



Commissioners

SHEILA LUMPE
Chair

HAROLD CRUMPTON

CONNIE MURRAY

ROBERT G. SCHEMENAUER

M. DIANNE DRAINER
Vice Chair

Missouri Public Service Commission

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://www.ecodev.state.mo.us/psc/>

May 10, 2000

BRIAN D. KINKADE
Executive Director

GORDON L. PERSINGER
Director, Research and Public Affairs

WESS A. HENDERSON
Director, Utility Operations

ROBERT SCHALLENBERG
Director, Utility Services

DONNA M. KOLILIS
Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

FILED

MAY 10 2000

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

**Missouri Public
Service Commission**

RE: Case No. MC-2000-397

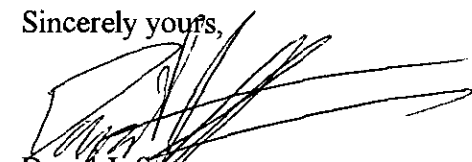
Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **SUGGESTIONS IN SUPPORT OF THE UNANIMOUS STIPULATION AND AGREEMENT.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,


David J. Stueven
Assistant General Counsel
(573) 751-6726
(573) 751-9285 (Fax)

DS/dkf
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
MAY 10 2000
Missouri Public
Service Commission

Director of the Department of
Manufactured Homes and Modular Units
of the Public Service Commission,

Complainant,

v.

Rock Road Trailer Parts and Sales, Inc.,

Respondent.

Case No. MC-2000-397

SUGGESTIONS IN SUPPORT OF
THE UNANIMOUS STIPULATION AND AGREEMENT

COMES NOW the Director of the Division of Manufactured Homes, Recreational Vehicles and Modular Units of the Public Service Commission ("Director") and in support of the Stipulation and Agreement filed in this matter states as follows:

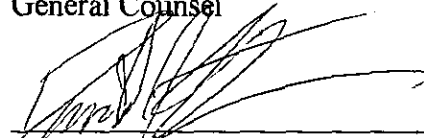
1. Rock Road Trailer Parts and Sales, Inc. ("Rock Road") has reached a settlement with Susann Piccininno, the consumer who purchased the manufactured home that is the subject of this Complaint case. A copy of that agreement is attached as Appendix A. Ms. Piccininno is satisfied with this agreement and has stated that she does not wish Rock Road to attempt to make any further repairs to her home.

2. While the Director could still pursue this matter, he is satisfied with the agreement between the parties, as well as the probationary period that Rock Road consented to in the Stipulation and Agreement. This is the first formal complaint filed against Rock Road. Further, the Director receives very few consumer complaints against this dealer. The six-month

probationary period should be sufficient to ensure that Rock Road does not sell manufactured homes that do not meet the requisite code.

Respectfully submitted,

DANA K. JOYCE
General Counsel

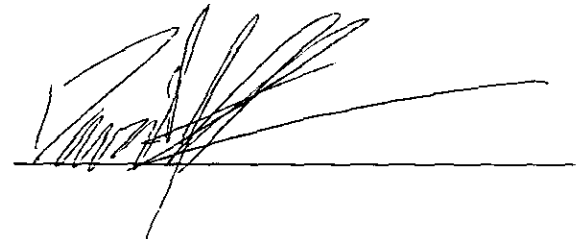


David J. Stueven
Assistant General Counsel
Missouri Bar No. 51274

Attorney for the Director of the Division of
Manufactured Homes and Modular Units of
the Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
(573) 751-8702
(573) 751-9285 (Fax)

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the persons listed below on this 10th day of May 2000.



