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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 SECURITIES AND EXCHANGE
11 COMMISSION,

12 Plaintiff,

13 vs.

14 LOUIS V. SCHOOLER and FIRST
15 FINANCIAL PLANNING CORPORATION
d/b/a WESTERN FINANCIAL PLANNING
16 CORPORATION,

17 Defendants.

Case No. 12 CV 2164 GPC JMA

**NOTICE OF FILING OF PLAINTIFF
SECURITIES AND EXCHANGE
COMMISSION'S RESPONSES TO
DEFENDANTS' OBJECTIONS TO THE
COMMISSION'S PROPOSED
PRELIMINARY INJUNCTION ORDER AND
ORDER APPOINTING THOMAS C.
HEBRANK PERMANENT RECEIVER**

18
19 **TO THE CLERK OF THE COURT, DEFENDANTS AND THEIR COUNSEL OF**
20 **RECORD:**

21 **PLEASE TAKE NOTICE** that, pursuant to the Court's Order issued on January 11,
22 2013, Plaintiff Securities and Exchange Commission hereby files its Responses to Defendants'
23 Objections to its Proposed Preliminary Injunction Order and Order Appointing Thomas C.
24 Hebrank Permanent Receiver, a copy of which is attached hereto.

25 Dated: January 18, 2013

Respectfully submitted,

26
27 /s/ Sam S. Puathasnanon

Attorney for Plaintiff
28 Securities and Exchange Commission

PROOF OF SERVICE

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION, 5670 Wilshire Boulevard, 11th Floor, Los Angeles, California 90036-3648

Telephone No. (323) 965-3998; Facsimile No. (323) 965-3908.

On January 18, 2013, I caused to be served the document entitled **NOTICE OF FILING OF PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S RESPONSES TO DEFENDANTS' OBJECTIONS TO THE COMMISSION'S PROPOSED PRELIMINARY INJUNCTION ORDER AND ORDER APPOINTING THOMAS C. HEBRANK PERMANENT RECEIVER** on all the parties to this action addressed as stated on the attached service list:

OFFICE MAIL: By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency's practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

PERSONAL DEPOSIT IN MAIL: By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

EXPRESS U.S. MAIL: Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

HAND DELIVERY: I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

UNITED PARCEL SERVICE: By placing in sealed envelope(s) designated by United Parcel Service ("UPS") with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

ELECTRONIC MAIL: By transmitting the document by electronic mail to the electronic mail address as stated on thpoe attached service list.

E-FILING: By causing the document to be electronically filed via the Court's CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

FAX: By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

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

Date: January 18, 2013

/s/ Sam S. Puathasnanon
Sam S. Puathasnanon

1 **SEC v. Louis V. Schooler, et al.**
2 **United States District Court – Southern District of California**
3 **Case No. 12 CV 2164 LAB JMA**
4 **(LA-4059)**

5 **SERVICE LIST**

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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 SECURITIES AND EXCHANGE
11 COMMISSION,

12 Plaintiff,

13 vs.

14 LOUIS V. SCHOOLER and FIRST
FINANCIAL PLANNING CORPORATION
15 d/b/a WESTERN FINANCIAL PLANNING
CORPORATION,

16 Defendants.
17

Case No. 12 CV 2164 GPC JMA

**PLAINTIFF SECURITIES AND EXCHANGE
COMMISSION'S RESPONSES TO
DEFENDANTS' OBJECTIONS TO THE
COMMISSION'S PROPOSED
PRELIMINARY INJUNCTION ORDER AND
ORDER APPOINTING THOMAS C.
HEBRANK PERMANENT RECEIVER**

1 On November 30, 2012, the Court issued its Order Regarding the Receiver's Second
2 Report and Proposal. Dkt. No. 59. Among other things, the Court ordered Plaintiff Securities
3 and Exchange Commission (the "Commission") to lodge and serve, within seven days, a
4 proposed preliminary injunction order consistent with the Court's November 30, 2012 Order.
5 On December 7, 2012, the Commission did so.

6 Counsel for the parties then engaged in a lengthy meet and confer process in an attempt
7 to resolve the Defendants' objections to the Commission's proposed order. The parties could not
8 mutually resolve some of these objections. So, on December 24, 2012, Defendants lodged their
9 objections and suggested changes to the Commission's proposed preliminary injunction order.
10 *See* Defendants' Objections to the Commission's Proposed Preliminary Injunction Order and
11 Order Appointing Thomas C. Hebrank Permanent Receiver ("Defendants' Objections"). The
12 Defendants object to 13 parts of the Commission's proposed order. *See* Defendants' Objections,
13 at pp. 4-8. The following sets forth the Commission's responses to each of these. During the
14 meet and confer process, defense counsel did not initially raise certain of these objections, and
15 later mentioned them generally, indicating they would be more specifically addressed in the
16 objections Defendants planned to lodge with the Court. As reflected below, the Commission is
17 willing to accept many of those changes. The Receiver has also submitted the Receiver's
18 Response to Objections to Proposed Preliminary Injunction Order ("Receiver's Response"),
19 which is referred to below.

20 The Commission has attached as Exhibit A a copy of a redlined document showing the
21 changes the Commission is proposing or willing to accept in its originally filed proposed order.

22 **1. Page 1, Preamble paragraphs B, C, and D**

23 Defendants object to opening paragraphs B, C and D of the Commission's proposed
24 order, which summarizes the Court's findings to issue the preliminary injunction.

25 The Commission does not consent to the Defendants' proposed changes to paragraphs C
26 and D. Given the analysis set forth in the Court's October 5, 2012 Order, the Commission
27 recognizes that the language of the Commission's standard preliminary injunction order should
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1 be modified in this case. Toward that end, the Commission agrees with the Defendants'
2 proposed change to paragraph B of the opening paragraph of the order, which is as follows
3 (redlined and underlined to show deletions and insertions, respectively):

4 *B. ~~Good cause exists to believe~~ Plaintiff Securities and Exchange
5 Commission has established a prima facie case that Defendants Louis V.
6 Schooler (“Schooler”) and First Financial Planning Corporation d/b/a
7 Western Financial Planning Corporation (“Western”), and each of them,
8 have engaged in, are engaging in, and are about to engage in transactions,
9 acts, practices and courses of business that constitute violations of
10 Sections 5(a) and 5(c) of the Securities Act of 1933 (“Securities Act”), 15
11 U.S.C. §§ 77e(a) & 77e(c).*

12 Defendants’ proposed changes to paragraphs C and D, however, do not accurately set
13 forth the standard for preliminary injunctions, as already applied by this Court. Nor do these
14 changes accurately reflect the Court’s ultimate finding. Instead, the Commission proposes that
15 Paragraphs C and D be replaced with the following:

16 *C. The Commission has established a reasonable likelihood that the*
17 *violations of defendants Schooler and Western will be repeated unless they*
18 *are restrained and enjoined.*

19 **2. Page 1, Section I**

20 Defendants seek to change the language in this section of the Commission’s proposed
21 order to state that the Commission’s request for preliminary injunction is granted in part and
22 denied in part.

23 The Court should reject the Defendants’ proposed change to this section. Defendants
24 incorrectly state that the Court denied the Commission’s request for a preliminary injunction on
25 the fraud claims for relief. The Court did not analyze or make a finding with respect to the
26 Commission’s fraud claims.

