

**MANNING CURTIS BRADSHAW  
& BEDNAR LLC**

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*Attorneys for Plaintiff R. Wayne Klein, the  
Court-Appointed Receiver of U.S. Ventures, LC,  
Winsome Investment Trust, and the assets of Robert  
J. Andres and Robert L. Holloway*

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UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, CENTRAL DIVISION

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R. WAYNE KLEIN, the Court-Appointed  
Receiver of U.S. Ventures LC, Winsome  
Investment Trust, and the assets of Robert J.  
Andres and Robert L. Holloway,

Plaintiff,

vs.

WARREN WAI HUNG CHIU, WINNIE  
CHIU, STEPHEN CHIU, JENNIFER CHIU,  
and PACIFICWIN INVESTMENTS,

Defendants.

**CONSENT JUDGMENT AGAINST  
WARREN WAI HUNG CHIU**

Case No. 2:12-cv-00116-DBP

Magistrate Judge Dustin B. Pead

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Plaintiff R. Wayne Klein, the Court-Appointed Receiver (the "Receiver") of U.S.

Ventures LC ("US Ventures"), Winsome Investment Trust ("Winsome"), and all of the assets of

Robert J. Andres ("Andres") and Robert L. Holloway ("Holloway") (collectively the "Receivership Defendants") and Defendant Warren Wai Hung Chiu ("Warren Chiu"), to avoid prolonged litigation, hereby stipulate and agree that final judgment in favor of the Receiver and against Warren may be entered as follows:

1. The Receiver and Warren Chiu agree that the Court has jurisdiction over these actions and the parties involved in these actions.

2. The Receiver and Warren Chiu acknowledge that they have read and agreed to the terms of this Consent Judgment, are aware of their right to a trial in these matters, and have waived that right.

3. The Receiver and Warren Chiu state that they have entered into this Consent Judgment voluntarily.

4. Warren Chiu states that between February 2006 and March 2010, he received direct payments or payments on his behalf from Winsome and its affiliated entities in the aggregate amount of \$767,570.63. Accordingly, the Receiver and Warren Chiu affirmatively state and agree that Warren is liable to the Receiver in this action in the amount of \$767,570.63.

5. Warren Chiu does not admit or deny that Winsome and its affiliated entities operated as a Ponzi scheme; additionally, he does not admit the allegations in the Complaint, except for the jurisdictional facts necessary for the Court to retain jurisdiction over the parties for the enforcement of the judgment.

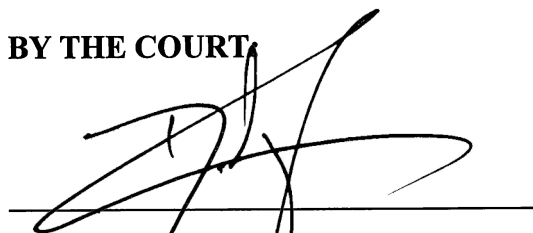
6. Therefore, judgment is hereby entered against Warren Chiu in the amount of \$767,570.63.

7. This Consent Judgment shall take effect upon entry by the Court, and the Receiver and Warren agree that the Court shall retain jurisdiction over Warren Chiu for the purpose of enabling any of the parties to this Consent Judgment to apply for further orders and directions as may be necessary or appropriate to carry out or construe this Consent Judgment, to modify or terminate any of its provisions, or to enforce compliance.

8. This Consent Judgment shall not affect the Receiver's rights to pursue his claims against Winnie Chiu, PacificWin Investments, Stephen Chiu, or Jennifer Chiu. Nor will this Consent Judgment affect the Receiver's right to pursue his claims against any other entity or individual whom the Receiver has sued as part of his continuing duty to recapture and return investor funds that were sent to US Ventures and Winsome and then diverted by US Ventures and Winsome.

SO ORDERED this 26<sup>th</sup> day of November, 2013.

**BY THE COURT,**

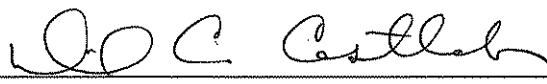
A handwritten signature in black ink, appearing to read 'Dustin B. Peab', is written over a horizontal line. The signature is stylized and somewhat cursive.

Dustin B. Peab  
United States Magistrate Judge

**APPROVED AND STIPULATED:**

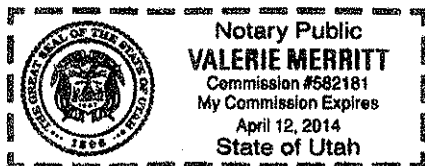
DATED this 11 day of July, 2013.

**MANNING CURTIS BRADSHAW  
& BEDNAR LLC**

  
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David C. Castleberry  
Aaron C. Garrett  
Attorneys for Receiver

Subscribed and sworn to before me this 11 day of July, 2013



  
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Notary Public

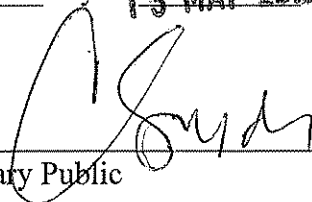
13 MAY 2013

DATED this \_\_\_\_ day of \_\_\_\_, 2013.



Warren Wai Hung Chiu

Subscribed and sworn to before me this \_\_\_\_ day of 13 MAY 2013 2013



Notary Public

**CARLA SNYDER**  
Vice Consul  
U.S. Consulate General  
Ho Chi Minh City, Vietnam