LAW OFFICES

**CARSON
& COIL, P.C.**

515 East High Street, P.O. Box 28
Jefferson City, MO 65102

573-636-2177
Fax No. 573-636-7119

Michael P. Riley
Ronald R. McMillin
Eugene G. Bushmann
James W. Gallaher
Lori J. Levine
Rudolph L. Veit
R. Max Humphreys
Mark A. Ludwig

Dana L. Frese
Edward C. Clausen
Carla G. Holste
Kent L. Brown
Douglas W. Hennon
Charles J. McPheeters
Paul Graham

Jack C. Hauser, Jr.
Charles A. "Chip" Gentry
James W. Gallaher, Jr.

Forrest P. Carson	1910-1981
Cullen Coil	1907-1989

April 12, 2000

Mr. David J. Stueven
Assistant General Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

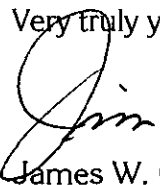
Re: Director of Dept. of Manuf. Homes v. Rock Road Trailer
Case No. MC-2000-397

Dear David:

I am enclosing an Agreement between Susan Piccininno and Rock Road Trailer Sales and Service, Inc., fully executed by both parties. You will notice that Ms. Piccininno acknowledges that her consumer complaints have been fully resolved and satisfied and that this document may be filed with the Public Service Commission as evidence of that satisfaction. I am tendering the document for that purpose. Title to the mobile home has also been assigned to Ms. Piccininno and she has received a cashiers check from Rock Road in the sum of \$6,950.00 in order to satisfy the promises made in the Agreement.

I believe this Agreement allows us to conclude Rode Road Trailer Sales and Service's matter with the Public Service Commission on the basis of the probation which we discussed by phone. If you would prepare the necessary paperwork I would appreciate it. Please give me a call if you have any additional questions.

Very truly yours,


James W. Gallaher

JWG:bl

Enclosure

RECEIVED
APR 13 2000

COMMISSION COUNSEL
PUBLIC SERVICE COMMISSION

APPENDIX A

AGREEMENT

THIS AGREEMENT, made and entered into this 11th day of April, 2000, by and between Susann Piccininno, hereafter "Buyer," and Rock Road Trailer Sales and Service, Inc., hereafter "Seller."

WITNESSETH:

On December 9, 1998, Buyer purchased a Redman home, Serial No. 10603221, from Seller. Thereafter Buyer occupied the home as her residence.

On October 27, 1999, Buyer filed a consumer complaint with the Director of the Department of Manufactured Homes and Modular Units of the Missouri Public Service Commission and also on or about that date filed a consumer complaint with the Office of the Attorney General of the State of Missouri.

In her complaint, Buyer alleged among other things that there were deficiencies in the home and that it did not comply with applicable codes and regulations and that the home was not set up in conformity with Missouri statutes and Public Service Commission Rules and Regulations. Buyer's complaints are specifically outlined in the consumer complaints filed with the agencies referred to above.

The parties, pursuant to the terms of this Agreement, do hereby resolve the outstanding issues between them as outlined herein. In consideration of Seller's payment to the Buyer of the sum of Six Thousand Nine Hundred Fifty Dollars (\$6,950.00), the receipt of which is hereby acknowledged, the Buyer does release and discharge Seller from all liability growing out of or resulting from Buyer's purchase of the manufactured home referred to above and hereby accepts said Six Thousand Nine Hundred Fifty Dollars (\$6,950.00) in full satisfaction of all claims made in the complaints filed with the Missouri Public Service Commission and the Attorney General of the State

of Missouri.

With this settlement, Buyer acknowledges that her consumer complaints have been fully resolved and satisfied and that this settlement may be filed with the Missouri Public Service Commission and the Attorney General of the State of Missouri as evidence of that satisfaction.

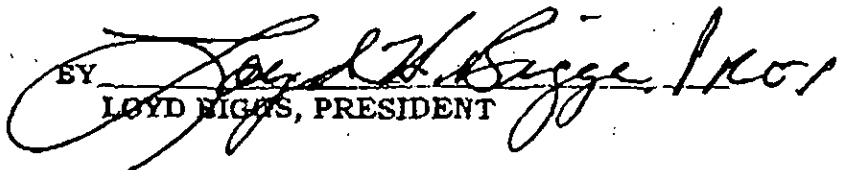
The parties acknowledge that this settlement is the compromise of a doubtful and disputed claim and that payment made herein is not to be construed as an admission of liability on the part of the Seller, by whom liability is expressly denied.

