



Public Utilities Commission
STATE OF CALIFORNIA

CITATION FOR VIOLATION
OF PUBLIC UTILITIES CODE

To: Kiki Limo LLC.



File: TCP 40348-B

Citation#: T.2025-12-002

Date: December 3, 2025

Case #: CSE-578

VIOLATIONS

You are hereby cited with having violated sections of the Public Utilities (Pub. Util.) Code and a California Public Utilities Commission (CPUC) General Order (G.O.) as described below. These violations occurred from October 26, 2024, through June 16, 2025.

- (1) Failed to maintain its Equipment Statement, in violation of G.O. 157-E, Part 4.01 **[7 counts]**
- (2) Failed to enroll drivers into the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) Program violation of Pub. Util. Code section 5374(a)(1)(D), and G.O. 157-E, Part 5.02 **[12 counts]**
- (3) Failed to enroll drivers into the drug consultant program in violation of Pub. Util. Code section 5374(a)(1)(1), and G.O. 157-E, Part 10 **[10 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

TEB used the Penalty Assessment Methodology adopted in Resolution M-4846 and considered mitigating and exacerbating factors in setting the fine.

You are hereby called upon to answer this citation on or before December 23, 2025. By way of such answer, you may either:

- (1) Pay a fine of \$10,000 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 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 December 23, 2025, you will be in default and will have forfeited your right to appeal the Citation. In addition, your operating authority will be immediately suspended and may be subsequently revoked pursuant to Resolution ALJ-187. The Commission may also act through a civil or criminal proceeding to recover any unpaid fine and ensure compliance with applicable statutes and Commission orders.

Shirley Lei

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



Public Utilities Commission

STATE OF CALIFORNIA

CITATION COMPLIANCE AGREEMENT

File No.: TCP 40348-B
Citation #: T.2025-12-002
Date: December 3, 2025
Case #: CSE-578

I (we) hereby agree to comply with this citation dated December 23, 2025, and herewith pay the fine of \$10,000.

Kiki Limo LLC.

[Redacted Signature]
[Redacted Title]
[Redacted]
[Redacted]

(Signature)

(Title)

(Date)

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 email to our Fiscal Office at FiscalOffice-.TECitations@cpuc.ca.gov.

INVESTIGATION REPORT

CARRIER: Kiki Limo LLC
(Secretary of State Entity: 202102210574)

MEMBERS: Ihab Aldelfi, CEO
Oday Y Almubarak, Managing Member
Senan Alkharhi, Managing Member
Dahir Altai, Managing Member

AUTHORITY: TCP 40348-B

PHYSICAL ADDRESS: [REDACTED]

MAILING ADDRESS: [REDACTED]

PHONE/EMAIL: [REDACTED]

VEHICLES: 20

DRIVERS: 24

PL&PD INSURANCE: Philadelphia Indemnity Insurance Company
Policy Number: [REDACTED]
Effective Date: [REDACTED]

WORKERS' COMPENSATION INSURANCE: [REDACTED]

DRUG CONSORTIUM: [REDACTED]

INTRODUCTION

On June 18, 2025, I was assigned to investigate the operations and practices of Kiki Limo LLC (hereinafter referred to as Kiki Limo). During the San Diego Gaslamp Joint Operation with the San Diego Police Department on October 26, 2024, Transportation Enforcement Branch (TEB) staff observed a 2019 GMC (license plate [REDACTED]) operating while not being listed on Kiki Limo's equipment list.

VIOLATIONS

The investigation from October 26, 2024, to June 16, 2025, disclosed violations of the following provisions of the Public Utilities (Pub. Util.) Code and Commission General Orders (G.O.):

- **Failed to maintain its Equipment Statement, in violation of G.O. 157-E, Part 4.01 [7 counts].**

According to data provided by Uber on June 16, 2025, Kiki Limo operated 20 vehicles on the Uber platform [**Attachment 1**]. However, a review of the Transportation Licensing and Analysis Branch's (TLAB) TCP portal showed only six active vehicles listed on Kiki Limo's equipment list [**Attachment 2**]. A cross-reference between Uber's records and the TCP portal revealed that seven vehicles were added to the TCP portal after the fact (August 1, 2025), and one vehicle was never added at all [**Attachments 1, 2 and Table 1**].

