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

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12 SECURITIES AND EXCHANGE COMMISSION,

13 Plaintiff,

14 v.

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

18 Defendants.

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

STIPULATION AND [PROPOSED]
ORDER REGARDING DISMISSAL
OF CLAIMS AGAINST CORPORATE
DEFENDANTS

19 **STIPULATION**

20 On January 10, 2008, the Court entered an agreed judgment permanently enjoining
21 Defendants Secure Investment Services, Inc., American Financial Services, Inc., and Lyndon
22 Group, Inc. (collectively “the corporate defendants”) from violations of certain provisions of the
23 federal securities laws.

24 Plaintiff Securities and Exchange Commission (“Commission”) is now withdrawing its
25 requests for disgorgement with prejudgment interest and civil money penalties against the
26 corporate defendants, which are in receivership. The Commission and the corporate defendants
27 therefore agree to the Court’s entering an order dismissing with prejudice the Commission’s
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1 claims for disgorgement with prejudgment interest and civil money penalties against the
2 corporate defendants.

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Dated: September 14, 2009

/s/ Thomas J. Eme
THOMAS J. EME
One of the attorneys for Plaintiff
SECURITIES AND EXCHANGE COMMISSION

Dated: September 14, 2009

/s/ Michael J. Quilling
(as authorized on Sept. 11, 2009)
MICHAEL J. QUILLING
Receiver for Secure Investment Services, Inc.,
American Financial Services, Inc., and Lyndon
Group, Inc.

ORDER

IT IS SO ORDERED.

SIGNED this _____ day of _____, 2009.

Honorable Garland E. Burrell, Jr.
United States District Judge