

**SOMMER**  
**LAW GROUP, P C**

6 Market Square  
Pittsburgh, Pennsylvania 15222

(p) 412-471-1266 (f) 412-471-3175  
www.SommerLawGroup.com

**Brad N. Sommer, Esquire**  
**Email: [BNS@sommerlawgroup.com](mailto:BNS@sommerlawgroup.com)**

February 26, 2014

**VIA FIRST CLASS MAIL**

Secretary, Pennsylvania Public Utility Commission  
Bureau of Transportation and Safety  
PO Box 3265, Harrisburg, PA 17105

**RE: City Lights, LLC- A-00119028**

To Whom It May Concern:

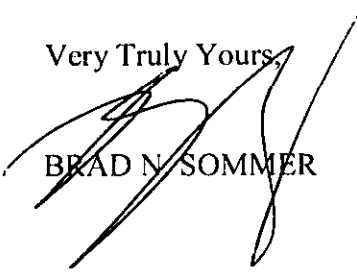
Our office represents City Lights, LLC. Please let this letter serve as 3<sup>rd</sup> notice of name change from City Lights, LLC to Three Rivers Transportation, LLC. City Lights, LLC was initially rejected due to non-payment of annual commissions. Upon payment of past due commissions, City Lights, LLC submitted their 2<sup>nd</sup> Notice of Intent to Change Name. City Lights received notice of approval upon compliance with the request submittal of Form E and a tariff adoption supplement which was to be completed by insurance agent. Enclosed are attached communications with respect to the above with our Insurance Agent as there remains an issue with the Form E and your acceptance of the same.

Please formally note that there has been no change in Ownership or control of the business. In addition, City Lights/ Three Rivers Transportation sole member is Brad N. Sommer (President) and 100% Shareholder. Enclosed, please find all documents supporting the same from the state. We kindly request in light of the above issues, that your office accept our request for name change.

Please advise when this change has been accepted by the Pennsylvania Public Utility Commission, such that we may have the DMV change all vehicle titles accordingly.

Should your offices have any questions regarding the above, please don't hesitate to contact our office.

Very Truly Yours,

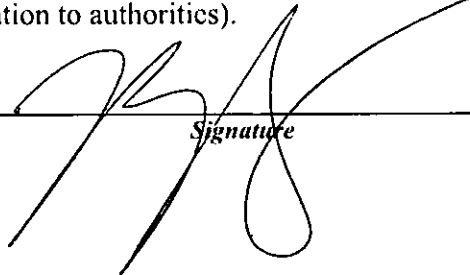
  
BRAD N. SOMMER

RECEIVED  
2014 MAR -3 AM 11:37  
PA.P.U.C.  
SECRETARY'S BUREAU

BNS/hlw  
Enclosures

VERIFICATION

I, Brad N. Sommer, hereby state that the facts above set forth are true and correct (or 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 a 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).

  
\_\_\_\_\_  
*Signature*

2/27/14  
\_\_\_\_\_  
*Date*

RECEIVED  
2014 MAR -3 AM 11:37  
PA.P.U.C.  
SECRETARY'S BUREAU



PENNSYLVANIA  
Department of State

## Corporations

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### Business Entity

#### Filing History

**Date:** 9/14/2011 (Select the link above to view the Business Entity's Filing History)

#### Business Name History

Name	Name Type
THREE RIVERS TRANSPORTATION, LLC	Current Name
CITY LIGHTS, LLC.	Prior Name

#### Limited Liability Company - Domestic - Information

**Entity Number:** 3058377  
**Status:** Active  
**Entity Creation Date:** 3/11/2002  
**State of Business.:** PA  
**Registered Office Address:** 1633 FIAT ST

**Mailing Address:** Pittsburgh PA 15210-0 Allegheny  
 No Address



Home

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Commonwealth of PA Privacy Statement

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE  
CORPORATION BUREAU  
401 NORTH STREET, ROOM 206  
P.O. BOX 8722  
HARRISBURG, PA 17105-8722  
WWW.CORPORATIONS.STATE.PA.US/CORP

THREE RIVERS TRANSPORTATION, LLC

THE CORPORATION BUREAU IS HAPPY TO SEND YOU YOUR FILED DOCUMENT. THE CORPORATION BUREAU IS HERE TO SERVE YOU AND WANTS TO THANK YOU FOR DOING BUSINESS IN PENNSYLVANIA.

