

REPLY OF DREW MOVES, LLC TO OPPOSITION TO PETITION FOR RECONSIDERATION OF DENIAL OF HOUSEHOLD GOODS OPERATING AUTHORITY

Daniel Hooven (“Respondent”) respectfully submits this Response to the Reply filed by Drew Moves, LLC/Andrew Zeffiro/ Andrew J. Horowitz, Esq. (“Applicant”) and states as follows:

I. RESPONDENT’S STATUS AND PURPOSE

- Respondent is not a “disgruntled former customer.” Respondent is a consumer victim with a valid civil judgment exceeding \$27,500 arising from a residential household goods move performed by Miracle Movers Pittsburgh.
- Respondent acknowledges that the judgment is legally the responsibility of Miracle Movers Pittsburgh and is not seeking to relitigate or enforce that judgment before the Commission.
- Respondent’s filings serve a proper regulatory purpose: to prevent Andrew Zeffiro from operating another household goods carrier in the same manner, through unlicensed activity, misleading advertising, sworn inconsistencies, and disregard for Commission authority.
- Respondent’s formal complaint at Docket No. C-2025-3057902 was not dismissed, but administratively reassigned to the Pittsburgh-based Bureau of Investigation and Enforcement for further evaluation. That filing concerned Drew Moves LLC operating and soliciting moving services without Commission authority and had no relation to Miracle Movers Pittsburgh. The only common factor is Mr. Zeffiro’s involvement, not duplicative conduct by the complainant.

II. ANDREW ZEFFIRO’S ROLE AND RESPONSIBILITY

- Applicant attempts to minimize Mr. Zeffiro’s role at Miracle Movers Pittsburgh. The record reflects that Mr. Zeffiro held himself out publicly as the “Managing Partner.”
- That role conveyed operational authority and responsibility, including oversight of consumer interactions and regulatory compliance. The Commission may properly consider Mr. Zeffiro’s conduct in that role when evaluating present fitness.

III. MULTIPLE SIGNED CERTIFICATIONS CONTRADICT OPERATIONS

Mr. Zeffiro personally executed multiple sworn filings certifying that neither he nor Drew Moves, LLC was engaged in unauthorized intrastate transportation and that no such transportation would occur unless and until authority was granted. This certification appears in:

- October 20, 2025 – Application for Motor Common Carrier of Household Goods in Use;
- December 11, 2025 – Application for Motor Common Carrier of Property; and
- December 12, 2025 – Petition for Reconsideration of Denial of Household Goods Authority.
- On November 17, 2025, during the pendency of these filings, a public Facebook review stated:

“I had a great customer experience with Drew Moves. His team was efficient and professional when moving my house full of heavy furniture and shelving. They took great care and all pieces arrived without damage. Very positive experience.”

Drew Moves replied, *“Thank you so much.”*

This contemporaneous admission demonstrates that Drew Moves was advertising, soliciting, and performing a residential household goods move for compensation while certifying to the Commission that no such operations were occurring.

Do you recommend Drew Moves?

Yes No

Most relevant ▾

Drew Moves · 5w
THANK YOU SO MUCH!!!
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Not yet rated (1 Review) ⓘ

Joeline Cigola 🇺🇸 recommends Drew Moves. ...
Nov 17 · 🌐

I had a great customer experience with Drew Moves. His team was efficient and professional when moving my house full of heavy furniture and shelving. They took great care and all pieces arrived without damage. Very positive experience!

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IV. PATTERN OF UNLICENSED ADVERTISING

The record shows advertising and solicitation before any PUC application was filed, including:

- September 3, 2025 – Miracle Movers Google listing redirected to Drew Moves;
- October 6, 2025 – Website launched claiming “NOW OPEN” and insured;
- October 15, 2025 – Facebook advertising for moving and storage services;
- October 21, 2025 – Household Goods application filed, approximately 48 days after advertising began.

This conduct is inconsistent with Applicant's "labor-only" characterization and reflects disregard for Commission licensing requirements.

V. HISTORY OF NONCOMPLIANCE, COMPLAINTS, AND LITIGATION

During Mr. Zeffiro's tenure with Miracle Movers Pittsburgh, the carrier received multiple PUC complaints, including:

- **C-2020-3022120** (resolved in complainant's favor);
- **C-2024-3051987**; and
- **C-2025-3056319** (failure to meaningfully participate).

Mr. Zeffiro is also named by name in multiple civil actions involving consumer harm, including:

- *Symanski, Christine & Gregg v. Miracle Movers, et al.*
- *Thomas, Paulann et al. v. Zeffiro, Andrew*
- *Peluso v. Zeffiro*
- *Yina Chahin v. Andrew Zeffiro*
- *Nilsen v. Zeffiro*
- *Daniel Hooven v. Miracle Movers Pittsburgh, Andrew Zeffiro*

This history reflects an ongoing pattern of consumer harm and regulatory noncompliance, not isolated or routine disputes.

VI. LAW ENFORCEMENT INVOLVEMENT

Applicant's Reply mischaracterizes Respondent's contact with law enforcement.

- Respondent's involvement with law enforcement was reactive, arising from documented verbal threats and harassing communications by Mr. Zeffiro directed toward the consumer.
- Respondent contacted the North Regional Police Department in early September 2025 and again on October 17, 2025, and personally reported to the police station to document the conduct. Police contact Andrew on both occasions advising him to cease communications and harassment of Respondent.
- In October 2025, Mr. Zeffiro made a false accusation of vehicle arson against Respondent. Respondent cooperated fully with the Castle Shannon Police Department and was promptly cleared of any wrongdoing.

VII. CONCLUSION

- Applicant’s Reply seeks to create a narrative that Respondent is merely a “disgruntled customer.” That narrative is unsupported by the record and ignores the substance of the evidence before the Commission.
- Respondent is a Pennsylvania consumer who suffered substantial and irreversible property damage and related harm arising from conduct that occurred under Andrew Zeffiro’s management. That harm is reflected in a valid civil judgment and in multiple regulatory and judicial proceedings involving Mr. Zeffiro, many in which he knowingly refused to appear or participate.
- Respondent is not attempting to relitigate private claims before this Commission. Rather, Respondent’s participation is motivated by a legitimate and proper purpose: to prevent other Pennsylvania consumers from being placed in a similar situation through unlicensed operations, misleading advertising, and sworn misrepresentations to the Commission.
- The documented record of unauthorized operation, inconsistent certifications, repeated complaints, civil litigation, and law-enforcement involvement bears directly on fitness and the public interest and cannot be dismissed by characterizing the source of that evidence as “disgruntled.”
- For these reasons, the Bureau’s denial of Household Goods operating authority is supported by the record, and reconsideration is not warranted. The PUC made the right decision to deny his application, and Applicant’s decision to appeal is unwarranted.

Respectfully submitted,

Daniel Hooven
Respondent