

	US DOT # 3668237	Legal: LION MOVERS LLC Operating (DBA):	
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MC/MX #:	State #: THG070121	Federal Tax ID:	
Review Type: Compliance Review (CR)			
Scope:	Principal Office	Location of Review/Audit: Company facility in the U. S.	Territory:

Operation Types	Interstate	Intrastate		
Carrier:	N/A	Non-HM	Business: Corporation	
Shipper:	N/A	N/A	Gross Revenue: \$38,565.00	for year ending: 12/31/2023
Cargo Tank:	N/A			

Company Physical Address:
131 GLENNWOOD PLACE
RENTON, WA 98056

Contact Name: Almaz Nurmanbetov
Phone numbers: (1) 312-778-1350 (2) 206-697-5721 **Fax**
E-Mail Address: lionmoversllc@gmail.com

Company Mailing Address:
733 7TH AVE B 202
KIRKLAND, WA 98033

Carrier Classification
Authorized for Hire

Cargo Classification
Household Goods

Equipment

	Owned	Term Leased	Trip Leased	Owned	Term Leased	Trip Leased
Truck	1	0	1			

Power units used in the U.S.:2
Percentage of time used in the U.S.:100

Does carrier transport placardable quantities of HM? No
Is an HM Permit required? N/A

Driver Information

	Inter	Intra	Average trip leased drivers/month:
< 100 Miles:			Total Drivers: 2
>= 100 Miles:		2	CDL Drivers: 0





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Part A

QUESTIONS regarding this report or the Federal Motor Carrier Safety or Hazardous Materials rules may be addressed to the Office of Motor Carriers at:

Tracy Cobile
 P.O. Box 47250 Olympia, WA 98504-7250
[Phone: \(360\) 790-0653](tel:(360)790-0653) [Email: tracy.cobile@utc.wa.gov](mailto:tracy.cobile@utc.wa.gov)

This report will be used to assess your safety compliance.

Person(s) Interviewed

Name: Almaz Nurmanbetov

Title: Owner

Name:

Title:





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Part B Violations

STATE	Primary: [Code]	Discovered	Checked	Drivers/Vehicles In Violation	Checked
1 CRITICAL	Primary: 395.8(a)(1) CFR Equivalent: 395.8(a)(1)	26	60	2	2
<p>Description Failing to require a driver to prepare a record of duty status using the appropriate method.</p> <p>Example Driver: Rick De Wijs Trip Date: May 31, 2024 Description of violation: The carrier failed to require the driver to make a record of duty status using the proper method. The carrier used the BOLs to track time in, time out and total hours. The timecards were absent of the actual activity of the drivers reporting to work, pre-trips, drive time to the customer, drive time back to the work reporting location and post-trips.</p> <p>Also in violation: Driver: Almaz Nuramenbetov Trip Date: May 31, 2024</p>					
2	Primary: 390.19(b)(2) CFR Equivalent: 390.19(b)(2)	1	1	1	1
<p>Description Failing to file the appropriate form under 390.19(a) (MCS-150, 150B, or 150C) each 24 months according to the schedule.</p> <p>Example Driver: Almaz Nurmanbetov Trip Date: June 13, 2024 Description of violation: The motor carrier failed to update the MCS-150 registration form with the correct PPOB and number of drivers.</p>					
3	Primary: 391.21(a) CFR Equivalent: 391.21(a)	2	2	2	2
<p>Description Using a driver who has not completed and furnished an employment application.</p> <p>Example Driver: Rick De Wijs Trip Date: May 31, 2024 Description of violation: The carrier is using a driver who has not completed and furnished an employment application in accordance with the regulations, see recommendations and requirements for detailed information of what an employment application requires.</p> <p>Also in violation: Almaz Nurmanbetov</p>					
4	Primary: 391.51(b)(2) CFR Equivalent: 391.51(b)(2)	1	2	1	2
<p>Description Driver Investigation History file must contain a copy of the response by each State agency concerning a driver's driving record pursuant to §391.23(a)(1);</p> <p>Example Driver: Almaz Nurmanbetov Trip Date: June 13, 2024 Description of violation: The carrier failed to maintain the driver time of hire MVR in the driver qualification file.</p>					





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5 STATE	Primary: 391.51(b)(3) CFR Equivalent: 391.51(b)(3)	Discovered 2	Checked 2	Drivers/Vehicles In Violation 2	Checked 2
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Description

Failing to maintain road test certificate in driver's qualification file, or copy of license or certificate the motor carrier accepted as equivalent.

Example

Driver: Rick De Wijs

Trip Date: May 31, 2024

Description of violation: The carrier failed to maintain a copy of the road test in the driver qualificaiton file.

Also in violation:

Driver Almaz Nurmanbetov

Trip Date: June 13, 2024

6 STATE	Primary: 391.51(b)(5) CFR Equivalent: 391.51(b)(5)	Discovered 2	Checked 2	Drivers/Vehicles In Violation 2	Checked 2
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Description

Failing to maintain a note relating to the annual review of the driver's driving record as required by 391.25(c)(2).

Example

Driver: Rick De Wijs

Trip Date: May 31, 2024

Description of violation: The carrier failed to maintain a note, including the name of the person who performed the review of the driving record as required for calendar year 2024.

Driver: Almaz Nurmanbetov

Trip Date: June 13, 2024

Description of violation: The carrier failed to maintain a note, including the name of the person who performed the review of the driving record as required for calendar year 2023 and 2024.

7 STATE	Primary: 391.51(b)(8)(i)	Discovered 2	Checked 2	Drivers/Vehicles In Violation 2	Checked 2
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Description

Failing to place a note relating to verification of medical examiner listing on the National Registry of Certified Medical Examiners required by § 391.23(m)(1) in driver qualification file.

