



1500 SW Arrowhead Road
Topeka, KS 66604-4027

Phone: 785-271-3100
Fax: 785-271-3354
<http://kcc.ks.gov/>

Dwight D. Keen, Chair
Shari Feist Albrecht, Commissioner
Jay Scott Emler, Commissioner

Laura Kelly, Governor

NOTICE OF PENALTY ASSESSMENT

May 2, 2019

19-TRAM-429-PEN

Charles Mulengo, Manager
Savannah Traders LLC
12904 W 108th Street
Overland Park, KS 66210

This is a notice of a penalty assessment against Savannah Traders LLC (Savannah Traders) for violation(s) of Kansas Motor Carrier Safety Statutes, Rules, and Regulations discovered during a compliance review conducted on April 16, 2019, by Kansas Corporation Commission Special Investigator Wade Patterson. Penalties are assessed in accordance with the FY 2019 Uniform Penalty Assessment Matrix, approved by the Commission on August 7, 2018. For a full description of the penalty(s) and terms and obligations please refer to the Order attached to this notice.

IF YOU ACCEPT THE PENALTY: Savannah Traders has been assessed a \$3,350 penalty. You have thirty (30) days from the date of service of the Penalty Order to pay the penalty. Please remit payment of \$3,350, through your personal account with the Kansas Corporation Commission's KTRAN system located at <https://puc.kcc.ks.gov/ktran/>. If you have not received a letter from the Transportation Division assigning you a PIN, please contact that Division at 785-271-3145. You must have an account through KTRAN to pay the penalty owed.

The attached Order requires a representative of Savannah Traders to attend a Commission-sponsored safety seminar within ninety (90) days from the date of the Order and to provide the undersigned Litigation Counsel with written proof of attendance. A schedule of dates and locations for safety seminars can be found at the Commission's website http://www.kcc.state.ks.us/trans/safety_meetings.htm. The Order also requires your company to submit to one follow-up safety compliance review within 18 months from the date of the Order. Transportation Staff will contact your company at a later date to determine an appropriate time for this review.

IF YOU CONTEST THE PENALTY ORDER: You have the right to request a hearing. A request for hearing must be made in writing, setting forth the specific grounds upon which relief is sought. Savannah Traders must file, within fifteen (15) days from the date of service of this Order, the request for hearing with the Commission's electronic filing system found at <https://puc.kcc.ks.gov/e-filing/e-express/>, and mail a copy of the request for hearing to the undersigned at the above address. If you do not have access to the internet, you can mail an original and seven copies of the request to the Secretary to the Commission at 1500 S.W. Arrowhead Road, Topeka, Kansas 66604, and mail a copy to the undersigned Litigation Counsel. K.A.R. 82-1-215; K.S.A. 2018 Supp. 77-542.

IF YOU FAIL TO ACT: Failure to pay the penalty of \$3,350 within thirty (30) days from the date of service of the Penalty Order or failure to comply with the terms of the Order, or in the alternative, failure to provide a timely written request for a hearing, will result in the Order becoming final and may result in additional sanctions of suspension and/or revocation of your motor carrier operating authority.

Respectfully,


Ahsan A. Latif
Litigation Counsel
(785) 271-3118

**THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Before Commissioners: Dwight D. Keen, Chair
 Shari Feist Albrecht
 Jay Scott Emler

In the Matter of the Investigation of **Savannah**)
Traders LLC, of Overland Park, KS,)
Regarding the Violation of the Motor Carrier)
Safety Statutes, Rules and Regulations and the) Docket No. 19-TRAM-429-PEN
Commission's Authority to Impose Penalties,)
Sanctions and/or the Revocation of Motor)
Carrier Authority.)

PENALTY ORDER

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (Commission). Having examined its files and records, and being duly advised in the premises, the Commission finds and concludes as follows:

I. JURISDICTION

1. Pursuant to K.A.R. 82-4-1b, 66-1,111, 66-1,112, 66-1,114, 66-1,114b and 66-1,115, the Commission is given full power, authority and jurisdiction to supervise and control motor carriers, as defined in K.A.R. 82-4-1, doing business or procuring business in Kansas, and is empowered to do all things necessary and convenient for the exercise of such power, authority and jurisdiction.

2. Pursuant to K.S.A. 2018 Supp. 66-1,129a, 66-1,130 and 66-1,142b, the Commission may suspend operations, revoke or amend certificates, and initiate sanctions or fines against every motor carrier and every person who violates any provision of Kansas law in regard

to the regulation of such motor carriers and persons, or who fails to obey any order, decision or regulation of the Commission.

3. The Commission has the authority, pursuant to K.A.R. 82-1-237, to investigate an entity under the Commission's jurisdiction and issue an order on the Commission's own motion when the Commission believes the entity is in violation of the law or any order of the Commission.

