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9	BEFORE TH	JE
10	DEPARTMENT OF CONS	UMER AFFAIRS
11	FOR THE BUREAU OF HOUSEHOL STATE OF CALI	
12		
13		
14		se No. HHM 2022-292
15	SANNAH VAN LINES, INC.; IBRAHIM KHALIFAH, CEO	
16	Orange, CA 92806 HO	CUSATION TO REVOKE DUSEHOLD MOVER PERMIT,
17	Household Mover Permit No. CAL-T OF	FATION WITH FINES, AND NOTICE SUSPENSION OF PERMIT BY
18 19	0192287 OP Respondent.	ERATION OF LAW
19 20		
20	PARTIES	
21	1. Complainant, Justin Paddock, brings this A	
23	the Chief of the Bureau of Household Goods and Servi	ices (Bureau), Department of Consumer
24	Affairs.	
25	2. On January 27, 2021, the Bureau issued He	ousehold Mover Permit Number CAL-T
26	0192287 to Sannah Van Lines, Inc. (Respondent SVL)	; Ibrahim Khalifah (Respondent Khalifah),
27	Chief Executive Officer (CEO). The Bureau suspende	ed Respondent's permit five times for
28	failure to pay fees or inadequate insurance coverage be	etween the following dates: (1) July 16,
	1	
		NAH VAN LINES, INC.; IBRAHIM KHALIFAH) DN, CITATION, AND NOTICE OF SUSPENSION

1	2021 to July 29, 2021, (2) January 14, 2022 to February 13, 2022, (3) July 15, 2022 to August 18,
2	2022, (4) December 16, 2022 to December 21, 2022, and (5) January 13, 2023 to the present. ¹
3	JURISDICTION
4	3. Complainant brings this Accusation before the Director of the Department of
5	Consumer Affairs (Director) for the Bureau, under the authority of the following laws. All
6	section references are to the Business and Professions Code unless otherwise indicated.
7	4. Section 118 states:
8	
9	(b) The suspension, expiration, or forfeiture by operation of law of a license issued by a board in the department, or its suspension, forfeiture, or cancellation by order of the board or by order of a court of law, or its surrender
10 11	without the written consent of the board, shall not, during any period in which it may be renewed, restored, reissued, or reinstated, deprive the board of its
12	authority to institute or continue a disciplinary proceeding against the licensee upon any ground provided by law or to enter an order suspending or revoking the
13	license or otherwise taking disciplinary action against the licensee on any such ground.
14	
15	(c) As used in this section, "board" includes an individual who is authorized by any provision of this code to issue, suspend, or revoke a license, and "license" includes "certificate," "registration," and "permit."
16 17	Authority of the Bureau.
17 18	5. Section 9810 states as follows:
19	(a)(1) There is in the Department of Consumer Affairs a Bureau of
20	Household Goods and Services, under the supervision and control of the director. The director shall administer and enforce the provisions of this chapter and
21	Chapter 3 (commencing with Section 19000) and Chapter 3.1 (commencing with Section 19225) of Division 8.
22	
23 24	(2) There is a Division of Household Movers within the bureau for purposes of administering [the Household Movers Act (Bus. & Prof. Code § 19225 <i>et seq.</i>)]. The Division of Household Movers shall be overseen by the chief of the
24 25	bureau.
26	¹ The Federal Motor Carrier Safety Administration (FMCSA) issued Respondent
27 28	license/permit No. FMCSA-DOT 3467713, authorizing it to move household goods in interstate moves outside California. However, as of at least March 15, 2024, Respondent's FMCSA-DOT license is "inactive," and Respondent is not authorized to transport or arrange the transportation of household goods either interstate or intrastate.
	(SANNAH VAN LINES, INC.; IBRAHIM KHALIFAH) ACCUSATION, CITATION, AND NOTICE OF SUSPENSION

