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Attorney for Respondents

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

In the Matter of: GLOBIE INTERNATIONAL, LLC; JOSEPH PAUL OTTIS Respondents	ANSWER Case Nos.: SD-07-0038 SD-07-0039

Respondents Globie International, LLC and Joseph Paul Ottis (hereinafter collectively "Respondents" or individually "Globie International" or "Mr. Ottis"), by and through their counsel of record, Christian W. Clinger of the law firm of Clinger Lee Clinger, LLC, file this Answer to the Order to Show Cause and admits, denies, and alleges as follows:

FIRST AFFIRMATIVE DEFENSE

Petitioner fails to specifically state a claim with sufficient support and or evidence upon which relief can be granted and should be dismissed pursuant to Rule 12(b)(6) of the Utah Rules of Civil Procedure.

SECOND AFFIRMATIVE DEFENSE

Petitioner lacks jurisdiction of the subject matter as well as over the Respondents, collectively or individually, and therefore the Order to Show Cause should be dismissed.

Globie International and Mr. Ottis deny that any security was offered under the allegation as set forth in the Division's Order to Show Cause.

If any security was offered to D.L., the security could potentially be two Promissory Notes dated April 28, 2005 by and between D.L. and **Globie Investments Enterprises, Inc.**, a separate and distinct corporation from Respondent Globie International, LLC. True and accurate copies of the two Promissory Notes dated April 28, 2005 are attached hereto and incorporated by reference.

The Utah Division of Securities lacks jurisdiction over the subject matter as well as over the Respondents because D.L. and **Globie Investments Enterprises, Inc.** mutually contracted that each Promissory Note, "**shall** be construed according to and governed by the law of the State of Nebraska." Neither Respondent Globie International nor Respondent Mr. Ottis were personally liable for either Promissory Note. Furthermore, the plain language of each Promissory Note governs the terms, conditions, and obligations of the parties thereto. For the reasons set forth above, the Utah Division of Securities lacks jurisdiction over the subject matter as well as over the Respondents, and therefore, this Order to Show Cause must be dismissed.

ANSWER

Answering the enumerated paragraphs of the Order to Show Cause, Respondents admit, deny, and allege as follows:

1. In response to paragraph 1, Respondents deny all of the allegations therein.

2. In response to the first sentence of paragraph 2, Respondent Globie International lacks sufficient information as to the specific allegations set forth therein and therefore denies, however, Respondent Globie International does not dispute that the limited liability company has been statutorily dissolved because it did not refile with the State of Utah Department of Commerce.

In response to the second sentence of paragraph 2, Respondent Mr. Ottis admits the allegations therein.

3. In response to paragraph 3, Respondent Mr. Ottis admits in part and denies in part the allegations therein. Mr. Ottis moved back to Omaha, Nebraska in April 2005, and he has been a resident thereof since that time.

4. In response to paragraph 4, Respondent Mr. Ottis denies all of the allegations therein.

5. In response to paragraph 5, Respondent Mr. Ottis denies all of the allegations therein.

6. In response to paragraph 6, Respondent Mr. Ottis denies all of the allegations therein.

7. In response to the first sentence of paragraph 7, Respondent Mr. Ottis admits the allegations therein. In response to the second sentence of paragraph 7, Respondent Mr. Ottis is without sufficient knowledge or information as to the allegations, and thus he denies all of the allegations therein.

8. In response to paragraph 8, Respondent Mr. Ottis denies all of the allegations therein.

9. In response to paragraph 9, Respondent Mr. Ottis denies all of the allegations therein.

10. In response to paragraph 10, both Respondents are without sufficient knowledge or information, and therefore deny all of the allegations therein.

11. In response to paragraph 11, Respondent Mr. Ottis lacks sufficient knowledge or information as to his numerous conversations with D.L. and as to the allegations set forth, and thus, he denies the allegations therein.

12. In response to paragraph 12, Respondent Mr. Ottis lacks sufficient knowledge or information as to the allegations set forth, and thus, he denies the allegations therein.

13. In response to paragraph 13, Respondent Mr. Ottis denies all of the allegations therein.

14. In response to paragraph 14, Respondent Mr. Ottis lacks sufficient knowledge or information as to the allegations set forth, and thus, he denies the allegations therein.

15. In response to paragraph 15, Respondents both lack sufficient knowledge or information as to the allegations set forth, and thus, they deny the allegations therein.