II. BACKGROUND

4. Savannah Traders LLC (Savannah Traders) has common operating authority with the Commission and further operates under USDOT number 2551471.

5. Charles Mulengo attended a Commission-sponsored Motor Carrier Education and Safety Instructional Meeting on December 20, 2016, on behalf of Savannah Traders.

6. Savannah Traders is a common motor carrier which primarily hauls general freight.

III. STATEMENT OF FACTS

7. Pursuant to the jurisdiction and authority cited above, on April 16, 2019, Commission Staff (Staff) Special Investigator Wade Patterson conducted a safety compliance review of the operations of Savannah Traders. A copy of the safety compliance review is included in this Penalty Order as Attachment "A" and is hereby incorporated by reference. As a result of this investigation, the special investigator identified two (2) violation(s) of the Motor Carrier Safety Regulations.

- a. On January 30, 2019, Savannah Traders required or permitted its driver, Michael Ledford, to operate a CDL-required commercial motor vehicle, a 2006 Peterbilt, VIN ending in 884005, GVWR 50,000 lbs., pulling a 2005

Wanc trailer, VIN ending in 905507, GVWR 68,000 lbs., in interstate commerce from Odessa, Missouri to Kansas City, Kansas. This trip is evidenced by Driver's Daily Log, dated January 30, 2019, a copy of which is attached hereto as Attachment "B" and is hereby incorporated by reference. At the time of this transportation, Savannah Traders did not have a means of indicating the nature and due date of the various inspections and maintenance operations to be performed on the commercial motor vehicles. The carrier did not have established a preventative maintenance program for its vehicles. Savannah Traders' failure to have records indicating the nature and due date of the inspections and maintenance operations to be performed on the commercial motor vehicles is a violation of 49 C.F.R. 396.3(b)(2), adopted by K.A.R. 82-4-3a, and authorized by K.S.A. 2018 Supp. 66-1,129. Staff recommends a fine of \$350.

- b. During the transportation described in paragraph a, above, Savannah Traders required or permitted the operations of the commercial motor vehicles when they were both placed out-of-service during a roadside inspection dated January 28, 2019. The critical violations found during the inspection were not corrected as directed. *See*, Driver/Vehicle Examination Report Number MOW142001858, dated January 28, 2019, a copy of which is attached hereto as Attachment "C" and is hereby incorporated by reference. The carrier's operations of a commercial motor vehicle(s) that has been declared and marked as "out-of-service" without it

being repaired, is a violation of 49 C.F.R. 396.9(c)(2), adopted by K.A.R.

82-4-3a, and authorized by K.S.A. 2018 Supp. 66-1,129. Staff

recommends a fine of \$3,000.

IV. STAFF'S RECOMMENDATIONS

8. Based upon the available facts, Staff recommends the Commission finds Savannah Traders committed two (2) violation(s) of Kansas law that governs motor carriers, including various provisions of the Federal Motor Carrier Safety Regulations (FMCSRs), as adopted by the Kansas Administrative Regulations, and is therefore subject to sanctions or fines imposed by the Commission.

9. Additionally, Staff recommends a civil penalty of \$3,350 for two (2) violation(s) of the Motor Carrier Safety Statutes, Rules and Regulations.

10. Staff further recommends that a representative from Savannah Traders be required to attend a Commission-sponsored safety seminar within ninety (90) days from the date of this Order, and provide Litigation Counsel with written proof of attendance. A schedule of the dates and locations for safety seminars can be found on the Commission's website at http://kcc.ks.gov/trans/safety_meetings.htm.

11. Finally, Staff recommends that Savannah Traders submit to one follow-up safety compliance review within eighteen (18) months from the date of this Order. Transportation Staff will contact the motor carrier at a later date to determine an appropriate time for this review.

V. CONCLUSIONS OF LAW

12. The Commission finds it has jurisdiction over Savannah Traders because it is a motor carrier as defined in K.A.R. 82-4-1.

13. The Commission finds Savannah Traders committed two (2) violation(s) of Kansas law that governs motor carriers, including various provisions of the Federal Motor Carrier Safety Regulations (FMCSRs), as adopted by the Kansas Administrative Regulations, and is therefore subject to sanctions or fines imposed by the Commission.

THE COMMISSION THEREFORE ORDERS THAT:

A. Savannah Traders LLC, of Overland Park, KS is hereby assessed a \$3,350 civil penalty for two (2) violation(s) of Kansas law governing the regulation of motor carriers, the Kansas Administrative Regulations and provisions of the Federal Motor Carrier Safety Regulations, as adopted by the Kansas Administrative Regulations.

