BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

DOLLY, INC.

DOCKET TV-171212

DECLARATION OF SUSIE PAUL

Susie Paul, 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 transportation companies that may be operating without the required commission-issued permit or certificate.
- 2. I am familiar with Dolly, Inc., as I was the assigned investigator in Docket TV-171212 in which the Commission issued Order 04 on May 18, 2018. Order 04 required Dolly, Inc., to immediately cease operating as a household goods carrier, common carrier, and solid waste collection company until it first obtains authority from the Commission.
- 3. In Order 04, the Commission ordered Dolly, Inc., to clearly indicate in its web-based application on the Internet and in its advertising on Facebook, Twitter, Pinterest, and any other social media sites or other platforms it uses, or has used to make its services known, that it does not offer or perform services in the state of Washington as a household goods carrier, as a common carrier transporting property other than household goods, or as a solid waste hauler until it first obtains authority from the Commission.
- 4. The Commission assessed a penalty of \$69,000 against Dolly, Inc., with the entire amount suspended until June 30, 2019, subject to the requirement that Dolly, Inc., immediately cease and desist from the operations described, and found unlawful, in Corrected Order 02. In the event that Dolly is found to have continued such operations after the date of the May 18, 2018, Order 04, at any time before June 30, 2019, the full penalty will be due upon notice of that finding to Dolly, Inc.

- 5. On June 15, 2018, and July 10, 2018, I conducted an Internet search on www.Dolly.com and found that Dolly, Inc., continues to advertise as a household goods carrier, common carrier, and solid waste hauler. Dolly's website says the Company's most common "Dollys" are mini and small moves, apartment moves, Craigslist & Offerup Pick-Up and Delivery, Storage Moves, and Junk Removal.
- 6. On June 15, 2018, and July 10, 2018, I reviewed the "Cities" tab on Dolly's website. The webpage states "Cities With Dolly. More coming soon!" Included on this webpage is a map of the United States with Seattle, Washington, as a city in which Dolly operates.²
- 7. On June, 15, 2018, I conducted an Internet search for the Seattle, Washington area on Yelp for Dolly, Inc. I found recent reviews for Dolly, Inc. The most current review was from a consumer in Seattle, Washington, and the review was dated the same day as my search, June 15, 2018. The review stated:

Sent out 2 guys and I am helping them. I am lifting a heavy object (undisclosed to protect the innocent), and the first guy is just standing there while the driver is wasting time putting on his gloves. I told the first guy to help out and then had to tell the second guy to help out. Next time, I won't help. So lazy and unhelpful. Last time my client used them, they showed up an hour late and their extra fellow didn't show, even after waiting a extra half hour so he never showed up in an hour and a half late. Finally helped the driver myself. They could use some quality control and some real movers, not a bunch of lazy deadbeats. What ever you do, don't help them out.

- 8. On June 15, 2018, I sent an email through Yelp to the consumer who wrote the review. On June 18, 2018, the consumer responded to me by email and wrote that he runs a non-profit business. This consumer had recommended Dolly to the buyer of a hospital bed. The buyer is the one who paid Dolly for the service. The Dolly service was conducted on June 10, 2018, around noon.³
- 9. On June 15, 2018, I reviewed a second review on Yelp from a consumer from Redmond, Washington. The review was posted on May 31, 2018. The review stated:
 - a. I am very disappointed in the service I received from Dolly and cannot recommend them. Their customer service has been very unresponsive. The movers managed to drop my armoire down a flight of stairs. Not only did this damage the armoire but also the wood floors where it landed. Additionally, the walls around the stairs and the banisters were damaged. Accidents happen. However, Dolly has been very slow to process my claim, and now will not provide an update on status of those various insurance claims, having

¹ See Attachment A for a screen capture of Dolly, Inc.'s website, printed on June 15, 2018.

² See Attachment B for screen captures of Dolly, Inc.'s website specific to "Cities,' printed on June 15, 2018.

³ See Attachment C for a copies of Dolly's Yelp reviews, printed on June 15, 2018.

not answered messages for over two weeks. I would like them to actually respond in a timely fashion and actually settle as I am currently out of pocket by a significant amount of money.

b. Clare K., of Dolly's business customer service, responded to the consumer on June 1, 2018, and stated that she was sorry to hear about this experience. She further stated:

Although damage claims to this magnitude are rare, we do take them very seriously when they happen and oftentimes this process takes a little longer than most due to having to reach out to multiple people. We truly appreciate your patience and understanding whilst we process this claim and I have personally followed up with an update today. We hope that we can get this resolved very soon and to your satisfaction.

