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August 9, 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

**RE: Finance Guru, LLC
APPLICATION TO OFFER, RENDER, FURNISH, OR SUPPLY NATURAL GAS
SUPPLY SERVICES**

Dear Secretary Chiavetta,

Enclosed please find an Application to supply natural gas services to the public in the Commonwealth of Pennsylvania for Finance Guru, LLC and the required certified check in the amount of \$350. If you need any additional information, please contact:

Harbor Compliance
Attn: Amanda Gordon
1830 Colonial Village Lane
Lancaster, PA 17601
717-431-9163
agordon@harborcompliance.com

Thank you for your time and attention to this matter.

Sincerely,



Amanda Gordon
Compliance Analyst
CC:

J. Haring, Bureau of Technical Utility Services,
Office of Consumer Advocate
Office of the Small Business Advocate
Office of Attorney General
Commonwealth of PA Dept. of Revenue
Bureau of Investigation & Enforcement
Columbia Gas of PA, Inc.
Peoples Natural Gas - Equitable Division

(jharing@pa.gov)
The Peoples Natural Gas Co.
PECO
Peoples Gas Company
Philadelphia Gas Works
National Fuel Gas Distribution Corp.
UGI
Valley Energy Inc.

info@harborcompliance.com • Phone: 888-995-5895 • Fax: 717-202-2576
1830 Colonial Village Lane, Lancaster, PA 17601

Harbor Compliance is not an accounting or law firm and does not provide tax, financial, or legal advice.

AUG - 9 2019

PA PUBLIC UTILITY COMMISSION *Version Revised 02/19/19*
SECRETARY'S BUREAU

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Finance Guru LLC, d/b/a _____, for approval to offer, render, furnish, or supply natural gas supply services as a(n) [as specified in item #4b below] to the public in the Commonwealth of Pennsylvania (Pennsylvania).

To the Pennsylvania Public Utility Commission:

1. IDENTIFICATION AND CONTACT INFORMATION

- a. **IDENTITY OF THE APPLICANT:** Provide name (including any fictitious name or d/b/a), primary address, web address, and telephone number of Applicant:
Finance Guru LLC
525 W. Monroe, Suite 900,
Chicago IL 60661
312.796.9748
- b. **PENNSYLVANIA ADDRESS / REGISTERED AGENT:** If the Applicant maintains a primary address outside of Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's secondary office within Pennsylvania. If the Applicant does not maintain a physical location within Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's Registered Agent within Pennsylvania.
Northwest Registered Agent, LLC
1150 First Ave, STE 511
King of Prussia, PA 19406
- c. **REGULATORY CONTACT:** Provide the name, title, address, telephone number, fax number, and e-mail address of the person to whom questions about this Application should be addressed.
Neil Pandey, Legal Director
525 W. Monroe, Suite 900,
Chicago IL 60661
312-796-9748
fg.legal@financeguru.com
- d. **ATTORNEY:** Provide the name, address, telephone number, fax number, and e-mail address of the Applicant's attorney. If the Applicant is not using an attorney, explicitly state so.
Neil Pandey, Legal Director
525 W. Monroe, Suite 900,
Chicago IL 60661
312-796-9748
fg.legal@financeguru.com
- e. **CONTACTS FOR CONSUMER SERVICE AND COMPLAINTS:** Provide the name, title, address, telephone number, fax number, and e-mail OF THE PERSON AND AN ALTERNATE PERSON (2 REQUIRED) responsible for addressing customer complaints. These persons will ordinarily be the initial point(s) of contact for resolving complaints filed with the Applicant, the Natural Gas Distribution Company, the Pennsylvania Public Utility Commission, or other agencies. The main contact's information will be listed on the Commission website list of licensed NGSs.
Neil Pandey Legal Director
525 W. Monroe, Suite 900,
Chicago IL 60661
312-796-9748
fg.legal@financeguru.com
Levon Mock, Compliance Director
525 W. Monroe, Suite 900
Chicago, IL 60661
872-588-8050
levon.mock@financeguru.com

AUG - 9 2019

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SECRETARY'S BUREAU**2. BUSINESS ENTITY FILINGS AND REGISTRATION****a. FICTITIOUS NAME:** *(Select appropriate statement and provide supporting documentation as listed.)* The Applicant will be using a fictitious name or doing business as ("d/b/a")

Provide a copy of the Applicant's filing with Pennsylvania's Department of State Pursuant to 54 Pa. C.S. §311.

Or The Applicant will not be using a fictitious name.**b. BUSINESS ENTITY AND DEPARTMENT OF STATE FILINGS:***(Select appropriate statement and provide supporting documentation. As well, understand that Domestic means being formed within Pennsylvania and foreign means being formed outside Pennsylvania.)* The Applicant is a sole proprietor.

- If the Applicant is located outside the Commonwealth, provide proof of compliance with 15 Pa. C.S. §4124 relating to Department of State filing requirements.

Or The Applicant is a:

- domestic general partnership (*)
- domestic limited partnership (15 Pa. C.S. §8511)
- foreign general or limited partnership (15 Pa. C.S. §4124)
- domestic limited liability partnership (15 Pa. C.S. §8201)
- foreign limited liability general partnership (15 Pa. C.S. §8211)
- foreign limited liability limited partnership (15 Pa. C.S. §8211)

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Give name, d/b/a, and address of partners. If any partner is not an individual, identify the business nature of the partner entity and identify its partners or officers.
- Provide the state in which the business is organized/formed and provide a copy of the Applicant's charter documentation.
- * If a corporate partner in the Applicant's domestic partnership is not domiciled in Pennsylvania, attach a copy of the Applicant's Department of State filing pursuant to 15 Pa. C.S. §4124.

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AUG - 9 2019

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The Applicant is a:

- domestic corporation (15 Pa. C.S. §1308)
- foreign corporation (15 Pa. C.S. §4124)
- domestic limited liability company (15 Pa. C.S. §8913)
- foreign limited liability company (15 Pa. C.S. §8981)
- Other (Describe):

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.
- Give name and address of officers.
Please see attachment PA NGS Part 2.b

3. AFFILIATES AND PREDECESSORS

(both in state and out of state)

- a. **AFFILIATES:** Give name and address of any affiliate(s) currently doing business and state whether the affiliate(s) are jurisdictional public utilities. If the Applicant does not have any affiliates doing business, explicitly state so. Also, state whether the applicant has any affiliates that are currently applying to do business in Pennsylvania.

Yes. Credico (USA) LLC is not a jurisdictional public utility and no other affiliate is applying to do business in Pennsylvania.

Credico (USA) LLC
525 W. Monroe
Suite 900
Chicago, IL 60661

- b. **PREDECESSORS:** Identify the predecessor(s) of the Applicant and provide the name(s) under which the Applicant has operated within the preceding five (5) years, including address, web address, and telephone number, if applicable. If the Applicant does not have any predecessors that have done business, explicitly state so. The Applicant does not have any predecessors that have done business.

4. OPERATIONS

a. APPLICANT'S PRESENT OPERATIONS: *(select and complete the appropriate statement)*

Definitions

- Supplier – an entity which provides natural gas supply services to retail gas customers utilizing the jurisdictional facilities of an natural gas distribution company
- Broker/Marketer - an entity that acts as an intermediary in the sale and purchase of natural gas but does not take title to the natural gas.

- The Applicant is presently doing business in Pennsylvania as a
- natural gas interstate pipeline
 - municipality providing service outside its municipal limits
 - local gas distribution company
 - retail supplier of natural gas services in the Commonwealth
 - a natural gas producer
 - a broker/marketer engaged in the business of supplying natural gas services
 - Other. (Identify the nature of service being rendered)

OR

- The Applicant is not presently doing business in Pennsylvania.

b. APPLICANT'S PROPOSED OPERATIONS: The Applicant proposes to operate as a:

- Supplier or Aggregator of natural gas services
- Municipal supplier of natural gas services
- Cooperative supplier of natural gas services
- Broker/Marketer engaged in the business of supplying natural gas services
 - Check here to verify that your organization will not be taking title to the natural gas nor will you be making payments for customers.
- Other (Describe):

c. PROPOSED SERVICES: Describe in detail the natural gas supply services which the Applicant proposes to offer.