B. Savannah Traders is hereby ordered to attend a Commission-sponsored safety seminar within ninety (90) days from the date of this Order, and is to provide Litigation Counsel with written proof of attendance.

C. Savannah Traders is ordered to submit to one follow-up safety compliance review within eighteen (18) months from the date of this Order. Transportation Staff will contact the carrier to set up the appointment.

D. Pursuant to K.S.A. 2018 Supp. 77-537 and K.S.A. 77-542, any party may request a hearing on the above issue(s) by submitting a written request setting forth the specific grounds upon which relief is sought. The request may be electronically filed with the Commission's electronic filing system at <https://puc.kcc.ks.gov/e-filing/e-express/>, within fifteen (15) days from the date of service of this Order, and a copy of the request mailed to the Litigation Division. If you do not have access to the internet, you can mail an original and seven copies of the request to the Secretary to the Commission, at 1500 S.W. Arrowhead Road, Topeka, Kansas 66604, and mail a copy of the request to Litigation Counsel. A hearing will be scheduled only upon written

request. Failure to timely request a hearing will result in a waiver of Savannah Traders' right to a hearing, and this Penalty Order will become a Final Order assessing a \$3,350 civil penalty against Savannah Traders, and ordering a representative from Savannah Traders to attend a Commission-sponsored safety seminar within ninety (90) days from the date of this Order and provide Litigation Counsel with written proof of attendance, and to submit to a safety compliance review within 18 months from the date of this Order.

E. If a request for hearing is filed, attorneys for all parties shall enter their appearances in Commission proceedings by giving their names and addresses for the record. For civil penalties exceeding \$500, a corporation shall appear before the Commission by its attorney, unless waived by the Commission for good cause shown and a determination that such waiver is in the public interest. K.S.A. 77-515(c); K.A.R. 82-1-228(d)(2); K.A.R. 82-1-202(a). For civil penalties less than \$500, a corporation may appear by a duly authorized representative of the corporation. K.S.A. 2018 Supp. 66-1,142b(e) and amendments thereto.

F. If you do not request a hearing, the payment of the civil penalty of \$3,350 is due in thirty (30) days from the date of service of this Order. Payment of \$3,350 must be made through your personal account with the Kansas Corporation Commission's KTRAN system located at <https://puc.kcc.ks.gov/ktran/>. You must have an account through KTRAN to pay the penalty.

G. Failure to pay the \$3,350 civil penalty within thirty (30) days from the date of service of this Penalty Order, *see* K.S.A. 66-1,105, and/or failure to comply with the provisions of this Order, may result in suspension of Savannah Traders' motor carrier operating authority without further notice. Additionally, the Commission may impose further sanctions to include,

but not limited to, the issuance and enforcement of revocation of authority and/or cease and desist orders, and any other remedies available to the Commission by law, without further notice.

H. The Commission retains jurisdiction over the subject matter and the parties for the purpose of entering such further orders, as necessary.

BY THE COMMISSION IT IS SO ORDERED.

Keen, Chair; Albrecht, Commissioner; Emler, Commissioner






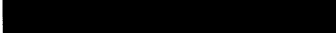
Dated: 05/02/2019



Lynn M. Retz
Secretary to the Commission

AAL

ATTACHMENT “A”

	US DOT # 2551471	Legal: SAVANNAH TRADERS LLC Operating (DBA):	
MC/MX #: 888950		Federal Tax ID:  (EIN)	
Review Type: Compliance Review (CR)			
Scope:	Principal Office	Location of Review/Audit: Company facility in the U. S.	Territory:
Operation Types		Business: Corporation	
Interstate	Intrastate	Gross Revenue:  for year ending: 12/31/2018	
Carrier: Non-HM	N/A		
Shipper: N/A	N/A		
Cargo Tank:	N/A		
Company Physical Address:			
12904 W 108TH STREET OVERLAND PARK, KS 66210-1108			
Contact Name: Charles Mulengo			
Phone numbers: (1) 		Fax: 	
E-Mail Address: 			
Company Mailing Address:			
12904 W 108TH STREET OVERLAND PARK, KS 66210-1108			
Carrier Classification			
Authorized for Hire			
Cargo Classification			
General Freight			
Equipment			
	Owned	Term Leased	Trip Leased
Truck Tractor	0	1	0
Trailer	2	0	0
Power units used in the U.S.: 1			
Percentage of time used in the U.S.: 100			
Does carrier transport placardable quantities of HM? No			
Is an HM Permit required? N/A			
Driver Information			
	Inter	Intra	Average trip leased drivers/month: 0
< 100 Miles:			Total Drivers: 1
>= 100 Miles:	1		CDL Drivers: 1



	SAVANNAH TRADERS LLC U.S DOT # 2551471	Review Date 04/16/2019
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Part A

QUESTIONS regarding this report or the Federal Motor Carrier Safety or
Hazardous Materials rules may be addressed to the Office of Motor Carriers at

This report will be used to assess your safety compliance.

