

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

CASE NO. 09-22326-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.

LAKAY INVESTMENT, INC., a
Florida Corporation,

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 26, 2010 [DE 12] and states as follows:

1. On August 6, 2009, the Receiver filed a complaint (the "Complaint") against Lakay Investment, Inc. (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. [DE 1].

2. On August 19, 2009, the Registered Agent and President of the Defendant

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.

corporation, Daniel Madeus (“Madeus”), was duly served with the Summons and Complaint in this matter [DE 9].

3. On May 4, 2010, the Receiver filed his Motion for Clerk’s Default Against Defendant Lakay Investment, Inc. [DE 13]. The Clerk of the Court entered its Clerk’s Default against the Defendant, Lakay Investment Inc., on May 5, 2010. [DE 14].

4. The Receiver will proceed with filing a motion for default final judgment in this matter within thirty (30) days.

Dated: May 6, 2010
Miami, Florida

Respectfully submitted,

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Attorneys for Receiver Jonathan E. Perlman, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 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 Lemoie
David Lemoie, Esq.

SERVICE LIST

JONATHAN E. PERLMAN, ESQ., as court appointed Receiver of Creative Capital Consortium, LLC, et al. v. Lakay Investments, Inc.

CASE NO. 09-22326-CIV-HURLEY/HOPKINS

United States District Court, Southern District of Florida

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Via CM/ECF

Daniel Madeus, President

Registered Agent

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On behalf of the Defendant Lakay Investment, Inc.

Via U.S. Mail