

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of Determining the Proper)	DOCKET TV-143185
Carrier Classification of, and Complaint for)	
Penalties against:)	
)	DECLARATION OF
DOODY, CAMERON, ADAM HANEY,)	MEGAN BANKS
MATT PATTERSON, AND STEPHEN)	
VLAHOS d/b/a CAMPUS BELLHOPS LLC)	
_____)	

Megan Banks, 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 and transportation companies. As part of those duties, I investigate household goods carriers that may be operating without the required Commission permit.
2. I began an investigation into the activities of Cameron Doody, Adam Haney, Matt Patterson, and Stephen Vlahos d/b/a Campus Bellhops LLC in July 2014 after finding an advertisement on www.craigslist.org offering moving services. The advertisement included a telephone number, (888) 836-3939 and a website, www.getbellhops.com.¹
3. I reviewed Commission records related to Cameron Doody, Adam Haney, Matt Patterson, and Stephen Vlahos d/b/a Campus Bellhops LLC to determine whether the company held a household goods permit. According to Commission records, as of August 20, 2014, there is no record of Cameron Doody, Adam Haney, Matt Patterson, and Stephen Vlahos d/b/a Campus Bellhops LLC now (or ever) holding a household goods permit.
4. On July 3, 2014, I conducted an Internet search for advertising for Campus Bellhops LLC. I found advertisements on www.craigslist.org and getbellhops.com/market/seattle-washington offering “licensed, insured &

¹ See Attachment A for advertisements for Campus Bellhops, printed on July 2, 2014.

bonded movers.” The company’s website stated, “Bellhops provides trucks as well from local truck rental companies, which allows us to become a full service moving company and can handle all local A to B moves in Seattle, WA.”² In addition, the website links to an outside website that lists the company’s founders as Stephen Vlahos, Matt Patterson, Adam Haney, and Cameron Doody.³

5. On July 3, 2014, I conducted an Internet search of the Tennessee County Clerk’s Business Listings for Campus Bellhops. The search produced a listing for Campus Bellhops and lists the owner as Stephen Vlahos.⁴
6. On July 3, 2014, I sent an instant message through the company’s website, getbellhops.com, requesting an estimate for a move from a two-bedroom apartment to another within Seattle. “Nate” told me it would cost \$40 per worker, \$135 for the truck, and he said there was an hour and a half minimum.”⁵
7. On July 14, 2014, commission staff sent a compliance letter to Cameron Doody, Adam Haney, Matt Patterson, and Stephen Vlahos d/b/a Campus Bellhops LLC at 800 Market Street, Suite 200, Chattanooga, TN 37402, (1) outlining the licensing process for household goods movers, directing Cameron Doody, Adam Haney, Matt Patterson, and Stephen Vlahos 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. Mr. Doody, Mr. Haney, Mr. Patterson, and Mr. Vlahos were required to respond or apply by August 7, 2014.
8. On August 14, 2014, and again on August 20, 2014, I confirmed that the commission’s compliance letter was not returned, and that licensing staff had received no permit application for “Campus Bellhops LLC.” An Internet search on August 14, 2014, produced four advertisements for the company’s household goods moving services posted on www.craigslist.org between August 7, 2014, and August 13, 2014. An additional Internet search on August 20, 2014, produced four advertisements for the company’s household goods moving services posted on www.craigslist.org between August 12, 2014, and August 19, 2014.⁶ In addition, on August 21, 2014, a coupon was

² See Attachment B for a copy of the company’s website, www.getbellhops.com, printed on July 3, 2014.

³ See Attachment C for a copy of the company’s information from angel.co/bellhops/jobs.

⁴ See Attachment D for a copy of the company’s information on file with the Tennessee Hamilton County Clerk’s Office.

⁵ See Attachment E for a copy of the instant message conversation between a Campus Bellhops representative and myself on July 3, 2014.

