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7 Attorneys for Receiver
 8 STEPHEN J. DONELL

9 UNITED STATES DISTRICT COURT
 10 CENTRAL DISTRICT OF CALIFORNIA

11
 12 SECURITIES AND EXCHANGE
 13 COMMISSION,

14 Plaintiff,

15 v.

16 ROBERT YANG; et al.,

17
 18 Defendants.

19 and

20
 21 YANROB'S MEDICAL, INC.; et al.,

22 Relief Defendants.
 23

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

**DECLARATION OF RECEIVER,
 STEPHEN J. DONELL, IN SUPPORT
 OF THE FIFTH INTERIM
 APPLICATION FOR PAYMENT OF
 FEES AND REIMBURSEMENT OF
 EXPENSES OF RECEIVER AND HIS
 PROFESSIONALS**

[Notice of Application for Payment of
 Fees and Reimbursement of Expenses;
 Fifth Interim Application of Receiver and
 His Professionals; Memorandum of
 Points and Authorities; and [Proposed]
 Order submitted concurrently herewith]

Date: January 29, 2018
 Time: 1:30 p.m.
 Ctrm: 10A
 Judge: Hon. Stephen V. Wilson

DECLARATION OF STEPHEN J. DONELL

I, Stephen J. Donell, declare as follows:

1. I am the receiver appointed by this Court for Defendants Suncor Fontana, LLC, Suncor Hesperia, LLC, Suncor Care Lynwood, LLC, and their respective subsidiaries and affiliates (collectively, the "Receivership Entities" or "Entities"). I make this Declaration in support of the concurrently filed application for payment of fees and reimbursement of expenses (the "Application") of myself, and Allen Matkins Leck Gamble Mallory & Natsis LLP, my counsel of record. I have personal knowledge of the facts set forth herein and, if called to testify, could testify competently thereto.

2. As reflected in my Initial Report of Receiver (Dkt. No. 20), in my First Quarterly Status Report (Dkt. No. 53), my Second Quarterly Status Report (Dkt No. 129), my Third Quarterly Status Report (Dkt. No. 150), and my Fourth Quarterly Status Report (Dkt. No. 174) since my appointment as Receiver I have, among many other things:

- Continued to administer the estates of the Receivership Entities (collectively, the "Estate");
- Confirmed the amount and location of millions in cash assets potentially available for recovery and subject to turn-over requirements of the Appointment Order;
- Negotiated and entered into a tentative settlement (later approved by the Court, see Dkt. No. 170) with the Metropolitan Water District of Southern California (the "MWD") in connection with \$250,000 in funds paid by the Receivership Entities in the pre-receivership period in a failed real estate transaction;
- Secured the turn-over of \$2 million of the above-referenced cash deposits from Celtic Bank Corporation ("Celtic Bank"), the rights to such funds which have recently been resolved by stipulation and order;

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- Continued to develop and undertake a marketing and disposition plan in connection with each of the real properties implicated in this matter, including via the engagement of real property brokers and the commencement of marketing efforts for all saleable properties;
- Coordinated with Celtic Bank and with GBC International Bank regarding the abandonment of two of the real properties implicated in this matter;
- Identified two real properties determined to be "underwater," and subject to immediate abandonment, and prepared and filed a motion for authority to complete an abandonment of those properties, ultimately resulting in the Court-approved abandonment of these properties during Application Period;
- Negotiated with prospective buyers regarding the Entities' remaining real estate assets, which sales the Receiver anticipates submitting for Court approval shortly; namely, the real property and improvement located at 3599 Norton Avenue, Lynwood, California 90262 (See Dkt. No. 182);
- Developed a claims process, filed a motion seeking Court approval of the proposed claims process and secured such approval;
- Prepared and submitted a Fourth Quarterly Status Report;
- Continued to monitor and participate in all pending state court litigation matters affecting or relating to the Receivership Entities, and maintained the status quo in such matters; and
- Communicated with investors (and counsel for investors) in the Receivership Entities regarding the status of the receivership, issues relating to investor immigration petitions, and registration via the my receivership website.

1 3. I have reviewed the Application, and I believe the fee and expense
2 requests therein to be fair and reasonable, and an accurate representation of the work
3 performed for the benefit of the Receivership Entities. I have likewise determined
4 that the Estate has actually benefited from the services rendered.

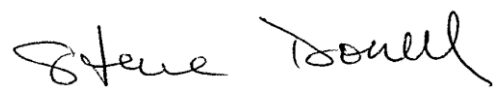
5 4. True and correct copies of all of my firm's invoices for services
6 rendered from January 1, 2017 through March 31, 2017 (the "Application Period"),
7 are attached hereto as **Exhibit A**. In my business judgment, I believe the hourly
8 rates that I and my internal professionals charged were appropriate, given the
9 requirements of the receivership, that every effort was made to have tasks completed
10 at the lowest possible billing rate, and that the total fees and expenses for which
11 approval and payment are sought are fair and reasonable.

12 5. In accordance with the Security and Exchange Commission's billing
13 procedures, I have prepared a Standardized Final Accounting Report for the estate
14 of the Receivership Entities a true and correct copy of which is attached hereto as
15 **Exhibit B**.

16 6. As of this date, and after the Court-approved payment of \$1.6 million
17 to a secured creditor of the Receivership Entities, I presently hold approximately
18 \$5.9 million for the benefit of the Receivership Entities, not including the \$2 million
19 turned over by Celtic Bank, which I am holding separately, pending an adjudication
20 of the parties rights in those funds.

