



Public Utilities Commission  
STATE OF CALIFORNIA

CITATION FOR VIOLATION  
OF PUBLIC UTILITIES CODE

To: Rafo Investment Inc.

[REDACTED]

[REDACTED]

[REDACTED]

File: TCP 36213-B

Date: May 28, 2026

Citation #: T.2026-05-010

Case #: CSE-770

**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. The violations occurred on June 5, June 6, June 11, June 28, July 17, and July 22, 2025.

1. Failed to keep the equipment statement current in violation of Pub. Util. Code Sections 5381, 5411, and General Order 157-E, Part 4.01 [2 counts].
2. Failed to include pertinent information on waybills in violation of Pub. Util. Code section 5381.5 and G.O. 157-E, Part 3.01 [6 counts].

**STATEMENT OF FACTS**

The attached investigation report documents the above violations. It 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 June 18, 2026. By way of such an answer, you may either:

- (1) Pay a fine of \$5,000 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 June 18, 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.

*Shirley Lei*

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Shirley Lei, Program Project Supervisor  
Consumer Protection and Enforcement Division  
Transportation Enforcement Branch  
Telephone number (415) 231-9111  
E-mail address [shirley.lei@cpuc.ca.gov](mailto:shirley.lei@cpuc.ca.gov)

Attachments



Public Utilities Commission

STATE OF CALIFORNIA

**CITATION COMPLIANCE AGREEMENT**

File No.: TCP 36213-B  
Citation #: T.2026-05-010  
Date: May 28, 2026  
Case #: CSE-770

I (we) hereby agree to comply with this citation dated May 28, 2026, and herewith pay the fine of \$5000.

Rafo Investment Inc.

[Redacted Signature]  
[Redacted Title]

\_\_\_\_\_  
(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](mailto:FiscalOffice-.TECitations@cpuc.ca.gov).

**INVESTIGATION REPORT**

**CARRIER:** Rafo Investment, Inc., DBA SD Luxury Limos  
A California Corporation, Entity Number 3854455

**OFFICERS:** [REDACTED]

**AUTHORITY:** TCP 36213-B (Active)

**MAILING ADDRESS:** [REDACTED]

**BUSINESS ADDRESS:** [REDACTED]

**PHONE/EMAIL:** [REDACTED]

**VEHICLES:** 1

**EMPLOYEE-DRIVERS:** 1 (Inactive)

**PL&PD INSURANCE:** Texas Insurance Company  
Policy Number: [REDACTED]  
Effective Date: 12/11/2025

**WORKERS' COMPENSATION INSURANCE:** State Compensation Insurance Fund  
Policy Number: [REDACTED]  
Effective Date: 6/12/2023

**DRUG CONSORTIUM:** Substance Abuse Evaluation Resource Center (SAERC)

## INTRODUCTION

On November 21, 2025, I was assigned to investigate the operations and practices of Rafo Investment, Inc. DBA SD Luxury Limos (herein referred to as Rafo Investment). This assignment came after the Transportation Safety Complaint (TSC) staff received a complaint from a former employee-driver alleging that Rafo Investment had used drivers without proper certification and that drivers were not enrolled in a drug testing program. This complaint was received by TSC staff on November 21, 2025 [**Attachment 1**].

## HISTORY OF ENFORCEMENT

- **Prior Case (CSE-0331):** On April 28, 2025, TEB Enforcement Analyst, Kingsley Melton, served Rafo Investment with a \$6,000 citation #T.25.04-008, for the following violations: 1 count of equipment list [**Attachment 2**].

- **Prior Case (PSG-5816):** On April 27, 2023, TEB Enforcement Analyst, Destiny Graham, served Rafo Investment with a \$6,000 citation #T.23-04-002 for the following violations: 1 count of equipment list, 9 counts of waybill compliance, 2 counts of PL&PD noncompliance [**Attachment 3**].

- **Prior Case (PSG-4964):** On October 14, 2019, TEB Enforcement Analyst Steve Esguerra served Rafo Investment with a \$3,000 citation #F-5588 [**Attachment 3**] for the following violations: 5 counts failed to enroll employees in EPN Program, 4 counts failed to enroll drivers in Controlled Substance and Alcohol Testing Certification Program, 6 counts engaged with drivers without proper endorsement and medical certificates, 1 count failed to provide pertinent waybill information [**Attachment 4**].

- **Prior Case (PSG-4758):** On August 30, 2018, TEB Enforcement Analyst, Steve Esguerra, served Rafo Investment with a \$12,000 citation #F-5465 for the following violations: 61 counts operated as charter-party after suspension and/or revocation of its operating authority, 7 counts engaged with employee-drivers without evidence of workers' compensation, 7 counts failed to enroll employee-drivers in the EPN program, 3 counts failed to enroll employee-drivers

in the Controlled Substance and Alcohol Testing Certification Program, 1 count failed to provide records, 1 count failed to provide pertinent waybill information [**Attachment 5**].

## **VIOLATION**

I investigated Rafo Investment from November 14, 2025, to May 22, 2026. The investigation disclosed violations of the following provisions of the Public Utilities (Pub. Util.) Code and a Commission General Order (G.O.):

- **Failed to include pertinent information on the waybill in violation of Pub. Util. Code Section 5381 and G.O. 157-E, Part 3.01 [6 counts].**

On April 10, 2026, I sent Rafo Investment C.E.O. [REDACTED] a Data Request for all intrastate waybills from June 1, 2025, to July 31, 2025 [**Attachment 6**]. On April 23, 2026, I received an email from [REDACTED] with (6) waybills, (6/5/25, 6/6/25, 6/11/25, 6/28/25, 7/17/25, 7/22/25), and none containing the required license plate numbers [**Attachment 7**].

- **Failed to keep the equipment statement current in violation of Pub. Util. Code Sections 5381, 5411, and G.O. 157-E, Part 4.01 [2 counts].**

On May 5, 2026, I sent [REDACTED] an email requesting the license plate numbers for the two vehicles described on the waybills provided [**Attachment 7**]. On May 13, 2026, I received an email from [REDACTED] that provided license plates numbers [REDACTED] and [REDACTED] [**Attachment 8**]. A review of the waybill revealed that Rafo Investment operated with two vehicles not on file with the Commission during June 1, 2025, to July 31, 2025.

## **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 May 28, 2026, at Sacramento, California.

*Kingsley L. Melton*

Kingsley Melton, Public Utilities Regulatory Analyst

## **List of Attachments**

- **Attachment 1** – Transportation Safety Complaint
- **Attachment 2** – Prior Citation: April 28, 2025
- **Attachment 3** – Prior Citation: April 27, 2023
- **Attachment 4** – Prior Citation: October 14, 2019
- **Attachment 5** – Prior Citation: August 30, 2018
- **Attachment 6** – Waybill Request
- **Attachment 7** – Waybills (6)
- **Attachment 8** – Email from [REDACTED]: 5/13/2026

**Attachment 1**  
**Transportation Safety Complaint**

State of California

**Public Utilities Commission**  
News and Outreach Office – Consumers Affair Branch  
505 Van Ness Avenue  
San Francisco, CA 94102  
Fax: (415) 703-1158 Tel: (800) 649-7570 E-Mail: [Consumer-Affairs@cpuc.ca.gov](mailto:Consumer-Affairs@cpuc.ca.gov)  
**Passenger Complaint Form – Intrastate Transportation Only**

How Did the Company Initially Contact You? \_\_\_\_\_

I was hired to drive for the company on June 12, 2025

Date and time transportation was provided: June 12, 2025 - Sept 23, 2025

Origin and Destination of your trip: the Del Mar Fair between June 12, 2025 - July 6, 2025

The City of Chula Vista from 3rd ave to the Gaylord Resort at the Chula Vista Bayfront between July 8 2025 - Sept 23 2025

Name of driver and/or number of vehicle, if known: \_\_\_\_\_

Name(s) of other contact persons with company: \_\_\_\_\_

\_\_\_\_\_ (driving commercial vehicle without class b license). Two other drivers do not have class b licenses

Briefly Explain Your Problem: While employed with San Diego Luxury Limos, there where several shuttle drivers hired without a class b to operate commercial vans.

