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The Public Utilities Commission of Ohio

14-0771-EL-AGG

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Date Received	Case Number	Version
	-EL-AGG	August 2004

## CERTIFICATION APPLICATION FOR AGGREGATORS/POWER BROKERS

Please print or type all required information. Identify all attachments with an exhibit label and title (Example: Exhibit A-5 Experience). All attachments should bear the legal name of the Applicant. Applicants should file completed applications and all related correspondence with the Public Utilities Commission of Ohio, Docketing Division; 180 East Broad Street, Columbus, Ohio 43215-3793.

**This PDF form is designed so that you may input information directly onto the form.  
You may also download the form, by saving it to your local disk, for later use.**

### A. APPLICANT INFORMATION

#### A-1 Applicant's legal name, address, telephone number and web site address

Legal Name Bradley R. Lewis  
Address 13900 Nicklaus Drive, Overland Park, KS 66223  
Telephone # (913) 498-8795 Web site address (if any) www.creativenergy.org

#### A-2 List name, address, telephone number and web site address under which Applicant will do business in Ohio

Legal Name Bradley R. Lewis  
Address 13900 Nicklaus Drive, Overland Park, KS 66223  
Telephone # (913) 498-8795 Web site address (if any) www.creativenergy.org

#### A-3 List all names under which the applicant does business in North America

Bradley R. Lewis dba CreativEnergy Options  
\_\_\_\_\_  
\_\_\_\_\_

#### A-4 Contact person for regulatory or emergency matters

Name Bradley R. Lewis  
Title Sole Proprietor

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
Technician ADJ Date Processed 4/25/14

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2014 APR 25 PM 2:26

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Business address 13900 Nicklaus Drive, Overland Park, KS 66223  
Telephone # (913) 498-8795 Fax # (866) 496-0230  
E-mail address (if any) brad.lewis@creativenergy.org

**A-5 Contact person for Commission Staff use in investigating customer complaints**

Name Bradely R. Lewis  
Title Sole Proprietor  
Business address 13900 Nicklaus Drive, Overland Park, KS 66223  
Telephone # (913) 498-8795 Fax # (866) 496-0230  
E-mail address (if any) brad.lewis@creativenergy.org

**A-6 Applicant's address and toll-free number for customer service and complaints**

Customer Service address 13900 Nicklaus Drive, Overland Park, KS 66223  
Toll-free Telephone # (877) 315-6858 Fax # (866) 496-0230  
E-mail address (if any) brad.lewis@creativenergy.org

**A-7 Applicant's federal employer identification number # 498563387**

**A-8 Applicant's form of ownership (check one)**

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Sole Proprietorship      | <input type="checkbox"/> Partnership                     |
| <input type="checkbox"/> Limited Liability Partnership (LLP) | <input type="checkbox"/> Limited Liability Company (LLC) |
| <input type="checkbox"/> Corporation                         | <input type="checkbox"/> Other _____                     |

**A-9 (Check all that apply) Identify each electric distribution utility certified territory in which the applicant intends to provide service, including identification of each customer class that the applicant intends to serve, for example, residential, small commercial, mercantile commercial, and industrial. (A mercantile customer, as defined in (A) (19) of Section 4928.01 of the Revised Code, is a commercial customer who consumes more than 700,000 kWh/year or is part of a national account in one or more states).**

- |   |                                      |  |  |  |
|---|--------------------------------------|--|--|--|
| <input checked="" type="checkbox"/> <b>First Energy</b>             |                                      |  |  |  |
| <input checked="" type="checkbox"/> Ohio Edison                     | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input checked="" type="checkbox"/> Toledo Edison                   | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input checked="" type="checkbox"/> Cleveland Electric Illuminating | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input checked="" type="checkbox"/> Cincinnati Gas & Electric       | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input checked="" type="checkbox"/> Monongahela Power               | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input checked="" type="checkbox"/> American Electric Power         |                                      |  |  |  |
| <input checked="" type="checkbox"/> Ohio Power                      | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input checked="" type="checkbox"/> Columbus Southern Power         | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input checked="" type="checkbox"/> Dayton Power and Light          | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |

