

Richard E. Lenza

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March 15, 2004

VIA FAX – 573-751-8285 and OVERNIGHT DELIVERY FILED
MAR 1 6 2004

Missouri Public Service Commission 200 Madison Street Jefferson City, MO 65101

Missouri Public Service Commission

RE: The Staff of the Missouri Public Service Commission v.

Kansas City Executive Suites, Inc.

Case No.: TC-2004-0408

Dear Sir or Madame:

Enclosed please find Respondent's Answer with respect to the above-referenced matter. Enclosed also is a copy of the Answer. Please return a file-stamped copy to this office in the self-addressed, stamped envelope.

Very truly yours,

RICHARD E. LENZA

REL:jkc

Enclosures

cc: Bruce H. Bates, Esq.

BEFORE THE ADMINISTRATIVE HEARING COMMISSION STATE OF MISSOURI JEFFERSON CITY, MISSOURI MAR 1 6 2004

THE STAFF OF THE MISSOURI PUBLIC COMMISSION)	service Commission
)	Case No.TC-2004-0408
Complainant	,	
vs.)	
KANSAS CITY EXECUTIVE SUITES, INC.)))	

RESPONDENT ANSWER

Comes now Respondent, Kansas City Executive Suites, Inc. by and through its counsel and in answer to the Complaint of the Staff of the Missouri Public Service Commission states:

- 1. In response to paragraph 1 of the Complainant's Complaint, Respondent denies Complainant's allegations contained in Paragraph 1 in that Respondent is no longer operating as a "telecommunications company" and "public utility".
- 2. In response to Paragraph 2 of Complainant's Complaint, the Respondent admits only to the extent that the Office of the Secretary of State of Missouri's official website states that the Respondent was administratively dissolved on February 13, 2004.
- 3. In response to Paragraph 3 of Complainant's Complaint, the Respondent admits Complainant's allegations contained in Paragraph 3.

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- 4. In response to Paragraph 4 of Complainant's Complaint, the Respondent admits Complainant's allegations contained in Paragraph 4.
- 5. In response to Paragraph 5 of Complainant's Complaint, the Respondent admits Complainant's allegations contained in Paragraph 5.
- 6. In response to Paragraph 6 of Complainant's Complaint, the Respondent admits Complainant's allegations contained in Paragraph 6.
- 7. In response to Paragraph 7 of Complainant's Complaint, the Respondent admits Complainant's allegations contained in Paragraph 7
- 8. In response to Paragraph 8 of Complainant's Complaint, Respondent has insufficient information to admit or deny Complainant's allegations and therefore, denies the allegations contained in Paragraph 8.
- 9. In response to Paragraph 9 of Complainant's Complaint, Respondent has insufficient information to admit or deny Complainant's allegations and therefore, denies the allegations contained in Paragraph 9.
- 10. In response to Paragraph 10 of Complainant's Complaint, the Respondent admits Complainant's allegations contained in Paragraph 10.
- 11. In response to Paragraph 11 of Complainant's Complaint, the Respondent admits Complainant's allegations contained in Paragraph 11.
- 12. In response to Paragraph 12 of Complainant's Complaint, Respondent has insufficient information to admit or deny Complainant's allegations and therefore, denies the allegations contained in Paragraph 12.

- 13. In response to Paragraph 13 of Complainant's Complaint, Respondent has insufficient information to admit or deny Complainant's allegations and therefore, denies the allegations contained in Paragraph 13.
- 14. In response to Paragraph 14 of Complainant's Complaint, Respondent has insufficient information to admit or deny Complainant's allegations and therefore, denies the allegations contained in Paragraph 14.
- 15. In response to Paragraph 15 of Complainant's Complaint, Respondent has insufficient information to admit or deny Complainant's allegations and therefore, denies the allegations contained in Paragraph 15.
- 16. In response to Paragraph 16 of Complainant's Complaint, Respondent has insufficient information to admit or deny Complainant's allegations and therefore, denies the allegations contained in Paragraph 16.
- 17. In response to Paragraph 17 of Complainant's Complaint, Respondent has insufficient information to admit or deny Complainant's allegations and therefore, denies the allegations contained in Paragraph 17.
- 18. In response to Paragraph 18 of Complainant's Complaint, the Respondent admits Complainant's allegations contained in Paragraph 18.
- 19. In response to Paragraph 19 of Complainant's Complaint, Respondent has insufficient information to admit or deny Complainant's allegations and therefore, denies the allegations contained in Paragraph 19.
- 20. In response to Paragraph 20 of Complainant's Complaint, the Respondent admits Complainant's allegations contained in Paragraph 20.

- 21. In response to Paragraph 21 of Complainant's Complaint, Respondent has insufficient information to admit or deny Complainant's allegations and therefore, denies the allegations contained in Paragraph 21.
- 22. Respondent denies all allegations in Complainant's Complaint not specifically admitted herein.

WHEREFORE, having answered Complainant's Complaint the Respondent requests a hearing on this matter and such other and further relief as the Respondent may be entitled to under law or in equity.

Respectfully submitted,

SHUGHART THOMSON & KILROY, P.C.

By:

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ATTORNEYS FOR RESPONDENT

Certificate of Service

I hereby certify that a copy of the above and foregoing Answer was, on the 15th day, 2004 faxed and deposited in the United States mail, postage prepaid, and properly addressed to:

Bruce H. Bates, Esq. Associate General Counsel Missouri Public Service Commission P. O. Box 360

Jefferson City, Missouri 65102

Richard E. Lenza