



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

September 24, 2019

Via Hand Delivery

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission, Bureau of Investigation and
Enforcement v. Mickey Jadallah d/b/a ABC Moving Service, LLC
Docket No. C-2019-_____
I&E Formal Complaint

Dear Secretary Chiavetta:

Enclosed for filing, please find the **Formal Complaint** in the above referenced case on behalf of the Bureau of Investigation and Enforcement (I&E) of the Pennsylvania Public Utility Commission.

Copies have been served on the parties of record as identified in the attached Certificate of Service. Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Christopher M. Andreoli
Prosecutor
Bureau of Investigation & Enforcement
PA Attorney I.D. No. 85676
(717) 705-4366
chandreoli@pa.gov

RECEIVED
2019 SEP 24 PM 1:04
PA PUC
SECRETARY'S BUREAU
FRONT DESK

CMA/ac
Enclosure

cc: Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2019-
	:	
Mickey Jadallah d/b/a	:	
ABC Moving Service, LLC,	:	
Respondent	:	

NOTICE

- A. **You must file an Answer within 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 Letter. See 52 Pa. Code §1.56(a). The Answer must raise all factual and legal arguments that you wish to claim in your defense, include the docket number of this Complaint, and be verified. You may file your Answer by mailing an original to:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Or, you may eFile your Answer using the Commission's website at www.puc.pa.gov. The link to eFiling is located under the Filing & Resources tab on the homepage. If your Answer is 250 pages or less, you are not required to file a paper copy. If your Answer exceeds 250 pages, you must file a paper copy with the Secretary's Bureau.

Additionally, a copy should either be mailed to:

Christopher M. Andreoli, Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Or, emailed to Mr. Andreoli at: chandreoli@pa.gov

- B. If you fail to answer this Complaint within 20 days, the Bureau of Investigation and Enforcement will request that the Commission issue an Order imposing the requested relief.

- C. You may elect not to contest this Complaint by paying the civil penalty within 20 days. Send only a certified check or money order made payable to the "Commonwealth of Pennsylvania", with the docket number indicated, and mailed to:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

- D. If you file an Answer which either admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request the Commission to issue an Order imposing the requested relief set forth in this Complaint.
- 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 penalty set forth in the Complaint and may impose additional and/or alternative penalties as appropriate.
- F. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code § 1.21.
- G. Alternative formats of this material are available for persons with disabilities by contacting the Commissioner's ADA Coordinator at (717) 787-8714.

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement,
Complainant

v.

Mickey Jadallah d/b/a
ABC Moving Service, LLC,
Respondent

Docket No. C-2019

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SEP 24 2019

FORMAL COMPLAINT

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

NOW COMES the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission, by its prosecuting attorneys, pursuant to Section 701 of the Public Utility Code, 66 Pa.C.S. § 701, and files this Formal Complaint (“Complaint”) against Mickey Jadallah d/b/a ABC Moving Service, LLC (“ABC Moving,” “Company” or “Respondent”) alleging violations of the Public Utility Code and attending Regulations. In support of its Complaint, I&E respectfully avers as follows:

Parties and Jurisdiction

1. The Pennsylvania Public Utility Commission (“PUC” or “Commission”), with a mailing address of 400 North Street, Harrisburg, PA, 17120, is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth pursuant to the Public Utility Code, 66 Pa.C.S. §§ 101, *et seq.*

2. Complainant is the Commission’s Bureau of Investigation and Enforcement

and is the entity established to prosecute complaints against public utilities pursuant to 66

Pa.C.S. §308.2(a)(11). Complainant's counsel is as follows:

Christopher M. Andreoli
Prosecutor
chandreoli@pa.gov
717.772.8582

Michael L. Swindler
Deputy Chief Prosecutor
mswindler@pa.gov
717.783.6369

3. Respondent is Mickey Jadallah d/b/a ABC Moving Service, LLC, with its principal place of business located at 2438 South 5th Street Rear, Allentown, PA 18103.

