

**BEFORE THE
SURFACE TRANSPORTATION BOARD****IN THE MATTER OF AMERICAN SAFETY HOLDINGS, LLC, A LOUISIANA
LIMITED LIABILITY COMPANY****--ACQUISITION OF PROPERTY--****AMERICAN-INTERNATIONAL TRAVEL, INC. D/B/A DIXIELAND TOURS &
CRUISES, A LOUISIANA CORPORATION****SUPPLEMENT TO APPLICATION UNDER 49 U.S.C. § 14303(a)**

AMERICAN SAFETY HOLDINGS, LLC (hereinafter “**Holdings**”) and AMERICAN SAFETY TRANSIT, LLC (hereinafter “**Transit**”) (hereinafter collectively referred to as “**Applicants**”), respectfully submit this Supplement to the Application (hereinafter “**Supplement**”) filed in this proceeding on June 17, 2025. This Supplement is being filed in accordance with the decision of the Board served on July 17, 2025 (hereinafter “**Decision**”). In this Supplement, the Applicants are seeking Board authority under 49 U.S.C. § 14303(a) and 49 C.F.R. Part 1182 for the acquisition of the property and control of AMERICAN-INTERNATIONAL TRAVEL, INC. (USDOT 438686, MC-179953), a corporation organized under the laws of the State of Louisiana and doing business under the name DIXIELAND TOURS AND CRUISES (hereinafter referred to as “**Dixieland**”) and for after-the-fact authority for the Applicant’s already consummated acquisition of property from New Orleans Tours, Inc., Airport Shuttle, LLC and Car Noir, LLC. Pursuant to the Decision, Applicant’s further seek to join Bricor Energy Group, LLC and Ana Begovich to the application filed on June 17, 2025 (hereinafter “**June 17 Application**”).

I. Joinder of Applicants

1. **BRICOR ENERGY GROUP, LLC**

In accordance with the Decision, Bricor Energy Group, LLC (hereinafter “**Bricor**”) hereby joins and incorporates by reference the June 17 Application by AMERICAN SAFETY HOLDINGS, LLC (hereinafter “**Holdings**”). Information specific to Bricor, as required under 49 CFR 1181.2, is set forth below:

- i. Bricor’s full legal name is Bricor Energy Group, LLC and its address is 112 Cambridge Drive, Belle Chasse, Louisiana 70037. An authorized signature for Bricor is included as Attachment 1 to this filing.
- ii. Bricor has no federal or state operating authority.
- iii. A description of the transaction, which is incorporated herein by reference, is included in the Section titled “The Transaction” of the June 17 Application.
- iv. No motor passenger carriers are affiliated with Bricor other than American Safety Transit, LLC.
- v. The jurisdictional statement set forth in Section, “Parties”, Subsection I, of the June 17 Application, is incorporated herein by reference.
- vi. The statements set forth in Section, “Parties”, Subsection II, of the June 17 Application, which are incorporated herein by reference, and, in summary, states that no significant effect on the human environment is expected.
- vii. The statements set forth in Section, “Parties”, Subsection III, of the June 17 Application, which is incorporated herein by reference.
- viii. Bricor certifies to the safety fitness certification set forth in Section, “Parties”, Subsection IV, of the June 17 Application, which is incorporated herein by reference.

- ix. Bricor certifies to the Insurance Certification set forth in Section, “Parties”, Subsection V, of the June 17 application, which is incorporated herein by reference.
- x. Bricor certifies that it is not domiciled in Mexico or owned or controlled by persons of that country.
- xi. The transaction described in the June 17 Application does not involve the transfer of operating authority to an individual who will hold the authority in his or her name.

2. ANA BEGOVICH

In accordance with the Decision, Ana Begovich (hereinafter “**Begovich**”) hereby joins and incorporates by reference the June 17 Application filed on June 17, 2025 by AMERICAN SAFETY HOLDINGS, LLC, (hereinafter “**Holdings**”). Information specific to Begovich, as required under 49 CFR 1181.2, is set forth below:

- i. Begovich’s full name is Ana Begovich and her address is 112 Cambridge Drive, Belle Chasse, Louisiana 70037. An authorized signature for Ana Begovich is included as Attachment 1 to this filing.
- ii. Ana Begovich has no federal or state operating authority.
- iii. A description of the transaction, which is incorporated herein by reference, is included in the Section titled “The Transaction” of the June 17 Application.
- iv. No motor passenger carriers are affiliated with Ana Begovich other than American Safety Transit, LLC.
- v. The jurisdictional statement set forth in Section, “Parties”, Subsection I, of the June 17 Application, is incorporated herein by reference.
- vi. The statements set forth in Section, “Parties”, Subsection II, of the June 17 Application, which are incorporated herein by reference, and, in summary, states that no significant effect on the human environment is expected.

