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4 Attorneys for Plaintiff  
5 SECURITIES AND EXCHANGE COMMISSION  
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8  
9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION  
12

13 SECURITIES AND EXCHANGE COMMISSION,

14 Plaintiff,

15 v.

16 BINGQING YANG,

17 Defendant.  
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Case No. 3:15-cv-03101 CRB (SK)

~~PROPOSED~~ FINAL JUDGMENT AS TO  
DEFENDANT BINGQING YANG

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1 The Securities and Exchange Commission having filed a Complaint and Defendant  
2 Bingqing Yang having entered a general appearance; consented to the Court's jurisdiction over  
3 Defendant and the subject matter of this action; consented to entry of this Final Judgment without  
4 admitting or denying the allegations of the Complaint (except as to jurisdiction and except as  
5 otherwise provided herein in paragraph XI); waived findings of fact and conclusions of law; and  
6 waived any right to appeal from this Final Judgment:

7 I.

8 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendant is permanently  
9 restrained and enjoined from violating, directly or indirectly, Section 10(b) of the Securities  
10 Exchange Act of 1934 (the "Exchange Act") [15 U.S.C. § 78j(b)] and Rule 10b-5 promulgated  
11 thereunder [17 C.F.R. § 240.10b-5], by using any means or instrumentality of interstate commerce, or  
12 of the mails, or of any facility of any national securities exchange, in connection with the purchase or  
13 sale of any security:

14 (a) to employ any device, scheme, or artifice to defraud;

15 (b) to make any untrue statement of a material fact or to omit to state a material fact  
16 necessary in order to make the statements made, in the light of the circumstances  
17 under which they were made, not misleading; or

18 (c) to engage in any act, practice, or course of business which operates or would  
19 operate as a fraud or deceit upon any person.

20 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in Federal  
21 Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who receive  
22 actual notice of this Final Judgment by personal service or otherwise: (a) Defendant's officers,  
23 agents, servants, employees, and attorneys; and (b) other persons in active concert or participation  
24 with Defendant or with anyone described in (a).

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26 II.

27 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant is  
28 permanently restrained and enjoined from violating Section 17(a) of the Securities Act of 1933 (the

1 “Securities Act”) [15 U.S.C. § 77q(a)] in the offer or sale of any security by the use of any means or  
2 instruments of transportation or communication in interstate commerce or by use of the mails,  
3 directly or indirectly:

- 4 (a) to employ any device, scheme, or artifice to defraud;
- 5 (b) to obtain money or property by means of any untrue statement of a material fact or  
6 any omission of a material fact necessary in order to make the statements made, in  
7 light of the circumstances under which they were made, not misleading; or
- 8 (c) to engage in any transaction, practice, or course of business which operates or  
9 would operate as a fraud or deceit upon the purchaser.

10 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in Federal  
11 Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who receive  
12 actual notice of this Final Judgment by personal service or otherwise: (a) Defendant’s officers,  
13 agents, servants, employees, and attorneys; and (b) other persons in active concert or participation  
14 with Defendant or with anyone described in (a).

15 III.

16 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant is  
17 permanently restrained and enjoined from violating Section 5 of the Securities Act [15 U.S.C. §  
18 77e] by, directly or indirectly, in the absence of any applicable exemption:

- 19 (a) Unless a registration statement is in effect as to a security, making use of any means  
20 or instruments of transportation or communication in interstate commerce or of the  
21 mails to sell such security through the use or medium of any prospectus or  
22 otherwise;
- 23 (b) Unless a registration statement is in effect as to a security, carrying or causing to be  
24 carried through the mails or in interstate commerce, by any means or instruments of  
25 transportation, any such security for the purpose of sale or for delivery after sale; or
- 26 (c) Making use of any means or instruments of transportation or communication in  
27 interstate commerce or of the mails to offer to sell or offer to buy through the use or  
28 medium of any prospectus or otherwise any security, unless a registration statement

1 has been filed with the Commission as to such security, or while the registration  
2 statement is the subject of a refusal order or stop order or (prior to the effective date  
3 of the registration statement) any public proceeding or examination under Section 8  
4 of the Securities Act [15 U.S.C. § 77h].

