
Hayley E. Wilburn

hwilburn@postschell.com
412-506-6362 Direct
412-227-9065 Direct Fax
File #: 213306

July 3, 2025

VIA ELECTRONIC FILING

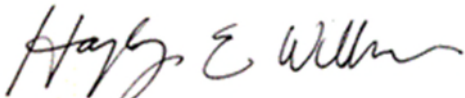
Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Robert T. Green, Sr., v. Peoples Natural Gas Company LLC
Docket No. C-2025-3055736**

Dear Secretary Homsher:

Attached for filing are the Preliminary Objections of Peoples Natural Gas Company LLC to the Complaint of Robert T. Green, Sr., in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Hayley E. Wilburn

HW/dmc
Attachment

cc: Certificate of Service

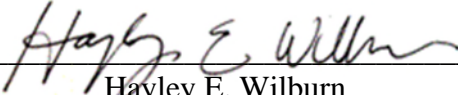
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA EMAIL

Robert T. Green, Sr.
greenholding@hotmail.com

Date: July 3, 2025



Hayley E. Wilburn

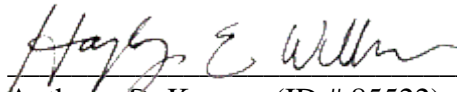
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Robert T. Green, Sr.,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3055736
	:	
Peoples Natural Gas Company LLC,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.101, YOU MAY FILE AN ANSWER TO THE ENCLOSED PRELIMINARY OBJECTIONS WITHIN TEN (10) DAYS OF THE DATE OF SERVICE HEREOF. YOUR ANSWER TO THE PRELIMINARY OBJECTIONS MUST BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL FOR PEOPLES NATURAL GAS COMPANY LLC.

Meagan Moore (ID # 317975)
Jennifer Petrisek (ID # 83411)
Peoples Natural Gas
375 North Shore Drive
Pittsburgh, PA 15212
Phone: 412-208-6527
412-208-6834
E-mail: Meagan.Moore@peoples-gas.com
Jennifer.Petrisek@peoples-gas.com


Anthony D. Kanagy (ID # 85522)
Hayley E. Wilburn (ID # 336055)
Post & Schell, P.C.
17 North 2nd St., 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-612-6034
Fax: 717-731-1985
E-mail: akanagy@postschell.com
hwilburn@postschell.com

Dated: July 3, 2025

Attorneys for Peoples Natural Gas Company
LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Robert T. Green, Sr.,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3055736
	:	
Peoples Natural Gas Company LLC,	:	
	:	
Respondent.	:	

**PRELIMINARY OBJECTIONS OF PEOPLES NATURAL
GAS COMPANY LLC TO THE COMPLAINT OF
ROBERT T. GREEN, SR.**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes Peoples Natural Gas Company LLC (“Peoples” or the “Company”) and hereby files these Preliminary Objections, pursuant to the regulations of the Pennsylvania Public Utility Commission (“Commission”) at 52 Pa. Code § 5.101, and respectfully requests that the Commission dismiss the above-captioned Formal Complaint (“Complaint”) filed by Robert T. Green, Sr. (“Complainant”) in its entirety or, alternatively, dismiss portions of the Complaint, with prejudice as against Peoples.

In support thereof, Peoples states as follows:

I. BACKGROUND

1. Peoples is a “public utility” and a “natural gas distribution company” as those terms are defined under the Public Utility Code, 66 Pa. C.S. §§ 102 and 2202, subject to the regulatory jurisdiction of the Commission.

2. Peoples provides natural gas service to approximately 700,000 customers throughout its service territory which includes a large portion of Western Pennsylvania.

3. On June 23, 2025, Peoples was served with the above-captioned Complaint.

4. It appears to Peoples that the Complainant is bringing this action on behalf of two corporate entities, specifically Mifflin Energy Resources and Emerald Energy Services (the “LLCs”).

5. The Complainant names Equitrans Midstream Corporation (“Equitrans”), EQT Corporation (“EQT”), and the Commission alongside Peoples in the Complaint. (Complaint ¶ 2.)

