

BOUTIN GIBSON DI GIUSTO HODELL INC.

Chris Gibson, SBN 073353
Maralee MacDonald, SBN 208699
555 Capitol Mall, Suite 1500
Sacramento, California 95814-4603
Tel. (916) 321-4444

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
2001 Bryan Street, Suite 1800
Dallas, Texas 75201
Telephone: (214) 871-2100
Facsimile: (214) 871-2111

Attorneys for Michael J. Quilling
Receiver of Defendants Secure Investment Services, Inc.,
American Financial Services, Inc., and Lyndon Group, Inc.

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 FOR
ORDER TO ALLOW “A” CLAIMS

Date: February 8, 2010
Time: 9:00 a.m.
Department: 10

TO: THE PARTIES AND ALL COUNSEL OF RECORD:

COMES NOW, Michael J. Quilling, in his capacity as Receiver (“Receiver”), and files his Fourth Motion for Order to Allow “A” Claims. In support, the Receiver would respectfully show unto the Court as follows:

1. On October 29, 2007, the Court entered an Order [Doc. No. 73] establishing the claim procedures for this case. Among other things, the Court directed the Receiver to send claim forms to all persons or entities believed to be an investor with a potential claim against any of the corporate defendants.

1 2. On February 5, 2008, the Court entered an Order allowing 41 investor “A” claims
2 totaling \$1,441,155.00 [Doc. No. 107].

3 3. On September 2, 2009, the Court entered an Order allowing 123 investor “A”
4 claims totaling \$4,893,405.76 [Doc. No. 674].

5 4. On November 5, 2009, the Court entered an Order allowing 159 investor “A”
6 claims totaling \$5,980,206.69 [Doc. No. 691].

7 5. Since his appointment as Receiver, a total of 786 claims against the receivership
8 estate have been received. Claim analysts have reviewed those claims and continue to contact
9 investors in an effort to verify the allowed claim amounts.

10 6. Since the last Order allowing claims, the Receiver has verified an additional 81
11 investor “A” claims totaling \$2,855,931.15 as set out in Exhibit 1 attached hereto, and the
12 Receiver now asks the Court to allow those claims against the receivership estate. Consistent
13 with the Order of October 29, 2007 [Doc. No. 73], this Court should allow the claims listed on
14 Exhibit 1 if no objection is lodged within thirty (30) days after the filing of this motion.

15 7. The Receiver is still in the process of verifying other claims that will be addressed
16 in future motions to be filed on a quarterly basis going forward.

17 WHEREFORE, PREMISES CONSIDERED, the Receiver prays that, upon final
18 consideration of this motion, the Court enter an order allowing the 81 investor “A” claims set out
19 in Exhibit 1 and for such other and further relief, general or special, at law or in equity, to which
20 the Receiver may show himself justly entitled.

21 Submitted this 7th day of January, 2010.
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

/s/ Michael J. Quilling
MICHAEL J. QUILLING (Tex. Bar No. 16432300)
BRENT J. RODINE (Tex. Bar No. 24048770)
QUILLING, SELANDER, CUMMISKEY
& LOWNDS, P.C.

Chris Gibson, SBN 073353
Maralee MacDonald, SBN 208699
BOUTIN GIBSON DI GIUSTO HODELL INC.
Attorneys for Receiver

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of January, 2010, a copy of this Motion was served on all interested parties through the Court's electronic filing system. In addition, a copy of this motion was served on the following other persons by First Class U.S. Mail:

Bazzle John Wilson
1291 Nunneley Road
Paradise, CA 95969

Ernest Jeremias
5022 17th Avenue, Apt. 1
Brooklyn, NY 11204

/s/ Maralee MacDonald
Maralee MacDonald

Exhibit “1”

Case No. 2:07-cv-01724 GEB CMK; Securities and Exchange Commission v. Secure Investment Services, Inc. American Financial Services, Inc., Lyndon Group, Inc., Donald F. Neuhaus, and Kimberly A. Snowden