Finance Guru will provide an on-line platform where customers can choose the best energy supplier based on price and other factors. The customer will then sign up for services with the energy supplier through the energy supplier's API. Finance Guru will also subcontract with independent sales offices ("ISOs") that will provide face to face sales services to acquire new customers for its energy supplier partners. ISOs will be equipped with tablets that contain Finance Guru's website and will guide consumers through the various partner energy supplier offerings.

d. PROPOSED SERVICE AREA: Check the box of each Natural Gas Distribution Company for which the Applicant proposes to provide service.

- | | |
|--|---|
| <input type="checkbox"/> Columbia | <input type="checkbox"/> Peoples Gas Company |
| <input type="checkbox"/> National Fuel Gas | <input type="checkbox"/> Philadelphia Gas Works |
| <input type="checkbox"/> PECO | <input type="checkbox"/> UGI Utilities – Gas Division |
| <input type="checkbox"/> Peoples Natural Gas Company | <input type="checkbox"/> Valley Energy |
| <input type="checkbox"/> Peoples Natural Gas – Equitable Div | <input checked="" type="checkbox"/> All of the above |

e. CUSTOMERS: Applicant proposes to provide services to:

- Residential Customers
- Small Commercial Customers - (Less than 6,000 Mcf annually)
- Residential and Small Commercial as Mixed Meter ONLY (CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE)
- Large Commercial Customers - (6,000 Mcf or more annually)
- Industrial Customers
- Governmental Customers
- All of above (Except Mixed Meter)
- Other (Describe):

f. START DATE: Provide the approximate date the Applicant proposes to actively market within the Commonwealth. Upon approval of license

AUG - 9 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

5. COMPLIANCE

- a. **CRIMINAL/CIVIL PROCEEDINGS:** State specifically whether the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, has been or is currently the defendant of a criminal or civil proceeding within the last five (5) years.

Identify all such proceedings (active or closed), by name, subject and citation; whether before an administrative body or in a judicial forum. If the Applicant has no proceedings to list, explicitly state such. Please see attachment PA NGS Part 5.a and b

- b. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any such proceedings listed above.
Please see attachment PA NGS Part 5.a and b

- c. **CUSTOMER/REGULATORY/PROSECUTORY ACTIONS:** Identify all formal or escalated actions or complaints filed with or by a customer, regulatory agency, or prosecutory agency against the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, for the prior five (5) years, including but not limited to customers, Utility Commissions, and Consumer Protection Agencies such as the Offices of Attorney General. **Applicant should also include if it had a Pennsylvania PUC EGS or NGS license previously cancelled by the Commission.** If the Applicant has no actions or complaints to list, explicitly state such. The applicant has no actions or complaints to list.

- d. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any actions listed above. N/A

6. PROOF OF SERVICE

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.
(Example Certificate of Service is attached at Appendix C)

- a.) **STATUTORY AGENCIES:** Pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14, provide proof of service of a signed and verified Application with attachments on the following:

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

Office of the Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

Office of the Small Business Advocate
Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17101

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
Harrisburg, PA 17128-0946

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

b.) **NGDCs:** Pursuant to Sections 1.57 and 1.58 of the Commission's Regulations, 52 Pa. Code §§1.57 and 1.58, provide Proof of Service of the Application and attachments upon each of the Natural Gas Distribution Companies the Applicant proposed to provide service in. Upon review of the Application, further notice may be required pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14. Contact information for each NGDC is as follows.

<p>Columbia Gas of PA, Inc. Michele Caddell 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.6841 FAX: 614.460.8447 e-mail: mcaddell@nisource.com</p>	
<p>Peoples Natural Gas Company LLC – Equitable Division Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>National Fuel Gas Distribution Corp. Joanne E. Maciok 6363 Main Street Williamsville, NY 14221 PH: 716.857.7670 FAX: 716.857.7479 e-mail: maciokj@natfuel.com</p>
<p>Peoples Natural Gas Company LLC Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>PECO Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 PH: 215.841.6452 Email: carlos.thillet@exeloncorp.com</p>
<p>Peoples Gas Company LLC Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>Philadelphia Gas Works Ryan Reeves, Director Supply Transportation & Control 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.787.5103 email: pgwchoicesupply@pgworks.com</p>
<p>Valley Energy Inc. Ed Rogers 523 South Keystone Avenue Sayre, PA 18840-0340 PH: 570.888-9664 FAX: 570.888.6199 email: erogers@ctenterprises.org</p>	<p>UGI Utilities, Inc. – Gas Division David Lahoff 2525 N. 12th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@ugi.com</p>

AUG - 9 2019

PA PUBLIC UTILITY COMMISSION
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- a. **BONDING:** In accordance with 66 Pa. C.S. Section 2208(c), no natural gas supplier license shall be issued or remain in force unless the applicant or holder furnishes a bond or other security in a form and amount to ensure the financial responsibility of the natural gas supplier. The criteria used to determine the amount and form of such bond or other security shall be set by each NGDC. Provide documentation that the applicant has met the security requirement of each NGDC by submitting the letters sent by the NGDCs stating what bonding amounts they require. The contact information is located in Section 6.b.
- b. **FINANCIAL RECORDS, STATEMENTS, AND RATINGS:** Applicant must provide sufficient information to demonstrate financial fitness commensurate with the service proposed to be provided. Examples of such information which may be submitted include the following: See Attachment NGS 7.b
- Actual (or proposed) organizational structure including parent, affiliated or subsidiary companies.
 - Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient)
 - Applicant's accounting statements, including balance sheet and income statements for the past two years.
 - Evidence of Applicant's credit rating. Applicant may provide a copy of its Dun and Bradstreet Credit Report and Robert Morris and Associates financial form, evidence of Moody's, S&P, or Fitch ratings, and/or other independent financial service reports.
 - A description of the types and amounts of insurance carried by Applicant which are specifically intended to provide for or support its financial fitness to perform its obligations as a licensee.
 - Audited financial statements exhibiting accounts over a minimum two year period.
 - Bank account statement, tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.
- c. **SUPPLIER FUNDING METHOD:** If Applicant is operating as anything other than **Broker/Marketer only**, explain how Applicant will fund its operations. Provide all credit agreements, lines of credit, etc., and elaborate on how much is available on each item.
Applicant proposed to operate as a Broker/ Marketer only.
- d. **BROKER PAYMENT STRUCTURE:** If applicant is a broker/marketer, explain how your organization will be collecting your fees.
Finance Guru will provide an on-line platform where potential customers can choose the best energy supplier based on price and other factors. Finance Guru will also subcontract door-to-door sales through Independent Sales Offices (ISO) that will employ sales agents that are equipped with tablets that provide access to Finance Guru's website. The customer will then sign up for services with the energy supplier through the energy supplier's API. All customer billing statements will be between the energy supplier and customer. Finance Guru will be paid a commission by the energy supplier when a customer signs up for their service through the Finance Guru website. Tracking software will provide the energy supplier and Finance Guru information on the customers that were directed to the energy supplier and signed up for their services.

- e. **ACCOUNTING RECORDS CUSTODIAN:** Provide the name, title, address, telephone number, FAX number, and e-mail address of Applicant's custodian for its accounting records.

Ann Shilney, Accounting Manager,
525 W. Monroe, Suite 900 Chicago, IL 60661
312-448-7758,
fg.accounting@financeguru.com

- f. **TAXATION:** Complete the TAX CERTIFICATION STATEMENT attached as Appendix D to this application.

All sections of the Tax Certification Statement must be completed. Absence (submitting N/A) of any of the TAX identifications numbers (items 7A through 7C) shall be accompanied by supporting documentation or an explanation validating the absence of such information.

