

AFFIDAVIT

State of Washington)

County of Thurston)

I, Margaret M. Vogeli, deposes and says that I am a custodian of the records for the Limousine Program, Business and Professions Division, Department of Licensing, Olympia, Washington, and I do hereby certify that the attached documents are true and correct copies of the STATEMENT OF CHARGES in the matter of case file 2010-08-0604-00LIM.

Dated this 26th day of January, 2012.


Margaret M. Vogeli

I, Margaret Vogeli, certify that I mailed a copy of this document, postage prepaid, to all parties or their counsel of record. I certify under penalty of perjury, under the laws of the State of Washington, that the foregoing is true and correct.

Dated: 3/23/2011 at Olympia WA.

By: Margaret Vogeli

**STATE OF WASHINGTON
DEPARTMENT OF LICENSING
BUSINESS AND PROFESSIONS DIVISION**

In the Matter of the Limousine Carrier
License and Vehicle Certificate of:

NO. 2010-08-0604-00LIM

STATEMENT OF CHARGES

Kevin Timothy Williams, Excalibur
Limousine, LLC d/b/a Seattle Green Limo
d/b/a A Green Limo Service d/b/a A Green
Sedan Service d/b/a A Seattle Green Limo
d/b/a Excalibur Limousine, d/b/a
SeattleGreenLimo.Com

License No. 602-928-398-001-0001

Respondent.

TO: KEVIN TIMOTHY WILLIAMS
AND TO: EXCALIBUR LIMOUSINE
AND TO: SEATTLE GREEN LIMO
AND TO: A GREEN LIMO SERVICE
AND TO: A GREEN SEDAN SERVICE
AND TO: A SEATTLE GREEN LIMO
AND TO: EXCALIBUR LIMOUSINE
AND TO: SEATTLEGREENLIMO.COM

NANCY SKEWIS is the Administrator of the Master License Service for the Business and Professions Division, Department of Licensing (hereinafter Department), and makes this Statement of Charges in that capacity:

Jurisdiction of this proceeding is based on Chapter 18.235 RCW, Uniform Regulation of Business Professions, Chapter 34.05 Revised Code of Washington (RCW), the Administrative Procedure Act, Chapter 10-08 WAC, the Model Rules of Procedure, Chapter 308-08 Department of Licensing Practice and Procedure, Washington Administrative Code (WAC), Chapter 46.72A RCW, and Chapter 308-87 WAC.

I. LICENSE HISTORY

1.1 Kevin Timothy Williams, Excalibur Limousine, LLC d/b/a Seattle Green Limo d/b/a A Green Limo Service d/b/a A Green Sedan Service d/b/a A Seattle Green Limo d/b/a Excalibur Limousine, d/b/a SeattleGreenLimo.Com, Respondent, holds a license to practice as a Limousine Carrier. Respondent has been licensed as a Limousine Carrier at all times relevant to this action under license number 602-928-398-001-0001. Respondent also holds limousine vehicle certificates number 4149 issued on August 14, 2009 for a 2001 Ford Excursion Washington license plate number B93650P, VIN 1FMSU43F91EC08379 and number 4150 issued on August 14, 2009 for a 2002 Ford Excursion with Washington license plate number B73426L, VIN 1FMSU43F52EC53725 under original decal number 2845.

II. ALLEGED FACTS

2.1 Program Manager, Harumi Tolbert emailed the Respondent on October 14, 2009 Ms. Tolbert asked Mr. Williams to contact her regarding the fact that his Mercedes E320 (vehicle mentioned in Section 2.4) does not the minimum wheelbase requirements, even though the Washington State Patrol had previously allowed the E320 to pass inspection.

2.2 On October 15, 2009, Ms. Tolbert received a response email from Respondent. He stated that there was nothing to discuss since three of his Mercedes E320s had passed the Washington State Patrol inspection

2.3 On October 16, 2009, Ms. Tolbert responded. Ms. Tolbert requested that Respondent make an appointment with the Washington State Patrol to have the Mercedes vehicles inspected again. Ms. Tolbert requested that Respondent inform her of the appointment date and time. Respondent did not notify Ms. Tolbert of the inspection date and time.

