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Attorney for Defendant, Fox Group Trust

**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 FOX GROUP TRUST**

NOW INTO COURT, through undersigned counsel, comes FOX GROUP TRUST, hereinafter sometimes referred to as “FOX” or “The Trust”, named defendant herein, who in response to the complaint respectfully shows:

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 for lack of knowledge or information sufficient to justify a belief therein.
6. The allegations of fact set forth in Paragraph 6 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.
7. The allegations of fact set forth in Paragraph 7 are denied except that Fox shows that it is the owner of the real property in question.
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 for lack of knowledge or information sufficient to justify a belief therein.
16. The allegations of fact set forth in Paragraph 16 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

17. The allegations of fact set forth in Paragraph 17 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

18. The allegations of fact set forth in Paragraph 18 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

19. The allegations of fact set forth in Paragraph 19 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

20. The allegations of fact set forth in Paragraph 20 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

21. The allegations of fact set forth in Paragraph 21 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

22. The allegations of fact set forth in Paragraph 22 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

23. The allegations of fact set forth in Paragraph 23 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

24. The allegations of fact set forth in Paragraph 24 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

25. The allegations of fact set forth in Paragraph 25 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

26. The allegations of fact set forth in Paragraph 26 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

27. The allegations of fact set forth in Paragraph 27 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

28. The allegations of fact set forth in Paragraph 28 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

29. The allegations of fact set forth in Paragraph 29 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

30. The allegations of fact set forth in Paragraph 30 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

31. The allegations of fact set forth in Paragraph 31 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

32. The allegations of fact set forth in Paragraph 32 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

33. The allegations of fact set forth in Paragraph 33 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

34. The allegations of fact set forth in Paragraph 34 of the complaint are denied for lack of knowledge or information sufficient to justify a belief therein.

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 for lack of knowledge or information sufficient to justify a belief therein.

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 for lack of knowledge or information sufficient to justify a belief therein.

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 for lack of knowledge or information sufficient to justify a belief therein.

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 for lack of knowledge or information sufficient to justify a belief therein.

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 for lack of knowledge or information sufficient to justify a belief therein.

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. Defendant Fox Group Trust demands trial by jury as to all issues and causes of action contended by the complaint proper to be so tried.

Affirmative Defenses

68. Defendant Fox Group Trust further shows 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. Defendant Fox Group Trust anticipates that discovery and investigation of complainant's claims will disclose additional affirmative defenses and reserves the right to amend this answer to include the same as such defenses emerge.

WHEREFORE, defendant, FOX GROUP TRUST, prays 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.

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

Defendant further prays for all orders and decrees proper in the premises and for general and equitable relief.

/s/ Tommy K. Cryer
Tommy K. Cryer, La. Bar 4634
Atty for Defendant, Fox Group Trust
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318 797-8949
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CERTIFICATE OF SERVICE

I hereby certify that I have on this date electronically filed this motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel for the United States:

DENNIS K. BURKE, U.S. Attorney
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ROBERT P. VENTRELLA
Asst. Attorney General
1275 West Washington St.
Phoenix, AZ 85007

Shreveport, Louisiana, this 28th day of June, 2011.

/s/ Jimmy K. Cryer