Items 7A and 7C on the Tax Certification Statement are designated by the Pennsylvania Department of Revenue. Item 7B on the Tax Certification Statement is designated by the Internal Revenue Service.

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8. TECHNICAL FITNESS

To ensure that the present quality and availability of service provided by natural gas distribution companies does not deteriorate, the Applicant shall provide sufficient information to demonstrate technical fitness commensurate with the service proposed to be provided.

- a. **EXPERIENCE, PLAN, STRUCTURE:** such information may include:

See Attachment NGS 8.a

- Applicant's previous experience in the natural gas industry.
- Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions.
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
- Staffing structure and numbers as well as employee training commitments.
- Business plans for operations within the Commonwealth.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

- b. **PROPOSED MARKETING METHOD** (*check all that apply*)

- Internal – Applicant will use its own internal resources/employees for marketing
- External NGS – Applicant will contract with a **PUC LICENSED NGS**
- Affiliate – Applicant will use a **NON-NGS affiliate that is a nontraditional marketer and/or marketing services consultant**
- External Third-Party – Applicant will contract with a **NON-NGS third party nontraditional marketer and/or non-selling marketer**
- Other (Describe): See NGS Attachment 8.b and c

c. **DOOR TO DOOR SALES:** Will the Applicant be implementing door to door sales activities?

- Yes
- No

If yes, will the Applicant be using verification procedures?

- Yes
- No

If yes, describe the Applicant's verification procedures.
See NGS Attachment 8.b and c

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d. **OVERSIGHT OF MARKETING:** Explain all methods Applicant will use to ensure all marketing is performed in an ethical manner, for both employees and subcontractors.
See NGS Attachment 8.b, c and d

e. **OFFICERS:** Identify Applicant's chief officers, and include the professional resumes for any officers directly responsible for operations. All resumes should include date ranges and job descriptions containing actual work experience. See NGS Attachment 8.e

9. DISCLOSURE STATEMENT:

(Not applicable for an applicant applying for a license exclusively as a broker/marketer.)

DISCLOSURE STATEMENTS: If proposing to serve Residential and/or Small Commercial (less than 6,000 Mcf annually) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix E to this Application.

- Natural gas should be priced in clearly stated terms to the extent possible. Common definitions should be used. All consumer contracts or sales agreements should be written in plain language with any exclusions, exceptions, add-ons, package offers, limited time offers or other deadlines prominently communicated. Penalties and procedures for ending contracts should be clearly communicated.
Not applicable

10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

- a. **STANDARDS OF CONDUCT AND DISCLOSURE:** As a condition of receiving a license, Applicant agrees to conform to any Uniform Standards of Conduct and Disclosure as set forth by the Commission. Further, the Applicant agrees that it must comply with and ensure that its employees, agents, representatives, and independent contractors comply with the standards of conduct and disclosure set out in Commission regulations at 52 Pa. Code § 62.114.

AGREED

- b. **REPORTING REQUIREMENTS:** Applicant agrees to provide the following information to the Commission:
- Reports of Gross Receipts: Applicant shall file an annual report with the Commission on an annual basis no later than April 30th following the end of the calendar year per 52 Pa. Code § 62.110.

AGREED

- c. **TRANSFER OF LICENSE:** The Applicant understands that if it plans to transfer its license to another entity, it is required to request authority from the Commission for permission prior to transferring the license. See 66 Pa. C.S. § 2208(d). Transferee will be required to file the appropriate licensing application.

AGREED

- d. **ANNUAL FEES:** The Public Utility Code authorizes the PUC to collect an annual fee of \$350 from suppliers, brokers, marketers, and aggregators selling natural gas in the Commonwealth of PA, and a supplemental fee based on annual gross intrastate revenues, applicable to suppliers only.

ACKNOWLEDGED

- e. **FURTHER DEVELOPMENTS:** Applicant is under a continuing obligation to amend its application if substantial changes occur to the information upon which the Commission relied in approving the original filing. See 52 Pa. Code § 62.105.

AGREED

- f. **FALSIFICATION:** The Applicant understands that the making of false statement(s) herein may be grounds for denying the Application or, if later discovered, for revoking any authority granted pursuant to the Application. This Application is subject to 18 Pa. C.S. §§4903 and 4904, relating to perjury and falsification in official matters.

AGREED

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g. NOTIFICATION OF CHANGE: If your answer to any of these items changes during the pendency of your application or if the information relative to any item herein changes while you are operating within the Commonwealth of Pennsylvania, you are under a duty to so inform the Commission, within thirty (30) days, as to the specifics of any changes which have a significant impact on the conduct of business in Pennsylvania. See 52 Pa. Code § 62.105.

AGREED

h. CEASING OF OPERATIONS: Applicant is also required to officially notify the Commission if it plans to cease doing business in Pennsylvania, 90 days prior to ceasing operations.

AGREED

i. FILING FEE: The Applicant has enclosed or paid the required, non-refundable filing fee by **CERTIFIED CHECK OR MONEY ORDER** in the amount of \$350.00 payable to the Commonwealth of Pennsylvania. The Commission does not accept corporate or personal checks for filing fees.

PAYMENT ENCLOSED

11. AFFIDAVITS
(All affidavits must be notarized before filing.)

a.) APPLICATION AFFIDAVIT: Complete and submit with your filing an officially notarized Application Affidavit stating that all the information submitted in this application is truthful and correct. An example copy of this Affidavit can be found at Appendix A.

b.) OPERATIONS AFFIDAVIT: Provide an officially notarized affidavit stating that you will adhere to the Public Utility Code of Pennsylvania and applicable federal and state laws. An example copy of this Affidavit can be found at Appendix B.

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12. NEWSPAPER PUBLICATIONS

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.

Notice of filing of this Application must be published in newspapers of general circulation covering each county in which the applicant intends to provide service. The newspapers in which proof of publication are required is dependent on the service territories the applicant is proposing to serve.

The chart below dictates which newspapers are necessary for each NGDC. For example, an applicant that wants to operate in Peoples – Equitable would need to run ads in both The Erie Times-News and the Pittsburgh Post-Gazette. If the applicant is proposing to serve the entire Commonwealth, please file proof of publication in all seven newspapers.

The only acceptable verification of this requirement is with Notarized Proofs of Publication, which may be requested from each newspaper and must be supplied with this application. Applicants do not need a docket number in their publication. Docket numbers will be issued when all criteria on the item 14 checklist (see below) are satisfied.

	Erie Times-News	Harrisburg Patriot-News	Philadelphia Daily News	Pittsburgh Post-Gazette	Scranton Times-Tribune	Williamsport Sun-Gazette	Johnstown Tribune-Democrat
Columbia Gas	X	X		X		X	X
National Fuel Gas	X			X			
PECO			X				
Peoples - Equitable	X			X			
Peoples Natural Gas	X			X			X
Peoples Gas Company				X			
Philadelphia Gas Works			X				
UGI Utilities – Gas Div.	X	X	X	X	X	X	X
Valley Energy					X	X	
Entire Commonwealth	X	X	X	X	X	X	X

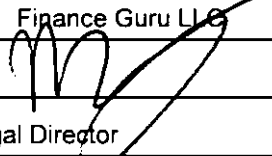
(Example Publications are provided at Appendices F and G)

13. SIGNATURE

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SECRETARY'S BUREAU

Applicant: Finance Guru LLC
 By: 
 Title: Legal Director

14. CHECKLIST

For the applicant's convenience, please use the following checklist to ensure all relevant sections are complete. The Commission Secretary's Bureau will not accept an application unless each of the following sections is complete.

Applicant: Finance Guru LLC

Applicant's Use	Signature	PUC Secretary's Bureau Use
	Filing Fee (ONLY CERTIFIED CHECK OR MONEY ORDER)	
	Application Affidavit	
	Operations Affidavit	
	Proof of Publication	
	Tax Certification Statement	
	Commonwealth Department of State Verification	
	Certificate of Service	

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Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Illinois :

ss.

