

**Public Utilities Commission** 

STATE OF CALIFORNIA

#### CITATION FOR VIOLATION OF PUBLIC UTILITIES CODE

To: ERO Transportation, Inc. Attention: Armine Manvelyan

File: TCP 39308 B Citation #: T.24-01-003 Date: January 12, 2024 Case #: PSG-5942

#### VIOLATIONS

You are hereby cited with having violated section(s) of the Public Utilities (Pub. Util.) Code and a Commission General Order (G.O.) as described below. These violations occurred during the period January 1, 2023, through August 8, 2023.

- Engaged 10 employee-drivers without evidence of Workers' Compensation (WKCP) insurance coverage in effect and on file with the Commission, in violation of Pub. Util. Code Section 5378.1 [1 count];
- (2) Failed to enroll 10 employee-drivers in the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) program, in violation of Pub. Util. Code Sections 5374(a)(1)(D), 5381, G.O. 157-E Part 5.02 [10 counts];
- (3) Failed to enroll 10 employee-drivers in the Controlled Substance and Alcohol Testing Certification Program for pre-employment testing, in violation of Pub. Util. Code Sections 5374(a)(1)(I) and 5381, and G.O. 157-E, Part 10 [10 counts];
- (4) Failure to maintain and produce records in violation of Pub. Util. Code Sections 5389, 5381, G.O. 157-E, Part 6.01 and G.O. 157-E, Part 6.02 [1 count].

#### **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**

You are hereby called upon to answer this citation on or before February 2, 2024. By way of such answer, you may either:

- Pay a fine of \$20,000 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 the 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 February 2, 2024, 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.

Fric 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

Attachments

TEB Enforcement Analyst: Aaron Pete

Case: PSG-5942

#### **INVESTIGATION REPORT**

CARRIER:	ERO Transportation, Inc.
<b>OFFICERS:</b>	Armine Manvelyan, CEO, CFO and Secretary, Pedro Consuelo, Director
AUTHORITY:	TCP 39308 B (Expired)
MAILING ADDRESS:	
PHONE/EMAIL:	(818) 402-5402; erotransportation@gmail.com
VEHICLES:	1
EMPLOYEE-DRIVERS:	1
PL&PD	New York Marine and General Insurance Company
<b>INSURANCE:</b>	Policy Number:
	Cancellation Date: July 16, 2023
WORKERS'	
COMPENSATION	
<b>INSURANCE:</b>	None
DRUG	
<b>CONSORTIUM:</b>	New Era Drug Testing
	Account No.

#### **INTRODUCTION**

On July 28, 2023, I was assigned to investigate the operations and practices of ERO Transportation, Inc., TCP 39308 B (hereinafter referred to as ERO) due to a Los Angeles International Airport Police Department ((LAXPD) complaint alleging that ERO was operating with a suspended authority and was involved in unfair business practices at LAX.

#### VIOLATIONS

I investigated ERO for the period of January 1, 2023, through August 8, 2023, and found violations of the following provisions of the Public Utilities (Pub. Util.) Code and the Commission General Order (G.O.):

### • Engaged 10 employee-drivers<sup>1</sup> without evidence of Workers' Compensation (WKCP) insurance coverage in effect and on file with the Commission, in violation of Pub. Util. Code Section 5378.1. [1 count]

Pub. Util. Code section 5378.1. states in part, "A statement under penalty of perjury, stating that, in its operations as a charter-party carrier, it does not employ any person in any manner so as to become subject to the workers' compensation laws of this state."

On July 28, 2023, Eric Hooks, Program Project Supervisor of the Transportation Enforcement Branch (TEB) sent a Data Request letter to Uber, via the California Public Utilities Commission's (CPUC) secured Kiteworks database, requesting waybills generated by ERO during the review period [Attachment 1]. Uber responded via Kiteworks, providing a

<sup>1</sup> On August 25, 2023, Uber responded to	data request and Uber provided a "Confidential
	was a spreadsheet (waybill log)
from Uber showing ERO had operated 144 days an	d conducted 136,219 trips with 475 different
employee-drivers operating. Due to the massive an	nount of data, a sample of 10 drivers, five from
January 1, 2023, and five from June 5-7, 2023, will	be used to substantiate the WKCP, DMV EPN and
Drug Program violations.	

spreadsheet showing ERO had 10 employee-drivers [Attachment 2 shows a sample of entries in a spreadsheet]. The Commission's Transportation Licensing and Analysis Branch (TLAB) records show that ERO has never had an active WKCP insurance policy in effect and on file with the Commission. ERO completed and signed a WCKP Declaration form and Driver Statement of Applicant form stating ERO has no employees and has only one driver [Attachment 3]. My investigation disclosed that ERO operated for 4 days and completed 78 trips without evidence of WKCP insurance [Table 1 and Attachment 2].

 Table 1 – Dates Driven without WKCP insurance, enrollment in DMV EPN Program, and in the Drug Consortium Program

Number of Drivers	Driver	Dates of Operation	Total Trips
1		1/1	7
2		1/1	7
3		1/1	7
4		1/1	4
5		1/1	6
6	Sec	6/6, 6/7	8
7		6/5, 6/6, 6/7	12
8		6/6, 6/7	9
9		6/6, 6/7	7
10		6/7	11
	Total	4 different days	78

• Failed to enroll 10 employee-drivers in the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) program, in violation of Pub. Util. Code Sections 5374(a)(1)(D), 5381, and G.O. 157-E Part 5.02 [10 counts]

A search of ERO's DMV EPN program with requester code shows ERO has been enrolled in the program since December 9, 2019. The program does not list the 10 employeedrivers listed in **Table 1 and Attachment 2** as being enrolled. My investigation disclosed that ERO operated with 10 employee-drivers for 4 days and completed 78 trips without being enrolled into ERO's DMV EPN program [**Table 1, Attachment 4, Footnote 1**]. • Failed to enroll 10 employee-drivers in the Controlled Substance and Alcohol Testing Certification Program for pre-employment testing, in violation of Pub. Util. Code 5374(a)(1)(I) and 5381, and G.O. 157-E, Part 10. [10 counts].

All charter-party carrier applicants who propose to employ any driver who will operate a vehicle having a seating capacity of 15 persons or less, including the driver, must provide for a mandatory controlled substance and alcohol testing certification program for those drivers as required by the G.O. unless all such drivers are already covered by federal testing regulations.

