

**COMMONWEALTH OF KENTUCKY**  
**48<sup>TH</sup> JUDICIAL CIRCUIT**  
**FRANKLIN CIRCUIT COURT, DIV. \_\_\_\_**  
**CIVIL ACTION NO: \_\_\_\_\_**

*Electronically Filed*

**COMMONWEALTH OF KENTUCKY**  
***ex rel.* RUSSELL COLEMAN, ATTORNEY GENERAL**

**PLAINTIFF**

v.

**MARGARET'S MOVING INC.**  
**d/b/a MARGARET'S MOVERS INC.**  
**d/b/a MARGARETS MOVERS INC**  
**d/b/a MARGARET'S MOVING AND STORAGE**

SERVE VIA CERTIFIED MAIL:  
Stormie Weathers  
Registered Agent  
104 E Breckinridge Street  
Louisville, KY 40203

**MARGARET WEATHERS**

**DEFENDANTS**

SERVE VIA CERTIFIED MAIL:  
Margaret Weathers  
619 Cecil Ave.  
Louisville, KY 40211

**COMPLAINT**

Plaintiff, Commonwealth of Kentucky, by and through its Attorney General, Russell Coleman, brings this civil enforcement action against defendants Margaret's Moving Inc. d/b/a Margaret's Movers d/b/a Margaret's Moving and Storage and Margaret Weathers for engaging in unfair, false, misleading, or deceptive conduct in violation of the Kentucky Consumer Protection Act.

**Parties, Jurisdiction, and Venue**

1. Plaintiff, the Commonwealth of Kentucky *ex rel.* Russell Coleman, Attorney General, is responsible for enforcing the Kentucky Consumer Protection Act, KRS 367.110 *et seq.* (hereinafter “KCPA”). He is authorized by KRS 367.190 to bring this action in the name of the Commonwealth of Kentucky and has determined it to be in the public interest to do so.

2. Defendant, Margaret’s Moving Inc. d/b/a Margaret’s Movers and d/b/a Margaret’s Moving and Storage (collectively, “Margaret’s Movers”), is a Kentucky limited liability company with its principal place of business located at 104 E Breckinridge Street, Louisville, KY 40203.

3. Defendant Margaret Weathers is a co-owner of Margaret’s Movers and a resident of Jefferson County, Kentucky.

4. This Court has subject matter jurisdiction over the Commonwealth’s claims pursuant to KRS 23A.010 and KRS 367.190(1). The Commonwealth’s claims are in excess of any minimum dollar amount necessary to establish the jurisdiction of this Court.

5. This Court has personal jurisdiction over Margaret’s Movers because Margaret’s Movers is a limited liability company organized under Kentucky law. Margaret’s Movers has conducted and is conducting business in the Commonwealth.

6. Venue is proper in Franklin County pursuant to KRS 367.190(1) because Defendants’ methods, acts, and practices declared to be unlawful by KRS 367.170 were committed or are about to be committed in Franklin County.

**Facts**

7. Upon information and belief, Margaret Weathers and Arthur “Stormy” Weathers are the co-owners of Margaret’s Movers.

8. Margaret's Movers is a limited liability company organized under Kentucky law and doing business in Kentucky. Margaret's Movers' business includes residential and commercial moving and storage services. *See* Exhibit 1A – Margaret's Movers Website, margaretsmoving.com, landing page, last accessed August 7, 2025.

9. Margaret's Movers has operated a website, margaretsmoving.com, to advertise its services. The website provides that Margaret's Movers "offer[s] local moving service in Lexington, Indianapolis, Louisville, and the surrounding areas." *Id.* The website further states that the company provides "dependable, safe, honest" moving services and has done so for over 18 years. *Id.*

10. The website advertises that Margaret's Movers' moving crews have "years of experience and they are always fast, honest, and reliable employees." *See* Exhibit 1B – Margaret's Movers Website, margaretsmoving.com, "Moving Services" tab, last August 7, 2025. The website also alleges Margaret's Movers holds various certifications from various state and national organizations, including the American Moving and Storage Association, the Certified Moving Consultant (CMC), a Female Business Enterprise with the Louisville/Jefferson County Human Relations Commission, and a Certified Office and Industrial Consultant (COIC), and Greater Louisville Inc. (GLI). *See* Exhibit 1C - Margaret's Movers Website, margartesmoving.com "Our History" tab, last accessed August 7, 2025.

11. Through its margaretsmoving.com website, Margaret's Movers gives consumers and the public at large the false impression that it is legally authorized to perform moving services within the Commonwealth of Kentucky, i.e., intrastate moves, when it is not legally permitted to do so in Kentucky.

12. Under KRS 281.630(1), “[a] person shall not act as a motor carrier without first obtaining a certificate from the department.” The “department” is the Department of Vehicle Regulation. KRS 281.010(14).

13. A “motor carrier” is defined in relevant part as “any person in either a private or for-hire capacity who owns, controls, operates, manages, or leases, except persons leasing to authorized motor carriers, any motor vehicle for the transportation of passengers or property upon any highway...” KRS 281.010(34). The term “highway” means “all public roads, highways, streets, and ways in this state, whether within a municipality or outside of a municipality.” KRS 281.010(24).

14. One of the types of certificates issued by the Department of Vehicle Regulation is a household goods certificate. KRS 281.630(3)(a)(5).

15. A “household goods certificate” is a “certificate granting authority for the operation of one (1) or more household goods vehicles.” KRS 281.010(27).

16. A motor carrier seeking to obtain a household goods certificate from the Department of Vehicle Regulation must apply for a certificate and fulfill certain requirements, including, but not limited to:

- a. filing a motor carrier vehicle license application for each motor carrier vehicle;
- b. obtaining and retaining for a period of at least three years a nationwide criminal background check of each employee operating a passenger vehicle or household goods vehicle or entering a private residence or storage facility for the purpose of providing or facilitating the transportation of household goods;
- c. filing with the Department of Vehicle Regulation an approved bond or insurance policy; and
- d. filing a current tariff.



*See* KRS 281.630(3)(c).

17. Each certificate issued by the Department of Vehicle Regulation must be renewed annually. KRS 281.630(4)(a). A certificate that is not renewed within one calendar year after the date for its renewal is null and void. KRS 281.630(4)(b).

18. Despite operating as motor carrier in the Commonwealth, Margaret's Movers currently does not have a household goods certificate issued by the Department of Vehicle Regulation, and it has not possessed a valid household goods certificate since 2015. *See* Exhibit 2 - Affidavit of Bill Deboard.

19. Over the course of several years, the Attorney General has received consumer complaints against Margaret's Movers concerning the company's failure to properly perform moving and storage services. In some instances, consumers who entrusted Margaret's Movers to move and store their furniture and home goods reported missing pieces of furniture or items that they later found to have been allegedly stolen and converted by Margaret's Movers. *See* Exhibit 3- Consumer Complaint Forms and Correspondence.

20. The Attorney General issued a Subpoena and Civil Investigative Demand ("CID") to Margaret's Movers pursuant to KRS 367.240 and 367.250 on October 27, 2022, after receiving consumer complaints regarding the Defendant. *See* Exhibit 4 – Civil Investigative Demand. The CID was served on November 2, 2022. After multiple extensions, the Office received an unsigned, partial response to the CID on January 9, 2023, before receiving a signed and notarized (but still incomplete) response on February 3, 2023. Margaret's Movers was represented by counsel at this time. *See* Exhibit 5- CID response.

21. On February 24, 2023, the Office sent a Deficiency Letter to Margaret's Movers concerning its response to the CID with a deadline for the supplemental response by March 10, 2023. *See* Exhibit 6- Deficiency Letter. After multiple emails and call with the company's

attorney, the Office never received a response to the Deficiency Letter. The Deficiency Letter identified that Margaret's Movers failed to submit the most basic information, including agreements between Margaret's Movers and its customers and all its known storage locations. As of the day of this filing, the Office has not received a response to the Deficiency Letter.

22. The Kentucky Transpiration Cabinet's Department of Vehicle Regulation keeps an updated list of all motor carriers that have a household goods certificate. *See* Exhibit 2. Margaret's Movers does not appear on this list, which was updated as of June 1, 2025. *See* Exhibit 7- Department of Vehicle Regulation List.

23. Margaret's Movers is not properly registered and has not been properly registered with KYTC since 2015. *See* Exhibit 2. Margaret Weathers submitted Margaret's Movers' last household goods renewal certificate on or around January 2015. *See* Exhibit 8 - Margaret's Movers Intrastate Household Good Certificate Renewal.

### **Violations of Law**

#### **Count I**

#### **The Kentucky Consumer Protection Act -KRS 367.170**

24. The Commonwealth repeats and realleges each and every allegation and statement above as though fully set forth herein and incorporates the same by reference.

25. Pursuant to KRS 367.170, "[u]nfair, false, misleading or deceptive acts or practices in the conduct of any trade or commerce are declared unlawful."

26. Pursuant to KRS 367.190, "[w]henver the Attorney General has reason to believe that any person is using, has used, or is about to use any method, act or practice declared by KRS 367.170 to be unlawful, and that proceedings would be in the public interest, he may immediately move in the name of the Commonwealth in a Circuit Court for a restraining order or temporary or permanent injunction to prohibit the use of such method, act or practice."

27. Pursuant to KRS 367.200, “[t]he court may make such additional orders or judgments as may be necessary to restore to any person in interest any moneys or property, real or personal, which may have been paid out as a result of any practice declared to be unlawful by KRS 367.130 to KRS 367.300.”

28. Pursuant to KRS 367.990(2), if the court finds a person is willfully violating or has willfully violated the KCPA, the Attorney General may recover a civil penalty on behalf of the Commonwealth of “not more than two thousand dollars (\$2,000.00) per violation, or where the defendant’s conduct is directed at a person aged sixty (60) or older, a civil penalty of not more than ten thousand dollars (\$10,000) per violation, if the trier of fact determines that the defendant knew or should have known that the person aged sixty (60) or older is substantially more vulnerable than other members of the public.”

29. By engaging in the conduct described in this Complaint, the Defendants have repeatedly violated the KCPA by engaging in the unfair, false, misleading, and deceptive practices.

30. As to the consumers identified in this Complaint, as well as all others similarly situated, Defendants have engaged in unlawful conduct under KRS 367.170 in the following ways (each and every time of one the following occurred constituting a separate violation): by failing to inform consumers that they were not properly registered in the Commonwealth of Kentucky to move household goods in intrastate travel. Each move in intrastate travel constitutes a separate violation of KRS 367.170.

31. Margaret’s Movers’ conduct, through its agents, was and is willful.

32. Margaret’s Movers’ conduct, through its agents, is ongoing.

33. As a result of this conduct, the Commonwealth is entitled to recover, on behalf of the Commonwealth, a civil penalty of not more than two thousand dollars (\$2,000) per

violation or where Margaret's Movers' conduct is directed at a person aged sixty (60) or older, a civil penalty of not more than ten thousand dollars (\$10,000) per violation, if the trier of fact determines that the defendant knew or should have known that the person aged sixty (60) or older is substantially more vulnerable than other members of the public.

34. By engaging in the conduct above, including, but not limited to, misrepresenting Margaret's Movers certification and qualifications to move and store household goods within the Commonwealth of Kentucky pursuant to KRS 281.630 and related statutes, Margaret's Movers has committed willful violations of KRS 367.170. Every move in which Margaret's Movers has transported goods since 2015 was made under false representation and assurances.

35. Margaret Weathers is also liable in her individual capacity as result of these and other actions that she took constituting multiple separate violations of the KCPA, including but not limited to, failing to ensure that Margaret's Movers obtained the required certificate to provide intrastate moving services in the Commonwealth and advertising and providing such services despite not being permitted by law to do so. As a co-owner of Margaret's Movers, Margaret Weathers was actively involved in the company's multiple, separate KCPA violations or was, at the very least, aware of the company's failures to comply with the law and did nothing about it. For example, Ms. Weathers was personally involved in the failure of the company to be properly registered with the Department of Vehicle Registration as she was the individual responsible for submitting the company's registration application to the Department of Vehicle Registration. In addition, in response to the Office's CID, Ms. Weathers is identified as the owner responsible for the overall administration of Margaret's Movers.

36. By making misrepresentations about their authority to provide intrastate moving services Defendants have engaged in unfair, false, misleading, and deceptive practices that are prohibited by the KCPA.

37. Pursuant to KRS 367.990(2), if the court finds a person is willfully violating or has willfully violated the KCPA, a civil penalty of “not more than two thousand dollars (\$2,000.00) per violation” may be imposed.

38. As a direct result of Defendants’ violations of KRS 367.170, Defendants have caused harm, loss or injury to persons in the Commonwealth, including, but not limited to, depriving Persons of money and property by means of unfair, false, misleading, or deceptive business practices.<sup>1</sup>

#### **IV. PRAYER FOR RELIEF**

**WHEREFORE, Plaintiff**, Commonwealth of Kentucky, by counsel, requests that this Court: prays for a judgment against Defendants Margaret’s Moving Inc. and Margaret Weathers as follows:

- a) Enter judgment against Defendants in favor of Plaintiff for each violation alleged in this Complaint;
- b) Enter a permanent injunction to prevent Defendants’ future violations of law;
- c) Award such equitable relief as the Court finds necessary to redress consumer injury resulting from Defendants’ violations of the law including, but not limited to, restitution and disgorgement of ill-gotten gains under KRS 367.200 and Kentucky common law;
- d) Make such orders or render such judgments as may be necessary to restore to any Person any ascertainable losses, including statutory and pre-judgment interest, suffered by reason of the alleged violations of law;

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<sup>1</sup> As defined in KRS 367.110 (1), “‘Person’ means natural persons, corporations, trusts, partnerships, incorporated or unincorporated associations, and any other legal entity.”

- e) For each and every violation of the KCPA, order Defendants to pay civil penalties to the Commonwealth of Kentucky of not more than \$2,000 per violation of the KCPA, or \$10,000 per violation of the KCPA where Defendants' conduct was directed at a person aged sixty (60) or older and substantially more vulnerable than other members of the public, as provided by KRS 367.990(2);
  - f) Award the Commonwealth of Kentucky its costs and attorneys' fees;
  - g) Award the Commonwealth of Kentucky prejudgment interest as permitted by law;
  - h) Award any and all such further relief as the Court deems just and proper
- Plaintiff demands trial by jury on all issues so triable.

Respectfully submitted,

RUSSELL COLEMAN  
ATTORNEY GENERAL

/s/ John Ghaelian  
John M. Ghaelian (94987)  
Jonathan E. Farmer (91999)  
Assistant Attorney General  
Office of Consumer Protection  
Office of the Attorney General  
1024 Capital Center Drive  
Frankfort, KY 40601  
John.ghaelian@ky.gov  
Jonathan.farmer@ky.gov  
(502) 696-5314  
(502) 696-5448

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**Professional Moving Service In Louisville,  
Kentucky And The Surrounding Areas**

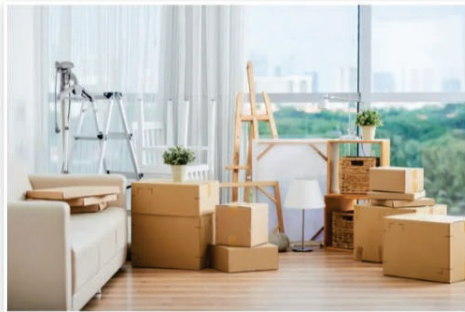




local moving service in Lexington, Indianapolis, Louisville, and the surrounding areas. When you're looking for a honest mover choose Margaret's Moving & Storage. We are a family owned company providing complete moving services for over 18 years. We always offer competitive rates on storage and moving solutions for businesses and families. Please contact us today at 502-584-5234 for a free quote. We are always happy to welcome new customers.

## Reliable Moving Services

Margaret's Moving & Storage provides moving service for both large and small moves. You can pack on your own or we will pack your whole house if you prefer a full-service move. Whatever your moving needs are, we offer as many or as few moves as you need. We also offer all the moving supplies you need.



## Private & Secure Storage

When you choose Margaret's Moving & Storage for your moving service we will keep your valuable items secure in our warehouse. Our storage is not open to the public, it is only for our moving customers, so you can be certain your valuables are safe.

## Moving Insurance

### Where We Are A Preferred Vendor

Margaret's Moving & Storage provides each of our customers .60 per pound per article if your item gets damaged. This is not insurance. If you want to buy moving insurance for Full Value Replacement visit [www.movinginsurance.com](http://www.movinginsurance.com).

## Understand Your Rights!

Learn about your responsibilities and rights when moving. Visit [www.protectmymove.gov](http://www.protectmymove.gov) for more information.

## Contact Us Today!

At Margaret's Moving & Storage, we know that moving can be very stressful. That is why we go above and beyond to make your moving experience the best you will ever have! Call our licensed moving consultants now at 502-584-5234 for the best movers in town!

Filed

25-CI-00771 08/11/2025

Kathryn Marshall, Franklin Circuit Clerk



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#### CONTACT INFORMATION

PHONE: 502-584-5234  
 ADDRESS: 104 E Breckinridge St, Louisville, KY 40203  
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## Experienced Residential And Commercial Moving Services



We know how stressful moving can be, and that is why we work with complete dedication to make your move as stress-free and easy as possible. At **Margaret's Moving & Storage**, our team always provides you with an exceptional move experience, no matter how big or small your move is. For over 18 years, we have been providing superb moving services in **Louisville, Indianapolis, Lexington, and the surrounding areas**. We also are licensed to move you from state to state (called interstate moving). Give me a call for a quote.

Our moving crews have years of experience and they are always fast, honest, and reliable employees. We are happy to help you with all your moving needs. **Our team would love to be your mover for life!**

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## Moving Supplies We Offer:

- Small/book Boxes
- Medium Boxes
- Wardrobe Boxes
- Carts & Dollies
- Dish Packs
- Paper pads
- Packing Supplies
- Padding & Quilts
- Padlocks
- Pallets
- Ropes
- Straps & tie downs
- Foam padding
- Stretch-Wrap
- Packing Tape
- Tv boxes



## Trusted Moving Services

At Margaret's Moving & Storage, we take great pride in our moving services. We care for your belongings as if they were our own. It is your personal property, and we do our absolute best to protect it throughout the moving process. Our trained movers have years of experience in residential and commercial moves. We always go the extra mile to provide our customers with excellent customer service.

## Our Move Types:

- Commercial Moves
- Office Moves
- Computer Moves
- Confidential Moves
- Display & Exhibit Moves
- Do-It-Yourself Moves
- Emergency & Short-Notice
- Employee Relocations
- Estate Moves
- Extra Large Load Moves
- Hi-Rise Moves
- Industrial Moves
- Moving & Relocation
- Pianos
- Residential Moves
- Safe Moves
- Senior Moves
- Single-Piece Moves
- Small Load Moves
- Trade Show Moves



## Contact Margaret's Moving & Storage Today!

We are always happy to answer your moving questions and get you started with a free quote. Call us at **502-584-5234** now!

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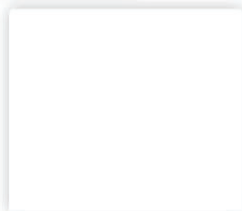
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## Our History



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2020 September - Covid took a toll on everyone including us. We downsized back to our original warehouse aka "our roots"!

2013 December~Won WHAS Best of Kentuckiana AGAIN!

2013 December~Partnered with the Marine Corp Toys for Tots program & collected toys at various parties and the annual Marine Corp Toys for Tots Motorcycle Run at Papa Johns Stadium. Collected more than 10,000 toys.

2013 December~Partnered with the Salvation Army Angel Tree program and picked up & delivered approximately 7000 adopted angels gifts from local malls to the Salvation Army processing center.

2013 November~Assisted the Marine Corp Toys for Tots program in purchasing \$10,000 in toys at a local Toys R Us!

2013 May~Performed collection/moving services for community recycling program for The Energy Pros of Louisville!

2013 May~Enrolled Rhonda, Suzanne, Cheyanne & Jason in the Certified Moving Consultant Designation Program w/ AMSA

2013 April~Cheered on the Kentucky Derby Marathon runners outside our office. Check out our photo gallery for pictures!

2013 April~Moved 2013 University of Louisville Cardinals NCAA Championship Basketball & Hall of Fame Coach, Rick Pitino

2013 April~Recertified as a Female Business Enterprise with the Louisville/Jefferson County Human Relations Commission

2013 March~Procured additional and larger storage facilities

2013 March~Crystal, Magan & Jason earn their COIC Designation through AMSA

2013 February~Presented with an award from the Salvation Army for our time and resources making the Angel Tree and Toys for Tots Programs each a success.

2012 November 25-December 10~Partnered with the Salvation Army Angel Tree to collect the boxes of toys donated daily at the 3 area Louisville malls for sorting and fulfillment at the Salvation Army Male campus

2012 November 27~Collected two 26 foot trucks full of toys for the "Toys for Tots Motorcycle Run, hosted by the Kentucky Motorcycle Association and The Marine Corps League

2012 November 26~Initiated a toy drive and collected cash donations and toys at the University of Louisville's Men's Football game vs UConn in 3OT game at Papa John's Cardinal Stadium

2012 November 25~Partnered with Toys for Tots and provided trucks and staffing to collect toys at the Light Up Louisville celebration at 4th Street

2012 November~Presented with award for #1 Penske agent in Louisville for the 3rd time in 3 years of being an agent

2012 October~Became the Official Mover of the University of Louisville Cardinals

2012 October~Partnered with KentuckianaWorks, JCTC & AMSA for the RAMP (Registered American Moving Professional) Program. Press conference with Louisville Mayor Greg Fischer and Representative John Yarmuth for program roll out in Kentucky, the first region in the US to start the program.

2012 September~Magan, Crystal and Jason enrolled in the AMSA Certified Office & Industrial Consultant program

2012 August~Magan & Crystal both earned their Certified Moving Consultant Designation w/ AMSA

2012 Won CityVoter BEST MOVER IN LOUISVILLE AGAIN!

2011 February~Took 3rd place in the WHAS Best of Kentuckiana

2011 January~Dustin earned the AMSA Certified Moving Consultant (CMC) designation

2010 November~Became members of the Kentucky Household Goods Carriers Association

2010 September~Became member of the Claims Prevention & Procedure Council (CPPC)

2010 September~Became members of the Progressive Claim Prevention

2010 August~Received Satisfactory Rating with Federal Motor Carrier Safety Administration (FMCSA)

2010 August~Featured in Business First of Louisville

2010 August~We became #1 Penske Agent in Louisville

2010 August~Became members of Greater Louisville Inc, Metro Louisville's Chamber of Commerce (GLI)

2010 May~Becky earned AMSA Certified Moving Consultant (CMC) designation

2010 March~Granted Jefferson County Public Schools 2 year renewable contract

2010 February~Contracted by Disney to move the baby grand piano used in the movie, "Secretariat".

2009 Spring~Featured in Sullivan University's Herald

2009 Spring~Became only Louisville members of the Plastic Loose Fill Council (packing peanuts recycling)

2009 March~Margaret earned Kentucky's **only** AMSA Certified Office & Industrial Consultant (COIC) designation

2008 Member of American Moving & Storage Association (AMSA)

2008 September~Certified as a Female Business Enterprise by Louisville/Jefferson County

2008 August~WLKY Winner Best Mover in Louisville

2008 May~Granted Jefferson County Public Schools 2 year renewable contract

2008 May~Moved Muhammad & Lonnie Ali into their new Louisville home

2008 May~Margaret earned AMSA Certified Moving Consultant designation

2008 May~Moved to 104 E Breckinridge location and added greater storage capacity

2008 March~Featured in Business First of Louisville

2007 July~Received Satisfactory Rating with Federal Motor Carrier Safety Administration (FMCSA)

2007 June~Received Interstate Authority

2006 February~LEAP Wireless Intl Corp contracted us to place the new Cricket telecommunications tower, just in time for Cricket Wireless to go live in Louisville, KY!

2006 Began offering storage to our list of services

2004 Partnered with Uhaul Inc to become Authorized Dealer

2004 Opened April 2004

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**AFFIDAVIT OF BILL DEBORD**

I, William C. Debord, being first duly sworn, do hereby depose and state as follows:

1. I am employed by the Commonwealth of Kentucky, Transportation Cabinet, Department of Vehicle Regulation, Division of Motor Carriers, as an Administrative Specialist III.
2. I am competent to testify to the facts alleged herein, and I have personal knowledge of these facts.
3. My job duties include, but are not limited to, monitoring the activities of Kentucky household goods carriers (i.e., those individuals and businesses who transport personal property used in a dwelling), responding to complaints by citizens pertaining to the services of Kentucky household goods carriers, and monitoring and assisting with the licensing of Kentucky household goods carriers.
4. My job duties require me to monitor the holders of various intrastate for hire operating authorities, including household goods certificate carriers to ensure that they are properly licensed.
5. The Division of Motor Carriers maintains a list of all authorized motor carriers in the Commonwealth of Kentucky that hold a household goods certificate. The list was last updated on June 1, 2025, and Margaret's Movers is not listed.
6. Arthur Weathers and Margaret Weathers, individually and doing business as Margaret's Movers Inc., Margaret's Moving and Storage, have not held a household goods certificate or license from December 31, 2015, until the present day as required by KRS Chapter 281 for the intrastate transportation of household goods.



I AFFIRM UNDER PENALTY OF PERJURY THAT THE FOREGOING REPRESENTATIONS ARE TRUE.

  
WILLIAM C. DEBORD

COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF Franklin )

Subscribed and sworn to before me, a Notary Public, by BILL DEBORD, on this 6<sup>th</sup>,  
day of August, 2025.

Melissa L. Gash KYNP36487  
NOTARY PUBLIC

My commission expires: 9-10-2025

10/3/22, 9:21 AM

<https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin>

# ATTORNEY GENERAL **DANIEL CAMERON**

## Secure Online System

### Application Information

Submission Id **037ea122-7835-4412-afd9-b3298368dbc9**Completion Date **10/1/2022 2:55:20 PM**

### Consumer Complaint and Mediation Form

Name **Jackie Evans**Address **4334 Foeburn Lane**City **Louisville**State **KY**ZIP/Postal Code **40207**County **Jefferson**Home Phone **502-314-4693**Mobile Number **502-314-4693**E-Mail **Jackiehevens@gmail.com**Are you Active Duty Military? **No**Company or person your complaint is against **Margaret's Moving and Storage**Company Address **2620 7th street road**Company City **Louisville**Company State **KY**Company ZIP **40208**Company Phone **502-584-5234**

Company E-Mail

Was a contract signed? **False**Date(s) of transaction **July 13th, 2017**Product or service involved **Entire belongings of a residential property**

10/3/22, 9:21 AM

<https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin>Total Price **10,500**Amount Paid **10,500 plus 2500 for deliveries after storage**How did you hear about this product or service? **0**With what other agencies have you filed a complaint? **0**What action was taken by those agencies? **0**Have you hired or retained an attorney? **False**Have you started court action? **False**

What action will resolve your complaint? **Acknowledging the fraud/stolen property of my storage items. Restitution for all who have had similar issues with their property at Margaret's Moving and Storage.**

Briefly state the facts of your complaint **-items of household were removed from property but many items were never returned after storage. Nothing was left at the property after initial move. 2-3 Pallets of furniture and miscellaneous boxed items were never delivered back to owner.**

Document Upload

## Electronic Signature

I Acknowledge **False**Electronic Signature **Jacqueline h evans**Date **10/01/2022**

## Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

## HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification

**May, Shellie A (KYOAG)**

---

**From:** Jackie Evans <jackiehevens@gmail.com>  
**Sent:** Friday, September 30, 2022 1:22 PM  
**To:** May, Shellie A (KYOAG)  
**Subject:** Margaret's Moving and Storage Claim

To whom it may concern,

Margaret's Moving and Storage was hired on July 13th, 2017 by Greg Evans to move and store the contents of 6900 Longview Lane, Louisville, Kentucky 40222. On July 14th, roughly around 9:30am they started the process and completed late into the afternoon on the 14th. No furniture was left behind, only trash and items to be moved by the Evans. Jackie Evans, Greg's wife at the time paid Margaret on July 14, July 19 and on another day for the fee of moving and storing all belongings on pallets. The total payment was over \$10,000.

Margaret's Storage was located at 2620 Seventh Street , Louisville, KY 40208.

I visited that location 3 times to make the payments and briefly saw my belongings grouped together on pallets. Margaret's held my furniture , boxes, etc until June 2018, August 11, 2018 and September 10th . They delivered my pallet items to a friend's warehouse first , then the remaining items to a storage center.

Margaret's was paid in full for all three moves. After the final delivery, it was clear I had numerous belongings ``stolen" . The items are noted as 1 blue harvest table (\$2500), 2 Lane Venture Outdoor Wicker Loveseats (\$3200), Large Bar(\$650) and antique long bench (\$350) from Merridan Home Furnishings, Hall bench with Yellow Crewel fabric (\$1200), 1 ping pong table (\$400) and various boxes of kitchen and personal items.

