

Club Leaders and Individual Investors  
July 20, 2010

**RICHARD WEISSMAN**  
**Receiver**  
12121 Wilshire Blvd.  
Suite 600  
Los Angeles, CA 90025  
Tel: (310) 481-6780  
Fax: (310) 481-6786

In Reply Reference:  
77949/900

July 20, 2010

TO: Club Leaders and Individual Investors

RE: SEC v. Sun Empire, LLC, Sun Commerce and Investment, Empire Club, LLC, et al.: Infinity Club LLC, Tycoon Club International LLC, Sun Celebrity LLC, Sun Quest LLC

Subject: Notice of Continuing Fraudulent Investment Activity

Dear Club Leaders and Investors:

After this action was filed and the Court issued a preliminary injunction prohibiting such activity, it has come to light that certain individuals associated with Delilah Proctor appear to have continued to solicit overseas "investments" from individuals which appear to be fraudulent.

Based upon evidence submitted by the Securities and Exchange Commission's motion for summary judgment against Delilah Proctor, certain individuals, including Delilah Proctor, Proctor's daughter, Joy Bridwell ("Bridwell"), Gilberto ("Bert") DelaCruz ("DelaCruz"), and Jason Kuruso, also known as Raymond White ("Kuruso"), individually and on behalf of Kuruso's entity, Recommended Services, have been promoting offshore investments in or through an entity known as "Global Reserve and Finance" ("Global Reserve").

Global Reserve is reputed to be a New Zealand corporation, offering a "Small Investment Program " which is supposed to generate returns on investment ("ROI") of as much as 50%-100% a month for twelve months with rollovers. This "program" requires the client to invest through an international business corporation in Panama, which corporation creates a bank account in New Zealand. The investor is supposed to wire his funds to his own bank account with Global Reserve Finance Ltd in New Zealand. As represented to investors, the funds are purportedly held in a blocked account for 12 months, during which time the funds are "chosen"

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July 20, 2010

to participate in one of Global Reserve's so-called "investment opportunities." Global Reserve maintains a website for customers which purports to provide online account statements and information regarding the investor's account. The Receiver has been advised that certain investors in Global Reserve have not received the promised ROI and have been unable to get a refund or return of their investments. Based upon information provided by investors, it appears that investors may have invested hundreds of thousands of dollars in Global Reserve.

Kuruso and Proctor were involved in other purported overseas banks known as Singbanc, First Pacific Bancorp and Asia Pacific Bancorp. In a document prepared by Kuruso in connection with the SEC v. Sun Empire Case, Mr. Kuruso stated that Singbanc and Asia Pacific were nothing more than websites; that there were no real banking institutions and no legitimate investment programs. A copy of the document filed by Mr. Kuruso containing these admissions is attached hereto.

This letter is sent to advise you that: (1) Proctor, Bridwell, Delacruz and Kuruso may be continuing their illegal solicitation of investors for fraudulent investment programs, possibly through Global Reserve; and (2) you should be extremely cautious regarding any investment suggested or offered by these individuals or entities.

By this letter I am also requesting that, if you or anyone you know has been solicited and/or has any information or documents related to Global Finance, Singbanc, First Pacific Bancorp, or any investment proposals from the individuals named above, please contact me or Dipo Fashakin at the number listed above. Alternatively, you can email me at [dfashakin@rwreceiver.com](mailto:dfashakin@rwreceiver.com) and provide me with any information you may have.

On prior occasions, I have requested that you, the investors, provide me with whatever information you may have regarding a number of entities and individuals which may have profited as a result of the fraudulent investment schemes operated by Bich Quyen Nguyen, Johnnie Johnson, Delilah Proctor and other named defendants. These entities and individuals include Sun Empire/Empire Club, Baja Sand and Gravel, attorney Dan Cross and the firm of Troutman Sanders.

Through my investigation, I have also confirmed that a number of additional entities and individuals appear to have received investors' funds. These entities include the Campbell River Group, Business Diversity Corp., Dynasco, Gold Sun, Prime Capital Holdings and Geo-K Mining Company ("Third Party Recipients").

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July 20, 2010

The aggregate losses incurred as a result of all of the Proctor-related activities was recently quantified by the SEC in the approximate amount of \$21 Million. In light of the Defendants' claim that they have no assets, it now appears that there will be only a very limited amount of funds available to distribute to all investors from the funds recovered to date.

