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AZ CORP COMMISSION
DOCKET CONTROL

2016 AUG 8 PM 3 13

1 **Robert J. Moss**
2 **Jennifer L. Moss**
3 125 W. Baylor Lane
4 Gilbert, AZ 85233

5 Telephone
6 (480) 706-1282

7
8 **BEFORE THE ARIZONA CORPORATION COMMISSION**

9 In the matter of:
10 Robert J. Moss and Jennifer L. Moss,
11 husband and wife,
12 The Fortitude Foundation, an Arizona
13 corporation,
14 Ventures 7000, LLC, an Oklahoma limited
15 liability company,
16 Jeffrey D. McHatton and Starla T.
17 McHatton, husband and wife,
18 Robert D. Sproat and Jane Doe Sproat,
19 husband and wife,
20 Kevin Krause, and Jane Doe Krause,
21 husband and wife, and
22 Vernon R. Twyman, Jr., a single man,
23 Respondents.

DOCKET NO. S-20953A-16-0061

**ANSWER OF ROBERT J. MOSS AND
JENNIFER L. MOSS TO THE
"AMENDED TEMPORARY ORDER
TO CEASE AND DESIST"**

(Assigned to Administrative Law Judge
Marc E. Stern)

Arizona Corporation Commission

DOCKETED

AUG 08 2016

DOCKETED BY *Y9*

23 Respondents, Robert J. Moss and Jennifer L. Moss ("Moss"), are currently w/out
24 financial ability to retain legal counsel, and hereby admits, denies and alleges as follows:

25 1. In response to paragraph 1 of the Temporary Order to Cease and Desist
26 ("TOCD"), Moss is without sufficient knowledge or information with which to form a
27 belief as to the truth of the allegations contained therein and therefore denies them.
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1 2. In response to paragraph 2 of the TOCD, Moss admits that Robert Moss has
2 been a director of The Fortitude Foundation (“TFF”). Moss admits that they reside in
3 Arizona.

4 3. In response to paragraph 3 of the TOCD, Moss is without sufficient
5 knowledge or information with which to form a belief as to the truth of the allegations
6 contained therein and therefore denies them. Moss admits that at some point Moss was a
7 director of V-7000.
8

9 4. In response to paragraph 4 of the TOCD, Moss admits to the sentence.
10

11 5. In response to paragraph 5 of the TOCD, Moss admits to being married.
12 Moss is without sufficient knowledge or information with which to form a belief as to the
13 truth of the allegations contained therein in the remainder of the paragraph and therefore
14 denies them.
15

16 6. In response to paragraph 6 of the TOCD, Moss admits the first and last
17 sentences of paragraph 6. Moss denies the remainder of this paragraph.

18 7. In response to paragraph 7 of the TOCD, Moss is without sufficient
19 knowledge or information with which to form a belief as to the truth of the allegations
20 contained therein and therefore denies them.
21

22 8. Moss admits the first and last sentences of paragraph 8 of the TOCD, but
23 denies the balance of the remaining allegations in paragraph 8 of the TOCD.

24 9. In response to paragraph 9 of the TOCD, Moss is without sufficient
25 knowledge or information with which to form a belief as to the truth of the allegations
26 contained therein and therefore denies them.
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1 10. In response to paragraph 10 of the TOCD, Moss admits that Robert Sproat
2 has been a director of TFF. Moss denies the balance of the allegations in this paragraph.

3 11. In response to paragraph 11 of the TOCD, Moss is without sufficient
4 knowledge or information with which to form a belief as to the truth of the allegations
5 contained therein and therefore denies them.
6

7 12. Moss denies the allegations set forth in paragraph 12 of the TOCD.

8 13. In response to paragraph 13 of the TOCD, Moss is without sufficient
9 knowledge or information with which to form a belief as to the truth of the allegations
10 contained therein and therefore denies them.
11

12 14. In response to paragraph 14 of the TOCD, this is not a substantive factual
13 paragraph. To the extent a response is required, the allegations set forth in paragraph 14
14 of the TOCD are denied.

15 15. Moss denies the allegations set forth in paragraph 15 of the TOCD.

16 16. Moss denies the allegations set forth in paragraph 16 of the TOCD.

17 17. Moss denies the allegations set forth in paragraph 17 of the TOCD.

18 18. Moss denies the allegations set forth in paragraph 18 of the TOCD.

19 19. Moss denies the allegations set forth in paragraph 19 of the TOCD.

