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BEFORE THE  
SURFACE TRANSPORTATION BOARD  
WASHINGTON, D.C.

ENTERED  
Office of Proceedings  
June 24, 2015  
Part of  
Public Record

STB Docket No. MCF-21064

**Prisoner Transportation Services, LLC**  
**-- Control --**  
**PTS of America, LLC and**  
**Brevard Extraditions, Inc. d/b/a US Prisoner Transport**



VERIFIED APPLICATION UNDER 49 U.S.C. §14303

KENT WOOD  
ALAN SIELBECK  
PTS OF AMERICA, LLC d/b/a PTS

And

ROBERT DOWNS  
LISA KYLE  
BREVARD EXTRADITIONS, INC.  
d/b/a US PRISONER TRANSPORT

By Their Attorneys

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Date Filed: June 23, 2015

FEE RECEIVED  
June 24, 2015  
SURFACE  
TRANSPORTATION BOARD

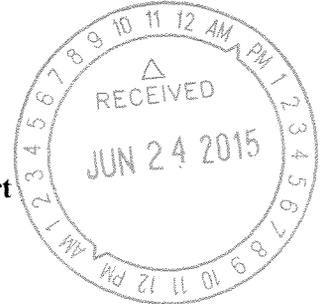
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**Prisoner Transportation Services, LLC**  
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VERIFIED APPLICATION UNDER 49 U.S.C. §14303



**I. Introduction and Summary**

Pursuant to 49 U.S.C. §14303(a)(3) and the Board’s Rules at 49 C.F.R. Part 1182.2, this Application is filed by Prisoner Transportation Services, LLC, a newly created Tennessee corporation for the purposes of acquiring common control of two motor passenger carriers regulated by the Board and by the Federal Motor Carrier Safety Administration (“FMCSA”). Those carriers are: PTS of America, LLC d/b/a PTS (“PTS”) and Brevard Extraditions, Inc. d/b/a U.S. Prisoner Transport (“USPT”).

PTS is a limited liability corporation established under the laws of the State of Tennessee. It holds authority from the FMCSA as a motor carrier of passengers in Docket No. MC-689407. Its current shareholders are Kent Wood and Alan Sielbeck, non-carrier individuals residing in Tennessee.

USPT is a Florida corporation which holds authority from the FMCSA as a motor carrier of passengers in Docket No. MC-643115. Its stock is owned 80% by Robert Downs and 20% by Lisa Kyle who are residents of Florida. PTS is headquartered at 1854 Air Lane Drive, Nashville, TN 37210. USPT is headquartered at 4150 Dow Rd., Suite 1, Melbourne, FL 32934.

Subject to Board approval which is necessary to achieve common control through the newly created parent, the owners of PTS (Kent Wood and Alan Sielbeck) and the owners of

USPT (Robert Downs and Lisa Kyle) would exchange their ownership interests in the two acquired companies for stock in the newly created parent, thereby effecting common control.

At the time of closing which the parties expect would occur on or about September 1, 2015, if the Board approval is obtained by then, Prisoner Transportation Services, LLC would acquire all of the shares of the two carriers from their respective current owners and the current owners would acquire indirect common control of those carriers through ownership of the parent company's stock.

PTS and USPT perform a genuinely specialized type of interstate transportation of passengers by motor carrier. Each carrier has separate contracts of carriage with state and local prisons, correctional facilities and sheriff's departments for the for-hire transportation of incarcerated prisoners, including convicts, parole jumpers, individuals under criminal indictment which have escaped to foreign jurisdictions, etc.

The service rendered by these companies includes recovery and extradition of prisoners from jails and detention facilities in one state and delivery to points of incarceration in interstate commerce under guard, using both air-ex and passenger motor carrier service based upon attractive contract rates. Both motor carriers operate specially equipped van and bus equipment suitable for the transportation of prisoners and comply with the Interstate Transportation of Dangerous Criminals Act ("ITDCA") with respect to the training and number of armed guards which must accompany the number of prisoners being transported at any time.

PTS and USPT, as will be explained herein, represent a small but important for-hire alternative to the more expensive yet prevalent extradition services typically rendered on a "one prisoner at a time" extradition model used by state and local officials using their own sheriffs, deputies, prison guards and publicly owned squad cars, vans or other vehicles.

As will be shown herein, the economies of scale permitted by common ownership of USPT and PTS will result, Petitioners believe, in faster and more efficient extradition of prisoners and more direct economical routings which will inure to the benefit of the state and local governments which hire applicants.

The remainder of this Application will present supporting data and argument in the sequence prescribed by the final rules adopted in STB Ex Parte No. 559, *Revisions to Regulations Governing Finance Applications Involving Motor Passenger Carriers*, 3 S.T.B. 658 (1998); see 49 C.F.R. §1182.2(a).

## **II. Facts and Circumstances**

(1) *Full identification (including addresses) and authorized signatures of all parties to the proposed transactions:*

Prisoner Transportation Services, LLC, a non-carrier, is a newly established corporation under the laws of the State of Tennessee and is headquartered at 1854 Airline Dr., Nashville, TN 37210. It has been established for the purpose of acquiring the corporate stock of PTS and USPT upon approval by the Board. The shareholders of Prisoner Transportation Services, LLC will be the current owners of PTS and USPT. Mr. Wood and Mr. Sielbeck will each own 31.5% and 38.5% of the issued common shares each and Mr. Downs and Ms. Kyle will each own 15%.

