

CAUSE NO. D-1-GV-10-000454

STATE OF TEXAS  
*Plaintiff*

IN THE DISTRICT COURT OF

v.

RETIREMENT VALUE LLC,  
RICHARD H. "DICK" GRAY,  
HILL COUNTRY FUNDING, LLC  
a Texas Limited Liability Company,  
IDLL COUNTRY FUNDING,  
a Nevada Limited Liability Company  
and, WENDY ROGERS  
*Defendants*

TRAVIS COUNTY, TEXAS

KEISLING, PORTER, KEISLING  
&FREE PC  
*Relief Defendant*

AND

JAMES SETTLEMENT SERVICES,LLC,  
RONALD L. JAMES, DONALD JAMES,  
MICHAEL BESTE, MILKIE/FERGUSON  
INVESTMENTS, INC., EDWARD  
MILKIE, DAN LEVIN, MANNY AIZEN,  
MARCO LOPEZ, GALLAGHER  
FINANCIAL GROUP, INC., W. NEIL  
("DOC") GALLAGHER, MICHAEL  
MCDERMOTT, SENIOR RETIREMENT  
PLANNERS, LLC, JAMES POE,  
FELLOWSHIP FINANCIAL LLC,  
MICHAEL EASTHAM, ESTATE  
PROTECTION PLANNING  
CORPORATION, SALVATORE  
MAGARACI, SECURED FINANCIAL  
STRATEGIES, LLC, REID H.  
THORBURN, BRIAN R. CERVENKA,  
NICHE INVESTMENT GROUP, LLC,  
EDMOND SANSING, DAMIEN  
PACHACEK, SHANE CORNETT,  
RAZOR FINANCIAL SERVICES, LLC,  
JAMES S. IKEY, BRIDY S. IKEY,  
SENIOR TEXAN ESTATE PLANNING

126th JUDICIAL DISTRICT

SERVICES, LLC, WILLIAM EVANS,	§
MIKE AHLERS, DARRILL S. BEEBE,	§
PC&S, LLC, GLOBAL ONE DIRECT,	§
LLC, DAVID A. SHIELDS, STEVEN	§
FEEKEN, JOSEPH T. DONNANTUONI,	§
FIRST COVENANT FINANCIAL	§
PARTNERS, LLC, PAUL BROST, DAVID	§
DOLPH, RONALD R. COLEMAN,	§
CHARLES DAVID GRAY, GARY	§
LENAHAM, EARL BROWN, MIOKE	§
GIVILANCZ, JR., KIP HARTMAN,	§
MICHAEL A. CASTELLANO, JOHN P.	§
FISH, JOEL FRANKLIN, W. JUSTIN	§
TITLE, DAVID RICE, JAMES WILLIAM	§
RASH, DAVID MATA, IAM FINANCIAL	§
SERVICES, INC., DAVID HERZOG, AND	§
SCOTT SCHROEDER, ELIZABETH	§
"LIZ" GRAY AND DAVID A. GRAY	§
<i>Third-Party Defendants</i>	§

**ORIGINAL ANSWER OF JAMES SETTLEMENT SERVICES, LLC, RONALD L. JAMES AND DONALD JAMES TO RECEIVER FOR HCF’s FIRST AMENDED CROSSCLAIMS AND ORIGINAL THIRD PARTY CLAIMS**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COME Third-Party Defendants, JAMES SETTLEMENT SERVICES, LLC (“JSS”), RONALD L. JAMES (“Ron James”), and DONALD JAMES (“Don James”) (jointly “Defendants”) and file this, their Original Answer to the HCF Receiver's First Amended Cross-Claims and Original Third-Party Claims, and allege and say as follows:

**GENERAL DENIAL**

Pursuant to Texas Rule of Civil Procedure 92, Defendants generally deny the allegations contained in the HCF Receiver's First Amended Cross-Claims and Original Third-Party Claims and demand strict proof thereof. Defendants reserve their right to amend this Answer as permitted by the Texas Rules of Civil Procedure, the agreements of the parties and the order of the Court.

WHEREFORE, Defendant prays for judgment of the Court as follows:

1. that Plaintiff takes nothing by his suit; and
2. that Defendants recover all costs and are awarded such other and further relief to which they may be entitled.

Respectfully submitted,

s/ \_\_\_\_\_  
Milton G. Hammond  
Texas Bar No. 08867720

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**ATTORNEY FOR THIRD- PARTY  
DEFENDANTS JAMES SETTLEMENT  
SERVICES, LLC, RONALD L. JAMES,  
AND DONALD JAMES**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above pleading has been served on November 11, 2011 on all parties of record via the Court's e-filing system or as indicated:

Richard Gray

*via e-mail*

s/ \_\_\_\_\_  
Milton G. Hammond