

DENNIS J. SALLAZ, ISB No. 1053
SALLAZ & GATEWOOD, CHTD.
1000 S. Roosevelt
Boise, ID 83705
Home Telephone: (208) 344-1021
Work Telephone: (208) 336-1145
Facsimile: (208) 336-1263
E-Mail: sallaz@sallazlaw.com

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IDAHO PUBLIC
UTILITIES COMMISSION

STATE OF IDAHO

PUBLIC UTILITIES COMMISSION

DENNIS J. SALLAZ)
)
Plaintiff,)
)
vs.)
)
QWEST COMMUNICATIONS,)
)
Defendant.)
_____)

FORMAL COMPLAINT
IDAPA 31.01.01

QWE-T-06-05

I

Plaintiff at all times herein has been a customer of Defendant for in excess of 30 years, with uninterrupted phone service to various numbers including (208) 344-1021, (208) 336-1145 thru (208) 336-1148 and (208) 336-1263, in Boise, Ada County, Idaho, at the address of 1000 and 1004 S. Roosevelt Street, all of which service being fully paid at all times, including the date hereof.

II

That Defendant has wrongfully and improperly charged Plaintiff for phone service and charges to a phone number located in Canyon County, Idaho, listed as (208) 454-5144, evidently ordered by Plaintiff's ex-wife, one Renee Baird. Said service was never ordered by Plaintiff, used by Plaintiff or

FORMAL COMPLAINT
IDAPA 31.01.01-

ORIGINAL

was never even known by Plaintiff prior to receipt of a billing and threat made by Defendant to terminate Plaintiff's phone service. Said threat and demand is attached hereto. (See Exhibit A)

III

The Plaintiff has notified Defendant by phone and writing (see Exhibit B attached hereto) of their error herein, and the facts herein stated. Defendant acknowledged their error and mistake and have cancelled all phone service to said Renee Baird, but have once again wrongfully threatened to terminate Plaintiff's phone service which continues to be in full force and effect, and paid in full.

IV

Said unlawful and wrongful termination would cause irreparable harm and damage to Plaintiff both personally and professionally, in a sum that would well exceed \$100,000.00.

V

That this Commission is charged with the duty of preventing this unilateral and unlawful act by Defendant and protecting Plaintiff from this arbitrary action and Plaintiff demands that an immediate Temporary Order be issued, preventing said termination and that this matter and any claims against Plaintiff by Defendant be set for formal hearing and determination, to prevent said irreparable harm to Plaintiff.

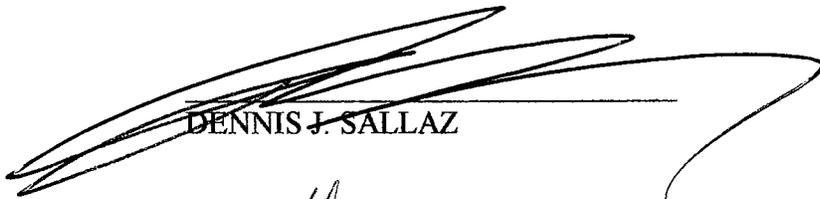
WHEREFORE, PLAINTIFF PRAYS for the immediate issuance of an Ex-Parte Restraining Order, preventing the above termination of Plaintiff's phone service for the reasons herein stated and that this Formal Complaint and said Temporary Restraining Order, be immediately served on the Defendant by the Commission Secretary.

VERIFICATION

DENNIS J. SALLAZ, Being first duly sworn upon oath, depose and says:

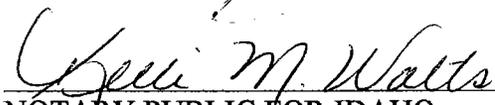
That I am the Plaintiff above named and have read the foregoing and believe the same is true and correct to the best of my knowledge.

DATED This 7 day of March, 2006.


DENNIS J. SALLAZ

SUBSCRIBED AND SWORN TO Before me this 7th day of March, 2006.




NOTARY PUBLIC FOR IDAHO
Residing at Boise, Idaho
My Commission Expires: 10-21-2010

Wednesday, November 16, 2005

DENNIS J SALLAZ
PO BOX 8956
BOISE ID 83707-2956

Telephone Number 208-454-5144-265

We understand how hectic life can get; how things can get shoved aside and overlooked. Our records still indicate an unpaid balance for an account you formerly had with us. Qwest values your business and wants to work with you to resolve this issue.

Our goal is to ensure your present service, (208) 344-1021 010 continues without interruption. In order to do that, we need to:

- Hear from you to resolve this matter.
- or
- Receive payment no later than December 1, 2005.

