



Public Utilities Commission
STATE OF CALIFORNIA

CITATION FOR VIOLATION
OF PUBLIC UTILITIES CODE

To: Avalon Transportation LLC.
Attn: Virgin Fish, Inc.
[REDACTED]

File: TCP 16585-A
Citation#: T.2025-11-005
Date: November 14, 2025
Case #: CSE-518

VIOLATIONS

You are hereby cited with having violated sections of the Public Utilities (Pub. Util.) Code and a California Public Utilities Commission (CPUC) General Order (G.O.) as described below. These violations occurred from May 14, 2025, through September 11, 2025.

- (1) Failed to maintain its Equipment Statement, in violation of G.O. 157-E, Part 4.01. **[4 counts]**
- (2) Failed to enroll [REDACTED] drivers in the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) Program in violation of Pub. Util. Code Section 5374(a)(1)(D), G.O. 157-E Part 5.02, and the California Vehicle Code (CVC) Section 1808.1. **[3 counts]**

STATEMENT OF FACTS

The above violations are documented in the attached Investigation Report, which consists of the carrier's records and substantiating documents obtained from other sources.

RESPONSE

TEB used the Penalty Assessment Methodology adopted in Resolution M-4846 and considered mitigating and exacerbating factors in setting the fine.

You are hereby called upon to answer this citation on or before December 5, 2025. By way of such answer, you may either:

- (1) Pay a fine of \$6,000 pursuant to P.U. Code Section 5378. (Submit your check or money order payable to California Public Utilities Commission using the attached *Citation Agreement*. Upon payment, the fine will be deposited in the State Treasury to the credit of the General Fund, and the Commission staff will deem the matter closed, **or**
- (2) Contact the Supervisor below to make payment arrangements, **or**
- (3) Contest this Citation by filing an Appeal. See attached document "*How to File an Appeal and Instructions for Filing a Notice of Appeal and Certificate of Service for a Citation Appeal.*"

If you fail to respond by December 5, 2025, you will be in default and will have forfeited your right to appeal the Citation. In addition, your operating authority will be immediately suspended and may be subsequently revoked pursuant to Resolution ALJ-187. The Commission may also act through a civil or criminal proceeding to recover any unpaid fine and ensure compliance with applicable statutes and Commission orders.

Eric Hooks

Eric Hooks, Program and Project Supervisor
Consumer Protection and Enforcement Division
Transportation Enforcement Branch
Telephone number: (415) 703-2302
E-mail address Eric.Hooks@cpuc.ca.gov



Public Utilities Commission

STATE OF CALIFORNIA

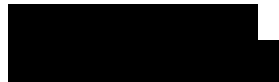
CITATION COMPLIANCE AGREEMENT

File No.: TCP 16585-A
Citation #: T.2025-11-005
Date: November 14, 2025
Case #: CSE-518

I (we) hereby agree to comply with this citation dated November 14, 2025, and herewith pay the fine of \$6,000.

Avalon Transportation LLC.

Attn: Virgin Fish, Inc.



(Signature)

(Title)

(Date)

Payment (cashier check or money order) should be made payable to *California Public Utilities Commission* and sent to:

California Public Utilities Commission
Attn: Fiscal Office
505 Van Ness Avenue
San Francisco, CA 94102-3298

Automatic credit and debit card payments are also available. To arrange for autopay, fill out the attached CREDIT OR DEBIT CARD AUTHORIZATION form and email to our Fiscal Office at FiscalOffice-TECitations@cpuc.ca.gov.

INVESTIGATION REPORT

CARRIER: Avalon Transportation LLC
(California Secretary of State Entity# 200308510013) - Active

MEMBER: Virgin Fish, Inc., Managing Member

AUTHORITY: TCP 16585-A

PHYSICAL ADDRESS:

[REDACTED]

MAILING ADDRESS:

[REDACTED]

PHONE/EMAIL:

[REDACTED]

VEHICLES:

[REDACTED]

EMPLOYEE-DRIVERS:

[REDACTED]

**PL&PD
INSURANCE:**

[REDACTED]
Policy Number: [REDACTED]
Effective Date: [REDACTED]

**WORKERS'
COMPENSATION
INSURANCE:**

[REDACTED]
Policy Number: [REDACTED]
Effective Date: [REDACTED]

**DRUG
CONSORTIUM:**

[REDACTED]

INTRODUCTION

On May 14, 2025, I was assigned to investigate the operations and practices of Avalon Transportation LLC (hereinafter referred to as Avalon Trans). During the Stagecoach Joint Operation with the California Highway Patrol (CHP) on April 24, 2025, [REDACTED] Avalon Trans' vehicles were observed operating without being listed on its equipment list. Furthermore, employee driver [REDACTED] was found not registered in Avalon Trans' California Department of Motor Vehicles (DMV) Employer Pull Notice Program (EPN) [Attachment 1].

VIOLATIONS

The investigation from May 14, 2025, to September 11, 2025, disclosed violations of the following provisions of the Public Utilities (Pub. Util.) Code and the Commission General Order (G.O.):

- **Failed to maintain its Equipment Statement, in violation of G.O. 157-E, Part 4.01 [4 counts].**

A review of Avalon Trans' waybills revealed that the [REDACTED] buses (license plates [REDACTED]) operated as shuttle vehicles, transporting event participants to and from the Stagecoach Music Festival in the surrounding area between April 24 and April 28, 2025 [Attachment 2]. I confirmed in the Transportation Licensing and Analysis Branch's (TLAB) database (TCP portal) that all [REDACTED] buses were not listed in Avalon Trans' equipment list between April 24 and April 28, 2025 [Table 1, Attachment 3].

Table 1 – Vehicle/Equipment List

Vehicle License Plate	TCP Portal Status	Dates Operated
██████	Not added	4/24/2025 – 4/28/2025
██████	Not added	4/24/2025 – 4/28/2025
██████	Not added	4/24/2025 – 4/28/2025
██████	Added after Stagecoach Operation on 8/15/25	4/24/2025 – 4/28/2025

- **Failed to enroll three (3) drivers in the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) Program in violation of Pub. Util. Code Section 5374(a)(1)(D), G.O. 157-E Part 5.02, and the California Vehicle Code (CVC) Section 1808.1 [3 counts]**

On September 11, 2025, I looked up Avalon Trans' DMV Requester Code █████ and confirmed that █████ employee drivers operated during the Stagecoach Music Festival without being enrolled in its EPN program between April 24 to April 28, 2025. [Table 2, Attachment 4].

