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Garrett P. Lent

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File #: 167945

March 6, 2019

VIA ELECTRONIC FILING

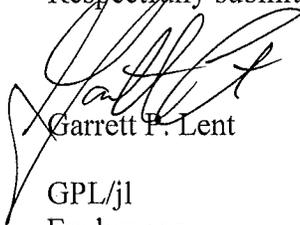
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Nelson Hess v. PPL Electric Utilities Corporation
Docket No. C-2018-3003337

Dear Secretary Chiavetta:

Enclosed for filing is the Motion of PPL Electric Utilities Corporation to Compel Responses to Discovery Propounded on Nelson Hess – Set I in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Garrett P. Lent

GPL/jl
Enclosures

cc: Honorable Elizabeth Barnes
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

Nelson Hess
2408 Crow Foot Drive
Auburn, PA 17922
E-mail: nelsonhess@gmail.com

Date: March 6, 2019



Garrett P. Lent

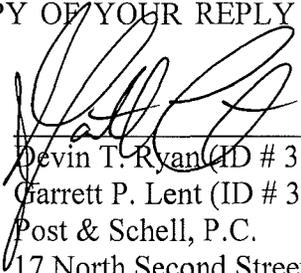
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Nelson Hess,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2018-3003337
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

Kimberly A. Klock (ID # 89716)
Michael J. Shafer (ID # 205681)
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
Phone: 610-774-4254
Fax: 610-774-4102
E-mail: kklock@pplweb.com
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Devin T. Ryan (ID # 316602)
Garrett P. Lent (ID # 321566)
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Curtis S. Renner (DC ID # 446187)
Watson & Renner
1101 14th Street, NW
Suite 350 - ENS
Washington, DC 20005
(202) 737 6302
crenner@w-r.com

Date: March 6, 2019

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Nelson Hess,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2018-3003337
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**MOTION OF PPL ELECTRIC UTILITIES CORPORATION TO
COMPEL RESPONSES TO
DISCOVERY PROPOUNDED ON NELSON HESS – SET I**

TO ADMINISTRATIVE LAW JUDGE ELIZABETH H. BARNES:

Pursuant to 52 Pa. Code §§ 5.342(g) and 5.349(d), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Motion to Dismiss Objections and Compel Responses to Discovery Propounded on Nelson Hess (“Complainant”) – Set I. In support of its Motion, PPL Electric states as follows:

I. INTRODUCTION

1. On February 14, 2019, PPL Electric served Interrogatories and Requests for Production of Documents on the Complainant – Set I (“PPL to Complainant Set I”) via email and first class mail. A true and correct copy of PPL to Complainant Set I is attached hereto and marked as **Appendix A**.

2. Pursuant to the Commission’s regulations, objections to PPL to Complainant Set I were due on or before February 25, 2019, and responses were due on or before March 6, 2019.

3. Complainant did not serve any objections to PPL to Complainant Set I.

4. Mr. Hess timely served his responses to PPL to Complainant Set I on March 1, 2019. A true and correct copy of PPL to Complainant Set I is attached hereto and marked as **Appendix B.**

5. Complainant is required to serve any statements, reports and direct testimony of any expert witness he intends to call on or before March 12, 2019. The Company is required to serve its direct testimony in this case on or before April 12, 2019.

6. For the reasons explained below, PPL Electric respectfully requests that Administrative Law Judge Elizabeth H. Barnes (the "ALJ") compel full responses to PPL to Complainant Set I, Questions 3 and 4 discovery requests.

II. MOTION TO COMPEL

7. PPL Electric requests that the ALJ compel a response to PPL to Complainant Set I, Question 3.

8. Under 52 Pa. Code § 5.321(c), a party is entitled to obtain discovery of any matter not privileged that is relevant to the pending proceeding, or any matter that is reasonably calculated to lead to the discovery of admissible evidence. Discovery is permitted regardless of whether the information sought "relates to the claim or defense of the party seeking discovery or to the claim or defense of another party." *Id.*

9. Objections to interrogatories and requests for production of documents must be served within 10 days of the date the discovery was served. 52 Pa. Code §§ 5.342(e), 5.349(d). Objecting parties remain under an obligation to provide timely answers to interrogatories or

subparts of interrogatories to which they did not object. *Id.* § 5.342(f). Further, objections must be contained in a document separate from an answer. *Id.* §§ 5.342(c), 5.349(d).¹

10. Answers to written interrogatories must “[a]nswer each interrogatory fully and completely unless an objection is made.” *Id.* § 5.342(a)(4). Answers must be served within 20 days after service of the interrogatories. *Id.* § 5.342(d).

