## Docket Nos. TV-200626 and TV-200625 (Consolidated) - Vol. II

In the Matter of: Pro Movers LLC d/b/a Groovin Movin

August 28, 2020



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Page 15	Page 17
BEFORE THE WASHINGTON	
UTILITIES AND TRANSPORTATION COMMISSION	
WASHINGTON UTILITIES AND DOCKET NOS. TV-200625	
TRANSPORTATION COMMISSION, and TV-200626	3 -000-
(Consolidated)	4 JUDGE PEARSON: So let's be on the record.
Complainant,	5 I just want to remind everyone to keep your mic muted
	6 unless it's your turn to speak. And then, please, also
V.	7 speak slowly and clearly for the court reporter. And
PRO MOVERS LLC d/b/a GROOVIN	please don't speak over anyone else who's speaking.
MOVIN,	9 All right. Good afternoon. We're here for
Respondent.	a brief adjudicative proceeding in Docket TV-200626,
	which is captioned in the Matter of the Investigation of
	Pro Movers LLC, doing business as, Groovin Movin, for
VIDEOCONFERENCE BRIEF ADJUDICATIVE PROCEEDING BEFORE	13 compliance with Washington Administrative Code
ADMINISTRATIVE LAW JUDGE	14 Chapter 480-15. My name is Rayne Pearson. I'm filling
RAYNE PEARSON	15 in for Judge Doyle. I will be presiding over today's
Volume II Pages 15 - 39	hearing, and we are recording the hearing so that
August 28, 2020	Judge Doyle will have access to the information to issue
1:33 p.m.	18 the order.
l '	Today's Friday, August 28th, 2020, and the
	time is approximately 1:33 p.m.
	On July 20th, 2020, the Commission issued a
	notice of intent to cancel Groovin Movin's permit and
	the notice of brief issued the notice of intent to
	24 cancel following a compliance review conducted by
REPORTED BY: CRYSTAL R. McAULIFFE, RPR, CCR, #2121	25 Commission Staff in July 2020, which resulted in a
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Page 16	Page 18
1 VIDEOCONFERENCE APPEARANCES	proposed unsatisfactory safety rating for the company.
2 ADMINISTRATIVE LAW JUDGE: 3 RAYNE PEARSON	The company had until August 13th, 2020, to
UTILITIES AND TRANSPORTATION COMMISSION	file a proposed Safety Management Plan, which, to the
4 1300 South Evergreen Park Drive Southwest Olympia, Washington 98504	best of my knowledge, it has not yet done; so we will be
5 (360) 664-1160	5 addressing how that affects the company's safety rating
rayne.pearson@utc.wa.gov	6 today.
6 (Via Skype)	7 MR. GONCHARUK: They're actually it
FOR PRO MOVERS:	8 should be pulled up in the files, the UTC records right
8 ANDREY GONCHARUK	9 now.
9 GROOVIN MOVIN LLC	JUDGE PEARSON: I'm sorry. You submitted it
4804 NE 52nd Circle 10 Vancouver, Washington 98661	11 to whom?
360.487.6564	12 MR. GONCHARUK: It's in currently in UTC
11 andreygoncharuk@hotmail.com (Via telephone)	13 records, currently. It was just it was just
12	14 submitted during the meeting.
13 FOR COMMISSION STAFF: 14 DANIEL TEIMOURI	15 JUDGE PEARSON: During what meeting?
OFFICE OF THE ATTORNEY GENERAL	16 MR. GONCHARUK: The this current hearing.
15 Utilities and Transportation Commission PO Box 40128	17 It was just uploaded, the safety maintenance plan, that
16 Olympia, Washington 98504	18 was all it's in the UTC records right now. It was
daniel.teimouri@utc.wa.gov 17 (Via Skype)	19 just uploaded before this hearing.
18	20 JUDGE PEARSON: Okay. And so I just want to
19 ALSO PRESENT: Mathew Perkinson	21 ask Staff or did you provide it to Staff also?
Jason Sharp	
Jason Sharp	MR CONCHARIK: Lonky got the LITC records
20 21	22 MR. GONCHARUK: I only got the UTC records
20 21 22 23	23 e-mail to send it to. So
20 21 22	1

1 (Pages 15 to 18)

