



**US Department
Of Transportation
Federal Motor Carrier
Safety Administration**

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Eastern Service Center

May 30, 2012

OPERATIONS OUT-OF-SERVICE

AND

RECORD CONSOLIDATION ORDER

IT IS ORDERED THAT I95 COACH, INC., COACH 88, INC., USDOT 1785178, RA TRANSPORTATION, USDOT 1856875, UNITED TOURS, INC., USDOT 1964240, TWINS JIANG CORP., USDOT 1786076, TONY BUS LINE, INC., USDOT 1479668, TONY BUS EXPRESS LINE, INC., USDOT 1628136, TONY BUS EXPRESS LINE, INC., USDOT 1490687, HU MEI EXPRESS, INC. d/b/a HUA MEI EXPRESS, USDOT 1072668 AND GO TO TRAVEL, INC., USDOT 2151433 SHALL CEASE ALL OPERATION OF ANY COMMERCIAL MOTOR VEHICLE(S) IN INTERSTATE COMMERCE ON THE EFFECTIVE DATE OF THIS ORDER AND THAT THE FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION (FMCSA) RECORDS CONCERNING EACH ENTITY SHALL BE CONSOLIDATED INTO ONE RECORD.

I. JURISDICTION

FMCSA issues this Operations Out-of-Service and Record Consolidation Order ("Order"), pursuant to 49 C.F.R. § 386.73, to I95 COACH, INC., COACH 88, INC., USDOT 1785178, RA TRANSPORTATION, USDOT 1856875, UNITED TOURS, INC., USDOT 1964240, TWINS JIANG CORP., USDOT 1786076, TONY BUS LINE, INC., USDOT 1479668, TONY BUS EXPRESS LINE, INC., USDOT 1628136, TONY BUS EXPRESS LINE, INC., USDOT 1490687, HU MEI EXPRESS, INC. d/b/a HUA MEI EXPRESS, USDOT 1072668 AND GO TO TRAVEL, INC., USDOT 2151433 (hereafter referred to by name or collectively, "you" or "affiliated carriers"), which are for-hire motor carriers subject to FMCSA jurisdiction that have operated or attempted to operate under a new identity or as affiliated entities to (i) avoid complying with an FMCSA order, (ii) avoid a statutory or regulatory requirement, (iii) avoid paying a civil penalty, (iv) avoid responding to an enforcement action, and/or (v) avoid a negative compliance history.

II. BASIS FOR ORDER

FMCSA initiated a comprehensive investigation on or about June 20, 2011 to determine the operational scope and safety management controls of each carrier identified above. During the course of the investigation, FMCSA discovered anomalies in the motor carriers' management structure. FMCSA determined that I95 Coach, Inc. is a reincarnation or continuation of United Tours, Inc., Twins Jiang Corp, Tony Bus Express Line, Inc., USDOT 1628136, Tony Bus Express Line, Inc., USDOT 1490687, and Hua Mei Express, Inc. Further, the motor carriers identified in this order are in fact affiliated carriers operating with a common organizational, management and safety control structure that functions to obscure the true nature of the motor carrier's identity and responsibility for regulatory compliance. The investigation results also revealed widespread violations of the Federal Motor Carrier Safety Regulations (FMCSR) demonstrating a continuing and flagrant disregard for regulatory compliance. Facts supporting this determination include, but are not limited to the following:

