BOARD REPORT  
CITY OF LOS ANGELES  
DEPARTMENT OF TRANSPORTATION

Date: May 11, 2023

To: Board of Transportation Commissioners

From: Connie Llanos, Interim General Manager

Subject: RECOMMENDED PENALTY ASSESSMENT AND PERMANENT REVOCATION OF 16 UNRESTRICTED PRIVATE AMBULANCE AND 6 UNRESTRICTED NON-AMBULATORY GURNEY VEHICLE PERMITS HELD BY SKORI, INC. DBA WEST COAST AMBULANCE (COMPANY ID #2482)

RECOMMENDATIONS

That your Board:

a. **Find** that an investigation conducted by the Department confirmed that from July 1, 2022 through September 30, 2022, Skori, Inc. dba West Coast Ambulance (West Coast) conducted a total of 1,713 illegal patient transports from addresses within the City of Los Angeles using unpermitted private ambulance and non-ambulatory gurney vehicles; a violation of Los Angeles Municipal Code (LAMC) §71.02(a), and using unpermitted drivers and attendants, a violation of LAMC §71.03(a).

b. **Find** that West Coast's 1,713 violations, resulting in an assessed monetary penalty of $1,711,500.00 are deemed to be flagrant, egregious and excessive; endanger the welfare of the public; and therefore, constitute grounds for the assessment of the monetary penalty as well as revocation of West Coast's 16 unrestricted private ambulance and 6 unrestricted non-ambulatory gurney vehicle permits pursuant to the provisions contained in LAMC §71.09.2(a) and §71.08.

c. **Confirm** the assessment of the $1,711,500.00 monetary penalty.

d. **Permanently** revoke West Coast.

e. **Direct** the Department that it shall not accept any future application(s) from Skori, Inc. dba West Coast Ambulance, West Coast Ambulance or any of its affiliates; and any of its owners, principals, operational managers, and/or family unless conditions set forth in this report have been met.

f. **Require** any potential future applications submitted by any current West Coast owners, family members, managers, stakeholders, and/or shareholders applying under any other company name to submit proof in a form approved by the Department, of payment of the monetary penalty, and compliance with the conditions set forth in this report.

g. **Require** any potential future applications submitted by any current West Coast owners, family members, managers, principals, stakeholders, and/or shareholders applying under any other company name to submit to the Department a Performance Bond in the amount to be determined by the Board, but in no case less than 25% of the assessed
INITIATED BY

The Department initiated this report in view of the Department’s findings of repeated egregious and flagrant illegal transportation operations performed by West Coast.

DISCUSSION

Company History

WCA dba West Coast Ambulance (Company Code #1234.0) was originally authorized by the Board of Transportation Commissioners (Board) to operate two unrestricted private ambulance vehicles on November 13, 2003. By September 9, 2010, the company had increased their authorized private ambulance fleet to 12 unrestricted vehicles.

On September 14, 2017, West Coast was reassigned under new ownership as Skori, Inc. dba West Coast Ambulance (Company Code #1609.0). The number of permitted private ambulances remained at 12.

On August 24, 2020, West Coast was granted a fleet increase of one unrestricted non-ambulatory-gurney vehicle and four unrestricted private ambulances.

West Coast again increased the number of unrestricted non-ambulatory gurney vehicles by five vehicles on November 15, 2021, giving the company a total of 16 unrestricted private ambulances and six unrestricted non-ambulatory gurney vehicles.

When the current Taxicab Ambulance Vehicle-for-Hire Information System (TAVIS) went into production in June 2020, West Coast was assigned its current Company Identification Number of 2482. The company is currently active and authorized to operate 16 unrestricted private ambulances and six unrestricted non-ambulatory gurney vehicles for a total of 22 vehicle authorities.

Violation History:

August 24, 2021: West Coast was found in violation of L.A.M.C. §71.03(b) - unpermitted driver and §71.04.1- unpermitted non-ambulatory attendant. The company was assessed a $1,000.00 Monetary Penalty. The penalty was paid on September 16, 2021.

November 5, 2021: West Coast was assessed a monetary penalty of $300.00 for failure to maintain automobile insurance as required by L.A.M.C. §71.14. This penalty was paid on November 18, 2021.

November 11, 2021: West Coast was found in violation of L.A.M.C. §71.02(a) - unpermitted vehicle and assessed a penalty of $500.00. That penalty was also paid on November 18, 2021.

