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10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

12  
13 **SECURITIES AND EXCHANGE**  
**COMMISSION,**

14 Plaintiff,

15 vs.

16 **WORLD CAPITAL MARKET, INC.,**  
17 **WCM777, INC., WCM777, LTD. dba**  
**WCM777 ENTERPRISES, INC., and**  
18 **MING XU a/k/a "PHIL" MING XU,**

19 Defendants,

20 and

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

27 Relief Defendants.  
28

Case No. 2:14-cv-02334-JFW-MRW

**PLAINTIFF SECURITIES AND**  
**EXCHANGE COMMISSION'S**  
**RESPONSE TO RECEIVER'S**  
**MOTION FOR APPROVAL OF SALE**  
**OF PAYMENTS DUE UNDER**  
**SETTLEMENT AGREEMENT WITH**  
**ZAYDA ABERIN AND ZHB**  
**INTERNATIONAL CORP.**

Date: July 24, 2017  
Time: 1:30 p.m.  
Place: Courtroom 7A  
(Hon. John F. Walter)

1 Plaintiff Securities and Exchange Commission (“SEC”) respectfully states that it  
2 supports the Motion of Krista L. Freitag, Court-Appointed Receiver, for Approval of  
3 Sale of Payments Due under Settlement Agreement with Zayda Aberin and ZHB  
4 International Corp. The Receiver took reasonable steps to monetize the future payments  
5 from the settlement agreement, which includes the risk of non-payment and possible  
6 costs of collection. In view of the fact that the Receiver is completing her work, this is a  
7 reasonable proposal to monetize this asset. As stated in the Receiver’s Motion, the SEC  
8 met and conferred prior to filing of the motion and concurred in the motion.

9  
10 Dated: July 10, 2017

Respectfully submitted,

11  
12 /s/ John B. Bulgozdy  
13 John B. Bulgozdy  
14 Peter DelGreco  
15 Attorneys for Plaintiff  
16 Securities and Exchange Commission  
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**PROOF OF SERVICE**

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION,  
444 S. Flower Street, Suite 900, Los Angeles, California 90071  
Telephone No. (323) 965-3998; Facsimile No. (213) 443-1904.

On July 10, 2017, I caused to be served the document entitled **PLAINTIFF SECURITIES AND EXCHANGE COMMISSION’S RESPONSE TO RECEIVER’S MOTION FOR APPROVAL OF SALE OF PAYMENTS DUE UNDER SETTLEMENT AGREEMENT WITH ZAYDA ABERIN AND ZHB INTERNATIONAL CORP.** on the parties to this action addressed as stated on the attached service list:

**OFFICE MAIL:** By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency’s practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

**PERSONAL DEPOSIT IN MAIL:** By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

**EXPRESS U.S. MAIL:** Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

**HAND DELIVERY:** I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

**UNITED PARCEL SERVICE:** By placing in sealed envelope(s) designated by United Parcel Service (“UPS”) with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

**ELECTRONIC MAIL:** By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

**E-FILING:** By causing the document to be electronically filed via the Court’s CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

**FAX:** By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

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

Date: July 10, 2017

/s/ John B. Bulgozdy

John B. Bulgozdy

