



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

February 24, 2021

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement v.  
Pasha Luxury Services, Inc. t/a The Corporate Sedan Service  
Docket No. C-2019-3012562  
**I&E Exhibits**

Dear Secretary Chiavetta:

Enclosed for electronic filing is the Bureau of Investigation and Enforcement's ("I&E") **Exhibits** in the above-referenced 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 over a light blue horizontal line.

Kourtney L. Myers  
Prosecutor  
Bureau of Investigation & Enforcement  
PA Attorney ID No. 316494  
[komyers@pa.gov](mailto:komyers@pa.gov)

KLM/ac  
Enclosures

cc: Honorable Darlene D. Heep  
Pamela McNeal, OALJ  
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-2019-3012562
	:	
Pasha Luxury Services, Inc.	:	
t/a The Corporate Sedan Service,	:	
Respondent	:	

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**EXHIBITS OF THE  
BUREAU OF INVESTIGATION AND ENFORCEMENT**

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**TO ADMINISTRATIVE LAW JUDGE DARLENE D. HEEP:**

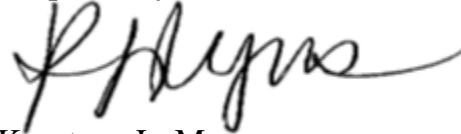
Pursuant to the Prehearing Order dated January 19, 2021 of the presiding Administrative Law Judge, enclosed please find a copy of the exhibits that the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) intends to present at the initial telephonic hearing in the above-docketed matter, which is scheduled for Wednesday, March 3, 2021, at 10:00 a.m.

I&E proposes to present the following exhibits:

1. Instructions for Preparing 2016 Assessment Report for Motor Carriers and a blank 2016 Assessment Report;
2. Pasha Luxury’s General Assessment Invoice for Fiscal Year July 1, 2017 to June 30, 2018;
3. Notice of Assessment for Fiscal Year July 1, 2017 to June 30, 2018;
4. Electronic Signature of Pasha Luxury indicating receipt of the General Assessment Invoice for Fiscal Year July 1, 2017 to June 30, 2018 and the Notice of Assessment for Fiscal Year July 1, 2017 to June 30, 2018;

5. November 8, 2017 Dunning Letter from the Commission's Fiscal Office;
- 6A. A Formal Complaint filed by I&E against Pasha Luxury on July 26, 2016 at Docket No. C-2016-2558533;
- 6B. A Certificate of Satisfaction filed by I&E on July 5, 2017 in satisfaction of I&E's Formal Complaint at Docket No. C-2016-2558533;
- 7A. A Formal Complaint filed by I&E against Pasha Luxury on December 13, 2017 at Docket No. C-2017-2638061; and
- 7B. A Certificate of Satisfaction filed by I&E on April 3, 2019 in satisfaction of I&E's Formal Complaint at Docket No. C-2017-2638061.

Respectfully submitted,



Kourtney L. Myers

Prosecutor

PA Attorney ID No. 316494

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(717) 705-4366  
[komyers@pa.gov](mailto:komyers@pa.gov)

Date: February 24, 2021

# I&E Exhibit 1

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**INSTRUCTIONS FOR PREPARING 2016 ASSESSMENT REPORT FOR MOTOR CARRIERS**

You must report your gross intrastate operating revenue for calendar year 2016 on the 2016 Assessment Report, which is enclosed. You are required to sign, notarize, and file the 2016 Assessment Report with the Commission on or before March 31, 2017. Please use the self-addressed return envelope enclosed. **THE PUC WILL NOT GRANT AN EXTENSION OF TIME TO FILE THIS REPORT.**

**WHO MUST FILE:** All common carriers certificated by the Commission. Common Carriers include property carriers, passenger carriers, and household goods carriers. Carriers subject to the UCR Act must file this Report, even though qualified UCR operations of carriers registered under the UCR Act will not be assessed.

**WHAT YOU MUST FILE:** Assessment Report (Form AR-16-MC) must be completed in its entirety in order to be accepted as final. This includes signatures and notarization along with receipt in the Commission's Assessment Section on or before March 31, 2017. **This report form may not be modified.** Please be sure to include a valid telephone number for the contact person to answer questions, if necessary. The following are addresses for the Assessment Section of the PUC.

**Mailing Address:**

Regular Mail: Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA, 17105-3265

Express Mail: Pa. Public Utility Commission  
400 North Street  
Harrisburg, PA, 17120

**NAME AND ADDRESS:** Verify that the preprinted name and address are correct. If this is not correct, cross out and print the correct information. Please provide an email address and the current telephone number.

**LINE-BY-LINE INSTRUCTIONS**

*Line 1. Pennsylvania Gross Intrastate Operating Revenue.*

Report Pennsylvania gross intrastate operating revenue here. This is earned revenue from your public utility operations gross within the boundaries of the Commonwealth of Pennsylvania, without deduction of expenses of any kind. Fuel surcharges must be included as revenue. Revenue must be reported in the appropriate column. For example, if all of your revenue was from the transportation of property, you must report all revenue in the 'property' column. If your revenue was from 2 or more types of common carriage, you must report the amount of revenue received from each type, in the appropriate column.

Revenue earned from service under the jurisdiction of the Philadelphia Parking Authority must be reported as exempt revenue.

*Line 2. Pennsylvania Exempt Intrastate Revenue Total.*

Report Exempt Intrastate Revenue here. You must itemize any exemptions on the "Exempt Intrastate Revenue" lines on the Report. Attach additional sheets of paper as needed for explanation of exemptions. The PUC may disallow your exemptions if you fail to itemize. Total all exempt revenue on Line 2.

*Line 3. Pennsylvania Net Intrastate Operating Revenue.*

Subtract Line 2 from Line 1.

**UCR REGISTRATION INFORMATION**

You must check the appropriate box. If you are an interstate carrier and required to register under the UCR Program, you must check 'yes' and provide your U.S. DOT number. For the purposes of this report, INTERSTATE operating revenue refers to revenue earned from the transportation of property or persons between points of origin and destination, either or both of which are outside Pennsylvania.