1	
2	(c) Every power granted to or duty imposed upon the director under [the
2	Household Movers Act] may be exercised or performed in the name of the director by a deputy or assistant director or by the chief, subject to conditions and
4	limitations that the director may prescribe.
5	(d) Whenever the laws of this state refer to the Bureau of Electronic Repair
£	Dealer Registration or the Bureau of Electronic and Appliance Repair, the reference shall be construed to be to the Bureau of Household Goods and
6 7	Services.
/ 8	6. Section 19234.1 provides that protection of the public shall be the highest priority of
9	the Bureau in exercising its licensing, regulatory, and disciplinary functions under the Household
10	Movers Act.
11	Discipline Under the Household Movers Act.
12	7. Section 19228 establishes the transfer of authority from the Public Utilities
13	Commission to the Bureau as follows:
14	(a) Notwithstanding any other law, and until the time the director adopts
15	regulations implementing this chapter, powers granted to, or duties imposed on,
16	the Public Utilities Commission pursuant to the former Chapter 7 (commencing with Section 5101) of Division 2 of the Public Utilities Code [former Household
17	Goods Carriers Act] are transferred to, and may be exercised by, the director in administering this chapter.
18	
19	(c) Until the operative date of regulations implementing this chapter,
20	household movers shall observe the rules, regulations, general orders, and
21	Maximum Rate Tariff 4, as most recently amended as of July 1, 2018, by the Public Utilities Commission, that are administered and enforced by the director
22	pursuant to this chapter. A violation of those rules, regulations, general orders, or tariff may be grounds for discipline.
23	8. Section 19225.5 states:
24	
25	(h) "Howerhold mover" in the day are monoting and the interval
26	(h) "Household mover" includes every corporation or person, their lessees, trustee, receivers, or trustees appointed by any court whatsoever, engaged in the
27	permitted or unpermitted transportation for compensation or hire as a business by means of a motor vehicle or motor vehicles being used in the transportation of
28	used household goods and personal effects over any public highway in this state.
	3
	(SANNAH VAN LINES, INC.; IBRAHIM KHALIFAH) ACCUSATION, CITATION, AND NOTICE OF SUSPENSION

1 2	A broker, as defined in subdivision (a), shall be considered a household mover. The Legislature intends "household mover" to have the same meaning as "household goods carrier" in former Section 5109 of the Public Utilities Code, as that section read on June 30, 2018.
3	9. Section 19226 provides that any provision of the Public Utilities Code that conflicts
4	with the Household Movers Act does not apply to a household mover.
5	STATUTORY PROVISIONS
6	10. Section 119 states:
7	Any person who does any of the following is guilty of a misdemeanor:
8	
9	(a) Displays or causes or permits to be displayed or has in the person's possession either of the following:
10	(1) A canceled, revoked, suspended, or fraudulently altered license.
11	
12	As used in this section, "license" includes "certificate," "permit," "authority," and "registration" or any other indicia giving authorization to engage
13	in a business or profession regulated by this code or referred to in Section 1000
14	or 3600.
15	11. Section 19237 states:
16	(a) A household mover shall not engage, or attempt to engage, in the business
17	of the transportation of used household goods and personal effects by motor vehicle over any public highway in this state, including by any means or media,
18 10	advertising, soliciting, offering, arranging as a broker, or entering into an agreement regarding the transportation of used household goods and personal effects, unless both of the following are satisfied:
19	
20 21	(1) For transportation of household goods and personal effects entirely within this state, there is in force a permit issued by the bureau authorizing those operations
22	
23	(2) For transportation of household goods and personal effects from this state to another state or from another state to this state, there is in force a valid
24	operating authority issued by the Federal Motor Carrier Safety Administration.
25	12. Section 19239.1 governs Workers' Compensation Insurance Coverage as follows:
26	(a) Except as provided for in subdivision (b), every household mover, as a
27	condition precedent to the issuance, reinstatement, reactivation, renewal, or continued maintenance of a permit, shall have on file with the bureau a current
28	continued maintenance of a permit, shan have on the with the bureau a current
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	(SANNAH VAN LINES, INC.; IBRAHIM KHALIFAH) ACCUSATION, CITATION, AND NOTICE OF SUSPENSION

