



## Public Utilities Commission

STATE OF CALIFORNIA

### CITATION FOR VIOLATION OF PUBLIC UTILITIES CODE

To: Blackline Holdings Inc.  
Attn: Artak Aghajanyan



File: TCP 43342 B  
Citation #: T.24.01-008  
Date: January 24, 2024  
Case #: PSG-5939

#### VIOLATIONS

You are hereby cited with having violated section(s) of the Public Utilities (Pub. Util.) Code and a Commission General Order (G.O.) as described below. These violations occurred during the period of April 1, 2023 to August 11, 2023.

- (1) Failed to enroll 10 employee-drivers in the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) program, in violation of Pub. Util. Code Sections 5374(a)(1)(D) & 5381, and G.O. 157-E, Part 5.02. **[10 counts]**
- (2) Failed to enroll 10 employee-drivers in a mandatory Controlled Substance and Alcohol Testing Certification Program for Pre-Employment Testing, in violation of Pub. Util. Code Section 5374(a)(1)(I) and G.O. 157-E, Part 10. **[10 counts]**
- (3) Failed to maintain records, in violation of Pub. Util. Code Sections 5381.5 & 5389 and G.O. 157-E, Part 6.01. **[1 count]**

**STATEMENT OF FACTS**

The above violations are documented in the attached Investigation Report, which consists of the carrier's records and substantiating documents obtained from other sources.

**RESPONSE**

You are hereby called upon to answer this citation on or before February 14, 2024. By way of such answer, you may either:

- (1) Pay a fine of \$20,000 pursuant to P.U. Code Section 5378. (Submit your check or money order payable to California Public Utilities Commission using the attached *Citation Agreement*. Upon payment, the fine will be deposited in the State Treasury to the credit of the General Fund and the Commission staff will deem the matter closed, **or**
- (2) Contact the Supervisor below to make payment arrangements, **or**
- (3) Contest this Citation by filing an Appeal. See the attached document "*How to File an Appeal and Instructions for Filing a Notice of Appeal and Certificate of Service for a Citation Appeal.*"

If you fail to respond by February 14, 2024, you will be in default and will have forfeited your right to appeal the Citation. In addition, your operating authority will be immediately suspended and may be subsequently revoked pursuant to Resolution ALJ-187. The Commission may also act through a civil or criminal proceeding to recover any unpaid fine and ensure compliance with applicable statutes and Commission orders.

*Eric Hooks*

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Eric Hooks  
Program and Project Supervisor  
Consumer Protection and Enforcement Division  
Transportation Enforcement Branch  
Telephone number: (415) 703-2302  
E-mail address: [eric.hooks@cpuc.ca.gov](mailto:eric.hooks@cpuc.ca.gov)

Attachments

**INVESTIGATION REPORT**

**CARRIER:** Blackline Holdings Inc  
A California Corporation, 5474627 (Active)

**OFFICERS:** Artak Aghajanyan, Chief Executive Officer (CEO),  
Ani Hambardzumyan, Chief Financial Officer (CFO),  
Arayik Arakelyan, Assistant Secretary,  
Edik Hambardzumyan, Assistant Secretary,  
Tigran Nikoghosyan, Assistant Secretary, and  
Arthur Arakelyan, Director

**AUTHORITY:** PSG# 43342 B, Suspended June 21, 2023

**MAILING ADDRESS:** [REDACTED]

**PHONE/EMAIL:** [REDACTED] / [REDACTED]

**VEHICLES:** 0

**EMPLOYEE-DRIVERS:** 0

**PL&PD INSURANCE:** New York Marine and General Insurance Company  
Policy # [REDACTED]  
Cancellation Date: July 22, 2023

**WORKERS' COMPENSATION INSURANCE:** State Compensation Insurance Fund  
Policy # [REDACTED]  
Cancellation Date: August 14, 2023

**DRUG CONSORTIUM:** CM & Associates, Inc.

## INTRODUCTION

On July 28, 2023, I was assigned to investigate the operations and practices of Blackline Holdings Inc. (hereinafter referred to as Blackline) because of a Los Angeles International Airport Police Department complaint alleging that Blackline was involved in unfair business practices.

## VIOLATIONS

I investigated Blackline for the period of April 1, 2023, to August 11, 2023, and found violations of the following provisions of the Public Utilities (Pub. Util.) Code and a Commission General Order (G.O.):

- **Failed to enroll 10 employee-drivers<sup>1</sup> in the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) program, in violation of Pub. Util. Code Sections 5374(a)(1)(D) & 5381, and G.O. 157-E, Part 5.02 [10 counts].**

Pub. Util. Code section 5374(a)(1)(D) states in part that, “The applicant participates in a program to regularly check the driving records of all persons, whether employees or subcarriers, operating vehicles used in transportation for compensation.”

On November 21, 2023, Bezawit Dilgassa, Senior Enforcement Analyst of the Transportation Enforcement Branch (TEB) sent a Data Request letter to Uber, via the California Public Utilities Commission’s (CPUC) secured Kiteworks database, requesting waybills generated by Blackline during the review period [**Attachment 1**]. On December 27, 2023, Uber responded via Kiteworks, providing a spreadsheet showing Blackline had 10 employee-drivers [**Attachment 2 shows a sample of entries in a spreadsheet**]. A search of Blackline’s DMV EPN program with requester code [REDACTED] shows Blackline has been enrolled in the program since February 13, 2023. The program shows Blackline’s Director, Arthur Arakelyan (hereinafter referred to as Mr.

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<sup>1</sup> On December 27, 2023, Uber responded to CPED [REDACTED] data request and Uber provided a “Confidential [REDACTED] [REDACTED] was a spreadsheet (waybill log) from Uber showing Blackline had 33 drivers operating with the carrier. Due to the massive amount of data, a sample of 10 drivers for the following dates May 18-20, and June 15, 2023, will be used to substantiate the DMV EPN and Drug Program violation.



Arakelyan), as the only one enrolled in the program, but not the 10 employee-drivers listed in **Table 1 [Attachment 3 and Footnote 1]**. My investigation disclosed that Blackline’s 10 employee-drivers operated for 4 days and completed 242 trips without evidence of enrollment in the DMV EPN program [**Table 1 and Attachment 2**].

**Table 1 – Dates Driven without enrollment in DMV EPN Program**

<b>Number of Drivers</b>	<b>Driver</b>	<b>Dates of Operation</b>	<b>Total Trips</b>
1		5/18/23, 5/19/23, 5/20/23	31
2		5/18/23, 5/19/23, 5/20/23	22
3		5/18/23, 5/19/23, 5/20/23	9
4		5/18/23, 5/19/23, 5/20/23	22
5		5/18/23, 5/19/23, 5/20/23	30
6		5/18/23, 5/19/23, 5/20/23, 6/15/23	35
7		5/18/23, 5/19/23, 5/20/23, 6/15/23	37
8		5/18/23, 5/19/23, 5/20/23, 6/15/23	23
9		5/19/23, 5/20/23, 6/15/23	27
10		6/15/23	6
<b>Total</b>		<b>(4 different days)</b>	<b>242</b>

- **Failed to enroll 10 employee-drivers in a mandatory Controlled Substance and Alcohol Testing Certification Program for Pre-Employment Testing, in violation of Pub. Util. Code Section 5374(a)(1)(I) and G.O. 157-E, Part 10 [10 counts].**

G.O. 157-E, Part 10.01 states in part that, “All charter-party carrier applicants who propose to employ any driver who will operate a vehicle having a seating capacity of 15 persons or less, including the driver, must provide for a mandatory controlled substance and alcohol testing certification program for those drivers as required by the G.O. unless all such drivers are already covered by federal testing regulations.”

On August 22, 2023, a Data Request [**Attachment 4**] was sent to Blackline via U.S. certified mail with the attention to the CEO, Artak Aghajanyan (hereinafter referred to as Mr. Aghajanyan) requesting for Blackline’s current service agreement with their Drug Consortium and a list of all drivers enrolled showing dates added and/or deleted. On September 5, 2023, I received an email from Chris Delgado (hereinafter referred to as Mr. Delgado), Drug Consortium

Representative at CM & Associates, Inc., stating that he was writing on behalf of Mr. Aghajanyan of Blackline [Attachment 5]. In the email, Mr. Delgado stated that a drug test for one driver was submitted to the CPUC on February 23, 2023, and attached the Form PL 706-J (Controlled Substances and Alcohol Testing Certification Program), indicating that the 10 employee-drivers listed in Table 1 [Footnote 1] were not enrolled in the drug consortium program.