Further information on the UCR Program may be found at [www.ucr.in.gov](http://www.ucr.in.gov)

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ASSESSMENT INQUIRIES: Assessment Section-(717)265-7548  
UCR INQUIRIES: B. I. E.-(717)783-3846

## EXEMPT REVENUE

The following is a description of Exempt Revenue you may deduct on Line 2, as provided by 66 Pa.C.S. §102:

1. **LEASE REVENUE** – You may deduct lease revenue. Lease revenue is revenue a certificated carrier (lessor) receives when it leases its equipment to another certificated carrier (lessee). The lessor carrier cannot retain any responsibility for the maintenance, supervision or control of the vehicle. The leasing arrangement must be in compliance with the Commission’s leasing regulations, which are found at 52 Pa. Code sections 29.101 (passenger carrier leasing) and 31.32 (property and household carrier leasing). The lessor must include in its assessment report the name(s) of the carrier(s) and the certificate of public convenience number to which it leases its equipment and the amount of revenue received from the carrier. Lessees cannot use rental/lease fees paid to the lessor to offset operating revenue and must report, for assessment purposes, all revenues earned under their certificate of public convenience.
2. **TRANSPORTATION OF K-12 SCHOOL CHILDREN** – You may deduct revenue you received from a kindergarten through 12<sup>th</sup> grade public, private or parochial school for the transportation of schoolchildren for school purposes or school sponsored extra-curricular activities, under a bona fide transportation contract with a public, private or parochial school.
3. **TRANSPORTATION OF AGRICULTURE PRODUCTS** – Farm owners and operators may deduct revenue from transporting their own agricultural products from, or farm supplies to, their farm. In addition, independent contractors or cooperative agricultural associations, transporting agricultural products or farm supplies exclusively for one or more farm owner(s) or operator(s), may deduct that revenue.
4. **WASTE, EXCAVATED AND ROAD CONSTRUCTION MATERIALS** – You may deduct revenue you received from transporting ashes (including anti-skid, flue dust and fly ash), rubbish and waste for disposal. The PUC also allows the exemption/deduction of any revenue you received for transporting excavated materials in dump trucks. The purpose of the excavation is to create a hole or cavity. Removing material of value for use elsewhere is NOT exempt. The PUC also allows the exemption/deduction of any revenue you received for transporting road construction materials if a dump truck is used, and the materials hauled are used solely in a private or public road project including driveways (but NOT parking lots), and the materials are hauled directly to road construction sites or stockpiles. Carriers may **not** claim a revenue exemption for waste, excavated and road construction material when those materials were transported in five-axle tractor-trailers.
5. **TRANSPORTATION OF YOUR OWN PROPERTY**- You may deduct revenue you received from transporting your own property to yourself or to those that buy directly from you.
6. **VOTING MACHINES** – You may deduct revenue you received from transporting voting machines to and from polling places on behalf of any political subdivision of the Commonwealth for use in any primary, general or special election.
7. **TRANSPORTATION OF WOOD PRODUCTS FROM WOODLOTS**- You may deduct revenue you received from transporting pulpwood, chemical wood, saw logs, wood chips, or veneer logs solely from woodlots. A woodlot is an area devoted to growing forest trees. Any revenue received from transportation performed from sources other than the woodlots is subject to assessment and may not be deducted.
8. **TRANSPORTATION OF WRECKED OR DISABLED VEHICLES** – You may deduct revenue you received from the transportation of wrecked or disabled motor vehicles from an accident, breakdown, or a place the vehicle was transported after the accident or breakdown, if it is subsequently transported for repair. Revenue from transportation of wrecked or disabled vehicles to or from auctions is NOT exempt.
9. **TRANSPORTATION OF STOLEN OR REPOSSESSED VEHICLES**- You may deduct revenue you received from the transportation of stolen or repossessed vehicles. Revenue from transportation of stolen or repossessed vehicles to or from auctions is NOT exempt.
10. **TRANSPORTATION OF INJURED, ILL OR DECEASED PERSONS** – You may deduct revenue you received from transporting an injured or ill person to a health care facility, when that transportation is performed in an ambulance or a medically equipped vehicle containing portable oxygen. A medical attendant must be in the vehicle in addition to the driver. A health care facility includes a hospital, clinic, dialysis center, nursing care institution, home health agency, infirmary, or behavioral service provider. A doctor’s office is NOT a health care facility. In addition, you may deduct revenue you received from transporting deceased persons.
11. **TRANSPORTATION UNDER CONTRACT WITH MUNICIPAL CORPORATIONS** - You may deduct revenue you received from passenger transportation performed under contract with a municipal corporation, provided that: (1) the municipal corporation actively regulates your rates, routes and services; and (2) the transportation is limited to municipal residents. This deduction does not apply to contracts with state agencies.



COMMONWEALTH OF PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
PO BOX 3265  
HARRISBURG, PA 17105-3265

**2016 ASSESSMENT REPORT-MOTOR CARRIERS**

This Report **MUST BE FILED** not later than **MARCH 31, 2017**. Failure to file may result in fines up to \$1,000 for each day a violation continues (66 Pa. C.S. § 3301).

TRADE OR CORPORATE NAME OF UTILITY:	UTILITY CODE
CONTACT NAME:	EMAIL (Optional):
ADDRESS 1:	ADDRESS 2 (Floor, Suite, etc.):
CITY, STATE, ZIP:	PHONE NO.

**OPERATING REVENUE FOR CALENDAR YEAR 2016 (January 1, 2016-December 31, 2016)**  
(Enter WHOLE dollars only)

	PROPERTY	HOUSEHOLD GOODS	PASSENGER	
			Group and Party 16 or more	Passenger 15 and Under
<b>1. PA INTRASTATE OPERATING REVENUE</b>				
<b>PA EXEMPT INTRASTATE REVENUE</b>				
<b>A. #</b>				
<b>B. #</b>				
<b>C. #</b>				
<b>D. #</b>				
<b>2. TOTAL Exempt Revenue</b>				
<b>3. PA NET INTRASTATE OPERATING REVENUE (Subtract Line 2 from Line 1)</b>				

**UCR REGISTRATION INFORMATION**

2017 UCR Registered  YES  NO US DOT #: \_\_\_\_\_

**Internal Use Only**

A-1  C-1

«AddressType»

### AUTHORIZATION FOR RELEASE OF STATE TAX RECORDS

In accordance with Sections 505 and 506 of the Public Utility Code, as a means to verify the accuracy of financial information supplied to the Public Utility Commission, I hereby authorize the Pennsylvania Department of Revenue to release to the Public Utility Commission, any tax records filed or compiled with regard to the below-listed utility and/or individual.

\_\_\_\_\_  
Utility Name

\_\_\_\_\_  
Signature

Date \_\_\_\_\_

\_\_\_\_\_  
Name (Printed)

\_\_\_\_\_  
Title

#### AFFIDAVIT

I affirm that the information reported herein is complete, true and correct.