- vii. The statements set forth in Section, “Parties”, Subsection III, of the June 17 Application, which is incorporated herein by reference.
- viii. Begovich certifies to the safety fitness certification set forth in Section, “Parties”, Subsection IV, of the June 17 Application, which is incorporated herein by reference.
- ix. Begovich certifies to the Insurance Certification set forth in Section, “Parties”, Subsection V, of the June 17 application, which is incorporated herein by reference.
- x. Begovich certifies that it is not domiciled in Mexico or owned or controlled by persons of that country.
- xi. The transaction described in the June 17 Application does not involve the transfer of operating authority to an individual who will hold the authority in his or her name.

II. Clarification of Operating Authority American Safety, LLC

American Safety, LLC is not a Carrier. American Safety, LLC operates solely as a broker and the discrepancy on page 5 of the Application was inadvertent.

III. Acquisition of Property of New Orleans Tours, Inc.

On December 31, 2024, Holdings acquired several motor coaches from New Orleans Tours, Inc. and its affiliates, as further described in Article VII of this Supplement (hereinafter “**New Orleans Tours**”). The entity, New Orleans Tours, Inc., was not acquired by Holdings. After consummation of the transaction, on February 18, 2025, American Safety, LLC (hereinafter “**American Safety**”) and Bricor formed New Orleans Tours, LLC to serve as a marketing company. New Orleans Tours, LLC is not a carrier, and this entity is solely used for marketing purposes. New Orleans Tours, LLC has been added to the updated organization chart identified in *Exhibit A*, attached herein.

At the time of the acquisition, Holdings was not aware that the Transaction required approval by the Board per 49 U.S.C. § 14303(a). 49 U.S.C. § 14303(a) (2) states that approval is

necessary for, “a purchase, lease, or contract to operate property of another carrier by any number of carriers. Although there was a purchase of property from a carrier, namely New Orleans Tours, the purchaser, Holdings, was a non-carrier. Further, 49 U.S.C. § 14303(a) (5) states that approval is necessary for, “acquisition or control of a carrier by a person that is not a carrier, but that controls any number of carriers.” Holdings acquired the property of New Orleans Tours; Holdings does not control any carriers. However, two separate entities, both Holdings and Transit, are owned by the same two members, namely Bricor and American Safety, LLC. For the avoidance of doubt, and in the event that Holdings inadvertently proceeded with the transaction improperly without first obtaining Board approval, Applicants, through this Supplement, seek after-the-fact authority for the Applicant’s already consummated acquisition of control of the following motor carrier, namely New Orleans Tours, Inc. and its affiliates.

IV. Disclosure of Affiliates

The only undisclosed affiliate is New Orleans Tours, LLC. As stated above, the sole members of New Orleans Tours, LLC are American Safety and Bricor. This entity was formed shortly after the transaction with New Orleans Tours for marketing purposes. New Orleans Tours, LLC does not have a DOT number and is not a carrier. Unintentionally, this entity was overlooked by Applicants when filing the Application. An updated organization chart has been provided in Exhibit A herein.

V. Scope of Operations and Extent of Interstate Commerce of Dixieland and Transit

Dixieland has its principal place of business at 10520 S. Choctaw Dr., Baton Rouge, LA 70815. Dixieland provides motorcoach service on a charter basis; it does not provide any regularly scheduled motor coach service. Dixieland operates 21 power units, all based out of Dixieland’s only location in Baton Rouge, and employs approximately 39 drivers. Dixieland offers event-specific

charter services for sporting events, weddings, conventions and other events, and its customers largely consist of schools and universities, the military, churches and civic organizations.

During the year ended May 31, 2025, 82% of Dixieland's charter service bookings were for intrastate travel. Ninety percent of Dixieland's service originates within 300 miles of its Baton Rouge terminal. With respect to its out-of-state motorcoach business, Dixieland operates mostly in the neighboring states of Texas, Mississippi, Alabama and Florida. Dixieland has intrastate operating authority from the Louisiana Public Service Commission Transportation Division (Active Charter Bus Carrier RI #1017) and interstate operating authority from the FMCSA (MC No. 139270; U.S. DOT No. 438686). Dixieland holds a "Satisfactory" safety rating from the U.S. Department of Transportation.