Table 2 –EPN Status, April 24 – April 28, 2025

Name & Driver's License	Trip Dates	EPN Status
████████████████████	4/24 – 4/28/2025	Not Listed
████████████████████	4/24 – 4/28/2025	Not Listed
████████████████████	4/24 – 4/28/2025	Not Listed

DECLARATION

I have read the foregoing and know the contents thereof and I declare that the foregoing is true and correct, except as to those matters stated on information and belief, and as to those matters, I believe to be true.

Executed on November 14, 2025, in San Francisco, California.

_____ **Mingfeng Li** _____

Mingfeng Li, TEB Enforcement Analyst

List of Attachments

Attachment 1 –04-24-25 Operation Documents

Attachment 2 – Waybills

Attachment 3 – TCP Portal Equipment List

Attachment 4 – EPN Drivers List

Attachment 1

CALIFORNIA PUBLIC UTILITIES COMMISSION INSPECTION OBSERVATION REPORT

Date: 4-24-25

Location: Stagecoach ☒ Airport ☐ Other check box PSC/TCP# 16585 Investigator: Esguerra

Carrier: Avalon Transportation LLC Phone: _____

Address: _____ City: _____ Zip: _____

Driver: _____ (A2) PHL Class: A 240: P

Address: _____ City: _____ Zip: _____

Phone: _____ Relationship with Carrier: ☐ Owner ☐ Employee ☐ Sub-carrier

Years w/company: 6 months ☐ Other _____

Prime carrier: _____

Comments: _____

License Plate #: _____ VIN #: _____

Registered: _____

Address: _____

City: _____ Zip: _____ Phone: _____

Violation(s):

- Vehicle Markings: ☐ TCP # not shown on rear bumper ☐ TCP # not shown on front bumper
☐ No Facility Temp. Band Letter ☐ No Livery Plate or Temp. Livery Plate Letter
☒ PSC/TCP # not on side of vehicle ☐ Carrier's name not on side of vehicle *

*Owner for vehicles with 15 passengers and above or buses > 30 days

- Waybill: ☐ No waybill ☐ Carrier Name - TCP # ☐ Vehicle License Plate #
☐ Driver's name ☐ Time/Date Charter arranged ☐ Origin/Destination
☐ No. of person in the group ☐ Name/address of person arranging charter
☐ Transportation arranged by phone or written contract
☐ Name of at least 1 passenger in traveling party or identification of traveling party's affiliation

- Others: ☐ Vehicle not lined with PUC ☐ License plate on decal does not match vehicle

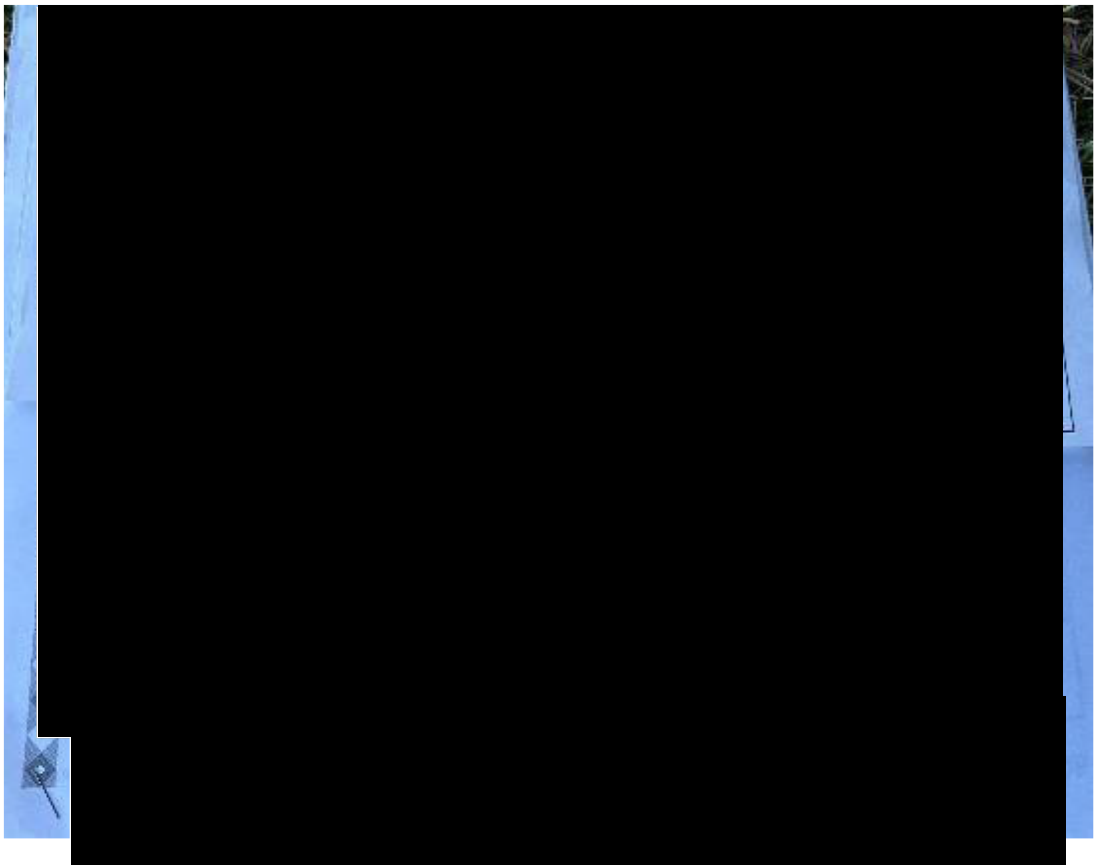
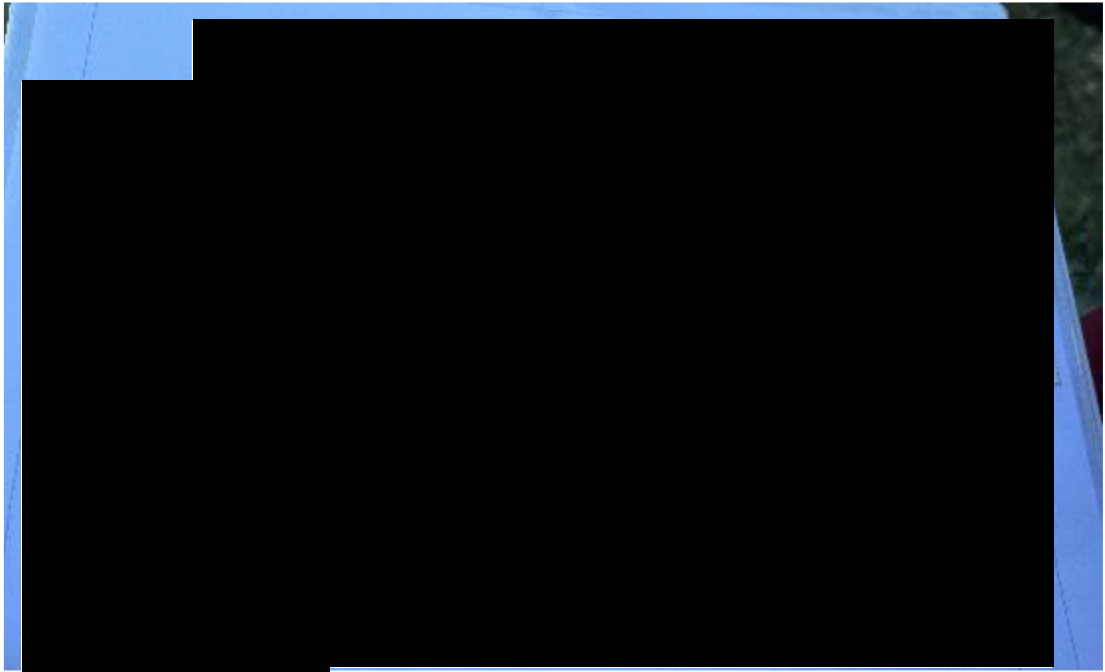
Violation(s): ☒ Yes, as noted above and in comments below ☐ No Violation

