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SUPERIOR COURT OF WASHINGTON
FOR KING COUNTY

THE STATE OF WASHINGTON AND
THE WASHINGTON UTILITIES
AND TRANSPORTATION
COMMISSION,

Plaintiffs,

v.

MAUROU, SANI d/b/a SEATAC
AIRPORT 24 aka
SEATACAIRPORT24.COM aka
EXPRESS ONE aka
SHUTTLEEXPRESS24.COM aka SANI
& PARTNERS,

Defendant.

NO.

DECLARATION OF MICHAEL
TURCOTT

I, MICHAEL TURCOTT, hereby declare under penalty of perjury under the laws of the
state of Washington that the following is true and correct:

- 1 1. I am, and at all times hereinafter mentioned have been, a citizen of the United States,
2 over the age of 18, have personal knowledge regarding the matters stated herein, and
3 am competent to testify as a witness.
- 4 2. I am employed by the Washington Utilities and Transportation Commission
5 (“Commission”) where I have worked as an Investigator in the Transportation Division
6 since October 1, 2015. As an Investigator, my responsibilities include conducting
7 investigations of companies that may be operating in violation of Commission rules or
8 State statutes enforced by the Commission. As part of those duties, I investigate
9 companies that appear to be conducting auto transportation operations without the
10 required Commission certificate.
- 11 3. On October 10, 2014, in Docket TC-140399, the Commission granted the application
12 of Mr. Sani Maurou d/b/a SEATAC AIRPORT 24 aka SEATACAIRPORT24.COM
13 aka EXPRESS ONE aka SHUTTLEEXPRESS24.COM aka SANI & PARTNERS
14 (“Mr. Maurou” or the “Company”) to operate as an auto transportation company and a
15 charter party and excursion service carrier with Certificate Number C-65615.
- 16 4. In Consolidated Dockets TC-152296, TC-160187, and TC-160324, the Commission
17 found that the Company had violated the safety regulations enforced by the
18 Commission, that the Company had failed to remedy the cause of the safety violations,
19 cancelled the Company’s authority to operate, ordered the Company to cease and desist
20 all auto transportation operations, and then, ultimately, denied the Company’s
21 application for reinstatement of its authority on July 14, 2016, in Order 03 in
22 Consolidated Dockets TC-152296 and TC-160187 and Order 01 in Consolidated Docket
23

1 TC-160324, Order of Consolidation; Initial Order Denying Application for
2 Reinstatement; Suspending Penalties (hereinafter "Order 03").

3 5. I have been involved with the investigation and the matters concerning the Company,
4 on behalf of Commission Staff (hereinafter "Staff"), since January 2016.

5 6. On September 20, 2016, I searched the database of the Washington State Department of
6 Revenue for businesses associated with Mr. Maurou. I discovered six businesses:

7 EXPRESS ONE; EXPRESS ONE; EXPRESS ONES; SANI & PARTNERS; SEATAC
8 AIRPORT 24; and, SHUTTLEEXPRESS24.COM. The governing person for these

9 businesses is listed as "MAUROU, SANI." The unique business identifier (hereinafter
10 "UBI") for these businesses was the same: 601938365. A true and correct copy of the

11 Washington State Department of Revenue State Business Record for businesses

12 associated with Mr. Maurou, as of September 20, 2016, is attached to my declaration as

13 Exhibit A. Upon further investigation of the Department of Revenue's records for the

14 "SEATAC AIRPORT 24" business listed in the record, I discovered that Mr. Maurou

15 also uses another registered trade name, which was not listed in the business license

16 lookup: "SEATACAIRPORT24.COM."

17 7. Also on September 20, 2016, I searched the database of the Washington state

18 Department of Revenue for the UBI, 601938354. The record I discovered indicated a

19 single entity name: "MAUROU SANI." The record also indicated a single business

20 name: "SEATAC AIRPORT 24." The record also indicated a single address: "1800 S

21 JACKSON ST APT 211, SEATTLE, WA 98144-2181." And the record indicated a

22 single entity type "SOLE PROPORJETOR." A true and correct copy of the Washington
23

1 State Department of Revenue State Business Records Database Detail for UBI number
2 601938365, as of September 20, 2016, is attached to my declaration as Exhibit B.

3 8. I was contacted by the Street Enforcement Team in the City of Seattle's Regulatory
4 Compliance and Consumer Protection Division (hereinafter "RCCP") in August
5 regarding the operations of the Company. On both August 17, 2016, and August 31,
6 2016, RCCP contacted to me to share reports of RCCP's investigators reporting on auto
7 transportation operations by the Company. The reports were of trips provided by the
8 Company to investigators with RCCP on July 25, 2016, and August 30, 2016,
9 respectively.

