



Response to 10-Day Data Request Letter

Applicant: **Lian's Movers LLC**
Docket No: A-2026-3060275
Date: 02/13/2026

To Whom It May Concern:

Lian's Movers LLC respectfully submits the following information in response to the Commission's Data Request Letter.

Question 3 – Evidence of Experience

In response to the request for evidence of two years' experience with a licensed household goods carrier, attached are sworn affidavits detailing the relevant experience of:

- **Andres Santos, Owner**, who has more than two (2) years of hands-on experience performing household goods moving services under licensed household goods carriers; and
- **Andrew Santos, Manager**, who has over eight (8) years of experience working with licensed household goods carriers outside the Commonwealth of Pennsylvania.

Due to the closure of the prior companies for whom services were performed, traditional employment documentation such as paystubs or employer reference letters is unavailable. The attached affidavits provide detailed information regarding the nature and duration of the experience obtained.

Question 5 – Driver Regulations

a. Criminal Background Checks

Criminal background checks will be conducted prior to employment and every two (2) years thereafter. Records will be maintained in secure personnel files and retained for a minimum of three (3) years following the end of employment.

Lian's Movers LLC
Date: 02/13/2026



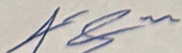
AFFIDAVIT OF EXPERIENCE

Docket No:A-2026-3060275

Commonwealth of Pennsylvania
County of Lehigh

I, **Andres Santos**, being duly sworn according to law, depose and state as follows:

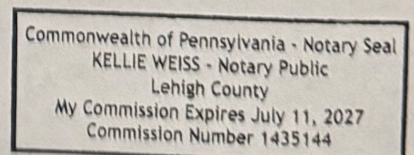
1. I am the Owner of Lian's Movers LLC and the applicant seeking authority to operate as a motor carrier of household goods within the Commonwealth of Pennsylvania.
2. From approximately **February 2023 through December 2024**, I performed household goods moving services under the direction of **Reliable Movers**, a licensed household goods carrier operating in the Commonwealth of Pennsylvania.
3. During this period, my duties included loading and unloading household goods, preparing and completing inventories, safeguarding and protecting customer property, wrapping and handling furniture, assisting with transportation of household goods, and interacting directly with customers during residential relocations.
4. To the best of my knowledge and belief, Reliable Movers was properly licensed to provide household goods transportation services during the time I performed these services.
5. I gained more than two (2) years of hands-on experience in the household goods moving industry during this period.
6. I make this affidavit voluntarily and under penalty of perjury to satisfy the experience requirement set forth in 52 Pa. Code §3.381(c)(1)(iii)(A)(II).


Andres Santos

Date: 2/17/2026

Sworn and subscribed before me this 17 day of Feb, 2026

This document was acknowledged before
me on 2/17/2026
by [Signature]



Commonwealth of PA
County of Lehigh



AFFIDAVIT OF EXPERIENCE

Docket No:A-2026-3060275

Commonwealth of Pennsylvania

County of Lehigh

I, **Andrew Santos**, being duly sworn according to law, depose and state as follows:

1. I have more than eight (8) years of experience working in the household goods moving industry under licensed household goods carriers.
2. From approximately **1994 through 2002**, I worked for **3 B's Company**, a licensed household goods carrier operating in the State of New York.
3. My duties included driving moving vehicles, supervising moving crews, loading and unloading household goods, preparing inventories, protecting customer property, and assisting with residential and commercial relocations.
4. To the best of my knowledge and belief, 3 B's Company was properly licensed to provide household goods moving services during the time of my service.
5. Although the company is no longer in operation, the experience gained during this period provided substantial industry knowledge and operational expertise.
6. I make this affidavit voluntarily and under penalty of perjury in support of the application of Lian's Movers LLC for operating authority.

Andrew Santos

A handwritten signature in black ink, appearing to read "Andrew Santos", written over a horizontal line.

Date: 2-17-26

Sworn and subscribed before me this 17th day of Feb, 2026

Notary Public

A handwritten signature in black ink, appearing to read "Sohil P Ghodasara", written over a horizontal line.

My Commission Expires: 07/18/2029

Commonwealth of Pennsylvania - Notary Seal
Sohil P Ghodasara, Notary Public
Lehigh County
My Commission Expires 07/18/2029
Commission Number 1317200



Docket No:A-2026-3060275

b. Driver License / Driver History Checks

Driver license verification and Motor Vehicle Record (MVR) checks will be conducted prior to hire and annually thereafter. Copies of these records will be maintained in personnel files and retained for at least three (3) years following termination of employment.

c. Drug and Alcohol Testing Policy

Lian's Movers LLC maintains a zero-tolerance policy regarding illegal drug use and impairment. Testing will be conducted pre employment, post accident, upon reasonable suspicion, and randomly if required under applicable state or federal regulations. Records of testing will be maintained confidentially and retained in accordance with applicable regulatory requirements.