11. Similarly, a party shall serve a response to a request for documents within 20 days after the service of the request. *Id.* § 5.349(d). The requesting party may move to compel a response to a request for documents with respect to a failure to respond to the request. *See id.*

12. As explained herein, the Complainant has failed to comply with the Commission’s discovery rules by failing to provide a full and complete response to PPL to Complainants Set I, Question 3 and produce the documents sought by these requests.

13. For the reasons stated in more detail below, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Question 3. Moreover, should the ALJ grant PPL Electric’s Motion to Compel and the Complainant fail to timely provide a full and complete response to Complainant Set I, Questions 3, PPL Electric intends to file a Motion for Sanctions pursuant to 52 Pa. Code §§ 5.371(a), 5.372(a)(1), 5.372(a)(2).

14. PPL to Complainant-I-3 provides:

Please state whether you or any member of your household uses a cell phone. If so, please provide the make and model of each cell phone and, for each phone identified, provide 12 months of phone bills or other records of actual cell phone usage.

15. The Complainant’s response to the question states:

There is one cell phone (a Samsung Galaxie[sic] 8+) that is protected (and tested) with three different technologies including tin foil on the holder. I always use the speaker phone or text, never

¹ As seen in Appendix B, the Complainant did not serve objections to discovery. Therefore, Complainant’s failure to provide full and complete responses to discovery requests operate, in effect, as untimely objections.

hold it to my ear and never had in the past due to being so sensitive to the frequencies which cause me very bad headaches and blurred vision.

The response does not provide information about Complainant's amount of cell phone usage and does not provide the requested phone bills that would show the usage.

16. The Complainant's response to PPL to Complainant-I-3 is incomplete and, therefore, non-responsive. Importantly, the discovery request is reasonably narrow in its scope because it only asks for the cell phone usage, if any, by the members of the Complainant's household and documentation of their usage. Section 5.321(c) of the Commission's regulations specifically permits the discovery of "the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things" that are relevant to the proceeding. 52 Pa. Code § 5.321(c).

17. The information about Complainant's cell phone use is highly relevant to the issues raised in this case. Complainant claims that he is sensitive to RF fields produced by AMI meters and that his health is affected by RF fields. However, as the testimony of PPL Electric's expert witness on RF exposures – Dr. Davis – makes clear, the RF exposure received from use of a cell phone (or even standing within 30 feet of another person using a cell phone) is far higher than from an AMI meter. The Complainant voluntarily uses his Samsung Galaxy S8+ cell phone and experiences the RF exposure from his phone. PPL Electric is entitled to show how the RF exposures from that phone use compare to those from the AMI meter, and is entitled to discover the billing records needed to quantify the amount of time that Complainant chooses to use his phone.

18. Furthermore, the request is narrowly tailored to issues relevant to Complainant's claims about exposure to RF fields and is not burdensome. The Complainant admits to owning

a cell phone, so there is no reasonable basis to believe that he cannot readily access and print out the requested bills sought by this request.

19. By failing to provide “12 months of phone bills or other records of actual cell phone usage,” let alone object to this request, the Complainant would be deprived of the opportunity to analyze the Complainant’s exposure to RF fields by other devices in his possession. Therefore, at a minimum, the Complainant should be compelled to provide the requested documents and records so that the Company may address the Complainant’s existing exposure to RF transmission in its written testimony.

20. For these reasons, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Question 3.

III. NOTICE OF INTENT TO SEEK SANCTIONS

21. Upon the motion of a party, the presiding officer may make an appropriate order for sanctions if a party fails to answer or otherwise respond to a discovery request, or refused to obey an order of the presiding officer respecting discovery. *See* 52 Pa. Code § 5.371(a).

22. In ruling upon a motion for sanctions, the presiding officer may issue “[a]n order that the matters regarding which the questions were asked...the contents of the paper...shall be taken to be established for the purposes of the action in accordance with the claim of the party obtaining the order.” *Id.* § 5.372(a)(1). Or the presiding officer may issue “[a]n order refusing to allow the disobedient party to support or oppose designated claims or defenses, or prohibiting the party from introducing in evidence designated documents, things or testimony.” *Id.* § 5.372(a)(2).

