

NOTICE OF COMPLAINT

- A. You must file an Answer within twenty (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 for this Complaint and Notice, 52 Pa. Code §1.56(a). An Answer is a written explanation of circumstances wished to be considered in determining the outcome. The Answer shall raise all factual and legal arguments that you wish to claim in your defense and must include the reference number of this Complaint. Your Answer must be verified, and the original shall be mailed 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 and Resources tab on the homepage. If your Answer exceeds 250 pages, you must also 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, a copy should either be

Mailed to:

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 3W
Harrisburg, PA 17120

Or, **E-mailed to:**

RA-PCCmplntResp@pa.gov

- B. If you fail to answer this Complaint within twenty (20) days, the Bureau of Investigation and Enforcement will request that the Commission issue a Secretarial Letter imposing a penalty. The penalty could include a civil penalty, the suspension or revocation of your operating authority, or other such remedy.
- C. You may elect not to contest this Complaint by paying the civil penalty requested in this Complaint by certified check or money order. Payment must be made to "**Commonwealth of Pennsylvania**" and should be forwarded to:
- Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
- D. Your payment is an admission that you committed the alleged violation and an agreement to cease and desist from further violations. Upon receipt of your payment, the Complaint proceeding shall be closed.
- E. If you file an Answer, which admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request that the Commission issue a Secretarial Letter imposing a civil penalty and/or other such remedy
- F. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge (ALJ) for hearing and decision. The ALJ is not bound by the requested civil penalty.
- G. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code §1.21.
- H. 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 :

v. :

DOCKET NO. C-2026-3057073

KEITH M. CHITWOOD :
T/A MIKE MOVES PITTSBURGH :
606 JAMES STREET :
TURTLE CREEK, PA 15145 :

COMPLAINT

The Pennsylvania Public Utility Commission (Commission or “PUC”) is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth. The Commission has delegated its authority to initiate proceedings which are prosecutory in nature to the Bureau of Investigation and Enforcement and other bureaus with enforcement responsibilities. Pursuant to that delegated authority and Section 701 of the Public Utility Code, the Bureau of Investigation and Enforcement- Motor Carrier Enforcement Division hereby represents as follows:

1. That KEITH M. CHITWOOD, T/A MIKE MOVES PITTSBURGH, Respondent, maintains its principal place of business at 606 James Street, Turtle Creek, PA 15145.
2. That on February 23, 2018, by Commission Secretarial Letter, Respondent was issued a certificate of public convenience by this Commission authorizing transportation, as a common carrier, by motor vehicle, household goods in use between points in Pennsylvania at Application Docket No. A-2017-2633050, PUC Utility Code 8917684.
3. That on or about September 2, 2025, PUC Motor Carrier Enforcement Officer Joseph Zalar was assigned to investigate an informal complaint regarding Respondent’s household goods move, brokered through iMoving.com, that had taken place on December 9, 2024. The informal complaint alleged damaged items, including porcelain pieces and wood furniture. On or about January 15, 2025, complainant submitted a claim for loss and damage with iMoving and on or about August 14, 2025, complainant received a \$75 settlement offer from iMoving, which was not accepted by complainant.
4. That or about September 8, 2025, Officer Zalar contacted iMoving customer service to request additional information on the December 9, 2024, move. The customer service representative stated that iMoving is not a broker, but that it obtains moving jobs for local moving companies. iMoving did not provide Officer Zalar any requested information on the December 9, 2024, move.
5. That on or about September 8, 2025, Officer Zalar spoke with Respondent to request additional information on the December 9, 2024, move. Respondent stated that iMoving acts as a broker by connecting moving companies with customers, including the December 9, 2024, move. Respondent explained that iMoving charges the customers and provide their moving companies with a portion of the payment. Respondent provided Officer Zalar a copy of its Platform ?Terms of Use with iMoving.

6. That during Officer Zalar's investigation, the following violations were found:
- a. Respondent failed to furnish the shipper of the December 9, 2024, with "Information for Shippers" when moving services were requested, violating 52 Pa. Code §31.121. The penalty for this violation is \$250.
 - b. Respondent failed to furnish the shipper of the December 9, 2024, move with an estimated cost of services prior to the household goods move, violating 52 Pa. Code §31.122. The penalty for this violation is \$250.
 - c. Respondent failed to affirm or deny responsibility for claims in a reasonable time after proof of loss statements have been completed and communicated to the carrier or its representative, as the damage claim stemming from the December 9, 2024, move was filed on or about January 15, 2025, and a settlement offer was not made until on or about August 14, 2025, violating 52 Pa. Code §32.16(5). The penalty for this violation is \$250.

WHEREFORE, the Bureau of Investigation and Enforcement hereby requests that the Commission impose a civil penalty of seven hundred fifty dollars (\$750.00) upon KEITH M.CHITWOOD, T/A MIKE MOVES PITTSBURGH, for the violations described in this Complaint and order such other remedy as the Commission may deem to be appropriate. If payment of the civil penalty is not made, the Bureau of Investigation and Enforcement requests that the Bureau of Administration, Financial & Assessments Office, be directed to refer the matter to the Pennsylvania Office of Attorney General for collection of the civil penalty

Respectfully submitted,



Brian B. Mehus, Chief
Motor Carrier Enforcement
Bureau of Investigation and Enforcement
400 North Street, 2nd Floor
Harrisburg, PA 17120

VERIFICATION

I, Brian B. Mehus, 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 will be able to prove 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: 2 September 2026



Brian B. Mehus, Chief
Motor Carrier Enforcement
Bureau of Investigation and Enforcement