Exhibit 1 - Verified Investor "A" Claims

Claim #	Name	Company	NetClaim
SIA-00011	Larry D. Good		\$ 50,000.00
SIA-00020	Walter Larry Anderson, TTEE	The Anderson Family Trust	\$ 5,000.00
SIA-00027	Marc Bourreli		\$ 30,000.00
SIA-00033	Janis Grady		\$ 10,000.00
SIA-00034	Wayne Carroll		\$ 7,279.05
SIA-00059	Lois M Siler		\$ 50,000.00
SIA-00071	Archie & Elrine Schmidt		\$ 75,000.00
SIA-00073	Jack J. Hsu		\$ 10,000.00
SIA-00082	Patrick T. Kittle		\$ 20,000.00
SIA-00083	Robert & Debbie Towne		\$ 5,000.00
SIA-00086	Drew Zidzik		\$ 20,000.00
SIA-00095	The Joseph Trust (Turner)	Anita R. Smith, TTEE	\$ 50,000.00
SIA-00111	Robert C & Linda F Driscoll		\$ 25,000.00
SIA-00119	Charles A Honnold III	c/o Stephen F Yunker, Esq	\$ 370,000.00
SIA-00124	Cheryl Reager		\$ 25,000.00
SIA-00146	James & Kimberly Humble		\$ 14,000.00
SIA-00171	Gilman Goodrich		\$ 46,000.00
SIA-00185	Jennifer C Stalder		\$ 50,000.00
SIA-00190	Cynthia Aab		\$ 10,000.00
SIA-00222	Ronald L Bunting		\$ 100,000.00
SIA-00223	Ronald L Bunting		\$ 40,000.00
SIA-00224	Ronald L Bunting		\$ 49,000.00
SIA-00257	James D Oliver		\$ 22,174.28
SIA-00258	James D Oliver		\$ 100,000.00
SIA-00259	James D Oliver		\$ 50,000.00
SIA-00299	Laurence & Janice Gilmer		\$ 10,477.00
SIA-00300	Laurence & Janice Gilmer		\$ 26,668.00
SIA-00301	Laurence & Janice Gilmer		\$ 22,800.00
SIA-00302	Janice Gilmer	Laurence Gilmer	\$ 23,010.15
SIA-00303	Laurence Gilmer		\$ 5,500.00
SIA-00304	Laurence Gilmer		\$ 5,000.00
SIA-00342	Jonathan Markowitz		\$ 13,000.00
SIA-00343	Jonathan Markowitz		\$ 16,000.00
SIA-00377	Michael A Lovay		\$ 24,500.00
SIA-00383	Robert D Miller		\$ 25,000.00
SIA-00397	Charles M & Sherrie E Coil		\$ 5,000.00
SIA-00409	Kathleen Hammond		\$ 5,000.00
SIA-00410	Randall M Hammond		\$ 81,095.51
SIA-00412	Lynette A Wood		\$ 5,000.00
SIA-00413	Estate of Maxine C Wood	c/o Lynette Wood, TTEE	\$ 5,000.00
SIA-00424	Mike G O'Campo		\$ 20,891.00
SIA-00426	Terry M Matheny		\$ 7,551.50
SIA-00427	Carolyn S Matheny		\$ 29,271.07
SIA-00428	Terry M & Carolyn S Matheny		\$ 35,000.00
SIA-00429	Terry M & Carolyn S Matheny		\$ 50,000.00
SIA-00430	Terry M & Carolyn S Matheny		\$ 13,500.00
SIA-00431	Terry M & Carolyn S Matheny		\$ 38,000.00
SIA-00432	Philip G & Victoria B Roth		\$ 5,000.00

Case No. 2:07-cv-01724 GEB CMK; Securities and Exchange Commission v. Secure Investment Services, Inc. American Financial Services, Inc., Lyndon Group, Inc., Donald F. Neuhaus, and Kimberly A. Snowden

Claim #	Name	Company	NetClaim
SIA-00437	Mary V Behnke	c/o Sandra Nordquist	\$ 20,000.00
SIA-00441	Lauline A Perrin		\$ 15,600.00
SIA-00442	Lauline A Perrin		\$ 15,000.00
SIA-00443	Mike A Angell		\$ 10,000.00
SIA-00444	William E Thornton		\$ 40,000.00
SIA-00450	Audrey E Schmidt		\$ 22,577.67
SIA-00451	Angie Castillo		\$ 12,500.00
SIA-00535	Thomas & Corina Heier		\$ 42,000.00
SIA-00594	Richard W Anderson		\$ 48,959.00
SIA-00613	Herman S. Holzmilller, Deceased		\$ 68,542.00
SIA-00644	Marion Fihn, TTEE	Fihn Separate Property Trust	\$ 68,400.00
SIA-00699	Vicki F. Paulus		\$ 25,000.00
SIA-00700	Vicki F. Paulus		\$ 50,000.00
SIA-00701	Marc & Sherry A. Wilson		\$ 7,500.00
SIA-00702	Marc & Sherry A. Wilson		\$ 25,000.00
SIA-00703	Marc & Sherry A. Wilson		\$ 15,000.00
SIA-00707	Mary Ann Martin		\$ 15,000.00
SIA-00708	Mary Ann Martin		\$ 15,000.00
SIA-00709	Mary Ann Martin		\$ 2,243.93
SIA-00710	Mary Ann Martin		\$ 10,000.00
SIA-00711	Michael J. & Kathryn Quirke		\$ 5,000.00
SIA-00714	Robin W. Shields		\$ 22,957.45
SIA-00715	Henry & Yoshie Hockl		\$ 30,000.00
SIA-00716	Henry & Yoshie Hockl		\$ 30,000.00
SIA-00720	Roman Paulus		\$ 107,933.54
SIA-00722	David K. Spring		\$ 6,000.00
SIA-00723	Stephen C. Andrews		\$ 100,000.00
SIA-00724	Susan C Andrews		\$ 75,000.00
SIA-00728	Susan C Andrews		\$ 150,000.00
SIA-00749	Traci Elling (Cooper)		\$ 10,000.00
SIA-00750	Steve Johnson		\$ 20,000.00
SIA-00765	Marion Fihn, TTEE	Fihn Separate Property Trust	\$ 45,000.00
SIA-00779	Arlene M. Jenkins		\$ 20,000.00
			81 claims for <u>\$ 2,855,931.15</u>