

**Date: 5/15/2025**

**Docket No. A-2025-3054959**

**FLEX STORAGE INC  
1065 SW 8TH ST PMB 5012  
MIAMI FL 33130**

**Explanation: Response to data request to process application.**



I, Yaniv Rosenberg, 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 to be able to prove the same at a 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).

Yaniv Rosenberg  
Printed Name

  
EVP, North America

05/14/25  
Date



# Driver Safety Training Manual & Acknowledgement

## Introduction

Safety is a top priority at Flex Moving & Storage. As a driver representing our moving company, you play a critical role in ensuring the safety of yourself, your team, our customers, and their belongings. This manual outlines essential safety practices, vehicle maintenance protocols, and safe driving techniques to minimize risks and maintain a high standard of safety during every job.

## General Safety Guidelines

### Pre-Trip Inspection:

Before starting any job, it is essential to conduct a thorough pre-trip inspection to ensure that your vehicle and equipment are in safe operating condition. This practice helps prevent breakdowns, ensures compliance with safety regulations, and reduces the risk of accidents on the road.

### Steps for a Comprehensive Pre-Trip Inspection:

1. **Exterior Vehicle Check:** Walk around the vehicle to inspect the overall condition. Look for any visible damage, leaks, or obstructions around the vehicle.
2. **Tires and Wheels:** Check tire pressure, tread depth, and look for signs of wear or damage. Ensure all lug nuts are securely fastened.  
**Lights and Signals:** Test headlights, brake lights, turn signals, hazard lights, and reverse lights to ensure they are functioning properly.
3. **Fluid Levels:** Check engine oil, coolant, brake fluid, windshield washer fluid, and transmission fluid. Top off any low fluids as needed.
4. **Brakes:** Test the brakes for responsiveness and listen for any unusual sounds when applying pressure.
5. **Mirrors and Windows:** Ensure all mirrors are clean, properly positioned, and free from cracks. Windows should be clean and fully operational.
6. **Trailer and Towing Equipment:** Inspect the hitch, chains, electrical connections, and safety devices to ensure they are secure and in good working order.
7. **Interior Check:** Verify that all dashboard warning lights turn off after ignition. Check seat belts, horn, wipers, and climate controls.
8. **Emergency Equipment:** Ensure that safety equipment such as fire extinguishers, first aid kits, reflective triangles, and spare tire tools are present and in good condition.
9. **Load Securement:** Confirm that any cargo or moving equipment is properly secured to prevent shifting during transit.

## Safe Driving Practices

- Wear appropriate safety gear, including non-slip footwear and gloves, as needed.
- Stay hydrated and well-rested to ensure alertness behind the wheel.
- Obey all traffic laws and speed limits.
- Avoid distracted driving: No cell phone use while the vehicle is in motion.
- Use seat belts at all times.
- Maintain a safe following distance from other vehicles.
- Adjust your driving to weather conditions, such as rain, fog, or ice.

## Load Securement

- Properly distribute and secure cargo to prevent shifting during transit.
- Use straps, ropes, or other securement devices as needed.
- Double-check all fastenings before departure.

## Customer Interaction and Safety

- Always greet customers professionally and explain the moving process before starting.
- Be mindful of safety when loading and unloading, keeping pathways clear and free from hazards.
- Communicate clearly with team members to coordinate movements and avoid injuries.

## Emergency Procedures

- In the event of an accident or breakdown, remain calm and follow the emergency protocol.
- Contact your supervisor immediately to report the situation.
- Use hazard lights and safety cones to alert other drivers.

Following these safety protocols helps ensure that every move is completed without incident, protecting both you and our customers. Always prioritize safety, follow company guidelines, and communicate any concerns to management. Needs to be more robust with detailed training explanations under each bullet

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Employee Name

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Employee Signature

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Date



## Driver Hiring & Employment Policy – Flex Storage Inc.

### Purpose & Regulatory Reference

This policy has been developed to comply with the requirements of the Pennsylvania Public Utility Commission (PUC), specifically:

- **52 Pa. Code § 37.204:** Driver qualifications and compliance.
- **52 Pa. Code § 31.134:** Criminal background and history review.
- **49 CFR § 391.25:** Annual driver record (MVR) review and documentation.

This document outlines the standard procedures used by Flex Storage Inc. to hire drivers, maintain accurate records, and ensure compliance with all state and federal regulatory requirements. The goal is to ensure a qualified, professional, and safety-conscious driver workforce.

