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April 30, 2002

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

RE: Case No. WA-2002-65

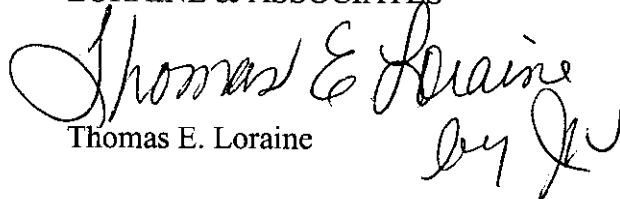
Dear Mr. Wright:

Enclosed please find the one (1) original and fourteen (14) copies of our **INITIAL BRIEF ON BEHALF OF THE HANCOCK CONSTRUCTION COMPANY** and **PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW** in the above-referenced matter to be filed with the Commission. Please file-stamp a copy for our records.

Your attention to this matter is greatly appreciated.

Very truly yours,

LORAIN & ASSOCIATES


Thomas E. Loraine

TEL/jw

Enclosures

Hancock/filingPSC 4-30-02

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

In the matter of the application of Environmental Utilities,)
LLC, for Permission Approval and Certificate of)
Convenience and necessity Authorizing it to Construct)
Install, Own, Operate, Control, Manage and Maintain)
A Water System for the Public Located in Unincorporated)
Portions of Camden County, Missouri (Golden Glade)
Subdivision))

CASE #: WA-2002-65

**INITIAL BRIEF ON BEHALF OF
THE HANCOCK CONSTRUCTION COMPANY**

Filed by Thomas E. Loraine

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CASE #: WA-2002-65

**INITIAL BRIEF ON BEHALF
OF THE HANCOCK CONSTRUCTION COMPANY**

I. Introduction:

Comes Now Hancock Construction Company (Hancock), by its attorney, Thomas E. Loraine, and for its Initial Brief in this matter, offers the following discussion and argument.

Substantial evidence was presented by all parties through direct, rebuttal, surrebuttal and cross examinations and exhibits by the following.

Witnesses:

Hancock Construction Company

- 1) David Hancock
- 2) William J. Cochran P.E.

Environmental Utilities L.L.C.

- 1) Ms Williams

Staff

- 1) Mr. Russo
- 2) Mr. Merciel P.E.
- 3) Mr. Johansen
- 4) Mr. Hummel

Public Counsel

- 1) Ms Bolin

II. Position of Hancock:

A. Hancock opposes granting a Certificate of Convenience and Necessity (CCN) to Environmental Utilities L.L.C. (EU) . Hancock believes proper management of the Osage Water Company (OWC) through retention of viable assets, increased revenue inflow through added CCN's and customers is in the best interest of O.W.C.'s remaining 150 to 200 customers as well as for the proposed eight (8) people residing within the Golden Glade Subdivision.

This is true for two reasons. Firstly, the eight residents of Golden Glade Subdivision presently have availability to a water supply through their property owners association as agreed by Mr. Mercial. (Tr. 351, 9-23). This is a less expense alternative available to them. Secondly, should those eight (8) residents and any of their fellow residents desire, they are immediately adjacent to facilities, both well and distribution system, operated by O.W.C., a presently certificated public utility. (Tr. 309, 17, Tr. 345, 1-25, and Tr. 346, 1-24).

It is further the position of Hancock, that Mr. Williams has been a primary management voice in the affairs of O.W.C. in the past. (Ex. 10, 2, 11; Ex. 10, 3, 1-6; Ex. 10, 6, 11-15). (See Ex 22 and 23). (Annual reports signed by Williams as president), Mrs. Williams, Ex. 1, (application schedule).

Mr. Williams has been president from 1996 to 2000, secretary and general counsel of O.W.C. since 1994. (Tr. 70, 2-6, Tr 376, 1-23). He still maintains control after the departure of Mr. Mitchell through his surrogate, Mrs. Williams. An examination of Mrs. Williams' knowledge was exhibited on cross of Staff's counsel.

Mrs. Williams demonstrated confusion and lack of credibility on numerous questions, (Ex. 12) was a letter she had written to customers of O.W.C. (Tr. 50, 7-10, 25 and Tr. 51, 7-24; Tr. 53, 1-25; Tr. 54, 1-25). When asked about the existence of a contract for wholesale water

between Osage Water Company and Environmental Utilities, she did not know. (Tr. 55, 7-15).

