BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

TRANSIT SYSTEMS, INC. d/b/a MOVES FOR SENIORS DOCKET TV-170747

DECLARATION OF JACQUE HAWKINS-JONES

I, JACQUE HAWKINS-JONES, under penalty of perjury under the laws of the state of Washington, declares as follows:

1

I am employed by the Washington Utilities and Transportation Commission (Commission) as a Compliance Investigator in the Consumer Protection Section. As a Compliance Investigator, my responsibilities include conducting investigations regarding the business practices of regulated utility and transportation companies. As part of those duties, I investigate household goods moving companies that may be operating in violation of

2

On February 14, 2020, I was assigned to perform a follow-up investigation in Docket TV-170747 in which the Commission issued Order 04 on March 21, 2018. Order 04 required Transit Systems, Inc., d/b/a Moves for Seniors (TSI d/b/a MFS or Company) to immediately cease operating as a household goods carrier until it first obtains authority from the Commission.

3

In Order 04, the Commission assessed a penalty of \$10,000 against TSI d/b/a MFS, with a \$5,000 portion suspended for two years, and waived thereafter, provided TSI d/b/a MFS (a) pays the remaining \$5,000 portion of the penalty when due, and (b) ceases and

DECLARATION OF JACQUE HAWKINS-JONES - 1

Commission rules.

desists from further operations as a household goods carrier in Washington without first obtaining the required permit from the Commission.

4 On May 11, 2018, TSI d/b/a MFS made a payment of \$5,000 toward the assessed penalty.

5 On March 23, 2020, a search on Department of Revenue's database resulted in no results for Moves for Seniors and a result for Transit Systems, Inc.¹

6 On March 23, 2020, a search on United State Department of Transportation Safety Administration's database resulted in no results for Moves for Seniors and a result for Transit Systems, Inc.²

7 On March 23, 2020, a search on Washington State Secretary of State's database resulted in no results for Moves for Seniors and a result for Transit Systems, Inc.³

8 On March 23, 2020, a search of Commission records produced no record of Transit Systems, Inc. or Moves for Seniors as being a permitted household goods carrier with the Commission.⁴

9 On February 18, 2020, and March 18, 2020, I conducted Internet searches on www.MovesforSeniors.com, www.TSIShipping.com, and www.HolidayTouch.com and found that TSI d/b/a MFS continues to advertise as a household goods carrier on Holiday

¹ See Attachment A for screen captures from Department of Revenue's database, captured on March 23, 2020.

² See Attachment B for results from USDOT Safety Administration database, printed on March 23, 2020.

³ See Attachment C for screen capture from Secretary of State's database, captured on March 23, 2020.

⁴ See Attachment D for screen capture from Commission database, captured on March 23, 2020.

Touch retirement website⁵. The Holiday Touch website says it is proud to partner with Moves for Seniors, a company that specializes in simplifying the senior move experience.

10

I reviewed the Moves for Seniors website and found a "FAQ" link at the bottom of the webpage. Under the question "Do you provide service in my area?" The website states, in part: "Moves for Seniors provides moving services in every state except Alaska at this time."⁶

11

On February 18, 2020, I visited the Transit Systems, Inc. webpage and used the "Get Quote" button to request a quote for a household goods move under an assumed name. I filled out the online form to request a move from Bellingham, Washington, to Olympia, Washington. I included six pieces of furniture and 14 medium sized boxes in my request. I received an email response from Carol Tract, Logistics Specialist, at Transit Systems, Inc. which included a quote for \$1,500.00 for two movers.⁷

12

On March 18, 2020, I visited the website for a Holiday Touch retirement facility located in Olympia, Washington. On the webpage, it advertises Moves for Seniors as a partner to assist with moving into the facility and offers a link which directed me to the Moves for Seniors page on the Holiday Touch retirement website.⁸

13

The Holiday Touch website also includes a video about Moves for Seniors to learn more about the services the company provides.⁹ The video shows an image of a map of the

⁵ See Attachment E for a screen capture of Moves for Seniors' advertisement on Holiday Touch website.

⁶ See Attachment F for a screen capture of Moves for Seniors Frequently Asked Question website, captured on March 19, 2020.

⁷ See Attachment G for a copy of the emailed quote, dated February 18, 2020.

⁸ See Attachment H for a screen capture of Holiday Touch's facility webpage, captured on March 18, 2020.

⁹ See Attachment I for a screen capture of the Moves for Seniors video link on the Holiday Touch's webpage, captured on March 20, 2020.

