

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

In the Matter of the Investigation of **Affordable**)
Movers LLC, of Kansas City, Missouri, Pursuant to)
the Kansas Highway Patrol Issuance of a Notice of) Docket No. 25-GIMM-220-KHP
Violation(s) and Invoice for the Violations of the)
Kansas Motor Carrier Safety Statutes, Rules and)
Regulations.)

NOTICE OF FILING OF REQUEST FOR HEARING

The attached Request for Hearing was received on November 18, 2024 from Affordable Movers LLC (Carrier). The attached documents include:

1. Driver/Vehicle Examination Report KSHP20082285 with Inspection Notes, dated September 26, 2024.
2. Driver/Vehicle Examination Report KSHP20082285 Signed by Driver listing the OOS violation, dated September 26, 2024.
3. Notice of Violations/Invoice #H000607810, dated October 1, 2024.
4. Second Notice of Violations/Invoice #H000607810, dated November 5, 2024.
5. Carrier Contest of Violations, dated November 11, 2024
6. KHP Denial, dated November 15, 2024.
7. Carrier Request for Hearing, dated November 15, 2024.

WHEREFORE, the attached Request for Hearing and corresponding documents are hereby filed for consideration by the Commission.

Respectfully submitted,

/s/ Ahsan Latif

Ahsan A. Latif, S. Ct. #24709
Litigation Counsel
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, Kansas 66604-4027
Phone: 785-271-3118
Fax: 785-271-3167
Email: a.latif@kcc.ks.gov

Attorney for Commission Staff

DRIVER/VEHICLE EXAMINATION REPORT

Kansas Highway Patrol
Khp.TruckInspection@KS.GOV
700 SW Jackson, Ste 704
Topeka, KS 66603
Phone #: (785)296-7189 Fax #: (785)296-2858

Report Number: KSHP20082285
Inspection Date: 9/26/2024 Certification Date: 10/15/2024
Time Started: 14:40 Time Ended: 15:25
Inspection Level: II - Walk-Around
HM Inspection Type: Non Bulk Inspection

AFFORDABLE MOVERS LLC
6921 E 111TH #9842
KANSAS CITY, MO 64134
USDOT #: 02826489
MC/MX #:
State #:

Phone #: (816)695-7599
Fax #:

Driver: JONES, KORDAN A
License #: [REDACTED] State: MO
Date of Birth: [REDACTED]

Location: OLATHE SOUTH M.C.I.S. #24W MilePost: 213
Highway: I 35 Origin: OVERLAND PARK,KS Bill of Lading: 73334604
County: JOHNSON Destination: KANSAS CITY,KS Cargo: HONDA ACCORD/ UN1203
Shipper: COPART

VEHICLE IDENTIFICATION:

Unit	Type	Make	Year	State	License#	Equipment ID	Unit VIN	GVWR	CVSA #	CVSA Issued #	OOS Stkr.#
1	TR	FORD	2016	OK	[REDACTED]	107	[REDACTED]	3759	19,500		

BRAKE ADJUSTMENTS: No brake measurements recorded

VIOLATIONS :

Vio Code	Section	Unit	OOS	State Citation Number	Verify*	Crash	Violation Description
390.21TB	390.21T(b)	1	N		N	N	Carrier name and/or USDOT Number not displayed as required: Carrier name displayed on truck as "AFFORDABLE MOVERS" carrier legal name is "AFFORDABLE MOVERS LLC" with no DBA listed for carrier.
392.9A2	392.9(a)(2)	1	Y		U	N	Failing to secure vehicle equipment: Tire and wheel on deck of truck not secured free to move on deck of truck
393 9	393 9(a)	1	N		N	N	Inoperable Required Lamp License plate lamp on rear of truck not working
392 2	392 2	D	N	WA0156842	N	N	Violation of Local Laws Explain KSA 8 1574(b), Driver backed down shoulder of highway and exit ramp to scale

* N Non OOS or Driver OOS Violation; U Unknown

HazMat: 3 Flammable, Placard: No Cargo Tank:

Special Checks:

<input type="checkbox"/> Alcohol/Controlled Substance Check	<input checked="" type="checkbox"/> Traffic Enforcement	<input type="checkbox"/> Post Crash Inspection
<input type="checkbox"/> Conducted by Local Jurisdiction	<input type="checkbox"/> PASA Conducted Inspection	<input type="checkbox"/> PBBT Inspection
<input type="checkbox"/> Size and Weight Enforcement	<input type="checkbox"/> Drug Interdiction Search	Arrests:
<input type="checkbox"/> ESscreening		

