

J.D Pulver
11705 Boyette Rd., #437
Riverview, FL 33569
Telephone: (813) 677-6580

**BEFORE THE DIVISION OF SECURITIES
OF THE DEPARTMENT OF COMMERCE
OF THE STATE OF UTAH**

IN THE MATTER OF:	§	ANSWER TO EMERGENCY
	§	ORDER AND DEMAND FOR
J.D. PULVER	§	ORDER FOR PRE-HEARING
	§	DISCLOSURE OF DOCUMENTS
Respondent.	§	Docket No. SD-06-0058

Respondent J.D. PULVER, an individual, hereby answers the Emergency Order to Cease and Desist, and the Order to Show Cause dated August 21, 2006 in this case as follows:

1. Respondent admits in part and denies in part the allegations in ¶ 1 of the Emergency Order. Respondent was not associated with Flavor Brands, Inc., Flavor Brands I, Turkey Jerky, or any of its officers at the time of its incorporation and does not have sufficient information or beliefs to admit or deny these allegations of ¶ 1, and therefore denies them. Respondent admits that there was a dissolved Flavor Brands corporation in the state of Utah. Respondent does not have sufficient information that Flavor Brands was dissolved in June of 1999 for failure to file an annual report, and therefore denies it.

2. Respondent denies that Flavor Brands, Inc. was a Utah corporation in good standing. Respondent was informed that Flavor Brands, Inc. was administratively dissolved, however, an entity with the trading symbol FLVB was trading actively on the NASDAQ/OTC/PINK SHEETS Electronic market, therefore there was proven with Mr. Pulver's

due diligence that there was a complement of market makers allowing trades. Respondent is without sufficient information or belief to admit or deny the remaining allegations in ¶ 2 of the Order and therefore denies them.

3. Respondent Pulver admits in part and denies in part the allegations in ¶ 3 of the Order. Respondent admits that he is a resident of Florida with the address listed on the Order. Respondent denies that he is or ever was the president of Flavor Brands II.

4. Respondent Pulver admits in part and denies in part the allegations in ¶ 4 of the Order. Respondent admits that Tim Haskin is a resident of Nevada. Respondent admits Haskin was an officer of Flavor Brands, but is without sufficient information or belief to admit if he was an officer of Flavor Brands I or Flavor Brands II and therefore denies those allegations. Respondent is also without knowledge to admit or deny Tim Haskin's address and therefore denies these allegations.

5. Respondent Pulver admits in part and denies in part the allegations in ¶ 5 of the Order. Respondent admits that Denise Sullivan is the former president of Flavor Brands. Respondent Pulver is without sufficient information as to which Flavor Brands (I or II) Sullivan was president of and therefore denies these allegations. Respondent Pulver is without sufficient information to admit or deny what state Sullivan is a resident of or what her physical address is and therefore denies the allegations.

6. Respondent Pulver is without sufficient information or belief to admit or deny the allegations in ¶ 6 of the Order and therefore denies them.

7. Respondent Pulver is without sufficient information or belief to admit or deny the allegations in ¶ 7 of the Order and therefore denies them.

8. Respondent Pulver denies the allegations in ¶ 8 of the order. (Respondent Pulver never stated any intent regarding Flavor Brands I or II. Respondent Pulver was still doing due-diligence at that time to determine where mistakes were with the dissolved company and the trading entity.)

9. Respondent Pulver denies that he was aware that Flavor Brands II adopted a resolution approving the issuance of a combined total of forty million shares of its common stock. Respondent Pulver further denies he approved any resolutions adopted by Flavor Brands II and restates that he was never an officer of the company.

10. Respondent Pulver admits in part and denies in part the allegations in ¶ 10 of the Order. Respondent admits there was an old announcement in Pink Sheets regarding the swapping of old Flavor Brands stock for new Flavor Brands stock. This announcement was posted in Pink Sheets before Pulver was introduced to the Parties. Respondent Pulver is without sufficient information as to when this announcement was made and therefore denies these allegations. Respondent Pulver further denies that he was involved in any way with the making of this announcement on Pink Sheets. Respondent Pulver was without sufficient information or belief as to whether it was specifically Flavor Brands I stock and not Flavor Brands II stock that traded under the symbol FLVB on the Pink Sheets and therefore denies these allegations.

