

**UNITED STATES DEPARTMENT OF TRANSPORTATION
FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION**

**PRUDENTIAL CARRIERS, INC.
USDOT NO. 2418188**

)
) **Order No.:**GA-2015-5001-IMH
)
) **Service**
) **Date:** 10/5/2015
)
) **Time:** 3:13pm
)

**IMMINENT HAZARD
OPERATIONS OUT-OF-SERVICE ORDER**

This is an Imminent Hazard Operations Out-of-Service Order ("Order") issued by the Secretary of Transportation pursuant to 49 U.S.C. § 521(b)(5)(A), 49 U.S.C. § 13905(f), 49 U.S.C. § 31144(c)(1) and (5), 49 U.S.C. § 31133(a)(10) and 49 U.S.C. § 49 U.S.C. § 31134, and 49 C.F.R. § 386.72(b)(1), and pursuant to a delegation of authority to the Field Administrator, Southern Service Center, Federal Motor Carrier Safety Administration ("FMCSA"), United States Department of Transportation ("USDOT"), Atlanta, Georgia. This Order applies to Prudential Carriers, Inc. (USDOT No. 2418188), a motor carrier, and its officers, agents, and employees (hereinafter collectively referred to as "you," "your," "it," and/or Prudential"), and to all commercial motor vehicles owned or operated by or on behalf of Prudential, including those commercial motor vehicles identified in Appendix A attached hereto.

The Secretary and the FMCSA find Prudential's operations and continued operation of any commercial motor vehicle (hereinafter referred to as "commercial motor vehicles," and/or "vehicles") in the United States constitute an imminent hazard. This finding means that based upon Prudential's present state of unacceptable safety compliance, its operation of any commercial motor vehicle poses an imminent hazard to public safety.

EFFECTIVE IMMEDIATELY PRUDENTIAL MUST
CEASE ALL COMMERCIAL MOTOR VEHICLE OPERATIONS
INCLUDING ALL INTERSTATE AND INTRASTATE TRANSPORTATION.

Commercial motor vehicles and drivers now in interstate or intrastate commerce may proceed to their next immediate destination. *See* 49 C.F.R. § 386.72(b)(4) and (5). Prudential may not load or transport any additional freight or property while this order is in effect.

PRUDENTIAL MAY NOT LOAD OR TRANSPORT ANY ADDITIONAL
CARGO OR OPERATE ANY COMMERCIAL MOTOR VEHICLE IN INTERSTATE
OR INTRASTATE COMMERCE WHILE THIS ORDER IS IN EFFECT.

“Operate” or “Operating” includes without limitation all interstate and intrastate transportation by drivers from all dispatching locations or terminals. Prudential’s commercial motor vehicles may not be operated in interstate or intrastate commerce by any other motor carrier or any driver, even without freight. Any movement of Prudential’s commercial motor vehicles, including its trailers, to any storage, repair, or other location for the purposes of repair, sale, storage, or final destination must be accomplished only by towing, such that the commercial motor vehicle itself is not driven or operated. Prudential’s commercial motor vehicles may be moved, including by tow, only upon the written approval of the Field Administrator for FMCSA’s Southern Service Center.

Within eight (8) hours of receipt of this Order, Prudential must submit to the Field Administrator in writing by facsimile or electronic mail (email) the location of each commercial motor vehicle under its control. The submission must be sent to:

Darrell Ruban
Field Administrator, Southern Service Center
404-327-7359 (facsimile)
Email: deborah.stanziano@dot.gov (Attorney for Field Administrator)

I. JURISDICTION

Prudential is a motor carrier engaged in interstate commerce using commercial motor vehicles and is therefore subject to the Federal Motor Carrier Safety Regulations ("FMCSRs"), 49 C.F.R. Parts 350-399, and the alcohol and controlled substances regulations at 49 C.F.R. Part 40, as well as the Orders of the USDOT and FMCSA. *See* 49 U.S.C. §§ 506, 507, 13501, 31133, 31136, and 31144. Prudential is required to comply, and to ensure its drivers comply, with the FMCSRs and Orders of the USDOT and FMCSA. 49 C.F.R. § 390.11.

This Order has the force and effect of any other Order issued by FMCSA and is binding upon Prudential as well as any and all of its officers, members, directors, successors, assigns and closely affiliated companies. This Order applies to all motor carrier operations and all vehicles owned, leased, rented or otherwise operated by Prudential.

