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Richard C. Harkins  
4422 E. Lupine Ave.  
Phoenix, AZ 85028  
Telephone 602-694-3589  
Pro se

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2016 MAR 15 P 2:38

AZ CORP COMMISSION  
DOCKET CONTROL

**BEFORE THE ARIZONA CORPORATION COMMISSION**

COMMISSIONERS

DOUG LITTLE, Chairman  
BOB STUMP  
BOB BURNS  
TOM FORESE  
ANDY TOBIN

Arizona Corporation Commission

DOCKETED

MAR 15 2015

DOCKETED BY 

In the matter of:

USA BARCELONA REALTY ADVISORS,  
LLC, an Arizona limited liability company,

**DOCKET NO. S-20938A-15-0308**

USA BARCELONA HOTEL LAND  
COMPANY I, LLC, an Arizona limited  
liability company,

**RESPONDENT RICHARD C. HARKINS  
LIST OF WITNESSES AND EXHIBITS**

RICHARD C. HARKINS, an unmarried  
man,

ROBERT J. KERRIGAN (CRD no. 268516)  
An unmarried man,

GEORGE T. SIMMONS and JANET B.  
SIMMONS, husband and wife,

BRUCE L. ORR and SUSAN C. ORR,  
husband and wife,

Respondent Richard C. Harkins ("*Mr. Harkins*") hereby provides the list of anticipated witnesses and exhibits for the hearing of this matter.

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**I. WITNESSES**

Respondent Richard C. Harkins anticipates calling one or more of the following persons as witnesses during the presentation of his case in the hearing of this matter:

1. Robert J. Kerrigan, previous Executive Member, Barcelona Advisors
2. George T. Simmons, previous Executive Member, Barcelona Advisors
3. Bruce L. Orr, previous Executive Member, Barcelona Advisors
4. Patrick J. McDonough, previous employee, Barcelona Advisors
5. Jim Wilkerson, previous advisor to Barcelona Advisors
6. Richard Andrade, investor in, Barcelona Advisors
7. Paul Meka, previous employee, Barcelona Advisors
8. Rod Eaves, previous officer, Executive Member and current investor
9. Allen Weintraub, previous consultant to Barcelona REIT and Barcelona Advisors
10. Steve Chanen, President, Chanen Construction Company
11. Steve Betts, business consultant
12. Dale Schian, Bankruptcy Attorney, Phoenix, Arizona
13. Tony Manos, previous outside advisor to Barcelona Advisors
14. Chris Corpus, business associate
15. Any witness(es) necessary to lay foundation;
16. Any witness(es) necessary for rebuttal; and,
17. Any witness(es) listed by the Arizona Securities Division or any other Respondent in this matter.
18. Respondent Richard C. Harkins reserves the right to supplement this witness list based upon

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19. Discovery from the Arizona Securities Division or any other Respondent in this matter.

**II. EXHIBITS**

Respondent Richard C. Harkins anticipates introducing the following documents as exhibits during the presentation of his case in the hearing of this matter:

1. Any document produced by Respondent Richard C. Harkins to the Arizona Securities Division.
2. Any documents produced by the Arizona Securities Division or any other Respondent in this matter.
3. All exhibits listed by the Arizona Securities Division or any other Respondent in this matter.
4. Respondent Richard C. Harkins reserves the right to supplement this document exchange based on the receipt of documents from any other Respondent in this matter, the Arizona Securities Division or any third party whether produced to date or produced in the future.
5. Respondent Richard C. Harkins reserves the right to use documents not identified above in cross-examination or rebuttal.

DATED this 15 day of March, 2016.

By:   
Richard C. Harkins  
4422 E. Lupine Ave.  
Phoenix, AZ 85028  
Pro se

ORIGINAL and thirteen copies of the foregoing filed this 15 day of March, 2016 with:

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

COPY of the foregoing hand-delivered  
This \_\_\_ day of March, 2016 to:

Matthew J. Neubert  
Director of Securities  
Securities Division  
Arizona Corporation Commission  
1300 W. Washington Street, 3<sup>rd</sup> Floor  
Phoenix, AZ 85007

Hearing Officer  
Hearing Division  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, AZ 85007

Paul Kitchin  
Securities Division  
Arizona Corporation Commission  
1300 W. Washington, 3<sup>rd</sup> Floor  
Phoenix, AZ 85007

USA Barcelona Realty Advisors, LLC  
USA Barcelona Hotel Land Company I, LLC  
c/o Richard C. Harkins  
4422 East Lupine Avenue  
Phoenix, AZ 85028

Robert J. Kerrigan  
c/o Robert Mitchell  
Tiffany & Bosco, P.A.  
Camelback Esplanade II, Seventh Floor  
2525 East Camelback Road  
Phoenix, AZ 85016  
Counsel for Robert J. Kerrigan

George T. Simmons  
c/o Charles Berry

1 Clark Hill, PLC.  
2 14850 N. Scottsdale Rd  
3 Suite 500  
4 Scottsdale , AZ 85254

5 Bruce Orr  
6 3757 Falcon Avenue  
7 Long Beach, CA 90807

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