4. Respondent holds itself out to be a household goods carrier, but it lacks Commission authority to provide or furnish transportation of household property for compensation within the Commonwealth as a common carrier by motor vehicle or a contract carrier by motor vehicle, pursuant to Sections 102 and 2501(b)(1) of the Public Utility Code. 66 Pa.C.S. §§ 102 and 2501(b)(1).

5. Section 501(a) of the Public Utility Code, 66 Pa.C.S. § 501(a), authorizes and obligates the Commission to execute and enforce the provisions of the Public Utility Code.

6. Section 701 of the Public Utility Code, 66 Pa.C.S. § 701, authorizes the Commission, *inter alia*, to hear and determine complaints against public utilities or companies holding themselves out to be a public utility for violations of any law or regulation that the Commission has jurisdiction to administer or enforce.

7. Section 3310 of the Public Utility Code, 66 Pa.C.S. § 3310, authorizes the Commission to impose civil penalties on any person or corporation operating as a common carrier by motor vehicle or as a contract carrier by motor vehicle without a certificate of public convenience, permit, or license authorizing the service performed. Section 3310(c) specifically provides that a civil penalty of Five Thousand Dollars (\$5,000) be imposed for a first violation of this section while a civil penalty of Ten Thousand Dollars (\$10,000) shall be imposed for a second or subsequent violation.¹

8. Respondent, by providing or furnishing the transportation of household property between points within the Commonwealth by motor vehicle for compensation is subject to the power and authority of this Commission pursuant to Section 501(c) of the Public Utility Code, 66 Pa.C.S. § 501(c), which requires a public utility to comply with Commission regulations and orders.

¹ Section 3310 of the Public Utility Code, 66 Pa.C.S. § 3310, which was amended and made effective on February 20, 2018, authorizes the Commission to impose the following penalties on any person or corporation who operates as a common carrier or contract carrier by motor vehicle without a certificate of public convenience, permit, or license: (1) A \$5,000 civil penalty shall be imposed for a first violation and \$10,000 for a second or subsequent violation; (2) Suspension of the registration of any vehicle whereby a determination has been made that it operated as a common carrier or contract carrier by motor vehicle without the approval of the Commission in accordance with 75 Pa.C.S. § 1375; and (3) Confiscation and impoundment of vehicles which have been used to provide common carrier or contract carrier by motor vehicle without Commission approval, subject to the process for the disposition of impounded vehicles as set forth under 75 Pa.C.S. § 6310. Prior to this amendment, violations of the previous version of Section 3310 resulted in the person or company who operated as a motor carrier or a common carrier with the Commission's authority being found guilty of a summary offense for an initial violation, a misdemeanor of the third degree for subsequent offenses, and assessed a civil penalty under Section 3301 of the Public Utility Code, 66 Pa.C.S. § 3301, which was set at \$1,000 per violation. In addition, any person or company who held itself out to transport household goods and/or property without having operating authority from the Commission violated, and would continue to violate, under the amended Section 3310, Section 1101 of the Public Utility Code, 66 Pa.C.S. § 1101.

Background

9. PUC Motor Carrier Enforcement Division was contacted by a certificated household goods carrier and advised that Respondent was continuing to operate and transport household goods in violation of the Public Utility Code.

10. As part of this investigation, PUC Motor Carrier Enforcement Officer, Reynaldo Pierluisse, arranged a move of household goods with Respondent through a series of emails and telephone discussions. Respondent ultimately agreed to move household goods from a storage unit in Quakertown, PA to a storage unit in Whitehall, PA. The agreed upon price for this intrastate move was \$490.00 for four hours and \$120.00 for each additional hour thereafter.