23. Therefore, to the extent that this Motion is granted and the Complainant fails to answer fully PPL to Complainant Set I, Question 3, or otherwise comply with the ALJ’s order,

PPL Electric intends to file an appropriate Motion for Sanctions pursuant to 52 Pa. Code §§ 5.371(a), 5.372(a)(1), 5.372(a)(2).

IV. CONCLUSION

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Elizabeth H. Barnes grant this Motion to Compel Responses to Discovery and direct Nelson Hess to answer fully PPL to Complainant Set I, Questions 3, as described above within three (3) days from the date of the order.

Respectfully submitted,



Devin T. Ryan (ID # 316602)

Garrett P. Lent (ID # 321566)

Post & Schell, P.C.

17 North Second Street, 12th Floor

Harrisburg, PA 17101-1601

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PPL Services Corporation

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Curtis S. Renner (DC ID # 446187)

Watson & Renner

1101 14th Street, NW

Suite 350 - ENS

Washington, DC 20005

(202) 737 6302

crenner@w-r.com

Date: March 6, 2019

Attorneys for PPL Electric Utilities Corporation

APPENDIX A

Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Nelson Hess – Set I



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Devin Ryan

dryan@postschell.com
717-612-6052 Direct
717-731-1981 Direct Fax
File #: 167945

February 14, 2019

VIA E-MAIL & REGULAR MAIL

Nelson Hess
2408 Crow Foot Drive
Auburn, PA 17922

Re: Nelson Hess v. PPL Electric Utilities Corporation
Docket No. C-2018-3003337

Dear Mr. Hess:

Enclosed are the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Nelson Hess – Set I in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Please provide answers to the enclosed discovery within twenty (20) days of the date of service, pursuant to 52 Pa. Code § 5.342.

Sincerely,

A handwritten signature in black ink, appearing to be 'DR', with a long horizontal flourish extending to the left.

Devin Ryan

DTR/jl
Enclosures

cc: Rosemary Chiavetta, Secretary (*Letter & Certificate of Service Only*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

Nelson Hess
2408 Crow Foot Drive
Auburn, PA 17922
E-mail: nelsonhess@gmail.com

Date: February 14, 2019



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Nelson Hess,	:	
	:	
Complainant	:	
	:	
v.	:	Docket No. C-2018-3003337
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent	:	

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY
PPL ELECTRIC UTILITIES CORPORATION ON
NELSON HESS – SET I**

Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 *et seq.*, PPL Electric Utilities Corporation (“PPL Electric”) propounds the following Interrogatories and Requests for Production of Documents (hereinafter, “discovery requests”) on Nelson Hess (“Complainant”) – Set I.

INSTRUCTIONS AND DEFINITIONS

1. The “Responding Party,” “you,” or “your” means the party to which these discovery requests are propounded and/or all attorneys, agents, affiliates, subsidiaries, employees, consultants, members, constituents, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

4. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

5. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.).

In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these discovery requests to attach a copy of each such document to the answers hereto and reference said document in the particular interrogatory to which the document is responsive.

6. “Document” means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or

any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

7. "Communication" means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

8. "Date" means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

9. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

10. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

11. The answers provided to these discovery requests should first restate the question asked and identify the person(s) supplying the information.

12. In answering these discovery requests, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party's attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party's own knowledge. If any of the discovery requests cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party's inability to answer the remainder, and stating whatever information the Responding

Party has concerning the unanswered portions. If the Responding Party's answer is qualified in any particular, please set forth the details of such qualification.

13. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 5 and state the basis of the objection.

14. If the Responding Party objects to part of a discovery request and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that discovery request. If the Responding Party objects to the scope or time period of a discovery request and refuses to answer for that scope or time period, state the Responding Party's objection and answer the discovery request for the scope or time period that the Responding Party believes is appropriate.

15. If, in connection with a discovery request, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

16. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and (c) the basis on which the privilege or other protection from disclosure is claimed.

17. As set forth in 52 Pa. Code § 5.342(g), these discovery requests are continuing, and the Responding Party is obliged to change, supplement, and correct all answers given to conform to new or changing information.

18. "Formal Complaint" means the Formal Complaint filed by the Complainant at Docket No. C-2018-3003337.

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED ON
NELSON HESS – SET I**

PPL to Complainant-I-1

Re: Formal Complaint.

- (a) Please explain in detail the reasons why you are challenging the Company's installation of the new smart meter.
- (b) Please describe in detail all health concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (c) Please describe in detail all safety concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (d) Please describe in detail all privacy concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (e) Please describe in detail all reasons you believe the Company's new smart meter violates the law.