IF YOU HAVE ANY QUESTIONS PERTAINING TO THE CORPORATION BUREAU, PLEASE VISIT OUR WEB SITE LOCATED AT WWW.CORPORATIONS.STATE.PA.US/CORP OR PLEASE CALL OUR MAIN INFORMATION TELEPHONE NUMBER (717)787-1057. FOR ADDITIONAL INFORMATION REGARDING BUSINESS AND / OR UCC FILINGS, PLEASE VISIT OUR ONLINE "SEARCHABLE DATABASE" LOCATED ON OUR WEB SITE.

ENTITY NUMBER: 3058377

---

PENNSYLVANIA DEPARTMENT OF STATE  
CORPORATION BUREAU

Certificate of Amendment-Domestic  
(15 Pa.C.S.)

Limited Partnership (§ 8512)  
 Limited Liability Company (§ 8951)

Name		
SOMMER LAW GROUP, PC		
Address		
6 MARKET SQUARE		
City	State	Zip Code
PITTSBURGH	PA	15222

Document will be returned to the name and address you enter to the left.



Commonwealth of Pennsylvania  
Limited Liability Amendment 3 Page(s)



T1125747147

Fcc: 570

In compliance with the requirements of the applicable provisions (relating to certificate of amendment), the undersigned, desiring to amend its Certificate of Limited Partnership/Organization, hereby certifies that:

1. The name of the limited partnership/limited liability company is:  
CITY LIGHTS, LLC

2. The date of filing of the original Certificate of Limited Partnership/Organization: 3/1/02

3. Check, and if appropriate complete, one of the following:

The amendment adopted by the limited partnership/limited liability company, set forth in full, is as follows:  
CHANGE NAME TO: THREE RIVERS TRANSPORTATION, LLC

The amendment adopted by the limited partnership/limited liability company is set forth in full in Exhibit A attached hereto and made a part hereof.

4. Check, and if appropriate complete, one of the following:

The amendment shall be effective upon filing this Certificate of Amendment in the Department of State.

The amendment shall be effective on: \_\_\_\_\_ at \_\_\_\_\_  
Date Hour

PA DEPT. OF STATE

SEP 12 2011

5. Check if the amendment restates the Certificate of Limited Partnership/Organization:

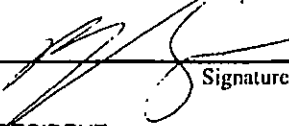
The restated Certificate of Limited Partnership/Organization supersedes the original Certificate of Limited Partnership/Organization and all previous amendments thereto.

IN TESTIMONY WHEREOF, the undersigned limited partnership/limited liability company has caused this Certificate of Amendment to be executed this

24 day of August, 2017.

CITY LIGHTS, LLC

Name of Limited Partnership/Limited Liability Company

 Signature

PRESIDENT

Title



Heather Whitaker <hlw@sommerlawgroup.com>

---

## PUC

1 message

---

**Pam Black** <pamblack@msipa.com>

Fri, Jul 12, 2013 at 12:31 PM

Reply-To: pamblack@msipa.com

To: Heather Whitaker <hlw@sommerlawgroup.com>

Cc: Brad Sommer <bns@sommerlawgroup.com>, Tris Coffin <tcoffin@msipa.com>

Heather:

Our office has been closed due to a power outage and we just recently were able to bring up our computers.


I'm attaching the information that I'm sending to the PUC today.

Let me know if you have any questions or need anything further.

Thank you.

Pam

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 2013\_07\_12\_12\_30\_20.pdf  
169K

Certificate No. A-00119028

Supplement No. 1  
to  
Limousine Pa. PUC No. 2

**CITY LIGHTS LLC**

City Lights, LLC hereby withdraws its Limousine Pa. PUC No. 2.

Signed: Paula J. Black

Address: 140 Park Ave

Washington PA 15361

---

Certificate No. A-00119028

Supplement No. 1  
to  
Limousine Pa. PUC No. 2

**THREE RIVERS TRANSPORTATION LLC**

Three Rivers Transportation, LLC hereby accepts and establishes as Limousine Pa. PUC No. 2  
the tariff of City Lights, LLC heretofore known as Limousine Pa. PUC No. 2

Signed: Paula J. Black

Address: 140 Park Ave.

