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ARIZONA CORPORATION COMMISSION
DOCUMENT CONTROL

Attorneys for Respondent SHAKMAN

BEFORE THE ARIZONA CORPORATION COMMISSION

In the Matter of:)	Docket No.
)	S-03184A-03-0000
ROBERT SHAKMAN and)	
HEALTHCARE PURCHASING)	RESPONSE OF
ALLIANCE)	ROBERT SHAKMAN
Defendant.)	
)	
)	

Respondent SHAKMAN, through counsel, and for his Response to the Commission's Proposed Order to Cease and Desist Order, Restitution and Administrative Penalties (hereinafter referred to as the "Complaint"), admits, denies and alleges as follows:

I.

SHAKMAN admits the allegations contained in paragraphs 1, 2, 3, and 11 of the Complaint.

II.

SHAKMAN denies the allegations contained in paragraphs 4 - 7, 12, 19, 21 - 24 of the Complaint.

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Arizona Corporation Commission

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III.

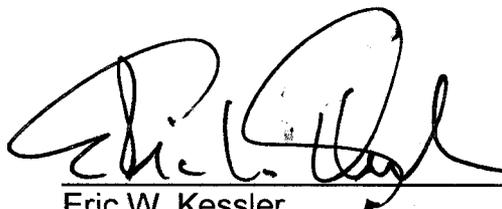
SHAKMAN is without sufficient information to form a belief as to the accuracy of the allegations contained in all remaining paragraphs of the Complaint and therefore denies the same.

IV.

SHAKMAN alleges that the Complaint is barred by the doctrine of estoppel, as well as laches and applicable statutes of limitation.

WHEREFORE, SHAKMAN respectfully requests that the Complaint be denied and dismissed in its entirety, and that SHAKMAN recover his costs and attorney's fees incurred in defense of this matter.

Dated this date: 11.20.03.



Eric W. Kessler
Attorney for SHAKMAN

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A copy hereof mailed this
November 20, 2003, to:

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

Securities Division
Arizona Corporation Commission
Attention: Wendy Coy
1300 W. Washington, 3rd Floor
Phoenix, AZ 85007

By: _____