

ENTERED
Office of Chief Counsel
September 8, 2025
Part of
Public Record

BEFORE THE
SURFACE TRANSPORTATION BOARD

IN THE MATTER OF

TBL GROUP, INC.

-- ACQUISITION OF CONTROL --

KAPTYN NEVADA, LLC

DOCKET NO. MCF 21139

VERIFIED APPLICATION UNDER 49 U.S.C. § 14303(a) OF TBL GROUP, INC.,
FOR APPROVAL OF THE ACQUISITION OF CONTROL OF
THE ASSETS OF KAPTYN NEVADA, LLC

TBL Group, Inc. ("Applicant") respectfully submits this application under 49 U.S.C. § 14303 and Surface Transportation Board ("STB" or "Board") regulations at 49 C.F.R. Part 1182 (this "Application") for approval of the transaction more fully described herein ("Contemplated Transaction"). The Contemplated Transaction entails the indirect acquisition of control by Applicant of the primary assets of Seller, Kaptyn Nevada, LLC ("Kaptyn"), a Nevada limited liability company, through Applicant's direct subsidiary, Echo Nevada, LLC ("Echo Nevada"), a Nevada limited liability company.¹

¹ On August 25, 2025, Applicant filed an application with the Board under docket number MCF 21138, *TBL Group, Inc. – Acquisition of Control – BTM Coaches, Inc.*, seeking authority to acquire control of BTM Coaches, Inc. The Contemplated Transaction herein is wholly unrelated to the transaction which is the subject of that application.

FILED
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I. Parties of the Contemplated Transaction, Pertinent Operating Authorities, and USDOT Safety Fitness Ratings (49 C.F.R. § 1182.2(a)(1) and (2)).²

A. Applicant. Applicant is a Texas corporation, headquartered at 15734 Aldine Westfield Road, Houston, Texas 77032. The authorized signature on behalf of Applicant is set forth in the Verification of Applicant in Section XIII of this Application. Applicant is not a federally-regulated carrier, and does not have a U.S. Department of Transportation Number (“USDOT No.”), Federal Motor Carrier Safety Administration Docket Number (“FMCSA Docket No.”),³ or a safety rating assigned by U.S. Department of Transportation (“Safety Rating”).⁴ Applicant controls ten (10) other affiliated entities (“Applicant’s Affiliates”).

B. Applicant’s Affiliates. Applicant’s Affiliates are:

1. Echo Nevada, LLC (“Echo Nevada”);
2. GBJ, Inc. (“GBJ”);
3. Republic Equipment Works, LLC (“Republic”);
4. ATT & Traffic Management, LLC (“ATT”);
5. ET&C GP, LLC (“ET&C”);
6. Echo Tours & Charters, LP (“Echo Tours”);
7. Echo East Coast Transportation LLC (“Echo East”);
8. Echo Windy City, LLC (“Echo Windy”);
9. EWC Team, LLC (“EWC”); and

² This Application is organized to follow the elements set forth in the applicable rules of the Board at 49 C.F.R. § 1182.2(a).

³ An FMCSA Docket No. is the reference number assigned to a motor carrier by the Federal Motor Carrier Safety Administration for interstate motor carrier authority.

⁴ Certain of the motor carriers have not been rated by FMCSA or USDOT. If a carrier has not been rated, the Safety Rating is denoted as None.

10. Reston Limousine & Travel Service, Inc. (“Reston”).

C. Affiliated Regulated Carriers. Among Applicant’s Affiliates are five (5) interstate passenger motor carriers (the “Affiliated Regulated Carriers”):

1. GBJ. GBJ is a Texas corporation doing business as “Echo AFC Transportation,” “AFC Transportation,” and “Echo AFC Medical Transport,” primarily providing charter and contract shuttle services for companies, non-profits, schools, and tour operators. The business address, along with USDOT No., FMCSA Docket No. and Safety Rating assigned to GBJ, are set forth on the Summary Table attached hereto as Exhibit A (the “Summary Table”). The geographic service area of GBJ is primarily within the metropolitan area of Houston, Texas, but it also provides interstate charter passenger transportation service. The approximate number and types of vehicles utilized by GBJ, as well as its approximate number of drivers,⁵ are also set forth on the Summary Table. GBJ also holds intrastate passenger authority in the state of Texas under certificate no. 005959762C.