County of Cook :

Neil Pandey, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the Legal Director (Office of Affiant) of Finance Guru LLC (Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That the Applicant herein Finance Guru LLC has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as a natural gas supplier pursuant to 66 Pa. C.S. § 2208 (c)(1).

That the Applicant herein Finance Guru LLC has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein Finance Guru LLC acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

That the Applicant herein Finance Guru LLC acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

Signature of Affiant

Sworn and subscribed before me this 6th day of August, 2019.

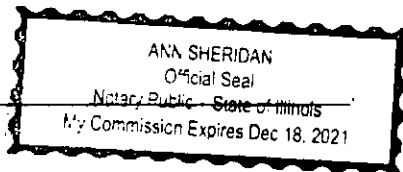
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Signature of official administering oath

My commission expires



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AUG - 9 2019

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OPERATIONS AFFIDAVIT

[Commonwealth/State] of Illinois :

ss.

County of Cook :

Neil Pandey, Affiant, being duly [sworn/affirmed] according to law,
deposes and says that:

[He/she is the Legal Director (Office of Affiant) of Finance Guru LLC
(Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That Finance Guru LLC, the Applicant herein, acknowledges that [Applicant] may have obligations pursuant to this Application consistent with the Public Utility Code of the Commonwealth of Pennsylvania, Title 66 of the Pennsylvania Consolidated Statutes; or with other applicable statutes or regulations including Emergency Orders which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.

That Finance Guru LLC, the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render natural gas supply service within the Commonwealth of Pennsylvania and that the Applicant will abide by all applicable federal and state laws and regulations and by the decisions of the Pennsylvania Public Utility Commission.

That Finance Guru LLC, the Applicant herein, certifies to the Commission that it is subject to, will pay, and in the past has paid, the full amount of taxes imposed by Articles II and XI of the Act of March 4, 1971 (P.L. 6, No. 2), known as the Tax Reform Act of 1971 and any tax imposed by Chapter 22 of Title 66. The Applicant acknowledges that failure to pay such taxes or otherwise comply with the taxation requirements of Chapter 28 shall be cause for the Commission to revoke the license of the Applicant. The Applicant acknowledges that it shall report to the Commission its jurisdictional natural gas sales for ultimate consumption, for the previous year or as otherwise required by the Commission. The Applicant also acknowledges that it is subject to 66 Pa. C.S. §506 (relating to the inspection of facilities and records).

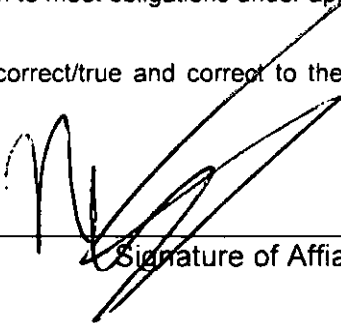
Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing that information to the Pennsylvania Public Utility Commission.

Appendix B (Continued)

That Finance Guru LLC, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506 and the standards and billing practices of 52 PA. Code Chapter 56.

That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Office of Communications or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the law.

That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.



Signature of Affiant

Sworn and subscribed before me this 07th day of August, 2019.



Signature of official administering oath

My commission expires _____


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SECRETARY'S BUREAU

Appendix C

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.

CERTIFICATE OF SERVICE TEMPLATE

On this the 10 day of August 2019, I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as a Natural Gas Supplier and all **NON-CONFIDENTIAL** attachments have been served, as either a hardcopy or a searchable PDF version on a cd-rom, upon the following:

<p>Office of Consumer Advocate 5th Floor, Forum Place 555 Walnut Street Harrisburg, PA 17120</p>	<p>Office of the Attorney General Bureau of Consumer Protection Strawberry Square, 14th Floor Harrisburg, PA 17120</p>
<p>Office of the Small Business Advocate Commerce Building, Suite 202 300 North Second Street Harrisburg, PA 17101</p>	<p>Commonwealth of Pennsylvania Department of Revenue Bureau of Compliance Harrisburg, PA 17128-0946</p>
<p>Columbia Gas of PA, Inc. Michele Caddell 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.6841 FAX: 614.460.8447 e-mail: mcaddell@nisource.com</p>	<p>Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2 West Harrisburg, PA 17120</p>
<p>Peoples Natural Gas Company LLC – Equitable Division Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>National Fuel Gas Distribution Corp. Joanne E. Maciok 6363 Main Street Williamsville, NY 14221 PH: 716.857.7670 FAX: 716.857.7479 e-mail: maciokj@natfuel.com</p>
<p>Peoples Natural Gas Company LLC Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>PECO Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 PH: 215.841.6452 Email: carlos.thillet@exeloncorp.com</p>
<p>Peoples Gas Company LLC Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>Philadelphia Gas Works Ryan Reeves, Director Supply Transportation & Control 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.787.5103 email: pgwchoicesupply@pgworks.com</p>

Valley Energy Inc.

Ed Rogers
523 South Keystone Avenue
Sayre, PA 18840-0340
PH: 570.888-9664
FAX: 570.888.6199
email: erogers@ctenterprises.org

UGI Utilities, Inc. – Gas Division

David Lahoff
2525 N. 12th Street, Suite 360
Reading, PA 19612-2677
PH: 610.796.3520
Email: dlahoff@ugi.com



Neil Pardey, Finance Guru LLC


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SECRETARY'S BUREAU

Pennsylvania Natural Gas Supplier Application Part 3b
PA Department of State Filing
II. incorporation documents
Name and address of office:

**PENNSYLVANIA DEPARTMENT OF STATE
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS**

Document will be returned to the name and address entered below. Filings Team Name 1150 First Ave. STE 511, Address King of Prussia PA 19406 City State Zip Code	Foreign Registration Statement DSCB: 15-412 (rev. 2/2017)  412
---	--

Read all instructions prior to completing. This form may be submitted online at <https://www.corporations.pa.gov>.

Fee: \$250.00

I qualify for a veteran/reservist-owned small business fee exemption (see instructions)

In compliance with the requirements of the applicable provisions of 15 Pa.C.S. § 412 (relating to foreign registration statement), the undersigned foreign association hereby states that:

1. The type of association is (check only one):

- Business Corporation Limited Partnership Business Trust
 Nonprofit Corporation Limited Liability (General) Partnership Professional Association
 Limited Liability Company Limited Liability Limited Partnership

2. The full and proper name of the foreign association as registered in its jurisdiction of formation is:

Finance Guru LLC

2A. If the name in 2 does not contain a required designator or if the name in 2 is not available for use in the Commonwealth, the alternate name under which the association is registering in this Commonwealth is:

3. The jurisdiction of formation: DE

4. The street and mailing address of the association's principal office.

1150 First Ave. STE 511, King of Prussia PA 19406

Number and street City State Zip

4A. The street and mailing address of the office, if any, required to be maintained by the law of the association's jurisdiction of formation in that jurisdiction:

Number and street City State Zip

**STATE of DELAWARE
LIMITED LIABILITY COMPANY
CERTIFICATE of FORMATION**

**FIRST
Name**

The name of the limited liability company is:
Finance Guru LLC

**SECOND
Registered Agent**

The address of its registered office in the State of Delaware is
8 The Green, Suite B in the City of Dover. Zip code 19901.

The name of its registered agent at such address is
Northwest Registered Agent Service, Inc.


**THIRD
Duration**

The duration of the limited liability company shall be perpetual.

**FOURTH
Purpose**

The purpose for which the company is organized is to conduct any and all lawful business for which Limited Liability Companies can be organized pursuant to Delaware statute.

In Witness Whereof, the undersigned have executed this Certificate of Formation this 25th day of September, 2018.