### **1. Driver Staffing Model**

Flex Storage will utilize a flexible number of drivers based on regional demand. Initially, 1–3 drivers will be hired to service the designated territory, with adjustments made as operations scale.

### **2. Hiring Standards**

All drivers must meet the following minimum criteria:

- Valid Commercial Driver’s License (CDL) where applicable.
- Minimum 2 years of professional driving experience.
- Clean driving record (no major violations in the last 5 years).
- Ability to pass a DOT physical exam, if required.
- Strong customer service and communication skills.

### **Interview Process:**

- **Step 1:** Phone screen for basic qualifications and availability.
- **Step 2:** In-person or video interview evaluating experience, safety awareness, and professionalism.

### **Sample Interview Topics:**

- Customer service in challenging situations
- Safe loading/unloading techniques
- Pre-shift vehicle safety checks
- Violation/accident history and lessons learned



### **3. Criminal Background Checks**

All candidates must consent to a criminal background check, performed via Checkr. The screening includes:

- National criminal database
- Sex offender registry
- Identity and employment verification
- Review of relevant convictions (e.g., theft, assault, DUI)

If a record is flagged, Flex Storage's leadership team conducts a structured review using a decision matrix. If the charge may impact job performance or safety, the adverse action process is initiated in accordance with FCRA requirements.

### **4. Motor Vehicle Record (MVR) Checks**

- Initial MVR check is required for all driving positions.
- MVRs are reviewed using services such as Embark Driver License Monitoring.
- Evaluations consider traffic violations, suspensions, accidents, and license status.
- Disqualifying histories result in removal from consideration.

#### **Annual Review Requirements:**

- Annual MVR checks are performed for all active drivers.
- Each review includes documentation of:
  - MVR copy
  - Signed/dated review summary
  - Notes on any corrective actions taken

All records are retained for at least 3 years and stored securely for inspection at Flex Storage HQ.

### **5. Driver Training Program**

Flex Storage provides new hires and current drivers with comprehensive training:

- Safe loading, securing, and unloading
- Customer interaction best practices
- Regulatory compliance and company expectations
- Maneuvering trailers
- Required review and acknowledgment of our Driver Safety and Dash Cam Policies



## **6. Alcohol and Drug Policy**

Flex Storage maintains a zero-tolerance policy:

- Pre-employment drug screening is mandatory
- Random drug/alcohol testing throughout employment
- Immediate removal from duty if under the influence
- Support is available for employees seeking substance abuse assistance

## **7. Policy Linkage**

This employment policy is linked with the following operating documents, which all drivers must acknowledge:

- **Dash Cam Standard Operating Procedure**
- **Vehicle Safety and Driver Accountability Policy**

## **8. Complaint Procedure**

All complaints regarding hiring, employment, or safety policy enforcement should be submitted to:

**Javier Walden**

Vice President of Operations

Flex Storage Inc.

[Support@Flex.Storage](mailto:Support@Flex.Storage)

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## **Policy Review**

This policy will be reviewed periodically to remain in compliance with evolving regulatory requirements and operational needs. Updates may be issued at the discretion of company leadership.



**Acknowledgment & Signature**

I, \_\_\_\_\_, have read and understand the Flex Storage Inc. Driver Hiring & Employment Policy. I agree to comply with all outlined requirements and acknowledge that violation of these standards may result in disciplinary action, up to and including termination.

Employee Name (Printed)

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Employee Signature

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Date

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Javier Walden  
Vice President of Operations  
Date: \_\_\_\_\_



Flex Storage Inc.  
Parent Company : Flex Storage Inc.

