



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

March 6, 2026

Via Electronic Filing

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd 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 Formal Complaint (Amended)

Dear Secretary Homsher:

Enclosed for electronic filing please find the Bureau of Investigation and Enforcement's ("I&E") **Amended Formal Complaint** in the above-captioned matter. This Amended Formal Complaint supersedes I&E's original Formal Complaint filed at the above docket on November 7, 2025.

The allegations of this Amended Formal Complaint remain the same as the original Formal Complaint that was sent to Truck & Muscle Moving LLC ("Respondent") via electronic mail on November 7, 2025, and Certified Mail on November 10, 2025. The purpose of this Amended Formal Complaint is to perfect service upon Respondent and append exhibits to support I&E's claims.

On January 8, 2026, I&E filed and served upon Respondent a Motion for Default Judgment via First-Class Mail and electronic mail, as a result of Respondent not answering the original Formal Complaint. On February 25, 2026, presiding Administrative Law Judge ("ALJ") Emily A. Farren issued an Interim Order denying I&E's Motion for Default Judgment, without prejudice, for I&E's failure to demonstrate Respondent received the original Formal Complaint. Further investigation reveals that the November 10, 2025 certified mailing that attempted to serve Respondent the original Formal Complaint was returned as undeliverable. Therefore, I&E files this Amended Formal Complaint to perfect service upon Respondent and also to add documents to support I&E's claims.

Copies are being served on the parties of record in accordance with the Certificate of Service. Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



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

SNB/nb
Enclosures

cc: Administrative Law Judge Emily A. Farren (*via email* – efarren@pa.gov)
Stephanie M. Wimer, Deputy Chief Prosecutor, I&E-Enf (*via email* – stwimer@pa.gov)
Brian Mehus, Chief, Motor Carrier (*via email* – bmehus@pa.gov)
As per Certificate of Service

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:

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
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.

In Addition to filing your Answer with the Commission’s Secretary, please electronically serve a copy on:

Samantha N. Barbush, Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street, 3rd Floor West
Harrisburg, PA 17120
sbarbush@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 and performing the requested relief 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:

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
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 the 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 Commission's ADA Coordinator at 717-787-8714.

**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	:	

AMENDED FORMAL COMPLAINT

NOW COMES the Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement (“I&E”), by its prosecuting attorneys, pursuant to Section 701 of the Public Utility Code, 66 Pa.C.S. § 701, and files this Amended Formal Complaint (“Amended Complaint”) against Truck & Muscle Moving LLC (“Truck & Muscle Moving LLC” or “Respondent”) alleging violations of the Public Utility Code and Pennsylvania Code. In support of its Amended Complaint, I&E alleges the following:

I. COMMISSION JURISDICTION AND AUTHORITY

1. The Pennsylvania Public Utility Commission (“Commission” or “PUC”), with a mailing address of Commonwealth Keystone Building, 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.* (“Code”).

2. Complainant is the Commission's Bureau of Investigation and Enforcement, which is the bureau established to take enforcement actions against public utilities and other entities subject to the Commission's jurisdiction pursuant to 66 Pa.C.S. § 308.2(a)(11); *See also Implementation of Act 129 of 2008; Organization of Bureaus and Offices*, Docket No. M-2008-2071852 (August 11, 2011) (delegating authority to initiate proceedings that are prosecutory in nature to I&E).

3. Complainant's prosecuting attorney is as follows:

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

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

6. Section 701 of the Code, 66 Pa.C.S. § 701, authorizes the Commission, *inter alia*, to hear and determine complaints against public utilities 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 administrative 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 an administrative penalty of Five Thousand Dollars (\$5,000) be imposed for a first violation of this section while an administrative 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.

II. BACKGROUND

9. Respondent is Truck & Muscle Moving LLC with a principal place of business at 161 Croyle Street, Johnstown, PA 15905.

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 administrative 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.

