

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

JAMES SAMUEL DEFOGGI,

Trustee for the Defoggi Family

Irrevocable Living Trust,

Complainant,

v.

Docket No. C – 2026-3061661

DUQUESNE LIGHT COMPANY,

Respondent.

REPLY TO NEW MATTER OF DUQUESNE LIGHT COMPANY

NOW COMES Complainant, James Samuel Defoggi, Trustee for the Defoggi Family Irrevocable Living Trust, to file this Reply to the New Matter of Duquesne Light Company ("Respondent") pursuant to 52 Pa. Code § 5.63. Complainant denies all material allegations set forth in Respondent's New Matter as follows:

1. **Denied.** It is denied that this is a residential consumer dispute. The account was settled and zeroed out at its inception in **August 1997**.
2. **Denied.** Complainant is not a "residential consumer" but is a Trustee acting in a fiduciary capacity for the **Defoggi Family Irrevocable Living Trust**, an entity established of public record at the Beaver County Courthouse on **November 8, 2024**.

3. **Denied.** The alleged balance of **\$432.97** is factually and legally incorrect. Pursuant to the **Assignment of Interest dated August 9, 2025**, and the **Statement of Account** served upon Respondent, the verified balance is **\$0.00**.
4. **Denied.** Respondent's "New Matter" is based on an obsolete accounting ledger. Under **Accrual Basis Accounting** and the **All Events Test (26 U.S.C. § 461)**, Respondent had a mandatory obligation to reconcile this account to the Trust's standing. Respondent's failure to recognize the August 9, 2025 Assignment constitutes a violation of **66 Pa. C.S. § 1501**.
5. **Denied.** The Commission has jurisdiction over this matter as it involves the failure of a public utility to provide "adequate and reasonable service" by maintaining inaccurate, non-reconciled corporate ledgers for nearly **29 years**.

WHEREFORE, Complainant respectfully requests that the Commission strike Respondent's New Matter, recognize the **\$0.00 balance** established by the Administrative Record, and grant all relief requested in the Formal Complaint.

Respectfully submitted,

A handwritten signature in blue ink that reads "James Samuel Defoggi - TTEE". The signature is written in a cursive style with a horizontal line underneath the name.

James Samuel Defoggi, Trustee

VERIFICATION

I, James Samuel Defoggi, Trustee, hereby state that the facts set forth in the foregoing Reply to New Matter are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

A handwritten signature in blue ink that reads "James Samuel Defoggi - TRUSTEE". The signature is written in a cursive style and is positioned above a horizontal line.

James Samuel Defoggi, Trustee

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

A handwritten signature in blue ink that reads "James Samuel Defoggi - TTEE". The signature is written in a cursive style and is positioned above a horizontal line.

James Samuel Defoggi, Trustee

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Reply to New Matter, Master Letter, and Exhibits A-E** upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Via First Class Mail, Postage Prepaid: Sophia Al Rasheed, Esq.

Regulatory Counsel IV

Duquesne Light Company

411 Seventh Avenue, Mail Drop 15-7

Pittsburgh, PA 15219

Date: May 1, 2026

A handwritten signature in blue ink that reads "James Samuel Defoggi - TTEE". The signature is written in a cursive style and is positioned above a horizontal line.

James Samuel Defoggi, Trustee

NOTICE OF SERVICE OF ADMINISTRATIVE RECORD; REBUTTAL OF "NEW MATTER"; NOTICE OF 29-YEAR ACCOUNTING DEFAULT

NOTICE TO AGENT IS NOTICE TO PRINCIPAL; NOTICE TO PRINCIPAL IS NOTICE TO AGENT.

Ms. Al Rasheed,

I am in receipt of your "Answer and New Matter" filed on April 29, 2026. Your filing is factually bankrupt as it ignores the pre-existing standing of the **Defoggi Family Irrevocable Living Trust**, an entity established as a matter of public record on November 8, 2024.