The total amount due for your previous account is \$279.40. Below is an itemization of the important past due amounts:

Service Provider	Amount Past Due
QWEST LONG DIST	\$82.21
QWEST LONG DIST	\$18.53
QWEST UNREGULATED	\$113.08
QWEST	\$65.58

Your current Qwest local service will not be disconnected for non-payment of charges for Qwest unregulated services, Wireless services or other companies' services.

If the above itemization includes amounts for past-due services that you currently have, those current services may be subject to interruption or removal if:

- We do not receive payment for the past due services from your former account by December 1, 2005.
- You fail to make satisfactory payment arrangements on your former account.

If your current service(s) are disconnected or removed, you may be required to pay:

- A restoral charge of \$20.00 per line and/or a new installation charge.
- A security deposit.

We have a number of electronic payment options you can use to expedite payment of your former account. You can make an electronic payment by calling our office at 1-800-423-8994. Please Note: If you make payment from an account with insufficient funds, your current service(s) will be disconnected without further notice.

If you have already paid your former account, or if you disagree with the amounts past due, as shown above, please contact us at once at 1-800-423-8994. We will review your former account and correct our records if necessary.

Qwest Credit Management Center

Please see reverse side of this notice for state regulatory guidelines.

SALLAZ & GATEWOOD, CHARTERED

1000 South Roosevelt Street
Post Office Box 8956 Boise ID 83707

Telephone (208) 336-1145
Facsimile (208) 336-1263
E-mail

Dennis J. Sallaz
G. Scott Gatewood

September 1, 2005

QWEST
Payment Center
Denver, CO 80244-0001

FILE COPY

Re: Acct. No. 208-454-5144F 2651

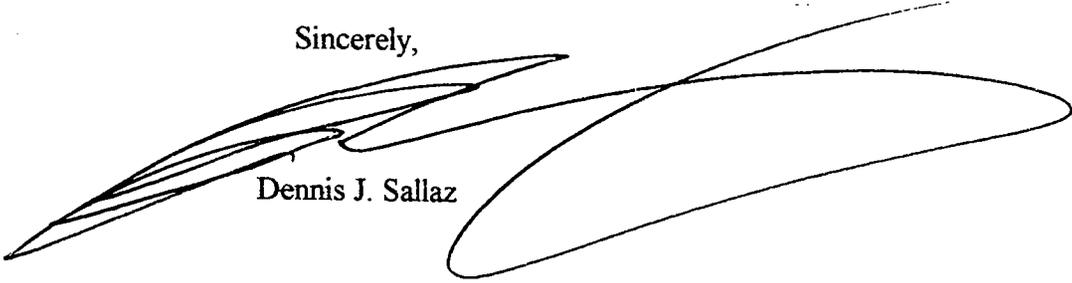
To Whom It May Concern:

I received a bill from you today, in reference to the above account. Please note that this is not my bill, is not my telephone number, nor has it ever been my telephone number or responsibility.

Please remove my name from this account or terminate service immediately.

Please do not hesitate to contact me at the number above should you have any questions.

Sincerely,


Dennis J. Sallaz

DJS/kw

EXHIBIT B

THIS BILL INCLUDES THESE QWEST SERVICES:

DENNIS SALLAZ
Account Number: 208 454-5144F 2651

HOME INTERNET LONG DISTANCE WIRELESS DIGITAL TV

Previous Balance	New Charges	Total Amount Due	Due Date for New Charges
\$252.66	\$26.41	\$279.07	Upon Receipt

Bill Date
Aug 18, 2005

Qwest
Customer Service 1 800 244-1111
Repair 1 800 573-1311

Visit www.qwest.com

Account Summary

Final Bill

Previous Balance	
Charges	252.66
Past Due Balance	\$252.66
New Charges	
Qwest Home Service	(Page 3) .. 11.26
Qwest Long Distance	(Page 4) .. 15.15
Total New Charges	\$26.41
Total Amount Due	\$279.07

This is your Final Bill for services billed by Qwest and reflects all charges applied to your account through Aug 18. Now that your account is closed, your calling cards are no longer valid. Please destroy them.

Please fold, tear here and return this portion with your payment.



