

3/20/06

To Whom it may concern,

Here is the \$100 payment for Mambo Movers, Inc. A-00115371C0501 for penalties incurred. If there are any further questions please contact us at (215) 670-9535.

Thank You

Peter Danz  
Vice President  
Mambo Movers, Inc.

RECEIVED  
2005 MAR 23 AM 9:25  
PA.P.U.C.  
SECRETARY'S BUREAU

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**RECEIPT**

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

DATE: 3/28/2006  
RECEIPT NO: 183628

MAMBO MOVERS  
1440 LOMBARD STREET  
PHILADELPHIA PA 19146

**DOCUMENT  
FOLDER**

PUC VS. MAMBO MOVERS

Fine for the violation of Pa Public Utility Law

Docket Number A-00115371C0501..... \$100.00

REVENUE ACCOUNT: 001420-017000-101

CHECK NUMBER: US PMO 08970652258  
CHECK AMOUNT: \$100.00

Stephen Reed  
(for Department of Revenue)

**DOCKETED**  
MAR 30 2006

COPY



RECEIVED

May 2, 2006

MAY 02 2006

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

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Re: Mambo Movers, Inc. A-00115371C0501

Dear Secretary McNulty:

Mambo Movers, Inc. (Petitioner) respectfully encloses herewith an original and three (3) copies of a Petition for Reinstatement of common carrier Certificate No. A-00115371 based on the facts contained herein.

Enclosed and marked Exhibit 1 is an Order of the Pennsylvania Public Utility Commission which was adopted January 12, 2006 and entered January 25, 2006 cancelling Respondents operating authority under Docket No. A-00115371.

The reason initially for the Complaint was failure to maintain evidence of cargo insurance on file with this Commission, a violation of the Public Utility Code at 66 Pa. C.S. 512, 51 Pa. Code 32.2(c) and 52 Pa. Code 32.11(a), 32.12(a) or 32.13(a).

Respondent researched from Commission's Public Record a history of its complaints. Including this Complaint a total of three (3) have been recorded. All three (3) complaints specifically pertain to failure to maintain evidence of cargo insurance. The first complaint C0301 opened 7-25-03 and closed 8-16-03. The second complaint C0401 opened 10-4-04, however due to an administrative oversight at the Commission the close date was not recorded.

There is no record of any consumer complaint filed against Respondent.

Also enclosed and marked Exhibit 2 is a letter addressed to Mr. Ken Sataloff, President of Sataloff Transportation Consultants, Inc. Mr. Sataloff is our Transportation Consultant and received the enclosed exhibit from Mr. Tim Karczewski of Caputo Insurance Agency.

James J. McNulty  
Secretary  
Pennsylvania Public Utility Commission

- 2 -

May 2, 2006

Mr. Karczewski is the current insurance agent for Respondent.

Please note that Respondent did notify its agent that the Commission had not received the cargo insurance filings for the 2004/05 coverage period. Two (2) separate cargo insurance filings were made for Respondent, but in both instances the Commission has indicated not receiving either one of the filings.

Respondent as well has remitted to the Commission a \$100.00 fine.

Respondent continually makes every effort to annually meet the tariff, insurance and assessment compliance with the Pennsylvania Public Utility Commission in order to protect its operating authority.

Respondent depends on its Pennsylvania operating authority as well as its interstate operating authority transporting household goods in use to provide service to the general public. The revocation of its Pennsylvania operating authority will result in a fatal financial condition.

Respondent is also aware everyday of non-certificated companies taking away moving business from them in the Philadelphia, PA market.

Your Respondent respectfully prays that the Pennsylvania Public Utility Commission will reinstate Certificate No.A-00115371 in an expeditious manner so that it can again provide professional moving service to the residents of Pennsylvania.

Respectfully submitted,



Peter Danz  
Vice President  
PS/ss  
Enclosures

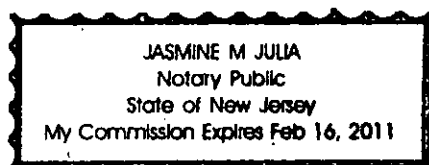
cc: Mr. Tim Karczewski - Caputo Insurance Agency

Sworn and described before me this 2 day of May, 2006. My Commission expires Feb. 16, 2011.



Signature of Official Administering Oath

PETITION MAILED FIRST CLASS CERTIFIED RETURN RECEIPT REQUESTED.



PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17105-3265

Public Meeting held January 12, 2006

Commissioners Present:

Wendell F. Holland, Chairman  
James H. Cawley, Vice Chairman  
Bill Shane  
Kim Pizzingrilli  
Terrance J. Fitzpatrick

Pennsylvania Public Utility Commission  
v.  
Mambo Movers, Inc.

A-00115371C0501  
A-00115371, Fs. 1 & 2

ORDER

BY THE COMMISSION:

On August 29, 2005, the Bureau of Transportation and Safety instituted a Complaint against Mambo Movers Inc, respondent, alleging failure to maintain evidence of cargo insurance on file with this Commission, a violation of the Public Utility Code at 66 Pa C.S. §512, 52 Pa. Code §32.2(c), and 52 Pa. Code §32.11(a), §32.12(a) or §32.13(a).

In accordance with 52 Pa. Code §5.61, the Bureau of Transportation and Safety notified the Respondent that, unless its insurer files evidence of insurance with this Commission, Respondent must file an Answer to the Complaint within twenty days of the date of service. The Notice further specified that, if respondent failed to answer the Complaint within twenty days, the Bureau of Transportation and Safety would request the Commission issue an order which cancels respondent's Certificate of Public Convenience.

The Complaint was sent to respondent on or about August 30, 2005 and was returned on September 22, 2005 as unclaimed. The insurance Complaint was resent first class mail on September 26, 2005 and to date, has not been returned. To date, more than twenty days later, respondent has failed to file an Answer to the Complaint and has failed to have its insurer file evidence of insurance with this Commission.

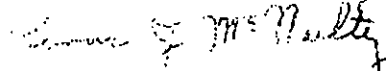
THEREFORE, IT IS ORDERED:

1. That the allegations in the Complaint are deemed to be admitted.
2. That the Complaint is hereby sustained.
3. That the Certificate of Public Convenience, issued to respondent at A-00115371 Fs. 1 & 2, are hereby cancelled.
4. That Respondent is assessed a fine in the amount of \$100 for failing to comply with the provisions of 66 Pa. C.S. §512. Payment must be made by certified check or money order payable to the Pa. Public Utility Commission, P.O. Box 3265, Harrisburg, PA 17105-3265.
5. That Respondent is hereby notified to cease and desist from further violations of the Public Utility Code, 66 Pa. C.S. §§101, et seq. and the regulations of the Commission, 52 Pa. Code §§1.1, et seq. In view of the cancellation of respondent's Certificate of Public Convenience, it is specifically prohibited from rendering service as a common carrier by motor vehicle in intrastate commerce in the Commonwealth of Pennsylvania.
6. That should Respondent wish to again begin household goods transportation operations in the Commonwealth of Pennsylvania, respondent must file a Petition for Reinstatement of its Certificate for good cause, in accordance with the provisions of 52 Pa. Code §5.41(a) and 1 Pa. Code §35.17. An original and three copies shall be filed within 15 days of receipt of this letter. The Petition shall be filed with the Secretary, PA Public Utility Commission, P.O. Box 3265, Harrisburg, PA 17105-3265. A copy of the Petition must also be served on the Bureau of Transportation and Safety and all other parties to the proceeding. The Commission will either grant or deny the Petition. If the Petition is denied or a timely Petition is not filed, Respondent must file a new application for authority in order to obtain a Certificate of Public Convenience. The Commission will assess the following five factors in deciding whether to grant or deny a Petition for Reinstatement: (1) Respondent's violation history of Commission rules and regulations, (2) Respondent's outstanding obligations to the Commission, such as monetary penalties, assessments, and insurance filings, (3) the timeliness of Respondent's filing of the Petition from the date of cancellation of its Certificate, (4) Respondent's rationale given for the violation resulting in the cancellation of its Certificate, and (5) Respondent's solution to prevent future violations of Commission rules and regulations. Respondent's Petition for Reinstatement should address each of these five factors. Further, the Petition must be accompanied by an Affidavit or Verification stating: "that the facts above set forth are true and correct to the best of my knowledge, information and belief. 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" as set forth at 52 Pa. Code §1.36. The Verification must be signed and dated. Respondent must pay all outstanding assessments and fines before this Commission will act on a Petition for

Reinstatement. Payment must be made by certified check or money order payable to the Pa. Public Utility Commission, P.O. Box 3265, Harrisburg, PA 17105-3265.

