

CAPTION SHEET

CASE MANAGEMENT SYSTEM

1. REPORT DATE: 00/00/00 :
 2. BUREAU: TAS :
 3. SECTION(S) :
 5. APPROVED BY: : 4. PUBLIC MEETING DATE:
 DIRECTOR: : 00/00/00
 SUPERVISOR: :
 6. PERSON IN CHARGE: DEITRICH : 7. DATE FILED: 12/22/03
 8. DOCKET NO: A-00106172C0301 : 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: TRANSPORTATION & SAFETY, BUREAU OF

RESPONDENT/APPLICANT: LIEBTAG, THOMAS X.

COMP/APP COUNTY:

UTILITY CODE: 791755

ALLEGATION OR SUBJECT

FAILED TO MAINTAIN EVIDENCE OF BODILY INJURY AND PROPERTY DAMAGE LIABILITY INSURANCE.

DOCUMENT
 FOLDER
DOCKETED
 DEC 23 2003

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION, BUREAU OF TRANSPORTATION
AND SAFETY

v.

Thomas X Liebtag
T/A Lee's Moving & Storage

DOCKET NO. A-00106172C 0301

COMPLAINT

The Pennsylvania Public Utility Commission (Commission) is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth. The Commission has delegated its authority to initiate proceedings which are prosecutory in nature to the Bureau of Transportation and Safety and other bureaus with enforcement responsibilities. Pursuant to that delegated authority and Section 701 of the Public Utility Code, the Bureau of Transportation and Safety Prosecutory Staff hereby represents as follows:

1. That Thomas X. Liebtag, T/A Lee's Moving & Storage, respondent, maintains a principal place of business at 1154 Jericho Road, Abington, PA 19001.
2. That respondent was issued a Certificate of Public Convenience by this Commission on January 6, 1986, at Application Docket No. A-00106172.
3. That respondent has failed to maintain evidence of bodily injury and property damage liability insurance on file with this Commission.
4. That respondent, by failing to maintain evidence of insurance on file with this Commission, violated 66 Pa. C.S. §512, 52 Pa. Code §32.2(c), and 52 Pa. Code §32.11(a), §32.12(a) or §32.13(a).

WHEREFORE, unless respondent causes its insurer to file evidence of insurance with this Commission within twenty (20) days of the date of service of this Complaint, the Bureau of Transportation and Safety Prosecutory Staff hereby requests that the Commission issue a Secretarial Letter which (1) cancels the Certificate of Public Convenience held by respondent at Docket No. A-00106172, for failure to maintain evidence of current insurance on file with the Commission, (2) orders such other remedy as the Commission may deem to be appropriate, which may include a fine and the suspension of a vehicle registration and (3) imposes an additional fine on the respondent.

Respectfully submitted,

Wendy J. Kezgel

Wendy J. Kezgel, Chief of Enforcement
Motor Carrier Services & Enforcement Division
Bureau of Transportation and Safety
P.O. Box 3265
Harrisburg, PA 17105-3265

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DEC 23 2003

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03 DEC 22 AM 10:13

VERIFICATION

I, Wendy J. Keezel, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that 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.

Date: 12/19/03

Wendy J. Keezel
Wendy J. Keezel

NOTICE

A. You must file an answer within twenty days of the date of service of this Complaint. The date of service is the mailing date as indicated at the top of the Secretarial cover letter for this complaint and notice, 52 Pa. Code §1.56(a). The answer shall raise all factual and legal arguments that you wish to claim in your defense and must include the reference number of this Complaint. Your answer must be verified and the original and three copies sent to:

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

B. If you fail to answer this complaint within twenty days of the date of service, the Bureau of Transportation and Safety will request that the Commission issue a Secretarial Letter imposing a penalty. Pursuant to 66 Pa. C.S. §3301(a), the penalty could include a fine of up to \$1,000 for each violation, the revocation of your Certificate of Public Convenience, Contract Carrier Permit, or Brokerage license, or any other remedy as may be appropriate. Each day you continue to violate any regulation, direction, requirement, determination or order of the Commission is a separate and distinct offense, subject to additional penalties.

C. You may elect not to contest this Complaint by causing your insurer to file proper evidence of current insurance in accordance with the Commission's regulations within twenty days of the date of service of this Complaint. The proof of insurance must be filed with the Secretary of the Commission at the address set forth in Paragraph A. Upon receipt of the evidence of insurance from your insurer, the complaint proceeding shall be closed. **ACORD CERTIFICATES OF INSURANCE ARE UNACCEPTABLE AS EVIDENCE OF INSURANCE.**

D. If you file an answer which either admits or fails to deny the allegations of the complaint, the Bureau of Transportation and Safety will request that the Commission enter an order imposing a penalty (see Paragraph B). Should the Commission cancel your Certificate of Public Convenience, it may also impose an additional fine of up to \$1,000.

E. If you file an answer which contests the complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision. The judge is not bound by the optional penalty set forth in Paragraph B.

F. Alternative formats of this material are available, for persons with disabilities, by contacting the Insurance/Filing Unit at (717) 783-5933.

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

IN REPLY PLEASE REFER
TO OUR FILE
A-00106172C0301

Date of Service: DECEMBER 24, 2003

THOMAS X. LIEBTAG T/A LEE'S MOVING & STORAGE
1154 JERICHO ROAD
ABINGTON PA 19001

PENNSYLVANIA PUBLIC UTILITY COMMISSION, BUREAU OF
TRANSPORTATION AND SAFETY

v.

