

DATE OF DEPOSIT

Shasta Patrice Brown
Executor for the Ren-Ira Michal Zuri-El Private Estate
P.O. Box 4523
Philadelphia, Pennsylvania Republic 19131

JUL 11 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

July 11, 2025

Pennsylvania Public Utility Commission (PUC)
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: Formal Complaint Filing — Website Failure & Preservation of Rights
PUC Docket No.: C-2024-3050761

To Whom It May Concern,

I, **Shasta Patrice Brown**, in my capacity as **Executor for the Ren-Ira Michal Zuri-El Private Estate**, write to place the **Pennsylvania Public Utility Commission (PUC)** and all responsible parties on formal notice that I have made diligent, repeated attempts to submit my **formal complaint** and supporting filings since **June 23, 2025**.

Due to a **persistent failure of the PUC's own public filing system**, I have been obstructed from submitting my documents through the designated online process as required. This ongoing administrative barrier violates my right to timely file and preserve my equitable and commercial claims.

This letter serves as formal notice that:

- The delay is entirely attributable to the PUC's internal failure to maintain functional, accessible systems for the public.
- I retain all rights to proceed without prejudice to any deadlines, defenses, or attempts to dismiss based on the timeline.
- All commercial claims, equitable demands, statutory remedies, and the Fee Schedule attached remain enforceable, calculated **from the original intended filing date of June 23, 2025**, forward.
- This cover letter and all attached filings must be entered into the docket **nunc pro tunc** as if timely filed on the original date.

This notice shall remain as part of my administrative record as clear evidence of the PUC's continued dishonor, breach of fiduciary duty, and failure to fulfill its mandate to protect the public and preserve access to redress.

I demand immediate written confirmation that this supplemental filing, cover letter, and any affidavits and exhibits are received and docketed **nunc pro tunc** without prejudice.

All rights reserved, without prejudice.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Shasta Patrice Brown". The signature is written in a cursive, flowing style with large, connected letters.

Shasta Patrice Brown

Executor for the Ren-Ira Michal Zuri-El Private Estate

P.O. Box 4523

Philadelphia, Pennsylvania Republic 19131

COVER LETTER

June 25, 2025

Pennsylvania Public Utility Commission
Secretary of the Commission
400 North Street, Keystone Building
Harrisburg, PA 17120

DATE OF DEPOSIT

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Filing of Motion in Docket No. C-2024-3050761

Claimant: Shasta Patrice Brown, Executor for the Ren-Ira Michal Zuri-El Private Estate
vs. Philadelphia Gas Works (PGW)

Dear Secretary:

Please accept for filing the enclosed Motion for Declaratory, Statutory, Injunctive, and Compensatory Relief, including Exhibits A through E, to be entered on the record in the above-captioned docket.

This filing includes verified affidavits and conforms to the rights and protections afforded under the Pennsylvania Constitution, federal law, and commercial law. Claimant respectfully requests the Commission's prompt consideration and performance of its constitutional and fiduciary duties.

If further documentation is required, I am available to supplement the record as needed.

Respectfully submitted,



Shasta Patrice Brown

Executor for the Ren-Ira Michal Zuri-El Private Estate
5233 Heston Street
Philadelphia, Pennsylvania Republic 19131

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No: C-2024-3050761

In the Matter of:

Formal Complaint of Shasta Patrice Brown, Executor for the Ren-Ira Michal Zuri-El Private Estate (Investor-Creditor)

v.

Philadelphia Gas Works (PGW)

MOTION FOR DECLARATORY, STATUTORY, INJUNCTIVE, AND COMPENSATORY RELIEF

NOW COMES, Shasta Patrice Brown, in her official capacity as Executor and Secured Party Creditor for the Ren-Ira Michal Zuri-El Private Estate, and respectfully moves this Honorable Commission to grant declaratory, statutory, injunctive, and compensatory relief under:

The Pennsylvania Constitution, Article I §§ 1, 11, and 26

The U.S. Constitution, Amendments V and XIV

15 U.S.C. § 1681 et seq. (Fair Credit Reporting Act – FCRA)

65 P.S. § 67.101 et seq. (Right-to-Know Law – RTKL)

26 U.S.C. § 6045(f) (Internal Revenue Reporting Limitations)

UCC: §§ 3-501, 3-505, 9-210, 9-607

Case law, equity, and administrative obligations

I. STANDING OF CLAIMANT

Claimant is a secured party creditor and uncompensated investor whose identifying information and private estate were used in the administration of a PGW utility account. PGW billing records identify Claimant by name, establishing both fiduciary interest and evidentiary control.

Standing is established where a party suffers a concrete injury, fairly traceable to the challenged action, that is likely to be redressed by relief. See *Lujan v. Defenders of Wildlife*, 504 U.S. 555 (1992); *Guimond v. Trans Union Credit Info. Co.*, 45 F.3d 1329 (9th Cir. 1995)

II. STATEMENT OF FACTS

Unauthorized Credit Reporting

PGW reported adverse tradelines under Claimant's name to consumer agencies without a signed contract or written consent, in violation of 15 U.S.C. §1681b, §1681s-2(a), and UCC §9-210. No wet-ink signature agreement has been produced. *Jessen v. Vividus, LLC*, 2009 U.S. Dist. LEXIS 18997.

