



## Public Service Commission

CAPITAL CIRCLE OFFICE CENTER ● 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U

DECEMBER 9, 1999 DATE:

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYO)

FROM: DIVISION OF LEGAL SERVICES (VACCARO)

DIVISION OF COMMUNICATIONS (BIEGALSKI)

RE: DOCKET NO. 991664-TX -INITIATION OF SHOW CAUSE

> PROCEEDINGS AGAINST RICHARD AUSTIN FOR APPARENT VIOLATION 25-24.805, F.A.C., CERTIFICATE

CONVENIENCE AND NECESSITY REQUIRED.

**AGENDA:** 12/21/99 - REGULAR AGENDA - SHOW CAUSE - INTERESTED

PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

PLACE DOCKETS 990971-TX, 991663-TX, AND SPECIAL INSTRUCTIONS:

991664-TX IN SEQUENCE ON AGENDA CONFERENCE

SCHEDULE.

FILE NAME AND LOCATION: S:\PSC\CMU\WP\991664.RCM

## CASE BACKGROUND

- September 1998 TeleConex, Inc. d/b/a TeleConex (TeleConex), a certificated alternative local exchange company (ALEC), entered into a marketing arrangement with CIO, Inc. (CIO).
- May 9, 1999 CIO entered into a marketing agreement with Pre-Cell Solutions, Inc. (Pre-Cell), another certificated ALEC.
- May 12, 1999 The Division of Consumer Affairs (CAF) received a complaint lodged by TeleConex against Pre-Cell regarding Family Phone Company (a.k.a. CIO) calling TeleConex's customers and telling them that TeleConex is bankrupt and going out of business.

DOCUMENT NUMBER-DATE

15115 DEC-98

FPSC-RECORDS/REPORTING

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- June 24, 1999 Staff met with TeleConex to discuss the problems they were having with CIO. TeleConex stated that CIO was collecting money from customers on its behalf and not forwarding the monies to TeleConex. In addition, TeleConex alleged that CIO was marketing TeleConex's customers stating that TeleConex was in bankruptcy and it could provide the customers with a less expensive service. (Attachment A, pages 7-10)
- July 27, 1999 C.I.O., Inc. (CIO) submitted its application for alternative local exchange service (ALEC) in the State of Florida.
- July 30, 1999 Staff mailed a letter to CIO stating that it needed to amend its corporate name, price list and the application.
- September 13, 1999 After no response from CIO to the July 30, 1999 letter, staff mailed a certified letter to CIO requesting that the amendments be made before September 28, 1999, or staff would recommend denying its application. The letter was signed for and received on September 16, 1999.
- September 21, 1999 CIO submitted a revised application along with a request to withdraw its price list along with a statement that prior to providing local service, CIO would submit a price list.
- September 27, 1999 Staff requested deferral of this docket from the October 5, 1999 Agenda Conference.
- September 28, 1999 Pre-Cell terminated its marketing agreement with CIO for CIO's failure to remit monies collected from customers for telephone service to Pre-Cell.
- October, 1999 Staff began receiving complaints from customers regarding CIO and Pre-Cell.
- October 20, 1999 Notice was sent to Mr. Richard Austin, president of CIO, by the Division of Auditing and Financial Analysis informing him of an investigation of financial records.
- October 22, 1999 BellSouth provided staff a list of telephone accounts that were billed to CIO and a list of telephone accounts billed to one account in the name of

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Richard Austin. BellSouth disconnected all these accounts as fraudulent. (Attachment B, pages 11-15)

- November 12, 1999 Staff received an audit report stating that CIO had failed to allow audit staff in to review financial records.
- November 15, 1999 All telephone numbers used by staff to contact CIO were disconnected.

## DISCUSSION OF ISSUES

**ISSUE 1:** Should the Commission order Richard Austin to show cause why a fine of \$25,000 should not be imposed for apparent violation of Rule 25-24.805, Florida Administrative Code, Certificate of Public Convenience and Necessity Required?

