

**Sonceiray Bowman(Customer)**

**6734 N. Broad Street**

**Philadelphia, PA, 19126**

**Angela Bowman (Agent)**

**267-597-8047**

**Angelabowman000@gmail.com**

**March 8, 2024**

**Public Utility Commission**

**400 North Street**

**Harrisburg, PA 17120**

**Graciela Christlieb Esquire (PGW)**

**800 W. Montgomery Avenue**

**Philadelphia, PA 19122**

**In the Matter of: C-2023-3041967**

### **MOTION FOR SANCTIONS AND TO ADDRESS ATTORNEY MISCONDUCT**

Now comes Angela Bowman, in the capacity of Durable Power of Attorney for Sonceiray Bowman, and hereby submits this Motion for Sanctions and to Address Attorney Misconduct, and in support thereof states as follows:

#### **INTRODUCTION**

1. I, Angela Bowman, I am the duly appointed and acting Durable Power of Attorney for Bowman, as evidenced by the Durable Power of Attorney Document dated December 8, 2023.

A). I believe I deserve respect and all constitutional rights should be reserved. In any capacity, I stand my position with the Philadelphia Gas Works. The lack of respect and due diligence is lacking on PGW's part with their representative. As a criminal justice and psychology professional, the bias and the disregard is clear in my professional opinion. Her

screaming at me made that clear due to me objecting her claims. Though we were turned down by Community Legal, Vic Patel, stating that he didn't have time for the case and to just pay the excessive payment arrangement amount, though I dispute it. It is in hopes we acquire an attorney to fully be able to plead out case effectively. The attorney at question is violating the rights of the Durable Attorney Power of Attorney by, using me as a witness and not as a Agent.

B). The occurrence is isolated. With the previous attorney, Anita Murray, things always stayed professional in previous hearings.

C). It was bought up by Graciela Christlieb Esquire that Sonceiray Bowman may have other outstanding bills in which she does not. Sonceiray Bowman does not even have a credit profile due to none use, e.g., no credit cards or other outstanding bills in her entire life.

D). Graciela Christlieb Esquire suggested that my legal documents may not be real without knowledge of them not being authentic.

F. This was a defamation case against myself, Angela Bowman in my opinion. Graciela tried to use most of the court's time to repeatedly insult and defame me in a sarcastic, discriminating, and condescending manner throughout the hearing.

G. Graciela Christlieb Esquire is not trying to investigate why the gas bill is almost at \$30,000 and has misplaced payments on the account which is impeding on the rights of Sonceiray Bowman.

## **BACKGROUND**

2. November 29, 2023, I Angela Bowman was required by the courts to make an amended motion on behalf of Sonceiray Bowman as the Agent. To my understanding a motion should be responded to within ten days.

3. Christlieb Esquire, failed to comply with the aforementioned deadline, thereby disregarding the court's order and impeding the legal rights of Sonceiray Bowman, whom I represent as the agent under the Durable Power of Attorney. Stating she did not believe she should answer the motion due to my status of the court(durable power of attorney). It was blatant disrespect. As for not responding in a timely manner, the attorney committed silent acquiescence. Her reasoning was that "she felt she didn't have to".

4. Subsequent to the failure to comply, an extension was granted, which I submit is prejudicial to the rights of Sonceiray Bowman and not in the interests of justice.

## **ARGUMENT**

5. The failure of Graciela Christlieb Esquire to adhere to the original court-ordered deadline constitutes a disregard for the legal process and potentially prejudices the rights of Sonceiray Bowman and in fact questions her motives.

6. As the agent under the Durable Power of Attorney, I have the authority and responsibility to act in the best interests of Sonceiray Bowman and to protect her legal rights as per State's Durable Power of Attorney Act or equivalent statute.

7. The inaction and misconduct of Graciela Christlieb Esquire, infringed upon the rights of Sonceiray Bowman and may violate State's Rules of Professional Conduct or equivalent ethical guidelines for attorneys. She is too personally involved, evident with her outburst at me as a professional today at the hearing with PUC, on March 7, 2024. Graciela Christlieb Esquire, did not stay professional and began hollering. She questioned the same competence that she did not have.