- **Failure to maintain records, in violation of Pub. Util. Code Sections 5381.5 & 5389 and G.O. 157-E, Part 6.01 [1 count].**

G.O. 157-E, Part 6.01 states in part that, “Every carrier shall institute and maintain in its offices, a set of records which reflect information as to the services performed, including waybills, as described in Section 3.01. Such records shall be maintained for a minimum period of three years.”

On August 22, 2023, a Data Request [see Attachment 4] was sent to Blackline via U.S. certified mail with the attention to Mr. Aghajanyan. On September 5, 2023, Mr. Delgado emailed a response to the Data Request, stating that he was writing on behalf of Mr. Aghajanyan of Blackline [see Attachment 5]. On September 8, 2023, I sent an email to Mr. Delgado and Blackline ([REDACTED]) requesting that Blackline submit in writing in what capacity Mr. Delgado represents Blackline. Mr. Delgado withdrew from the email correspondence and Blackline responded to my emails instead. There was never any confirmation from Blackline regarding Mr. Delgado’s connection with the company besides being their Drug Consortium Representative. I advised Blackline that the Data Request is still required and granted Blackline an extension of September 15, 2023.

On September 19, 2023, Blackline provided Form PL 706-J and Worker’s Compensation Insurance as attachments [Attachment 6]. On September 20, 2023, I requested, via email, that Blackline provide waybills, but I received only the LAX circuit charge report on the same day [Attachment 7] contains one representative sample]. On October 2, 2023, I contacted Blackline via telephone and email to inform them that the LAX circuit charge report was not a waybill and was unacceptable [see Attachment 7]. On December 27, 2023, Uber provided confidential records

**[Footnote 1]** showing Blackline had waybills for May 18, 2023 to June 15, 2023. My investigation disclosed that Blackline failed to maintain the requested records.

### **DECLARATION**

I have read the foregoing and know the contents thereof and I declare under penalty of perjury that the foregoing is true and correct, except as to those matters stated on information and belief, and to those matters, I believe to be true.

Executed on January 24, 2024 at Sacramento, California.

*Bee MaiKa Vang*

Bee MaiKa Vang, Enforcement Analyst

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- Attachment 2. Blackline 10 Employee-Driver Sample
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- Attachment 5. Drug Consortium Consultant Response to Data Request
- Attachment 6. Blackline Response to Data Request
- Attachment 7. A Sample Copy of Blackline's Circuit Charge Report



# ATTACHMENT 1

**PUBLIC UTILITIES COMMISSION**

505 Van Ness Avenue  
San Francisco, CA 94102



**VIA ELECTRONIC MAIL ONLY**

November 21, 2023

TCP#: 38150

Uber Technologies, Inc.  
Attn: Jane Lee, Senior Council  
1515 3rd Street  
San Francisco, CA 94158  
Email: [REDACTED]

**Data Request: Data Request [REDACTED] Re: Uber Black platform/allegations of fraudulent passenger-carrier activity taking place on or around the Los Angeles International Airport (LAX)**

**Due Date: December 8, 2023**

Dear Ms. Lee,

The California Public Utilities Commission's (CPUC) Consumer Protection and Enforcement Division (CPED) seeks additional information listed in the attached data request, pursuant to CPUC authority under Public Utilities Code §§ 311, 314, 581, 582, 584 and 5389. Please submit the requested information on or before Friday, **December 8, 2023**, to:

Bezawit Dilgassa  
California Public Utilities Commission  
Consumer Protection and Enforcement Division  
Email: [bezawit.dilgassa@cpuc.ca.gov](mailto:bezawit.dilgassa@cpuc.ca.gov)  
Phone: (415) 792-3269

With a copy to:

Maria Solis  
California Public Utilities Commission  
Consumer Protection and Enforcement Division  
Email: [maria.solis@cpuc.ca.gov](mailto:maria.solis@cpuc.ca.gov)

If for any reason, Uber Technologies, Inc. (Uber) is unable to complete the data response by this date, please provide a written explanation to me as soon as possible, and no later than 5:00 pm on Tuesday, **December 5, 2023**, as to why Uber cannot meet the due date and when the information will be provided.

Thank you for your cooperation.

Sincerely,

*Bezawit Dilgassa*

Bezawit Dilgassa, Senior Enforcement Analyst  
Transportation Enforcement Branch  
CPUC – Consumer Protection and Enforcement Division  
[Bezawit.dilgassa@cpuc.ca.gov](mailto:Bezawit.dilgassa@cpuc.ca.gov)  
Direct Line: (415) 792-3269

cc: Maria Solis, Program & Project Supervisor, [Maria.Solis@cpuc.ca.gov](mailto:Maria.Solis@cpuc.ca.gov)

Attachment

## **DEFINITIONS AND INSTRUCTIONS**

You are instructed to answer the following Data Requests with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. For any questions, email the contact above.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify CPED as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided in the original electronic format, if available, and in an easily accessed digital copy using Word, Excel, PDF, etc. All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning.

If a request, definition, or an instruction, is unclear, notify Consumer Protection and Enforcement Division as soon as possible.

## ATTACHMENT

### **Data Request No. [REDACTED]**

Uber Technologies, Inc. (Uber) responded to the California Public Utilities Commission's (CPUC) Consumer Protection and Enforcement Division (CPED) Data Request No. [REDACTED] [REDACTED] Re: Uber Black platform/allegations of fraudulent passenger-carrier activity taking place on or around the Los Angeles International Airport (LAX) (hereinafter "the Data Request [REDACTED]") sent on July 28, 2023, on August 18, 2023, and August 25, 2023. CPED has the following additional requests.

1. In response to [REDACTED] of the Data Request [REDACTED], Uber provided the charter-party carriers listed below as "...subcarrier referenced in the LAX PD complaint and determined to have submitted fraudulent documents to Uber..." and provided waybill information for each carrier.
  - ERO Transportation Inc. (PSG 0039308)
  - AMR77 Corporation (PSG 0038984)
  - VIP77 Transportation Services Inc. (PSG 0041087)
  - Tikero Group Inc. (PSG 0039467)
  - Picazo Limo LLC (PSG 0040668)

The waybill information Uber provided includes the waybill details for Best Limo Group, Inc. (PSG 0042008). Please state if this carrier is associated with the alleged fraudulent activity.

2. In response to [REDACTED] of the Data Request [REDACTED], Uber provided a list of charter-party carriers "...that Uber believes to have been involved in allegations of fraudulent activity taking place on the Uber Black platform and around the Los Angeles International Airport..." including each carrier's owner information and status on Uber platform.

Please provide copies of corresponding waybills for each of the carriers from the initial date of fraudulent activity to current. Responsive waybills shall include at a minimum, records from January 1, 2022 to current. In lieu of actual waybills, Uber may provide the information in Excel spreadsheet(s) including all waybill information per CPUC General Order 157-E Part 3.01. The following carriers are excluded from this request:

- Best Limo Group, Inc. (PSG 0042008)
- E.D.A Transportation, Inc. (PSG 0038443)
- AMR77 Corporation (PSG 0038984)
- ERO Transportation Inc. (PSG 0039308)
- Picazo Limo LLC (PSG 0040668)
- Tikero Group Inc. (PSG 0039467)
- VIP77 Transportation Services Inc. (PSG 0041087)



3. Please state if Blackline Holdings, Inc. (PSG0043342) and Presidential Express, Inc. (PSG0036557) are/were operating on Uber's platform and if Uber's investigation into the alleged fraudulent activity identified these charter-party carriers' association.
4. Please provide copies of corresponding waybills for Blackline Holdings, Inc. (PSG0043342) and Presidential Express, Inc. (PSG0036557), if the charter-party carriers are/were operating on Uber's platform, from January 1, 2022 to current. In lieu of actual waybills, Uber may provide the information in an Excel spreadsheet(s) including all waybill information per CPUC General Order 157-E Part 3.01

