

Public Utilities Commission

STATE OF CALIFORNIA

CITATION FOR VIOLATION OF PUBLIC UTILITIES CODE

To: ALES, LLC

Attention: Mansour Aleeshagh, CEO

File: TCP 39341 B Citation #: T.24-03-004 Date: March 26, 2024 Case #: PSG-5964

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.

- (1) Engaged 21 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) Failure to enroll 21 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 [21 counts];
- (3) Failure to enroll 21 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), 5381, and G.O. 157-E, Part 10 [21 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

You are hereby called upon to answer this citation on or before April 16, 2024. By way of such answer, you may either:

- (1) Pay a fine of \$7,000 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 April 16, 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.

Eric Hooks

Cric 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: TCP 39341 B Citation #: T.24-03-004 Date: March 26, 2024 Case #: PSG-5964

I (we) hereby agree to comply with this citation dated March 26, 2024 and herewith pay the fine of \$7,000.

·
(Title)

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 mail it to the above address.

INVESTIGATION REPORT

CARRIER: ALES, LLC

A California Limited Liability Company, 202003810328 (Active)

Case: PSG-5964

OFFICER: Mansour Aleeshagh, CEO

AUTHORITY: TCP 39341 B (Expired)

MAILING/PHYSICAL

ADDRESS:

PHONE/EMAIL:

VEHICLES: 3

EMPLOYEE-DRIVERS: 21

PL&PD New York Marine and General Insurance Company

INSURANCE: Policy Number:

Cancellation Date: July 28, 2023

WORKERS' None

COMPENSATION

INSURANCE:

DRUG Anzavista Drug & Alcohol Testing

CONSORTIUM:

INTRODUCTION

On October 6, 2023, I was assigned to investigate the operations and practices of ALES, LLC, TCP 39341 B (hereinafter referred to as ALES) due to a Los Angeles International Airport Police Department (LAXPD) complaint alleging that ALES was operating with a suspended authority and conducting improper business practices at LAX.

VIOLATIONS

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

• Engaged 21 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]

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 December 20, 2023, I sent a Data Request letter to Uber Technologies, Inc. (Uber), via the California Public Utilities Commission's (CPUC) secured email system, Kiteworks, requesting waybills generated by ALES during the review period [Attachment 1]. Uber responded via Kiteworks, providing a spreadsheet showing ALES had operated with 21 employee-drivers [Attachment 2¹]. The Commission's Transportation Licensing and Analysis Branch (TLAB) records show that ALES has never had an active WKCP insurance policy in effect and on file with the Commission. ALES completed and signed a WCKP Declaration form, and Driver Statement of Applicant form stating ALES has no employees and has only one driver-applicant. In addition, ALES's Secretary of State, LLC Registration – Articles of

¹ Due to the massive amount of data that Uber provided, Confidential Attachment Question aybills, Attachment only shows a sample of the times the 21 drivers operated without ALES having WKCP insurance, ALES not having enrolled their drivers in the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) program and not enrolled in a drug program.

Organization do not show any of the 21 employee-drivers as managers or members [Attachment 3]. My investigation disclosed that ALES operated for 183 days and completed 9455 trips without evidence of WKCP insurance [Table 1 and Attachment 2].

 $\begin{tabular}{ll} Table 1-Dates Driven without WKCP insurance, enrollment in DMV EPN Program, and the Drug Consortium Program \\ \end{tabular}$

Number of Drivers	Driver	Dates of Operation	Trips for Each Driver	Days Driven for Each Driver
1		1/1-1/10, 1/12-1/15, 1/19, 1/21, 1/22	54	17
2		1/1, 1/2, 1/8, 1/14, 1/22, 2/5, 2/12,	34	17
54		2/17, 2/20, 2/25, 2/26, 4/15, 5/8	292	46
3		1/1-1/3, 1/7-1/10, 1/14-1/30, 2/1-2/28,	2,2	10
		3/1-3/31, 4/1-4/2-4/18, 4/22-4/30, 5/1-		
		5/2, 5/4-5/10, 5/18-5/21, 5/23-5/31,		
		6/1-6/27	1258	156
4		1/1, 1/2, 1/8, 1/14, 1/22, 2/5, 2/12,	A. TO 150	3,00,00
VB		2/17, 2/20, 2/25, 2/26, 4/15, 5/8	28	13
5		5/29-5/31, 6/1-6/19, 6/22-6/27, 7/7-		1004500
		7/11	134	33
6		6/26,6/27	8	2
7		3/29-3/31, 4/1-4/18	102	21
8		1/2-1/15, 1/17-1/21, 1/23-1/28, 1/30,		
(THEODO)		1/31, 2/1-2/6, 2/8-2/13, 2/15, 2/17,		
		2/19, 2/21-2/24, 2/26, 3/23-3/31, 4/1-		
		4/17, 4/20-4/24, 4/26-4/30, 5/1-5/31,		
		6/1-6/18, 6/21-6/23	685	132
9		5/4-5/21, 5/25-5/29, 5/31, 6/1-6/5, 6/7-		
		6/11, 6/15-6/17, 6/19, 6/21, 6/22, 6/24-		
		6/27, 7/7-7/10	326	48
10	500 - 100 -	1/1-1/8	36	8
11		4/27-4/30, 5/1-5/9, 5/11-5/28, 5/30,	Section 1994	2000000
		5/31, 6/1-6/3, 6/5-6/9, 6/12-6/23	436	53
12	.,	1/1-1/16, 1/19-1/30, 2/1-2/11, 2/13-		
		2/28, 3/1-3/31, 4/1-4/6, 4/13-4/30, 5/1-		
		5/6, 5/8-5/28, 6/16-6/20, 6/22-6/27	828	148
13	88	2/18, 2/19, 2/23, 2/24, 2/26, 2/27, 3/2-		
		3/5, 3/9-3/12, 3/15-3/19, 3/21, 3/23,		
		3/25, 3/26, 3/28-3/31, 4/1-4/4, 4/6-		
		4/10, 4/13, 4/14, 4/16, 4/19-4/21, 4/23-		
		4/27, 4/30, 5/1, 5/3, 5/5, 5/7, 5/8, 5/10-		
		5/12, 5/14-5/16, 5/18-5/26, 5/29-5/31,		
		6/1, 6/2, 6/4-6/6, 6/8-6/13, 6/15, 6/16,		
		6/18-6/21, 6/23, 6/24, 6/26, 6/27, 7/9-	207	0.0
		7/11	207	96
14		4/4 4/0 4/40 4/45 4/45 4/45	1289	156
15		1/1-1/8, 1/10, 1/12, 1/16, 1/20, 1/23-		
33	9	24, 1/26-31, 2/2-2/6, 2/9-2/12, 2/14,	007	0.0
		2/16-22, 2/24-28, 3/2-7, 3/9-12, 3/14,	807	88