I notified Margaret's that many pieces were gone, their response was that they delivered everything and whatever was missing must have been left behind. No furniture was left behind.

With that being said, I went to the Seventh Street location to look for my missing items and to my surprise they had moved. The woman in the office said they moved to Hill Street. I went to Hill Street 4 or 5 times to look for my belongings, however they were never located. During the times at Hill Street, I saw Kim Smith's pallets of furniture and boxes. It was a large area and seemed to be full of upholstery, boxes, mattresses and casegoods.

Unfortunately, Kim had so much more stolen from Margaret's storage facility. The amount of palletized items I saw at Hill Street and the amount of furniture delivered to Kim's house definitely were not of equal quantity. It should have been truck loads of furniture instead of one sole trunk. I was at her home on the delivery day and witnessed the entire delivery.

Best,

Jackie Evans

Sent from my iPhone

10/3/22, 9:18 AM

<https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin>

# ATTORNEY GENERAL **DANIEL CAMERON**

## Secure Online System

### Application Information

Submission Id **d076a5b2-eae6-4db0-b097-983bb2ee4b0f**Completion Date **9/30/2022 11:50:24 AM**

### Consumer Complaint and Mediation Form

Name **Kimberly Smith**Address **10213 Timberwood Circle**City **Louisville**State **KY**ZIP/Postal Code **40223**County **Jefferson**Home Phone **502-442-5715**Mobile Number **502-442-5715**E-Mail **kimray.smith1@outlook.com**Are you Active Duty Military? **No**Company or person your complaint is against **Margaret's Moving and Storage**Company Address **104 East Breckinridge Street**Company City **Louisville**Company State **KY**Company ZIP **40203**Company Phone **502-584-5234**Company E-Mail **margaret@margaretsmoving.com**Was a contract signed? **True**Date(s) of transaction **11/17/17 through 07/29/22**Product or service involved **Moving and storage**<https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin>

10/3/22, 9:18 AM

<https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin>Total Price **\$49,416**Amount Paid **\$49,416**How did you hear about this product or service? **Friend**With what other agencies have you filed a complaint? **Reached out to Jefferson County Attorney and file a police report with Shively PD**What action was taken by those agencies? **none**Have you hired or retained an attorney? **True**Have you started court action? **False**

What action will resolve your complaint? **Full Replacement of the \$390,000+ of items that are missing/stolen, reimbursement of the storage and moving fees of \$49,416 and repair of the \$25,000 in repairs needed for items received damaged. Consumer Protection Agency investigation to prevent future damage and loss to future customers**

Briefly state the facts of your complaint **See attached overview doc**

Document Upload

## Electronic Signature

I Acknowledge **True**Electronic Signature **Kimbely L Smith**Date **09/30/22**

## Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

## HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**

**May, Shellie A (KYOAG)**

---

**From:** kim smith <kimray.smith1@outlook.com>  
**Sent:** Friday, September 30, 2022 1:26 PM  
**To:** May, Shellie A (KYOAG)  
**Subject:** Smith Loss  
**Attachments:** 4500 River Road Storage Inventory additional items missing.xlsx; LossInventory Submitted to State Farm.pdf

**\*\*CAUTION\*\* PDF attachments may contain links to malicious sites. Please contact the COT Service Desk [ServiceCorrespondence@ky.gov](mailto:ServiceCorrespondence@ky.gov) for any assistance.**

Shellie,

I have attached all the loss I submitted to State Farm. I have full replacement insurance – if they quit denying it. This does not include irreplaceable like photos and memorabilia from my girls childhood. This is the equivalent to a fire – I am still remembering items that are missing as I finish opening boxes. They had an initial inventory upon the initial move of all case goods, furnishings, electronics, rugs and furs (most of which are missing). I did not have a complete inventory of the 450 boxes content. Most boxes are open except the xmas as there are many and I haven't had time.

Kim Ray Smith  
Certe Management  
502.442.5715  
Sent from [Mail](#) for Windows



10/3/2022 11:03 AM

## Additional Missing and Damaged

Foyer	QTY	RECEIVED	NOTES	Est Replacement Value
Lamp and shade	1	0		450
Decorative items	3	0		1800
Living Room				
Framed wall décor	4			1200
decorative items	6			850
Dining Room				
Large brass hurricanes	2	0-Jan		600
Floral table plate set/centerpiece	8	0		750
Salt Cellar Collection - Limoge	20	0		1200
Salt Cellar Collection - cobalt and sterling	8	0		550
Salt Cellar Collection - gold procelain	18	0		250
Sterling Salt spoons	24	0		1100
Pewter Salt Spoons	16	0		250
Murano Glass Vases - color	3	0		950
Family Room				
Framed wall décor	4	0		1800
Custom shelves for decoys	4	1	250 each	750
Kitchen				
Glassware service for 16	1	0	tail and shorts	450
coaster - leather		0		85
coasters - glass		0		160
Pot Holders		0		100
Cooler - large	1	0		200
Cooler - small	12	0		75
butter dish - porcelain	1	0		75
tin cabinet spice rack	2	0		250
Wood cutting boards	3	0		500
Cutting boards - rubber	4	0		40
Kuerig Coffee Maker - Stainless	1	0	Missing	200
Chester Paralelm Delphin	1	1	Broken/replaceable	
Strip Oil Painting	1	1	Canvas Damaged	

## Additional Missing and Damaged

10/3/2022 11:03 AM

salt box - marble	1	0			40
measuring cups and spoons- metal - all clad	1	0			120
glass mixing bowls - nest	1	0			50
Chair Cushions	8			Damaged Fabric - cuts	1250
Library					
By seat horse trained horse	1	0		Do not know \$1500	1500
Master bedroom					
Decorative items	5	0			1500
Framed decorative items	6	0			
Wing back chairs	2	1		Damaged Cushions	
Lamps and shades	5	2			1500
TV Room					
Leather ottoman	1	1		Damaged	850
Custom side chairs - BWD	2	2		Dirty	
3 antique foot stools - BWD	3	3		Dirty	
Uppper Hall					
Lizzy Room					
Framed wall art	2	0			450
Custom Bedding Lizzy Room	1	0		Missing	1100
Bernhart Chest	1	1		Bowed out in back/drawers not closing/not repairable	3200
Skirted Round Table	1	1		Damaged	950
Baker Club Chair	1	1		Dirty/fabric damaged	
Teal Bench	2	2		1 damaged	450
White and blue wood desk chair	1	1		Dirty/fabric damage	
Katie Room					
Antique Hall table from bed	1	1		Damaged/Repairable missing	
Barbra Berry Bedding	1	0		Blank for	500
Mattress/box springs - Full	1	1		Dirty/Damaged	1800
Misc:					
Antique Side Chairs	4	3		One Missing	1200
Barstools	3	3		Damaged/Repairable	

10/3/2022 11:03 AM

## Additional Missing and Damaged

Long Camel Cashmere Coat/Max Mara	1	0	Missing/Box torn open	2400
Black Pants suit	1	0	Missing/Box torn open	1500
Bed Pillows	12	0		1300
Ballard Design Outdoor Umbrella	1	0		950
Ballard Design Umbrella Stand	2	0		400

## Loss Inventory

Submitted 8/18/2022 8:21:16 PM UTC

Item Description	Brand or Manufacturer	Model Number	Qty Lost	Item Age	Cost to Replace Pre-tax (each)	Place Where Purchased/Obtained	Condition	Room
Antique Accent Chair with Pineapple carved legs	Unknown		1	50yr/0mo	\$3,500.00	Antique /show	Above Average	Foyer
Baker Historic Charleston Demi Lune Tables	Baker		2	10yr/0mo	\$7,500.00	Baker	Above Average	Foyer
Baker Flip Top Game Table	Baker	2577	1	18yr/0mo	\$9,500.00	Baker	Above Average	Living Room
Baker Chippendale Loveseat/Custom Fabric	Baker	845-64	1	19yr/0mo	\$10,000.00	Baker	Above Average	Living Room
Baker Pie Crust Tilt Top Table	Baker	1965	1	19yr/0mo	\$3,500.00	Baker	Above Average	Living Room
Baker Historic Charleston Side Chairs w / Custom Fabric	Baker		2	23yr/0mo	\$4,000.00	Baker	Above Average	Living Room
Brass Coffee Table	Unknown		1	18yr/0mo	\$3,000.00	Unknown	Above Average	Living Room
Tibetan Rug			1	19yr/0mo	\$7,500.00	Fran Jasper Rugs	Above Average	Living Room
Baker Side Table	Baker		1	16yr/0mo	\$3,500.00		Above Average	Living Room
Antique carved mahogany Plantstands	Unknown		2	40yr/0mo	\$750.00	Antique Dealer	Above Average	Living Room
Custom wood Carved Drapery Rods - 8'4" with Rings			3	20yr/0mo	\$1,000.00	Selby House	Above Average	Living Room
Custom Panels with Baker Fabric			3	20yr/0mo	\$5,000.00	Selby House	Above Average	Living Room
Black and gold long mirror neo classical			1	70yr/0mo	\$1,250.00	Antique Dealer	Above Average	Living Room
Primitive Pine Dry Sink mid 1800's	Unknown		1	125yr/0mo	\$4,200.00	Auction	Above Average	Family Room
Baker Regency Leather Bench	Baker		1	15yr/0mo	\$6,500.00	Baker	Above Average	Family Room
Milling Road 68" inlaid mahogany round table	Baker	41197	1	20yr/0mo	\$12,000.00	Baker	Above Average	Dining Room
Iron Bed	Brass Beds of Va		1	30yr/0mo	\$5,000.00	Inherited	Above Average	Bedroom
Queen Mattress and Boxspring	Stems and Foster		1	6yr/0mo	\$5,000.00		Above Average	Bedroom
King Mattress and Boxspring			1	7yr/0mo	\$10,000.00		Above Average	Bedroom
Club Chair - Leather	Arhaus		2	8yr/0mo	\$4,500.00		Above Average	Family Room
Leather Ottoman	Arhaus		2	8yr/0mo	\$2,000.00		Above Average	Family Room
Maitland Smith Leather Chest	Maitland Smith		1	6yr/0mo	\$2,000.00	Dwellings	Above Average	Family Room
Antique Victorian Pine dresser style Sideboard	Unknown		1	140yr/0mo	\$4,500.00	Inherited	Above Average	Family Room
Sony tv	Sony		1	5yr/0mo	\$800.00	Best Buy	Above Average	Bedroom
Baker Mahogany Dining Chair	Baker		8	19yr/0mo	\$2,000.00	Baker	Above Average	Dining Room
9 x 12 Persian Serapi Rug			1	100yr/0mo	\$7,500.00	Fran Jasper Rugs	Above Average	Dining Room
Antique 3 legged Pine Plant Stand	Unknown		1	100yr/0mo	\$2,500.00	Inherited	Above Average	Dining Room
Custom Wool Sisel Rug	Unknown		1	8yr/0mo	\$6,500.00		Above Average	Dining Room
Baker Chest	Baker		1	14yr/0mo	\$7,500.00		Above Average	Dining Room
Large Bronze Indian Statue	Unknown		1	50yr/0mo	\$3,800.00	Inherited	Above Average	Library

Loss Inventory for Claim # 1737K151K Page 1 (printed 9/6/2022 2:02:13 PM UTC)

Baker French Country bed w/ leather	Baker	1922-06	1	20yrf0mo	\$20,000.00	Baker	Above Average	Master Bedroom
Baker French Chemy Chest	Baker	2574	1	20yrf0mo	\$8,500.00	Baker	Above Average	Master Bedroom
Baker English Cottage Chair	Baker		1	13yrf0mo	\$5,500.00	Baker	Above Average	Master Bedroom
Leather Top Antique Side Tables	Unknown		2	60yrf0mo	\$2,000.00	Antique Dealer	Above Average	Master Bedroom
French Napoleon Salon Chair			1	125yrf0mo	\$2,100.00	Antique Dealer	Above Average	Master Bedroom
Custom Pull Out Sofa			1	5yrf0mo	\$3,300.00	Barry Wooley Designs	Above Average	Game Room
Nesting Tables	Pottery Barn		1	5yrf0mo	\$650.00	Pottery Barn	Above Average	Game Room
Antique Wicker Side Chairs	Creel and Gow		1	45yrf0mo	\$1,500.00	Inherited	Above Average	Game Room
50" Television	Sony		1	7yrf0mo	\$1,500.00	Best Buy	Above Average	Game Room
XBox with package	Xbox		1	7yrf0mo	\$899.00	Best Buy	Above Average	Game Room
Orange 4x7 rug			1	6yrf0mo	\$1,250.00	BWD	Above Average	Game Room
Dell Monitor	Dell		1	6yrf0mo	\$350.00	Best Buy	Above Average	Game Room
HP Printer office jet pro	HP		1	7yrf0mo	\$275.00	Best Buy	Above Average	Game Room
Baker Chest	Baker	7968	1	19yrf0mo	\$8,000.00	Baker	Above Average	Study
Italian Wine Table			1	5yrf0mo	\$1,650.00	BWD	Above Average	Bedroom
Window Panels - Ivory	Donna Karen		10	5yrf0mo	\$350.00	Donna Karen	Above Average	Bedroom
Ivory/Tapered Lamps			2	5yrf0mo	\$320.00	BWD	Above Average	Bedroom
Mirrored Desk			1	5yrf0mo	\$2,450.00	BWD	Above Average	Bedroom
Console Table	Pottery Barn		1	5yrf0mo	\$1,000.00		Above Average	Bedroom
Orange Glass Lamps			2	6yrf0mo	\$320.00	Barry Wooley Designs	Above Average	Bedroom
Suri 9 x 12 Navy Rug			1	6yrf0mo	\$2,200.00		Above Average	Bedroom
Custom window Treatment/Katie Room			1	6yrf0mo	\$1,250.00	BWD	Above Average	Bedroom
Kenmore Canister Vacuum	Kenmore		1	8yrf0mo	\$585.00		Above Average	Closet
42" Tv	Sony		2	6yrf0mo	\$450.00	Best Buy	Above Average	Bedroom
Baker Side Table	Baker	7972	1	20yrf0mo	\$3,500.00	Baker	Above Average	Living Room
Pottery barn outdoor wicker 2 chairs 2 ottomans	Pottery Barn		1	7yrf0mo	\$4,000.00	Pottery Barn	Above Average	Lawn / Patio / Deck
Sonos smart speakers	sonos		3	5yrf0mo	\$299.00	Best Buy	Above Average	Family Room
Sound Bar with Woofer	Sony		1	8yrf0mo	\$650.00	Best Buy	Above Average	Game Room
72" Aquos TV			1	8yrf0mo	\$1,000.00	Best Buy	Above Average	Family Room
Magnolia Stereo Receiver	Magnolia		1	8yrf0mo	\$899.00	Best Buy	Above Average	Family Room
32" television			2	6yrf0mo	\$250.00	Best Buy	Above Average	Bedroom
Coffee Grinder	Capresso		1	10yrf0mo	\$99.00	Williams Sonoma	Average	Kitchen
Flatware 20 piece			2	7yrf0mo	\$460.00	Williams Sonoma	Average	Kitchen
Serving pieces			1	7yrf0mo	\$250.00	Williams Sonoma	Average	Kitchen
Toaster	Breville		1	6yrf0mo	\$200.00	Williams Sonoma	Above Average	Kitchen
Slow Cooker	All Clad		1	5yrf0mo	\$330.00	Williams sonoma	Above Average	Kitchen
Hand Mixer			1	6yrf0mo	\$140.00	Williams Sonoma	Above Average	Kitchen
Wustof Knife Set	Wustof		1	9yrf0mo	\$1,500.00	Williams Sonoma	Above Average	Kitchen
Stainless Steel French Press			1	8yrf0mo	\$85.00	Williams sonoma	Above Average	Kitchen
Baking Pans	Williams Sonoma		1	5yrf0mo	\$75.00	Williams Sonoma	Above Average	Kitchen

Loss Inventory for Claim # 1737K151K Page 2 (printed 9/6/2022 2:02:13 PM UTC)

All Clad cookware	All Clad			1	10yr/0mo	\$900.00	Williams Sonoma	Above Average	Kitchen
Salt and Pepper Mills	Williams sonoma			1	6yr/0mo	\$100.00	Williams Sonoma	Above Average	Kitchen
Stainless Roaster	All clad			1	8yr/0mo	\$200.00	Williams Sonoma	Above Average	Kitchen
Hart Chandelier	Hart			1	19yr/0mo	\$3,500.00	Rueff Lighting	Above Average	Dining Room
Custom wood curtain rods w/rings				3	19yr/0mo	\$1,000.00	Selby House	Above Average	Master Bedroom
Black and Gold Mirror - Medium				1	20yr/0mo	\$2,000.00		Above Average	Master Bedroom
Faux Burlap Custom Shower Curtain				1	5yr/0mo	\$600.00		Above Average	Bathroom
Gray framed bathroom accessories				3	5yr/0mo	\$175.00		Above Average	Bathroom
Tanita Body Composition Weight Scale	Tanita			1	6yr/0mo	\$100.00	Amazon	Above Average	Bathroom
Waterford Crystal service for 8				1	12yr/0mo	\$2,750.00		Above Average	Dining Room
Baccarat Crystal Service for 8				1	11yr/0mo	\$3,750.00		Above Average	Dining Room
Simon Pearce Martini	Simon Pearce			8	10yr/0mo	\$85.00	Simon Pearce	Above Average	Dining Room
Simon Pearce Tumblers	Simon Pearce			8	10yr/1mo	\$85.00	Simon Pearce	Above Average	Dining Room
Simon Pearce Whiskey				8	10yr/0mo	\$75.00		Above Average	Dining Room
Simon Pearce - White				8	11yr/0mo	\$85.00		Above Average	Dining Room
Simon Pearce - Red				8	11yr/0mo	\$85.00		Above Average	Dining Room
Simon Pearce - Champagne				8	11yr/0mo	\$85.00		Above Average	Dining Room
Waterford Red				8	7yr/0mo	\$85.00		Above Average	Dining Room
Antique etched crystal service for 8				1	100yr/0mo	\$1,000.00	inherited	Average	Dining Room
Black Tie Bagley Mischka Black Evening Gown	Bagley Mischka			1	9yr/0mo	\$650.00	SAKS	Above Average	Closet
Nicole Miller Cocktail Dress	Nicole Miller			1	6yr/0mo	\$795.00	Rodeo Drive	Above Average	Closet
Grey Nicole Miller Gown	Nicole Miller			1	7yr/0mo	\$700.00	Rodeo Drive	Above Average	Closet
Bagley Mischka Cocktail Dress	Bagley Mischka			1	6yr/0mo	\$495.00	SAKS	Above Average	Closet
Halston Gown	Halston			1	6yr/0mo	\$675.00	NM	Above Average	Closet
Halston Cocktail Dress	Halston			2	6yr/0mo	\$600.00	Blink Boutique	Above Average	Closet
Leather Desk				1	8yr/0mo	\$2,750.00		Above Average	Study
Waterford White				8	7yr/0mo	\$85.00		Above Average	Dining Room
Waterford Champagne				8	7yr/0mo	\$85.00		Above Average	Dining Room
lux king blanket				1	7yr/0mo	\$225.00	NM	Above Average	Master Bedroom
lux queen blanket				1	7yr/0mo	\$200.00	Bloomingdales	Above Average	Bedroom
Metal Maitland Smith Tole Containers - pair	Maitland Smith			2	15yr/0mo	\$455.00	Antique Shop	Above Average	Living Room
Various Platters				10	13yr/0mo	\$100.00	Various Retailers	Above Average	Storage Area/Room
Sterling Salad Forks	Gorham			8	19yr/0mo	\$100.00		Above Average	Dining Room
Hall Runner Rugs				4	9yr/0mo	\$1,000.00		Above Average	Foyer
7ft Christmas Tree	Balsam Hill			1	8yr/0mo	\$650.00	Balsam Hill	Above Average	Storage Area/Room
Baker Book Table	Baker			1	17yr/0mo	\$3,000.00	Baker	Above Average	Family Room
Antique Portuguese table linens for harvest table				2	44yr/0mo	\$250.00	Inherited	Above Average	Kitchen
Black Lamp with bee				1	12yr/0mo	\$750.00		Above Average	Master Bedroom
Waterford Table Linens for Harvest Table				2	10yr/0mo	\$250.00		Above Average	Kitchen

Loss Inventory for Claim # 1737K151K Page 3 (printed 9/6/2022 2:02:13 PM UTC)

Potterbarn Hemstitched table runner - harvest table				4	8yr/0mo	\$125.00		Above Average	Kitchen
18 x 18 Blue Chenille pillows				2	6yr/0mo	\$280.00	BWD	Above Average	Bedroom
Full Length Silver Fox Coat				1	0yr/0mo	\$7,500.00		Above Average	Closet
Sheared Mink Stroller				1	24yr/0mo	\$6,400.00		Above Average	Closet
All Weather Wicker Rocker				1	20yr/0mo	\$500.00		Above Average	Lawn / Patio / Deck
Lampshades				10	7yr/0mo	\$125.00		Above Average	Family Room
Custom Drape Rods				2	20yr/0mo	\$1,000.00		Above Average	Dining Room
Stationary Drape Panels				4	20yr/0mo	\$1,250.00		Above Average	Dining Room
Lamps				5	7yr/0mo	\$400.00		Above Average	Living Room
Rosenthal China /Service for 8				1	16yr/0mo	\$2,500.00		Above Average	Dining Room
Rosenthal Service Pieces				9	15yr/0mo	\$166.67		Above Average	Dining Room

Loss Inventory for Claim # 1737K151K Page 4 (printed 9/6/2022 2:02:13 PM UTC)

11:37

**Margaret's Movers**

I am not trying to upset  
you anymore than you  
are.

I just want to tell you first  
of all I'm sorry that this  
move wasn't stress free &  
peaceful.

Secondly, as far as claims,  
I think we can put in an  
initial claim and then  
amend if needed.  
Because it would be  
impossible for anyone to  
go through this many  
boxes in a short period of  
time.

I believe by law you have  
180 days. I'll double  
check with Donny.





11:38

**Margaret's Movers**

IS OT little consolation but I do care. We don't work as hard as we do for things to go wrong. I will do everything in my control to mitigate the situation.

Fri, Jul 29, 8:23 PM

I would like to come to the warehouse and look around for my things.

Assuming still at 7th Street. 2620? I'll be by tomorrow. What is a convenient time?

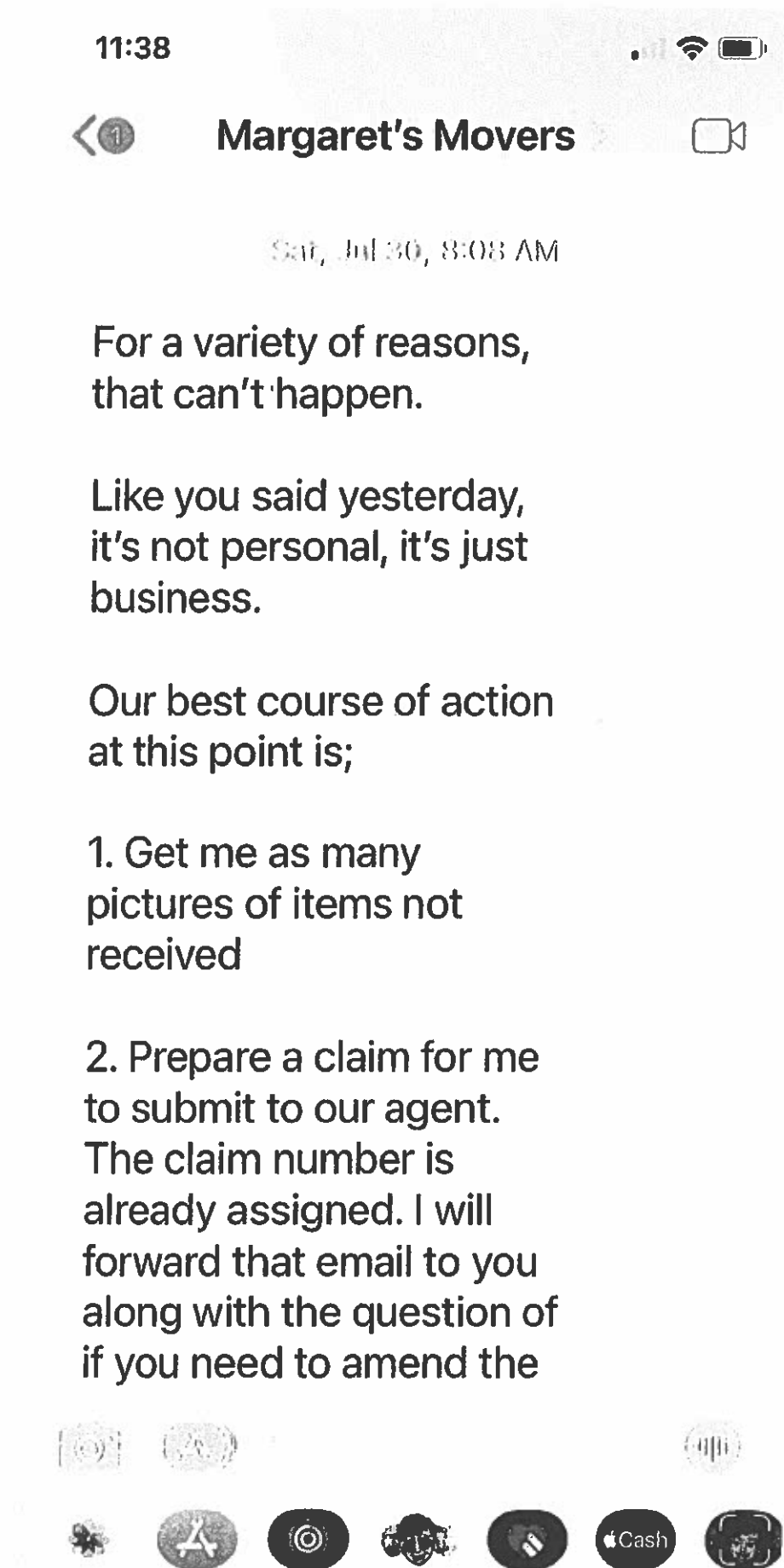
Delivered

Sat, Jul 30, 10:25 AM

Can you please answer me?

Sent as Text Message





11:38

**Margaret's Movers**

My insurance agent is Donny Anderson and he's been my agent for more than 15 years. He handles many movers in the area. He merged with Shepherd Insurance a few years ago. He has your name, address, email and phone number.

Please know that I've been stressed about this situation and I know that is of little consolation but I do care. We don't work as hard as we do for things to go wrong. I will do everything in my control to mitigate the situation.

Fri, Jul 29, 8:23 PM

I would like to come to the



11:39



## Margaret's Movers



2. Prepare a claim for me to submit to our agent. The claim number is already assigned. I will forward that email to you along with the question of if you need to amend the claim & the time frame to do that.

3. Work through your boxes to identify any claims therein.

4. I will work on my side to identify any remaining items to mitigate the claim.

5. I will find out the completion date of the items taken to be repaired and forward that to you.



11:39



## Margaret's Movers



4. I will work on my side to identify any remaining items to mitigate the claim.

5. I will find out the completion date of the items taken to be repaired and forward that to you.

6. Let me know when you need empty boxes picked up and I will get someone over to get them.

I understand you have a lot on your plate & I am doing my level best to alleviate as much of that stress as I can.

Sat, Jul 30, 10:26 AM



11:38

**Margaret's Movers**

Have answer. Didn't see this. Also looking for my Ken more canister vacuum blue and gray

iMessage  
Friday 9:47 AM

State Farm is turning down my claim. It is a huge claim. I need you to work with me on this and return their call. None of this was my fault. I have experienced so much loss over the past 5 years and I will not survive this loss. I have nothing. My life is destroyed because of this. I trusted you with everything I owned and it's gone.

Sent as Text Message



## Consumer Complaint Form Admin

### Application Information

Submission Id 941af9c1-2737-4aba-a165-238219dfb9b0

Completion Date 7/24/2019 10:09:18 AM

Name Donna Rasmussen

Address 9317 Tiverton Way

City Louisville

State KY

ZIP/Postal Code 40242

County Jefferson

Home Phone 502-231-3640

Mobile Number 502-533-1576

E-Mail donna.rasmussen05@gmail.com

Are you Active Duty Military? No

Company or person your complaint is against Margaret's Moving and Storage

Company Address 2620 Seventh Street Road

Company City Louisville

Company State KY

Company ZIP 40208

Company Phone 502-584-5234

Company E-Mail

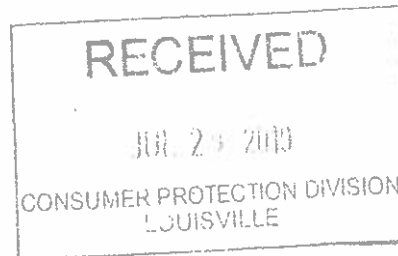
Was a contract signed? True

Date(s) of transaction 06/03/19

Product or service involved Moving company

Total Price \$2656.00

Amount Paid \$2656.00



How did you hear about this product or service? **Used them before**

With what other agencies have you filed a complaint? **Louisville Metro Police**

What action was taken by those agencies? **none so far**

Have you hired or retained an attorney? **False**

Have you started court action? **False**

What action will resolve your complaint? **Refund of service of moving.**

Briefly state the facts of your complaint **A box of jewelry was taken. Not received at new location**

Verification

4145A41B-0448-4695-B8CC-47962B677BD9 : 000044 of 000153

Presiding Judge: HON. PHILLIP J. SHEPHERD (648260)

EXH : 000023 of 000032



# CONSUMER MEDIATION REQUEST FORM

## RECEIVED

ANDY BESHEAR  
ATTORNEY GENERAL



AUG 05 2019  
Office of the Attorney General  
Office of Senior Protection and Mediation  
1024 Capital Center Drive • Frankfort, KY 40601  
Hotline: 1-888-432-9267 • FAX: 502-573-7151  
www.ag.ky.gov

TYPE OR PRINT NEATLY. SUBMIT TWO COPIES OF THE COMPLAINT AND TWO COPIES OF ANY DOCUMENTS SUBMITTED.

