

From: steve@go-vip.us
To: [UTC DL Records Center](#); [Pearson, Rayne \(UTC\)](#); [Perkinson, Mathew \(UTC\)](#); [Roberson, Jeff \(UTC\)](#)
Cc: [GO VIP; stevevalentinetti@hotmail.com](mailto:stevevalentinetti@hotmail.com)
Subject: TE-161295 GO VIP Request for Formal Hearing and or WAC 480-07-830 Motion to reopen the record prior to entry of a final order. 5-24-2017 @ 13:00
Date: Wednesday, May 24, 2017 12:53:22 PM
Attachments: [Request for Formal Hearing GO VIP +1.docx](#)
[Request for Formal Hearing GO VIP.docx](#)
[Safety Comparison Chart.docx](#)
[Evidence to present WUTC.docx](#)
[9-15-Passenger_Vehicle_Brochure_508.pdf](#)

Please accept (TE-161295) this as GO VIP's official Request for a Formal Hearing and or WAC 480-07-830

- Request for Formal Unrestricted Hearing Doc
- Request for Formal Hearing +1 Doc
- Safety Comparison Doc
- Evidence to present Documents
- 9 to 15 passenger vans DOT brosure Doc
- DOT e-mails



AMI Coaches 24 PAX Bus, 3 photos above =

- CDL License w/ Passenger endorsement required, yes this is a CMV
- Drug and Alcohol testing – yes Proven with Certificate of enrollment from U.S. Health Works
- 5 Million Insurance – yes w- Policy, Certificate, cab card, MCS-90b and live testimony by Doug Ferguson
- FMCSA Authority – yes
- WUTC Authority - yes

