

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.

RECEIVER'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Plaintiff Jonathan Perlman, the court appointed Receiver in the action styled Securities and Exchange Commission v. Creative Capital Consortium et al., Case No. 08-80480-CIV-HURLEY/HOPKINS, by and through undersigned counsel, hereby files this Motion to Compel the Production of Documents by Defendant Dorothy Delisfort-Theodule (the "Motion"), and in support thereof states:

1. On January 27, 2010, Plaintiff served upon the Defendant a Request for Production of Documents, pursuant to which Defendant was required to respond on or before February 29, 2010. A copy of the Plaintiff's Request for Production is attached hereto as Exhibit A.

2. Defendant has failed to respond to the Request or otherwise produce documents in response to the Request for Production.

WHEREFORE, the Receiver respectfully requests the Court enter an order compelling Defendant to respond to the Plaintiff's Request for Production and produce all documents requested in accordance therewith.

Dated: March 4, 2010
Miami, Florida

Respectfully submitted,

By: /s/ David Lemoie
David P. Lemoie
Florida Bar No.: 188311
dlemoie@gjb-law.com
David C. Cimo
Florida Bar No.: 775400
dcimo@gjb-law.com
Genovese Joblove & Battista, P.A.
4400 Miami Tower
100 Southeast Second Street
Miami, Florida 33131
Tel: (305) 349-2300
Fax: (305) 349-2310
*Attorneys for Receiver,
Jonathan E. Perlman, Esq.*

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2010, the foregoing document was served this day on all persons identified on the below Service List, by En-ECF, U.S. Mail or by e-mail.

/s/ David Lemoie
David Lemoie, Esq.
Florida Bar No. 188311

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**

<p>Dorothy Delisfort (<i>Pro Se</i> Defendant) 2108 New London Place Snellville, Georgia</p>	<p>Donna Haver, Inc. c/o Registered Agent George L. Theodule c/o Russell C. Weigel, III, Esq. Russell C. Weigel, III, P.A. 5775 Blue Lagoon Dr., Ste. 100 Miami, Florida 33126 Telephone: (786) 888-4567 Facsimile: (786) 787-0456 Via e-mail: rweigel@investmentattorneys.com <i>Attorneys for George L. Theodule</i></p>
<p>International Development Entrepreneurs of America, Inc. c/o Registered Agent George Theodule c/o Russell C. Weigel, III, Esq. Russell C. Weigel, III, P.A. 5775 Blue Lagoon Dr., Ste. 100 Miami, Florida 33126 Telephone: (786) 888-4567 Facsimile: (786) 787-0456 Via e-mail: rweigel@investmentattorneys.com <i>Attorneys for George L. Theodule</i></p>	<p>Complete Auto Repayment Solutions, Inc. c/o Dorothy Delisfort 2108 New London Place Snellville, Georgia</p>
<p>Good Buy Homes, Inc. c/o Registered Agent Yolette T. Williams c/o Barry Michael Wax, Esq. 800 Brickell Avenue, PH II Miami, FL 33131 Telephone: (305) 373-4400 Facsimile: (305) 381-7135 Via e-mail: barrywax@bellsouth.net <i>Attorney for Yollette Williams</i></p>	<p><u>Via Certified Return Receipt Requested</u></p> <p>Caribbean Airways, LLC c/o Registered Agent Frantz Vilce 10474 Boynton Place Cir., #633 Boynton Beach, FL 33437</p>

EX. “A”

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 FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DOROTHY DELISFORT-THEODULE**

Plaintiff, JONATHAN E. PERLMAN, Esq., the court-appointed Receiver (the
"Receiver") of Creative Capital Consortium, LLC and related receivership entities,¹ pursuant to
Rule 34 of the Federal Rules of Civil Procedure, hereby requests that **DOROTHY
DELISFORT-THEODULE** ("Defendant") produce all documents responsive to the requests
for production set forth below, within 30 days of the date of service thereof at the offices of

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.

Genovese Joblove & Battista, P.A., 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, FL 33301, or such other place as counsel may agree.

