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COMPLAINT OF AMEENAH
MUHAMMAD AGAINST FORTY200
APARTMENT HOMES

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§
§

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PUBLIC UTILITY COMMISSION
OF TEXAS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO AMEENAH MUHAMMAD
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that Ameenah Muhammad by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

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Dated: August 21, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney

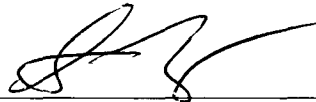


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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record August 21, 2019, in accordance with 16 TAC § 22.74.



Steven M. Gonzalez

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TO AMEENAH MUHAMMAD
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DEFINITIONS

- A. "Mr. Muhammad," or "you" refers to Ameenah Muhammad, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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TO AMEENAH MUHAMMAD
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

- Staff 1-1** Please provide the specific time period(s) for which you are contesting water and sewer service charges.
- Staff 1-2** Please provide the invoices for those time periods which you are contesting.
- Staff 1-3** Please provide a copy of the applicable lease, including any addendums.
- Staff 1-4** Please provide an explanation of any discrepancies between usage and billed water amounts.
- Staff 1-5** Please explain if you contacted Forty200 to dispute allocated water and sewer charges.
- Staff 1-6** Please provide the response, if any, that Forty200 provided to your dispute.