



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

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November 22, 2019

Mark L. Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

RE: *Washington Utilities and Transportation Commission v. InnerPrizin LLC d/b/a VIP Party Bus Spokane; Driven VIP*  
Commission Staff's Response to Application for Mitigation of Penalties  
Docket TE-190877

Dear Mr. Johnson:

On October 30, 2019, the Washington Utilities and Transportation Commission (Commission) issued a penalty assessment against InnerPrizin LLC d/b/a VIP Party Bus Spokane, and Driven VIP, (InnerPrizin or Company), in the amount of \$500 for a violation of Washington Administrative Code (WAC) 480-30-221, Vehicle and Driver Safety Requirements, which adopts Title 49 Code of Federal Regulations (49 CFR) Part 382 – Controlled Substance and Alcohol Use and Testing, as follows:

- **One violation of 49 CFR § 382.301(a) – Using a driver before the motor carrier has received a negative pre-employment controlled substance test result.** InnerPrizin allowed driver Charlene Gresham to operate a commercial motor vehicle before the Company received a negative pre-employment controlled substance test.

On November 4, 2019, InnerPrizin filed with the Commission its application for mitigation of penalties. In the request for mitigation, Shaylon Reed, owner of InnerPrizin, admits the violations, and believes the penalties should be reduced. InnerPrizin states that it did not previously understand the regulation, and claims that the penalties would cause financial hardship.

On October 25, 2019, the Company submitted to staff a corrective action safety plan in which the Company acknowledges the violation and describes steps it has taken to prevent future occurrences. InnerPrizin states that it has implemented new procedures to ensure that every

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driver is tested and receives a negative pre-employment controlled substance test result before operating a commercial motor vehicle.

Staff response: InnerPrizin has implemented new procedures to prevent future occurrences of this violation. The assessed penalty is \$500 for one occurrence of this first-time violation. Staff recommends the penalty be reduced to \$250.

InnerPrizin is a small company that operates one commercial motor vehicle and employs three drivers. The Company reported \$52,971 in gross revenue for 2018. Staff recommends the penalty of \$500 be reduced to \$250.

If you have any questions, please contact Michael Dotson, Compliance Investigator, Transportation Safety, at (360) 664-1217, or by email at [Michael.Dotson@utc.wa.gov](mailto:Michael.Dotson@utc.wa.gov).

Sincerely,

*/s/ Jason Sharp*  
Jason Sharp  
Motor Carrier Safety Supervisor, Transportation Safety