BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Determining the Proper Carrier Classification of, and Complaint for Penalties against:)	DOCKET TV-140345
CARRIE CREECH d/b/a COPE QUALITY SERVICES)	DECLARATION OF LYNDA HOLLOWAY
) -)	

Lynda Holloway, 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 Consumer Protection and Communications Section. As a Compliance Investigator, my responsibilities include conducting investigations regarding the business practices of regulated utility or transportation companies. As part of those duties, I investigate household goods carriers that may be operating without the required Commission permit.
- 2. Commission Staff (Staff) began an investigation into the activities of Carrie Creech d/b/a Cope Quality Services through an investigation into the activities of Casandra Pugh d/b/a City to City Movers, in June 2013. Staff found advertisements on www.craigslist.org (Craigslist) and a Facebook profile of www.facebook.com/citytocitymovers offering moving services. The Craigslist advertisements list an email address of citytocitymovers1@gmail.com and ask readers to call or text "Casandra" at 206-788-7120. One advertisement offers "a two-man crew for \$40 per hour and a three-man crew for \$60 per hour, with a three hour minimum" and "Packing, Moving & Cleaning Packages." A second advertisement offered "two men and a truck for \$63.99 per hour." I
- 3. On June 25, 2013, Staff sent an email to citytocitymovers1@gmail.com requesting an estimate for a move from a two-bedroom home in Bremerton to a house in Port Orchard. Additionally, Staff asked for the company to provide its license information. On the same day, Staff received an email response from Casandra Pugh saying that the company operates under the business license of

¹ See Attachment A for Craigslist advertisements for City to City Movers, printed June 24, 2013.

"Cope Quality Services." Casandra also quoted \$83.99 per hour for a move taking place Sunday through Thursday and an additional \$10 per hour for a weekend move. She wrote, "this rate covers your truck, gas, mileage, and labor all included, no hidden fees..."

- 4. Staff searched records related to Casandra Pugh d/b/a City to City Movers and Cope Quality Services to determine whether the company held a household goods permit. According to Commission records, as of March 3, 2014, there is no record of Casandra Pugh d/b/a Movers Plus or Cope Quality Services now (or ever) holding a household goods permit.
- 5. According to the Washington Department of Revenue's business licensing service, "Cope Quality Services" is a janitorial services company governed by Carrie LeAnn Creech. The company's business and mailing address are 286 NE Max William Loop, Poulsbo, WA 98370. An internet search of Cope Quality Service reveals a telephone number of 360-525-7025. A review of Carrie Creech's Facebook profile reveals that she is Casandra Pugh's mother.
- 6. On July 8, 2013, Staff sent a compliance letter to Casandra Pugh d/b/a City to City Movers, at 3060 NE McWillams Rd., Trlr 23, Bremerton, WA 98311 and Carrie LeAnn Creech, at 286 NE Max William Loop, Poulsbo, WA 98370, (1) outlining the licensing process for household goods movers, directing Casandra Pugh and Carrie LeAnn Creech to (2) become licensed within a reasonable time, (3) cease unpermitted operations, and (4) outlining the consequences of operating as an unpermitted household goods mover in Washington state. Ms. Pugh and Ms. Creech were required to respond or apply by July 22, 2013.
- 7. On July 15, 2013, Staff received a call from Carrie Creech about the compliance letter. She told Staff that she did not know what it was about because her company, Cope Quality Services, does not provide household goods moves. She said she thought her daughter was operating a moving company, but doesn't understand why she received the letter.
- 8. On the same day, Staff received another call about the compliance letter from Casandra Pugh. Casandra told Staff that her mother told her about the letter, but that she didn't receive it, because it was sent to the wrong address. Staff explained that she needed a permit to operating a moving company in Washington. Casandra said she was providing moving labor and doesn't own any trucks. Staff told her that she must make that clear in her advertisements. Staff asked for a new address, and was provided: 4898 Driftwood Dr., Bremerton, WA 98312. Staff mailed a copy of the compliance letter to the new address for Casandra Pugh.

² See Attachment B for a copy of the Department of Revenue registration for Carrie LeAnn Creech d/b/a Cope Quality Services.

