

1 DAVID R. ZARO (BAR NO. 124334)
 JOSHUA A. DEL CASTILLO (BAR NO. 239015)
 2 KENYON HARBISON (BAR NO. 260416)
 ALLEN MATKINS LECK GAMBLE
 3 MALLORY & NATSIS LLP
 515 South Figueroa Street, Ninth Floor
 4 Los Angeles, California 90071-3309
 Phone: (213) 622-5555
 5 Fax: (213) 620-8816
 E-Mail: dzaro@allenmatkins.com
 6 jdelcastillo@allenmatkins.com
 kharbison@allenmatkins.com

7 Attorneys for Receiver
 8 STEPHEN J. DONELL

9 UNITED STATES DISTRICT COURT
 10 CENTRAL DISTRICT OF CALIFORNIA

11
 12 SECURITIES AND EXCHANGE
 COMMISSION,

13 Plaintiff,

14 v.

15 ROBERT YANG, et al.
 16 Defendants,

17 AND

18 YANROB'S MEDICAL, INC., et al.
 Relief Defendants,.

Case No. 5:15-cv-02387-SVW (KKx)

PROOF OF SERVICE OF:
 1) NOTICE OF MOTION AND MOTION
 OF RECEIVER, STEPHEN J. DONELL,
 FOR AUTHORITY TO ABANDON A
 CONTRACT;
 2) MEMORANDUM OF POINTS AND
 AUTHORITIES;
 3) DECLARATION OF STEPHEN J.
 DONELL; and
 4) [PROPOSED] ORDER

Date: June 27, 2016
 Time: 1:30 p.m.
 Ctrm: 6
 Judge: Stephen V. Wilson

19
 20
 21
 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

PROOF OF SERVICE

Securities and Exchange Commission v. Robert Yang, Suncor Fontana, et al.
USDC, Central District of California – Case No. 5:15-cv-02387-SVW (KKx)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) and am not a party to this action. My business address is 515 South Figueroa Street, Ninth Floor, Los Angeles, California 90071-3309.

On May 27, 2016, I served the within document(s) described as:

- 1) NOTICE OF MOTION AND MOTION OF RECEIVER, STEPHEN J. DONELL, FOR AUTHORITY TO ABANDON A CONTRACT;
- 2) MEMORANDUM OF POINTS AND AUTHORITIES;
- 3) DECLARATION OF STEPHEN J. DONELL; and
- 4) [PROPOSED] ORDER

on the interested parties in this action as stated below:

Gary Hester
Lafferty Communities
8213 White Oak Avenue
Rancho Cucamonga, CA 91730

Served via Federal Express

BY OVERNIGHT DELIVERY: I deposited in a box or other facility regularly maintained by FedEx, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document(s) in sealed envelopes or packages designated by the express service carrier, addressed as indicated above on the above-mentioned date, with fees for overnight delivery paid or provided for.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 27, 2016, at Los Angeles, California.

Michael M. Mason

(Type or print name)



(Signature of Declarant)

EXHIBIT 1

1 ZACHARY T. CARLYLE
LESLIE J. HUGHES
2 Admitted *pro hac vice*
CarlyleZ@sec.gov
3 HughesLJ@sec.gov
SECURITIES AND EXCHANGE COMMISSION
4 Byron G. Rogers Federal Building
1961 Stout Street, Suite 1700
5 Denver, Colorado 80294-1961
Telephone: (303) 844-1000
6 Facsimile: (303) 297-3529

7 LOCAL COUNSEL:
David J. VanHavermaat, Cal. Bar No. 175761
8 VanhavermaatD@sec.gov
SECURITIES AND EXCHANGE COMMISSION
9 444 S. Flower Street, Suite 900
Los Angeles, California 90071
10 Telephone: (323) 965-3213
11 Facsimile: (213) 443-1904

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 SECURITIES AND EXCHANGE
15 COMMISSION,
Plaintiff,

16 vs.

17 ROBERT YANG,
18 CLAUDIA KANO,
19 SUNCOR FONTANA, LLC,
20 SUNCOR HESPERIA, LLC, AND
SUNCOR CARE LYNWOOD, LLC
21 Defendants,

22 AND

23 YANROB'S MEDICAL, INC.,
24 HEALTHPRO CAPITAL PARTNERS, LLC,
AND SUNCOR CARE, INC.
25 Relief Defendants.

Case No. 5:15-cv-02387-SVW (KKx)

CONSENT OF DEFENDANT
SUNCOR FONTANA, LLC

26
27
28

1 1. Defendant Suncor Fontana, LLC ("Defendant") acknowledges having
2 been served with the complaint in this action and having entered a general
3 appearance, and admits the Court's jurisdiction over Defendant and over the subject
4 matter of this action.

5 2. Without admitting or denying the allegations of the complaint (except as
6 provided as to personal and subject matter jurisdiction, which Defendant admits),
7 Defendant hereby consents to the entry of the Judgment in the form attached hereto
8 (the "Judgment") and incorporated by reference herein, which, among other things:

- 9 (a) permanently restrains and enjoins Defendant from violation of
10 Section 17(a) of the Securities Act of 1933 ("Securities Act") [15
11 U.S.C. § 77q(a)], Section 10(b) of the Securities Exchange Act of
12 1934 ("Exchange Act") and Rule 10b-5 thereunder [15 U.S.C. §
13 78j(b) and 17 C.F.R. § 240.10b-5].

14 3. Defendant agrees that the Court shall order disgorgement of ill-gotten
15 gains and prejudgment interest thereon; that the amounts of the disgorgement and
16 civil penalty shall be determined by the Court upon motion of the Commission; and
17 that prejudgment interest shall be calculated from December 5, 2012, based on the
18 rate of interest used by the Internal Revenue Service for the underpayment of federal
19 income tax as set forth in 26 U.S.C. § 6621(a)(2). Defendant further agrees that,
20 upon motion of the Commission, the Court shall determine whether a civil penalty
21 pursuant to Section 20(d) of the Securities Act [15 U.S.C. § 77t(d)] and Section
22 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)] is appropriate and, if so, the
23 amount of the penalty. Defendant further agrees that in connection with the
24 Commission's motion for disgorgement and/or civil penalties, and at any hearing held
25 on such a motion: (a) Defendant will be precluded from arguing that it did not violate
26 the federal securities laws as alleged in the Complaint; (b) Defendant may not
27 challenge the validity of this Consent or the Judgment; (c) solely for the purposes of
28 such motion, the allegations of the Complaint shall be accepted as and deemed true

1 by the Court; and (d) the Court may determine the issues raised in the motion on the
2 basis of affidavits, declarations, excerpts of sworn deposition or investigative
3 testimony, and documentary evidence, without regard to the standards for summary
4 judgment contained in Rule 56(c) of the Federal Rules of Civil Procedure. In
5 connection with the Commission's motion for disgorgement and/or civil penalties,
6 the parties may take discovery, including discovery from appropriate non-parties.