	9	3/16-18, 3/21-26, 3/28, 3/30-31, 4/1-2,		
		4/4, 4/6-8, 4/10-11, 4/13-18, 4/20-23,		
		4/25, 4/27-30		
16		6/17, 6/26	16	2
17	Bi R	3/9-3/20, 3/22, 3/24-3/31, 4/1-4/4, 4/6-		10100
		4/23, 4/25-4/30, 5/1, 5/2, 5/4-5/10,		
		5/12-5/28, 5/31, 6/1-6/4, 6/6, 6/8-6/18,		
		6/21-6/26, 7/8-7/11	655	102
18		2/6, 2/8-2/14, 2/16-2/21, 2/23-2/28,	1	
		3/17-3/19, 3/21-3/31, 4/1-4/17, 4/19-		
		4/26, 4/28-		
		4/30, 5/4-5/8, 5/10-5/16, 5/18-5/21,		
		5/23-5/31, 6/1-6/3, 6/5-6/7, 6/9-6/11,		
	200	6/13, 6/15-6/18, 6/21-6/24, 6/26, 6/27,		
		7/8, 7/10, 7/11	847	109
19	a d	1/25-1/30, 2/1-2/6, 2/8-2/14, 2/16-		
		2/18, 2/21-2/28, 3/2-3/5, 3/7-3/13,		
		3/15, 3/17-3/24, 3/26, 3/28-3/31, 4/1-		
		4/8, 4/11-4/16, 4/18-4/20, 4/23, 4/24,		
		4/26-4/29, 5/1-5/6, 5/8-5/15, 5/17,		
		5/19, 5/22-5/28, 5/30, 5/31, 6/1-6/11,		
		6/14-6/17, 6/19-6/24, 6/26, 7/8-7/11	1136	129
20		1/1, 1/2, 1/4-1/6, 1/9, 1/10, 1/15-1/17,		
		1/19-1/21	33	13
21	bt	4/12-4/17, 4/19, 4/20, 4/22, 4/24-4/27,		
		4/30, 5/1, 5/4-5/7, 5/11-5/13, 5/17-		
		5/21, 5/25-5/28, 5/31, 6/1, 6/3, 6/4,		
		6/8, 6/11-6/13, 6/16-6/18, 6/23-6/26	278	46
5)		Totals for all Drivers	9455	1418
		Total Days of Violations		183

• Failure to enroll 21 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. [21 counts]

A search of ALES's DMV EPN program with requester code shows ALES has been enrolled in the program since February 18, 2020. The program does not list the 21 employee-drivers listed in **Table 1 and Attachment 2** as being enrolled. My investigation disclosed that ALES operated with 21 employee-drivers for 183 days and completed 9455 trips without being enrolled into ALES's DMV EPN program [**Table 1**, **Attachment 4**].

• Failure to enroll 21 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), 5381, and G.O. 157-E, Part 10. [21 counts]

ALES's records show that it contracts with Anzavista Drug & Alcohol Testing (hereinafter Anzavista). On January 29, 2024, a Data Request was sent to Anzavista requesting ALES's drivers' enrollment information for the review period. On February 6, 2024, Anzavista responded to the Data Request and stated that ALES enrolled into their program on May 26, 2020, and had their program terminated on July 26, 2023. Anzavista verified that the 21 employee-drivers listed in **Table 1 and Attachment 2** have never enrolled in ALES's drug program. My investigation disclosed that ALES operated with 21 employee-drivers for 183 days and completed 9455 trips without being enrolled into ALES's drug program [**Table 1**, **Attachment 5**].

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 March 26, 2024, at San Francisco, California.

Aaron Pete, Enforcement Analyst

TABLE OF ATTACHMENTS

List of Attachments

- Attachment 1. Uber Data Request 12-20-23 and Uber Response 1-17-24
- Attachment 2. Uber Attachment
- Attachment 3. WCKP Declaration, Driver Statement Forms & LLC records
- Attachment 4. DMV EPN Requester Code
- Attachment 5. Response to Data Request from Anzavista on 2-6-24 re: ALES

ATTACHMENT 1

PUBLIC UTILITIES COMMISSION

505 Van Ness Ave. San Francisco, CA 94102



VIA ELECTRONIC MAIL ONLY

December 20, 2023

Uber Technologies, Inc. TCP 38150-B

Email:

Data Request: CPED-UBER-

Carrier: ALES, LLC, TCP 39341 B

Managing Members: Mansour Aleeshagh and Nasrin Tavakoli

Allafzadehazghadi

Due Date: January 3, 2024

NACL 127

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 Wednesday, January 3, 2024.

to:

Aaron Pete

California Public Utilities Commission

Consumer Protection and Enforcement Division

Email: aaron.pete@cpuc.ca.gov

Phone: (415) 703-2347

With a copy to:

Eric Hooks

California Public Utilities Commission

Consumer Protection and Enforcement Division

Email: eric.hooks@cpuc.ca.gov

Phone: (415) 703-2302

I

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, December 29, 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 why Uber is unable to respond to any portion of the Data Request.

