

Keystone CAB Services, Inc..

2304 Walnut Street  
Harrisburg, PA 17103  
T: (717) 773-5452

**VIA US MAIL**

May 27, 2019

Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
PO BOX 3265  
Harrisburg, PA 17105-3265

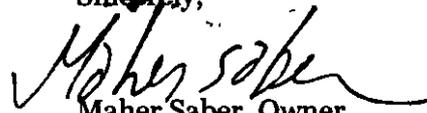
RE: Bureau of Investigation and Enforcement ("BIE") v. Keystone Cab Services, Inc.;  
Docket No. C-2019-3004891

Dear Secretary Chiavetta,

Please find enclosed an original and one (1) copy of an Answer with New Matter in the above referenced matter. Please docket the original and time stamp and return the copy to me in the enclosed self-addressed stamped envelope.

Thank you for your time and consideration. Please feel free to contact me with any questions or concerns.

Sincerely,



Maher Saber, Owner  
Keystone Cab Services, Inc.

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2019 MAY 29 AM 10:11

PA P.U.C.  
SECRETARY'S BUREAU

BEFORE THE  
PENNSYLVANIA  
PUBLIC UTILITY  
COMMISSION

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SECRETARY'S BUREAU

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PENNSYLVANIA PUBLIC  
UTILITY COMMISSION  
BUREAU OF INVESTIGATION  
AND ENFORCEMENT

V.

KEYSTONE CAB SERVICE,  
INC.  
2304 A WALNUT STREET  
HARRISBURG, PA 17103

DOCKET NO. C-2019-3004891

**ANSWER WITH NEW MATTER**

AND NOW comes Keystone Cab Service, Inc., and files the following Answer with New Matter to the Complaint filed by the Bureau of Investigation and Enforcement, and in support thereof, avers the following:

1. Admitted.
2. Denied. The Respondent was issued a certificate of public convenience by the Commission on May 23, 2002 at Application Docket No. A-00118552.
3. Denied. Respondent is without sufficient information to confirm or deny whether a complaint was received and so the same is denied.
4. Admitted in part and denied in part. It is admitted that Officer Griffith spoke with Mr. Leshner and Mr. Leshner provided the driver's logs and contact information. The remainder of the averment is denied because Respondent is without information relating to the same.

5. Denied. This averment is a conclusion of law to which no response is required. To the extent a response is required, Respondent denied that a violation occurred.

WHEREFORE, based upon the foregoing, Respondent Keystone Cab Service, Inc. respectfully requests that the Commission Dismiss the Complaint.

**New Matter**

6. Averments 1-5 are hereby incorporated and restated as though set forth here at length.

7. Respondent has not been provided with a copy of the informal complaint referred to in the Complaint.

8. The driver named in the Complaint, Carl Carter, Jr., did not operate a taxi owned by Respondent during the relevant period.

WHEREFORE, based upon the foregoing, Respondent Keystone Cab Service, Inc. respectfully requests that the Commission Dismiss the Complaint.

Respectfully Submitted,



Maher Saber, Owner

Keystone Cab Services, Inc.

2304 A Walnut Street

Harrisburg, PA 17103

717-773-5452

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PA P.U.C.  
SECRETARY'S BUREAU

VERIFICATION

I, Maher Saber, 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 any 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.

Date: 5/27/19



Maher Saber, Owner  
Keystone Cab Services, Inc.

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**BEFORE THE  
PENNSYLVANIA  
PUBLIC UTILITY  
COMMISSION**

2019 MAY 29 AH 10: 12

PA P.U.C.  
SECRETARY'S BUREAU

PENNSYLVANIA PUBLIC  
UTILITY COMMISSION  
BUREAU OF INVESTIGATION  
AND ENFORCEMENT

V.

KEYSTONE CAB SERVICE,  
INC.  
2304 A WALNUT STREET  
HARRISBURG, PA 17103

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DOCKET NO. C-2019-3004891

**CERTIFICATE OF SERVICE**

Pursuant to the Commission's Rules of Procedure, I hereby certify that on this 27th day of May 2019, I served the following parties with the foregoing Answer with New Matter via the means listed below:

**Via First Class Mail:**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

Michael L. Swindler, Deputy Chief  
Prosecutor  
Bureau of Investigation and  
Enforcement  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

Date: May 27, 2019

Respectfully Submitted,



Maher Saber  
Keystone Cab Services, Inc.  
717-773-5452

Keystone Cab Services, Inc  
2304 Walnut St.  
Harrisburg, PA 17103



Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

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