Page 19 Page 21 Daniel Teimouri here on behalf of Commission Staff. We 1 JUDGE PEARSON: Okay. So -- it's just like 1 2 2 in a regular court of law, that if you had documents you have not received a copy of it. JUDGE PEARSON: Okay. Thank you. 3 wanted me to review or Staff to review, then you would 3 MR. GONCHARUK: I'm sending -- I'm sending 4 offer them for the record. But it sounds like you've --4 multiple records out because there's only a limit of 5 5 you've given your stuff to -files able to send out once during a -- this format 6 6 MR. GONCHARUK: I guess I don't. 7 7 of -- I don't know. This platform only allows limited JUDGE PEARSON: -- the record center, but 8 amount of documents, and I have more coming in. 8 I'd also ask that you provide that via e-mail to 9 JUDGE PEARSON: Okay. Thank you. 9 Mr. Sharp and Mr. Perkinson. 10 10 So it sounds like you have submitted those MR. GONCHARUK: Okay. Okay. I could e-mail 11 through the portal. And so Staff will have access to 11 it to Mr. Sharp. Or would you like that immediately, 12 them, but not until after the hearing, is what it sounds 12 right now? 13 13 JUDGE PEARSON: You can do it after the MR. GONCHARUK: If -- if that's the case. 14 14 hearing. That's fine. They're not going to have an opportunity to look at it before the conclusion of the I -- I would not be aware of how possibly to go, there, 15 15 16 yes, but I would agree then. 16 hearing. And even if they did, they wouldn't have an 17 JUDGE PEARSON: Okay. So just to recap, 17 opportunity to evaluate it. So I just want to make sure 18 this is the second proceeding in this docket. 18 that they have it so that they have as much time as 19 Yesterday, the company failed to appear at 19 possible to review it, since we are up against a 20 the hearing that was held at 1:30. And at that 20 deadline. 21 proceeding yesterday, Docket TV-200625, which was the 21 MR. GONCHARUK: Understood. 22 penalty assessment that was issued against the company, 22 JUDGE PEARSON: So yesterday, Staff 23 23 addressed the investigation report and the proposed and Docket TV-200626, which was the notice of intent to 24 cancel permit, were consolidated. Staff presented its 24 safety rating. The company will have the opportunity, case on the merits and moved for default judgment, which 25 25 again, to state its position on any of the violations in Page 20 Page 22 1 was granted. And Staff --1 the penalty assessment. 2 2 MR. GONCHARUK: I understand. And then, once you're done testifying, 3 3 Staff's attorney may have some questions for you, and JUDGE PEARSON: Yes. So I will vacate the default judgment today and we'll give the company an 4 4 then Staff will make a final recommendation on the 5 5 opportunity to address their case. penalty amount. 6 Mr. Goncharuk, you e-mailed the Commission 6 So do you have any questions before we get 7 on July 16th and stated that the penalty was more than 7 started? you were able to pay. So we'll treat that as a request 8 8 MR. GONCHARUK: I'm not sure of the 9 for mitigation. And I'll give you an opportunity, in a 9 questions I should be asking right now, I'm sorry. 10 few moments, to address each of the violations and 10 JUDGE PEARSON: Okay. Well, it's fairly 11 straightforward, and I will be walking you through it. 11 explain what you've done to correct them. 12 So when I call on you to testify, I'll swear 12 So let's just start by taking an appearance from 13 the oath of witness so that anything you tell the Court 13 Commission Staff. will be under oath and will be considered sworn 14 MR. TEIMOURI: Thank you, Your Honor. This 14 15 15 is Daniel Teimouri, Assistant Attorney General, here on testimony. 16 16 Once you're sworn in, you can present your behalf of Commission Staff. 17 17 testimony. And if -- do you have any exhibits to offer? JUDGE PEARSON: Thank you. 18 I'm guessing not. Just the Safety Management Plan that 18 And, Mr. Goncharuk, if you could please 19 you submitted. 19 state your name and spell your last name for the record; 20 MR. GONACHARUK: No, I guess. I'm not most 20 and then also provide your address, phone number, and 21 familiar with all this terminology. 21 e-mail address.

2 (Pages 19 to 22)

MR. GONCHARUK: Address, phone number,

JUDGE PEARSON: Okay. Hold on. I need you

e-mail address. Phone number is 360.487.6564.

to start with your name. State your full name and spell

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JUDGE PEARSON: Okay. Which terminology

MR. GONCHARUK: Exhibit -- I'm not sure what

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is -- is confusing to you?

an exhibit is.