7 4. Defendant waives the entry of findings of fact and conclusions of law
8 pursuant to Rule 52 of the Federal Rules of Civil Procedure.

9 5. Defendant waives the right, if any, to a jury trial and to appeal from the
10 entry of the Judgment.

11 6. Defendant enters into this Consent voluntarily and represents that no
12 threats, offers, promises, or inducements of any kind have been made by the
13 Commission or any member, officer, employee, agent, or representative of the
14 Commission to induce Defendant to enter into this Consent.

15 7. Defendant agrees that this Consent shall be incorporated into the
16 Judgment with the same force and effect as if fully set forth therein.

17 8. Defendant will not oppose the enforcement of the Judgment on the
18 ground, if any exists, that it fails to comply with Rule 65(d) of the Federal Rules of
19 Civil Procedure, and hereby waives any objection based thereon.

20 9. Defendant waives service of the Judgment and agrees that entry of the
21 Judgment by the Court and filing with the Clerk of the Court will constitute notice to
22 Defendant of its terms and conditions. Defendant further agrees to provide counsel
23 for the Commission, within thirty days after the Judgment is filed with the Clerk of
24 the Court, with an affidavit or declaration stating that Defendant has received and
25 read a copy of the Judgment.

26 10. Consistent with 17 C.F.R. 202.5(f), this Consent resolves only certain
27 claims asserted against Defendant in this civil proceeding. Defendant acknowledges
28 that no promise or representation has been made by the Commission or any member,

1 officer, employee, agent, or representative of the Commission with regard to any
2 criminal liability that may have arisen or may arise from the facts underlying this
3 action or immunity from any such criminal liability. Defendant waives any claim of
4 Double Jeopardy based upon the settlement of this proceeding, including the
5 imposition of any remedy or civil penalty herein. Defendant further acknowledges
6 that the Court's entry of a permanent injunction may have collateral consequences
7 under federal or state law and the rules and regulations of self-regulatory
8 organizations, licensing boards, and other regulatory organizations. Such collateral
9 consequences include, but are not limited to, a statutory disqualification with respect
10 to membership or participation in, or association with a member of, a self-regulatory
11 organization. This statutory disqualification has consequences that are separate from
12 any sanction imposed in an administrative proceeding. In addition, in any
13 disciplinary proceeding before the Commission based on the entry of the injunction in
14 this action, Defendant understands that it shall not be permitted to contest the factual
15 allegations of the complaint in this action.

16 11. Defendant understands and agrees to comply with the terms of 17 C.F.R.
17 § 202.5(e), which provides in part that it is the Commission's policy "not to permit a
18 defendant or respondent to consent to a judgment or order that imposes a sanction
19 while denying the allegations in the complaint or order for proceedings," and "a
20 refusal to admit the allegations is equivalent to a denial, unless the defendant or
21 respondent states that he neither admits nor denies the allegations." As part of
22 Defendant's agreement to comply with the terms of Section 202.5(e), Defendant: (i)
23 will not take any action or make or permit to be made any public statement denying,
24 directly or indirectly, any allegation in the complaint or creating the impression that
25 the complaint is without factual basis; (ii) will not make or permit to be made any
26 public statement to the effect that Defendant does not admit the allegations of the
27 complaint, or that this Consent contains no admission of the allegations, without also
28 stating that Defendant does not deny the allegations; (iii) upon the filing of this

1 Consent, Defendant hereby withdraws any papers filed in this action to the extent that
2 they deny any allegation in the complaint. If Defendant breaches this agreement, the
3 Commission may petition the Court to vacate the Judgment and restore this action to
4 its active docket. Nothing in this paragraph affects Defendant's: (i) testimonial
5 obligations; or (ii) right to take legal or factual positions in litigation or other legal
6 proceedings in which the Commission is not a party.

7 12. Defendant hereby waives any rights under the Equal Access to Justice
8 Act, the Small Business Regulatory Enforcement Fairness Act of 1996, or any other
9 provision of law to seek from the United States, or any agency, or any official of the
10 United States acting in his or her official capacity, directly or indirectly,
11 reimbursement of attorney's fees or other fees, expenses, or costs expended by
12 Defendant to defend against this action. For these purposes, Defendant agrees that
13 Defendant is not the prevailing party in this action since the parties have reached a
14 good faith settlement.

15 13. In connection with this action and any related judicial or administrative
16 proceeding or investigation commenced by the Commission or to which the
17 Commission is a party, Defendant (i) agrees to appear and be interviewed by
18 Commission staff at such times and places as the staff requests upon reasonable
19 notice; (ii) will accept service by mail or facsimile transmission of notices or
20 subpoenas issued by the Commission for documents or testimony at depositions,
21 hearings, or trials, or in connection with any related investigation by Commission
22 staff; (iii) appoints Defendant's undersigned attorney as agent to receive service of
23 such notices and subpoenas; (iv) with respect to such notices and subpoenas, waives
24 the territorial limits on service contained in Rule 45 of the Federal Rules of Civil
25 Procedure and any applicable local rules, provided that the party requesting the
26 testimony reimburses Defendant's travel, lodging, and subsistence expenses at the then-
27 prevailing U.S. Government per diem rates; and (v) consents to personal jurisdiction
28 over Defendant in any United States District Court for purposes of enforcing any

1 such subpoena.

2 14. Defendant agrees that the Commission may present the Judgment to the
3 Court for signature and entry without further notice.

4 15. Defendant agrees that this Court shall retain jurisdiction over this matter
5 for the purpose of enforcing the terms of the Judgment.

6 16. Defendant agrees that the Preliminary Injunction, Order Appointing
7 Receiver, Freezing Assets, and Providing for Other Ancillary Relief entered by the
8 Court on December 12, 2015 shall remain in full force and effect as to Defendant
9 following entry of the Judgment.