CHP/Airport Citation No.: _____

Comments: -TCP# Not on Sides of bus.
- Bus is not listed on equipment list.
Mark Kuratowski

Note: Failure to take corrective action may result in enforcement action including imposition of fines

*** IF DRIVER IS NOT RESPONSIBLE, GIVE NOTICE TO RESPONSIBLE OWNER ***



**CALIFORNIA PUBLIC UTILITIES COMMISSION
INSPECTION OBSERVATION REPORT**

Location: Airport/Other: Stagecoach PSC/TCP/TNC: 16585-A Date: 4/24/25
(Circle one) Investigator: Mary Seki-CPUC

Prime Carrier: Avalon Transportation LLC Phone#: _____
Address: _____ City: _____ Zip: _____

Driver: _____

Address: _____

Phone: _____ Years w/company: 4 years Prime Carrier: _____

Relationship with Carrier: Owner/Employee/Sub-carrier/Other: _____
(Circle one)

Comments: _____

License Plate # _____ Registration Exp.: _____ Seats: _____

Registered Owner: _____ Leased/Owned
(Circle one)

Address: _____

City: _____ Zip: _____ Phone: _____

Violation(s):

- Vehicle:** ☐ TCP # Not shown on rear/front bumper
☒ Vehicle not listed with PUC ☐ No Trade Dress ☐ Front ☐ Rear
☐ PSC/TCP # not on side of vehicle* ☐ Carrier's name not on side of vehicle*
*Exempt for vehicles < 15 passengers incl. driver or leased < 30 days
- Waybill:** ☐ No waybill ☐ Carrier Name /TCP# ☐ Vehicle License Plate #
☐ Driver's Name ☐ Time/Date Charter arranged ☐ Origin/Destination
☐ No. of person in group ☐ Name/address of persons arranging charter
☐ Transportation arranged by phone or written contract
☐ Name of at least 1 passenger in traveling party or identification of traveling party's affiliation
- TNC OPS:** ☐ No Trade Dress ☐ Front ☐ Rear
☐ Profile Non-Match
☐ Lack Proof of Prearranged Ride
☐ Non-State CDL
☐ No Airport Permit

Violation(s): ☒ Yes, as noted above and in comments below ☐ No Violation

Law Enforcement Citation No.: _____

Comments: Not listed on equipment list. Driver is
not listed with the CPUC

Note: Failure to take corrective action may result in enforcement action including imposition of fines

**CALIFORNIA PUBLIC UTILITIES COMMISSION
INSPECTION OBSERVATION REPORT**

Location: Airport/Other: Stage Coach PSC/TCP/TNC: 16585 Date: 4/24/25
(Circle one) Investigator: SLG

Prime Carrier: Avalon Transportation LLC Phone#: [REDACTED]
Address: _____ City: _____

Driver: [REDACTED]
Address: [REDACTED]
Phone: [REDACTED]

Relationship with Carrier: Owner/ Employee/ Sub-carrier/ Other: _____
(Circle one)

Comments: _____

License Plate #: [REDACTED] N II: _____ Registration Exp.: _____ Seats: _____

Registered Owner: Avalon Transportation Leased/Owned _____

Address: [REDACTED]
City: _____

Vehicle: ☐ TCP # Not shown on rear/front bumper
☒ Vehicle not listed with PUC ☐ No Trade Dress ☐ Front ☐ Rear
☐ PSC/TCP # not on side of vehicle* ☐ Carrier's name not on side of vehicle*
*Exempt for vehicles < 25 passengers incl. driver or leased < 30 days

Waybill: ☐ No waybill ☐ Carrier Name /TCP# ☐ Vehicle License Plate #
☐ Driver's Name ☐ Time/Date Charter arranged ☐ Origin/Destination
☐ No. of person in group ☐ Name/address of persons arranging charter
☐ Transportation arranged by phone or written contract
☐ Name of at least 1 passenger in traveling party or identification of traveling party's affiliation

TNC OPS: ☐ No Trade Dress ☐ Front ☐ Rear
☐ Profile Non-Match
☐ Lack Proof of Prearranged Ride
☐ Non-State CDL
☐ No Airport Permit

