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 8 KRISTA L. FREITAG

9 **UNITED STATES DISTRICT COURT**  
 10 **CENTRAL DISTRICT OF CALIFORNIA**  
 11 **WESTERN DIVISION**

12 SECURITIES AND EXCHANGE  
 13 COMMISSION,  
 14 Plaintiff,  
 15 v.  
 16 WORLD CAPITAL MARKET INC.;  
 WCM777 INC.; WCM777 LTD. d/b/a  
 17 WCM777 ENTERPRISES, INC.; and  
 MING XU a/k/a PHIL MING XU,  
 18 Defendants,  
 19 KINGDOM CAPITAL MARKET, LLC;  
 MANNA HOLDING GROUP, LLC;  
 20 MANNA SOURCE INTERNATIONAL,  
 INC.; WCM RESOURCES, INC.;  
 21 AEON OPERATING, INC.; PMX  
 JEWELS, LTD.; TOPACIFIC INC.;  
 22 TO PACIFIC INC.; VINCENT J.  
 MESSINA; and INTERNATIONAL  
 23 MARKET VENTURES,  
 24 Relief Defendants.

Case No. CV-14-2334-JFW-MRW  
 ASSIGNED FOR ALL PURPOSES TO  
 Judge John F. Walter  
 SUPPLEMENTAL DECLARATION OF  
 RECEIVER, KRISTA L. FREITAG IN  
 SUPPORT OF FIRST INTERIM FEE  
 APPLICATION OF KRISTA L.  
 FREITAG, FOR PAYMENT OF FEES  
 AND REIMBURSEMENT OF  
 EXPENSES

Date: November 10, 2014  
 Time: 1:30 p.m.  
 Ctrm: 16

1 I, Krista L. Freitag, declare:

2 1. I am the permanent receiver for Defendants World Capital Market Inc.,  
3 WCM777 Inc., and WCM777 Ltd. d/b/a WCM777 Enterprises, Inc., Relief  
4 Defendants Kingdom Capital Market, LLC; Manna Holding Group, LLC; Manna  
5 Source International, Inc.; WCM Resources, Inc.; ToPacific Inc.; To Pacific Inc.;  
6 and their subsidiaries and affiliates (collectively, "Receivership Entities").

7 2. On October 3, 2014, the First Interim Fee Application of Krista L.  
8 Freitag, Court-Appointed Receiver (the "Receiver's First Fee Application")  
9 [Dkt. 216], was filed with this Court and was set for hearing on November 10, 2014.

10 3. This Supplemental Declaration is made in support of the Receiver's  
11 First Fee Application and in response to the Court's observations and requested  
12 modifications to the invoices submitted by the Receiver, which invoices were  
13 attached as Exhibit A to the Receiver's First Fee Application [Dkt. 216-1]. I have  
14 personal knowledge of the facts set forth herein and, if called as a witness, could and  
15 would testify to such facts under oath.

16 4. At the hearing on November 10, 2014, the invoices attached as  
17 Exhibit A to the Receiver's First Fee Application were reviewed for the purpose of  
18 identifying and writing off the following items: (a) travel-related fees and expenses,  
19 including meal charges. Below is a list of entries that I identified with regard to the  
20 travel-related fees and expenses. I have totaled the amount for the entries and then  
21 reduced the total fees and expenses originally requested to account for these  
22 write-offs.

23 5. As reflected in the table below, a total of \$5,667.53 of travel-related  
24 fees are hereby removed from the Receiver's First Fee Application.

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Date	Personnel	Category	Total Fee
3/27/2014	T. Hebrank	General Receivership	\$ 351.00
3/27/2014	T. Hebrank	General Receivership	117.00
3/27/2014	K. Freitag	General Receivership	79.65
3/28/2014	T. Hebrank	General Receivership	351.00
3/28/2014	G. Rodriguez	General Receivership	313.88
3/28/2014	A. Herren	General Receivership	31.50
4/1/2014	G. Rodriguez	Operations & Asset Sales	283.50
4/1/2014	K. Freitag	Operations & Asset Sales	265.50
4/4/2014	A. Herren	General Receivership	267.75
4/7/2014	G. Rodriguez	General Receivership	81.00
4/16/2014	K. Freitag	Operations & Asset Sales	331.88
4/16/2014	G. Rodriguez	General Receivership	141.75
4/17/2014	G. Rodriguez	General Receivership	364.50
4/25/2014	K. Freitag	Operations & Asset Sales	265.50
5/1/2014	K. Freitag	Operations & Asset Sales	398.25
5/2/2014	A. Herren	General Receivership	31.50
5/9/2014	K. Freitag	Operations & Asset Sales	265.50
5/13/2014	A. Herren	General Receivership	102.38
5/15/2014	K. Freitag	Operations & Asset Sales	265.50
5/23/2014	K. Freitag	Operations & Asset Sales	265.50
6/10/2014	K. Freitag	Operations & Asset Sales	398.25
6/10/2014	A. Herren	Operations & Asset Sales	78.75
6/13/2014	G. Rodriguez	Operations & Asset Sales	232.88
6/16/2014	A. Herren	Operations & Asset Sales	118.13
6/20/2014	K. Freitag	Operations & Asset Sales	265.50
<b>Total</b>			<b>\$ 5,667.53</b>

6. Additionally, a total of \$1,735.41 of travel-related expenses are hereby removed from the Receiver's First Fee Application. This total represents the entirety of the original "Transportation/Parking" expense category in the amount of \$1,487.25, and a portion of the original "Other Misc." expense category in the amount of \$248.16.

7. The original fee application sought approval of \$216,117.23 in fees and \$36,885.97 in expenses. Based upon the foregoing, the Receiver now seeks approval for the following amounts:

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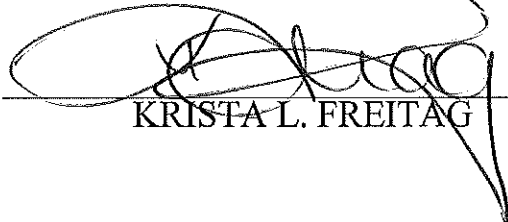
7.1. Fees \$ 210,449.70 (\$216,117.23 less \$5,667.53)

7.2. Costs \$ 35,150.56 (\$36,885.97 less \$1,735.41)

In accordance with the Receiver's First Fee Application, the Receiver therefore requests payments on an interim basis, of 80% of fees incurred for \$168,359.76 and 100% of the expenses incurred for \$35,150.56.

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

Executed this 13th day of November, 2014, at Concord, New Hampshire.

  
KRISTA L. FREITAG