6. Throughout the Complaint, the Complainant makes no averments to gas service provided at his address. Moreover, the Complainant’s name is not listed on the account at his service address. Peoples has no record of disputes on that account, nor are there apparent issues.

7. The Complainant made several general averments in the Complaint regarding gas quality, pipeline abandonment, unmaintained or fraudulent farm taps, and mishandling of cases before the Commission. (*See* Complaint ¶ 4 and ¶ 5.)

8. The Complainant also avers a federal antitrust violation. Specifically, the Complainant avers that the Company engaged in gathering line abandonment for the purpose of cutting off small producers in order to create a monopoly for large producers, that the Company used the Commission to facilitate these actions, and this constitutes a federal antitrust violation. (Complaint ¶ 4, Attachment, p. 6.)

9. The Complainant's request for relief includes one request, and several other averments. The request is for the Commission to reopen an investigation which the Company was not a party to. The averments include a defrauding of taxpayers, apparently by state agencies, and the deliberate division of a company in order to dump bad assets into one division of the company. (Complaint ¶ 5.)

II. STANDARD OF REVIEW

10. Pursuant to the Commission's regulations, preliminary objections in response to a pleading may be filed on several grounds, including:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.
- (3) Insufficient specificity of a pleading.
- (4) Legal insufficiency of a pleading.
- (5) Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.
- (6) Pendency of a prior proceeding or agreement for alternative dispute resolution.
- (7) Standing of a party to participate in the proceeding.

52 Pa. Code § 5.101(a) (emphasis added).

11. In ruling on preliminary objections, the Presiding Officer must accept as true all well-pled allegations of material facts as well as all inferences reasonably deducible therefrom. *Stilp v. Cmwlt.*, 910 A.2d 775, 781 (Pa. Cmwlt. 2006) (citing *Dep't of Gen. Servs. v. Bd. of Claims*, 881 A.2d 14 (Pa. Cmwlt. 2005)). However, the Presiding Officer need not accept as true conclusions of law, unwarranted inferences from facts, argumentative allegations, or expressions of opinion. *Stanton-Negley Drug Co. v. Dep't of Pub. Welfare*, 927 A.2d 671, 673 (Pa. Cmwlt.

2007). Notwithstanding, any doubt must be resolved in favor of the non-moving party. *Stilp*, at 781.

12. In addition, the Presiding Officer must determine whether, based on the factual pleadings, if recovery is possible. *See Rok v. Flaherty*, 527 A.2d 211, 214 (Pa. Cmwlth. 1987). Indeed, for preliminary objections to be sustained, it must appear with certainty that the law will permit no recovery. *See Stilp*, at 781; *Milliner v. Enck*, 709 A.2d 417, 418 (Pa. Super. 1998).

III. PRELIMINARY OBJECTIONS

A. PRELIMINARY OBJECTION NO. 1 – THE COMMISSION LACKS SUBJECT MATTER JURISDICTION OVER MATTERS ARISING UNDER FEDERAL ANTITRUST LAWS

13. Peoples incorporates by reference Paragraphs 1 through 12 as if fully set forth herein.

14. The Complaint should be dismissed because the Commission lacks subject matter jurisdiction to decide matters arising under federal antitrust laws.

15. The Complainant avers that Peoples has committed a federal antitrust violation by allegedly abandoning gathering lines “to cut off production from small producers to create a monopoly for large producers,” and the Company has used the Commission to facilitate such actions. (Complaint ¶ 4, Attachment, p. 6.)

16. The Complainant does not allege that the Company engaged in such actions in violation of the Public Utility Code, the Commission’s regulations or orders, or the Company’s Commission-approved tariff.

17. As a creature of statute, the Commission “has only those powers which are expressly conferred upon it by the Legislature and those powers which arise by necessary implication.” *Feingold v. Bell*, 383 A.2d 791, 794 (Pa. 1977) (citations omitted).