Violation Verification Process

When the Department receives a complaint of alleged illegal operations committed by a permitted passenger transportation company, the following process is used to verify whether or not a violation or violations have occurred:
1. If documentation or evidence is included with the complaint, staff performs a preliminary examination to determine if there is evidence of possible violations. The subject company is notified to send the appropriate records for the Department to examine. The documents are then examined and compared with evidence, if any, submitted by the complainant.

2. The permit status of the company as well as any listed drivers, attendants and vehicles shown in the records or documentation submitted by both the company and the complainant are verified through TAVIS.

3. Every address listed in the records where a pick-up was performed is confirmed through the City's Zoning Information and Map Access System (ZIMAS). Addresses that do not occur within the boundaries of the City of Los Angeles, as well as trip cancellations, and dry runs are excluded from the investigation.

4. Predicated on the results of the comparison and the finding, if any, that violations have been confirmed, an investigative interview is scheduled with the company to allow the company's representatives the ability to present evidence on their behalf. Depending on the outcome of this interview, the company may or may not be found guilty of the alleged violation(s).

5. If after the hearing and examination of all evidence Department staff concludes that there is sufficient evidence that violations have occurred, the Department may assess a monetary penalty, suspension or both, or if the violations are deemed to be hazardous to public health and safety, flagrant or egregious, the Department will present the company to the Board with a recommendation for further disciplinary action.

INVESTIGATION

“West Coast” Investigation Timeline

On October 5, 2022, the Department received a complaint and information suggesting that West Coast was performing patient transports using unpermitted vehicles from addresses located within the City.¹

The documentation attached to the complaint covered a 92-day period from July 1, 2022 through September 30, 2022, and appeared to be patient transport records from West Coast's database. The records were submitted anonymously.

The documentation submitted was extensive and included dates, patient names, medical condition information, times, unit numbers, mileage, insurance information, and pick-up and drop-off locations. The document did not include driver or attendant names. The absence of driver and attendant names limited the investigation to vehicle usage and patient pick-up addresses only. Initial examination of this document found that a large number of the trips listed could potentially be verified as violations of L.A.M.C. §71.02(a) - unpermitted vehicle. Staff then began a more intense examination of the document.

¹The records received on October 5, 2022, included tabs indicating the time the trip was scheduled, time of patient pick-up, the appointment time, and pick-up and drop-off addresses, as well as: reasons for the transport, funding information, mileage, trip identification numbers, and incidental notes regarding additional patient care, illness and status etc. Fields containing information that were irrelevant to the investigation or of a confidential nature were not included in this investigation. Only those facts relating to patient transports were included.
December 14, 2022:

In order to do a thorough investigation of the alleged violations, staff submitted a request to West Coast, via email and the company's TAVIS landing page for dispatch and trip/transport records for the dates of July 1, 2022 through September 30, 2022. The deadline to submit the requested document was December 28, 2022. At 8:03 p.m. on December 27, 2022, the Department received an email from Ruben Balayan (Balayan) of West Coast, requesting an extension to submit the requested documentation. Balayan cited severe understaffing due to the holidays as the reason for the extension request. As a courtesy, the deadline to submit the requested documentation was extended to January 5, 2023. (Attachment 1)

January 5, 2023, 4:30 p.m.:

Staff received a call from Don Wolfe, (Wolfe), attorney for Wolfe Attorneys & Mediators. Wolfe stated that he had recently been contracted to represent and act as a legal representative for West Coast. He requested a two-week extension so he could familiarize himself with the case and ensure that the Department received the correct documentation. Staff advised Wolfe that he needed to submit confirmation that he was legally able to represent West Coast before the extension could be given. Once the Department received confirmation of legal representation, the deadline would be extended to January 19, 2023.

On January 10, 2023, the Department received a "Notice of Legal Representation: Mr. Ruben Balayan and Skori, Inc., d/b/a West Coast Ambulance". (Attachment 3) Staff confirmed the extension until January 19, 2023, allowing the company time to submit the requested documentation. The documentation was submitted by West Coast on January 19, 2023 at 4:48 p.m. 2

Examination of the documentation submitted by West Coast appeared to be business or billing records not the requested dispatch/trip records, although they do include trip/transport information as well as driver and attendant names. Only ambulance trips are shown.

Even though the October 5, 2022 document contained both ambulance and non-ambulatory gurney vehicle transports, there were no trips/transports recorded in the documentation that used any of the company's six unrestricted permitted non-ambulatory gurney vehicles.