United States and marks the states with its logo showing where Moves for Seniors provides household goods moving services.¹⁰ Washington is marked in the map.

- 14 On March 20, 2020, I visited the Moves for Seniors website. Located at the bottom of the page, it states: "A division of Transit Systems, Inc.¹¹"
- 15 As of the date of this declaration, Transit Systems, Inc. d/b/a Moves for Seniors has not applied for, nor was granted, a permit to operate in the state of Washington as a household good carrier.
- 16 As of this date, TSI d/b/a MFS has not meet the cease and desist requirements as assessed in Order 04 and I recommend the suspended penalty of \$5,000 be imposed.

DATED this 23rd day of March, 2020, at Olympia, Washington.

¹⁰ See Attachment J for a screen capture of the map from the Moves for Seniors video, captured on March 20, 2020.

¹¹ See Attachment K for a screen capture of Moves for Seniors webpage, captured March 20, 2020.

ATTACHMENT A

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ATTACHMENT B

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| Business Phone: Mail Address: | (215) 687-7896 | Business Fax: | Fax: (800) 228-8131 |
| Mail Phone: | | Mail Fax: | Undeliverable Mail: |

FMCSA Motor Carrier

USDOT Number: 517872 Docket Number: MC261796 Legal Name: TRANSIT SYSTEMS, INC.

DBA (Doing-Business-As) Name



| Rejected Insurances: | | | | | |
|-----------------------|-------|----------------|-----|-----|-----|
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| Policy/Surety Number: | | Coverage From: | \$0 | To: | \$0 |
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FMCSA Motor Carrier

USDOT Number: 517872 Docket Number: MC261796 Legal Name: TRANSIT SYSTEMS, INC.

DBA (Doing-Business-As) Name

Insurance History:



| Form: 84 Policy/Surety Nun Effective Date Fro | | | \$0 To: Disposition: Cancelled | \$10,000 [*] |
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* If a carrier is in compliance, the amount of coverage will always be shown as the required Federal minimum (\$5,000 per vehicle, \$10,000 per occurrence for cargo insurance, \$75,000 for bond/trust fund insurance for brokers and freight forwarders). The carrier may actually have higher levels of coverage.

FMCSA Motor Carrier

USDOT Number: **517872** Docket Number: **MC261796** Legal Name: **TRANSIT SYSTEMS, INC.**

