

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

A-1 PIANO SALES & RENTALS, INC.,
ALAKSA COAST TRANSPORT, INC.;
AMERICAN MOVING CO., INC.;
ARAYS MOVING SERVICE LLC;
BACKBREAKERS NW, LLC;
CALLBOX STORAGE LLC; FIVE
STARS DELIVERY LLC; FRIENDS &
FAMILY MOVING & STORAGE LLC;
JFS TRANSPORT, INC.; JOHN
VOLKEN ACADEMY; JOHNSON'S
MOVING LLC; ALBERTO MORENO
MENDOZA; JASON M. NELSON;
PACIFIC KING RELOCATION &
LOGISTICS SYSTEMS LLC; PNW
MOVING AND DELIVERY LLC;
PROPERTY PROS EXTERIOR
SOLUTIONS LLC; REDEFYNE
MOVING LLC; STANLEY G.
ALEXANDER, INC.; and WE LIKE TO
MOVE IT, MOVE IT!! LLC,

Respondents.

DOCKET TV-191046

COMPLAINT FOR
CANCELLATION OF PERMIT
FOR FAILURE TO PAY
REGULATORY FEES AND
FAILURE TO FILE ANNUAL
REPORT; and

NOTICE OF HEARING
(Set for February 27, 2020,
at 1:30 p.m.)

- 1 **Synopsis:** *The Commission seeks cancellation of the permits of household goods carriers that have failed to pay regulatory fees as required by RCW 81.80.321 and/or failed to file an annual report as required by RCW 81.04.080.*
- 2 **Proceedings:** Household goods carriers holding a permit from the Washington Utilities and Transportation Commission (Commission) must file annual reports setting forth company operations during the preceding year. In addition, these household goods

carriers must pay annual regulatory fees to the Commission. Annual reports and regulatory fees are due on or before May 1.

- 3 Each year, in advance of this deadline, the Commission emails a link to the annual report form and instructions to all household goods carrier permit holders. Incorporated into the annual report form is a regulatory fee calculation schedule, which provides companies with step-by-step assistance in calculating their regulatory fees.
- 4 On March 16, 2019, the Commission emailed a notice containing a link to the annual report form and instructions to the email address on record with the Commission for each household goods carrier permit holder, including:

- A-1 Piano Sales & Rentals, Inc.
- Alaska Coast Transport, Inc.
- American Moving Co., Inc.
- Arays Moving Service LLC
- Backbreakers NW, LLC
- Callbox Storage LLC
- Five Stars Delivery LLC
- Friends & Family Moving & Storage, Inc.
- JFS Transport, Inc.
- John Volken Academy
- Johnson's Moving LLC
- Alberto Moreno Mendoza
- Jason M. Nelson
- Pacific King Relocation & Logistics Systems LLC
- PNW Moving and Delivery LLC
- Property Pros Exterior Solutions LLC
- Redefyne Moving LLC
- Stanley G. Alexander, Inc.
- We Like To Move It, Move It!! LLC

(collectively, the Companies). A search of Commission records indicates that each of the 19 Companies failed to file an annual report (or a complete annual report), remit a regulatory fee (if applicable), or both. Accordingly, Commission staff (Staff)¹ asks the

¹ In formal proceedings, such as this, the Commission's regulatory Staff participates like any other party, while the Commissioners make the decision. To assure fairness, the Commissioners, the presiding administrative law judge, and the Commissioners' policy and accounting advisors

Commission to issue this Complaint seeking cancellation of each company's permit for violating the reporting and regulatory fee requirements of RCW 81.80.321, RCW 81.04.080, and WAC 480-15-480.

