

COMMONWEALTH COURT OF PENNSYLVANIA

Rockland Collision Center, Inc. v. Commonwealth of Pennsylvania,
Department of Transportation, Bureau of Motor Vehicles

Rockland Collision Center · No. 608 C.D. 2024 · Decided December 19, 2025

SUMMARY

The Commonwealth Court of Pennsylvania reversed an order reinstating PennDOT’s suspension of Rockland Collision Center’s certificate as an official safety inspection station. The court held that PennDOT’s notice violated due process because it cited penalty provisions but did not identify the substantive statutory or regulatory provisions allegedly violated. The court also concluded that substantial evidence did not support certain alleged violations and that deficient or incomplete recordkeeping, without proof of intentional deception, did not constitute fraudulent recordkeeping.

CASE DETAILS

COURT	Commonwealth Court of Pennsylvania
WRITING FOR THE COURT	Stacy Wallace; Patricia A. McCullough; Mary Hannah Leavitt
JURISDICTION	Commonwealth Court of Pennsylvania
DECIDED	December 19, 2025
DOCKET	608 C.D. 2024
DISPOSITION	reversed
PROCEDURAL POSTURE	Rockland Collision Center appealed the Court of Common Pleas of Philadelphia County order denying its appeal and reinstating PennDOT’s suspension of its certificate of appointment as an official safety inspection station.
STANDARD OF REVIEW	The Court reviewed whether substantial evidence supported the trial court’s factual findings and whether the trial court committed an error of law. Legal conclusions were reviewed de novo under a plenary scope of review.
PRECEDENTIAL VALUE	Published and precedential
PARTIES	Rockland Collision Center, Inc. v. Commonwealth of Pennsylvania, Department of Transportation, Bureau of Motor Vehicles

TOPICS

judicial review of agency action

procedural due process

administrative law

standard of review

appellate procedure

PRACTICE AREAS

administrative law

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appellate procedure

QUESTIONS PRESENTED

1. Whether PennDOT violated procedural due process by failing to identify the substantive statutory or regulatory provisions allegedly violated in its suspension notice.
2. Whether substantial evidence supported findings that Rockland Collision Center furnished or received inspection certificates without performing inspections and failed to provide written receipts or work orders on May 12, 2022.
3. Whether omissions and incomplete entries in Rockland Collision Center's MV-431 records constituted fraudulent recordkeeping.

HOLDINGS

1. PennDOT violated Rockland Collision Center's due process rights because the suspension notice cited only the authority and penalty provisions, rather than the substantive statutory or regulatory provisions allegedly violated.
2. The trial court's findings that Rockland furnished or received inspection certificates without performing inspections and failed to provide written receipts or work orders on May 12, 2022 were not supported by substantial evidence.
3. Rockland's inadequate and incomplete MV-431 records did not establish fraudulent recordkeeping because PennDOT did not prove that any recorded information was false or that the records were made with the purpose of misleading an inspector.

KEY QUOTATIONS

“Generally, due process demands that “[t]he government cannot revoke a benefit or privilege it has granted unless it affords the affected person notice and an opportunity to be heard.”” (at 9)

“This Court has explained that fraudulent recordkeeping “occurs when an entry in the record, the MV-431, is false, entered intentionally and with the purpose of deceiving.”” (at 13)

“The trial court erred as a matter of law in equating Inspection Station’s omissions with fraud and by concluding Inspection Station engaged in fraudulent recordkeeping.” (at 14)

FACTUAL BACKGROUND

PennDOT audited Rockland Collision Center on May 12, 2022 and found hundreds of missing or incomplete MV-431 inspection records, missing required tools, and records lacking brake and tire measurements and other required information. PennDOT removed unused inspection stickers and advised the station to cease safety

inspections. The inspection station presented no evidence at the trial court hearing. The trial court reinstated PennDOT's suspension after reconsideration, finding violations including improper or fraudulent recordkeeping.

PROCEDURAL HISTORY

PennDOT suspended Rockland Collision Center's inspection certificate after a May 12, 2022 audit. The trial court initially sustained Rockland's appeal, but on PennDOT's motion for reconsideration it vacated that order, denied the appeal, and reinstated the suspension. Rockland timely appealed to the Commonwealth Court of Pennsylvania, which reversed.

DISPOSITION

reversed

CASES CITED

- McCarthy v. Department of Transportation, 7 A.3d 346, 350 (Pa. Cmwlth. 2010)
- Snyder v. Department of Transportation, Bureau of Motor Vehicles, 970 A.2d 523, 528 (Pa. Cmwlth. 2009)
- Department of Transportation, Bureau of Traffic Safety v. O'Connell, 555 A.2d 873, 875 (Pa. Cmwlth. 1989)
- Gorsline v. Board of Supervisors of Fairfield Township, 186 A.3d 375, 385 (Pa. 2018)
- Allegheny County Department of Health v. Wilkerson, 329 A.3d 111, 117 (Pa. Cmwlth. 2024)
- Firestone Tire & Service Center, O.I.S. No. 798 v. Department of Transportation, 871 A.2d 863, 867 (Pa. Cmwlth. 2005)
- Ganoë v. Department of Transportation, Bureau of Driver Licensing, 247 A.3d 91, 95 (Pa. Cmwlth. 2021)
- Goldberg v. Kelly, 397 U.S. 254, 267-68 (1970)
- Manna v. Department of Transportation, Bureau of Motor Vehicles (Pa. Cmwlth., Nos. 785, 786 C.D. 2022, filed Oct. 22, 2024)
- Germantown Cab Co. v. Philadelphia Parking Authority, 27 A.3d 280, 284 (Pa. Cmwlth. 2011)
- Commonwealth v. Borriello, 696 A.2d 1215, 1217 (Pa. Cmwlth. 1997)

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