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June 18, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

RE: Mohamed Mansaray v. PECO Energy Company
PUC Docket No.: C-2013-2352692

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's Additional Reply Exceptions* with regard to the matter referenced above.

I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties. Thank you for your time and attention on this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Shawane Lee", with a long, sweeping underline.

Shawane Lee
Counsel for PECO Energy Company

s/LO

ADDITIONAL REPLY EXCEPTIONS

PECO Energy Company (“PECO Energy”) hereby files an additional response to the Exceptions filed by Mohamed Mansaray (“Complainant”) in the above-referenced matter on April 10, 2014. The Exceptions concern whether the Complainant required a Mandigo interpreter at the hearing held before Administrative Law Judge Eranda Vero on August 15, 2014. A hearing was initially held before Administrative Law Judge Eranda Vero on June 7, 2013. At the hearing, the Complainant raised for the first time his requirement for a Mandigo interpreter.¹ PECO Energy objected to Mr. Mansaray’s request because the Hearing Notice issued on April 4, 2013, clearly stated that if the Complainant required an interpreter, he should contact the Public Utility Commission (“PUC”) at least ten (10) days before the hearing. Nevertheless, ALJ Vero continued the hearing to August 14, 2013, to obtain a Mandigo interpreter.

The day of the August 14, 2013, hearing, the PUC obtained the service of a translating company but the company did not have a Mandigo interpreter available. PECO Energy objected to any additional continuances of the case and argued that the Complainant could speak English and was pretending that he could not as a ploy to avoid adjudicating the formal complaint to delay collection on the balance. ALJ Vero proceeded with the hearing and the Complainant was able to put on his case. ALJ Vero issued an Initial Decision on December 18, 2013, wherein she dismissed the formal Complaint against PECO Energy.

PECO Energy files this additional response to the Complainant’s Exceptions in support of the company’s argument that the Complainant was not being forthright regarding his ability to

¹ As of 1970, there were approximately 4.2 million speakers of the Mandigo language, primarily living in West Africa. <http://encyclopedia2.thefreedictionary.com/Mandingo>. This is not a standard language spoken in the United States with Mandigo translators readily available.

speak English. Enclosed is a newspaper article from the Philadelphia Daily News published on June 17, 2014. The article indicates that the Complainant has been indicted for fraudulently using the social security numbers and identities of foster and disabled children on tax returns. The Complainant is expected to plead guilty next week. The article indicates that the Complainant worked as a tax preparer and prepared false income-tax returns. PECO Energy avers that the fraud charges against the Complainant support PECO's contention that the Complainant used a ploy to avoid his hearing by contending he could not speak English and thus avoid paying his PECO charges.

PECO Energy avers that the company and its ratepayers will be severely prejudiced if the Complainant is permitted to have another hearing arising from his allegation that he requires an interpreter. ALJ Vero's decision to dismiss the Complainant's case against PECO Energy should be upheld. For the reasons set forth above, PECO respectfully requests that the Commission deny the Exceptions and issue an Order upholding the Initial Decision in its entirety.

Respectfully submitted,



Shawane L. Lee
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MOHAMED MANSARAY

COMPLAINANT

v.

PECO ENERGY COMPANY,

RESPONDENT

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Docket Nos. C-2013-2352692

CERTIFICATE OF SERVICE

I, Shawane L. Lee, hereby certify that I have this day served a true copy of the foregoing Additional Reply Exceptions upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**Mohamed Mansaray
4419 Frankford Avenue
Philadelphia, PA 19124**

Dated at Philadelphia, Pennsylvania, June 18, 2014



Shawane L. Lee
Counsel for PECO Energy Company
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Guilty plea for tax preparer?

He is 9th charged in alleged scam

BY JULIE SHAW

Daily News Staff Writer
shawj@phillynews.com, 215-864-2592

A NINTH PERSON charged in a case involving a Southwest Philadelphia tax company accused of fraudulently using the identities of foster and disabled kids on tax returns may plead guilty next week.

Mohamed Conteh, of Collingdale, Delaware County, has a plea hearing slated for June 25 before U.S. District Judge Legrome Davis, according to an entry filed yesterday in his court docket. Conteh had worked as a tax pre-

parer at Medmans Financial Services at its Woodland Avenue office, near 66th Street.

The U.S. Attorney's Office last Thursday announced the unsealing of an indictment against six defendants in the Medmans case. Five worked at Medmans as tax preparers. Three of the five also worked at the Main Line-based Derveraux Foundation, providing care for kids with disabilities.

The sixth defendant worked at Catholic Social Services, where he had access to foster kids' names, dates of birth and Social Security numbers.

The defendants were accused of conspiring to falsely use the

identities of the foster and disabled kids on tax returns by listing them as dependents on clients' income-tax returns. By doing so, the tax preparers allegedly claimed false credits and generated large fraudulent refunds for their clients. In some cases, the defendants allegedly falsely claimed dependents on their own tax returns as well.

Their indictment indicated that the owner of Medmans, Mohamed Mansaray, had also been charged in the case. He was charged in May 2013 by criminal information, which typically indicates a guilty plea is in the works.

Court documents in Mansaray's case noted that another defendant, Shirl Robinson, was previously indicted in the case. Rob-

inson, who was accused of selling names, dates of birth and Social Security numbers of kids to Mansaray for use as false dependents on tax returns, has already pleaded guilty.

Yesterday, an IRS spokeswoman, Neeka Sutherland, told the Daily News that a ninth person — Conteh — was also charged in the case.

Conteh was charged by criminal information in May 2013. He is accused of falsely listing a dependent each on three customers' returns when they "had no legitimate dependent to claim."

He is charged with three felony counts of aiding in the preparation of false income-tax returns.

His attorney, Lawrence Singer, would not confirm yesterday

whether his client would plead guilty next week, instead saying, "We have a hearing scheduled."

Conteh "was [responsible for] filling out the returns, not obtaining the Social Security numbers," Singer said.

Singer said Conteh now works at a place where he takes care of disabled adults in a group home. He believes Conteh does not have access to the adults' Social Security numbers.

"He's never been in trouble with the law before," Singer said.

The six defendants whose indictment was unsealed Thursday were Ahmed Kamara, Rodney Mansaray, Gebah Kamara, Dawda Koroma, Ibrahim Kamara and Musa Turay.

Some of the defendants may be distant relatives, a prosecutor has said.

■ @juliesthawphilly