

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION)	
BUREAU OF INVESTIGATION AND ENFORCEMENT)	
)	
Plaintiffs,)	
V.)	
)	DOCKET NO. C-2015-249817
)	
ALFRED KNIGHT JR)	
TA KNIGHT LIFE LIMOUSINE SERVICES)	
805 W 26 TH ST)	
ERIE, PA 16508)	
)	
Defendant.)	

ANSWER AND AFFIRMATIVE DEFENSES

COMES NOW, Defendant, ALFRED KNIGHT, JR., TA KNIGHT LIFE LIMOUSINE SERVICES, in response to Plaintiff, PENNSYLVANIA PUBLIC UTILITY COMMISSION BUREAU OF INVESTIGATION AND ENFORCEMENT’s complaint, and hereby files this, their ANSWER AND AFFIRMATIVE DEFENSES as follows:

1. Admitted that Alfred Knight, Jr. maintains a principal place of business at 805 West 26th Street, Erie, Pennsylvania, 16508, and that he owns a fictitious name of Knight Life Limousine Service, otherwise the averments contained in Paragraph 1 are denied.
2. Admitted that Alfred Knight, Jr. submitted an application for limousine authority to the Public Utility Commission and that the application was denied, otherwise this defendant is without knowledge of the averments contained in Paragraph 1 and therefore, they are denied.
3. It is Denied that PUC Enforcement Officer David Gill received a quote from Alfred Knight, Jr. to transport anyone through any business owned and or operated by Alfred Knight, Jr., and Defendants hereby demand strict proof of this allegation. It is admitted that Alfred Knight, Jr. does not hold a certificate of public convenience from the Public Utility Commission. The remainder of averments contained in Paragraph 3, should any remain, are hereby Denied and strict proof is hereby demanded.

4. All of the averments contained within Paragraph 4 are hereby Denied and strict proof is hereby demanded.

WHEREFORE, Defendant, ALFRED KNIGHT, JR., TA KNIGHT LIFE LIMOUSINE SERVICES hereby demands judgment in his favor and against Plaintiffs.

AFFIRMATIVE DEFENSES

First Affirmative Defense

The allegations contained in the Complaint filed herein do not accurately represent the truth and have failed to accurately state a cause of action against the Defendants. David Gill did call Alfred Knight, Jr. and ask for transportation for his “daughter” and to come and look at Mr. Knight’s Van. Mr. Knight informed Mr. Gill that he wouldn’t be able to transport Mr. Gill’s daughter however, he would be able to arrange for limousine services through a company whom he believed would do a great job. Mr. Knight intended to refer the services of La Grande Elite Limousine Services to Mr. Gill at no profit to Mr. Knight at all. Mr. Gill’s alleged statements, which appear to be unverified, are patently false and should not be accepted by the commission as proof of any wrongdoing by the Defendants herein.

Second Affirmative Defense

This claim is meritless as Alfred Knight, Jr. has not violated Public Utility Code, 66 Pa. C.S. §1101 as he at no time offered, rendered, furnished, or supplied a service to David Gill or his “daughter” at any time relevant to these proceedings. It is not a violation to refer a service of another company at no profit to one’s self, only to attempt to increase public opinion and image of Alfred Knight, Jr. by referring reputable businesses hoping that clients will utilize his entertainment “Disc Jockey” services in the future. This defendant only referred another business in the area to Mr. Gill. Mr. Knight further provided the PUC with a letter explaining the lack of merit in the investigation. The letter is attached hereto.

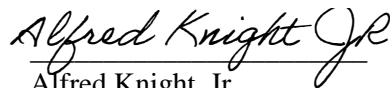
Third Affirmative Defense

Not only has David Gill fraudulently falsified his allegations against Alfred Knight, Jr. in the Complaint, he also has slandered and defamed Mr. Knight and his businesses, to the community at large and specifically Mr. Knight's business' neighbors. Mr. Gill approached the neighboring businesses of Mr. Knight and provided them with Falsified information, harming his reputation in the community and with the neighboring businesses and negatively affecting his income and earning potential within the community. The extent of effect of this slander and defamation are not yet known to this defendant, however, Defendants reserve their right to bring a counter-claim and/or separate action against Mr. Gill and/or the PUC for Mr. Gill's improper, slanderous, defamatory activities. The allegations appear to be an attempt to bring a fraud upon the commission or a personal vendetta of Mr. Gill against Mr. Knight.

Fourth Affirmative Defense

While this Defendant is unaware of the person actually making the complaint which started this "witch hunt" it is believed that this entire allegation has been prompted by a fabricated complaint by a limousine company owner in the Erie area who is attempting to eliminate any potential competition to his services. Defendant reserves his right to investigate and demands that Mr. Gill disclose the source of the initial complaint against this Defendant and that discovery be had on the origins of the complaint and not only Mr. Gill's veracity but the original complaint's veracity as well.

Respectfully Submitted,



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