1 **3. Page 3, Section IV, subparagraph A**

2 Defendants propose a number of changes to Section IV of the Commission’s proposed
3 order, which concerns the scope of authority of the Receiver. Their first proposal concerns
4 subparagraph A, which concerns the Receiver’s power to enter and secure the office space of
5 Defendant Western. The Commission consents to this proposed change by Defendants.

6 **4. Page 4, Section IV, subparagraph E**

7 Also in Section IV, Defendants propose that the Receiver make his accounting only to the
8 Court. For the purposes of this action only, the Commission does not object to this change.

9 Defendants further request that the Receiver’s accounting be filed under seal. The
10 Commission disagrees. As set forth in the Receiver’s Response, the defrauded investors should
11 have access to the accounting report because they each have a significant financial stake in the
12 receivership estate.

13 **5. Page 5, Section IV, subparagraph J (and Commission Section VII)**

14 Defendants suggest that language be added to the Commission’s proposed order in order
15 to protect Defendants’ purported right to defend Western in this action.

16 The Commission opposes this change. Under 28 U.S.C. § 754, a receiver appointed in a
17 civil action involving property, real, personal, or mixed, is vested with “complete control of all
18 such property with the right take possession thereof.” *Phelps v. Ocean Shores Assocs., L.P.*,
19 2007 U.S. Dist. LEXIS 49235, at *12 (D. Wash., July 9, 2007). Here, the Court has appointed
20 Thomas Hebrank as Receiver, and Hebrank is therefore vested with complete control over
21 Western. While Schooler’s counsel formerly represented Western when Schooler controlled the
22 company, Schooler no longer controls the company, and the only individual who has any power
23 over the company is the Receiver, who is represented by his own counsel. To allow someone
24 other than the Receiver’s counsel to represent Western would not only cut against the statutory
25 rule providing a receiver with complete control over the property within his receivership, but it
26 would likely cause confusion among investors, creditors of Western and other third parties.

27 In addition, Defendants have provided no compelling argument for the Court to allow
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1 Schooler's counsel to continue representing Western, nor do they cite a single case supporting
2 their position. The Commission's complaint is based solely on Western's conduct while
3 Schooler was in control of the company, and Schooler can continue defending himself and the
4 actions he took as the sole owner and president of Western.

5 **6. Page 5, Renumbering Sections VII through XV**

6 Defendants propose a correction to a typographical error in the numbering of the
7 paragraphs in the Commission's proposed order. The Commission consents to this change.

8 **7. Pages 5-6, Commission's Section VIII (as corrected, Section VII)**

9 In the section of the order concerning the stay of litigation, Defendants propose that
10 Schooler be added to the stay.

11 The Commission opposes such an expansion of the stay. As the Court made clear in its
12 November 30, 2012 Order, Schooler is not part of the receivership. Dkt. No. 59, pp. 11-12. As
13 such, the Court lacks the jurisdiction or authority, even in equity, to stay litigation against
14 Schooler during the pendency of this action. Granted, in its application for temporary restraining
15 order, the Commission sought a litigation stay that included Schooler and Western to preserve
16 the status quo and prevent the dissipation of assets during the short period in which the TRO
17 would be in effect. The policy supporting that request does not apply here, where a permanent
18 receiver has been appointed and the Court has lifted the freeze on Mr. Schooler's assets.
19 Preventing clients, investors, claimants, or others similarly situated from filing actions against
20 Schooler during the entirety of this action would be an unduly burdensome and overly broad
21 restriction on the rights of third parties to this litigation.

22 **8. Page 6, Commission's Section IX (as corrected, Section VIII)**

23 The Commission consents to Defendants' proposed change, which replaces "including
24 but not limited to" with "and" when referring to the entities listed in Schedules 1 and 2 of the
25 order.

26 **9. Page 7, Commission's Section X (as corrected, Section IX)**

27 Defendants propose that applications for fees, costs and expenses should be filed "no less
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1 frequently than monthly.” The Commission consents to this change.

2 **10. Page 7, Commission’s XI (as corrected, Section X)**

3 Defendants propose that the receiver post a \$10 million bond and that the standard of care
4 should be mere negligence.

5 The Commission opposes this proposed amendment to the order. For the reasons
6 discussed in the Receiver’s Response, the Commission agrees that the Receiver should not be
7 required to post a bond. The Commission also believes that the standard of care should remain
8 gross negligence.

9 **11. Pages 7-8, Commission’s Section XII (as corrected, Section XI)**

10 In their objection, Defendants focus most on their suggested change to the section of the
11 proposed order regarding the Commission’s access to Western’s books and records. (The
12 entirety of section I of the Defendants’ objection addresses this one proposed change.) With
13 their proposal, Defendants ask the Court to preclude the Commission from having any authority
14 to inspect or copy Western’s documents except as provided for under the Federal Rules of Civil
15 Procedure.

16 The Commission opposes this suggested change. The restriction proposed by Defendants
17 is overly broad. The Court has ordered Western into receivership, under the management of
18 Thomas Hebrank, who has retained his own counsel, which, by extension, serves as counsel for
19 Western. The broad prohibition sought by Defendants would prevent the Receiver from
20 voluntarily sharing any information with the Commission pre-discovery, even in instances where
21 the Commission has not made a request.

22 Moreover, this is not the typical civil case with ordinary litigants. The Commission is an
23 agency tasked with enforcing the federal securities laws. The Commission requested a
24 receivership in equity as part of an enforcement action. The purpose of receiverships in
25 enforcement actions is to preserve the assets of defrauded investors. *See SEC v. Wencke*, 783
26 F.2d 829, 836-37 n.9 (9th Cir. 1986). The Commission selected and proposed Mr. Hebrank to
27 serve as temporary and permanent receiver, which the Court approved. The Court ordered the
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1 receivership upon the Commission's establishment of a prima facie case that defendants violated
2 the federal securities laws. Neither the Commission, nor Western, because it is in receivership,
3 is an ordinary litigant. Giving the Commission the authority to inspect and copy Western's
4 documents is a natural extension of the Commission's enforcement responsibilities.

5 This authority does not circumvent or replace the Federal Rules of Civil Procedure; it
6 merely works in parallel with them. Indeed, the Commission has not asked the Court to exempt
7 it from the Federal Rules of Civil Procedure. It has merely asked that it have access to the
8 documents of the receivership entity, an entity that violated the federal securities laws. In
9 addition, providing access to the documents would not undermine the Receiver's independence
10 in this action. The Receiver's power would still be subject to the Court's authority, not the
11 Commission.

12 **12. Page 8, Commission's Section XIII (as corrected, Section XII)**

13 Defendants propose the same change in language that they propose to re-numbered
14 Section VIII (*see* item no. 8 above). The Commission consents to this change.

15 **13. Schedule 2, List of Accounts Subject to the Receivership**

16 Finally, Defendants seek to remove Real Asset Locators, Inc. ("RAL") from the list of
17 entities included within the receivership because RAL is not a subsidiary of Western nor does it
18 fall within the definition of affiliate.