1. On June 11, 2011, FMCSA served United Tours, Inc., with an Imminent Hazard Out-of-Service Order and revoked its operating authority registration. The order was based on FMCSA's determination that United Tours' operations pose an imminent hazard to the public because United Tours failed to monitor and ensure that its drivers complied with drivers' hours of service requirements, drivers' records of duty requirements, and drivers' qualification requirements. Further, United Tours engaged in a reckless business practice of sharing drivers among several entities and concealing these drivers' hours of on-duty and/or driving time. In addition, FMCSA determined that United Tours engaged in a practice of scheduling two or more drivers to operate motor coaches and allowing these drivers to switch from driving to riding and vice-versa, without the required off-duty rest period. This determination was based on findings made during an investigation and Compliance Review of United Tours' operations. The investigation and Compliance Review revealed numerous critical and other violations of the FMCSRs. The order remains in effect.
2. On or about July 12, 2011, FMCSA served United Tours with a final Unsatisfactory safety rating based on a Compliance Review completed on May 19, 2011. The Compliance Review resulted in FMCSA finding that United Tours failed to comply with 49 C.F.R. Part 382, controlled substance and alcohol use testing requirements; 49 C.F.R. Part 391, driver qualification requirements, 49 C.F.R. Part 395; driver hours of service requirements and 49 C.F.R. Part 396; vehicle inspection, repair and maintenance requirements. The proposed rating became final on July 12, 2011 and FMCSA revoked United Tours' registration pursuant to 49 U.S.C. 13905(f)(1)(B). The order remains in effect.
3. On June 8, 2011, FMCSA served United Tours with a notice of claim seeking a civil penalty in the amount of \$2,330.00 for the violations FMCSA identified during the May 19, 2011, Compliance Review. United Tours did not respond to the notice of claim or pay the civil penalty. Accordingly, FMCSA entered a Notice of Default and Final Agency Order on July 26, 2011. On July, 26, 2011, FMCSA also served United Tours with an Order to Show Cause why the carrier's registration and authority to operate should not be revoked

for failure to pay a civil penalty. United Tours failed to respond to the Order and a Final Order to Cease Operations and Suspension of Operating Authority became effective on October 31, 2011. The civil penalty remains unpaid and the order remains in effect.

4. On July 1, 2011, FMCSA served United Tours with a notice of claim seeking a civil penalty in the amount of \$5,600.00 for violations FMCSA identified during roadside inspections conducted in Gold Rock, NC and Brooklyn, NY. United Tours did not respond to the notice of claim or pay the civil penalty. Accordingly, FMCSA entered a Notice of Default and Final Agency Order on August 17, 2011. The civil penalty was not paid within 90 days and remains unpaid today. On November 8, 2011, FMCSA issued an Order to Cease Operations and Suspension of Operating Authority to United Tours, for failure to pay a civil penalty, pursuant to 49 U.S.C. 521(b)(8), 49 C.F.R. 386.83(a)(1) and 49 C.F.R. 386.84(a)(1). The Order to Cease and Suspension of Operating Authority became effective on November 21, 2011, and remains in effect today.
5. At all times material to this Order, Hui Mei Lin, Sheng Tan Gao, and Zun Hao Lin served as United Tours' owners, officers, and/or managers and maintained controlling influence over United Tours' operations and safety management practices.
6. FMCSA served Twins Jiang Corp. with a Notice of Claim seeking a civil penalty in the amount of \$2,000.00 for the violations FMCSA identified during a March 10, 2009 Compliance Review. Twins Jiang Corp. did not respond to the notice of claim or pay the civil penalty. Accordingly, FMCSA entered a Notice of Default and Final Agency Order on April 21, 2009. The civil penalty was not paid within 90 days and remains unpaid today. On July 22, 2009, FMCSA issued an Order to Cease Operations and Suspension of Operating authority to Twins Jiang Corp., for failure to pay a civil penalty, pursuant to 49 U.S.C. 521(b)(8), 49 C.F.R. 386.83(a)(1) and 49 C.F.R. 386.84(a)(1). The Order to Cease and Suspension of Operating Authority became effected on July 27, 2009, and remains in effect today.
7. At all times material to this Order, Hui Mei Lin and Jing Sun served as Twins Jiang Corp. owners, officers, and/or managers and maintained controlling influence over Twins Jiang Corp. operations and safety management practices.
8. On October 2, 2008, FMCSA revoked Coach 88, Inc.'s New Entrant registration and ordered the carrier to cease all interstate transportation. Coach 88, Inc. never applied for or received interstate operating authority pursuant to 49 U.S.C. 13902.
9. Nonetheless, as of June 9, 2011, Coach 88 continued, among other things, to sell tickets, direct routes and direct passenger movement for transportation between New York and North Carolina, South Carolina, Georgia and Florida. Tickets were available for purchase in person at 87 Chrystie Street, New York, NY or online at www.108tours.com. These continued operations are in violation of the October 2, 2008, Order.

