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**RONAN & FIRESTONE, P.C.**  
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*Attorneys for Respondents*

AZ CORP COMMISSION  
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OCT 28 P 4: 39

Arizona Corporation Commission  
**DOCKETED**

OCT 28 2004

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**BEFORE THE ARIZONA CORPORATION COMMISSION**

In the Matter of:

MEE DIAMOND & JEWELRY, INC., an  
Arizona corporation  
2550 E. Denton Lane  
Phoenix, AZ 85016

CHRISTOPHER S. MEE, an unmarried man  
2550 E. Denton Lane  
Phoenix, AZ 85016

Respondents.

Docket No. S-03556A-04-0000

**RESPONSE AND ANSWER  
TO COMMISSION'S PROPOSED  
ORDER TO CEASE AND DESIST,  
ORDER FOR RESTITUTION, AND  
OTHER REQUESTED RELIEF**

Mee Diamond & Jewelry, Inc. and Christopher S. Mee ("Mr. Mee")(collectively herein as "Mee Diamond") answer, respond, admit and deny the following allegations pursuant to this tribunal's Third Procedural Order dated October 6, 2004 as follows:

1. Mee Diamond admits the allegations contained in paragraphs 1, 3, 4, 5 and 19.
2. Mee Diamond denies the allegations contained in paragraphs 7, 20, 23, 24, 25, 30, 31, 32 and 34.
3. In regard to paragraphs 6, 22, 26, 29 and 33, Mee Diamond incorporates all of its responses, denials and answers in the corresponding paragraphs by this reference.
4. In regard to paragraph 2, Mee Diamond admits that Mr. Mee had a separate business from the current corporation and that Mee Diamond & Jewelry, Inc. is a valid Arizona corporation, but denies the remaining allegations contained in this paragraph.
5. In regard to paragraph 8, Mee Diamond admits that Christopher Mee was president, chief financial officer and control person at various times for Mee Diamond, but denies the remaining allegations contained in this paragraph.



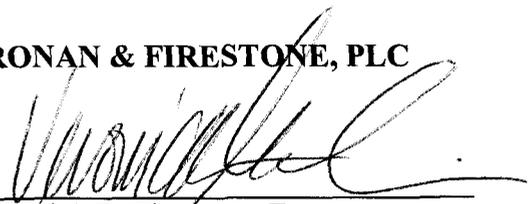
1 13. Mee Diamond alleges such other affirmative defenses including, but not limited to,  
2 promissory estoppel. Any other matters constituting an avoidance or are an affirmative defense  
3 pursuant to the Arizona Rules of Civil Procedure or applicable Arizona law as may be alleged as  
4 discovery proceeds.  
5

6 WHEREFORE, Mee Diamond having fully answered and replied to the Petition, requests  
7 the following relief:

- 8 A. That this tribunal dismiss the Petition in its entirety with prejudice and that the  
9 Petitioner take nothing thereby;
- 10 B. That this tribunal award Mee Diamond its attorneys' fees and costs incurred in  
11 defending this Petition; and
- 12 C. That this tribunal award such other relief as it deems just and proper.

13 Dated this 28<sup>th</sup> day of October, 2004.

14 **RONAN & FIRESTONE, PLC**

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16 \_\_\_\_\_  
17 Merrick B. Firestone, Esq.  
18 Veronica L. Manolio, Esq.  
19 649 North Second Avenue  
20 Phoenix, Arizona 85003  
21 *Attorneys for Respondents*

22 **Original** and 13 copies filed  
23 this 28<sup>th</sup> day of October, 2004, to:

24 Docket Control  
25 Arizona Corporation Commission  
26 1200 W. Washington  
Phoenix, AZ 85007

By:   
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