



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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January 5, 2024

Kathy Hunter, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

RE: *Washington Utilities and Transportation Commission v. RenoRelo Worldwide, LLC, d/b/a ProRelo Group, LLC*  
Commission Staff's Response to Application for Mitigation of Penalties  
Docket TV-230988

Dear Ms. Hunter:

On December 21, 2023, the Washington Utilities and Transportation Commission (Commission) issued a penalty assessment against RenoRelo Worldwide, LLC, d/b/a ProRelo Group, LLC (RenoRelo Worldwide or Company), in the amount of \$2,000 for violations of Washington Administrative Code (WAC) 480-15-555, Criminal Background Checks for Prospective Employees; WAC 480-15-560, Vehicle and Driver Safety Requirements, which adopts Title 49 Code of Federal Regulations (49 C.F.R.) Part 382 – Controlled Substance and Alcohol Use and Testing, and 49 C.F.R. Part 391 – Qualification of Drivers, as follows:

- **Fourteen violation of WAC 480-15-555 – Failure to complete a criminal background check for every person the carrier intends to hire.** The Company failed to acquire a criminal background check for drivers Allen Barger, James Brunner, Christopher Cato, Robert Cobean, Sarah Hazard, Dominic Jackson, Olivia Jensen, Kyle Lichtscheidl, Deborah Lus, Katheryn Renfro, Jean Robinson, Terri Singer, Kimberly Soeder, and Rick Soeder.
- **One violation of 49 C.F.R. § 382.301(a) – Using a driver before the motor carrier has received a negative pre-employment controlled substance test result.** RenoRelo Worldwide allowed driver Christopher Cato to operate a commercial motor vehicle (CMV) before the Company received a negative pre-employment controlled substance test result.
- **Three violations of 49 C.F.R. § 391.51(b)(2) - Failing to maintain inquiries into driver's driving record in driver's qualification file.** The Company failed to maintain a driver qualification file for drivers Christopher Cato, Robert Cobean, and Kyle Lichtscheidl.

On January 2, 2024, the Company filed with the Commission its application for mitigation of penalties. In the request for mitigation, Dominic Jackson, general manager of RenoRelo Worldwide, admits the violations and asks that the penalties be reduced.

On January 2, 2024, RenoRelo Worldwide submitted to Staff a corrective action safety plan in which the Company acknowledges the violations and describes steps it took to prevent future occurrences.

In response to the Company's application for mitigation of penalties, RenoRelo Worldwide submitted a corrective action plan demonstrating that the Company: (1) implemented background checks for all new hires; (2) implemented training for drugs and alcohol for all Washington employees.; and (3) developed a checklist that will be kept in each driver's qualification file. Staff addresses the penalties, as follows:

- The Commission assessed a \$1,400 penalty for 14 violations of WAC 480-15-555. RenoRelo Worldwide states that they have implemented a process to obtain background checks for all future employees. The Company also provided background checks for all current Washington employees. Staff recommends the \$1,400 penalty be reduced to \$700 for these first time critical-type violations.
- The Commission assessed a penalty of \$500 for 49 C.F.R. § 382.301(a). RenoRelo Worldwide has provided staff with evidence that its commercial drivers have taken pre-employment controlled substances testing. The Company states that it will complete drug and alcohol training for all Washington employees by the first quarter of 2024. The Company states they have fixed a software issue preventing all employees from being added to random drug and alcohol screening. Staff recommends the \$500 penalty be reduced to \$250 for this first time critical-type violation.
- The Commission assessed a penalty of \$100 for three violations of 49 C.F.R. § 391.51(b)(2). The Company states that it has implemented a checklist for each driver's qualification file for review of the required documents. The Company states they will have physical audits conducted of driver files in March and October of each year. Staff recommends the \$100 penalty be reduced to \$50 for these first time violations.

Staff recommends the assessed \$2,000 penalty be mitigated to \$1,000.

If you have any questions, please contact Jason Sharp, Compliance Investigator, Transportation Safety, at (360) 701-1603, or by email at [jason.sharp@utc.wa.gov](mailto:jason.sharp@utc.wa.gov).

Sincerely,

Jason Sharp  
Motor Carrier Safety Supervisor, Transportation Safety