RECOMMENDATION: Yes. The Commission should order Richard Austin to show cause in writing within 21 days of the issuance of the Commission's Order why he should not be fined \$25,000 for apparent violation of Rule 25-24.805, Florida Administrative Code, Certificate of Public Convenience and Necessity Required. Mr. Austin's response should contain specific allegations of fact or law. If Richard Austin fails to respond to the show cause order, the fine should be deemed assessed. If the fine is not paid within ten business days after the Order becomes final, it should be forwarded to the Office of the Comptroller for collection. If the fines are paid, they should be remitted by the Commission to the State of Florida General Revenue Fund pursuant to Section 364.285, Florida Statutes. (Biegalski)

STAFF ANALYSIS: Staff became aware of the operations of Richard Austin, President of CIO, on June 24, 1999, through its meeting with TeleConex. TeleConex informed staff that CIO (a.k.a. Family Phone Company) was representing itself as a telecommunications provider in its solicitation for service. At this time, staff notified CIO that it needed to obtain a certificate.

On May 9, 1999, CIO entered into an agreement with Pre-Cell, effectively conducting business in the same manner as it had during its relationship with TeleConex. CIO continued representing itself

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as a telecommunications provider, in addition to not paying Pre-Cell, while marketing and collecting payments for Pre-Cell.

After his relationship with Pre-Cell was terminated, Mr. Richard Austin could no longer obtain local exchange services from BellSouth by ordering it under the name Pre-Cell. Staff alerted BellSouth that CIO did not have a certificate to provide ALEC services in Florida and requested information from BellSouth regarding the number of accounts it may have provisioned for CIO. BellSouth's research showed that accounts existed in CIO's name plus Richard Austin's name. Apparently when Mr. Richard Austin had difficulty convincing a BellSouth representative to establish the account in CIO's name, he would open an account in his personal name. According to information provided by BellSouth, it appears that Mr. Richard Austin ordered in his own name and received approximately 50 local exchange service accounts for various addresses throughout Florida. Apparently, Mr. Richard Austin would then bill end users residing at the addresses for which he ordered In effect, Mr. Richard Austin was local exchange services. reselling local exchange services without having a certficate of public convenience and necessity approved by the Commission.

By Section 364.285, Florida Statutes, the Commission is authorized to impose upon any entity subject to its jurisdiction a penalty of not more than \$25,000 for each offense, if such entity is found to have refused to comply with or to have willfully violated any lawful rule or order of the Commission, or any provision of Chapter 364. Utilities are charged with knowledge of the Commission's rules and statutes. Additionally, "[i]t is a common maxim, familiar to all minds, that 'ignorance of the law' will not excuse any person, either civilly or criminally." Barlow v. United States, 32 U.S. 404, 411 (1833).

Staff believes that Mr. Richard Austin's conduct by ordering local exchange telecommunications services in his own name, for addresses he did not occupy or have an affiliation, then separately charging the end users for these services, is provisioning ALEC services without a certificate of public convenience and necessity, in apparent violation of Commission Rule 25-24.805, Florida Administrative Code, has been "willful" in the sense intended by In Order No. 24306, issued Section 364.285, Florida Statutes. April 1, 1991, in Docket No. 890216-TL, In re: Investigation Into The Proper Application of Rule 25-14.003, F.A.C., Relating To Tax Savings Refund for 1988 and 1989 For GTE Florida, Inc., having found that the company had not intended to violate the rule, the Commission nevertheless found it appropriate to order it to show cause why it should not be fined, stating that "In our view, willful implies intent to do an act, and this is distinct from DOCKET NO. 991664-14 DATE: December 9, 1999

intent to violate a rule." Thus, any intentional act, such as Mr. Richard Austin's conduct at issue here, would meet the standard for a "willful violation."