Page 23 Page 25 1 1 81.80.130; CFR sublet 392-2. your last name, please. 2 MR. GONCHARUK: Andrey Goncharuk. Last name 2 Changes were made to -- to company policies 3 spelled G-o-n-c-h-a-r-u-k. 3 and adjusted for temporary drivers that previously were 4 JUDGE PEARSON: Okay. And then your address 4 not background-checked -- well, these are all 5 5 seasonal/temporary employees. But now all will be and e-mail address, please. 6 MR. GONCHARUK: Address, 4804 Northeast 52nd 6 background-checked no matter what; temporary, full-time. 7 7 Circle, Vancouver, Washington 98661. And currently, no -- no employment is going 8 JUDGE PEARSON: And your e-mail address, 8 on, but will be. And all background checks will be done 9 9 immediately. That is the new policy on record, as please. 10 MR. GONCHARUK: Andrey Goncharuk, 10 filed. 11 A-n-d-r-e-y, G-o-n-c-h-a-r-u-k, at hotmail.com. 11 JUDGE PEARSON: Okay. Thank you. So just 12 JUDGE PEARSON: Okay. Thank you. 12 so I'm understanding correctly, it sounds like you did not get background checks on those particular 13 13 Now, Mr. Goncharuk, if you would please 13 raise your right hand, I will swear you in. employees because they're no longer with the company; is 14 14 15 Do you swear -that correct? 15 16 MR. GONCHARUK: Okay. 16 MR. GONCHARUK: Temporary employees. 17 JUDGE PEARSON: -- or affirm that the 17 JUDGE PEARSON: I just asked you a yes-or-no 18 testimony you give today will be the whole truth and 18 question. 19 19 Are those 13 employees who were named in the nothing but the truth? 20 MR. GONCHARUK: Yes, the truth. 20 penalty assessment no longer with the company? 21 JUDGE PEARSON: Okay. Thank you. All 21 MR. GONCHARUK: Correct. No longer with the right. So let's just begin talking about the violations 22 22 company. 23 23 and the penalty assessment, because those are the same JUDGE PEARSON: Okay. All right. So the 24 violations that led Staff to its recommendation of a 24 next violation is for 49 CFR Section 391.45(a), for 25 proposed unsatisfactory safety rating. 25 using a driver not medically examined and certified. If Page 24 Page 26 1 So I'll take you through them one at time. 1 you want to speak to that violation, go ahead. 2 You can briefly explain why the violation occurred, and 2 MR. GONCHARUK: One moment. Again, it has 3 then describe the steps that you've taken to correct the 3 to relate with temporary assistance of temporary 4 drivers, just filling in on emergency basis. Knowledge 4 violation and to prevent it from occurring again. 5 5 So the first violation category is of -- for temporary drivers and while I'm the primary 6 WAC 480-15-555, which is failing to acquire criminal 6 driver, I got myself fixed. I even went back to fix the 7 background checks for each prospective employee. And 7 records for -- even after they were terminated or just 8 there were 13 violations of this regulation. If you 8 left the company, I still went back and got them cards, 9 could please explain what happened and what you've done 9 just to backdate. 10 to correct it. 10 So previously did not -- failed to give 11 MR. GONCHARUK: Would you please repeat the 11 medical cards for temporary drivers, and now we have 12 12 went back, even after termination, and got them question? 13 JUDGE PEARSON: So the first set of 13 qualified and will go with only qualified individuals violations in the penalty assessment is for failing to from here on. And I am -- and there is no other 14 14 drivers. No drivers of the company. I am the only acquire criminal background checks, and you had 13 of 15 15 these violations. So if you could explain what led to 16 16 driver. 17 the violation and then whether it's been corrected. 17 JUDGE PEARSON: Okay. Thank you. And the next violation category was failing to maintain a driver 18 MR. GONCHARUK: Failure to acquire criminal 18 19 background checks, prospective employee. I mean, a 19 qualification file for each driver employed. 20 solution, application process hiring new, required for 20 Do you want to address how that's been 21 all temp -- well, temps, as well as full-time employees 21 corrected?

3 (Pages 23 to 26)

MR. GONCHARUK: Yes. Driver records. I

have pulled my driving records with the Department of

Licensing, and also -- let's see, yeah, I got a full

report for my driving record filed. Yeah -- let's see,

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to go through background check before hire. Meanwhile,

our company policy did not require background checks for

oh, man, regulation WAC 480-15-555, secondary RCW

temp employees. It did not find itself to be under --

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what else am I failing to be a part of the driver's record. And I got my ID in there. My application for myself, even though I'm a -- I'm the owner, is coming. I believe that was another requirement. But I have a --I have a file for myself and my driver's record and my medical insurance. And everything -- medical certificate, insurance, and everything.

