

BEFORE THE  
PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



**FILED**  
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Application of Ameelio, Inc. for a )  
Certificate of Public Convenience and Necessity )  
to Provide Fixed Non-Facilities-Based )  
Interconnected Voice Over Internet Protocol )  
Service in California )  
\_\_\_\_\_ )

Application No. \_\_\_\_\_

**APPLICATION OF AMEELIO, INC.  
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND  
NECESSITY TO FIXED NON-FACILITIES-BASED INTERCONNECTED VOICE  
OVER INTERNET PROTOCOL SERVICE IN CALIFORNIA**

**CONFIDENTIAL Exhibit I Contains Confidential Information Filed Under Seal**

Geoffrey G. Why  
Julia Watson Bartlett  
Verrill Dana LLP  
One Federal Street, 20<sup>th</sup> Floor  
Boston, MA 02110  
Tel: (617) 309-2600  
Fax: (617) 309-2601  
[gwhy@verrill-law.com](mailto:gwhy@verrill-law.com)  
[jwatson@verrill-law.com](mailto:jwatson@verrill-law.com)

*Counsel for Ameelio, Inc.*

BEFORE THE  
PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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OVER INTERNET PROTOCOL SERVICE IN CALIFORNIA**

Pursuant to the Rules of Practice and Procedure (the “Rules”) of the California Public Utilities Commission (the “Commission”), and the Commission's decisions authorizing competition in California’s telecommunications markets, Ameelio, Inc. (“Applicant”), by and through its attorneys, files this application (“Application”) for a Certificate of Public Convenience and Necessity (“CPCN”) to provide fixed non-facilities-based interconnected Voice Over Internet Protocol (“VoIP”) Service to incarcerated individuals in California.

Correspondence and communications regarding this Application should be addressed to:

Geoffrey G. Why  
Julia Watson Bartlett  
Verrill Dana LLP  
One Federal St., 20<sup>th</sup> Flr.  
Boston, MA 02110  
Tel: 617-309-2600  
[gwhy@verrill-law.com](mailto:gwhy@verrill-law.com)  
[jwatson@verrill-law.com](mailto:jwatson@verrill-law.com)

With a copy to:  
  
Devyn Greenberg  
Chief Operating Officer,  
Ameelio, Inc.  
601 W 26<sup>th</sup> St., M203  
New York, NY 10001  
[devyn@ameelio.org](mailto:devyn@ameelio.org)

Notices, orders, and other pleadings may be served upon these persons, and such service shall be deemed to be service upon the Applicant.

WHEREFORE, Applicant respectfully requests that the Commission enter a Decision granting this Application, thereby conferring on Applicant a CPCN to provide VoIP Service to incarcerated individuals in California.

Dated at Boston, Massachusetts, this 6th day of March, 2025.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Geoffrey G. Why".

Geoffrey G. Why  
Julia Watson Bartlett  
Verrill Dana, LLP  
One Federal Street, 20<sup>th</sup> Flr.  
Boston, MA 02110  
Tel: 617-309-2600  
Fax: 617-309-2601  
[gwhy@verrill-law.com](mailto:gwhy@verrill-law.com)  
[jwatson@verrill-law.com](mailto:jwatson@verrill-law.com)

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

**1013 Registration Form Pursuant to Public Utilities Code Section 1013**

**1. APPLICANT INFORMATION**

Applicant Name: Ameelio, Inc.

Business Address: 601 W 26th Street, M203, New York, NY 10001

Telephone No.: 412-520-5561

E-mail Address: team@ameelio.org

**1.a. Principal Place of Business:** (if different from address above)

See above

**1.b. List all fictitious business names under which Applicant has done business in the last five years:**

N/A

**1.c. Applicant is** (check one only)

- |   |   |
|---|---|
| <input checked="" type="radio"/> Corporation (Inc)    | <input type="radio"/> General Partnership |
| <input type="radio"/> Limited Partnership (LP)        | <input type="radio"/> Sole Proprietor     |
| <input type="radio"/> Limited Liability Company (LLC) | <input type="radio"/> Trust               |
| <input type="radio"/> Other, specify:                 |   |

Attach **Appendix A** with the following: 1) a copy of the entity's organizing documents; (2) evidence of the Applicant's qualification to transact business in California; and (3) a copy of its Certificate of Good Standing Status certified by the Secretary of State of California.

**1.d. Applicant has a foreign ownership interest**

- NO     YES, Foreign entity interest:

**2. APPLICANT REGISTERED AGENT FOR SERVICE OF PROCESS**

Agent Name: Northwest Registered Agent

Address: 2108 N. St. Ste N, Sacramento, CA 95816

Telephone No.: (509) 768-2249

**3. APPLICANT LEGAL DOMICILE** (check one only)

- |                                  |   |
|----------------------------------|---|
| <input type="radio"/> California | <input checked="" type="radio"/> Other, specify: Delaware |
|----------------------------------|---|