Recovery from Third Party Recipients may provide a source for additional funds to repay investors. However, without your assistance, it will be very difficult to successfully assert claims against the Third Party Recipients. For this reason, we again urge all investors to provide me with any and all information and documents you have which relate in any fashion to these entities and individuals. Without your assistance, the potential for any significant recovery of your funds is minimal.

Very truly yours,

A handwritten signature in cursive script that reads "Richard Weissman". The signature is written in black ink and is positioned above a horizontal line.

Richard Weissman,  
Receiver

1 **OPP**

2 Recommended Services, Inc.

3 POB 27740 Las Vegas NV 89126

4 *In Proper Person*

5 **UNITED STATES DISTRICT COURT**

6 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

7 SECURITY AND EXCHANGE COMMISSION,

8 Plaintiff,

9 vs.

10 SUN EMPIRE, LLC. ECAM, LLC. a/k/a EMPIRE

11 CAPITAL ASSET 20MANAGEMENT, DELILAH

12 A PROCTOR, SHAUNTEL A. MCCOY, SUN

13 INVESTMENT SAVINGS AND LOAN, SUN GROUP

14 BICH QUYEN NGUYEN, AND JOHNNY E. JOHNSON

15 Defendants.

16 SUN COMMERCE AND INVESTMENT,

17 INFINIINVESTMENT CLUB, LLC. SUNLAND

18 INVESTMENT CLUB, LLC. RECOMMENDED

19 SERVICES, INC. AND TYCOON CLUB

20 INTERNATIONAL, LLC.

21 Relief Defendants.

) Case No: SACV09-399 DOC

) **ASSIGNED JUDGE:**  
) **HON. DAVID O. CARTER**

) **HEARING DATE: 3/15/2010**  
) **TIME: 8:30A.M.**

) **411 WEST FOURTH ST**  
) **SANTA ANA CA 92701**

) **OPPOSITION & REBUTTAL**  
) **to Notice of Motion and Motion**  
) **for Order:**

) **(1) Approving Receiver's first**  
) **interim report and second**  
) **interim report and first account;**  
) **Declaration of Relief Defendant**  
) **Recommended Services,**  
) **Raymond White, AKA Jason**  
) **Kuruso in opposition to**  
) **suppositions, Errors in**  
) **statements and**  
) **mischaracterizations in**  
) **receiver's motion.**

22 TO: The Honorable David O. Carter, United States District Court, Interested Parties and Counsel  
23 of Record: Comes Now, Relief Defendant, Recommended Services, in proper and moves the court  
24 to file a opposition to error in comments, written statements and mischaracterizations pertaining to  
25 Raymond White, aka Jason Kuruso, Recommended Services, First Pacific Bancorp, Singbanc and  
26 Asia Pacific Private Banc & Trust submitted by Receiver's motion for orders: Approving  
27 Receivers first Interim Report and second interim report and first account, specifically referencing  
28 Exhibit 4 of the Interim reports.

1 In the Receivers First Interim Report presented to the court that Relief Defendant received  
2 a copy of on February 16, 2010. The report is highly flawed and contains a number of incorrect  
3 errors in statements, inflated amount of funds received by Recommended Services and  
4 mischaracterization made in reference to the roles and descriptions of Relief Defendant,  
5 Recommended Services, Raymond White aka Jason Kuruso, First Pacific Bancorp, Asia Pacific  
6 Private Banc & Trust and Singbanc. Relief Defendant contends that this entire report contains  
7 omissions in errors, misaligned suppositions, unsubstantiated comments, and errors in written  
8 statements all without any factual supporting evidence. Receiver's Exhibit 5 the receiver attempts  
9 to off load the responsibility for the accountability of missing funds to relief defendant without  
10 any supporting factual evidence. Due to the short time span of involvement with Ms. Proctor  
11 (ECAM) and the time line of events it would not have been possible to carry out even a portion of  
12 the transactions as proposed in Exhibit 4 of the receivers report. Relief Defendant gave sworn  
13 testimony to the statements and rebuttals listed in Relief Defendant's opposition Motion. On  
14 January 29, 2010, Relief Defendant gave a sworn deposition to Molly White, Esq., in respond to  
15 the majority of the allegations listed herein relief Dependent instant opposition motion. Relief  
16 Defendant's introduction and association with Ms. Proctor (hereinafter as "ECAM") was on a  
17 limited part time basis for two months from the end of February to first week in April, 2009 when  
18 Relief Defendant accounts were frozen by the SEC.

