



Public Utilities Commission  
STATE OF CALIFORNIA

CITATION FOR VIOLATION  
OF PUBLIC UTILITIES CODE

To: Alain De Lai  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

File: Unlicensed  
\_\_\_\_\_  
Date: June 26, 2026  
\_\_\_\_\_  
Citation #: T.2026-06-006  
\_\_\_\_\_  
Case #: CSE-996  
\_\_\_\_\_

VIOLATIONS

You are hereby cited with having violated section(s) of the Public Utilities Code (P.U. Code) and California Public Utilities Commission (CPUC) General Order (G.O.) as described below. This violation occurred on June 25, 2026.

- **Operated as a charter-party carrier without authority in violation of Pub. Util. Code Section 5371 [1 count].**

STATEMENT OF FACTS

The above violations are documented in the attached Investigation Report, which consists of 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 July 16, 2026. By way of such answer, you may either:

- (1) Pay a fine of \$1,500 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 July 16, 2026, 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.

*Shirley Lei*

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Shirley Lei, Program and Project Supervisor  
Consumer Protection and Enforcement Division  
Transportation Enforcement Branch  
Telephone number: (415) 722-1548  
E-mail address: Shirley.Lei@cpuc.ca.gov



Public Utilities Commission

STATE OF CALIFORNIA

CITATION COMPLIANCE AGREEMENT

File No.: Unlicensed

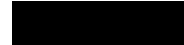
Citation #: T.2026-06-006

Date: June 26, 2026

Case #: CSE-996

I (we) hereby agree to comply with this citation dated June 26, 2026, and herewith pay the fine of \$1,500

Alain De Lai



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(Signature)

(Title)

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(Date)

**Licensed Carriers:**

Payment shall be submitted online via TCP Portal ([Welcome to TCP Portal \(ca.gov\)](http://www.cpr.ca.gov)) using a credit card or ACH.

Or

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

**INVESTIGATION REPORT**

**CARRIER:** Alain De Lai

**OWNER:** Alain De Lai

**AUTHORITY:** Unlicensed

**MAILING ADDRESS:** [REDACTED]

**PHONE/EMAIL:** [REDACTED] / [REDACTED]

**VEHICLES:** 1 (License Plate # [REDACTED], VIN [REDACTED])

**EMPLOYEE-DRIVERS:** N/A

**PL&PD INSURANCE:** N/A

**WORKERS' COMPENSATION INSURANCE:** N/A

**DRUG CONSORTIUM:** N/A

## INTRODUCTION

On June 26, 2026, I was assigned to investigate the operations and practices of Alain De Lai because Mr. Lai was observed soliciting a passenger for a trip from Santa Clara to San Francisco. This incident occurred during a joint operation with the California Highway Patrol (CHP) and the Santa Clara Police Department on June 25, 2026. Mr. Lai's vehicle, with license plate [REDACTED], was then subsequently impounded by CHP [**Attachment 1**].

## VIOLATION

The investigation of Alain De Lai found the following provisions of the Public Utilities (Pub. Util.) Code and a Commission General Order (GO):

- **Operated as a charter-party carrier without authority in violation of Pub. Util. Code Section 5371 [1 count]**

On June 25, 2026, CHP Officer Tam observed Alain De Lai illegally soliciting passengers. Officer Tam approached and interviewed the passenger, John Measher, and discovered that Mr. Lai was charging \$150 to take Mr. Measher from Santa Clara to the Richmond District in San Francisco. I interviewed Mr. Lai, and he confirmed he was not working for Uber or Lyft. Additionally, I confirmed with the Transportation Licensing and Analysis Branch's (TLAB) database that Mr. Lai has never held any operating authority from the Commission.

Mr. Lai operated a passenger vehicle for compensation without CPUC authority, in violation of California Pub. Util. Code §5371, which requires any charter-party carrier of passengers, including TNC drivers, to obtain a CPUC certificate or permit before operating for compensation. As a result, I served an Observation Report and Cease-and-Desist [**Attachment 2**] to Mr. Lai for operating without authority. Subsequently, I submitted the Request to Impound Form (CHP 180) to CHP Officer Robinson (Badge #21499) to impound the vehicle. [**Attachment 3**].

