

**PLEASE TAKE NOTICE THAT THE PURPOSE
OF THIS APPLICATION IS TO PUNISH THE ACCUSED
CHRISTOPHER CROWNSHIELD, FOR CONTEMPT OF COURT
AND SAID PUNISHMENT MAY CONSIST
OF A FINE, IMPRISONMENT, OR BOTH, ACCORDING TO LAW.**

**WARNING:
YOUR FAILURE TO APPEAR IN COURT
MAY RESULT IN IMMEDIATE ARREST AND IMPRISONMENT
FOR CONTEMPT OF COURT**

At a Term of the Supreme Court of the State of New York, in and for the County of Clinton, at the Clinton County Courthouse, 137 Margaret Street, Plattsburgh, New York, on the _____ day of _____, 2018

SUPREME COURT: STATE OF NEW YORK
COUNTY OF CLINTON

THE PEOPLE OF THE STATE OF NEW YORK,
By Barbara D. Underwood¹, Attorney General,
Petitioners,
against

CHRISTOPHER CROWNSHIELD,
d/b/a/ Northern Taxi,
Respondent.

**AMENDED
ORDER TO SHOW CAUSE
BRINGING ON MOTION
TO PUNISH FOR
CIVIL AND CRIMINAL CONTEMPT
AND TO AMEND CAPTION**

Index No. 2017-0796
RJI No. 09-1-2017-0248

Upon the annexed Affirmation of Assistant Attorney General Glen Francis Michaels, dated December 21, 2018, with exhibits, and upon all the proceedings heretofore had herein,

Let the Respondent, Christopher Crowningshield, show cause at a Term of the Supreme Court, Clinton County, located at the Clinton County Courthouse, 137 Margaret Street, on the _____ day of December 2018, at 10:00 o'clock in the forenoon that day, or as soon thereafter as counsel can be heard, why an order should not be made:

1. Pursuant to Judiciary Law § 753 and CPLR § 5104, adjudging Respondent Christopher Crowningshield [hereinafter "Respondent"] in civil contempt of court for disobedience to a lawful mandate of the Court and imposing a civil fine against Respondent in the

¹ This case was previously captioned "The People of the State of New York, by Eric T. Schneiderman, Attorney General of the State of New York Petitioners, against Christopher Crowningshield d/b/a/ Northern Taxi, Respondent."

amount of \$250 or more pursuant to Judiciary Law § 773, and further punishing Respondent by incarceration pursuant to Judiciary Law §§ 753, 772 and 774; and

2. Pursuant to Judiciary Law §750(3) adjudging Respondent in criminal contempt of court for disobedience of the Court's lawful mandates, imposing a criminal fine on Respondent pursuant to Judiciary Law § 751(4) of up to \$5,000 for willful disobedience to a lawful mandate of the Supreme Court issued pursuant to Executive Law § 63(12) and imprisoning Respondent pursuant to Judiciary Law §751(1).

3. Pursuant CPLR §§ 8303(a)(6), directing that Respondent pay an additional allowance of \$2,000;

5. Awarding Petitioner the sum of \$100.00 in motion costs pursuant to CPLR § 8202;

6. Authorizing Petitioner, pursuant to CPLR § 2222, to docket as a money judgment any order issued by the Court on this motion fixing the amount of money owed by Respondent, including restitution, fines and motion costs;

7. Granting costs, disbursements and such other relief as may seem just and proper to the Court; and

8. Amending the caption of the proceeding by substituting the name of the current Attorney General of the State of New York, Barbara D. Underwood, for the name Eric. T. Schneiderman, who was Attorney General of the State of New York at the time the underlying proceeding was filed but subsequently resigned office.

SUFFICIENT CAUSE to me appearing therefore

LET service of a copy of this Order and supporting papers on Christopher Crowningshield, 188 Sand Road, Morrisonville, NY 12962 be deemed due and sufficient service hereof.

E N T E R

Date: December ____, 2018

Hon. _____

SUPREME COURT: STATE OF NEW YORK
COUNTY OF CLINTON

THE PEOPLE OF THE STATE OF NEW YORK,

By Barbara D. Underwood¹, Attorney General,
Petitioners,

against

CHRISTOPHER CROWNSHIELD,

d/b/a/ Northern Taxi,
Respondent

AMENDED

AFFIRMATION

**OF GLEN FRANCIS MICHAELS
IN SUPPORT OF**

**MOTION TO HAVE COURT
FIND RESPONDENT IN**

**CIVIL AND CRIMINAL CONTEMPT
AND TO AMEND CAPTION**

Index No. 2017-0796

RJI No. 09-1-2017-0248

Glen Francis Michaels, an attorney duly admitted to practice law in the State of New York,
affirms the following under the penalties of perjury:

Affirmant and Purpose of Affirmation

1. I am an Assistant Attorney General in the office of Barbara D. Underwood, Attorney General of the State of New York, (hereinafter referred to as the "AG" or her office as the "OAG").
2. I am assigned to the AG's Plattsburgh Regional Office
3. The facts set forth in this Affirmation are based upon personal knowledge and information contained in the files of the Plattsburgh Regional Office, and are believed to be true and correct.
4. I submit this Affirmation in support an application by the New York State Attorney General ("NYAG") for an Order to Show Cause bringing on a motion to punish Respondent Christopher Crowningshield (hereinafter "Respondent") for civil and criminal contempt pursuant

¹ This case was previously captioned "The People of the State of New York, by Eric T. Schneiderman, Attorney General, Petitioners, against Christopher Crowningshield d/b/a/ Northern Taxi, Respondent."

to Article 19 of the Judiciary Law, and for an Order pursuant to CPLR §1019 amending the caption of this proceeding to read as captioned above, namely with the name of Barbara D. Underwood, the current Attorney General of the State of New York, substituted for Eric T. Schneiderman, who was Attorney General at the time this proceeding was filed but subsequently resigned.

Respondent and His Business

5. Respondent operates taxi and van transportation services in and around Clinton County New York under the names “Northern Taxi” and “Chris’s Shuttle Service.”

6. On June 13, 2016 Christopher Ray Crowningshield filed a Business Certificate (a “DBA”) for “Northern Taxi” with a business address of 188 Sand Road, Morrisonville, NY 12963. A copy of this certificate is appended hereto to the Petition in this matter. For the convenience of the Court a copy of the Petition is appended hereto as Exhibit A and is referred to hereinafter as the “Petition.”

7. As Northern Taxi Respondent sometimes operated the vehicles he owns but also frequently has leased these vehicles to other individuals, reserving the right to direct these lessees regarding the fares they may charge. See Petition, ¶34 (e) and (f).

8. Respondent and his vehicles are regularly used to transport persons leaving the United States, who have traveled by bus to Plattsburgh and then seek taxicab or van transportation from Plattsburgh to the Canadian border, especially to a foot crossing at the end of Roxham Road in Champlain, New York (hereinafter referred to as “Roxham Road”). See Petition, ¶34.

Investigation, Stipulation, and Consent Order and Judgment

9. In early 2017, the New York State Attorney General, received reports that vulnerable individuals fleeing the United States were being taken advantage of by unscrupulous taxi drivers charging twice to ten times more than the going rate for taxicab transportation, investigated Plattsburgh area taxi operators, including Respondent.

10. The Attorney General had an investigator take rides with Respondent and his lessees from Plattsburgh to Roxham Road, dressed and carrying luggage as if she were fleeing the United States to seek asylum in Canada.

11. During the course of these rides, the Attorney General determined that Respondent and his lessees were charging several times the going rate for taxi transportation and failing to comply with General Business Law (“GBL”) §396-p(1), which requires that taxicab fares be conspicuously posted, so that an unscrupulous driver does not charge more than the prospective rider expects to pay.

12. Accordingly, the Attorney General brought a summary proceeding pursuant to New York Executive Law (“Exec.L”) §63(12) and GBL Art. 22-A to enjoin Respondent from engaging in deceptive, fraudulent, and illegal practices in connection with his taxicab business, and for civil penalties and costs to be paid to the State of New York as authorized by statute. See Petition appended hereto as Exhibit A.

13. Confronted with his own admissions and overwhelming evidence of his illegal behavior, Respondent on May 3, 2017, entered into a Stipulation and Consent (hereinafter the “Stipulation”), a copy of which is appended hereto as Exhibit B.

14. Under the Stipulation, Respondent consented to entry of the Consent Order and Judgment signed by this Court on May 5, 2017 (hereinafter the “Consent Order”). A copy of the Consent Order is appended hereto as Exhibit C.

Terms of the Consent Order

15. Conspicuous Posting of Fares. The Consent Order, *inter alia*, permanently enjoins Respondent from either operating a taxicab – or making available a taxicab for use by another unless that vehicle complies with GBL §386-p(1), that is

unless there is posted in the interior of such vehicle, in a manner legible and conspicuous to passengers, a statement of the rates, fares, or other charges whether

imposed upon the basis of mileage, or fraction thereof, zones or other equivalent measurement and any additional charges for luggage or additional passengers, and if such charges are subject to variation, a statement of the conditions relating to such variation

16. Applicable to Christopher Crowningshield, Individually and However Doing Business. The Consent Order is applicable not only to the business known as "Northern Taxi."

Rather, it specifically provides that

Respondent Christopher Crowningshield individually and doing business as Northern Taxi, and his agents, trustees, servants, employees, successors, heirs and assigns, and any other person under his direction and control, whether acting individually or in concert with others, or through any corporate or other entity or device through which Christopher Crowningshield may now or hereafter act or conduct business (hereinafter collectively referred to as "Respondent"), are bound by the terms of this Consent Order and Judgment

17. Maximum Charge for Vehicle to the Border. The Consent Order also permanently enjoins Respondent from charging more than a specified dollar amount for any number of persons traveling from Plattsburgh to within five miles of the US-Canadian Border. That dollar amount is equal to ten times the maximum fare permitted from time to time by the City of Plattsburgh for travel by taxicab by one person within the borders of such City.

18. Such maximum fare, at the time the Consent Order was issued was \$7.75. However, this maximum fare was raised by the Plattsburgh City Council in April 2018 by \$1.50; so that the new maximum is \$9.25. Accordingly, the Consent Order currently enjoins Respondent or his lessees from charging a group one or more passengers any more than \$92.50 for a vehicle carrying them from Plattsburgh to the Canadian border, regardless of the number of passengers in the group.

19. Record-Keeping, Reporting, and Receipt Requirements. The Consent Order also enjoins Respondent from transporting any passenger for pay unless the driver,

- (i) prior to transporting any passenger shall first orally inform each passenger of the total fare for all persons to be transported to the requested destination and record this quote in a log book,
- (ii) maintains a log of compensation received from all passengers,
- (iii) tenders a receipt to each passenger showing the date of transport, the pickup and drop-off locations, the fare quoted, the actual amount received for the ride from all passengers on the trip, and
- (iv) prior to travel to the border telephones the Plattsburgh Regional Office of the Attorney General at the phone number 518.562.3288 with specified information, including the number of passengers and the total fare being charged.

Under the Consent Order Respondent is required to maintain the records specified above for at least seven years and to make such records available to the Attorney General upon 24 hours written notice.

20. Costs and Penalties. Finally, the Consent Order requires the Attorney General to pay to the Attorney General \$2,500 as costs and penalties. Such amount is payable, according to paragraph 5 of the Stipulation, in amounts of at least \$300 per month on the 15th of each month until paid in full.

Respondent Was Served With and Aware of all the Provisions of the Consent Order

21. A copy of the Consent Order was attached Stipulation signed by Respondent on May 3, 2017, and Respondent at ¶8 thereof acknowledged receipt of it.

22. Moreover, Respondent was served by mail with a copy of signed and filed the Consent order on or about May 16, 2017. See the Affidavit of Service attached hereto as Exhibit D.

23. Most significantly, Respondent was fully aware of the terms of the consent Order because for a time after its entry and service Respondent complied, at least in part, with the provisions of the Consent Order.

24. For example, Respondent paid \$400 (of the total \$2,500 in costs and penalties due) to the Office of the Attorney General on May 17, 2017, and another \$600 on June 22, 2017, although he thereafter ceased to make any further payments. See the receipts attached hereto as Exhibit E.

25. Likewise, Respondent and his lessees initially regularly called the Office or the Attorney General with reports of trips to the US Border. Attached as Exhibit F is the Affidavit of Carol Plumadore, former secretary in the AG's Plattsburgh Regional Office who monitored calls coming in on the line 518.562.3288.

26. Ms Plumadore notes that Respondent and his drivers, shortly before the Consent Order was signed, began reporting trips to the border. Over the next 4 months, Ms Plumadore and other OAG staff received more than 350 calls reporting trips to the border made by Respondent or his vehicles.

27. However, on August 30, 2017, such calls ceased. *Id.* And none have been received since. See Exhibit G, the Affidavit of Lynn Decoteau.

**Respondent Has Subsequently Ignored and Deliberately Violated
the Terms of the Consent Order – Investigator Rides November 13 & 14, 2018**

28. On January 25, 2018, Christopher Ray Crowningshield signed and filed with the Clinton County Clerk a Business Certificate showing him, beginning as of that date, as doing business as "Chris's Shuttle Service" from 188 Sand Road, Morrisonville, NY 12962.

29. November 13 and 14, 2018, investigators from the Office of the Attorney General solicited and received rides from Plattsburgh to Roxham Road in vehicles operated by Northern

Taxi and / or Chris's Shuttle Service. As set forth in more detail below and in the attached affidavits, Respondent failed to comply with the Consent Order.

30. November 13 Ride. As set forth in the Affidavit of Robert Pompey-Goodman, on the afternoon of November 13, 2018, Investigator Pompey-Goodman approached a shuttle bus at the Greyhound bus terminal located on Route 9 just north of the City of Plattsburgh. See Affidavit attached hereto as Exhibit H.

31. The bus bore the name "Northern Taxi." Id. See also the Affidavit of Investigator Justin Rebideau attached hereto as Exhibit I confirming that the shuttle bus bore the business name "Northern Taxi."

32. The investigator asked the driver for a ride to Roxham Road. The driver directed him and another passenger (not an OAG investigator) onto the bus.

33. The driver did not quote Investigator Pompey-Goodman a fare, as required by the Consent Judgment. Nor did he take the passengers immediately to Roxham Road.

34. Instead, the driver took investigator Pompey-Goodman and the other passenger to the home of "his boss" at 188 Sand Road, Morrisonville, the home of Christopher Crowningshield.

35. At that location, the driver consulted with Christopher Crowningshield and put Investigator Pompey-Goodman and the other passenger in a minivan owned by Christopher Crowningshield bearing the business name "Chris's Shuttle Service" on the side and the name "Northern Taxi" on the top (see Rebideau Affidavit).

36. The driver set out from Christopher Crowningshield's home and took Investigator Pompey-Goodman and the other passenger to Roxham Road, where he discharged them near the Canadian border.

37. Along the way, the driver got on the radio with "Chris" and was instructed that the fare be \$100 per person. The driver demanded and received \$100 from each passenger. See

Affidavit of Investigator Pompey-Goodman. This was a violation of the Consent Order, which permitted a maximum fare for all passengers, in total, of \$92.50.

38. The driver did not offer or provide a receipt to Investigator Pompey-Goodman, as required by the Consent Order.

39. There was no poster or other signage in the minivan which transported Investigatory Pompey-Goodman indicating fares to any destination, much less the fare to Roxham Road. This was a failure to comply with GBL §396-p(1) and the Consent Order.

40. Finally, neither the driver nor Respondent Crowningshield telephoned 518.562.3288, the Office of the Attorney General, as required by the Consent Order, to report the ride to the Border. See Affidavit of Lynn Decoteau attached as Exhibit G.

41. November 14 – Ride 1. On November 14, 2018, OAG Investigator Crystal Combs called Northern Taxi from the Super 8 Motel located on Route 9 just north of the City of Plattsburgh and asked for a ride to Roxham Road. She was picked up by a van with New York license plate No. 39051LV, registered to C.R. Crowningshield of 188 Sand Road, Morrisonville, and bearing the name “Chris’s Shuttle Service” on the side and “Northern Taxi” on the bubble on top. See Affidavit of Crystal Combs attached hereto as Exhibit J. See also the Rebideau Affidavit attached as Exhibit I

42. The driver transported Investigator Combs to Roxham Road. There were no rates posted in the van, as required by the Consent Order.

43. The driver of the van, after it was already underway, contacted someone over the phone who indicated that the charge for the trip to the border would be \$100. This is in excess of the \$92.50 maximum permitted by the Consent Order.

44. Investigator Combs paid \$100 to the driver. She was neither offered nor provided with a receipt, as is required by the Consent Order. See Affidavit of Crystal Combs attached.

45. Finally, Respondent failed to telephone, or to have his driver telephone, the Office of the Attorney General to report the ride to the border. See affidavit of Lynn Decoteau attached.

46. November 14 – Ride 2. In the afternoon of November 14, 2018, Investigators Pompey-Goodman and Combs together solicited a ride to Roxham Road from the driver of a Chris's Shuttle Service van parked in the lot of the Plattsburgh Greyhound bus terminal (the Mountain Mart) located on Route 9 just north of the City of Plattsburgh.

47. This van, NY license plate no. 1843TY, was registered to C.R. Crowningshield of 188 Sand Road, Morrisonville, and bore signage on the business name of "Chris's Shuttle Service" on the side and "Northern Taxi" on top. See Affidavits of Investigators Pompey-Goodman, Combs, and Rebideau.

48. In violation of GBL §396-p(1) and the Consent Order, the van did not have conspicuously posted the fare to Roxham Road or any other destination.

49. The two investigators were charged a total of \$100 for the trip to Roxham Road, in excess of the \$92.50 maximum fare permitted by the Consent Order.

50. Neither investigator was proffered a receipt, as required by the Consent Order.

51. Finally, neither the driver nor the Respondent called the Office of the Attorney General to report this ride to the border, as required by the Consent Order.

**Respondent Has Subsequently Ignored and Deliberately Violated
the Terms of the Consent Order – Admissions of Christopher Crowningshield**

52. Admission of Failure to Keep Records. On December 19, 2018, the OAG personally served upon Respondent Christopher Crowningshield a letter demanding that, as required by the terms of the Consent Order, he make available to the AG originals or copies of the records he was required by the Consent Order to keep, e.g., quotes for fares, copies of receipts provided, and logs showing each trip to the border. See the letter of Glen Francis Michaels dated appended hereto as Exhibit K and the Affidavit of Service of Investigator Clint Dumoulin.

53. On the morning of December 20, 2018, Christopher Crowningshield came to the office of the Attorney General and met with me and Investigator Justin Rebideau. See Rebideau Affidavit, Exhibit I, ¶¶12ff.

54. In that meeting, Respondent Crowningshield admitted that he had not kept any of the records required by the Consent Order, explaining that he believed that only “Northern Taxi” was required to keep records but that, since he now was doing business as Chris’s Shuttle Service, “there is no more Northern Taxi.” Id., ¶14.

55. Respondent Crowningshield admitted that he had, until 3 months ago, regularly driven his shuttle bus to the border. Id., ¶19.

56. Respondent Crowningshield denied that his shuttle bus bears the name “Northern Taxi,” despite the evidence to the contrary. See the Reuters photos and testimony of Investigator Rebideau at Exhibit I, ¶¶ 6-8. Note that even the minivans operated by Respondent Crowningshield bear the name “Northern Taxi” on the dome exterior of each. Id., ¶¶ 9-10.

57. Respondent Crowningshield admitted that he owns “Chris’s Shuttle Service.” Id., ¶15.

58. Respondent Crowningshield admitted that he had not paid \$1,500 of the \$2,500 due under the Consent Order, that he had the money to pay this but needed to use it for the maintenance of his vehicles. Id., ¶17.

59. Finally, Respondent Crowningshield admitted that, since August 2017, he had not made any calls to the AG’s office at 518.562.3288 to report trips to the border by his bus or vans. When asked why he had stopped doing so, said that it was because he had “changed the name” of his business and “because nobody else does it.” Id., ¶20.

**PETITIONER IS ENTITLED
TO AN ADJUDICATION OF CIVIL CONTEMPT**

60. Pursuant to Article 19 of the Judiciary Law and Civil Practice law and Rules (“CPLR”) § 5104, a person who is required to obey a lawful court order and refuses or willfully neglects to obey such order may be punished for civil contempt of the court. Judiciary Law § 753(A)(3) provides that a court of record has the power to punish for any “disobedience to a court’s lawful mandate.” The aim of this statute and its correlative punishment is to compensate the injured parties for their losses; it is “... the vindication of a private right ... for the loss of or interference with that right.” McCormick v. Axelrod, 59 N.Y.2d 574, 582-583 (1983); See also State v. Unique Ideas, 44 N.Y.2d 345 (1978).

61. Affirming the lower court, the Appellate Division stated in Kampf v. Worth, 108 A.D.2d 841 (2d Dept. 1985) that a “mere act of disobedience” in opposition to a court’s mandate which “defeats, impairs, impedes or prejudices the rights of a party” is sufficient to sustain a finding of civil contempt “regardless of [the] motive.” Id., at 842 (quoting Great Neck Pennysaver v. Central Nassau Publications, Inc., 65 A.D.2d 616, 616-617 (2d Dept. 1978)); accord, McCormick v. Axelrod, 59 N.Y.2d at 583; Yalkowsky v. Yalkowsky, 93 A.D.2d 834, 835 (2d Dept. 1983).

62. In 2015, the Court of Appeals reiterated prior holdings and again set forth the standards for a finding of civil contempt. “First, ‘it must be determined that a lawful order of the court clearly expressing an unequivocal mandate was in effect.’ Second, ‘[i]t must appear, with reasonable certainty, that the order has been disobeyed.’ Third, ‘the party to be held in contempt must have had knowledge of the court’s order, although it is not necessary that the order actually have been served on the party.’ Fourth, ‘prejudice to the right of a part to the litigation must be demonstrated.’” El-Dehdan v. El-Dehdan, 26 NY3d 19, 29 (2015), citing McCormick v. Axelrod, 59 N.Y.2d at 583. See also Dept. of Env’tl. Protection of New York v. Dept. of Env’tl. Conservation, 70 N.Y. 2d 233, 239-240 (1987).