Inspection Notes: Driver drove past open scale and then stopped on right shoulder and backed up highway onto exit lane from scale. Contact made with driver Driver stated that he backed up the shouler because he drove past scale Factory GVWR located for truck Carrier name displayed on truck as "AFFORDABLE MOVERS" carrier legal name is "AFFORDABLE MOVERS LLC" with no DBA listed for carrier. A spare tire and wheel was on bed of tow truck, not secured License plate lamp on truck not working Truck OOS for load securement Driver clear CDLIS

INTERNAL RDR Carrier is contesting violation 392 9A2 Tire and wheel on deck of truck not secured free to move on deck of truck

Carrier says during the inspection the Inspector noticed he had a spare tire in bed in front of a vehicle Driver put tire inside vehicle being towed

Internal RDR was requested outside of the 30 days stated on invoice all fines and violations remain valid TWare 11/15/2024

Special Study Fields:

Special Study1:	Special Study6:
Special Study2	Special Study7
Special Study3	Special Study8
Special Study4	Special Study9
Special Study5	Special Study10

Report Prepared By:

J. Wilson

Badge #:

2008

Copy Received By:

JONES, KORDAN A

Page 1 of 2



KSHIP20082285

X

X

DRIVER/VEHICLE EXAMINATION REPORT

Kansas Highway Patrol
Khp.TruckInspection@KS.GOV
700 SW Jackson, Ste 704
Topeka, KS 66603
Phone #: (785)296-7189 Fax #: (785)296-2858

Report Number: KSHP20082285
Inspection Date: 9/26/2024 Certification Date: 10/15/2024
Time Started: 14:40 Time Ended: 15:25
Inspection Level: II - Walk-Around
HM Inspection Type: Non Bulk Inspection

AFFORDABLE MOVERS LLC
6921 E 111TH #9842
KANSAS CITY, MO 64134

Driver: JONES, KORDAN A
License #: [REDACTED] State: MO
Date of Birth: [REDACTED]

USDOT #: 02826489 Phone #: (816)695-7599
MC/MX #: Fax #:
State #:

* Pursuant to the authority contained in Title 49, CFR; K.S.A. 66-1,129; K.C.C. Reg. 82-4-3, I hereby declare the above marked unit(s) as "OUT OF SERVICE". No person and/or carrier shall permit and/or require the removal of the "OUT OF SERVICE" stickers or the operation of this motor vehicle until ALL out of service defects have been corrected. This Out of Service condition may result in the assessment of a Civil Penalty being issued against the Carrier indicated on this report. Driver Initials _____

**** DRIVER: THIS FORM IS REQUIRED TO BE RETURNED TO THE CARRIER BY REGULATION. **//** *CARRIER CERTIFICATION: All defects on this sheet must be corrected or acknowledged PRIOR TO RE-DISPATCH and then certified by a responsible carrier official who must sign below. RETURN THIS FORM WITHIN 15 DAYS to the Motor Carrier Division of the KANSAS HIGHWAY PATROL at the address listed at the top of this form.

Signature of Carrier Official: X _____ Date: _____

* NOTE TO MECHANIC: The undersigned certifies that all mechanical defects listed on this report HAVE BEEN CORRECTED at the time of signature.

Signature of Repairer: X _____ Facility: _____ Date: _____

Report Prepared By:
J. Wilson

Badge #:
2008

Copy Received By:
JONES, KORDAN A

Page 2 of 2



KSHP20082285

X _____

X _____

DRIVER/VEHICLE EXAMINATION REPORT

Inspect 1.134.9025



Kansas Highway Patrol
Email: Khp.TruckInspection@KS.GOV
700 SW Jackson, Ste 704
Topeka, KS 66603
Phone: (785)296-7189 Fax: (785)296-2858

Report Number: KSHP20082285
Inspection Date: 09/26/2024
Start: 2:40 PM CT End: 3:25 PM CT
Inspection Level: II - Walk-Around
HM Inspection Type: Non-Bulk

Carrier: AFFORDABLE MOVERS LLC

DBA:

6921 E 111TH #9842

KANSAS CITY, MO, 64134

USDOT: 2826489

Phone#: (816)695-7599

MC/MX#: 1112312

Fax#:

State#:

Location: OLATHE SOUTH M.C.I.S. #24W

Highway: I-35

County: JOHNSON

Driver: JONES, KORDAN A

License#:

State: MO

Date of Birth:

CoDriver:

License#:

State:

Date of Birth:

