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Arizona Corporation Commission

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15 Counsel for Respondent  
16 Denver Energy Exploration, LLC

17 **BEFORE THE ARIZONA CORPORATION COMMISSION**

18 In the matter of:

Docket No. S-20804A-11-0208

19 CRAIG RANDAL MUNSEY and JANE DOE  
20 MUNSEY, husband and wife,

21 MARKETING RELIABILITY CONSULTING,  
22 LLC, an Arizona limited liability company, and

23 DENVER ENERGY EXPLORATION, LLC, a  
24 Texas limited liability company,

25 Respondents.

**RESPONDENT DENVER  
ENERGY EXPLORATION, LLC'S  
ANSWER TO TEMPORARY  
ORDER TO CEASE AND DESIST  
AND NOTICE OF OPPORTUNITY  
FOR HEARING**

26 Respondent Denver Energy Exploration, LLC ("Denver Energy"), a Texas limited liability  
27 company, by and through its undersigned counsel, herein answers or otherwise responds to the  
28 allegations of the Securities Division of the Arizona Corporation Commission ("Commission") set  
forth in the May 23, 2011 Temporary Order to Cease and Desist and Notice of Opportunity for  
Hearing ("NOH"). Denver Energy herein specifically denies that it engaged in, or is about to

1 engage in, any acts or practices that would constitute violations of the ARS § 44-1801, *et seq.*, the  
2 Arizona Securities Act ("Securities Act") or that the public welfare requires immediate action.

3  
4 **I. JURISDICTION**

5 1. Answering paragraph 1 of the NOH, while Denver Energy admits that the  
6 Commission has jurisdiction over matters pursuant to Article XV of the Arizona Constitution and  
7 the Securities Act, said paragraph calls for a legal conclusion and therefore Denver Energy denies  
8 the remainder of said paragraph, including that the Commission has jurisdiction over this matter.

9  
10 **II. RESPONDENTS**

11 2. Answering paragraph 2 of the NOH, Denver Energy is without sufficient information  
12 or belief to admit or deny the allegations of said paragraph pertaining to Respondents other than  
13 Denver Energy, including Craig Randal Munsey ("Munsey") and Marketing Reliability Consulting,  
14 LLC ("MRC"), and therefore Denver Energy denies those allegations. Denver Energy admits that  
15 while Munsey's business card listed him as a "senior representative," pursuant to the parties'  
16 agreement, he was merely an independent contractor of Denver Energy. He certainly was not  
17 authorized by Denver Energy to act in an fashion on behalf of Denver Energy that was in violation  
18 of Arizona securities laws or regulations. With respect to itself, Denver Energy denies the  
19 remainder of said paragraph.

20 3. Answering paragraph 3 of the NOH, Denver Energy is without sufficient information  
21 or belief to admit or deny the allegations of said paragraph pertaining to Respondents other than  
22 Denver Energy, including Munsey and MRC, and therefore Denver Energy denies those allegations.  
23 Denver Energy denies the remainder of said paragraph, including that MRC has been offering  
24 and/or selling the unit investments within or from Arizona on behalf of Denver Energy as its  
25 authorized "marketing" agent and investment dealer.  
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1           10.     Answering paragraph 10 of the NOH, Denver Energy admits that the Units have not  
2 been registered with the Commission as securities to be offered or sold within Arizona, but alleges  
3 that the Units are not securities and even if they were securities, they were exempt or except from  
4 registration.  
5

6           11.     Answering paragraph 11 of the NOH, Denver Energy admits the existence of the  
7 website, the contents of which speak for itself, and denies any characterization of the website.  
8

9           12.     Answering paragraph 12 of the NOH, Denver Energy admits the existence of the  
10 website, the contents of which speak for itself, and denies any characterization of the website.  
11

12           13.     Answering paragraph 13 of the NOH, Denver Energy admits the existence of the  
13 website, the contents of which speak for itself, and denies any characterization of the website.  
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15           14.     Answering paragraph 14 of the NOH, Denver Energy admits the existence of the  
16 website, the contents of which speak for itself, and denies any characterization of the website.  
17