II. BASIS FOR ORDER

The basis for determining that Prudential's motor carrier operations pose an imminent hazard to the public is serious ongoing widespread noncompliance with Federal safety regulations and statutes, including the FMCSRs.

Prudential does not have a systematic vehicle inspection, repair, and maintenance program in place to prevent the operation of unsafe commercial motor vehicles. Prudential's lack of safety management controls and violations of the FMCSRs has resulted in the occurrence of several accidents during the past nine months. Prudential is also not requiring its drivers to prepare driver vehicle inspection reports which identify known and cited violations from roadside inspections so that the vehicles may properly be repaired and has falsified two annual inspection forms to conceal its failure to conduct the required inspections.

Prudential does not have safety management practices in place to ensure its drivers

comply with the maximum hours of service limitations and are preparing and submitting accurate records of duty status. FMCSA investigators' review of drivers' records of duty status revealed a falsification rate of about 30% and drivers' falsification of records of duty status to conceal hours of service violations for trips dispatched which cannot be completed within hours of service limitations.

Furthermore, Prudential does not follow FMCSA driver qualification requirements to ensure that its drivers are qualified to operate its commercial motor vehicles. Nor does Prudential comply with FMCSA mandated random alcohol or controlled substance testing requirements and it is not post-accident testing its drivers.

Individually and cumulatively, these violations and conditions of operation substantially increase the likelihood of serious injury or death to Prudential's drivers and the motoring public.

III. BACKGROUND

On or about May 27, 2015, FMCSA initiated a compliance review of Prudential due to the carrier's recent involvement in several crashes, one of which the carrier knowingly instructed the driver to continue driving a vehicle that was leaking oil. The compliance review resulted in a proposed Unsatisfactory rating, and moreover, FMCSA's investigation uncovered widespread regulatory violations demonstrating Prudential's repeated and egregious non-compliance with the FMCSRs and a management philosophy indifferent to motor carrier safety.

Prudential's operations are reckless, with almost nonexistent safety management oversight of its vehicles, drivers, and operations. Prudential currently conducts operations out of the house of its President, Sitha Svay, employing 28 drivers, with 21 of the drivers being

owner-operators, and leasing 27 truck tractors and 14 trailers. Prudential also owns 4 truck tractors and 13 trailers.

Prior to commencement of the compliance review, Prudential requested a one week extension in order to gather and organize its documents, and indeed, the President, Sitha Svay, admitted that “he knew his stuff was in disarray.” After the start of the compliance review, Prudential still could not provide FMCSA safety investigators with a complete and accurate list of the drivers it employed during the past year or the hire and termination dates of employed drivers. Nor could it identify the commercial motor vehicles it operated or used during the past year. During the opening interview, Prudential told FMCSA investigators that it does not transport hazardous materials. However, during the investigation, FMCSA investigators discovered that Prudential had in fact transported hazardous materials, evidencing Prudential’s lack of safety and management controls over its operations.

Prudential does not have any safety management program in place for oversight of its motor carrier operations. Until the day of the compliance review, the carrier did not have a designated employee responsible for safety. Once the compliance review started, Prudential appointed a particular employee to be responsible for safety and that employee was present during the compliance review. In fact, the employee told safety investigators that “I think I need to quit because we are going to kill somebody.”

Prudential does not have a systematic vehicle inspection, repair, and maintenance program in place for its leased vehicles and instead places the responsibility for proper maintenance on the operators of the vehicles. Prudential also does not have a systematic vehicle inspection, repair, and maintenance program in place for the vehicles it owns. Prudential’s lack of safety management controls over its vehicles and violations of the FMCSRs has resulted in

the occurrence of several accidents during the past nine months. On May 12, 2015, a Prudential driver delivered nine pallets of canola oil to a Macon, Georgia business but was refused delivery because a container had broken and was leaking canola oil. Subsequently, the driver contacted management and was instructed to drive the leaking vehicle back to the Atlanta area. As the driver drove to Atlanta, the vehicle spilled oil on the roads and on I-75 causing extremely slick and hazardous road conditions for the traveling public. Four separate vehicle accidents occurred because of the slick and hazardous road conditions, and even police vehicles dispatched to the accidents slid over the roads. Enforcement officers searched for the leaking vehicle and finally stopped Prudential's driver at mile marker 193 on I-75. There, enforcement officers found nine pallets of canola oil in the trailer with one pallet completely ruptured and leaking from the trailer seams front to back. The driver was arrested for knowingly operating a commercial motor vehicle with an unsecure load. In another accident occurring on October 21, 2014, a Prudential driver pulled over on the right shoulder of I-20 in Douglas County, Georgia because of overheated brakes, an indicator of a failing brake system. While waiting for the brakes to cool, the driver fell asleep and another vehicle collided with the Prudential vehicle. The Prudential driver was cited for parking in a prohibited place.

