

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
thsu@allenmatkins.com

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

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

DECLARATION OF TIM C. HSU IN
SUPPORT OF EX PARTE
APPLICATION FOR ORDER
AUTHORIZING SALE OF
ADDITIONAL PERSONAL
PROPERTY (MANA FASHION
GARMENTS)

Ctrm: 16
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 Authorizing Sale of Additional Personal Property (MaNa
11 Fashion Garments) (the "Application").

12 3. On November 4, 2014, I emailed counsel for plaintiff Securities and
13 Exchange Commission ("Commission"), defendant Ming Xu and relief defendants
14 Vincent J. Messina and International Market Ventures, to provide notice pursuant to
15 Local Rule 7-19.1 of the Receiver's intent to file this Application. A true and
16 correct copy of my email is attached hereto as Exhibit 1.

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

20
21 I declare under penalty of perjury under the laws of the State of California
22 that the foregoing is true and correct.

23 Executed this 5 day of November, 2014, at Los Angeles County, California.

24
25
26
27
28

/s/ Tim C. Hsu

TIM C. HSU

EXHIBIT 1

Lyons, Marcella

From: Hsu, Tim
Sent: Tuesday, November 04, 2014 8:30 AM
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'; 'vermazen@hotmail.com'; 'mls@clydesnow.com'; maranda.fritz@thompsonhine.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 authorization to sell personal property

Counsel:

I am writing to provide notice pursuant to Local Rule 7.19 that on Wednesday, November 5, 2014, the Receiver intends to file an ex parte application in the above-referenced matter to seek authorization for the sale of personal property consisting of various garments out of receivership. 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 if you intend on opposing 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