20 20. In response to paragraph 20 of the TOCD, Moss is without sufficient
21 knowledge or information with which to form a belief as to the truth of the allegations
22 contained therein and therefore denies them.
23

24 21. In response to paragraph 21 of the TOCD, Moss is without sufficient
25 knowledge or information with which to form a belief as to the truth of the allegations
26 contained therein and therefore denies them.
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- 1 22. Moss denies the allegations set forth in paragraph 22 of the TOCD.
- 2 23. Moss denies the allegations set forth in paragraph 23 of the TOCD.
- 3 24. Moss denies the allegations set forth in paragraph 24 of the TOCD.
- 4 25. Moss denies the allegations set forth in paragraph 25 of the TOCD.
- 5 26. Moss denies the allegations set forth in paragraph 26 of the TOCD.
- 6 27. Moss admits the allegations set forth in paragraph 27 of the TOCD.
- 7 28. Moss admits the allegations set forth in paragraph 28 of the TOCD.
- 8 29. In response to paragraph 29 of the TOCD, Moss is without sufficient
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- 10 knowledge or information with which to form a belief as to the truth of the allegations
- 11 contained therein and therefore denies them.
- 12
- 13 30. Moss denies the allegations set forth in paragraph 30 of the TOCD.
- 14 31. Moss denies the allegations set forth in paragraph 31 of the TOCD.
- 15 32. Moss denies the allegations set forth in paragraph 32 of the TOCD.
- 16 33. In response to paragraph 33 of the TOCD, Moss is without sufficient
- 17
- 18 knowledge or information with which to form a belief as to the truth of the allegations
- 19 contained therein and therefore denies them.
- 20
- 21 34. In response to paragraph 34 of the TOCD, Moss is without sufficient
- 22 knowledge or information with which to form a belief as to the truth of the allegations
- 23 contained therein and therefore denies them.
- 24 35. In response to paragraph 35 of the TOCD, Moss is without sufficient
- 25 knowledge or information with which to form a belief as to the truth of the allegations
- 26 contained therein and therefore denies them.
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1 36. In response to paragraph 36 of the TOCD, Moss is without sufficient
2 knowledge or information with which to form a belief as to the truth of the allegations
3 contained therein and therefore denies them.

4 37. In response to paragraph 37 of the TOCD, Moss is without sufficient
5 knowledge or information with which to form a belief as to the truth of the allegations
6 contained therein and therefore denies them.

8 38. In response to paragraph 38 of the TOCD, Moss is without sufficient
9 knowledge or information with which to form a belief as to the truth of the allegations
10 contained therein and therefore denies them.

12 39. In response to paragraph 39 of the TOCD, Moss is without sufficient
13 knowledge or information with which to form a belief as to the truth of the allegations
14 contained therein and therefore denies them.

15 40. Moss denies the allegations set forth in paragraph 40 of the TOCD.

17 41. Moss denies the allegations set forth in paragraph 41 of the TOCD.

18 42. Moss denies the allegations set forth in paragraph 42 of the TOCD.

19 43. In response to paragraph 43 of the TOCD, Moss is without sufficient
20 knowledge or information with which to form a belief as to the truth of the allegations
21 contained therein and therefore denies them.

23 44. In response to paragraph 44 of the TOCD, Moss is without sufficient
24 knowledge or information with which to form a belief as to the truth of the allegations
25 contained therein and therefore denies them.
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1 45. In response to paragraph 45 of the TOCD, Moss is without sufficient
2 knowledge or information with which to form a belief as to the truth of the allegations
3 contained therein and therefore denies them.

4 46. In response to paragraph 46 of the TOCD, Moss is without sufficient
5 knowledge or information with which to form a belief as to the truth of the allegations
6 contained therein and therefore denies them.

7 47. In response to paragraph 47 of the TOCD, Moss is without sufficient
8 knowledge or information with which to form a belief as to the truth of the allegations
9 contained therein and therefore denies them.
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11 48. In response to paragraph 48 of the TOCD, Moss is without sufficient
12 knowledge or information with which to form a belief as to the truth of the allegations
13 contained therein and therefore denies them.
14

15 49. In response to paragraph 49 of the TOCD, Moss is without sufficient
16 knowledge or information with which to form a belief as to the truth of the allegations
17 contained therein and therefore denies them.
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19 50. In response to paragraph 49 of the TOCD, Moss is without sufficient
20 knowledge or information with which to form a belief as to the truth of the allegations
21 contained therein and therefore denies them.
22

23 51. Moss denies the allegations set forth in paragraph 51 of the TOCD.