**A-10** Provide the approximate start date that the applicant proposes to begin delivering services

June 1, 2014

**PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:**

- A-11** **Exhibit A-11 "Principal Officers, Directors & Partners"** provide the names, titles, addresses and telephone numbers of the applicant's principal officers, directors, partners, or other similar officials.
- A-12** **Exhibit A-12 "Corporate Structure,"** provide a description of the applicant's corporate structure, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale electricity or natural gas to customers and companies that aggregate customers in North America.
- A-13** **Exhibit A-13 "Company History,"** provide a concise description of the applicant's company history and principal business interests.
- A-14** **Exhibit A-14 "Articles of Incorporation and Bylaws,"** if applicable, provide the articles of incorporation filed with the state or jurisdiction in which the Applicant is incorporated and any amendments thereto.
- A-15** **Exhibit A-15 "Secretary of State,"** provide evidence that the applicant has registered with the Ohio Secretary of the State.

**B. APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE**

**PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:**

- B-1** **Exhibit B-1 "Jurisdictions of Operation,"** provide a list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered, or otherwise authorized to provide retail or wholesale electric services including aggregation services.
- B-2** **Exhibit B-2 "Experience & Plans,"** provide a description of the applicant's experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints in accordance with Commission rules adopted pursuant to Section 4928.10 of the Revised Code.

- B-3** **Exhibit B-3 "Summary of Experience,"** provide a concise summary of the applicant's experience in providing aggregation service(s) including contracting with customers to combine electric load and representing customers in the purchase of retail electric services. (e.g. number and types of customers served, utility service areas, amount of load, etc.).
- B-4** **Exhibit B-4 "Disclosure of Liabilities and Investigations,"** provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocation of authority, regulatory investigations, or any other matter that could adversely impact the applicant's financial or operational status or ability to provide the services it is seeking to be certified to provide.
- B-5** Disclose whether the applicant, a predecessor of the applicant, or any principal officer of the applicant have ever been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years.  
☒ No      ☐ Yes
- If yes, provide a separate attachment labeled as **Exhibit B-5 "Disclosure of Consumer Protection Violations"** detailing such violation(s) and providing all relevant documents.
- B-6** Disclose whether the applicant or a predecessor of the applicant has had any certification, license, or application to provide retail or wholesale electric service including aggregation service denied, curtailed, suspended, revoked, or cancelled within the past two years.  
☒ No      ☐ Yes
- If yes, provide a separate attachment labeled as **Exhibit B-6 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation"** detailing such action(s) and providing all relevant documents.

## **C. APPLICANT FINANCIAL CAPABILITY AND EXPERIENCE**

**PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:**

- C-1** **Exhibit C-1 "Annual Reports,"** provide the two most recent Annual Reports to Shareholders. If applicant does not have annual reports, the applicant should provide similar information in Exhibit C-1 or indicate that Exhibit C-1 is not applicable and why.
- C-2** **Exhibit C-2 "SEC Filings,"** provide the most recent 10-K/8-K Filings with the SEC. If applicant does not have such filings, it may submit those of its parent company. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 that the applicant is not required to file with the SEC and why.

- C-3 Exhibit C-3 “Financial Statements,”** provide copies of the applicant’s two most recent years of audited financial statements (balance sheet, income statement, and cash flow statement). If audited financial statements are not available, provide officer certified financial statements. If the applicant has not been in business long enough to satisfy this requirement, it shall file audited or officer certified financial statements covering the life of the business.
- C-4 Exhibit C-4 “Financial Arrangements,”** provide copies of the applicant’s financial arrangements to conduct CRES as a business activity (e.g., guarantees, bank commitments, contractual arrangements, credit agreements, etc.,).
- C-5 Exhibit C-5 “Forecasted Financial Statements,”** provide two years of forecasted financial statements (balance sheet, income statement, and cash flow statement) for the applicant’s CRES operation, along with a list of assumptions, and the name, address, e-mail address, and telephone number of the preparer.
- C-6 Exhibit C-6 “Credit Rating,”** provide a statement disclosing the applicant’s credit rating as reported by two of the following organizations: Duff & Phelps, Dun and Bradstreet Information Services, Fitch IBCA, Moody’s Investors Service, Standard & Poors, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or affiliate organization, provided the applicant submits a statement signed by a principal officer of the applicant’s parent or affiliate organization that guarantees the obligations of the applicant.
- C-7 Exhibit C-7 “Credit Report,”** provide a copy of the applicant’s credit report from Experian, Dun and Bradstreet or a similar organization.
- C-8 Exhibit C-8 “Bankruptcy Information,”** provide a list and description of any reorganizations, protection from creditors or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or within the two most recent years preceding the application.