Violation(s): ☐ Yes, as noted above and in comments below ☐ No Violation

Law Enforcement Citation No.: _____

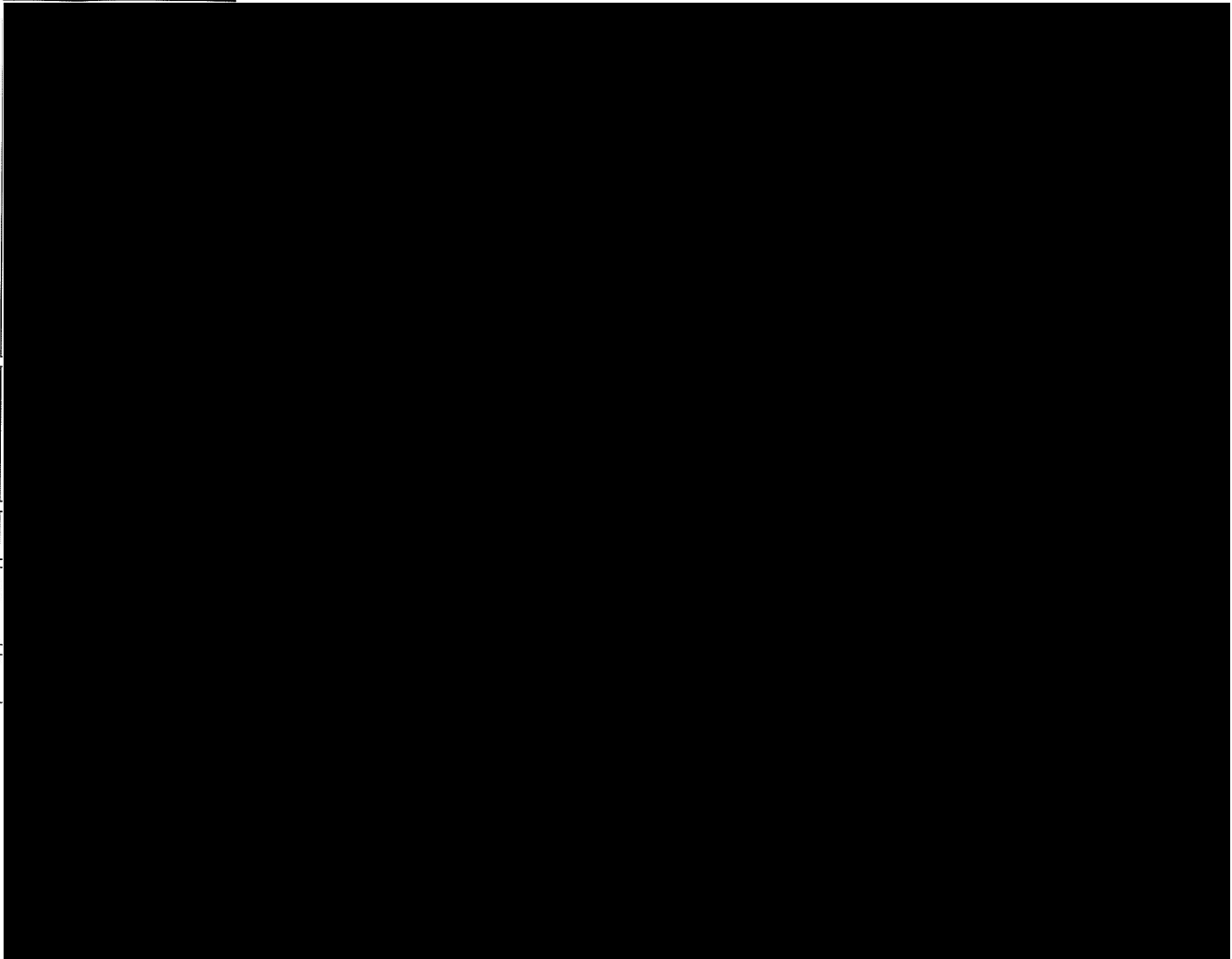
Comments: Vehicle license plate [REDACTED] is not
on carrier's equipment

Note: Failure to take corrective action may result in enforcement action including imposition of fines

Attachment 2

Work Ticket

Avalon Transportation, LLC



DEPARTURE

Location

Time On
Duty

Time Bus
Departed

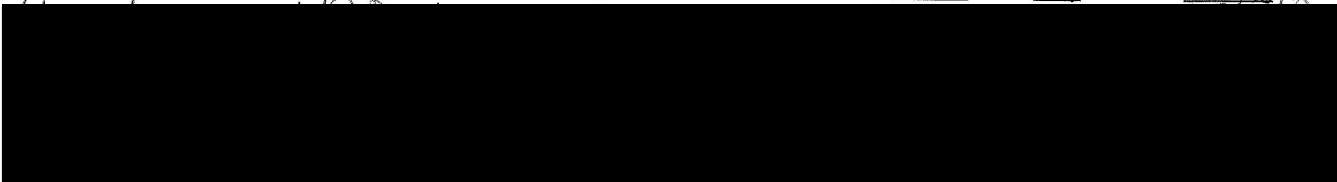
Location

ARRIVAL

Time Bus
Arrived

Time Off
Duty

Hub
Reading



Beginning Hub	_____	Finish Time	_____	State	_____	# Miles	_____	Advanced	_____
Total	_____	Total Hours	_____	State	_____	# Miles	_____	PerDiem	_____
		Spab Hours	_____	State	_____	# Miles	_____	#Chain-ups	_____