- c. On July 5, 2018, this consumer filed an informal complaint with the Commission.⁴ As of the date of this declaration, the informal complaint is still open.
- 10. On June 18, 2018, I purchased a SoundTransit train ticket from Lakewood, Washington to Sumner.⁵ I boarded the first car of the train on the same date and went through to the lower level of the second car. The car had a Dolly advertisement. I continued through the lower levels of the remaining cars (seven total) and found six advertisements for Dolly.⁶ The advertisements were located in cars 111B, 206B, 209B, 236B, 107B, and 228B.
- 11. On June 18, 2018, and July 10, 2018, I conducted searches using the key words "Dolly movers" and found Dolly's Facebook page. Dolly lists its location as 901 5th Ave., Seattle, WA and depicts a map with Dolly's location pinpointed. There was no language on Dolly's Facebook page that indicates Dolly does not offer or perform services in the state of Washington as a household goods carrier, as a common carrier transporting property other than household goods, or as a solid waste hauler.
- 12. On June 19, 2018, and July 10, 2018, I conducted searches of Dolly's Twitter page. An article provides a link for Dolly's service area which directs the reader to a page that is titled "Book A Dolly," which includes how to book a Dolly, a map of the service area, a list of Seattle neighborhoods Dolly serves, and a solicitation for hiring Helpers. There was no language visible on Dolly's Twitter account that indicates Dolly does not offer or perform services in the state of Washington as a household goods carrier, as a common carrier transporting property other than household goods, or as a solid waste hauler.

⁴ See Attachment D for a redacted summary of informal complaint CAS-232697-F6H5C3, filed July 5, 2018.

⁵ See Attachment E for a copy of a SoundTransit train ticket, purchased for June 18, 2018.

⁶ See Attachment F for copies of Dolly's advertisements found on SoundTransit train on June 18, 2018.

⁷ See Attachment G for a screen capture of Dolly's Facebook page, printed June 18, 2018.

⁸ See Attachment H for a screen capture of Dolly's Twitter page, printed June 19, 2018.

13. On July 10, 2018, I again reviewed Dolly's Facebook page and found a photograph that was posted by Dolly on June 22, 2018. The photograph shows two people wearing shirts with the Dolly Logo behind a truck with a Dolly advertisement that says "Truck and Muscle Anytime You Need It." The article has a link: http://bit.ly/2liQguT.9 The link routed me to Dolly's Instagram page.

The Instagram page has the same photograph, but shows more detail, including the truck's Washington State license plate. 10

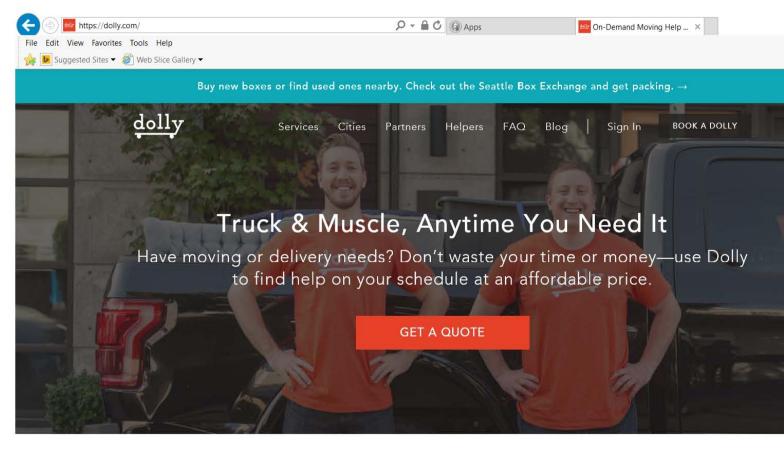
DATED this 12th day of July, 2018, at Olympia, Washington.

SUSIE PAUL

⁹ See Attachment I for a screen capture of Dolly's Facebook page, printed July 10, 2018.

¹⁰ See Attachment J for a screen capture of Dolly's Instagram page, printed July 10, 2018.

Attachment A







The Dolly Difference



Trustworthy Help

All Dolly Helpers are independent contractors who are background checked, reviewed, and backed by a commercial insurance policy.

On Your Schedule

We think 4-hour delivery windows suck, too. So we don't have them. You set the time—your Helper will be there.

Guaranteed Pricing

Find out the cost of your Dolly upfront before you book—no surprises! Pay, tip, and review in the app or <u>online</u>.

Save Time & Your Back

No need to rent a truck from U-Haul where you haul everything on your own. Dolly Helpers do the driving and heavy lifting for you.

How to Book a Dolly

STEP #1

Enter Your Details

Tell us when, where, and what you need help with.

STEP #2

Get Your Price

Select one or two Helpers and get an instant, guaranteed price.