18. The Commission must act within its jurisdiction and may only hear complaints regarding the Public Utility Code, Commission regulations, or Commission orders. *See Alkhatib v. PECO Energy Co.*, Docket No. C-2011-2242125, 2012 Pa. PUC LEXIS, at *13-14 (Jan. 12, 2012) *citing* 66 Pa. C.S. § 701.

19. Therefore, the Commission lacks subject matter jurisdiction over the Complainant's allegations that are rooted in federal antitrust law.

20. Thus, the Commission should dismiss the portion of the Complaint alleging violations of federal antitrust laws, pursuant to Section 5.101(a)(1) of the Commission's regulations because the Commission lacks subject matter jurisdiction over those claims. 52 Pa. Code § 5.101(a)(1).

B. PRELIMINARY OBJECTION NO. 2 – THE COMPLAINT FAILS TO PROVIDE REASONABLE OR ADEQUATE SPECIFICITY

21. Peoples incorporates by reference Paragraphs 1 through 20 as though fully set forth herein.

22. Paragraph No. 4, Items No. 2, No. 3, and No. 7 of the Complaint allege “[t]he sale of natural gas to residencial [sic] consumers directly out of gathering and transmission lines” who “are not farm tap holders under a writen [sic] lease,” the sale of natural gas to consumers that does “not meet the quality tariff set by the public utilities commission,” and false classification of residential service lines as farm taps. The Complainant also avers that, with respect to Items No. 2 and No. 3, these occurrences were “[w]itnessed by I&E on field inspection.”

23. The Complainant has not identified which named party he seeks to make the claim about, nor has the Complainant furnished adequate detail regarding the Commission's

Bureau of Investigation and Enforcement (“I&E”) field inspection during which the events were allegedly witnessed.

24. The Complainant also avers, in Paragraph 4, Item No. 6, “[d]eliberate gathering line abandonment to cut off production from small producers to create a monopoly for large producers,” and the use of the Commission to facilitate such actions.

25. Additionally, the Complainant avers that residential gas consumers are losing access to natural gas due to mismanagement of utilities. (Complaint ¶ 4, Attachment, p. 8.)

26. Where a Complaint does not contain information specific enough to allow the Respondent to understand the allegations against it in order to form a coherent response, the Complaint should be dismissed for insufficient specificity. *Ross E. Schell v. Suez Water Pennsylvania Inc.*, Docket No. C-2016-2566398, 2017 Pa. PUC LEXIS 20, at *7-8 (Aug. 3, 2017) (Order entered Aug. 3, 2017).

27. Given the language of the averments detailed above, and given that the Complainant names not only Peoples, but also Equitrans, EQT, the PPCC (which Peoples understands to refer to the Peoples Producers Cooperative Committee (the “PPC Committee”), PIOGA, and the Commission in the Complaint, it is impossible to discern where an averment concerns Peoples and where it concerns one of the other named parties.

28. In formulating its response, the Company has been forced to make inferences as to the circumstances surrounding each of the Complainant’s averments, and as to which party the averment has been made.

29. Moreover, the Commission may find insufficient specificity where a Complaint fails to properly detail the interest of the Complainant in the subject matter, and where the

Complaint does not provide a clear and concise statement of the relief sought, consistent with 52 Pa. Code § 5.22(a)(4)-(6). *See Ross E. Schell v. Suez Water*, at *8.

30. The Complainant's requested relief refers to a Commission investigation to which the Company was not party, a general defrauding of taxpayers, and "[solutions] that benefit all of the public." (Complaint ¶ 5.) In doing so, however, the Complainant does not detail the Complainant's own interest in the broad subject matter of the Complaint, nor does the Complainant ever provide a clear statement of the relief he is seeking.

31. Therefore, the Complaint lacks sufficient specificity for the Company to properly determine its involvement with the events averred by the Complainant, to determine whether the Company is the subject of such averments, and to determine the Complainant's requested relief.

32. Accordingly, the Commission should dismiss the Complaint pursuant to Section 5.101(a)(3) of the Commission's regulations because the Complaint lacks specificity. 52 Pa. Code § 5.101(a)(3).

