

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

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

IHOR KRUHLYI, D/B/A IK MOVING
SERVICES LLC

DOCKET TV-220535

DECLARATION OF
JACK GRAHAM

I, Jack Graham, 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. The commission received an email tip that IK Moving Service was operating as a household goods carrier without a commission issued permit.
3. On September 7, 2023, I searched Commission records for IK Moving Services. I found no business listed under that name.
4. On September 7, 2023, I found a company website, ikmovers.com, that advertised moving services which had a phone number of 509-768-9164.¹ When I selected “Get a Quote” a new email popped up with the email address of igor.kruglyi2015@gmail.com.²
5. On September 7, 2023, I found an advertisement on Yelp.com for IK Moving Services which identified itself as a household goods moving company. The advertisement offered to provide household goods moving services in the Spokane area of Washington State. It provided the phone number, 509-768-9164.³
6. On September 7, 2023, I searched the Department of Revenue Business Lookup and found a Limited Liability Company with a business name of IK Moving Services LLC, UBI 604-995-270 with an address of 14516 E 10th Ave Spokane Valley WA 99037, and Ihor Kruhlyi listed as Governing People.⁴

¹ See Attachment A: Company website IKMoving.com.

² See Attachment B: Email generated by IKMoving.com.

³ See Attachment C: Yelp.com advertisement.

⁴ See Attachment D: Department of Revenue Business Lookup.

7. On September 8, 2023, I sent a compliance letter to Ihor Kruhlyi that IK Moving Services LLC must cease and desist operations as a household goods carrier in Washington state until the company obtains the required household goods carrier permit from the Commission.⁵
8. On September 27, 2023, I searched Commission records for IK Moving Services. The results produced that on September 25 a company named IK Moving Services LLC had submitted a permit application for *Common Carrier of Property Excluding household Goods*. The contact name listed was Ihor Kruhlyi and the email address was igor.kruglyi2015@gmail.com. IK Moving Services LLC was granted a common carrier permit, but still does not have a permit to perform household goods moving services. The common carrier application provided a new mailing address for Ihor Kruhlyi: 12608 E 13th Ave Spokane Valley WA 99216.
9. On September 28, 2023, I sent a compliance letter to the address provided on IK Moving Services LLC's common carrier application that they must cease and desist operations as a household goods carrier in Washington state until the company obtains the required household goods carrier permit from the Commission.⁶
10. On October 20, 2023, I searched Yelp.com to see if IK Moving Services LLC continued to advertise. The results produced an advertisement for IK Moving. This advertisement displayed the same pictures and information as the advertisement on September 7, 2023.⁷
11. On October 20, 2023, I searched IKMovers.com to see if IK Moving Services LLC continued to advertise. The results produced an advertisement for IK Moving. This advertisement displayed the same pictures as the advertisement on September 7, 2023.⁸
12. On October 23, 2023, I sent an email to igor.kruglyi2015@gmail.com, using an assumed name to obtain a quote for moving services within the Spokane area. A representative of the company emailed a response on the same day, indicating their fee was \$150/hour with a minimum charge for 2 hours for a truck and two movers. The email was signed: Igor Kruhlyi Owner.⁹

DATED this day November 15, 2023, at Lacey, Washington.

Jack Graham

⁵ See Attachment E: Compliance letter dated September 7, 2023.

⁶ See Attachment F: Compliance letter dated September 28, 2023.

⁷ See Attachment G: Yelp.com captured.

⁸ See Attachment H: Company website IKMoving.com.

⁹ See Attachment I: Email quote from IK Moving Services.