

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF FAIRFAX
Civil Division

FILED
CIVIL INTAKE

2014 JUL 18 AM 10:25

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

L AND Z TRANSPORTATION, INC.,
d/b/a WHITE TOP CAB COMPANIES,
ALEXANDRIA WHITE TOP AND
FAIRFAX WHITE TOP,

Plaintiff,

and

M & R TAXI COMPANY, INC., d/b/a
ARLINGTON BLUE TOP CABS,

Plaintiff,

and

STAFFORD LIMOUSINE, INC., d/b/a
LOVE LIMOUSINE,

Plaintiff,

and

SONBERZ INC. d/b/a VIP CAB
COMPANY

Plaintiff

and

NORTHERN VIRGINIA CHECKER
CAB, LLC

Plaintiff

and

C&C TRANSPORTATION, INC. d/b/a
PRINCE WILLIAM YELLOW CAB

Plaintiff

and

KING CAB COMPANY, INCORPORATED

Plaintiff

v.

UBER TECHNOLOGIES, INC., d/b/a

2014 - 09452

CIVIL CASE NO.: _____

UBER, UBERX, UBER DC, and/or)
UBER VIRGINIA,)
SERVE: Travis Kalanick, CEO)
182 Howard Street, Suite 8)
San Francisco, CA 94105)
Defendant,)
and)

RAISER LLC, d/b/a UBER, UBERX,)
UBER DC, and/or UBER VIRGINIA,)
SERVE: National Registered Agents, Inc.)
4701 Cox Rd Ste 285)
Glen Allen, VA 23060)
Defendant,)
and)

DRINNEN, LLC, d/b/a UBER, UBERX,)
UBER DC, and/or UBER VIRGINIA,)
SERVE: National Registered)
Agents, Inc.)
4701 Cox Rd Ste 285)
Glen Allen, VA 23060)
Defendant,)
and)

LYFT, INC.,)
SERVE: Joseph Okpaku, Director)
548 Market Street #68514)
San Francisco, CA 94104)
Defendant,)
and)

DEPARTMENT OF MOTOR)
VEHICLES OF THE COMMONWEALTH)
OF VIRGINIA)
Serve: Richard D. Holcomb)
Commissioner)
Department of Motor)
Vehicles of the)
Commonwealth of)
Virginia)
2300 West Broad Street)
Richmond, VA 23269)

COMPLAINT

Plaintiffs, L AND Z TRANSPORTATION, INC., M & R TAXI COMPANY, INC., STAFFORD LIMOUSINE, INC., SONBERZ, INC., NORTHERN VIRGINIA CHECKER CAB, LLC, C&C TRANSPORTATION, INC., and KING CAB COMPANY, INCORPORATED by counsel, state as follows as and for their complaint:

1. Plaintiff L and Z Transportation, Inc. (“Alexandria White Top” and “Fairfax White Top”) is a Virginia stock corporation with a principal place of business in Alexandria, Virginia. L and Z Transportation, Inc. does business as Alexandria White Top and Fairfax White Top, and has been providing taxicab services for over forty years in the City of Alexandria and Fairfax County, Virginia with approximately 150 registered vehicles and contracted drivers.

2. Plaintiff M & R Taxi Company, Inc. (“Arlington Blue Top”) is a Virginia stock corporation with a principal place of business in Falls Church, Virginia. M & R Taxi Company, Inc. does business as Arlington Blue Top Cabs, and has been providing taxicab services for over thirty years in Arlington County, Virginia, with a fleet of approximately 150 registered vehicles and contracted drivers.

3. Plaintiff Stafford Limousine, Inc. (“Love Limousine”) is a Virginia stock corporation with a principal place of business in Richmond, Virginia. Stafford Limousine, Inc. does business as Love Limousine, and provides limousine and town car transportation services to passengers in the City of Richmond, central Virginia, and northern Virginia.

4. Plaintiff Sonberz, Inc. (“VIP Cab Company”) is a Virginia stock corporation with a principal place of business in Alexandria, Virginia. Sonberz, Inc., is doing

business as VIP Cab Company, is a closely held corporation that has been providing taxicab services for over thirty years in Alexandria, Virginia, with a fleet of over sixty (60) registered vehicles and contracted drivers.

5. Plaintiff Northern Virginia Checker Cab, LLC (“Checker Cab”) is a Virginia limited liability company with a principal place of business in Alexandria, Virginia. Northern Virginia Checker Cab, LLC provides taxicab services throughout Prince William County, Virginia and the City of Manassas, Virginia.

6. Plaintiff C&C Transportation, Inc. (“Prince William Yellow Cab”) is a Virginia stock corporation with a principal place of business in Prince William County, Virginia. Prince William Yellow Cab provides taxicab services throughout Prince William County, Virginia and the City of Manassas, Virginia.

7. Plaintiff King Cab Company, Incorporated (“King Cab”) is a Virginia stock corporation with a principal place of business in Alexandria, Virginia and provides service throughout the City of Alexandria, Virginia and the county of Fairfax, Virginia.

8. Defendant Uber Technologies, Inc. (“Uber Technologies”) is Delaware general corporation with a principal place of business in San Francisco, California. It operates in Virginia under its own name, and also through two subsidiaries, Raiser LLC and Drinnen, LLC.

a. Defendant Raiser LLC (“Raiser”) is a Delaware limited liability company with a principal place of business in San Francisco, California. It is a wholly owned subsidiary of Uber Technologies, Inc.

b. Defendant Drinnen, LLC (“Drinnen”) is a Delaware limited liability company with a principal place of business in San Francisco, California. It is a wholly owned subsidiary of Uber Technologies, Inc.

Defendants Uber Technologies, Raiser and Drinnen will be collectively referred to herein as “Uber.”

9. Defendant Lyft, Inc. (“Lyft”) is a Delaware general corporation with a principal place of business in San Francisco, California.

10. Defendant, Department of Motor Vehicles of the Commonwealth of Virginia (“DMV”), is the administrative agency in the Commonwealth of Virginia responsible for the registration and auditing of carriers of passengers and administration of the safety responsibility laws within the Commonwealth.

11. At all pertinent times, Defendants acted by and through their agents, officers, and employees, within the scope of their agency.

Jurisdiction and Venue

12. This court has personal jurisdiction over all the Defendants pursuant to § 8.01-328.1 of the Code of Virginia, by reason of Defendants (1) transacting business in the Commonwealth; (2) contracting to supply services or things in the Commonwealth; (3) causing tortious injury by acts or omissions in this Commonwealth; (4) causing tortious injury in the Commonwealth by acts or omissions outside this Commonwealth, while regularly doing or soliciting business, or engaging in other persistent course of conduct, and/or deriving substantial revenue from services rendered, in this Commonwealth; (7) contracting to insure any person, property, or risk located within this Commonwealth at the time of contracting; and (10) having incurred a liability for taxes, fines, penalties, interest, or other charges to any political subdivision of the Commonwealth.

13. The Fairfax County Circuit Court has subject matter jurisdiction in this case pursuant to §§ 8.01-620, § 8.01-184, and 17.1-513 of the Code of Virginia.

Moreover, the Circuit Court has jurisdiction to issue injunctions in equity. The circuit court's territorial jurisdiction to issue injunctions extends throughout the Commonwealth.

14. Venue is appropriate in this court pursuant to § 8.01-262 of the Code of Virginia, including without limitation because Defendants regularly and intentionally conduct substantial business activity in Fairfax County (among other jurisdictions), and acts complained of herein derive from such activities.

Introduction

15. Defendants Uber and Lyft are illegally operating as brokers of "for-hire" passenger transportation services throughout Northern Virginia, without a valid broker's license issued by the Virginia Department of Motor Vehicles ("DMV") or any other permit or license from a local jurisdiction. Uber and Lyft were fined by DMV, and instructed by DMV to cease and desist their operations, but have willfully refused to comply with the Cease and Desist order. In so doing, Uber and Lyft are defying statutes enacted to protect the people of Virginia, and imposing illegal and injurious competition to lawful companies like Alexandria White Top, Fairfax White Top, Arlington Blue Top, Love Limousine (Stafford), VIP Cab Company (Alexandria), Checker Cab (Manassas), Prince William Yellow Cab(Prince William), and King Cab(Alexandria) which provide passenger transportation services within the same market in compliance with DMV passenger carrier regulations and local ordinances. Defendants Uber and Lyft attempt to operate "above the law," and their continuing unlawful broker operations pose an immediate and substantial risk of harm to the Alexandria White Top, Fairfax White Top, Arlington Blue Top, Love Limousine (Stafford), VIP Cab Company (Alexandria), Checker Cab (Manassas), Prince William Yellow Cab(Prince William), and King

Cab(Alexandria), and the general public.