To change your billing address, call us at 1-800-244-1111

Account Number: 208-454-5144F 2651
Bill Due Date: Upon Receipt

TOTAL AMOUNT DUE: \$279.07

Amount Enclosed \$ _____

1604024016270805



DENNIS SALLAZ
PO BOX 8956
BOISE ID 83707-2956

QWEST
PAYMENT CNTR
DENVER, CO 80244-0001



61 03208454514402653 0127081805 000002526606 000002790707

DENNIS SALLAZ
Account Number: 208 454-5144F 2651

Information About Your Account

At Qwest, our top priority is providing you with quality customer service. As part of that commitment, we have prepared the following information to help you understand your account. If you need additional assistance, please call Customer Service at the number listed on the front of this statement.

To make additional payments, make a check payable to Qwest. Write your account number on your check and mail to:

Qwest
Payment Cntr
Denver, CO 80244-0001

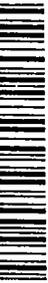
Or, pay online @ www.qwest.com

Messages

Visit qwest.com

- To view and pay your bill
- To change your billing address
- To order new products and services
- To check your Qwest Wireless minutes

Thank you for your business!



THIS PAGE INCLUDES THESE QWEST SERVICES:

- HOME INTERNET LONG DISTANCE WIRELESS DIGITAL TV

DENNIS SALLAZ
 Account Number: 208 454-5144F 2651

Customer Service 1 800 244-1111

Visit www.qwest.com

Qwest Home Service Detail

Service Additions & Changes

Aug 18, 2005 Order Number D33083846
 Remove Service
 208 454-5144

- 1 Credit For Telephone Assistance Plan - Federal
 - 1 Credit For Telephone Assistance Plan - Federal
 - 1 Credit For Telephone Assistance Plan - State
 - 1 Non-Published Service
 - 1 Qwest Choice Home With 3 selected features (Charges for lines & features appear separately on the bill)
 - 1 Residence Line
 - 1 Federal Access Charge
- Credit for Service Previously Billed from Aug 18 to Aug 25

Item Rate Subtotal

-4.85
 -\$4.85

Directory Assistance

Directory Assistance

12 Calls at \$1.25

15.00

\$15.00

Local Long Distance

Date	Time	Place	Number	Type	Minutes
1. Aug 03	9:41 A	To ONTARIO	OR 541 881 8822	D	3

.75

\$.75

Type of Call Codes:
 D - Dial Day - Full Rate

Taxes, Fees & Surcharges

The following charges are permitted by local, state and federal governments. For more information, visit our website at www.qwest.com.

Federal Excise at 3%

.36

\$.36

Total Qwest Home Service

\$11.26

THIS PAGE INCLUDES THESE QWEST SERVICES:

DENNIS SALLAZ
Account Number: 208 454-5144F 2651

- HOME INTERNET LONG DISTANCE WIRELESS DIGITAL TV

Customer Service 1 800 244-1111

Visit www.qwest.com

Qwest Long Distance Summary of Charges for July

Your LD Account Balance - Qwest Long Distance

Current Service Charges	\$13.29
Government Fees and Taxes	
Federal Excise Tax	.44
Subtotal	\$.44
Other Fees & Monthly Charges	
Federal Universal Service Fund	1.33
Fed Telecom Relay & Admin Fee	.07
Idaho Universal Service Fund	.02
Subtotal	\$1.42

Current Total Charges	\$15.15
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Current Total Charges, detail by sub-account

DENNIS SALLAZ Qwest Choice Long Distance	
Current Service Charges	13.29
Federal Excise Tax	.44
Federal Universal Service Fund	1.33
Fed Telecom Relay & Admin Fee	.07
Idaho Universal Service Fund	.02
Subtotal	\$15.15

Current Total Charges	\$15.15
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Service Summary of Charges

DENNIS SALLAZ

Plan/Feature Chrgs	Calls	Min:Sec	Usage Charges	Nonrecur. Charges	Monthly Charges	Total Charges
Long Distance	35	206:00	10.30	0.00	2.99	2.99
Total	35	206:00	\$10.30	\$0.00	\$2.99	\$13.29

THIS PAGE INCLUDES THESE QWEST SERVICES:

- HOME
 INTERNET
 LONG DISTANCE
 WIRELESS
 DIGITAL TV

DENNIS SALLAZ
 Account Number: 208 454-5144F 2651

Customer Service 1 800 244-1111

Visit www.qwest.com

Summary of Usage Reports

Domestic Summary Report

DENNIS SALLAZ Qwest Choice Long Distance

Description	Period	Calls	Min:Sec	Charges
1+ INTERSTATE	DAY	18	133:00	6.65
1+ INTERSTATE	NITE	14	68:00	3.40
Subtotal				10.05
1+ INTRALATA	DAY	2	2:00	.10
1+ INTRALATA	NITE	1	3:00	.15
Subtotal				.25
Total		35	206:00	\$10.30

Do you have questions about your Qwest Long Distance Service or bill? Simply call 1-800-244-1111 and a Qwest Service Representative will be happy to assist you.

