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AZ CORP COMMISSION  
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COMMISSIONERS

8 JEFF HATCH-MILLER, Chairman  
 9 WILLIAM A. MUNDELL  
 10 MARC SPITZER  
 11 MIKE GLEASON  
 12 KRISTIN K. MAYES

13 LORI LEE SPRANGER (a/k/a LORI MORIARTY )  
 14 and/or LORI LEE LEVANDOWSKI and/or LORI )  
 15 GESSELL), a married person, individually and )  
 16 Doing business as VECTOR 90 DEBT )  
 17 PURCHASING, and Arizona registered trade )  
 18 name 3127 West Honor Court )  
 19 Anthem, Arizona 85086 )

20 MARTIN OTTO SPRANGER (a/k/a MARTIN )  
 21 OTTO SPRANGER, III), spouse of LORI LEE )  
 22 SPRANGER 1650 S. Arizona Avenue #293 )  
 23 Chandler, Arizona 85248 )

24 MICHAEL ("MIKE") MORIARTY and JANE )  
 25 DOE MORIARTY, individually and doing )  
 26 business as VECTOR 90 DEBT PURCHASING, )  
 27 an Arizona Registered trade name )  
 28 3127 West Honor Court )  
 Anthem, Arizona 85086 )

Respondents.

Docket No. S-20441A-06-0082

**ANSWER IN RESPONSE  
TO TEMPORARY ORDER  
TO CEASE AND DESIST  
ON BEHALF OF MICHAEL  
MORIARTY**

1 Respondent Michael Moriarty, by and through his undersigned counsel, herein requests a  
2 hearing in the above reference matter. Respondent Michael Moriarty responds to the allegations of  
3 the Temporary Order to Cease and Desist as follows:  
4

5 1. Answering paragraph one, Respondent Michael Moriarty admits that the Commission  
6 has jurisdiction over securities related matters.

7 2. Answering paragraph two, Respondent Michael Moriarty admits said paragraph.

8 3. Answering paragraph three, Martin Spranger has no involvement in any of the activities  
9 of Respondent Lori Spranger, including the business that is the subject of the Commission's  
10 Temporary Cease and Desist Order.  
11

12 4. Answering paragraph four, Respondent Michael Moriarty denies said paragraph.

13 5. Answering paragraph five, Respondent Michael Moriarty admits that he resides at 3127  
14 West Honor Court, Anthem, Arizona 85086.

15 6. Answering paragraph six, Respondent Michael Moriarty denies said paragraph.

16 7. Answering paragraph seven, Respondent Michael Moriarty denies said paragraph.  
17

18 8. Answering paragraph eight, Respondent Michael Moriarty admits that he and Lori  
19 Spranger have used "Vector 90" as a business name, but denies that Martin Spranger had any  
20 involvement or interest in Vector 90.

21 9. Answering paragraph nine, Respondent Michael Moriarty denies that the "Respondent  
22 Spouses" as that term is defined in the Temporary Order to Cease and Desist has any interest in  
23 Vector 90 or was ever involved with it.  
24

25 10. Answering paragraph ten, Respondent Michael Moriarty admits that he and Lori  
26 Spranger had offered for sale certain debt packages through an internet website. However, he did  
27  
28

1 not believe them to be "securities" or that he was otherwise violating any state law by their offer.  
2 Moreover, he denies that they were securities. However, upon receiving the Temporary Order to  
3 Cease and Desist, he and Lori Spranger have immediately discontinued the offer of these debt  
4 packages and agrees to not do anything prohibited by law or by directive of the Commission.  
5

6 11. Answering paragraph eleven, Respondent Michael Moriarty admits that the business  
7 was involved in the purchase of consumer and commercial debt. However, he denies that they  
8 purchased faxes.

9 12. Answering paragraph twelve, Michael Moriarty alleges, on information and belief, that  
10 Lori Spranger has been working in the collection business for a decade.  
11

12 13. Answering paragraph thirteen, Respondent Michael Moriarty admits that before ceasing  
13 the web site, the web site did offer a purchase of units of debt for \$2,500, and that purchasers could  
14 continue to roll over collection proceeds to purchases of further debt packages.