63. In this case, each of the standards set forth by the Court of Appeals for a finding of civil contempt has been met.

64. Respondent Christopher Crowningshield has voluntarily engaged in actions which have impaired the rights of the people of the State of New York to know ahead of time what fare they will have to pay for a taxi ride. This is especially important for vulnerable individuals whose immigration status is in question and who are leaving the State under duress.

65. The Attorney General, on behalf of such individuals and other citizens of the State of New York brought the underlying proceeding pursuant to Executive Law §63(12) in order to restrain Christopher Crowningshield, whether doing business as Northern Taxi or under any other name, from repeatedly violating Executive Law §396-p(1) regarding the posting of fares and engaging in unfair and deceptive business practices by charging unconscionably high fares to persons not in a position to complain or take legal action against them.

66. In settlement of this legal action, Respondent stipulated not just to a private agreement between himself and the Attorney General but to remedies set forth as orders of this Court: posting fares, quoting them before transporting, limiting the total fare to a reasonable total, providing receipts, keeping records, calling the Attorney General, and paying costs and penalties.

67. Each of the above was carefully designed to protect vulnerable persons in the State of New York, as represented by the Attorney General, from further exploitation. Respondent, however, failed to comply with each and every one of these clearly-mandated, court-ordered remedies. As a result, he charged unknown thousands of dollars in excess of what was fair and reasonable and explicitly limited by Court Order. The rights of the People of the State of New York have been prejudiced thereby.

68. Respondent must be civilly fined. Judiciary Law §773 provides for a minimum fine of \$250. Petitioner requests that the Court take testimony, which will certainly show that

Respondent Crowningshield overcharged vulnerable individuals by a total of thousands, if not tens of thousands of dollars, over the past 18 months.

69. In addition, the Attorney General has had to incur not only the fares paid by her undercover investigators, but also the time and costs of these investigators, her attorneys, and her staff, in bringing to light Respondent's disobedience of the Consent Order.

70. Respondent has willfully refused to pay the \$1,500 still owed the Attorney General under the Consent Order, despite (as noted above) having the funds available to do so.

71. Therefore, Petitioner requests that Respondent be immediately ordered to pay the \$1,500 owed the AG, plus the costs of its investigation, plus an amount to be determined to make whole the People of the State of New York for the overcharges willfully made by Respondent in his transportation business.

72. Even more importantly, Petitioner requests that Respondent Christopher be jailed. From his behavior, as set forth at length above, it is clear that nothing other than a period of incarceration will ensure his compliance with the Consent Order.

73. Judiciary Law § 774(1) subjects one to engages in civil contempt to imprisonment for "a reasonable time, not exceeding six months" even if he has already paid a fine. Petitioner asks the Court to impose upon Respondent Crowningshield a period of imprisonment of at least three months or more.

**PETITIONER IS ENTITLED
TO AN ADJUDICATION OF CRIMINAL CONTEMPT**

74. Pursuant to Judiciary Law § 750(3), a court of record may punish a "[w]ilful disobedience to its lawful mandate" as criminal contempt. The purpose of the statute is to punish offenses which are against the justice system as a whole as opposed to punishing for an offense against an individual. McCormick v. Axelrod, 59 N.Y.2d at 583. The statute protects the dignity of the courts by demanding that society respect court orders. *Id.* Therefore, the penalties imposed

upon a finding of criminal contempt are punitive. In re Dept. of Env'tl. Protection, 70 N.Y.2d 233, 239 (1987); State v. Unique Ideas, 44 N.Y.2d at 349.

75. The same act can be punished as both a civil and criminal contempt. Odingbe v. Dockery, 153 Misc.2d 584, 589 (N.Y. City Civ. Ct. 1992); See also In re Dept. of Env'tl. Protection, 70 N.Y.2d at 239; McCormick v. Axelrod, 59 N.Y.2d at 583. The element which serves to elevate a contempt from civil to criminal is the level of willfulness with which the conduct is carried out. McCormick v. Axelrod, 59 N.Y.2d at 583. To succeed in an action for criminal contempt, the contemnor's disobedience of the court's mandate must have been willful. In re Dept. of Env'tl. Protection, 70 N.Y.2d at 240; accord, McCormick v. Axelrod, 59 N.Y.2d at 583, N.A. Dev. Co. v. Jones, 99 A.D.2d 238, 239 (1st Dept. 1984).

76. As shown above, Respondent has willfully disobeyed a lawful mandate of the Supreme Court. It is no excuse that he began operating under the business name "Chris's Shuttle Service," for two reasons.

77. First, even to a layperson it is abundantly clear that the Consent Order applies beyond "Norther Taxi." The Order specifically states that it applies to "any corporate or other entity or device through which Christopher Crowningshield may now or hereafter act or conduct business."

78. Furthermore, Respondent Crowningshield operated under "Northern Taxi" at least until January 25, 2018, the date on which he first filed a Business Certificate to operate under the name "Chris's Shuttle Service." And by his own admission Respondent Crowningshield never kept the required paperwork, even for Norther Taxi. After August 30, 2017, he ceased complying with the requirement that he report trips to the border by telephone to the AG's office even though he was still doing business as Northern Taxi.

79. Two final points: First, note that, even as late as November 2018, Respondent Crowningshield's vehicles were labeled "Northern Taxi." Second, it was not only that he may have believes that the Order was not applicable to his business under a different name. Rather, part of his reason for ignoring the requirement of telephoning the AG regarding rides to the border was that "nobody else does it." See ¶59 above.

80. Judiciary Law § 751(4) permits the Court to impose a fine of up to \$5,000 for every day a person wilfully disobeys a lawful mandate of the supreme court issued pursuant to Executive Law § 63(12). That is indeed the case with the Consent Order, which was issued in this, an Executive Law §63(12) proceeding by the Attorney General.

81. Judiciary Law § 751(4) provides that "[i]n fixing the amount of the fine, the court shall consider all of the facts and circumstances directly related to the contempt, including, but not limited to: (i) the extent of the wilful defiance of or resistance to the court's mandate, (ii) the amount of gain obtained by the wilful disobedience of the mandate, and (iii) the effect upon the public of the wilful disobedience."

82. Respondent has openly and flagrantly defied every portion of the Consent Order. Failure to punish him for the same would be to invite other transportation companies to emulate Respondent Crowningshield's lucrative, deceptive, and illegal business practices.

83. Respondent has been operating in violation of the Consent Order since at least August 31, 2017, the date when he stopped reporting rides to the border. The two days in which the Attorney General did undercover checks of Respondent's business – November 13 and 14, 2018 – he was willfully out of compliance with all aspects of the Consent Order. Respondent Crowningshield has admitted that he has never complied with the maintenance of records as required by the Consent Order. See ¶54 above. Accordingly, this court is authorized to, and indeed should -- ordered to pay a fine for his criminal contempt of at least \$25,000, if not more.

84. Finally, for his criminal contempt, Respondent should be imprisoned in the Clinton County Jail for a period of thirty (30) days, pursuant to Judiciary Law § 751(1), which authorizes the Court to impose such punishment in addition to authorized fines.

85. Finally, a money judgment in the amount of \$1,800 should be entered against Respondent for the amounts due and owing the Attorney General under the Consent Order as well as for motion costs pursuant to CPLR § 2222.

AMENDMENT OF CAPTION MUST BE PERMITTED

86. CPLR §1019 permits a Court to substitute the name of the incumbent office holder for that of a prior office holder who sued in his or her official capacity. This proceeding was not brought by Eric T. Schneiderman in any capacity but his then official capacity as AG. There is no interest on the part of Mr. Schneiderman in this work not being carried out by his successor in office and no interest adverse to that of Respondent. Therefore, Petitioner requests that the caption be amended and that no notice to former AG Eric Schneiderman be required.

December 21, 2018



GLEN FRANCIS MICHAËLS
Assistant Attorney General

TABLE OF EXHIBITS

<u>Letter</u>	<u>Document</u>
A	Petition filed May 3, 2017, including exhibits
B	Stipulation dated May 3, 2017
C	Consent Order and Judgement May 5, 2017
D	Notice of Entry and Affidavit of Service May 15, 2017
E	Receipts date May 17, 2017 and June 22, 2017
F	Affidavit of Carol Plumadore dated December 19, 2018
G	Affidavit of Lynn Decoteau dated December 19, 2018
H	Affidavit of Robert Pompey-Goodman dated December 20, 2018
I	Affidavit of Justin Rebideau dated December 21, 2018
J	Affidavit of Crystal Combs dated December 19, 2018
K	Letter of Glen Francis Michaels dated December 19, 2018, and Affidavit of Personal Service of Clint Dumoulin of same date

A

SUPREME COURT: STATE OF NEW YORK
COUNTY OF CLINTON

THE PEOPLE OF THE STATE OF NEW YORK,
by ERIC T. SCHNEIDERMAN, Attorney General

Petitioners,

against

**VERIFIED
PETITION**

Index No.
2017-0796

CHRISTOPHER CROWNINGSHIELD,
d/b/a/ Northern Taxi,

Respondent.

The People of the State of New York, by their attorney, Eric T. Schneiderman, Attorney General of the State New York, allege upon information and belief:

INTRODUCTION

1. Petitioners bring this summary proceeding pursuant to New York Executive Law ("Exec.L") §63(12) and New York General Business Law ("GBL") Art. 22-A to enjoin Respondent from engaging in deceptive, fraudulent, and illegal practices in connection with its taxicab business, and for civil penalties and costs to be paid to the State of New York as authorized by statute.

JURISDICTION AND PARTIES

2. Exec.L §63(12) empowers the Attorney General, on behalf of the People of the State of New York, to bring a summary proceeding seeking injunctive relief, restitution, damages, and costs when any person or entity has

engaged in repeated fraudulent or illegal acts or practices or has otherwise engaged in persistent fraud or illegality in conducting its business. GBL §349 prohibits deceptive business practices and empowers the Attorney General to seek injunctive relief when violations occur. GBL §350-d empowers the Attorney General to seek penalties for violations of GBL §349.

3. Christopher Crowningshield is a natural person residing in the Town of Morrisonville, County of Clinton, State of New York who since at least June 2016 does business as “Northern Taxi.” *See* Certificate attached hereto as Exhibit A

4. Respondent admits that he owns vehicles registered as taxicabs in the City of Plattsburgh and that some, but not all, of the persons who lease and operate Respondent’s vehicles, are licensed to operate as taxi drivers in the City of Plattsburgh and do in fact pick up and drop off passengers within the City of Plattsburgh. *See* paragraph 34 below.

5. Respondent also admits that he and his taxicabs pick up and / or drop off passengers in areas of Clinton County outside the City of Plattsburgh. *Id.*

BACKGROUND

6. Since November 2016, according to Respondent, a significant portion of his taxicab business has consisted of picking up passengers from Plattsburgh bus or train stations or hotels / motels and dropping them at that portion of the United

States / Canadian border located at the end of Roxham Road, Town of Champlain, Clinton County, New York (hereinafter referred to as “Roxham Road”). *Id.*

7. Upon information and belief, supported by numerous interviews by US and Canadian media of those persons crossing the border at Roxham Road and of US and Canadian border personnel, the right of many of the persons being dropped off at Roxham Road to remain in the US is unclear; many such persons are fleeing the US in haste in order to seek asylum in Canada; and many are fearful of apprehension by officials of ICE (United States Immigration and Customs Enforcement). *See* articles appended to as Exhibit B hereto.

8. The Attorney General has found that persons whose immigration status in the US is unclear often are the victims of deception, fraud, or other illegal business practices perpetrated by persons who believe – often justifiably – that these victims are unlikely to report their illegal activities to law enforcement or other governmental authorities.

9. In February 2017 the Attorney General became aware from US and Canadian news media and from information received from Plattsburgh residents that some taxicab drivers in the Plattsburgh area were taking advantage of persons fleeing to Canada by charging up to \$300 or possibly even more to bring such persons from the Plattsburgh bus station to Roxham Road. *See* Exhibit B.

10. Upon information and belief, the “going rate” (the usual or customary rate) for transport of one person from the Plattsburgh bus station (located about one mile north of the City of Plattsburgh at 7155 US Route 9 in the Town of Plattsburgh) to Roxham road is between \$50 and \$85. See paragraph 34g below.

11. According to Google Maps, the trip between the bus station and Roxham Road is under 24 miles in length and just under 30 minutes in duration each direction.

APPLICABLE LAW

12. General Business Law §396-p(1) provides in pertinent part as follows:

Every taxicab available for hire in this state shall have posted, in the interior thereof, in a manner legible and conspicuous to passengers, a statement of the rates, fares or other charges whether imposed upon the basis of mileage, or fraction thereof, zones or other equivalent measurement and any additional charges for luggage or additional passengers, and if such charges are subject to variation, a statement of the conditions relating to such variation. No charges greater than those posted shall be made. ...

13. One of the purposes of GBL §396-p is to ensure consumers can verify by consulting the required posting that the fare they are being asked to pay is known ahead of the time they agree to ride with the taxi operator and that the fare is not arbitrarily specified or changed during the course of the ride.

14. Section 243-6 of the Plattsburgh City Code provides in pertinent part that:

All taxis shall meet the following requirements at the time of application and during the time that such vehicle is licensed by the City:

* * *

I. There shall be affixed to the back of the front passenger seat in a conspicuous place a fare zone map and rate schedule in the form and size furnished by the City.

15. GBL §349(a) states in pertinent part that:

(a) Deceptive acts or practices in the conduct of any business, trade or commerce or in the furnishing of any service in this state are hereby declared unlawful.

* * *

(b) Whenever the attorney general shall believe from evidence satisfactory to him that any person, firm, corporation or association or agent or employee thereof has engaged in or is about to engage in any of the acts or practices stated to be unlawful he may bring an action in the name and on behalf of the people of the state of New York to enjoin such unlawful acts or practices and to obtain restitution of any moneys or property obtained directly or indirectly by any such unlawful acts or practices. ...

16. GBL §350-d provides for penalties for violation of GBL §349, stating that:

Any person, firm, corporation or association or agent or employee thereof who engages in any of the acts or practices stated in this article to be unlawful shall be liable to a civil penalty of not more than five thousand dollars for each violation, which shall accrue to the state of New York and may be recovered in a civil action brought by the attorney general.

17. Executive Law §63(12) provides that

Whenever any person shall engage in **repeated** fraudulent or **illegal acts** or otherwise demonstrate **persistent** fraud or **illegality in the carrying on, conducting or transaction of business**, the attorney general may apply, in the name of the people of the state of New York, to the supreme court of the state of New York, on notice of five days, for **an order enjoining the continuance of such business activity or of any fraudulent or illegal acts**, directing **restitution and damages** and, in an appropriate case, cancelling any certificate filed under and by virtue of the provisions of section four hundred forty of the former penal law or section one hundred thirty of the general business law, **and the court may award the relief applied for or so much thereof as it may deem proper.**

* * *

The word "**fraud**" or "**fraudulent**" as used herein shall include any device, scheme or artifice to defraud and **any deception, misrepresentation, concealment, suppression, false pretense, false promise or unconscionable contractual provisions.** The term "**persistent fraud**" or "**illegality**" as used herein shall include **continuance or carrying on of any fraudulent or illegal act or conduct.** The term "**repeated**" as used herein shall include repetition of any separate and distinct fraudulent or illegal act, or conduct which affects more than one person.

* * *

In connection with any such application, **the attorney general is authorized to take proof and make a determination of the relevant facts and to issue subpoenas in accordance with the civil practice law and rules.** Such authorization shall not abate or terminate by reason of any action or proceeding brought by the attorney general under this section.

Emphasis mine.

FACTS

18. Respondent Charges \$200 to "Refugee" for Ride to Border on March 21, 2017. On the afternoon of March 21, 2017, Investigator Michelle Ortiz of the

NYS Attorney General's Office waited at the pick-up / drop off location for Greyhound Bus Lines located at 7155 US Route 9, Plattsburgh, New York. See ¶ 5 of her Affidavit appended hereto as Exhibit C (hereinafter the "Ortiz Affidavit").

19. At approximately 3:25 pm Investigator Ortiz approached a silver colored minivan with a taxicab dome and signage stating Northern Taxi / 534-7166. Ortiz Affidavit ¶ 7.

20. Investigator Ortiz was dressed in multiple layers of clothing and had a suitcase in tow. She spoke in a mixture of broken English and Spanish. She had in hand a note with the words "Roxham Road Champlain" and the phone number 518-534-5166. Ortiz Affidavit ¶¶ 6 & 9.

21. On information and belief, Investigator Ortiz dressed, spoke, and behaved in a manner similar to persons who have traveled from New York City to Plattsburgh by bus, whose right to remain in the United States may be questionable, and who are seeking to quickly cross into Canada to seek asylum in that country. Such persons generally cross into Canada at the end of Roxham Road in the Town of Champlain, Clinton County, New York. That road ends at the Canadian border. Ortiz Affidavit ¶10.

22. When she found that the driver of the Northern taxicab was not in his vehicle, she went into the adjacent store and located the driver, whom she recognized from photographs previously provided her as the Respondent

Christopher Crowningshield. She handed him the note described in paragraph 20 above. Ortiz Affidavit ¶11.

23. They exited the building, and Respondent told Investigator Ortiz that he could take her to Roxham Road. She asked him how much the fare would be but Respondent refused to quote a fare. Instead, he told her that he would have to “find out.” He told her to get in the van, while he walked back into the store. Ortiz Affidavit ¶12.

24. When Respondent Crowningshield returned to the vehicle, he confirmed with Investigator Ortiz that she wanted to go to the border. He got into the driver’s seat and she got into the adjacent front passenger seat. Ortiz Affidavit ¶13.

25. Investigator Ortiz showed Respondent her roll of US bills containing more than \$300 and again asked him the fare for the ride. Again, Respondent refused to immediately answer. Instead, he told Investigator Ortiz that he had to make a call. Ortiz Affidavit ¶¶ 13-14.

26. Respondent started the vehicle and left the bus station. As he did so, he telephoned someone and said “One to Roxham Road; we just left.” Ortiz Affidavit ¶14.

27. Only after the vehicle was underway to its destination and Respondent had completed the above phone call, did he reply to Investigator Ortiz’s inquiry

regarding the fare, saying simply “two.” She inquired what this meant, and he confirmed that the fare he had decided to charge was two hundred dollars (\$200). She then agreed to pay this. Ortiz Affidavit ¶14.

28. During the ride to Roxham Road, Investigator Ortiz visually scanned the interior of the vehicle and determined that no fares, rates, or other charges were conspicuously posted as required by GBL §396-p(1). Ortiz Affidavit ¶15.

29. During the ride Investigator Ortiz also photographed the driver, Respondent Christopher Crowningshield. This photograph is attached to the Ortiz Affidavit.

30. At the end of Roxham Road, Investigator Ortiz hurriedly paid Respondent One Hundred Eighty Dollars (\$180) in cash, mistakenly thinking that she had paid \$200. Ortiz Affidavit ¶17.

31. No Fares Posted on March 27, 2017. On March 27, 2017, at approximately 2:30pm, Investigator Justin Rebideau of the Office of the Attorney General hired a Northern Taxi (dark red van, bearing license plate number 18437TY and bearing the signage of “Northern Taxi”) for a ride from the Super 8 Motel, located just north of US Route 9 and entrance 39 to Interstate 87, to the Champlain Center Mall located just west of the City of Plattsburgh.

32. The driver was a male other than Respondent Christopher Crowningshield. During the approximately 10-minute ride, Investigator Rebideau

visually inspected the interior of van. *See* ¶ 17 of his affidavit appended hereto as Exhibit D.

33. Subpoena Return. Pursuant to an investigative subpoena issued by the Attorney General on March 27, 2017, Respondent Crowningshield met with Assistant Attorney General Glen Michaels, Investigator Justin Rebideau, and Investigator Clint Dumoulin at the Attorney General's Plattsburgh Regional Office located at 43 Durkee Street in Plattsburgh.

34. During his conversation with these three representatives of the Attorney General (which conversation was electronically recorded), Respondent Crowningshield admitted the following:

a. He owns 2 taxicabs which operate in and about the City of Plattsburgh as "Northern Taxi" and has operated them since at least June 2016. *See* Business Certificate furnished by Respondent appended hereto as Exhibit A.

b. He himself drives these cabs and picks up fares both within and outside the City of Plattsburgh.

c. He also leases these cabs to two other individuals, who operate them as Northern Taxi both within and outside the City of Plattsburgh.

d. Neither of Respondent's taxicab vehicles nor he or any of the other operators of the vehicles display the fare schedule and zone map required by the City of Plattsburgh for taxicab operations within the City.

e. Neither Respondent nor either of the operators of his taxicab vehicles have a written schedule of charges or fare for rides outside the City of Plattsburgh. *A fortiori* neither of Respondent's taxicabs have fares or other charges conspicuously posted as required by GBL §396-p.

f. The drivers of Respondent's taxicab vehicles are not permitted to charge fares other than as directed by him. When another driver is unsure of what fare Respondent permits to be charged for a particular trip, that driver will call Respondent, and he will tell the driver what fare to charge.

g. The "going rate" for a trip from the City of Plattsburgh or its Greyhound bus station to the Champlain Border crossing on Interstate 87 is about \$40-50. The "going rate" to the end of Roxham Road in Champlain, which is about ten miles further, is about \$50-60, though some taxi operators, he believes, charge more, perhaps \$75-85.

h. On shorter rides he charges \$1 extra for each person beyond the initial rider. However, for persons requesting to go to Roxham Road, he typically charges much more for each extra rider. One time he charged \$300 to take 3 individuals to Roxham Road, that is, \$100 each. Another time he

charged \$200 for a family of five. He charged more for some individuals than others but would not specify a reason why.

i. He said that he “liked” to get \$100, but later said that he would typically charge somewhere between \$150 and \$200. He did not indicate why he would charge one person more and another less.

j. Whenever he was asked to bring someone to Roxham Road, he would call the U.S. Border Patrol ahead of time to let them know that he was bringing people.

k. He took lots of people to Roxham Road, that his “name was all over the internet” for taking people from Plattsburgh to the border, and that many people wanting to cross the border asked for him.

l. Trips to the border had been frequent for the “past 2 or 3 months.”

m. He made about \$7,000 during the half of 2016 he was in business but that in 2017 Northern Taxi had already grossed about \$15,000, significantly more than half of which was his because he drove more frequently than Northern’s other drivers and people going to the border often asked specifically for him.