⁶ See Attachment F for advertisements for Campus Bellhops on www.craigslist.org printed on August 14, 2014, and August 20, 2014.

found on www.groupon.com for “Bellhops” offering \$80 worth of services for \$40.⁷

9. On August 26, 2014, I emailed the email address on the company’s website, dingding@getbellhops.com, and requested an estimate for moving within Seattle. On the same day, I received a response from “Branton Phillips” stating that the costs are \$40 an hour per worker, with an hour and a half minimum. He also said it would cost an additional \$135 for a truck.

DATED this 23 day of September, 2014, at Olympia, Washington.


MEGAN BANKS

⁷ See Attachment G for coupon from www.groupon.com printed on August 21, 2014.

Attachment A

Great UW student movers!!

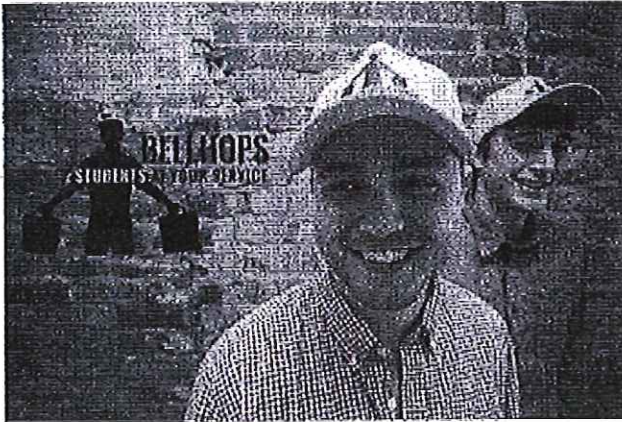
Page 1 of 1

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

[account]

reply  Posted: an hour ago

Great UW student movers!! (Seattle)



4508 19th ave ne
(google map) (yahoo map)

Bellhops employs awesome college students from UW to serve the small-scale local moving needs of Seattle and surrounding areas.

*Use coupon code: GLEASON1 for 5% OFF!!!

- Loading
- Unloading
- Local 'A' to 'B' moving
- Can provide a Uhaul moving truck as needed

Serving over 115 cities in 42 states, our Bellhops provide the most wonderful moving help on earth with fun, respectable and hard working individuals! We're all college students, so you know we are eager to work!

Pricing:

- \$40/hour per Bellhop for labor
- Optional \$135 flat fee if you need us to provide a moving truck from UHaul (we pick up and return the truck and this covers the truck for the whole day plus a dolly, gas, mileage and insurance)
- 1.5 hr minimum

How to Book:

Book us easily ONLINE at www.GetBellhops.com or give us a call at 888-836-3939.

- do NOT contact me with unsolicited services or offers

post id 4550379872 posted an hour ago [email to friend](#) 

© 2014 craigslist [help](#) [privacy](#) [feedback](#) [d.o.s](#) [terms](#) [about](#) [mobile](#)

<http://seattle.craigslist.org/see/lbs/4550379872.html>

7/2/2014

CL > [seattle](#) > [seattle](#) > [all services](#) > [labor & moving](#)

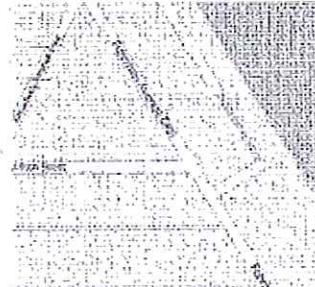
[\[account\]](#)

[reply](#)

[X](#) [prohibited](#)

Posted: 7 days ago

Strong, awesome UW student movers!! (Seattle)



1101 ne campus parkway
[\(google map\)](#) [\(yahoo map\)](#)

Bellhops employs awesome college students from UW to serve the small-scale local moving needs of Seattle and surrounding areas.

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- 1.5 hr minimum

How to Book:

Book us easily ONLINE at www.GetBellhops.com or give us a call at [\(show contact info\)](#)






- do NOT contact me with unsolicited services or offers

post id 4539496379 posted 7 days ago updated 2 days ago [email to friend](#) [♥ best of!](#)

Attachment B

Moving help in Seattle, WA

Page 1 of 3

- Menu
 -  [Book Bellhops](#)
 -  [Bellhops Login](#)
 -  [Join Bellhops](#)
 -  [About Us](#)
 -  [Get Help](#)
 -  [Business Services](#)
 -  [Become an Advocate](#)
 -  [Apply Market Director](#)
 -  [Blog](#)
- [Join Bellhops](#)
- 
- [Book Bellhops](#)
-  [Call 1 \(888\) 836-3939](#)

Need moving help in Seattle, WA?

