

From: Todd E. DeFeudis <toddedefeudis@gmail.com>
Sent: Thursday, December 13, 2018 4:08 PM
To: Abbie Magrane (Services - 6)
Cc: Leora Price (Services - 6); Whit Sargent (GasInfrastructure - 5); Zach Pace (GasInfrastructure - 6)
Subject: [External] 12.13.2018 Pre-Verified Complaint Interrogatories by Todd E. DeFeudis, Consumer for Natural Gas Services of Dominion to be answered by Abbie Magrane, Senior Legal Counsel Dominion Energy and Agent for Dominion Energy.

Follow Up Flag: Follow up
Flag Status: Flagged

12.13.2018 Pre-Verified Complaint Interrogatories by Todd E. DeFeudis, Consumer for Natural Gas Services of Dominion to be answered by Abbie Magrane, Senior Legal Counsel Dominion Energy and Agent for Dominion Energy.

Abbie Magrane, Senior Attorney for Dominion Energy and Agent for Dominion Energy:

A. Please answer the following "pre-verified complaint" interrogatories?:

1. Do you think Dominion Energy or any of its agents have a valid and legal contract with Todd E. DeFeudis and Cristy DeFeudis for the property at 402 Aspen Road, Francis, UT 84036? such as a "service contract" and if so scan and email us a copy? (second request) of what you think represents a contract or agreement between the parties.

a) If you do think a contract exists, please email it to ToddEDeFeudis@gmail.com, third request.

2. Have Dominion Energy or any of its agents, affiliates or associates filed a record of having a service contract with Todd E. DeFeudis, Cristy DeFeudis and/or the property at 402 Aspen Road Francis, UT 84036 with the registry of deeds and/or at Dominion Energy internal database or record?

a) If a filing has been made, please email it to ToddEDeFeudis@gmail.com

3. Was the proposed "service contract" provided by Whit Sargent a legal contract complying with the local, state and federal laws?

4. Did the proposed "service contract" have any clauses that violated, local, state, or federal laws?

5. Did Whit Sargent or any of Dominion Energy's agents say or imply: "You either sign that 'service contract' or you will not get heat to heat that home"?

6. Did Dominion Energy its affiliates or associates mis-use its monopoly power to attempt to get either Todd E. DeFeudis or Cristy DeFeudis to sign an illegal "service contract" that violated local, state and federal laws?

7. Did Dominion Energy its affiliates or associates put illegal clauses in its proposed "service contract" designed to harass, intimidate, extort payments, or create an undue liability for proposed services?

Thank you for participating in these "pre-verified complaint" interrogatories.

Yours truly,

Todd E. DeFeudis

Todd E. DeFeudis, Real Estate Manager: RE:IMDB (Real Estate: Investment, Management, Development, and Brokerage.) CLICK HERE: for real-time-updated, apartment listings for rent https://docs.google.com/spreadsheets/d/1IUeZ4tVPOTbYAG78SeMArB_0XKtM5Zwe3RQZeS0ZmGE/edit#gid=0

ToddEDeFeudis@gmail.com (Please use this method of communication first, prioritize, and we prefer email for all business and real estate communications).

Home/Office [REDACTED], (We check our voice messages timely at this number)

Todd's Cell [REDACTED] (For emergency calls as a supplement, not a substitute for email communications);

Cristy's Cell [REDACTED], (For second method of emergency calls, as a supplement to email communications)

Mailing address:

(As a business policy, we do not sign for the receipt of mail. Please send all mail, regular mail or delivery confirmation, ***signature not required*** for receiving mail.). Todd E. DeFeudis, Real Estate Manager, 3534 E. Wasatch Grove Lane, Cottonwood Heights, UT 84121

Building site: The address of our latest building site is 402 Aspen Road, Francis, UT 84036, Lot C-18. The building site is easy to find: just South of the chapel for The Church of Jesus Christ of Latter Day Saints in Francis, UT 84036. Please email or text Todd's cell phone before delivery of materials there.