Person(s) Interviewed


Name: Charles Mulengo

Title: Owner

Name:

Title:



	SAVANNAH TRADERS LLC U.S. DOT #, 2551471	Review Date 04/16/2019
Part B Violations		

change to a safety rating under section 385.17 may be made at any time. A motor carrier may request, in writing, a change in the rating by providing evidence of corrective actions to the Field Administrator for the FMCSA Service Center in which the carrier maintains its principal place of business (See 49 CFR 385.17 for additional details). A request for administrative review under section 385.15 must be made within 90 days of the date of the proposed safety rating issued under section 385.11(c) or a final safety rating issued under section 385.11(b), or within 90 days after denial of a request for a change in rating under section 385.17.

If this was a focused investigation, which will be noted in the Review Type on the first page of this report (Part A), some factors shown above may be marked "SATISFACTORY" even if they were not reviewed. A focused investigation will not result in a SATISFACTORY safety rating because all standards and factors specified in 40 CFR 383.5 and 385.7 were not examined in full, even though it may appear that they were under the rating factors in Part B of this document. It may, however, result in a less than SATISFACTORY rating if sufficient violations are discovered in the parts and factors examined to result in a CONDITIONAL or UNSATISFACTORY rating, or a non-ratable review.

If you receive a conditional or unsatisfactory rating, you may request an administrative review under 49 CFR 385.15 or a safety rating upgrade based on corrective action under 49 CFR 385.17. However, a successful request may only result in a non-ratable status, upgrade to a conditional safety rating, or reinstatement of your most recent safety rating. You will not receive a new satisfactory safety rating as a result of your request(s) under 49 CFR 385.15 and/or 49 CFR 385.17.





SAVANNAH TRADERS LLC
U.S. DOT # 2551471

Review Date
04/16/2019

Part B Requirements and/or Recommendations

1. For all Investigations

- Understand Why Compliance Saves Time and Money Compliance with FMCSRs will not only save lives, but also saves your business time and money. Tracking how much your business spends on non-compliance activities can help you understand the many benefits of compliance to your business and why safety is good business.
- Document and Follow Through on Action Plans. Document and follow through on action plans to ensure the actions you are taking are creating improvement in safety management and compliance.
- NOTICE A pattern and/or repeated violations of the same or related acute or critical regulations (violations of the same Part in Title 49, Code of Federal Regulations) will cause the maximum penalties allowed by law to be assessed under Section 222 of the Motor Carrier Safety Improvement Act of 1999 (MCSIA). A pattern of violations means two or more violations of acute and/or critical regulations in three or more Parts of Title 49, Code of Federal Regulations discovered during any eligible investigation. Repeated violations means violation(s) of an acute regulation of the same Part of Title 49, Code of Federal Regulations discovered in an investigation after one or more closed enforcement actions within a six year period and/or violation(s) of a critical regulation in the same Part of Title 49, Code of Federal Regulations discovered in an investigation after two or more closed enforcement actions within a six year period.
- NOTICE 49 CFR Part 391.23 requires prospective employers to, at a minimum, investigate a driver's employment information, crash record, and alcohol and controlled substances history from all employers the driver worked for within the previous 3 years.

The Pre-Employment Screening Program (PSP) is a screening tool that assists motor carriers in investigating crash history and roadside safety performance of prospective drivers. The PSP allows motor carriers to purchase 5 years of crash data and 3 years of roadside inspection data from the Federal Motor Carrier Safety Administration's (FMCSA) Motor Carrier Management Information System (MCMIS). Records are available 24 hours a day via Web request. Motor carriers should visit the following website for more information:
<http://www.psp.fmcsa.dot.gov/Pages/default.aspx>

- All motor carriers and truck drivers are needed to fight against terrorism and hijacking. You could be a target. Protect yourself, your trucks, your cargo, and your facilities. Discuss with your employees/drivers the "Security Measures for Truck Drivers and Companies" which were provided and reviewed with motor carrier official. Motor carriers should visit the following website for more information:
<http://www.fmcsa.dot.gov/documents/Hijacking-Brochure.pdf>

For all Investigations that could result in a Notice of Claim


- PLEASE NOTE The violations discovered during this compliance review may affect the civil penalty proposed in any subsequent Notice of Claim. In addition, your history of prior violations of the Federal Motor Carrier Safety Regulations, Federal Hazardous Material Regulations or the Federal Motor Carrier Commercial Regulations may also affect the civil penalty proposed in any subsequent Notice of Claim. Your signature for receipt of this report acknowledges your understanding that the violations discovered by the FMCSA during this review may be used to calculate any civil penalty proposed as a result of this review.