Our local students can help with your move
[Locations](#) > [WA](#) > [Seattle](#)

Local Moving Help for Your Next Move

Bellhops is a local, affordable moving company that hires trustworthy, local, university students as Bellhops, or movers, for moving labor. We can help load or unload belongings into or out of houses, apartments, dorms (residence halls), storage, UHAULs, PODs or PackRats.

Services We offer

- Local Loading Help in Seattle, WA
- Local Unloading Help in Seattle, WA
- Local A to B Moving in Seattle, WA

<https://getbellhops.com/market/seattle-washington/>

7/3/2014

- Trucks Rentals
- Residential Housing moving/movers
- Licensed, insured & bonded movers

Our movers are local students

Bellhops is proud to use local students in Seattle, WA as our source for local and affordable moving help. Bellhops provides the best moving help in the market for local and campus moving needs. Bellhops is a licensed, insured and bonded, local moving company in Seattle, WA. Because of our efficiency & tech savviness, Bellhops is a perfect fit if you're on a budget and looking for not only an affordable moving company, but a very easy and comfortable experience. Bellhops provides trucks as well from local truck rental companies, which allows us to become a full service moving company and can handle all local A to B moves in Seattle, WA. Simply put, Bellhops is the best Seattle moving company.

Our Seattle, WA students are studying at

- [University of Washington-Seattle Campus](#)

Reserve Bellhops for your move!

[Book Bellhops](#)

Have a Question?

Name *

Email *

Message *

Get In Touch

[1 \(888\) 836-3939](tel:18888363939)

dingding@getbellhops.com

[Having Trouble?](#)



Come work at HQ! [Check out our available positions](#)
Apply to be a Bellhop [Work with your friends!](#)

Let's Be Social



Let's Be Social

© 2014 Bellhops - Moving? Get some... [Terms of Service](#) [Privacy Policy](#)

Attachment C



ABOUT JOBS INVESTORS



Jobs at Bellhops

Book college students to help you move. 100+ cities and growing.

Apply to Bellhops Share



FOUNDERS



Stephen Vlahos



Matt Patterson



Adam Haney

Chief nerd @campusbellhops living and working in #cha



Cameron Doody

Co-founder @Bellhops. Real big on high-fives.

PRODUCT

We're a tech-based company that contracts college students for local moving help, on-demand.
5,000+ Bellhops serving 121 cities and growing.
Think Lyft for small local moving.

WHY US?

Bellhops is seeking a new member for our development team to help change the way that college students find work and move. We've created an automated hiring, managing, and scheduling system that allows our customers to get the help they need from our workforce of college students. We pair program, practice TDD, and learn something new every day. We solve the problems of managing a distributed, part time workforce using a web application and automated telephony system; the system makes sure our customers can get the help they need, when they need it, and that our students can work when they want. Solving these problems means we're working with Geospatial data and services, telephony systems, and, in some cases, integrating with University systems. We strive to make the process of moving painless for customers, while providing solid jobs for our hard working college students.

VITALS

LOCATION Chattanooga

SIZE 11-50 employees

MARKETS University Students, Labor Optimization, Moving

LINKS GetBellhops.com

 Bellhops	<p>Bellhops employs top-tier college students to provide moving services to our customers in local communities in over 122 cities. With thousands of trained student 'Bellhops', access to a nationwide fleet of moving trucks and our fully integrated Online Management System, we're taking small local moving and giving her the People's Elbow.</p> <p>We currently develop in Django, but we'd love to talk to any web developer who's eager to learn. We constantly rotate pair programming partners and love working with each other on creating new, exciting features. We'd love to meet another developer that we'd be excited to learn with. We develop with and contribute to open source software so candidates with open source contributions are especially desirable.</p> <p>BELLHOPS JOBS</p>	
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DEVELOPER

