



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

May 16, 2018

VIA ELECTRONIC FILING

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

Re: Pennsylvania Public Utility Commission, Bureau of Investigation and
Enforcement v. Integrated Medical Transport, LLC
Docket No. C-2018-2601225
(**Certificate of Satisfaction**)

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Certificate of Satisfaction of the Bureau of Investigation and Enforcement and Integrated Medical Transport, LLC in the above-captioned matter. Copies have been served on the parties of record in accordance with the Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Myers", written in a cursive style.

Kourtney L. Myers
Prosecutor
PA Attorney ID No. 316494

Prosecutor for the Bureau of
Investigation and Enforcement

Enclosure

cc: As per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2018-2601225
	:	
Integrated Medical Transport, LLC,	:	
Respondent	:	

CERTIFICATE OF SATISFACTION

Pursuant to Section 5.24(a) of the Commission’s regulations, 52 Pa. Code § 5.24(a), the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Investigation and Enforcement (“I&E”) and Integrated Medical Transport, LLC (“Respondent”) submit this Certificate of Satisfaction to certify that the above-captioned Formal Complaint filed by I&E against Respondent has been satisfied.

On January 23, 2018, I&E filed a Complaint at the above docket alleging that Respondent violated Sections 32.2 and 32.11 of the Commission’s regulations, 52 Pa. Code §§ 32.2 and 32.11, for failing to timely file evidence of liability insurance with the Commission and Section 501(c) of the Public Utility Code, 66 Pa.C.S. § 501(c), by permitting its vehicles to be operated while its Certificate of Public Convenience (“Certificate”) was under suspension. I&E sought payment of a civil penalty in the amount of \$3,000 and cancellation of Respondent’s Certificate.

On March 26, 2018, Respondent filed its Answer with New Matter at the above docket and disputed and/or disagreed with some or all of I&E’s factual and legal allegations. Respondent also attached, as an exhibit to its New Matter, proof of liability insurance regarding the alleged lapse period in Respondent’s insurance coverage. Upon review of such documentation, I&E determined that while Respondent failed to cause its insurer to timely file evidence of liability insurance with the Commission and operated while its Certificate was under suspension, those alleged violations are mitigated by the fact that there was no lapse in Respondent’s insurance coverage for the time period at issue in the above-docketed Complaint.

On May 10, 2018, the Commission received a cashier’s check from Respondent in the amount of \$1,500, which constitutes payment of the agreed-upon civil penalty sought

by I&E regarding the allegations that Respondent failed to timely file evidence of liability insurance with the Commission in violation of 52 Pa. Code §§ 32.2 and 32.11 and permitted its vehicles to be operated while its Certificate was under suspension in violation of 66 Pa.C.S. § 501(c).

I&E and Respondent agree that this payment was remitted solely for the purposes of amicably resolving any and all matters related to the Formal Complaint. Nothing contained in this Certificate of Satisfaction may be used or construed by any person as an admission of any fact or liability by Respondent. Moreover, this Certificate of Satisfaction is made without any admission against, or prejudice to, any position which I&E or Respondent may adopt during any subsequent administrative or court proceeding of whatever nature.

The above-captioned Formal Complaint should be deemed satisfied and the Commission's files closed.

Respectfully Submitted,

Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement

By: 

Kourtney L. Myers
Prosecutor

Bureau of Investigation and Enforcement
P.O. Box 3265
Harrisburg, PA 17105
717.705.4366
komyers@pa.gov

Date: 5/16/18

Integrated Medical Transport, LLC

By: 

Charles E. Thomas, III, Esquire
Thomas, Niesen & Thomas, LLC
212 Locust Street
Suite 302
Harrisburg, PA 17101
cet3@tntlawfirm.com

*Counsel for Integrated Medical
Transport, LLC*

Date: 5/15/18

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement

v.

Integrated Medical Transport, LLC

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Docket No. C-2018-2601225

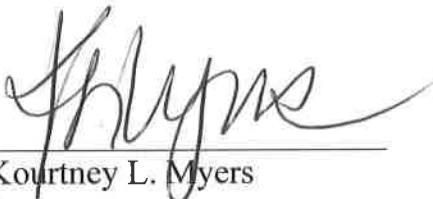
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Notification by First Class Mail and Electronic Mail:

Charles E. Thomas, III, Esquire
Thomas, Niesen & Thomas, LLC
212 Locust Street
Suite 302
Harrisburg, PA 17101
cet3@tntlawfirm.com

Counsel for Integrated Medical Transport, LLC



Kourtney L. Myers
Prosecutor
PA Attorney ID No. 316494

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Bureau of Investigation and Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265
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komyers@pa.gov

Dated: May 16, 2018