**Balance Sheet**  
**End of Mar 2025**

| Financial Row                                                 | Amount           |
|---------------------------------------------------------------|------------------|
| <b>ASSETS</b>                                                 |                  |
| Current Assets                                                |                  |
| Bank                                                          |                  |
| 10010 - Bank of America x1618                                 | \$7,507.07       |
| 10020 - Bank of America x1647                                 | \$583,268.01     |
| 10030 - SVB Checking x3507                                    | \$22,895.20      |
| 10040 - SVB MMA x8666                                         | \$2,236.72       |
| Total Bank                                                    | \$615,907.00     |
| Accounts Receivable                                           |                  |
| 12000 - Accounts Receivable                                   | \$39,180.73      |
| 12020 - GoFlex I/C Receivable                                 | \$5,000.00       |
| Total Accounts Receivable                                     | \$44,180.73      |
| Other Current Asset                                           |                  |
| 12050 - Stripe Clearing Account                               | \$115,828.47     |
| 13050 - Prepaid Expenses                                      | \$92,031.43      |
| Total Other Current Asset                                     | \$207,859.90     |
| Total Current Assets                                          | \$867,947.63     |
| Fixed Assets                                                  |                  |
| 13999 - FA WIP                                                | \$267,123.57     |
| 14000 - Trailers                                              | \$10,199,212.35  |
| 14010 - Smart Kits                                            | \$1,121,596.22   |
| 14020 - Vehicles                                              | \$62,196.59      |
| 14050 - Other Fixed Assets                                    | \$2,273.62       |
| 15000 - Accumulated Depreciation - Trailers                   | (\$1,609,248.82) |
| 15010 - Accumulated Depreciation - Smart Kits                 | (\$187,698.24)   |
| 15020 - Accumulated Depreciation - Vehicles                   | (\$30,061.69)    |
| 15050 - Accumulated Depreciation - Other Fixed Assets         | (\$622.52)       |
| Total Fixed Assets                                            | \$9,824,771.08   |
| Other Assets                                                  |                  |
| 16050 - Security Deposit - Rent                               | \$12,710.70      |
| 16055 - Security Deposit - Velieto                            | \$1,800.00       |
| Total Other Assets                                            | \$14,510.70      |
| Total ASSETS                                                  | \$10,707,229.41  |
| Liabilities & Equity                                          |                  |
| Current Liabilities                                           |                  |
| Accounts Payable                                              |                  |
| 20000 - Accounts Payable                                      | \$1,125,206.39   |
| 20020 - GoFlex I/C Payable                                    | \$3,301,000.00   |
| Total Accounts Payable                                        | \$4,426,206.39   |
| Credit Card                                                   |                  |
| Ramp Card - Flex Storage Inc. - Ramp Card - Flex Storage Inc. | \$363,369.58     |
| Total Credit Card                                             | \$363,369.58     |
| Other Current Liability                                       |                  |
| 20200 - Accrued Liabilities                                   | \$64,000.00      |
| 20250 - Deferred Revenue                                      | \$9,143.75       |
| 20300 - Sales Taxes Payable-FL                                | \$19,872.13      |
| 20350 - Sales Tax Payable - TX                                | \$39,137.76      |
| Total Other Current Liability                                 | \$132,153.64     |
| Total Current Liabilities                                     | \$4,921,729.61   |
| Long Term Liabilities                                         |                  |
| 21000 - Capital Note                                          | \$17,719,910.00  |
| 21050 - Coromandel Capital Loan                               | \$9,633,144.43   |
| 22000 - Flex Mobile Storage LTD - Convertible Loan            | (\$862,592.99)   |
| 24020 - Intercompany Israel                                   | (\$895,000.00)   |
| Total Long Term Liabilities                                   | \$25,595,461.44  |

| <b>Financial Row</b>               | <b>Amount</b>     |
|------------------------------------|-------------------|
| Equity                             |                   |
| 31000 - Common Stock               | \$15.00           |
| 32000 - Additional Paid-in Capital | \$2,064,940.84    |
| Retained Earnings                  | (\$18,248,170.87) |
| Net Income                         | (\$3,626,746.61)  |
| Total Equity                       | (\$19,809,961.64) |
| Total Liabilities & Equity         | \$10,707,229.41   |



## Dash Cam Standard Operating Procedures

This policy sets out the position of Flex Storage Inc. on the use of on-board incident capture devices (Dash Cams) in vehicles and its effect on employees.

The primary uses of Dash Cams are to assist in the protection and safety of persons and property, prevention or detection of criminal offenses, defense of legal claims, and most importantly, driver training. It is not Flex Storage's intended purpose to use Dash Cams for monitoring the work of employees.

