

Karen O. Moury  
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May 14, 2024

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

RE: Application of Little Justins Moving for Household Goods in Use Authority  
Docket No. A-2024-\_\_\_\_\_

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Application of Little Justins Moving seeking authority to transport household goods in use between points in Pennsylvania. If anything further is required, please contact the undersigned.

Thank you for your attention to this matter.

Sincerely,

*/s/ Karen O. Moury*

Karen O. Moury

Enclosure

## Application for Motor Common Carrier or Motor Contract Carrier of Household Goods in Use.

THIS APPLICATION IS REQUIRED TO REQUEST A CERTIFICATE OF PUBLIC CONVENIENCE (FOR COMMON CARRIERS) OR PERMIT (FOR CONTRACT CARRIERS) TO OPERATE AS A COMMERCIAL CARRIER OF HOUSEHOLD GOODS IN USE.

1. **Legal Name of Applicant** (Individual, Partnership or Corporation)

Lindsey Croto (Individual)

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- If you are an individual who has not formed any type of corporate entity, you should enter your name **as it will appear on your insurance documents**.
- If you are filing for a partnership, but **not a limited liability partnership**, the names of all partners must be entered on this line. Those names should be entered **as they will appear on your insurance documents**. This includes husbands and wives filing jointly.
- If you are filing for a corporate entity (corporation, limited liability company, or limited liability partnership), **even if you are the sole shareholder member**, you must enter the name **exactly as it appears on the registration papers from the Corporation Bureau of the Pennsylvania Department of State**.

2. **Trade Name** (Attach a copy of fictitious name registration if applicable)

Little Justins Moving. The fictitious name registration is No. 4176935. Copy is attached.

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This is any name which you will be operating under which differs from the **LEGAL NAME OF APPLICANT**. A **TRADE NAME** is considered a **FICTITIOUS NAME** if the identity of the applicant cannot be readily determined. *EXAMPLE: John Doe is the applicant and wants to use the name "Johnboy Trucking" as his trade name. People cannot readily determine that John Doe is the actual operator; therefore, the name is fictitious and must be registered as such. Trade names such as "John Doe Trucking" or "J. Doe Trucking" are not considered fictitious and would not have to be registered.*

3. **Do you currently hold PUC Authority?**  NO **Previous Authority?**  NO

**If YES, at PUC No. A-** \_\_\_\_\_

4. **Are you a business entity registered with the PA Dept. of State?**  NO

If NO, you must register (see checklist on how to register)

**If YES, provide your PA Corporation Bureau Entity ID Number** N/A

(See checklist and indicate type of business entity registered)

5. **If either a Corporation or Limited Liability Company, please list members (LLC) or shareholders and officers (Corporation).**

N/A  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. **Mailing Address**

400 West Main Street (Suite 5)  
Street Address  
Ephrata, PA 17522 Lancaster  
City, State and Zip Code County  
717-381-5065 littlejustinsmoving@gmail.com  
Telephone Number E-Mail Address

*This is the e-mail address to which the Commission will send all official documents issued by the Commission until further notice.*

7. **Physical Address** (if different from Mailing Address. Do no use a PO Box.)

N/A  
Street Address  
\_\_\_\_\_  
City, State and Zip Code County  
\_\_\_\_\_  
Telephone Number E-Mail Address

The address entered here should reflect the actual location of the business. This is the address the Commission needs in order to dispatch Enforcement Officers to inspect equipment. If left blank, it will be assumed that the **PHYSICAL ADDRESS** is the same as the **MAILING ADDRESS**

8. **Attorney** (if applicable)

Karen O. Moury, Eckerts Seaman Cherin & Mellott, 717-571-1420  
Attorney's Name & Telephone Number for this Filing  
213 Market Street, 8th Floor, Harrisburg, PA 17101 kmoury@eckertseamans.com  
Attorney's Address E-mail Address

An attorney's name should only be entered if an attorney is filing the application for a client and the application is being sent under the attorney's cover letter.