**Exhibit 1** to this Application provides executed signatures, addresses and certification (verification) pages for the two carrier Applicants' representatives (Mr. Wood, Mr. Sielbeck, Mr. Downs, Ms. Kyle.) All signatures are verified in the form required by 49 C.F.R. §1182.8.

(2) *Copies or descriptions of the pertinent operating authorities of the parties:*

Copies of the respective FMCSA operating authorities held by the two carriers are submitted as **Exhibit 2** accompanying this Application.

(3) *Description of the structure and purpose of the proposed transaction:*

This transaction will be structured as an acquisition of common control of two carriers through contribution of the outstanding stock of both to a holding company for common control and management. Although the stock purchase agreement has not yet been executed as of the date of this Application, drafting and negotiation of these documents is at an advanced stage, and letters of intent have been signed by the parties to each of the transactions. The parties anticipate that the documents will be executed within a month of filing.

The purpose of this Acquisition is for Prisoner Transportation Services, LLC to acquire 100% of the control of PTS through acquisition of the stocks from Mr. Wood and Mr. Sielbeck and 100% of the stock of USPT by acquisition of its stock from Mr. Downs and Ms. Kyle. As a result of this proposed tax free stock swap, the current owners of each company would jointly be in common control of both carriers.

The acquisition of the two carriers for common control and management would allow both companies to continue to serve and expand their existing customer base in a more economic, efficient and as described herein, joint line and consolidated operations which would eliminate dead head, result in reduced transit time and costs, and offer a more viable and effective alternative to the maintenance of more expensive extradition alternatives which currently burden state and local governments.

The acquisition would put applicants in control of two comparatively small yet well run and profitable passenger carriers which specialize in the transportation of prisoners and other detainees being transported under guard in interstate commerce from one place of incarceration to another under authority of state correction officials or lawful extradition orders issued by state and local officials.

Although both of the involved carriers hold out to provide broad extradition services for individual prisoners under contracts with state and local authorities, their respective services are complementary. One of the commonly managed businesses would be domiciled in Tennessee and one in Florida, and the strong existing management groups of each carrier would remain involved in the business after acquisition with the management team and investors of both companies remaining involved in the day-to-day operations. Their efforts would be enhanced with greater access to capital, lower costs of operation and insurance costs, and better ability to control costs through consolidation of line haul and pickup and delivery services as explained herein.

The officers and directors of Prisoner Transportation Services, LLC would be Robert Downs, President; Lisa Kyle, Vice President; Alan Sielbeck, Chairman; and Kent Wood, Secretary, all of whom are current shareholders. Their biographies are attached as **Exhibit 3** to the Application.

*(4) Identification and description of carriers currently affiliated with Applicants; a brief description of their operations; description of current corporate structure:*

Under 49 C.F.R. §1182.2(a)(4), Applicants are required to describe the “intercorporate structure” of their corporate family “from top to bottom.” In response to this requirement, Applicants reiterate that upon STB approval, both PTS and USPT will become wholly operating subsidiaries of Prisoner Transportation Services, LLC, a Tennessee corporation, with the current owners of PTS (Mr. Wood and Mr. Sielbeck) owning 31.5% and 38.5% of the outstanding corporate stock of the holding company and the current owners of USPT (Mr. Downs and Ms. Kyle) owning 24% and 6% of the holding company’s stock respectively.

As noted earlier, the existing operations of PTS and USPT are domiciled at Nashville, Tennessee and Melbourne, Florida respectively and are engaged in similar operations and provide customized service in interstate transportation of passengers for hire. In compliance with the ITDCA, each carrier provides specially designed vehicles with qualified drivers and armed guards for interstate transportation of prisoners and other individuals being detained under state and local warrant for extradition at the direction of state and local law enforcement officials with whom they contract.

PTS currently operates 20 vehicles including 2 thirty passenger buses; 6 specially designed transporters suitable for the transportation of as many as 20 inmates and 4 guards; and 12 fifteen passenger vans suitable for the transportation of up to 12 inmates and up to 3 qualified drivers or guards.

PTS currently has contracts or relationships with approximately 600 government agencies including state corrections departments, county sheriffs and local counties to transport prisoners or detainees being extradited from one prison or jail in one state to another state pursuant to lawful court process.

USPT offers a similar ITDCA service, operating 12 vehicles including 2 transporters and 10 passenger vans. It has contracts with approximately 240 governmental entities for the extradition of prisoners and detainees on an as-needed basis in interstate commerce.

Pictures of uniquely configured vehicles used by Applicants are attached as **Exhibit 4**.

Method of Operation. The motor carrier interstate passenger services offered by PTS and USPT are contractually determined and predicated on a price per mile per detainee basis. Applicants' operating model is distinctly different from the extradition methods typically employed by federal, state and local officials. Typically, the federal marshal service or state and local officials must send one or more correctional officer in a patrol car or other suitable

government owned vehicle over to recover and return each detainee, a costly and time consuming measure.