11. Respondent Pulver is without sufficient information to admit or deny the allegations in ¶ 11 of the Order and therefore denies them. (American Registrar did not file the correct paperwork to have the dissolved company stop trading shares which is why the two companies were seen as one that was re-incorporated?)

12. Respondent Pulver is without sufficient information or belief to admit or deny the allegations in ¶ 12 of the Order and therefore denies them. (Flavor Brands II was presented to Pulver as the successor of Flavor Brands I, so Respondent Pulver is actually a victim in this matter. This new entity was given the same name as the dissolved corporation formed with Denise Sullivan. Pulver never understood why the same name was given to the so-called “new” corporation.)

13. Respondent Pulver admits the allegations in ¶ 13 of the Order. Respondent further states that he had already ceased any involvement with Flavor Brands I or Flavor Brands II before the Division sent out the letter dated July 10, 2006.

14. Respondent Pulver denies the allegations in ¶ 14 of the Order. (Pulver was not an officer of the company and therefore could not dissolve the company; he informed Mr. Buckner, Assistant Attorney General, this same information in a telephone conversation).

15. Respondent Pulver is without sufficient information or belief to admit or deny the allegations in ¶ 15 of the Order and therefore denies them.

16. Respondent Pulver denies that he made any representations in the Pink Sheets and therefore denies the allegations in ¶ 16 of the Order. (Respondent further states:

- a. Pulver was told by his Utah attorney, Jim Barber, that the affairs of the dissolved corporation could be caught-up and that the company could get a declaratory judgment to do so, under code 16-10A-1405.
- b. Joe Arcaro and Charles Langrill were listed as officers.
- c. The offer represented on Pink Sheets was an old listing from Joseph Arcaro and/or Charles Langrill, not Pulver or Haskin.)

17. Respondent Pulver is without sufficient information or belief to admit or deny the allegations in ¶ 17 or the Order and therefore denies them. (Pulver never signed any resolutions to approve any stock issuance, sale or swap ever).

18. Respondent Pulver admits in part and denies in part the allegations in ¶ 18 of the Order. Respondent admits that he is not licensed to sell securities. Respondent Pulver further states that he has never offered to sell securities. Respondent Pulver is without sufficient information to admit or deny that Haskin is not licensed to sell securities and therefore denies these allegations.

19. Respondent Pulver denies that he violated the Utah Uniform Securities Act. (see ¶s 8 – 18 of the answer.)

20. Respondent Pulver again denies that he offered to sell shares of stock as alleged in ¶ 20 of the Order. (Pulver also asks for proof of these allegations that he ever offered to sell securities.)

21. Respondent Pulver denies the allegations in ¶ 21 of the Order.

22. Respondent Pulver denies the allegations in ¶ 22 of the Order.

23. Respondent Pulver denies the allegations in ¶ 23 of the Order. (Pulver again asks for proof of this alleged violation.)

24. Respondent Pulver denies the allegations in ¶ 24 of the Order. (Respondent has no knowledge of any investor or shareholder of the trading entity ever being contacted.)

25. Respondent Pulver denies he made any of the representations alleged in ¶ 25 of the Order. Respondent Pulver again re-states that he was never an Officer of Flavor Brands I or Flavor Brands II.

(a. A Utah attorney informed the respondents it could be done. Pulver also re-states information from his previous letter to the Division that he was represented from Sullivan and Haskin that they had a shell corporation that was looking for a merger candidate and that is what part Pulver was to play in this situation. Pulver was in the process of doing normal due-diligence to determine the proper control parties to facilitate a deal.

b. Any shareholder could see FLVB stock was trading on the OTC Electronic.

c. Respondent Pulver denies these allegations.

d. Respondent Pulver denies these allegations.)

