

Appeal of Carey Limousine S.F. Inc. 1987 San Mateo Avenue, Suite 7 South San Francisco, CA 94080

In the amount of \$20,000 issued by the California Public Utilities Commission, Consumer Protection and Enforcement Division, Transportation Enforcement Branch

File No. TCP 9906-A

Citation No. T.2025-09-005

Case No.: CSE-000457

NOTICE OF APPEAL

Carey Limousine S.F. Inc. hereby files this Notice of Appeal from the Citation issued on or

about September 10, 2025 with a fine amount of \$20,000.

The rationale for the appeal is as follows:

1. Carey disputes that it utilized a sub-carrier in violation of G.O. 157-E, Part 3.04

without any valid sub-agreement. Instead, Carey contends that it previously provided the

Department with copies of compliant sub-carrier agreements for all of the carriers utilized by

Carey for the time period at issue.

2. Carey further disputes that it was in violation of G.O. 157-E, Part 1.06, Pub. Util.

Code § 5374.5 or Cal. Veh. Code § 34501. Carey contends that it made every reasonable request

to have the vehicles for any sub-carriers utilized during the time period in question with the

California Highway Patrol ("CHP"). However, the CHP was not available to conduct such bus

inspections prior to the event in question.

FILED 09/29/25 01:34 PM **K2509013** 3. Carey further disputes that it failed to provide the Department with waybills

containing all of the required information under G.O. 157-E, Part 3.01 for the time period in

question.

IN WITNESS WHEREOF, Carey Limousine S.F. Inc. hereby files its Notice of Appeal as of

September 29, 2025, electronically, pursuant to the Department's instructions.

Respectfully submitted,

SCOPELITIS GARVIN LIGHT HANSON & FEARY

By: <u>/s/ Timothy W. Wiseman</u>

Timothy W. Wiseman

By: /s/ Christopher C. McNatt, Jr.

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