24 52. In response to paragraph 52 of the TOCD, Moss admits the final sentence
25 of the paragraph and denies all preceding allegations.
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27 53. Moss denies the allegations set forth in paragraph 53 of the TOCD.

28 54. Moss denies the allegations set forth in paragraph 54 of the TOCD.

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- 55. Moss denies the allegations set forth in paragraph 55 of the TOCD.
- 56. Moss denies the allegations set forth in paragraph 56 of the TOCD.
- 57. Moss denies the allegations set forth in paragraph 57 of the TOCD.
- 58. Moss denies the allegations set forth in paragraph 58 of the TOCD.
- 59. Moss denies the allegations set forth in paragraph 59 of the TOCD.
- 60. Moss denies the allegations set forth in paragraph 60 of the TOCD.
- 61. Moss denies the allegations set forth in paragraph 61 of the TOCD.
- 62. Moss denies the allegations set forth in paragraph 62 of the TOCD.
- 63. Moss denies the allegations set forth in paragraph 63 of the TOCD.
- 64. Moss denies the allegations set forth in paragraph 64 of the TOCD.
- 65. Moss denies the allegations set forth in paragraph 65 of the TOCD.
- 66. Moss denies the allegations set forth in paragraph 66 of the TOCD.
- 67. Moss denies the allegations set forth in paragraph 67 of the TOCD.
- 68. Moss denies the allegations set forth in paragraph 68 of the TOCD.
- 69. Moss denies the allegations set forth in paragraph 69 of the TOCD.
- 70. Moss denies the allegations set forth in paragraph 70 of the TOCD.
- 71. Moss denies the allegations set forth in paragraph 71 of the TOCD.

72. In response to paragraph 72 of the TOCD, Moss is without sufficient knowledge or information with which to form a belief as to the truth of the allegations contained therein and therefore denies them.

73. In response to paragraph 73 of the TOCD, Moss is without sufficient knowledge or information with which to form a belief as to the truth of the allegations contained therein and therefore denies them.

1 74. In response to paragraph 74 of the TOCD, Moss is without sufficient
2 knowledge or information with which to form a belief as to the truth of the allegations
3 contained therein and therefore denies them.

4 75. Moss denies the allegations set forth in paragraph 75 of the TOCD.

5 76. Moss denies the allegations set forth in paragraph 76 of the TOCD.

6 77. Moss denies the allegations set forth in paragraph 77 of the TOCD.

7 78. Moss denies the allegations set forth in paragraph 78 of the TOCD.

8 79. In response to paragraph 79 of the TOCD, Moss is without sufficient
9 knowledge or information with which to form a belief as to the truth of the allegations
10 contained therein and therefore denies them.
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12 80. In response to paragraph 80 of the TOCD, Moss is without sufficient
13 knowledge or information with which to form a belief as to the truth of the allegations
14 contained therein and therefore denies them.
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16 81. In response to paragraph 81 of the TOCD, Moss is without sufficient
17 knowledge or information with which to form a belief as to the truth of the allegations
18 contained therein and therefore denies them.
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20 82. In response to paragraph 82 of the TOCD, Moss is without sufficient
21 knowledge or information with which to form a belief as to the truth of the allegations
22 contained therein and therefore denies them.
23

24 83. In response to paragraph 83 of the TOCD, Moss is without sufficient
25 knowledge or information with which to form a belief as to the truth of the allegations
26 contained therein and therefore denies them.
27

1 84. In response to paragraph 84 of the TOCD, Moss is without sufficient
2 knowledge or information with which to form a belief as to the truth of the allegations
3 contained therein and therefore denies them.

4 85. In response to paragraph 85 of the TOCD, Moss is without sufficient
5 knowledge or information with which to form a belief as to the truth of the allegations
6 contained therein and therefore denies them.

7 86. In response to paragraph 86 of the TOCD, Moss is without sufficient
8 knowledge or information with which to form a belief as to the truth of the allegations
9 contained therein and therefore denies them.
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11 87. In response to paragraph 87 of the TOCD, Moss is without sufficient
12 knowledge or information with which to form a belief as to the truth of the allegations
13 contained therein and therefore denies them.
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15 88. In response to paragraph 88 of the TOCD, Moss is without sufficient
16 knowledge or information with which to form a belief as to the truth of the allegations
17 contained therein and therefore denies them.
18

19 89. In response to paragraph 89 of the TOCD, Moss is without sufficient
20 knowledge or information with which to form a belief as to the truth of the allegations
21 contained therein and therefore denies them.
22

23 90. In response to paragraph 90 of the TOCD, Moss is without sufficient
24 knowledge or information with which to form a belief as to the truth of the allegations
25 contained therein and therefore denies them.
26

1 91. In response to paragraph 91 of the TOCD, Moss is without sufficient
2 knowledge or information with which to form a belief as to the truth of the allegations
3 contained therein and therefore denies them.

