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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS:

MIKE GLEASON — Chairman

WILLIAM A. MUNDELL

JEFF HATCH

MILLER KRISTIN K. MAYES

GARY PIERCE

2008 AUG 28 P 3: 07

AZ CORP COMMISSION  
DOCKET CONTROL

In the matter of:

Docket No.: S-20600A-08-0340

MARK W. BOSWORTH and LISA A. BOSWORTH, husband and wife;

RESPONDENTS VAN CAMPEN'S MOTION TO QUASH SUBPOENA

STEPHEN G. VAN CAMPEN and DIANE V. VAN CAMPEN, husband and wife;

MICHAEL J. SARGENT and PEGGY L. SARGENT, husband and wife;

ROBERT BORNHOLD and JANE DOE BORNHOLDT, husband and wife;

MARK BOSWORTH & ASSOCIATES, LLC., an Arizona limited liability company;

3 GRINGOS MEXICAN INVESTMENTS, LLC, an Arizona limited liability company,

Respondents.

Arizona Corporation Commission

DOCKETED

AUG 28 2008

DOCKETED BY *MM*

Respondents Stephen G. Van Campen and Diane V. Van Campen, by and through their undersigned counsel, move to quash the subpoena issued in this matter to Respondents directing them produce documents relating to 3 Gringos Mexican

1 Investments, LLC and Bosworth Commerical, Inc. A copy of that subpoena is  
2 attached as Exhibit 1.

3  
4 Respondent Van Campen is the subject of criminal investigations relating to  
5 the activities of 3 Gringos Mexican Investments and other business entities related  
6 to Mark Bosworth. Counsel is aware of investigations pending with the Phoenix  
7 Police Department and the Arizona Attorney General. Because of the scope of the  
8 investigation these agencies may be working together at this point in time.  
9

10 Because of these pending investigations, Respondent Van Campen asserts  
11 his rights under the Fifth Amendment to the United States Constitution and refuses  
12 to give to the government any information pursuant to the subpoena.  
13

14 RESPECTFULLY SUBMITTED this 28<sup>th</sup> day of August, 2008.

15  
16 **KEYT LAW OFFICES**

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18  
19 

20 \_\_\_\_\_  
21 Norman C. Keyt  
22 Attorney for Respondents Van Campen  
23 3001 E. Camelback Rd., Suite 130  
24 Phoenix, AZ 85016  
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26 Fax: 602.265.5964

27 Original filed with Docket Control  
28 Arizona Corporation Commission  
1200 W. Washington St.  
Phoenix, AZ 85007

1 Copies mailed/delivered to:

2  
3 Marc E. Stern, Hearing Officer  
4 Hearing Division  
5 Arizona Corporation Commission  
6 1200 W. Washington St.  
7 Phoenix, AZ 85007

8 Arizona Corporation Commission  
9 Securities Division  
10 Aaron Ludwig  
11 1300 W. Washington St., 3<sup>rd</sup> floor  
12 Phoenix, AZ 85007

13 Robert D. Mitchell  
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20 Paul J. Roshka, Jr.  
21 James M. McGuire  
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25 Attorneys for Respondents Sargent

26 Mark W. Bosworth  
27 Lisa A. Bosworth  
28 18094 N. 100<sup>th</sup> Street  
Scottsdale, AZ 85255  
Pro per respondents

**COMMISSIONERS**

MIKE GLEASON - Chairman  
WILLIAM A. MUNDELL  
JEFF HATCH-MILLER  
KRISTIN K. MAYES  
GARY PIERCE

BRIAN C. McNEIL  
EXECUTIVE DIRECTOR



MATTHEW J. NEUBERT  
DIRECTOR

SECURITIES DIVISION  
1300 West Washington, Third Floor  
Phoenix, AZ 85007  
TELEPHONE: (602) 542-4242  
FAX: (602) 594-7470  
E-MAIL: securitiesdiv@azcc.gov

