

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA

JAMES A. KNAUER as the Court Appointed)
Receiver for HEARTLAND)
FINANACIAL SERVICES, INC., JMS)
INVESTMENT GROUP, LLC, ATLAS)
INCOME FUND, LLC BMC INVESTMENT) CASE NO: 1:03-CV-0279JDT-TAB
GROUP. LLC, DOLPHIN INTERNATIONAL)
DEVELOPMENT, LTD., BELIZE ESCROW)
SERVICES, HEARTLAND MONEY)
MANAGEMENT OF FLORIDA, INC.,)
LINCOLN FIDELITY ESCROW SERVICES,)
MDS INVESTMENT, INC., and 21ST)
CENTURY INTERNATIONAL ADVISORS,)
INC.)
)
Plaintiff,)
)
v.)
)
LESLIE REED,)
)
Defendant.)

DEFENDANT'S RESPONSE TO COMPLAINT

Comes now the Defendant, Leslie Reed, pro se and states the following in response to the Complaint filed against him in this matter:

**Count I
Complaint for Money Had and Received
(Implied Contract)**

3. The Defendant denies Count I, Paragraph #3.
4. The Defendant denies Count I, Paragraph #4.
5. The Defendant denies Count I, Paragraph #5.
6. The Defendant denies Count I, Paragraph #6.
7. The Defendant denies Count I, Paragraph #7.

THEREFORE, the Defendant requests for judgment not to be entered against the Defendant, Leslie Reed, and that the Complaint be dismissed.

**Count II
Unjust Enrichment**

8. The Defendant denies Paragraphs 3 through 7 incorporated into Count II from Count I above in the Complaint.
9. The Defendant denies Count II, Paragraph # 9.

THEREFORE, the Defendant requests for judgment not to be entered against the Defendant, Leslie Reed, and that the Complaint be dismissed.

Respectfully submitted,

By: 

Leslie Reed
Defendant
9924 Tudor Court
Fishers, Indiana 46038
(317) 570-8828

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above Response to Complaint has been served upon the Attorney of Record for the Plaintiff in this case addressed to: Samuel D. Hudson, KROGER, GARDIS & REGAS, LLP, 111 Monument Circle, Suite 900, Indianapolis, Indiana 46204-5125 by US Mail, First Class, Postage Pre-paid on this 26th day of March, 2003.


Leslie Reed
Defendant