19 The Commission objects to removing RAL from the list of entities. There is a nexus
20 between RAL and Western that justifies RAL's inclusion in the receivership. RAL received
21 significant investor funds from Western, and also paid Schooler large sums of money. In
22 addition, RAL often uses Western's address as its own business address and, as Defendants
23 acknowledge (*see* Defendants' Objection at p. 7), Schooler serves as an officer of RAL. Finally,
24 Schooler and two former Western employees were authorized signatories to the RAL bank
25 account. Attached hereto as Exhibit B is a true and correct copy of the signature card for RAL's
26 bank account at Bank of Nevada. The Commission has additional bank records evidencing
27 Western's significant involvement in RAL's business operations, as well as the flow of funds
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1 between Western, RAL, and Schooler, and can provide them at the Court's request.

2 Based on Western's involvement with RAL and the flow of funds between the entities, it
3 is the Commission's position that leaving RAL in the receivership will help preserve any
4 investor funds remaining in the account while the Receiver conducts his forensic investigation.

5
6 Dated: January 7, 2013

Respectfully submitted,

7
8 /s/ Sara Kalin

Sara Kalin
Attorney for Plaintiff
Securities and Exchange Commission

SEC v. Louis V. Schooler and First Financial Planning Corporation
U.S.D.C. S.D. California

Index to Plaintiff's Responses to Defendants' Objections to Its Proposed Preliminary Injunction Order and Order Appointing Thomas C. Hebrank Permanent Receiver

Exhibit No.	Description	Page
A	Redlined proposed Preliminary Injunction Order and Order Appointing Thomas C. Hebrank Permanent Receiver	1
B	Signature card for Real Asset Locators, Inc.'s bank account at Bank of Nevada	18

EXHIBIT A

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

LOUIS V. SCHOOLER and FIRST
FINANCIAL PLANNING CORPORATION
d/b/a WESTERN FINANCIAL PLANNING
CORPORATION,

Defendants.

Case No. 12 CV 2164 GPC JMA

**PRELIMINARY INJUNCTION ORDER AND
ORDER APPOINTING THOMAS C.
HEBRANK PERMANENT RECEIVER**

1 This matter came before the Court upon an Order to Show Cause Re Preliminary
2 Injunction and the Receiver's Second Report and Proposal Regarding the Assets of Western and
3 Louis Schooler. The Court, having considered the evidence and argument presented to the Court
4 in this matter, finds that:

- 5 A. This Court has jurisdiction over the parties to, and the subject matter of, this
6 action.
- 7 B. ~~Good cause exists to believe~~Plaintiff Securities and Exchange Commission has
8 established a prima facie case that Defendants Louis V. Schooler ("Schooler") and
9 First Financial Planning Corporation d/b/a Western Financial Planning
10 Corporation ("Western"), and each of them, have engaged in, are engaging in, and
11 are about to engage in transactions, acts, practices and courses of business that
12 constitute violations of Sections 5(a) and 5(c) of the Securities Act of 1933
13 ("Securities Act"), 15 U.S.C. §§ 77e(a) & 77e(c).
- 14 C. ~~The Securities and Exchange Commission ("Commission") has~~
15 ~~demonstrated~~established a probability of success on the merits in this action.
- 16 D. ~~Good cause exists to believe~~reasonable likelihood that the violations of defendants
17 Schooler and Western (collectively "Defendants") will continue to engage in such
18 violations to the immediate and irreparable loss and damage to investors and to the
19 general publicbe repeated unless they are restrained and enjoined.

20 **I.**

21 IT IS HEREBY ORDERED that the Commission's request for a preliminary injunction
22 and for appointment of a permanent receiver is GRANTED.

23 **II.**

24 IT IS FURTHER ORDERED that Schooler and Western, and their officers, agents,
25 servants, employees, attorneys, subsidiaries and affiliates, and those persons in active concert or
26 participation with any of them who receive actual notice of this Order, by personal service or
27 otherwise, and each of them, be and hereby are preliminarily enjoined from, directly or
28 indirectly, in the absence of any applicable exemption:

1 (a) Unless a registration statement is in effect as to a security, making use of any
2 means or instruments of transportation or communication in interstate commerce
3 or of the mails to sell such security through the use or medium of any prospectus
4 or otherwise;

5 (b) Unless a registration statement is in effect as to a security, carrying or causing to
6 be carried through the mails or in interstate commerce, by any means or
7 instruments of transportation, any such security for the purpose of sale or for
8 delivery after sale; or

9 (c) Making use of any means or instruments of transportation or communication in
10 interstate commerce or of the mails to offer to sell or offer to buy through the use
11 or medium of any prospectus or otherwise any security, unless a registration
12 statement has been filed with the Commission as to such security, or while the
13 registration statement is the subject of a refusal order or stop order or (prior to the
14 effective date of the registration statement) any public proceeding or examination
15 under Section 8 of the Securities Act, 15 U.S.C. § 77h.

16 in violation of Section 5 of the Securities Act, 15 U.S.C. § 77e.

17 **III.**

18 IT IS FURTHER ORDERED that, except as otherwise ordered by this Court, defendants
19 Schooler and Western, and their officers, agents, servants, employees, attorneys, subsidiaries,
20 and affiliates, and those persons in active concert with them, who receive actual notice of this
21 Order, by personal service or otherwise, and each of them, be and hereby are preliminarily
22 enjoined from, directly or indirectly, transferring, assigning, selling, hypothecating, changing,
23 wasting, dissipating, converting, concealing, encumbering, or otherwise disposing of, in any
24 manner, any funds, assets, securities, claims or other real or personal property, including any
25 notes or deeds of trust or other interest in real property, wherever located, of Western, its
26 subsidiaries, or the entities listed on Schedule 1 and Schedule 2, owned by, controlled by,
27 managed by or in the possession or custody of any of them and from transferring, encumbering
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1 dissipating, incurring charges or cash advances on any debit or credit card of the credit
2 arrangement of Western, its subsidiaries, or the entities listed on Schedule 1 and Schedule 2.

3 IV.

4 IT IS FURTHER ORDERED that Thomas C. Hebrank is appointed as permanent
5 receiver of Western, its subsidiaries, and the entities listed on Schedule 1, with full powers of an
6 equity receiver, including, but not limited to, full power over all funds, assets, collateral,
7 premises (whether owned, leased, occupied, or otherwise controlled), choses in action, books,
8 records, papers and other property belonging to, being managed by or in the possession of or
9 control of Western, its subsidiaries, or the entities listed on Schedule 1, and that such receiver is
10 immediately authorized, empowered and directed:

11 A. to have access to and to collect and take custody, control, possession, and charge
12 of all funds, assets, collateral, premises (whether owned, leased, occupied, or
13 otherwise controlled), choses in action, books, records, papers and other real or
14 personal property, wherever located, of or managed by Western, its subsidiaries,
15 or the entities listed on Schedule 1, with full power to sue, foreclose, marshal,
16 collect, receive, and take into possession all such property including access to and
17 taking custody, control, and possession of all such Western property, and that of
18 its subsidiaries or the entities listed on Schedule 1; the permanent receiver shall
19 have authority to enter and secure only that portion of the premises located at
20 5186 Carroll Canyon Road, San Diego, CA 92121, that is leased, used by, or in
21 the custody, control, or possession of Western, its subsidiaries, or the entities
22 listed on Schedule 1, including by locksmith and change of key;

