PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

June 16, 2022

Agenda ID #20723

TO PARTIES OF RECORD IN DRAFT RESOLUTION ALJ-418:

This is the draft Resolution of Administrative Law Judge (ALJ) Margery Melvin resolving K.20-06-003. It will not appear on the Commission's agenda sooner than 30 days from the date it is mailed. The Commission may act then, or it may postpone action until later.

When the Commission acts on the draft resolution, it may adopt all or part of it as written, amend or modify it, or set it aside and prepare its own order. Only when the Commission acts does the resolution become binding on the parties.

You may serve comments on the draft resolution. Comments shall be served (but not filed) within 20 days of the date that the draft Resolution was mailed and published on the Commission's website [link], as provided in Rule 14.5 of the Commission's Rules of Practice and Procedure. Comments shall be served upon all persons on this proceeding's service list and on ALJ Melvin at mmv@cpuc.ca.gov.

/s/ ANNE E. SIMON

Anne E. Simon Chief Administrative Law Judge

AES:sgu

Attachment

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Resolution ALJ-418 Administrative Law Judge Division [Date]

RESOLUTION

RESOLUTION ALJ-418. Resolves K.20-06-003, the Appeal of David Gorgoyan, doing business as Celebrity Rides (PSG-5146, TCP 35518-B) from Citation Number F-5663.

SUMMARY

This resolution resolves the appeal of David Gorgoyan, doing business as (d/b/a) Celebrity Rides, from Citation Number F-5663 by the California Public Utilities Commission's Transportation Enforcement Branch, South Consumer Protection and Enforcement Division. Specifically, in Citation F-5653, the Commission's Transportation Enforcement Branch, South Consumer Protection and Enforcement Division alleged that David Gorgoyan, an individual (d/b/a) Celebrity Rides operated as a charter-party carrier during the Investigation Period with a suspended license and did not have evidence of Public Liability and Property Damage insurance coverage in effect and on file with the Commission during the Investigation Period. The appeal is denied, and the penalty amount is due in full. K.20-06-003 is closed.

BACKGROUND

The California Public Utilities Commission (Commission) regulates charter-party carriers of passengers primarily pursuant to the Passenger Charter-Party Carriers' Act (Public Utilities Code Section 5351, *et seq.*). Pursuant to Resolution ALJ-187, issued by the Commission on September 22, 2005, the Consumer Protection and Enforcement Division (CPED) is authorized to issue citations to various classes of transportation carriers for violation of the Public Utilities (Pub. Util.) Code and/or Commission orders. In turn, a carrier issued such citation may accept the fine or contest it through a process of appeal under Resolution ALJ-299.

On May 7, 2020, the Commission's Transportation Enforcement Branch, South Consumer Protection and Enforcement Division (CPED) issued Citation F-5663 to David Gorgoyan, an individual (d/b/a) Celebrity Rides (Appellant or Celebrity Rides) (collectively referred to as, parties) for violations of Pub. Util. Code Sections (§§) 5374, 5378.1, 5381, 5389, 5391, and General Order (G.O.) 115-G, G.O. 157-E, Part(s) 5.02, 6.01,

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and 10, and California Vehicle Code (CVC) Section 1808.1. The underlying investigation covered the period of April 1, 2018 through September 30, 2019. The citation was issued for the following violations:

- 1. Operated as a charter-party carrier without evidence of Public Liability and Property Damage (PL&PD) insurance coverage in effect and on file with the Commission in violation of Pub. Util. Code § 5391 and G.O. 115-G [331 counts];
- 2. Engaged at least 9 employee-drivers without evidence of workers' compensation insurance in effect and on file with the Commission and while operating on a suspended license in violation of Pub. Util. Code § 5378.1 [9 counts];
- 3. Failed to enroll 9 drivers in the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) Program in violation of Pub. Util. Code § 5374(a)(1)(D), G.O. 157-E, Part 5.02 and the California Vehicle Code (CVC) § 1808.1 [9 counts];
- 4. Failed to enroll 9 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 G.O. 157-E, Part 10 [9 counts]; and
- 5. Failed to produce and provide access to records in violation of Pub. Util. Code §§ 5381 and 5389 and G.O. 157-E, Part 6.01 [1 count].

Citation Number F-5663 includes a \$20,000 penalty for the above 359 counts.