C-9 **Exhibit C-9 "Merger Information,"** provide a statement describing any dissolution or merger or acquisition of the applicant within the five most recent years preceding the application.

Bruce K. Lee | Solo Proprietor  
Signature of Applicant & Title

Sworn and subscribed before me this 19 day of April, 2014  
Month Year

Jessica Keim  
Signature of official administering oath

Jessica Keim Teller Operations Supervisor  
Print Name and Title

My commission expires on April 4, 2017



# **AFFIDAVIT**

State of Kansas :

Overland Park  
(Town)

County of Johnson :

Bradley R. Lewis, Affiant, being duly sworn/affirmed according to law, deposes and says that:

He/She is the \_\_\_\_\_ (Office of Affiant) of Bradley R. Lewis (Name of Applicant);

That he/she is authorized to and does make this affidavit for said Applicant,

1. The Applicant herein, attests under penalty of false statement that all statements made in the application for certification are true and complete and that it will amend its application while the application is pending if any substantial changes occur regarding the information provided in the application.
2. The Applicant herein, attests it will timely file an annual report with the Public Utilities Commission of Ohio of its intrastate gross receipts, gross earnings, and sales of kilowatt-hours of electricity pursuant to Division (A) of Section 4905.10, Division (A) of Section 4911.18, and Division (F) of Section 4928.06 of the Revised Code.
3. The Applicant herein, attests that it will timely pay any assessments made pursuant to Sections 4905.10, 4911.18, or Division F of Section 4928.06 of the Revised Code.
4. The Applicant herein, attests that it will comply with all Public Utilities Commission of Ohio rules or orders as adopted pursuant to Chapter 4928 of the Revised Code.
5. The Applicant herein, attests that it will cooperate fully with the Public Utilities Commission of Ohio, and its Staff on any utility matter including the investigation of any consumer complaint regarding any service offered or provided by the Applicant.
6. The Applicant herein, attests that it will fully comply with Section 4928.09 of the Revised Code regarding consent to the jurisdiction of Ohio Courts and the service of process.
7. The Applicant herein, attests that it will comply with all state and/or federal rules and regulations concerning consumer protection, the environment, and advertising/promotions.
8. The Applicant herein, attests that it will use its best efforts to verify that any entity with whom it has a contractual relationship to purchase power is in compliance with all applicable licensing requirements of the Federal Energy Regulatory Commission and the Public Utilities Commission of Ohio.
9. The Applicant herein, attests that it will cooperate fully with the Public Utilities Commission of Ohio, the electric distribution companies, the regional transmission entities, and other electric suppliers in the event of an emergency condition that may jeopardize the safety and reliability of the electric service in accordance with the emergency plans and other procedures as may be determined appropriate by the Commission.
10. If applicable to the service(s) the Applicant will provide, the Applicant herein, attests that it will adhere to the reliability standards of (1) the North American Electric Reliability Council (NERC), (2) the appropriate regional reliability council(s), and (3) the Public Utilities Commission of Ohio. (Only applicable if pertains to the services the Applicant is offering)

11. The Applicant herein, attests that it will inform the Commission of any material change to the information supplied in the application within 30 days of such material change, including any change in contact person for regulatory purposes or contact person for Staff use in investigating customer complaints.

That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief and that he/she expects said Applicant to be able to prove the same at any hearing hereof.

