

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

ALLIED VAN LINES, INC., PACIFIC
MOVERS, INC., 3Z MOVERS LLC,
CAN'T STOP MOVING, LLC, NORTH
COAST MOVING AND STORAGE
COMPANY, LLC, PRO MOVERS LLC,
ERIC'S SMALL MOVES & DELIVERY
LLC, SEATTLE MOVES & MORE LLC,
PNW MOVING AND DELIVERY LLC,
MENDEZ MOVERS LLC, MIRACLE
MAN MOVERS LLC, GM MOVE
TRANSPORT LLC, MR. MUSCLES
MOVING COMPANY LLC, ONE
NATION GROUP LLC, HYLAN,
NICHOLAS d/b/a HYLAN MOVING,
C&N ENTERPRISES, INC., LION
MOVERS LLC, EXTRAORDINARY
MOVING & STORAGE LLC, NEST
MOVING AND STORAGE LLC,

Respondents.

DOCKET TV-230838

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

NOTICE OF BRIEF
ADJUDICATIVE PROCEEDING;
SETTING TIME FOR ORAL
STATEMENTS
(Set for January 11, 2024,
at 1:30 p.m.)

1 The Washington Utilities and Transportation Commission (Commission), on its own motion, and through its regulatory staff (Staff), alleges as follows:

I. PARTIES

2 The Commission is an agency of the state of Washington authorized by statute to regulate the rates, services, facilities, and practices of public service companies, including household goods carriers.

3 Allied Van Lines, Inc. (Allied) is a corporation that engages in business as a household goods carrier under Commission-issued permit HG005221.

- 4 Pacific Movers, Inc. (Pacific) is a corporation that engages in business as a household goods carrier in Washington under Commission-issued permit HG001186.
- 5 3Z Movers, LLC (3Z) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit THG065160.
- 6 Can't Stop Moving, LLC (Can't Stop) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit THG063768.
- 7 North Coast Moving and Storage Company, LLC (North Coast Moving) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit HG004891.
- 8 Pro Movers LLC (Pro Movers) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit HG066237.
- 9 Eric's Small Moves & Delivery LLC (Eric's Small) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit HG067465. This company's business status is noted as "delinquent" according to the Washington Secretary of State's website.
- 10 Seattle Moves & More LLC (Seattle Moves) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit HG067503.
- 11 PNW Moving and Delivery LLC (PNW moving) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit THG067549.
- 12 Mendez Movers LLC (Mendez) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit THG068506.
- 13 Miracle Man Movers LLC (Miracle Man) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit THG068778.
- 14 GM Move Transport LLC (GM Move) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit HG068988. This company's business status is noted as "administratively dissolved" according to the Washington Secretary of State's website.

- 15 Mr. Muscles Moving Company LLC (Mr. Muscles) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit THG069221. This company's business status is noted as "administratively dissolved" according to the Washington Secretary of State's website.
- 16 One Nation Group LLC (One Nation) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit HG069235.
- 17 Hylan, Nicholas d/b/a Hylan Moving (Hylan Moving) is a sole proprietorship that engages in business as a household goods carrier under Commission-issued permit THG069573.
- 18 C&N Enterprises, Inc. (C&N) is a corporation that engages in business as a household goods carrier under Commission-issued permit THG069696.
- 19 Lion Movers LLC (Lion) is Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit THG070121.
- 20 Extraordinary Moving & Storage LLC (Extraordinary Moving) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit HG069123.
- 21 Nest Moving and Storage LLC (Nest Moving) is a Washington limited liability company that engages in business as a household goods carrier under Commission-issued permit THG070696. This company's business status is noted as "delinquent" according to the Washington Secretary of State's website.

II. BACKGROUND

- 22 Each household goods carrier must file an annual report with the Commission describing its operations. Each carrier must file this report by May 1 of the year following the year covered by the report.
- 23 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.
- 24 Each household goods carrier must also remit to the Commission regulatory fees intended to cover the cost of regulating the household goods industry. The fee is fixed by rule as a

percentage of a household goods carrier's annual intrastate gross operating revenues. Each carrier must remit these fees to the Commission by May 1 of the year following the year for which the carrier is paying fees.

- 25 Staff conducted its 2023 annual 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 submit annual reports (or complete annual reports).
- 26 The Commission's files and records indicate that Allied failed to file its annual report and failed to pay regulatory fees due on May 1, 2023.
- 27 The Commission's files and records indicate that Pacific failed to file the annual report and failed to pay regulatory fees due on May 1, 2023.
- 28 The Commission's files and records indicate that 3Z failed to file the annual report and failed to pay regulatory fees due on May 1, 2023.
- 29 The Commission's files and records indicate that Can't Stop failed to file a complete, and thus acceptable, annual report due on May 1, 2023.
- 30 The Commission's files and records indicate that North Coast Moving failed to file a complete, and thus acceptable, annual report due on May 1, 2023.
- 31 The Commission's files and records indicate that Pro Movers failed to file a complete, and thus acceptable, annual report due on May 1, 2023.
- 32 The Commission's files and records indicate that Eric's Small failed to file the annual report and failed to pay regulatory fees due on May 1, 2023.
- 33 The Commission's files and records indicate that Seattle Moves failed to file the annual report and failed to pay regulatory fees due on May 1, 2023.
- 34 The Commission's files and records indicate that PNW Moving failed to file a complete, and thus acceptable, annual report and failed to pay regulatory fees due on May 1, 2023.
- 35 The Commission's files and records indicate that Mendez failed to pay the regulatory fees due on May 1, 2023.
- 36 The Commission's files and records indicate that Miracle Man failed to file a complete, and thus acceptable, annual report due on May 1, 2023.

