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BEFORE THE ARIZONA CORPORATION COMMISSION

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MARC SPITZER
Chairman
JIM IRVIN
Commissioner
WILLIAM A. MUNDELL
Commissioner
JEFF MATCH-MILLER
Commissioner
MIKE GLEASON
Commissioner

2003 FEB -4 A 8: 01
AZ CORP COMMISSION
DOCUMENT CONTROL

Arizona Corporation Commission
DOCKETED
FEB - 4 2003

DOCKETED BY *CAR*

In the matter of:

VICTOR MONROE STOCKBRIDGE
[CRD # 1233627] and G. IRENE
STOCKBRIDGE (husband and wife)

61 Rufous Lane
Sedona, Arizona 86336-7177

Respondents.

DOCKET NO. S-03465A-02-0000

**RESPONDENTS' FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS**

Pursuant to the Rules of Practice before the Arizona Corporation Commission and Rule 34 of the Arizona Rules of Civil Procedure, Respondents Victor Monroe Stockbridge and G. Irene Stockbridge ("the Respondents") request that the documents or things designated in the attached list be produced for inspection and copying.

Except as provided otherwise in the attached list, the time and place of production are:

Time: Twenty (20) calendar days from the date of service of this Request.

Place: Roshka Heyman & DeWulf, One Arizona Center, 400 East Van Buren Street, Suite 800, Phoenix, Arizona 85004.

The attached list sets forth the items to be produced, either by individual item or by category; describes each item and category with reasonable particularity; and specifies the reasonable time, place and manner of making the production and performing the related acts in connection with each item.

ROSHKA HEYMAN & DEWULF, PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

1 The party upon whom this Request is served shall satisfy or object to it in writing within
2 twenty (20) days from the date of service of this Request.

3 The Response shall state, with respect to each item or category, that the documents will be
4 produced and related activities will be permitted as requested, unless the Request is objected to, in
5 which event the reasons for objection shall be stated.

6 The documents or things sought by this Request include documents, information and things
7 in the possession, custody or control of the Securities Division, their attorneys and all present and
8 former agents, servants, representatives, investigators and others who may have obtained custody
9 of the documents and things on behalf of the party or their attorneys.
10

11 Unless otherwise indicated, this Request covers the time frame of January 1, 1996 to the
12 present.

13 DEFINITIONS

14 For the purposes of this Request for Production of Documents, the following terms and
15 references have been abbreviated and defined as follows:
16

17 1. The terms "and" and "or" shall be construed conjunctively or disjunctively,
18 whichever makes the document request more inclusive.

19 2. The term "Securities Division" shall mean the Securities Division of the Arizona
20 Corporation Commission.

21 3. The term "Respondents" shall mean Victor Monroe Stockbridge and G. Irene
22 Stockbridge.
23

24 4. The term "Notice" is intended to include the Notice of Opportunity for Hearing for
25 Docket Number S-03465A-02-0000.
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5. The terms "document" or "documents" include, without limiting their generality, all contracts, agreements, correspondence, letters, files, memoranda, messages, handwritten notes, e-mail, inter- or intra-departmental or office or firm communications, telephone logs, telephone messages, computer disks, hard drives, telegrams, newsletters or other publications, stock certificates, stock options, promissory notes, appraisal reports, expressions of opinion as to value or use of real or personal property, valuation estimates of any kind, financial data, pro formas, estimates, financial projections, statements, credit and loan applications, accounting records and worksheets, financial statements, diaries, calendars, logs, desk diaries, appointment books, feasibility studies, recordings, notes of conversations, notes of meetings, notes of conferences, notes of investigations, notes of opinions, notes of interviews, written statements, recorded or taped interviews or statements, drafts of reports, preliminary reports, final reports, studies, forecasts, prospectuses, charts, graphs, maps, drawings or other representations or depictions, telephone records, motion picture film, audio or video tape recordings, facsimile copies, computer printouts, data card programs or other input or output of data processing systems, photographs (positive print, slides or negatives), microfilm or microfiche, or other data compilations from which information can be obtained or translated through detection devices into reasonably usable form, whether originals or copies, altered or unaltered, made by any means. The terms "document" and "documents" also include all copies which are, in any manner, not identical in content to the originals. Any comment or notation appearing on any document, and not a part of the original text, is to be considered a separate "document." Any draft, or any other preliminary form of any document, is also to be considered a separate "document."

6. The term "all documents" means every document, as defined above, known to you and every document which can be located or discovered by reasonably diligent efforts.

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1 7. The terms "writing" or "written" are intended to include, but not necessarily be
2 limited to, the following: handwriting, typewriting, printing, photographing and every other means
3 of recording upon any tangible thing, any form of communication later reduced to a writing or
4 confirmed by a letter.

5 8. The term "communication" means any oral, written, electronic, graphic,
6 demonstrative, or other transfer of information, ideas, opinions or thoughts between two or more
7 individuals or entities, regardless of the medium by which such communication occurred, and shall
8 include, without limitation, written contact by such means as letters, memoranda, telegrams, telex,
9 or any documents, and oral contact by such means as face to face meetings and telephone
10 conversations.

11 9. The terms "concerns" or "concerning" include referring to, alluding to, responding
12 to, relating to, connected with, commenting on, impinging or impacting upon, in respect of, about,
13 regarding, discussing, showing, describing, affecting, mentioning, reflecting, analyzing,
14 constituting, evidencing or pertaining to.