1	and valid Certificate of Workers' Compensation Insurance or Certification of Self- Insurance in the applicant's or permitholder's business name
2	(b) This section does not apply to an applicant or permitholder who has no
3	employees, provided that the applicant or permitholder files a statement, under
4	penalty of perjury, stating that, in its operations as a household mover, it does not employ any person in any manner so as to become subject to the workers'
5	compensation laws of this state.
6	(d) If, after filing the statement described in subdivision (b), the household
7	mover becomes subject to the workers' compensation laws of this state, the
8	household mover shall promptly notify the bureau that the household mover is withdrawing its statement under subdivision (b), and shall simultaneously file the
9	certificate described in subdivision (a).
10	13. Section 19247 states, "Every household mover shall add a prominent link to its
11	Internet Web site that immediately directs all consumers to the bureau's Internet Web site."
12	14. Section 19275 states:
13	••••
14	(b) The bureau may revoke, in whole or in part, the permit of any household mover, after notice and an opportunity to be heard, for providing
15 16	false or misleading information on an application for a permit or for failure to comply with this chapter or with any order, rule, regulation, or tariff administered
17	by the bureau, or with any term, condition, or limitation of the permit.
17	
18 19	(d) The bureau may , suspend, or revoke the permit of any household mover upon , or intentional dishonesty for personal gain.
20	15. Section 19276 states, " during the period of its suspension, it is unlawful for a
21	household mover to conduct any operations as a household mover."
22	16. Section 19277 states:
23	(a) Every household mover and every officer, director, agent, or employee
24	of any household mover who violates or who fails to comply with, or who
25	procures, aids, or abets any violation by any household mover of any provision of this chapter or any rule or regulation administered by the bureau pursuant to this
26	chapter, or of any operating permit issued to any household mover, or who
20 27	procures, aids, or abets any household mover in its failure to obey, observe, or comply with any such rule, regulation, or operating permit, is guilty of a
28	misdemeanor, and is punishable by a fine of not more than two thousand five hundred dollars (\$2,500) or by imprisonment in the county jail for not more than
20	5
	(SANNAH VAN LINES, INC.; IBRAHIM KHALIFA ACCUSATION, CITATION, AND NOTICE OF SUSPENSI

1	three months, or both. If a violation is willful, each willful violation is punishable by a fine of not more than ten thousand dollars (\$10,000) or by imprisonment in
2 3	the county jail for not more than one year, or both. If the violation involves operating or holding oneself out as a household mover without a permit, the fine shall be not less than one thousand dollars (\$1,000).
4	(b) Any person who violates subdivision (a) of Section 19237, is guilty of a
т 5	misdemeanor, and is punishable by a fine of not more than ten thousand dollars
5 6	(\$10,000), by imprisonment in the county jail for not more than one year, or both, for each violation.
7	17. Section 19279.1 states:
8	Whenever the bureau finds that any person or corporation is operating as a
9	household mover without a valid permit, or is holding itself out as such a household mover without a valid permit in contravention of Section 19279.3, the
10	bureau may issue a citation and fine of not more than five thousand dollars (\$5,000) for each violation. The bureau may assess the person or corporation an
11	amount sufficient to cover the reasonable expense of investigation incurred by the bureau.
12	
13	18. Section 19279.2 states:
14	Every corporation or person other than a household mover who knowingly
15	and willfully, either individually, or acting as an officer, agent, or employee of a corporation, copartnership, or any other person other than a household mover, violates any provision of this chapter or fails to observe, obey, or comply with any
16	order, decision, rule, regulation, direction, demand, or requirement administered
17	by the bureau pursuant to this chapter, or who procures, aids, or abets any household mover in its violation of this chapter, or in its failure to obey, observe,
18	or comply with any such order, decision, rule, regulation, direction, demand, or requirement, is subject to a citation and fine of not more than five hundred dollars
19 20	(\$500) for each offense.
20 21	19. Section 19279.3 states:
22	Every corporation or person who knowingly and willfully issues, publishes,
23	or affixes, or causes or permits the issuance, publishing, or affixing, of any oral or written advertisement, broadcast, or other holding out to the public, or any portion
24	thereof, that the corporation or person is in operation as a household mover
25	without having a valid permit issued under this chapter is guilty of a misdemeanor punishable by a fine of not more than two thousand five hundred dollars (\$2,500).
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	(SANNAH VAN LINES, INC.; IBRAHIM KHALIFAH) ACCUSATION, CITATION, AND NOTICE OF SUSPENSION

