

State of Florida



Public Service Commission  
-M-E-M-O-R-A-N-D-U-M-

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**DATE:** November 14, 2002  
**TO:** Blanca S. Bayó, Commission Clerk and Administrative Services Director  
**FROM:** Jeff Bates, Research Assistant, Division of Competitive Markets & Enforcement *JB*  
**RE:** Correspondence for Docket No. 020904-TP

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Please file the attached faxed correspondence received from Edward A. Maldonado, Esq. of Maldonado & Glenn, P.A., counsel for Pan American Telecom, Inc., and dated November 13, 2002 in the above referenced docket file.

cc: Jessica Elliott (GCL)

DOCUMENT NUMBER - DATE

12491 NOV 14 2002

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**LAW OFFICES OF MALDONADO & GLENN, P.A.**

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**FACSIMILE TRANSMITTAL**

TO: PLEASE PASS TO FLORIDA PUBLIC SERVICE  
COMMISSIONS MR. DALE R. BUYS & MR.  
WAYNE KNIGHT

SUBJECT: PAN AMERICAN TELECOM

FAX NO: 850-413-6537

FROM FAX NO: 305-468-8509

DATE: 13 NOV 02

NUMBER OF PAGES TRANSMITTED: *(including cover sheet)* 3

COMMENTS: ANY QUESTIONS PLEASE CALL.

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**THE LAW OFFICES MALDONADO & GLENN, L.L.P.**

ATTORNEYS & COUNSELORS AT LAW  
8181 NW 36<sup>th</sup> Street, Suite 4, Miami, FL 33166  
Tel: 305-468-1645; Fax: 305-468-8509

November 13, 2002

**TO:** Florida Public Service Commission  
Attn: Mr. Dale R. Buys & Mr. Wayne Knight  
Capital Circle Office Center  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**Send Via Fax:** (850) 413-6537 and Standard Mail

**Re:** Pan American Telecom and Open Docket: 020904

Dear Mr. Buys and Knight,

This letter is in response to your letter of October 22<sup>nd</sup> 2002 to Pan American Telecom requesting an update of information as to its corporate officers and filings made by past corporate officers to the Florida Public Service Commission. On November 12<sup>th</sup> 2002, I met with Ms. Cheryl Lovelace and Mr. Tim Mutton of Pan American in regard to a corporate re-structure of the company to ensure continue service as a competitive telecommunication provider here in the State of Florida. The reasons and rationale for this re-structure is that Ms. Cheryl Lovelace and Mr. Jeffery Groover, the original founders of Pan American Telecom, recently accepted plea bargains on federal charges related to credit card fraud. It is my understanding that Pan American Telecom itself was never related to these charges, and that, it has other owners independent of Ms. Lovelace and Mr. Groover that wish to continue forward as a Florida telecommunications company.

I would like to amend Pan American's current record and begin the process of correctly reflecting the new management. It is also my understanding that Mr. Groover is in jail and may have to turn over his ownership interest. The greatest difficulty in all of this is that the final orders on sentencing and final adjudication has yet to be forwarded to the defense attorneys who worked the case(s). Likewise, the federal government still has custody over the corporate books and other documents necessary for the re-structure. I have already called the U.S. Assistant Attorney to coordinate this issue, however, I am anticipating that it will take some time. Meanwhile, there is an open docket related to and interconnection agreement with Bellsouth before the PSC. I will be contacting counsel for Bellsouth on this matter and will advise them of the re-structure. I believe it prudent, for all involved in this process, that we extend the calendar set on that matter. However, I will defer to the Commission's recommendations. I personally believe that I will need at least 30 days to obtain all documentation from the U.S. Attorneys' office.

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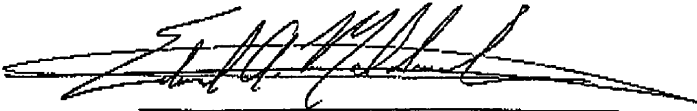
**THE LAW OFFICES MALDONADO & GLENN, L.L.P.**

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There are also several issues that you, on behalf of the commission, raised yesterday related to the original licenses filed for Pan American's IXC and ALEC licensure. In particular, what Ms. Lovelace knew about Mr. Groover's past criminal record, and, the role of the two officers that signed the financials had in the company? I have spoken with Ms. Lovelace today and was informed by her that all materials related to both petitions were prepared by Mr. Jeff Groover. She thereafter signed just the signature pages. I believe that this matter might require that an independent docket be opened so that this may be properly and fully addressed. Again, I differ to your recommendations on this course of action by the Commission.

On behalf of my Client, Pan American Telecom, I thank you in advance for your consideration of this matter, and I remain,

Very Truly Yours,



Edward A. Maldonado, Esq.  
FBN:0129781

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