2. Echo Tours. Echo Tours is a Texas limited partnership doing business as “Echo Transportation,” primarily providing charter and contract shuttle services for companies, non-profits, schools, and tour operators. The business address, along with USDOT No., FMCSA Docket No. and Safety Rating assigned to Echo Tours are set forth on the Summary Table. The geographic service area of Echo Tours is

⁵ The numbers of vehicles and drivers reflected in the Company Snapshot of the Federal Motor Carrier Safety Administration’s Safety and Fitness Electronic Records (SAFER) System is dependent on information submitted by the applicable motor carriers on form MCS-150 (Motor Carrier Identification Report), which is required to be categorically updated biennially and only required to reflect vehicles subject to Uniform Carrier Registration; however, carriers can include intrastate vehicles and drivers that are not required to be included. Accordingly, the number of vehicles and drivers reflected in the Company Snapshot may not be the same as the number of vehicles and drivers in use by a carrier at a given point in time. Additionally, the numbers of vehicles and drivers for a carrier will fluctuate from time to time.

primarily the metropolitan area of Dallas, Texas, but it also provides interstate charter passenger transportation service. The approximate number and types of vehicles utilized by Echo Tours, and its approximate number of drivers, are set forth on the Summary Table. Echo Tours also holds intrastate passenger authority in the state of Texas under certificate no. 006620250C. Echo Tours is wholly owned by ET&C (described below).

3. Echo East. Echo East is a Texas limited liability company doing business as “Echo East Coast Transportation,” primarily providing passenger contract shuttle and charter vehicle services. The business address, along with USDOT No., FMCSA Docket No. and Safety Rating assigned to Echo East, are set forth on the Summary Table. The geographic service area of Echo East is primarily the metropolitan area of Jacksonville, Florida, and its primary service offerings are interstate and intrastate contract and charter motor carrier passenger service. The approximate number and types of vehicles utilized by Echo East, as well as its approximate number of drivers, are set forth on the Summary Table. While Echo East is controlled by Applicant, Mike Sobol, an employee of Echo East, holds a minority membership interest (14%) in Echo East. Echo East also holds intrastate passenger authority in the state of Texas under certificate no. 009946405C (although such authority is not necessary based on its current operations).

4. Echo Windy. Echo Windy is a Texas limited liability company, doing business as “Echo Windy City Transportation.” The business address, along with USDOT No., FMCSA Docket No. and Safety Rating assigned to Echo Windy are set forth on the Summary Table. The approximate number and types of vehicles utilized by Echo Windy, as well as its approximate number of drivers, are set forth on the

Summary Table. The geographic service area of Echo Windy is primarily the metropolitan area of Chicago, Illinois, and its primary service offering is intrastate limousine and charter passenger service. No intrastate passenger motor carrier authority is required in the state of Illinois. Echo Windy can also provide interstate passenger limousine and charter passenger services. While Echo Windy is controlled by Applicant, employees George Jacobs and Kathleen Kahne hold minority membership interests (14.77% and 1.97%, respectively) in Echo Windy.

5. Reston. Reston is a Virginia corporation. The business address, along with USDOT No., FMCSA Docket No. and Safety Rating assigned to Reston are set forth on the Summary Table. Reston provides limousine, shuttle, and charter passenger service, interstate and intrastate, in the metropolitan area of Washington D.C. The approximate number and types of vehicles utilized by Reston, and its approximate number of drivers, are set forth on the Summary Table. Reston also holds intrastate passenger carrier authorities issued by the Maryland Public Service Commission, the Virginia Department of Motor Vehicles, and the Washington Metropolitan Area Transit Commission.