Over the past year, Prudential has had 38 roadside inspections with 95 discovered maintenance violations. Enforcement officers have conducted 11 Level 1 inspections on Prudential's leased vehicles with 4 vehicles (36% of the inspections) being placed out-of-service for vehicle violations. The leased vehicles received a total of 55 violations for an average of 5 violations per inspection. In addition, Prudential drivers are not preparing driver vehicle inspection reports which identify known and cited violations from roadside inspections. Such reports are necessary to ensure proper maintenance of the vehicles. Prudential's

indifference to vehicle maintenance is further evidenced by its fraudulent entries on two annual inspection forms showing completion of the inspections on days when the vehicles were not even available for the claimed inspections because they were operating in interstate commerce.

Prudential does not have safety management practices in place to ensure its drivers comply with the maximum hours of service limitations and are preparing and submitting accurate records of duty status. Prior to dispatching drivers, Prudential does not review drivers' availability of hours of service to ensure its drivers will not be operating in violation of the hours of service regulations. Prudential also does not monitor drivers' records of duty status ("RODS") to confirm that drivers are not falsifying their RODS or driving over allowable hours. FMCSA investigators' review of Prudential drivers' RODS revealed a falsification rate of about 30% and drivers' falsification of records of duty status to conceal hours of service violations for trips dispatched which cannot be completed within hours of service limitations.

. FMCSA investigators review of driver dispatch records revealed trips which could not be located on the driver's RODs for the same time period. FMCSA investigators' review of drivers' RODS and time stamped fuel reports uncovered rampant RODS falsification ranging from 350 miles to more than 1000 miles variance. RODS falsification showed drivers consistently recording driving in Georgia when in fact the drivers were in El Paso, Texas, more than 1,000 miles away from the ROD recorded location. Drivers' RODS showed drivers resting during a logged 34 hour restart in Atlanta when in fact the drivers were completing trips to and from Texas for trip totals of more than 1,000 miles. Drivers' failure to take qualifying 10 hour and 34 hour restart periods consistently place the drivers over the 11 hour, 14 hour, and 70 hour rule limitations. The hours of service regulations establish the standards for the safe operation of commercial motor vehicles, and are intended to guard against the cumulative effects of

fatigue which accompany prolonged periods of on-duty and driving time. One particular false ROD discovered by FCSA investigators involved a carrier crash in which a driver rear-ended 4 other vehicles during a period in which the driver concealed hours worked under the 70 hour rule limitation by driving during a 34 hour restart period two days before the crash. If logged correctly, the driver would have been at his 72 hour of the work period at the time of the crash. By permitting its drivers to exceed maximum hour limits, Prudential is allowing its drivers to operate commercial motor vehicles at a time when they may be fatigued.

Prudential also does not follow FMCSA driver qualification requirements to ensure that its drivers are qualified to operate its commercial motor vehicles. Prudential does not review the employment application and paperwork submitted by the driver but instead simply places it in a file without review. Prudential's failure to review Motor Vehicle Records ("MVRs") from States issuing the drivers' Commercial Driver's Licenses during the hiring process and annual reviews has resulted in Prudential being cited for using 4 drivers to operate commercial motor vehicles without a commercial driver's license during the past year. Nor does Prudential comply with FMCSA mandated random alcohol or controlled substance testing requirements to ensure that its drivers are able to safely operate its commercial motor vehicles, including failing to test its drivers after involvement in reportable accidents.

In sum, Prudential's continued and blatant disregard for the FMCSRs substantially increases the likelihood of serious injury or death, and its operations pose an imminently hazardous and potentially deadly risk for its drivers and the motoring public if not discontinued immediately.