Full Stack Software Engineer

\$60K - \$100K SALARY

0.1% - 0.2% EQUITY

FULL TIME - CHATTANOOGA

MOBILE DEVELOPER

Mobile Team Lead

\$80K - \$100K SALARY

0.1% - 0.2% EQUITY

FULL TIME - CHATTANOOGA

MOBILE DEVELOPER

Mobile Developer

\$60K - \$80K SALARY

0.05% - 0.1% EQUITY

FULL TIME - CHATTANOOGA

[Apply to Bellhops](#)

[Share](#)

TEAM



ABOUT

[JOBS](#)

INVESTORS



Anthony Blardo

Developer at @Bellhops. Infrastructure nerd. Lover of automation. Web development enthusiast

Hunter Gorman

Marketing Assistant @Bellhops and full-time student @Baylor



Ustin Zarubin

Software Engineer at @Bellhops • Studied Physics at @UCA



Jack Bloom

Super-sarcastic designer, I run on root-beer & dark chocolate.



Nathan Sexton

Director of Customer Experience at @Bellhops



Lucky Ramsey

Chatterbox, daily practitioner of sincerity, finder of great talent, rock climber, traveler, ballroom dancer. Work with @Bellhops

[Show All](#)

INVESTORS



Lamp Post Group

ALSO HIRING

Bellhops is one of 4,643 startups hiring on AngelList

[Browse All Startup Jobs](#)

Attachment D



County Clerk's Office
New Business
 Public Information

W.F. (Bill) Knowles - County Clerk

625 Georgia Avenue, Room 201

Chattanooga, TN 37402

Phone: (423) 209-4500 Fax: (423) 209-6561

Hours: Mon - Fri 8:00am-4:30pm except designated holidays

Business Search

Business Reports

Business Name or Address

DBA and Location
 CAMPUS BELLHOPS
 800 MARKET STREET
 SUITE 200
 CHATTANOOGA, TN, 37402

Legal Name and Mailing Address
 CAMPUS BELLHOPS LLC
 800 MARKET STREET
 SUITE 200
 CHATTANOOGA, TN, 37402

Bus. Desc STUDENT MOVERS

812990 All Other Personal Services

Owner(s) VLAHOS, STEPHEN

Class: 3

	Name (DBA)	Location	City	Legal Name	Mailing Address	Mail City
<input type="button" value="Select"/>	CAMPUS BELLHOPS	800 MARKET STREET	CHATTANOOGA	CAMPUS BELLHOPS LLC	800 MARKET STREET	CHATTANOOGA

Send any suggestions about this site to [Site Designer](#)
 ©2014, General Government of Hamilton County

Attachment E

Bellhops

Nate
Customer support

you!

Hey! I noticed you started our three step order process. Please let me know if you have any questions. I'd love to help you walk through this!

You - Click here to change
I don't want to book a move yet, but I was wondering the total costs for a move from Queen Anne to Ballard (within Seattle, WA). I have a two bedroom apart.

Nate joined the chat

Nate
Hey!

Let me make sure we operate in those towns

You - Click here to change
Thx!

Nate
Yai We can definitely help!

We charge \$40/hour per worker (we call them Bellhops). Please note, we have a 1.5 hour minimum job time.

Since your move will require a truck, we charge a \$135 fee for the truck which covers gas, mileage, insurance, dolly, furniture pads and most importantly, not having to worry about renting a truck and paying all the hidden extras.

Ex. If you hired two Bellhops for 2 hours and also ordered a truck, your total cost would be \$295 (\$160 for labor + \$135 for the truck).

Please note, we take a deposit for the first hour for each Bellhop when you make the reservation (fully refundable for any reason). After the job is over, you will pay the remaining balance after you verify the total job time through an email/text we will send you.

You - Click here to change
Awesome! So you provide the truck right? I don't have to do anything about it?

Let me think about this and then I will book it! Thx again!

Nate
Yes we provide the truck for an additional 135 fee

Thanks!