On Wed, Dec 12, 2018 at 7:48 PM Abbie Magrane <abbie.magrane@dominionenergy.com> wrote:

Dominion Energy's registered agent is CT Corporation System, 1108 E. South Union Ave., Midvale, UT 84047.

Abigail E. Magrane

Senior Counsel

Dominion Energy

333 South State Street

P.O. Box 45433

Salt Lake City, UT 84145-0433



Abbie.magrane@dominionenergy.com



From: Todd E. DeFeudis [mailto:toddedefeudis@gmail.com]
Sent: Wednesday, December 12, 2018 6:44 PM
To: Abbie Magrane (Services - 6)
Cc: Leora Price (Services - 6); Whit Sargent (GasInfrastructure - 5); Zach Pace (GasInfrastructure - 6)
Subject: Re: [External] 12.12.2018 LEGAL. FRAUD. ATTEMPTS AT EXTORTION. CLAIMING A CONTRACT EXISTS THAT DOES NOT. FAULTY CONSTRUCTION. UNAUTHORIZED CONSTRUCTION. Todd E. DeFeudis and Cristy DeFeudis v. Dominion Energy. Abbie Magrane, Personally, and Whit Sargent P

Ms. Abbie Magrane, Senior Legal Counsel:

1. Second request

a) Will you accept and receive the service of a legal complaint, "verified complaint" by a sheriff or other authorized person for a "verified complaint" for Abbie Magrane, Whit Sargent and Dominion Energy?

b) What address should we send the sheriff to complete the service of the complaint?

c) If not, what are the address for the three defendants?

Yours truly,

Todd E. DeFeudis

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On Wed, Dec 12, 2018 at 7:34 PM Abbie Magrane <abbie.magrane@dominionenergy.com> wrote:

Mr. DeFeudis:

Attached please find a letter in response to your claims. Thank you.

Abigail E. Magrane

Senior Counsel

Dominion Energy

333 South State Street

P.O. Box 45433

Salt Lake City, UT 84145-0433

[REDACTED]

Abbie.magrane@dominionenergy.com



From: Todd E. DeFeudis [mailto:toddedefeudis@gmail.com]
Sent: Wednesday, December 12, 2018 2:15 PM
To: Abbie Magrane (Services - 6)
Cc: Leora Price (Services - 6); Whit Sargent (GasInfrastructure - 5); Zach Pace (GasInfrastructure - 6)
Subject: [External] 12.12.2018 LEGAL. FRAUD. ATTEMPTS AT EXTORTION. CLAIMING A CONTRACT EXISTS THAT DOES NOT. FAULTY CONSTRUCTION. UNAUTHORIZED CONSTRUCTION. Todd E. DeFeudis and Cristy DeFeudis v. Dominion Energy. Abbie Magrane, Personally, and Whit Sargent Pe...

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Dear Ms. Abbie Magrane, Senior Legal Counsel for Dominion Energy:

A. We think you are attempting a crime of extortion against us based on a contract that was never agreed upon by us and by a proposed illegal contract; for wrong, faulty and unauthorized construction that Whit Sargent performed.

1. I have called you several times and requested you call me back. You refuse to answer your phone or call me back.

a) Please call me back?

2. We have asked you to provide a copy of any contract that you think you have that represents a valid agreement between us and you.

a) You have refused to provide us any such agreement because it does not exist.

b) Instead you refer to a proposed illegal contract which we did not agree to and instead disputed as illegal.

3. We never entered into a legal agreement with Dominion Energy as you claim in the letter stated below; instead we refused to agree to the proposed contract and disputed it, instead of agreeing to it-as it has outrageous terms and

conditions-such as "agreeing to hold Dominion Energy harmless for their work which we have no control over and no expertise in".

a) With the letter you wrote below in which you claim we have a contract you are required per law to provide us evidence of any such contact that you claim we agreed to.

b) We claim that we do not have a contract with you and do not have an agreement with you.