## DECLARATION

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

Executed on June 26, 2026, in San Francisco, California

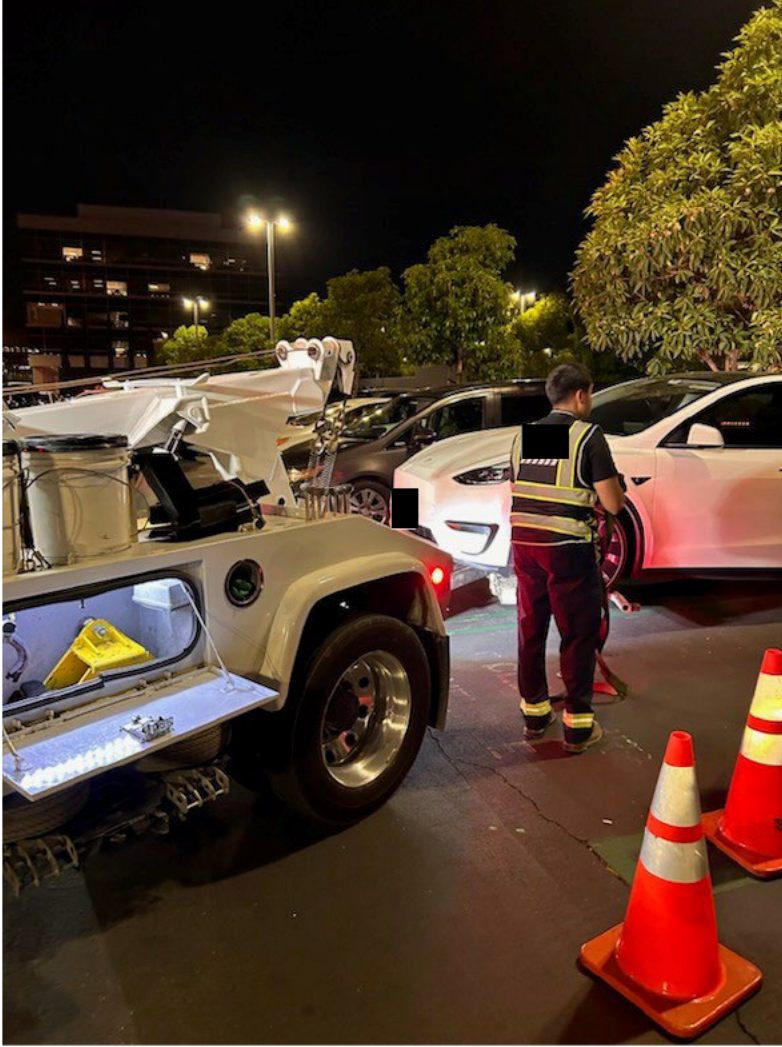
*Destiny Graham*  
Destiny Graham, PURA IV