9. **Does applicant have a USDOT Number?**

X No \_\_\_\_\_ Yes, at No. \_\_\_\_\_

10. **Describe the service area proposed by this application.**

(Use the space below or attach additional sheet if space provided is not sufficient).

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To transport household goods in use between points in Pennsylvania, including all counties within the state.

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*Examples:*

- *To transport household goods in use between points in Pennsylvania.*
- *To transport household goods in use from points in Centre County to points in Pennsylvania, and vice versa.*

11. **Certification:**

Applicant certifies that it is not now engaged in unauthorized intrastate transportation for compensation between points in Pennsylvania and will not engage in said transportation unless and until authorization is received from the Pennsylvania Public Utility Commission.

Applicant further certifies that it understands the requirements of the Pennsylvania Public Utility Commission, especially as they relate to safety and insurance and that it may be subject to civil penalties, suspension or cancellation of the Certificate for failure to comply with Commission requirements.

Applicant further certifies that it understands that it is subject to an annual assessment based upon its reported gross Pennsylvania intrastate revenues; said assessment to help defray expenses incurred in regulating Motor Common Carriers of Household Goods in Use; and acknowledges that failure to report revenue and pay its annual assessment may result in civil penalties, suspension or cancellation of the certificate.

## Verification of Application

I/We hereby state that the statement(s) made in this application is/are true and correct to the best of my/our knowledge and belief.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Lindsey Croto

(Print Name)

*/s/ Lindsey Croto*

(Signature)

May 14, 2024

(Date)

The verification of the application must be completed by the applicant appearing on Line 1 of the application by the named individual, all partners if a partnership, a member (if a limited liability company), or by the President or Secretary (if a corporation).

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE  
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS  
401 NORTH STREET, ROOM 206  
P.O. BOX 8722  
HARRISBURG, PA 17105-8722  
[WWW.CORPORATIONS.STATE.PA.US/CORP](http://WWW.CORPORATIONS.STATE.PA.US/CORP)

Little Justins Moving

THE BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS IS HAPPY TO SEND YOU YOUR FILED DOCUMENT. THE BUREAU IS HERE TO SERVE YOU AND WANTS TO THANK YOU FOR DOING BUSINESS IN PENNSYLVANIA.

IF YOU HAVE ANY QUESTIONS PERTAINING TO THE BUREAU, PLEASE VISIT OUR WEB SITE LOCATED AT [WWW.CORPORATIONS.STATE.PA.US/CORP](http://WWW.CORPORATIONS.STATE.PA.US/CORP) OR PLEASE CALL OUR MAIN INFORMATION TELEPHONE NUMBER (717)787-1057. FOR ADDITIONAL INFORMATION REGARDING BUSINESS AND / OR UCC FILINGS, PLEASE VISIT OUR ONLINE "SEARCHABLE DATABASE" LOCATED ON OUR WEB SITE.

ENTITY NUMBER: 4176935

Lindsey Croto Jr  
108F N Reading Rd # 108  
Ephrata, PA 17522

## VERIFIED STATEMENT OF APPLICANT

THE FOLLOWING INFORMATION IS REQUIRED BY THE COMMISSION TO DETERMINE THE APPLICANT'S FITNESS TO OPERATE. STATEMENTS SHOULD BE TYPED OR PRINTED. ILLEGIBLE STATEMENTS WILL DELAY YOUR APPLICATION.

Lindsey Croto

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**Legal Name of Applicant**

Little Justins Moving

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**Trade Name, if any**

400 West Main St. (Suite 5)	Ephrata	PA	17522
<b>Street Address (principal place of business)</b>	<b>City or Municipality</b>	<b>State</b>	<b>Zip Code</b>

The Verified Statement of the Applicant factual details about your proposed transportation service. Your Verified Statement must answer all of the items listed below and on the following pages. Provide as much information as possible to prevent delay in processing your application. If you need more space to provide your answer, please attach additional pages identifying the appropriate item number.