Enclosed is the **Perfected Administrative Record** which renders your "New Matter" mooted by the following facts:

1. **Judicial Recognition (Exhibit A):** My status as Trustee is established. Your claim that the Commission lacks jurisdiction over this status is a collateral attack on the existing record.
2. **Assignment and Account Inception (Exhibit B):** Enclosed is the notarized Assignment dated August 9, 2025. To be clear: this account was settled and zeroed out at its inception in August 1997. This Assignment and the Public Record filing of the Trust formalize a commercial reality that Duquesne Light has ignored for nearly 29 years.
3. **Accounting Fraud and the "All Events Test" (Exhibit C):** Enclosed is a verified Statement of Account establishing a balance of \$0.00. As an accrual-basis corporation, Duquesne Light was required to book this account at a zero balance from day one in 1997. Your failure to do so, and your subsequent verification of a "debt" on April 29, 2026, constitutes the maintenance of inaccurate books and a violation of 26 U.S.C. § 461.
4. **Fiduciary Standing (Exhibits D & E):** Enclosed are the Trust Resolution and UCC-1 Financing Statement. Your attempt to re-classify this as a "residential consumer" dispute is a failure to provide "adequate and reasonable service" under 66 Pa. C.S. § 1501.

DEMAND FOR WITHDRAWAL: You have three (3) days from the receipt of this record to withdraw your "New Matter" and update your records to reflect the \$0.00 balance that has existed since 1997. Failure to cure the record will result in a formal Motion to Strike your pleadings for fraud upon the tribunal.

Govern yourself accordingly.

With all rights reserved,

A handwritten signature in blue ink that reads "James Samuel Defoggi" followed by a horizontal line and the word "TRUSTEE" written in capital letters.

James Samuel Defoggi, Trustee

Commonwealth Docket Sheet**Commonwealth Court of Pennsylvania****Docket Number: 416 CD 2026****Page 1 of 2****April 26, 2026****CAPTION**James-Samuel: Defoggi, Trustee,
Petitioner

v.

Department of Human Services,
Respondent**CASE INFORMATION**

Initiating Document: Petition for Review

Case Status: Active

Case Processing Status: April 2, 2026 Awaiting Original Record

Journal Number:

Case Category: Administrative Agency

Case Type(s): Human Services, Department of

CONSOLIDATED CASES**RELATED CASES****COUNSEL INFORMATION**Pro Se: James-Samuel Defoggi
Address: 103 Shanor Dr.
New Brighton, PA 15066Attorney: Serafin, Kenneth J.
Law Firm: Commonwealth of Pennsylvania
Address: Pa-Dhs-office Of General Counsel
625 Forster St 3rd Fl West
Harrisburg, PA 17120
Phone No: (717) 783-2800 Fax No:Attorney: Burroughs, Ryan Matthew
Law Firm: Governor's Office of General Counsel
Address: Pa Dept Of Human Services
625 Forster St Fl 3 West
Harrisburg, PA 17120
Phone No: (717) 783-2800 Fax No:**AGENCY/TRIAL COURT INFORMATION**

Order Appealed From: February 25, 2026

Notice of Appeal Filed:

Order Type: Decision

Documents Received: March 30, 2026

Court Below: Department of Human Services, Bureau of Hearings and Appeals

County: Division:

Department of Human Services, Bureau
of Hearings and Appeals

Judge: OTN:

Docket Number: B-25-12-07176 Judicial District:

EXHIBIT "A"

Commonwealth Docket Sheet

Commonwealth Court of Pennsylvania

Docket Number: 416 CD 2026

Page 2 of 2

April 26, 2026



ORIGINAL RECORD CONTENT

Original Record Item	Filed Date	Content Description
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Date of Remand of Record:

BRIEFING SCHEDULE

None

None

DOCKET ENTRY

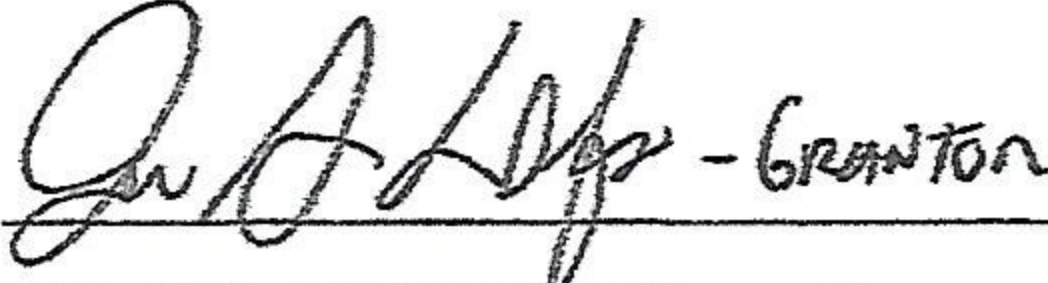
Filed Date	Docket Entry / Filer	Representing	Participant Type	Exit Date
March 25, 2026	Petition for Review Filed Defoggi, James-Samuel		Petitioner	
March 25, 2026	Application to Proceed In Forma Pauperis Defoggi, James-Samuel		Petitioner	
March 31, 2026	Entry of Appearance Burroughs, Ryan Matthew Document Name: Atty, Burroughs for Respondent	Department of Human Services	Respondent	
April 2, 2026	Notice Exited Commonwealth Court Filing Office			04/02/2026
April 6, 2026	Defect Correction Notice Commonwealth Court Filing Office Document Name: Needs Filing Fee or Correct App. to Proceed IFP			04/06/2026
April 10, 2026	Filed - Other Defoggi, James-Samuel Document Name: Notice of Corrected Capacity and Administrative Demand to Cure the Record		Petitioner	
April 20, 2026	Response to Defect Correction Notice Defoggi, James-Samuel Document Name: Filed Corrected App. for IFP		Petitioner	
April 20, 2026	Application to Proceed In Forma Pauperis Defoggi, James-Samuel Document Name: Corrected		Petitioner	

ASSIGNMENT OF BUSINESS INTERESTS

KNOWN BY ALL THESE PRESENT:


FOR VALUE RECEIVED, I, the undersigned transferor hereby assign and transfer unto James Defoggi, as Trustee of the DEFOGGI FAMILY IRREVOCABLE LIVING TRUST (the "Transferee") all of my rights and title to DUQUESNE LIGHT COMPANY ACCOUNT, with account # 5020-972-597, consisting of 100% of membership interest.

IN WITNESS WHEREOF, the undersigned has executed this assignment of Business Interests on the date below.



JAMES S DEFOGGI, as Grantor
Date: 8-9-25

The Transferee of the above-referenced business interests hereby agrees, effective upon the transfer of such business interests, to be bound by the terms of any applicable agreement relating to the business, as may be amended, as if the Transferee had signed such agreement and was a party thereto.



James Defoggi, as Trustee

The DEFOGGI FAMILY LIVING TRUST
Date: 8-9-25

I declare under penalties of perjury in accordance with the laws of the United States of America (without the "United States") Title 28 U.S.C. § 1746(1) the forgoing is true and correct and is admitted when not rebutted, so help me.

Done this 9TH day of AUGUST 2025

By: [Signature] - TTEC

JURAT

State of PENNSYLVANIA
County of BEAVER

Sworn to (or affirmed) and subscribed before me on this 09 day of AUGUST 2025 by James Defoggi- Trustee , proved to me on the basis of satisfactory evidence to be the one who appeared before me, and executed the forgoing instrument for the purpose stated therein and acknowledged that said execution was by his free act and deed.

