

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

SAFE-TO-GO-MOVERS, LLC,

Respondent.

DOCKET TV-200161

DECLARATION OF SANDRA
YEOMANS

I, SANDRA YEOMANS, 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) where I have worked as a special investigator in the Transportation division since August 19, 2015. My duties include conducting investigations of companies that may be operating in violation of the public service laws or Commission rules, including the rules governing the safe operation of household goods carriers.

2 On March 4, 2020, I completed a safety investigation of Safe To Go Movers LLC as a follow-up to an “unsatisfactory” rating resulting from a safety investigation dated June 13, 2019.

3 In the course of my review, I discovered one acute violation of 49 CFR § 390.35 for making or causing to be made a fraudulent or intentionally false entry on a record in John Wagura’s driver qualification file. The carrier signed off on an annual review prior to receiving a motor vehicle report. The motor vehicle report was dated April 5, 2019, and the report was signed February 14, 2019.

4 I discovered two critical violations of WAC 480-15-555 for hiring a person
convicted of a crime involving assault, theft, or burglary within the past five years. Driver
Jerome Jordan had convictions for third degree assault and robbery. Helper Maliki Cox had
convictions for third degree assault and fourth degree assault.

5 I discovered 27 acute-type violations of 49 CFR § 391.15(a) for using a disqualified
driver. Dartaniun Cox had a suspended license due to failure to comply but nevertheless
drove on the following dates in 2020: September 4, 5, 6, 8, 9, 11, 12, 14, 15, 19, 21, 22, 23,
25, 26, 27, 28, and 29 and October 5, 6, 7, 8, 9, 13, 14, 19, and 20. These are repeat
violations from the June 13, 2019 inspection.

6 I discovered one violation of 49 CFR § 391.23(c) for failing to investigate a driver's
background within 30 days of employment. The company did not acquire a motor vehicle
report for Tyler Bell within 30 days of being hired. This is a repeat violation from the June
13, 2019 inspection.

7 I discovered six critical-type violations of 49 CFR § 391.45(a) for using a driver not
medically examined and certified. The carrier did not require Tyler Bell to obtain a medical
certificate prior to driving a commercial motor vehicle on the following dates in 2020:
August 31 and September 11, 15, 23, 24, and 29. This is a repeat violation from the June 13,
2019 inspection.

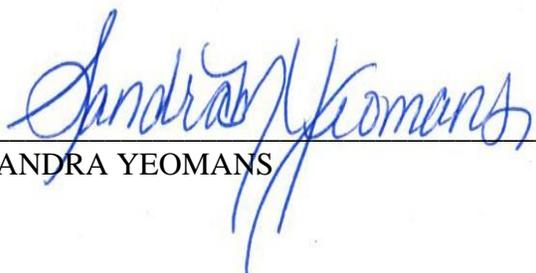
8 I discovered three violations of 49 CFR § 396.3(b)(1) for failing to keep a
maintenance record which identifies the vehicle, including make, serial number, year, and
tire size. The carrier did not have tire size marked on maintenance record.

9 I discovered two violations of Title 49 CFR § 396.11(c)(1) for failing to certify that
repairs were made or were not necessary. The carrier did not mark the driver vehicle
inspection report with either not necessary or corrected.

10 I discovered one violation of 49 CFR § 396.21(b) for failing to retain periodic inspection report for 14 months from date of inspection. This is a repeat violation from June 13, 2019 inspection.

11 Finally, I discovered one violation of 396.3(a)(1) for failing to maintain parts or accessories necessary to the safe operation of the vehicle in safe and proper operating condition. Specifically, I found a 20 percent failure on vehicle 1HTMMAAL85H681573's airbrakes and placed the vehicle out of service.

DATED this 23rd day of March, 2020, at Olympia, Washington



SANDRA YEOMANS