



Public Utilities Commission
STATE OF CALIFORNIA

CITATION FOR VIOLATION
OF PUBLIC UTILITIES CODE

To: Cosand Partners LLC
DBA: Elite Black Car Services
Attn: Chris Cosand



File: TCP 33731-B
Date: March 19, 2026
Citation#: T.2026-03-010
Case #: CSE-000751

VIOLATIONS

You are hereby cited with having violated section(s) of the Public Utilities Code (P.U. Code) and California Public Utilities Commission (CPUC) General Order (G.O.) as described below. These violations occurred during the period from July 1 to October 31, 2025.

- Utilized sub-carriers that did not possess Commission authority as a charter-party carrier or did not possess a valid sub-carrier agreement in violation of G.O. 157-E, Part 3.04 [**19 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 April 9, 2026. By way of such answer, you may either:

- (1) Pay a fine of \$ 9,200 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 April 9, 2026, 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.

Lana Tran Courney

Lana Tran-Courney
Consumer Protection and Enforcement Division
Transportation Enforcement Branch
Telephone number: (415) 385-5513
E-mail: lana.Tran-Courney@cpuc.ca.gov

Attachments



Public Utilities Commission

STATE OF CALIFORNIA

CITATION COMPLIANCE AGREEMENT

File No.: 33731 B (Active)

Citation # T.2026-03-010

Date: March 19, 2026

Case #: 000751

I (we) hereby agree to comply with this citation dated March 19, 2026, and herewith pay the fine of \$9,200.

Mr. Chris Cosand
Cosand Partners LLC
DBA: Elite Black Car Services



(Signature)

(Title)

(Date)

Automatic credit and debit card payments are available. To arrange for autopay, fill out the attached CREDIT OR DEBIT CARD AUTHORIZATION form and email it to our Fiscal Office at FiscalOffice-TECitations@cpuc.ca.gov.

Or

Payment (cashier check or money order) should be made payable to *the California Public Utilities Commission* and sent to:

California Public Utilities Commission
Attn: Fiscal Office
505 Van Ness Avenue
San Francisco, CA 94102-3298

COMPLIANCE FINDINGS REPORT

CARRIER: Cosand Partners LLC
Doing Business as: Elite Black Car Services
A California Corporation, Secretary of State Entity # 201416210160

OFFICERS: Chris Cosand, Chief Executive Officer

AUTHORITY: TCP¹ 33731 B (Active)

ADDRESS: [REDACTED]

PHONE/EMAIL: [REDACTED]

VEHICLES: 10

DRIVERS: 7

PL&PD² INSR: Philadelphia Indemnity Insurance Company
[REDACTED]

WKCP³ INSR: Pie Insurance Company (The)
[REDACTED]

DRUG CO.: [REDACTED]
Enrollees: 10

EPN⁴: [REDACTED]

1 Charter-Party Carrier (TCP)

2 Public Liability and Property Damage (PL&PD)

3 Workers' Compensation (WKCP)

4. Employees Pull Notice (EPN)

NARRATIVE

On October 28, 2025, I was assigned to perform a compliance records review for Cosand Partners LLC (hereinafter referred to as Cosand).

On October 30, 2025, I contacted Chris Cosand, Chief Executive Officer (CEO) via email [REDACTED] to introduce myself and explain our compliance review process. On October 31, 2025, I sent a data request letter [Attachment 1]. On November 13, 2025, Chris Cosand emailed the requested documents through the Microsoft Outlook from [REDACTED]

VIOLATIONS

Cosand Partners LLC provided the following documents: the carrier's Personal Liability and Property Damage (PL&PD) insurance, the carrier's Workers' Compensation (WKCP) insurance, waybills from July 1, 2025 to September 30, 2025, list of sub-carriers, the carrier's current Controlled Substance and Alcohol Testing Program service agreement, and the carrier's drivers' pre-employment and random drug test results for the past six months, Vehicle accident records including insurance loss runs showing dates of accidents and drivers' names for the last five (5) years.

The records reviewed from July 1, 2025, to October 31, 2025, disclosed the following violation of the Public Utilities Code (PU Code) and the Commission's General Order (G.O.) 157-E:

- **Utilized sub-carriers that did not possess Commission authority as charter-party carriers and sub-carriers without valid sub-carrier agreements in violation of G.O. 157-E, Part 3.04 [19 counts].**

According to General Order 157-E, Part 3.04, Sub-Carriers, a carrier shall not use the services of another carrier (subcarrier) that provides the vehicle and the driver, unless the second carrier holds Commission authority as a charter-party carrier. The agreement for the utilization of the second carrier's vehicle(s) and driver(s) by the operating carrier shall be evidenced by a written document, and shall contain the carriers' names, TCP numbers, and the services to be provided.

On November 13, 2025, Cosand provided waybill data in an Excel spreadsheet listing twenty-seven (27) service providers, which included both interstate and intrastate operations via email [Attachment 2]. Of the twenty-seven providers listed, sixteen (16) were identified as operating intrastate services.

