

Charita Bush
1339 Adams Street
Pittsburgh, PA 15233
412-401-5484 Mobile
Charita7@aol.com

November 12, 2019

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

RE: Charita Bush v. Pittsburgh Water and Sewer Authority
Docket No. C-2019-3013323

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Charita Bush's Answer to Preliminary Objections and New Matter with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

Charita Bush

cb

Enclosure

cc: Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Charita Bush's Answer to Preliminary Objections and New Matter upon the persons listed below in the manner indicated with the requirements of 52 Pa. C.S. 1.54

Via First Class Mail and Email

Kristine E. Marsilio, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
kmarsilio@eckertseamans.com

Via First Class Mail and e-File

Hon. Charles E. Rainey, Jr.,
Administrative Law Judge
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Dated: November 11, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Charita Bush,	:	
	Complainant	Docket No. C-2019-3013323
	:	
v.	:	
	:	
Pittsburgh Water and Sewer Authority,	:	
Respondent	:	

**CHARITA BUSH'S
ANSWER TO PRELIMINARY OBJECTIONS AND NEW MATTER**

Pursuant to 52 Pa. Code § 5.61, Charita Bush (“Ms. Bush” or “Complainant” or “I”) submits this Answer to the Preliminary Objections and New Matter of The Pittsburgh Water and Sewer Authority (“PWSA” or “Authority” or the “Company”). In support of this Answer, Ms. Bush avers as follows: §§

INTRODUCTION

Ms. Bush filed a Formal Complaint against the PWSA with the Pennsylvania Public Utility Commission (“Commission”), which was served on PWSA on October 3, 2019. I assert the PWSA was negligent in failing to shut-off water service to my property on three occasions, resulting in a pipe bursting on my inherited property and causing damage thereto. I seek to be released from payments related to the consumption of water that occurred when the pipe burst. I also seek to be reimbursed for “loss and damages” that resulted from the alleged pipe bursting incident.

Ms. Bush is not the Account Holder of the subject account, as this is a leased property. Ms. Bush, however, is the Executrix for the estate of the Deed Holder, Charles Bush. Subsequently, Ms. Bush is the inherited property Owner of the subject account. Ms. Bush has the fiduciary duty to take action to protect the assets of the aforementioned estate justifying her representation. Nevertheless, with all debts of estate satisfied, Ms. Bush, as a consumer of the Authority, has the right and responsibility to question or disagree with the Authority according to the PUC Guide.¹ I should be heard despite not being an attorney. Ms. Bush made numerous attempts to obtain legal representation, with no avail.²

The Commission does not have jurisdiction to determine “negligence” or to award damages, however they can require the Authority to provide credits to the benefit of Ms. Bush. The Commission can also find the Authority liable in accordance with 42 Pa.C.S. § 8542. As a result of this catastrophic incident, Ms. Bush was forced to sell the home. The credit that remains on the account are of no benefit to Ms. Bush. According to the Authority, they have waived \$1,883.42 for high usage from January 23, 2019 through February 5, 2019 on the subject account. The Authority also admits to applying a further adjustment in the amount of \$257.98 on September 26, 2019, due to the delayed termination of service. The Authority confirms a current account balance is a credit in the amount of \$457.98. The Authority failed to note their acceptance of \$762.88 on September 26, 2019 from the selling of the subject account property.

As such, Ms. Bush respectfully requests that the Commission (a) finds the Authority liable in causing damage to the property; (b) refund monies accepted on September 26, 2019; (c) apply the subject account credit to Complainant account at 1339 Adams Street, Pgh, Pa 15233;

¹ *Your Rights and Responsibilities as a Utility Consumer Guide* issued by the PUC.

http://www.puc.state.pa.us/General/consumer_ed/pdf/Consumer_Rights_Responsibilities.pdf

² Thomas, Rhodes & Cowie, PC, 1010 Two Chatham Center, Pgh, PA 15219 (412) 316-8651

and (d) requests that the Office of Administrative Law Judge issue an order directing the Authority to contact the Complainant in an attempt to resolve this matter. Notwithstanding Ms. Bush not being represented by Counsel, financial hardship should be a consideration for permitting alternative representation.

ANSWER

1. The Authority's knowledge of the utility account number and service address is accurate. To the best of the Complainant's knowledge, the Customer of Record was Dorothy Smith. Ms. Smith has resided at 1448 N. Franklin Street, the service address since 1988 (Attachment A & B). Ms. Bush's Grandmother, Beatrice Bush, is deceased (Attachment C). The deed for 1448 N. Franklin includes the names: Beatrice Bush, Thomas Bush and Charles Bush. The deed is written "And", which denotes ownership going to surviving parties (Attachment D). Ms. Bush's father, Charles Bush, was the last surviving party. Upon his death, Ms. Bush was named Executrix and inherited the property (Attachment E).

2. The Authority is regulated as a public utility by the Commission. Under 32 of the Public Utility Code, the Commission has jurisdiction over the provision of water and wastewater conveyance service by the Authority.

3. The Authority provides residential water service to the subject property.

4. Ms. Bush affirms that the PWSA acted "negligently" in failing to shut off water service to the subject property and are liable for the resulted damages. The Authority requested Ms. Bush to complete a form with contact information but failed to make contact. The Authority claims that it is not responsible for a delayed shut off, however Ms. Bush affirms the Authority would have never acted on the request if not for this incident. Ms. Bush has a 44 second video taken after entering the subject property on January 27, 2019 to affirm the incident occurred and documented damage. The Authority can access this video by providing Ms. Bush address information. Ms. Bush was accompanied by two people: Kim Williams (412.726.9938) and Rallo (412.606.3455). Rallo is a young man who was in negotiation with Ms. Bush to barter handy services for a place to live.

