

NOTICE OF 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 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 civil penalty, the suspension or revocation of your operating authority, or other such remedy.
- C. You may elect not to contest this Complaint by paying the civil penalty requested in this Complaint by certified check or money order. **Payment must be made to "Commonwealth of Pennsylvania"** and 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 civil penalty 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 requested civil penalty.
- 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-2026-3059929

READING CITY CAB LLC :
620 SOUTH 13TH STREET :
HARRISBURG, PA 17104 :

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 READING CITY CAB LLC, Respondent, maintains its principal place of business at 620 South 13th Street, Harrisburg, PA 17104.

2. That on September 11, 2027, Respondent was issued a certificate of public convenience by this commission to transport, as a common carrier, persons, upon call and demand, in the counties of Berks and Lancaster at PUC Utility Code 6318426.

3. That on January 20, 2026, PUC Motor Carrier Enforcement Officer Travis Griffith conducted a random inspection at 351 Chestnut Street, Harrisburg, Dauphin County of a 2014 Dodge passenger vehicle, bearing PA registration number TX51970 and having the vehicle identification numbers ending in the last 4 digits 7725 operated by driver Tanya Simpson. At the time of inspection, the following violations were found:

- a. Taxi was being operated in Dauphin County while Respondent’s authority is for Berks and Lancaster Counties only, violating 66 Pa. C.S. §§1102(a)(1), §3310. The penalty for this violation is \$500.
- b. Taxi failed to display Respondent’s name and associated PUC certificate of convenience number, as the name and number were that of a cancelled taxi authority, violating 52 Pa. Code §29.71(a). The penalty for this violation is \$50.
- c. The wheel nut/bolt for the front, drivers side tire was missing, violating 52 Pa. Code §29.402(1); 67Pa. Code§175.80(e)(1)(xii). The penalty for this violation is \$100.
- d. Taxi failed to display consumer information decal, a the consumer information decal identified a carrier other than Respondent, violating 52 Pa. Code §29.318. The penalty for this violation is \$50.
- e. Driver was smoking in vehicle upon inspection, violating 52 Pa. Code §29.403(10). The penalty for this violation is \$250.

WHEREFORE, the Bureau of Investigation and Enforcement hereby requests that the Commission impose a civil penalty of nine hundred fifty (\$950.00) upon READING CITY CAB LLC, for the violations 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: 3 March 2026

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