5 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in Federal  
6 Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who receive  
7 actual notice of this Final Judgment by personal service or otherwise: (a) Defendant's officers,  
8 agents, servants, employees, and attorneys; and (b) other persons in active concert or participation  
9 with Defendant or with anyone described in (a).

10 IV.

11 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant is permanently  
12 restrained and enjoined from, violating Sections 206(1), (2) and (4) of the Investment Advisers Act of  
13 1940 ("Advisers Act") [15 U.S.C. §§ 80b-6(1), (2) & (4)], and Rule 206(4)-8 thereunder [17 C.F.R.  
14 275.206(4)-8], by, directly or indirectly, by the use of any means or instrumentality of interstate  
15 commerce:

- 16 (a) employing any device, scheme, or artifice to defraud any client or prospective client;
- 17 (b) engaging in any transaction, practice or course of business which operates as a fraud  
18 or deceit upon any client or prospective client;
- 19 (c) engaging in any act, practice, or course of business which is fraudulent, deceptive, or  
20 manipulative; or
- 21 (d) while acting as an investment adviser to a pooled investment vehicle:
- 22 1. making any untrue statement of a material fact or omitting to state a material  
23 fact necessary to make the statements made, in the light of the circumstances  
24 under which they were made, not misleading, to any investor or prospective  
25 investor in the pooled investment vehicle; or
- 26 2. otherwise engaging in any act, practice, or course of business that is fraudulent,  
27 deceptive, or manipulative with respect to any investor or prospective investor  
28 in the pooled investment vehicle.

1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in Federal  
2 Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who receive  
3 actual notice of this Final Judgment by personal service or otherwise: (a) Defendant’s officers,  
4 agents, servants, employees, and attorneys; and (b) other persons in active concert or participation  
5 with Defendant or with anyone described in (a).

6 V.

7 IT IS FURTHER ORDERED that Defendant is permanently restrained and enjoined from  
8 directly or indirectly participating in the issuance, offer, or sale of any security of any entity  
9 controlled by her, or of any entity over which she exercises joint control.

10 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in Federal  
11 Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who receive  
12 actual notice of this Final Judgment by personal service or otherwise: (a) Defendant’s officers,  
13 agents, servants, employees, and attorneys; and (b) other persons in active concert or participation  
14 with Defendant or with anyone described in (a).

15 VI.

16 IT IS FURTHER ORDERED that Defendant is permanently restrained and enjoined from  
17 directly or indirectly soliciting any person or entity to purchase or sell any security.

18 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in Federal  
19 Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who receive  
20 actual notice of this Final Judgment by personal service or otherwise: (a) Defendant’s officers,  
21 agents, servants, employees, and attorneys; and (b) other persons in active concert or participation  
22 with Defendant or with anyone described in (a).

23 VII.

24 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, pursuant to Section  
25 21(d)(2) of the Exchange Act [15 U.S.C. § 78u(d)(2)] and Section 20(e) of the Securities Act [15  
26 U.S.C. § 77t(e)], Defendant is prohibited from acting as an officer or director of any issuer that has a  
27 class of securities registered pursuant to Section 12 of the Exchange Act [15 U.S.C. § 78I] or that is  
28 required to file reports pursuant to Section 15(d) of the Exchange Act [15 U.S.C. § 78o(d)].

## VIII.

IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant is liable for disgorgement of \$209,672 representing net profits gained as a result of the conduct alleged in the Complaint, together with prejudgment interest thereon in the amount of \$64,579 for a total of \$274,251, and a civil penalty in the amount of \$425,749 pursuant to Section 20(d) of the Securities Act and Section 21(d)(3) of the Exchange Act. Defendant shall satisfy this obligation by paying this amount pursuant to the terms of the payment schedule set forth in paragraph IX below after entry of this Final Judgment.

