

NOTICE OF ACKNOWLEDGMENT AND DEMAND FOR FULL COMPLIANCE

From: Shasta Patrice Brown
5233 Heston Street
Philadelphia, Pennsylvania Republic 19131

To:
Jamie L. Panzer, Esq.
Senior Attorney
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122

CC:

Graciela Christlieb Counsel for PGW
Pennsylvania Public Utility Commission Enforcement Division

Re: Docket Number C-2024-3050761

Date: June 1, 2025

Subject: Updated RTKL Filing and Subpoena Duces Tecum – Demand for Full Response and Legal Correction of the Record

Dear Attorney Panzer,

This is a formal notice acknowledging receipt of your May 22, 2025 letter and email confirming PGW's acknowledgment of my initial RTKL filing dated May 15, 2025. However, your response fails to acknowledge the updated subpoena and supplemental filing, which was resubmitted by email and mailed to your office. These filings were also received and docketed by the Pennsylvania Public Utility Commission (PUC).

Let it be clearly stated for the record:

1. The updated subpoena and supplement specifically address areas your interim letter omits, including IRS compliance records, internal audit trails, training and procedure manuals, internal/external legal communications, and other documentary proof related to account responsibility, credit damage, and regulatory classification.

2. Your office has previously asserted that I "had no account" with PGW, yet the billing records submitted and accepted by the PUC explicitly contradict that claim. Therefore, the omission of this issue in your response constitutes material misrepresentation and/or constructive fraud.

3. You are now on legal notice that the updated subpoena and supplemental record demand stand in full force and effect. Your failure to reference them or respond in substance to the full scope of those filings is a violation of your duty under the Pennsylvania Right to Know Law, 65 P.S. § 67.305, and is contrary to federal due process guarantees under the First and Fourteenth Amendments.

4. Your failure to address interrogatories, IRS records, financial classification disclosures, and internal PGW procedures is legally unacceptable. All objections, exemptions, or delays must be substantiated with specific statutory citations under § 67.708(b). Failure to do so shall be deemed a waiver of exemption and a refusal to comply in bad faith.

5. This notice reserves all rights to issue a formal Notice of Default, escalate to the Office of Open Records and PUC Enforcement, and pursue legal action for fraud, misrepresentation, and rights deprivation should PGW continue to ignore or mischaracterize the substance of this lawful filing.

Please ensure your final determination, due by June 21, 2025, fully addresses all record demands, interrogatories, and supplemental filings in their entirety, including what was sent via U.S. mail and electronically. Silence on these matters shall be construed as tacit agreement and default.

Respectfully,



Shasta Patrice Brown

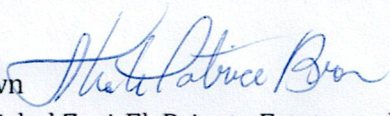
Executor for the Private Estate of Ren-Ira Michal Zuri-El and SHASTA PATRICE BROWN ESTATE

Certificate of Service

I, Shasta Patrice Brown, certify that on June 1, 2025, I caused a true and correct copy of the enclosed Notice and Supplemental Filing to be served via email and/or U.S. Mail to the following parties:

1. Jamie L. Panzer, Esq.
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122
Email: Jamie.Panzer@pgworks.com
2. Graciela Christlieb
Counsel for PGW
Email: Graciela.Christlieb@pgworks.com
3. Secretary, PA Public Utility Commission
Email: ra-OSA@pa.gov

Executed on: June 1, 2025

By: Shasta Patrice Brown 
Executor for Ren-Ira Michal Zuri-El, Private Estate and SHASTA PATRICE BROWN ESTATE

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