Statement of Facts

16. Uber and Lyft commenced operations as brokers of for-hire passenger transportation services in the Commonwealth of Virginia in August 2013.

17. While the two companies presently employ different terminology in their promotional materials to describe their services, they share the following basic characteristics:

- (a) Uber and Lyft broker “for-hire” passenger transportation services, for compensation, over the highways of Virginia.
- (b) Uber and Lyft do not hold a valid broker’s license issued by the Department of Motor Vehicles, in violation of § 46.2-2001.1 of the Code of Virginia. Nor are they licensed in any jurisdiction as a taxicab or livery service, as required by state law.
- (c) All prospective customers of Uber and Lyft must first download a smartphone application (“app”) and enter into an on-line agreement under terms dictated by Uber and Lyft. Those terms include a waiver of any and all liability to Uber and Lyft.
- (d) The customer provides credit card information to Uber and Lyft.
- (e) Customers hail a car through the “app” instead of a human dispatcher. Uber and Lyft’s charges for service are calculated by the app software, based on time and distance (GPS) and billed to the customer’s credit card through the app, rather than through a state-certified taximeter.
- (f) Drivers do not directly collect the fare from the customer. Instead, Uber and Lyft charge the fares to the customer’s credit card through its app. Uber and Lyft collect a portion of the total charges (including tip) and pay the balance to the driver.
- (g) Uber and Lyft drivers are drawn from the general public and use personal vehicles which are personally insured. Uber and Lyft do not require them to pay commercial property taxes, purchase commercial auto insurance, or have local business licenses.
- (h) Uber and Lyft do not require its drivers to comply with “for-hire” passenger carrier regulations, either state or local. Drivers are screened by Uber and Lyft based on their own criteria, not through the local police

department or hack inspector. Uber claims drives need “little more than their personal vehicle to get started.”

18. Uber and Lyft’s services are in direct competition with Alexandria White Top, Fairfax White Top, Arlington Blue Top, Love Limousine, VIP Cab Company, Checker Cab, Prince William Yellow Cab, and King Cab’s services, which operate subject to state law and local ordinance, especially in northern Virginia.¹

19. The DMV is joined as a party as it has an interest in the subject of the action and is so situated that the disposition of the action in its absence may impair or impede its ability to protect its interest and that complete relief cannot be accorded without adding it as a party.

Virginia’s Passenger Carrier Law

20. In Virginia, it is illegal to operate or broker any passenger carrier service over the highways of the Commonwealth for compensation without a license, permit or certificate as authorized by state law:

§ 46.2-2001.1. License, permit, or certificate required

A. It shall be unlawful for any person to operate, offer, advertise, provide, procure, furnish, or arrange by contract, agreement, or arrangement to transport passengers for compensation as a broker, motor carrier or excursion train operator without first obtaining a license, permit, or certificate, unless otherwise exempted, as provided in this chapter.

Va. Code § 46.2-2001.1.

21. While the Code includes certain exceptions from licensure requirements, none of them are applicable to Uber and Lyft’s operations. For example, Va. Code § 46.2-2000.1(5) contains an exclusion for ride-sharing arrangements; however, the

¹ For example, Fairfax County has a taxicab ordinance that requires all operators *inter alia* to apply for a “certificate of convenience and necessity.” Fairfax White Top initially obtained these certificates in 1994. As a result of being licensed by Fairfax County, it is exempted from obtaining a “broker’s license” under § 46.2-2000.1(2) (“this chapter shall not be construed to include ... taxicabs... while operating in a county, city, or town which has or adopts an ordinance controlling taxicabs”).

statute defines ride-sharing arrangements as those which do not involve transporting passengers for profit. Uber and Lyft's operations are not ride-sharing arrangements because Uber and Lyft receive compensation for their services. *Id.* § 46.2-2000.1(5).

22. Brokers are required to obtain a broker's license, pay a license fee, and file and maintain a surety bond or letter of credit in the amount of \$25,000. *See* Va. Code § 46.2-2099.18; Va. Code § 46.2-2011.9. In addition, brokers are only allowed to arrange for the transportation of passengers with companies that are authorized by DMV to conduct such operations. Va. Code § 46.2-2099.19. If the broker arranges transportation involving a carrier that is required to hold a certificate of public convenience and necessity, the broker is required to obtain and maintain a copy of the carrier's certificate. *Id.*

Uber and Lyft's Illegal Operations

23. Uber and Lyft commenced broker operations in Northern Virginia on or about August 2013, without complying with the passenger carrier code and without obtaining a broker's license (or any license to operate a taxi service). Uber's service areas currently include, without limitation, Annandale, Fairfax, McLean, and Springfield, which are all communities in Fairfax County. On January 23, 2014, Lyft publically announced it was expanding its official service area to Alexandria and Arlington. On April 24, 2014, Lyft expanded its service again into Virginia Beach.

24. In April 2014, Uber and Lyft were fined \$26,000 and \$9,000, respectively, by the DMV, for operating in Virginia without a broker's license under § 46.2-2001.1. True and accurate copies of the DMV assessments of civil penalties are attached hereto as EXHIBIT 1 and 2. The DMV fines were based, in part, on substantial evidence compiled by DMV of numerous discrete trips brokered by Uber and Lyft in Alexandria

and Arlington, Virginia, without a license, as more fully set forth in EXHIBITS 1 and 2.

The DMV warned:

Despite DMV attempts to educate and warn Uber of the broker's license requirements and to assist Uber with the application requirements, Uber has not made application for, or subsequently been granted, the broker's license referenced in Virginia Code § 46.2-2001.1(A) and therefore is subject to a civil penalty pursuant to Virginia Code § 46.2-2011.23(4).

In the event Uber makes application for a broker's license it should be noted that continued operations without having been granted a broker's license would be in violation of Virginia law and subject to further penalty. EXHIBIT 1.

A substantially identical warning was given to Lyft. EXHIBIT 2.

25. Uber and Lyft ignored the DMV warnings and penalties and continued to operate in Virginia without a license.

26. On June 5, 2014, the DMV ordered Uber and Lyft to cease and desist their unlawful operations. The DMV cease and desist orders stated:

For over six months, the Virginia Department of Motor Vehicles (DMV) has alerted Uber Technologies, Inc. (Uber) of its requirement to obtain authority before operating in Virginia. DMV has educated Uber about Virginia's passenger carrier laws, which apply to any business that receives compensation to provide or facilitate transportation. More recently the DMV assessed a civil penalty to Uber after collecting evidence of specific instances of compensated transportation services. I am once again making clear that Uber must cease and desist operating in Virginia until it obtains proper authority. Further, DMV will issue civil penalties to Uber's drivers that do not have authority to provide transportation for compensation.

.....

Finally, please alert your drivers in Virginia that DMV will enforce laws prohibiting illegal operations by companies such as Uber and by individual drivers that lack authority to provide passenger transportation.

EXHIBIT 3 (emphasis in original). A substantially identical cease and desist order was issued to Lyft. EXHIBIT 4. (collectively, the "Cease and Desist Orders").

27. Uber and Lyft ignored the DMV Cease and Desist Orders. Officials for Uber and Lyft both issued statements to the press (reported in the Washington Post on

June 5, 2014) that “they will continue to operate in the state, despite Thursday’s order.”

28. On June 6, 2014, Uber emailed its customers that it would not comply with the Cease and Desist Order. Uber’s email states:

You may have heard that Uber received a cease and desist letter from the Virginia DMV yesterday. We wanted to write to let you know that Uber will operate as usual, and we plan to continue full-speed ahead with our commitment to providing Virginians access to safe, affordable and reliable rides.

A true and accurate copy of Uber’s email is attached hereto as EXHIBIT 5. *Id.* (Uber titled the email as: “*A Note About Uber in Virginia: You Have the Right to Ride*”). In addition, Uber continued to actively solicit customers in Virginia via their website and by emailing existing Virginia customers with a “chance to earn free rides” for “inviting friends to try Uber” – all while under and while refusing to comply with the DMV Cease and Desist Order. EXHIBIT 6. Uber further emailed its drivers on June 6, 2014, telling them to continue working in Virginia and Uber will cover any fines issued.

29. Uber and Lyft continue to actively market and operate their unlicensed, illegal transportation services in Northern Virginia. A true and accurate copy of Uber’s coverage map of service in Northern Virginia is attached hereto as EXHIBIT 7. True and accurate copies of Lyft’s coverage maps documenting service in Virginia are attached hereto as EXHIBITS 8 and 9.