Defendant may transmit payment electronically to the Commission, which will provide detailed ACH transfer/Fedwire instructions upon request. Payment may also be made directly from a bank account via Pay.gov through the SEC website at <http://www.sec.gov/about/offices/ofm.htm>. Defendant may also pay by certified check, bank cashier's check, or United States postal money order payable to the Securities and Exchange Commission, which shall be delivered or mailed to

Enterprise Services Center  
Accounts Receivable Branch  
6500 South MacArthur Boulevard  
Oklahoma City, OK 73169

and shall be accompanied by a letter identifying the case title, civil action number, and name of this Court; Bingqing Yang as a defendant in this action; and specifying that payment is made pursuant to this Final Judgment.

Defendant shall simultaneously transmit photocopies of evidence of payment and case identifying information to the Commission's counsel in this action. By making this payment, Defendant relinquishes all legal and equitable right, title, and interest in such funds and no part of the funds shall be returned to Defendant.

The Commission may enforce the Court's judgment for disgorgement and prejudgment interest by using all collection procedures authorized by law, including, but not limited to, moving for civil contempt at any time after 30 days following entry of this Final Judgment.

1 The Commission may enforce the Court's judgment for penalties by the use of all  
2 collection procedures authorized by law, including the Federal Debt Collection Procedures Act, 28  
3 U.S.C. § 3001 et seq., and moving for civil contempt for the violation of any Court orders issued in  
4 this action. Defendant shall pay post judgment interest on any amounts due after 30 days of the  
5 entry of this Final Judgment pursuant to 28 U.S.C. § 1961. The Commission shall hold the funds,  
6 together with any interest and income earned thereon (collectively, the "Fund"), pending further  
7 order of the Court.

8 The Commission may propose a plan to distribute the Fund subject to the Court's approval.  
9 Such a plan may provide that the Fund shall be distributed pursuant to the Fair Fund provisions of  
10 Section 308(a) of the Sarbanes-Oxley Act of 2002. The Court shall retain jurisdiction over the  
11 administration of any distribution of the Fund and the Fund may only be disbursed pursuant to an  
12 Order of the Court.

13 Regardless of whether any such Fair Fund distribution is made, amounts ordered to be paid  
14 as civil penalties pursuant to this Judgment shall be treated as penalties paid to the government for  
15 all purposes, including all tax purposes. To preserve the deterrent effect of the civil penalty,  
16 Defendant shall not, after offset or reduction of any award of compensatory damages in any  
17 Related Investor Action based on Defendant's payment of disgorgement in this action, argue that  
18 she is entitled to, nor shall she further benefit by, offset or reduction of such compensatory  
19 damages award by the amount of any part of Defendant's payment of a civil penalty in this action  
20 ("Penalty Offset"). If the court in any Related Investor Action grants such a Penalty Offset,  
21 Defendant shall, within 30 days after entry of a final order granting the Penalty Offset, notify the  
22 Commission's counsel in this action and pay the amount of the Penalty Offset to the United States  
23 Treasury or to a Fair Fund, as the Commission directs. Such a payment shall not be deemed an  
24 additional civil penalty and shall not be deemed to change the amount of the civil penalty imposed  
25 in this Judgment. For purposes of this paragraph, a "Related Investor Action" means a private  
26 damages action brought against Defendant by or on behalf of one or more investors based on  
27 substantially the same facts as alleged in the Complaint in this action.  
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## IX.

Bingqing Yang shall pay the total of disgorgement, prejudgment interest, and penalty due of \$700,000 in two installments to the Commission according to the following schedule: (1) \$150,000, within 30 days of entry of this Final Judgment; (2) \$550,000 within 360 days of entry of this Final Judgment. Payments shall be deemed made on the date they are received by the Commission and shall be applied first to post judgment interest, which accrues pursuant to 28 U.S.C. § 1961 on any unpaid amounts due after 30 days of the entry of Final Judgment. Prior to making the final payment set forth herein, Bingqing Yang shall contact the staff of the Commission for the amount due for the final payment.

If Bingqing Yang fails to make any payment by the date agreed and/or in the amount agreed according to the schedule set forth above, all outstanding payments under this Final Judgment, including post-judgment interest, minus any payments made, shall become due and payable immediately at the discretion of the staff of the Commission without further application to the Court.

