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Charles L. Consagra
Richard F. Goldenziel
Danielle M. Ross

August 28, 2017

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street 2nd Floor
Harrisburg, PA 17120

RE: PUC
VS: Nasser Limousine, LLC
Docket No. C-2017-2610579

RECEIVED

AUG 28 2017

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dear Ms. Chiavetta:

Please be advised, this office represents Nasser Limousine, LLC in the above-referenced matter. Enclosed herewith please find Answer to the Complaint.

Very truly yours,


Needle Law, P.C.
Gregory J. Pascale, Esq.

GJP/mv

enc

cc: Michael L. Swindler, Deputy Chief Prosecutor (w/enc)
Via e-mail to: RA-PCCmplntResp@pa.gov
cc: Client (w/enc)

p.s. Please return a filed copy in env. enclosed.

RECEIVED

AUG 28 2017,

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
BUREAU OF INVESTIGATION AND ENFORCEMENT	:	
V.	:	Docket No. C-2017-2610579
NASSER LIMOUSINE LLC	:	
4751 BIRNEY AVE	:	
MOOSIC PA 18507	:	
.....	:	

ANSWER TO COMPLAINT

AND NOW, comes the Nasser Limousine, LLC by and through its attorneys, Needle Law, P.C., and hereby bring answer the Complaint as follows:

1. Admitted.
2. Admitted.
3. After reasonable investigation, the Defendant does not have adequate information to either admit or deny the allegations set forth in Paragraph 3 of Plaintiff's Complaint and the allegations are therefore specifically denied and strict proof thereof is demanded.
4. Admitted.
5. Admitted in part, denied in part. It is admitted that respondent has in its fleet to either admit or deny the allegations set forth in Paragraph 5 of Plaintiff's Complaint. It is specifically denied these two vehicles, Numbers 7 and 22, have a seating capacity of 11 passengers, excluding the driver. Strict proof thereof is demanded.. On the contrary, the two vehicles, 7 and 22, have a seating capacity of 10 passengers, excluding the driver, as the right front passenger seats precluded under Pennsylvania Utility Commission law from carrying a passenger. By way of further answer, the two vehicles in question have been inspected by the Pennsylvania Utility Commission on literally hundreds of occasions and passed. The Respondent will produce 11 years worth of PUC inspections on these two vehicles where no violation was found. It is admitted that trips utilizing these two vehicles

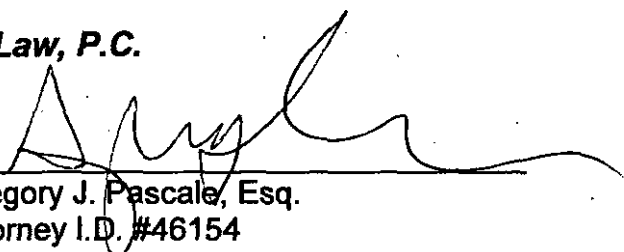
on ten days during the time period April 28, 2017 and June 10, 2017 occurred. It is admitted Respondent does not have authority to provide transportation for groups of 11-15 passengers. It is specifically denied at any time during the period in question, including the 10 days identified between April 28, 2017 and June 10, 2017, that more than 10 passengers, excluding the drivers, utilized the vehicles. By way of further answer, Nasser Limousine Service, LLC stopped using the vehicles after June 16, 2017 after receiving the letter attached hereto as Exhibit 'A'.

6. Denied. It is specifically denied the Respondent provided transportation in a service type not authorized by the Commission and is in violation of 56 Pa.C.S. §1102. By way of further answer, a fine of \$1,000 per day of violation is excessive, given the fact that the two vehicles were inspected hundreds of times by PUC officials over the past 11 years with no violations issued.

WHEREFORE, Respondent respectfully requests that the Complaint be denied and dismissed with prejudice.

Respectfully submitted,

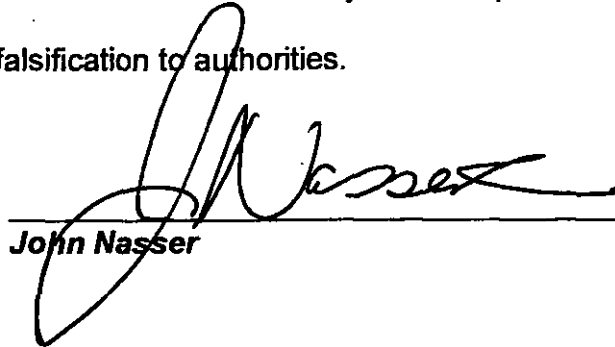
Needle Law, P.C.


By: Gregory J. Pascale, Esq.
Attorney I.D. #46154

240 Penn Avenue
Scranton, PA 18503
(570) 344-1266

John Nasser, deposes and says that he is the sole Member of Nasser Limousine, LLC, and that as such he is authorized to execute this Affidavit on its behalf, and that the facts set forth in the foregoing document, are true and correct to the best of his knowledge, information and belief.

I understand that this statement is made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.



John Nasser

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION :
BUREAU OF INVESTIGATION AND ENFORCEMENT :
V. : Docket No. C-2017-2610579
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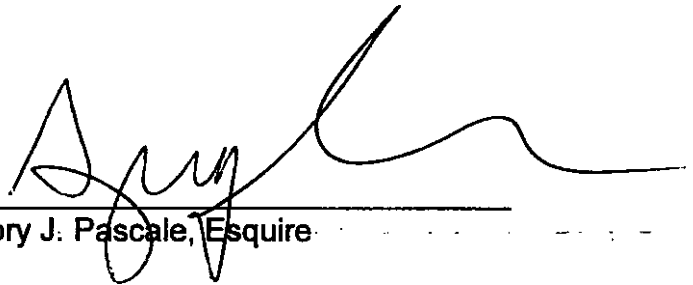
CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that Gregory J. Pascale, Esquire, did serve a true and correct copy of **Answer to Complaint** in the above-captioned matter by Express Mail, addressed as follows:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA 17120

with copy via e-mail to: RA-PCCmplntResp@pa.gov to

Michael L. Swindler, Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission



Gregory J. Pascale, Esquire

Dated: August 28, 2017

ORIGIN ID:AVPA (570) 344-1266
GREGORY J. PASCALE, ESQUIRE
NEEDLE LAW P.C.
240 PENN AVENUE
2ND FLOOR
SCRANTON, PA 18503
UNITED STATES US

SHIP DATE: 28AUG17
ACTWGT: 1.00 LB
CAD: 9275051/NET3920

BILL SENDER

TO ROSEMAR CHIAVETTA
PA PUBLIC UTILITY COMMISSION
400 NORTH STREET
2ND FLOOR
HARRISBURG PA 17120

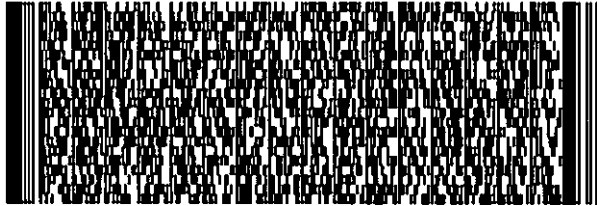
(800) 692-7380

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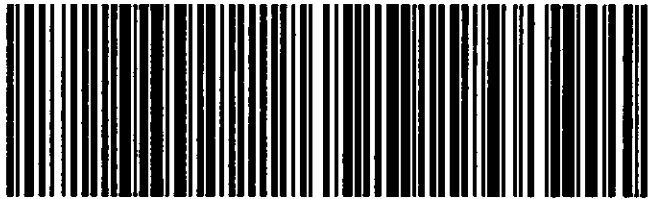
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