

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)

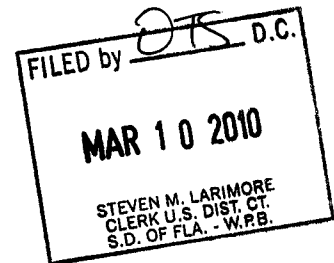
JONATHAN E. PERLMAN, Esq., as court  
Appointed Receiver of Creative Capital  
Consortium, LLC, et al.,

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.



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Defendant Dorothy Delisfort replies to the Order to Compel entered herein on March 4, 2010, as follows:

1.

Defendant did not receive the Plaintiff's request for production of these documents as indicated in Exhibit A.

2.

Defendant tendered all of the documents that were in her possession during the three depositions conducted by the plaintiff.

3.

Defendant has provided all records in her possession and control to the Receiver on the three occasions that she was deposed. Defendant has none of the other documents requested by the Plaintiff.

4.

As to the records of Wealth Builders, I had resigned from any activities of Wealth Builders Circle as of October 2008. Defendant was later informed that the company was evicted from its premises due to non-payment of rent. Defendant is unaware of what happened to the records left in that office.

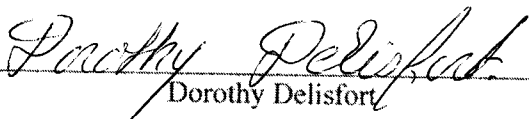
5.

Defendant informed and provided the above information to the Plaintiff at the aforementioned depositions.

Certificate of Service

I, certify that I mailed a copy of the foregoing defendant's reply for motion to compel to Plaintiff at:

Genovese, Joblove & Battista, P.A.  
Miami Tower, 44<sup>th</sup> Floor  
100 S.E. Second Street  
Miami, FL 33131  
On the 10<sup>th</sup> day of March 2010

  
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Dorothy Delisfort