



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

May 7, 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.
International Van Lines Inc.
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/ac
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-
	:	
International Van Lines Inc.	:	
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 International Van Lines Inc. (“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 is International Van Lines Inc. with a principal place of business and mailing address of 3957 NW 126th Avenue, Coral Springs, FL 33065.

5. Respondent operates as 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).

6. 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.

7. 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.

8. 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)(1) 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.

9. Section 3310(c)(2) of the Code, 66 Pa.C.S. § 3310(c)(2), further provides that a person or corporation in violation of Section 3310(b) may also be subject to registration suspension and the confiscation and impoundment of vehicles.

10. 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

11. On or about May 1, 2025, the PUC received an informal complaint regarding Respondent lacking authority from the PUC to conduct business. The informal complaint alleged that Respondent performed an intrastate move on March 18, 2025, from 156 Oakview Drive, Cranberry Township, Butler County, to Downingtown, Chester County.

12. On or about August 11, 2025, I&E Motor Carrier Enforcement Officer Joseph Zalar was assigned the informal complaint, whereupon Officer Zalar confirmed via the PUC's website that Respondent did not have PUC authority.

13. On or about August 20, 2025, Officer Zalar contacted Respondent via telephone and spoke with Daisja Brinson, Respondent's Compliance Officer. Ms. Brinson acknowledged the March 18, 2025 move, referenced at paragraph 11, above, and confirmed that Respondent lacked PUC authority. Ms. Brinson claimed that the March 18, 2025 move's destination was originally planned for Connecticut but changed last minute to Chester County, Pennsylvania, and, due to the customer's distress, Respondent completed the intrastate move. Ms. Brinson further expressed concerns over Respondent's lack of physical address in Pennsylvania but

claimed that Respondent was in the process of finding a local Pennsylvania agent to apply for PUC authority.

14. On August 22, 2025, Ms. Brinson emailed Officer Zalar following up on their August 20, 2025 conversation, referenced at paragraph 13, above, to which Officer Zalar confirmed that Respondent did not need a physical address in Pennsylvania to obtain PUC authority. Officer Zalar provided Respondent links to the PUC's website and applications for authority.

15. On or about September 10, 2025, Officer Zalar contacted Ms. Brinson, and she stated that Respondent was still working on its application for authority and seeking a Pennsylvania address. Officer Zalar clarified that Respondent did not need a Pennsylvania address to apply for PUC authority.

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

III. VIOLATION

COUNT 1

17. All allegations in paragraphs 1-16 are incorporated as if fully set forth herein.

18. 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).

19. 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 transported household goods between points within the Commonwealth for compensation.

20. Section 3310(c)(1) 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)(1) (emphasis added). 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.

21. In addition to the requested administrative penalty above, a person or corporation under 66 Pa.C.S. § 3310(b) may also be subject to the following:

- (i) Suspension of registration under 75 Pa.C.S. § 1375 (relating to suspension of registration of unapproved carriers).
- (ii) Confiscation and impoundment of vehicle. A sheriff, upon an order issued by the court and having jurisdiction over the property, is empowered to confiscate and impound vehicles which have been used to provide common carrier by motor vehicle service or contract carrier by motor vehicle service in violation of subsection (b) or commission regulations. The process for the disposition of impounded vehicles shall be as set forth under 75 Pa.C.S. § 6310 (relating to disposition of impounded vehicles, combinations, and loads).

66 Pa.C.S. § 3310(c)(2).

22. I&E is not requesting suspension of registration, pursuant to 66 Pa.C.S. § 3310(c)(2)(i), or confiscation and impoundment of Respondent's vehicles used to provide common carrier or contract carrier by motor vehicle service without Commission approval, pursuant to 66 Pa.C.S. § 3310(c)(2)(ii), as I&E has concluded that this is Respondent's first violation under Section 3310 of the Public Utility Code, 66 Pa.C.S. § 3310.

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: May 7, 2026


**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Complainant	:	
	:	
v.	:	Docket No. C-2026-
	:	
International Van Lines Inc.	:	
Respondent	:	

VERIFICATION

I, Joseph Zalar, 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: May 7, 2026



Joseph Zalar
Motor Carrier Enforcement Officer
Bureau of Investigation and Enforcement

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

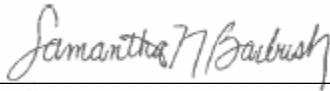
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v.	:	Docket No. C-2026-
	:	
International Van Lines Inc.	:	
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Formal Complaint**, dated May 7, 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

International Van Lines Inc.
3957 NW 126th Avenue
Coral Springs, FL 33065



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