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ROGER CHANTEL,
AZ CORP COMMISSION
Complainant, DOCUMENT CONTROL

Case No.: DOCKET No. E-01750A-04-0929

vs.

REPOSE TO MOHAVE'S SUPPLEMENTAL
LEGAL AUTHORITY IN SUPPORT OF
ITS MOTION FOR SUMMARY JUDGMENT

MOHAVE ELECTRIC COOPERATIVE,
INC., Represented By Michael A.
Curtis and Larry K.Udall,
Respondent

The Complainants in this case submits their response to the supplemental legal authority they received in the third week of December of the year of 2005. The Respondent or the Respondent's representatives, Michael A. Curtis and Larry K. Udall, are requesting the Hearing Officer, Teena Woolfe, to issue an order under the law principles of res judicata. The points and authorities outlined in *Maricopa-Stanfield Irrigation & Drainage District v. Smith* CV-04-00385-SA only confirms and supports the Complainant's claims and legal filings regarding jurisdiction issues of the hearing officer and the limited jurisdiction in this case. This U.S. Supreme Court case starts with the lowest jurisdiction, which is the trial judge, and then moves all the way to the U.S. Supreme Court authority over the issue of preclusion. Even though the Respondents may have invoked the legal principles of res judicata, this case

1 truly supports the Complainant's claim of jurisdiction. The
2 Complainant would like to bring it to the Hearing Officer's
3 attention by requesting this Hearing Officer to take judicial
4 notice of the Complainant's 14TH AMENDMENT RIGHTS. Sometimes res
5 judicata may be invoked to bring about fairness of law, which is
6 an established principal in a number of laws, rules, regulations
7 and exist in a number of points and authorities. The issue of
8 fairness of the law exist in spiritual writing as well as in the
9 Full Faith and Credit Act, 28 U.S.C.. There has not been any
10 compiling evidence submitted to this Hearing Officer that (1)
11 the issue was litigated to a conclusion in a prior action, (2) the
12 issue of fact or law was necessary to the prior judgment. If
13 these conditions have not been met in their entirety, then there
14 are no legal grounds for a summary judgment. The Complainant has
15 submitted to the Respondent's representatives, Michael A. Curtis
16 and Larry K. Udall, a reasonable resolvement of the conflicts
17 that exist and that offer has been rejected. It should be
18 judicially noted that the Complainant has made every effort to
19 move this case toward positive law and is practicing doctrine of
20 fairness, and theories of law found in the Full Faith and Credit
21 Act, 28 U.S.C.. The *Maricopa-Stanfield Irrigation & Drainage*
22 *District v. Smith* clearly recognizes the citizens' rights
23 outlined in the United States Constitution. The Complainant
24 requests this Hearing Office to recognize the Complainant's
25 vested rights that exist in the 14th Amendment of the United

1 States Constitution. This case creates far greater authority and
2 support for the briefing that has been submitted in this hearing
3 process in favor of denying the summary judgment than it does
4 for granting a summary judgment.

5 It is general knowledge that these proceedings are at a cross
6 road and the Complainant prays that they will move forward into
7 positive law by granting the Motion to Issue a Procedural Order.
8 The Complainant hopes that these proceedings will not move into
9 the area of black law by granting a summary judgment.

10 It should be noted that the Complainant has no intentions to
11 cause harm or destruction to any individual or authority that
12 supports positive law. If an individual or an authority chooses
13 to use elements, concepts and ideals developed by the dark
14 forces, it should be noted that the individuals and authorities
15 make their own choices to follow or practice black law and their
16 choices are governed by laws of creation (known sometimes as
17 "Newton's Law") which states that they may experience
18 consequences of the choice they have made. Please note that the
19 consequences they may experience have not been created by the
20 Complainant or his relationship as a visionary with powers of
21 the light force.

22 The Complainant requests this Hearing Officer to move forward
23 with the issuance of the procedural order. I am including a
24 excerpt that was include in that motion.

1 **R14-2-207-A-1** requires Mohave Electric Cooperative to file with
2 the Arizona Corporation Commission any special conditions
3 governing line extensions.

4 **R14-2-207-A-1, "Line Extensions"**

- 5 1. Each utility shall file, in Docket Control, for Commission
6 approval, a line extension tariff which incorporates the
7 provisions of this rule and specifically defines the
8 conditions governing the line extensions.

8 **R14-2-207-A-4**

- 9 4. Where the utility requires an applicant to advance funds
10 for a line extension, the utility shall furnish the
11 applicant with a copy of the line extension tariff of the
12 appropriate utility prior to the applicant's acceptance of
13 the utility's extension agreement.

14 MEC is requiring the advancement of funds for special conditions
15 that they are imposing on Complainant. Therefore, by **LAW**, they
16 must supply a copy of the tariff that imposes these special
17 conditions. The Complainant has repeatedly requested a copy of
18 the tariffs that mention these special conditions and the date
19 they were approved by the Commission. It appears that the only
20 way the Complainant will receive a copy of the tariffs,
21 outlining these special conditions, is for the Administrative
22 Law Judge to issue a procedural order to the Respondent to
23 supply a copy of these approved tariffs.

24 The motion submitted by the Complainant is only for the tariffs.

25 The Hearing Officer may want to request a Copy of the Mohave
Board of Directors' approval of these special conditions that
the management is imposing. The Complainant suggested an amount
for a fine. With all of the new evidence and the actions of the
Mohave Management this fine may be too small. It appears that
Mohave has no willingness to resolve the issues in this case. It
is now in the hands of the employees of the Commission and the

1 Commissioners themselves as to whether they want to proceed in
2 accordance to positive law, of whether we address United State
3 Constitutional issues, jurisdictional issues and issues of black
4 law. Complainant requests this Hearing Officer and the Arizona
5 Corporation Commission to move forward to resolve the issues of
6 law and bring these conflicts to and end.
7 May God inspire all authorities to act in accordance to positive
8 law.

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10 Dated this 12th day of January,
11 2006

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13 Roger Chantel
14 Union
15 Carpenter/Visionary
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The original and thirteen (13) copies of the foregoing "RESPONSE TO MOHAVE'S SUPPLEMENTAL LEGAL AUTHORITY IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT" for Docket No. E-01750A-04-0929 was mailed through the United States Postal Service this 21st day of January, 2006 to:

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