18           15.     Answering paragraph 15 of the NOH, Denver Energy is without sufficient  
19 information or belief to admit or deny the allegations of said paragraph pertaining to Respondents  
20 other than Denver Energy, and therefore Denver Energy denies said paragraph. With respect to  
21 itself, Denver Energy denies said paragraph.  
22

23           16.     Answering paragraph 16 of the NOH, Denver Energy admits the existence of the  
24 website, the contents of which speak for itself, and denies any characterization of the website.  
25

26           17.     Answering paragraph 17 of the NOH, Denver Energy admits the existence of the  
27 website, the contents of which speak for itself, and denies any characterization of the website.  
28

          18.     Answering paragraph 18 of the NOH, Denver Energy is without sufficient  
information or belief to admit or deny the allegations of said paragraph pertaining to Respondents

1 other than Denver Energy, and therefore Denver Energy denies said paragraph. With respect to  
2 itself, Denver Energy denies said paragraph.

3 19. Answering paragraph 19 of the NOH, Denver Energy is without sufficient  
4 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
5 paragraph.  
6

7 20. Answering paragraph 20 of the NOH, Denver Energy is without sufficient  
8 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
9 paragraph.

10 21. Answering paragraph 21 of the NOH, Denver Energy is without sufficient  
11 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
12 paragraph. Further, to the extent said e-mail exists, Denver Energy alleges that the contents of the  
13 e-mail speak for itself, and denies any characterization of the e-mail.  
14

15 22. Answering paragraph 22 of the NOH, Denver Energy is without sufficient  
16 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
17 paragraph. Further, to the extent said e-mail exists, Denver Energy alleges that the contents of the  
18 e-mail speak for itself, and denies any characterization of the e-mail.

19 23. Answering paragraph 23 of the NOH, Denver Energy is without sufficient  
20 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
21 paragraph. Further, to the extent said e-mail exists, Denver Energy alleges that the contents of the  
22 e-mail speak for itself, and denies any characterization of the e-mail.  
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24 24. Answering paragraph 24 of the NOH, Denver Energy is without sufficient  
25 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
26 paragraph.  
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1           25.    Answering paragraph 25 of the NOH, Denver Energy is without sufficient  
2 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
3 paragraph.

4           26.    Answering paragraph 26 of the NOH, Denver Energy is without sufficient  
5 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
6 paragraph.  
7

8           27.    Answering paragraph 27 of the NOH, Denver Energy is without sufficient  
9 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
10 paragraph.

11                   a.    Answering paragraph 27a of the NOH, Denver Energy is without sufficient  
12 information or belief to admit or deny the allegations of said paragraph, and  
13 therefore denies said paragraph.  
14

15                   b.    Answering paragraph 27b of the NOH, Denver Energy is without sufficient  
16 information or belief to admit or deny the allegations of said paragraph, and  
17 therefore denies said paragraph.

18                   c.    Answering paragraph 27c of the NOH, Denver Energy is without sufficient  
19 information or belief to admit or deny the allegations of said paragraph, and  
20 therefore denies said paragraph.  
21

22                   d.    Answering paragraph 27d of the NOH, Denver Energy is without sufficient  
23 information or belief to admit or deny the allegations of said paragraph, and  
24 therefore denies said paragraph.  
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- e. Answering paragraph 27e of the NOH, Denver Energy is without sufficient information or belief to admit or deny the allegations of said paragraph, and therefore denies said paragraph.
- f. Answering paragraph 27f of the NOH, Denver Energy is without sufficient information or belief to admit or deny the allegations of said paragraph, and therefore denies said paragraph.
- g. Answering paragraph 27g of the NOH, Denver Energy is without sufficient information or belief to admit or deny the allegations of said paragraph, and therefore denies said paragraph.
- h. Answering paragraph 27h of the NOH, Denver Energy is without sufficient information or belief to admit or deny the allegations of said paragraph, and therefore denies said paragraph.
- i. Answering paragraph 27i of the NOH, Denver Energy is without sufficient information or belief to admit or deny the allegations of said paragraph, and therefore denies said paragraph.
- j. Answering paragraph 27j of the NOH, Denver Energy is without sufficient information or belief to admit or deny the allegations of said paragraph, and therefore denies said paragraph.
- k. Answering paragraph 27k of the NOH, Denver Energy is without sufficient information or belief to admit or deny the allegations of said paragraph, and therefore denies said paragraph.

