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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.;
17 WCM777 INC.; WCM777 LTD. d/b/a
18 WCM777 ENTERPRISES, INC.; and
19 MING XU a/k/a PHIL MING XU,

20 Defendants,

21 KINGDOM CAPITAL MARKET,
22 LLC; MANNA HOLDING GROUP,
23 LLC; MANNA SOURCE
24 INTERNATIONAL, INC.; WCM
25 RESOURCES, INC.; AEON
26 OPERATING, INC.; PMX JEWELS,
27 LTD. TOPACIFIC INC.; TO
28 PACIFIC INC.; VINCENT J.
MESSINA; and INTERNATIONAL
MARKET VENTURES,

Relief Defendants.

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

**RESPONSE OF LAURA BACINICH
RE CLAIMS [ECF 467]**

Date: November 28, 2016
Time: 1:30 p.m.
Ctrm: 16-Spring St. Floor
Judge: Hon. John F. Walter

1 The Court on 13 October 2016, ordered the Receiver to file the Claims
 2 Objection Motion with a hearing date of November 28, 2016 and inform claimants
 3 that they have until November 7, 2016 to file their responses. (ECF Doc. No. 476)

4 Claimant, Laura Bacinich, tracking number 152375, submits this Response
 5 seeking a Court order establishing the basis of her investment in the amount of
 6 \$33,500, as described below.

7 Claimant invested monies with Defendants in the amounts as follows, as
 8 more fully described in her declaration filed herewith (See ¶¶ 3-7, Ex. 1, 2, 5, 16):

DATE OF PURCHASE	AMOUNT PAID	#OF UNITS
June 13, 2013	\$5,000.00	2.5
June 13, 2013	5,000.00	2.5
July 15, 2013	5,000.00	2.5
July 15, 2013	5,000.00	2.5
August 29, 2013	4,000.00	2.0
August 29, 2013	4,000.00	2.0
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TOTAL	\$28,000.00	

15 For each of these unit purchase transactions, Claimant received an order
 16 number as follows:

USERNAME	ORDER#
ljbella1	2050337
ljbella2	2050347
ljbella3	2050353
ljbella4	2050361
ljbella5	2050369
ljbella6	2100265
ljbella7	2100281
ljbella8	2100287
ljbella9	2100289
ljbella10	2100295
ljbella11	2100297
ljbella12	2207140
ljbella13	2207152
ljbella14	2207170
ljbella15	2207186

1 Claimant also gave cash money directly to Ming to purchase Topacific stock.
2 Claimant paid \$4,000.00 for 4,000 shares of Topacific Stock on October 29, 2013
3 \$1,500.00 for 1,000 shares of Topacific Stock on December 20, 2013. She received
4 the stock certificates online from WCM777 website.

5 The investments are depicted as follows:

6	October 29, 2013	\$4,000.00	Purchased 4,000 shares of Topacific Stock
7	December 20, 2013	\$1,500.00	Purchased 1,000 shares of Topacific Stock

8 (See Bacinich declaration ¶¶ 9-10, 17, and Ex. 2, 3).

9 **CONCLUSION**

10 In total, Claimant respectfully requests the Court recognize her investment of
11 \$33,500 when issuing an order approving distribution by the Receiver.

12 **AGUIRRE & SEVERSON, LLP**

14 Dated: November 7, 2016

15 /s/Maria C. Severson
16 Maria C. Severson, Esquire
17 Attorneys for
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