On December 24, 2025, Cosand failed to provide subcarrier agreements with the sub-carriers. As per GO 157-E 3.04, carriers' names and TCP information are required. Cosand sent a rental agreement form to its partners that have no space for carriers' names or TCP numbers [Attachment 3]. Cosand provided 'Rental Agreement Terms' but failed to provide subcarrier agreements for the sixteen sub-carriers.

Table 1
List of Subcarriers without Sub-carrier Agreements

Name	TCP Status and comments	Subcarrier Agreement
AA Limo Global	TCP 49257 B certificate Active	None
Adrian Limousines LLC	TCP 31819 B certificate Active	None
All Starz Limousine, Inc	TCP 16883 B certificate Active	None
Apple Towncar Service	TCP 30397 B certificate Active	None
Best VIP Tours Inc	TCP 12933 P permit Active	None
Capital Transportation Services LLC	TCP 37767 B certificate Revoked	None
Excellence Limo	TCP 36646 B certificate Active	None
Gold Coast Town Car Services	TCP 29884 A certificate Active	None
In Style Transportation	TCP 33451 A certificate Active	None
MDK Limo Service LLC	TCP 32130 P permit Active	None
Omar Darraj	TCP 36646 B certificate Active	None
On Time Transportation NW	Operating Without Authority	None
Royal Luxury Tours & Transportation Inc	TCP 39278 B certificate Active	None
S&S Chauffeured Services	TCP 40010 B certificate Active	None
SF City Tours Inc	TCP 32276 A certificate Revoked	None
Silk Lane Transport LLC	TCP 41834 A certificate Active	None

According to the TCP database, three carriers did not hold valid TCP authority or had their authority revoked during service period [Attachment 4]. The waybill data received shows that these carriers provided services during the revoked status or without valid TCP authority [Attachment 5].

Table 2
Subcarriers without TCP Authority

Subcarrier	TCP Status	Service period
Capital Transportation Services LLC (TCP-37767)	Revoked on 3/9/2020	10/07/2025-10/08/2025 (two trips)
On Time Transportation NW	Operating Without Authority	08/15/2025 (one trip)
SF City Tours Inc (TCP-32276)	Revoked on 07/26/2025	09/09/2025-10/25/2025 (three trips)

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 as to those matters, I believe to be true.

Executed on March 18, 2026
In San Francisco, California

/s/ Sheela Dawadi
Sheela Dawadi
Public Utilities Regulatory Analyst II

List of Attachments

Attachment 1: Data Request Letter (Sent on October 31, 2025)

Attachment 2: Email (Received on November 13, 2025)

Attachment 3: Rental Agreement Terms

Attachment 4: Sub-carriers with Revoked Authority

Attachment 5: Waybill Records (Received on November 13, 2025)

Attachment 1
Data Request Letter (Sent on October 31, 2025)

STATE OF CALIFORNIA

GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA. 94102-3298



October 31, 2025,

TCP: 33731 B (Active)

Case No.: CSE-000751

Cosand Partners LLC
DBA: Elite Black Car Services

[REDACTED]
[REDACTED]

Subject: Data Request – 01

Due date: November 17, 2025

Dear Chris Cosand,

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 TEB is requesting a review of the Charter-Party intrastate transportation records for Cosand Partners LLC. Failure to provide access to records is a misdemeanor punishable by a maximum of \$5,000, 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 Sheela Dawadi at sheela.dawadi@cpuc.ca.gov by November 17, 2025.

1. Your current personal liability and property damage insurance policy showing schedule of vehicles and drivers insured,
2. Your current workers' compensation insurance policy,
3. List of all current sub-carriers and agreements,
4. Current service agreement with your drug consortium and a list of all drivers enrolled showing dates added and/or deleted,
5. Vehicle accident records including insurance loss runs showing dates of accidents and drivers' names for the last five (5) years,
6. Other Fictitious Business Names (FBN) doing business as (dba),
7. Please provide waybills for all interstate TCP trips completed from July 1, 2025, to September 30, 2025, as documented on waybills per GO 157-E, Part 3.0,
8. All pre-employment and random drug test results for all your drivers within the last six (6) months and
9. Waybills for all intrastate TCP transportation, including transportation performed as Cosand Partners LLC for the past three months.

TEB 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 e-mail sheela.dawadi@cpuc.ca.gov.