STEP #3

Book Your Dolly

Get connected to and scheduled with a Helper in minutes.





If you need help, especially in lifting or moving something that's too heavy for you, just call Dolly!

- Brittny, Seattle





Cities With Dolly

More coming soon!





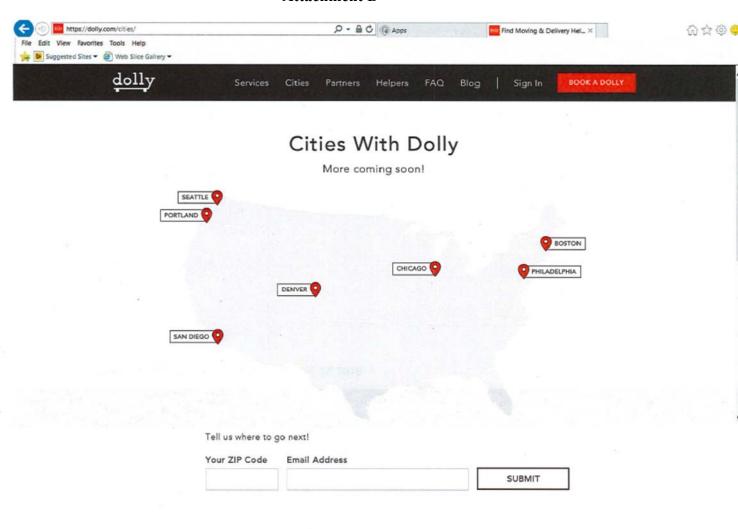
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	Email A	Address	SUBSCRIBE	
	og reers ntact Us	Services Cities Partners Helpers		BOOK A DOLLY Download on the App Store SET IT ON Google Play
©20	018 Dolly Terms Priv	/acy		f 💆 💿 👂

Screen capture of Dolly, Inc., website, printed on June 15, 2018

Attachment B

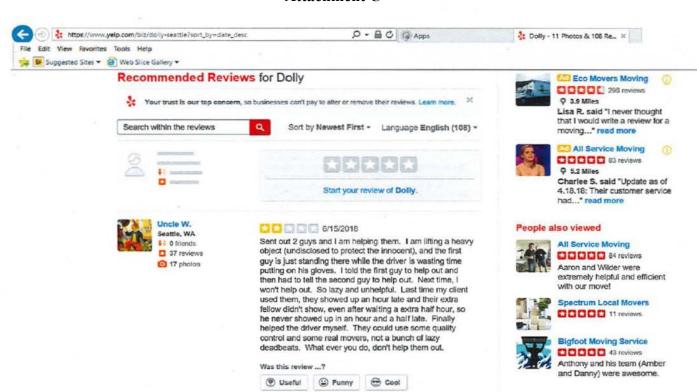




Screen capture of Dolly website "Cities" tab, printed on June 15, 2018

Attachment C

0





★ ★ ★ ★ 6/6/2018

Excellent, no hassle service. Dolly picked up my craiglist item from the seller and brought to my home, without me being there. Great app.

Was this review ...?

③ Useful ② Funny ⊕ Cool



5/31/2018

I am very disappointed in the service I received from Dolly and cannot recommend them. Their customer service has been very unresponsive.

The movers managed to drop my armoire down a flight of stairs. Not only did this damage the armoire but also the wood floors where it landed. Additionally, the walls around the stairs and the banisters were damaged.

Accidents happen. However, Dolly has been very slow to process my claim, and now will not provide an update on status of those various insurance claims, having not answered messages for over 2 weeks.

I would like them to actually respond in a timely fashion and actually settle as I am currently out of pocket by a significant amount of money.





Comment from Clare K. of Dolly Business Customer Service

6/1/2018 - Hello Liam, I am so sorry to hear about this experience.

Although damage claims to this magnitude are rare, we do take them very seriously when they happen and oftentimes this process takes a little longer than most due to having to reach out to multiple people. We truly appreciate your patience and understanding whilst we process this claim and I have personally followed up with an update today.

We hope that we can get this resolved very soon and to your satisfaction.

Clare-Dolly Support Read less

Assembling services

Large and heavy item moving

Local moving

People found Dolly by searching for...