1. Identify the person making the Verified Statement on behalf of the applicant. If an employee/officer of applicant is making the statement, give name, title, business address and telephone number.

Lindsey Croto (self)  
400 West Main St. (Suite 5)  
Ephrata, PA 17522  
717-381-5065

2. List the applicant's affiliation (owner, manager, controls) with any other carrier, with the description of affiliation.

N/A. Applicant is not affiliated with any other carrier.

3. Please provide evidence of minimum of two-years' experience with a licensed household goods carrier or the equivalent as required by 52 Pa. Code §3.381(c)(1)(iii)(A)(II)(-I).

Please see Attachment A.

4. Describe your facilities, record maintenance plan and your communication network. Please include a description of your physical location, to including office machines that will be utilized, and the facility to house vehicles. As a carrier of household goods in use, applicant should include a description of storage facilities, if applicable. Please include an explanation of your plan to maintain records required by the PUC, as well as normal business records. In regard to your communication network, please explain how you will receive customer requests for transportation, how you will dispatch the vehicles to fulfill the request, and how you will maintain continuous communication with your drivers.

Please see Attachment B.

5. Please state the number of drivers you intend to use or hire in your business and explain why that number of drivers is appropriate for the size of the territory you will be serving. In addition, please explain:
  - a. Your hiring standards for drivers;
  - b. Your system for conducting criminal background checks;
  - c. Your driver training program;
  - d. Your system for conducting driver license checks;
  - e. Your policies regarding alcohol and drug use by your drivers.

We intend to use 2 drivers at the outset, which we believe is appropriate for the region in which we would primary work. Over time, the number of drivers will depend upon how many full-service moving requests we receive. As the need to hire additional drivers arise we are prepared to hire them to meet that demand.

Please see Attachment C for remaining response regarding driver standards.

6. Please state the number of vehicles you plan to use in your business and why that number is appropriate to provide reasonable and efficient service to the territory you will be serving. If you have already obtained vehicles for your business, please list them in the chart below.

<b>YEAR</b>	<b>MAKE</b>	<b>MODEL</b>	<b>SEATING CAPACITY*</b>	<b>VEHICLE ID #</b>	<b>MILEAGE</b>
2012	Dodge	Ram	5	1C6RD7NT0CS170933	156,000

We would have a contract with Penske in place, reserving trucks on an as-needed basis. Renting a Penske truck for a day will be done for specific full-service moving job assignments. It would most likely be on Penske truck (no larger than 26 feet) at a timme.

7. Describe your vehicle safety program. Please include the following in your explanation:
  - a. Your periodic vehicle maintenance plan
  - b. Your system for ensuring your vehicles will continuously comply with applicable Pennsylvania vehicle equipment standards (67 Pa. Code, Chapter 175).

a. Little Justins Moving Company will outline regular checks and tasks for each vehicle. This would include oil changes, tire rotations, brake inspections, fluid top-ups, and overall system checks at set intervals, such as every 3 months or after a certain mileage threshold. Additionally, scheduling annual inspections by a certified mechanic ensures compliance with safety regulations and identifies any potential issues early on. Drivers will be responsible to perform pre-trip inspections of the vehicle to ensure that the vehicle is operating properly and safely. Our plan will also include keeping detailed records of all maintenance performed on each vehicle to ensure compliance with regulations and to track the vehicle's maintenance history.

b. We will follow a proactive maintenance schedule for all vehicles, including periodic checks and servicing of essential components to comply with applicable PA vehicle equipment standards. The vehicles will be annually inspected in accordance with PennDot vehicle equipment and inspection regulations. When we would partner with Penske truck providers, we would ensure that they adhere to Pennsylvania's vehicle equipment standards. It would be our responsibility to ensure that all parts and components used for maintenance and repairs meet PA state regulations. By implementing this system, Little Justins Moving Company can ensure that its vehicles continuously comply with applicable Pennsylvania vehicle equipment standards, promoting safety, efficiency, and regulatory compliance.