Customer Signature _____

Release Time: _____

Coach Operator Sign _____

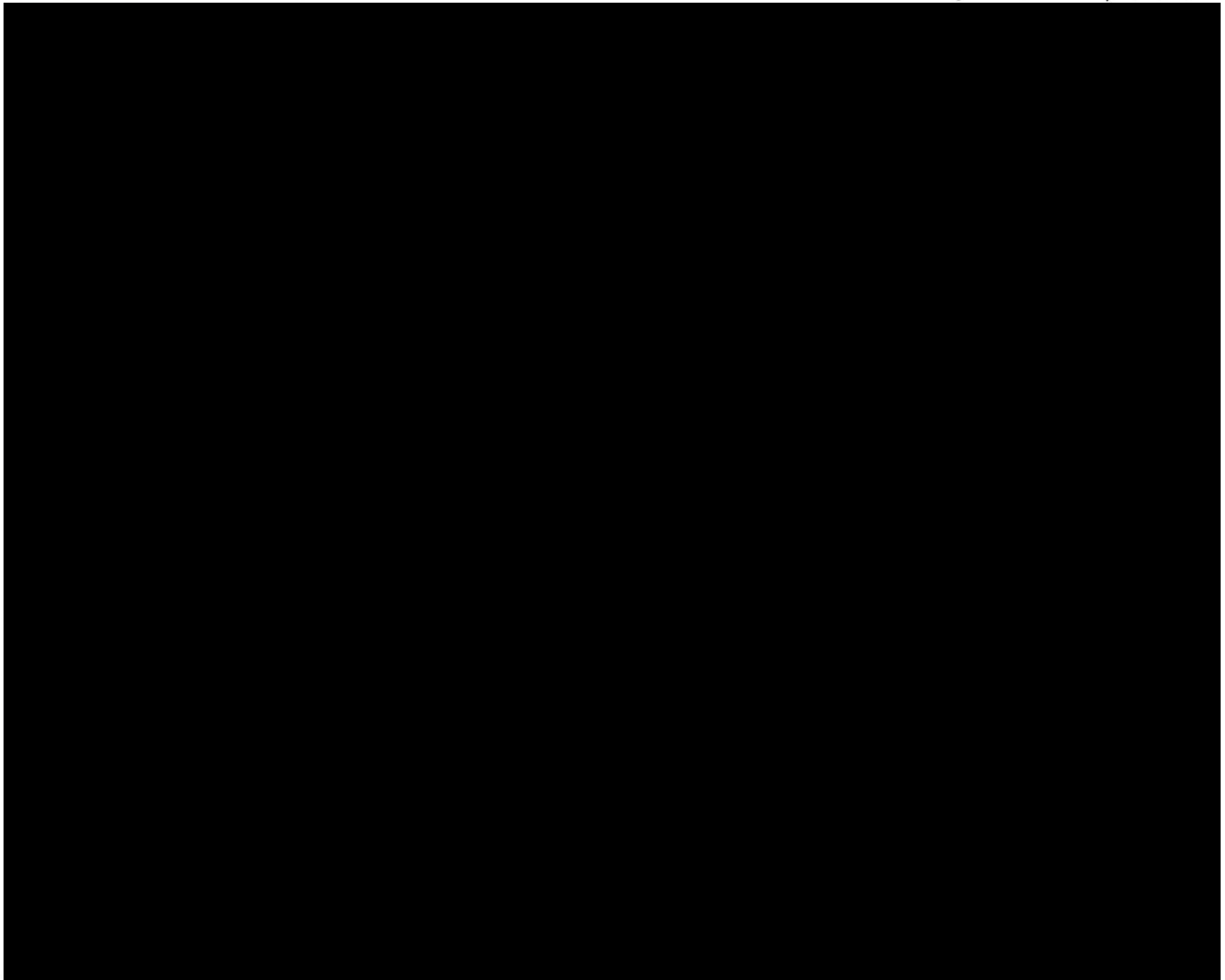
Dispatch Approval _____

Coach Manager Printed: _____

verify release time

Work Ticket

Avalon Transportation, LLC



DEPARTURE

ARRIVAL

Location

Time On
Duty

Time Bus
Departed

Location

Time Bus

Time Off

Hub



Coach Operator Signature

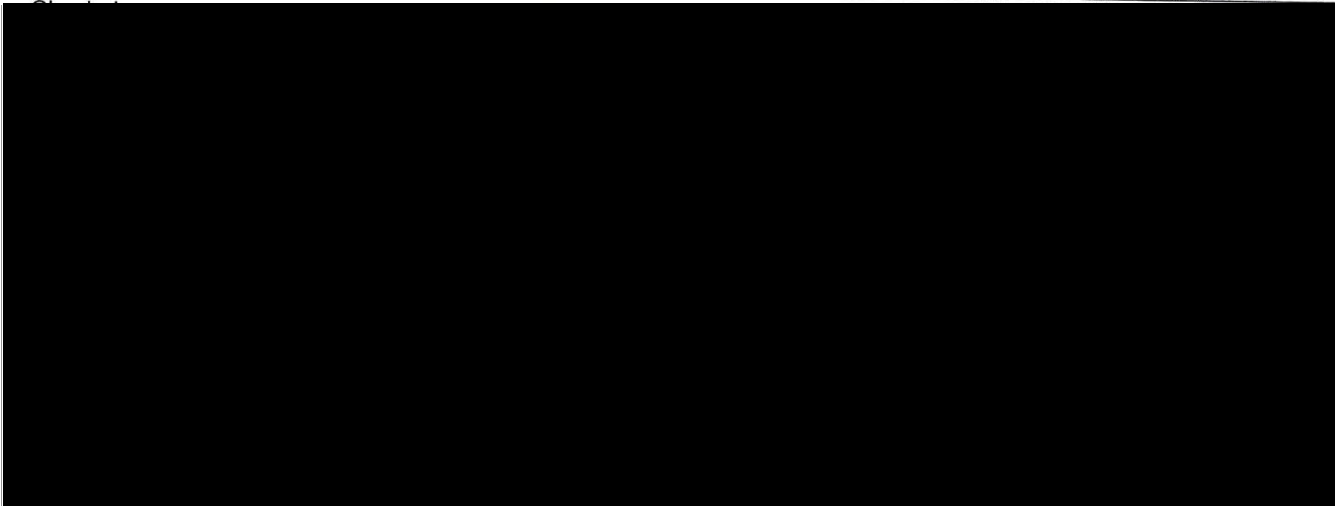
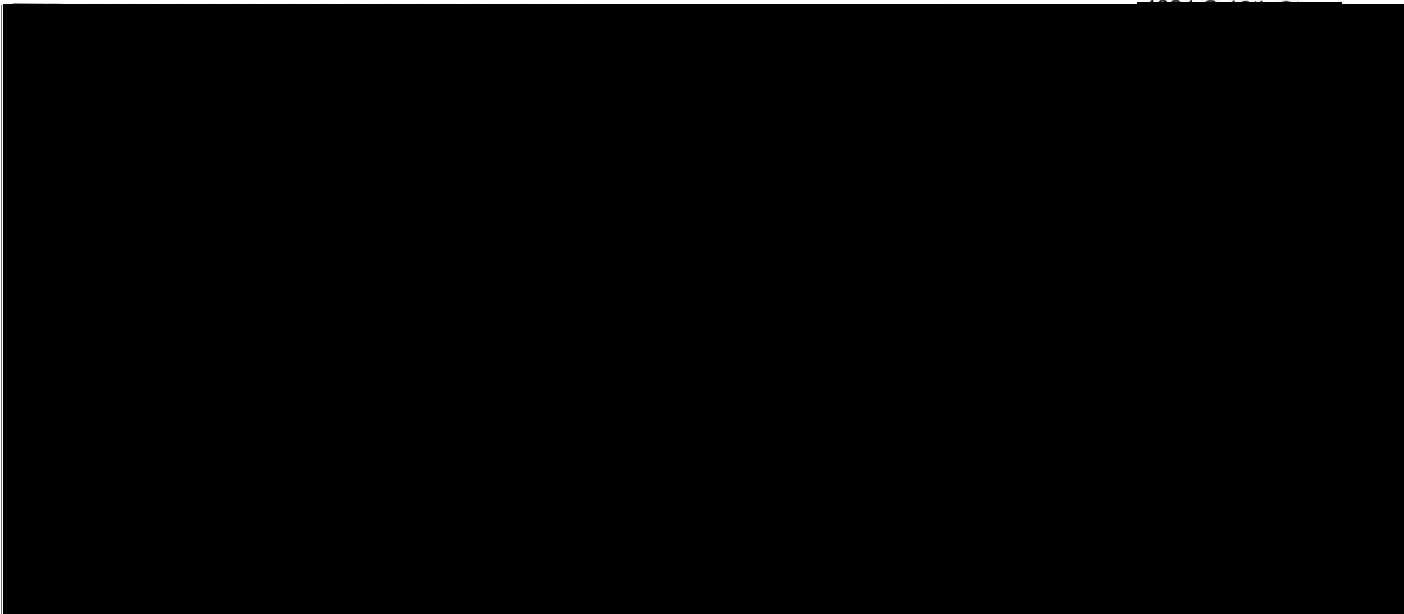
Coach Manager Printed: 4/23/202

