

CAUSE NO. 2023-50248

ROBERT BERLETH, AS RECEIVER FOR	§	IN THE DISTRICT COURT
AND ON BEHALF OF JUDGMENT	§	
CREDITOR DEANGELO	§	
VEHICLE SALES, LLC	§	
v.	§	
	§	151st JUDICIAL DISTRICT
ADRIAN LEWIS PETERSON,	§	
ASHLEY PETERSON	§	
AEP GLOBAL ENTERPRISES, INC.	§	
a/k/a ELIZABELLA COSMETICS, and	§	
ADRIAN PETERSON ALL DAY, INC.	§	HARRIS COUNTY, TEXAS

DEFENDANTS' ORIGINAL ANSWER

Defendants Adrian Lewis Peterson, Ashley Peterson, AEP Global Enterprises, Inc., and Adrian Peterson All Day Inc. (collectively the "Defendants") file this Original Answer to Plaintiff's Original Petition and would respectfully show the Court as follows:

VERIFIED RESPONSES TO FACTUAL ALLEGATIONS

1. Defendants admit that a foreign judgment was domesticated against Adrian Peterson only and Robert Berleth was appointed as Receiver for Adrian Peterson only.
2. Defendants deny that any of them attempted to auction any non-exempt property on July 18, 2023.
3. Defendants admit that the Receiver searched storage units for Adrian Peterson and Ashley Peterson on or about July 20, 2023. Defendants further admit that one or more storage units had, at one time, been rented under the name of Adrian Peterson and were later changed to being held under the name of Ashley Peterson. However, that change had nothing to do with an attempt to hinder, defraud, or delay the Receiver or court.
4. Defendants can neither admit nor deny when the Receiver "discovered" anything. Adrian Peterson All Day Inc. and AEP Global Enterprises, Inc. d/b/a Elizabella

Cosmetics did both dissolve on or about July 28, 2023. However, the dissolution of these entities was done as a *tax forfeiture* by administrative action of the Texas Secretary of State, not by any affirmative action taken on the part of any of the Defendants.¹ These events are public record, and the Receiver knew or should have known that these were not affirmative actions taken by Defendants prior to filing his petition with this Court. As such, the Receiver appears to have purposely and knowingly misled the Court as to the action of Defendants in an attempt to disparage Defendants' character with the Court and to suggest an impropriety that the Receiver knew never happened.

5. Defendants can neither admit nor deny when the Receiver "discovered" anything. Defendants admit that Adrian Peterson was, at one time, identified as the President of AEP Global Enterprises, Inc. on filings with the Texas Secretary of State. However, Defendants deny being aware of Adrian Peterson's identification as President of AEP Global Enterprises, Inc. and deny that Adrian Peterson had anything to do with either AEP Global Enterprises, Inc. or Elizabella Cosmetics.

6. Defendants deny all allegations of fraudulently concealing assets.

II.

GENERAL DENIAL

7. Subject to the specific, verified factual denials set forth above, pursuant to Rule 92 of the Texas Rules of Civil Procedure, the Defendants generally deny all other allegations contained in Plaintiff's Original Petition and demand strict proof thereof by a preponderance of the evidence in strict accordance with the laws of the State of Texas.

¹ See Texas Secretary of State, File Number 800793351, Forfeiture pursuant to Section 171.309 of the Texas Tax Code of Adrian Peterson All Day, Inc.; Texas Secretary of State, File Number 802468770, Forfeiture pursuant to Section 171.309 of the Texas Tax Code of AEP Global Enterprises, Inc.

**III.
AFFIRMATIVE DEFENSES**

8. Plaintiff's claims are barred, either in whole or in part, by the applicable statute of limitations.

9. Defendants deny they can be liable in the capacity in which they are being sued.

10. Defendants reserve the right to amend their answer to assert additional factual matters and/or defenses in conformity with the Texas Rules of Civil Procedure and/or any order of the Court.

**III.
PRAYER**

WHEREFORE, Defendants urge the Court to deny all relief requested by Plaintiff and to further grant the Defendants such relief, in law or in equity, to which they may show themselves justly entitled.

SHEPHERD, SMITH, EDWARDS & KANTAS, LLP

/s/ Samuel B. Edwards

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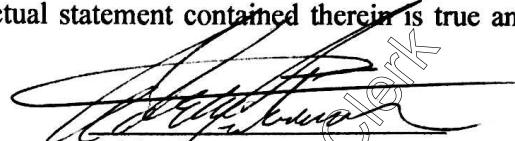
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ATTORNEYS FOR DEFENDANTS

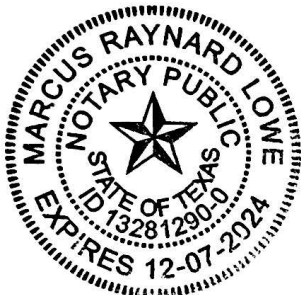
VERIFICATION

BEFORE ME, the undersigned authority, on this day personally appeared Adrian Peterson who, after being duly sworn, upon his oath deposed and stated that he is an individual defendant in this matter and authorized to make statements on behalf of the other Defendants in this matter. He has read the foregoing document and every factual statement contained therein is true and correct and within his personal knowledge.


Adrian Peterson

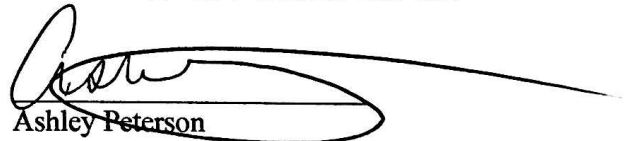
SWORN TO AND SUBSCRIBED before on this 8th day of March, 2024, to certify which, witness my hand and seal of office.


Notary Public in and for the
State of Texas

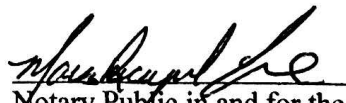


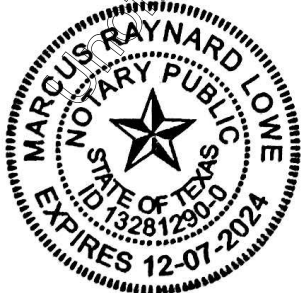
VERIFICATION

BEFORE ME, the undersigned authority, on this day personally appeared Ashley Peterson who, after being duly sworn, upon his oath deposed and stated that he is an individual defendant in this matter and authorized to make statements on behalf of the other Defendants in this matter. He has read the foregoing document and every factual statement contained therein is true and correct and within his personal knowledge.


Ashley Peterson

SWORN TO AND SUBSCRIBED before on this 8 th day of March, 2024, to certify which, witness my hand and seal of office.


Notary Public in and for the
State of Texas



CERTIFICATE OF SERVICE

I hereby certify that in compliance with Rule 21a, Texas Rules of Civil Procedure, a copy of the foregoing instrument was properly served on this 11th day of March, 2024, via Texas Efile.

/s/ Samuel B. Edwards
Samuel B. Edwards

Unofficial Copy Office of Marilyn Burgess District Clerk

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Status as of 3/11/2024 3:16 PM CST

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