16. In response to paragraph 16, Respondent Mr. Ottis denies all of the allegations therein.

17. In response to paragraph 17, Respondents both lack sufficient knowledge or information as to the allegations set forth, and thus, they deny the allegations therein.

18. In response to paragraph 18, Respondents both lack sufficient knowledge or information as to the allegations set forth, and thus, they deny the allegations therein.

19. In response to paragraph 19, Respondent Mr. Ottis denies all of the allegations therein.

20. In response to paragraph 20, Respondent Mr. Ottis denies all of the allegations therein.

21. In response to paragraph 21, Respondents both lack sufficient knowledge or information as to the allegations set forth, and thus, they deny the allegations therein.

22. In response to paragraph 22, Respondents both lack sufficient knowledge or information as to the allegations set forth, and thus, they deny the allegations therein.

23. In response to paragraph 23, Respondents both lack sufficient knowledge or information as to the allegations set forth, and thus, they deny the allegations therein.

24. In response to paragraph 24, Respondents both lack sufficient knowledge or information as to the allegations set forth, and thus, they deny the allegations therein.

25. In response to paragraph 25, Respondents both lack sufficient knowledge or information as to the allegations set forth, and thus, they deny the allegations therein.

26. In response to paragraph 26, Respondent Mr. Ottis denies all of the allegations therein.

27. In response to paragraph 27, Respondent Mr. Ottis lacks sufficient knowledge or information as to the allegations set forth, and thus, he denies the allegations therein.

28. In response to paragraph 28, Respondent Mr. Ottis lacks sufficient knowledge or information as to the allegations set forth, and thus, he denies the allegations therein.

29. In response to paragraph 29, Respondent Mr. Ottis denies all of the allegations therein.

30. In response to paragraph 30, Respondent Mr. Ottis denies all of the allegations therein.

31. In response to paragraph 31, Respondents both lack sufficient knowledge or information as to the allegations set forth, and thus, they deny the allegations therein.

32. In response to paragraph 32, Respondents both lack sufficient knowledge or information as to the allegations set forth, and thus, they deny the allegations therein.

33. In response to paragraph 33, Respondent Mr. Ottis admits the first sentence only, but he denies all remaining allegations therein.

34. In response to paragraph 34, Respondents are without sufficient information or knowledge as to the specifics between D.L. and her son-in-law and therefore, Respondents deny all of the allegations therein.

35. In response to paragraph 35, Respondent Mr. Ottis denies all of the allegations therein.

36. In response to paragraph 36, Respondents admit all of the allegations therein.

37. In response to paragraph 37, Respondent Mr. Ottis denies all of the allegations therein.

38. In response to paragraph 38, Respondent Mr. Ottis denies all of the allegations therein.

39. In response to paragraph 39, Respondent Mr. Ottis admits that Globie Investments Enterprises, Inc. could pay D.L. if she stopped hindering its efforts. All other allegations therein are denied.

40. In response to paragraph 40, Respondents deny the allegations therein.

41. In response to paragraph 41, Respondents deny all of the allegations therein in as much as the Promissory Note dated April 28, 2005 maturing on June 15, 2006 speaks for itself.

42. In response to paragraph 42, Respondents deny all of the allegations therein in as much as the Promissory Note dated April 28, 2005 maturing on May 15, 2006 speaks for itself.

43. In response to paragraph 43, Respondents deny all of the allegations therein in as much as D.L. has had several communications with Respondent Mr. Ottis from June 2006 to June 2007 as well as the Nebraska Attorney that represents Mr. Ottis and Globie Investments Enterprises, Inc. and associates of Mr. Ottis and Globie Investments Enterprises, Inc. D.L. has known where Respondent Mr. Ottis has been including his telephone number and address in Omaha, Nebraska. Additionally, Respondent Mr. Ottis is listed in the telephone directory with his home telephone number and address in Omaha, Nebraska. D.L. contacted Mr. Ottis shortly after a newspaper article ran in the Salt Lake Tribune regarding this matter.

44. In response to paragraph 44, Respondents deny all of the allegations therein.

45. In response to paragraph 45, Respondents deny all of the allegations therein unless specifically stated or admitted otherwise.

46. In response to paragraph 46, Respondents are without sufficient knowledge or information to make a legal conclusion as to the allegations therein, and therefore deny all of the allegations therein.

