



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

Utilities and Transportation Division
PO Box 40128 • Olympia WA 98504-0128 • (360) 664-1183

Sent via electronic filing and service

July 16, 2021

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
P.O. Box 47250
Olympia, Washington 98504-7250

RE: *In re the Matter of Determining the Proper Carrier Classification of, and Complaint for Penalties Against: Kim Jones d/b/a Desert Wave*
Docket TE-190052

Dear Mr. Johnson:

On July 14, 2021, Kim Jones d/b/a Desert Wave (“Company”), submitted documents purporting to show that, on July 12, 2021, the Washington State Patrol performed a “Uniform Limousine Vehicle Inspection for the 2005 Hummer, license number B15674L, and the Lincoln Town Car license number B53185K.” However, the Company attached duplicate inspection documents for its Lincoln Town Car (License No. B53185K) and did not, in fact, attach an inspection record for the Company’s 20-passenger 2005 Hummer H2 (License No. B15674L). The Company’s Hummer H2 is the vehicle that is the subject of Commission staff’s (“Staff”) June 1, 2021, Motion to Impose Suspended Penalties in this docket. The Company has yet to produce documentation showing it has registered its Hummer H2 as a limousine with the Washington Department of Licensing (“DOL”).

Regardless, the Company obtaining a limousine vehicle certificate for the Hummer H2 at this late juncture would not alter the fact that the Company violated Order 02 in this docket on May 13, 2021, when it offered charter party or excursion carrier service in its Hummer H2 vehicle to a Staff investigator without operating authority from the Commission, nor a valid limousine carrier license through DOL. Recent licensure, even if shown, could only potentially support mitigation, but Staff does not recommend further mitigation at this time.

//
//
//

Received
Records Management
07/16/21 10:15
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

ATTORNEY GENERAL OF WASHINGTON

M. Johnson
July 16, 2021
Page 2

Sincerely,

/s/ Daniel J. Teimouri, WSBA No. 47965
Assistant Attorney General
Office of the Attorney General
Utilities and Transportation Division
P.O. Box 40128
Olympia, WA 98504-0128
(360) 664-1189
daniel.teimouri@utc.wa.gov

DJT:es
cc: Parties (electronic only)