

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION,	:	
BUREAU OF INVESTIGATION AND ENFORCEMENT	:	
	:	
v.	:	DOCKET NO. C-2026-3054694
	:	
MICHAEL SULLIVAN	:	
T/A KCS LUXURY CAR SERVICE/KCS PRIVATE	:	
TRANSPORTATION/KCS TRANSPORTATION	:	
281 DEERFIELD COURT	:	
NEW HOPE, PA 18938	:	

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 MICHAEL SULLIVAN, T/A KCS LUXURY CAR SERVICE, KCS PRIVATE TRANSPORTATION, and/or KCS TRANSPORTATION, (Collectively, Respondent), maintains its principal address at 281 Deerfield Court, New Hope, PA 18938-0026.
2. That a certificate of public convenience issued by this Commission is required to transport passengers for compensation within the Commonwealth of Pennsylvania. Based on review of records maintained by the Commission, Michael Sullivan, KCS Luxury Car Service, KCS Private Transportation, and/or KCS Transportation have not applied for or ever received a certificate of public convenience for passenger transportation services by this Commission.
3. That on or around August 6, 2024, PUC Motor Carrier Enforcement Officer Brian Carpenter, in response to an informal complaint, investigated Respondent and determined that Respondent was operating as an uncertificated luxury car service. Officer Carpenter contacted Respondent, by telephone, informing Respondent of the informal complaint and violation. Officer Carpenter provided instructions for obtaining PUC authority and advised Respondent to cease and desist operations until said PUC authority was granted. A subsequent Warning Letter, docketed at Bp8#3050236, was issued on September 3, 2024, containing the same information.
4. That on or around October 27, 2025, Officer Carpenter, in response to another informal complaint, investigated Respondent and determined that Respondent was still operating as an uncertificated luxury car service. Officer Carpenter attempted to contact Respondent by email without success.
5. That on or around November 17, 2025, Officer Carpenter contacted Respondent using the telephone number listed online for “KCS Private Transportation and spoke with “Mike”. Officer Carpenter requested transportation for November 20, 2025, from the Parx Casino, Bensalem, Bucks County to The Capital Grille, Philadelphia, Philadelphia County, for two to four passengers. Mike confirmed availability for a one-way trip, quoting \$195 plus gratuity. An invoice was sent for that amount listing the company name “KCS Transportation” with an address of PO Box 26, New Hope, PA. 18938.

6. That Respondent, by advertising passenger transportation services by vehicle for compensation without obtaining/holding a certificate/authority from the Commission, has violated 66 Pa. C.S. §1101, 1102(a), and 3310(a). The penalty for this violation is \$1,000.

WHEREFORE, the Bureau of Investigation and Enforcement hereby requests that:

1. MICHAEL SULLIVAN, T/A KCS LUXURY CAR SERVICE/KCS PRIVATE TRANSPORTATION/KCS TRANSPORTATION, be ordered to pay a civil penalty of one thousand dollars (\$1,000.00) for the above-described violations set forth in this Complaint and order such other remedy as the Commission may deem to be appropriate.
2. Respondent be directed to cease and desist from transporting passengers between points in Pennsylvania for compensation until such time as the proper authority has been granted by the Commission.
3. If payment of the civil penalty is not made, the Bureau of Investigation and Enforcement requests that:
 - a. The Commission certify motor vehicle registrations to the Pennsylvania Department of Transportation for suspension or revocation, pursuant to 75 Pa. C.S. §1375 and
 - b. The matter be referred to the Pennsylvania Office of Attorney General for appropriate action.

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 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.



Date: 23 February 2026

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