



transportation division to inspect and examine any and all books, accounts, papers, records, property and memoranda pertinent to its regulation of motor carriers.”

4. Carrier is a motor carrier as defined in 49 C.F.R. 390.5, as adopted by K.A.R. 82-4-3f, in that it operates commercial motor vehicle(s) in intrastate commerce.

5. Carrier is registered as a motor carrier with the U.S. Department of Transportation (USDOT) and operates under USDOT number 3483962. Carrier’s USDOT Profile was updated on July 11, 2023 by the filing of an MCS-150 file that lists its current physical and mailing address, phone number and email address. A copy of Carrier’s MCS-150 form is attached hereto as Attachment “A” and is hereby incorporated by reference.

6. On August 12, 2024, a Staff Special Investigator met with the owner of Carrier at its physical address to facilitate a safety compliance investigation on its operations as a motor carrier. Carrier was unable to provide necessary documents to evidence its safety practices. The investigator gave Carrier a deadline of August 16, 2024 to provide the necessary documents and followed up by email on August 14, 2024 and by phone and text on August 20, 2024. An affidavit signed by the SI is attached hereto as Attachment “B” and is hereby incorporated by reference.

7. Ahsan Latif, Litigation Counsel, wrote and mailed Carrier a letter on August 27, 2024, informing Carrier that should it continue to resist by failing to respond, the Commission may suspend its motor carrier operations, revoke or amend certificates, and/or initiate sanctions or fines against Carrier. The Carrier was given ten (10) days from the date of the letter to respond and contact the special investigator. A copy of the letter is attached hereto as Attachment “C” and is hereby incorporated by reference.

8. As of September 16, 2024, the Special Investigator and Litigation Counsel have not been contacted by Carrier to complete the safety compliance investigation or otherwise.

9. Staff asks that the Commission find Carrier received sufficient notice of the need facilitate a safety compliance review, including written notice by Litigation Counsel's August 27, 2024 letter.

10. Staff asks that the Commission find Carrier failed to respond to his attempts to contact carrier.

11. Based on the presented facts, Staff requests the Commission issue an order suspending Carrier's intrastate motor carrier authority operations until such time as Carrier contacts the Special Investigator to cooperate with Staff and permit the safety compliance review, at which time Staff will recommend the Commission issue an order of reinstatement of intrastate motor carrier operations.

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

Respectfully submitted,

*/s/ Ahsan Latif*

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

# **ATTACHMENT “A”**



## **ATTACHMENT “B”**

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

In the Matter of the Investigation of **Find a Deal** )  
**LLC d/b/a Event Bus Company, of Kansas** )  
**City, Kansas,** Regarding the Violation of the ) Docket No. 25-TRAM-154-PEN  
Motor Carrier Safety Statutes, Rules and )  
Regulations and the Commission's Authority to )  
Impose Penalties, Sanctions and/or the )  
Revocation of Motor Carrier Authority. )

**AFFIDAVIT OF MATT ADAMS**

I, Matt Adams, affiant, of lawful age, first being duly sworn upon oath, depose and say the following:

1. I have personal knowledge of the facts stated herein and they are all true and correct.
2. I am a Special Investigator employed by the Kansas Corporation Commission's Transportation Division.
3. I have been assigned to complete a compliance investigation on Find a Deal LLC d/b/a Event Bus Company (Event Bus Company or Carrier).
4. On 8/12/2024, I met with Kongwenebime Moffor, Owner of Event Bus Company at Carrier's Place of Business, 2107 W 46<sup>th</sup> Ave, Kansas City, Kansas.
5. At that time I requested further documentation from Mr. Moffor, giving the Carrier a deadline of 8/16/2024 to provide the information.
6. In effort to complete the compliance investigation, I have attempted contact of the Carrier using the contact information provided on its MCS-150 Form, filed by the Carrier on July 11, 2023.
5. Carrier has failed to respond to my requests for the remaining documentation.
7. I emailed the Carrier at its listed address, [kowenmoffor@gmail.com](mailto:kowenmoffor@gmail.com), on 8/14/2024. I received no response.

6. I called and texted the Carrier at its listed phone number, (913) 952-5666, on 8/20/2024. I received no response.

8. Despite these multiple attempts at contact, Carrier refuses to provide the remaining documentation.

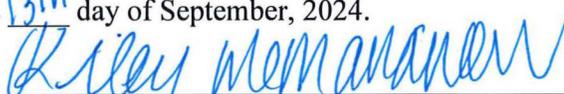
9. I have read the above information and swear under penalty of perjury, that the information and records are true, correct and complete to the best of my knowledge.

FURTHER, Affiant sayeth not.

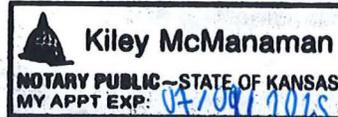


\_\_\_\_\_  
Matt Adams

Subscribed and sworn to before me this 13<sup>th</sup> day of September, 2024.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 07/09/2025



# **ATTACHMENT “C”**

1500 SW Arrowhead Road  
Topeka, KS 66604-4027



Phone: 785-271-3100  
Fax: 785-271-3354  
<http://kcc.ks.gov/>

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

Laura Kelly, Governor

August 27, 2024

Kongwenebime Moffor, Owner  
Find a Deal LLC d/b/a Event Bus Company a/k/a Elite Fleet  
2107 W 46<sup>th</sup> Ave  
Kansas City, Kansas 66103-3250

Re: Compliance Investigation

Dear Kongwenebime Moffor:

The Kansas Corporation Commission is given full power, authority and jurisdiction to supervise and control motor carriers - as defined in the Kansas statutes - doing business or procuring business in Kansas, and may do all things necessary and convenient for the exercise of such power, authority and jurisdiction.

From time to time, the commission is required to carefully examine and inspect the condition of each motor carrier, its equipment, the manner of its conduct and its management with reference to the public safety and convenience. Further, the Commission has the authority to investigate an entity under the Commission's jurisdiction and order a hearing when the Commission believes the entity is in violation of the law or any order of the Commission.

Deliberate avoidance of a Commission-sponsored safety compliance review is a violation of the above-stated law and authority. Find a Deal LLC d/b/a Event Bus Company a/k/a Elite Fleet is considered a motor carrier that is subject to the Commission's jurisdiction, and therefore, is required by law to submit to Commission compliance reviews.

Commission Special Investigator (SI) Matt Adams has made several attempts to facilitate a compliance review with you, to no avail. This letter therefore serves to notify you that should you continue to resist by failing to contact SI Adams **within ten days of the date of this letter** the Commission may suspend your motor carrier operations, revoke or amend certificates, and/or initiate sanctions or fines against you.

Thank you for your cooperation. If you have any further questions, you may contact SI Matt Adams at (785) 414-0625.

Sincerely,

*/s/ Ahsan A. Latif*

Ahsan A. Latif  
Litigation Counsel

**CERTIFICATE OF SERVICE**

25-TRAM-154-PEN

I, the undersigned, certify that a true copy of the attached Motion has been served to the following by means of electronic service on September 17, 2024.

AHSAN LATIF, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
ahsan.latif@ks.gov

Kongwenebime Moffor, OWNER  
Find A Deal LLC  
D/B/A Event Bus Company  
2107 W 46th Ave  
Kansas City, KS 66103  
kowenmoffor@gmail.com

/S/ Kiley McManaman  
Kiley McManaman

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