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1. Answering paragraph 271 of the NOH, Denver Energy is without sufficient information or belief to admit or deny the allegations of said paragraph, and therefore denies said paragraph.

28. Answering paragraph 28 of the NOH, Denver Energy is without sufficient information or belief to admit or deny the allegations of said paragraph, and therefore denies said paragraph.

29. Answering paragraph 29 of the NOH, Denver Energy is without sufficient information or belief to admit or deny the allegations of said paragraph, and therefore denies said paragraph. Further, to the extent said e-mails and attachments exist, Denver Energy alleges that the contents of the e-mails and attachments speak for themselves, and denies any characterization of the e-mails and attachments.

a. Answering paragraph 29a of the NOH, Denver Energy is without sufficient information or belief to admit or deny the allegations of said paragraph, and therefore denies said paragraph. Further, to the extent said private placement memorandum ("PPM") attachment exists, Denver Energy alleges that the contents of the attachment speak for itself, and denies any characterization of the attachment.

b. Answering paragraph 29b of the NOH, Denver Energy is without sufficient information or belief to admit or deny the allegations of said paragraph, and therefore denies said paragraph. Further, to the extent said presentation report attachment exists, Denver Energy alleges that the contents of the attachment speak for itself, and denies any characterization of the attachment.

1 c. Answering paragraph 29c of the NOH, Denver Energy is without sufficient  
2 information or belief to admit or deny the allegations of said paragraph, and  
3 therefore denies said paragraph. Further, to the extent said prospectus  
4 attachment exists, Denver Energy alleges that the contents of the attachment  
5 speak for itself, and denies any characterization of the attachment.  
6

7 30. Answering paragraph 30 of the NOH, Denver Energy is without sufficient  
8 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
9 paragraph.

10 31. Answering paragraph 31 of the NOH, Denver Energy is without sufficient  
11 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
12 paragraph.  
13

14 a. Answering paragraph 31a of the NOH, Denver Energy is without sufficient  
15 information or belief to admit or deny the allegations of said paragraph, and  
16 therefore denies said paragraph.

17 b. Answering paragraph 31b of the NOH, Denver Energy is without sufficient  
18 information or belief to admit or deny the allegations of said paragraph, and  
19 therefore denies said paragraph.

20 c. Answering paragraph 31c of the NOH, Denver Energy is without sufficient  
21 information or belief to admit or deny the allegations of said paragraph, and  
22 therefore denies said paragraph.  
23

24 d. Answering paragraph 31d of the NOH, Denver Energy is without sufficient  
25 information or belief to admit or deny the allegations of said paragraph, and  
26 therefore denies said paragraph.  
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1           32.    Answering paragraph 32 of the NOH, Denver Energy is without sufficient  
2 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
3 paragraph.

4           33.    Answering paragraph 33 of the NOH, Denver Energy is without sufficient  
5 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
6 paragraph. Further, to the extent said e-mails and attachments exist, Denver Energy alleges that the  
7 contents of the e-mails and attachments speak for themselves, and denies any characterization of the  
8 e-mails and attachments.  
9

10           a.     Answering paragraph 33a of the NOH, Denver Energy is without sufficient  
11 information or belief to admit or deny the allegations of said paragraph, and  
12 therefore denies said paragraph. Further, to the extent said joint venture  
13 agreement attachment exists, Denver Energy alleges that the contents of the  
14 attachment speak for itself, and denies any characterization of the attachment.  
15

16           b.     Answering paragraph 33b of the NOH, Denver Energy is without sufficient  
17 information or belief to admit or deny the allegations of said paragraph, and  
18 therefore denies said paragraph. Further, to the extent said questionnaire  
19 attachment exists, Denver Energy alleges that the contents of the attachment  
20 speak for itself, and denies any characterization of the attachment.  
21