BUYER:


SUSANN PICCININO

SELLER:

ROCK ROAD TRAILER PARTS
AND SALES, INC.

BY 
LOYD BIGGS, PRESIDENT

OFFICE VALIDATION



MISSOURI DEPARTMENT OF REVENUE
APPLICATION FOR MISSOURI TITLE AND LICENSE

ORIGINAL <input checked="" type="checkbox"/>	DUPPLICATE <input type="checkbox"/>	NON-NEGOT <input type="checkbox"/>	REPOSSESSED <input type="checkbox"/>	CORRECTED <input type="checkbox"/>	MECHANIC LIEN <input type="checkbox"/>	SALVAGE <input type="checkbox"/>	DUP SALVAGE <input type="checkbox"/>	JUNK <input type="checkbox"/>	DUP JUNK <input type="checkbox"/>	TRANSFER ON DEATH (TOD) <input checked="" type="checkbox"/>	TENANTS IN COMMON <input type="checkbox"/>	
OWNER'S NAME - LAST, FIRST, MIDDLE (ONLY FIRST 39 POSITIONS WILL PRINT ON TITLE) INCLUDING TOD PICCININNO, SUSANN							TOD BENEFICIARIES IF APPLICABLE MICHELE ROUTH					
STREET ADDRESS, R.R. OR P.O. BOX NUMBER 419 FAIR OAKS							COUNTY FRANKLIN	FLEET NUMBER		LR NUMBER		
CITY, STATE, ZIP CODE ST. CLAIR, MO. 63077							OUTSIDE CITY LIMITS? <input type="checkbox"/> YES	TELEPHONE NUMBER 636 6298257				
							DLN/ESN/FEIN NUMBER		PRICE \$14000.00			

VEHICLE	YEAR MAKE 77 REDMOND		VEHICLE IDENTIFICATION NUMBER (IF TYPING, DISREGARD BLOCK CONSTRAINTS) 10603221				BODY STYLE Van		REBATE \$	
	COLOR	FUEL	- G. GAS P. PROPANE D. DIESEL E. ELECTRIC N. NATURAL O. OTHER		GVWR OVER 16000 LBS <input type="checkbox"/> YES	IF NEW, LST GVWR	MILEAGE	CODE	PURCHASE DATE 4-11-2000	VEHICLE TRADE-IN \$
	KIND OF VEHICLE B. PASSENGER M. MOTORCYCLE T. TRUCK C. TRICYCLE D. TRAILER R. REC VEHICLE B. BUS A. ATV		<input type="checkbox"/> NEW <input checked="" type="checkbox"/> USED (MSO) (TITLE)		PREVIOUS TITLE NUMBER AR309994		STATE MO	ZONE <input checked="" type="checkbox"/> L. LOCAL S. SHUTTLE <input type="checkbox"/> F. FARM T. TRANSIT	GR. WT. OR SEATING CAPACITY	OTHER CREDIT \$
			K.O.V.	CYL.	H.P.	TAB NUMBER	EXP. MO	EXP. YR	SPECIAL P	NET PRICE \$14000.00

LIEN/MAIL TO	FIRST LIEN VEH SUB TO LIEN? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		FIRST LIEN DATE	MAIL TITLE TO ADDRESS <input type="checkbox"/> BELOW NO LIEN ON VEHICLE.	LIENHOLDER'S TELEPHONE NO.	SECOND LIEN <input type="checkbox"/> YES <input type="checkbox"/> NO	SECOND LIEN DATE
	1 NAME				2 SECOND LIENHOLDER NAME		
	STREET ADDRESS, R.R. OR P.O. BOX NUMBER				STREET ADDRESS, R.R. OR P.O. BOX NUMBER		
	CITY, STATE, ZIP CODE				CITY, STATE, ZIP CODE		