19 Receivers Interim Report, Exhibit 5, Page 19, Line 13, the Receiver states that  
20 Recommended Services received a distribution of \$1.1 million dollars. There is no evidence of  
21 this ever occurring other than hearsay. Relief Defendant is without knowledge and belief, and  
22 therefore denies the allegation as stated. Due to the limited time of acquaintance with Ms. Proctor  
23 (ECAM) and Relief Defendant, and the time line of events with the immediate freezing of Relief  
24 Defendant's account by the SEC, makes it impractical for Relief Defendant to have received funds  
25 as stated by the Receiver.

26 Receivers Report, Exhibit 5, Page 38, Lines 11&13, the Receiver states that Proctor is a  
27 principal in Singbanc. Relief Defendant Agrees that prior to any knowledge of Mr. Proctor  
28 investment activities she was named as President of Singbanc "web site" as a symbolic gesture

1 only to embellish the image of the web site. The company does not have a bank account, offices,  
2 or employees. She was not paid a salary, did not have a staff, office, or job description and no  
3 duties were ever performed on behalf of the web site company.

4 Receivers Interim Report, Exhibit 5, Page 38, Lines 27 &28, and Page 39 Lines 1 through  
5 10 The Receiver states First Pacific Bancorp is a Nevada Corporation. First Pacific is a registered  
6 New Zealand Corporation and not a Nevada corporation. Receiver's report go on to state that  
7 Ms. Proctor appears to be a officer in the company. Ms. Proctor has no role or involvement in First  
8 Pacific Bancorp.

9 In Receiver's second Interim Report, Exhibit 5, page 39, Lines 11 through 15 Receiver's  
10 Interim report, goes on to state that it is possible that \$1,730,000 in investors funds alleged to  
11 have been transferred to Recommended Services and may have been transferred to First Pacific  
12 Bancorp, SingBanc or Asia Pacific Private Banc & Trust. Relief Defendant contends that the  
13 above statements are without any substantiating evidence. The above companies are banks in  
14 name only and not official operational licensed banks or corporations and serve as web sites only  
15 and have no bank accounts anywhere on the globe. Relief Defendant denies receiving any addition  
16 funds. No funds other than the \$1,070.00 which has been fully accounted for and reclaimed by  
17 the Receiver. Additional statements listed on page 39, Exhibit 5, Lines 1 through 10 are all  
18 misleading in terms of the actual facts and activities of the Recommended Services, Asia Pacific  
19 Private Banc & Trust, Singbanc and First Pacific Bancorp soliciting investors to offer any type of  
20 Certificates of Deposits. Due to exposure to many Certificate of Deposit providers on the internet.  
21 Relief Defendant agreed to accept a interim deposit check (not an investment) in the total amount  
22 of \$1,07,000.00 to purchase a certificate of deposit from a third party provider and agree to  
23 perform a introductory services in person for ECAM to the proposed Certificate of Deposit  
24 providers who were located in Hong Kong. Relief Defendant agreed to travel to Hong Kong with  
25 Proctor (ECAM) to purchase a Certificate of Deposit in the amount of the two checks deposited  
26 \$1,070,000.00 from one of the providers Relief Defendant met over the internet. Relief Defendant  
27 and Ms. Proctor traveled to Hong Kong and met with the proposed Certificate of deposit  
28 providers. Upon meeting with the CD providers it was concluded by Proctor and Relief Defendant

1 that the offers were fraudulent and the deal did not take place as evidence with the documentation  
2 submitted to the SEC and the frozen funds in Relief Defendant account. Relief Defendant did not  
3 received funds for these services. Inasmuch Relief Defendant paid his own air fare, hotel and  
4 eating expenses during his stay in Hong Kong. Exhibit 1 of Relief Defendant opposition and  
5 subsequent rebuttal provides a full release letter provided by the Receiver for the bank to release  
6 the funds from Relief Defendant account. In the letter again, Relief Defendant informed the  
7 Receiver that the two (2) checks was all the funds received and subsequently requested once the  
8 amount was taken back a release of the remaining amounts would be released to Relief Defendant.  
9 The account with \$800.00 was released however the account with \$35,000.00 is still frozen and  
10 Relief Defendant is unable to access the funds as evidence by a letter from the Receiver in  
11 Relief Defendant Exhibit 2.