Name ☐ Mr ☒ Mrs ☐ Ms DONNA M. RASMUSSEN  
Address 9317 TIVERTON WAY  
City LOUISVILLE State KY Zip Code 40242 County JEFFERSON  
Home phone 502-231-8640 Work/Cell Phone 502-533-1576  
Email Address DONNA.RASMUSSEN05@GMAIL.COM

PLEASE NOTE WE ARE UNABLE TO OFFER MEDIATION SERVICES WITHOUT COMPLETE INFORMATION IN THIS SECTION.

Company your complaint is against? MARGARET'S MOVING & STORAGE  
Address 2620 SEVENTH STREET ROAD  
City LOUISVILLE State KY Zip 40208 County JEFFERSON  
Phone 502-584-5234

## RECEIVED

AUG 06 2019

Please fill in this section completely.

Was a contract signed? ☒ YES ☐ NO (If yes, please attach a copy of your contract)

Where was the contract signed? ☐ In your home ☐ At the business ☐ Other \_\_\_\_\_

Date(s) of transactions 6-3-19 Product/Service Involved MOVERS

Total Price \$ 2656.00 Amount Paid \$ 2656.00 Was product/service advertised ☐ YES ☐ NO

How was service advertised? ☐ Newspaper ☐ TV ☐ Radio ☐ Mail ☐ Phone ☐ Email ☐ Internet ☐ Other \_\_\_\_\_

With what other agencies have you filed this complaint? LMPD, AMERICAN EXPRESS

What action was taken? NONE SO FAR

Have you hired or retained a private attorney? ☐ YES ☒ NO Have you started court action? ☐ YES ☒ NO

If you have retained a private attorney or, this matter is pending before or has been decided in the courts, our office will be unable to offer mediation services.

What action will resolve your complaint? REFUND OF PAYMENT

Below, briefly state the facts of your complaint (if necessary, use additional paper). Please attach copies of any papers involved (order blanks, warranties, credit card receipts or statements, contracts, advertisements, canceled checks, etc.). The information you provide will be used in our effort to resolve your problem and may be shared with the party against which you have complained. It may also be used to enforce applicable state laws. Under Kentucky's Open Records Act, this complaint will be available for public view upon request. Certain personal information such as account numbers are not subject to the Open Records Act.

A BOX OF JEWELRY WAS TAKEN BY THE MEN WHO MOVED US. IT WAS NOT IN THE BOXES THAT WERE DELIVERED. THERE WERE 6 MEN AND 2 TRUCKS. I GAVE COMPANY A LIST OF ITEMS. THE BOX WAS WORTH \$3200. ATTACHED IS THE COMPLAINT TO MARGARETS.

I authorize that the information submitted on this consumer mediation complaint form is true and accurate to the best of my knowledge.

Signature

Date

#### AUTHORIZATION TO RELEASE INFORMATION

Please complete this section only if your complaint involves a financial institutions, mortgage/loan concerns, a debt collector, a medical provider or other issues that require a third party authorization. This is a voluntary release of information and is not required to file a mediation complaint, however in order for the business entity to disclose personal information with our office a release is needed.

The undersigned has submitted a consumer complaint and is currently working with the Kentucky Office of the Attorney General through the mediation process and hereby authorizes the company listed below (and its employees) to speak with and discuss my account/loan/mortgage on my behalf with the Kentucky Office of the Attorney General. The parties listed are each authorized to share with the other any and all information concerning my account, including but not limited to, financial information, without further authorization and until this matter is closed by the Office of the Attorney General or the Authorization is revoked.

Name of Company/Agency Authorized to Release Information \_\_\_\_\_

Account/Loan Number \_\_\_\_\_

Email address \_\_\_\_\_

#### HIPAA Privacy Authorization - Authorization for Use or Disclosure of Protected Health Information

I authorize \_\_\_\_\_ (healthcare provider) to use and disclose my protected health information to the Office of the Attorney General for use in my consumer mediation complaint.

Signature

Date

#### OPTIONAL- COMPLETION OF THIS SECTION IS VOLUNTARY

AGE OF THE PERSON INVOLVED IN THE TRANSACTION: ☐ 0-15 ☐ 16-25 ☐ 26-39 ☐ 40-59 ☐ 60-75 ☐ 76-over

The Office of the Attorney General does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or the provision of service and provides, upon request, reasonable accommodations including auxiliary aids and services necessary to afford individuals with disabilities an equal opportunity to participate in all programs and activities.

Division: 8 DISTRICT

**Incident/Investigation Report**

Beat: 815

Agency: LMPD

Case Number: 80-19-044348

Case Status: OPEN INACTIVE

**Property**

Seq. # <b>1</b>	Description SHOE BOX FULL OF COSTUME JEWELRY	Serial Number	Make/Model
Owner RASMUSSEN, DONNA	License / State	Color	
Status STOLEN/BTC	Status Officer (6862) GREEN, KEVIN S	Quantity 1.00	Units of Measure Value \$3000.00
Gun Type	Caliber	Finish	Grip
Condition	Gun Test <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Test Type	Sight Test <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Property Notes			

**Notes/Narratives****PUBLIC NARRATIVE**

Victim states that she used a moving company to move her from her old address 8904 Sidney Way to her new listed address. Victim states that workers from the moving company stole her property during the move.

4145A41B-0448-4695-B8CC-47962B677BD9 : 000047 of 000153

Presiding Judge: HON. PHILLIP J. SHEPHERD (648260)

EXH : 000026 of 000032

RECEIVED

NOV 28 2018

CONSUMER PROTECTION DIVISION

To: Office at Attorney General  
700 Capital Ave Suite 118  
Frankfort, Ky. 40601

From: Bobby D. Sewell  
12572 Spring Falls Court  
Louisville, Ky. 40229

RECEIVED

NOV 29 2018

CONSUMER PROTECTION DIVISION  
LOUISVILLE

Att: Honorable John Michael Brown

I'm sending you this complaint at the request of my attorney Oliver H. Barber Jr.

Enclosed you will find the consumer complaint form which was hard to fill out because of the nature of the complaint.

As you can see, I owned the house that Margaret's Moving company moved out the person that I bought the house from. I purchased the house on September 28, 2018 and took pictures which are included. The movers came in and damaged the floor on Oct. 2, 2018 while moving the other family out. Since I didn't hire them to move her out, the moving company claims they have no dealings with me, but I owned the house at the time.

I have made every attempt to get the moving company to fix this problem but they have done nothing thus far except tell me they are not going to do anything and for me not to call them any more and contact my lawyer.

As you can see, I have written them two times about this problem but they refuse to do anything.

I have enclosed just a few pictures of before and after which I shared with the moving company.

If this cannot be cleared up through your influence, I have no choice but to take legal action against this company for damages.

Sincerely Bobby D. Sewell Date Nov. 21, 2018

# CONSUMER COMPLAINT FORM

JACK CONWAY  
ATTORNEY GENERAL



RETURN TO:  
Office of Attorney General  
Consumer Protection Division  
310 Whittington Parkway, Suite 101  
Louisville, KY 40222  
Phone: (602) 429-7134  
Fax: (602) 429-7129  
Hotline: (888) 432-9267  
www.ag.ky.gov/cp

TYPE OR PRINT NEATLY. SUBMIT TWO COPIES OF THE COMPLAINT AND TWO COPIES OF ANY DOCUMENTS SUBMITTED.

YOUR NAME ☒ Mr ☐ Mrs ☐ Ms Bobby D. Sewell  
ADDRESS 12572 Spring Falls Court  
CITY Louisville STATE KY ZIP CODE 40229 COUNTY Bullitt  
HOME PHONE 502-277-1492 WORK/CELL PHONE 502-649-1935  
EMAIL ADDRESS: bdsew74@gmail.com

COMPANY OR PERSON(S) YOUR COMPLAINT IS AGAINST Margaret's moving & storage  
ADDRESS 2620 7th St. Rd  
CITY Louisville STATE Kentucky ZIP CODE 40208  
PHONE: 502-584-5234

Please fill in this section completely.

WAS A CONTRACT SIGNED? ☐ YES ☐ NO (If Yes, Please Attach a Copy of Your Contract.)

WHERE WAS CONTRACT SIGNED? ☒ IN YOUR HOME ☐ AT THE BUSINESS ☐ OTHER \_\_\_\_\_

DATE(S) OF TRANSACTION Oct 2, 2018 PRODUCT OR SERVICE INVOLVED Damaged Floor

TOTAL PRICE \$7421.18 AMOUNT PAID \_\_\_\_\_ WAS PRODUCT/SERVICE ADVERTISED? ☐ YES ☐ NO

HOW WAS SERVICE ADVERTISED? ☐ Newspaper ☐ TV ☐ Radio ☒ Mail ☐ Phone ☐ Email ☐ Internet ☐ Other \_\_\_\_\_

WITH WHAT OTHER AGENCIES HAVE YOU FILED THIS COMPLAINT? BBB - yelp

WHAT ACTION WAS TAKEN? 3 Flooring people have looked at floor & stated it can't be repaired, it must be replaced.

HAVE YOU HIRED OR RETAINED A PRIVATE ATTORNEY? ☒ YES ☐ NO HAVE YOU STARTED COURT ACTION? ☐ YES ☒ NO

WHAT ACTION WILL RESOLVE YOUR COMPLAINT? The Floor must be replaced but moving company refuses to do anything about it.

Below, briefly state the facts of your complaint (If necessary, use additional paper). Please attach copies of any papers involved (order blanks, warranties, credit card receipts or statements, contracts, advertisements, canceled checks, etc.). The information you provide will be used in our effort to resolve your problem and may be shared with the party against which you have complained. It may also be used to enforce applicable state laws. Under Kentucky's Open Records Act, this complaint will be available for public view upon request. Certain personal information such as account numbers are not subject to the Open Records Act.

I purchased a patio home on Sept. 28, 2018. I and my realtor took pictures of the house inside, especially the high-gloss finished flooring. The floor was in great shape which was a selling point. Margaret's moving co. moved the person out of the house on Oct. 2, 2018 severely damaging the floor with long scrapes, gouges all the way through the finish into the wood. The person that moved out of the house stated that the movers damaged the floor.

I contacted the moving company. They said they would look into it. I called numerous times but they would not answer or the secretary would say they were not available.

After several weeks stormy weathers called, saying he was 1/2 owner of the company. I ask him to come look at the floor. Finally he came & brought a flooring person with him. This flooring person stated to both of us that the floor could not be repaired but had to be replaced. Stormy Weathers sent another guy out and he said the same thing. I had a flooring co. come out for an estimate. Can't be repaired. Cost to replace is \$17,421.18. Mr. Weathers refuses to do anything and told me not to call him anymore, that he was not going to replace the floor and to call my lawyer and hung up the phone.

If Your Complaint Is Regarding a Health Club Membership, Also Complete this Section.

WAS CONTRACT SIGNED? ☐ YES ☐ NO DATE OF CONTRACT \_\_\_\_\_ LENGTH OF CONTRACT: YEARS \_\_\_\_\_ MONTHS \_\_\_\_\_

TIME LEFT BEFORE CONTRACT EXPIRES: YEARS \_\_\_\_\_ MONTHS \_\_\_\_\_

TOTAL AMOUNT OF YOUR CONTRACT: \$ \_\_\_\_\_ AMOUNT PAID TO DATE: \$ \_\_\_\_\_

HOW WERE YOUR PAYMENTS TO BE MADE? ☐ MONTHLY ☐ YEARLY ☐ OTHER

AMOUNT OF EACH PAYMENT? \$ \_\_\_\_\_ WHEN WAS YOUR LAST PAYMENT? \_\_\_\_\_

HAVE YOU MADE PAYMENTS TO ANY COMPANY OTHER THAN THIS HEALTH CLUB? ☐ YES ☐ NO

If yes, please provide the following information:

NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

The above information is true and accurate to the best of my knowledge.

TODAY'S DATE Nov. 21, 2018 YOUR SIGNATURE Solby D. Swell

OPTIONAL- COMPLETION OF THIS SECTION IS VOLUNTARY

AGE OF THE PERSON INVOLVED IN THE TRANSACTION: ☐ 0-15 ☐ 16-25 ☐ 26-39 ☐ 40-59 ☐ 60-75 ☐ 76-over

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# CONSUMER COMPLAINT FORM

ANDY BESHEAR  
ATTORNEY GENERAL



RETURN TO:  
Office of Attorney General  
Consumer Protection Division  
310 Whittington Parkway, Suite 101  
Louisville, KY 40222  
Phone: (502) 429-7134  
Fax: (502) 429-7129  
Hotline: (888) 432-9257  
www.ag.ky.gov/cp

**TYPE OR PRINT NEATLY. SUBMIT TWO COPIES OF THE COMPLAINT AND TWO COPIES OF ANY DOCUMENTS SUBMITTED.**

YOUR NAME ☒ Mr ☐ Mrs ☐ Ms Kurt Reibling  
ADDRESS 7216 Edmonson Place  
CITY Prospect STATE KY ZIP CODE 40059 COUNTY Jefferson  
CELL PHONE 502-649-5468 WORK PHONE 502-855-3911  
EMAIL ADDRESS: KReibling@Reibling-LLC.com

COMPANY OR PERSON(S) YOUR COMPLAINT IS AGAINST Margaret's Moving & Storage  
ADDRESS 2620 Seventh Street  
CITY Louisville STATE KY ZIP CODE 40208  
PHONE: 502-584-5234

*Please fill in this section completely.*

WAS A CONTRACT SIGNED? ☐ YES ☒ NO (If Yes, Please Attach a Copy of Your Contract.)

WHERE WAS CONTRACT SIGNED? ☐ IN YOUR HOME ☐ AT THE BUSINESS ☐ OTHER \_\_\_\_\_

DATE(S) OF TRANSACTION 11/11/16 11/13/16 11/16/16 PRODUCT OR SERVICE INVOLVED Residential Move

TOTAL PRICE \$1,883.00 AMOUNT PAID \$1,883.00 WAS PRODUCT/SERVICE ADVERTISED? ☒ YES ☐ NO

HOW WAS SERVICE ADVERTISED? ☐ Newspaper ☒ TV ☒ Radio ☒ Mail ☐ Phone ☐ Email ☒ Internet ☐ Other \_\_\_\_\_

WITH WHAT OTHER AGENCIES HAVE YOU FILED THIS COMPLAINT? MARGARET'S MOVERS (see attached claim)

WHAT ACTION WAS TAKEN? NONE

HAVE YOU HIRED OR RETAINED A PRIVATE ATTORNEY? ☐ YES ☒ NO HAVE YOU STARTED COURT ACTION? ☐ YES ☒ NO

WHAT ACTION WILL RESOLVE YOUR COMPLAINT? For Margaret's Moving & Storage to repair damages and reimburse me

for destroyed items. Damages incurred at Origin Address of 18731 Willington Circle, Louisville, KY 40245 & Destination Address of  
7216 Edmonson Place, Prospect, KY 40059

Below, briefly state the facts of your complaint (if necessary, use additional paper). Please attach copies of any papers involved (order blanks, warranties, credit card receipts or statements, contracts, advertisements, canceled checks, etc.). The information you provide will be used in our effort to resolve your problem and may be shared with the party against which you have complained. It may also be used to enforce applicable state laws. Under Kentucky's Open Records Act, this complaint will be available for public view upon request. Certain personal information such as account numbers are not subject to the Open Records Act.

	Description of article	Description of Damages	Did Margaret's pack this item?	Estimated Weight	Original Cost	Date Acquired	Amount Claimed
	<b>Origin Address:</b> Large Glass Vase	Broken by Tevin. Witnessed by Jimmy	No. It was sitting on the kitchen desk.	5 lbs	\$50.00	6/7/15	\$50.00
	<b>Origin Address:</b> 2 <sup>nd</sup> Floor & Stairwell Walls, 1 <sup>st</sup> Floor Ceiling	Scratches, dents. Marring by washing machine hose, blood on walls from Trey	Yes	N/A	\$1,500	Painted 9/2/16	\$820.00
	<b>Destination Address:</b> 1 <sup>st</sup> door floor, laundry room hallway walls, stairwell walls	Scratches, dents. Marring by washing machine hose. Garage wall punctured by Alex while pounding on work bench top	Yes	N/A	\$3,200	Painted 10/30/16	\$1,288
	Picture frame	Broken	Yes	N/A	\$50	N/A	\$50
	Birdhouse perch	Perch broken		N/A	\$50	03/05/15	\$50



**If Your Complaint is Regarding a Health Club Membership, Also Complete this Section.**WAS CONTRACT SIGNED? ☐ YES ☐ NO DATE OF CONTRACT \_\_\_\_\_ LENGTH OF CONTRACT: YEARS \_\_\_\_\_ MONTHS \_\_\_\_\_

TIME LEFT BEFORE CONTRACT EXPIRES: YEARS \_\_\_\_\_ MONTHS \_\_\_\_\_

TOTAL AMOUNT OF YOUR CONTRACT \$ \_\_\_\_\_ AMOUNT PAID TO DATE: \$ \_\_\_\_\_

HOW WERE YOUR PAYMENTS TO BE MADE? ☐ MONTHLY ☐ YEARLY ☐ OTHER

AMOUNT OF EACH PAYMENT? \$ \_\_\_\_\_ WHEN WAS YOUR LAST PAYMENT? \_\_\_\_\_

HAVE YOU MADE PAYMENTS TO ANY COMPANY OTHER THAN THIS HEALTH CLUB? ☐ YES ☐ NO

If yes, please provide the following information:

NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

The above information is true and accurate to the best of my knowledge.

TODAY'S DATE 04/19/17

YOUR SIGNATURE

**OPTIONAL- COMPLETION OF THIS SECTION IS****VOLUNTARY**AGE OF THE PERSON INVOLVED IN THE TRANSACTION: ☐ 0-15 ☐ 16-25 ☐ 26-39 ☐ 40-59 ☐ 60-75 ☐ 76-over

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COMMONWEALTH OF KENTUCKY  
OFFICE OF THE ATTORNEY GENERAL

DANIEL CAMERON  
ATTORNEY GENERAL

1024 CAPITAL CENTER DRIVE  
SUITE 200  
FRANKFORT, KY 40601

**SUBPOENA AND CIVIL INVESTIGATIVE DEMAND  
IN RE INVESTIGATION OF:**

**Unlawful Business Practices**

**TO: Margaret's Mover's, Inc. D/B/A Margaret's Moving and Storage**  
1611 Hill Street, Suite J  
Louisville, KY 40210

**SERVE:**

**Registered Agent:**  
Margaret Weathers  
2904 Virginia Ave.  
Louisville, KY 40211

Pursuant to the authority granted in KRS 367.240 and 367.250, the Attorney General of Kentucky, having reason to believe that a person has engaged in, is engaging in, or is about to engage in any act or practice declared to be unlawful by KRS 367.110 to 367.300; or having reason to believe it is in the public interest that an investigation should be made to ascertain whether a person in fact has engaged in, is engaging in or is about to engage in, any act or practice declared to be unlawful by KRS 367.110 to 367.300; or both, hereby executes this Subpoena and Civil Investigative Demand, as follows:

\_\_\_\_\_ That Margaret's Mover's, Inc. D/B/A Margaret's Moving and Storage furnish, under oath or affirmation, a report in writing setting forth the relevant facts and circumstances of which Margaret's Mover's, Inc. D/B/A Margaret's Moving and Storage, has knowledge.

\_\_\_\_\_ That Margaret's Mover's, Inc. D/B/A Margaret's Moving and Storage personally appear and testify at the following location on the following date and time:

X \_\_\_\_\_ That, under oath or affirmation, Margaret's Mover's, Inc. D/B/A Margaret's Moving and Storage, answer the following requests and produce the following documents at the time and place above or, if blank, then by sending them together with a completed sworn statement of authenticity and completeness of documents, by no later than twenty (20) days following service of this Subpoena and Civil Investigative Demand to: [sarah.telle@ky.gov](mailto:sarah.telle@ky.gov)

**Office of the Attorney General of Kentucky****ATTN: Sarah Telle****1024 Capital Center Drive****Suite 200****Frankfort, KY 40601**

Failure to comply with this Subpoena and Investigative Demand may result in legal action pursuant to KRS 367.290. Intentional concealment, falsification or destruction of documents may be punishable as a class A misdemeanor under KRS 367.990(3). It is a class D felony to intentionally destroy, mutilate, conceal, remove, alter, or fabricate physical evidence believing that an official proceeding may be pending or instituted, pursuant to KRS 524.100.

Date Issued: October 27, 2022

DANIEL CAMERON  
ATTORNEY GENERAL

By: \_\_\_\_\_



Sarah A. Telle (KBA No. 98618)  
Kentucky Office of the Attorney General  
1024 Capital Center Drive  
Frankfort, KY 40601  
502-696-5591  
Email: [sarah.telle@ky.gov](mailto:sarah.telle@ky.gov)

**SERVICE OF SUBPOENA AND CIVIL INVESTIGATIVE DEMAND**

Served via:      x              1. Certified mail, return receipt requested.  
                                    2. Personal delivery  
                                    3. Fax

**ATTACHMENT TO SUBPOENA AND CIVIL INVESTIGATIVE DEMAND**

## DEFINITIONS AND INSTRUCTIONS

### DEFINITIONS

**Affiliated** means having a a contractual or professional business relationship whereby the Business Entity works with or for MM. It includes, but is not limited to, a Business Entity owned in whole or in part by MM or its principal(s).

**“Agreement”** means any oral or written agreement to provide goods or services to a customer, including, but not limited to, installing cabins and/or sheds, in exchange for consideration, monetary or otherwise. The term includes all communications forming part of the agreement, including, but not limited to, oral, electronic, graphic, and handwritten communications, and includes the agreement itself as well as any oral or written amendments, modifications, and addendums.

**“Business Entity”** refers to any entity organized for the carrying on of commercial activity, including, but not limited to, a corporation, partnership, limited liability company (LLC), and sole proprietorship. The term includes entities registered with the Kentucky Secretary of State, other governmental agencies, and unregistered entities.

**“Concerning”** or **“relating to”** means referring to, describing, evidencing, or constituting, or in any way pertaining to.

**“Document”** refers to any record of information of any type, including written, electronic, graphic, handwritten, etc. It includes but is not limited to invoices, receipts, notes, email and correspondence.

**“Goods”** generally refers to all things which are moveable at the time of identification for an advertisement, offer, charge for, sale or fulfillment of goods.

**“Identify”** with respect to a person or company means to list name of contact person, name of company, address and phone number. With respect to a document, “identify” means to list the date, title, type (letter, email, invoice, etc.), author and recipients. For documents that are provided to the Attorney General’s office with MM’s, responses, and indicated as responsive to a specific numbered question, MM, does not need to list all the identifying information. “Identify” in all other respects means to describe in specific detail.

**“MM”** refers to Margaret’s Movers and Storage, regardless of whether the entity is registered with the Kentucky Secretary of State, some other governmental agency, or unregistered, and includes sole proprietorships and assumed names.

**“Response Date”** means the date MM substantively and completely responds to this CID and Subpoena.

**INSTRUCTIONS**

- a. Answer each request separately and fully in writing and under oath.
- b. As a convenience, defined terms may be capitalized and/or in bold font, but the presence or absence of capitalization or bold font does not alter or reduce the meaning of such terms.
- c. In answering the requests, furnish all information or documents known by MM, or available to MM, or in MM's, possession, direction, custody or control, regardless of how the information was obtained or whether such information is hearsay or otherwise admissible evidence.
- d. Exercise due diligence in answering each request and securing all information with which to answer each request. If MM cannot answer a request fully and completely after exercising due diligence, then answer the request to the extent possible, specifying the basis for MM's, inability to answer the remainder and detailing MM's, attempts to secure the unknown information.
- e. A request that seeks information contained in whole or in part within a document, or that seeks the identification of any document, may be answered by furnishing a copy of such document, identifying the document and specifying the portion(s) of the document containing the requested information.
- f. All answers should include attachments of as many pages as are necessary to fully and completely respond and should be identified by the number corresponding to each request as set forth below.
- g. All requests relate to all employees, agents, representatives, successors, assigns, principals, officers and directors, jointly and severally, while acting personally, or through the corporation or any other Business Entity or form, whose acts, practices, or policies are directed, formulated or controlled by MM.
- h. Documents produced in response to the CID and Subpoena must be bates-labeled using a naming convention that clearly identifies the producing party (e.g., MM\_0000001).
- i. If You contend that any Document that is responsive to any request in this CID and Subpoena is privileged and, therefore, exempt from production, please produce a privilege log providing sufficient information for the Attorney General to evaluate the claim of privilege. Please also identify in your response that Documents responsive to any request are being withheld on the basis of a privilege.
- j. If a Request calls for the production of documents, include in the specific written response to that Request the specific bates range of documents that are responsive.

### REQUESTS

1. Identify all Business Entities affiliated with MM.
2. Identify all assumed names under which MM conduct(s) business operations regardless of whether the assumed name is registered with the Kentucky Secretary of State, some other governmental agency, or unregistered.
3. State the goods and services provided by MM and any affiliated Business Entity identified in response to the foregoing Requests Nos. 1 and 2 and separately identify the specific goods and services provided by each entity.
4. State the location in (State, City and/or County) in which MM conducts business operations and separately identify the specific location(s) where each Business Entity operates.
5. Identify all current and former:
  - a. members;
  - b. managing members;
  - c. directors;
  - d. officers;
  - e. employees; and
  - f. agents;

of MM and separately identify the position/title held by each individual and the individual's corresponding duties and responsibilities.

6. Identify all current and former owners (including natural persons and entities) of MM, and separately identify their ownership interest in each Business Entity and any duties and responsibilities within each entity.
7. Identify all Agreements that MM has entered into with customers to provide good(s) and/or service(s) including Agreements to move and/or store items from January 1, 2019 to the Response Date.
8. For all Agreements identified in response to Request No. 7 in which either MM failed to complete the Agreements or any individual has alleged that MM failed to complete the Agreements, state the reason why:
  - a. MM failed to perform its obligations within the initial time period called for by the Agreement; and/or
  - b. MM failed to completely perform its obligations specified in the Agreement for any reason, including, but not limited to, loss of customers' belongings and failure to provide the goods and services specified in the Agreement. If MM contends that, notwithstanding the customer's allegations, it did fully perform its obligations

under the Agreement, state all facts and Identify all witnesses and produce all Documents that support this contention.

9. Produce all Agreements identified in response to Request No. 8.
10. For all Agreements identified in Response to Request No. 8, state whether MM ever completely performed its obligations under the Agreement, and if so, provide the date on which MM completed performance and identify all witnesses and produce any Documents supporting the fact that MM fulfilled its obligations.
11. Please identify all locations where MM has stored customers items since January 1, 2015.
12. Produce any communication with customers wherein MM lost items or items were broken during a move.
13. Identify and produce all consumer complaints made by customers to MM concerning MM's performance, or lack thereof, including complaints that lists missing or damaged property of customers, cancellation requests, and status updates on their move or stored property.
14. Identify and produce all Documents concerning or relating to MM's response to the complaints identified in response to Request No. 13, including any Documents showing refunds paid by MM or showing MM otherwise responded to the missing or damaged property claims.
15. For each instance where MM failed to fulfill a customer's complaint, cancellation request, or concern about the status of their move or storage identified in Request No. 13, state the reason why MM was unable to fulfill the customer's complaint or request of the applicable Agreement.
16. Produce all Documents relating to marketing or advertising conducted by MM between January 1, 2019 to the Response Date.
17. Identify and describe the relationship, if any, between MM and the following:
  - a. Stormy Elizabeth Properties LLC;
  - b. Stormy Elizabeth Properties, LLC;
  - c. A Better System, LLC;
  - d. A Better Maid Service LLC;
  - e. A Better Maid Service;
  - f. BAMN Enterprises, Limited Liability Company; and
  - g. Margaret's Temps, Limited Liability Company.
18. Identify and describe the relationship, if any, between MM, or any affiliated Business Entity, and the following individuals:

- a. Jackie Evans;
  - b. Donna Rasmussen;
  - c. Kimberly Smith;
  - d. Bobby D. Sewell;
  - e. Kurt Reibling; and
19. Explain and provide all documentation of your dealings with any individual listed in No. 18, including, but not limited to, an accounting of what happened to any missing items or damaged property. Specifically, were the items recovered and/or repaired or were the owners compensated for their lost or damaged property?
20. Produce all Documents MM has identified in response to the Requests above or that it has otherwise relied upon in responding to these Requests.