11. Respondent arrived at the agreed upon meeting location in Quakertown, PA in a vehicle, which consisted of a combination truck and semi-trailer. The driver of the truck identified himself as Mickey Jadallah. The truck was a 2001 International with Pennsylvania Registration Number ZGW5153 and Vehicle Identification Number 1HTSLAAM31H404004. The truck was registered to Justin Juda Jadallah, who is the son of Mickey Jadallah. The semi-trailer was a Carmate with Pennsylvania Registration Number XGC2000 and Vehicle Identification Number 5A3C828D21L004485. The semi-trailer was registered to Harleysville National Bank & Trust Company with the lessee listed as ABC Hauling.

12. After discussing the agreed upon price for the move with Mickey Jadallah, Officer Pierluisse identified himself to Respondent as an Enforcement Officer with the Pennsylvania Public Utility Commission's Motor Carrier Division, and supporting Officers arrived to assist with the traffic stop and vehicle inspection.

13. Respondent was never issued a certificate of public convenience, permit, or license by the Commission authorizing such transportation of household property between points within the Commonwealth.²

Violation

14. All allegations in paragraphs 1-13 are incorporated as if fully set forth herein.

15. Section 3310(b) of the Public Utility Code states that any person or corporation that operates as a common carrier or contract carrier by motor vehicle (as defined in 66 Pa.C.S. §§ 102 and 2501(b)) without a certificate of public convenience, permit, or license issued by the Commission authorizing such service performed, in violation of Section 3310(a),³ “shall be ordered to pay [a civil] penalty as prescribed in subsection (c).” 66 Pa.C.S. § 3310(b) (emphasis added).

16. Respondent violated Section 3310(a) and (b) of the Public Utility Code, 66 Pa.C.S. §§ 3310(a)-(b), by operating as a common carrier and/or contract carrier by motor vehicle without a certificate of public convenience, permit, or license issued by the Commission when it agreed to transport the Resident’s household property between points within the Commonwealth for compensation.

17. Section 3310(c) of the Public Utility Code requires that “[t]he amount of the [civil] penalty under subsection (b) shall be \$5,000 for a first violation and \$10,000 for a

² Respondent previously held valid interstate authority from the USDOT under USDOT# 1164677 and MC# 473320. However, Respondent has never held authority from the Commission. It is noted that the Respondent previously tried and was unable to obtain a certificate of public convenience, permit, or license from the Commission due to protests by Commission certificated household goods carriers. As such, Respondent was aware that it was required to be certificated by the Commission, that it failed to become certificated, and that it was, therefore, operating in violation of the Public Utility Code.

³ 66 Pa.C.S. § 3310(a).

second or subsequent violation.” 66 Pa.C.S. § 3310(c) (emphasis added).⁴ I&E has concluded that Respondent has been found to have operated as a common carrier and/or contract carrier by motor vehicle without a certificate of public convenience, permit, or license on multiple prior occasions. As such, I&E’s requested civil penalty is \$10,000 for this violation.

18. In addition to the requested civil penalty above, a person or corporation under subsection (b) may also be subject to the following:

- (i) Suspension of registration under 75 Pa.C.S. § 1375 (relating to suspension of registration of unapproved carriers).
- (ii) Confiscation and impoundment of vehicle. A sheriff, upon an order issued by the court and having jurisdiction over the property, is empowered to confiscate and impound vehicles which have been used to provide common carrier by motor vehicle service or contract carrier by motor vehicle service in violation of subsection (b) or commission regulations. The process for the disposition of impounded vehicles shall be as set forth under 75 Pa.C.S. § 6310 (relating to disposition of impounded vehicles, combinations and loads).