22           c.     Answering paragraph 33c of the NOH, Denver Energy is without sufficient  
23 information or belief to admit or deny the allegations of said paragraph, and  
24 therefore denies said paragraph. Further, to the extent said joint venture  
25 agreement attachment exists, Denver Energy alleges that the contents of the  
26 attachment speak for itself, and denies any characterization of the attachment.  
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1 d. Answering paragraph 33d of the NOH, Denver Energy is without sufficient  
2 information or belief to admit or deny the allegations of said paragraph, and  
3 therefore denies said paragraph. Further, to the extent said questionnaire  
4 attachment exists, Denver Energy alleges that the contents of the attachment  
5 speak for itself, and denies any characterization of the attachment.  
6

7 34. Answering paragraph 34 of the NOH, Denver Energy is without sufficient  
8 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
9 paragraph. Further, to the extent said e-mail exists, Denver Energy alleges that the contents of the  
10 e-mail speak for itself, and denies any characterization of the e-mail.  
11

12 35. Answering paragraph 35 of the NOH, said paragraph contains no allegations of fact  
13 to which Denver Energy need respond.  
14

15 36. Answering paragraph 36 of the NOH, Denver Energy is without sufficient  
16 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
17 paragraph. Further, to the extent said e-mail exists, Denver Energy alleges that the contents of the  
18 e-mail speak for itself, and denies any characterization of the e-mail.  
19

20 37. Answering paragraph 37 of the NOH, Denver Energy is without sufficient  
21 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
22 paragraph. Further, to the extent said e-mail exists, Denver Energy alleges that the contents of the  
23 e-mail speak for itself, and denies any characterization of the e-mail.  
24

25 38. Answering paragraph 38 of the NOH, Denver Energy is without sufficient  
26 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
27 paragraph. Further, to the extent said e-mail exists, Denver Energy alleges that the contents of the  
28 e-mail speak for itself, and denies any characterization of the e-mail.

1           39.     Answering paragraph 39 of the NOH, Denver Energy is without sufficient  
2 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
3 paragraph. Further, to the extent said PPM exists, Denver Energy alleges that the contents of the  
4 PPM speak for itself, and denies any characterization of the PPM.  
5

6           40.     Answering paragraph 40 of the NOH, Denver Energy is without sufficient  
7 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
8 paragraph. Further, to the extent said PPM exists, Denver Energy alleges that the contents of the  
9 PPM speak for itself, and denies any characterization of the PPM.

10          41.     Answering paragraph 41 of the NOH, Denver Energy is without sufficient  
11 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
12 paragraph. Further, to the extent said PPM exists, Denver Energy alleges that the contents of the  
13 PPM speak for itself, and denies any characterization of the PPM.  
14

15          42.     Answering paragraph 42 of the NOH, Denver Energy is without sufficient  
16 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
17 paragraph. Further, to the extent said Unit documentation exists, Denver Energy alleges that the  
18 contents of the Unit documentation speak for itself, and denies any characterization of the Unit  
19 documentation.  
20

21          43.     Answering paragraph 43 of the NOH, Denver Energy is without sufficient  
22 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
23 paragraph.  
24

25          44.     Answering paragraph 44 of the NOH, Denver Energy is without sufficient  
26 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
27 paragraph. Further, to the extent said Unit documentation exists, Denver Energy alleges that the  
28

1 contents of the Unit documentation speak for itself, and denies any characterization of the Unit  
2 documentation. Denver Energy admits the existence of the website, the contents of which speak for  
3 itself, and denies any characterization of the website.

4 45. Answering paragraph 45 of the NOH, Denver Energy is without sufficient  
5 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
6 paragraph.  
7

8 46. Answering paragraph 46 of the NOH, Denver Energy is without sufficient  
9 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
10 paragraph. Further, to the extent said e-mail exists, Denver Energy alleges that the contents of the  
11 e-mail speak for itself, and denies any characterization of the e-mail.  
12

13 47. Answering paragraph 47 of the NOH, Denver Energy is without sufficient  
14 information or belief to admit or deny the allegations of said paragraph, and therefore denies said  
15 paragraph. Further, to the extent said questionnaires exist, Denver Energy alleges that the contents  
16 of the questionnaires speak for themselves, and denies any characterization of the questionnaires.

