

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

In the Matter of the Investigation of **J&A Renovations LLC of Olathe, 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. 26-TRAM-129-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 J&A Renovations LLC of Olathe, Kansas (Carrier) from all intrastate commercial motor carrier operations. In support of its Motion, Staff states as follows:

1. Pursuant to K.S.A. 66-1,108b, 66-1,111, 66-1,112g, and 66-1,115, the Commission is given full power, authority and jurisdiction to supervise and control motor carriers, as defined in 40 C.F.R. 390.5 as adopted by K.A.R. 82-4-3f, doing business or procuring business in Kansas, and is empowered to do all things necessary and convenient for the exercise of such power, authority, and jurisdiction.

2. Pursuant to K.S.A. 66-1,129(a)(7), no public motor carrier of property, household goods or passengers or private motor carrier of property shall operate, or allow the operation of, any commercial motor vehicle on any public highway in this state without following rules and regulations consistent with the federal motor carrier safety assistance program.

3. K.S.A. 66-1,108c states:

“The corporation commission shall have the authority to examine all accounts and records pertaining to its regulation of motor carriers. The agents, accountants, examiners or inspectors designated by the commission shall have authority under the direction of the transportation division to inspect and examine any and all books,

accounts, papers, records, property and memoranda pertinent to its regulation of motor carriers.”

4. 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.

5. Carrier is registered as a motor carrier with the U.S. Department of Transportation (USDOT) and operates under USDOT number 4422748. Carrier’s USDOT Profile was updated on June 19, 2025, by the filing of an MCS-150 file that lists its current physical and mailing address, phone number and email address. A copy of Carrier’s MCS-150 form is attached hereto as Attachment “A” and is hereby incorporated by reference.

6. On October 14, 2025, a Staff Special Investigator (SI) contacted the Carrier by phone and e-mail correspondence to schedule a compliance investigation. There was no response to these attempts at contact.

7. Ahsan Latif, Litigation Counsel, wrote and mailed Carrier a letter to the address listed on its MCS-150 form on October 15, 2025, 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 Carrier was given ten (10) days from the date of the letter to respond and contact the special investigator. A copy of the letter is attached hereto as Attachment “B” and is hereby incorporated by reference.

8. As October 29, 2025, the Special Investigator and Litigation Counsel have not been contacted by Carrier to complete the safety compliance investigation or otherwise.

9. Staff asks that the Commission find Carrier received sufficient notice of the need facilitate a safety compliance review, including written notice by Litigation Counsel’s October 15, 2025, letter.

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

11. 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 to cooperate with Staff and permit the 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
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For Commission Staff

ATTACHMENT “A”

ATTACHMENT “B”

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

Laura Kelly, Governor

October 15, 2025

J&A Renovations LLC
Attn: Adan Sanchez
313 N Olathe View Road
Olathe, KS 66061

Re: Responding to Transportation Division Staff

Dear Mr. Sanchez:

I am an attorney with the Kansas Corporation Commission (KCC), contacting you regarding a compliance matter. KCC Transportation Special Investigator (SI) Matt Adams has made attempts to contact you as part of a compliance review of your company, to no avail. This letter serves to notify you that if you fail to contact SI Adams and permit a safety 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, pursuant to K.S.A. 66-1, 129a. If you have any further questions, you may contact SI Adams with the Transportation Division of the KCC at (785) 414-0625.

K.S.A. 66-1,108b grants the KCC the “power, authority and jurisdiction to supervise and control motor carriers” operating in this state. Dietz’s Destinations LLC is a motor carrier that is subject to the Commission’s jurisdiction and therefore is required by law to submit to a Commission compliance investigation. Deliberate avoidance of a Commission-sponsored safety compliance review is a violation of K.S.A. 66-1,108c. Failure to respond to this letter will result in further enforcement actions, including but not limited to suspension of your Kansas intrastate operations and fines.

Thank you for your attention to this matter.

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

CERTIFICATE OF SERVICE

26-TRAM-129-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 29, 2025.

AHSAN LATIF, LITIGATION COUNSEL
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/S/ Kiley McManaman

Kiley McManaman