- (a) Ms. Bush cannot confirm or deny that Beatrice Bush (“Beatrice”) contacted Customer Service to request the water be shut off. If Authority affirms call was received, I do not dispute. Ms. Bush has an older sister named Beatrice Bush.
 - (b) On September 28, 2018, Ms. Bush sent an email (Attachment A) to the Authority, identifying herself and requesting information about shutting off the water. A form was completed and faxed to the Authority. On October 1, 2018, another form was completed and faxed to the Authority (Attachment F). Ms. Bush contacted the Authority to pay fee, to no avail. On December 18, 2018, an email was sent to the Authority requesting again for the service to be shut off (Attachment G). Ms. Bush received a phone call from the Authority on aforementioned date, confirming that the shut-off would occur the morning of December 19, 2018 (Attachment H).
 - (c) The Authority admits to discovering on December 19, 2018 that they were unable to shut off service. The Authority knew there would be a delay and failed to contact Ms. Bush with this pertinent information. The Authority would not address Ms. Bush’s numerous requests or attempt to make contact. The Authority shut off service to the subject property on February 1, 2019; five days after Ms. Bush discovered the burst pipes at the subject property.
 - (d) PWSA’s records indicate that high consumption occurred from January 23, 2019 through February 1, 2019. It should be confirmed that the pipes burst on January 23, 2019 and remained running until discovered by Ms. Bush on January 27, 2019. As the Authority confirmed, 77,000 gallons of water emptied in the subject property, generating a billing statement of \$1,88.98.
5. The Authority denies being liable for the damages resulting from their negligence, and I disagree. The *Your Rights and Responsibilities as a Utility Consumer* guide includes a section entitled *If You’ll Be Away From Home*. The section details the responsibility of a consumer to contact the Authority to make arrangements and allow them access to the utility box. Ms. Bush satisfied her obligation as a consumer. Ms. Bush made every attempt to have the Authority shut off service to the subject property. The Authority’s admission to the “delayed termination of service” acknowledges their control of subject property pursuant to 42 Pa. C.S. § 8542 (b) (2). PWSA has waived all

water and sewer conveyance charges, as well as consumption based sewage charges, for the period of high usage from January 23, 2019 through February 5, 2019 because of the delayed termination of service. Ms. Bush is appreciative. Ms. Bush also disputes that there was a delay in service; the request was only executed after this incident. Ms. Bush's numerous requests were ignored. According to the Authority, this waiver resulted in a total credit in the amount of \$1,883.42; and additional adjustments in the amount of \$257.98 to the account on September 26, 2019. The Authority failed to disclose that they accepted a check in the amount of \$762.88 from PV Settlement, as a result of the premature sale of the property. The check cleared on September 28, 2019 (Attachment I). These monies should be returned back to Ms. Bush. Any credits remaining on the subject account should be returned to Ms. Bush or credited to her account with the Authority. This property has been in the family for 30 years. Ms. Bush inherited this property and associated debt. Ms. Bush, a homeowner herself, has been diligently paying down the inherited taxes in an effort to move to making repairs and acquiring a tenant. Ms. Bush paid nearly \$4,000 between December 2018 and August 2019, and had one (1) payment remaining to bring taxes current (Attachment J). The bursting of a pipe at subject property created a catastrophic event for Ms. Bush, consequently causing loss and damages. On January 27, 2018, "Rallo", a witness to Ms. Bush approaching the frozen door and visually seeing water running down the door window at subject property, was unable to move in to subject property and Ms. Bush lost rental income. The extensive damage to subject property derailed Ms. Bush's efforts and created a hardship in which she was unable to recover. As a result, Ms. Bush

sold the subject property on September 19, 2019 for \$2,607.84 (Attachment K). The

subject property is now advertised on the market for \$58,900 (Attachment L).

6. Ms. Bush does not have a court granted Protection from Abuse order that is currently in effect.

7. a. Ms. Bush did file an Informal Complaint with BCS. After a discussion with “Tim” of BCS, Ms. Bush decided to pursue the issue at the formal level.

b. It is denied that Ms. Bush has spoken to PWSA about this complaint. She has never been verbally contacted by the Authority. The Authority did send a copy of her December 18th form with a cover letter stating that they are not responsible.

c. The Authority admits that after shut off, the subject account was not reflected in PWSA’s billing system and was still billing the account for consumption charges, although service was discontinued. There still remains unaccounted for monies on subject account from all disclosed credits, adjustments, and settlement check acceptance for subject account. This amount could range from \$104.90 to \$562.88. The Authority should be required to provide an itemized account of all activity on the subject account from November 2018 through November 12, 2019. All overages should be granted to Ms. Bush and/or applied to Complaint’s account with the Authority. This is to include the current account balance credit in the amount of \$457.98. The Authority should also be required to rectify the bills with Alcosan, as it was their delay in shutting off service to subject property.

8. No response by Ms. Bush was required.

9-10. Ms. Bush’s verification and formal complaint filing information was received and no response was required.

NEW MATTER

11. To Ms. Bush's knowledge, the Customer of Record for the subject account is Dorothy Smith; and formerly Ada Smith. Both were tenants of the subject property. The Authority should be required to show proof to whom bills were addressed and to what address they were sent. The Authority should also provide proof of consecutive payments received from subject account prior to January 2018.

12. Ms. Bush identified herself as the Executrix and owner of the subject property. The Authority failed to request any documentation. The Authority validated Ms. Bush's identification by providing information and acting on her shut off request.

13. Ms. Bush did not reside at subject property.

14. Ms. Bush satisfied ownership with the Commonwealth of Pennsylvania and was able to execute a "Recovery of Real Property" proceeding against tenants at subject property. All relevant documentation was submitted for filing; verified, and judgement upheld.