**FIRST CAUSE OF ACTION
PURSUANT TO EXECUTIVE LAW §63 (12):
Violation of General Business Law §396-p**

35. At least two Attorney General investigators observed, and Respondent himself admitted, that he and the other drivers of the Northern Taxicabs owned by him do NOT conspicuously display rates, fare, or other charges and have operated this way at least since June 2016.

36. Charging fares which are not conspicuously posited is precisely what is prohibited by GBL §396-p. Respondent and those to whom he leases taxicabs have repeatedly violated the statute.

**SECOND CAUSE OF ACTION
PURSUANT TO EXECUTIVE LAW §63 (12):
Violation of Plattsburgh City Code §243-6(I)**

37. At least two Attorney General investigators observed, and Respondent himself admitted, that he and the other drivers of Northern Taxicabs owned by him do NOT display on the back of the driver's seat (or anywhere else in the taxicab, for that matter) the fare chart and zone map required by the City of Plattsburgh for all cabs authorized to pick up and discharge persons within the City.

38. Respondent and those to whom he leases taxicabs have repeatedly violated this ordinance.

[The remainder of this page has been intentionally left blank.]

THIRD CAUSE OF ACTION
PURSUANT TO EXECUTIVE LAW §63 (12):
Violation of GBL §349

39. Respondent took advantage of a person whom he had reason to believe was in a precarious situation (fleeing the United States to Canada) by repeatedly refusing to quote a fare to her until she was already in the vehicle, on the road with him driving, *en route* to the destination.

40. Without fares posted – so that they can be determined, agreed upon ahead of time, and verified afterward – the general public (and especially those in difficult circumstances) are at the mercy of taxi drivers such as Respondent. Once in the cab and traveling, they have already received services from the driver. If they complain or decline to pay the requested fare, they risk being left off prior to their destination, turned over to law enforcement and / or (as Respondent admits he does prior to leaving) brought to the attention of the Border Patrol or other immigration authorities.

41. Moreover, Respondent admits that he charges more for some consumers than others and cannot articulate a reason why he does so. This is precisely the kind of discrimination prohibited by GBL §396-p(1), requiring them to specify – by conspicuous posting ahead of any ride – the fare to be charged to any and all members of the public.

42. Respondent, by his own admission, has become known over the internet as someone who is willing and able to take to the border those whose right to further reside in the United States may be questionable. He takes advantage of such persons and other vulnerable members of the general public by (i) not complying with GBL §396-p(1), (ii) charging an unconscionably high fare of \$200-300 dollars, as opposed to the going rate of \$50-75, (iii) often charging each person or party going to the border the full fare, instead of following his admittedly customary practice for other routes of charging extra passengers only a dollar or two more, and (iv) failing to specify the fare he will charge until after the person is in the vehicle and already on the way to the destination.

RELIEF

WHEREFORE, Petitioner requests that the Court grant the following relief against Respondent pursuant to Exec.L §63 (12):

- (a) Permanently enjoining Respondent from violating GBL 396-p;
- (b) Permanently enjoining Respondent from violating the provisions of the Code of the City of Plattsburgh in effect from time to time regarding posting of zones and fare charts;
- (c) Permanently enjoining Respondent from charging a total fare for travel to the border which exceeds TEN times the maximum fare permitted from time to time by the City of Plattsburgh for travel by taxicab within the borders of

such City (where “travel to the border” means a ride anywhere within the City or Town of Plattsburgh to any location within five (5) miles of the US-Canadian border; and “total fare” means the fare charged for all such persons traveling in the vehicle);

(d) Enjoining Respondent from operating or leasing any taxicab vehicle unless Respondent (or the driver of the vehicle if other than Respondent):


(i) prior to transporting any passenger for pay (A) orally informs such passenger of the total fare for all persons to be transported to the requested destination, and (ii) records in writing in a log or receipt book (which book maintains a carbon copy of whatever is written therein) the quoted fare;

(ii) prior to discharging such passenger, (A) records in the log or receipt book described in the prior paragraph the full amount of compensation received from all passengers for transport to the requested destination and (B) provides to each such passenger who has tendered payment with an original or copy of a receipt showing the date of transport, the pick-up and drop-off locations, fare quoted prior to the commencement of travel, and the full amount received by the driver from all persons who have been transported to that destination on such ride; and

- (iii) maintains and preserves a true and accurate copy of each quote and receipt given for at least seven (7) years from the date of the ride; and
- (iv) makes a true and accurate copy of each such quote and / or receipt available for inspection by the AG within twenty-four (24) hours after receipt from the AG of a written request for such inspection; and
- (e) Ordering Respondent to pay to the Attorney General penalties and costs of TWO THOUSAND FIVE HUNDRED DOLLARS (\$2,500); and
- (f) Such other and further relief as this Court may deem just and proper.

Dated: May 3, 2017

ERIC T. SCHNEIDERMAN
Attorney General of the State of New York,
Attorney for Petitioners

By: 
Glen Francis Michaels
Assistant Attorney General
Plattsburgh Regional Office
43 Durkee Street, Suite 700
Plattsburgh, NY 12901
Fax (518) 562-3293 [not for service]

VERIFICATION

STATE OF NEW YORK)
)
COUNTY OF CLINTON) SS.:

GLEN FRANCIS MICHAELS, being duly sworn, deposes and says:

I am an Assistant Attorney General in Charge of the Plattsburgh Regional Office of Eric T. Schneiderman, Attorney General of the State of New York, and am duly authorized to make this verification.


I have read the foregoing petition and know the contents thereof, which is to my knowledge true, except as to matters stated to be alleged upon information and belief, and as to those matters, I believe them to be true.

The grounds of my belief as to all matters stated upon information and belief are investigatory materials contained in the files of the Attorney General's office.


Glen Francis Michaels

Sworn to before me this

3rd day of May 2017


Notary Public

Carol J. Plumadore
Notary Public, N.Y.S.
Clinton County 01PL6189117
Expires 06/23/2020



Doc ID: 007376400001 Type: DBA
 Recorded: 06/13/2016 at 10:10:00 AM
 Fee Amt: \$25.00 Page 1 of 1
 Clinton, NY
 John M. Zurlo County Clerk

File # 2016-00011548

Exhibit A

Business Certificate

Legal questions should always be addressed by an attorney.

I HEREBY CERTIFY that I am conducting or transacting business in the State of New York within the County of Clinton under the name or designation

of Northern Taxi

located at 188 Sand Rd, Morrisville NY, 12962

My full name is Christopher Ray Crounshield
 and I reside at 188 Sand Rd, Morrisville NY, 12962

If under 18 years of age, state "I am ___ years of age".

I FURTHER CERTIFY that I am successor in interest to the following person or persons who formerly used this name to conduct or transact business.

Person's name _____

I FURTHER CERTIFY and acknowledge that I have searched the records in the Clinton County Clerk's office and have found no business has the same or similar name and that I hold the County of Clinton harmless from any action thereof.

IN WITNESS WHEREOF, I have this 13 day of June, 2016
 made and signed this certificate.

Chris Crounshield

STATE OF NEW YORK
 COUNTY OF CLINTON

On this 13th day of JUNE 2016, before me, the undersigned, a Notary Public in and for said State, personally appeared CHRIS CROWNSHIELD, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s), on the instrument, the individual(s) or the person upon behalf of which the individual(s) acted, executed the instrument.

STATE OF NEW YORK S.S.
 CLINTON COUNTY CLERKS OFFICE

I do hereby certify that I have compared the foregoing copy with the original thereof And that the same is a true copy of said original

Filed/Recorded in the Office on JUN 13 2016

Susan J. Ralston Deputy Clerk
 Dated JUN 13 2016

Susan J. Ralston
 (Signature and office of individual taking acknowledgment)

Susan J. Ralston
 Notary Public State of NY
 Qualified in Clinton County
 Comm. Expires Jan. 6, 2018

Exhibit B-1

IN UPSTATE NEW YORK, TAXI DRIVERS ARE MAKING A FORTUNE DRIVING DESPERATE REFUGEE CLAIMANTS CLOSE TO THE CANADIAN BORDER. MANY ARE PAYING THOUSANDS OF DOLLARS FOR A HALF-HOUR RIDE.

'Bandit' drivers exploiting flight from crackdown

Vancouver Sun 18 Feb 2017 *GRAEME HAMILTON National Post ghamilton@ postmedia.com*
Twitter.com/grayhamilton

PEOPLE WILL PAY ANY AMOUNT OF MONEY TO GET THE FREEDOM THEY'RE LOOKING FOR

MONTREAL• When the calls come in to taxi companies in Plattsburgh, N.Y., the person on the other end is never very forthcoming. They need a cab to get some people to the Canadian border, but not the main crossing. Sometimes the fare will be waiting at a motel. Other times it's the airport or the bus station.

For the passengers, the half-hour ride is the final stage in a traumatic journey. In many cases they have fled homelands ravaged by war — Syria, Sudan, Iraq, Yemen. With an uncertain climate in the United States, they have chosen Canada as a final destination.

But according to Canadian lawyers and American taxi operators, the refugees remain vulnerable to exploitation even after landing in the United States.

Montreal immigration lawyer Stéphane Handfield refers to the smugglers who arrange transport to the border as “bandits,” charging \$1,000 a head to drive people from New York City.

And the final leg is usually left to taxi drivers who in some cases will charge another \$300 to drop people within walking distance of the border.

Cabbies tell stories of refugees abandoned by the road, kilometres from the border, after they refused to pay an unscrupulous driver an extra sum.

“These people are fleeing, they are ready to do anything to avoid being returned to their countries because they are afraid, and they are charged \$300 for a 30-minute ride,” Handfield said.

Statistics from the Canada Border Services Agency show a sharp increase in the number of refugee claimants arriving at Quebec's land border in recent months.

From Nov. 1 to Jan. 31, there were 1,413 such claims; during the corresponding period a year earlier, there were just 331.

Christian Gaudet, a dispatcher for City Taxi, said in an interview that there has been a “big-time” increase in the number of calls seeking to get to two spots — one in New York and one in Vermont — where it’s easy to walk across the border.

He said City Taxi is a legitimate firm that charges set rates and doesn’t gouge the customers. But he can’t vouch for independent taxi operators or for the “runners” who bring people north to Plattsburgh.

“A lot of them get ripped off, gouged a lot of money by these runners,” he said of the refugees. “People will pay any amount of money to get the freedom they’re looking for, and if there’s any threat of any authority, that scares them too.”

Chris, a driver with Northern Taxi in Plattsburgh who did not want to give his last name, declined to disclose how much he charges but did not contest the \$300 figure reported by Handfield.

“I picked up a mother, a father and a baby in the middle of the road up there, because (another taxi driver) wouldn’t take them the rest of the way,” he said.

Chris was headed to the border with a fare of his own, so he stopped to pick them up. He gave the stranded family what he considered a deal, charging \$50.

Another Plattsburgh taxi dispatcher who did not want to give his name said passengers are often petrified. “We brought some people up there from Yemen, and he told my driver if they sent him back to his country, they would kill him,” he said.

Some people take advantage of that fear.

“They get them on the highway and say, ‘Look it costs this much.’ They’ll pay it. The driver doesn’t care if they take every penny they have,” he said.

“Some clients explained they were taken in hand in the country of origin, and that it cost them about US\$10,000 for the voyage,” Handfield said.

“Others explained that there is a network of taxi drivers in the New York City region who ask for US\$1,000 per head to bring them within a kilometre of the Canadian border.”

One night in December when he was the immigration lawyer on call for legal aid, Handfield got a call about a man from Eritrea who was making a refugee claim. The

RCMP had picked him up at 3 a. m. walking along the highway near the Lacolle border crossing, about 50 kilometres south of Montreal.

“He was wearing running shoes, not dressed for the weather. He was freezing, and he thought he was going to walk to Montreal. If the police hadn’t found him, he would have died,” Handfield said.

Gaudet of City Taxi said that, as of Thursday, he has started refusing calls seeking to get to an illicit border crossing.

“I’m not feeling good about sending cabs to pick people up and drop them off in the middle of nowhere. That’s just not right,” he said. “I can’t have people coming back on me because somebody died in the middle of the woods somewhere. It’s just too sketchy.”

[\(http://digital.vpr.net/\)](http://digital.vpr.net/)

Exhibit B-2

Vermont Public Radio, March 2, 2017



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[VPR News \(/programs/vpr-news\)](#)

As More Asylum-Seekers Flee To Canada, Taxi Rides To The Border Raise Red Flags

By [KATHLEEN MASTERSON \(/PEOPLE/KATHLEEN-MASTERSON\)](#) • MAR 2, 2017

🐦 [Tweet \(https://twitter.com/intent/tweet?url=http%3A%2F%2Fwww.timurl.com%2Fextvdr&text=As%20More%20Asylum-Seekers%20Flee%20To%20Canada%2C%20Taxi%20Rides%20To%20The%20Border%20Raise%20Red%20Flags\)](#)

f [Share \(https://facebook.com/sharer.php?u=http%3A%2F%2Fwww.timurl.com%2Fextvdr&t=As%20More%20Asylum-Seekers%20Flee%20To%20Canada%2C%20Taxi%20Rides%20To%20The%20Border%20Raise%20Red%20Flags\)](#)

g+ [Google+ \(https://plus.google.com/share?url=http%3A%2F%2Fwww.timurl.com%2Fextvdr\)](#)

✉ [Email \(mailto:subject=As%20More%20Asylum-Seekers%20Flee%20To%20Canada%2C%20Taxi%20Rides%20To%20The%20Border%20Raise%20Red%20Flags&body=http%3A%2F%2Fwww.timurl.com%2Fextvdr\)](#)



http://mediad.publicbroadcasting.net/p/vpr/files/styles/x_large/public/201703/taxi-vpr-masterson-03022017.jpg

This Greyhound stop in Plattsburg, N.Y., is the last stop before the Canadian border. Cab drivers wait here to pick up fares, which often include asylum-seekers looking to illegally walk into Canada.

KATHLEEN MASTERSON / VPR

Thank You
For Your Support!

VPR

Listen

4:13

**SIMPLIFY
YOUR
SUPPORT.**

BECOME A SUSTAINING MEMBER



BE BRAVE. ASK QUESTIONS.

As high volumes of migrants flee the United States to apply for asylum in Canada, one popular route into Quebec is just west of Lake Champlain. To get to the snowy illegal crossing, many are calling a cab.

But there's a catch: Some of those cabbies are coordinating with U.S. Border Patrol, and that practice has some civil liberties advocates concerned.

For most people looking to apply for asylum in Canada, it's not as simple as showing up at a checkpoint. That's because an agreement between the two countries says if an asylum-seeker is already in the United States, he or she cannot then apply for asylum in Canada.

So many are walking across the border illegally (<http://digital.vpr.net/post/some-immigrants-flee-us-knowingly-walking-police-arrest-canada>) between checkpoints.

Plattsburgh, New York, is about 25 miles south of the border. It's the last Greyhound stop before the border checkpoint. It's also the last place to grab a cab.

But if you do call a cab, someone else could be alerted, too:

"When the call comes in, we contact Border Patrol; we say, 'Hey, we got a call, it's going to this location, here's our ETA to that location,'" one Plattsburgh cab company owner explains. He has asked to remain anonymous because he doesn't want any trouble with authorities.

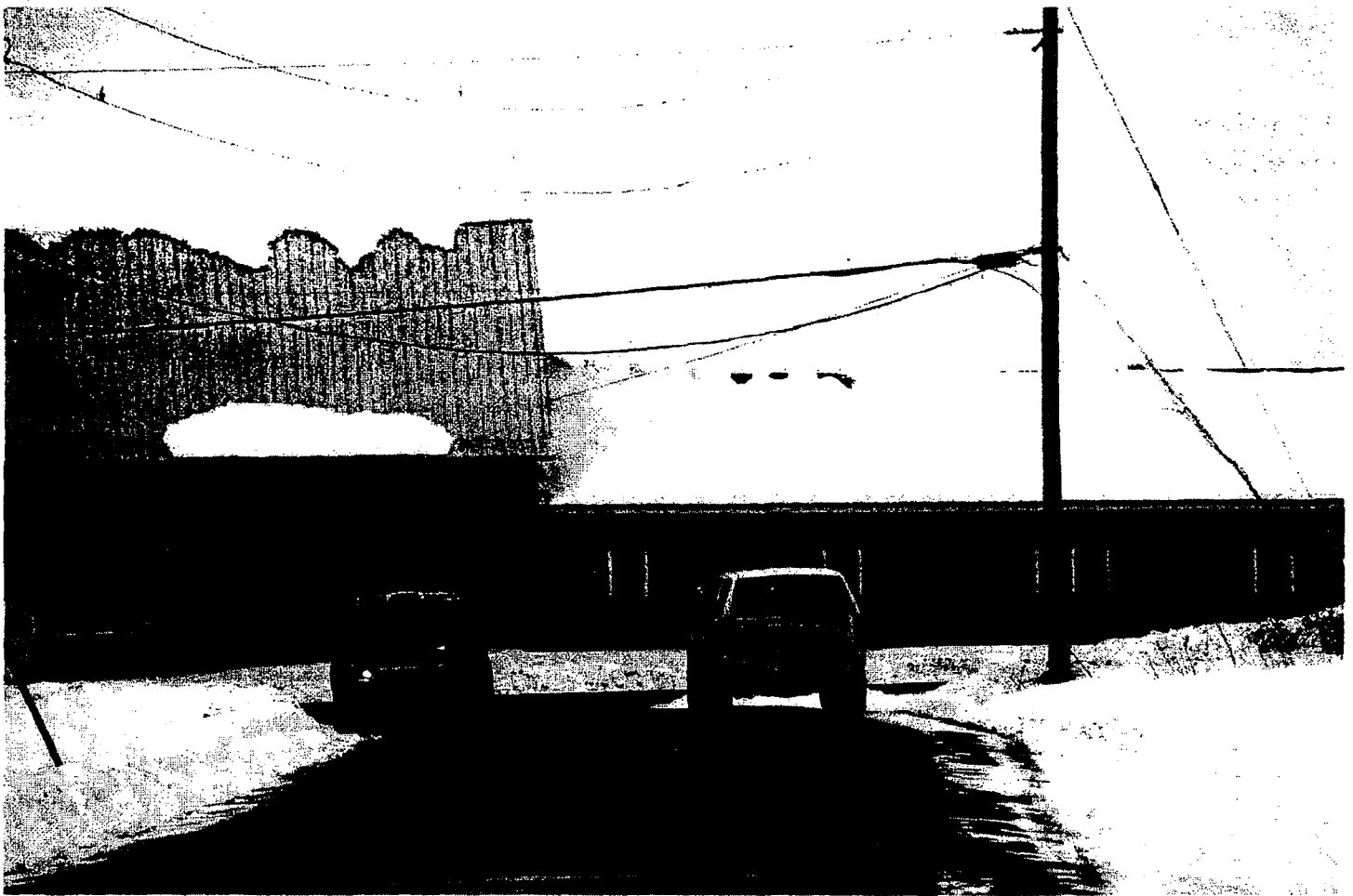
Word-of-mouth protocol

He says he bought into the taxi business in October, and the first time he dropped someone off at a rural road that dead ends at the Canadian border "then immediately, we got a call from Border Patrol say, 'Hey, this is protocol,' and from that point on we've always followed protocol."

But Michael Estrella with U.S. Border Patrol says, "there's no requirement for a cab company to check-in with Border Patrol as to their activities."

Yet Dylan, a driver with Northern Taxi, also said it was his company's policy to call U.S. Border Patrol when they get a request for drop-off at a known illegal border crossing location.

"We usually call Border Patrol, U.S. Customs, on our side ... and they usually meet me there to check them out," he says.



http://medlad.publicbroadcasting.net/p/vpr/files/styles/x_large/public/201703/borderpatrol-vpr-masterson-20170302.jpg

A U.S. Border Patrol agent pulls over a cab on a road popular with people seeking to walk illegally into Canada. After reviewing the paperwork of the passenger, he lets her and her baby go. Shortly thereafter, she crosses the border, knowingly walking into arrest by Canadian police.

CREDIT KATHLEEN MASTERSON / VPR

Estrella wouldn't comment further on how taxi companies might be under the impression that this protocol is required or encouraged.

All he would say is that U.S. Border Patrol does "get help from the community in various ways," but wouldn't say whether taxi companies are among those community members who call-in.

"I'm not going to get into a specific persons or person who is contacting us," Estrella says. "They're doing it as a service to themselves and the rest of their community."

Profiling by destination

James Lyall, the director of the Vermont chapter of the American Civil Liberties Union, says the practice of taxi drivers alerting authorities could have real civil rights implications.

"It's not the job of the cabbie to interrogate people, or assume anything about those people," says Lyall. "It's certainly not their job to do the job of the Border Patrol for them. And they can't be required to do the job of the Border Patrol by the Border Patrol."

Lyall says that if asylum-seekers learn that requesting a cab ride to a certain location may result in being detained, "people are very likely to take greater risks, put themselves in greater danger to avoid the Border Patrol just as they do crossing the southwest border."

"It's not the job of the cabbie to interrogate people, or assume anything about those people ... It's certainly not their job to do the job of the Border Patrol for them." - James Lyall, director of the ACLU of Vermont

Within 100 miles of the border, U.S. Border Patrol can stop people who they have reasonable suspicion are in violation of immigration status. But Lyall says he isn't clear that driving to the border would count as reasonable suspicion.