# ATTACHMENT 2

Business Name	Cert. #	Driver Name	Rider First Name	License Plate	Begin Trip	Dropoff Trip	Begin ZIP	Dropoff ZIP
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 0:30	5/18/2023 0:49	90069	91606
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 1:00	5/18/2023 1:22	91601	90069
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 4:24	5/18/2023 4:51	90077	90045
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 5:28	5/18/2023 5:32	90049	90025
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 6:42	5/18/2023 7:13	90049	90045
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 7:05	5/18/2023 7:18	90046	90036
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 7:29	5/18/2023 8:07	90272	90045
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 7:50	5/18/2023 8:57	90069	90045
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 8:15	5/18/2023 8:45	90049	90045
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 8:19	5/18/2023 8:44	90028	91505
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 9:00	5/18/2023 9:54	90029	90045
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 9:12	5/18/2023 9:59	90045	92802
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 9:58	5/18/2023 11:00	90068	90045
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 11:12	5/18/2023 12:19	90045	92672
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 11:24	5/18/2023 11:34	90046	90046
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 12:46	5/18/2023 13:18	90069	90025
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 13:11	5/18/2023 13:31	91505	90038
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 13:16	5/18/2023 13:30	90045	90066
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 13:36	5/18/2023 15:54	90040	90302
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 13:56	5/18/2023 14:52	90069	91303
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 14:25	5/18/2023 15:07	90069	91316
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 16:50	5/18/2023 17:11	90057	90048
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 17:12	5/18/2023 17:23	90068	90028
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	5/18/2023 17:23	5/18/2023 17:43	91352	91606

BLACKLINE HOLDINGS	43342				5/18/2023 17:24	5/18/2023 17:55	90048	90403
BLACKLINE HOLDINGS	43342				5/18/2023 17:29	5/18/2023 17:58	90028	91505
BLACKLINE HOLDINGS	43342				5/18/2023 18:06	5/18/2023 18:22	90067	90069
BLACKLINE HOLDINGS	43342				5/18/2023 18:15	5/18/2023 19:01	90401	90045
BLACKLINE HOLDINGS	43342				5/18/2023 18:49	5/18/2023 18:58	91608	90028
BLACKLINE HOLDINGS	43342				5/18/2023 18:49	5/18/2023 19:36	90067	91367
BLACKLINE HOLDINGS	43342				5/18/2023 19:04	5/18/2023 19:17	91352	91202
BLACKLINE HOLDINGS	43342				5/18/2023 19:05	5/18/2023 19:09	90028	90028
BLACKLINE HOLDINGS	43342				5/18/2023 19:10	5/18/2023 19:46	90045	90505
BLACKLINE HOLDINGS	43342				5/18/2023 19:26	5/18/2023 19:48	91203	90028
BLACKLINE HOLDINGS	43342				5/18/2023 19:31	5/18/2023 19:42	90046	90068
BLACKLINE HOLDINGS	43342				5/18/2023 19:43	5/18/2023 19:50	90028	90028
BLACKLINE HOLDINGS	43342				5/18/2023 20:08	5/18/2023 20:25	90028	90210
BLACKLINE HOLDINGS	43342				5/18/2023 20:15	5/18/2023 20:21	90069	90069
BLACKLINE HOLDINGS	43342				5/18/2023 20:15	5/18/2023 20:19	90068	90028
BLACKLINE HOLDINGS	43342				5/18/2023 20:33	5/18/2023 20:39	90069	90046
BLACKLINE HOLDINGS	43342				5/18/2023 20:34	5/18/2023 20:45	90503	90277
BLACKLINE HOLDINGS	43342				5/18/2023 20:40	5/18/2023 20:55	90028	90046
BLACKLINE HOLDINGS	43342				5/18/2023 20:57	5/18/2023 21:01	90069	90069
BLACKLINE HOLDINGS	43342				5/18/2023 21:05	5/18/2023 21:16	90068	90069
BLACKLINE HOLDINGS	43342				5/18/2023 21:16	5/18/2023 21:18	90069	90069
BLACKLINE HOLDINGS	43342				5/18/2023 21:23	5/18/2023 21:41	90266	90249
BLACKLINE HOLDINGS	43342				5/18/2023 21:33	5/18/2023 21:40	90068	90028
BLACKLINE HOLDINGS	43342				5/18/2023 22:16	5/18/2023 22:38	90028	90057
BLACKLINE HOLDINGS	43342				5/18/2023 22:23	5/18/2023 22:45	90007	91105
BLACKLINE HOLDINGS	43342				5/18/2023 22:27	5/18/2023 22:29	90049	90049

BLACKLINE HOLDINGS	43342				5/18/2023 22:42	5/18/2023 22:45	90049	90025
BLACKLINE HOLDINGS	43342				5/18/2023 22:50	5/18/2023 23:03	90028	90015
BLACKLINE HOLDINGS	43342				5/18/2023 23:08	5/18/2023 23:17	90049	90024
BLACKLINE HOLDINGS	43342				5/18/2023 23:33	5/18/2023 23:42	90028	90038
BLACKLINE HOLDINGS	43342				5/18/2023 23:51	5/18/2023 23:59	90291	90292
BLACKLINE HOLDINGS	43342				5/19/2023 0:09	5/19/2023 0:37	\N	90056
BLACKLINE HOLDINGS	43342				5/19/2023 0:37	5/19/2023 0:50	90291	90404
BLACKLINE HOLDINGS	43342				5/19/2023 1:11	5/19/2023 1:13	90069	90069
BLACKLINE HOLDINGS	43342				5/19/2023 2:09	5/19/2023 2:26	90028	90069
BLACKLINE HOLDINGS	43342				5/19/2023 7:12	5/19/2023 7:27	90272	90404
BLACKLINE HOLDINGS	43342				5/19/2023 7:28	5/19/2023 7:31	90069	90069
BLACKLINE HOLDINGS	43342				5/19/2023 7:51	5/19/2023 8:03	90402	90404
BLACKLINE HOLDINGS	43342				5/19/2023 7:54	5/19/2023 8:30	90069	90404
BLACKLINE HOLDINGS	43342				5/19/2023 8:53	5/19/2023 9:10	91604	91504
BLACKLINE HOLDINGS	43342				5/19/2023 9:07	5/19/2023 9:18	90069	90210
BLACKLINE HOLDINGS	43342				5/19/2023 9:20	5/19/2023 9:43	90068	90039
BLACKLINE HOLDINGS	43342				5/19/2023 9:28	5/19/2023 10:01	90049	90045
BLACKLINE HOLDINGS	43342				5/19/2023 10:03	5/19/2023 10:48	90026	90401
BLACKLINE HOLDINGS	43342				5/19/2023 10:10	5/19/2023 10:38	90045	90064
BLACKLINE HOLDINGS	43342				5/19/2023 10:24	5/19/2023 11:00	90069	91107
BLACKLINE HOLDINGS	43342				5/19/2023 10:30	5/19/2023 11:26	90069	90045
BLACKLINE HOLDINGS	43342				5/19/2023 11:10	5/19/2023 11:25	91106	91011
BLACKLINE HOLDINGS	43342				5/19/2023 11:34	5/19/2023 12:22	91011	90405
BLACKLINE HOLDINGS	43342				5/19/2023 11:41	5/19/2023 12:03	90045	90405
BLACKLINE HOLDINGS	43342				5/19/2023 11:50	5/19/2023 12:08	90017	90035
BLACKLINE HOLDINGS	43342				5/19/2023 12:02	5/19/2023 12:31	90401	90265