Moving Company Seattle

Furniture Mover Seattle

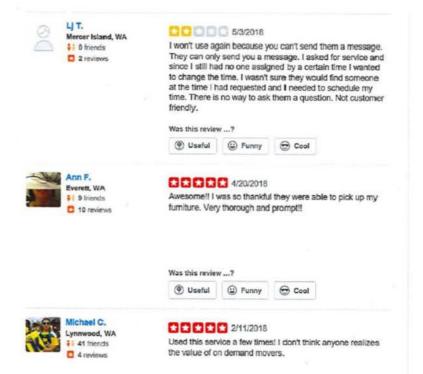
Furniture Delivery Service Seattle

Near Me

Large & Heavy Item Moving Near Me

Movers Near Me

Residential Junk Removal Near Me



Dolly Yelp reviews, printed June 15, 2018

Attachment D

Washington State Complaint: CAS-23297-F6H5C3

Company: Dolly, Inc.
Industry:
Customer:
Alt Contact:
Account Number:
Service Phone:
E-mail Address: @hotmail.com
Service Address: Seattle King County Washington 98119
Complaint: CAS-23297-F6H5C3
Type: Complaint
Serviced By: Sheri Hoyt
Grouped By: Customer Service
Opened On: 7/5/2018, 2:28:00 PM
Closed On:
Disposition: In Progress
Violations Total: 0
TA Total: 0
Amount Customer Saved:
Description:

The customer has an unresolved damage claim with Dolly, Inc. (Dolly), an unpermitted household goods carrier that performed an intrastate household goods move (an armoire and filing cabinets) for him on April 7, 2018. The customer said he purchased damage protection from Dolly for \$15. The purchase gave him up to \$1,800 of protection.

During the move, Dolly dropped the armoire down a flight of stairs, damaging not only the armoire but the banister, the wall, and the hardwood floors. The customer was a tenant, not the home owner, and had to pay for the damage himself to a cost of approximately \$5,000.

Although Dolly has acknowledged its responsibility, it has not mailed him the \$1,800 check it offered, and he said to send, nor will it address reimbursing him the \$5,000 for the repairs to the home he moved out of; Dolly calls those damages "environmental damages." The customer said Dolly has been completely non-responsive for two weeks now.

*Please provide a response to the complaint and all documentation for this customer's move, including but not limited to: the written estimate, inventory form, bill of lading, the customer's claim form, and all correspondence with the customer. Please provide both sides of all two-sided documents.

7/6/2018, 10:18 a.m.) passed to Dolly, Inc. via email. Response due 7/13/2018 by 5 p.m.

р.ш.	
Result:	
	Violations
There are no violations for this case.	

Activities

Activity Type: Activity

Activity Date: 7/5/2018, 3:45:00 PM

Contact:

Subject: Email from customer

Attachments: 1

Description:

-SEE ATTACHMENT-

Activity Type: Activity

Activity Date: 7/5/2018, 3:51:00 PM

Contact:

Subject: Email from customer

Attachments: 2

Description:

-SEE ATTACHMENT-

Activity Type: Activity

Activity Date: 7/5/2018, 3:53:00 PM

Contact:

Subject: Email from customer

Attachments: 1

Description:

-SEE ATTACHMENT-

Activity Type: Activity

Activity Date: 7/5/2018, 3:53:00 PM

Contact: Subject: Email from customer Attachments: 2 Description: -SEE ATTACHMENT-**Activity Type: Email** Activity Date: 7/5/2018, 4:15:35 PM To: l @hotmail.com; From: sheri.hoyt@utc.wa.gov Subject: WA UTC Complaint CAS-23297-F6H5C3 for Liam Foley **CRM:0023896 Attachments: 0 Body:** Hi Thank you for the additional information. I'll get back to you as soon as I have information to provide. Regards, Sheri **Activity Type: Email** Activity Date: 7/5/2018, 8:58:44 PM To: sheri.hoyt@utc.wa.gov; @hotmail.com From: l

Subject: Re: WA UTC Complaint CAS-23297-F6H5C3 for

CRM:0023896

Attachments: 0

Body:

Much appreciated!

> On Jul 5, 2018, at 4:15 PM, Hoyt, Sheri (UTC) < sheri.hoyt@utc.wa.gov> wrote:

> > Hi

> Thank you for the additional information. I'll get back to you as soon as I have information to provide.

> Regards, > Sheri

Activity Type: Email

Activity Date: 7/6/2018, 10:18:29 AM

To: mike@dolly.com;

From: sheri.hoyt@utc.wa.gov

Subject: WA UTC Complaint CAS-23297-F6H5C3 for

CRM:0023902

Attachments: 0

Body:

New complaint

Please let me know if you have any questions.

Regards,

Sheri

Sheri Hoyt

Investigator 3

(360) 664-1102 Office

(360) 664-4291 Fax

Email: sheri.hoyt@utc.wa.gov

Utilities and Transportation Commission

Respect. Professionalism. Integrity. Accountability.

www.utc.wa.gov

Washington UTC Complaint CAS-23297-F6H5C3

Company: Dolly, Inc.