[Signature]
Notary Public's Signature

8-9-2025
Date

My Commission Expires: 10 01 2026

Commonwealth of Pennsylvania - Notary Seal
James G. Hardt, Notary Public
Beaver County
My commission expires October 1, 2026
Commission number 1066723
Member, Pennsylvania Association of Notaries



To: **DUQUESNE LIGHT COMPANY**
% Matt Ankrum Chief Financial Officer
411 7TH Avenue
Pittsburgh, Pennsylvania 15219-1919

From: **DEFOGGI FAMILY IRREVOCABLE LIVING TRUST**
James Samuel Defoggi Trustee, c/o 103 Shanor Dr, New Brighton, PA 15066

RE: **Account No. 5020-972-597**

REQUEST REGARDING A STATEMENT OF ACCOUNT

NOTICE OF MANDATORY COMPLIANCE PURSUANT TO UCC § 9-210: This Request for Statement of Account is a formal "authenticated record" as defined in UCC § 9-210(a)(4). Pursuant to UCC § 9-210(d), the recipient is required to comply with this request within 14 days after receipt. Failure to timely provide the requested accounting or to dispute the balance of \$0.00 as stated herein shall constitute an administrative default and an admission of the facts as presented.

STATEMENT OF ACCOUNT

DATE: 24 April 2026

PAYEE: DUQUESNE LIGHT COMPANY

DEBTOR(S): JAMES S DEFOGGI JR

ACCOUNT(S): Account No. 5020-972-597

COLLATERAL: All rights, titles, and interests in and to Duquesne Light Company, account number 5020-972-597, including all associated credits, set-offs, adjustments, and the aggregate amount of unpaid obligations.

BALANCE DUE: \$0.00

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

By:  - TTEE
James Samuel Defoggi - Trustee

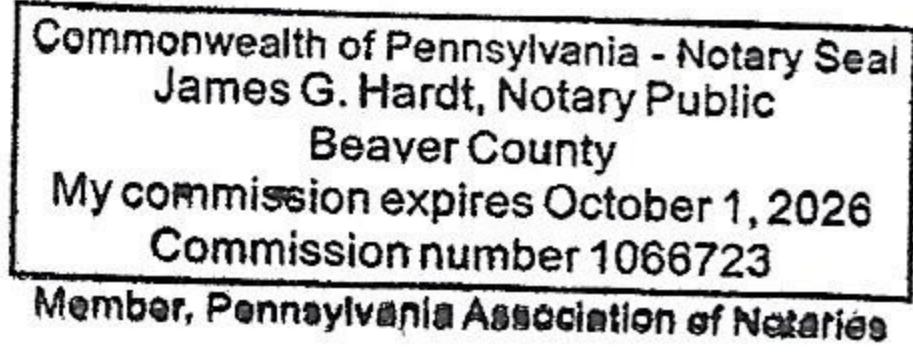
EXHIBIT "C"

JURAT

State of Pennsylvania)
) affirmed and subscribed
County of Beaver)

Subscribed and sworn to (or affirmed) before me on this 24 day of
APRIL, 2026, by **James Samuel Defoggi- Trustee**, proved to me on the
basis of satisfactory
evidence to be the person(s) who appeared before me.

(Seal)



James G. Hardt
(Signature of notarial officer)

TRUSTEE'S RESOLUTION ADOPTING PRIVATE SECURITY AGREEMENT

NAME OF ESTATE: DEFOGGI FAMILY IRREVOCABLE LIVING TRUST

RECORDING DATE: NOVEMBER 8, 2024

ADMINISTRATIVE RECORD NO: JSD-2026-001-RES

EFFECTIVE DATE: APRIL 13, 2026

WHEREAS, the DEFOGGI FAMILY IRREVOCABLE LIVING TRUST (hereinafter "the Trust") was established and officially recorded on November 8, 2024, for the purpose of managing and protecting the assets and private interests of the Estate; and

WHEREAS, the Trustee holds the express, non-delegable authority to enter into commercial contracts, security agreements, and indemnity bonds to safeguard Trust assets and ensure the preservation of the Trust Estate; and

WHEREAS, a Private Security Agreement (Control No. JSD-2026-001) was executed on March 23, 2026, between the Debtor and the Secured Party/Trustee to secure the Trust's superior interest in various accounts, instruments, and general intangibles;