10. At all times material to this Order, Hui Mei Lin served as Coach 88, Inc.'s owner, officer, or manager and maintained controlling influence over Coach 88, Inc.'s operations and safety management practices.
11. On September 23, 2008, FMCSA served Tony Bus Express Line, Inc. USDOT # 1628136, with notice of a proposed Unsatisfactory safety rating based on a Compliance Review completed on September 12, 2008. That Compliance Review resulted in FMCSA finding that Tony Bus Express Line, Inc. USDOT # 1628136, failed to comply with 49 C.F.R. Part 382, controlled substance and alcohol use testing requirements; 49 C.F.R. Part 391, driver qualification requirements; 49 C.F.R. Part 395, driver hours of service requirements; and 49 C.F.R. Part 396, vehicle inspection, repair and maintenance requirements. The proposed rating became final on November 8, 2008, and FMCSA consequently ordered Tony Bus Express Line, Inc., USDOT # 1628136 to cease operations, and it revoked the carrier's registration. The final Unsatisfactory safety rating remains in effect.
12. On March 26, 2009, FMCSA served Tony Bus Express Line, Inc. USDOT # 1628136 with a Notice of Claim seeking a civil penalty in the amount of \$2,030.00 for the violations FMCSA identified during a September 12, 2008, Compliance Review. Tony Bus Express Line, Inc. USDOT # 1628136 did not respond to the notice of claim or pay the civil penalty. Accordingly, FMCSA entered a Notice of Default and Final Agency Order on May 1, 2009. The civil penalty was not paid within 90 days and remains unpaid today. On July 22, 2009, FMCSA issued an Order to Cease Operations and Suspension of Operating authority to Tony Bus Express Line, Inc. USDOT # 1628136, for failure to pay a civil penalty, pursuant to 49 U.S.C. 521(b)(8), 49 C.F.R. 386.83(a)(1) and 49 C.F.R. 386.84(a)(1). The Order to Cease and Suspension of Operating Authority became effective on August 6, 2009, and remains in effect.
13. Following the September 2008 Compliance Review, the President of Tony Bus Express Line, Inc., USDOT #1628136, admitted that Tony Bus Express Line, Inc., USDOT # 1490687 and Tony Bus Express Line, Inc., USDOT # 1628136, were in fact the same operation under the management and control of Hui Mei Lin a/k/a Linda Lin. On February 16, 2009, FMCSA provided notice to both Tony Bus Express Line, Inc. operations that FMCSA consolidated the safety records of the two entities under USDOT # 1628136.
14. On November 16, 2007, FMCSA served Tony Bus Express Line, Inc., USDOT # 1490687 with notice of a proposed Unsatisfactory safety rating based on a Compliance Review completed on November 15, 2007, which resulted in FMCSA finding that Tony Bus Express Line, Inc., failed to comply with 49 C.F.R. Part 382, controlled substance and alcohol use testing requirements, 49 C.F.R. Part 391, driver qualification requirements, 49 C.F.R. Part 395, driver hours of service requirements, and 49 C.F.R. Part 396, vehicle inspection, repair and maintenance requirements. The proposed rating became final on January 1, 2008, and FMCSA consequently ordered Tony Bus Express Line, Inc., USDOT # 1490687 to cease operations, and it revoked the carrier's operating authority registration. The order remains in effect.