"An awful lot of vehicles go to the border. And courts have said that you can't base reasonable suspicion on a characteristics that would apply to large number of valid or lawful actions," says Lyall.

The cab drivers we talked to are taking people to a known illegal crossing location in the middle of the woods. But going to the border itself is not an illegal act. It's only once a person walks across the border outside of an official checkpoint that a person can be arrested.

To be clear, if U.S. Border Patrol stops a taxi and the passengers have paperwork showing they are in the U.S. legally — say they have a tourist visa, or perhaps they are in the process of seeking asylum status here — then U.S. Border Patrol cannot detain them. That's even if they are about to walk illegally into Canada.

Desperate to reach Canadian soil

But some asylum-seekers don't have legal status in the United States - and they can be arrested by U.S. Border Patrol before they reach Canadian soil.

The Plattsburgh cab company who asked to remain anonymous says he witnessed such an arrest last week, and it changed his mind about the so-called protocol of alerting authorities.



http://mediad.publicbroadcasting.net/p/vpr/files/styles/x_large/public/201703/bordercam-vpr-masterson-20170302.jpg

On the U.S side, cameras and other sensory technology guard the border at the dead end of a popular illegal crossing in the woods.

CREDIT KATHLEEN MASTERSON / VPR

He says he was dropping off a woman from Haiti. Years ago, she had fled to the U.S. seeking political asylum and now has a young son who was born here.

Her visa had expired, and before the taxi reached the Canada border, she was arrested by U.S. Border Patrol.

The cab driver says the Border Patrol agent said she would likely be deported back to Haiti, and her son would likely be put into foster care in the United States.

The cab owner says after witnessing this, he changed his company's protocol. Now, the dispatch alerts Canadian authorities when they get a border run request.

Then, he said, the passengers can be arrested in Canada, where they have a shot at applying for asylum.

This report comes from the New England News Collaborative (<http://nenc.news/>): Eight public media companies coming together to tell the story of a changing region, with support from the Corporation for Public Broadcasting.

TAGS: IMMIGRATION (/TERM/IMMIGRATION) REFUGEES (/TERM/REFUGEES) VPR NEWS (/TERM/VPR-NEWS-1)

NEW YORK (/TERM/NEW-YORK)

NEW ENGLAND NEWS COLLABORATIVE (/TERM/NEW-ENGLAND-NEWS-COLLABORATIVE) CANADA (/TERM/CANADA)

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🐦 Tweet (<http://twitter.com/intent/tweet?url=http%3A%2F%2Fwww.tinyurl.com%2Fzxtvds&text=As%20More%20Asylum-Seekers%20Flee%20To%20Canada%2C%20Taxi%20Rides%20To%20The%20Border%20Raise%20Red%20Flags>)

f Share (<http://facebook.com/sharer.php?u=http%3A%2F%2Fwww.tinyurl.com%2Fzxtvds&t=As%20More%20Asylum-Seekers%20Flee%20To%20Canada%2C%20Taxi%20Rides%20To%20The%20Border%20Raise%20Red%20Flags>)

g+ Google+ (<https://plus.google.com/share?url=http%3A%2F%2Fwww.tinyurl.com%2Fzxtvds>)

✉ Email (<mailto:?subject=As%20More%20Asylum-Seekers%20Flee%20To%20Canada%2C%20Taxi%20Rides%20To%20The%20Border%20Raise%20Red%20Flags&body=http%3A%2F%2Fwww.tinyurl.com%2Fzxtvds>)

http://plus.lapresse.ca/screens/d5e6966f-bc11-435f-9abc-d1832e1e9c30|_0.html

February 16, 2017

Translated from French by Google

CLANDESTINE CROSSINGS AT THE CANADIAN BORDER A WELL ORGANIZED SYSTEM

Migrants who enter Canada illegally in Montérégie do not arrive at the border by themselves: their journey is coordinated by well-paid actors who leave nothing to chance, La Presse learned.

NICOLAS BÉRUBÉ THE PRESS

PLATTSBURGH - The bus from New York appeared before dawn in Plattsburgh yesterday morning. He stopped at the little station of the city, and some passengers went down.

Among them, Omar, a puny Yemenite of 31 years wearing a coat with a hood over his head and earphones to the ears. Omar jumped into a gray taxi that had stood against the bus when he arrived.

Forty-five minutes and 40 kilometers away, the taxi dropped Omar at the end of Roxham Road, a remote road on the border between the United States and Canada, the clandestine passage most frequented by migrants entering Montérégie .

"I want to go to Canada to apply for refugee status," said Omar, nervous, at La Presse, while US border officers who patrolled the area often consulted his passport. I have a bachelor's degree in marketing. In Canada, there is security. I want to go to Toronto to make my life, even though I do not know anyone. "

Omar was shivering, not just because it was cold. "I'm afraid," he whispered.

On the Canadian side, RCMP officers were shouting to him that it was illegal to enter the country and that he would be arrested. With his passport in his pocket, Omar began to move into the snow and entered Canada, where RCMP officers handcuffed him.

Images of families of migrants arriving in Montérégie show chaotic scenes of human distress. However, these migrants do not reach the border by themselves: their

journey is coordinated by well-paid "facilitators" who leave nothing to chance, it has been learned.

Yesterday morning, the same gray taxi from the Northern Taxi company that took Omar back to the illegal crossing point less than two hours later. This time, he was carrying a family of four: a woman and three children, who said they were coming from Saudi Arabia. With his arm, the driver discreetly indicated to the group where to pass in the snow to reach Canada, to 10 meters of there.

"I take people to where they want to go," La Presse told the driver, who simply called himself Chris, in a telephone interview yesterday afternoon. I'm not the only one coming here. What they do next, it does not concern me, "he said, adding that he was going" almost every day "on Roxham Road for some time.

According to someone who does not want to be identified, a driver can ask for up to US \$ 300 to transport the migrants from Plattsburgh to this clandestine crossing point, which can be completed several times in the same front -midday. Drivers often call US border agents to warn them that they are depositing a client - often helpless and disoriented - on Roxham Road, to have a good relationship with them.

Leaving a person near the border knowing full well that she is going to enter Canada illegally "is not illegal in the United States, but it is morally questionable," says our source.

Migrants often arrive from Boston, New York or Washington, and enter the United States through tourist or student visas, which can cost up to \$ 1,500. As we have seen, most migrants entering Canada know very little English and are unable to answer the most rudimentary questions.

Yet, their journey - often the same - is planned by one or more people who know the territory well. A paper found in the snow yesterday at the underground passage on Roxham Road offers a striking example.

On the handwritten note likely fallen from a migrant's pocket, one can read the name of the airport LaGuardia of New York, the address of the bus station of New York, the address of the bus station Of Plattsburgh with the name "Dahkent Donats", for Dunkin Donuts - the restaurant of the station. The name and full address of Roxham Road, as well as the telephone number of the small, independent taxi company, Northern Taxi, are often read, as are the frequent cargoes of migrants.

Several telephone numbers related to people near Atlanta, Georgia, and Toronto, Ontario are also listed. At one Atlanta cell phone number, the second of the list after the taxi number, a man who responded in impeccable English to La Presse yesterday hung up after listening to our questions, and no longer answered To subsequent appeals.

We dialed the other numbers yesterday, but the people who joined, who spoke bad English, said they did not understand why their number was on this paper.

As for Omar, he says he lived in Saudi Arabia before deciding to enter Canada through the United States. Canada was a logical destination, he said.

"I can not go back to Yemen because of the war. I spent several years in Saudi Arabia, but you will never have legal status, even after having lived there for 50 years. It's impossible to make a living there. "

According to the UN, "civilians in Yemen have suffered unsustainably for years because of several overlapping simultaneous armed conflicts. "Yemeni civilians are victims of attacks on civilians in public places, medical and school facilities, and recruiting children to become soldiers.

A CONSTANT FLOW

Illegal migrants arrive every day in Canada. La Presse saw it during a visit Monday in Hemmingford, Montérégie. Several migrants crossed the border illegally to be arrested by RCMP officers stationed day and night along the border. Migrants immediately apply for refugee status, which they often would not be able to do if they presented themselves at a customs post. This gives rise to confused and often tense moments.

READY TO DO ANYTHING TO FLEE THE UNITED STATES FROM TRUMP
CBC journalist Nick Purdon helped a Somali refugee who was completely refrigerated Saturday at the Canada-US border as part of a report released yesterday by the state-run television station. The young Mohamed had just walked for 21 hours without stopping at a temperature of -17 °C, when he crossed the crew of CBC around 4:30 on Saturday morning. " I have a problem. The United States is the problem now, "said the Somali refugee to the reporter. That night, 26 other refugees from the United States sought refugee status in Emerson, a Manitoba village on the border, according to CBC. More refugees are trying to cross the border illegally to

travel to Canada since the election of Donald Trump, a dangerous venture in the middle of winter. A Ghanaian refugee had to have all his fingers and a toe amputated last month in Manitoba.

- Louis-Samuel Perron, La Presse

Exhibit C

SUPREME COURT: STATE OF NEW YORK
COUNTY OF CLINTON

THE PEOPLE OF THE STATE OF NEW YORK,
by ERIC T. SCHNEIDERMAN, Attorney General

Affidavit

Index No. 2017-0796

Petitioners, against

CHRISTOPHER CROWNSHIELD,
d/b/a/ Northern Taxi,

Respondent.

Michelle Ortiz, being duly sworn deposes and says:

1. I am an investigator employed by the Office of the New York State Attorney General Eric T. Schneiderman.
2. The facts set forth in this affidavit are the results of an undercover investigation I performed in the course of my duties.
3. All statements, unless otherwise noted, are based upon my personal knowledge and observation.
4. On March 21 and 22, 2017, I participated in an undercover investigation into taxi companies operating in the Plattsburgh, New York, area.
5. On the afternoon of March 21, 2017, I was dropped off by other investigators from the Office of the Attorney General at the 7155 US Route 9, Plattsburgh, New York. This is a Mobil gas station with a Dunkin Donuts and "Mountain Mart" convenience store at which one can purchase bus tickets. Greyhound busses pick up and drop off passengers in the parking lot daily.

6. I was dressed in a layers with a shawl that covered my head and upper body and had a suitcase in tow.

7. At approximately 3:40 pm I located a silver colored minivan with a taxicab dome and signage stating "Northern Taxi / 534-7166."

8. The driver was not present, therefore I went back into the store and located who the driver was, as we walked out I handed the driver of the taxi van a note with the words "Roxham Road Champlain" and the phone number "518-534-5166", the phone number of Northern Taxi. The driver confirmed it was his number on the note.

9. Although I am fluent in English, I spoke only in Spanish and in broken English.

10. Upon information and belief, based upon articles in reputable media, I fit the profile of persons whose legal status in the United States is unclear who have been fleeing this country for Canada by traveling from NYC to Plattsburgh by bus and going to a US-Canadian border crossing which is not a legal port of entry into Canada, however persons seeking asylum to Canada there after cross on foot at the end of Roxham Road, in the Town of Champlain, Clinton County, New York, approximately 20 steps where Roxham Road dead ends at the Canadian border.

11. I recognized the driver of the Northern Taxi silver minivan from news media photographs and video clips as Respondent in this proceeding, Christopher Crowningshield.

12. After the driver confirmed he could take me where I wanted to go, I asked how much and he responded he would find out. The Respondent advised me to get in the van as he walked back into the store to show the note to someone inside the store. I loaded my luggage through the side middle door and waited for the driver to return.

13. Respondent returned to the vehicle and entered the driver side and we confirmed again that I was going to the border and I got into the front passenger seat. I showed him I had

money to pay and I pulled out a large roll of US currency containing more than three hundred dollars (\$300), so that it was in view of Respondent.

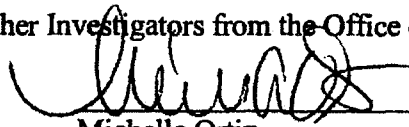
14. I asked the price again and he had to make a call, he called as we were exiting the Mobil station parking lot (approximately 3:47 pm) and said "One to Roxham Road, we just left", when he got off the phone he told me that the fare would be "two" and then clarified two hundred dollars (\$200). I agreed to pay him the quoted price.

15. As he was driving, I visually scanned the interior of the vehicle and quickly determined that there were no rates or fares posted inside the vehicle.

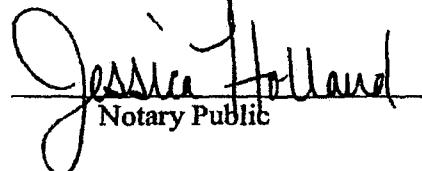
16. During the approximately 30-minute ride to Roxham Road, I further inspected the interior of the vehicle and photographed Respondent as he drove. That photograph is attached to this Affidavit as Exhibit QQQ.

17. When the vehicle reached the end of Roxham Road, I quickly paid Respondent what I thought was \$200 in \$20 bills, although subsequently I realized that I had miscounted and that I had actually given him only \$180. The Respondent drove away immediately.

18. After I exited the vehicle, I was immediately greeted by Canadian Border Patrol personnel and within less than one minute the U.S. Border Patrol. When the Respondent was clear from my sight I advised all Border Patrol officers present both U.S. and Canadian who I work for and our mission. I was picked up by other Investigators from the Office of the Attorney General.


Michelle Ortiz

Sworn to before me this

13 day of April 2017

Notary Public

JESSICA HOLLAND
Notary Public - State of New York
No. 01HO6354041
Qualified in Monroe County
My Commission Expires on FEBRUARY 6, 2021

STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

PEOPLE OF THE STATE OF NEW YORK, by
ERIC T. SCHNEIDERMAN, Attorney General of the
State of New York,

-In the Matter Of-

AFFIDAVIT

Index No. 2017-0796

CHRISTOPHER CROWNSHIELD
d/b/a NORTHERN TAXI

STATE OF NEW YORK)
COUNTY OF CLINTON) ss.:

Justin E. Rebideau, being duly sworn, deposes and says:

1. I am an Investigator employed by the Office of the New York State Attorney General Eric T. Schneiderman.
2. The facts set forth in this affidavit are the results of an undercover investigation I performed in the course of my job duties.
3. All statements are based upon my personal knowledge and investigation.
4. In March of 2017, I was made aware of possible price gouging regarding local taxi companies in the Plattsburgh area providing rides to passengers without the appropriate signage conspicuously posted in their taxi clearly indicating a statement of rates, fares, or other charges whether imposed upon the basis of mileage, the amount of passengers, zones designated by geographic area, or any additional charges that may occur as a result of luggage or additional passengers, including the subject of those variations, as well as the conditions in which they occur.
5. During this same time, I was also made aware that this lack of conspicuously posted signage is in violation of New York General Business Law § 396-p.
6. On March 27, 2017 at approximately 1:57pm I contacted Northern Taxi via cell phone at their known business phone number of 518-534-5166 to arrange for a ride from the

Super 8 Motel (7129 Route 9 North, Plattsburgh, NY 12901) to Gander Mountain (Champlain Centre, 60 Smithfield Blvd, Plattsburgh, NY 12901).

7. I spoke with a male individual on that phone call whom I believe to be the owner of the business, Christopher Crowningshield d/b/a Northern Taxi.

8. Regarding my request to be picked up from the Super 8 Motel and brought to the mall, Mr. Crowningshield stated "Okay I will send one there" and that he was "Not really sure" on how long of a wait it would be before pickup could be executed.

9. I stated "Okay thank you" and the call was terminated at that time.

10. At approximately 2:23pm I placed a follow up call to Northern Taxi via cell phone at their known business phone number of 518-534-5166, as I had not been picked up yet.

11. I again spoke with the male individual whom I believe to be the owner of the business, Christopher Crowningshield d/b/a Northern Taxi, on that phone call.

12. Mr. Crowningshield confirmed his taxi was on the way to my location.

13. At approximately 2:29pm I was picked up at the Super 8 Motel by a Northern Taxi, dark red in color, van in body style, with white lettering on the side which stated "Northern Taxi", with the phone number displayed as "534-5166", bearing license plate number 18437TY.

14. The driver was not Christopher Crowningshield.

15. The driver did not identify himself, had no identifying articles of clothing on, such as a nametag, and was seated the duration of the time I had interaction with him. I further described the driver as a white male, approximately 25 years of age, weighing approximately 225 pounds, and having brown curly hair.

16. Upon entering the taxi, I rode in the front passenger seat. The driver gave me no direction in which area of the taxi I should sit and/or ride.

17. In the area of the taxi in which I was sitting, I observed no conspicuously posted signage (see Exhibit A and Exhibit B attached) indicating statement of rates, fares, or other

charges whether imposed upon the basis of mileage, the amount of passengers, zones designated by geographic area, or any additional charges that may occur as a result of luggage or additional passengers, including the subject of those variations, as well as the conditions in which they occur.

18. At approximately 2:40pm we arrived at the desired drop off location of Gander Mountain in the mall.

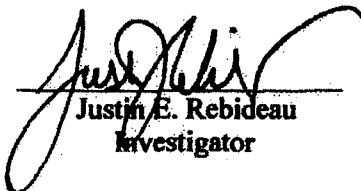
19. The driver of the taxi indicated the fare for the ride would be \$10.00.

20. I paid the driver \$10.00, exited the taxi, and walked into Gander Mountain.

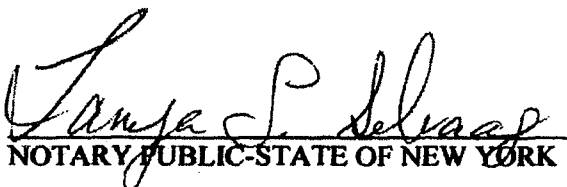
21. I was not provided with a receipt for this transaction.

22. The above transaction and conversations were recorded using a covert audio recording device and photographs were taken using a covert photographic device.

Date: March 30, 2017

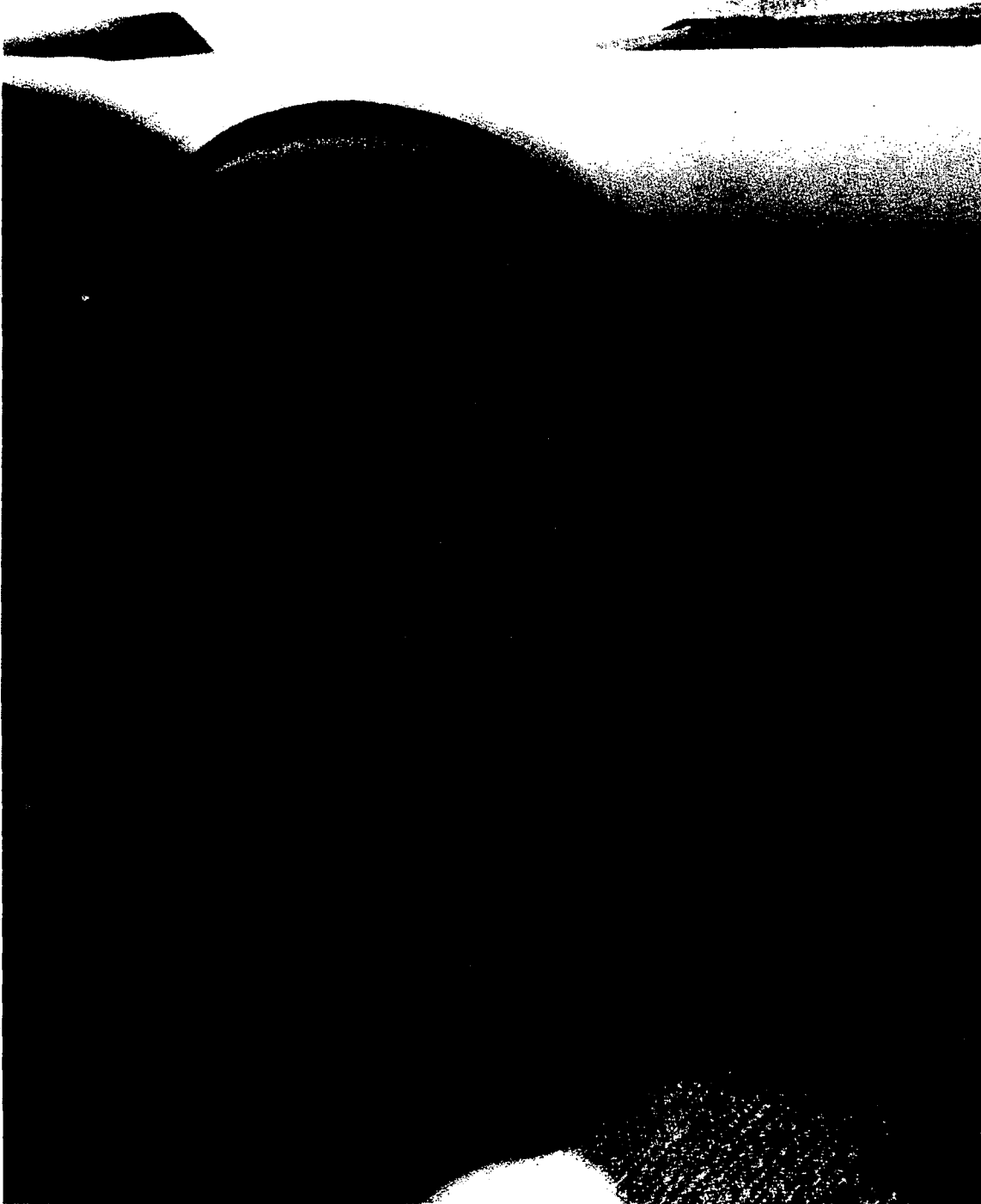

Justin E. Rebideau
Investigator

Sworn to before me
this 30th day of March, 2017


NOTARY PUBLIC-STATE OF NEW YORK

Tanya L. Selvaag
Notary Public-State of New York
No. 01SE6295087
Qualified in Franklin County
Commission Expires December 30, 2017

EXHIBIT A



Taken by Inv. J. Rebideau on 3/27/17 at approximately 2:31pm inside Northern Taxi.