**There is a continuing obligation to disclose pursuant to this CID.**



**VERIFICATION**

I, \_\_\_\_\_, am employed by Margaret's Mover's, Inc. D/B/A Margaret's Moving and Storage (MM), as a \_\_\_\_\_ and am authorized to give this Verification on behalf of MM. I execute this verification and state the following under penalty of perjury under the laws of the Commonwealth of Kentucky.

I have read MM's objections and responses to the Civil Investigative Demand and Subpoena issued on October 27, 2022, and state that the factual matters set forth in the responses are true, correct, and complete to the best of my knowledge, information and belief.

Further, I, \_\_\_\_\_, certify that records and documents produced herein were made at or near the time of the occurrence of the matters set forth by (or from information transmitted by) a person with knowledge of those matters in the course of a regularly conducted business activity, were kept in the course of the regularly conducted activity, and were made by the regularly conducted activity as a regular practice.

Signature: \_\_\_\_\_

**To Be Completed By Notary**

STATE OF \_\_\_\_\_ )  
COUNTY OF \_\_\_\_\_ )

Subscribed, sworn to and acknowledged before me by \_\_\_\_\_  
(name), \_\_\_\_\_(title), on behalf of \_\_\_\_\_, on  
\_\_\_\_\_, \_\_\_\_.

My Commission expires: \_\_\_\_\_.

Signature: \_\_\_\_\_  
Print Name: \_\_\_\_\_  
Title: \_\_\_\_\_

IN RE INVESTIGATION OF:

Margaret's Movers, Inc. d/b/a  
Margaret's Moving and Storage

**RESPONSE OF MARGARET'S MOVERS, INC. TO  
SUBPOENA AND INVESTIGATIVE DEMAND**

Respondent, Margaret's Movers, Inc. (hereinafter "Respondent"), by counsel, responds to the Subpoena and Civil Investigative Demand and requests attached thereto (the "Requests") served by the Office of the Kentucky Attorney General, as follows:

**GENERAL OBJECTIONS**

1. Respondent objects to the Requests to the extent that they seek information and documents which are protected by the attorney-client privilege and/or work product doctrine.
2. Respondent objects to the Requests to the extent that they seek a description of oral communications Respondent may have knowledge about on the grounds that the Requests are overly broad, unduly burdensome, oppressive, and, as a practical matter, impossible to answer.
3. Respondent objects to the Requests to the extent that they purport to impose any obligation on Respondent greater than the obligations imposed by the applicable rules of civil procedure.
4. Respondent objects to the Requests to the extent that they seek confidential or proprietary information.
5. Respondent objects to the Requests to the extent they seek information that is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

6. Respondent objects to the Requests to the extent that they serve no other purpose than harassment and/or embarrassment. Respondent reserves the right to supplement and/or amend these responses at a later date upon the discovery of responsive, relevant information.

### **REQUESTS**

**REQUEST NO. 1:** Identify all Business Entities affiliated with MM.

**RESPONSE:** Margaret's Movers, Inc., d/b/a Margaret's Moving & Storage.

**REQUEST NO. 2:** Identify all assumed names under which MM conduct(s) business operations regardless of whether the assumed name is registered with the Kentucky Secretary of State, some other governmental agency, or unregistered.

**RESPONSE:** Margaret's Moving & Storage

**REQUEST NO. 3:** State the goods and services provided by MM and any affiliated Business Entity identified in response to the foregoing Requests Nos. 1 and 2 and separately identify the specific goods and services provided by each entity.

**RESPONSE:** Respondent operates a residential and commercial moving and storage company. Specifically, Respondent packs, moves and stores customers' personal property.

**REQUEST NO. 4:** State the location (State, City and/or County) in which MM conducts business operations and separately identify the specific location(s) where each Business Entity operates.

**RESPONSE:** Respondent is based in Louisville, Kentucky and primarily operates in Jefferson County, Kentucky, and surrounding counties. In addition to Kentucky, Respondent also operates in the 47 other United States.

**REQUEST NO. 5:** Identify all current and former:

- a. members;
- b. managing members;
- c. directors;
- d. officers;
- e. employees; and
- f. agents

of MM and separately identify the position/title held by each individual and the individual's corresponding duties and responsibilities.

**RESPONSE:** (a) Margaret Weathers and Arthur Weathers;

(b) Margaret Weathers and Arthur Weathers;

(c) Margaret Weathers and Arthur Weathers;

(d) Margaret Weathers and Arthur Weathers;

(e) Margaret Weathers, Arthur Weathers, Victor Cody and Mike Campbell;

(f) None.

**REQUEST NO. 6:** Identify all current and former owners (including natural persons and entities) of MM, and separately identify their ownership interest in each Business Entity and any duties and responsibilities within each entity.

**RESPONSE:** Margaret Weathers and Arthur Weathers each owns a 50% ownership interest in Respondent. Margaret Weathers manages Respondent's administration and Arthur Weathers manages Respondent's operations.

**REQUEST NO. 7:** Identify all Agreements that MM has entered into with customers to provide good(s) and/or service(s) including Agreements to move and/or store items from January 1, 2019 to the Response Date.

**RESPONSE:** Objection. Request No. 7 is overbroad and unduly burdensome on Respondent. Subject to and without waiving its objection, Respondent states that the software program it began using in 2011, Mr. Mover, was acquired by "Mover HQ" and ceased supporting the server-based Mr. Mover platform in December 2021. Accordingly, Respondent lacks the ability to retrieve files from Mr. Mover prior to December 2021. Respondent is continuing to search its paper files and will supplement this Request if responsive documents are discovered.

**REQUEST NO. 8:** For all Agreements identified in response to Request No. 7 in which either MM failed to complete the Agreements or any individual has alleged that MM failed to complete the Agreements, state the reason why:

a. MM failed to perform its obligations within the initial time period called for by the Agreement; and/or

b. MM failed to completely perform its obligations specified in the Agreement for any reason, including, but not limited to, loss of customers' belongings and failure to provide the goods and services specified in the Agreement. If MM contends that, notwithstanding the customer's allegations, it did fully perform its obligations under the

Agreement, state all facts and Identify all witnesses and produce all Documents that support this contention.

**RESPONSE:** See Response to Request No. 7.

**REQUEST NO. 9:** Produce all Agreements identified in response to Request No. 8.

**RESPONSE:** See Responses to Request Nos. 7 and 8.

**REQUEST NO. 10:** For all Agreements identified in Response to Request No. 8, state whether MM ever completely performed its obligations under the Agreement, and if so, provide the date on which MM completed performance and identify all witnesses and produce any Documents supporting the fact that MM fulfilled its obligations.

**RESPONSE:** See Responses to Request Nos. 7, 8 and 9.

**REQUEST NO. 11:** Please identify all locations where MM has stored customers items since January 1, 2015.

**RESPONSE:** 2620 Seventh Street Road, Louisville, KY 40208;

1661 West Hill Street, Louisville, KY 40210; and

104 E. Breckinridge Street, Louisville, KY 40203

**REQUEST NO. 12:** Produce any communication with customers wherein MM lost items or items were broken during a move.

**RESPONSE:** Respondent is continuing to search its paper records and will supplement this Request if responsive documents are discovered.

**REQUEST NO. 13:** Identify and produce all consumer complaints made by customers to MM concerning MM's performance, or lack thereof, including complaints

that lists missing or damaged property of customers, cancellation requests, and status updates on their move or stored property.

**RESPONSE:** Respondent is continuing to search its paper records and will supplement this Request if responsive documents are discovered.

**REQUEST NO. 14:** Identify and produce all Documents concerning or relating to MM's response to the complaints identified in response to Request No. 13, including any Documents showing refunds paid by MM or showing MM otherwise responded to the missing or damaged property claims.

**RESPONSE:** Respondent is continuing to search its paper records and will supplement this Request if responsive documents are discovered.

**REQUEST NO. 15:** For each instance where MM failed to fulfill a customer's complaint, cancellation request, or concern about the status of their move or storage identified in Request No. 13, state the reason why MM was unable to fulfill the customer's complaint or request of the applicable Agreement.

**RESPONSE:** Respondent is continuing to search its paper records and will supplement this Request if responsive documents are discovered.

**REQUEST NO. 16:** Produce all Documents relating to marketing or advertising conducted by MM between January 1, 2019 to the Response Date.

**RESPONSE:** Respondent is continuing to search its paper records and will supplement this Request if responsive documents are discovered.

**REQUEST NO. 17:** Identify and describe the relationship, if any, between MM and the following:

- a. Stormy Elizabeth Properties LLC;
- b. Stormy Elizabeth Properties, LLC;
- c. A Better System, LLC;
- d. A Better Maid Service LLC;
- e. A Better Maid Service;
- f. BAMN Enterprises, Limited Liability Company; and
- g. Margaret's Temps, Limited Liability Company.

**RESPONSE:** (a) Respondent has no relationship with Stormy Elizabeth Properties LLC. Respondent's members, Margaret Weathers and Arthur Weathers, were members of Stormy Elizabeth Properties LLC, which was organized to invest in real estate. Respondent has never had any ownership interest in, or control over, that entity. According to the Kentucky Secretary of State, Stormy Elizabeth Properties LLC was administratively dissolved on November 2, 2010.

(b) Respondent has no relationship to Stormy Elizabeth Properties, LLC. Respondent's members, Margaret Weathers and Arthur Weathers, were members of Stormy Elizabeth Properties, LLC, which was organized to invest in real estate. Respondent has never had any ownership interest in, or control over, that entity. According to the Kentucky Secretary of State, Stormy Elizabeth Properties, LLC was administratively dissolved on October 12, 2015.

(c) Respondent has no relationship with A Better System, LLC.

(d) Respondent has no relationship with A Better Maid Service, LLC. Respondent's members, Margaret Weathers and Arthur Weathers, were members of A



Better Maid Service, LLC, which was organized to operate as a cleaning service. Respondent has never had any ownership interest in, or control over, that entity. According to the Kentucky Secretary of State, A Better Maid Service, LLC was administratively dissolved on November 1, 2008.

(e) A Better Maid Service was an assumed name of A Better Maid Service, LLC. Respondent's answer to Request No. 17(d) is incorporated herein by reference.

(f) BAMN Enterprises, Limited Liability Company is Respondent's predecessor in interest, and was the business entity under which Respondent operated until January 1, 2013.

(g) Margaret's Temps, Limited Liability Company was the operating name for Respondent's moving and storage business at the time of Respondent's inception.

**REQUEST NO. 18:** Identify and describe the relationship, if any, between MM, or any affiliated Business Entity, and the following individuals:

- a. Jackie Evans;
- b. Donna Rasmussen;
- c. Kimberly Smith;
- d. Bobby D. Sewell; and
- e. Kurt Reibling.

**RESPONSE:** (a) Jackie Evans: Respondent was called for a quote by Ms. Evans then-husband and was continually told he would call back to schedule. The day that the goods were placed on the lawn due to eviction, 7/13/2017, Respondent was called to also pack, move & store those items. Respondent placed those items in storage from 7/13/2017 to 8/14/2018. Respondent did not charge Jackie Evans any storage fees due to

her financial situation as her sister had to pay her moving invoice. Once Ms. Evans decided she needed to go through her goods and sell them Respondent started to bring her pallets of her goods so that she could go through them. Jackie Evans stated she was missing a blue loveseat or similar item. Margaret Weathers explained that Respondent picked her items up from the front lawn in an emergency situation and there is no documentation of this item. Further, Respondent delivered these items to Ms. Evans' friend's warehouse for unloading, therefore Respondent was not in care and control of the items from start to finish. Respondent allowed Ms. Evans to look around the warehouse to her satisfaction. Respondent provided a year of storage at the cost of \$840/month to total \$10,080 at no charge to Jackie Evans.

(b) Donna Rasmussen: Ms. Rasmussen was a repeat customer who moved on 6/3/2019. She claimed a small shoe box of costume jewelry was taken. Respondent sent Ms. Rasmussen a claim form. Ms. Rasmussen also filed a complaint with the Attorney General, to which Respondent responded to on 8/30/2019. Respondent asked Ms. Rasmussen for further information and would work toward a mutually satisfactory resolution. No further communication was received in Respondent's office.

(c) Kimberly Smith: Ms. Smith was a customer who retained Respondent the day prior to eviction/set-out. Respondent loaded up and brought her items to Respondent's storage facility.

(d) Bobby Sewell: Mr. Sewell was not Respondent's customer. He purchased the home of Respondent's customer. Margaret Weathers responded to the

Attorney General inquiry on 2/13/19. In review of Mr. Sewell's claim, the flooring was a substandard quality and no longer made. Mr. Sewell wanted the entire floor replaced to which Respondent did not agree. Respondent offered a repair settlement, which Mr. Sewell declined. In moving the previous owner out of the home, the previous owner did not request flooring protection as outlined in Respondent's response 2/13/2019.

(e) Kurt Reibling: Mr. Reibling conducted four (5) moves with Respondent. Respondent paid a claim of \$2,258.00 and proof of the cashed check was sent with the Respondent's response to the Kentucky Attorney General on 5/13/17.

**REQUEST NO. 19:** Explain and provide all documentation of your dealings with any individual listed in No. 18, including, but not limited to, an accounting of what happened to any missing items or damaged property. Specifically, were the items recovered and/or repaired or were the owners compensated for their lost or damaged property?

**RESPONSE:** See responses to each subparagraph of Request No. 18 above. Additionally, Respondent is continuing to search for responsive documents and will supplement this response if responsive documents are discovered.

**REQUEST NO. 20:** Produce all Documents MM has identified in response to the Requests above or that it has otherwise relied upon in responding to these Requests.

**RESPONSE:** Respondent is continuing to search for responsive documents and will supplement this response if responsive documents are discovered.

VERIFICATION

I, Margaret Weathers, am employed by Margaret's Mover's, Inc. D/B/A Margaret's Moving and Storage (MM), as its President and am authorized to give this Verification on behalf of MM. I execute this verification and state the following under penalty of perjury under the laws of the Commonwealth of Kentucky.

I have read MM's objections and responses to the Civil Investigative Demand and Subpoena issued on October 27, 2022, and state that the factual matters set forth in the responses are true, correct, and complete to the best of my knowledge, information and belief.

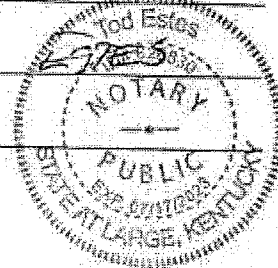
Further, I, Margaret Weathers, certify that records and documents produced herein were made at or near the time of the occurrence of the matters set forth by (or from information transmitted by) a person with knowledge of those matters in the course of a regularly conducted business activity, were kept in the course of the regularly conducted activity, and were made by the regularly conducted activity as a regular practice.

Signature: Margaret WeathersTo Be Completed By Notary

COMMONWEALTH OF KENTUCKY )

COUNTY OF JEFFERSON )

Subscribed, sworn to and acknowledged before me by MARGARET WEATHERS  
 (name), PRESIDENT (title), on behalf of MARGARET'S MOVERS  
 on JAN 9TH, 2023

My Commission expires: 7/17/23Signature: Tod EstesPrint Name: TodTitle: NOTARY

Respectfully submitted,

/s/ Michael W. McClain

Michael W. McClain (KBA No. 89396)

GOLDBERG SIMPSON LLC

Norton Commons

9301 Dayflower Street

Prospect, KY 40059

Main: 502.589.4440; Direct: 502.585.8561

Fax: 502.410.0528

mmclain@goldbergsimpson.com

*Counsel for Respondent, Margaret's Movers, Inc.*

### CERTIFICATE OF SERVICE

It is hereby certified that on January 9, 2023, a copy of the foregoing was served via electronic mail and/or regular U.S. Mail, on the following:

Sarah A. Telle, Esq.  
Kentucky Office of the Attorney General  
1024 Capital Center Drive  
Frankfort, KY 40601  
Sarah.telle@ky.gov

/s/ Michael W. McClain

*Counsel for Respondent*



COMMONWEALTH OF KENTUCKY  
OFFICE OF THE ATTORNEY GENERAL

DANIEL CAMERON  
ATTORNEY GENERAL

1024 CAPITAL CENTER DRIVE  
SUITE 200  
FRANKFORT, KY 40601

February 24, 2023

*Via e-mail*

Michael W. McClain  
Goldberg Simpson LLC  
Norton Commons  
9301 Dayflower Street  
Prospect, KY 40059  
[mmclain@goldbergsimpson.com](mailto:mmclain@goldbergsimpson.com)

**RE: Deficient Response to Civil Investigative Demand and Subpoena**

Dear Mr. McClain:

After reviewing Margaret's Movers, Inc. ("MM") January 9, 2023 response to the Office of the Kentucky Attorney General (the "Office") civil investigative demand and subpoena ("CID"), the Office has identified several deficiencies with MM's responses. Each deficient response, and the required supplemental information or documents, is identified below. If you contend that you are unable to provide the requested supplemental materials, then please describe the efforts made to obtain the requested information and documents and explain why they are unavailable.

**Deficient Responses**

**Request No. 5:** This request requires MM to identify all current and former members, managing members, directors, officers, employees, and agents as well as their corresponding duties and responsibilities. In response, you listed four names—Margaret Weathers, Arthur Weathers, Victor Cody, and Mike Campbell.

The response is deficient. It fails to explain the corresponding duties and responsibilities of the four individuals. Please include this information in a supplemental response. Please also provide information identifying how long these individuals have been with the company and if these four people alone were responsible of the moving and storing of furniture or other items.

**Request No. 7:** This request requires MM to produce a list of all agreements between MM and customers from January 1, 2019 until the Response Date. You objected to this request as

overbroad and unduly burdensome. You also explained that MM lacked the ability to retrieve any files prior to December 2021 but that MM would continue to search its paper files.

This response is deficient. Simply stating that you no longer possess these records or are still searching for them is not sufficient. If you maintain that the responsive records are unavailable, please:

1. Describe in specific detail the nature, size or amount, and type of records (i.e., “the files from Mr. Mover”) that you maintain are unavailable;
2. Describe the efforts MM undertook, either before or after the acquisition of Mr. Mover by Mover HQ, to ensure that its business records stored in “Mr. Mover” could be retrieved or otherwise accessed;
3. Describe the efforts MM undertook, after receiving the CID, to attempt to retrieve or access its business records previously stored in Mr. Mover, including any communications between MM and the entity that owns or operates the Mr. Mover software or the Mover HQ software;
4. State whether all of the records that were once stored in Mr. Mover but that are now allegedly unavailable also exist in hard-copy form and if so, where those hard-copy records are currently located;
5. Describe in specific detail the nature, type, and amount or size of records included in your use of the term “paper files” (“Respondent is continuing to search its paper files and will supplement this Request if responsive documents are discovered.”). Identify where these “paper files” are currently located;
6. Describe the “search” that MM states is “continuing” including who from MM is performing the search and where the “search” is being conducted.

Further, your response indicates that records from before December 2021 are unavailable, but the Request also asks for records that would have been created *during and after* December 2021 (“from January 1, 2019 to the Response Date”). Please provide records responsive to Request No. 7 that are from December 2021 and after, as those records would not appear to be impacted by the change in software programs MM described in its response. In addition, MM did not indicate or even estimate when its “continuing search” of paper files would be complete. Please provide a specific deadline, no later than twenty days from the date of this letter, by which that search will be completed and by which MM will report to the Office on the results of that search.

**Requests No. 8 - 10:** These requests require MM to produce a list of all agreements that MM failed to complete, the reason why, and any documentation related to the failures.

Furthermore, Request 10 asked for information on whether MM ever completed the failed agreements later. You directed us back to your answer on Request 7.

These responses are deficient. Accordingly, please see the explanation as to why Request 7 is deficient. Please provide a supplemental response that addresses the items identified above under Request No. 7. Please include in that supplemental response information, as requested by Request Nos. 8-10, that pertains to any Agreements from December 2021 and after that presumably are not impacted at all by the change in software programs MM described in its response to Request No. 7.

**Request No. 11:** This request requires MM to list all of the locations where it has stored customers' items since January 1, 2015. MM responded by listing three addresses.

Please confirm that this list comprises the entirety of all locations where MM has stored customers' belongings, at any point in time (even on a temporary basis) since January 1, 2015. The Office has reason to believe that MM has stored customers' belongings at an additional location—a storage facility located on Dixie Highway in Louisville—such that the list provided in response to the CID is incomplete. During a recent delivery, a customer was informed of this information by a MM representative. Please supplement MM's response to this Request accordingly. Please also confirm if MM owns the building or storage facilities at each location identified.

**Requests No. 12 – 16:** These requests MM produce any communication with costumers about any items that were broken/damaged during the move, identify any consumer complaints, explain MM's response to any complaints, and to produce any and all marketing/advertising MM did between January 1, 2019 until the Response Date. You stated that MM ““is continuing to search for responsive documents and will supplement this response if responsive documents are discovered.”

These responses are deficient. Paragraph (d) of the Instructions from the CID provides that “[i]f You cannot answer a request fully and completely after exercising due diligence, then answer the request to the extent possible, specifying the basis for Your inability to answer the remainder and detailing Your attempts to secure the unknown information.”

As a result, please:

1. Describe in specific detail the nature, type, and amount or size of records included in your use of the term “paper records” (“Respondent is continuing to search its paper records and will supplement this Request if responsive documents are discovered.”);
2. Identify where these “paper records” are currently located;



3. Describe the “search” that MM states is “continuing” including who from MM is performing the search and where the “search” is being conducted;

Please confirm that records responsive to Request Nos. 12-16 are not impacted at all by the change in software programs MM described in its response to Request No. 7. In addition, MM did not indicate or even estimate when its “continuing search” of paper records would be complete. Please provide a specific deadline, no later than twenty days from the date of this letter, by which that search will be completed and by which MM will report to the Office on the results of that search.

**Request No. 19:** This request requires MM to explain and provide all documentation of its dealings with the individuals listed in Request No. 18, including but not limited to, an accounting of what happened to any missing items or damaged property. For its response to Request No. 19, MM simply refers to the responses provided in Request No. 18 and states that MM “is continuing to search for responsive documents and will supplement this response if responsive documents are discovered.”

This response is deficient because MM has not provided an accounting of what happened to any missing items or damaged property for all of the individuals listed. As part of the accounting requested, please identify for each individual listed every location at which MM stored the consumer’s belongings, beginning from when belongings were first received by MM to when MM claims belongings were returned to the consumer. In addition, no accounting or explanation at all has been provided regarding Ms. Kimberly Smith. Instead, the response to Request No. 18(c) simply states: “Ms. Smith was a customer who retained Respondent the day prior to eviction/set-out. Respondent loaded up and brought her items to Respondent’s storage facility.” Please supplement MM’s response to Request No. 18 with the information requested above.

To the extent a “search” for “responsive documents” to Request Nos. 19 and 18 is ongoing, please describe the “search” being performed (see the questions listed above under the section for Request Nos. 12 – 16) and provide a specific deadline, no later than twenty days from the date of this letter, by which that search will be completed and by which MM will report to the Office on the results of that search.

**Request No. 20:** This request requires MM to produce all documents identified in response to the previous requests and/or relied on upon in responding to the requests. MM states that it “is continuing to search for responsive documents and will supplement this response if responsive documents are discovered.”

To the extent a “search” for “responsive documents” to any Request in the CID is ongoing, please describe the “search” being performed by answering the questions listed above under the section for Request Nos. 12 – 16 and provide a specific deadline, no later than twenty days from the date of this letter, by which MM’s search will be completed and by which MM will report to the Office on the results of that search.

Please provide MM's supplemental responses to the CID no later than **March 10, 2023**. If MM is unable to provide all or part of the information or documents requested, it must set forth its efforts to obtain the requested information and documents in sufficient detail to show that it made a reasonable and diligent inquiry. If MM fails to provide the requested supplemental information or fails to provide a sufficient explanation for its inability to do so, the Office will take all appropriate action to enforce compliance with its CID and subpoena, including seeking a court order compelling further responses or additional action.

Please feel free to contact me should you have any questions or wish to discuss this matter.

Sincerely,

/s/ Sarah A. Telle  
Assistant Attorney General  
Office of Consumer Protection  
Kentucky Office of the Attorney General  
1024 Capital Center Drive  
Frankfort, KY 40601  
502-696-5578  
Email: [sarah.telle@ky.gov](mailto:sarah.telle@ky.gov)



# HHG Carrier Listing

Certificate # **C03885** Phone: (513) - 582-3592 Email: [shelby.mason@twomen.com](mailto:shelby.mason@twomen.com)

Legal Name: **BEAUTIFUL PLANET LLC**

DBA: **TWO MEN AND A TRUCK**

Physical Address: **1335 DONALDSON ROAD UNIT 13 , ERLANGER , KY 41018**

Mailing Address: **1091 READING ROAD , LOUISVILLE , KY 40217**

Certificate # **C04194** Phone: (859) - 608-0548 Email: [bigbluemovingky@gmail.com](mailto:bigbluemovingky@gmail.com)

Legal Name: **BIG BLUE MOVING LLC**

DBA: **BIG BLUE MOVING LLC**

Physical Address: **203 BIG RUN RD , LEXINGTON , KY 40503**

Mailing Address: **203 BIG RUN RD , LEXINGTON , KY 40503**

Certificate # **C03956** Phone: (502) - 599-2661 Email: [tim@cardinalmovingky.com](mailto:tim@cardinalmovingky.com)

Legal Name: **CARDINAL MOVING LLC**

DBA: **CARDINAL MOVING LLC**

Physical Address: **1811 CARGO COURT , LOUISVILLE , KY 40299**

Mailing Address: **1811 CARGO COURT , LOUISVILLE , KY 40299**

Certificate # **C04318** Phone: (502) - 712-8965 Email: [LINDSEY.SMITH2@LHCGROUP.COM](mailto:LINDSEY.SMITH2@LHCGROUP.COM)

Legal Name: **CHAPPELL MOVER LLC**

DBA: **CHAPPELL MOVERS**

Physical Address: **106 HILLSIDE LANE , LOUISVILLE , KY 40229**

Mailing Address: **106 HILLSIDE LANE , LOUISVILLE , KY 40229**

Ex. 7



## HHG Carrier Listing

Certificate # **C03006** Phone: (270) - 668-4185 Email: [corvinsmoving@gmail.com](mailto:corvinsmoving@gmail.com)

Legal Name: **CORVIN WALTER**

DBA: **CORVINS INTOWN MOVING**

Physical Address: **310 SOUTH DIXIE BLVD , RADCLIFF , KY 40160**

Mailing Address: **310 SOUTH DIXIE BLVD , RADCLIFF , KY 40160**

Certificate # **C03868** Phone: (859) - 743-6698 Email: [andrew@2dudesmovingky.com](mailto:andrew@2dudesmovingky.com)

Legal Name: **EAGLE CREEK JUNK HAULERS INC**

DBA: **2 DUDES MOVING**

Physical Address: **203 LISLE INDUSTRIAL AVE STE 102 102 , LEXINGTON , KY 40511**

Mailing Address: **203 LISLE INDUSTRIAL AVE STE 102 102 , LEXINGTON , KY 40511**

Certificate # **C04425** Phone: (214) - 998-2139 Email: [scott.bliss@twomen.com](mailto:scott.bliss@twomen.com)

Legal Name: **EVANSVILLE MOVERS LLC**

DBA: **TWO MEN AND A TRUCK**

Physical Address: **4600 OHARA DR SUITE 206 , EVANSVILLE , IN 47711**

Mailing Address: **1115 TAYLOR AVE N APT 112 , GRAND RAPIDS , MI 49503**

Certificate # **C04374** Phone: (859) - 893-2602 Email: [fromheretothereky@gmail.com](mailto:fromheretothereky@gmail.com)

Legal Name: **FROM HERE TO THERE LLC**

DBA: **FROM HERE TO THERE LLC**

Physical Address: **1171 COMMERCIAL DR STE 9 , LEXINGTON , KY 40502**

Mailing Address: **1171 COMMERCIAL DR STE 9 , LEXINGTON , KY 40502**

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Presiding Judge: HON. PHILLIP J. SHEPHERD (648260)

EXH : 000002 of 000009



# HHG Carrier Listing

Certificate # **C03828** Phone: (502) - 220-2821 Email: [jason@williamhhjohnson.com](mailto:jason@williamhhjohnson.com)