D. Unregulated Affiliates. Other than the Affiliated Regulated Carriers described above and Echo Nevada (described below), the remainder of Applicant's Affiliates (the "Unregulated Affiliates") do not hold and their respective operations do not require interstate passenger motor carrier authority. The Unregulated Affiliates are:

1. Republic. Republic is a Texas limited liability company doing business as "Echo Transportation Solutions" and "Republic Fleet Services," and is headquartered at 15734 Aldine Westfield Rd., in Houston, Texas. Republic provides maintenance and repair services to owners and/or operators of heavy trucks and buses

in the metropolitan areas of Houston and Dallas, Texas. Republic is a direct subsidiary of Applicant and is not a motor carrier of passengers.

2. ATT. ATT is a Texas limited liability company doing business as “American Transfers & Tours” and “American Traffic Management,” and is headquartered at 15734 Aldine Westfield Rd., in Houston, Texas. ATT provides transportation planning for individuals and groups at or in conjunction with activities such as conventions, sporting events, tours, and other organized gatherings. The geographic area serviced by ATT is primarily the state of Texas. ATT is a direct subsidiary of Republic and thus an indirect subsidiary of Applicant. ATT is not a passenger motor carrier.

3. ET&C. ET&C is a Texas limited liability company that serves as an intermediate holding company of all the partnership interests in Echo Tours and is wholly owned by Applicant. ET&C is headquartered at 15734 Aldine Westfield Rd., in Houston, Texas. ET&C is a direct subsidiary of Applicant. ET&C is not a motor carrier of passengers and has no other purpose or operation other than serving as an intermediate holding company.

4. EWC. EWC is a Texas limited liability company headquartered at 15734 Aldine Westfield Rd., in Houston, Texas. EWC is a small administrative services provider and is not a motor carrier of passengers.

E. Echo Nevada. Echo Nevada is a Nevada limited liability company that is being organized to acquire the primary assets of Kaptyn (including Kaptyn’s intrastate authorities and permits) and operate essentially the same business as Kaptyn (described below) with its own interstate passenger motor carrier authority. Echo Nevada is currently headquartered at 15734 Aldine Westfield Rd., in Houston, Texas; however, following the closing of the

Contemplated Transaction it is anticipated that Echo Nevada headquarters will be moved to 4675 Wynn Road, Las Vegas, NV 89103 (the current address of Kaptyn as described below). In anticipation and preparation for the Contemplated Transaction, Echo Nevada has obtained USDOT Number 4451630 and has applied for interstate passenger motor carrier authority under FMCSA Docket No. 1754321 (the “Pending Interstate Authority”). Echo Nevada will not active or utilize the Pending Interstate Authority until the Board has authorized the Contemplated Transaction.

F. Kaptyn. Kaptyn was formed in 2019 and is a provider of premium limousine and black car transportation services primarily in the metropolitan area of Clark County (including of course, Las Vegas), Nevada (the “Kaptyn Service Area”), under the fictitious firm names, Presidential Transportation and Presidential Limousine, from its primary office at 4675 Wynn Road, Las Vegas, NV 89103. Kaptyn’s assigned USDOT No. is 3396612, and Kaptyn has a “Satisfactory” Safety Rating. The vast majority of Kaptyn’s passenger moves are intrastate under Certificates of Public Convenience and Necessity granted by the Nevada Transit Authority (CPCN numbers 1007, 1040, 2119 and 2063), as well as a general business license to operate granted by the City of Las Vegas, NV. Kaptyn also holds interstate passenger motor carrier authority under FMCSA Docket No. MC-1092594. In its operations, Kaptyn utilizes a combination of approximately 100 sedans, limousines, and SUVs, as well as 2 twenty passenger limo mini-buses, and 2 thirty-one passenger minibuses. Kaptyn employs approximately 175 personnel, including drivers. Kaptyn does not have any direct or indirect ownership interest in any interstate passenger motor carrier. Andrew Meyers serves as President of Kaptyn, maintains his office at 4675 Wynn Road, Las Vegas, NV 89103, and will continue to serve Echo Nevada as a consultant after the Contemplated Transaction. The

authorized signature on behalf of Kaptyn is set forth in the Verification of Kaptyn in Section XIII of this Application.

