



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

May 14, 2025

Via Electronic Filing

Matthew L. Homsher, 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.
Keystone Cab Service, Inc.
Docket No. C-2025-
I&E Formal Complaint

Dear Secretary Homsher:

Enclosed for electronic filing please find the Formal Complaint of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission in the above-referenced matter.

Copies are being served on the parties of record in accordance with the attached Certificate of Service.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Rosul', written over a light blue horizontal line.

Grant Rosul
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 318204
(717) 783-5243
grosul@pa.gov

GR/ac
Enclosures

cc: Michael L. Swindler, Deputy Chief Prosecutor, I&E-Enforcement (*via email*)
As per Certificate of Service

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 date as indicated at the top of the Secretarial Letter. *See* 52 Pa. Code § 1.56(a). The Answer must raise all factual and legal arguments that you wish to claim in your defense, include the docket number of this Complaint, and be verified.

In Addition to filing your Answer with the Commission’s Secretary, please electronically serve a copy on:

Grant Rosul, Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
grosul@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 an Order imposing the civil penalty and other requested relief.

C. You may elect not to contest this Complaint by paying the civil penalty within twenty (20) days and performing the corrective actions, if any, set forth in the requested relief. A certified check, cashier’s check or money order should be payable to the “Commonwealth of Pennsylvania” and mailed to:

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Your payment is an admission that you committed the alleged violations and an agreement to cease and desist from committing further violations. Upon receipt of your payment, the Complaint proceeding shall be closed.

D. If you file an Answer, which either admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request the Commission to issue an Order imposing the civil penalty and granting the requested relief as set forth in the Complaint.

E. If you file an Answer which contests the Complaint, the matter will proceed before the assigned presiding Administrative Law Judge for hearing and decision. The Judge is not bound by the penalty set forth in the Complaint, and may impose additional and/or alternative penalties as appropriate.

F. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code § 1.21.

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
Keystone Cab Service, Inc.,	:	
Respondent	:	

FORMAL COMPLAINT

NOW COMES the Pennsylvania Public Utility Commission’s (“Commission”), Bureau of Investigation and Enforcement (“I&E”), by its prosecuting attorneys, pursuant to Section 701 of the Pennsylvania Public Utility Code (“Code”), 66 Pa.C.S. § 701, and files this Formal Complaint against Keystone Cab Service, Inc. (“Keystone Cab” or “Respondent”) alleging violations of the Commission’s regulations at 52 Pa. Code §§ 29.314, 29.504, and 29.505, requiring that all call or demand vehicles be equipped with fully functioning meters that are plainly visible to all occupants of the vehicle at all times and maintaining driver history and criminal background reports. In support of its Complaint, I&E respectfully represents the following:

I. PARTIES AND JURISDICTION

1. The Pennsylvania Public Utility Commission (“Commission”), with a mailing address of 400 North Street, Harrisburg, PA 17120, is a duly constituted agency of the Commonwealth of Pennsylvania authorized and obligated by Section 501(a) of the Code, 66 Pa.C.S. § 501(a), to execute and enforce the provisions of the Code.

2. Complainant's prosecuting attorneys are as follows:

Grant Rosul
Prosecutor
grosul@pa.gov
(717) 783-5243

Michael L. Swindler
Deputy Chief Prosecutor
mwindler@pa.gov

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
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3. Section 701 of the Code, 66 Pa.C.S. § 701, authorizes the Commission to, *inter alia*, hear and determine complaints alleging a violation of any law or regulation that the Commission has jurisdiction to administer.

4. Section 3301 of the Code, 66 Pa.C.S. § 3301, authorizes the Commission to impose civil penalties on any public utility or on any other person or corporation subject to the Commission's authority for violations of the Code, the Commission's regulations, or both. Section 3301 allows for the imposition of a fine for each violation and each day's continuance of such violation(s). 66 Pa.C.S. § 3301.

5. Respondent is a "common carrier by motor vehicle" as that term is defined in Pa.C.S. § 102 as it is engaged in "holding out, offering, or undertaking, directly or indirectly, service for compensation to the public for the transportation of passengers or property, or both, or any class of passengers or property, between points within this Commonwealth" by motor vehicle.