4. APPLICANT WILL OPERATE AS (check all that apply)		
<input type="checkbox"/> Competitive Local Exchange Service Provider  <b>4.a. Proposed Facilities</b>  <input type="checkbox"/> Switchless-Reseller/ Non facilities based  <b>4.d. Service Territories</b>  <input type="checkbox"/> Within ALL the Service Territories of Uniform Regulatory Framework Incumbent Local Exchange Carriers  <input type="checkbox"/> Within ALL the Service Territories of the Small Incumbent Local Exchange Carriers  <input type="checkbox"/> In specific portions of the State only ( <b>Appendix B</b> )	<input type="checkbox"/> Interexchange (Intra/Inter-LATA) Service Provider  <b>4.b. Proposed Facilities</b>  <input type="checkbox"/> Switchless-Reseller/ Non facilities based  <b>4.e. Service Territories</b>  <input type="radio"/> Throughout the State of California.  <input type="radio"/> In specific portions of the State only ( <b>Appendix B</b> )	<input checked="" type="checkbox"/> Fixed Interconnected Voice over Internet Protocol (VoIP) Service Provider  <b>4.c. Proposed Facilities</b>  <input checked="" type="checkbox"/> Non facilities based  <b>4.f. Service Territories</b>  <input checked="" type="checkbox"/> Within the Service Territories of Uniform Regulatory Framework Incumbent Local Exchange Carriers  <input checked="" type="checkbox"/> Within the Service Territories of Small Incumbent Local Exchange Carriers  <input type="checkbox"/> In specific portions of the State only ( <b>Appendix B</b> )
<p>Attach <b>Appendix B</b> to include a list of the specific portion(s) or geographical location(s) of the State, and/or ILEC territory(ies); and a copy of the map(s).</p> <p>Applicant seeking to operate in any Small Incumbent Local Exchange Carriers territories must meet the requirements contained in Appendix A of D.20-08-011.</p>		
5. DATE APPLICANT EXPECTS TO BEGIN OR HAS BEGUN OFFERING SERVICE(S) IN CALIFORNIA (If already operating in California, attach <b>Appendix C</b> )		
04/01/2025		

**6. APPLICANT WILL PROVIDE THE FOLLOWING SERVICES IN CALIFORNIA**

(check all that apply)

- Provide voice services (traditional wireline and /or Fixed Interconnected VoIP) directly to customers
- Other (Describe below other services applicant offers, whether or not they are within Commission’s jurisdiction.)

Applicant provides VoIP and video calling services to incarcerated individuals.

**7. SWORN AFFIDAVIT**

TRUE       NOT TRUE (Appendix D)

Neither Applicant, any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Applicant, or anyone acting in a management capacity for Applicant: (a) held one of these positions with a company that filed for bankruptcy; (b) been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (c) been convicted of a felony; (d) been (to his /her knowledge) the subject of a criminal referral by judge or public agency; (e) had a telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction; (f) personally entered into a settlement, or held one of these positions with a company that has entered into settlement of criminal or civil claims involving violations of Sections 17000 et seq., 17200 et seq., or 17500 et seq. of the California Business & Professions Code, or of any other statute, regulation, or decisional law relating to fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (g) been found to have violated any statute, law, or rule pertaining to public utilities or other regulated industries; and /or (h) entered into any settlement agreements or made any voluntary payments or agreed to any other type of monetary forfeitures in resolution of any action by any regulatory body, agency, or attorney general.

Attach **Appendix D** if Applicant’s response to this section is anything other than an unqualified “True.” Applicant must declare exceptions by attaching documentation and describing any such bankruptcies, findings, judgments, convictions, referrals, denials, suspensions, revocations, limitations, settlements, voluntary payments or any other type of monetary forfeitures.

**7.a. List of all affiliated entities** (Attach Appendix E)

**8. APPLICANT HAS THE REQUIRED EXPERTISE TO OPERATE AS A SERVICE PROVIDER OF THE TYPE INDICATED IN SECTION 4 OF THIS FORM.**

TRUE     NOT TRUE

**8.a.** Attach **Appendix F** with List of the names, titles, and street addresses of all officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Applicant, or any person acting in such capacity whether or not formally appointed.

**8.b.** Attach **Appendix G** with Resumes for each personnel identified in Section 8.a. List all employment for each officer, director, partner, agent, or owner (directly or indirectly) of more than 10% of Applicant, or any person acting in such capacity whether or not formally appointed.

**8.c. Applicant Attestation to the Statement Below**     TRUE     NOT TRUE (**Appendix H**)

To the best of Applicant’s knowledge, neither Applicant, any affiliate, officer, director, partner, nor owner of more than 10% of Applicant, or any person acting in such capacity whether or not formally appointed, is being or has been investigated by the Federal Communications Commission or any law enforcement or regulatory agency for failure to comply with any law, rule or order.

Attach **Appendix H** if Applicant’s response to this section is anything other than an unqualified “True.” Applicant must declare exceptions by attaching documentation and describing all such investigations, whether pending, settled voluntarily or resolved in another manner.

**9. FINANCIAL REQUIREMENT**

TRUE     NOT TRUE

Applicant has a minimum of (a) \$25,000 in the case of a switchless reseller / non-facilities-based, reasonably liquid and available to meet the firm’s first year expenses, including an additional \$25,000 for deposits which may be required by local exchange carriers or interexchange carriers; OR (b) has profitable interstate operations to generate the required cash flow.

Attach **Appendix I** with financial instrument that demonstrates the Applicant meets financial requirements.

**10. APPLICANT IS ELIGIBLE AND SEEKS AN EXEMPTION FROM TARIFFING REQUIREMENTS**

TRUE     NOT TRUE (Attach **Appendix J**)

**11. OTHER LICENSE(S) HELD WITH THE COMMISSION, EITHER CURRENT AND/OR PRIOR**

NONE

CURRENT AND/OR PRIOR, specify:

I hereby declare under penalty of perjury under the laws of the State of California that the forgoing information, and all attachments, are true, correct, and complete to the best of my knowledge and belief after due inquiry, and that I am authorized to make this application on behalf of the Applicant named above.

Signed 

Name Geoffrey G. Why

Title Partner

Dated 03/06/2025

Address One Federal St., 20th Floor, Boston, MA 02110

Telephone (617) 292 2854

Email Address gwhy@verrill-law.com