THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Investigation of **Savannah**) **Traders LLC, of Overland Park, 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. 17-TRAM-173-PEN

MOTION TO REINSTATE INTRASTATE MOTOR CARRIER OPERATIONS

The Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively), by and through its counsel, files its motion requesting the Commission reinstate the Kansas motor carrier operations of Savannah Traders LLC of Overland Park, Kansas (Respondent). In support of its Motion, Staff states as follows:

1. Respondent is a motor carrier as defined in K.S.A. 2016 Supp. 66-1,108, 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 255147.

3. On January 10, 2017, the Commission issued an Order suspending Respondent's intrastate motor carrier operations other than such motor carrier operations expected from the Commission's regulation under K.S.A. 2016 Supp. 66-1,129, due to non-compliance with a Penalty Order issued in this docket on November 17, 2016. The Penalty Order also assessed Respondent a \$2,550 civil fine.

4. On February 3, 2017, Respondent submitted evidence to Staff of bringing its motor carrier operation into compliance with Kansas motor carrier safety statutes, rules and

regulations pursuant to the above-referenced Penalty Order. Respondent attended a Commission-sponsored safety seminar on January 10, 2017, and has provided Staff evidence of attendance. Further, Respondent paid the \$2,550 penalty assessment.

5. Therefore, Staff asks the Commission to find that Respondent has now complied with the requirements of the above-referenced Penalty Order.

6. Staff also asks the Commission to reinstate Respondent's Kansas motor carrier operations.

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

Respectfully submitted,

Ahsan A. Latit, #24709 Litigation Counsel Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, Kansas 66604 (785) 271-3118 (Telephone) (785) 271-3124 (Facsimile) <u>a.latif@kcc.ks.gov</u> (E-mail) For Commission Staff

VERIFICATION

17-TRAM-173-PEN

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 Intrastate Motor Carrier Operations, and attests that the statements therein are true and correct to the best of his knowledge, information and belief.

24709 et.

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

SUBSCRIBED AND SWORN to before me this 3^{d} day of February, 2017.

VICKI D. JACOBSEN Notary Public - State of Kansas My Appt. Expires 6-

D. Jacobsen Notary Public

My Appointment Expires: June 30, 2018

CERTIFICATE OF SERVICE

17-TRAM-173-PEN

I, the undersigned, certify that a true and correct copy of the above and foregoing Motion to Reinstate Intrastate Motor Carrier Operations was placed in the United States mail, postage prepaid, or hand-delivered this $\underline{l_0 + l_1}$ day of February, 2017, to the following:

AHSAN LATIF, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 Fax: 785-271-3354 a.latif@kcc.ks.gov CHARLES MULENGO, MANAGING MEMBER SAVANNAH TRADERS LLC 12904 W 108TH ST OVERLAND PARK, KS 66210-1108 Fax: 888-411-2820 trader@savannahtraders.com

Jacobso

Vicki Jacobser