\_\_\_\_\_  
(Signature of Individual or Officer)

\_\_\_\_\_  
(Date)

READABLE (PRINT OR TYPE) NAME OF INDIVIDUAL or OFFICER ABOVE:

TELEPHONE NO.:

Office ( ) \_\_\_\_\_

Other ( ) \_\_\_\_\_

Other ( ) \_\_\_\_\_

#### NOTARIZATION

(Required)

Subscribed and sworn to before me this

\_\_\_\_\_ day of \_\_\_\_\_ 2017

\_\_\_\_\_  
NOTARY SIGNATURE

\_\_\_\_\_  
OFFICIAL TITLE

OFFICIAL SEAL

\_\_\_\_\_  
(Date My Commission Expires)

# I&E Exhibit 2



Commonwealth of Pennsylvania  
**Pennsylvania Public Utility Commission**  
Harrisburg, PA 17105-3265

INVOICE DATE	INVOICE NUMBER
9/5/2017	17-640997

FISCAL YEAR
July 1, 2017 to June 30, 2018

**GENERAL ASSESSMENT INVOICE**

PASHA LUXURY SERVICES INC  
67 BUCK ROAD SUITE 107  
HUNTINGDON VALLEY PA 19006

- Read Carefully Notice of Assessment
- Use Return Envelope Provided
- Make Check Payable to:  
Commonwealth of Pennsylvania

Pennsylvania Public Utility Commission	\$22,182.00
<b>PAY THIS AMOUNT WITHIN 30 DAYS</b>	\$22,182.00

TO RECEIVE PROPER CREDIT FOR YOUR  
PAYMENT, REMOVE THE BOTTOM PART OF  
THIS INVOICE AT THE PERFORATION AND  
RETURN WITH YOUR REMITTANCE

MAIL PAYMENT TO:
PA DOR PO BOX 61380 HARRISBURG, PA 17106-1380

FOLD AND CUT HERE

RETURN THIS PORTION WITH YOUR REMITTANCE

PASHA LUXURY SERVICES INC  
67 BUCK ROAD SUITE 107  
HUNTINGDON VALLEY PA 19006

INVOICE DATE	INVOICE NUMBER
9/5/2017	17-640997
FISCAL YEAR	
July 1, 2017 to June 30, 2018	

Pennsylvania Public Utility Commission	\$22,182.00
<b>PAY THIS AMOUNT WITHIN 30 DAYS</b>	\$22,182.00

17000064099731 0905171000221&20020000000000300000000000 0000221&2002

# I&E Exhibit 3

**PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17105-3265**

**NOTICE OF ASSESSMENT**

**EXPLANATION OF BILL FOR GENERAL ASSESSMENT  
FOR FISCAL YEAR JULY 1, 2017 TO JUNE 30, 2018**

In Section 510 of the Public Utility Code, 66 Pa. C.S. §510, the Pennsylvania General Assembly has authorized the Pennsylvania Public Utility Commission to assess all public utilities a percentage of their gross intrastate operating revenues for the preceding calendar year. Under Section 510, each public utility is required, on or before March 31 of each year to file with the Commission a statement of the utility's gross intrastate operating revenues for the preceding calendar year. After receiving the utilities' statements of gross intrastate operating revenues, the Commission sends general assessment invoices to all public utilities to advise each utility of the amount of assessment that utility owes based upon that utility's activity (gross intrastate operating revenues) in the preceding year. The enclosed assessment is for your proportionate share of the estimated expenses of the Public Utility Commission for the Commission's Fiscal Year July 1, 2017 to June 30, 2018.

**YOU ARE REQUIRED TO PAY THIS BILL WITHIN THIRTY DAYS AFTER YOU RECEIVE IT.** Objections to the assessment must be made in writing within 15 days and shall set out in detail the grounds upon which you regard the assessment to be excessive, erroneous, unlawful, or invalid. Objections may be filed only by the person, partnership, or corporation assessed. Filing an objection, however, does not eliminate your obligation to pay the assessment while your objection is being considered. **FAILURE TO PAY THE ASSESSMENT WHEN PAYMENT IS DUE WILL SUBJECT YOU TO PENALTIES.**

Be sure that your personal check or money order is written out in the same amount as your assessment invoice, and make your remittance payable to, "Commonwealth of PA". **DO NOT SEND CASH.** If you have reason to correspond with the Commission regarding your assessment invoice, please make reference to your invoice number. A receipt for payment will not be issued. Please mail your payment with the return portion of your invoice in the enclosed self-addressed envelope. Please note that rounding of your assessment to the nearest dollar has occurred. Your assessment for the PUC, including the OCA and the OSBA where applicable, has been combined into one invoice; one payment for all applicable assessments is acceptable. **A TWENTY (\$20.00) FEE WILL BE CHARGED FOR ALL DISHONORED OR BAD CHECKS REMITTED AS PAYMENT OF ASSESSMENTS.**

Your assessment has been computed by multiplying your gross intrastate operating revenues for the calendar year 2016 by the assessment factor for the public utility group of which you are a member. Your gross intrastate operating revenues for 2016 have been taken from the Assessment Reports Form GAO-16, AR-16-RR or AR-16-MC which you have filed with the Commission, or have been estimated by the Commission if you failed to file a timely report. Gross operating revenue reported to the Commission on the Assessment Reports may have been revised by the Commission to accurately reflect assessable revenue. The assessment factors for the various public utility groups are set forth in Schedule B enclosed herewith.

The approved estimate of expenditures of the Commission for the period July 1, 2017 to June 30, 2018 payable as a General Assessment by the public utilities which the Commission regulates has been determined as follows:

Estimate of the expenditures of the Commission  
for the Fiscal Year July 1, 2017 to June 30, 2018 \$73,499,000

Deduct:

Budget Reserve Pending Legislation (PWA)	\$733,000
Pipeline Operators per Act 127 of 2011	\$646,553
UGWF Administration Act 13 of 2012	\$1,408,000
Prior Years Returned Funds	\$5,400,000
Fee Collections	\$289,703
UCR/NGS/EGS	<u>\$12,114,652</u>

Total Deductions \$20,591,908

Total Assessment allocated to Public  
Utility groups furnishing various types  
of public service \$52,907,092

The way in which the total Public Utility Commission assessment of \$52,907,092 has been allocated to the various groups of public utilities is shown on Schedules A and B enclosed herewith.



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Rosemary Chiavetta  
Secretary  
PA Public Utility Commission

**MAKE INQUIRIES TO:**

Pennsylvania Public Utility Commission  
Bureau of Administrative Services/Assess  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**FOR CERTIFIED AND EXPRESS CARRIERS**

Pennsylvania Public Utility Commission  
Bureau of Administrative Services/Assess  
400 North Street  
Harrisburg, PA 17120

**CONTACT INFORMATION:**

Assessment Section Information - Telephone 717-265-7548

Allocation of Expenses based on percent of prior year Public Utility Group workload  
Budget Fiscal Year 2017-18

**SCHEDULE A**

<b>Group</b>	<b>Total Expenditures per Utility Group Calendar Year 2016</b>	<b>Percentage Distribution</b>	<b>Estimated Expenditures Fiscal Year 2017-2018 by Utility Group</b>
Electric	\$24,240,765	45.7222%	\$24,190,287
Gas	\$11,406,599	21.5148%	\$11,382,855
Pipeline	\$162,386	0.3063%	\$162,054
Steam Heat	\$282,440	0.5327%	\$281,836
Tele./Tele.	\$5,973,562	11.2671%	\$5,961,095
Water/Sewer	\$4,931,756	9.3021%	\$4,921,471
Transportation - Passenger	\$4,187,783	7.8989%	\$4,179,078
Transportation - Property	\$705,309	1.3303%	\$703,823
Transportation - Rail	\$1,126,948	2.1256%	\$1,124,593
<b>Total</b>	<b>\$53,017,548</b>	<b>100.00%</b>	<b>\$52,907,092</b>

