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KARISHMA PATEL\*

REPLY TO: MEDIA

OF COUNSEL:  
ANTHONY S. PINNIE\* >  
STEVEN M. LEVIN  
RICHARD M. CAPPELLI  
FRANCIS L. ZARRELLI  
WARD GUILDAY  
NUSRAT J. RASHID

February 10, 2012

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> ALSO ADMITTED TO D.C.  
\* ALSO ADMITTED TO NJ BAR  
+ ALSO ADMITTED TO THE DELAWARE BAR

Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

A-00121022

Re: PUC vs. Integrity Transportation Services, t/a Integrity Limousine  
No. C-2011-2271023

Dear Sir/Madam:

Enclosed please find the original and three copies of the Petition for Reinstatement of Integrity Transportation Services, LLC, t/a Integrity Limousine, in connection with the above-referenced matter.

If you have any questions or require additional information, please don't hesitate to call my office.

Thank you for your time and assistance.

Very truly yours,

KENNETH R. SCHUSTER & ASSOCIATES, P.C.

By: 

Stephen J. Devine, Esquire

Enclosures

cc: Bureau of Technical Utility Services  
Wayne T. Scott, Prosecutor, Bureau of Investigation & Enforcement  
Michael L. Swindler, Prosecutor, Bureau of Investigation & Enforcement

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KENNETH R. SCHUSTER & ASSOCIATES, P.C.  
KENNETH R. SCHUSTER, ESQUIRE  
Attorney I.D. No. 37666  
By: STEPHEN J. DEVINE, ESQUIRE  
Attorney I.D. No. 37010  
334 West Front Street  
Media, PA 19063  
610-892-9200

Attorney for Petitioner

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :  
COMMISSION, BUREAU OF :  
INVESTIGATION AND ENFORCEMENT :

A-00121022

vs.

NO. C-2011-2271023

INTEGRITY TRANSPORTATION :  
SERVICES, LLC, t/a INTEGRITY :  
LIMOUSINE :

PETITION FOR REINSTATEMENT OF CERTIFICATE OF PETITIONER,  
INTEGRITY TRANSPORTATION SERVICES, LLC, T/A INTEGRITY LIMOUSINE  
PURSUANT TO 52 PA. CODE, §5.41(a) AND 1 PA. CODE §35.17

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

NOW COMES the respondent, Integrity Transportation Services, LLC, t/a Integrity Limousine ("Integrity") in the above-docketed matter, by and through counsel, and petitions the Pennsylvania Public Utility Commission ("Commission") as follows:

1. Integrity Trans Services LLL t/a Integrity Limousine, Petitioner, maintains a principal place of business at 507 Dutton ill Road (C-1), Aston PA 19014.
2. The Petitioner was issued a certificate of public convenience by the Commission on March 11, 2005 at Docket No. A-00121022,F.1, for limousine authority.
3. On or about September 26, 2011, the Commission served a Complaint filed against Integrity at Docket No. C-2011-2259127, alleging that Integrity failed to provide the

required proof of insurance to the Commission, that Integrity's certificate of public convenience was suspended as of August 15, 2011, and a penalty of \$500.00 was assessed. Integrity was advised to file an Answer and pay the penalty within twenty days of receipt of the Complaint.

4. On or about November 3, 2011, having received no Answer to its Complaint at Docket No. C-2011-2259127, the Commission advised Integrity by letter that its certificate of public convenience issued to Respondent at A-00121022 had been cancelled, thereby prohibiting Integrity from rendering service as a common carrier by motor vehicle in intrastate commerce in the Commonwealth of Pennsylvania.
5. On or about January 4, 2012, the Commission served another Complaint filed against Integrity at Docket No. 2011-2271023, alleging that Integrity failed to provide the required vehicle list to the Commission and a civil penalty of \$250.00 was assessed. Integrity was advised to file an Answer to this second Complaint and to pay the \$250.00 penalty within twenty days of receipt of the Complaint.
6. On or about January 23, 2012, counsel for Integrity filed an Answer to Complaint and New Matter at Docket No. C-2011-2271023. However, Respondent's pleading and attached exhibit documents appear to instead be related to the prior Complaint at Docket No. 2011-2259127.
7. Petitioner's violation history consists of only the violations at the above captioned docket numbers, No. C-2011-2271023 and C-2011-2259127.
8. Petitioner currently has no outstanding monetary or other obligations to the Commission.
9. The within petition is timely filed.