ERO's records show that it contracts with New Era Drug Testing LLC (hereinafter New Era). On December 4, 2023, a Data Request was sent to New Era requesting ERO's drivers' enrollment information for the review period. On December 5, 2023, New Era responded to the Data Request. New Era stated that ERO enrolled into their program on July 16, 2020, and had their program terminated on July 6, 2023. New Era stated only Armine Manvelyan was enrolled in their program from July 17, 2020, through July 6, 2023. New Era verified that the 10 employee-drivers listed in **Table 1 and Attachment 2** have never enrolled in ERO's drug program. My investigation disclosed that ERO operated with 10 employee-drivers for 4 days and completed 78 trips without being enrolled into ERO's drug program [**Table 1, Attachment 5, Footnote 1**].

#### • Failed to maintain and produce records in violation of Pub. Util. Code sections 5389, 5381, G.O. 157-E, Part 6.01, and G.O. 157-E, part 6.02. [1 count]

On August 8, 2023, I emailed a Cease and Desist (C&D) Notice and Data Request to ERO's email address and associated email addresses according to its Salesforce account. Main Email address: <u>erotransportation@gmail.com</u>. Email addresses associated with the carrier: <u>ellaalaverdian@yahoo.com</u>; <u>iskubr@gmail.com</u>; <u>arsenpetrosian42@gmail.com</u>; jimmycruz@yahoo.com; <u>armikno@mail.ru</u>; <u>isolimo7979@gmail.com</u>. On August 9, 2023, via U.S. Mail, I sent a C&D Notice and Data Request to the ERO's mailing, business, and terminal address, according to its Salesforce Account. ERO Transportation, Inc. Attn: Armine Manvelyan, Ovsep Sarafyan, & Karolina Alaverdyan, [Attachment 6]. On August 23, 2023, I called ERO at phone number, (818) 402-5402 and spoke to Armine Manvelyan, CEO, CFO and Secretary of ERO. I advised Ms. Manvelyan that I sent a C&D Notice and Data Request via email and by U.S. Mail. Armine Manvelyan stated she did not receive the documents. I asked Ms. Manvelyan if the company's email address and mailing address stated on their Salesforce account were correct. Ms. Manvelyan stated that the email and mailing address were correct. I advised Ms. Manvelyan about the C&D Notice which states to stop operating due to ERO's authority being suspended. Ms. Manvelyan stated that ERO is not operating. I advised Ms. Manvelyan about the Data Request and the requirement for the company to send me its business records by the deadline of August 23, 2023. Ms. Manvelyan stated that she would try to find and review the Data Request that I sent ERO on August 8, 2023. Ms. Manvelyan stated she would call me back after reviewing the Data Request.

On August 31, 2023, I called ERO Transportation, Inc. at (818) 402-5402. I spoke with Armine Manvelyan, and she stated that ERO did not receive the documents I sent on August 8th by email and on August 9th by U.S. Mail. I advised Ms. Manvelyan that the email addresses and mailing address that were provided by ERO on its Salesforce Account were the email addresses and mailing address I used to send ERO its C&D and Data Request. I advised Ms. Manvelyan that no email or mail was returned to me. Ms. Manvelyan asked for my email address and asked me to respond to her email by resending ERO's C&D and Data Request. I received Ms. Manvelyan's email, which is the same email on ERO's Salesforce account, erotransportation@gmail.com. I resent the C&D and Data Request to Ms. Manvelyan. Ms. Manvelyan stated she received the C&D and Data Request and stated she never received them earlier [Attachment 7]. Ms. Manvelyan stated that she needed time to provide the business documents requested in the Data Request. Ms. Manvelyan stated that she would be leaving the country to have a medical procedure performed and would have her accountant work on the Data Request. I provided a final deadline of September 15, 2023. Ms. Manvelyan emailed me a copy of the Cancellation Request/Policy Release form from ERO's insurance company, a copy of an invoice and two past drug result tests from her drug consortium, and a copy of ERO'S vehicle registration. No other documentation was provided.

On September 18, 2023, I called ERO at (818) 402-5402 and left a message stating the deadline to respond to the Data Request and to submit ERO's business records was September

15, 2023. I stated that if ERO does not contact me as soon as possible, then I will move forward with issuing a citation to ERO.

On September 20, 2023, I emailed ERO using the email address, erotransportation@gmail.com. I reiterated in my email the deadline to submit ERO's business records was September 15, 2023. I stated that if ERO fails to respond then I will move forward with a citation [Attachment 8].

On September 25, 2023, I emailed ERO stating that I had not heard from Armine Manvelyan or any person representing ERO **[Attachment 9]**. I stated that ERO would be cited for failure to produce and maintain its company's business records. ERO's non-response shows it will not in good faith cooperate with the Commission's Data Request.

On July 28, 2023, a Data Request letter was sent by Eric Hooks, Program Project Supervisor of TEB to Uber asking to provide waybills generated by ERO during the review period [Attachment 1]. Uber responded and provided a waybill spreadsheet showing ERO had operated 144 days and conducted 136,219 trips [Attachment 2 shows a sample of entries in the spreadsheet, Footnote 1]. My investigation disclosed that ERO failed to maintain and produce its records by not providing any of its waybills, income tax returns, or other business records to reconcile the information provided by Uber.

#### 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 January 12, 2024, at San Francisco, California.

Aaron Pete

Aaron Pete, Enforcement Analyst

# TABLE OF ATTACHMENTS

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- Attachment 1. Uber Data Request 7-28-23 and Uber Response 8-25-23
- Attachment 2. ERO 10 Employee-Drivers Sample
- Attachment 3. WKCP Declaration & Driver Statement Forms
- Attachment 4. ERO'S DMV EPN\_
- Attachment 5. Response to Data Request from New Era re. ERO
- Attachment 6. CD, Data Request and Salesforce Info. ERO Transportation
- Attachment 7. Resent CD & Data Request by email to ERO 8-31-23
- Attachment 8. Email ERO 9-20-23
- Attachment 9. Email ERO 9-25-23

# **ATTACHMENT 1**

STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION 505 Van Ness Ave. San Francisco, CA 94102



#### VIA ELECTRONIC MAIL ONLY

July 28, 2023

Uber Technologies, Inc. **TCP: 38150-A** 1515 3<sup>rd</sup> Street San Francisco, CA 94158 Email: Lee, Jane <u><jylee@uber.com</u>>

Data Request: (Uber Black platform/allegations of fraudulent passenger-carrier activity taking place on or around the Los Angeles International Airport (LAX)

Due Date: August 11, 2023

To Uber Technologies, Inc.:

The California Public Utilities Commission's (CPUC) Consumer Protection and Enforcement Division (CPED) seeks the information listed in the attached data request, pursuant to CPUC authority under Public Utilities Code §§ 311, 314, 581, 582, 584 and 5389.

