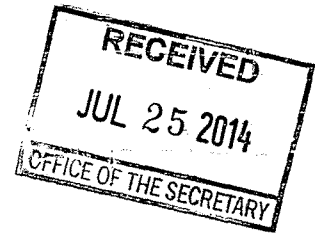


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-15941



In Re:
BioMedical Technology Solutions
Holdings, Inc., Chaolei Marketing and
Finance Company, Clear-Lite Holdings,
Inc., Encompass Group Affiliates, Inc.
(n/k/a Re-Act Enterprises, Inc.),
Hydron Technologies, Inc., Sun American
Bancorp, and **XenaCare Holdings, Inc.**

ANSWER OF
XENACARE HOLDINGS, INC.

ANSWER TO OIP OF XENACARE HOLDINGS INC.

COMES NOW XENACARE HOLDINGS, INC., and in response to the Order
Initiating Proceedings herein answers and states as follows:

II-A-(7)

XENACARE HOLDINGS, INC. denies that it has offices in Boca Raton, Florida.
XENACARE HOLDINGS, INC. admits it has not filed reports since the period ending
March 31, 2011. XENACARE HOLDINGS, INC. is without knowledge concerning
those who are empowered to sell shares of XCHO on the market.

II-B-(8)

XENACARE HOLDINGS INC. denies being properly noticed by the
Commission regarding delinquent filings, and observes that the address of record
formerly utilized by the Commission was in error, as XENACARE HOLDINGS INC.
relocated its corporate headquarters away from Boca Raton and now is situated in Tampa,
Florida.

All other allegations of the Order Initiating Procedures against XENACARE HOLDINGS, INC. are generally denied.

DEFENSES

In its defense, XENACARE HOLDINGS INC. would proffer and state as follows:

That subsequent to the date alleged, XCHO was set upon by individuals formerly associated with Organized Crime, to wit, Mr. Martin HODAS, who after acquiring a substantial, and eventually, controlling shareholder interest, attempted to cause senior management of the company to engage in a “pump and dump” scheme intended to make HODAS rich. When management refused, HODAS began a campaign of enmity, resulting in litigation in Florida, and, through an associated individual, litigation in Texas.

That subsequently, the Company was loathe to engage in further transactions or receive invested funds when the concerns about the influence of HODAS were still at issue;

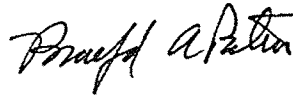
That the management of the company used its own limited funds to carry the litigation forward during the following period of time, despite being entitled to indemnification from the company;

That HODAS died in May, 2014, thereby causing the concern and pressures on the company’s management to subside to some degree.

That the company has been approached by no less than three other interested parties about merger or business consolidation and reorganization in 2014.

WHEREFORE, XENACARE HOLDINGS INC. denies that its registration under Rule 12(g) should be revoked.

Respectfully submitted this 25th day of July, 2014.



Digitally signed by Bradford A. Patrick, Esq.
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email=bradpatrick@baplegal.com, c=US
Date: 2014.07.25 13:35:22 -04'00'

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