

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION :  
BUREAU OF INVESTIGATION AND :  
ENFORCEMENT :

v. :

DOCKET NO. C-2023-3043577

LYFT INC :  
184 BERRY STREET, SUITE 5000 :  
SAN FRANCISCO, CA 94107 :

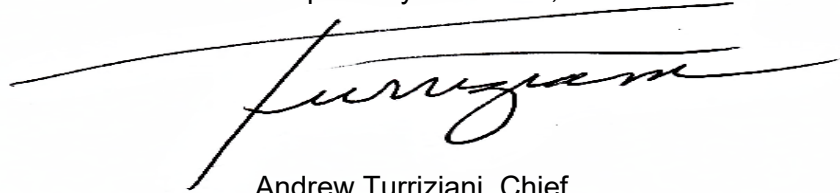
COMPLAINT

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 Lyft, Inc., Respondent, maintains its principal place of business at 185 Berry Street, Suite 5000, San Francisco, California, 94107.
2. That Respondent was issued a license by this Commission on February 9, 2017, at PUC utility code number 6416471, authorizing transportation of persons for compensation from one point to another within Pennsylvania in Transportation Network Company service.
3. That Respondent, on 14 October 2023, permitted a certain 2020 Honda CR-V bearing registration number MCK8814 and having vehicle identification no. the last 4 digits being 5667 to be operated by driver Justin Danner.
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, PA. The vehicle did not have the company placard displayed in the windshield.
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.

WHEREFORE, the Bureau of Investigation and Enforcement Prosecutory Staff hereby requests that the Commission fine Lyft Inc. the sum of fifty dollars (\$50.00) for the illegal activity described in this Complaint and order such other remedy as the Commission may deem to be appropriate.

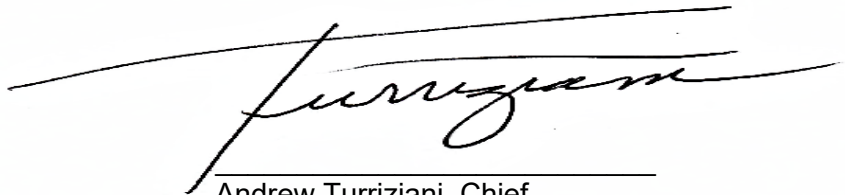
Respectfully submitted,



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: 7 November 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  
P.O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

**Or may be sent by overnight delivery to:**  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, Pennsylvania 17120

**Additionally, a copy should either be mailed to:**

Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

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  
P.O. Box 3265  
Harrisburg, PA 17105-3265
- 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.