NOW, THEREFORE, BE IT RESOLVED BY THE TRUSTEE THAT:

1. **ADOPTION:** The Trustee hereby formally adopts, ratifies, and incorporates Private Security Agreement JSD-2026-001 as a foundational governing instrument and a senior asset of the Trust Estate.
2. **ASSIGNMENT:** All claims, legal entitlements, fee schedules, penalties, and liquidated damages arising from said Agreement are hereby irrevocably assigned to the Trust.
3. **PUBLIC NOTICE:** The Trustee is authorized to execute and file all necessary UCC-1 Financing Statements using categorical descriptions to perfect these interests. **This authority specifically includes the perfection of Initial Financing Statement File No. 20260413077816, filed with the Pennsylvania Department of State on April 13, 2026.** This public notice serves to protect the private assets of the Trust without the necessity of disclosing the full private terms of the Agreement to the public record.

SO RESOLVED this 13th day of April, 2026.

 - TRUSTEE

James Samuel Defoggi, Trustee

DEFOGGI FAMILY IRREVOCABLE LIVING TRUST

EXHIBIT "D"

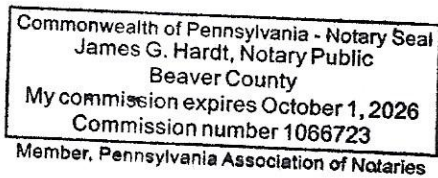
JURAT / AFFIDAVIT OF TRUTH

STATE OF PENNSYLVANIA)

COUNTY OF BEAVER)

Subscribed and sworn to (or affirmed) before me on this 13th day of April, 2026, by James Samuel Defoggi, who proved to me on the basis of satisfactory evidence to be the person who appeared before me, and who acknowledges that the statements above are true and correct to the best of his knowledge and belief.

(Seal)



James G. Hardt

Notary Public Signature

My Commission Expires: 10 01 2026



Pennsylvania Department of State
Bureau of Corporations and Charitable Organizations
PO Box 8721 | Harrisburg, PA 17105-8721
T: 717.787.1057
dos.pa.gov/BusinessCharities

DEFOGGI FAMILY IRREVOCABLE LIVING TRUST
JAMES SAMUEL DEFOGGI
JAMES SAMUEL DEFOGGI - TRUSTEE
P.O. BOX 101
ROCHESTER, PA 15074

April 13, 2026
File No.: 20260413077816

Lien Acknowledgment

FILING INFORMATION

Lien Type:	UCC
Lien File No.:	20260413077816
File Date:	4/13/2026 10:52 AM
Lapse Date:	4/13/2031 11:59 PM

DEBTOR INFORMATION

Debtor Name:	JAMES SAMUEL DEFOGGI
Debtor Address:	103 SHANOR DRIVE NEW BRIGHTON, PA 15066

SECURED PARTY INFORMATION

Secured Party Name:	DEFOGGI FAMILY IRREVOCABLE LIVING TRUST
Secured Party Address:	P.O. BOX 101 JAMES SAMUEL DEFOGGI - TRUSTEE ROCHESTER, PA 15074

EXHIBIT "D"



20260413077816

B1037-4268 04/13/2026 10:53 AM Received by Pennsylvania Department of State



COMMONWEALTH OF PENNSYLVANIA
 Department of State
 Bureau of Corporations and Charitable Organizations
 PO Box 8721
 Harrisburg, Pennsylvania 17105-8721
UCC1 FINANCING STATEMENT
 Fee: \$84

