

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

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In the Matter of STAFF INVESTIGATION)	DECLARATION OF M. CARLENE
of the Books, Records, and Documents of)	HUGHES IN SUPPORT OF
)	REQUEST FOR SUBPOENA
Boots, Inc., d/b/a Brooks A & A Moving)	DUCES TECUM
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I, M. CARLENE HUGHES, under penalty of perjury under the laws of the state of Washington, declare as follows:

1 I am over 18 years of age, a citizen of the United States, a resident of the state of Washington, and competent to be a witness.

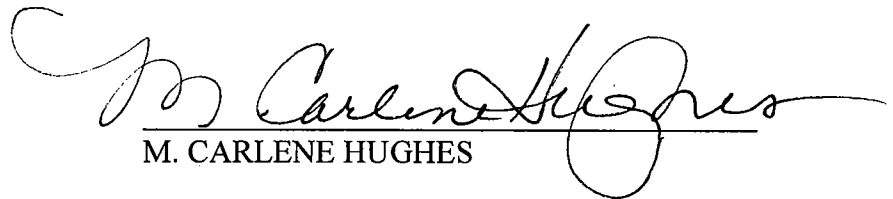
2 I am employed by the Washington Utilities and Transportation Commission (Commission) as a Transportation Program Coordinator in the Business Practices Investigations Section. I have been employed at the Commission for 21 years, holding various positions. As a Transportation Program Coordinator, my responsibilities include conducting investigations regarding the business practices of regulated utilities or transportation companies. As part of those duties, I investigate regulated household goods carriers that may be operating in violation of Commission statute, rule, or tariff.

3 Business Practices Investigations staff began an audit of Boots, Inc. d/b/a Brooks A & A Moving (Brooks) in April 2005 after a complaint filed against Brooks in December 2004 indicated the company was not completing the bill of lading in accordance with WAC 480-15 and was charging customers rates and charges not allowed by the household goods tariff. As part of the audit, I examined bills of lading from intrastate residential moves that took place in January through April 2005 and in June of 2005. My investigation revealed that Brooks regularly charged sales tax on moving services, which is not an authorized charge in the household goods tariff.

4 Commission Staff subsequently determined that it was necessary to investigate how long Brooks had been charging sales tax on moving services, how many customers had been

overcharged, the amount of the overcharges, and when the company ended this practice, assuming it did. On May 18, 2006, I spoke on the telephone with Richard Brooks of Brooks Moving. I told him that I needed additional bills of lading for the audit. When he objected that he did not have the staff to find or copy them, I explained that Commission Staff just needed to have the records available at his place of business and that we would come and copy them at no expense to him. When I asked him again if we could arrange to inspect and copy his records he said no. I asked him if he was refusing to provide the Commission with the bills of lading, and he said yes and hung up.

DATED at Olympia, Washington, and effective this 23rd day of May, 2006.


M. CARLENE HUGHES