

FILED by **OTS** D.C.
ELECTRONIC
Feb. 19, 2010
STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

**United States District Court
Southern District Of Florida
(West Palm Beach Division)
CASE NO. 09-80480-IV-HURLEY/HOPKINS**

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

Plaintiff,

V.

Dorothy Delisfort-Theodule, an individual,
Wealth Builders Circle, LLC, a Georgia limited liability
company, Caribbean Airways, LLC, a Florida limited
liability company, Donna Haver, Inc., a Florida limited
liability company, Good Buy Homes, Inc., a Florida corporation,
International Development of America, Inc., a Florida corporation, and
Complete Auto Repayment Solutions, Inc., a Georgia corporation,

Defendants.

1.
The defendant does not have sufficient knowledge to admit or deny paragraph one.
2.
The defendant does not have sufficient knowledge to admit or deny paragraph two.
3.
The defendant does not have sufficient knowledge to admit or deny paragraph three.
4.
The defendant does not have sufficient knowledge to admit or deny paragraph four.
5.
The defendant does not have sufficient knowledge to admit or deny paragraph five.
6.
The defendant does not have sufficient knowledge to admit or deny paragraph six.
7.
The defendant does not have sufficient knowledge to admit or deny paragraph seven.
8.
The defendant does not have sufficient knowledge to admit or deny paragraph one.
9.
The defendant admits to residing in Gwinnett County, in Georgia and admits to being the wife of Mr. George Theodule. The defendant denies all the other contents in paragraph nine.

10.

The defendant admits the statement in paragraph ten.

11.

The defendant does not have sufficient knowledge to admit or deny paragraph eleven.

12.

The defendant does not have sufficient knowledge to admit or deny paragraph twelve.

13.

The defendant does not have sufficient knowledge to admit or deny paragraph thirteen.

14.

The defendant does not have sufficient knowledge to admit or deny paragraph fourteen.

15.

The defendant admits the statement in paragraph fifteen.

16.

The defendant admits to being an officer of Wealth Builder's Circle, but denies all the other allegations in paragraph sixteen.

17.

The defendant does not have sufficient knowledge to admit or deny paragraph seventeen.

18.

The defendant denies the allegations in paragraph eighteen.

19.

The defendant does not have sufficient knowledge to admit or deny paragraph nineteen.

20.

The defendant does not have sufficient knowledge to admit or deny paragraph twenty.

21.

The defendant does not have sufficient knowledge to admit or deny paragraph twenty-one.

22.

The defendant does not have sufficient knowledge to admit or deny paragraph twenty-two.

23.

The defendant does not have sufficient knowledge to admit or deny paragraph twenty-three.

24.

The defendant does not have sufficient knowledge to admit or deny paragraph twenty-four

25.

The defendant does not have sufficient knowledge to admit or deny paragraph twenty-five.

26.

The defendant does not have sufficient knowledge to admit or deny paragraph twenty-six.

27.

The defendant does not have sufficient knowledge to admit or deny paragraph twenty-seven.

28.

The defendant denies the allegations in paragraph twenty-eight.

29.

The defendant denies the allegations in paragraph twenty-nine.

30.

The defendant denies the allegations in paragraph thirty.

31.

The defendant denies the allegations in paragraph thirty-one.

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32.

The defendant denies the allegations in paragraph thirty-two.

33.

The defendant denies the allegations in paragraph thirty-three.

34.

The defendant denies the allegations in paragraph thirty-four.

35.

The defendant does not have sufficient knowledge to admit or deny paragraph thirty-five.

36.

The defendant does not have sufficient knowledge to admit or deny paragraph twenty-seven.

37.

The defendant denies the allegations in paragraph thirty-seven.

38.

The defendant denies the allegations in paragraph thirty-eight

39.

The defendant denies the allegations in paragraph thirty-nine.

40.

The defendant denies the allegations in paragraph forty.

41.

The defendant denies the allegations in paragraph forty-one.

42.

The defendant denies the allegations in paragraph forty-two.