Pennsylvania Department of State

-FILED-

File #: 20260413077816
 Date Filed: 4/13/2026

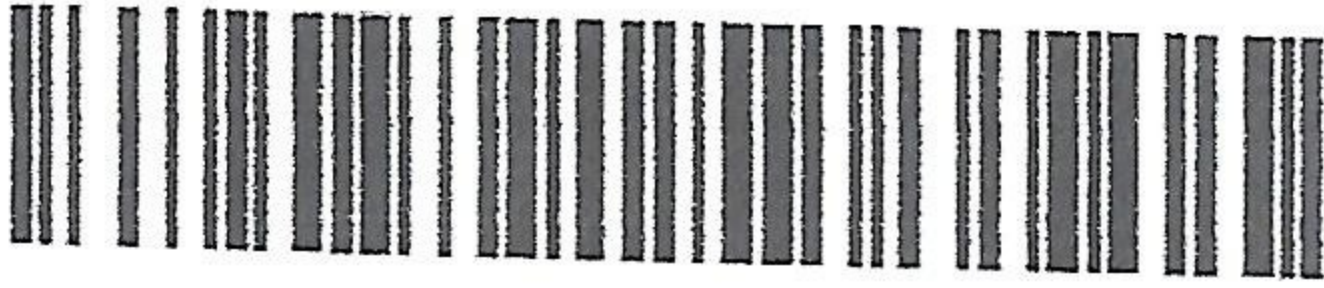
Submitter contact information								
Contact Name	James Samuel Defoggi							
Phone Number	(724) 680-2994							
Email Address	jcadefoggi1@comcast.net							
Submitter information								
Name	DEFOGGI FAMILY IRREVOCABLE LIVING TRUST							
Address	JAMES SAMUEL DEFOGGI - TRUSTEE P.O. BOX 101 ROCHESTER, PA 15074							
Debtors								
<table border="1"> <thead> <tr> <th>DEBTOR'S NAME</th> <th colspan="2">MAILING ADDRESS</th> </tr> </thead> <tbody> <tr> <td>JAMES SAMUEL DEFOGGI</td> <td colspan="2">103 SHANOR DRIVE NEW BRIGHTON, PA 15066</td> </tr> </tbody> </table>			DEBTOR'S NAME	MAILING ADDRESS		JAMES SAMUEL DEFOGGI	103 SHANOR DRIVE NEW BRIGHTON, PA 15066	
DEBTOR'S NAME	MAILING ADDRESS							
JAMES SAMUEL DEFOGGI	103 SHANOR DRIVE NEW BRIGHTON, PA 15066							
Secured Parties								
<table border="1"> <thead> <tr> <th>SECURED PARTY'S NAME</th> <th>MAILING ADDRESS</th> <th>Assignor</th> </tr> </thead> <tbody> <tr> <td>DEFOGGI FAMILY IRREVOCABLE LIVING TRUST</td> <td>JAMES SAMUEL DEFOGGI - TRUSTEE P.O. BOX 101 ROCHESTER, PA 15074</td> <td><input type="checkbox"/></td> </tr> </tbody> </table>			SECURED PARTY'S NAME	MAILING ADDRESS	Assignor	DEFOGGI FAMILY IRREVOCABLE LIVING TRUST	JAMES SAMUEL DEFOGGI - TRUSTEE P.O. BOX 101 ROCHESTER, PA 15074	<input type="checkbox"/>
SECURED PARTY'S NAME	MAILING ADDRESS	Assignor						
DEFOGGI FAMILY IRREVOCABLE LIVING TRUST	JAMES SAMUEL DEFOGGI - TRUSTEE P.O. BOX 101 ROCHESTER, PA 15074	<input type="checkbox"/>						
Collateral								
<p>"All right, title and interest in all accounts, General intangibles, investment property and security entitlements, as those terms are defined in the Uniform Commercial Code, and all products and proceeds thereof."</p> <p>The collateral is held in a Trust</p>								
Designations								
Select the designation which describes this financing statement	Not Applicable							
Select an additional designation which describes this financing statement	Not Applicable							
Alternative Designations								
Select the alternative designation which describes this financing statement	Not Applicable							
Optional Submitter Reference Data								
<input type="checkbox"/> This FINANCING STATEMENT is to be filed [for record] (or recorded) in the REAL ESTATE RECORDS (if applicable)								
<p>This financing statement:</p> <input type="checkbox"/> covers timber to be cut <input type="checkbox"/> covers as-extracted collateral								