Customer:

Account #: Contact:

Service Address:

Seattle Washington 98119

Primary Phone: Secondary Phone:

Email Address: @hotmail.com

Complaint Information:

Complaint ID: CAS-23297-F6H5C3

Serviced By: Sheri Hoyt

Opened On: 7/5/2018 2:28 PM Grouped By: Customer Service

Description:

The customer has an unresolved damage claim with Dolly, Inc. (Dolly), an unpermitted household goods carrier that performed an intrastate household goods move (an armoire and filing cabinets) for him on April 7, 2018. The customer said he purchased damage protection from Dolly for \$15. The purchase gave him up to \$1,800 of protection.

During the move, Dolly dropped the armoire down a flight of stairs, damaging not only the armoire but the banister, the wall, and the hardwood floors. The customer was a tenant, not the home owner, and had to pay for the damage himself to a cost of approximately \$5,000.

Although Dolly has acknowledged its responsibility, it has not mailed him the \$1,800 check it offered, and he said to send, nor will it address reimbursing him the \$5,000 for the repairs to the home he moved out of; Dolly calls those damages "environmental damages." The customer said Dolly has been completely non-responsive for two weeks now.

*Please provide a response to the complaint and all documentation for this customer's move, including but not limited to: the written estimate, inventory form, bill of lading, the customer's claim form, and all correspondence with the customer. Please provide both sides of all two-sided documents.

7/6/2018, 10:18 a.m.) passed to Dolly, Inc. via email. Response due 7/13/2018 by 5 p.m.

Activity Type: Phone Call

Activity Date: 7/6/2018, 10:21:00 AM

Direction: Outgoing

Customer:

UTC POC: Sheri Hoyt

Subject: Called Michael Howell

Description:

I called Mike Howell and identified myself and the purpose of my call. I briefly explained that I've passed to his email address, mike@dolly.com, an informal complaint to which he will need to respond within five business days. I said that the email provided the complaint detail and requests specific information be provided. I told him my contact information is included so he can contact me should he have any questions. I also advised him the response should be in line with that email or, at the very least, I would appreciate it if he copied/pasted the subject line to a fresh email so the email has no trouble returning to my complaint database. He said he understood and that he's not at work right now but he'll take a look when he can and get back to me as soon as he can. I told him that's fine, he has five business days to respond and all that information is in the email I just sent a minute ago. He said okay and the call ended.

Activity Type: Phone Call

Activity Date: 7/9/2018, 1:07:00 PM

Direction: Incoming

Customer: Armikka Bryant

UTC POC: Sheri Hoyt

Subject: **Armikka Bryant called**

Description:

Mr. Bryant called and left a message that he was calling about the Dolly complaint. He was calling to give me "an update where we are on the complaint." Mr. Bryant said they hope to resolve it in the next couple of weeks, they've been waiting on information from the customer for Dolly's insurance company. He will explain further in his response and will also send an email within the week.

Activity Type: Email

Activity Date: 7/9/2018, 5:41:03 PM

To: sheri.hoyt@utc.wa.gov;

From: armikka@dolly.com

Subject: Re: WA UTC Complaint CAS-23297-F6H5C3 for

CRM:0023902

Attachments: 0

Body:

Hi Sheri,

I am following-up the voicemail I left earlier today informing you that I will forward you our initial response by the end of the week.

Cheers, Armikka

Armikka Bryant

Dolly | Director of Legal and Government Affairs 901 Fifth Avenue Suite 600 Seattle, WA 98104-3188 646.303.3533 armikka@dolly.com

dolly.com

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On Fri, Jul 6, 2018 at 10:24 AM, Mike Howell < mike@dolly.com > wrote:

A — Please take the lead in responding.

Michael Howell (from my phone)

Dolly | CEO 425.443.0554 mike@dolly.com dolly.com

Begin forwarded message:

From: "Hoyt, Sheri (UTC)" < sheri.hoyt@utc.wa.gov>

Date: July 6, 2018 at 10:18:33 AM PDT **To:** "Dolly, Inc." < mike@dolly.com>

Subject: WA UTC Complaint CAS-23297-F6H5C3 for

CRM:0023902

New complaint

Please let me know if you have any questions.

Regards, Sheri

Sheri Hovt

Investigator 3

(360) 664-1102 Office

(360) 664-4291 Fax

Email: sheri.hoyt@utc.wa.gov

Utilities and Transportation Commission

Respect. Professionalism. Integrity. Accountability.

www.utc.wa.gov

Washington UTC Complaint CAS-23297-F6H5C3

Company: Dolly, Inc.