Transit currently provides contractual labor transportation services within the state of Louisiana, with aims of expanding this service to the state of Texas. Post acquisition from New Orleans Tours, Transit will also expand its services to provide contractual shuttle and charter services to the public for events, conventions, sporting events and site seeing tours.

VI. Competitive Conditions

Dixieland's motorcoach service is subject to intense competition from local, regional and national motorcoach providers, as well as other modes of transportation, including private motor vehicles, intercity passenger rail and passenger airline service. There are several competitors for motorcoach services in Baton Rouge and across southeast Louisiana with whom Dixieland competes on the basis of price and service. These competitors include, among others, Gaten's Adventures Unlimited, LLC, Hotard Coaches, Inc., Lewis Coaches, Inc., Limousine Livery, Ltd., Mayo Tours, Inc., Louisiana Motor Coach, Inc. and Bus Supply Charters, Inc.

Transit provides contractual labor transportation. Consequently, Dixieland and Transit are not in competition with one another. Upon notice of Dixieland's desire to sell its assets, Transit

proceeded to enter into a purchase agreement with Dixieland to acquire said assets and increase the scope of services Transit is able to provide. Upon acquisition of Dixieland's assets, Transit's hope is to achieve the necessary economies of scale to provide expanded services to the public at rates competitive with others operating within the market. Other market competitors within Louisiana include, but are not limited to, Hotard, Mayo Tours, Inc., Coach USA, Inc., and Plant Transit, Inc. Currently, Transit's largest competitor is Coach USA, Inc. and Transit's second largest competitor is Hotard.

VII. After-the-fact Authority

1. Transaction

On December 31, 2025, and as part of a single transaction, Holdings acquired substantially all of the assets of New Orleans Tours, and assets of some of its affiliates. Specifically, Holdings acquired a total of 12 motor coaches and automobiles from New Orleans Tours. An additional 15 motor coaches were owned by Airport Shuttle, Inc., an affiliate of New Orleans Tours, and acquired by Holdings as part of this same transaction. Lastly, a single sprinter van was owned by Car Noir, LLC, an affiliate of New Orleans Tours, and was acquired by Holdings as part of this same Transaction. New Orleans Tours still operates, but its operations are limited to paddlewheel tours and swamp tours, to the best of Applicant's knowledge. Holdings is not a carrier and will not operate any of the motor coaches purchased by New Orleans Tours. Rather, Transit, a carrier, shall acquire the operating rights from Holdings and operate the newly acquired motor carriers.

2. Operations of New Orleans Tours and Affiliates

a. Operations of New Orleans Tours

New Orleans Tours has its principal place of business at 4220 Howard Avenue, New Orleans, Louisiana 70125. At the time of the transaction, the shareholders of New Orleans Tours were Robert Reuther, Warren Reuther, Jr., Alexis Smith, Craig Smith, Duane Smith, Glenn Smith,

James Smith, Jr., Jason Smith, and Jeffrey Smith. New Orleans Tours provided charter and transportation services which included historical tours, paddle wheel tours, sightseeing tours, and swamp tours. The operations of New Orleans Tours were both intrastate and interstate. New Orleans Tours is a carrier and its transportation service numbers as stated in the purchase agreement are MC #160781 and LPSC RI #1021. New Orleans Tour's record through the Federal Motor Carrier Safety Administration is now inactive.

b. Operations of Affiliates

Car Noir, LLC ("**Car Noir**") has its principal place of business at 4220 Howard Avenue, New Orleans, Louisiana 70125. At the time of the transaction, the sole shareholder of Car Noir was New Orleans Tours. Car Noir was not a carrier. Only one sprinter van was purchased from Car Noir. To the best of Applicant's knowledge, Car Noir's operations were very limited.

Airport Shuttle, Inc. ("**Airport Shuttle**") has its principal place of business at 4220 Howard Avenue, New Orleans, Louisiana 70125. At the time of the transaction, the sole shareholders were Robert Reuther, Warren Reuther, Jr., Alexis Smith, Craig Smith, Duane Smith, Glenn Smith, James Smith, Jr., Jason Smith, and Jeffrey Smith. Airport Shuttle offered ride share shuttle service from the New Orleans Airport to hotels or other accommodation of its passengers. Airport Shuttle operated intrastate only and had operating authority with the New Orleans City Public Necessity Commission.

