

Clare Louise Reading and  
James Leslie Reading, Appearing Pro Se  
2425 East Fox Street  
Mesa, Arizona 85213-5320  
480 964-0199

UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

UNITED STATES OF AMERICA,  
*Plaintiff*

2:11-cv-00698-FJM

v.

JAMES LESLIE READING, CLARE L.  
READING, FOX GROUP TRUST,  
MIDFIRST BANK, CHASE, FINANCIAL  
LEGAL SERVICES, STATE OF ARIZONA  
*Defendants*

ANSWER TO COMPLAINT  
and  
DEMAND FOR JURY TRIAL

**ANSWER TO COMPLAINT AND REQUEST FOR JURY TRIAL  
ON BEHALF OF JAMES L. READING AND CLARE L. READING**

NOW INTO COURT, appearing Pro Se, come JAMES LESLIE READING and CLARE  
L. READING, who in response to the complaint filed herein respectfully show:

1. The allegations of fact set forth in Paragraph 1 of the complaint require no response, but are, nonetheless, denied.
2. The allegations of fact set forth in Paragraph 2 of the complaint are admitted.
3. The allegations of fact set forth in Paragraph 3 of the complaint are admitted.
4. The allegations of fact set forth in Paragraph 4 of the complaint are admitted.
5. The allegations of fact set forth in Paragraph 5 of the complaint are denied.
6. The allegations of fact set forth in Paragraph 6 of the complaint are denied.

7. The allegations of fact set forth in Paragraph 7 of the complaint require no response, but are, nonetheless, denied.

8. The allegations of fact set forth in Paragraph 8 of the complaint require no response, but are, nonetheless, denied.

9. The allegations of fact set forth in Paragraph 9 of the complaint require no response, but are, nonetheless, denied.

10. The allegations of fact set forth in Paragraph 10 of the complaint require no response, but are, nonetheless, denied.

11. The allegations of fact set forth in Paragraph 11 of the complaint require no response, but are, nonetheless, denied.

12. The allegations of fact set forth in Paragraph 12 of the complaint are admitted.

13. The allegations of fact set forth in Paragraph 13 of the complaint are admitted.

14. The allegations of fact set forth in Paragraph 14 of the complaint are denied as written.

15. The allegations of fact set forth in Paragraph 15 of the complaint are denied.

16. The allegations of fact set forth in Paragraph 16 of the complaint are denied.

17. The allegations of fact set forth in Paragraph 17 of the complaint are denied.

18. The allegations of fact set forth in Paragraph 18 of the complaint are denied.

19. The allegations of fact set forth in Paragraph 19 of the complaint are denied.

20. The allegations of fact set forth in Paragraph 20 of the complaint are denied.

21. The allegations of fact set forth in Paragraph 21 of the complaint are denied.

22. The allegations of fact set forth in Paragraph 22 of the complaint are denied.

23. The allegations of fact set forth in Paragraph 23 of the complaint are denied.

24. The allegations of fact set forth in Paragraph 24 of the complaint are denied.
25. The allegations of fact set forth in Paragraph 25 of the complaint are denied.
26. The allegations of fact set forth in Paragraph 26 of the complaint are denied.
27. The allegations of fact set forth in Paragraph 27 of the complaint are denied.
28. The allegations of fact set forth in Paragraph 28 of the complaint are denied.
29. The allegations of fact set forth in Paragraph 29 of the complaint are denied.
30. The allegations of fact set forth in Paragraph 30 of the complaint are denied.
31. The allegations of fact set forth in Paragraph 31 of the complaint are denied.
32. The allegations of fact set forth in Paragraph 32 of the complaint are denied.
33. The allegations of fact set forth in Paragraph 33 of the complaint are denied.
34. The allegations of fact set forth in Paragraph 34 of the complaint are denied.
35. The responses to Paragraphs 1-34 hereinabove are reiterated by reference in response to Paragraph 35 of the complaint.
36. The allegations of fact set forth in Paragraph 36 of the complaint are denied.
37. The responses to Paragraphs 1-36 hereinabove are reiterated by reference in response to Paragraph 37 of the complaint.
38. The allegations of fact set forth in Paragraph 23 of the complaint are denied.
39. The responses to Paragraphs 1-38 hereinabove are reiterated by reference in response to Paragraph 39 of the complaint.
40. The allegations of fact set forth in Paragraph 40 of the complaint are denied.
41. The responses to Paragraphs 1-40 hereinabove are reiterated by reference in response to Paragraph 41 of the complaint.
42. The allegations of fact set forth in Paragraph 42 of the complaint are denied.

43. The responses to Paragraphs 1-42 hereinabove are reiterated by reference in response to Paragraph 43 of the complaint.

44. The allegations of fact set forth in Paragraph 44 of the complaint are denied.

45. The responses to Paragraphs 1-44 hereinabove are reiterated by reference in response to Paragraph 45 of the complaint.

