

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DEPARTMENT OF BUSINESS REGULATIONS  
1511 PONTIAC AVENUE  
BUILDINGS 68-69  
CRANSTON, RI 02920**

<u>IN THE MATTER OF:</u>	:	
	:	
<b>RADEN, INC.,</b>	:	<b>DBR No. 05-L-0115</b>
<b>D/B/A JEEPS UNLIMITED,</b>	:	
	:	
<u>RESPONDENT.</u>	:	

**CONSENT ORDER**

The Department of Business Regulation (“Department”) and Raden Inc, d/b/a Jeeps Unlimited (“Respondent”) hereby agree that:

1. Respondent was the holder of an automobile wrecking and salvage yard License No. 223 issued March 29, 2001 pursuant to R.I. Gen. Laws § 42-14.2-1 *et seq.* (“License”).
2. In or about December of 2003, the Department was informed by the Providence Police Department that Respondent was storing wrecked and junked vehicles and parts thereof outside its fenced area.
3. In or about August of 2004, the Department inspected the Respondent’s premises and observed wrecked and junked vehicles and parts thereof stored outside its fenced area.
4. In or about May of 2005, the Department inspected the Respondent’s premises again and observed wrecked and junked vehicles and parts thereof outside its fenced area.

5. In or about February of 2006, the Department inspected the Respondent's premises again and observed wrecked and junked vehicles and parts thereof outside its fenced area.
6. Respondent was informed by the Department on numerous occasions that it must comply with R.I. Gen. Law § 42-14.2-21.
7. R.I. Gen. Law § 42-14.2-21 strictly prohibits, automobile wrecking and salvage yards, from the storage of wrecked or junked vehicles or parts thereof outside the confines of the fenced area or natural barrier.
8. On April 23, 2009, an Inspector from the Department inspecting Respondent's premises, documented that the area had been cleaned up, and that wrecked and junked vehicles and parts thereof were not outside the fenced area.
9. Pursuant to R.I. Gen. Law § 42-14.2-9 the Department may "deny, revoke, or suspend or refuse to renew a license for willful failure of the applicant or licensee to comply with the provisions of the auto wrecking and salvage yards act."
10. Based on the violations set forth in Paragraphs 1 through 6 and R.I. Gen. Laws § 42-14.2-2(a), 42-14.2-2(b), 42-14.2-3, 42-14.2-21, and 24-14-2 the Department has cause to institute administrative proceedings to sanction Respondent's License via suspension or revocation pursuant to R.I. Gen. Law § 42-14.2-9.
11. With regard to the violations set forth above, Respondent voluntarily waives his right to the hearing process, voluntarily waives his right to appeal to Superior

Court, admits that violations set forth in Paragraphs 1 through 6, and is willing to take all necessary action as delineated in this Consent Agreement to allow him to maintain his License in good-standing.

12. Respondent is hereby agrees to the following conditions in lieu of invoking his right to have the matter heard in a full, evidentiary administrative hearing as a contested case:

- a. Respondent shall pay a \$1,000 penalty to the Department, made payable to  
“General Treasurer.”
- b. Respondent shall comply with all terms and requirements for licensure under  
R.I. Gen. Law § 42-14.2

13. If Respondent fails to abide by any of the requirements of this Consent Agreement, the Department will initiate administrative proceedings to impose penalties against Respondent’s License including, but not limited to:

- i. Suspension
- ii. Revocation; and/or
- iii. such additional administrative penalties as deemed appropriate by the  
Department

Respondent shall be provided with notice and opportunity for hearing should the Department decide to take such further action.

CONSENTED TO AS TO FORM AND SUBSTANCE BY:

M. Savage 8/31/09  
Legal Counsel

[Signature]  
Ray Moulton, Respondent

RECOMMENDED BY:

[Signature]  
Ellen Balasco  
Hearing Officer  
Department of Business Regulation

**ORDER**

I have read the Hearing Officer's Recommendation in this matter, and I hereby take the following action with regard to the Recommendation:

ADOPT  
 REJECT  
 MODIFY

Dated: 09-01-2009

[Signature]  
A. Michael Marques  
Director

ORDER NO. 09-211

CERTIFICATION

I hereby certify that on the 2nd day of September, 2009 a copy of the within Consent Order was sent by certified and first class mail, postage prepaid, to the following:

Raymond Moulton  
163 Butler Avenue  
Providence, RI 02908

Raymond Moulton  
Jeeps Unlimited  
10 Ambrose Street  
Providence, RI 02908

and by first class mail to:

Edward DiPippo, Esq.  
1062 Reservoir Avenue  
Cranston, RI 02910

and by electronic transmission to:

Maria L. D'Alessandro, Associate Director  
Commercial Licensing and Racing and Athletics  
Department of Business Regulation  
1511 Pontiac Avenue  
Cranston, RI 02920

Neena Sinha Savage  
Legal Counsel  
Department of Business Regulation  
1511 Pontiac Avenue  
Cranston, RI 02920

Ellen Balasco  
Hearing Officer  
Department of Business Regulation  
1511 Pontiac Avenue  
Cranston, RI 02920

Kimberly Precious  
Implementation Aide  
Department of Business Regulation  
1511 Pontiac Avenue  
Cranston, RI 02920



**MOULTON ENTERPRISES INC.**  
**DBA JEEPS UNLIMITED**

03/09

1047

10 AMBROSE ST.  
PROVIDENCE, RI 02908-3206

DATE August 27, 2009

57-12/115  
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PAY  
TO THE  
ORDER OF

General Treasurer, State of Rhode Island

\$ 1,000.00

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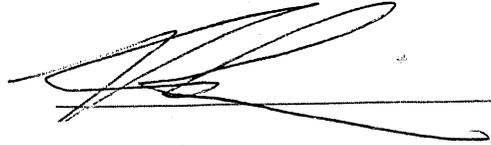
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DOLLARS

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 **Citizens Bank**  
Rhode Island

FOR DBR Penalty



MP