26. Respondent Pulver denies the allegations of ¶ 26 of the Order for the same reason as stated in ¶ 25 of the Answer (and hereby requests proof that any securities were ever issued, offered, or sold by Pulver).

27. Respondent Pulver denies he was involved in the allegations of ¶ 27 of the Order. Respondent further states that Tim Haskin and Pulver were deceived and victimized by those allegations as they were presented to them by Langrill/Sullivan. (Respondent Pulver never contacted any investors or shareholders about the company or its future.)

28. Respondent Pulver denies the allegations in ¶ 28 of the Order. (Joseph Arcaro or Charles Langrill may have offered securities to investors, but Pulver is without knowledge of this.)

29. Respondent Pulver denies the allegations in ¶ 29 of the Order and further states that he had no control over any stock that was listed in Pink Sheets. (Pulver offered to help get the stock delisted but only as a consultant.)

30. Respondent Pulver denies the allegations in ¶ 30 of the Order.

GENERAL DENIAL

Respondent Pulver denies each and every allegation in the Emergency Order to Cease and Desist and the Order to show cause that he has not specifically and expressly admitted and further states:

- a. Respondent Pulver should not be found to have engaged in the violations alleged by the Division in the Emergency Order to Cease and Desist and the Order to Show Cause.
- b. The Cease and Desist Order is not necessary as Respondent Pulver did not engage in any of those violations that were listed in the Emergency Order.
- c. Respondent Pulver should not be ordered to pay a fine of up to \$50,000.

FIRST DEFENSE

1. Respondent Pulver never issued any stock with Flavor Brands, nor did he ever offer any sales or swaps. The Utah Division of Securities has not, nor would not be able to show just cause for this outrageous misappropriation of facts. Respondent Pulver never contacted anyone in public and therefore could not have caused any immediate harm or damage.

SECOND DEFENSE

2. If the transfer agent for Flavor Brands I would have cancelled the trading stock (FLVB), this Flavor Brands II never would have been misconstrued as the "new" or "successor" company to Flavor Brands I. (Respondent Pulver purchased shares of FLVB out of the free-

trading OTC Electronic-market, as Proof/Test that it could be bought and their was a market and that the entity was at this time valid. (This was part of doing Due-Diligence).

THIRD DEFENSE

3. Respondent Pulver was never an officer of Flavor Brands II. Neither the Utah Secretary of State or NASDAQ governing bodies suggest that. He was asked by the persons who represented Flavor Brands II to him to find a merger candidate or acquisition for their company on a consultant basis.

FOURTH DEFENSE

4. This administrative proceeding, in which the proceeding officers have also accused the respondents, denies the constitutional rights of the respondents to a fair proceeding. The Division has also violated the separation of the powers and constitutes a denial of due process as well as equal protection of the law.

FIFTH DEFENSE

5. The Order to Show Cause is facially defective, in that it fails to plead "fraud" with the specificity required by the Utah Rules of Civil Procedure [Rule 9 (b), U.R. Civ. P: "fraud" actions to be stated "with Particularity"] and by the Administrative Procedures statue, in that the pleading fails to identify "the victims" and Respondent should not have to respond to an "anonymous victims" claim.

ADDITIONAL DEFENSES RESERVED

Respondent Pulver reserves the right to assert such additional defenses as are ascertained through the pre-hearing "disclosure" mandated pursuant to Section 63-46b-5(1) (f), Utah Code.

SUMMATION

Respondent Pulver can prove that he has never solicited residents or any public party for any reason and acts himself as a safeguard to prevent clients from being introduced to fraudulent or unscrupulous persons and that he in fact was just doing due diligence with regards to Flavor Brands. Pulver cannot be responsible for the acts of Arcaro, Langrill, and Sullivan or any other officers or agents of said company. In fact, Pulver had been told by Haskin, that Arcaro and or Langrill did sell shares of said company stock but never produced-it for the buyer, but again, any of the transactions would come to surface if the State of Utah Securities Division had investigated the facts, and anything like that was far before Mr. Pulver's introduction to the company or the parties. Mr. Pulver feels very slandered and defied in character for someone who has a record of integrity and always one to be in compliance for eight years consulting.