3. Jurisdictional Statement

The STB has jurisdiction over this matter under 49 U.S.C. § 14303(g) due to the aggregate gross operating revenues of Applicants and New Orleans Tours, and its Affiliates, exceeding \$2,000,000.00 during the 12 month period immediately preceding the filing of the June 17 Application.

4. Environmental Impact

Approval of this Application concerning this transaction has not had a detrimental effect on

the human and societal environment. This transaction will serve as a means to conduct the charter and transportation operations more efficiently while also conducting sightseeing tours. The transaction is anticipated to minimize environmental impact by streamlining operations under a single organization, thereby enhancing efficiency, expanding services in the charters and transportation arena, and conserving energy resources. Accordingly, the transaction is not expected to result in any significant adverse effect on the human environment. The continuation of existing operations, without material changes to service levels, equipment usage, or routing, ensures that there will be no meaningful increase in noise, air emissions, traffic congestion, or other environmental impacts. The Applicants remain committed to complying with all applicable environmental regulations and adopting best practices to minimize any potential environmental footprint; and thus, no significant effect on the human environment is expected.

5. Public Interest Considerations

The Board “shall approve and authorize a transaction” when it finds that the transaction is “consistent with public interest.” *See* 49 U.S.C § 14303(b). The statutory factors the Board considers are as follows:

- (1) the effect of the proposed transaction on the adequacy of transportation to the public;
- (2) the total fixed charges that result from the proposed transaction; and
- (3) the interest of the carrier employees affected by the proposed transaction.

a. Adequacy of Transportation Services

The transaction has materially enhanced the adequacy and efficiency of charter and transportation services provided to the public by enabling the coordinated deployment of operational assets under unified control. The acquisition of these additional motor coaches has already been implemented and allowed for more availability to the general public, resulting in greater service reliability and overall operational efficiency. This streamlined structure will advance the public

convenience and necessity, as contemplated under 49 U.S.C. § 14303.

The motor coaches will continue to be operated by Transit, an experienced and qualified motor passenger carrier with a proven track record of regulatory compliance, safety, and dependable service delivery. Transit's ongoing management has ensured both a seamless transition, without interruption of services or an adverse impact on the riding public. In the relevant geographic market, a substantial number of competitors continue to actively operate in the tourism and excursion industry, offering services such as historical sightseeing tours, paddlewheel riverboat tours, and swamp ecotours. These competitors include, but are not limited to, entities affiliated with or comprising the sellers of the motor coaches utilized in Transit's operations. The market is further characterized by low barriers to entry, seasonal fluctuations in demand, and significant consumer preference diversity, all of which contribute to a dynamic and highly competitive commercial environment, which will not be impacted by this transaction.

Moreover, the transaction will support the maintenance and enhancement of existing service levels within current markets by leveraging consolidated resources and more efficient scheduling. Concurrently, the transaction will facilitate the strategic expansion of services into new and underserved markets, thereby enhancing regional connectivity and extending access to safe, affordable, and reliable transportation options for a broader segment of the traveling public. This expansion is expected to promote equitable mobility, support local economic development, alleviate existing service gaps, and advance public interest objectives consistent with national transportation policy. The Applicant respectfully submits that the proposed Transaction serves the public interest by promoting long-term service sustainability, improving carrier viability, and aligning with the STB's statutory objectives

b. Total Fixed Charges

The consummation of the Transaction will not result in a substantial change to the total fixed

charges of the consolidated entity. The transaction will not result in an unreasonable or unsustainable level of interest expense, as it will be executed with minimal reliance on debt financing or borrowed capital since most of the assets were obtained without financing. The financial structure is designed to preserve fiscal stability and operational solvency. Furthermore, a substantial majority of the existing services will continue to be provided by Transit under the same (or lower) rates, terms, and conditions currently in effect, thereby ensuring seamless continuity in service delivery, adherence to contractual obligations, and the preservation of established customer relationships. This approach minimizes potential service disruptions and supports the public interest by maintaining dependable, affordable, and high-quality transportation options.