PTS and USPT, within the time constraints for extradition established by state and local government, can design irregular route pickup and delivery of multiple detainees with one vehicle, economically transporting as many as 12 prisoners with 2 guards. (Using its 2 passenger buses, Applicant, by using 4 guards, can consolidate and transport as many as 24 detainees in transcontinental recovery at a time.)

Both PTS' and USPT's services are arranged in strict compliance with U.S. DOT hours of service and each passenger carrier has arrangements with jails located throughout the continental U.S. where detainees and prisoners are housed in transit.

Economies of scale to be discussed in greater detail in support of this common control application are now achieved by each carrier by coordinating pickups and deliveries of their fleets and transferring detainees at centrally located jails to reduce transmit times and deadhead miles.

(5) *Jurisdictional Statement:*

Under 49 U.S.C. §14303(a)(4), prior Board approval is required for “acquisition of control of at least 2 (FMCSA-regulated motor passenger) carriers by a person that is not a carrier.” This requirement applies here because the Applicants seek to acquire indirect management and stock control of PTS and USPT, each of which holds FMCSA authority as a motor carrier of passengers, through a newly established holding company, Prisoner Transportation Services, LLC.

The “small transaction” exemption of §14303(g) does not apply here. That exemption applies only if the “aggregate gross operating revenues” of all of the involved carriers “were not

more than \$2,000,000 during a period of 12 consecutive months ending not more than 6 months before the date of the agreement of the parties”; *Id.* Under 49 C.F.R. §1182.2(a)(5), this calculation must include revenues derived from “all transportation sources” whether regulated or not. It is hereby certified that the aggregate gross operating revenues of the Two Carriers did exceed \$2 million for the twelve months ending on any date prior to the filing of this Application or prospectively at any date through the first two quarters of 2015 regardless of which date turns out to be the date of execution.

(6) *Statement as to environmental and energy-conservation impacts:*

As shown in the following section, the combined operations of the two Applicants would result in less miles traveled and high passenger per mile rates which would reduce fuel consumption thus enhancing energy conservation. It would also reduce traffic and the hours law enforcement personnel spend transporting prisoners freeing said personnel for more productive law enforcement duties. Therefore the approval of this application will not significantly affect the quality of the human environment and conserve energy resources.

(7) *Information to demonstrate that the proposed transaction is consistent with the public interest:*

Discussion under this heading will begin by addressing the three specific approval criteria set forth in 49 U.S.C. §14303(b), *i.e.*, the effect of the proposed Acquisition on the adequacy of transportation service to the public; the total fixed charges resulting from that transaction; and the interests of affected carrier employees. The ensuing discussion will focus on a public-interest factor which Applicants submit is at least equally important, *i.e.*, the minimal impact of the proposed transaction on competition in any passenger service sector.

(a) Adequacy of Transportation Services. Applicants submit that approval and consummation of the proposed Acquisition would have no significant impact on the adequacy of transportation services to the public. By combining the pickup and delivery schedules of both companies, detainees scheduled for pickup can be booked more expeditiously on the nearest available bus or transporter, regardless if the vehicle is operated by PTS or USPT.

PTS currently transports an average of 275 prisoners per week and USPT transports approximately 110 prisoners per week. Each carrier operates a mini hub operation, not unlike commercial airlines. Routes are planned so that prisoners confined overnight at participating jails may be reconsolidated the next day and transferred for delivery on other vehicles for delivery to the same or nearby correctional facilities.

For example, PTS makes extensive use of the Christian County, Kentucky Jail where it has a contract to house and feed as many as 100 prisoners per night in transit. Prisoners being extradited pursuant to PTS' contract with the State of Michigan may be picked up by PTS' equipment operating west and south of Michigan brought to Christian County and, after an overnight stay, be reloaded onto a transporter or bus for delivery to Michigan area jails and prisons without the necessity of multiple vehicles traversing the last 500 miles.

PTS and USPT have contracts with different state and local jails but each offers a nationwide footprint with respect to the pickup and extradition of prisoners for the state and local authorities they serve. As stated above, PTS operates only 20 vehicles and USPT operates 12, a small number to effectively offer nationwide coverage.

The comparative analysis provided in Exhibit 5 and 6 offer an example of the savings in fuel cost and transit time which is permitted by consolidated operations. **Exhibit 5** shows the total combined mileage run by the two companies separately is 12,506. **Exhibit 6** shows the miles run if the two companies' operations are consolidated. The same number of pickups and

deliveries would be made and by consolidating the passengers at Nashville, the miles run would be reduced to 6,708, a combined savings of 5,798 miles or 1,449 miles per prisoner. This type of consolidation which could result from common control would result in more efficient and timely transportation with reduced fuel costs.

In this regard, it is to be noted that the benefits of consolidation, which common control would remit, result in more efficient and timely transportation with reduced fuel consumption and less denigration of the economy. These more efficient combined services can be provided while maintaining the chain of custody requirements for detainees under the ITDCA. From time of pickup to time of delivery, each detainee will be either in an approved governmental confinement facility or under constant monitoring during transit by private guards retained by Applicants.