G. Sole Member of Kaptyn. Kaptyn is wholly owned by Kaptyn Holding Corp. (“KHC” or “Member”), a Delaware corporation under private ownership by five individuals and private family offices; none of whom hold more than 50% ownership interest in KHC or have an interest in any other interstate passenger motor carriers. KHC is currently located at 4675 Wynn Road, Las Vegas, NV 89103. KHC does not have any ownership interest in any other interstate passenger motor carriers. KHC has 2 active wholly owned subsidiaries: (a) Kaptyn (described herein) and (b) Kaptyn Inc., a Delaware corporation, doing business as Kaptyn Technology, Inc., providing a comprehensive technology platform for booking and managing passenger transportation services. It neither owns nor operates any transportation equipment. The authorized signature on behalf of the Member is included in the Verification of Kaptyn in Section XIII of this Application.

II. Description of the Contemplated Transaction (49 C.F.R. § 1182.2(a)(3)).

The events triggering STB jurisdiction is the Contemplated Transaction through which Echo Nevada will acquire substantially all of the business assets of Kaptyn and at the same time obtain and activate its own interstate passenger motor carrier authority, the effect of which will be Echo Nevada becoming an interstate motor carrier under the control of Applicant. As such, STB’s jurisdiction is invoked by 49 U.S.C. § 14303(a)(5), as the Contemplated Transaction involves “acquisition of control of a carrier [*i.e.*, the assets of Kaptyn through Echo Nevada] by a person that is not a carrier but that controls any number of carriers [*i.e.*, Applicant].” We note that 49 U.S.C. § 14303(f) states “a carrier or a corporation participating in or resulting from a transaction approved by the Board under this Section may carry out the transaction, own and operate property, and exercise control or

franchises acquired through the transaction without the approval of a State authority.” Thus, the granting of this Application by the Board will avoid any potential need for state or local approval.

III. Applicant’s Federally Regulated Carrier Affiliates (49 C.F.R. § 1182.2(a)(4)).

Other than the Affiliated Regulated Carriers and Kaptyn as described above, there are no other carriers with regulated interstate operations involved in this Application; however, Echo Nevada will become a passenger carrier with regulated interstate operations upon the closing of the Contemplated Transaction and activation of its Pending Interstate Authority. The intercorporate structure of Applicant is as follows:

All of the outstanding equity stock of Applicant is owned, held and controlled by John V. Ferrari (50%) and Sonny El-Lahham (50%) (collectively, the “Shareholders”). Both Shareholders are individual U.S. citizens and residents of the state of Texas. Neither Shareholder controls any interstate passenger motor carriers other than those described in this Application. A chart depicting the intercorporate structure of Applicant is set forth on Exhibit B attached hereto. Neither Shareholder has interstate passenger motor carrier authority, a USDOT No., nor a USDOT Safety Rating. Additionally, none of the aforementioned persons or entities control any regulated interstate passenger carriers other than as set forth in this Application.

IV. Jurisdictional Statement – Revenues (49 C.F.R. § 1182.2(a)(5)).

The STB has jurisdiction over this matter under 49 U.S.C. § 14303(g), because the annual aggregate gross operating revenues of Applicant and Kaptyn exceed \$2 million during the 12-month period immediately preceding the filing of this Application.

V. Environmental Impact (49 C.F.R. § 1182.2(a)(6)).

Approval of this Application and consummation of the Contemplated Transaction will not have a significant effect on the quality of the human environment and the conservation of energy resources. The Contemplated Transaction is merely a change in control of a carrier that already provides diverse passenger transportation services. No significant operational changes are anticipated at the current time and, therefore, no environmental impact is expected.⁶

VI. Public Interest Considerations (49 C.F.R. § 1182.2(a)(7)).

The Board “shall approve and authorize a transaction” when it finds that the transaction is “consistent with the public interest.” 49 U.S.C. § 14303(b). The statutory factors the Board must consider are the “adequacy of transportation to the public,” “total fixed charges that result...” and the “interest of carrier employees affected...” *Id.*

A. Adequacy of Transportation Services. The Contemplated Transaction is not expected to have any detrimental impact on the adequacy of transportation services available to the traveling public in the Kaptyn Service Area. Applicant anticipates that services available to the public will increase as additional capacity is made available and operating efficiencies are realized through Echo Nevada. For the foreseeable future, the services