San Diego Luxury Limos was contracted by City of Chula Vista and MTS

to service the city of Chula Vista and the Gaylord resort at the Chula Vista Bayfront.

San Diego Luxury Limos allowed my husband, \_\_\_\_\_ to drive these commercial vans on

Sept 12 - Sept 14 2025 and again on Sept 21 2025 before he filed out an application on Sept 22nd \_\_\_\_\_ did not

have a background check, drug tested, verified on Clearinghouse website per regulation,

does not have a medical examiners certificate nor does he have a class b license to drive commercial vehicles.

San Diego Luxury Limos is operating under unsafe conditions and is a liability to

the city of Chula Vista passengers and the guest and employees at \_\_\_\_\_ They are also

operating these shuttles at MTS Trolley Stations that put passengers safety at risk.

I have a class b license however i too was not drug tested, verified on Clearinghouse or had a background check before operating shuttles.

**Attachment 2**  
**Citation T.25-04-008**



**Public Utilities Commission**  
**STATE OF CALIFORNIA**

**CITATION FOR VIOLATION**  
**OF PUBLIC UTILITIES CODE**

To: Rafo Investment Inc.  
[REDACTED]

File: TCP 36213-B  
Date: April 28, 2025  
Citation: T.2025-04-008  
Case: CSE-331

**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. This violation occurred on October 26, 2024.

1. Failed to keep the equipment statement current in violation of Pub. Util. Code Sections 5381, 5411, and General Order 157-E, Part 4.01 [1 count].

**STATEMENT OF FACTS**

The attached investigation report documents the above violations. It 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 May 20, 2025. By way of such an answer, you may either:

- (1) Pay a fine of \$5,000 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 May 20, 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.

*Rahmon Momoh*

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Rahmon Momoh, Program Project Supervisor  
Consumer Protection and Enforcement Division  
Transportation Enforcement Branch  
Telephone number (415) 703-1725  
E-mail address [rahmon.momoh@cpuc.ca.gov](mailto:rahmon.momoh@cpuc.ca.gov)

Attachments

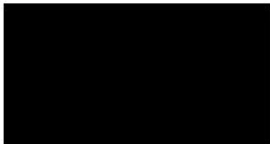
**Attachment 3**  
**Citation T.23-04-002**



Public Utilities Commission  
STATE OF CALIFORNIA

CITATION FOR VIOLATION  
OF PUBLIC UTILITIES CODE

To: Rafo Investment Inc



File: TCP 36213

Date: April 27, 2023

Citation #: T.23-04-002

Case #: PSG-5816

**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 from October 1, 2022, through November 20, 2022.

- (1) Failed to keep the equipment statement current in violation of Pub. Util. Code Sections 5392 and G.O. 157-E Part 4.01 [1 count];
- (2) Failed to include the required information on the waybills in violation of Pub. Util. Code section 5381.5, and G.O. 157-E, Part 3.01 [9 counts];
- (3) Failed to obtain the minimum required Public Liability and Property Damage (PL&PD) insurance coverage or vehicles with 16 passengers or more in violation of PUC Sections 5387(a)(3), 5391, and GO 115-G [2 counts].

### STATEMENT OF FACTS

The above violations are documented in the attached Investigation Report, which consists of 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 May 22, 2023. By way of such answer, you may either:

- (1) Pay a fine of \$6,000 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 May 22, 2023, 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.

*Rahmon Momoh*

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*Rahmon Momoh*  
Consumer Protection and Enforcement Division  
Transportation Enforcement Branch  
Telephone number: (415) 703-1725  
E-mail address: [Rahmon.Momoh@cpuc.ca.gov](mailto:Rahmon.Momoh@cpuc.ca.gov)

**Attachment 4  
Citation F-5588**



**Public Utilities Commission**

STATE OF CALIFORNIA

**CITATION FOR VIOLATION  
OF PUBLIC UTILITIES CODE**

To: Rafo Investment, Inc.  
dba SD Luxury Limos



File: TCP 36213-B

Date: October 14, 2019

Citation #: F - 5588

Case #: PSG - 4964

**VIOLATIONS**

You are hereby cited with having violated sections of the Public Utilities Code (Pub. Util. Code) and General Order (G.O.) as described below. These violations occurred during the period December 1, 2018 through March 31, 2019:

- (1) Failed to enroll five (5) employee-drivers in the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) Program in violation of Pub. Util. Code Section 5374(a)(1)(D), GO 157-E, Part 5.02 and the California Vehicle Code (CVC) Section 1808.1 [5 counts];
- (2) Failed to enroll four (4) employee-drivers in the Controlled Substance and Alcohol Testing Certification Program for Pre-Employment Testing in violation of Pub. Util. Code Section 5374 (a)(1)(I) and G.O. 157-E, Part 10 [4 counts];
- (3) Engaged six (6) employee-drivers without being licensed with the proper endorsement and medical certificates in violation of Pub. Util. Section 5387(b)(c)(1)(E), G.O. 157 E, Part 5.01 and CVC Sections 15250 and 15278 (6 counts); and
- (4) Failed to include pertinent information on the waybills in violation of Pub. Util. Code Section 5381 and G.O. 157-E, Part 3.01 [1 count].

**STATEMENT OF FACTS**

The above violations are documented in the attached investigator's summary report, which consists of carrier's records and substantiating documents obtained from other sources.

CIT-LIC

**RESPONSE**

You are hereby called upon to answer this citation on or before November 4, 2019  
By way of such answer you may either:

- (1) Pay a fine of \$3,000 pursuant to Pub. Util. Code Section 5378. (Submit a cashier check or money order payable to California Public Utilities Commission using the attached *Citation Compliance Agreement* form. 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) 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 within the 20 calendar days, you will be in default of the citation and will have forfeited your right to appeal the citation. In addition, your operating authority will be immediately suspended and subsequently revoked, pursuant to Resolution ALJ-187. The Commission may also take action through a civil or criminal proceeding to recover any unpaid fine and ensure compliance with applicable statutes and Commission orders.