Example

Driver: Rick De Wijs

Trip Date: May 31, 2024

Description of violation: The carrier failed to place a note in the driver qualification file relating to verification of Medical Certificate on the National Registry.

Also in violation:

Driver: Almaz Nurmanbetov

Trip Date: June 13, 2024





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8 STATE	Primary: WAC 480-15-555 (1) CFR Equivalent: 392.2	Discovered 1	Checked 3	Drivers/Vehicles In Violation 1 Checked 3
<p>Description Failure to complete a nationwide criminal background check for every person the carrier intends to hire. Driver/Employee: Cesar Carias Hernandez Trip Date: November 30, 2023 Hire Date: November 30, 2023 Description of violation: The carrier failed to obtain and review a criminal background check for this driver/employee prior to allowing them to work. The driver/employee background check was obtained on November 30, 2023 at 7:41 p.m. and the driver/employee worked prior to 7:41 p.m.</p>				
9 STATE	Primary: 396.3(b)(1) CFR Equivalent: 396.3(b)(1)	Discovered 1	Checked 3	Drivers/Vehicles In Violation 1 Checked 3
<p>Description Failing to keep a maintenance record which identifies the vehicle, including make, serial number, year, and tire size. Example Driver: Rick De Wijs Trip Date: May 31, 2024 WA License Plate: C23965S VIN: 1FVACWDC87DZ14118 Description of violation: The vehicle maintenance file was missing the tire size as one of the five required vehicle identifiers.</p>				
10 STATE	Primary: 396.9(d)(3) CFR Equivalent: 396.9(d)(3)	Discovered 1	Checked 3	Drivers/Vehicles In Violation 1 Checked 3
<p>Description Failing to maintain completed inspection form for 12 months from the date of inspection at the carrier's principal place of business or where vehicle is housed. Example Driver: Cesar Carias Hernandez Trip Date: November 30, 2024 Vehicle: Unit 14, 2022 Isuzu VIN: JALE5W166N7307067 Issuing Agency: Washington State Patrol Report #: WAW822001297 Description of violation: The carrier failed to maintain a completed inspection report for 12 months from the date of the inspection at the carrier's PPOB.</p>				
11 STATE	Primary: WAC 480-15-590	Discovered 1	Checked 2	Drivers/Vehicles In Violation 1 Checked 2
<p>Description Failing to ensure that all conditions are met when entering into an equipment lease agreement before operating a leased motor vehicle. Example Driver: Rick De Wijs Trip Date: May 31, 2024 Leased Vehicle: 2022 Isuzu - VIN: JALE5W166N7307067 Description of violation: The carrier failed to maintain a valid original lease agreement maintained at the principal place of business for review at the time of this investigation. The carrier trip leased two vehicles in the last 365 days.</p>				





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<p>Safety Fitness Rating Information:</p> <p>Total Miles Operated 8,000</p> <p>Recordable Accidents 0</p> <p>Recordable Accidents/Million Miles 0.00</p>	<p>OOS Vehicle (CR): 1</p> <p>Number of Vehicle Inspected (CR): 1</p> <p>OOS Vehicle (MCMIS): 0</p> <p>Number of Vehicles Inspected (MCMIS): 0</p>
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<p>Your proposed safety rating is :</p> <p>CONDITIONAL</p>	<p>Rating Factors Acute Critical</p>		
	<p>Factor 1: S</p> <p>Factor 2: S</p> <p>Factor 3: U</p> <p>Factor 4: S</p> <p>Factor 5: N</p> <p>Factor 6: S</p>	<p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>-</p>	<p>0</p> <p>0</p> <p>2</p> <p>0</p> <p>0</p> <p>-</p>





Part B Requirements and/or Recommendations

1. HOS COMPLIANCE BASIC PROCESS BREAKDOWN: Policies and Procedures

DESCRIPTION OF PROCESS BREAKDOWN: Owner, Almaz Nurmanbetov failed to require drivers to complete the HOS requirements using the proper method.

BASIC SPECIFIC RECOMMENDED REMEDIES

Implement Safety Improvement Practices: The following are recommended practices related to Policies and Procedures.

- Develop a policy and procedure describing how management will monitor and track logs for falsification.
- Establish a policy that prohibits dispatchers from assigning a load to drivers without hours available to complete the load on time.
- Develop a policy stating that drivers should not violate their Hours-of-Service (HOS) Out-of-Service (OOS) order under any circumstances, and immediately contact the carrier when a driver is placed OOS.
- Develop a policy requiring drivers to report their available hours to dispatch during "check-in" calls.
- Develop policies and procedures for ensuring proper retention of Record of Duty Status (RODS) according to regulations.
- Establish a policy requiring drivers to submit copies of all roadside inspections to carrier management within 24 hours.
- Develop a policy stating that drivers are required to submit all Records of Duty Status (RODS) and supporting documentation, such as expense receipts, within 13 days of the end of the trip.
- Establish a policy stating that drivers are required to check with their supervisor, manager, or dispatcher to review their "fit-for-duty" status before starting a job, and that drivers who are ill to the extent that their ability and/or alertness is impaired are prohibited from working on safety-sensitive assignments.
- Develop a written and progressive disciplinary policy focused on taking corrective action to ensure drivers comply with regulations and policies. A progressive disciplinary policy could include, among other things, written warnings, suspensions, or work restrictions, monetary penalties, and termination. This policy should also specify consequences for any carrier official who knowingly and willfully allows Hours-of-Service (HOS) violations.

2. DRIVER QUALIFICATION BASIC PROCESS BREAKDOWN: Monitoring and Tracking

DESCRIPTION OF PROCESS BREAKDOWN: Owner, Almaz Nurmanbetov failed to maintain a complete driver qualification file to include the time of hire MVR.

