

1 DAVID R. ZARO (BAR NO. 124334)
TED FATES (BAR NO. 227809)
2 TIM C. HSU (BAR NO. 279208)
ALLEN MATKINS LECK GAMBLE
3 MALLORY & NATSIS LLP
515 South Figueroa Street, Ninth Floor
4 Los Angeles, California 90071-3309
Phone: (213) 622-5555
5 Fax: (213) 620-8816
E-Mail: dzaro@allenmatkins.com
6 tfates@allenmatkins.com
7 thsu@allenmatkins.com

8 Attorneys for Court-appointed Receiver
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.
25
26
27
28

Case No. CV-14-2334-JFW-MRW

DECLARATION OF TIM C. HSU IN
SUPPORT OF EX PARTE
APPLICATION FOR ORDER
FREEZING REAL PROPERTY

Judge: Hon. John F. Walter

1 I, Tim C. Hsu, declare:

2 1. I am an attorney at the law firm of Allen Matkins Leck Gamble
3 Mallory & Natsis LLP, counsel of record for Krista L. Freitag ("Receiver"), Court-
4 appointed receiver for Defendants World Capital Market Inc. ("WCM"), WCM777
5 Inc., and WCM777 Ltd. d/b/a WCM777 Enterprises, Inc., Relief Defendants
6 Kingdom Capital Market, LLC; Manna Holding Group, LLC; Manna Source
7 International, Inc.; WCM Resources, Inc.; ToPacific Inc.; To_Pacific Inc.; and their
8 subsidiaries and affiliates (collectively, "Receivership Entities").

9 2. This Declaration is made in support of the Receiver's Ex Parte
10 Application for Order Freezing Real Property (the "Application").

11 3. On or around December 9, 2014, Ted Fates from our office contacted
12 Ming Xu's counsel Michael Volkov to request that Ming Xu agree to a stipulated
13 freeze of the real property located at 6812 Sultana Ave., San Gabriel, CA 91775 (the
14 "Property"), title to which is held in the name of Xiaomei Deng ("Deng"), the
15 mother of Ming Xu and his sister Sue Wang. On or around December 11, 2014, Ted
16 Fates from our office contacted Sue Wang's counsel, Marilyn Bednarski, to make
17 the same request that Sue Wang and her mother Deng agree to a stipulated freeze of
18 the Property. As of the date of this filing, we have not received any affirmative
19 response to the requests.

20 4. On December 11, 2014, I attempted to contact Deng directly at her
21 phone number as listed in her bank records at East West Bank. However, I was
22 unable to reach any person as Deng's phone number is no longer in service.
23 Concurrently with the filing of this Application, I sent Deng a copy of this
24 Application and all supporting documents by messenger to the Property, and sent a
25 separate copy via FedEx overnight delivery to 4026 Virginia Ave., Baldwin Park,
26 CA 91706, which pursuant to a property profile report, is a residential property
27 owned jointly by Deng and Sue Wang.

28

1 5. On December 11, 2014, I emailed counsel for plaintiff Securities and
2 Exchange Commission ("Commission"), defendant Ming Xu and relief defendants
3 Vincent J. Messina and International Market Ventures, as well as counsel for Sue
4 Wang, to provide notice pursuant to Local Rule 7-19.1 of the Receiver's intent to
5 file this Application. A true and correct copy of my email is attached hereto as
6 **Exhibit 1.**

7 6. I was informed by Commission that it does not intend to oppose the
8 Application. As of the date of this filing, I have received no indication from any of
9 the other noticed parties whether they intend to oppose the Application.

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

Executed this 12 day of December, 2014, at Los Angeles County, California.

/s/ Tim C. Hsu

TIM C. HSU

EXHIBIT 1

From: Hsu, Tim
Sent: Thursday, December 11, 2014 1:27 PM
To: 'bulgozdyj@sec.gov'; 'delgreco@sec.gov'; 'davidv@w-wlaw.com'; 'swellman@w-wlaw.com'; 'bwalgampaya@w-wlaw.com'; 'dlusby@volkovlaw.com'; 'elee@volkovlaw.com'; 'Michael Volkov'; 'rvermazen@hotmail.com'; 'mls@clydesnow.com'; 'maranda.fritz@thompsonhine.com'; 'mbednarski@kmbllaw.com'
Cc: Fates, Ted; Zaro, David
Subject: SEC v. WCM; C.D. Case No. cv-14-2334-JFW(MRWx); Receiver's Ex Parte Application for Order Freezing Real Property

Counsel:

I am writing to provide notice pursuant to Local Rule 7.19 that on Friday, December 12, 2014, the Receiver intends to file an ex parte application in the above-referenced matter to seek an order freezing the real property located at 6812 Sultana Ave., San Gabriel, CA 91775 (the "Property") and prohibiting any sale, transfer, or encumbrance of the Property. The Receiver's investigation shows that funds obtained from Receivership Entity ToPacific, Inc. were used to purchase the Property, title to which is held by Xiaomei Deng, Defendant Ming Xu's mother. Copies of the ex parte papers will be provided at the time of filing as required by Judge Walter's Standing Order. If you wish to oppose the Receiver's application, opposition papers must be filed no later than 24 hours after the filing of the ex parte application. Please advise immediately if you intend to oppose the Receiver's application.

Sincerely,

Tim C. Hsu
Allen Matkins Leck Gamble Mallory & Natsis LLP
515 South Figueroa Street, 9th Floor
Los Angeles, CA 90071
(213) 622-5555 - main
(213) 955-5516 - direct
(213) 620-8816 - fax
www.allenmatkins.com

Allen Matkins