10 Suncor Fontana, LLC

11 By: 


12 Stephen J. Donell
13 Court Appointed Receiver for
14 Suncor Fontana, LLC
15 12121 Wilshire Blvd., Suite 1120
16 Los Angeles, CA 90025

17 *See attached notarial certificate*

18 On _____, 200_, _____, a person
19 known to me, personally appeared before me and acknowledged executing the
20 foregoing Consent with full authority to do so on behalf of Suncor Fontana, LLC,
21 pursuant to the Order Appointing Receiver in this matter.

22 _____
23 Notary Public
24 Commission expires:

25 Approved as to form:

26 
27 David R. Zaro, Esq.

28 Allen Matkins Leck Gamble Mallory & Natsis LLP
515 South Figueroa Street, Ninth Floor
Los Angeles, CA 90071-3309

Attorney for Receiver

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

CIVIL CODE § 1189

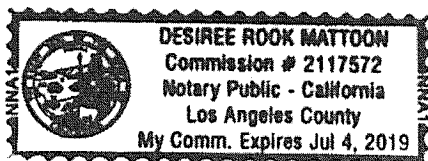
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of Los Angeles)
On May 25, 2016 before me, Desiree Rook Mattoon, Notary Public
Date Here Insert Name and Title of the Officer
personally appeared Stephen J. Donell
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that ~~he/she/they~~ executed the same in ~~his/her/their~~ authorized capacity(ies), and that by ~~his/her/their~~ signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature Desiree Rook Mattoon
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Consent of Def Suncor Fontana Document Date: No date
Number of Pages: _____ Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____
Signer Is Representing: _____

Signer's Name: _____
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____
Signer Is Representing: _____

EXHIBIT 2

1 ZACHARY T. CARLYLE
 2 LESLIE J. HUGHES
 2 Admitted *pro hac vice*
 3 CarlyleZ@sec.gov
 3 HughesLJ@sec.gov
 4 SECURITIES AND EXCHANGE COMMISSION
 4 Byron G. Rogers Federal Building
 5 1961 Stout Street, Suite 1700
 5 Denver, Colorado 80294-1961
 6 Telephone: (303) 844-1000
 6 Facsimile: (303) 297-3529

7 LOCAL COUNSEL:
 8 David J. VanHavermaat, Cal. Bar No. 175761
 8 VanhavermaatD@sec.gov
 9 SECURITIES AND EXCHANGE COMMISSION
 9 444 S. Flower Street, Suite 900
 10 Los Angeles, California 90071
 10 Telephone: (323) 965-3213
 11 Facsimile: (213) 443-1904

12 **UNITED STATES DISTRICT COURT**
 13 **CENTRAL DISTRICT OF CALIFORNIA**

14 SECURITIES AND EXCHANGE
 15 COMMISSION,
 16 Plaintiff,

17 vs.

18 ROBERT YANG,
 18 CLAUDIA KANO,
 19 SUNCOR FONTANA, LLC,
 20 SUNCOR HESPERIA, LLC, AND
 20 SUNCOR CARE LYNWOOD, LLC
 21 Defendants,

22 AND

23 YANROB'S MEDICAL, INC.,
 24 HEALTHPRO CAPITAL PARTNERS, LLC,
 24 AND SUNCOR CARE, INC.
 25 Relief Defendants.

Case No. 5:15-cv-02387-SVW (KKx)

CONSENT OF DEFENDANT
SUNCOR HESPERIA, LLC

26
 27
 28

1 1. Defendant Suncor Hesperia, LLC ("Defendant") acknowledges having
2 been served with the complaint in this action and having entered a general
3 appearance, and admits the Court's jurisdiction over Defendant and over the subject
4 matter of this action.

5 2. Without admitting or denying the allegations of the complaint (except as
6 provided as to personal and subject matter jurisdiction, which Defendant admits),
7 Defendant hereby consents to the entry of the Judgment in the form attached hereto
8 (the "Judgment") and incorporated by reference herein, which, among other things:

9 (a) permanently restrains and enjoins Defendant from violation of
10 Section 17(a) of the Securities Act of 1933 ("Securities Act") [15
11 U.S.C. § 77q(a)], Section 10(b) of the Securities Exchange Act of
12 1934 ("Exchange Act") and Rule 10b-5 thereunder [15 U.S.C. §
13 78j(b) and 17 C.F.R. § 240.10b-5].

14 3. Defendant agrees that the Court shall order disgorgement of ill-gotten
15 gains and prejudgment interest thereon; that the amounts of the disgorgement and
16 civil penalty shall be determined by the Court upon motion of the Commission; and
17 that prejudgment interest shall be calculated from December 5, 2012, based on the
18 rate of interest used by the Internal Revenue Service for the underpayment of federal
19 income tax as set forth in 26 U.S.C. § 6621(a)(2). Defendant further agrees that,
20 upon motion of the Commission, the Court shall determine whether a civil penalty
21 pursuant to Section 20(d) of the Securities Act [15 U.S.C. § 77t(d)] and Section
22 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)] is appropriate and, if so, the
23 amount of the penalty. Defendant further agrees that in connection with the
24 Commission's motion for disgorgement and/or civil penalties, and at any hearing held
25 on such a motion: (a) Defendant will be precluded from arguing that it did not violate
26 the federal securities laws as alleged in the Complaint; (b) Defendant may not
27 challenge the validity of this Consent or the Judgment; (c) solely for the purposes of
28 such motion, the allegations of the Complaint shall be accepted as and deemed true

1 by the Court; and (d) the Court may determine the issues raised in the motion on the
2 basis of affidavits, declarations, excerpts of sworn deposition or investigative
3 testimony, and documentary evidence, without regard to the standards for summary
4 judgment contained in Rule 56(c) of the Federal Rules of Civil Procedure. In
5 connection with the Commission's motion for disgorgement and/or civil penalties,
6 the parties may take discovery, including discovery from appropriate non-parties.

7 4. Defendant waives the entry of findings of fact and conclusions of law
8 pursuant to Rule 52 of the Federal Rules of Civil Procedure.

9 5. Defendant waives the right, if any, to a jury trial and to appeal from the
10 entry of the Judgment.

11 6. Defendant enters into this Consent voluntarily and represents that no
12 threats, offers, promises, or inducements of any kind have been made by the
13 Commission or any member, officer, employee, agent, or representative of the
14 Commission to induce Defendant to enter into this Consent.

15 7. Defendant agrees that this Consent shall be incorporated into the
16 Judgment with the same force and effect as if fully set forth therein.

