

RE: MOTION TO DISMISS FC - DREW MOVES

PUC C-2026-3060048

I respectfully submit this rebuttal to correct material misstatements in Respondent's Motion to Dismiss and to clarify the narrow, legitimate basis of my complaint. I have respect for the Pennsylvania Public Utility Commission and its statutory responsibility to regulate carriers and protect Pennsylvania consumers. I appear before the Commission as a Pennsylvania consumer who was victimized financially and personally by Andrew Zeffiro's conduct, not as an agitator or bad-faith complainant.

Respondent's counsel relies on disparaging, dismissive, and disrespectful character attacks rather than addressing the core regulatory issue presented. This filing is not about personality, motive, or past grievances. It is about compliance with PUC requirements and whether an applicant has knowingly misrepresented his operations to this Commission. Counsel's advocacy does not alter those obligations, nor does it excuse false or misleading conduct.

The following points address the substance of the Motion to Dismiss and the actual basis of the complaint.

- The central issue in this complaint is that Drew Moves LLC is actively advertising, soliciting, and operating as a full-service moving and storage company despite lacking PUC household goods authority.
- Andrew Zeffiro has knowingly signed sworn certifications to the Commission stating that he *is not* and *will not* operate as a regulated mover unless and until authority is granted. The conduct described above is directly inconsistent with those representations and proof is submitted.
- This complaint focuses on a specific PUC requirement: that applicants and entities not engage in regulated household goods operations prior to licensure and not misrepresent their activities to the Commission.
- I am not attempting to relitigate a prior judgment. That judgment simply establishes Mr. Zeffiro's history of consumer harm and credibility issues. The complaint before the Commission concerns current conduct and compliance.
- Counsel's attempt to frame this matter as a personal dispute ignores Mr. Zeffiro's documented pattern of civil judgments, regulatory complaints, and Commission proceedings, all of which stem from his own actions. I have no such records.

- To the extent multiple complaints or filings exist, they are the foreseeable result of Andrew Zeffiro's behaviors and choices, including advertising, soliciting, and operating without proper authority, not harassment by a consumer.
- The Commission independently denied Mr. Zeffiro's household goods application based on its own review and standards. That denial reflects the Commission's judgment, not the Complainant's advocacy.
- Despite counsel's assertions, Drew Moves LLC continues to present itself to the public as a full-service moving and storage provider, a factual issue squarely within the Commission's jurisdiction.
- If Respondent's counsel had personally experienced the destruction of a home and property exceeding \$27,600, or threats directed toward his family by a moving company's management, his dismissal of consumer complaints might reasonably differ. I recognize that counsel has chosen to earn his living defending clients in these circumstances; that choice does not negate consumer harm or excuse noncompliance.

This complaint was filed with respect for the Pennsylvania Public Utility Commission and its consumer-protection mandate. It raises a straightforward question of truthfulness, compliance, and applicant fitness. Character attacks and narrative spin do not resolve whether an applicant has complied with PUC requirements or honored sworn certifications.

For these reasons, I respectfully request that the Motion to Dismiss be denied and that this matter proceeds to substantive review.

Thank you,

Daniel Hooven