



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

April 28, 2026

Via Electronic Filing

Matthew L. Homsher, 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.
Made EZ Moving LLC
Docket No. C-2026-
I&E Formal Complaint

Dear Secretary Homsher:

Enclosed for electronic filing please find the Formal Complaint of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission in the above-referenced matter.

Copies are being served on the parties of record in accordance with the attached 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'.

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

SNB/nb
Enclosures

cc: Per Certificate of Service
Stephanie M. Wimer, Deputy Chief Prosecutor, I&E-Enf (via email – stwimer@pa.gov)
Brian Mehus, Chief, Motor Carrier (via email – bmehus@pa.gov)

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

Your payment is an admission that you committed the alleged violations and an agreement to cease and desist from continuing further violations. Upon receipt of your payment, the Complaint proceeding shall be closed.

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-2026-
	:	
Made EZ Moving LLC	:	
Respondent	:	

FORMAL COMPLAINT

NOW COMES the Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement (“I&E”), by its prosecuting attorney, pursuant to Section 701 of the Public Utility Code, 66 Pa.C.S. § 701, and files this Formal Complaint (“Complaint”) against Made EZ Moving LLC (“Respondent”) alleging violations of the Public Utility Code and Pennsylvania Code. In support of its Formal 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 the 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 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 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) of the Code 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 Code, 66 Pa.C.S. § 501(c), which requires a public utility to comply with Commission regulations and orders.

II. BACKGROUND

9. Respondent is Made EZ Moving LLC with a principal place of business of 3839 Delco Road, Pittsburgh, PA 15227.

10. Respondent has a mailing address of 401 East James Street, Munhall, PA 15120.

11. Respondent is a registered domestic limited liability company in the Commonwealth of Pennsylvania since June 9, 2020.

12. Respondent is owned and operated by Michael Shaun Thomas Coates.

13. Respondent has been the subject of prior I&E investigations.

A. I&E Previously Warned Respondent to Cease Offering Unauthorized Transportation of Household Goods

14. On or about January 17, 2022, the PUC received an informal complaint regarding Respondent lacking authority from the PUC to conduct business.

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.

15. On or about July 15, 2022, I&E Motor Carrier Enforcement Officer Christopher Urey was assigned the informal complaint.

16. After making several unsuccessful attempts to contact Respondent by telephone between December 9, 2022, and January 30, 2023,² Officer Urey investigated Respondent's website address provided in the informal complaint and discovered the site was active due to recent postings.³ Additionally, Officer Urey searched PUC records for any motor carrier known as "Made EZ Moving," yielding no results for a certified business under such name.

17. On or about January 30, 2023, Officer Urey received a telephone call from a woman, Erin Graham, claiming to be a "friend of the company." Officer Urey explained PUC regulations, the importance of household goods movers receiving PUC authority, and the penalties for continued operation without authority. Officer Urey provided instructions for the application of authority. Ms. Graham indicated she would relay the information to Respondent.

18. On or about February 9, 2023, I&E's Motor Carrier Enforcement Division mailed Respondent a Warning Letter detailing Officer Urey'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. The Warning Letter included instructions for Respondent to file an application with the PUC to

² The telephone calls were placed to 412-770-4096, the telephone number provided in the informal complaint.

³ Respondent's website, www.madeezmovingpittsburgh.com, included Respondent's address, at 3839 Delco Road, Pittsburgh, PA 15227, and telephone number, both which matched the information provided in the informal complaint.

obtain a certificate of public convenience to lawfully transport household goods and/or property between points in Pennsylvania for compensation.

B. Instant Incident of Unauthorized Transportation

19. On or about February 2, 2024, the PUC received an informal complaint regarding Respondent lacking authority from the PUC to conduct business.

20. On or about July 10, 2025, I&E Motor Carrier Enforcement Officer Joseph Zalar placed a telephone call to Respondent. Officer Zalar spoke with “Shawn” and requested a full-service move, including the transportation of household goods, on August 1, 2025, from 125 Herron Avenue, Cheswick, Allegheny County, to 101 Locust Hill Road, Apartment 2, Cheswick, Allegheny County, under the pseudonym Dylan Marshall.

21. On or about July 11, 2025, Respondent confirmed the move via email by providing a written estimate, quoting a price of \$375-525. The email requested a \$75 deposit.⁴

22. On August 1, 2025, I&E Motor Carrier Enforcement Officers Mia Fuller and Andrew Rosenberger, I&E Motor Carrier Enforcement Supervisor Ryan Balestra, and Harmar Township Police Officer Otto Gaal, traveled to 125 Herron Avenue, Cheswick, Allegheny County. Respondent arrived in a rented U-Haul truck, whereupon the I&E Officers informed Respondent of the informal complaint and lack of authority. Officer Fuller completed a Driver/Vehicle Compliance Report (“DVCR”) and provided Respondent with a copy detailing a violation of Section 3310(a) of the Code, 66 Pa.C.S. § 3310(a), for operating as a motor carrier without a certificate of public convenience issued by the Commission.⁵

⁴ Respondent’s contact information provided on the written estimate included an address at 401 East James Street, Pittsburgh, PA 15120, a telephone number at 412-770-4096, and an email at info@madeezmovingpittsburgh.com.

⁵ To complete the DVCR, Respondent provided multiple addresses, which included Made EZ Moving LLC’s address at 3839 Delco Road, Pittsburgh, PA 15227, and Mr. Coates’s address at 401 East James Street, Pittsburgh, PA 15120. Additionally, Respondent provided the U-Haul Equipment Contract listing its address at 401 East James Street, Homestead, PA 15120.

23. 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. VIOLATION

COUNT 1

24. All allegations in paragraphs 1-23 are incorporated as if fully set forth herein.

25. 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).

26. 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 and offering the transport of household goods between points within the Commonwealth for compensation.

27. 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 Five Thousand Dollars (\$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 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: April 28, 2026

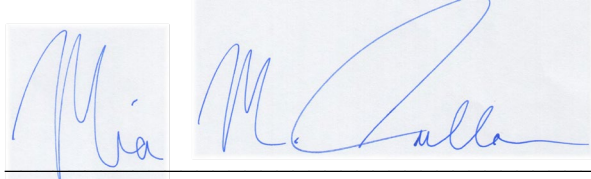
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Complainant	:	
	:	
v.	:	Docket No. C-2026-
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Made EZ Moving LLC	:	
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VERIFICATION

I, Mia Fuller, 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: April 28, 2026



Mia Fuller
Motor Carrier Enforcement Officer
Bureau of Investigation and Enforcement

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
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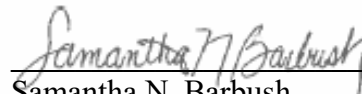
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Formal Complaint**, dated April 28, 2026, upon the party, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Service by Certified Mail, Return Receipt Requested

Made EZ Moving LLC
Attn. Michael Shaun Thomas Coates
3839 Delco Road
Pittsburgh, PA 15227

Made EZ Moving LLC
Attn. Michael Shaun Thomas Coates
401 East James Street
Munhall, PA 15120



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

Dated: April 28, 2026