Milepost: 213 Shipper: COPART

Origin: OVERLAND PARK, KS

Destination: KANSAS CITY, KS

Bill of Lading: 73334604

Cargo: HONDA ACCORD/
UN1203

Email: AFFORDABLEMOVERSKC@GMAIL.COM

VEHICLE IDENTIFICATION

Unit	Type	Make	Year	State	Plate	Equipment ID	VIN	GWR	CVSA #	Issued #	OOS Sticker
1	TR	FORD	2018	OK		107		3759	19500		

BRAKE ADJUSTMENTS: No brake measurements required for level II or level III

VIOLATIONS

Section	Type	Unit	OOS	Citation #	Verify	Crash	Violations Discovered
390.21TB	F	1	N		N	N	Carrier name and/or USDOT Number not displayed as required; Carrier name displayed on truck as "AFFORDABLE MOVERS" carrier legal name is "AFFORDABLE MOVERS LLC" with no DBA listed for carrier.
392.9A2	F	1	Y		U	N	Failing to secure vehicle equipment: Tire and wheel on deck of truck not secured free to move on deck of truck
393.9	F	1	N		N	N	Inoperable Required Lamp: License plate lamp on rear of truck not working
392.2	F	D	N		N	N	Violation of Local Laws - Explain: KSA 8-1574(b), Driver backed down shoulder of highway and exit ramp to scale

HazMat: 3 Flammable

Placard: No

Cargo Tank:

Special Checks:

Alcohol/Controlled Substance Check X
Conducted by Local Jurisdiction
Size and Weight Enforcement
eScreen Inspection

Traffic Enforcement
PASA Conducted Inspection
Drug Interdiction Search

Post Crash Inspection
PBBT Inspection

Pursuant to the authority contained in Title 49, CFR: K.S.A. 66-1, 129; K.C.C. Reg. 82-4-3, I hereby declare the above marked unit(s) as "OUT OF SERVICE." No person and/or carrier shall permit and/or require the removal of the "OUT OF SERVICE" stickers or the operation of the motor vehicle until ALL out of service defects have been corrected. This Out of Service condition may result in the assessment of a Civil Penalty being issued against the carrier indicated on this report. Driver initials: SK

* NOTE TO MECHANIC: The undersigned certifies that all mechanical defects listed on this report HAVE BEEN CORRECTED at the time of signature.
Signature Of Repairer X: [Signature] Facility: BASE Date: 9-27-24

DRIVER: This form is to be sent to the carrier identified on this report within 24 hours of receipt.

MOTOR CARRIER CERTIFICATION: All defects identified on this report must be corrected or acknowledged PRIOR TO RE-DISPATCH, and then certified by a responsible carrier official who must sign below. RETURN THIS FORM WITHIN 15 DAYS to the Motor Carrier Division of the Kansas Highway Patrol at the address listed at the top of this form. If no violations were discovered, you are not required to sign and return a copy.

NOTE: Challenges to violations may be submitted through the Federal Motor Carrier Safety Administration (FMCSA)'s Data Q Challenge process, at <https://dataqs.fmcsa.dot.gov>

Signature Of Motor Carrier X:

Title: Owner Date: 10-5-24

Report Prepared By:

ID/Badge #:

J. Wilson

2008

Copy Received By:

KORDAN JONES

X



Transportation Division
1500 SW Arrowhead Road
Topeka, KS 66604-4027

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



Phone: 785-271-3145
Fax: 785-271-3124
<http://kcc.ks.gov/>
Laura Kelly, Governor

NOTICE OF VIOLATION(S)

October 1, 2024

AFFORDABLE MOVERS LLC
6921 E 111TH #9842
KANSAS CITY, MO 64134

Re: Driver/Vehicle Examination Report # KSHP20082285

This is a Notice of Violation(s) of the Kansas Motor Carrier Safety Statutes and/or Rules and Regulations discovered during a roadside inspection conducted by the Kansas Highway Patrol.

The Kansas Highway Patrol inspected vehicle 1FDUF5GT8GEA53759, on September 26, 2024, and discovered violation(s) of the Federal Motor Carrier Safety Regulations, as adopted by K.S.A. 66-1,129 and K.A.R. 82-4-3 et sq. Pursuant to K.S.A. 66-1, 129a, 66-1,130 and 66-1, 142b, the commission may suspend operations, revoke, or amend certificated, and initiate sanctions or fines against every motor carrier and every person who violates any provision of Kansas law regarding the regulation of such motor carriers and persons, or who fails to obey an order, decision, or regulation of the Commission.