BASIC SPECIFIC RECOMMENDED REMEDIES

Ensure that all drivers are fully and properly qualified before operating in interstate commerce. Maintain a complete file as required for each driver, documenting the qualification process.

3. Establish a systematic maintenance records program for all vehicles. Maintain a complete file for each subject vehicle, recording all repair, maintenance and inspection operations performed and identification on each file should include make, model year, VIN, unit number and tire size.

4. Criminal background checks for prospective employees.

- (1) Each carrier must complete a criminal background check for every person the carrier intends to hire.
- (2) The carrier must keep evidence that it has completed a criminal background check for every person the carrier intends to hire for as long as that person is employed and for three years thereafter.
- (3) No carrier may hire a person who has been convicted of any crime involving theft, burglary, assault, sexual misconduct, identity theft, fraud, false statements, or the manufacture, sale, or distribution of a controlled substance within the past five years.





Part B Requirements and/or Recommendations

5. Required information for employment application:

1. The name and address of the employing motor carrier.
2. The applicant's name, address, date of birth, and social security number.
3. The addresses at which the applicant has resided during the 3 years preceding the date on which the application is submitted.
4. The date on which the application is submitted.
5. The issuing State, number, and expiration date of each unexpired commercial motor vehicle operator's license or permit that has been issued to the applicant.
6. The nature and extent of the applicant's experience in the operation of motor vehicles, including the type of equipment (such as buses, trucks, truck tractors, semitrailers, full trailers, and pole trailers) which he/she has operated.
7. A list of all motor vehicle accidents in which the applicant was involved during the 3 years preceding the date the application is submitted, specifying the date and nature of each accident and any fatalities or personal injuries it caused.
8. A list of all violations of motor vehicle laws or ordinances (other than violations involving only parking) of which the applicant was convicted or forfeited bond or collateral during the 3 years preceding the date the application is submitted.
9. A statement setting forth in detail the facts and circumstances of any denial, revocation, or suspension of any license, permit, or privilege to operate a motor vehicle that has been issued to the applicant, or a statement that no such denial, revocation, or suspension has occurred.
10.
 - (i) A list of the names and addresses of the applicant's employers during the 3 years preceding the date the application is submitted,
 - (ii) The dates he or she was employed by that employer,
 - (iii) The reason for leaving the employ of that employer,
 - (iv) After October 29, 2004, whether the (A) Applicant was subject to the FMCSRs while employed by that previous employer.
11. For those drivers applying to operate a commercial motor vehicle as defined by part 383 of this subchapter, a list of the names and addresses of the applicant's employers during the 7-year period preceding the 3 years contained in paragraph (b)(10) of this section for which the applicant was an operator of a commercial motor vehicle, together with the dates of employment and the reasons for leaving such employment.
12. The following certification and signature line, which must appear at the end of the application form and be signed by the applicant.

6. Leasing vehicles.

A carrier must enter into an equipment lease agreement before operating a leased motor vehicle. The carrier must ensure that all of the following conditions are met:

- (1) The carrier signs the form and ensures the lessor signs the form.
- (2) The carrier marks "master lease" if the carrier intends to use a master lease instead of individual leases.
- (3) A copy of the lease is carried in all leased motor vehicles.
- (4) Copies of all leases are kept in the carrier's permanent files for at least one year after the lease expires.
- (5) The carrier gives a copy of the lease to the owner of the leased motor vehicle.
- (6) The carrier takes possession, control and use of the motor vehicle during the period of the lease agreement.
- (7) The leased motor vehicle is properly insured as specified in WAC 480-15-530 and 480-15-550.
- (8) The carrier properly identifies the motor vehicle as specified in RCW 81.80.305.
- (9) The carrier charges appropriate tariff rates and charges.
- (10) The driver of the leased motor vehicle is on the carrier's payroll during the leased period.
- (11) The leased motor vehicle is operated in compliance with laws and rules as specified in WAC 480-15-560 and 480-15-570.
- (12) The driver of the leased motor vehicle is subject to the company's alcohol and controlled substance policies.
- (13) The carrier and the owner of the leased motor vehicle specify on the lease form who is responsible for all





Part B Requirements and/or Recommendations

expenses relating to the leased motor vehicles.
(14) The carrier complies with the terms of the lease.

7. "Have you reviewed your data?"

The SMS results are based on your State-reported crash or inspection data. Be sure to review your data in SMS for accuracy. If you think there is an error, request a data review (RDR) by registering for DataQs through the FMCSA Portal at <https://portal.fmcsa.dot.gov> or through the DataQs system directly at <http://dataqs.fmcsa.dot.gov/>."

8. Understand Why Compliance Saves Time and Money: Compliance with FMCSRs will not only save lives, but also saves your business time and money. Tracking how much your business spends on non-compliance activities can help you understand the many benefits of compliance to your business and why safety is good business.

Document and Follow Through on Action Plans: Document and follow through on action plans to ensure the actions you are taking are creating improvement in safety management and compliance.

NOTICE: A pattern and/or repeated violations of the same or related acute or critical regulations (violations of the same Part in Title 49, Code of Federal Regulations) will cause the maximum penalties allowed by law to be assessed under Section 222 of the Motor Carrier Safety Improvement Act of 1999 (MCSIA). A pattern of violations means two or more violations of acute and/or critical regulations in three or more Parts of Title 49, Code of Federal and during any eligible investigation. Repeated violations mean violation(s) of an acute regulation of the same Part of Title 49, Code of Federal Regulations discovered in an investigation after one or more closed enforcement actions within a six-year period and/or violation(s) of a critical regulation in the same Part of Title 49, Code of Federal Regulations discovered in an investigation after two or more closed enforcement actions within a six-year period.