17 8. Defendant will not oppose the enforcement of the Judgment on the
18 ground, if any exists, that it fails to comply with Rule 65(d) of the Federal Rules of
19 Civil Procedure, and hereby waives any objection based thereon.

20 9. Defendant waives service of the Judgment and agrees that entry of the
21 Judgment by the Court and filing with the Clerk of the Court will constitute notice to
22 Defendant of its terms and conditions. Defendant further agrees to provide counsel
23 for the Commission, within thirty days after the Judgment is filed with the Clerk of
24 the Court, with an affidavit or declaration stating that Defendant has received and
25 read a copy of the Judgment.

26 10. Consistent with 17 C.F.R. 202.5(f), this Consent resolves only certain
27 claims asserted against Defendant in this civil proceeding. Defendant acknowledges
28 that no promise or representation has been made by the Commission or any member,

1 officer, employee, agent, or representative of the Commission with regard to any
2 criminal liability that may have arisen or may arise from the facts underlying this
3 action or immunity from any such criminal liability. Defendant waives any claim of
4 Double Jeopardy based upon the settlement of this proceeding, including the
5 imposition of any remedy or civil penalty herein. Defendant further acknowledges
6 that the Court's entry of a permanent injunction may have collateral consequences
7 under federal or state law and the rules and regulations of self-regulatory
8 organizations, licensing boards, and other regulatory organizations. Such collateral
9 consequences include, but are not limited to, a statutory disqualification with respect
10 to membership or participation in, or association with a member of, a self-regulatory
11 organization. This statutory disqualification has consequences that are separate from
12 any sanction imposed in an administrative proceeding. In addition, in any
13 disciplinary proceeding before the Commission based on the entry of the injunction in
14 this action, Defendant understands that it shall not be permitted to contest the factual
15 allegations of the complaint in this action.

16 11. Defendant understands and agrees to comply with the terms of 17 C.F.R.
17 § 202.5(e), which provides in part that it is the Commission's policy "not to permit a
18 defendant or respondent to consent to a judgment or order that imposes a sanction
19 while denying the allegations in the complaint or order for proceedings," and "a
20 refusal to admit the allegations is equivalent to a denial, unless the defendant or
21 respondent states that he neither admits nor denies the allegations." As part of
22 Defendant's agreement to comply with the terms of Section 202.5(e), Defendant: (i)
23 will not take any action or make or permit to be made any public statement denying,
24 directly or indirectly, any allegation in the complaint or creating the impression that
25 the complaint is without factual basis; (ii) will not make or permit to be made any
26 public statement to the effect that Defendant does not admit the allegations of the
27 complaint, or that this Consent contains no admission of the allegations, without also
28 stating that Defendant does not deny the allegations; (iii) upon the filing of this

1 Consent, Defendant hereby withdraws any papers filed in this action to the extent that
2 they deny any allegation in the complaint. If Defendant breaches this agreement, the
3 Commission may petition the Court to vacate the Judgment and restore this action to
4 its active docket. Nothing in this paragraph affects Defendant's: (i) testimonial
5 obligations; or (ii) right to take legal or factual positions in litigation or other legal
6 proceedings in which the Commission is not a party.

7 12. Defendant hereby waives any rights under the Equal Access to Justice
8 Act, the Small Business Regulatory Enforcement Fairness Act of 1996, or any other
9 provision of law to seek from the United States, or any agency, or any official of the
10 United States acting in his or her official capacity, directly or indirectly,
11 reimbursement of attorney's fees or other fees, expenses, or costs expended by
12 Defendant to defend against this action. For these purposes, Defendant agrees that
13 Defendant is not the prevailing party in this action since the parties have reached a
14 good faith settlement.

15 13. In connection with this action and any related judicial or administrative
16 proceeding or investigation commenced by the Commission or to which the
17 Commission is a party, Defendant (i) agrees to appear and be interviewed by
18 Commission staff at such times and places as the staff requests upon reasonable
19 notice; (ii) will accept service by mail or facsimile transmission of notices or
20 subpoenas issued by the Commission for documents or testimony at depositions,
21 hearings, or trials, or in connection with any related investigation by Commission
22 staff; (iii) appoints Defendant's undersigned attorney as agent to receive service of
23 such notices and subpoenas; (iv) with respect to such notices and subpoenas, waives
24 the territorial limits on service contained in Rule 45 of the Federal Rules of Civil
25 Procedure and any applicable local rules, provided that the party requesting the
26 testimony reimburses Defendant's travel, lodging, and subsistence expenses at the then-
27 prevailing U.S. Government per diem rates; and (v) consents to personal jurisdiction
28 over Defendant in any United States District Court for purposes of enforcing any

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

CIVIL CODE § 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of Los Angeles)
On May 25, 2016 before me, Desiree Rook Mattoon, Notary Public,
Date Here Insert Name and Title of the Officer
personally appeared Stephen J. Dowell
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity(ies), and that by his signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.
Signature Desiree Rook Mattoon
Signature of Notary Public



Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Consent of Def. Suncor Hispania Document Date: No date
Number of Pages: _____ Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____
Signer Is Representing: _____

Signer's Name: _____
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____
Signer Is Representing: _____

EXHIBIT 3

1 ZACHARY T. CARLYLE
 2 LESLIE J. HUGHES
 3 Admitted *pro hac vice*
 4 CarlyleZ@sec.gov
 5 HughesLJ@sec.gov
 6 SECURITIES AND EXCHANGE COMMISSION
 7 Byron G. Rogers Federal Building
 8 1961 Stout Street, Suite 1700
 9 Denver, Colorado 80294-1961
 10 Telephone: (303) 844-1000
 11 Facsimile: (303) 297-3529

12 **LOCAL COUNSEL:**
 13 David J. VanHavermaat, Cal. Bar No. 175761
 14 VanhavermaatD@sec.gov
 15 SECURITIES AND EXCHANGE COMMISSION
 16 444 S. Flower Street, Suite 900
 17 Los Angeles, California 90071
 18 Telephone: (323) 965-3213
 19 Facsimile: (213) 443-1904

20 **UNITED STATES DISTRICT COURT**
 21 **CENTRAL DISTRICT OF CALIFORNIA**

22 SECURITIES AND EXCHANGE
 23 COMMISSION,
 24 Plaintiff,

25 vs.

