

**BOUTIN JONES INC.**  
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Maralee MacDonald, SBN 208699  
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**QUILLING, SELANDER, CUMMISKEY & LOWNDS, P.C.**  
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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 SEVENTH  
MOTION FOR ORDER TO ALLOW  
“A” CLAIMS

Date: January 24, 2011  
Time: 9:00 a.m.  
Department: 10

TO: THE PARTIES AND ALL COUNSEL OF RECORD:

On January 24, 2011 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 22 investor “A” Claims totaling \$794,757.41, pursuant to this Court’s October 29, 2007 Order Granting Stipulated Motion to Establish Claim Procedure and to Approve Claim Form [Doc. No. 73].

The motion will be based upon Receiver’s Motion and points and authorities submitted contemporaneously, the papers on file in this matter, and any testimony or argument received by

1 the Court during the hearing on the motion. A proposed order is also submitted  
2 contemporaneously with this motion.

3 Respectfully submitted,

4 BOUTIN JONES INC.

5  
6 Dated: December 2, 2010.

7 By           /s/ Maralee MacDonald            
8 Maralee MacDonald  
9 Attorneys for Receiver of Defendants  
10 Secure Investment Services, Inc.,  
11 American Financial Services, Inc., and  
12 Lyndon Group, Inc.

13  
14  
15 **CERTIFICATE OF SERVICE**

16 I hereby certify that on the 2<sup>nd</sup> day of December, 2010, a copy of this Motion was served  
17 on all interested parties through the Court's electronic filing system. In addition, a copy of this  
18 motion was served on the following other persons by First Class U.S. Mail:

19 Bazzle John Wilson  
20 1291 Nunneley Road  
21 Paradise, CA 95969

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

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28  
          /s/ Maralee MacDonald            
Maralee MacDonald

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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 Seventh 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.       On August 13, 2010, the Court entered an Order adjusting the net claim amount  
14 and allowing 10 investor “A” claims totaling \$391,990.00 and amending 3 previously allowed  
15 claims totaling \$45,000.00. [Doc. No. 776].

16          9.       On August 13, 2010, the Court entered an Order allowing 65 investor “A” claims  
17 totaling \$2,018,613.14. [Doc. No. 778].

18          10.       Since his appointment as Receiver, a total of 804 claims against the receivership  
19 estate have been received. Of that total, 26 claims have been voluntarily withdrawn. Claim  
20 analysts have reviewed those claims and continue to contact investors in an effort to verify the  
21 allowed claim amounts.

22          11.       Since the last Order allowing claims, the Receiver has verified an additional 22  
23 investor “A” claims totaling \$794,757.41 as set out in Exhibit 1 attached hereto, and the Receiver  
24 now asks the Court to allow those claims against the receivership estate. Consistent with the  
25 Order of October 29, 2007 [Doc. No. 73], this Court should allow the claims listed on Exhibit 1  
26 if no objection is lodged within thirty (30) days after the filing of this motion.  
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