WHEREFORE, for all the foregoing reasons, the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission respectfully requests that, after consideration of the record, the Office of Administrative Law Judge and the Commission

⁴ I&E researched the Respondent’s history and record with the Commission and concluded that this is not Respondent’s first violation in Pennsylvania. Respondent has a long history with the Commission and continues to operate as a common carrier and/or contract carrier by motor vehicle without a certificate of public convenience, permit, or license issued by the Commission. More recently, under Docket No. C-2015-2437081, a Complaint was filed by I&E against Respondent for violations of the Public Utility Code pursuant to Section 3310 of the Public Utility Code, 66 Pa.C.S. § 3310; this Complaint was eventually withdrawn by I&E, as the incident giving rise to the Complaint was criminally prosecuted before District Justice William Ford (Lehigh County) at Docket No. CP-39-CR-0005135-2014, wherein Respondent received and completed the ARD program. See Exhibit I&E-1. As such, Respondent was aware that it was required to be certificated by the Commission, that it failed to become certificated, and that it was, therefore, operating in violation of the Public Utility Code.

find the Respondent in violation of the count as set forth herein, and that the Respondent be assessed the statutorily mandated civil penalty of Ten Thousand Dollars (\$10,000), as this is not Respondent's first violation in Pennsylvania. In addition, the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission respectfully requests suspension of the registrations for the truck and semi-trailer by the proper authorities pursuant to 75 Pa.C.S. § 1375, as well as the confiscation and impoundment of the truck and semi-trailer pursuant to 75 Pa.C.S. § 6310. Should the Respondent fail to pay the statutorily mandated civil penalty of Ten Thousand Dollars (\$10,000), the Bureau of Investigation and Enforcement requests that this matter be referred to the Pennsylvania Office of Attorney General for appropriate action.

Respectfully submitted,



Christopher M. Andreoli
Prosecutor
PA Attorney I.D. No. 85676

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Date: September 24, 2019

Exhibit I&E-1



Lehigh County Court of Common Pleas
Court Summary

Jadallah, Mickey
Allentown, PA 18103

DOB: 12/16/1966

Sex: Male
Eyes: Brown
Hair: Brown
Race: White

Active

Lehigh

CP-39-MD-0003927-2009 Proc Status: Awaiting Hearing DC No: OTN:

Arrest Dt: Trial Dt: Legacy No:

Last Action: Last Action Date: Last Action Room:

Next Action: Next Action Date: Next Action Room:

Seq No	Statute	Grade	Description	Disposition
1	18 § 3304 §§ A1	S	Crim Misch/Dmg Prop Intent, Reckless, Or Neglig	

Closed

Lehigh

CP-39-CR-0005135-2014 Proc Status: Completed DC No: OTN:T5680463

Arrest Dt: Disp Date: 12/16/2014 Disp Judge: Ford, William E.

Def Atty: Almonti, Angelo T. - (PR)

Seq No	Statute	Grade	Description	Disposition
1	66 § 3310	M3	Unauthorized Operation/Camers & Brokers	ARD - County

CP-38-MD-0003926-2009 Proc Status: Completed DC No: OTN:

Arrest Dt: Disp Date: Disp Judge:

Seq No	Statute	Grade	Description	Disposition
1	18 § 2709 §§ A1	S	Harassment - Subject Other to Physical Contact	

CP-39-MD-0004024-2011 Proc Status: Completed DC No: OTN:

Arrest Dt: Disp Date: Disp Judge:

Northampton

CP-48-CR-0000122-2011 Proc Status: Sentenced/Penalty Imposed DC No: OTN:S1115063

Arrest Dt: 06/24/2010 Disp Date: 01/27/2011 Disp Judge: Zito, Leonard N.

Seq No	Statute	Grade	Description	Disposition
1	66 § 3302	M1	Criminal Penalties For Viols	Withdrawn
2	18 § 5503 §§ A1	S	Disorderly Conduct Engage In Fighting	Guilty Plea

Recent entries made in the court filing offices may not be immediately reflected on the court summary report. Neither the courts of the Unified Judicial System of the Commonwealth of Pennsylvania nor the Administrative Office of Pennsylvania Courts assume any liability for inaccurate or delayed data, errors or omissions on these reports. Court Summary Report information should not be used in place of a criminal history background check which can only be provided by the Pennsylvania State Police. Moreover an employer who does not comply with the provisions of the Criminal History Record Information Act may be subject to civil liability as set forth in 18 Pa.C.S. Section 9183.