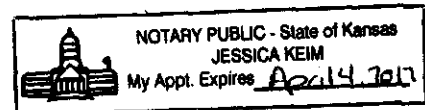
Daryl R. Davis / Solo Proprietor  
Signature of Affiant & Title

Sworn and subscribed before me this 19 day of April, 2014  
Month Year

Jessica Keim  
Signature of official administering oath

Jessica Keim Teller Operations Supervisor  
Print Name and Title

My commission expires on April 4, 2017





## Exhibit A-11

**"Principal Officers, Directors & Partners"** provide the names, titles, addresses and telephone numbers of the applicant's principal officers, directors, partners, or other similar officials.

Response:

Sole Proprietor –

Bradley R. Lewis  
13900 Nicklaus Drive  
Overland Park, KS 66223

Phone: 913-498-8795  
Fax: 866-496-0230

## Corporate Structure

### Exhibit A-12

**Exhibit A-12 "Corporate Structure,"** provide a description of the applicant's corporate structure, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale electricity or natural gas to customers and companies that aggregate customers in North America.

Response

Not applicable

# Company History

## Exhibit A-13

**"Company History,"** provide a concise description of the applicant's company history and principal business interests.

### Response:

CreativEnergy Options was created in 1999 to assist multi-site commercial customers in managing their utility expenses. CreativEnergy Options was formed in direct response to the increasingly deregulated energy markets. Our goal is to provide essential utility cost management services to customers who operate in many different utility territories and state jurisdictions. Independent of all utilities and energy suppliers, CreativEnergy Options provides an objective and unbiased outsource service for commercial customers.

We serve as an outsourced utility cost manager for several national account customers including Applebee's Restaurants, Extended Stay Hotels, AMC Theatres, and Denny's. We are not primarily responsible for how or how much energy they consume, just how much they pay for it. Services include energy procurement, energy auditing, rate analysis, benchmarking, budgeting, and regulatory updates.

Customers typically have a wide range of responsibility, have limited corporate resources, and are trying to serve as a 1-person energy department in their spare time. Outsourcing the utility cost management function makes sense for many of these individuals because it frees up valuable resources to focus on higher value internal utility management opportunities.

CreativEnergy Options runs a little differently than the typical "Consulting Firm". First, we make every attempt to operate more as a part time low-overhead employee than as consultants. Nothing involving utility expenses is "out of scope" and we are available to immediately respond to customer needs at any time.

CreativEnergy Options fixed fee pricing structure is designed to be more cost-effective than managing the function internally and funded by direct energy savings. This pricing structure allows our customers to share the costs of the learning curve associated with entering new and evolving local markets. Operating as a virtual employee prohibits us from accepting fees or commissions from marketers when negotiating contracts.

# Articles of Incorporation and Bylaws

## Exhibit A-14

**"Articles of Incorporation and Bylaws,"** if applicable, provide the articles of incorporation filed with the state or jurisdiction in which the Applicant is incorporated and any amendments thereto.

**Response:**

**Not applicable**

## Secretary of State

### Exhibit A-15

**"Secretary of State,"** provide evidence that the applicant has registered with the Ohio Secretary of the State.

Response:

See attached Certificate



DATE:	DOCUMENT ID	DESCRIPTION	FILING	EXPED	PENALTY	CERT	COPY
06/13/2011	201116100619	TRADE NAME/ORIGINAL FILING (RNO)	50.00	.00	.00	.00	.00

### Receipt

This is not a bill. Please do not remit payment.

BRADLEY LEWIS  
11524 HEMLOCK ST.  
OVERLAND PARK, KS 66210

# STATE OF OHIO CERTIFICATE

Ohio Secretary of State, Jon Husted

2027234

It is hereby certified that the Secretary of State of Ohio has custody of the business records for

**BRADLEY R. LEWIS**

and, that said business records show the filing and recording of:

Document(s)

**TRADE NAME/ORIGINAL FILING**

Date of First Use: 01/01/2000  
Expiration Date: 06/10/2016

Document No(s):

**201116100619**

BRADLEY R. LEWIS  
11524 HEMLOCK ST.  
OVERLAND PARK, KS 66210



United States of America  
State of Ohio  
Office of the Secretary of State

Witness my hand and the seal of  
the Secretary of State at Columbus,  
Ohio this 10th day of June, A.D.  
2011.

