

NOTICE OF MOTOR CARRIER COMPLAINT

- 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 should 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 **mailed to:**

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Or you may **eFile your Answer** using the Commission's website at www.puc.pa.gov. The link to eFiling is located under the Filing and Resources tab on the homepage. If your Answer exceeds 250 pages, you must also file a paper copy with the Secretary's Bureau.

In addition to filing your Answer with the Commission's Secretary, a copy should either be

Mailed to: Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 3W
Harrisburg, PA 17120

Or, E-mailed to: 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 such remedy.
- C. If applicable, 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 "Commonwealth of Pennsylvania"** and should be forwarded to:

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd 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 fine and/or other such remedy.
- F. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge (ALJ) for hearing and decision. The ALJ 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.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION, BUREAU OF INVESTIGATION	:	
AND ENFORCEMENT	:	
	:	
v.	:	Docket No. C-2025-3057011
	:	
LYFT INC	:	
185 BERRY STREET, SUITE 400	:	
SAN FRANCISCO, CA 94107	:	

MOTOR CARRIER 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 - Motor Carrier Division hereby represents as follows:

1. That LYFT INC, Respondent, maintains its principal place of business at 185 Berry Street, Suite 400, San Francisco, California, 94107.
2. That Respondent was issued a license by this Commission on February 9, 2017, at Application Docket No. A-2017-2583947, PUC Utility Code 6416471, authorizing transportation of persons for compensation within Pennsylvania in Transportation Network Company (“TNC”) service.
3. That Respondent, on August 13, 2025, permitted a certain 2018 Toyota bearing PA registration number LNK1191 and having vehicle identification number ending in the last 4 digits 5299 to be operated by driver Sean Paul Zipf.
4. That the vehicle described in numbered paragraph 3, above, was inspected on that date by PUC Motor Carrier Enforcement Officer Mia Fuller in the extended lot-Uber/Lyft, Findlay Township, Allegheny County. Officer Fuller determined that at the time of the inspection, the driver of the vehicle in question was smoking while logged into the TNC’s digital network.
5. That Respondent, by allowing a driver to operate a vehicle engaged in TNC service while smoking, violated 66 Pa.C.S. §2605(b)(9). The fine for this violation is \$250.

WHEREFORE, the Bureau of Investigation and Enforcement hereby requests that the Commission fine LYFT INC the sum of two hundred fifty dollars (\$250.00) for the illegal activity described in this Complaint and order such other remedy as the Commission may deem to be appropriate.

Respectfully submitted,



Brian B. Mehus, Chief
Motor Carrier Enforcement
Bureau of Investigation and Enforcement
400 North Street 2nd Floor
Harrisburg, PA 17120

VERIFICATION

I, Brian B. Mehus, 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: 29 September 2025

Brian B. Mehus, Chief
Motor Carrier Enforcement
Bureau of Investigation and Enforcement