Therefore, the Commission should order Mr. Richard Austin to show cause in writing within 21 days of the issuance of the Commission's Order why he should not be fined \$25,000 for apparent violation of Rule 25-24.805, Florida Administrative Code, Certificate of Public Convenience and Necessity Required. Mr. Richard Austin's response should contain specific allegations of fact or law. If Mr. Richard Austin fails to respond to the show cause order, the fine should be deemed assessed. If the fine is not paid within ten business days after the Order becomes final, it should be forwarded to the Office of the Comptroller for collection. If the fines are paid, they should be remitted by the Commission to the State of Florida General Revenue Fund pursuant to Section 364.285, Florida Statutes

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**ISSUE 2:** Should this docket be closed?

RECOMMENDATION: If staff's recommendation in Issue 1 is approved, then Mr. Richard Austin will have 21 days from the issuance of the Commission's show cause order to respond in writing why he should not be fined in the amount proposed. If Mr. Richard Austin timely responds to the show cause order, this docket should remain open pending resolution of the show cause proceeding. If Mr. Richard Austin fails to respond to the show cause order, the fine will be deemed assessed. If the fine is not received within ten business days after the expiration of the show cause response period, it should be forwarded to the Office of the Comptroller for collection and this docket may be closed administratively. (Vaccaro)

STAFF ANALYSIS: If staff's recommendations in Issue 1 is approved, then Mr. Richard Austin will have 21 days from the issuance of the Commission's show cause order to respond in writing why he should not be fined in the amount proposed. If Mr. Richard Austin timely responds to the show cause order, this docket should remain open pending resolution of the show cause proceeding. If Mr. Richard Austin fails to respond to the show cause order, the fine will be deemed assessed. If the fine is not received within ten business days after the expiration of the show cause response period, it should be forwarded to the Office of the Comptroller for collection and this docket may be closed administratively.

DOCKET NO. 991664-TX DECEMBER 9, 1999 ATTACHMENT A

## SUZANNE FANNON SUMMERLIN ATTORNEY AT LAW

1311-B Paul Russell Road, Suite 201 Tallahassee, Florida 32301 TELEPHONE (850) 656-2288 TELECOPIER (850) 656-5589

June 30, 1999

Mr. Rick Moses
Bureau Chief
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Dear Mr. Moses:

As you requested, I am providing the following summary of our meeting on Thursday, June 24, 1999, between Teleconex and the Commission Staff. As you recall, Teleconex was represented in this meeting by Steve and Marilyn Watson and myself and the Commission Staff included yourself, Cathy Bedell, Elaine Johnson, Donna Clemons, and Ray Kennedy. Steve Watson is the owner of Teleconex, along with his wife, Marilyn, and his sons, Chris and Paul Watson.

In August 1998, Chris Watson of Teleconex first met Rick Austin and struck up a friendship. Mr. Austin proposed to become a master agent for Teleconex in the Melbourne, Florida, area. He stated he would organize agents to sell Teleconex's prepaid dial tone services through various entities such as Pak Mail stores, check cashing stores, etc., including his own check cashing company called "CIO" which stands for "Check It Out". As far as Teleconex can determine, Mr. Austin uses CIO and a company he created called "Family Phones" as marketing entities for the sale of prepaid telephone services. Mr. Austin began submitting orders to Teleconex on behalf of his agents in September 1998.

Before very long, Teleconex realized that Mr. Austin was not depositing the monies he was receiving from customers for Teleconex's services into Teleconex's account at the First Union Bank in Melbourne, Florida, as he was clearly expected to do. The arrangement had been set up to have all monies deposited into Teleconex's account and then Teleconex would send Mr. Austin the commissions he earned on the new customers he brought to Teleconex. Mr. Austin also misrepresented, without authorization from Teleconex, that he was an officer of Teleconex to many entities, including advertising agencies, banks, and others, by which method he incurred substantial financial obligations that Teleconex is currently grappling with.