Question 6 – Vehicle Information

Lian's Movers LLC intends to purchase a properly registered vehicle suitable for household goods transportation prior to commencing full operations. Upon acquisition, the Year, Make, Model, VIN, and mileage will be provided to the Commission as required.

To initiate operations, the applicant may utilize a commercially rented vehicle. In such case, Lian's Movers LLC will maintain required commercial automobile liability and cargo insurance coverage through its own insurance policy. The applicant's insurer will file **Form E (Proof of Liability Insurance)** and **Form H (Proof of Cargo Insurance)** with the Pennsylvania Public Utility Commission prior to commencing operations, including coverage applicable to owned, leased, or rented vehicles.

The applicant will not engage in operations until all required insurance filings are properly in place.

Verification Statement (Required by 52 Pa. Code §1.36)

I, **Andres Santos**, 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).

Andres Santos
Owner
Lian's Movers LLC
Date: 02/13/2026



Balance Sheet Correction

Applicant: Lian's Movers LLC
Docket No:A-2026-3060275

The previously submitted Statement of Financial Position reflected \$40,000 under total liabilities in error. That entry was incorrect.

Attached is a corrected Statement of Financial Position, along with a current bank statement for Lian's Movers LLC reflecting the listed balance.

Respectfully submitted,

Andres Santos
Owner
Lian's Movers LLC



Statement of Financial Position

Docket No:A-2026-3060275

As of 02/13/2026

Assets

Cash – Business Checking: \$1,016.78

Business Savings: \$60,004.31

Total Assets: \$ 61,021.09

Liabilities

None

Total Liabilities: \$0

Owner's Equity: \$61,021.09



P.O. Box 20450
 Lehigh Valley, PA 18002-0450
 Return Service Requested

Account Statement

LIAN'S MOVERS LLC
 4031 KILMER AVE
 ALLENTOWN PA 18104-3307

Member Number	Statement Period
██████████	12/1/2025 to 12/31/2025
Account Balance at a Glance	
Total Savings	\$60,004.31
Total Checking	\$1,016.78
Total Certificates	\$0.00
Total Loans	\$0.00

Fee Waiver for Paper Statements

Effective February 2, 2026, the age requirement for the fee waiver for paper statements will increase from **age 55 to age 65**.

- Members **under age 65** may begin to see a fee for receiving paper statements.
- Members **age 65 and older** will continue to receive paper statements at no charge.

You can avoid this \$3 fee by enrolling in eStatements. Visit firstcomcu.org/estatemnts for full details. If you have questions or need help enrolling, call **888.821.2400** or visit any Financial Center.

BUSINESS SAVINGS

SUFFIX: 0

Beginning Balance:	\$60,006.80
Annual Percentage Yield Earned	0.010%
Average Daily Balance	60,006.80

POST DATE	DESCRIPTION	AMOUNT	BALANCE
12/01	Previous Balance		\$60,006.80
12/31	Deposit Dividend 0.010%	\$0.51	\$60,007.31
	Annual Percentage Yield Earned 0.010% from 12/01/2025 through 12/31/2025		
12/31	Withdrawal PAPER STMT FEE	-\$3.00	\$60,004.31
12/31	Ending Balance		\$60,004.31

BASIC BUSINESS CHECKING

SUFFIX: 1

Beginning Balance:	\$7,863.95
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POST DATE	DESCRIPTION TRANSACTION/REFERENCE NUMBER	AMOUNT	BALANCE
12/01	Previous Balance		\$7,863.95
12/02	Deposit ACH RT0A61B3415E1D3	\$1,000.00	\$8,863.95
	TYPE: TRANSFER CO: CAPITAL ONE NAME: RT0A61B3415E1D3		
12/02	Withdrawal ACH ATT	-\$215.16	\$8,648.79
	TYPE: PAYMENT CO: ATT		
12/04	Withdrawal Home Banking Transfer To Loan 0077	-\$1,000.00	\$7,648.79
12/04	Withdrawal ACH ALLSTATE INS CO	-\$334.58	\$7,314.21
	TYPE: INS PREM CO: ALLSTATE INS CO NAME: SANTOS		
12/05	Withdrawal ACH ASTOUND	-\$61.19	\$7,253.02
	TYPE: TELECOMM CO: ASTOUND		
12/05	Deposit Debit Card	\$100.00	\$7,353.02
	CASH APP*ANDRES SANTOS*CA Oakland CA Date 12/05/25		
	04059360000130008300080 4829		

