

## Pennsylvania Public Utility Commission

Jason Paul :  
Complainant : Case: C-2026 3060106  
:  
Vs :  
Pennelec :  
Respondents :

### Motion to Compel Discovery

Whereas I have attached several exhibits to show that the property wasn't being used at all in 2025 in fact it was in the process of being sold.

At No time Had I received a bill From Pennelc in the time that they said the account was default, I request the Commission Compel Penelc to Produce a Billing history and account history. I also had called into Penelec years before all this and had them cancel that service.

  
Jason Paul

### Certificate of Service

PUC  
400 North Street 2<sup>nd</sup> Floor  
Harrisburg pa 17120  
Secretary's Bureau  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
2nd Floor, Room-N201  
Harrisburg, PA 17120

Angelina Umstead  
FirstEnergy  
341 White Pond Drive  
Akron OH 44320



Office of Attorney General David W. Sunday, Jr.  
Bureau of Consumer Protection  
15<sup>th</sup> Floor, Strawberry Square  
Harrisburg, PA 17120

717-787-3391  
[tgreene@attorneygeneral.gov](mailto:tgreene@attorneygeneral.gov)

Jason Paul  
132 Cessna Hill Road  
Boswell, PA 15531  
October 27, 2025

Re: BCP-HBG-896868-TG  
Steel City House's

Dear Jason Paul:

Your complaint has been received by the Bureau of Consumer Protection. Please refer to your File Number BCP-HBG-896868-TG when corresponding with this office to help us keep accurate and up-to-date records.

**In order to effectively mediate your complaint, at your earliest convenience, please provide me with copies of documents that you believe are relevant and support the allegations in your complaint, please do not send originals.**

A copy of your complaint as presented to the Bureau has been sent to the business with a request for the business to provide a written response to the Bureau within 21 days. We will keep you apprised of significant developments as your case progresses. You will be notified by mail when we receive information regarding your case.

Please note that participation in the mediation process is voluntary and we cannot compel a business to cooperate. If mediation efforts are not successful, you may be advised to seek relief either through a private attorney or through Magisterial District Court. The Bureau cannot provide you with private legal counsel or offer legal advice.

If your complaint has been settled or you have new information that would have a bearing on your complaint, please inform us. We encourage you to submit such information in writing.

On behalf of the Office of Attorney General, thank you for bringing this matter to our attention. We hope to be of assistance in resolving your complaint.

Very truly yours,

Terry Greene  
Agent  
[tgreene@attorneygeneral.gov](mailto:tgreene@attorneygeneral.gov)

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**Response to Complaint ID: BCP-26-05-002953**

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From Karol Kuyper <kuyperkarol@gmail.com>

Date Wed 2/4/2026 2:54 PM

To tgalasso@attorneygeneral.gov <tgalasso@attorneygeneral.gov>

 1 attachment (184 KB)

Purchase and Sale Agreement - 124 Davis St, Johnstown, PA - signed.pdf;

You don't often get email from kuyperkarol@gmail.com. [Learn why this is important](#)

Dear Mr. Galasso,

I am writing to formally respond to the consumer complaint filed by Mr. Jason Paul. The documentation provided with this response clearly demonstrates that Mr. Paul's allegations against me and "Kuyper Property Solutions" are based on a misunderstanding of a transaction to which I was not a party.

- 1. "Kuyper Property Solutions" is Not a Business Entity:** I wish to clarify that "Kuyper Property Solutions" is not a business entity, nor was it ever represented as such to Mr. Paul. As noted in the complaint, the email address [kuyperpropertiesolutions@gmail.com](mailto:kuyperpropertiesolutions@gmail.com) was merely CC'd on correspondence. I use this secondary account strictly as a personal administrative archive to manage storage and keep records of my freelance work; it is not a public-facing business.
- 2. I Am Not a Party to the Agreement:** The enclosed **Purchase and Sale Agreement** for the property at **124 Davis Street, Johnstown, PA**, identifies the legal parties as **Jason Robert Paul** (Seller) and **Steel City Houses LLC** (Buyer). My name does not appear as a principal, buyer, or seller. I am not a member or authorized representative of Steel City Houses LLC.
- 3. Clarification of My Limited Role:** My involvement was strictly as a part-time freelance assistant for the buyer, Steel City Houses LLC. As confirmed by the attached **Adobe Acrobat Sign Final Audit Report**, my role was limited to the administrative task of preparing and emailing the document for signature from my personal account, [kuyperkarol@gmail.com](mailto:kuyperkarol@gmail.com). Any communication I had with Mr. Paul was conducted solely in this capacity as an assistant to my client.
- 4. Matter Already Addressed by the Principal Party:** I spoke with the principal of Steel City Houses LLC, who confirmed that they have already responded to the Bureau regarding this claim. As the contract is between Mr. Paul and that company, any dispute regarding the terms or cancellation of that agreement is strictly between those two parties.
- 5. Response to Allegations:** I am not a real estate agent and have never claimed to be one. Mr. Paul's claims of fraud are unfounded and lack any supporting evidence of a direct business relationship with me.

Because I have no contractual or legal standing in this dispute, I respectfully request that this complaint against me and Kuyper Property Solutions be closed.

Sincerely,

RCVD PUC SEC BUR  
MAR 5 2026 AM 10:46

**Karol Sue Kuyper**

104 South Earl St. Shippensburg, PA 17257

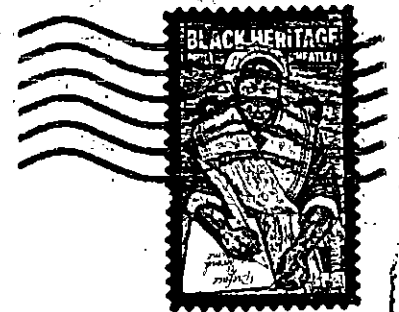
(717) 256-1114

Jason Paul  
132 Cessna Hill RD  
Boswell PA 15531

PUC  
400 North Street  
2<sup>nd</sup> Floor Harrisburg PA  
17120

JOHNSTOWN PA 159

3 MAR 2026 PM 1 L



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