PPL to Complainant-I-2

Please identify all wireless phones, cellphones, microwaves, wireless routers, wifi networks, tablets, computers, Bluetooth speakers, wireless security systems, smart speakers (*e.g.*, Amazon Echo), garage door openers, baby monitors, and walkie talkies that are contained in or used in the house.

PPL to Complainant-I-3

Please state whether you or any member of your household uses a cell phone. If so, please provide the make and model of each cell phone and, for each phone identified, provide 12 months of phone bills or other records of actual cell phone usage.

PPL to Complainant-I-4

- (a) Please state every health condition you claim was caused by a smart meter or will be caused or worsened by the installation of PPL Electric's new smart meter.
- (b) Please provide the date that every health condition identified in subpart (a) began.

- (c) Please provide copies of all your medical records of every health condition identified in subpart (a).
- (d) For each alleged health condition that you do not have medical records for in response to subpart (c), please state whether such condition was diagnosed by a medical professional. If so, please provide the name, address, and telephone number of the medical professional and the date of the diagnosis.
- (e) For each of the alleged health conditions identified in subpart (a), please state whether you have been prescribed any therapy or treatment for the condition by a medical professional. If so, please identify the therapy or treatment, provide the name, address, and telephone number of the prescribing medical professional, and provide the date the therapy or treatment was prescribed.

PPL to Complainant-I-5

Please identify each person you plan to call as a fact witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
- (c) Provide the source(s) of information relied upon or referenced by the witness.

PPL to Complainant-I-6

Please identify each person you plan to call as an expert witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify;
- (c) Provide the source(s) of information relied upon or referenced by the witness; and
- (d) Provide a copy of the expert witness's current curriculum vitae.

PPL to Complainant-I-7

Please provide copies of all exhibits you intend to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of your direct case, please identify the witness who will be sponsoring the exhibit.

APPENDIX B

Responses of Nelson Hess to the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation – Set I

Nelson Hess
2408 Crow Foot Drive
Auburn, PA 17922
(516) 652-7002

March 01, 2019

Via Email and First Class Mail

Devin T. Ryan Esquire
Post & Schell, P.C.
17 North 2nd Street, 12th Floor
Harrisburg, PA 17101-1601

**Re: Nelson Hess v. PPL Electric Utilities Corporation
Docket No. C-2018-3003337**

Dear Mr. Ryan:

I am enclosing the Interrogatories as requested.

Sincerely,



Nelson Hess

cc: Rosemary Chiavetta, Secretary (*Letter & Certificate of Service Only*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Nelson Hess

:
:
:
:
:

v.

C-2018-3003337

PPL Electric Utilities Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of an amended Formal Complaint for Docket No. C-2018-3003337 upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by First Class Mail, postage prepaid, as follows:

Devin T. Ryan Esquire
Post & Schell, P.C.
17 North 2nd Street, 12th Floor
Harrisburg, PA 17101-1601

Dated March 01, 2019



Nelson Hess
2408 Crow Foot Drive
Auburn, PA 17922
(516) 652-7002

Nelson Hess v. PPL Electric Utilities Corporation

Docket No. C-2018-3003337

INTERROGATORIES

1-1

Re: Formal Complaint.

- (a) I am challenging the PPL's installation of the new smart meter due to my extreme sensitivity to the radio frequencies that they emit, it's an unconstitutional surveillance device and that my personal data will be sold. Due to my protection procedures, my house is currently within safe levels of radiation without a smart meter installed. The installation of a smart meter would be bombarding me with unhealthy radiation that would be outside of my control. I could also not control the surveillance aspect or the sale of my personal data. And then there is the safety aspect which would be outside of my control.
- (b) My health concerns are the short term and the long term effects of being bombarded by these unhealthy frequencies even while I am sleeping. The basis for this claim is that there is no long term study that proves that the new Smart Meters are not detrimental to my health.
- (c) My safety concern for PPL's new smart meter is the chance of fire or damage to my appliances, property, etc. Various fires were caused by these new smart meters but get fixed quickly and the news does not get to (or will not) report on them.
- (d) My privacy concerns are the chance that PPL's new meters could be easily hacked. Read the news about the many hacking situations that are being reported and many go unreported. Also my personal data is not to be sold without my permission.
- (e) The new smart meters of PPL violates the law (Act 129) if forced upon a consumer. Act 129 was intended to be an opt-in to those who want or request a new smart meter.

