

BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

C-2026-3060048

RESPONDENT DREW MOVES LLC'S MOTION TO DISMISS FORMAL COMPLAINT

Respondent Drew Moves, LLC t/a Drew Moves (“Drew Moves”) hereby moves to dismiss the above formal complaint and states as follows:

1. Complainant, Daniel Hooven is a disgruntled former client of Miracle Movers of Pittsburgh (“Miracle”), which is a certificated moving company that Respondent’s owner, Andrew Zeffiro, is a former employee of. Miracle has ceased operating in Pennsylvania, but has not filed a discontinuance of its operating authority.¹

2. Mr. Hooven previously filed an enforcement complaint against Miracle, at Dkt. C-2025-3056319. When Miracle did not respond to this complaint as it has ceased operating in Pennsylvania, Mr. Hooven filed a near-identical complaint against Drew Moves at Dkt. C-2025-3057902, which was dismissed as improperly filed on December 5, 2025.

3. Mr. Hooven has also filed a protest to Respondent’s pending application to operate as a motor common carrier of household goods in use at Dkt. A-2025-3058207 on November 24, 2025, despite no formal protest period being opened by the Commission. Mr. Hooven then proceeded to file two additional filings in that case, an opposition to Drew Moves’ petition for reconsideration of the denial of his requested operating authority on December 23, 2025, and a reply to Drew Moves’ answer to the same on December 31, 2025.

4. Mr. Hooven is not hand has never been a customer of Drew Moves, LLC. His complaint does not request any specific relief that pertains to himself. Rather, he is transparent

¹ Mr. Zeffiro does not have the authority to file a discontinuance on behalf of Miracle. Undersigned counsel has offered to file a discontinuance for Miracle at no charge, but received no response from Miracle.

that he has a vendetta against Mr. Zeffiro, feels that Mr. Zeffiro is not fit to operate, believes that he has evidence that Mr. Zeffiro is providing household goods moving services without operating authority, and requests that the Commission deny his application for operating authority.

5. On the contrary, Drew Moves LLC's petition for operating authority is separately pending before the Commission and will be decided in due course. Mr. Hooven has stated his case against that petition in at three separate filings on that docket. It is inappropriate for Mr. Hooven to file a formal complaint as a collateral attack on Drew Moves LLC's petition for operating authority. Mr. Hooven's repeated filings have created a "whack a mole" situation for Drew Moves LLC that is wasting both its and the Commission's resources.

6. To the extent that Mr. Hooven has standing to contest Drew Moves LLC's application, which Drew Moves LLC has disputed, this is something that should happen on the application docket (Dkt. A-2025-3058207), and not through separate collateral formal complaints. Accordingly, this complaint should be dismissed.

7. Drew Moves LLC is advertising and performing labor-only moving services, which are not regulated by the PUC and do not require any operating authority. Drew Moves is not performing full-service moving (i.e. taking possession of a customer's household goods on a truck operated by Drew Moves LLC), and Mr. Zeffiro understands that he is not permitted to do this intrastate in Pennsylvania unless and until operating authority is granted by the PUC. Mr. Hooven appears not to understand this distinction.

WHEREFORE, Petitioner Drew Moves, LLC respectfully request that the Commission dismiss the formal complaint.

Respectfully Submitted,

Dated: January 29, 2026

/s/Andrew J. Horowitz, Esq.

Andrew J. Horowitz, Esq.

Pa. ID No. 311949

OBERMAYER REBMANN MAXWELL & HIPPEL LLP

525 William Penn Place, Ste. 1710

Pittsburgh, PA 15219

412-288-2461

andrew.horowitz@obermayer.com

Counsel for Petitioner

VERIFICATION

I, Andrew Zeffiro, 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).

Dated: 1/28/2026

Signed by:

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ANDREW ZEFFIRO