

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION :  
BUREAU OF INVESTIGATION AND ENFORCEMENT :

v. :

RAISER – PA LLC :  
ATTN: REGULATORY LEGAL :  
UBER 3 WORLD TRADE CENTER :  
175 GREENWICH ST FLOORS 43-47 :  
NEW YORK NEW YORK 10007 :

DOCKET NO. C-2023-3042897

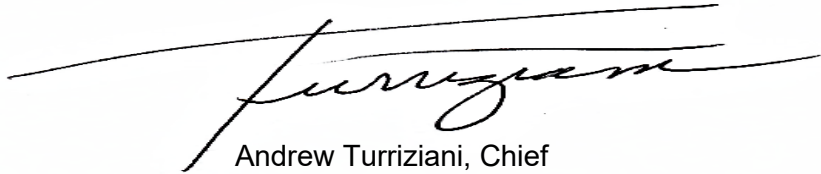
COMPLAINT

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 Prosecutory Staff hereby represents as follows:

1. That Raiser – PA, LLC, Respondent, maintains its principal place of business at Uber 3 World Trade Center, 175 Greenwich Street, Floors 43-47, New York, New York, 10007.
2. That Respondent was issued a license by this Commission on January 26, 2017, at Application Docket No. A-2016-2580821, authorizing transportation of persons for compensation in Transportation Network Company service.
3. That Respondent, on September 9, 2023, permitted a certain 2007 Toyota bearing Pa. registration number LKN2651 and having Vehicle Identification No. ending in the last 4 digits 0812 to be operated by driver Ahmed Ghareib Moustafa.
4. That the vehicle described in paragraph 3 was inspected on the date specified by PUC Motor Carrier Enforcement Officer Joshua Corney on Hastings Road, College Township, Centre County, Pennsylvania. The vehicle did not have the company placard displayed in the windshield and was operating with individuals (6) greater than the number of seat belts (5) installed in the vehicle, including the driver.
5. That Respondent, by allowing a vehicle to operate while not having the proper company placard displayed on the vehicle as specified by the Commission, violated 66 Pa. C.S. §2605(b)(8). The fine for this violation is \$50.00.
6. That Respondent, by allowing a vehicle to operate with passengers in greater number than the vehicle seat belt count, has violated 66 PA C.S 2626(a). The penalty for this violation is \$100.00.

WHEREFORE, the Bureau of Investigation and Enforcement hereby requests that the Commission fine Raiser - PA, LLC, the sum of one hundred and fifty dollars (\$150.00) for the illegal activity described in this Complaint and order such other remedy as the Commission may deem to be appropriate.

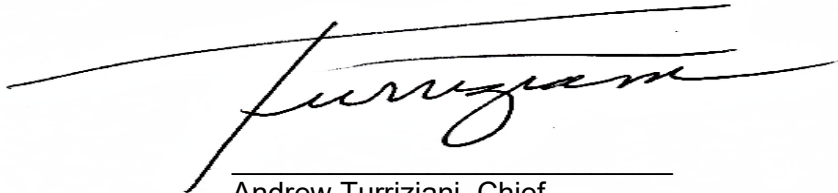
Respectfully submitted,



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.



Date: 3 October 2023

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

**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 proceeding 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.