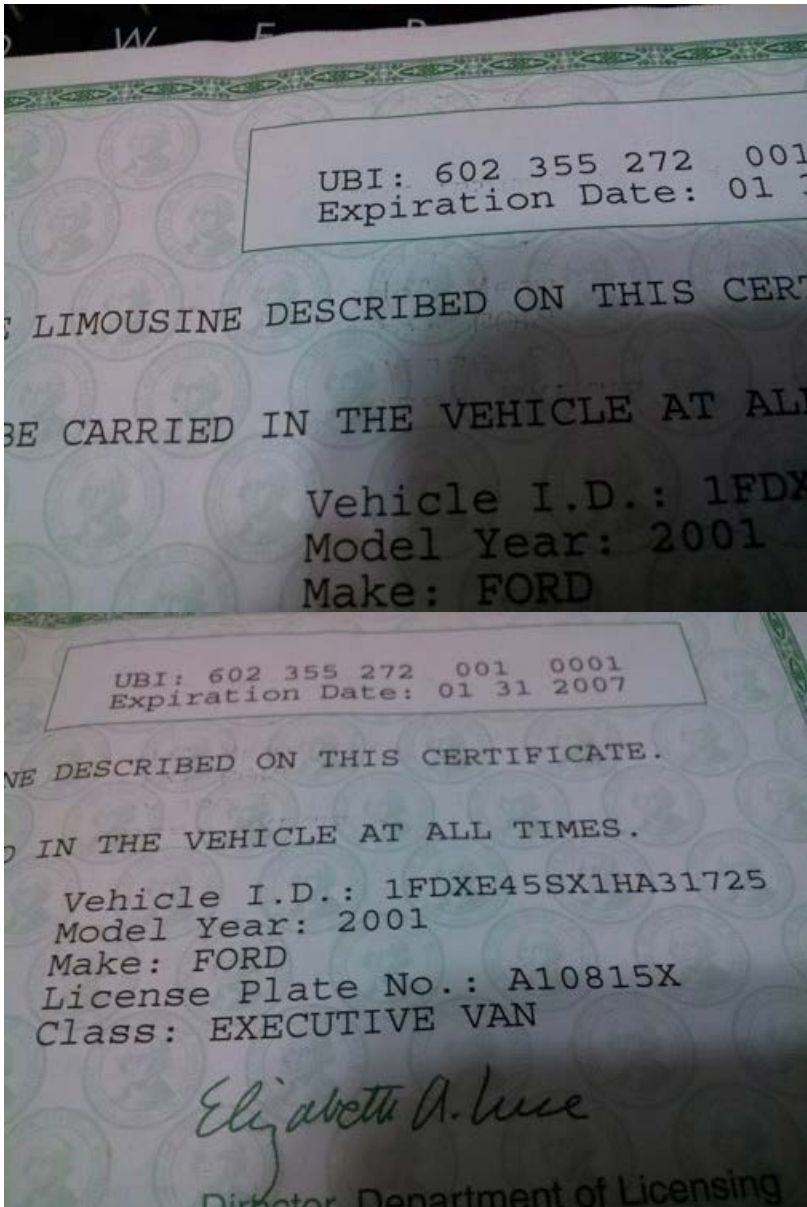


Airline Shuttle 14 PAX van Vin #1725 photos Above w/ flight crew

- CDL license w/ passenger endorsement – Not needed however both Airline Shuttle drivers had CDL class A's
- Drug and Alcohol testing – Not needed however both Airline Shuttle drivers were

entered in 2 different Drug and Alcohol testing programs including Airline Shuttles.
Proven with Certificate of enrollment from U.S. Health Works

- 1.5 Million Insurance – yes w- Policy, Certificate & live testimony by Doug Ferguson
- FMCSA Authority – No, Not needed, Airline Shuttle is a non-CDL hotel van for flight crews only. 49 USC 13506
- WUTC Authority – No, not needed, Airline Shuttle is a non-CDL hotel van for flight crews only. WAC 480-30-011
- Washington State Limousine license for the above 14 passenger van (vin 1725) - 2 photos below



Does the WUTC have jurisdiction over Limousines? Answer – NO, The Washington State Patrol does (Vin 1725)

DOT's airport attack in front of Flight Crew claiming Airline Shuttle is not authorized to transport (Vin 1725, 14 PAX van) after 1 hour hold no violations issued.



AMI Coaches “Emergency Service Van” chains up AMI buses on Snoqualmie Pass then helps the other bus companies for FREE



Steve Valentinetti – AMI Coaches, Airline Shuttle, GO VIP’s owner.....accident free 24 years, put **out of business forever with false violations and without review.**



Things for the DOT to think about

- Was it for Safety? No complaints, No accidents in 24 years, proved AMI had 5 million insurance, proved 1.5 for Airline Shuttle, proved Drug & Alcohol in place for both AMI and Airline Shuttle
- Amtrak, Amazon, Sounders, American Airlines, Delta Airlines, United Airlines didn't complain about service, equipment or driving.
- **The WUTC staff makes the following allegations** based on its review and investigation – **Did the WUTC or the FMCSA investigate or review?** The DOT uses damaging without merit language stating Steve Valentinetti –
 - “made a fraudulent intentionally false entry”
 - “mask or conceal the history of noncompliance”
 - **“evade the orders forbidding AMI and Airline Shuttle from operating”** **The DOT now admits nothing we present or do will be accepted by the DOT,** these hearings are simply a fishing expedition to evaluate how much trouble the State is in for its undeniably poor judgement.
 - “permitted”, “failed” “engaged”
 - “history of Non-Compliance”
 - “history of violating federal regulations governing safe operations and insurance requirements”
- So what happened here?
- Could it be Business interruption
- Differential Treatment
- Discrimination
- **Could it be DOT's (WUTC's David Pratt, Director of Transportation Safety) trying to manipulate Amtrak Federal Contracts and he got caught, (see May 15, 2013 letter from Pratt to Rob Eaton, Director of Government Affairs Amtrak, Pratt cites 49 USC 13501)** now the DOT is trying to protect him and cover for the other corrupt operations. (also see AMI Coaches 2-25-2013 Decisions MC-816340, April 1st 2013 & April 29th 2013)
- If the lies, false violations and keeping Steve Valentinetti out of business isn't to protect the State from exposure it must be just straight up discrimination and differential treatment, is there another reason?

