BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Investigation of)	
Jonathan Kelly d/b/a It's Your Move)	
of Parsons, Kansas, Regarding the)	
Violation of the Motor Carrier Safety)	Docket No. 25-TRAM-246-PEN
Statutes, Rules and Regulations and the)	
Commission's Authority to Impose)	
Penalties, Sanctions and/or the Revocation)	
of Motor Carrier Authority.)	
of Parsons, 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))))))	Docket No. 25-TRAM-246-F

WITHDRAWAL OF MOTION TO SUSPEND INTRASTATE MOTOR CARRIER OPERATIONS

The Staff of the State Corporation Commission of the State of Kansas (Staff), by and through its counsel, files a withdrawal of its motion to suspend Jonathan Kelly d/b/a It's Your Move, Kansas (Carrier) from intrastate commercial motor carrier operations. In support of its Withdrawal, Staff states as follows:

- 1. On April 1, 2025, the Commission issued Carrier a Penalty Order that assessed a civil penalty of \$350 for violations of the Kansas Motor Carrier Safety Statutes, Rules and Regulations discovered during a compliance review conducted by a Staff Special Investigator on December 12, 2024.
- 2. Carrier was sent a collection letter on May 7, 2025, reminding it of the amount due and giving it 10 days from the date of the collection letter to pay.
- 3. As of June 10, 2025, Commission records indicated that Carrier had not complied with the collection letter or the requirements of the Penalty Order.
- 4. On June 11 2025, Staff filed its Motion to Suspend Intrastate Motor Carrier Operations.
 - 5. On June 16, 2025, the Carrier paid its outstanding civil penalty.

6. Carrier's actions obviate the need to suspend the Carrier's intrastate motor carrier operations. Therefore, Staff withdraws its motion.

WHEREFORE, for the reasons stated above, Staff respectfully withdraws its Motion to Suspend Intrastate Motor Carrier Operations.

Respectfully submitted,

Isl Ahsan A. Latif

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 (E-mail)

For Commission Staff

CERTIFICATE OF SERVICE

25-TRAM-246-PEN

I, the undersigned, certify that a true copy of the attached Motion has been served to the following by means of first class mail and electronic service on June 16, 2025.

MADISEN HANE, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 madisen.hane@ks.gov JONATHAN KELLY, OWNER JONATHAN KELLY D/B/A IT'S YOUR MOVE 1820 FELIX AVE PARSONS, KS 67357-2930 itsyourmovejon@gmail.com

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

/S/ Kiley McManaman

Kiley McManaman