

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

In the Matter of the Investigation of **Jadwin** )  
**Construction & Development, LLC, of** )  
**Hiawatha, Kansas,** Regarding the )  
Violation of the Motor Carrier Safety )  
Statutes, Rules and Regulations and the ) Docket No. 20-TRAM-075-OOS  
Commission's Authority to Impose )  
Penalties, Sanctions and/or the Revocation )  
of Motor Carrier Authority. )

**MOTION TO REINSTATE INTRASTATE MOTOR CARRIER OPERATIONS**

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 Jadwin Construction & Development, LLC of Hiawatha, Kansas (Respondent) from all intrastate commercial motor carrier operations. In support of its Motion, Staff states as follows:

1. Respondent is a motor carrier as defined in K.A.R. 82-4-1, that operates commercial motor vehicle(s) in intrastate commerce.
2. Respondent is registered as a motor carrier with the U.S. Department of Transportation (USDOT) and operates under USDOT number 2791648.
3. On August 16, 2019, Transportation Staff filed a Motion to Suspend Respondent's Intrastate Motor Carrier Operations due to it not complying with Ordering clause B of the Penalty Order issued to it on April 17, 2018. Ordering clause B. states the carrier must submit to one follow-up safety compliance review within the next 18 months."
4. On August 22, 2019, the Commission issued an Order Suspending Motor Carrier Operations of Respondent.

5. Transportation Staff has advised that Respondent has provided the documentation and information required to conduct a safety compliance review and is now in compliance with ordering clause B. of the Penalty Order.

6. Based on the presented facts, Staff requests the Commission issue an order reinstating Respondent's intrastate motor carrier authority operations.

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

Respectfully submitted,



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Ahsan A. Latif, #24709  
Litigation Counsel  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, Kansas 66604  
(785) 271-3181 (Telephone)  
(785) 271-3124 (Facsimile)  
[a.latif@kcc.ks.gov](mailto:a.latif@kcc.ks.gov) (E-mail)

For Commission Staff

**VERIFICATION**

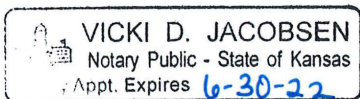
STATE OF KANSAS                    )  
  ) ss.  
COUNTY OF SHAWNEE            )


Ahsan A. Latif, of lawful age, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas; that he has read and is familiar with the foregoing *Motion to Reinstate Motor Carrier Operations*, and attests that the statements therein are true and correct to the best of his knowledge, information and belief.



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Ahsan A. Latif, S. Ct. # 24709  
Litigation Counsel  
The State Corporation Commission  
of the State of Kansas

SUBSCRIBED AND SWORN to before me this 4<sup>th</sup> day of September, 2019.



  
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Notary Public

My Appointment Expires: June 30, 2022


## CERTIFICATE OF SERVICE

20-TRAM-075-OOS

I, the undersigned, certify that a true and correct copy of the above and foregoing Motion to Reinstate Motor Carrier Operations was placed in the United States mail, postage prepaid, or hand-delivered this 4th day of September, 2019, to the following:

DEBORAH JADWIN, MEMBER  
JADWIN CONSTRUCTION & DEVELOPMENT LLC  
PO BOX 416  
HIAWATHA, KS 66434  
shelby@jcd-llc.com

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

  
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Vicki Jacobsen