IN THE MATTER OF: 

RADEN, INC., 
D/B/A JEEPS UNLIMITED, 
RESPONDENT. 

DBR No. 05-L-0115 

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.”


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:

[Signature]
Legal Counsel

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 26th 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

[Signature]
MOULTON ENTERPRISES INC.
DBA JEEPS UNLIMITED
10 AMBROSE ST.
PROVIDENCE, RI 02908-3206

PAY TO THE ORDER OF: General Treasurer, State of Rhode Island $ 1,000.00

One thousand and 00/100

DOLLARS

Citizens Bank
Rhode Island

FOR DBR Penalty

MP