Likewise, Mrs. Williams was generally ill informed to be testifying as a manager for O.W.C. and a proposed manager for Environmental Utilities. (Tr. 63, 2-8; Tr. 63, 14-17; Tr. 66, 1-11). Mrs. Williams was very lacking with answers on credible cross examination by Ms. O'Neill for Public Counsel. (Tr. 70, 10-25; Tr. 71, 2-25; Tr. 83, 3; Tr. 83, 11, 14 & 17).

In Mrs. Williams application for C.C.N., she admitted that Greg Williams through O.W.C. has been actively involved in the management of the water company (O.W.C.) since 1991. (Tr. 92, 21-25; Tr. 93, 1-25). But, she testified that she and Mr. Williams did not have substantial knowledge and information nor much authority about the way O.W.C. practiced over the years. (Tr. 91, 4-25). But she would prefer that the Commission consider she and Mr. Williams as being in the water and sewer utility business since 1991. (Tr. 94, 1-24). Mrs. Williams claimed recently within the last six (6) months, the company records are being kept in accordance with the NARUC Accounting System. (Tr. 97, 18-25; Tr. 98, 1-2). But any past violation of NARUC was Mr. Mitchell's responsibility. (Tr. 98, 3-14). She did, however, admit after reading Mr. Williams prior sworn testimony that keeping records in conformance with NARUC had been the claimed responsibility of Greg Williams as early as 1998. (Tr. 98, 15-20; Tr. 99, 1-25 and Tr. 100, 1-22).

Mrs. Williams examined Ex. # 14, the debenture given by O.W.C. to Mr. Hancock and admitted it was signed by her husband on behalf of O.W.C. (Tr. 103, 7-14). Mrs. Williams recognized that the debt to Hancock was delinquent (Tr. 101, 5-11) and that the debenture has been issued to settle a lawsuit in 1998. (Tr. 101, 19-25).

As a result of the past management practices of O.W.C., the company had been extremely litigious and has spent hundreds of thousands of dollars on Mr. Williams' legal fees and has

worked hard to circumvent adherence to administrative regulations and orders historically. (Ex. 10, 6, 11-13; Ex. 10, 7, 7-22; Ex. 10, 8, 15-24; Ex. 10, 9, 1-24; Ex. 10, 11, 1-22; Ex. 10, 12, 1-16).

Mrs. Williams has been the manager of O.W.C. since July of 2001, but a director of O.W.C. since 1996, (Tr. 69, 1-3). During that time old practices have generally continued in failures to properly document audit trails on equipment and facilities. (Ex.10, 3, 23; Ex.10, 4, 1-11; and Ex. 10,10, 11-23). Record keeping inability of O.W.C. has been inherited to Environmental Utilities, L.L.C.; (Tr. 372, 1-5). In addition, O.W.C. has been accused of unlawfully overcharging ratepayers since her management began in July of 2001. (Ex. 10, 3, 8-12). See also (Tr. p. 402, 7-23).

As a result of single management voice for both O.W.C. and Environmental Utilities, L.L.C. (herein after called E.U.); (Tr. 363, 5-25 and Tr. 366, 4-23). See also (Tr. 534, 1-18) and in answer to Commissioner Lumpe. (Tr. 555, 6-15). It is axiomatic to conclude that the management will continue to operate in a litigious manner always on the edge if illegal operation and generally impervious to P.S.C. rules, orders, and even Disposition agreements. (Ex. 10, 21, 1-20).

In the past, with essentially the same management O.W.C. has operated illegally; (Ex. 10, Schedules 5 and 2); even with the D.N.R. (Ex. 10, 16, 20-24; Ex. 10, 17, 1-24; Schedule 12, Schedule 2, Schedules 4-1, and 4-2; Schedule 5; Schedule 6-1, and 6-2).

Mr. Marciel (Tr. 403, 11-25 and Tr. 404, 2-12), Mr. Johansen (Tr. 416, 1-3), and Mr. Hummel (Tr. 529, 23-25 and Tr. 530, 1-13), agree that E.U. can not serve the proposed customers of Golden Glade without an agreement to use O.W.C.'s facilities and services. Yet, Mr. Williams demonstrated that O.W.C. was no longer a reliable utility and probably was subject

to demise (Ex. 28 Minutes of the last meeting of O.W.C., Board of Directors). Further, he attempted transfer of O.W.C.'s viable assets such as Golden Glade well system, (Tr. 381, 1-12) excavator and bobcat to E.U., a matter that will not be well received by Mr. Hancock, who holds a considerable debenture of \$225,000.00 value. (Ex. 14; Ex. 10, 22, 3-12; Schedules 17-1, 17-2, 17-3, 17-4 and 17-5). Said debenture was further explained to be in the rate base by Keith R. Krueger, Esquire, Deputy Counsel for P.S.C. (Ex. 14).

