



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

Joseph DeLorenzo  
202-366-8577

**ORDER TO SHOW CAUSE**

**RA TRANSPORTATION,  
USDOT 1856875**

HQ Tracking No.:  
FMCSA-MC2012-0002-RAT

**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**

**HUA MEI EXPRESS, INC. d/b/a HUA MEI EXPRESS,  
USDOT 1072668**

**GO TO TRAVEL, INC.,  
USDOT 2151433**

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, HUA MEI EXPRESS, INC. d/b/a HUA MEI EXPRESS, USDOT 1072668 AND GO

TO TRAVEL, INC., USDOT 2151433, COLLECTIVELY ONE MOTOR CARRIER OPERATION (hereafter referred to as "RA Transportation"), IS HEREBY ORDERED TO SHOW CAUSE WHY THE FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION ("FMCSA") SHOULD NOT REVOKE EACH OF RA Transportation's OPERATING AUTHORITY REGISTRATIONS PURSUANT TO 49 U.S.C. § 13905 FOR ITS WILLFUL FAILURE TO COMPLY WITH APPLICABLE REGULATIONS, FMCSA ORDERS OR CONDITIONS OF ITS REGISTRATION.

This ORDER TO SHOW CAUSE, issued this 30th day of May, 2012 pursuant to 49 U.S.C. § 13905 and 49 U.S.C. § 14701, is based upon an investigation initiated on or about June 20, 2011 finding RA Transportation in violation of 49 C.F.R. § 385.5, 49 C.F.R. Part 395, 49 C.F.R. Parts 40 and 382, 49 C.F.R. Parts 383 and 391, 49 C.F.R. Part 390, and 49 C.F.R. Part 396.

By this Show Cause Order, FMCSA finds that:

1. On or about June 20, 2011, FMCSA initiated an investigation concerning the operations of RA Transportation to determine the scope of the motor carrier's operations and safety management controls. During the course of the investigation, FMCSA discovered anomalies in the management structure of 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, Hua Mei Express, Inc. D/B/A Hua Mei Express, USDOT 1072668 and Go To Travel, Inc., USDOT 2151433. Upon closer inspection, FMCSA determined that the several entities are in fact collectively one motor carrier operation under common control and management. The investigation also revealed widespread violations of the Federal Motor Carrier Safety Regulations (FMCSRs) demonstrating a continuing and flagrant disregard for regulatory compliance and an organizational and safety management structure indifferent to motor carrier safety.

2. At various times, FMCSA placed segments of the collective RA Transportation motor carrier operation out-of-service. FMCSA issued these orders to individual components of the collective RA Transportation motor carrier operation because RA Transportation used its organizational and management structure, including obtaining multiple motor carrier registrations, to mask the true nature of its identity and operational scope. RA Transportation was able to continue motor carrier operations in flagrant violation of these orders until FMCSA discovered the motor carrier's true identity, organizational structure and operational scope through the Agency's investigation.
3. 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 status 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.

4. 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, which 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 final Unsatisfactory safety rating remains in effect.
5. 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 operating authority registration 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.
6. 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.

7. 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.
8. 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.
9. 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.
10. 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, which 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 revoked the carrier's registration. The order remains in effect.

11. 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.

12. 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.

13. 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 revoked the carrier's registration. The order remains in effect.

14. 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.

15. 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.

16. 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.

17. 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.

18. 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.” While it has no USDOT number or operating authority, I-95 Coach is a continuation, reincarnation and/or an affiliate of the operations of RA Transportation, from 87 Chrystie Street, New York, NY 10002.
19. 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.
20. As of the date of this Order, RA Transportation has active operating authority registration.
21. As of the date of this Order, Go To Travel has an active USDOT registration, but does not have active operating authority registration.
22. 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.
23. 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.

24. 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.
25. At various times material to this Order, one carrier in the affiliated network would maintain responsibility for dispatching the other carriers' drivers. That carrier directed the passenger routes and controlled passenger transportation.
26. On May 9, 2011, Sheng Tan Gao, as president, filed a Form OP-1(P), Application for Motor Passenger Carrier Authority, 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.
27. 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 was created to avoid an FMCSA order, a statutory or regulatory requirement, a civil penalty, an enforcement action, and/or a negative compliance history.

28. On February 20, 2009, Jing Sun, as president, filed a Form OP-1(P), Application for Motor Passenger Carrier Authority, 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.

