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SUPREME COURT
STATE OF WASHINGTON
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SUPREME COURT NO. 96655-9

STATE OF WASHINGTON
SUPREME COURT
COA No. 76576-1-I

GREAT OCEAN CAPITAL HOLDING, LLC, a Washington limited liability
Company; HUY YING CHEN and XUE PING WANG, Husband and Wife Residing
in Washington State;

Appellant,

v.

YANLU LIU and AI HUA PAN, Husband and Wife Residing in King County, Washington;
PENG ZHANG and ZHONGYUAN PAN, Husband and Wife Residing in Ontario, Canada,

Respondent

PETITIONER RESPONSE RESPONDENT'S ANSWERED TO PETITIONER'S MOTION
TO DISQUALIFY RESPONDENTS COUNSEL

PRO SE for Two of Appellant
CHEN HUY YING
5112 189th Ave N.E
Sammamish, WA 98074
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Email: capt.chen@goshipline.com

I. INTRODUCTION

It is untruth for Respondents/Plaintiffs (“Respondents”) to state in their response for Petitioners countless time for this lawsuit because there is no other and any party willing take their lawsuit even one second longer. The Respondents/Plaintiffs (“Respondents”) with their Counsels initialed this lawsuit with unclean hand, not only lacks subject matter, personal jurisdiction and venue but the trial court also lacks jurisdiction and have no knowledge of EB 5 law which is under the Federal exclusive limited jurisdiction for United State Congress enacted § 203(b)(5) of the Immigration and Nationality Act (“INA”) at 1991 and U.S. Securities and Exchange commission (“SEC”) enacted June 6, 1934. It is codified at [15 U.S.C. § 78a](#) et seq.) is a law governing the [secondary trading](#) of securities, which cause countless times to be wastes in Washington Court judicial system with huge damaged to Petitioners.

Without Respondents Counsels intend to represent the case violate Rules of Professional Conduct RULE (“RPC RULE”) 1.3 / 1.8 – Conflict interest and RPC RULE 8.1(a) - knowingly made a false statement or material fact and 8.4(c) misconduct-engage in conduct involving dishonesty, fraud, deceit or misrepresentation, then this case will never move forward until now since Respondents Counsels knew this is a EB5 case and the purposely used Washington State Securities Act (“WSSA”) to win the case which could see from their own web-site to celebrate their case win (**Appendix I**).

Respondents’ Counsels clearly known Defendant of Great Ocean Capital Holding, LLC (“GOCH”) are limited liability partnership company and Huy Ying Chen & Xue Ping Wang (“CHEN”) and LIU YAN LU, PAN AI HUA (“LIUS”) are general partners and PAN ZHANG YAN & ZHANG PENG (“PANS”) are limited partner for GOCH. Respondents and Respondents Counsels fully known the case was “no sue” under RCW 25.15.386. and RCW 25.10.701(2).

The Respondents Counsels’ intended to mislead the Supreme Court by their answering Petitioner disqualify motion said they presented as “PANS’ Counsel” but it is fact to be found in whole case filing documents that they presented four of Defendants - LIU YAN LU, PAN AI HUA and PAN ZHANG YAN & ZHANG PENG which, **all four of Defendants are LLC partners of GOCH.**

Not only that Respondents’ Counsels represented LIUS as two of Plaintiff but also Defendants of GOCH – General partner LIU YAN LU, PAN AI HUA this against the RPC rule of

“interest Conflict” violated RPC 1.3 /1.8.

Base on Respondents’ Counsels’ response to disqualify’ motion said PANS have not file “derivate claims” which the Court could logically consider that the Respondents’ Counsels classifying and labeled their claim as “direct claims”. Base on A direct claim RCW 25.10.701(2) - Direct action by against the limited partnership LLC allowed only if the member or group of members were injured by the actions of the LLC, as well as follow Plaintiffs’ cause of action that entire LLC could be injured by the action of a manager, Plaintiffs claim should not classify as direct either**. Respondents Counsel clearly knew all Plaintiffs are partners of LLC lack the type of personal injury insufficient to confer standing for a direct suit for violation of “no sue” under RCW 25.15.386 and RCW 25.10.701(2), Therefore, Respondents Counsel violated RPC violated RPC 1.3 /1.8, RPC 4.1(1)(2)(3) & 8.1(a), 8.4(c) and motion for disqualify Respondents Counsels need to be granted.

