

June 10, 2014

Washington Utilities and Transportation Commission  
PO Box 47250  
Olympia, WA 98504-7250  
Re: Locus Telecommunications, Inc. (UBI No. 602-083-951)  
Application for Mitigation / Penalty Assessment: UT-140898

2014 JUN 11 AM 9:29

To Whom It May Concern,

We would like to respectfully request a mitigation of the application of the above referenced penalty for following reasons:

1. The rejected filing was submitted within the allotted timeframe, as evidenced by the attached showing confirmation of receipt by your staff at 9:20am on 05/01/14 (see attached).
2. The filing was rejected because we mistakenly failed to provide unredacted versions of our "financials." This was a good faith mistake that we remedied the same day that we reviewed your mail notification by e-mailing the inadvertently omitted documents to Amy Andrews of your staff (see attached email confirmation from Mrs. Andrews).
3. We have duly noted our omission and will not make the same mistake in future filings.

Thank you in advance for your time and consideration.

Regards,

  
Ricardo Barreras | Sr. Manager - Compliance & Regulatory | Risk Management  
Office: 201-585-3681 | Fax: 201-947-6100  
Email: [ricardo@locus.net](mailto:ricardo@locus.net)

Encl.

LOCUS TELECOMMUNICATIONS, INC.

Headquarters

2200 Fletcher Avenue 6th Floor  
Fort Lee, NJ 07024

Main: 201-585-3600  
Fax: 201-947-6108

[www.locustelecom.com](http://www.locustelecom.com)

Los Angeles Offices

11761 Telegraph Road  
Santa Fe Springs, CA 90670

Main: 562-942-2420  
Fax: 562-949-8248

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

PENALTY ASSESSMENT UT-140898

PLEASE NOTE: You must complete and sign this document, and send it to the Commission within 15 days after you receive the penalty assessment. Use additional paper if needed.

I have read and understand RCW 9A.72.020 (printed below), which states that making false statements under oath is a class B felony. I am over the age of 18, am competent to testify to the matters set forth below and I have personal knowledge of those matters. I hereby make, under oath, the following statements.

[ ] 1. Payment of penalty. I admit that the violations occurred. I have:

[ ] Enclosed \$ \_\_\_\_\_ in payment of the penalty

[ ] Submitted my payment of \$ \_\_\_\_\_ online at www.utc.wa.gov. My confirmation number is \_\_\_\_\_.

[ ] 2. Request for a hearing. I believe that one or more of the alleged violations did not occur, for the reasons I describe below, and I request a hearing based on those reasons for a decision by an administrative law judge:

[ ] 3. Application for mitigation. I admit the violations, but I believe that the penalty should be reduced for the reasons set out below:

*RB* → \*PLEASE SEE ATTACHED *RB*

[ ] a) I ask for a hearing to present evidence on the information I provide above to an administrative law judge for a decision

OR  b) I ask for a Commission decision based solely on the information I provide above.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing, including information I have presented on any attachments, is true and correct.

Dated: 6/5/14 [month/day/year], at FORT LEE, NJ 07024 [city, state]

LOCUS TELECOMMUNICATIONS, INC.  
Name of Respondent (company) – please print

*[Signature]*  
Signature of Applicant  
RICARDO BARRERAS

RCW 9A.72.020:

“Perjury in the first degree. (1) A person is guilty of perjury in the first degree if in any official proceeding he makes a materially false statement which he knows to be false under an oath required or authorized by law. (2) Knowledge of the materiality of the statement is not an element of this crime, and the actor’s mistaken belief that his statement was not material is not a defense to a prosecution under this section. (3) Perjury in the first degree is a class B felony.”

2014 JUN 11 AM 9:30

**Ricardo Barreras**

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**From:** trackingupdates@fedex.com  
**Sent:** Monday, April 28, 2014 4:24 PM  
**To:** ricardo@locus.net  
**Subject:** FedEx Shipment Notification

**COPY**  
(K)

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This tracking update has been requested by:

Company Name: Locus Telecommunications  
Name: Corporate Headquarters  
E-mail: [ricardo@locus.net](mailto:ricardo@locus.net)

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Sent to: [ricardo@locus.net](mailto:ricardo@locus.net)

Corporate Headquarters of Locus Telecommunications sent Rae Lynn Carnes of Washi Utilities & Transp Commission 1 FedEx 2Day A.M package(s).

This shipment is scheduled to be sent on 04/28/2014.

Reference information includes:

Reference: Ricardo B  
Special handling/Services: Deliver Weekday  
Status: Shipment information sent to FedEx  
Tracking number: [798682505191](https://www.fedex.com/track/798682505191)

2014 JUN 11 AM 9:31

To track the latest status of your shipment, click on the tracking number above, or visit us at [fedex.com](http://fedex.com).

