

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION, BUREAU OF	:	
INVESTIGATION AND ENFORCEMENT	:	
	:	
V.	:	Docket No. C-2020-3016865
	:	
REGENCY TRANSPORTATION GROUP,	:	
LTD.	:	

ANSWER TO COMPLAINT

AND NOW, Comes the Respondent, Regency Transportation Group, Ltd., by and through its attorneys, Vuono & Gray, LLC, and files the following Answer to Complaint:

1. The averments of paragraph 1 are admitted in part and denied in part. It is admitted that the broker of passenger's authority issued to Respondent was under suspension effective January 18, 2020 for failure to maintain evidence of bond insurance on file with the Commission. By way of further response, Respondent filed evidence of insurance in the form of a new bond on or about February 14, 2020, within twenty (20) days from the service of the Complaint (January 29, 2020), with an insurance effective date of January 18, 2020, the date that the authority was suspended.

2. The averments of paragraph 2 are admitted.

3. The averments of paragraph 3 are admitted.

4. The averments of paragraph 4 are denied. To the contrary, Respondent promptly addressed the insurance lapse issue and filed evidence of insurance in the form of a new bond on or about February 14, 2020, within twenty (20) days from the filing of

the Complaint. The remaining averment of paragraph 4 are legal conclusions to which no response is required. By way of further response, the proposed civil penalty for the alleged violation is inappropriate where Respondent has timely complied with Commission requirements by evidence of insurance in the form of a new bond on or about February 14, 2020, within twenty (20) days from the filing of the Complaint.

5. The averments of paragraph 5 are legal conclusions to which no response is required.

WHEREFORE, the proposed civil penalty for Respondent's alleged violation should be denied.

Respectfully submitted,

VUONO & GRAY, LLC

By: 
William H. Stewart III, Esq.
Attorney for
Regency Transportation Group, Ltd.
Respondent

VUONO & GRAY, LLC
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Dated: March 6, 2020

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer to Complaint has been eFiled and served on the following party:

Michael L. Swindler, Deputy Chief Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North St.
Harrisburg, PA 17120



William H. Stewart III, Esq.
PA ID No. 209490

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.



William H. Stewart III, Esq.
PA ID No. 209490