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GOODSON AND MANLEY, PLC
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ARIZONA CORPORATION COMMISSION
DOCUMENT CONTROL

BEFORE THE ARIZONA CORPORATION COMMISSION

- MARC SPITZER
Chairman
- JIM IRVIN
Commissioner
- WILLIAM A. MUNDELL
Commissioner
- JEFF HATCH-MILLER
Commissioner
- MIKE GLEASON
Commissioner

Arizona Corporation Commission
DOCKETED

OCT 29 2004

DOCKETED BY	<i>CH</i>
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In the Matter of:)
)
TIERRA GROUP,)
)
PRESERVATION TRUST)
CORPORATION,)
)
PARTNERSHIP PRESERVATION)
TRUST,)
)
CATERPILLAR FOUNDATION)
PROPERTIES,)
)
RENE L. COUCH,)
)
TERRY COUCH,)
)
Respondents.)

Docket No. S-03437A-03-0000

ANSWER

Defendant, RENE L. COUCH, in answer to the Notice of Opportunity for Hearing

Regarding Proposed Order to Cease and Desist, Order for Restitution, Order for

Administrative Penalties, and for other Affirmative Action ("Complaint"), filed on

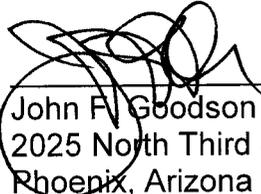
1 February 3, 2003, admits, denies, and alleges as follows:

2 1. Defendant admits the allegations contained in Paragraphs 1 through 9 of the
3 Complaint.

4 2. Defendant lacks sufficient information or belief to admit or deny the allegations
5 contained in Paragraphs 10 through 63 of the Complaint and denies those allegations
6 on that ground.

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8 Dated this 27th day of October, 2004.

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10 GOODSON AND MANLEY, PLC

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16 John F. Goodson (S.B.A. #01279)
17 2025 North Third Street, Suite 200
18 Phoenix, Arizona 85004
19 Attorneys for Respondent Rene Couch
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22 ORIGINAL and THIRTEEN COPIES of the foregoing were filed this 27th day of
23 October, 2004 with:

24
25 DOCKET CONTROL
26 Arizona Corporation Commission
27 1200 West Washington
28 Phoenix, Arizona 85007
29

30 COPY of the foregoing mailed this 27th day of October, 2004 to:

31
32 ALJ Marc Stern
33 Ariz. Corp. Comm'n/Hearing Division
34 1200 West Washington
35 Phoenix, Arizona 85007
36

37 Respondent Terry G. Couch
38 9821 East Mirasol Circle, #2191
39 Scottsdale, Arizona 85260

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John F. Goodson