

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

In the Matter of the Investigation of **Jeff's**)
Towing & Recovery LLC, of Garnett,)
Kansas, Regarding the Violation of the)
Motor Carrier Safety Statutes, Rules and)
Regulations and the Commission's)
Authority to Impose Penalties, Sanctions)
and/or the Revocation of Motor Carrier)
Authority.)
)

Docket No. 25-TRAM-143-PEN

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 Jeff's Towing & Recovery LLC of Garnett, 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 2350556.
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 July 18, 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 August 30, 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

Ahsan A. Latif, #24709
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604
(785) 271-3118 (Telephone)
(785) 271-3124 (Facsimile)
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

July 18, 2024

Jeff's Towing & Recovery LLC
Attn: Jeff Chandler
1110 E 4th Terrace
Garnett, KS 66032

Re: Scheduling a Compliance Review

Dear Mr. Chandler:

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. Jeff's Towing & Recovery LLC is 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) Wade Patterson has made several attempts to facilitate a compliance review with you, to no avail. This letter therefore serves to notify you that should you continue to resist by failing to contact SI Patterson and refusing to submit to a compliance review, **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 Wade Patterson with the Transportation Division of the Kansas Corporation Commission at (785) 640-9132.

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

CERTIFICATE OF SERVICE

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I, the undersigned, certify that a true copy of the attached Motion has been served to the following by means of electronic service on August 30, 2024.

Jeff Chandler, OWNER
Jeff's Towing & Recovery LLC
1110 E 4th Terrace
Garnett, KS 66032
jeffstowing@gmail.com

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

/S/ Kiley McManaman
Kiley McManaman
