



August 8, 2018

Secretary, PA Public Utility Commission  
PO BOX 3265  
Harrisburg, PA 17105-3265

RECEIVED  
2018 AUG 10 AM 10:49  
PA PUC  
SECRETARY'S BUREAU

CASE DOCKET NUMBER(S) C-2018-2644939  
A-6415307 **A-2612-2336066**

(1) My name is Michael E. Cohen of The Brockton Group d/b/a Molly's Trolleys. We sold this business on May 2, 2018 to Suz Group LLC.

I am responding to the letter dated July 23, 2018 from Rosemary Chiavatta, Secretary, Pennsylvania Public Utility Commission. I thought this was a closed matter, and I am befuddled as to why I even received this letter? Here we go again, with what happened.....

At 11pm on 12/31/2017, we permanently shut the business down, we had our insurance policy cancel on 01/03/2018 and chose not to renew. The license plates were removed and this business did not carry anyone for hire after 12/31/2017 or for that matter, the vehicles were never moved from the indoor garage that they were stored at after 12/31/17 until they were sold on May 2, 2018 to a new owner. At no time did any unscrupulous activity take place or was public safety every compromised.

I responded to the 02/13/18 PUC complaint against my business electronically on March 5, 2018 at 8am and then again on March 8, 2018 at 10:12 am. I have included the letters that were part of the electronic complaint and in addition the letters were also mailed via USPS to: David Loucks, Chief Motor Carrier Enforcement and Michael Swindler, Deputy Chief Prosecutor. I have also included electronic receipts in this letter. I am not sure what I can say to you to explain what we did and how we did it. Again, we closed the business on the eve of 12/31/17, license plates were removed, we had no passengers for hire after 12/31/17, and the vehicles were stored inside in a private building. The business name "goodwill" and the vehicles were sold to Sue Joseph of a newly formed LLC called Suz Group LLC and the closing took place on May 2, 2018.

(2) Copy of March 8, 2018 electronic receipt answer to complaint on March 8, 2018 at 10:12:27 AM and a copy of the electronic receipt answer to complaint on March 5, 2018 at 8:00am.



- (3) Copy of my email to Mr. Swindler on 03/03/18 referencing that I spoke to Cathy Royer at PUC Bureau of Enforcement on Friday, February 23 and then again on Wednesday, February 28.
- (4) Copy of my 02/28/18 letter to David W. Loucks, Chief Motor Carrier Enforcement
- (5) Copy of my 02/28/18 letter to Michael Swindler, Deputy Chief Prosecutor Bureau of Investigation and Enforcement
- (6) Please note the postmark of this letter will prove that the PUC would have received my reply within your 20 day window.

I, Michael E. Cohen, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a 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).

Sincerely,

Michael E. Cohen  
The Brockton Group d/b/a  
Molly's Trolleys  
6 Oakville Dr  
Pittsburgh, PA 15220-3222  
Direct cell: 412-906-0170  
Direct email: mollys.michael@gmail.com



February 28, 2018

ATTN: David W. Loucks, Chief  
Motor Carrier Enforcement  
Bureau of Investigation and Enforcement  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
PO BOX 3265  
Harrisburg, PA 17105-3265

RE: C-2018-2644939

Dear Mr. Loucks:

I am writing to you in reference to Docket No. C-2018-2644939 dated 02/13/18. We ceased operating full operations of our business on December 31, 2017 and our business insurance policy expired on 01/03/2018. We did not renew the insurance policy.

Our vehicles have been stored inside a building that we own and the address is: 1400 Nixon Street, Pittsburgh, PA. The vehicle license plates and vehicle registrations were removed and returned. The vehicles have not moved from this building since the evening of 12/31/2017.

We are in the process of selling our business to a new owner and that we hope the deal closes sometime in mid to late March 2018. The new owner will be responsible for setting up their own PUC Account and meeting the criteria of a new applicant. I am assuming our PUC Account cannot be transferred at all? Once the new owner establishes insurance for the vehicles, only then will they be moved out of my building.

The whole process of having an existing PUC Account and terminating our business operations, along with trying to sell our business, is brand new to my business partner and me. Whatever we need to do to facilitate the transfer to a new owner in conjunction with the PUC, we will do.

Sincerely,

*Michael*

Michael Cohen

Direct Cell: 412-906-0170 & Direct Email: [duckytours@aol.com](mailto:duckytours@aol.com)

RECEIVED  
2018 AUG 10 AM 10:49  
PA PUC  
SECRETARY'S BUREAU



February 28, 2018

ATTN: Mr. Michael L. Swindler, Deputy Chief Prosecutor  
Bureau of Investigation and Enforcement  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
PO BOX 3265  
Harrisburg, PA 17105-3265

RE: C-2018-2644939

Dear Mr. Swindler:

I am writing to you in reference to Docket No. C-2018-2644939 dated 02/13/18. We ceased operating full operations of our business on December 31, 2017 and our business insurance policy expired on 01/03/2018. We did not renew the insurance policy.

Our vehicles have been stored inside a building that we own and the address is: 1400 Nixon Street, Pittsburgh, PA. The vehicle license plates and vehicle registrations were removed and returned. The vehicles have not moved from this building since the evening of 12/31/2017.