Please note that if the offense disposition information is blank, this only means that there is not a "final disposition" recorded in the Common Pleas Criminal Court Case Management System for this offense. In such an instance, you must view the public web docket sheet of the case wherein the offense is charged in order to determine what the most up-to-date disposition information is for the offense.



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

IN REPLY PLEASE
REFER TO OUR FILE

August 15, 2016

Bohdan J. Zelechiwsky, Esq.
527 Hamilton Street, Lower Level
Allentown, PA 18101

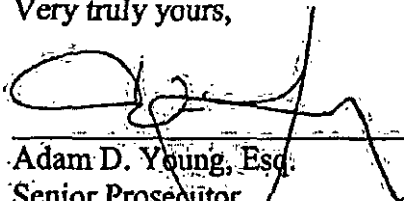
**Re: Pa. Public Utility Commission, Bureau of Investigation and
Enforcement v. Mickey Jadallah d/b/a ABC Moving Service, LLC
Docket No. C-2015-2437081**

Dear Mr. Zelechiwsky:

This letter is to inform you that the Bureau of Investigation and Enforcement (I&E) intends to withdraw the Complaint filed against Mickey Jadallah d/b/a ABC Moving Service, LLC (Respondent) in the above-captioned case. The incident giving rise to this administrative complaint was criminally prosecuted before District Justice William E. Ford at Docket No. CP-39-CR-0005135-2014, wherein Mr. Jadallah received, and subsequently completed, the ARD program. Accordingly, I&E does not intend to further pursue this incident in an administrative forum.

Pursuant to 52 Pa Code § 5.94, you have twenty (20) days to object to the withdrawal of this Complaint. If no party objects within twenty (20) days of service of this letter, this case will be marked closed.

Very truly yours,



Adam D. Young, Esq.
Senior Prosecutor
Bureau of Investigation and Enforcement

cc: Rosemary Chiavetta, Secretary

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Magisterial District Judge 03-2-09

DOCKET

Docket Number: MJ-03209-NT-0000159-2013

Non-Traffic Docket



Commonwealth of Pennsylvania
v.
Mickey Jadallah

Page 1 of 2

CASE INFORMATION

<u>Judge Assigned:</u>	Jacqueline M. Taschner	<u>Issue Date:</u>	
<u>OTN:</u>		<u>File Date:</u>	07/31/2013
<u>Arresting Agency:</u>	Motor Carrier Enforc, PUC	<u>Arrest Date:</u>	
<u>Citation #:</u>	P 9972488-1	<u>Disposition:</u>	Guilty Plea
<u>County:</u>	Northampton	<u>Disposition Date:</u>	08/20/2013
<u>Township:</u>	Forks Township	<u>Case Status:</u>	Closed

STATUS INFORMATION

<u>Case Status</u>	<u>Status Date</u>	<u>Processing Status</u>
Closed	08/20/2013	Completed
	08/20/2013	Case Balance Due
	08/20/2013	Case Disposed/Penalty Imposed
	08/20/2013	Awaiting Sentencing
	07/31/2013	Awaiting Plea

DEFENDANT INFORMATION

<u>Name:</u>	Jadallah, Mickey	<u>Sex:</u>	Male
<u>Date of Birth:</u>	12/16/1966	<u>Race:</u>	Unknown/Unreported
<u>Address(es):</u>	Home		
	Allentown, PA 18103		

CASE PARTICIPANTS

<u>Participant Type</u>	<u>Participant Name</u>
Arresting Officer	Groves, Benjamin
Defendant	Jadallah, Mickey