1	20.	Section 19281 provides that every violation of the Household Movers Act is a
2	separate an	nd distinct offense, and each day's continuance thereof is a separate and distinct
3	offense.	
4	21.	Section 19282 states:
5		All remedies and penalties accruing under this chapter are cumulative to each
6		her and to the remedies and penalties available under any other law, and a suit the recovery of one remedy or penalty does not bar or affect the recovery of
7	any	y other remedy, penalty, or forfeiture or bar any criminal prosecution against y person or corporation, or any officer, director, agent, or employee thereof, or
8		y other corporation or person.
9	22.	Section 19288 states:
10		(a) On and after the effective date of this article, there is imposed upon
11	eve	ery household mover, , a permit fee that shall be paid to the bureau.
12		(2) Until the adoption of fees by the bureau pursuant to paragraph (1),
13		every household mover, and every person or corporation, owning or operating motor vehicles in the transportation of property for hire upon the
14		public highways, under the jurisdiction of the bureau, shall pay to the bureau
15 16		a permit fee equal to one-tenth of 1 percent of gross operating revenue, which shall be payable to the bureau in the manner and at the times provided for the payment of the fee provided in Section 5003.1 of the Public Utilities Code.
17		For purposes of this paragraph, "gross operating revenue" shall be the gross operating revenue defined in Section 5002 of the Public Utilities Code. It is
18		the intent of the Legislature that the fee imposed by this paragraph will be equivalent to the fee imposed pursuant to Section 5328 of the Public Utilities Code as of June 30, 2018.
19	23.	Section 19288.1 states:
20		
21		Until the adoption of fees by the bureau pursuant to Section 19288, every usehold mover shall pay to the bureau the fees required pursuant to, and in the
22		unner specified in, Sections 5003.1 and 5003.2 of the Public Utilities Code. It is intent of the Legislature that the fees imposed by this section shall be
23 24	-	uivalent to the fees collected by the Public Utilities Commission, and imposed rsuant to Sections 5003.1 and 5003.2 of the Public Utilities Code, as of
24 25	Sej	ptember 1, 2017. The fees to be paid by household movers as specified in this ction are in addition to the fee specified in paragraph (2) of subdivision (b) of
23 26	See	ction 19288.
20	///	
27	///	
20		7
		(SANNAH VAN LINES, INC.; IBRAHIM KHALI ACCUSATION, CITATION, AND NOTICE OF SUSPEN