For all Investigations resulting in serious violations

Serious violations were recorded on this investigation report. These violations will impact your safety record. Furthermore, these violations may result in a follow-up investigation at a later date unless adequate evidence of corrective action is forwarded to our office

US Department of Transportation
Federal Motor Carrier Safety Administration
Kansas Division
Division Administrator



	SAVANNAH TRADERS LLC U.S. DOT #: 2551471	Review Date 04/16/2019
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Part B Requirements and/or Recommendations

1303 First American Place
Suite 200
Topeka, KS 66604-4040

For all Investigations resulting in a proposed conditional or unsatisfactory rating

385.15

If you believe the proposed rating is in error and there are factual and procedural issues in dispute, Part 385.15 (copy provided) outlines procedures for petitioning the Federal Motor Carrier Safety Administration for an administrative review of these findings. Your petition should be addressed to

Chief Safety Officer
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue SE,
Washington, DC 20590

385.17

In addition, a request for a revised rating based on corrective actions may be made at any time. Part 385.17 (copy provided) outlines the procedures for such a request. The request must be made in writing, must describe the corrective action taken and must include other documentation that may be relied upon as a basis for the requested change. Address your written request to

US Department of Transportation
Federal Motor Carrier Safety Administration
Midwestern Service Center
4749 Lincoln Mall Drive
Suite 300-A
Matteson, IL 60443

Ensure that a CC copy of the letter is mailed to

US Department of Transportation
Federal Motor Carrier Safety Administration
Kansas Division
Division Administrator
1303 First American Place
Suite 200
Topeka, KS 66604-4040

This letter should be submitted as soon as possible

For all Investigations that did not result in a Cooperative Safety Plan

The KCC requires that you prepare a corrective action letter, addressing the measures taken to correct the violations identified within this report. Submit this letter within 30 days outlining the carrier's updated changes to their policies and procedures regarding all listed violations. Explain in detail how, as a carrier representative, you will rectify these deficiencies and prevent their reoccurrence going forward. Include any supporting documentation and evidence as indicated in the recommendations above, (example: vehicle inspections performed, proof of drug and alcohol testing in place, etc.) necessary to prove that corrective action has been taken. Mail the letter along with copies of your supporting evidence to

Kansas Corporation Commission





SAVANNAH TRADERS LLC
U.S. DOT #. 2551471

Review Date
04/16/2019

Part B Requirements and/or Recommendations

Attn: Gary Davenport
1500 SW Arrowhead Rd
Topeka, KS 66604-4027

2. FMCSA recently announced planned improvements to the Carrier Safety Measurement System (SMS) which was implemented in December 2010 as part of the Agency's broader Compliance, Safety, Accountability (CSA) initiative. A preview of these improvements is currently available to motor carriers. The system changes are scheduled to be available to the public in July 2012. There will be additional opportunity for public comment on the changes after the preview period ends in July 2012.

The improvements to SMS are based on ongoing analysis and feedback from enforcement personnel, the motor carrier industry, and other stakeholders. The changes more effectively identify and prioritize high-risk and other unsafe motor carriers for enforcement interventions designed to reduce commercial motor vehicle crashes and hazardous materials incidents.

Motor carriers currently have the ability to preview how the improvements impact their individual safety data in SMS. These improvements include: (1) Changes to the SMS methodology that identify higher risk carriers while addressing industry biases; (2) better applications of SMS results for Agency interventions by more accurately identifying safety sensitive carriers (i.e., carriers transporting people and carriers hauling hazardous materials (HM)), so that such firms can be selected for CSA interventions at more stringent levels, and, (3) more specific fact-based displays of SMS results on the SMS Web site.

The data preview may be found at <http://csa.fmcsa.dot.gov/>. During the data preview period, the Agency requests comments on the impacts of the changes.

3. VEHICLE MAINTENANCE BASIC - INSPECTION-REPAIR-MAINTENANCE PROCESS BREAKDOWN: Meaningful Action

DESCRIPTION OF PROCESS BREAKDOWN:


Savannah Traders LLC's violations occurred due to a breakdown regarding the Meaningful Action elements of compliance within this section. Carrier has failed to implement a meaningful preventative maintenance program. When mechanical issues arise, owner Charles Mulengo ensures that the deficiencies are corrected typically within a timely fashion. That said, there doesn't appear to be a regular maintenance schedule that all drivers and vehicles are adhering to. This must be remedied immediately if the carrier is to lower their ISS2 score. Furthermore, during the course of this review it was revealed that a company driver violated an OOS order stemming from a roadside inspection conducted on 01-28-2019. This is a very serious violation. If a driver or vehicle is placed out of service, the violation MUST be corrected before that vehicle combination is operated again. Driver Michael Ledford was placed out of service on four different occasions within the last 365 days. This is a major problem and one that negatively affects a company. Carrier must commit to meaningful action regarding driver behaviors to prevent damage to the business. Utilize the documents provided during the course of this review to assist you regarding compliance. If you have any questions or needs, please don't hesitate to contact me.