23 B. to have control of, and to be added as the sole authorized signatory for, all
24 accounts of the entities in receivership or otherwise listed on Schedule 1 or
25 Schedule 2, including all accounts at any bank, title company, escrow agent,
26 financial institution or brokerage firm (including any futures commission
27 merchant) (1) which has possession, custody or control of any assets or funds of
28 Western, its subsidiaries, or the entities listed on Schedule 1 or Schedule 2, or (2)

1 which maintains accounts over which Western, its subsidiaries, or the entities
2 listed on Schedule 1 or Schedule 2, and/or any of their employees or agents have
3 signatory authority;

4 C. to conduct such investigation and discovery as may be necessary to locate and
5 account for all of the assets of or managed by Western, its subsidiaries, or the
6 entities listed on Schedule 1 and Schedule 2, and to engage and employ attorneys,
7 accountants and other persons to assist in such investigation and discovery;

8 D. to take such action as is necessary and appropriate to preserve and take control of
9 and to prevent the dissipation, concealment, or disposition of any assets of or
10 managed by Western, its subsidiaries, or the entities listed on Schedule 1 and
11 Schedule 2;

12 E. to make an accounting, as soon as practicable, to this Court ~~and the Commission~~
13 of the assets and financial condition of Western and to file the accounting with the
14 Court and deliver copies thereof to all parties;

15 F. to make such payments and disbursements from the funds and assets taken into
16 custody, control, and possession or thereafter received by him, and to incur, or
17 authorize the making of, such agreements as may be necessary and advisable in
18 discharging his duties as permanent receiver;

19 G. to employ attorneys, accountants, and others to investigate and, where
20 appropriate, to institute, pursue, and prosecute all claims and causes of action of
21 whatever kind and nature which may now or hereafter exist as a result of the
22 activities of present or past employees or agents of Western, its subsidiaries, or
23 the entities listed on Schedule 1 and Schedule 2; and

24 H. to have access to and monitor all mail, electronic mail, and video phone of the
25 entities in receivership in order to review such mail, electronic mail, and video
26 phone which he or she deems relates to their business and the discharging of his
27 duties as permanent receiver;

- 1 I. to operate and control the content of information posted on any Internet website
2 maintained by Western, its subsidiaries, and the entities listed on Schedule 1; and
3 J. to exercise all the lawful powers of Western, its subsidiaries, and the entities
4 listed on Schedule 1, and their officers, directors, employees, representatives,
5 partners, or persons who exercise similar powers and perform similar duties.

6 **V.**

7 IT IS FURTHER ORDERED that defendant Western, its subsidiaries, and the entities
8 listed on Schedule 1, and their officers, agents, servants, employees and attorneys, and any other
9 persons who are in custody, possession or control of any assets, collateral, books, records, papers
10 or other property of or managed by any of the entities in receivership, shall forthwith give access
11 to and control of such property to the permanent receiver.

12 **VHVI.**

13 IT IS FURTHER ORDERED that no officer, agent, servant, employee or attorney of
14 Western, its subsidiaries, and the entities listed on Schedule 1, shall take any action or purport to
15 take any action, in the name of or on behalf of Western, its subsidiaries, and the entities listed on
16 Schedule 1, without the written consent of the permanent receiver or order of this Court.

17 **VHVII.**

18 IT IS FURTHER ORDERED that, except by leave of this Court, during the pendency of
19 this receivership, all clients, investors, trust beneficiaries, note holders, creditors, claimants,
20 lessors and all other persons or entities seeking relief of any kind, in law or in equity, from
21 Western, its subsidiaries, or the entities listed on Schedule 1 and Schedule 2, and all persons
22 acting on behalf of any such investor, trust beneficiary, note holder, creditor, claimant, lessor,
23 consultant group or other person, including sheriffs, marshals, servants, agents, employees and
24 attorneys, are hereby restrained and enjoined from, directly or indirectly, with respect to these
25 persons and entities:

- 26 A. commencing, prosecuting, continuing or enforcing any suit or proceeding (other
27 than the present action by the Commission or any other action by the government)
28 against any of them;

- 1 B. using self-help or executing or issuing or causing the execution or issuance of any
2 court attachment, subpoena, replevin, execution or other process for the purpose
3 of impounding or taking possession of or interfering with or creating or enforcing
4 a lien upon any property or property interests owned by or in the possession of
5 Western, its subsidiaries, or the entities listed on Schedule 1 and Schedule 2; and
6 C. doing any act or thing whatsoever to interfere with taking control, possession or
7 management by the permanent receiver appointed hereunder of the property and
8 assets owned, controlled or managed by or in the possession of Western, its
9 subsidiaries, or the entities listed on Schedule 1 and Schedule 2, or in any way to
10 interfere with or harass the permanent receiver or his attorneys, accountants,
11 employees, or agents or to interfere in any manner with the discharge of the
12 permanent receiver's duties and responsibilities hereunder.

13 **IXVIII.**

14 IT IS FURTHER ORDERED that defendants Schooler and Western, and their
15 subsidiaries, affiliates, officers, agents, servants, employees and attorneys, ~~including but not~~
16 ~~limited to~~ and the entities listed on Schedule 1 and Schedule 2, shall cooperate with and assist the
17 permanent receiver and shall take no action, directly or indirectly, to hinder, obstruct, or
18 otherwise interfere with the permanent receiver or his attorneys, accountants, employees or
19 agents, in the conduct of the permanent receiver's duties or to interfere in any manner, directly or
20 indirectly, with the custody, possession, management, or control by the permanent receiver of the
21 funds, assets, collateral, premises, and choses in action described above.

22 **XIX.**

23 IT IS FURTHER ORDERED that defendant Western, its subsidiaries, and the entities
24 listed on Schedule 1 and Schedule 2, shall pay the costs, fees and expenses of the permanent
25 receiver incurred in connection with the performance of his duties described in this Order,
26 including the costs and expenses of those persons who may be engaged or employed by the
27 permanent receiver to assist him in carrying out his duties and obligations. All applications for
28 costs, fees, and expenses for services rendered in connection with the receivership other than

1 routine and necessary business expenses in conducting the receivership, such as salaries, rent,
2 and any and all other reasonable operating expenses, shall be made by application setting forth in
3 reasonable detail the nature of the services and shall be heard by the Court, such applications to
4 be filed with the Court no less frequently than monthly.

5 **XIX.**

6 IT IS FURTHER ORDERED that no bond shall be required in connection with the
7 appointment of the permanent receiver. Except for an act of gross negligence, the permanent
8 receiver shall not be liable for any loss or damage incurred by any of the defendants, their
9 officers, agents, servants, employees and attorneys or any other person, by reason of any act
10 performed or omitted to be performed by the permanent receiver in connection with the
11 discharge of his duties and responsibilities.

12 **XXI.**

13 IT IS FURTHER ORDERED that representatives of the Commission and any other
14 government agency are authorized to have continuing access to inspect or copy any or all of the
15 corporate books and records and other documents of Western and the other entities in
16 receivership, and continuing access to inspect their funds, property, assets and collateral,
17 wherever located.

