

ORIGINAL



0000122074

1 Michael J. LaVelle – State Bar No. 002296
 2 Matthew K. LaVelle – State Bar No. 018828
 3 **LAVELLE & LAVELLE, PLC**
 4 2525 East Camelback Road, Suite 888
 5 Phoenix, AZ 85016
 6 MJL@LaVelle-LaVelle.com
 7 Matt@LaVelle-LaVelle.com
 8 Telephone: (602) 279-2100
 9 Facsimile: (602) 279-2114
 10 *Attorneys for Respondents Tom Hirsch, Diane Rose Hirsch,*
 11 *Berta Walder, Howard Walder, Harish P. Shah, Madhavi H. Shah and Horizon Partners, LLC*

RECEIVED

2011 JAN 18 P 4: 18

AZ CORP COMMISSION
DOCKET CONTROL

BEFORE THE ARIZONA CORPORATION COMMISSION

10 In the matter of:
 11
 12 RADICAL BUNNY, L.L.C., an Arizona
 13 limited liability company,
 14 HORIZON PARTNERS, L.L.C., an
 15 Arizona limited liability company,
 16 TOM HIRSCH (aka TOMAS N.
 17 HIRSCH)and DIANE ROSE HIRSCH,
 18 husband and wife;
 19 BERTA FRIEDMAN. WALDER (aka
 20 BUNNY WALDER, a married person,
 21 HOWARD EVAN WALDER, a
 22 married person,
 23 HARISH PANNALAL SHAH and
 24 MADHAVI H. SHAH, husband and
 25 wife,
 26 Respondents.

DOCKET NO. S-20660A-09-0107

**REPLY TO SECURITY
DIVISION'S RESPONSE ON
MOTION TO SUPPLEMENT
THE RECORD**

Arizona Corporation Commission
DOCKETED

JAN 18 2011

DOCKETED BY

27 The Security Division's only response is that the Court order referred to is
 28 the subject to appeal. It is effective if it is not stayed on appeal and in fact

1 Respondent's are advised that over \$500,000 has been paid based on the
2 effectiveness of this order. There is no reason this order should not be made a part
3 of the record before this body and in fact it would always be subject to judicial
4 notice as being an order entered in a regular scheduled Court proceeding.
5
6

7 RESPECTFULLY SUBMITTED this 18th day of January, 2011.
8

9
10 **LAVELLE & LAVELLE, PLC**

11
12 By: 
13 Michael J. LaVelle

14 2525 East Camelback Road, Suite 888
15 Phoenix, Arizona 85016

16 *Attorneys for Respondents Tom Hirsch, Diane Rose Hirsch, Berta Walder, Howard
17 Walder, Harish P. Shah, Madhavi H. Shah and Horizon Partners, LLC*

18 ORIGINAL and 13 COPIES filed this
19 18th day of January, 2011 with:

20 **ARIZONA CORPORATION COMMISSION**
21 Securities Division
22 1300 West Washington, Third Floor
23 Phoenix, Arizona 85007

24 COPY of the foregoing MAILED this
25 18th day of January, 2011 to:

26 Lyn Farmer
27 Chief Administrative Law Judge
28 **ARIZONA CORPORATION COMMISSION**
1200 West Washington
Phoenix, Arizona 85007

1 Julie Coleman
2 **ARIZONA CORPORATION COMMISSION**
3 Securities Division
4 1300 West Washington, Third Floor
5 Phoenix, Arizona 85007

6 Jordan A. Kroop
7 Thomas J. Salerno
8 **SQUIRE SANDERS & DEMPSEY, LLP**
9 Two Renaissance Square
10 40 North Central Avenue, Suite 2700
11 Phoenix, Arizona 85004-4498
12 *Attorneys for Radical Bunny*

13 
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28