

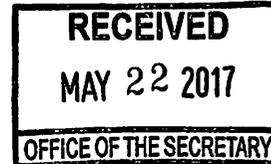
UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

In the Matter of

**International Building Concepts Ltd. (n/k/a
Home Builders International, Inc.),
RXBAZAAR, Inc.,
Victory Park Acquisition Corp. I, and
Worldwide Data, Inc.,**

Respondents.

ADMINISTRATIVE PROCEEDING
File No. 3-17897



ANSWER OF RESPONDENT VICTORY PARK ACQUISITION CORP. I

Respondent Victory Park Acquisition Corp. I (“Victory Park”), through its undersigned counsel, respectfully submits this Answer to the Securities and Exchange Commission’s (“SEC” or the “Commission”) Order Instituting Administrative Proceedings and Notice of Hearing Pursuant to Section 12(j) of the Securities Exchange Act of 1934 (the “Order”).

PRELIMINARY STATEMENT

Victory Park was formed on October 31, 2007 as a “public shell” acquisition corporation; a vehicle to investigate and, potentially, acquire a target company or business seeking the perceived advantages of being a publicly-held corporation. Victory Park registered its common stock with the Commission pursuant to Section 12(g) of the Securities Exchange Act of 1934, as amended (the “Exchange Act”). Despite investigating potential target corporations, Victory Park was never utilized in an acquisition, and fell dormant. Victory Park made its last periodic filing with the Commission, a Form 10-K/A for the fiscal year ended November 30, 2010, on February

28, 2011. As reflected that filing, as of February 28, 2011, there was only one Victory Park stockholder.

On March 27, 2017, prior to the issuance of the Order in this matter, Victory Park filed a Form 15-12G to withdraw its registration with the Commission. Victory Park respectfully requests that its withdrawal be allowed to go into effect on June 26, 2017, as prescribed by the Exchange Act and its rules. *See* 15 U.S.C. §78l(g)(4); 17 C.F.R. § 240.12g-4.

VICTORY PARK'S ANSWERS TO SPECIFIC ALLEGATIONS

A. RESPONDENTS

1. International Building Concepts Ltd. (n/k/a Home Builders International, Inc.) (CIK No. 1024271) is a Minnesota corporation located in Minneapolis, Minnesota with a class of securities registered with the Commission pursuant to Exchange Act Section 12(g). International Building Concepts Ltd. is delinquent in its periodic filings with the Commission, having not filed any periodic reports since it filed a Form 10SB12G registration statement on November 1, 1996, which reported a net loss of \$952,011 for the nine months ended June 30, 1996.

Response to Paragraph No. 1: Victory Park lacks sufficient information to admit or deny the allegations in Paragraph No. 1, and accordingly denies the same.

2. RXBAZAAR, Inc. (CIK No. 1115295) is a void Delaware corporation located in Cincinnati, Ohio with a class of securities registered with the Commission pursuant to Exchange Act Section 12(g). RXBAZAAR, Inc. is delinquent in its periodic filings with the Commission, having not filed any periodic reports since it filed a Form 10-Q for the period ended March 31, 2004, which reported a net loss of \$893,117 for the prior three months.

Response to Paragraph No. 2: Victory Park lacks sufficient information to admit or deny the allegations in Paragraph No. 2, and accordingly denies the same.

3. Victory Park Acquisition Corp. I (CIK No. 1423041) is a void Delaware corporation located in Chicago, Illinois with a class of securities registered with the Commission pursuant to Exchange Act Section 12(g). Victory Park Acquisition Corp. I is delinquent in its periodic filings with the Commission, having not filed any periodic reports since it filed a Form 10-K for the period ended November 30, 2010, which reported a net loss of \$34,432 for the prior twelve months.

Response to Paragraph No. 3: Victory Park admits the allegations in the first sentence of Paragraph No. 3. Victory Park states affirmatively that it made all required periodic filings with the Commission from the date it was formed up to and including filings for the fiscal year ended November 30, 2010. Victory Park further states that for the period ended November 30, 2010, it filed a Form 10-K on February 25, 2011, and a Form 10-K/A on February 28, 2011, and admits that it reported a net loss of \$34,432 for the prior twelve months. Victory Park admits that it was delinquent in its periodic filings for periods after the period ended November 30, 2010. Victory Park further states affirmatively that, on March 27, 2017, prior to the filing of the Order in this matter, it filed a Form 15-12G to withdraw its registration with the Commission. Victory Park denies any remaining allegations in Paragraph No. 3.

