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BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Determining the Proper  
Carrier Classification of, and Complaint  
for Penalties against:

DOODY, CAMERON, ADAM  
HANEY, MATT PATTERSON, AND  
STEPHEN VLAHOS d/b/a CAMPUS  
BELLHOPS LLC

DOCKET TV-143185

DECLARATION OF  
CAMERON DOODY

Cameron Doody states and declares:

1. I am one of the co-founders of Campus Bellhops LLC. I am over 18 years of age, and competent to testify if called as a witness in this matter. I make the following statements from personal knowledge.
2. In about April 2012, Stephen Vlahos and I founded Campus Bellhops LLC and began providing moving services through student-movers at eight universities in the Southeast.
3. Campus Bellhops has expanded to 121 cities in 42 states. In Washington, students from the University of Washington ("UW") in Seattle, Washington State University ("WSU") in Pullman, and Western Washington University ("WWU") in Bellingham currently provide labor at an hourly rate for household moves.
4. All bookings for Campus Bellhops are handled centrally in Tennessee through our

- 1 website (<https://getbellhops.com/>) or call center. Student-movers cannot book  
2 moves for customers.
- 3 5. Student recruiters at UW, WSU, and WWU may place ads for Campus Bellhops  
4 services on craigslist. All such craigslist ads direct potential customers to book  
5 their moves through the <https://getbellhops.com/> website or the central call center  
6 in Tennessee. All of the Campus Bellhops moves are booked on the company  
7 website or through our call center in Tennessee.
- 8 6. As a company, we also provide promotional discounts through Groupon. Again,  
9 all Groupon bookings occur through the <https://getbellhops.com/> website or our  
10 call center in Tennessee.
- 11 7. When Campus Bellhops started providing moving services in Washington,  
12 customers -- in addition to booking moving labor on an hourly basis -- could select  
13 to have Campus Bellhops rent a moving truck for them from a moving truck rental  
14 company as part of their Campus Bellhops reservation.
- 15 8. Our core business has always been providing labor, not trucks. After several  
16 weeks of internal deliberations about whether to continue to offer to help  
17 customers with truck rental, we made a company-wide decision to discontinue the  
18 truck rental offering in Washington state and in all other states.
- 19 9. On October 8, 2014, Campus Bellhops discontinued providing moving truck  
20 services on a company-wide basis. Attached to my Declaration as **Exhibit 1** is a  
21 true and correct copy of the October 8, 2014 email that Nathan Sexton, Vice  
22 President of Operations, sent announcing the decision to discontinue moving truck  
23 services. This message was sent to all of the student-movers -- the "bellhops" -- in  
24 Washington state. We no longer have any outstanding bookings for moves with  
25 truck rentals in Washington state, and the company provides only labor services.
10. Due to the company's decision on October 8, 2014, to discontinue providing

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anything but labor for moves, we changed our website to inform our customers that we no longer provide moving trucks. Attached to my Declaration as **Exhibit 2** are true and correct copies of a printout and screenshot of our website taken on October 28, 2014, which show our FAQ page at <https://getbellhops.com/the-company>. One of our FAQs asks “Do you provide moving trucks?” The answer on the website states “No, we only provide labor.”

11. We also changed the booking options on our website to state clearly that our customers can only book labor through Campus Bellhops for their moves. Attached as **Exhibit 3** is a true and correct copy of a screenshot of our website ([https://getbellhops.com/reservation/move\\_info](https://getbellhops.com/reservation/move_info)) taken on October 28, 2014, which shows for “Local Move From A to B” that “We do not supply trucks, moving equipment, packing materials or tools with this option ... just good old-fashioned muscle.”

12. Attached as **Exhibit 4** is a true and correct copy of a screenshot of our website ([https://getbellhops.com/reservation/move\\_info](https://getbellhops.com/reservation/move_info)) taken on October 28, 2014, which shows for “Loading Help” that “We do not supply trucks, moving equipment, packing materials or tools with this option ... just good old-fashioned muscle.”

