

BEFORE THE TENNESSEE REGULATORY AUTHORITY AT  
NASHVILLE, TENNESSEE

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T.R.A. DOCKET ROOM  
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IN RE:

PETITION TO SHOW CAUSE WHY A CEASE AND  
DESIST ORDER AND CIVIL PENALTIES &  
SANCTIONS SHOULD NOT BE IMPOSED  
AGAINST LAUREL HILLS CONDOMINIUM  
PROPERTY OWNERS ASSOCIATION

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**PARTY STAFF'S 1<sup>ST</sup> DISCOVERY REQUESTS TO RESPONDENT**

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Comes now the Tennessee Regulatory Authority ("TRA" or "Authority") Staff Appointed as Party ("Party Staff") by and through counsel and issues Party Staff's First Discovery Requests to Respondent. For all discovery responses please identify the person providing the information, documentation, or other support for each request. Such identification should include the name, title, address, and telephone number.

1. State the ownership of Laurel Hills Condominium Property Owners Association as far as who owns what interest in the condominiums stating such ownership interest since January 1, 2000. If such interests in Laurel Hills Condominiums Property Owners Association are owned by any entity such as an LLC or a corporation state the ownership in such LLC or corporation until individuals are named as owners of each successive LLC or corporation. Further, state the names of directors, managing members, members, and managers of each of these entities at all times since these LLCs were initially created, giving the dates and names of such directors, officers, managing members, members, and managers throughout the existence of the LLCs or corporations. For individuals, state their names, addresses, and ownership interests held.

**ANSWER:**

2. Identify all joint ownership interests between Laurel Hills Condominiums Property Owners Association and Moy Toy, LLC since January 1, 2000. For any ownership interest owned by any entity such as an LLC or a corporation state the ownership in such LLC or corporation until individuals are named as owners of each successive LLC or corporation. Further, state the names of directors, managing members, members, and managers of each of these entities at all times since these LLCs were initially created, giving the dates and names of such directors, officers, managing members, members, and managers throughout the existence of the LLCs or corporations. For individuals, state their names, addresses, and ownership interests held.

**ANSWER:**

3. Identify all joint ownership interests between Laurel Hills Condominiums Property Owners Association and Old South Golf since January 1, 2000. For any ownership interest owned by any entity such as an LLC or a corporation state the ownership in such LLC or corporation until individuals are named as owners of each successive LLC or corporation. Further, state the names of directors, managing members, members, and managers of each of these entities at all times since these LLCs were initially created, giving the dates and names of such directors, officers, managing members, members, and managers throughout the existence of the LLCs or corporations. For individuals, state their names, addresses, and ownership interests held.

**ANSWER:**

4. Identify all joint ownership interests between Laurel Hills Condominiums Property Owners Association and Terra Mountain Holdings, LLC since January 1, 2000. For any ownership interest owned by any entity such as an LLC or a corporation state the ownership in such LLC or corporation until individuals are named as owners of each successive LLC or corporation. Further, state the names of directors, managing members, members, and managers of each of these entities at all times since these LLCs were initially created, giving the dates and names of such directors, officers, managing members, members, and managers throughout the existence of the LLCs or corporations. For individuals, state their names, addresses, and ownership interests held.

**ANSWER:**

5. Identify all joint ownership interests between Laurel Hills Condominiums Property Owners Association and J. L. Wucher Co., LLC since January 1, 2000. For any ownership interest owned by any entity such as an LLC or a corporation state the ownership in such LLC or corporation until individuals are named as owners of each successive LLC or corporation. Further, state the names of directors, managing members, members, and managers of each of these entities at all times since these LLCs were initially created, giving the dates and names of such directors, officers, managing members, members, and managers throughout the existence of the LLCs or corporations. For individuals, state their names, addresses, and ownership interests held.

**ANSWER:**

6. Identify all joint ownership interests between Laurel Hills Condominiums Property Owners Association and LKM Group, LLC since January 1, 2000. For any ownership interest owned by any entity such as an LLC or a corporation state the ownership in such LLC or corporation until individuals are named as owners of each successive LLC or corporation. Further, state the names of directors, managing members, members, and managers of each of these entities at all times since these LLCs were initially created, giving the dates and names of such directors, officers, managing members, members, and managers throughout the existence of the LLCs or corporations. For individuals, state their names, addresses, and ownership interests held.

**ANSWER:**

7. Identify all joint management interests between Laurel Hills Condominiums Property Owners Association and Moy Toy, LLC since January 1, 2000. Management interests include directors, managing members, members, managers, and anyone listed on a secretary of state filing or anyone else exercising control or oversight over either entity. Further, state the names, addresses, and position or management interest held.

**ANSWER:**

8. Identify all joint management interests between Laurel Hills Condominiums Property Owners Association and Old South Golf since January 1, 2000. Management interests include directors, managing members, members, managers, and anyone listed on a secretary of state filing or anyone else exercising control or oversight over either entity. Further, state the names, addresses, and position or management interest held.

**ANSWER:**

9. Identify all joint management interests between Laurel Hills Condominiums Property Owners Association and Terra Mountain Holdings, LLC since January 1, 2000. Management interests include directors, managing members, members, managers, and anyone listed on a secretary of state filing or anyone else exercising control or oversight over either entity. Further, state the names, addresses, and position or management interest held.

**ANSWER:**

10. Admit or deny that the road leading to water tower has barricaded in such a manner that a vehicle cannot access the water tower parcel by way of the road.

**ANSWER:**


11. Provide any and all evidence, available to any person identified in Questions 1, 2, or 9 above, that demonstrates that the conservation easement granted to Terra Mountain Holdings does not infringe upon the irrevocable license agreements granted to Laurel Hills Water System in Receivership.

**ANSWER:**

12. Provide documentation, available to any person identified in Questions 1 or 2 above, of all efforts by any party to transfer the rights to places a Cumberland County E-911 antenna on the water tower on Renegade Mountain.

**ANSWER:**

Respectfully submitted,




Shiva K. Bozarth, BPR No.22685  
Chief of Compliance  
Tennessee Regulatory Authority  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37243

## **CERTIFICATE OF SERVICE**

I certify that I have served a copy of the forgoing document on the following persons by depositing a copy of same in the U.S. Mail, postage prepaid, addressed to them at the addresses shown below:

Ben Gastel, Esq.  
Branstetter, Stranch, & Jennings  
223 Rosa Parks Boulevard, Suite 200  
Nashville, Tennessee 37203

This the 25<sup>th</sup> day of April 2016.

  
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Shiva K. Bozarth