

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

SIMPORE, TIRAOGO,

Respondent.

DOCKET TV-230081

DECLARATION OF FRANCINE
GAGNE

I, Francine Gagne, under penalty of perjury under the laws of the state of Washington, declare as follows.

1. I am over 18 years of age and competent to testify to the facts contained herein.
2. I am employed by the Washington Utilities and Transportation Commission (Commission) as an investigator in the Motor Carrier Safety section. One of my responsibilities is to conduct safety investigations.
3. I initially contacted Tiraogo Simpire, the owner of Simpire, Tiraogo, dba TS Moving Services, on January 3, 2023, via email and informed him of his upcoming safety investigation. The email was sent to tsmovingservices@gmail.com and provided Simpire with a listing of documents required to be available at the time of the investigation. The document list was attached to the email in a document titled "Appointment Checklist Simpire". Documents requested included insurance documentation, driver qualification files, hours of service, and maintenance records.
4. On January 18, 2023, I met with Simpire for the purpose of conducting the safety investigation. Simpire admitted that the cargo insurance had expired but offered no documentation. Simpire had no other documents available for review and a review of company records was unable to be completed. Simpire indicated at that time that a calendar of moves existed, and I requested to see that document, but it was not presented to be reviewed.
5. On January 23, 2023, I requested via email to tsmovingservices@gmail.com if Simpire was able to locate/forward copies of driver files, contact information for cargo insurance, or the "work calendar".
6. On January 25, 2023, Simpire provided the insurance contact information requested in the January 23, 2023, email but failed to respond regarding the request for driver file information and a copy of the previously mentioned "work calendar". Further investigation into insurance coverage discovered that cargo insurance had expired on July 16, 2022.

7. I became aware of one trip conducted by Simpure made without cargo insurance coverage. Simpure listed the date of November 15, 2022, in the HHG Questionnaire attached to the original January 3, 2023, email. This date was used to validate identified violations.

DATED this 23rd day of February 2023, at Lacey, Washington.

/s/ Francine Gagne
FRANCINE GAGNE