On June 1, 2020, Appellant timely filed the instant appeal of Citation Number F-5663. CPED filed a compliance filing on June 12, 2020, which included a case summary of the underlying investigation.

RESOLUTION OF THE APPEAL

The Commission held an appeal hearing on July 29, 2021. Both parties appeared at the hearing represented by legal counsel. At the hearing, both parties were informed of the right to call, examine, and cross-examine witnesses and offer exhibits. The assigned Administrative Law Judge (ALJ) informed both parties of the burden of proof for the appeal at the hearing and gave parties the opportunity to ask questions.

Under ALJ-299, CPED has the burden to prove, by a preponderance of the evidence, that the citation was issued in compliance with the law and the Commission rules, and that the penalty amount is just and reasonable. Then the burden shifts to the Appellant to prove, by a preponderance of the evidence, that a violation did not occur or that the amount of the penalty is inappropriate.

1. First Violation in Citation No. F-5663: Operated as a charter-party carrier without evidence of Public Liability and Property Damage (PL&PD) insurance coverage in effect and on file with the Commission in violation of Pub. Util. Code § 5391 and G.O. 115-G [331 counts];

To uphold the first violation in Citation No. F-5663, the Commission would be required to find that, as a matter of fact, Appellant operated as a charter-party carrier during the Investigation Period with a suspended license. Additionally, the Commission would be required to find that, as a matter of fact, Appellant had employees, but did not have evidence of PL&PD insurance coverage in effect and on file with the Commission during the Investigation Period.

At the evidentiary hearing on July 29, 2021, CPED's witnesses, Investigators Steve Esguerra and Haydee Clarke, testified to the following sequences of events:

- On May 18, 2018, the Commission mailed Appellant an Order of Suspension, suspending Celebrity Rides effective May 18, 2018 for failure to maintain adequate insurance.
- On May 30, 2018, Appellant submitted invalid PL&PD policy.
- On April 30, 2019, the Commission mailed Appellant a Notice of Impending Suspension, requesting evidence of PL&PD insurance.
- On May 30, 2019, the Commission mailed Appellant an Order of Suspension for failure to maintain adequate insurance.
- On August 20, 2019, the Commission mailed the Appellant an Order of Suspension for failure to maintain a valid certificate of insurance on file.
- On September 9, 2019, Appellant e-mailed PL&PD Certificate dated [May 30, 2019].
- On October 2, 2019, Investigator Clarke provided appointment letter to Appellant, requesting records of PL&PD insurance from May 30, 2018, to May 20, 2020, workers' compensation insurance records from April 12, 2018, to April 12, 2019, and to appear at Commission's LA office on October 15, 2019.
- On October 28, 2019, Appellant e-mailed Investigator Clarke attesting Appellant did not have commercial insurance during the Investigation Period and did not need it because he did not have employees.

- On November 4 and November 5, 2019, Los Angeles International Airport (LAX) sent records of Celebrity Rides TCP 35518-B with three different vehicles on their account. One vehicle was at LAX nine different days between June 3, 2018, to July 22, 2018.
- On November 11, 2019, Lloyd's of America confirmed that that there was no record of Appellant's PL&PD insurance policy with the Lloyd's Market and that the National Association of Insurance Commissioners (NAIC) database did not recognize Appellant's NAIC number.
- On November 26, 2019, Uber provided trip receipts and payment statements (waybills) for Celebrity Rides TCP 35518-B, indicating that ten drivers drove between May 30, 2018, to September 30, 2019 while Appellant's TCP was suspended.

During the evidentiary hearing on July 29, 2021, Appellant tried to establish that he complied with the requirements of a TCP because Celebrity Rides did not have any employees, and therefore was not required to have PL&PD insurance.¹ Instead, Appellant testified that he only had ridesharing insurance through State Farm, which was both legal and sufficient for himself. Additionally, the drivers who drove his vehicles were not his employees, rather they were independent contractors with Uber, who rented his vehicles, and held their own ridesharing insurance.²

Following hearing, briefs were ordered via ruling.³ Parties were ordered to address what constitutes an employee versus a rideshare company, and whether the nine drivers that utilized Appellant's TCP number during the Investigation Period were employees. Only CPED filed a brief on this issue.