## X.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Consent is incorporated herein with the same force and effect as if fully set forth herein, and that Defendant shall comply with all of the undertakings and agreements set forth therein.

## XI.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, solely for purposes of exceptions to discharge set forth in Section 523 of the Bankruptcy Code, 11 U.S.C. §523, the allegations in the complaint are true and admitted by Defendant, and further, any debt for disgorgement, prejudgment interest, civil penalty or other amounts due by Defendant under this Final Judgment or any other judgment, order, consent order, decree or settlement agreement entered in connection with this proceeding, is a debt for the violation by Defendant of the federal securities laws or any regulation or order issued under such laws, as set forth in Section 523(a)(19) of the Bankruptcy Code, 11 U.S.C. §523(a)(19).

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XII.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms of this Final Judgment.

Dated: June 9, 2021, \_\_\_\_\_

  
UNITED STATES DISTRICT JUDGE  
CHARLES R. BRYER

1 ERIN E. SCHNEIDER (CA Bar No. 216114)  
schneidere@sec.gov  
2 SHEILA E. O'CALLAGHAN (CA Bar No. 131032)  
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8

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION  
12

13 SECURITIES AND EXCHANGE COMMISSION,  
14 Plaintiff,  
15 v.  
16 BINGQING YANG;  
17 Defendant.  
18

Case No. 3:15-cv-03101 CRB (SK)

**DEFENDANT BINGQING YANG'S  
CONSENT TO ENTRY OF FINAL  
JUDGMENT**

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1           1.       Defendant Bingqing Yang (“Defendant”) acknowledges having been served with the  
2 complaint in this action, enters a general appearance, and admits the Court’s jurisdiction over  
3 Defendant and over the subject matter of this action.

4           2.       Without admitting or denying the allegations of the Complaint (except as provided  
5 herein in paragraph 13 and except as to personal and subject matter jurisdiction, which Defendant  
6 admits), Defendant hereby consents to the entry of the final Judgment in the form attached hereto (the  
7 “Final Judgment”) and incorporated by reference herein, which, among other things:

8                   (a) permanently restrains and enjoins Defendant from violations of Section 10(b) of  
9 the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78j(b) and  
10 Rule 10b-5 thereunder, 17 C.F.R. §§ 240.10b-5; Section 17(a) of the Securities Act  
11 of 1933 (“Securities Act”), 15U.S.C. § 77q(a); Sections 5(a) and (c) of the  
12 Securities Act, 15 U.S.C. §§ 77e(a) and 77e(c); Sections 206(1), 206(2) and 206(4)  
13 of the Investment Advisers Act of 1940 (“Advisers Act”), 15 U.S.C. § 80b-6(1),  
14 80b-6(2) and 80b-6(4) and Rule 206(4)-8 thereunder, 17 C.F.R. § 275.206(4)-8;

15                   (b) permanently restrains and enjoins Defendant from directly or indirectly: (1)  
16 participating in the issuance, offer or sale of any security of any entity controlled  
17 by her, or of any entity over which she exercises joint control; and (2) soliciting  
18 any person or entity to purchase or sell any security;

19                   (c) prohibits Defendant, pursuant to Section 21(d)(2) of the Exchange Act, 15 U.S.C.  
20 § 78u(d)(2), and Section 20(e) of the Securities Act, 15 U.S.C. § 77t(e), from acting  
21 as an officer or director of any issuer that has a class of securities registered  
22 pursuant to Section 12 of the Exchange Act, 15 U.S.C. § 781, or that is required to  
23 file reports pursuant to Section 15(d) of the Exchange Act, 15 U.S.C. § 78(o)(d).