Options • Sign In zoom



Girl From WA <girlfromwa@gmail.com>

Your chat transcript with getbellhops.com on 03 Jul 2014

1 message

Chat Transcript <noreply@zopim.com>
To: girlfromwa@gmail.com

Thu, Jul 3, 2014 at 11:19 AM

Chat Transcript with Visitor 54099094

Chat started on 03 Jul 2014, 03:44 PM (GMT+0)

(03:44:57) *** Visitor 54099094 joined the chat ***

(03:45:02) Customer Service: Hey! If you have any questions about our company, I'd love to answer them for you!

(04:36:11) Customer Service: Hey! I noticed you started our three step order process. Please let me know if you have any questions. I'd love to help you walk through this!

(04:37:22) Visitor 54099094: I don't want to book a move yet, but I was wondering the total costs for a move from Queen Anne to Ballard (within Seattle, WA). I have a two bedroom apart.

(04:37:32) *** Nate joined the chat ***

(04:37:43) Nate: Hey!

(04:37:55) Nate: Let me make sure we operate in those towns

(04:38:07) Visitor 54099094: Thx!

(04:38:38) Nate: Ya! We can definitely help!

(04:38:47) Nate: We charge \$40/hour per worker (we call them Bellhops). Please note, we have a 1.5 hour minimum job time. Since your move will require a truck, we charge a \$135 fee for the truck which covers gas, mileage, insurance, dolly, furniture pads and most importantly, not having to worry about renting a truck and paying all the hidden extras. Ex. If you hired two Bellhops for 2 hours and also ordered a truck, your total cost would be \$295 (\$160 for labor + \$135 for the truck).

(04:39:03) Nate: Please note, we take a deposit for the first hour for each Bellhop when you make the reservation (fully refundable for any reason). After the job is over, you will pay the remaining balance after you verify the total job time through an email/text we will send you.

(04:39:32) Visitor 54099094: Awesome! So you provide the truck right? I don't have to do anything about it?

(04:40:46) Visitor 54099094: Let me think about this and then I will book it! Thx again!

(04:41:16) Nate: Yes we provide the truck for an additional 135 fee

(04:41:21) Nate: Thanks!

(05:01:17) *** Nate left the chat ***

(06:19:18) *** Visitor 54099094 left the chat ***

<https://mail.google.com/mail/?ui=2&ik=802e0e664b&view=pt&search=inbox&th=146fd73...> 7/3/2014

NAME Visitor 54090094
EMAIL -
PHONE -
LOCATION Olympia, United States
URL https://getbellhops.com/market/seattle-washington/

Are you using Zopim Live Chat yet? [Sign up free today](#)

<https://mail.google.com/mail/?ui=2&ik=802e0e664b&view=pt&search=inbox&th=146fd73...> 7/3/2014

Attachment F

seattle labor & moving "bellhops" - craigslist

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CL > seattle >

[\[account\]](#) [post](#)

pic title [\(save/view searches\)](#)

[list](#) [thumb](#) [gallery](#) [map](#)

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[newest](#) [relevant](#)

Aug 13 - Strong, awesome UW student movers!! - (Seattle) [pic](#) [map](#)

Aug 8 - Great UW student movers!! - (Seattle) [pic](#) [map](#)

Aug 7 - Great UW student movers!! - (Seattle) [pic](#) [map](#)

Few LOCAL results found. Here are some from NEARBY areas

Aug 12 - Get Bellhops! Student movers - (Bellingham) [pic](#)

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CL > [bellingham](#) > [all services](#) > [labor & moving](#)

[\[account\]](#)

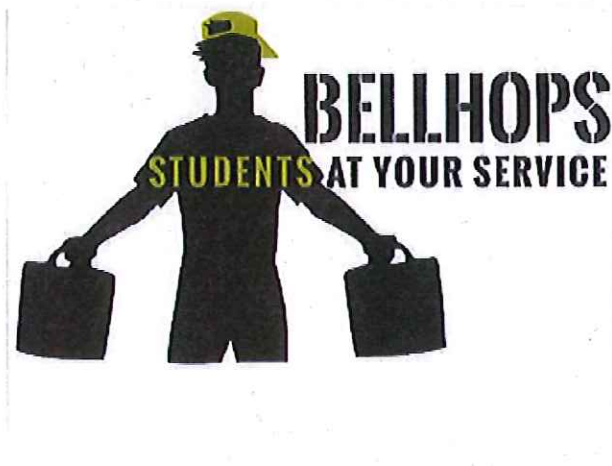
[reply](#)

[prohibited](#)

Posted: 13 days ago

[← prev](#) [▲ next →](#)

Get Bellhops! Student movers (Bellingham)



Let Bellhops make it easy!
We have students at Western Washington University ready to do the heavy lifting for you. We help with moving in and moving out of your home.

