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11 Attorneys for Receiver  
12 KRISTA FREITAG

13 UNITED STATES DISTRICT COURT  
14 SOUTHERN DISTRICT OF CALIFORNIA

15  
16 SECURITIES AND EXCHANGE  
COMMISSION,

17 Plaintiff,

18 v.

19 GINA CHAMPION-CAIN and ANI  
20 DEVELOPMENT, LLC,

21 Defendants,

22 AMERICAN NATIONAL  
INVESTMENTS, INC.,

23 Relief Defendant.  
24  
25  
26

Case No. 3:19-cv-01628-LAB-AHG

**RECEIVER'S NOTICE OF MOTION  
AND MOTION FOR APPROVAL OF  
SETTLEMENT AGREEMENTS  
WITH:**

**1) MERIT FINANCIAL, INC. AND  
ILAN AWERBUCH;**

**2) RANDOLPH C. HOUTS, THE  
LAW OFFICES OF RANDOLPH C.  
HOUTS, AND POWER  
PROCESS INC.**

Date: TBD  
Time: TBD  
Courtroom: 14A  
Judge: Hon. Larry Alan Burns

1           **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**  
2           **NOTICE IS HEREBY GIVEN** that on a date and time to be determined in  
3 Courtroom 14A of the United States District Court, Southern District of California,  
4 located at 333 West Broadway, San Diego, California 92101, Krista Freitag  
5 ("Receiver"), the Court-appointed permanent receiver for Defendant ANI  
6 Development, LLC, Relief Defendant American National Investments, Inc., and  
7 their subsidiaries and affiliates ("Receivership Entities"), will, and hereby does,  
8 move this Court for Approval of Settlement Agreements with: 1) Merit Financial,  
9 Inc. and Ilan Awerbuch; 2) Randolph C. Houts, the Law Offices of Randolph C.  
10 Houts, and Power Process Inc. ("Motion").

11           This Motion is based upon this notice, the accompanying Memorandum of  
12 Points and Authorities, the Declaration of Krista L. Freitag, and all pleadings and  
13 papers on file in this action, and upon such other matters as may be presented to the  
14 Court at the time of hearing.

15           **Procedural Requirements:** If you oppose the Motion, you are required to  
16 file your written opposition with the Office of the Clerk, United States District  
17 Court, Southern District of California, 333 West Broadway, Suite 420, San Diego,  
18 California 92101, and serve the same on the undersigned by the deadline to be set by  
19 the Court (further notice will be provided). An opposing party's failure to file an  
20 opposition to any motion may be construed as consent to the granting of the motion  
21 pursuant to Civil Local Rule 7.1(f)(3)(c).

22  
23 Dated: September 1, 2022

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

24  
25  
26 By:           s/Edward G. Fates            
27           DAVID R. ZARO  
28           EDWARD G. FATES  
              MATTHEW D. PHAM  
              Attorneys for Receiver  
              KRISTA FREITAG