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January 15, 2025
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Public Record

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

IN THE MATTER OF

TBL GROUP, INC.

– ACQUISITION OF CONTROL –

RESTON LIMOUSINE & TRAVEL SERVICE, INC.

DOCKET NO. MCF 21126

**SUPPLEMENT TO APPLICATION OF TBL GROUP, INC.
FOR APPROVAL OF THE ACQUISITION OF CONTROL OF
RESTON LIMOUSINE & TRAVEL SERVICE, INC.**

TBL Group, Inc. (“Applicant”), respectfully submits this supplement (this “Supplement”)¹ to its application (the “Subject Application”) under 49 U.S.C. § 14303 and Surface Transportation Board (“STB” or “Board”) regulations at 49 C.F.R. Part 1182 filed on November 25, 2025, for approval of the transaction described as the direct acquisition of control of Reston Limousine & Travel Service, Inc., an interstate passenger motor carrier, from its sole shareholder, Kristina Bouweiri (the “Contemplated Transaction”). This Supplement is submitted in response to the Board’s decision in this matter served on December 20, 2024, directing Applicant to provide additional information regarding its structure and holdings (the “Decision”).

¹ This Supplement was initially submitted on January 10, 2024, but was revised to correct an error in the exhibits thereto.

1. Applicant and its Affiliated Regulated Carriers. As stated in the Subject Application, Applicant is a Texas corporation, headquartered at 15734 Aldine Westfield Road, Houston, Texas 77032. As of November 25, 2025, when the Subject Application was originally submitted, Applicant controlled three (3) interstate passenger motor carriers (the “Affiliated Regulated Carriers”). Applicant’s Affiliated Regulated Carriers are GBJ Inc. (“GBJ”), Echo East Coast Transportation LLC (“Echo East”), and Echo Tours & Charters, LP (“Echo Tours”). The services provided, geographic service areas, and other information relative to each of the Affiliated Regulated Carriers are as set forth in the Subject Application. Each of the Affiliated Regulated Carriers also holds intrastate passenger authority in the state of Texas: GBJ, certificate no. 005959762C; Echo East, certificate no. 009946405C; and Echo Tours, certificate no. 006620250C.

2. Applicant’s Affiliated Unregulated Carrier. In addition to the Affiliated Regulated Carriers, Applicant controls one (1) additional intrastate passenger motor carrier: Echo Windy City, LLC (“Echo Windy”), a Texas limited liability company doing business as Echo Windy City Transportation and headquartered at 15734 Aldine Westfield Rd., in Houston, Texas. Echo Windy provides traditional Illinois intrastate limousine and charter passenger transportation services primarily in the metropolitan area of Chicago, Illinois, from its base of operations at 2801 S. 25th Avenue, Broadview, Illinois.² The primary assets comprising Echo Windy were acquired by Applicant from Windy City Limousine Company,

² Applicant did not earlier identify Echo Windy in the Subject Application due to a misinterpretation of 49 C.F.R. § 1182.2(4) – specifically, the mistaken belief that disclosure was required only of *regulated* passenger motor carriers, and as such disclosure of Echo Windy was not required because Echo Windy conducts only Illinois intrastate passenger motor carrier services, and Illinois does not require or issue intrastate passenger motor carrier authority. Understanding now that all affiliates engaging in interstate and intrastate passenger motor carrier operations, regardless of whether they need or possess passenger motor carrier authority, must be disclosed, Applicant is here now providing the disclosure and description of Echo Windy.

LLC and Windy City Limousine Manager LLC (collectively, “Windy City Limousine”) pursuant to the transaction more fully described below. Echo Windy is a direct subsidiary of Applicant, although minority portions of the membership interests of Echo Windy are held by two of Echo Windy’s officer employees – George Jacobs (14.77%) and Kathleen Kahne (1.97%).³ The U.S. Department of Transportation Number assigned to Echo Windy is 4157925, and Echo Windy has no safety rating. Echo Windy recently obtained interstate passenger motor carrier authority (MC-4157925, granted January 2, 2025) to potentially itself perform some interstate passenger carrier moves – all of which are currently brokered by Echo Windy (and previously by Windy City Limousine) to third-party interstate passenger motor carriers.⁴ Echo Windy recently filed a Form OCE-46 with the FMCSA to voluntarily revoke that authority upon being advised that obtaining new interstate passenger motor carrier authority in Echo Windy requires Board approval pursuant to 11 U.S.C. § 14303. *See, e.g.,* Holland Am. Line-Westours Inc, STB Docket No. MC-F-20980 (STB served April 4, 2001). Echo Windy has not performed any interstate passenger motor carrier moves pursuant to such authority, and will continue to refrain from doing so while the voluntary revocation is being processed. Echo Windy is evaluating and will continue to evaluate its current and prospective customer base to determine whether interstate authority would be of benefit and desirable. If Echo Windy later determines that interstate authority is desirable, Applicant and Echo Windy will file with the Board an application under 11 U.S.C. § 14303 for approval to obtain such interstate authority.

³ Both Mr. Jacobs and Ms. Kahne are former employees of Windy City Limousine, and Mr. Jacobs is the controlling shareholder of Windy City Limousine.