**SCHEDULE B**

<b>Group</b>	<b>Estimated Expenditures Fiscal Year 2017-2018 by Utility Group</b>	<b>Gross intrastate revenues by utility group Calendar Year 2016</b>	<b>General Assessment Factor by Utility Group (Col. (a) / by Col. (b))</b>
	(a)	(b)	(c)
Electric	\$24,190,287	\$7,789,115,585	0.003105652591
Gas	\$11,382,855	\$3,089,182,967	0.003684746136
Pipeline	\$162,054	\$44,186,061	0.003667536692
Steam Heat	\$281,836	\$81,423,347	0.003461365940
Tele./Tele.	\$5,961,095	\$2,095,709,247	0.002844428448
Water/Sewer	\$4,921,471	\$1,161,310,517	0.004237859666
Transportation - Passenger	\$4,179,078	\$276,978,774	0.015088080360
Transportation - Property	\$703,823	\$412,397,692	0.001706660861
Transportation - Rail	\$1,124,593	\$106,882,231	0.010521795714
<b>Total</b>	<b>\$52,907,092</b>	<b>\$15,057,186,421</b>	<b>0.003513743572</b>

**SUPPLEMENTAL SCHEDULE  
FEDERAL SHORTFALL RELATED TO GAS SAFETY APPLICABLE TO GAS PUBLIC UTILITIES ONLY**

	<b>Estimated Commission Federal Shortfall for Calendar Year 2016 and 6 Months of Calendar Year 2017</b>	<b>Actual Commission Federal Shortfall for Calendar Year 2016 and 6 Months of Calendar Year 2017</b>	<b>Estimated Commission Federal Shortfall for Calendar Year 2017 and 6 Months of Calendar Year 2018</b>
Gas	(\$685,832)	\$329,532	\$356,300
	<b>Net Estimated Commission Federal Shortfall for Fiscal Year 2017-18 Assessment</b>	<b>Reported Revenue for Gas Utility Group for Calendar Year 2016</b>	<b>Supplemental add-on Factor</b>
Gas	\$0	\$3,419,595,396	0.000000000000

# I&E Exhibit 4

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**Status History ?**

**Tracking Number Information**

<b>Meter:</b>	12650040	<b>Mailing Date:</b>	09/05/17 01:58 PM
<b>Tracking Number:</b>	9171969009350170771615	<b>Sender:</b>	
<b>Current Status:</b>	OK : Delivered	<b>Recipient:</b>	
<b>Class of Mail</b>	FC	<b>Zip Code:</b>	19006
<b>Service:</b>	ERR	<b>City:</b>	HUNTINGDON VY
<b>Value</b>	\$0.460	<b>State:</b>	PA

[Proof of delivery](#)



**Status Details**

▼ Status Date	Status
Thu, 09/07/17, 10:45:00 AM	OK : Delivered
Thu, 09/07/17, 08:50:00 AM	Out for Delivery
Thu, 09/07/17, 08:40:00 AM	Sorting / Processing Complete
Thu, 09/07/17, 08:38:00 AM	Arrival at Unit
Wed, 09/06/17, 03:34:00 PM	Processed (processing scan)
Wed, 09/06/17, 11:20:00 AM	Processed (processing scan)
Wed, 09/06/17, 04:57:00 AM	Dispatched from Sort Facility
Tue, 09/05/17, 06:24:00 PM	Processed (processing scan)
Tue, 09/05/17, 05:09:00 PM	Origin Acceptance
Tue, 09/05/17, 04:52:00 PM	OK: USPS acknowledges reception of info

Note: Delivery status updates are processed throughout the day and posted upon receipt from the Postal Service.

# I&E Exhibit 5



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

I&E Exhibit 5  
Page 1 of 1

IN REPLY PLEASE  
REFER TO OUR FILE  
**17-640997-D**

November 8, 2017

PASHA LUXURY SERVICES INC  
67 BUCK ROAD SUITE 107  
HUNTINGDON VALLEY PA 19006

Dear Sir or Madam:

This letter is notification that your utility has outstanding assessment balances with the Commission. The past due balance is \$39,691.00 which includes \$22,182.00 for 2017-18 and \$17,509.00 for prior years.

You are required to pay the past due balance within twenty (20) days after receipt of this letter. If you fail to pay this balance, the Commission will institute appropriate legal action against you.

Pursuant to the Public Utility Code, 66 Pa. C.S. §510 (c), a certificated public utility is required to pay its assessment within 30 days after receipt of the original invoice, your failure to pay this assessment is a violation of the Public Utility Code and subjects you to legal action by this Commission including, but not limited to, the imposition of a civil penalty of \$1,000 per day for a continuing violation. The Commission will suspend or revoke certificates of public convenience and request suspension or revocation of automobile registration with the Department of transportation.

Please make your check payable to "Commonwealth of Pennsylvania" and mail the check and a copy of this letter to the following address:

Pennsylvania Public Utility Commission  
Bureau of Administrative Services  
Assessment Section  
P. O. Box 3265  
Harrisburg, PA 17105-3265

Should you have any questions regarding this matter, please contact the Bureau of Administrative Services, Assessment Division at 717-265-7548.

Sincerely,

*Yvonne R. Hess*

Yvonne R. Hess, Chief  
Finance and Assessment Division  
Bureau of Administration

# I&E Exhibit 6A



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

IN REPLY PLEASE  
REFER TO OUR FILE

Date of Service: July 27, 2016

Docket Number: C-2016-2558533

GREGG FOX  
PASHA LUXURY SERVICES INC  
T/A THE CORPORATE SEDAN SERVICE  
67 BUCK RD STE 107  
HUNTINGDON VALLEY PA 19006

**Bureau of Investigation and Enforcement**

v.

**Pasha Luxury Services, Inc. t/a The Corporate Sedan Service**

Dear Sir/Madam:

The Pennsylvania Public Utility Commission has delegated its authority to initiate prosecutory proceedings to several of its Commission bureaus with enforcement responsibilities. Pursuant to this delegated authority and Section 701 of the Public Utility Code, 66 Pa. C.S. § 701, Bureau of Investigation and Enforcement staff has filed the attached Complaint against you seeking a monetary penalty and/or revocation of your Certificate of Public Convenience.

Very truly yours,

Rosemary Chiavetta  
Secretary

ane



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

July 26, 2016

**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. Pasha Luxury Services, Inc. t/a The Corporate  
Sedan Service  
Docket No. C-2016-\_\_\_\_\_

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Complaint in the above-referenced case on behalf of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission. Copies have been served on the parties of record in accordance with the Certificate of Service.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kourtney L. Myers".