Sincerely,

Sheela Dawadi


Sheela Dawadi
Public Utilities Regulatory Analyst II
California Public Utilities Commission
Consumer Protection and Enforcement Division
Transportation Enforcement Branch
Email: sheela.dawadi@cpuc.ca.gov







cc: Lana Tran, Program and Project Supervisor

Attachment 2


Email (Received on November 13, 2025)



[EXTERNAL] Waybills

 To Dawad, Sheela

  Reply  Reply All  Forward  

Thu 11/13/2025 10:21 AM

 You replied to this message on 11/13/2025 12:48 PM.
If there are problems with how this message is displayed, click here to view it in a web browser.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

 Reservations_by_Affiliate_Summary.xlsx 52 KB  DBA.pdf 2 MB

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 Sheela,

We do not perform any interstate trips as we are only licensed in the state of CA. We farm out business to partners in other states. All our partners are listed on the spreadsheet as well. Please see the report attached for intrastate and also the DBA document.

Also, we do not have any formal or signed agreements with our partners. We have an affiliate agreement that goes out to all partners on all confirmations. Let me if you would like us to provide this.

Sincerely,

Attachment 3

Rental Agreement Terms

THESE TERMS ARE A LEGAL AND BINDING AGREEMENT BETWEEN YOU AND our company governing your use of the services offered by Elite Black Car Services, (EBCS). Please review the terms fully before accepting our business. By accepting this farm-in ride, you agree to be bound by these terms. It is your responsibility to review these terms regularly.

Communication: Please call our text our office at [REDACTED] for any and all information needed once you have accepted the trip or email us directly [REDACTED]

Affiliate Instructions: Always represent Elite Black Car Services. Do not offer your own companies business cards or receipts. No vehicle substitutions unless authorized by our office and please do not double-farm this trip; it is a requirement that you use your own in-house fleet and drivers

Driver Info: Please call text or email our dispatch when you have assigned the driver and vehicle with their name and direct cell number

Driver Attire: Drivers are required to be in an all-black suit, with a pressed shirt and tie and newer-looking black shoes

Driver Eitquette: Drivers are never to discuss or explain any billing matter whatsoever with clients in the field. This includes tips/gratuity, hourly charges, overtime, and wait time. Any questions in regard to charges for the trip should be directed to our main office at [REDACTED]

Refunds/Deposits: By accepting reservations from Elite Black Car Services, you agree to refund any and all monies charged by you to reserve vehicles in the event the trip is cancelled 24 hours prior to scheduled pickup

Be safe and thank you for your help

Sincerely,

[REDACTED]

Attachment 4 Revoked Authority

PSG0037767 - Capital Transportation Service LLC

CAPITAL TRANSP...
0002766... v x

Contract

00027660

Account Name
[CAPITAL TRANSPORTATION SERVICE LLC](#)

Status
Revoked

Contract Start Date

Contract End Date
3/12/2021

Contract Term (months)

✓

✓

✓

Revoked

Suspended

Expired

Details
Suspension/Revocation List
Audit Log
Related

Contract Name	TCP B CERTIFICATE
Contract Start Date	
Status	Revoked
Contract Term (months)	
Contract Owner	CPUC System User
Product i	TCP B CERTIFICATE
Case	00018407
Valid for Renew? i	
Valid For Reinstatement Suspension i	
Extension Reason i	
Modified Expired Date i	
Modified Suspended Date i	
Voluntary Suspension End Date	

Account Name	CAPITAL TRANSPORTATION SERVICE LLC
Contract End Date	3/12/2021
Authority Status Reason i	Failure to pay or report quarterly user fees (PUCTRA)
Contract Number	00027660
Transferred i	
Price Book	
Valid For Refile	✓
Valid For Reinstatement Revocation i	
Valid For Transfer i	
Reason Code i	
Modified Revoked Date i	3/9/2020 6:31 AM
Owner Expiration Notice	
Is Revoked Within 90 days?	

PSG0032276 - SF City Tours Inc

SF CITY TOURS I...
0003429... v x
00276507 ... v x

Account Name

Account Name
[SF CITY TOURS INC](#)

Status
Revoked

Contract Start Date
3/7/2023

Contract End Date
3/7/2026

Contract Term (months)
36

✓

✓

✓

Revoked

Suspended

Expired

Details
Suspension/Revocation List
Audit Log
Related

Contract Name	TCP A CERTIFICATE
Contract Start Date	3/7/2023
Status	Revoked
Contract Term (months)	36
Contract Owner	Generic User TCP
Product i	TCP A CERTIFICATE
Case	00276507
Valid for Renew? i	
Valid For Reinstatement Suspension i	
Extension Reason i	
Modified Expired Date i	
Modified Suspended Date i	4/27/2025 5:07 AM
Voluntary Suspension End Date	
PSG Account Name	PSG0032276 - SF CITY TOURS INC

Account Name	SF CITY TOURS INC
Contract End Date	3/7/2026
Authority Status Reason i	Failure to maintain workers' compensation insurance
Contract Number	00034290
Transferred i	
Price Book	
Valid For Refile	✓
Valid For Reinstatement Revocation i	
Valid For Transfer i	
Reason Code i	
Modified Revoked Date i	7/26/2025 5:30 AM
Owner Expiration Notice	
Is Revoked Within 90 days?	

