



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

February 27, 2015

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission, Bureau of Investigation
and Enforcement v. Uber Technologies, Inc., Rasier LLC, Gegen
LLC and Rasier-PA LLC Docket No. C-2014-2422723

Dear Secretary Chiavetta:

On January 9, 2015, the Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement (I&E) filed an Amended Complaint in the above-docketed matter. I&E's Amended Complaint updates the parties named as Respondents to be Uber Technologies, Inc., Rasier LLC, Gegen LLC and Rasier-PA LLC, (collectively referred to as Uber Technologies, Inc., *et al.*), as well as updates and quantifies the violations alleged and recalculates the appropriate civil penalty as the relief requested.

At the time of its filing, I&E served its Amended Complaint with certificate of service and notice to plead upon counsel for Uber Technologies, Inc. Pursuant to Ordering Paragraph 4 of the Interim Order Regarding Various Procedural Matters of Administrative Law Judges Mary D. Long and Jeffrey A. Watson dated February 24, 2015, I&E hereby serves a copy of its Amended Complaint with an updated Notice to Plead upon Gegen LLC and upon counsel for Uber Technologies, Inc., *et al.* It is believed that counsel for Uber Technologies, Inc. is also counsel for Gegen LLC. Copies have been served in accordance with the Certificate of Service.

Should you have any questions, please contact me at (717) 783-6369.

Sincerely,

Michael L. Swindler,
Stephanie M. Wimer
Prosecutors

Enclosures

cc: Honorable Mary D. Long
Honorable Jeffrey A. Watson
As per Certificate of Service

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|--|---|---------------------------|
| Pennsylvania Public Utility | : | |
| Commission, Bureau of | : | |
| Investigation and Enforcement | : | |
| v. | : | Docket No. C-2014-2422723 |
| | : | |
| Uber Technologies, Inc., <i>et al.</i> | : | |

NOTICE

A. You, **Gegen LLC**, must file an Answer to the Amended Complaint within twenty (20) days of the date of the Interim Order Regarding Various Procedural Matters of Administrative Law Judges Mary D. Long and Jeffrey A. Watson dated February 24, 2015 pursuant to Ordering Paragraph 4 of said Order. An Answer is a written explanation of circumstances wished to be considered in determining the outcome. The Answer shall 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 **shall be mailed to:**

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Or may be sent by overnight delivery to:
400 North Street, 2nd Floor
Harrisburg, Pennsylvania 17120

Additionally, please serve a copy on:

Wayne T. Scott, First Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, Pennsylvania 17105-3265

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 fine, the suspension or revocation of your certificate of public convenience or other remedy.

C. You may elect not to contest this complaint by paying the fine proposed in this Complaint by certified check or money order only. Payment must be made to the **Commonwealth of Pennsylvania** and should be forwarded to:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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.

D. If you file an Answer, which admits or fails to deny the allegations of the Complaint, the Bureau of Transportation and Safety will request that the Commission issue a Secretarial Letter imposing a penalty.

E. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision. The judge is not bound by the optional fine set forth above.

F. If you have questions regarding this Complaint or if you would like an alternative format of this Complaint (for persons with disabilities), please contact the Compliance Office at (717) 787-1227.

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 First Class Mail and email (to counsel):

Karen O. Moury, Esq.
Buchanan, Ingersoll and Rooney, P.C.
409 North Second Street
Suite 500
Harrisburg, PA 17101-1357
karen.moury@bipc.com

Gegen LLC
109 South 13th Street
Unit 2S
Philadelphia, PA 19107



Michael L. Swindler
Prosecutor
PA Attorney ID No. 43319

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Bureau of Investigation and Enforcement
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(717) 783-6369

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