30. To date, both Uber and Lyft have refused to comply with the DMV Cease and Desist Order.

31. Currently, Defendants Uber and Lyft are illegally operating as brokers of for-hire passenger transportation services without a valid broker’s license issued by the DMV or any permit issued by a local jurisdiction to authorize taxi service. In so doing, Uber and Lyft are willfully refusing to comply with Virginia’s statutes enacted to protect

the people of Virginia, and imposing illegal and injurious competition to lawful companies like Alexandria White Top, Fairfax White Top, Arlington Blue Top, Love Limousine, VIP Cab Company, Checker Cab, Prince William Yellow Cab, and King Cab which provide transportation services within the same market, in compliance with DMV passenger carrier regulations.

COUNT I - INJUNCTION

32. All preceding paragraphs are incorporated by reference herein.

33. This Court has jurisdiction to enjoin Uber and Lyft pursuant to § 8.01-620 of the Code of Virginia, from operating illegal passenger transportation brokerage services or illegal taxicab services.

34. An injunction would be appropriate because Uber and Lyft are illegally operating as brokers of for-hire passenger transportation services without a valid broker's license issued by the DMV or a permit issued by any local jurisdiction authorizing taxicab service. Their conduct violates numerous Virginia laws, including, without limitation:

(a) Uber and Lyft are currently violating § 46.2-2001.1(A) by operating in the Commonwealth without a broker's license. *Id.* ("It shall be unlawful for any person to operate, offer, advertise, provide, procure, furnish, or arrange by contract, agreement, or arrangement to transport passengers for compensation as a broker, motor carrier or excursion train operator without first obtaining a license, permit, or certificate, unless otherwise exempted, as provided in this chapter.").

(b) Uber and Lyft are currently violating § 46.2-2099.18 by contracting drivers and passengers for passenger transportation services for compensation in Virginia without a broker's license. *Id.* ("No person shall for compensation sell or offer for sale transportation subject to this chapter or shall make any contract, agreement, or arrangement to provide, procure, furnish, or arrange for such transportation or shall hold himself out by advertisement, solicitation, or otherwise as one who sells, provides, procures, contracts, or

arranges for such transportation, unless such person holds a broker's license issued by the Department [DMV] to engage in such transactions”).

- (c) Uber and Lyft are currently violating § 46.2-2011.24(2) by their willful continued operation without a broker’s license, and refusal to comply with the Cease and Desist Order from the DMV. *Id.* (broker’s authority may be denied, suspended or revoked for “Failure to comply subsequent to receipt of a written warning from the Department [DMV] or any willful failure to comply with a lawful order, any provision of this chapter or any regulation promulgated by the Department under this chapter, or any term, condition, or restriction of a license, permit, or certificate”).
- (d) Uber and Lyft are currently violating § 46.2-2011.10(A) by advertising their transportation services in Virginia without obtaining a broker’s license. *Id.* (“No person shall advertise or permit to be advertised by any means a transportation service unless such person first obtains a license, permit, or certificate as provided in this chapter.”)
- (e) Uber and Lyft are currently violating § 46.2-2011.10(B) and § 46.2-2011.24(4-5) by advertising assertions, representations, or statements of fact that are untrue, misleading, or deceptive; including without limitation that their drivers are engaged in lawful ride-sharing services; and in the case of Lyft, that they are lawful “ride-sharing” services for which Lyft asks a “donation.” *Id.* (“It shall be unlawful for any licensee, permittee, or certificate holder to knowingly advertise by any means any assertion, representation, or statement of fact that is untrue, misleading, or deceptive relating to the conduct of the business for which a license, permit, or certificate is held.”). Both Uber and Lyft are unlicensed for-profit brokers of passenger transportation services, and do not comport with a ride-sharing operation as defined by Virginia law. Lyft’s administrative and other charges are not a “donation.”
- (f) Uber and Lyft are currently violating § 46.2-2011.20, which states that “It shall be unlawful for any person to operate or cause to be operated on any highway in the Commonwealth any motor vehicle that (i) does not carry the proper registration and identification that this chapter requires.” Uber and Lyft are in direct violation by soliciting drivers to begin working for profit without the proper registration. Their advertising and recruitment causes these vehicles “to be operated on any highway in the Commonwealth.”
- (g) Uber and Lyft violated § 46.2-2011.9 by failing to obtain and file with the Department, along with a broker application, a surety bond or an irrevocable letter of credit in the amount of \$ 25,000. *Id.* (“Every applicant for an original license pursuant to this chapter shall obtain and file with the Department, along with the application, a surety bond or an irrevocable letter of credit, in addition to any other bond or letter of credit

required by law, in the amount of \$ 25,000. The bond or letter of credit shall be in a form and content acceptable to the Department. The bond or letter of credit shall be conditioned on a statement by the applicant that the applicant will not practice fraud, make any fraudulent representation, or violate any provision of this chapter in the conduct of the applicant's business.”).

- (h) Further, upon information and belief, Uber has not yet paid the DMV's fines, and accordingly is in violation of § 46.2-2011.24(12). *Id.* (broker's authority may be denied, suspended or revoked for “Failure to submit to the Department any tax, fees, dues, fines, or penalties owed to the Department”).
- (i) Uber Technologies, Inc. is a foreign corporation which is transacting business in Virginia without a certificate of authority from the State Corporation Commission. *Id.* § 13.1-757. (“A foreign corporation may not transact business in the Commonwealth until it obtains a certificate of authority from the Commission.”).

This list of statutory violations is not exclusive, and Plaintiffs reserve the right to rely on other and further violations of the law which are discovered in the course of discovery and investigation in this matter.

35. Uber and Lyft's aforementioned illegal broker operations pose an immediate, real and substantial threat to the business of Alexandria White Top, Fairfax White Top, Arlington Blue Top, Love Limousine, VIP Cab Company, Checker Cab, Prince William Yellow Cab, and King Cab, which are taxicab companies authorized by Virginia law and local ordinance. Uber and Lyft are unlawfully competing with Alexandria White Top, Fairfax White Top, Arlington Blue Top, Love Limousine, VIP Cab Company, Checker Cab, Prince William Yellow Cab, and King Cab in the same market and for the same services. Among other things, Uber and Lyft are able to charge lower rates because Uber and Lyft do not require their drivers to pay commercial property taxes, purchase commercial auto insurance, or have local business licenses; and otherwise evade all legal requirements enacted for the protection or benefit of

passengers. By operating “above the law” Uber and Lyft are diverting the lawful business of Alexandria White Top, Fairfax White Top, Arlington Blue Top, Love Limousine, VIP Cab Company, Checker Cab, Prince William Yellow Cab, and King Cab to their illegal operations, and earning substantial profits from their illegal activities.

36. Moreover, Uber and Lyft’s illegal broker operations pose an immediate, real and substantial threat to innocent passengers. Each passenger Uber and Lyft diverts is being exposed to a risk of harm from drivers who do not have lawful commercial licenses or commercial insurance, and are screened only by Uber and Lyft and not by local police departments. Passengers are further forced by Uber and Lyft into giving a waiver from any and all liability, damages, jury trial and other important rights as a condition of Uber and Lyft’s terms of service. They are unwittingly deprived of the benefits and protections of Virginia’s passenger carrier laws by virtue of the fact that Uber and Lyft willfully ignore such laws and disclaim any responsibility.

37. Alexandria White Top, Fairfax White Top, Arlington Blue Top, Love Limousine, VIP Cab Company, Checker Cab, Prince William Yellow Cab, and King Cab lack an adequate remedy at law and would suffer irreparable harm if an injunction does not issue. Mere money damages, alone, would be insufficient to address the harms in this case because Uber and Lyft will continue to operate illegally in the absence of an injunction, and continue to divert more customers.

38. No equitable defenses exist and the public interest would be served by granting an injunction.

COUNT II – DECLARATORY JUDGMENT

39. All preceding paragraphs are incorporated by reference herein.

40. This Court has jurisdiction to enter declaratory judgments pursuant to the

Declaratory Judgment Act, Virginia Code § 8.01-184.