⁴ The amount of brokered interstate passenger trips is de minimis. For example, as of January 3, 2025, less than 1% of the passenger trips booked by Echo Windy through April 12, 2025, are interstate in nature.

3. Chart Depicting All Affiliates. Attached hereto as Exhibit A is a chart depicting the intercorporate structure of Applicant, including all of Applicant's affiliates, top to bottom.⁵

4. JKS Limousines, LLC ("JKS"). As stated in the Decision, Applicant filed with the Board an application for approval to acquire substantially all of the assets of JKS on August 14, 2024 (the "JKS Application"). Applicant subsequently determined that JKS did not actually own the assets that Applicant sought to purchase, and as a result Applicant decided it would not acquire the assets of JKS. Accordingly, on September 25, 2024, Applicant filed its request for dismissal of the JKS Application, and the JKS Application was dismissed by the Board by the Board's decision served October 1, 2024. Applicant determined that the assets it was interested in acquiring were instead owned by Windy City Limousine. Applicant ultimately purchased such assets from Windy City Limousine on September 30, 2024. Applicant did not seek Board approval under 49 U.S.C. § 14303 with respect to that transaction because Windy City Limousine provided only traditional Illinois intrastate

⁵ In the Decision, the Board rightfully notes that Applicant has been inconsistent in identifying its subsidiaries in prior filings. The referenced chart depicts all of Applicant's subsidiaries, including, out of an abundance of caution, Applicant's non-motor carrier affiliates. Those non-motor carrier affiliates are: (1) Republic Equipment Works, LLC, a Texas limited liability company doing business as Echo Transportation Solutions, headquartered at 15734 Aldine Westfield Rd., in Houston, Texas, which provides heavy truck and bus maintenance services to owners and/or operators of heavy trucks and buses in the metropolitan area of Houston, Texas; and (2) ATT & Traffic Management, LLC, a Texas limited liability company doing business as American Transfers & Tours & American Traffic Management, headquartered at 15734 Aldine Westfield Rd., in Houston, Texas, which provides planning for transportation of individuals and groups at or in conjunction with events such as conventions, sporting events, tours, and other organized gatherings primarily the state of Texas. Further, Applicant's disclosure of Echo East Coast Transportation, LLC, in its March 5, 2024, filing and lack of disclosure of that entity in connection with its August 14, 2024, filing appear to be a scrivener's error. Those filings were prepared by Applicant without the benefit of legal counsel. As that discrepancy was not intentional, it should not be interpreted as Applicant having divested itself of any interest in Echo East Coast Transportation, LLC.

limousine and charter passenger transportation services,⁶ and as such Windy City Limousine was not subject to jurisdiction of the Board under 49 U.S.C. § 13501 *et seq.*, and in turn did not possess interstate passenger motor carrier operating authority.⁷

5. Verification. The verification on behalf of Applicant is as follows:

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⁶ Windy City Limousine has facilitated limited numbers of interstate passenger moves by brokering such moves to third-party motor carriers that possessed federal passenger motor carrier authority to conduct such motor carrier moves.

⁷ Adding to the confusion is the fact that JKS previously listed “Windy City Limousine Company, LLC” as a d/b/a on its USDOT record. As noted in Applicant’s March 5, 2024, filing, JKS no longer does so. This context reconciles Applicant’s actual acquisition of the assets of Windy City Limousine, rather than those of JKS, with the news articles cited by the Board regarding the acquisition – i.e. the articles referred to Windy City Limousine Company, LLC, not the distinct entity JKS (formerly d/b/a Windy City Limousine Company, LLC).

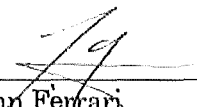
VERIFICATION

I, John Ferrari, Chief Executive Officer of Applicant, verify under penalty of perjury, under the laws of the United States of America, that all information supplied in connection with this Supplement relative to Applicant and its subsidiaries is true and correct. Further, I certify that I am qualified and authorized to file this application or pleading. I know that willful misstatements or omissions of material facts constitute Federal criminal violations punishable under 18 U.S.C. § 1001 by imprisonment up to five years and fines up to \$10,000 for each offense. Additionally, these misstatements are punishable as perjury under 18 U.S.C. § 1621, which provides for fines up to \$2,000 or imprisonment up to five years for each offense.

“Applicant”

TBL Group, Inc.

Dated: January 9, 2024

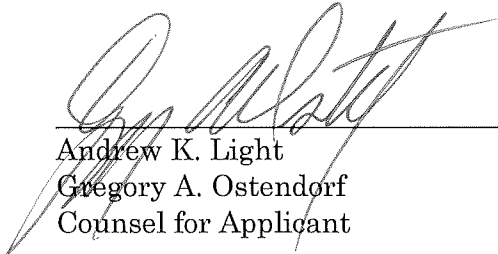
By: 
John Ferrari
Chief Executive Officer

As provided by 49 C.F.R. Part 1182 and for the reasons set forth in the Subject Application as supplemented by the contents of this Supplement, the Board is respectfully requested to approve the Subject Application and authorize the Contemplated Transaction and acquisition of control as described therein.