The competitive effect of the proposed merger on competitors will be discussed herein, but it is important that the STB recognize that the proposed common control has only a “drop in the bucket” effect on the size and scope of the number of prisoner extraditions which are performed in interstate commerce during any year. The U.S. Marshal Service, for example, at public expense, typically retrieves 280,000 detainees per year.

As shown above, Applicants believe they could enhance the operation of the two carriers by implementing vehicle sharing arrangements to ensure maximum use and efficient operation of equipment; by providing coordinated driver training and safety management and load sharing arrangements through interlining of detainees at points of common service by centralizing various management support functions including jail housing arrangements at Christian County, Kentucky and other points as well as by centralizing various management support functions including vehicle licensing, legal affairs, accounting, human resources, purchasing and environmental compliance. The Board has recognized such factors as positive evidence with

regard to the “service adequacy test,” for motor passenger carriers under §14303(b). See e.g., STB Docket No. MC-F-20924, *Global Passenger Services, L.L.C. – Control – Bortner Bus Company et al.* (served July 17, 1998) (“*Bortner*”), slip op. at 5.

(b) Fixed Charges. Applicants also believe that their control of the two carriers would generate economies of scale as set forth above, which would reduce the variety of unit costs now being incurred to operate these carriers under separate ownership. The irregular route pickup and delivery in route services both Applicants currently provide have inherent operating efficiencies over a single one-by-one detainee retrieval system otherwise employed by a majority of correctional facilities and jails at a local, state and federal level. Yet both Applicants have contracts which hold out to provide a virtual nationwide retrieval service for state and local governments which limits the efficiency of each operation to consolidate pickups and deliveries given the 10 days to retrieve pickup requirements established by contract. Access of both Applicants to all available detainees for assignment by interline on the nearest available unit would enhanced Applicants’ service offering by allowing the recovery and delivery of detainees more efficiently and promptly.

The combined operations, consisting of 32 vehicles of various size – while hardly overwhelming, would vastly improve Applicants’ combined recovery system while giving the combined program access to financing more favorable than they currently enjoy. In addition to better interest rates, a traditional meaning of “fixed charges,” the combined carriers should be able modestly to enhance their volume purchasing power, thereby reducing insurance premiums and achieving deeper volume discounts for equipment and fuel. See *Bortner*, supra, slip op. at 5.

(c) Employee Interests. Applicants consider it reasonable to expect that the economies and efficiencies they would bring to the two carriers, as discussed above, would directly benefit the employees by maintaining job security and retaining or expanding the

volume of available work. Consistent with the hours of service requirements of the FMCSA and the prisoner/guard requirements imposed by the ITDCA, depending upon the number of detainees transported at any one time and the use, on occasion, of sleeper berth operations, as many as 4 employees may be required for a single vehicle. All guards and driver employees are housed at motels during mandatory rest breaks while detainees are incarcerated at local jails. Employees may be away from home base for 7 or 8 days.

By combining operations and achieving the proposed economies of scale, Applicants believe that greater opportunity will exist to schedule shorter tours of duty for employees resulting in more home time. For those reasons, Applicants believe the proposed acquisition of these carriers would have only a positive impact on employee interests.

(d) Competition and the Public Interest. As will be seen, approval of the instant Application would be unlikely to exert any negative anticompetitive impact on any portion of the passenger transportation industry. This is true for several very fundamental reasons:

(1) Prisoner extradition services are a unique segment of the marketplace. Unlike traditional regularly scheduled bus service or special and charter operations, the for-hire segment which applies to Applicants' unique services is atypical and involves special economic and competitive factors.

(A) The vast majority of prisoners and detainees which are transported in interstate commerce, whether by air or ground, are transported by U.S. Marshals, state law enforcement officers, sheriffs, deputies, or local police officers. All told, the combined operation of Applicants would transport 18,200 prisoners and detainees per year, less than 5% of the population being transported.

(B) Applicants of existing competitors whose ability to compete would not be adversely affected. Prisoner extradition services are provided based upon open

competition among qualified service providers for contracts of 1 to 3 years in duration. Currently there are approximately 100 such contracts let per year.

(2) Existing Competitors. To Applicants' knowledge there are numerous existing licensed, authorized and insured for-hire interstate passenger carriers which compete with Applicants that are scattered throughout the country and include: Transcor, STS, US Corrections, Texas Prisoner Transport, GEO Transport, US Marshall's Service, Lock and Load, G4S, and Global Prisoner Services

The granting of this Application will not affect the ability of these existing competitors to bid with Applicants for these contracts in the free, competitive bidding process. In any event, all extradition services are up for grabs at the end of each contract term. The business is open for free competition, not only by other for-hire carriers but by the customers themselves – the governmental bodies that have the ever-present ability to resume direct operations and their transit of detainees if the anticipated benefits of “outsourcing does not pan out.”

3. The Emerging Market Analysis. The law allows the FMCSA to limit entry into charter or special operations only if the entrant is a public agency. See 49 U.S.C. §13902(b)(2). Clearly, the extradition of detainees utilizing qualified third party providers such as Applicants can and should be seen as a public/private partnership which utilizes qualified carriers such as Applicants to perform an economic and consolidation service which cannot be rendered efficiently if every state and local jurisdiction is otherwise left to continue to route detainees on a one-by-one basis.