You have thirty (30) days from the date of this letter to pay the fine amount as indicated on the enclosed invoice or thirty (30) days from the date of this letter to submit a review as described below. Failure to address this matter may negatively impact your KCC operating authority or result in the issuance of an Out-of-Service Order in the State of Kansas. You have the following options:

1. Pay the fine amount shown on the enclosed invoice H000607810 to:

Kansas Corporation Commission
1500 SW Arrowhead Rd
Topeka, Kansas 66604
Phone: (785) 271-3145
Fax (785) 271-3124
Email: Transportation@KCC.KS.Gov

2. To contest the violation(s) and/or fines, please specifically describe your contested issues. The KHP will review your issues and either grant, modify or dismiss your challenge. You may first submit a challenge to:

Kansas Highway Patrol
Motor Carrier Safety Assistance Program (MCSAP)
700 SW Jackson, Ste 704
Topeka, KS 66603
Phone: (785) 296-8157
Fax: (785) 296-2858
Email: KHP.TruckInspection@KS.Gov

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KANSAS CORPORATION COMMISSION

Kansas Corporation Commission
Transportation Division
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027
(785) 271-3145
FEIN: 48-1124839

INVOICE

AFFORDABLE MOVERS LLC
6921 E 111TH #9842
KANSAS CITY, MO 64134

Invoice Date: October 1, 2024
Invoice Number: H000607810
Due Date: October 31, 2024

Power Unit Identification at Time of Inspection:

Unit #	Unit Make	Unit License	VIN	License Number	Company ID
1	FORD				107

Unit	Violation	Violation Description	Penalty
1	392.9A2	Failing to secure vehicle equipment	150.00
Total Due:			\$150.00

Please return this invoice with your payment, payable to the
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
Email: Transportation@KCC.KS.GOV
Fax: (785) 271-3124

Payment options: check, money order or credit card

Circle type of credit card: Visa, MasterCard, Discover or American Express

Card Holder Name _____

Credit card number: _____ Expires: Date ____/____/____

Transportation Division
1500 SW Arrowhead Road
Topeka, KS 66604-4027

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



Phone: 785-271-3145
Fax: 785-271-3124
<http://kcc.ks.gov/>
Laura Kelly, Governor

NOTICE OF VIOLATION(S)
Second Notice

November 5, 2024

AFFORDABLE MOVERS LLC
6921 E 111TH #9842
KANSAS CITY, MO 64134

Re: Roadside Driver/Vehicle Examination Report # KSHP20082285

This is a second notice of violation(s) of Kansas Motor Carrier Safety Statutes and/or Rules and Regulations discovered during a roadside inspection conducted by the Kansas Highway Patrol.

The Kansas Highway Patrol inspected vehicle [REDACTED] 3759 on September 26, 2024 and discovered violation(s) of the Federal Motor Carrier Safety Regulations, as adopted by K.S.A. 66-1,129 and K.A.R. 82-4-3 et seq. The civilly assessed violation(s) are set out in the attached invoice along with the fine(s) assessed.

You have fifteen (15) days from the date of this letter to pay the fine amount as indicated in the enclosed invoice: H000607810. Failure to pay the fine amount will result in your account being forwarded to the State's collection program. You will also be prohibited from making changes to KCC authority, including but not limited to adding vehicles, name changes or renewal of authority, until the fine has been paid.

Direct inquires to: Kansas Corporation Commission (785) 271-3145

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KANSAS CORPORATION COMMISSION



Kansas Corporation Commission
Transportation Division
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027
(785) 271-3145
FEIN: 48-1124839

INVOICE - PAST DUE

AFFORDABLE MOVERS LLC
6921 E 111TH #9842
KANSAS CITY, MO 64134

Invoice Date: October 1, 2024
Invoice Number: H000607810
Due Date: October 31, 2024

Power Unit Identification at Time of Inspection:

Unit #	Unit Make	Unit License	VIN	License Number	Company ID
1	FORD			3759	107

Unit	Violation	Violation Description	Penalty
1	392.9A2	Failing to secure vehicle equipment	150.00
Total Due:			\$150.00

PLEASE REMIT IMMEDIATELY TO:

Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
Email: Transportation@KCC.KS.GOV
Fax: (785) 271-3124

Failure to submit payment within fifteen (15) days, from the date of the Second Notice of Violation will result in your account being forwarded to the State's collection program.

Payment options: check, money order or credit card

Circle the type of credit card: Visa, MasterCard, Discover or American Express

Card Holder Name _____

Credit card number _____ Expires: ____ / ____

From: Affordable Movers <affordablemoverskc@gmail.com>
Sent: Monday, November 11, 2024 7:14 AM
To: KHP Truck Inspection <KHP.TruckInspection@KS.GOV>
Subject: Kshp20082285

EXTERNAL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

My driver in a light duty rollback tow truck had a random inspection at weigh station. During the inspection the officer noticed he had a spare tire on bed in front of a vehicle. At the time of inspection he informed driver if he secured it he would just give him a warning. Well before end of inspection the driver put the tire inside vehicle being towed. Officer confirmed before he left the tire was addressed.