Kourtney L. Myers  
Prosecutor  
PA Attorney ID No. 316494

Prosecutor for the Bureau of  
Investigation and Enforcement

Enclosures

cc: As per Certificate of Service

**NOTICE**

**A. You must file an Answer within 20 days of the date of service of this Complaint.**

The date of service is the mailing date as indicated at the top of the Secretarial Letter. *See* 52 Pa. Code §1.56(a). The Answer must raise all factual and legal arguments that you wish to claim in your defense, include the docket number of this Complaint, and be verified. You may file your Answer by mailing an original to:

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

Or, you may eFile your Answer using the Commission's website at [www.puc.pa.gov](http://www.puc.pa.gov). The link to eFiling is located under the Filing & Resources tab on the homepage. If your Answer is 250 pages or less, you are not required to file a paper copy. If your Answer exceeds 250 pages, you must file a paper copy with the Secretary's Bureau.

Additionally, a copy should either be mailed to:

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

Or, emailed to Mr. Swindler at: [RA-PCCmplntResp@pa.gov](mailto:RA-PCCmplntResp@pa.gov)

B. If you fail to answer this Complaint within 20 days, the Bureau of Investigation and Enforcement will request that the Commission issue an Order imposing the penalty.

C. You may elect not to contest this Complaint by paying the past due assessment and civil penalty within 20 days. Send only a certified check or money order made payable to the "Commonwealth of Pennsylvania" and mail to:

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

D. If you file an Answer which either admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request the Commission to issue an Order imposing the penalty set forth in this Complaint.

E. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision. The Judge is not bound by the penalty set forth in the Complaint, and may impose additional and/or alternative penalties as appropriate.

F. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code § 1.21.

G. Alternative formats of this material are available for persons with disabilities by contacting the Commission's ADA Coordinator at 717-787-8714.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2016-
	:	
Pasha Luxury Services, Inc.	:	
t/a The Corporate Sedan Service	:	

**COMPLAINT**

NOW COMES the Bureau of Investigation and Enforcement (I&E) of the Pennsylvania Public Utility Commission (Commission), by its prosecuting attorneys, and files this Complaint against Pasha Luxury Services, Inc. t/a The Corporate Sedan Service (Respondent), pursuant to Section 701 of the Public Utility Code, 66 Pa.C.S. § 701. In support of its Complaint, I&E respectfully represents the following:

**Parties and Jurisdiction**

1. The Pennsylvania Public Utility Commission, with a mailing address of P.O. Box 3265, Harrisburg, PA 17105-3265, is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth pursuant to the Public Utility Code, 66 Pa.C.S. §§ 101, *et seq.*

2. Complainant is the Commission's Bureau of Investigation and Enforcement and is the entity established by statute to prosecute complaints against public utilities pursuant to 66 Pa.C.S. § 308.2(a)(11).

3. Complainant is represented by:

Kourtney L. Myers  
Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
717.705.4366  
komyers@pa.gov

Stephanie M. Wimer  
Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
717.772.8839  
stwimer@pa.gov

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

4. Respondent is Pasha Luxury Services, Inc. t/a The Corporate Sedan Service and maintains its principal place of business at 67 Buck Road, Suite 107, Huntingdon Valley, PA 19006, Attention: Gregg Fox.

5. Respondent is a “public utility” as that term is defined at 66 Pa.C.S. § 102, as it is engaged in transporting passengers in the Commonwealth of Pennsylvania for compensation.

6. The Commission issued Respondent a Certificate of Public Convenience on or about October 25, 2001, at A-00117967, for limousine authority.

7. Section 501(a) of the Public Utility Code, 66 Pa.C.S. § 501(a), authorizes and obligates the Commission to execute and enforce the provisions of the Public Utility Code.

8. Section 701 of the Public Utility Code, 66 Pa.C.S. § 701, authorizes the Commission to, *inter alia*, hear and determine complaints against public utilities for a violation of any law or regulation that the Commission has jurisdiction to administer.

9. Section 3301 of the Public Utility Code, 66 Pa.C.S. § 3301, authorizes the Commission to impose civil penalties on any public utility, or any other person or corporation subject to the Commission's authority, for violation(s) of the Public Utility Code and/or Commission regulations.

10. Respondent, in transporting passengers as a common carrier for compensation, is subject to the power and authority of this Commission pursuant to Section 501(c) of the Public Utility Code, 66 Pa.C.S. § 501(c), which requires a public utility to comply with Commission regulations.

11. Pursuant to the provisions of the applicable Commonwealth statutes and regulations, the Commission has jurisdiction over the subject matter of this complaint and the actions of Respondent related thereto.

### **Factual Background**

#### **Prior Case**

12. On March 9, 2010, the Commission's Bureau of Transportation and Safety (BTS) filed a Complaint against Respondent at Docket No. C-2010-2162089, alleging that Respondent violated Section 510(c) of the Public Utility Code, 66 Pa.C.S. § 510(c),

by failing to pay assessments set forth in invoices that Respondent received on August 29, 2008 and September 9, 2009. BTS requested that Respondent pay the outstanding assessment balance of \$16,248 related to the above-referenced past due assessment invoices and if not paid, that the Commission cancel Respondent's Certificate of Public Convenience, notify the Pennsylvania Department of Revenue and Respondent's insurance carrier of the revocation of Respondent's Certificate of Public Convenience, and impose a civil penalty upon Respondent.

13. On April 13, 2010, Respondent paid the full amount of the above-referenced outstanding assessment balance and the Complaint docketed at C-2010-2162089 was marked closed.

#### **2015-2016 Fiscal Year**

14. On or about September 10, 2015, the Commission mailed to Respondent, by certified mail, an assessment invoice for the July 1, 2015 to June 30, 2016 Fiscal Year (2015-2016 Fiscal Year). Respondent's assessment was \$15,241.

15. Accompanying the assessment invoice was a notice that informed Respondent that it was obligated to pay the amount listed on the assessment invoice within thirty (30) days or file objections within fifteen (15) days.

16. On September 14, 2015, Respondent signed a certified mail card, which indicated that it received an assessment invoice and notice of assessment for the 2015-2016 Fiscal Year.

17. The Commission received no objections from Respondent to the assessment amount set forth in the 2015-2016 Fiscal Year Assessment Invoice.

18. Respondent failed to pay its 2015-2016 Fiscal Year Assessment Invoice.
19. The total outstanding assessment balance for Respondent is \$15,241.

**Violation**

20. That Respondent failed to satisfy its 2015-2016 Fiscal Year Assessment in that it did not pay the amount due within thirty (30) days of receipt of the invoice. If proven, this is a violation of Section 510(c) of the Public Utility Code, 66 Pa.C.S. § 510(c). The Bureau of Investigation and Enforcement's proposed civil penalty for this violation is 25% of the outstanding assessment balance or \$3,810. This civil penalty is based, in part, on Respondent's history of noncompliance with the Public Utility Code involving a failure to timely pay assessments, as set forth above.