In addition, Mr. Hancock is a substantial preferred stock holder (Tr. 570, 14-20; Tr. 578, 19-21).

B. Relief sought by Hancock

Hancock asks that the Commission not issue a certificate to EU.

Mr. Marciel (Tr. 352, 4-25 and Tr. 353, 1) and Mrs. Williams in her application see application (Ex. 2, 12 & 13) required an agreement to supply as a wholesale distributor, water from O.W.C. In fact, Public Counsel (Tr. 356, 1-22) and the Commission members alluded to this in cross examination of Mr. Marciel (Tr. 352, 22-25 and Tr. 353, 1). Record keeping would become more important than ever as between O.W.C. and E.U. Marciel (Tr. 362, 3-11) and (Tr. 372, 1-5).

Query, as to how this will be accomplished, that is, the transferring of assets from O.W.C. to E.U. with Mr. Hancock seeking collection of this debenture and liquidation of his preferred stock? Surely Staff, office of Public Counsel or the P.S.C. will so consider the impact of the new C.C.N. request upon the public that is being supplied water and sewer service presently under C.C.N., with O.W.C. Anything that would make the viability of O.W.C.'s service less reliable for those customers could not be in the best interest of the public whom these august state entities are sworn to protect. Depriving O.W.C. of customers, expansions of service and allowing

competition with E.U. cannot serve the interest of the public. It serves only the interests of management of E.U. and thereby violates the fifth Tartan Criteria. Tartan Energy Company, case No. GA-94-127, In the matter of the Application of Tartan Energy Company, 3 Mo. P.S.C. 3d 173,177 (1994) hereinafter referred to as (Tartan).

C. Factual- The Tartan Criteria from Tartan Energy Company Case No. GA-94-127, *In the Matter of the Application of Tartan Energy Company*, 3 Mo. P.S.C. 3d 173, 177, (1994) hereinafter (Tartan)

- 1. IS THERE A NEED FOR SERVICE?**
- 2. IS THE APPLICANT QUALIFIED?**
- 3. DOES THE APPLICANT POSSESS THE FINANCIAL ABILITY TO PROVIDE SERVICES?**
- 4. IS THE APPLICANT'S PROPOSAL ECONOMICALLY FEASIBLE?**
- 5. DOES THE SERVICE PROMOTE THE PUBLIC INTEREST?**

FACTUAL ISSUE #1 IS THERE A NEED FOR SERVICE?

There is no need for EU service. O.W.C. already has a CCN for sewer service in Golden Glade subdivision. In awarding O.W.C. a water certificate to serve Eaglewoods Subdivision, the Commission relied on Company assurances that the Golden Glade Well was owned by OWC. See Merciel cross examination at (Tr. 370, 12-25; Tr. 371, 1-25; Tr. 380, 11-16 and Tr.381, 1-12). Bad record keeping allows for easier misrepresentation to the Commission and more difficult audits for Staff. (Tr. 374, 11-25 and Tr. 375, 1-18). The Commission also relied on assurances that O.W.C. would use this well, distribution mains, excavator and bobcat to serve Eaglewood customers. There is no need for EU service to Golden Glade's eight (8) customers, they are already being served by O.W.C. or if they should so chose Golden Glade's own

homeowner's association.

FACTUAL ISSUE #2

IS THE APPLICANT QUALIFIED?

The Applicant is not qualified to operate a water system. The Commission awarded O.W.C. CCN's for Parkview Bay , North Osage Beach and South Osage Beach. O.W.C. is not serving any customers at Parkview Bay and has lost most and will lose all Osage Beach Customers in the very near future (Ex. 10, 5 and 6, 4-23; Ex. 10, 6, 1-23 and Ex. 10, 7, 1-6) (Ex. 28).