In the absence of entry barriers, there is nothing to preclude existing carriers from expanding their routes, rates and services, nor to keep well capitalized new entrants from entering this emerging new market at any time. In this context, Applicants submit that the National Transportation Policy supports granting this Application. 49 U.S.C. §13101(a)(2)

which applies to the transportation of passengers as well as property, provides that in overseeing transportation by motor carriers, the Secretary should promote competitive and efficient transportation *inter alia* in order to (1) promote efficiency in the motor carrier transportation system (which the combined operations of Applicants would accomplish); (2) meet the needs of “passengers” which the more expeditious rendition of detainees would accomplish; (3) allow a variety and quality of price options to meet changing demands (which enhanced consolidation operations would permit); (4) allow the most productive use of equipment and energy resources (which combined operations would allow); (5) enable efficient and well managed carriers to attract capital and maintain fair wages and working conditions (see §7(b) above); (6) provide and maintain service to small communities (which for-hire service to county jails permits); (7) provide and maintain competitively privately owned motor carrier system (which the common control of Applicants allows).

In the unique market segment in which Applicants compete, the efficiencies which result from the common control they seek would clearly be consistent with the National Transportation Policy and enhance their ability to attract additional business in their primary service area, but they are certainly not dominant market players in the larger marketplace for the for-hire transportation of passengers.

The combined annual revenue of both carriers is \$14 million, and the common control which the Application seeks would simply allow two small businesses to join forces through common ownership by a stock swap among 4 owners. Indeed, the combined revenue of approximately \$14 million for 2014 amounts to far less than 1% of the bus transportation’s annual revenue – estimated by Applicants to be around \$5 billion per year.

Finally, the Board’s competitive analysis here should not be limited to participation in the bus transportation industry since the extradition of passengers is so heavily dominated by the use

of state and locally owned prisoner compatible patrol cars and vans. See *GLI Acquisition Co. – Purchase – Trailways Lines, Inc.*, 4 I.C.C. 2d 591, 598-602 (1988) (discussing and broadly defining relevant market for passenger transportation services).

(8) *Certification of the U.S. Department of Transportation safety fitness rating of each motor carrier involved in the application, whether that carrier is a party to the transaction or is affiliated with a party to the transaction:*

It is hereby certified that Applicant PTS – MC689407 has a safety rating of “Satisfactory” according to the FMCSA. USPT is Conditional. As noted earlier, no other affiliate of Applicants is subject to regulation by FMCSA or the Board.

(9) *Certification by the parties acquiring operating rights through the transaction that they have sufficient insurance coverage under 49 U.S.C. §§ 13906(a) and (d) for the services they intend to provide:*

Applicants certify that appropriate insurance is in place.

(10) *Statement as to Mexican domicile, ownership or control:*

No party that would acquire or control operating rights through the transactions encompassed by this Application is either domiciled in Mexico or owned or controlled by persons of that country.

(11) *Certification under 21 U.S.C. §853a by any individual transferee of operating rights:*

Inapplicable, as none of the involved FMCSA authorities has been or would be transferred to an individual in connection with any transaction encompassed by this Application.

### III. Conclusion and Prayer for Relief

For all the reasons stated in this Application, the undersigned parties hereby request the Board to grant approval for Applicant Corporation to acquire the stock of the Two Carriers described herein.

Respectfully submitted,

KENT WOOD  
ALAN SIELBECK  
PTS OF AMERICA, LLC d/b/a PTS

And

ROBERT DOWNS  
LISA KYLE  
BREVARD EXTRADITIONS, INC.  
d/b/a US PRISONER TRANSPORT

By Their Attorneys



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Filed: June 23, 2015

#### Exhibits:

- 1 Signature and Certification Pages
- 2 FMCSA Operating Authorities
- 3 Biographies of Robert Downs, President; Alan Sielbeck, Chairman;  
and Kent Wood, Secretary
- 4 Pictures of Vehicles
- 5 Analysis of Operations Conducted Separately
- 6 Analysis of Combined Operations

CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of this Application, including all Exhibits, to be served this date upon each of the following:

**Via Federal Express**

Chief, Section of Administration  
Surface Transportation Board  
395 E Street, SW  
Washington, DC 20423-0001  
Tel: 202-245-0350

**Via U.S. Mail/Postage Prepaid**

Chief, Licensing & Insurance Division  
U.S. Department of Transportation  
Office of Motor Carriers-HIA 30  
400 Virginia Ave., S.W., Ste. 600  
Washington, DC 20004

Dated this 23rd day of June, 2015.



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Vienna, VA 22182  
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Fax: 703-573-9786  
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# **EXHIBIT 1**

## **Signature and Certification Pages**

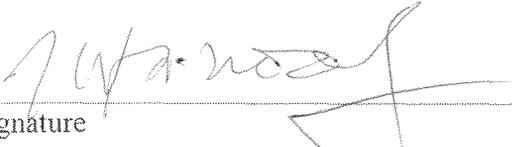
SIGNATURE AND CERTIFICATION  
(PTS of America, LLC d/b/a PTS)

Kent Wood  
PTS of America, LLC d/b/a PTS  
1854 Air Lane Drive  
Nashville, TN 37210

SIGNATURE AND CERTIFICATION

I, Kent Wood [name] Secretary [title],

verify under penalty of perjury, under the laws of the United States of America, that all information supplied in connection with this application 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.