Washington PA 15361

Issued: \_\_\_\_\_

Effective: \_\_\_\_\_



Heather Whitaker <hlw@sommerlawgroup.com>

---

## RE: Three Rivers Transportation Form E

1 message

---

**Pam Black** <pamblack@msipa.com>  
Reply-To: pamblack@msipa.com  
To: Heather Whitaker <hlw@sommerlawgroup.com>

Fri, Sep 27, 2013 at 12:29 PM

I issued a Certificate of Insurance to them but didn't get a revised Form E.

I'll request it right now.

Thanks,  
Pam

**From:** Heather Whitaker [mailto:hlw@sommerlawgroup.com]  
**Sent:** Friday, September 27, 2013 12:15 PM  
**To:** pamblack@msipa.com  
**Cc:** Philip Coffin; Brad Sommer  
**Subject:** Three Rivers Transportation Form E

Hi Pam and Tris

The PUC never received anything from your office and now have dismissed our application for name change. Do you have confirmation that this was sent to them, you said it was going out July 12 in the mail?

Heather

----- Forwarded message -----

**From:** hlw@sommerlawgroup.com <hlw@sommerlawgroup.com>  
**Date:** Fri, Sep 27, 2013 at 12:08 PM  
**Subject:** Scanned image from EMPIAGIO  
**To:** hlw@sommerlawgroup.com

Reply to: hlw@sommerlawgroup.com <hlw@sommerlawgroup.com>  
Device Name: SOMMER LAW GROUP  
Device Model: MX-3100N  
Location: Orlando, Florida

File Format: PDF MMR(G4)

Resolution: 300dpi x 300dpi

Attached file is scanned image in PDF format.

Use Acrobat(R)Reader(R) or Adobe(R)Reader(R) of Adobe Systems Incorporated to view the document.

Adobe(R)Reader(R) can be downloaded from the following URL:

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<http://www.adobe.com/>

—  
Heather L. Winschel  
Legal Administrator

Sommer Law Group, P.C.  
6 Market Square  
Pittsburgh, PA 15222  
(412) 471-1266-Phone  
(412) 471-3175-Fax

**CONFIDENTIALITY NOTICE:**

**This communication and any accompanying document(s) are confidential and privileged. They are intended for the sole use of the addressee. If you receive this transmission in error, you are advised that any disclosure, copying, distribution, or the taking of any action in reliance upon the communication is strictly prohibited. If you have received this communication in error, please contact us by email, or telephone at 412-471-1266 and delete the original message.**



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

IN REPLY PLEASE  
REFER TO OUR FILE

September 23, 2013

A-00119028

BRAD N SOMMER ESQUIRE  
SOMMER LAW GROUP PC  
6 MARKET SQUARE  
PITTSBURGH PA 15222

**RE: Request for Name Change from City Lights, LLC to Three Rivers Transportation, LLC  
Limousine Authority**

To Whom It May Concern:

By Secretarial Letter dated June 20, 2013, your request for a name change from City Lights, LLC to Three Rivers Transportation, LLC was granted, conditioned upon compliance with the filing of a Form E and tariff adoption supplement. You were to contact your insurance agent/broker so that the required evidence of insurance could be filed with the Commission.

All the specific requirements, which were to be forwarded to the Commission within sixty (60) days, have not been received; **THEREFORE, YOUR APPLICATION FOR A NAME CHANGE HAS BEEN DISMISSED.**

You may again file a request for a name change by submitting the required documents.

Very truly yours,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta", written over a set of horizontal dashed lines.

Rosemary Chiavetta  
Secretary

Cc: Secretary's Bureau – File  
TUS – Compliance Insurance Section

CITY LIGHTS LLC  
1621 SAWMILL RUN BLVD  
PITTSBURGH PA 15210



Heather Whitaker &lt;hlw@sommerlawgroup.com&gt;

---

**PUC**

1 message

**Heather Whitaker** <hlw@sommerlawgroup.com>

Fri, Jul 12, 2013 at 10:28 AM

To: pamblack@msipa.com

Cc: Brad Sommer &lt;bns@sommerlawgroup.com&gt;

Hi Pam

We need this to be submitted to the PUC. Please confirm that this will be handled.