On brief, CPED explained that Celebrity Rides is not a rideshare, but is a Class-B charter-party carrier and is therefore subject to the Commission's requirement to have valid PL&PD insurance on file. G.O. 157-E specifies the difference between a Transportation Network Company (TNC), such as Uber, versus a TCP. Unlike a TCP, a TNC connects riders to drivers who utilize **their personal vehicles**, <u>not</u> vehicles purchased for *commercial purposes*. As CPED noted, "Uber shall not use the services of another carrier (sub-carrier) that provides the vehicle and the driver, unless the second carrier holds Commission authority as a charter-party carrier."

¹ Reporters Transcript (RT) at 95, lines 21 to 26; and p.97, lines 4 to 9.

² RT at 88, lines 8 to 24; RT at 85 at line 18; RT at 87 lines 7 to 12.

³ August 20, 2021 ALJ Ruling at 2.

⁴ CPED Opening Brief at 5.

CPED investigation showed that Appellant contracted with Uber under its TCP certificate as a licensed subcarrier. Pursuant to G.O. 157-E, Uber requested Appellant's TCP certificate information, a list of drivers, vehicle information, and proof of insurance. Although CPED showed Appellant's purported insurance policies did not exist, nonetheless, Appellant provided the requested information to present itself as a valid TCP. Despite providing Uber the list of drivers operating under his TCP number, Appellant testified the vehicles Appellant rented were not for their personal use.⁵ If the drivers sub-contract directly with Uber for ridesharing, they would have utilized their personal vehicles to provide rides, and not Appellant's commercial vehicles. Although Appellant denied operating as a TCP, CPED shows the Appellant complied with Uber's requests which meet Commission requirements for TNCs contracting with TCPs. Thus, by providing both the "vehicle and a driver" under its TCP number, Appellant operated as a Class-B charter-party carrier.

On brief, CPED explained that because the drivers used Appellant's TCP number, they are subject to the Commission's requirement to have valid PL&PD insurance on file. When a TCP number is required to perform a service, such as contracting with Uber as a sub-carrier, the TCP number ultimately provides access to customers that would be unavailable without it. As such, anyone utilizing a TCP number and benefitting from it is subject the Commission's requirements for TCPs. CPED's investigation determined that the nine drivers utilized Appellant's TCP number and vehicles to "get access to customers that they could not access without the TCP number." So, by operating under Appellant's TCP number as employees, Appellant and the nine drivers were required to have PL&PD insurance coverage.

Based on the testimony and evidence produced by CPED, CPED met their burden to show that Appellant operated as a charter-party carrier for a total of 331 days without evidence of PL&PD insurance coverage in effect and on file with the Commission in violation of Pub. Util. Code § 5391 and G.O. 115-G.

2. Second Violation in Citation No. F-5663: Engaged at least nine employee-drivers without evidence of workers' compensation insurance in effect and on file with the Commission in violation of Pub. Util. Code § 5378.1 [9 counts];

To uphold the second violation in Citation No. F-5663, the Commission must find that Appellant operated as a charter-party carrier during the Investigation Period with a

⁵ RT at 101, lines 11 to 27; 103, lines 6 to 11.

⁶ G.O. 157-E.

⁷ CPED Opening Brief at 6.

suspended license. Pub. Util. Code § 5378.1 requires every charter-party carrier to have a certificate of workers' compensation coverage for its employees. During its investigation, CPED learned that Appellant engaged the services of nine employeedrivers without evidence of workers' compensation insurance.

At the evidentiary hearing, CPED's Investigators testified to the following documents included in the compliance filing:

- On September 9, 2019, Appellant e-mailed PL&PD policy certificate, indicating that he did not have workers' compensation insurance.
- Uber waybills listing Appellant's nine employee-drivers.9
- On February 19, 2018, Appellant attested he did not have employees on the Workers' Compensation Declaration Form.
- On March 15, 2019, Appellant attested he did not have employees on the Workers' Compensation declaration Form.

During the evidentiary hearing, Appellant explained that while he knows the nine drivers listed on the Uber waybills, they are independently contracted with Uber.¹⁰

The resolution of the first violation establishes that the nine drivers were not independent contractors with Uber, rather they were Appellant's employees. The Uber waybills show that the nine listed employee-drivers utilized Appellant's TCP number. The Appellant was therefore subject to the Commission's requirement that the drivers be covered by an existing workers' compensation policy.

