

Defendant's Response to pre-trial stipulation

1.

The defendant "Delisfort" has no knowledge of the operations of the Florida defendants.

2.

Wealth Builders Circle was registered in January 10, 2008. Complete Auto Repayment Solutions, Inc. was registered on December 4, 2008. (This company was never operational)

3.

Wealth Builders Circle sent money collected from investors to Creative Capital Consortium for investment and in turn, Creative Capital Consortium would return funds to Wealth Builders Circle when investors requested withdrawals.

4.

Defendant Delisfort married Mr. George Theodule in September 2008, after a brief courtship.

5.

Moneys passing between Wealth Builders Circle and Creative Capital Consortium continued in the same pattern after the marriage.

6.

Defendant Delisfort received gifts for love and affection from George Theodule, but never conspired or aided and abetting George Theodule to defraud investors as alleged.

7.

In October 2008, defendant Delisfort demitted office with Wealth Builders Circle and in December 2008 learned that assets of Creative Capital Consortium were frozen.

8.

Defendant Delisfort has never knowingly received funds that belonged to investors

9.

Defendant Delisfort and Wealth Builders Circle have no assets which are derived from investors.