



**Baurkot & Baurkot**  
*Attorneys*

*George M. Baurkot, Esquire*<sup>†</sup>  
*Daniel J. Baurkot, Esquire*<sup>††</sup>  
*Raymond G. Lahoud, Esquire*<sup>†††</sup>  
*William C. Menard, Esquire*<sup>†††</sup>

205 South Seventh Street  
Easton, PA 18042  
P: 484.544.0022  
T: 888.440.4872  
F: 201.604.6791

Please Reply To:  
Post Office Box 801  
Easton, PA 18044

February 10, 2016

Ms. Rosemary Chiavetta, Secretary  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

**Re: Commonwealth of PA v. Joseph Moussa, et al**  
**Docket No.: C-2016-2509168**

Dear Ms. Chiavetta:

I act on behalf of Mr. Joseph Moussa t/a Yellow Cab of Easton and t/a Easton Taxi. Enclosed please find my client's Answer to the Complaint filed against him.

Thank you in advance for your consideration. Should you have any questions or require additional information, please do contact me.

Very Truly Yours,

**BAURKOT & BAURKOT**

Raymond G. Lahoud, Esquire

RGL: ts  
Enclosure

cc: Joseph Moussa  
Mr. Michael L. Swindler, Deputy Chief Prosecutor (via email 2.8.16)

RECEIVED  
2016 FEB 12 AM 9:46  
PA P.U.C.  
SECRETARY'S BUREAU

† Pennsylvania and District of Columbia  
†† New York, New Jersey and Pennsylvania  
††† New York

1  
**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY** :  
**COMMISSION BUREAU OF** :  
**INVESTIGATION AND ENFORCEMENT** : **DOCKET NO. C-2016-2509168**  
 :  
 :  
 **v.** :  
 :  
**JOSEPH MOUSSA TA YELLOW** :  
**CAB OF EASTON AND TA EASTON TAXI** :  
**715 WALNUT STREET** :  
**EASTON PA 18042** :

**ANSWER TO COMPLAINT**

1. Admitted.
2. Admitted.
3. Denied.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted in Part and Denied in Part. Admitted, Complaint filed October 23, 2013. Denied, sexual remarks and unwanted advances toward the passenger. Admitted, Owner Joseph Moussa stated he would and did terminate the employee. By further response, following an extended period of separation Mr. Rizk was reevaluated and deemed to meet the protocol for reemployment and subsequently reemployed.
8. Denied acts performed in paragraph 3. Denied Respondent filed to maintain adequate, efficient, safe and reasonable service for the safety of patrons.

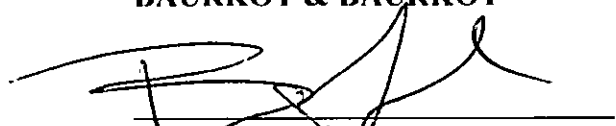
**RECEIVED**  
**2016 FEB 12 AM 9:45**  
**PA P.U.C.**  
**SECRETARY'S BUREAU**

WHEREFORE, Respondent Joseph Moussa t/a Yellow Cab of Easton and t/a Easton Taxi respectfully requests the Commission dismiss this Complaint and other such remedy as the Commission may deem appropriate.

Respectfully Submitted,

**BAURKOT & BAURKOT**

Date: 02-08-14

A handwritten signature in black ink, appearing to read 'R. G. Lahoud', is written over a horizontal line.

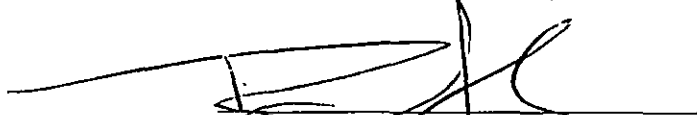
Raymond G. Lahoud, Esquire  
205 South Seventh Street  
PO Box 801  
Easton, PA 18044  
Phone: (484) 544-0022  
Fax: (201) 604-6791  
rgl@baurkotlaw.com  
*Attorneys for the Respondent*

**VERIFICATION**

I, Raymond G. Lahoud, Esquire, 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 Respondent will be able to prove the same at the 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.

**BAURKOT & BAURKOT**

Date: 08-09-16



Raymond G. Lahoud, Esquire  
Attorney for the Respondent

RECEIVED  
2016 FEB 12 AM 9:45  
PA P.U.C.  
SECRETARY'S BUREAU



**Baurkot & Baurkot**  
*Attorneys*

205 South Seventh Street  
Post Office Box 801  
Easton, PA 18044

neopost<sup>M</sup>

02/10/2016

**US POSTAGE**

FIRST-CLASS MAIL

**\$000.48<sup>5</sup>**



ZIP 18042  
041L10244030

RECEIVED

2016 FEB 12 AM 9:43

PA P.U.C.  
SECRETARY'S BUREAU

Ms. Rosemary Chiavetta, Secretary  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

171053265 8099