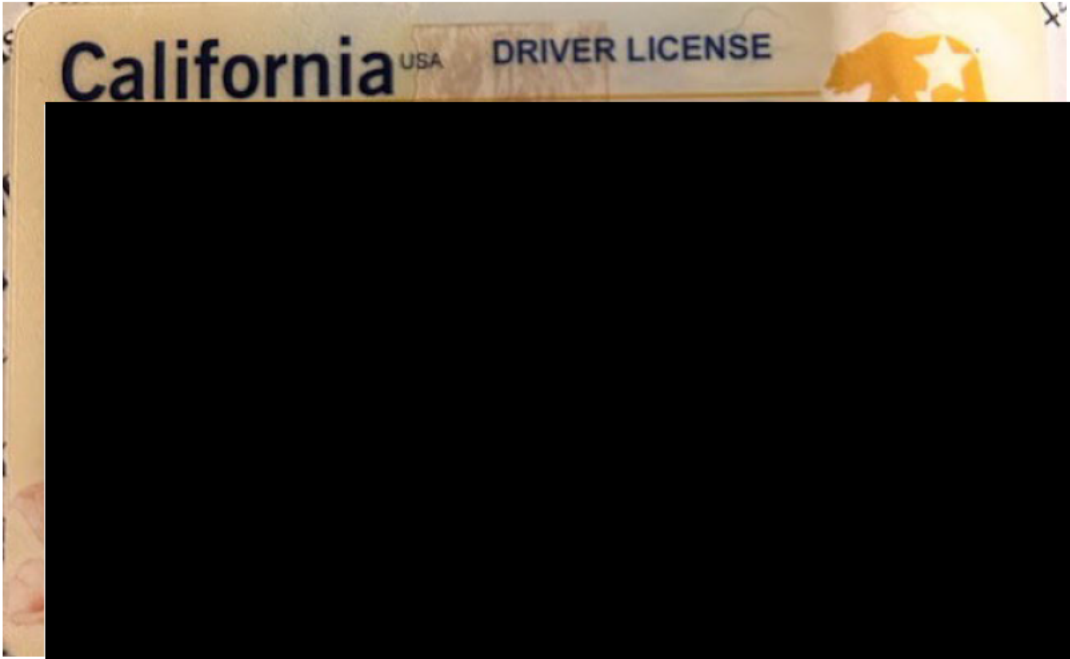
## **List of Attachments**

- **Attachment 1** – Images of Vehicle with LP [REDACTED] (Impounded)
- **Attachment 2** – Signed Inspection Observation Report and Cease-and-Desist
- **Attachment 3** – Request for Impound and CHP 180 Forms

# ATTACHMENT 1

Images of Vehicle with LP [REDACTED] (Impounded)





# ATTACHMENT 2

## Signed Inspection Observation Report and Cease-and-Desist

**CALIFORNIA PUBLIC UTILITIES COMMISSION  
INSPECTION OBSERVATION REPORT**

Date: 4/25/24  
Investigator: Amber Smith

Location: Airport/Other: LEVEL 500 PSC/TCP/TNC: --- Prime Carrier: \_\_\_\_\_ City: \_\_\_\_\_ Phone: \_\_\_\_\_  
(circle one)

Address: \_\_\_\_\_  
Driver: ALAN DE LA CDL#: \_\_\_\_\_ City: \_\_\_\_\_ Zip: \_\_\_\_\_  
Address: \_\_\_\_\_ City: \_\_\_\_\_ Zip: \_\_\_\_\_  
Phone: \_\_\_\_\_ Years w/company: \_\_\_\_\_ Prime Carrier: \_\_\_\_\_  
Relationship with Carrier: Owner/ Employee/ Sub-carrier/ Other: \_\_\_\_\_  
Comments: \_\_\_\_\_

License Plate #: \_\_\_\_\_ VIN #: \_\_\_\_\_ 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 abolition plate  
 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: passenger stated driver would give ride for \$50  
in San Francisco.



### NOTICE TO CEASE AND DESIST

Date: 1/25/24  
Carrier: ASAP DE LA  
TCP number, if any: \_\_\_\_\_ Operating Status: suspended

The California Public Utilities Commission (CPUC) has determined that you are operating without valid authority.

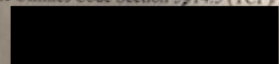
**YOUR COMPANY MUST IMMEDIATELY CEASE AND DESIST FROM ANY AND ALL OPERATIONS, INCLUDING ADVERTISING, UNTIL YOU MEET ALL LICENSING REQUIREMENTS AND RECEIVE VALID OPERATING AUTHORITY FROM THE CPUC. ANY OPERATIONS, INCLUDING ADVERTISING, WHILE OPERATING IN A SUSPENDED, CANCELLED, REVOKED, OR DENIED STATE IS UNLAWFUL.**

This letter places your company on notice that any activity without the required permit or certificate is a violation and may result in civil or criminal prosecutions, possible fines, and possible termination of telephone service. To acknowledge receipt of this notice, please call 800-894-9444 within 5 business days of receipt.

**OPERATION WITHOUT AUTHORITY**  
Public Utilities Code Sections 5371 and 5387,(TCP)Section 1031 (PSC).- Circle One

**OPERATION AFTER: SUSPENSION/REVOCATION/EXPIRATION/DENIAL OF AUTHORITY**  
Public Utilities Code Section 5379,(TCP)Section 1045,(PSC).- Circle One

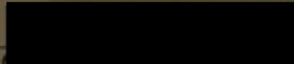
**ADVERTISEMENT WITHOUT AUTHORITY**  
Public Utilities Code Section 5414.5 (TCP) Section 1037 (PSC).- Circle One

Signature:  TITLE: OWNER

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

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

See attached Inspection Observation Report Form for more detail.

En   
Signature

# ATTACHMENT 3

## Request for Impound and CHP 180 Forms



Public Utilities Commission  
STATE OF CALIFORNIA  
**Request to Impound**

Indicate seating capacity of vehicle (including driver): 5

Indicate number of passengers (including driver): 2

One of the following is required:

- No TCP permit or certificate issued
- TCP/PSC: \_\_\_\_\_ (circle one) pending, suspended, revoked, expired, or denied.
- Driver does not possess a valid and current CDL for vehicle operated license class, endorsement, or required certificate

Name of CPUC Enforcement Analyst requesting impound: Destiny Graham

Charge one of the following:

- PU Code Sections 5411/1037 ref PU Code Sections 5371/1031 - Misdemeanor/Unlawful to operate without proper PUC operating authority.
- PU Code Sections 5411/1037 ref PU Code Sections 5379/1045 - Misdemeanor/Unlawful to operate with suspended, revoked, or expired authority.