EXHIBIT B



Taken by Inv. J. Rebideau on 3/27/17 at approximately 2:33pm inside Northern Taxi.

Business Certificate

Legal questions should always be addressed by an attorney.

I HEREBY CERTIFY that I am conducting or transacting business in the State of New York within the County of Clinton under the name or designation

of Chris's Shuttle Service

located at 188 Sand Rd, Morrisville NY 12962

My full name is Christopher Ray Crowningshield

and I reside at 188 Sand Rd Morrisville NY 12962

If under 18 years of age, state "I am ___ years of age".

I FURTHER CERTIFY that I am successor in interest to the following person or persons who formerly used this name to conduct or transact business.

Person's name N/A

I FURTHER CERTIFY and acknowledge that I have searched the records in the Clinton County Clerk's office and have found no business has the same or similar name and that I hold the County of Clinton harmless from any action thereof.

IN WITNESS WHEREOF, I have this 25 day of January, 2018 made and signed this certificate.

Chris Crowningshield

STATE OF NEW YORK
COUNTY OF CLINTON

On this 25 day of Jan. 2018, before me, the undersigned, a Notary Public in and for said State, personally appeared Christopher R Crowningshield, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s), on the instrument, the individual(s) or the person upon behalf of which the individual(s) acted, executed the instrument.

STATE OF NEW YORK
CLINTON COUNTY CLERKS OFFICE

I do hereby certify that I have compared the foregoing copy with the original thereof And that the same is a true copy of said original

Filed/Recorded in the Office on JAN 25 2018

Yiselle Harris Act. Clerk

Dated JAN 25 2018

Heather R Bouvia
(Signature and office of individual taking acknowledgment)

Heather R Bouvia
Notary Public, State of New York
04B06368556
Qualified in Clinton County
Comm. Expires Dec. 18, 2021

B

SUPREME COURT: STATE OF NEW YORK
COUNTY OF CLINTON

THE PEOPLE OF THE STATE OF NEW YORK,
by ERIC T. SCHNEIDERMAN, Attorney General

Petitioners,

against

CHRISTOPHER CROWNSHIELD,
d/b/a/ Northern Taxi,

Respondent.

**STIPULATION
AND
CONSENT**

Index No.

1. IT IS HEREBY ACKNOWLEDGED, STIPULATED, CONSENTED TO AND AGREED, by and between Petitioners, the People of the State of New York, by their attorney Eric T. Schneiderman, Attorney General of the State of New York, and Christopher Crowningshield, as follows:

2. Respondent hereby acknowledges receipt of a copy of the Verified Petition dated April 28, 2017.

3. Respondent consents to the entry of the attached Consent Order and Judgment.

4. This Stipulation and Consent is entered into by the Respondent by his own free will and voluntary act, with full knowledge and understanding of this proceeding and the obligations and duties imposed upon it by the Consent Order and Judgment.

5. Respondent shall pay to Petitioners TWO THOUSAND FIVE HUNDRED DOLLARS (\$2,500) as penalties and costs [four hundred dollars (\$400) forthwith and at least three hundred dollars \$300 on the 15th day of each month hereafter until paid in full], by checks made payable "Office of the Attorney General" and delivered to Glen F. Michaels, Assistant Attorney General, 43 Durkee Street, Suite 700, Plattsburgh, NY 12901.

6. No promise or inducement of any nature whatsoever has been made to Respondent by Petitioners or their attorney or other person in the Office of the Attorney General of the State of New York to procure this Stipulation and Consent and Consent Order and Judgment other than as set forth herein.

7. Respondent agrees that the entry of the Consent Order and Judgement shall not be deemed or construed as an approval by the Attorney General of any of the activities or practices, past or present, of Respondent or his agents, servants, assigns or any individual affiliate or entity through which Respondent may act, and Respondent shall not make any representation to the contrary.

8. Respondent acknowledges receipt of a copy of the annexed proposed Consent Order and Judgment and hereby consents to the making and entry thereof without further notice and hereby waives notice of any application for its entry.

[The remainder of this page has been intentionally left blank.]

Dated: May 3, 2017

ERIC T. SCHNEIDERMAN
Attorney General of the State of New York,
Attorney for Petitioners

By: [Signature]
Glen Francis Michaels
Assistant Attorney General
Plattsburgh Regional Office
43 Durkee Street, Suite 700
Plattsburgh, NY 12901
Fax (518) 562-3293 [not for service]

Sworn to before me
this 3rd day of May, 2017

[Signature]
Notary Public
Christopher J. Fleury
Notary Public-State of New York
No. 02FL6282547
Qualified in Franklin County
Commission Expires May 28, 2017

[Signature]
Christopher Crowningshield

None
Legal Counsel to
Christopher Crowningshield

C

At a Special Term of County
Court held in and for the County
of Clinton, at 137 Margaret
Street, Plattsburgh, New York,
on the 5th day of May 2017

**SUPREME COURT: STATE OF NEW YORK,
COUNTY OF CLINTON**

THE PEOPLE

OF THE STATE OF NEW YORK,

by ERIC T. SCHNEIDERMAN, Attorney
General

**CONSENT ORDER AND
JUDGMENT**

Index No. 2017-0796

Petitioners, against

CHRISTOPHER CROWNSHIELD,
d/b/a/ Northern Taxi,



Doc ID: *007753810006 Type: JUD
Recorded: 05/15/2017 at 09:50:13 AM
Fee Amt: \$0.00 Page 1 of 6
Clinton, NY
John H. Zurlo County Clerk

File **2017-00083348**

Respondent.

Upon reading and filing the Verified Petition, verified on April 28, 2017, and
the Stipulation and Consent of the parties, executed on May 3, 2017;

NOW, on motion of Eric T. Schneiderman, Attorney General of the State of
New York ("Attorney General"), attorney for Petitioners, Glen Francis Michaels,
Assistant Attorney General, of counsel, it is

ORDERED, ADJUDGED, AND DECREED that Respondent Christopher
Crownschild individually and doing business as Northern Taxi, and his agents,
trustees, servants, employees, successors, heirs and assigns, and any other person
under his direction and control, whether acting individually or in concert with others,

or through any corporate or other entity or device through which Christopher Crowningshield may now or hereafter act or conduct business (hereinafter collectively referred to as "Respondent"), are bound by the terms of this Consent Order and Judgment ("Judgment"); and it is further

ORDERED, ADJUDGED, AND DECREED that Respondent is permanently enjoined from violating GBL 396-p(1) and shall not make a taxicab available for hire – or lease a vehicle for use by another -- as a taxicab in New York State unless there is posted in the interior of such vehicle, in a manner legible and conspicuous to passengers, a statement of the rates, fares, or other charges whether imposed upon the basis of mileage, or fraction thereof, zones or other equivalent measurement and any additional charges for luggage or additional passengers, and if such charges are subject to variation, a statement of the conditions relating to such variation; and it is further

ORDERED, ADJUDGED, AND DECREED that Respondent is permanently enjoined from violating Section 243-6(I) of the Plattsburgh City Code and shall not make a taxicab available for hire – or lease a vehicle for use by another -- in the City of Plattsburgh unless there shall be affixed to the back of the front passenger seat of such taxicab, in a conspicuous place, a fare zone map and rate schedule in the form and size furnished by the City of Plattsburgh from time to time; and it is further

ORDERED, ADJUDGED, AND DECREED that Respondent is permanently enjoined from charging a total fare – or from soliciting, dispatching, or otherwise

making a vehicle available for transport – for a ride in a taxicab or any other vehicle to Canadian border which exceeds TEN times the maximum fare permitted from time to time by the City of Plattsburgh for travel by taxicab by one person within the borders of such City (where “travel to the Canadian border” means a ride from anywhere within the City or Town of Plattsburgh to any location within five (5) miles of the US-Canadian border; and “total fare” means the fare charged for all such persons traveling in the taxicab on such ride); and it is further

ORDERED, ADJUDGED, AND DECREED that Respondent is permanently enjoined from operating, or otherwise making a vehicle available to another for use by another as, a taxicab unless Respondent (or the driver of the vehicle if other than Respondent):

(i) prior to transporting any passenger for pay, (A) shall orally inform such passenger of the total fare for all persons to be transported to the requested destination, and (B) shall record in writing in a log or receipt book (which book maintains a carbon copy of whatever is written therein) the quoted fare; and

(ii) prior to travelling any distance with any passenger requesting transport to within five (5) miles of the Canadian border, shall have telephoned the Office of the Attorney General at (518) 562-3288 (or such other number as the Attorney General shall specify in writing) and informed the Attorney General of (A) the number of persons requesting transport, (B) the pickup location, (C) the

requested drop-off location, (D) total fare to be charged for all persons to be transported, and (E) the date and time the vehicle is leaving the pickup location.

(iii) prior to discharging such passenger, (A) shall record in the log or receipt book described in the prior paragraph the full amount of compensation received from all passengers for transport to the requested destination and (B) shall provide to each such passenger who has tendered payment an original or copy of a receipt showing the date of transport, the pick-up and drop-off locations, the fare previously quoted for the ride, and the full amount received by the driver from all persons who have been transported on such ride; and

(iv) shall maintain and preserve for at least seven (7) years from the date recorded a true and accurate copy of each quote or receipt required above; and

(v) shall make such preserved records available for inspection by the Attorney General within twenty-four (24) hours after each written request from the Attorney General for such inspection; and it is further

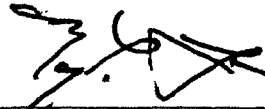
ORDERED, ADJUDGED, AND DECREED that, Respondent shall pay to Petitioners TWO THOUSAND FIVE HUNDRED DOLLARS (\$2,500) as penalties and costs, by check made payable "Office of the Attorney General" and delivered to Glen F. Michaels, Assistant Attorney General, 43 Durkee Street, Suite 700, Plattsburgh, NY 12901; and it is further

ORDERED, ADJUDGED, AND DECREED that nothing in this Order shall be construed to deprive any person of any private right or remedy; and it is further

ORDERED, ADJUDGED, AND DECREED that this Court shall retain jurisdiction over this matter, and the parties may apply to this Court for such other and further relief as they deem necessary for the purpose of carrying out the terms of this order and judgment.

ENTER:

Date: May 5, 2017


Hon. Mark L. Powers, JSC

**SUPREME COURT: STATE OF NEW YORK,
COUNTY OF CLINTON**

THE PEOPLE

OF THE STATE OF NEW YORK,
by ERIC T. SCHNEIDERMAN, Attorney General
43 Durkee Street, Suite 700
Plattsburgh, NY 12901-2958,

Petitioners,

against

**CONSENT ORDER
AND
JUDGMENT**

Index No. 2017-0796

CHRISTOPHER CROWNINGSHIELD,

d/b/a/ Northern Taxi,
188 Sand Road
Morrisonville, NY 12962

Respondent.



State of New York
Office of the Attorney General

ERIC T. SCHNEIDERMAN
ATTORNEY GENERAL

PLATTSBURGH
REGIONAL OFFICE

May 15, 2017

Christopher Crowningshield
d/b/a/ Northern Taxi
188 Sand Road
Morrisonville, NY 12962

RE: The State of New York v. Crowningshield
Index No. 2017-0796;

Dear Mr. Crowningshield:

Enclosed please find a copy of the Consent Order and Judgment with the Notice of Entry in the above-reference matter dated May 5, 2017, and filed and entered in the office of the Clerk of Clinton County on May 15, 2017.

Sincerely,

Glen Francis Michaels
Assistant Attorney General
in Charge

Enclosure



State of New York
Office of the Attorney General

ERIC T. SCHNEIDERMAN
ATTORNEY GENERAL

PLATTSBURGH
REGIONAL OFFICE

May 15, 2017

Hon. John Zurlo
Clinton County Clerk
Clinton County Government Center
137 Margaret Street
Plattsburgh, NY 12901

RE: The State of New York v. Crowningshield
Index No. 2017-0796;

Dear Mr. Zurlo:

Enclosed please find the original Affidavit of Service along with Notice of Entry in the above matter for filing.

I am also enclosing a photocopy of the Affidavit of Service. Would you kindly provide notice of filing on this copy and return same in the self-addressed, postage-paid envelope at your earliest convenience?

Thank you for your assistance.

Very truly yours,

Carol Plumadore
Secretary I

Enclosures



COPY

STATE OF NEW YORK)
)
COUNTY OF CLINTON)

RE: The State of New York v. Crowningshield
Index No. 2017-0796;

CAROL PLUMADORE, being duly sworn, says: I am over eighteen years of age and am an employee of the Office of the Attorney General of the State of New York, attorney for the respondents herein.

On the 15th day of May, 2017 I served the CONSENT ORDER AND JUDGMENT (filed/entered 05/15/2017) with Notice of Entry upon the Petitioner named below, by depositing a true copy of said document, enclosed in a sealed, postpaid wrapper, in the letter box of the post office in the City of Plattsburgh, New York, a depository under the exclusive care and custody of the United States Post Office Department, directed to the said petitioner at the last known address provided as follows:

Christopher Crowningshield
d/b/a/ Northern Taxi
188 Sand Road
Morrisonville, NY 12962

Carol Plumadore
CAROL PLUMADORE

Sworn to before me this

15th day of May, 2017

Tanya L. Selvaag
NOTARY PUBLIC

Tanya L. Selvaag
Notary Public-State of New York
No. 01SE6295087
Qualified in Franklin County
Commission Expires December 30, 2017

State of New York
Supreme Court, County of Clinton

Hon. Mark L. Powers, JSC

The People of the State of New York by
ERIC T. SCHNEIDERMAN
ATTORNEY GENERAL,
43 Durkee Street, Suite 700
Plattsburgh, NY 12901

Petitioners,

- against -


Christopher Crowningshield,
d/b/a Northern Taxi
188 Sand Road
Morrisonville, NY 12962,
Respondent.

NOTICE OF ENTRY
Index No. 2017-0796

PLEASE TAKE NOTICE that the CONSENT ORDER AND JUDGMENT in this
action was entered in the Office of the County Clerk of Clinton County, on May
15, 2017.

DATED: Plattsburgh, New York
May 15, 2017

ERIC T. SCHNEIDERMAN
Attorney General of the
State of New York
Attorney for Respondents.
43 Durkee Street, Suite 700
Plattsburgh, New York 12901

BY: 
Glen Francis Michaels
Assistant Attorney General
of Counsel
Phone: (518) 562-3288

TO: Christopher Crowningshield
d/b/a/ Northern Taxi

At a Special Term of County Court held in and for the County of Clinton, at 137 Margaret Street, Plattsburgh, New York, on the 5th day of May 2017

SUPREME COURT: STATE OF NEW YORK,
COUNTY OF CLINTON

THE PEOPLE

OF THE STATE OF NEW YORK,


by ERIC T. SCHNEIDERMAN, Attorney General

**CONSENT ORDER AND
JUDGMENT**

Index No. 2017-0796

Petitioners, against

CHRISTOPHER CROWNSHIELD,
d/b/a/ Northern Taxi,


Doc ID: *007753810006 Type: JUD
Recorded: 05/15/2017 at 09:50:13 AM
Fee Amt: \$0.00 Page 1 of 6
Clinton, NY
John H. Zurlo County Clerk
File **2017-00083348**

Respondent.

Upon reading and filing the Verified Petition, verified on April 28, 2017, and the Stipulation and Consent of the parties, executed on May 3, 2017;

NOW, on motion of Eric T. Schneiderman, Attorney General of the State of New York ("Attorney General"), attorney for Petitioners, Glen Francis Michaels, Assistant Attorney General, of counsel, it is

ORDERED, ADJUDGED, AND DECREED that Respondent Christopher Crowningshield individually and doing business as Northern Taxi, and his agents, trustees, servants, employees, successors, heirs and assigns, and any other person under his direction and control, whether acting individually or in concert with others,

or through any corporate or other entity or device through which Christopher Crowningshield may now or hereafter act or conduct business (hereinafter collectively referred to as "Respondent"), are bound by the terms of this Consent Order and Judgment ("Judgment"); and it is further

ORDERED, ADJUDGED, AND DECREED that Respondent is permanently enjoined from violating GBL 396-p(1) and shall not make a taxicab available for hire -- or lease a vehicle for use by another -- as a taxicab in New York State unless there is posted in the interior of such vehicle, in a manner legible and conspicuous to passengers, a statement of the rates, fares, or other charges whether imposed upon the basis of mileage, or fraction thereof, zones or other equivalent measurement and any additional charges for luggage or additional passengers, and if such charges are subject to variation, a statement of the conditions relating to such variation; and it is further

ORDERED, ADJUDGED, AND DECREED that Respondent is permanently enjoined from violating Section 243-6(I) of the Plattsburgh City Code and shall not make a taxicab available for hire -- or lease a vehicle for use by another -- in the City of Plattsburgh unless there shall be affixed to the back of the front passenger seat of such taxicab, in a conspicuous place, a fare zone map and rate schedule in the form and size furnished by the City of Plattsburgh from time to time; and it is further

ORDERED, ADJUDGED, AND DECREED that Respondent is permanently enjoined from charging a total fare -- or from soliciting, dispatching, or otherwise

making a vehicle available for transport – for a ride in a taxicab or any other vehicle to Canadian border which exceeds TEN times the maximum fare permitted from time to time by the City of Plattsburgh for travel by taxicab by one person within the borders of such City (where “travel to the Canadian border” means a ride from anywhere within the City or Town of Plattsburgh to any location within five (5) miles of the US-Canadian border; and “total fare” means the fare charged for all such persons traveling in the taxicab on such ride); and it is further

ORDERED, ADJUDGED, AND DECREED that Respondent is permanently enjoined from operating, or otherwise making a vehicle available to another for use by another as, a taxicab unless Respondent (or the driver of the vehicle if other than Respondent):

(i) prior to transporting any passenger for pay, (A) shall orally inform such passenger of the total fare for all persons to be transported to the requested destination, and (B) shall record in writing in a log or receipt book (which book maintains a carbon copy of whatever is written therein) the quoted fare; and

(ii) prior to travelling any distance with any passenger requesting transport to within five (5) miles of the Canadian border, shall have telephoned the Office of the Attorney General at (518) 562-3288 (or such other number as the Attorney General shall specify in writing) and informed the Attorney General of (A) the number of persons requesting transport, (B) the pickup location, (C) the

requested drop-off location, (D) total fare to be charged for all persons to be transported, and (E) the date and time the vehicle is leaving the pickup location.

(iii) prior to discharging such passenger, (A) shall record in the log or receipt book described in the prior paragraph the full amount of compensation received from all passengers for transport to the requested destination and (B) shall provide to each such passenger who has tendered payment an original or copy of a receipt showing the date of transport, the pick-up and drop-off locations, the fare previously quoted for the ride, and the full amount received by the driver from all persons who have been transported on such ride; and

(iv) shall maintain and preserve for at least seven (7) years from the date recorded a true and accurate copy of each quote or receipt required above; and

(v) shall make such preserved records available for inspection by the Attorney General within twenty-four (24) hours after each written request from the Attorney General for such inspection; and it is further

ORDERED, ADJUDGED, AND DECREED that, Respondent shall pay to Petitioners TWO THOUSAND FIVE HUNDRED DOLLARS (\$2,500) as penalties and costs, by check made payable "Office of the Attorney General" and delivered to Glen F. Michaels, Assistant Attorney General, 43 Durkee Street, Suite 700, Plattsburgh, NY 12901; and it is further

ORDERED, ADJUDGED, AND DECREED that nothing in this Order shall be construed to deprive any person of any private right or remedy; and it is further

ORDERED, ADJUDGED, AND DECREED that this Court shall retain jurisdiction over this matter, and the parties may apply to this Court for such other and further relief as they deem necessary for the purpose of carrying out the terms of this order and judgment.

ENTER:

Date: May 5, 2017


Hon. Mark L. Powers, JSC

**SUPREME COURT: STATE OF NEW YORK,
COUNTY OF CLINTON**

THE PEOPLE

OF THE STATE OF NEW YORK,

by ERIC T. SCHNEIDERMAN, Attorney General

43 Durkee Street, Suite 700

Plattsburgh, NY 12901-2958,

Petitioners,

against

**CONSENT ORDER
AND
JUDGMENT**

Index No. 2017-0796

CHRISTOPHER CROWNSHIELD,

d/b/a/ Northern Taxi,

188 Sand Road

Morrisonville, NY 12962

Respondent.

E

SUPREME COURT: STATE OF NEW YORK,
COUNTY OF CLINTON

THE PEOPLE

OF THE STATE OF NEW YORK,

by ERIC T. SCHNEIDERMAN, Attorney General

43 Durkee Street, Suite 700

Plattsburgh, NY 12901-2958,

Petitioners,

against

RECEIPT

Index No. 2017-0796

CHRISTOPHER CROWNINGSHIELD,

d/b/a/ Northern Taxi,

188 Sand Road

Morrisonville, NY 12962

Respondent.

RECEIVED from Christopher Crowningshield this day FOUR HUNDRED
DOLLARS (\$400):

May 17, 2017



Glen F. Michaels, AAGIC

SUPREME COURT: STATE OF NEW YORK,
COUNTY OF CLINTON

THE PEOPLE

OF THE STATE OF NEW YORK,

by ERIC T. SCHNEIDERMAN, Attorney General
43 Durkee Street, Suite 700
Plattsburgh, NY 12901-2958,

Petitioners,

against

RECEIPT

Index No. 2017-0796

CHRISTOPHER CROWNINGSHIELD,

d/b/a/ Northern Taxi,
188 Sand Road
Morrisonville, NY 12962

Respondent.

RECEIVED from Christopher Crowningshield this day SIX HUNDRED
DOLLARS (\$600):

June 22, 2017



Glen F. Michaels, AAGIC

SUPREME COURT: STATE OF NEW YORK
COUNTY OF CLINTON

F

THE PEOPLE OF THE STATE OF NEW YORK,

By Eric T. Schneiderman, Attorney General,
Petitioners,

against

CHRISTOPHER CROWNSHIELD,

d/b/a/ Northern Taxi,
Respondent

**AFFIDAVIT OF
CAROL PLUMADORE**

Index No. 2017-0796

Carol Plumadore, being duly sworn, deposes and says:

1. For many years I served as Secretary I in the Plattsburgh Regional Office of the New York State Attorney General. This included the period May 3, 2017, through February 14, 2018.