Thanks

Heather

----- Forwarded message -----

From: hlw@sommerlawgroup.com &lt;hlw@sommerlawgroup.com&gt;

Date: Fri, Jul 12, 2013 at 10:26 AM

Subject: Scanned image from EMPIAGIO

To: hlw@sommerlawgroup.com

Reply to: hlw@sommerlawgroup.com &lt;hlw@sommerlawgroup.com&gt;

Device Name: SOMMER LAW GROUP

Device Model: MX-3100N

Location: Orlando, Florida

File Format: PDF MMR(G4)

Resolution: 300dpi x 300dpi

Attached file is scanned image in PDF format.

Use Acrobat(R)Reader(R) or Adobe(R)Reader(R) of Adobe Systems Incorporated to view the document.

Adobe(R)Reader(R) can be downloaded from the following URL:

Adobe, the Adobe logo, Acrobat, the Adobe PDF logo, and Reader are registered trademarks or trademarks of Adobe Systems Incorporated in the United States and other countries.

<http://www.adobe.com/>—  
Heather L. Winschel  
Legal AdministratorSommer Law Group, P.C.  
6 Market Square  
Pittsburgh, PA 15222  
(412) 471-1266-Phone  
(412) 471-3175-Fax

**CONFIDENTIALITY NOTICE:**

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 [hlw@sommerlawgroup.com\\_20130712\\_092658.pdf](#)  
88K



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
BUREAU OF TRANSPORTATION AND SAFETY  
P.O. BOX 3265, HARRISBURG, PA 17105-3265  
June 20, 2013

IN REPLY PLEASE  
REFER TO OUR FILE

A-00119028

BRAD N SOMMER ESQUIRE  
SOMMER LAW GROUP PC  
6 MARKET SQUARE  
PITTSBURGH PA 15222

Re: Request for Name Change from City Lights, LLC to Three Rivers Transportation, LLC  
Limousine Authority

Dear Mr. Sommer:

Your request for the change in name has been received and reviewed. Approval shall be granted upon compliance as stated below:

**YOU ARE ADVISED THAT:**

The Certificate of Public Convenience will be changed to stand in the name of **Three Rivers Transportation, LLC** upon the filing of a Form E and a tariff adoption supplement. Contact your insurance agent/broker so that the required evidence of insurance will be filed with this Commission containing the name of **Three Rivers Transportation, LLC**.

Failure to file a Form E and the enclosed tariff adoption supplement containing the change of entity name within sixty (60) days of the date of this letter will be deemed as dismissal of the request.

Truly yours,

Rosemary Chiavetta  
Secretary

RC/ljm

Enclosure

CITY LIGHTS LLC  
1621 SAWMILL RUN BLVD  
PITTSBURGH PA 15210



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
BUREAU OF TRANSPORTATION AND SAFETY  
P.O. BOX 3265, HARRISBURG, PA 17105-3265  
June 20, 2013

IN REPLY PLEASE  
REFER TO OUR FILE

A-00119028. F.2

BRAD N SOMMER ESQUIRE  
SOMMER LAW GROUP PC  
6 MARKET SQUARE  
PITTSBURGH PA 15222

RE: Request for Name Change from City Lights, LLC to Three Rivers Transportation, LLC  
Group and Party 16+ Authority

Dear Mr. Sommer:

Your request for the change in name has been received and reviewed. Approval shall be granted upon compliance as stated below:

**YOU ARE ADVISED THAT:**

The Certificate of Public Convenience will be changed to stand in the name of **Three Rivers Transportation, LLC** upon the filing of a Form E. Contact your insurance agent/broker so that the required evidence of insurance will be filed with this Commission containing the name of **Three Rivers Transportation, LLC**.

Failure to file a Form E containing the change of name within sixty (60) days of the date of this letter will be deemed as a dismissal of the request.

Very truly yours,

Rosemary Chiavetta  
Secretary

RC/ljm

cc: Document Folder

CITY LIGHTS LLC  
1621 SAWMILL RUN BLVD  
PITTSBURGH PA 15210

## **NAME CHANGE SUPPLEMENT INSTRUCTIONS**

Enclosed you will find one adoption name change supplement. An official of the company should sign and address the copy. **DO NOT ENTER AN ISSUE OR EFFECTIVE DATE.** Retain a copy for your records and return the original to the Public Utility Commission at the address below:

**ATTN: TARIFF SECTION  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
BUREAU OF TECHNICAL UTILITY SERVICES  
COMPLIANCE SECTION  
P.O. BOX 3265  
HARRISBURG, PA 17105-3265**

Certificate No. A-00119028

Supplement No. 1  
to  
Limousine Pa. PUC No. 2

**CITY LIGHTS LLC**

City Lights, LLC hereby withdraws its Limousine Pa. PUC No. 2.

