

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

In the Matter of the Investigation of **Campbell Moving** )  
**and Storage Inc., of Lenexa, Kansas**, Regarding the )  
Violation(s) of the Motor Carrier Safety Statutes, Rules )  
and Regulations and the Commission's Authority to ) Docket No. 22-TRAM-169-PEN  
Impose Penalties, Sanctions and/or the Revocation of )  
Motor Carrier Authority. )  
)

**STAFF'S MOTION TO VACATE PENALTY ORDER**

The Staff of the State Corporation Commission of the State of Kansas (Staff), by and through its counsel, files its Motion to Vacate the Penalty Order issued to Campbell Moving and Storage Inc. (Carrier). In support of its Motion, Staff states as follows:

1. On October 13, 2021, Commission Staff UCR Manager Verna Jackson submitted a Report and Recommendation regarding Carrier's failure to pay its Unified Carrier Registration (UCR) fees for year 2020. As explained by Ms. Jackson, motor carriers must pay annual UCR fees in order to lawfully operate in interstate commerce.<sup>1</sup>

2. On October 21, 2021, the Commission issued a Penalty Order in this docket assessing a \$300 civil penalty against Carrier for failure to pay its 2020 UCR fees.

3. Staff after reviewing available records determined that Carrier paid its 2020 UCR fees and therefore determined the Penalty Order issued for not paying their 2020 UCR fees should be vacated.

4. Therefore, based on the payment of the 2020 UCR fees, Staff requests the Commission vacate the Penalty Order issued to Carrier on October 21, 2021.

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<sup>1</sup> Staff's R&R, p. 1 (Oct. 13, 2021).

**WHEREFORE**, for the reasons stated above, Staff respectfully requests the Commission vacate the Penalty Order issued to Campbell Moving and Storage Inc. in this docket on October 21, 2021.

Respectfully submitted,

*/s/ Ahsan Latif*

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Ahsan Latif, S. Ct. #24709  
Litigation Counsel  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, Kansas 66604  
(785) 271-3118 (Telephone)  
(785) 271-3124 (Facsimile)  
[a.latif@kcc.ks.gov](mailto:a.latif@kcc.ks.gov) (E-mail)

For Commission Staff

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that a true copy of the attached motion has been served to the following by means of first class mail on November 16, 2021:

AHSAN LATIF,  
LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3354  
[a.latif@kcc.ks.gov](mailto:a.latif@kcc.ks.gov)

CAMPBELL MOVING AND STORAGE INC  
8024 BELL RD  
LENEXA, KS 66219

/s/Abigail Emery