

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION :  
BUREAU OF INVESTIGATION AND ENFORCEMENT :

V. :

KEYSTONE TRANSPORTATION LLC :  
2304 WALNUT STREET :  
HARRISBURG, PA 17111 :

DOCKET NO. C-2023-3040815

COMPLAINT

The Pennsylvania Public Utility Commission (Commission or PUC) 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 Keystone Transportation LLC, Respondent, maintains its principal place of business at 2304 Walnut Street, Harrisburg, PA 17111.

2. That Respondent was issued a certificate of public convenience by this Commission on November 13, 2020, at Docket No. A-2020-3021044, to transport, as a common carrier, by motor vehicle, persons, in paratransit service, from points in the counties of Dauphine, Cumberland, and York, to points in Pennsylvania, and return for compensation.

3. On April 14, 2023, Pa PUC Enforcement Supervisor Timothy Troxell conducted a random inspection of a 2009 Dodge Caravan Pa. Registration no. BA83413 at 2805 Market Street Road, Harrisburg, Dauphin County, Pa.

4. Supervisor Troxell conducted a Driver/Vehicle Compliance Report (DVCR) on the vehicle and the following violations were found:

- a. Vehicle passenger door on the left side does not have an exterior door handle.
- b. The operator of the vehicle was under the influence of a controlled substance and possessed a physical amount of the substance during the inspection.

5. At the time of the random inspection, the vehicle was engaged in taxi (call or demand) service. Respondent does not have such authority.

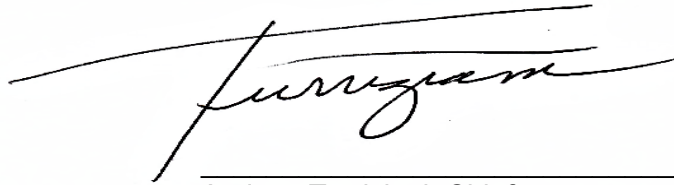
6. That Respondent, by transporting persons, in taxi service, between points in Pennsylvania for compensation without call or demand operating authority with this Commission, violated the Public Utility Code, 66 PA.C.S. §1102. The penalty for this violation is \$1,000.

7. That Respondent by operating a vehicle without an exterior door handle has violated 52 Pa. Code §29.402(2) and 67 Pa. Code §175.77(f). The penalty for this violation is \$100.

8. That Respondent, by employing a driver found to be using a controlled substance while operating a taxi, violated 52 Pa. Code §29.507 and 75 Pa. C.S. §3802(d). The penalty for this violation is \$1,000.00.

WHEREFORE, the Bureau of Investigation and Enforcement hereby requests that the Commission fine Keystone Transportation, LLC, the sum of two thousand one hundred dollars (\$2,100.00) for the illegal activity described in this Complaint and order such other remedy as the Commission may deem to be appropriate.

Respectfully submitted,


A handwritten signature in black ink, appearing to read "Turriziani", is written over a horizontal line. The signature is fluid and cursive.

Andrew Turriziani, Chief  
Motor Carrier Enforcement  
Bureau of Investigation and Enforcement

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 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: 9 June 2023

A handwritten signature in black ink, appearing to read "Turriziani", is written over a horizontal line. The signature is fluid and cursive.

Andrew Turriziani, Chief  
Motor Carrier Enforcement  
Bureau of Investigation and Enforcement

## NOTICE

- A. 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, 2<sup>nd</sup> Floor  
Harrisburg, PA 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:

Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
400 North Street, 3<sup>rd</sup> Floor  
Harrisburg, PA 17120

Or, **e-mailed to:** [RA-PCCmplntResp@pa.gov](mailto:RA-PCCmplntResp@pa.gov)

- B. 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.
- C. 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, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

- D. 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 proceedings shall be closed.
- E. 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.

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