

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. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code §1.21.
- H. 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-2026-3062152

KEYSTONE CAB SERVICE, INC :
2304 A 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 CAB SERVICE INC, Respondent, maintains its principal place of business at 2304 Walnut Street, Harrisburg, PA 17103.
2. That on September 2, 2026 Respondent was issued a certificate of public convenience by this Commission to transport, as a common carrier, by motor vehicle, persons in call or demand service at Application Docket No. A-00118552, PUC Utility Code A-632090.
3. That on April 29, 2026, PUC Motor Carrier Enforcement Officer Travis Griffith conducted a random inspection at the Harrisburg Train Station near the intersection of Market and Aberdeen Streets, Harrisburg, Dauphin County, of a 2018 Toyota passenger vehicle, bearing PA registration number TX52097 and having the vehicle identification number ending in the last 4 digits 3075, operated by driver Ilyas Ahmed Dudevah. At the time of inspection, the following violations were found:
 - a. Taxicab odometer displayed 350,990 miles, violating 52 Pa. Code §29.314(c). The penalty for this violation is \$500.
 - b. Taxicab failed to display the consumer information decal, violating 52 Pa. Code §29.318. The penalty for this violation is \$50.
 - c. Taxicab failed to display the rate of fare, violating 52 Pa. Code §29.316(a)(1)(i). The penalty for this violation is \$50

WHEREFORE, the Bureau of Investigation and Enforcement hereby requests that the Commission impose a civil penalty of six hundred dollars (\$600.00) upon KEYSTONE CAB SERVICE, INC, for the violations described in this Complaint and order such other remedy as the Commission may deem to be appropriate. If payment of the civil penalty is not made, the Bureau of Investigation and Enforcement requests that the Bureau of Administration, Financial & Assessments Office, be directed to refer the matter to the Pennsylvania Office of Attorney General for collection of the civil penalty

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: 16 June 2026



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