DEMAND FOR HEARING

Respondent Pulver demands an adjudicative hearing before an impartial tribunal and/or mediation by nonpartisan parties.

DEMAND FOR PRE-HEARING DISCLOSURE OF RECORDS

Respondent Pulver requests that the Division be ordered to disclose all records and other evidence regarding the Divisions accusations in this matter to the Respondent.

WHEREFORE, Respondent Pulver demands that:

1. The Emergency Order to Cease and Desist and the Order to Show Cause be
dismissed with prejudice;

2. Respondent Pulver should be awarded a judgment in his favor for his reasonable costs and attorneys' fees incurred in his defense, including an award of attorneys' fees pursuant to the Small Business Equal Access to Justice Act, Section 78-27a-1 et seq, Utah Code; and
3. Such other relief as is just be granted considering Respondent has been slandered and defamed maliciously by the Division

Alternatively, but without waiving any rights, Respondent Pulver demands:

4. An adjudicative hearing before an impartial tribunal; and
5. That the Division be ordered to disclose all records and other evidence regarding the Divisions accusations in this matter to the Respondent.

Dated this 16th day of October, 2006.



J.D. Pulver
Respondent

CERTIFICATE OF SERVICE

The undersigned certifies that on the 16th day of October, 2007 copies of the foregoing Amended Motion to Set Aside Default Judgment, Answer, Demand for Order for Disclosure for Pre-Hearing Disclosure of Documents, and evidence labeled "A" through "F" was served on the parties as follows:

Via FedEx and Faxed

Wayne Klein
Presiding Officer, Division of Securities
Utah Department of Commerce
P.O. Box 146760

Salt Lake City, UT 84114-6760
FAX: (801) 530-6980

Jeff Buckner
Assistant Attorney General
Utah Attorney General's Office
P.O. Box 140872
Salt Lake City, UT 84114-0872
FAX: (801) 366-0315

VIA U.S. Mail

Benjamin Johnson
Division of Securities
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111

JD Pulver

From: TimHaskin@aol.com
Sent: Monday, March 06, 2006 5:22 PM
To: jd@tampabay.rr.com
Subject: Re: reminder also FL and AC

State of Incorporation: Utah

Authorized Common.

Authorized Preferred A or B:

Issued Preferred:

Delivery % upon closing:

Assets Hard Assets None

Liabilities None other than any possible back filing fees and/or Transfer agent fees

Litigation. None that we know of

Shareholders. Share holder lists I will check on, The Transfer Agent will have the list.
American Registrar & Transfer Co., Salt Lake City, UT 84111

Restricted Stock and it's age. how many parties hold etc..

Any notes or comments on reverse restrictions, Voting powers, notes, etc....

Pink Sheets info, please note Joseph Arcaro and Charles Langrill names appear on Pink Sheets But ARE NOT LISTED WITH THE STATE OF UTAH.

FLVB -- Flavor Brands, Inc.
Com (\$0.001)

Search for Dun & Bradstreet reports on this company.

Address:
9050 W Warm Springs Rd.
#1136
Las Vegas, NV 89148
USA

Phone: 702-795-0934
Fax: 702-795-0934

Business Description:

In May of 2005, articles of Inc for Flavor Brands, Inc. were filed w/ the dept. of commerce, state of Utah. The new incorporator of Flavor Brands, Inc. will seek a stock swap of old Flavor Brands stock for newly issued stock.

State of Incorporation: UT

Officers:

Denise Sullivan, Pres. & CEO; Joseph Arcaro, VP; Charles Langrill, Sec't. & Treas.

Outstanding Shares: Not Available

Estimated Market Cap: Not Available

Evidence
1st

*Pulver's introduction
to the
company -
clearly states that
it is the old
Flavor Brands - ie - incorporated*

Current Capital Change:

shs decreased by 1 for 100 split.