Service Detail - Plan/Feature Charges

DENNIS SALLAZ

Description	Qty.	Period	Nonrecurring Charges	Monthly Charges	Total Charges
Qwest Domestic Plan Fee	1	JUL 16-AUG 15	0.00	2.00	2.00
Interstate Services Fee	1	JUL 16-AUG 15	0.00	0.99	.99
Total Plan/Feature Charges			\$0.00	\$2.99	\$2.99

Service Detail - Long Distance Usage

DENNIS SALLAZ

208-454-5144

No.	Date	Time	Called Number	Location	OR	Min:Sec	Charges
1.	Jul 18	10:32A	541 915-7504	EUGENE	OR	8:00	.40
2.	Jul 18	10:48A	541 915-7504	EUGENE	OR	4:00	.20
3.	Jul 18	10:55A	503 663-3022	GRESHAM	OR	4:00	.20

THIS PAGE INCLUDES THESE QWEST SERVICES:

DENNIS SALLAZ

Account Number: 208 454-5144F 2651

HOME INTERNET LONG DISTANCE WIRELESS DIGITAL TV

Customer Service 1 800 244-1111

Visit www.qwest.com

Service Detail - Long Distance Usage

208-454-5144

No.	Date	Time	Called Number	Location	Min:Sec	Charges
1.	Jul 18	12:51P	503 708-3348	PORTLAND OR	13:00	.65
2.	Jul 18	2:45P	541 915-7504	EUGENE OR	1:00	.05
3.	Jul 18	4:26P	541 915-7504	EUGENE OR	2:00	.10
4.	Jul 18	4:34P	541 915-7504	EUGENE OR	5:00	.25
5.	Jul 23	8:41A	541 915-7504	EUGENE OR	1:00	.05
6.	Jul 24	9:30P	541 915-7504	EUGENE OR	15:00	.75
7.	Jul 26	9:31P	503 695-5715	CORBETT OR	1:00	.05
8.	Jul 27	6:59A	541 915-7504	EUGENE OR	16:00	.80
9.	Jul 28	8:12P	541 915-7504	EUGENE OR	1:00	.05
10.	Jul 29	12:31P	541 380-0689	HOOD RIVER OR	1:00	.05
11.	Jul 30	10:25A	208 315-1308	MCCALL ID	3:00	.15
12.	Aug 01	12:25P	541 857-2961	MEDFORD OR	15:00	.75
13.	Aug 02	10:34A	801 973-2210	SALT LAKE UT	5:00	.25
14.	Aug 03	8:14A	541 915-7504	EUGENE OR	6:00	.30
15.	Aug 03	10:21A	541 889-0668	ONTARIO OR	7:00	.35
16.	Aug 03	6:22P	541 915-7504	EUGENE OR	11:00	.55
17.	Aug 03	10:17P	541 915-7504	EUGENE OR	1:00	.05
18.	Aug 03	11:06P	541 915-7504	EUGENE OR	10:00	.50
19.	Aug 04	8:42A	541 915-7504	EUGENE OR	19:00	.95
20.	Aug 04	10:43P	541 915-7504	EUGENE OR	9:00	.45
21.	Aug 06	6:12P	541 915-7504	EUGENE OR	1:00	.05
22.	Aug 06	11:22P	541 915-7504	EUGENE OR	3:00	.15
23.	Aug 08	9:28A	541 915-7504	EUGENE OR	7:00	.35
24.	Aug 08	10:49A	208 315-1308	MCCALL ID	1:00	.05
25.	Aug 08	10:49A	208 628-3725	RIGGINS ID	1:00	.05
26.	Aug 09	9:22A	541 485-1700	EUGENE OR	5:00	.25
27.	Aug 09	5:51P	541 277-3605	JUNTURA OR	3:00	.15
28.	Aug 09	8:22P	541 915-7504	EUGENE OR	13:00	.65
29.	Aug 10	6:23P	541 915-7504	EUGENE OR	2:00	.10
30.	Aug 11	9:02P	503 663-3022	GRESHAM OR	10:00	.50
31.	Aug 13	8:03A	541 915-7504	EUGENE OR	1:00	.05
32.	Aug 13	9:05A	541 915-7504	EUGENE OR	1:00	.05

Total calls for 208-454-5144	35	206:00	\$10.30
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This Portion of Your Bill Reflects Calls Served By Qwest Long Distance.