

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

In the Matter of the Investigation of )  
**Crystal's Livestock Express, LLC, of** )  
**Pittsburg, Kansas,** Regarding the Violation )  
of the Motor Carrier Safety Statutes, Rules )  
and Regulations and the Commission's ) Docket No. 19-TRAM-424-PEN  
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 Crystal's Livestock Express, LLC of Pittsburg, 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 807187.
3. On July 6, 2020, Transportation Staff filed a Motion to Suspend Carrier's Intrastate Motor Carrier Operations due to it not complying with Ordering clause B of the Penalty Order issued to it on April 30, 2019. Ordering clause B. states the carrier must submit to one follow-up safety compliance review within the next 18 months."
4. On July 9, 2020, the Commission issued an Order Suspending Motor Carrier Operations of Carrier.

5. Transportation Staff has advised that Carrier 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 Carrier's intrastate motor carrier authority operations.

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

Respectfully submitted,

Ahsan A. Latif  
Ahsan A. Latif, #24709  
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For Commission Staff

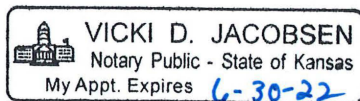
**VERIFICATION**

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.

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

SUBSCRIBED AND SWORN to before me this 10<sup>th</sup> day of August, 2020.



Vicki D. Jacobsen  
Notary Public

My Appointment Expires: June 30, 2022

## CERTIFICATE OF SERVICE

19-TRAM-424-PEN

I, the undersigned, certify that a true and correct copy of the above and foregoing Motion to Reinstate Intrastate Motor Carrier Operations was served via electronic service this 10th day of August, 2020, to the following:

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Vicki Jacobsen