*Jon Husted*

Ohio Secretary of State

# Jurisdictions of Operations

## Exhibit B-1

**“Jurisdictions of Operation,”** provide a list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered, or otherwise authorized to provide retail or wholesale electric services including aggregation services.

Response:

Approved Broker License in:

Illinois	10-0104
Maine	2012-145
Maryland	IR -1528
Massachusetts	EB-118
New Hampshire	DM 12-312
New Jersey	EA-0200
Pennsylvania	A-2010-2186267

## Experience & Plans

### Exhibit B-2

**B-2 "Experience & Plans,"** provide a description of the applicant's experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints in accordance with Commission rules adopted pursuant to Section 4928.10 of the Revised Code.

**Response:**

Currently assisting several national account customers manage their utility expenses.

Customers which are assisted nationwide include Applebee's Restaurants, Burger King, Denny's, Extended Stay Hotels, and AMC Theatres. Annual utility spend for current customers exceeds \$600 million.

Key deregulated electric markets where assistance is provided include California, Texas, Illinois, New York, New Jersey, Pennsylvania, Maryland, and Massachusetts. Current role up till now has been as a contract employee. Now am looking to acquire a broker's license and work as an agent in these competitive markets.

Thirteen years of experience as a rate and public policy consultant to the electric and gas utility industry. An additional ten years of hands-on executive level operating and financial experience working for a major investor owned utility.

All billing will be through the marketers as no customers will be billed through CreativEnergy directly. Any customer questions or inquiries will be managed through e-mail and phone including a toll free number 877-315-6858.



# Summary of Experience

## Exhibit B-3

**"Summary of Experience,"** provide a concise summary of the applicant's experience in providing aggregation service(s) including contracting with customers to combine electric load and representing customers in the purchase of retail electric services. (e.g. number and types of customers served, utility service areas, amount of load, etc.).

### Response:

Currently assisting several national account customers manage their utility expenses. Customers which are assisted nationwide include Applebee's Restaurants, Burger King, Denny's, Extended Stay Hotels, and AMC Theatres. Annual utility spend for current customers exceeds \$600 million.

Key deregulated electric markets where assistance is provided include California, Texas, Illinois, New York, Pennsylvania, Maryland, and Massachusetts. Current role up till now has been as a contract employee. Now am looking to acquire a brokers license and work as an agent in these competitive markets.

Thirteen years of experience as a rate and public policy consultant to the electric and gas utility industry. An additional ten years of hands-on executive level operating and financial experience working for a major investor owned utility.

Areas of responsibilities and listing of key projects include the following:

- Utility Vice President of Rates, Finance, Sales, and Marketing
- Utility CFO responsible for financial management, billing, and accounts payable
- National Commercial Rate Expert
- Executive Level Utility Negotiator
- Launch of EnergyOne Competitive Retail Energy Strategy
- Energy restructuring presentations at numerous conferences and legislative reviews
- Launch of competitive retail energy competition in Pennsylvania
- Consulting engagements for over 100 electric and gas utilities
- Managed 30,000 customer commercial account base

### Summary of Work History

UtiliCorp (1989-1998) - Accountable for marketing, sales, IT, community affairs, economic development, and regulatory affairs. At EnergyOne, responsible for development of competitive retail energy strategy, franchise sales, sizing of competitive energy markets, and implementation in emerging deregulated markets.

## Summary of Experience

### Exhibit B-3 (continued)

Hagler Bailly (1988) - Senior consultant responsible for developing and managing regulatory and energy efficiency engagements for utility clients. Recruited from consulting firm by UtiliCorp to manage corporate regulatory affairs.

LMSL, Senior Utility Partner (1978-1987) - Senior Utility Partner in a regulatory and management consulting firm. Presented expert rate testimony in over 20 state and federal jurisdictions on behalf of 100 electric and gas utilities. Responsible for business development, sales, regulatory projects, general rate cases, management audits, construction audits, merger applications and reviews, rate design reviews, and fuel procurement audits.