By: 
Authorized Person

Name: Morgan Noble

Name and Address of officers

John R. Zavoyna, 525 W. Monroe, Ste. 900, Chicago, IL 60661
Neil Pandey, 525 W. Monroe, Ste. 900, Chicago, IL 60661
Mark Johnson, 525 W. Monroe, Ste. 900, Chicago, IL 60661
Lexon Mock, 525 W. Monroe, Ste. 900, Chicago, IL 60661
Jon Brevling, 525 W. Monroe, Ste. 900, Chicago, IL 60661
Christine Aceron, 525 W. Monroe, Ste. 900, Chicago, IL 60661
Monal Patel, 525 W. Monroe, Ste. 900, Chicago, IL 60661

Pennsylvania Natural Gas Supplier Application
Attachment 7.f. Bond letters from NGDCs



An Exelon Company

August 8, 2019

Finance Guru
Neil Pandey
525 W. Monroe, Suite 900
Chicago, IL 60661

Re: Broker Requirements

Dear Finance Guru:

PECO is aware that Finance Guru has applied for a license to provide brokering and consulting services to commercial and industrial customers on the distribution system of PECO.

In making such an application, Finance Guru could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Finance Guru has indicated that it intends to provide only brokering and consulting services to commercial and industrial customers, and will not take title to any delivered natural gas; nor will accept any customer payments or deposits. Therefore, PECO has determined at this time that Finance Guru does not need a bond or other financial security requirement, since they are not directly engaging in business with PECO and only providing brokering or consulting services to PECO customers. However, if the services provided by Finance Guru the creditworthiness requirement for PECO's exposure to Finance Guru changes in the future, PECO reserves the right to require Finance Guru to provide a bond or other financial security instrument.

If you should have any questions regarding this matter, please contact Chris Sauerbaum at 215-841-6422 or myself at 215-841-6452.

Respectfully submitted,

A handwritten signature in cursive script that reads "Carlos P. Thillet".

Carlos P. Thillet
Manager, Gas Supply and Transportation
2301 Market Street
Philadelphia, Pa 19103

July 29, 2019

Neil Pandey
Finance Guru
525 W. Monroe, Suite 900
Chicago IL 60661

Dear Neil Pandey:


We are pleased that Finance Guru has applied for a license to provide Natural Gas Broker/Marketer Services on the distribution system of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas").

Under Paragraph 2.4.5 of the Rules Applicable to Distribution Service section of the Tariff of Columbia Gas, Finance Guru could be required to provide to Columbia Gas a bond or other financial security instrument in an amount that Columbia Gas determines to be appropriate. Finance Guru has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Finance Guru does not need a bond or other financial security requirement to provide broker natural gas services to Columbia Gas customers.

If the creditworthiness requirement or Columbia Gas' exposure to Finance Guru changes in the future, Columbia Gas might deem it appropriate to require Finance Guru to provide a bond or other financial security instrument.

Please feel free to contact me at 614-460-4881 should you have any questions regarding a bond or other financial security instrument requirements of Columbia Gas.

Sincerely,



Debbie Vair
Manager, Gas Transportation and Sales Support



National Fuel

July 31, 2019

Neil Pandey, Legal Director
Finance Guru LLC
525 W. Monroe, Suite 900
Chicago, IL 60661

Re: Finance Guru LLC

Dear Neil,

National Fuel Gas Distribution Corporation ("NFGDC") is aware Finance Guru LLC (FGU) has filed an application with the Pennsylvania Public Utility Commission to supply natural gas service to the public in Pennsylvania and specifically within the service territory of NFGDC.

As you know, in making such an application, FGU must furnish acceptable security to each utility where FGU will do business. As such, under its tariff, NFGDC could require FGU to provide a bond or other financial security instrument in an amount that NFGDC determines to be appropriate.

However, you have indicated, and it is NFGDC's understanding that FGU intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, FGU will never take title to any delivered natural gas.

Based upon your representations, NFGDC has determined that, at this time, FGU does not need to post a bond or other form of security to operate in its service territory. However, if the services provided by FGU change in the future, NFGDC reserves the right to require security from FGU as it deems appropriate.

If you have any questions concerning the foregoing, please contact me at 716-857-7541.

Yours truly,

Nicole Barker
Transportation Services Department



375 North Shore Drive
Pittsburgh, PA 15212

www.peoples-gas.com

July 30, 2019

Neil Pandey
Legal Director
Finance Guru
525 W. Monroe, Suite 900
Chicago IL 60661

Dear Mr. Pandey:

We are pleased that Finance Guru has applied for a license to provide natural gas services on the Peoples Group of Companies. Specifically you have requested to be licensed as a supplier on the distribution systems of Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division, and Peoples Gas Company LLC (formerly Peoples TWP) (“the Companies”).

Since Finance Guru is not currently serving customers on the Peoples systems, we have determined at this time that Finance Guru does not need a bond or other financial security requirement to provide these services to the Company’s customers.

If a Pool is established, and customers are enrolled which alters the creditworthiness requirement or the Company’s exposure to Finance Guru provision of services on the Peoples’ system changes in the future, the Companies may deem it appropriate to require a bond or other financial instrument.

If you have any questions feel free to contact me at 412-208-6593 or by email at Andrew.Wachter@peoples-gas.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Wachter", written over a horizontal line.

Andrew Wachter
Director, Finance & Regulation
Peoples Natural Gas Company LLC

Cc: Stephen Kelly
Mina Speicher



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

July 30, 2019

Mr. Neil Pandey
Finance Guru
525 W. Monroe, Suite 900
Chicago, IL 60661
Email: fg.legal@financeguru.com

RE: Security Requirement Bond for Finance Guru

Dear Mr. Pandey:

Philadelphia Gas Works ("PGW") is aware that Finance Guru has filed an application with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania and specifically within the services territory of Philadelphia Gas Works.

As you know, in making such an application, Finance Guru must furnish acceptable security to each utility where Finance Guru will do business. As such, under its tariff, Philadelphia Gas Works could require Finance Guru to provide a bond or other financial security instrument in an amount that Philadelphia Gas Works determines to be appropriate.

However, you have indicated, and it is Philadelphia Gas Works' understanding, that Finance Guru intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that in performing these services Finance Guru will never take title to any delivered natural gas.

Based upon your representations, Philadelphia Gas Works has determined that, at this time, Finance Guru does not need to post a bond or other form of security to operate in its service territory. If the services provided by Finance Guru should change, Philadelphia Gas Works reserves the right to require security from Finance Guru as it deems appropriate.

If you have any questions concerning the foregoing, please contact me at 215-684-6725.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Zuk'.

JOHN ZUK
Vice President, Gas Supply

/dls



UGI Utilities, Inc.
1 UGI Drive
Denver, PA 17517
610-796-3400

VIA E-MAIL

July 31, 2019

Finance Guru, LLC
525 W. Monroe
Suite 900
Chicago, IL 60661

ATTENTION: Neil Pandey

**RE: Finance Guru, LLC
Application to Serve as a Natural Gas Broker**

Dear Mr. Pandey,

Based on your assertion that Finance Guru, LLC ("Finance Guru") is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities, Inc. ("UGIU") has concluded that Finance Guru will not need to post security with UGI Utilities, Inc. – South Rate District ("UGI South"), UGI Utilities, Inc. – North Rate District ("UGI North") or UGI Utilities, Inc. – Central Rate District ("UGI Central"). This is based on the declaration that Finance Guru will be acting in conjunction with a licensed Natural Gas Supplier who has been approved by the Pennsylvania Public Utility Commission to serve in the applicable UGIU service territories and who has posted the required financial security as specified in the respective UGIU Tariffs. If Finance Guru wishes to directly serve Choice customers in the service territories of UGI South, UGI North and/or UGI Central in the future as a natural gas supplier, it will have to post security as specified in the respective UGI Tariffs prior to the commencement of the service.

Please feel free to contact me with any additional questions you may have.

