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Attorney for Respondents U.S. Tiger, Inc. and Adam Calvin Leffler

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

IN THE MATTER OF: U.S.TIGER, INC. JARED BRENT MUIR, ADAM CALVIN LEFFLER Respondents.	RESPONSE TO ORDER TO SHOW CAUSE Docket No. SD-13-0007 Docket No. SD-13-0008 Docket No. SD-13-0009

Respondents U.S. Tiger, Inc. and Adam Calvin Leffler, by and through their attorney of record, Randall Lee Marshall, hereby responds to the Division's Order To Show Cause as follows:

Respondents respond to the specific allegations contained in each numbered paragraph of the Order To Show Cause as follows:

General Objection: Throughout the Order To Show Cause, there is continued reference to an "investment." Respondents deny that the money loaned was intended to be an investment but, rather, a loan. Respondents are answering the allegations without acknowledging that the

loans were investments.

1. Respondents admit that the Division has jurisdiction as alleged in paragraph 1 but denies that the allegations are true.
2. Respondents admit the allegations in paragraph 2.
3. Respondents admit the allegations in paragraph 3.
4. Respondents admit the allegations in paragraph 4.
5. Respondents deny the allegations in paragraph 5.
6. Respondents admit the allegations in paragraph 6.
7. Respondents admit the allegations in paragraph 7.
8. Respondents deny the allegations in paragraph 8.
9. Respondents deny the allegations in paragraph 9.
10. Respondents deny the allegation in paragraph 10
11. Respondents deny the allegations in paragraph 11 for lack of information or belief.
12. Respondents deny the allegations in paragraph 12 for lack of information or belief.
13. Respondents admit the allegations in paragraph 13.
14. Respondents admit the allegations in paragraph 14.
15. Respondents admit the allegations in paragraph 15 but affirmatively allege that the 1% ownership was demanded by L.G., not originally offered by Leffler.
16. Respondents deny the allegations in paragraph 16 for lack of information or belief.
17. Respondents deny the allegations in paragraph 17, including all of its sub-parts, for lack of information or belief.

18. Respondents deny the allegations in paragraph 18 for lack of information or belief.

19. Respondents deny the allegations in paragraph 19a.

20. Respondents deny the allegations in paragraph 19b.

21. Respondents admit the allegations in paragraph 19c.

22. Respondents admit the allegations in paragraph 19d but affirmatively allege that the 1% ownership was at L.G.'s insistence, not an original offer by Leffler.

23. Respondents deny the allegations in paragraph 19ef[sic].

24. Respondents deny the allegations in paragraph 19g.

25. Respondents deny the allegations in paragraph 19h.

26. Respondents deny the allegations in paragraph 19i.

27. Respondents deny the allegations in paragraph 19j.

28. Respondents admit the allegations in paragraph 19k.

29. Respondents deny the allegations in paragraph 19l.

30. Respondents deny the allegations in paragraph 19m.

31. Respondents deny the allegations in paragraph 19n.

32. Respondents admit that loans were made as alleged in paragraph 20 but deny that they were investments.

33. Respondents admit the allegations in paragraph 21.

34. Respondents admit the allegations in paragraph 22.

35. Respondents admit the allegations in paragraph 23.

36. Respondents admit the allegations in paragraph 24.

37. Respondents admit the allegations in paragraph 25.

38. Respondents admit the allegations in paragraph 26.

39. Respondents admit the allegations in paragraph 26a.

40. Respondents admit the allegations in paragraph 26b.

41. Respondents admit the allegations in paragraph 26c.

42. Respondents admit the allegations in paragraph 26d.

43. Respondents admit the allegations in paragraph 26k.

44. Respondents deny the allegations in paragraph 26m.

45. Respondents admit the allegations in paragraph 27.

46. Respondents deny the allegations in paragraph 28.

47. Respondents deny the allegations in paragraph 28a.

48. Respondents deny the allegations in paragraph 28b.

49. Respondents deny the allegations in paragraph 29 in that the information was disclosed verbally, although not in writing.

50. Respondents deny the allegations in paragraph 30 and further affirmatively allege that the allegations require conclusions of law.

51. Respondents deny the allegations in paragraph 31 and further affirmatively allege that the allegations require conclusions of law.

52. Respondents deny any and all allegations not specifically admitted herein.

53. Respondents affirmatively allege as a defense that L.G. was well versed in the medical field, and was very demanding as to what she would or would not do. She insisted on an

interest in the company and wanted to be involved in the manufacturing and distribution. The only promise Leffler made to L.G. or to S.S. was that they would be paid back when he had the manufacturing running properly and was making money. Leffler believed in good faith that he would have the manufacturing running soon after the loans were received; however, the manufacturing by Spectrum Packaging LLC was a failure. Leffler disclosed to L.G. and S.S. throughout the process that there were risks and that the product was not yet perfected, in spite of the pending orders.

DATED this 11th day of February, 2013.

MARSHALL LAW, PLLC:

RANDALL LEE MARSHALL,
Attorney for Respondents

CERTIFICATE OF MAILING

I hereby certify that, on this 11th day of ~~December, 2011~~ February 2013, I caused a true and correct copy of the foregoing RESPONSE TO ORDER TO SHOW CAUSE to be mailed, first class, postage prepaid, to the following:

D. Scott Davis
Assistant A.G.
Utah Division of Securities
160 East 300 South, 5th Floor
Salt Lake City, UT 84114-0872