TRADE-IN/ TRANSFER	<input type="checkbox"/> TRADE-IN	YEAR	MAKE	VEHICLE IDENTIFICATION NUMBER		All motor vehicle records are currently open to the public; however, you may protect the personal information on your motor vehicle records from release for public use or bulk mailing by completing form DOR-4673, Restriction of Personal Information.	FEE'S
	<input type="checkbox"/> LICENSE TRANSFER	LICENSE NUMBER	EXP YEAR	HP	TITLE NUMBER		LICENSE FEE \$ RESERVATION FEE

OWNER SIG	<p>If this motor vehicle is registered at the time application for title is made, my signature shall certify that I have and will maintain during the period of registration, financial responsibility with respect to each motor vehicle that I own, license or operate on the streets or highways.</p> <p>You must present your insurance card or other acceptable proof of financial responsibility.</p> <p>Any false affidavit is a crime under Section 575.050 of Missouri law</p>	<p>"I CERTIFY UNDER PENALTY OF PERJURY THAT THE FACTS HEREIN ARE TRUE TO THE BEST OF MY KNOWLEDGE."</p> <p><i>[Signature]</i></p>	\$
			<p>ADDITIONAL W/P/D/OTF</p> <p>\$</p> <p>TRANSFER FEE</p>

SELLER	NO. DEALER NUMBER	DEALER NAME	CITY STATE ZIP CODE	TELEPHONE NUMBER	\$
	1403	Rock Road & Milebridge	Salisbury Bridgeport Md 20444	314-734-9705	\$
	I CERTIFY UNDER PENALTY OF PERJURY THAT THE FACTS HEREIN ARE TRUE TO THE BEST OF MY KNOWLEDGE.			SIGNATURE OF DEALER OR REPRESENTATIVE	TRADE-IN <input type="checkbox"/> YES <input type="checkbox"/> NO
				Rose M. Smith	\$

NOTARY DUP. TITLE ONLY	DUPLICATE TITLE ONLY - COMPLETE REASON AND NOTARIZE. NOTARY INFORMATION APPLIES TO APPLICANT'S SIGNATURE. <input type="checkbox"/> LOST <input type="checkbox"/> STOLEN <input type="checkbox"/> MUTILATED (ATTACH MUTILATED TITLE) <input type="checkbox"/> NEVER RECEIVED - LOST IN MAIL		IS THIS A NON-TAXABLE TRANSFER? <input type="checkbox"/> YES <input type="checkbox"/> NO		RENEWAL PENALTY \$
	NOTARY PUBLIC EMBOSSESSOR OR BLACK RUBBER STAMP SEAL		STATE	COUNTY (OR CITY OF ST. LOUIS)	FOR OFFICE USE ONLY
	SUBSCRIBED AND SWORN BEFORE ME THIS		DAY OF	<input checked="" type="checkbox"/> FHVUT WGT OF PLATES FORM 2290	TITLE PENALTY \$
	NOTARY PUBLIC SIGNATURE		MY COMMISSION EXPIRES	<input type="checkbox"/> PP <input type="checkbox"/> EIN <input type="checkbox"/> FMCSA	OLDEST AMT \$
	NOTARY PUBLIC NAME (TYPED OR PRINTED)		<input type="checkbox"/> SAFETY <input type="checkbox"/> EDUCATION	MILEAGE DATE	EXPEDITIOUS TITLE FEE \$

BRANCH OFFICE VALIDATION ONLY	FILE REFERENCE NUMBER		STATE TAX	S
			\$	U
	<input type="checkbox"/> APPROVE	SITE CODE	LOCAL TAX	
	<input type="checkbox"/> REJECT		\$	
	INS VERIFIED BY	AGENT FEE	TOTAL	
			\$	