15. At all times material to this Order, Hui Mei Lin and Jing Sun served as owners, officers and/or managers of both Tony Bus Express Inc. operations and maintained controlling influence over both operations and safety management practices.
16. On April 10, 2006, FMCSA revoked Hua Mei Express, Inc.'s operating authority registration. Hua Mei Express, Inc.'s operating authority registration has not been reinstated.
17. At all times material to this Order, Hui Mei Lin served as Hua Mei Express, Inc.'s owner, officer, and/or manager and maintained controlling influence over Hua Mei Express, Inc.'s operations and safety management practices.
18. At all times material to this Order, Hui Mei Lin and/or Jing Sun have used multiple motor carrier identities to continually engage in motor carrier operations. From 2003 through 2007, motor carrier operations were primarily conducted between Florida and New York. The registrations for the motor carrier operations typically identified 5379 New Peachtree Road, Chamblee, GA 30341 as the principal place of business. Since approximately November 2007, all motor carrier operations described in this Order have been conducted from one primary location: 87 Chrystie Street, New York, NY 10002.
19. Currently, Hui Mei Lin, Jing Sun, Sheng Tan Gao and Zun Hao Lin, continue to conduct motor carrier operations, including among other things, dispatching drivers and vehicles, selling tickets, and providing interstate transportation, as "I-95 Coach, Inc.," from 87 Chrystie Street, New York, NY 10002.
20. At all times material to this Order, Hui Mei Lin, Jing Sun, Sheng Tan Gao and Zun Hao Lin served as the owners, officers, and/or managers and maintained controlling influence over the operations and safety management practices of I-95 Coach, Inc.
21. As of the date of this Order, RA Transportation has active operating authority registration under 49 U.S.C. 13902.
22. As of the date of this Order, Go To Travel has an active USDOT registration under 49 C.F.R. 390.19, but does not have operating authority registration under 49 U.S.C. 13902.
23. At all times material to this Order, Hui Mei Lin, Jing Sun, Sheng Tan Gao and Zun Hao Lin served as the owners, officers, and/or managers and maintained controlling influence over the operations and safety management practices of RA Transportation and Go To Travel.
24. At all times material to this Order, I95 Coach Inc., Coach 88, Inc., RA Transportation, United Tours, Inc., Twins Jiang Corp., Tony Bus Line, Inc., Tony Bus Express Line, Inc., (USDOT 1628136), Tony Bus Express Line, Inc. (USDOT 1490687), Hua Mei Express, Inc., and Go To Travel Inc., had substantial commonality of ownership, officers or management.

25. At various times material to this Order, the carriers subject to this Order shared financial responsibilities by paying the employee salaries, fuel expenses, maintenance expenses, and/or toll receipts of other carriers. Additionally, the carriers subject to this Order frequently shared drivers and vehicles.
26. At various times material to this Order, one carrier in the affiliated network would maintain responsibility for dispatching the other carrier's drivers. That carrier directed the passenger routes and controlled passenger transportation.
27. On May 9, 2011, Sheng Tan Gao, as president, filed a Form OP-1(P), Application for Motor Passenger Carrier Authority, with FMCSA on behalf of Go To Travel, Inc., USDOT 2151433. Section VIII of the Form OP-1(P) requires applicants to identify any relationship with other FMCSA-licensed entities that existed within the 3 years prior to their application. The application describes reportable relationships as including, but not limited to, those formed by "percentage of stock ownership, a loan, or a management position." Sheng Tan Gao denied having any relationship with any other FMCSA licensed entity within the past 3 years. The investigation initiated on June 20, 2011, however, has revealed that Sheng Tan Gao has had an ownership interest and/or management position in the affiliated carriers subject to this Order.
28. Over the course of FMCSA's investigation initiated on June 20, 2011, FMCSA determined that Go To Travel, Inc. is an attempted reincarnation of United Tours, Twins Jiang Corp., Tony Bus Express Line, Inc. and Hua Mei Express and/or an affiliate of the carriers subject to this Order and created to avoid complying with an FMCSA order, a statutory or regulatory requirement, paying a civil penalty, responding to an enforcement action, and/or a negative compliance history.
29. On February 20, 2009, Jing Sun, as president, filed a Form OP-1(P), Application for Motor Passenger Carrier Authority, with FMCSA on behalf of RA Transportation, Inc., USDOT 1856875. Section VIII of the Form OP-1(P) requires applicants to identify any relationship with other FMCSA licensed entities that existed within the 3 years prior to their application. The application describes reportable relationships as including, but not limited to, those formed by "percentage of stock ownership, a loan, or a management position." Jing Sun provided an incomplete list of motor carrier relationships with other FMCSA licensed entities within the past 3 years. The investigation initiated on June 20, 2011, has revealed that Jing Sun has had an ownership interest and/or management position in the affiliated carriers subject to this Order, none of which were identified on RA Transportation, Inc.'s Application for motor Passenger Carrier Authority.
30. Over the course of FMCSA's investigation initiated on June 20, 2011, FMCSA determined that RA Transportation, Inc. is an attempted reincarnation of United Tours, Twins Jiang Corp., Tony Bus Express Line, Inc. and Hua Mei Express and/or an affiliate of the carriers subject to this Order and created to avoid complying with an FMCSA order, a statutory or

regulatory requirement, paying a civil penalty, responding to an enforcement action, and/or a negative compliance history.