Use my code for 5% off your move:
stidhan1

Book Your Next Move Now!

www.getbellhops.com

• do NOT contact me with unsolicited services or offers

post id: 4598220972 posted: 13 days ago updated: 2 days ago [email to friend](#) [best of](#)

CL > [seattle](#) > [seattle](#) > [all services](#) > [labor & moving](#)

[\[account\]](#)

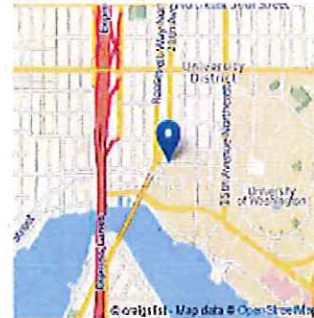
[reply](#)

[prohibited](#)

Posted: 8 days ago

[← prev](#) [next →](#)

Strong, awesome UW student movers!! (Seattle)



1101 ne campus parkway
[\(google map\)](#) [\(yahoo map\)](#)

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How to Book:

Book us easily ONLINE at www.GetBellhops.com or give us a call at [\(show contact info\)](#)

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post id 4606673182 posted 8 days ago updated 17 hours ago [email to friend](#) [▼ best of](#)

CL > seattle >

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labor & moving pic title [save / view searches](#)

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[newest](#)
[relevant](#)

Aug 19 - Great UW student movers!! - (Seattle) pic map

Aug 17 - Strong, awesome UW student movers! - (Seattle) pic map

Aug 16 - Great UW student movers!! - (Seattle) pic map

Few LOCAL results found. Here are some from NEARBY areas

Aug 12 - Get Bellhops! Student movers - (Bellingham) pic

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[account]

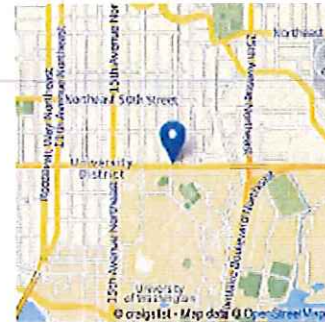
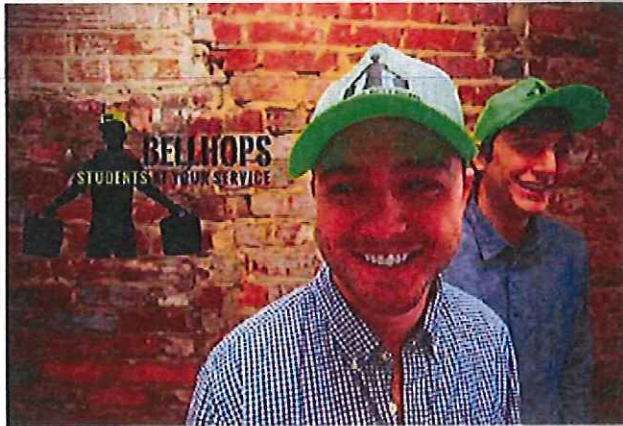
reply

X prohibited

Posted: 13 days ago

prev next

Great UW student movers!! (Seattle)



4508 19th ave ne (google map) (yahoo map)

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- 1.5 hr minimum

How to Book:

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- do NOT contact me with unsolicited services or offers

post id: 4608072449 posted: 13 days ago updated: 22 hours ago email to friend best of

Attachment G

Get the Daily Deal for:

GROUPON

Home | Local | Goods | Getaways | Clearance | Coupons | Night Out

\$40 for Two Movers for One Hour from Bellhops (\$80 Value)

\$40

BUY!

