

5. "Kurtis J. Kintzel has been Chairman of the Board of BOI from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

6. "Kurtis J. Kintzel is BOI's president."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

7. "Kurtis J. Kintzel has been BOI's president during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

8. "Kurtis J. Kintzel holds a 72 percent equity interest in BOI."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

9. "Kurtis J. Kintzel has held a majority equity interest in BOI from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

10. "You are BOI's Secretary/Treasurer."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

11. "You have been been BOI's Secretary/Treasurer during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

12. "You are a director of BOL"

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

13. "You have been a director of BOI during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

14. "You hold a 26 percent equity interest in BOI."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

15. "You have held a minority equity interest in BOI from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

16. "Kurtis J. Kintzel is Buzz's Chairman of the Board."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

17. "Kurtis J. Kintzel has been Chairman of the Board of Buzz Telecom from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

18. "Kurtis J. Kintzel has been President of Buzz during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

19. "Kurtis Kintzel is a director of Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

20. "Kurtis Kintzel has been a director of Buzz during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

21. "Kurtis J. Kintzel holds a 72 percent equity interest in Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

22. "Kurtis J. Kintzel has held a majority equity interest in Buzz from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

23. "You are Buzz's Secretary."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

24. "You have been Secretary of Buzz Telecom from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

25. "You are a director of Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

26. "You have been a director of Buzz during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

27. "You hold a 26 percent equity interest in Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

28. "You have held a minority equity interest in Buzz from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

29. "Kurtis J. Kintzel holds a 72 percent equity interest in Avatar."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

30. "Kurtis J. Kintzel has held a majority equity interest in Avatar from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

31. "You are a director of Avatar."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

32. "You have been a director of Avatar during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

33. "You hold a 26 percent equity interest in Avatar."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

34. "You have held a minority equity interest in Avatar from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

35. "You and Kurtis J. Kintzel are brothers."

Answer: Objection; the question is irrelevant. The Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper.

36. "Kurtis J. Kintzel is responsible for overseeing the financial management of BOI."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

37. "Kurtis J. Kintzel has been responsible for overseeing the financial management of BOI during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

38. "You are responsible for overseeing the day-to-day activities of BOI."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

39. "You have been responsible for overseeing the day-to-day activities of BOI during the period February 11, 2004 through November 2006."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

40. "You have been responsible for overseeing the day-to-day activities of BOI during the period December 2006 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

41. "Kurtis J. Kintzel is responsible for overseeing the financial management of Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

42. "Kurtis J. Kintzel has been responsible for overseeing the financial management of Buzz during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

43. "Kurtis J. Kintzel is responsible for overseeing the regulatory compliance of Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

44. "Kurtis J. Kintzel has been responsible for overseeing the regulatory compliance of Buzz during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

45. "Kurtis J. Kintzel is responsible for overseeing the regulatory compliance of Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

46. "Kurtis J. Kintzel has been responsible for overseeing the regulatory compliance of Buzz during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

47. "You are responsible for overseeing the day-to-day activities of Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

48. "You have been responsible for overseeing the day-to-day activities of Buzz during the period February 11, 2004 through November 2006."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

49. "You have been responsible for overseeing the day-to-day activities of Buzz during the period December 2006 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

50. "Kurtis J. Kintzel had to approve all scripts used by telemarketers to market Buzz during the period February 11, 2004 through November 2006."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

51. "Kurtis J. Kintzel has had to approve all scripts used by telemarketers to market Buzz during the period December 2006 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

52. "You reviewed all scripts used by telemarketers to market Buzz during the period February 11, 2004 through November 2006."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify

*piercing the corporate veil under existing law, or that would otherwise make the question proper.*

The question should be directed to the corporation.

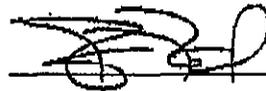
53. "You have reviewed all scripts used by telemarketers to market Buzz during the period December 2006 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper.

The question should be directed to the corporation.

**SWORN STATEMENT**

I hereby declare under penalty of perjury that the information supplied in the foregoing Answers is true to the best of my knowledge, information, and belief. The word choice and sentence structure may be those of the attorney and does not purport to be that of the executing parties. Discovery is not complete; the parties reserve the right to supplement their Answers if additional information comes to their attention.

 NOV 9, 2007

Keanan Kintzel

Catherine Park 11/11/07

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**Certificate of Service**

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent for filing on this 14<sup>th</sup> day of November 2007, by hand delivery, to the following:

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, NE  
Suite 110  
Washington, D.C. 20002

And served by U.S. Mail, First Class, on the following:

Richard L. Sippel, Chief Administrative Law Judge  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 1-C861  
Washington, D.C. 20554

Hillary DeNigro, Chief  
Michele Levy Berlove, Attorney  
Investigations & Hearings Division, Enforcement Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 4-C330  
Washington, D.C. 20554

*Catherine Park*

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Catherine Park

**CERTIFICATE OF SERVICE**

Rebecca Lockhart, a Paralegal Specialist in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has, on this 4th day of December, 2007, sent by first class United States mail copies of the foregoing **Enforcement Bureau's Motion for Ruling on Objections by Kurtis J. Kintzel and Keanan Kintzel to Request for Admissions of Fact and Genuineness of Documents** to:

Catherine Park, Esq.  
2300 M Street, NW, Suite 800  
Washington, D.C. 20037

Counsel for Kurtis J. Kintzel, Keanan Kintzel, Business Options, Inc.,  
Buzz Telecom Corporation, US Bell, Inc., Link Technologies and  
Avatar Enterprises

A copy of the foregoing was also served via hand-delivery to:

Administrative Law Judge Richard L. Sippel  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 1-C861  
Washington, D.C. 20054

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Rebecca Lockhart