17 48. Answering paragraph 48 of the NOH, Denver Energy admits the existence of the  
18 Administrative Proceeding, the contents of which speak for themselves, and therefore denies any  
19 characterization of the proceedings, documents or findings therein. Further, Denver Energy is  
20 without sufficient information and belief to admit or deny the allegations regarding the alleged  
21 knowledge of the alleged Unit offerees and purchases, and therefore denies those allegations.  
22

23 49. Answering paragraph 49 of the NOH, Denver Energy admits the existence of the  
24 Summary Order to Cease and Desist, the contents of which speak for itself, and denies any  
25 characterization of the Summary Order to Cease and Desist.  
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1 other than Denver Energy, including Munsey and MRC, and therefore Denver Energy denies those  
2 allegations. Denver Energy admits that it has not been registered as a dealer or salesman pursuant to  
3 Article 9 of the Securities Act, but alleges that no such registration was required of Denver Energy.  
4 Denver Energy denies the remainder of said paragraph, including that Denver Energy offered or  
5 sold securities within or from Arizona.  
6

7 58. Answering paragraph 58 of the NOH, Denver Energy denies said paragraph.

8 **VI. VIOLATION OF A.R.S. § 44-1991**

9 **(Fraud in Connection with the Offer or Sale of Securities)**

10 59. Answering paragraph 59 of the NOH, Denver Energy is without sufficient  
11 information or belief to admit or deny the allegations of said paragraph pertaining to Respondents  
12 other than Denver Energy, including Munsey and MRC, and therefore Denver Energy denies those  
13 allegations. With respect to itself, Denver Energy denies said paragraph.  
14

15 a. Answering paragraph 59a of the NOH, Denver Energy is without sufficient  
16 information or belief to admit or deny the allegations of said paragraph, and  
17 therefore denies said paragraph.

18 b. Answering paragraph 59b of the NOH, Denver Energy is without sufficient  
19 information or belief to admit or deny the allegations of said paragraph, and  
20 therefore denies said paragraph.  
21

22 60. Answering paragraph 60 of the NOH, Denver Energy denies said paragraph.

23 61. Denver Energy expressly denies each and every allegation of this NOH not expressly  
24 admitted herein. At no time has Denver Energy intentionally violated any securities laws of the  
25 State of Arizona, nor authorized anyone else to do so on its behalf. It has been, and continues to be,  
26 Denver Energy's intentions to fully comply with the laws and regulations of the State of Arizona  
27  
28

1 and Denver Energy is committed to working with the Arizona Corporation Commission, Securities  
2 Division to address each and every one of its concerns about Denver Energy's business activities.

3 **VII. AFFIRMATIVE DEFENSES.**

4 62. Denver Energy alleges that the Commission lacks personal jurisdiction over Denver  
5 Energy.

6 63. Denver Energy alleges that the Commission lacks subject matter jurisdiction over  
7 this matter.

8 64. Denver Energy alleges that the NOH fails to state a claim upon which relief can be  
9 granted, and that this matter should be dismissed in its entirety with prejudice.

10 65. Denver Energy alleges that no securities are involved in the alleged transactions.

11 66. Denver Energy alleges that, to the extent the documents that were allegedly offered  
12 or sold are determined to be securities, Denver Energy and the Units are exempt or except from the  
13 registration provisions of the Securities Act.

14 67. Denver Energy alleges that all of its actions were taken for a proper purpose.

15 68. Denver Energy alleges that it has not taken any improper actions within or from the  
16 State of Arizona.

17 69. Denver Energy alleges that the claims in the NOH are barred by the applicable  
18 statute of limitations.

19 70. Denver Energy alleges that it did not offer or sell investments contracts, commodity  
20 investment contracts, bonds, or any securities under Arizona law.

21 71. Denver Energy alleges that the claims in the NOH are barred by the doctrines of  
22 waiver, estoppel, laches, unclean hands, and contributory negligence.

