



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

January 8, 2026

**Via Electronic Filing**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement v.  
Truck & Muscle Moving LLC  
Docket No. C-2025-3058403  
**I&E Motion for Default Judgment**

Dear Secretary Homsher:

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 black ink that reads 'Samantha N. Barbush'. The signature is written in a cursive style and is positioned above a horizontal line.

Samantha N. Barbush

Prosecutor

Bureau of Investigation & Enforcement

PA Attorney ID No. 331654

(717) 772-8582

[sbarbush@pa.gov](mailto:sbarbush@pa.gov)

SNB/nb

Enclosures

cc: Per Certificate of Service  
Allison C. Kaster, Chief Prosecutor, I&E (via email – [akaster@pa.gov](mailto:akaster@pa.gov))  
Brian Mehus, Chief, Motor Carrier, I&E (via email – [bmehus@pa.gov](mailto:bmehus@pa.gov))

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3058403
	:	
Truck & Muscle Moving LLC	:	
Respondent	:	

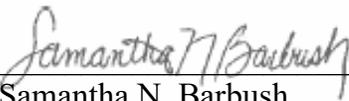
**NOTICE TO PLEAD**

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:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

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

  
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Samantha N. Barbush  
Prosecutor  
PA Attorney ID No. 331654

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street, 3W  
Harrisburg, PA 17120  
(717) 772-8582  
[sbarbush@pa.gov](mailto:sbarbush@pa.gov)

Dated: January 8, 2026

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3058403
	:	
Truck & Muscle Moving 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 Truck & Muscle Moving 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 November 7, 2025, by filing a Formal Complaint.
2. The Complaint alleged that 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 held itself out through advertising the transport of household goods between points within the Commonwealth for compensation.

3. On November 10, 2025, the Complaint was served by certified mail to Respondent, per 52 Pa. Code § 5.21(c), and a courtesy copy of the Complaint was electronically mailed to Respondent at [truckmusclepa@gmail.com](mailto:truckmusclepa@gmail.com).<sup>1</sup>

4. Attached to the Complaint was a Notice advising Respondent that it must file an Answer within twenty (20) days of service of the Complaint.

5. 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.

6. The twenty (20) days to file an Answer to the Complaint expired on November 30, 2025.

7. Respondent did not file an Answer to the Complaint.

8. 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).

9. 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).

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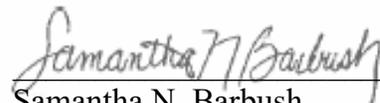
<sup>1</sup> Respondent's email address, [truckmusclepa@gmail.com](mailto:truckmusclepa@gmail.com), was confirmed by Respondent on February 12, 2025, to former PUC Motor Carrier Officer Aaron Ebersole, as Respondent acknowledged receipt of compliance information provided by Officer Ebersole.

10. I&E respectfully requests that the Commission enter a Default Order against

Respondent that:

- a. Finds Respondent in violation of Section 3310(a) and (b) of the Public Utility Code, 66 Pa.C.S. § 3310(a)-(b), for 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;
- b. Assesses Respondent the statutorily mandated administrative penalty of Five Thousand Dollars (\$5,000), pursuant to 66 Pa.C.S. § 3310(c);
- c. Notifies Respondent, that should Respondent fail to pay the statutorily mandated administrative penalty of Five Thousand Dollars (\$5,000) set forth in subparagraph (b), above, within thirty (30) days of the entry date of an Order of the Commission, this matter will be referred to the Pennsylvania Office of Attorney General for appropriate action; and
- d. Directs the Bureau of Administration, Assessment Section, to refer this matter to the Pennsylvania Office of Attorney General for collection of the total set forth in subparagraph (b), above, if Respondent fails to pay that total within thirty (30) days of the entry date of the Commission's Order.

Respectfully submitted,



Samantha N. Barbush

Prosecutor

PA Attorney ID No. 331654

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street, 3W  
Harrisburg, PA 17120  
(717) 772-8582  
[sbarbush@pa.gov](mailto:sbarbush@pa.gov)

Date: January 8, 2026

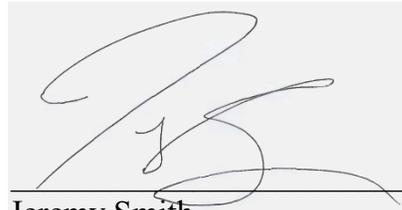
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Complainant	:	
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	:	
Truck & Muscle Moving LLC	:	
Respondent	:	

**VERIFICATION**

I, Jeremy Smith, Motor Carrier Enforcement Officer, 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 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: January 8, 2026



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Jeremy Smith  
Motor Carrier Enforcement Officer  
Bureau of Investigation and Enforcement

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

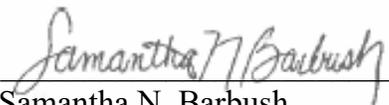
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Bureau of Investigation and Enforcement	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3058403
	:	
Truck & Muscle Moving LLC	:	
Respondent	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Motion for Default Judgment, dated January 8, 2026, upon the party, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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

Truck & Muscle Moving LLC  
Attn: Derrian Eugene Jackson  
161 Croyle Street  
Johnstown, PA 15905  
[truckmusclepa@gmail.com](mailto:truckmusclepa@gmail.com)

  
\_\_\_\_\_  
Samantha N. Barbush  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 331654  
(717) 772-8582  
[sbarbush@pa.gov](mailto:sbarbush@pa.gov)

Dated: January 8, 2026