Thank you for your cooperation.

Daron Pete

Aaron Pete, Enforcement Analyst

Consumer Protection and Enforcement Division

Transportation Enforcement Branch

Email: aaron.pete@cpuc.ca.gov Telephone: (415) 703-2347

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 NO. 1

Subject: ALES, LLC, TCP 39341 B

Managing Members: Mansour Aleeshagh and Nasrin Tavakoli

Allafzadehazghadi



The carrier states he contracted work with Uber and/or Raiser-CA LLC (Uber) on the Uber Black platform.

Please provide the following un-redacted data:

- 1. All waybills between Uber and ALES, LLC, TCP 39341 B from the period of January 1, 2023, through July 28, 2023. Waybills should have the following information:
 - 1. Name of carrier and TCP number.
 - 2. Vehicle license plate number.
 - 3. Driver's name.
 - 4. Name and address of the person requesting or arranging the charter.
 - 5. Time and date when the charter was arranged.
 - 6. Whether the transportation was arranged by telephone, written contract, or electronic communication.
 - 7. Number of persons in the charter group.
 - 8. Name of at least one passenger in the traveling party, or identifying information of the traveling party's affiliation.
 - 9. Points of origination and destination
- 2. Any contract agreement between Uber and ALES, LLC, TCP 39341 B.
- 3. Total passenger payments collected by Uber and total amounts Uber paid to ALES, LLC, TCP 39341 B from the period of January 1, 2023, through July 28, 2023
- 4. Vehicle Inspection reports for vehicles used by ALES, LLC, TCP 39341 B from the period of January 1, 2023, through July 28, 2023

END OF REQUEST



David Case West Operations Uber Technologies, Inc.

January 17, 2024

Via Email

Aaron Pete

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

Re: CPED-UBER-

Dear Mr. Pete:

In response to CPED-UBER- ("Data Request"), Uber Technologies, Inc. (TCP0038150-P) ("Uber") respectfully submits responsive information in Attachments A-G.

The information provided in Attachments is highly confidential and prohibited from public disclosure pursuant to General Order 66-D, § 3.2, the attached Declaration of Confidentiality and the Uniform Trade Secrets Act. Moreover, the information submitted in Attachment constitutes highly sensitive personal information that is not subject to public disclosure, and/or trade secret information that is highly proprietary and commercially sensitive such that, if released by the California Public Utilities Commission ("Commission"), it could give Uber's competitors an unfair business advantage. Accordingly, Uber requests that all submitted information be kept confidential, and that it be notified if any party seeks disclosure of this confidential information from the Commission.

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

Respectfully submitted,

/s/ David Case

Manager - Southwest Operations Uber Technologies, Inc.

Attachment A

Pursuant to Data Request: CPED-UBER Pursuant to Data Request: CPED-UBER ("Data Request") issued by the California Public Utilities Commission ("CPUC") on December 20, 2023, Uber Technologies, Inc. ("Uber") respectfully submits its responses in this Confidential

I. EXPRESS RESERVATIONS

- A. No response, limitation or lack thereof, set forth in this narrative shall be deemed an admission or representation by Uber as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.
- B. Uber has made best efforts to provide the requested data as it exists in our internal systems, but cannot guarantee the complete accuracy of the submitted data.
- C. Uber reserves the right to modify or supplement its responses, and the provision of any information pursuant to any request is not a waiver of that right.
- Uber reserves the right to rely, at any time, upon subsequently discovered information.
- E. These responses are made solely for the purpose of this Data Request and for no other purpose.

II. GENERAL OBJECTIONS AND QUALIFICATIONS

Uber objects to the questions in this Data Request to the extent that they rely on vague or undefined terms. Uber further objects to this Data Request to the extent that it seeks information pertaining to internal, non-public information regarding Uber's safety and compliance processes, including but not limited to plans, controls, policies, or processes that may be protected by the attorney-client privilege or attorney work product doctrine and seeks information that may be the subject of proprietary business information, trade secrets, or privacy rights.

III. CONFIDENTIALITY

Uber notes that the designated information submitted below in Attachment and the information referenced in Attachments shall be designated as highly confidential and prohibited from public disclosure pursuant to General Order 66-D Section 3.2, the attached Declaration of Confidentiality and the Uniform Trade Secrets Act. This information, if publicly disclosed, would create a breach of consumer privacy, and given the proprietary nature of the information, would also create substantial business harm to Uber.

IV. RESPONSES

<<<BEGIN CONFIDENTIAL>>>

Question 1: All waybills between Uber and ALES, LLC, TCP 39341 B from the period of January 1, 2023, through July 28, 2023. Waybills should have the following information:

- 1. Name of carrier and TCP number.
- 2. Vehicle license plate number.
- 3. Driver's name.
- 4. Name and address of the person requesting or arranging the charter.
- 5. Time and date when the charter was arranged.
- 6. Whether the transportation was arranged by telephone, written contract, or electronic communication.
- 7. Number of persons in the charter group.
- 8. Name of at least one passenger in the traveling party, or identifying information of the traveling party's affiliation.
- 9. Points of origination and destination

Response to Question 1:

Uber provides responsive waybill information for Ales, LLC in spreadsheet format in line with General Order 157-E, Part 3.01 in Attachment

Question 2: Any contract agreement between Uber and ALES, LLC, TCP 39341 B.