24                   (d) orders Defendant to pay disgorgement in the amount of \$209,672, plus  
25 prejudgment interest thereon in the amount of \$64,579, for a total of \$274,251; and

26                   (e) orders Defendant to pay a civil penalty in the amount of \$425,749 pursuant to  
27 Section 20(d) of the Securities Act and Section 21(d)(3) of the Exchange Act.  
28

1           3.       Defendant acknowledges that the civil penalty paid pursuant to the Final Judgment  
2 may be distributed pursuant to the Fair Fund provisions of Section 308(a) of the Sarbanes-Oxley Act  
3 of 2002. Regardless of whether any such Fair Fund distribution is made, the civil penalty shall be  
4 treated as a penalty paid to the government for all purposes, including all tax purposes. To preserve  
5 the deterrent effect of the civil penalty, Defendant agrees that she shall not, after offset or reduction  
6 of any award of compensatory damages in any Related Investor Action based on Defendant's  
7 payment of disgorgement in this action, argue that she is entitled to, nor shall she further benefit by,  
8 offset or reduction of such compensatory damages award by the amount of any part of Defendant's  
9 payment of a civil penalty in this action ("Penalty Offset"). If the court in any Related Investor  
10 Action grants such a Penalty Offset, Defendant agrees that she shall, within 30 days after entry of a  
11 final order granting the Penalty Offset, notify the Commission's counsel in this action and pay the  
12 amount of the Penalty Offset to the United States Treasury or to a Fair Fund, as the Commission  
13 directs. Such a payment shall not be deemed an additional civil penalty and shall not be deemed to  
14 change the amount of the civil penalty imposed in this action. For purposes of this paragraph, a  
15 "Related Investor Action" means a private damages action brought against Defendant by or on behalf  
16 of one or more investors based on substantially the same facts as alleged in the Complaint in this  
17 action.

18           5.       Defendant agrees that she shall not seek or accept, directly or indirectly,  
19 reimbursement or indemnification from any source, including but not limited to payment made  
20 pursuant to any insurance policy, with regard to any civil penalty amounts that Defendant pays  
21 pursuant to the Final Judgment, regardless of whether such penalty amounts or any part thereof are  
22 added to a distribution fund or otherwise used for the benefit of investors. Defendant further agrees  
23 that she shall not claim, assert, or apply for a tax deduction or tax credit with regard to any federal,  
24 state, or local tax for any penalty amounts that Defendant pays pursuant to the Final Judgment,  
25 regardless of whether such penalty amounts or any part thereof are added to a distribution fund or  
26 otherwise used for the benefit of investors.

27           6.       Defendant waives the entry of findings of fact and conclusions of law pursuant to Rule  
28 52 of the Federal Rules of Civil Procedure.

1           7.       Defendant waives the right, if any, to a jury trial and to appeal from the entry of the  
2 Final Judgment.

3           8.       Defendant enters into this Consent voluntarily and represent that no threats, offers,  
4 promises, or inducements of any kind have been made by the Commission or any member, officer,  
5 employee, agent, or representative of the Commission to induce Defendant to enter into this Consent.

6           9.       Defendant agrees that this Consent shall be incorporated into the Final Judgment with  
7 the same force and effect as if fully set forth therein.

8           10.      Defendant will not oppose the enforcement of the Final Judgment on the ground, if  
9 any exists, that it fails to comply with Rule 65(d) of the Federal Rules of Civil Procedure, and hereby  
10 waives any objection based thereon.

11          11.      Defendant waives service of the Final Judgment and agrees that entry of the Final  
12 Judgment by the Court and filing with the Clerk of the Court will constitute notice to Defendant of its  
13 terms and conditions. Defendant further agrees to provide counsel for the Commission, within thirty  
14 days after the Final Judgment is filed with the Clerk of the Court, with an affidavit or declaration  
15 stating that Defendant has received and read a copy of the Final Judgment.