Ex-Date: 1995-10-17

Record Date: 1995-10-17

Pay Date: 1995-10-17

Dividends:

Company Notes:

Formerly=Turkey Jerky, Inc. to 10-91

Class Notes:

New Issue=1-85 15,000,000 shs at \$0.03 (best efforts-11,000,000 min.) by Dillon Securities

Transfer Agent:

American Registrar & Transfer Co., Salt Lake City, UT 84111

2006 FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# 674774

FILED
Jan 10, 2006
Secretary of State

Entity Name: ABC DISPENSING TECHNOLOGIES, INC.

Current Principal Place of Business:

9050 W. WARM SPRINGS, #1136
LAS VEGAS, NV 89148

New Principal Place of Business:

9101 W. SAHARA AVE.
#105-250
LAS VEGAS, NV 89117 US

Current Mailing Address:

9050 W. WARM SPRINGS, #1136
LAS VEGAS, NV 89148

New Mailing Address:

9101 W. SAHARA AVE.
#105-250
LAS VEGAS, NV 89117 US

FEI Number: 59-2001203 FEI Number Applied For () FEI Number Not Applicable () Certificate of Status Desired (X)

Name and Address of Current Registered Agent:

SULLIVAN, MICHAEL
430 S.E. 3RD PLACE
DEERFIELD BEACH, FL 33441 US

Name and Address of New Registered Agent:

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Election Campaign Financing Trust Fund Contribution ().

OFFICERS AND DIRECTORS:

Title: PD () Delete
Name: SULLIVAN, DENISE
Address: 9050 W. WARM SPRINGS, #1136
City-St-Zip: LAS VEGAS, NV 89148

Title: VD () Delete
Name: HAYS, LEN
Address: 7345 S. DURANGO
City-St-Zip: LAS VEGAS, NV 89148

Title: SD () Delete
Name: HASKIN, TIM
Address: 924 DEMOT
City-St-Zip: LAS VEGAS, NV 89119

ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: VD (X) Change () Addition
Name: ARCARO, JOSEPH A
Address: 1901 W. SAHARA AVE. STE. #105-250
City-St-Zip: LAS VEGAS, NV 89117

Title: SD (X) Change () Addition
Name: LANGRILL, CHARLES
Address: 1901 W. SAHARA AVE. STE.#105-250
City-St-Zip: LAS VEGAS, NV 89117

Shows these people have worked together on other companies.

Pulver is not a part of their group.

I hereby certify that the information supplied with this Florida Statutes. I further certify that the information my electronic signature shall have the same legal effect as the receiver or trustee empowered to execute this report above, or on an attachment with an address, with a

as required in Chapter 119, and accurate and that the name of the corporation or trust and that my name appears

SIGNATURE: JOSEPH ARCARO

Electronic Signature of Signing Officer or Director

01/10/2006

Date

Evidence B



Utah Department of Commerce
Division of Corporations & Commercial Code

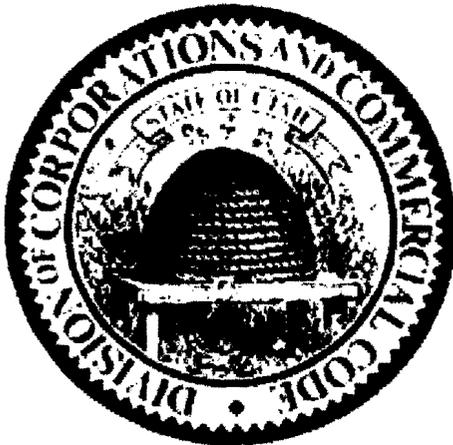
160 East 300 South, 2nd Floor, PO Box 146705
Salt Lake City, UT 84114-6705
Service Center: (801) 530-4849
Toll Free: (877) 526-3994 Utah Residents
Fax: (801) 530-6438
Web Site: <http://www.commerce.utah.gov>

03/17/2006
5918144-014203172006-456060

CERTIFICATE OF EXISTENCE

Registration Number: 5918144-0142
Business Name: FLAVOR BRANDS, INC
Registered Date: May 24, 2005
Entity Type: Corporation
Current Status: Good Standing

The Division of Corporations and Commercial Code of the State of Utah, custodian of the records of business registrations, certifies that the business entity on this certificate is authorized to transact business and was duly registered under the laws of the State of Utah. The Division also certifies that this entity has paid all fees and penalties owed to this state; its most recent annual report has been filed by the Division; and, that Articles of Dissolution have not been filed.