JUDGE PEARSON: Okay. Thank you. And the next violation is for 49 CFR Section 393.75(b). This was for a front tire that had a tread depth less than 2/32 of an inch on a major tread groove. Has that violation been corrected?

MR. GONCHARUK: Yes, a receipt has been -for a dismount/remount has been posted to the records center, as well as -- there was more -- there is more vehicle records. Maintenance history has been pulled from the dealership and been e-mailed to me, which I can download or upload later. All previous records of vehicle maintenance, as well as -- what else was there on the --

JUDGE PEARSON: It sounds like you're addressing some of the violations here, which had to do with keeping minimum records of inspection and using a motor vehicle that was not periodically inspected. So it sounds like you're also speaking to those violations

Mr. Goncharuk? You need to slow down. The court reporter isn't going to be able to keep up with you if you speak that quickly.

> MR. GONCHARUK: I apologize. I can go back. Where was -- where may I restart?

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Do not drive on the 16th hour after coming on duty on the second day of any period of consecutive days. Every driver is now required to prepare RODs, a record of duty status for each 24-hour period. Changes were made to the company policies and all new employees must record, complete, or retain the log for all temps and full-time employees.

JUDGE PEARSON: Okay. Thank you. All right. Do you have anything else that you would like to add?

MR. GONCHARUK: Is -- what can I add in my favor, may I ask?

JUDGE PEARSON: I mean, anything that you want to explain about -- if the penalty would create a financial hardship for your company. Any other thing -any other factors that -- that you want.

MR. GONCHARUK: Yeah, all -- most definitely. If I may, please, thank you so much.

So I'm a small business owner. I am a -- a first-generation immigrant here, starting the American

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MR. GONCHARUK: Yeah, I'm also immediately -- yeah, everything related to the truck. It's in there getting a DOT inspection right now. And it had a drag link, and a -- it has more things being done to it on top, today, as we speak. And I got -- I uploaded an invoice for the DOT inspection and the other service being done right currently.

JUDGE PEARSON: Okay. Thank you. And then finally, the last violation was for 49 CFR 395.8 (a)(1), for failing to require a driver to prepare a record of duty status using the appropriate method. Can you address how that's been corrected, please?

MR. GONCHARUK: Solution. Because of our lack of knowledge, we did further investigate and found ourself to be under the assumption -- exemption non-CDL short haul, local only, for small loads. So we did not ever go over 88 hours. We did not go over 150 areal miles. We follow under the ten-hour off-duty, 11-hour driving requirements. We did not drive the 14-hour after coming on duty, five days, any period, seven consecutive -- seven consecutive days. We did not drive the 16-hour after coming on duty on the second day of any period seven consecutive days. We are --JUDGE PEARSON: Mr. Goncharuk?

dream as a religious refugee. Part of our mission here, mainly, is to be part of the church. And most of my proceeds have been going towards the church in Ukraine,

for villages that have been affected with the shutdown during COVID.

I myself, especially, have not advertised, marketed this year. And January/February has been the deadliest month of no work. Then I have made my first mission trip this winter, for over a month. I did not make those a process that could have been made if I were here. I came back right the day of the lockdown, when the stores were being bought out. And did not work for -- get work for three months, due to all the lockdowns were happening in the spring season. Paid for rent and everything, utilities, on loans. Did not make it to the government stimulus check. Couldn't receive that. Did not receive any other government loans. And -- and have sponsored, with everything I had, mostly to the church. And just minimum survival needs here.

Made another mission trip at this time. I was supposed to receive my legal document to register myself as part of facilities. Did not get -- with quarantine, I did not -- missed by one week receiving my document, for which I now need to go back to receive my passport again, and make another mission trip with

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end of the day, great about helping me, you know, comply and reach those goals. I understand it's frustrating to

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deal with individuals like I, but I appreciate your consideration. That's it.

JUDGE PEARSON: Okay. Thank you.

Mr. Teimouri, did you have any questions for Mr. Goncharuk?

MR. TEIMOURI: No, not at this time. Thank you, Your Honor.

JUDGE PEARSON: Okay. Thank you. And would Staff like to make a recommendation with respect to just the penalty assessment? I understand that -- and in a moment I will get to discussion about the safety rating. But just with respect to the penalty. And if you need a couple of moments, Mr. Teimouri, we can take a break.