BASIC SPECIFIC RECOMMENDED REMEDIES

Implement Safety Improvement Practices: The following are recommended practices related to Meaningful Action.

- Design and implement incentives and/or recognition programs in order to reward and encourage effective performance related to compliance with vehicle inspection, repair, and maintenance regulations and company policies - for example, to include bonuses, gift certificates, and/or verbal recognition to drivers for a clean Level 1 inspection report.
- Give employees immediate feedback, and require corrective action as soon as the company is aware that vehicle inspection, repair, and maintenance responsibilities are not being fulfilled.
- Provide remedial training to employees with performance issues related to vehicle inspection, repair, and maintenance that can be addressed by enhancing their knowledge and skills.
- Implement a disciplinary policy where potential disciplinary measures correspond to risk posed, with violations associated with high-consequence accidents or incidents being punished more severely.
- Discipline carrier officials for knowingly and willfully allowing violations of vehicle-inspection, repair, and maintenance-related regulations, such as allowing a driver to use a truck that is in disrepair.



	SAVANNAH TRADERS LLC U.S. DOT #: 2551471	Review Date: 04/16/2019
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Part B Requirements and/or Recommendations

- If the problem related to vehicle maintenance is systemic, make adjustments to one or more of the Safety Management Processes (Policies and Procedures, Roles and Responsibilities, etc.).

Seek Out Resources.

- You are encouraged to review your company's record at the following website. <http://a1.fmcsa.dot.gov/SMS> You will need to use your PIN Number that has been provided by the FMCSA.
- Contact industry associations to get resources and ideas on safety improvement practices from other carriers in the industry.



ATTACHMENT “B”



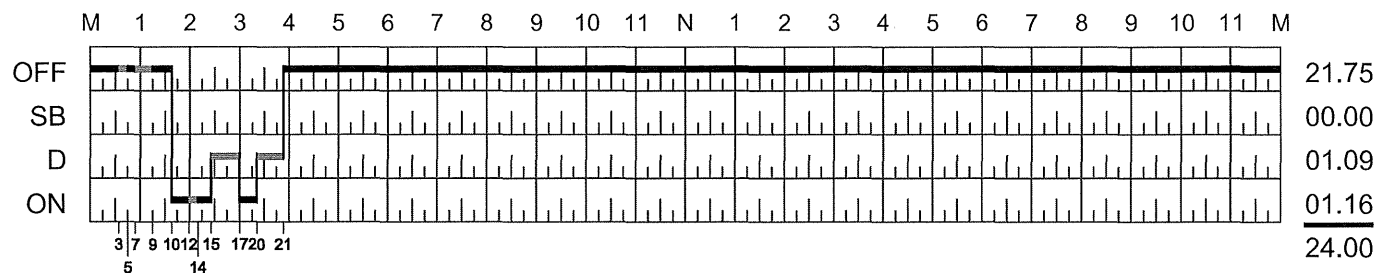
DRIVER'S DAILY LOG

USA Property 70 hour / 8 day

Log Date: January 30, 2019

Print Date: April 05, 2019

Driver	MICHAEL LEDFORD	ID	1946	Co-Drivers	None
Driver License	2308695, NC	Exempt Driver	No		
Distance	66 mi	Engine Hours	38902 - 38911.8		
Odometers	1,234,184 - 1,234,251				
Shipping Docs	Bol#7211. Multi_pack solutions Greenville S.C. to Kansas City ,Mo. Via forest city n.c. Waynesville ,N.C.bol##00446000189009366spring hills. To dunn n.c.shipment#1150449863 west union s.c.tosaint joseph mo.				
Current Location	Kansas City, KS	24-Period Starting	Midnight		
Data Diag. Indicators	No	ELD Malfn. Indicators	No		
ELD ID	KTIELD				
Vehicles and VINs	11 (1XP7DB9X26D884005)				
Trailers	V. 102, 8081				
Carrier and DOT#	SAVANNAH TRADERS LLC (2551471)				
Main Office	12904 W 108TH STREET, OVERLAND PARK, KS, 66210				