Response to Question 2:

A copy of the most recent Platform Access Agreement between Uber and ALES, LLC is provided as Attachment , regarding fares and additional information related to the provision of services via the Uber application in California, are provided as Attachments .

¹ Uber reports the rider's first name and the pickup zip code for the "name and address of person requesting or arranging the charter" value, but notes that the requesting party may not be the actual rider. Additionally, Uber does not share the last name or addresses of riders for privacy reasons. Uber reports the pickup time and date for the "time and date when charter was arranged" but notes that the actual time and date of the arrangement could differ for products like Uber Reserve, which allows riders to reserve trips in advance.

Question 3: Total passenger payments collected by Uber and total amounts Uber paid to ALES, LLC, TCP 39341 B from the period of January 1, 2023, through July 28, 2023.

Response to Question 3:

Uber provides a spreadsheet showing the aggregated total passenger payments collected by Uber and amounts paid to ALES, LLC (TCP 39341) from the period from January 1, 2023 through July 28, 2023 as Attachment The column "Amounts Paid to ALES, LLC" includes trip-related payments as well as Prop 22 healthcare benefit payments and other non-trip miscellaneous payments.

Question 4: Vehicle Inspection reports for vehicles used by ALES, LLC, TCP 39341 B from the period of January 1, 2023, through July 28, 2023.

Response to Question 4:

Uber provides vehicle inspection records submitted for the vehicles used by ALES, LLC (TECP 39341) to complete trips between January 1, 2023 and July 28, 2023 as Attachment Contact for Data Request Numbers 1 through 4

David Case, Manager, Southwest Operations
David Kang, Senior Strategic Operations Associate, Southwest Ops
Please contact through counsel: Alexander Larro, Uber Regulatory Counsel, at

<<<END CONFIDENTIAL>>>

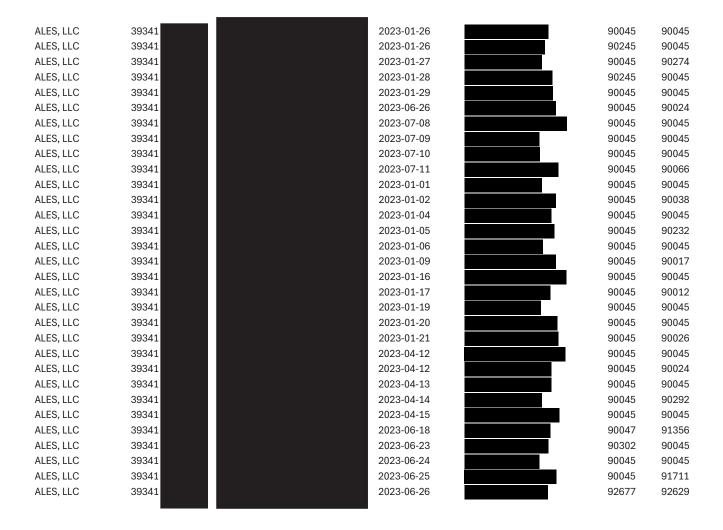
The information submitted in Attachment and the information referenced in Attachments shall be designated highly confidential and prohibited from public disclosure pursuant to General Order 66-D Section 3.2, the attached Declaration of Confidentiality and the Uniform Trade Secrets Act. This information, if publicly disclosed, would create a breach of consumer privacy and given the proprietary nature of the information, would create substantial business harm to Uber.

ATTACHMENT 2

name_of_car	riertcp_number license_pla	te driver_name begintrip_timestamp dropoff_timestamp rider_first_name beg	gin_zip dro	poff_zip
ALES, LLC	39341	2023-01-01	90014	90703
ALES, LLC	39341	2023-01-02	90245	90045
ALES, LLC	39341	2023-01-03	90045	90272
ALES, LLC	39341	2023-01-04	90245	90045
ALES, LLC	39341	2023-01-05	90045	90045
ALES, LLC	39341	2023-01-14	90045	91607
ALES, LLC	39341	2023-01-15	90245	90045
ALES, LLC	39341	2023-01-19	90245	90045
ALES, LLC	39341	2023-01-21	90045	92625
ALES, LLC	39341	2023-01-22	90245	90045
ALES, LLC	39341	2023-03-02	90045	90045
ALES, LLC	39341	2023-03-02	90245	90045
ALES, LLC	39341	2023-03-03	90045	91601
ALES, LLC	39341	2023-03-04	91505	90045
ALES, LLC	39341	2023-03-04	90245	90045
ALES, LLC	39341	2023-04-16	90045	90265
ALES, LLC	39341	2023-04-17	90066	90045
ALES, LLC	39341	2023-04-18	90045	90272
ALES, LLC	39341	2023-04-20	90745	90291
ALES, LLC	39341	2023-04-21	90245	90045
ALES, LLC	39341	2023-01-01	90245	90045
ALES, LLC	39341	2023-01-02	90245	90045
ALES, LLC	39341	2023-01-03	90305	90028
ALES, LLC	39341	2023-01-07	90036	91351
ALES, LLC	39341	2023-01-08	90245	90045
ALES, LLC	39341		90045	90808
ALES, LLC	39341		90245	90045
ALES, LLC	39341		90045	91605
ALES, LLC	39341		90245	90045
ALES, LLC	39341		90245	90045
ALES, LLC	39341	2023-01-01	90045	90755
ALES, LLC	39341	2023-01-01	90245	90045
ALES, LLC	39341	2023-01-02	90045	90210
ALES, LLC	39341	2023-01-08	90045	91436
ALES, LLC	39341	2023-01-14	90245	90045
ALES, LLC	39341	2023-02-20	90045	90045
ALES, LLC	39341	2023-02-25	90245	90045
ALES, LLC	39341	2023-02-26	90045	90045
ALES, LLC	39341	2023-04-15	90245	90045
ALES, LLC	39341	2023-05-08	90045	90045
ALES, LLC	39341	2023-05-29	90045	91606
ALES, LLC	39341	2023-05-30	90045	90045
ALES, LLC	39341	2023-05-31	90245	90045
ALES, LLC	39341	2023-06-01	92802	90045
ALES, LLC	39341	2023-06-02	90045	92626
ALES, LLC	39341	2023-07-07	90245	90045
ALES, LLC	39341	2023-07-08	90045	90045
ALES, LLC	39341	2023-07-09	90045	90045
ALES, LLC	39341	2023-07-10	90045	92647
ALES, LLC	39341	2023-07-11	92802	90045
ALES, LLC	39341	2023-06-26	90245	90045
ALES, LLC	39341	2023-06-27	90245	90045
ALES, LLC	39341	2023-03-29	90245	90045
ALES, LLC	39341	2023-03-30	90045	90045