(SANNAH VAN LINES, INC.; IBRAHIM KHALIFAH) ACCUSATION, CITATION, AND NOTICE OF SUSPENSION

1	24. Section 19288.2 states:
2	(a) If a household mover is in default on the payment of the fees prescribed
3	by this chapter for a period of 30 days or more, the bureau may suspend or revoke the household mover's permit Upon payment of the estimated fee and the
4	penalty, the permit shall be reinstated.
5	
6	(c) Upon the revocation of any permit issued to a household mover subject to
7	this chapter, all fees provided for by this chapter shall become due and payable immediately.
8 9	LABOR CODE
10	25. Labor Code section 3300, subdivision (c), provides that "employer" means every
11	person, which has any natural person in service.
12	26. Labor Code section 3351 provides that "employee" means every person in the service
13	of an employer under any appointment or contract of hire or apprenticeship, express or implied,
14	oral or written, whether lawfully or unlawfully employed, among others.
15	27. Labor Code section 3357 states, "Any person rendering service for another, other than
16	as an independent contractor, or unless expressly excluded herein, is presumed to be an
17	employee."
18	CODE OF CIVIL PROCEDURE
19	28. Code of Civil Procedure section 116.540 governs appearances by non-attorneys in
20	small claims court as follows:
21	(a) Except as permitted by this section, no individual other than the plaintiff
22	and the defendant may take part in the conduct or defense of a small claims action.
23	(b) Except as additionally provided in subdivision (i), a corporation may
24	appear and participate in a small claims action only through a regular employee, or a duly appointed or elected officer or director, who is employed, appointed, or
25	elected for purposes other than solely representing the corporation in small claims
26	court.
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(j) At the hearing of a small claims action, the court shall require any individual who is appearing as a representative of a party under subdivisions (b) to (i), inclusive, to file a declaration stating (1) that the individual is authorized to appear for the party, and (2) the basis for that authorization. If the representative is appearing under subdivision (b), (c), (d), (h), or (i), the declaration also shall state that the individual is not employed solely to represent the party in small claims court. If the representative is appearing under subdivision (e), (f), or (g), the declaration also shall state that the representative is serving without compensation, and has appeared in small claims actions on behalf of others no more than four times during the calendar year.

COST RECOVERY

29. Section 125.3 provides that the Bureau may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case, with failure of the licensee to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be included in a stipulated settlement.

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FACTUAL ALLEGATIONS

30. On or about January 25, 2021, Respondent Khalifah, as an officer of Respondent SVL
and on its behalf, submitted a Workers' Compensation Declaration form certifying under penalty
of perjury, that Respondent SVL did not employ anyone in the manner subject to workers'
compensation laws of the State of California. Respondents certified, "I DO NOT HAVE ANY
EMPLOYEES. If I hire employees in the future, I will submit an amended Workers'
Compensation Declaration Form to the Bureau. . . ."

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Respondent SVL has never submitted an amended Workers Compensation
 Declaration Form to the Bureau.

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32. On June 27, 2022, a Bureau investigator called Respondent SVL and spoke to HK, an individual who identified herself as Respondent SVL's account manager. The investigator discussed two consumer complaints received by the Bureau with HK. HK was familiar with the complaints, explained Respondent SVL had submitted the complaints to Respondent SVL's third party facilitator, and the claims were pending. When the investigator inquired about where

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Respondent SVL's principle place of business was located, she recommended the investigator contact Respondent Khalifah.

33. On November 16, 2022, in a civil case entitled Johnson v. Sannah Van Lines, Inc. 3 (Super. Ct. Orange County, 2022, No. 30-2022-01266887-SC-SC-CJC), a consumer sued 4 5 Respondent SVL in small claims court for breach of contract. Saida Khalmenova personally appeared for Respondent SVL, argued on behalf of it, and provided the court with an oral 6 declaration that she was Respondent SVL's "authorized representative" for purposes of the small 7 claims proceeding. 8

9 34. On or about January 13, 2023, the Bureau suspended Respondent SVL's permit 10 because it had not paid the required fees to maintain an active permit.

35. On February 14, 2023, the Bureau investigator confirmed that Respondent SVL 11 maintained an active website at www.sannahvanlines.com. It falsely represented that it was 12 authorized to perform household moves within California by displaying its household mover 13 14 permit number (CAL-T0192287). It invited consumers to call its customer service/dispatch phone number, and promised that one of its "Moving consultants will be contacting you ASAP." 15 Respondent SVL's website does not contain or display any link that immediately directs 16 consumers to the Bureau's internet website. 17

36. Also on February 14, 2023, the Bureau's investigator discovered that Respondent 18 SVL advertised on a website called "mymovingreviews.com," where Respondent SVL admits it 19 operates in California and discloses that its business address is on N. Kraemer Blvd. in Anaheim.² 20