46. The allegations of fact set forth in Paragraph 46 of the complaint are denied.

47. The allegations of fact set forth in Paragraph 47 of the complaint are denied as written.

48. The allegations of fact set forth in Paragraph 48 of the complaint are denied.

49. The allegations of fact set forth in Paragraph 49 of the complaint are denied.

50. The responses to Paragraphs 1-49 hereinabove are reiterated by reference in response to Paragraph 50 of the complaint.

51. The allegations of fact set forth in Paragraph 51 of the complaint are denied.

52. The allegations of fact set forth in Paragraph 52 of the complaint are denied.

53. The responses to Paragraphs 1-52 hereinabove are reiterated by reference in response to Paragraph 53 of the complaint.

54. The allegations of fact set forth in Paragraph 54 of the complaint are denied.

55. The allegations of fact set forth in Paragraph 55 of the complaint are denied for lack of knowledge or information to justify a belief therein.

56. The allegations of fact set forth in Paragraph 56 of the complaint are denied for lack of knowledge or information to justify a belief therein.

57. The allegations of fact set forth in Paragraph 57 of the complaint are denied for lack of knowledge or information to justify a belief therein.

58. The allegations of fact set forth in Paragraph 58 of the complaint are denied for lack of knowledge or information to justify a belief therein.

59. The allegations of fact set forth in Paragraph 59 of the complaint are denied for lack of knowledge or information to justify a belief therein.

60. The allegations of fact set forth in Paragraph 60 of the complaint are denied for lack of knowledge or information to justify a belief therein.

61. The allegations of fact set forth in Paragraph 61 of the complaint are denied for lack of knowledge or information to justify a belief therein.

62. The allegations of fact set forth in Paragraph 62 of the complaint are denied for lack of knowledge or information to justify a belief therein.

63. The allegations of fact set forth in Paragraph 63 of the complaint are denied for lack of knowledge or information to justify a belief therein.

64. The allegations of fact set forth in Paragraph 64 of the complaint are denied for lack of knowledge or information to justify a belief therein.

65. The allegations of fact set forth in Paragraph 65 of the complaint are denied for lack of knowledge or information to justify a belief therein.

66. The allegations of fact set forth in Paragraph 66 of the complaint are denied for lack of knowledge or information to justify a belief therein.

#### **Demand For Jury Trial**

67. Defendants demand trial by jury as to all issues and causes of action contended by the complaint proper to be so tried.

**Affirmative Defenses**

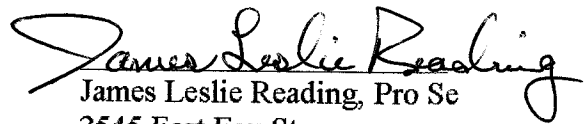
68. Defendants further show that the complainant's "Seventh Claim For Relief: To Set Aside A Fraudulent Conveyance" pursuant to the Arizona Uniform Fraudulent Transfer Act, A.R.S. 44-1001, et seq., is time barred by operation of A.R.S. 44-1009.


69. Defendants anticipate that discovery and investigation of complainants claims will disclose additional affirmative defenses and reserves the right to amend this answer to include the same as such defenses emerge.

WHEREFORE, defendants, JAMES LESLIE READING and CLARE LOUISE READING, pray that this answer be deemed good and sufficient response to the complaint filed herein and that after all due proceedings be had there be judgment herein in favor of Defendants, and against Complainant, rejecting all demands of Complainant, with prejudice and at Complainant's cost.

Defendants further pray for trial by jury as to all issues and causes of action contended by the complaint proper to be so tried.

Defendants further pray for all orders and decrees proper in the premises and for general and equitable relief.

  
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2545 East Fox St.  
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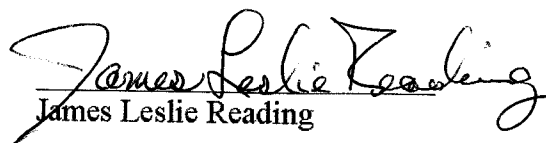
**CERTIFICATE OF SERVICE**

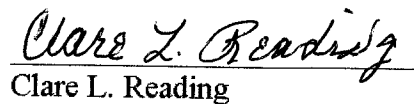
We, the undersigned, hereby certify that a copy of the foregoing Answer to Complaint and Demand For Jury Trial has this day been served upon the following counsel for Complainant, by posting the same with the United States Postal Service, properly addressed and with sufficient postage affixed thereto:

DENNIS K. BURKE, U.S. Attorney  
Two Renaissance Square  
40 North Central Ave. Suite 1200  
Phoenix, AZ 85004

CHARLES M. DUFFY  
U.S. Department of Justice, Tax Div.  
PO Box 683  
Ben Franklin Station  
Washington, DC 20044

Mesa, Arizona, this 6<sup>th</sup> day of June, 2011.

  
James Leslie Reading

  
Clare L. Reading