ALES, LLC	39341	2023-03-31	90045 90069
ALES, LLC	39341	2023-03-31	90045 90046
ALES, LLC	39341	2023-04-01	90045 90045
ALES, LLC	39341	2023-04-14	90045 90033
ALES, LLC	39341	2023-04-15	90045 90028
ALES, LLC	39341	2023-04-16	90045 90045
ALES, LLC	39341	2023-04-17	90045 90015
ALES, LLC	39341	2023-04-18	90045 90045
ALES, LLC	39341	2023-01-02	90045 90245
ALES, LLC	39341	2023-01-03	92649 90045
ALES, LLC	39341	2023-01-04	90045 90015
ALES, LLC	39341	2023-01-05	90045 90025
ALES, LLC	39341	2023-01-06	90045 90045
ALES, LLC	39341	2023-06-17	90045 90245
ALES, LLC	39341	2023-06-18	90045 90272
ALES, LLC	39341	2023-06-21	90701 90045
ALES, LLC	39341	2023-06-22	90045 90017
ALES, LLC	39341	2023-06-23	90293 90045
ALES, LLC	39341	2023-05-04	90045 90021
ALES, LLC	39341	2023-05-05	90245 90045
ALES, LLC	39341	2023-05-05	90045 91403
ALES, LLC	39341	2023-05-06	90245 90045
ALES, LLC	39341	2023-05-06	90045 90245
ALES, LLC	39341	2023-07-07	90045 90045
ALES, LLC	39341	2023-07-07	90045 90015
ALES, LLC	39341	2023-07-08	90250 90045
ALES, LLC	39341	2023-07-09	90045 90045
ALES, LLC	39341	2023-07-10	90044 90045
ALES, LLC	39341	2023-01-01	90045 90017
ALES, LLC	39341	2023-01-02	90015 90045
ALES, LLC	39341	2023-01-03	90045 90274
ALES, LLC	39341	2023-01-04	90710 90670
ALES, LLC	39341	2023-01-05	90715 90045
ALES, LLC	39341	2023-01-06	90045 90016
ALES, LLC	39341	2023-01-07	J 90280 90045
ALES, LLC	39341	2023-01-08	90045 90292
ALES, LLC	39341	2023-04-27	90292 90045
ALES, LLC	39341	2023-04-28	90250 90045
ALES, LLC	39341	2023-04-29	90301 90045
ALES, LLC	39341	2023-04-30	90045 90045
ALES, LLC	39341	2023-05-01	92626 90045
ALES, LLC	39341	2023-06-20	90049 90266
ALES, LLC	39341	2023-06-21	90015 90015
ALES, LLC	39341	2023-06-22	90245 90045
ALES, LLC	39341	2023-06-23	90045 90045
ALES, LLC	39341	2023-06-23	90045 90036
ALES, LLC	39341	2023-01-01	90045 90291
ALES, LLC	39341	2023-01-02	90045 90045
ALES, LLC	39341	2023-01-03	90706 90045
ALES, LLC	39341	2023-01-04	90045 90045
ALES, LLC	39341	2023-01-05	90045 90291
ALES, LLC	39341 39341	2023-06-23 2023-06-24	90045 90045 90045 90045
ALES, LLC			
ALES, LLC ALES, LLC	39341 39341	2023-06-25 2023-06-26	90045 90265 90045 90045
ALLO, LLO	55341	2023-00-20	90045