*** Respondents Counsel’s initial brought up 8 cause of action claims but through evidence that only violation of Washington State Securities Act (“WSSA”)” * of cause of actions that pending in this Court. Even so if direct claims for LLC which must presented to Court their individual injuries.*

II. Identity of Parties

(A) Petitioners - Huy Ying Chen & Xue Ping Wang (“CHEN”) as two of Defendants act Pro Se for answer their disqualify motion against Respondents & Respondents’ Counsel.

(B). Respondents, (collectively as the “Respondents” or Plaintiffs”) are Yanlu Liu and Ai Hua Pan (“LIUS”), Zhongyuan Pan (“PAN”) and Peng Zhang (“ZHANG”).

III RELIEF SOUGHT

1. Respondents Counsel not dispute for their initialed this case in bad faith with unclean hand:

Pursuit to “clean hands” doctrine that mean a rule of law that a person coming to Court with a lawsuit or petition for a Court Order must be free from unfair conduct without done anything wrong regarding the subject matter of his/her claim. Respondents and Respondents Counsel not involved abominable in their legal action and completely violated Rule of Professional Conduct “RPC”. With petitioners’ presented statement that Respondents Counsel violated RPC 1.3 /1.8, RPC 4.1(1)(2)(3) & 8.1(a), 8.4(c).

2. Respondents have not dispute for Petitioner’s discretionary review brief for a EB 5 case are not a Federal Securities Act or State Security Act:

(1) Although both of EB 5 law and SEC were enacted by United State Congress under federal limited exclusive jurisdiction, but SEC enacted June 6, 1934, codified at 15 U.S.C. § 78a et seq.) is a law governing the secondary trading of securities and EB5 enacted § 203(b)(5) at 1991 of the Immigration and Nationality Act (“INA”) for Petition of Alien Entrepreneur create jobs. None of issue could be State jurisdictions.

Respondents counsel consistently raise “The Court of Appeals affirmed not error when it held that Pan’s WSSA claim is not preempted by federal law” and cited that under 15 U.S.C. 77r(c)(1)(A)(i) that states retain the authority “. This argument does not make any sense or legal stand because EB 5 congress codified case are different SEC codifies which mean even a different jurisdiction in federal law between EB 5 and SEC.

How a SEC - 15 U.S.C. 77r(c)(1)(A)(i) could applied to WSSA with preemption or bring enforcement actions under securities or securities transaction, because that are EB 5 Case vs. WSSA not nothing to do with SEC vs. WSSA. It has no jurisdiction or preemption existed and how of “fraud or deceit” could be existed.

Respondents Counsel also in rejecting GOCH's position stated that Court of Appeals noted that the federal law that governs EB-5 investments and the creation of “regional centers” contains no provision that preempts a state law securities claim.

The argument Respondents’ Counsels also brought that Pan have no violated Federal law so should have no Federal subject matter jurisdiction occurring. It is simply wrong because Petitioner are not alleging Pan violate Federal law (except perjury her oath*) but

alleged that the case Respondents Counsels filed in WSSA have no jurisdiction to review United State Congress enact INA law for Federal exclusive limited jurisdiction of EB 5 case.

* Petitioners accused Respondent perjury because PANS claimed they filed a withdraw their I-526 approval through Arkansas USCIS Service Center which they did not and truth the Service center did not accept any EB5 withdrawal case, instead of changed their immigrants legal statue especially I-485.