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Haydee Clarke  
Supervising Transportation Representative, Badge #8  
Transportation Enforcement Branch - South  
Consumer Protection and Enforcement Division

Attachments

CIT-LIC

**Attachment 5  
Citation F-5465**



**Public Utilities Commission**

STATE OF CALIFORNIA

**CITATION FOR VIOLATION  
OF PUBLIC UTILITIES CODE**

To: Rafo Investment, Inc.  
dba SD Luxury Limos  
[REDACTED]

File: TCP 36213 B

Date: August 30, 2018

Citation #: F - 5465

Case #: PSG - 4758

**VIOLATIONS**

You are hereby cited with having violated sections of the Public Utilities Code (Pub. Util. Code) and General Order (G.O.) as described below. These violations occurred during the period April 1, 2018 through June 30, 2018:

- (1) Operated as a charter-party carrier after suspension and/or revocation of its operating authority in violation of Pub. Util. Code Section 5379 [61 counts];
- (2) Engaged at least seven (7) employee-drivers without evidence of workers' compensation insurance in effect and on file with the Commission in violation of Pub. Util. Code Section 5378.1 [7 counts];
- (3) Failed to enroll seven (7) employee-drivers in the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) Program in violation of Pub. Util. Code Sections 5381, 5374(a)(1)(D), GO 157-D Part 5.02 and the California Vehicle Code (CVC) Section 1808.1 [7 counts];
- (4) Failed to enroll three (3) employee-drivers in the Controlled Substance and Alcohol Testing Certification Program for Pre-Employment Testing in violation of Pub. Util. Code Section 5374 (a)(1)(I) and G.O. 157-D, Part 10 [3 counts];
- (5) Failed to provide access to records in violation of Pub. Util. Sections 5381 and 5389 and G.O. 157-D Part 6.01 [1 count]; and
- (6) Failed to include pertinent information on the waybills, in violation of Pub. Util. Code Section 5381 and G.O. 157-D, Part 3.01 [1 count].

CIT-LIC

**STATEMENT OF FACTS**

The above violations are documented in the attached investigator's summary report, which consists of carrier's records and substantiating documents obtained from other sources.

**RESPONSE**

You are hereby called upon to answer this citation on or before September 20, 2018.

By way of such answer you may either:

(1) Pay a fine of \$12,000 pursuant to Pub. Util. Code Section 5378, plus provide copy of business income tax returns for years 2015, 2016 and 2017. (Submit a cashier check or money order payable to California Public Utilities Commission using the attached *Citation Compliance Agreement* form. 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) 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 within the 20 calendar days, you will be in default of the citation and will have forfeited your right to appeal the citation. In addition, your operating authority will be immediately suspended and subsequently revoked, pursuant to Resolution ALJ-187. The Commission may also take action through a civil or criminal proceeding to recover any unpaid fine and ensure compliance with applicable statutes and Commission orders.

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Haydee Clarke  
Senior Transportation Representative, Badge #10  
Transportation Enforcement Section  
Consumer Protection and Enforcement Division

Attachments

CIT-LIC

## Attachment 6 Waybill Request

STATE OF CALIFORNIA

GAVIN NEWSOM, *Governor*

### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 10, 2026

TCP: 36213

Case No.: CSE-770

[REDACTED]  
Rafo Investment, Inc.  
[REDACTED]

Subject: Data Request

Dear [REDACTED]

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 Rafo Investment, Inc. 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 Kingsley Melton at [Kingsley.melton@cpuc.ca.gov](mailto:Kingsley.melton@cpuc.ca.gov) by April 17, 2026.

1. Waybills for all intrastate TCP transportation, including transportation performed as SD Luxury Limos for 6/01/2025 to 7/31/2025.

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 call me at 916-698-8393 or e-mail **Kingsley.melton@cpuc.ca.gov**.

Sincerely,

Kingsley L. Melton  
Enforcement Analyst, Transportation Enforcement Branch  
California Public Utilities Commission  
Consumer Protection and Enforcement Division  
Transportation Enforcement Branch  
Email: Kingsley.melton@cpuc.ca.gov  
Telephone: 916-698-8393

cc: Shirley Lei, Project Program Manager

## Attachment 7 Waybills (6)

4/22/26, 5:20 PM

Trip Sheet

*Luxury* <sup>SD</sup> *Limos*  
TCP # 36213 - B

**Pick-up Date:** 06/05/2025 - Thu  
**Pick-up Time:** 09:25 PM  
**New DO Time:** 10:15 PM  
**Reservation#** 33096

<b>Bill To:</b> [REDACTED]	<b>Primary Passenger:</b> [REDACTED]	<b>Booked On:</b> 04/10/2025 10:07 AM <b>Arr. By:</b> Not Specified <b>PO/Client #:</b> N/A
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# of Pax	Vehicle Type	Car(s)	Driver(s)
2	Luxury Sedan (SED)	Cadillac X... (Cad XTS) (00)	Gianni

Passenger & Routing Information	
<b>Passenger:</b> [REDACTED]	
<b>Phone:</b> [REDACTED]	
<b>Alt Contact: home# - Alt Phone:</b> [REDACTED]	
<b>PU: -- : SAN - San Diego International Airport / HA - Hawaiian Airlines, From/To: OGG - Kahului Airport , Term/Gate: 2/51, Flt# 58, ETA/ETD: 21:13:00</b>	
<b>DO: -- : [REDACTED] Carlsbad, CA 92011 (United States of America)</b>	

Pmt Type	Status
Not Specified	Paid

Charges & Fees	
6/5 1-way 1 x 135.00	135.00
Gratuity 20.00%	27.00
<b>Total Due (USD):</b>	<b>162.00</b>
<b>Payments/Deposits (USD):</b>	<b>162.00</b>
<b>Total Outstanding (USD):</b>	<b>0.00</b>

Notes/Comments
Trip Notes: keep track of flight!
Special Requests:

Reservation Agreement
< NO AGREEMENT PROVIDED >

Gratuity(\$): \_\_\_\_\_   
 New Total(\$): \_\_\_\_\_   
 Signature: \_\_\_\_\_   
 Date: \_\_\_\_\_

G-out \_\_\_\_\_ Arr Tm \_\_\_\_\_ Pax Load \_\_\_\_\_ Pax Drop \_\_\_\_\_ G-in \_\_\_\_\_ Mls-out \_\_\_\_\_ Mls-in \_\_\_\_\_

# Luxury SD Limos

TCP # 36213 - B

Pick-up Date: 06/06/2025 - Fri  
Pick-up Time: 01:45 PM  
New DO Time: 04:00 PM  
Reservation# 33381 TRF

Bill To: [REDACTED]	Primary Passenger: [REDACTED]	Booked On: 05/27/2025 10:39 AM
		Arr. By: Not Specified
		PO/Client #: N/A

# of Pax	Vehicle Type	Car(s)	Driver(s)
1	Luxury Sedan (SED)	Cadillac X... (Cad XTS) (00)	Nawar

Passenger & Routing Information
Passenger: [REDACTED] Phone: [REDACTED]
PU: -- : SAN - San Diego International Airport / WN - Southwest Airlines, From/To: RNO - Reno/Tahoe International Airport, Term/Gate: 1/5, Flt# 4357, ETA/ETD: 13:28:00
DO: -- : [REDACTED] Fremecula, CA 92592 (United States of America)

Pmt Type	Status
Not Specified	Paid

Charges & Fees	
Hourly Rate 1 x 200.00	200.00
Gratuity 20.00%	40.00
Fuel Surch 10.00%	20.00
<b>Total Due (USD):</b>	<b>260.00</b>
<b>Payments/Deposits (USD):</b>	<b>260.00</b>
<b>Total Outstanding (USD):</b>	<b>0.00</b>

Notes/Comments
Trip Notes: - all fees included
Special Requests:

Reservation Agreement
< NO AGREEMENT PROVIDED >

Gratuity(\$): \_\_\_\_\_ New Total(\$): \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