15. When ownership was acquired in 2011, the tenants were provided a lease that they never signed. A copy of the lease does exist.

16. Ms. Bush obtained information on the subject account by contacting PWSA on September 27, 2019. Ms. Bush received information for the service dates July 31, 2019 through August 27, 2019, in which the final bill was \$521. I was told a final bill would total \$562.88 for consumption charges and sewer maintenance. Based on this information, Ms. Bush concluded that service was not shut off at the subject property; all while this complaint is being conducted. The Authority should be required to provide

proof of address to where the PWSA bill was sent to the alleged Customer of Record (Beatrice Bush). Beatrice Bush was deceased as of January 17, 2005.

17. Ms. Bush is the Executrix of Charles Bush Estate. Charles Bush was the owner of subject property by way of the deed. Ms. Bush inherited the subject property in September 2011 with the death of her father. In addition, Charles Bush was the Power of Attorney for alleged Customer of Record (Beatrice Bush). Ms. Bush has the right to challenge the usage at the Premises and any bills for service provided to the Premises.

18. The Law Requires the Estate to Have Legal Representation, however, all tax requirements for the Estate have been satisfied. The subject property was to be moved in Ms. Bush's name as attested in a motion filed by Jordan Tax (Attachment M). The Authority never requested proof of Ms. Bush's representation of Executrix.

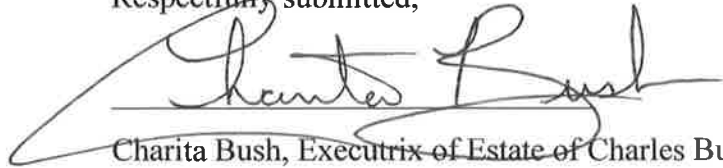
19.-23. Ms. Bush made attempts to gain legal representation, with no avail. If granted additional time, Ms. Bush will make further attempts. It should be noted that Ms. Bush has fiduciary responsibility to protect the assets of the estate. As owner of subject property, Ms. Bush should have the opportunity to gain possession of refunds, credits, and claim loss for damages due to imposed liability under 42 Pa. C.S. § 8542. If it is withheld that an Estate remains in effect, Ms. Bush should be permitted a reasonable time frame to obtain legal representation. If this complaint is dismissed, it should be dismissed without prejudice.

24.-26. Ms. Bush has attached Letters of Testamentary for subject property. It is disputed that the Account Holder is Beatrice Bush. Ms. Bush no longer owns the property. All overage payments, credits and loss damages should be provided to Ms. Bush in payment and/or to current account with the Authority.

CONCLUSION

WHEREFORE, Ms. Bush respectfully request that the Commission (a) finds the Authority liable in causing damage to the property; (b) refund monies accepted on September 26, 2019; (c) apply the subject account credit to Complainant account at 1339 Adams Street, Pgh, Pa 15233; and (d) requests that the Office of Administrative Law Judge issue an order directing the Authority to contact the Complainant in an attempt to resolve this matter associated with loss and damages. If said complaint is dismissed, it should be done without prejudice. The Authority ignored numerous requests and would have continued to ignore the requests if not for this incident occurring. PWSA failed to notify Ms. Bush using the contact information on their forms. Ms. Bush welcomes the opportunity to resolve this matter. Ms. Bush should be provided reasonable time to obtain legal representation as necessary. Ms. Bush has provided documentation of her role as Executrix of the Estate of subject property. Ms. Bush has suffered a tremendous loss and should be afforded the opportunity to exercise her fiduciary responsibility. Ms. Bush request that the Office of Administrative Law Judge issue a conference directing the Authority to attempt to resolve the case.

Respectfully submitted,

A handwritten signature in cursive script that reads "Charita Bush". The signature is written in black ink and is positioned above a horizontal line.

Charita Bush, Executrix of Estate of Charles Bush

1339 Adams Street

Pittsburgh, PA 15233

(412) 401-5484

Charita7@aol.com

Complainant

Date: November 12, 2019

Attachment A

From: info <info@pgh2o.com>
To: 'charita7@aol.com' <charita7@aol.com>
Subject: RE: Property 1448 Franklin ST
Date: Fri, Sep 28, 2018 3:31 pm
Attachments: Residential Water Service Shut Off Requested.pdf (32K)

Dear Charita:

Thank you for your email to The Pittsburgh Water and Sewer Authority.

The balance on the account is \$82.28 as of today (the last billing for the service dates of 7/30/18 – 8/30/18) attached is the Residential Water Service Shut Off Request.

You will still have an monthly bill if the water is shut at the curb (minimum charge of \$5.20 for zero consumption) you will also have another bill for the service dates of 8/31/18 – 9-29-18 which has not generated yet.

If you have any questions, please contact Customer Service at 412.255.2423, please press 5, or via email at info@pgh2o.com. Office hours are Monday through Friday 8:00 am to 6:00 pm. We aim to enhance Pittsburgh's quality of life by providing quality water and appreciate the opportunity to serve you. We appreciate your business.

Sincerely,

Customer Service

From: charita7@aol.com [mailto:charita7@aol.com]
Sent: Friday, September 28, 2018 1:45 PM
To: info
Subject: Property 1448 Franklin ST

Good afternoon,



**Recovery of Real Property Hearing
Notice**

Mag. Dist. No: MDJ-05-2-40
MDJ Name: Honorable Derwin Rushing
Address: 421 East Ohio Street
Pittsburgh, PA 15212
Telephone: 412-321-0788

Charita Bush
v.
Dorothy Smith and All Others

Charita Bush
1339 Adams Street
Pittsburgh, PA 15233

Docket No: MJ-05240-LT-0000323-2018
Case Filed: 9/24/2018

A Recovery of Real Property Hearing has been scheduled for the above captioned case to be held on/at:

Date: Wednesday, October 3, 2018	Place: Magisterial District Court 05-2-40, Pittsburgh 421 East Ohio Street Pittsburgh, PA 15212 412-321-0788
Time: 9:00 AM	

Notice To Defendant

A landlord/tenant complaint has been filed against you for the recovery of possession of real property, and or money and damages associated with the above captioned case.