**WHEREFORE**, for all the foregoing reasons, the Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement respectfully requests that:

- (a) Respondent be ordered to pay a total of \$19,051, which consists of its outstanding assessment balance of \$15,241 and a civil penalty of \$3,810 for the above-described violation; and
- (b) If payment of the assessment and civil penalty is not made, the Bureau of Investigation and Enforcement requests that:
  - (1) the Commission issue an Order to cancel the Certificate of Public Convenience issued to Respondent;
  - (2) this matter be referred to the Pennsylvania Office of Attorney General for appropriate action; and
  - (3) the Commission certify automobile registrations to the Pennsylvania Department of Transportation for suspension or revocation.

Respectfully submitted,



Kourtney L. Myers  
Prosecutor

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
717.705.4366  
[komyers@pa.gov](mailto:komyers@pa.gov)

Date: July 26, 2016

Pennsylvania Public Utility Commission :  
Bureau of Investigation and Enforcement :  
 :  
 :  
 v. : Docket No. C-2016-  
 :  
 :  
 Pasha Luxury Services, Inc. :  
t/a The Corporate Sedan Service :

**VERIFICATION**

I, Mandy Freas, Accountant, Bureau of Administrative Services, Assessment Section, 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 the Bureau 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: July 26, 2016

  
\_\_\_\_\_  
Mandy Freas, Accountant  
Assessment Section  
Bureau of Administrative Services  
PA. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

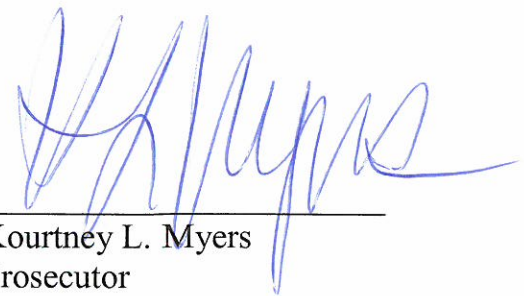
Pennsylvania Public Utility Commission :  
Bureau of Investigation and Enforcement :  
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 v. : Docket No. C-2016-  
 :  
 :  
 Pasha Luxury Services, Inc. :  
 t/a The Corporate Sedan Service :

**CERTIFICATE OF SERVICE**

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

Notification by Certified Mail:

Gregg Fox, President  
Pasha Luxury Services, Inc.  
t/a The Corporate Sedan Service  
67 Buck Road  
Suite 107  
Huntingdon Valley, PA 19006



---

Kourtney L. Myers  
Prosecutor  
PA Attorney ID No. 316494

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
717.705.4366  
[komyers@pa.gov](mailto:komyers@pa.gov)

Dated: July 26, 2016

# I&E Exhibit 6B



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

IN REPLY PLEASE  
REFER TO OUR FILE

July 5, 2017

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. Pasha Luxury Services, Inc. t/a The Corporate Sedan  
Service  
Docket No. C-2016-2558533 (**Certificate of Satisfaction**)

Dear Secretary Chiavetta,

Pasha Luxury Services, Inc. t/a The Corporate Sedan Service (Respondent) has paid, in full, its outstanding assessment balance for the July 1, 2015 to June 30, 2016 Fiscal Year (2015-2016 Fiscal Year) and the agreed-upon civil penalty in order to resolve the above-docketed complaint without litigation.

On June 30, 2017, the Commission received a check from Respondent's counsel in the amount of \$17,241, which constitutes payment of Respondent's outstanding assessment balance for the 2015-2016 Fiscal Year in the amount of \$15,241, as well as \$2,000 related to the agreed-upon monetary fine for Respondent's failure to timely pay the Commission's assessment.

Accordingly, pursuant to 52 Pa. Code § 5.24(a), I&E files this letter to certify that the above-docketed proceeding has been satisfied and should be marked closed.

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

Sincerely,

Kourtney L. Myers, Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
(717) 705-4366  
[komyers@pa.gov](mailto:komyers@pa.gov)

cc: As per Certificate of Service



# I&E Exhibit 7A



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BLD 400 NORTH ST 2<sup>ND</sup> FL  
HARRISBURG PA 17120

IN REPLY PLEASE  
REFER TO OUR FILE

Date of Service: December 13, 2017

Docket Number: C-2017-2638061

GREGG FOX PRESIDENT  
PASHA LUXURY SERVICES INC  
T/A THE CORPORATE SEDAN SERVICE  
67 BUCK ROAD SUITE 107  
HUNTINGDON VALLEY PA 19006

**Bureau of Investigation and Enforcement**

v.

**Pasha Luxury Services, Inc. t/a The Corporate Sedan Service**

Dear Sir/Madam:

The Pennsylvania Public Utility Commission has delegated its authority to initiate prosecutory proceedings to several of its Commission bureaus with enforcement responsibilities. Pursuant to this delegated authority and Section 701 of the Public Utility Code, 66 Pa. C.S. § 701, Bureau of Investigation and Enforcement staff has filed the attached Complaint against you seeking a monetary penalty and/or revocation of your Certificate of Public Convenience.

Very truly yours,

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

Rosemary Chiavetta  
Secretary

RC/mm



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

December 13, 2017

**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. Pasha Luxury Services, Inc. t/a The Corporate  
Sedan Service  
Docket No. C-2017-\_\_\_\_\_

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Complaint in the above referenced case on behalf of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission. Copies have been served on the parties of record in accordance with the Certificate of Service.

Sincerely,

Kourtney L. Myers  
Prosecutor  
PA Attorney ID No. 316494

Prosecutor for the Bureau of  
Investigation and Enforcement

Enclosures

cc: As per Certificate of Service

**NOTICE**

**A. You must file an Answer within 20 days of the date of service of this Complaint.**

The date of service is the mailing date as indicated at the top of the Secretarial Letter. *See* 52 Pa. Code §1.56(a). The Answer must raise all factual and legal arguments that you wish to claim in your defense, include the docket number of this Complaint, and be verified. You may file your Answer by mailing an original to: Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Or, you may eFile your Answer using the Commission's website at [www.puc.pa.gov](http://www.puc.pa.gov). The link to eFiling is located under the Filing & Resources tab on the homepage. If your Answer is 250 pages or less, you are not required to file a paper copy. If your Answer exceeds 250 pages, you must file a paper copy with the Secretary's Bureau.

Additionally, a copy should either be mailed to:

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

Or, emailed to Mr. Swindler at: [RA-PCCmplntResp@pa.gov](mailto:RA-PCCmplntResp@pa.gov)

B. If you fail to answer this Complaint within 20 days, the Bureau of Investigation and Enforcement will request that the Commission issue an Order imposing the requested relief.

C. You may elect not to contest this Complaint by paying the past due assessment and civil penalty within 20 days. Send only a certified check or money order made payable to the "Commonwealth of Pennsylvania," with the docket number indicated, and mail to:  
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

D. If you file an Answer which either admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request the Commission to issue an Order imposing the requested relief set forth in this Complaint.

E. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision. The Judge is not bound by the penalty set forth in the Complaint, and may impose additional and/or alternative penalties as appropriate.

F. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code § 1.21.

G. Alternative formats of this material are available for persons with disabilities by contacting the Commission's ADA Coordinator at 717-787-8714.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2017-
	:	
Pasha Luxury Services, Inc.	:	
t/a The Corporate Sedan Service	:	

**COMPLAINT**

NOW COMES the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), by its prosecuting attorneys, and files this Complaint against Pasha Luxury Services, Inc. t/a The Corporate Sedan Service (“Respondent”), pursuant to Section 701 of the Public Utility Code, 66 Pa.C.S. § 701. In support of its Complaint, I&E respectfully represents the following:

**Parties and Jurisdiction**

1. The Pennsylvania Public Utility Commission, with a mailing address of P.O. Box 3265, Harrisburg, PA 17105-3265, is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth pursuant to the Public Utility Code, 66 Pa.C.S. §§ 101, *et seq.*

2. Complainant is the Commission’s Bureau of Investigation and Enforcement and is the entity established by statute to prosecute complaints against public utilities pursuant to 66 Pa.C.S. § 308.2(a)(11). *See also Implementation of Act 129 of 2008;*

*Organization of Bureaus and Offices*, Docket No. M-2008-2071852 (Order entered August 11, 2011) at 5 (transferring authority to prosecute assessment cases to I&E).

3. Complainant is represented by:

Kourtney L. Myers  
Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
717.705.4366  
komyers@pa.gov

Timothy K. McHugh  
Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
717.772.8582  
timchugh@pa.gov

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

4. Respondent is Pasha Luxury Services, Inc. t/a The Corporate Sedan Service and maintains its principal place of business at 67 Buck Road, Suite 107, Huntingdon Valley, PA 19006, Attention: Gregg Fox.

5. Respondent is a “public utility” as that term is defined at 66 Pa.C.S. § 102, as it is engaged in transporting passengers in the Commonwealth of Pennsylvania for compensation.

6. The Commission issued Respondent a Certificate of Public Convenience on or about October 25, 2001, at A-00117967, for limousine authority.

7. Section 501(a) of the Public Utility Code, 66 Pa.C.S. § 501(a), authorizes and obligates the Commission to execute and enforce the provisions of the Public Utility Code.

8. Section 701 of the Public Utility Code, 66 Pa.C.S. § 701, authorizes the Commission to, *inter alia*, hear and determine complaints against public utilities for a violation of any law or regulation that the Commission has jurisdiction to administer.

9. Section 3301 of the Public Utility Code, 66 Pa.C.S. § 3301, authorizes the Commission to impose civil penalties on any public utility, or any other person or corporation subject to the Commission's authority, for violation(s) of the Public Utility Code and/or Commission regulations. Section 3301(a)-(b) of the Public Utility Code, 66 Pa.C.S. § 3301(a)-(b), allows for the imposition of a separate civil penalty for each violation and each day's continuance of such violation(s).

10. Respondent, in transporting passengers as a common carrier for compensation, is subject to the power and authority of this Commission pursuant to Section 501(c) of the Public Utility Code, 66 Pa.C.S. § 501(c), which requires a public utility to comply with Commission regulations.

11. Pursuant to the provisions of the applicable Commonwealth statutes and regulations, the Commission has jurisdiction over the subject matter of this complaint and the actions of Respondent related thereto.

## **Factual Background**

### **PRIOR ASSESSMENT-RELATED COMPLAINT**

12. On July 26, 2016, I&E filed a Complaint against Respondent at Docket No. C-2016-2558533, alleging that Respondent violated Section 510(c) of the Public Utility Code, 66 Pa.C.S. § 510(c), by failing to satisfy its assessment for the July 1, 2015 to June 30, 2016 Fiscal Year (“2015-2016 Fiscal Year”) in the amount of \$15,241. In addition to payment of the outstanding assessment, I&E sought payment of a civil penalty in the amount of \$3,810.

13. On July 5, 2017, I&E filed a Certificate of Satisfaction pursuant to 52 Pa. Code § 5.24, noting that Respondent satisfied its outstanding assessment and an agreed-upon civil penalty.

### **2016-2017 FISCAL YEAR**

14. On or about February 14, 2016, the Commission mailed to Respondent an assessment report for Respondent to report its gross intrastate operating revenues for the 2015 calendar year.

15. The assessment report was accompanied by a letter, which notified Respondent that the report was to be completed and returned to the Commission on or before March 31, 2016.

16. Respondent failed to file an assessment report stating its 2015 calendar year revenues.

17. On or about September 7, 2016, the Commission mailed to Respondent, by certified mail, an assessment invoice for the July 1, 2016 to June 30, 2017 Fiscal Year

(“2016-2017 Fiscal Year”) that was based, in part, on Respondent’s estimated revenues for the 2015 calendar year. Respondent’s assessment was \$17,509.

18. Accompanying the assessment invoice was a notice that informed Respondent that it was obligated to pay the amount listed on the assessment invoice within thirty (30) days or file objections within fifteen (15) days.

19. On September 14, 2016, Respondent signed a certified mail card, which indicated that it received the assessment invoice and notice of assessment for the 2016-2017 Fiscal Year.

20. The Commission received no objections from Respondent to the assessment amount set forth in the 2016-2017 Fiscal Year Assessment Invoice.

21. Respondent failed to pay the amount of the 2016-2017 Fiscal Year Assessment Invoice.

22. The total outstanding assessment balance for Respondent is \$17,509.

## **Violations**

### **COUNT 1**

23. That Respondent failed to report its gross intrastate operating revenues for the 2015 calendar year in that it did not file an assessment report for that year. If proven, this is a violation of Section 510(b) of the Public Utility Code, 66 Pa.C.S. § 510(b). The Bureau of Investigation and Enforcement’s proposed civil penalty for this violation is \$1,000.<sup>1</sup> This civil penalty, consistent with past Commission decisions,<sup>2</sup> is based on

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<sup>1</sup> I&E anticipates that this level of penalty will provide a sufficient deterrent against future violations by Respondent.

Respondent's unacceptable history of compliance with the Public Utility Code and Commission's regulations,<sup>3</sup> the amount of Respondent's outstanding assessment balance related to the 2016-2017 Fiscal Year, and the need to deter future violations of the Public Utility Code and the Commission's regulations pursuant to 52 Pa. Code § 69.1201.<sup>4</sup>

## COUNT 2

24. That Respondent failed to satisfy its 2016-2017 Fiscal Year Assessment in that it did not pay the amount due within thirty (30) days of receipt of the invoice. If proven, this is a violation of Section 510(c) of the Public Utility Code, 66 Pa.C.S. § 510(c). The Bureau of Investigation and Enforcement's proposed civil penalty for this violation is 25% of the outstanding assessment balance or \$4,377.<sup>5</sup> This civil penalty, consistent with past Commission decisions,<sup>6</sup> is based on Respondent's unacceptable history of compliance with the Public Utility Code and Commission's

---

<sup>2</sup> See *Pa. Pub. Util. Comm'n v. Juan Genet Enter., LLC t/a Safe Destinations*, Docket No. C-2014-2450660 (Order entered August 3, 2017); *Pa. Pub. Util. Comm'n v. Leo Movers & Storage, Inc.*, Docket No. C-2015-2494528 (Order entered August 3, 2017); *Pa. Pub. Util. Comm'n v. Hoffman Landscaping & Trucking, LLP*, Docket No. C-2015-2495061 (Order entered September 21, 2017); *Pa. Pub. Util. Comm'n v. Deer Haven, LLP*, Docket No. C-2015-2498095 (Order entered October 26, 2017); *Pa. Pub. Util. Comm'n v. Reach for the Stars Limousine Serv. Inc.*, Docket No. C-2015-2499276 (Order entered October 26, 2017).

