

**COMMONWEALTH OF PENNSYLVANIA  
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In the Matter of:	:	Commission Docket No.:
	:	C-2016-2576131
Pa. Pub.Util.Comm'n.	:	
Bureau of Investigation and Enforcement	:	
v.	:	
Amigo Taxi, LLC.	:	

**ANSWER**

Amigo Taxi, LLC (“Amigo Taxi”), through its undersigned attorney. Answers the allegations raised by the Pennsylvania Public Utility Commission’s (the “Commission”) Bureau of Investigation and Enforcement (“BIE”) in its Complaint in the above captioned matter, and in support thereof, states the following:

1. Denied; the statements made in regard to this allegation are conclusions of law to which no responsive pleading is required. To the extent that a response may be required, the assertions are specifically denied.
2. Admitted.
3. Admitted.
4. Denied; the statements made in regard to this allegation are conclusions of law to which no responsive pleading is required. To the extent that a response may be required, Amigo Taxi maintained continuous liability insurance coverage through American Service Insurance Company, Inc. (“American Country”), throughout the time period in question. Acting in accordance with commission regulations, Amigo instructed American Country to file Form E with the Commission; however, due to a clerical error by American Country, the Form E was not filed

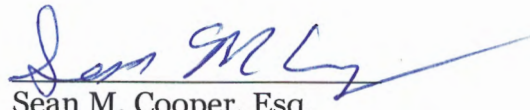
until November 30, 2016 (on or about that date). Respondent has attached proof of continuous insurance to this Answer as "Exhibit A".

5. Denied; the statements made in regard to this allegation are conclusions of law to which no responsive pleading is required. To the extent that a response may be required, the assertions are specifically denied.

WHEREFORE, Amigo Taxi, LLC, respectfully requests that the Commission dismiss the Complaint in the above captioned matter.

Date: 12/2/2016

Respectfully submitted,



Sean M. Cooper, Esq.  
ID# 320940  
620 South 13th Street  
Harrisburg PA 17104  
P: 717.559.5291  
F: 855.559.5291  
[Sean@cooperlawpa.com](mailto:Sean@cooperlawpa.com)

# Exhibit A

# Motor Carrier Information Exchange

National Online Registries

[Create Filing](#)

[Search Filings](#)

[Reports](#)

[My Profile](#)

[User Manual](#)

[Log Out](#)

You have submitted the following motor carrier insurance filings. Your application will be sent to the corresponding state agency automatically and your account will be billed \$ 3.50 If you filed a paper filing, please print out the form now and either mail/fax to the state. Paper filings are not submitted to states via the system

### Insurance Information

**Insurance Company** American Service Insurance Company, Inc.

**Authorized Signature** **Insurance Agent ID**

**Form Type** Form E **Reinstate**

### Certificate of Insurance

<b>Policy Number</b>	CA20651P2016	<b>USDOT</b>	
<b>Underlying Limit</b>	Amount entered will be multiplied by 1000	<b>Liability Limit</b>	30.00 Amount entered will be multiplied by 1000
<b>Effective Date</b>	Oct 27 2016	<b>FMCSA</b>	

### Motor Carrier Information

#### Electronic Filing States

#### Pennsylvania

<b>Insurer #</b>		<b>State MC ID</b>	
<b>Legal Name</b>	AMIGO TAXI LLC		
<b>DBA</b>			
<b>Address</b>	2304 WALNUT ST		
<b>City</b>	HARRISBURG	<b>State *</b>	PENNSYLVANIA
<b>Zip</b>	17103	<b>Country</b>	
<b>Notes</b>	FUC# A-00122492		

#### Non-electronic Filing States

You have submitted the following motor carrier insurance filings. Your application will be sent to the corresponding state agency automatically and your account will be billed \$ 3.50 If you filed a paper filing, please print out the form now and either mail/fax to the state. Paper filings are not submitted to states via the system

[Create Another Filing](#)

From: Beverly Monroe <bmonroe@researchunderwriters.com>  
Subject: FW: Amigo Taxi Llc CA20651P2016  
Date: November 30, 2016 4:00:35 PM EST  
To: "Cory A. Leshner" <cal@coryleshner.com>  
Cc: Patti Diskin <pdiskin@researchunderwriters.com>

3 Attachments, 123 KB

Cory, attached please find a copy of the Form E that has been submitted to the PUC. Clearly this was an oversight on the part of Atlas, this is effective the date of your policy, 10/27/16.

I hope this will suffice in answering the complaint. If you need anything else, please don't hesitate to call.

**Beverly Monroe | Account Manager**  
Research Underwriters  
4240 Greensburg Pike | Pittsburgh, PA 15221  
ph: 412-351-5800 ext. 105 | fax: 412-351-5818



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**From:** Nevels, Trae [mailto:tnevels@atlas-fin.com]  
**Sent:** Wednesday, November 30, 2016 3:55 PM  
**To:** Beverly Monroe <bmonroe@researchunderwriters.com>  
**Subject:** Amigo Taxi Llc

**Trae Nevels**  
Production Underwriter  
Atlas Financial Holdings, Inc.  
150 Northwest Point Blvd.  
Elk Grove Village, IL 60007

Main: 847.472.6700  
Direct: 847.700.8323  
Fax: 847.952.4825  
[tnevels@atlas-fin.com](mailto:tnevels@atlas-fin.com)

[Website](#) | [Investor Relations](#) | [About Us](#)

**THE ATLAS GROUP OF COMPANIES**

American Country Insurance Company | American Service Insurance Company, Inc.  
Gateway Insurance Company | Global Liberty Insurance Company of New York

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[Form E Filing.pdf \(70 KB\)](#)

**VERIFICATION**

I, Maher S. Ahmed, Business Manager of Amigo Taxi, LLC, hereby verify that the statements made in the foregoing Answer are true and correct to the best of my knowledge, information and belief. I understand that the statements in the foregoing document are made subject to the penalties of 18 Pa.C.S. §4909 relating to unsworn falsification to authorities.

12/2/2016  
Date

  
\_\_\_\_\_  
Maher S. Ahmed  
Business Manager  
Amigo Taxi, LLC  
2304 Walnut Street  
Harrisburg, PA 17103

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing Answer on this date to each party listed below via the following means:

**Via US Mail:**

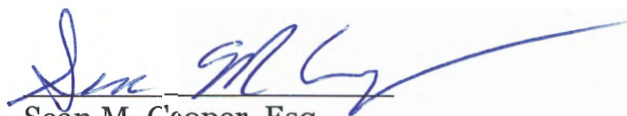
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Via E-mail:**

Michael L. Swindler, Deputy Chief Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[RA-PCCmplntResp@pa.gov](mailto:RA-PCCmplntResp@pa.gov)

Date: 12/2/2016

Respectfully submitted,



Sean M. Cooper, Esq.  
ID# 320940  
620 South 13th Street  
Harrisburg PA 17104  
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F: 855.559.5291  
[Sean@cooperlawpa.com](mailto:Sean@cooperlawpa.com)