BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION :

BUREAU OF INVESTIGATION AND ENFORCEMENT :

:

v. : DOCKET NO. C-2022-3029073

:

TAKOUKAM TRADING LLC :  
t/a AMERICAN TAXI :

2907 GREEN STREET :

HARRISBURG PA 17110 :

COMPLAINT

The Pennsylvania Public Utility Commission (Commission) is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth. The Commission has delegated its authority to initiate proceedings which are prosecutory in nature to the Bureau of Investigation and Enforcement and other bureaus with enforcement responsibilities. Pursuant to that delegated authority and Section 701 of the Public Utility Code, the Bureau of Investigation and Enforcement hereby represents as follows:

1. That TAKOUKAM TRADING LLC t/a AMERICAN TAXI, Respondent, maintains its principal place of business at 2907 Green Street, Harrisburg, PA 17110.
2. That Respondent was issued a certificate of public convenience by this Commission authorizing transportation of passengers in taxi authority on March 17, 2017, at Pa. PUC utility code no. 6419354.
3. That on October 6, 2021, PUC Enforcement Officers Enid Scharl and Peter Mozurkevich inspected a 2012 Dodge bearing registration No. TX49671 and vehicle identification no. 2C4RDGCGXCR139737 at 436 S Cameron Street, Harrisburg, Dauphin County, Pennsylvania.   
   The following violations were found:
4. The vehicle battery was not securely fastened.
5. The anchorage was loose or broken on the front driver side and the safety belt was non-operable on the front passenger side.
6. That Respondent’s vehicle was checked for meter calibration over a measured mile. The meter displayed a rate that was not consistent with Respondent’s tariff rate.
7. That Respondent, by permitting a vehicle to be operated with a vehicle battery that was not securely fastened, violated 52 Pa. Code §29.402(1) and 67 Pa. Code §175.66(n).   
   The penalty for this violation is $100.00.
8. That Respondent, by permitting a vehicle to be operated with anchorage and a safety belt that were non-operable violated, and 52 Pa. Code §29.402(1) and 67 Pa. Code §175.78(g).   
   The penalty for this violation is $100.00.
9. That Respondent, by failing to properly regulate the meter, violated the  
    Public Utility Code, 52 Pa. Code §29.314(b)(6). The penalty for this violation is $250.00.

WHEREFORE, the Bureau of Investigation and Enforcement hereby requests that the Commission fine Takoukam Trading LLC t/a American Taxi the sum of four hundred and fifty dollars ($450.00) for the illegal activity described in this Complaint and order such other remedy as the Commission may deem to be appropriate.

A screenshot of a computer

Description automatically generated with medium confidence Respectfully submitted,

Date: February 9, 2022 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Andrew Turriziani, Chief

Motor Carrier Enforcement

Bureau of Investigation and Enforcement

400 North Street

Harrisburg, PA  17120

VERIFICATION

I, Andrew Turriziani, 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 Bureau will be able to prove 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.

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Description automatically generated with medium confidence

Date: \_\_February 9, 2022 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Andrew Turriziani, Chief

Motor Carrier Enforcement

Bureau of Investigation and Enforcement

**NOTICE**

1. You must file an Answer within twenty (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 Cover Letter for this Complaint and Notice, 52 Pa. Code §1.56(a). An Answer is a written explanation of circumstances wished to be considered in determining the outcome. The Answer shall raise all factual and legal arguments that you wish to claim in your defense and must include the reference number of this Complaint. Your Answer must be verified, and the original shall be mailed to:

Rosemary Chiavetta, Secretary

Pennsylvania Public Utility Commission

400 North Street, 2nd Floor

Harrisburg, Pennsylvania 17120

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

Bureau of Investigation and Enforcement

Pennsylvania Public Utility Commission

400 North Street, 3rd Floor

Harrisburg, Pennsylvania 17120

Or, **e-mailed to** Mr. Swindler at: RA-PCCmplntResp@pa.gov

1. If you fail to answer this complaint within twenty (20) days, the Bureau of Investigation and Enforcement will request that the Commission issue a Secretarial Letter imposing a penalty. The penalty could include a fine, the suspension or revocation of your certificate of public convenience or other remedy.
2. You may elect not to contest this complaint by paying the fine proposed in this Complaint by certified check or money order. Payment must be made to the **Commonwealth of Pennsylvania** and should be forwarded to:

Rosemary Chiavetta, Secretary

Pennsylvania Public Utility Commission

400 North Street, 2nd Floor

Harrisburg, Pennsylvania 17120

1. Your payment is an admission that you committed the alleged violation and an agreement to cease and desist from further violations. Upon receipt of your payment, the complaint proceeding shall be closed.
2. If you file an Answer, which admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request that the Commission issue a Secretarial Letter imposing a penalty.
3. 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 optional fine set forth above.
4. Alternative formats of this material are available for persons with disabilities by contacting the Commission’s ADA Coordinator at 717-787-8714.