G-out _____	Arr Tm _____	Pax Load _____	Pax Drop _____	G-in _____	Mls-out _____	Mls-in _____
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*Luxury* **SD** *Limos*  
 TCP # 36213 - B

**Pick-up Date:** 06/11/2025 - Wed  
**Pick-up Time:** 01:00 PM  
**Drop Off Time:** 03:30 PM  
**New DO Time:** 03:40 PM  
**Reservation#** 33092 TRF

<b>Bill To:</b> [REDACTED]	<b>Primary Passenger:</b> [REDACTED]	<b>Booked On:</b> 04/08/2025 08:27 PM <b>Arr. By:</b> Not Specified <b>PO/Client #:</b> N/A
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# of Pax	Vehicle Type	Car(s)	Driver(s)
15	G-Wagon Limo (G-WAGON)	Mercedes G... (G-Wagon) (000000)	Luis Bernal (619) 761-0026

Passenger & Routing Information	
Occasion: 5th grade promotion	
Passenger: [REDACTED] Phone: [REDACTED]	
PU: --	[REDACTED] Carlsbad, CA 92009 (United States of America)
ST: --	TBD - as directed , CA
DO: --	[REDACTED] Carlsbad, CA 92011 (United States of America)

Pmt Type	Status
CC ** 3957	Paid

Charges & Fees	
All Inclusive Package	928.00
Total Due (USD):	928.00
Payments/Deposits (USD):	928.00
Total Outstanding (USD):	0.00

Notes/Comments
Trip Notes: complimentary cider, water and ice
Special Requests:

Reservation Agreement
< NO AGREEMENT PROVIDED >

Gratuity(\$): \_\_\_\_\_ New Total(\$): \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

G-out _____	Arr Tm _____	Pax Load _____	Pax Drop _____	G-in _____	Mls-out _____	Mls-in _____
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# Luxury SD Limos

TCP # 36213 - B

**Pick-up Date:** 06/28/2025 - Sat  
**Pick-up Time:** 02:00 PM  
**Drop Off Time:** 06:00 PM  
**New DO Time:** 05:40 PM  
**Reservation#** 32662 HRL

<b>Bill To:</b> [REDACTED]	<b>Primary Passenger:</b> [REDACTED]	<b>Booked On:</b> 01/04/2025 03:43 PM <b>Arr. By:</b> Not Specified <b>PO/Client #:</b> N/A
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# of Pax	Vehicle Type	Car(s)	Driver(s)
15	G-Wagon Limo (G-WAGON)	Mercedes G... (G-Wagon) (000000)	Nawar

Passenger & Routing Information	
Occasion: Quinceañera - Quinceañera	
Passenger: [REDACTED] Phone: [REDACTED]	
PU: --	: [REDACTED] National City, CA 91950 (United States of America)
Notes: [REDACTED]	
ST: --	: Inspiration Point Way San Diego, CA (United States of America)
ST: --	: St. Jude's Shrine 1129 S 38th St San Diego, CA 92113 (United States of America)
DO: --	: Factory of Dreams 261 3rd Ave Chula Vista, CA 91910 (United States of America)

Pmt Type	Status
Not Specified	Paid

Charges & Fees	
Hourly Rate 4 x 300.00	1200.00
Gratuity 18.00%	216.00
Fuel Surch 10.00%	120.00
<b>Total Due (USD):</b>	<b>1536.00</b>
<b>Payments/Deposits (USD):</b>	<b>1536.00</b>
<b>Total Outstanding (USD):</b>	<b>0.00</b>

Notes/Comments
Trip Notes: cider, water and ice
Special Requests:

Reservation Agreement
< NO AGREEMENT PROVIDED >

Gratuity(\$): \_\_\_\_\_ New Total(\$): \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

G-out _____	Arr Tm _____	Pax Load _____	Pax Drop _____	G-in _____	Mls-out _____	Mls-in _____
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# Luxury <sup>SD</sup> Limos

TCP # 36213 - B

**Pick-up Date:** 07/17/2025 - Thu  
**Pick-up Time:** 11:30 AM  
**Drop Off Time:** 07:30 PM  
**New DO Time:** 07:00 PM  
**Reservation#** 33510 HRL

<b>Bill To:</b> [REDACTED]	<b>Primary Passenger:</b> [REDACTED]	<b>Booked On:</b> 07/08/2025 01:20 PM <b>Arr. By:</b> Not Specified <b>PO/Client #:</b> N/A
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<b># of Pax</b> 3	<b>Vehicle Type</b> Luxury Sedan (SED)	<b>Car(s)</b> Cadillac X... (Cad XTS) (00)	<b>Driver(s)</b> Nawar
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<b>Passenger &amp; Routing Information</b>	
Occasion: Funeral	
Passenger: [REDACTED] Phone: [REDACTED]	
PU: --	[REDACTED] Chula Vista, CA 91915 (United States of America)
Notes:	
ST: --	Pacific Beach - La Jolla Chapel 4710 Cass St San Diego, CA 92109 (United States of America)
ST: --	El Camino Memorial - Sorrento Valley & Memorial Park 5600 Carroll Canyon Rd San Diego, CA 92121 (United States of America)
DO: --	[REDACTED] Chula Vista, CA 91915 (United States of America)
Notes:	

<b>Pmt Type</b> Not Specified	<b>Status</b> Paid
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Charges & Fees	
Hourly Rate 8 x 90.00	720.00
Gratuity 20.00%	144.00
Fuel Surch 10.00%	72.00
<b>Total Due (USD):</b>	<b>936.00</b>
<b>Payments/Deposits (USD):</b>	<b>936.00</b>
<b>Total Outstanding (USD):</b>	<b>0.00</b>

<b>Notes/Comments</b>
Trip Notes: - all fees included in package
<b>Special Requests:</b>

<b>Reservation Agreement</b>
< NO AGREEMENT PROVIDED >

Gratuity(\$): \_\_\_\_\_ New Total(\$): \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

G-out	Arr Tm	Pax Load	Pax Drop	G-in	Mls-out	Mls-in
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*Luxury* **SD** *Limos*  
 TCP # 36213 - B

**Pick-up Date:** 07/22/2025 - Tue  
**Pick-up Time:** 11:55 PM  
**New DO Time:** 02:40 AM  
**Reservation#** 33533

<b>Bill To:</b> [Redacted]	<b>Primary Passenger:</b> [Redacted]	<b>Booked On:</b> 07/11/2025 10:38 AM <b>Arr. By:</b> Not Specified <b>PO/Client #:</b> N/A
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<b># of Pax</b> 6	<b>Vehicle Type</b> G-Wagon Limo (G-WAGON)	<b>Car(s)</b> Mercedes G... (G-Wagon) (000000)	<b>Driver(s)</b> Luis Bernal (619) 761-0026
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**Passenger & Routing Information**

**Passenger:** [Redacted]  
**Phone:** [Redacted]  
**Add't Pax:** [Redacted]

**PU: -- :** LAX - Los Angeles International Airport / UA - United Airlines, From/To: HNL - Honolulu International Airport, Term/Gate: 7/71B, Flt# 1636, ETA/ETD: 00:11:00