12 Receivers Interim Report, Exhibit 5, Pages 37 and 38, Lines 21 through 28 and Page 39  
13 Lines 1 through 18, references the overall descriptions of the information listed on the web sites for  
14 Recommended Services, First Pacific Bancorp, Asia Pacific Private Banc & Trust and Singbanc.  
15 The Receiver and the SEC has mistakenly taken the information listed on the web site as factual  
16 for Real Operating Companies directed at offering services to the Public. None of the companies  
17 listed herein have employees, bank accounts and/or business offices other than a virtual office for  
18 Relief Defendant, Recommended Services.

19 Additionally, no income has been reported to the Internal Revenue Service for any of the  
20 companies, as per filed federal tax returns. These company's are described as shell companies  
21 with web sites only. The purpose of the web sites is to provide information and education to drive  
22 traffic to the site for the sole purpose of attracting future buyers for the web sites. It is not an  
23 uncommon practice to customize a web sites in advance to fit the business model of a potential  
24 buyer that is already in the financial services business and will not have to make lots of changes  
25 when the site is acquired. The web sites are target to the type of buyer it would like to attract and  
26 is customize with the type of embellished terminology and educational information to fit the  
27 future potential buyer. Each of these web sites are for the sole purpose of marketing the web sites  
28 not the information listed on the web sites. The information listed on the web sites are not to

1 solicit clients or investors for any type of services or funds, Page 38, Lines 20 through 26, in  
2 Receiver's interim Report, Exhibit 5, states that Relief Defendant admitted in a phone  
3 conversation that it could have received \$2.8 million dollars from the Infinity Club, Tycoon Club,  
4 and Sun Quest Investment Club. Relief Defendant denies having knowledge or contact with any of  
5 these clubs or its members other than Ms. Proctor and therefore denies the allegation as contained  
6 in the report. Relief Defendant knows to the exact penny the amount of fund received from ECAM  
7 and denies making such statement. This is evidenced by the follow-up emails from the Receiver to  
8 the referenced telephone conversation to the Relief Defendant where there is no mention of a 2.8  
9 million dollar transaction. Reference Relief Defendant's email, Exhibit 2. Additionally, Relief  
10 Defendant has written correspondence to the Receiver immediately after the telephone  
11 conversation in which Relief Defendant described in detail the two (2) checks from ECAM in the  
12 amounts of \$295,000.00 and \$775,000.00, for a total of \$1,070,000.00 (see Relief Defendant  
13 exhibit 3). Due to Relief Defendant's limited involvement with Proctor (ECAM), no involvement  
14 with any other Plaintiffs, and the evidence of Relief Defendant's subpoenaed bank statements by  
15 the SEC on two (2) separate occasions, and the Receiver showing no other funds being transferred  
16 into the accounts by ECAM or anyone else in the Sun Group. Also, Relief Defendant has fully  
17 cooperated with the Receiver and SEC in the return of all funds received. Relief Defendant  
18 respectfully requests to the Court to take in consideration of the many misinterpretations  
19 erroneous statements given in the Receiver Exhibit 5 as to Relief Defendant's involvement in this  
20 transaction and misinterpretations of the web site companies to be real operating companies by the  
21 SEC and Receiver. Relief Defendant surmises that the receiver has relied on hearsay and  
22 incomplete information from third party participants without any supporting facts thus has made  
23 assumptions that are way off the mark as evidenced in the remarks and suppositions made exhibit  
24 5 of the interim report regarding the relief defendant. Receiver's second Interim report, exhibit 5,  
25 page 43, lines 20 & 21, states that Recommended Services allegedly received \$2,918,506.73 in  
26 investors funds. There is no evidence of the Relief Defendant receiving any funds other than the  
27 \$1,070,000. Relief Defendant is not in the business of soliciting or receiving investor funds and  
28

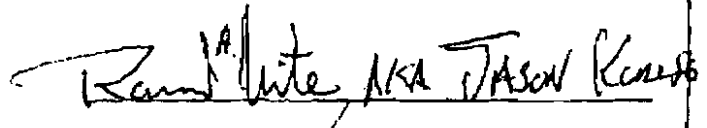


1 denies the existence of any other funds in any accounts listed under any other name any place on  
2 the globe.