IV. REVOCATION OF OPERATING AUTHORITY REGISTRATION AND SUSPENSION OF USDOT NUMBER REGISTRATION

49 U.S.C. § 13905(f)(2) requires FMCSA to revoke the operating authority registration

of a motor carrier if the FMCSA finds that such carrier has been conducting unsafe operations which are an imminent hazard to public health or property. Additionally, pursuant to 49 U.S.C. § 31134(c)(1), the Secretary is required to suspend the USDOT number registration of a motor carrier if the Secretary determines that the motor carrier's operating authority registration is subject to revocation as a result of such imminent hazard finding. Accordingly, pursuant to 49 U.S.C. § 13905(f)(2), Prudential's operating authority is revoked, and pursuant to 49 U.S.C. § 31134(c)(1), Prudential's USDOT number registration is suspended.

V. REMEDIAL ACTION

To eliminate this imminent hazard, and before Prudential will be permitted to resume operations placed out-of-service by this Order, Prudential must take specific steps to ensure and demonstrate compliance with the FMCSRs, including the following:

1. Prudential must establish a DOT controlled substance and alcohol testing program in compliance with 49 C.F.R. Parts 40 (Procedures for Transportation Workplace Drug and Alcohol Testing Programs) and 382 (Controlled Substances and Alcohol Use and Testing) and provide evidence of this program to the Southern Service Center Field Administrator. Prudential must use only those laboratories certified by the U.S. Department of Health and Human Services' Substance Abuse and Mental Health Services Administration for the analysis of urine specimens. Prudential must implement a policy on the misuse of alcohol and controlled substances that conforms to 49 C.F.R. § 382.601(b). Prudential must ensure that driver supervisors undergo at least 60 minutes of training on alcohol misuse as well as an additional 60 minutes of training on controlled substance use that conforms to 49 C.F.R. § 382.603.

2. Prudential must ensure that each driver selected for random controlled substances or alcohol testing has an equal chance of being selected each time selections are made.

Prudential must ensure that it has received a negative pre-employment controlled substances test for each driver before using that driver to perform safety-sensitive functions. Prudential must establish policies and procedures to ensure that it does not dispatch a driver who has tested positive for controlled substances or alcohol until that driver has completed the return-to-duty process in 49 C.F.R. Part 40.

3. Prudential must ensure that it maintains driver qualification files, as required by 49 C.F.R. Part 391. Prudential must ensure that every driver it uses has completed and furnished an employment application. Prudential must investigate each driver's background within 30 days of employment, and must maintain a copy of the response from each State agency in the driver's qualification file. Prudential must ensure that it obtains from each driver an annual list of traffic violations and an annual Motor Vehicle Record, and that it performs an annual review on each driver's driving record. Prudential must ensure that it performs a three-year previous employment check on its drivers prior to their operating a commercial motor vehicle, in accordance with 49 C.F.R. § 391.23. Prudential must ensure each driver possesses a DOT medical examiner's certificate as well as ensure that a copy of each driver's medical examiner's certificate is maintained in the driver's qualification file.

4. Prudential must take aggressive and progressive steps to control drivers' hours of service.

5. Prudential must implement a dispatch system that ensures that no driver will be dispatched on any trip unless the driver has the necessary available hours of service to complete the trip in accordance with 49 C.F.R. Part 395.

6. Prudential must ensure that each of its drivers records his or her duty status for each 24-hour period in accordance with 49 C.F.R. § 395.8. Prudential must ensure that each of

its drivers complies with the hours of service rules in 49 C.F.R. § 395.5. Prudential must maintain each record of duty status for a minimum of six months in accordance with 49 C.F.R. § 395.8.

7. Prudential must implement a system to ensure that all drivers accurately complete their records of duty status in the form and manner required in 49 C.F.R. Part 395. Prudential must ensure that its drivers accurately complete their daily records of duty status and that they submit these records to Prudential within 13 days of their completion. Prudential must maintain drivers' records of duty status and demonstrate a system showing that the company can and will maintain all supporting documents. Further, Prudential must ensure that all records of duty status are accurate by using all means available to Prudential and by comparing each record with all supporting documentation.

8. Prudential must ensure that all drivers are adequately trained in the requirements of the FMCSRs and that they are able to conduct motor carrier operations consistent with those regulations.

9. Prudential must submit to the Field Administrator a plan detailing how it will (i) train all drivers used on compliance with the HOS regulations, (ii) monitor the compliance of all drivers with the HOS regulations, and (iii) ensure that all drivers are dispatched in such a way that scheduled routes may be completed within the maximum driving and on-duty hours, as provided in 49 C.F.R. § 395.5.