DBA (Doing-Business-As) Name



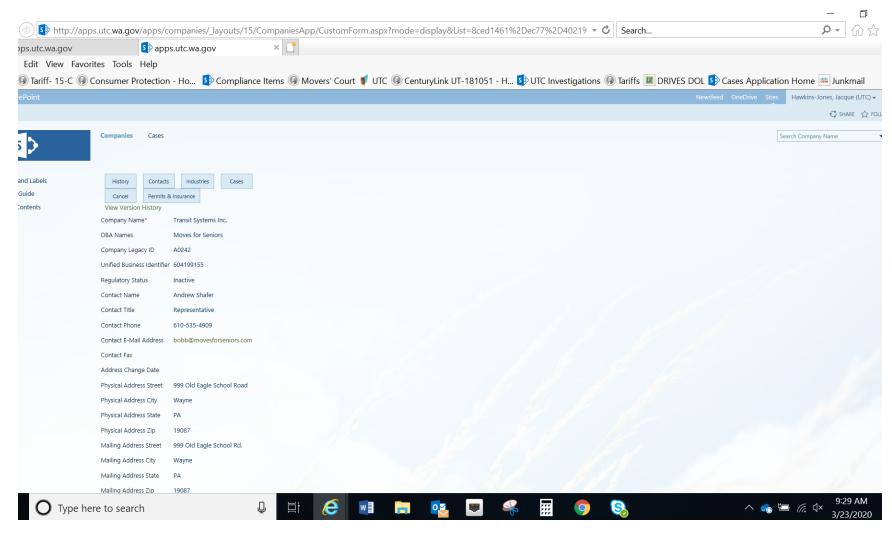
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| | Business Name: TRANSIT SYSTEMS | i, INC. | | UBI Number: 604 199 155 |
| | Business Type: FOREIGN PROFIT | CORPORATION | | Business Status: TERMINATED |
| | Principal Office Street Address: 999 OLD EAGLE St STATES | CHOOL RD STE 114, WAYNE, PA, 19087-1707, UNITE | ED Principal Office | Mailing Address: |
| | Expiration Date: 12/31/2018 | | | Jurisdiction: UNITED STATES, PENNSYLVANIA |
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| | Nature of Business: BROKERAGE OF N | IOVING AND SHIPPING SERVICES | | |
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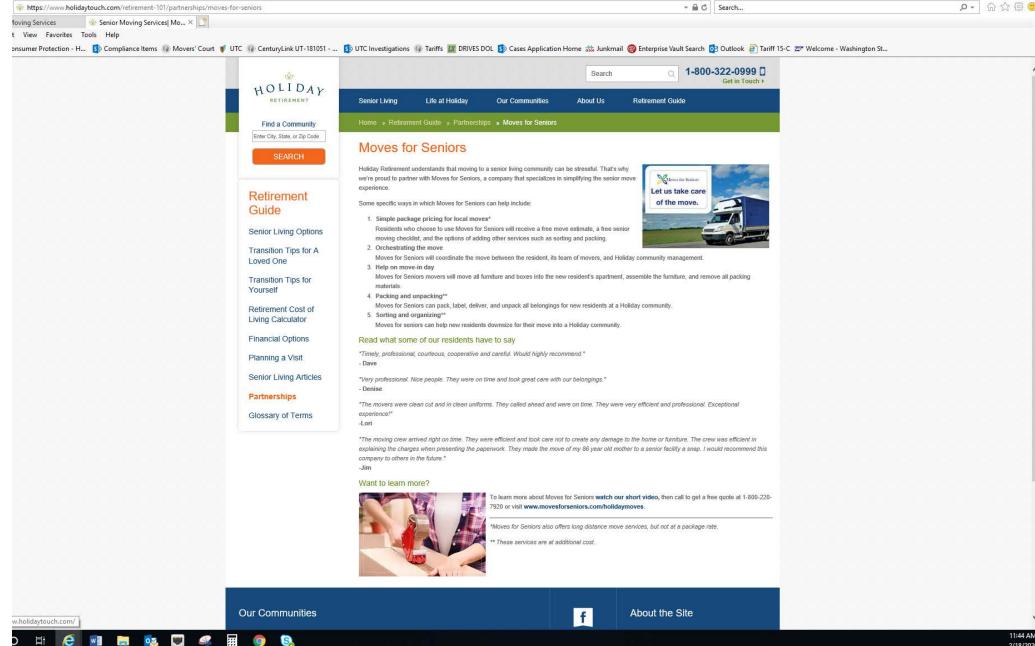
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ATTACHMENT G



Ashley Brown <ashybrown84@gmail.com>

Ashley Brown, Your quote is ready (Going to Olympia; Quote #1303901) 1 message

Carol Tract <carolt@transitsystems.com> Reply-To: carolt@transitsystems.com To: Ashley Brown <ashybrown84@gmail.com> Tue, Feb 18, 2020 at 8:50 AM



Hi Ashley Brown,

I have prepared a price quote for you based on the information you provided. Please call me with any questions, to learn more about our service options, or to book your move or shipment.

Quote is subject to change based on actual inventory and weight.

Regards,

Carol Tract

Logistics Specialist 1-800-626-1257 carolt@TransitSystems.com

If you need boxes or other packing supplies, you can click here.

Quote Details:

Price: \$1500.00

Quote #: 1303901

White Glove Service

Two professional movers will provide inside pickup and inside delivery. They will prepare the furniture items for safe transport. Other services may be available, please contact us for details.

Pickup Location:

Delivery Location:

Bellingham, WA 98225 *Total Miles: 159.28* Olympia, WA 98501

Items:

- 6 Furniture items
- 14 Box / medium (3.1 cubic feet)

Total Estimated Weight: 940.00 LBS

Insurance Information

We strongly recommend you select additional insurance to cover the value of your items. If you do not, federally mandated carrier policies provide a maximum possible payout of 60 cents per pound for White Glove service and 10 cents per pound for Economy service.

Timeframes

Our timeframes are not guaranteed. On average: Economy shipments pickup within 3 business days and deliver within 5 business days of pickup. White Glove shipments pickup within 15 business days of booking and deliver within 20 business days of pickup.

If you've selected a priority pickup, your pickup date will appear in the space below.