I. COMPLAINT

- 5 The Commission on its own motion, and through its Staff, alleges as follows:
- 6 Public service companies must file an annual report with the Commission. RCW
81.04.080.
- 7 Public service companies include every common carrier, and household goods carriers
are common carriers. RCW 81.04.010.
- 8 Household goods carriers must remit to the Commission an annual regulatory fee of no
more than one quarter of one percent of its gross income from intrastate operations for
the previous calendar year. RCW 81.80.321.
- 9 The Commission is expressly empowered to issue rules and regulations governing
household goods carriers. RCW 81.04.160.
- 10 The Commission emails a link to the household goods carrier annual report forms and
instructions to each household goods carrier permit holder at its address on record with
the Commission. If a carrier does not receive the link to the form, it is the carrier's
responsibility to independently access the form online or contact the Commission and
request the form. WAC 480-15-480.
- 11 Annual reports and regulatory fees are due no later than May 1 of the year following the
year being reported. WAC 480-15-480.
- 12 The Commission may cancel a household goods carrier permit for good cause, including
failure to submit an annual report or failure to pay regulatory fees. WAC 480-15-450.
- 13 Staff conducted its yearly compliance review of annual report and regulatory fee
submissions for household goods carriers holding permits from the Commission. This
review generated a list of companies that have failed to pay regulatory fees or failed to

do not discuss the merits of this proceeding with the regulatory Staff, or any other party, without giving notice and opportunity for all parties to participate. *See* RCW 34.05.455.

submit annual reports (or complete annual reports). Those companies that still have not paid regulatory fees or filed annual reports (or complete annual reports) are named as respondents in this complaint.

- 14 A-1 Piano Sales & Rentals, Inc., (A-1 Piano) is a public service company as defined in RCW 81.04.010. A-1 Piano holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that A-1 Piano failed to file the annual report due on May 1, 2019.
- 15 Alaska Coast Transport, Inc., (Alaska Coast) is a public service company as defined in RCW 81.04.010. Alaska Coast holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that Alaska Coast failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 16 American Moving Co., Inc., (American Moving) is a public service company as defined in RCW 81.04.010. American Moving holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that American Moving failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 17 Arays Moving Service, LLC, (Arays Moving) is a public service company as defined in RCW 81.04.010. Arays Moving holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that Arays Moving failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 18 Backbreakers NW, LLC, (Backbreakers) is a public service company as defined in RCW 81.04.010. Backbreakers holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that Backbreakers failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 19 Callbox Storage LLC (Callbox) is a public service company as defined in RCW 81.04.010. Callbox holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that Callbox failed to pay the regulatory fees and file the annual report due on May 1, 2019.

- 20 Five Stars Delivery LLC (Five Stars) is a public service company as defined in RCW 81.04.010. Five Stars holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that Five Stars failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 21 Friends & Family Moving & Storage, Inc., (Friends & Family) is a public service company as defined in RCW 81.04.010. Friends & Family holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that Friends & Family failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 22 JFS Transport, Inc., (JFS) is a public service company as defined in RCW 81.04.010. JFS holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that JFS failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 23 John Volken Academy (Volken) is a public service company as defined in RCW 81.04.010. Volken holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that Volken failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 24 Johnson's Moving LLC (Johnson's Moving) is a public service company as defined in RCW 81.04.010. Johnson's Moving holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that Johnson's Moving failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 25 Alberto Moreno Mendoza (Mendoza) is a public service company as defined in RCW 81.04.010. Mendoza holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that Mendoza failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 26 Jason M. Nelson (Nelson) is a public service company as defined in RCW 81.04.010. Nelson holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that Nelson failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 27 Pacific King Relocation & Logistics Systems LLC (Pacific) is a public service company as defined in RCW 81.04.010. Pacific holds authority to transport household goods in the

state of Washington for compensation. From the Commission's files and records, it appears that Pacific failed to pay the regulatory fees and file the annual report due on May 1, 2019.

- 28 PNW Moving and Deliver LLC (PNW) is a public service company as defined in RCW 81.04.010. PNW holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that PNW failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 29 Property Pros Exterior Solutions (Property Pros) is a public service company as defined in RCW 81.04.010. Property Pros holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that Property Pros failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 30 Redefyne Moving, LLC (Redefyne), is a public service company as defined in RCW 81.04.010. Redefyne holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that Redefyne failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 31 Stanley G. Alexander, Inc., (Alexander) is a public service company as defined in RCW 81.04.010. Alexander holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that Alexander failed to file the annual report due on May 1, 2019.
- 32 We Like to Move It, Move It!! LLC (We Like to Move It) is a public service company as defined in RCW 81.04.010. We Like to Move It holds authority to transport household goods in the state of Washington for compensation. From the Commission's files and records, it appears that We Like to Move It failed to pay the regulatory fees and file the annual report due on May 1, 2019.
- 33 In sum, the foregoing 19 Companies have failed to remit regulatory fees (if applicable) and file annual reports (or complete annual reports).