2. As Secretary my assigned phone number was 518.562.3288. Although occasionally other office personnel would answer that extension, nearly all of the time I answered calls to this phone or retrieved the messages that came in on it outside of normal business hours.

3. One of the duties assigned to me beginning May 3, 2017 was to record in a database all telephone calls received by the Plattsburgh Regional Office from Christopher Crowningshield or his taxi drivers reporting rides to the border, including the time of the ride, the number of persons transported and the fares received.

4. If for some reason I missed such a call from Mr. Crowningshield or a driver and it was taken by another staff member of the Plattsburgh Regional Office, that person would report the message to me, and either she or I would record it in the database.

5. Each morning I would retrieve messages left on 518.562.3288 and record in the database all calls from Mr. Crowningshield or one of his drivers.

6. Attached is a true and accurate copy of the database of the calls received on 518.562.3288 from Mr. Crowningshield and his drivers regarding trips to the border.

7. As noted in the database, calls started coming in on May 4, 2017, just after Mr. Crowningshield had signed a Stipulation agreeing to make the calls.

8. The last call that came in on 518.562.3288 was made in the early morning hours of August 30, 2018.

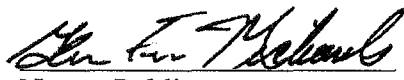
9. After that time I received no phone calls and no phone messages on 518.562.3288 or any other phone line from Mr. Crowningshield or one of his drivers reporting trips to the border. No other staff member of the Plattsburgh Regional Office reported to me a phone call or message from Mr. Crowningshield or one of his drivers.

10. My last day working in the Plattsburgh Regional Office of the Attorney General was February 14, 2018.

11. Since the last phone message on August 30, 2017, through February 14, 2018, I received no phone calls or messages reporting rides to the border from Mr. Crowningshield or one of his drivers.


Carol Plumadore

Sworn to before me this
19th day of December 2018


Notary Public

GLEN FRANCIS MICHAELS
Notary Public, State of New York
No. 02MI6353023
Qualified in Clinton County
Commission Expires Jan. 9, 2021

Crowningshield / Northern Taxi - Log of Calls re transport to the border						
<u>Date</u>	<u>Time</u>	<u>Destination</u>	<u># Passengers</u>	<u>Fare</u>	<u>Company</u>	<u>Your name</u>
05/04/17	15:49	Roxham Road	2	\$60	Northern	Caroline
05/05/17	10:05	Roxham Road	4	\$75	Northern	Carol
05/05/17	3:58	Roxham Road	2	\$75	Northern	Carol
05/05/17	8:14	Roxham Road	1	\$45	Northern	Carol
	7:00	Roxham Road	1	\$75	Northern	Carol
05/06/17	10:27	Roxham Road	2	\$75	Northern	Carol
05/07/17	1:32	Roxham Road	1		Northern	Carol
05/07/17	6:00	Roxham Road	2 Adults 1 baby		Northern	Carol
05/08/17	6:20	Roxham Road	3	\$75	Northern	Carol
	6:30	Roxham Road	1	\$75	Northern	Carol
05/08/17	1:30	Roxham Road			Northern	Carol
05/08/17	7:39	Roxham Road		\$75	Northern	Carol
05/08/17	5:43	Roxham Road	1	\$75	Northern	Carol
05/09/17	8:22	Roxham Road	1	\$75	Northern	Carol
05/09/17	9:35	Roxham Road	2	\$75	Northern	Carol
05/09/17		Roxham Road	2	\$75	Northern	Carol
05/09/17	7:10	Roxham Road	7	\$75	Northern	Carol
05/09/17	8:30	Frontier	2	\$80	Northern	Carol
05/08/17	3:45	Roxham Road	1	\$75	Northern	Tanya
05/09/17	4:25	Roxham Road	4	\$75	Northern	Tanya
05/09/17	?	Roxham Road	1	\$75	Northern	Tanya
05/09/17	3:45	Roxham Road	5	\$75	Northern	Tanya
05/10/17	4:10	Roxham Road	3	\$75	Northern	Tanya
05/11/17	12:30	Roxham Road	1	\$75	Northern	Carol
05/11/17	11:55	Roxham Road	1 A; 3 C	\$75	Northern	Carol
	3:30	Roxham Road	5	\$75	Northern	Carol
		Roxham Road	2 fam. (6 total)	\$75	Northern	Carol
		Roxham Road	1	\$75	Northern	Carol
05/13/17	4:30	Roxham Road	1 family	\$75	Northern	Carol
05/13/17	6:38	Roxham Road	1	\$75	Northern	Carol
05/13/17	4:00	Roxham Road	1	\$75	Northern	Carol
05/13/17	4:10	Roxham Road	1	\$75	Northern	Carol
05/15/17		Roxham Road	1	\$75	Northern	Carol
05/15/17		Roxham Road	Family	\$75	Northern	Carol
05/15/17	7:15	Roxham Road	2	\$75	Northern	Carol
05/15/17	8:00	Roxham Road	3	\$75	Northern	Carol
05/15/17		Roxham Road	4	\$75	Northern	Carol
		Roxham Road	1	\$75	Northern	Carol
05/17/17	4:51	Roxham Road	5	\$75	Northern	Carol
05/18/17	10:17am	Roxham Road	3	\$75	Northern	Tanya
05/18/17	4:09pm	Roxham Road	2	\$75	Northern	Tanya
05/18/17	10:28 p.m.	Roxham Road	3A - 2C	\$75	Northern	Carol

05/19/17	7:10 a.m.	Roxham Road	1	\$75 + \$25 tip	Northern	Carol
05/20/17	7:12 a.m.	Roxham Road	1	\$75	Northern	Carol
05/20/17	9:11 a.m.	Roxham Road	3	\$75	Northern	Carol
05/20/17	3:56	Roxham Road	1	\$75	Northern	Carol
05/22/17	12:30 a.m.	Roxham Road	2	\$75 ea/\$25 tip ea	Northern	Carol
05/23/17	5:46 a.m.	Roxham Road	1	\$75	Northern	Carol
05/23/17	7:27 a.m.	Roxham Road	1	\$75	Northern	Carol
05/22/17	16:03	Roxham Road	1	\$65	Northern	Tanya
05/24/17	1:52	Roxham Road	2	\$75	Northern	Carol
05/24/17	2:25	Roxham Road	5	\$75	Northern	Carol
05/24/17	6:55 a.m.	Roxham Road	1	\$75	Northern	Carol
05/24/17	8:00 a.m.	Roxham Road	2	\$75	Northern	Carol
05/25/17	6:15 a.m.	Roxham Road	1	\$75	Northern	Carol
05/25/17	3:33 p.m.	Roxham Road	2	\$75	Northern	Carol
05/26/17	3:00 a.m.	Roxham Road	6	\$125	Northern	Carol
05/26/17	5:57 p.m.	Roxham Road	1	\$75	Northern	Carol
05/27/17	3:35 p.m.	Roxham Road	1	\$75/\$25 tip	Northern	Carol
05/27/17	4:03 p.m.	Roxham Road	4	\$75	Northern	Carol
05/27/17	5:55 p.m.	Roxham Road	3	\$75	Northern	Carol
05/28/17	6:13 a.m.	Roxham Road/LaColle	2	\$75 each	Northern	Carol
05/28/17	10:30	Roxham Road	7	\$75	Northern	Carol
05/29/17	10:30 a.m.	Roxham Road	1	\$75	Northern	Carol
05/29/17	5:22 p.m.	Roxham Road	1	\$75	Northern	Carol
05/30/17	12:05 P.M.	Roxham Road	4	\$75	Northern	Carol
05/31/17		Roxham Road	5	\$75	Northern	Carol
05/31/17	6:51 a.m.	Roxham Road	1		Northern	Carol
05/31/17	8:45	Roxham Road	1	\$75	Northern	Carol
05/31/17	8:45	Roxham Road	3	\$75	Northern	Carol
05/31/17	4:12	Roxham Road	2	\$75	Northern	Carol
05/31/17	7:43	Roxham Road	5	\$75	Northern	Carol
06/01/17	5:57	Roxham Road	5	\$75	Northern	Carol
06/01/17	6:15	Roxham Road	5	4@\$75-1@\$75	Northern	Carol
06/01/17	9:45	Roxham Road	5	\$75	Northern	Carol
06/01/17	10:47	Border	3	\$75	Northern	Carol
06/01/17	10:56	Roxham Road	3	\$75	Northern	Carol
06/01/17	4:18	Border	4	\$75	Northern	Carol
06/02/17	6:06	Border	1	\$75	Northern	Carol
06/02/17	5:10 p.m.	Roxham Road	1	\$75	Northern	Carol
06/02/17	6:02 p.m.	Roxham Road	1	\$75	Northern	Carol
06/03/17	5:53 a.m.	Roxham Road	3		Northern	Carol
06/03/17	4:08 p.m.	Roxham Road	7	\$75	Northern	Carol
06/04/17	10:27 a.m.	Roxham Road	1	\$75	Northern	Carol
06/04/17	5:30 p.m.	Roxham Road		\$75	Northern	Carol
06/04/17	5:47 p.m.	Roxham Road	Family	\$75	Northern	Carol
06/05/17	5:48 a.m.	Roxham Road	1	\$75	Northern	Carol

06/05/17	6:30 a.m.	Roxham Road	1	\$75	Northern	Carol
06/05/17	7:00 a.m.	Roxham Road	1	\$75	Northern	Carol
06/05/17	3:45 p.m.	Roxham Road	1	\$75	Northern	Carol
06/05/17	6:30 p.m.	Roxham Road	1	\$75	Northern	Carol
06/06/17	5:02 a.m.	Roxham Road	2	\$75	Northern	Carol
06/06/17	12:10 p.m.	Roxham Road	5	\$75	Northern	Carol
06/06/17	12:10 p.m.	Roxham Road	1	\$75	Northern	Carol
06/07/17	5:30	Roxham Road	2	No Charge	Northern	Carol
06/07/17	6:00	Roxham Road	1	\$75	Northern	Carol
06/06/17	5:00	Roxham Road	4	\$75	Northern	Carol
06/07/17		Roxham Road	2	\$75	Northern	Carol
06/07/17		Roxham Road	3	\$85	Northern	Carol
06/08/17	8:40	Roxham Road	1	\$75/\$25 tip	Northern	Carol
06/08/17	6:30	Roxham Road	1	\$75	Northern	Carol
06/08/17	11:00	Roxham Road	3	\$75	Northern	Carol
06/09/17	1:00 a.m.	Roxham Road	2	\$75	Northern	Carol
06/10/17	5:30	Roxham Road	1	\$60	Northern	Carol
06/10/17	11:35	Roxham Road	3	\$75	Northern	Carol
06/11/17	8:30	Roxham Road	1	\$75	Northern	Carol
06/11/17	7:38	Roxham Road	Family	\$75	Northern	Carol
06/11/17	7:54	Roxham Road	2 Cabs	\$75 each	Northern	Carol
06/12/17	3:00	Roxham Road	Family	\$75	Northern	Carol
06/13/17	6:00	Roxham Road	4		Northern	Carol
06/13/17	7:00	Roxham Road	Family	\$100	Northern	Carol
06/13/17	9:45	Roxham Road	Family	\$75	Northern	Carol
06/14/17	7:00	Roxham Road	2	\$100	Northern	Carol
06/14/17	8:00	Rte. 9 Border	1	\$83	Northern	Carol
06/14/17	9:20	Roxham Road	3	\$75	Northern	Carol
06/14/17	3:44	Roxham Road	1	\$75	Northern	Carol
06/14/17	3:44	Roxham Road	4	\$75	Northern	Carol
06/15/17	6:46	Roxham Road	1	\$60	Northern	Carol
06/18/17	5:35 p.m.	Roxham Road	4	\$75	Northern	Carol
06/19/17	4:14 a.m.	Roxham Road	8	\$75	Northern	Carol
06/19/17	4:21 a.m.	Roxham Road	1	\$75	Northern	Carol
06/19/17	7:00 a.m.	Roxham Road	6	\$75	Northern	Carol
06/19/17	1:02	Roxham Road	1	\$75	Northern	Carol
06/19/17	3:54	Roxham Road	1	\$75	Northern	Carol
06/20/17	7:20	Roxham Road	Family	\$75	Northern	Carol
06/22/17	6:00	Main Border	1	\$75	Northern	Carol
06/22/17	7:15	Roxham Road	2	\$75	Northern	Carol
06/22/17	3:00	Roxham Road	2	\$75	Northern	Carol
06/22/17	4:30	Roxham Road	2	\$75	Northern	Carol
06/22/17	9:00	Roxham Road	2	\$75	Northern	Carol
06/22/17	7:50	Roxham Road	1	\$75	Northern	Carol
06/22/17		Roxham Road	1	\$75	Northern	Carol

06/22/17		Roxham Road	Group	\$75	Northern	Carol
06/23/17	6:00	Roxham Road	4	\$75	Northern	Carol
06/24/17	2:32	Roxham Road	3	\$75	Northern	Carol
06/24/17	2:30	Roxham Road	5	\$75	Northern	Carol
06/24/17	4:15	Roxham Road	6	\$75	Northern	Carol
06/24/17	5:30	Roxham Road	2	\$75	Northern	Carol
06/25/17	3:00	Roxham Road	4	\$75	Northern	Carol
06/25/17	6:29	Roxham Road	1	\$70	Northern	Carol
06/25/17	8:07	Roxham Road	3	\$75	Northern	Carol
06/26/17	4:30	Roxham Road	3	\$75	Northern	Carol
06/26/17	4:30	Roxham Road	4	\$75	Northern	Carol
06/26/17	4:20	Roxham Road	6	\$75	Northern	Carol
06/26/17	8:00	Roxham Road	3	\$60	Northern	Carol
06/26/17	8:45	Roxham Road	2	\$75/\$80 tip	Northern	Carol
06/26/17	9:30	Roxham Road	5	\$75/\$20 tip	Northern	Carol
06/26/17	3:00	Roxham Road	3	\$75/\$25 tip	Northern	Carol
06/26/17	4:30	Roxham Road	1	\$75	Northern	Carol
06/26/17	6:56	Roxham Road	1	\$40??	Northern	Carol
06/27/17	6:00	Roxham Road	2	\$75	Northern	Carol
06/27/17	8:30	Roxham Road	4	\$75/\$25 tip	Northern	Carol
06/27/17	3:00	Roxham Road	1	\$75	Northern	Carol
06/27/17	3:00	Roxham Road	1	\$70	Northern	Carol
06/27/17	3:00	Roxham Road	3	\$70	Northern	Carol
06/27/17	9:30	Roxham Road	1	\$75/\$25 tip	Northern	Carol
06/28/17	1:30	Roxham Road	1	\$75	Northern	Carol
06/28/17	7:30	Roxham Road	1	\$75	Northern	Carol
06/28/17	2:54	Roxham Road	2	\$75	Northern	Carol
06/29/17	12:30	Roxham Road	3	\$75	Northern	Carol
06/29/17	3:15			\$75	Northern	Carol
06/29/17	7:00			\$75/\$5 tip	Northern	Carol
06/29/17	11:00	Roxham Road	1	\$75	Northern	Carol
06/29/17	2:55	Roxham Road	1	\$75/\$5 tip	Northern	Carol
06/29/17	7:00	Roxham Road	2	\$75	Northern	Carol
06/30/17	2:00	Roxham Road	4	\$75	Northern	Carol
06/30/17	3:14	Roxham Road	3	\$75	Northern	Carol
06/30/17	2:30	Roxham Road	2	\$75	Northern	Carol
07/02/17	7:18	Roxham Road	3 and 4	\$80/\$80/\$2 tip	Northern	Carol
07/03/17	3:23	Roxham Road	2	\$75/\$5 tip	Northern	Carol
07/03/17	5:55	Roxham Road	5	\$80	Northern	Carol
07/03/17	7:50	Roxham Road	4	\$80	Northern	Carol
07/03/17	3:31	Roxham Road	1	\$75	Northern	Carol
07/04/17	2:15	Roxham Road	1	\$75/\$25 tip	Northern	Carol
07/04/17	3:40	Roxham Road	4	\$75	Northern	Carol
07/04/17	4:20	Roxham Road	5	\$75	Northern	Carol
07/04/17	6:15	Roxham Road	1	\$75	Northern	Carol

07/04/17	7:34	Roxham Road	3	\$75	Northern	Carol
07/04/17	8:30	Roxham Road	1	\$75	Northern	Carol
07/05/17	4:20	Roxham Road	7	\$75	Northern	Carol
07/05/17	8:05	Roxham Road	2	\$75	Northern	Carol
07/05/17	10:00	Roxham Road	1	\$50	Northern	carol
07/06/17	1:32	Roxham Road	2	\$75/\$10 tip	Northern	Carol
07/06/17	5:11	Roxham Road	1	\$75/\$5 tip	Northern	Carol
07/06/17	6:06	Roxham Road	4	\$75	Northern	Carol
07/06/17	2:40	Roxham Road	2	\$75	Northern	Carol
07/06/17	4:30	Roxham Road	1	\$75	Northern	Carol
07/06/17	4:30	Roxham Road	1	\$75/\$5 tip	Northern	Carol
07/06/17	10:20	Roxham Road	1 family	\$75	Northern	Carol
07/07/17	2:15	Roxham Road	4	\$75	Northern	Carol
07/07/17	2:15	Roxham Road	2	\$75	Northern	Carol
07/07/17	3:50	Roxham Road	1	\$75/\$25 tip	Northern	Carol
07/07/17	6:41	Roxham Road	7	\$75	Northern	carol
07/07/17	7:40	Roxham Road	2	\$75	Northern	Carol
07/07/17	10:32	Roxham Road	2	\$75	Northern	Carol
07/07/17	1:00	Roxham Road	5	\$75	Northern	Carol
07/07/17	1:00	Roxham Road	2	\$75	Northern	Carol
07/07/17	3:36	Roxham Road	3	\$75	Northern	Carol
07/08/17	2:40	Roxham Road	5 and 1	\$75 ea	Northern	Carol
07/08/17	3:42	Roxham Road	1, 3 and 3	\$75/\$75/\$75	Northern	Carol
07/08/17	5:38	Roxham Road	2	\$75/\$5 tip	Northern	Carol
07/08/17	9:25	Roxham Road	4 and 3	\$75/\$75	Northern	Carol
07/08/17	3:00	Roxham Road	2 groups	\$75 each	Northern	Carol
07/09/17	1:30	Roxham Road	5	\$75	Northern	Carol
07/09/17	1:36	Roxham Road	6	\$75/\$20 tip	Northern	Carol
07/09/17	3:48	Roxham Road	3	\$75	Northern	Carol
07/09/17	6:40	Roxham Road	3	\$75	Northern	Carol
07/09/17	7:57	Roxham Road	1	\$75	Northern	Carol
07/10/17	1:50	Roxham Road	4	\$75	Northern	Carol
07/10/17	2:40	Roxham Road	4	\$75	Northern	Carol
07/10/17	2:46	Roxham Road	1	\$60	Northern	Carol
07/10/17	4:14	Roxham Road	2	\$75	Northern	Carol
07/10/17	7:20	Roxham Road	2	\$75	Northern	Carol
07/11/17	2:00	Roxham Road	1	\$75/\$5 tip	Northern	Carol
07/11/17	3:56	Roxham Road	2	\$75	Northern	Carol
07/11/17	6:30	Roxham Road	1	\$75	Northern	Carol
07/11/17	2:58	Roxham Road	2	\$75	Northern	Carol
07/11/17	6:30	Roxham Road	2	\$75	Northern	Carol
07/12/17	1:57	Roxham Road	5	\$75	Northern	Carol
07/12/17	2:00	Roxham Road	1	\$75	Northern	Carol
07/12/17	3:30	Roxham Road	5	?	Northern	Carol
07/12/17	6:05	Roxham Road	1	\$80	Northern	Carol

07/12/17	6:30	Roxham Road	?	\$75	Northern	Carol
07/12/17	3:20	Roxham Road	5	\$75	Northern	Carol
07/12/17	5:14	Roxham Road	2	\$75/\$5 tip	Northern	Carol
07/13/17	2:10	Roxham Road	5	\$75/\$10 tip	Northern	Carol
07/13/17	2:35	Roxham Road	2	\$75	Northern	Carol
07/13/17	4:40	Roxham Road	3	?	Northern	Carol
07/13/17	5:54	Roxham Road	5	\$75/\$25 tip	Northern	Carol
07/13/17	6:54	Roxham Road	2	\$75	Northern	Carol
07/13/17	8:05	Roxham Road	3	\$75/\$25 tip	Northern	Carol
07/13/17	2:43	Roxham Road	4	?	Northern	Carol
07/13/17	6:08	Roxham Road	5	?	Northern	Carol
07/14/17	1:50	Roxham Road	6	\$100	Northern	Carol
07/14/17	6:46	Roxham Road	1	\$75	Northern	Carol
07/07/17	9:00	Border	1	\$75	Northern	Carol
07/08/17	7:00	Border	3	\$78	Northern	Carol
07/08/17	8:00	Border	1	\$75/\$25 tip	Northern	Carol
07/08/17	10:00	Border	1	\$75	Northern	Carol
07/14/17	3:00	Roxham Road	2	\$75	Northern	Carol
07/15/17	4:15	Roxham Road	1 group	\$75	Northern	Carol
07/15/17	4:15	Roxham Road	1 group	\$75	Northern	Carol
07/16/17	7:15	Roxham Road	5	\$75/\$5 tip	Northern	Carol
07/16/17	7:15	Roxham Road	6	\$75/\$20 tip	Northern	Carol
07/16/17	3:00	Roxham Road	3	\$75	Northern	Carol
07/16/17	3:03	Roxham Road	5	\$75/\$25 tip	Northern	Carol
07/16/17	4:30	Border	3	\$75/\$5 tip	Northern	Carol
07/16/17	7:50	Border	2	\$75	Northern	Carol
07/17/17	2:17	Roxham Road	2 groups	\$75	Northern	Carol
07/17/17	?	Roxham Road	7	\$75	Northern	Carol
07/17/17	4:05	Roxham Road	6	\$75	Northern	Carol
07/18/17	1:32	Border	3	\$75	Northern	Carol
07/18/17	6:45	Border	2	\$75	Northern	Carol
07/18/17	12:40	Border	1	\$75	Northern	Carol
07/18/17	12:24	Border	2	\$75/\$10 tip	Northern	Carol
07/18/17	5:40	Roxham Road	1	\$75	Northern	Carol
07/19/17	6:06	Roxham Road	4	\$75	Northern	Carol
07/19/17	5:38	Roxham Road	6	\$75	Northern	Carol
07/19/17	12:25	Border	4	\$75	Northern	Carol
07/19/17	3:40	Border	2	\$75	Northern	Carol
07/19/17	3:40	Border	2	\$75	Northern	Carol
07/19/17	5:29	Border	6	\$75	Northern	Carol
07/20/17	2:28	Border	6	\$120	Northern	Carol
07/20/17	11:13	Border	4	\$75	Northern	Carol
07/20/17	12:42	Border	2	\$75	Northern	Carol
07/20/17	1:02	Roxham Road	4	\$75	Northern	Carol
07/20/17	2:50	Border	2	\$75	Northern	Carol