Legal Name: **JB AMBURGEY LLC**

DBA: **WILLIAM HH JOHNSON MOVING AND STORAGE**

Physical Address: **4720 LOUISVILLE RD , FRANKFORT , KY 40601**

Mailing Address: **4720 LOUISVILLE RD 4720 Louisville Rd , FRANKFORT , KY 40601**

Certificate # **C03616** Phone: (859) - 621-3422 Email: [dennis@lexingtontransport.com](mailto:dennis@lexingtontransport.com)

Legal Name: **LEXINGTON TRANSPORT SERVICES INC**

DBA: **LEXINGTON TRANSPORT SERVICES INC**

Physical Address: **667 N HOMESTEAD LN , LANCASTER , KY 40444**

Mailing Address: **667 N HOMESTEAD LN , LANCASTER , KY 40444**

Certificate # **C01153** Phone: (812) - 265-4923 Email: [Zach@madisontransfer.com](mailto:Zach@madisontransfer.com)

Legal Name: **MADISON TRANSFER AND STG INC**

DBA: **MADISON TRANSFER AND STG INC**

Physical Address: **511 W STATE ST , MADISON , IN 47250**

Mailing Address: **511 WEST STATE STREET , MADISON , IN 47250**

Certificate # **C04258** Phone: (859) - 494-3190 Email: [brittany@my3sonsmoving.com](mailto:brittany@my3sonsmoving.com)

Legal Name: **MY 3 SONS MOVING LLC**

DBA: **MY 3 SONS MOVING**

Physical Address: **661 S KEENELAND DR , Richmond , KY 40475**

Mailing Address: **PO BOX 480 , Richmond , KY 40476**

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Presiding Judge: HON. PHILLIP J. SHEPHERD (648260)

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## HHG Carrier Listing

Certificate # **C03646** Phone: (270) - 791-1755 Email: [info@thefiremenmovingco.com](mailto:info@thefiremenmovingco.com)

Legal Name: **NEAL CLAYTON LLC**

DBA: **THE FIREMEN MOVING CO**

Physical Address: **2751 GRIFFIN DRIVE , BOWLING GREEN , KY 42101**

Mailing Address: **2751 GRIFFIN DRIVE , BOWLING GREEN , KY 42101**

Certificate # **C00945** Phone: (513) - 759-6000 Email: [RFOLTZ@PLANESCOMPANIES.COM](mailto:RFOLTZ@PLANESCOMPANIES.COM)

Legal Name: **PLANES MOVING AND STORAGE INC**

DBA: **PLANES MOVING AND STORAGE INC**

Physical Address: **9823 CINCINNATI DAYTON RD , WEST CHESTER , OH 45069**

Mailing Address: **9823 CINCINNATI DAYTON RD , WEST CHESTER , OH 45069**

Certificate # **C00067** Phone: (859) - 266-2153 Email: [kwest@vincentfister.com](mailto:kwest@vincentfister.com)

Legal Name: **SAFEWAY MOVING & STORAGE INC**

DBA: **SAFEWAY MOVING & STORAGE INC**

Physical Address: **2305 PALUMBO DR , LEXINGTON , KY 40509**

Mailing Address: **2305 PALUMBO DR , LEXINGTON , KY 40509**

Certificate # **C01280** Phone: (859) - 744-6310 Email: [russ\\_coleman@bellsouth.net](mailto:russ_coleman@bellsouth.net)

Legal Name: **SAUNIER MOVING & STORAGE INC**

DBA: **SAUNIER NORTH AMERICAN**

Physical Address: **1900 Fortune Drive , Winchester , KY 40391**

Mailing Address: **1900 Fortune Drive , Winchester , KY 40391**

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Presiding Judge: HON. PHILLIP J. SHEPHERD (648260)

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## HHG Carrier Listing

Certificate # **C00528** Phone: (859) - 734-3694 Email: [contact@peavlermoving.com](mailto:contact@peavlermoving.com)

Legal Name: **T PEAFLER MOVING SYSTEMS LLC**

DBA: **T PEAFLER MOVING SYSTEMS LLC**

Physical Address: **255 MORRIS DR , HARRODSBURG , KY 40330**

Mailing Address: **255 MORRIS DR , HARRODSBURG , KY 40330**

Certificate # **C03509** Phone: (248) - 615-7000 Email: [sstahlberger@universitymoving.com](mailto:sstahlberger@universitymoving.com)

Legal Name: **UNIVERSITY MOVING & STORAGE COMPANY**

DBA: **UNIVERSITY MOVING & STORAGE COMPANY**

Physical Address: **23305 COMMERCE DRIVE , FARMINGTN HLS , MI 48335**

Mailing Address: **23305 COMMERCE DRIVE , FARMINGTN HLS , MI 48335**

Certificate # **C00065** Phone: (859) - 266-2153 Email: [kwest@vincentfister.com](mailto:kwest@vincentfister.com)

Legal Name: **VINCENT FISTER INC**

DBA: **VINCENT FISTER INC**

Physical Address: **2305 PALUMBO DRIVE , LEXINGTON , KY 40509-1010**

Mailing Address: **PO BOX 5063 , LEXINGTON , KY 40555-5063**

Certificate # **C00025** Phone: (270) - 443-5361 Email: [mmoore@wagnerenterprises.com](mailto:mmoore@wagnerenterprises.com)

Legal Name: **WAGNER MOVING & STORAGE INC**

DBA: **WAGNER MOVING & STORAGE INC**

Physical Address: **1719 NORTH 8TH STREET , PADUCAH , KY 42001**

Mailing Address: **PO BOX 1300 , PADUCAH , KY 42002**

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Presiding Judge: HON. PHILLIP J. SHEPHERD (648260)

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## HHG Carrier Listing

Certificate # **C04106** Phone: (989) - 763-6265 Email: [jsnider@powellmoving.com](mailto:jsnider@powellmoving.com)

Legal Name: **WALKER TRANSFER-POWELL LLC**

DBA: **WALKER TRANSFER-POWELL LLC**

Physical Address: **1520 BEECH ST , KENOVA , WV 25530**

Mailing Address: **4937 STARR ST SE , Grand Rapids , MI 49546**

Certificate # **C03952** Phone: (859) - 948-5335 Email: [wildcatgroupky@gmail.com](mailto:wildcatgroupky@gmail.com)

Legal Name: **WILDCAT MOVING LLC**

DBA: **WILDCAT MOVING LLC**

Physical Address: **236 BIG RUN RD , LEXINGTON , KY 40503**

Mailing Address: **236 BIG RUN RD , LEXINGTON , KY 40503**

Certificate # **C00806** Phone: (502) - 266-7777 Email: [rick@alocalvan.com](mailto:rick@alocalvan.com)

Legal Name: **A LOCALVAN MOVING & STORAGE LTD CO**

DBA: **A LOCALVAN MOVING & STORAGE LTD CO**

Physical Address: **2506 AMPERE DRIVE , LOUISVILLE , KY 40299**

Mailing Address: **2506 AMPERE DRIVE , LOUISVILLE , KY 40299**

Certificate # **C04367** Phone: (270) - 399-1997 Email: [WESLEYLAMBDIN@YAHOO.COM](mailto:WESLEYLAMBDIN@YAHOO.COM)

Legal Name: **DARLENE'S MOVING CREW LLC**

DBA: **DARLENE'S MOVING CREW LLC**

Physical Address: **320 SANDCUT RD , MADISONVILLE , KY 42431**

Mailing Address: **320 SANDCUT RD , MADISONVILLE , KY 42431**

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Presiding Judge: HON. PHILLIP J. SHEPHERD (648260)

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# HHG Carrier Listing

Certificate # **C01985** Phone: (502) - 491-2807 Email: [grobbs@goarmstrong.com](mailto:grobbs@goarmstrong.com)

Legal Name: **ARMSTRONG TRANSFER & STORAGE CO INC**

DBA: **ARMSTRONG RELOCATION**

Physical Address: **1750 RESEARCH DRIVE , LOUISVILLE , KY 40299**

Mailing Address: **1750 RESEARCH DRIVE , LOUISVILLE , KY 40299**

Certificate # **C00918** Phone: (859) - 371-8111 Email: [mma@markesberyalliedmoving.com](mailto:mma@markesberyalliedmoving.com)

Legal Name: **NELSON MARKESBERY MOVING AND STORAGE COMPANY INC**

DBA: **NELSON MARKESBERY MOVING AND STORAGE COMPANY INC**

Physical Address: **7370 INDUSTRIAL RD , FLORENCE , KY 41042**

Mailing Address: **7370 INDUSTRIAL RD , FLORENCE , KY 41042**

Certificate # **C03766** Phone: (469) - 535-7020 Email: [compliance@allmysons.com](mailto:compliance@allmysons.com)

Legal Name: **ABLE MOVING AND STORAGE COMPANY OF LOUISVILLE LLC**

DBA: **ALL MY SONS MOVING AND STORAGE OF LOUISVILLE**

Physical Address: **1821 PLANTSIDE DRIVE , JEFFERSONTOWN , KY 40299**

Mailing Address: **2400 OLD MILL ROAD , CARROLLTON , TX 75007**

Certificate # **C04216** Phone: (469) - 535-7020 Email: [compliance@allmysons.com](mailto:compliance@allmysons.com)

Legal Name: **ALL MY SONS MOVING AND STORAGE OF CINCINNATI LLC**

DBA: **ALL MY SONS MOVING AND STORAGE OF CINCINNATI LLC**

Physical Address: **3010 HARRIS AVENUE , CINCINNATI , OH 45212**

Mailing Address: **2400 OLD MILL RD , CARROLLTON , TX 75007**

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Presiding Judge: HON. PHILLIP J. SHEPHERD (648260)

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# HHG Carrier Listing

Certificate # **C03847** Phone: (651) - 634-3405 Email: [chelseae@bergerallied.com](mailto:chelseae@bergerallied.com)

Legal Name: **BERGER TRANSFER AND STORAGE INC**

DBA: **BERGER TRANSFER AND STORAGE INC**

Physical Address: **2950 LONG LAKE ROAD , SAINT PAUL , MN 55113**

Mailing Address: **2950 LONG LAKE ROAD , SAINT PAUL , MN 55113**

Certificate # **C04554** Phone: (859) - 554-4616 Email: [robert.wallace@twomen.com](mailto:robert.wallace@twomen.com)

Legal Name: **BLACK DRAGON 1 LLC**

DBA: **TWO MEN AND A TRUCK LEXINGTON KENTUCKY**

Physical Address: **789 WESTLAND DR , LEXINGTON , KY 40504**

Mailing Address: **789 WESTLAND DR , LEXINGTON , KY 40504**

Certificate # **C04605** Phone: (502) - 324-1718 Email: [dina.wallace@twomen.com](mailto:dina.wallace@twomen.com)

Legal Name: **BLACK DRAGON 2 LLC**

DBA: **TWO MEN AND A TRUCK LOUISVILLE**

Physical Address: **5959 ACTION AVE , LOUISVILLE , KY 40218**

Mailing Address: **124 ZINFANDEL LN , WALTON , KY 41094**

Certificate # **C04893** Phone: (270) - 218-2623 Email: [jon@blitzmovingcompany.com](mailto:jon@blitzmovingcompany.com)

Legal Name: **BLITZ MOVING & PARTNERS LLC**

DBA: **BLITZ**

Physical Address: **71 BENT GRASS DRIVE , SMITHS GROVE , KY 42171**

Mailing Address: **71 BENT GRASS DRIVE , SMITHS GROVE , KY 42171**

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Presiding Judge: HON. PHILLIP J. SHEPHERD (648260)

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# HHG Carrier Listing

Certificate # **C04483** Phone: (859) - 492-8067 Email: [david@ffmoveu.com](mailto:david@ffmoveu.com)

Legal Name: **FIREFIGHTERS MOVE U KY**

DBA: **FIREFIGHTERS MOVE U**

Physical Address: **240 INDUSTRY PKWY , Nicholasville , KY 40356**

Mailing Address: **240 INDUSTRY PKWY , Nicholasville , KY 40356**

Certificate # **C04543** Phone: (856) - 924-6788 Email: [compliance@allmysons.com](mailto:compliance@allmysons.com)

Legal Name: **KWIK BUT CAREFUL MOVERS OF LEXINGTON LLC**

DBA: **ALL MY SONS MOVING & STORAGE OF LEXINGTON**

Physical Address: **1003 WHIPPLE CT , LEXINGTON , KY 40511**

Mailing Address: **2400 OLD MILL RD , CARROLLTON , TX 75007**

Certificate # **C04586** Phone: (703) - 345-8104 Email: [MELISSA@QSMOVING.COM](mailto:MELISSA@QSMOVING.COM)

Legal Name: **LYNN MOVING & STORAGE INC**

DBA: **ILS RELOCATION**

Physical Address: **200 JIM CT , LOUISVILLE , KY 40229**

Mailing Address: **P O BOX 9 , BROOKS , KY 40109-0009**

Certificate # **C04619** Phone: (606) - 329-0322 Email: [localmoversofwv@gmail.com](mailto:localmoversofwv@gmail.com)

Legal Name: **WILLIAM D DYER**

DBA: **LOCAL MOVERS**

Physical Address: **1417 CHRISTINE STREET , ASHLAND , KY 41102**

Mailing Address: **1417 CHRISTINE STREET , ASHLAND , KY 41102**

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Presiding Judge: HON. PHILLIP J. SHEPHERD (648260)

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Kentucky Transportation Cabinet  
 Dept. of Vehicle Regulation/Division of Motor Carriers  
 P.O. Box 2007, Frankfort, KY 40602-2007  
 (502) 564-1257 Fax (502) 564-4138 (8:00 AM-4:30 PM EST)  
 Walk-ins 8:00 AM-4:00 PM  
 TRANSPORTATION.KY.GOV/DMC

RECEIVED  
 DEPT/VEHICLE REGULATION

2015 JAN 12 P 12:00

MARGARET'S MOVERS INC.  
 MARGARET'S MOVING & STORAGE  
 P O BOX 2864  
 LOUISVILLE

KY 40201

### 2015 KENTUCKY INTRASTATE HOUSEHOLD GOODS CERTIFICATE RENEWAL

THIS CERTIFICATE MUST BE RENEWED BEFORE JANUARY 1st OF EACH CALENDAR YEAR  
 DOT# 1325076 CO# H0178 CERTIFICATE# C3867  
 PHONE# 502-584-5234 FAX# 502-371-0615 E-MAIL MARGARET@MARGARETSMOVING.C  
 SITUS: LOUISVILLE

Kentucky Intrastate For-Hire Household Goods Certificates require a renewal fee of \$250.00 and a fee of \$10.00 per vehicle. If your company has a Kentucky Intrastate For-Hire Authority to transport freight, please submit a 2015 copy of your XRS-3. The 2015 XRS-3 will be accepted in lieu of the \$10.00 per vehicle fee. If your company has registered for Unified Carrier Registration (UCR) you may also submit the 2015 UCR receipt. The 2015 UCR receipt will be accepted in lieu of the \$10.00 per vehicle fee.

#### FEE CALCULATION

A. Total number of certificates being renewed 1 X \$250.00 = \$ 250<sup>00</sup>

B. Total number of vehicles being renewed 6 X \$10.00 = \$ 60<sup>00</sup>

Total of A and B = \$ 310<sup>00</sup>

C. A copy of the XRS-3 2015 receipt is attached in lieu of the vehicle fee YES ☐ NO ☒ or

A copy of the UCR 2015 receipt is attached in lieu of the vehicle fee YES ☐ NO ☐

Please make all fees payable to "Kentucky State Treasurer". If you do not own the vehicle(s), a TC95-15 form, Equipment Lease, must be submitted with the renewal request.

The undersigned hereby files application for renewal of Kentucky Intrastate Household Goods Certificate with Kentucky. This authorization shall remain in effect until expired by law or revoked by the Kentucky Transportation Cabinet. Any vehicle operated under this authority must carry a Kentucky Insurance Receipt. I certify that I have access to and am familiar with all applicable regulations of the U.S. Department of Transportation relating to the safe operation of commercial vehicles and the safe transportation of hazardous materials and I will comply with these regulations.

Signature Margaret Weather Print Name MARGARET WEATHER  
 CR#150389 TR#370072 \$250.00

(63) 250.00  
 (61) 60.00  
 25-CI-00771 08/11/2025  
 C3867

Kathryn Marshall, Franklin Circuit Clerk Ex. 8

CERT# C3867  
 CR#150389 TR#370073

\$60.00

**COMMONWEALTH OF KENTUCKY**  
**48<sup>th</sup> JUDICIAL CIRCUIT**  
**FRANKLIN CIRCUIT COURT, DIV. \_\_\_\_**  
**CIVIL ACTION NO: \_\_\_\_\_**

*Electronically Filed*

**COMMONWEALTH OF KENTUCKY**  
***ex rel.* RUSSELL COLEMAN, ATTORNEY GENERAL**

**PLAINTIFF**

**v.**

**MARGARET’S MOVING INC. et al.**

**DEFENDANTS**

**MOTION FOR A TEMPORARY RESTRAINING ORDER**

**NOTICE**

Please take notice that the following Motion for Temporary Restraining Order (the “Motion”) shall be heard at the convenience of the Court.

**MEMORANDUM IN SUPPORT**

The Plaintiff, Commonwealth of Kentucky *ex rel.* Russell Coleman, Attorney General of the Commonwealth of Kentucky moves the Court pursuant to KRS 367.190 to grant an *ex parte* Temporary Restraining Order against Defendants, Margaret’s Movers and Margaret Weathers. As explained below, there is good cause to believe that Defendants have engaged in and are engaged in acts and practices that violate Kentucky’s consumer protection laws. Immediate and irreparable harm will continue absent the extraordinary relief authorized by KRS 367.190 and KRS 367.200. Therefore, for the reasons stated below the Commonwealth respectfully requests that the Court grant its Motion for Temporary Restraining Order.

**I. INTRODUCTION**

The moving and storage of household goods is a stressful time for any consumer, and it often involves families relying upon the services of moving and storage companies. Consumers

depend on these companies to be honest, reliable, and to deliver high-quality service during one of life's most stressful transitions. At a minimum, consumers reasonably expect moving companies to provide honest service and to uphold their contractual obligations.

Unfortunately, not all moving companies are able to meet this reasonable standard. One such moving company, Margaret's Moving Inc., d/b/a Margaret's Movers Inc, Margaret's Moving and Storage ("Margaret's Movers") sought to capitalize on the consumer vulnerability by misrepresenting its expertise and ability to move and store consumers' household goods. Specifically, Margaret's Movers falsely holds itself out as a company legally authorized to provide moving services in the Commonwealth of Kentucky despite not being registered and thus permitted to transport household goods within the Commonwealth since 2015. Additionally, the Office of the Kentucky Attorney General has received numerous consumer complaints against Margaret's Movers. The complaints reveal that Margaret's Movers misled consumers into believing it would 1) properly move the goods; 2) store the goods in a secure, climate-controlled facility; and 3) return the goods when asked by the consumers. The Attorney General files this Motion to request that this Court provide an injunction to protect Kentucky consumers from Margaret's Movers' illegal and harmful conduct.

Contemporaneous with this Motion, the Commonwealth has filed a Complaint alleging Margaret's Movers has violated the KCPA by committing "unfair, false, misleading and deceptive acts" in violation of KRS 367.170. The Attorney General files this Motion pursuant to KRS 367.190 and seeks a temporary restraining order against Margaret's Movers because Margaret's Movers' unlawful conduct is ongoing.

## **II. FACTUAL BACKGROUND**

1. Plaintiff, the Commonwealth of Kentucky *ex rel.* Russell Coleman, Attorney General, is responsible for enforcing the Kentucky Consumer Protection Act, KRS 367.110 *et seq.* (hereinafter “KCPA”). The Attorney General is authorized by KRS 367.190 to bring this action in the name of the Commonwealth of Kentucky and the Attorney General has determined that bringing this action in the name of the Commonwealth to be in the public interest.

2. Defendant Margaret’s Moving Inc. is a Kentucky corporation with its principal place of business located at 104 East Breckinridge Street, Louisville, KY 40203.

3. Upon information and belief, Defendants Margaret Weathers and Arthur “Stormy” Weathers are co-owners of Margaret’s Movers.

4. Margaret’s Movers holds itself out as moving company that provides “residential and commercial moving and storage services” that offers “local moving service in Lexington, Indianapolis, Louisville, and the surrounding areas.” *See* Exhibit 1, Margaret’s Movers, margaretsmoving.com, landing page, last accessed August 7, 2025.

5. Despite advertising its ability to provide intrastate services, i.e., state or local moving services, Margaret’s Movers does not have the required certificate from the Kentucky Transportation Cabinet’s Department of Vehicle Regulation (the “Department”) to provide such services. *See* Exhibit 2, Affidavit of Bill Debord. In failing to obtain this certificate, Margaret’s Movers is engaged in misleading and deceptive acts by advertising and providing moving services for which they are not legally authorized to provide.

6. Further, as stated in the Complaint, the Attorney General has received numerous consumer complaints regarding Margaret’s Movers and the moving and storage services it provided to consumers. *See* Exhibit 3, Consumer Complaint Forms and Correspondence.

7. Consumer complaints received by the Office concern one or more of the following: (1) failure to return items to the consumer after storage; (2) failure to disclose where the consumer's items were being stored; (3) damage to the consumer's items during moving and storage; and (4) theft and conversion of consumer's items entrusted to Margaret's Movers for storage. *Id.*

8. This motion seeks to preclude Margaret's Movers from making continued misrepresentations to Kentucky consumers regarding its qualifications and/or licensing to Kentucky perform intrastate moves and to preclude it from continuing to unfairly compete against other Kentucky moving companies that are operating lawfully. Ultimately, a temporary restraining order is necessary to prevent Margaret's Movers from continuing to prey on Kentucky consumers with acts and practices that are declared unlawful pursuant to KRS 367.170.

### **III. LEGAL STANDARD**

The KCPA contains a specific provision authorizing the Attorney General to obtain a restraining order or temporary or permanent injunction. KRS 367.190(1) provides in pertinent part:

Whenever the Attorney General has reason to believe that any person is using, has used, or is about to use any method, act or practice declared by KRS 367.170 to be unlawful, and that proceedings would be in the public interest, he may immediately move in the name of the Commonwealth in a Circuit Court for a restraining order or temporary or permanent injunction to prohibit the use of such method, act or practice.

Considering the paramount interest of protecting consumers from an ongoing deceptive scheme or practice, the KCPA provides a relaxed standard for the granting of injunctive relief as compared to the standards contained in Kentucky Rule of Civil Procedure 65.

The Kentucky Court of Appeals recognized the lower threshold in *Chandler v. Anthem Insurance Companies Inc.* 8 S.W.3d 48, 55 (Ky. App. 1999) noting:



[w]e regard this relaxation of the usual standards governing the availability of an injunction as a strong indication of the General Assembly's intent that the Consumer Protection Act, in the hands of the Attorney General, be a flexible and effective means of combating abusive trade practices however novel their forms or well disguised their sources.

In terms of remedies, the Court is granted broad authority under KRS 367.200 to enter orders necessary to protect consumers, including "additional orders or judgments as may be necessary to restore to any person in interest any moneys or property, real or personal, which may have been paid out as a result of any practice declared to be unlawful by KRS 367.130 to 367.300." KRS 367.200. The Court of Appeals found KRS 367.200 vests "the Attorney General with the authority to seek restitution on behalf of defrauded consumers, and that the authority may be exercised concurrently with his authority to maintain an action for injunctive relief under KRS 367.190." *Com. ex rel. Beshear v. ABAC Pest Control, Inc.*, 621 S.W.2d 705, 706–07 (Ky. Ct. App. 1981). This power also includes appointing a receiver or revoking a license or certificate authorizing any person to engage in business in the Commonwealth, or both. KRS 367.200.

#### **IV. ARGUMENT**

The Commonwealth is entitled to injunctive relief against Margaret's Movers because all requirements under KRS 367.190 are met.

##### **A. The Attorney General has reason to believe that Defendants have engaged in and will continue to engage in conduct prohibited by KRS 367.170.**

The Attorney General has reason to believe that Margaret's Movers has engaged in "unfair, false, misleading, or deceptive acts or practices" in violation of KRS 367.170 for several reasons. First, Margaret's Movers is offering, providing, and advertising moving services, despite not being legally authorized to do so. Second, based on consumer complaints received by the Attorney General there is reason to believe that Margaret's Movers is failing to return items to consumers.

**i. Margaret's Movers does not have the required certificate from the Department of Vehicle Regulation to offer motor carrier services.**

In order to provide intrastate moving services in the Commonwealth, a person must obtain a "certificate from the Department." KRS 281.630(1). Margaret's Movers has not obtained this certificate since 2015 but continues to advertise and provide moving services to Kentucky consumers. *See* Ex. 1; *See also* Ex. 2. By continuing to offer its services without the appropriate credentialing, Margaret's Movers is misleading the public into believing it is authorized to provide intrastate moving services in the Commonwealth. This conduct establishes that the Attorney General has ample reason to believe that Margaret's Movers is violating the KCPA, meriting the issuance of a temporary restraining order.

The General Assembly enacted the KCPA "to protect the public interest and the well-being of both the consumer public and the ethical sellers of goods and services." KRS 367.120(1). Margaret's Movers conduct runs afoul of both goals of the KCPA. Its conduct is deceptive because the company is advertising and providing services for which it has no right to engage, and its behavior is unfair to ethical motor carriers who obtained the necessary certificate from the Department before providing moving services. Therefore, allowing Margaret's Movers to continue operating without obtaining the necessary certificate thwarts the purposes of the KCPA and warrants the issuance of a temporary restraining order.

Pursuant to KRS 281.630(1), "a person shall not act as a motor carrier without first obtaining a certificate from the [D]epartment." A "motor carrier" is defined in relevant part as "any person in either a private or for-hire capacity who owns, controls, operates, manages, or leases, except persons leasing to authorized motor carriers, any motor vehicle for the transportation of passengers or property upon any highway..." KRS 281.010(34). The term "highway" means

“all public roads, highways, streets, and ways in this state, whether within a municipality or outside of a municipality.” KRS 281.010(24).

One certificate offered by the Department is a household goods certificate, which is a “certificate granting authority for the operation of one (1) or more household goods vehicles.” KRS 281.010(27). A motor carrier wishing to obtain a household goods certificate to begin offering moving services must apply to the Department to obtain it. KRS 281.630(3)(c). This requires:

- a. filing a motor carrier vehicle license application for each motor carrier vehicle;
- b. obtaining and retaining for a period of at least three years a nationwide criminal background check of each employee operating a passenger vehicle or household goods vehicle or entering a private residence or storage facility for the purpose of providing or facilitating the transportation of household goods;
- c. filing with the Department of Vehicle Regulation an approved bond or insurance policy; and
- d. filing a current tariff.

*Id.* Each certificate issued by the Department must be renewed annually. KRS 281.630(4)(a). A certificate that is not renewed within one calendar year after the date for its renewal is null and void. KRS 281.630(4)(b).

Maragaret’s Movers has not obtained a household goods certificate since 2015 and thus has been illegally providing moving services for approximately ten years. This conduct not only violates KRS Chapter 281 requirements, but the KCPA as well as it deceives consumers who assume that they are obtaining moving services from a company that is legally authorized to provide motor carrier services. In *Nat’l Hearing Aid Soc. v. Com. ex rel. Hancock*, for example, the Court of Appeals determined that an injunction under KRS 367.190 was appropriate against an industry group claiming that it could certify individuals as hearing aid audiologists even though

their standards did not satisfy Kentucky's licensing requirements. 551 S.W.2d 247, 249 (Ky. Ct. App. 1977). The Court reasoned that because the group did "not meet the standards and requirements set for by KRS 334A.030" the use of the term "certified hearing audiologist" by the group was inherently misleading to consumers, meriting the issuance of an injunction. *Id.*

The Attorney General has reached the same conclusion in multiple opinions. In OAG 75-454, the Attorney General found that any person claiming to be an "audiologist" without receiving the proper credentialing was engaged in illegal behavior. *See* Exhibit 4, OAG-75-454 at \*2. This conduct not only violated the relevant licensing statutes, but was also "false, misleading, and deceptive to the public and thus in violation of the Consumer Protection Act, KRS 367.170." *Id.* Similarly, in OAG 82-430, the Attorney General determined that a dentist who performed dental procedures in Kentucky without complying with Kentucky's licensing laws would also violate the KCPA. *See* Exhibit 5, OAG 82-430 at \*2. While the opinions of the Attorney General are not binding upon the Court, they are considered "highly persuasive" and have been afforded "great weight." *York v. Com.*, 815 S.W.2d 415, 417 (Ky. Ct. App. 1991). Similar to the audiologist and dentist example, without the appropriate credentialing, Margaret's Movers is misleading the public into believing it is authorized to provide intrastate moving services in the Commonwealth.

