



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

June 22, 2015

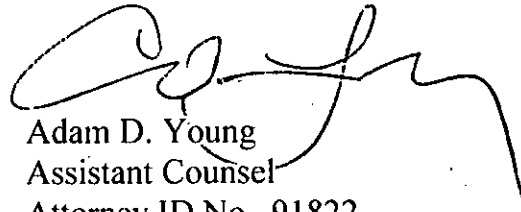
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission, Bureau of Transportation and  
Safety v. Mickey Jadallah d/b/a ABC Moving Service, LLC  
C-2015-2437081

Dear Ms. Chiavetta:

Enclosed for filing is the Answer to New Matter of the Bureau of Transportation  
and Safety of the Pennsylvania Public Utility Commission in the above-referenced case.  
Copies have been served on the parties of record in accordance with the Certificate of  
Service.

Sincerely,



Adam D. Young  
Assistant Counsel  
Attorney ID No. 91822  
Pennsylvania Public Utility Commission

Enclosures

cc: As per Certificate of Service

RECEIVED  
2015 JUN 22 PM 12:08  
PA PUC  
SECRETARY'S BUREAU

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED  
2015 JUN 22 PM 12: 09  
PA PUC  
SECRETARY'S BUREAU

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION, BUREAU OF  
TRANSPORTATION AND SAFETY

V.

DOCKET NO: C-2015-2437081

MICKEY JADALLAH d/b/a ABC MOVING  
SERVICE, LLC  
2438 S. 5<sup>th</sup> STREET REAR  
ALLENTOWN, PA 18103

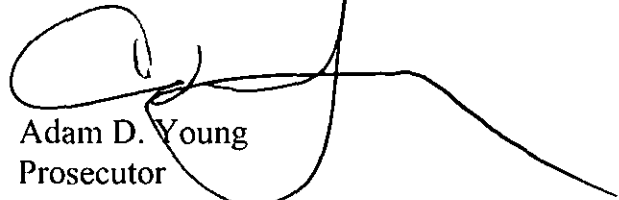
ANSWER TO NEW MATTER

Now comes, Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement ("I&E"), and, pursuant to 52 Pa. Code § 5.63, files this Answer to New Matter. I&E hereby represents as follows:

4. Denied.
5. Denied.
6. Denied. By way of further answer, Respondent (defendant) knows he does not possess valid authority from the Public Utility Commission (PUC) due to the fact that he has previously applied for and was denied authority by the PUC to operate as a household goods carrier.

WHEREFORE, the I&E hereby requests that the Commission impose a civil penalty upon Respondent in the sum of one-thousand dollars (\$1000.00) for the illegal activity described in the Complaint and order such other remedy as the Commission may deem to be appropriate.

Respectfully submitted,



Adam D. Young  
Prosecutor  
Attorney I.D. No. 91822

Counsel for the Pennsylvania  
Public Utility Commission  
Bureau of Investigation and Enforcement

P.O. Box 3265  
Harrisburg, PA 17105  
(717) 787-5000

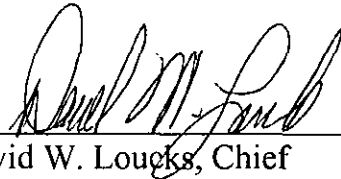
Dated: June 22, 2015

RECEIVED  
2015 JUN 22 PM 12: 09  
PA PUC  
SECRETARY'S BUREAU

VERIFICATION

I, David W. Loucks, Chief of the Motor Carrier Enforcement Division of the Bureau of Investigation and Enforcement, 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 the Bureau 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: 6-22-15



David W. Loucks, Chief  
Motor Carrier Enforcement Division  
Bureau of Investigation and Enforcement

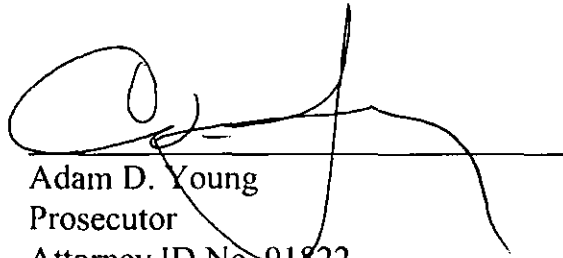
RECEIVED  
2015 JUN 22 PM 12: 09  
PA PUC  
SECRETARY'S BUREAU

# CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing document, Answer to New Matter, upon the persons listed and in the manner indicated below:

**Service by First Class Mail:**

Bohdan J. Zelechiwsky, Esq.  
527 Hamilton Street, Lower Level  
Allentown, PA 18101



Adam D. Young  
Prosecutor  
Attorney ID No. 91822  
Pennsylvania Public Utility Commission

P.O. Box 3265  
Harrisburg, PA 17105-3265  
(717) 787-5000

Dated: June 22, 2015

RECEIVED  
2015 JUN 22 PM 12:09  
PA PUC  
SECRETARY'S BUREAU