18 **XXII.**

19 IT IS FURTHER ORDERED that, except as otherwise ordered by this Court, defendants
20 Schooler and Western, and their officers, agents, servants, employees, attorneys, subsidiaries and
21 affiliates, ~~including but not limited to~~ and the entities listed on Schedule 1 and Schedule 2, and
22 those persons in active concert or participation with any of them, who receive actual notice of
23 this Order, by personal service or otherwise, and each of them, be and hereby are preliminarily
24 enjoined from, directly or indirectly: destroying, mutilating, concealing, transferring, altering, or
25 otherwise disposing of, in any manner, any documents, which includes all books, records,
26 computer programs, computer files, computer printouts, contracts, emails, correspondence,
27 memoranda, brochures, or any other documents of any kind in their possession, custody or
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1 control, however created, produced, or stored (manually, mechanically, electronically, or
2 otherwise), pertaining in any manner to defendants Schooler and/or Western.

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1 XIVXIII.

2 IT IS FURTHER ORDERED that any person who receives actual notice of this Order by
3 personal service or otherwise, and who holds, possesses or controls assets exceeding \$5,000 for
4 the account or benefit of Western, shall within 5 days of receiving actual notice of this Order
5 provide counsel for the Commission with a written statement identifying all such assets, the
6 value of such assets, or best approximation thereof, and any account number(s) or account
7 name(s) in which the assets are held.

8 XVXIV.

9 IT IS FURTHER ORDERED that this Court shall retain jurisdiction over this action for
10 the purpose of implementing and carrying out the terms of all orders and decrees which may be
11 entered herein and to entertain any suitable application or motion for additional relief within the
12 jurisdiction of this Court.

13
14 IT IS SO ORDERED.

15
16 DATED: ~~December~~ 2012 ~~January~~ 2013

17 _____
18 HONORABLE GONZALO P. CURIEL
19 UNITED STATES DISTRICT JUDGE
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SCHEDULE 2

<u>Bank Name</u>	<u>Account Name</u>	<u>Account Number</u>
Security Business Bank of San Diego	A B L Partners	XXXXXX7267
Security Business Bank of San Diego	Antelope Springs Partners	XXXXXX7606
Security Business Bank of San Diego	Big Ranch Partners	XXXXXX7390
Security Business Bank of San Diego	BLA Partners	XXXXXX6558
Security Business Bank of San Diego	Borderland Partners	XXXXXX6566
Security Business Bank of San Diego	Bratton View Partners	XXXXXX6574
Security Business Bank of San Diego	Cactus Ridge Partners	XXXXXX1540
Security Business Bank of San Diego	Carson Valley Partners	XXXXXX6608
Security Business Bank of San Diego	Checkered Flag Partners	XXXXXX6616
Security Business Bank of San Diego	Clearwater Bridge	XXXXXX6069
Security Business Bank of San Diego	Comstock Partners	XXXXXX8463
Security Business Bank of San Diego	Crystal Clearwater	XXXXXX6051
Security Business Bank of San Diego	Dayton View Partners	XXXXXX6426
Security Business Bank of San Diego	Desert View Partners	XXXXXX2143
Security Business Bank of San Diego	Eagle View Partners	XXXXXX1847
Security Business Bank of San Diego	Eagle View Partners	XXXXXX1854
Security Business Bank of San Diego	Fairway Partners	XXXXXX6418

	<u>Bank Name</u>	<u>Account Name</u>	<u>Account Number</u>
1	San Diego		
2	Security Business Bank of San Diego	Falcon Heights Partners	XXXXXX2167
3	Security Business Bank of San Diego	Falcon Heights Partners, LLC	XXXXXX2175
4	Security Business Bank of San Diego	Fernley I, LLC	XXXXXX5970
5	Security Business Bank of San Diego	Free Trade Partners	XXXXXX6392
6	Security Business Bank of San Diego	Frontage 177 Partners	XXXXXX5327
7	Security Business Bank of San Diego	Frontage 177 Partners, LLC	XXXXXX5335
8	Security Business Bank of San Diego	Galena Ranch Partners	XXXXXX1541
9	Security Business Bank of San Diego	Gila View Partners	XXXXXX1210
10	Security Business Bank of San Diego	Gold Ridge Partners	XXXXXX9792
11	Security Business Bank of San Diego	Grand View Partners	XXXXXX0667
12	Security Business Bank of San Diego	Green View Partners	XXXXXX6384
13	Security Business Bank of San Diego	Heavenly View Partners	XXXXXX6285
14	Security Business Bank of San Diego	Hidden Hills Partners	XXXXXX9180
15	Security Business Bank of San Diego	High Desert Partners	XXXXXX6085
16	Security Business Bank of San Diego	High Desert Shadow, LLC	XXXXXX6093
17	Security Business Bank of San Diego	Highway 50 Partners	XXXXXX1698
18	Security Business Bank of San Diego	Hollywood Partners	XXXXXX6301
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	<u>Bank Name</u>	<u>Account Name</u>	<u>Account Number</u>
1			
2	Security Business Bank of San Diego	Honey Springs Partners	XXXXXX6319
3			
4	Security Business Bank of San Diego	Horizon Partners	XXXXXX6293
5	Security Business Bank of San Diego	International Partners	XXXXXX9941
6			
7	Security Business Bank of San Diego	Jamul Meadows Partners	XXXXXX6343
8	Security Business Bank of San Diego	Lahontan Partners	XXXXXX1227
9			
10	Security Business Bank of San Diego	Las Vegas Partners	XXXXXX9982
11	Security Business Bank of San Diego	Lyons Valley Partners	XXXXXX6350
12			
13	Security Business Bank of San Diego	Mesa View Partners	XXXXXX1268
14	Security Business Bank of San Diego	Mex-Tec Partners	XXXXXX6368
15			
16	Security Business Bank of San Diego	Mohawk Mountain Partners	XXXXXX1680
17	Security Business Bank of San Diego	Mountain View Partners	XXXXXX1466
18			
19	Security Business Bank of San Diego	Nevada View Partners	XXXXXX9073
20	Security Business Bank of San Diego	Night Hawk Partners, LLC	XXXXXX3793
21			
22	Security Business Bank of San Diego	Night Hawk Partners	XXXXXX3801
23	Security Business Bank of San Diego	North Springs Partners	XXXXXX1425
24			
25	Security Business Bank of San Diego	Ocotillo View Partners	XXXXXX1482
26	Security Business Bank of San Diego	Orange Vista Partners	XXXXXX1946
27			
28	Security Business Bank of San Diego	Osprey Partners	XXXXXX4809