07/20/17	9:33	Roxham Orad	1	\$75	Northern	Carol
07/20/17	2:36	Border	2	\$75	Northern	Carol
07/20/17	4:09	Roxham Road	2	\$75	Northern	Carol
07/20/17	4:43	Roxham Road	1	\$75	Northern	Carol
07/21/17	6:47	Roxham Road	8	\$75	Northern	Carol
07/21/17	6:47	Roxham Road	8	\$75	Northern	Carol
07/21/17	8:20	Border	1	\$75	Northern	Carol
07/21/17	3:20	Roxham Road	2	\$75	Northern	Carol
07/22/17	3:02	Border	4	\$100	Northern	Carol
07/22/17	1:42	Border	2	\$75	Northern	Carol
07/22/17	4:58	Roxham Road	3	\$40 ea	Northern	Carol
07/22/17	5:11	Border ?		\$100	Northern	Carol
07/22/17	7:13	Border	7	\$350	Northern	Carol
07/22/17	8:38	Border	3	\$75 ea	Northern	Carol
07/22/17	3:01	Border 1 group		\$75	Northern	Carol
07/22/17	5:44	Roxham Road 2 groups		\$75	Northern	carol
07/22/17	9:52	Border	1	\$70	Northern	Carol
07/22/17	1:42	Border	5	\$100	Northern	Carol
07/23/17	3:43	?	6	\$120	Northern	Carol
07/23/17	6:43	? 1 group		\$75	Northern	Carol
07/23/17	6:46	Border	4	\$135	Northern	Carol
07/23/17	8:06	Border ?		\$75	Northern	Carol
07/23/17	3:14	Roxham Road 3 cabs		\$75 ea	Northern	Carol
07/23/17	6:21	Roxham Road 2 fam		?	Northern	Carol
07/23/17	10:02	Roxham Road	7	?	Northern	Carol
07/24/17	1:55	Roxham Road	4	\$200	Northern	Carol
07/24/17	4:42	Roxham Road 2 groups		\$75 ea	Northern	carol
07/24/17	7:06	Roxham Road 2 groups		\$75 ea	Northern	Carol
07/25/17	1:04	Roxham Road	1	\$75	Northern	Carol
07/25/17	1:00	Roxham Road 2 families		\$75-\$200	Northern	Carol
07/25/17	2:30	Roxham Road 2 sets		\$80 ea	Northern	Carol
07/25/17	3:44	Roxham Road	3	\$75	Northern	Carol
07/25/17	6:31	Roxham Road	1	\$75	Northern	Carol
07/26/17	2:15	Roxham Road 3 families		\$80 each	Northern	Carol
07/26/17	12:14	Roxham Road	1	\$75	Northern	Carol
07/26/17	4:56	Roxham Road ?		\$100	Northern	Carol
07/26/17	5:22	Roxham Road 2 families		\$80 ea	Northern	Carol
07/27/17		Roxham Road 3 sets		\$50 ea	Northern	Carol
07/27/17	2:41	Roxham Road 4 families		\$75 ea	Northern	Carol
07/27/17	11:37	Border	3	\$80	Northern	Carol
07/27/17	4:07	Border	9	\$200	Northern	Carol
07/27/17	6:28	Border	1	\$75	Northern	Carol
07/27/17	8:25	Roxham Road	1	\$75	Northern	Carol
07/28/17	2:33	Roxham Road 1 group		\$75	Northern	Carol
07/28/17	4:28	Roxham Road 2 groups		\$75	Northern	Carol

07/28/17	2:27	Border	1	\$75	Northern	Carol
07/28/17	7:06	Border	2	\$100	Northern	Carol
07/29/17	1:56	Roxham Road	3 cabs	\$50 ea	Northern	Carol
07/29/17	4:48	Roxham Road	3 cabs	\$75	Northern	Carol
07/29/17	6:13	Roxham Road	2 people/4 peo	\$75/\$100	Northern	Carol
07/29/17	4:03	Border	3	\$150	Northern	Carol
07/29/17	6:12	Border	4	\$100	Northern	Carol
07/29/17	6:19	Border	3 families	\$100	Northern	Carol
07/30/17	1:11	Roxham Road	2 vans	\$75 each	Northern	Carol
07/30/17	2:43	Roxham Road	3 groups	\$75 each	Northern	Carol
07/30/17	8:24	Border	5	\$100	Northern	Carol
07/30/17	1:32	Border	4	\$50 ea	Northern	Carol
07/30/17	2:45	Border	2 vans	\$300	Northern	Carol
07/30/17	2:45	Border	2 loads	\$200	Northern	Carol
07/30/17	5:35	Border	7	\$150	Northern	Carol
07/30/17	8:52	Roxham Road	2 groups	\$75 each	Northern	Carol
07/31/17	1:36	Roxham Road	4 groups	2@\$50/2@\$75	Northern	Carol
07/31/17	7:01	Roxham Road	1 group	\$75	Northern	Carol
07/31/17	7:01	Roxham Road	6 ind.	\$50ea	Northern	Carol
08/01/17	3:55	Roxham Road	1 family	\$75	Northern	Carol
08/01/17	3:55	Roxham Road	1 family	\$75	Northern	Carol
08/01/17	3:55	Roxham Roadh	2 fam/2ind	\$75/\$40	Northern	Carol
08/01/17	1:45	Roxham Road	1	\$75	Northern	Carol
08/01/17	2:50	Border	4	\$200 w/tip	Northern	Carol
08/01/17	6:33	Border	5A/6chil	\$250 w/tip	Northern	Carol
08/01/17	8:15	Border	2 groups	\$75 ea	Northern	Carol
08/02/17	4:57	Roxham Road	2 ind.	\$50 ea	Northern	Carol
08/02/17	4:57	Roxham Road	1 family	\$75	Northern	Carol
08/02/17	4:58	Roxham Road	3 ind.	\$50	Northern	Carol
08/02/17	4:58	Roxham Road	1 family	\$75	Northern	Carol
08/02/17	12:10	Roxham Road	1 family	\$75	Northern	Carol
08/02/17	12:01	Roxham Road	1 family	\$175	Northern	Carol
08/02/17	6:28	Roxham Road	3	\$150 w/tip	Northern	Carol
08/02/17	9:32	Roxham Road	2 ind.	\$50 ea	Northern	Carol
08/02/17	9:32	Roxham Road	1 family	\$75	Northern	Carol
08/03/17	3:35	Roxham Road	1	\$50	Northern	Carol
08/03/17	3:35	Roxham Road	4	\$75	Northern	Carol
08/03/17	7:38	Border	4	\$50 ea	Northern	Carol
08/03/17	7:45	Roxham Road	4	\$50	Northern	Carol
08/04/17	5:59	Roxham Road	2 fam./3vans	\$75	Northern	Carol
08/05/17	2:00	Roxham Road	2	\$50	Northern	Carol
08/05/17	2:00	Roxham Road	3	\$75	Northern	Carol
08/05/17	2:00	Roxham Road	7	\$75	Northern	Carol
08/05/17	6:18	Roxham Road	3 ind.	\$30	Northern	Carol
08/05/17	6:18	Roxham Road	3 ind.	\$30	Northern	Carol

08/05/17	6:18	Roxham Road	2 fam/1 ind.		\$75/\$40	Northern	Carol
08/05/17	7:11	Roxham Road	2 fam/3 ind.		\$75/\$40	Northern	Carol
08/05/17	7:11	Roxham Road	2 families		\$75	Northern	Carol
08/05/17	3:39	Roxham Road		4	\$75/\$25 tip	Northern	Carol
08/05/17	3:39	Roxham Road		1	\$50	Northern	Carol
08/05/17	7:13	Roxham Road		5	\$40	Northern	Carol
08/05/17	7:13	Roxham Road		5	\$40	Northern	Carol
08/05/17	1:07	Roxham Road		3	\$50	Northern	Carol
08/06/17	3:50	Roxham Road		1	\$50	Northern	Carol
08/06/17	5:53	Roxham Road	4 ind.		\$50 ea	Northern	Carol
08/06/17	7:12	Roxham Road		5		Northern	Carol
08/06/17	9:00	Roxham Road	2 fam		\$75	Northern	Carol
08/07/17	1:21	Roxham Road	6 groups		\$50 ea	Northern	Carol
08/07/17	5:26	Roxham Road		5	\$50 ea	Northern	Carol
08/07/17	5:26	Roxham Road		3	\$50	Northern	Carol
08/07/17	5:26	Roxham Road	1 family		\$75	Northern	Carol
08/07/17	7:50	Roxham Road	4 families		\$75 ea	Northern	Carol
08/07/17	9:28	Roxham Road		3	\$40	Northern	Carol
08/07/17	9:28	Roxham Road	1 family		\$75	Northern	Carol
08/08/17	9:02	Roxham Road	1 fam/1 ind		\$75/\$35	Northern	Carol
08/08/17	10:59	Roxham Road	2 fares		\$50	Northern	Carol
08/09/17	5:08	Roxham Road		5	\$50 ea	Northern	Carol
07/31/17	4:20	Roxham Road	4 ind.		\$40 ea	Northern	Carol
08/01/17	12:27	Border	family of 3		\$75	Northern	Carol
08/03/17	3:30	Roxham Road	3 families		\$150 total	Northern	Carol
08/10/17	3:07	Roxham Road	5 groups		\$40 ea	Northern	Carol
08/10/17	5:30	Roxham Road	1 family		\$75	Northern	Carol
08/10/17	5:30	Roxham Road		1	\$50	Northern	Carol
08/12/17	2:36	Roxham Road	3 ind.		\$30 ea	Northern	Carol
08/13/17	2:53	Roxham Road	2 families		\$75 ea	Northern	Carol
08/13/17	4:23	Roxham Road	4 ind.		\$30 ea	Northern	Carol
08/13/17	4:23	Roxham Road	1 family		\$75	Northern	Carol
08/13/17	7:24	Roxham Road	1 family		\$75	Northern	Carol
08/13/17	3:58	Roxham Road	1 ind		\$40	Northern	Carol
08/13/17	3:58	Roxham Road	1 family		\$70	Northern	Carol
08/13/17	6:29	Roxham Road	2 families		\$60 ea	Northern	Carol
08/14/17	12:05	Roxham Road		1	\$75	Northern	Carol
08/14/17	10:08	Roxham Road	1 family		\$75	Northern	Carol
08/14/17	10:08	Roxham Road	2 ind.		\$40 ea	Northern	Carol
08/14/17	10:08	Roxham Road	4 ind.		\$30 ea	Northern	Carol
08/14/17	10:08	Roxham Road	1 family		\$75	Northern	Carol
08/15/17	10:11	Roxham Road		1	\$60	Northern	Carol
08/15/17	1:49	Roxham Road	3 families		\$75 ea	Northern	Carol
08/15/17	2:54	Roxham Road	4 ind.		\$40 ea	Northern	Carol
08/16/17	3:07	Roxham Road	1 family		\$75	Northern	Carol

08/16/17	3:07	Roxham Road	1 ind.		\$40	Northern	Carol
08/16/17	3:11	Roxham Road	2 ind.		\$40	Northern	Carol
08/16/17	4:40	Roxham Road	1 family		\$75	Northern	Carol
08/16/17	4:40	Roxham Road	1 ind.		\$25	Northern	Carol
06/16/17	6:28	Roxham Road	1 family		\$75	Northern	Carol
06/16/17	6:28	Roxham Road	1 ind.		\$40	Northern	Carol
08/17/17	12:39	Roxham Road	1 family		\$75	Northern	Carol
08/17/17	12:39	Roxham Road	1 ind.		\$25	Northern	Carol
08/17/17	1:45	Roxham Road	1 family		\$75	Northern	Carol
08/17/17	3:46	Roxham Road		2	\$50 ea	Northern	Carol
08/17/17	6:15	Roxham Road		2	\$50 ea	Northern	Carol
08/18/17	3:06	Roxham Road	1 family		\$75	Northern	Carol
08/18/17	3:06	Roxham Road	4 ind.		\$30	Northern	Carol
08/18/17	6:52	Roxham Road	2 ind.		\$40 ea	Northern	Carol
08/20/17	12:05	Roxham Road		1	\$60	Northern	Carol
08/20/17	2:47	Roxham Road	2 families		\$75	Northern	Carol
08/20/17	2:47	Roxham Road	1 ind.		\$50	Northern	Carol
08/20/17	6:40	Roxham Road	1 family		\$75	Northern	Carol
08/21/17	11:05	Roxham Road		1	\$75	Northern	Carol
08/21/17	1:50	Roxham Road	1 family		\$75	Northern	Carol
08/21/17	2:57	Roxham Road	1 Family		\$75/\$5 tip	Northern	Carol
08/23/17	8:01	Roxham Road	2 ind.		\$50 ea	Northern	Carol
08/24/17	5:18	Roxham Road	4 ind.		\$35 ea	Northern	Carol
08/24/17	5:18	Roxham Road	3 ind.		\$30 ea	Northern	Carol
08/25/17	7:30	Roxham Road	1 family		\$75	Northern	Carol
08/25/17	7:30	Roxham Road	3 ind.		\$40 ea	Northern	Carol
08/26/17	12:40	Roxham Road	1 family		\$75	Northern	Carol
08/27/17	1:51	Roxham Road	1 family		\$75	Northern	Carol
08/27/17	1:51	Roxham Road	2 ind.		\$40 ea	Northern	Carol
08/27/17	7:59	Roxham Road	1 family		\$75	Northern	Carol
08/28/17	1:24	Roxham Road	2 ind.		\$50 ea	Northern	Carol
08/29/17	6:55 a.m.	Roxham Road	4 ind.		\$30 ea	Northern	Carol
08/30/17	12:35 a.m.	Roxham Road	1 ind.		\$35	Northern	Carol

SUPREME COURT: STATE OF NEW YORK
COUNTY OF CLINTON

G

THE PEOPLE OF THE STATE OF NEW YORK,
By Eric T. Schneiderman, Attorney General,
Petitioners,

against

CHRISTOPHER CROWNSHIELD,
d/b/a/ Northern Taxi,
Respondent

**AFFIDAVIT OF
LYNN DECOTEAU**

Index No. 2017-0796

Lynn Decoteau, being duly sworn, deposes and says:

1. Beginning March 29, 2018 through today, I have been employed as Secretary in the Plattsburgh Regional Office of the New York State Attorney General.

2. As Secretary my assigned phone number is 518.562.3288. I answer this phone during normal business hours and check messages which come in during other hours.

3. I was previously informed by AAGIC Glen Michaels that it is possible that I might receive a phone call from Christopher Crowningshield or one of his taxi drivers reporting a trip to the border.

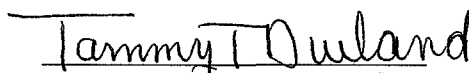
4. However, at no time during my employment here have I received such a phone call or taken a voicemail message reporting a taxi ride to the border.

5. I was at work on November 13 and November 14 of this year, during which time investigators from the Office of the Attorney General were taking taxi rides to the border in cabs owned by Christopher Crowningshield. I received no phone call or phone message reporting a ride to the border on either of these days.

6. I have consulted with all other staff of the Plattsburgh Regional Office and none of the other staff who have the ability to answer 518.562.3288 report having received any such phone call or message regarding a taxi ride to the border, either on November 13-14 or at any other time.


Lynn Decoteau

Sworn to before me this
19th day of December 2018


Notary Public

TAMMY T. DURLAND
Notary Public, State of New York
Qualified in Essex County
No. 01DU6322420
Commission Expires April 6, 20 19

H

SUPREME COURT: STATE OF NEW YORK
COUNTY OF CLINTON

THE PEOPLE OF THE STATE OF NEW YORK,
By Eric T. Schneiderman, Attorney General,
Petitioners,

against

CHRISTOPHER CROWNSHIELD,
d/b/a/ Northern Taxi,
Respondent

**AFFIDAVIT OF
ROBERT POMPEY-GOODMAN**

Index No. 2017-0796

Robert Pompey-Goodman, being duly sworn, deposes and says:

1. I am an investigator employed by the Office of the New York State Attorney General Barbara D. Underwood (hereinafter "OAG").

2. The facts set forth in this affidavit are the results of an undercover investigation I performed in the course of my duties.

3. All statements, unless otherwise noted, are based upon my personal knowledge and observation.

4. November 13 and 14, 2018, I participated in an undercover investigation into taxi vehicles operated in the Plattsburgh, New York, area by Christopher Crowningshield under the names "Northern Taxi" and "Chris's Shuttle Service."

5. On the afternoon of Tuesday, November 13, 2018, I was dropped off by other OAG investigators at the Mountain Mart on Route 9 just north of the City of Plattsburgh. This convenience store and gas station serves as a pick-up and drop-off for Greyhound bus passengers traveling to and from Plattsburgh. I had one piece of luggage with me.

6. I approached a small bus with the name "Northern Taxi" on its side and asked the driver if he would take me to "Roxham Road." Roxham Road is known to me and other OAG

investigators to be an area where persons fleeing the United States and seeking asylum in Canada often cross the border on foot.

7. The driver told me to get in the bus and sit down. Another person, unknown to me and not another OAG investigator, also got in the bus.

8. After getting in the bus, the driver told me and the other passenger, "Don't worry. I'll take you to border; but first I have to go to my boss's home and get my taxi. This bus is too big, uses too much gas for just two people. I was supposed to pick up a family of ten but I guess they didn't make it."

9. The driver took me and the other passenger to 188 Sand Road in Morrisonville, where the driver told me, "This is my boss's place."

10. When we stopped at 188 Sand Hill Road, I observed two Chrysler Pacifica minivans with signage indicating "Chris's Shuttle Service" and the phone number 534-5166.

11. At the direction of the driver, I and the other passenger exited the bus and got into one of the white-colored Chrysler Pacifica minivans, this one with NY license plate number 39051 LV (livery). The driver put our luggage in the back.

12. Before we left a man in a cap came out of the house. The driver called him "Chris" and told me and the other passenger that it was OK; this man was his boss.

13. From photos I had previously been shown by other OAG investigators, I recognized the man in the cap as the Respondent in this proceeding, Christopher Crowningshield. The man looked into the van and exchanged words with the driver, something about there being only two passengers.

14. The driver left 188 Sand Road and headed to Roxham Road. I rode in the seat behind the driver. I thoroughly scanned the interior of the vehicle, but I did not observe any poster or signage in the interior of the van indicating the fares to be charged.

15. During the travel to Roxham Road, the driver made a radio call to "Chris" and then informed me that my fare to Roxham Road would be \$100. I handed the driver \$100 in cash. I observed the other passenger also pay the driver \$100 in cash. The driver did not offer or give me a receipt.

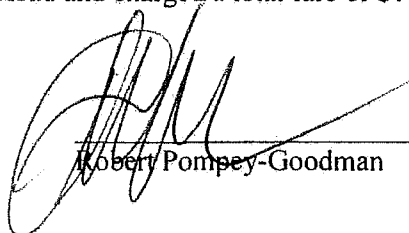
16. The driver took me and the other passenger to the end of Roxham Road, close to the Canadian border, where I and the other passenger took our luggage and exited the vehicle.

17. On the afternoon of November 14, 2018, I was again dropped off at the Mountain Mart on Route 9, just north of the City of Plattsburgh.

18. OAG Investigator Crystal Combs and I approached a white colored minivan with license plate number 18437-TY (Livery) and bearing the signage "Chris's Shuttle Service." We asked the driver if he could take us to Roxham Road.

19. The driver told us to get in the van, and we did so. I looked carefully but could not see any sign or poster indicating the fares to be charged.

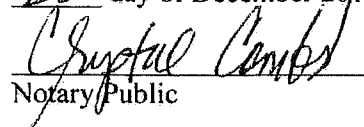
20. The driver took us to Roxham Road and charged a total fare of \$100 for the two of us. He did not offer a receipt.



Robert Pompey-Goodman

Sworn to before me this

20th day of December 2018



Notary Public

CRYSTAL COMBS
Notary Public, State of New York
No. 01CO6196460
Qualified in Kings County
Commission Expires 11/17/2020

STATE OF NEW YORK
SUPREME COURT : COUNTY OF CLINTON

PEOPLE OF THE STATE OF NEW YORK, by
BARBARA D. UNDERWOOD, Attorney General of the
State of New York,

Petitioners,
- against -

CHRISTOPHER CROWNINGSHIELD
d/b/a NORTHERN TAXI
d/b/a CHRIS'S SHUTTLE SERVICE
Respondent.

