



Filing Receipt

Filing Date - 2024-06-27 01:13:34 AM

Control Number - 56589

Item Number - 76

PUC DOCKET NO. 56589

PETITION BY RESIDENTS OF GRAND	§	BEFORE THE
LAKES MUNICIPAL UTILITY DISTRICT	§	
NO. 2 APPEALING THE WATER RATES	§	PUBLIC UTILITY COMMISSION
ESTABLISHED BY THE DISTRICT'S	§	
BOARD OF DIRECTORS	§	OF TEXAS

APPELLANT'S REQUEST FOR INFORMATION NO. 10, FILED UNDER 16 TAC § 22.144

(1) Because the Public Utility Commission of Texas (Commission) and the State Office of Administrative Hearings (SOAH) must, in their Findings of Fact and Conclusions of Law, rely on data and information that are 100% indisputable, the Grand Lakes ratepayers / residents become obliged to use discovery to reveal answers related to the contested rate order, the Municipal Utility District's (MUD's) financial situation, and the MUD's compliance with all relevant statutes (Texas Water Code, Texas Government Code, Texas Local Government Code, etc.).

(2) The Grand Lakes community hosts 37 commercial entities and 2,739 residences (682 residences within MUD No. 2, 985 residences within MUD No. 4, and 1,072 residences within MUD No. 1). The three Grand Lakes MUDs and the Grand Lakes WCID are administered by the same Attorney (the law firm Schwartz, Page & Harding LLP) and operated by the same water company (Municipal District Services | MDS Water). Almost the same set of Consultants serve the Grand Lakes MUDs and WCID.

(3) The Grand Lakes Community Association, Inc. (GLCAI) is a homeowner association that upkeeps all property within the Grand Lakes community.

(4) Richard Powell, a real-estate agent and President of GLCAI's Board of Directors, was admonished by many in the Grand Lakes community for ruling as an autocrat; refusing to sign the Community Association's Code of Conduct under the false claim that he did not need to being a volunteer; abolishing the Association's annual audit and discarding the Association's financial reports every three years; influencing and/or tampering with the election results; amending the Association's bylaws for personal benefits; indifference about and mishandling of residents' funds; and more.

(5) The Grand Lakes MUDs and Community Association claim to work on some shared community projects. Worrying situations result, including—but are not limited to—conflicts of interest, troubling voting on budges and projects, and the possibility of mishandling funds as money is transferred from the MUDs to the GLCAI. Irregularities mean a stark disregard for the fundamentals of democracy, governance, justice, and the rule of law.

(6) Filed pursuant to 16 Texas Administrative Code § 22.144, **Request for Information No. 10** poses one question: Fill in the following table by stating by value, date, and exact description (never using ‘other’) each monetary amount Grand Lakes MUD No. 2, MUD No. 1, and MUD No. 4 transferred to the Grand Lakes Community (Homeowner) Association during the years 2018 to 2023. Because the shared community projects involve the four entities, the full picture can *only* be seen when the amounts transferred by all three Grand Lakes MUDs to the Community Association are detailed. The multi-year amounts will reveal if enormous year-over-year increases materialized; a troubling situation with *multiple* incidents observed and documented throughout the Grand Lakes MUDs’ financial figures.

	2023	2022	2021	2020	2019	2018
GLMUD2 to GLCAI						
- Item no. a						
- Item no. b						
- Item no. c						
- Item no. d						
- Item no. e						
GLMUD1 to GLCAI						
- Item no. k						
- Item no. l						
- Item no. m						
- Item no. n						
- Item no. o						
GLMUD4 to GLCAI						
- Item no. v						
- Item no. w						
- Item no. x						
- Item no. y						
- Item no. z						

(7) Instructions and guidance:

- The MUD’s Attorney, the law firm **Schwartz, Page & Harding LLP**, is ineligible to answer on behalf of, or to attempt to influence or guide, the MUD’s Board, Operator, Bookkeeper, or Auditor.
- Responses to this RFI must not be coordinated. Doing so will be punishable.
- Individuals responding to this RFI must state their name, title, and affiliation and deliver their statement under oath.
- Individuals responding to this RFI must not seek the guidance of an attorney. They must *unhesitatingly* furnish all material and details in their possession.

(8) With obvious abuse of the discovery process (incomplete responses, delays, refusals, objections, etc), a Motion to Compel will ask the Commission to intervene.

Katy, Texas on the 27th day of June 2024.

Respectfully submitted,

on behalf of Grand Lakes MUD No. 2 ratepayers



George J. Wakileh, Ph.D.
6819 Rosemont Park Ln
Katy, TX 77494-6590
george.wakileh@gmail.com

PUC DOCKET NO. 56589

CERTIFICATE OF SERVICE

I certify that the filing of this RFI is being notified to all parties of record via e-mail on June 27, 2024.

- The Board via the District's Attorney (the law firm Schwartz, Page & Harding LLP).
- PUCT's Legal Division | Attorney assigned to this docket.



George J. Wakileh, Ph.D.