BLACKLINE HOLDINGS	43342				5/19/2023 13:22	5/19/2023 13:32	90272	90272
BLACKLINE HOLDINGS	43342				5/19/2023 13:48	5/19/2023 14:42	90069	90045
BLACKLINE HOLDINGS	43342				5/19/2023 13:54	5/19/2023 15:04	90049	90045
BLACKLINE HOLDINGS	43342				5/19/2023 13:57	5/19/2023 14:44	90045	90802
BLACKLINE HOLDINGS	43342				5/19/2023 14:57	5/19/2023 15:52	90045	90028
BLACKLINE HOLDINGS	43342				5/19/2023 15:40	5/19/2023 15:55	90045	90292
BLACKLINE HOLDINGS	43342				5/19/2023 16:12	5/19/2023 17:00	90292	90069
BLACKLINE HOLDINGS	43342				5/19/2023 16:24	5/19/2023 17:59	90275	91423
BLACKLINE HOLDINGS	43342				5/19/2023 17:28	5/19/2023 17:59	91042	91205
BLACKLINE HOLDINGS	43342				5/19/2023 17:45	5/19/2023 17:51	90028	90046
BLACKLINE HOLDINGS	43342				5/19/2023 17:57	5/19/2023 18:06	90069	90211
BLACKLINE HOLDINGS	43342				5/19/2023 17:59	5/19/2023 18:48	90048	90045
BLACKLINE HOLDINGS	43342				5/19/2023 18:06	5/19/2023 18:48	91204	90405
BLACKLINE HOLDINGS	43342				5/19/2023 18:59	5/19/2023 19:20	90045	90404
BLACKLINE HOLDINGS	43342				5/19/2023 19:00	5/19/2023 19:04	91423	91423
BLACKLINE HOLDINGS	43342				5/19/2023 19:08	5/19/2023 19:14	90013	90012
BLACKLINE HOLDINGS	43342				5/19/2023 19:11	5/19/2023 19:39	90405	90305
BLACKLINE HOLDINGS	43342				5/19/2023 19:12	5/19/2023 19:23	90036	90069
BLACKLINE HOLDINGS	43342				5/19/2023 19:18	5/19/2023 19:39	91423	90068
BLACKLINE HOLDINGS	43342				5/19/2023 19:18	5/19/2023 19:45	90071	90028
BLACKLINE HOLDINGS	43342				5/19/2023 19:48	5/19/2023 20:08	90028	90020
BLACKLINE HOLDINGS	43342				5/19/2023 20:01	5/19/2023 20:12	90068	90027
BLACKLINE HOLDINGS	43342				5/19/2023 20:02	5/19/2023 20:12	90069	90069
BLACKLINE HOLDINGS	43342				5/19/2023 20:11	5/19/2023 20:29	90048	90046
BLACKLINE HOLDINGS	43342				5/19/2023 20:19	5/19/2023 20:52	90057	90045
BLACKLINE HOLDINGS	43342				5/19/2023 20:21	5/19/2023 20:38	90028	90069

BLACKLINE HOLDINGS	43342				5/19/2023 20:23	5/19/2023 20:26	90291	90291
BLACKLINE HOLDINGS	43342				5/19/2023 20:53	5/19/2023 21:18	90210	90005
BLACKLINE HOLDINGS	43342				5/19/2023 20:56	5/19/2023 21:26	90272	91604
BLACKLINE HOLDINGS	43342				5/19/2023 21:15	5/19/2023 21:55	90045	91367
BLACKLINE HOLDINGS	43342				5/19/2023 21:29	5/19/2023 21:47	90005	90069
BLACKLINE HOLDINGS	43342				5/19/2023 21:31	5/19/2023 21:44	91604	90069
BLACKLINE HOLDINGS	43342				5/19/2023 21:56	5/19/2023 22:14	90068	90069
BLACKLINE HOLDINGS	43342				5/19/2023 22:20	5/19/2023 22:34	90069	90212
BLACKLINE HOLDINGS	43342				5/19/2023 22:24	5/19/2023 22:35	90049	90401
BLACKLINE HOLDINGS	43342				5/19/2023 22:33	5/19/2023 22:40	90049	90403
BLACKLINE HOLDINGS	43342				5/19/2023 22:41	5/19/2023 22:47	90212	90067
BLACKLINE HOLDINGS	43342				5/19/2023 22:44	5/19/2023 23:03	90005	90028
BLACKLINE HOLDINGS	43342				5/19/2023 22:58	5/19/2023 23:00	90049	90049
BLACKLINE HOLDINGS	43342				5/19/2023 23:00	5/19/2023 23:08	90049	90402
BLACKLINE HOLDINGS	43342				5/19/2023 23:21	5/19/2023 23:44	90028	90035
BLACKLINE HOLDINGS	43342				5/19/2023 23:22	5/19/2023 23:27	90405	90291
BLACKLINE HOLDINGS	43342				5/19/2023 23:23	5/19/2023 23:42	90049	90069
BLACKLINE HOLDINGS	43342				5/19/2023 23:28	5/19/2023 23:52	90049	90048
BLACKLINE HOLDINGS	43342				5/19/2023 23:34	5/19/2023 23:50	90291	90024
BLACKLINE HOLDINGS	43342				5/20/2023 0:06	5/20/2023 0:12	90069	90046
BLACKLINE HOLDINGS	43342				5/20/2023 0:21	5/20/2023 0:36	90068	90048
BLACKLINE HOLDINGS	43342				5/20/2023 0:25	5/20/2023 0:41	90210	90210
BLACKLINE HOLDINGS	43342				5/20/2023 0:28	5/20/2023 0:39	90069	90046
BLACKLINE HOLDINGS	43342				5/20/2023 0:44	5/20/2023 0:49	90046	90069
BLACKLINE HOLDINGS	43342				5/20/2023 0:54	5/20/2023 0:56	90069	90046
BLACKLINE HOLDINGS	43342				5/20/2023 0:59	5/20/2023 1:06	90210	90048

BLACKLINE HOLDINGS	43342				5/20/2023 1:02	5/20/2023 1:11	90069	90048
BLACKLINE HOLDINGS	43342				5/20/2023 1:08	5/20/2023 1:15	90048	90069
BLACKLINE HOLDINGS	43342				5/20/2023 1:25	5/20/2023 1:31	90046	90028
BLACKLINE HOLDINGS	43342				5/20/2023 1:30	5/20/2023 1:38	90069	90069
BLACKLINE HOLDINGS	43342				5/20/2023 2:09	5/20/2023 2:15	90028	90028
BLACKLINE HOLDINGS	43342				5/20/2023 2:11	5/20/2023 2:45	90028	90272
BLACKLINE HOLDINGS	43342				5/20/2023 2:12	5/20/2023 2:17	90069	90048
BLACKLINE HOLDINGS	43342				5/20/2023 2:20	5/20/2023 2:38	90028	90017
BLACKLINE HOLDINGS	43342				5/20/2023 2:24	5/20/2023 2:36	90048	90028
BLACKLINE HOLDINGS	43342				5/20/2023 2:59	5/20/2023 3:06	90064	90016
BLACKLINE HOLDINGS	43342				5/20/2023 3:25	5/20/2023 3:42	90026	90048
BLACKLINE HOLDINGS	43342				5/20/2023 3:39	5/20/2023 3:43	90028	90028
BLACKLINE HOLDINGS	43342				5/20/2023 3:57	5/20/2023 4:14	90068	90210
BLACKLINE HOLDINGS	43342				5/20/2023 4:28	5/20/2023 4:38	90069	90004
BLACKLINE HOLDINGS	43342				5/20/2023 7:44	5/20/2023 7:51	90069	90046
BLACKLINE HOLDINGS	43342				5/20/2023 8:37	5/20/2023 8:58	90069	90038
BLACKLINE HOLDINGS	43342				5/20/2023 9:19	5/20/2023 9:29	90069	90028
BLACKLINE HOLDINGS	43342				5/20/2023 10:01	5/20/2023 10:08	90069	90048
BLACKLINE HOLDINGS	43342				5/20/2023 10:06	5/20/2023 10:43	91302	91608
BLACKLINE HOLDINGS	43342				5/20/2023 10:15	5/20/2023 10:31	90069	90077
BLACKLINE HOLDINGS	43342				5/20/2023 10:38	5/20/2023 11:08	90026	90048
BLACKLINE HOLDINGS	43342				5/20/2023 11:16	5/20/2023 11:48	90069	90401
BLACKLINE HOLDINGS	43342				5/20/2023 12:05	5/20/2023 12:24	90211	90038
BLACKLINE HOLDINGS	43342				5/20/2023 12:44	5/20/2023 13:10	90069	90020
BLACKLINE HOLDINGS	43342				5/20/2023 13:09	5/20/2023 13:18	90211	90210
BLACKLINE HOLDINGS	43342				5/20/2023 13:39	5/20/2023 13:45	90046	90069