Table 1: TCP Portal Date Added and Operation Dates

Vehicle License Plate	Date Added to TCP Portal	Dates of Operation
██████	8/1/2025	1/8/2025 - 6/3/2025
██████	8/1/2025	12/3/2024 - 6/9/2025
██████	8/1/2025	12/6/2024 - 6/9/2025
██████	Not Added	7/21/2024 - 5/18/2025
██████	12/13/2024	11/24/2021 - 6/7/2025
██████	8/1/2025	12/5/2024 - 6/9/2025
██████	8/1/2025	9/22/2023 - 6/8/2025

- **Failed to enroll drivers into the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) Program violation of Pub. Util. Code section 5374(a)(1)(D), and G.O. 157-E, Part 5.02 [12 counts].**

A search of the DMV online database shows that Kiki Limo enrolled in the EPN program under requestor code █████ listed only four drivers. Cross-referencing Uber's driver data revealed that nine drivers operated under Kiki Limo without being enrolled in the EPN program, and four drivers were enrolled months after operating [Attachments 1, 3 and Table 2].

Table 2 – DMV EPN (KV453) Enrolled Drivers

[illegible]

- **Failed to enroll drivers into the drug consultant program in violation of Pub. Util. Code section 5374(a)(1)(1), and G.O. 157-E, Part 10 [10 counts].**

Kiki Limo's drug consortium, the Substance Abuse Evaluation Resource Center (SAERC), has provided a list of enrolled drivers on July 21, 2025 [**Attachment 4**]. SAERC confirmed that only three drivers ([REDACTED]) were enrolled in the program. A comparison between Uber's drivers list and SAERC's records showed that ten drivers operated under Kiki Limo without enrollment in the drug testing consortium between March 1, 2024, and June 30, 2024 [**Attachments 1, 4 and Table 3**].

Table 3 – Drug Consortium Unreported Drivers

[illegible]

DECLARATION

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

Executed on December 03, 2025, in San Francisco, California.

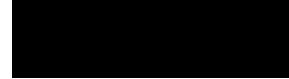
Mingfeng Li

Mingfeng Li, TEB Enforcement Analyst

List of Attachments

- Attachment 1.** Uber's Records (Vehicles and Drivers)
- Attachment 2.** TCP Portal Equipment (Vehicle) List
- Attachment 3.** EPN List of Kiki Limo's Drivers
- Attachment 4.** Email from Drug Consortium - SAERC (7/21/2025)

Attachment 1



June 16, 2025

Via Email

Mingfeng Li
Transportation Enforcement Branch
Consumer Protection and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
mingfeng.li@cpuc.ca.gov

***Re: Request for Information Regarding Kiki LTD. Liability Company
(TCP-40348)***

Dear Mr. Li:

In response to your June 9, 2025 email, please find Uber Technologies, Inc.'s ("Uber") response to the Transportation Enforcement Branch's ("TEB") inquiry requesting information regarding Kiki LTD. Liability Company (TCP-40348) ("KiKi LTD"):

Request: According to our records, this carrier has reported two vehicles with license plates [REDACTED] to the Commission. However, there are indications that additional vehicles may be operating under this permit. To support our investigation, we respectfully request your assistance in providing the following information:

- Whether the carrier is operating under Uber Black or solely on the general Uber platform;
- The total number of vehicles associated with this carrier on Uber, including each vehicle's VIN and license plate;
- The full name and driver's license number of each affiliated driver;
- The date of the most recent trip completed by each driver;
- The date each vehicle first began operating as Uber Black;
- The date of the most recent trip completed by each vehicle;
- All waybills for the vehicle with license plate [REDACTED] operating on October 26, 2024, and October 27, 2024.

Response:

**CONFIDENTIAL INFORMATION PURSUANT TO GENERAL ORDER 66-D,
SECTION 3.2, AND ACCOMPANYING DECLARATION (ATTACHMENT A)**

KiKi LTD currently is able to accept trips on the Uber platform, including Uber Black and other eligible ride offerings (e.g. Uber XL).