Please submit the requested information on or before Friday, August 11, 2023, to:

Eric Hooks California Public Utilities Commission Consumer Protection and Enforcement Division Email: <u>eric.hooks@cpuc.ca.gov</u> Phone: (415) 703-2302

With a copy to:

Kenneth Bruno California Public Utilities Commission Consumer Protection and Enforcement Division Email: <u>kenneth.bruno@cpuc.ca.gov</u> If for any reason, Uber Technologies, Inc. (Uber) is unable to complete the data response by this date, please provide a written explanation to me as soon as possible, and no later than 5:00 pm on Friday, **August 4, 2023**, as to why Uber cannot meet the response date and when the information will be provided.

If a request, definition, or instruction is unclear then please notify me as soon as possible. Please answer the request in full and specify the reason if Uber is unable to respond to any portion of the Data Request.

Thank you for your cooperation.

Sincerely,

Fic Hooks for

Kenneth Bruno, Chief California Public Utilities Commission Consumer Protection and Enforcement Division Transportation Enforcement Branch <u>kenneth.bruno@cpuc.ca.gov</u> 213-220-5980

#### **DEFINITIONS AND INSTRUCTIONS**

You are instructed to answer the following Data Requests with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. For any questions, email the contact above.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify CPED as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided in the original electronic format, if available, and in an easily accessed digital copy using Word, Excel, PDF, etc. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning.

If a request, definition, or an instruction, is unclear, notify CPED as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

#### DATA REQUEST

The following Data Request relates to allegations of fraudulent passenger-carrier activity taking place on the Uber Black platform and around the Los Angeles International Airport (LAX), which TEB put Uber on notice of on April 27, 2023, and was the subject of the July 12, 2023 meeting between Uber and CPED/TEB representatives.<sup>1</sup>

- 1. Provide a narrative explanation summarizing the alleged fraudulent activity investigated by Uber.
- 2. Please provide any and all documents related to Uber's internal investigation into the allegations of fraudulent activities.
  - a. Include all fraudulent information and documents submitted to Uber (e.g., registrations, Charter-party carrier (TCP) permits and/or certificates, insurance documents, drivers' licenses, etc.) discovered by Uber as part of its investigation.
- 3. Provide the names of all individuals at Uber responsible for carrying out the investigation, including management responsible for oversight of the investigation.
- 4. If this matter was referred to or investigated by any other state or federal agency, please identify the agency, proceeding number, and contact information for the agency.
- 5. Please provide an Excel spreadsheet identifying the name of each Uber <u>employee</u> involved, the specific allegation(s) against each employee (including whether the employee violated Uber policies, Commission, or other legal authorities), the time frame of the allegations, any actions taken in response by Uber, and the date the action was taken with respect to each employee.
- 6. Please provide an Excel spreadsheet identifying the <u>passenger-carriers</u> involved in the fraudulent activities, including the following information: individual carrier names, owner names, doing business as names, actions taken by Uber with respect to the carrier, and date the actions were taken, and expected completion date of the action.
- 7. Please provide the names of each <u>passenger-carrier (carrier) involved</u> in the fraudulent activities at LAX, and provide copies of corresponding waybills from the initial date of fraudulent activity to current. Responsive waybills shall include, at a minimum, records from January 1, 2022 to current. In lieu of actual waybills, Uber may provide a spreadsheet including all waybill information per Commission General Order 157-E Part 3.01.

<sup>&</sup>lt;sup>1</sup> On April 27, 2023, Mr. Kenneth Bruno spoke with Uber's Jane Lee to alert Uber of an anonymous tip regarding fraudulent activity on the Uber Black platform on or near the LAX area. On July 12, 2023, Jane Lee and other Uber representatives met with Messrs. Kenneth Bruno, Eric Hooks, Raymond Momoh and Ms. Maria C. Solis to discuss Uber's actions in investigating this matter.

- 8. Provide any sub-carrier agreements between Uber and the sub-carrier for those carriers involved in the fraudulent activity per Commission General Order 157-E Part 3.04. If a subcarrier employed or contracted with affiliates, please identify all affiliates connected to each subcarrier and their associated drivers, and provide the subcarrier agreement between the subcarrier and its affiliates.
- 9. Please provide all new or existing internal and external control measures, policies or procedures that have been implemented to prevent or deter future fraudulent <u>employee</u> activity.
- 10. Please provide all new or existing internal and external control measures, policies, procedures that have been implemented to prevent or deter future fraudulent <u>subcarrier</u> activity.

#### **END OF REQUEST**

#### Uber Data Request, Issued July 28, 2023 Re: Uber Black Fraudulent Passenger-Carrier Activity Around LAX

**Question 1**: Provide a narrative explanation summarizing the alleged fraudulent activity investigated by Uber.

- Summarized the alleged violations around LAX.
  - LAX Police Department shared a driver's allegations:
    - Vehicles operating without commercial license plates.
    - Uber Black drivers skipping TCP queues.
    - Vehicles that should be deactivated are operating.
    - Fake Uber Black accounts.

**Question 2**: Please provide any and all documents related to Uber's internal investigation into the allegations of fraudulent activities.

- a) Include all fraudulent information and documents submitted to Uber (e.g., registrations, Charter-party carrier (TCP) permits and/or certificates, insurance documents, drivers' licenses, etc.) discovered by Uber as part of its investigation.
  - Copy of LAX PD complaint
  - Fleet documents (pictures of vehicle registrations)

**Question 3**: Provide the names of all individuals at Uber responsible for carrying out the investigation, including management responsible for oversight of the investigation.

• Provided 12 names.

**Question 4**: If this matter was referred to or investigated by any other state or federal agency, please identify the agency, proceeding number, and contact information for the agency.

- Uber has referred the issue to the FBI.
   <u>Special Agent Mark Newhouse</u>, FBI Los Angeles Field Office,
- The U.S. Department of Justice has opened a grand jury investigation.

**Question 5**: Please provide an Excel spreadsheet identifying the name of each Uber employee involved, the specific allegation(s) against each employee (including whether the employee violated Uber policies, Commission, or other legal authorities), the time frame of the allegations, any actions taken in response by Uber, and the date the action was taken with respect to each employee.