41. Alexandria White Top, Fairfax White Top, Arlington Blue Top, Love Limousine, VIP Cab Company, Checker Cab, Prince William Yellow Cab, and King Cab have an actual controversy and justiciable interest in the subject matter of this litigation; including but not limited to:

a. Uber and Lyft are unlawfully competing with Alexandria White Top, Fairfax White Top, Arlington Blue Top, Love Limousine, VIP Cab Company, Checker Cab, Prince William Yellow Cab, and King Cab in the same market and for the same services.

b. Uber and Lyft are diverting Alexandria White Top, Fairfax White Top, Arlington Blue Top, Love Limousine, VIP Cab Company, Checker Cab, Prince William Yellow Cab, and King Cab's lawful business to their illegal operations, and earning substantial profits for it.

c. Uber and Lyft's illegal broker operations pose an immediate, real and substantial threat to Alexandria White Top, Fairfax White Top, Arlington Blue Top, Love Limousine, VIP Cab Company, Checker Cab, Prince William Yellow Cab, and King Cab's passengers.

d. Alexandria White Top, Fairfax White Top, Arlington Blue Top, Love Limousine, VIP Cab Company, Checker Cab, Prince William Yellow Cab, and King Cab have specific adverse claims to that of Defendants, based upon present facts, which are ripe for judicial adjustment.

e. Defendants denied Plaintiffs' rights and continue to operate by their illegal broker operations.

f. Defendants have willfully refused to follow the DMV Cease and

Desist Orders.

42. Section 8.01-190 of the Code of Virginia allows the Court to award costs in a declaratory judgment action.

43. The Declaratory Judgment Act is remedial and is to be liberally interpreted and administered pursuant to § 8.01-191 of the Code of Virginia.

WHEREFORE, the Plaintiffs, L AND Z TRANSPORTATION, INC., M & R TAXI COMPANY, INC., STAFFORD LIMOUSINE, INC., SONBERZ, INC., NORTHERN VIRGINIA CHECKER CAB, LLC, C&C TRANSPORTATION, INC., and KING CAB COMPANY, INCORPORATED respectfully request:

1. A temporary injunction against Defendants, UBER TECHNOLOGIES, INC., RAISER LLC, DRINNEN, LLC, and LYFT, INC., enjoining them from operating in the Commonwealth of Virginia;

2. A permanent injunction against Defendants, UBER TECHNOLOGIES, INC., RAISER LLC, DRINNEN, LLC, and LYFT, INC., enjoining them from operating in the Commonwealth of Virginia;

3. A declaratory judgment order against Defendants, UBER TECHNOLOGIES, INC., RAISER LLC, DRINNEN, LLC, and LYFT, INC., adjudging that their broker operations in Virginia without a license are unlawful and prohibited;

4. For prejudgment and post-judgment interest; and

5. For any other and further relief the Court deems appropriate.

ALEXANDRIA YELLOW CAB, INC.,
L AND Z TRANSPORTATION, INC.,
M & R TAXI COMPANY, INC.,
STAFFORD LIMOUSINE, INC.,
SONBERZ, INC., and NORTHERN
VIRGINIA CHECKER CAB, LLC

By: _____


Counsel

J. Chapman Petersen, Esq., VSB #37225
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jpetersen@sipfirm.com
nrozsa@sipfirm.com
nbaney@sipfirm.com
Counsel for Plaintiffs

List of Attached Exhibits

- EXHIBIT 1** Certified letter from DMV to Uber, *Re: Assessment of Civil Penalty* (April 14, 2014)
- EXHIBIT 2** Certified letter from DMV to Lyft, *Re: Assessment of Civil Penalty* (April 28, 2014)
- EXHIBIT 3** Certified letter from DMV to Uber, *Re: Cease and desist unauthorized operations in Virginia* (June 5, 2014)
- EXHIBIT 4** Certified letter from DMV to Lyft, *Re: Cease and desist unauthorized operations in Virginia* (June 5, 2014)
- EXHIBIT 5** Uber DC Email, *A Note About Uber in Virginia: You Have the Right to Ride* (Jun 18, 2014)
- EXHIBIT 6** Uber DC Email, *Get FREE rides this summer—no sweat* (Jun 18, 2014)
- EXHIBIT 7** Uber.com; Service Coverage Map for Washington D.C., available at <https://www.uber.com/cities/washington-dc> (last accessed July 15, 2014)
- EXHIBIT 8** Lyft.com; Service Coverage Map for Washington D.C., available at <https://www.lyft.com/help/article/1263245/> (last accessed July 15, 2014)
- EXHIBIT 9** Lyft.com; Service Coverage Map for Virginia beach, available at <https://www.lyft.com/help/article/1513467/> (last accessed July 15, 2014)



COMMONWEALTH of VIRGINIA

Department of Motor Vehicles
2300 West Broad Street

Richard D. Holcomb
Commissioner

Post Office Box 27412
Richmond, VA 23269-0001

ASSESSMENT OF CIVIL PENALTY

April 14, 2014

CERTIFIED MAIL

Travis Kalanick, CEO
Uber Technologies, Inc.
182 Howard Street, Suite 8
San Francisco, CA 94105

Dear Mr. Kalanick:

TAKE NOTICE that Uber Technologies Inc. (Uber) is hereby assessed a civil penalty in the amount of \$26,000 pursuant to *Virginia Code* § 46.2-2011.23(4) for violation of *Virginia Code* § 46.2-2001.1(A).

Virginia Code § 46.2-2011.23 states that, "The Department may impose a civil penalty not exceeding \$1,000 if any person has:

- 4.) Failed to comply with any provision of this chapter or lawful order, rule or regulation of the Department or any term or condition of any certificate, permit, or license."

Virginia Code § 46.2-2011.23 further states that, "For the purposes of this section, each separate violation shall be subject to the civil penalty".

Virginia Code § 46.2001.1(A) states that, "It shall be unlawful for any person to operate, offer, advertise, provide, procure, furnish, or arrange by contract, agreement or arrangement to transport passengers for compensation as a broker, motor carrier or excursion train operator without first obtaining a license, permit, or certificate, unless otherwise exempted, as provided in this chapter."

Virginia Code § 46.2-2000 et seq. defines a "broker" as "any person not included in the term "motor carrier" and not a bona fide employee or agent of any such carrier, who, as principal or agent, sells or offers for sale any transportation subject to this chapter, or negotiates for, or holds himself out by solicitation, advertisement, or otherwise as one who sells, provides, furnishes, contracts, or arranges for such transportation".

EXHIBIT

tabbler

1

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Uber Technologies, Inc.
April 14, 2014

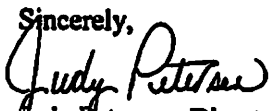
The Department of Motor Vehicles (DMV) Motor Carrier Services has obtained detailed descriptions of 26 (twenty-six) separate trips arranged through the Smartphone application employed by Uber X which indicates that the passenger transportation provided occurred between points within Virginia. The enclosed attachment provides further information regarding these trips.

Despite DMV attempts to educate and warn Uber of the broker's license requirements and to assist Uber with the application requirements, Uber has not made application for, or subsequently been granted, the broker's license referenced in *Virginia Code* § 46.2-2001.1(A) and is therefore subject to a civil penalty pursuant to *Virginia Code* § 46.2-2011.23(4).

In the event Uber makes application for a broker's license it should be noted that continued operations without having been granted a broker's license would be in violation of Virginia law and subject to further penalty. DMV acts upon applications as quickly as possible and in accordance with Virginia law. The relevant sections of *Virginia Code* include § 46.2-2001.3 which addresses public notice requirements, § 46.2-2005 which outlines protest and hearing provisions, and § 46.2-2005.1 and § 46.2-2011 which cover considerations for determination of issuance.

Also note, as previously communicated to representatives of Uber, *Virginia Code* § 46.2-2001.1 indicates that "Beginning July 1, 2014, any person making application for a license, permit, or certificate pursuant to this chapter who has violated § 46.2-2001.1, either as a result of a conviction or as a result of an imposition of a civil penalty, shall be denied such license, permit, or certificate for a period of 12 months from the date the final disposition of the conviction or imposition of the civil penalty has been rendered."

As provided in *Virginia Code* § 46.2-2011.23, Uber may submit a request for an administrative hearing to show cause why the civil penalty should not be assessed. In order for the request to be accepted, it must be in writing and received at DMV no later than May 15, 2014. The written request for a hearing may be; 1. mailed to the address on this letterhead, 2. hand delivered to DMV Headquarters at 2300 West Broad St., Richmond, Virginia, or 3. emailed to david.dunston@dmv.virginia.gov. A timely request for an administrative hearing will stay execution of the civil penalty assessment until the hearing is conducted and a final decision is rendered.