THOMAS X. LIEBTAG T/A LEE'S MOVING & STORAGE

Dear Sir/Madam:

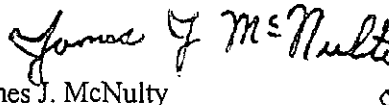
This is to advise that the attached complaint has been filed against you by the Prosecutory Staff of the Bureau of Transportation and Safety.

Detailed instructions on how to proceed are contained in the **NOTICE TO PLEAD**. You are advised to read them carefully.

If you have any questions, contact the complainant at the telephone number shown on the complaint.

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FOLDER

Very truly yours,


James J. McNulty
Secretary

DOCKETED
DEC 23 2003

Attachment

jih

2. Article Number



7106 4575 1293 1186 8389

3. Service Type CERTIFIED MAIL

4. Restricted Delivery? (Extra Fee) Yes

1. Article Addressed to:

A-00106172C0301
FC
Thomas X. Liebtog

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

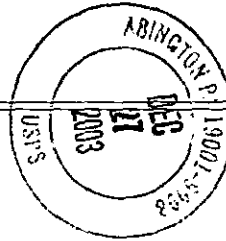
B. Date of Delivery
12/26

C. Signature

X *[Handwritten Signature]*

- Agent
- Addressee
- Yes
- No

D. Is delivery address different from item 1?
If YES, enter delivery address below:



DATE: January 20, 2004
TO: Bureau of Transportation & Safety
FROM: James J. McNulty, Secretary

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Answers or fines were due to be filed or paid on the following cases.

To this date, no answers have been received on the following:

A-00098581C0301	ATKINSON, JOHN P.
A-00106172C0301	LIEBTAG, THOMAS X.
A-00106620C0301	MALLOY, WILLIAM T.
A-00106685C0301	SNYDER, DUANE W.
A-00107766C0301	CAREY, ALLYN B.
A-00107863C0301	COOPER, PHILLIP L. & SANDRA J.
A-00108826C0303	SYSTEM OF SERVICES, INC.
A-00109004C0301	BULL, SOLOMON, SAMUEL & JAMES COPTS
A-00110252C0301	JOYCE, JAMES B.
A-00111094C0301	BARCLAY, CHARLES
A-00111421C0301	SELLERS, K. B., JR., TRKING INC.
A-00112179C0301	HILLTRUX TANK LINES, INC.
A-00112180C0301	FOREST TRUCKING, INC.
A-00112604C0301	BARON, JOLANN
A-00114976C0301	ARANA, LYLE C.
A-00115925C0301	J B TRANSPORT, INC.
A-00116017C0301	BAUMAN, RICHARD
A-00116041C0301	STUCK, SCOTT T. SR.
A-00116050C0301	CASSANDRA & JED CAB CO
A-00116135C0301	HO RO TRUCKING CO., INC.
A-00116139C0301	SMITH, CHARLES M.
A-00116155C0301	JEMAROME CAB CO.
A-00116158C0301	LA CAYENNE CAB CO.
A-00116232C0301	RIDLEY EXCAVATING, INC.
A-00116326C0302	LAGRAND ELITE LIMOUSINE INC
A-00116643C0301	CONRAD, STEVEN W., JR.
A-00117042T0302	MARTHA CAB CO., INC.
A-00117152C0301	BEULAH LAND TRANSPORTATION, INC.
A-00117336C0301	BLASCO CONTRACTORS INC.
A-00119419C0301	BEAR CREEK INDUSTRIES, INC.
A-00119644C0301	RICE, SCOTT W.
A-00119660T0301	SAINT PIERRE ENTERPRISES, INC.
A-00120020C0301	METCALF TRUCKING LLC

DOCKETED
FEB 03 2004

KSB

RJP

Lee's
MOVING STORAGE

1/23/04

A-00106172 C0301

PUBLIC UTILITY COMMISSION

INSURANCE UNIT, BUREAU OF TRANSPORTATION

ATTN: JENNI TACKLER

ORIGINAL

DOCKET # 00106172 ^(C0301) POLICY # CL 355318

PUC # A-10672 - THOMAS X LIEBTAG +/A LEE'S MOVING CHANGED

IN 1994 TO LEE'S MOVING + STORAGE INC

I'M STILL OWNER-MANAGER + CONTROL OF BUSINESS

(215) 884-2484 - 1154 JERICHO RD ABINGTON PA 19001

Tom Liebttag
DOCKETED
MAR 09 2004

ALL MY INSURANCES ARE UPDATED

FOUNDER IN2- 784-9922-

DOCUMENT
FOLDER

RJP

RECEIVED
2004 JAN 26 PM 10:41
PA PUC
SECRETARY'S BUREAU

Tom Liebttag, President

(215) 884-2484

I N T E R
O F F I C E

MEMO

January 28, 2004

Subject: Request for Closure of Insurance Complaints.

To: Wanda Zeiders, Supervisor
Document Management
Secretary's Bureau

From: Tim Zeigler, Manager
Compliance Office
Bureau of Transportation and Safety

DOCUMENT
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Since the respondent(s) listed has/have satisfied the complaint by filing acceptable evidence of insurance, please mark the record "Closed" in the following complaint proceedings:

<u>Complaint Number</u>	<u>Name</u>
A-00106172C0301	Thomas Liebttag
a-00114777C0301	Albert s Prosser
A-00118019C0301	Liberty Luxury Limo Serv Inc
A-00110269C0301	Aspire Limousine Serv. Inc
A-00113993C0301	James P Wolfgang
A-00113695C0401	Thomas E. Newman

DOCKETED
FEB 05 2004