### **RELIEF SOUGHT**

8. Therefore, I respectfully request the following relief:

a. The court impose appropriate sanctions upon Graciela Christlieb Esquire for her failure to comply with court orders and deadlines, and for her unethical conduct that has impeded the rights of Sonceiray Bowman.

b. The court grant such other and further relief as it deems just and proper to protect the legal rights of Sonceiray Bowman and to ensure the integrity of these proceedings.

c. The court conduct an inquiry into the circumstances of Graciela Christlieb Esquire's assumption of this case and, based on its findings, take appropriate actions including, but not limited to, disqualification of Graciela Christlieb Esquire from representing the opposing party in this matter.

9. The actions of Graciela Christlieb Esquire have not only delayed the proceedings but also compromised the legal rights and interests of Sonceiray Bowman as such, it is imperative that the court address this misconduct to prevent further prejudice and to prevent further prejudice and to uphold the principles of justice and fair play which are foundational to our legal system.

10. In addition to the aforementioned issues, there are serious concerns regarding Graciela Christlieb Esquire taking over representation in this matter. It has come to my attention that Graciela Christlieb Esquire has assumed responsibility for this case due to her purported personal knowledge and prior interactions related to prior cases.

11. The transition of legal representation to Graciela Christlieb Esquire raises potential conflicts of interest and ethical considerations that may affect the fairness and impartiality of the legal proceedings. Such actions may contravene the ethical obligations outlined in [State Bar Association's Rules of Professional Conduct or equivalent ethical rules], which require attorneys to maintain professional independence and avoid conflicts of interest that could impair their ability to represent their clients effectively and impartially. Graciela Christlieb Esquire, has stated that she took the case from another lawyer, Anita Murray, because she felt as though she was familiar due to a previous case. I am declaring there are missing payments and Graciela Christlieb Esquire testified about money she and I know about but is not documented on the evidence Exhibit that had been provided from

PGW. She also had preconceived notions without proof that led to what I feel is discrimination for myself and Sonceiray Bowman.

12. The involvement of Graciela Christlieb Esquire based on personal knowledge or prior interactions may create an unfair advantage, compromise the confidentiality of the case, or otherwise influence the proceedings in a manner that undermines the rights and interests of Sonceiray Bowman by citing an old case repeatedly.

13. Given these concerns, I request that the court closely scrutinize the circumstances under which Graciela Christlieb Esquire has taken over this case and, if deemed appropriate, disqualify her from further participation in this matter to protect the integrity of the proceedings and the interests of Sonceiray Bowman, as the court.

**RELIEF SOUGHT (continued)**

14. This Court should be made aware of a troubling issue concerning electronic communication with Graciela Christlieb Esquire. On March 1, 2024, attempts were made to send a copy of a motion to Graciela Christlieb Esquire [Graciela.christlieb@pgw.com](mailto:Graciela.christlieb@pgw.com). These attempts were met with a address not found message. Graciela Christlieb Esquire and I had previous dealings with another case. Her email was already saved from Google. I believe I was blocked from previous correspondences and was never unblocked for the abrupt takeover of the new case to correspond.

15. Given the critical nature and timing of the intended communication, this failure raises concerns about potential deliberate obstruction or, at the very least, technical deficiencies that need to be addressed to ensure reliable and consistent communication between parties as required for the proper conduct of these proceedings.

16. The inability to communicate electronically is particularly suspicious under the present circumstances, where timely and effective communication is essential for the administration of justice and the protection of Sonceiray Bowman's legal rights.

17. It is imperative for the Court to acknowledge this impediment and to take appropriate measures to ensure that all parties have equal access to a fair and efficient process of communication. The integrity of the legal process is underpinned by the assurance that all parties can convey and receive information without undue interference or technical complications that may prejudice the rights of any party involved.

**RELIEF SOUGHT (continued)**

18. I ask the court to take any action deemed necessary to ensure that communication between the parties is unimpeded, so as to prevent any party from gaining an unfair advantage or from being prejudiced by the lack of effective communication.

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RESPECTFULLY SUBMITTED,

*Angela Bowman*

\*Angela Bowman, Agent under Durable Power of Attorney for Sonceiray Bowman

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion for Sanctions and to Address Attorney Misconduct has been furnished by US certified mail and email, to all parties of record on this March 9, 2024

*Angela Bowman*

Angela Bowman