



Filing Receipt

Filed Date - 2025-05-27 02:54:46 PM

Control Number - 56659

Item Number - 96

**SOAH DOCKET NO. 473-25-14209
PUC DOCKET NO. 56659**

**COMPLAINT OF SARA BLACK
AGAINST MOBILE LOAVES &
FISHES, INC.**

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**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS**

**MOBILE LOAVES & FISHES, INC.'S RESPONSES TO
SARA BLACK'S SECOND SET OF REQUESTS FOR INFORMATION**

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**MOBILE LOAVES & FISHES, INC.'S RESPONSES TO
SARA BLACK'S SECOND SET OF REQUESTS FOR INFORMATION**

Mobile Loaves & Fishes, Inc. ("MLF") files this response to Sara Black's Second Set of Requests for Information. In accordance with the Commission's *Order Suspending Rules* entered in Docket No. 50664, MLF has provided notice, by email, to all parties that MLF's Responses to Sara Black's Second Set of Requests for Information have been filed with the Commission and are available for download from the Commission's Interchange website.

I. WRITTEN RESPONSES

MLF's written responses to Sara Black's Second Set of Requests for Information is attached and incorporated by reference. The response is stated on or attached to a separate page on which the request has been restated. MLF's responses are made in the spirit of cooperation without waiving MLF's right to contest the admissibility of any of these matters at hearing. In accordance with 16 Tex. Admin. Code ("TAC") § 22.144(c)(2)(A), the response lists the preparer or person under whose direct supervision the response was prepared and any sponsoring witness. When MLF provides certain information sought by the request while objecting to the provision of other information, it does so without prejudice to its objection in the interests of narrowing discovery disputes under 16 TAC § 22.144(d)(5). Pursuant to 16 TAC § 22.144(c)(2)(F), MLF stipulates that its responses may be treated by all parties as if they were made under oath.

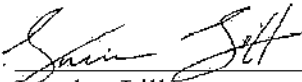
II. INSPECTIONS

If responsive documents are more than 100 pages but less than eight linear feet in length, the response will indicate that the attachment is voluminous ("V") and will be provide by secured document transfer link.

If a response or the responsive documents are provided pursuant to the protective order in this docket, the response will indicate that it or the attachment is either confidential ("CONF") or

highly sensitive protected material ("HSPM") as appropriate under the protective order. Confidential and highly sensitive protected materials will be served on all parties that have signed and filed the certification under the protective order entered in this docket. Confidential and highly sensitive responsive voluminous documents will be provided by secured document transfer link.

Respectfully submitted,

By: 
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ATTORNEYS FOR MOBILE LOAVES & FISHES, INC

RESPONSES

RFI NO. 2-1

Provide a complete copy of any and all active and inactive contracts, grants and agreements between MLF and the City of Austin and/ or Travis County since January 1, 2020 that awarded MLF money, loans or a waiver of payment for any purpose.

RESPONSE:

MLF has filed an objection to RFI No. 2-1.

RFI NO. 2-2

Provide the cumulative amount from any money source that MLF used to pay for electricity costs for MLF and /or residents for years 2022-2024. Breakdown totals between Residents and MLF and the respective year.

RESPONSE:

MLF has filed an objection to RFI No. 2-2.

RFI NO. 2-3

Provide any and all documentation regarding the \$21 state discount listed on the Travis County Register of Actions page for MLF's eviction cases that identify its purpose, usage and origin (the name of the Texas state agency that awarded it.) It is possible the award document may provide and satisfy all information requested.

RESPONSE:

MLF has filed an objection to RFI No. 2-3.

RFI NO. 2-4

Provide the MLF eviction filing receipts from Travis County JP1 from March 1, 2024 to May 30, 2024.

RESPONSE:

MLF has filed an objection to RFI No. 2-4.

RFI NO. 2-5

Provide a copy of the 1st quarter 2023 letter from MLF to CF!V tiny homes residents telling them that they no longer have to pay utility charges because all bills are paid starting March 2023. One copy of the form letter that was sent out may satisfy this request.

RESPONSE:

MLF has filed an objection to RFI No. 2-5.

The next four questions are from the January 2024 New York Times article on MLF titled, Can a Big Village Full of Tiny Homes Ease Homelessness in Austin? (see item 23). A few pages from the article are attached to assist with context.

RFI NO. 2-6

Provide a copy of the 2023 HUD waiver described in the NYT article where HUD lowered their standard for a single room occupancy (SRO) dwelling unit to include a MLF tiny home with no bathroom or kitchen so that a HUD voucher could be used. City of Austin and Travis County helped MLF secure this waiver. (See exhibit 1 a-lb)

RESPONSE:

MLF has filed an objection to RFI No. 2-6.

"For about \$25,000 a year, Mr Graham's organization subsidizes one person's housing at the village." "So far, this has been paid for entirely by private donations and in small part from collecting rent."

RFI NO. 2-7

Please break down the amounts for each focus area of this 25k housing subsidy.

RESPONSE:

In the quote above, Mr. Graham states that generally \$25,000 is needed to support the housing provided by MLF for one person per year. The table below illustrates, as a general matter, the amount MLF spends per person beyond what it collects in rent.

	Total Expenses	Total Rental Income	Total CF!V Population	Subsidy per Person*
2022	\$12,142,199	\$1,602,097	388	\$27,165
2023	\$16,467,572	\$1,900,036	420	\$34,685
2024	\$17,568,069	\$1,992,380	445	\$35,002

* Total Expenses less Rental Income divided by the Total CF!V Population

Preparer: Tricia Graham
Sponsor: Tricia Graham

RFI NO. 2-8

What is the amount of the housing subsidy provided to Sara Black from 2022 thru the end of 2024? Breakdown by year.

RESPONSE:

MLF does not track the total subsidies provided to each specific neighbor. As a general matter, the per person subsidy is indicated in MLF's response to RFI No. 2-7.

Preparer: Tricia Graham

Sponsor: Tricia Graham

"Their incomes average \$900 a month, making even tiny homes impossible to afford without help, Mr Graham said. " (see Exhibit 2)

RFI NO. 2-9

Provide the calculation showing that \$900/month is not enough to pay rent at Community First Village per the quote from MLF CEO and Founder Alan Graham. (see Exhibit 2 with page from article for more context).

RESPONSE:

MLF's operations would not be sustainable if MLF relied solely on the Neighbors' average monthly income of \$900 per month to pay its expenses. For example, in 2024, MLF provided roughly \$3,763 in services to Neighbors per month. Thus, even \$900 per month (the entire average monthly income of the Neighbors) is not nearly enough to support MLF's services.

	MLF's Average Monthly Expenses	Number of Neighbors	MLF's Average Monthly Expenses per Neighbor
2022	\$1,011,849.92	336	\$3,011.46
2023	\$1,372,297.67	368	\$3,729.07
2024	\$1,464,005.75	389	\$3,763.51

Preparer: Tricia Graham

Sponsor: Tricia Graham

RFI NO. 2-10

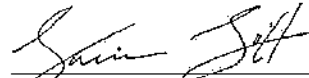
Provide a copy of the full surveillance video from the May 7, 2025, installation of Sara Black's new meter at her home at 1211 Mi Casa starting from the first arrival of any MLF staff including their hired electrician at Black' s home and ending after all MLF staff leave after installation.

RESPONSE:

MLF has filed an objection to RFI No. 2-10.

CERTIFICATE OF SERVICE

I certify that on May 27, 2025, this instrument was filed with the Public Utility Commission of Texas and a true and correct copy was served on all parties of record by email in this proceeding in accordance with the SOAH Order No. 1 in this docket.



Landon Lill