A review of Department of Vehicle Regulation filings reveals that Weathers is responsible for Margaret's Movers failure to obtain the necessary certificate to provide intrastate moving services. Weathers was the individual who last renewed Margaret's Movers Household Goods certificate in 2015. *See* Exhibit 6, Margaret's Movers Renewal Application Household Goods Certificate. In addition, the certificate provided to Margaret's Movers as result of Weathers' efforts clearly provides that it expires on December 31, 2015. *See* Exhibit 7, Margaret's Movers Intrastate Household Good Certificate. As such, Weathers was clearly aware of her company's legal

obligations but allowed it to continue operating without obtaining the required certificate for nearly ten years. Therefore, there is evidence that Weathers either “actively participated in the scheme or was aware of its existence and did nothing about it.” *Dare to Be Great, Inc. v. Kentucky ex rel Hancock, Ky.*, 511 S.W.2d 224 (1974). This provides the Attorney General with ample reason to believe that Weathers has engaged in conduct which violates the KCPA which warrants the issuance of a restraining order against her.

Ultimately, the Court should apply the reasoning of the Kentucky Court of Appeals and issue a restraining order to preclude Margaret’s Movers from operating until it receives all necessary certifications from the Department. To permit otherwise not only allows Margaret’s Movers to engage in deceptive conduct against consumers but is unfair to every moving company that obtained the necessary certifications prior to operating in the Commonwealth.

**ii. The Attorney General has received numerous complaints against Margaret’s Movers.**

Since 2017, the Attorney General has received consumer complaints concerning Margaret’s Movers and the company’s failure to properly perform moving and storage services. The complaints received and reviewed by the Attorney General reveal a troubling and familiar pattern. *See* Ex. 3. Consumers report that after employing Margaret’s Movers either for moving or storage purposes, many of their personal items go missing. Even after reporting these losses Margaret’s Movers fails to take any steps to address these concerns, either by returning the lost property or by returning the consumer’s money to compensate them for their lost property. The serious nature of these complaints provides the Attorney General with ample reason to believe a violation of the KCPA has occurred, is occurring, or will occur in the future.

**B. A temporary restraining order is appropriate as these proceedings are in the public interest.**

The Attorney General must establish that the proceedings are “in the public interest” to obtain a temporary restraining order under the KCPA. KRS 367.190(1). Because Defendants are “using, ha[ve] used, or [are] about to use [a] method, act or practice declared by KRS 367.170 to be unlawful” it will be in the public interest to enjoin them from conducting business in the Commonwealth. KRS 367.190(1). The Kentucky legislature enacted the KCPA because it found that “the public health, welfare and interest require a strong and effective consumer protection program to protect the public interest and the well-being of both the consumer public and the ethical sellers of goods and services[.]” KRS 367.120(1). Thus, conduct in violation of the KCPA is by its very nature harmful to the public health and welfare and granting a TRO to enjoin violations of the KCPA inherently promotes the public interest. This is further underscored by “the General Assembly’s intent that the Consumer Protection Act, in the hands of the Attorney General, be a flexible and effective means of combating abusive trade practices however novel their forms or well disguised their sources.” *Com. ex rel. Chandler v. Anthem Ins. Companies, Inc.*, 8 S.W.3d 48, 55 (Ky. Ct. App. 1999). Granting the Attorney General’s request for a TRO against Defendants is in the public interest because it will prevent Defendants from engaging in further violations of the KCPA, ensure that the public receive services from reputable and accredited persons and organizations, and protect the public from further loss or destruction of their personal property at the hands of the Defendants.

**C. Consumers will suffer immediate harm, loss or injury from Margaret’s Movers’ Conduct**

Pursuant to KRS 367.190(2) a temporary “restraining order shall be granted whenever it reasonably appears that any person will suffer immediate harm, loss or injury from a method, act

or practice prohibited by KRS 367.170.” The Kentucky Court of Appeals has explained that under a traditional TRO analysis the “the element of ‘immediacy’ contemplates that the parties show an urgent necessity for relief” and that there is a “reasonable probability that injury will be done if no injunction is granted.” *Maupin v. Stansbury*, 575 S.W.2d 695, 698 (Ky. Ct. App. 1978). However, “where a government entity seeks an injunction to enforces its police powers, irreparable harm is presumed to exist.” *Eubanks & Marshall of Lexington, PSC v. Com.*, 2016 WL 4555927, at \*9 (Ky. Aug. 25, 2016) (citing *Boone Creek Props., LLC v. Lexington-Fayette Urb. Cnty. Bd. of Adjustment*, 442 S.W.3d 36, 41 (Ky. 2014)).<sup>1</sup>

Here there can be no doubt that Margaret’s Movers is engaged in conduct that violates the KCPA and that consumers will face immediate harm, loss, or injury if a restraining order is not entered against the Defendants. A business violates the KCPA by providing and advertising services for which it does not have the proper credentialling or certificate. *See* Ex. 5, OAG-75-454. Margaret’s Movers provides moving services despite not having the necessary certificate from the Department as required by KRS 281.630. Without the certificate, a business is not permitted to provide intrastate moving services within the Commonwealth. Despite lacking this certificate, Maragret’s Movers claims it can provide “local moving service in Lexington, Indianapolis, Louisville and the surrounding areas.” *See* Ex. 1. Further, Margaret’s Movers proudly claims certification from a variety of organizations including the American Moving and Storage Association, the Certified Moving Consultant (CMC), a Female Business Enterprise with the Louisville/Jefferson County Human Relations Commission and a Certified Office and Industrial

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<sup>1</sup> Under Kentucky Rule of Appellate Procedure 41, *Eubanks* is not binding authority because it has been designated “Not to be Published”; however, the case it cites for the proposition, *Boone Creek*, is binding.

Consultant (COIC). *See* Exhibit 8 - Margaret's Movers Website, margartesmoving.com "Our History" tab, last accessed August 7, 2025. The description of services and the reference to these certifications provides consumers with the false impression that Maragret's Moves is legally permitted to provide moving services with the Commonwealth.

In addition, a review of the consumer complaints submitted to the Attorney General reveals that consumers have suffered significantly because of the Defendants' actions. One consumer, Jackie Evans, hired Margaret's Movers to move and store several items. *See* Ex. 3 at 1-4. Despite being paid in full, Maragret's Movers failed to deliver several pieces of furniture to Evans and failed to properly secure Evans' property resulting in its loss. *Id.* Another consumer, Donna Rasmussen, failed to receive a box of jewelry after they used Margaret's Movers' services. *Id.* A third consumer, Kim Smith, used Maragret's Movers, which subsequently failed to deliver several items to her after she utilized the company for her personal move. *Id.* at 5.

Margaret's Movers endangers the general public by failing to comply with the standards established in KRS Chapter 281 and by misrepresenting to consumers that the business possesses the necessary credentials to legally provide intrastate moving services. Every move done by Margaret's Movers in this context is a violation of the KCPA, and the consumer complaints received by the Attorney General reveals their conduct is causing consumer to suffer immediate and irreparable harm.

Therefore, unless restrained, Margaret's Movers will only continue flouting the Department's requirements by performing intrastate moves without the proper approvals, as it has done for the past decade. Margaret's Movers will also continue misleading the public through its website into believing it is a competent, accredited moving business. Based on its past conduct, which has led to several consumers complaining about lost or stolen personal property, it is



reasonable to conclude that should Margaret's Movers continue operating it is likely to only cause further harm to consumers. As a result, all the requirements of KRS 367.190 have been met and a restraining order should issue.

#### **V. CONCLUSION**

For all the foregoing reasons, the Motion for Temporary Restraining Order should be granted and the proposed order tendered herewith should be entered.

Respectfully submitted,

RUSSELL COLEMAN  
ATTORNEY GENERAL

/s/ John Ghaelian  
John M. Ghaelian  
Jonathan E. Farmer  
Assistant Attorney General  
Office of Consumer Protection  
Office of the Attorney General  
1024 Capital Center Drive  
Frankfort, KY 40601  
John.Ghaelian@ky.gov  
Jonathan.Farmer@ky.gov  
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(502) 696-5448

104 E BRECKINRIDGE STREET  
LOUISVILLE, KY, 40203

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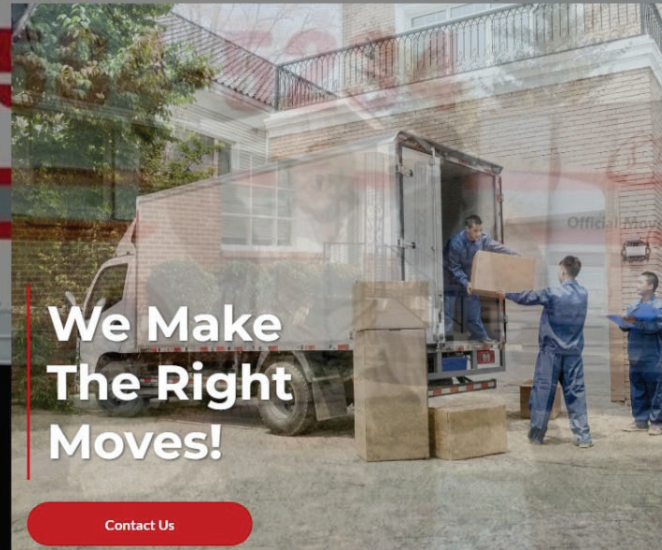
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Kentucky And The Surrounding Areas**



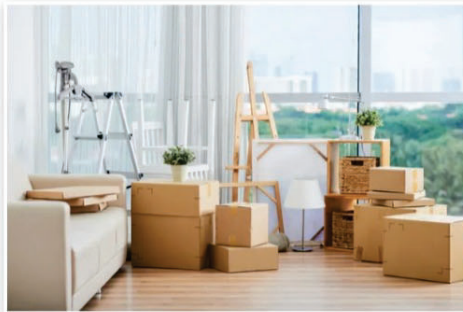
At Margaret's Moving & Storage we provide residential and commercial moving and storage services. We offer



local moving service in Lexington, Indianapolis, Louisville, and the surrounding areas. When you're looking for a honest mover choose Margaret's Moving & Storage. We are a family owned company providing complete moving services for over 18 years. We always offer competitive rates on storage and moving solutions for businesses and families. Please contact us today at 502-584-5234 for a free quote. We are always happy to welcome new customers.

## Reliable Moving Services

Margaret's Moving & Storage provides moving service for both large and small moves. You can pack on your own or we will pack your whole house if you prefer a full-service move. Whatever your moving needs are, we offer as many or as few moves as you need. We also offer all the moving supplies you need.



## Private & Secure Storage

When you choose Margaret's Moving & Storage for your moving service we will keep your valuable items secure in our warehouse. Our storage is not open to the public, it is only for our moving customers, so you can be certain your valuables are safe.

## Moving Insurance

### Where We Are A Preferred Vendor

Margaret's Moving & Storage provides each of our customers .60 per pound per article if your item gets damaged. This is not insurance. If you want to buy moving insurance for Full Value Replacement visit [www.movinginsurance.com](http://www.movinginsurance.com).

## Understand Your Rights!

Learn about your responsibilities and rights when moving. Visit [www.protectmymove.gov](http://www.protectmymove.gov) for more information.

## Contact Us Today!

At Margaret's Moving & Storage, we know that moving can be very stressful. That is why we go above and beyond to make your moving experience the best you will ever have! Call our licensed moving consultants now at 502-584-5234 for the best movers in town!

Filed

25-CI-00771 08/11/2025

Kathryn Marshall, Franklin Circuit Clerk

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#### CONTACT INFORMATION

PHONE: 502-584-5234  
 ADDRESS: 104 E Breckinridge St, Louisville, KY 40203  
 HOURS OF OPERATION:  
 Mon - Fri 8:00 am - 5:00 pm  
 Saturday 8:00 am - 2:00 pm  
 Sunday Closed



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**AFFIDAVIT OF BILL DEBORD**

I, William C. Debord, being first duly sworn, do hereby depose and state as follows:

1. I am employed by the Commonwealth of Kentucky, Transportation Cabinet, Department of Vehicle Regulation, Division of Motor Carriers, as an Administrative Specialist III.
2. I am competent to testify to the facts alleged herein, and I have personal knowledge of these facts.
3. My job duties include, but are not limited to, monitoring the activities of Kentucky household goods carriers (i.e., those individuals and businesses who transport personal property used in a dwelling), responding to complaints by citizens pertaining to the services of Kentucky household goods carriers, and monitoring and assisting with the licensing of Kentucky household goods carriers.
4. My job duties require me to monitor the holders of various intrastate for hire operating authorities, including household goods certificate carriers to ensure that they are properly licensed.
5. The Division of Motor Carriers maintains a list of all authorized motor carriers in the Commonwealth of Kentucky that hold a household goods certificate. The list was last updated on June 1, 2025, and Margaret's Movers is not listed.
6. Arthur Weathers and Margaret Weathers, individually and doing business as Margaret's Movers Inc., Margaret's Moving and Storage, have not held a household goods certificate or license from December 31, 2015, until the present day as required by KRS Chapter 281 for the intrastate transportation of household goods.

I AFFIRM UNDER PENALTY OF PERJURY THAT THE FOREGOING REPRESENTATIONS ARE TRUE.

  
WILLIAM C. DEBORD

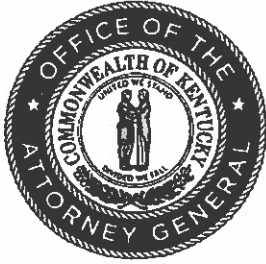
COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF Franklin )

Subscribed and sworn to before me, a Notary Public, by BILL DEBORD, on this 6<sup>th</sup>,  
day of August, 2025.

Melissa L. Gash KYNP36487  
NOTARY PUBLIC

My commission expires: 9-10-2025

10/3/22, 9:21 AM

<https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin>

# ATTORNEY GENERAL **DANIEL CAMERON**

## Secure Online System

### Application Information

Submission Id **037ea122-7835-4412-afd9-b3298368dbc9**Completion Date **10/1/2022 2:55:20 PM**

### Consumer Complaint and Mediation Form

Name **Jackie Evans**Address **4334 Foeburn Lane**City **Louisville**State **KY**ZIP/Postal Code **40207**County **Jefferson**Home Phone **502-314-4693**Mobile Number **502-314-4693**E-Mail **Jackiehevens@gmail.com**Are you Active Duty Military? **No**Company or person your complaint is against **Margaret's Moving and Storage**Company Address **2620 7th street road**Company City **Louisville**Company State **KY**Company ZIP **40208**Company Phone **502-584-5234**

Company E-Mail

Was a contract signed? **False**Date(s) of transaction **July 13th, 2017**Product or service involved **Entire belongings of a residential property**

Ex. 3

10/3/22, 9:21 AM

<https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin>Total Price **10,500**Amount Paid **10,500 plus 2500 for deliveries after storage**How did you hear about this product or service? **0**With what other agencies have you filed a complaint? **0**What action was taken by those agencies? **0**Have you hired or retained an attorney? **False**Have you started court action? **False**

What action will resolve your complaint? **Acknowledging the fraud/stolen property of my storage items. Restitution for all who have had similar issues with their property at Margaret's Moving and Storage.**

Briefly state the facts of your complaint **-items of household were removed from property but many items were never returned after storage. Nothing was left at the property after initial move. 2-3 Pallets of furniture and miscellaneous boxed items were never delivered back to owner.**

Document Upload

## Electronic Signature

I Acknowledge **False**Electronic Signature **Jacqueline h evans**Date **10/01/2022**

## Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

## HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification



**May, Shellie A (KYOAG)**

---

**From:** Jackie Evans <jackiehevens@gmail.com>  
**Sent:** Friday, September 30, 2022 1:22 PM  
**To:** May, Shellie A (KYOAG)  
**Subject:** Margaret's Moving and Storage Claim

To whom it may concern,

Margaret's Moving and Storage was hired on July 13th, 2017 by Greg Evans to move and store the contents of 6900 Longview Lane, Louisville, Kentucky 40222. On July 14th, roughly around 9:30am they started the process and completed late into the afternoon on the 14th. No furniture was left behind, only trash and items to be moved by the Evans. Jackie Evans, Greg's wife at the time paid Margaret on July 14, July 19 and on another day for the fee of moving and storing all belongings on pallets. The total payment was over \$10,000.

Margaret's Storage was located at 2620 Seventh Street , Louisville, KY 40208.

I visited that location 3 times to make the payments and briefly saw my belongings grouped together on pallets. Margaret's held my furniture , boxes, etc until June 2018, August 11, 2018 and September 10th . They delivered my pallet items to a friend's warehouse first , then the remaining items to a storage center.

Margaret's was paid in full for all three moves. After the final delivery, it was clear I had numerous belongings ``stolen" . The items are noted as 1 blue harvest table (\$2500), 2 Lane Venture Outdoor Wicker Loveseats (\$3200), Large Bar(\$650) and antique long bench (\$350) from Merridan Home Furnishings, Hall bench with Yellow Crewel fabric (\$1200), 1 ping pong table (\$400) and various boxes of kitchen and personal items.

I notified Margaret's that many pieces were gone, their response was that they delivered everything and whatever was missing must have been left behind. No furniture was left behind.

With that being said, I went to the Seventh Street location to look for my missing items and to my surprise they had moved. The woman in the office said they moved to Hill Street. I went to Hill Street 4 or 5 times to look for my belongings, however they were never located. During the times at Hill Street, I saw Kim Smith's pallets of furniture and boxes. It was a large area and seemed to be full of upholstery, boxes, mattresses and casegoods.

Unfortunately, Kim had so much more stolen from Margaret's storage facility. The amount of palletized items I saw at Hill Street and the amount of furniture delivered to Kim's house definitely were not of equal quantity. It should have been truck loads of furniture instead of one sole trunk. I was at her home on the delivery day and witnessed the entire delivery.

Best,

Jackie Evans

Sent from my iPhone

10/3/22, 9:18 AM

<https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin>

# ATTORNEY GENERAL **DANIEL CAMERON**

## Secure Online System

### Application Information

Submission Id **d076a5b2-eae6-4db0-b097-983bb2ee4b0f**Completion Date **9/30/2022 11:50:24 AM**

### Consumer Complaint and Mediation Form

Name **Kimberly Smith**Address **10213 Timberwood Circle**City **Louisville**State **KY**ZIP/Postal Code **40223**County **Jefferson**Home Phone **502-442-5715**Mobile Number **502-442-5715**E-Mail **kimray.smith1@outlook.com**Are you Active Duty Military? **No**Company or person your complaint is against **Margaret's Moving and Storage**Company Address **104 East Breckinridge Street**Company City **Louisville**Company State **KY**Company ZIP **40203**Company Phone **502-584-5234**Company E-Mail **margaret@margaretsmoving.com**Was a contract signed? **True**Date(s) of transaction **11/17/17 through 07/29/22**Product or service involved **Moving and storage**<https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin>

10/3/22, 9:18 AM

<https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin>Total Price **\$49,416**Amount Paid **\$49,416**How did you hear about this product or service? **Friend**With what other agencies have you filed a complaint? **Reached out to Jefferson County Attorney and file a police report with Shively PD**What action was taken by those agencies? **none**Have you hired or retained an attorney? **True**Have you started court action? **False**

What action will resolve your complaint? **Full Replacement of the \$390,000+ of items that are missing/stolen, reimbursement of the storage and moving fees of \$49,416 and repair of the \$25,000 in repairs needed for items received damaged. Consumer Protection Agency investigation to prevent future damage and loss to future customers**

Briefly state the facts of your complaint **See attached overview doc**

Document Upload

## Electronic Signature

I Acknowledge **True**Electronic Signature **Kimbely L Smith**Date **09/30/22**

## Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

## HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**

**May, Shellie A (KYOAG)**

---

**From:** kim smith <kimray.smith1@outlook.com>  
**Sent:** Friday, September 30, 2022 1:26 PM  
**To:** May, Shellie A (KYOAG)  
**Subject:** Smith Loss  
**Attachments:** 4500 River Road Storage Inventory additional items missing.xlsx; LossInventory Submitted to State Farm.pdf

**\*\*CAUTION\*\* PDF attachments may contain links to malicious sites. Please contact the COT Service Desk [ServiceCorrespondence@ky.gov](mailto:ServiceCorrespondence@ky.gov) for any assistance.**

Shellie,

I have attached all the loss I submitted to State Farm. I have full replacement insurance – if they quit denying it. This does not include irreplaceable like photos and memorabilia from my girls childhood. This is the equivalent to a fire – I am still remembering items that are missing as I finish opening boxes. They had an initial inventory upon the initial move of all case goods, furnishings, electronics, rugs and furs (most of which are missing). I did not have a complete inventory of the 450 boxes content. Most boxes are open except the xmas as there are many and I haven't had time.

Kim Ray Smith  
Certe Management  
502.442.5715  
Sent from [Mail](#) for Windows

10/3/2022 11:03 AM

## Additional Missing and Damaged

Foyer	QTY	RECEIVED	NOTES	Est Replacement Value
Lamp and shade	1	0		450
Decorative items	3	0		1800
Living Room				
Framed wall décor	4			1200
decorative items	6			850
Dining Room				
Large brass hurricanes	2	0-Jan		600
Floral table plate set	8	0		750
Salt Cellar Collection - Limoge	20	0		1200
Salt Cellar Collection - cobalt and sterling	8	0		550
Salt Cellar Collection - gold procelain	18	0		250
Sterling Salt spoons	24	0		1100
Pewter Salt Spoons	16	0		250
Murano Glass Vases - color	3	0		950
Family Room				
Framed wall décor	4	0		1800
Custom shelves for decoys	4	1	250 each	750
Kitchen				
Glassware service for 16	1	0	tail and shorts	450
coaster - leather		0		85
coasters - glass		0		160
Pot Holders		0		100
Cooler - large	1	0		200
Cooler - small	12	0		75
butter dish - porcelain	1	0		75
in cabinet spice rack	2	0		250
Wood cutting boards	3	0		500
Cutting boards - rubber	4	0		40
Kuerig Coffee Maker - Stainless	1	0	Missing	200
Chester Paralelm Delphin	1	1	Broken/replaceable	
Strip Oil Painting	1	1	Canvas Damaged	

## Additional Missing and Damaged

10/3/2022 11:03 AM

salt box - marble	1	0			40
measuring cups and spoons- metal - all clad	1	0			120
glass mixing bowls - nest	1	0			50
Chair Cushions	8			Damaged Fabric - cuts	1250
Library					
By seat horse upholstered front	1	0		Dirty/Fabric \$1500	1500
Master bedroom					
Decorative items	5	0			1500
Framed decorative items	6	0			
Wing back chairs	2	1		Damaged Cushions	
Lamps and shades	5	2			1500
TV Room					
Leather ottoman	1	1		Damaged	850
Custom side chairs - BWD	2	2		Dirty	
3 antique foot stools - BWD	3	3		Dirty	
Uppper Hall					
Lizzy Room					
Framed wall art	2	0			450
Custom Bedding Lizzy Room	1	0		Missing	1100
Bernhart Chest	1	1		Bowed out in back/drawers not closing/not repairable	3200
Skirted Round Table	1	1		Damaged	950
Baker Club Chair	1	1		Dirty/fabric damaged	
Teal Bench	2	2		1 damaged	450
White and blue wood desk chair	1	1		Dirty/fabric damage	
Katie Room					
Antique Hall table from bed	1	1		Damaged/Repairable missing	
Barbra Berry Bedding	1	0		Blank for	500
Mattress/box springs - Full	1	1		Dirty/Damaged	1800
Misc:					
Antique Side Chairs	4	3		One Missing	1200
Barstools	3	3		Damaged/Repairable	

10/3/2022 11:03 AM

## Additional Missing and Damaged

Long Camel Cashmere Coat/Max Mara	1	0	Missing/Box torn open	2400
Black Pants suit	1	0	Missing/Box torn open	1500
Bed Pillows	12	0		1300
Ballard Design Outdoor Umbrella	1	0		950
Ballard Design Umbrella Stand	2	0		400



## Loss Inventory

Submitted 8/18/2022 8:21:16 PM UTC

Item Description	Brand or Manufacturer	Model Number	Qty Lost	Item Age	Cost to Replace Pre-tax (each)	Place Where Purchased/Obtained	Condition	Room
Antique Accent Chair with Pineapple carved legs	unknown		1	50yr/0mo	\$3,500.00	Antique /show	Above Average	Foyer
Baker Historic Charleston Demi Lune Tables	Baker		2	10yr/0mo	\$7,500.00	Baker	Above Average	Foyer
Baker Flip Top Game Table	Baker	2577	1	18yr/0mo	\$9,500.00	Baker	Above Average	Living Room
Baker Chippendale Loveseat/Custom Fabric	Baker	845-64	1	19yr/0mo	\$10,000.00	Baker	Above Average	Living Room
Baker Pie Crust Tilt Top Table	Baker	1965	1	19yr/0mo	\$3,500.00	Baker	Above Average	Living Room
Baker Historic Charleston Side Chairs w / Custom Fabric	Baker		2	23yr/0mo	\$4,000.00	Baker	Above Average	Living Room
Brass Coffee Table	Unknown		1	18yr/0mo	\$3,000.00	Unknown	Above Average	Living Room
Tibetan Rug			1	19yr/0mo	\$7,500.00	Fran Jasper Rugs	Above Average	Living Room
Baker Side Table	Baker		1	16yr/0mo	\$3,500.00		Above Average	Living Room
Antique carved mahogany Plantstands	Unknown		2	40yr/0mo	\$750.00	Antique Dealer	Above Average	Living Room
Custom wood Carved Drapery Rods - 8'4" with Rings			3	20yr/0mo	\$1,000.00	Selby House	Above Average	Living Room
Custom Panels with Baker Fabric			3	20yr/0mo	\$5,000.00	Selby House	Above Average	Living Room
Black and gold long mirror neo classical			1	70yr/0mo	\$1,250.00	Antique Dealer	Above Average	Living Room
Primitive Pine Dry Sink mid 1800's	Unknown		1	125yr/0mo	\$4,200.00	Auction	Above Average	Family Room
Baker Regency Leather Bench	Baker		1	15yr/0mo	\$6,500.00	Baker	Above Average	Family Room
Milling Road 68" inlaid mahogany round table	Baker	41197	1	20yr/0mo	\$12,000.00	Baker	Above Average	Dining Room
Iron Bed	Brass Beds of Va		1	30yr/0mo	\$5,000.00	Inherited	Above Average	Bedroom
Queen Mattress and Boxspring	Stems and Foster		1	6yr/0mo	\$5,000.00		Above Average	Bedroom
King Mattress and Boxspring			1	7yr/0mo	\$10,000.00		Above Average	Bedroom
Club Chair - Leather	Arhaus		2	8yr/0mo	\$4,500.00		Above Average	Family Room
Leather Ottoman	Arhaus		2	8yr/0mo	\$2,000.00		Above Average	Family Room
Maitland Smith Leather Chest	Maitland Smith		1	6yr/0mo	\$2,000.00	Dwellings	Above Average	Family Room
Antique Victorian Pine dresser style Sideboard	unknown		1	140yr/0mo	\$4,500.00	Inherited	Above Average	Family Room
Sony tv	Sony		1	5yr/0mo	\$800.00	Best Buy	Above Average	Bedroom
Baker Mahogany Dining Chair	Baker		8	19yr/0mo	\$2,000.00	Baker	Above Average	Dining Room
9 x 12 Persian Serapi Rug			1	100yr/0mo	\$7,500.00	Fran Jasper Rugs	Above Average	Dining Room
Antique 3 legged Pine Plant Stand	Unknown		1	100yr/0mo	\$2,500.00	Inherited	Above Average	Dining Room
Custom Wool Sisel Rug	Unknown		1	8yr/0mo	\$6,500.00		Above Average	Dining Room
Baker Chest	Baker		1	14yr/0mo	\$7,500.00		Above Average	Dining Room
Large Bronze Indian Statue	Unknown		1	50yr/0mo	\$3,800.00	Inherited	Above Average	Library

Loss Inventory for Claim # 1737K151K Page 1 (printed 9/6/2022 2:02:13 PM UTC)