If you have a defense to this complaint, you may present it at the hearing.

If you have a claim against the plaintiff arising out of the occupancy of the premises, which is within the jurisdiction of the magisterial district judge and which you intend to assert at the hearing, you must file it on a complaint form at this office before the time set for the hearing.

If you do not appear at the hearing, a judgment for possession and costs, and for damages and rent if claimed, may nevertheless be entered against you. A judgment against you for possession may result in your eviction from the premises.

September 24, 2018

Date

Magisterial District Judge Derwin Rushing



If you are disabled and require a reasonable accommodation to gain access to the Magisterial District Court and its services, please contact the Magisterial District Court at the above address or telephone number. We are unable to provide transportation.





LANDLORD/TENANT COMPLAINT

Mag. Dist. No: MDJ-05-2-40
 MDJ Name: Honorable Derwin Rushing
 Address: 421 East Ohio Street
 Pittsburgh, PA 15212
 Telephone: 412-321-0788

PLAINTIFF: NAME and ADDRESS
 Charita Bush
 1339 Adams Street
 Pittsburgh PA 15233
 DEFENDANT: NAME and ADDRESS
 Dorothy Smith (+ family)
 1448 N. Franklin Street
 Pittsburgh PA 15233
 Docket No: 4-323-18
 Case Filed: 9-24-18

	AMOUNT	DATE PAID
FILING COSTS	\$ _____	/ /
POSTAGE	\$ _____	/ /
SERVICE COSTS	\$ _____	/ /
CONSTABLE ED.	\$ _____	/ /
TOTAL	\$ _____	/ /

Pa.R.C.P.M.D.J. No. 206 sets forth those costs recoverable by the prevailing party.

TO THE DEFENDANT: The above named plaintiff(s) asks judgment together with costs against you for the possession of real property and for:

Lease is Residential Nonresidential Monthly Rent \$ 500.00 Security Deposit \$ 0
 A determination that the manufactured home and property have been abandoned.
 A Request for Determination of Abandonment (Form MDJS 334) must be completed and submitted with this complaint.
 Damages for injury to the real property, to wit: _____

unknown at this time in the amount of: \$ _____
 Damages for the unjust detention of the real property in the amount of: unknown at this time \$ _____
 Rent remaining due and unpaid on filing date in the amount of \$ _____
 And additional rent remaining due and unpaid on hearing date \$ 500.
 Attorney fees in the amount of \$ _____

THE PLAINTIFF FURTHER ALLEGES THAT:

- Total: \$ 500.
- The location and the address, if any, of the real property is: 1448 N. Franklin Street
 - The plaintiff is the landlord of that property.
 - The plaintiff leased or rented the property to you or to Dorothy Smith under whom you claim.
 - Notice to quit was given in accordance with law, or
 No notice is required under the terms of the lease.
 - The term for which the property was leased or rented is fully ended, or
 A forfeiture has resulted by reason of a breach of the conditions of the lease, to wit: _____ or, _____
 - Rent reserved and due has, upon demand, remained unsatisfied.
 - You retain the real property and refuse to give up to its possession.

I, Charita Bush verify that the facts set forth in this complaint are true and correct to the best of my knowledge, information and belief. This statement is made subject to the penalties of Section 4904 of the Crimes Code (18 PA. C.S. § 4904) relating to unsworn falsification to authorities.

I certify this filing complies with the UJS Case Records Public Access Policy.

Charita Bush
(Signature of Plaintiff)

The plaintiff's attorney shall file an entry of appearance with the magisterial district court pursuant to Pa.R.C.P.M.D.J. 207.1

IF YOU HAVE A DEFENSE to this complaint you may present it at the hearing. IF YOU HAVE A CLAIM against the plaintiff arising out of the occupancy of the premises, which is in the magisterial district judge jurisdiction and which you intend to assert at the hearing, YOU MUST FILE it on the complaint form at the office BEFORE THE TIME set for the hearing. IF YOU DO NOT APPEAR AT THE HEARING, a judgment for possession and costs, and for damages and rent if claimed, may nevertheless be entered against you. A judgment against you for possession may result in your EVICTION from the premises.

If you are disabled and require a reasonable accommodation to gain access to the Magisterial District Court and its services, please contact the Magisterial District Court at the above address or telephone number. We are unable to provide transportation.



WARNING: It is illegal to duplicate this copy by photostat or photograph.

Attachment C

Calvin B. Johnson, M.D., M.P.H. Secretary of Health



Charles Hardester

Charles Hardester State Registrar

JAN 19 2005

Date

No.

H105.143 Rev. 2/87

COMMONWEALTH OF PENNSYLVANIA • DEPARTMENT OF HEALTH • VITAL RECORDS CERTIFICATE OF DEATH

PRINT IN INK

Form with fields for Name of Decedent (Beatrice Bush), Age (88), Sex (Female), Social Security Number (258-12-9923), Date of Death (January 17, 2005), Birthplace (Tifton, GA), Facility Name (University of Pittsburgh Medical Center), County of Death (Allegheny), Decedent's Usual Occupation (Homemaker), Decedent's Education (College), Marital Status (Widowed), Race (Black), Mailing Address (1119 Fulton Street, Pittsburgh, PA 15233), Father's Name (Eula C. Bryant), Informant's Name (Doris Bush Velar), Method of Disposition (Burial), Date of Disposition (1-22-2005), Place of Disposition (Allegheny Cemetery), Signature of Funeral Home (Carol Baker), License Number (F.D. 014150-L), Name and Address of Facility (Jones F.H. 2644 Wylie Ave Pgh, PA 15219), License Number (MT 183680), Date Signed (January 17, 2005), Part I (Hypotension, Sepsis, Malnutrition, End stage renal disease), Manner of Death (Natural), Date of Injury, Time of Injury, Injury at Work?, Describe how injury occurred, Certifying Physician (John M.D.), Pronouncing and Certifying Physician (Yvonne Chan, M.D.), Medical Examiner/Coroner, Registrar's Signature and Number.