10. Petitioner has explained the reasoning for its violation resulting in the cancellation of its certificate in its Answer and New Matter filed on January 34, 2012, at Docket No. C-2011-2271023, acknowledged by the Commission in its Reply to New Matter. Exhibit "A."
11. Petitioner provided the Commission of proof of renewed insurance and has paid the full payment of the fine.
12. Petitioner has or will pay the assessment amount of \$1,387.00 for Fiscal Year 2010-2011.
13. Petitioner understands the Commission will withdraw its complaint at docket NO. C-2011-2271023 and not pursue the collection of the associated \$250.00 penalty.

WHEREFORE, Petitioner requests that its petition be granted and its Certificate of Public Convenience for Limousine Service be reinstated.

Respectfully submitted,

KENNETH R. SCHUSTER & ASSOCIATES, P.C.



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KENNETH R. SCHUSTER, ESQUIRE  
STEPHEN J. DEVINE, ESQUIRE

Date: February 10, 2012

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KENNETH R. SCHUSTER & ASSOCIATES, P.C.  
By: STEPHEN J. DEVINE, ESQUIRE  
Attorney I.D. No. 37010  
334 West Front Street  
Media, PA 19063  
610-892-9200

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Attorney for Defendant

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :  
COMMISSION, BUREAU OF :  
INVESTIGATION AND ENFORCEMENT :

vs. :

No. C-2011-2271023


INTEGRITY TRANSPORTATION :  
SERVICES, LLC, t/a INTEGRITY :  
LIMOUSINE :

VERIFICATION OF RESPONDENT, INTEGRITY  
SERVICES, LLC, T/A INTEGRITY LIMOUSINE

I, Martin Jacobs, am an officer of Petitioner, Integrity Services, LLC, t/a Integrity Limousine, and authorized to make this verification on behalf of Integrity. I hereby verify that the facts set forth in the within Petition for Reinstatement are true and correct to the best of my knowledge, information, and belief. I expect to be able to prove the same at any hearing held in this matter. I understand that the statements herein are subject to 18 Pa. C.S.A Section 4904 relating to unsworn falsification to authorities.

Date:

2/10/12

  
MARTIN JACOBS  
Officer and Authorized Agent of Integrity  
Transportation Services, LLC, t/a  
Integrity Limousine

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# EXHIBIT

“A”



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

February 1, 2012

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission, Bureau of Investigation  
and Enforcement v. Integrity Transportation Services, Inc.  
Docket No. C-2011-2271023

Dear Ms. Chiavetta:

Enclosed for filing are an original and three (3) copies of the Reply to New Matter of the undersigned on behalf of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission, Complainant in the above-referenced case. Copies have been served on the parties of record in accordance with the Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "L. Swindler".

Michael L. Swindler  
Prosecutor  
PA PUC  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 43319

Enclosure

cc: As per Certificate of Service  
Robert Bingaman, TAS

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement	:	
	:	
	:	
	:	
v.	:	C-2011-2271023
	:	
Integrity Transportation Services, LLC T/A Integrity Limousine	:	

**REPLY TO NEW MATTER**

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

NOW COMES, the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), Complainant in the above-docketed matter, by and through counsel, and replies to the Answer To Complaint With New Matter of Integrity Transportation Services, LLC T/A Integrity Limousine (“Integrity”), Respondent herein, pursuant to 52 Pa. Code § 5.63(a) as follows:

1. On or about September 26, 2011, the Commission served a complaint filed against Integrity at Docket No. C-2011-2259127, alleging that Integrity failed to provide the required proof of insurance to the Commission, that Integrity’s certificate of public convenience was suspended as of August 15, 2011, and a penalty of \$500 was assessed. Integrity was advised to file an Answer and pay the penalty within twenty (20) days of receipt of the complaint.