  
Signature

6-22-15  
Date

SIGNATURE AND CERTIFICATION  
(PTS of America, LLC d/b/a PTS)

Alan Sielbeck  
PTS of America, LLC d/b/a PTS  
1854 Air Lane Drive  
Nashville, TN 37210

SIGNATURE AND CERTIFICATION

I, Alan Sielbeck [name] Chairman [title].

verify under penalty of perjury, under the laws of the United States of America, that all information supplied in connection with this application 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.



\_\_\_\_\_  
Signature

June 8, 2015

\_\_\_\_\_  
Date

SIGNATURE AND CERTIFICATION  
(Brevard Extraditions, Inc. d/b/a U S Prisoner Transport)

Robert Downs  
Brevard Extraditions, Inc.  
d/b/a U S Prisoner Transport  
4150 Dow Rd., Suite 1  
Melbourne, FL 32934

SIGNATURE AND CERTIFICATION

I, ROBERT DOWNS [name] PRESIDENT / COO [title],  
verify under penalty of perjury, under the laws of the United States of America, that all  
information supplied in connection with this application 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.

R Downs  
Signature

6/8/15  
Date

SIGNATURE AND CERTIFICATION  
(Brevard Extraditions, Inc. d/b/a U S Prisoner Transport)

Lisa Kyle  
Brevard Extraditions, Inc.  
d/b/a U S Prisoner Transport  
4150 Dow Rd., Suite 1  
Melbourne, FL 32934

SIGNATURE AND CERTIFICATION

I, Lisa Kyle [name] Vice President [title],

verify under penalty of perjury, under the laws of the United States of America, that all information supplied in connection with this application 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.

  
Signature

6-8-15  
Date

**EXHIBIT 2**



U.S. Department of Transportation  
Federal Motor Carrier Safety Administration

1200 New Jersey Ave., S.E.  
Washington, DC 20590

**SERVICE DATE**  
April 23, 2010

**CERTIFICATE**

**MC-689407-C**  
PTS OF AMERICA LLC  
D/B/A PTS  
NASHVILLE, TN

This Certificate is evidence of the carrier's authority to engage in transportation as a **common carrier of passengers, in charter and special operations**, by motor vehicle in interstate or foreign commerce.

This authority will be effective as long as the carrier maintains compliance with the requirements pertaining to insurance coverage for the protection of the public (49 CFR 387); the designation of agents upon whom process may be served (49 CFR 366); and schedules (49 CFR 374.305). The carrier shall also render reasonably continuous and adequate service to the public. Failure to maintain compliance will constitute sufficient grounds for revocation of this authority.

Jeffrey L. Secrist, Chief  
Information Technology Operations Division

**NOTE:** Applicant is a nonrecipient of governmental financial assistance.

**NOTE:** Willful and persistent noncompliance with applicable safety fitness regulations as evidenced by a DOT safety fitness rating of "Unsatisfactory" or by other indicators, could result in a proceeding requiring the holder of this certificate or permit to show cause why this authority should not be suspended or revoked.

CPN



U.S. Department of Transportation  
Federal Motor Carrier Safety Administration

1200 New Jersey Ave., S.E.  
Washington, DC 20590

SERVICE DATE  
April 28, 2010

CERTIFICATE

MC-643115-C

BREVARD EXTRADITIONS INC  
D/B/A U S PRISONER TRANSPORT  
PALM BAY, FL

This Certificate is evidence of the carrier's authority to engage in transportation as a **common carrier of passengers, in charter and special operations**, by motor vehicle in interstate or foreign commerce.

This authority will be effective as long as the carrier maintains compliance with the requirements pertaining to insurance coverage for the protection of the public (49 CFR 387); the designation of agents upon whom process may be served (49 CFR 366); and schedules (49 CFR 374.305). The carrier shall also render reasonably continuous and adequate service to the public. Failure to maintain compliance will constitute sufficient grounds for revocation of this authority.

A handwritten signature in black ink, appearing to read "Jeffrey L. Secrist".

Jeffrey L. Secrist, Chief  
Information Technology Operations Division

**NOTE:** Applicant is a nonrecipient of governmental financial assistance.

**NOTE:** Willful and persistent noncompliance with applicable safety fitness regulations as evidenced by a DOT safety fitness rating of "Unsatisfactory" or by other indicators, could result in a proceeding requiring the holder of this certificate or permit to show cause why this authority should not be suspended or revoked.

