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PUBLIC SERVICE COMMISSION

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

COMPLAINT OF MICHAEL HEMPHILL VS. SOUTH EASTERN WATER ASSOCIATION, INC. (CASE NO. 2026-00191)

ELECTRONIC APPLICATION OF SOUTH EASTERN WATER ASSOCIATION, INC. FOR A GENERAL ADJUSTMENT OF RATES (CASE NO. 2026-00233)

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# COMPLAINANT'S SUPPLEMENTAL LEGISLATION DISCOVERY PROPOSAL

**FORMAL INTERROGATORY / PRODUCTION REQUEST: QUESTION NO. 26**

## BACKGROUND CONTEXT AND FINANCIAL FOUNDATION:

The Complainant has established on the active state dockets that South Eastern Water Association is utilizing a **.91-acre physical infrastructure footprint** situated at the premium maximum-elevation coordinates of Complainant's private farm to serve as the critical gravity engine for its regional distribution network. According to the Utility's own multi-decade administrative entries spanning four consecutive rate hikes, this specific high-elevation deployment directly transports and regulates **at least 20% of the Utility's total daily regional water volume**, feeding a network of **at least 700 downstream meters**.

The official filings and property records from the Clerk of Courts further confirm that this infrastructure has generated a documented cumulative total of **$5.44 million in untaxed, unjust enrichment** off Complainant's land out of **$59 million in total historical utility revenues**. This entire deployment has been maintained under a fraudulent asset valuation path originating from the Charlie Hurst transaction—where the Utility swore to federal funding agencies (USDA Rural Development) that it expended $10,000 for infrastructure acquisition, when court deeds establish a true execution cost of only $2,500.

Despite generating millions tax-free under its 501(c)(12) cooperative status off Complainant's property, the Utility has systematically suppressed Complainant's valid 2005, 2024, and September 19, 2025 agricultural tax exemptions, while deploying an unauthorized third meter 50+ feet deep onto private property via a felony cut-and-paste alteration of Complainant's signature block to evade regulatory and criminal oversight.

## FORMAL DISCOVERY REQUEST NO. 26:

**QUESTION 26:** Mandate that Defendant (South Eastern Water Association, Inc.) and its corporate legal counsel (Stoll Keenon Ogden PLLC and Managing Director P. Douglas Barr) produce the exact, verified statutory remedy, recorded legal instrument, or non-fraudulent property easement that authorizes a tax-exempt 501(c)(12) corporation to extract and realize **$5.44 million in compounding revenue** from a continuous 20-year physical daily infrastructure trespass across Complainant's private property without executing lawful compensation or possessing real landowner verification.

Submitted electronically this 17th day of October, 2026.

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**Michael Hemphill, Complainant Pro Se**

72.5-Acre Registered Agricultural Property Owner

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