receiver	2001 Bryan Street, Suite 1800 Dallas, TX 75201	9.189459
Stephen C. Andrews	22338 Regnart Road Cupertino, CA 95014	18.0%
Susan Andrews	22338 Regnart Road Cupertino, CA 95014	13.5%
Jeanne D. Baldwin	2770 Highland Bluff Drive Red Bluff, CA 96080	4.01238%
Bowser Family Revocable Trust, dated November 4, 2004	21175 Wilcox Red Bluff, CA 96080	1.6%

NAME	ADDRESS	PERCENTAGE
Richard Bowser & Linda Williams Bowser, Trustees		
Rosslyn Bradshaw	5648 DeeDee Ave Citrus Heights, CA 95610	2.217177%
Wanda Gardner	1119 Ravine View Drive Roseville, CA 95661	4.281709%
Jane & Kenneth Melville	10327 Juniper Creek Lane Las Vegas, NV 89145	1.6%
Saedra A. Nodland	PO Box 102 Millville, CA 96062	0.32%
Steve Ormbrek	4692 Carpinteria Ave # 39 Carpentaria, CA 93013	1.6%
Michael Pagan	7725 Tobia Way Fair Oaks, CA 95928	8.567991%
Gerald T. Peavy	2111 Algonklin Chico, CA 95926	2.038671%
Rose Ramirez	2680 Madrone Street Sutter, CA 95982	12.872613%
Steven L. Riley	451 Turquoise Ct Redding, CA 96003	4.8%
Marilyn S. Stratz	522 Torwood Ct Los Altos, CA 94022	9.0%
Vernon W. Wederbrook	16139 Lower Springs Rd Redding, CA 96001	6.4%

We renew our request that you treat the ownership information described herein as confidential. The ownership information has been disclosed to you in your capacity as the court appointed receiver.

In order for Sun Life to transfer additional ownership interests to you in your capacity as receiver, it must receive signed Ownership Change Requests from each of the sixteen joint owners of the above-referenced policy. As such, Sun Life is not presently in a position to transfer the ownership interests of the seven individuals identified in your correspondence, and who also provided Ownership Change Requests, until such time as all joint owners submit Ownership Change Requests. If the remaining nine joint owners are not transferring their ownership to you in your capacity as receiver, their Ownership Change Requests should indicate that they consent to the transfers of ownership by the other joint owners. At that time, Sun Life will be in a position to effectuate the transfers of ownership requested.

Sincerely,



Noreen Murtagh
Senior Manager – Life Operations

Exhibit “2”

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

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SECURITIES AND EXCHANGE
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SECURE INVESTMENT SERVICES, INC.,
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LYNDON GROUP, INC., DONALD F.
NEUHAUS, and KIMBERLY A. SNOWDEN,

Defendants.

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

**[PROPOSED] ORDER GRANTING
RECEIVER'S FOURTH MOTION
TO TRANSFER INTERESTS IN AN
INSURANCE POLICY TO THE
RECEIVERSHIP**

This matter comes before the Court on Receiver Michael J. Quilling's Fourth Motion to Transfer Interests in an Insurance Policy to the Receivership. The Court, having considered the motion, the attached exhibits, the pleadings on file, and finding good cause therefore, determines that the motion should be granted.

IT IS ORDERED, ADJUDGED, AND DECREED that Sun Life Financial ("Sun Life") shall accept and process all requests to transfer ownership interests and/or beneficiary interests to the Receiver without the written consent of other owners or third parties. This order specifically applies to any requests to transfer fractional ownership interests in Policy No. 20070476, which the Receiver refers to in these proceedings as the SHU-A&H(1) policy.

SIGNED this _____ day of _____, 2009.

UNITED STATES DISTRICT JUDGE
HONORABLE GARLAND E. BURRELL, JR.