4 92. In response to paragraph 92 of the TOCD, Moss is without sufficient
5 knowledge or information with which to form a belief as to the truth of the allegations
6 contained therein and therefore denies them.

7 93. In response to paragraph 93 of the TOCD, Moss is without sufficient
8 knowledge or information with which to form a belief as to the truth of the allegations
9 contained therein and therefore denies them.
10

11 94. Moss denies the allegations set forth in paragraph 94 of the TOCD.

12 95. Moss denies the allegations set forth in paragraph 95 of the TOCD.

13 96. Moss denies the allegations set forth in paragraph 96 of the TOCD.

14 97. Moss denies the allegations set forth in paragraph 97 of the TOCD.

15 98. Moss denies the allegations set forth in paragraph 98 of the TOCD.

16 99. In response to paragraph 99 of the TOCD, Moss is without sufficient
17 knowledge or information with which to form a belief as to the truth of the allegations
18 contained therein and therefore denies them.
19

20 100. In response to paragraph 100 of the TOCD, Moss is without sufficient
21 knowledge or information with which to form a belief as to the truth of the allegations
22 contained therein and therefore denies them.
23

24 101. In response to paragraph 101 of the TOCD, Moss is without sufficient
25 knowledge or information with which to form a belief as to the truth of the allegations
26 contained therein and therefore denies them.
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1 102. In response to paragraph 102 of the TOCD, Moss is without sufficient
2 knowledge or information with which to form a belief as to the truth of the allegations
3 contained therein and therefore denies them.

4 103. In response to paragraph 103 of the TOCD, Moss is without sufficient
5 knowledge or information with which to form a belief as to the truth of the allegations
6 contained therein and therefore denies them.

7 104. In response to paragraph 104 of the TOCD, Moss is without sufficient
8 knowledge or information with which to form a belief as to the truth of the allegations
9 contained therein and therefore denies them.
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11 105. In response to paragraph 105 of the TOCD, Moss is without sufficient
12 knowledge or information with which to form a belief as to the truth of the allegations
13 contained therein and therefore denies them.
14

15 106. In response to paragraph 106 of the TOCD, Moss is without sufficient
16 knowledge or information with which to form a belief as to the truth of the allegations
17 contained therein and therefore denies them.
18

19 107. In response to paragraph 107 of the TOCD, Moss is without sufficient
20 knowledge or information with which to form a belief as to the truth of the allegations
21 contained therein and therefore denies them.
22

23 108. In response to paragraph 108 of the TOCD, Moss is without sufficient
24 knowledge or information with which to form a belief as to the truth of the allegations
25 contained therein and therefore denies them.
26

1 109. In response to paragraph 109 of the TOCD, Moss is without sufficient
2 knowledge or information with which to form a belief as to the truth of the allegations
3 contained therein and therefore denies them.

4 110. In response to paragraph 110 of the TOCD, Moss is without sufficient
5 knowledge or information with which to form a belief as to the truth of the allegations
6 contained therein and therefore denies them.

7 111. In response to paragraph 111 of the TOCD, Moss is without sufficient
8 knowledge or information with which to form a belief as to the truth of the allegations
9 contained therein and therefore denies them.
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11 112. In response to paragraph 112 of the TOCD, Moss is without sufficient
12 knowledge or information with which to form a belief as to the truth of the allegations
13 contained therein and therefore denies them.
14

15 113. In response to paragraph 113 of the TOCD, Moss is without sufficient
16 knowledge or information with which to form a belief as to the truth of the allegations
17 contained therein and therefore denies them.
18

19 114. In response to paragraph 114 of the TOCD, Moss is without sufficient
20 knowledge or information with which to form a belief as to the truth of the allegations
21 contained therein and therefore denies them.
22

23 115. In response to paragraph 115 of the TOCD, Moss is without sufficient
24 knowledge or information with which to form a belief as to the truth of the allegations
25 contained therein and therefore denies them.
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1 116. In response to paragraph 116 of the TOCD, Moss is without sufficient
2 knowledge or information with which to form a belief as to the truth of the allegations
3 contained therein and therefore denies them.

4 117. In response to paragraph 117 of the TOCD, Moss is without sufficient
5 knowledge or information with which to form a belief as to the truth of the allegations
6 contained therein and therefore denies them.

