BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

|  |  |
| --- | --- |
| In Re Application of:FIVE STARS MOVING & STORAGE, LLC, for a permit to operate as a motor carrier of household goods. | NO. TV-150223TV-150223DECLARATION OF PREJUDICEDECLARATION OF CHRISTOPHER WALL |

Christopher T. Wall declares as follows:

1 I am the attorney for Five Stars Moving & Storage LLC in the above captioned action. I am over the age of 18, and I make this declaration based on personal knowledge.

2. Attached as **Exhibit A** is a true and accurate copy of the February 26, 2015 memorandum from Sharon Wallace to Dave Pratt, obtained Assistant Attorney General Andrew O’Connel in preparation for this matter. The memorandum cites “a google.plus advertisement for ‘Better Than The Rest’ ” which advertises “full service moves.” Ex. A at 2. The memorandum notes that “Mr. Trick contends that this is an old website that is no longer used.” *Id.*

3. Google.Plus business listings can be created in two ways: (1) a business can create its own listing; or (2) Google.Plus will automatically generate listings for businesses.[[1]](#footnote-1) In this case, Google.Plus automatically created this listing based on a website that was Mr. Trick and his then-business partner set up in their efforts to start a moving company. That website no longer exists.

4. Attached as **Exhibit B** is a true and accurate copy of a request that I submitted to Google.Plus to remove “Better Than The Rest” moving and storage from the google results. I submitted a report that the business was permanently closed.

5. Attached as **Exhibit C** is a true and accurate copy of a confirmation Google sent to me that it had published my edit that the business is permanently closed.

6. Attached as **Exhibit D** is a true and accurate copy of the Google.Plus results for “Better Than The Rest” reflecting that the business is permanently closed.

7. Attached as **Exhibit E** is a true and accurate copy of the webpage for www.betterthantherest.com. I performed this search on June 3, 2015. The webpage indicates that the domain is currently unused and is available for lease.

8. On June 3, 2015, I visited the Wayback Machine’s web archive. The Wayback Machine is a non-profit organization that captures webpages over time. It’s mission is to build an internet library of historical webpages as they existed at a given point in time. *About the Internet Archive*, available at https://archive.org/about/ (last visited June 3, 2015). There were four listings for the website www.betterthantherest.com. Attached as **Exhibit F** are true and accurate copies of the Wayback Machine’s web capture of the webpage for www.betterthantherest.com on November 21, 2008, July 27, 2013, May 18, 2014 and December 19, 2014. Each shows that the website was unused and available for lease.

9. Attached as **Exhibit G** is a true and accurate copy of the King County Prosecuting Attorney’s Office’s PAO Reentry Summit -- Final Report obtained from the King County website.

10. Attached as **Exhibit H** is a true and accurate copy of the article America’s Recidivism Nightmare available at

http://www.thedailybeast.com/articles/2014/04/22/america-s-recidivism-nightmare.html.

11. Attached as **Exhibit I** is a true and accurate copy of Columbia Legal Services webpage on the CROP bill, available at http://columbialegal.org/Bill-Reduces-Barriers-to-Work.

12. Attached as **Exhibit J** is a true and accurate copy of the House Bill Report on HB 1553, obtained from the Washington Legislature’s website available at http://app.leg.wa.gov/billinfo/summary.aspx?bill=1553&year=2015.

13. Attached as **Exhibit K** is a true and accurate copy of the Washington State Institute for Public Policy’s Sex Offender Sentencing in Washington State December 2005 publication.

14. Attached as **Exhibit L** is a true and accurate copy of the Washington State Institute for Public Policy’s Sex Offender Sentencing in Washington State January 2006 publication.

I SWEAR UNDER PENALTY OF PERJURY OF THE LAWS OF WASHINGTON THAT THE FOREGOING IS ACCURATE AND CORRECT.

*/s/ Christopher T. Wall*

CHRISTOPHER T. WALL

1. Mike Blumenthal, Local University, *How Do I Merge My Google + Pages? Usually You Can’t, Now What?*, available at http://localu.org/blog/merge-google-pages-usually-cant-now/ “Google will automatically create a G+ Page for local for any business that has a bricks and mortar presence, as well as for individual doctors, lawyers and real estate agents at those locations. Typically there is no way to suppress or delete this G+ Page for local.” [↑](#footnote-ref-1)