Proof of Legal and Financial Interest

Claimant was added to the PGW account by her daughter and is listed on multiple PGW billing statements, constituting prima facie evidence of financial interest.

Material Misrepresentation

PGW acknowledged Claimant's involvement during informal complaint proceedings, then reversed its position in formal proceedings. *New Hampshire v. Maine*, 532 U.S. 742 (2001).

RTKL Violation

PGW denied a lawful request for billing records under the Right-to-Know Law despite those records naming Claimant. See *SWB Yankees LLC v. Wintermantel*, 45 A.3d 1029 (Pa. 2012).

PUC Administrative Failure

The PUC failed to enforce a valid subpoena issued in this matter. This silence constitutes estoppel and dereliction of duty. See *Commonwealth v. Hughes*, 865 A.2d 761 (Pa. 2004); *U.S. v. Tweel*, 550 F.2d 297 (5th Cir. 1977).

III. LEGAL BASIS

Fiduciary Breach: Use of private information without compensation constitutes fiduciary breach and unjust enrichment. *Spears v. First American eAppraisalT*, 2009 WL 722601.

Fraud and Dishonor: Reversal of facts and refusal to produce records violate UCC §§ 3-501 and 3-505. *In re Estate of Tallarico*, 228 A.2d 736 (Pa. 1967).

Administrative Collusion: PUC's silence following notice and subpoena is legally recognized as acquiescence. *Department of Transportation v. Jerrico, Inc.*, 446 U.S. 238 (1980).

IV. PUBLIC DUTY AND REMEDY RIGHTS

The PUC is bound by oath to uphold Article I of the Pennsylvania Constitution and protect the people from arbitrary deprivation of rights. *Marbury v. Madison*, 5 U.S. (1 Cranch) 137 (1803).

V. NOTICE OF ESCALATION

Failure to resolve these claims shall result in escalation to:

The Commonwealth Court of Pennsylvania

A civil rights claim under 42 U.S.C. §1983

Enforcement via equity and international commercial law

VI. PRAYER FOR RELIEF

1. **Declaratory Judgment:** That PGW violated federal and state law.
2. **Statutory Penalties:** For FCRA, RTKL, and Title 26 violations.
3. **Injunctive Relief:** Removal of credit tradelines, cessation of future reporting, and disclosure of billing records.
4. **Compensatory Relief:** \$4,450,000 per the attached Private Fee Schedule (Exhibit D).
5. **Summary Judgment:** Based on unrebutted affidavits. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242 (1986).
6. **Any other equitable or lawful relief** this Commission deems proper.

EXHIBITS A-E ATTACHED

DATE OF DEPOSIT

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**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

DATE OF DEPOSIT

EXHIBIT A

JUL 1 1 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Affidavit of Credit Harm on Behalf of Injured Third Party

AFFIDAVIT

I, Shasta Patrice Brown, Executor for the Ren-Ira Michal Zuri-El Private Estate, affirm the following:

1. That Philadelphia Gas Works (PGW) reported a tradeline to consumer reporting agencies using the name, estate, and credit information of the Injured Third Party without written consent or verified contract.
2. That said reporting caused financial harm, credit impairment, and denial of opportunities for the Injured Third Party, whose name appeared on PGW billing statements.
3. That no original wet-ink signature contract exists authorizing PGW to securitize or transfer private data for profit.
4. That this harm has continued beyond 2023 and into the present, and constitutes unauthorized commercial use of private credit.

Executed under penalty of perjury.

Date: June 25, 2025

Signed: 

Shasta Patrice Brown

Executor for the Ren-Ira Michal Zuri-El Private Estate

EXHIBIT B

Affidavit of Misrepresentation by PGW

DATE OF DEPOSIT

JUL 11 2025

AFFIDAVIT

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I, Shasta Patrice Brown, Executor for the Ren-Ira Michal Zuri-El Private Estate, testify to the following facts:

1. That PGW acknowledged the existence of the account and Claimant's association with it during the informal complaint stage.
2. That during formal proceedings, PGW reversed its position and falsely claimed that no such account existed, despite producing bills that included Claimant's name.
3. That this reversal constitutes fraud in factum, intentional concealment of records, and misrepresentation of material facts under oath.
4. That PGW has not rebutted any affidavit on record, nor provided lawful justification for these conflicting claims.

I affirm all statements are true and correct to the best of my knowledge.