7 118. In response to paragraph 118 of the TOCD, Moss is without sufficient
8 knowledge or information with which to form a belief as to the truth of the allegations
9 contained therein and therefore denies them.
10

11 119. In response to paragraph 119 of the TOCD, Moss is without sufficient
12 knowledge or information with which to form a belief as to the truth of the allegations
13 contained therein and therefore denies them.
14

15 120. In response to paragraph 120 of the TOCD, Moss is without sufficient
16 knowledge or information with which to form a belief as to the truth of the allegations
17 contained therein and therefore denies them.
18

19 121. In response to paragraph 121 of the TOCD, Moss is without sufficient
20 knowledge or information with which to form a belief as to the truth of the allegations
21 contained therein and therefore denies them.
22

23 122. In response to paragraph 122 of the TOCD, Moss is without sufficient
24 knowledge or information with which to form a belief as to the truth of the allegations
25 contained therein and therefore denies them.
26

1 123. In response to paragraph 123 of the TOCD, Moss is without sufficient
2 knowledge or information with which to form a belief as to the truth of the allegations
3 contained therein and therefore denies them.

4 124. In response to paragraph 124 of the TOCD, Moss is without sufficient
5 knowledge or information with which to form a belief as to the truth of the allegations
6 contained therein and therefore denies them.

7 125. In response to paragraph 125 of the TOCD, Moss is without sufficient
8 knowledge or information with which to form a belief as to the truth of the allegations
9 contained therein and therefore denies them.
10

11 126. In response to paragraph 126 of the TOCD, Moss is without sufficient
12 knowledge or information with which to form a belief as to the truth of the allegations
13 contained therein and therefore denies them.
14

15 127. In response to paragraph 127 of the TOCD, Moss is without sufficient
16 knowledge or information with which to form a belief as to the truth of the allegations
17 contained therein and therefore denies them.
18

19 128. In response to paragraph 128 of the TOCD, Moss is without sufficient
20 knowledge or information with which to form a belief as to the truth of the allegations
21 contained therein and therefore denies them.
22

23 129. In response to paragraph 129 of the TOCD, Moss is without sufficient
24 knowledge or information with which to form a belief as to the truth of the allegations
25 contained therein and therefore denies them.
26

27 **(NOTE: In the TOCD, the numbering at heading**

28 **“VIOLATION OF A.R.S. §44-1841” reverts to paragraph 130)**

1 130. Moss denies the allegations set forth in paragraph 130 of the TOCD.

2 131. Moss denies the allegations set forth in paragraph 131 of the TOCD.

3 132. Moss denies the allegations set forth in paragraph 132 of the TOCD.

4 133. Moss denies the allegations set forth in paragraph 133 of the TOCD.

5 134. Moss denies the allegations set forth in paragraph 134 of the TOCD.

6 135. Moss denies the allegations set forth in paragraph 135 of the TOCD.

7 136. Moss denies the allegations set forth in paragraph 136 of the TOCD.

8 137. Moss denies the allegations set forth in paragraph 137 of the TOCD.

9 138. Moss denies the allegations set forth in paragraph 138 of the TOCD.

10 139. Moss denies the allegations set forth in paragraph 139 of the TOCD.

11 140. Moss denies the allegations set forth in paragraph 140 of the TOCD.

12 141. Moss denies the allegations set forth in paragraph 141 of the TOCD.

13 142. Moss denies the allegations set forth in paragraph 142 of the TOCD.

14 143. Moss denies the allegations set forth in paragraph 143 of the TOCD.

15 144. Moss denies the allegations set forth in paragraph 144 of the TOCD

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19 *** PLEASE NOTE:**

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21 * Numbers 145-152 re: Affirmative Defenses were previously answered in the first
22 answer submitted from the February 23, 2016 "Original TC & D".

23 [END – PAGE 15 OF 16]

24 *** PLEASE NOTE:**

25
26 * Signature Page to Follow (last & final page 16 of 16)

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MOSS : TOCD AMENDED ANSWER DATED this 7th day of August, 2016.

Robert J. Moss

Jennifer L. Moss

Robert J. Moss

Jennifer L. Moss

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ORIGINAL and **13 COPIES** of the
Foregoing hand-delivered this 8th day
Of August, 2016 to:

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

COPY of the foregoing mailed this
8th day of August, 2016 to:

James Burgess
Senior Enforcement Attorney
Securities Division,
Arizona Corporation Commission
1300 W. Washington, Third Floor
Phoenix, Arizona 85007

[END – PAGE 16 OF 16]