3. Respondents not dispute for Respondents are foreigners, WSSA could only for Washington domiciled investors and not applied any foreigners' legal stand:

Respondents Counsel also objection in Petitioners disqualify motion said, "Superior Court have general jurisdiction including Washington State Securities Act ("WSSA")". It is simply wrong objection again because not only WSSA have no jurisdiction for foreigners, but Respondents signed Private placement memorandum ("PPM") with binding capacities including exemption for RCW 21.20 which included RCW 6.21.430 that Respondents Counsel claimed.

Respondents Counsels clearly knew WSSA does not applied for foreigners and intend to cheat and mislead which should cause Petitioners' motion to disqualify counsels be granted.

4. Respondents not dispute for Petitioner' statement for "diversify" jurisdiction:

It is not disputed that diversity jurisdiction must be Federal not State. As base on Respondents answers the Petitioners' disqualify motion stated, "Washington securities laws are designed to protect investors such as ...". Please be noted that only for Washington State residential investors be protected by Counsel claim not for foreigners. It is clearly two of Respondents dominical were not from Washington State or any U.S. State but is a China national residing in Toronto Canada furthermore the another two of LIUS under their Counsels misrepresented stated LIU & Aihua dominical at King County, Washington but they are not in King County but Snohomish County at Bothell address at 23022 49th Ave Se, Bothell WA 98021-9023.

It is clearly allege for Respondents Counsels known about their clients dominical residents which misrepresented to Court with false and untrue allegation, which violate RPC 4.1(1)(2)(3) & 8.1(a), 8.4(c). therefore, Petitioners' motion for disqualify should be granted,

5. Respondents not dispute for GOCH alleges that United States Citizenship and Immigration Service (“USCIS”) granted Respondents Bonnie Pan (“Pan”) and Peng Zhang (“Zhang”) a conditional green card but no evidence:

The only Respondents Counsels' objection are GOCH presents “**no evidence**” in the record that supports the allegation that Respondents received a conditional green card. Petitioners have been presented into the Court for (**Appendix II**) which show clearly that Pan & Zhang's I-526** for permanent resident immigration application have received approval. Respondents and Responders Counsel knew very clearly for I-526 approval mean Respondents petition of Alien Entrepreneur approval. Petitioners presenting again (**Appendix II**) for approval certificate which came from USCIS web-site of public information which could overcome Counsel statement for no evidence in the record. Respondents Counsel intend to mislead this Court that Respondents have no receive Green Card application, therefore motion to disqualified need to be granted for Counsel false statement.

*** I-526, Immigrant Petition by Alien Entrepreneur for status as an immigrant to United States under section 203(b)(5). if applicants stay in USA during applied period then could filing their I-485 after I-526 approval to change their statue or go to U.S. Consulate in General for their immigration visa if they abroad.*

5. It is misleading this court to state The Chens waived their right to have Respondents' Counsel disqualified by waiting nearly four years to file the motion to disqualify.

In respect for Washington State judicial system that he disqualified motion have been brought about middle of 2016 through State of Washington Commission on juridical conduct with motion against Superior Court Judge and Plaintiff Counsels but due to politically taken longer time for procedure investigation. Therefore, Respondents Counsel could not accuse Petitioner waiting longer time to motion to disqualify Respondents counsels.

Respondents Counsel wrong applied for” First Small Bus. Inv. Co. v. Intercapital Corp., 108 Wn.2d 324, 337, 738 P.2d 263 (1987). “A motion to disqualify should be made

with reasonable promptness after a party discovers the facts which lead to the motion. This court will not allow a litigant to delay filing a motion to disqualify in order to use the motion later as a tool to deprive his opponent of counsel of his choice after substantial preparation of a case has been completed.”. Petitioners have no any intention to deprive his Respondents’ Counsel by delay their disqualify motion just because Petitioners almost be buried with lack of jurisdiction from the WSSA issue. The law strictly rules that merits proceeding could not pursued if jurisdiction issue not straight out. The Superior Court Judge, commission and Counsel seriously violated the constitution law, which not only hurt all other GOCH LLC members investors and kill CHENS as managing members for LLC business capacities. Respondents Counsels’ seriously violation of Rule of Professional Conduct must be disqualified.

