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PA P.U.C.
SECRETARY'S BUREAU

Shariff Ingram
DV-6749
SCI Fayette
Box 9999
LaBelle Pa 15450

February 9, 2017

Rosemary Chiavette, Secretary
Pennsylvania Public utility Commission
Commonwealth Keyston Building
400 North Street, 2nd Floor North
P.O. Bo 3265
Harrisburg Pa 17105-3265

RE: Shariff Ingram V Securus Technologies Inc. Docket No. C-2016-2573790

COMPLAINANT'S OBJECTION TO SECURUS OBJECTION TO THE
APPLICATION FOR SUBPOENA

Dear Secretary:

Please find the filing with the Commission, Complainant objection to Securus objection to the Application for subpoena. A copy was served in accordance with the attached certificate of service.

Please contact me if you have any questions concerning this filing.

CC: Honorable Dennis J Buckley
Administrative Law Judge
per certificate of service

Sincerely, *Shariff Ingram*

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
2017 FEB 13 AM 10:50

Administrative Law Judge
Dennis J. Buckley

PA P.U.C.
SECRETARY'S BUREAU

Shariff Ingram :
Complainant :

V Docket No. C-2016-2573790

Securus technologies Inc :
Respondent :
:

COMPLAINANT'S OBJECTION TO SECURUS
TECHNOLOGIES OBJECTION CONCERNING
COMPLAINANTS APPLICATION FOR SUBPOENA

Complainant, Shariff Ingram pursuant to 52 Pa Code 5.421 hereby objects to Securus technologies objection to Complainant's application for subpoena filed on January 20, 2017. In support thereof Complainant avers as follows:

1) Complainant filed a application for subpoena for witness who are needed for the hearing dated February 16, 2017 at 10:00 am before the Honorable Administrative Law Judge.

2) Securus Technologies filed an objection to the application on February 2, 2017 stating that there is no need for (2) of the witness mentioned in Complainant's application for subpoena, Ms Donna Gibson (Securus on site phone rep at SCI Fayette): Mr. Cutis Hopfinger (Director of Regulatory affairs)

3) As mentioned in the application for subpoena, on page 3, paragraph 7, Ms Gibson testimony is highly relevant concerning the grievance that Complainant filed regarding what was said, that Securus did not provide any (60) day notice that there will be a 5% GRT going into effect. Ms. Gibson can explain when this notice was issued to the housing units, and when Securus actually issued it to her. Her testimony help Complainant sustain his burden of proof that Securus lied about the notice being posted (60) days in advance, and will show that Securus is engaging

in deceptive and misleading practice in violation of this Commission rules and regulations.

4) Next, Securus is claiming that they have no control over Mr. Salkowski and therefore, cannot compel his participation as a witness (page 2, paragraph 6 of Securus objection to the application for subpoena) Complainant is asking the Commission to subpoena Mr. Salkowski, not Securus. As mentioned in the application for subpoena filed by the Complainant on page 3, paragraph Mr Salkowski testimony is also highly relevant concerning the collection of the 5% GRT from Securus, and the 6% sales tax from Pennsylvania inmates. Mr. Salkowski can explain what percentage is being paid to the Pennsylvania Department of Revenue from these collections, and, how long each inmate will have to pay the 5% GRT for each call they make. Mr. Salkowski testimony will help Complainant sustain his burden of proof that inmates are being double taxed, and that the 5% GRT should not be imposed on inmates.

5) This objection from Complainat is not being filed to delay the proceeding, nor is the application for subpoena being used for a "fishing expedition" but is only ment to help Complaiant sustain his burden of proof. The witness mentioned, Ms. Gibson, Ms. Davis, and Mr. Hopfinger work for Securus Technologies, and should be called to testify concerning their involmment of this complaint. Complainant is not trying to cause unreasonable annoyance, or burden and expense to Securus, Complaiant is trying to establish his burden of proof as required by 66 Pa C.S. 332(a)

WHEREFORE, Complainant respectfully request that the application for subpoena be granted with respect to the witness mentioned and subpoena be issued for the hearing schedule on February 16, 2017 at 10:00 am

Respectfully Submitted,

DATE 2/7/17

/s/ Shariff Ingram
Shariff Ingram

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the "OBJECTION TO SECURUS OBJECTION TO THE APPLICATION FOR SUBPOENA", upon the party listed below, in accordance with the requirement of 52 Pa Code 1.54.

COZEN O'CONNOR
David P. Zambito ESQ
17 North Second Street
Suite 1410
Harrisburg Pa 17101

DATE 2/17/17

/s/ Shariff Ingram
Shariff Ingram

Shariff Ingram # DV-6749

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LaBelle, PA 15450-0999

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