47. In response to paragraph 47 and its subparts, Respondents deny all of the allegations therein.

48. In response to paragraph 48 and its subparts, Respondents deny all of the allegations therein.

49. In response to paragraph 49, Respondents deny all of the allegations therein.

50. In response to paragraph 50, Respondents deny all of the allegations therein unless specifically stated or admitted otherwise.

51. In response to paragraph 51 and its subparts, Respondents deny all of the allegations therein.

52. In response to paragraph 52, Respondents deny all of the allegations therein.

53. Respondents collectively and individually deny each and every paragraph of the Order to Show Cause not expressly admitted above.

THIRD AFFIRMATIVE DEFENSE

D.L. claims against Respondents are barred in whole or in part by the doctrines of estoppel, laches, unclean hands, and/or waiver.

FOURTH AFFIRMATIVE DEFENSE

D.L. has failed to mitigate her alleged damages.

FIFTH AFFIRMATIVE DEFENSE

D.L. has failed to disclose to the Division of Securities that she and Respondent Mr. Ottis were involved in a dating relationship. This relationship ended when D.L. was in California where Respondent Mr. Ottis suspected and was informed by members of the Scientology Center that D.L. suffered from a psychiatric mental condition and was using psychotropic medications. D.L. had grandiose and delusional thoughts which caused uncontrollable behavior as evidence by

the Scientology Celebrity Center in California. Members of the Scientology Center were prepared to call 911, but they were able to get D.L. under control. The Scientology Center asked Respondent Mr. Ottis to keep D.L. away from the Center. It was recommended that Respondent Mr. Ottis take D.L. home. Respondent Mr. Ottis had to end the business trip early to get D.L. to the airport and send her home.

SIXTH AFFIRMATIVE DEFENSE

The alleged conduct of Respondents was not or is not the cause and fact and/or the proximate cause of the alleged loss alleged.

SEVENTH AFFIRMATIVE DEFENSE

Respondents' alleged conduct does not rise to the level of intentional, willful, or wanton acts.

EIGHTH AFFIRMATIVE DEFENSE
AND REQUEST FOR ATTORNEYS' FEES AND COSTS

The Order to Show Cause incorrectly identifies Globie International, LLC and the Order to Show Cause, along with newspaper comments made by Division Director Wayne Klein are filed in bad faith and constitutes malicious abuse of process, whereby, Respondents are entitled to an award and recovery of its attorneys' fees and costs pursuant to the U.C.A. 78-27-56, and U.C.A. 78-27-56.5.

RESERVATION OF ADDITIONAL DEFENSES

The claims are barred in whole or in part by other legal doctrines or mattes which constitute avoidance or affirmative defenses that may be ascertained during these proceedings and Respondents reserve the right to assert such defenses as discovery proceeds in this action.

PRAYER FOR RELIEF

WHEREFORE, Respondents, collectively and individually, prays for relief as follows:

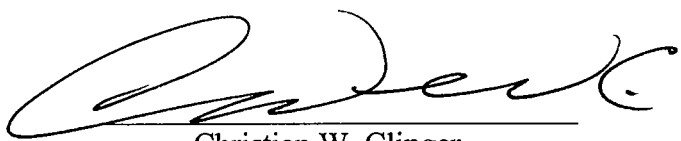
1. that, the Order to Show Cause be dismissed for failure to state a claim upon which relief can be granted pursuant to Rule 12(b)(6) of the Utah Rules of Civil Procedure; and,

2. that, the Order to Show Cause be dismissed for lack of jurisdiction over the parties and subject matter; and,

3. that, an Order be entered denying the Order to Show Cause for the reasons set for in this Answer and awarding Respondents all costs, attorneys' fees, and interest thereon in having to defend this action; and,

4. For such other relief as the Agency deems just and proper.

Dated: July 6, 2007



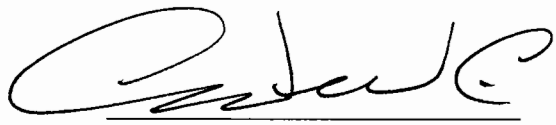
Christian W. Clinger
Clinger Lee Clinger, LLC
Attorney for Respondents

Certificate of Service

I hereby certify that the **NOTICE OF APPEARANCE OF COUNSEL** was hand delivered on July 6, 2007 to the following:

ORIGINAL

Administrative Court Clerk
c/o Pam Radzinski
Division of Securities
160 E. 300 S., Second Floor
Salt Lake City, UT 84114

COPY

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