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)	Docket No. 19-TRAM-429-PEN
Commission's 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 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.A.R. 82-4-1, 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 2551471.
- 3. On 1July 30, 2019, the Commission issued an Order suspending Respondent's intrastate motor carrier operations other than such motor carrier operations excepted from the Commission's regulation under K.S.A. 2018 Supp. 66-1,129, due to non-compliance with a Penalty Order issued in this docket on May 2, 2019. The Penalty Order also assessed Respondent a \$3,350 civil fine.

- 4. On September 12, 2019, Respondent and Staff entered into a Stipulated Settlement Agreement wherein the civil fine of \$3,350 was reduced to \$850, and Respondent is to pay the \$850 within 30 days of the Order Approving Stipulated Settlement Agreement.
- 5. Therefore, Staff 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. Latif, #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 (E-mail)

For Commission Staff

VERIFICATION

19-TRAM-429-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.

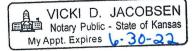
Ahsan A. Latif, S. Ct. # 24709

Litigation Counsel

The State Corporation Commission

of the State of Kansas

SUBSCRIBED AND SWORN to before me this 12th day of September, 2019.



Notary Public

My Appointment Expires: June 30, 2022

CERTIFICATE OF SERVICE

19-TRAM-429-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 12th day of September, 2019, to the following:

AHSAN LATIF, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 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

Vicki Jacobsen