

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

In the Matter of the Investigation of )  
**Precision Towing & Recovery LLC d/b/a** )  
**Precision Towing & Recovery, of** )  
**Wichita, Kansas,** Regarding the Violation )  
of the Motor Carrier Safety Statutes, Rules ) Docket No. 25-TRAM-086-PEN  
and Regulations and the Commission's )  
Authority to Impose Penalties, Sanctions )  
and/or the Revocation of Motor Carrier )  
Authority. )

**MOTION TO SUSPEND INTRASTATE MOTOR CARRIER AUTHORITY**

The Staff of the State Corporation Commission of the State of Kansas (Staff), by and through its counsel, files its motion requesting the Commission suspend Precision Towing & Recovery LLC d/b/a Precision Towing & Recovery of Wichita, Kansas (Carrier) from all intrastate commercial motor carrier operations. In support of its Motion, Staff states as follows:

1. Carrier is a motor carrier as defined in 49 C.F.R. 390.5, as adopted by K.A.R. 82-4-3f, in that it operates commercial motor vehicle(s) in intrastate commerce.
2. Carrier is registered as a motor carrier with the U.S. Department of Transportation (USDOT) and operates under USDOT number 2987341.
3. A Staff Special Investigator made numerous attempts to contact Carrier to facilitate a safety compliance review on its operations as a motor carrier.
4. Ahsan Latif, Litigation Counsel, wrote and mailed Carrier a letter on April 23, 2024, informing Carrier that should it continue to resist by failing to respond, the Commission may suspend its motor carrier operations, revoke or amend certificates, and/or initiate sanctions or fines against Carrier. The letter gave Carrier ten (10) days from the date of the letter to respond. A copy of the letter is attached hereto as Attachment "A" and is hereby incorporated by reference.

5. As of July 15, 2024, the Special Investigator and Litigation Counsel Ahsan Latif have not heard from Carrier to schedule a motor carrier safety compliance review.

6. Staff asks that the Commission find Carrier received sufficient notices of the need facilitate a safety compliance review.

7. Staff asks that the Commission find Carrier failed to respond to attempts to contact.

8. Based on the presented facts, Staff requests the Commission issue an order suspending Carrier's intrastate motor carrier authority operations until such time as Carrier contacts the Special Investigator or Litigation Counsel Ahsan Latif to cooperate with Staff and permit a safety compliance review, at which time Staff will recommend the Commission issue an order of reinstatement of intrastate motor carrier operations.

**WHEREFORE**, for the reasons stated above, Staff respectfully requests that the Commission issue an order suspending Carrier's intrastate motor carrier operations.

Respectfully submitted,

*/s/ Ahsan Latif*

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Ahsan A. Latif, #24709  
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Kansas Corporation Commission  
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Topeka, Kansas 66604  
(785) 271-3118 (Telephone)  
(785) 271-3124 (Facsimile)  
[ahsan.latif@ks.gov](mailto:ahsan.latif@ks.gov) (E-mail)  
For Commission Staff

## **ATTACHMENT “A”**

1500 SW Arrowhead Road  
Topeka, KS 66604-4027



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

Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Annie Kuether, Commissioner

Laura Kelly, Governor

April 23, 2024

Jesse Lee Cooper, Sole Member  
Precision Towing & Recovery LLC  
923 W 54<sup>th</sup> St. S  
Wichita, KS 67217-5464

Re: Compliance Investigation

Dear Jesse Lee Cooper:

The Kansas Corporation Commission is given full power, authority and jurisdiction to supervise and control motor carriers - as defined in the Kansas statutes - doing business or procuring business in Kansas, and may do all things necessary and convenient for the exercise of such power, authority and jurisdiction.

From time to time, the commission is required to carefully examine and inspect the condition of each motor carrier, its equipment, the manner of its conduct and its management with reference to the public safety and convenience. Further, the Commission has the authority to investigate an entity under the Commission's jurisdiction and order a hearing when the Commission believes the entity is in violation of the law or any order of the Commission.

Deliberate avoidance of a Commission-sponsored safety compliance review is a violation of the above-stated law and authority. Precision Towing & Recovery LLC is considered a motor carrier that is subject to the Commission's jurisdiction, and therefore, is required by law to submit to Commission compliance reviews.

Commission Special Investigator (SI) Matthew Rose has made several attempts to facilitate a compliance review with you, to no avail. Phone calls and emails from SI Rose to you have been unsuccessful. This letter therefore serves to notify you that should you continue to resist by failing to contact SI Rose within ten days of the date of this letter the Commission may suspend your motor carrier operations, revoke or amend certificates, and/or initiate sanctions or fines against you.

Thank you for your cooperation. If you have any further questions, you may contact SI Matthew Rose at 785-623-0541.

Sincerely,  
*/s/ Ahsan A. Latif*  
Ahsan A. Latif  
Litigation Counsel

## **CERTIFICATE OF SERVICE**

25-TRAM-086-PEN

I, the undersigned, certify that a true copy of the attached Motion has been served to the following by means of electronic service on July 16, 2024.

Jesse Cooper, SOLE MEMBER  
Precision Towing & Recovery LLC  
923 W 54th St S  
Wichita, KS 67217  
jcooper@precisiontowing.biz

AHSAN LATIF, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
ahsan.latif@ks.gov

/S/ Kiley McManaman  
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Kiley McManaman