26 ROBERT YANG,
 27 CLAUDIA KANO,
 28 SUNCOR FONTANA, LLC,
 SUNCOR HESPERIA, LLC, AND
 SUNCOR CARE LYNWOOD, LLC
 Defendants,

AND

YANROB'S MEDICAL, INC.,
 HEALTHPRO CAPITAL PARTNERS, LLC,
 AND SUNCOR CARE, INC.
 Relief Defendants.

Case No. 5:15-cv-02387-SVW (KKx)

CONSENT OF DEFENDANT
SUNCOR CARE LYNWOOD, LLC

1 1. Defendant Suncor Care Lynwood, LLC ("Defendant") acknowledges
2 having been served with the complaint in this action and having entered a general
3 appearance, and admits the Court's jurisdiction over Defendant and over the subject
4 matter of this action.

5 2. Without admitting or denying the allegations of the complaint (except as
6 provided as to personal and subject matter jurisdiction, which Defendant admits),
7 Defendant hereby consents to the entry of the Judgment in the form attached hereto
8 (the "Judgment") and incorporated by reference herein, which, among other things:

- 9 (a) permanently restrains and enjoins Defendant from violation of
10 Section 17(a) of the Securities Act of 1933 ("Securities Act") [15
11 U.S.C. § 77q(a)], Section 10(b) of the Securities Exchange Act of
12 1934 ("Exchange Act") and Rule 10b-5 thereunder [15 U.S.C. §
13 78j(b) and 17 C.F.R. § 240.10b-5].

14 3. Defendant agrees that the Court shall order disgorgement of ill-gotten
15 gains and prejudgment interest thereon; that the amounts of the disgorgement and
16 civil penalty shall be determined by the Court upon motion of the Commission; and
17 that prejudgment interest shall be calculated from December 5, 2012, based on the
18 rate of interest used by the Internal Revenue Service for the underpayment of federal
19 income tax as set forth in 26 U.S.C. § 6621(a)(2). Defendant further agrees that,
20 upon motion of the Commission, the Court shall determine whether a civil penalty
21 pursuant to Section 20(d) of the Securities Act [15 U.S.C. § 77t(d)] and Section
22 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)] is appropriate and, if so, the
23 amount of the penalty. Defendant further agrees that in connection with the
24 Commission's motion for disgorgement and/or civil penalties, and at any hearing held
25 on such a motion: (a) Defendant will be precluded from arguing that it did not violate
26 the federal securities laws as alleged in the Complaint; (b) Defendant may not
27 challenge the validity of this Consent or the Judgment; (c) solely for the purposes of
28 such motion, the allegations of the Complaint shall be accepted as and deemed true

1 by the Court; and (d) the Court may determine the issues raised in the motion on the
2 basis of affidavits, declarations, excerpts of sworn deposition or investigative
3 testimony, and documentary evidence, without regard to the standards for summary
4 judgment contained in Rule 56(c) of the Federal Rules of Civil Procedure. In
5 connection with the Commission's motion for disgorgement and/or civil penalties,
6 the parties may take discovery, including discovery from appropriate non-parties.

7 4. Defendant waives the entry of findings of fact and conclusions of law
8 pursuant to Rule 52 of the Federal Rules of Civil Procedure.

9 5. Defendant waives the right, if any, to a jury trial and to appeal from the
10 entry of the Judgment.

11 6. Defendant enters into this Consent voluntarily and represents that no
12 threats, offers, promises, or inducements of any kind have been made by the
13 Commission or any member, officer, employee, agent, or representative of the
14 Commission to induce Defendant to enter into this Consent.

15 7. Defendant agrees that this Consent shall be incorporated into the
16 Judgment with the same force and effect as if fully set forth therein.

17 8. Defendant will not oppose the enforcement of the Judgment on the
18 ground, if any exists, that it fails to comply with Rule 65(d) of the Federal Rules of
19 Civil Procedure, and hereby waives any objection based thereon.

20 9. Defendant waives service of the Judgment and agrees that entry of the
21 Judgment by the Court and filing with the Clerk of the Court will constitute notice to
22 Defendant of its terms and conditions. Defendant further agrees to provide counsel
23 for the Commission, within thirty days after the Judgment is filed with the Clerk of
24 the Court, with an affidavit or declaration stating that Defendant has received and
25 read a copy of the Judgment.

26 10. Consistent with 17 C.F.R. 202.5(f), this Consent resolves only certain
27 claims asserted against Defendant in this civil proceeding. Defendant acknowledges
28 that no promise or representation has been made by the Commission or any member,

1 officer, employee, agent, or representative of the Commission with regard to any
2 criminal liability that may have arisen or may arise from the facts underlying this
3 action or immunity from any such criminal liability. Defendant waives any claim of
4 Double Jeopardy based upon the settlement of this proceeding, including the
5 imposition of any remedy or civil penalty herein. Defendant further acknowledges
6 that the Court's entry of a permanent injunction may have collateral consequences
7 under federal or state law and the rules and regulations of self-regulatory
8 organizations, licensing boards, and other regulatory organizations. Such collateral
9 consequences include, but are not limited to, a statutory disqualification with respect
10 to membership or participation in, or association with a member of, a self-regulatory
11 organization. This statutory disqualification has consequences that are separate from
12 any sanction imposed in an administrative proceeding. In addition, in any
13 disciplinary proceeding before the Commission based on the entry of the injunction in
14 this action, Defendant understands that it shall not be permitted to contest the factual
15 allegations of the complaint in this action.

16 11. Defendant understands and agrees to comply with the terms of 17 C.F.R.
17 § 202.5(e), which provides in part that it is the Commission's policy "not to permit a
18 defendant or respondent to consent to a judgment or order that imposes a sanction
19 while denying the allegations in the complaint or order for proceedings," and "a
20 refusal to admit the allegations is equivalent to a denial, unless the defendant or
21 respondent states that he neither admits nor denies the allegations." As part of
22 Defendant's agreement to comply with the terms of Section 202.5(e), Defendant: (i)
23 will not take any action or make or permit to be made any public statement denying,
24 directly or indirectly, any allegation in the complaint or creating the impression that
25 the complaint is without factual basis; (ii) will not make or permit to be made any
26 public statement to the effect that Defendant does not admit the allegations of the
27 complaint, or that this Consent contains no admission of the allegations, without also
28 stating that Defendant does not deny the allegations; (iii) upon the filing of this

1 Consent, Defendant hereby withdraws any papers filed in this action to the extent that
2 they deny any allegation in the complaint. If Defendant breaches this agreement, the
3 Commission may petition the Court to vacate the Judgment and restore this action to
4 its active docket. Nothing in this paragraph affects Defendant's: (i) testimonial
5 obligations; or (ii) right to take legal or factual positions in litigation or other legal
6 proceedings in which the Commission is not a party.