Sincerely,

Judy Petersen, Director
Motor Carrier Services

Enclosure

Attachment:

Date	Driver	Fee	Pickup location	Drop-off location
1/9/2014		\$12.00	3301 Fairfax Dr. Arlington, VA	6100 Arlington Blvd. Arlington, VA
1/9/2014		\$7.00	2800 Clarendon Blvd. Arlington, VA	3610 9 th St. N. Arlington, VA
1/9/2014		\$16.00	6100 Arlington Blvd. Arlington, VA	2801 Clarendon Blvd. Arlington, VA
1/9/2014		\$6.00	2801 Clarendon Blvd. Arlington, VA	3301 Fairfax Drive Arlington, VA
1/9/2014		\$5.00	3301 Fairfax Drive Arlington, VA	2800 Clarendon Blvd. Arlington, VA
1/31/2014		\$6.99	2801 Clarendon Blvd. Arlington, VA	3601 Virginia237 Arlington, VA
1/31/2014		\$6.19	1122 King St. Alexandria, VA	682 N. St. Asaph St. Alexandria, VA
1/31/2014		\$5.96	144 N. Union St. Alexandria, VA	1225 King St. Alexandria, VA
1/31/2014		\$3.80	200 S. West Street Alexandria, VA	135 N. Union St. Alexandria, VA
1/31/2014		\$7.75	105 N. Union St. Alexandria, VA	1217 Prince St. Alexandria, VA
1/31/2014		\$4.99	N. St. Asaph St. Alexandria, VA	107 N. Payne St. Alexandria, VA
2/19/2014		\$13.07	2712 Potomac Mills Cir. Woodbridge, VA	Woodbridge Amtrak Woodbridge, VA
2/19/2014		\$16.34	1040 Express Drive Woodbridge, VA	2700 Potomac Mills Woodbridge, VA

Page Four
Uber Technologies, Inc.
April 14, 2014

Date	Driver	Fee	Pickup location	Drop-off location
3/5/2014		\$6.73	3120 Duke St. Alexandria, VA	501 John Carlyle St. Alexandria, VA
3/6/2014		\$7.23	501 John Carlyle St. Alexandria, VA	3120 Duke St. Alexandria, VA
3/11/2014		\$15.24	601 12 th Street S. Arlington, VA	4600 Fairfax Drive Arlington, VA
3/11/2014		\$4.70	1400 Jefferson Davis Hwy. Arlington, VA	3351 Fairfax Dr. Arlington, VA
3/11/2014		\$17.06	900 South Orme St. Arlington, VA	1100 South Hayes St. Arlington, VA
3/11/2014		\$14.05	1000 North Glebe Rd. Arlington, VA	1600 South Eads St. Arlington, VA
3/13/2014		\$4.70	5808 South Van Dorn St. Franconia, VA	Whistle Way Springfield, VA
3/13/2014		\$9.88	6519 Deepford St. Springfield, VA	5808 S. Van Dorn St. Franconia, VA
3/13/2014		\$11.28	5808 S. Van Dorn St. Franconia, VA	2151 Jamieson Ave. Alexandria, VA
3/13/2014		\$7.09	1609 W. Braddock Rd. Alexandria, VA	1482-1598 N. Howard St. Alexandria, VA
3/13/2014		\$11.20	2001 N. Beauregard St. Alexandria, VA	5801 Duke St. Alexandria, VA
3/14/2014		\$8.32	3140 Duke St. Alexandria, VA	1482 N. Howard St. Alexandria, VA
3/14/2014		\$10.18	1482 N. Howard St. Alexandria, VA	3127 Duke St. Alexandria, VA



COMMONWEALTH of VIRGINIA

Department of Motor Vehicles
2300 West Broad Street

Richard D. Holcomb
Commissioner

Post Office Box 27412
Richmond, VA 23269-0001

ASSESSMENT OF CIVIL PENALTY

April 28, 2014

CERTIFIED MAIL AND EMAIL

Joseph Okpaku, Manager, Public Relations
lyft, Inc.
548 Market Street, #68514
San Francisco, CA 94104

Dear Mr. Okpaku:

TAKE NOTICE that lyft, Inc. (lyft) is hereby assessed a civil penalty in the amount of \$9,000 pursuant to *Virginia Code* § 46.2-2011.23(4) for violations of *Virginia Code* §§ 46.2-2001.1(A) and 46.2-2011.10(A).

Virginia Code § 46.2-2011.23 states that, "The Department may impose a civil penalty not exceeding \$1,000 if any person has...[f]ailed to comply with any provision of [Title 46.2, Chapter 20] or lawful order, rule or regulation of the Department or any term or condition of any certificate, permit, or license." *Virginia Code* § 46.2-2011.23 further states that, "For the purposes of this section, each separate violation shall be subject to the civil penalty."

Virginia Code § 46.2-2001.1(A) states that, "It shall be unlawful for any person to operate, offer, advertise, provide, procure, furnish, or arrange by contract, agreement, or arrangement to transport passengers for compensation as a broker, motor carrier or excursion train operator without first obtaining a license, permit, or certificate, unless otherwise exempted, as provided in this chapter."

Virginia Code § 46.2-2011.10(A) states in part that, "No person shall advertise or permit to be advertised by any means a transportation service unless such person first obtains a license, permit, or certificate as provided in this chapter."

Virginia Code § 46.2-2000 defines a "broker" as "any person not included in the term 'motor carrier' and not a bona fide employee or agent of any such carrier, who, as principal or agent, sells or offers for sale any transportation subject to this chapter, or negotiates for, or holds himself out by solicitation, advertisement, or otherwise as one who sells, provides, furnishes, contracts, or arranges for such transportation."



Page Two
Lyft, Inc.
April 28, 2014

The Department of Motor Vehicles (DMV) Motor Carrier Services has obtained detailed descriptions of 8 (eight) separate trips arranged through the Smartphone application employed by Lyft in which the passenger transportation provided occurred between points within Virginia. The enclosed attachment provides further information regarding these trips.

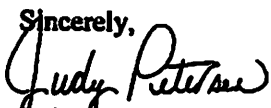
Despite DMV attempts to educate and warn Lyft of the broker's license requirements, Lyft has not made application for, or subsequently been granted, the broker's license referenced in *Virginia Code* § 46.2-2001.1(A) and is therefore subject to a civil penalty pursuant to *Virginia Code* § 46.2-2011.23(4).

On its website, www.lyft.com, Lyft advertises that its services are offered in Virginia Beach – Hampton Roads, Virginia – and provides a pricing schedule. On April 25, 2014, Lyft held a launch party at the Public House Pub located in Norfolk, Virginia to kick off its transportation service. Coupons for free rides valued up to \$25 were distributed. Such action constitutes a violation of *Virginia Code* § 46.2-2011.10(A) and presents grounds for a civil penalty pursuant to *Virginia Code* § 46.2-2011.23.

In the event Lyft makes application for a broker's license it should be noted that continued operations without having been granted a broker's license would be in violation of Virginia law and subject to further penalty. DMV acts upon applications as quickly as possible and in accordance with Virginia law, including *Virginia Code* §§ 46.2-2001.3, 46.2-2005, 46.2-2005.1, and 46.2-2011 (providing for public notice of applications received, protest and hearing procedures, and further considerations for determination of issuance).

Also note, as previously communicated to Lyft, *Virginia Code* § 46.2-2001.1 indicates that “[b]eginning July 1, 2014, any person making application for a license, permit, or certificate pursuant to this chapter who has violated § 46.2-2001.1, either as a result of a conviction or as a result of an imposition of a civil penalty, shall be denied such license, permit, or certificate for a period of 12 months from the date the final disposition of the conviction or imposition of the civil penalty has been rendered.”

As provided in *Virginia Code* § 46.2-2011.23, Lyft may submit a request for an administrative hearing to show cause why the civil penalty should not be assessed. In order for the request to be accepted, it must be in writing and received at DMV no later than May 29, 2014. The written request for a hearing may be mailed to the address on this letterhead, hand delivered to DMV Headquarters at 2300 West Broad St., Richmond, Virginia, or emailed to david.dunston@dmv.virginia.gov. A timely request for an administrative hearing will stay execution of the civil penalty assessment until the hearing is conducted and a final decision is rendered.

