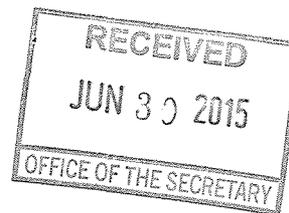


HARD COPY

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8 *Attorneys for Wolverine Holding Corp. (a/k/a Mobility Plus Medical Equipment, Inc.)*

9 ADMINISTRATIVE PROCEEDINGS

10 Before the

11 UNITED STATES SECURITIES AND EXCHANGE COMMISSION

| | | | |
|----|--|---|--|
| 12 | <i>In the Matter of Oraco Resources, Inc., et al.,</i> |) | Case No. 3-16596 (Securities Exchange Act of 1934 Release No. 75183/June 17, 2015) |
| 13 | Respondents. |) | ANSWER OF RESPONDENT MOBILITY PLUS MEDICAL EQUIPMENT, INC. TO ORDER INSTITUTING ADMINISTRATIVE PROCEEDINGS PURSUANT TO SECTION 12 (j) OF THE SECURITIES EXCHANGE ACT OF 1934 |

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18 PLEASE TAKE NOTICE that Respondent Wolverine Holding Corp., a/k/a Mobility Plus
19 Medical Equipment, Inc. (“Mobility”), hereby answers, as provided by Rule 220(b) of the Rules
20 of Practice of the U.S. Securities and Exchange Commission (the “Commission”)[17 C.F.R. Sec.
21 201.220(b)], the Commission’s order dated June 17, 2015 (the “Order”) instituting administrative
22 proceedings pursuant to Section 12(j) of the Securities Exchange Act of 1934 (the “Exchange
23 Act”) against Mobility, among other respondents of the Order (collectively, the “Respondents”),
24 as follows:
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27 /

KRUEGER LLP

ANSWER TO SPECIFIC ALLEGATIONS

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Mobility, by its undersigned counsel, hereby answers the specific allegations set forth in the Order as follows:

1. Mobility does not have, and is unable to obtain, sufficient information to admit or deny the allegations contained in Section II, Paragraph One of the Order.

2. Mobility does not have, and is unable to obtain, sufficient information to admit or deny the allegations contained in Section II, Paragraph Two of the Order.

3. Mobility does not have, and is unable to obtain, sufficient information to admit or deny the allegations contained in Section II, Paragraph Three of the Order.

4. Mobility does not have, and is unable to obtain, sufficient information to admit or deny the allegations contained in Section II, Paragraph Four of the Order.

5. As to Section II, Paragraph Five, Mobility admits that it is a Delaware corporation with a class of securities registered with the Commission pursuant to the Exchange Act. Mobility denies that it is based in Smyrna, Georgia. Mobility admits that the common stock of Mobility as of June 15, 2015 was quoted on OTC Link, had four market makers, and was eligible for the "Piggyback" exception of Exchange Act Rule 15c2-11(f)(3). Mobility's new officers and board of directors, who were designated in 2015, do not have, and are unable to obtain, sufficient information to admit or deny the other allegations contained in Paragraph Five of the Order.

6. Mobility denies the allegations contained in Section II, Paragraph Six of the Order as to Mobility. Mobility does not have, and is unable to obtain, sufficient information to admit or deny the other allegations contained in Paragraph Six of the Order as to the other Respondents.

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FIRST AFFIRMATIVE DEFENSE

The Order, and each allegation contained in the Order, fails to state a claim upon which relief can be granted against Mobility.

SECOND AFFIRMATIVE DEFENSE

The Commission's claims against Mobility are barred or limited because Mobility's conduct was justified by legitimate business motives, purposes and reasons, which were well informed or reasonable under the circumstances, and of which the Commission was fully aware, including the Commission's complete and total awareness at all times alleged in the Order of the true financial condition, operations, management and activities of Mobility and all of its business and financial matters.

THIRD AFFIRMATIVE DEFENSE

The Commission's claims against Mobility are barred or limited because any damages suffered were solely the result of the actions or failures to act by others, and not as a result of any action or omission by Mobility under federal securities laws.

FOURTH AFFIRMATIVE DEFENSE

The Commission's claims against Mobility are barred in whole or in part because the claims against Mobility are barred by the doctrine of waiver.

FIFTH AFFIRMATIVE DEFENSE

The Commission's claims against Mobility are barred by the doctrine of estoppel.

SIXTH AFFIRMATIVE DEFENSE

The Commission's claims against Mobility are barred by the doctrine of laches.

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1. that the Order against Mobility be vacated;
2. that judgment be entered in favor of Mobility;
3. that the decision to be rendered by the Administrative Law Judge (this "Court") be in favor of Mobility; and
4. that the Commission be assessed with all costs of this action, including reasonable attorneys' fees of Mobility; and
5. that Mobility have such other relief as this Court deems proper.

Dated: June 24, 2015

Respectfully submitted,

KRUEGER LLP



Blair Krueger, Esq.
Krueger LLP

Special Counsel and Attorneys for Wolverine Holding Corp. (a/k/a Mobility Plus Medical Equipment, Inc.)



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 F Street, N.E. - Room 6104 - Stop 6010
Washington, D.C. 20549-6010

David S. Frye
Senior Counsel

Direct Dial: 202-551-4728
Facsimile: 202-772-9366
E-mail: fryed@sec.gov

June 17, 2015

BY PRIORITY MAIL EXPRESS

Wolverine Holding Corp. (a/k/a Mobility Plus Medical Equipment, Inc.)
9830 Sixth Street, Suite 103
Rancho Cucamonga, CA 91730

Re: *In the Matter of Oraco Resources, Inc., et al.*

Dear Sir or Madam:

Pursuant to SEC Rule of Practice § 201.230, documents related to this matter are available for inspection and copying at the Securities and Exchange Commission's headquarters in Washington, D.C. Please note, however, that pursuant to SEC Rule of Practice § 201.230(f), a respondent in an SEC proceeding is responsible for bearing the cost of copying. If you wish to make arrangements for such inspection and copying, please call me at (202) 551-4728.

Sincerely,

A handwritten signature in black ink, appearing to read "David S. Frye".

David S. Frye
Senior Counsel

Enclosures