	<u>Bank Name</u>	<u>Account Name</u>	<u>Account Number</u>
1			
2	Security Business Bank of San Diego	Osprey Pescador, LLC	XXXXXX4817
3			
4	Security Business Bank of San Diego	P-39 Aircobra Partners, LLC	XXXXXX6366
5	Security Business Bank of San Diego	P-39 Aircobra Partners	XXXXXX6358
6			
7	Security Business Bank of San Diego	P51 LLC	XXXXXX6002
8	Security Business Bank of San Diego	Painted Desert Partners	XXXXXX1343
9			
10	Security Business Bank of San Diego	Par Four Partners	XXXXXX6236
11	Security Business Bank of San Diego	Park Vegas Partners	XXXXXX9933
12			
13	Security Business Bank of San Diego	Pecos Partners	XXXXXX4627
14	Security Business Bank of San Diego	Pecos Partners, LLC	XXXXXX4635
15			
16	Security Business Bank of San Diego	Pine View	XXXXXX6590
17	Security Business Bank of San Diego	Production Partners	XXXXXX6459
18			
19	Security Business Bank of San Diego	Prosperity Partners	XXXXXX6442
20	Security Business Bank of San Diego	Pueblo Partners, LLC	XXXXXX2381
21			
22	Security Business Bank of San Diego	Pueblo Partners	XXXXXX2399
23	Security Business Bank of San Diego	Pyramid Highway 177 Partners	XXXXXX5244
24			
25	Security Business Bank of San Diego	Pyramid Highway 177 Partners, LLC	XXXXXX5251
26	Security Business Bank of San Diego	Rail Road Partners	XXXXXX1624
27			
28	Security Business Bank of San Diego	Rainbow Partners	XXXXXX6467

	<u>Bank Name</u>	<u>Account Name</u>	<u>Account Number</u>
1			
2	Security Business Bank of San Diego	Rawhide Partners	XXXXXX1557
3			
4	Security Business Bank of San Diego	Redfield Heights Partners	XXXXXX1616
5	Security Business Bank of San Diego	Reno Partners	XXXXXX6582
6			
7	Security Business Bank of San Diego	Reno View Partners	XXXXXX6277
8	Security Business Bank of San Diego	Reno Vista Partners	XXXXXX6517
9			
10	Security Business Bank of San Diego	Road Runner Partners	XXXXXX0021
11	Security Business Bank of San Diego	Rolling Hills View Partners	XXXXXX0931
12			
13	Security Business Bank of San Diego	Rose Vista Partners	XXXXXX1400
14	Security Business Bank of San Diego	Santa Fe Venture	XXXXXX1797
15			
16	Security Business Bank of San Diego	Santa Fe View Partners, LLC	XXXXXX2076
17	Security Business Bank of San Diego	Santa Fe View Partners	XXXXXX2084
18			
19	Security Business Bank of San Diego	SFV II, LLC	XXXXXX5020
20	Security Business Bank of San Diego	Sierra View Partners	XXXXXX6251
21			
22	Security Business Bank of San Diego	Silver City Partners	XXXXXX8695
23	Security Business Bank of San Diego	Silver State Partners	XXXXXX6269
24			
25	Security Business Bank of San Diego	Sky View Partners	XXXXXX0410
26	Security Business Bank of San Diego	Snow Bird Partners	XXXXXX1516
27			
28	Security Business Bank of San Diego	Sonora View Partners Partners	XXXXXX2150

	<u>Bank Name</u>	<u>Account Name</u>	<u>Account Number</u>
1			
2	Security Business Bank of San Diego	Spanish Springs View Partners	XXXXXX6525
3			
4	Security Business Bank of San Diego	Spruce Heights Partners	XXXXXX1749
5	Security Business Bank of San Diego	Steamboat Partners	XXXXXX1509
6			
7	Security Business Bank of San Diego	Storey Country Partners	XXXXXX7960
8	Security Business Bank of San Diego	Suntec Partners	XXXXXX6228
9			
10	Security Business Bank of San Diego	Tecate South Partners	XXXXXX7242
11	Security Business Bank of San Diego	Twin Plant Partners	XXXXXX6202
12			
13	Security Business Bank of San Diego	Valley Vista Partners	XXXXXX9164
14	Security Business Bank of San Diego	Via 188 Partners	XXXXXX6210
15			
16	Security Business Bank of San Diego	Victory Lap Partners	XXXXXX6491
17	Security Business Bank of San Diego	Vista Del Sur Partners	XXXXXX0943
18			
19	Security Business Bank of San Diego	Vista Tecate Partners	XXXXXX9958
20	Security Business Bank of San Diego	Western Financial Planning	XXXXXX7184
21			
22	Security Business Bank of San Diego	Western Financial Planning	XXXXXX8794
23	Security Business Bank of San Diego	Western Financial Planning	XXXXXX8802
24			
25	Security Business Bank of San Diego	Western Financial Planning	XXXXXX8810
26	Security Business Bank of San Diego	Western Financial Planning	XXXXXX8828
27			
28	Security Business Bank of San Diego	Western Financial Planning	XXXXXX8836

<u>Bank Name</u>	<u>Account Name</u>	<u>Account Number</u>
Security Business Bank of San Diego	Western Financial Planning	XXXXXX9883
Security Business Bank of San Diego	Western Financial Planning	XXXXXX1464
Security Business Bank of San Diego	Western Financial Planning; F-86 LLC	XXXXXX8354
Security Business Bank of San Diego	Western Financial Planning; F-86 Partners	XXXXXX8362
Security Business Bank of San Diego	Western Financial Planning; P-40 Warhawk	XXXXXX4510
Security Business Bank of San Diego	Western Financial Planning; Warhawk LLC	XXXXXX4544
Security Business Bank of San Diego	Wild Horse Partners	XXXXXX7234
Security Business Bank of San Diego	WSCC, LLC	XXXXXX8471
American Century Investments	First Financial Planning Corp.	XXXXX883-3
Bank of Nevada	Real Asset Locators, Inc.	XXXXXXXX6352

EXHIBIT B

Mar. 14. 2012 3:46PM OPS SUPPORT

No. 8464 P. 1

Signer's 1 through 4

WAL Tree Deposit Account Agreement

Date: 09/28/2009

Institution Name & Address

BANK OF NEVADA
10199 S. EASTERN AVENUE
LAS VEGAS, NV 89052

Internal Use **Account Number:** 6352

Account Title & Address

REAL ASSET LOCATORS, INC

P.O. BOX 4367
CARLSBAD, CA 92018

Ownership of Account

The specified ownership will remain the same for all accounts.

- Individual
- Joint with Survivorship (not as tenants in common or community property)
- Joint with No Survivorship (as tenants in common)
- Community Property (no survivorship)
- Trust-Separate Agreement Dated:
- Corporation - For Profit
- Corporation - Nonprofit
- Partnership
- Sole Proprietorship
- Limited Liability Company

IMPORTANT ACCOUNT OPENING INFORMATION: Federal law requires us to obtain sufficient information to verify your identity. You may be asked several questions and to provide one or more forms of identification to fulfill this requirement. In some instances we may use outside sources to confirm the information. The information you provide is protected by our privacy policy and federal law. Enter Non-Individual Owner Information on page 2. There is additional Owner/Signer Information space on page 2.