ALES, LLC	39341	2023-06-27 90045	
ALES, LLC	39341	2023-02-18 90019	
ALES, LLC	39341	2023-02-19 90405	
ALES, LLC	39341	2023-02-23 90291	
ALES, LLC	39341	2023-02-24 90045	
ALES, LLC	39341	2023-02-26 90045	90069
ALES, LLC	39341	2023-06-26 90045	91801
ALES, LLC	39341	2023-06-27 90005	90401
ALES, LLC	39341	2023-07-09 90045	90045
ALES, LLC	39341	2023-07-10 90045	90301
ALES, LLC	39341	2023-07-11 90045	90045
ALES, LLC	39341	2023-01-01 90045	90045
ALES, LLC	39341	2023-01-03	90045
ALES, LLC	39341	2023-01-04	90401
ALES, LLC	39341	2023-01-05	90045
ALES, LLC	39341	2023-01-06	
ALES, LLC	39341	2023-06-23	90401
ALES, LLC	39341	2023-06-24 90292	90045
ALES, LLC	39341	2023-06-25	
ALES, LLC	39341	2023-06-26	
ALES, LLC	39341	2023-06-27 90045	
ALES, LLC	39341	2023-01-01 90045	
ALES, LLC	39341	2023-01-02 90045	
ALES, LLC	39341	2023-01-03 90045	
ALES, LLC	39341	2023-01-04 90045	
ALES, LLC	39341	2023-01-04 2023-01-05 90045	
ALES, LLC	39341	2023-04-25 90017	
ALES, LLC	39341	2023-04-27 90245	
ALES, LLC	39341	2023-04-27 9024-27 90045	
ALES, LLC	39341	2023-04-29 90403	
ALES, LLC	39341	2023-04-30 90045	
ALES, LLC	39341	2023-06-17 90045	
ALES, LLC	39341	2023-06-26 90245	
ALES, LLC	39341	2023-03-09 90045	
ALES, LLC	39341	2023-03-10 90045	
ALES, LLC	39341	2023-03-11 90045	
ALES, LLC	39341	2023-03-11 90045	
ALES, LLC	39341	2023-03-12 90045	
ALES, LLC	39341	2023-06-26 90045	
ALES, LLC	39341	2023-07-08 90045	
ALES, LLC	39341	2023-07-09	
ALES, LLC	39341	2023-07-10 90045	
ALES, LLC	39341	2023-07-11 90245	
ALES, LLC	39341	2023-02-06 90045	
ALES, LLC	39341	2023-02-08	
ALES, LLC	39341	2023-02-09 90045	
ALES, LLC	39341	2023-02-10 90045	
ALES, LLC	39341	2023-02-10 90045	
ALES, LLC	39341	2023-02-11 90045	
ALES, LLC	39341	2023-06-26 90045	
ALES, LLC	39341	2023-06-27	
ALES, LLC	39341	2023-07-08	
ALES, LLC	39341	2023-07-10 90045	
ALES, LLC	39341	2023-07-11 90045	
ALES, LLC	39341	2023-01-25	90027



ATTACHMENT 3

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

	YOUR FILE NUMBER
Carrier Name: ALES, LLC	PSG#: 39341
	PSG#:
When you fill out this form, remember that the any other persons employed in your carrier of	e term "employee" includes clerical persons as well as drivers and perations.
	ORATION, please note that you are not subject to the workers' ave employees who reside in California. If you have employees ot check "A".
If you ampley paragrain your carrier aparatio	no in any manner that makes you subject to the workers'
compensation laws of California, have your in	ns in any manner that makes you subject to the workers' surance company submit proof of insurance via PUC Insurance are issued by the Director of Industrial Relations.
Check one of the following (read both before	choosing):
Workers' compensation Declaration	Form to the Commission and contact my insurance company at te of coverage mailed to the Commission.
now have employees, but will emploinsurance company and have the	ox also applies to applicants for a permit or certificate who do not by workers upon commencement of operations.) I will contact my required certificate of coverage mailed to the Commission. I ll not issue or reinstate a permit or certificate until it receives my
	CERTIFICATION
requirement regarding workers' compensa-	perjury, that I (we) have read and understand the above ation and that I (we) am (are) able to and will comply with it. I perjury, that the foregoing is true and correct.
Date: 06/16/2020	MANSOUR ALEESHAGH
	Print Name of Applicant(s)
	Signature of Applicant(s)
	x X
	Signature of Corporate Officer
	MANAGING MEMBER
	Title of Corporate Officer

PUBLIC UTILITIES COMMISSION



CHARTER-PARTY CARRIER AUTHORITY DRIVER STATEMENT OF APPLICANT

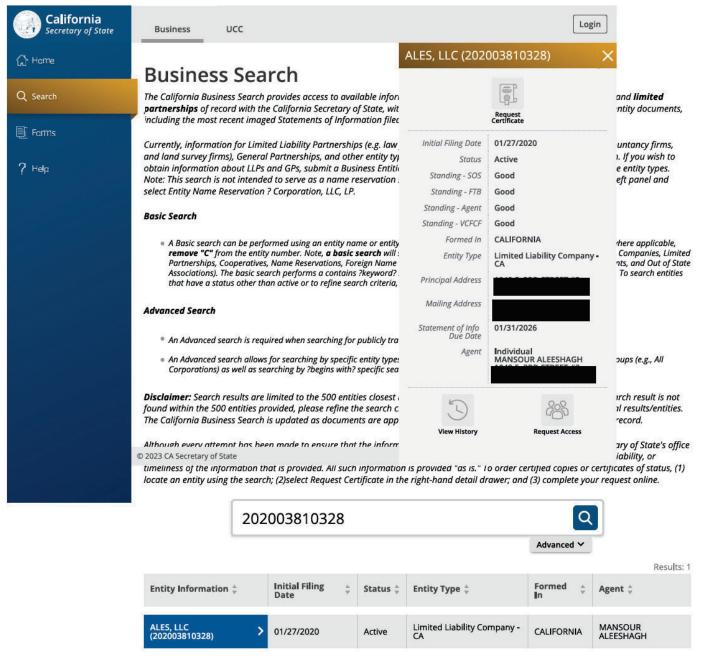
PSG/TCP CARRIER NAME ALES, LLC		FICTITIOUS BU ALES, LL		ME / DBA (IF ANY)
BUSINESS ADDRESS	CITY	STATE	ZIP	PHONE
EMAIL ADDRESS				MV REQUESTOR CODE

Applicant proposes to employ the following drivers (including applicant if applicable), providing each driver is eligible for a driving certificate. This statement must be a complete list of all drivers employed by your company.

				EQR.	ONLY	(3)
CALIFORNIA DRIVER LICENSE NO.	BIRTH DATE MM/DD/YY	NAME OF DRIVER (as appears on driver license)	% OF OWNERSHIP MEMBER/OFFICER	LICENSE CLASS	STATUS	3/2
	C)	MANSOUR ALEESHAGH	80%			19.
					S 45 3	
				No.		