8. Please explain what steps you have taken to determine if you can obtain insurance and pay the required insurance premiums.

We have obtained commercial and cargo insurance policies:

- 1) Commercial insurance through Progressive. Policy Number: 971785990. NAIC Number: 11770
- 2) Cargo/General Liability insurance through: AFCO. Acct Number: 02-20732171-73

Applicant believes that these policies exceed the minimum requirements established by the Commission's regulations and will ensure that it obtains appropriate insurance so that acceptable evidence is submitted by the carrier.

9. State whether the applicant has been convicted of a misdemeanor or felony. If applicant is partnership, limited liability partnership, corporation, or limited liability company this question applies to all members, officers, and/or shareholders. If "YES", explain.

YES       NO

Please see Attachment D.

10. Financial Data. Complete the "Statement of Financial Position", which follows this page. Please feel free to also provide additional information explaining why you believe you have sufficient funds to ensure your transportation business can provide reliable service to the public in a safe manner.

### Verification of Statement

The undersigned deposes and says that he/she is authorized to and does make this verification and that the facts set forth therein are true and correct to the best of his/her knowledge, information, and belief. The undersigned understands that false statements herein are made subject to penalties of 18 Pa. C. S. Section 4904 relating to unsworn falsification to authorities.

*/s/ Lindsey Croto*

(Signature)

Lindsey Croto

(Name and Title, printed or typed)

May 14, 2024

(Date)

**Statement of Financial Position (Balance Sheet)**  
**As of (date) 5/7/2024**  
**(Must be less than 6 months old)**

ASSETS

Current Assets		
Cash	\$3,000	
Other Current Assets (specify)	0	
Total Current Assets		\$3,000
Tangible Assets		
Motor Vehicle Equipment	\$13,500	
Property (buildings, land, etc.)	\$45,000	
Office Equipment		
TOTAL ASSETS		\$61,500

LIABILITIES

Current Liabilities (Due within one year of date)		
Loans	0	
Credit cards/revolving credit	0	
Other Liabilities (Attach schedule)	0	
Total Current Liabilities		0
Long Term Liabilities (Due after one year of date)		
Mortgage	0	
Long term commercial loan	0	
Other Liabilities (Attach Schedule)	0	
Total Long-Term Liabilities		0
TOTAL LIABILITIES		0

# **Attachment A**

## Attachment A – Response to Question #3 in Verified Statement

Applicant has the equivalent of a minimum of two-years' experience" with a licensed household goods carrier as required by 52 Pa. Code §3.381(c)(1)(iii)(A)(II)(-1-). While the Commission's regulations do not define the "equivalent" of such experience, the Commission's order proposing the regulations explained the need for this requirement as being to ensure that only those applicants who are familiar with the industry would be eligible to operate. *Proposed Rulemaking Amending 52 Pa. Code Chapters 3, 5, 23, 31; Household Goods in Use Carriers and Property Carriers*, Docket No. L-2013-2376902 (Order entered September 12, 2013), at 6.

In adjudicating several recent applications, the Commission has found that if an applicant has gained experience providing the labor services for a household goods operation, this experience satisfies the Commission's fitness standard as it shows familiarity with the industry. See *Application of Kelvin D. Ferguson & Sons LLC*, Docket No. A-2022-2036486 (Order entered August 24, 2023); *Application of Moving by Cury, LLC*, Docket No. A-2022-3036613, 2023 W.L. 358190 (Order entered January 19, 2023); *Application of Exceptional Movers LLC for Carrier of Household Goods in Use Authority*, Docket No. A-2021-3029208 (Order entered June 16, 2022).

Mr. Lindsey Croto, Applicant in this proceeding, operated Little Justins Moving from 2010 through 2015 solely as a labor services provider. Mr. Croto obtained this work through "Hire a Helper" and gained valuable experience developing a personalized moving strategy for each customer that was tailored to their timeline, budget and preferences. These efforts included packing, providing packing materials, assembly/disassembly services and special handling of antiques and appliances. Applicant's team also offered tips to customers who opted to do their own packing, such as choosing the size of boxes, securing them, marking them, noting their destination room and creating an inventory list.