To learn more about FedEx Express, please visit our website at [fedex.com](http://fedex.com).

This tracking update has been sent to you by FedEx on the behalf of the Requestor noted above. FedEx does not validate the authenticity of the requestor and does not validate, guarantee or warrant the authenticity of the request, the requestor's message, or the accuracy of this tracking update. For tracking results and fedex.com's terms of use, go to [fedex.com](http://fedex.com).

Thank you for your business.

**Track a Shipment**

798682505191

Save tracking results

Help

Enter up to 30 FedEx tracking, door tag or FedEx Office order numbers(one per line).

Track

**My Shipments**

0  
0  
0

Track and save tracking results for your next visit to fedex.com

Ship (P/U) date :  
Tues 4/29/2014 4:35 pm  
Fort Lee, NJ  
US



Delivered  
Signed for by: K.HANCOCK  
Actual delivery :  
Thur 5/01/2014 9:20 am  
OLYMPIA, WA  
US

**Delivery Options**

This shipment's delivery has been customized by the recipient. Login or Signup for delivery options to edit or cancel the settings. This shipment's delivery has been customized by the recipient. Signup for delivery options to edit or cancel the settings. This shipment's delivery has been customized by the recipient. Add this address to My Profile to edit or cancel the settings. Renew your enrollment to view details or edit this delivery option.

Travel History

Date/Time	Activity	Location
5/01/2014 - Thursday		
9:20 am	Delivered	OLYMPIA, WA
8:40 am	On FedEx vehicle for delivery	OLYMPIA, WA
8:31 am	Delivery exception Incorrect address	OLYMPIA, WA
8:31 am	Delivery exception Incorrect address	OLYMPIA, WA
8:04 am	At local FedEx facility	OLYMPIA, WA
5:38 am	At destination sort facility	SEATTLE, WA
3:44 am	Departed FedEx location	MEMPHIS, TN
4/30/2014 - Wednesday		
9:26 am	Arrived at FedEx location	MEMPHIS, TN
8:03 am	Departed FedEx location	NEWARK, NJ
4/29/2014 - Tuesday		
8:46 pm	Arrived at FedEx location	NEWARK, NJ
8:13 pm	Left FedEx origin facility	MOONACHIE, NJ
4:35 pm	Picked up	MOONACHIE, NJ
4/28/2014 - Monday		
3:20 pm	Shipment information sent to FedEx	

Local Scan Time

Shipment Facts

Tracking number 798682505191  
Weight 0.5 lbs  
Total pieces 1  
Shipper reference Ricardo B  
Special handling section Deliver Weekday  
Service FedEx 2Day A.M  
Delivered To Receptionist/Front Desk  
Total shipment weight 0.5 lbs / 0.23 kgs  
Packaging FedEx Envelope

## Ricardo Barreras

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**From:** Andrews, Amy (UTC) <aandrews@utc.wa.gov>  
**Sent:** Tuesday, June 03, 2014 5:28 PM  
**To:** Ricardo Barreras  
**Subject:** RE: Incomplete Annual Report Notification for Locus Telecommunications, Inc.

Thank you Ricardo.

I have everything I need now.

*Amy Andrews*  
Fiscal Analyst  
Utilities & Transportation Commission  
PO Box 47250  
Olympia, WA 98504-7250  
☎ 360.664.1157  
☎ 360.664.1289  
🌐 [www.utc.wa.gov](http://www.utc.wa.gov)

**COPY** (23)

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**From:** Ricardo Barreras [mailto:ricardo@locus.net]  
**Sent:** Tuesday, June 03, 2014 2:26 PM  
**To:** Andrews, Amy (UTC)  
**Cc:** ricardo@locus.net  
**Subject:** RE: Incomplete Annual Report Notification for Locus Telecommunications, Inc.

Good Day Again,

Please find the attached and rest-assured that "today is not my day".

Regards,  
Ricardo Barreras | Sr. Manager - Compliance & Regulatory | Risk Management  
Office: 201-585-3681 | Fax: 201-947-6100  
Email: [ricardo@locus.net](mailto:ricardo@locus.net)



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**From:** Andrews, Amy (UTC) [mailto:aandrews@utc.wa.gov]  
**Sent:** Tuesday, June 03, 2014 3:48 PM  
**To:** Ricardo Barreras  
**Cc:** Andrews, Amy (UTC)  
**Subject:** RE: Incomplete Annual Report Notification for Locus Telecommunications, Inc.