BLACKLINE HOLDINGS	43342				5/20/2023 14:05	5/20/2023 14:43	90048	90292
BLACKLINE HOLDINGS	43342				5/20/2023 14:06	5/20/2023 14:54	90069	90045
BLACKLINE HOLDINGS	43342				5/20/2023 14:25	5/20/2023 14:56	91604	91343
BLACKLINE HOLDINGS	43342				5/20/2023 15:01	5/20/2023 15:37	90045	90402
BLACKLINE HOLDINGS	43342				5/20/2023 15:43	5/20/2023 16:25	90026	90401
BLACKLINE HOLDINGS	43342				5/20/2023 16:42	5/20/2023 17:04	91423	90025
BLACKLINE HOLDINGS	43342				5/20/2023 16:53	5/20/2023 17:10	90401	90291
BLACKLINE HOLDINGS	43342				5/20/2023 16:55	5/20/2023 17:10	90069	90212
BLACKLINE HOLDINGS	43342				5/20/2023 17:05	5/20/2023 17:49	91605	90015
BLACKLINE HOLDINGS	43342				5/20/2023 17:09	5/20/2023 17:46	90025	90028
BLACKLINE HOLDINGS	43342				5/20/2023 17:17	5/20/2023 17:59	90291	90069
BLACKLINE HOLDINGS	43342				5/20/2023 17:27	5/20/2023 17:51	90210	90291
BLACKLINE HOLDINGS	43342				5/20/2023 17:48	5/20/2023 17:57	90401	90402
BLACKLINE HOLDINGS	43342				5/20/2023 17:59	5/20/2023 18:06	90069	90069
BLACKLINE HOLDINGS	43342				5/20/2023 18:00	5/20/2023 18:13	90291	90025
BLACKLINE HOLDINGS	43342				5/20/2023 18:06	5/20/2023 18:38	90403	90048
BLACKLINE HOLDINGS	43342				5/20/2023 18:14	5/20/2023 19:25	90069	90305
BLACKLINE HOLDINGS	43342				5/20/2023 18:16	5/20/2023 18:26	90004	90010
BLACKLINE HOLDINGS	43342				5/20/2023 18:23	5/20/2023 18:36	90025	90048
BLACKLINE HOLDINGS	43342				5/20/2023 18:23	5/20/2023 18:34	90048	90069
BLACKLINE HOLDINGS	43342				5/20/2023 18:47	5/20/2023 19:27	90210	90045
BLACKLINE HOLDINGS	43342				5/20/2023 18:50	5/20/2023 19:18	90069	90401
BLACKLINE HOLDINGS	43342				5/20/2023 19:04	5/20/2023 19:14	90048	90210
BLACKLINE HOLDINGS	43342				5/20/2023 19:08	5/20/2023 19:25	90068	90048
BLACKLINE HOLDINGS	43342				5/20/2023 19:16	5/20/2023 19:21	90212	90210
BLACKLINE HOLDINGS	43342				5/20/2023 19:28	5/20/2023 19:55	90403	90305

BLACKLINE HOLDINGS	43342				5/20/2023 19:47	5/20/2023 19:58	90068	90046
BLACKLINE HOLDINGS	43342				5/20/2023 19:49	5/20/2023 20:28	90045	92646
BLACKLINE HOLDINGS	43342				5/20/2023 19:53	5/20/2023 19:58	90035	90211
BLACKLINE HOLDINGS	43342				5/20/2023 20:43	5/20/2023 20:56	90028	90069
BLACKLINE HOLDINGS	43342				5/20/2023 20:58	5/20/2023 21:15	90211	90401
BLACKLINE HOLDINGS	43342				5/20/2023 21:13	5/20/2023 21:24	90069	90210
BLACKLINE HOLDINGS	43342				5/20/2023 21:17	5/20/2023 21:33	90402	90405
BLACKLINE HOLDINGS	43342				5/20/2023 21:35	5/20/2023 21:47	90068	90046
BLACKLINE HOLDINGS	43342				5/20/2023 21:42	5/20/2023 21:52	90069	90048
BLACKLINE HOLDINGS	43342				5/20/2023 21:54	5/20/2023 22:08	90046	90069
BLACKLINE HOLDINGS	43342				5/20/2023 22:04	5/20/2023 22:35	90048	90049
BLACKLINE HOLDINGS	43342				5/20/2023 22:14	5/20/2023 22:19	90069	90069
BLACKLINE HOLDINGS	43342				5/20/2023 22:18	5/20/2023 22:34	90045	90292
BLACKLINE HOLDINGS	43342				5/20/2023 22:32	5/20/2023 23:00	90015	90046
BLACKLINE HOLDINGS	43342				5/20/2023 22:39	5/20/2023 22:40	90046	90046
BLACKLINE HOLDINGS	43342				5/20/2023 22:45	5/20/2023 22:55	90293	90045
BLACKLINE HOLDINGS	43342				5/20/2023 22:54	5/20/2023 23:09	90404	90291
BLACKLINE HOLDINGS	43342				5/20/2023 22:56	5/20/2023 23:20	90049	90013
BLACKLINE HOLDINGS	43342				5/20/2023 23:01	5/20/2023 23:14	90028	90069
BLACKLINE HOLDINGS	43342				5/20/2023 23:04	5/20/2023 23:23	90045	90402
BLACKLINE HOLDINGS	43342				5/20/2023 23:04	5/20/2023 23:16	90046	90036
BLACKLINE HOLDINGS	43342				5/20/2023 23:13	5/20/2023 23:40	90291	90036
BLACKLINE HOLDINGS	43342				5/20/2023 23:18	5/20/2023 23:24	90069	90069
BLACKLINE HOLDINGS	43342				5/20/2023 23:41	5/20/2023 23:49	90017	90012
BLACKLINE HOLDINGS	43342				5/20/2023 23:47	5/21/2023 0:02	90065	90042
BLACKLINE HOLDINGS	43342				5/20/2023 23:57	5/20/2023 23:59	90046	90046



BLACKLINE HOLDINGS	43342				6/15/2023 2:23	6/15/2023 2:37	90028	90069
BLACKLINE HOLDINGS	43342				6/15/2023 5:49	6/15/2023 6:08	90068	91505
BLACKLINE HOLDINGS	43342				6/15/2023 6:30	6/15/2023 7:31	91506	90045
BLACKLINE HOLDINGS	43342				6/15/2023 7:05	6/15/2023 7:47	90028	90045
BLACKLINE HOLDINGS	43342				6/15/2023 8:03	6/15/2023 8:26	90045	90230
BLACKLINE HOLDINGS	43342				6/15/2023 8:07	6/15/2023 8:39	90292	90067
BLACKLINE HOLDINGS	43342				6/15/2023 8:43	6/15/2023 8:49	90232	90232
BLACKLINE HOLDINGS	43342				6/15/2023 9:12	6/15/2023 10:04	90069	90045
BLACKLINE HOLDINGS	43342				6/15/2023 10:25	6/15/2023 10:58	90045	91030
BLACKLINE HOLDINGS	43342				6/15/2023 12:49	6/15/2023 13:54	91423	90045
BLACKLINE HOLDINGS	43342				6/15/2023 13:07	6/15/2023 14:33	90069	90045
BLACKLINE HOLDINGS	43342				6/15/2023 14:02	6/15/2023 14:42	90045	90802
BLACKLINE HOLDINGS	43342				6/15/2023 14:05	6/15/2023 14:27	90012	90028
BLACKLINE HOLDINGS	43342				6/15/2023 14:32	6/15/2023 15:02	90028	90232
BLACKLINE HOLDINGS	43342				6/15/2023 14:55	6/15/2023 16:01	90045	90027
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BLACKLINE HOLDINGS	43342				6/15/2023 17:37	6/15/2023 18:10	90045	90024
BLACKLINE HOLDINGS	43342				6/15/2023 18:16	6/15/2023 18:31	90024	90049
BLACKLINE HOLDINGS	43342				6/15/2023 18:37	6/15/2023 18:50	90049	90049
BLACKLINE HOLDINGS	43342				6/15/2023 19:47	6/15/2023 19:53	91316	91316
BLACKLINE HOLDINGS	43342				6/15/2023 20:06	6/15/2023 20:29	91436	90028
BLACKLINE HOLDINGS	43342				6/15/2023 20:29	6/15/2023 20:50	90028	90210
BLACKLINE HOLDINGS	43342				6/15/2023 20:30	6/15/2023 20:44	90028	90069
BLACKLINE HOLDINGS	43342				6/15/2023 20:51	6/15/2023 21:06	90024	90069

BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	6/15/2023 21:22	6/15/2023 21:39	90069	90077
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	6/15/2023 21:45	6/15/2023 22:07	90210	90405
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	6/15/2023 21:53	6/15/2023 22:08	90077	90230
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	6/15/2023 22:25	6/15/2023 22:32	90064	90049
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	6/15/2023 22:27	6/15/2023 22:38	90405	90403
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	6/15/2023 22:40	6/15/2023 22:55	90049	90212
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	6/15/2023 22:54	6/15/2023 23:10	90027	90046
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	6/15/2023 23:09	6/15/2023 23:27	90024	91602
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	6/15/2023 23:30	6/15/2023 23:42	90291	90064
BLACKLINE HOLDINGS	43342	[REDACTED]	[REDACTED]	[REDACTED]	6/15/2023 23:44	6/15/2023 23:51	90069	90210