At the point in March 1999 that Mr. Austin recognized that Teleconex expected immediate payment of the approximate \$74,000 in payments he had collected from customers for Teleconex's services (and this amount includes no commissions owed to Mr. Austin by Teleconex), Mr. Austin made an offer to purchase Teleconex. In the course of these discussions, it became clear that Mr. Austin had very poor credit and would be unable to carry through on any offer to buy Teleconex. At that point, Teleconex terminated its arrangement with Mr. Austin. Mr. Austin was very unhappy that Teleconex was not interested in selling the company to him, as well as the fact that he knew he owed Teleconex approximately \$74,000 and would now have no arrangement by which to collect further payments and commissions from customers for Teleconex's services.

Mr. Austin soon entered into an arrangement with Pre-Cell Solutions, Inc., to sell Pre-Cell's prepaid dial tone services. Mr. Austin took the list of Teleconex's customers that he had in his possession and used this to target Teleconex's customers. He phoned Teleconex's customers and slandered Teleconex by telling these customers that Teleconex was bankrupt and unstable and about to go out of business. Mr. Austin told these customers that they were in danger of losing their telephone service if they stayed with Teleconex. Then Mr. Austin would offer the customers \$5.00 off of their monthly bill if they switched their service to Pre-Cell. This activity caused Teleconex grievous harm by causing customers to become upset and confused, as well as causing some customers to switch their service to Pre-Cell. In addition to this campaign against Teleconex through direct contacts with Teleconex's customers, Mr. Austin has waged a war against Teleconex by constantly sending the company threatening faxes, telling lies about Teleconex to the Florida Public Service Commission Division of Consumer Affairs, and by incurring numerous financial obligations using Teleconex's name and credit without authorization.

In an effort to defend itself against these actions by Mr. Austin (and thus, CIO, Family Phones, and/or Pre-Cell), Teleconex sent its customers a notice informing them it had become aware that another company was making calls to its customers stating Teleconex was bankrupt, unstable and going out of business. In the notice, Teleconex told its customers that these statements were untrue and, if they had received such a call, they should call the Florida Public Service Commission and complain. Teleconex also told its customers they should call Teleconex's business office to straighten out any problem with their service resulting from these calls. Subsequently, Teleconex received many phone calls from upset customers and Teleconex responded to these calls. Teleconex has never initiated calls to its customers on this topic. It has only responded to customer inquiries.

It is necessary to respond to Mr. Austin's claim that Teleconex disconnected Mr. Austin's telephone services. Teleconex had initially set up several 800 lines for its own use. At the beginning of the relationship between

Teleconex and Mr. Austin, Mr. Austin was permitted to use some of these lines for his local service in Melbourne, Florida. When Teleconex terminated its relationship with Mr. Austin, Teleconex transferred these 800 lines back to Teleconex's own use.

Teleconex has determined that Mr. Austin, CIO, Family Phones and/or Pre-Cell have lured some customers away from Teleconex, but then failed to timely convert their service. Therefore, when Teleconex made its routine courtesy calls to customers for whom they had not received payment, and the customers confirmed that they had no desire to remain with Teleconex because they had signed up with a new provider, Teleconex ended up disconnecting customers that believed they had switched to CIO, Family Phones, or Pre-Cell. Teleconex did not know, and was not responsible to assure, whether these customers had in fact been converted to a different provider. CIO, Family Phones, Pre-Cell and/or Mr. Austin blamed Teleconex for this disconnection of service when, in fact, the customers might have paid CIO, Family Phones, Pre-Cell and/or Mr. Austin but CIO, Family Phones, Pre-Cell and/or Mr. Austin but CIO, Family Phones, Pre-Cell and/or Mr. Austin had failed to transfer their service in a timely manner.

Several customers have communicated to Teleconex that someone called them, saying they were from CIO, Family Phones and/or Pre-Cell, to attempt to get their business by stating that Teleconex was in bad financial shape and was going out of business. Attached are several customer letters as examples of this. This raises the issue of the inappropriate representation of Family Phones or CIO as a "telephone company".