Investigative Findings

The examination of October 5, 2022 documentation received from an anonymous source listed a total of 4,757 recorded trips. A large number of the transports listed on the spreadsheets were verified as violations of L.A.M.C. §71.02(a) - unpermitted vehicle as listed below:

October 5, 2022 Documentation:

For July, there were a total of 1,339 trips originating within the City. One Hundred fifty-seven were confirmed to be illegal transports using unpermitted vehicles. (Attachment 4)

2 A notation at the bottom of the document states: "This export was produced 2023-01-19:4:16 by westcoast.angeltracksoftware.com for user Balayan."
In August, there were 1,679 trips listed originating within the City. Two hundred seventy-three were confirmed to be illegal transports using unpermitted vehicles. (Attachment 5)

September showed a total of 1,739 trips listed originating within the City. Two hundred nineteen were confirmed to be illegal transports using unpermitted vehicles. (Attachment 6)

**West Coast Documentation:**

The documentation received directly from West Coast showed that a total of 1,223 transports occurred within the City from July 1, 2022 through September 30, 2022.

July listed a total of 404 trips that originated within the City. There were no violations of L.A.M.C. §71.02(a) - unpermitted vehicle found; however, there were 313 violations of L.A.M.C. §71.03(a) - unpermitted driver. (Attachment 7)

A Total of 422 trips were recorded as originating within the City for August with 361 violations of L.A.M.C. §71.03(a) - unpermitted drivers were confirmed. (Attachment 8)

September’s records showed a total of 397 trips that originated within the City, with 390 violations of L.A.M.C. §71.03(a) - unpermitted driver. (Attachment 9)

Crew member names are listed in the West Coast document under the headings “Attending Crew Member” and “Other Crew Members,” instead of “Driver” and “Attendant”. Names listed in the "Attending Crew Member" column are always singular, possibly indicating the driver, whereas, the "Other Crew Members" column may contain anywhere from one to as many as four names not including the patient being transported. Some of the fields were blank or only listed one name. The solitary crew member’s name usually occurred when one-way trips were involved.

Both columns contained numerous names of persons who did not possess LADOT driver or attendant permits, possessed permits for companies other than West Coast, or whose driver permits had expired at the time of the transport. During some transports, no one with a valid LADOT driver or attendant permit was listed as crew member. In this documentation, there was a high incidence of trips that listed two EMTs in the Other Crew Members in addition to a name in the "Attending Crew Member" column. In other cases, no name is listed in the "Attending Crew Member" column or the person named possessed an LADOT attendant permit instead of a driver permit. Many trips listed the names of Respiratory Therapists (RT) or Registered Nurses (RN), none of which held any LADOT permit.

If employed by the company, such experts must possess an LADOT driver or attendant permit prior to allowing them to crew permitted vehicles or pick-up patients within the City. Persons holding attendant permits may not act as drivers.

Names listed in the "Other Crew Members" field have shown two Respiratory Therapists and two EMTs, or sometimes three EMTs potentially indicating a crew of four to five for those transports, not including the patient.

Staff also noticed that the records showed a pattern of exclusivity in that only certain ambulance drivers and attendants out of all the company’s LADOT permitted personnel were listed, even though others had valid permits and, as mentioned before, only ambulance vehicles were listed.
Due to the ambiguity of the column headings which did not indicate who was the driver and who was acting as the attendant(s), staff did not attempt to differentiate between the two potential violations, instead, treating all unpermitted crew members as a violation of L.A.M.C. §71.03(a) - unpermitted driver. The names of the RTs and RNs were not included in this investigation.

**NOTE**: The West Coast document showed trips within all three months using ambulance Unit #68. West Coast originally notified the Department on December 16, 2021 that Unit #68 was temporarily out of service due to collision damage. Staff was unable to confirm that Unit #68 was ever officially placed back in service, but a notation in TAVIS indicates it was permanently removed from the company's fleet on November 9, 2022. Because the status of this vehicle could not be confirmed from December 17, 2021 through November 9, 2022, those trips were not included in this investigation.

Additional Information

During the week of February 20, 2023 through February 24, 2023, Investigators were sent out into the field to survey 10 random addresses taken from the West Coast document in order to verify that patients were being picked up and transported from those addresses. The Investigators did not observe any patients picked up by West Coast at any of the listed locations.

