



**JOHN A. PILLAR**

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Hours by Appointment Only at:  
300 Mt. Lebanon Blvd.  
Suite 200 A  
Pittsburgh, PA 15234

January 2<sup>6</sup>, 2013

Re: Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement v.  
Lou Lane, Inc., d/b/a All Star Limousines  
Docket No. C-2013-2342382

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

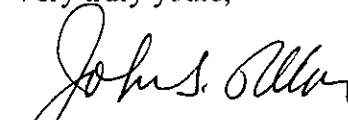
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2013 JAN 28 AM 11:12  
PA P.U.C.  
SECRETARY'S BUREAU

Dear Secretary Chiavetta:

I am enclosing for filing an Answer to Complaint in the above docketed proceeding. A copy has been served on counsel for the Bureau of Investigation and Enforcement in accordance with the Commission's Rules of Practice. In addition, and as stated in the Answer to Complaint, a check in the amount of \$10,000.00 is being mailed today to the Office of the Secretary in partial payment of the amount demanded in the aforementioned Complaint. The Answer also indicates that additional sums will be mailed so that the balance due as stated in the Complaint will be paid on or before March 20, 2013.

Please acknowledge receipt of the enclosed Answer by date stamping the enclosed copy of this transmittal letter and returning it to the undersigned in the stamped, self-addressed envelope enclosed.

Very truly yours,

  
JOHN A. PILLAR

sw

Enclosures

cc: Stephanie M. Wimer, Counsel  
Bureau of Investigation & Enforcement (w/encl.)  
Lou Lane, Inc.

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Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION 2013 JAN 28 AM 11:12

Pennsylvania Public Utility Commission, )  
Bureau of Investigation and Enforcement )  
v. )  
Lou Lane, Inc., d/b/a All Star Limousines )

PA P.U.C.  
SECRETARY'S BUREAU

Docket No. C-2013-2342382

**ANSWER TO COMPLAINT**

AND NOW COMES Lou Lane, Inc., d/b/a All Star Limousines, by its counsel, John A. Pillar, and submits the following answer to the Complaint filed in the above docketed proceeding.

Parties and Jurisdiction

1-11. The averments of paragraphs 1 through 11 of the Complaint dealing with parties and jurisdiction are admitted.

Factual Background  
2011-2012 Fiscal Year

12-18. The averments of paragraphs 12 through 18 of the Complaint are admitted. Respondent's failure to pay the amount owed for the fiscal year ending June 30, 2012 is due to the fact that the company has experienced financial distress in a weak economic market. Nevertheless, Respondent has made extensive efforts to rectify the financial distress it has experienced by reducing office staff and increasing marketing efforts.

2012-2013 Fiscal Year

19-24. The averments of paragraphs 19 through 24 of the Complaint are admitted. Respondent's failure to pay the amount due for the fiscal year ending June 30, 2013 is due to the financial distress experienced by the company as referred to hereinabove. Notwithstanding, Respondent believes that it has made sufficient adjustments in its financial condition to pay off the balance due to the Commission for the periods referred to in the instant Complaint.

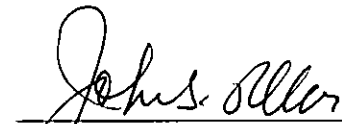
Violation

25. The averments of paragraph 25 of the Complaint constitute a legal statement to which no factual response is possible.

WHEREFORE, Respondent understands that it has been ordered to pay a total of \$31,373.00, which includes a penalty of \$4,092.00, for the assessment balances for the fiscal years ending June 30, 2012 and June 30, 2013. Respondent is submitting a check payable to the Pennsylvania Public Utility Commission in the amount of \$10,000.00 in partial payment of the amount demanded by the Complaint along with this Answer. This payment has been made directly to the Office of the Secretary under separate cover. Respondent will be able to make an additional payment of \$10,000.00 on or before February 25, 2013, and it will arrange to make a final payment of the balance due on or before March 31, 2013. Respondent respectfully requests that it be permitted to make these payments on the dates stated hereinabove so that it can maintain its service to the public for which there is a continuing need and that the Commission delay further enforcement actions until April 1, 2013 so that Respondent can first satisfy the financial demands set forth in the Complaint.

Respectfully submitted

Date: Jan 21<sup>st</sup>, 2013


  
\_\_\_\_\_  
JOHN A. PILLAR  
Attorney for LOU LANE, INC., d/b/a  
ALL STAR LIMOUSINES, INC.

John A. Pillar, Esq.  
265 Merion Drive  
Pittsburgh, PA 15228  
412-343-0970  
e-mail: pillarlaw@verizon.net

VERIFICATION

I verify that the statements made in the foregoing **Answer to Complaint** are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: Jan 24, 2013

  
\_\_\_\_\_  
LOUIS R. WEINER  
President

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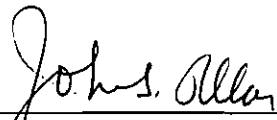
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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing **Answer to Complaint** upon the following parties by first-class mail, postage prepaid, this 25<sup>th</sup> day of January, 2013:

Stephanie M. Wimer, Counsel  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

  
\_\_\_\_\_  
JOHN A. PILLAR  
Attorney for LOU LANE, INC., d/b/a  
ALL STAR LIMOUSINES, INC.

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PA P.U.C.  
SECRETARY'S BUREAU

John A. Pflar  
Attorney at Law  
265 Marion Drive  
Pittsburgh, PA 15228

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Hon. Rosemary Chiavetta, Secretary  
Penn. Public Utility Comm.  
P.O. Box 3265  
Harrisburg, Pa 17105-3265