CPN

**EXHIBIT 3**

**Kent D. Wood**

- B.S. Finance, McIntire School of Commerce, University of Virginia.
- MBA, Owen Graduate School of Management, Vanderbilt University
- Co-Founder, PTS of America, LLC, ImageQuest, LLC, CBx Law, LLC
- Nashville City Paper Entrepreneur of the Year
- Nashville Business Journal “40 Under 40”
- Certified Public Accountant
- TN State Chair Young Presidents’ Organization
- Alumni Council Vanderbilt’s Owen Graduate School of Management
- Rocketown Board of Directors
- West End Community Church

Alan Sielbeck  
6543 Murray Lane  
Brentwood, TN 37027

Education:

BS in Business Murray State University 1974  
Certified Public Accountant (Illinois and Tennessee)

Work History:

Tom Smith & Associates  
Certified Public Accountants  
Nashville, TN 1974-1976

The Mathews Company  
Real Estate Development  
Chief Financial Officer  
Nashville, TN 1976-1990

AC Service /  
Service Experts (NYSE: SVE)  
Heating and Air Conditioning service companies (IPO 1996)  
Chairman and Chief Executive Officer  
1990-2000

PTS, LLC  
Private Prisoner Transportation  
Nashville, TN  
Managing Member  
2001 - Present

Mr. Sielbeck has been active in the acquisition and management of multiple service related businesses. In addition to prisoner transportation, he has acquired and managed ambulance services, heating and air conditioning services, medical waste services, information technology and print management companies, and legal staffing services.

# Robert Downs

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4150 Dow Rd Suite 1, Melbourne, FL  
321-725-5570

## Experience

### US Prisoner Transport

2006 - Present

### President /Chief Operations Officer

- Responsible for the daily operations and management.
- Work closely with clients to provide safe, secure, timely and professional extraditions.
- Provide a secure and stable place of employment for an average of 40 employees.

### US Extraditions

2004 - 2006

### Vice President /Owner

- Responsible for the daily operations including but not limited to customer development, transportation management, employee scheduling, human resource, training, fleet maintenance.
- Dissolved partnership

### Mid Florida Security Group

2001 -2004

### Logistics Manger

- Transportation logistics assignments to include scheduling and planning routes and trips for extraditions, and contacting various law enforcement and corrections agencies across the U.S. to obtain new accounts

## Education:

- Law Enforcement Academy, Indian River Community College, FL 2001

# Lisa Kyle

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4150 Dow Rd Suite 1, Melbourne, FL  
321-725-5570

## Experience

### US Prisoner Transport

2006 - Present

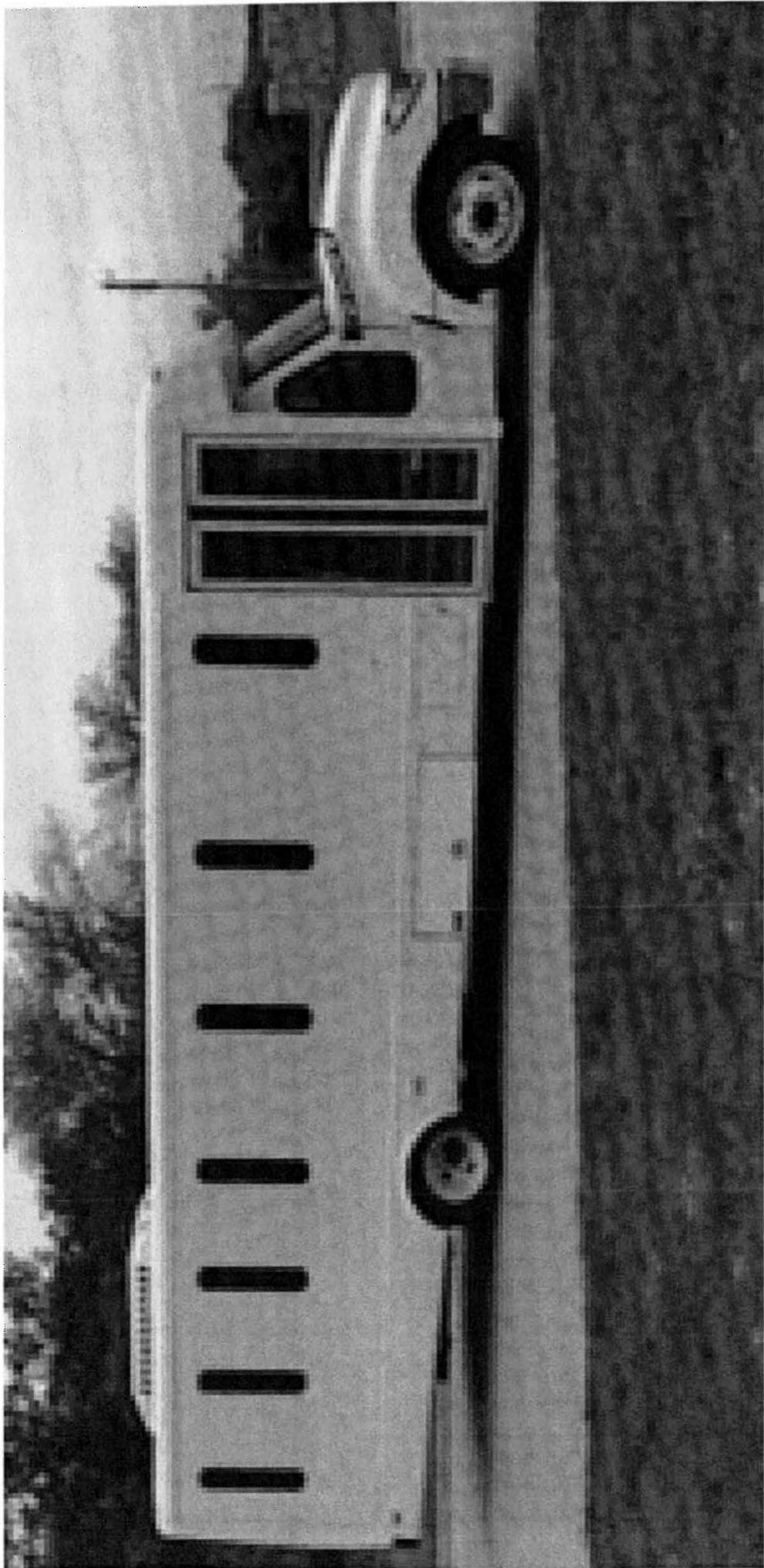
### Vice President /Chief Financial Operator