10. Respondent has a mailing address of 161 Croyle Street, Johnstown, PA 15905.
11. Respondent is a registered domestic limited liability company in the state of Pennsylvania since March 20, 2019.
12. Respondent is owned and operated by Derrian Eugene Jackson.
13. On or about November 26, 2024, the PUC received an informal complaint² regarding Respondent lacking authority from the PUC to conduct business.
14. On or about December 12, 2024, PUC Motor Carrier Enforcement Officer Aaron Ebersole was assigned the informal complaint, whereupon Officer Ebersole conducted a general utility search for any motor carrier known as “Truck and Muscle” on the Commission’s open-source website³, yielding no results for a certified business under such name. Officer Ebersole further conducted an internet search⁴ which yielded the discovery of Respondent’s Facebook page and current Google reviews. True and correct copies of the results of Officer Ebersole’s internet search are attached as I&E Exhibit 1.
15. On or about December 12, 2024, Officer Ebersole placed a telephone call to Respondent.⁵ Officer Ebersole inquired about moving services between two points in Johnstown, Cambria County, for a one-bedroom apartment. A man, self-identified as Derrian and as the owner of Truck & Muscle Moving LLC, provided that the cost would be \$175 per hour with a two-hour minimum and Respondent would provide the

² Docketed at Case No. Bp8#3052303.

³ www.puc.pa.gov/search/utility-authority-search.

⁴ The search was conducted using the words: “truck and muscle moving company Johnstown, pa.”

⁵ The telephone call was placed to 814-533-1675. This telephone number is the number provided in the informal complaint and matched the internet search results.

transportation. Officer Ebersole then identified himself as a PUC Motor Carrier Enforcement Officer and told Respondent of the informal complaint regarding Respondent providing services while uncertified as a household carrier by the PUC. Officer Ebersole advised Respondent to cease and desist household goods moving operations until obtaining the appropriate authority from the PUC and provided Respondent with the appropriate steps to become compliant with PUC regulations concerning carrier classification.⁶

16. On or about January 13, 2025,⁷ the PUC's Motor Carrier Enforcement Division mailed Respondent a Warning Letter detailing Officer Ebersole's investigation and subsequent determination that Respondent did not possess a certificate of public convenience issued by the PUC. The Warning Letter directed Respondent to cease and desist from further violations of the Public Utility Code at 66 Pa.C.S. §§ 101 *et. seq.* and the regulations of the PUC at 52 Pa. Code §§ 1.1 *et. seq.* The Warning Letter detailed that continued operations may subject Respondent to a \$5,000 penalty for the first violation and increased consequences for additional violations. Respondent was advised to remove all advertising regarding intrastate services until obtaining PUC authority. The Warning Letter included instructions for Respondent to file an application with the PUC to obtain a certificate of public convenience to lawfully transport household goods and/or property between points in Pennsylvania for compensation.

⁶ Officer Ebersole provided Respondent compliance information via the following email address: truckmusclepa@gmail.com.

⁷ The Warning Letter was incorrectly dated as January 13, 2024.

17. On or about January 13, 2025, the case docketed at Case No. Bp8#3052303 was closed.

18. On or about January 24, 2025, Officer Ebersole collected Respondent's business card from Sheetz at 208 Haynes Street, Johnstown, PA. The business card was placed in an area of the convenience store dedicated to local business advertising. A true and correct copy of Respondent's business card is attached as I&E Exhibit 2.

19. On or about February 12, 2025, Officer Ebersole initiated a follow-up complaint.⁸ Officer Ebersole conducted a general utility search for any motor carrier known as "Truck and Muscle" or "Truck & Muscle" on the Commission's open-source website yielding no results for a certified business under such names.

