## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

SARA YBARRA AND SHANE PABLO D/B/A ULTIMATE MOVERS, PRECISION MOVERS, QUALITY MOVERS DOCKET TV-230193

DECLARATION OF JAQUANDRIA EWANIKA

I, Jaquandria Ewanika, 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 March 6, 2023, I found advertisements on Craigslist for Precision Movers, 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 contact phone number included on the advertisement was (509) 350-7003.<sup>1</sup>
- 3. On March 6, 2023, I searched the phone number (509) 350-7003, which was listed on the Craigslist advertisement for Precision Movers, using the TLOxp system, and the comprehensive report showed the phone number was associated with Sara Ybarra
- 4. On March 6, 2023, I searched Commission records for Sara Ybarra. The results produced three previous investigations involving Sara Ybarra and Shane Pablo. I discovered that a cease and desist letter was sent to Sara Ybarra d/b/a Ultimate Moving and Hauling and Precision Movers on September 21, 2015. A cease and desist letter was sent to Sara Ybarra d/b/a Ultimate Movers on March 9, 2020. A third cease and desist letter was sent to Sara Ybarra and Shane Pablo d/b/a Quality Movers on June 16, 2021. All three cease and desist letters stated that Sara Ybarra and/or Shane Pablo must cease and desist performing moves and advertising to perform moves within the state of Washington without first receiving a permit from the Commission.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> See Attachment A for a copy of the Craigslist ad for Precision Movers, captured on March 6, 2023.

<sup>&</sup>lt;sup>2</sup> See Attachment B for a copy of compliance letters sent to Sara Ybarra and Shane Pablo, sent on September 21, 2015, March 9, 2020, and June 16, 2021.

- 5. On March 6, 2023, I searched Commission records for Ultimate Movers, Precision Movers, and Quality Movers and verified that these companies were not permitted household goods carriers.
- 6. On March 6, 2023, I searched Google and found a webpage for Quality Movers, https://qualitymovers-movingandstorageservice.business.site, which identified itself as a household goods moving company. The webpage offered to provide household goods moves in Washington State and listed (509) 818-8909 as the contact phone number.<sup>3</sup>
- 7. On March 6, 2023, I discovered that the telephone number, (509) 818-8909, which was listed on the Quality Movers webpage, was also associated with Sara Ybarra on the comprehensive report from TLOxp.
- 8. On March 6, 2023, I used the "get quote" option on the Quality Movers webpage and received an email that same day from the email address <u>smoknsara@gmail.com</u> stating they could perform a move for \$90 an hour with a three-hour minimum, with two movers, and a 17' truck. The email stated to call (509) 879-2512 to schedule a move. The email address and phone number matched an email address and phone number associated with Sara Ybarra on the comprehensive report from TLOxp.<sup>4</sup>
- 9. On March 9, 2023, I searched Google for (509) 879-2512, the phone number given in the email I received, and the results produced an advertisement on Yelp for Ultimate Movers, that listed Shane P. as the owner.<sup>5</sup>
- 10. On March 9, 2023, I searched Google for Quality Movers, and the results produced an advertisement on Yelp for Quality Movers, that listed the owner as Shane P.<sup>6</sup>
- 11. On March 20, 2023, I searched the Washington Department of Revenue's database for Quality Movers. The governing person for Quality Movers was listed as Sara Ybarra with a registered trade name of Ultimate Movers.<sup>7</sup>
- 12. On March 20, 2023, I responded to the March 6 email quote I received from Ultimate Movers and stated that I was moving from a one-bedroom home in Spokane to another home in Spokane. That same day, I received a response asking what day and time I would like to move. I responded that I would like to move on March 28, 2023, at 8:00 a.m. They stated they could perform this move. In the email, the person identified themselves as Sara.<sup>8</sup>

<sup>&</sup>lt;sup>3</sup> See Attachment C for a copy of Quality Mover's webpage, captured on March 20, 2023.

<sup>&</sup>lt;sup>4</sup> See Attachment D for a copy of the email quote from <u>smoknsara@gmail.com</u>, received on March 6, 2023.

<sup>&</sup>lt;sup>5</sup> See Attachment E for a copy of the Yelp page for Ultimate Movers, captured on March 9, 2023.

<sup>&</sup>lt;sup>6</sup> See Attachment F for a copy of the Yelp page for Quality Movers, captured on March 9, 2023.

<sup>&</sup>lt;sup>7</sup> See Attachment G for a copy of the Washington Department of Revenue's database for Quality Movers, captured on March 20, 2023.

<sup>&</sup>lt;sup>8</sup> See Attachment H for a copy of the email correspondence between Staff and Ultimate Movers, captured on March 20, 2023.

- 13. On March 20, 2023, I sent another email to Sara and asked her to clarify who the owner of the company was, because the Yelp page for Ultimate Movers listed Shane P. as the owner. Sara responded and stated they both owned the company and were husband and wife.<sup>9</sup>
- 14. On March 27, 2023, I searched TLOxp for Shane Pablo and the results showed that the phone number (509) 879-2512, which was listed on the Yelp page for Ultimate Movers, was associated with Shane Pablo.

DATED this day April 11, 2023, at Lacey, Washington.

<u>/s/ Jaquandria Ewanika</u>\_\_\_\_\_ Jaquandria Ewanika

<sup>&</sup>lt;sup>9</sup> See Attachment I for a copy of the email from Sara confirming Shane P. is a co-owner of Ultimate Movers, captured on March 20, 2023.