

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

RECEIVED

2016 APR 27 PM 3:51

T.R.A. DOCKET ROOM

**IN RE:**

**ALLEGED VIOLATIONS OF  
THE STATUTES AND RULES  
REGULATING WATER UTILITIES  
BY MOYTOY, LLC**

)  
)  
) **DOCKET NO. 15-00118**  
)  
)  
)

---

**PARTY STAFF'S FIRST REQUEST FOR DISCOVERY**

---

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 Moy Toy, LLC as far as who owns what interest in the entity stating such ownership interest since January 1, 2000. If such interests in Moy Toy, LLC 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 Moy Toy, LLC 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 Moy Toy, LLC 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 Moy Toy, LLC 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 Moy Toy, LLC 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 Moy Toy, LLC 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 Moy Toy, LLC 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. Identify all joint management interests between Moy Toy, LLC and J. L. Wucher Co. 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:**

11. Identify all joint management interests between Moy Toy, LLC and LKM Group 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:**

12. State the date upon which Moy Toy, LLC purchased the Renegade Mountain water system including the land upon which the water system operated. Provide all documentary evidence to support this assertion.

**ANSWER:**

13. Identify the date upon which Old South Golf began operation of the water system. Provide all documentary evidence to support this assertion.

**ANSWER:**

14. Provide a copy of the contract or other authorization between Moy Toy, LLC and Old South Golf for Old South Golf to operate the water system on Renegade Mountain.

**ANSWER:**

15. Provide a copy of all bank records or other information that demonstrates that Laurel Hills Condominiums Property Owners Association made any payments on the note for the sale of the Renegade Mountain water system from Moy Toy, LLC.

**ANSWER:**

16. Provide a copy of all paperwork including court filings that demonstrate that Moy Toy, LLC foreclosed upon or otherwise seized control of the Renegade Mountain water tower and parcel of land from Laurel Hills Condominium Property Owners Association.

**ANSWER:**

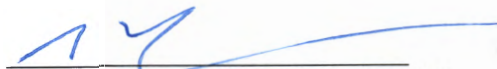
17. Provide all information and documentation that was used to value the Renegade Mountain water system when it was sold to Laurel Hills Condominiums Property Owners Association.

**ANSWER:**

18. Provide all insurance records for any property owned upon Renegade Mountain since January 1, 2000. Insurance records include: policies, copies of policies, billing statements, proof of insurance, etc.

**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:

Scott D. Hall  
105 Bruce Street  
Sevierville, Tennessee 37862

Vance Broemel  
Consumer Advocate and Protection Division  
P.O. Box 20207  
Nashville, Tennessee 37202

This the 28<sup>th</sup> day of April 2016.



---

Shiva K. Bozarth