BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

The Manager of the Manufactured Homes and Modular Units Program of the Missouri Public Service Commission,)))
Complainant,)
V.) Case No. MC-2025-0133
Russel V. Hanson, d/b/a Countryside Modular Homes, LLC. 4469 Highway 33 Maysville, MO 64469,))))
Respondent)

STAFF NOTICE OF FILING REDACTED PLEADING

COMES NOW, the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and moves for an Order of the Commission pursuant to 20 CSR 4240-2.070(10) that Respondent Russel V. Hanson, d/b/a Countryside Modular Homes, LLC, failed to file an answer or otherwise comply with 20 CSR 4240-2.070, and, that therefore, the facts pleaded in the Staff's Complaint are deemed admitted, and in support, states as follows:

- 1. The Staff filed a *Complaint* against Respondent in the above-captioned cause alleging the improper setting up and installation of new manufactured home units in Missouri in violation of Missouri statutes and Commission rules and regulations against Respondent on October 10, 2024, pursuant to §§ 386.390.1, and 700.115.2, RSMo.
- 2. On October 11, 2024, the Commission ordered Respondent to file an answer to the Complaint or an agreement to participate in mediation no later than November 12, 2024." Respondent failed to do so, and on December 19, 2024,

the Commission entered an *Order of Default* against Respondent, effective January 18, 2025.¹

- 3. The original filing of the Complaint was filed as a "public" copy and a "confidential" copy. The public copy was blank, as no part of it was made available to the public. The Staff is now filing a new "public" version of the Complaint with the Commission which is redacted in part, rather than completely redacted. Only the personally identifiable information has been redacted in this version of the "public" copy of the Complaint being filed with this pleading.
- 4. This filing is being done for the convenience of the commission and the public.

WHEREFORE, Staff files this pleading and a copy of its original Complaint in redacted form for the Commission's information only.

Respectfully submitted,

/s/ Carolyn H. Kerr

Missouri Bar Number 45718
Senior Staff Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-751-5397 (Voice)
573-526-6969 (Fax)
Carolyn.kerr@psc.mo.gov

Attorney for Staff of the Missouri Public Service Commission

¹ Order of Default, Manager of the Manufactured Homes & Modular Units Program of the Missouri PSC v. Hanson, d/b/a Countryside Modular Homes, LLC, File No. MC-2025-0133, eff. Jan. 18, 2025.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 27th day of May, 2025, to all parties and counsel of record.

/s/ Carolyn H. Kerr