INSTRUCTIONS AND DEFINITIONS

I. Instructions

- A. This document request is continuing in nature and when new knowledge or information comes to the attention of the Defendants the information supplied in the answers to the document request shall be supplemented forthwith.
- B. For each and every Request herein, you shall produce documents in your possession, custody, or control, which shall include but not be limited to, documents, objects or articles described that are in your possession or that you have the right to secure the original or a copy from another person or entity. The fact that your investigation is continuing or discovery is incomplete is not an excuse for your failure to respond to each request as fully and completely as possible. Your responses should consist of information known to you through yourself, your agents, your attorneys, your employees, or your representatives. All documents produced pursuant to this request are to be produced as they are kept in the usual course of business, and shall be organized and labeled (without permanently marking the item produced) so as to correspond with the categories of each numbered request hereof. If copies or drafts exist of a document, the production of which has been requested herein, produce and submit for inspection and copying each and every copy and draft which differs in any way from the original document or from any copy or draft.
- C. If you at any time had possession, custody, or control of any document requested herein, and such document has been lost, destroyed, discarded, or is not presently in your possession, these documents shall be identified as completely as possible, including:
 - 1. The names of the authors of the document;
 - 2. The names of the persons to whom the documents or copies were sent;
 - 3. The date of the document;
 - 4. The date on which the document was received by each addressee, copyee or its recipients;
 - 5. A description of the nature and subject matter of the document that is as complete as possible;
 - 6. The date on which the document was lost, discarded or destroyed; and
 - 7. The manner in which the document was lost, discarded or destroyed.

- D. With respect to any document that Defendants withhold under claim of privilege, the Defendants shall number such documents, hold them separately, and retain them intact pending a ruling by the Court on the claimed privilege. In addition, the Defendants shall provide a statement, signed by an attorney representing the Defendants, setting forth as to each such document:
1. The names of the senders or the document;
 2. The names of the authors of the document;
 3. The names of the persons to whom the document or copies were sent;
 4. The job title of every person named in subparagraphs 1, 2 and 3 above;
 5. The date of the document;
 6. The date on which the document was received by each addressee, copyee or its recipient;
 7. A brief description of the nature and subject matter of the document; and
 8. The statute, rule or decision which is claimed to give rise to the privilege.
- E. If you cannot, after exercising due diligence to secure or produce the document(s) requested, you must identify which Request(s) that you do not have any responsive documents for, and answer the request for production to the fullest extent possible, specifying your inability to produce the document(s), providing the identity of the person who has possession, custody, or control of the requested document(s).
- F. All words in this Request shall have their plain and ordinary meanings unless specifically defined herein below in Part II of this Request.
- G. Copies of documents which are identical duplicates of other documents which have already been produced for inspection and copying in this action need not be produced again, except that the duplicates must be produced if handwritten or any other type of notes or similar intelligence appear thereon or are attached thereto, including markings on slips indicating the routing of the document to individuals or organizations.
- H. The singular and plural forms shall be construed interchangeably so as to bring within the scope of this document request any information which might otherwise be construed as outside their scope.
- I. "And" and "or" shall be construed interchangeably so as to bring within the scope of this document request any information which might otherwise might be construed as outside their scope.
- J. "Any" and "all" shall be construed to bring within the scope of this request any information which might be construed to relate to the subject matter of the request.
- K. The use of the singular form of any word includes the plural and vice versa.

- L. All other names or terms herein not specifically defined or identified shall have the same meaning as is commonly understood and referred to by and among the parties.
- M. Unless otherwise stated herein, the time period encompassed by this Request shall be from January 1, 2007.

II. Definitions

1. As used in this Request, the term "Defendants" shall include the Defendants and any of their affiliates, subsidiaries, assigns, authorized officers and directors, employees, agents, and others purporting to act on their behalf.

2. As used in this Request, the term "Receivership Entities" shall refer to Creative Capital Consortium, LLC, 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.

3. As used in this Request, the term "Dorothy Delisfort-Theodule" shall mean Dorothy Delisfort-Theodule, the individual as identified in the Amended Complaint, and any of her agents or assigns.

4. As used in this Request, the term "Complaint" shall mean the most recent Complaint or Amended Complaint filed by Plaintiff in this action against the Defendants.