Customer:

Account #:
Contact:

Service Address:

Seattle Washington 98119

Primary Phone: Secondary Phone:

Email Address: 1 @hotmail.com

Complaint Information:

Complaint ID: CAS-23297-F6H5C3

Serviced By: Sheri Hoyt

Opened On: 7/5/2018 2:28 PM Grouped By: Customer Service

Description:

The customer has an unresolved damage claim with Dolly, Inc. (Dolly), an unpermitted household goods carrier that performed an intrastate household goods move (an armoire and filing cabinets) for him on April 7, 2018. The customer said he purchased damage protection from Dolly for \$15. The purchase gave him up to \$1,800 of protection.

During the move, Dolly dropped the armoire down a flight of stairs, damaging not only the armoire but the banister, the wall, and the hardwood floors. The customer was a tenant, not the home owner, and had to pay for the damage himself to a cost of approximately \$5,000.

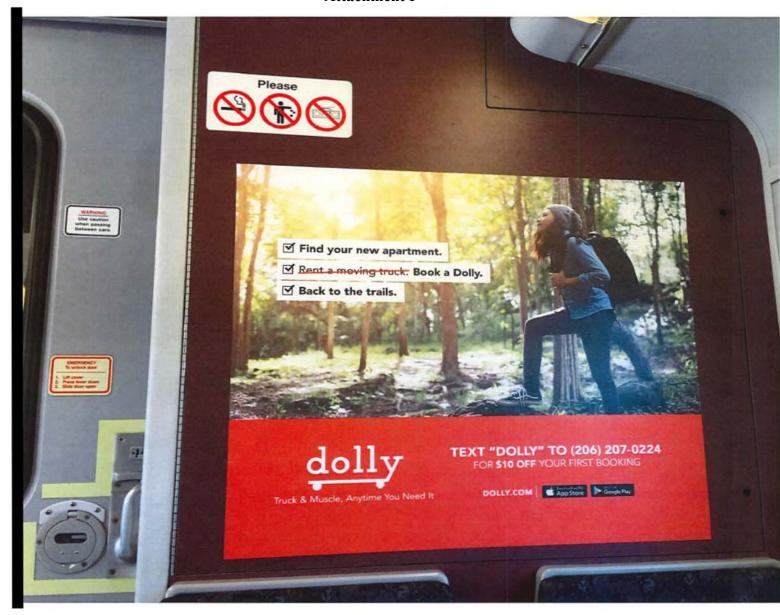
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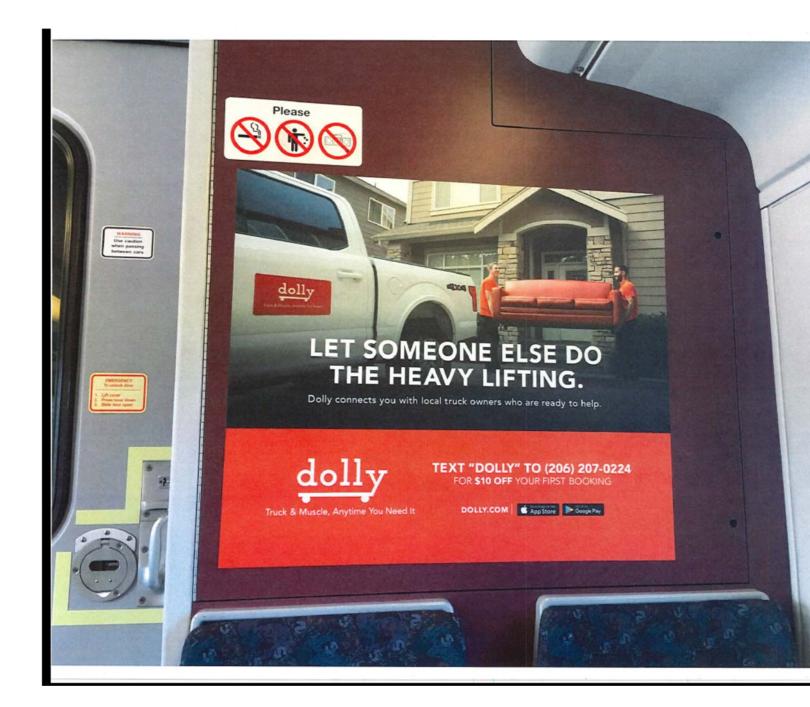
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7/6/2018, 10:18 a.m.) passed to Dolly, Inc. via email. Response due 7/13/2018 by 5 p.m.