⁶ The Board has found similar transactions to be categorically excluded from environmental review under 49 C.F.R. § 1105.6(c). *See, e.g., All Aboard America! Holdings, Inc. – Acquisition of Control – Lux Bus America Co.*, STB Finance Docket No. MCF 21082, at 5 (STB served Sept. 21, 2018). Section 1105.6(c) categorically excludes Section 14303 transactions that do not implicate operational changes that exceed certain specified thresholds.

currently provided by Kaptyn will continue to be provided by Echo Nevada under the same fictitious firm names (Presidential Transportation and Presidential Limousine) used to provide such services prior to the Contemplated Transaction. The addition of Kaptyn through Echo Nevada to the holdings of Applicant is consistent with the practices within the passenger motor carrier industry of strong, well-managed transportation organizations adapting their corporate structure to operate several different passenger carriers within similar service markets, but in different geographic areas. The Contemplated Transaction will bring Kaptyn assets (through Echo Nevada) under the control of Applicant, which is experienced in the same market segments served by Kaptyn, being limousine, black car and charter services. Such market segments have their own service characteristics, and the Contemplated Transaction, combined with the passenger carrier management capacity of Applicant, is expected to result in improved operating efficiencies, increased equipment utilization rates, and cost savings derived from economies of scale within the Applicant's Affiliates, all of which will help to ensure the provision of adequate service to the public.

The addition of Kaptyn assets through Echo Nevada to Applicant will serve to enhance the viability of the Applicant's organization and the Applicant's Affiliates. The continued viability of Applicant and the Applicant's Affiliates assures the continued availability of adequate passenger transportation service for the public in the areas served by the Applicant's Affiliates.

B. Fixed Charges. The Contemplated Transaction will increase fixed charges, in the form of interest expense, because funds will be borrowed to assist in the financing of the

Contemplated Transaction. However, such an increase will not impact the provision of transportation services to the public.⁷

C. Employee Interests. It is the current intention of Applicant to continue the existing operations of Kaptyn under Echo Nevada, and that Echo Nevada will offer employment to substantially all current employees of Kaptyn without any negative changes in compensation levels and/or benefits, although staffing redundancies could potentially result in limited downsizing of back-office and/or managerial level personnel.

D. Competition and the Public Interest. The law requires the Board to assess competition in the market and the impact on the public interest as affected by approving an arrangement in which multiple passenger carriers are under the control of a single entity. In making such analysis, the Board (as did its predecessor, the Interstate Commerce Commission) has consistently found that proposed “common control” arrangements (however accomplished) are inherently not anti-competitive. In large measure, that conclusion rests on the finding that because of the ease of entry into the market, the passenger motor carrier industry is characterized by healthy intra-modal competition as well as healthy competition between bus service, on the one hand, and, on the other, other modes of transportation, all of which constitute the “relevant market.” *GLI Acquisition Co – Purchase – Trailways Lines, Inc.*, 4 I.C.C. 2d 591, 598-602 (1988).

On the rare occasions in recent years in which the Board has been called upon to assess the “public interest” and “competition” issues inherent in the practice of the

⁷ The Board has approved transactions that use debt financing in the past, despite some increase to interest expense. See, e.g., *Variant Equity I, LP, and Project Kenwood Acquisition, LLC – Acquisition of Control – Coach USA Administration, Inc.*, and *Coach USA, Inc.*, STB Docket No. 21084, at 4 (served February 15, 2019), and *Sureride Charter Inc. – Acquisition of Control – McClintock Enterprises, Inc., D/B/A Goldfield State & Co.*, STB Docket No. 21077, at 3 (served November 2, 2017).

acquisition of ownership of numerous bus carriers by non-carrier entities, it has consistently approved applications of this sort, finding that acquisitions that contemplate the single control of numerous passenger carriers can result in better overall service for the public without any lessening of the benefits of healthy competition. Its decisions include *Winthrop Sargent, John Cogliano, and Paul Fuerst – Acquisition of Control – Plymouth and Brockton Street Railway Company, Brush Hill Transportation Company, and McGinn Bus Company, Inc.*, STB Docket No. MCF 21089, (served January 3, 2020); *Transportation Demand Management Holdings, LLC – Acquisition of Control – Badger Bus Transportation Group, Inc.*, STB Docket No. MCF 21088 (served November 8, 2019); and *AAAH Regional Acquisition LLC – Acquisition of Control – First Class Tours, Inc. and Sierra Stage Coaches, Inc.*, STB Docket No. MCF 21087 (served November 1, 2019).