10 9. One of the reports shared with me by RCCP contained an identifying license plate
11 number of the vehicle in which one of the investigators had been transported by the
12 Company. The identified license plate number was B66765Y. I searched the
13 Washington State Department of Licensing database for the vehicle registration
14 associated with this license plate number on October 17, 2016. According to the record
15 of the Department of Licensing, the vehicle with the license plate number B66765Y is
16 registered as a white 2013 Ford Econo in the "for hire" use class. It is registered to
17 "MAUROU, SANI M" at the address "1800 S JACKSON ST 211, SEATTLE, WA
18 98144." A true and correct copy of the vehicle registration for vehicle with license plate
19 number B66765Y, as of October 17, 2016, is attached to my declaration as Exhibit C.

20 10. After the issuance of Order 03, I also investigated the Company's advertising of its auto
21 transportation operations, namely, the advertising that constitutes engaging in the
22 business of a charter party and excursion service carrier.

- 1 11. On August 19, 2016, I visited the Company's website located at
2 "www.SeatacAirport24.com." It displayed the following advertisement on its webpage:
3 "Find Transportation To/From Any Airport, for Any Venue, Transfers from point A to
4 point B...etc Let us know." The webpage also indicated that the Company would
5 provide service between the Seattle-Tacoma International Airport and the Westin in
6 downtown Seattle, the Snoqualmie Casino, and the Best Western Sky Valley Inn in
7 Monroe, along with "other Charter services." A true and correct copy of the Company's
8 website as I viewed it on August 19, 2016, is attached to my declaration as Exhibit D.
- 9 12. On October 17, 2016, I visited the Company's website again. The "shared ride rate"
10 section of the Company's website located at
11 "www.seatacairport24.com/shared_ride_rate" advertised prices that it offers for
12 transportation from particular cities. On this same webpage, the Company also
13 advertised "*Seatac Airport Service*" and "*Charter Service.*" A true and correct copy of
14 the "shared ride rate" section of the Company's website as I viewed it on October 17,
15 2016, is attached to my declaration as Exhibit E.

16 DATED this 21 day of October, 2016, at Olympia, Washington.

17
18 
19 MICHAEL TURCOTT



My DOR

BUSINESS LICENSE LOOKUP

Clear search Search

Search for business license endorsements issued through the Washington State Business Licensing Service.

General search

Trade name search

Governing people search

Last name or
Business name
First name



Street address



City

County

OTHER RESOURCES

- [Professional Licenses \(DOR\)](#)
- [Contractor, Electrician, or Plumber \(I & I\)](#)
- [Business Records \(DOR\)](#)
- [Corporations Registration Data \(SOS\)](#)
- [Health Care Provider Credential \(DOH\)](#)
- [Worker's Comp Premium Status \(I & I\)](#)
- [Suspect Fraud \(DOR\)](#)

RESULTS

Business Name	Governing person	UBI	Business ID	Location ID	City	State
EXPRESS ONE	MAUROU,SANI	601-938-365	001	0005	SEATTLE	WA
EXPRESS ONE	MAUROU,SANI	601-938-365	001	0003	SEATTLE	WA
EXPRESS ONES	MAUROU,SANI	601-938-365	001	0004	TUKWILA	WA
SANI & PARTNERS	MAUROU,SANI	601-938-365	001	0002	SEATTLE	WA
SEATAC AIRPORT 24	MAUROU,SANI	601-938-365	001	0008	SEATTLE	WA
SHUTTLEEXPRESS24.COM	MAUROU,SANI	601-938-365	001	0006	SEATTLE	WA

6 Rows

Search

*This site is limited to searching for business licenses issued through the Washington State Business Licensing S
Information current as 9/20/2016 8:10:51 AM

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Washington State Department of Revenue State Business Records Database Detail

TAX REGISTRATION NO : 601938365	ACCOUNT OPENED : 3/1/2013 12:00:00 AM
UBI : 601938365	ACCOUNT CLOSED : 12/31/2015 12:00:00 AM
ENTITY NAME : MAUROU SANI	
BUSINESS NAME : SEATAC AIRPORT 24	
MAILING ADDRESS : 1800 S JACKSON ST APT 211 SEATTLE, WA 98144-2181	BUSINESS LOCATION : 1800 S JACKSON ST APT 211 SEATTLE, WA 98144-2181
ENTITY TYPE : SOLE PROPRIETOR	RESELLER PERMIT NO: N/A
	PERMIT EFFECTIVE: N/A
	PERMIT EXPIRES: N/A
NAICS CODE : 485320	
NAICS DEFINITION LIMOUSINE SERVICE	
FOR NON-COMMERCIAL USE ONLY	
9/20/2016 8:33 AM	

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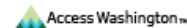
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Selected Vehicle