MR. TEIMOURI: Well, I believe I have Mr. Jason Sharp on the line. And yesterday, Staff testified as to both the penalty assessment and the safety rating. And so he -- he provided his recommendation today. I don't know if he's available on the line right now to reiterate that -- that same recommendation, but if not, we could go ahead and take a short recess and then --

JUDGE PEARSON: Okay. So, Mr. Sharp, I'll just ask you, since we're not all in the same room

another lockdown coming.

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And so, yeah, kind of -- my -- my uncle, which is the pastor's helped, depends on all the financial medications, all the provisions and for the surrounding people that depend on the nonprofit services, as well as rent here and everything.

Yes, it one -- besides the fact this year has not been about profiting, but just surviving. And not receiving the handouts that some have taken advantage of, I've kind of been just living by providing more for the means of others that have been less fortunate than me, since I have sort of small business.

So definitely the -- the spiral of negative emotional side effects of stress, with all the people that depend on this that have lost their jobs during COVID. All the lockdowns.

So by all means, I mean, there is definitely a great deal and why the Commission should look into, you know, preserving this permit. You know, things will turn out. Definitely have -- this has been a learning experience from the bottom to the top, learning through all the hardships, but --

End of day, this is a service that provides, you know, quality service for its customers, quality care. And -- I mean, we're -- we're good for the

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community. And we can continue providing, you know, good positive service for everybody. And this company is not just for profiting, only -- I finish -- I dropped out of college on my last class of nonprofit philanthropy for this purpose, to start an organization to fund my way back into college for further getting an engineering degree. That's what the whole intent was.

So definitely I have chosen not to take any handouts or grants or other welfare, even when I was going through multiple surgeries in 2016 and 2019. I didn't take any grants from the State or welfare. Pretty -- it was pretty stubborn about being independent.

So the amount of spiritual energy that went to creating this organization successfully, to run five years with no reports of the -- like, serious issues or anything, it's been a pretty major feat.

So I would definitely appreciate, like, with a grateful heart and blessings for the Commission, if they consider eliminating. Because I have not profited this year, and I put myself into debt to try to make it this year.

So somebody that's already dealing with a lot of anxiety and, you know, deals with a lot every day about all this, you guys would definitely feel, at the

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together so that makes it difficult, if you are prepared to give your statement now or if you'd like a moment to confer with your attorney?

MR. SHARP: Thank you, Judge Pearson.

Jason Sharp here. I -- I believe that the recommendation that I provided yesterday took into account some corrective action from the company and displaying that the owner had gotten a medical certificate to correct the violation, for one count of the medical card violations.

As I have not yet been able to review the documents submitted to the docket this afternoon by the company, I would be unable to issue a change to my recommendation at this time.

JUDGE PEARSON: Okay. And that makes sense to me. So I think what I propose is, let's give Staff some time to look over the Safety Management Plan.

And then, Mr. Sharp, if you're comfortable, you could include with your evaluation of the Safety Management Plan a final recommendation on the penalty at that point.

MR. SHARP: Yes, I can do that, Your Honor. JUDGE PEARSON: Okay. Thank you. Mr. Teimouri, were you going to say something?

5 (Pages 31 to 34)