Signed: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

---

Certificate No. A-00119028

Supplement No. 1  
to  
Limousine Pa. PUC No. 2

**THREE RIVERS TRANSPORTATION LLC**

Three Rivers Transportation, LLC hereby accepts and establishes as Limousine Pa. PUC No. 2 the tariff of City Lights, LLC heretofore known as Limousine Pa. PUC No. 2

Signed: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Issued: \_\_\_\_\_

Effective: \_\_\_\_\_



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

IN REPLY PLEASE  
REFER TO OUR FILE

C-2014-2400099

Date of Service: January 16, 2014

CITY LIGHTS LLC  
6 MARKET SQUARE  
PITTSBURGH PA 15222

PENNSYLVANIA PUBLIC UTILITY COMMISSION  
BUREAU OF INVESTIGATION & ENFORCEMENT

v.

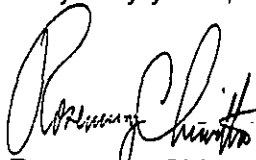
CITY LIGHTS LLC

Dear Sir/Madam:

Please be advised that the attached complaint has been filed against you by the Bureau of Investigation & Enforcement.

Detailed instructions on how to proceed are contained in the NOTICE section, and you are advised to read everything carefully or consult with your attorney.

Very truly yours,

  
Rosemary Chiavetta  
Secretary

*Rob BSN  
7/17 787-  
1168*

Attachments

MH

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION  
BUREAU OF INVESTIGATION AND ENFORCEMENT

V.

DOCKET NO. C-2014-2400099

CITY LIGHTS, LLC  
6 MARKET SQUARE  
PITTSBURGH, PA 15222

COPY

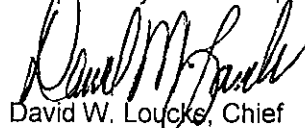
COMPLAINT

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 Investigation and Enforcement and other bureaus with enforcement responsibilities. Pursuant to that delegated authority and Section 701 of the Public Utility Code, the Bureau of Investigation and Enforcement hereby represents as follows:

1. That all authority issued to CITY LIGHTS, LLC, (respondent) is under suspension effective December 12, 2013 for failure to maintain evidence of insurance on file with this Commission.
2. That respondent maintains a principal place of business at 6 MARKET SQUARE, PITTSBURGH, PA 15222.
3. That respondent was issued a Certificate of Public Convenience by this Commission on May 15, 2006, at A-00119028.
4. That respondent has failed to maintain evidence of Liability insurance on file with this Commission. The Bureau of Investigation and Enforcement's proposed civil penalty for this violation is \$500 and cancellation of the Certificate of Public Convenience.
5. 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 pays the penalty of \$500 or files an answer in compliance with the attached notice and/or 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 Investigation and Enforcement will request that the Commission issue an Order which (1) cancels the Certificate of Public Convenience held by respondent at A-00119028 for failure to maintain evidence of current insurance on file with the Commission, (2) fines Respondent the sum of five hundred dollars (\$500.00) for the illegal activity described in this Complaint, (3) orders such other remedy as the Commission may deem to be appropriate, which may include the suspension of a vehicle registration and (4) imposes an additional fine on the respondent should cancellation occur.

Respectfully submitted,



David W. Loucke, Chief  
Motor Carrier Enforcement  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265

## NOTICE

- A. **You must file an Answer within 20 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 Letter. See 52 Pa. Code §1.56(a). The Answer must raise all factual and legal arguments that you wish to claim in your defense, include the docket number of this Complaint, and be verified. You may file your Answer by mailing an original to:

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

Or, you may eFile your Answer using the Commission's website at [www.puc.pa.gov](http://www.puc.pa.gov). The link to eFiling is located under the Filing & Resources tab on the homepage. If your Answer is 250 pages or less, you are not required to file a paper copy. If your Answer exceeds 250 pages, you must file a paper copy with the Secretary's Bureau.