Dispatch Approval

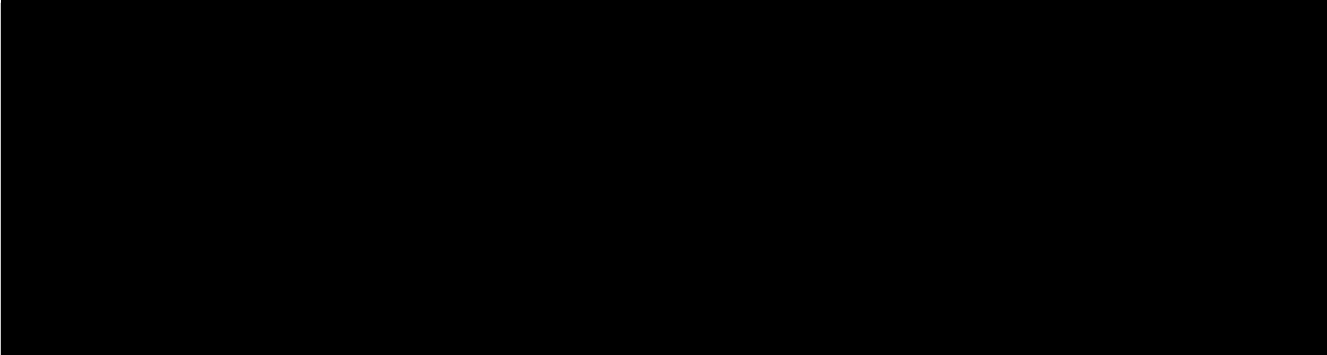
CUSTOMER SIGN to verify release time

Work Ticket

Avalon Transportation, LLC



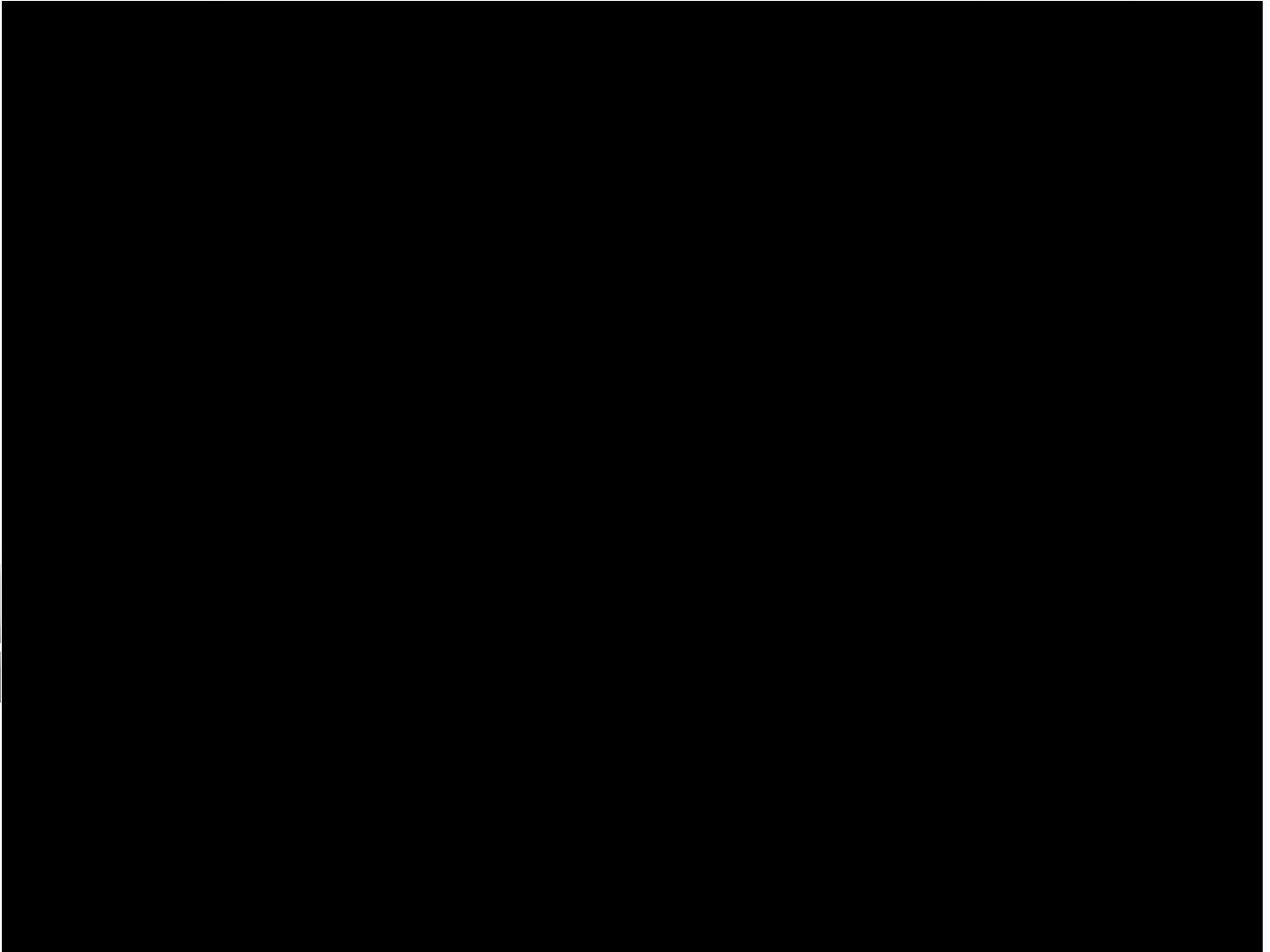
<u>Location</u>	<u>DEPARTURE</u>		<u>Location</u>	<u>ARRIVAL</u>		
	Time On	Time Bus		Time Bus	Time Off	Hub
	Duty	Departed		Arrived	Departed	



