

ORIGINAL

REHEARING 1/20/2009



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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

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

Arizona Corporation Commission
DOCKETED

DEC 30 2008

DOCKETED BY

In the matter of:

Docket No. S-20482A-06-0631

EDWARD A. PURVIS and MAUREEN H. PURVIS, husband and wife
1231 W. Shannon
Chandler, Arizona 85224

RESPONDENTS EDWARD AND MAUREEN PURVIS' REQUEST FOR RE-HEARING

GREGG L. WOLFE and ALLISON A. WOLFE, husband and wife
2092 W. Dublin Lane
Chandler, Arizona 85224

NAKAMI CHI GROUP MINISTRIES INTERNATIONAL, (a/k/a NCGMI), a Nevada corporation sole
4400 N. Scottsdale Road, Suite 9-231
Scottsdale, Arizona 85251

JAMES W. KEATON, Jr. and JENNIFER KEATON, husband and wife
11398 E. Whitehorn Drive, Apt. D
Scottsdale, Arizona 85255

ACI HOLDINGS, INC., a Nevada corporation
17650 N. 25th Avenue
Phoenix, Arizona 85023

Respondents.

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AZ CORP COMMISSION
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Pursuant to Arizona Administrative Code R14-3-112, Respondents Edward and Maureen Purvis hereby move the Commission for a re-hearing and reconsideration of the Order entered against them in this matter: The basis of this request includes, but is not limited to:

1. Respondents did not receive a fair hearing, and there was improper and prejudicial surprise and deprivation of due process against Respondents. As set forth in

1 the record in this matter, there were multiple irregularities in the pre-hearing and hearing
2 phase, including but not limited to, preclusion of Respondents with respect to obtaining
3 evidence and other discovery for their defense, claims and theories asserted against
4 Respondents which were not set forth in the pleadings, and evidence which was used
5 against them which was not disclosed, or which had been previously stipulated not to be
6 used in the hearing.

7 2. There were multiple errors with respect the admission and rejection of
8 evidence and the rulings on law made by the Commission in this matter. All objections
9 made in this matter are incorporated herein by reference. Indeed, the Order completely
10 ignored, and failed to address, all of the defenses set forth by Respondents. The Order is
11 not justified by the evidence and is contrary to law.

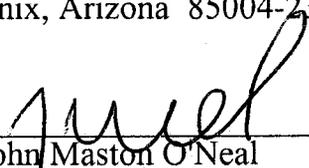
12 3. The penalties imposed upon Respondents are excessive. The restitution
13 figure has no legitimate basis in the evidence, and does not reflect an amount proven to
14 have resulted from violations of the securities act by Respondents.

15 4. All objections, defenses, and arguments advanced by Respondents in this
16 matter are incorporated by reference and reasserted herein as a basis for re-hearing and
17 reconsideration.

18 By making this request, Respondents in no way limit or otherwise waive any
19 defenses or rights on appeal that they may have, and expressly preserve and re-assert all
20 rights they may have to challenge the Order on appeal.

21 RESPECTFULLY SUBMITTED this 30th day of December, 2008.

22 QUARLES & BRADY LLP
23 Renaissance One, Two North Central Avenue
24 Phoenix, Arizona 85004-2391

25 By 
26 John Maston O'Neal
Attorneys for Respondents
Edward A. Purvis and Maureen H. Purvis

1 **ORIGINAL and 13 COPIES** filed by hand-
2 delivery this 30th day of December, 2008, with:

3 Docket Control, Arizona Corporation Commission
4 1200 West Washington
5 Phoenix, AZ 85007

6 **COPY** hand-delivered this 30th day of
7 December, 2008, to:

8 ALJ Marc Stern
9 Arizona Corporation Commission/Hearing Division
10 1200 West Washington
11 Phoenix, AZ 85007

12 Matthew Neubert, Securities Division
13 Arizona Corporation Commission
14 1200 West Washington
15 Phoenix, AZ 85007

16 **COPY** of the foregoing mailed this 30th day
17 of December, 2008, to:

18 Rachel Strachan, Securities Division
19 Arizona Corporation Commission
20 1300 West Washington St., 3rd Floor
21 Phoenix, Arizona 85007-2996

22 *Frances Inliler*
23 _____
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