

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 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 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-2026-3059973
KEYSTONE TRANSPORTATION LLC :
2304 WALNUT STREET :
HARRISBURG, PA 17103 :

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 KEYSTONE TRANSPORTATION LLC, Respondent, maintains its principal place of business at 2304 Walnut Street, Harrisburg, PA 17103.

2. That on November 13, 2020, Respondent was issued a certificate of public convenience by this Commission for paratransit authority among various counties in Pennsylvania to points in Pennsylvania and return, at PUC Utility Code 6418669.

3. That on January 7, 2026, PUC Motor Carrier Enforcement Officer Travis Griffith conducted a random inspection at the intersection of South 18th Street and Berryhill Street, Harrisburg, Dauphin County, of a 2012 Chrysler van, bearing PA registration number BA91671, and having vehicle identification number ending in the last 4 digits 0178, operated by driver, Chester Carter, Jr. At the time of inspection, the vehicle displayed a dome light affixed to the top of the vehicle and was equipped with a meter. The following violations were found:

- a. Vehicle failed to display Respondent’s name and associated PUC certificate of convenience number, violating 52 Pa. Code §29.71(a). The penalty for this violation is \$50.
- b. Respondent employed a driver who was found to be disqualified to operate the vehicle due to criminal history, including a 2001 first-degree felony conviction of Chester Carter, Jr. for involuntary deviate sexual intercourse by forcible compulsion, violating 52 Pa. Code §29.505(a)(3). The penalty for this violation is \$1000.

WHEREFORE, the Bureau of Investigation and Enforcement hereby requests that the Commission impose a civil penalty of one thousand fifty dollars (\$1050.00) upon KEYSTONE TRANSPORTATION 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: 5 March 2026

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