Owner/Signer Information 1

Name	LOUIS V SCHOOLER
Relationship to Account (Owner and/or Signer, etc.)	TREASURER/AUTH SIGNER
Address	5186 CARROLL CANYON RD, SAN DIEGO, CA 92121-1729
Mailing Address (if different)	
Home Phone	(858)
Work Phone	
Mobile Phone	
E-Mail	
Birth Date/Birth Place	7/1951 / PHOENIX AZ
SSN/TIN	2067
Gov't Issued Photo ID, Type, State, Number, Issue Date, Exp. Date	Drivers License CA CA DL I: 3/26/2007 E: 2012
Other ID (Description, Details)	
Employer & Occupation	Employer: WETERN FINANCIAL PLANNING CORP Occupation:
Mother's Maiden Name	STRUILAN

Owner/Signer Information 2

Name	PAULINE LESSMAN
Relationship to Account (Owner and/or Signer, etc.)	AUTH SIGNER
Address	5186 CARROLL CANYON RD, SAN DIEGO, CA 92121-1729
Mailing Address (if different)	
Home Phone	(858)
Work Phone	
Mobile Phone	
E-Mail	
Birth Date/Birth Place	1932 / LOS ANGELES CA
SSN/TIN	-7890
Gov't Issued Photo ID, Type, State, Number, Issue Date, Exp. Date	Drivers License CA CA DL I: 8/21/2003 E: /2008
Other ID (Description, Details)	
Employer & Occupation	Employer: WETERN FINANCIAL Occupation:
Mother's Maiden Name	TQMASIN

Beneficiary Designation

(Check appropriate ownership above.)

- Revocable Trust
- Pay-On-Death (POD)

Beneficiary Name(s), Address(es), and SSN(s)

(Check appropriate beneficiary designation above.)

If checked, this is a temporary account agreement.

Number of signatures required for withdrawal: ONE

Signature(s)

The undersigned authorize the financial institution to investigate credit and employment history and obtain reports from consumer reporting agency(ies) on them as individuals. Except as otherwise provided by law or other documents, each of the undersigned is authorized to make withdrawals from the account(s), provided the required number of signatures indicated above is satisfied. The undersigned personally and as, or on behalf of, the account owner(s) agree to the terms of, and acknowledge receipt of copy(ies) of, this document and the following:

- Terms and Conditions
- Privacy
- Electronic Fund Transfers
- Truth In Savings
- Substitute Checks
- Funds Availability
- Common Features
- Account Disclosure

[Signature]
LOUIS V SCHOOLER

[Signature]
PAULINE LESSMAN

[Signature]
ROBERT M SCHAFFER

[Signature]
DORRIE CHUNG

The authorized individuals signing this Agreement agree that the Accounts, whether opened concurrently with the execution of this Agreement or at a future date, with Bank of Nevada, First Independent Bank of Nevada, Alta Alliance Bank, Alliance Bank of Arizona, and/or Torrey Pines Bank (each a "Bank") will be governed by the terms set forth in the Deposit Agreement and Disclosures, as amended by the relevant Bank from time to time. The authorized individuals also acknowledge that they have received at least one copy of these account documents.

Mar. 14. 2012 3:46PM OPS SUPPORT

No. 8464 P. 2

Owner/Signer Information 3	
Name	ROBERT M SCHAFER
Relationship to Account (Owner and/or Signer, etc.)	PRESIDENT/SECRETARY/AUTH SIGNER
Address	5186 CARROLL CANYON RD, SAN DIEGO, CA 92121-1729
Mailing Address (if different)	
Home Phone	(760)
Work Phone	(760)-434-7571
Mobile Phone	
E-Mail	
Birth Date/Birth Place	1931 / PITTSBURG CA
SSN/TIN	-2636
Gov't Issued Photo ID, Type, State, Number, Issue Date, Exp. Date	Drivers License CA 1: 4/8/2005 E 2010
Other ID (Description, Details)	
Employer & Occupation	Employer: Occupation:
Members Maiden Name	CADY
Owner/Signer Information 4	
Name	DORRIE CHUNG
Relationship to Account (Owner and/or Signer, etc.)	AUTH SIGNER
Address	5186 CARROLL CANYON RD, SAN DIEGO, CA 92121-1729
Mailing Address (if different)	
Home Phone	(760)
Work Phone	(858) 875-5802
Mobile Phone	760-
E-Mail	
Birth Date/Birth Place	1963 / LOS ANGELES
SSN/TIN	-3757
Gov't Issued Photo ID, Type, State, Number, Issue Date, Exp. Date	Drivers License CA 1: 1:6/9/2009 F 2014
Other ID (Description, Details)	Desc: Credit Card #: CAPITAL ONE VISA 9187 I: E: 7/31/2012
Employer & Occupation	Employer: WESTERN FINANCIAL Occupation: CONTROLLER
Members Maiden Name	ANDREADIS
Backup Withholding Certifications	
<i>(If not a "U.S. Person," certify foreign status separately.)</i>	
TIN: 20-8721184	
<input checked="" type="checkbox"/> Taxpayer I.D. Number (TIN) - The number shown above is my correct taxpayer identification number. <input checked="" type="checkbox"/> Backup Withholding - I am not subject to backup withholding either because I have not been notified that I am subject to backup withholding as a result of a failure to report all interest or dividends, or the Internal Revenue Service has notified me that I am no longer subject to backup withholding. <input type="checkbox"/> Exempt Recipients - I am an exempt recipient under the Internal Revenue Service Regulations.	
I certify under penalties of perjury the statements checked in this section and that I am a U.S. person (including a U.S. resident alien).	
X <u>Dore Durden</u> 9-30-08 (Date) REAL ASSET LOCATORS, INC	

Non-Individual Owner Information		
Name	REAL ASSET LOCATORS, INC	
EIN	20-8721184	
Phone	856-677-0276	
Mobile Phone		
E-Mail		
Type of Entity	Corporation - Profit	
State/Country & Date of Organization	NV, USA 03-20-2007	
Nature of Business	OTHER ACTIVITIES RELATED TO REAL ESTATE	
Address	5186 CARROLL CANYON RD, SAN DIEGO, CA 92121-1729	
Mailing Address (if different)		
Authorization/Respiration Date	09-28-2009	
Previous Financial Inst.		
Account Description	Account #	Initial Deposit/Source
BUSINESS CHECKING	16352	\$ <input type="checkbox"/> Cash <input type="checkbox"/> Check
		\$ <input type="checkbox"/> Cash <input type="checkbox"/> Check
		\$ <input type="checkbox"/> Cash <input type="checkbox"/> Check
Services Requested		
<input type="checkbox"/> ATM <input type="checkbox"/> Debit/Check Cards (No. Requested: _____) <input checked="" type="checkbox"/> ChexSystems <input checked="" type="checkbox"/> EXISTING <input checked="" type="checkbox"/> IDV		
Other Terms/Information		
NAICS Code: 531390		
Port Number: 44833		
Responsibility Code: Kathy Taylor		
Opened by: Dore Durden		
DATE ACCOUNT OPENED: 04/27/2007		
SUPERCEDES CARD DATED: 04/27/07		
ACCOUNT PASSWORD: _____		
Superseded 9-28-09 After 2 Adding one more Signer to the 3 Existing		

Excerpt

Mar. 14. 2012 3:46PM OPS SUPPORT

No. 8464 P. 3

Account Agreement

Date: OPENED: 04/27/2007

BANK OF NEVADA
10199 S. EASTERN AVENUE
LAS VEGAS, NV 89052

Internal Use
REAL ASSET LOCATORS, INC
6352
5186 CARROLL CANYON RD
SAN DIEGO CA 92121

IMPORTANT ACCOUNT OPENING INFORMATION: Federal law requires us to obtain sufficient information to verify your identity. You may be asked several questions and to provide one or more forms of identification to fulfill this requirement. In some instances we may use outside sources to confirm the information. The information you provide is protected by our privacy policy and federal law.