7 12. Defendant hereby waives any rights under the Equal Access to Justice
8 Act, the Small Business Regulatory Enforcement Fairness Act of 1996, or any other
9 provision of law to seek from the United States, or any agency, or any official of the
10 United States acting in his or her official capacity, directly or indirectly,
11 reimbursement of attorney's fees or other fees, expenses, or costs expended by
12 Defendant to defend against this action. For these purposes, Defendant agrees that
13 Defendant is not the prevailing party in this action since the parties have reached a
14 good faith settlement.

15 13. In connection with this action and any related judicial or administrative
16 proceeding or investigation commenced by the Commission or to which the
17 Commission is a party, Defendant (i) agrees to appear and be interviewed by
18 Commission staff at such times and places as the staff requests upon reasonable
19 notice; (ii) will accept service by mail or facsimile transmission of notices or
20 subpoenas issued by the Commission for documents or testimony at depositions,
21 hearings, or trials, or in connection with any related investigation by Commission
22 staff; (iii) appoints Defendant's undersigned attorney as agent to receive service of
23 such notices and subpoenas; (iv) with respect to such notices and subpoenas, waives
24 the territorial limits on service contained in Rule 45 of the Federal Rules of Civil
25 Procedure and any applicable local rules, provided that the party requesting the
26 testimony reimburses Defendant's travel, lodging, and subsistence expenses at the then-
27 prevailing U.S. Government per diem rates; and (v) consents to personal jurisdiction
28 over Defendant in any United States District Court for purposes of enforcing any

1 such subpoena.

2 14. Defendant agrees that the Commission may present the Judgment to the
3 Court for signature and entry without further notice.

4 15. Defendant agrees that this Court shall retain jurisdiction over this matter
5 for the purpose of enforcing the terms of the Judgment.

6 16. Defendant agrees that the Preliminary Injunction, Order Appointing
7 Receiver, Freezing Assets, and Providing for Other Ancillary Relief entered by the
8 Court on December 12, 2015 shall remain in full force and effect as to Defendant
9 following entry of the Judgment.

10 Suncor Care Lynwood, LLC

11 By: 
12 _____

13 Stephen J. Donell
14 Court Appointed Receiver for
15 Suncor Care Lynwood, LLC
16 12121 Wilshire Blvd., Suite 1120
17 Los Angeles, CA 90025

18 On See attached notarial certificate, 200 , a person
19 known to me, personally appeared before me and acknowledged executing the
20 foregoing Consent with full authority to do so on behalf of Suncor Care Lynwood,
21 LLC, pursuant to the Order Appointing Receiver in this matter.

22 _____
23 Notary Public
24 Commission expires:

25 Approved as to form:

26 
27 _____

28 David R. Zaro, Esq.
Allen Matkins Leck Gamble Mallory & Natsis LLP
515 South Figueroa Street, Ninth Floor
Los Angeles, CA 90071-3309

Attorney for Receiver

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

CIVIL CODE § 1189

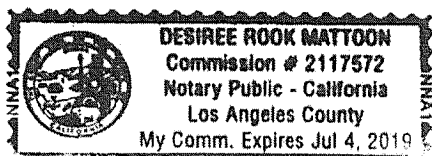
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of Los Angeles)
On May 25, 2016 before me, Desiree Rook Mattoon, Notary Public
Date Here Insert Name and Title of the Officer
personally appeared Stephen J. Donell
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) (s) are subscribed to the within instrument and acknowledged to me that (s) he/she/they executed the same in his/her/their authorized capacity(ies), and that by (s) his/her/their signature(s) on the instrument the person(s); or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature Desiree Rook Mattoon
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Consent of Sincere Care Lynnwood Document Date: no date
Number of Pages: _____ Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____
Signer Is Representing: _____

Signer's Name: _____
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____
Signer Is Representing: _____

EXHIBIT 4

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

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

**SECURITIES AND EXCHANGE
COMMISSION,**
Plaintiff,

vs.

**ROBERT YANG,
CLAUDIA KANO,
SUNCOR FONTANA, LLC,
SUNCOR HESPERIA, LLC, AND
SUNCOR CARE LYNWOOD, LLC**
Defendants,

AND

**YANROB'S MEDICAL, INC.,
HEALTHPRO CAPITAL PARTNERS, LLC,
AND SUNCOR CARE, INC.**
Relief Defendants.

Case No. 5:15-cv-02387-SVW (KKx)

**JUDGMENT AS TO DEFENDANT
SUNCOR FONTANA, LLC**

The Securities and Exchange Commission having filed a Complaint and Defendant Suncor Fontana, LLC, having entered a general appearance; consented to the Court's jurisdiction over Defendant and the subject matter of this action; consented to entry of this Judgment without admitting or denying the allegations of the Complaint (except as to jurisdiction, which is admitted); waived findings of fact and conclusions of law; and waived any right to appeal from this Judgment:

I.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendant is permanently restrained and enjoined from violating, directly or indirectly, Section 10(b) of the Securities Exchange Act of 1934 (the “Exchange Act”) [15 U.S.C. § 78j(b)] and Rule 10b-5 promulgated thereunder [17 C.F.R. § 240.10b-5], by using any means or instrumentality of interstate commerce, or of the mails, or of any facility of any national securities exchange, in connection with the purchase or sale of any security:

- (a) to employ any device, scheme, or artifice to defraud;
- (b) to make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or
- (c) to engage in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this Judgment by personal service or otherwise: (a) Defendant’s officers, agents, servants, employees, and attorneys; and (b) other persons in active concert or participation with Defendant or with anyone described in (a).

II.

IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant is permanently restrained and enjoined from violating Section 17(a) of the Securities Act of 1933 (the “Securities Act”) [15 U.S.C. § 77q(a)] in the offer or sale of any security by the use of any means or instruments of transportation or communication in interstate commerce or by use of the mails, directly or indirectly:

- (a) to employ any device, scheme, or artifice to defraud;

1 (b) to obtain money or property by means of any untrue statement of a
2 material fact or any omission of a material fact necessary in order to make the
3 statements made, in light of the circumstances under which they were made,
4 not misleading; or

5 (c) to engage in any transaction, practice, or course of business which
6 operates or would operate as a fraud or deceit upon the purchaser.