On February 17, 2023, the Department notified West Coast, via email and regular mail, of a scheduled Show Cause Hearing regarding the findings of the investigation. The hearing was scheduled for 10:00 a.m.

On February 22, 2023, staff found a typographical error and sent a corrected copy of the letter via regular mail and email. (Attachment 10) Wolfe, the company's legal representative, contacted staff on February 22, 2023 at 11:45 a.m. stating that Balayan was out of town and requesting an extension for the hearing. The hearing date was extended to March 1, 2023 at 3:00 p.m.

Staff discovered an additional guest had been added to the hearing. On February 24, 2023, an email was sent to Ms. Annie Nguyen (The Lew Firm) requesting that she have Mr. Balayan submit authorization from him to be a representative. No such notice has yet been received.

March 1, 2023, Show Cause Hearing:

Persons in attendance were Senior Transportation Investigator Barker (Sr. Investigator Barker), Los Angeles Deputy City Attorney Michael Nagle, Chief Transportation Investigator Julio Zacarias, Ruben Balayan, Chief Executive Officer of West Coast and Don Wolfe from Wolfe Attorneys & Mediators.

Sr. Investigator Barker presented the findings of the investigation and indicated that due to the egregious violations found, the company would be taken to the Board of Transportation Commissioners for further disciplinary action.

---

3 Example: August 12, 2022. None of the crew names listed had LADOT permits. That same day, the company's manager transported a patient without any attendants. She does not possess any LADOT issued permit.

4 Historically, Respiratory Therapists and Registered Nurses are assigned by the healthcare system covering the patient to accompany the patient and not employees of the company transporting.
When Balayan was asked about the abundance of violations he had no actual answer. Wolfe indicated that he wanted to end the hearing and get on a better footing about what to do. He advised Balayan to not offer any more information and they excused themselves from the hearing without offering any evidence to refute the investigation’s findings.

**CONCLUSION**

After examination of the documentation, staff concluded that there was a sufficiently large amount of data consistent with the company and its records, such as the duplication of pick up addresses, patient names, driver and attendant names, and vehicle unit numbers consistent with the company’s LADOT records to confirm both documents originated from West Coast. After confirming the violations, the appropriate monetary penalties assessed for the violations found in both sets of documents are as follows:

### July 2022

<table>
<thead>
<tr>
<th>Document</th>
<th>Total violations found for July 2022</th>
</tr>
</thead>
<tbody>
<tr>
<td>157</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Violation</th>
<th>71.03 (b)</th>
<th>71.02(a)</th>
<th>71.02(a)</th>
<th>71.02(a)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zero violations</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>First violation</td>
<td>$500</td>
<td>$750</td>
<td>$156,250</td>
<td>$311,000</td>
</tr>
<tr>
<td>Violations #3 – 157: 71.02(a)</td>
<td>$156,250</td>
<td>$156,250</td>
<td>$156,250</td>
<td>$156,250</td>
</tr>
</tbody>
</table>

Total Monetary Penalty for July: $156,250

### August 2022

<table>
<thead>
<tr>
<th>Document</th>
<th>Total violations found for August 2022</th>
</tr>
</thead>
<tbody>
<tr>
<td>273</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Violation</th>
<th>71.03 (b)</th>
<th>71.02(a)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zero violations</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>273 violations: 71.02(a)</td>
<td>$273,000</td>
<td>$273,000</td>
</tr>
</tbody>
</table>

Total Monetary Penalty for August: $273,000

### September, 2022

<table>
<thead>
<tr>
<th>Document</th>
<th>Total violations found for August 2022</th>
</tr>
</thead>
<tbody>
<tr>
<td>219</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Violation</th>
<th>71.03 (b)</th>
<th>71.02(a)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zero violations</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>219 violations: 71.02(a)</td>
<td>$219,000</td>
<td>$219,000</td>
</tr>
</tbody>
</table>

Total Monetary Penalty for August: $219,000

### October 5, 2022 Document

#### West Coast Document

<table>
<thead>
<tr>
<th>Total violations found for July 2022:</th>
<th>313</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zero violations: 71.02(a) =</td>
<td>$0</td>
</tr>
<tr>
<td>First violation: 71.03(b) =</td>
<td>$500</td>
</tr>
<tr>
<td>Second violation: 71.03(b) =</td>
<td>$750</td>
</tr>
<tr>
<td>Violations #3 – 303: 71.03(b) =</td>
<td>$311,000</td>
</tr>
</tbody>
</table>