C. PRELIMINARY OBJECTION NO. 3 – THE COMPLAINT IS LEGALLY INSUFFICIENT BECAUSE PEOPLES CANNOT BE HELD LIABLE FOR ADHERING TO ITS COMMISSION-APPROVED TARIFF

33. Peoples incorporates by reference Paragraphs 1 through 32 as though fully set forth herein.

34. The Complainant averred in the Complaint that, among other things, the natural gas being sold to residential customers does not meet the standards of the Company's Commission-approved tariff, and that Peoples' management is aware of such an issue. (Complaint ¶ 4, Attachment, p. 3 – p. 5.)

35. As a matter of law, the Complainant must show that the named utility is responsible or accountable for the problem described in the Complaint in order to prevail.

Patterson v. Bell Tel. Co. of Pa., 72 Pa. PUC 196, 1990 Pa. PUC LEXIS 19, at *8 (Order entered Feb. 8, 1990) (citing *Feinstein v. Phila. Suburban Water Co.*, 50 Pa. PUC 300 (1976)).

36. When “the Complaint fails to state a claim against the named respondent upon which the Commission may grant relief,” the Complaint is “insufficient as to substance,” and the “Respondent is entitled to judgment as a matter of law.” *Stabley v. Phila Gas Works*, Docket No. F-2010-2186368, 2010 Pa. PUC LEXIS 231, at *6 (July 29, 2010) (Initial Decision), *adopted without modification*, (Order entered Oct. 1, 2010); *see Coggins v. UGI Cent. Penn Gas Inc.*, Docket No. C-2012-2312796, 2012 Pa. PUC LEXIS 1497 (Sept. 10, 2012) (Initial Decision), *adopted without modification*, (Order entered Nov. 9, 2012).

37. Additionally, it is a well-settled principle that public utility tariffs have the force and effect of law, and are binding on the utility and the customer. *State Farm Fire & Cas. Co. v. PECO*, 54 A.3d 921, 926 (Pa. Super. 2012) (citing *Pennsylvania Elec. Co. v. Pennsylvania Public Util. Comm’n*, 663 A.2d 281 (Pa. Cmwlth. 1995)). *See also, PPL Elec. Utils. Corp. v. City of Lancaster*, 125 A.3d 837, 846 (Pa. Cmwlth. 2015) (citations omitted); *Phila. Suburban Water Co. v. Pa. Puc*, 808 A.2d 1044, 1050 (Pa. Cmwlth. 2002) (citations omitted).

38. Pursuant to Rule 31 in the Company’s Commission-approved tariff, relating to gas quality, the Company has the discretion to determine when nonconforming gas offered by a producer, Customer, and/or its Natural Gas Supplier is acceptable. Rule 31 provides that the gas delivered to the Company must meet the gas quality specifications located in the tariff, “[u]nless otherwise agreed to by the Company,” and it is the “Company’s option [to] refuse to accept delivery” of nonconforming gas. *See Supp. No. 12 to Peoples – Pa. P.U.C. No. 48*, First Revised Page No. 39.

39. Peoples is in conformance with its Commission-approved tariff when it uses its discretion to accept conforming and nonconforming gas alike from entities, and that tariff has the force and effect of law.

40. As such, Peoples is bound by its Commission-approved tariff and cannot be found to have violated its tariff as a result of the averments in this Complaint regarding acceptance of gas at varying qualities.

41. Therefore, the Complainant has failed to state a claim, in part, against Peoples upon which the Commission may grant relief. *See Rok*, 527 A.2d at 214; *Stilp*, 910 A.2d at 781.

42. Accordingly, the Commission should dismiss the portions of the Complaint concerning gas quality pursuant to Section 5.101(a)(4) of the Commission's regulations because those portions of the Complaint are legally insufficient. 52 Pa. Code § 5.101(a)(4).

D. PRELIMINARY OBJECTION NO. 4 – THE COMPLAINT FAILS TO JOIN NECESSARY PARTIES

43. Peoples incorporates by reference Paragraphs 1 through 42 as though fully set forth herein.

44. Under Pennsylvania law, “a necessary party is one whose presence, while not indispensable, is essential if the court is to resolve completely a controversy and to render complete relief.” *Pa. Human Relations Comm’n v. Phila Sch. Dist.*, 651 A.2d 177 (Pa. Cmwlth. 1993) (citation omitted).