The DOT shutting SV's companies down issued these false violations;

- **49 CFR 382.305 FEDERAL ACUTE** Failing to implement Random Controlled substance and/or alcohol testing program.....False, both AMI and non-CDL Airline Shuttle “not required” had and proved to WUTC at TE-161295 that we had “Pre-employment, Random and suspicion Drug & Alcohol testing.
- **49 CFR 387.31(a) Acute** Operating a passenger carrying vehicle without having in effect the required minimum levels of financial responsibility.....False, both AMI and non-CDL Airline Shuttle “not required” had and proved to WUTC at TE-161295 that we had 5 Million and 1.5 Million respectively.
- **49 CFR 387.31(d) Critical** Failing to maintain at principal place of business required proof of financial responsibility.....False, Policy, Certificate, MCS-90b and the personal testimony of Commercial Insurance company owner Doug Ferguson provided at TE-161295
- **49 CFR 391.51(a)** Failing to maintain driver qualification file on each driver employed.....False, Steve Valentinetti, owner of both companies redacted only his birth date so personal & business banking could not be compromised. SV provided his Enhanced WDL CDL class A, Med Card to investigator who wrote the violation stating “Airline Shuttle doesn't keep drivers files”

- **49 CFR 395.8(a)** Failing to require driver to make a “Record of Duty Status”.....False, a hotel van (non-CDL) is not required to complete ROD’s.
- **49 CFR 395.8(k)(1)** Failing to preserve ROD’s supporting documents for 6 months..... False, a hotel van (non-CDL) is not required to complete ROD’s or preserve ROD’s.
- **49 CFR 396.3(b)** Failing to keep minimum records of inspection and vehicle maintenance.....False, Airline Shuttle and AMI Coaches both presented annual inspections to the investigator. The Airline Shuttle 14 PAX Non-CDL Van had not been inspected by the FMCSA and it doesn’t need to be. **Note to WUTC – If every vehicle CDL or not is under the jurisdiction of the FMCSA then there is no need for the WUTC.**
- **49 CFR 396.11(a)** Failing to require driver to prepare driver vehicle inspection report (DVIR).....False, Airline Shuttles Non-CDL 14 passenger van is not required to prepare or keep DVIR’s.
- **49 CFR 396.17(a)** Using a commercial motor vehicle not periodically inspected.....False, not inspected by the FMCSA because it is a hotel van and is not required to be inspected by the FMCSA see 49 USC 13506
- **49 CFR 382.301(a)** Using a driver before the motor carrier has received a negative pre-employment controlled substance test result.....False, our driver were all school bus drivers and provided negative pre-employment results and within 30 day tested for Airline Shuttle as well as entered into AMI Coaches random pool.
- **49 CFR 391.51(b)(2)** Failing to maintain inquires into drivers driving record in drivers qualification file. Driver cited was Jim Mondry. Carrier did not retain original driver abstracts.....False, Jim Mondry was hired before there was an FMCSA (1998)
- **49 CFR 395.8(a)** Failing to require driver to make “Record of Duty Status”.....False, each driver filled out a DVIR included his or her time card. We are a bus company and operate within 100 air mile and are not required to log book.
- **49 CFR 395.8(k)(1)** Failing to preserve ROD’s supporting documents supporting documents for 6 months. Intercruises Charter bus trip slip is returned to Intercruises.False
- **49 CFR 396.17(a)** Using a CMV not periodically inspected, violation date 9-27-2013.....False, WUTC’s own Ray Gardner inspected Unit #2 November 2012. **Look it up by the CVSA number 17971576**





