

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement

:
:
:
:
:
:
:
:
:
:
:

Docket No: C-2015-2498921

v.

Celebrity Limousine Service Inc.

ANSWER TO COMPLAINT

COME NOW Celebrity Limousine Service Inc. in its answer to the Complaint of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.

12. Admits only that I&E filed a complaint at Docket no. C-2014-2449858.

Denies the remaining allegations for lack of sufficient knowledge on which to form a belief.

13. Admitted.

14. Admitted.

15. Admitted.

16. Admitted.

17. Admitted.

18. Admitted.


19. Admitted.

20. Admitted.

21. Admits only that respondent has not yet satisfied its 2014-2015 assessment. Denies the second sentence of paragraph 21 as a conclusion of law. Denies that respondent has a history of noncompliance.

WHEREFORE, I&E's proposed civil penalty of 25% should be dismissed and the Complaint should be dismissed.

MacELREE HARVEY, LTD.



James B. Urie, Atty. ID No: 85719
Attorney for Respondent
17 West Miner Street, P.O. Box 660
West Chester, PA 19381-0660
(610) 436-0100
jurie@macelree.com

VERIFICATION

I, Dennis B. Adams, hereby state that I am an officer of Respondent, Celebrity Limousine Service Inc., and that I am authorized to make this verification on Respondent's behalf. By this statement, I hereby verify that the statements made in the foregoing Answer to Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. §4904, relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read 'D-B-A', with a long horizontal flourish extending to the right. The signature is written over a solid horizontal line.

Dennis B. Adams
For Respondent, Celebrity Limousine Inc.

Date: 9/8/15