45. The Complainant names Equitrans and EQT in his Complaint. (Complaint ¶ 2.) In doing so, the Complainant averred that he spoke with both Equitrans and EQT, documented said communications, and received no answers. (Complaint ¶ 7.)

46. The Complainant also names PIOGA in his Complaint. (Complaint ¶ 4, Attachment, p.4; Complaint ¶ 7.) The Complainant alleged that some unidentified members of

PIOGA knowingly put gas into gathering lines that does not meet the “state quality tariff,” which the Company takes to mean the Company’s Commission-approved tariff. (Complaint ¶ 4, Attachment, p.4.) The Complainant also averred that he spoke with PIOGA, documented said communications, and received no answers. (Complaint ¶ 7.)

47. The Complaint includes several general averments, through which it is impossible to discern whether the Complainant has made the averment about Peoples, Equitrans, EQT, or PIOGA. Such averments include “[t]he scandle [sic] of deliberately [sic] dividing up a company over corporate greed and dumping bad assets into other companies,” “the sale of natural gas to residential [sic] consumers” who are not farm tap holders under a written lease, natural gas being sold that does not meet the “quality tariff[f] set by the public utilities commission,” deliberate gathering line abandonment, and several other general allegations. (Complaint ¶ 4, Attachments, p.2, p.3, and p. 6; Complaint ¶ 5).

48. The Complainant also makes averments which appear to refer to specific events, but where the exact instance the Complainant is referring to is unclear.

49. Here, Equitrans, EQT, and PIOGA or certain members of PIOGA are necessary parties to this proceeding, given that it is impossible to discern which entity each of the Complainant’s averments concern.

50. Additionally, the Complaint contains specific averments to which Peoples is not a party, has no involvement, or which appear to refer to specific instances, but lack the specificity needed to determine the Company’s involvement.

51. Specifically, the Complainant references a Commission case at Docket No. M-2023-3019782, an “explosion in the Mifflin Energy Corp case,” the “Plum and Crescent TWP cases,” and pipeline H-109. (Complaint ¶ 4, Attachments, p.1, p.2, and p.3; Complaint ¶ 5.)

52. The Company was not a party to the Commission case at Docket No. M-2023-3019782, nor does the Complaint contain the specificity required to discern what events the Complainant is referring to as the “Plum and Crescent TWP cases.”¹.

53. Moreover, the Company does not own pipeline H-109; it merely has farm tap customers along this line.

54. Without joinder of the named parties, the Commission will not be able to fully resolve the dispute or award relief as to each averment made by the Complainant.

55. Without joinder of the parties relevant to the above-referenced cases and pipelines, the Commission cannot fully resolve the dispute or award relief for averments and requests for relief made which concern these cases.

56. To the extent that the allegations in the Complaint regarding Equitrans, EQT, and PIOGA are not summarily dismissed, Peoples respectfully requests that an Order be issued joining Equitrans, EQT, and PIOGA to the instant proceeding as indispensable parties.

E. PRELIMINARY OBJECTION NO. 5 – THE COMPLAINANT LACKS STANDING TO PURSUE THE COMPLAINT

57. Peoples incorporates by reference Paragraphs 1 through 56 as though fully set forth herein.

58. The Complaint should be dismissed because the Complainant lacks standing as an individual and as a representative of the LLCs he brings this Complaint on behalf of.

¹ Peoples also notes that a reopening of the case at Docket No. M-2023-301978 would be precluded through the legal theory of res judicata, wherein a claim that has been fully litigated in a prior proceeding may not be re-litigated. *See Nehemiah Thomas v. PECO Energy Company*, Docket No. F-2012-2294555, 2012 Pa. PUC LEXIS 831, at *1-2 (May 4, 2012).

59. In order to bring a complaint before a tribunal, a complainant must first demonstrate that they have standing to maintain the action. *Nye v. Erie Insurance Exchange*, 470 A.2d 98, 100 (Pa. 1983).

