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9  
10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**

12 SECURITIES AND EXCHANGE  
13 COMMISSION,

14 Plaintiff,

15 vs.

16 BIC REAL ESTATE  
DEVELOPMENT CORPORATION  
17 and DANIEL R. NASE, individually  
and d/b/a BAKERSFIELD  
18 INVESTMENT CLUB,

19 Defendants,

20 BIC SOLO 401K TRUST and  
21 MARGARITA NASE,

22 Relief Defendants.  
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Case No. 1:16-cv-00344-LJO-JLT

**PLAINTIFF SECURITIES AND  
EXCHANGE COMMISSION'S  
RESPONSE TO RECEIVER'S  
MOTION FOR ORDER: (1)  
APPROVING FINAL REPORT AND  
ACCOUNTING; (2) AUTHORIZING  
PAYMENT OF FINAL FEE  
APPLICATION OF RECEIVER AND  
PROFESSIONALS; (3)  
AUTHORIZING FINAL  
DISTRIBUTION ON ALLOWED  
CLAIMS; (4) AUTHORIZING  
SUBMISSION OF APPROPRIATE  
TAX RETURNS; (5) AUTHORIZING  
ABANDONMENT OR DESTRUCTION  
OF RECORDS; AND (6) CLOSING  
RECEIVERSHIP CASE AND  
DISCHARGING RECEIVER (Dkt. No.  
446)**

25 Date: July 1, 2020  
26 Time: 8:30 a.m.  
27 Place: Courtroom 4, Seventh Floor  
Hon. Lawrence J. O'Neill  
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1 Plaintiff Securities and Exchange Commission (“SEC”) respectfully states that it  
2 does not oppose the Receiver’s Motion for Order: (1) Approving Final Report and  
3 Accounting; (2) Authorizing Payment of Final Fee Application of Receiver and  
4 Professionals; (3) Authorizing Final Distribution on Allowed Claims; (4) Authorizing  
5 Submission of Appropriate Tax Returns; (5) Authorizing Abandonment or Destruction  
6 of Records; and (6) Closing Receivership Case and Discharging Receiver. (Dkt. No.  
7 446.) For reasons stated by the Receiver in his motion, the SEC supports this motion.  
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9 Dated: June 15, 2020

Respectfully submitted,

10  
11 /s/ John B. Bulgozdy  
12 John B. Bulgozdy  
13 Manuel Vazquez  
14 Matthew Montgomery  
15 Attorneys for Plaintiff  
16 Securities and Exchange Commission  
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**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,  
400 S. Flower Street, Suite 900, Los Angeles, California 90071  
Telephone No. (323) 965-3998; Facsimile No. (213) 443-1904.

On June 15, 2020, I caused to be served the document entitled **PLAINTIFF SECURITIES AND EXCHANGE COMMISSION’S RESPONSE TO RECEIVER’S MOTION FOR ORDER: (1) APPROVING FINAL REPORT AND ACCOUNTING; (2) AUTHORIZING PAYMENT OF FINAL FEE APPLICATION OF RECEIVER AND PROFESSIONALS; (3) AUTHORIZING FINAL DISTRIBUTION ON ALLOWED CLAIMS; (4) AUTHORIZING SUBMISSION OF APPROPRIATE TAX RETURNS; (5) AUTHORIZING ABANDONMENT OR DESTRUCTION OF RECORDS; AND (6) CLOSING RECEIVERSHIP CASE AND DISCHARGING RECEIVER (Dkt. No. 446)** 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.

**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 the 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.

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

Date: June 15, 2020

/s/ John B. Bulgozdy  
John B. Bulgozdy

**SEC v. BIC Real Estate Development Corporation, et al.**  
**United States District Court – Eastern District of California**  
**Case No. 1:15-cv-00344-LJO-JLT**

**SERVICE LIST**

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19 **Corporation**