- 9. On December 23, 2013, Staff conducted an internet search for advertisements for Cope Quality Services, City to City Movers, and the telephone number 360-525-7025. Staff found a Craigslist advertisement for "Moving We Do it All" and "We will do the full service move for you at a low price...Call Cope Quality Service 360-525-7025."
- 10. On March 5, 2014, after confirming that no permit application had been submitted for "Cope Quality Services" or "Carrie Creech," I conducted another internet search. I found an advertisement on a http://seattleinfo. mmzuche.com offering two moving packages. Both packages state "Your truck" but then state, "mileage and gas are included up to 20 miles," and list the size of trucks according to package prices.³
- 11. On March 5, 2014, I called 360-525-7025 and asked if I had reached a moving company, the person answering said "yes," but Carrie was not available, and asked me to call back in ten minutes. I called back and the telephone was answered by "Carrie." I told her I was interested in moving my aunt from a three bedroom in Bremerton to Gig Harbor. Carrier told me they had two packages. The first was four men and a truck with all the supplies for \$90 per hour, including tax with a three hour minimum. The second was the same, but with three men for \$85 per hour. She then offered to help me pack my aunt, since her business was mostly helping the elderly. When I asked her if she would be doing the actual moving she said, "No, my friend Rickey does the moving for me." When I asked if he had a business name, she told me it was "Right Choice Movers."

DATED this 20th day of March, 2014, at Olympia, Washington.

³ See Attachment C for the

Attachment A

LOW COST MOVERS>>>CLICK HERE>>>DISCOUNTS (LOAD/UNLOAD (LABOR ONLY))



YOU RENT A TRUCK FROM ANY TRUCK RENTAL COMPANY...

WE DO THE LABOR AND YOU SAVE A LOT OF MONEY!!!

((We are not affiliated with budget or U-Haul))

WE TAKE CARE OF OUR CUSTOMERS FROM (((HELLO!!!)))

MOST COMPETITION AROUND CHARGE FOR THIS & THAT..MAKING IT ALMOST IMPOSSIBLE FOR SOME CUSTOMERS TO RECEIVE MOVING HELP @ AN AFFORTABLE PRICE!!

THATS WHERE LOW COST MOVERS COME INTO HELP..WE GIVE DISCOUNTS...WE WORK WITH YOUR BUDGET!!NOT TO MENTION YOUR BACK...WHAT ARE YOU WAITING FOR

http://seattle.craigslist.org/kit/lbs/3841144175.html

6/24/2013

CALL RIGHT NOW TO BOOK YOUR NEXT BEST MOVE!!

CASANDRA 206-788-7120

https://www.facebook.com/citytocitymovers Like us on Facebook CLICK LINK ABOVE

citytocitymovers1@gmail.com

Professional Movers and Affordable Prices!! Packing, Moving, & Cleaning Packages ASK TODAY!! @ LOW LOW MONEY SAVING PRICES!!!

- Location: LOAD/UNLOAD (LABOR ONLY)
- · it's NOT ok to contact this poster with services or other commercial interests

Posting ID: 3841144175 Posted: 2013-05-31, 11:32AM PDT Updated: 2013-06-22, 11:57AM PDT

No contact info?

if the poster didn't include a phone number, email, or other contact info, craigslist can notify them via email. Send Note!

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Need packers? MOVING??? Need Cleaners? Need Labor & Truck (Call us now 206-788-7120 Bundle & Save)

Licensed, Bonded, & Insured!! Need insurance, we got you covered.

https://www.facebook.com/citytocitymovers

Like us on Facebook CLICK LINK ABOVE

citytocitymovers1@gmail.com

Have faith in my guys, this is their livelihood and take pride in what they do!

I supply all the tools to disassemble and re-assemble furniture, have all the commercial blankets, dollies, push carts, straps, ropes etc, for a smooth move!

NO HIDDEN FEES

NO CHARGE FOR GAS, OR MILEAGE!!

SENIOR & MILITARY DISCOUNT, PLEASE ASK!!

Call or text Casandra @ 206-788-7120

★ BIG OR small WE MOVE IT ALL! ★

- · Location: Call us now 206-788-7120 Bundle & Save
- · it's NOT ok to contact this poster with services or other commercial interests

Posting ID: 3883948218 Posted: 2013-06-20, 1:12PM PDT Updated: 2013-06-24, 11:28AM PDT

No contact info?

if the poster didn't include a phone number, email, or other contact info, craigslist can notify them via email.