STATE OF MISSOURI

CERTIFICATE OF TITLE
ORIGINAL

05440KJ071

TITLE NUMBER
AR309794VEHICLE IDENTIFICATION NUMBER
10603221YEAR
77MAKE
REDMMODEL
REDMBODY STYLE
MFGHM

FUEL

CYL

HP

PREVIOUS STATE

MILEAGE AT TIME OF TRANSFER

*

TAX
PAIDPURCHASE DATE
04/30/90DATE ISSUED
06/19/90

OWNER

ENDRASKE SUSAN M & DALE J
13 COACH COURT
ST PETERS MO 63376

MAIL TO

WINFIELD BANKING COM
PO BOX 117
WINFIELD MO 63389

VEHICLE SUBJECT TO FOLLOWING LIEN(S)

RELEASE OF LIEN: The holder of the lien on the vehicle described in this certificate of title does hereby state that the lien described in said certificate of title is released and discharged.

FIRST LIEN

WINFIELD BANKING COM
PO BOX 117
WINFIELD
MO 63389LIEN DATE
04/30/90

NAME OF FIRM

SIGNATURE OF AUTHORIZED AGENT

DATE RELEASED

NAME OF FIRM

SIGNATURE OF AUTHORIZED AGENT

DATE RELEASED:

MILEAGE STATEMENT

*EXEMPT FROM MILEAGE REQUIREMENTS

MO 860-0331 (11-89) C11417424

DOR-Benton
DIRECTOR OF REVENUE

DOR-387 (11-89)

ANY ALTERATION OR ERASURE VOIDS THIS TITLE

INSTRUCTIONS: Federal law requires that all sales of firearms require the purchaser to pay the full purchase price at the time of sale. If applicable, it requires that all sales of firearms require the purchaser to pay the full purchase price at the time of sale. The purchaser must also provide a valid form of identification. The purchaser must also provide a valid form of identification. The purchaser must also provide a valid form of identification.

COH-287 (11-68)

Handwritten signature: J. Howard Deane
Date: 7/11/02

509952 1081012525 100 009 0

Cashier's Check

Pay to the order of **SUSAN PICCININO**

SIX THOUSAND NINE HUNDRED FIFTY DOLLARS & 00/100 *****

\$ **6,950.00**

REMITTER **ST. JOHN'S ROCK ROAD TRAILER**

ST. JOHN'S

BANK & TRUST COMPANY, ST. LOUIS, MO.

No. **509952** DATE **04-11-2000**

NOTICE TO CUSTOMER: THE PURCHASE OF AN INDEMNITY BOND WILL BE REQUIRED BEFORE AN OFFICIAL CHECK OF THIS BANK WILL BE REPLACED IN THE EVENT IT IS LOST, STOLEN OR MISPLACED.



OCK ROAD TRAILER
25 ST. CHARLES ROCK RD.
BRIDGETON, MO. 63044

Dealers Title Service
P.O. Box 1026
210 E. Dunklin
Jefferson City, Mo. 65101

ROCK ROAD TRAILER PARTS & SALES, INC. 12725 ST. CHARLES ROCK ROAD 314 239-5775 BRIDGETON, MO. 63044		19805
PAY TO THE ORDER OF	<i>Dealers Title Service</i>	DATE <i>4-11-00</i>
ROCK ROAD TRAILER		\$ <i>16.50</i>
I <i>16</i> DOLLARS		DOLLARS
FOR <i>Title fee 1977 Redmond Rose M. Bupp See</i>		
⑈019805⑈ ⑈081012575⑈ 371 325 0⑈		

Service List for
Case No. MC-2000-397
May 10, 2000

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Loyd Biggs
Rock Road Trailer Parts & Sales
12725 St. Charles Rock Road
Bridgeton, MO 63044

James W. Gallaher
515 East High St.
P.O. Box 28
Jefferson City, MO 65102