In body of citation indicate: "Vehicle impounded per 14602.9 CVC."

Name of person, who within 2 DAYS, notified the legal owner of the impound by certified mail:

Destiny Graham

Citing/Arresting Officer Name: Officer Robinson (Badge #21499)

Allied Agency Case Number: 1567

Date: June 25, 2026

**Reason for stop and additional notes on back of this form.**

STATE OF CALIFORNIA  
DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

**VEHICLE REPORT**

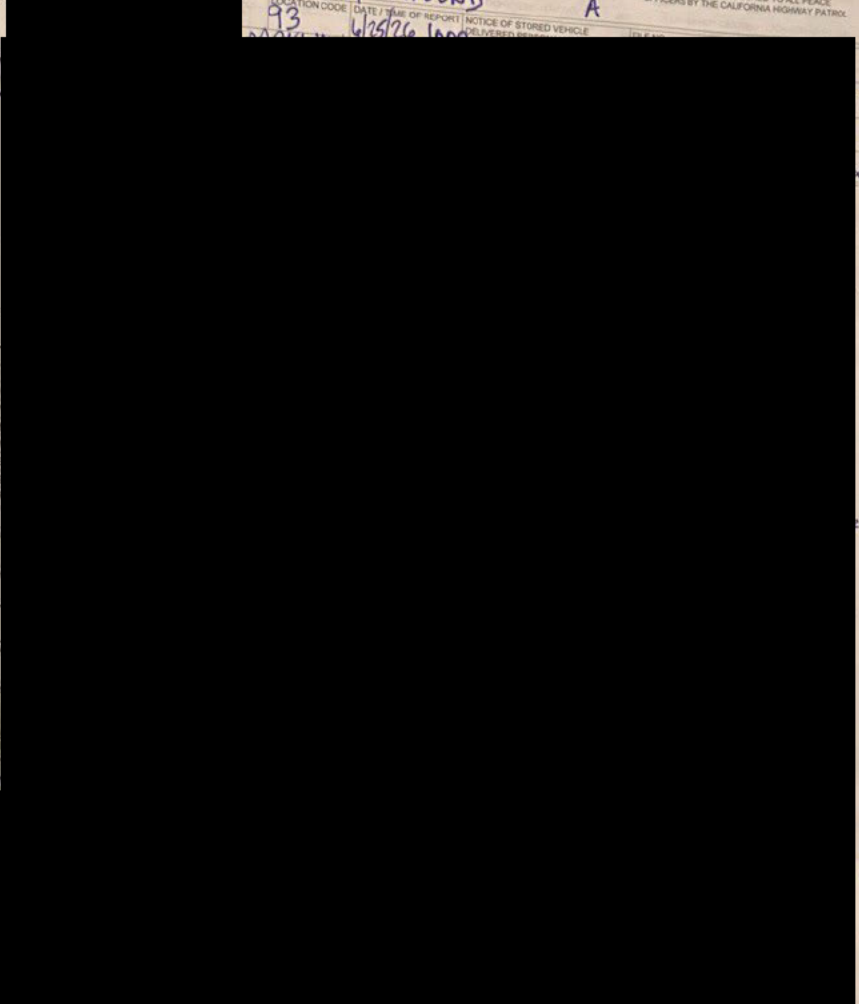
CHP 180 (Rev. 4-16) OPI 061

REPORTING DEPARTMENT  
CHP SA...

30 DAY IMPOUND

A

NOTE: CHP 180 IS FURNISHED TO ALL PEACE OFFICERS BY THE CALIFORNIA HIGHWAY PATROL.



FRONT LEFT SIDE RIGHT SIDE REAR  
SIGNATURE OF OFFICER TAKING REPORT: R. ROBINSON  
I.D. NO.: 21499  
SUPERVISOR  
REQUIRED NOTICES SENT TO REGISTERED AND LEGAL OWNERS PER 22852 CVCT: YES [ ] NO [ ]  
DATE NOTIFIED  
OSP 17 142796  
Chp180\_0416.pdf

An Internationally Accredited Agency