Additionally, a copy should either be mailed to:

Wayne T. Scott, First Deputy Chief Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Or, emailed to Mr. Scott at: [RA-PCCmplntResp@pa.gov](mailto:RA-PCCmplntResp@pa.gov)

- B. If you fail to answer this Complaint within 20 days, the Bureau of Investigation and Enforcement will request that the Commission issue an Order imposing the penalty.
- 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 and by paying the fine proposed in this Complaint by certified check or money order within twenty (20) days of the date of service of this Complaint. **ACORD CERTIFICATES OF INSURANCE and FAXED FORM Es and Hs ARE UNACCEPTABLE AS EVIDENCE OF INSURANCE.**

The proof of insurance must be filed with the:

Compliance Office, Bureau of Technical Utility Services  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Payment of the fine must be made to the **Commonwealth of Pennsylvania** and should be forwarded to:

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

Your payment is an admission that you committed the alleged violation and an agreement to cease and desist from further violations. Upon receipt of the evidence of insurance from your insurer, and upon receipt of your payment, the Complaint proceeding shall be closed.

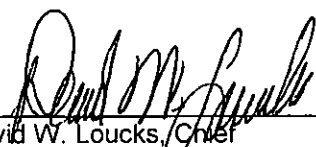
- D. If you file an Answer which either admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request the Commission to issue an Order imposing the penalty set forth in this Complaint.
- E. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision. The Judge is not bound by the penalty set forth in the Complaint, and may impose additional and/or alternative penalties as appropriate.
- F. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code §1.21.

Alternative formats of this material are available for persons with disabilities by contacting the Commission's ADA Coordinator at 717-787-8714.

VERIFICATION

I, David W. Loucks, Chief, Motor Carrier Enforcement, Bureau of Investigation and Enforcement, 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 that the Bureau will be able to prove 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: 1-14-14

  
\_\_\_\_\_  
David W. Loucks, Chief  
Motor Carrier Enforcement  
Bureau of Investigation and Enforcement



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

IN REPLY PLEASE  
REFER TO OUR FILE

February 5, 2014

CITY LIGHTS, LLC  
6 MARKET SQUARE  
PITTSBURGH PA 15222

Re: Return of PA PUC Insurance Filing(s)  
A-00119028

To Whom It May Concern:

This letter is to inform you that the **Form E** made by your insurance company was returned to the company for the reason(s) listed on the attached form.

Please contact your insurance agent with this information so that your agent may follow up with the insurance company to ensure that the corrected Form is resubmitted in time to comply with the Commission's Secretarial Letter/Order and regulations.

Questions concerning this insurance filing may be directed to the Compliance Office, Insurance Section, Bureau of Technical Utility Services at (717) 787-1227.

Sincerely,

A handwritten signature in black ink that reads "Robert P. Bogovic". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Robert P. Bogovic,  
Compliance Specialist  
Bureau of Technical Utility Services

Attachments



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

IN REPLY PLEASE  
REFER TO OUR FILE

February 5, 2014

NATIONAL LIABILITY & FIRE INSURANCE CO  
3024 HARNEY STREET  
OMAHA NEBRASKA 68131-9974

PA Authority Number A-00119028  
Name of Carrier CITY LIGHTS, LLC  
Policy Number 73APS045487

SUBJECT:  FORM E  FORM H  FORM K  UCPC-31  OTHER

THE ENCLOSED INSURANCE FILING IS BEING RETURNED FOR THE FOLLOWING REASON(S):

Incorrect name. Reissue using the following name: **CITY LIGHTS, LLC.**

Incorrect Address Current Main Mailing Address on File is:

Form Has Not Been Signed By An Authorized Company Representative.

No amount of coverage shown on UCPC-31.

Amount of coverage shown on UCPC-31 does not meet the required minimum of \$5,000.

No Effective Date Shown On Policy.

Policy number incorrect:

Reinstatement does not match cancellation date.

Other:

Please submit the correct and proper insurance filing to our office as soon as possible. Failure to do so may result in suspension and/or cancellation of the motor carrier's authorized P. U. C. rights.

Questions concerning this insurance filing may be directed to the Compliance Office, Insurance Section, Bureau of Technical Utility Services at (717) 787-1227.