Based on the testimony and evidence cited above, CPED met the burden to show that Appellant engaged at least nine employee-drivers without evidence of workers' compensation insurance in effect and on file with the Commission in violation of Pub. Util. Code § 5378.1.

3. Third Violation in Citation No. F-5663: Failed to enroll 9 drivers in the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) Program in violation of Pub. Util. Code § 5374(a)(1)(D),

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⁸ CPED Compliance Filing at Attachment 7.

⁹ CPED Compliance Filing at Attachment 12.

¹⁰ RT at 85 to 86.

G.O. 157-E, Part 5.02 and the California Vehicle Code (CVC) § 1808.1 [9 counts];

To uphold the third violation in Citation No. F-5663, the Commission must find as a matter of fact that Appellant engaged nine employee-drivers working prior to enrollment in the DMV's EPN Program in violation of Pub. Util. Code §5374(a)(1)(D) and 5381 and G.O. 157-E, Part 5.02., and the California Vehicle Code (CVC) § 1808.1.

During the investigation, CPED discovered that Appellant engaged nine employee-drivers during Investigation Period before enrolling them in the DMV's EPN Program.

As detailed in the resolution for the first and second violations, Appellant communicated to CPED staff that he did not have any employees. During the evidentiary hearing, Appellant maintained this assertion and testified that since he was the only employee, only Appellant was enrolled in the DMV's EPN Program. ¹¹

During the evidentiary hearing, Investigator Esguerra testified to documents in CPED's Compliance Filing, showing that Appellant's nine employee-drivers were not enrolled in the EPN Program.¹² On October 28, 2019, CPED reviewed the DMV EPN system and confirmed that only Appellant, David Gorgoyan dba Celebrity Rides, was enrolled under requestor code DB604.¹³ Table 2 in CPED's Compliance Filing lists the days Appellant's nine employee-drivers listed on Uber's waybills operated without being enrolled in the EPN Program.¹⁴ The filing indicates that all drivers drove for a period of time during the Investigation Period.

Based on the testimony and evidence cited above, CPED has met the burden to show that Appellant engaged at least nine employee-drivers before enrolling them in the DMV's EPN Program in violation of Pub. Util. Code §5374(a)(1)(D) and 5381 and G.O. 157-E, Part 5.02., and the California Vehicle Code (CVC) § 1808.1.

4. Fourth Violation in Citation No. F-5663: Failed to enroll nine 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 G.O. 157-E, Part 10 [9 counts];

¹¹ RT at 85 to 86.

¹² RT at 52 to 53.

¹³ CPED Compliance Filing at 9; Attachment 17.

¹⁴ CPED Compliance Filing at 10.

To uphold the fourth violation in Citation No. F-5663, the Commission must find as a matter of fact that Appellant engaged nine employee-drivers prior to enrollment in the Controlled Substance and Alcohol Testing Certification Program for Pre-Employment Testing in violation of Pub. Util. Code § 5374(a)(1)(I) and G.O. 157-E, Part 10.

Through its investigation CPED determined that nine employee-drivers worked for Appellant prior to enrolling in the Controlled Substance and Alcohol Testing Certification Program.¹⁵ The documents¹⁶ indicated that drivers listed on Appellant's TCP with Uber drove to and from LAX during the Investigation Period. Table 2 in CPED's Compliance Filing shows that of the 10 employee-drivers listed, only Appellant, David Gorgoyan dba Celebrity Rides, was enrolled in the Program.

Based on the testimony and evidence cited to in CPED's filings, CPED has proven that Appellant engaged at least nine employee-drivers before enrolling them in the Controlled Substance and Alcohol Testing Certification Program in violation Pub. Util. Code § 5374(a)(1)(I) and G.O. 157-E, Part 10. As such, the fourth violation in Citation No. F-5663 stands and nine counts are appropriate.

5. Fifth Violation: Failed to produce and provide access to records in violation of Pub. Util. Code §§ 5381 and 5389 and G.O. 157-E, Part 6.01 [1 count].

To uphold the fifth violation in Citation No. F-5663, the Commission must find as a matter of fact that Appellant failed to produce and provide access to records in violation of Pub. Util. Code §§ 5381 and 5389 and G.O. 157-E, Part 6.01.