CHARGES

<u># Charge</u>	<u>Grade</u>	<u>Description</u>	<u>Offense Dt.</u>	<u>Disposition</u>
1 66 § 3310	S	Unauthorized Operation/Carriers & Brokers	07/31/2013	Guilty Plea

DISPOSITION / SENTENCING DETAILS

<u>Case Disposition</u>	<u>Disposition Date</u>	<u>Was Defendant Present?</u>
Guilty Plea	08/20/2013	Yes

<u>Offense Seq./Description</u>	<u>Offense Disposition</u>
1 Unauthorized Operation/Carriers & Brokers	Guilty Plea

COURT OF COMMON PLEAS OF NORTHAMPTON COUNTY

DOCKET



Docket Number: CP-48-CR-0000122-2011
CRIMINAL DOCKET

Court Case

Commonwealth of Pennsylvania

Page 2 of 3

v.
Mickey Jadallah

CHARGES

Seq.	Orig Seq.	Grade	Statute	Statute Description	Offense Dt.	OTN
1	1	M1	66 § 3302	Criminal Penalties For Viols	08/24/2010	S1115063
2	2	S	18 § 5503 §§A1	Disorderly Conduct Engage In Fighting	06/24/2010	S1115063

DISPOSITION SENTENCING/RENALTIES

<u>Disposition</u>	<u>Disposition Date</u>	<u>Final Disposition</u>
<u>Case Event</u>	<u>Offense Disposition</u>	<u>Grade</u> <u>Section</u>
<u>Sequence/Description</u>	<u>Sentence Date</u>	<u>Credit For Time Served</u>
<u>Sentencing Judge</u>	<u>Incarceration/Diversiory Period</u>	<u>Start Date</u>
<u>Sentence/Diversion Program Type</u>		
<u>Sentence Conditions</u>		
<u>Linked Offense - Sentence</u>	<u>Link Type</u>	<u>Linked Docket Number</u>
Lower Court Proceeding (generic)		
Lower Court Disposition	01/06/2011	Not Final
1 / Criminal Penalties For Viols	Waived for Court (Lower Court)	M1 66§3302
Guilty Plea - Negotiated		
Formal Arraignment	01/27/2011	Final Disposition
1 / Criminal Penalties For Viols	Withdrawn	M1 66§3302
Zito, Leonard N.	01/27/2011	
2 / Disorderly Conduct Engage In Fighting	Guilty Plea	S 18§5503§§A1
Zito, Leonard N.	01/27/2011	

COMMONWEALTH INFORMATION

ATTORNEY INFORMATION

Name: Constance Kaye Nelson, Esq.
District Attorney

Supreme Court No.: 087006

Phone Number(s):
(610) 559-3030 (Phone)
(610) 559-3035 (Fax)

Address:
Northampton County District Attorney's Office
669 Washington Street
Easton PA 18042

Name:

Supreme Court No.:

Rep. Status:

Phone Number(s):

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

ENTRIES

<u>Sequence Number</u>	<u>CP Filed Date</u>	<u>Document Date</u>	<u>Filed By:</u>
------------------------	----------------------	----------------------	------------------

Recent entries made in the court filing offices may not be immediately reflected on these docket sheets. Neither the courts of the Unified Judicial System of the Commonwealth of Pennsylvania nor the Administrative Office of Pennsylvania Courts assume any liability for inaccurate or delayed data, errors or omissions on these reports. Docket Sheet information should not be used in place of a criminal history background check which can only be provided by the Pennsylvania State Police. Moreover an employer who does not comply with the provisions of the Criminal History Record Information Act may be subject to civil liability as set forth in 18 Pa.C.S. Section 9183.

COURT OF COMMON PLEAS OF NORTHAMPTON COUNTY

DOCKET



Docket Number: CP-48-CR-0000122-2011

CRIMINAL DOCKET

Court Case

Commonwealth of Pennsylvania

Page 3 of 3

v.