The Pre-Employment Screening Program (PSP) is a screening tool that assists motor carriers in investigating crash history and roadside safety performance of prospective drivers. The PSP allows motor carriers to purchase 5 years of crash data and 3 years of roadside inspection data from the Federal Motor Carrier Safety Administration's (FMCSA) Motor Carrier Management Information System (MCMIS). Records are available 24 hours a day via Web request. Motor carriers should visit the following website or more information:
<http://www.psp.fmcsa.dot.gov/Pages/default.aspx>

All motor carriers and truck drivers are needed to fight against terrorism and hijacking. You could be a target. Protect yourself, your trucks, your cargo, and your facilities. Discuss with your employees/drivers the "Security Measures for Truck Drivers and Companies" which were provided and reviewed with motor carrier official. Motor carriers should visit the following website for more information:
<http://www.fmcsa.dot.gov/documents/Hijacking-Brochure.pdf>

9. Safety Management Plan (SMP) Requirement

You have been assessed a proposed safety rating of CONDITIONAL, within 60 days, send and have approved, a safety management plan to the UTC describing what actions you have taken in response to this review to ensure that you are complying with the Motor Carrier Safety Regulations.

The Washington Utilities and Transportation Commission (UTC) allows motor carriers to request an upgrade of its safety rating based on corrective action as defined in 49 CFR, section 385.17. The request for an upgrade must include a written description of correction actions taken, documentation of these corrective actions, and an explanation of how its operations meet the safety standards and factors specified in 49 CFR sections 385.5 and 385.7.

Within 60 days from the receipt of your proposed rating, you may request, in writing, a change to your safety rating based on corrective actions. You should do so as soon as possible so the UTC has the opportunity to review and evaluate your safety management plan before the effective date of the final safety rating. If you fail to obtain an





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improved rating within 60 days from the receipt of your proposed rating, the unsatisfactory rating will become final and you must cease operations.

You must develop a safety management plan:

1. The plan must address all violations on the most recent Compliance Review. Corrective actions to address other violations noted on your review must also be included.
2. Identify why the violations were permitted to occur.
3. Discuss the actions taken to correct the deficiency or deficiencies that allowed the violations to occur. Include actual documentation of this corrective action. (For example: documentation may include items such as new policies and procedures, training programs and sign-in lists, or copies of new forms.
4. Outline actions taken to ensure that similar violations do not reoccur in the future. **YOU MUST DEMONSTRATE THAT YOUR OPERATIONS CURRENTLY MEET THE SAFETY STANDARD AND FACTORS SPECIFIED IN 49 CFR 385.5 and 385.7.** To do so, you must demonstrate that you now have adequate safety management controls in place which function effectively to ensure acceptable compliance with applicable safety requirements.
5. If your request includes actions that will be conducted in the near future, such as training, reorganization of departments, purchasing of computer programs, etc, include a detailed description of the activity or training and a schedule of when that activity will commence and when it will be completed.
6. Include any additional documentation relating to motor carrier safety and the prevention of crashes that you believe supports your request.
7. Include a written statement certifying the carrier will operate within federal and state regulations and the carrier's operation currently meets the safety standard and factors specific in 49 CFR 385.5 and 385.7. A corporate officer; partner, or the owner of the company must sign the statement.

You must submit your request to:

Washington Utilities and Transportation Commission
 Attention: Jason Sharp, Motor Carrier Safety Supervisor
 jason.sharp@utc.wa.gov





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Part C

Reason for Review: Compliance Review
Planned Action: Compliance Monitoring

Parts Reviewed Certification:

325	382	383	387	390	391	392	393	395	396	397	398	399	171	172	173	177	178	180
	✓	✓		✓	✓	✓	✓	✓	✓									

Prior Reviews **Prior Prosecutions**

Unsat/Unfit Information

Is the motor carrier of passengers subject to the safety fitness procedures contained in 49 CFR part 385 subpart A, AND does it transport passengers in a commercial motor vehicle?

Does carrier transport placardable quantities of hazardous materials?

Unsat/Unfit rule: Not Applicable

Corporate Contact: Almaz Nurmanbetov
Corporate Contact Title: Owner

Special Study Information:

Remarks:

INVESTIGATIVE REPORT RECEIVED BY:

Name: Almaz Nurmanbetov
Title: Owner
Carrier Name: Lion Movers LLC
USDOT: 3668237
UTC Assignment: 124064
Date: July 9, 2024

REASON FOR THE INVESTIGATION:

As part of the 2024 Motor Carrier Safety routine safety investigation work plan, this investigation was assigned to Tracy Cobile, Special Investigator (SI) of the Washington Utilities and Transportation Commission (commission). The carrier operates in intrastate commerce. This is the carrier's initial review with the commission.

SCOPE OF THE INVESTIGATION:

This investigation is a comprehensive intrastate investigation and was assigned to SI Tracy Cobile on June 6, 2024. The carrier was contacted on June 6, via email and telephone, and a full investigation was set to begin June 13, 2024, as an on-site investigation. SI Cobile corresponded with Almaz Nurmanbetov (Owner) via email (lionmoversllc@gmail.com) and telephone 206-697-5721 during this investigation. Present at the start of the review was SI Cobile along with Nurmanbetov.

SMS was checked on June 12, and it was noted that no BASICs were in alert status.

CARRIER OPERATION DESCRIPTION:

Lion Movers LLC (carrier) is a household goods carrier operating out of Kirkland, Washington. The carrier is a provisional household goods company that began operations in March 2021 and received temporary operating authority on January 25, 2022. The carrier currently operates one owned straight truck and one trip leased straight truck classified as commercial motor vehicles (CMV) operating under the UTC permit. The carrier states the owned straight truck (VIN





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Part C

IFVACWDC87DZ14118) was not operational at the time of this inspection and was out of service (OOS) for engine related repairs. The only vehicle in operation at the time of the investigation was the trip leased vehicle (VIN 3ALACWFC7JPJK7356). The carrier currently employs two drivers operating within the state of Washington within the past 365 days. Lion Movers LLC recorded a gross revenue of \$38,565 for the calendar year ending December 31, 2023. The carrier is not and has not been involved in any emergency relief efforts in the last 365 days. The carrier currently operates in intrastate operations. The carrier last updated the Vehicle Miles Traveled (VMT) for 2022. Almaz Nurmanbetov is responsible for the carrier's safety program.