7 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as
8 provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also
9 binds the following who receive actual notice of this Judgment by personal service or
10 otherwise: (a) Defendant's officers, agents, servants, employees, and attorneys; and
11 (b) other persons in active concert or participation with Defendant or with anyone
12 described in (a).

13 III.

14 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that
15 Defendant shall pay disgorgement of ill-gotten gains and prejudgment interest
16 thereon; that the amounts of the disgorgement and civil penalty shall be determined
17 by the Court upon motion of the Commission; and that prejudgment interest shall be
18 calculated from December 5, 2012, based on the rate of interest used by the Internal
19 Revenue Service for the underpayment of federal income tax as set forth in 26 U.S.C.
20 § 6621(a)(2). Upon motion of the Commission, the Court shall determine whether a
21 civil penalty pursuant to Section 20(d) of the Securities Act [15 U.S.C. § 77t(d)] and
22 Section 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)] is appropriate and, if
23 so, the amount of the penalty. In connection with the Commission's motion for
24 disgorgement and/or civil penalties, and at any hearing held on such a motion: (a)
25 Defendant will be precluded from arguing that it did not violate the federal securities
26 laws as alleged in the Complaint; (b) Defendant may not challenge the validity of the
27 Consent or this Judgment; (c) solely for the purposes of such motion, the allegations
28 of the Complaint shall be accepted as and deemed true by the Court; and (d) the Court

1 may determine the issues raised in the motion on the basis of affidavits, declarations,
2 excerpts of sworn deposition or investigative testimony, and documentary evidence,
3 without regard to the standards for summary judgment contained in Rule 56(c) of the
4 Federal Rules of Civil Procedure. In connection with the Commission's motion for
5 disgorgement and/or civil penalties, the parties may take discovery, including
6 discovery from appropriate non-parties.

7 IV.

8 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court
9 shall retain jurisdiction of this matter for the purposes of enforcing the terms of this
10 Judgment.

11 V.

12 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the
13 Preliminary Injunction, Order Appointing Receiver, Freezing Assets, and Providing
14 for Other Ancillary Relief entered by the Court on December 12, 2015 shall remain in
15 full force and effect as to Defendant following entry of the Judgment.

16 VI.

17 There being no just reason for delay, pursuant to Rule 54(b) of the Federal
18 Rules of Civil Procedure, the Clerk is ordered to enter this Judgment forthwith and
19 without further notice.

20 Dated: _____, 2016
21
22
23
24

25 _____
26 STEPHEN V. WILSON
27 UNITED STATES DISTRICT JUDGE
28

EXHIBIT 5

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

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SECURITIES AND EXCHANGE
COMMISSION,
Plaintiff,

vs.

ROBERT YANG,
CLAUDIA KANO,
SUNCOR FONTANA, LLC,
SUNCOR HESPERIA, LLC, AND
SUNCOR CARE LYNWOOD, LLC
Defendants,

AND

YANROB'S MEDICAL, INC.,
HEALTHPRO CAPITAL PARTNERS, LLC,
AND SUNCOR CARE, INC.
Relief Defendants.

Case No. 5:15-cv-02387-SVW (KKx)

**JUDGMENT AS TO DEFENDANT
SUNCOR HESPERIA, LLC**

The Securities and Exchange Commission having filed a Complaint and Defendant Suncor Hesperia, LLC, having entered a general appearance; consented to the Court's jurisdiction over Defendant and the subject matter of this action; consented to entry of this Judgment without admitting or denying the allegations of the Complaint (except as to jurisdiction, which is admitted); waived findings of fact and conclusions of law; and waived any right to appeal from this Judgment:

I.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendant is permanently restrained and enjoined from violating, directly or indirectly, Section 10(b) of the Securities Exchange Act of 1934 (the “Exchange Act”) [15 U.S.C. § 78j(b)] and Rule 10b-5 promulgated thereunder [17 C.F.R. § 240.10b-5], by using any means or instrumentality of interstate commerce, or of the mails, or of any facility of any national securities exchange, in connection with the purchase or sale of any security:

- (a) to employ any device, scheme, or artifice to defraud;
- (b) to make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or
- (c) to engage in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this Judgment by personal service or otherwise: (a) Defendant’s officers, agents, servants, employees, and attorneys; and (b) other persons in active concert or participation with Defendant or with anyone described in (a).

II.

IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant is permanently restrained and enjoined from violating Section 17(a) of the Securities Act of 1933 (the “Securities Act”) [15 U.S.C. § 77q(a)] in the offer or sale of any security by the use of any means or instruments of transportation or communication in interstate commerce or by use of the mails, directly or indirectly:

- (a) to employ any device, scheme, or artifice to defraud;

1 (b) to obtain money or property by means of any untrue statement of a
2 material fact or any omission of a material fact necessary in order to make the
3 statements made, in light of the circumstances under which they were made,
4 not misleading; or

5 (c) to engage in any transaction, practice, or course of business which
6 operates or would operate as a fraud or deceit upon the purchaser.

7 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as
8 provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also
9 binds the following who receive actual notice of this Judgment by personal service or
10 otherwise: (a) Defendant's officers, agents, servants, employees, and attorneys; and
11 (b) other persons in active concert or participation with Defendant or with anyone
12 described in (a).

13 III.

14 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that
15 Defendant shall pay disgorgement of ill-gotten gains and prejudgment interest
16 thereon; that the amounts of the disgorgement and civil penalty shall be determined
17 by the Court upon motion of the Commission; and that prejudgment interest shall be
18 calculated from December 5, 2012, based on the rate of interest used by the Internal
19 Revenue Service for the underpayment of federal income tax as set forth in 26 U.S.C.
20 § 6621(a)(2). Upon motion of the Commission, the Court shall determine whether a
21 civil penalty pursuant to Section 20(d) of the Securities Act [15 U.S.C. § 77t(d)] and
22 Section 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)] is appropriate and, if
23 so, the amount of the penalty. In connection with the Commission's motion for
24 disgorgement and/or civil penalties, and at any hearing held on such a motion: (a)
25 Defendant will be precluded from arguing that it did not violate the federal securities
26 laws as alleged in the Complaint; (b) Defendant may not challenge the validity of the
27 Consent or this Judgment; (c) solely for the purposes of such motion, the allegations
28 of the Complaint shall be accepted as and deemed true by the Court; and (d) the Court

1 may determine the issues raised in the motion on the basis of affidavits, declarations,
2 excerpts of sworn deposition or investigative testimony, and documentary evidence,
3 without regard to the standards for summary judgment contained in Rule 56(c) of the
4 Federal Rules of Civil Procedure. In connection with the Commission's motion for
5 disgorgement and/or civil penalties, the parties may take discovery, including
6 discovery from appropriate non-parties.