Mickey Jadallah

ENTRIES

<u>Sequence Number</u>	<u>CP Filed Date</u>	<u>Document Date</u>	<u>Filed By</u>
1	12/16/2010		MDJ-03-2-03
Police Criminal Complaint			
2	12/16/2010		MDJ-03-2-03
Arrest Warrant Issued - NCIC/CLEAN Delay			
2	01/04/2011		MDJ-03-2-03
Preliminary Arraignment Held			
1	01/11/2011		Court of Common Pleas - Northampton County
Original Papers Received from Lower Court			
1	01/19/2011		Court of Common Pleas - Northampton County
Criminal Court Scheduled 5/9/2011 9:00AM			
1	01/27/2011		Court of Common Pleas - Northampton County
Arraigned			
2	01/27/2011		Zito, Leonard N.
Guilty Plea - Negotiated			
3	01/27/2011		Zito, Leonard N.
Order - Sentence/Penalty Imposed			



Northampton County Court of Common Pleas
Court Summary

Jadallah, Mickey
Allentown, PA 18103

DOB:12/16/1966

Sex:Male
Eyes:Brown
Hair:Unknown or Completely Bald
Race:Caucasian

Closed

Northampton
CP-48-CR-0000122-2011
Arrest Dt: 08/24/2010

Proc Status: Sentenced/Penalty imposed DC No:
Disp Date: 01/27/2011 Disp Judge: Zilo, Leonard N.

OTN:S1115083

Seq No	Statute
1	66 § 3302
2	18 § 5503

Grade	Description
M1	Criminal Penalties For Viols
S	Disorderly Conduct Engage In Fighting

Disposition
Withdrawn
Gilty Plea

Lehigh
CP-39-MD-0003926-2009
Arrest Dt:

Proc Status: Completed DC No:
Disp Date: Disp Judge:

OTN:

Seq No	Statute
1	18 § 2709

Grade	Description
S	Harassment - Subject Other to Physical Contact

Disposition

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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ABC MOVING SERVICE

Local and Long Distance



Serving ALL of Pennsylvania and New Jersey
Licensed to Perform Out of State Relocations
as well as Local Moving within New Jersey
Low Cost Moving • Free Estimates • Free Boxes
Also offering: Basement • Attic • Estate Clean-Outs

Mick Jadallah - Owner

2438 South 5th St
Allentown, PA 18103
abcmovingusa@gmail.com

USDOT # 1164877
MC # 473320
NJ FM # 000858

PA & NJ 484-230-1111
Fully Insured







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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



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SEP 24 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement,
Complainant

v.

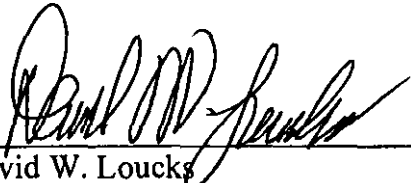
Mickey Jadallah d/b/a
ABC Moving Service, LLC,
Respondent

Docket No. C-2019

VERIFICATION

I, David W. Loucks, Chief of Enforcement, Bureau of Investigation and Enforcement, Motor Carrier Enforcement, 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 the Bureau of Investigation and Enforcement will 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: September 24, 2019



David W. Loucks
Chief of Motor Carrier Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement,
Complainant

v.

Mickey Jadallah d/b/a
ABC Moving Service, LLC,
Respondent

Docket No. C-2019-

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Formal Complaint** dated September 24, 2019, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

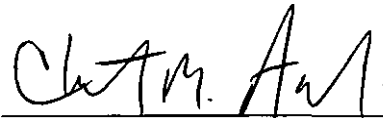
Served via First Class Mail

Mickey Jadallah d/b/a ABC Moving Service, LLC
2438 South 5th Street Rear
Allentown, PA 18103

RECEIVED

SEP 24 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



Christopher M. Andreoli
Prosecutor
Bureau of Investigation & Enforcement
PA Attorney I.D. No. 85676