#### **Education**

Bachelors Degree in Accounting from the University of Missouri

Masters Degree in Economics from the University of Missouri

Certified Public Accountant

## Disclosure of Liabilities and Investigations

### Exhibit B-4

**"Disclosure of Liabilities and Investigations,"** provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocation of authority, regulatory investigations, or any other matter that could adversely impact the applicant's financial or operational status or ability to provide the services it is seeking to be certified to provide.

Response: None

## Disclosure of Convictions

### Exhibit B-5

Disclose whether the applicant, a predecessor of the applicant, or any principal officer of the applicant have ever been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years.

☒ No ☐ Yes

Response: No

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# Annual Reports

## Exhibit C-1

“Annual Reports,” provide the two most recent Annual Reports to Shareholders. If applicant does not have annual reports, the applicant should provide similar information in Exhibit C-1 or indicate that Exhibit C-1 is not applicable and why.

Response:

As a Sole Proprietor I do not have an annual report. Below I have shown the last two years of income statement.

### CreativEnergy Options - Sole Proprietorship Bradley R. Lewis Income Statement - Cash Basis

Year	<u>2012</u>	<u>2013</u>
<u>Income</u>		
Gross Receipts	\$810,585	\$669,508
<u>Expenses</u>		
Legal and professional Services	\$231,958	\$254,733
Office Expenses	\$2,340	\$1,885
Supplies	\$1,414	\$1,724
Commissions and Fees	\$180,508	\$104,146
Travel Expenses	\$9,270	\$13,511
Meals and Entertainment	\$1,724	\$886
Utilities	\$9,535	\$9,324
Total Expenses	<u>\$434,409</u>	<u>\$386,209</u>
Net profit	<u>\$376,176</u>	<u>\$283,299</u>

## SEC Filing

### Exhibit C-2

**“SEC Filings,”** provide the most recent 10-K/8-K Filings with the SEC. If applicant does not have such filings, it may submit those of its parent company. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 that the applicant is not required to file with the SEC and why.

#### Response:

As a Sole Proprietor I do not make any SEC filings.

## Financial Statements

### Exhibit C-3

**“Financial Statements,”** provide copies of the applicant’s two most recent years of audited financial statements (balance sheet, income statement, and cash flow statement). If audited financial statements are not available, provide officer certified financial statements. If the applicant has not been in business long enough to satisfy this requirement, it shall file audited or officer certified financial statements covering the life of the business.

Response:

See Income Statements on Exhibit C-1.



## Financial Arrangements

### Exhibit C-4

**“Financial Arrangements,”** provide copies of the applicant's financial arrangements to conduct CRES as a business activity (e.g., guarantees, bank commitments, contractual arrangements, credit agreements, etc.,).

Response:

No arrangements in place

## Forecasted Financial Statements

### Exhibit C-5

**“Forecasted Financial Statements,”** provide two years of forecasted financial statements (balance sheet, income statement, and cash flow statement) for the applicant’s CRES operation, along with a list of assumptions, and the name, address, email address, and telephone number of the preparer.

#### Response:

Expect no significant changes to the 2009 and 2010 income statements shown on Exhibit C-1.

Brad Lewis - preparer

## Credit Rating

### Exhibit C-6

**“Credit Rating,”** provide a statement disclosing the applicant’s credit rating as reported by two of the following organizations: Duff & Phelps, Dun and Bradstreet Information Services, Fitch IBCA, Moody’s Investors Service, Standard & Poors, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or affiliate organization, provided the applicant submits a statement signed by a principal officer of the applicant’s parent or affiliate organization that guarantees the obligations of the applicant.

Response:

Sole Proprietor – no Credit Rating

## Credit Report

### Exhibit C-7

“Credit Report,” provide a copy of the applicant’s credit report from Experian, Dun and Bradstreet or a similar organization.

Response: As a sole proprietor do no have a credit report on this business.

## Bankruptcy Information

### Exhibit C-8

**“Bankruptcy Information,”** provide a list and description of any reorganizations, protection from creditors or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or within the two most recent years preceding the application.

Response: None

## Merger Information

### Exhibit C-9

**“Merger Information,”** provide a statement describing any dissolution or merger or acquisition of the applicant within the five most recent years preceding the application.

Response: None