Total Monetary Penalty for July: $312,250

<table>
<thead>
<tr>
<th>Total violations found for August 2022:</th>
<th>361</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zero violations: 71.02(a) =</td>
<td>$0</td>
</tr>
<tr>
<td>361 violations: 71.03(b) =</td>
<td>$361,000</td>
</tr>
</tbody>
</table>

Total Monetary Penalty for August: $361,000

<table>
<thead>
<tr>
<th>Total violations found for August 2022:</th>
<th>390</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zero violations: 71.02(a) =</td>
<td>$0</td>
</tr>
<tr>
<td>390 violations: 71.03(b) =</td>
<td>$390,000</td>
</tr>
</tbody>
</table>

Total Monetary Penalty for August: $390,000

<table>
<thead>
<tr>
<th>Grand Total Confirmed Violations:</th>
<th>649</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grand Total Monetary Penalties:</td>
<td>$648,250</td>
</tr>
<tr>
<td>Total Monetary Penalty for August:</td>
<td>$219,000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grand Total Confirmed Violations:</th>
<th>1,064</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grand Total Monetary Penalties:</td>
<td>$1,063,250</td>
</tr>
<tr>
<td>Total Monetary Penalty for August:</td>
<td>$390,000</td>
</tr>
</tbody>
</table>
TOTAL COMBINED VIOLATIONS FOUND: 1,713
TOTAL COMBINED MONETARY PENALTY: $1,711,500.00

PROPOSED DISCIPLINARY ACTION

West Coast’s length of time (20 years) as a permitted company along with their violation history indicates that the company knew or should have known that use of unpermitted vehicles, drivers, and attendants to pick-up and transport patients from locations within the City is illegal.

The October 5, 2022, document listed a total of 4,757 patient transports conducted. Six hundred and forty-nine of them, or 30.9% were confirmed to be illegal transports. The document submitted by West Coast listed a total of 1,223 transports, a difference of 3,521 less trips from the October document.

One-thousand seven hundred and thirteen, or approximately 140%\(^5\) of all transports listed in the West Coast documents were confirmed to be illegal.

The evidence shows an egregious pattern of disregard for both the City’s rules and regulations as well as the health and safety of the patients West Coast is transporting. Although possible Medicare and MediCal fraud was not considered or included for reasons expressed in this report, it is a possibility and the Board may also consider that if these transports were not performed on a pro bono basis but instead invoiced through a health care plan, private payee, Medicare, Medicaid, Medi-Cal or private insurance plan it could constitute healthcare fraud as outlined in California Penal Code §550(a) (5) and §550 (a) (6) as well as Title 81 U.S.C. §1349.\(^6\)

It is the strong recommendation of staff that West Coast be assessed the monetary penalty of $1,711,500.00. It is also strongly recommended that the company be permanently revoked and request that the Commissioners direct the Department that it shall not accept any future applications from Skori, Inc., WCA dba West Coast Ambulance, West Coast Ambulance, the owners (et al), as well as any members of their family, managers, stakeholders, shareholders or its principals operating under the same or any other company name until the following conditions are met:

1. The new company provides sufficient proof to the satisfaction of the Department that no member of the current operational staff, including owners, managers, principals, stakeholders, shareholders and/or the family member(s) of anyone holding a decision making position in the company, or any other employee holding a decision making position within West Coast at the time of this investigation, has any decision making position or operational power within the new company.

\(^5\)This percentage is so high because of the high number of trips that included multiple unpermitted driver and attendant violations.

\(^6\)The City does not examine payment or billing records. If any confirmed illegal transports that occurred within the City were billed to or paid by an insurance carrier, MediCare, Medicaid, Medi-Cal or private payee, those transports could be considered fraud by the State of California’s Penal Code.
2. The assessed Monetary Penalty, including accrued penalties and interest, if any, has been paid by the owners, shareholders, etc. of Skori, Inc. dba West Coast.

3. The company submitting the application to operate as a presumed new company includes a Performance Bond in a certified payment form acceptable to the Department in the amount equaling no less than one-fourth of the assessed monetary penalty of $1,711,500.00 ($427,875.00), exclusive of any accrued penalties and interest to the Department. This Bond shall be held by the Department for a period of no less than two years.

4. Upon the Board’s approval, the company fulfilling all requirements of the Department including placement of vehicles into service, insurance, and permitting of drivers and attendants.

