



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

October 17, 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.  
Lyft Inc  
Docket No. C-2025-3054170  
**I&E Petition for Withdrawal of Formal Complaint**

Dear Secretary Homsher:

Enclosed for electronic filing please find the **Non-Proprietary** version of the Bureau of Investigation and Enforcement's ("I&E") Petition for Withdrawal of Formal Complaint in the above-referenced proceeding. The **Proprietary** version has been submitted to the Secretary's Bureau via its ShareFile.

Copies have been served on the parties of record in accordance with the Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Samantha N. Barbush". The signature is written in a cursive, flowing style.

Samantha N. Barbush  
Prosecutor  
Bureau of Investigation & Enforcement  
PA Attorney ID No. 331654  
(717) 772-8582  
[sbarbush@pa.gov](mailto:sbarbush@pa.gov)

SNB/ac  
Enclosures

cc: Allison Kaster, Chief Prosecutor, I&E (via email – [akaster@pa.gov](mailto:akaster@pa.gov))  
Brian Mehus, Chief, Motor Carrier (via email – [bmehus@pa.gov](mailto:bmehus@pa.gov))  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3054170
	:	
Lyft Inc	:	
	:	
Respondent	:	

**PETITION FOR WITHDRAWAL OF FORMAL COMPLAINT**

Pursuant to 52 Pa. Code §5.94, the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Investigation and Enforcement (“I&E”), by its prosecuting attorney, files this Petition for Withdrawal of I&E’s Formal Complaint (“Complaint”). In support thereof, I&E respectfully represents as follows:

1. I&E commenced this action on April 30, 2025, by filing a Complaint alleging that Respondent allowed a vehicle to be operated with an expired Pennsylvania inspection decal, in violation of 52 Pa. Code §29.405 and 66 Pa. Code §2606(c).
2. On April 30, 2025, the Complaint was served upon Respondent by certified mail.
3. Attached to the Complaint was a Notice advising the Respondent that it must file an Answer within twenty (20) days of service of the Complaint.
4. No response was received from Respondent.
5. On August 9, 2025, the Complaint was published in the PA Bulletin.
6. On September 26, 2025, Respondent provided an Affidavit affirming that the vehicle cited in the Complaint was not operating under Respondent’s certificate or

permit on the date cited in the Complaint, which is attached hereto as Attachment A  
(Confidential).

7. Based upon information provided by Respondent's Affidavit, the facts and circumstances of this case, as I&E understands them, have changed.

8. In the interest of justice, I&E desires to withdraw the Complaint that was filed in this matter.

**WHEREFORE**, I&E respectfully petitions the Commission for leave to withdraw the Formal Complaint in this matter pursuant to 52 Pa. Code §5.94.

Respectfully submitted,



Samantha N. Barbush  
Prosecutor  
PA Attorney ID No. 331654

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(717) 772-8582  
[sbarbush@pa.gov](mailto:sbarbush@pa.gov)

Date: October 17, 2025

**I&E Attachment A**  
**CONFIDENTIAL**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3054170
	:	
Lyft Inc	:	
Respondent	:	

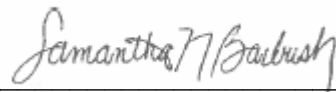
**CERTIFICATE OF SERVICE**

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 Electronic Mail**

**Proprietary and Non-Proprietary Versions**

Lyft Inc  
185 Berry Street  
Suite 400  
San Francisco, CA 94107  
[marketcompliance@lyft.com](mailto:marketcompliance@lyft.com)



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Samantha N. Barbush  
Prosecutor  
PA Attorney ID No. 331654  
Bureau of Investigation and Enforcement  
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Date: October 17, 2025