22 J 342

22 J-342
 BLOCK & LOT NO.
 RECORDED REGISTRY
 Made
 Custodian
 DATE: 6/1/88
 No. 89 DEED-Adoption Reg. Co. Ber Amer.
 Copyright 1987, P. O. No. 10, Sch., PA 15219

This Indenture

day of March

19 88 .

Kevin Dickey and Bobbie J. Dickey h's wife
of the County of Allegheny and
Commonwealth of Pennsylvania

part ies of the first part and

Beatrice Bush and Charles Bush and Thomas Bush Jr., joint tenants,
of the County of Allegheny and
Commonwealth of Pennsylvania

part ies of the second part:

Witnesseth, that the said part ies of the first part, in consideration of
Twenty Two Thousand (\$22,000.00) Dollars

to them now paid by the said part ies of the second part, do grant, bargain, sell
and convey unto the said part ies of the second part, Their successors and assigns,

All that certain lot or piece of ground situate in the City of
Pittsburgh, 21st Ward, Allegheny County, Commonwealth of
Pennsylvania being known as Lot No. 2, Parcel "A" in the
Manchester Community Development Corporation Plan No. 1 as
recorded in the Recorder's Office of Allegheny County,
Pennsylvania in Plan Book Volume 87, Page 56, bounded and
described as follows, to-wit:

Beginning at a point, said point being at the Northerly right of way
of Franklin Street and the Easterly right of way of Chateau Street;
thence along the Easterly right of way line of Chateau Street, North 13
degrees 15 minutes 52 seconds 17 minutes West, a distance of 87.74 feet
to a point, said point being on the dividing line between Lot No. 1 and
Lot No. 2; thence along said dividing line, North 76 degrees 23 minutes
53 seconds East, a distance of 31.22 feet to a point; thence through Lot
No. 2 along Parcel "B" and partially through a party wall, South 13
degrees 36 minutes 7 seconds West, a distance of 87.74 feet to a point
on the Northerly right of way line of Franklin Street; thence along
aforecaid right of way line, South 76 degrees 23 minutes 53 seconds
West, a distance of 30.81 feet to a point, said point being the point
of beginning.

Having erected thereon a dwelling known and numbered as 1448 North Franklin Street, Pittsburgh, Penna. 15233

Being known and designated in the Deed Registry Office of Allegheny County, Pennsylvania as Lot and Block NO. 22-J-342.

Subject to party walls and rights of adjoining Landowners in and to said party walls.

Being the same property David E. Howe and Joan F. Howe, his wife, granted and conveyed unto KEvin DICkey and BOBBie J. DICkey, his wife GRANT herein, by Deed dated October 6, 1987, and recorded in the recorder's office of Allegheny County in Deed Book Volume 7622 Page 279.

21
1/14

00022

REVENUE TRANSFER TAX

DEPARTMENT OF REVENUE

COMMONWEALTH OF PENNSYLVANIA

REVENUE TRANSFER TAX

220.00

220.00

Cash \$440

CITY OF PITTSBURGH

DEED TRANSFER TAX

No. 184565

AMT \$ 22.00

REC'D 330.00

WARD BLOCK & LOT NO. 22-J-342

DEED TRANSFER TAX

COUNTY OF ALLEGHENY

A002039

MUN.

BORO 26 Pittsburgh

TWP.

SCHOOL 5071

DIST.

CITY

AMT. \$ 22.00

110.00

100

REC'D

CASH

CHECK

MICHAEL A. DELLA VECCHIA, COUNTY AGENT

BY *[Signature]*

FORM 20

DEPARTMENT OF COURT RECORDS, WILLS/ORPHANS' COURT DIVISION

COMMONWEALTH OF PENNSYLVANIA

ALLEGHENY COUNTY

SS: No.: 1964018

No. 021301391

I, Michael McGeever, Director of the Department of Court Records in and for the County of Allegheny in the Commonwealth of Pennsylvania, DO HEREBY CERTIFY that on the

28th day of February, 2013 LETTERS OF TESTAMENTARY

on the Estate of CHARLES BUSH,

deceased, were granted to CHARITA BUSH

having first been qualified well and truly to administer the same. And, I further certify that no revocation of said Letters appears of record in my office.

Date of Death 9/27/2011

Social Security No. 172-32-5363

Given under my hand and seal of office, at Pittsburgh

this 27th day of September 2017



Director, Department of Court Records


Clerk

NOT VALID WITHOUT ORIGINAL SIGNATURE AND IMPRESSED SEAL



Residential Water Service Shut-Off Request

I, Charita Bush, the Owner or Authorized Agent of the Owner
Name (Please Print)

request that the water service at the following vacant residence be terminated.