PRE-INVESTIGATION:

On June 16, a carrier information packet was emailed to the carrier requesting investigation information, the records that would need to be reviewed, and the information the carrier would need to make available. The carrier was requested to fill-out and return the carrier information packet with a list of all commercial motor vehicle drivers utilized in the past 12 months, a list of all commercial motor vehicles utilized in the last 12 months and an all-employee list prior to the start of this investigation. The carrier packet was returned complete via email on June 11. The documents requested at the time of review were a list of all accidents for the past 365 days from the date of review, driver qualification files for all drivers used within the past 12 months, insurance documentation, all records of duty status (logbooks/timecards) for the previous six months with supporting documents, all maintenance files and records for each commission regulated unit. A copy of the carrier's profile and MCS-150 were originally obtained through MCMIS on June 12.

Commission records show that the carrier (lionmoversllc@gmail.com) attended the LMS Household Goods Training provided by the commission on January 22, 2022. The in-depth live training provided by commission staff that covers compliance responsibilities and requirements of household goods carriers for consumer protection and safety was attended and completed by Nurmanbetov on June 26, 2024.

An affiliation with other motor carrier operations were discovered at the time of this investigation as follows:

- Moving Band LLC d/b/a Seattle Moving Services USDOT 3109972 - Nurmanbetov states he used to own this company in 2017 and has since sold the business.

- Nural Logistics LLC USDOT 3601607 - Nurmanbetov states that this is his business but is no longer in operation. SI Cobile instructed Nurmanbetov to go out of business on the USDOT number.

- Two Men and a Moving Van d/b/a Move For Less USDOT 3073774, UTC Permit HG067981 - Nurmanbetov states that he owns 25% of the company. When SI Cobile asked him where the company was located, who the owner was, if they shared drivers or trucks, Nurmanbetov was unable to answer the questions and was evasive. Nurmanbetov became defensive when questioned about this affiliation and stated he has nothing to do with Two Men and a Moving Van d/b/a Move For Less and questioned why the investigator needed to know this information.

During the pre-investigation it is routine for the investigator to check what vehicles are registered to the carrier and/or registered to the owner. SI Cobile discovered seven other CMVs registered to Almaz Nurmanbetov. When Cobile inquired about the vehicles Nurmanbetov became defensive and instead of answering if the vehicles were associated with or used in HHG moves for Lion Movers LLC, Nurmanbetov asked Cobile if it was a problem to own the vehicles and stated that he could own as many vehicles as he wanted. Cobile explained the process for discovery during the pre-investigation phase of the review and why the question of the additional seven CMVs is pertinent to the review. Cobile also stated that owning seven CMVs for personal use would not seem likely and more likely that this is a fleet of CMVs for business purposes. Nurmanbetov stated that he may lease out the vehicles to other carrier's from time to time, but that he only has one vehicle that he uses for Lion Movers LLC (VIN IFVACWDC87DZ14118). Cobile was not able to determine that the seven other CMVs were used by Lion Movers LLC, but was able to establish that at least one vehicle registered to Nurmanbetov (2004 FRHT - VIN 1FVACWDC44HN23410) was used in commerce by Two Men and a Moving Van LLC (USDOT 3073774) and stopped roadside on January 23, 2023 (Inspection WAW811001904).

CDLIS (DRIVER LICENSE) CHECK:

In accordance with the eFOTM, all driver license statuses were required to be checked based on the current number of drivers. The driver's checked were Almaz Nuramanbetov and Rick De Wijs. The license statuses were checked through CDLIS and Secure Access Washington (SAW). All driver license statuses are current and valid. See part 383 for details.

AUTHORITY:





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Part C

Lion Movers LLC is an authorized for-hire carrier of household goods operating in intrastate commerce and is required to have operating authority. The carrier operates under the USDOT number 3668237. The carrier has intrastate authority through the commission under permit number THG-070121.

INSURANCE:

Lion Movers LLC is required to maintain a minimum level of public liability insurance coverage of \$750,000. Insurance agent, Ludmila Dotsenko, email idotsenko@basinpacific.com, phone 253-874-0170 was contacted via email on June 18 to verify insurance, provide loss run reports if any and to confirm continued coverage in the last 365 days with no lapses in coverage, no response was received. The carrier provided a certificate of automobile liability insurance effective November 22, 2023, with a policy expiration date of November 22, 2024. The policy reflects a \$750,000 auto liability policy with Basin Pacific Insurance & Benefits (policy CA 04086133-2) and \$20,000 Cargo Insurance through Pennsylvania Manufacturers Association (policy 812301-9449810Y).

RED FLAG DRIVERS:

A&I (SMS) was checked through Portal on June 12, and the carrier has no drivers with red flag violations in the last 365 days.

DRUG AND ALCOHOL SUPPLEMENTAL REVIEW:

This is a full comprehensive investigation therefore a Drug and Alcohol Supplemental Review was not required.

HAZARDOUS MATERIALS SUPPLEMENTAL REVIEW:

Lion Movers LLC does not transport any hazardous materials that require placarding. A Hazardous Materials Supplemental Review is not required.

INVESTIGATION:

This is a full comprehensive investigation that checked Parts 376, 380, 382, 383, 390, 391, 392, 393, 395 and 396.