Teleconex has filed a lawsuit against Mr. Austin and CIO, which was filed approximately one-half hour after a lawsuit was filed by Mr. Austin and CIO against Teleconex. Teleconex is also pursuing possible remedies with the Florida Attorney General.

Subsequent to our meeting, you sent a list of customers that Mr. Austin had provided to you as representing his customers (presumably Pre-Cell's customers). Enclosed is a copy of three pages of that list of customers. Because this effort to trace customers is so time-consuming, Mr. Watson has investigated the customers listed on just the first three pages to illustrate the situation. All customers marked with an asterisk are former Teleconex customers that were targeted by Mr. Austin as CIO, Family Phones and/or Pre-Cell.

As an update, Teleconex was contacted by one of its customers (using resold Sprint local service) who reported she received a call Friday evening, June 25, 1999, from an individual from Pre-Cell telling her that Teleconex was unstable and going bankrupt and that she needed to switch her service to their company. She refused and called Teleconex. I have spoken directly with this

lady. She is willing to sign an affidavit to this effect. I will send it to you as soon as I receive it.

As you can see, although this can be characterized as a "dispute between two companies," it is a problem that has negatively affected the customers a great deal. Teleconex has not caused this problem. Teleconex has tried very hard to limit the harm to its customers that Mr. Austin and CIO and/or Pre-Cell have inflicted. Teleconex has suffered tremendous financial and reputation damage from these actions by Mr. Austin, CIO, Family Phones, and/or Pre-Cell. This is not to mention the severe emotional stress the whole situation has caused the owners of Teleconex, the Watson family. Thank you for any assistance you can offer as a member of the Staff of the Florida Public Service Commission to resolve this matter.

Sincerely

Suzanne F. Summerlin

SFS/wd
Attachments (2)
cc: Cathy Bedell, Esq.
Elaine Johnson
Ray Kennedy
Donna Clemons, Esq.
Steve and Marilyn Watson

DOCKET NO. 991664-TX
DECEMBER 9, 1999

407 755 1159 393 \*MEM2\* SEP 28 1999 \*LIVE\*
E04 & JRC ONLINES DOWN 6PM FRI NPA SPLIT
RICHARD AUSTIN AMT DUE 156.95

9E MELB VR3CL

PYRC

DATE TYPE NOTATIONS

					FU	ACT	USERID
				016 SHAK #N7CGKC		***	SQ20MFS1
0927				935 SHAK #N62YNT		***	SQ20JRC1
0927	IMAT	NEW SVC IN NF	904 737-0057	306 SHAK #NB2FCH		***	SQ20JRC1
0927	IMAT	NEW SVC IN NF	904 762-3414	466 SHAK #NCB3DW			SQ20JRC1
0927	IMAT	NEW SVC IN NF	904 771-1004	004 SHAK #N803G4			SQ20JRC1
0927	IMAT	NEW SVC IN NF	407 757-9633	774 SHAK #NBTN6L			SQ20JRC1
0927	IMAT	NEW SVC IN NF	904 220-7400	412 SHAK #N8H19K			SQ20JRC1
0927	IMAT	NEW SVC IN NF	407 259-7277	513 SHAK #N1XQRP			SQ20JRC1
				758 SHAR #N286RR			SQ20JRC1
				205 SHAK #N34GGB			SQ20JRC1
			•	251 SHAK #ND8923			SQ20JRC1
		163616 REVIEW					BYRPHXY
	_	222631 AUTO DE		LE - RTA			RI10B05L
0909		\$173.39		5 0909 T009 1MN 0232			TIPS1MN
		135459 MCC SEN	·	3 0303 1003 IMM 0232			
			II RCA				LXCDLWH
0901		TRT					LXCDLWH
0901	MCC	+1 ,PB0909 A	170.90		0912	DRC	LXCDLWH
0901	RCKX	170.90	170.90NSF	RCCY		***	RI10B051