1448 Franklin St, Pgh PA 15233

Property Address

Tenant: Dorothy Smith (412) 401-5484

Current Account Number

Owner's Telephone Number

10/12/18

Date Service Should Be Terminated

Important Information - Please Read

- I understand that there is a \$50.00 charge for the termination of service.
- I understand that it is the owner's responsibility to verify that water service has been terminated. The Pittsburgh Water and Sewer Authority is not responsible for damages or water charges if service termination is not accomplished.
- I understand that an inoperable curb stop (fixture at which water is shut-off) may delay the termination of service.
- I understand that all water valves on the customer's side of the line should also be closed.
- I understand that any prior charges must be paid and that penalty and interest will accrue on any unpaid charges.
- I understand that there will be no minimum charge for water service availability after service is terminated.
- I understand that minimum charges for sewage will continue after water service is terminated.
- I understand that, after water service is terminated, service will not be restored unless the Owner or Owner's Authorized Agent is physically present at the time of service restoration.

The undersigned Owner or Authorized Agent on behalf of the property owner hereby releases The Pittsburgh Water and Sewer Authority, including its offices, employees and agents from any and all liability related to the termination of water service, the failure to terminate water service or the restoration of water service at the address shown above.

Owner or Authorized Agent

10/1/18

Date

BCS Case # 3676588

5

Attachment G

From: info <info@pgh2o.com>
To: 'charita7@aol.com' <charita7@aol.com>
Subject: RE: 1448 Franklin St: Termination of Service
Date: Tue, Dec 18, 2018 3:30 pm

Thank you for your email to The Pittsburgh Water and Sewer Authority. This information has been forwarded to the appropriate department for review. We appreciate your patience while the requested information is researched. If you have any questions, please contact Customer Service at 412.255.2423, please press 5, or via email at info@pgh2o.com. Office hours are Monday through Friday 8:00 am to 6:00 pm. We aim to enhance Pittsburgh's quality of life by providing quality water and appreciate the opportunity to serve you. We appreciate your business.

Sincerely,

Customer Service

From: charita7@aol.com [mailto:charita7@aol.com]
Sent: Tuesday, December 18, 2018 10:50 AM
To: info
Subject: 1448 Franklin St: Termination of Service

Good morning,

My name is Charita Bush, and I'm the owner of 1448 Franklin St, 15233. I had requested the water be shut-off as of October 12th, however it has not yet been done. I submitted the attached request on October 1st. Can you please shut it off and/or let me know what additionally I need to do? I didn't see a bill for \$50 at the address, so please let me know how that is to be submitted. You can send it to 1339 Adams Street, Pittsburgh, PA 15233, or contact me (412) 401-5484 to make the payment.

No one is at the home and I don't want to incur fees other than what the tenant ran out on- which was \$83, approximately.

Thanks,

BCS Case #367658

Charita Bush

412.401.5484 | Samsung Galaxy S8

Attachment H (b)

Talk activity

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges	Total
Dec 12	11:34 PM	412.498.8967	Pittsburgh, PA	Incoming, CL	26	--	--	--
Dec 13	12:07 AM	412.498.8967	Pittsburgh, PA	Incoming, CL	1	--	--	--
Dec 13	2:32 PM	412.478.1964	Pittsburgh, PA	Incoming, CL	1	--	--	--
Dec 13	5:41 PM	412.403.0551	Pittsburgh, PA	Incoming, CL	2	--	--	--
Dec 14	9:17 AM	954.789.4738	Pittsburgh, PA	FtLauderdl, FL	5	--	--	--
Dec 14	2:51 PM	412.409.2002	Pittsburgh, PA	Incoming, CL	1	--	--	--
Dec 14	5:10 PM	954.789.4738	Pittsburgh, PA	FtLauderdl, FL	4	--	--	--
Dec 14	5:13 PM	412.478.1964	Pittsburgh, PA	Pittsburgh, PA	1	--	--	--
Dec 14	5:14 PM	412.403.0551	Pittsburgh, PA	Pittsburgh, PA	10	--	--	--
Dec 14	5:38 PM	954.789.4738	Pittsburgh, PA	FtLauderdl, FL	2	--	--	--
Dec 14	5:48 PM	412.478.1964	Pittsburgh, PA	Pittsburgh, PA	1	--	--	--
Dec 14	5:50 PM	412.478.1964	Pittsburgh, PA	Incoming, CL	3	--	--	--
Dec 14	6:17 PM	412.403.0551	Pittsburgh, PA	Incoming, CL	8	--	--	--
Dec 15	3:37 PM	412.478.1964	Pittsburgh, PA	Incoming, CL	3	--	--	--
Dec 16	1:51 PM	954.789.4738	Pittsburgh, PA	Incoming, CL	1	--	--	--
Dec 16	2:55 PM	412.403.0551	Pittsburgh, PA	Pittsburgh, PA	1	--	--	--
Dec 16	3:02 PM	412.726.9938	Pittsburgh, PA	Pittsburgh, PA	1	--	--	--
Dec 16	3:12 PM	724.719.7248	Pittsburgh, PA	Wexford, PA	1	--	--	--
Dec 17	12:37 PM	412.822.0352	Pittsburgh, PA	Pittsburgh, PA	1	--	--	--
Dec 17	3:03 PM	412.403.0551	Pittsburgh, PA	Pittsburgh, PA	14	--	--	--
Dec 17	3:49 PM	412.403.0551	Pittsburgh, PA	Pittsburgh, PA	3	--	--	--
Dec 17	6:10 PM	412.377.0169	Pittsburgh, PA	Pittsburgh, PA	15	--	--	--
Dec 17	7:25 PM	267.625.4821	Pittsburgh, PA	Jenkintown, PA	2	--	--	--
Dec 17	7:27 PM	412.408.7452	Pittsburgh, PA	Incoming, CL	1	--	--	--
Dec 17	8:47 PM	267.625.4821	Pittsburgh, PA	Incoming, CL	14	--	--	--
Dec 18	12:04 PM	412.369.0700	Oakdale, PA	Incoming, CL	1	--	--	--
Dec 18	12:06 PM	412.401.7869	Oakdale, PA	Incoming, CL	1	--	--	--
Dec 18	4:10 PM	412.255.2423	Pittsburgh, PA	Incoming, CL	1	--	--	--
Dec 18	5:02 PM	412.403.0551	Pittsburgh, PA	VM Deposit, CL	1	--	--	--
Dec 18	6:01 PM	412.403.0551	Pittsburgh, PA	Incoming, CL	30	--	--	--
Dec 18	7:16 PM	412.403.0551	Pittsburgh, PA	VM Deposit, CL	1	--	--	--
Dec 18	7:33 PM	412.403.0551	Pittsburgh, PA	Incoming, CL	5	--	--	--
Dec 18	9:11 PM	412.478.1964	Pittsburgh, PA	Incoming, CL	1	--	--	--
Dec 18	9:28 PM	502.650.7577	Pittsburgh, PA	Incoming, CL	3	--	--	--
Dec 18	10:03 PM	412.478.1964	Pittsburgh, PA	Pittsburgh, PA	3	--	--	--
Dec 19	5:16 PM	412.403.0551	Pittsburgh, PA	Incoming, CL	5	--	--	--
Dec 19	6:31 PM	412.478.1964	Pittsburgh, PA	Pittsburgh, PA	2	--	--	--
Dec 19	6:39 PM	412.478.1964	Pittsburgh, PA	Pittsburgh, PA	1	--	--	--
Dec 19	6:45 PM	412.478.1964	Pittsburgh, PA	Pittsburgh, PA	1	--	--	--
Dec 20	8:57 AM	412.606.2552	Oakdale, PA	Pittsburgh, PA	7	--	--	--
Dec 20	10:54 AM	412.403.0551	Pittsburgh, PA	Pittsburgh, PA	5	--	--	--
Dec 20	11:12 AM	412.478.1964	Pittsburgh, PA	Pittsburgh, PA	3	--	--	--
Dec 20	4:41 PM	412.401.7836	Pittsburgh, PA	Incoming, CL	1	--	--	--
Dec 20	5:24 PM	412.478.1964	Mc Kees Ro, PA	Pittsburgh, PA	2	--	--	--
Dec 20	5:28 PM	412.403.0551	Oakdale, PA	VM Deposit, CL	2	--	--	--
Dec 20	5:29 PM	412.403.0551	Pittsburgh, PA	Incoming, CL	4	--	--	--
Dec 20	5:57 PM	412.403.0551	Pittsburgh, PA	Incoming, CL	16	--	--	--

