



**PERL & GOODSNYDER, LTD.**  
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October 22, 2018

**SENT VIA FEDEX PRIORITY OVERNIGHT**

*TRACKING NUMBER: 773539122750*

**Illinois Commerce Commission**  
Processing and Information Section  
527 East Capitol Avenue  
Springfield, Illinois 62701

**TRANSPORTATION**  
OCT 23 2018  
**DIVISION**

**Re: 74 RTV-R Sub 15, 81440 MC**

Dear Clerk of the Commerce Commission:

Enclosed herewith please find an original and three (3) copies of the following documents in the above referenced matter:

- Notice of Filing;
- Notice of Petition;
- Certificate of Service;
- Service List; and
- Petition for Leave to Intervene.

The documents are being presented to your office for filing in the above referenced matter.

Thank you for your attention to this matter. Should your office require any additional materials, please do not hesitate to contact our firm directly at (312) 243-4500.

Sincerely,

Vlad V. Chirica

Enclosures

cc: *VIA EMAIL ONLY*  
Donald Steven Rothschild  
GOLDSTINE SKRODZKI RUSSIAN NEMEC & HOFF, LTD.  
835 McClintock Drive, Second Floor  
Burr Ridge, Illinois 60527-0859  
*DSR@gsrnh.com*





**CERTIFICATE OF SERVICE**

TO: See attached Service List.

I, an attorney under oath, hereby certify under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, that I caused the following documents of the Intervenor, **PROTECTIVE PARKING SERVICE CORPORATION, an Illinois Corporation d/b/a LINCOLN TOWING SERVICE:**

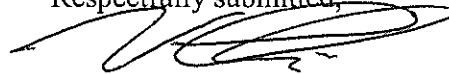
- (1) Notice of Filing
- (2) Notice of Petition
- (3) Certificate of Service
- (4) Service List
- (5) Petition for Leave to Intervene

to be served upon each attorney to whom directed at their respective addresses:

X **Via Electronic Mail**, by transmitting a copy in PDF format to the email addresses listed herein with consent of the recipient where permissible under Ill. S. Ct. Rule 11, before 11:59 P.M. on the **22<sup>nd</sup> day of October, 2018.**

X **Via Federal Express (FedEx)**, standard priority, overnight delivery, by depositing the same in the Fedex drop box location/shipping center, with shipping charges paid by the sender, in a properly addressed, sealed, and secure envelope, at 1 South Sangamon Street, Chicago, IL 60607, Chicago, Illinois 60607, before 8:00 P.M. on the on the **22<sup>nd</sup> day of October, 2018.**

Respectfully submitted,



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Vlad V. Chirica  
PERL & GOODSNYDER, LTD.

Allen R. Perl  
Vlad V. Chirica  
PERL & GOODSNYDER, LTD.  
Attorneys for Intervenor  
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**SERVICE LIST**

**ATTORNEYS FOR APPLICANT:**

**Donald Steven Rothschild**

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835 McClintock Drive, Second Floor  
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*DSR@gsrnh.com*

*VIA ELECTRONIC MAIL ONLY*

**ATTORNEYS FOR STAFF OF THE ICC:**

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**Azeema Akram**

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*VIA ELECTRONIC MAIL ONLY*

**ADMINISTRATIVE LAW JUDGE:**

**Honorable Judge Latrice Kirkland-Montaque**

Chief Administrative Law Judge  
Review & Examination Program  
Illinois Commerce Commission  
160 North LaSalle Street  
Chicago, Illinois 60601  
*lmontaqu@icc.illinois.gov*

*VIA ELECTRONIC MAIL ONLY*

**CLERK OF THE ILLINOIS COMMERCE COMMISSION:**

**Illinois Commerce Commission**

Processing and Information Section  
527 East Capitol Avenue  
Springfield, Illinois 62701

*via FEDEX PRIORITY OVERNIGHT ONLY*

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

In re the matter of: :  
:   
Rendered Services, Inc., :   
Applicant. : 74 RTV-R Sub 15  
: 81440 MC  
Application for a renewal of a Commercial :   
Vehicle Relocator’s License pursuant to Section : Honorable Latrice Kirkland-Montaque  
401 of the Illinois Commercial Relocation of :   
Trespassing Vehicles Law, 625 ILCS 5/18a-401. :