# ATTACHMENT 3

# BLACKLINE HOLDINGS INC

REQUESTER CODE: [REDACTED]

DBA NAME:

CONTACT PERSON: Arthur Arakelyan

ADDRESS: [REDACTED]

PHONE NUMBER: [REDACTED]

RC STATUS: A [REDACTED]

EMAIL: [REDACTED]

CLASS/DESC: G / 0

EFFECTIVE: 02/13/2023

EXPIRES: 01/01/2040

REASON CLOSED:

CUTOFF:

RESTORE:

TOTAL DRIVERS: 1

## Driver List

Driver Name	DL Number	Requester Code	Add Date	Delete Date	Status
ARAKELYAN ARTHUR ARAYIKOV	[REDACTED]	[REDACTED]	02/13/2023		Enrolled

# ATTACHMENT 4

**PUBLIC UTILITIES COMMISSION**

300 Capitol Mall, Suite 500  
SACRAMENTO, CA 95814



August 22, 2023

TCP: 43342 B Suspended  
Case No.: PSG-5939

Blackline Holdings Inc.  
ATTN: Artak Aghajanyan

Subject: Data Request

Dear Blackline Holdings Inc:

The California Public Utilities Commission's (Commission) Consumer Protection and Enforcement Division (CPED) Transportation Enforcement Branch (TEB) is currently reviewing the Commission's records for intrastate transportation carriers that are regulated by the Commission.

Public Utilities Code Section 5389 authorizes the Commission and its staff to have access at any time to the land, buildings, or equipment of a charter-party carrier of passengers used in connection with the operation of its business and may inspect the accounts, books, papers, and documents of the carrier.

General Order 157-E, Part 6.01 specifically states in part that every carrier shall institute and maintain in its offices a set of records which reflect information as to the transportation services performed, including waybills, driver records, and safety and maintenance records including copies of all lease and sub-carrier agreements. Such records shall be maintained for a minimum period of three years.

Pursuant to Public Utilities Code Section 5389, the Commission is requesting a review of the Charter-Party intrastate transportation records for Blackline Holdings Inc. Failure to provide access to records is a misdemeanor punishable by a maximum of \$5,000, or by imprisonment in a county jail not exceeding one year, or by both fine and imprisonment, where each violation is a separate and distinct offense (Public Utilities Code Section 2110).

We are requesting that you present your documents listed below in electronic form. Please scan the following documents and email a copy to Bee MaiKa Vang at [bee.vang@cpuc.ca.gov](mailto:bee.vang@cpuc.ca.gov) by 5:00 p.m. on Tuesday, September 5, 2023.

1. Your current Public Liability and Property Damage (PL&PD) insurance policy showing schedule of vehicles and drivers insured,
2. Your current Workers' Compensation (WKCP) insurance policy,
3. List of all current sub-carriers and agreements,
4. Current service agreement with your Drug Consortium and a list of all drivers enrolled showing dates added and/or deleted,
5. Vehicle accident records including insurance loss runs showing dates of accidents and drivers' names for the last five (5) years,
6. Last three (3) years of filed Federal and State Income Tax Returns,
7. Other Fictitious Business Names (FBN) doing business as (dba),
8. All pre-employment and random drug test results for all your drivers within the last six (6) months, and

CPED reserves the right to amend, add to or revise this Data Request in the future if necessary.

Any responsive records provided by you that have been properly labeled and submitted as confidential will be treated as such, under Public Utilities Code Section 583 (see also General Order 66-D). Confidential documents will not be released to the public except as required by law following a Public Records Request and redaction of confidential material.

Please contact me within five days of receiving this notice by email at [bee.vang@cpuc.ca.gov](mailto:bee.vang@cpuc.ca.gov).

Sincerely,

*Bee MaiKa Vang*

Bee MaiKa Vang, Enforcement Analyst  
California Public Utilities Commission  
Consumer Protection and Enforcement Division  
Transportation Enforcement Branch  
Email: [bee-vang@cpuc.ca.gov](mailto:bee-vang@cpuc.ca.gov)  
Telephone: (916) 584 – 0448

cc: Eric Hooks, Enforcement Supervisor

# **ATTACHMENT 5**



## Vang, Bee "Maika"

---

**From:** Vang, Bee "Maika"  
**Sent:** Friday, September 8, 2023 1:06 PM  
**To:** [REDACTED]  
**Cc:** Hooks, Eric; Taylor, Shantanro  
**Subject:** RE: [EXTERNAL] TCP 43342 Blackline Holdings INC

Hello Mr. Delgado,

Thank you for responding. Please have Blackline Holdings Inc. submit in writing that you are its representative and in what capacity?

Blackline Holdings Inc. is responsible for complying with and submitting the items in the data request. I have extended the final due date to September 15, 2023, allowing the passenger carrier to reply with their documentation. Failure to comply will result in a citation for failure to produce records.

I look forward to receiving the documentation from Blackline Holdings Inc.

Sincerely,



**Bee "MaiKa" Vang, Public Utilities Regulatory Analyst**  
**Transportation Enforcement Branch**  
**Consumer Protection and Enforcement Division**  
**California Public Utilities Commission**  
☎ (916) 584-0448  
✉ [bee.vang@cpuc.ca.gov](mailto:bee.vang@cpuc.ca.gov)  
🌐 [www.cpuc.ca.gov](http://www.cpuc.ca.gov)

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**From:** [REDACTED]  
**Sent:** Tuesday, September 5, 2023 11:08 AM  
**To:** Vang, Bee "Maika" <Bee.Vang@cpuc.ca.gov>  
**Cc:** [REDACTED]  
**Subject:** [EXTERNAL] TCP 43342 Blackline Holdings INC

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Bee

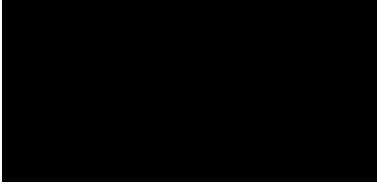
I am writing on behalf of Artak Aghajanyan, Blackline Holdings INC. He has stated that he will no longer be operating his TCP of Corporation and will be filing Chapter 7.

He ha cancelled his Insurance, there is no Workers Comp involved, no Subcarrier agreements, I've attached his 706J, there is no loss/run, (his company has only operated from 2/23/2023 and currently dissolved, There are no income taxes filed since his company was opened on 02/23/2023., There is no FBN. Drug test for the one Driver was submitted to the CPUC on 02/23/2023.

Respectfully on behalf of Artak Aghajanyan

--

Chris Delgado  
CM & Associates, Inc.  
Occupational Health & Safety



Connect with or review us online:

[yelp.com/biz/cm-and-associates-los-angeles](https://www.yelp.com/biz/cm-and-associates-los-angeles)

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**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**  
**CALIFORNIA PUBLIC UTILITIES CODE**  
**CONTROLLED SUBSTANCES AND ALCOHOL TESTING CERTIFICATION PROGRAM**

**I. GENERAL PROGRAM REQUIREMENTS**

All passenger stage and charter-party applicants who propose to employ drivers who will operate vehicles having a seating capacity of 15 persons or less, including the driver, must comply with the Commission's controlled substance and alcohol testing certification program requirements detailed below. Charter-party applicants who propose to employ drivers who will operate vehicles with a seating capacity of 16 persons or more, including the driver, must comply with the federal drug testing requirements for those drivers. If all of your drivers will operate vehicles with a seating capacity of 16 persons or more, you do not have to comply with the state drug testing program or complete part II below. If this is the case, sign and date on the line directly below and complete parts III and IV.

**(A person who employs himself/herself as a driver is considered an employer for the purposes of these requirements.)**

Date

Signature

Public Utilities Code Section 5374 provides that:

The commission shall not issue or renew a charter-party carrier permit or certificate unless the applicant provides for a mandatory controlled substance and alcohol testing certification program as adopted by the commission pursuant to Section 1032.1.

Public Utilities Code Section 1032.1 states that:

1032.1 (a) The commission shall not issue a certificate of public convenience and necessity pursuant to this article unless the applicant provides for a mandatory controlled substance and alcohol testing certification program as adopted by the commission.

(b) The commission, after considering any suggestions made by the Department of the California Highway Patrol, shall adopt a program that includes, but need not be limited to, all of the following requirements:

(1) Drivers shall test negative for each of the controlled substances specified in Part 40 (commencing with Section 40.1) of Title 49 of the Code of Federal Regulations, before employment. Drivers shall test negative for these controlled substances and for alcohol at such other times as the commission, after consulting the Department of the California Highway Patrol, shall designate. As used in this section, a negative test for alcohol means an alcohol screening test showing a breath alcohol concentration of less than 0.02 percent.