In light of the anticipated operational efficiencies and economies of scale to be realized through the transaction, the Applicants reasonably expect to identify and implement opportunities for future service enhancements. These improvements may include expanded route offerings, optimized scheduling, and upgraded fleet assets. Importantly, such advancements will be pursued without compromising the quality, reliability, or availability of existing services. Rather, they are intended to reinforce the Applicants' long-term commitment to service excellence, enhance customer experience, and contribute to the overall efficiency and responsiveness of the regional transportation network. Accordingly, the transaction is not expected to have any adverse financial or operational impact on public service and, instead, is likely to support ongoing improvements in service performance and customer satisfaction.

c. Interest of the Carrier Employees

The Applicants have continued the operations of New Orleans Tours without any disruption in employment for existing personnel. In fact, all former employees of New Orleans Tours were offered, and accepted, comparable or enhanced positions with Transit. As part of the transition, each employee received improved compensation and a more comprehensive benefits package relative to

the terms in effect prior to the transaction. The employment transfer was executed under substantially the same terms and conditions, resulting in a seamless transition that has proven both operationally efficient and highly beneficial to the workforce.

The Applicants do not anticipate, and have no current intention to implement, any reductions in workforce, layoffs, or adverse modifications to employee compensation or benefits. On the contrary, the transaction has produced a favorable impact on labor conditions, advancing employee welfare and preserving continuity in labor relations. The Applicants have maintained open lines of communication with all employees and labor representatives, which has further contributed to a stable and cooperative post-transaction work environment. Accordingly, the transaction has not caused, and is not expected to cause, any material disruption to the existing workforce, but rather has demonstrably improved labor standards and employee rights in a manner consistent with public interest considerations.

6. Safety Certification

The Applicants hereby certify that Holdings' Carrier affiliates, Transit, and A&R all have Satisfactory safety ratings.

7. Insurance Certification

Applicants, hereby acknowledge, certify, and agree that Transit, who is the party acquiring the operating rights from Holdings, has the requisite insurance coverage under 49 U.S.C. § 13906 (a) and (d) for the service it intends to provide.

8. Mexico Certification

The Applicants hereby certify that the proposed Transaction does not involve the acquisition of operating authority or assets by any individuals or entities domiciled in Mexico, nor by any individuals or entities that are owned, operated, or controlled, directly or indirectly, by persons of Mexican nationality or domicile. Accordingly, the Transaction is not subject to the Page 9 of 15

foreign ownership provisions or restrictions set forth under 49 U.S.C. § 14303(e) and complies fully with all applicable statutory and regulatory requirements concerning cross-border control and ownership.

9. No Individuals Holding Operating Authority

The Applicants hereby certify that the Transaction does not involve the transfer of operating authority to any individual who will hold such authority in a personal capacity. Rather, the transfer of authority will be effectuated in accordance with applicable regulatory requirements, ensuring that the operating authority remains vested in corporate entities as appropriate and consistent with the STB's rules and policies.