- Uber identified three employees and two third-party contractors. The employees are no longer employed, and the contractors' assignments were terminated.
- Uber provided the names of the employees and contractors.

**Question 6**: Please provide an Excel spreadsheet identifying the passenger-carriers involved in the fraudulent activities, including the following information: individual carrier names, owner names, doing business as names, actions taken by Uber with respect to the carrier, and date the actions were taken, and expected completion date of the action.

• Uber has provided a spreadsheet with the information. Uber identified 43 carriers. A driver was deactivated from one carrier while the other carriers' fleets have been deactivated.

**Question 7**: Please provide the names of each passenger-carrier (carrier) involved in the fraudulent activities at LAX and provide copies of corresponding waybills from the initial date of fraudulent activity to current. Responsive waybills shall include, at a minimum, records from January 1, 2022, to current. In lieu of actual waybills, Uber may provide a spreadsheet including all waybill information per Commission General Order 157-E Part 3.01.

- Subcarrier referenced in the LAX PD complaint and determined to have submitted fraudulent documents to Uber:
  - ERO Transportation Inc. (PSG 0039308)
  - AMR77 Corporation (PSG 0038984)
  - VIP77 Transportation Services Inc. (PSG 0041087)
  - Tikero Group Inc. (PSG 0039467)
  - Picazo Limo LLC (PSG 0040668)
- Uber provides waybill information for the subcarriers listed above.

**Question 8**: Provide any sub-carrier agreements between Uber and the sub-carrier for those carriers involved in the fraudulent activity per Commission General Order 157-E Part 3.04. If a subcarrier employed or contracted with affiliates, please identify all affiliates connected to each subcarrier and their associated drivers, and provide the subcarrier agreement between the subcarrier and its affiliates.

- Provided a copy of the most current subcarrier agreement ("Platform Access Agreement") between Uber and the subcarriers involved in the fraudulent activity.
- Uber is not aware of whether subcarriers contracted with affiliates.

**Question 9**: Please provide all new or existing internal and external control measures, policies or procedures that have been implemented to prevent or deter future fraudulent employee activity.

- Members of the Community Operations team undergo specific training related to fraud and document approvals.
- Uber restricts access to fleet partner accounts so that only select employees can approve documents submitted and take certain account actions.
- Greenlight Hub agents are no longer permitted to approve certain fleet level documents in California.
- Uber provided copies of their employee training and policy documents (17 documents).

**Question 10**: Please provide all new or existing internal and external control measures, policies, procedures that have been implemented to prevent or deter future fraudulent subcarrier activity.

- Uber is working to improve processes to detect and prevent altered documents by subcarriers:
  - Updating document review processes to include a barcode scan and second-layer review of all vehicle registration documents.
  - Requiring agents perform a double entry of VIN and license plate information.
  - Implementing a specialized review by trained agents for insurance certificates.
  - Uber plans to implement a secondary fraud review process for identity documents utilizing fraud detection tools and specialized agents.
  - Updating document review guidance for agents.
  - Changing access controls on fleet partner accounts internally at Uber.
  - Tracking subcarriers who submitted altered documents to prevent the same TCP entity from re-onboarding.
  - Actively monitoring existing fleet activity to detect suspicious activity.

### Uber

David Case West Operations westregs@uber.com Uber Technologies, Inc. 1515 3rd Street San Francisco, CA 94158

August 25, 2023

#### Via Email

#### Eric Hooks

Consumer Protection and Enforcement Division California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102 eric.hooks@cpuc.ca.gov

Re: Uber Black fraudulent passenger-carrier activity around LAX

Dear Mr. Hooks:

In response to the second re: Uber Black fraudulent passenger-carrier activity around LAX issued on July 28, 2023 ("Data Request"), Uber Technologies, Inc. (TCP0038150-P) ("Uber") respectfully submits responsive information in

Should you have additional questions, please contact me at westregs@uber.com.

Respectfully submitted,

#### /s/David Case

Manager - Southwest Operations Uber Technologies, Inc.

# **ATTACHMENT 2**

no. of trips	name_of_carrier
1	ERO TRANSPORTATION
2	ERO TRANSPORTATION INC
3	ERO TRANSPORTATION INC
4	ERO TRANSPORTATION INC
5	ERO TRANSPORTATION
6	ERO TRANSPORTATION
7	ERO TRANSPORTATION INC
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41	ERO TRANSPORTATION INC

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1/1/23 12:04 AM			90210	9029
1/1/23 12:04 AM			90046	9004
1/1/23 12:06 AM			90403	90069
1/1/23 12:06 AM	1		90291	9029
1/1/23 12:07 AM	-		90069	9004
1/1/23 12:07 AM	1		90291	91604
1/1/23 12:09 AM			90046	9002
1/1/23 12:10 AM	9		91107	9160
1/1/23 12:11 AM	1		91362	9136
1/1/23 12:12 AM			90291	90230
1/1/23 12:13 AM	-		90210	9040
1/1/23 12:13 AM			90212	90069
1/1/23 12:17 AM			90028	9003
1/1/23 12:18 AM			90046	9021
1/1/23 12:20 AM	3		90265	9006
1/1/23 12:21 AM			90403	9103
1/1/23 12:21 AM			91423	90210
1/1/23 12:22 AM			90405	9004
1/1/23 12:26 AM	1		90069	90069
1/1/23 12:26 AM			90066	90024
1/1/23 12:27 AM	1		91205	9120
1/1/23 12:29 AM			90069	9004
1/1/23 12:30 AM			90039	9040
1/1/23 12:31 AM	1		91352	9142
1/1/23 12:32 AM	6		90048	9002
1/1/23 12:32 AM			90245	9026
1/1/23 12:33 AM	3		91362	9136
1/1/23 12:33 AM	9		91506	9007
1/1/23 12:34 AM	34		90291	9029
1/1/23 12:34 AM	3		90036	9002
1/1/23 12:35 AM	3		91403	9140
1/1/23 12:37 AM	10		90069	9006
1/1/23 12:38 AM			90069	9006
1/1/23 12:38 AM	3		90025	90034
1/1/23 12:39 AM			91423	9003
1/1/23 12:40 AM			91602	9160
1/1/23 12:40 AM			90024	9006
1/1/23 12:40 AM			90210	9021
1/1/23 12:43 AM	1		92688	92692
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# **ATTACHMENT 3**

#### PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA WORKERS' COMPENSATION DECLARATION FORM

This space for CPUC use only	YOUR FILE NUMBER PSG
	or
	MTR

When you fill out this form, remember that the term "employee" includes clerical persons as well as drivers and any other persons employed in your carrier operations.