At the evidentiary hearing, CPED's witnesses testified to correspondence included in CPED's filing indicating that Appellant failed to produce records in violation of Commission rules. On October 2, 2019, CPED Investigator Haydee Clarke sent an appointment letter for Appellant to appear at the Commission's Los Angeles office and produce records.¹⁷ Investigator Esguerra confirmed that Appellant never produced the PL&PD insurance and workers' compensation records as required.¹⁸

At the hearing, Appellant maintained that he did not fail to produce the records, rather that it "does not concern" him because he was not required to have either PL&PD or

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 $^{^{15}}$ Compliance Filing at 10; Waybills provided by Uber and LAX vehicle records for Appellant's TCP number.

¹⁶ Ibid.

¹⁷ CPED Compliance Filing, Attachment 19.

¹⁸ RT at 54, lines 16 to 25.

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workers' compensation policies.¹⁹ As his only employee, Appellant contended that the State Farm ridesharing policy was sufficient for himself.²⁰

CPED's Opening Brief explained that Appellant complied with Uber's requirements for TCPs that the Uber contracts with. In doing so, Appellant provided a list of drivers and evidence of an invalid AIG insurance policy.²¹ Although CPED later determined the insurance policy was invalid, Appellant demonstrated no issue with providing requested records to Uber to contract with them.

As addressed above, the Commission finds that Appellant was subject to Commission requirements for TCPs by engaging employee-drivers. Accordingly, Appellant's claim that he didn't produce records because it "does not concern" him fails as a defense. Based on the testimony and evidence cited above, CPED has proven that Appellant failed to produce and provide access to records in violation of Pub. Util. Code §§ 5381 and 5389 and G.O. 157-E, Part 6.01, and the fifth violation stands.

ASSESMENT OF FINE

In assessing the reasonableness of the penalty accompanying citation number F-5663, we turn to D.98-12-075. In determining whether to impose a fine, and if so, at what level, the Commission will consider five factors: (1) the severity of the offense, (2) the person's or entity's conduct; (3) the person's financial resources; (4) precedent; and (5) the totality of the circumstances in furtherance of the public interest.

First as to severity of the offense, the size of the fine should be proportionate to the severity of the offense, based on the level of physical harm, harm to the regulatory process and the number and scope of violations. Here, Appellant operated as a charter-party carrier for a total of 331 days without PL&PD insurance and failed to enroll 9 employee drivers in the EPN Program. Due to the length of time and number of separate violations contained in Citation number F-5663, the \$20,000 penalty is proportionate to the 331 days of operation and nine employee drivers whom Appellant failed to provide proper insurance.

Second, we consider the entity's efforts to prevent, detect, and/or rectify the violation. While Appellant provided PL&PD insurance to the Commission in May 2019, CPED established that there was no record of insurance with Lloyd's of America, essentially proving Appellant falsified insurance records to the Commission. While Appellant

²⁰ RT at 88 lines 8 to 24.

¹⁹ RT at 99 lines 8 to 13.

²¹ CPED Compliance Filing at Attachment 16.

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tried to provide insurance, the fact he submitted fake insurance policies to the Commission to avoid suspension of his license does not show the Appellant tried to prevent or rectify the violation. Accordingly, the \$20,000 penalty is proportionate to the Appellant's conduct.

Third, we look to the person's financial resources. Appellant did not provide thorough accounting records in this proceeding. CPED provides waybills that we can surmise provided the Appellant with income during the investigation period. Given the Appellant sub-contracted nine employee drivers under his TCP number, we find the \$20,000 penalty to be within the Appellant's financial resources as a TCP operator.

Fourth, we consider Commission precedent. CPED consulted the range of fines assessed in several similar cases when setting the \$20,000 penalty and found the amount to be comparable to other charter-party carriers situated similarly. Considering the number of violations and to the degree the Appellant falsified information, we find the \$20,000 penalty to be reflective of the 359 above counts.

Fifth we turn to the totally of the circumstances in furtherance of the public interest. Here, Appellant provided his TCP and vehicles for drivers to use on public roadways, without obtaining the proper insurance. Considering the Appellant knowingly provided falsified documents and information to the Commission, the \$20,000 penalty is proportionate to deter further actions by this individual or other charter-party carriers similarly situated. We conclude the penalty contained in citation number F-5663 shall further the public interest by ensuring Appellant and other charter-party carriers meet their regulatory obligations under the Commission's jurisdiction.

