



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

April 10, 2024

**Via Electronic Filing**

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

Re: Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement v.  
Riverfront Moving & Storage LLC  
Docket No. C-2024-3047348  
**I&E Motion for Default Judgment**

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Bureau of Investigation and Enforcement's Motion for Default Judgment in the above-referenced proceeding. Copies have been served on the parties of record in accordance with the Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Colby B. Widdowson', is written over a light blue circular stamp.

Colby B. Widdowson  
Prosecutor  
Bureau of Investigation & Enforcement  
PA Attorney ID No. 326185  
(717) 787-2139  
[cwiddowson@pa.gov](mailto:cwiddowson@pa.gov)

CW/ac  
Enclosures

cc: Michael L. Swindler, Deputy Chief Prosecutor (via email – [mwindler@pa.gov](mailto:mwindler@pa.gov))  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2024-3047348
	:	
Riverfront Moving & Storage LLC,	:	
Respondent	:	

**NOTICE TO PLEAD**

The Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) has filed a Motion for Default Judgment in the above-captioned matter, pursuant to the Commission’s regulations at 52 Pa. Code § 5.103. You are hereby notified to file a written response within twenty (20) days of the service of the Motion, consistent with 52 Pa. Code § 5.61.

Your Answer must be verified, pursuant to 52 Pa. Code § 1.36, and the original sent to:

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

Additionally, you must serve a copy on the undersigned prosecutor.



\_\_\_\_\_  
Colby B. Widdowson  
Prosecutor  
PA Attorney ID No. 326185

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(717) 787-2139  
[cwiddowson@pa.gov](mailto:cwiddowson@pa.gov)

Dated: April 10, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2024-3047348
	:	
Riverfront Moving & Storage LLC,	:	
Respondent	:	

**MOTION FOR DEFAULT JUDGMENT**

NOW COMES the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Investigation and Enforcement (“I&E”), by its prosecuting attorney, and files this Motion for Default Judgment against Riverfront Moving & Storage LLC (“Respondent”) pursuant to Section 5.103 of the Commission’s regulations, 52 Pa. Code § 5.103. In support thereof, I&E respectfully represents as follows:

1. I&E commenced this action on March 13, 2024, by filing a Formal Complaint.
2. I&E hereby incorporates by reference the Complaint that it filed in this proceeding on March 13, 2024.
3. The Complaint alleged that Respondent committed the following violations of the Commission’s regulations:
  - a. Violation of 52 Pa. Code § 31.132(a), in that Respondent failed to provide a bill of lading to a shipper that contained and identified its PUC issued carrier certificate number;
  - b. Violation of 52 Pa. Code § 31.132(a), in that Respondent failed to provide a bill of lading to a shipper that identified and listed the acceptable methods of payment;

- c. Violation of 52 Pa. Code § 31.121(a), in that Respondent failed to provide the shipper with the Commission supplied form entitled “Information for Shippers;” and
  - d. Violation of 52 Pa. Code § 31.121(b), in that Respondent failed to retain an executed copy of the certification and Information for Shippers form.
4. Respondent’s mailing address on file with the Commission is: 201 Mill Street, Unit 1, Bristol, PA 19007.
5. Respondent’s invoice indicates an address of P.O. BOX 2063, Bristol, PA 19007. See I&E’s Formal Complaint Exhibit 1.
6. On March 13, 2024, the Complaint was served via First-Class Mail and Certified Mail, Return Receipt Requested, to the following addresses:
  - a. 201 Mill Street, Unit 1, Bristol, PA 19007; and
  - b. P.O. BOX 2063, Bristol, PA 19007.
7. Attached to the Complaint was a Notice advising Respondent that it must file an Answer within twenty (20) days of service of the Complaint.
8. The Notice also advised Respondent that if it failed to answer the Complaint, I&E would request that the Commission issue an Order imposing the penalty set forth in the Complaint.
9. The twenty (20) days to file an Answer to the Complaint expired on April 2, 2024.
10. The First-Class mailings sent to both addresses were not returned and are presumed to have been delivered.

11. The Certified Mailings, Return Receipt Requested, used tracking numbers 9171 9690 0935 0276 6791 98 and 9489 0090 0027 6600 6860 15 and were delivered on March 15, 2024, and March 21, 2024, respectively. See attached I&E Exhibit 1.