Baker French Country bed w/ leather	Baker	1922-06	1	20yrf0mo	\$20,000.00	Baker	Above Average	Master Bedroom
Baker French Chemy Chest	Baker	2574	1	20yrf0mo	\$8,500.00	Baker	Above Average	Master Bedroom
Baker English Cottage Chair	Baker		1	13yrf0mo	\$5,500.00	Baker	Above Average	Master Bedroom
Leather Top Antique Side Tables	Unknown		2	60yrf0mo	\$2,000.00	Antique Dealer	Above Average	Master Bedroom
French Napoleon Salon Chair			1	125yrf0mo	\$2,100.00	Antique Dealer	Above Average	Master Bedroom
Custom Pull Out Sofa			1	5yrf0mo	\$3,300.00	Barry Wooley Designs	Above Average	Game Room
Nesting Tables	Pottery Barn		1	5yrf0mo	\$650.00	Pottery Barn	Above Average	Game Room
Antique Wicker Side Chairs	Creel and Gow		1	45yrf0mo	\$1,500.00	Inherited	Above Average	Game Room
50" Television	Sony		1	7yrf0mo	\$1,500.00	Best Buy	Above Average	Game Room
XBox with package	Xbox		1	7yrf0mo	\$899.00	Best Buy	Above Average	Game Room
Orange 4x7 rug			1	6yrf0mo	\$1,250.00	BWD	Above Average	Game Room
Dell Monitor	Dell		1	6yrf0mo	\$350.00	Best Buy	Above Average	Game Room
HP Printer office jet pro	HP		1	7yrf0mo	\$275.00	Best Buy	Above Average	Game Room
Baker Chest	Baker	7968	1	19yrf0mo	\$8,000.00	Baker	Above Average	Study
Italian Wine Table			1	5yrf0mo	\$1,650.00	BWD	Above Average	Bedroom
Window Panels - Ivory	Donna Karen		10	5yrf0mo	\$350.00	Donna Karen	Above Average	Bedroom
Ivory/Tapered Lamps			2	5yrf0mo	\$320.00	BWD	Above Average	Bedroom
Mirrored Desk			1	5yrf0mo	\$2,450.00	BWD	Above Average	Bedroom
Console Table	Pottery Barn		1	5yrf0mo	\$1,000.00		Above Average	Bedroom
Orange Glass Lamps			2	6yrf0mo	\$320.00	Barry Wooley Designs	Above Average	Bedroom
Suri 9 x 12 Navy Rug			1	6yrf0mo	\$2,200.00		Above Average	Bedroom
Custom window Treatment/Katie Room			1	6yrf0mo	\$1,250.00	BWD	Above Average	Bedroom
Kenmore Canister Vacuum	Kenmore		1	8yrf0mo	\$585.00		Above Average	Closet
42" Tv	Sony		2	6yrf0mo	\$450.00	Best Buy	Above Average	Bedroom
Baker Side Table	Baker	7972	1	20yrf0mo	\$3,500.00	Baker	Above Average	Living Room
Pottery barn outdoor wicker 2 chairs 2 ottomans	Pottery Barn		1	7yrf0mo	\$4,000.00	Pottery Barn	Above Average	Lawn / Patio / Deck
Sonos smart speakers	sonos		3	5yrf0mo	\$299.00	Best Buy	Above Average	Family Room
Sound Bar with Woofer	Sony		1	8yrf0mo	\$650.00	Best Buy	Above Average	Game Room
72" Aquos TV			1	8yrf0mo	\$1,000.00	Best Buy	Above Average	Family Room
Magnolia Stereo Receiver	Magnolia		1	8yrf0mo	\$899.00	Best Buy	Above Average	Family Room
32" television			2	6yrf0mo	\$250.00	Best Buy	Above Average	Bedroom
Coffee Grinder	Capresso		1	10yrf0mo	\$99.00	Williams Sonoma	Average	Kitchen
Flatware 20 piece			2	7yrf0mo	\$460.00	Williams Sonoma	Average	Kitchen
Serving pieces			1	7yrf0mo	\$250.00	Williams Sonoma	Average	Kitchen
Toaster	Breville		1	6yrf0mo	\$200.00	Williams Sonoma	Above Average	Kitchen
Slow Cooker	All Clad		1	5yrf0mo	\$330.00	Williams sonoma	Above Average	Kitchen
Hand Mixer			1	6yrf0mo	\$140.00	Williams Sonoma	Above Average	Kitchen
Wustof Knife Set	Wustof		1	9yrf0mo	\$1,500.00	Williams Sonoma	Above Average	Kitchen
Stainless Steel French Press			1	8yrf0mo	\$85.00	Williams sonoma	Above Average	Kitchen
Baking Pans	Williams Sonoma		1	5yrf0mo	\$75.00	Williams Sonoma	Above Average	Kitchen

Loss Inventory for Claim # 1737K151K Page 2 (printed 9/6/2022 2:02:13 PM UTC)

All Clad cookware	All Clad				1	10yr/0mo	\$900.00	Williams Sonoma	Above Average	Kitchen
Salt and Pepper Mills	Williams sonoma				1	6yr/0mo	\$100.00	Williams Sonoma	Above Average	Kitchen
Stainless Roaster	All clad				1	8yr/0mo	\$200.00	Williams Sonoma	Above Average	Kitchen
Hart Chandelier	Hart				1	19yr/0mo	\$3,500.00	Rueff Lighting	Above Average	Dining Room
Custom wood curtain rods w/rings					3	19yr/0mo	\$1,000.00	Selby House	Above Average	Master Bedroom
Black and Gold Mirror - Medium					1	20yr/0mo	\$2,000.00		Above Average	Master Bedroom
Faux Burlap Custom Shower Curtain					1	5yr/0mo	\$600.00		Above Average	Bathroom
Gray framed bathroom accessories					3	5yr/0mo	\$175.00		Above Average	Bathroom
Tanita Body Composition Weight Scale	Tanita				1	6yr/0mo	\$100.00	Amazon	Above Average	Bathroom
Waterford Crystal service for 8					1	12yr/0mo	\$2,750.00		Above Average	Dining Room
Baccarat Crystal Service for 8					1	11yr/0mo	\$3,750.00		Above Average	Dining Room
Simon Pearce Martini	Simon Pearce				8	10yr/0mo	\$85.00	Simon Pearce	Above Average	Dining Room
Simon Pearce Tumblers	Simon Pearce				8	10yr/1mo	\$85.00	Simon Pearce	Above Average	Dining Room
Simon Pearce Whiskey					8	10yr/0mo	\$75.00		Above Average	Dining Room
Simon Pearce - White					8	11yr/0mo	\$85.00		Above Average	Dining Room
Simon Pearce - Red					8	11yr/0mo	\$85.00		Above Average	Dining Room
Simon Pearce - Champagne					8	11yr/0mo	\$85.00		Above Average	Dining Room
Waterford Red					8	7yr/0mo	\$85.00		Above Average	Dining Room
Antique etched crystal service for 8					1	100yr/0mo	\$1,000.00	Inherited	Average	Dining Room
Black Tie Bagley Mischka Black Evening Gown	Bagley Mischka				1	9yr/0mo	\$650.00	SAKS	Above Average	Closet
Nicole Miller Cocktail Dress	Nicole Miller				1	6yr/0mo	\$795.00	Rodeo Drive	Above Average	Closet
Grey Nicole Miller Gown	Nicole Miller				1	7yr/0mo	\$700.00	Rodeo Drive	Above Average	Closet
Bagley Mischka Cocktail Dress	Bagley Mischka				1	6yr/0mo	\$495.00	SAKS	Above Average	Closet
Halston Gown	Halston				1	6yr/0mo	\$675.00	NM	Above Average	Closet
Halston Cocktail Dress	Halston				2	6yr/0mo	\$600.00	Blink Boutique	Above Average	Closet
Leather Desk					1	8yr/0mo	\$2,750.00		Above Average	Study
Waterford White					8	7yr/0mo	\$85.00		Above Average	Dining Room
Waterford Champagne					8	7yr/0mo	\$85.00		Above Average	Dining Room
lux king blanket					1	7yr/0mo	\$225.00	NM	Above Average	Master Bedroom
lux queen blanket					1	7yr/0mo	\$200.00	Bloomingdales	Above Average	Bedroom
Metal Maitland Smith Tole Containers - pair	Maitland Smith				2	15yr/0mo	\$455.00	Antique Shop	Above Average	Living Room
Various Platters					10	13yr/0mo	\$100.00	Various Retailers	Above Average	Storage Area/Room
Sterling Salad Forks	Gorham				8	19yr/0mo	\$100.00		Above Average	Dining Room
Hall Runner Rugs					4	9yr/0mo	\$1,000.00		Above Average	Foyer
7ft Christmas Tree	Balsam Hill				1	8yr/0mo	\$650.00	Balsam Hill	Above Average	Storage Area/Room
Baker Book Table	Baker				1	17yr/0mo	\$3,000.00	Baker	Above Average	Family Room
Antique Portuguese table linens for harvest table					2	44yr/0mo	\$250.00	Inherited	Above Average	Kitchen
Black Lamp with bee					1	12yr/0mo	\$750.00		Above Average	Master Bedroom
Waterford Table Linens for Harvest Table					2	10yr/0mo	\$250.00		Above Average	Kitchen

Loss Inventory for Claim # 1737K151K Page 3 (printed 9/6/2022 2:02:13 PM UTC)

Potterbarn Hemstitched table runner - harvest table				4	8yr/0mo	\$125.00		Above Average	Kitchen
18 x 18 Blue Chenille pillows				2	6yr/0mo	\$280.00	BWD	Above Average	Bedroom
Full Length Silver Fox Coat				1	0yr/0mo	\$7,500.00		Above Average	Closet
Sheared Mink Stroller				1	24yr/0mo	\$6,400.00		Above Average	Closet
All Weather Wicker Rocker				1	20yr/0mo	\$500.00		Above Average	Lawn / Patio / Deck
Lampshades				10	7yr/0mo	\$125.00		Above Average	Family Room
Custom Drape Rods				2	20yr/0mo	\$1,000.00		Above Average	Dining Room
Stationary Drape Panels				4	20yr/0mo	\$1,250.00		Above Average	Dining Room
Lamps				5	7yr/0mo	\$400.00		Above Average	Living Room
Rosenthal China /Service for 8				1	16yr/0mo	\$2,500.00		Above Average	Dining Room
Rosenthal Service Pieces				9	15yr/0mo	\$166.67		Above Average	Dining Room

Loss Inventory for Claim # 1737K151K Page 4 (printed 9/6/2022 2:02:13 PM UTC)

11:37



## Margaret's Movers



I am not trying to upset  
you anymore than you  
are.

I just want to tell you first  
of all I'm sorry that this  
move wasn't stress free &  
peaceful.

Secondly, as far as claims,  
I think we can put in an  
initial claim and then  
amend if needed.  
Because it would be  
impossible for anyone to  
go through this many  
boxes in a short period of  
time.

I believe by law you have  
180 days. I'll double  
check with Donny.



11:38

**Margaret's Movers**

IS OT little consolation but I do care. We don't work as hard as we do for things to go wrong. I will do everything in my control to mitigate the situation.

Fri, Jul 29, 8:23 PM

I would like to come to the warehouse and look around for my things.

Assuming still at 7th Street. 2620? I'll be by tomorrow. What is a convenient time?

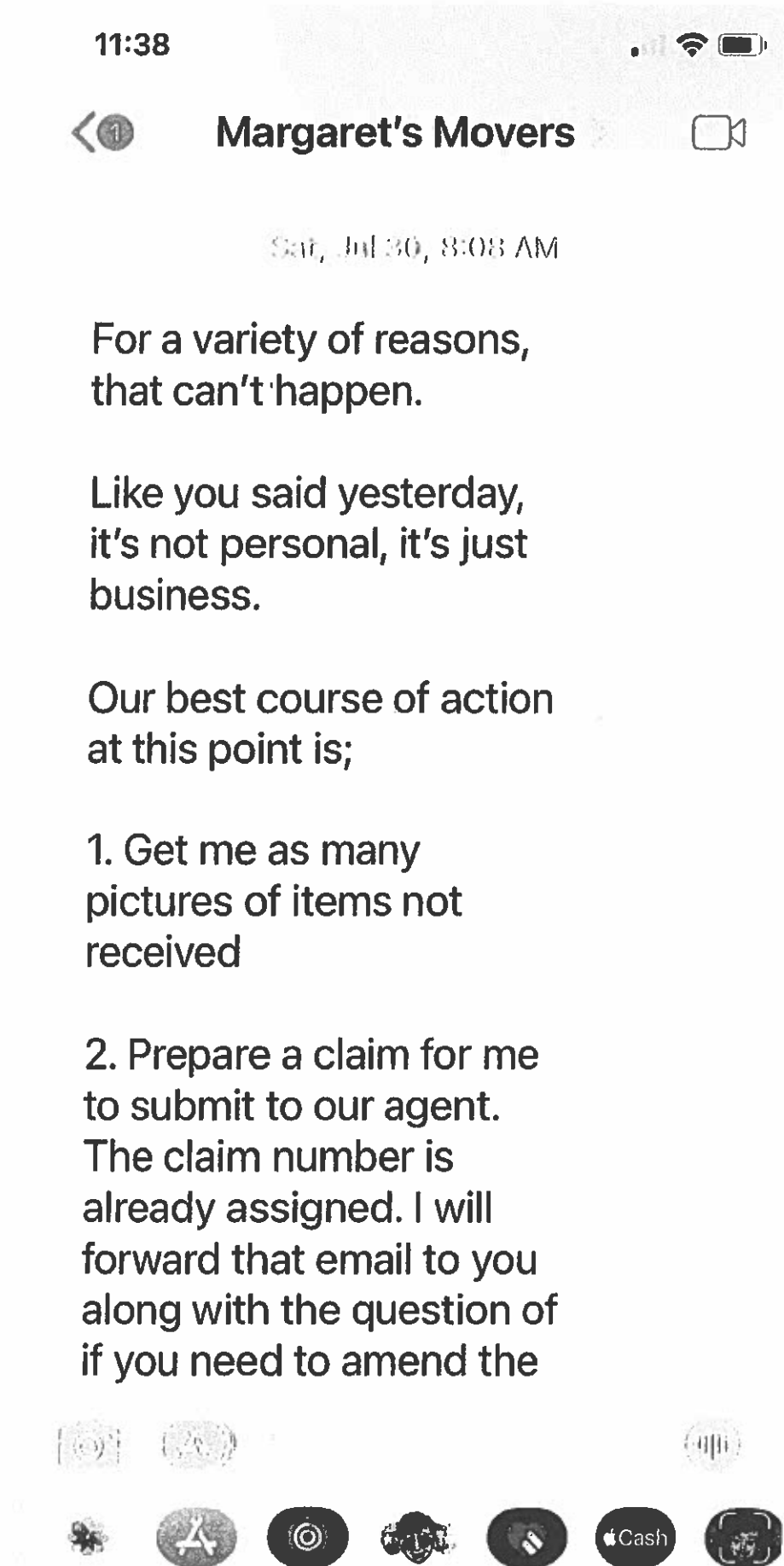
Delivered

Sat, Jul 30, 10:25 AM

Can you please answer me?

Sent as Text Message





11:38

**Margaret's Movers**

My insurance agent is Donny Anderson and he's been my agent for more than 15 years. He handles many movers in the area. He merged with Shepherd Insurance a few years ago. He has your name, address, email and phone number.

Please know that I've been stressed about this situation and I know that is of little consolation but I do care. We don't work as hard as we do for things to go wrong. I will do everything in my control to mitigate the situation.

Fri, Jul 29, 8:23 PM

I would like to come to the





11:39



## Margaret's Movers



2. Prepare a claim for me to submit to our agent. The claim number is already assigned. I will forward that email to you along with the question of if you need to amend the claim & the time frame to do that.

3. Work through your boxes to identify any claims therein.

4. I will work on my side to identify any remaining items to mitigate the claim.

5. I will find out the completion date of the items taken to be repaired and forward that to you.



11:39



## Margaret's Movers



4. I will work on my side to identify any remaining items to mitigate the claim.

5. I will find out the completion date of the items taken to be repaired and forward that to you.

6. Let me know when you need empty boxes picked up and I will get someone over to get them.

I understand you have a lot on your plate & I am doing my level best to alleviate as much of that stress as I can.

Sat, Jul 30, 10:26 AM



11:38

**Margaret's Movers**

Have answer. Didn't see this. Also looking for my Ken more canister vacuum blue and gray

iMessage  
Friday 9:47 AM

State Farm is turning down my claim. It is a huge claim. I need you to work with me on this and return their call. None of this was my fault. I have experienced so much loss over the past 5 years and I will not survive this loss. I have nothing. My life is destroyed because of this. I trusted you with everything I owned and it's gone.

Sent as Text Message



## Consumer Complaint Form Admin

### Application Information

Submission Id 941af9c1-2737-4aba-a165-238219dfb9b0

Completion Date 7/24/2019 10:09:18 AM

Name Donna Rasmussen

Address 9317 Tiverton Way

City Louisville

State KY

ZIP/Postal Code 40242

County Jefferson

Home Phone 502-231-3640

Mobile Number 502-533-1576

E-Mail donna.rasmussen05@gmail.com

Are you Active Duty Military? No

Company or person your complaint is against Margaret's Moving and Storage

Company Address 2620 Seventh Street Road

Company City Louisville

Company State KY

Company ZIP 40208

Company Phone 502-584-5234

Company E-Mail

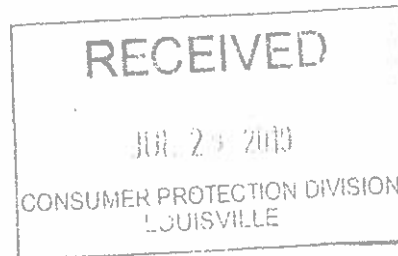
Was a contract signed? True

Date(s) of transaction 06/03/19

Product or service involved Moving company

Total Price \$2656.00

Amount Paid \$2656.00



How did you hear about this product or service? **Used them before**

With what other agencies have you filed a complaint? **Louisville Metro Police**

What action was taken by those agencies? **none so far**

Have you hired or retained an attorney? **False**

Have you started court action? **False**

What action will resolve your complaint? **Refund of service of moving.**

Briefly state the facts of your complaint **A box of jewelry was taken. Not received at new location**

Verification

4145A41B-0448-4695-B8CC-47962B677BD9 : 000129 of 000153

Presiding Judge: HON. PHILLIP J. SHEPHERD (648260)

EXH : 000023 of 000032

# CONSUMER MEDIATION REQUEST FORM

## RECEIVED

ANDY BESHEAR  
ATTORNEY GENERAL



AUG 05 2019  
Office of the Attorney General  
Office of Senior Protection and Mediation  
1024 Capital Center Drive • Frankfort, KY 40601  
Hotline: 1-888-432-9267 • FAX: 502-573-7151  
www.ag.ky.gov

TYPE OR PRINT NEATLY. SUBMIT TWO COPIES OF THE COMPLAINT AND TWO COPIES OF ANY DOCUMENTS SUBMITTED.

Name ☐ Mr ☒ Mrs ☐ Ms DONNA M. RASMUSSEN  
Address 9317 TIVERTON WAY  
City LOUISVILLE State KY Zip Code 40242 County JEFFERSON  
Home phone 502-231-8640 Work/Cell Phone 502-533-1576  
Email Address DONNA.RASMUSSEN05@GMAIL.COM

PLEASE NOTE WE ARE UNABLE TO OFFER MEDIATION SERVICES WITHOUT COMPLETE INFORMATION IN THIS SECTION.

Company your complaint is against? MARGARET'S MOVING & STORAGE  
Address 2620 SEVENTH STREET ROAD  
City LOUISVILLE State KY Zip 40208 County JEFFERSON  
Phone 502-584-5234

## RECEIVED

AUG 06 2019

Please fill in this section completely.

Was a contract signed? ☒ YES ☐ NO (If yes, please attach a copy of your contract)

Where was the contract signed? ☐ In your home ☐ At the business ☐ Other \_\_\_\_\_

Date(s) of transactions 6-3-19 Product/Service Involved MOVERS

Total Price \$ 2656.00 Amount Paid \$ 2656.00 Was product/service advertised ☐ YES ☐ NO

How was service advertised? ☐ Newspaper ☐ TV ☐ Radio ☐ Mail ☐ Phone ☐ Email ☐ Internet ☐ Other \_\_\_\_\_

With what other agencies have you filed this complaint? LMPD, AMERICAN EXPRESS

What action was taken? NONE SO FAR

Have you hired or retained a private attorney? ☐ YES ☒ NO Have you started court action? ☐ YES ☒ NO

If you have retained a private attorney or, this matter is pending before or has been decided in the courts, our office will be unable to offer mediation services.

What action will resolve your complaint? REFUND OF PAYMENT

Below, briefly state the facts of your complaint (if necessary, use additional paper). Please attach copies of any papers involved (order blanks, warranties, credit card receipts or statements, contracts, advertisements, canceled checks, etc.). The information you provide will be used in our effort to resolve your problem and may be shared with the party against which you have complained. It may also be used to enforce applicable state laws. Under Kentucky's Open Records Act, this complaint will be available for public view upon request. Certain personal information such as account numbers are not subject to the Open Records Act.

A BOX OF JEWELRY WAS TAKEN BY THE MEN WHO MOVED US. IT WAS NOT IN THE BOXES THAT WERE DELIVERED. THERE WERE 6 MEN AND 2 TRUCKS. I GAVE COMPANY A LIST OF ITEMS. THE BOX WAS WORTH \$3200. ATTACHED IS THE COMPLAINT TO MARGARETS.

I authorize that the information submitted on this consumer mediation complaint form is true and accurate to the best of my knowledge.

*Donna M. Rasmussen*  
Signature

8-1-19  
Date

#### AUTHORIZATION TO RELEASE INFORMATION

Please complete this section only if your complaint involves a financial institutions, mortgage/loan concerns, a debt collector, a medical provider or other issues that require a third party authorization. This is a voluntary release of information and is not required to file a mediation complaint, however in order for the business entity to disclose personal information with our office a release is needed.

The undersigned has submitted a consumer complaint and is currently working with the Kentucky Office of the Attorney General through the mediation process and hereby authorizes the company listed below (and its employees) to speak with and discuss my account/loan/mortgage on my behalf with the Kentucky Office of the Attorney General. The parties listed are each authorized to share with the other any and all information concerning my account, including but not limited to, financial information, without further authorization and until this matter is closed by the Office of the Attorney General or the Authorization is revoked.

Name of Company/Agency Authorized to Release Information \_\_\_\_\_

Account/Loan Number \_\_\_\_\_

Email address \_\_\_\_\_

#### HIPAA Privacy Authorization - Authorization for Use or Disclosure of Protected Health Information

I authorize \_\_\_\_\_ (healthcare provider) to use and disclose my protected health information to the Office of the Attorney General for use in my consumer mediation complaint.

Signature \_\_\_\_\_

Date \_\_\_\_\_

#### OPTIONAL- COMPLETION OF THIS SECTION IS VOLUNTARY

AGE OF THE PERSON INVOLVED IN THE TRANSACTION: ☐ 0-15 ☐ 16-25 ☐ 26-39 ☐ 40-59 ☐ 60-75 ☐ 76-over

The Office of the Attorney General does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or the provision of service and provides, upon request, reasonable accommodations including auxiliary aids and services necessary to afford individuals with disabilities an equal opportunity to participate in all programs and activities.

Division: 8 DISTRICT

**Incident/Investigation Report**

Beat: 815

Agency: LMPD

Case Number: 80-19-044348

Case Status: OPEN INACTIVE

**Property**

Seq. # <b>1</b>	Description SHOE BOX FULL OF COSTUME JEWELRY		Serial Number		Make/Model
Owner RASMUSSEN, DONNA			License / State		Color
Status STOLEN/BTC	Status Officer (6862) GRBEN, KEVIN S		Quantity 1.00	Units of Measure	Value \$3000.00
Gun Type	Caliber	Finish	Grip		Gun Stock
Condition	Gun Test <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Test Type	Sight Test <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Sight Type	
Property Notes					

**Notes/Narratives****PUBLIC NARRATIVE**

Victim states that she used a moving company to move her from her old address 8904 Sidney Way to her new listed address. Victim states that workers from the moving company stole her property during the move.



RECEIVED

NOV 28 2018

CONSUMER PROTECTION DIVISION

To: Office at Attorney General  
700 Capital Ave Suite 118  
Frankfort, Ky. 40601

From: Bobby D. Sewell  
12572 Spring Falls Court  
Louisville, Ky. 40229

RECEIVED

NOV 29 2018

CONSUMER PROTECTION DIVISION  
LOUISVILLE

Att: Honorable John Michael Brown

I'm sending you this complaint at the request of my attorney Oliver H. Barber Jr.

Enclosed you will find the consumer complaint form which was hard to fill out because of the nature of the complaint.

As you can see, I owned the house that Margaret's Moving company moved out the person that I bought the house from. I purchased the house on September 28, 2018 and took pictures which are included. The movers came in and damaged the floor on Oct. 2, 2018 while moving the other family out. Since I didn't hire them to move her out, the moving company claims they have no dealings with me, but I owned the house at the time.

I have made every attempt to get the moving company to fix this problem but they have done nothing thus far except tell me they are not going to do anything and for me not to call them any more and contact my lawyer.

As you can see, I have written them two times about this problem but they refuse to do anything.

I have enclosed just a few pictures of before and after which I shared with the moving company.

If this cannot be cleared up through your influence, I have no choice but to take legal action against this company for damages.

Sincerely Bobby D. Sewell Date Nov. 21, 2018

4145A41B-0448-4695-B8CC-47962B677BD9 : 000133 of 000153

Presiding Judge: HON. PHILLIP J. SHEPHERD (648260)

EXH : 000027 of 000032

# CONSUMER COMPLAINT FORM

JACK CONWAY  
ATTORNEY GENERAL



RETURN TO:  
Office of Attorney General  
Consumer Protection Division  
310 Whittington Parkway, Suite 101  
Louisville, KY 40222  
Phone: (602) 429-7134  
Fax: (602) 429-7129  
Hotline: (888) 432-9267  
www.ag.ky.gov/op

TYPE OR PRINT NEATLY. SUBMIT TWO COPIES OF THE COMPLAINT AND TWO COPIES OF ANY DOCUMENTS SUBMITTED.

YOUR NAME ☒ Mr ☐ Mrs ☐ Ms Bobby D. Sewell  
ADDRESS 12572 Spring Falls Court  
CITY Louisville STATE KY ZIP CODE 40229 COUNTY Bullitt  
HOME PHONE 502-277-1492 WORK/CELL PHONE 502-649-1935  
EMAIL ADDRESS: bdsew74@gmail.com

COMPANY OR PERSON(S) YOUR COMPLAINT IS AGAINST Margaret's moving & storage  
ADDRESS 2620 7th St. Rd  
CITY Louisville STATE Kentucky ZIP CODE 40208  
PHONE: 502-584-5234

Please fill in this section completely.

WAS A CONTRACT SIGNED? ☐ YES ☐ NO (If Yes, Please Attach a Copy of Your Contract.)

WHERE WAS CONTRACT SIGNED? ☒ IN YOUR HOME ☐ AT THE BUSINESS ☐ OTHER \_\_\_\_\_

DATE(S) OF TRANSACTION Oct 2, 2018 PRODUCT OR SERVICE INVOLVED Damaged Floor

TOTAL PRICE \$7421.18 AMOUNT PAID \_\_\_\_\_ WAS PRODUCT/SERVICE ADVERTISED? ☐ YES ☐ NO

HOW WAS SERVICE ADVERTISED? ☐ Newspaper ☐ TV ☐ Radio ☒ Mail ☐ Phone ☐ Email ☐ Internet ☐ Other \_\_\_\_\_

WITH WHAT OTHER AGENCIES HAVE YOU FILED THIS COMPLAINT? BBB - yelp

WHAT ACTION WAS TAKEN? 3 Flooring people have looked at floor & stated it can't be repaired, it must be replaced.

HAVE YOU HIRED OR RETAINED A PRIVATE ATTORNEY? ☒ YES ☐ NO HAVE YOU STARTED COURT ACTION? ☐ YES ☒ NO

WHAT ACTION WILL RESOLVE YOUR COMPLAINT? The Floor must be replaced but moving company refuses to do anything about it.

Below, briefly state the facts of your complaint (If necessary, use additional paper). Please attach copies of any papers involved (order blanks, warranties, credit card receipts or statements, contracts, advertisements, canceled checks, etc.). The information you provide will be used in our effort to resolve your problem and may be shared with the party against which you have complained. It may also be used to enforce applicable state laws. Under Kentucky's Open Records Act, this complaint will be available for public view upon request. Certain personal information such as account numbers are not subject to the Open Records Act.

I purchased a patio home on Sept. 28, 2018. I and my realtor took pictures of the house inside, especially the high-gloss finished flooring. The floor was in great shape which was a selling point. Margaret's moving co. moved the person out of the house on Oct. 2, 2018 severely damaging the floor with long scrapes, gouges all the way through the finish into the wood. The person that moved out of the house stated that the movers damaged the floor.

I contacted the moving company. They said they would look into it. I called numerous times but they would not answer or the secretary would say they were not available.

After several weeks stormy weathers called, saying he was 1/2 owner of the company. I ask him to come look at the floor. Finally he came & brought a flooring person with him. This flooring person stated to both of us that the floor could not be repaired but had to be replaced. Stormy Weathers sent another guy out and he said the same thing. I had a flooring co. come out for an estimate. Can't be repaired. Cost to replace is \$17,421.18. Mr. Weathers refuses to do anything and told me not to call him anymore, that he was not going to replace the floor and to call my lawyer and hung up the phone.

If Your Complaint is Regarding a Health Club Membership, Also Complete this Section.