We are in the process of selling our business to a new owner and that we hope the deal closes sometime in mid to late March 2018. The new owner will be responsible for setting up their own PUC Account and meeting the criteria of a new applicant. I am assuming our PUC Account cannot be transferred at all? Once the new owner establishes insurance for the vehicles, only then will they be moved out of my building.

The whole process of having an existing PUC Account and terminating our business operations, along with trying to sell our business, is brand new to my business partner and me. Whatever we need to do to facilitate the transfer to a new owner in conjunction with the PUC, we will do.

Sincerely,

*Michael*

Michael Cohen

Direct Cell: 412-906-0170 & Direct Email: duckytours@aol.com

RECEIVED  
2018 AUG 10 AM 10:49  
PA PUC  
SECRETARY'S BUREAU



# PENNSYLVANIA

[INFO](#)

[&INDUSTRY](#)

[&RESOURCES](#)

[PUC](#)

[US](#)

[Log Off eFiling](#)

[Contact Us](#)

[Search](#)

- [My Filings](#)
- [New Filing](#)
- [Modify Account](#)
- [POR Search](#)
- [eService Directory](#)
- [Subscriptions](#)
- [Technical Assistance](#)
- [eFiling FAQs](#)
- [Log Off](#)

## eFiling Summary



Below is a summary of the information you entered for this filing. Please review this information for accuracy and click the "Submit eFiling" button to continue. **An additional dialog box will then appear asking you to confirm the submission.** Fees associated with the filing can be paid by check, money order or online via a secure payment page after the filing is submitted.

Docket Number:	C-2018-2644939
Description:	ANSWER TO COMMISSION COMPLAINT

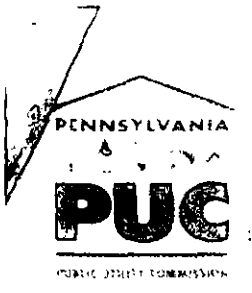
### Uploaded File List

<b><u>MOLLY'S PUC COMPLAINT</u></b> <b><u>02.28.18.pdf</u></b>	Communication	Answer to Commission Complaint	3/8/2018 10:12:27 AM
---	---------------	--------------------------------------	-------------------------

**For filings exceeding 250 pages**, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, P.O. Box 3265, Harrisburg, PA a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

**No paper submission is necessary for filings under 250 pages.**

Customer Hotline 1-800-692-7380 | PUC Webmaster | Privacy Policy



# PENNSYLVANIA

[INFO](#)

[& INDUSTRY](#)

[& RESOURCES](#)

[PUC](#)

[US](#)

[Log Off eFiling](#)

[Contact Us](#)

[Search](#)

- [My Filings](#)
- [New Filing](#)
- [Modify Account](#)
- [POR Search](#)
- [eService Directory](#)
- [Subscriptions](#)
- [Technical Assistance](#)
- [eFiling FAQs](#)
- [Log Off](#)

## eFiling Successfully Transmitted

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

**Print this page for your records.**



Representing:	THE BROCKTON INC. DBA MOLLY'S TROLLEYS
Description:	
Transmission Date:	3/3/2018 12:11:21 PM
Filed On:	3/5/2018 8:00:00 AM
eFiling Confirmation Number:	1711184

### Uploaded File List

MOLLY'S PUC COMPLAINT 02.28.18.pdf	Formal Complaint	Formal Complaint
MOLLY'S PUC COMPLAINT 02.28.18.pdf	Communication	Answer to Formal Complaint

For filings exceeding 250 pages, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the

paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, P.O. Box 3265, Harrisburg, PA a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

**No paper submission is necessary for filings under 250 pages.**

*You can view a record of this filing and previous filings you have submitted to the PUC by clicking the My Filings link in the left navigation menu.*

Customer Hotline 1-800-692-7380 | PUC Webmaster | Privacy Policy

© PUC All Rights Reserved

Logout

From: **Michael** gucky@bcs.net  
Subject: Docket No. C-2018-2644939  
Date: March 3, 2018 at 12:23 PM  
To: RA-PUCCompln:Resp@pa.gov

Dear Mr. Swindler:

Per the Complaint instructions, I have emailed a copy of this letter on the website and also one to your office. I have spoken to Cathy Royer at the PUC Bureau of Enforcement regarding this matter on Friday, February 23 and again on Wednesday, February 28.

If I can be of further assistance, please contact me via email: or my Direct Cell: 412-906-0170.

Sincerely,

*Michael*

Michael Cohen  
Co-Owner  
The Brockton Group, Inc.  
d/b/a Molly's Trolleys

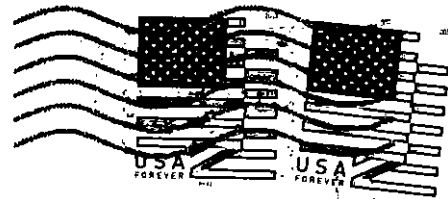
MOLLY'S PUC  
COMP...8.docx



842 Jacksonia Street • Pittsburgh, PA 15212

PITTSBURGH PA 150

08 AUG 2018 PM 5 L



Secretary, PA PUC

PO BOX 3265

HARRISBURG, PA 17105-3265

17105-326565