- 37 The Commission's files and records indicate that GM Move failed to file a complete, and thus acceptable, annual report due on May 1, 2023.
- 38 The Commission's files and records indicate that Mr. Muscles failed to file a complete, and thus acceptable, annual report and failed to pay regulatory fees due on May 1, 2023.
- 39 The Commission's files and records indicate that One Nation failed to file a complete, and thus acceptable, annual report due on May 1, 2023.
- 40 The Commission's files and records indicate that Hylan Moving failed to file a complete, and thus acceptable, annual report due on May 1, 2023.
- 41 The Commission's files and records indicate that C&N failed to file a complete, and thus acceptable, annual report as due on May 1, 2023.
- 42 The Commission's files and records indicate that Lion failed to file a complete, and thus acceptable, annual report due on May 1, 2023.
- 43 The Commission's files and records indicate that Extraordinary Moving failed to file the annual report and pay regulatory fees due on May 1, 2023.
- 44 The Commission's files and records indicate that Nest Moving failed to file the annual report and pay regulatory fees due on May 1, 2023.

III. JURISDICTION

- 45 The Commission has jurisdiction over the subject matter of this complaint under chapter 34.05 RCW, RCW 80.01.040, RCW 80.01.060, RCW 81.01.010, RCW 81.04.010, RCW 81.04.020, RCW 81.04.080, RCW 81.04.110, RCW 81.04.460, RCW 81.80.321, WAC 480-15-450, and WAC 480-15-480.

III. APPLICABLE LAW

- 46 The Commission regulates public service companies pursuant to a delegation of authority from the legislature. See RCW 80.01.040(2); RCW 81.01.010.
- 47 Household goods carriers are common carriers. RCW 81.04.010(11). Every common carrier is a public service company. RCW 81.04.010(16).
- 48 Each common carrier must file with the Commission an annual report in the form prescribed by the Commission. RCW 81.04.080(1), (4); WAC 480-15-480(1). Every

carrier must file its annual report by May 1 based on the prior year's operations. WAC 480-15-480(4).

49 Failing to file an annual report subjects the common carrier to cancellation or revocation of its operating authority. RCW 81.04.080(2)(b); WAC 480-15-480(4)(b).

50 Each household goods carrier must pay a regulatory fee of 0.25 percent of its gross income from intrastate operations for each calendar year. RCW 81.80.321; WAC 480-15-480(3), (4). Carriers must pay regulatory fees by May 1 based on the prior year's operations. WAC 480-15-480(4).

51 Failing to pay regulatory fees subjects a household goods carrier to cancellation of its permit. WAC 480-15-450(1)(a), -480(4)(b).

IV. REQUEST FOR RELIEF

52 Staff requests that the Commission find that the named respondents failed to comply with RCW 81.80.321, RCW 81.04.080, and WAC 480-15-480 by failing to pay regulatory fees or file annual reports (or complete annual reports), or both.

53 Staff requests that the Commission cancel the permits of the respondent household goods carriers pursuant to its authority under WAC 480-15-450(1)(a) and WAC 480-15-450.

V. PROBABLE CAUSE

54 Based on a review of the Declaration of Esther Neal, and consistent with RCW 80.01.060 and WAC 480-07-307, the Commission finds probable cause exists to issue this Complaint.

VI. NOTICE OF BRIEF ADJUDICATIVE PROCEEDING

55 The Commission will hear this matter under the Administrative Procedure Act (APA), particularly Part IV of RCW 34.05 relating to adjudications. The provisions of the APA that relate to this proceeding include, but are not limited to RCW 34.05.413, RCW 34.05.422, RCW 34.05.431, RCW 34.05.440, RCW 34.05.449, and RCW 34.05.452. The Commission's procedural rules, chapter 480-07 WAC, will apply in this proceeding.