31. The investigation initiated on or about June 20, 2011, revealed that the affiliated carriers do not adequately monitor drivers' hours of service (HOS) to ensure that they do not violate the hours-of-service regulations. The affiliated carriers' negligent oversight of drivers, including not requiring drivers to prepare and submit records of duty status, results in violations of the HOS regulations. For example, the affiliated carriers permit drivers to operate more than one bus in a given duty period, but they fail to adequately document which buses the drivers operate, resulting in drivers transporting passengers when they may be driving in excess of the maximum driving time, driving after the maximum on-duty time, and/or in violation of other HOS regulations.
32. The investigation also disclosed that the affiliated carriers have not properly implemented an alcohol or controlled substances testing program. The affiliated carriers do not consistently require pre-employment or random testing of employees to ensure that drivers are able to safely operate commercial motor vehicles. The affiliated carriers do not adequately maintain records of alcohol misuse and controlled substances use prevention programs, thereby impeding FMCSA's ability to determine the affiliated carriers' collective compliance.
33. In addition, the affiliated carriers do not comply with FMCSA driver qualification requirements. The affiliated carriers do not consistently maintain driver qualification files for all drivers operating commercial motor vehicles in affiliated carriers' operation. The affiliated carriers do not consistently require that employees operating commercial motor vehicles possess a valid commercial driver's license. As a consequence, the affiliated carriers are unable to ensure that drivers are qualified to transport passengers in commercial motor vehicles thereby substantially increasing the likelihood of injury or death to passengers and the motoring public.
34. The affiliated carriers do not have an adequate vehicle maintenance monitoring program. In fact, the affiliated carriers do not routinely require drivers to complete driver vehicle inspection reports on commercial motor vehicles. Permitting operation of unsafe commercial motor vehicles creates an unacceptable risk and potentially deadly situation for the driver, the affiliated carriers' passengers, and the motoring public.
35. The affiliated carriers have attempted to shield the true nature of their operations by failing to designate a qualifying principal place of business. Indeed, the affiliated carriers have designated multiple locations as their place of business where in fact no motor carrier operations are conducted. Further, the affiliated carriers do not maintain records required by the FMCSRs at a properly designated principal place of business. The affiliated carriers' failure to designate a qualifying principal place of business has resulted in FMCSA being unable to monitor the affiliated carriers' commercial motor vehicle operations and ensure compliance with the FMCSRs.

36. The affiliated carriers' have used their operational and management structure to mask their true identities in order to (i) avoid complying with an FMCSA order, (ii) avoid a statutory or regulatory requirement, (iii) avoid paying a civil penalty, (iv) avoid responding to an enforcement action, and/or (v) avoid being linked to a negative compliance history structure and inadequate safety management controls do not function to effectively ensure acceptable compliance with applicable safety requirements required to reduce associated risks. Moreover, the affiliated carriers' operational structure and inadequate safety management controls demonstrate flagrant disregard of the FMCSRs and pose a safety risk to the public that warrants imposition of an out-of-service order.

EFFECTIVE DATE AND ADMINISTRATIVE REVIEW

This Order shall become a Final Agency Order and be effective on the 21st day after it is served unless you request administrative review within 15 days of the date the Order is served to you.

Your petition for administrative review must be in writing and served on the Assistant Administrator, Federal Motor Carrier Safety Administration, 1200 New Jersey Ave., S.E., Washington, DC 20590-0001, Attention: Adjudications Counsel. You may also serve your petition for administrative review by electronic mail to "FMCSA.Adjudication@dot.gov". You must also serve a copy of your petition for administrative review to the Eastern Service Center Field Administrator at 801 Cromwell Park Drive, Suite N, Glen Burnie, MD 21061.

Your request for administrative review must include a copy of this Order and a statement of all factual and procedural issues in dispute. If you serve the petition for administrative review within 15 days of the date the Order was served to you, you may supplement your petition by serving the Assistant Administrator and Field Administrator with documentary evidence and/or written argument that supports your position regarding the procedural or factual issues in dispute, no later than 30 days from the date the Order was served to you.

Failure to timely serve a petition for administrative review, and supplementary evidence and argument, if any, constitutes a waiver of your right to do so and will result in the Order becoming a Final Agency Order 21 days after the Order was served.

Robert W. Miller
Eastern Service Center Field Administrator