

CAPTION SHEET

CASE MANAGEMENT SYSTEM

- 1. REPORT DATE: 00/00/00
- 2. BUREAU: TAS
- 3. SECTION(S):
- 5. APPROVED BY: DIRECTOR: SUPERVISOR:
- 6. PERSON IN CHARGE: BEARD
- 8. DOCKET NO: A-00112192C0501
- 4. PUBLIC MEETING DATE: 00/00/00
- 7. DATE FILED: 05/24/05
- 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: TRANSPORTATION & SAFETY, BUREAU OF

RESPONDENT/APPLICANT: ADAM'S MOVING & HAULING, INC.

COMP/APP COUNTY: UTILITY CODE: 701377

ALLEGATION OR SUBJECT

COMPLAINT AGAINST ADAMS MOVING & HAULING INC FOR VARIOUS VIOLATIONS.

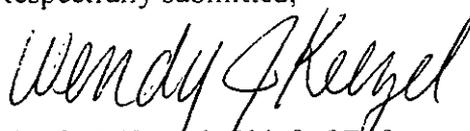
DOCKETED

MAY 25 2005

DOCUMENT
FOLDER

WHEREFORE, the Bureau of Transportation and Safety Prosecutory Staff hereby requests that the Commission fine Adam's Moving & Hauling, Inc., the sum of two hundred fifty dollars (\$250.00) for the illegal activity described in this complaint and order such other remedy as the Commission may deem to be appropriate.

Respectfully submitted,

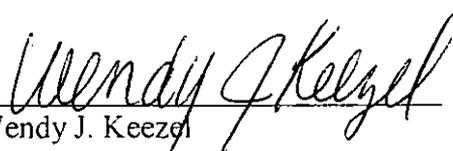


Wendy J. Keezel, Chief of Enforcement
Motor Carrier Services & Enforcement Division
Bureau of Transportation and Safety
P.O. Box 3265
Harrisburg, PA 17105-3265

VERIFICATION

I, Wendy J. Keezel, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date: 5-23-05


Wendy J. Keezel

NOTICE

A. You must file an answer within twenty (20) days of the date of service of this complaint. The date of service is the mailing date as indicated at the top of the Secretarial cover letter for this complaint and notice, 52 Pa. Code §1.56(a). An answer is a written explanation of circumstances wished to be considered in determining the out come. The answer shall raise all factual and legal arguments that you wish to claim in your defense and must include the reference number of this complaint. Your answer must be verified and the original and three (3) copies sent to:

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

B. If you fail to answer this complaint within twenty (20) days, the Bureau of Transportation and Safety will request that the Commission issue a Secretarial Letter imposing a penalty.

C. You may elect not to contest this complaint by paying the fine proposed in this complaint by certified check or money order. Payment must be made to the **Commonwealth of Pennsylvania** and should be forwarded to:

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Your payment is an admission that you committed the alleged violation and an agreement to cease and desist from further violations. Upon receipt of your payment, the complaint proceeding shall be closed.

D. If you file an answer which either admits or fails to deny the allegations of the complaint, the Bureau of Transportation and Safety will request that the Commission issue a *Secretarial Letter imposing a penalty*.

E. If you file an answer which contests the complaint, the matter will be assigned to an administrative law judge for hearing and decision. The judge is not bound by the optional fine set forth above.

F. Alternative formats of this material are available, for persons with disabilities, by contacting the Compliance Office at (717) 787-1168.

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG PA 17105-3265

Date of Service: MAY 25, 2005
Docket Number: A-00112192C0501

DOCKETED
MAY 25 2005

ADAM'S MOVING & HAULING INC
915 MADISON AVENUE
NORRISTOWN PA 19402

Pennsylvania Public Utility Commission Bureau of Transportation and Safety
v.
ADAM'S MOVING & HAULING INC

Dear Sir/Madam:

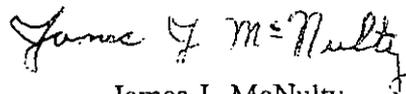
The Pennsylvania Public Utility Commission has delegated its authority to initiate prosecutory proceedings to several bureaus in the Commission with enforcement responsibilities.

Pursuant to this delegated authority and Section 701 of the Public Utility Code, the Bureau of Transportation and Safety Prosecutory Staff has filed the attached complaint against you.

Please refer to the Notice page at the conclusion of this complaint for detailed instructions on how to proceed. Alternative formats of this material are available for persons with disabilities.

Any questions may be directed to the Technical Review Section of the Bureau of Transportation and Safety at (717) 787-1168.

Very truly yours,


James J. McNulty
Secretary

**DOCUMENT
FOLDER**

ddi

PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIPT

The addressee named here has paid the PA P.U.C. for the following bill:

DATE: 6/8/2005
RECEIPT NO: 183357

ADAM'S MOVING & HAULING, INC.
915 MADISON AVENUE
NORRISTOWN PA 19403

**DOCUMENT
FOLDER**

PUC VS. ADAM'S MOVING & HAULING, INC.

Fine for the violation of Pa Public Utility Law

Docket Number A-00112192C0501..... \$250.00

REVENUE ACCOUNT: 001420-017000-101

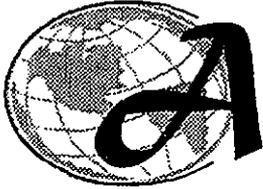
CHECK NUMBER: 10016
CHECK AMOUNT: \$250.00

Stephen Reed
(for Department of Revenue)

DOCKETED

JUN 13 2005

RJP



ADAM'S MOVING & HAULING, INC.

June 3, 2005

Wendy J. Keezel
Chief of Enforcement
Motor Carrier Services & Enforcement Division
Bureau of Transportation and Safety
P. O. Box 3265
Harrisburg, PA 17105-3265

DOCKETED

JUN 13 2005

RECEIVED
BUREAU OF
TRANSPORTATION & SAFETY
2005 JUN -8 AM 10:03

**Re: Pennsylvania Public Utility Commission
Bureau of Transportation and Safety vs.
Adams Moving & Hauling, Inc.
PUC Docket Number: A-00112192C0501**

Dear Ms. Keezel:

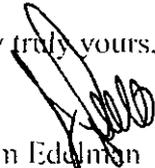
At the suggestion of my attorney, Richard T. Mulcahey, Jr., Schubert, Bellwoar, Cahill & Quinn, I am writing this letter in response to the complaint that was filed in the above-captioned matter. I am not going to contest the allegations.

My company performed the transportation at issue because the individual requesting service, Nora Potamkin, insisted that we move her back to Philadelphia. A few years ago we moved her household from Philadelphia to Greencastle, Pennsylvania. The move was extremely difficult because Ms. Potamkin, in our opinion, is somewhat eccentric. In fact, she called the police on our movers because my employees refused to move old urine-stained mattresses and other soiled materials. My movers were required to wear masks and gloves to handle the household items.

When Ms. Potamkin decided to return to Philadelphia, she insisted, despite our objections, that we move her. Quite frankly, I am not sure any mover in the Greencastle area would have undertaken this move. We certainly did not want to take this job; but, we felt obligated to do so.

I hope this explanation will be placed in my file as mitigating circumstances for performing this service. In order to conclude this matter, I am enclosing a company check in the amount of \$250.00 covering the fine.

Very truly yours,


Adam Edelman
President

**DOCUMENT
FOLDER**

cc: Richard T. Mulcahey, Jr., Esquire

VALLEY FORGE CORPORATE CENTER

915 MADISON AVENUE, NORRISTOWN, PA 19403 • TEL: 610 650 8321 • FAX: 610 650 8325