### PRINCIPLES.

The following principles apply:

- (A).** Dash Cams will be installed when appropriate in company vehicles, (i.e. pickups, trucks & tractors).
- (B).** Dash Cams are set up in a way that ensures that there is minimal intrusion of privacy, and that any intrusion is fully justified.
- (C).** All employees are required to review and sign the acknowledgement sheet for this policy prior to operating or entering a company vehicle. Employees may come across multiple situations and vehicles with dash cameras installed, and should be aware that an event or violation can occur at any time while in/around any piece of equipment.
- (D).** Violations will be accumulated for each individual on a one calendar year basis. Violations will not roll over from one year to the next, but data will be collected for the driver's year-to-year internal record with Flex Storage while driving a company vehicle.
- (E).** No images or information will be stored except where a relevant incident(event) has occurred. Dash Cams typically only retain up to 12 seconds of the incident(event). However, it is possible to review up to 100 hours of video if deemed necessary to determine fault in the case of a complaint, citation, or incident that did not get saved as an Event. This is an inside and outside view.
- (F).** Drivers are responsible for their actions as well as the actions or violations of any passengers in the vehicle while they are operating, therefore it is the driver's responsibility to make sure the passenger is abiding by laws as well (such as wearing a seatbelt). Violations can occur at any time while operating a company vehicle, even after hours or while not on the clock. Drivers and passengers in company vehicles must adhere to and abide by all local and federal laws at all times while operating company vehicles.
- (G).** The Dash Cam will not typically be monitored by an agent of the company at all times and the camera will usually remain in an automatic "ready to record" status. However, there is a Live

view feature on each camera. This will be used in accordance with the company's Standard Operating Procedures.

**(H).** The Dash Cam will not be accessed covertly to monitor the quality and amount of work completed by employees. However, where an incident is captured that reveals inappropriate conduct that cannot in good conscience be ignored, Flex Storage Inc. reserves the right to use corrective/disciplinary action in the business interests. This may include grievance, or disciplinary proceedings, defense or litigation of a legal claim, and/or driver training.

**(I).** When relevant, Dash Cam footage may be retained and used for future Health & Safety training, including the improvement in Safety Quality and Training of drivers. Flex Storage will acquire explicit permission given by the employee to utilize and/or publicize any photos, recordings, and information gathered before use in other applications such as training.

### EMPLOYEES

When Dash Cams are deployed, they are likely to capture pictures of employees and potentially citizens/non-employees. Dash Cam evidence may be used as part of an employee investigation where, in the reasonable belief of management, that there may have been misconduct, or a breach of Health and Safety. Where footage is used in disciplinary proceedings, it may be retained for a further period of up to five years. The employee may be permitted to see and respond to the images, in addition to the employee's right to request a copy, in which a written request should be provided within one month of the date of the incident.

Under appropriate circumstances the footage may be provided to Police (or other Competent Authority) with the intention to prosecute for criminal offenses. In defense of legal claims, or in pursuance of civil recovery, footage may also be provided to our legal representatives with the intention of providing evidence before the courts.

### NON-EMPLOYEES

Where an incident involves a third party, the relevant insurers will be informed of the details. Although the third party may be made aware that there is recorded evidence in the form of Dash Cam footage, a copy of the recorded material can only be obtained if requested by the subject themselves. Third Parties should also be aware that under appropriate circumstances the footage may be provided to Police (or other Competent Authority) with the intention to prosecute for criminal offenses. In defense of legal claims, or in pursuance of civil recovery, footage may also be provided to Riverside Contracting's legal representatives with the intention of providing evidence before the courts.

### VIOLATIONS

Below is a list of commonly triggered events and their corresponding violation levels (if any) recorded by the dash cameras installed in company vehicles.

| Level 5 Violations                   | Level 2 Violations                       |
|--------------------------------------|------------------------------------------|
| Falling Asleep                       | Failed to Keep an Out                    |
| Aggressive Repeat Offender           | Cell Phone Hands Free - Distraction      |
| Level 4 Violations                   | Other Communication Device - Distraction |
| Near Collision                       | Electronic Device - Distraction          |
| Following Distance: <1 second        | Passenger Distraction                    |
| Too Fast For Conditions              | Other Distraction                        |
| Unsafe Lane Change                   | Incomplete Stop                          |
| Failed To Stop                       | Not On Designated Roadway                |
| Ran Red Light                        | Not Scanning Roadway                     |
| Posted Speed Violation               | Lack Of Intersection Awareness           |
| Drowsy                               | Improper/Inadequate Mirror Use           |
| Aggressive                           | Driver Conduce Concern                   |
| ER (Electronic Recorder) Obstruction | No Seat Belt                             |
| Other Violation                      | Passenger Unbelted                       |
| Level 3 Violation                    | Level 1 Violations                       |
| Following Distance: <1 sec to <2 sec | Following Distance: <2 sec to <3 sec     |
| Late Response                        | Driver Smoking                           |
| Blank Stare (Fatigue)                | Following Distance: <3 sec to 4<sec      |

| Misc Violations                                                            |
|----------------------------------------------------------------------------|
| Near Collision - Unavoidable                                               |
| Possible Collision                                                         |
| Collision (Violations accumulated for follow distance, late reaction etc.) |
| Cell Phone Hands Free - Observation                                        |
| Camera Use                                                                 |

## DISCIPLINARY ACTION

Each driving violation will be accumulated on the driver's internal record with Flex Storage across a rolling calendar year. Drivers will receive disciplinary action of varying degrees based on their accumulation of violations.

