

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

In the Matter of the Investigation of )  
**Bullseye Transporting LLC, of Belle** )  
**Plaine, Kansas**, Regarding the Violation of ) Docket No. 24-TRAM-412-PEN  
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. )

**MOTION TO SUSPEND 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 Bullseye Transporting LLC of Belle Plaine, 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. Part 390.5, as adopted by K.A.R. 82-4-3f, that 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 2724658.
3. Special Investigator Matt Rose has made attempts to contact Carrier to facilitate a safety compliance investigation on its operations as a motor carrier.
4. Ahsan Latif, Litigation Counsel, sent Carrier a letter on August 14, 2023, 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 November 28, 2023, Special Investigator Matt Rose and Litigation Counsel Ahsan Latif have not heard from Carrier to comply with a motor carrier safety compliance investigation.

6. Staff asks that the Commission find Carrier received sufficient notices of the need to comply with the safety compliance investigation.

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

8. Staff asks the Commission find that Carrier's resistance to respond to Special Investigator Matt Rose's attempts to contact and Litigation Counsel Ahsan Latif's letter poses a potential immediate threat to the safety and welfare of the public of the state of Kansas.

9. 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 Special Investigator Matt Rose to facilitate a compliance investigation, 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.

Respectfully submitted,

/s/ Ahsan A. Latif

Ahsan A. Latif, #24709

Litigation Counsel

Kansas Corporation Commission

1500 SW Arrowhead Road

Topeka, Kansas 66604

(785) 271-3118 (Telephone)

[a.latif@kcc.ks.gov](mailto:a.latif@kcc.ks.gov) (E-mail)

For Commission Staff

# **ATTACHMENT “A”**

Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Laura Kelly, Governor

August 14, 2023

Richard Stanley  
Bullseye Transporting LLC  
108 N. Merchant  
Belle Plain, KS 67013

Re: Compliance Investigation

Dear Mr. Stanley:


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. Bullseye Transporting 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. To date there has been no response by you to phone calls or emails from SI Rose. 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 316-518-2517.

Sincerely,  
  
Ahsan A. Latif  
Litigation Counsel

**CERTIFICATE OF SERVICE**

24-TRAM-412-PEN

I, the undersigned, certify that a true copy of the attached Motion has been served to the following by means of first class mail and electronic service on November 29, 2023.

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

Richard Stanley II., OWNER  
Bullseye Transporting LLC  
PO Box 574  
Belle Plaine, KS 67013  
rickstanley.776@gmail.com

/S/ Kiley McManaman  
Kiley McManaman

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