7 IV.

8 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court
9 shall retain jurisdiction of this matter for the purposes of enforcing the terms of this
10 Judgment.

11 V.

12 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the
13 Preliminary Injunction, Order Appointing Receiver, Freezing Assets, and Providing
14 for Other Ancillary Relief entered by the Court on December 12, 2015 shall remain in
15 full force and effect as to Defendant following entry of the Judgment.

16 VI.

17 There being no just reason for delay, pursuant to Rule 54(b) of the Federal
18 Rules of Civil Procedure, the Clerk is ordered to enter this Judgment forthwith and
19 without further notice.

20 Dated: _____, 2016
21
22
23
24

25 _____
26 STEPHEN V. WILSON
27 UNITED STATES DISTRICT
28

EXHIBIT 6

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

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SECURITIES AND EXCHANGE
COMMISSION,
Plaintiff,

vs.

ROBERT YANG,
CLAUDIA KANO,
SUNCOR FONTANA, LLC,
SUNCOR HESPERIA, LLC, AND
SUNCOR CARE LYNWOOD, LLC
Defendants,

AND

YANROB'S MEDICAL, INC.,
HEALTHPRO CAPITAL PARTNERS, LLC,
AND SUNCOR CARE, INC.
Relief Defendants.

Case No. 5:15-cv-02387-SVW (KKx)

**JUDGMENT AS TO DEFENDANT
SUNCOR CARE LYNWOOD, LLC**

The Securities and Exchange Commission having filed a Complaint and Defendant Suncor Care Lynwood, LLC, having entered a general appearance; consented to the Court's jurisdiction over Defendant and the subject matter of this action; consented to entry of this Judgment without admitting or denying the allegations of the Complaint (except as to jurisdiction, which is admitted); waived findings of fact and conclusions of law; and waived any right to appeal from this

1 Judgment:

2 I.

3 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendant is
4 permanently restrained and enjoined from violating, directly or indirectly, Section
5 10(b) of the Securities Exchange Act of 1934 (the “Exchange Act”) [15 U.S.C. §
6 78j(b)] and Rule 10b-5 promulgated thereunder [17 C.F.R. § 240.10b-5], by using
7 any means or instrumentality of interstate commerce, or of the mails, or of any
8 facility of any national securities exchange, in connection with the purchase or sale of
9 any security:

- 10 (a) to employ any device, scheme, or artifice to defraud;
- 11 (b) to make any untrue statement of a material fact or to omit to state a
12 material fact necessary in order to make the statements made, in the light of the
13 circumstances under which they were made, not misleading; or
- 14 (c) to engage in any act, practice, or course of business which operates or
15 would operate as a fraud or deceit upon any person.

16 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as
17 provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also
18 binds the following who receive actual notice of this Judgment by personal service or
19 otherwise: (a) Defendant’s officers, agents, servants, employees, and attorneys; and
20 (b) other persons in active concert or participation with Defendant or with anyone
21 described in (a).

22 II.

23 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that
24 Defendant is permanently restrained and enjoined from violating Section 17(a) of the
25 Securities Act of 1933 (the “Securities Act”) [15 U.S.C. § 77q(a)] in the offer or sale
26 of any security by the use of any means or instruments of transportation or
27 communication in interstate commerce or by use of the mails, directly or indirectly:

- 28 (a) to employ any device, scheme, or artifice to defraud;

1 (b) to obtain money or property by means of any untrue statement of a
2 material fact or any omission of a material fact necessary in order to make the
3 statements made, in light of the circumstances under which they were made,
4 not misleading; or

5 (c) to engage in any transaction, practice, or course of business which
6 operates or would operate as a fraud or deceit upon the purchaser.

7 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as
8 provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also
9 binds the following who receive actual notice of this Judgment by personal service or
10 otherwise: (a) Defendant's officers, agents, servants, employees, and attorneys; and
11 (b) other persons in active concert or participation with Defendant or with anyone
12 described in (a).

13 III.

14 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that
15 Defendant shall pay disgorgement of ill-gotten gains and prejudgment interest
16 thereon; that the amounts of the disgorgement and civil penalty shall be determined
17 by the Court upon motion of the Commission; and that prejudgment interest shall be
18 calculated from December 5, 2012, based on the rate of interest used by the Internal
19 Revenue Service for the underpayment of federal income tax as set forth in 26 U.S.C.
20 § 6621(a)(2). Upon motion of the Commission, the Court shall determine whether a
21 civil penalty pursuant to Section 20(d) of the Securities Act [15 U.S.C. § 77t(d)] and
22 Section 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)] is appropriate and, if
23 so, the amount of the penalty. In connection with the Commission's motion for
24 disgorgement and/or civil penalties, and at any hearing held on such a motion: (a)
25 Defendant will be precluded from arguing that it did not violate the federal securities
26 laws as alleged in the Complaint; (b) Defendant may not challenge the validity of the
27 Consent or this Judgment; (c) solely for the purposes of such motion, the allegations
28 of the Complaint shall be accepted as and deemed true by the Court; and (d) the Court

1 may determine the issues raised in the motion on the basis of affidavits, declarations,
2 excerpts of sworn deposition or investigative testimony, and documentary evidence,
3 without regard to the standards for summary judgment contained in Rule 56(c) of the
4 Federal Rules of Civil Procedure. In connection with the Commission's motion for
5 disgorgement and/or civil penalties, the parties may take discovery, including
6 discovery from appropriate non-parties.

7 IV.

8 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court
9 shall retain jurisdiction of this matter for the purposes of enforcing the terms of this
10 Judgment.

11 V.

12 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the
13 Preliminary Injunction, Order Appointing Receiver, Freezing Assets, and Providing
14 for Other Ancillary Relief entered by the Court on December 12, 2015 shall remain in
15 full force and effect as to Defendant following entry of the Judgment.

16 VI.

17 There being no just reason for delay, pursuant to Rule 54(b) of the Federal
18 Rules of Civil Procedure, the Clerk is ordered to enter this Judgment forthwith and
19 without further notice.

20 Dated: _____, 2016
21
22
23
24

25 _____
26 STEPHEN V. WILSON
27 UNITED STATES DISTRICT
28