Send Note!

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FORMAT: mobile regular

http://seattle.craigslist.org/kit/lbs/3883948218.html

6/24/2013

Attachment B

may be registered with other agencies in the state.

Washington State Department of Revenue State Business Records Database Detail

TAX REGISTRATION NO: 602458422

ACCOUNT OPENED: 03/01/2013 12:00:00 AM

602458422

ACCOUNT CLOSED: OPEN

ENTITY NAME:

CREECH CARRIE L

DUSINESS NAME:

COPE QUALITY SERVICES

MAILING ADDRESS:

286 NEMAX WILLIAM LOOP

ENTITY TYPE: SOLE PROPRIETOR

BUSINESS LOCATION:

286 NEMAX WILLIAM LOOP POUL\$80, WA 98370-9162

POUL580, WA 98370-9162

RESELLER PERMIT NO: N/A

PERMIT EFFECTIVE: PERMIT EXPIRES:

N/A

NAICS CODE: 561720

NAICS DEFINITION: JANITORIAL SERVICES

FOR NON-COMMERCIAL USE ONLY

Attachment C

CL > seattle > seattle > all services offered > labor & moving



X flag

Posted: 16 days ago

MOVING WE DO IT ALL (PACK CLEAN ORGANIZE)



LET US TAKE CARE OF IT ALL!
WE WILL DO THE FULL SERVICE MOVE FOR YOU AT A LOW PRICE PACKING
MOVING
UNPACKING
ORGANIZING
CLEANING
EVEN THE YARD WORK
LICENSED BONDED AND INSURED
CALL COPE QUALITY SERVICE 360-525-7025

- Location: PACK CLEAN ORGANIZE
- do NOT contact me with unsolicited services or offers

post id: 4233427987 posted: 16 days ago updated: 6 days ago email to friend ♥ best of

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Attachment D

"...loads of fun!"



PACKAGE A: YOUR TRUCK UP TO 17 FT LONG 2 MEN ALL GAS AND MILEGE INCLUDED UP TO 20 MILES ROUND TRIP \$70.00 PER HOUR.. 3 HOUR MINUMUM PACKAGE B:YOUR TRUCK UP TO 17 FT LONG 3 MEN ALL GAS AND MILEGE INCLUDED UP TO 20 MILES ROUND TRIP \$5.00 PER HOUR.. 3 HOUR MINUMUM PACKAGE C:YOUR TRUCK STARTING AT 24FT UP TO 26FT 2 MEN ALL GAS AND MILEGE INCLUDED UP TO 20 MILES ROUND TRIP \$80.00 PER HOUR.. 4 HOUR MINUMUM PACKAGE D:YOUR TRUCK STARTING AT 24FT UP TO 26FT 3 MEN ALL GAS AND MILEGE INCLUDED UP TO 20 MILES ROUND TRIP \$95.00 PER HOUR.. 4 HOUR MINUMUM ALL PACKAGES INCLUDE ~APPLIANCE DOLLYS~MOVING PADS~*MILEAGE between 21 up to 60 ON A ROUND TRIP WILL BE A ONE TIME CHARGE IN THE AMOUNT OF PACKAGE HOURLY RATE ex; if you pick package A you pay \$70.00 one time additional fee if you go over 20 miles round trip. You receive up to 60 miles total round trip included in this fee. *We offer packing and cleaning for additional fees. When bundling services the more you bundle the more you save..*PACKING MATERIALS AND SUPPLIES ARE NOT PROVIDED WITH OUR PACKING SERVICES TAXES ARE INCLUDED IN OUR PRICES.PIANO CHARGED SEPERATE STARTING AT 200.00WE ACCEPT CASH~ATM DEBIT CREDIT AND ANY MAJOR CC.WE LOOK FORWARD TO MOVING YOU!!!Call Carrie 360-525-7025

· AdChoices [D-

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► Sewing Embroidery

▶ Sewing Machine

▶ Janome Embroidery

Tags: MOVING? CALL US! (360-525-7025)

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http://seattleinfo.mmzuche.com/moving-call-us-360-525-7025/seattle/

3/5/2014