Enter Non-Individual Owner Information on page 2. There is additional Owner/Signer Information space on page 2.

The specified ownership will remain the same for all accounts.

<input type="checkbox"/> Individual	<input checked="" type="checkbox"/> Corporation - For Profit
<input type="checkbox"/> Joint with Survivorship (not as tenants in common or community property)	<input type="checkbox"/> Corporation - Nonprofit
<input type="checkbox"/> Joint with No Survivorship (as tenants in common)	<input type="checkbox"/> Partnership
<input type="checkbox"/> Community Property (no survivorship)	<input type="checkbox"/> Sole Proprietorship
<input type="checkbox"/> Trust-Separate Agreement Dated: _____	<input type="checkbox"/> Limited Liability Company

Name	LOUIS V SCHOOLER
Relationship to Account (Owner and/or Signer, etc.)	OWNER
Address	5186 CARROLL CANYON RD SAN DIEGO CA 92121
Mailing Address (if different)	
Home Phone	858-
Work Phone	
Mobile Phone	
E-Mail	
Birth Date	1951 PHOENIX
SSN/TIN	2087
Gov't Issued Photo ID, Type, Number, State, Issue Date, Exp. Date	Drivers License CA DL 1:03/26/2007 E 1/2012
Other ID (Description, Details)	Desc: Credit Card #: 61015 I: E:
Employer's Name & Address	Employer: WFPC Occupation: ESTATE ASSESSOR
Previous Financial Inst.	Mothers MN: STRUILLAN

(Check appropriate ownership above.)

<input type="checkbox"/> Revocable Trust	<input type="checkbox"/> Pay-On-Death (POD)
--	---

(Check appropriate beneficiary designation above.)

If checked, this is a temporary account agreement.

Number of signatures required for withdrawal: **ONE**

The undersigned authorize the financial institution to investigate credit and employment history and obtain reports from consumer reporting agencies on them as individuals. Except as otherwise provided by law or other documents, each of the undersigned is authorized to make withdrawals from the account(s), provided the required number of signatures indicated above is satisfied. The undersigned personally and as, or on behalf of, the account owner(s) agree to the terms of, and acknowledge receipt of copy(ies) of, this document and the following:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Terms and Conditions | <input checked="" type="checkbox"/> Privacy |
| <input checked="" type="checkbox"/> Electronic Fund Transfers | <input checked="" type="checkbox"/> Truth in Savings |
| <input checked="" type="checkbox"/> Substitute Checks | <input checked="" type="checkbox"/> Funds Availability |
| <input checked="" type="checkbox"/> Common Features | <input type="checkbox"/> |

Name	PAULINE LESSMAN
Relationship to Account (Owner and/or Signer, etc.)	OWNER
Address	5186 CARROLL CANYON RD SAN DIEGO CA 92121
Mailing Address (if different)	
Home Phone	858-
Work Phone	858-875-5803
Mobile Phone	
E-Mail	
Birth Date	1/1932, TOMASIN
SSN/TIN	.7690
Gov't Issued Photo ID, Type, Number, State, Issue Date, Exp. Date	Drivers License CA DL 1:08/21/2003 12008
Other ID (Description, Details)	Desc: Credit Card #: 1315 I: E:
Employer's Name & Address	Employer: WFPC Occupation: SECRETARY
Previous Financial Inst.	Mothers MN: LACA


(X) *Louis V Schooler*
LOUIS V SCHOOLER

Pauline Lessman
PAULINE LESSMAN

(X) *Robert M Schaffer*
ROBERT M SCHAFER

[XXXXXXXXXXXX]
XX

Authorized Signer (If checked and account is individual and consumer purpose, the last of the above signers is an Authorized Signer.) (page 1 of 2)

Name	ROBERT M SCHAFER	
Relationship to Account (Owner and/or Signer, etc.)	OWNER	
Address	5186 CARROLL CANYON RD SAN DIEGO CA 92121	
Mailing Address (if different)		
Home Phone	760	
Work Phone	760-434-7571	
Mobile Phone		
E-Mail		
Birth Date	PITTSBURG	/1931
SSN/TIN	2636	
Gov't Issued Photo ID, Type, Number, State, Issue Date, Exp. Date	Drivers License I:04/08/2005 E U2010	
Other ID (Description, Details)	Desc: Credit Card #:9264 I: E:	
Employer's Name & Address	Employer: WFGC ESTATE ASSESSOR	
Previous Financial Inst.	Mothers MN: CADDY	
Name		
Relationship to Account (Owner and/or Signer, etc.)		
Address		
Mailing Address (if different)		
Home Phone		
Work Phone		
Mobile Phone		
E-Mail		
Birth Date		
SSN/TIN		
Gov't Issued Photo ID, Type, Number, State, Issue Date, Exp. Date	I: E:	
Other ID (Description, Details)	Desc: #: I: E:	
Employer's Name & Address	Employer: Occupation:	
Previous Financial Inst.	Mothers MN:	
<i>(If not a "U.S. Person," certify foreign status separately.)</i>		
TIN: 20-8721184		
<input checked="" type="checkbox"/> Taxpayer I.D. Number (TIN) - The number shown above is my correct taxpayer identification number.		
<input checked="" type="checkbox"/> Backup Withholding - I am not subject to backup withholding either because I have not been notified that I am subject to backup withholding as a result of a failure to report all interest or dividends, or the Internal Revenue Service has notified me that I am no longer subject to backup withholding.		
<input type="checkbox"/> Exempt Recipients - I am an exempt recipient under the Internal Revenue Service Regulations.		
I certify under penalties of perjury the statements checked in this section and that I am a U.S. person (including a U.S. resident alien).		
		6/3/07 (Date)
REAL ASSET LOCATORS, INC		

Name	REAL ASSET LOCATORS, INC	
EIN	E20-8721184	
Phone	858-607-0275	
Mobile Phone		
E-Mail		
Type of Entity	Corporation - Profit	
State/Country & Date of Organization		
Nature of Business	OTHER ACTIVITIES RELATED TO REAL ESTATE	
Address	5186 CARROLL CANYON RD SAN DIEGO CA 92121	
Mailing Address (if different)		
Authorization/Rescission Date		
Previous Financial Inst.		
BUSINESS CHECKING	6352	<input type="checkbox"/> Cash <input type="checkbox"/> Check
XXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXX	<input type="checkbox"/> Cash <input type="checkbox"/> Check
XXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXX	<input type="checkbox"/> Cash <input type="checkbox"/> Check
XXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXX	<input type="checkbox"/> Cash <input type="checkbox"/> Check
XXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXX	<input type="checkbox"/> Cash <input type="checkbox"/> Check
<input type="checkbox"/> ATM <input type="checkbox"/> Debit/Check Cards (No. Requested: _____)		
<input checked="" type="checkbox"/> CheckSystems		
<input checked="" type="checkbox"/> QFAC		
NAICS CODE: 531380 Port Number: 44833 Responsibility Code: 461 - Kathy Taylor Opened By: 1364 - 1364		
SUPERCEDES CARD DATED: - / /		
ACCOUNT PASSWORD: _____		