6. Respondents Counsels misleading this court in their answer in Petitioners’ disqualify motion stated Derivative Action Not Required by Pan case.

Neither RCW 25.15.386 of Derivative Action not existent nor Pans’ direct claim case RCW 25.10.701(2) can be existed. Respondents Counsels stated Pans’ case not applied a “derivate claims” which considerably misleading as PANS’ “direct claims”. It is wrong for Plaintiffs’ cause of action that lead to entire LLC be injured by the action of a manager, which lead to the claim not classify as direct.

Respondents Counsels clearly knew all four of Plaintiffs are partners of LLC with lack presentation of personal injury that insufficient to confer standing for a direct claim sue under RCW 25.15.386 or RCW 25.10.701(2).

7. Pan’s Counsel knew Pan signed PPM and Pan as investor members for GOCH

As a member of LLC that A direct claim allows the member or members to pursue the lawsuit in their own name(s). This is allowed only if the member or group of members were injured by the actions of the LLC. The PANS are GOCH as LLC investor have been benefit their green card application without be injured therefore how can their direct claims could be existing. The entire LLC was injured by the action of a manager and the claim does not classify as direct. Any injunction should be prevented the LLC from harming the voting

interest of the particular other members.

MDK law firm are specially for a “securities” Counsels who are more familiar between direct claim vs. Derivative claim for a limited liabilities partnership company. With bad faith intended to win case rather than to violate the law of RCW RCW 25.15.386 & RCW 25.10.701(2), **MDK clearly knew** PAN & Zhang are foreigner if not add LIUS which could cause superior Courts’ confusion for diversity jurisdiction. Counsel knew especially that the Superior court have no knowledge for EB 5 law and SEC law or even about WSSA. Obviously, this was clearly in bad faith with unclean hand misleading justice, therefore, Petitioners’ disqualify motion could be grant.

8. Respondents Counsel misleading in Petitioner’s’ disqualify motion stated that Temporary Restraining Order Was Proper:

It is obviously “cheated” happened that Ex Parte Commissioner refused at first place about Court have no jurisdiction (**Appendix page 17-18**). At that time Commissioner not even known case no. 15-2-28694-3 of Complaints & Summon be intended to hold without service to Defendants. With violated *Connecticut v. Doeher*, 501 U.S. 1 (1991) of due process constitution without service Court documents for proceeding Defendants attachment. Not only this about Respondents dare to deceit the Court Judge / commissioner with their proposal order which fraud asked Commissioners signed their propose order against what Commissioner had been order in Court.

As Respondents’ Counsel statement said, “The Chen Fails to State All Nine Elements of a Fraud Claim and Pan’s Counsel Did Not Commit Fraud”. If cheating to the Court judge/ commissioner is not considered fraud, then what will fraud mean.

9. As Respondents’ Counsel statement that Jurisdiction Exists in This Matter.

It is serious misrepresentation and misleading to the supreme court about jurisdiction exist in this matter which clearly explained during motion to disqualify respondents Counsel

and be constantly emphasis above either relationship EB5, SEC, WSSA or diversity jurisdiction for foreigner statue.

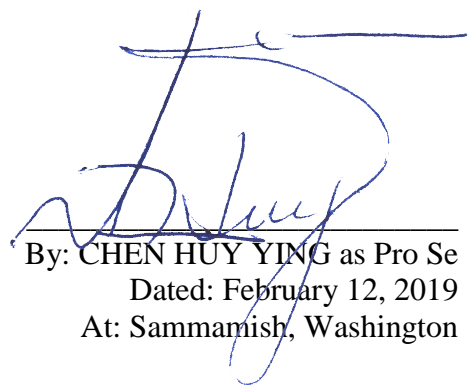
10. Respondents Counsel stated that The Chens Present No Legal Basis to Strike Respondents' Answer.

