

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(WEST PALM BEACH DIVISION)

CASE NO. 09-81087-CIV-HURLEY/HOPKINS
(Ancillary Proceeding to U.S.D.C. Case No. 08-81565-CIV-HURLEY/HOPKINS)

JONATHAN E. PERLMAN, Esq., as court
appointed Receiver of Creative Capital
Consortium, LLC, et al.,

Plaintiff,

v.

PATRICK ELIACIN, an individual,

Defendant.

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE

Plaintiff, JONATHAN E. PERLMAN, Esq., the court-appointed Receiver (the "Receiver") of Creative Capital Consortium, LLC and related receivership entities,¹ by and through his undersigned counsel, hereby responds to this Court's Order to Show Cause issued on April 8, 2010 [D.E. 9] and states as follows:

1. On July 27, 2009, the Receiver filed a Complaint against Patrick Eliacin (the "Defendant") as an ancillary proceeding to *Securities and Exchange Commission v. Creative Capital Consortium, LLC, A Creative Capital Concept\$, LLC and George L. Theodule*, Case No. 08-81565-CIV-HURLEY/HOPKINS, pending in the United States District Court, Southern District of Florida. [D.E. 1]

2. On September 23, 2009, the Defendant sent a letter to Steven M. Larimore, Clerk of the Court s/Gregory Maestre, Deputy Clerk, U.S. District Court, in which Defendant denied

¹ A Creative Capital Concept\$, LLC, United Investment Club, LLC, Reverse Auto Loan, LLC, G\$ Trade Financial, Inc., Unity Entertainment Group, Inc., Wealth Builders Circle, LLC and The Dream Makers Capital Investment, LLC.

the allegations of the Complaint. (“Defendant’s Response”)

3. On September 30, 2009, the Receiver filed a Notice of Filing with the Court, indicating that the Defendant had responded to the Complaint pro se and attaching Defendant’s Response. [D.E. 5]

4. Insofar as the Defendant’s Response has answered the Complaint by denying the allegations set forth therein, the Receiver requests that the instant case proceed as scheduled in accordance with the Court’s Trial Order issued on July 30, 2009. [D.E. 4]

Dated: April 19, 2010
Miami, Florida

Respectfully submitted,

By: /s/ David P. Lemoie
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Attorneys for Receiver Jonathan E. Perlman, Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via EM-ECF, e-mail, certified mail or U.S. Mail this 19th day of April, 2010 upon the parties listed on the attached service list as described.

By: /s/David P. Lemoie
David P. Lemoie, Esq.

SERVICE LIST

**JONATHAN E. PERLMAN, ESQ., as court appointed Receiver of Creative Capital
Consortium, LLC, et al. v. PATRICK ELIACIN
CASE NO. 09-81087-CIV-HURLEY/HOPKINS
United States District Court, Southern District of Florida**

Via U.S. Mail

Patrick Eliacin
1220 SW 103rd Avenue
Pembroke Pines, FL 33025
Defendant, Pro Se