BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Determining the Proper Carrier Classification of, and Complaint for Penalties against:)	DOCKET TV-150166
SUSEYI, IBRAHIM D/B/A THE SUSEYI PRO MOVING SERVICE COMPANY)	DECLARATION OF MEGAN BANKS
· · · · · · · · · · · · · · · · · · ·)	*

Megan Banks, under penalty of perjury under the laws of the State of Washington, declares as follows:

- 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 The Suseyi Pro Moving Service Company in July 2014, after finding an advertisement on www.craigslist.org offering moving services. The advertisement included a telephone number, (206) 372-4619.¹
- 3. On July 25, 2014, I conducted a search of Washington Department of Revenue's Business Licensing Services for "The Suseyi Pro Moving Service Company."

 The search produces one record for Ibrahim Ahmed Suseyi d/b/a The Suseyi Pro Moving Service Company, governed by Ibrahim Ahmed Suseyi.²
- 4. I reviewed Commission records related to Ibrahim A. Suseyi d/b/a The Suseyi Pro Moving Service Company to determine whether the company held a household goods permit. According to Commission records, as of January 29, 2015, there is no record of Ibrahim A. Suseyi d/b/a The Suseyi Pro Moving Service Company now (or ever) holding a household goods permit.

¹ See Attachment A for an advertisement for Suseyi Pro Moving Service Company posted on www.craigslist.org, which I printed on July 17, 2014.

² See Attachment B for the business license associated with The Suseyi Pro Moving Service Company, which I printed on July 25, 2014.

- 5. On July 25, 2014, I texted (206) 372-4619 and requested an estimate for a move from Poulsbo to Bainbridge Island. I received a text message response from an unidentified person on July 25, 2014, stating that it would cost \$35 an hour per person, plus a flat rate of \$120 for a truck. The person also stated that the company could move me on July 30, 2014.
- 6. On October 1, 2014, commission staff sent a compliance letter to Ibrahim A. Suseyi d/b/a The Suseyi Pro Moving Service Company, at 7834 NE Lovgreen Rd., #B, Bainbridge Island, WA 98110-1200, (1) outlining the licensing process for household goods movers, directing Ibrahim A. Suseyi 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. Suseyi was required to respond or apply for a permit by October 15, 2014. Mr. Suseyi contacted me on October 6, 2014, and again on January 22, 2015, following his receipt of the compliance letter, to discuss commission rules.
- 7. On January 23, 2015, the commission received a permit application from Ibrahim A. Suseyi d/b/a The Suseyi Pro Moving Service Company. The application was not complete and commission staff sent a letter informing Mr. Suseyi of the missing elements on January 23, 2015. As of January 29, 2015, a complete permit application has not been received by the commission. A January 29, 2015, search on www.craigslist.org produced six advertisements.³
- 8. On January 14, 2015, I emailed The Suseyi Pro Moving Service Company through one of the company's www.craigslist.org advertisements and requested an estimate for a move from Seattle to Bainbridge. On January 14, 2015, a man who later identified himself as Ibrahim Suseyi, responded by email and stated that it would cost \$45 an hour per person and a \$150 flat rate for a truck.⁴
- 9. On January 28, 2015, I emailed The Suseyi Pro Moving Service Company through one of the company's www.craigslist.org advertisements requesting an estimate for a move from Kingston to Bainbridge. On January 28, 2015, a man who later identified himself as Ibrahim Suseyi responded by email and stated that it would cost \$45 an hour per person and a \$150 flat rate for a truck. He also offered to provide me an estimate for the whole move.⁵

DATED this 12th day of February, 2015, at Olympia, Washington.

MEGAN BANKS

³ See Attachment C for the list of www.craigslist.org advertisements, which I printed on January 29, 2015.

⁴ See Attachment D for the email exchange with Ibrahim Suseyi, which I printed on January 14, 2015.

⁵ See Attachment E for the email exchange with Ibrahim Suseyi, which I printed on January 28, 2015.

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

[account]

contact

|X| good-bited | Posted: 16 minutes ago

The Suseyi Pro Moving Service Company (Bainbridge island/Poulsbo)



9792 NE Murden Cove Dr (appale meg) (ration meg)

Let the Pro Suseyi take care of your next move. Reliable Efficient Always on time Reasonable Courtecus

Long distance available please give us a call. Licensed bonded and insured

\$35 sa four \$70 for 2 fours 2 man service You can get hold of me @205-372-4619

do NOT contact me with unsolicited services or offers

post it: 4973427335 posted: 18 minutes ago group to foor!

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- Forms
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License Information:

Entity Name: IBRAHIM AHMED SUSEYI

Business Name: THE SUSEYL PRO MOVING SERVICE COMPANY

License Type: Washington State Business

Entity Typa: Sole Proprietor
UBI: 602713291 Business ID:001 Location ID:0002

Status: To check the status of this business, go to Department of Revenue.