**DO: -- :** [Redacted] Valley Center, CA 92082 (United States of America)

<b>Pmt Type</b> Amex ** 1009	<b>Status</b> Paid
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Charges & Fees	
Base Hr	943.00
Gratuity 20.00%	188.60
Fuel Surch 10.00%	94.30
<b>Total Due (USD):</b>	1225.90
<b>Payments/Deposits (USD):</b>	1225.90
<b>Total Outstanding (USD):</b>	0.00

**Notes/Comments**

[Redacted]

**Special Requests:**

**Reservation Agreement**

< NO AGREEMENT PROVIDED >

Gratuity(\$): \_\_\_\_\_ New Total(\$): \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

G-out \_\_\_\_\_ Arr Tm \_\_\_\_\_ Pax Load \_\_\_\_\_ Pax Drop \_\_\_\_\_ G-in \_\_\_\_\_ Mls-out \_\_\_\_\_ Mls-in \_\_\_\_\_

**Attachment 8**  
Email from Dani Rafo: 5/13/2026

**From:** [REDACTED]  
**To:** [Melton, Kingsley](#)  
**Subject:** Re: [EXTERNAL] Re: Data Request- Rafo Investment Inc (Active) CSE 770  
**Date:** Wednesday, May 13, 2026 4:12:20 PM

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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.

Mr. Melton,

The license plate for the Mercedes G-wagon is **56554E4**  
The other vehicle (4 passenger sedan) has been sold. License # was **7GIU163**, but has probably changed with new owners.

Please let me know if this will suffice.

Regards,  
[REDACTED]

On Wednesday, May 13, 2026 at 02:15:48 PM PDT, Melton, Kingsley <kingsley.melton@cpuc.ca.gov> wrote:

Good afternoon, [REDACTED]

This is a final request to provide the license plate numbers for the two vehicles listed on the waybills provided. Please reply no later than this Friday, May 15, 2026.

Thank you,

**Kingsley L. Melton**  
Public Utilities Regulatory Analyst

Transportation Enforcement Branch  
Consumer Protection and Enforcement Division  
Mobile: 916-698-8393  
[www.cpuc.ca.gov](http://www.cpuc.ca.gov) | [Facebook](#) | [Twitter](#) | [Instagram](#) | [YouTube](#)

**CALIFORNIA PUBLIC UTILITIES COMMISSION**



**Carrier:** Rafo Investment Inc.

**File:** TCP 36213-B

**Citation #:** T.2026-05-010

**Case #:** CSE-770

**Date:** May 28, 2026

**AUTO-PAY CREDIT OR DEBIT CARD AUTHORIZATION**

I (we), \_\_\_\_\_,  
doing business as Atcha Rao Boppudi hereby authorize the California Public Utilities  
Commission to deduct \$1,500 from my VISA or Mastercard in one  
installment, or each month, on the due date, until Citation T.2025-12-004 is paid in full.

Card Number \_\_\_\_\_ Expiration Date \_\_\_\_\_.

\_\_\_\_\_  
Cardholder Authorized Signature

\_\_\_\_\_  
Date

**Attachments:**

Photocopy of Credit or Debit Card  
Photocopy of Cardholder's Driver's License

## HOW TO FILE AN APPEAL OF A TRANSPORTATION CITATION

IF YOU WISH TO APPEAL THIS CITATION, YOU MUST DO SO WITHIN 20 CALENDAR DAYS OF THE DATE YOU RECEIVED THE CITATION.

**[There are two options to file your appeal, both options require you to use of the Appeal Form located at the link below:](#)**

### [Appeal Form](#)

**Option 1:** You may file your appeal electronically by following the instructions on the CPUC's Filing A Document Electronically (E-filing) webpage [E-File a Document \(ca.gov\)](#)

**Option 2:** You may file your appeal by sending six (6) paper copies addressed to CPUC's Docket office:

**California Public Utilities Commission  
Docket Office, 2<sup>nd</sup> Floor  
505 Van Ness Ave  
San Francisco, CA 94102**

### **[After Filing your appeal, you must also serve the Notice of Appeal:](#)**

To serve copies of the Notice of Appeal, you must attach a “**Certificate of Service for a Citation Appeal.**” In the Notice of Appeal, you must state why you are appealing the citation.

**To properly serve the Notice of Appeal, send the Notice of Appeal and any attachments by e-mail to the following recipients:**

1. **CPUC Docket Office**, ALJ\_Docket\_Office@cpuc.ca.gov
2. **Transportation Enforcement Inbox**, TEB\_Citation\_Appeals@cpuc.ca.gov
3. **Terra Curtis, Director CPED**, Terra.Curtis@cpuc.ca.gov
4. **Michelle Cooke, Chief Administrative Law Judge**, Michelle.Cooke@cpuc.ca.gov
5. **ALJ Division Appeals Coordinator**, ALJ\_Div\_Appeals\_Coordinator@cpuc.ca.gov

***Please note if you are appealing by the Paper Copy process you must also file the Notice of Appeal either by emailing as described above or mailing to the following:***

***Original plus six copies to:***

1. **Docket Office**, California Public Utilities Commission, Docket Office, 2nd Floor, 505 Van Ness Ave., San Francisco, CA 94102

**One Copy Each to:**

2. **Terra Curtis, Director**, Consumer Protection and Enforcement Division, California Public Utilities Commission, 505 Van Ness Ave., 2nd Floor, San Francisco, CA 94102
3. **Michelle Cooke, Chief Administrative Law Judge**, California Public Utilities Commission, Administrative Law Division, 505 Van Ness Ave., 5th Floor, San Francisco, CA 94102
4. **ALJ Division Appeals Coordinator**, California Public Utilities Commission, Administrative Law Division, 505 Van Ness Ave., 5th Floor, San Francisco, CA 94102
5. **Kenneth Bruno, Program Manager**, Consumer Protection and Enforcement Division, Transportation Enforcement Branch, 320 W. 4th Street Los Angeles, CA 90013

**[You may request an extension of time to file an appeal](#)**

You may request up to 30 days additional time to file an appeal. To ask for extra time, contact the Supervisor listed on the citation on or before the due date to seek a 30-day extension. A copy of the letter granting you an extension must be attached to your appeal.

The Citation Appeals Process can be found in Appendix A of CPUC Resolution ALJ-377, available through this link: [ALJ-377 Appendix A Citation Appeal Rules](#). The relevant Citation Appeals Process is also included in the packet you received along with the citation.

**[Paying the Citation and Availability of Payment Plans](#)**

If you do not want to file an appeal and agree to comply with the citation and pay the fine, sign the Citation Compliance Agreement. Contact the Supervisor listed on the citation before the due date to seek authorization for any payment plans as necessary.

**[Frequently Asked Questions](#)**

**WHAT HAPPENS IF I DON'T RESPOND?**

If you do not respond to the citation within the 20 calendar days, you will be in default of the citation, and will lose your right to appeal the citation. In addition, CPED will immediately suspend your operating authority. If you do not pay the citation amount or make a payment arrangement by 30 days after suspension of your operating authority, CPED will revoke your operating authority. Once we revoke your operating authority, we cannot reinstate it. Instead, first you must pay the citation fine, and then apply to the CPUC for **new** operating authority and pay a filing fee. The CPUC may also act through a civil or criminal proceeding to recover any unpaid fines and to ensure compliance with applicable statutes and CPUC orders.

**WHAT ARE MY RIGHTS?**

If you file a Notice of Appeal, the CPUC will set a **hearing date** for your appeal to be heard before an Administrative Law Judge (ALJ).