← PWSA rep called to confirm 12/19 shut-off

Attachment I
I

From: Danielle Smith <danielle@pvstitle.com>
To: charita7@aol.com <charita7@aol.com>
Subject: RE: Estate of Charles Bush- Seller
Date: Tue, Nov 5, 2019 10:11 am

Hi Charita,

PWSA did deposit the check for \$762.88 from us. It cleared our account on 09/28/2019.

Thanks!

****In an effort to improve communications, we have implemented a new email. Please use status@pvstitle.com for all correspondences going forward, so that the first available team member can assist you.****

Enjoy the day,

Danielle Smith

PV Settlement LLC

300 Fleet Street – Suite 105

Pittsburgh, PA 15220

Main: 412-593-4800 Ext 2307

Efax: 412-745-4800

danielle@pvstitle.com

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Jordan Tax Service, Inc.

102 Rahway Road • McMurray, PA 15317-3349

(412) 835-5243 • Fax (412) 835-5244

(724) 731-2300 • Fax (724) 731-2398

www.jordantax.com

Tax & Record
Services

Municipal

Business

Individual

Attachment J

RECEIPT

J

We hereby acknowledge receipt of

CASH

CHECK # _____

In the amount of \$ 1252.57 this 31st day of December, 2018

Muni Code: PI

Block/Lot # 22-J-342

Name: Bush / Williams

Received By: K-F

PAID
DEC 31 2018

JORDAN TAX SERVICE

NOTICE: TAXES WILL NOT BE SATISFIED UNTIL PAID IN FULL AND ONLY IF CHECK HAS CLEARED.

Balance: \$ 4,274.59

Attachment K

A. U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT FINAL SETTLEMENT STATEMENT	B. TYPE OF LOAN 1. <input type="checkbox"/> FHA 2. <input type="checkbox"/> FmHA 3. <input checked="" type="checkbox"/> Conv. Unins. 4. <input type="checkbox"/> VA 5. <input type="checkbox"/> Conv. Ins.				
	6. FILE NUMBER: PV-190932		7. LOAN NUMBER:		
	8. MORTGAGE INS CASE NUMBER:				

C. NOTE: This form is furnished to give you a statement of actual settlement costs. Amounts paid to and by the settlement agent are shown. Items marked "[POC]" were paid outside the closing; they are shown here for informational purposes and are not included in the totals. 1.0 3/98 (PV-190932 / 67)

D. NAME AND ADDRESS OF BORROWER: Bridgehouse Properties, LLC 439 Monmouth Drive Cranberry Twp, PA 16066	E. NAME AND ADDRESS OF SELLER: The Estate of Charles Bush, deceased 1339 Adams Street Pittsburgh, PA 15233	F. NAME AND ADDRESS OF LENDER: House Flip Solo 401K Trust, Thomas C. Barrage, Trustee 323 Berkshire Drive Cranberry Twp, PA 16066
G. PROPERTY LOCATION: 1448 N Franklin Street Pittsburgh, PA 15233 Allegheny County, Pennsylvania	H. SETTLEMENT AGENT: PV Settlement LLC PLACE OF SETTLEMENT: 300 Fleet Street Suite 105 Pittsburgh, PA 15220	I. SETTLEMENT DATE: September 18, 2019 DISBURSEMENT DATE: September 18, 2019