No.	Status	Start (CST)	Duration	Location	Engine	Odo	Notes
1	Off Duty Driver	12:00:00 AM	34 min 1 sec	5.3 mi E of Odessa, MO			
2	PC Started	12:34:01 AM	-	5.3 mi E of Odessa, MO	38902		
3	Off Duty ELD Pers Conv	12:34:01 AM	11 min 40 sec	5.3 mi E of Odessa, MO	38902	1,234,184	
4		12:45:41 AM	-	11.8 mi E of Odessa, MO	38902.1		
5	Off Duty Driver	12:45:41 AM	9 min 6 sec	11.8 mi E of Odessa, MO	38902.1	1,234,191	
6	PC Started	12:54:47 AM	-	11.8 mi E of Odessa, MO	38902.3		
7	Off Duty ELD Pers Conv	12:54:47 AM	20 min 19 sec	11.8 mi E of Odessa, MO	38902.3	1,234,191	
8		1:15:06 AM	-	Odessa, MO	38902.7		
9	Off Duty Driver	1:15:06 AM	22 min 54 sec	Odessa, MO	38902.7	1,234,206	
10	On Duty Driver	1:38:00 AM	21 min 6 sec	Odessa, MO			Truck repair, pre trip inspection
11	YM Started	1:59:06 AM	-	Odessa, MO	38903.4		Truck repair, pre trip inspection
12	On Duty ELD Yard Move	1:59:06 AM	11 min 25 sec	Odessa, MO	38903.4	1,234,206	Truck repair, pre trip inspection

13		2:10:31 AM	-	Oak Grove, MO	38903.6	
14	On Duty Driver	2:10:31 AM	15 min 39 sec	Oak Grove, MO	38903.6	1,234,213
15	Driving ELD	2:26:10 AM	34 min 18 sec	Oak Grove, MO	38903.9	1,234,213
16	Int Location	2:56:11 AM	-	Kansas City, MO	38904.3	
17	On Duty Driver	3:00:28 AM	21 min 31 sec	Kansas City, MO	38904.4	1,234,239 Safety Check / Fueling
18	Engine Shutdown	3:03:22 AM	-	Kansas City, MO	38904.5	
19	Engine Power Up	3:19:04 AM	-	Kansas City, MO	38904.5	
20	Driving ELD	3:21:59 AM	31 min 3 sec	Kansas City, MO	38904.5	1,234,239
21	Off Duty Driver	3:53:02 AM	20 hr 6 min 58 sec	Kansas City, KS	38905	1,234,251
22	Engine Shutdown	8:58:56 AM	-	Kansas City, KS	38910.1	
23	Engine Power Up	2:35:26 PM	-	Kansas City, KS	38910.1	
24	Engine Shutdown	2:42:20 PM	-	Kansas City, KS	38910.2	
25	Engine Power Up	5:48:21 PM	-	Kansas City, KS	38910.2	
26	Engine Shutdown	6:06:37 PM	-	Kansas City, KS	38910.5	
27	Engine Power Up	6:14:13 PM	-	Kansas City, KS	38910.5	
28	Engine Shutdown	6:27:45 PM	-	Kansas City, KS	38910.8	
29	Engine Power Up	6:32:30 PM	-	Kansas City, KS	38910.8	
30	Engine Shutdown	7:33:54 PM	-	Kansas City, KS	38911.8	
31	Cert	Jan 31 4:48:08 PM	-			

Recap						
1/23	1/24	1/25	1/26	1/27	1/28	1/29
7.86	7.61	8.91	5.73	2.31	8.74	0.00
Total Hours Since Restart		41.15				
Hours Available Today		28.85				
Hours Worked Today		2.25				

Odometers			
Vehicle	Start	End	Distance
11	1,234,184	1,234,191	7 mi
11	1,234,191	1,234,205	14 mi
11	1,234,205	1,234,213	8 mi
11	1,234,213	1,234,239	26 mi
11	1,234,239	1,234,250	11 mi

I certify that these entries are true and correct

Michael
J. J. Ford
Driver Signature

ATTACHMENT “C”

DRIVER/VEHICLE EXAMINATION REPORT

Missouri State Highway Patrol
Commercial Vehicle Enforcement Division
P.O. Box 568, Jefferson City, MO 65102-0568
Phone: (573)526-6128 Fax: (573)526-4637
Email: cvemail@mshp.dps.mo.gov

Report Number: MOW142001858
Inspection Date: 01/28/2019
Start: 6:40 PM CT End: 8:05 PM CT
Inspection Level: I - Full
HM Inspection Type: None

SAVANNAH TRADERS LLC
12904 W 108TH STREET
OVERLAND PARK, KS, 66210-1108
USDOT: 2551471 Phone#:
MC/MX#: 888950 Fax#:
State#:
Location: MAYVIEW POST A3 EAST
Highway: I-70