5. As used in this Request, the term "CCG Transfers" shall mean those asset transfers from Creative Capital Concepts, LLC to the Defendants as identified in Paragraph 69 of the Amended Complaint.

6. The words "you," and "your" shall mean the party upon whom this request is being served and all of its affiliates, subsidiaries, assigns, authorized officers and directors, employees, agents, and others purporting to act on its behalf.

7. The word "person" shall mean any natural person, individual, proprietorship, partnership, corporation, association, organization, joint venture, business trust, or other business enterprise, governmental body or agency, legal or business entity, or group of natural persons, or other entity, whether *sui juris* or otherwise and includes both the singular and plural.

8. The terms "communication" and "communications" shall interchangeably mean any oral or written statement, dialogue, colloquy, discussion or conversation or exchange of information of any type, and any transfer of thoughts or ideas between any two or more persons, including but not limited to documents, telephone or face-to-face conversations, meetings, conferences, or transfer of data from one location to another by electronic or similar means.

9. The term “document” shall mean any kind of written, typed, recorded or graphic matter, however produced or reproduced, of any kind or description, whether sent or received, including originals, non-identical copies and drafts of both sides thereof, and including, but not limited to, papers, books, letters, correspondence, telegrams, bulletins, notices, announcements, instructions, charts, manuals, brochures, schedules, memoranda, notes, notations, transcripts, minutes, agendas, reports and recordings of telephone or other conversations, interviews, conferences, or other meetings, affidavits, statements, summaries, opinions, reports, studies, analysis, evaluations, contracts, agreements, journals, diaries, lists, tabulations, drawings, sketches, photographs, film, computer print-outs, data processing input/output, microfilms and all other records kept by electronic, photographic or mechanical means, and other things similar to any of the foregoing, including items in the possession, custody, or control of any other person, including your attorneys.

10. The word “correspondence” shall mean any and all letters, facsimiles, transmitted memoranda, memorialized oral communications, e-mails, or other communications or documents exchanged or transmitted with another person or entity.

11. The words “support,” “evidence,” “relate to,” “relating to,” “related to,” “referred to,” “concerning,” “pertaining to,” and “regarding” shall mean anything which directly, or indirectly, concerns, consists of, pertains to, reflects, evidences, describes, sets forth, constitutes, contains, shows, underlies, supports, refers to in any manner, is or was used in the preparation of, appended to, legally, logically or factually connected with, proves, disproves, or tends to prove or disprove.

DOCUMENTS REQUESTED

1. Any and all documents relating in any way to the Defendants’ business relationships with each or any of the Receivership Entities and/or George Theodule.

2. Any and all documents relating in any way to the Defendants’ business relationships with any business associates or relatives of George Theodule, including, but not limited to the following individuals and entities:

**Dorothy Delisfort
Yves Theodule
Mario Theodule
Evens Theodule
Paulette Theodule
George Julius Theodule
Chantal Simon
Michel Beaubrun
Yves Beaubrun
Krissy McKeon
Yolette Williams
Stephen Maxell
Gabrielle Alexis**

**Wanda Corominas
Gerson Corominas
Marie Alexandre
Mireille Victor
Francois Vaval
Kathryn Parker
Thomas Valburn
Alpha and Omega Mission
Detra Pasby
Magda Dominique
Delaware Haiti Development Group
Elding Dorlus
Kirk Greaves
Marc Rene
Marie Pierre-Louis
Paul Ferre
Natasha Cataline
Fritz Valdes
Joshua Guitierrez
Jackie Paranzino
Sandy Boswell
Roger Terma
The Mann Group, Inc.
Divine Alliance, Inc.
Bliss Travel Management
Marie Jean-Baptiste
Georgette Delisfort
Duckens Delisfort
Houston Delisfort
Kwesi Callendar
Edwige Benoit
Smart Investment Management Services, LLC (“SIMS”)
Fritz Nivose
Monia Emilcare**

3. Any and all documents relating in any way to the CCG Transfers, including but not limited to invoices, contracts, cancelled checks, financial accounting records, bank account records, and wire transfer records.

