

CIVIL ACTION NO. 3:07-CV-0926-P

MICHAEL J. QUILLING, Receiver
for Megafund Corporation and Stanley A.
Leitner,

Plaintiff

V.

ALLAN CLARK, and
FINANCIAL RISK SPECIALIST,

Defendants

ORIGINAL ANSWER OF ALLAN CLARK

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, ALLAN CLARK, ("Defendant") and files this his Original Answer to Plaintiff's Original Complaint, and in support thereof would show unto this Honorable Court as follows:

Parties

- 1. Defendant is without knowledge or information sufficient to form a belief as to the truth of the averments in paragraph 1.
- 2. Defendant admits that he is an individual. Financial Risk Specialist is a Delaware corporation. Defendant admits the remainder of the allegations in paragraph 2.

Jurisdiction and Venue

- 3. Defendant admits the allegations of paragraph 3.
- 4. Defendant admits the allegations of paragraph 4.

5. Defendant admits the allegations of paragraph 5.

Background Facts

Filed 06/18/2007

- 6. Defendant is without knowledge or information sufficient to form a belief as to the truth of the averments in paragraph 6.
- 7. Defendant admits the allegations in the first sentence of paragraph 7. Defendant admits that the "Complaint alleged that the Defendants received fraudulent transfers totaling at least \$167,316.00" but denies that the allegation is true.
 - 8. Defendant admits the allegations in paragraph 8.
 - 9. Defendant admits the allegations in paragraph 9.
 - 10. Defendant admits the allegations in paragraph 10.
- Defendant admits the allegations in the first 4 sentences of paragraph 11. Defendant 11. is without knowledge or information sufficient to form a belief as to the truth of the averments in last sentence of paragraph 11.

COUNT ONE Breach of Contract

- 12. Defendant incorporates herein and realleges in full its answers to Paragraphs 1 through 11 of Plaintiff's Original Complaint.
- Defendant admits that Plaintiff purports to seek the relief requested in paragraph 13 13. but denies that it is entitled to the relief it seeks.

COUNT TWO Declaratory Judgment and Disgorgement

14. Defendant incorporates herein and realleges in full its answers to Paragraphs 1 through 13 of Plaintiff's Original Complaint.

15. Defendant admits that Plaintiff purports to seek the relief requested in paragraph 15 but denies that it is entitled to the relief it seeks.

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COUNT THREE Fees, Expenses, Costs and Interest

- 16. Defendant incorporates herein and realleges in full its answers to Paragraphs 1 through 15 of Plaintiff's Original Complaint.
- 17. Defendant admits that Plaintiff purports to seek the relief requested in paragraph 17 but denies that it is entitled to the relief it seeks.

WHEREFORE PREMISE CONSIDERED, Defendant respectfully prays that the Court grant judgment in his favor denying all claims asserted by Plaintiff, awarding costs and attorney's fees to Defendant, and awarding such other and further relief, both at law and in equity, to which he may show himself to be justly entitled.

Respectfully submitted,

VEON & ENGLAND, L.L.P.

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ATTORNEYS FOR ALLAN CLARK

CERTIFICATE OF SERVICE

This is to certify that a true and correct co	py of the abov	e and foregoing instrument	has this day been
This is to certify that a true and correct co served upon all counsel of record, via	Fax		_on this the 1841
day of $\sqrt{2007}$, as follows:			

Brent J. Rodine, Esq.

Quilling, Selander, Cummiskey & Lownds, P.C.

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Austin H/England