**AFFIDAVIT OF
JUSTIN REBIDEAU**
Index No. 2017-0796

STATE OF NEW YORK)
COUNTY OF CLINTON) ss.:

Justin E. Rebideau, being duly sworn, deposes and says:

1. I am an Investigator employed by the Office of the New York State Attorney General Barbara D. Underwood (hereinafter "AG" or "OAG").
2. The facts set forth in this affidavit are the results of an investigation I performed in the course of my job duties.
3. All statements are based upon my personal knowledge and investigation.
4. On November 13, 2018 and November 14, 2018 I participated in an undercover investigation by the OAG into taxi vehicles operated in the Plattsburgh, New York area by Christopher Crowningshield under the names "Northern Taxi" and "Chris's Shuttle Service."
5. On the afternoon of Tuesday, November 13, 2018 OAG Investigator Robert Pompey-Goodman was dropped off by another OAG Investigator at the Mobil Mountain Mart (7155 US 9, Plattsburgh, NY 12901) on Route 9 just north of the City of Plattsburgh. I observed parked at the Mobil Mountain Mart a small bus or shuttle van, white in color, with pink striping, prominently displaying the words "NORTHERN TAXI" on a side window and on the front quarter of the vehicle.

6. I did not photograph the bus on November 13, 2018. However, I have attached as Exhibit 1 to this Affidavit a copy of a publicly available photograph from a Reuters News Agency article showing a true and accurate photograph, taken February 14, 2018 of the same bus, displaying the same signage ("NORTHERN TAXI"), which I saw parked at the Mobil Mountain Mart on November 13, 2018. The full Reuters article is available at:

<https://www.reuters.com/article/us-trump-effect-canada-immigration/collateral-damage-how-trump-threw-canadas-refugee-system-into-turmoil-idUSKBN1GV0WQ?feedType=RSS&feedName=politicsNews>

7. On the afternoon of November 13, 2018 I observed OAG Investigator Robert Pompey-Goodman get into this bus labeled "NORTHERN TAXI".

8. In December 2018, I was asked by Assistant Attorney General in Charge (AAGIC) Glen F. Michaels of the OAG Plattsburgh Regional Office to confirm the registration details and description of three vehicles believed to be owned and operated by the above stated Respondent, Christopher Crowningshield. I ran a Registration Group Search for Mr. Crowningshield on the eJusticeNY Integrated Justice Portal, reviewed evidence obtained by the OAG in the November 13, 2018 and November 14, 2018 undercover investigation, and conducted an open source online investigation confirming the following information.

9. The vehicle registered under plate number 39051-LV is a 2005, Chrysler Pacifica, white in color, registered to a C. R. Crowningshield, 188 Sand Road, Morrisonville, NY 12962. As of November 14, 2018 this vehicle had black lettering on the side of the vehicle stating "Chris's Shuttle Service" with a yellow sign on top of the vehicle containing black and white lettering stating "Northern Taxi". A copy of a screenshot of a video taken during the course the OAG undercover investigation on November 14, 2018 in this matter, depicting this vehicle as described is attached hereto as Exhibit 2.

10. The vehicle registered under plate number 18437-TY is a 2007, Chrysler Town & Country, white in color, registered to a C. R. Crowningshield, 188 Sand Road, Morrisonville, NY 12962. As of November 14, 2018 this vehicle had orange lettering on the side of the vehicle stating "Chris's Shuttle" with a yellow sign on top of the vehicle containing black and white lettering stating "Northern Taxi". A copy of a screenshot of a video taken during the course the OAG undercover investigation on November 14, 2018 in this matter, depicting this vehicle as described is attached hereto as Exhibit 3.

11. The vehicle registered under plate number 29437-LV is a 2010, Ford E-350 Bus, white in color, registered to a C. R. Crowningshield, 188 Sand Road, Morrisonville, NY 12962. As of November 13, 2018 this vehicle had a pink stripe on the side of the vehicle with black lettering stating "SHUTTLE", black lettering on the front quarter of the vehicle stating "NORTHERN TAXI", and white lettering on a side window of the vehicle stating "NORTHERN TAXI". A copy of a second publicly available photograph from the Reuters News Agency article previously referenced, showing a true and accurate photograph, taken February 14, 2018 of the vehicle registered under plate number 29437-LV, depicting this vehicle as described is attached hereto as Exhibit 4.

12. On the morning of December 20, 2018 AAGIC Michaels and myself met with Christopher Crowningshield in the Examination Before Trial room of the Plattsburgh Regional Office of the Attorney General, 43 Durkee Street, Suite 700, Plattsburgh, NY.

13. AAGIC Michaels asked me to sit in on the meeting between him and Mr. Crowningshield, the purpose of which was to inspect records of Mr. Crowningshield's taxi business, which had been requested by AAGIC Michaels the day before, and to receive from Mr. Crowningshield the balance of funds owed to the Attorney General.

14. In this meeting, which began at approximately 9:30am, AAGIC Michaels asked Mr. Crowningshield whether he had any records for us to inspect. Mr. Crowningshield said that he did not, explaining that "There is no more Northern Taxi...It's Chris's Shuttle Service."

15. AAGIC Michaels asked Mr. Crowningshield "Who owns Chris's Shuttle Service?" Mr. Crowningshield replied, "Me."

16. Mr. Crowningshield presented AAGIC Michaels and myself with a copy of a Business Certificate dated and filed in Clinton County on January 25, 2018 showing that he, Mr. Crowningshield, was doing business under the name "Chris's Shuttle Service."

17. AAGIC Michaels asked Mr. Crowningshield if he had the \$1,500 balance of the remaining money due to the AG under the previous Court Order. Mr. Crowningshield seemed to indicate he had this amount of money but needed most of it for maintenance of his vehicles. He said that he could arrange to borrow some funds and pay the AG.

18. AAGIC Michaels asked Mr. Crowningshield again if he had any of the records he was required to keep regarding trips to the border. Mr. Crowningshield said that he did not and further stated that the drivers kept their own records.

19. AAGIC Michaels asked Mr. Crowningshield if he himself had ever driven the bus. Mr. Crowningshield replied, "Yeah". AAGIC Michaels then asked Mr. Crowningshield if the bus said "Northern Taxi" on it. Mr. Crowningshield indicated that it did not, that it was labeled "Chris's Shuttle Service." AAGIC Michaels further inquired as to the regularity with which Mr. Crowningshield had driven the bus. Mr. Crowningshield explained that he had not driven in the last 3 months, but later admitted he had regularly done so before then. Mr. Crowningshield later indicated that he himself had not been driving recently due to health issues.

20. AAGIC Michaels asked Mr. Crowningshield if he had made any calls to the AG's Office since August 2017 regarding trips to the border. Mr. Crowningshield replied,

“No”. When asked why he had stopped, Mr. Crowningshield explained that “I changed the name and stuff...I mean nobody else does it”.

21. AAGIC Michaels asked Mr. Crowningshield if the bus had a sign indicating fares to the border. Mr. Crowningshield said that the sign listed the fare as \$100 for one person, \$50 each for two persons, and an additional \$50 for each additional person.

22. AAGIC Michaels asked Mr. Crowningshield if Chris’s Shuttle Service used the same phone number as Northern Taxi. Mr. Crowningshield said that it did.

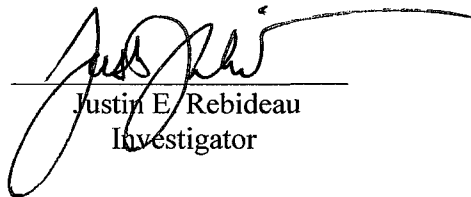
23. AAGIC Michaels advised Mr. Crowningshield to consult with an attorney.

24. AAGIC Michaels made a copy of Mr. Crowningshield’s business certificate for Chris’s Shuttle Service and returned it to Mr. Crowningshield.

25. At that point, Mr. Crowningshield left the office.

26. The above conversation on December 20, 2018 which took place in the Examination Before Trial room of the Plattsburgh Regional Office of the Attorney General, 43 Durkee Street, Suite 700, Plattsburgh, NY was recorded using a covert audio recording device.

Date: December 21, 2018


Justin E. Rebideau
Investigator

Sworn to before me
this 21 day of December, 2018


NOTARY PUBLIC-STATE OF NEW YORK

TAMMY T. DURLAND
Notary Public, State of New York
Qualified in Essex County
No. 01DU6322420
Commission Expires April 6, 2019

EXHIBIT 1

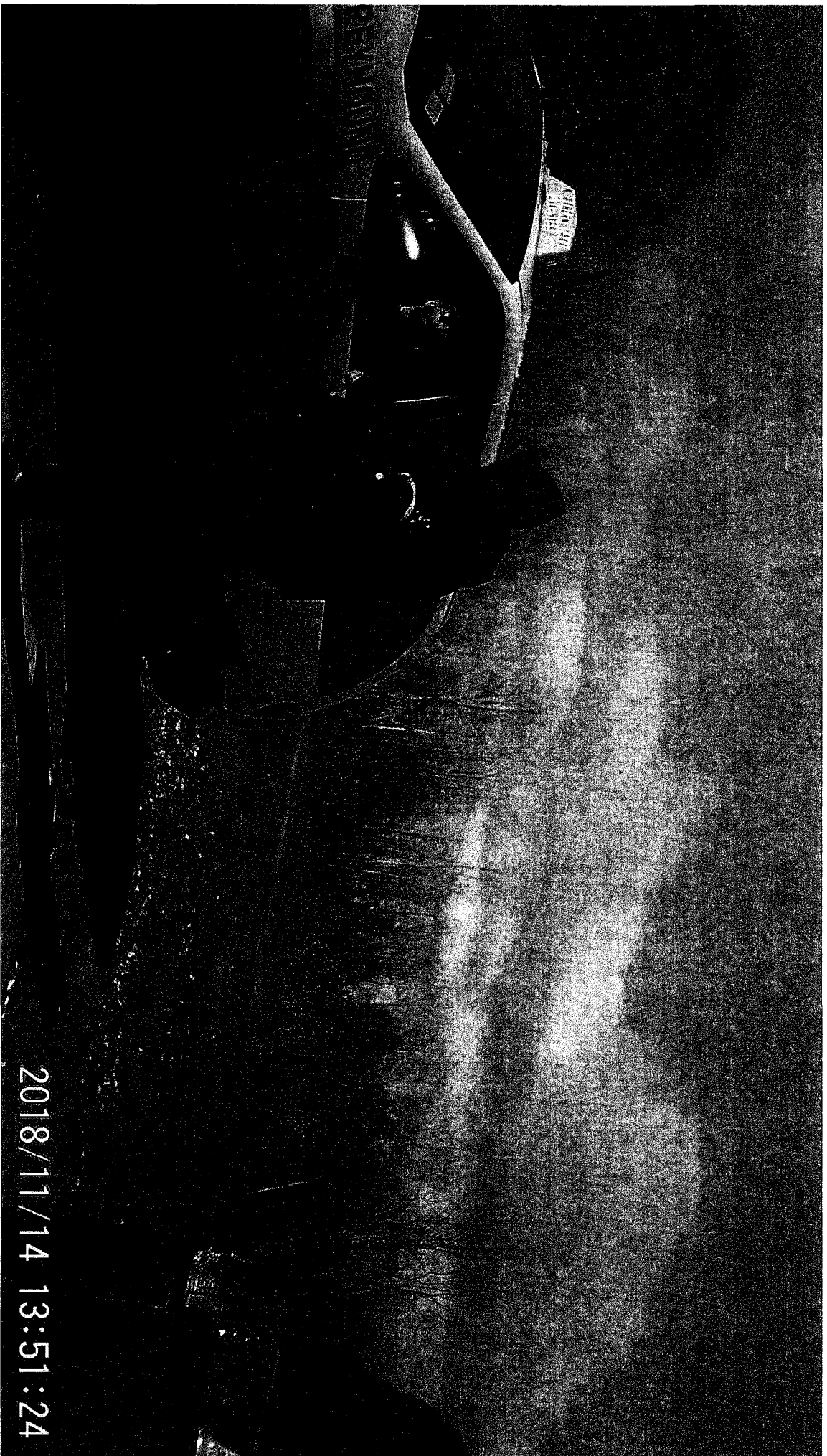


EXHIBIT 2



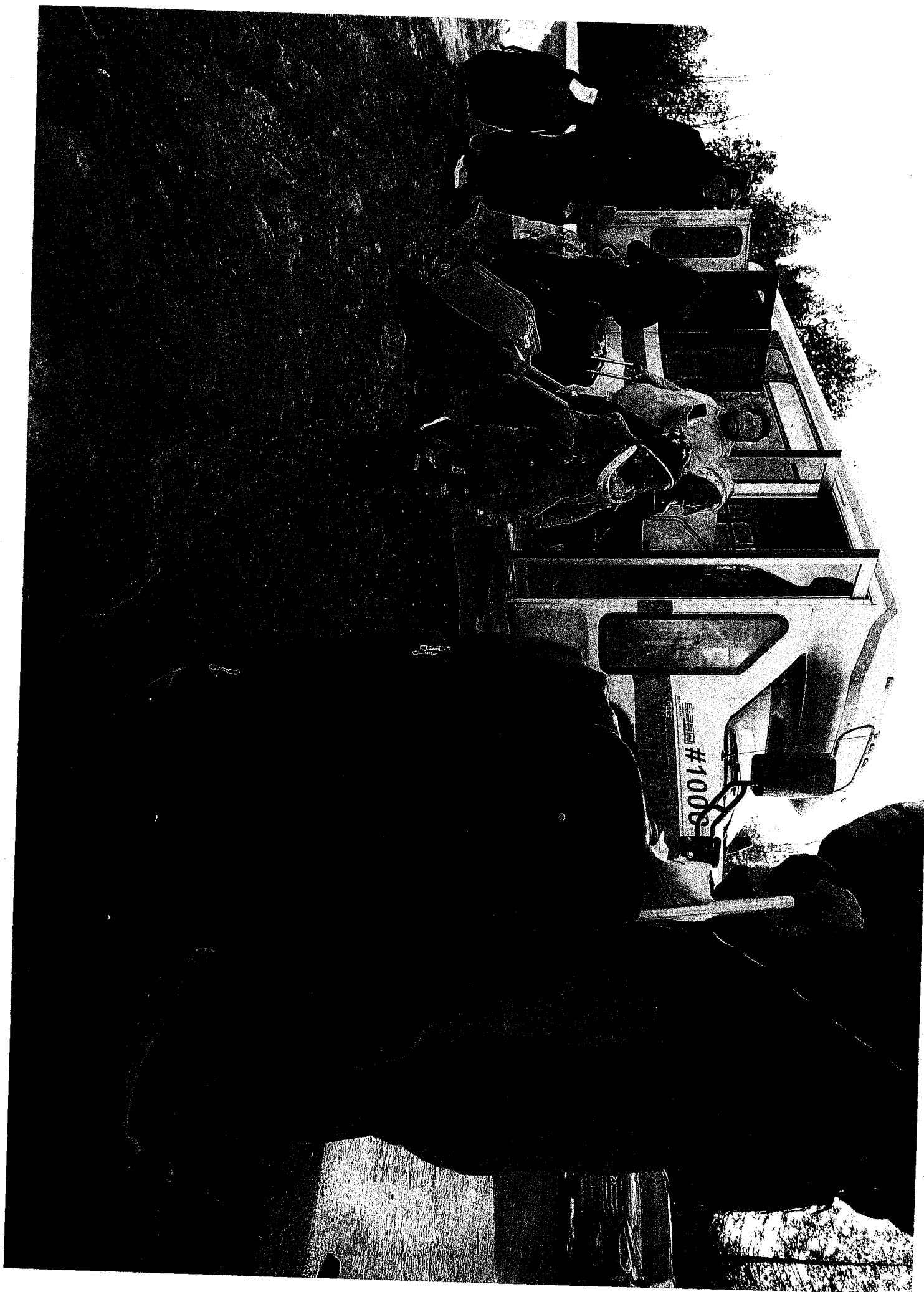
2018/11/14 10:41:50

EXHIBIT 3



2018/11/14 13:51:24

EXHIBIT 4



**SUPREME COURT: STATE OF NEW YORK
COUNTY OF CLINTON**

THE PEOPLE OF THE STATE OF NEW YORK,
By Eric T. Schneiderman, Attorney General,
Petitioners,

against

CHRISTOPHER CROWNINGSHIELD,
d/b/a/ Northern Taxi,
Respondent

**AFFIDAVIT OF
CRYSTAL COMBS**

Index No. 2017-0796

Crystal R. Combs, being duly sworn, deposes and says:

1. I am an investigator employed by the Office of the New York State Attorney General Barbara D. Underwood.
2. The facts set forth in this affidavit are the results of an undercover investigation I performed in the course of my duties.
3. All statements, unless otherwise noted, are based upon my personal knowledge and observation.
4. November 14, 2018, I participated in an undercover investigation into taxi vehicles operated in the Plattsburgh, New York, area by Christopher Crowningshield under the names "Northern Taxi" and "Chris's Shuttle Service."
5. On the morning of Wednesday, November 14, 2018, I called Northern Taxi at 518.534.7166 and requested a ride from the Super 8 Motel on Route 9 North of Plattsburgh to the "Roxham Road" border crossing.
6. A few minutes later a white colored Chrysler Pacifica SUV with license number 39051-LV and black lettering stating "Chris's Shuttle Service" pulled up outside the Super 8 and I got in.

7. I did not observe any poster or signage in the interior of the van indicating the fares charged.

8. The driver called a number and reported that he had one passenger going to Roxham Rd and the fare to be charged was \$100.

9. At my direction the driver took me to the end of Roxham Road, in the Town of Champlain, Clinton County. While seated in the taxi having small talk with the driver he stated he had made over 8 trips to "Roxham Road" the previous day to passengers wanting to cross the border.

10. He charged me a fare of \$100, which I paid. He did not offer me a receipt.

11. On the afternoon of November 14, I was dropped off at the Mountain Mart on Route 9 just north of the City of Plattsburgh. This convenience store and gas station serves as a pick-up and drop-off for Greyhound bus passengers traveling to and from Plattsburgh.

12. Investigator Robert Pompey-Goodman and I approached a white colored minivan with license plate number 18437-TY bearing the signage "Chris's Shuttle Service" we asked the driver if he could take us to Roxham Road.

13. The driver told us to get in the van and we did so. I looked carefully but could not see any sign or poster indicating the fares to be charged.

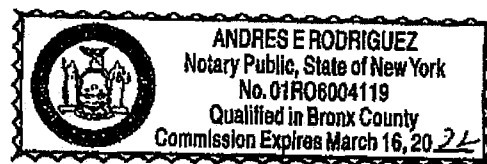
14. The driver took us to Roxham Road and charged a total fare of \$100 for the two of us. He did not offer a receipt.

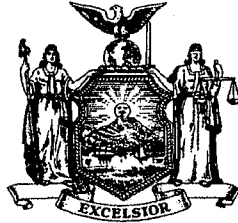
Crystal R. Combs
Crystal R. Combs

Sworn to before me this

19 day of December 2018

[Signature]
Notary Public





K

State of New York
Office of the Attorney General

BARBARA D. UNDERWOOD
ATTORNEY GENERAL

PLATTSBURGH
REGIONAL OFFICE

December 19, 2018

Hand-Delivered

Christopher Crowningshield
188 Sand Road
Morrisonville, NY 12962

Re: Consent Order and Judgment May 5, 2018

Dear Mr. Crowningshield:

As you will note from pp 3-4 of the attached Court Order which you were served with in Mid-May 2017 and from the Stipulation you signed on May 3, 2017, you are required to make available for inspection by the Attorney General, within 24 hours, copies of each quote or receipt given to passengers traveling to the border on a vehicle owned operated or leased by you. The Attorney General demands that you present these **no later than noon tomorrow, December 20, 2018, at 43 Durkee Street, Suite 700, Plattsburgh, New York.**

In addition, you have not paid the \$2,500 costs and penalties ordered to be paid. My office has receipts showing that you made two payments, one for \$400 and one for \$600 for a total of \$1,000. The remaining balance of \$1,500 has not been paid and is now due and payable. Please bring this with you tomorrow.

Sincerely,

Glen Francis Michaels
Assistant Attorney General in Charge
<glen.michaels@ag.ny.gov>

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF CLINTON

THE PEOPLE

OF THE STATE OF NEW YORK,

by BARBARA D. UNDERWOOD, Attorney General
Petitioner,

AFFIDAVIT OF SERVICE

Index No. 2017-0796

- against -

CHRISTOPHER CROWNSHIELD,

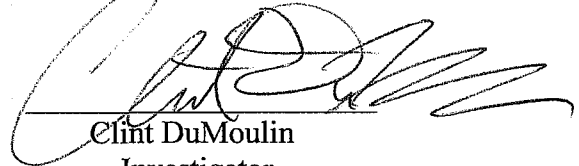
d/b/a Northern Taxi and Chris's Shuttle Service
Respondent,


STATE OF NEW YORK)
COUNTY OF CLINTON) ss.:

Clint DuMoulin, being duly sworn, deposes and says that he is not a party to the action listed above, is over 18 years of age, and is employed by the New York State Attorney General's Office. Deponent served the attached **Demand Letter** on Christopher Crowningshield, by personally delivering a true copy thereof to him on December 19th, at 11:20am, at the address of 188 Sand Road, Morrisonville, NY 12962.

Deponent describes Christopher Crowningshield as a Caucasian male, approximately 55 years of age, approximately 71 inches tall, weighing approximately 190 pounds, and having black hair. Deponent further states, on information and belief, that said Christopher Crowningshield is not on active duty with the Armed Forces of the United States.

Sworn to before me
this 19th day of December, 2018


Clint DuMoulin
Investigator


NOTARY PUBLIC-STATE OF NEW YORK

TAMMY T. DURLAND
Notary Public, State of New York
Qualified in Essex County
No. 01DU6322420
Commission Expires April 6, 2019