20. On or about February 12, 2025, Officer Ebersole placed a telephone call to Respondent.⁹ The call was answered by a male voice stating, "Truck and Muscle Moving Company." Officer Ebersole, upon immediately identifying himself, requested to speak with Derrian. The call recipient identified themselves as Derrian, who declared, unprompted, that Respondent did not receive the Warning Letter. Officer Ebersole advised he would resend the Warning Letter. Officer Ebersole inquired if Respondent had applied for or received a certificate of public convenience, to which Respondent stated their full intention to apply for authority from the PUC. Respondent confirmed receipt of Officer Ebersole's email, sent December 11, 2024, containing application instructions. Officer Ebersole informed Respondent that Respondent's business card had

⁸ Docketed at Case No. Bp8#3053082.

⁹ The telephone call was placed to the number listed on the business card, which is the same number used to contact Respondent on or about December 12, 2024.

been retrieved from Sheetz. Officer Ebersole issued a verbal warning that any further advertising, even if residual, may lead to a complaint instituted for the purpose of levying civil penalties and advised Respondent to not further engage as a motor carrier of household goods until obtaining the proper authority from the PUC. Officer Ebersole confirmed Respondent's email address and resent the Warning Letter.

21. On or about February 27, 2025, the case docketed at Case No. Bp8#3053082 was closed.

22. On or about March 24, 2025, Officer Ebersole requested the instant case be opened.¹⁰

23. On or about May 9, 2025, PUC Motor Carrier Enforcement Officer Jeremy Smith was assigned the instant case.¹¹ Officer Smith conducted an entity search on the Pennsylvania Department of State website finding Respondent registered as a domestic limited liability company on March 20, 2019. Officer Smith further conducted a general utility search for Respondent on the Commission's open-source website yielding no results.

24. On or about May 9, 2025, Officer Smith placed a telephone call to Respondent utilizing a PUC Tracfone not assigned to an enforcement officer.¹² A male answered the call stating, "Truck and Muscle Moving." Officer Smith inquired about scheduling a move on May 14, 2025, from Johnstown, Cambria County, to Friedens, Somerset County. The male provided a rate of \$175 per hour for a minimum two hours

¹⁰ Docketed at Case No. Bp8#3054215.

¹¹ Officer Aaron Ebersole is no longer employed by the PUC.

¹² The telephone number utilized was the number from Respondent's business card and prior docketed cases.

plus a \$50 deposit required prior to scheduling. The deposit was not paid as the male needed to confirm date availability at a later call. The male did not request Officer Smith's contact information to return the call.

25. Officer Smith received no return call from Respondent, and the attempted household goods service request was not completed.

26. On or about May 15, 2025, Officer Smith placed a telephone call to Respondent utilizing his assigned PUC officer phone.¹³ Officer Smith received Respondent's voicemail identifying the number as "Truck and Muscle Moving Company." Officer Smith left a voicemail message identifying himself as a PUC Motor Carrier Enforcement Officer and detailed his assignment to the complaint investigating Respondent for continued operation without the required PUC household goods authority. Officer Smith indicated that Respondent was sent the Warning Letter on January 13, 2025, and previously provided additional information for obtaining PUC authority. Officer Smith informed Respondent of his discovery of Respondent's continued offering of services without PUC authority and indicated that a fine may be sent to Respondent based upon those findings. Officer Smith provided information relating to the significant fines for Respondent's violations and advised Respondent of potential misdemeanor criminal charges for continued operation without PUC authority. Officer Smith advised the importance of completing the application to obtain the required PUC household goods authority.

¹³ The telephone number utilized was the same as previously used.

27. Respondent does not possess, nor has it ever been issued, a certificate of public convenience, permit, or license by the Commission authorizing such transportation of household property between points within the Commonwealth.

III. VIOLATIONS

COUNT 1

28. All allegations in Paragraphs 1 through 27 are incorporated as if fully set forth herein.

29. 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), 66 Pa.C.S. § 3310(a), “*shall* be ordered to pay an administrative penalty as prescribed in subsection (c).” 66 Pa.C.S. § 3310(b) (emphasis added).

30. 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.

