

Eric Fryson

From: James Minnes [minnes.j@gmail.com]
Sent: Tuesday, June 26, 2012 5:48 PM
To: Filings@psc.state.fl.us
Cc: Martin Friedman; Keino Young
Subject: docket no.110061-WS
Attachments: motion to compel.pdf

DIAMOND WILLIAMS

From: James Minnes (minnes.j@gmail .com) Sent: June 26, 2012

To: filings@psc.state.fl.us

cc. Martin Friedman, Keino Young

Subject: Re: 110061-WS electronic filing, James Minnes' Motion to Compel AUI Attachments:
Motion to Compel and Certificate of Service

Electronic Filing:

a) Person responsible for this electronic filing: James Minnes
25 Grovehurst Drive Ottawa, On
K2G 6W1

b) Docket No. 110061_WS

In Re: Application for Authority to Transfer the Assets of Service Management Systems Inc. and
Certificate Nos. 517-W and 450-S in Brevard County, Florida to Aquarina Utilities Inc.

c) Document being filed on behalf of James Minnes

d) There are a total of 2 pages attached

e) The document attached for electronic filing is James Minnes' Motion to Compel with
Certificate of Service attached

James Minnes

e-mail: minnes.j@gmail.com 819-671-6732

DOCUMENT NUMBER DATE

04246 JUN 27 09

6/27/2012

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for Authority to Transfer the Assets)
of Service Management Systems Inc., and)
Certificates Nos. 517-W and 450-S in Brevard)
County, Florida to Aquarina Utilities Inc.)

Docket No. 110061-WS

MOTION TO COMPEL AQUARINA UTILITIES INC.

James I. Minnes (the Objector) hereby moves to have Aquarina Utilities Inc. (AUI) compelled to produce the personal financial statement of Reginald Burge.

1. The Objector relies upon Rule 25-30.037(2)(k) F.A.C. on the basis of AUI's representation in document 06256-11, AUI's response to PSC staff's second deficiency letter, that Reginald Burge, the buyer of AUI, holds 100% of the ownership of AUI and shall provide 100% of the financing for AUI.
2. The Objector relies upon the express undertaking of AUI, stated unequivocally and unconditionally in document 01299-11, AUI's Application, that:
" The personal financial statement of the majority shareholders of the Buyer will be provided upon request".
3. No testimony or exhibits can be identified or filed by the Objector with the Commission nor can any meaningful discovery be conducted by the Objector of the Applicant, in the absence of the production of the said personal financial statement.
4. The Objector shall keep the personal financial statement confidential and sign a confidentiality agreement, if required.

All of which is respectfully submitted this 26th day of June, 2012.

s/James I. Minnes
25 Grovehurst Drive, Ottawa, On.
819-671-6732
minnes.j@gmail.com

DOCUMENT NUMBER DATE

04246 JUN 27 2012

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Certificate of Service

Docket No. 110061-WS

I HerebY Certify that a true copy of the foregoing Motion to Compel has been filed with the PSC Clerk and furnished to the following, electronically, this 26th day of June 2012.

Martin Friedman
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s/ James Minnes

James Minnes