**[Hearing Venue:](#)**

Appeal hearings may be conducted by telephone, by WebEx, or in person. The date, time, and location (remote or in-person) for your hearing will be provided by the ALJ in advance of your hearing.

### **At the hearing:**

There are two different types of Hearing Procedures for an Appeal to be heard before a CPUC Administrative Law Judge.

### **Expedited Citation Appeal Procedure**

Resolution ALJ-377 provides for an expedited process for citations at or below the jurisdictional limit of the Small Claims Court in California as referenced in Public Utilities Code § 1702.1. This is currently \$10,000 for individuals and \$5,000 for corporations.

- Attorneys or representatives are not allowed to represent parties in the expedited process.
- No court reporters will be present, nor will a transcript be provided.
- You are entitled to have an interpreter present at the hearing to translate for you. The CPUC will provide the interpreter free of charge. To have an interpreter at the hearing, you must make a written request to the Chief Administrative Law Judge and to the Office of the Public Advisor (see contact information, on this form) no later than five business days before the date of your hearing.
- You may provide evidence and call witnesses to testify for you. If you will be providing evidence for the record of the hearing, you must provide that evidence to CPED no later than three days before the date of your hearing.
- A party who is subject to the Expedited Citation Appeal Procedure, may at any time before the swearing in of the first witness at the evidentiary hearing, request termination of the Expedited Citation Appeal Procedure, and that the matter be recalendared for hearing under the Commission's regular procedure for Citation Appeals. The Commission or the assigned Administrative Law Judge, when the public interest so requires, may at any time before the filing of a resolution addressing the Citation Appeal, terminate the Expedited Citation Appeal Procedure and recalendar the matter for hearing under the Commission's regular procedure for Citation Appeals.

### **Regular Procedure for Citation Appeals**

For cases exceeding the small claims threshold above, or when the appellant requests termination of the expedited procedure, the CPUC will use the regular procedure for citation appeals.

- You may have an attorney or someone else represent you, but you must pay for the attorney or other representative.
- You may ask for a transcript of the hearing, but you must pay the cost of the transcript.
- You are entitled to have an interpreter present at the hearing to translate for you. The CPUC will provide the interpreter, and you will not have to pay for the interpreter's service. To have an interpreter at the hearing, you must make a written request to the Acting Chief Administrative Law Judge and to the Office of the Public Advisor (see contact information, below) no later than five business days before the date of your hearing.

- You may provide evidence and call witnesses to testify for you. If you will be providing evidence for the record of the hearing, you must provide that evidence to CPED no later than three days before the date of your hearing.

### **WHERE CAN I GET HELP?**

The CPUC's **Public Advisor's Office** can help you file your appeal. The Public Advisor's Office cannot appear at the hearing with you or help you present your appeal but can help you understand the appeal process. The Public Advisor's Office can be reached at:

Telephone: 866-849-8390 or 415-703-2074

Email: [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov)

Mail: CPUC Public Advisor, 505 Van Ness Avenue, San Francisco, CA 94102

Administrative Law Judge Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102



## CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC) INSTRUCTIONS FOR FILING A NOTICE OF APPEAL AND CERTIFICATE OF SERVICE FOR A CITATION APPEAL

*Note: When filing a citation appeal, it is important to review both the specific Citation Program under which your citation has been issued and Resolution ALJ-377. The Pilot Rules enacted in Resolution ALJ-299<sup>1</sup> and these Revised Rules enacted in Resolution ALJ-377<sup>2</sup> require citation appeals after January 1, 2015 to be filed with the CPUC's Docket Office.<sup>3</sup> Appendix A of Resolution ALJ-377 lists the Citation Appellate and General Order Appellate Rules ("Citation Appellate Rules"). Appendix B of Resolution ALJ-377 describes the interaction between Resolution ALJ-377 and the individual Citation Programs in existence as of the adoption of Resolution ALJ-377. The cited entity initiating the appeal is referred to as an "appellant" under Resolution ALJ-377, Citation Appellate Rule 2.*

*Resolution ALJ-377 can be found at the following link and the citing authority should provide a copy of it when the citation is issued:*

*<https://docs.cpuc.ca.gov/ResolutionSearchForm.aspx>.*

*A copy of the Citation Program under which the citation is issued can be obtained from the CPUC Division issuing the citation.*

*It is useful to also refer to the CPUC's Rules of Practice and Procedure (P&P Rules), as they are referred to in Resolution ALJ-377. The P&P Rules can be found on the CPUC's webpage <http://www.cpuc.ca.gov/codelawsrules/>.*

*The requirements for formatting your document and how and where to file are generally set forth in P&P Rules 1.5, 1.6 and 1.13. There is no filing fee for filing the Notice of*

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<sup>1</sup> Effective as of January 1, 2015

<sup>2</sup> Effective as of July 1, 2020

<sup>3</sup> Rule 2 of the Citation Appellate Rules refers to a "Citation Program" as the "individual applicable statute, General Order or Resolution authorizing the issuance of a citation or authorizing the revocation of a license."

*Appeal. If you are filing your Notice of Appeal in hard copy, then submit an original and six exact copies of the document (including any attachments but not including the transmittal letter, if any.) (See P&P Rule 1.13(a)(2).) If you are filing electronically, please refer to the requirements in P&P Rule 1.13(b).*

*If you need general assistance with or have a question about filing the Notice of Appeal, contact the CPUC's Public Advisor's Office:*

The Public Advisor – CPUC  
505 Van Ness Avenue  
San Francisco, CA 94102  
(866) 849-8390 (toll free)  
[public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov)

**Specific Instructions for Using the Citation Appeal Forms:**

*Insert the following information into the blanks with the corresponding letters.*

**NOTICE OF APPEAL FORM**

- A. Insert the name of the person or entity filing the Notice of Appeal.  
(Citation Appellate Rule 3 and P&P Rule 1.6(b).)
- B. Insert the number of the citation being appealed and the date the citation was issued. (e.g., Citation Number 12345 issued on January 1, 2015).  
(Citation Appellate Rule 3.)
- C. Insert the amount of the citation. (Citation Appellate Rule 3.)
- D. Insert the name of the person or entity filing the Notice of Appeal.
- E. Insert the date of the citation that is appealed. (Citation Appellate Rule 5.)
- F. Insert the amount of the fine.