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9E MELB VR3CL

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DATE TYPE NOTATIONS

											FU	ACT	USERID
							•						
0928	IMAT	NEW	SVC	IN	nf	407	723-9618	612	SHAK	#NDPP6G		***	SQ20JRC1
0928	IMAT	NEW	SVC	IN	np	407	835-9510	459	SHAK	#N2Q0KR		***	SQ20JRC1
0928	IMAT	NEW	SVC	IN	nf	407	726-8080	562	SHAK	#ngfcxy		***	SQ20JRC1
0928	IMAT	NEW	SVC	IN	np	904	384-0975	754	SHAK	#n26WTN		***	SQ20JRC1
0928	IMAT	NEW	SVC	IN	np	904	766-4211	703	SHAK	#NG6BKV		***	SQ20JRC1
0928	IMAT	NEW	SVC	IN	np	904	491-8777	021	SHAK	#N97 <b>F</b> 98		***	SQ20JRC1
0928	IMAT	NEW	SVC	IN	nf	904	328-4552	129	SHAK	#NCFVMJ		***	SQ20JRC1
0928	IMAT	NEW	SVC	IN	SE	561	586-5072	619	SHAK	#NCC5MB		***	SQ20MFS1
0928	IMAT	NEW	SVC	IN	NF	407	733-3789	282	SHAK	#NG5K0D		***	SQ20JRC1
0928	IMAT	NEW	SVC	IN	nf	407	674-0296	779	SHAK	#n8xbgf		***	SQ20JRC1
0928	IMAT	NEW	SVC	IN	SE	561	794-3738	759	SHAK	#NCWQ32		***	SQ20MFS1
0927	IMAT	NEW	SVC	IN	nf	407	952-1919	727	SHAK	#NEMIVT		***	SQ20JRC1
0927	IMAT	NEW	SVC	IN	np	904	886-9349	382	SHAK	#N007GK		***	<del></del>
0927							805-9991					***	SQ20JRC1
0927	IMAT	NEW	SVC	IN	nf	407	275-0513	513	SHAK	#NCDV54		***	SQ20JRC1
0927							297-6380					***	_
0927							733-0873				٠	***	_
							620-0872					***	SQ20MFS1

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407 733 1459 393 \*MEM2\* SEP 28 1999 \*LIVE\*
E04 & JRC ONLINES DOWN 6PM FRI NPA SPLIT
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DATE TYPE NOTATIONS

											FU	ACT	USERID
1001	IMAT	NEW	SVC	IN	nf	904	306-0007	491	SHAK	#ND81MD		***	SQ20JRC1
1001	IMAT	NEW	SVC	IN	nf	904	783-2397	464	SHAK	#nbhfck		***	SQ20JRC1
0930	IMAT	NEW	SVC	IN	SE	561	873-1645	565	SHAK	#NDP4LC		***	SQ20MFS1
0930	IMAT	NEW	SVC	IN	nf	904	665-0055	119	SHAK	#NGC8DH		***	SQ20JRC1
0930	IMAT	NEW	SVC	IN	nf	904	646-4463	437	SHAK	#N21GL6			SQ20JRC1
0930	IMAT	NEW	SVC	IN	NF	904	762-9228	241	SHAK	#N75MWB		***	_
0930	IMAT	NEW	SVC	IN	nf	407	984-9880	916	SHAK	#nbhjft		***	SQ20JRC1
0930							358-9046						
0930							674-0376					***	_
0929	IMAT	NEW	SVC	IN	SE	561	493-1707	615	SHAK	#N9N3K6		***	_
0929	IMAT	NEW	SVC	IN	NT	904	996-0036	309	SHAK	#N49KOW		***	_
							772-6025						SQ20JRC1
							739-9811			••			SQ20JRC1
							249-2239			**			SQ20JRC1
							766-2120			••			SQ20JRC1
0928					_		836-5762					***	
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407 733 1459 393 \*MEM2\* SEP 28 1999 \*LIVE\* E04 & JRC ONLINES DOWN 6PM FRI NPA SPLIT RICHARD AUSTIN AMT DUE 156.95