Kathy Berg

Kathy Berg
Director
Division of Corporations and Commercial Code

*PULLER TRIED TO GET
ID #S & FEIN'S
FROM TA, TO SORT-IT-OUT
THEY WOULDN'T HAVE*

*IT.
THIS (COE) IS MAYOS*

*Evidence
C*



Online Services

Agency List

Business

Search



Utah Department of Commerce

Business Entity Search

Business Entity Search - Principals

Name	Type	City	Status
FLAVOR BRANDS, INC	Corporation	Las Vegas	Expired

Function	Name	Address	
Director	CHARLES E LANGRILL	9050 W WARM SPRINGS RD #1136	Las Vegas NV 89148
Director	JOE ARCARO	9101 W SAHARA AVE #105-250	Las Vegas NV 89117
President	JOSEPH ARCARO	9101 W SAHARA AVE #105-250	Las Vegas NV 89117
Registered Agent	PRINCIPAL OFFICE(FOR SERVICE OF PROCESS)	9101 W SAHARA AVE STE 105-250	Las Vegas NV 89117
Secretary	JOE ARCARO	9101 W SAHARA AVE #105-250	Las Vegas NV 89117
Treasurer	JOE ARCARO	9101 W SAHARA AVE #105-250	Las Vegas NV 89117
Vice President	CHARLES LANGRILL	9101 W SAHARA AVE #105-250	Las Vegas NV 89117

Additional Principals on file at Division of Corporations: N

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Current list
of Officers for
Flavorbrands

Pulver never was
an officer!

HASKIN IS NOT EVEN LISTED
AS AN OFFICER.

Evidence
F

FOREX

THE FOREX MARKET



Trade Anytime
Pay No Commissions

Control Up
200:1 Leverage

Home >> [Quotes & News](#) >> [Company Information](#) >> ABCI

[QUOTE](#)
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[CHARTS](#)
[COMPANY INFO](#)
[FINANCIAL REPORT](#)

ABCI -- ABC Dispensing Technologies, Inc.
Com (1) Cert (New)

Address:
7145 S. Durango Dr.
#B-107-242
Las Vegas, NV 89148
USA

Website: <http://www.abcdispensing.com>
Phone: 800-349-5894

Business Description:

The company is a newly organized development stage company primarily engaged in food and beverage. ABC Dispensing will focus on the bottling of its natural mountain spring water "au Le Cadeau" which is laden with a very high mineral content including colloidal gold. The water will be packaged in a high end glass container resembling the Eiffel Tower. Other products are in development.

State of Incorporation: FL
Year of Incorporation: 1980

Officers:
Denise Sullivan, Pres.; Tim Haskin, Sec'y. & Treasurer; Len Hays, Vice Pres.

Edgar Filing Status: Non-Current EDGAR Filer

Outstanding Shares: 849,310 as of 2005-12-09

Estimated Market Cap: 433,148 as of 2005-11-29 (based on Outstanding Shares as of 2005-12-09)
Authorized Shares: 150,000,000 as of 2005-08-01
Float: 23,270 as of 2005-09-20

Current Capital Change:
shs decreased by 1 for 1000 split
Ex-Date:
Record Date:
Pay Date: 2005-09-21

Dividends:

Company Notes:
Formerly American Business Computers Corp. until 5-96
Note-8-1-05 company is in the development stage

Class Notes:
New Issue-9-84 2,000,000 shs in units (2 shs Com & 1 Warr 9-12-87) at \$2 per unit (best efforts - 667,000 min.) by Creative Securities Corp.

Transfer Agent:
American Stock Transfer & Trust Company, New York, NY 10038

*Shows the same
people that
presented other shells
to me I did not
fund them - or solicit
them.*

sheets

Evidence
D