7. Should respondent wish to again begin transportation operations in the Commonwealth of Pennsylvania, respondent must file a new application for authority in order to obtain a Certificate of Public Convenience. The respondent must pay all outstanding assessments and fines before this Commission will act on an application for authority.

BY THE COMMISSION



James J. McNulty  
Secretary

(SEAL)

ORDER ADOPTED: January 12, 2006

ORDER ENTERED: JAN 25 2006



EXHIBIT 2

**CAPUTO**  
*Insurance Agency, Inc.*

6824 Big Beaver Boulevard  
P.O. Box 350  
Beaver Falls, PA 15010-0350

724.843.3020  
724.843.6586 fax

www.caputoinsurance.com

April 28, 2006

Mr. Ken Sataloff  
Sataloff Transportation Consultants, Inc.  
P.O. Box 1385  
Mt. Laurel, NJ 08054-7385

RE: Mambo Movers, Inc  
Certificate # A-00115371

Dear Ken:

Please find enclosed a copy of the Form H that was issued by Century Surety Company to the PA PUC for policy year 6/24/04-05. The certificate was sent on August 20, 2004 directly to the PA PUC. We have requested the Form H for the 6/24/05-06 policy through Travelers Insurance Company (upon receipt, it will be faxed to your office).

Once the insurance carrier advises our office that the Form H has been completed and sent there is no further follow up from our office. Normal procedure would be, if the PUC claims they did not receive the Form H, we would then contact the insurance carrier to have the form issued again. In this instance, the Insured did advise us on August 13 2004 that the PUC did not receive the Form H, we advised the insurance carrier and had the Form H issued again, and a copy for verification was faxed to our office.. (copy attached)


We recently became aware of a problem with the PUC when his Mambo Movers Auto policy renewed. We called the PUC and was advised that the problem was with the Cargo filing not the auto filing. The PUC claim that they never received the Form H for the 06/24/04-05 policy period.

*The Smarter Coverage*



We advised the insured to pay the fine and proceed to get their PUC authority reinstated. Once this is done, we will follow up for both the auto and cargo insurance carriers to refile the Form E and H. Please advise our office when their reinstatement is completed.

Sincerely,



Tim Karczewski

Caputo Insurance Agency

E-mail address: [tkarczewski@caputoinsurance.com](mailto:tkarczewski@caputoinsurance.com)

attachments

**Form H**  
**Uniform Motor Carrier Cargo**  
**Certificate of Insurance**

Filed with Pennsylvania Public Utility Commission (hereinafter called Commission)  
(Name of Commission)

This is to certify, that the Century Surety Company  
(Name of Company)

herein after called Company) of 465 Cleveland Avenue, Westerville, OH, 43082  
(Home Office Address of Company)

has issued to MAMBO MOVERS, INC.  
(Name of Motor Carrier)

of 1449 LOMBARD STREET, PHILADELPHIA, PA, 19146  
(Address of Motor Carrier)

A policy or policies of insurance effective from 08/25/2004 12:01 A.M. standard time at the address of the insured stated in said policy or policies and continuing until cancelled as provided herein, which, by attachment of the Uniform Motor Carrier Cargo Insurance Endorsement has or have been amended to provide cargo insurance covering the obligations imposed upon such motor carrier by the provisions of the motor carrier law of the State in which the Commission has jurisdiction or regulations promulgated in accordance therewith.

Whenever requested, the Company agrees to furnish the Commission a duplicate original of said policy or policies and all endorsements thereon.

This certificate and the endorsement described herein, may not be cancelled without cancellation of the policy to which it is attached. Such cancellation may be effective by the Company or the insured giving thirty (30) days' notice in writing to the State Commission, such thirty (30) days' notice to commence to run from the date notice is actually received in the office of the Commission.

Countersigned 465 Cleveland Avenue, Westerville, OH, 43082 this 20th day of  
(STREET ADDRESS) (CITY) (STATE) (ZIP CODE)

Aug 20 04

Insurance Company File No. 01CCP314137  
(Policy Number)

Amy Crandall  
(Authorized Company Representative)



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

IN REPLY  
PLEASE REFER  
TO OUR FILE

May 18, 2006

A-00115371

PETER DANZ  
VICE PRESIDENT  
MAMBO MOVERS  
1440 LOMBARD STREET  
PHILADELPHIA PA 19146

Dear Mr. Danz:

We are returning your Petition for Reinstatement. Please refer to paragraph 6 of order. Your petition was not timely filed so you must file a new application for authority.