(2) Procedures shall be substantially as in Part 40 (commencing with Section 40.1) of Title 49 of the Code of Federal Regulations, except that the driver shall show a valid California driver's license at the time and place of testing, and except as provided otherwise in this section. Requirements for rehabilitation and for return-to-duty and follow-up testing, and other requirements except as provided otherwise in this section, shall be substantially as in Part 382 (commencing with Section 382.101) of Title 49 of the Code of Federal Regulations.

(3) A test for one applicant shall be accepted as meeting the same requirement for any other applicant. Any negative test result shall be accepted for one year as meeting any requirement for periodic testing for that applicant or any other applicant, if the driver has not tested positive subsequent to a negative result. However, an earlier negative result shall not be accepted as meeting the pre-employment testing requirement for any subsequent employment, or any testing requirements under the program other than periodic testing.

(4) In the case of an applicant who is also a driver, test results shall be reported directly to the commission. In all other cases, results shall be reported directly to the applicant.

(5) All test results are confidential and shall not be released without the consent of the driver, except as authorized or required by law.

(6) Applicants shall be responsible for compliance with, and shall pay all costs of, this program with respect to their employees and potential employees, except that an applicant may require employees who test positive to pay the costs of rehabilitation and of return-to-duty and follow-up testing.

(7) The requirements of the program do not apply to any driver required to comply with the controlled substance and alcohol use and testing requirements of Part 382 (commencing with Section 382.101) of Title 49 of the Code of Federal Regulations, or Section 34520 of the Vehicle Code, or to any driver exempted from the provisions of that section.

(c) No evidence derived from a positive test result pursuant to the program shall be admissible in a criminal prosecution concerning unlawful possession, sale or distribution of controlled substances.

(d) On the request of an applicant, the commission shall give the applicant a list of consortia certified pursuant to Part 382 (commencing with Section 382.101) of Title 49 of the Code of Federal Regulations that the commission knows offer tests in California.

(e) The commission shall conduct random and for-cause inspections of applicants' documents supporting compliance with the program.

(f) For purposes of this section, "employment" includes self-employment as an independent driver.

Title 49 of the Code of Federal Regulations (CFR) Part 382: Controlled Substance and Alcohol Use and Testing

To fully understand what is required of you under the CFR, you must obtain a copy of Parts 40 and 382 and become familiar with their directives or obtain one of the controlled substance and alcohol testing program training kits now available on the market.

The following is a brief summary of Part 382.

The CFR requires employers to provide educational materials to their drivers which explain the requirements of Part 382 and the employer's policies and procedures with respect to meeting these requirements (382.601). Further, Part 49 requires employers to provide for a comprehensive drug testing program to ensure that drivers do not operate vehicles while being impaired by alcohol or controlled substances.

Every carrier must conduct pre-employment testing (382.301), post-accident testing (382.303), random testing (382.305) testing due to reasonable suspicion (382.307), follow-up testing (382.311), and return-to-duty testing (382.309).

Employers must advise employees of the resources available to them to resolve problems associated with the misuse of alcohol and the use of controlled substances (382.605).

Employers must ensure that supervisors are properly trained to determine whether reasonable suspicion exists to require a driver to undergo testing (382.603).

Employers shall not permit an employee who has violated the provisions of Part 382 to perform safety-sensitive functions including driving a commercial vehicle.

Title 49 of the CFR Part 40: Procedures for Transportation Workplace Drug Testing Programs

Part 40 provides for the specific procedures for conducting alcohol and controlled substance tests.

II. CONTROLLED SUBSTANCE AND ALCOHOL TESTING CERTIFICATION PROGRAM

**A. Education (Self-employed independent operator is also required to make this showing)**

Unless you have a contract for services from a company which has been prescreened by the Commission staff you must specify the materials you will use to explain to your employees your policies and procedures as an employer with respect to meeting the drug testing requirements of the CFR and PU Code Section 5374. Attach copies of any written material you will use. If you have a contract with a consultant who is setting up a program for you, write the consultant's name and telephone number in the space below and provide a copy of the contract or agreement you have with this consultant to show that you have purchased his services.

CM & ASSOCIATES, INC

**B. Supervisor Training**

All persons designated to supervise drivers must receive at least 60 minutes of training on alcohol misuse and receive at least an additional 60 minutes of training on controlled substances use. The training will be used by supervisors to determine whether reasonable suspicion exists to require a driver to undergo testing. You must show proof that your driver supervisor has completed this training or has enrolled in a training program.

C. Provide the name and telephone number of the facility that will manage or perform your alcohol and controlled substance tests. If you have set up your own program, give us the name of the federally certified laboratory that will be performing your drug tests. If you have a contract with a consultant/company who will manage your ongoing drug testing, give us the name and telephone number of the consultant/company performing this service for you as well as a copy of the contract or agreement.

CM & ASSOCIATES, INC

Name

Telephone Number

D. If there is to be only one driver under the permit, you must enroll that driver in a random testing pool that is managed by an independent company/consultant and provide a copy of the contract or agreement for the random testing service. If you have a contract with a consultant/company who will be managing your testing program list the consultant's/company's name and telephone number below.

CM & ASSOCIATES, INC

Name

Telephone Number

E. A driver/applicant is any applicant (individual, partner, or officer of a corporation) who is applying for charter-party carrier operating authority who will also drive one of the vehicles to be operated under the charter-party authority.

Are you, or any of the applicants, a driver-applicant?

Yes  No

If yes, the driver/applicant is required to cause a copy of its controlled substance and alcohol tests results to be sent directly to the Commission. This application will not be granted until a copy of the alcohol and controlled substance tests have been received, reviewed and found to be in compliance with Chapter 405.

III. ORGANIZATIONAL REQUIREMENTS

Name and telephone number of person(s) in your business responsible for controlled substance and alcohol testing certification program who will be managing your random drug testing program:

Arthur Arakelyan

Name

Telephone Number

IV. CERTIFICATION

I (we) certify that I (we) have read and understand the requirements in Sections I. through III. above and that I am (we are) able to and will comply with each of them; and that the information I (we) have provide on this form, and in any attachments, is true and correct to the best of my (our) knowledge and belief. I (we) certify (or declare), under penalty of perjury, that the foregoing is true and correct

Date: 2/23/23

Arthur Arakelyan

Signature of Applicant(s)

If applicant is a corporation:

Signature of Corporate Officer

Signature of Corporate Officer

Title of Corporate Officer

CEO/owner

opened on 2/27/23

# **ATTACHMENT 6**

## Vang, Bee "Maika"

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**From:** Blackline Holdings Inc [REDACTED]  
**Sent:** Tuesday, October 3, 2023 3:38 PM  
**To:** Vang, Bee "Maika"  
**Cc:** Hooks, Eric; Taylor, Shantanro  
**Subject:** Re: [EXTERNAL] Blackline Holdings inc TCP-43342-B

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi dear Van Bee,

As I mentioned you last time, I don't have any other documentation besides what I sent you. The business has run only for four months and that's what I have . I am sorry but I don't have anything else.

With Best Regards,  
Blackline Holdings

On Monday, October 2, 2023, 4:56 PM, Vang, Bee "Maika <Bee.Vang@cpuc.ca.gov> wrote:

Hello Blackline Holdings Inc.,

Do you have any documentations on how you record your trips? I have attached a link to the General Order 157-E below for your reference. In General Order 157-E, Part 6.01 – regarding records to be maintained for a minimum period of three years. In the General Order 157-E, Part 3.01 – regarding what the waybill shall include. Do you have any documentations at all that have all nine items listed in the waybill during your trips? All trips are on prearranged basis and any records of it may be sufficient.