Page 35 Page 37 1 1 MR. TEIMOURI: Oh, I was saying that that MR. SHARP: The company is a provisional 2 2 household goods carrier. makes sense. Thank you. JUDGE PEARSON: Okay. So another thing that 3 JUDGE PEARSON: Okay. So, Mr. Goncharuk, 3 just to remind you that there are federal regulations is likely to happen, Mr. Goncharuk, is that your 4 4 5 that are governing the pace and the timing of this 5 provisional period will likely be extended until you're able to achieve a satisfactory safety rating. That's 6 proceeding. So the Commission does not have the ability 6 7 pretty routine at the Commission. 7 to extend the September 7th deadline. 8 So you have submitted your Safety Management 8 MR. GONCHARUK: Okay. How about --9 9 concerning elimination of fees? Besides the extension, Plan. Staff will be reviewing that. However, if there 10 are changes that need to be made and you have to, you 10 addressing the fines. 11 know, resubmit it or if it's not up to Staff standards 11 JUDGE PEARSON: So Staff will make its 12 and you have to do additional work, I just want to 12 recommendation regarding the penalty and whether that should be reduced or mitigated or suspended. The 13 remind you that you have a very limited time frame to 13 14 accomplish that. 14 Commission will have the final decision. I will need Staff's evaluation no later than So we have, still on the record today, 15 15 16 close of business on Wednesday, September 2nd. So --16 everything that you said with respect to your inability 17 and most likely, Staff will require a couple of days to 17 to pay. And so we'll take that all under advisement. 18 review your -- your proposed plan. So just kind of keep 18 And in the event that you do -- are assessed a penalty, 19 19 Staff is certainly amenable to making payment that in mind. 20 And does that work for Staff to provide the 20 arrangements. And that's something that you can discuss 21 with Staff after the order comes out. 21 evaluation by close of business on Wednesday, 22 22 September 2nd? MR. GONCHARUK: Thank you very much. 23 23 MR. SHARP: Yes. Either way we will submit JUDGE PEARSON: Okay. So thank you all for 24 it by the end of close of business on Wednesday. 24 appearing today. We'll issue an order reflecting the 25 JUDGE PEARSON: Okay. And also, 25 Commission's decision on the company's safety rating and Page 36 Page 38 1 Mr. Goncharuk, I just wanted to give you a little bit 1 with respect to the penalty assessment, and that order 2 2 more information. In the event that the deadline isn't will come out before the September 7th deadline. 3 3 met, if your plan turns out to not be sufficient --So is there anything else that we need to 4 address before we go off the record? 4 which, obviously I can't speak to that right now -- if 5 your permit does get canceled, there is a 30-day window 5 MR. TEIMOURI: Not from Staff, Your Honor. 6 for you to request that your permit be reinstated 6 MR. GONCHARUK: Thank you very much. That 7 without having to file a new application. So just also 7 will be all for today. 8 8 JUDGE PEARSON: Okay. Thank you so much. keep that in mind. 9 MR. GONCHARUK: Thank you very much. 9 We're adjourned. 10 Is there anything else I can do to appeal 10 11 this decision until I can get to that stage? I'm 11 (Hearing concluded at 2:02 p.m.) 12 assuming this is the final hearing for today. 12 13 JUDGE PEARSON: This is the final hearing 13 for today. Because again, like I said, we are bound by 14 14 -000-15 the federal requirement. The 60-day limit from when 15 16 you're first notified of the proposed unsatisfactory 16 17 safety rating, there's a 60-day clock that begins to run 17 18 for you to submit and have approved a proposed Safety 18 19 Management Plan that could then upgrade your rating to 19 20 conditional. 20 21 So I do have one more question for, 21 22 Mr. Sharp. 22 23 Is the company currently in provisional 23 24 24 status or do they have permanent authority at this 25 25 point?

6 (Pages 35 to 38)

	Page 39	
1	CERTIFICATE	
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4	STATE OF WASHINGTON )	
_	) SS.	
5 6	COUNTY OF KITSAP )	
7	I, CRYSTAL R. McAULIFFE, a Certified Court	
8	Reporter in and for the State of Washington, do hereby	
9	certify that the foregoing transcript of the	
10	adjudicative proceeding of AUGUST 28, 2020, is true and	
11	accurate to the best of my knowledge, skill and ability.	
12	IN WITNESS WHEREOF, I have hereunto set my hand	
13	and seal this 11th day of September, 2020.	
14 15	NOTER	
16	Cuptal meaulifle	
17	CRÝSTAL R. McAULIFFE, RPR. CCR #2121	
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7 (Page 39)

	apologize 29:4	<b>basis</b> 26:4	Chapter 17:14	conditional 36:20
A A 22.11	appeal 36:10	begins 36:17	check 24:22 30:16	conducted 17:24
<b>A-n-d-r-e-y</b> 23:11	appear 19:19	<b>behalf</b> 19:1 22:16	checks 24:7,15,19	confer 34:3
<b>ability</b> 35:6 39:11 <b>able</b> 19:6 20:8 29:2	appearance 22:12	believe 27:4 33:16	24:23 25:8,13	confusing 20:23
34:11 37:6	APPEARANCES	34:5	chosen 32:8	consecutive 28:22
access 17:17 19:11	16:1	best 18:4 39:11	<b>church</b> 30:2,3,19	28:22,24 29:7
accomplish 35:14	appearing 37:24	<b>bit</b> 36:1	<b>Circle</b> 16:9 23:7	consider 32:20
account 34:7	application 24:20	blessings 32:19	class 32:4	consideration 33:4
accurate 39:11	27:2 36:7	<b>bottom</b> 31:21	clearly 17:7	considered 20:14
achieve 37:6	appreciate 32:18	<b>bought</b> 30:12	<b>clock</b> 36:17	consolidated 15:4
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