2. On or about November 3, 2011, having received no Answer to its complaint at Docket No. C-2011-2259127, the Commission advised Integrity by letter that its certificate of public convenience issued to Respondent at A-00121022 had been canceled thereby prohibiting Integrity from rendering service as a common carrier by motor vehicle in intrastate commerce in the Commonwealth of Pennsylvania.

3. On or about January 4, 2012, the Commission served another complaint filed against Integrity at Docket No. C-2011-2271023, alleging that Integrity failed to provide the required vehicle list to the Commission and a civil penalty of \$250 was assessed. Integrity was advised to file an Answer to this second complaint and to pay the \$250 penalty within twenty (20) days of receipt of the complaint.

4. On or about January 23, 2012, counsel for Integrity filed an Answer to Complaint and New Matter at Docket No. C-2011-2271023. However, Respondent's pleading and attached exhibit documents appear to instead be related to the prior complaint docketed at C-2011-2259127.

#### **NEW MATTER**

5. Numbered Paragraphs 1 through 4 are incorporated herein by reference.

6. Admitted in part. Denied in part. It is admitted that Integrity "acknowledges the problem" and that the "problem" as defined in Integrity's Answer is with regard to its admitted lapse of insurance. By way of further reply, I&E avers that Integrity's Answer relates to the Commission's complaint at C-2011-2259127 and not the Commission's complaint at C-2011-2271023, to which its Answer and New Matter is docketed. As to the remainder of Respondent's New Matter, Complainant, I&E, is

without knowledge sufficient to form a belief as to the truth of the matters asserted and same are therefore denied and proof thereof demanded.

7. Denied. Complainant, I&E, is without knowledge sufficient to form a belief as to the truth of the matters asserted and same are therefore denied and proof thereof demanded. By way of further response, whether or not Integrity has secured funding to "put its first car back in service," it is prohibited from doing so pursuant to the Commission's letter of November 3, 2011, as set forth in Numbered Paragraph 2, above. Integrity's certificate has been canceled and must be officially reinstated by the Commission before Integrity is authorized to resume passenger service.

8. Admitted in part. Denied in part. It is admitted that Integrity attached a vehicle registration to its Answer. By way of further reply, Integrity's response relates to the Commission's complaint at C-2011-2259127 and not the Commission's complaint at C-2011-2271023, to which its Answer is docketed. Moreover, the year of vehicle and vehicle identification number (VIN) for the sole vehicle identified on the Insurance Identification Card, Premium Finance Agreement Disclosure Statement and Security Agreement and Commonwealth of Pennsylvania Fleet Registration Credential (Attached to the Answer and New Matter and referred to collectively as "Exhibit A") do not match each other. As to the remainder of Respondent's New Matter, Complainant, I&E, is without knowledge sufficient to form a belief as to the truth of the matters asserted and same are therefore denied and proof thereof demanded.

9. Admitted in part. Denied in part. It is admitted that Integrity attached an insurance binder to its Answer. By way of further reply, Integrity's response relates to

the Commission's complaint at C-2011-2259127 and not the Commission's complaint at C-2011-2271023, to which its Answer is docketed. Moreover, the year of vehicle and vehicle identification number (VIN) for the sole vehicle identified on the Insurance Identification Card, Premium Finance Agreement Disclosure Statement and Security Agreement and Commonwealth of Pennsylvania Fleet Registration Credential (Attached to the Answer and New Matter and referred to collectively as "Exhibit A") do not match each other. As to the remainder of Respondent's New Matter, Complainant, I&E, is without knowledge sufficient to form a belief as to the truth of the matters asserted and same are therefore denied and proof thereof demanded.

10. Admitted in part. Denied in part. It is admitted that Integrity paid to the Commission the \$500 penalty relating to its failure to maintain insurance coverage. By way of further reply, this amount was the penalty assessed in the complaint docketed at C-2011-2259127 and not the \$250 penalty assessed in the complaint docketed at C-2011-2271023. Also, Integrity has an outstanding assessment balance of \$1,387 due for Fiscal Year 2010-2011.

11. Admitted.

12. Denied. Complainant, I&E, is without knowledge sufficient to form a belief as to the truth of the matters asserted and same are therefore denied and proof thereof demanded.