The demand for passenger surface transportation in the Kaptyn Service Area is very strong. The Las Vegas Valley continues to have population growth as well as growth of activities and events that create and increase the demand for passenger surface transportation. While there is significant demand for passenger services, passengers have a number of options from which to choose. Kaptyn currently competes directly with dozens of other car/limousine providers such as Bell Limousine, VIP Limousines of Nevada, Personal Sedan Service, Five Star Limousine, and 24/7 Limousine, just to name a few. In addition, Kaptyn and all other similar surface passenger service providers also compete with the traditional charter bus providers, passenger transportation network providers (Uber, Lyft, etc.), and to an extent, public transportation including the Las Vegas Monorail.

The Kaptyn Service Area is geographically dispersed from service areas of the Affiliated Regulated Carriers, and there is no overlap in customer bases among the Affiliated Regulated Carriers and Kaptyn in that regard.

As mentioned above, the operations of Kaptyn are expected to continue under Echo Nevada without change or interruption after the closing of the Contemplated Transaction, with Mr. Meyers providing consulting services to Echo Nevada for the transition. Considering the foregoing, it is clear the impact of the Contemplated Transaction on the regulated motor carrier industry will be minimal at most and that neither competition nor the public interest will be adversely affected.

Board approval of this Application will allow the acquisition of control of the assets of Kaptyn through Echo Nevada to be accomplished without the approval of state regulatory authorities, thus relieving the parties of the Contemplated Transaction from potentially burdensome regulatory requirements. See 49 U.S.C. § 14303(f).⁸

VII. Safety Fitness Certification (49 C.F.R. § 1182.2(a)(8)).

Applicant certifies that the Safety Rating (if any) for each of the Affiliated Regulated Carriers is as set forth on the Summary Table. Seller certifies that the Safety Rating of Kaptyn is as set forth hereinabove.

⁸ 49 U.S.C. § 14303(f) provides that “A carrier or corporation participating in or resulting from a transaction approved by the [Surface Transportation] Board under this section, or exempted by the Board from the application of this section pursuant to section 13541, may carry out the transaction, own and operate property, and exercise control or franchises acquired through the transaction without the approval of a State authority. A carrier, corporation, or person participating in the approved or exempted transaction is exempt from the antitrust laws and from all other law, including State and municipal law, as necessary to let that person carry out the transaction, hold, maintain, and operate property, and exercise control or franchises acquired through the transaction.”

VIII. Insurance Certification (49 C.F.R. § 1182.2(a)(9)).

Kaptyn certifies that Kaptyn currently has the requisite insurance coverage under 49 U.S.C. § 13906. Applicant certifies that Echo Nevada immediately following the closing of the Contemplated Transaction will have the requisite insurance coverage under 49 U.S.C. § 13906.

IX. Mexico Certification (49 C.F.R. § 1182.2(a)(10)).

A. Applicant. Applicant certifies that neither it nor any of the Affiliated Regulated Carriers are domiciled in Mexico, nor are any of such entities owned or controlled by persons of that country.

B. Kaptyn. Kaptyn certifies that it is neither domiciled in Mexico, nor owned or controlled by persons of that country.

X. No Individuals Holding Operating Authority (49 C.F.R. § 1182.2(a)(11)).

The Contemplated Transaction does not involve the transfer of operating authority to an individual who will hold the authority in his or her name.

XI. Exempt Transaction under Federal Premerger Notification Laws.

Pursuant to 15 U.S.C. § 18a(c)(6), this Application and copies of all other information and documentary material filed with the Board in connection with the Contemplated Transaction are being filed with the United States Federal Trade Commission and the Antitrust Division of the United States Department of Justice in keeping with the Contemplated Transaction's status under the regulated-industry provisions of that statute.