If your business is an OUT OF STATE CORPORATION, please note that you are not subject to the workers' compensation laws of California unless you have employees who reside in California. If you have employees who reside in California, check "B" below; if not check "A".

If you employ persons in your carrier operations in any manner that makes you subject to the workers' compensation laws of California, have your insurance company submit proof of insurance via PUC Insurance **E-Filing** or a certificate of consent to self-insure issued by the Director of Industrial Relations.

Check one of the following (read both before choosing):

- A. XX I DO NOT HAVE ANY EMPLOYEES. If I hire employees in the future, I will submit an amended Workers' compensation Declaration Form to the Commission and contact my insurance company at once and have the required certificate of coverage mailed to the Commission. <u>NOTE TO HOUSEHOLD GOODS</u> <u>APPLICANTS</u>: If you check this box, you must attach a written explanation of how you will conduct operations without employees.
- B. I DO have employees. (This box also applies to applicants for a permit or certificate who do not now have employees, but will employ workers upon commencement of operations.) I will contact my insurance company and have the required certificate of coverage mailed to the Commission. I understand that the Commission will not issue or reinstate a permit or certificate until it receives my certificate of coverage.

#### CERTIFICATION

I (we) certify (or declare), under penalty of perjury, that I (we) have read and understand the above requirement regarding workers' compensation and that I (we) am (are) able to and will comply with it. I (we) certify (or declare), under penalty of perjury, that the foregoing is true and correct.

05/05/2020 Date:

Signature of Applicant gnature of Corporate Officer PRESIDENT

Title of Corporate Officer

TL 706-K (Rev. 10/2017)

#### PUBLIC UTILITES COMMISSION OF THE STATE OF CALIFORNIA DRIVER STATEMENT OF APPLICANT

			TCP-
) TRANSPORTATION	INC		
):			
		01-1-	Zie Ooste
			Zip Code
Phone No.			
)	Street Address	Street Address City County REQUESTER COD	Street Address City County State REQUESTER CODE NUMBER:

APPLICANT PROPOSES TO EMPLOY THE FOLLOWING DRIVERS (INCLUDING APPLICANT IF APPLICABLE), PROVIDING EACH DRIVER IS ELIGIBLE FOR A DRIVING CERTIFICATE. THIS LIST MUST BE A COMPLETE LIST OF ALL DRIVERS EMPLOYED BY YOUR COMPANY.

			USE ONLY		
CALIFORNIA DRIVER LICENSE NO.	IVER DATE FULL NAME OF DRIVER % OF OWNERSHIP NSE NO. M/D/Y MEMBER / OFFICER	CLASS OF LICENSE	STATUS		
		ARMINE MANVELYAN	25	С	$\checkmark$

CONTINUE ON BACK IF NECESSARY

Date:

05/05/2020

If applicant is a corporation:

Signature of Applicant(s)

PRESIDENT

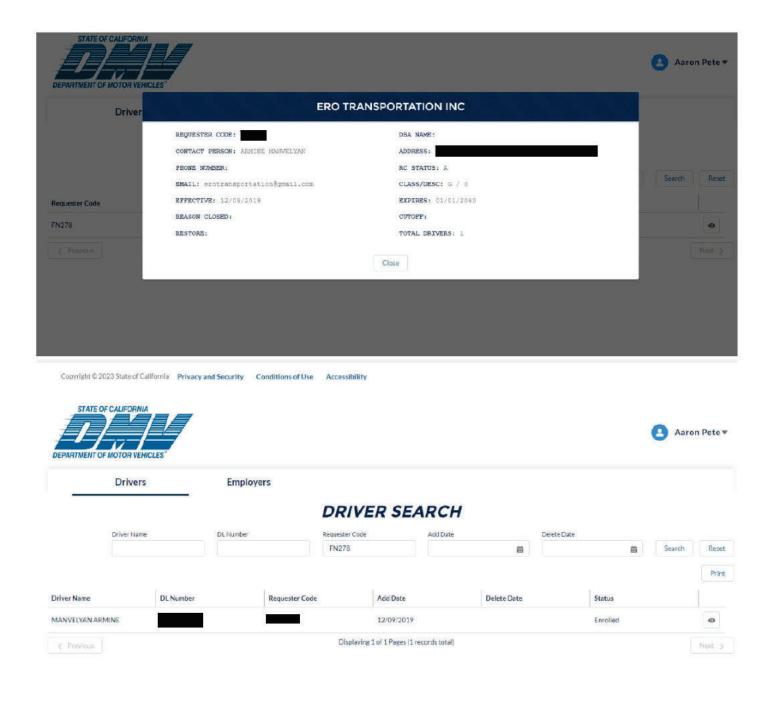
Title of Corporate Officer

201208

FOR CRUC

PL739-A (Rev. 2/17)

# **ATTACHMENT 4**



Copyright © 2023 State of California Privacy and Security Conditions of Use Accessibility

# **ATTACHMENT 5**

## Pete, Aaron

From:	NewEra Support <support@neweradrugtesting.com></support@neweradrugtesting.com>
Sent:	Tuesday, December 5, 2023 10:34 AM
То:	Pete, Aaron
Subject:	[EXTERNAL] RE: CPUC Data Request for Passenger Carrier Company: ERO Transportation, Inc., TCP 39308 B
Attachments:	Microsoft Word - Data Request to Drug Consortium PSG-5942-01pdf

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Aaron

I've attached the document with my notes highlighted in red. Please take a moment to review, and feel free to reach out if you have any questions.

Thank You, Anna Boyadzhyan Office Manager (800)801-0966 www.neweradrugtesting.com

×

I'd really appreciate you sharing a word or two about your positive experience with me, would you mind providing a quick review on Google for <u>New Era Drug Testing LLC</u>?

1. Simply click here <u>New Era Drug Testing LLC</u>

2. On the right side you'll see a "Write a review" option.

3. Give us your positive feedback!

×	5

------ Original Message -----From: Pete, Aaron [aaron.pete@cpuc.ca.gov]
Sent: 12/4/2023, 12:42 PM
To: info@neweradrugtesting.com
Subject: CPUC Data Request for Passenger Carrier Company: ERO Transportation, Inc., TCP 39308 B

Good afternoon, New Era Drug Testing,

Please find attached Data Request from the California Public Utilities Commission. If you have any questions or concerns, please contact me as soon as possible.

