



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

January 28, 2022

**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.  
Luxury Limousine & Car Service, LLC  
Docket No. C-2021-3027389  
**Petition for Leave to Withdraw Complaint**

Dear Secretary Chiavetta,

Enclosed for electronic filing please find the Bureau of Investigation and Enforcement's Petition for Leave to Withdraw the Complaint in the above-captioned case pursuant to 52 Pa. Code § 5.94. A party may object to the petition within 10 days of service.

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

Sincerely,

A handwritten signature in black ink that reads 'Chris M. Andreoli'.

Christopher M. Andreoli  
Prosecutor  
PA Attorney ID No. 85676  
Bureau of Investigation and Enforcement  
(717) 772-8582  
[chandreoli@pa.gov](mailto:chandreoli@pa.gov)

CMA/jfm  
Enclosures

cc: Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2021-3027389
	:	
Luxury Limousine & Car Service, LLC,	:	
Respondent	:	

**PETITION FOR LEAVE TO WITHDRAW COMPLAINT**

NOW COMES the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Investigation and Enforcement (“I&E”), by its prosecuting attorneys, and files this Petition for Leave to Withdraw the Complaint against Luxury Limousine & Car Service, LLC (“Luxury Limousine” or “Respondent”) pursuant to 52 Pa. Code § 5.94. In support thereof, I&E respectfully represents as follows:

1. I&E commenced this action on July 21, 2021 by filing a Complaint.
2. I&E alleged that Luxury Limousine failed to satisfy its 2019-2020 Fiscal Year Assessment in that it did not pay the amount due within thirty (30) days of receipt of the invoice, which is a violation of Section 510(c) of the Public Utility Code, 66 Pa.C.S. § 510(c). I&E’s Complaint requested that Respondent pay the outstanding assessment balance of \$349 and a total civil penalty of \$52 for the above-described violation.
3. On August 18, 2021, Attorney Steven Mirow contacted I&E and stated that Luxury Limousine is no longer in business and that the company’s

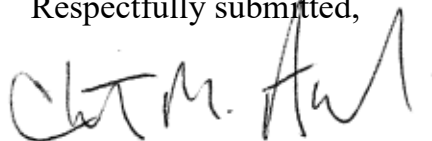
assets had been distributed to its two judgment creditors: Wells Fargo Bank and Santander Bank.

4. According to the documents provided, as of February 1, 2021, all of the assets of Luxury Limousine have been liquidated and disbursed to its judgment creditors.

5. Attorney Mirow added that the family of the owner of Luxury Limousine had to move into another family member's home due to this hardship and loss of income.

6. Given that Luxury Limousine is no longer operating and given the fact that it has no assets, I&E respectfully requests that the Commission grant the Petition to Withdraw the Complaint in the above-captioned matter.

Respectfully submitted,



Christopher M. Andreoli  
Prosecutor  
PA Attorney ID No. 85676

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
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Date: January 28, 2022


**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2021-3027389
	:	
Luxury Limousine & Car Service, LLC,	:	
Respondent	:	

**VERIFICATION**

I, Amy Zuvich, Chief of Finance and Assessments, Bureau of Administration, 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: January 28, 2022



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Amy Zuvich, Chief of Finance and Assessments  
Finance and Assessment Section  
Bureau of Administration  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

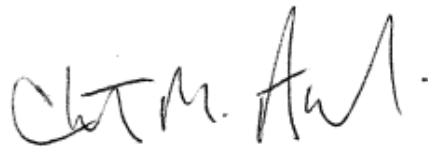
Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2021-3027389
	:	
Luxury Limousine & Car Service, LLC,	:	
Respondent	:	

**CERTIFICATE OF SERVICE**

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

**Served via Electronic Mail:**

Law Offices of Steven B. Mirow  
249 South 12th Street  
Philadelphia, Pennsylvania 19107-5635  
Tel.: (610) 990-9317  
Email: [SBMirow.LawOffice@GMail.com](mailto:SBMirow.LawOffice@GMail.com)



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Christopher M. Andreoli  
Prosecutor  
PA Attorney ID No. 85676

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Dated: January 28, 2022