4. Worldwide Data, Inc. (CIK No. 945366) is a void Delaware corporation located in Toronto, Ontario, Canada with a class of securities registered with the Commission pursuant to Exchange Act Section 12(g). Worldwide Data, Inc. is delinquent in its periodic filings with the Commission, having not filed any periodic reports since it filed a Form 10-QSB for the period ended September 30, 2000.

Response to Paragraph No. 4: Victory Park lacks sufficient information to admit or deny the allegations in Paragraph No. 4, and accordingly denies the same.

B. DELINQUENT PERIODIC FILINGS

5. As discussed in more detail above, all of the Respondents are delinquent in their periodic filings with the Commission, have repeatedly failed to meet their obligations to file timely periodic reports, and failed to heed delinquency letters sent to them by the Division of Corporation Finance requesting compliance with their periodic filing obligations or, through their failure to maintain a valid address on file with the Commission as required by Commission rules, did not receive such letters.

Response to Paragraph No. 5: Insofar as the allegations in Paragraph No. 5 pertain to respondents International Building Concepts Ltd. (n/k/a Home Builders International, Inc.), RXBAZAAR, Inc., and Worldwide Data, Inc., Victory Park lacks sufficient information to admit

or deny the allegations in Paragraph No. 5, and accordingly denies the same. Victory Park admits that it was delinquent in its periodic filings with the Commission for periods after the period ended November 30, 2010, as set forth in its answer to Paragraph No. 3 above. Victory Park states affirmatively that it received a letter from the Commission's Division of Corporation Finance on or about November 9, 2016 indicating that Victory Park was not in compliance with its reporting obligations, and instructing Victory Park to consider whether it was eligible to terminate its registration with the Commission by filing a Form 15. After receiving this letter, Victory Park filed a Form 15-12G to withdraw its registration with the Commission on March 27, 2017. Victory Park does not presently have a record of receiving other delinquency letters from the Division of Corporation Finance, and on that basis can neither admit nor deny that the Division of Corporation Finance transmitted such letters. Victory Park states affirmatively that it has consistently maintained a valid address on file with the Commission as required by Commission rules. Victory Park denies all remaining allegations in Paragraph No. 5.

6. Exchange Act Section 13(a) and the rules promulgated thereunder require issuers of securities registered pursuant to Exchange Act Section 12 to file with the Commission current and accurate information in periodic reports, even if the registration is voluntary under Section 12(g). Specifically, Rule 13a-1 requires issuers to file annual reports, and Rule 13a-13 requires domestic issuers to file quarterly reports.

Response to Paragraph No. 6: Victory Park admits the allegations in Paragraph No. 6.

7. As a result of the foregoing, Respondents failed to comply with Exchange Act Section 13(a) and Rules 13a-1 and/or 13a-13 thereunder.

Response to Paragraph No. 7: Insofar as the allegations in Paragraph No. 7 pertain to respondents International Building Concepts Ltd. (n/k/a Home Builders International, Inc.), RXBAZAAR, Inc., and Worldwide Data, Inc., Victory Park lacks sufficient information to admit or deny the allegations in Paragraph No. 7, and accordingly denies the same. Victory Park

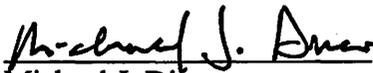
admits that it did not file periodic reports as required by Exchange Act Section 13(a) and Rules 13a-1 and 13a-13 thereunder for periods between November 30, 2010 and March 27, 2017.

PRESERVATION OF RIGHT TO AMEND

Victory Park hereby reserves the right to amend this Answer and to assert any affirmative defenses based on further analysis or to the extent that discovery proceeds and more information becomes available.

WHEREFORE, because Victory Park filed its Form 15-12G before the Order instituting proceedings in this matter was issued, Victory Park respectfully requests dismissal of the Order as to Victory Park, and further respectfully requests that its withdrawal be allowed to go into effect on June 26, 2017, as prescribed by the Exchange Act and its rules, and for such other and further relief that this forum deems just, proper, and equitable. *See* 15 U.S.C. §78l(g)(4); 17 C.F.R. § 240.12g-4.

May 12, 2017

Respectfully Submitted,

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*Counsel for Respondent Victory Park
Acquisition Corp. I*

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of May, 2017, a copy of the foregoing *Answer of Respondent Victory Park Acquisition Corp.* I was served upon the following:

By facsimile and U.S. Mail:

Office of the Secretary
U.S. Securities and Exchange Commission
100 F Street NE
Mail Stop 1090
Washington, DC 20549
Fax: (703) 813-9793

By email, at the direction of the Honorable James E. Grimes and by agreement among the parties:

Honorable James E. Grimes
alj@sec.gov

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