

Elliott Hedin

From: Svcollect@aol.com
Sent: Friday, June 11, 2004 1:54 PM
To: Elliott Hedin
Subject: Response to Interrogatories

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

| | | |
|--|---|---------------------------|
| SUSAN VINEYARD, |) | |
| |) | |
| Complainant, |) | |
| |) | |
| v. |) | Docket No: 04-0094 |
| |) | |
| CENTRAL ILLINOIS PUBLIC SERVICE |) | |
| COMPANY d/b/a AmerenCIPS, |) | |
| |) | |
| Respondent. |) | |

RESPONDENT'S REQUEST FOR CLARIFICATION OF COMPLAINANT'S RESPONSE TO INTERROGATORIES

NOW COMES Respondent Central Illinois Public Service Company d/b/a AmerenCIPS ("CIPS"), by and through its attorneys, Brown, Hay & Stephens, LLP and Elliott M. Hedin, and for its request for clarification of Complainant's answers to certain interrogatories, states as follows:

1. In your answer to Interrogatory No. 3, you state that you own 301 E Oak, but in your answer to

9/10/2004

Interrogatory No. 16, you state that the Gallo Nero Land Trust owns 301 E. Oak. Explain your answers to Interrogatories No. 3 and No. 16.

- a. **301 East Oak Street is owned by the GALLO NERO LAND TRUST. SUSAN VINEYARD is owner of the beneficial interest of GNLT. SUSAN VINEYARD mis-stated that GNLT owned 1 East Poplar Street. That property was foreclosed in February 2003.**

2. In your answers to Interrogatories No. 6 and No. 9, you state that you are self-employed by Vineyard Collection Co., but you failed to provide any further elaboration with regard to this employment. Describe the nature and scope of your responsibilities with Vineyard Collection Co., state the address of Vineyard Collection Co., the nature of your ownership interest, and how and when you draw money from it.

- a. **P O BOX 274**

CAPE GIRARDEAU, MISSOURI 63702

2020 Cliff Drive # 357

SANTA BARBARA, CALIFORNIA 93109

77.5 Carretera Tijuana-Cabo San Lucas TH # 7

Tijuana, B.C. MEXICO

100% OWNERSHIP; I DRAW MONEY WHEN MONEY IS AVAILABLE TO PAY MY BILLS. NO SET TIME. NO SET AMOUNT.