CONTINUE ON NEXT PAGE IF NECESSARY

Date: 06/16/2020	MANSOUR ALEESHAGH
500 C (10 C)))))))))))))))))))))))))))))))))))	Print Name of Applicant(s)
	x te
	Signature of Applicant(s)







LLC Registration - Articles of Organization

Entity Name: ALES, LLC

Entity (File) Number: 202003810328

File Date: 01/27/2020
Entity Type: Domestic LLC
Jurisdiction: California

Detailed Filing Information

1. Entity Name: ALES, LLC

2. Business Addresses:

 Initial Street Address of Designated Office in California:

b. Initial Mailing Address:

3. Agent for Service of Process: MANSOUR ALEESHAGH

4. Management Structure: All LLC Member(s)

Purpose Statement: The purpose of the limited liability

company is to engage in any lawful act or activity for which a limited liability company may be organized under the California Revised Uniform Limited

Liability Company Act.

Future File Date Of: January 27, 2020

Electronic Signature:

The organizer affirms the information contained herein is true and correct.

Organizer: MANSOUR ALEESHAGH





BA20231212334



STATE OF CALIFORNIA Office of the Secretary of State STATEMENT OF INFORMATION LIMITED LIABILITY COMPANY

California Secretary of State 1500 11th Street Sacramento, California 95814 (916) 653-3516 For Office Use Only

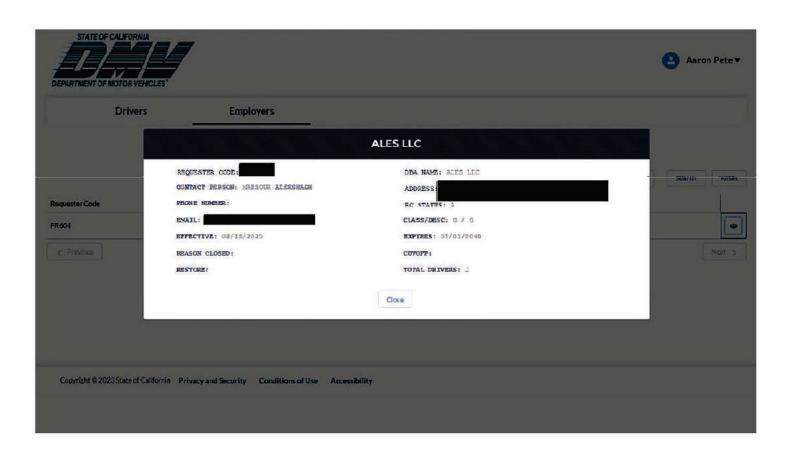
-FILED-

File No.: BA20231212334 Date Filed: 8/2/2023

NOTIFICATION PARKET INCOMENT	
Entity Details	ALEC LLC
Limited Liability Company Name	ALES, LLC
Entity No.	202003810328
Formed In	CALIFORNIA
Street Address of Principal Office of LLC	
Principal Address	
Mailing Address of LLC	
Mailing Address	
Attention	į.
Street Address of California Office of LLC	
Street Address of California Office	
Manager(s) or Member(s)	*
Manager or Member Name	Manager or Member Address
+ MANSOUR ALEESHAGH	
Agent for Service of Process Agent Name	MANSOUR ALEESHAGH
Agent Address	MANSOOR ALEESHAGH
Agent Address	
Type of Business	
Type of Business	GROUND PASSENGER TRANSPORTATION
Email Notifications	
Opt-in Email Notifications	Yes, I opt-in to receive entity notifications via email.
1704	
Chief Executive Officer (CEO)	
Chief Executive Officer (CEO) CEO Name	CEO Address

Labor Judgment	
	California Corporations Code section 17702.09(a)(8), has an ion of Labor Standards Enforcement or a court of law, for which no e order or provision of the Labor Code.
Electronic Signature	
By signing, I affirm under penalty of perjury the California law to sign.	at the information herein is true and correct and that I am authorized by
	20,702,70222
MANSOUR ALEESHAGH	08/02/2023

ATTACHMENT 4



12/12/23, 2:31 PM

dmvepn.my. site.com/audit/apex/auditCommunityDrivers? dlNumber=&driverName=&requesterCode=FR604& addDate=&deleteD...

Driver List

Driver Name	DL Number	Requester Code	Add Date	Delete Date	Status
			01/20/2022	07/05/2023	Deleted
			02/18/2020		Enrolled
			07/05/2023	11/15/2023	Deleted
			11/12/2021	11/15/2023	Deleted
			11/12/2021	11/15/2023	Deleted
			11/12/2021	11/15/2023	Deleted
			01/20/2022	11/15/2023	Deleted
			11/12/2021	11/15/2023	Deleted
		-	11/12/2021	11/15/2023	Deleted
			11/12/2021	11/15/2023	Deleted
			11/12/2021	11/15/2023	Deleted

DEPARTMENT OF MOTOR VEHICLES

INFORMATION SERVICES BRANCH EMPLOYER PULL NOTICE UNIT MS H265 P.O. BOX 944231 SACRAMENTO, CA 94244



Employer Pull Notice Account Approval Letter

Date: 02/1 8/2020

Legal Contract Na	me: ALES LLC	Requester Co
ATTN To	: MANSOUR ALEESHAGH	
Mailing address	:	
City, State, Zip Co	de :	

Your Employer Pull Notice (EPN) Account application has been approved, effective on the above date. Information regarding EPN accounts, including requirements and responsibilities associated with receiving Department of Motor Vehicles (DMV) driver records, are available at: www.dmv.ca.gov. Any violation or non-compliance, including misuse of information, may result in cancellation of your account, in addition to civil or criminal penalties.