Sincerely,

Robert P. Bogovic,  
Compliance Specialist  
Bureau of Technical Utility Services

Cc: CITY LIGHTS, LLC

**FORM E**  
**UNIFORM MOTOR CARRIER BODILY INJURY AND PROPERTY DAMAGE**  
**LIABILITY CERTIFICATE OF INSURANCE**

(EXECUTED IN TRIPLICATE)

Filed with Pennsylvania Public Utilities Commission (hereinafter called Commission)  
(Name of Commission)

This is to certify, that the National Liability & Fire Insurance Company  
(Name of Company)

(hereinafter called Company) of 3024 Harney Street, Omaha, NE 68131  
(Home Office Address of Company)

has issued to THREE RIVERS TRANSPORTATION LLC DBA CITY LIGHTS LLC  
(Name of Motor Carrier)

of 6 MARKET SQUARE, PITTSBURGH, PA 15222  
(Address of Motor Carrier)

**REJECTED**

RECEIVED  
BUREAU OF  
TECHNICAL UTILITY SERVICES  
2014 FEB - 4 AM 11:28

a policy or policies of insurance effective from 12/12/2013 12:01 A.M. standard time at the address of the insured stated in said policy or policies and continuing until cancelled as provided herein, which, by attachment of the Uniform Motor Carrier Bodily Injury and Property Damage Liability Insurance Endorsement, has or have been amended to provide automobile bodily injury and property damage liability insurance covering the obligations imposed upon such motor carrier by the provisions of the motor carrier law of the State in which the Commission has jurisdiction or regulations promulgated in accordance therewith.

Whenever requested, the Company agrees to furnish the Commission a duplicate original of said policy or policies and all endorsements thereon.

This certificate and the endorsement described herein may not be cancelled without cancellation of the policy to which it is attached. Such cancellation may be effected by the Company or the insured giving thirty (30) days' notice in writing to the State Commission, such thirty (30) days' notice to commence to run from the date notice is actually received in the office of the Commissioner.

Countersigned at 3024 Harney Street Omaha NE 68131  
(Street Address) (City) (State) (ZIP Code)

this 31st day of January, 20 14



Authorized Representative

Insurance Company File No. 73APS045487  
(Policy Number)

1,000,000 CSL



**SOMMER**  
**LAW GROUP, PC**

6 Market Square  
Pittsburgh, Pennsylvania 15222

(p) 412-471-1266 (f) 412-471-3175  
[www.SommerLawGroup.com](http://www.SommerLawGroup.com)

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February 4, 2014

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

*RE: Answer to complaint filed on by the PUC on January 16, 2014*

Dear Rosemary Chiavetta,

Enclosed please find a copy of our answer along with attached exhibits in support, to the complaint filed by David W. Loucks on behalf of the Pennsylvania Public Utility Commission against City Light, LLC.. This answer is submitted within the twenty days date of service of the complaint made on January 16, 2014.

If there is additional information needed, please contact us right away.

Very truly yours,



**SOMMER**  
**LAW GROUP, P C**

6 Market Square  
Pittsburgh, Pennsylvania 15222

(p) 412-471-1266 (f) 412-471-3175  
[www.SommerLawGroup.com](http://www.SommerLawGroup.com)

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February 4, 2014

Wayne T. Scott, First Deputy Chief Prosecutor  
Pennsylvania Public Utility Commission  
Bureau Investigation and Enforcements  
PO Box 3265  
Harrisburg, PA 17105-3265

***RE: Answer to complaint filed on by the PUC on January 16, 2014***

Dear Wayne T. Scott,

Enclosed please find a copy of our answer along with attached exhibits in support, to the complaint filed by David W. Loucks on behalf of the Pennsylvania Public Utility Commission against City Light, LLC.. This answer is submitted within the twenty days date of service of the complaint made on January 16, 2014.

If there is additional information needed, please contact us right away.

Very truly yours,

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY )  
COMMISSION BUREAU OF )  
INVESTIGATION AND ENFORCEMENT )  
 ) Docket # C-2014-2400099  
 )

v.