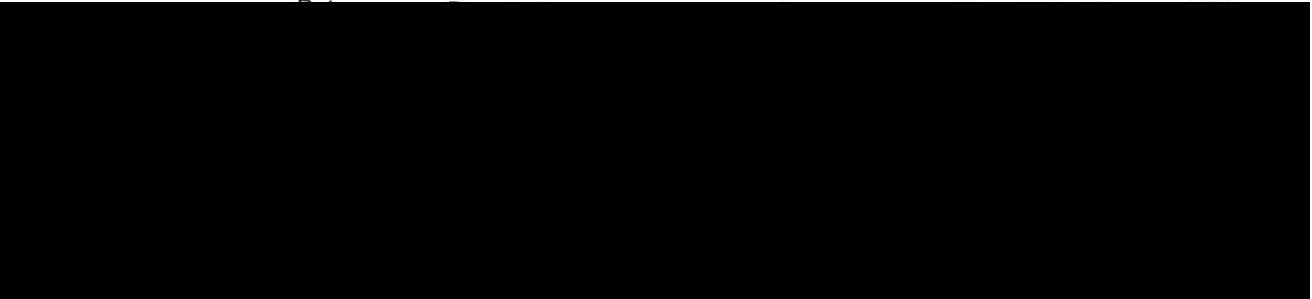
Coach Operator Signature _____ Dispatch Approval _____
Coach Manager Printed: 4/23/2025 6:58:38 AM Please have CUSTOMER SIGN to verify release time

Work Ticket

Avalon Transportation, LLC



<u>Location</u>	<u>DEPARTURE</u>		<u>Location</u>	<u>ARRIVAL</u>		
	Time On	Time Bus		Time Bus	Time Off	Hub



Customer Signature _____ Release Time: _____

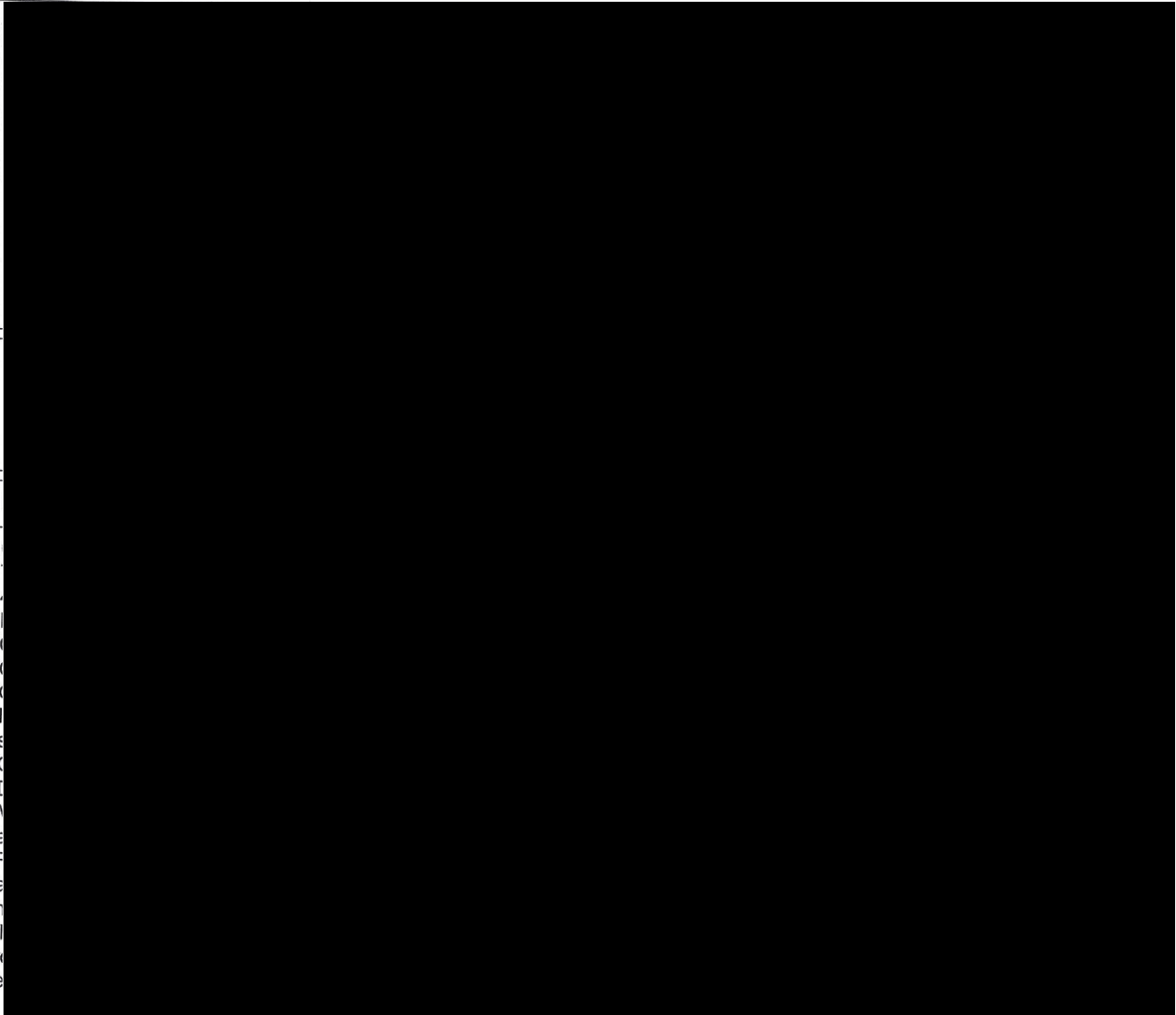
Coach Operator Signature _____ Dispatch Approval _____

Coach Manager Printed: 4/23/2025 6:59:40 AM

Please have CUSTOMER SIGN to verify release time

Work Ticket

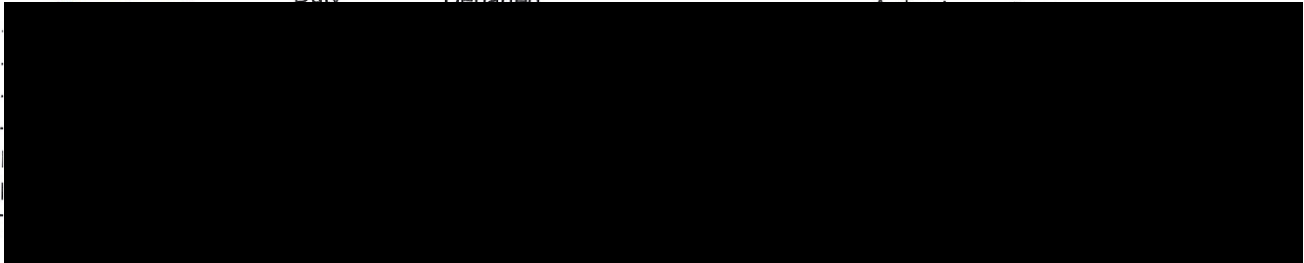
Avalon Transportation, LLC



DEPARTURE

ARRIVAL

<u>Location</u>	<u>Time On</u>	<u>Time Bus</u>	<u>Location</u>	<u>Time Bus</u>	<u>Time Off</u>	<u>Hub</u>
	<u>Duty</u>	<u>Departed</u>				