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

23 Executed on December 19, 2017, at Los Angeles, California.

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Stephen J. Donell

EXHIBIT B

Standardized Fund Accounting Report for Suncor Receivership Estate- Cash Basis

Receivership; Civil Court Docket No. 5:15-cv-02387-SVW (KKx)

Reporting Period 10/1/17-10/31/17

Fund Accounting:			
	Detail	Subtotal	Grand Total
Beginning Balance:			6,060,540.63
Increases in Fund Balance:			
Business Income			
Cash and Securities			
Interest/Dividend Income	345.98		
Business Asset Liquidation	1,540,080.29		
Personal Asset Liquidation			
Third-Party Litigation Income	-		
Miscellaneous- Funds Turned Over by Celtic Bank	-		
Total Funds Available:			7,600,966.90
Decreases in Fund Balance:			
Disbursements to Investors			-
Disbursements for Receivership Operations			
<i>Disbursements to Receiver or Other Professionals</i>	1,120.00		
<i>Business Asset Expenses</i>	10,195.02		
<i>Personal Asset Expenses</i>			
<i>Investment Expenses</i>	120.00		
<i>Third-Party Litigation Expenses</i>			
1. Attorney Fees	-		
2. Litigation Expenses	-		
<i>Total Third-Party Litigation Expenses</i>		-	
<i>Tax Administrator Fees and Bonds</i>	-		
<i>Federal and State Tax Payments</i>	-		
Total Disbursements for Receivership Operations			11,435.02
Disbursements for Distribution Expenses Paid by the Fund:			
<i>Distribution Plan Development Expenses:</i>			
1. Fees:			
Fund Administrator.....	-		
Independent Distribution Consultant (IDC).....	-		
Distribution Agent.....	-		
Consultants.....	-		
Legal Advisers.....	-		
Tax Advisers.....	-		
2. Administrative Expenses	-		
3. Miscellaneous	-		
<i>Total Plan Development Expenses</i>		-	
<i>Distribution Plan Implementation Expenses:</i>			
1. Fees:			
Fund Administrator.....	-		
Independent Distribution Consultant (IDC).....	-		
Distribution Agent.....	-		
Consultants.....	-		
Legal Advisers.....	-		
Tax Advisers.....	-		
2. Administrative Expenses	-		
3. Investor Identification:			
Notice/Publishing Approved Plan.....	-		
Claimant Identification.....	-		
Claims Processing.....	-		
Web Site Maintenance/Call Center.....	-		
4. Fund Administrator Bond	-		
5. Miscellaneous	-		
6. Federal Account for Investor Restitution (FAIR) Reporting Expenses	-		
<i>Total Plan Implementation Expenses</i>		-	
Total Disbursements for Distribution Expenses Paid by the Fund			-
Disbursements to Court/Other:			
<i>Investment Expenses/Court Registry Investment System (CRIS) Fees</i>	-		
<i>Federal Tax Payments</i>	-		
Total Disbursements to Court/Other:			-
Total Funds Disbursed:			11,435.02
Ending Balance (As of 10/31/2017):			7,589,531.88

Note:

The total amount of the ending balance in this report, the receiver is holding restricted funds of \$2,011,971.85 in reference to the turn over of funds from Celtic Bank.

Receiver:

By: _____
 (Signature)
 Stephen J. Donell
 (Printed Name)

Date: _____

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 18 and not a party to the within action. My business address is 865 S. Figueroa Street, Suite 2800, Los Angeles, California 90017-2543.

A true and correct copy of the foregoing document(s) described below will be served in the manner indicated below:

DECLARATION OF RECEIVER, STEPHEN J. DONELL, IN SUPPORT OF FIFTH INTERIM APPLICATION FOR PAYMENTS OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER AND HIS PROFESSIONALS

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")** – the above-described document will be served by the Court via NEF. On **December 19, 2017**, I reviewed the CM/ECF Mailing Info For A Case for this case and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

- **Zachary T. Carlyle**
carlylez@sec.gov,kasperg@sec.gov,karpeli@sec.gov,
blomgrene@sec.gov,pinkstonm@sec.gov,NesvigN@sec.gov
- **Stephen J. Donell**
jdelcastillo@allenmatkins.com
- **Mark T. Hiraide**
mth@msk.com,kjue@phlcorplaw.com,
hitabashi@phlcorplaw.com,eganous@phlcorplaw.com
- **Leslie J. Hughes**
hughesLJ@sec.gov,kasperg@sec.gov,pinkstonm@sec.gov,
nesvign@sec.gov
- **George D. Straggas**
George.straggas@straggasdean.com;sarah.borghese@straggasdean.com,
eric.dean@straggasdean.com
- **David J. Van Havermaat**
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- **Joshua Andrew del Castillo**
jdelcastillo@allenmatkins.com

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- **David R Zaro**
dzaro@allenmatkins.com

2. **SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served):** On **December 19, 2017**, I served the following person(s) and/or entity(ies) in this case by placing a true and correct copy thereof in a sealed envelope(s) addressed as indicated below. I am readily familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it is deposited with the U.S. postal service on that same day in the ordinary course of business. I am aware that on motion for party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 (one) day after date of deposit for mailing in affidavit. Or, 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.

Franchise Tax Board (FTB)
P.O. Box 2952
Sacramento, CA 95812-2952

Via U.S. Mail

Internal Revenue Service
880 Front Street
San Diego, CA 92101-8869

Via U.S. Mail

I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on **December 19, 2017** at Los Angeles, California.

/s/ Martha Diaz
Martha Diaz