Sincerely,

David E. Lahoff
Senior Manager
Tariff & Supplier Administration



VALLEY ENERGY

523 S. Keystone Avenue, P.O. Box 340, Sayre, PA 18840
800/998-4427 • 570/888-9664 • FAX 570/888-6199

July 30, 2019

VIA EMAIL

Mr. Neil Pandey
Finance Guru, LLC
525 W. Monroe, Suite 900
Chicago, IL 60661
fg.legal@financeguru.com

Dear Mr. Pandey:

We understand that Finance Guru, LLC has applied with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania including our company's service area.

Because Finance Guru, LLC intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that Finance Guru, LLC will not be required to post a bond or other form of financial security instrument to provide these services in our service area. However, if the services provided change in the future, we reserve the right to require security from Finance Guru, LLC as deemed appropriate.

If you have any questions, please contact Jamie Levering at 570-888-9664 (Ext. 5232).

Sincerely,

Edward E. Rogers
President & CEO

EER/ss

cc: J. Levering, Valley Energy

Pennsylvania Natural Gas Supplier Part 8e. Chief Resume

JOHN R. ZAVOYNA

60 E. Monroe St., Suite 4004, Chicago, IL. 60603 | 512.217.3673 | jzavoyna@aol.com

FINANCIAL SERVICES EXECUTIVE / C-LEVEL

Innovative Financial Services, Marketing, and Business Development Executive with deep C-Level experience offering expertise in strategy development and execution, managed growth, operations, business development, business and consumer lending, product development, strategic partnerships, program management, payments, regulatory compliance, and international business. Provide strong analytical and risk management abilities, with accountability for P&L management. Effectively resolve complex issues, introduce change, promote a customer-centric organization, and build upon a history of member services. Collaborate with executives to set the corporate tone, foster a culture of accountability, transparency, continual improvement, and ethical business practices. Provide exceptional communication skills and a leadership style that inspires staff and promotes collaboration. Implement best practices, and provide support to enhance technology/product offerings.

AREAS OF EXCELLENCE

Financial Services Management • Strategy • Marketing and Branding • Leadership • Fin-Tech • Acquisitions • Compliance
Enterprise Risk Management • Operations • Managed Growth • Technology • Relationship Building • Communication

CAREER NARRATIVE

Finance Guru, Chicago, IL (2018 to Present)

Chief Executive Officer

Provide overall leadership and strategic direction for the formation and growth of a U.S. based online digital price comparison platform for both B2C and B2B product verticals.

- Drive development and execution of an approved business plan, technology initiatives.
- Recruit, motivate, and retain domain expertise in .net programming, UI (user experience) development, SEO strategy, Customer service, artificial intelligence, and vertical specific SME's.
- Oversee prioritization of vertical focus and business development initiatives.
- Ensure both regulatory compliance and ERM (enterprise risk management) best practices.

Credico, Chicago, IL (2017 to Present)

Chief Operating Officer

Serving as the U.S. based COO for an international direct sales and company with ISO's located in the U.S., Canada, U.K., and South Africa.

- Oversee operations, client services, marketing, finance, legal, compliance, business intelligence, technology, acquisitions, and human capital.
- Major clients include AT&T, Verizon, Comcast, Sprint, Frontier, Charter Communications, Direct Energy, Quill Office.

BFS Capital, Coral Springs, FL (2012 to 2017)

Chief Commercial Officer and Chief Operating Officer

Served as the CCO for a leading technology-based, small business-lending platform deploying nearly \$1.5BN in capital since 2002. Manage all aspects of strategic partnerships and banking relationships, including strategy, product development, pricing, negotiation, marketing, business development, and program execution.

- Served as **Chief Operating Officer** from 2012 to 2015, overseeing all key operational areas such as business development, operations, underwriting, asset management, compliance, accounting, IT, and human resources, managing three US-based facilities.
- Successfully sourced, negotiated, and implemented a 50-state loan expansion strategy as the key driver of a five-year CAGR of 27.7%.
- Partnered with the CEO in establishing and onboarding Boost Capital, a UK lending subsidiary.
- Managed the development and implementation of initial phases of automated decision models.
- Installed the Entrepreneurial Operation System (EOS) model to align and synchronize the organization to produce desired business outcomes.
- Procured a new 22K square foot facility and oversaw the relocation of 180+ staff.
- Solidified the DR/BCP program with the acquisition of storage and recovery capabilities at AT&T NOC in Miami, FL.

BenchWorks, LLC, Austin, TX (2010 to 2012)

Principal

Owned and managed the financial services and fin-tech consulting firm engaged in business model development, go-to-market strategy/execution, product development, third-party solutions, change management and operational efficiency.

- Served a Virginia-based subsidiary of a \$1.2B loyalty and motivation company, engaging in the development of a business model, loyalty program strategy, and the delivery of digital based products/services into the non-profit and association marketplace.

Biometric Access Company, Austin, TX (2008 to 2009)**President and CEO**

Stabilized and facilitated the sale of the vertically integrated fin-tech firm specializing in payroll check cashing, stored value, physical access, time and attendance and controlled substance tracking with over 70% of revenue derived from financial service products targeted to the unbanked/under-banked markets.

- Overcame roadblocks within cash flow and the organization's status as EBITDA challenged.
- Drove change in strategy, gains in operational efficiency, the introduction of Enterprise Risk Management (ERM) processes, and unified corporate discipline.
- Successfully completed required turnaround initiatives in 18 months with the company being sold in Q4 2009.

Dell Financial Services, Austin, TX (2005 to 2007)**President and CEO**

Directed the efforts of 2,500 staff with 1,200 offshore team members while overseeing a \$310MM operating budget for the captive finance subsidiary of Dell Computer. Directed all aspects of five major businesses generating \$300MM+ in pre-tax income, including consumer, Small/Medium Business (SMB), commercial, end-of-lease and international, and served 3.2MM customers generating over \$6BN in new loans and leases annually.

- Managed the negotiation, development and implementation of a new Fair Isaac (FICO) based automated credit system for the consumer and SMB segments.
- Designed the loan syndication program for commercial leases with the second full year syndications exceeding \$110MM while generating \$2MM+ in fee income.
- Conducted comprehensive expense reduction initiatives yielding \$20MM+ in re-investment opportunities.
- Developed a pre-approval program and a thin file strategy that resulted in a 4%+ increase in penetration for the consumer business with overall consumer penetration increasing from 37% to 46%.
- Successfully introduced the payment specialist concept, yielding a 90% increase in lease penetration, a 12% hike in customer satisfaction, and a 5% reduction in credit card penetration.
- Merged the AlienWare (Dell acquisition) lending platform into DFS, and conceptualized/negotiated a comprehensive Spanish language financing solution.
- Achieved an increase in fraud detection from 71% to 86% through system and strategy initiatives, including custom fraud score models, hold order process changes, and real-time authorizations and duplicate logic rules in the new credit system, resulting in a \$9MM+ P&L impact.
- Oversaw the development of an in-house collection agency to compete with the offshore strategy, consistently outperforming the offshore strategy on a full cost/benefit basis in nine months.
- Created an ongoing post charge-off asset sales model resulting in four sale executions and generating nearly \$20MM in fees.
- Implemented a loan workout program and legal network cover 25 states and 80% of the consumer portfolio with combined annual P&L benefits of nearly \$7MM.
- Directed the RFP, negotiation and selection of a new collection platform yielding annualized P&L benefit of \$10MM+.
- Hired a new CIO and replaced over 50% of the IT senior management team, significantly increasing IT investment and stabilizing systems through the upgrade of existing systems of record, enhancing regulatory compliance, improving customer satisfaction, and re-architecting for future growth and product line expansion.
- Recruited a new head of commercial business, significantly re-organizing the business for increased focus on sales and operational efficiency.
- Acquired the LGI government business, focusing on building leasing expertise in support of Dell initiatives with DFS securing the largest single-lease transaction in corporate history (VA Administration) in 12 months.
- Re-engineered the end-of-lease business by leveraging Dell scale in an adjacent application with the initiative yielding a sustainable \$8MM to \$12MM in annual P&L impact.