- G. Insert the date of any extension of time to file the appeal granted by CPED (if applicable).
- H. Insert the rationale for the appeal as specifically instructed in the Citation Program. If a Citation Program is silent on instructions for setting forth the rationale for the appeal, the Notice of Appeal must state the grounds for the appeal. The Notice of Appeal must also set forth additional items, if any, as required by the Citation Program. (Citation Appellate Rule 5.) If the Citation Program authorizes appellant to request an extension of time from a Division Director to file a Notice of Appeal, any extension received must be in writing and attached to the Notice of Appeal. (Citation Appellate Rules 4 and 5.)
- I. Insert the date that the Notice of Appeal is signed.
- J. Insert the name of the city in which the Notice of Appeal is signed.
- K. Insert the signature, name, mailing address, telephone number and, if available, electronic mail address of the person authorized to receive service and other communications on behalf of the person tendering the document. (P&P Rules 1.6 and 1.8.) This information is very important because it will be used by the CPUC to develop the official service list to give you notice of further required actions, hearing dates, etc. in the citation appeal. **Note:** *P&P Rule 1.8 requires this document to be signed. Please read the rule carefully as to who may sign the document, how to handle a document tendered on behalf of more than one person, and what representations are made by the signature.*
- L. List here all attachments to the Notice of Appeal and make sure the documents are attached in the format and manner required by P&P Rules 1.5 and 1.13. **Note:** *Citation Appellate Rule 4 requires any authorization of an extension of time to file a Notice of Appeal to be writing and attached to the Notice of Appeal. Rule 4 states: "Unless authorized by a Citation Program, there shall be no extension of time to file a Notice of Appeal from a citation issued pursuant to a Citation Program.....Any authorization of an extension of time to file a Notice of Appeal must be made by the Director (or designee) of the Commission Division*

*which issued the citation, in writing, subject to the provisions of the Citation Program, and must be attached to the Notice of Appeal.”*

## **CERTIFICATE OF SERVICE FORM**

**Note 1:** *If you are filing the Notice of Appeal in hard copy, the Certificate of Service MUST be attached to the Notice of Appeal. If you are filing the Notice of Appeal electronically, according to P&P Rule 1.13(b), the Certificate of Service must be transmitted with the document as a separate document when filing electronically, and this separate document must have its own caption. (See generally Citation Appellate Rule 6 and P&P Rule 1.9(e).)*

**Note 2:** *A Citation Appeal must be served at a minimum on the Chief Administrative Law Judge (with a copy to: [ALJ Div Appeals Coordinator@cpuc.ca.gov](mailto:ALJ_Div_Appeals_Coordinator@cpuc.ca.gov)), and on the Director of the Consumer Protection and Enforcement Division, on the same day that the Notice of Appeal is filed. The Notice of Appeal must also be served on other entities if required by the Citation Program. (See Citation Appellate Rule 6.)*

M. Insert the date that the Notice of Appeal is served.

N. Insert the names and addresses (and email addresses if served electronically) of the persons served with the Notice of Appeal. The generic position names and addresses for the Chief Administrative Law Judge and Director of the Consumer Protection and Enforcement Division are listed on the template. Because the persons in these positions may change, you will have to look up the individual names and email addresses to insert in the template. These names and email addresses can be found on the Commission website.

O. Insert the date the Certificate of Service is signed.

P. Insert the name of the city in which the Certificate of Service is signed.

Q. The person who serves the Notice of Appeal must sign the Certificate of Service and their name must be printed under the signature line.

## **PRIVACY NOTICE FORM**

*Note: The citation appeal is filed with the CPUC, becomes a public record, and will be posted on the Commission's website. Therefore, any information you provide in the Notice of Appeal, including but not limited to, your name, address, city, state, zip code, telephone number, email address, the facts of your rationale for the citation appeal and any other facts stated therein, will be available on-line for later public viewing. The Privacy Statement attached to the Notice of Appeal must be filled out.*

*In limited circumstances, the CPUC may file a document under seal. If you wish to seek to file the Notice of Appeal with some or all of the information under seal, you cannot file electronically and must file in hard copy. Furthermore, that document must be tendered with a motion setting forth the rationale and legal citations as to why portions of the document should be filed under seal and tendered as follows. The Notice of Appeal itself and requisite exact copies should be tendered in both a redacted form (e.g., the document with the alleged confidential information excised) and unredacted form (e.g., a complete copy of the document, with both the public and allegedly confidential information included, in a sealed envelope). It is anticipated that Notices of Appeal for citation appeals will be filed as public documents. In the unlikely event you believe that there are legal grounds for filing a portion of the Notice of Appeal under seal, it may be helpful to consult a private attorney or representative to assist in your representation. However, please note that the timeframes for filing a Notice of Appeal in many citation appeals are short, so you should commence this process as soon as possible.*

R. Sign and date the Privacy Notice and print your name under the signature.

**See Next Page for  
Notice of Appeal Form**

***\*(Note: The capital letters in parenthesis correspond to the instruction sheet and are not part of the official filing.)***

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Appeal of

(A)\* \_\_\_\_\_

\_\_\_\_\_ from (B) \_\_\_\_\_

In the amount of (C) \_\_\_\_\_ issued by the California Public  
Utilities Commission Consumer Protection and Enforcement

Division

(Leave blank for PUC use)

**NOTICE OF APPEAL**

(D) \_\_\_\_\_ files this Notice of Appeal from the citation issued  
on (E) \_\_\_\_\_ with a fine amount of (F)\$ \_\_\_\_\_.

An extension was granted by CPED (if applicable) to (G) \_\_\_\_\_ to file  
this appeal.

The rationale for the appeal is as follows:

(H) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

Dated (I) \_\_\_\_\_, at (J) \_\_\_\_\_, California.

(K) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
  
\_\_\_\_\_  
\_\_\_\_\_

Attachments

(L) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**CERTIFICATE OF SERVICE**

***(Note: The Certificate of Service is attached to the Notice of Appeal only when filing by hard copy. If filing by electronic copy, you must file the Certificate of Service as a separate document. A template for the Certificate of Service as a separate document is also attached to this package.)***

I certify that on (M) \_\_\_\_\_, I have by mail this day served a true copy of the original attached Notice of Appeal on: (N) (Insert Name of Chief Administrative Law Judge \_\_\_\_\_), Chief Administrative Law Judge, California Public Utilities Commission, 505 Van Ness Avenue, 5<sup>th</sup> Floor, San Francisco, CA 94102, (Insert email of Chief Judge) \_\_\_\_\_; [ALJ\\_Div\\_Appeals\\_Coordinator@cpuc.ca.gov](mailto:ALJ_Div_Appeals_Coordinator@cpuc.ca.gov) (electronically); (Insert Name of Director of Consumer Protection and Enforcement Division \_\_\_\_\_, Director, Consumer Protection and Enforcement Division, 505 Van Ness Avenue, San Francisco, CA 94102, (Insert email of Director of CPED) \_\_\_\_\_); and (Insert the names, addresses and emails of anyone else required to be served by the Citation Program you are cited under):

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_.

Dated (O) \_\_\_\_\_, at (P) \_\_\_\_\_, California.

(Q)

\_\_\_\_\_  
\_\_\_\_\_

**Privacy Notice**

This message is to inform you that the Docket Office of the California Public Utilities Commission (CPUC) intends to file the above-referenced Notice of Appeal electronically instead of in paper form as it was submitted.

Please note: Whether or not your Notice of Appeal is filed in paper form or electronically, Notices of Appeal filed with the CPUC become a public record and may be posted on the CPUC's website. Therefore, any information you provide in the Notice of Appeal, including but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the rationale of your Notice of Appeal may be available on-line for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced Notice of Appeal.

