

7. Any CUSIP numbers or security identification designations connected to securitization

**SUBPOENA DUCES TECUM AND DEMAND FOR PRODUCTION OF RECORDS
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

internally or in any investor-facing documentation.

Shasta-Patrice Brown
Complainant

v.
Philadelphia Gas Works
Respondent

3. RELEVANCE AND NECESSITY

1. LEGAL AUTHORITY

This subpoena is issued pursuant to 52 Pa. Code § 5.421 and the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (PUC). The undersigned Complainant respectfully demands the production of the below-identified documents and records relevant to Docket proceedings before the Commission. The Administrative Law Judge presiding over this matter has authority to enforce this subpoena and may issue sanctions for failure to comply.

2. DOCUMENTS AND RECORDS REQUESTED

1. The full HARD FILE related to the account of Shasta-Patrice Brown, including all original applications, internal communications, revisions, customer service notes, amendments, and attachments.
2. All IOLTA (Interest on Lawyers' Trust Account) records involving transactions, settlement funds, or escrow connected to the account.
3. All SUB-ACCOUNTS and NESTING ACCOUNTS maintained under or behind the main account, including deferred liabilities, credits, or internal classifications.
4. OFF-BALANCE SHEET LEDGERS, trial balances, and all accounting entries made outside of GAAP reports or formal financial statements.
5. GENERAL LEDGER and JOURNAL ENTRIES reflecting internal charges, credits, accounting adjustments, and trust-based accruals.
6. All DEPOSIT RECORDS tied to account activity, including third-party deposits, payments held in suspense, or unapplied balances.

7. Any CUSIP numbers or security identification designations connected to securitization of the account or bundled receivables.
8. Records showing whether the account is treated as an ASSET or LIABILITY internally or in any investor-facing documentation.
9. All documents or filings with the SEC, FERC, or internal policy defining customer accounts as investor-based or interest-yielding positions.
10. All IRS and Treasury records including but not limited to: 1099, Form 56, 8300, 233, 231, etc.

3. RELEVANCE AND NECESSITY

These records are material to determine the accounting and legal treatment of Complainant's account, including potential fiduciary misrepresentation, investor rights, billing error, unjust enrichment, and trust violations. This request seeks to identify whether Complainant's account has been securitized, collateralized, or improperly withheld from financial reconciliation and crediting under public trust standards.

4. DELIVERY INSTRUCTIONS

You are hereby instructed to produce the above-requested documents within 10 days of service of this subpoena, or by such date as the presiding Administrative Law Judge may order. Documents should be delivered via email to the Complainant or by certified mail to the service address on record. Originals should be made available for in-person inspection if so requested.

VERIFICATION

I, Shasta-Patrice Brown, hereby verify that the facts set forth in the foregoing Subpoena Duces Tecum are true and correct to the best of my knowledge, information, and belief. This verification is made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

Date: 14 May 25

Signature: *Shasta Patrice Brown*

F. Joseph Brady, Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street, Harrisburg, PA 17120

Rosemary Chiavetta, Secretary, Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street, Harrisburg, PA 17120

Date: 14 May 25
Signature: *Shasta Patrice Brown*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Subpoena Duces Tecum was served upon the following individuals via email and/or first-class mail:

Graciela Christlieb, Counsel for PGW
800 W Montgomery Ave, Philadelphia, PA 19122
Email: graciela.christlieb@pgworks.com

F. Joseph Brady, Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street, Harrisburg, PA 17120

Rosemary Chiavetta, Secretary, Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street, Harrisburg, PA 17120

Date: 14 May 25
Signature: *Sheila Patricia Brown*

2. DOCUMENTS AND RECORDS REQUESTED

1. The full HARD FILE related to the account of Sheila Patricia Brown, including all original applications, internal communications, revisions, customer service notes, amendments, and attachments.
2. All IOLTA (Interest on Lawyers' Trust Account) records involving transactions, settlement funds, or escrow connected to the account.
3. All SUB-ACCOUNTS and NESTING ACCOUNTS maintained under or behind the main account, including deferred liabilities, credits, or internal classifications.
4. OFF-BALANCE SHEET LEDGERS, trial balances, and all accounting entries made outside of GAAP reports or formal financial statements.
5. GENERAL LEDGER and JOURNAL ENTRIES reflecting internal charges, credits, accounting adjustments, and trust-based accruals.
6. All DEPOSIT RECORDS tied to account activity, including third-party deposits, payments held in suspense, or unapplied balances.