Obviously as an unclean hand in bad faith with violation of RPC 1.3 /1.8, RPC 4.1(1)(2)(3) & 8.1(a), 8.4(c) which cause a ground to strike Respondents answer with Counsel own perjury declaration. If Respondents' Counsel disqualify motion be granted then Respondents answer behalf by their Counsel must be stricken unless others Counsel represents or Respondents Pro Se.

III. CONCLUSION

Petitioner based on the foregoing facts and statutory authority herein objection for this Petitioner response to Respondent's Counsel answer to Petitioners' motion to disqualify because Respondents' Counsel clearly knew it was and is a violation for Rules of Professional Conduct. Furthermore, all four of the Plaintiffs' are all foreigners therefore with diversity in federal jurisdiction. Respondents counsels were fully aware that the above four of Plaintiffs were LLC member violated RCW 25.15.386, RCW 25.10.701(2) as well as subject matter and personal jurisdiction under illegal fraud and deceit this position RPC violation. The petitioner is looking forward this Court grantings CHENS' disqualification motion for MDK law's as its Counsels.

Respectfully submitted this 12th day of February 2019.



By: CHEN HUY YING as Pro Se
Dated: February 12, 2019
At: Sammamish, Washington

Appendix I

MDK Law Blog

Toggle nav

Dec 30 MDK Law Secures Judgment for Securities Fraud Against Developer of Purported EB-5 Regional Center in Western Washington

Shareholders James Ware and Mark Kimball and associate Courtney Bhatt recently secured judgment against a developer of a purported EB-5 regional center on behalf of one of the investors in the project. The basis of the judgment was securities fraud under the Washington State Securities Act (WSSA). The total award to the investor exceeded \$740,000.00. When MDK Law first initiated this action against the company and its founder, MDK Law sought and obtained a preliminary injunction that required the company to place the investor's initial investment into a blocked account that could not be accessed absent court order. As a result, MDK Law was able to ensure that the investor immediately recouped the investor's initial investment (which exceeded \$500,000) and then obtained a judgment for attorney fees and statutory interest pursuant to RCW § 21.20.430. Because of MDK Law's initial aggressive stance in the litigation, the investor was able to recoup the investor's initial investment almost immediately after entry of judgment instead of having go through the laborious process of enforcing a judgment.

This matter represents the third securities fraud case that MDK Law has brought on behalf of aggrieved investors in the past three years that yielded a multiple six-figure or larger award or settlement for the firm's clients.

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MDK Law Blog

Toggle nav

Dec 22 MDK Law Secures Preliminary Injunction for EB-5 Investor in Securities Act Violation Case



(//www.mdklaw.com/wp-content/uploads/2015/12/mdk_logo-Horizontal-No-Service-Mark.jpg)On December 18, 2015, MDK Law owners James P. Ware and Mark D. Kimball secured a significant preliminary win for a client who had invested over \$500,000 in a Washington-based international trading company. The client intended to use the investment to obtain a U.S. Visa through the EB-5 program as the project had been designated as a Regional Center by the United States Customs and Immigration Services ("USCIS). Based upon specific

language in the project's Private Placement Memorandum ("PPM") and documentation submitted to the USCIC regarding the project, MDK Law was able to establish a basis for an injunction that funds the firm's client had investment into the project—which exceeded \$500,000—should be held in a blocked account until the trial court renders a final decision in the matter. With the large influx of capital from overseas, more potential developers and entrepreneurs are soliciting funds from overseas investors through the EB-5 program. While the EB-5 program is a desirable

means by which a high net wealth individual may obtain a U.S. visa, it is imperative that the potential investor perform due diligence about the project and claims made in the PPM prior to investing.

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Appendix II

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U.S. Citizenship and Immigration Services

FORMS

NEWS

CITIZENSHIP

GREEN CARD

TOOLS

LAWS



Case Was Approved

On April 13, 2016, we approved your Form I-526, Immigrant Petition by Alien Entrepreneur, Receipt Number WAC1490411345. We will mail your approval notice.