### **Disciplinary action up to and including termination of employment will be taken against any employee who is involved in any of the following actions.**

1. Destroying, dismantling or unplugging the camera (device).
2. Deliberately blocking the view of the camera inside the cab or outside the cab of the vehicle. This will include clothing items, tape, sun visor, etc.
3. Exhibiting unsafe behavior that endangers the lives of other workers and the traveling public.

## ACCESS TO DASH CAM RECORDINGS

Access to retained images and information will be kept confidential within the agents of Flex Storage Inc. with appropriate security measures to safeguard against unauthorized access and use. Access is approved on an incident -by -incident basis. Once access is approved by the authorized agent of the company, recorded footage can be reviewed (not deleted or amended) by:

1. CEO

2. C-Suite Leadership
3. Executive Vice President Of Operations
4. Vice President Of Operations
5. Statutory bodies such as Police, HSE, etc.

Any other person with interest must obtain authority from the EVP or VP Of Operations to view recorded footage, providing reasons and justification. Any persons whose images are recorded have a right to view those images, and to be provided with a copy of those images upon request within one month of the event. Availability of images will be subject to the retention period. Employees making such a request should do so in writing, providing the relevant time and date of the image, so that they may be easily identifiable. The request should be made to [Support@Flex.Storage](mailto:Support@Flex.Storage)

The EVP or VP of Operations may automatically send the images or information to the employee for review without a written request being needed. In that event, the information will be sent to the employee's email on file. It is the employee's responsibility to keep the office and their employee file up to date with correct contact information.

#### COMPLAINTS

Complaints about the operation of the Dash Cam system should be addressed to Javier Walden, Vice President Of Operations, Flex Storage, Inc.

#### MONITORING AND REVIEW

This policy will be regularly reviewed for potential edits or legislative change. This policy forms part of employees' terms and conditions of employment and may be subject to change at the discretion of Flex Storage, Inc.

#### ACKNOWLEDGEMENT

I, \_\_\_\_\_, have read the Company's Dash Camera Policy and agree to abide by it. I understand violation of any of the above terms, dismantling, destroying, or altering the view of the camera inside the cab or outside the cab may result in discipline, up to and including my termination.

\_\_\_\_\_  
Employee Name (Printed)

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

## Data Request

1. In your verified statements you don't indicate the presence of any Pennsylvania-based facilities; where will local vehicles for service in Pennsylvania be stored? Will there be no local storage or office facilities?

Answer: At the time of the application we did not secure a parking location. Since then we have secured one. The address is. - 146 Conchester Highway Philadelphia, Pennsylvania 19014.

As well, we have a local office at - 100 N. 18th Street, Suite 308, Philadelphia, Pennsylvania 19103

2. Your response to Question #6 of the verified statements is inadequate – please provide a response which addresses the issue completely. Additionally, fully explain how one 2022 Dodge RAM Pickup truck is sufficient to provide Household Goods in Use service throughout Pennsylvania.

Response: We plan to use a fleet of about 4-5 vehicles, which we believe is appropriate to provide reasonable and efficient moving services throughout the territory we intend to serve in Pennsylvania. This number is based on a combination of projected demand, geographic coverage, and operational capacity. Specifically, we considered the following factors:

- Anticipated volume of moves per week based on comparable operator benchmarks and new markets we have opened in the past two years.
- Operational efficiency, with a goal of maintaining minimal wait times for customers and reliable scheduling

We believe this number of vehicles will ensure consistent service quality while maintaining cost-efficiency and responsiveness.

Vehicles Already Obtained: (As we mention In the application)

Year - 2022, Make & Model - Dodge Ram, VIN - 1C6RREJT9NN358184, Mileage - 77k

Our model works with a pickup truck and enclosed cargo trailers. In order to start operation we will only need one vehicle. We start with a very lean model in all locations we work in. Currently we operate in FL, TX, NC, TN, GA, AZ. Our model has proven successful and our lower operational cost structure would flow as a direct savings to the customers.