

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED⁴

OCT 19 2004

Director of the Manufactured Housing and
Modular Units Program of the Public
Service Commission,

Complainant,

v.

America's Home Brokers, Inc.,

Respondent.

Missouri Public
Service Commission

Case No. MC-2005-0028

RESPONSE TO ORDER TO SHOW CAUSE

Comes now Respondent, by and through counsel, and hereby responds
to Order to Show Cause as follows:

1. On September 28th, 2004, the Commission issued an Order to Show Cause as to why the Commission should not revoke America's Home Broker's registration under the provisions Section 700.100 RSMo 2000, as the Commission had previously found Respondent to be in default.
2. On September 28th, 2004, the Respondent, through counsel, filed a Motion to Set Aside Default Order and Request for Additional Time to File Answer.
3. Respondent still desires that Commission set aside the default order and allow the Respondent additional time in which to file an answer. To the best of Respondent's knowledge, the Motion to

Set Aside the Default Order has not been ruled upon.

4. Respondent requests that his registration not be revoked. Respondent understands that the Commission currently considers him in default, however, Respondent is attempting to change that status. Because of the default order, the Respondent has not fully had an opportunity to answer the charges and allegations brought against him.
5. The Respondent has retained counsel in an attempt to remedy any disputes with the Commission and once again place America's Home Brokers in good standing with the Commission.
6. The Respondent did not fully understand the charges and allegations leveled against him in the Complaint and desires an opportunity to rectify this matter through counsel.
7. Additionally, pursuant to Section 700.100 RSMo 2000, the Commission has the option to suspend, revoke or place on probation a dealer's registration. The Respondent respectfully requests that should the Commission not grant Respondent's Motion to Set Aside Default Order that the Commission consider the lesser actions of probation or suspension as opposed to revocation.

WHEREFORE, for reasons stated above the Respondent requests that his registration not be revoked and that the Commission approve Respondent's Motion to Set Aside Default Order.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

Filed through EFIS

The undersigned does hereby certify that a true and correct copy of the foregoing was delivered to the following this 14 day of October, 2004 to: Ms. Mary E. Weston, Assistant General Counsel, P.O. Box 360, Jefferson City, MO 65102.