4. Any and all documents relating in any way to contracts or agreements entered into between yourself and any of the Receivership Entities, George Theodule, or any of the individuals and entities listed in Request No. 2 above, whether such agreements were written, oral or mutually understood by you and the contracting party.

5. Any and all documents relating in any way to the financial condition of any of the Receivership Entities.

6. Any and all documents relating in any way to the "Ponzi scheme" allegedly undertaken by George Theodule as described in Paragraphs 1 through 89 of the Amended Complaint.

7. Any and all documents evidencing, relating to or supporting the amount, type (monetary, goods, or services), and timing of all value, if any, provided by Defendants to any of the Receivership Entities in connection with the CCG Transfers.

8. Any and all documents evidencing, relating to or supporting any payments Defendants received from any of the Receivership Entities, or from George Theodule, or from any of the individuals and entities listed in Request No. 2 above, including, but not limited to, copies of checks (front and back), bank statements, wire transfer advices/instructions, invoices, bills of lading, and receipts.

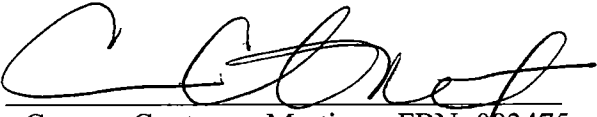
9. Any and all documents evidencing, relating to or supporting each of Defendants' denials of any and all of Plaintiff's allegations in the Amended Complaint.

10. Any and all documents evidencing, relating or supporting each affirmative defense that Defendants have asserted and/or intend to assert in Defendants' response to the Amended Complaint.

11. All documents that you provided to your lawyer pursuant to the Receiver's subpoena as you related in your deposition testimony of April 10, 2009 taken in the case of 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.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via e-mail, certified mail and U.S. Mail this 27th day of January, 2010 upon the parties listed on the attached service list as described.

By: 

Carmen Contreras-Martinez, FBN: 093475
ccontreras@gjb-law.com
GENOVESE JOBLOVE & BATTISTA, P.A.
Miami Tower, 44th Floor
100 Southeast Second Street
Miami, Florida 33131
Telephone: (305) 349-2300
Facsimile: (305) 349-2310
Attorneys for Receiver Jonathan E. Perlman, Esq.

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**

Wilmer Parker, Esq.
Maloy Jenkins Parker
75 14th Street, N.W., 25th Floor
Atlanta, GA 30309
Via e-mail: parker@mjplawyers.com
Attorney for Defendant Dorothy Delisfort

Donna Haver, Inc.
c/o Registered Agent George L. Theodule
c/o Russell C. Weigel, III, Esq.
Russell C. Weigel, III, P.A.
5775 Blue Lagoon Dr., Ste. 100
Miami, Florida 33126
Telephone: (786) 888-4567
Facsimile: (786) 787-0456
Via e-mail: rweigel@investmentattorneys.com
Attorneys for George L. Theodule

International Development Entrepreneurs
of America, Inc.
c/o Registered Agent George Theodule
c/o Russell C. Weigel, III, Esq.
Russell C. Weigel, III, P.A.
5775 Blue Lagoon Dr., Ste. 100
Miami, Florida 33126
Telephone: (786) 888-4567
Facsimile: (786) 787-0456
Via e-mail: rweigel@investmentattorneys.com
Attorneys for George L. Theodule

Complete Auto Repayment Solutions, Inc.
c/o Dorothy Delisfort
c/o Wilmer Parker, Esq.
Maloy Jenkins Parker
75 14th Street, N.W., 25th Floor
Atlanta, GA 30309
Via e-mail: parker@mjplawyers.com
Attorney for Defendant Dorothy Delisfort

Good Buy Homes, Inc.
c/o Registered Agent Yolette T. Williams
c/o Barry Michael Wax, Esq.
777 Brickell Avenue, Suite 1210
Miami, FL 33131
Telephone: (305) 373-4400
Facsimile: (305) 381-7135
Via e-mail: barrywax@bellsouth.net
Attorney for Yollette Williams

Via Certified Return Receipt Requested

Caribbean Airways, LLC
c/o Registered Agent Frantz Vilce
10474 Boynton Place Cir., #633
Boynton Beach, FL 33437

10061-008#24