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September 8, 2025

**VIA ELECTRONIC FILING**

Chief, Section of Case Administration  
Office of Chief Counsel  
Surface Transportation Board  
Washington, DC 20423-0001

**Re: Michael W. Williams – Control Exemption – McCloud Railway  
Company; Ozark Valley Railroad, Inc.; and Washington & Idaho  
Railway, Inc., FD 36848**

**Motion for Leave to file Supplemental Correction and  
Supplemental Correction**

To the Chief of Case Administration:

Michael W. Williams ("Mr. Williams") respectfully moves for leave to file this Supplemental Correction to his Supplemental Verified Response served on July 14, 2025 ("Supplemental Response"). This filing is necessary to correct a factual error in the Supplemental Response that came to light after the filing was submitted. Providing the Board with the most accurate and up-to-date information is essential for a thorough and complete review of this proceeding, and so Mr. Williams urges favorable action on his motion, and the Board's consideration of the information that follows.

In the Supplemental Response, Mr. Williams stated that his daughter, Ivory Beggs, had "succeeded to a majority stake in M&B Rail, albeit under a contemplated transaction for which prior Board authorization had not yet been obtained." This statement was based on Mr. Williams' mistaken understanding that a contemplated transaction between Ms. Beggs and another individual, Brian Miller, had been finalized, and that an M&B Rail organizational chart that he had been provided reflected a consummated transaction, rather than one that was agreed to, but not yet completed.

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Counsel for Mr. Williams has since learned through recent communications with Ms. Beggs' legal counsel that the anticipated transaction has not yet occurred.

Accordingly, the statement in the Supplemental Response that Ms. Beggs holds a majority stake in M&B Rail is incorrect. In reality, Ms. Beggs continues to hold a 34% minority interest in M&B Rail, while two other individuals – Brian Miller and Dustin Shaver – each hold a 33% stake in M&B Rail, unchanged from the M&B Rail ownership mix disclosed in M&B Rail's "Notice of Substitution of Counsel and Verified Request for Permission to Withdraw Notice of Exemption" in FD 36475 (filed on August 26, 2021).

Ms. Beggs' counsel has confirmed that Ms. Beggs does not have a controlling stake in any railroad common carrier in the U.S. Her counsel (also copied to this filing) has advised that at such time as Ms. Beggs plans to move ahead with the proposed transaction under which she would succeed to a controlling interest in M&B Rail (which controls, via management, two railroad common carriers – Youngstown & Southeastern Railroad, LLC, and TransKentucky Transportation Railroad, Inc.), she will file in advance for Board authorization to undertake that transaction.

This Notice of Correction supersedes the information provided in the Supplemental Response and its accompanying Exhibit B to the extent that it indicates Ms. Beggs holds a majority ownership interest in M&B Rail. Mr. Williams regrets this error and trusts that this clarification will assist the Board in its review of this proceeding.

Respectfully submitted,

/s/ *R. A. Wimbish*

Counsel for Michael W. Williams

cc: All parties of record  
Karl Kuckleman (via email), counsel for Ivory Beggs  
Tim Hayes (via email), counsel for Ivory Beggs