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TRONCELLITO LAW  
11811 N. TATUM BOULEVARD, SUITE 3031  
PHOENIX, ARIZONA 85028  
(602) 374-2154  
mike@troncellitolaw.com

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Arizona Corporation Commission

DOCKETED

JAN 19 2017

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Michael A. Troncellito Jr. [022302]  
mike@troncellitolaw.com

Attorney for Bauer Respondents

**BEFORE THE ARIZONA CORPORATION COMMISSION**

In the matter of:

Visionary Business Works, Inc., d/b/a  
Flectronix, an Arizona corporation,

Robert Brian Brauer and Melissa Brauer,  
husband and wife,

and

Timonthy John Wales and Stacey Wales,  
husband and wife,

Respondents.

DOCKET NO. S-20976A-16-0210

ANSWER OF RESPONDENTS ROBERT  
BRIAN BRAUER AND MELISSA  
BRAUER

NOW COME Respondents ROBERT BRIAN BRAUER and MELISSA BRAUER, by  
and through undersigned counsel, and hereby answer and respond to the Temporary Order to  
Cease and Desist and Notice of Opportunity for Hearing docketed by the Arizona Corporation  
Commission on or about June 29, 2016, which was served upon Respondents on or about  
December 21, 2016. Respondents ROBERT BRIAN BRAUER and MELISSA BRAUER  
answer as follows:

**I. JURISDICTION**

1. Respondents ROBERT BRIAN BRAUER and MELISSA BRAUER (hereinafter  
jointly referred to as "BRAUER RESPONDENTS") admit the allegations contained in paragraph

1.

## II. RESPONDENTS

2. BRAUER RESPONDENTS **admit** the allegations contained in paragraph 2.
3. BRAUER RESPONDENTS **admit** the allegations contained in paragraph 3.
4. BRAUER RESPONDENTS **admit** the allegations contained in paragraph 4.
5. BRAUER RESPONDENTS **admit** the first and third sentences of paragraph 5.

BRAUER RESPONDENTS **deny** the second sentence of paragraph 5.

6. BRAUER RESPONDENTS **admit** the allegations contained in paragraph 6.
7. BRAUER RESPONDENTS **admit** the allegations contained in paragraph 7.
8. This paragraph requires no response. To the extent a response is required, the

BRAUER RESPONDENTS **deny** the allegations contained in paragraph 8.

## III. FACTS

9. BRAUER RESPONDENTS **admit** the allegations contained in paragraph 9.

10. BRAUER RESPONDENTS **admit** “the Wales also tasked Brauer with finding investors by reaching out to his network” and **deny** the remaining allegations contained in paragraph 10.

11. BRAUER RESPONDENTS **deny** the allegations contained in paragraph 11.

12. BRAUER RESPONDENTS are without sufficient knowledge to either admit or deny this allegation and therefore respectfully **deny** the same.

13. BRAUER RESPONDENTS **admit** that J.W.W. and T.W. invested in Visionary stock, **admit** that J.W.W. and T.W. were friends of the BRAUER RESPONDENTS, **and** admit that ROBERT BRIAN BRAUER discussed investing in Visionary with J.W.W. and T.W. in their

1 home. BRAUER RESPONDENTS **deny** encouraging J.W.W. and T.W. to invest in Visionary  
2 and further **deny** the remaining allegations contained in paragraph 13.

3 14. BRAUER RESPONDENTS **admit** that Tim Wales was involved in a phone call  
4 with J.W.W., T.W., and ROBERT BRIAN BRAUER wherein Visionary was discussed.

5 BRAUER RESPONDENTS **deny** the remainder of the allegations contained in paragraph 14.

6 15. BRAUER RESPONDENTS **admit** the allegations contained in paragraph 15.

7 16. BRAUER RESPONDENTS **deny** the allegations contained in paragraph 16.

8 17. BRAUER RESPONDENTS are without sufficient information to admit or deny  
9 the allegations contained in paragraph 17 and therefore respectfully **deny** the allegations  
10 contained in paragraph 17.

11 18. BRAUER RESPONDENTS are without sufficient information to admit or deny  
12 the allegations contained in paragraph 18 and therefore respectfully **deny** the allegations  
13 contained in paragraph 18.

14 19. Individually, Respondent ROBERT BRIAN BRAUER **denies** doing inaccurate  
15 accounting work as alleged in paragraph 19. BRAUER RESPONDENTS are otherwise without  
16 sufficient information to admit or deny the allegations contained in paragraph 19 and therefore  
17 respectfully **deny** the allegations contained in paragraph 19.

18 20. BRAUER RESPONDENTS are without sufficient information to admit or deny  
19 the allegations contained in paragraph 20 and therefore respectfully **deny** the allegations  
20 contained in paragraph 20.

21 21. BRAUER RESPONDENTS **deny** the allegations contained in paragraph 21.

1           22.     BRAUER RESPONDENTS are without sufficient information to admit or deny  
2 the allegations contained in paragraph 22 and therefore respectfully **deny** the allegations  
3 contained in paragraph 22.

4           23.     BRAUER RESPONDENTS are without sufficient information to admit or deny  
5 the allegations contained in paragraph 23 and therefore respectfully **deny** the allegations  
6 contained in paragraph 23.

7           24.     BRAUER RESPONDENTS are without sufficient information to admit or deny  
8 the allegations contained in paragraph 24 and therefore respectfully **deny** the allegations  
9 contained in paragraph 24.

10          25.     BRAUER RESPONDENTS are without sufficient information to admit or deny  
11 the allegations contained in paragraph 25 and therefore respectfully **deny** the allegations  
12 contained in paragraph 25.

13  
14  
15                               **IV. VIOLATION OF A.R.S. 44-1841**  
16                               **(Offer and Sale of Unregistered Securities)**

17          26.     BRAUER RESPONDENTS **deny** the allegations contained in paragraph 26.

18          27.     BRAUER RESPONDENTS are without sufficient information to admit or deny  
19 the allegations contained in paragraph 27 and therefore respectfully **deny** the allegations  
20 contained in paragraph 27.

21          28.     BRAUER RESPONDENTS are without sufficient information to admit or deny  
22 the allegations contained in paragraph 28 and therefore respectfully **deny** the allegations  
23 contained in paragraph 28.

24  
25                               **V.     VIOLATION OF ARS 44-1842**  
26                               **(Transactions by Unregistered Dealers or Salesmen)**

27          29.     BRAUER RESPONDENTS **deny** the allegations contained in paragraph 29.