As part of this investigation the carrier provided the requested Bill of Ladings (BOL)/HHG Moves for review from December 6, 2023, through June 6, 2024. The BOLs presented were signed by the customers and the carrier with the UTC Permit Number (HG067981), phone number (253-215-1850), email address of info@twomenandamovingvan.com and website of www.twomenandamovingvan.com for Two Men and a Moving Van.

SI Cobile inquired as to why Lion Movers LLC was using the UTC permit number and contact information for Two Men and a Moving Van on all of its BOLs provided for review. Nurmanbetov stated that the carrier's Customer Relation Management (CRM) provider, Elromco (617-313-0200) sent the wrong information in error, and they will fix the error and get the BOLs to reflect Lion Movers LLC. On June 25, at 10:05 a.m. SI Cobile called and spoke with Ron Kh at Elromco. Kh states that any information added into the Elromco software happens at the user end and any changes to the information like permit number, phone number, address, email, and website would be managed through the carrier and only changed manually by Elromco if requested by the carrier.

Nurmanbetov indicated a 25% interest in Two Men and a Moving Van d/b/a Move for Less and was unable to provide any additional information about the company when initially asked about the affiliation. The MCS-150 dated November 13, 2023 for Two Men and a Moving Van d/b/a Move for Less has Almaz Nurmanbetov listed as the Vice-President and President.

Part 376 Lease and Interchange of Vehicles:

The carrier has trip leased two CMVs in the previous 365 days.

One violation of WAC 480-15-590 occurred when the carrier failed to maintain the original lease agreement for a trip leased vehicle the company operated within the last 365 days.
 (2022 Isuzu - VIN: JALE5W166N7307067)





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Part 380 Special Training:

Lion Movers LLC does not operate long combination vehicles (LCVs). The carrier has not employed drivers that meet the definition of entry level driver.

Part 40 and Part 382

Lion Movers LLC does not operate vehicles with a GVWR of 26,001 lbs. or more and is not required to have a controlled substance and alcohol testing program.

Part 383 Commercial Drivers' License:

The carrier employed three drivers that operated in the state of Washington over the past 365 days. Per eFOTM guidelines, a sample size of two drivers was required to be checked. The carrier does not use commercial vehicles with a GVWR of 26,001 lbs. or more and the drivers are not required to have a CDL.

Part 390 General FMCSR:

The carrier has not been involved in a Department of Transportation recordable accident in the last 365 days.

Lion Movers LLC last updated the MCS-150 on November 10, 2023, and the form shows 18,000 vehicle miles travelled (VMT) for calendar year 2022. Almaz Nurmanbetov recorded the VMT for 2023 as 8,000 on the pre-investigation questionnaire. The number of drivers on the MCS-150 and the principal place of business (PPOB) were incorrect.

One violation of 390.19(b)(2) occurred when the carrier failed to update the MCS-150 registration form with a correct driver count and PPOB.

Part 391 Qualification of Drivers:

The carrier employed a total of three drivers that operated in intrastate commerce during the previous 365 days with two current drivers. Per eFOTM guidelines, a sample size of two Driver Qualification Files were to be inspected. The driver files requested to be reviewed were for drivers Almaz Nurmanbetov and Rick De Wijs.

Two violations of 391.21(a) occurred when the carrier failed to ensure each driver had a complete employment application on file.

One critical-type violation of 391.51(b)(2) occurred when the carrier failed to maintain the drivers time of hire MVR in the driver qualification files.

Two violations of 391.51(b)(3) occurred when the carrier failed to maintain the road test in the driver qualification files.

Two violations 391.51(b)(5) occurred when the carrier failed to maintain a note in the driver qualification file relating to the annual review of the driver's driving record.

Two violations of 391.51(b)(8)(i) occurred when the carrier failed to place a note in the driver qualification file relating to verification of Medical Certificate on the National Registry.

In accordance with FMCSA Memorandum MC-ECS-2012-0004 medical certificates for 25 percent of the driver qualification file sample size (one) were to be selected for verification.

Driver Name: Almaz Nurmanbetov
Date of Birth: December 17, 1985
ME's License/Certificate Number: PA1003740
Date of Issuance of the MEC: June 10, 2024
MEC Expiration: September 10, 2024
National Registry Identification Number: 7200478866
Phone Number: 425-865-8060





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Date and Time Contacted: June 17, 2024 @ 4:25pm
Person Contacted: Elissa
Results: MEC Check Confirmed

The medical examiners certificate (MEC) for Nurmanbetov presented for review was issued June 10, 2024 with an expiration date of September 10, 2024, no other medical card was provided. On June 18, SI Cobile emailed Nurmanbetov requesting the previous MEC card for review. Nurmanbetov stated that he didn't have one, but made a point to add that he didn't drive during the time of his expired MEC. All timecards presented for driver Numanbetov in the previous six months indicate driving time for each day the driver worked, but Nurmanbetov denies driving on any of the days when the MEC was invalid.

SI Cobile discovered a gap in the MEC for Nurmanbetov from February 3, 2024, through June 9, 2024. According to the timecards submitted identifying drive time for Nurmanbetov, this driver would have been in violation of driving without a valid MEC on 50 occasions from February 3, 2024, through June 9, 2024. Nurmanbetov states that he did not drive during that time and copied the same information from De Wiji's timecard to Nurmanbetov's timecard to mirror the BOLs. SI Cobile was unable to substantiate actual driving activity during that period for Nurmanbetov outside of the timecards submitted by the carrier indicating that the driver drove.

Part 392 - Driving of Commercial Motor Vehicles:

Lion Movers LLC is an intrastate carrier and at the time of this investigation the carrier is current on its annual regulatory fees.