- Introduced the COSO Enterprise Risk Management (ERM) integrated framework, emphasizing executive support for the enhanced controls environment by nearly doubling the number of people assigned full time to financial, business and regulatory compliance.

EARLY CAREER SUMMARY

EXECUTIVE VICE PRESIDENT, MBNA America Bank, Wilmington, DE - (23 years)
VICE PRESIDENT / CHIEF MARKETING OFFICER, Bankers Finance Investment Management Corp., Rosslyn, VA
ASSISTANT VICE PRESIDENT – Corporate Trust, Mercantile Bank and Trust, Baltimore, MD
LENDING SPECIALIST, Maryland National Bank, Baltimore, MD

EDUCATION AND PROFESSIONAL DEVELOPMENT

GRADUATE PROGRAM – BANKING, Stonier Graduate School of Banking, University of Delaware, Newark, DE (Cum Laude)
MASTER OF BUSINESS ADMINISTRATION, Mount Saint Mary's University, Emmitsburg, MD
BACHELOR OF SCIENCE – ECONOMICS, Frostburg University, Frostburg, MD

Pennsylvania Natural Gas Supplier Application Part 12
Newspaper publications
Original proofs and with EGS application of Applicant

Proof of Publication in The Philadelphia Daily News
Under Act. No 587, Approved May 16, 1929

STATE OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Helene Sweeney being duly sworn, deposes and says that **The Philadelphia Daily News** is a newspaper published daily, except Sunday, at Philadelphia, Pennsylvania, and was established in said city in 1925, since which date said newspaper has been regularly issued in said County, and that a copy of the printed notice of publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said newspaper on the following dates:

July 31, 2019

Affiant further deposes and says that she is an employee of the publisher of said newspaper and has been authorized to verify the foregoing statement and that she is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

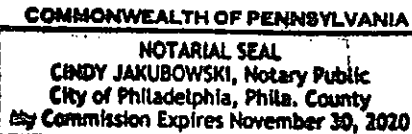


Sworn to and subscribed before me this 31st, day of
July, 2019.



Notary Public

My Commission Expires:



Copy of Notice of Publication

PENNSYLVANIA PUBLIC UTILITY COMMISSION
NOTICE
Applications of Finance Guru LLC For Approval To Offer, Render, or Furnish Services as a Broker Engaged in The Business Of Supplying Natural Gas Supply Services and Electricity Supply Services To The Public In The Commonwealth Of Pennsylvania.
Finance Guru LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/marketer engaged in the business of providing natural gas services. Finance Guru LLC will also be filing an application with the PUC for a license to supply electricity supply services (1) a broker/marketer engaged in the business of supplying electricity; Finance Guru LLC proposes to sell electricity, natural gas, and related services in Citizens Electric, Duquesne, Met Ed, PECO (electric), Panlec, Penn Power, Pike, PPL, UGI, Wellboro, West Penn, Columbia Gas, National Fuel Gas, PECO (gas), Peoples Equitable, Peoples Natural Gas, Peoples Gas Company, Philadelphia Gas Works, UGI Utilities - Gas Div., and Valley Energy under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.
The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Finance Guru LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to Neil Pandey at the address listed below.
By and through Representative:
Neil Pandey, Legal Director
Finance Guru LLC
825 W. Monroe St, Suite 900
Chicago, IL 60661
312-788-8748

RECEIVED

AUG - 9 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PROOF OF PUBLICATION
In
THE ERIE TIMES-NEWS
COMBINATION EDITION

Harbor Compliance
1830 Colonial Village Lane
Lancaster PA 17601

REFERENCE: 96520 372099
PUC Notice

STATE OF PENNSYLVANIA)
COUNTY OF ERIE) SS:

Jennifer L. Trott, being duly sworn, deposes and says that: (1) he/she is a designated agent of the Times Publishing Company (TPC) to execute Proofs of Publication on behalf of the TPC; (2) the TPC, whose principal place of business is at 205 W. 12th Street, Erie, Pennsylvania, owns and publishes the Erie Times-News, established October 2, 2000, a daily newspaper of general circulation, and published at Erie, Erie County Pennsylvania; (3) the subject notice or advertisement, a true and correct copy of which is attached, was published in the regular edition(s) of said newspaper on the date(s) referred to below. Affiant further deposes that he/she is duly authorized by the TPC, owner and publisher of the Erie Times-News, to verify the foregoing statement under oath, and affiant is not interested in the subject matter of the aforesaid notice or advertisement, and that all allegations in the foregoing statement as to time, place and character of publication are true.

PUBLISHED ON: 07/31/19

TOTAL COST: \$610.00 AD SPACE: 0 Lines

FILED ON: 07/31/19

RECEIVED

AUG - 9 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PENNSYLVANIA PUBLIC UTILITY COMMISSION
NOTICE

Applications of Finance Guru LLC For Approval To Offer, Render, or Furnish Services as a Broker Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply Services, To The Public In The Commonwealth Of Pennsylvania.

Finance Guru LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/marketer engaged in the business of providing natural gas services. Finance Guru LLC will also be filing an application with the PUC for a license to supply electricity supply services (1) a broker/marketer engaged in the business of supplying electricity. Finance Guru LLC proposes to sell electricity, natural gas, and related services in Citizens' Electric, Duquesne, Met Ed, PECO (electric), Penelec, Penn Power, Pike, PPL, UGI, Wellshoro, West Penn, Columbia Gas, National Fuel Gas, PECO (gas), Peoples - Equitable, Peoples Natural Gas, Peoples Gas Company, Philadelphia Gas Works, UGI Utilities - Gas Div., and Valley Energy under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Finance Guru LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to Neil Pandey at the address listed below.

By and through Representative:
Neil Pandey, Legal Director
Finance Guru LLC
525 W. Monroe St, Suite 900
Chicago, IL 60661
312-796-9748

EP372099

Sworn to and subscribed before me this 31st day of July 2019

Affiant: Jennifer L. Trott

NOTARY: Barbara J. Moore

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Barbara J. Moore, Notary Public
City of Erie, Erie County
My Commission Expires March 23, 2020
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

AUG - 9 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

COMMONWEALTH OF PENNSYLVANIA }
County of Cambria } SS

PENNSYLVANIA PUBLIC UTILITY COMMISSION
NOTICE

Applications of Finance Guru LLC For Approval To Offer, Render, or Furnish Services as a Broker Engaged in The Business Of Supplying Natural Gas Supply Services and Electricity Supply Services, To The Public in The Commonwealth Of Pennsylvania.

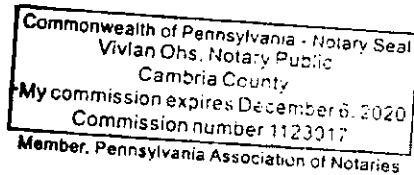
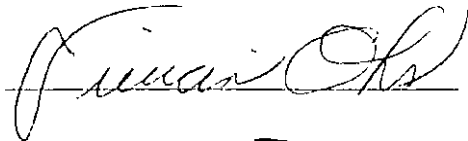
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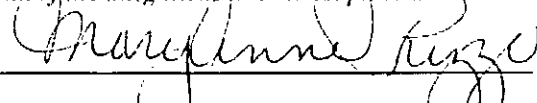
By and through Representative:
Neil Pandey, Legal Director
Finance Guru LLC
525 W. Monroe St, Suite 900
Chicago, IL 60661
312-796-9748

Signed and sworn to before me on
31st day of July, 2019,
by Mary Anne Rizzo making the statement.