Sincerely,



×

 Aaron K. Pete, Public Utilities Regulatory Analyst II

 Transportation Enforcement Branch

 Consumer Protection and Enforcement Division

 California Public Utilities Commission

 **(415) 703-2347** 

 <u>aaron.pete@cpuc.ca.gov</u>

 <u>www.cpuc.ca.gov</u>

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

2

STATE OF CALIFORNIA

PUBLIC UTILITIES COMMISSION 505 Van Ness Avenue San Francisco, CA 94102

December 4, 2023

New Era Drug Testing Attn: Danny Yagubyan 801 S. Glenoaks Blvd., Suite 200 Burbank, CA 91502

Email: info@neweradrugtesting.com

Dear Danny Yagubyan:

### Re: Data Request No.

Data Request for Review period January 1, 2023, through August 8, 2023

Passenger Carrier Company: ERO Transportation, Inc., TCP 39308 B Attn: Armine Manvelyan

Due Date: December 8, 2023

The California Public Utilities Commission's (CPUC) Consumer Protection and Enforcement Division (CPED) requests the information listed on the attachment. If you have any questions, do not hesitate to contact me via email, aaron.pete@cpuc.ca.gov or telephone, (415) 703-2347. Please provide the information on or before December 8, 2023, to email to aaron.pete@cpuc.ca.gov

If for any reason, you are unable to respond to this data request by December 8, 2023, please provide a written explanation by 5:00 p.m. on December 6, 2023, explaining why you cannot meet the due date, and when you anticipate providing the requested information.



Gavin Newsom, Governor

Thank you for your cooperation.

Sincerely,

Aaron-Pete

Aaron Pete, Enforcement Analyst Consumer Protection and Enforcement Division Transportation Enforcement Branch Email: aaron.pete@cpuc.ca.gov Telephone: (415) 703-2347

cc: Eric Hooks, Program & Project Supervisor

Attachment

## DATA REQUEST NO.

## Data Request for Review period January 1, 2023, through August 8, 2023

- 1. The date ERO Transportation, Inc. was enrolled and the expiration date. Enrollment Date: 07/16/2020, Termination Date: 07/06/2023
- Status of the ERO Transportation, Inc.'s contract. Were they in compliance during the review period in question and what is their current status? Account is Currently terminated. No Random selection in 2023
- List of all drivers enrolled under this ERO Transportation, Inc.'s contract with your consortium; include dates drivers were added or deleted.
   Armine Manyelyan: Enrolled 07/17/2020, Terminated 07/06/2023
- 4. Were the drivers listed below enrolled in ERO Transportation, Inc.'s drug consortium program during the review period?



If the contract is no longer active, please state the reason(s).
 During the Consortium Renewal, Armine notified us that they are no longer in business.

# **ATTACHMENT 6**

## Pete, Aaron

From: Sent: To: Cc: Subject: Attachments:	Pete, Aaron Tuesday, August 8, 2023 4:45 PM erotransportation@gmail.com ellaalaverdian@yahoo.com; iskubr@gmail.com; arsenpetrosian42@gmail.com; jimmycruz@yahoo.com; armikno@mail.ru; isolimo7979@gmail.com Cease and Desist Notice and Data Request from the California Public Utilities Commission, Case No.: PSG-5942-ERO Transportation, Inc., TCP 39308 B - Suspended CD PSG-5942-ERO Transportation.pdf; Data Request PSG-5942-ERO Transportation.pdf
Importance:	High

To: Armine Manvelyan Ovsep Sarafyan Karolina Alaverdyan ERO Transportation, Inc.

Please find the attached Cease and Desist Notice and Data Request from the California Public Utilities Commission regarding your operations as charter-party carrier. A hard copy is being sent to your mailing address.

## Sincerely,



 Aaron K. Pete, Public Utilities Regulatory Analyst II

 Transportation Enforcement Branch

 Consumer Protection and Enforcement Division

 California Public Utilities Commission

 **(415)** 703-2347

 <u>aaron.pete@cpuc.ca.gov</u>

 ·
 ·
 <u>www.cpuc.ca.gov</u>

STATE OF CALIFORNIA

PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298 GAVIN NEWSOM, Governor



August 9, 2023

TCP 39308 B - SUSPENDED Case No.: PSG-5942

ERO Transportation, Inc. Attn: Armine Manvelyan, Ovsep Sarafyan, & Karolina Alaverdyan

Email: erotransportation@gmail.com

# NOTICE TO CEASE AND DESIST

Dear: ERO Transportation, Inc.,

On July 16, 2023, your charter-party carrier of passengers (TCP) operating authority was suspended for failure to maintain Public Liability and Property Damage (PL&PD) insurance and failure to pay quarterly fees (PUCTRA) Q1 2023.

This letter places you on notice to cease and desist immediately all advertisements and operations as a charter-party carrier of passengers without valid authority in force with the Commission. Continued violations may result in criminal prosecutions and termination of telephone service.

The Commission regulates and licenses charter-party carriers of passengers within California pursuant to the California Constitution. Public Utilities Code (P.U. Code) Sections 5411, 5414.5 and 5415 state that any carrier which operates and/or advertises without authority is guilty of a misdemeanor which is punishable by a minimum fine of \$1,000 or by imprisonment in the county jail for up to three months, or both. Each day of continued violations is a separate and distinct offense.

P.U. Code Section 5379 states that it is unlawful for any carrier to operate after suspension or revocation of its operating authority. This letter places your company on notice that continued violations of the law without the required authority may result in criminal prosecutions and possible termination of telephone service. There will be no further warnings.

Page 2

Please contact me within five days of receiving this notice at (415) 703-2347 or by email at aaron.pete@cpuc.ca.gov.

in rl,

Aaron Pete

Aaron Pete, Enforcement Analyst California Public Utilities Commission Consumer Protection and Enforcement Division Transportation Enforcement Branch Email: aaron.pete@cpuc.ca.gov Telephone: (415) 703-2347

Cc: Eric Hooks, Program and Project Supervisor

STATE OF CALIFORNIA

PUBLIC UTILITIES COMMISSION 505 Van Ness Avenue San Francisco, CA 94102 Gavin Newsom, Governor



August 9, 2023

# TCP 39308 B - SUSPENDED Case No.: PSG-5942

ERO Transportation, Inc. Attn: Armine Manvelyan, Ovsep Sarafyan, & Karolina Alaverdyan

Email: erotransportation@gmail.com

Subject: Data Request for Review period January 1, 2023, through August 8, 2023

Dear ERO Transportation, Inc.:

The California Public Utilities Commission's (Commission) Consumer Protection and Enforcement Division (CPED) Transportation Enforcement Branch (TEB) is currently reviewing the Commission's records for intrastate transportation carriers that are regulated by the Commission.