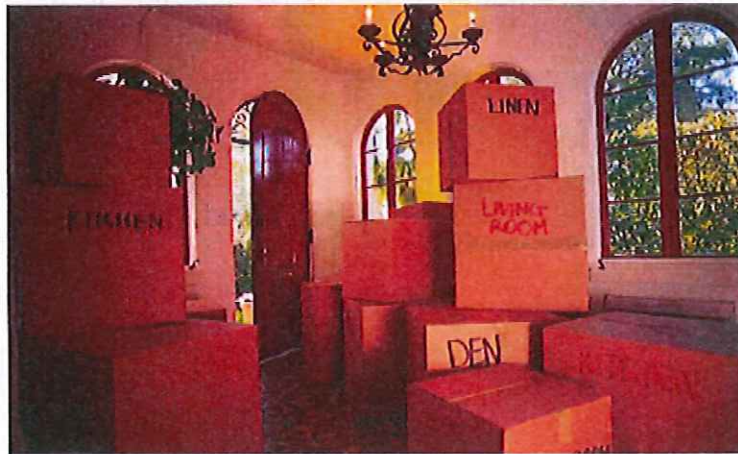
VALUE	DISCOUNT	YOU SAVE
\$80	50%	\$40

LIMITED TIME ONLY!

3 days 15:50:51

LIMITED QUANTITY AVAILABLE

3 bought



SHARE THIS DEAL

The frustrations of moving are many, from packing all your stuff into boxes to forgetting which boxes are safe to kick down the stairs. Get a hand with this Groupon.

The Deal

- \$40 for two Bellhops for one hour (\$80 value)

Students from local colleges, a.k.a. Bellhops, help you move into your new residence. The service is ideal for small-scale moving, such as apartments, condos, and 2-3 bedroom houses. The students are all recruited from reputable student organizations, such as ROTC, and they all undergo a pre-screening process. Before your move, Bellhops sends you an email with your two movers' pictures and profiles so you know who they are when they arrive.

Bellhops

Usually, when you hire a moving company, the best luxuries you can hope for are a big enough truck and protective furniture wrapping. Bellhops has expanded the list of perks considerably. Its movers—more than 8,000 pre-screened college students in more than

In a Nutshell

Pre-screened college student movers help you move your heavy belongings into your new residence.

The Fine Print

Expires 90 days after purchase. Limit 1 per person. Limit 1 per household per visit. Reservation required. Truck not included; extra \$135 fee if necessary. A minimum of 1.5 hours per job applies to booked moves; standard rate of \$80/hour applies for your pair of Bellhops per each additional hour booked after the initial hour. All services must be redeemed during a single visit by same household. Valid only within 15mi of 98225 and 98105. May not be combined with additional discounts or promotions. Merchant is solely responsible to

130 cities—work by the client's schedule instead of pigeonholing small-scale moves into appointment slots.

The student movers, who come from such reputable student organizations as ROTC and sports teams, sign up for their own jobs, too, so they're eager to help once they're onsite. They even send out profiles before moving day, introducing themselves to the client with pictures and information about their college studies and the maximum number of mini fridges they can bench press.

The founders of Bellhops started this business after reflecting on how many times they helped friends and their parents move heavy things in college, and the neighborly spirit of that arrangement still powers the student-driven organization.

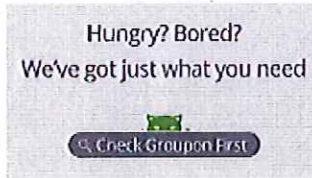
ASK A QUESTION

purchasers for the care and quality of the advertised goods and services.

[Company Website](#)

Reviews

- [3,110 Twitter Fans](#)
- [10,005 Facebook Fans](#)



In and Around Seattle

SEATTLE
Movers
Dry Cleaning
Taxes

BELLEVUE
Dry Cleaning
Child Care
Electrician

KIRKLAND
Dry Cleaning
Pest Control
Electrician

MERCER ISLAND
Dry Cleaning
Child Care
Electrician

NEWCASTLE
Dry Cleaning
Pest Control
Electrician

WHITE CENTER
Dry Cleaning
General Contractors
Electrician

Company

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