CITY LIGHTS LLC

AND NOW COMES, Respondent, by and through its attorney, and files a response to the Complaint as follows:

1. While it is admitted that Respondent was put on notice of the proposed suspension, it had not been clear that the suspension would be enforced as respondent was under the impression that the proper documents, form E, would be timely filed by the insurance company after the insurance policy was renewed on December 12, 2013..
2. Affirmed
3. Affirmed
4. Denied. The liability insurance was renewed on December 12, 2013 and a certificate of insurance was sent. *See* attached Exhibit A: Email to Office Manager Heather Whitaker from Agent Pam Black on December 17, 2013, along with copies of the insurance policy affirming the above. However, Respondent recently learned the insurance company never informed the Agent that they were rejecting Form E- for City Lights, LLC additional/ changed name to Three Rivers Transportation, LLC (see attached Exhibit B: Email from Agent Tris Coffin to Brad Sommer stating the above.) As a result, the Agent never replied to the same or notified our company of any inquiries that may have delayed the filing process with the Commission. *See also* attached Exhibit C: Forms E and F.
5. Denied. As noted above, at no time was respondent aware that the attached forms were not properly or timely filed with the Commission.

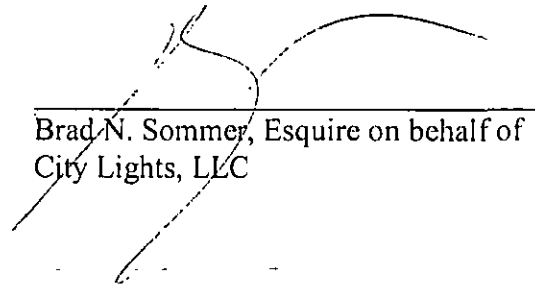
WHEREFORE, Respondent requests appropriate relief the Commission deems fit.

  
\_\_\_\_\_  
Brad N. Sommer, Esquire  
Counsel for City Lights, LLC

VERIFICATION

I, Brad N. Sommer, hereby avers that the facts set forth in the foregoing Answer to Complaint, 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 that the Bureau will 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. C.S. § 4904 relating to unsworn falsification to authorities.

Date 7/4/14

  
\_\_\_\_\_  
Brad N. Sommer, Esquire on behalf of  
City Lights, LLC



Heather Whitaker <hlw@sommerlawgroup.com>

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## Certificates

1 message

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**Pam Black** <pamblack@msipa.com>

Tue, Dec 17, 2013 at 1:08 PM

Reply-To: pamblack@msipa.com

To: Heather Whitaker <hlw@sommerlawgroup.com>

Cc: Brad Sommer <bns@sommerlawgroup.com>, Tris Coffin <tcoffin@msipa.com>

Heather:


Here are your copies of the Certificates issued for the renewals effective 2013-2014.

I'll email the one (1) over to the Pittsburgh Airport and mail the other two (2) in the mail today.

Thanks.

Pam

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 2013\_12\_17\_13\_06\_56.pdf  
201K

EXHIBIT

A



Brad Sommer <bns@sommerlawgroup.com>

---

**FW: Three Rivers Transportation #CP3557513**

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Tris Coffin <tcoffin@msipa.com>  
Reply-To: tcoffin@msipa.com  
To: Brad Sommer <bns@sommerlawgroup.com>  
Cc: pamblack@msipa.com

Tue, Feb 4, 2014 at 8:44 AM

Brad,

As agents, we were not notified that the insurance company was rejecting the issuance of the form E we requested until recently.

They were in error about their reason for rejecting the issuance of the form. We pointed that out to them and again requested the form be issued by the company. They agreed and issued the form for us last week.

Tris

Philip T. Coffin, III

CISR

Marthinsen & Salvitti Insurance Group

140 Park Avenue

Washington, PA 15301

office: 724-222-8400

fax: 724-222-8141

cell: 412 721 3634

Tcoffin@msipa.com

---

**From:** Brad Sommer [mailto:bns@sommerlawgroup.com]  
**Sent:** Monday, February 03, 2014 3:47 PM  
**To:** Tris Coffin  
**Cc:** pamblack@msipa.com

[Quoted text hidden]

[Quoted text hidden]

EXHIBIT

13

com  
6 Market Sq  
Pgh PA 15222

stamps  
\$2.240  
US POSTAGE  
FIRST-CLASS  
062S0008662437  
15222



PITTSBURGH, PA DC 152  
FRI 28 FEB 2014 6M



RECEIVED  
2014 MAR -3 AM 11:37  
PA.P.U.C.  
SECRETARY'S BUREAU

Secretary, Pennsylvania Public  
Utility Commission  
Bureau of Transportation Safety  
PO Box 3265  
Harrisburg PA 17105