12. As of the date of this filing, Respondent has failed to file an Answer to the Complaint.

13. Pursuant to Section 5.61(c) of the Commission's regulations, a Respondent who fails to file an Answer to a Complaint within the 20-day response period may be deemed in default, and the relevant facts stated in the Complaint may be deemed admitted. 52 Pa. Code § 5.61(c).

14. The Commonwealth Court has upheld the Commission's authority to sustain complaints that are not answered within twenty days. *See Fusaro v. Pa. Pub. Util. Comm'n*, 382 A.2d 794, 797 (Pa. Cmwlth. 1978).

15. Section 3301 of the Public Utility Code, 66 Pa.C.S. § 3301, authorizes the Commission to impose civil penalties, up to \$1,000.00, on any public utility or any other person or corporation subject to the Commission's authority for violation(s) of the Public Utility Code and/or Commission regulations. Section 3301(a)-(b) of the Public Utility Code, 66 Pa.C.S. § 3301(a)-(b), allows for the imposition of a separate civil penalty for each violation and each day's continuance of such violation(s).

16. I&E respectfully requests that the Commission enter a Default Order against Respondent that:

- a. Deems Respondent to be in default, and finds the relevant facts stated in the Complaint to be deemed admitted;
- b. Orders assessed a cumulative civil penalty of One Thousand Dollars (\$1,000.00), or Two Hundred Fifty Dollars (\$250.00) per violation; and

- c. Should Respondent fail to pay the civil penalty upon Order of the Commission, orders this matter be referred to the Pennsylvania Office of Attorney General for collection of outstanding amounts due and any other appropriate action.

Respectfully submitted,



Colby B. Widdowson  
Prosecutor  
PA Attorney ID No. 326185

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(717) 787-2139  
[cwiddowson@pa.gov](mailto:cwiddowson@pa.gov)

Date: April 10, 2024

**I&E**  
**Exhibit 1**

April 3, 2024

Dear Colby Widdowson:

The following is in response to your request for proof of delivery on your item with the tracking number:  
**9489 0090 0027 6600 6860 15.**

#### Item Details

<b>Status:</b>	Delivered, Individual Picked Up at Post Office
<b>Status Date / Time:</b>	March 21, 2024, 1:40 pm
<b>Location:</b>	BRISTOL, PA 19007
<b>Postal Product:</b>	First-Class Mail®
<b>Extra Services:</b>	Certified Mail™ Return Receipt Electronic

#### Recipient Signature

Signature of Recipient:



Address of Recipient:

J R Ream  
PO BOX 2063  
BRISTOL, PA 19007-0863

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,  
United States Postal Service®  
475 L'Enfant Plaza SW  
Washington, D.C. 20260-0004



April 3, 2024

Dear Colby Widdowson:

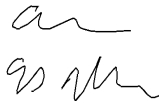
The following is in response to your request for proof of delivery on your item with the tracking number:  
**9171 9690 0935 0276 6791 98.**

#### Item Details

<b>Status:</b>	Delivered, Left with Individual
<b>Status Date / Time:</b>	March 15, 2024, 2:42 pm
<b>Location:</b>	BRISTOL, PA 19007
<b>Postal Product:</b>	First-Class Mail®
<b>Extra Services:</b>	Certified Mail™ Return Receipt Electronic

#### Recipient Signature

Signature of Recipient:



Address of Recipient:

201 MILL ST, BRISTOL, PA  
19007

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,  
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475 L'Enfant Plaza SW  
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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2024-3047348
	:	
Riverfront Moving & Storage LLC,	:	
Respondent	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Motion for Default Judgment, in the manner and upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**Served via Electronic and First-Class Mail**

Riverfront Moving and Storage, LLC  
Attn: Dante Reeves  
201 Mill Street, Unit 1  
Bristol, PA 19007

[riverfrontmovingandstorage@gmail.com](mailto:riverfrontmovingandstorage@gmail.com)

Riverfront Moving and Storage, LLC  
Attn: Dante Reeves  
P.O. BOX 2063  
Bristol, PA 19007



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Colby B. Widdowson  
Prosecutor  
PA Attorney ID No. 326185  
Bureau of Investigation and Enforcement  
(717) 787-2139  
[cwiddowson@pa.gov](mailto:cwiddowson@pa.gov)

Dated: April 10, 2024