<sup>3</sup> A review of the Commission's records for a period of three (3) years prior to the date of the filing of this Complaint demonstrates that Respondent has an unacceptable compliance history with the Commission as Respondent failed to timely pay its 2015-2016 Fiscal Year Assessment of \$15,241 to the Commission. See *supra* ¶¶ 12-13.

<sup>4</sup> The Commission promulgated a Policy Statement at 52 Pa. Code § 69.1201 as a guideline that sets forth ten factors that are to be considered when evaluating whether and to what extent a civil penalty for violating a Commission order, regulation, or statute is warranted. Among these factors are the compliance history of the regulated entity that committed the violation, the amount of the civil penalty necessary to deter future violations, and past Commission decisions in similar situations. 52 Pa. Code §§ 69.1201(c)(6), (8), (9).

<sup>5</sup> I&E anticipates that this level of penalty will provide a sufficient deterrent against future violations by Respondent.

<sup>6</sup> See *supra* note 2.

regulations,<sup>7</sup> the amount of Respondent's outstanding assessment balance related to the 2016-2017 Fiscal Year, and the need to deter future violations of the Public Utility Code and the Commission's regulations pursuant to 52 Pa. Code § 69.1201.

**WHEREFORE**, for all the foregoing reasons, the Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement respectfully requests that:

- (a) Respondent be ordered to pay a total of \$22,886, which consists of its outstanding assessment balance of \$17,509 and a total civil penalty of \$5,377 for the above described violations. Said payment should be made by certified check or money order, made payable to the "Commonwealth of Pennsylvania" with the docket number of this proceeding listed, and mailed to the Secretary's Bureau of the Commission;
- (b) Respondent be directed to file assessment reports on a going-forward basis; and
- (c) If payment of the assessment and civil penalty is not made, the Bureau of Investigation and Enforcement requests that:
  - (1) the Commission issue an Order to cancel the Certificate of Public Convenience issued to Respondent;
  - (2) this matter be referred to the Pennsylvania Office of Attorney General for appropriate action; and

---

<sup>7</sup> See *supra* note 3.

(3) the Commission certify automobile registrations to the Pennsylvania Department of Transportation for suspension or revocation.

Respectfully submitted,



Kourtney L. Myers  
Prosecutor

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
717.705.4366  
komyers@pa.gov

Date: December 13, 2017

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement

v.

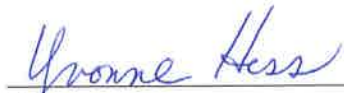
Pasha Luxury Services, Inc.  
t/a The Corporate Sedan Service

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: Docket No. C-2017-  
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**VERIFICATION**

I, Yvonne Hess, Chief of Finance and Assessments, Bureau of Administrative Services, Finance and Assessment Section, 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 the Bureau 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: December 13, 2017

  
\_\_\_\_\_  
Yvonne Hess, Chief of Finance and Assessments  
Finance and Assessment Section  
Bureau of Administrative Services  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265



# I&E Exhibit 7B



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

IN REPLY PLEASE  
REFER TO OUR FILE  
C-2017-2638061

April 3, 2019

**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. Pasha Luxury Services, Inc. t/a The Corporate Sedan  
Service  
Docket No. C-2017-2638061 (**Certificate of Satisfaction**)

Dear Secretary Chiavetta:

Pasha Luxury Services, Inc. t/a The Corporate Sedan Service ("Respondent") has paid, in full, its outstanding assessment balance for the July 1, 2016 to June 30, 2017 Fiscal Year ("2016-2017 Fiscal Year") and the agreed-upon civil penalty to resolve the above-docketed complaint without litigation.

On April 2, 2019, the Commission received two (2) certified checks from Respondent totaling \$20,198, which constitutes payment of Respondent's outstanding assessment balance for the 2016-2017 Fiscal Year in the amount of \$17,509, as well as \$2,689 related to the civil penalty for Respondent's failure to timely pay the Commission's assessment and file an assessment report demonstrating its gross intrastate revenues earned during the 2015 calendar year.

Accordingly, pursuant to 52 Pa. Code § 5.24(a), I&E files this letter to certify that the above-docketed proceeding has been satisfied and should be marked closed.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "K. Myers", is written over the typed name.

Kourtney L. Myers  
Prosecutor

Enclosures

cc: Honorable Darlene D. Heep  
As per Certificate of Service

Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement

v.

Pasha Luxury Services, Inc.  
t/a The Corporate Sedan Service

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: Docket No. C-2017-2638061  
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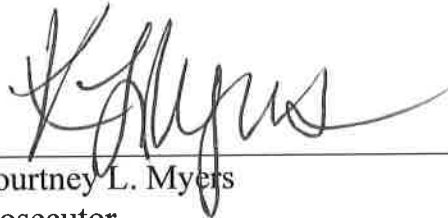
### CERTIFICATE OF SERVICE

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).

#### Service by First Class Mail:

David P. Temple, Esq.  
Gallagher Law P.C.  
1600 Market Street  
Suite 1320  
Philadelphia, PA 19103

*Counsel for Pasha Luxury Services, Inc.  
t/a The Corporate Sedan Service*



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Kourtney L. Myers  
Prosecutor  
PA Attorney ID No. 316494

Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, Pennsylvania 17105-3265  
(717) 705-4366  
[komyers@pa.gov](mailto:komyers@pa.gov)

Dated: April 3, 2019

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2019-3012562
	:	
Pasha Luxury Services, Inc.	:	
t/a The Corporate Sedan Service,	:	
Respondent	:	

**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 Electronic Mail**

Gregg Fox, Owner/Operator  
Pasha Luxury Services, Inc.  
t/a The Corporate Sedan Service  
67 Buck Road  
Suite 107  
Huntingdon Valley, PA 19006  
[greggfox@sedanservice.com](mailto:greggfox@sedanservice.com)

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*Attorney for Pasha Luxury Services, Inc.  
t/a The Corporate Sedan Service*



Kourtney L. Myers  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 316494  
[komyers@pa.gov](mailto:komyers@pa.gov)

Date: February 24, 2021