Please dismiss this citation.

Raymond Davis
816.695.7599

Travis Ware [KHP]

From: Travis Ware [KHP]
Sent: Friday, November 15, 2024 2:59 PM
To: affordablemoverskc@gmail.com
Subject: RE: Kshp20082285

Mr. Davis,

This is to inform you that your request for an internal review of a civil assessment penalty regarding an inspection that occurred on September 26th, 2024, have been **Denied**. All violations and civil penalties assessed are valid. The violations will remain on your carrier profile and Invoice # **H000607810** remains valid. Please see the invoice for information regarding the fines due and where to remit payment.

Your request for an internal review has been denied due to not requesting the internal review within the 30 days stated on the invoice.

The invoice states: You have thirty (30) days from the date of this letter to pay the fine amount as indicated in the enclosed invoice or thirty (30) days from the date of this letter to submit a challenge.

Affordable Movers LLC challenge request was dated on November 11th, 2024, and the first invoice was sent on October 1st, 2024.

If you are not satisfied with the outcome of your Internal Review by the Kansas Highway Patrol, you have the right to an administrative hearing with the Kansas Corporation Commission regarding the civil penalty assessed by our state. The hearing request and all further documentation must be received **within 15 days** from the date of this correspondence.

If you would like to appeal the violation received roadside, please avail yourself to the DataQ process at <http://dataqs.fmcsa.dot.gov>.

Please let me know the direction your company would like to take.

Travis Ware
Administrative Specialist
Troop I/MCSAP
Kansas Highway Patrol
Ph: 785-296-8157
Fax: 785-296-2858



Travis Ware [KHP]

From: Affordable Movers <affordablemoverskc@gmail.com>
Sent: Friday, November 15, 2024 3:28 PM
To: Travis Ware [KHP]
Subject: Re: Kshp20082285

EXTERNAL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Administrative hearing please. Is there a form I need to fill out?

On Fri, Nov 15, 2024, 2:59 PM Travis Ware [KHP] <Travis.Ware@ks.gov> wrote:

Mr. Davis,

This is to inform you that your request for an internal review of a civil assessment penalty regarding an inspection that occurred on September 26th, 2024, have been **Denied**. All violations and civil penalties assessed are valid. The violations will remain on your carrier profile and Invoice # **H000607810** remains valid. Please see the invoice for information regarding the fines due and where to remit payment.

Your request for an internal review has been denied due to not requesting the internal review within the 30 days stated on the invoice.

The invoice states: You have thirty (30) days from the date of this letter to pay the fine amount as indicated in the enclosed invoice or thirty (30) days from the date of this letter to submit a challenge.

Affordable Movers LLC challenge request was dated on November 11th, 2024, and the first invoice was sent on October 1st, 2024.

If you are not satisfied with the outcome of your Internal Review by the Kansas Highway Patrol, you have the right to an administrative hearing with the Kansas Corporation Commission regarding the civil penalty assessed by our state. The hearing request and all further documentation must be received **within 15 days** from the date of this correspondence.

If you would like to appeal the violation received roadside, please avail yourself to the DataQ process at <http://dataqs.fmcsa.dot.gov>.

Please let me know the direction your company would like to take.

Travis Ware

Administrative Specialist

Troop I/MCSAP

Kansas Highway Patrol

Ph: 785-296-8157

Fax: 785-296-2858



From: Affordable Movers <affordablemoverskc@gmail.com>

Sent: Monday, November 11, 2024 7:14 AM

To: KHP Truck Inspection <KHP.TruckInspection@KS.GOV>

Subject: Kshp20082285

EXTERNAL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

My driver in a light duty rollback tow truck had a random inspection at weigh station. During the inspection the officer noticed he had a spare tire on bed in front of a vehicle. At the time of inspection he informed driver if he secured it he would just give him a warning. Well before end of inspection the driver put the tire inside vehicle being towed. Officer confirmed before he left the tire was addressed.

Please dismiss this citation.

Raymond Davis

816.695.7599

CERTIFICATE OF SERVICE

25-GIMM-220-KHP

I, the undersigned, certify that a true copy of the attached Filing has been served to the following by means of electronic service on November 19, 2024.

Raymond Davies, JR., OWNER
Affordable Movers LLC
6921 E 11th #9842
Kansas City, MO 64134
affordablemoverskc@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