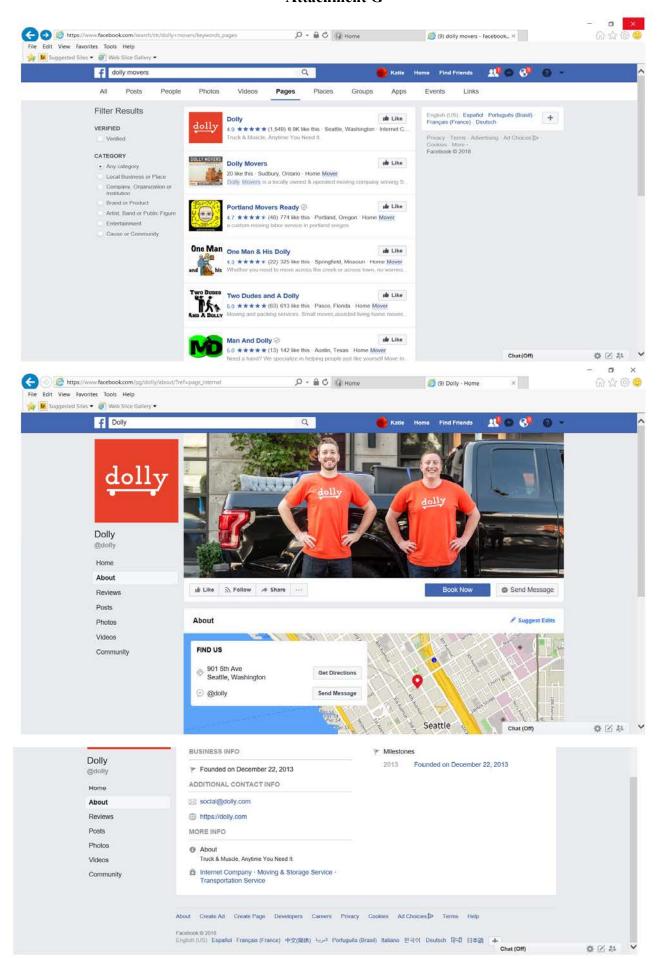


Attachment F

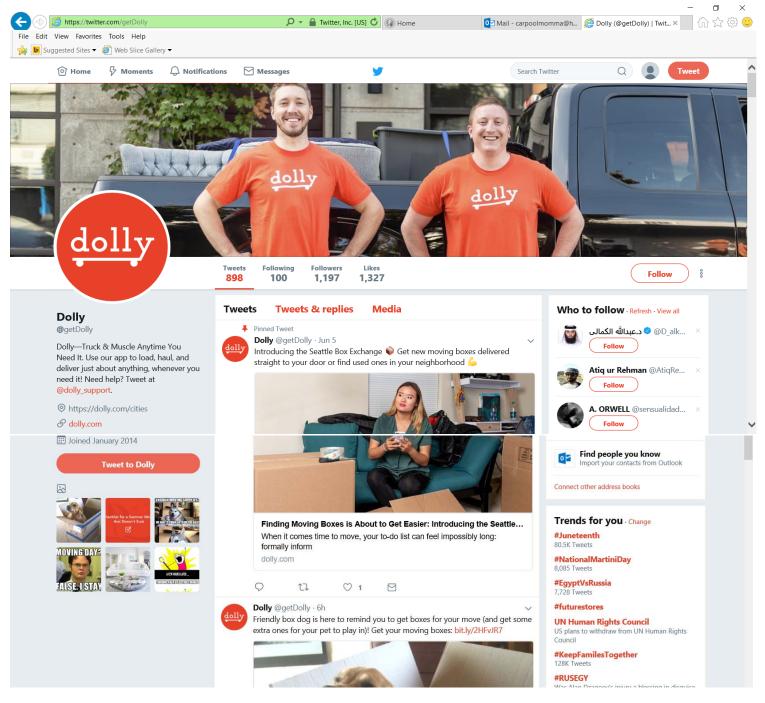




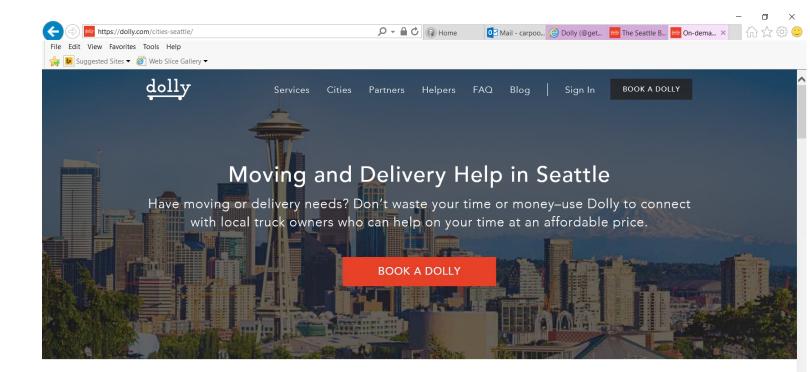
Attachment G



Attachment H



Dolly's Twitter Page, printed June 19, 2018



The Perfect Alternative to Traditional Moving Companies & Delivery Services in Seattle



Affordable

Find out the cost of your Dolly upfront before you book—no surprises!