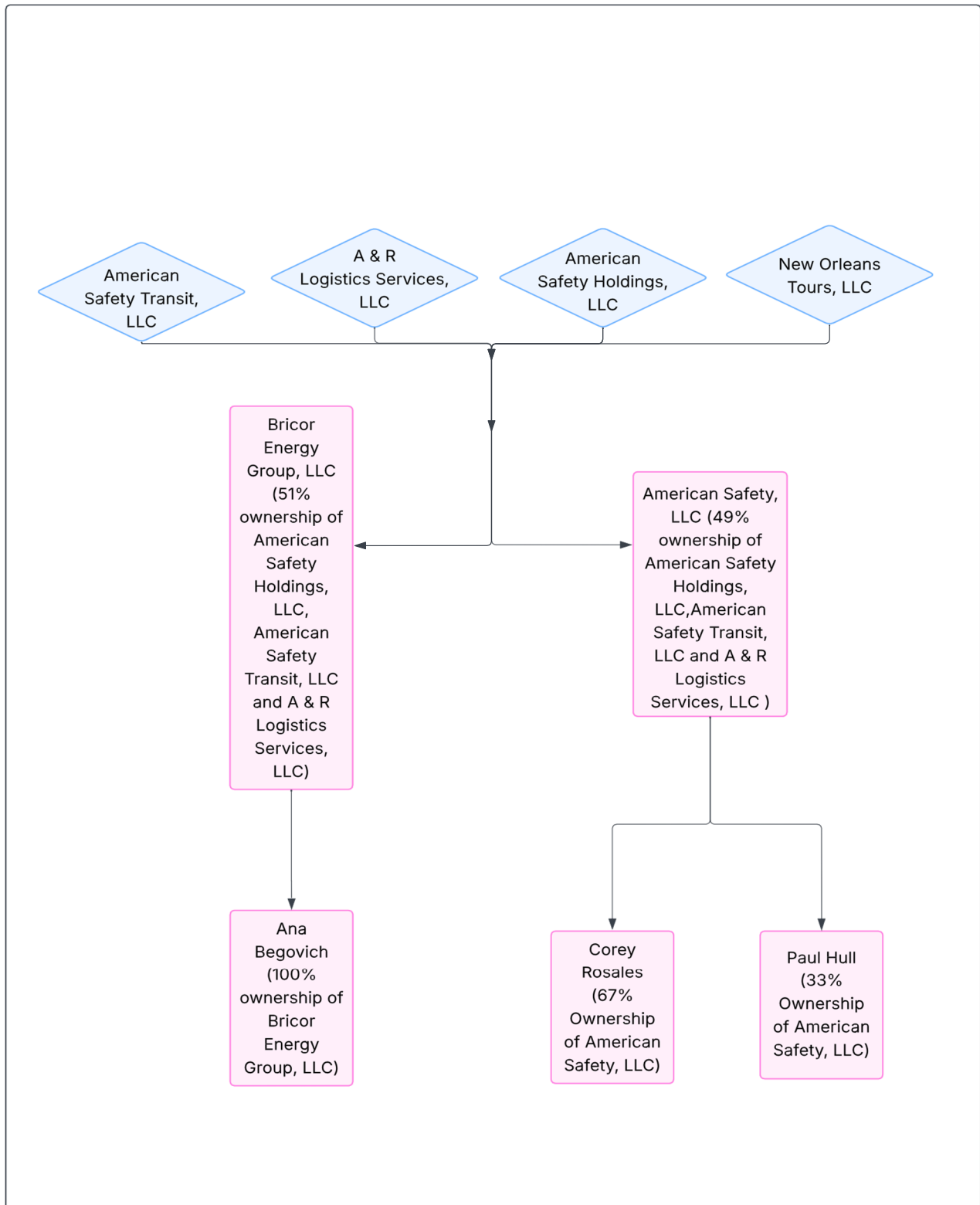
Dated: August 1, 2025

**RESPECTFULLY SUBMITTED,
RICCI PARTNERS, LLC**

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***Attorneys for Applicant, American Safety
Holdings, LLC & American Safety Transit,
LLC***

Exhibit A
ORGANIZATIONAL CHART



VERIFICATION OF APPLICANT

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 Applicant in connection with this Application is true and correct. Further, the undersigned is qualified and authorized to submit this verification and file this Application. The undersigned further certifies under penalty of perjury under the laws of the United States, that he knows 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.

“Applicant”

American Safety Holdings, LLC

By: 

Print Name: Corey Rosales

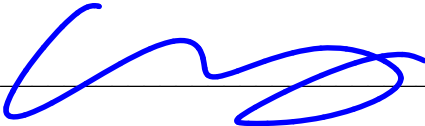
Date: 8/1/25

VERIFICATION OF APPLICANT

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 Applicant in connection with this Application is true and correct. Further, the undersigned is qualified and authorized to submit this verification and file this Application. The undersigned further certifies under penalty of perjury under the laws of the United States, that he knows 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.

“Applicant”

American Safety Transit, LLC

By: 

Print Name: Corey Rosales

Date: 8/1/25

APPLICANTS' LEGAL COUNSEL

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Respectfully,

A handwritten signature in blue ink, appearing to read 'J. Schultis', is written over a horizontal line.

Jonathan L. Schultis
Mervatt F. Eljaouhari

*Attorneys for Applicants, American
Safety Holdings, LLC & American
Safety Transit, LLC*

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this Application on the relevant state regulatory bodies in each state in which intrastate operations are affected by the Transaction, including:

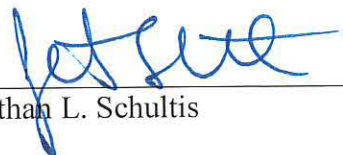
Louisiana Public Service Commission
Post Office Box 91154
Baton Rouge, Louisiana 70821-9154

I also certify that I have delivered copies of this Application to the following agency:

Federal Motor Carrier Safety Administration
Office of Registration & Safety Information
Chief, Registration, Licensing & Insurance Division
1200 New Jersey Ave. SE, Mail Stop W65-331
Washington, DC 20590

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 Transaction, via e-mail on the United States Federal Trade Commission and the Antitrust Division of the United States Department of Justice.

Dated at New Orleans, Louisiana, this 1st day of August 2025.



Jonathan L. Schultis