Please follow the instructions in the notice. If you move, go to www.uscis.gov/addresschange to give us your new mailing address.



Enter Another Receipt Number ?

CHECK STATUS

THE UNITED STATES OF AMERICA

RECEIPT NUMBER WAC-14-904-11345		CASE TYPE I526 IMMIGRANT PETITION BY ALIEN ENTREPRENEUR
RECEIPT DATE August 25, 2014	PRIORITY DATE August 22, 2014	APPLICANT PAN, ZHONGYUAN
NOTICE DATE April 13, 2016	PAGE 1 of 1	
ZHONGYUAN PAN 23922 49TH AVENUE SE BOTHELL WA 98021		Notice Type: Approval Notice Section: Investor - Target employment area, 203(b)(5)(C)(ii) INA
<p>The above petition has been approved.</p> <p>The petition indicates that the person for whom you are petitioning is in the United States and will apply for adjustment of status. He or she should contact the local USCIS office to obtain Form I-485, Application for Permanent Residence. A copy of this notice should be submitted with the application.</p> <p>If the person for whom you are petitioning decides to apply for a visa outside the United States based on this petition, the petitioner should file form I-824, Application for Action on an Approved Application or Petition, to request that we send the petition to the Department of State National Visa Center (NVC).</p> <p>The NVC processes all approved immigrant visa petitions that require consular action. The NVC also determines which consular post is the appropriate consulate to complete visa processing. It will then forward the approved petition to that consulate.</p> <p>Please read the back of this form carefully for more information.</p> <p>The approval of this visa petition does not in itself grant any immigration status and does not guarantee that the alien beneficiary will subsequently be found to be eligible for a visa, for admission to the United States, or for an extension, change, or adjustment of status.</p> <p>THIS FORM IS NOT A VISA AND MAY NOT BE USED IN PLACE OF A VISA.</p> <p>The Small Business Regulatory Enforcement and Fairness Act established the Office of the National Ombudsman (ONO) at the Small Business Administration. The ONO assists small businesses with issues related to federal regulations. If you are a small business with a comment or complaint about regulatory enforcement, you may contact the ONO at www.ombudsman.sba.gov or phone 202-205-2417 or fax 202-491-5719.</p> <p>NOTICE: Although this application/petition has been approved, USCIS and the U.S. Department of Homeland Security reserve the right to verify the information submitted in this application, petition and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the Internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of verification will be used to determine whether revocation, rescission, and/or removal proceedings are appropriate. Applicants, petitioners, and representatives of record will be provided an opportunity to address derogatory information before any formal proceeding is initiated.</p>		

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Appendix III

**Transcript for Ex Parte Hearing at 12.18, 2015 violated
constitution law - Connecticut vs. Doehr**

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In the Matter of:



YANLU LIU and AI HUA PAN

vs.

GREAT OCEAN CAPITAL HOLDING, LLC

VERBATIM REPORT OF PROCEEDING

December 08, 2015



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1 SUPERIOR COURT OF WASHINGTON IN AND FOR KING COUNTY

2

3 YANLU LIU and AI HUA PAN,)

4 husband and wife residing in)

5 King County, Washington; PENG)

6 ZHANG and ZHONGYUAN PAN,)

7 husband and wife residing in)

8 Ontario, Canada,)

9 Plaintiffs,)

10 vs.) 15-2-28694-3 SEA

11 GREAT OCEAN CAPITAL HOLDING,)

12 LLC, a Washington limited)

13 liability company; HUY YING)

14 CHEN and XUE PING WANG,)

15 husband and wife residing in)

16 Washington State,)

17 Defendants.)



18

19 VERBATIM REPORT OF PROCEEDING

20 BEFORE THE HONORABLE

21 CARLOS VELATEGUI

22

23 DECEMBER 8, 2015

24 TRANSCRIBED FROM RECORDING BY:

25 CHERYL J. HAMMER, RPR, CCR 2512



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A P P E A R A N C E S

FOR THE PLAINTIFFS:

JAMES P. WARE
MDK Law Associates
777 108th Ave NE, Suite 2000
Bellevue, Washington 98004
425.455.9610
jware@mdklaw.com



1 news or the local news with regard to EB5
2 applications? So he's just some guy who has a
3 contract with your clients and he doesn't appear to be
4 living up to the terms of the contract? Do you have a
5 contract dispute?

