

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

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

CHRIS ROBERT MILLER,  
D/B/A SILVER LIMOUSINE AND  
SILVER TRANSPORTATION

DOCKET TE-180455

DECLARATION OF  
JASON HOXIT

Jason Hoxit, 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 Transportation Safety Division. As a compliance investigator, my responsibilities include conducting investigations into the operations of regulated and unregulated transportation companies. As part of those duties, I investigate charter party and excursion service carriers that may be operating without the required Commission-issued certificate.
2. On November 14, 2016, David Pratt, Assistant Director, Transportation Safety, sent a compliance letter to Chris Robert Miller, d/b/a Silver Limousine, at 117 NW 189th Street, Ridgefield, WA 98642.<sup>1</sup> The compliance letter stated that Commission staff believed Silver Limousine was operating as a charter party or excursion service carrier in the state of Washington without the required certificate, and requested Chris Miller to respond no later than December 5, 2016, to avoid enforcement action by the Commission. Mr. Miller failed to respond to Commission staff.
3. On February 28, 2018, Commission Motor Carrier Safety Investigator Francine Gagne and Federal Motor Carrier Safety Administration (FMCSA) Safety Investigator David Armstrong completed a joint compliance review of Silver Limousine. Chris Miller was present during the investigation.<sup>2</sup> The FMCSA report provided documentation that Silver Limousine was operating several vehicles with seating capacities that required charter party or excursion service carrier authority from the Commission if operated intrastate.

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<sup>1</sup> See Attachment A for a copy of the compliance letter mailed to Silver Limousine, dated Nov. 14, 2016.

<sup>2</sup> See Attachment B for FMCSA investigation report, dated Feb. 28, 2018.

4. On September 10, 2019, I searched Washington Department of Revenue's (DOR) Business Licensing Service, and Washington Secretary of State's (SOS) database, which produced records showing two businesses registered to Chris Miller: Silver Transportation LLC, and Chris Robert Miller, d/b/a Silver Limousine and Silver Transportation. Silver Transportation LLC is registered under UBI: 603-083-070; lists the governing people as Chris Miller, Mike Thomas, and Silver Transportation LLC; lists an address of 117 NW 189th Street, Ridgefield, WA 98642; and shows the SOS status as administratively dissolved.<sup>3</sup> Chris Robert Miller, d/b/a Silver Limousine and Silver Transportation (Silver Limousine or Company) is registered under UBI: 602-652-537; lists the sole proprietor as Chris Robert Miller; lists an address of 117 NW 189th Street, Ridgefield, WA 98642; and shows the DOR status as closed.<sup>4</sup>
5. On September 10, 2019, I searched Commission records and found that Silver Limousine has never had charter party or excursion service carrier authority from the Commission.<sup>5</sup>
6. On September 10, 2019, I visited Silver Limousine's website at [www.pdxlimo.net](http://www.pdxlimo.net).<sup>6</sup> The Company's homepage advertises a fleet consisting of towncars, Hummers, Excursions, and a party bus. Silver Limousine's "about" page references a "Chris," and provides the phone numbers of (360) 606-3861 and (503) 310-7776. The Company's virtual tour page contains a viewer with a selection of panoramic images for its party bus, two Excursions, Hummer, and a Lincoln. In the panoramic image of the party bus, I observed a vehicle with an interior that enables passengers to stand and circulate throughout the vehicle because seating is placed around the perimeter of the bus.<sup>7</sup>
7. On September 10, 2019, using an assumed name, I requested a quote for roundtrip transportation service from Battle Ground to Vancouver, Washington for 16 people through Silver Limousine's website.<sup>8</sup> A limousine endorsement through Washington

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<sup>3</sup> See Attachment C for a copy of SOS and DOR records for UBI: 603-083-070, captured on September 10, 2019.

<sup>4</sup> See Attachment D for a copy of DOR records for UBI: 602-652-537, captured on September 10, 2019.

<sup>5</sup> See Attachment E for a copy of Commission records, captured on September 10, 2019.

<sup>6</sup> See Attachment F for a copy of the Company's website, captured on April 29, 2019.

<sup>7</sup> WAC 480-30-036 defines "Party bus" as "any motor vehicle whose interior enables passengers to stand and circulate throughout the vehicle because seating is placed around the perimeter of the bus or is nonexistent ..."

<sup>8</sup> See Attachment G for a copy of the completed contact form through the Company's website, captured on September 10, 2019.

State Department of Licensing allows a limousine carrier to operate an automobile with a seating capacity behind the driver of no more than 14 passengers.<sup>9</sup>

8. On September 16, 2019, I received an email from “Chris” at pdxlimo@gmail.com. In the email “Chris” stated, “Our Party bus rentals start out at \$150 per hour and go up from there depending on which party bus is needed (size wise) 15 passenger (\$150), 18 passenger (\$165) or our 24 passenger (\$180).”<sup>10</sup>
9. On September 16, 2019, I replied to the email and asked which vehicle can transport 18 passengers and which vehicle can transport 24 passengers. On September 18, 2019, the Company stated, “We have Hummers Limos [*sic*] that seat up to 18 people as well as a party bus that seats 18 – 20 people and a 24 passenger party bus.”<sup>11</sup>
10. On October 7, 2019, I searched FMCSA’s Safety and Fitness Electronic Records System (SAFER) for Silver Limousine. SAFER produced records showing a physical and mailing address of 117 NW 189th Street, Ridgefield, WA 98642; a phone number of (360) 606-3861; and an operating status as “out-of-service,” effective April 24, 2018.<sup>12</sup>

DATED this 24th day of October, 2019 at Lacey, Washington.

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JASON HOXIT

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<sup>9</sup> WAC 308-83-010(12)(a).

<sup>10</sup> See Attachment H for a copy of the email conversation with Silver Limousine, captured on September 30, 2019.

<sup>11</sup> *Id.*

<sup>12</sup> See Attachment I for a copy of SAFER records, captured on October 7, 2019.