37. As of at least March 19, 2024, Respondent also maintained a social media presence 21 on Instagram at https://www.instagram.com/sannahvanlines/, where it displays its California 22 permit number, phone number, and email. A video posted to Respondent SVL's Instagram site 23 24 states, "Sannah Van Lines is a professional and efficient moving carrier that was established in 1999 that specializes in intrastate and interstate moves. . . . [¶] . . . Our movers go through 25 extensive training to ensure your belongings are packed and padded appropriately for your move 26

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² https://www.mvmovingreviews.com/movers/sannah-van-lines-inc-31759 10

1	in transportation" The video invites consumers to "contact us via email or a phone for your
2	quote today."
3	FIRST CAUSE FOR DISCIPLINE AND
4	CITATION AND FINE
5	(Violation of Household Mover Act - Failure to Have Valid Permit)
6	(Against Respondent SVL)
7	38. Complainant incorporates paragraphs 30-37 by reference as if set forth in full herein.
8	39. Respondent SVL's household mover permit is subject to discipline under Section
9	19275, subdivision (b), because it violated Sections 19237, subdivision (a)(1); and 19279.1, when
10	it failed to have in force a permit issued by the Bureau. Respondent engaged in or attempted to
11	engage in the business of transporting used household goods and personal effects by motor
12	vehicle over California public highways when it advertised, solicited, offered, or arranged
13	transportation of used household goods and personal effects without a valid permit issued by the
14	Bureau.
15	Citation and Fine Related to Unpermitted Conduct.
16	40. Under Sections 19279.1, 19281, and 19282, Respondent SVL is subject to citation
17	and fines for continuing violations, and each day's continuance is a separate and distinct offense,
18	for its conduct as an unpermitted household mover, subjecting Respondent SVL to fines of
19	\$5,000.00/day since at least February 14, 2023.
20	SECOND CAUSE FOR DISCIPLINE
21	<u>AND</u> <u>CITATION AND FINE</u>
22	(Violation of Household Mover Act - Unlawful Advertisements)
23	(Against Respondent SVL)
24	41. Complainant incorporates paragraphs 30-37 by reference as if set forth in full herein.
25	42. Respondent SVL's household mover permit is subject to discipline under Section
26	19275, subdivision (b), because it violated Sections 19279.3 when it engaged in unlawful
27	advertising. Respondent SVL knowingly and willfully published, caused, or permitted the
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	(SANNAH VAN LINES, INC.; IBRAHIM KHALIFAH) ACCUSATION, CITATION, AND NOTICE OF SUSPENSION

1	publishing of written advertisements where it held itself out to the public in operation as a
2	household mover without having a valid permit on:
3	a. Its own website;
4	b. Its Instagram site; and
5	c. On mymovingreviews.com's website.
6	Citation and Fine for Unpermitted Conduct.
7	43. Under Sections 19279.1, 19279.3, and 19282, Respondent SVL is subject to citation
8	and fines for continuing violations, and each day's continuance is a separate and distinct offense,
9	for its conduct as an unpermitted household mover, subjecting Respondent to fines of
10	\$5,000.00/day since February 14, 2023.
11	THIRD CAUSE FOR DISCIPLINE,
12	<u>NOTICE OF SUSPENSION OF PERMIT BY OPERATION OF LAW,</u> AND
13	CITATION AND FINE
14	(Violation of Household Movers Act – Workers' Compensation Violations)
15	(Against Respondent SVL)
16	44. Complainant incorporates paragraphs 30-37 by reference as if set forth in full herein.
17	45. Respondent SVL's household mover permit is subject to discipline under Section
18	19275, subdivision (b), because it violated Sections 19239.1 and 19239.4, subdivisions (a) and
19	(d). Since at least June 27, 2022, Respondent SVL failed to obtain or maintain workers'
20	compensation insurance coverage. Respondent SVL became subject to the workers'
21	compensation laws of California, and failed to promptly withdraw its Workers' Compensation
22	Declaration in violation of Section 19239.1, subdivision (d). It also failed to simultaneously file a
23	valid Certificate of Workers' Compensation Insurance or Certification of Self-Insurance.
24	Respondent's employees subjecting it to the Workers' Compensation laws of California include,
25	but are not limited to: HK, Ms. Khalmenova, and the employees it admits to training in its video
26	posted to Respondent SVL's Instagram site.
27	///
28	///
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	(SANNAH VAN LINES, INC.; IBRAHIM KHALIFAH) ACCUSATION, CITATION, AND NOTICE OF SUSPENSION

⁽SANNAH VAN LINES, INC.; IBRAHIM KHALIFAH) ACCUSATION, CITATION, AND NOTICE OF SUSPENSION

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Suspension by Operation of Law.