31. Section 3310(c) of the Public Utility Code requires that “[t]he amount of the administrative penalty under subsection (b) shall be \$5,000 for a first violation and \$10,000 for a second or subsequent violation.” 66 Pa.C.S. § 3310(c). As such, I&E’s

requested administrative penalty is \$5,000 for this violation, as this is Respondent's first violation under Section 3310 of the Public Utility Code, 66 Pa.C.S. § 3310, which was amended and made effective on February 20, 2018.

WHEREFORE, for all the foregoing reasons, the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission respectfully requests that the Commission find the Respondent in violation of the only count as set forth herein and that Respondent be assessed the statutorily mandated administrative penalty of Five Thousand Dollars (\$5,000). Should Respondent fail to pay the statutorily mandated administrative penalty of Five Thousand Dollars (\$5,000) upon Order of the Commission, the Bureau of Investigation and Enforcement requests that this matter be referred to the Pennsylvania Office of Attorney General for appropriate action.

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

Date: March 6, 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	:	

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: March 6, 2026

Jeremy Smith
Motor Carrier Enforcement Officer
Bureau of Investigation and Enforcement

I&E Exhibit 1

truck and muscle moving compai x +

https://www.bing.com/search?q=truck+and+muscle+moving+company+johnstown+pa&q=UT&pq=truck+and+muscle+...

CUPS DGS Vender List Motor Carrier | PA P... FMCSA Login Pennsylvania Code ... CVSA - Commercial... CVSA Bulletins Utility Authority Sea... Title 66 - PA Genera...

Microsoft Bing truck and muscle moving company johnstown pa Sign in 200

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Facebook
https://www.facebook.com/Truckmusclepa
Truck & Muscle Moving Company - PA - Facebook
Truck & Muscle Moving Company - PA. 367 likes. We are a growing moving company currently serving the Cambria County(PA) and surrounding area.
5/5 ★★★★★ (14) Likes: 367
Followers: 416

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Consumer Voice
https://www.consumervoice.org/top-10/moving-company
10 Best Moving Companies | Affordable Moving Services
Sponsored Hire a Trusted Mover Recommended by Expert. Over 100,000 Customers Served. Find a Fully-Licensed **Moving Companies** that You Can Trust & Get Quick, Accurate Pricing.
ConsumerVoice.org Picks · Compare Top 10 Brands · Reviewed By 1,000s · Trusted Reviews
Types: Long-Distance, Residential, Commercial, Local

Type here to search

7:50 AM
12/12/2024

The screenshot shows a Google search result for 'Truck & Muscle Moving Company- Pa'. The search bar at the top contains the text 'truck and muscle johnstown'. The search results show a 5.0 star rating with 81 reviews. A review from Kara, a Local Guide with 52 reviews and 2 photos, is highlighted. The review text reads: 'Amazing service!! They were incredibly fast, right on time, and took amazing care of all of our items! We moved three whole bedrooms, our living room, and dining room from an hour away and they only took about three and a half hours total I was blown away! They were also extremely personable and respectful'. The review is dated '2 weeks ago' and is marked as 'NEW'. The company's name 'Truck & Muscle Moving Company- Pa' is visible at the top of the search result. The background shows a Windows taskbar with the search bar and various application icons. The system tray shows the time as 1:01 PM on 12/10/2024.

I&E Exhibit 2

Truck & Muscle Moving Company

Like us on Facebook & Follow us on Instagram

Truck & Muscle Moving Company

For Your Professional
Moving Experience Call

(814)533-1675

GOT AT SHEETZ

Truckmusclepa@gmail.com

HAYNES ST

1/24/25



Commercial & Residential

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

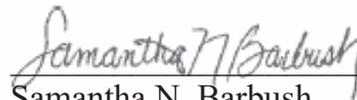
Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3058403
	:	
Truck & Muscle Moving LLC	:	
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Amended Formal Complaint**, dated March 6, 2026, upon the party, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by party):

Service via First-Class Mail and Electronic Mail

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



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

Dated: March 6, 2026