When customers asked Mr. Croto to perform full service moves in or around 2016, he began to occasionally accommodate these requests although the business still primarily focused on the aspects of moves that do not entail transportation. When Mr. Croto learned from the enforcement staff at the Commission that a certificate of public convenience is required for the transportation component of a household goods in use move, he promptly secured legal counsel, paid an optional fine and resumed his prior business model that does not include transportation.

Assisting customers with smooth moves is what Mr. Croto has done for nearly 15 years – basically his entire adult working life. While to him the labor services are the most critical aspect of the business as they focus on taking the utmost care of his customers' valuable possessions, he continues to receive requests for full-service moves. Customers today, perhaps more than ever, prefer "one-stop shopping," and if Mr. Croto cannot provide the full array of services they desire, he will likely not be able to succeed in this business despite his experience and devotion to his clients over many years.

The granting of this Application will provide authority for full service moving services that customers are seeking. This outcome is consistent with a competitive household goods use market in Pennsylvania.

# **Attachment B**

## **Attachment B – Response to Question #4 in Verified Statement**

Little Justins Moving operates from a central office equipped with modern office machines to manage customer inquiries and record-keeping. Our physical office location is situated at Ephrata Business Center. We have a well-equipped workspace with essential office equipment, including computers, printers, and phones, to efficiently manage logistics. We have designated areas for moving supplies such as furniture hand trucks, dollies, straps, boxes, tools, and any other equipment our teams may need for full service moving jobs. Additionally, our facility includes a designated area to house vehicles, ensuring proper maintenance and easy access for our moving teams. Our physical location includes a designated parking lot for vehicle storage that is monitored by a security camera 24/7. We plan to lease/rent a moving truck that will be stored in a secured parking lot at our facility. We do not plan to store customers' belongings at our facilities. As a carrier of household goods, we would load, transport and unload customer's goods, but not store them.

We commit to maintaining meticulous records in accordance with PUC regulations, implementing a thorough record maintenance strategy. Our inventory and customer information tracking will be handled through a digitized system, ensuring privacy compliance by avoiding the display of personal information in shared spaces. To safeguard against data loss, we conduct regular database backups. Physical records will be securely stored in a fire-resistant, locked file cabinet in our office.

Our communication network will be designed to facilitate customer requests, optimize vehicle dispatch, and maintain constant contact with drivers, ensuring a smooth moving experience. For comprehensive moving services, clients can make requests through our website's booking system, email, or phone calls. We'll use cell phones for real-time coordination among moving teams. If an employee does not have a cellphone, they will be given a company phone to use during working hours. We've chosen the "Housecall Pro" software, a cloud-based field service management app, to automate workflows. This system aids in job scheduling, GPS tracking, dispatching, payment processing, estimates, automated receipts and invoices, real-time customer notifications, and text messaging. With this software, we would be able to track employees' real-time arrival and departure at customers' residences. Our workers will stay in communication with our office staff from pre-arrival to job completion.

# Attachment C

## Attachment C – Response to Question #5 in Verified Statement

- a. Your hiring standards for drivers.

Our hiring standards for drivers is that they must be at least 21 years of age and hold a valid current PA driver’s license, a clean driving record, and driving experience. A thorough background check will be conducted to ensure reliability and trustworthiness. Many moving companies require drug testing to ensure a substance-free workplace. A clean driving record and a commitment to safety are crucial.

- b. Your system for conducting criminal background checks.

Little Justin Movings' comprehensive criminal background check system involves accessing databases containing criminal records, court records, and law enforcement information. It includes verification of identity, searching for convictions, arrests, and sometimes additional checks like sex offender registries. The process adheres to legal regulations and privacy standards to ensure accuracy and fairness. We are partnered with Porch Moving Group who conducts our criminal background checks on our new and existing employees annually. Additionally, their third-party partner will continuously monitor employee records to ensure they are up-to-date. Porch Moving Group runs background re-checks once per year to main the “background checked badge” on our business profile. Included are reviews of criminal history records from the PA State Police and every state where the person has resided for the last 12 months and re-checks every 2 years through the PA State Police.

