

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Shasta Patrice Brown,
Complainant

v.

Philadelphia Gas Works,
Respondent

Docket No: C-2024-3050761

MOTION FOR ISSUANCE OF SUBPOENA DUCES TECUM

Pursuant to 52 Pa. Code § 5.421(a), Complainant Shasta Patrice Brown respectfully requests that the Honorable Administrative Law Judge issue a Subpoena Duces Tecum directed to the legal department and/or custodian of records for Philadelphia Gas Works, requiring the production of specific documents as described herein.

This request is made in good faith and is reasonably calculated to lead to the discovery of admissible evidence in support of claims including, but not limited to, unjust enrichment, fiduciary breach, fraud in factum, material misrepresentation, and improper double-entry accounting involving Complainant's utility service account.

I. REQUESTED DOCUMENTS

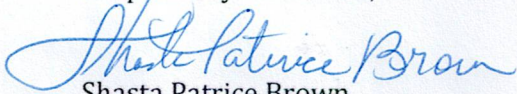
1. Original Service Application submitted by or associated with the Complainant, including all executed pages, internal annotations, and underwriting determinations.
2. Complete accounting ledger history for account number(s) associated with Complainant, including both sides of the ledger under GAAP and FERC reporting.
3. Internal documents and correspondence regarding the securitization or monetization of the Complainant's service account as a revenue asset or financial instrument.
4. Copies of any and all IRS, SEC, or Treasury forms referencing Complainant's name, service address, account number, or social security number (including Forms 56, 1099, 8300, 233, 231, etc.).
5. Internal policies and procedures on the treatment of deferred revenue, credit accounting, and customer investment classification.
6. Any internal legal communications or memoranda referring to Complainant's filings, claims, or notices asserting investor, creditor, or non-taxpayer status.
7. All billing statements and reconciliation documents from the inception of the account to present.

8. Any filings with third-party entities identifying the Complainant's account as an asset, revenue stream, or subject of securitization.

II. JUSTIFICATION

These documents are directly relevant to proving that Philadelphia Gas Works has unjustly enriched itself through misapplication of credits, improper accounting practices, and by refusing to acknowledge the Complainant's status as an investor/creditor under applicable trust and securities law. The information sought is not available through public channels and is material to the resolution of the issues raised in this complaint.

Respectfully submitted,



Shasta Patrice Brown

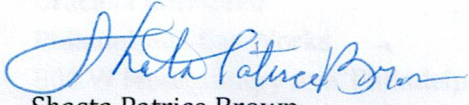
5233 Heston Street

Philadelphia, PA 19131

Dated: 14 May 25

VERIFICATION SERVICE

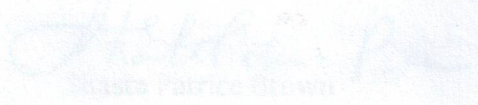
I, Shasta Patrice Brown, hereby state that the facts set forth in the foregoing Motion for Issuance of Subpoena Duces Tecum are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Shasta Patrice Brown

Dated: 14 May 25

Dated: _____



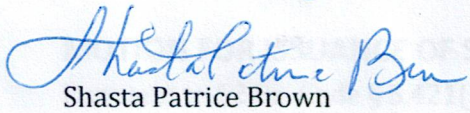
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Motion for Issuance of Subpoena Duces Tecum upon the following persons in accordance with the requirements of 52 Pa. Code § 1.54:

Shasta Patrice Brown,

Graciela Christlieb
Philadelphia Gas Works
800 W Montgomery Ave, Philadelphia, PA 19122
graciela.christlieb@pgworks.com

Dated: 14 May 25


Shasta Patrice Brown

IN RE: SUBPOENA DUCES TECUM
(4). Complainant Shasta Patrice Brown respectfully requests that the Honorable Administrative Law Judge issue a Subpoena Duces Tecum directed to the legal department and/or custodian of records for Philadelphia Gas Works, requiring the production of specific documents as described herein.

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