

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

The Manager of the Manufactured Homes and)
Modular Units Program of the Missouri Public)
Service Commission,)
)
Complainant,)
)
v.)
)
Charles W. Brune and Anna G. Brune d/b/a Brune)
Mobile Sales,)
)
Respondents.)

Case No. MC-2020-0135

**LIST OF ISSUES, ORDER OF WITNESSES, ORDER OF
CROSS-EXAMINATION, AND ORDER OF OPENING STATEMENTS**

COME NOW The Manager of the Manufactured Housing and Modular Units Program (“Manager”), and Charles W. Brune and Anna G. Brune, d/b/a Brune Mobile Sales, through counsel, and file their *List of Issues, Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements*.

1. Pursuant to the Commission’s February 21, 2020 *Order Adopting Procedural Schedule*, the parties are to file a list of issues, order of witnesses, order of cross-examination, and order of opening statements by May 18, 2020. This pleading is filed in satisfaction of this order.

LIST OF ISSUES

1. Did the Brunese violate § 700.100.3(6), RSMo and 20 CSR 4240.120-065(1)(C) by failing to arrange for the proper initial setup of the five manufactured homes which are the subject of this complaint?

2. Did the Brunese engage in conduct in violation of § 700.045(5), RSMo for failing to correct code violations within 90 days after being ordered to do so by the

Commission's authorized representative in the five manufactured homes which are the subject of this complaint?

3. Did the Brunese violate § 700.656.1, RSMo by installing a home without holding a valid installer's license issued by the Commission pursuant to § 700.650, RSMo to § 700.680, RSMo?

4. Did the Brunese violate § 700.656.3, RSMo by hiring unlicensed individuals to install the manufactured homes which are the subject of this complaint?

5. Did the Brunese violate § 700.096.1, RSMo and 20 CSR 4240-120.130(1) by failing to file monthly sales reports with the Commission for the five manufactured homes which are the subject of this complaint?

**ORDER OF OPENING STATEMENTS
AND LIST AND ORDER OF WITNESSES**

Thursday, May 28, 2020:

9:00 A.M. Opening Statements

Staff
Brunese

Testimony

Staff:

Justin Smith
David Freeman

Brunese:

Charles Brune

ORDER OF CROSS EXAMINATION

Staff's Witness	Brunes' Witnesses
Brune	Staff

Respectfully submitted,

/s/ Karen E. Bretz

Karen E. Bretz
Senior Counsel
Missouri Bar No. 70632
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-751-5472 (Voice)
573-751-9285 (Fax)
Karen.Bretz@psc.mo.gov

LICHTENEGGER LAW FIRM

/s/ Thad M. Brady

Thad M. Brady, #59659
2480 East Main Street Suite E
Jackson, MO 63755
Office: (573) 243-8463
Fax: (573) 243-3946
Email: thad@semolawfirm.com

ATTORNEY FOR RESPONDENTS

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 18th day of May, 2020.

/s/ Karen E. Bretz