Plate:	B66765Y	VIN:	1FBSS3BL8DDA63572
Series body:	ECONO	Specialty plates:	None
Model year:	2013	Make:	FORD
Primary color:	WHITE	Secondary color:	
Legal residence county:	King	Special plate code:	
Old plate:		New plate:	
Issue date:	201307	Last update:	06/27/2016
Expiration date:	06/10/2017	Tab number(s):	0016-0-X163682 0017-0-F492009
Brand code(s):			
Use class:	F/H - For Hire		
Transaction code:	IR - Internet Renewal		
Previous transaction code:	IR - Internet Renewal		
VIN flags:	None		
Plate flags:	(L)-CENTENNIAL PLATE ISSUED		
Special flags:	None		

Related Vehicles

Plate	VIN	Model year	Make	Series body	Use class	Link type	Last update

Vehicle Owner

Plate	Owner type	PIC	UBI	Owner name	Birth date	Last update
B66765Y	Registered	MAUROSM352CG		MAUROU,SANI M	02/07/1965	06/27/2016

Vehicle Address

Plate	Owner type	PIC/UBI	Street	City	County	Zip code	State	Last update
B66765Y	Registered	MAUROSM352CG	1800 S JACKSON ST 211	SEATTLE	King	98144 -2181	WA	06/27/2016

Vehicle Transaction

Plate	Transaction code	Previous transaction code	Transaction date
B66765Y	IR-Internet Renewal	IR	06/27/2016

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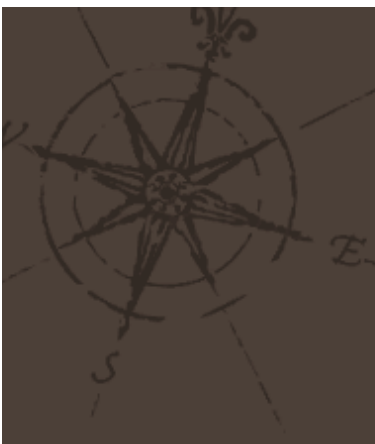
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Mukilteo	\$55	Federal Way	\$30
Redmond	\$55	Fort Lewis	\$35
Adelaide	\$35	Fremont	\$25
Anacortes	\$75	Gig Harbor	\$45
Arlington	\$60	Gold Bar	\$55
Auburn	\$55	Graham	\$45
Aurora Village	\$30	Granite Falls	\$55
Avondale	\$35	High Point	\$30
Ballard	\$40	High Rock	\$40

<i>Beaux Arts</i>	\$30	<i>Highlands</i>	\$3540
<i>Bellevue</i>	\$40	<i>Hollywood</i>	\$30
<i>Bellingham</i>	\$85	<i>Hunts Point</i>	\$35
<i>Black Diamond</i>	\$35	<i>Inglewood</i>	\$30
<i>Blaine</i>	\$90	<i>Issaquah</i>	\$35
<i>Bonney Lake</i>	\$40	<i>Juanita</i>	\$35
<i>Bothell</i>	\$45	<i>Kenmore</i>	\$35
<i>Brier</i>	\$40	<i>Kent</i>	\$35
<i>Canyon Park</i>	\$35	<i>Kirkland</i>	\$35
<i>Carnation</i>	\$40	<i>Klahanie</i>	\$40
<i>Cathcart</i>	\$40	<i>Krain</i>	\$35
<i>Cedar Falls</i>	\$85.	<i>Lacey</i>	\$45
<i>Cedar Valley</i>	\$35	<i>Lake Forest Park</i>	\$35
<i>Clearview</i>	\$35	<i>Lake Park</i>	\$30
<i>Clyde Hill</i>	\$35	<i>Lakewood</i>	\$40
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<i>Duvall</i>	\$40	<i>Lynnwood</i>	\$40
<i>Earlmont</i>	\$35	<i>Magnolia</i>	\$35
<i>Edgewood</i>	\$25	<i>Maltby</i>	\$35
<i>Edmonds</i>	\$55	<i>Maple Valley</i>	\$35
<i>Meadowdale</i>	\$35	<i>Sammamish</i>	\$40
<i>Marysville</i>	\$55	<i>Shalee</i>	\$35
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<i>Mill Creek</i>	\$45	<i>Shoreline</i>	\$35
<i>Milton</i>	\$45	<i>Silverdale</i>	\$85
<i>Mock City</i>	\$50	<i>Snohomish</i>	\$50
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<i>Monroe</i>	\$55	<i>South Bend</i>	\$105
<i>Mountlake Terrace</i>	\$35	<i>Spanaway</i>	\$60
<i>Mount Vernon</i>	\$70	<i>Spokane</i>	\$240
<i>Mukilteo</i>	\$55	<i>Stanwood</i>	\$70
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Noble	\$25	Sultan	\$65
North Bend	\$40	Stillwater	\$45
North City	\$30	Sumner	\$40
North Gate	\$30	Tacoma	\$40
Novelty	\$30	Taner	\$40
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Preston	\$35	Vancouver WA	\$175
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