**ARIZONA CORPORATION COMMISSION****Via Certified Mail, Return Receipt Requested [Personal Service]**

Steve Van Campen  
7012 W. Honeysuckle Dr.  
Peoria, AZ 85383

Re: **Mark Bosworth, et. al.**

**/File No. 7844**

Dear Mr. Van Campen:

Enclosed you will find a Subpoena Duces Tecum which requires your appearance before the Securities Division on **August 21<sup>st</sup>, 2008**. In lieu of personal appearance, you may provide the requested documents by the due date by mailing them to **Special Investigator Michael D. Brokaw**, Securities Division, Arizona Corporation Commission, 1300 West Washington Street, Third Floor, Phoenix, Arizona 85007. Testimony concerning the documents will be scheduled at a later time, if necessary.

Should you have any questions regarding this subpoena, please feel free to contact me at (602) 542-0205 or (602) 542-4242.

Very truly yours

A handwritten signature in black ink, appearing to read "Michael D. Brokaw".

Michael D. Brokaw  
Special Investigator

# SUBPOENA

## SECURITIES DIVISION

### ARIZONA CORPORATION COMMISSION

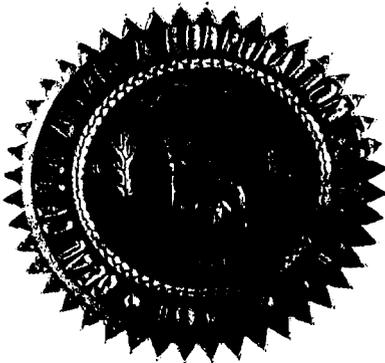
**TO Stephen Van Campen**  
**7012 W. Honeysuckle Dr.**  
**Peoria, AZ 85383**

**In the matter of**

**Mark Bosworth, et. al. file number 7844**

**involving possible violations of the Securities Act  
and/or Investment Management Act of Arizona.**

PURSUANT TO A.R.S. § 44-1823 AND A.R.S. § 44-3133, YOU ARE HEREBY REQUIRED to appear before **Special Investigator Michael D. Brokaw** of the Securities Division of the Arizona Corporation Commission at 1300 West Washington, Third Floor, Phoenix, Arizona 85007, on the **21st day of August, 2008** at 10:00 AM, to PRODUCE THE DOCUMENTS SPECIFIED IN EXHIBIT "A", which is attached and incorporated by reference.



The seal of the Arizona Corporation Commission is affixed hereto, and the undersigned, a member of said Arizona Corporation Commission, or an officer designated by it, has set her hand at Phoenix, Arizona this 28th day of July, 2008.

Julie Coleman, Chief Counsel of Enforcement  
Securities Division

Information and documents obtained by the Securities Division in the course of an investigation are confidential, unless made a matter of public record. The Securities Division may disclose the information or documents to a county attorney, the attorney general, a United States Attorney, or to law enforcement or regulatory officials to be used in any administrative, civil, or criminal proceeding. You may, in accordance with the rights guaranteed to you by the Fifth Amendment of the Constitution of the United States, refuse to give any information that might establish a direct link in a chain of evidence leading to your criminal conviction.

Persons with a disability may request a reasonable accommodation such as a sign language interpreter, as well as request this document in an alternative format, by contacting Linda Hogan, Executive Assistant to the Executive Director, voice phone number 602/542-3931, e-mail [lhogan@azcc.gov](mailto:lhogan@azcc.gov). Requests should be made as early as possible to allow time to arrange the accommodation.

Pursuant to A.R.S. § 44-1825 and A.R.S. § 44-3134, failure to comply with this subpoena may result in the application for a finding of contempt.

Pursuant to A.A.C. R14-4-304, any person required to appear at a formal interview may be represented by legal counsel.

**Exhibit "A"**

From the period beginning January 1, 2005 to the present, all documents (including, but not limited to, records, contracts, agreements, written lists, books, correspondence, e-mails, any and all papers, etc.), whether stored on electronic media or otherwise, in your personal possession or that you are reasonably able to obtain, incident or relating to:

- a. 3 Gringos Mexican Investments, LLC
- b. Bosworth Commercial, Inc.