6 MR. WARE: Well, we also have a fraud
7 under the Washington Securities Act.

8 THE COURT: And what's the fraud?

9 MR. WARE: The fraud is a material
10 misrepresentation in the PPM, which is the lease.

11 THE COURT: But your evidence of the
12 existence or nonexistence of that -- of that lease is
13 hearsay.

14 MR. WARE: But in addition, Your
15 Honor, that if in fact there was actually a lease, the
16 project would have started by now.

17 THE COURT: Well, that's what you'd
18 like to argue. I don't know that.

19 MR. WARE: That is -- as someone
20 seeking a TRO, I don't need to definitively prove my
21 case.

22 THE COURT: But you have to prove
23 irreparable injury.

24 MR. WARE: Right.

25 THE COURT: And you have to prove the



1 exigent circumstances. Without that, you have
2 nothing.

3 MR. WARE: The exigent --

4 THE COURT: **Doehr versus Connecticut.**

5 There's a Ninth Circuit Court of Appeals that say
6 contract disputes are unconstitutional and Mr.
7 Kronenberg, a lawyer who got a prejudgment attachment
8 on real estate, ended up being the defendant, as I
9 recall, once the Court of Appeals said he had no right
10 to the attachment of the property on nothing more than
11 his complaint.

12 MR. WARE: But if the escrow, if it's
13 in an escrow account, then it is not the --

14 THE COURT: Is your client in charge
15 of the escrow account?

16 MR. WARE: No. And that's the
17 concern, is that my client has no access; doesn't even
18 know what's left in the escrow account.

19 THE COURT: Mm.

20 MR. WARE: But if it is truly an
21 escrow account, then it should be Ms. Pan's money --
22 funds in --

23 THE COURT: So you want the court to
24 manage a contract dispute between these two parties?

25 MR. WARE: This is not a contract



1 dispute. Again, Your Honor, it's still, it's a
2 securities act --

3 THE COURT: Well, where is --

4 MR. WARE: -- violation.

5 THE COURT: Why doesn't the securities
6 commission come in and grab the account if they think
7 there's violations here?

8 MR. WARE: Because under the
9 securities act an individual has a private cause of
10 action.

11 THE COURT: So they just default to
12 individual private people?

13 MR. WARE: Well, it depends on if the
14 --

15 THE COURT: Or they don't have enough
16 yet to go after Mr. Chen?

17 MR. WARE: Well, I don't know if
18 there's been an investigation, what the status of that
19 investigation is.

20 Again, if we limit it to the escrow
21 account.

22 THE COURT: The problem you're having
23 is that the six figure number that's rolling around in
24 my brain for the bond you're going to have to post.

25 MR. WARE: If it's limited --



ANDREA CHEN - FILING PRO SE

March 12, 2019 - 2:35 PM

Filing Motion for Discretionary Review of Court of Appeals

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: Case Initiation
Appellate Court Case Title: Yanlu Liu, et al, Respondents v. Great Ocean Capital Holding, LLC, et al, Appellants (765761)

The following documents have been uploaded:

- DCA_Other_20190312143217SC952657_0305.pdf
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The Original File Name was 03-12-2019 Chens Answer to MDK disqualify motion.pdf

A copy of the uploaded files will be sent to:

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Comments:

Please disregard the last filing as this is a response to Respondents answers. The Supreme Court Case Number is 966559.

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Address:
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