2.4 In June 2010, the agency checked the Respondent's business website seattlegreenlimo.com, and determined he was advertising for hire operation of Mercedes E-320 vehicles as limousines for hire. Mercedes E-320 do not meet the minimum wheel base requirement required by WAC 308-87-010 (1) (b).

2.5 On June 9, 2010 Respondent came to the public service counter to renew his limousine carrier license and vehicles. Master License Service staff person Virginia Gleason was called to the counter because Respondent did not have a Washington State Patrol inspection form for the Mercedes mentioned in Section 2.1 above. When asked where the form was, Respondent stated he hadn't had the inspection done yet. Ms. Gleason informed Respondent that she had spoken with the State Patrol and the Mercedes would not be inspected because it did not meet the wheelbase requirements. Respondent stated he was still working on getting the vehicle inspected.

2.6 On September 29, 2010 and October 11, 2010, information was received from a Ground Transportation agent for the Port of Seattle that indicated on July 13, 2010, the Respondent was issued a citation for operating a Black Mercedes, VIN WDBUF26J45A800862 and license plate B71949K (replaced by B94296P), as a limousine without a Port of Seattle Limousine Permit or a Department of Licensing Limousine Carrier certificate (DOL) decal. According to the agent, he spoke with the Respondent shortly after this incident and the Respondent stated he was not using this vehicle for passenger pick-ups any longer.

2.7 On September 29, 2010 and October 11, 2010, information was received from a Ground Transportation agent for the Port of Seattle that indicated, on August 25, 2010, the Respondent was issued a citation for operating the same vehicle referenced in Alleged Fact 2.5 as a limousine without a DOL decal or Port of Seattle Permit. According to the agent, the vehicle's driver was wearing a black chauffeur suit and was observed loading passengers.

2.8 On October 13, 2010, information was received from Ground Transportation Agent for the Port of Seattle that indicated on October 12, 2010, the Respondent was issued a citation for operating the same vehicle referenced in Alleged Facts 2.5 and 2.6 as a limousine without a DOL decal or Port of Seattle Permit. According to the agent's information, the driver of the vehicle was observed loading a passenger and admitted that he worked for the Respondent and that the vehicle was being used as a taxi (for hire).

2.9 The Department's Vehicle/Vessel database lists the vehicle referenced in Alleged Facts 2.2, 2.3 and 2.4 as a 2005 Mercedes E-320, VIN WDBUF26J45A800862, with registered

owner of the vehicle as Respondent Kevin Timothy Williams. Respondent does not hold a limousine vehicle certificate or vehicle liability insurance for this vehicle.

III. ALLEGED VIOLATIONS

3.1 The facts and circumstances alleged in paragraph 2.4 above establishes a violation of RCW 18.235.130(11), misrepresentation of any aspect of the conduct of the business or professions.

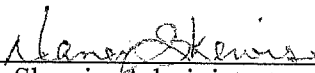
3.2 The facts and circumstances alleged in paragraphs 2.5 through 2.8 above establish violations of RCW 46.72A.050, RCW 46.72A.060 and RCW 46.72A.070(3)(a); operating a vehicle as a limousine without a vehicle certificate, failure to file with the Department and maintain vehicle liability insurance for each vehicle used as a limousine, and operating a vehicle as a limousine without first obtaining a vehicle certificate.

3.3 The violations described in paragraphs 3.1 and 3.2 constitute unprofessional conduct and are grounds for disciplinary action, including revocation, suspension, or refusal to renew Respondent's limousine carrier license, and/or the imposition of a civil monetary penalty under RCW 18.235.110(1).

IV. REQUEST FOR SANCTIONS

WHEREFORE, NANCY SKEWIS, knowing the contents of the foregoing and believing them to be true, and based upon the conduct of the respondent as described above, requests that the Limousine Carrier license of Kevin Timothy Williams, Excalibur Limousine, LLC d/b/a Seattle Green Limo d/b/a A Green Limo Service d/b/a A Green Sedan Service d/b/a A Seattle Green Limo d/b/a Excalibur Limousine, d/b/a SeattleGreenLimo.Com be suspended, revoked, or other disciplinary measures be taken pursuant to RCW 18.235.110.

DATED this 23rd day of March, 2011.



Nancy Skewis, Administrator
Master License Service
Business & Professions Division

We are committed to providing equal access to our services.
If you need accommodation, please call (360) 664-1379 or TTY (360) 664-0116.