2 46. Respondent SVL's household mover permit is subject to suspension by operation of law under Section 19239.4, subdivision (a), because it failed to obtain or maintain workers' 3 compensation insurance coverage for its employees. The permit suspension shall be effective 45 4 5 days from the service of this Accusation and Notice of Suspension. The Bureau will post the pending suspension to the permit record for not more than 45 days prior to the posting of any 6 permit suspension period required under Article 2 of the Household Movers Act. Reinstatement 7 may be made at any time following suspension by showing proof of compliance as specified in 8 9 Sections 19239.1 and 19239.3, and complying with any and all other permitting requirements under the Household Movers Act. 10 Citation and Fine Related to Unpermitted Conduct. 11 47. Under Sections 19239.4, subdivision (e), and 19279.1, Respondent SVL is subject to 12 citation and fines for failing to obtain or maintain workers' compensation insurance for its 13 employees, in its capacity as an unpermitted household mover since January 13, 2023. Each day 14 since January 13, 2023, that Respondent SVL failed to obtain or maintain coverage is a 15 continuing violation, and a separate and distinct offense, subjecting Respondent SVL to fines of 16 \$5,000.00/day under Section 19279.1. 17 18 FOURTH CAUSE FOR DISCIPLINE AND 19 **CITATION AND FINE** 20(Aiding and Abetting Violation of Household Movers Act) 21 (Against Respondent Khalifah) 22 48. Complainant incorporates paragraphs 30-37 by reference as if set forth in full herein. 23 49. Respondent Khalifah is subject to citation and fine under Sections 19277, subdivision 24 (a), 19279, and 19279.2. Respondent Khalifah, as an individual, officer, director, agent, or 25 employee of Respondent SVL, aided and abetted Respondent SVL in its violations of the 26 Household Movers Act. 27 /// 28 13 (SANNAH VAN LINES, INC.; IBRAHIM KHALIFAH) ACCUSATION, CITATION, AND NOTICE OF SUSPENSION

1	Citation and Fine Related to Aiding and Abetting Unpermitted Conduct.
2	50. Under Sections 19279.2 Respondent Khalifah is subject to citation and fines for
3	continuing violations, and each day's continuance is a separate and distinct offense subjecting
4	Respondent Khalifah to fines of \$500.00/day since February 14, 2023.
5	FIFTH CAUSE FOR DISCIPLINE
6	(Intentional Dishonesty for Personal Gain)
7	(Against Respondent SVL)
8	51. Complainant incorporates paragraphs 30-37 by reference as if set forth in full herein.
9	52. Respondent SVL's household mover permit is subject to discipline under Section
10	19275, subdivision (d), because it engaged in intentional dishonesty for personal gain as follows:
11	a. Since February 14, 2023, on its website (<u>www.sannahvanlines.com</u>),
12	Respondent SVL falsely represented that it was authorized to perform household moves within
13	California by displaying its household mover permit number (CAL-T0192287) on its website;
14	and
15	b. Since February 14, 2023, on the website for mymovingreviews.com,
16	Respondent SVL falsely represented that it was authorized to perform household moves within
17	California by displaying its household mover permit number (CAL-T0192287) on its website.
18	SIXTH CAUSE FOR DISCIPLINE
19	(Displaying Suspended Permit)
20	(Against Respondent SVL)
21	53. Complainant incorporates paragraphs 30-37 by reference as if set forth in full herein.
22	54. Respondent SVL is subject to discipline under Section 119, subdivision (a)(1),
23	because it displayed, caused, or permitted the display of its suspended permit.
24	SEVENTH CAUSE FOR DISCIPLINE
25	(Violation of Household Mover Act - Failure to Provide Link to Bureau Website)
26	(Against Respondent SVL)
27	55. Complainant incorporates paragraphs 30-37 by reference as if set forth in full herein.
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	(SANNAH VAN LINES, INC.; IBRAHIM KHALIFAH) ACCUSATION, CITATION, AND NOTICE OF SUSPENSION