6. Respondent is a “public utility” as that term is defined at 66 Pa.C.S. § 102 as it is engaged in transporting passengers or property as a common carrier, with its principal place of business at 2304 Walnut Street, Harrisburg, PA 17103.

7. Respondent, as a common carrier by motor vehicle, is subject to the power and authority of the Commission pursuant to Section 501(c) of the Code, 66 Pa.C.S. § 501(c), which requires a public utility to comply with Commission regulations and orders.

8. Pursuant to the provisions of the applicable Commonwealth statutes and regulations, the Commission has jurisdiction over the subject matter of this Complaint and the actions of Respondent related thereto.

II. BACKGROUND

9. On August 8, 2024, Keystone Cab provided a ride to a passenger from Harrisburg International Airport to the passenger’s residence in Mechanicsburg.

10. Upon arrival at the passenger’s destination, the driver quoted the passenger a price of \$85.00 for the ride.

11. When the passenger questioned the fare, the driver was unable to justify the price and decreased the fare to \$75.00.

12. The passenger paid for the transaction by credit card and the merchant was identified as “Good Cab” on the passenger’s credit card statement.

13. Subsequently, on August 12, 2024, the passenger filed a complaint with the Commission stating that the taxi that provided the ride did not have a meter.

14. Additionally, the passenger complained that Keystone Cab overcharged for the August 8, 2024, ride.

15. The passenger also provided a photograph of the Pennsylvania registration plate, bearing the registration TX51367, for the vehicle which provided the ride.

16. Upon investigation by the Bureau of Investigation's Motor Carrier Division, it was discovered that the vehicle was registered to Keystone Cab.

17. On September 11, 2024, Motor Carrier Officers conducted an annual inspection of Keystone Cab.

18. During the September 11 inspection, Maher S. Ahmed ("Maher"), the owner of Keystone Cab, identified the driver of the taxi bearing registration plate TX51367 during the August 8, 2024, ride giving rise to the instant complaint.

19. Maher advised that the driver is no longer employed by Keystone Cab.

20. Driver qualification records were requested by the Motor Carrier Officers, but neither the driver history record nor the criminal history record were provided.

21. Keystone Cab's effective tariff at the time of the August 8, 2024, ride giving rise to the passenger complaint was as follows:

- a) First 1/7 mile or fraction thereof: \$1.40;
- b) Each additional 1/7 mile or fraction thereof: \$0.20;
- c) Waiting time – each minute: \$0.20.

22. Given Keystone Cab's tariffed rate, the Motor Carrier Division calculated that the August 8, 2024, ride should have cost a total of \$35.20.

23. Based on this calculation, Keystone Cab overcharged the passenger of the August 8, 2024, ride by more than double the tariffed rate.

III. ALLEGED VIOLATIONS

24. All allegations in paragraphs 1-24 are incorporated as if fully set forth herein.

Count 1 – Failure to Equip a Meter

25. As a call or demand service, Respondent’s taxi cabs are required to be equipped with a meter, and the meter must be installed in the front of the vehicle so that, at all times, it is plainly visible to, and the fare readily ascertainable by, all occupants of the vehicle. However, a passenger who rode in one of the Respondent’s taxis, bearing registration plate TX51367, identified that vehicle as lacking a meter compliant with the Commission’s regulation.

If proven, this is a violation of Sections 29.314(b)(1)-(2) of the Commission’s regulations, 52 Pa. Code § 29.314(b)(1)-(2).

The civil penalty requested by I&E for this violation is \$1,000.

Count 2 – Failure to Calculate Fare in Accordance with Tariff

26. As a call or demand service, Respondent is required to cause its meters to be so regulated that the fare is calculated and registered in accordance with the current tariff rates on file with and approved by the Commission.

Here, a passenger was charged \$75.00 — after an attempt by Keystone Cab to have the passenger pay \$85.00 — even though the Respondent’s tariff rate would only have permitted it to charge the passenger \$35.20 for the August 8, 2024, trip.

If proven, this is a violation of Section 29.314(b)(6) of the Commission's regulations, 52 Pa. Code § 29.314(b)(6).