XII. Conclusion.

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

XIII. Verification.

The verifications of Applicant, Kaptyn and the Members are as follow:

[Remainder of Page Intentionally Blank – Verification and Signature Pages Follow]

VERIFICATION

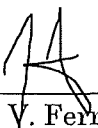
I, John V. Ferrari, Chief Executive Officer of Applicant, verify under penalty of perjury, under the laws of the United States of America, that all information supplied in connection with this Application relative to Applicant is true and correct. Further, I certify that I am qualified and authorized 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: September 5, 2025

By: _____


John V. Ferrari
Chief Executive Officer

Printed Name

VERIFICATION

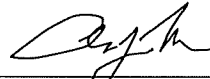
The undersigned verifies under penalty of perjury under the laws of the United States of America, that all information supplied by such person on behalf of and limited to Kaptyn and the Member in connection with this Application is true and correct. Further, the undersigned with respect to Kaptyn and the Member, respectively, is qualified and authorized on behalf of Kaptyn and the Member, respectively, to submit this verification and file this Application. The undersigned further certifies under penalty of perjury under the laws of the United States, that willful misrepresentations 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 under 18 U.S.C. § 1621, which provides for fines up to \$2,000 or imprisonment up to five years for each offense.

“Kaptyn”

Kaptyn Nevada, LLC

Dated: September 6, 2025

By: _____



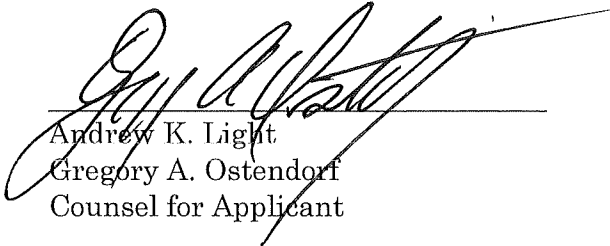
Andrew Meyers
President

XIV. Applicant Legal Counsel.

“Applicant”

Andrew K. Light
Gregory A. Ostendorf
Scopelitis, Garvin, Light, Hanson & Feary, P.C.
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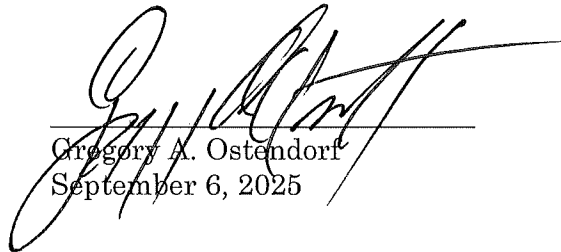
Respectfully,



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 Application 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
September 6, 2025

Exhibit A
Summary Table

<u>Entity Names</u>	<u>USDOT No.</u>	<u>FMCSA Docket No.</u>	<u>USDOT Safety Rating</u>	<u>Vehicles and Drivers</u>
GBJ Inc. 15734 Aldine Westfield Rd., Houston, TX 77032	835782	MC-369531	Satisfactory	Motor Coach – 37 School Bus – 8 Mini-Bus – 23 Drivers – 68
Echo East Coast Transportation LLC 1712 Ogilvie Park Ln. Jacksonville, FL 32246	4148029	MC-1591798	Satisfactory	Motor Coach – 9 Mini-Bus – 15 Van – 11 Drivers – 32
Echo Tours & Charters, LP 1505 Skyline Rd., Dallas, TX 75051	2172280	MC-755212	Satisfactory	Motor Coach – 46 Mini-Bus – 28 Drivers – 100
Echo Windy City, LLC 2801 S. 25th Avenue, Broadview, IL 60155	4157925	MC-1597383	None	Motor Coach – 41 Mini-Bus – 33 Van – 12 Drivers – 134
Reston Limousine & Travel Service, Inc. 45685 Elmwood Ct. Sterling, VA 20166	561180	MC-273787	Satisfactory	Motor Coach – 21 Mini-Bus – 115 Van – 40 Drivers – 174

Exhibit B

[See Attached]

TBL Group, Inc.
Structure Chart