10. Prudential must establish safety management controls and procedures that ensure that each and every commercial motor vehicle it operates is systematically and properly inspected, maintained and repaired as required by 49 C.F.R. Part 396, and that documentation of inspections, maintenance and repair are obtained and maintained as required.

11. Prudential must demonstrate that it has an effective commercial motor vehicle maintenance program in place to inspect, maintain, and repairs its fleet and ensure compliance with the FMCSRs. Prudential must ensure and demonstrate that vehicle maintenance and safety is a company priority and must ensure and demonstrate that inspection records are accurately completed.

12. Prudential must ensure and demonstrate that its vehicles are in a safe operating condition and are in full compliance with 49 C.F.R. Part 393 (Parts and Accessories Necessary for Safe Operations) and Part 396 (Vehicle Maintenance).

13. Prudential must require its drivers to prepare Driver Vehicle Inspection Reports when and as required, implement a procedure so that its drivers can report safety defects and/or deficiencies, and establish and abide by procedures to ensure that reported safety defects and/or deficiencies are repaired immediately before the commercial motor vehicle is operated again. Prudential must train its drivers and ensure all drivers understand the meaning of a roadside out-of-service order and comply with roadside out-of-service orders.

14. Prudential must establish safety management controls and procedures to ensure that defects and deficiencies discovered during inspections of its commercial motor vehicles are repaired prior to the vehicle being operated. Prudential must ensure that no commercial motor vehicle that fails, or has failed, a safety inspection is operated prior to necessary repairs being made and the vehicle passing an appropriate safety inspection.

15. Prudential must contact FMCSA's Georgia Division and arrange for inspection of each of its commercial motor vehicles by an FMCSA inspector or an inspector designated by FMCSA.

16. Prudential must comply with all Orders issued by FMCSA.

VI. RESCISSION OF ORDER

Prudential's motor carrier operations are subject to this Order unless and until the Order is rescinded in writing by FMCSA. Unless and until this Order is rescinded, and until such time as Prudential's has a valid and active USDOT number and operating authority registration, Prudential is prohibited from operating any commercial motor vehicle in interstate and/or intrastate commerce. This Order will not be rescinded until the Field Administrator for FMCSA's Southern Service Center has determined that the Remedial Action requirements specified in Paragraph V of this Order have been fully satisfied and acceptable documentation submitted.

Before this Order will be rescinded, Prudential must comply with the provisions of this Order, eliminate the problems constituting the imminent hazard that its operations pose, and adequately demonstrate to the Field Administrator for the Southern Service Center the actions taken to eliminate the safety problems. Prudential cannot avoid this Order by continuing operations under the name of another person or company.

Any sale, lease, or other agreements involving Prudential's commercial motor vehicles or motor carrier operations require three business days written notice to the Field Administrator. Any such action taken in anticipation of this Order must cease immediately.

Prior to rescission of this Order, Prudential will be required to:

1. Identify the cause for its noncompliance.
2. Develop a detailed Safety Management Plan of action that addresses each area of non-compliance, the steps it intends to take to overcome its non-compliance, and a time table for these steps.
3. Execute the Safety Management Plan and provide certification by all owners and officers.

Any request to rescind this Order and documentation demonstrating satisfaction of the

Remedial Action requirements must be directed to the Field Administrator, Southern Service Center, with a copy to the Division Administrator, Georgia Division, at the following addresses:

Field Administrator, Southern Service Center
Federal Motor Carrier Safety Administration
1800 Century Blvd., NE, Suite 1700
Atlanta, Georgia 30345

Division Administrator, Georgia Division
Federal Motor Carrier Safety Administration
1745 Phoenix Boulevard, Suite 380
Atlanta, Georgia 30349

Rescission of this Order does not constitute a reinstatement of Prudential's USDOT Number or operating authority registration. In order for Prudential to resume motor carrier operations transporting property in interstate or intrastate commerce, Prudential will be required to apply to reactivate its USDOT number registration, and if its operations require Federal operating authority, apply for new operating authority registration and demonstrate that it is fit and willing and able to comply with: 1) the statutory and regulatory registration requirements; 2) applicable safety regulations including the FMCSRs; 3) the commercial motor vehicle safety requirements of employers and employees set forth in 49 U.S.C. § 31135; 4) the safety fitness requirements set forth in 49 U.S.C. § 31144; and 5) minimum financial responsibility requirements established under 49 U.S.C. §§ 13906 and 31138.

