

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA

CIVIL DIVISION, ARBITRATION

AND STATUTORY APPEALS ONLY

vs.

CASE NUMBER: SA-23-552

Pennsylvania State Constabulary

TYPE OF PLEADING:

OPERATOR'S LICENSE SUSPENSION

REGISTRATION PLATE SUSPENSION

Defendants,

CODE AND CLASSIFICATION: 306

FILED ON BEHALF OF:

Pennsylvania State Constabulary

(Name of party - indicate Plaintiff or Defendant)

NAME, ADDRESS AND TELEPHONE OF:

- Council of Record
- Individual, if Pro Se

114819  
6 October 2023  
12:14:00  
SA-23-000562

Pennsylvania State Constabulary  
320 Fort Duquesne Blvd Ste 235  
Pittsburgh PA 15222-1107  
(412) 930-0370  
agency@stateconstablepa.us

Attorney's State ID #

Attorney's Firm ID #

THIS CASE WILL BE HEARD  
HEARING DATE 1.4.24

TIME: 8:15 A.M.

PLACE: CITY-COUNTY BLDG.

8TH FLOOR, ROOM 21 414 GRANT STREET

(412) 350-6823

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA  
CIVIL DIVISION

COMMONWEALTH OF PENNSYLVANIA

vs.

Statutory Appeal Docket

Pennsylvania State Constabulary  
Defendant

No. SA \_\_\_\_\_

PETITION FOR APPEAL FROM ORDER OF SECRETARY OF TRANSPORTATION SUSPENDING OPERATOR'S LICENSE/REGISTRATION PLATE NUMBER.

TO THE HONORABLE JUDGES OF SAID COURT:

1. Petitioner is Pennsylvania State Constabulary an individual residing at 320 Fort Duquesne Blvd Ste 235 Pittsburgh PA 15222

2A. On or about \_\_\_\_\_, 20\_\_\_\_, petitioner received a notice from the PA Dept. of Transportation notifying him/her that his/her operator's license, bearing card number \_\_\_\_\_ was being suspended as of \_\_\_\_\_, 20\_\_\_\_ by reason of violation of Vehicle Code \_\_\_\_\_ or \_\_\_\_\_ (STRIKE OUT THE INAPPLICABLE CLAUSE 2A OF 2B)

2B. On or about September 11, 2023, petitioner received a notice from the PA Department of Transportation notifying him/her present registration plate number MG3590N was being suspended as of Sept 26, 2023 by reason of Section ~~1373~~ 1373(b)

A copy of said notice is attached hereto and marked Exhibit "A"

3. Petitioner respectfully prays that this appeal be allowed under Section 1550 of the Vehicle Code: that a hearing date be granted de novo to determine whether petitioner is subject to suspension of his/her license or registration plate number and this appeal act as a supersedeas pending said hearing.

Pennsylvania State Constabulary depose and say that the averments of the facts contained in the within appeal are true and correct to the best of my knowledge.

SWORN TO AND SUBSCRIBED BEFORE ME

this 6th day of OCT 2023  
by Michael McPeck, Director  
PS, Clerk





September 11, 2023

PENNSYLVANIA STATE  
CONSTABULARY  
320 FORT DUQUESNE BLVD  
STE 235 PO BOX 22070  
PITTSBURGH PA 15222

To Whom it May Concern:

This letter is regarding your Pennsylvania registration plate number MG3590N, which was issued in error as registration covering your 2018 Ford, title number 78865259.

Section 1373(b) of the Vehicle Code provides that:

The department may suspend a registration without providing an opportunity for a hearing in any of the following cases:

- (1) Upon the request or order of any court of record.
- (2) The required fees have not been paid.
- (3) An out-of-service order has been issued for the vehicle, the owner or the operator by the department or by the United States Department of Transportation.
- (4) The vehicle is being operated in violation of section 4704(b)(1) (relating to inspection by police or Commonwealth personnel).

More specifically, the above referenced registration was issued to your vehicle without payment of the required fees because Pennsylvania State Constabulary is not a government or quasi-government entity (i.e., political subdivision or municipal authority) and is not eligible for the exemption information that was claimed. You are not eligible for the Municipal Government (MG) registration plate.

Accordingly, the registration plate referenced above is suspended indefinitely as authorized by Section 1373(b)(2) of the Vehicle Code. The suspension is effective 15 days from the date of this letter.

This is an Official Notice of Suspension. You have a right to appeal this action to the Court of Common Pleas (Civil Division) within 30 days of the date of this letter. If you file an appeal in the Court of Common Pleas, the Court will give you a time stamped certified copy of the appeal. In order for your appeal to be valid, you must send the time stamped certified copy of the appeal by certified mail to:

Insert Name

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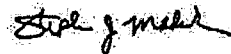
Insert Date

Pennsylvania Department of Transportation  
Office of Chief Counsel  
1101 South Front Street, Third Floor  
Harrisburg, PA 17104-2516

You are required to return registration plate number MG3590N to the Department. A self-addressed envelope is enclosed to assist you with the return of the registration plate. In addition, you must submit a new application using form MV-140, request for registration, and submit with the applicable fees. When the MG3590N registration plate and request for registration application with fees is received by the Department, you will receive a new standard issue registration for your vehicle.

For additional information, you must contact Joshua Kline of the Research and Support Operations Section at 717-705-0796.

Sincerely,



Stephen J. Madrak,  
Director of Motor Vehicles