56 **THE COMMISSION GIVES NOTICE That it will hold a virtual brief adjudicative proceeding in this matter at 1:30 p.m. on January 11, 2024. To participate by phone,**

call (253) 215-8782 and enter the Meeting ID: 885 4602 2466# and Passcode 578848#. To attend via Zoom, please use the following link: [Click to join meeting](#).¹

- 57 The record in this case will consist of any documents regarding the matter that are considered by or prepared for the presiding officer for the brief adjudicative proceeding and a transcript of any oral statements given at the hearing, which statements will be given under oath.
- 58 Written notice of any other stage in the proceeding or other formal proceedings that the Commission may deem appropriate will be given during the course of this case. The Commission will provide at its offices in Lacey, Washington, copies of documents in the current record for use by the parties or others who may want to review them.
- 59 **THE COMMISSION GIVES NOTICE** that any party who fails to attend or participate in the brief adjudicative proceeding set by this Notice, or any other stage of this proceeding, may be held in default under RCW 34.05.440 and WAC 480-07-450.
- 60 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.
- 61 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

Representative: Josephine Strauss
Assistant Attorney General
PO Box 40128
Olympia, WA 98504-0128
(360) 709-4850
josephine.strauss@utc.wa.gov

Respondent: Allied Van Lines Inc.
Corporation Service Company, Registered Agent
300 Deschutes Way SW STE 208 MC-CSC1
Tumwater, WA 98501

Respondent: Pacific Movers, Inc.
CT Corporation System, Registered Agent

¹ <https://utc-wa-gov.zoom.us/j/88546022466?pwd=DRzw4q6KZhvE7BmX56MINehfpKqzdV.1>

711 Capitol Way S, Suite 204
Olympia, WA 98501-1267

Respondent: 3Z Movers LLC
Boubcar Zida, Registered Agent and Governor
11801 97th LN NE Unit A315
Kirkland, WA 98034-7233

Respondent: Can't Stop Moving, LLC
United States Corporation Agents Inc., Registered Agent
and Governor
14205 SE 36th St STE 100
Bellevue, WA 98006-1553

Respondent: North Coast Moving and Storage Company, LLC
North Coast Moving and Storage Company, Registered
Agent and Governor
13045 SE 32nd St
Bellevue, WA
98005-4407

Respondent: Pro Movers LLC
Andrey Goncharuk, Registered Agent and Governor
3101 NE 138th Ave
Vancouver, WA 98692

Respondent: Eric's Small Moves & Delivery LLC
Eric Burgemeister, Registered Agent and Governor
111 1st Ave S Apt 604
Seattle, WA 98104

Respondent: Seattle Moves & More LLC
Lars Kaldestad, Registered Agent and Governor
2602 NW 87th St
Seattle, WA 98117-3839

Respondent: PNW Moving and Delivery LLC
Dmitriy Satir, Registered Agent
708 133rd St S
Tacoma, WA 98444-3523

Respondent: Mendez Movers, LLC
Noe Mendez, Registered Agent and Governor
319 N 46th Ave
Yakima, WA 98902-3542

Respondent: Miracle Man Movers, LLC
Christopher Douglas Bullock, Registered Agent and Governor
14602 NE Fourth Plain Blvd, J
Vancouver, WA 98682-5000

Respondent: GM Move Transport LLC
Aaron Galvez, Registered Agent and Governor
14422 42nd Ave S
Tukwila, WA 98168-4465

Respondent: Mr. Muscles Moving Company LLC
Alex Conner, Registered Agent and Governor
9440 Olson PL SW
Seattle, WA 98106-3123

Respondent: One Nation Group LLC
Registered Agents, Inc., Registered Agent
100 N Howard St, STE R
Spokane, WA 99201

Respondent: Hylan, Nicholas d/b/a Hylan Moving
Nicholas James Hylan, Registered Agent
213 Carswell Dr
Moses Lake, WA
98837-3118

Respondent: C&N Enterprises, Inc.
Registered Agents, Inc., Registered Agent
100 N Howard St STE R
Spokane, WA 99201

Respondent: Lion Movers LLC
Almaz Nurmanbetov, Registered Agent and Governor
22440 Benson Rd SE Apt B1
Kent, WA 98031-2508

Respondent: Extraordinary Moving & Storage LLC
Fairchild Record Search, LTD, Registered Agent
3400 Capitol Blvd SE STE 101
Tumwater, WA 98501-3351

Respondent: Nest Moving and Storage LLC
Cynthia Shabliuk, Registered Agent
637 173rd St S
Spanaway, WA 98387-8922

- 62 Administrative Law Judge Bijan Hughes from the Utilities and Transportation Commission's Administrative Law Division will preside at the hearing.²
- 63 Commission will give parties notice of any other procedural phase of the proceeding in writing or on the record, as appropriate during this proceeding.

DATED at Olympia, Washington, and effective November 30, 2023.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

/s/ Michael Howard
Director, Administrative Law Division

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) 701-1612

² Judge Hughes may be reached by email at bijan.hughes@utc.wa.gov or by phone at (360) 664-1254.

NOTICE

Hearings are accessible to persons with disabilities and persons who do not speak English as a first language. 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.

If you need an interpreter, or have other special needs, please provide the information requested below via email to Paige Doyle, paralegal, at paige.doyle@utc.wa.gov:

(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: _____