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1	56. Respondent SVL's household mover permit is subject to discipline under Section
2	19275, subdivision (b), because it violated Section 19247 when Respondent SVL failed to add a
3	prominent link to its website that immediately directed all consumers to the Bureau's internet
4	website.
5	EIGHTH CAUSE FOR DISCIPLINE
6	(Violation of Household Movers Act - Failure to Pay Fees)
7	(Against Respondent SVL)
8	57. Complainant incorporates paragraphs 30-37 by reference as if set forth in full herein.
9	58. Respondent SVL's household mover permit is subject to discipline under Section
10	19275, subdivision (b), because it failed to pay required permit fees under the Household Movers
11	Act as follows:
12	a. Section 19288, subdivisions (a) and (b)(2): Respondent SVL failed to pay to the
13	Bureau a permit fee; and
14	b. Section 19288: Respondent SVL failed to pay to the Bureau the fees required
15	and in the manner specified under former Public Utilities Code sections 5003.1 and 5003.2;
16	which are statutorily authorized and specifically in addition to the fees required under Section
17	19288, subdivision (b)(2).
18	DISCIPLINARY CONSIDERATIONS
19	59. In determining the degree of discipline against Respondent SVL and the imposition of
20	any fines against Respondent Khalifah individually, the fact finder should consider Respondents
21	SVL and Khalifah's failure to respond to Bureau inquiries during its investigation.
22	60. Section 19260.3 provides that the Bureau has authority to inspect and examine any
23	lands, buildings, equipment, accounts, books, records, and memoranda, including all documents,
24	papers, and correspondence kept or required to be kept by household movers.
25	61. Respondents SVL and Khalifah failed to communicate with or respond in good faith
26	to the Bureau investigator's attempts to contact Respondent Khalifah. On September 7, 2022,
27	January 11, 17, 30, and 31, 2023, the Bureau investigator left messages for Respondent Khalifah
28	instructing him to contact the investigator, but Respondent Khalifah never complied.
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	(SANNAH VAN LINES, INC.; IBRAHIM KHALIFAH) ACCUSATION, CITATION, AND NOTICE OF SUSPENSION

1	62. Respondents SVL and Khalifah's failure prevented Bureau investigators from
2	inspecting Respondent SVL's Santa Ana facility. Respondents SVL and Khalifah's failure
3	further caused unnecessary delay in the Bureau's investigation.
4	<u>PRAYER</u>
5	WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
6	and that following the hearing, the Director of Consumer Affairs issue a decision:
7	1. Revoking Household Mover Permit Number CAL-T 0192287, issued to Respondent
8	SVL; Respondent Khalifah, CEO;
9	2. Ordering Respondent SVL to pay the Bureau the reasonable costs of the investigation
10	and enforcement of this case, pursuant to Section 125.3;
11	3. Imposing citations and fines against Respondent SVL for continuing violations of the
12	Household Movers Act;
13	4. Imposing citations and fines against Respondent Khalifah for continuing violations of
14	the Household Movers Act;
15	5. Taking such other and further action as deemed necessary and proper.
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17	
18	DATED: October 2, 2024 JUSTIN PADDOCK
19	Bureau Chief Bureau of Household Goods and Services
20	Department of Consumer Affairs State of California
21	Complainant
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	16 (SANNAH VAN LINES, INC.; IBRAHIM KHALIFAH)
	ACCUSATION, CITATION, AND NOTICE OF SUSPENSION