(R)

\_\_\_\_\_  
Signature (same as person authorized to sign the Notice of Appeal)      \_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name

**See Next Page for  
Certificate of Service Form  
For Electronic Filings**

***\*(Note: The capital letters in parenthesis correspond to the instruction sheet and are not part of the official filing.)***

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Appeal of

(A)\* \_\_\_\_\_

\_\_\_\_\_ from (B) \_\_\_\_\_

In the amount of (C) \_\_\_\_\_ issued by the California Public

Utilities Commission Consumer Protection and Enforcement

Division

(Leave blank for PUC use)

**CERTIFICATE OF SERVICE**

I certify that on (M) \_\_\_\_\_, I have by mail this day served a true copy of the original attached Notice of Appeal on (N)(Insert Name of Chief Administrative Law Judge \_\_\_\_\_, Chief Administrative Law Judge, California Public Utilities Commission, 505 Van Ness Avenue, 5<sup>th</sup> Floor, San Francisco, CA 94102, (Insert email of Chief Judge); [ALJ\\_Div\\_Appeals\\_Coordinator@cpuc.ca.gov](mailto:ALJ_Div_Appeals_Coordinator@cpuc.ca.gov) (electronically); (Insert Name of Director of Consumer Protection and Enforcement Division) \_\_\_\_\_, Director, Consumer Protection and Enforcement Division, 505 Van Ness Avenue San Francisco, CA 94102, (Insert email of Director of CPED) \_\_\_\_\_);

and (Insert the names, addresses and emails of anyone else required to be served by the Citation Program you are cited under):

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Dated (O) \_\_\_\_\_, at (P) \_\_\_\_\_, California.

(Q)

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***(Note: This Certificate of Service as a separate document is to be used if you are filing the Notice of Appeal electronically. If you are filing the Notice of Appeal by hard copy, you must attach the Certificate of Service to the Notice of Appeal.)***

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Resolution ALJ-187  
Administrative Law Judge Division  
September 22, 2005

**RESOLUTION**

RESOLUTION ALJ-187. Adopts Procedures for Appeal of Citations Issued to Household Goods Carriers, Charter Party Carriers, and Passenger Stage Corporations.

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By a series of previous resolutions, the Commission has developed a program under which the Consumer Protection and Safety Division (CPSD) is authorized to issue citations to various classes of carriers for violation of the Public Utilities Code or Commission orders. In turn, a carrier issued such a citation may accept the fine imposed or contest it through a process of appeal. Now, in an effort to make this program more comprehensive and this process more efficient, the Commission has prepared new procedures to govern the appeal of these citations.

A draft of this resolution was issued on August 19, 2005, for public review and comment. No one filed comments. The resolution is adopted as originally proposed with minor clarifications.

**IT IS THEREFORE RESOLVED** that the following procedures shall govern appeals of citations for violation of statutes or Commission orders relating to household goods carriers, charter party carriers, and passenger stage corporations:

1. *Citation: Contents.* The citation served upon the respondent by the investigator shall include:
  - (a) A specification of each statute or Commission order allegedly violated;
  - (b) A statement of the facts upon which each alleged violation is based;
  - (c) A statement that the respondent may either pay the amount of the fine set forth in the citation or appeal the citation, as set forth herein, and that the respondent will forfeit the right to appeal the citation by failing to do either of these things within the allowable period;

- (d) An explanation of how to file an appeal, including an explanation of the respondent's right to have a hearing, to have a representative at the hearing, to request a transcript, and to request an interpreter; and
  - (e) A form of Notice of Appeal, and the form for requesting an interpreter.
2. *Citation: Response.* The respondent, within 20 days after the date of service of the citation, shall either remit payment of the full amount of the fine to CPSD, agree with CPSD on conditions for payment, or serve a Notice of Appeal upon CPSD. Upon request made to CPSD before the expiration of this deadline, the time to pay the fine or serve a Notice of Appeal may be extended by CPSD for a reasonable period not to exceed 30 days. CPSD may, in its discretion, grant one additional extension at the request of the respondent.
3. *Citation: Payment of fine; default.* If the respondent pays the full amount of the fine within the time allowed hereunder, the citation shall become final. If the respondent, within the time allowed pursuant to Paragraph 2, fails to pay the full amount of the fine or to file a Notice of Appeal, or if the respondent, having entered into an agreement with CPSD, fails to comply with any provision of that agreement, the respondent shall be in default, and the citation shall become final. In this event, the respondent shall have forfeited its right to appeal the citation, and CPSD shall immediately suspend the respondent's license. If the respondent fails to pay the full amount of the fine within 30 days thereafter, CPSD shall revoke the respondent's license, and may take any other action provided by law to recover any unpaid fine and ensure compliance with applicable statutes and Commission orders.
4. *Citation: Appeal.*
- (a) The Chief Administrative Law Judge shall designate an Administrative Law Judge to hear appeals of citations.
  - (b) Appeals of citations shall be heard in the Commission's San Francisco or Los Angeles courtrooms on regularly scheduled days. Appeals shall be calendared accordingly, except that a particular matter may be recalendared at the direction of the designated Administrative Law Judge.
  - (c) The appeal shall be brought by serving a Notice of Appeal upon CPSD, and the respondent shall indicate the grounds for the appeal in the notice. CPSD shall promptly advise the Chief Administrative Law Judge upon receipt of a timely Notice of Appeal.
  - (d) Upon advice from CPSD that a citation has been appealed, the Chief Administrative Law Judge shall promptly forward the matter to the

designated Administrative Law Judge, who shall set the matter for hearing on the first Citation Calendar not less than 10 days after advice of the appeal is received from CPSD. The Administrative Law Judge may, for good cause shown or upon agreement of the parties, grant a reasonable continuance of the hearing.

- (e) The respondent may order a transcript of the hearing, and shall pay the cost of the transcript in accordance with the Commission's usual procedures.
  - (f) The respondent shall be entitled to the services of an interpreter at the Commission's expense upon written request to the Chief Administrative Law Judge not less than three business days prior to the date of the hearing.
  - (g) The respondent may be represented at the hearing by an attorney or other representative, but such representation shall be at the respondent's sole expense.
  - (h) At the hearing, CPSD shall open and close. The Administrative Law Judge may, in his or her discretion, alter the order of presentation. Formal rules of evidence do not apply, and all relevant and reliable evidence may be received in the discretion of the Administrative Law Judge.
  - (i) Ordinarily, the appeal shall be submitted at the close of the hearing. In the discretion of the Administrative Law Judge upon a showing of good cause, the record may be kept open for a reasonable period to permit a party to submit additional evidence or argument.
  - (j) The Administrative Law Judge shall issue an order resolving the appeal not later than 30 days after the appeal is submitted, and the order shall be placed on the first available agenda, consistent with the Commission's applicable rules.
  - (k) From the date that CPSD receives a Notice of Appeal to and including the date when the final order is issued, neither the respondent nor the investigator, or agent or other person on behalf of the respondent or investigator, may communicate regarding the appeal, orally or in writing, with a Commissioner, Commissioner's advisor, or Administrative Law Judge, except as expressly permitted under these procedures.
5. *New Operating Authority.* A carrier whose license has been revoked hereunder may apply for new operating authority upon paying the fine in full. The application shall document (1) full payment of the fine, (2) correction of all violations for which the carrier was cited, (3) actions the carrier proposes in

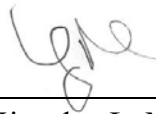


## CERTIFICATE OF SERVICE

I certify that I have on this day served the following documents on Rafo Investment Inc.

1. Administrative Citation T.2026-05-010 dated May 28, 2026.
2. Investigation report and Attachments
3. Citation Compliance Agreement
4. Credit/Debit Card Authorization Form
5. How to File an Appeal
6. *Notice of Appeal Form* and *Certificates of Service Form* (from Resolution ALJ-377)
7. Resolution ALJ-187
8. Certificate of Service

Date: May 28, 2026

  
\_\_\_\_\_  
Kingsley L. Melton  
Regulatory Analyst