II. REQUEST FOR RELIEF

- 34 Staff asks the Commission to find that the Companies failed to comply with RCW 81.80.321, RCW 81.04.080, and WAC 480-15-480 by failing to pay regulatory fees and file annual reports (or complete annual reports).

35 Staff requests that the Commission, pursuant to its authority in WAC 480-15-450, cancel the permits of the respondent household goods carriers.

III. PROBABLE CAUSE

36 Based on a review of Commission Staff's investigation report of Commission records pertaining to the submission of annual reports and regulatory fees by household goods carriers, and consistent with RCW 80.01.060 and WAC 480-07-307, the Commission finds probable cause exists to issue this Complaint.

IV. NOTICE OF HEARING

37 **NOTICE IS HEREBY GIVEN that a hearing in this matter will be held on February 27, 2020, at 1:30 p.m., in the Commission's Richard Hemstad Hearing Room, 621 Woodland Square Loop SE, Lacey, Washington.**

38 The Commission will hear this matter under the Administrative Procedure Act (APA), RCW chapter 34.05,² and pursuant to the Commission's procedural rules in WAC chapter 480-07.³ The Commission has jurisdiction over this matter pursuant to RCW chapters 80.01, 81.04, and 81.80,⁴ and under WAC 480-15.⁵

39 **THE COMMISSION GIVES FURTHER NOTICE that any party who fails to attend or participate in the hearing set by this notice, or any other stage of this proceeding, may be held in default in accordance with RCW 34.05.440 and WAC 480-07-450.**

40 If any party or witness needs an interpreter or other assistance, please fill out the form attached to this notice and return it to the Commission.

² Applicable sections include but are not limited to RCW 34.05.413, RCW 34.05.422, RCW 34.05.434, RCW 34.05.440, RCW 34.05.449, and RCW 34.05.452.

³ Applicable sections include but are not limited to WAC 480-07-140, WAC 480-07-150, WAC 480-07-305, WAC 480-07-365, WAC 480-07-440, WAC 480-07-450, WAC 480-07-470, WAC 480-07-490, and WAC 480-07-495.

⁴ Applicable sections include but are not limited to RCW 80.01.040, RCW 81.04.080, RCW 81.04.110, RCW 81.80.130, RCW 81.80.280, RCW 81.80.290, RCW 81.80.321, and RCW 81.80.330.

⁵ Applicable sections include but are not limited to WAC 480-15-145, WAC 480-15-450, and WAC 480-15-480.

41 The names and mailing addresses of all known parties and their known representatives are as follows:

Complainant: Washington Utilities and
Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98504
PO Box 47250
Olympia, WA 98504-7250
(360) 664-1160

Representative: Jeff Roberson
Assistant Attorney General
PO Box 40128
Olympia, WA 98504-0128
(360) 664-1188
jeff.roberson@utc.wa.gov

Respondent: A-1 PIANO SALES & RENTALS, INC.
Brett Mulholland, General Manager
14210 NE 20th St., Ste. B
Bellevue, WA 98007
bsmulholland@a-1pianos.com
info@a-1pianos.com

Respondent: ALASKA COAST TRANSPORT, INC.
P.O. Box 24784
Seattle, WA 98124
ACT@alaskacoasttrans.com

Respondent: AMERICAN MOVING CO., INC.
3172 W. Seltice Way
Post Falls, ID 83854
americanmoving5@gmail.com

Respondent: ARAYS MOVING SERVICE, LLC
P.O. Box 190
Gig Harbor, WA 98335
alex@a-raysmovingsolutions.com

Respondent: BACKBREAKERS NW, LLC
Jeff Hansen, Owner/Member
P.O. Box 521
Freeland, WA 98249
jeff@backbreakersnw.com

Respondent: CALLBOX STORAGE LLC.
5835 Segale Park Dr. C
Tukwila, WA 98188
tziebarth@callboxstorage.com