On this 31st day of July A.D. 2019, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Mary Anne Rizzo, who being duly sworn according to law, deposes and says as Advertising Director of the Tribune-Democrat, Johnstown, PA, a newspaper of general circulation as defined by the "Newspaper Advertising Act", a merger September 8, 1952, of the Johnstown Tribune, established December 7, 1853; and of the Johnstown Democrat, established March 5, 1863.

ty of Cambria, and Commonwealth of Pennsylvania and e matter published in said publication in the regular issues . on July 30, 2019; and that the Affiant is not interested in at all of the allegations as to time, place and character of



STATEMENT OF ADVERTISING COSTS

0.00 Lines @ \$2.50 per line	0.00
7.5 Inches @ \$25.00 per inch	187.50
Notary Fee	5.00
Clerical Fee	2.50
Total Cost	195.00

To The Tribune-Democrat, Johnstown, PA
For publishing the notice or publication
attached hereto on the above stated dates.

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

_____ for publisher of _____
a newspaper of general circulation, hereby acknowledges receipt of the aforesaid
and publication costs and certifies that the same has been duly paid.

(Name of Newspaper)

By _____

Proof of Publication of Notice in Pittsburgh Post-Gazette

Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss D. Rullo, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

31 of July, 2019

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

COPY OF NOTICE OR PUBLICATION

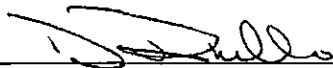
PENNSYLVANIA PUBLIC UTILITY COMMISSION
NOTICE

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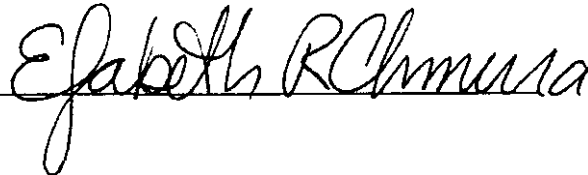
The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Finance Guru LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to Neil Pandey at the address listed below.

By and through
Representative
Neil Pandey, Legal Director
Finance Guru LLC
525 W. Monroe St, Suite 900
Chicago, IL 60661
312-796-9748



PG Publishing Company

Sworn to and subscribed before me this day of:
July 31, 2019



Elizabeth R. Chmura

Commonwealth of Pennsylvania - Notary Seal
Elizabeth R. Chmura, Notary Public
Allegheny County
My commission expires February 8, 2022
Commission number 1326781
Member, Pennsylvania Association of Notaries

RECEIVED
 AUG - 9 2019
 PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU

STATEMENT OF ADVERTISING COSTS
 Harbor Compliance
 1830 Colonial Village Lane
 Lancaster Pennsylvania 17601

To PG Publishing Company

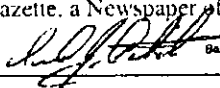
Total ----- \$519.25

Publisher's Receipt for Advertising Costs

PG PUBLISHING COMPANY, publisher of the Pittsburgh Post-Gazette, a newspaper of general circulation, hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

Office
2201 Sweeney Drive
CLINTON, PA 15026
Phone 412-263-1338

PG Publishing Company, a Corporation, Publisher of
Pittsburgh Post-Gazette, a Newspaper of General Circulation

By  Samuel J. Arbuthnot

I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

The Scranton Times (Under act P.L. 877 No 160. July 9, 1976)
Commonwealth of Pennsylvania, County of Lackawanna

HARBOR COMPLIANCE
AMANDA GORDON
1830 COLONIAL VILLAGE LANE LANCASTER PA 17601

17601

Account # 630132
Order # 82358204
Ad Price: 301.20

RECEIVED

AUG - 9 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

LEGAL NOTICE PENNSYLVANIA

Ann Marie Fortese

Being duly sworn according to law deposes and says that (s)he is Billing clerk for The Scranton Times, owner and publisher of The Scranton Times, a newspaper of general circulation, established in 1870, published in the city of Scranton, county and state aforesaid, and that the printed notice or publication hereto attached is exactly as printed in the regular editions of the said newspaper on the following dates:

07/30/2019

Affiant further deposes and says that neither the affiant nor The Scranton Times is interested in the subject matter of the aforesaid notice or advertisement and that all allegations in the foregoing statement as time, place and character or publication are true Ann Marie Fortese

Sworn and subscribed to before me
this 30th day of July A.D., 2019

Sharon Venturi

(Notary Public)

Commonwealth of Pennsylvania - Notary Seal
Sharon Venturi, Notary Public
Lackawanna County
My commission expires February 12, 2022
Commission number 1254228
Member, Pennsylvania Association of Notaries

LEGAL NOTICE

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE
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By and through Representative:
Neil Pandey, Legal Director
Finance Guru LLC
625 W. Monroe St, Suite 900
Chicago, IL 60661
312-798-9748

PROOF OF PUBLICATON OF NOTICE IN THE WILLIAMSPORT
 SUN-GAZETTE UNDER ACT NO. 587, APPROVED MAY 16, 1929

STATE OF PENNSYLVANIA

COUNTY OF LYCOMING

SS:

Robert O. Rolley, Jr., Publisher of the Sun-Gazette LLC publishers of the Williamsport Sun-Gazette, successor to the Williamsport Sun and the Gazette & Bulletin, both daily newspapers of general circulation, published at 252 West Fourth Street, Williamsport, Pennsylvania, being duly sworn, deposes and says that the Williamsport sun was established in 1870 and the Gazette & Bulletin was established in 1801, since which dates said successor, the Williamsport Sun-Gazette, has been regularly issued and published in the County of Lycoming aforesaid, and that a copy of the printed notice is attached hereto exactly as the same was printed and published in the regular editions of said Williamsport Sun-Gazette on the following dates, viz:

July 31, 2019

Affiant further deposes that he is an officer daily authorized by the Sun-Gazette LLC, publisher of the Williamsport Sun-Gazette, to verify the foregoing statement under oath and declare that affiant is not interested in the subject matter of the aforesaid notice of publication, and that all the allegations in the foregoing statement as to time, place and character of publication are true.

**PENNSYLVANIA
 PUBLIC UTILITY
 COMMISSION
 NOTICE**

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By and through
 Representative:
 Neil Pandey, Legal
 Director
 Finance Guru LLC
 525 W. Monroe St,
 Suite 900
 Chicago, IL 60661
 312-798-9748

Robert O. Rolley, Jr.
 SUN-GAZETTE LLC

Sworn to and subscribed before me

The 2nd day of August, 2019

Beth A. Miller
 COMMONWEALTH OF PENNSYLVANIA Notary Public

NOTARIAL SEAL
 BETH A MILLER
 Notary Public
 CITY OF WILLIAMSPORT, LYCOMING COUNTY
 My Commission Expires Apr 18, 2020

STATEMENT OF ADVERTISING COSTS

To the Sun-Gazette LLC, Dr.:
 For publishing the notice attached
 Hereto on the above state dates \$ 307.48
 Probated same... \$
 Total \$ 307.48

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

THE SUN-GAZETTE LLC hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid

SUN-GAZETTE LLC

BY Robert O. Rolley, Jr.

RECEIVED

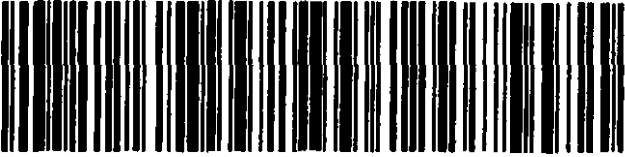
AUG - 9 2019

PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU

LING BOX

DOMESTIC AND INTERNATIONAL USE

PRIORITY MAIL
POSTAGE REQUIRED

 UNITED STATES POSTAL SERVICE®	www.pitneybowes.com	
P	US POSTAGE 08/09/2019 From 17601	
	Pitney Bowes ComBasPrice Medium FR Box	026W0004897358 9058356670
PRIORITY MAIL 1-DAY™		
Jeannette Miller Harbor Compliance 1830 Colonial Vlg Ln Lancaster PA 17601-6700		Estimated Delivery Date: 08/10/2019 0005
C000		
PA PUBLIC UTILITY COMMISSION SECRETARY ROSEMARY CHIAVETTA 400 NORTH ST, KEYSTONE BUILDING HARRISBURG PA 17120-0001		
USPS TRACKING #		
		
9405 5098 9864 3045 3682 93		