Driver: LEDFORD, MICHAEL R
License#:
Date of Birth:
CoDriver:
License#:
Date of Birth:
State: NC
State:

Milepost: 43 Shipper: THE CLOROX SALES CO
Origin: SPRING HILL, KS Bill of Lading:
446000190260299
Destination: INDIAN TRAIL, NC Cargo: ANIMAL LITTER

VEHICLE IDENTIFICATION

Unit	Type	Make	Year	State	Plate	Equipment ID	VIN	GVWR	CVSA #	Issued #	OOS Sticker
1	TT	PTRB	2006	KS	168781	11		384005	50000		W142001858
2	ST	WANC	2005	KS	602428	8081		905507	68000		W142001858

BRAKE ADJUSTMENTS

Axle #	1	2	3	4	5
Right	1 1/4	1 3/4	2 1/2	1	3/4
Left	1 1/4	1 7/8	2 5/8	3/4	1
Chamber	C-20	C-30	C-30	L-30	L-30

VIOLATIONS

Section	Type	Unit	OOS	Citation #	Verify	Crash	Violations Discovered
393.209D	F	1	Y		U	N	Steering system components worn, welded, or missing
393.45UV	F	1	Y		U	N	Brake Tubing and Hose Adequacy Under Vehicle
393.47E	F	1	N		N	N	Clamp or Roto type brake out-of-adjustment
393.53B	F	1	N		N	N	CMV manufactured after 10/19/94 has an automatic airbrake adjustment system that fails to compensate for wear
393.47E	F	1	N		N	N	Clamp or Roto type brake out-of-adjustment
396.3A1B	F	2	N		N	N	Brakes (general) Explain
396.3A1BOS	F	1	Y		U	N	BRAKES OUT OF SERVICE: The number of defective brakes is equal to or greater than 20 percent of the service brakes on the vehicle or combination
393.9H	F	1	N		N	N	Inoperable head lamps
393.24A	F	1	N		N	N	Non-compliance with headlamp requirements
393.9	F	1	N		N	N	Inoperable Required Lamp
393.9	F	1	N		N	N	Inoperable Required Lamp
393.9T	F	1	N		N	N	Inoperable tail lamp
393.11	F	2	N		N	N	No or defective lighting devices or reflective material as required
393.75A3	F	2	Y		U	N	Tire-flat and/or audible air leak
393.207F	F	2	Y		U	N	Air suspension pressure loss

HazMat: No HM transported

Placard:

Cargo Tank:

Special Checks: No data for special checks

Notes: R7996094

* I hereby declare the above vehicle(s)/drivers as "OUT OF SERVICE" No person shall remove the "OUT OF SERVICE" sticker(s) applied to this/these vehicle(s) or operate such vehicle(s) until the OUT-OF-SERVICE defect(s) has/have been repaired and vehicle(s) restored to a safe operating condition.

I certify that the above violation(s) was/were corrected

Signature Of Repairer X. _____ Facility: _____ Date _____



DRIVER/VEHICLE EXAMINATION REPORT

Missouri State Highway Patrol
Commercial Vehicle Enforcement Division
P.O. Box 568, Jefferson City, MO 65102-0568
Phone: (573)526-6128 Fax: (573)526-4637
Email: cvemail@mshp.dps.mo.gov

Report Number: MOW142001858
Inspection Date: 01/28/2019
Start: 6:40 PM CT End: 8:05 PM CT
Inspection Level: I - Full
HM Inspection Type: None

NOTICE TO DRIVER/MOTOR CARRIER. The motor carrier name that appears on this report must sign the certification and fax, mail to the Missouri State Highway Patrol, Commercial Vehicle Enforcement Division, P.O. Box 568, Jefferson City, MO 65102-0568 or Email to cvemail@mshp.dps.mo.gov within 15 days. If no violations were discovered, you are NOT required to sign and return a copy of the report.

****Warning**** If this box is checked(☐) A separate traffic citation was issued to the violator. Please refer to the issued traffic citation for additional information.

DO NOT send fine payment with the return of this report.

Signature Of Motor Carrier X _____ Title _____ Date _____

Report Prepared By: C. WARNER
Badge #: W142

Copy Received By:
MICHAEL LEDFORD

X _____

X _____



CERTIFICATE OF SERVICE

19-TRAM-429-PEN

I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of first class mail/hand delivered on 05/03/2019.

AHSAN LATIF, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Fax: 785-271-3354
a.latif@kcc.ks.gov

CHARLES MULENGO, MANAGING MEMBER
SAVANNAH TRADERS LLC
12904 W 108TH ST
OVERLAND PARK, KS 66210-1108
Fax: 888-411-2820
trader@savannahtraders.com

/S/ DeeAnn Shupe

DeeAnn Shupe