

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

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

WORLD CAPITAL MARKET INC, et al.,

Defendants.

**PRO SE OBJECTION TO RECEIVER'S
DECISION TO DISALLOW CLAIM**

COMES NOW Amalasothy Michael Croos, *pro se*, an interested party and investor/victim in this case, identified by the Receiver as “tracking number” 134654, and I hereby object to the Receiver’s recommendation to disallow my claim in the amount of \$10,000. In support of my objection, I respectfully offer the following facts.

1. In 2013, I was persuaded to become an investor in what I later learned was a ponzi scheme which is the subject of this litigation. I deposited cash into a Bank of America account on two occasions. On October 23,

2013, I deposited \$2,000 cash and on November 21, 2013, I deposited \$7,000 cash. See Exhibit A, attached.

2. At the time I made these deposits, I wrote down the name and account number for the Bank of America account. The account holder name was “Juan Montero,” and the account number was 488033401641. See Exhibit B, attached.

3. I received a “Unity Card” in my name reflecting my investment. See Exhibit C, attached.

OBJECTION

I have read the Receiver’s “Notice of Motion and Motion for Order” filed on October 14, 2016. Doc. 477. In the Receiver’s motion are several explanations for why 84.6% of the investor claims are recommended to be disallowed, including “insufficient bank record support.” Motion, p. 6. In describing the category of insufficient bank record support, the Receiver gave an example of “a copy of a deposit slip into a non-defendant entity bank account with no indication of the recipient name.” Motion, p. 6, footnote 3.

Bank of America deposit slips do not print the name of the account holder, which I suspect caused the Receiver to disallow many claims. However, I ask that my contemporaneous note (Exhibit B) of the account holder name and full account number be considered in support of my claim.

The Receiver also advised the Court that investor claims were disallowed because the invested funds “may or may not have ever reached the Receivership Entities.” Motion, p. 12. However, I ask that the Court and the Receiver consider the issuance of the “Unity Card” in my name (Exhibit C) as evidence that my investment did reach the “Receivership Entities.”

WHEREFORE, the undersigned investor asks the Court to grant his objection to the Receiver’s recommendation to disallow his claim, and asks that his claim be categorized as “allowed.”

Respectfully submitted,

/s/Amalasothy Michael Croos
Amalasothy Michael Croos
Pro Se

CERTIFICATE OF SERVICE

On this 4th day of November, 2016, the Interested Party herein served Receiver’s Counsel, Edward Fates, of Allen Matkins Leck Gamble Mallory & Natisis LLP with its Objection to Receiver’s Decision to Disallow Claim, via email to tfates@allenmarkins.com.

/s/Amalasothy Michael Croos
Amalasothy Michael Croos
Pro Se

Bank of America

Customer Receipt

All items are credited subject to verification, collection, and conditions of the Rules and Regulations of this Bank and as otherwise provided by law. Payments are accepted when credit is applied to outstanding balances and not upon issuance of this receipt. Transactions received after the Bank's posted cut-off time on Saturday, Sunday, and Bank Holidays, are dated and considered received as of the next business day.

Please retain this receipt until you receive your account statement.

Thank you for banking with Bank of America.
Save time with fast, reliable deposits, withdrawals, transfers and more at thousands of convenient ATM locations.

Tran 00058 10/23/2013 15:44
Entity MKS CC 0003120 TR 00006
Account *****164B
R/TR 540740134
Deposit \$2,000.00

DEPOSITO A Juan

*12345678
9876543210*

Member FDIC
95-14-2005B 10-2012

118802090272 91

Bank of America

Customer Receipt

All items are credited subject to verification, collection, and conditions of the Rules and Regulations of this Bank and as otherwise provided by law. Payments are accepted when credit is applied to outstanding balances and not upon issuance of this receipt. Transactions received after the Bank's posted cut-off time on Saturday, Sunday, and Bank Holidays, are dated and considered received as of the next business day.

Please retain this receipt until you receive your account statement.

Thank you for banking with Bank of America.
Save time with fast, reliable deposits, withdrawals, transfers and more at thousands of convenient ATM locations.

Tran 00014 11/21/2013 12:00
Entity MKS CC 0003120 TR 00006
Account *****1641
R/TR 540740134
Deposit \$7,000.00

Member FDIC
95-14-2005B 10-2012

Exhibit A

[Faint, illegible handwriting]

Juan Montero

Bank of America

488033401641

Dallas, TX

[Empty lined area]

Exhibit B

Not yet a Qi? click icon to join



Welcome back, Amalasothy M Croos!

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[Home](#)

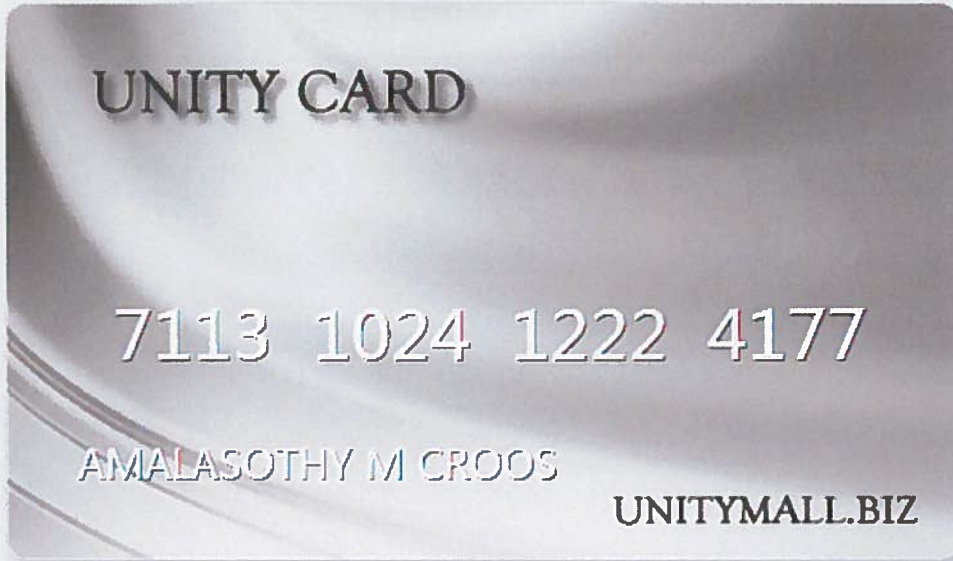
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Exhibit C