Public Utilities Code Section 5389 authorizes the Commission and its staff to have access at any time to the land, buildings, or equipment of a charter-party carrier of passengers used in connection with the operation of its business and may inspect the accounts, books, papers, and documents of the carrier.

General Order 157-E, Part 6.01 specifically states in part that every carrier shall institute and maintain in its offices a set of records which reflect information as to the transportation services performed, including waybills, driver records, and safety and maintenance records including copies of all lease and sub-carrier agreements. Such records shall be maintained for a minimum period of three years.

Pursuant to Public Utilities Code Section 5389, the Commission is requesting a review of the Charter-Party intrastate transportation records for ERO Transportation, Inc. Failure to provide access to records is a misdemeanor punishable by a maximum of \$5,000, or by imprisonment in a county jail not exceeding one year, or by both fine and imprisonment, where each violation is a separate and distinct offense (Public Utilities Code Section 2110).

We are requesting that you present your documents listed below in electronic form. Please scan the following documents and email a copy to Aaron Pete at aaron.pete@cpuc.ca.gov by August 23, 2023.

- 1. All waybills/trip logs for transportation performed from January 1, 2023, through August 8, 2023.
- 2. Department of Motor Vehicle (DMV) registrations and list of all equipment operated (owned, leased, or rented).
- 3. DMV Employer Pull Notice (EPN) records for drivers enrolled and/or deleted.
- 4. List of all drivers and their respective driver's license numbers, including dates hired and if still currently driving.
- 5. Your current Public Liability and Property Damage (PL&PD) insurance policy showing schedule of vehicles and drivers insured.
- 6. Your current Workers' Compensation (WKCP) insurance policy, if applicable.
- 7. List of all current sub-carriers and agreements.
- 8. Current service agreement with your Drug Consortium and a list of all drivers enrolled showing dates added and/or deleted.
- 9. Last three (3) years of filed Federal and State Income Tax Returns.
- 10. Bank statements and cancelled checks.
- 11. All other transportation records pertaining to ERO Transportation, Inc.'s operations which are not specifically noted above.

CPED reserves the right to amend, add to or revise this Data Request in the future if necessary.

Any responsive records provided by you that have been properly labeled and submitted as confidential will be treated as such under Public Utilities Code Section 583 (see also General Order 66-D). Confidential documents will not be released to the public except as required by law following a Public Records Request and redaction of confidential material.

If you have any questions, please do not hesitate to call me at (415) 703-2347 or e-mail aaron.pete@cpuc.ca.gov

Sincerely,

Aaron Poto.

Aaron Pete, Enforcement Analyst Consumer Protection and Enforcement Division Transportation Enforcement Branch Email: aaron.pete@cpuc.ca.gov Telephone: (415) 703-2347

cc: Eric Hooks, Program & Project Supervisor

#### 9/25/23, 4:56 PM

#### Contacts | Salesforce

#### 📰 ERO TRANSPORT... 📧 Contacts ... 🗸 🗙

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#### ERO TRANSPORTATION INC | Account | Salesforce

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AIF Effective Date 🚯	
Minimum Insurance 🚯	\$750,000.00
Minimum Insurance(Class C Authority)	\$0.00
Authority Codes	ТСР
CHP Status (3)	Inactive
Business City 🚯	
Business Country	
Phone	

Removed Date 🕚	
AIF Revoke Date 🚯	
Minimum Insurance(TNC)	\$0.00
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Business Name 🕕	
Business Street	
Business State 🕕	
Business Zip / Postal Code	0
DOT # 0	

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# **ATTACHMENT 7**

## Pete, Aaron

From:	Pete, Aaron
Sent:	Thursday, August 31, 2023 4:16 PM
То:	Amy Manvelyan
Subject:	RE: [EXTERNAL] Test
Attachments:	Data Request PSG-5942-ERO Transportation.pdf; CD PSG-5942-ERO Transportation.pdf

These documents were sent on August 9, 2023.

Sincerely,

Aaron K. Pete, Public Utilities Regulatory Analyst II Transportation Enforcement Branch Consumer Protection and Enforcement Division California Public Utilities Commission C (415) 703-2347 (aaron.pete@cpuc.ca.gov a www.cpuc.ca.gov

-----Original Message-----From: Amy Manvelyan <erotransportation@gmail.com> Sent: Thursday, August 31, 2023 4:14 PM To: Pete, Aaron <aaron.pete@cpuc.ca.gov> Subject: [EXTERNAL] Test

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sent from my iPhone

STATE OF CALIFORNIA

PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298 GAVIN NEWSOM, Governor



August 9, 2023

TCP 39308 B - SUSPENDED Case No.: PSG-5942

ERO Transportation, Inc. Attn: Armine Manvelyan, Ovsep Sarafyan, & Karolina Alaverdyan

Email: erotransportation@gmail.com

# NOTICE TO CEASE AND DESIST

Dear: ERO Transportation, Inc.,

On July 16, 2023, your charter-party carrier of passengers (TCP) operating authority was suspended for failure to maintain Public Liability and Property Damage (PL&PD) insurance and failure to pay quarterly fees (PUCTRA) Q1 2023.

This letter places you on notice to cease and desist immediately all advertisements and operations as a charter-party carrier of passengers without valid authority in force with the Commission. Continued violations may result in criminal prosecutions and termination of telephone service.

The Commission regulates and licenses charter-party carriers of passengers within California pursuant to the California Constitution. Public Utilities Code (P.U. Code) Sections 5411, 5414.5 and 5415 state that any carrier which operates and/or advertises without authority is guilty of a misdemeanor which is punishable by a minimum fine of \$1,000 or by imprisonment in the county jail for up to three months, or both. Each day of continued violations is a separate and distinct offense.

P.U. Code Section 5379 states that it is unlawful for any carrier to operate after suspension or revocation of its operating authority. This letter places your company on notice that continued violations of the law without the required authority may result in criminal prosecutions and possible termination of telephone service. There will be no further warnings.

