

Christie E. Bower

**Attorney and Counselor at Law
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September 5, 2013

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

ATTN: Rosemary Chiavetta, Secretary

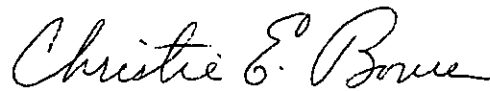
Re: Pennsylvania P.U.C. Bureau of Investigation and Enforcement
v.
WGM Transportation, Inc.
Docket No. C-2013-2370923

Dear Secretary Chiavetta:

Enclosed for filing with your office please find an original and 3 copies of Defendant's Answer.

Thank you for your consideration in this matter. Should you have any questions, please do not hesitate to contact me.

Very truly yours,



CHRISTIE E. BOWER

cc: WGM Transportation, Inc.
David W. Loucks, Chief
Motor Carrier Enforcement
Bureau of Investigation and Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement

Docket No.
C-2013-2370923

v.

WGM TRANSPORTATION INC.
A111651

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

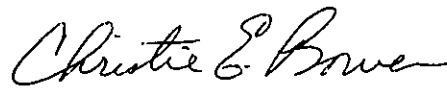
ANSWER TO COMPLAINT

1. Admitted that the Pennsylvania Public Utility Commission is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth.
2. Admitted that the Commission has delegated its authority to initiate proceedings which are prosecutor in nature to the Bureau of investigation and Enforcement with enforcement responsibilities.
3. Admitted that Defendant is WGM Transportation Inc., located at 9047 Franklin Hill Road, East Stroudsburg, PA 18301.
4. Admitted that an annual Taxi Carrier/Vehicle inspection was conducted at the premises situate at 9047 Franklin Hill Road, East Stroudsburg, Monroe County, PA on June 26, 2013 at approximately 11:30 a.m.
5. It is specifically denied that on the date and at the time described in Paragraph 4, Defendant was in violation of 52 Pa. Code Section 29.504 – No driver history obtained. By way of further answer, Defendant, through its agent insurance carrier obtains driver history information for every driver upon hire and, thereafter, every 90 days.

6. It is specifically denied that on the date and at the time described in Paragraph 4, Defendant was in violation of 52 Pa. Code Section 29.505(a) – No criminal record obtained for driver. By way of further answer, Defendant is in substantial compliance with this Code provision.

WHEREFORE, Defendant WGM Transportation Inc. respectfully requests this honorable Commission to dismiss the Complaint of the Bureau of Investigation and Enforcement with prejudice.

9/5/2013



Christie E. Bower, Esquire
Attorney for Defendant WGM
Transportation, Inc.
Attorney ID #46711
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East Stroudsburg, PA 18302
(570) 688-7589

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PA PUC Bureau of Investigation
+ Enforcement
vs. WGM Transportation, Inc.

Docket No.
C-2013-2370923

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VERIFICATION

I, HEREBY STATE THAT THE STATEMENTS MADE IN
THIS ANSWER ARE TRUE AND CORRECT TO THE BEST
OF MY KNOWLEDGE AND BELIEF.

THE UNDERSIGNED UNDERSTANDS THAT FALSE
STATEMENTS HEREIN ARE MADE SUBJECT TO THE
PENALTIES OF 18 Pa.C.S. 4904 RELATING TO UNSWORN
FALSIFICATION TO AUTHORITIES.

WGM Transportation, Inc.

Dated: 9/5/2013

Wayne G. Martin, Jr. Pres.
By: Wayne G. Martin, Jr., President

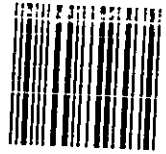
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SECRETARY'S BUREAU

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Pennsylvania Public Utility Commission
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ATTN: Rosemary Chiavetta, Secretary

**RETURN RECEIPT
REQUESTED**