SAFETY

The Commission has broad authority to regulate charter-party carriers, particularly regarding safety concerns. (*See* for example, Pub. Util. Code §§ 451, 5382 and 5387.) The Commission is mindful that the statutory schemes under which this citation was issued in this case are intended to secure the safety of charter-party carrier passengers and the general public.

COMMENTS

Pub. Util. Code § 311(g)(1) requires that a draft resolution be served on all parties and made available for to a public review and comment period of 30 days or more, prior to a vote of the Commission on the resolution. A copy of today's resolution was distributed for comment to the service list.

Pursuant to Rule 14.5, comments on this draft Resolution are due within 20 days of the date that notice of this draft Resolution was posted in the Commission's daily calendar.

ASSIGNMENT OF PROCEEDING

Margery Melvin is the assigned Administrative Law Judge for this citation appeal.

FINDINGS AND CONCLUSIONS

- 1. On May 17, 2019, Appellant submitted an invalid PL&PD policy.
- 2. On November 11, 2019, Lloyd's of America confirmed that that there was no record of Appellant's PL&PD insurance policy with the Lloyd's Market and that the National Association of Insurance Commissioners (NAIC) database did not recognize Appellant's NAIC number.
- 3. Appellant had nine employee-drivers use his TCP number.
- 4. Appellant operated as a charter-party carrier for a total of 331 days without PL&PD insurance coverage on file with the Commission in violation of Pub. Util. Code § 5391 and G.O. 115-G.
- 5. Appellant engaged at least nine employee-drivers without evidence of workers' compensation insurance in effect and on file with the Commission in violation of Pub. Util. Code § 5378.1.
- 6. Appellant engaged at least nine employee-drivers before enrolling them in the DMV's EPN Program in violation of Pub. Util. Code §5374(a)(1)(D) and 5381 and G.O. 157-E, Part 5.02., and the California Vehicle Code (CVC) § 1808.1.
- 7. Appellant engaged at least nine employee-drivers before enrolling them in the Controlled Substance and Alcohol Testing Certification Program in violation Pub. Util. Code § 5374(a)(1)(I) and G.O. 157-E, Part 10.
- 8. Appellant failed to produce records to the Commission in violation of Pub. Util. Code §§ 5381 and 5389 and G.O. 157-E, Part 6.01.

Therefore, IT IS ORDERED that:

- 1. The violations and penalties in Citation F-5598 are sustained.
- 2. The Appeal of David Gorgoyan, doing business as (d/b/a) Celebrity Rides is denied.

- 3. David Gorgoyan, doing business as (d/b/a) Celebrity Rides shall pay a fine of \$20,000 by check or money order, payable to the State of California's General Fund and mailed or delivered to the Commission's Fiscal Office at 505 Van Ness Avenue, Room 3000, San Francisco, CA 94102 within 30 days of the effective date of this resolution. Celebrity Rides shall write on the face of the check or money order "For deposit to the General Fund per Resolution ALJ-418"
- 4. K.20-06-003 is closed.

This resolution is effective today.	
I certify that the foregoing resolution was duly introd conference of the Public Utilities Commission of the S, the following Commissioners ve	State of California held on
	Rachel Peterson
	Executive Director

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

RESOLUTION ALJ-418. Resolves K.20-06-003, the Appeal of David Gorgoyan, doing business as Celebrity Rides (PSG-5146, TCP 35518-B) from Citation Number F-5663.

INFORMATION REGARDING SERVICE

I have electronically served all persons on the attached official service list who have provided an e-mail address for K.20-06-003.

Upon confirmation of this document's acceptance for filing, I will cause a copy of the filed document to be served by U.S. mail on all parties listed in the "Party" category of the official service list for whom no e-mail address is provided.

Dated June 16, 2022, at San Francisco, California.

/s/ SHANE GUTTO
Shane Gutto

NOTICE

Persons should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address to ensure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

The Commission's policy is to schedule hearings (meetings, workshops, etc.) in locations that are accessible to people with disabilities. To verify that a particular location is accessible, call: Calendar Clerk (415) 703-1203.

If specialized accommodations for the disabled are needed, e.g., sign language interpreters, those making the arrangements must call the Public Advisor at (415) 703-2074 or TDD# (415) 703-2032 five working days in advance of the event.

Resolution ALJ-418 ALJ/MMV/sgu

******* PARTIES ********

****** SERVICE LIST *******

Last Updated on 16-JUN-2022 by: KB3 K2006003 LIST

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