VII. ENFORCEMENT OF ORDER

This Order, issued pursuant to 49 U.S.C. § 521(b)(5)(A), 49 U.S.C. § 13905(f), 49 U.S.C. § 31144(c)(1) and (5), § 31133, and § 31134 and 49 C.F.R. § 386.72(b)(1), is an Order of, and enforceable by, the Secretary. Violation of this Order may subject Prudential to civil penalties and also result in an action in the United States District Court for equitable relief and punitive damages. Prudential may be assessed civil penalties of up to \$25,000 for a violation of this

ORDER. (49 U.S.C. §§ 507, 521(b)(2)(F), and 521(b)(4) and 49 C.F.R. Part 386 App. A. § IV(g)). Prudential may also be assessed civil penalties up to \$10,000 for providing transportation requiring registration, including operating a commercial motor vehicle in interstate commerce, without operating authority registration and up to \$25,000 for operating a commercial motor vehicle in interstate commerce without USDOT number registration. *See* 49 U.S.C. §§ 14901, 14702-03, 507, 521(b)(2)(F) and 31134. Violations of this ORDER may also subject Prudential to criminal penalties, including a fine of up to \$25,000 and imprisonment for a term not to exceed one year. (49 U.S.C. §§ 521(b)(6)(A) and 526).

VII. PENALTIES FOR VIOLATIONS

Any motor carrier or driver that violates Federal requirements, including the FMCSRs, and/or permits its employee(s) to violate Federal requirements is subject to civil and/or criminal penalty provisions. Penalty provisions for violations of Federal statutes and regulations are separate and distinct from this Order. Penalties may be assessed for the violations of Federal requirements, including the FMCSRs and Orders of the FMCSA, previously discovered, discovered after the service of this Order, and/or discovered during subsequent investigations.

VIII. RIGHT TO REVIEW

You have the right to administrative review in accordance with 5 U.S.C. § 554 and 49 C.F.R. § 386.72(b)(4). If requested, administrative review must commence within ten days after the petition for review is filed and must be concluded as expeditiously as practicable but may run longer than ten days from the date of issuance of such Order or the filing of the petition for review. *See* 49 U.S.C. § 521(b)(5) and 49 C.F.R. § 386.72(b)(4). A request for review must be addressed to the Assistant Administrator, United States Department of Transportation, Federal Motor Carrier Safety Administration, and should be sent to the attention of Adjudications

Counsel by facsimile or electronic mail as follows:

By Fax:

Adjudications Counsel (MC-CCA)
(202) 366-3602

or electronic mail:

FMCSA.Adjudication@dot.gov

with a copy mailed or sent by commercial delivery service to the Assistant Administrator and

Adjudications Counsel at the following address:

Adjudications Counsel (MC-CCA)
Federal Motor Carrier Safety Administration
Office of Chief Counsel
1200 New Jersey Avenue, S.E.
Washington, DC 20590

A copy of any request for administrative review must also be sent to the Field Administrator by mail, email, and/or facsimile as follows:

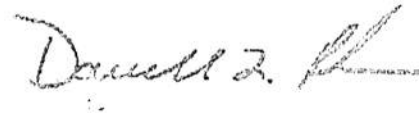
Field Administrator, Southern Service Center
Federal Motor Carrier Safety Administration
1800 Century Blvd., NE, Suite 1700
Atlanta, GA 30345
Fax: (404) 327-7359
Email: deborah.stanziano@dot.gov

The request must state the material facts at issue which you believe dispute or contradict the finding that Prudential's operations constitute an **"imminent hazard"** to the public.

A REQUEST FOR ADMINISTRATIVE REVIEW DOES NOT IN ANY WAY

DELAY YOUR DUTY TO COMPLY WITH THIS ORDER IMMEDIATELY. This Order is separate and independent from all other orders or actions that may be issued by FMCSA, and does not amend or modify any other such orders or actions. Any request for administrative review of this Order does not attach to or apply to any other order or action.

Date: June 5, 2015

A handwritten signature in dark ink, appearing to read "Darrell Z. Ruban". The signature is written in a cursive style with a large initial "D".

Darrell Ruban, Field Administrator
United States Department of Transportation
Federal Motor Carrier Safety Administration

ATTACHMENT A – LIST OF VEHICLES

VIN 1FUJBBAV37PW77137

VIN 1FUJBBAV97PW77174

VIN 4V4NC9TH15N394562

VIN 1FUJBBAV77LV91899