5. The company agrees to submit any operational reports or other requested information to the Department for auditing or investigative purposes by the date indicated by the Department.

6. The new company shall be placed on a two-year probationary period in which no violations of L.A.M.C. §71.00, et al, any City Board Order, and/or rule or regulation shall occur. Any confirmed violation within that two-year probationary period shall result in the immediate forfeiture of the Performance Bond and permanent revocation of the new company without further action by the Board.

Applicable Regulations

Vehicle permits are addressed in LAMC § 71.02(a) which states, in part:

"No person or corporation shall drive, operate, or use, whether as owner, lessor, lessee or otherwise, any of the vehicles defined in Section 71.00 to Pick-up or attempt to Pick-up passengers within the limits of the City of Los Angeles, or allow or permit to be operated, driven, or used, whether as owner, lessor, lessee, or otherwise, any of the vehicles defined in Section 71.00 to Pick-up or attempt to Pick-up passengers within the limits of the City of Los Angeles, unless a written vehicle permit for the operation of such specifically defined vehicles has been obtained from the Board."

Driver permits are addressed in LAMC §71.03(a), which states:

"No person shall drive a private ambulance as defined in Section 71.00 without first having obtained an ambulance driver permit from the Board."

Ambulance Attendant permits are addressed in LAMC §71.04, which states:

"No person shall act as an ambulance attendant in a private ambulance unless such person holds an ambulance attendant permit or an ambulance driver permit issued by the Board."
Grounds for revocation of permits is addressed in LAMC Section 71.08(b), which states:

"The following shall constitute grounds for denial, revocation, suspension or cancellation of any driver, attendant, or vehicle permit for which this article makes provision:

(b) Violation of any rule or regulation of the Board, any section of the Los Angeles Municipal Code, Los Angeles Administrative Code and other ordinances of the City, any rule or regulation of the Department of Airports, and any section of a State Statute or Administrative Code, relating to the operation of a vehicle defined in Sec. 71.00 and for which a permit is required under this code."

Waiver of hearing is addressed in Section 71.09(d), which states:

"Failure of permittee to respond to a notice to appear for a hearing before the General Manager of the Department or his authorized representative or before the Board is a waiver of the right to a hearing and action may be taken without permittee being present."

Monetary Penalties are addressed in LAMC §71.09.2(h) and (i) which states, in part:

(a) "Monetary penalties may be levied against an individual permit holder in lieu of in addition to suspension, revocation or cancellation of permits as describe in 71.09. Monetary penalties may be levied on a per violation or a per day basis and may escalate on a first, second, or third violation basis. Violations which endanger the public health, welfare, and/or safety shall receive the maximum penalties.

(h) "A penalty of 10% or as otherwise established by the Board of the amount of the payment shall be assessed on any payment which has become delinquent. Failure to pay any delinquent payment on or before the last day of the fourth month following the date on which the payment first became delinquent will result in the assessment of a second penalty of 10% of the amount of the payment in addition to the amount of the payment and the 10% penalty first imposed."

(i) "In addition to the penalties imposed above, failure to pay any payment required by ordinance and by the franchise or operating permit will result in the assessment of interest charges at the rate of 1-1/2% per month, or fraction thereof, on the amount of the payment, exclusive of penalties, from the date on which the payment first became delinquent until it is paid."
Board of Transportation Commissioners

May 11, 2023

Board Order 580, Rule (a) states:

1. VEHICLE PERMITTEES

   Violation

   a. "Using an unpermitted vehicle
      Pick-up or attempt to Pick-up
      passengers in the City:"

      First                     Second           Third or
      more

      $500                     $750             $1,000

Board Order 580, Rule (b) states:

1. VEHICLE PERMITTEES

   Violation

   b. "Authorizing a person without a
      valid driver’s permit issued by the
      Department to pick up or attempt
      to pick up passengers in the City:"

   First                     Second           Third or
   more

   $500                     $750             $1,000

Board Order 580 states, in part:

"Any occurrence/incident may have multiple violations and each violation will be reviewed
and assessed independently. Any three occurrences/incidents of violations within a 12-month
period may result in the Department’s recommendation to the Board to revoke all existing
permits and impose a probationary period, for no less than one year, during which time no
new applications will be accepted. Furthermore, depending on the severity of the
violations(s), the Board may revoke all existing permits after the first or second violation and
impose a probationary period of no less than one year."

JMM/pab
B23-
004.pab