

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

In the Matter of the Investigation of **Let's Talk Moving** )  
**LLC, of Olathe, Kansas**, Regarding the Violation(s) of )  
the Motor Carrier Safety Statutes, Rules and Regulations )  
and the Commission's Authority to Impose Penalties, ) Docket No. 24-TRAM-026-PEN  
Sanctions and/or the Revocation of Motor Carrier )  
Authority. )  
)

**STAFF'S MOTION TO VACATE PENALTY ORDER**

The Staff of the State Corporation Commission of the State of Kansas (Staff), by and through its counsel, files its Motion to Vacate the Penalty Order issued to Let's Talk Moving LLC (Carrier). In support of its Motion, Staff states as follows:

1. On July 12, 2023, Commission Staff UCR Manager Verna Jackson submitted a Report and Recommendation regarding Carrier's failure to pay its Unified Carrier Registration (UCR) fees for year 2023. As explained by Ms. Jackson, motor carriers must pay annual UCR fees in order to lawfully operate in interstate commerce.<sup>1</sup>

2. On July 20, 2023, the Commission issued a Penalty Order in this docket assessing a \$300 civil penalty against Carrier for failure to pay its 2023 UCR fees.

3. Carrier contacted Staff after the issuance of the Penalty Order stating that Carrier had updated its USDOT profile to intrastate on July 3, 2023, prior to the issuance of the Penalty Order.

4. Staff confirmed Carrier's USDOT profile indicates it is an intrastate carrier. Additionally, after reviewing available records, Staff could not find evidence the carrier was found operating in interstate commerce. Staff therefore determined the Penalty Order issued for not paying their 2023 UCR fees should be vacated.

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<sup>1</sup> Staff's R&R, p. 1 (July 12, 2023).

5. Therefore, based on the facts stated above, Staff requests the Commission vacate the Penalty Order issued to Carrier on July 20, 2023.

**WHEREFORE**, for the reasons stated above, Staff respectfully requests the Commission vacate the Penalty Order issued to Let's Talk Moving LLC in this docket on July 20, 2023.

Respectfully submitted,

*/s/ Ahsan Latif*

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For Commission Staff

**CERTIFICATE OF SERVICE**

24-TRAM-026-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 October 20, 2023.

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/S/ KCC Docket Room  
KCC Docket Room

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