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BEFORE THE ARIZONA CORPORATION COMMISSION

2012 AUG 9 8 28 AM Arizona Corporation Commission

DOCKETED

AUG 09 2012

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COMMISSIONERS:
GARY PIERCE-CHAIRMAN
BOB STUMP
SANDRA D. KENNEDY
PAUL NEWMAN
BRENDA BURNS

In the matter of:

THOMAS LAURENCE HAMPTON,
CRD#2470192, and STEPHANIE
YAGER, husband and wife,

TIMOTHY D. MORAN, CRD#2326078,
and PATRICIA MORAN, husband wife,

PATRICK MORAN, CRD#1496354, and
KELLY MORAN, husband and wife,

HAMPTON CAPITAL MARKETS, LLC,
an Arizona limited liability company,

Respondents.

Docket No. S-20823A-11-0407

**RESPONDENTS PATRICK AND
KELLY MORAN'S ANSWER TO
AMENDED NOTICE OF
OPPORTUNITY FOR HEARING
REGARDING PROPOSED ORDER
TO CEASE AND DESIST, ORDER
FOR RESTITUTION, ORDER FOR
ADMINISTRATIVE PENALTIES,
ORDER OF REVOCATION, AND
ORDER FOR OTHER
AFFIRMATIVE ACTION**

For their Answer to the Amended Notice of Opportunity for Hearing Regarding Proposed Order to Cease and Desist, Order for Restitution, Order for Administrative Penalties, Order of Revocation, and Order for Other Affirmative Action (the "Notice") filed by the Securities Division (the "Division") of the Arizona Corporation Commission, Respondents Patrick and Kelly Moran ("Respondents") admit, deny and affirmatively allege as follows:

1. With respect to the allegations in Paragraph 1 of the Notice, Respondents admit the allegations.
2. With respect to the allegations in Paragraphs 2 through 7 of the Notice, Respondents are without information sufficient to form a belief as to the truth of the allegations.
3. With respect to the allegations in Paragraph 8 of the Notice, Respondents admit

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1 the allegations.

2 4. With respect to the allegations in Paragraphs 9 and 10 of the Notice, Respondents
3 are without information sufficient to form a belief as to the truth of the allegations.

4 5. With respect to the allegations in Paragraph 11 of the Notice, Respondents admit
5 the allegations.

6 6. With respect to the allegations in Paragraphs 12 and 13 of the Notice,
7 Respondents are without information sufficient to form a belief as to the truth of the
8 allegations.

9 7. With respect to the allegations in Paragraphs 14 and 15 of the Notice,
10 Respondents admit the allegations.

11 8. With respect to the allegations in Paragraph 16 of the Notice, Respondents deny
12 the allegations.

13 9. With respect to the allegations in Paragraphs 17 through 48 of the Notice,
14 Respondents are without information sufficient to form a belief as to the truth of the
15 allegations.

16 10. With respect to the allegations in Paragraph 49 of the Notice, Respondents deny
17 the allegations as they pertain to Respondents.

18 11. With respect to the allegations in Paragraphs 50 through 68 of the Notice,
19 Respondents are without information sufficient to form a belief as to the truth of the
20 allegations.

21 12. With respect to the allegations in Paragraph 69 of the Notice, Respondents deny
22 the allegations as they pertain to Respondents.

23 13. With respect to the allegations in Paragraphs 70 through 72 of the Notice,
24 Respondents are without information sufficient to form a belief as to the truth of the
25 allegations.

26 14. With respect to the allegations in Paragraphs 73 through 77 of the Notice,

1 Respondents deny the allegations as they pertain to Respondents.

2 15. With respect to the allegations in Paragraphs 78 through 79 of the Notice,
3 Respondents are without information sufficient to form a belief as to the truth of the
4 allegations.

5 16. With respect to the allegations in Paragraph 80 of the Notice, Respondents deny
6 the allegations.

7 17. Respondents deny each and every allegation in the Division's Notice except those
8 expressly admitted herein.

9 18. Respondents affirmatively allege that the Division's Notice fails to state a claim
10 upon which relief can be granted.

11 WHEREFORE, having fully answered the Division's Notice, Respondents request that
12 the Notice be dismissed and that the Respondents be awarded their attorneys' fees, costs and
13 expenses, and such other relief as the Court deems just and fair.

14 RESPECTFULLY SUBMITTED this 9th day of August, 2012.

15 **MAYNARD CRONIN ERICKSON**
16 **CURRAN & REITER, P.L.C.**

17 By 
18 Michael D. Curran
19 3200 N. Central Avenue
20 Suite 1800
21 Phoenix, Arizona 85012

22 **ORIGINAL** (plus 13 copies) of the foregoing
23 filed this 9th day of August, 2012, with:

24 Docket Control
25 Arizona Corporation Commission
26 1200 W. Washington
Phoenix, Arizona 85007

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1 **COPY** of the foregoing hand-delivered
this 9th day of August, 2012, to:

2 Marc E. Stern, Administrative Law Judge
3 Hearing Division
4 Arizona Corporation Commission
5 1200 W. Washington Street
6 Phoenix, Arizona 85007

7 Phong (Paul) Huynh, Esq.
8 Securities Division
9 Arizona Corporation Commission
10 1300 W. Washington Street, 3rd Floor
11 Phoenix, Arizona 85007

12 **COPY** of the foregoing mailed
13 this 9th day of August, 2012, to:

14 Thomas Hampton
15 Stephanie Yager
16 9026 E. Calle De Las Brisas
17 Scottsdale, Arizona 85255
18 Respondents

19 Paul J. Roshka, Jr., Esq.
20 Timothy J. Sabo, Esq.
21 One Arizona Center
22 400 E. Van Buren Street, Suite 800
23 Phoenix, Arizona 85004
24 Attorneys for Respondents Timothy and Patricia Moran

25 By 
26 _____