**PETITION FOR LEAVE TO INTERVENE**

**NOW COMES** Intervenor, PROTECTIVE PARKING SERVICE CORPORATION d/b/a LINCOLN TOWING SERVICE, 92 RTV-R, 4882 North Clark Street, Chicago, Illinois 60640 (hereinafter referred to as the “Intervenor”) by and through its attorneys, PERL & GOODSNYDER, LTD., and pursuant to the Illinois Commercial Relocation of Trespassing Vehicles Law, 625 ILCS 5/18a-100, et seq., and Section 200.200 of the Rules of Practice of this Commission, for its **PETITION FOR LEAVE TO INTERVENE** on the Application for a renewal of a Commercial Vehicle Relocator’s License pursuant to Section 401 of the Illinois Commercial Relocation of Trespassing Vehicles Law, 625 ILCS 5/18a-401 (hereinafter referred to as the “Renewal”) filed by RENDERED SERVICES INC. (hereinafter referred to as the “Applicant”), states as follows:

1. RENDERED SERVICES, INC., 74 RTV-R, 3611 South Iron Street, Chicago, Illinois 60609 (hereinafter referred to as the “Applicant”) is a relocater licensed by this Commission.
2. PROTECTIVE PARKING SERVICE CORPORATION d/b/a LINCOLN TOWING SERVICE, 92 RTV-R, 4882 North Clark Street, Chicago, Illinois 60640 (hereinafter referred to as the “Intervenor”) is a relocater licensed by this Commission.

3. Applicant's most recent date of issuance of License # 74 RTV-R was on August 9, 2012, which expired on August 9, 2014.

4. On or about March 28, 2016, this Commission denied the renewal application in the above-captioned matter, and initiated the instant hearing process

5. Intervenor has a vital interest in the fitness of individuals that the Commission licenses to perform relocation towing service, as this industry is highly visible, and the risk of an unfit operator being licensed could adversely impact Intervenor.

6. Upon information and belief, Intervenor contends that Applicant is unfit to receive a relocater's license, to wit:

- (a) Upon information and belief, Applicant has been unlawfully removing Intervenor's signage and replacing them with Applicant's own signage, despite Applicant not having a valid contract to relocate vehicles from such lots, as recently as the past several months;
  - (b) Applicant's unlawful removal of Intervenor's signage has been brought to the Illinois Commerce Commission's attention, including the submission of video surveillance footage evidence depicting such actions;
  - (c) Upon information and belief, Applicant has relocated vehicles lawfully parked with authority from (1) spots that Applicant had no authority to tow vehicles from, or (2) spots on the public way, and towed them to parking spaces in which Applicant had authority to relocate vehicles from. Upon further information and belief, thereafter, Applicant would document the relocation of the motor vehicle from those spaces and not where the vehicles were actually parked;
  - (d) Upon information and belief, according to a FOIA request by NBC News Investigative Reporter(s), motorists had lodged 963 complaints in a two year period against Applicant;
- and

(e) The Staff of the Illinois Commerce Commission confirmed through the Cook County State's Attorney's Office that there has been an ongoing Chicago Police Department investigation into the Applicant's towing practices.


7. Allowing Intervenor to proceed as a party to the Application will be fair, proper and just, and consistent with the purposes of the law governing relocation towing. Particularly under the amended regulatory requirement found at 92 ILAdm. Code Part 1710.22(a)(2)(D) mandating that an Applicant for a relocater's license carry the burden of establishing its fitness by "clear and convincing evidence," participation by all interested or concerned will help ensure that that standard is maintained.

8. Intervenor respectfully submits that petitions of this nature are routinely and ordinarily granted by this Commission.

**WHEREFORE**, Intervenor, PROTECTIVE PARKING SERVICE CORPORATION d/b/a LINCOLN TOWING SERVICE, 92 RTV-R, 4882 North Clark Street, Chicago, Illinois 60640 (heretofore referred to as the "Intervenor") by and through its attorneys, PERL & GOODSNYDER, LTD., respectfully prays that this PETITION FOR LEAVE TO INTERVENE be granted, that Intervenor be allowed to participate as a party in this proceeding and this cause be set for further proceedings at a mutually convenient time.

Respectfully submitted,

Allen R. Perl  
Vlad V. Chirica  
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Corporation d/b/a Lincoln Towing Service