Date: June 25, 2025

Signed: 

Shasta Patrice Brown

Executor for the Ren-Ira Michal Zuri-El Private Estate

EXHIBIT C

Affidavit of Subpoena and Acquiescence by PUC

AFFIDAVIT

DATE OF DEPOSIT

JUL 11 2025

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

I, Shasta Patrice Brown, Executor for the Ren-Ira Michal Zuri-El Private Estate, affirm the following:

1. That a valid subpoena was issued through formal PUC channels requesting billing ledgers and account documents from PGW.
2. That the Commission failed to enforce the subpoena or issue any lawful response.
3. That said silence constitutes estoppel and acquiescence to PGW's dishonor and misrepresentation.
4. That the PUC's administrative inaction has directly contributed to financial harm, denial of remedy, and obstruction of lawful enforcement.

Executed under penalty of perjury.

Date: June 25, 2025

Signed: 

Shasta Patrice Brown

Executor for the Ren-Ira Michal Zuri-El Private Estate

EXHIBIT D

Private Fee Schedule Summary

DATE OF DEPOSIT

JUL 11 2025

NOTICE AND SCHEDULE OF FEES

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

This Private Fee Schedule is hereby noticed, acknowledged, and activated based on unrebutted affidavits and continued administrative dishonor by PGW and the Pennsylvania Public Utility Commission.

Clause	Description	Fee
4	Failure to Respond	\$200,000
5	Unauthorized Credit Reporting	\$750,000
6	Dishonor Without Cause	\$250,000
7	Fiduciary Breach	\$500,000
8	Intentional Misrepresentation	\$500,000
10	Obstruction of Administrative Process	\$750,000
13	Mail Fraud	\$500,000
15	Acquiescence via Silence	\$1,000,000
	Total Commercial Liability	\$4,450,000

All terms and conditions of this schedule are deemed accepted by both PGW and PUC upon failure to rebut within ten (10) business days.

Date: June 25, 2025

Signed: 

Shasta Patrice Brown

Executor for the Ren-Ira Michal Zuri-El Private Estate

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

EXHIBIT E

Notice of Secured Party Creditor Status

I, Shasta Patrice Brown, hereby give lawful notice to the Pennsylvania Public Utility Commission and all agents thereof that I am the Secured Party Creditor and Executor for the Ren-Ira Michal Zuri-El Private Estate.

By lawful Security Agreement executed between the undersigned and the corporate entity styled as SHASTA PATRICE BROWN, a security interest and equitable claim was established over all property, assets, and instruments associated with the estate. This interest includes but is not limited to accounts, billing records, and identifying numbers administered or accessed by third parties without express consent.

All communications, contracts, or adverse actions made in relation to the estate without full disclosure and wet-ink signature authority are null, void, and unenforceable in law and equity.

This notice is provided pursuant to UCC §§ 1-202, 9-607, and applicable commercial statutes. All rights reserved, without prejudice.

Date: June 25, 2025

Signed: 

Shasta Patrice Brown

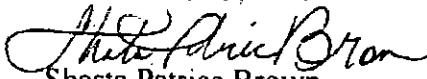
Secured Party Creditor

Executor for the Ren-Ira Michal Zuri-El Private Estate

VERIFICATION

I, **Shasta Patrice Brown**, affirm under penalty of perjury that the facts stated above are true and correct to the best of my knowledge.

Dated: June 25, 2025


Shasta Patrice Brown

Executor for Ren-Ira Michal Zuri-El Private Estate

DATE OF DEPOSIT

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

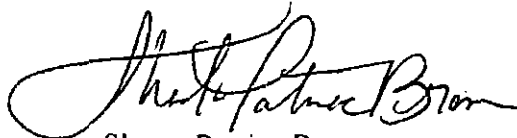
CERTIFICATE OF SERVICE

A true and correct copy was served upon:

- Jamie Panzer, PGW Legal – Jamie.Panzer@pgworks.com
- Graciela Christlieb, Esq. – graciela.christlieb@pgworks.com

By USPS certified mail

Dated: June 25, 2025



Shasta Patrice Brown

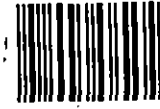
Executor for Ren-Ira Michal Zuri-El Private Estate

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Retail



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U.S. POSTAGE
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PHILADELPHIA,
JUL 11, 2025

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Shasta P Brown

Executive for Ren-ira Michal Zuri-El Private Estate

PO Box 4523

Philadelphia PA 19131

(267) 318 5743

TO:

Rosemary Chavetta

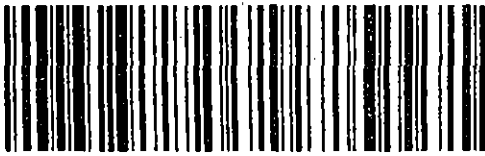
Pennsylvania Public Utility Commission

Commonwealth
Key Stone Bldg 2nd floor

400 North Street

Harrisburg PA 17120

CERTIFIED MAIL



9589 0710 5270 2269 3879 50



CMPC

717-705-1952

To: PUC MASTER

Agency: PUC

Floor:

External Carrier:

7/17/2025 9:49:40 AM

RECEIVED

JUL 17 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



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