- c. Your driver training program.

Our driver training program would cover essential skills such as safe driving practices, proper vehicle operation, loading and unloading techniques, and customer service. It will include modules on defensive driving, route planning, and handling special items. Practical training sessions and assessments will be part of the program to ensure drivers are proficient in maneuvering trucks, securing loads, and complying with traffic regulations. Regular refresher courses can help maintain a high standard of safety and efficiency. New applicants will need to take a written and practical exam to show their competency and understanding of current motor vehicle laws and company safety policies.

- d. Your system for conducting driver license checks.

Driver history will be reviewed in each state where the person held a license during the past 3 years. In Pennsylvania, to conduct driver license checks, we would be accessing the Pennsylvania Department of Transportation (PennDOT) online records. This process will include submitting driver information, such as name and license number, to the PennDOT database. We plan to utilize their new enhanced Online Services that is created for businesses who obtain driver histories for the purpose of employment. We will file the application for each driver online and pay the appropriate fee. It will be essential for us to

ensure data security and confidentiality throughout the process to adhere to the privacy laws. Similar processes that are available in other jurisdictions will be utilized as necessary for drivers who have held licenses elsewhere.

- e. Your policies regarding alcohol and drug use by your drivers.

We have a “Zero Tolerance Policy” which is a clear stance on zero tolerance for alcohol and illegal drug use while on duty. We will perform a mandatory drug and alcohol testing as part of the pre-employment screening process. Periodic and random drug and alcohol testing for current employees to deter substance abuse. Policy to be in place for drug and alcohol testing after any accidents or incidents to ensure the driver’s sobriety wasn’t a contributing factor. We will have guidelines on recognizing and reporting signs of impairment on the job. In the employee handbook, we will have clearly defined consequences for violations, which may include disciplinary actions, up to and including termination.

# **Attachment D**

## Attachment D – Response to Question #9 on Verified Statement

Lindsey Croto had the following two felony/misdemeanor convictions in 2006 and 2007. Explanations of each are included.

### 1. CP-36-CR-0003316-2007

#### Charges/Outcome

- F3 – Acc Involving Death/Injury-Not Properly Licensed, 4/16/07, 75 P.S. § 3742.2§§A – Guilty Plea, Probation 5 years
- (Lesser Summary violations; no further penalty)

#### Timeline/Court

- Filing Date: 7/23/07
- County: Lancaster; Court Office: CP-02-36-Crim

#### Other Notes

- DL-38CCA sent to PennDOT – 1/13/21

#### Explanation

- This conviction resulted from an accident that occurred at a stop sign with a cornfield on the right side and a person was injured.
- Lindsey had moved here from Florida within the past two months and had not yet obtained a PA license (but had a FL one).
- He was offered 5 years' probation and took the deal.
- Probation has been over for nearly 15 years and has no bearing on his ability to legally operate a household goods moving business now.

### 2. CP-36-CR-0005935-2006

#### Charges/Outcome

- M2 – Simple Assault, 12/4/06, 18 § 2701 §§ A1
- M2 – False Imprisonment, 12/04/06
- Guilty Plea, Max of 23 months, Confinement 16 days

#### Timeline/Court

- Filing Date: 12/26/06
- County: Lancaster; Court Office: CP-02-36-Crim

#### Explanation

- These convictions resulted from a situation where Applicant prevented someone from coming into the building.
- By detaining individuals involved in the altercation, Lindsey was trying to prevent further escalation of violence and protect others present. This measure was taken to attempt to maintain order and deter future instances of disruptive behavior during that time, attempting to foster a safer environment for everyone present.
- This incident has no bearing on Lindsey's ability to legally operate a household goods moving business now.