The civil penalty requested by I&E for this violation is \$500.

Count 3 – Meter not in operation for entire time vehicle engaged by passenger

27. As a call or demand service, the meters in Respondent's taxis must be in operation during the entire time the vehicle is engaged by a passenger, and the passenger shall be required to pay only the amount recorded by the meter.

Here, the passenger identified that there was no meter in the vehicle during the August 8, 2024, trip.

If proven, this is a violation of Section 29.314(b)(7) of the Commission's regulations, 52 Pa. Code § 29.314(b)(7).

The civil penalty requested by I&E for this violation is \$1,000.

Count 4 – Failure to Maintain a Copy of the Driver History Report

28. As a call or demand service, Respondent was required to obtain and review a driving history research report for its driver from the Department of Transportation and other relevant sources prior to employing him and further was required to maintain a copy of the driver history report for two years.

Here, Keystone Cab did not have a copy of the driver history report for the driver of the vehicle bearing registration plate TX51367 during the August 8, 2024, trip.

If proven, this is a violation of Section 29.504(b) of the Commission regulations, 52 Pa. Code § 29.504(b).

The civil penalty requested by I&E for this violation is \$500.

Count 5 – Failure to Maintain a Copy of the Driver Criminal Background Report

29. As a call or demand service, Respondent is required to conduct or have a third party conduct a local and National criminal background check for each driver applicant and to maintain a copy of that background check for three (3) years.

Here, Keystone Cab did not maintain a copy of the driver criminal background report for the driver in question. When asked to provide a copy of the criminal background report for this driver by the Motor Carrier Division, Keystone Cab did not provide it.

The civil penalty requested by I&E for this violation is \$500.

IV. RELIEF REQUESTED:

30. Based on the foregoing allegations, the Bureau of Investigation and Enforcement hereby requests that:

- a. Keystone Cab Service, Inc. be ordered to equip its vehicles with properly functioning meters pursuant to Section 29.314 of the Commission’s regulations, 52 Pa. Code § 29.314, and to follow Commission regulations governing the functioning and use of meters;
- b. Keystone Cab Service, Inc. be ordered to prepare and maintain accurate driver history and criminal background report records for all drivers pursuant to Sections 29.504(b) and 29.505(b) of the Commission’s regulations, 52 Pa. Code §§ 29.504(b) and 29.505(b);
- c. Keystone Cab Service, Inc. be ordered to pay a civil penalty in the amount of Three Thousand Five Hundred Dollars (\$3,500). Said payment shall be made within thirty (30) days of the date of entry of the Commission’s Final Order in this case;
- d. Keystone Cab Service, Inc. be ordered to refund the passenger of the August 8, 2024, trip the \$75.00 unlawfully charged;

- e. The Commission grant such other relief as the Commission deems appropriate.

WHEREFORE, for all the foregoing reasons, the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission respectfully requests that, after consideration of the record, the Office of Administrative Law Judge and the Commission find Keystone Cab Service in violation of the counts as set forth herein and grant the relief specified above.

Respectfully submitted,



Grant Rosul
Prosecutor
PA Attorney ID No. 318204

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(717) 783-5243
grosul@pa.gov

Date: May 14, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
Keystone Cab Service, Inc.,	:	
Respondent	:	

VERIFICATION

I, Brian Mehus, Chief of the Pennsylvania Public Utility Commission’s Bureau of Investigation and Enforcement, Motor Carrier Enforcement, 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 of Investigation and Enforcement 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.



Brian Mehus, Chief
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Motor Carrier Enforcement
400 North Street
Harrisburg, PA 17120

Date: May 14, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Complainant	:	
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Respondent	:	

CERTIFICATE OF SERVICE

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

Service by Certified Mail and Electronic Mail

Keystone Cab Service, Inc.
Attn: Maher S. Ahmed
2304 Walnut Street
Harrisburg, PA 17103
aaakeystone@gmail.com



Grant Rosul
Prosecutor
PA Attorney ID No. 318204
Bureau of Investigation and Enforcement
(717) 783-5243
grosul@pa.gov

Dated: May 14, 2025