43.

The defendant denies the allegations in paragraph forty-three.

44.

The defendant does not have sufficient knowledge to admit or deny paragraph forty-four.

45.

The defendant does not have sufficient knowledge to admit or deny paragraph forty-five.

46.

The defendant does not have sufficient knowledge to admit or deny paragraph forty-six.

47.

The defendant does not have sufficient knowledge to admit or deny paragraph forty-seven.

48.

The defendant denies the allegations in paragraph forty-eight.

49.

The defendant denies the allegations in paragraph forty-nine.

50.

The defendant denies the allegations in paragraph fifty.

51.

The defendant denies the allegations in paragraph fifty-one.

52.

The defendant denies the allegations in paragraph fifty-two.

53.

Paragraphs one through 52 have been answered individually.

54.

The defendant does not have sufficient knowledge to admit or deny paragraph fifty-four.

55.

The defendant does not have sufficient knowledge to admit or deny paragraph fifty-five.

56.

The defendant does not agree with the statements in paragraph fifty-six.

57.

The defendant does not agree with the statements in paragraph fifty-sevens.

58.

The defendant denies the allegations in paragraph fifty-eight.

59.

The defendant denies the allegations in paragraph fifty-nine.

60.

The defendant denies the allegations in paragraph sixty.

61.

The defendant has answered to questions one through fifty-two individually.

62.

The defendant does not have sufficient knowledge to admit or deny paragraph sixty-two.

63.

The defendant does not have sufficient knowledge to admit or deny paragraph sixty-three.

64.

The defendant denies the allegations in paragraph sixty-four.

65.

The defendant denies the allegations in paragraph sixty-five.

66.

The defendant denies the allegations in paragraph sixty-six.

67.

The defendant has answered questions one-through fifty-two individually.

68.

The defendant does not have sufficient knowledge to admit or deny paragraph sixty-eight.

69.

The defendant denies the allegations in paragraph sixty-nine.

70.

The defendant does not have sufficient knowledge to admit or deny paragraph seventy.

71.

The defendant does not have sufficient knowledge to admit or deny paragraph seventy-one.

72.

The defendant does not have sufficient knowledge to admit or deny paragraph seventy-two.

73.

The defendant does not have sufficient knowledge to admit or deny paragraph seventy-three.

74.

The defendant denies the allegations in paragraph seventy-four.

75.

The defendant denies the allegations in paragraph seventy-five.

76.

The defendant has replied to questions one through seventy-five individually.

77.

The defendant denies the allegations in paragraph seventy-six.

78.

The defendant denies the allegations in paragraph seventy-eight.

79.

The defendant denies the allegations in paragraph seventy-nine.

80.

The defendant denies the allegations in paragraph eighty.

81.

The defendant denies the allegations in paragraph eighty-one.

82.

The defendant denies the allegations in paragraph eighty-two.

83.

The defendant has answered questions one through seventy-five individually.

84.

The defendant denies the allegations in paragraph eighty-eighty-four.

85.

The defendant denies the allegations in paragraph eighty-five.

86.

The defendant denies the allegations in paragraph eighty-six.

87.

The defendant denies the allegations in paragraph eighty-seven.

88.

The defendant denies the allegations in paragraph eighty-eight.

89.

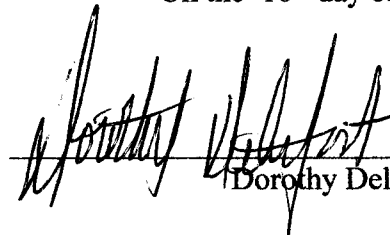
The defendant denies the allegations in paragraph eighty-nine.

Certificate of Service

I, certify that I mailed a copy of the foregoing defendant's answer to allegations to the to plaintiff's at:

Genovese, Joblove & Battista, P.A.
Miami Tower, 44th Floor
100 S.E. Second Street
Miami, FL 33131

On the 16th day of February 2010

 2/16/10

Dorothy Delisfort