BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Determining the Proper Carrier Classification of, and Complaint for Penalties against:

PAUL JAMES AKERMAN D/B/A MOVING MOVER: PAULTHEMOVER

DOCKET TV-220493

DECLARATION OF SHARMILA PRABAKARAN

- I, Sharmila Prabakaran, 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 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. On April 29, 2022, I found advertisements on Yelp for PaulTheMover (Company), which identified itself as a household goods moving company. The advertisement offered to provide household goods moving services in multiple areas of Washington State. The phone number provided in the advertisement was (253) 802-9790 and http://paulthemover.com was listed as the website.
 - 3. On April 29, 2022, I found advertisements on Craigslist for Moving Mover (Company), which identified itself as a household goods moving company. The advertisement offered to provide household goods moving services in multiple areas of Washington State.² The phone number provided in the advertisement was (253) 802-9790, the email address was paulthemover2021@gmail.com, and the website was http://paulthemover.com.
 - 4. On April 29, 2022, I searched Commission records for Moving Mover and PaulTheMover. The results did not produce any records of a permit authorizing the Company to perform household goods moving services.
 - 5. On May 5, 2022, I sent a compliance letter to Paul James Akerman indicating that the Company must cease and desist operations as a household goods carrier in Washington

¹ See Attachment A for a copy of the Yelp ad for PaulTheMover, captured on April 29, 2022.

²See Attachment B for a copy of the Craigslist ad for Moving Mover, captured on April 29, 2022.

State until the Company obtains the required household goods carrier permit from the Commission.³

- 6. On June 07, 2022, I called the number listed on the advertisements of PaulTheMover and Moving Mover as the phone number for both were the same. I spoke with a representative who identified themselves as Paul James Akerman. I informed Paul James Akerman that the Company is in violation of the Commission rules for performing household goods moves without a certificate, and that operating and advertising as a household goods carrier without a certificate is not permitted. Paul James Akerman agreed to cease all operations.
- 7. On June 28, 2022, using an assumed name I emailed paulthemover2021@gmail.com provided in the Craigslist advertisements for Moving Mover to obtain a quote for moving services. I asked if the Company could move a two bedroom with no stairs from Seattle to Tacoma. A representative of the Company emailed me back stating that they could perform the move for \$99 an hour with two guys, a truck, and all equipment necessary. The company representative stated I could call Paul with any questions at (253) 802-9790. This is the same phone listed on advertisements for both PaulTheMover and Moving Mover.⁴
- 8. On July 1, 2022, I searched the Commission records for PaulTheMover and results showed the Company applied for a household goods permit on July 01, 2022. On that same date, Commission staff issued a Notice of Deficient Application to Paul James Akerman, detailing items that needed to be completed and/or corrected for prompt processing their application for operating authority.
- 9. On August 1, 2022, I searched the Commission records again for the progress of the Company's application. The results showed that on August 1, 2023, a Notice of Intent to Deny Application for Permanent Authority and Notice of Opportunity for Hearing was sent to the Company.
- 10. On August 1, 2022, Paul James Akerman submitted a request to the Commission to voluntarily withdraw their application for permit.
- 11. On August 2, 2022, the Commission issued a Letter Granting Voluntary Dismissal of Household Goods Permit Application to Paul James Akerman d/b/a PaulTheMover.
- 12. On October 28, 2022, I found advertisements on Yelp for PaulTheMover, ⁵ which identified itself as a household goods moving company. The advertisement offered to provide household goods moving services in Washington State.

³ See Attachment C for a copy of the compliance letter and email, dated May 5, 2022.

⁴ See Attachment D for June 28, 2022, email quote from company.

⁵ See Attachment E for advertisements from Yelp, captured on Oct. 28, 2022.

13.	On March 9, 2023, I found advertisements on Craigslist for PaulThemover, ⁶ which
	identified itself as a household goods moving company. The advertisement offered to
	provide household goods moving services in Washington State.

14.	. On March 9, 2023, using an assumed name I texted (253) 802-9790 to obtain a quote for
	moving services including workers and a truck. This number was the contact number
	found in advertisements for Moving Mover and PaulTheMover, A representative of the
	company replied back stating they could perform the move for \$89 per hour for labor. ⁷

DATED this day May 10, 2023, at Lacey, Washington.

Sharmila Prabakaran

⁶ See Attachment F for advertisements from Craigslist, captured on March 9, 2023. ⁷ See Attachment G for March 9, 2023, text quote from the Company.