16          12.      Consistent with 17 C.F.R. 202.5(f), this Consent resolves only the claims asserted  
17 against Defendant in this civil proceeding. Defendant acknowledges that no promise or  
18 representation has been made by the Commission or any member, officer, employee, agent, or  
19 representative of the Commission with regard to any criminal liability that may have arisen or may  
20 arise from the facts underlying this action or immunity from any such criminal liability. Defendant  
21 waives any claim of Double Jeopardy based upon the settlement of this proceeding, including the  
22 imposition of any remedy or civil penalty herein. Defendant further acknowledges that the Court's  
23 entry of a permanent injunction may have collateral consequences under federal or state law and the  
24 rules and regulations of self-regulatory organizations, licensing boards, and other regulatory  
25 organizations. Such collateral consequences include, but are not limited to, a statutory  
26 disqualification with respect to membership or participation in, or association with a member of, a  
27 self-regulatory organization. This statutory disqualification has consequences that are separate from  
28 any sanction imposed in an administrative proceeding. In addition, in any disciplinary proceeding

1 before the Commission based on the entry of the injunction in this action, Defendant understands that  
2 she shall not be permitted to contest the factual allegations of the complaint in this action.

3 13. Defendant understands and agrees to comply with the terms of 17 C.F.R. § 202.5(e),  
4 which provides in part that it is the Commission's policy "not to permit a defendant or respondent to  
5 consent to a judgment or order that imposes a sanction while denying the allegations in the complaint  
6 or order for proceedings," and "a refusal to admit the allegations is equivalent to a denial, unless the  
7 defendant or respondent states that he neither admits nor denies the allegations." As part of  
8 Defendant's agreement to comply with the terms of Section 202.5(e), Defendant: (i) will not take  
9 any action or make or permit to be made any public statement denying, directly or indirectly, any  
10 allegation in the complaint or creating the impression that the complaint is without factual basis; (ii)  
11 will not make or permit to be made any public statement to the effect that Defendant does not admit  
12 the allegations of the complaint, or that this Consent contains no admission of the allegations, without  
13 also stating that Defendants do not deny the allegations; (iii) upon the filing of this Consent,  
14 Defendant hereby withdraws any papers filed in this action to the extent that they deny any allegation  
15 in the complaint; and (iv) stipulates solely for purposes of exceptions to discharge set forth in Section  
16 523 of the Bankruptcy Code, 11 U.S.C. § 523, that the allegations in the complaint are true, and  
17 further, that any debt for disgorgement, prejudgment interest, civil penalty or other amounts due by  
18 Defendant under the Final Judgment or any other judgment, order, consent order, decree or settlement  
19 agreement entered in connection with this proceeding, is a debt for the violation by Defendant of the  
20 federal securities laws or any regulation or order issued under such laws, as set forth in Section  
21 523(a)(19) of the Bankruptcy Code, 11 U.S.C. § 523(a)(19). If Defendant breaches this agreement,  
22 the Commission may petition the Court to vacate the Final Judgment and restore this action to its  
23 active docket. Nothing in this paragraph affects Defendant's: (i) testimonial obligations; or (ii) right  
24 to take legal or factual positions in litigation or other legal proceedings in which the Commission is  
25 not a party.

26 14. Defendant hereby waives any rights under the Equal Access to Justice Act, the Small  
27 Business Regulatory Enforcement Fairness Act of 1996, or any other provision of law to seek from  
28 the United States, or any agency, or any official of the United States acting in his or her official

1 capacity, directly or indirectly, reimbursement of attorney's fees or other fees, expenses, or costs  
2 expended by Defendant to defend against this action. For these purposes, Defendant agrees that  
3 Defendant is not the prevailing party in this action since the parties have reached a good faith  
4 settlement.

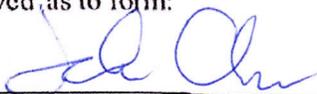
5 15. Defendant agrees that the Commission may present the Final Judgment to the Court  
6 for signature and entry without further notice.

7 17. Defendant agrees that this Court shall retain jurisdiction over this matter for the  
8 purpose of enforcing the terms of the Final Judgment.

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12 Dated: 4/16/2021

  
Bingqing Yang

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16 Approved, as to form:



17  
18 John Chu  
19 Corporate Counsel Law Group, LLP  
20 25 Kearney Street, Suite 302  
21 San Francisco, CA 94108-5515  
22 415-989-5300  
23 Attorney for Defendant  
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26  
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