“Applicant”

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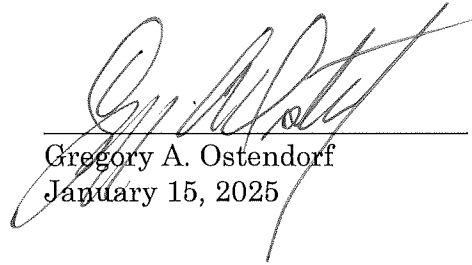
Respectfully,



Andrew K. Light
Gregory A. Ostendorf
Counsel for Applicant

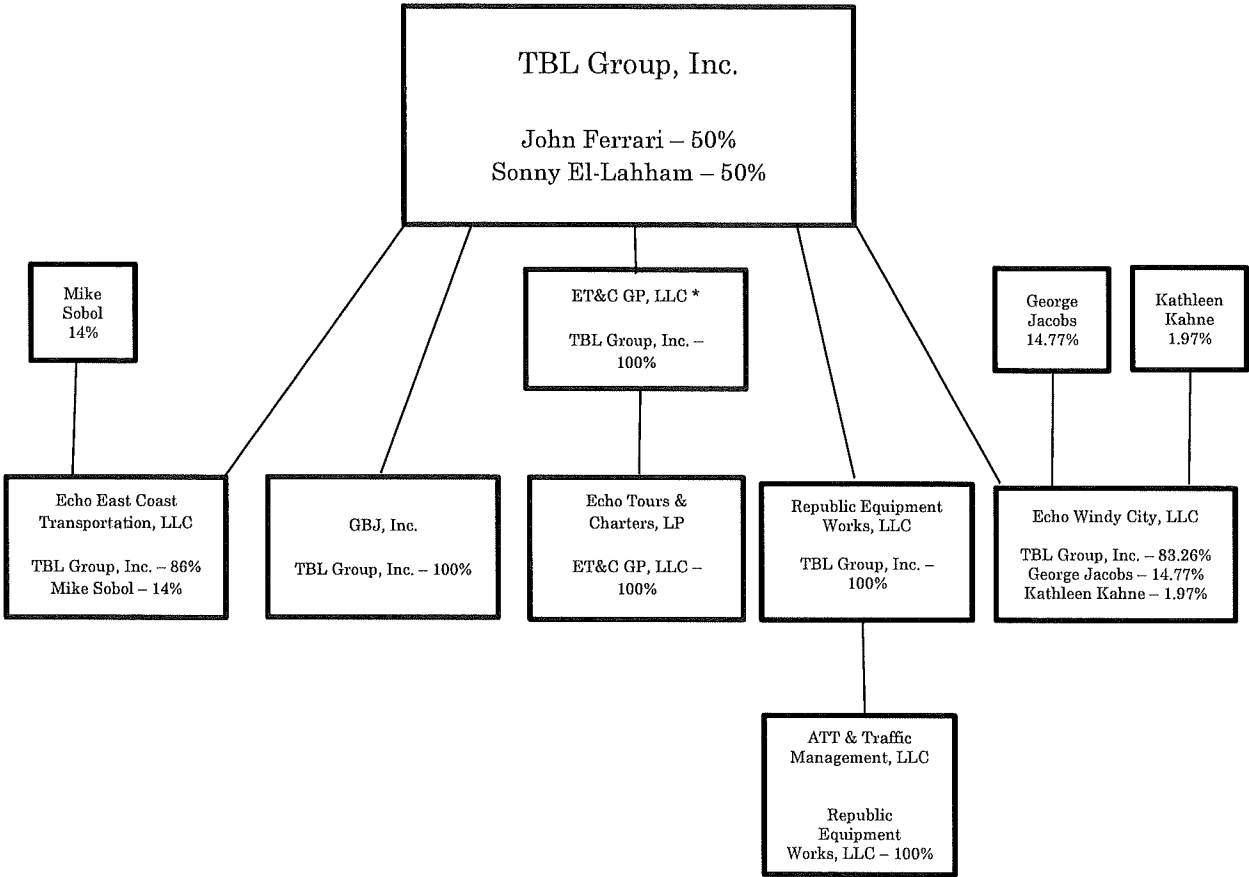
Certificate of Service

I hereby certify that as required by 49 C.F.R. § 1182.3, I have served a copy of the foregoing Supplement by mailing a copy thereof, via U.S. first-class mail on the U.S. Department of Transportation, Chief Licensing and Insurance Division, 1200 New Jersey Avenue, S.E., Mail Stop W65-331, Washington, DC 20590; and the state regulatory agency for the states in which intrastate operations are affected. I further certify that as required by 15 U.S.C. § 18a(c)(6), I have also served a copy of the foregoing Application, and copies of all other information and documentary material filed with the Surface Transportation Board in connection with the Contemplated Transaction, via email on the United States Federal Trade Commission and the Antitrust Division of the United States Department of Justice.



Gregory A. Ostendorf
January 15, 2025

Exhibit A



* ET&C GP, LLC, is merely an intermediary holding company existing between TBL Group, Inc., and Echo Tours & Charters, LP, and does not have any operations.