

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

U.S. COMMODITY FUTURES TRADING,)
COMMISSION and OKLAHOMA)
DEPARTMENT OF SECURITIES *ex rel*)
Irving L. Faught,)

Plaintiffs,)

v.)

Case No. 5:09-cv-01284-R

PRESTIGE VENTURES CORP., a)
Panamanian corporation, FEDERATED)
MANAGEMENT GROUP, INC., a Texas)
corporation, KENNETH WAYNE LEE, an)
individual, and SIMON YANG (a/k/a XIAO)
YANG a/k/a SIMON CHEN), an individual,)

Defendants,)

and)

SHEILA M. LEE, an individual, DAVID A.)
LEE, an individual, and DARREN A. LEE,)
an individual,)

Relief Defendants.)

**RECEIVER’S RESPONSE TO MOTION OF SHEILA LEE
TO RELEASE BANK ACCOUNTS FROZEN IN SRO**

Stephen J. Moriarty, as Receiver (“Receiver”) for Prestige Ventures Corp. (“Prestige”), Federated Management Group, Inc., Kenneth Wayne Lee, and Simon Yang (collectively the “Prestige Defendants”) for his reply to the Motion of Sheila Lee to Release Bank Accounts Frozen in SRO, filed on December 9, 2010 (Doc. # 138) (the “Motion”) states as follows:

1. In the Motion, Sheila Lee seeks return of two (2) bank accounts: (a) a Wachovia account with a balance of \$400.00 and (b) a Bank of America account with a balance of \$35.68.

2. On November 29, 2010, this Court entered its Order (Doc. # 131) and Judgment (Doc. # 132). Pursuant to the Order and Judgment, Sheila Lee must disgorge the sum of \$711,845.00 as ill-gotten gain.

3. Given the Judgment against Sheila Lee that remains unsatisfied, no funds, however inconsequential, should be returned to Sheila Lee. Investors in this scheme stand to recover a very small amount of their initial investment.

WHEREFORE, Receiver respectfully requests that this Court enter an Order denying the Motion of Sheila Lee to Release Bank Accounts Frozen in SRO and for such other and further relief as this Court deems just and proper.

/s/ Stephen J. Moriarty

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RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2010, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants: Patricia A. Labarthe, Katherine S. Driscoll, James Holl and Terra S. Bonnell.

I hereby certify that on December 16, 2010, a true and correct copy of the above and foregoing document was mailed by regular first class mail, postage prepaid, to:

SimonYang
1912NW176thTerrace
Edmond, OK 73012

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Mount Pleasant, SC 29466

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/s/ Stephen J. Moriarty
Stephen J. Moriarty

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