<input type="checkbox"/> is filed as a fixture filing
Name and address of a RECORD OWNER of real estate described below (if Debtor does not have a record interest)
Description of real estate
Miscellaneous



RONALD H. ALBERTI
BEAVER COUNTY RECORDER OF DEEDS
 810 Third Street, Beaver, PA 15009
 Phone (724) 770-4560

RECORDING COVER/CERTIFICATION PAGE



Recording:

Cover Page	2.00
Recording Fee	13.00
Writ Tax	0.50
Record Improvement Fund	5.00
Reference Fee	2.00

INSTRUMENT #: 3704746

Receipt#: 20241092039
Clerk: PG
Rec Date: 11/13/2024 11:52:48 AM
Doc Grp: RP
Descrip: DECLARATION OF TRUST
Num Pgs: 4
Rec'd Frm: JAMES DEFOGGI

Total: 22.50
 **** NOTICE: THIS IS NOT A BILL ****

Party1: DEFOGGI TRUST
Party2: DEFOGGI TRUST

Record and Return To:

JAMES DEFOGGI/PICK-UP

I hereby CERTIFY that this document is recorded in the Recorder of Deeds Office of Beaver County, Pennsylvania



Ronald H. Alberti

Ronald H. Alberti
 Recorder of Deeds

PLEASE DO NOT DETACH
THIS PAGE IS NOW PART OF THIS LEGAL DOCUMENT

NOTE: If document data differs from cover page sheet, document data always supersedes.
***COVER PAGE MAY NOT INCLUDE ALL DATA, PLEASE SEE INDEX AND DOCUMENT FOR ANY ADDITIONAL INFORMATION**

EXHIBIT "E"



RONALD H. ALBERTI

810 Third Street
Beaver, PA 15009

Receipt

Receipt Date: 11/13/2024 11:52:48 AM
RECEIPT # 20241092039

Recording Clerk: PG
Cash Drawer: CASH1
Rec'd Frm: JAMES DEFOGGI

724-680-2994

Instr#: 3704746
DOC: DECLARATION OF TRUST
OR Party: DEFOGGI TRUST
EE Party: DEFOGGI TRUST

Recording Fees	
Cover Page	\$2.00
Recording Fee	\$13.00
Writ Tax	\$0.50
Record Improvement Fund	\$5.00
Reference Fee	\$2.00

DOCUMENT TOTAL: ----> \$22.50

Receipt Summary

Document Count: 1	
TOTAL RECEIPT: ---->	\$22.50
TOTAL RECEIVED: ---->	\$40.00

CASH BACK: ---->	\$17.50
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PAYMENTS

Cash ->	\$40.00
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A

TRUST CERTIFICATE OF DEFOGGI FAMILY TRUST

Sole Property of the DEFOGGI FAMILY TRUST Registered, No.996564391., dated November 08, 2024 ©.

In Pennsylvania, Section 7790.3 governs the contents and effect of the certificate.

THIS CERTIFICATE OF TRUST, being executed by the undersigned, declaring and publishing the following:

The Grantor, Trustor, Settlor, or Maker

JAMES S. DEFOGGI as (the "Grantor") and JAMES S. DEFOGGI as (the "Primary Trustee")

The Name & Existence of the Living Trust

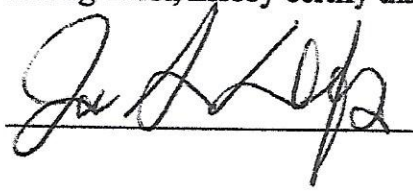
The Grantor created a private trust called *DEFOGGI FAMILY TRUST* (the "Living Trust"), executed and established November 08, 2024. The Living Trust has not been revoked, modified or amended in such a way that would contradict what is stated in this Certificate of Trust, and remains in full force and effect, nothing in this section limits the authority to modify a trust pursuant to Non-Judicial Modification. In Pennsylvania, the certification of trust is governed by Section 7790.3. A certificate of trust is used by an acting trustee or trustees of a trust to prove to financial institutions or other third parties that he/she/they has/have the authority to act on behalf of the trust. The certificate is used in lieu of the full trust document to keep nonessential information about the trust, such as the identities of trust beneficiaries, confidential.

