

ORIGINAL



0000175348

1 NORMAN C. KEYT (4225)
 7373 E. Doubletree Ranch Rd, Ste 165
 2 Scottsdale, AZ 85258
 Phone: 480.664.8466
 3 nck@keytlaw.com
 Attorney for Timothy and Stacey Wales

REPORT
 AZ CORP C
 DOCKET COR

2016 DEC 7 PM 1 36

BEFORE THE ARIZONA CORPORATION COMMISSION

5 In the Matter of:
 6 Visionary Business Works, Inc., d/b/a Fleetronix,
 7 Robert Brian Brauer and Melissa Brauer,
 8 Timothy John Wales and Stacey Wales,
 9 Respondents.

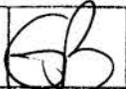
NO. S-20976A-16-0210

**MOTION FOR ORDER
PERMITTING PREHEARING
DEPOSITIONS**

Arizona Corporation Commission

DOCKETED

DEC 07 2016

DOCKETED BY 

11 Come now Respondents Timothy John Wales and Stacey Wales (hereafter "Wales") and move
 12 that pursuant to A.R.S § 41-1062.A.4, the Wales be permitted to conduct prehearing depositions of
 13 Javier Cano, Jorge De Las Casas, John Warren, Robert Brauer, Tammy Wight and J.W. Wight.

14 Respondents are charged with violation of A.R.S § 44-1841, the offer and sale of unregistered
 15 securities. Transactions by an issuer not involving any public offering are exempt from the
 16 registration requirement of A.R.S § 44-1841.

17 Similarly, Respondents are charged with violation of A.R.S § 44-1842, transactions by
 18 unregistered dealers. The commission can only prevail on this allegation if there was a public
 19 offering of securities required in this matter.

20 Respondents are also charged with fraud in connection with the sale or offer of securities, in
 21 violation of ARS 44-1991. Cano, De Las Casas and the Wights were each shareholders of
 22 Visionary Business Works, Inc.

The Wights were brought into the business by Co-Respondent Robert Brian Brauer. Brauer is
 the former chief financial officer for Visionary Business Works, Inc. The Wales need to discover
 exactly what representations about the business were made by Brauer to the Wights.

Adequate defense against the allegations of the commission are dependent on how each of the
 shareholders came to be involved in the business and on exactly what representations they claim
 were made to them, inducing them to become involved. Respondents need to discover what these

1 witness testimony will be prior to the hearing to adequately prepare their defense.

2 Therefore, Respondents request the approval of the hearing officer to issues subpoenas for
3 depositions to each of the witnesses named above.

4 DATED this 7th day of December 2016.



Norman C. Keyt
Attorney for Timothy and Stacey Wales

7 Original filed with Arizona Corporation Commission
8 December 7, 2016 with copy to:

9 Matthew J. Neubert
10 Director of Securities
11 Arizona Corporation Commission
12 1200 W. Washington
13 Phoenix, AZ 85007

14
15
16
17
18
19
20
21
22

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

BEFORE THE ARIZONA CORPORATION COMMISSION

NO. S-20976A-16-0210

In the Matter of:

Visionary Business Works, Inc., d/b/a Fleetronix,

Robert Brian Brauer and Melissa Brauer,

Timothy John Wales and Stacey Wales,

Respondents.

**ORDER PERMITTING
PREHEARING DEPOSITIONS**

UPON motion of Respondents Timothy and Stacey Wales, and good cause appearing;
IT IS ORDERED THAT the Respondents may conduct depositions of the following witnesses
and issue subpoenas to secure the attendance of the witnesses.

- 1. Javier Cano
- 2. Jorge De Las Casas
- 3. John Warren
- 4. Robert Brauer
- 5. Tammy Wight
- 6. J.W. Wight.

DATED this _____ day of December 2016.

Mark Preny
Administrative Law Judge

Copies mailed/delivered
December 7, 2016 with copy to:

Matthew J. Neubert
Director of Securities
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

1 Norman C. Keyt
7373 E. Doubletree Ranch Rd, Ste 165
2 Scottsdale, AZ 85258
Attorney for Respondents Wales

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22