



JOHN R. BONIN, ATTORNEY HENRY A. WARREN, ATTORNEY
PO Box 783 | Shelton, WA 98584 | 360-427-7474 | Fax 360-427-7475 | www.johnbonin.com

1/14/2021

Mark Johnson
Executive Director and Secretary
Utilities and Transportation Commission
621 Woodland Loop SE
PO Box 47259
Olympia, WA 98504-7250

Re: In RE: Miller, d/b/a Silver Limousine/Silver Transport Docket TE-180455

Mr. Johnson:

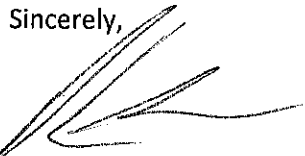
I am Chris Miller's prior legal counsel who has been retained again to try to help Mr. Miller rectify what seems to be a communication problem. Mr. Miller has been in active communication with the investigator on this matter as he was having difficulty downloading and submitting the requested form. The investigator worked with him on the telephone and he believed he had gotten the form in properly, but it appears from this letter that this is not the situation. Since getting this letter Mr. Miller has again talked to the investigator who has advised that Mr. Miller reach out to you. Mr. Miller did make that attempt, but in so doing it appears there are problems with the phone forwarding system or some other type of issue. Specifically, after following the instructions on how to speak to a live person at the UTC, the phone was ultimately connected to someone whose voice was so distant that nothing said could be understood. Mr. Miller could only hear the faint indications of a voice on the other line.

Mr. Miller has asked me to reach out to you to share the attached email I sent on his behalf to legal counsel for the state as well as the investigator and to further explain his situation here. Specifically, Mr. Miller has been trying to the best of his ability to get the required form in during this time of hardship and we respectfully ask that you reconsider your position and provide him the opportunity to work with the investigator and the state again to try to get this required relief form into your possession.

Mr. Miller is some distance from my office and this letter is based on telephone communication with him over the last two days. If this situation is one where it might be best to continue to work with counsel, I could certainly try to facilitate a resolution of someone were to send me the form required, at which time I would circulate it to my client and have my staff do whatever is necessary to procedurally get the document into your possession. As Mr. Miller has no income at this time, I would be taking this step on his behalf on future expectation of payment from him.

If you need this letter to be more formal in terms of what is being requested, I ask that you consider it a formal request for reconsideration of your decision and/or an appeal if reconsideration is not available. I am hopeful that this letter alone will be sufficient to either allow Mr. Miller to try to submit the form required again or to have my office do this on his behalf if he is simply unable to properly download the information.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Bonin', with a long horizontal stroke extending to the right.

John Bonin

Attorney at Law

Cc: Mr. Hoxit

Cc: Mr. Callahagan

Cc: client

Enc. Email to investigator and State Counsel attached

John Bonin

From: John Bonin
Sent: Wednesday, January 13, 2021 4:51 PM
To: Hoxit, Jason (UTC)
Cc: Callaghan, Nash (UTC)
Subject: CRM: 0003707; In Re: Chris Robert Miller UTC Docket TE-180455

Mr. Hoxit and Mr. Callaghan:

I forwarded your communications to Mr. Miller and Mr. Miller reports that he was in communication with Mr. Hoxit who assisted him in completion of the necessary forms a few weeks ago. He says he believed the forms were downloaded and sent in. He mentioned discussion with Mr. Hoxit during the process and said he was very helpful. He is surprised by this letter dated Jan. 11, 2021 as he thought he had done things correctly in the download process. His ability to earn an income has been completely shut down with COVID. I have not been representing this client since the settlement was reached, but he asked me to reach out to you all here because, even though he has been trying in good faith to get the form you wanted in, he seems to be doing something wrong and he hopes that we can work this out.

John Bonin
360-427-7474



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY 1-800-833-6384 or 711

January 11, 2021

RE: *In the Matter of Determining the Proper Carrier Classification of, and Complaint for Penalties Against, Chris Robert Miller, d/b/a Silver Limousine and Silver Transportation.*
Docket TE-180455

TO ALL PARTIES:

On November 7, 2019, the Washington Utilities and Transportation Commission (Commission) entered Order 01, Order Instituting Special Proceeding; Complaint Seeking to Impose Penalties; and Notice of Mandatory Appearance at Hearing (Order 01). Order 01 alleged that Chris Robert Miller, d/b/a Silver Limousine and Silver Transportation, (Silver Limousine or Company) had advertised and offered household goods moving services in the state of Washington without the necessary permit. Order 01 scheduled a hearing for December 10, 2019. The Commission subsequently rescheduled the hearing, at the request of the Company, for March 3, 2020.

On February 28, 2020, Commission staff (Staff) filed a letter explaining that the parties had reached a settlement in principle and requesting that the parties cancel the hearing. The same day, the Commission issued a notice canceling the hearing, and on April 23, 2020, Staff filed a settlement agreement on behalf of the parties.

On April 24, 2020, the Commission entered Order 02, Approving Settlement; Classifying Respondent as a Charter and Excursion Carrier; Imposing Penalties (Order 02). Order 02 imposed a penalty, and required the Company to file jointly with Staff a mutually agreeable payment arrangement. On May 29, 2020, Staff filed an agreed payment schedule.

On June 9, 2020, the Commission entered Order 03, Granting Payment Arrangement (Order 03). Order 03 approved a payment arrangement of 40 monthly installments of \$250 beginning on November 18, 2020. Order 03 stated that the delayed initial payment and extended schedule was intended to account for the economic instability resulting from the

COVID-19 pandemic, and allowed for Silver Limousine to file a request for extension of the payment arrangement prior to the due date of any payment if unable to meet the payments due to the ongoing effects of the pandemic.

On January 5, 2021, Commission staff (Staff) filed a letter in this docket informing the Commission that Silver Limousine had failed to make the first two payments and had not filed a request for extension. In its letter, Staff requests the Commission cancel the payment arrangement.

Due to Silver Limousine's failure to comply with the terms of Order 03, the Commission finds good cause to cancel the payment arrangement. The entire \$10,000 outstanding balance of the penalty is due and payable immediately.

MARK L. JOHNSON
Executive Director and Secretary