Successor Trustees: *COLE DAVID DEFOGGI, AIDEN JAMES DEFOGGI*

The Office of DEFO Administration (the "Office") The Office is an unincorporated office, located at such a place or places where the Living Trust is to be administered.

pb

IN WITNESS WHEREOF, the undersigned, being duly appointed as the Primary Trustee of the Living Trust, hereby certify that the above information is true and correct.



JAMES S DEFOGGI (Primary Trustee)

PENNSYLVANIA NOTARY PUBLIC CERTIFICATE OF ACKNOWLEDGEMENT A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document

UNITED STATES OF AMERICA


STATE OF PENNSYLVANIA

COUNTY OF BEAVER

On this 12 day of NOVEMBER 2024, before me, JAMES G. HARDT Notary Public, personally appeared: who proved to me on the oath of JAMES S DEFOGGI — on the basis of satisfactory evidence to be the Primary Trustee, whose name is subscribed to the within instrument, and acknowledged to me that he/she executed the same in his/her authorized capacity, and that by his/her signature on the instrument the person, or the entity upon behalf of which the Primary Trustee acted, executed this instrument.

I certify under PENALTY OF PERJURY under the laws of the state of Pennsylvania that the foregoing paragraph is true and correct.

Given under my hand this date 12 DAY NOV. 2024

(Seal) 

Notary Public JAMES G. HARDT

Commonwealth of Pennsylvania - Notary Seal
James G. Hardt, Notary Public
Beaver County
My commission expires October 1, 2026
Commission number 1066723
Member, Pennsylvania Association of Notaries

My Commission Expires: 10 01 2026

IN WITNESS WHEREOF, the Grantor hereto have caused this living trust to be duly executed and signed his/her name as of the date first above written, declaring and publishing this governing instrument as the Grantors' Living Trust.

JAMES S DEFOGGI, (Grantor)

[Handwritten Signature]
(Grantor Signature)

IN WITNESS WHEREOF, the Trustee hereby accepted appointment as trustee of this Living Trust and signed his/her name as of the date first above written, to this governing instrument.

JAMES S DEFOGGI, (Trustee)

[Handwritten Signature]
(Trustee Signature)

NOTARIAL TESTAMENT

In our presence, the Grantor has declared and published that the living governing instrument is their Living Trust, and the Trustee have accepted appointment as trustee of the Living Trust, and both has signed their names in the presence of the undersigned Witnesses, and we have hereunto subscribed our names as of the date first above written.

Witness # 1 Name (Please Print) Randy L. Fisher Witness # 2 (Please Print) Michael K Wilson
Witness # 1 Signature [Handwritten Signature] Witness # 2 Signature [Handwritten Signature]

STATE OF PENNSYLVANIA

COUNTY OF BEAVER

On this 12 day of NOVEMBER, 2024 Before me, JAMES G. HARDT, a notary public in the state of PA, county BEAVER personally appeared RANDY L FISHER, MICHAEL WILSON personally known to me (or provided to me based upon satisfactory evidence) to be the person(s) whose name(s) are subscribed to the within instrument and acknowledged that he executed the same in his/her signature on the instrument the person(s) or entity on behalf of which they acted, executed the instrument.

Witness my hand and official seal. [Handwritten Signature]

Notary Public of PA

My Commission Expires 10 01 2026

Commonwealth of Pennsylvania - Notary Seal
James G. Hardt, Notary Public
Beaver County
My commission expires October 1, 2026
Commission number 1066723
Member, Pennsylvania Association of Notaries