## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

VADIM IVANKOV D/B/A ITX LLC; MILE HIGH VAN LINES DOCKET TV-230493

DECLARATION OF JAQUANDRIA EWANIKA

I, Jaquandria Ewanika, under penalty of perjury under the laws of the State of Washington, declares as follows:

- 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. Staff received a tip that Mile High Van Lines was advertising to perform moves in Washington State and may be operating as a household goods mover without a UTC permit.
- 2. On February 6, 2023, I searched Commission records to determine if Mile High Van Lines has a household goods carrier permit and found no results.
- 3. On February 6, 2023, I searched the internet for Mile High Van Lines and found a Yelp advertisement for Mile High Van Lines which identified itself as a household goods moving company. The advertisement included the following contact information: 3882 Niagara St. Denver, Colorado 80207; (800) 929-9785; and <u>www.milehighvanlines.com</u>. It was not clear from the Yelp advertisement if Mile High Van Lines offered to perform moves within Washington State; therefore, I searched the website noted on the Yelp advertisement. The website offered to conduct household goods moves in Seattle, Washington and included the following information: 3882 Niagara St. Denver, Colorado 80207; (800) 929-9785<sup>1</sup>.
- 4. On February 6, 2023, I searched the United States Department of Transportation's database for Mile High Van Lines and found a company named ITX LLC d/b/a Mile High Van Lines. The address listed is 3882 Niagara St. Denver, Colorado 80207, which is the same address used on Mile High Van Lines' website.<sup>2</sup>
- 5. On February 6, 2023, I searched the internet for ITX LLC and found the website <u>www.itx-moving.com</u>. The website offered to conduct residential moves in Seattle Washington and included the following information: 3882 Niagara St. Denver, Colorado 80207; (888) 494-

<sup>&</sup>lt;sup>1</sup> See Attachment A for a copy of the Mile High Van Lines website, captured on February 6, 2023.

<sup>&</sup>lt;sup>2</sup> See Attachment B for a copy of the USDOT database results for Mile High Van Lines, captured on February 6, 2023.

1297. The address is the same one listed in the United States Department of Transportation's database for ITX LLC d/b/a Mile High Van Lines and the Mile High Van Lines' website. The database did not include an owner's name.<sup>3</sup>

- 6. On February 6, 2023, I searched for ITX LLC in the Colorado Secretary of State database and the results produced a company called ITX LLC with an address of 3882 Niagara St. Denver, Colorado 80207 which is the address listed on the ITX LLC and Mile High Van Lines websites. The registered agent's name was listed as Vadim Ivankov.<sup>4</sup>
- 7. On February 9, 2023, Staff sent Vadim Ivankov d/b/a ITX LLC and Mile High Van Lines a cease-and-desist letter that stated ITX LLC d/b/a Mile High Van Lines 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>5</sup>
- 8. On February 25, 2023, ITX LLC responded to the cease-and-desist letter via email and stated, "We are the [sic] moving company which do not performing [sic] any commercial activity in the state of Washington, [sic] We have an interstate authority which permit [sic] us to complete the moving process and make deliveries in the state of Washington , our advertising means that we have the ability to transport customers belongings at their new place of stay, which is Washington State."<sup>6</sup>
- 9. On February 27, 2023, I responded to ITX LLC's email and explained that the websites for ITX LLC and Mile High Van Lines offered to perform moves in Seattle, Washington and they must cease and desist advertising and offering to conduct moves within the state of Washington without the required permit from the Commission.<sup>7</sup>
- 10. On February 27, 2023, ITX LLC responded via email and stated they removed all content regarding Washington State operations from the <u>www.itx-moving.com</u> website. I reviewed the website for ITX LLC and verified content regarding moving services in Washington State was removed.<sup>8</sup>
- 11. On March 3, 2023, I responded to ITX LLC's email and informed them that the Mile High Van Lines website still offered to perform moves in Washington State. I received no response regarding removing this language from their website.<sup>9</sup>
- 12. On May 24, 2023, Compliance Investigator, Sharmila Prabakaran, called the telephone number (800) 929-9785 listed on the Mile High Van Lines' website under an assumed name and spoke to a person who identified themselves as Tom, a Company representative. Sharmila received a quote for a move from a one-bedroom apartment in Seattle, WA to another home in Seattle, WA for the second week of June 2023, with labor and a truck for

<sup>&</sup>lt;sup>3</sup> See Attachment C for a copy of the ITX LLC website, captured on February 6, 2023.

<sup>&</sup>lt;sup>4</sup> See Attachment D for a copy of the Colorado Secretary of State database screenshot for ITX LLC, captured on February 6, 2023.

<sup>&</sup>lt;sup>5</sup> See Attachment E for a copy of the cease-and-desist letter sent to the Company, sent on February 9, 2023.

<sup>&</sup>lt;sup>6</sup> See Attachment F for a copy of the Company's response email, received on February 25, 2023.

<sup>&</sup>lt;sup>7</sup> See Attachment G for a copy of Staff's response to the Company, sent on February 27, 2023.

<sup>&</sup>lt;sup>8</sup> See Attachment H for a copy of the Company's response email, received on February 27, 2023.

<sup>&</sup>lt;sup>9</sup> See Attachment I for a copy of Staff's response to the Company, sent on March 3, 2023.

around \$2,500 or maybe a minimum of \$2,000 with padding, wraps, and disabling boxes. He stated his email address was tommoving9@gmail.com.

DATED this day June 21, 2023, at Lacey, Washington.

<u>/s/Jaquandria Ewanika</u> Jaquandria Ewanika Consumer Protection, Compliance Investigator