Almaz Nurmanbetov was informed that using radar detectors and handheld devices while driving is prohibited. The carrier operates in intrastate commerce and the UCR fee was not applicable to this carrier at the time of this investigation.

One critical-type violation of WAC 480-15-555 (1) occurred when the carrier allowed a driver to conduct HHG moves prior to having a criminal background check conducted and reviewed by the company.

Part 395 - Hours of Service:

Lion Movers LLC employed three drivers during the last 365 days, two drivers have driven during the last six months. In accordance with eFOTM procedures, a sample size of two Record of Duty Status (RODS) were required to be checked for a 30-day period. Lion Movers LLC operated all services under the short-haul exemption in Part 395.1(e) within the last 365 days and does not require an ELD.

For this investigation, a 30-day period was requested to be reviewed for May 1 - 30, 2024, for drivers Almaz Nurmanbetov and Rick De Wijs. This required that 60 RODS be checked. As part of the investigation, supporting documents were requested and reviewed.

On June 25, SI Cobile emailed (12:02 p.m.) and spoke with Nurmanbetov (12:15 p.m.) providing detailed technical assistance to the carrier regarding the HOS regulations and how to properly fill out and manage timecards. The HOS violations discovered were also discussed with Nurmanbetov in detail.

Twenty-six critical violations of 395.8(a)(1) occurred when the carrier failed to require drivers to make a record of duty status using the appropriate method.

Part 393 & 396 - Maintenance and Inspection:

The carrier owns one and has trip leased two straight trucks that are classified as commercial motor vehicles (CMV) in intrastate commerce during the last 365 days. The carrier currently operates one CMV. The carrier states the major vehicle maintenance and annual inspections are conducted primarily with Attaman LLC Truck Repair, 3012 S Fife Street, Tacoma, WA 98049.

Vehicle Maintenance Records:

In accordance with the eFOTM, a sample size of three vehicle maintenance files were to be reviewed.





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SI Cobile requested the maintenance files for vehicles:

VIN: IFVACWDC87DZ14118 - Owned vehicle, but not available for inspection due to engine repairs being scheduled/conducted.

VIN: 3ALACWFC7JPJK7356 - Trip leased vehicle in operation at the time of inspection.

VIN: JALE5W166N7307067 - Trip leased in the last 365-days.

One violation of 396.3(b)(1) occurred when the carrier failed to keep a maintenance record which includes the five required vehicle identifiers, the tire size was missing.

One violation of 396.9(d)(3) occurred when the carrier failed to maintain a roadside vehicle inspection form for 12 months from the date of inspection.

Driver Vehicle Inspection Reports (DVIRs):

The carrier only operates one vehicle. DVIRs are not required to be kept.

Vehicle Inspections:

In accordance with eFOTM, a sample size of one vehicle was to be inspected. The leased vehicle inspected was located where the truck is parked at 733 7th Avenue B 202, Kirkland, Washington 98033.

The vehicle inspected is as follows:

VIN: 3ALACWFC7JPJK7356 - CFR 396.3(a)(1) - vehicle placed OOS for brakes out of adjustment.
 See attached SafeSpect vehicle inspection report.

CLOSING INTERVIEW:

The closing interview was conducted on July 9, 2024, via telephone. Present at the closing interview was Cobile and Nurmanbetov. This investigation resulted in a conditional safety rating.

During the on-site interview Almaz Nurmanbetov did not provide clear answers to the direct questions by SI Cobile. Nurmanbetov would change his answers or ask to fix paperwork found to be in violation to then appear compliant. SI Cobile spent a lot of additional time trying to navigate through the inconsistent, misleading information and redirection by Nurmanbetov. Technical assistance was provided in detail to the carrier during the process of the entire investigation.

Examples of the inconsistency and redirection from Nurmanbetov as follows:

- Nurmanbetov stated that 733 7th Avenue B 202, Kirkland, WA 98033 is the carrier's PPOB where the main office was and where the truck is parked. Nurmanbetov asked Cobile to see the office, but once on the second floor of the building, Suite 202 had a different company name on it. Cobile asked about office space 202 and was told by Nurmanbetov that it was a shared office and when Cobile asked to see inside the office that is when Nurmanbetov admitted to not having any office space in the building. Cobile was able to determine that the actual PPOB for the carrier is located at 131 Glenwood Place, Renton, WA 98056, the carrier's home address. Nurmanbetov stated that his computer, files and management processes were housed and conducted at the Glenwood Place address.

- As part of the investigation process, affiliations with other carriers are investigated. Cobile found three possible affiliations with Moving Band LLC d/b/a Seattle Moving Services (USDOT #3109975), Nural Logistics LLC (USDOT #3601607) and Two Men and a Moving Van (USDOT #3073774).

Nurmanbetov's response to the carrier affiliations are as follows:

- Moving Band LLC d/b/a Seattle Moving Services (USDOT #3109975) - used to be Nurmanbetov's business in 2017 and states no current affiliation.
- Nural Logistics LLC (USDOT #3601607) - Nurmanbetov states that he once tried to get this business up and running but never did and he is not actively using this company.
- Two Men and a Moving Van d/b/a Move For Less (USDOT 3073774), UTC Permit HG067981 - Nurmanbetov states he has a 25% interest in the company but did not know the owner, the address, what city it was in, the phone number or whether Lion Movers LLC shared vehicles and drivers with Move For Less.





Part C

On October 1, 2021 a comprehensive safety investigation was conducted by SI Gilbert for Two Men and a Moving Van LLC (UTC Permit THG-67981). Gilbert reports Nurnambetov being present at the time of the investigation as the Co-Governor for the carrier and also as a driver. On June 18, 2024, Cobile sent an email to Nurmanbetov asking for clarification on the carrirer's position for having drive time recorded on the timesheets for Nurmanbetov versus the statement that no driving was ever conducted, Nurmanbetov's response is as follows:

"You know this is my first investigation and of course we can't prepare all documents perfectly! But I know the UTC requirements regarding medical cards and it's very strict! After expiration I didn't drive the truck at all, except that onsite investigation day 06/13/24. I trained Rick for that, to become a driver-forman. And Rick is an employee, why are you asking him? If you have any questions just call me or email me directly."

