

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**

**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 *Second List of Issues, Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements.*

1. Pursuant to the Commission's June 5, 2020 *Second 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 July 8, 2020. This pleading is filed in satisfaction of this order.

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

5. Did the Brunos violate § 700.096.1, RSMo and 20 CSR 4240-120.130(1) by failing to file monthly sales reports with the Commission?

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

**Monday, July 27, 2020:**

**9:00 A.M. Opening Statements**

Staff  
Brunos

**Testimony**

**Staff:**

Justin Smith  
David Freeman  
Elizabeth Schemel  
Debbie Fox  
Robert Thomas  
Kirby Klaus

**Brunos:**

Charles Brune  
Dennis Bohnert  
Charles Whitmarsh

**ORDER OF CROSS EXAMINATION**

<b>Staff's Witness</b>	<b>Brunes' Witnesses</b>
Brune	Staff

Respectfully submitted,

**/s/ Karen E. Bretz**

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**/s/ Thad M. Brady**

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ATTORNEY FOR RESPONDENTS  
**LICHTENEGGER LAW FIRM**

**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 8<sup>th</sup> day of July, 2020.

**/s/ Karen E. Bretz**