

NC

FILE

10-1400-WS-CSS

2

COMPLAINT OF NSCO INTERNATIONAL INVESTMENT LLC  
AS  
AGAINST OHIO AMERICAN WATER

RECEIVED-DOCKETING DIV

2009 SEP 21 AM 11:09

PUCO

I, Richard D. Palmer, Attorney for the Complainant NSCO International Investment LLC dba Cross Key Row, 5020 Chatterton Rd. Apt #5, Columbus, Ohio 43232, (hereafter NSCO) make the following complaint as against Ohio American Water, PO Box 94551, Alton, IL 62002 and locally at 5481 Buenos Aires, Westerville, Ohio 43081 (hereinafter referred to as OHIO).

1. NSCO purchased the property referenced herein, an apartment complex, on November 18, 2009. On November 30, 2009 the Deed of this conveyance was recorded.
2. On or about November 19, 2009, agents of NSCO contacted OHIO to arrange for water services at this location.
3. Since that date there have been problems with the billing of this account. First OHIO failed to assign a new account to NSCO and instead maintained the account of the predecessor company. This was finally altered in 2010. However, the confusion of the accounts still continues.
4. In a current summary of accounts there is a reference to transfers from this old account. In addition, payments made by NSCO had been credited to the former account.
5. On other account statements, OHIO reports in excess of \$16000 in payments and an outstanding balance of in excess of \$60,000.00. All this is erroneous.
6. The meter reading done on this account results in charges for water usage 10 times the actual usage. No consideration to this issue has been given.
7. Beginning In August 2010, I began calling the collectors and asking for an accounting and a stay on shut off. They agreed to provide the same and stay for 30 days. Then when nothing came for over a week, I contacted them again and was advised that the Local branch cancelled this deal and the shut off actions began. I called the local branch and was told they would

This is to certify that the foregoing documents are an accurate and complete reproduction of a case file document delivered in the regular course of business  
Technician AW Date Processed 9/21/10

shut off unless in excess of \$26000 was paid forthwith and that the old account was still due. Never did this person agree to provide any accounting. In fact he would not commit to that at all.

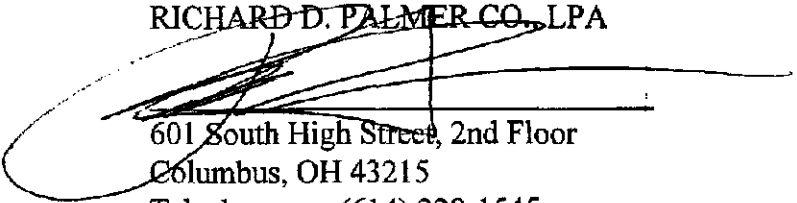
8. I then called the PUCO legal department and received significant assistance. It was arranged that the shutoff would be stopped, which it was, and that an accounting would be sent, which it has not been.

9. All billings are in dispute as there is belief that the charges are 10 times too high. However, NSCO will continue to pay what it believes is due each month during the pendency of this matter by means of checks from this Attorneys Trust account, with special notation and restriction.

10. NSCO requests that the issuance of a Stay be made as to OHIO during the pendency of this matter, including shut offs and the posting of notices of shutoff.

Respectfully submitted,

RICHARD D. PALMER CO., LPA



601 South High Street, 2nd Floor  
Columbus, OH 43215

Telephone: (614) 228-1545

Facsimile: (614) 221-2912

[rdpalmerlaw@aol.com](mailto:rdpalmerlaw@aol.com)

Attorney for NSCO International Investment, LLC