29. Over the course of FMCSA’s investigation initiated on June 20, 2011, FMCSA determined that RA Transportation, Inc. is likely an attempted reincarnation of United Tours, Twins Jiang Corp., Tony Bus Express Line, Inc. and Hua Mei Express and/or an affiliate of all 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.

30. The investigation initiated on or about June 20, 2011, revealed that RA Transportation does not monitor its drivers’ hours of service (HOS) to ensure compliance with the hours-of-service regulations in 49 C.F.R. Part 395. RA Transportation does not require its drivers to prepare and submit records of duty status. RA Transportation’s negligent oversight of its

drivers results in violations of the HOS regulations. For example, RA Transportation's practice of permitting drivers to operate more than one bus in a given duty period, and its failure to adequately document which buses the drivers operate, results in drivers transporting passengers at a time 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 regulatory requirements.

31. The results of the investigation also disclosed that RA Transportation has not properly implemented an alcohol or controlled substances testing program. RA Transportation fails to consistently require pre-employment or random testing of employees to ensure that its drivers are able to safely operate commercial motor vehicles. RA Transportation fails to adequately maintain records of its alcohol misuse and controlled substances use prevention programs, thereby thwarting FMCSA's ability to determine RA Transportation's compliance.
32. In addition, RA Transportation fails to follow FMCSA driver qualification requirements. RA Transportation fails to consistently maintain driver qualification files for all drivers operating commercial motor vehicles in RA Transportation's operation. RA Transportation fails to consistently require that employees operating commercial motor vehicles possess a valid commercial driver's license. As a consequence, RA Transportation is unable to ensure that its drivers are qualified to transport passengers in commercial motor vehicles.
33. RA Transportation does not have an adequate vehicle maintenance monitoring program. In fact, RA Transportation does not routinely require its drivers to complete driver vehicle inspection reports on its commercial motor vehicles. Such a lack of oversight permits

operation of unsafe commercial motor vehicles in violation of applicable safety regulations in 49 C.F.R. Part 396.

34. RA Transportation has attempted to shield the true nature of its operations by failing to designate a qualifying principal place of business. Indeed, RA Transportation has designated multiple locations as its principal place of business where in fact no motor carrier operations are conducted. Further, RA Transportation does not maintain records required by the FMCSRs at a properly designated principal place of business. RA Transportation's failure to designate a qualifying principal place of business has resulted in FMCSA being unable to monitor RA Transportation's commercial motor vehicle operations and ensure compliance with the FMCSRs.
35. RA Transportation's operational structure and inadequate safety management controls do not function to effectively ensure acceptable compliance with applicable safety requirements to reduce the risk associated with violations of the FMCSRs. Moreover, RA Transportation's operational structure and inadequate safety management control demonstrate flagrant disregard of the FMCSRs and that RA Transportation is unwilling or unable to comply with applicable requirements.

#### **COMPLIANCE WITH ORDER TO SHOW CAUSE**

WITHIN 30 DAYS OF SERVICE OF THIS ORDER RA TRANSPORTATION MUST PRESENT EVIDENCE DEMONSTRATING IT HAS CORRECTED THE COMPLIANCE DEFICIENCIES IDENTIFIED IN THIS ORDER AND ALL PREVIOUS FMCSA ORDERS AND MUST SHOW GOOD CAUSE WHY FMCSA SHOULD NOT SUSPEND OR REVOKE EACH OF ITS DISCRETE REGISTRATIONS, PURSUANT TO 49 U.S.C. 13905. TO DEMONSTRATE CORRECTIVE ACTION, RA TRANSPORTATION MUST, AT A MINIMUM:

