

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

**NOTICE OF RECEIVER’S SIXTH
MOTION FOR ORDER TO ALLOW
“A” CLAIMS**

Date: August 16, 2010
Time: 9:00 a.m.
Department: 10

TO: THE PARTIES AND ALL COUNSEL OF RECORD:

On August 16, 2010 at 9:00 a.m., or as soon thereafter as the matter may be heard before the Honorable Garland E. Burrell, Jr., at the U.S. District Court for the Eastern District of California, 501 I Street, Sacramento, California, Michael J. Quilling, the Receiver appointed in these proceedings (“Receiver”), will move this the Court to issue an order allowing 65 investor “A” Claims totaling \$2,018,613.14, pursuant to this Court’s October 29, 2007 Order Granting Stipulated Motion to Establish Claim Procedure and to Approve Claim Form [Doc. No. 73].

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RECEIVER’S SIXTH MOTION FOR
ORDER TO ALLOW “A” CLAIMS

Date: August 16, 2010
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TO: THE PARTIES AND ALL COUNSEL OF RECORD:

COMES NOW, Michael J. Quilling, in his capacity as Receiver (“Receiver”), and files his Sixth 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. On February 3, 2010, the Court entered an Order allowing 81 investor “A” claims
8 totaling \$2,855,931.15 [Doc. No. 723].

9 6. On May 12, 2010, the Court entered an Order allowing 79 investor “A” claims
10 totaling \$3,485,577.72 [Doc. No. 734].

11 7. On June 18, 2010, the Court entered an Order adjusting the net claim amount and
12 allowing 91 investor “A” claims totaling \$2,829,634.94 [Doc. No. 752].

13 8. Since his appointment as Receiver, a total of 800 claims against the receivership
14 estate have been received. Of that total, 26 claims have been voluntarily withdrawn. Claim
15 analysts have reviewed those claims and continue to contact investors in an effort to verify the
16 allowed claim amounts.

17 9. Since the last Order allowing claims, the Receiver has verified an additional 65
18 investor “A” claims totaling \$2,018,613.14 as set out in Exhibit 1 attached hereto, and the
19 Receiver now asks the Court to allow those claims against the receivership estate. Consistent
20 with the Order of October 29, 2007 [Doc. No. 73], this Court should allow the claims listed on
21 Exhibit 1 if no objection is lodged within thirty (30) days after the filing of this motion.

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

24 WHEREFORE, PREMISES CONSIDERED, the Receiver prays that, upon final
25 consideration of this motion, the Court enter an order allowing the 65 investor “A” claims set out
26 in Exhibit 1 and for such other and further relief, general or special, at law or in equity, to which
27 the Receiver may show himself justly entitled.
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Submitted this 13th day of July, 2010.

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 13th day of July, 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