Sincerely,

Judy Petersen, Director
Motor Carrier Services

Enclosure

Page Three
Lyft, Inc.
April 28, 2014

Attachment:

Date	Driver	Fee	Pickup location	Drop-off location
1/13/2014		5.00	900 N. Monroe St. Arlington, VA	1132 N. Edgewood St. Arlington, VA
1/13/2014		6.00	N. Nelson St. & Fairfax Dr. Arlington, VA	2732 Washington Blvd. Arlington, VA
3/11/2014		20.00	1640-1694 S. Hayes St. Arlington, VA	2100-2198 15 th St. N. Arlington, VA
3/11/2014		9.00	4601 Fairfax Drive Arlington, VA	1715 N. George Mason Dr Arlington, VA
3/11/2014		8.00	3351 Fairfax Drive Arlington, VA	832-900 South Orme St. Arlington, VA
3/11/2014		13.00	1100 South Hayes Street Arlington, VA	1000 North Glebe Road Arlington, VA
3/13/2014		11.00	207 South Peyton Street Alexandria, VA	501-515 King Street Alexandria, VA
3/13/2014		17.00	5801 Duke Street Alexandria, VA	1904 Diagonal Road Alexandria, VA



COMMONWEALTH of VIRGINIA

Department of Motor Vehicles
2300 West Broad Street

Post Office Box 27412
Richmond, VA 23269-0001

Richard D. Holcomb
Commissioner

June 5, 2014

CERTIFIED MAIL

Travis Kalanick, CEO
Uber Technologies, Inc.
182 Howard Street, Suite 8
San Francisco, CA 94105

Re: Cease and desist unauthorized operations in Virginia

Dear Mr. Kalanick:

For over six months, the Virginia Department of Motor Vehicles (DMV) has alerted Uber Technologies, Inc. (Uber) of its requirement to obtain authority before operating in Virginia. DMV has educated Uber about Virginia's passenger carrier laws, which apply to any business that receives compensation to provide or facilitate transportation. More recently, DMV assessed a civil penalty to Uber after collecting evidence of specific instances of compensated transportation services. I am once again making clear that Uber must cease and desist operating in Virginia until it obtains proper authority. Further, DMV will issue civil penalties to Uber's drivers that do not have authority to provide transportation for compensation.

Virginia law requires for-hire passenger carriers to have proper operating authority. Although certain types of passenger carrier arrangements are excluded from this requirement, none of those exclusions applies to Uber's operations. For example, *Va. Code* § 46.2-2000.1 contains an exclusion for ride-sharing arrangements; however, a separate statute sets out the requirements for ride-sharing arrangements. This statute defines ride-sharing arrangements as those which do not involve transporting passengers for profit. See *Va. Code* § 46.2-1400, *et seq.* Uber's operations are not ridesharing arrangements as defined in Virginia law because Uber receives compensation for its services.

As you know, DMV is actively studying Virginia's passenger carrier laws and business models such as Uber. DMV has invited Uber and other stakeholders to participate in this study and will produce a final report before the next legislative session. I strongly suggest that Uber focus its resources on participation in this study rather than continue illegal operations in the meantime.

Finally, please alert your drivers in Virginia that DMV will enforce existing laws prohibiting illegal operations by companies such as Uber and by individual drivers that lack authority to provide passenger transportation.

Sincerely,

Richard D. Holcomb





COMMONWEALTH of VIRGINIA

Department of Motor Vehicles
2300 West Broad Street

Post Office Box 27412
Richmond, VA 23269-0001

Richard D. Holcomb
Commissioner

June 5, 2014

CERTIFIED MAIL AND EMAIL

Joseph Okpaku, Manager, Public Relations
Lyft, Inc.
548 Market Street, #68514
San Francisco, California 94104

Re: Cease and desist unauthorized operations in Virginia

Dear Mr. Okpaku:

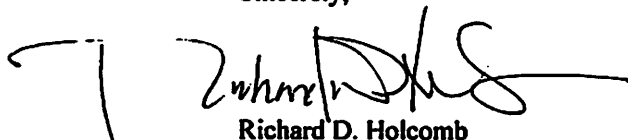
For over four months, the Virginia Department of Motor Vehicles (DMV) has alerted Lyft, Inc. (Lyft) of its requirement to obtain authority before operating in Virginia. DMV has educated Lyft about Virginia's passenger carrier laws, which apply to any business that receives compensation to provide or facilitate transportation. More recently, DMV assessed a civil penalty to Lyft after collecting evidence of specific instances of compensated transportation services. I am once again making clear that Lyft must cease and desist operating in Virginia until it obtains proper authority. Further, DMV will issue civil penalties to Lyft's drivers that do not have authority to provide transportation for compensation.

Virginia law requires for-hire passenger carriers to have proper operating authority. Although certain types of passenger carrier arrangements are excluded from this requirement, none of those exclusions applies to Lyft's operations. For example, *Va. Code* § 46.2-2000.1 contains an exclusion for ride-sharing arrangements; however, a separate statute sets out the requirements for ride-sharing arrangements. This statute defines ride-sharing arrangements as those which do not involve transporting passengers for profit. See *Va. Code* § 46.2-1400, *et seq.* Lyft's operations are not ridesharing arrangements as defined in Virginia law because Lyft receives compensation for its services.

As you know, DMV is actively studying Virginia's passenger carrier laws and business models such as Lyft. DMV has invited Lyft and other stakeholders to participate in this study and will produce a final report before the next legislative session. I strongly suggest that Lyft focus its resources on participation in this study rather than continue illegal operations in the meantime.

Finally, please alert your drivers in Virginia that DMV will enforce existing laws prohibiting illegal operations by companies such as Lyft and by individual drivers that lack authority to provide passenger transportation.

Sincerely,



Richard D. Holcomb





A Note About Uber in Virginia: You Have the Right to Ride

4 messages

Uber Virginia <supportdc@uber.com>
Reply-To: Uber Virginia <supportdc@uber.com>

Fri, Jun 6, 2014 at 12:47 PM

U B E R

Our Commitment to Virginia

Hey John,

You may have heard that Uber received a cease and desist letter from the Virginia DMV yesterday. We wanted to write to let you know that Uber will operate as usual, and we plan to continue full-speed ahead with our commitment to providing Virginians access to safe, affordable and reliable rides. We are surprised and disappointed by the DMV's actions, given that Uber has been working with the Virginia government for months to modernize regulations that will put consumer safety first. Virginia should be standing for innovation, consumer choice and job growth.

Uber has set the standard for consumer safety in the Commonwealth. All uberX rides in Virginia are insured up to \$1,000,000, nearly 300% more than the \$350,000 required of for-hire drivers by the Virginia DMV. While the Virginia DMV does not require that all for-hire drivers pass background checks, all drivers on the Uber platform pass rigorous background checks at the county, state and federal level before they are ever allowed access to the technology. Our commitment to safety far exceeds the requirements set by the Virginia DMV - making their actions puzzling.

If you want continued access to the safest and most affordable rides on the road, we need you to email, call and tweet your policymakers and tell them #VANeedsUber. Let Virginia policymakers know that banning ridesharing not only harms the countless riders who use the platform to connect with safe, affordable and reliable rides, but it also hurts thousands of small business entrepreneurs who rely on the platform to make a living, create new jobs and contribute to the economy.



Uber on,

Zuhairah Washington
General Manager, Uber DC

Rachel Holt
Regional General Manager, East Coast

**TELL THE VIRGINIA DMV AND THE COMMONWEALTH GOVERNMENT
TO STAND UP FOR YOU!**

The answer depends on you: Tell Virginia's leaders that #VAneedsUber and ask them to stand up for you and not the status quo.

Reach out to Virginia DMV Commissioner Richard Holcomb, richard.holcomb@dmv.virginia.gov or 804-367-6606.



Tell Commissioner Holcomb that Virginia needs better transportation options.

Reach out to Virginia Governor Terry McAuliffe, terence.mcauliffe@governor.virginia.gov or 703-822-7604.



Tell Governor McAuliffe to stand with residents, and support innovation and job creation.

Reach out to Virginia Attorney General Mark Herring mailoag@oag.state.va.us or 804-786-2071.



Tell Attorney General Herring to uphold Virginians' right to safer and more affordable transportation.

Reach out to the Department of Transportation Secretary Aubrey Layne aubrey.layne@governor.virginia.gov or 804-786-2071.