Mr. Williams has made all policy decisions as majority stockholder, President, Secretary, General Counsel and hired outside counsel since 1994. (Ex. 10, 2, 9-27 and Ex. 10, 3, 1-5). As the sole management voice he has allowed O.W.C. to lose over 50% of its customers. These lost customers and revenue are due solely to Mr. Williams' incompetence, misrepresentations, illegal, illusionary and hazardous operations combined with his ongoing callous disregard for the public. (Ex. 10, 5, 4-23; Ex. 10, 6, 1-23; Ex. 10, 7, 1-6; Ex. 10, 10, 11-25; Ex. 10, 11, 1-23; Ex. 10, 12, 1-16; Ex. 10, 16, 21-24; Ex. 10, 17, 1-4; Ex. 10, 18, 1-4 and Ex. 10, Schedules 2, 5,6,13,14,16,17,18,& 19). Staff has confirmed Mr. Williams incompetence by excluding O.W.C. 's Parkview Bay and Osage Beach assets from rate base (TR 456, 2-13). City of Osage Beach replacement of Mr .Williams' (Ex. 10, 8, 1-24 & Ex. 10, 9, 1-15 and Schedule 2) water systems at Parkview Bay and in the City of Osage Beach confirm he is not competent to build, construct, install, own, operate, manage and maintain public water systems.

Mrs. Williams and E.U. must be qualified to run a public utility. The most important part of that qualification is the ability to keep records so as to establish a quality audit trail. Records must be kept in accordance with NARUC USOA. (Tr. 420,1-9). Historically, O.W.C. records keeping in accordance with the P.S.C. orders and regulations is dismal (Tr. 423, 1-12). Studying

this historic approach of O.W.C. is relevant to the qualifications of E.U. under this category of Tartan. (Tr. 423, 13-16). To not have records in accordance with the P.S.C. mandates would go to another of the Tartan Criteria, that of promoting the public interest. (Tr. 423, 17-25). Mr. Johansen testified that he has concerns with economic feasibility and with qualifications of E.U.'s application in the case at bar (Tr. 424, 19-24).

FACTUAL ISSUE #3

**DOES THE APPLICANT POSSESS THE
FINANCIAL ABILITY TO PROVIDE SERVICES?**

Mr. Cochran has testified voluminously on the incompetence of O.W.C. and Mr. Williams both in this case Ex. 10 supra and infra. (Ex. 10, 12, 1-11) and in other matters before the P.S.C. (Ex. 10, 12, 12-16). Since this criteria is central to the Tartan criteria, Mr. Johansen's testimony on this subject are also relevant for the Commission's considerations.

Mr. Johansen agreed that proper rate base depended on good records and that was in the public interest. (Tr. 423, 17-25). He further agreed that a historic review of O.W.C. was relevant in a determination of the qualifications of Environmental Utilities, L.L.C. (Tr. 423, 13-16). He readily admitted the history of O.W.C. in record keeping was dismal (Tr. 424, 2-6). The annual reports filed by O.W.C. for 1998 in 1999 were not in compliance in NARUC. (Tr. 444, 2-5). An examination of this report on cross examination revealed a staff audit in between the 1998 annual report filed by O.W.C. and the 1999 annual report. (Tr. 451, 22-25). The annual reports of 1998 and 1999 were filed delinquent. (Tr. 452, 1-3). Furthermore, there was rate base according to the audit by Staff of the P.S.C. of only \$243,976.00. (Tr. 452, 4-7). An examination of the annual reports against Staff's audit revealed a substantial discrepancy of a million dollars in plant reported. (Tr. 452, 8-19 and Tr. 454, 6-9).

Mr. Johansen admitted on further cross examination of knowing only one other situation

where a disagreement exist between the P.S.C. staff and the company of a half a million dollars. (Tr. 454, 21-25). He did admit that this was very unusual (Tr. 455, 1-2). He did admit that the million dollar discrepancy of plant for O.W.C. was the worst. (Tr. 455, 3-7).

Mr. Johansen did recall that the Parkview Bay issue was not allowed in Staff's rate base for the most recent rate case. (Tr. 455, 8-23). The Parkview Bay rate base is no longer allowed by staff because its not used and useful. (Tr. 456, 8-13).

The record keeping has created problems and culminated in a Disposition Agreement recommendation by staff in case No. 2000-557. (Tr. 456, 23-25 and Tr. 457, 1-19). Mr. Johansen opined that the Commission should be aware that a special provision imposed to demand proper record keeping may not work with Environmental Utilities, L.L.C., given the management personnel would be the same as that of O.W.C. (Tr. 467, 5-23). This would be especially true since O.W.C.'s 1999 report still does not comply with the P.S.C. regulations even with the new management team of Mrs. Williams. (Tr. 468, 1-25, and Tr. 469, 1-2). Some improvement in records are occurring in the last six (6) months, according to Mr. Russo, but the record keeping problem stems from a historical perspective of over ten (10) years with O.W.C. (Tr. 478, 1-23).