Please retain this letter for your records. When communicating with DMV regarding your account, you will be asked to provide your Requester Code. You are required to keep your Requester Code, and all information received pursuant to your EPN account, confidential. Your Requester Code and DMV information may not be shared without prior express authorization from DMV.

Within ten (10) business days you will begin receiving driver records of enrolled drivers. Billing invoices will be sent from the Automated Billing Information Services (ABIS) unit to the address provided on your application. Failure to pay your invoices timely may result in cancellation of your EPN account.

If information contained in your EPN application has changed, you must submit a Notice of Change form (INF 4) within ten (10) days of the change. Failure to notify the DMV may result in cancellation of your EPN account.

You may contact the Employer Pull Notice unit by calling (916) 657-6346.

EPN Representative ID.

Employer Pull Notice
Information Service Branch

ATTACHMENT 5

STATE OF CALIFORNIA Gavin Newsom, Governor

PUBLIC UTILITIES COMMISSION

505 Van Ness Avenue San Francisco, CA 94102



January 29, 2024

Case No.: PSG-5964

TCP: 39341 B

Anzavista Drug & Alcohol Testing Attn: Steve Uwagboe 8726 S. Sepulveda Blvd., Suite E Los Angeles, CA 90045

Email: info@anzavista.com

Dear Steve Uwagboe:

Re: Data Request No. PSG-

Data Request for Review period January 1, 2023, through July 28, 2023

Passenger Carrier Company: ALES, LLC, TCP 39341 B

Attn: Mansour Aleeshagh and Nasrin Tavakoli Allafzadehazghadi

Due Date: February 5, 2024

The California Public Utilities Commission's (CPUC) Consumer Protection and Enforcement Division (CPED) requests the information listed in the attachment. If you have any questions, do not hesitate to contact me via email, at aaron.pete@cpuc.ca.gov or telephone, at (415) 703-2347. Please provide the information on or before February 5, 2024, to aaron.pete@cpuc.ca.gov.

If for any reason, you are unable to respond to this data request by February 5, 2024, please provide a written explanation by 5:00 p.m. on February 1, 2024, explaining why you cannot meet the due date, and when you anticipate providing the requested information.

Thank you for your cooperation.

Sincerely,

Aaron Pete, Enforcement Analyst

Consumer Protection and Enforcement Division

Transportation Enforcement Branch

Email: aaron.pete@cpuc.ca.gov

Telephone: (415) 703-2347

Aaron Pete

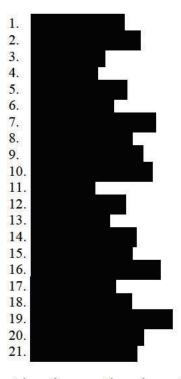
cc: Eric Hooks, Program & Project Supervisor

Attachment

DATA REQUEST NO. PSG-5964-01

Data Request for Review Period January 1, 2023, through July 28, 2023

- 1. The date ALES, LLC was enrolled and the expiration date.
- 2. Status of the ALES, LLC's contract. Were they in compliance during the review period in question and what is their status?
- 3. List of all drivers enrolled under ALES, LLC's contract with your consortium; include dates drivers were added or deleted.
- 4. Were the drivers listed below enrolled in ALEX, LLC's drug consortium program during the review period?



5. If the contract is no longer active, please state the reason(s).

From: <u>tiaijah@anzavista.com</u>

To: Pete, Aaron

Cc: steve@anzavista.com

Subject: [EXTERNAL] RE: Data Request to Drug Consortium PSG-5964 1.29.24.pdf regarding Passenger Carrier Company:

ALES, LLC, TCP 39341 B

Date: Tuesday, February 6, 2024 6:03:47 PM
Attachments: LIST OF ENROLLED DRIVERS .pdf
SERVICE CONTRACT 001.pdf

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.

I have attached a copy of the service contract and the list of enrolled drivers.

- 1. The date ALES, LLC was enrolled was 05/26/2020 and the service contract last for a 3-year term with a grace period. The expiration date was 07/26/2023.
- 2. During the time in question, they were in compliance to the best of our knowledge and the current status of the account is closed.
- 3. See attached file. No drivers were removed from the company during this time period.
- 4. None of the drivers listed were added to the drug consortium program during the requested time.
- 5. The account has been closed.

From: info@anzavista.com <info@anzavista.com>

Sent: Tuesday, February 6, 2024 10:40 AM

To:

Subject: FW: Data Request to Drug Consortium PSG-5964 1.29.24.pdf regarding Passenger Carrier

Company: ALES, LLC, TCP 39341 B

Importance: High

From: Pete, Aaron <aaron.pete@cpuc.ca.gov>
Sent: Monday, January 29, 2024 12:56 PM

To: info@anzavista.com

Subject: Data Request to Drug Consortium PSG-5964 1.29.24.pdf regarding Passenger Carrier

Company: ALES, LLC, TCP 39341 B

Importance: High

Good afternoon, Anzavista Drug & Alcohol 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>

[↑] www.cpuc.ca.gov



(DBA ANZAVISTA DRUG & ALCOHOL TESTING)

8726 S. Sepulveda Blvd., Suite E, Los Angeles, CA 90045 Tel: (310) 348-1314 • Fax: (310) 348-9005

LIST OF ENROLLED DRIVERS

Date: 02/06/2024		
Client's TCP or PSG No.:	39341 - B	_
Client's Business Name: ALES	, LLC	
Client's Address:		
Drug & Alcohol Program Desi	ignated Employer Re	presentative:
MANSOUR ALEESHAGH		
Enrolled Drivers: 1. Name: MANSOUR ALEES	ehagh	Enrollment Date
2. Name:		07/05/2023
3. Name:		11/12/2021
4. Name:		11/12/2021
5. Name:		11/12/2021
6. Name:		
7. Name:		
8. Name:	·	
9. Name:		
10.Name:		