[Unsubscribe](#) | [Email Preferences](#) | [View this email online](#)

Uber Technologies, Inc. • 182 Howard Street, #8, San Francisco, CA 94105

Fri, Jun 6, 2014 at 2:37 PM

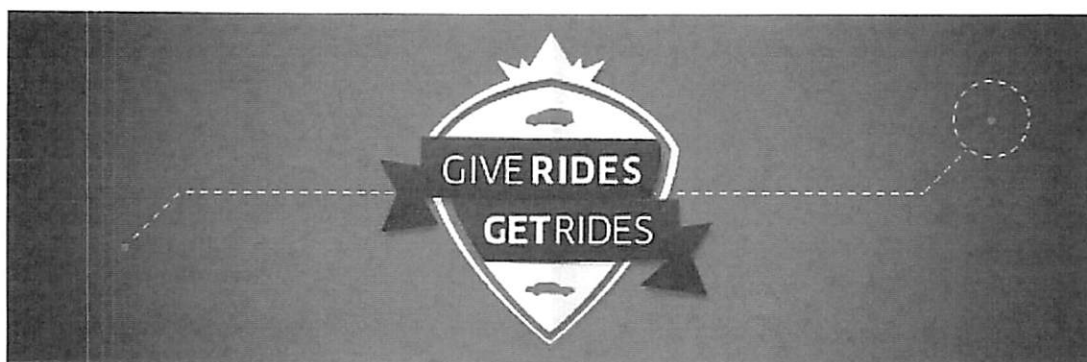


Get FREE rides this summer—no sweat

2 messages

Uber DC <supportDC@uber.com>
Reply-To: Uber DC <supportDC@uber.com>

Wed, Jun 18, 2014 at 1:51 PM



Hey John,

This June, we're giving all-star riders like you the chance to **earn as many free rides as you want**, just for inviting friends to try Uber! Get your whole gang on board, and you'll be cruising into summer, free of charge.

SHARE FREE RIDES. GET FREE RIDES.

POST IT
 TWEET IT
 EMAIL IT

YOUR REFERRAL CODE TO SHARE: db0pi

HOW IT WORKS

1. Tell friends to sign up for Uber using your referral code.
2. For every friend who signs up and rides, you each get 1 free ride.
3. Track your rides in your account—and earn as many as you want!

Like long days and warm nights, this special offer won't last forever. Collect your free rides while it's hot!



Ride on,
Team Uber DC

Want more info? Learn more about Uber in DC here.

THE 411 ON FREE RIDES

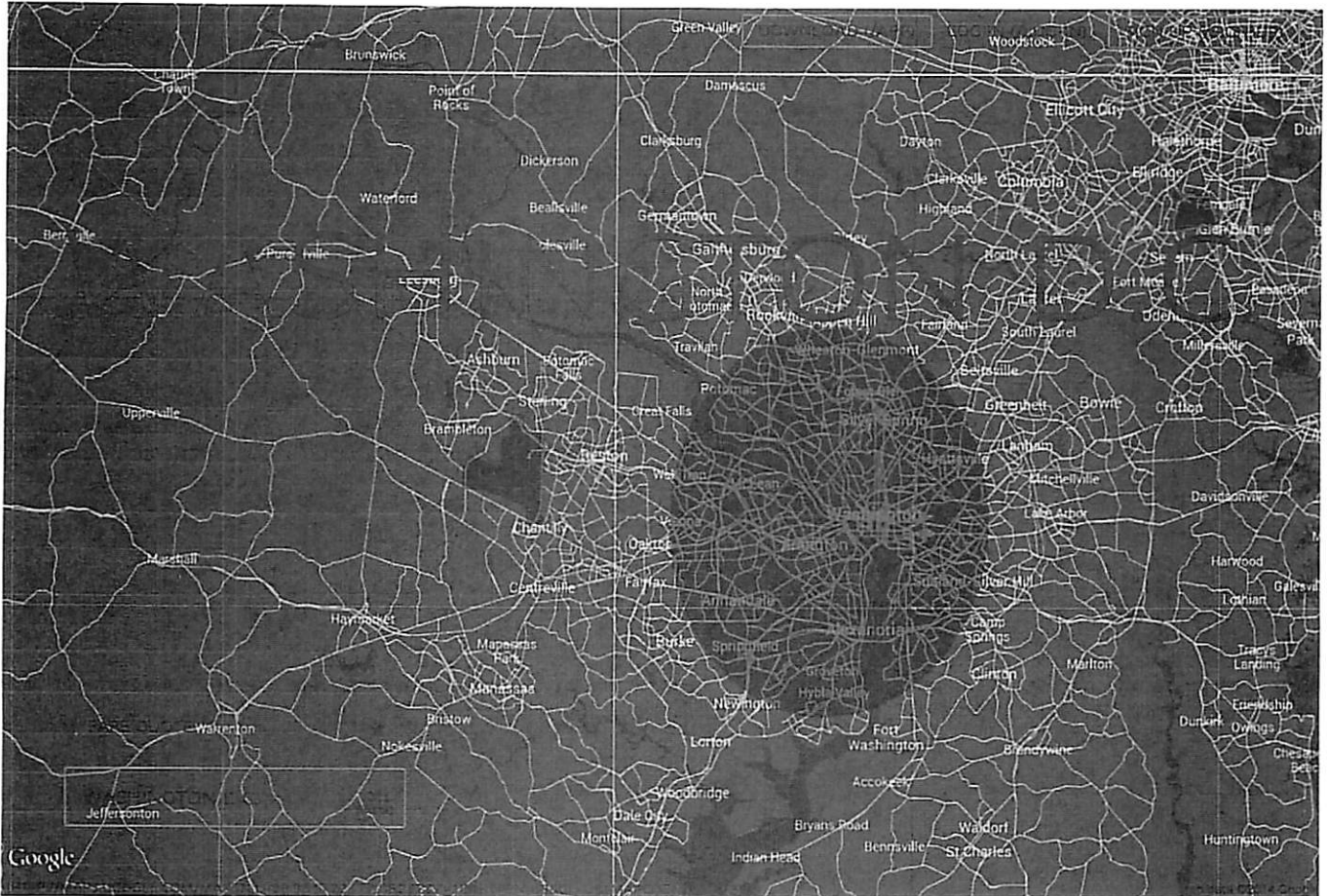
- Valid up to \$30.
- Work anywhere in the USA.
- Good on all ride options, except uberTAXI.
- New users must sign up within Uber DC's reliable coverage area.



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Uber Technologies, Inc. • 182 Howard Street, #8, San Francisco, CA 94105

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AVAILABLE CHOICES



uberX
THE LOW-COST UBER



AVAILABLE CHOICES

UBERX ^v^

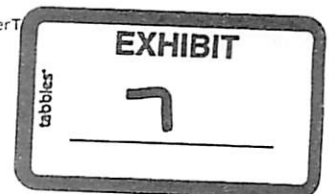
uberX

uberXL

UberBLACK

UberSUV

UberT



MENU BASE FARE \$3.10 + \$0.29 PER MINUTE + \$1.40 PER MILE

DOWNLOAD (/APP) LOG IN / LOG OUT SIGN UP (/SIGN-UP) SAFE RIDES FEE MIN FARE \$5.70 CANCELLATION FEE \$5

uberX

SEATS UP TO 4 | SAMPLE VEHICLES: TOYOTA CAMRY HONDA ACCORD NISSAN ALTIMA

THE LOW-COST UBER

\$3.10 Base fare +

\$0.29 per minute

HELP CENTER +

\$5.70 Min fare | \$

WE'RE
HERE TO
HELP

VISIT THE HELP CENTER
([HTTP://SUPPORT.UBER.COM](http://support.uber.com))



WORK FOR UBER (/JOBS/LIST)

\$1.40 Per mile

TWEETS

fee | Seats up to 4

Think you've got what it takes to earn credits, cash, & experience as a Brand Ambassador for @UBER_DC ([HTTP://TWITTER.COM/UBER_DC](http://twitter.com/uber_dc))?

Apply here:

[HTTP://T.CO/9WJJYMFZYR](http://t.co/9WJJYMFZYR)

[FOLLOW @UBER_DC](http://t.co/9WJJYMFZYR)

([HTTP://WWW.TWITTER.COM/UBER_DC](http://www.twitter.com/uber_dc))

uberXL

LOW-COST RIDES FOR LARGE GROUPS

\$4 Base fare +

\$0.35 per minute

+

FLAT RATES

\$2.50 Per mile

\$7 Min fare | \$1 Safe Rides Fee | \$5 Cancellation fee | Seats up to 6

UBERBLACK v v

WASHINGTON DC - INSIDE THE BELTWAY
DULLES INTERNATIONAL AIRPORT

\$65 uberX

\$75 uberXL

\$80 UberBLACK

\$105 UberSUV

UberBLACK

WASHINGTON DC - INSIDE THE BELTWAY
BALTIMORE WASHINGTON INTERNATIONAL AIRPORT

\$85 uberX

\$95 uberXL

\$115 UberBLACK

\$145 UberSUV

WASHINGTON DC - INSIDE THE BELTWAY
DOWNTOWN BALTIMORE

\$105 uberX

\$120 uberXL

\$140 UberBLACK

\$180 UberSUV

Black Car

THE ORIGINAL UBER

DULLES INTERNATIONAL AIRPORT
DOWNTOWN BALTIMORE

\$7 Base fare +

\$0.35 per minute

+

\$3 Per mile

\$180 UberBLACK

\$230 UberSUV

\$12 Min fare | \$10 Cancellation fee | Seats up to 4

UBERSUV v v

THE FINE PRINT

MENU

*Uber is not a transportation provider. No need to tip. Flat rates apply to direct trips between specified locations. Additional stops may result in a higher fare. Applicable toll and surcharges may be added to your fare. At times of intense demand, our rates change over time to keep vehicles available.