13. Attached as **Exhibit 5** is a true and correct copy of a screenshot of our website ([https://getbellhops.com/reservation/move\\_info](https://getbellhops.com/reservation/move_info)) taken on October 28, 2014, which shows for “Unloading Help” that “We do not supply trucks, moving equipment, packing materials or tools with this option ... just good old-fashioned muscle.”

14. As previously mentioned, student recruiters post craigslist advertisements for Campus Bellhops services in their university city.

15. As has always been the practice of our company, any craigslist advertisement or Groupon promotion for Campus Bellhops directs our potential customers to our website (<https://getbellhops.com/>) or our call center in Tennessee to book their

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moves.

16. Attached as **Exhibit 6** is a true and correct copy of a screenshot taken of a “live” craigslist advertisement for Pullman, Washington (<http://pullman.craigslist.org/lbs/4654025173.html>), on October 29, 2014 (noting it was updated 16 days previously). The craigslist advertisement directs potential customers to book their moves through either 1-888-836-3939 (which is the nationwide Campus Bellhops reservation phone number) or <http://pullmanwashingtonmovers.com/124/1/discount/hartshorn1>. When a customer clicks on the <http://pullmanwashingtonmovers.com/124/1/discount/hartshorn1> address, the customer is automatically directed to [https://getbellhops.com/reservation/move\\_info](https://getbellhops.com/reservation/move_info). As described in paragraphs 10-13, our website and call center do not provide our customers an option to book anything but labor services. We do not provide moving truck services.

17. Attached as **Exhibit 7** is a true and correct copy of a screenshot taken of a “live” craigslist advertisement for Bellingham, Washington (<https://bellingham.craigslist.org/lbs/4716842918.html>), on October 29, 2014 (noting that it was posted 14 days earlier). This craigslist advertisement directs potential customers to book their moves through [www.getbellhops.com](http://www.getbellhops.com) (which is the same as <https://getbellhops.com/>). As described in paragraphs 10-13, our website and call center do not provide our customers an option to book anything but labor services. We do not provide moving truck services.

1 8. At this time, the student recruiters at the University of Washington in Seattle do  
2 not have any craigslist advertisements posted. In the future, any craigslist  
3 advertisement posted by student recruiters at the University of Washington in  
4 Seattle would direct potential customers to book their moves through the [https://  
5 getbellhops.com/](https://getbellhops.com/) website or call center, which do not provide our customers an  
6 option to book anything but labor services. We do not provide moving truck  
7 services.

8 9. At this time, we do not have any Groupon promotions for Washington. In the  
9 future, any Groupon promotion would direct potential customers to book their  
10 moves through the <https://getbellhops.com/> website or call center, which do not  
11 provide our customers an option to book anything but labor services. We do not  
12 provide moving truck services.

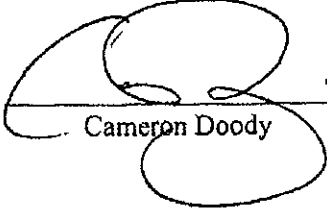
13 20. Campus Bellhops is a young start-up company, and we did not realize that we  
14 needed a permit from the Washington Utilities and Transportation Commission  
15 when we provided our customers the option of renting and providing trucks for the  
16 moves booked in Washington state.

17 21. At this time, Campus Bellhops has no plans to provide moving trucks. Rather, our  
18 plan is to remain a labor-only service. We understand now that if our company  
19 decides in the future to make moving trucks available again to its customers, we  
20 will need to obtain a permit from the Washington Utilities and Transportation  
21 Commission before we provide that service in Washington state.

22 I STATE AND DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF  
23 THE STATE OF TENNESSEE THAT THE FOREGOING IS TRUE AND CORRECT TO  
24 THE BEST OF MY KNOWLEDGE AND BELIEF.

25 DATED this 30<sup>th</sup> day of October, 2014, at Chattanooga, Tennessee.  
DECLARATION OF CAMERON DOODY 5

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Cameron Doody

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DECLARATION OF CAMERON DOODY 6

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