15 10. The term "person(s)" shall mean any natural person, corporation, partnership, sole
16 proprietorship, joint venture, association, limited liability company, governmental or other public
17 entity, or any other form of organization or legal entity, and all of their officials, directors, officers,
18 employees, representatives, attorneys and agents.

19 11. The terms "meeting" and "meetings" mean any coincidence of presence of two or
20 more persons between or among whom some communication occurs, whether or not such
21 coincidence of presence was by chance or prearranged, formal or informal, or in connection with
22 some other activity.
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5. This Request for Production of Documents is deemed to be continuing. If, after producing documents and things, you obtain or become aware of any further documents, things or information responsive to this Request for Production of Documents, you are required to produce to Respondents such additional documents and things, or provide Respondents with such additional information.

6. Documents attached to each other should not be separated.

7. In lieu of producing originals or copies thereof responsive to this Request, you may, at your option, submit legible photographic or other reproductions of such documents, provided that the originals or copies from which such reproductions were made are retained by you until the final disposition of this proceeding.

8. In the event that you seek to withhold any documents, things or information on the basis that it is properly subject to some limitation on discovery, you shall supply Respondents with a list of the documents and things for which limitation of discovery is claimed, indicating:

- (a) The name of each author, writer, sender or initiator of such document or thing, if any;
- (b) The name of each recipient, addressee or party for whom such document or thing was intended, if any;
- (c) The name of the person in custody or charge or possession of each such document;
- (d) The date of each such document, if any, or an estimate thereof and so indicated as an estimate;
- (e) The general subject matter as described in each such document, or, if no such description appears, then such other description sufficient to identify said document;

1 (f) The name, business address and position of each person who has seen, or has access
2 to or knowledge of, the contents or nature of any such document; and

3 (g) The claimed grounds for limitation of discovery (e.g. "attorney-client privilege").

4 **DOCUMENTS TO BE PRODUCED**

5 1. The Securities Division's complete investigative file relating to and/or resulting in
6 the commencement of Arizona Corporation Commission Docket No. S-03465A-02-0000. This
7 should include, but not be limited to, the following:

8 a. All tapes and/or transcripts of tapes and/or memoranda and/or notes that in
9 any way memorialize communications between the Securities Division and Respondents, including
10 Examinations Under Oath, and all exhibits thereto;

11 b. All tapes and/or transcripts of tapes and/or memoranda and/or notes that in
12 any way memorialize communications between the Securities Division and any other individual
13 interviewed and/or contacted in connection with the Securities Division's investigation of
14 Respondents and relating to the allegations set forth in the Notice. This includes all complaints,
15 correspondence and Examinations Under Oath, and all exhibits thereto;

16 c. All documents in the possession or under the control of the Securities
17 Division relating to the Respondents;

18 d. All affidavits and statements provided by individuals interviewed or
19 contacted by the Securities Division relating to the allegations set forth in the Notice and/or
20 relating to the Respondents;

21 e. All correspondence regarding or referring to the Respondents;

22 f. All documents or other information provided by Stockbridge to the
23 Securities Division;

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g. All documents or other information provided by SunAmerica Securities, Inc. to the Securities Division;

h. All documents or other information provided by Smith Financial Services, Inc. and Laverne W. Smith to the Securities Division;

i. All documents or other information by PNC Bank, N.A., PNC Bank, Delaware and PNC Advisors to the Securities Division;

j. All documents or other information provided to the Securities Division by the CPA firm and the attorney referred to in Paragraph No. 18 of the Notice;

k. All documents or other confirmations provided by the Customer or her representations to the Securities Division;

l. All documents or other information provided to the Securities Division by the Customer's sister referred to in the Notice;

m. All documents or other information provided by American Foundation for Charitable Support, Inc. to the Securities Division relating to Respondents, Customer, Customer's trust, and the Customer's CPA firm and the attorney referred to in Paragraph No. 18 of the Notice;

n. All documents obtained by, provided to or created by the Securities Division in connection with its examinations of the SunAmerica Securities financial office in Sedona.

o. Customer's trust documents; and

p. All subpoenas issued by the Securities Division in connection with the investigation of Respondents in Docket Number S-03465A-02-0000, and all documents produced in response to these subpoenas.

2. Copies of all other documents obtained during the Securities Division's investigation that are not specifically referred to in requests 1(a - p) above.

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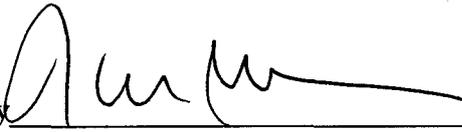
3. Copies of all documents relating to Customer and/or Customer's investments or accounts, in the possession or under the control of the Securities Division.

4. Copies of all documents prepared by any experts the Securities Division intends to call as a witness at the hearing and all drafts of those documents.

5. Copies of all documents the Securities Division intends to introduce as exhibits at the hearing.

RESPECTFULLY SUBMITTED this 4th day of February, 2003.

ROSKA HEYMAN & DeWULF, PLC

By 

Paul J. Roshka, Jr., Esq.
Dax R. Watson, Esq.
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004
Attorneys for Respondents
Victor Monroe Stockbridge and
G. Irene Stockbridge

ORIGINAL and thirteen copies of the foregoing hand-delivered this 4th day of February, 2003 to:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

COPY of the foregoing hand-delivered this 4th day of February, 2003 to:

Marc E. Stern
Hearing Officer
Hearing Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

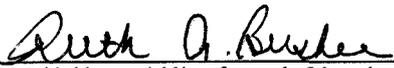
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14 1275 West Washington Street
15 Phoenix, Arizona 85007

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