BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION :

BUREAU OF INVESTIGATION AND ENFORCEMENT :

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V. : DOCKET NO. C-2022-3027247

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ALL MY SONS OF PITTSBURGH LLC :

2400 OLD MILL ROAD :

CARROLLTON TX 75007 :

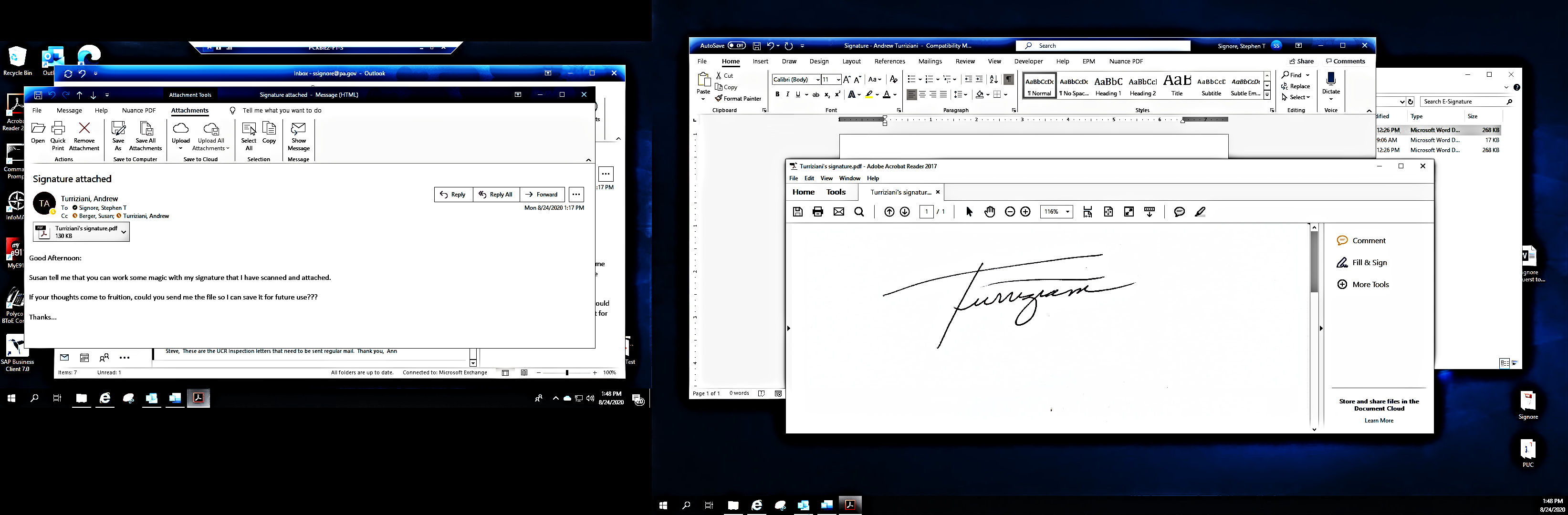
COMPLAINT

The Pennsylvania Public Utility Commission (Commission) is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth. The Commission has delegated its authority to initiate proceedings which are prosecutory in nature to the Bureau of Investigation and Enforcement and other bureaus with enforcement responsibilities. Pursuant to that delegated authority and Section 701 of the Public Utility Code, the Bureau of Investigation and Enforcement hereby represents as follows:

1. That All My Sons of Pittsburgh LLC, Respondent, maintains its principal place of business at 150 54TH Street, Pittsburgh, Pennsylvania, 15201 with a mailing address of 2400 Old Mill Road, Carrollton, Texas, 75007.
2. That Respondent was issued a certificate of public convenience authorizing transportation of household goods by this Commission on June 15, 2021, at Pa. PUC utility code 8923758.
3. That an informal complaint was filed at the Commission alleging violations of the PUC regulations have occurred during a move performed by the Respondent.
4. That on July 28, 2021, PUC Enforcement Officer Andrew Rosenberger met with general manager Samuel Standish and regional manager Carey O’Brien at the principal place of business at 150 54th St., Pittsburgh, Allegheny County, Pa. and investigated the complaint regarding a move that occurred in Pittsburgh, Allegheny County, Pa. on Saturday, July 10, 2021. Officer Rosenberger requested all moving forms at that time, but Respondent was unable to provide completed and signed forms for the move.
5. That the information for shippers’ form was not provided 48 hours before the move.
6. That the estimated cost of services form was not provided to shipper within 48 hours before the move.
7. That a completed and signed bill of lading form was not provided.
8. That Respondent charged an amount more than the amount specified by the tariff for the move.
9. That Respondent, by failing to provide the information to shippers 48 hours in advance of a move, violated 52 Pa. Code §31.121(c). The penalty for this violation is $250.00.
10. That Respondent, by failing to provide an estimated cost of services, violated 52 Pa. Code §31.122(a). The penalty for this violation is $250.00.
11. That Respondent, by failing to provide a completed bill of lading, violated 52 Pa. Code §31.132(b). The penalty for this violation is $250.00.
12. That Respondent, by failing to adhere to the designated tariff rate and charging a rate other than that specified in the approved tariff, violated Public Utility Code, 66 Pa. C.S. §1303. The penalty for this violation is $500.00.

WHEREFORE, the Bureau of Investigation and Enforcement prosecutory Staff hereby requests that the Commission fine All My Sons of Pittsburgh, LLC the sum of one thousand, two hundred and fifty dollars ($1,250.00) for the illegal activity described in this Complaint and order such other remedy as the Commission may deem to be appropriate.

Respectfully submitted,



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Andrew Turriziani, Chief

Motor Carrier Enforcement

Bureau of Investigation and Enforcement

P.O. Box 3265

Harrisburg, PA  17105‑3265

VERIFICATION

I, Andrew Turriziani, 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 that the Bureau will be able to prove 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.

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Description automatically generated with medium confidence

Date: \_\_January 11, 2022\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Andrew Turriziani, Chief

Motor Carrier Enforcement

Bureau of Investigation and Enforcement

**NOTICE**

1. 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 outcome. 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 **shall be mailed to:**

Rosemary Chiavetta, Secretary

Pennsylvania Public Utility Commission

400 North Street, 2nd Floor

Harrisburg, Pennsylvania 17120

Or you may eFile your Answer using the Commission’s website at [www.puc.pa.gov](http://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:

Michael L. Swindler, Deputy Chief Prosecutor

Pennsylvania Public Utility Commission

Bureau of Investigation and Enforcement

400 North Street

Harrisburg, PA 17120

Or, e-mailed to Mr. Swindler at: RA-PCCmplntResp@pa.gov

1. If you fail to answer this complaint within twenty (20) days, the Bureau of Investigation and Enforcement will request that the Commission issue a Secretarial Letter imposing a penalty. The penalty could include a fine, the suspension or revocation of your certificate of public convenience or other remedy.
2. 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:

Rosemary Chiavetta, Secretary

Pennsylvania Public Utility Commission

400 North Street

Harrisburg, PA  17120

1. 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.
2. If you file an Answer, which admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request that the Commission issue a Secretarial Letter imposing a penalty.
3. 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.
4. Alternative formats of this material are available for persons with disabilities by contacting the Commission’s ADA Coordinator at 717-787-8714.