4. Ms. Abbie Magrane: Again, please provide us a copy of any contact that you think you have with us; or we claim we have a personal legal claim against you for making an unsupported claim against us and making references to agreements that do not exist.

5. Dominion Energy was requested to install gas service by Todd E. DeFeudis and Cristy DeFeudis

a) Dominion Energy proposed an illegal and outrageous contract for gas installation line service, so neither Todd E. DeFeudis and/or Cristy DeFeudis agreed to the proposed contract and instead they "disputed the proposed contract".

b) Though there was no contract, Dominion Energy and/or Whit Sargent performed construction on the DeFeudis' property and the installed a wrong sized gas line on the DeFeudis' property without the DeFeudis' proper consent.

c) Dominion Energy installed wrong sized equipment on the DeFeudis' property that could not service the DeFeudis' new home.

d) Dominion Energy, Abbie Magrane and Dominion Energy Agents are attempting to extort money from Todd and Cristy DeFeudis by making claims based on a proposed contract that was never agreed by both parties and a proposed contract that is not legal.

e) Todd E. DeFeudis and Cristy DeFeudis are due protection, intervention and economic relief per local, state and federal laws for civil and criminal penalties against Dominion Energy, Abbie Magrane and its agents.

Dated 12.12.2018

Yours truly,

Todd E. DeFeudis

Todd E. DeFeudis, Real Estate Manager: RE:IMDB (Real Estate: Investment, Management, Development, and Brokerage.) CLICK HERE: for real-time-updated, apartment listings for rent https://docs.google.com/spreadsheets/d/1lUEz4tVPOTbYAG78SeMArB_0XKtM5Zwe3RQZeS0ZmGE/edit#gid=0

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On Fri, Aug 17, 2018 at 4:05 PM Abbie Magrane <abbie.magrane@dominionenergy.com> wrote:

Good afternoon Mr. DeFeudis,

Please accept this response to the concerns you've raised while working with my paralegal Leora Price. I have reviewed your e-mails as well as the issue regarding additional costs to install a larger meter at the residence located at 402 Aspen Road, Wild Willow, Utah.

As Ms. Price outlined in her letter to you dated August 6, 2018, you submitted a request to Dominion Energy Utah (DEU) for new natural gas service at 402 Aspen Rd. Wild Willow, Utah. In that request, you indicated that you would be installing natural gas appliances in the home with natural gas usage estimated to be 289,000/btu. The City of Francis Utah inspected the residence and indicated that the load on the natural gas line was instead 545,000/btu which requires that a larger gas meter be installed by DEU.

The contract you entered into with "Questar Gas Company dba Dominion Energy Utah" (DEU) in October, 2017 states "2.(b) Customer agrees to pay, prior to the date of installation, any and all Construction Costs. Customer shall also pay any additional Construction Costs that may arise during installation, including but not limited to frost and/or rock trenching ("Additional Construction Costs") within 30 days of the Company invoice date. Any change to the length or

scope of the Facilities, whether due to the Customer request or company's determination, in its sole discretion, that the initial design must be modified, that result in increased Construction Costs shall also be included as Additional Construction Costs."

Since the City of Francis has indicated that a larger natural gas meter is necessary due to the load placed on the natural gas system by the appliances located inside the residence, DEU has no choice but to install a larger gas meter. The necessity of a larger gas meter due to the load placed on the system, is considered an "Additional Construction Cost," and the contract indicates that you are responsible for Additional Construction Costs, (namely \$604.00), and that payment in full must be received before the meter is installed. Therefore, once DEU is in receipt of payment of the additional costs, DEU will install the natural gas meter at the Aspen Road address. Should you have any questions, you may contact me, or Ms. Price, because she is the individual who is responsible for these types of claims. Thank you.

Sincerely,

AEM

Abigail E. Magrane

Senior Counsel

Dominion Energy

333 South State Street

P.O. Box 45433

Salt Lake City, UT 84145-0433



Abbie.magrane@dominionenergy.com



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