DOWNLOAD (/APP)

LOG IN (/LOG-IN)

SIGN UP (/SIGN-UP)

Uber TAXI

\$14 Base fare +

\$0.45 per minute

\$3.65 Per mile

DOWNLOAD UBER (/APP)

+

\$25 Min fare | \$10 Cancellation fee | Seats up to 6

SIGN UP FOR UBER (/SIGN-UP)

UBERTAXI v ^

- f ↓ (https://www.facebook.com/uber)
- ↓ (https://twitter.com/uber)
- ↓ (http://www.linkedin.com/company/1815218)
- 8 ↓ (https://plus.google.com/112684473482252498171)

- HOME (/)
- CITIES (/CITIES)
- DRIVERS (/DRIVERS)
- ABOUT US (/ABOUT)
- HELP CENTER (HTTP://SUPPORT.UBER.COM)
- CAREERS (/JOBS)
- BLOG (HTTP://BLOG.UBER.COM)

uber TAXI

TAXI

TAXI WITHOUT THE HASSLE

Use Uber to request and pay for a taxi, at standard taxi meter rates plus a \$2 booking fee. A 20% gratuity is automatically added for the driver by default.

\$0 Min fare | \$5 Cancellation fee | Seats up to 4



HOW IT WORKS (/HOW/) SAFETY (/SAFETY/) DRIVE (/DRIVERS/) STORIES (/STORIES/)

Back to Support (/help/)

DOWNLOAD ()

D.C.

PRICING

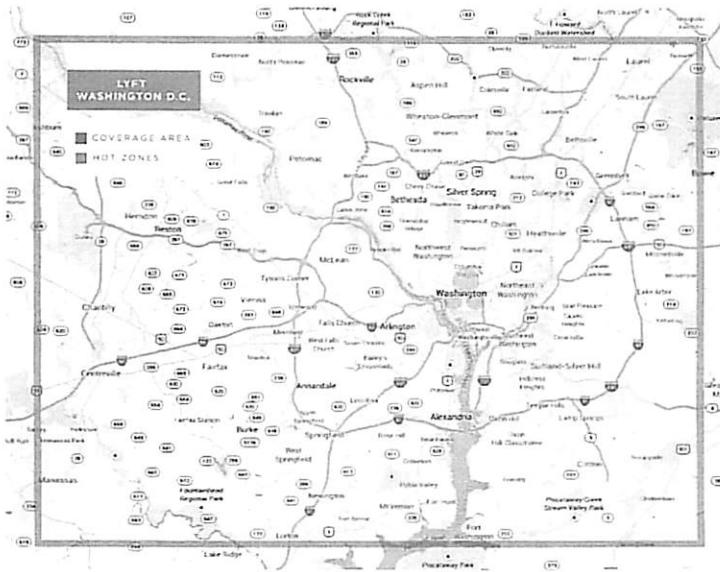
Trust & Safety Fee	\$1.00
Cancel Penalty	\$5.00
Cost Minimum	\$5.00
Cost Per Mile	\$1.26
Cost Per Minute	\$0.26
Pickup Charge	\$2.03

HOURS

Lyft is available 24 hours a day, 7 days a week.

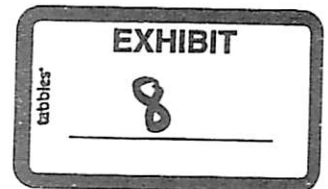
MAP

This coverage map shows where Lyft passengers can request rides. Hot Zones are our busiest neighborhoods.



(https://s3.amazonaws.com/lyft-assets/help.lyft.com/maps/maps_dca.png)

SEE RELATED ARTICLES (/HELP/TOPIC/CITIES)



FOR DRIVERS

Looking for Driver FAQ? Browse driver specific questions in our Driver Help Center.

[DRIVER HELP \(/DRIVE/HELP\)](#)

CAN'T FIND WHAT YOU'RE LOOKING FOR?

[CONTACT US \(/HELP/CONTACT\)](#)

DISCOVER

[HOW IT WORKS \(/HOW/\)](#)

[SAFETY \(/SAFETY/\)](#)

[STORIES \(/STORIES/\)](#)

[DRIVE \(/DRIVERS/\)](#)

[CITIES \(/CITIES/\)](#)

[HELP \(/HELP/\)](#)

ABOUT US

[PRESS \(/PRESS/\)](#)

[JOBS \(/JOBS/\)](#)

[BLOG \(HTTP://BLOG.LYFT.COM\)](http://blog.lyft.com)

[LYFT FOR GOOD](#)

[\(HTTP://BLOG.LYFT.COM/LYFTFORGOOD\)](http://blog.lyft.com/lyftforgood)

DRIVERS

[SIGN UP \(/DRIVERS/\)](#)

[LOG IN \(/LOGIN/\)](#)

 [\(HTTPS://TWITTER.COM/LYFT\)](https://twitter.com/lyft)  [\(HTTPS://WWW.FACEBOOK.COM/LYFT\)](https://www.facebook.com/lyft) 
 [\(HTTP://INSTAGRAM.COM/LYFT\)](http://instagram.com/lyft) [DOWNLOAD](#)

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HOW IT WORKS (/HOW/) SAFETY (/SAFETY/) DRIVE (/DRIVERS/) STORIES (/STORIES/)

Back to Support (/help/)

VIRGINIA BEACH DOWNLOAD ()

PRICING

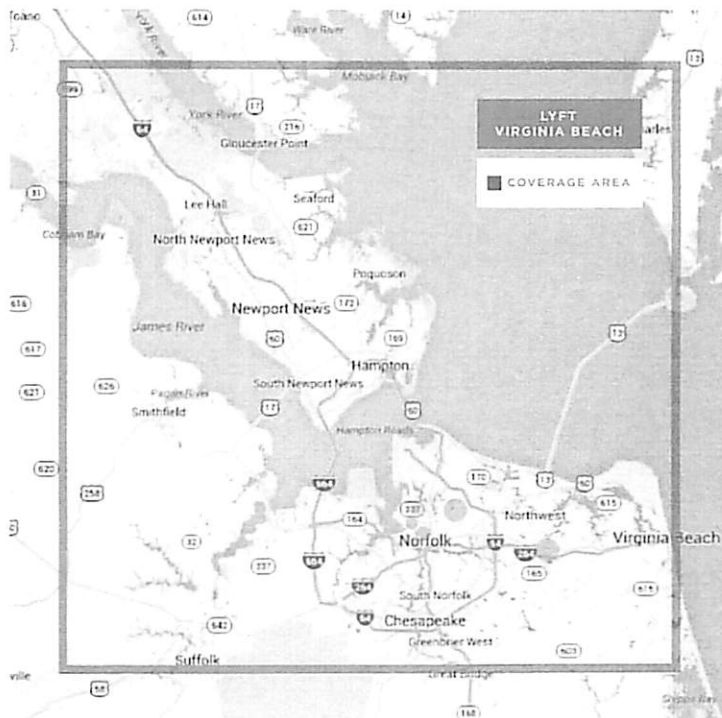
Trust & Safety Fee	\$1.00
Cancel Penalty	\$5.00
Cost Minimum	\$5.00
Cost Per Mile	\$1.45
Cost Per Minute	\$0.20
Pickup Charge	\$1.35

HOURS

Lyft is available 24 hours a day, 7 days a week.

MAP

This coverage map shows where Lyft passengers can request rides. Hot Zones are our busiest neighborhoods.



(https://s3.amazonaws.com/lyft-assets/help.lyft.com/maps/maps_orf.png)



SEE RELATED ARTICLES (/HELP/TOPIC/CITIES)

FOR DRIVERS

Looking for Driver FAQ? Browse driver specific questions in our Driver Help Center.

DRIVER HELP (/DRIVE/HELP)

CAN'T FIND WHAT YOU'RE LOOKING FOR?

CONTACT US (/HELP/CONTACT)

DISCOVER

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