

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Director of the Manufactured Housing
and Modular Units Program of the Public
Service Commission,

Complainant,

vs.

Burkhart Mobile Homes, Inc.,

Respondent.

Case No: MC-2011-0319

ANSWER

COMES NOW Respondent Burkhart Mobile Homes, Inc. and for its Answers and Responses to the Complaint hereby states:

INTRODUCTION

1. Respondent admits that the Complaint concerns the alleged violations of certain commission rules and Missouri Statutes, but denies each and every other allegation of paragraph 1.

COMPLAINT

2. Respondent admits the allegations of paragraph 2.

RESPONDENT

3. Respondent admits the allegations of paragraph 3.

4. Respondent admits the allegations of paragraph 4.

JURISDICTION

5. Respondent admits the allegations of paragraph 5.

6. Respondent admits the allegations of paragraph 6.

FACTS COMMON TO ALL COUNTS

7. Respondent admits the allegations of paragraph 7.
8. Respondent admits the allegations of paragraph 8, and each and every subparagraph thereof.
9. Respondent admits the allegations of paragraph 9.
10. Respondent admits the allegations of paragraph 10.
11. Respondent denies the allegations of paragraph 11.
12. Respondent denies the allegations of paragraph 12.
13. Respondent denies the allegations of paragraph 13.
14. Respondent denies the allegations of paragraph 14.
15. Respondent denies the allegations of paragraph 15.
16. Respondent denies the allegations of paragraph 16.
17. Respondent denies the allegations of paragraph 17.

COUNT I

700.045(1) MISDEMEANOR SALE WITHOUT REGISTRATION

18. Respondent denies the allegations of paragraph 18.
19. Respondent denies the allegations of paragraph 19.
20. Respondent denies the allegations of paragraph 20.
21. Respondent denies the allegations of paragraph 21.
22. Respondent denies the allegations of paragraph 22.

COUNT II

REGISTRATION AND RENEWAL – REFUSAL TO RENEW 700.100.3(3) AND (4)

23. Respondent denies the allegations of paragraph 23.
24. Respondent denies the allegations of paragraph 24.

25. Respondent denies the allegations of paragraph 25.

26. Respondent denies the allegations of paragraph 26.

COUNT III
AUTHORITY TO SEEK PENALTIES

27. Respondent denies the allegations of paragraph 27.

28. Respondent denies the allegations of paragraph 28.

29. Respondent denies the allegations of paragraph 29.

WHEREFORE, having fully answered the Director of the Manufactured Housing and Modular Units Program of the Public Service Commission's Complaint, Respondent Burkhart Mobile Homes, Inc. requests the Complaint be dismissed.

Respectfully submitted,



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ATTORNEYS FOR RESPONDENT
BURKHART MOBILE HOMES, INC.

CERTIFICATE OF SERVICE

17 A copy of the foregoing was filed electronically through EFIS and mailed this day of May, 2011 to: Meghan E. McClowry, Attorney for the Staff of the Missouri Public Service Commission, P.O. Box 360, Jefferson City, MO 65102.