Total \$ 1500.00



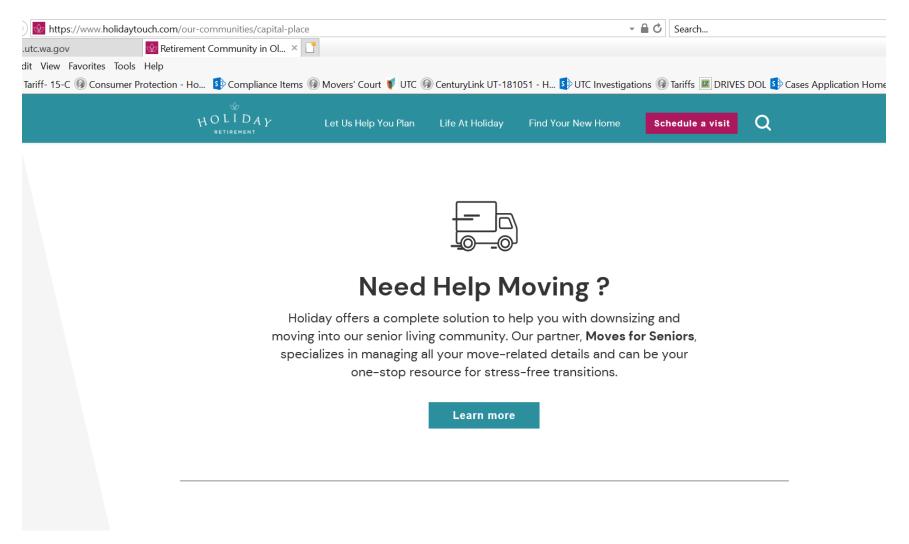
Ready to book? Call us:

1-800-626-1257



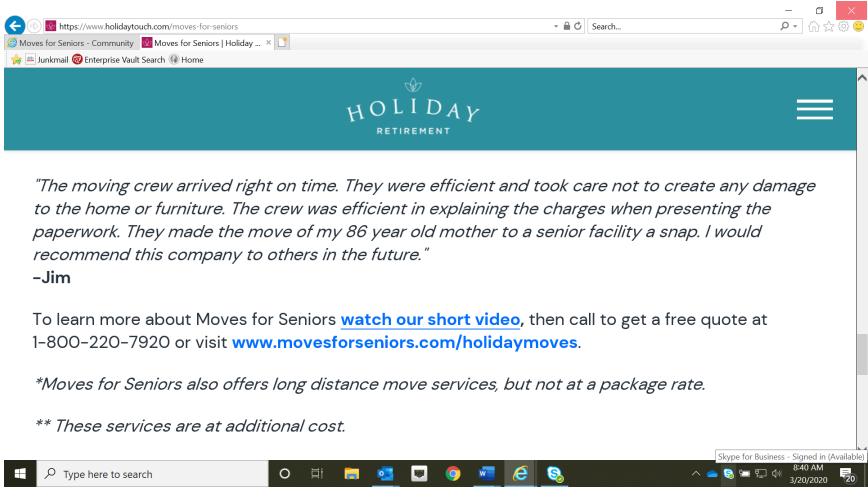
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ATTACHMENT H



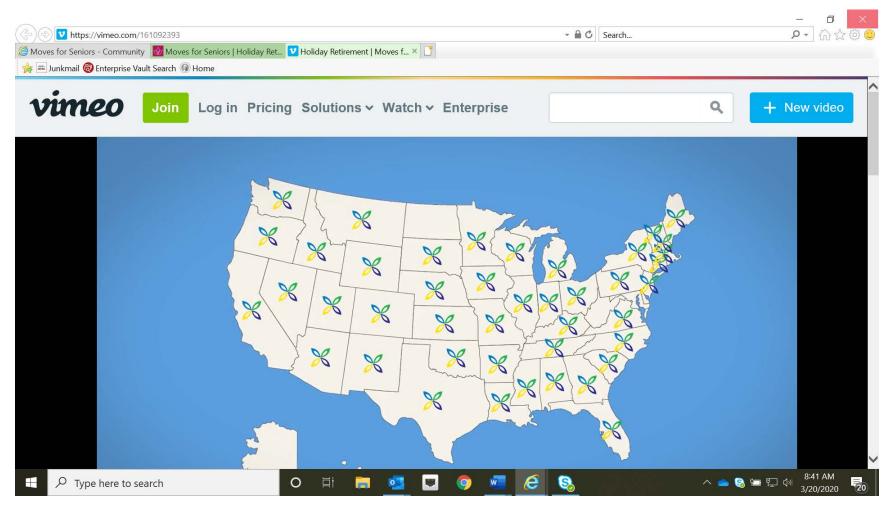
Website screen captured on March 18, 2020.

ATTACHMENT I



Moves for Seniors video – screen captured March 20, 2020.

ATTACHMENT J



Map showing Moves for Senior locations captured from video on March 20, 2020.

ATTACHMENT K

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