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Please contact me within five days of receiving this notice at (415) 703-2347 or by email at aaron.pete@cpuc.ca.gov.

in rl,

Aaron Pete

Aaron Pete, Enforcement Analyst California Public Utilities Commission Consumer Protection and Enforcement Division Transportation Enforcement Branch Email: aaron.pete@cpuc.ca.gov Telephone: (415) 703-2347

Cc: Eric Hooks, Program and Project Supervisor

STATE OF CALIFORNIA

PUBLIC UTILITIES COMMISSION 505 Van Ness Avenue San Francisco, CA 94102 Gavin Newsom, Governor



August 9, 2023

# TCP 39308 B - SUSPENDED Case No.: PSG-5942

ERO Transportation, Inc. Attn: Armine Manvelyan, Ovsep Sarafyan, & Karolina Alaverdyan

Email: erotransportation@gmail.com

Subject: Data Request for Review period January 1, 2023, through August 8, 2023

Dear ERO Transportation, Inc.:

The California Public Utilities Commission's (Commission) Consumer Protection and Enforcement Division (CPED) Transportation Enforcement Branch (TEB) is currently reviewing the Commission's records for intrastate transportation carriers that are regulated by the Commission.

Public Utilities Code Section 5389 authorizes the Commission and its staff to have access at any time to the land, buildings, or equipment of a charter-party carrier of passengers used in connection with the operation of its business and may inspect the accounts, books, papers, and documents of the carrier.

General Order 157-E, Part 6.01 specifically states in part that every carrier shall institute and maintain in its offices a set of records which reflect information as to the transportation services performed, including waybills, driver records, and safety and maintenance records including copies of all lease and sub-carrier agreements. Such records shall be maintained for a minimum period of three years.

Pursuant to Public Utilities Code Section 5389, the Commission is requesting a review of the Charter-Party intrastate transportation records for ERO Transportation, Inc. Failure to provide access to records is a misdemeanor punishable by a maximum of \$5,000, or by imprisonment in a county jail not exceeding one year, or by both fine and imprisonment, where each violation is a separate and distinct offense (Public Utilities Code Section 2110).

We are requesting that you present your documents listed below in electronic form. Please scan the following documents and email a copy to Aaron Pete at aaron.pete@cpuc.ca.gov by August 23, 2023.

- 1. All waybills/trip logs for transportation performed from January 1, 2023, through August 8, 2023.
- 2. Department of Motor Vehicle (DMV) registrations and list of all equipment operated (owned, leased, or rented).
- 3. DMV Employer Pull Notice (EPN) records for drivers enrolled and/or deleted.
- 4. List of all drivers and their respective driver's license numbers, including dates hired and if still currently driving.
- 5. Your current Public Liability and Property Damage (PL&PD) insurance policy showing schedule of vehicles and drivers insured.
- 6. Your current Workers' Compensation (WKCP) insurance policy, if applicable.
- 7. List of all current sub-carriers and agreements.
- 8. Current service agreement with your Drug Consortium and a list of all drivers enrolled showing dates added and/or deleted.
- 9. Last three (3) years of filed Federal and State Income Tax Returns.
- 10. Bank statements and cancelled checks.
- 11. All other transportation records pertaining to ERO Transportation, Inc.'s operations which are not specifically noted above.

CPED reserves the right to amend, add to or revise this Data Request in the future if necessary.

Any responsive records provided by you that have been properly labeled and submitted as confidential will be treated as such under Public Utilities Code Section 583 (see also General Order 66-D). Confidential documents will not be released to the public except as required by law following a Public Records Request and redaction of confidential material.

If you have any questions, please do not hesitate to call me at (415) 703-2347 or e-mail aaron.pete@cpuc.ca.gov

Sincerely,

Aaron Poto.

Aaron Pete, Enforcement Analyst Consumer Protection and Enforcement Division Transportation Enforcement Branch Email: aaron.pete@cpuc.ca.gov Telephone: (415) 703-2347

cc: Eric Hooks, Program & Project Supervisor

# **ATTACHMENT 8**

## Pete, Aaron

From:	Pete, Aaron
Sent:	Wednesday, September 20, 2023 9:37 AM
To:	Amy Manvelyan
Subject:	RE: [EXTERNAL] Test
Importance:	High

Ms. Manvelyan,

I called and left a message on Monday, September 18, 2023. I stated in my message and will reiterate again.

The deadline to submit your company's business records was 9/15/23. I mainly need your company's waybills and income tax returns as soon as possible. If you fail to respond, then I will move forward by citing your company for failing to produce and maintain your company's business records. The citation fine will be around \$2,000 to \$3,000.

This is your final warning.

### Sincerely,



 Aaron K. Pete, Public Utilities Regulatory Analyst II

 Transportation Enforcement Branch

 Consumer Protection and Enforcement Division

 California Public Utilities Commission

 **(415) 703-2347** 

 <u>aaron.pete@cpuc.ca.gov</u>

 <u>\* www.cpuc.ca.gov</u>

# **ATTACHMENT 9**

# Pete, Aaron

From:	Pete, Aaron
Sent:	Monday, September 25, 2023 1:27 PM
То:	Amy Manvelyan
Subject:	RE: [EXTERNAL] Test

Ms. Manvelyan,

I have not heard from you or any person representing you company. The final deadline was September 15, 2023. Your company will be cited for failure to produce and maintain your company's business records. The following items are the minimum to satisfy the requirements to fulfill your obligation to the Commission's data request:

- 1. All waybills/trip logs for transportation performed from January 1, 2023, through August 8, 2023. None received.
- 2. List of all current sub-carriers and agreements. None received.
- 3. Current service agreement or contract with your Drug Consortium and a list of all drivers enrolled showing dates added and/or deleted. Received documents but none of the documents are valid contract between your company and the Drug Consortium.
- 4. Last three (3) years of filed Federal and State Income Tax Returns. None received.
- 5. Monthly Bank statements and cancelled checks for all of 2023. None received.

Your non-response shows you will not in good faith cooperate with the Commission's data request.

### Sincerely,



 Aaron K. Pete, Public Utilities Regulatory Analyst II

 Transportation Enforcement Branch

 Consumer Protection and Enforcement Division

 California Public Utilities Commission

 **a** (415) 703-2347
 <u>aaron.pete@cpuc.ca.gov</u>
 <u>www.cpuc.ca.gov</u>