

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION, BUREAU OF	:	
INVESTIGATION AND ENFORCEMENT	:	
	:	Docket No. C-2014-2418173
v.	:	
	:	
LIANG ZHANG	:	

**ANSWER TO COMPLAINT**

Pursuant to 52 Pa. Code § 5.61, LIANG ZHANG (“Respondent”), through counsel Edward G. Lanza of the Lanza Firm, LLC, hereby respectfully submits this Answer to the Complaint of Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement (“BI&E”). Respondent answers as follows:

1. Admitted.
2. Denied. Respondent lacks sufficient information to ascertain the truth of the allegations in Paragraph 2, and therefore, the allegations in this paragraph are denied as stated.
3. Admitted in part, denied in part. It is admitted that Respondent operates the vehicle described in paragraph 3. It is specifically denied that Respondent received compensation for transporting Officer Bowser. Respondent lacks sufficient information to ascertain the truth of the remaining allegation in this paragraph, and therefore, the same are denied.
4. Admitted. By way of further answer, Respondent respectfully submits that Respondent is not required to hold a certificate of public convenience issued by the Commission to transport passengers in a vehicle owned and/or operated by Respondent.

5. Denied. Paragraph 5 contains legal conclusions to which no answer is required. To the extent Paragraph 5 contains any factual allegations, the same are denied and proof of the same is required at a hearing in this matter.

WHEREFORE, Respondent requests that the Commission deny the instant Complaint and dismiss the same with prejudice.

Respectfully submitted,



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Counsel for Respondent

Date: July 7, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Answer upon the persons listed below via first class and/or electronic mail in accordance with the requirements of 52 Pa. Code Section 1.54 of the Commission's rules:

MICHAEL SWINDLER, ESQ.  
PUC BUREAU OF INVESTIGATION & ENFORCEMENT  
P.O. BOX 3265  
HARRISBURG, PA 17105-3265

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Edward G. Lanza, Esq.

Date: July 7, 2014