According to Mr. Johansen's testimony on cross examination, there appears to be additional problems with the reporting and cost sharing of equipment between O.W.C. and E.U. In view of the probable demise of O.W.C. the wholesale water agreement necessary between E.U. and O.W.C. (Tr. 481, 4-25 and Tr. 482, 1-25), these problems all should be closely examined in any decision to grant CCN under the Tartan Criteria. (Tr. 481, 23-25 & Tr. 482, 1-25).

In the case at bar before the Commission witness, Johansen believes that this dual usage

of equipment, shared costs, is even more complicated by the fact that the bobcat and the excavator are now personally owned by the Williams. This will further complicate record keeping for NARUC. (Tr. 484, 1-12).

Mr. Johansen concluded his re-cross testimony by admitting that the 1999 annual report for O.W.C. was filed delinquent on November 28, 2001. (Ex. 26A and 26B, Tr. 512, 14-25). These are requested by Commissioner Murray. (Tr. 514, 11-15). Ex. 26A was signed by Mr. Williams (Tr. 516, 10-12) and 26B was signed by Pat Mitchell as president for O.W.C. (Tr. 516, 20-24).

EU does not have the financial ability to provide services. Mr. Williams' history of not paying valid debts recognized in rates by Commission as the Hancock Debenture (Exhibit 10 Schedule 17), refusal to use NARUC USOA books and records to identify OWC hard assets and collateral (Ex. 10, 10, 11-23), documented and found illegal activities, (Ex. 10, 11, 5-8; Ex. 10, 3, 4-12 and Schedule 5) documented unauthorized striping out of a water tank asset from the Pizza Hut water system (Ex. 10, 11, 9-22; Ex. 10, 12, 1-4 and Schedule 6) has produced specific replies to Mr. Williams from potential investors such as from Stern Brothers, Linn Mercantile Bank and the Vernon Stump Investment Group (Ex. 10, 10, Schedules 3 and 15). As a result, Mr. Williams cannot produce one document showing EU will have the financial ability to serve 8 or more customers. (Ex. 8, 1, 5-25 and Ex. 8, 2, 1-10). See also (Tr. 390, 10-25 and Tr. 391, 1-3).

**FACTUAL ISSUE # 4. IS THE APPLICANT'S PROPOSAL
ECONOMICALLY FEASIBLE?**

This proposal is not economically viable. (Ex. 11, 1, 15-29, and Ex. 11, 2, 1-11). (Tr. 557, 10-24). The Applicants have identified the "cost" of the Golden Glade "Well house" and "Distribution System" at \$76,323.00 on Ms. Williams' Schedule EU-2 attached to her

surrebuttal. Even though these alleged records were available prior to November 21, 2001, these costs were not verified by Staff Accountant Russo until November 29th eight days after he filed rebuttal. (Ex. 2, 2 and 3).

Mr. Russo's belated visit to confirm that EU was in conformance with NARUC USOA and Staff could do a "rate base calculation" later (Tr 257) documents why engineers, not accountants, determine a rate base.

Engineers qualify and quantify rate base. Engineers not accountants determine the configuration, capability, capacity and function of water plant through examination of NARUC USOA Accounts identified on Page W-5 of the Commission's Annual Report form.

Mr. Cochran excluded a plant from Kansas City Power and Light's rate base. His position was upheld through the Eighth Circuit Court of Appeals (Ex. 10, 1 and 2). Commission's Annual report Page W-5 shows there is no NARUC USOA for a Well house nor a distribution system. Based on Ms. Williams Schedule EU-2, one wonders how Mr. Russo could come to the conclusion Staff could do a rate base calculation and EU was conforming to all NARUC USOA.

Mr. Russo also fails to recognize O.W.C.'s inability to follow all Commission regulatory requirements. (Tr 258). Page W-5 from OWC's 1999 Annual Report (Exhibit 26B) shows. O.W.C. does not report any pumping plant, water treatment plant nor transmission and distribution mains other than meters. Given the Case 2000-557 Disposition Agreement requirements (Ex. 10, Schedule 15) one wonders how Mr. Russo could believe O.W.C. is configured to have the capability and capacity to function as a water company since its NARUC USOA accounts indicate it cannot deliver and meter one drop of water to any customer according to annual reports to P.S.C. (Tr. 440, 15-25, and Tr. 441,1).

An engineer qualified and quantified rate base calculation is impossible without proper

identification of NARUC USOA assets. And, absent credible records, economic analysis of eight (8) customers being served from an alleged \$76,323.00 water system is unsupportable. (Ex. 2 Schedule EU 2, 1).