3 Due to the lack of factual information and evidence of further involvement in this  
4 transaction other than what has been stated herein in regards to the Relief Defendant a plea for  
5 relief from the Court to order the release of the frozen account. Reference Relief Defendant's  
6 Exhibit 4, to the SEC requesting release of funds. With only two months involvement on a limited  
7 part time basis the Relief Defendant had the least amount of involved in this alleged scheme but is  
8 being targeted more so then the actual long term participants and without any sense of fairness.  
9 The SEC has subpoena the same information documents four times and has name the relief  
10 defendant on the Internet as participating in a Ponzi scheme where about an injustice was done.  
11 Financial web site businesses that have a high traffic volume sell for \$400,000.00 to \$500,000.00.  
12 The web sites businesses; First Pacific Bancorp, Asia Pacific Private Bank & Trust Company,  
13 Singbanc, were not registered or domicile in this country and would not have been sold to US  
14 citizens because the programs listed on the web sites are not available in this country. The above  
15 web sites alone with Recommended Services and Fargo Financial is shut down as well. It took a  
16 period of over four years hard work and long hours and cost over 350,000.00 in investors funds  
17 to build the web site business to the level it is today. The above web sites were closed down not  
18 because they did anything wrong but no one will buy a site or business that has been labeled as a  
19 ponzi scheme (Reference the relief defendants exhibit 5). What happen to innocent until proven  
20 guilty? No hard evidence other than the two returned check has been produced that the relief  
21 defendant was involved in any other way this is evidenced based on the Receiver's Interim second  
22 report and statements in exhibit 5, page 38, lines 11 through 19 that because information was  
23 listed and quoted from the web sites, there was no evidence indicating that the information and  
24 suppositions he quoted through out his report from the web site ever took place. Which the Relief  
25 Defendant confirmed in the explanations of his trip to Hong Kong with Ms. Proctor to purchase a  
26 CD from a third party provider and not from any of the web site companies.

1 Based on the miss understanding of the role of the companies and the limited involvement. A plea  
2 to the court to dissolve the Relief Defendant from further involvement in this scheme.

3  
4 DATED this 25 day of February, 2010.

5  
6 

7  
8 Original Signature

9 Raymond White AKA Jason Kuruso

10 Recommended Services

11 POB 27740 Las Vegas NV 89126

VERIFICATION

STATE OF NEVADA )

) ss:

COUNTY OF CLARK )

Raymond White aka Jason Kuruso, being duly sworn under penalty of perjury,  
deposes and says:

I am the Relief Defendant in the instant opposition statements listed in the Receivers motion for orders approving Receivers first and second Interim reports, specifically exhibit 5 of the second Interim report and I have read the foregoing and I believe them to be flawed and untrue. I am competent to testify to the facts as stated.

I DECLARE UNDER PENALTY OF PERJURY THE FOREGOING OPPOSITION TO STATEMENTS, COMMENTS AND SUPPOSITIONS LISTED IN THE RECEIVERS MOTION FOR ORDERS APPROVING RECEIVERS' FIRST INTERIM REPORT AND SECOND INTERIM REPORT, EXHIBIT 5 AND FIRST ACCOUNT. REBUTTAL IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Raymond White, AKA Jason Kuruso

Raymond White AKA Jason Kuruso

Recommended Services

POB 27740 Las Vegas NV 89126

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## CERTIFICATE OF MAILING

I, Jason Kuruso, declare under penalty of perjury I, mailed the foregoing opposition statements to the Reciver's first Interim and second Interim and first account reports ; by depositing in the USPS mailbox located in Las Vegas, Nevada on this 27 day February, 2010 to the following addresses:

Molly M. White, Esq.  
SEC  
5670 Wilshire Boulevard, 11<sup>th</sup> Floor  
Los Angeles, CA 90036

Melissa A. Buckhalter-Honore  
SEC  
5670 Wilshire Boulevard, 11<sup>th</sup> Floor  
Los Angeles, CA 90036

Richard Weissman, Esq. Receiver  
12121 Wilshire Boulevard, Suite 600  
Los Angeles. CA 90025

Alvin M. Gomez  
Gomez Law Group  
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San Diego, CA 92122

Jonathan Schwartz  
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Marina Del Rey, CA 90292

Infinity Investment Club  
Amy Chambers  
309 North Huber Drive  
Casper, WY 82609

Tycoon Club International, LLC  
c/o Ernesto Rodriguez  
631 West Katella Avenue, Suite 500  
Anaheim, CA 92802