WAS CONTRACT SIGNED? ☐ YES ☐ NO DATE OF CONTRACT \_\_\_\_\_ LENGTH OF CONTRACT: YEARS \_\_\_\_\_ MONTHS \_\_\_\_\_

TIME LEFT BEFORE CONTRACT EXPIRES: YEARS \_\_\_\_\_ MONTHS \_\_\_\_\_

TOTAL AMOUNT OF YOUR CONTRACT: \$ \_\_\_\_\_ AMOUNT PAID TO DATE: \$ \_\_\_\_\_

HOW WERE YOUR PAYMENTS TO BE MADE? ☐ MONTHLY ☐ YEARLY ☐ OTHER

AMOUNT OF EACH PAYMENT? \$ \_\_\_\_\_ WHEN WAS YOUR LAST PAYMENT? \_\_\_\_\_

HAVE YOU MADE PAYMENTS TO ANY COMPANY OTHER THAN THIS HEALTH CLUB? ☐ YES ☐ NO

If yes, please provide the following information:

NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

The above information is true and accurate to the best of my knowledge.

TODAY'S DATE Nov. 21, 2018 YOUR SIGNATURE Solby D. Swell

OPTIONAL- COMPLETION OF THIS SECTION IS VOLUNTARY

AGE OF THE PERSON INVOLVED IN THE TRANSACTION: ☐ 0-15 ☐ 16-25 ☐ 26-39 ☐ 40-59 ☐ 60-75 ☐ 76-over

The Office of the Attorney General does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or the provision of service and provides, upon request, reasonable accommodations including auxiliary aids and services necessary to afford individuals with disabilities an equal opportunity to participate in all programs and activities.

# CONSUMER COMPLAINT FORM

ANDY BESHEAR  
ATTORNEY GENERAL



RETURN TO:  
Office of Attorney General  
Consumer Protection Division  
310 Whittington Parkway, Suite 101  
Louisville, KY 40222  
Phone: (502) 429-7134  
Fax: (502) 429-7129  
Hotline: (888) 432-9257  
www.ag.ky.gov/cp

TYPE OR PRINT NEATLY. SUBMIT TWO COPIES OF THE COMPLAINT AND TWO COPIES OF ANY DOCUMENTS SUBMITTED.

YOUR NAME ☒ Mr ☐ Mrs ☐ Ms Kurt Reibling  
ADDRESS 7216 Edmonson Place  
CITY Prospect STATE KY ZIP CODE 40059 COUNTY Jefferson  
CELL PHONE 502-649-5468 WORK PHONE 502-855-3911  
EMAIL ADDRESS: KReibling@Reibling-LLC.com

COMPANY OR PERSON(S) YOUR COMPLAINT IS AGAINST Margaret's Moving & Storage  
ADDRESS 2620 Seventh Street  
CITY Louisville STATE KY ZIP CODE 40208  
PHONE: 502-584-5234

Please fill in this section completely.

WAS A CONTRACT SIGNED? ☐ YES ☒ NO (If Yes, Please Attach a Copy of Your Contract.)  
WHERE WAS CONTRACT SIGNED? ☐ IN YOUR HOME ☐ AT THE BUSINESS ☐ OTHER \_\_\_\_\_  
DATE(S) OF TRANSACTION 11/11/16 11/13/16 11/16/16 PRODUCT OR SERVICE INVOLVED Residential Move  
TOTAL PRICE \$1,883.00 AMOUNT PAID \$1,883.00 WAS PRODUCT/SERVICE ADVERTISED? ☒ YES ☐ NO  
HOW WAS SERVICE ADVERTISED? ☐ Newspaper ☒ TV ☒ Radio ☒ Mail ☐ Phone ☐ Email ☒ Internet ☐ Other \_\_\_\_\_  
WITH WHAT OTHER AGENCIES HAVE YOU FILED THIS COMPLAINT? MARGARET'S MOVERS (see attached claim)  
WHAT ACTION WAS TAKEN? NONE

HAVE YOU HIRED OR RETAINED A PRIVATE ATTORNEY? ☐ YES ☒ NO HAVE YOU STARTED COURT ACTION? ☐ YES ☒ NO  
WHAT ACTION WILL RESOLVE YOUR COMPLAINT? For Margaret's Moving & Storage to repair damages and reimburse me  
for destroyed items. Damages incurred at Origin Address of 18731 Willington Circle, Louisville, KY 40245 & Destination Address of  
7216 Edmonson Place, Prospect, KY 40059

Below, briefly state the facts of your complaint (if necessary, use additional paper). Please attach copies of any papers involved (order blanks, warranties, credit card receipts or statements, contracts, advertisements, canceled checks, etc.). The information you provide will be used in our effort to resolve your problem and may be shared with the party against which you have complained. It may also be used to enforce applicable state laws. Under Kentucky's Open Records Act, this complaint will be available for public view upon request. Certain personal information such as account numbers are not subject to the Open Records Act.

	Description of article	Description of Damages	Did Margaret's pack this item?	Estimated Weight	Original Cost	Date Acquired	Amount Claimed
	<b>Origin Address:</b> Large Glass Vase	Broken by Tevin. Witnessed by Jimmy	No. It was sitting on the kitchen desk.	5 lbs	\$50.00	6/7/15	\$50.00
	<b>Origin Address:</b> 2 <sup>nd</sup> Floor & Stairwell Walls, 1 <sup>st</sup> Floor Ceiling	Scratches, dents. Marring by washing machine hose, blood on walls from Trey	Yes	N/A	\$1,500	Painted 9/2/16	\$820.00
	<b>Destination Address:</b> 1 <sup>st</sup> door floor, laundry room hallway walls, stairwell walls	Scratches, dents. Marring by washing machine hose. Garage wall punctured by Alex while pounding on work bench top	Yes	N/A	\$3,200	Painted 10/30/16	\$1,288
	Picture frame	Broken	Yes	N/A	\$50	N/A	\$50
	Birdhouse perch	Perch broken		N/A	\$50	03/05/15	\$50

**If Your Complaint is Regarding a Health Club Membership, Also Complete this Section.**WAS CONTRACT SIGNED? ☐ YES ☐ NO DATE OF CONTRACT \_\_\_\_\_ LENGTH OF CONTRACT: YEARS \_\_\_\_\_ MONTHS \_\_\_\_\_

TIME LEFT BEFORE CONTRACT EXPIRES: YEARS \_\_\_\_\_ MONTHS \_\_\_\_\_

TOTAL AMOUNT OF YOUR CONTRACT \$ \_\_\_\_\_ AMOUNT PAID TO DATE: \$ \_\_\_\_\_

HOW WERE YOUR PAYMENTS TO BE MADE? ☐ MONTHLY ☐ YEARLY ☐ OTHER

AMOUNT OF EACH PAYMENT? \$ \_\_\_\_\_ WHEN WAS YOUR LAST PAYMENT? \_\_\_\_\_

HAVE YOU MADE PAYMENTS TO ANY COMPANY OTHER THAN THIS HEALTH CLUB? ☐ YES ☐ NO

If yes, please provide the following information:

NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

The above information is true and accurate to the best of my knowledge.

TODAY'S DATE 04/19/17

YOUR SIGNATURE

**OPTIONAL- COMPLETION OF THIS SECTION IS****VOLUNTARY**AGE OF THE PERSON INVOLVED IN THE TRANSACTION: ☐ 0-15 ☐ 16-25 ☐ 26-39 ☐ 40-59 ☐ 60-75 ☐ 76-over

*The Office of the Attorney General does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or the provision of service and provides, upon request, reasonable accommodations including auxiliary aids and services necessary to afford individuals with disabilities an equal opportunity to participate in all programs and activities.*



COMMONWEALTH OF KENTUCKY  
OFFICE OF THE ATTORNEY GENERAL  
FRANKFORT

E. D. W. HANCOCK  
ATTORNEY GENERAL

July 3, 1975

Mr. Joseph Muth  
Acting Manager  
Division of Occupation  
and Professions  
Executive Department for  
Finance and Administration  
Frankfort, Kentucky 40601

Dear Mr. Muth:

OAG 75 454

This office has received your June 17, 1975 request for an opinion on behalf of the State Board of Examiners of Speech Pathology and Audiology concerning the use of titles such as "Certified Hearing Aid Audiologist," "Licensed Hearing Aid Audiologist," and "Hearing Aid Audiologist," by licensed hearing aid dealers.

In KRS 334A.020(6), an "audiologist" is defined as one who "practices audiology" and is given the right to describe himself to the public as an "audiologist." Subsection (7) of that section defines in detail what constitutes the practice of audiology. Another section, KRS 334A.030(2), states as follows:

"No person shall practice or represent himself as a speech pathologist or audiologist in this state unless he is licensed in accordance with the provisions of this law."

While KRS 334A.040(2) provides that the chapter shall

Mr. Joseph Muth  
Page two

not operate to prevent licensed hearing aid dealers from "engaging in those practices and procedures used solely for the fitting and selling of hearing aids," there is nothing in either that chapter or the hearing aid dealer licensure act, KRS Chapter 334, which would warrant use of the titles you mention. In fact, KRS 334.120(2)(c)(5) specifies that grounds for suspension or revocation of hearing aid licensure include using the term "clinical audiologist . . . or similar words, abbreviations or symbols which give the impression that service is being provided by persons trained in . . . audiology . . . when such is not accurate."

It is, therefore, our opinion that use of the title "audiologist" in any form by one not licensed under KRS Chapter 334A is illegal. Anyone currently doing so is, therefore, acting at the risk of being subjected to the penalties specified in KRS 334A.990. Furthermore, if the person is a licensed hearing aid dealer, the Kentucky Board for Licensing Hearing Aid Dealers would have grounds to revoke or suspend that licensure. It is, moreover, our opinion that the use of the word "audiologist" by such individuals is false, misleading, and deceptive to the public and thus in violation of the Consumer Protection Act, KRS 367.170.

Of course, we are assuming that none of the hearing aid dealers you mention are licensed under KRS Chapter 334A. Certainly, there is no prohibition on dual licensure, in which case there would be no objection to such advertising.

Very truly yours,

ED W. HANCOCK  
ATTORNEY GENERAL

*Mary Ann Delaney*  
By: Mary Ann Delaney  
Assistant Attorney General

MAD:gm





COMMONWEALTH OF KENTUCKY  
OFFICE OF THE ATTORNEY GENERAL

STEVEN L. BESHEAR  
ATTORNEY GENERAL

August 9, 1982

CAPITOL BUILDING  
FRANKFORT 40501

R. B. Thompson, D.M.D.  
Executive Director  
Kentucky Board of Dentistry  
2106 Bardstown Road  
Louisville, Kentucky 40205

QAG82 430

Dear Dr. Thompson:

This letter is in response to your letter of June 22, 1982, requesting an opinion on whether an out-of-state dentist, not licensed in Kentucky, may advertise in the yellow pages of a Kentucky phone book. Your question centers around KRS 313.010 (2). That section reads as follows:

"(2) Any person shall be regarded as 'practicing dentistry' who, for a fee, salary or other reward paid, or to be paid either to himself, or to another person, performs or advertises to perform, dental operations of any kind, or who diagnoses or treats diseases or lesions of human teeth or jaws, or attempts to correct malpositions thereof, or who diagnoses or treats disorders, or deficiencies of the oral cavity and adjacent associated structures, or who takes impressions of the human teeth or jaws to be used directly in the fabrication of any intraoral appliance, or shall construct, supply, reproduce or repair any prosthetic denture, bridge, artificial restoration, appliance or other structure to be used or worn as a substitute for natural teeth, except upon the written laboratory procedure work order of a licensed dentist and constructed upon or by the use of casts or models made from an impression taken by a licensed dentist, or who shall advertise, offer, sell or deliver any

82-430

R. B. Thompson, D.M.D.

Page 2

such substitute or the services rendered in the construction, reproduction, supply or repair thereof to any person other than a licensed dentist, or who places or adjusts such substitute in the oral cavity of another, or who uses the words 'dentist,' 'dental surgeon,' the letters 'D.D.S.,' 'D.M.D.,' or other letters or title in connection with his name, which in any way represents him as being engaged in the practice of dentistry." [Emphasis added].

It is implicit in the Dental Act that the license issued under the authority of the Act is for the practice of dentistry in the Commonwealth of Kentucky. The practice of dentistry as defined in KRS 313.010(2) includes advertising "to perform dental operations of any kind." The question then is, is the advertising by an out-of-state dentist in the Commonwealth, to perform dental operations outside the Commonwealth, the practice of dentistry within the Commonwealth. As has been stated the Dental Act grants a license to qualified individuals to practice dentistry only within the Commonwealth. The purpose of the Act is to regulate licensees within the Commonwealth and protect Kentucky citizens from acts performed, by unlicensed individuals, in the Commonwealth.

Since the individual advertising is offering to perform the dental procedures outside the Commonwealth it would appear that the dental licensing statutes would not be applicable. This is not to imply that individuals may advertise in Kentucky to perform dental acts outside Kentucky, in any fashion they may desire. Any such advertising, which is deceptive, would be subject to the Kentucky Consumer Protection Act and action by the Attorney General's Division of Consumer Protection. In addition, the individual so advertising must be in conformity with the licensing laws of the state within which he or she is offering to perform the dental acts. Violations of those statutes should be reported to the licensing state of the advertiser or the state in which the advertiser has offered to perform the dental acts.

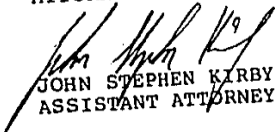
82-130

R. B. Thompson, D.M.D.

Page 3

Should the advertiser begin to perform dental acts within the Commonwealth, or advertise to perform dental acts within the Commonwealth, then the Kentucky dental licensing law would be applicable.

Very truly yours,

STEVEN L. BESHEAR  
ATTORNEY GENERAL  
JOHN STEPHEN KIRBY  
ASSISTANT ATTORNEY GENERAL

JSK/sd

Kentucky Transportation Cabinet  
 Dept. of Vehicle Regulation/Division of Motor Carriers  
 P.O. Box 2007, Frankfort, KY 40602-2007  
 (502) 564-1257 Fax (502) 564-4138 (8:00 AM-4:30 PM EST)  
 Walk-ins 8:00 AM-4:00 PM  
 TRANSPORTATION.KY.GOV/DMC

RECEIVED  
 DEPT/VEHICLE REGULATION

2015 JAN 12 P 12:00

MARGARET'S MOVERS INC.  
 MARGARET'S MOVING & STORAGE  
 P O BOX 2864  
 LOUISVILLE

KY 40201

### 2015 KENTUCKY INTRASTATE HOUSEHOLD GOODS CERTIFICATE RENEWAL

THIS CERTIFICATE MUST BE RENEWED BEFORE JANUARY 1st OF EACH CALENDAR YEAR  
 DOT# 1325076 CO# H0178 CERTIFICATE# C3867  
 PHONE# 502-584-5234 FAX# 502-371-0615 E-MAIL MARGARET@MARGARETSMOVING.C  
 SITUS: LOUISVILLE

Kentucky Intrastate For-Hire Household Goods Certificates require a renewal fee of \$250.00 and a fee of \$10.00 per vehicle. If your company has a Kentucky Intrastate For-Hire Authority to transport freight, please submit a 2015 copy of your XRS-3. The 2015 XRS-3 will be accepted in lieu of the \$10.00 per vehicle fee. If your company has registered for Unified Carrier Registration (UCR) you may also submit the 2015 UCR receipt. The 2015 UCR receipt will be accepted in lieu of the \$10.00 per vehicle fee.

#### FEE CALCULATION

A. Total number of certificates being renewed 1 X \$250.00 = \$ 250<sup>00</sup>

B. Total number of vehicles being renewed 6 X \$10.00 = \$ 60<sup>00</sup>

Total of A and B = \$ 310<sup>00</sup>

C. A copy of the XRS-3 2015 receipt is attached in lieu of the vehicle fee YES ☐ NO ☒ or

A copy of the UCR 2015 receipt is attached in lieu of the vehicle fee YES ☐ NO ☐

Please make all fees payable to "Kentucky State Treasurer". If you do not own the vehicle(s), a TC95-15 form, Equipment Lease, must be submitted with the renewal request.

The undersigned hereby files application for renewal of Kentucky Intrastate Household Goods Certificate with Kentucky. This authorization shall remain in effect until expired by law or revoked by the Kentucky Transportation Cabinet. Any vehicle operated under this authority must carry a Kentucky Insurance Receipt. I certify that I have access to and am familiar with all applicable regulations of the U.S. Department of Transportation relating to the safe operation of commercial vehicles and the safe transportation of hazardous materials and I will comply with these regulations.

Signature Margaret Weather Print Name MARGARET WEATHER  
 CR#150389 TR#370072 \$250.00

(63) 250.00  
 (61) 60.00  
 25-CI-00771 08/11/2025  
 C3867

Kathryn Marshall, Franklin Circuit Clerk

CERT# C3867  
 CR#150389 TR#370073

Ex. 6

\$60.00



**Steven L. Beshear**  
Governor

**TRANSPORTATION CABINET**

Frankfort, Kentucky 40622  
www.transportation.ky.gov/

**Michael W. Hancock, P.E.**  
Secretary

MARGARET'S MOVERS INC.  
MARGARET'S MOVING & STORAGE  
P O BOX 2864  
LOUISVILLE

KY 40201

EXP DATE: 12/31/2015

KENTUCKY INTRASTATE HOUSEHOLD GOODS CERTIFICATE

COMPANY#: H0178 DOT#: 1325076 CERT#: 3867

This certificate authorizes the transportation of Household Goods between points in Kentucky with a Situs in LOUISVILLE

DIVISION OF MOTOR CARRIERS  
P O BOX 2007  
FRANKFORT, KENTUCKY  
(502) 564-4127



104 E BRECKINRIDGE STREET  
LOUISVILLE, KY, 40203

FIND US ON:



CALL US!  
502-584-5234

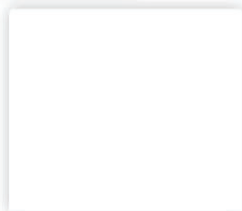
Home Moving Services Meet Our Staff Blog **History** Storage Photo Gallery Employment Contact Us



## Our History



Contact





2020 September - Covid took a toll on everyone including us. We downsized back to our original warehouse aka "our roots"!

2013 December~Won WHAS Best of Kentuckiana AGAIN!

2013 December~Partnered with the Marine Corp Toys for Tots program & collected toys at various parties and the annual Marine Corp Toys for Tots Motorcycle Run at Papa Johns Stadium. Collected more than 10,000 toys.

2013 December~Partnered with the Salvation Army Angel Tree program and picked up & delivered approximately 7000 adopted angels gifts from local malls to the Salvation Army processing center.

2013 November~Assisted the Marine Corp Toys for Tots program in purchasing \$10,000 in toys at a local Toys R Us!

2013 May~Performed collection/moving services for community recycling program for The Energy Pros of Louisville!

2013 May~Enrolled Rhonda, Suzanne, Cheyanne & Jason in the Certified Moving Consultant Designation Program w/ AMSA

2013 April~Cheered on the Kentucky Derby Marathon runners outside our office. Check out our photo gallery for pictures!

2013 April~Moved 2013 University of Louisville Cardinals NCAA Championship Basketball & Hall of Fame Coach, Rick Pitino

2013 April~Recertified as a Female Business Enterprise with the Louisville/Jefferson County Human Relations Commission

2013 March~Procured additional and larger storage facilities

2013 March~Crystal, Magan & Jason earn their COIC Designation through AMSA

2013 February~Presented with an award from the Salvation Army for our time and resources making the Angel Tree and Toys for Tots Programs each a success.

2012 November 25-December 10~Partnered with the Salvation Army Angel Tree to collect the boxes of toys donated daily at the 3 area Louisville malls for sorting and fulfillment at the Salvation Army Male campus

2012 November 27~Collected two 26 foot trucks full of toys for the "Toys for Tots Motorcycle Run, hosted by the Kentucky Motorcycle Association and The Marine Corps League

2012 November 26~Initiated a toy drive and collected cash donations and toys at the University of Louisville's Men's Football game vs UConn in 3OT game at Papa John's Cardinal Stadium

2012 November 25~Partnered with Toys for Tots and provided trucks and staffing to collect toys at the Light Up Louisville celebration at 4th Street

2012 November~Presented with award for #1 Penske agent in Louisville for the 3rd time in 3 years of being an agent

2012 October~Became the Official Mover of the University of Louisville Cardinals

2012 October~Partnered with KentuckianaWorks, JCTC & AMSA for the RAMP (Registered American Moving Professional) Program. Press conference with Louisville Mayor Greg Fischer and Representative John Yarmuth for program roll out in Kentucky, the first region in the US to start the program.

2012 September~Magan, Crystal and Jason enrolled in the AMSA Certified Office & Industrial Consultant program

2012 August~Magan & Crystal both earned their Certified Moving Consultant Designation w/ AMSA

2012 Won CityVoter BEST MOVER IN LOUISVILLE AGAIN!

2011 February~Took 3rd place in the WHAS Best of Kentuckiana

2011 January~Dustin earned the AMSA Certified Moving Consultant (CMC) designation

2010 November~Became members of the Kentucky Household Goods Carriers Association

2010 September~Became member of the Claims Prevention & Procedure Council (CPPC)

2010 September~Became members of the Progressive Claim Prevention

2010 August~Received Satisfactory Rating with Federal Motor Carrier Safety Administration (FMCSA)

2010 August~Featured in Business First of Louisville

2010 August~We became #1 Penske Agent in Louisville

2010 August~Became members of Greater Louisville Inc, Metro Louisville's Chamber of Commerce (GLI)

2010 May~Becky earned AMSA Certified Moving Consultant (CMC) designation

2010 March~Granted Jefferson County Public Schools 2 year renewable contract

2010 February~Contracted by Disney to move the baby grand piano used in the movie, "Secretariat".

2009 Winter~Partnered with Penske Truck Rentals, Leasing to become Authorized Agent

2009 Spring~Featured in Sullivan University's Herald

2009 Spring~Became only Louisville members of the Plastic Loose Fill Council (packing peanuts recycling)

2009 March~Margaret earned Kentucky's **only** AMSA Certified Office & Industrial Consultant (COIC) designation

2008 Member of American Moving & Storage Association (AMSA)

2008 September~Certified as a Female Business Enterprise by Louisville/Jefferson County

2008 August~WLKY Winner Best Mover in Louisville

2008 May~Granted Jefferson County Public Schools 2 year renewable contract

2008 May~Moved Muhammad & Lonnie Ali into their new Louisville home

2008 May~Margaret earned AMSA Certified Moving Consultant designation

2008 May~Moved to 104 E Breckinridge location and added greater storage capacity

2008 March~Featured in Business First of Louisville

2007 July~Received Satisfactory Rating with Federal Motor Carrier Safety Administration (FMCSA)

2007 June~Received Interstate Authority

2006 February~LEAP Wireless Intl Corp contracted us to place the new Cricket telecommunications tower, just in time for Cricket Wireless to go live in Louisville, KY!

2006 Began offering storage to our list of services

2004 Partnered with Uhaul Inc to become Authorized Dealer

2004 Opened April 2004

BROWSE OUR WEBSITE

Home

Moving Services

Meet Our Staff

Blog

History

Storage

Photo Gallery

Employment

Contact Us

CONTACT INFORMATION

PHONE: 502-584-5234

ADDRESS: 104 E Breckinridge St, Louisville, KY 40203

HOURS OF OPERATION:

Mon - Fri

8:00 am - 5:00 pm

Saturday

8:00 am - 2:00 pm

Sunday

Closed

VISA

MASTERCARD

DISCOVER

AMERICAN EXPRESS

GREEN DOT

FIND US ON:

f

OUR LOCATION

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**COMMONWEALTH OF KENTUCKY**  
**48<sup>th</sup> JUDICIAL CIRCUIT**  
**FRANKLIN CIRCUIT COURT, DIV. \_\_\_\_**  
**CIVIL ACTION NO: \_\_\_\_\_**

*Electronically Filed*

**COMMONWEALTH OF KENTUCKY**  
***ex rel.* RUSSELL COLEMAN ATTORNEY GENERAL**

**PLAINTIFF**

**v.**

**MARGARET'S MOVERS, INC. et al.**

**DEFENDANT**

**ORDER GRANTING COMMONWEALTH'S MOTION FOR**  
**TEMPORARY RESTRAINING ORDER**

This matter having come before the Court on the Commonwealth's Motion for Temporary Restraining Order, and the Court being otherwise sufficiently advised, the Court hereby **GRANTS** the Commonwealth's Motion and Orders the following:

1. Margaret Weathers and Margaret's Moving Inc. d/b/a Margarets Movers Inc d/b/a Margaret's Movers Inc. d/b/a Margaret's Moving and Storage, and its agents, employees, and those acting in active concert or participation with them shall hereafter be enjoined and restrained from doing the following, either directly or indirectly, until further order of this Court:
  - a. Conducting new business in Kentucky. This prohibition includes advertising or soliciting (including through its website) any business related to moving and storage services in Kentucky and surrounding areas. This prohibition also includes entering into any new contracts with Kentucky consumers;
  - b. Moving commercial and residential furniture or home goods within the state of Kentucky and surrounding areas;
  - c. Requesting, demanding, or receiving additional money from current customers on current projects;
  - d. Liquidating any stored furniture, home goods, or any personal property that is in their possession and under their care;
  - e. Relocating any furniture, home goods, or any personal property from any of the storage locations used within the past ten years; and

- f. Disposing of or concealing any documents or evidence relevant to this action including, but not limited to, location of storage units, furniture, home goods, personal property, business records, telephone records, email records, and financial records.

So **ORDERED**.

\_\_\_\_\_  
Judge, Franklin Circuit Court

\_\_\_\_\_  
Date



Case #: **25-CI-00771**

Court: **CIRCUIT**

County: **FRANKLIN**

## CIVIL SUMMONS

*Plaintiff, COMMONWEALTH OF KENTUCKY VS. MARGARET'S MOVING INC. ET AL, Defendant*

**TO: MARGARET'S MOVING INC.  
104 E. BRECKRINRIDGE STREET  
LOUISVILLE, KY 40211**

The Commonwealth of Kentucky to Defendant:

You are hereby notified that a **legal action has been filed against you** in this Court demanding relief as shown on the document delivered to you with this Summons. **Unless a written defense is made by you or by an attorney on your behalf within twenty (20) days** following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached complaint.

The name(s) and address(es) of the party or parties demanding relief against you or his/her (their) attorney(s) are shown on the document delivered to you with this Summons.

*Kattinger Marshall*

Franklin Circuit Clerk

Date: **8/11/2025**

### Proof of Service

This Summons was:

☐ Served by delivering a true copy and the Complaint (or other initiating document)

To: \_\_\_\_\_

☐ Not Served because: \_\_\_\_\_

Date: \_\_\_\_\_, 20\_\_\_\_

\_\_\_\_\_  
Served By

\_\_\_\_\_  
Title





Case #: **25-CI-00771**

Court: **CIRCUIT**

County: **FRANKLIN**

## CIVIL SUMMONS

*Plaintiff, COMMONWEALTH OF KENTUCKY VS. MARGARET'S MOVING INC. ET AL, Defendant*

**TO: MARGARET WEATHERS  
609 CECIL AVENUE  
LOUISVILLE, KY 40211**

The Commonwealth of Kentucky to Defendant:

You are hereby notified that a **legal action has been filed against you** in this Court demanding relief as shown on the document delivered to you with this Summons. **Unless a written defense is made by you or by an attorney on your behalf within twenty (20) days** following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached complaint.

The name(s) and address(es) of the party or parties demanding relief against you or his/her (their) attorney(s) are shown on the document delivered to you with this Summons.

*Kattinger Marshall*

Franklin Circuit Clerk

Date: **8/11/2025**

### Proof of Service

This Summons was:

☐ Served by delivering a true copy and the Complaint (or other initiating document)

To: \_\_\_\_\_

☐ Not Served because: \_\_\_\_\_

Date: \_\_\_\_\_, 20\_\_\_\_

\_\_\_\_\_  
Served By

\_\_\_\_\_  
Title





Commonwealth of Kentucky  
Kathryn Marshall, Franklin Circuit Clerk

Case #: 25-CI-00771

Envelope #: 11293875

Received From: JOHN GHAEIAN

Account Of: JOHN GHAEIAN

Case Title: COMMONWEALTH OF KENTUCKY VS.  
MARGARET'S MOVING INC. ET AL

Filed On 8/11/2025 7:51:01AM

Confirmation Number: commonwealth

#	Item Description	Amount
1	Court Facilities Fee	\$25.00
2	Court Facilities Fee	-\$25.00
3	Access To Justice Fee	-\$20.00
4	Access To Justice Fee	\$20.00
5	Money Collected For Others(Court Tech. Fee)	\$20.00
6	Money Collected For Others(Court Tech. Fee)	-\$20.00
7	Money Collected For Others(Attorney Tax Fee)	\$5.00
8	Money Collected For Others(Attorney Tax Fee)	-\$5.00
9	Library Fee	-\$3.00
10	Library Fee	\$3.00
11	Civil Filing Fee	\$150.00
12	Civil Filing Fee	-\$150.00
13	Charges For Services(Jury Demand / 12)	\$70.00
14	Charges For Services(Jury Demand / 12)	-\$70.00
TOTAL:		\$0.00

4145A41B-0448-4695-B8CC-47962B677BD9 : 000153 of 000153