Location Address:

7834 NE LOVGREEN AD # 8 SAINBRIDGE ISLAND, V/A, 96110-1200

BAINGRIDGE ISLAND, WA. 98110-1250

Malling Address: 7834 NE LOVGREEN RD # B

First Issued Expires Status

Registered Trade Names: THE SUSE'S PRO POVING SERVICE COMPANY

03/10/2014

Governing People: |BRAHIM AHMED SUSEYI

Information Current as of 07/25/2014 6:39AM Pacific Time

New Soarch

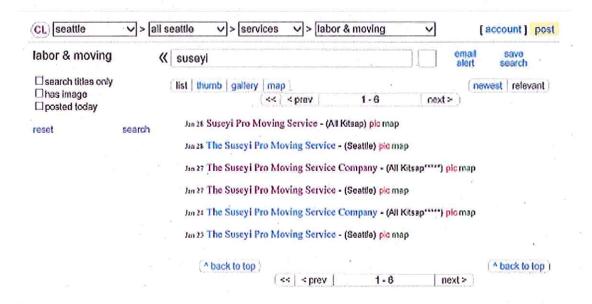
This site is limited to searching for business licenses issued through the Washington State Business Licensing Service.

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http://bls.dor.wa.gov/LicenseSearch/lqsLicenseDetail.aspx?RefID=296749

7/25/2014



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Subject: Re: move to Bainbridge

From:

craigslist 4840215112 (59rxx-4840215112@serv.craigslist.org)

To:

d03dc7bf3a2b3040bcbf456b6f1083e8@reply.cralgslist.org;

Date:

Wednesday, January 14, 2015 1:44 PM

Hi there,

\$150 flat goes to truck that's all day use including ferry's.

As far of my rates is \$45/hr per person.

Also as far of next weekend at the moment I'm open, but first come first serve .

If you have any other concern feel free to get hold of any time.

Thank you so much Ibrahim Susey 206-372-4619

On Wed, Jan 14, 2015 at 1:31 PM, Mag H

<d03dc7bf3a2b3040bcbf456b6f1083e8@reply.craigslist.org> wrote:

Hi, were moving from Seattle to Bainbridge and saw u on craigslist. Approximately how much would it cost to move from a 1 bed apt to a 2 bed apt? Does the costs include a truck? Are there any additional costs? Were just trying to get an idea of total costs for moving. And are u free next week or weekend? Thx! Maggie, magh56789@yahoo.com

Original craigslist post: .

http://seattle.craigslist.org/see/lbs/4840215112.html

About craigslist mail:

http://craigslist.org/about/help/email-relay

Please flag unwanted messages (spam, scam, other):

http://craigslist.org/mf/1aa0e714275b19c432634d7ab555f8184840403f.1

Original craigslist post:

http://seattle.craigslist.org/see/lbs/4840215112.html

About craigslist mail:

http://craigslist.org/about/help/email-relay

Please flag unwanted messages (spam, scam, other):

http://craigslist.org/mf/7154450a3f48363829ef46dfb3ef24c191840d5c.25

https://us-mg6.mail.yahoo.com/neo/launch?.rand=f4htjmc7pk3gb

1/14/2015

Subject: Re: How much to move from Kingston to Balnbridge?

From: craigslist 4865602747 (n44r4-4865602747@serv.craigslist.org)

To: 12667bc9ecea3f77bdcb354bbc938c97@reply.craigslist.org;

Date: Wednesday, January 28, 2015 9:24 AM

Hi Katie,

My rates are \$45/hr per person or I can give you an estimate for the whole move.

\$150 flat rate goes towards the truck and that's all.

We will take good care of your move.

If you have any more question's feel free to contact me any time.

Thank you so much Ibrahim Suseyi

206-372-4619

On Wed, Jan 28, 2015 at 9:02 AM, Katie S.

<12667bc9ecea3f77bdcb354bbc938c97@reply.craigslist.org> wrote:

Hi, Were moving from Kingston to Bainbridge... how much would it be? We're hoping to move next week, but are a bit flexible on date. We are moving from a 2 bedroom house to a 2 bedroom apartment. Is there any other information you need? Are there any other costs we should be aware of, like do we have to rent a truck or anything else? Thanks! Katie

Original craigslist post:

http://seattle.craigslist.org/kit/lbs/4865602747.html

About craigslist mail:

http://craigslist.org/about/help/email-relay

Please flag unwanted messages (spam, scam, other):

http://craigslist.org/mf/f5a986b4f861eda43eab47ad8ca76e2869b516f3.1

Original craigslist post:

http://seattle.craigslist.org/kit/lbs/4865602747.html

About craigslist mail:

http://craigslist.org/about/help/email-relay

Please flag unwanted messages (spam, scam, other):

http://craigslist.org/mf/b64ffa3531f055df8e3a4cc0a7df318c08844f18.10