J. SUMMARY OF BORROWER'S TRANSACTION	
100. GROSS AMOUNT DUE FROM BORROWER:	
101. Contract sales price	10,000.00
102. Personal property	
103. Settlement charges to borrower (line 1400)	1,132.50
104.	
105.	
<i>Adjustments for items paid by seller in advance</i>	
106. City/Town taxes 09/19/19 to 12/31/19	104.39
107. County taxes 09/19/19 to 12/31/19	59.42
108. School Taxes 09/19/19 to 12/31/19	123.61
109.	
110.	
111.	
112.	
120. GROSS AMOUNT DUE FROM BORROWER	11,419.92
200. AMOUNTS PAID BY OR IN BEHALF OF BORROWER:	
201. Deposit or earnest money	10.00
202. Principal amount of new loan(s)	16,000.00
203. Existing loan(s) taken subject to	
204.	
205.	
206.	
207.	
208.	
209.	
<i>Adjustments for items unpaid by seller</i>	
210. City/Town taxes	
211. County taxes	
212. Assessments	
213.	
214.	
215.	
216.	
217.	
218.	
219.	
220. TOTAL PAID BY/FOR BORROWER	16,010.00
300. CASH AT SETTLEMENT FROM/TO BORROWER:	
301. Gross amount due from Borrower (Line 120)	11,419.92
302. Less amount paid by/for Borrower (Line 220)	(16,010.00)
303. CASH TO BORROWER	4,590.08

K. SUMMARY OF SELLER'S TRANSACTION	
400. GROSS AMOUNT DUE TO SELLER:	
401. Contract sales price	10,000.00
402. Personal property	
403.	
404.	
405.	
<i>Adjustments for items paid by seller in advance</i>	
406. City/Town taxes 09/19/19 to 12/31/19	104.39
407. County taxes 09/19/19 to 12/31/19	59.42
408. School Taxes 09/19/19 to 12/31/19	123.61
409.	
410.	
411.	
412.	
420. GROSS AMOUNT DUE TO SELLER	10,287.42
500. REDUCTIONS IN AMOUNT DUE TO SELLER:	
501. Excess deposit (see instructions)	
502. Settlement charges to seller (line 1400)	985.00
503. Existing loan(s) taken subject to	
504. Payoff of first mortgage loan	
505. Payoff of second mortgage loan	
506. Dep. retained by seller	10.00
507.	
508.	
509. Inheritance Tax Escrow	2,000.00
<i>Adjustments for items unpaid by seller</i>	
510. City/Town taxes	
511. County taxes	
512. Assessments	
513. Judgment Payoff	784.75
514. Delinquent County Tax	22-J-342 488.12
515. Delinquent School Tax	22-J-342 827.13
516. Delinquent City Tax	22-J-342 763.81
517. 2019 City/School/Library Tax	22-J-342 822.20
518. 2019 County Tax	22-J-342 235.69
519. Final Water/Sewer	5064687-1033546 762.88
520. TOTAL REDUCTION AMOUNT DUE SELLER	7,679.58
600. CASH AT SETTLEMENT TO/FROM SELLER:	
601. Gross amount due to Seller (Line 420)	10,287.42
602. Less reductions due Seller (Line 520)	(7,679.58)
603. CASH TO SELLER	2,607.84

The undersigned hereby acknowledge receipt of a completed copy of pages 1&2 of this statement & any attachments referred to herein.

Borrower
 Bridgehouse Properties, LLC

Seller
 The Estate of Charles Bush, deceased

BY: _____
 Mark T. Restelli
 Member

BY: _____
 Charita Bush
 Executrix

11/12/2019

Fwd: HOT MANCHESTER MUST SEE

Attachment L

From: Renee Bush <rdbush333@gmail.com>
To: charita7 <charita7@aol.com>
Subject: Fwd: HOT MANCHESTER MUST SEE
Date: Thu, Nov 7, 2019 8:49 pm

----- Forwarded message -----

From: Jamar White <jwhite@urtaxsolutions.com>
Date: Thu, Nov 7, 2019, 7:46 PM
Subject: Fwd: HOT MANCHESTER MUST SEE
To: Renee Bush <RDBUSH333@gmail.com>

----- Forwarded message -----

From: PACHB HOT MANCHESTER DEAL <mark@pachbproperties.com>
Date: Wed, Oct 23, 2019 at 10:04 AM
Subject: HOT MANCHESTER MUST SEE
To: <jwhite@urtaxsolutions.com>



HOT HOT HOT

1448 N. Franklin St., Pittsburgh 15233 (Manchester)

3 BR / 1 BTH

\$58,900

PRICE REDUCTION



FINALLY!! A Clean Renovation Project!

Cleaned out and ready to finish!

Hot Hot Manchester Area 21st Ward

Easy 4 Week project with Big Profits.

ARV \$130,000 Plus!

The Details

Looking for a straightforward project without all the old house issues? This is perfect for you!! 90% interior work. The neighbor's house just finished and sold in 7 days!!

- **3 Bedroom, 1 Bath Townhouse/Row House**
- **1970 Built Masonry Row House**
- **Cleaned out and ready to finish!**
- **Windows - good**
- **Roof - Shingled needs to be replaced**
- **Furnace - newer good condition**
- **Plumbing - some repair needed**
- **Electrical - 100 Amp Breaker Box Good Condition**
- **Large Dry Basement**
- **Living Area - 1,134 sqft**
- **Lot Size - 2,728 sqft**
- **Estimated Yearly estimated Taxes \$2,240**
- **Rental income - estimated \$950- \$1,100**

Access: Lock Box

PHOTO PACKAGE

Call or text

Mark Restelli
(412)977-6800

Mark@PACHBproperties.com