1-2

There are no wireless telephones in my house.

There is one cell phone that is protected with three different technologies including tin foil on the holder to help block the incoming signal. I put it on airplane mode a lot. I always use the speaker phone or text. I never hold it close to my head or near my ear and had not in the past due to being so sensitive to the frequencies which cause me very bad headaches and blurred vision.

There is one microwave oven that is built into the kitchen which I have never used and is unplugged.

I have one router with the wifi turned off. If I need to use the wifi momentarily I wrap it in four layers of thick foil from an emergency tent and put shungite on it, etc. to block 95 percent of unhealthy frequencies.

I have no wifi networks.

I have two computers that are hard wired and are tested for any unhealthy frequencies.

I have one Bluetooth speaker and again used very little but heavily protected.

I have no wireless security monitors.

I do not and would not have any smart speakers such as Alexia, Amazon Echo, etc.

I have a garage door opener which is a very low frequency transmission.

I have no baby monitors.

I have no walkie talkie in or used in my house.

1-3

There is one cell phone (a Samsung Galaxie 8+) that is protected (and tested) with three different technologies including tin foil on the holder. I always use the speaker phone or text, never hold it to my ear and never had in the past due to being so sensitive to the frequencies which cause me very bad headaches and blurred vision.

1-4

- (a) A new smart meter will cause severe headaches, tightness in my chest, concentration issues, central nervous issues, etc...
- (b) My health conditions began 10-15 years ago with the advent of easy-pass, wifi while shopping, dining out, visiting and lodging. Most recently while visiting my sister after the installation of a Smart Meter.
- (c) It is impossible to document such conditions while in a doctor's office when you are away from the sources of EMF. I had to take a wifi-enabled bus recently and suffered greatly. I did not have my doctor with me to evaluate the situation.
- (d) See Dr. Brzozowski report.
- (e) See Dr. Brzozowski report that is clearly against the installation of a smart meter. By taking medication would only cause side effects such as more headaches, dizzy and nausea and would not be fixing the problem. I cannot take many medications due the side effects.

1-5

- (a) No known witness at this time.
- (b) No acquired witness.
- (c) No witness.

1-6

- (a) No witness.
- (b) No witness.
- (c) No witness.
- (d) No witness.

1-7

No exhibits are known at this time.



AFTER VISIT SUMMARY

Nelson Hess DoB: 2/20/1957

8/9/2018 11:00 AM Neurology Tower Health Medical Group 484-628-4656

Instructions from LAWRENCE A BRZOZOWSKI, MD

Sleep hygiene: No caffeine after 1600 hr. Drink most of water or other liquids before 1800 hr. No bright lights for 2 hr before going to bed that means no cellphone no computer no iPad no TV and no stressful things for 1 to 2 hr before going to bed. When walking into the bedroom to go to sleep at night not allowed to think about stressful things only dream about nice things that have happened nice things that she want to happen in the future.

Drink 64 oz of water daily

Try to get 7 to 8 hr sleep each night

Try to use noiseless ear phones when near any electromagnetic force that may cause headache including easy pass, smart meter etc. Patient should not have smart meter put in his home because of extreme sensitivity to it causing severe headaches

Do regular exercise specifically walk 30 min 5 days a week during which time think only of positive things.

Avoid watching too many news programs as the news is been all negative

Return in about 3 months (around 11/9/2018).

What's Next

NOV 1 2018 Office Visit with David E Young, MD
Thursday November 1 11:30 AM
(Arrive by 11:15 AM)
Arrive 15 minutes prior to appointment.

Family Medicine Tower Health Medical Group
7173 Bernville Road
Bernville PA 19506-8624
610-816-2040

NOV 15 2018 Office Visit with LAWRENCE A. BRZOZOWSKI, MD
Thursday November 15 11:00 AM
(Arrive by 10:45 AM)
Arrive 15 minutes prior to appointment.

Neurology Tower Health Medical Group
301 S. 7th Ave, DOB Suite 210
West Reading PA 19611-1450
484-628-4656

Today's Visit

You saw LAWRENCE A BRZOZOWSKI, MD on Thursday August 9, 2018. The following issues were addressed: Migraines and Light sensitivity.

	Blood Pressure 132/90		BMI 24.13
	Weight 173 lb		Height 5' 11"
	Temperature (Oral) 97.3 °F		Pulse 62



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Go to <https://mychart.readinghealth.org/MyChart/>

Questions: call MyChart help desk at 484-628-6924.