13. Denied. It is denied that "move forward" is defined in Integrity's Answer. By way of further reply, Integrity's certificate of public convenience has been canceled. Integrity's certificate of public convenience must be officially reinstated by the

Commission before Integrity is authorized to resume its passenger transportation service.

The procedure for reinstatement is as follows:

Should Respondent wish to again begin transportation operations under the jurisdiction of the Commission, Respondent must file a Petition for Reinstatement of its Certificate for good cause, in accordance with the provisions of 52 Pa. Code §5.41(a) and 1 Pa. Code §35.17. An original and three (3) copies shall be filed with the Secretary, PA Public Utility Commission, P.O. Box 3265, Harrisburg, PA 17105-3265. A copy of the Petition must also be served on the Bureau of Technical Utility Services and all other parties to the proceeding.

The Commission will either grant or deny the Petition. If the Petition is denied or a timely Petition is not filed, Respondent must file a new application for authority in order to obtain a Certificate of Public Convenience. The Commission will assess the following five factors in deciding whether to grant or deny a Petition for Reinstatement:

- (1) Respondent's violation history of Commission rules and regulations,
- (2) Respondent's outstanding obligations to the Commission, such as monetary penalties, assessments, and insurance filings,
- (3) the timeliness of Respondent's filing of the Petition from the date of cancellation of its Certificate,
- (4) Respondent's rationale given for the violation resulting in the cancellation of its Certificate, and
- (5) Respondent's solution to prevent future violations of Commission rules and regulations.

Respondent's Petition for Reinstatement should address each of these five factors.

Further, the Petition must be accompanied by a signed and dated Affidavit or Verification as set forth at 52 Pa. Code §1.36, stating:

that the facts above set forth are true and correct to the best of my knowledge, information and belief. I expect to be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Lastly, Respondent must pay all outstanding assessments and fines before this Commission will act on a Petition for Reinstatement. Specifically, Integrity must pay an assessment amount of \$1,387.<sup>1</sup> Payment must be made by certified check or money order payable to the Commonwealth of Pennsylvania and shall be mailed to the PA Public Utility Commission, P.O. Box 3265, Harrisburg, PA 17105-3265.

14. Admitted in part. Denied in part. It is admitted that Integrity desires to “get back to work.” It is denied that Integrity has met the requirements necessary for it to have its certificate of public convenience reinstated at this time, as set forth in Numbered Paragraph 13, above.

---

<sup>1</sup> The Commission complaint at Docket No. C-2011-2271023 (regarding Integrity’s failure to file a vehicle list) was served *after* the Commission canceled Integrity’s certificate of public convenience. Accordingly, the Commission intends to withdraw said complaint and not pursue collection of the associated \$250 penalty.

WHEREFORE, The Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement, for the reasons set forth herein, respectfully requests that the Answer to Complaint and New Matter of Integrity Transportation Services, LLC be dismissed.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "L. Swindler", written in a cursive style.

Michael L. Swindler  
Prosecutor  
PA Attorney ID No. 43319

*Counsel for Complainant,*  
Pennsylvania Public Utility Commission  
Bureau of Investigation & Enforcement

P. O. Box 3265  
Harrisburg, PA 17105-3265  
(717) 787-5000

Dated: February 1, 2012

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Reply to New Matter upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

### Notification by First Class Mail:

Kenneth R. Schuster & Associates, P.C.  
Stephen J. Devine, Esquire  
334 West Front Street  
Media, PA 19063



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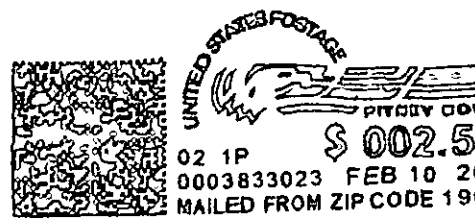
Michael L. Swindler  
Prosecutor  
PA Attorney ID No. 43319

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
717.783.6369  
[mwindler@pa.gov](mailto:mwindler@pa.gov)

Dated: February 1, 2012

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# First Class Mail

LAW OFFICE  
KENNETH R. SCHUSTER  
A PROFESSIONAL CORPORATION  
334 WEST FRONT STREET  
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Secretary  
Penna. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

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