15 14. Answering paragraph fourteen, Respondent Michael Moriarty admits that account  
16 numbers were assigned to debt package purchasers.  
17

18 15. Answering paragraph fifteen, Respondent Michael Moriarty admits that purchasers of  
19 the debt packages were promised a 35% return on their debt packages.

20 16. Answering paragraph sixteen, Respondent Michael Moriarty admits that the company  
21 utilized a Request for Participation form and a Participation Agreement. However, the web site has  
22 been taken down pursuant to the Temporary Order to Cease and Desist.  
23

24 17. Answering paragraph seventeen, Respondent admits that "Vector 90" is merely a d/b/a  
25 for the business, and that Vector 90 has not been incorporated.  
26  
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1           18. Answering paragraph eighteen, Respondent admits that the company had two types of  
2 offerings, and that such representations were made on the Vector 90 website before it was taken  
3 down.  
4

5           19. Answering paragraph nineteen, Respondent Michael Moriarty admits that the web site  
6 informed readers that it was not a collection agency and made the other disclosures described in said  
7 paragraph. Respondent further admits that Encompass West is an Arizona limited liability  
8 company.  
9

10           20. Answering paragraph twenty, Respondent alleges that there is nothing on the  
11 Encompass West web site and has not been for a number of months. Further, Encompass West  
12 never was or acted as a collection agency.  
13

14           21. Answering paragraph twenty one, Respondent admits the allegations concerning the  
15 agency, but denies the allegations concerning an attorney.  
16

17           22. Answering paragraph twenty two, Respondent admits, on information and belief, that  
18 Lori Spranger and her former husband, Martin Spranger, filed for bankruptcy under Chapter 7 in  
19 November of 2003.  
20

21           23. Answering paragraph twenty three, Respondent Michael Moriarty admits, on  
22 information and belief, that a Judgment was entered against Lori Spranger by default.  
23

24           24. Answering paragraph twenty four, Respondent Michael Moriarty admits that the debt  
25 packages have been offered to more than one Arizona resident via electronic mail.  
26

27           25. Answering paragraph twenty five, Respondent Michael Moriarty denies said paragraph  
28 and denies any intentional violation of law.

1           26. Answering paragraph twenty six, Respondent Michael Moriarty denies said paragraph  
2 and denies any intentional violation of law.

3           27. Answering paragraph twenty seven, Respondent Michael Moriarty denies said paragraph  
4 and denies any intentional violation of law.

5           28. Answering paragraph twenty eight, Respondent Michael Moriarty denies said paragraph  
6 and denies any intentional violation of law.

7           29. Answering paragraph twenty nine, Respondent Michael Moriarty denies said paragraph  
8 and denies any intentional violation of law.

9           30. Answering paragraph thirty, Respondent Michael Moriarty alleges that the Encompass  
10 West relationship was disclosed and that they never said they were a collection agency.  
11

12           31. Respondent Michael Moriarty denies each and every allegation of the Temporary Order  
13 to Cease and Desist not expressly admitted herein.  
14

15           WHEREFORE, Respondent Michael Moriarty respectfully request that the Temporary Order  
16 to Cease and Desist be vacated, and that no further action be taken as against him. Respondent  
17 Michael Moriarty further represents that it is his intention to henceforth avoid any actions and  
18 refrain from any conduct that would constitute a violation of the Arizona Securities Act, A.R.S.  
19 §44-1801, *et seq.*, or any administrative regulations or orders promulgated thereunder.  
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DATED this 5th day of April, 2006.

MITCHELL & FOREST  
A Professional Corporation

By 

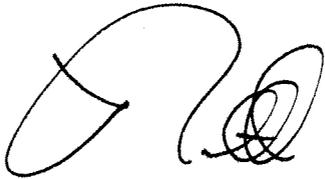
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Phoenix, Arizona 85004  
Counsel for Respondent Michael Moriarty

1 ORIGINAL AND THIRTEEN  
2 COPIES FILED by overnight mail  
3 this 5th day of April, 2006 with the:

4 Arizona Corporation Commission  
5 Attn.: Docket Control  
6 1200 West Washington  
7 Phoenix, Arizona 85007

8 COPY mailed this 5th day of April, 2006 to:

9 Julie Coleman, Esq.  
10 Arizona Corporation Commission  
11 Securities Division  
12 1300 West Washington  
13 Phoenix, Arizona 85007



14 Michael moriarty-answer to temporary order to cease and assist.doc

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