Spas Hours _____ State _____ # Miles _____ #Chain-ups _____

Customer Signature _____

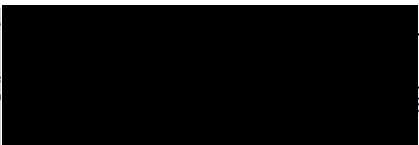
Release Time: _____

Coach Operator Signature _____

Dispatch Approval _____

Coach Manager Printed: 4/23/2025

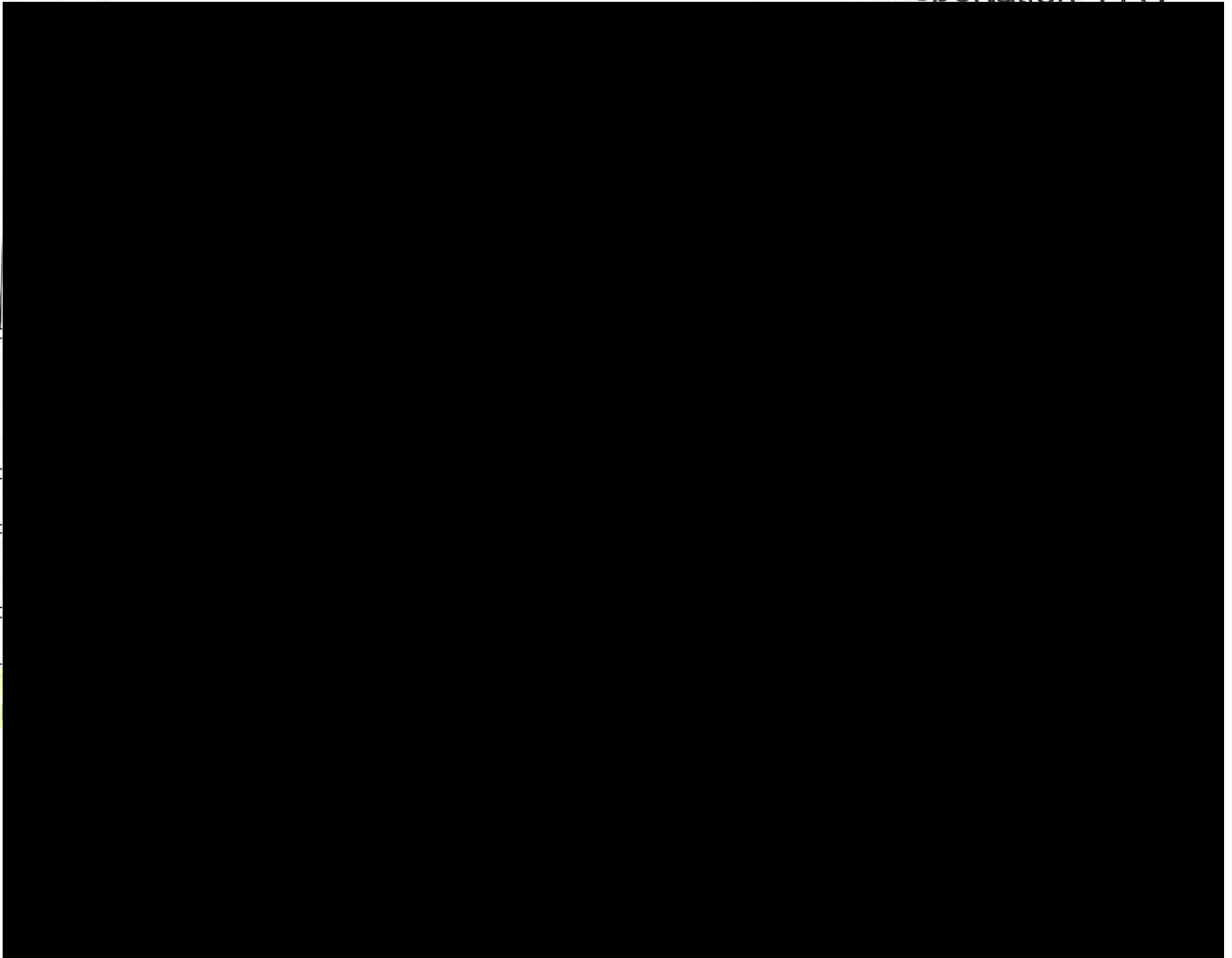
SIGN to verify release time



675283

Work Ticket

Avalon Transportation LLC



Location

DEPARTURE

Time On
Duty

Time Bus

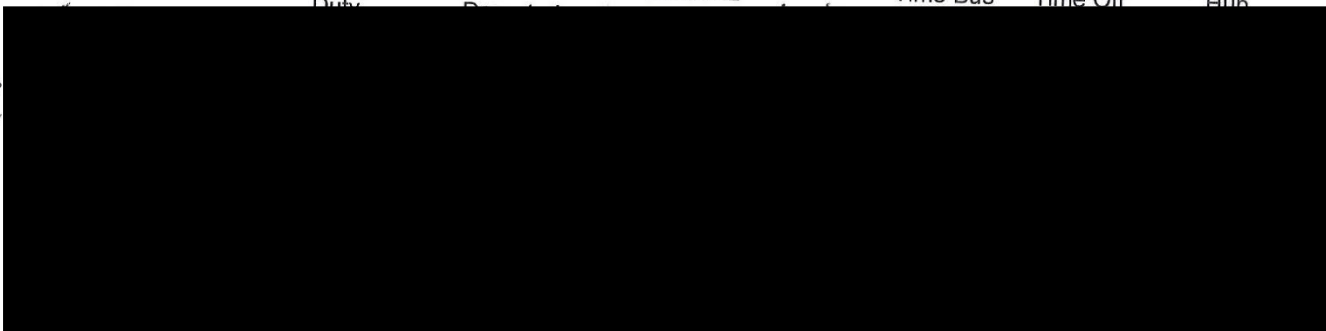
Location

ARRIVAL

Time Bus

Time Off

Hub



Coach Operator Signature

Coach Manager Printed: 4/23/2025

Release Time: _____

Dispatch Approval _____
to verify release time

Attachment 3

[Accounts \(/lightning/o/Account/home\)](#) > [AVALON TRANSPORTATION LLC \(/lightning/r/001t000000q86pBAAQ/view\)](#)

Active Equipment (Assets)

125 items • Sorted by License Plate • Filtered by Status • Updated a few seconds ago






	VIN Number	License Plate	Seats (Incl...)	Body Type	Terminal Address
1					
2					
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-  AVALON TRANSP...
-  PUCTRA F...
-  Assets (/li...
-  PSG00165...
-  **Assets (/l...**

Attachment 4

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[illegible]

[illegible]

[illegible]

[illegible]

[illegible]