Respondent: FIVE STARS DELIVERY LLC
1715 NE 72nd Cir.
Vancouver, WA 98665
pmsergio@aol.com

Respondent: FRIENDS & FAMILY MOVING & STORAGE, INC.
John Nuse, President
11914 SE 206th St.
Kent, WA 98031
john@friendsandfamilymoving.com

Respondent: JFS TRANSPORT, INC.
P.O. Box 190
Gig Harbor, WA 98335
jfsmoving@yahoo.com

Respondent: JOHN VOLKEN ACADEMY
Randall Klotz, Manager
921 Central Avenue
Kent, WA 98032
sales@academymovers.org

Respondent: JOHNSON'S MOVING LLC
Cory Johnson, Owner
407 E. Ballard Road
Colbert, WA 99005
johnsonsmovingllc@gmail.com

Respondent: MENDOZA, ALBERTO MORENO
3511 S. Ronald Dr.
Seattle, WA 98118
octopusmovers@gmail.com

Respondent: NELSON, JASON M.
9004 104th St. SW
Lakewood, WA 98498
parkersmoving@hotmail.com

Respondent: PACIFIC KING RELOCATION & LOGISTICS
SYSTEMS LLC

Cesar Manual Aguilar Rios, President
608 W. Yakima St. Apt. B
Pasco, WA 99301
cesaraguilar1000@yahoo.com

Respondent: PNW MOVING AND DELIVERY LLC
Dmitriy Satir, Owner
833 103rd St.
Tacoma, WA 98444
dmitriysatir@gmail.com

Respondent: PROPERTY PROS EXTERIOR SOLUTIONS
P.O. Box 291
Black Diamond, WA 98010
antointemcleod@yahoo.com

Respondent: REDEFYNE MOVING, LLC
Aaron Schaller, Owner
8811 SE Herbert Ct., Ste. B
Clackamas, OR 97015
sarah@redefynemoving.com
aaron@redefynemoving.com

Respondent: Stanley G. Alexander, Inc.
Mike Mattingley, Branch Manager
2942 Dow Ave.
Tustin, CA 92780
jyee@alexanders.net
info@alexanders.net

Respondent: WE LIKE TO MOVE IT, MOVE IT!! LLC
Joshua Manion, Owner
16825 48th Ave. W, Ste. 360
Lynnwood, WA 98037
weliketomoveitmoveit3@gmail.com

42 Administrative Law Judges Rayne Pearson and Samantha Doyle from the Utilities and Transportation Commission's Administrative Law Division will co-preside at the hearing.⁶

⁶ Judge Pearson can be reached by phone at (360) 664-1136 or by email at rayne.pearson@utc.wa.gov. Judge Doyle can be reached by phone at (360) 664- 1164 or by email at samantha.doyle@utc.wa.gov.

43 Notice of any other procedural phase will be given in writing or on the record as the Commission may deem appropriate during the course of this proceeding.

DATED at Olympia, Washington, and effective January 21, 2020.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

/s/ Gregory Kopta _____

GREG KOPTA

Administrative Law Judge

Inquiries may be addressed to:

Executive Director and Secretary
Washington Utilities and
Transportation Commission
621 Woodland Square Loop S.E.
P. O. Box 47250
Olympia, WA 98504-7250
(360) 664-1160

NOTICE

PLEASE NOTE: The hearing facilities are accessible to interested people with disabilities; that smoking is prohibited; and, if limited English-speaking or hearing-impaired parties or witnesses are involved in a hearing and need an interpreter, a qualified interpreter will be appointed at no cost to the party or witness.

The information needed to provide an appropriate interpreter or other assistance should be stated below and returned to Washington Utilities and Transportation Commission, Attention: Mark Johnson, 621 Woodland Square Loop SE, P.O. Box 47250, Olympia, WA 98504-7250. (PLEASE SUPPLY ALL REQUESTED INFORMATION)

Docket: _____

Case Name: _____

Hearing Date: _____ Hearing Location: _____

Primary Language: _____

Hearing Impaired: (Yes) _____ (No) _____

Do you need a certified sign language interpreter?

Visual _____ Tactile _____

Other type of assistance needed: _____

English-speaking person who can be contacted if there are questions:

Name: _____

Address: _____

Phone No.: (_____) _____