Even Mr. Johansen agrees unequivocally that those eight (8) homes can not justify expense of digging a well and placing distribution lines and that this project is simply not economically feasible (Tr. 419, 11-15), and there is the same concern by Mr. Hummel. (Tr. 529, 23-25 and Tr. 530, 1-13).

The alleged "wholesale agreement" as support for economic viability of EU does not exist. There is no wholesale agreement because Mr. Williams' own Exhibit 28 containing the minutes of OWC's Board of Directors meeting identifies that OWC will not continue in business to enter into any wholesale agreement. (Ex. 10, 23, 3-17 and Ex. 28).

**FACTUAL ISSUE #5 DOES THE SERVICE PROMOTE THE PUBLIC
INTEREST?**

It is not in the public interest to award a CCN to the same principals using illegal operations, unlawful collection of revenue and impervious attitude regarding Commission Rules, orders, and disposition agreements. They have demonstrated they cannot construct, install, own, operate, control, manage and maintain water systems and based on the principals' own Exhibit 28, all 150 to 200 remaining OWC customers will soon have to find alternate water suppliers. (Ex. 10, 23, 10-17; Ex. 10, 2, 18-25; and Ex. 28).

CONCLUSION

Mr. Cochran's testimony was not rebutted by credible evidence and was not cross examined at trial. The credible evidence submitted leads to one inescapable conclusion. No certificate for convenience and necessity can be issued based on substantial competent evidence

produced in this hearing.

The vast weight of credible evidence supports a denial and any decision to the contrary would be overturned by a reviewing Court.

Therefore, for the reasons herein stated, the arguments set forth; the competent evidence considered; the matters of credibility herein stated and reflected in the whole record, Hancock respectfully prays that the Commission deny the Certificate of Convenience requested in WA-2002-65 in that the applicant failed to meet the Tartan Criteria.

Respectfully submitted,

LORAIN & ASSOCIATES



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ATTORNEY FOR HANCOCK CONSTRUCTION
COMPANY

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

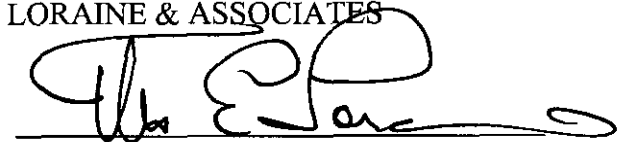
In the matter of the application of Environmental Utilities,)
LLC, for Permission Approval and Certificate of)
Convenience and necessity Authorizing it to Construct)
Install, Own, Operate, Control, Manage and Maintain) **CASE #: WA-2002-65**
A Water System for the Public Located in Unincorporated)
Portions of Camden County, Missouri (Golden Glade)
Subdivision))

CERTIFICATE OF SERVICE

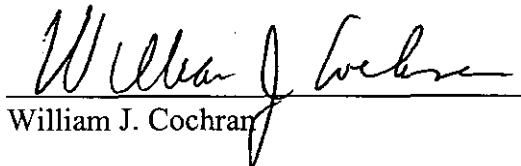
It is hereby certified that a true and correct copy of **INITIAL BRIEF ON BEHALF
OF THE HANCOCK CONSTRUCTION COMPANY** was mailed hard copy, postage
prepaid, this 30th day of April, 2002, **VIA CERTIFIED/RETURN RECEIPT REQUESTED**
to **Gregory D. Williams**, Highway 5 at Lake Road 5-32, P.O. Box 431, Sunrise Beach, MO.
65079, and **HAND DELIVERED** by William Cochran to Office of Public Counsel, P.O. Box
7800, Jefferson City, Missouri 65102 and General Counsel, Missouri Public Service
Commission, P.O. Box 360, Jefferson City, Missouri 65102, and mailed by U.S. mail hard copy,
first class, postage pre-paid this 30th day of April, 2002 to the Presiding Commissioner, Camden
County Courthouse, 1 Court Circle, P.O. Box 960, Camdenton, Missouri 65020, and Missouri
Department of Natural Resources, 205 Jefferson Street, Jefferson City, Missouri 65101.

Respectfully submitted,

LORAIN & ASSOCIATES



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(573) 348-8909



William J. Cochran

ATTORNEY FOR HANCOCK CONSTRUCTION

Subscribed and sworn to before me, a notary public, this 30 day of April, 2002.


Notary Public

My commission expires:

12/22/2002