9E MELB VR3CL

PYRC

DATE TYPE NOTATIONS FU ACT USERID 1006 IMAT NEW SVC IN NF 904 448-6587 635 SHAR #NDVBMK 1006 IMAT NEW SVC IN NF 407 688-0876 648 SHAK #N74BKW 1006 IMAT NEW SVC IN NF 407 854-4955 106 SHAK #N6KPKT

1005 IMAT NEW SVC IN NF 904 731-5497 235 SHAK #N5K640 1005 IMAT NEW SVC IN NF 407 725-2333 544 SHAK #N51T57 1004 IMAT NEW SVC IN NF 407 727-3953 332 SHAK #NG8Q70 1004 IMAT NEW SVC IN NF 407 768-0404 111 SHAK #N4H1FM 1004 IMAT NEW SVC IN NF 904 634-0018 710 SHAK #N8H8MB

1005 IMAT NEW SVC IN NF 904 726-8277 776 SHAK #NF7ML4

1004 IMAT NEW SVC IN NF 904 398-9190 951 SHAK #N6G8NV

1004 IMAT NEW SVC IN NF 407 812-4707 436 SHAK #NFYGTW
1004 IMAT NEW SVC IN SE 561 286-4700 645 SHAK #N5B6L8
1004 IMAT NEW SVC IN NF 904 317-8306 484 SHAK #N6W8B2 1001 IMAT NEW SVC IN NF 904 781-0916 720 SHAK #NCHGMH

1001 IMAT NEW SVC IN NF 407 956-8445 286 SHAK #N4QC82 1001 IMAT NEW SVC IN NF 904 743-7344 334 SHAK #N4B694 1001 IMAT NEW SVC IN NF 407 984-2206 336 SHAK #N626JF 1001 IMAT NEW SVC IN NF 904 908-9355 390 SHAK #NG4167

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\*\*\* SQ20JRC1 \*\*\* SQ20JRC1 \*\*\* SQ20JRC1

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407 733 1459 393 \*MEM1\* SEP 28 1999 \*LIVE\* 9E MELB VR3CL NC DUP CUST EXISTS PYRC CC D MCC5 C3144 RICHARD AUSTIN PB 020 STA 70 TAX NNNN 206 VIN ROSE CIR SE RA 021 RTA 40 TAR 036702 TBE 0288 DOI 082098 FL 32909 RB 029 NT AVT 58 DEP

OF STATE \*CIV 0898 (BSUM) SS(1);N API FE P F8 2 RCM IC 3/0040 2/0055 P/0042 TRT 000007045040 RCK 000000000010 SS 219-88-3836 LB 2.49 BAL 0.00 CC 156.95 TOT 156.95 LP DATE TYPE NOTATIONS URB 22.90 DEN 134.05 FU ACT USERID 1007 IMAT NEW SVC IN NF 904 819-0089 787 SHAK #NOD9W9 \*\*\* SQ20JRC1 1007 IMAT NEW SVC IN SE 561 460-3883 631 SHAK #N1DW07 \*\*\* SQ20MFS1 1006 IMAT NEW SVC IN NF 407 737-7255 382 SHAK #N7458L \*\*\* SQ20JRC1 1006 IMAT NEW SVC IN NF 904 475-0034 150 SHAK #N1274H 1006 IMAT NEW SVC IN SE 561 464-8415 283 SHAK #N7YJ56 \*\*\* SQ20JRC1 \*\*\* SQ20MFS1 1006 IMAT NEW SVC IN NF 407 953-2171 005 SHAK #N59RF3 \*\*\* SQ20JRC1 \*\*\* SQ20JRC1 1006 IMAT NEW SVC IN NF 904 722-0006 685 SHAK #N0812D 1006 IMAT NEW SVC IN NF 904 766-0888 303 SHAK #N324RT 1006 IMAT NEW SVC IN NF 407 952-5792 582 SHAK #N2GBYR \*\*\* SQ20JRC1 \*\*\* SQ20JRC1