Convenient

You set the time, and your Helper will be there. Book for today, or next month. It's up to you.

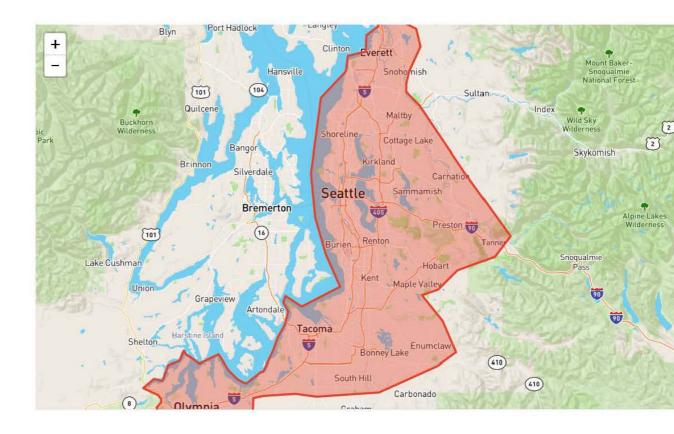


Safe

All Dollys are backed by our <u>Damage</u>

<u>Protection</u> program and commercial

liability insurance.



Estimate Your Moving Costs

Simply enter your pickup and drop-off location and the number of items you plan to move. This is an estimated price and is subject to change when adding more items, details, and options.

Pick-up Location	
Drop-off Location	
Number of Items	
1	GET ESTIMA

BOOK A DOLLY

Find Moving Services Around the Seattle Metro Area



New patio table from Costco, but not sure how to get it to Capitol Hill? Connect with a Helper.



Lease ending in Bellevue and need help moving stuff? Reach out to Dolly.



Is the closest Goodwill too far from Issaquah Helpers will get your donations there.



Live in Tacoma but need to pick up that Craigslist find in Shoreline? Use Dolly, find help.

A Few of the Neighborhoods We Serve:

Ballard

Bellevue

Belltown

O Capitol Hill

O Downtown

Oueen Anne

Tacoma

West Seattle

Kirkland

Overlake

Redmond

South Lake Union

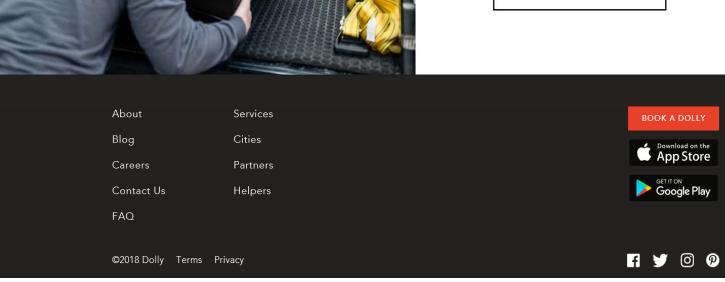


Want a side gig? Earn up to \$1,000 a week with Dolly!

Help Seattleites haul their stuff in and around the city. Work with Dolly as an independent contractor. Our service is about people helping people. Feel good knowing that you're helping your neighbors with work they couldn't do on their

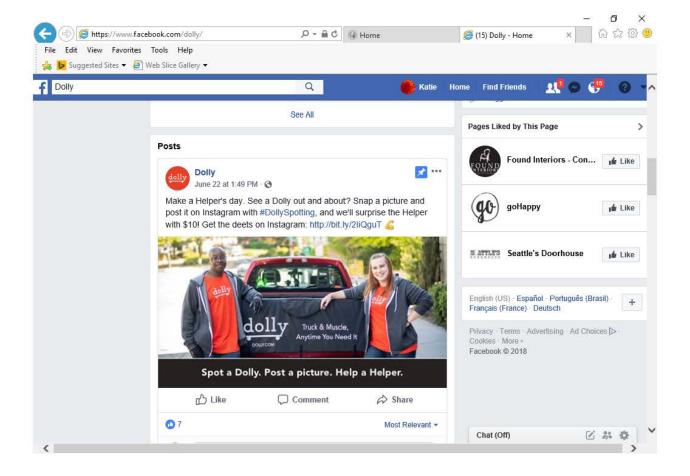
own.

BECOME A HELPER



Pinned tweet on Twitter for Seattle Box Exchange, Seattle service area, printed on June 19, 2018

Attachment I



Attachment J