60. Standing requires that a party have an interest in the matter that is substantial, direct and immediate. *William Penn Parking Garage, Inc. et al. v. City of Pittsburgh*, 346 A.2d 269 (Pa. 1975).

61. A substantial interest is an “interest in the outcome of the litigation which surpasses the common interest of all citizens in procuring obedience to the law. A ‘direct’ interest requires a showing that the matter complained of caused harm to the party’s interest. An ‘immediate’ interest involves the nature of the causal connection between the action complained of and the injury to the party challenging it and is shown where the interest the party seeks to protect is within the zone of interests sought to be protected by the statute of the constitutional guarantee in question.” *George v. Pa. PUC*, 735 A.2d 1282, 1286 (Pa. Cmwlth. 1999). *See also, South Whitehall Twp. Police Service v. South Whitehall Twp.*, 555 A.2d 793, 795 (Pa. 1989) (citations omitted); *Bergdoll, et al. v. Kane, et al.*, 731 A.2d 1261, 1268 (Pa. 1999).

62. The Complainant, as an individual, cannot have a substantial interest where the Complaint appears to refer solely to the business relationships between Peoples and the LLCs.

63. Peoples emphasizes here that, while the Complainant is not named on the gas service account at his address, there are no prior complaints on this account and the Complainant does not receive service at his residence off of a farm tap, transmission, or gathering line.

64. Since the Complainant as an individual appears to have no Complaints towards the gas service Peoples provides to his address, his interest cannot surpass the common interest of all other citizens in procuring obedience to the law.

65. Moreover, the Complainant, as an individual and as a representative of Mifflin Energy Resources and Emerald Energy Services, cannot have a direct or immediate interest where the Complainant has not indicated through his Complaint that he or the LLCs have an interest in the matters he avers.

66. The Complainant has not expressed in the Complaint how the alleged actions or inactions of Peoples have caused specific harm to the Complainant or the LLCs he brings this Complaint on behalf of. Indeed, the Complainant has mentioned Commission cases to which it does not appear he was a party, farm tap holders and residential gas consumers generally, protection of the public, and state and federal taxpayers. (*See* Complaint ¶ 4 and ¶ 5.)

67. Amid these general parties included in the Complaint, the Complainant has failed to aver how the alleged actions of the Company have caused harm to the Complainant or to the LLCs he brings the Complaint on behalf of.

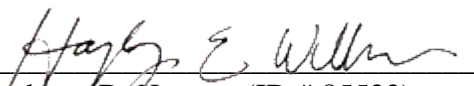
68. Accordingly, the Commission should dismiss the Complaint pursuant to Section 5.101(a)(7) of the Commission's regulations because the Complainant lacks standing. 52 Pa. Code § 5.101(a)(7).

IV. CONCLUSION

WHEREFORE, Peoples Natural Gas Company LLC respectfully requests that the above-captioned Complaint filed by Robert T. Green, Sr. at Docket No. C-2025-3055736 be dismissed in part with prejudice pursuant 52 Pa. Code §§ 5.101(a)(1), (3)-(5), and (7).

Respectfully submitted,

Meagan Moore (ID # 317975)
Jennifer Petrisek (ID # 83411)
Peoples Natural Gas
375 North Shore Drive
Pittsburgh, PA 15212
Phone: 412-208-6527
412-208-6834
E-mail: Meagan.Moore@peoples-gas.com
Jennifer.Petrisek@peoples-gas.com


Anthony D. Kanagy (ID # 85522)
Hayley E. Wilburn (ID # 336055)
Post & Schell, P.C.
17 North 2nd St., 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-612-6034
Fax: 717-731-1985
E-mail: akanagy@postschell.com
hwilburn@postschell.com

Dated: July 3, 2025

Attorneys for Peoples Natural Gas Company
LLC

VERIFICATION

I, STEPHEN KOLICH, being a Director – Gas Supply at Peoples Natural Gas Company LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: July 3, 2025



[EMPLOYEE NAME]