

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

CASE NO. 09-80480-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.

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 ENTREPRENEURS
OF AMERICA, INC., a Florida corporation, and
COMPLETE AUTO REPAYMENT SOLUTIONS, INC.,
a Georgia corporation,

Defendants.

**PLAINTIFF'S DISCLOSURES OF WITNESSES AND EXHIBITS PURSUANT TO
RULE 26(A)(3) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Pursuant to Federal Rule of Civil Procedure 26(a)(3), Plaintiff Jonathan E. Perlman, Esq., the court-appointed Receiver (the "Receiver") of Creative Capital Consortium, LLC, et al. (the "Receivership Entities"), hereby makes the following pretrial disclosures of proposed witnesses and exhibits for trial in this matter:

I. Proposed Trial Witnesses.

1. Jonathan E. Perlman, Esq.
Court-appointed Receiver
Genovese Joblove & Battista
4400 Miami Tower
100 SE 2nd Street
Miami, FL 33131

2. Soneet R. Kapila., C.P.A.
Kapila & Co., Inc.
1009 South Federal Highway, Suite 200
Fort Lauderdale, FL 33316
3. Kathleen E. Strandell, Staff Accountant
Securities and Exchange Commission
801 Brickell Avenue, Suite 1800
Miami, Florida 33131
4. George Theodule
2108 New London Place
Snellville, Georgia
5. Dorothy Delisfort (Defendant)
2108 New London Place
Snellville, Georgia
6. Mario Theodule
c/o Stuart Reed, Esq.
Plantation, Florida
7. Evens Theodule
c/o Genovese Joblove & Battista,
4400 Miami Tower
100 SE 2nd Street
Miami, FL 33131
8. Yves Theodule
c/o Genovese Joblove & Battista,
4400 Miami Tower
100 SE 2nd Street
Miami, FL 33131
9. Yolette T. Williams c/o Barry Wax, Esq.
777 Brickell Avenue, Suite 1210
Miami, FL 33131
10. Kathryn Parker
2207 Shoma Drive
Royal Palm Beach, FL
11. Krissy McKeon
3943 West Hamilton Key
West Palm Beach, FL

12. Rock Sanozier
Plantation, Florida
13. Detra Pasby
Las Vegas, Nevada
14. Dan Harper
Orlando, Florida
15. Dan Lavan
Orlando, Florida
16. Tim Holly
Atlanta, Georgia
17. Carlos Bonilla
Orlando, Florida
18. Gerson Corominas
Orlando, Florida
19. Wanda Corominas
Orlando, Florida

II. Proposed Trial Exhibits

1. All documents to be produced by Dorothy Delisfort in response to the Receiver's presently pending First Request for Production of Documents.
2. Bank records and financial records of the Receivership Entities and George Theodore more specifically identified as follows:
 - a. Financial records belonging to the Receivership Entities turned over to the Receiver by the former accountant for Creative Capital;
 - b. Documents obtained from former employees of Creative Capital;
 - c. The books and records obtained from the corporate offices of the Receivership Entities;

- d. Bank records, including statements and documents supporting deposits and withdrawals for Creative Capital accounts at Washington Mutual Bank (“WaMu”), Wachovia Bank (“Wachovia”), and Bank of America (“BOA”), Suntrust Bank, N.A. (“SunTrust”), and Bank of North Georgia (“BNG”) including personal accounts for which George Theodule was an authorized signatory obtained by the Receiver;
 - e. Brokerage account statements for accounts at OptionsXpress, Inc. (“OptionsXpress”), thinkorswim, Inc. (“thinkorswim”), and TradeStation Securities, Inc. (“TradeStation”);
 - f. All documents referenced in the Receiver’s Affidavit in Support of the SEC’s Motion for Summary Judgment, including; Summary of bank and brokerage accounts; Summary of disbursements and Summary of Brokerage Account Activity (DE 173-2 , Case No. 08-CV-81565).
3. Bank records identifying transfers made from Creative Capital Consortium, LLC to the Defendants as set forth in the Amended Complaint and its attached Exhibits.
 4. All documents produced in response to discovery, responses to subpoenas and documents produced at any and all depositions.
 5. All documents identified by Defendants.
 6. All documents necessary for impeachment and/or rebuttal.
 7. All testimony given during the deposition of Defendant on February 9, 2009 and April 17, 2009 and statements made by the Defendant by sworn affidavit on March 16, 2009.

The Receiver reserves the right to amend the above disclosures of witnesses and exhibits based upon information obtained through ongoing discovery.

Dated: February 24, 2010

By: /s/ David P. Lemoie
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Jonathan E. Perlman, Esq.*

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2010, the foregoing document was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the below Service List, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ David P. Lemoie
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SERVICE LIST

**JONATHAN E. PERLMAN, ESQ., as court appointed Receiver of Creative Capital Consortium, LLC, et al.
v. DOROTHY DELISFORT THEODULE, et al.
CASE NO. 09-80480-CIV-HURLEY/HOPKINS
United States District Court, Southern District of Florida**

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Attorney for Yollette Williams

Via Certified Return Receipt Requested

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