QUESTIONS PRESENTED

We live in a fast-paced society where technological innovations make possible the most unthinkable forms of trespass. Never before have policy-makers had to confront this issue. Recent uproar over the revelations of former government contractor, Edward Snowden, has sparked a public policy debate about our national surveillance programs. Similar information technologies are being deployed at the state level for various purposes, such as measuring energy consumption. The Smart Grid is one such program. At the heart of this matter lies the ultimate question of whether the federally-mandated and federally-funded California Smart Grid violates constitutional rights.

1. Does the federally-funded California Smart Grid chill freedom of speech? Can this be argued?

2. Does the federally-funded California Smart Grid violate the Free Exercise Clause of the First Amendment? Can this be argued?

3. Does the federally-funded California Smart Grid violate the Religious Freedoms Restoration Act (RFRA)? Can this be argued?

4. Is the federally-funded California Smart Grid an unwarranted search or seizure prohibited by the Fourth Amendment? Can this be argued?

5. Does the federally-funded California Smart Grid usurp private property rights or liberties guaranteed by the Fifth Amendment? Can this be argued?

6. Does the federally-funded California Smart Grid violate the Right to Privacy? Can this be argued?

7. Was Due Process compromised during the approval, implementation, or oversight of the federally-funded California Smart Grid? Can this be argued?

8. Does the federally-funded California Smart Grid violate the ban on human experimentation? Can this be argued?

9. Are Smart Meters or their radio-emissions a banned hazardous substance? Can this be argued?

10. Does the federally-funded California Smart Grid violate the Clean Air Act? Can this be argued?

11. Does the federally-funded California Smart Grid violate the Consumer Product Safety Act? Can this be argued?

12. Did the Defendants defraud the U. S. Government while procuring federal funding for the California Smart Grid? Can this be argued?

13. Is the District Court constitutionally barred from requiring an indigent litigant to borrow money to pay court fees? Can this be argued?

PARTIES

"Petitioner"/Plaintiff Deborah Cooney; Defendant California Public Utilities Commission ("CPUC"); Defendant "State" of California; Defendant Michael R. "Peevey", former President of the California Public Utilities Commission (CPUC); Defendant Kamala D. "Harris", California Attorney General; Defendant San Diego Gas & Electric ("SDG&E"), purveyors of the Smart Grid; and Defendant "Itron", Inc., manufacturers of Smart Grid equipment.

Since the inception of this case in 2012, Michael Peevey has resigned in disgrace from his position as President of the CPUC. The new President, Michael Picker, must also be named in order to effectuate prospective declaratory and injunctive relief. He may also be held liable, individually, for some of the recently incurred compensatory damages.

RULE 29.6 STATEMENT

SDG&E is a wholly-owned subsidiary of Sempra Energy. Petitioner is unaware of any other relevant holdings of any other party. Petitioner is an individual, as well as a fictitious person doing business as Celeste, Celeste Center, Celeste Christmas, Celeste's Kitchen, Big Star Productions, Spit It Out Publishing, Academy of the Stars, World Healing Education Now Foundation, and WHEN Foundation. These fictitious business names were registered with the San Diego County Clerk in 2008. All businesses are closely held and solely owned by the Petitioner, who is the sole employee. Petitioner asks this Court to recognize her status as a fictitious person for the purpose of expanding her rights to include not only those of natural persons, but also the recent judicially-created and far superior rights of fictitious persons.

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