- The BOLs provided for review by the carrier had Lion Movers LLC at the top of the form, however the UTC permit number, phone number, address, email and website were for Two Men and a Moving Van (UTC permit HG067981). When questioned about this, Nurmanbetov blamed the software company (Elromco) for the informational errors on the BOL forms. SI Cobile called Elromco and confirmed that the carrier information on the BOLs gets populated by the carrier not the software company.

- When discussing the discovered violations with the carrier and providing detailed technical assistance, Nurmanbetov would ask if he was able to correct the violations at the time of investigation to avoid the violations being documented.

- Nurmanbetov provided a driver list as part of the pre-investigation paperwork and identified himself as a driver. SI Cobile discovered a gap in the medical examiners certificate (MEC) for Nurmanbetov between February 3, 2024, through June 9, 2024 where driving would have been in violation of CFR 391.45(a), operating a commercial motor vehicle without a valid MEC. When SI Cobile emailed and called the carrier to verify the drive times between February 3, 2024 and June 9, 2024, Nurmanbetov stated that he didn't drive during that time and that only Rick De Wijs drove. Cobile called Rick De Wijs (June 18, at 12:01 p.m.) to interview the driver regarding actual driving activity and De Wijs stated that Nurmanbetov would drive from time to time for each other if one or the other felt tired, but De Wijs was unable to remember any specific dates. When Cobile questioned the timecards submitted for review that showed drive time for Nurmanbetov during the period the MEC was invalid, Nurmanbetov became defensive and stated that drive time is not a requirement on a timecard, and that he had populated the timecard mirroring the same information as De Wiji's timecard.

DOCUMENTS PROVIDED TO THE CARRIER:

The carrier was provided with one copy of the review, Parts A and B, with requirements and recommendations and the Safety Management Plan (SMP) guidance. The carrier was also provided with a hard copy and an electronic copy of the 2023 guide "Achieving a Satisfactory Motor Carrier Safety Record."

FOLLOW-ON ACTION:

Recommend imposing administrative penalties consistent with the enforcement policy. Recommend the carrier complete and have approved a Safety Management Plan (SMP) and perform compliance inspections within six months to one year should the SMP be approved. Work with the AAG to issue Notice of Intent to Cancel (NOIC).

Amended report changed to show the following:

1. CFR 391.51(b)(2) was changed from discovered two to discovered one. The carrier states driver Rick De Wijs was not originally hired as a driver on September 13, 2022, as recorded by the carrier, but as a helper and only first drove for the carrier on January 1, 2024.
2. CFR 391.51(b)(4) was removed from the final report. Per the carrier, Rick De Wijs did not drive for the carrier until January 1, 2024, therefore there would be no annual driver abstract requirement due in 2023 for this employee.





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Authorized by:		Date:
Uploaded:	Yes	No
Verified by:		Failure Code:
		Date:





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Safety Fitness Rating Explanation

This report lists the facts which were used to determine the Safety Fitness Rating for the above motor carrier. Federal and State violations are combined for rating purposes. However, only the federal or federal equivalent section number is shown below. A check mark identifies the range within which the data fell when determining the Safety Fitness Rating. All information within a FACTOR block relates only to that FACTOR.

FACTOR 1	General (CFR Parts 387, 390)	0 Point = Satisfactory 1 Point = Conditional >1 Point = Unsatisfactory
VIOLATIONS AFFECTING RATING	POINTS	
NONE	-----	
TOTAL POINTS: 0 = SATISFACTORY		

FACTOR 2	Driver Qualification (CFR Parts 382, 383, 391)	0 Point = Satisfactory 1 Point = Conditional >1 Point = Unsatisfactory
VIOLATIONS AFFECTING RATING	POINTS	
NONE	-----	
TOTAL POINTS: 0 = SATISFACTORY		

FACTOR 3	Operational/Driving (CFR Parts 392, 395)	0 Point = Satisfactory 1 Point = Conditional >1 Point = Unsatisfactory
VIOLATIONS AFFECTING RATING	POINTS	
S 395.8(a)(1)	2 (C)	

TOTAL POINTS: 2 = UNSATISFACTORY		

FACTOR 4	Vehicle/Maintenance (CFR Parts 393, 396, Performance Data (OOS%))	
VIOLATIONS AFFECTING RATING	POINTS	Fewer than 3 inspections
NONE	-----	
TOTAL POINTS: 0 = SATISFACTORY		

Fewer than 3 Inspections	3 or more Inspections	
	OOS Less than 34%	OOS 34% or Higher
Rate same as other Regulatory Factors 1, 2, and 3	Satisfactory	Conditional
0 Point = Satisfactory 1 Point = Conditional >1 Point = Unsatisfactory	Conditional	Unsatisfactory
	If a pattern of Non-Compliance with a Critical or an Acute Violation	If a pattern of Non-Compliance with a Critical or an Acute Violation

FACTOR 5	Hazardous Material (CFR Parts 397, 171, 172, 173, 177, 180)
Not Applicable - Not a carrier of Hazardous Material	
NONE	

FACTOR 6	Accident (Recordable Accident Rate)
((Recordable Accidents) X (1 million)) ÷ (Total Miles) = Rate	
(0 X 1,000,000) ÷ 8,000 = 0 = SATISFACTORY	
ACCIDENT RATE	FACTOR RATING
0.000 - 1.500	= Satisfactory
>1.500	= Unsatisfactory