1. Comply with all orders FMCSA issued to any segment of the RA Transportation motor carrier operation;

2. Consent in writing to FMCSA permanently revoking all certificates of registration previously issued to RA Transportation pursuant to 49 U.S.C. § 13902;
3. Consent to operate under one certificate of registration and one USDOT number;
4. Consent to FMCSA consolidating the records of all USDOT numbers currently held by RA Transportation, including all affiliated carriers identified in this Order in addition to I95 Coach, Inc. and Coach 88, Inc., USDOT # 1785178;
5. Identify by name and title management officials responsible for safety oversight and compliance with the Federal Motor Carrier Safety Regulations;
6. Require its drivers to prepare Driver Vehicle Inspection Reports at the end of each day, implement a procedure so that its drivers can report safety defects and/or deficiencies, and establish procedures to ensure that reported safety defects and/or deficiencies are repaired before the commercial motor vehicle is operated again;
6. Ensure its drivers accurately and fully complete their daily records of duty status and submit them to the carrier within 13 days of their completion. RA Transportation must maintain drivers' records of duty status and all supporting documents for a minimum period of 6 months. Further, RA Transportation must ensure that all records of duty status are accurate by using all reasonable means available to it and by comparing each with all supporting documentation;
7. Submit to the Field Administrator a plan detailing how RA Transportation will (i) train all drivers used by RA Transportation or its successors or assigns, on compliance with the HOS regulations, (ii) monitor the compliance of all drivers used by RA Transportation or its successors or assigns with the HOS regulations, and (iii) ensure that all drivers used by RA Transportation or its successors or assigns are dispatched in such a way that scheduled routes may be completed within the maximum driving and on-duty hours, as provided in 49 CFR § 395.5;

8. Establish a DOT controlled substance and alcohol testing program in compliance with 49 C.F.R. Parts 40 (Procedures for Transportation Workplace Drug and Alcohol Testing Programs) and 382 (Controlled Substances and Alcohol Use and Testing) and provide evidence of this program to the Eastern Service Center Field Administrator;
  9. Ensure that it maintains driver qualification files, as required by 49 C.F.R. Part 391;
  10. Ensure that a three-year previous employment check is performed on all its drivers prior to their operating a commercial motor vehicle, in accordance with 49 C.F.R. § 391.23;
  11. Ensure that all its drivers are adequately trained in the requirements of the FMCSRs and that they are able to conduct motor carrier operations consistent with those regulations;
  12. Ensure that an annual list of traffic violations is obtained from each driver, an annual Motor Vehicle Record is obtained, and that an annual review is performed on each driver's driving record;
  13. Mark, in accordance with 49 CFR § 390.21, any vans or other commercial motor vehicles owned by RA Transportation or transporting passengers as part of a transportation initiated or continued by RA Transportation. This requirement applies to vehicles designed to carry 9 or more passengers, including passenger vans, owned, operated, or affiliated with RA Transportation. RA Transportation must ensure that drivers operating such vans or other commercial motor vehicles comply with the FMCSRs, including the HOS regulations;
  14. Identify a qualifying principal place of business;
- RA Transportation must send evidence of its performance of the foregoing, via certified mail, to:

Joseph P. DeLorenzo  
Director of Enforcement and Compliance  
Federal Motor Carrier Safety Administration  
1200 New Jersey Ave, SE  
Washington, DC 20590

with a copy to:

Robert W. Miller, Field Administrator  
FMCSA Eastern Service Center  
801 Cromwell Park Drive, Ste. N  
Glen Burnie, MD 21061

**FAILURE TO PRESENT EVIDENCE AS DESCRIBED ABOVE WITHIN THIRTY (30) DAYS OF SERVICE OF THIS ORDER WILL RESULT IN A DETERMINATION ADOPTING AS FINAL THE FINDINGS IN THIS ORDER, SPECIFICALLY, THAT RA TRANSPORTATION DID WILLFULLY FAIL TO COMPLY WITH APPLCIABLE REGULATIONS, FMCSA ORDERS OR CONDITIONS OF ITS REGISTRATION.**

**IN THE EVENT OF SUCH A DETERMINATION, EACH OF RA TRANSPORTATION'S FEDERAL OPERATING AUTHORITY REGISTRATION(S) WILL BE REVOKED PURSUANT TO 49 U.S.C. § 13905(e), AND RA TRANSPORTATION, AND EACH OF ITS COMPONENTS, WILL BE PROHIBITED FROM TRANSPORTING PASSENGERS FOR COMPENSATION IN INTERSTATE COMMERCE, OR OTHERWISE ENGAGING IN TRANSPORTATION SUBJECT TO THE REGISTRATION REQUIREMENTS OF 49 U.S.C. SUBTITLE IV, CHAPTER 139.**

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Joseph P. DeLorenzo  
Director of Enforcement and Compliance  
Department of Transportation  
Federal Motor Carrier Safety Administration

HQ Tracking No.:

FMCSA-MC2012-0002-TNY

**CERTIFICATE OF SERVICE**

This is to certify that on the \_\_\_\_ day of May, 2012, the undersigned mailed or delivered,  
as specified, the designated number of copies of the Order to Show Cause to \_\_\_\_\_

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By: \_\_\_\_\_