In the table below, Uber is providing a list of the vehicles that Kiki LTD has associated with its account on the Uber platform, consisting of each vehicle's VIN and license plate. Please note that this information is limited to that which is available via Uber's internal records, as Uber does not have access to the CPUC's records regarding drivers or vehicles that the carrier has disclosed to the CPUC (e.g., equipment lists). Uber is also including the date of the first trip and the date of the most recent trip taken by each vehicle on the Uber platform.

<u>VIN Number</u>	<u>Vehicle License Plate Number</u>	<u>Date of First Trip</u>	<u>Date of Most Recent Trip</u>
		11/24/2021	10/20/2024
		11/24/2021	6/7/2025
		3/22/2022	12/3/2022
		4/9/2022	10/29/2022
		6/9/2022	10/30/2022
		7/23/2022	10/10/2022
		9/29/2022	5/28/2023
		9/30/2022	11/6/2022
		10/22/2022	8/29/2024
		4/5/2023	6/18/2023
		9/22/2023	6/8/2025
		10/21/2023	2/23/2024
		7/14/2024	4/15/2025
		7/21/2024	5/18/2025
		7/24/2024	10/21/2024
		12/3/2024	6/9/2025
		12/5/2024	6/9/2025
		12/6/2024	6/9/2025
		12/17/2024	6/1/2025
		1/8/2025	6/3/2025

In the table below, Uber is providing a list showing the drivers' names, driver's license numbers, and the date of the most recent trip of each driver that has taken a trip under this carrier.

<u>Driver Name</u>	<u>Driver's License Number</u>	<u>Date of Most Recent Trip</u>
		5/18/2025
		12/30/2021
		6/3/2023
		1/23/2022
		2/20/2022
		11/5/2022
		4/4/2022
		6/7/2025
		11/6/2022
		4/19/2022
		12/21/2022
		10/10/2022
		1/16/2023
		12/3/2022
		4/22/2023
		10/3/2023
		2/27/2024
		9/25/2023
		2/23/2024
		10/17/2023
		1/14/2024
		1/24/2024
		5/28/2024

	6/8/2025
	8/21/2024
	3/22/2025
	8/29/2024
	4/15/2025
	6/3/2025
	10/20/2024
	11/8/2024
	6/9/2025
	6/9/2025
	6/8/2025
	5/11/2025
	4/22/2025
	4/28/2025
	6/9/2025

In Attachment B, please find a spreadsheet with the data for each waybill associated with an identified trip for the vehicle with license plate [REDACTED] operating on October 26, 2024, and October 27, 2024. Please note that Uber is not providing the waybills themselves in order to mitigate administrative burdens; please let us know if you need any additional information.

Should you have additional questions, please contact me at [REDACTED]

Respectfully submitted,

/s/ David Case
David Case



Attachment 2

Attachment 3

Driver List

Driver Name	DL Number	Requester Code	Add Date	Delete Date	Status
			10/22/2025		Enrolled
			11/22/2024		Enrolled
			07/25/2025		Enrolled
			07/25/2025		Enrolled

Attachment 4

Li, Mingfeng

From: [REDACTED]
Sent: Monday, July 21, 2025 9:37 AM
To: Li, Mingfeng
Subject: [EXTERNAL] Re: Kiki LTD Liability Company - Drug Consortium Service Information Request
Attachments: Ihab Aldelfi.pdf; Almubarak Oday.pdf; Senan Alkarhi.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.

Good Morning MR Li,

Sorry this took a little time. Unfortunately I am 73 and prone to medical issues. Here is the requested information. Carrier has been enrolled since 2021. The last Drug test performed was in 2024. A copy of their current contract is provided and they are currently enrolled with SAERC.

They have three drivers

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]

Have a great Day and Thanks, If you need anything else please let me know.

Sincerely

[REDACTED]

On Monday, July 7, 2025 at 04:00:08 PM PDT, Li, Mingfeng <mingfeng.li@cpuc.ca.gov> wrote:

Hi Mr. [REDACTED]

Per our conversation, Please provide the following information from your records relating to Kiki LTD. Liability Company

*List of all drivers enrolled under this carrier's contract and enrollment date for driver(s) January 1, 2022, to the present.