- **49 CFR 395.8(a)** Failing to require driver to make a record of duty status. Driver Mike Burdick worked for Horizon Coach Lines (9-14-2013) and failed to disclose with 7 day work week sheet.
- **49 CFR 395.8(k)(1) STATE CRITICAL** Failing to preserve ROD's supporting documents supporting documents for 6 months..... False, Intercruises is the company that gets the Charter bus slips and pays the bill. **Same violation as above**
- **49 CFR 382.601(b) 1-11 Federal** Failed to provide to employees a written policy on misuse of alcohol and controlled substances.....Written policy did not have employers representative on it.....
- **AMI Coaches Jurisdiction**, the largest violation carrying a \$25,000 fine. that the WUTC forgot to include in its rejection letter because it was the WUTC's David Pratt who started this deception and made the knowingly false accusation.....that the FMCSA adopted and placed AMI Coaches out of business.

So now the DOT is 0 for 18 violations yet they won't allow a hearing or investigation and are still trying to keep Steve Valentinetti "out of business" unless he falsely admits to violations not committed releasing the State of Washington from liability. (see DOT Judge Pearson openly admits in "Intent to Deny application TE-161295) The DOT will be exposed as Corrupt, Discriminating and Falsifying government organization. The public will be disappointed and will find it hard to put their faith in the DOT for things like HOV tolling, the tunnel project, King County Metro, the Ferry system or the judicial system.

When Valentinetti asked WUTC Judge Rayne Pearson (TE-161295) if we have presented sufficient evidence proving AMI Coaches and Airline Shuttle have the required amount of insurance and proof of the required amounts by physical presenting the Policy, Certificate of Insurance, cab card & MCS-90b as well as live testimony from Douglas Ferguson (39 year owner of Ferguson & Associates)

Pearson stated **"it is not enough"** What do the other companies that are being investigated produce?.....Differential Treatment is placed on Valentinetti. Other companies show any of the above, Policy, Certificate or MCS-90b if appropriate. Valentinetti had all 3 including live testimony from the man who wrote the policy however for the corrupt WUTC it is not enough.

WUTC's Mathew Perkison admitted at TE-161295 the WUTC does not have Jurisdiction over Airline Shuttle.

Mr Perkison testified he is trained in both State and Federal Laws.

Mr Perkison testified that the WAC's and the RCW's follow and parallel the Federal law' CFR's and USC's and Airline Shuttle is not under the Jurisdiction of either the FMCSA or the WUTC.

The DOT just talks but is unable to prove any of the assessed violations. DOT Judge Sullivan just wrote a 14 page brief on why her fax machine doesn't work and that she is unable to operate a computer but purports herself as a CFR & USC expert after 6 years even though her Judicial colleges call her useless dead weight just taking up space. Sullivan never addresses violations or why regardless of what evidence we try to admit she blocks or why she believes the DOT is correct. She does however state how she changed the dates, times and titles on our submissions and that she didn't receive it on time. Everyone else did, Van Steinberg, Slater, records. That's why we send it to everyone.

Sullivan stated early on "I'm going to do something special" block all discovery after Airline Shuttle produced answers to all discovery requests and the FMCSA answered none.

Yes, the DOT is a corrupt government organization from the bottom to the top and endorses modern day discrimination with the USC's CFR's, WAC's, RCW's having different meanings for different people.

DOT Judge Pearson's statement "Overall, Mr. Valentinetti's statements demonstrate a lack of candor, a fundamental inability to accept responsibility for his conduct, a blatant disregard for safety regulations, and **a profound disrespect for government regulators**. Accordingly, we find that he cannot be trusted to provide charter party and excursion carrier services consistent with the public interest".

Note to Pearson – Mr. Valentinetti disrespects ANYONE that is dishonest, corrupt, discriminatory, racist or protects those who are. We are ashamed of the DOT.

Mr. Valentinetti especially takes offense to AAG Roberson making fun of his heritage.

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