Sincerely,

James J. McNulty  
Secretary

Enclosure

ksb

**DOCKETED**

MAY 31 2006



**ORIGINAL**

**COPY**

May 24, 2006

**RECEIVED**

MAY 25 2006

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

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Re: Mambo Movers, Inc. A-00115371C0501

Dear Secretary McNulty:

On May 2, 2006 I filed with your Commission a Petition for Reinstatement of our common carrier authority under Certificate No. A-00115371.

On May 18, 2006, under your signature, I received a notice returning our Petition for Reinstatement on the basis of an untimely filing, and indicating we must file a new application for authority.

Mambo Movers, Inc. provides common carrier service to the general public in the Philadelphia, PA area transporting household goods in use. We purchased this authority from James Stewart on or about April 2001.

Since that time we have complied with all tariff, assessment and insurance requirements except for brief periods of time with respect to cargo filings.

During the entire period that we have held this operating authority we have received no consumer complaints.

We provide excellent service to the Pennsylvania residents often handling valuable personal effects which require great attention in view of their age, value and irreplaceable possibilities.

We are Petitioning your Commission under the provisions of Pa. Code, Title 52, Sub Section 1.91 "Application for Waiver of Formal Requirements".

**DOCUMENT  
FOLDER**

The non-compliance by your records of our cargo coverage, and certainly an inadvertent mistake on our part not responding to the Order from Public Meeting held on January 12, 2006, has caused us to lose the most important asset in providing transportation of household goods in use within the scope of our previously active authority. It is the only type of work we know in order to make a living. The permanent loss of this authority will cause us to close our business that we have worked so strenuously to succeed, and all because we made an inadvertent mistake in not timely responding to your Order. Everyone should be entitled to make a mistake and not pay such a terrible price.

We expect our insurance agent and the insurance carrier itself to provide your Commission with timely filed Certificates of Insurance. We certainly pay our premiums in a timely manner or be cancelled.

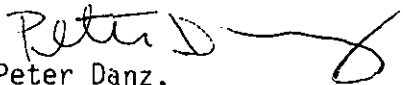
You will note from the enclosed Petition for Reinstatement of Authority that our insurance carrier filed twice the Certificate of Cargo coverage, but for some unknown reason your Commission indicates no receipt of this filing. It is not from a lack of effort that cargo insurance coverage was not met.

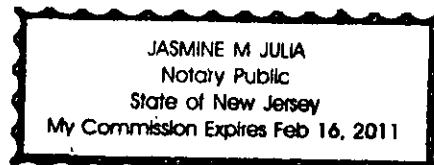
One of our attachments to the Petition for Reinstatement of Authority is a letter from Mr. Tim Karczewski clearly indicating that our company did advise him on August 13, 2004 that the Pa. P.U.C. did not receive Form H, and that Mr. Karczewski advised the insurance carrier to file another Form H again.

Secretary McNulty, we respectfully request that consideration be given to reinstate our critically needed household goods in use operating authority in an expeditious manner so that we have some chance of surviving this horrific situation, and not losing everything we have worked so hard to build.

There are non-certificated companies providing household goods in use service everyday in spite of the efforts of the Pa. P.U.C. Please do not further penalize the legitimate moving company from providing excellent service to the residents within the Philadelphia area.

Respectfully submitted,

  
Peter Danz,  
Vice President  
PD/ks  
Enclosures  
cc: Chairman Wendell Holland



Sworn and subscribed before me this 24 day of May, 2006. My Commission expires Feb. 16, 2011.

  
Signature of Official Administering Oath

PETITION MAILED FIRST CLASS CERTIFIED RETURN RECEIPT REQUESTED.

DATE: May 31, 2006

SUBJECT: A-00115371  
A-00115371C0501

TO: Law Bureau

FROM: James J. McNulty, Secretary *KB*

Mambo Movers, Inc.

Attached is a copy of a Petition for Waiver under PA Code Title 52, Sub Section 1.91, filed by Mambo Movers, Inc. in connection with the above docketed proceeding.

This matter is assigned to your Bureau for appropriate action.

Attachment

cc: TAS-Director  
OSA

ksb

DOCUMENT  
FOLDER

DOCKETED

MAY 31 2006