23 72. Denver Energy alleges that the claims in the NOH are barred by assumption of risk.

1           73. Denver Energy alleges that the Commission has failed to allege securities fraud with  
2 reasonable particularity as required by Rule 9(b) of the Arizona Rules of Civil Procedure.

3           74. Denver Energy alleges that it did not know, nor could they have known through the  
4 exercise of reasonable care, of any alleged untrue statements or material omissions as alleged in the  
5 NOH.  
6

7           75. Denver Energy alleges that it has not acted with the requisite scienter.

8           76. Denver Energy alleges that it has not employed a device, scheme or artifice to  
9 defraud in connection with the offer, purchase, or sale of any security.

10           77. Denver Energy alleges that the alleged investors have suffered no injuries or  
11 damages as a result of Denver Energy's acts.

12           78. Denver Energy alleges that it has not made any misrepresentations or omissions,  
13 material or otherwise.  
14

15           79. Denver Energy alleges that it has acted in good faith and did not directly or indirectly  
16 induce the conduct at issue.

17           80. Denver Energy alleges that it has caused no damages.

18           81. Denver Energy alleges that the investors relied on other culpable parties in  
19 connection with the matters at issue in this NOH.  
20

21           82. Denver Energy alleges that restitution is barred because the damages, if any, were  
22 caused by the investors' own acts or omissions and/or by the investors' failure to mitigate their  
23 damages.

24           83. Denver Energy alleges that the claims in the NOH are barred, in whole or in part,  
25 because investors' damages, if any, were caused by the acts of others over whom Denver Energy has  
26 no control, and for whose acts Denver Energy is not legally answerable.  
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1           84. Denver Energy alleges that the claims in the NOH are barred, in whole or in part,  
2 because investors' damages, if any, were caused by the intervening and superseding acts of others  
3 over whom Denver Energy has no control, and for whose acts Denver Energy is not legally  
4 answerable.

5           85. Denver Energy alleges that the claims in the NOH are barred, in whole or in part,  
6 because of mutual mistake.

7           86. Denver Energy alleges that the claims in the NOH are barred, in whole or in part,  
8 because of payment, accord, and satisfaction.

9           87. Denver Energy alleges that the claims in the NOH are precluded, in whole or in part,  
10 by offsets.

11           88. Denver Energy alleges that the claims in the NOH are barred, in whole or in part,  
12 because investors acted in bad faith.

13           89. Further investigation and discovery in this matter may reveal the existence of  
14 additional affirmative defenses. Therefore, Denver Energy reserves as possible defenses all  
15 remaining defenses set forth in the Arizona Rules of Civil Procedure.

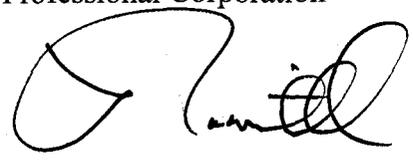
16           90. Denver Energy reserve the right to amend this Answer to assert additional  
17 affirmative defenses after completion of investigation and discovery.

18           WHEREFORE, having fully answered the NOH, there is no basis for the imposition of  
19 liability of any kind or nature, there should be no order of any kind or nature against Denver  
20 Energy, and that all requested relief should be denied and the action should be dismissed with  
21 respect to Denver Energy in its entirety. Denver Energy previously requested a hearing in this  
22 matter and reaffirms that request.  
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DATED this 22nd day of June, 2011.

MITCHELL & ASSOCIATES  
A Professional Corporation



By \_\_\_\_\_  
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Denver Energy Exploration, LLC

1 ORIGINAL of the foregoing filed on or  
2 about this 22nd day of June, 2011 with:

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

7 COPIES of the foregoing mailed  
8 on or about 22nd day of June, 2011 to:

9 Julie A. Coleman, Esq.  
10 Arizona Corporation Commission  
11 Securities Division  
12 1300 W. Washington Street, Third Floor  
13 Phoenix, Arizona 85007-2996

14 Mr. Craig R. Munsey  
15 2303 N. 44th Street, Suite 14-1071  
16 Phoenix, Arizona 85008



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denver energy/pldgs/answer to temp order