**General Order 157-E:** [322150628.pdf \(ca.gov\)](#)

*Sincerely,*





**Bee "MaiKa" Vang, Public Utilities Regulatory Analyst**

**Transportation Enforcement Branch**

**Consumer Protection and Enforcement Division**

**California Public Utilities Commission**

**☎ (916) 584-0448**

**✉ [bee.vang@cpuc.ca.gov](mailto:bee.vang@cpuc.ca.gov)**

**🌐 [www.cpuc.ca.gov](http://www.cpuc.ca.gov)**

---

**From:** Blackline Holdings Inc [REDACTED]  
**Sent:** Monday, October 2, 2023 4:28 PM  
**To:** Vang, Bee "Maika" <[Bee.Vang@cpuc.ca.gov](mailto:Bee.Vang@cpuc.ca.gov)>  
**Cc:** Hooks, Eric <[Eric.Hooks@cpuc.ca.gov](mailto:Eric.Hooks@cpuc.ca.gov)>; Taylor, Shantanro <[shantanro.taylor@cpuc.ca.gov](mailto:shantanro.taylor@cpuc.ca.gov)>  
**Subject:** Re: [EXTERNAL] Blackline Holdings inc TCP-43342-B

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Dear Bee Vang,

Thank you for reaching out. Unfortunately, I don't have any other waybills besides LAX, whatever I have I have sent you. I hope it will fulfill the requirements.

In advance thank you for your understanding and cooperation,

With Best Regards,

Blackline Holdings Inc.

On Monday, October 2, 2023, 3:57 PM, Vang, Bee "Maika" <[Bee.Vang@cpuc.ca.gov](mailto:Bee.Vang@cpuc.ca.gov)> wrote:



Good afternoon Blackline Holdings Inc.,

I called you again today, October 2, 2023, at 3:41 p.m. and had to leave a voicemail regarding the attachments in your previous email. After thoroughly reviewing the documents, I have determined that they were not acceptable for they are circuit charges from LAX and not the waybills that I had requested for in my previously email. I will give you until 5:00 p.m. tomorrow, October 3<sup>rd</sup>, 2023, to get the waybills over to me. In the voicemail, I had reminded you about the dates of the waybills that I had requested for. I also included in my voicemail that I will need all the waybills from every vehicle that operated under Blackline Holdings Inc. from April 1, 2023, through July 1, 2023. I look forward to you sending the waybills.

*Sincerely,*



**Bee "MaiKa" Vang, Public Utilities Regulatory Analyst**  
**Transportation Enforcement Branch**  
**Consumer Protection and Enforcement Division**  
**California Public Utilities Commission**  
☎ (916) 584-0448  
✉ [bee.vang@cpuc.ca.gov](mailto:bee.vang@cpuc.ca.gov)  
🌐 [www.cpuc.ca.gov](http://www.cpuc.ca.gov)

---

**From:** Blackline Holdings Inc [REDACTED]  
**Sent:** Wednesday, September 20, 2023 4:12 PM  
**To:** Vang, Bee "Maika" <[Bee.Vang@cpuc.ca.gov](mailto:Bee.Vang@cpuc.ca.gov)>  
**Subject:** Re: [EXTERNAL] Blackline Holdings inc TCP-43342-B

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon dear Bee Vang,  
I am attaching to this email the documents for requested months.

With Best Regards,  
Blackline Holdings inc.

On Wednesday, September 20, 2023 at 03:51:03 PM PDT, Vang, Bee "Maika" <[bee.vang@cpuc.ca.gov](mailto:bee.vang@cpuc.ca.gov)> wrote:

Hello Blackline Holdings Inc.,

Thank you for responding to my requests. I have received your attachments. I called you again today, September 20, 2023 at 3:31 p.m. and had to leave a voicemail regarding my additional request for your waybills. Please send Blackline Holdings Inc.'s waybills from April 1, 2023 through July 1, 2023 or through the last date of operation via email by 5:00 p.m. on Friday, September

22, 2023. If you would prefer to mail out copies of the waybills, please inform me and send it to the CPUC Sacramento Office: 400 R Street, Suite 250 Sacramento, CA 95811 with the ATTN to Bee (MaiKa) Vang. I look forward to you sending the waybills.

*Sincerely,*



**Bee "MaiKa" Vang, Public Utilities Regulatory Analyst**  
**Transportation Enforcement Branch**  
**Consumer Protection and Enforcement Division**  
**California Public Utilities Commission**

☎ (916) 584-0448

✉ [bee.vang@cpuc.ca.gov](mailto:bee.vang@cpuc.ca.gov)

🌐 [www.cpuc.ca.gov](http://www.cpuc.ca.gov)

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**From:** Blackline Holdings Inc [REDACTED]  
**Sent:** Tuesday, September 19, 2023 5:20 PM  
**To:** Vang, Bee "Maika" <[Bee.Vang@cpuc.ca.gov](mailto:Bee.Vang@cpuc.ca.gov)>  
**Subject:** [EXTERNAL] Blackline Holdings inc TCP-43342-B

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Bee Vang,

I am replying to your requests that I have received in the mail. Since Blackline Holdings INC was a brand new business that started on 02/23/2023 and ran for a couple of months (< 1 year), some of your document requests I don't have. I will email you what I only got.

1. see attached
2. see attached
3. no agreements
4. see attached
5. business started on 02/23/23 no history
6. business started on 02/23/23 no history
7. none
8. see attached #4

Thank you for your attention,  
With Best Regards,  
Blackline Holdings Inc.



# CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)  
04/17/2023

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT:** If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER CALANI INSURANCE SERVICES INC	CONTACT NAME:	
	PHONE (A/C, No, Ext):	
	E-MAIL ADDRESS:	
	PRODUCER CUSTOMER ID #:	
	FAX (A/C, No):	
	INSURER(S) AFFORDING COVERAGE	
	INSURER A :	NEW YORK MARINE & GENERAL INSURANCE
	INSURER B :	STATE FUND COMPENSATION INSURANCE
	INSURER C :	
	INSURER D :	
	INSURER E :	
	INSURER F :	
INSURED BLACKLINE HOLDINGS INC ARTAK AGHAJANYAN	NAIC #	

**COVERAGES**                      **CERTIFICATE NUMBER:**                      **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
	<b>GENERAL LIABILITY</b> COMMERCIAL GENERAL LIABILITY CLAIMS-MADE <input type="checkbox"/> OCCUR <input type="checkbox"/> GEN'L AGGREGATE LIMIT APPLIES PER: POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC <input type="checkbox"/>						EACH OCCURRENCE \$ DAMAGE TO RENTED PREMISES (Ea occurrence) \$ MED EXP (Any one person) \$ PERSONAL & ADV INJURY \$ GENERAL AGGREGATE \$ PRODUCTS - COMP/OP AGG \$ \$
A	<b>AUTOMOBILE LIABILITY</b> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> <input checked="" type="checkbox"/> SCHEDULED AUTOS HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS <input type="checkbox"/>				02/20/2023	05/17/2023	COMBINED SINGLE LIMIT (Ea accident) \$ 750,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$ UMBI \$ 15,000/30,000
	<b>UMBRELLA LIAB</b> <input type="checkbox"/> OCCUR <b>EXCESS LIAB</b> <input type="checkbox"/> CLAIMS-MADE DEDUCTIBLE RETENTION \$						EACH OCCURRENCE \$ AGGREGATE \$ \$ \$
B	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? <input type="checkbox"/> (Mandatory in NH) If yes, describe under SPECIAL PROVISIONS below		N/A		04/18/2023	04/18/2024	<input checked="" type="checkbox"/> WC STATUTORY LIMITS <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach ACORD 101, Additional Remarks Schedule, if more space is required)  
2019 CHEVY SUBURBAN 7-PAX LIABILITY ONLY VIN: [REDACTED]  
DRIVER>>ARTAK AGHAJANYAN

<b>CERTIFICATE HOLDER</b>	<b>CANCELLATION</b>
	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE [REDACTED]

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# ATTACHMENT 7



Circuit Charge	5/20/2023 1:32	\$0.00	1.4E+12		Normal	
Circuit Charge	5/20/2023 1:32	(\$5.00)	1.4E+12		Normal	
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Circuit Charge	5/20/2023 1:31	\$0.00	1.4E+12		Normal	
Account Replenishment	5/19/2023 3:33	\$15.00				
Circuit Charge	5/19/2023 1:32	(\$5.00)	1.4E+12		Normal	
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Circuit Charge	5/19/2023 1:30	\$0.00	1.4E+12		Normal	
Account Replenishment	5/18/2023 3:34	\$15.00				
Circuit Charge	5/18/2023 1:32	(\$5.00)	1.4E+12		Normal	
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Circuit Charge	5/18/2023 1:31	(\$5.00)	1.4E+12		Normal	
Circuit Charge	5/18/2023 1:31	\$0.00	1.4E+12		Normal	
Circuit Charge	5/18/2023 1:31	\$0.00	1.4E+12		Normal	
Circuit Charge	5/18/2023 1:31	(\$5.00)	1.4E+12		Normal	