- **F**

c

LAW OFFICES OF

A PROFESSIONAL CORPORATION 1125 GRAND BOULEVARD SUITE 1506 KANSAS CITY, MISSOURI 64106 TELEPHONE (816) 474-5340 FACSIMILE (816) 474-5343 E-MAIL: sandspc@swbell.net

MAURICE B. SOLTZ

2

March 17, 2004

RICHARD W. SHANKLAND

MAR 1 9 2004

Secretary of The Public Service Commission P.O. Box 360 Jefferson City MO 65102-0360

Missouri Public Service Commasion

Re: The Staff of the Missouri Public Service Commission v. S.T. Ventures, L.L.C. Case No. SC-2004-0341

Ladies and Gentlemen:

Enclosed herewith is an original and one copy of an Application to File Answer to Complaint Out of Time and an original and one copy of an Answer to the Complaint in the above-captioned action. Please file the original documents and return a copy of each to me with a stamp or other acknowledgment that it has been received by you.

Thank you for your attention to this matter.

Very truly yours,

Richard W. Shankland

RWS:ksa

CC: Gary Verhaeghe S.T. Ventures, L.L.C.

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)

))

>))

>))

The Staff of the Missouri Public Service Commission,

v.

Complainant, S.T. Ventures, L.L.C.,

Respondent.

Case No. SC-2004-0341

FILED⁵

Missouri Public rvice Commission

FEB 1 9 2004

ANSWER TO COMPLAINT

COMES NOW Respondent, S.T. Ventures, L.L.C., and for its Answer to the Complaint of the Staff of the Missouri Public Service Commission filed in the above-captioned action, it states as follows:

1. It admits the allegations contained in paragraph 1 of the Complaint, except that Respondent did advise the Commission's staff of the change of its mailing address from 113 Pickett Ridge, Kirbyville, Missouri 65679 to its present mailing address, 9240 West 167th Street. Stillwell KS 66085, in the calendar year 2001.

2. It admits the remaining general allegations contained in paragraphs 2, 3 and 4 of the Complaint.

3. It admits the allegations contained in paragraphs 5 and 6 of Count One of the Complaint.

4. That it is without information or knowledge sufficient to form a belief as to the allegations contained in paragraph 7 of Count One of the Complaint.

5. It admits that it had not filed a 2002 Annual Report as of the date of the Affidavit of Janice Fisher and the filing of the Complaint, as alleged in paragraph 8 of the Complaint, but

states that said 2002 Annual Report has been filed immediately after receipt of the Complaint.

6. It admits the allegations contained in paragraph 9 of Count One of the Complaint.

7. That Respondent did not receive a form for the Annual Report covering the calendar year 2002 from the Commission.

8. That immediately upon learning of the omission, Respondent has filed its Annual Report for 2002.

9. Further, the Respondent has again advised the Commission of its present mailing address and is changing its registered agent and registered office with the Corporation Division of the Missouri Secretary of State's Office.

WHEREFORE, Respondent S.T. Ventures, L.L.C. prays the Complaint in this action be dismissed.

SOLTZ & SHANKLAND APC

ł

0

Richard W. Shankland Missouri Bar No. 26065 1125 Grand Avenue Suite 1506 Kansas City MO 64106 (816) 474-5340 FAX (816) 474-5343

Attorney for Respondent

CERTIFICATE OF MAILING

I hereby certify that a copy of the above and foregoing Answer to Complaint was mailed this $\sqrt{8^{+}}$ day of March, 2004, postage prepaid, to:

Bruce H. Bates Associate General Counsel Attorney for the Staff of the Missouri Public Service Commission P.O. Box 360 Jefferson City MO 65102

John Coffman Esq. Office of the Public Counsel P.O. Box 7800 Jefferson City MO 65102

in "

Richard W. Shankland