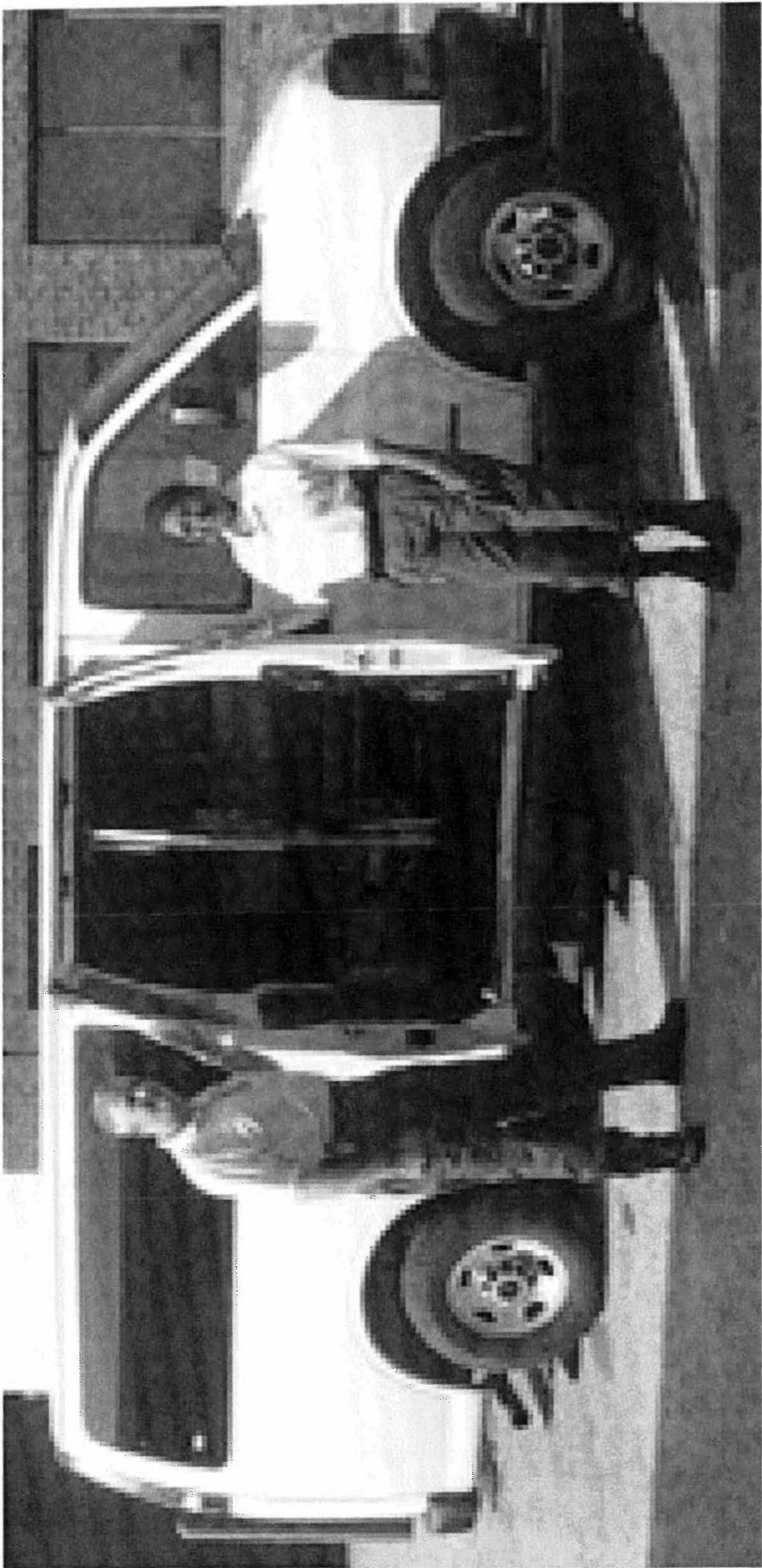
- Responsible for the daily financial operations
- DOT Drug Consortium Management
- Accounts Payable/Receivable
- Contract Renewals
- Employee Time Tracking/Payroll
- Maintain Driver List for USDOT
- Maintain Licensing for State, County, and USDOT

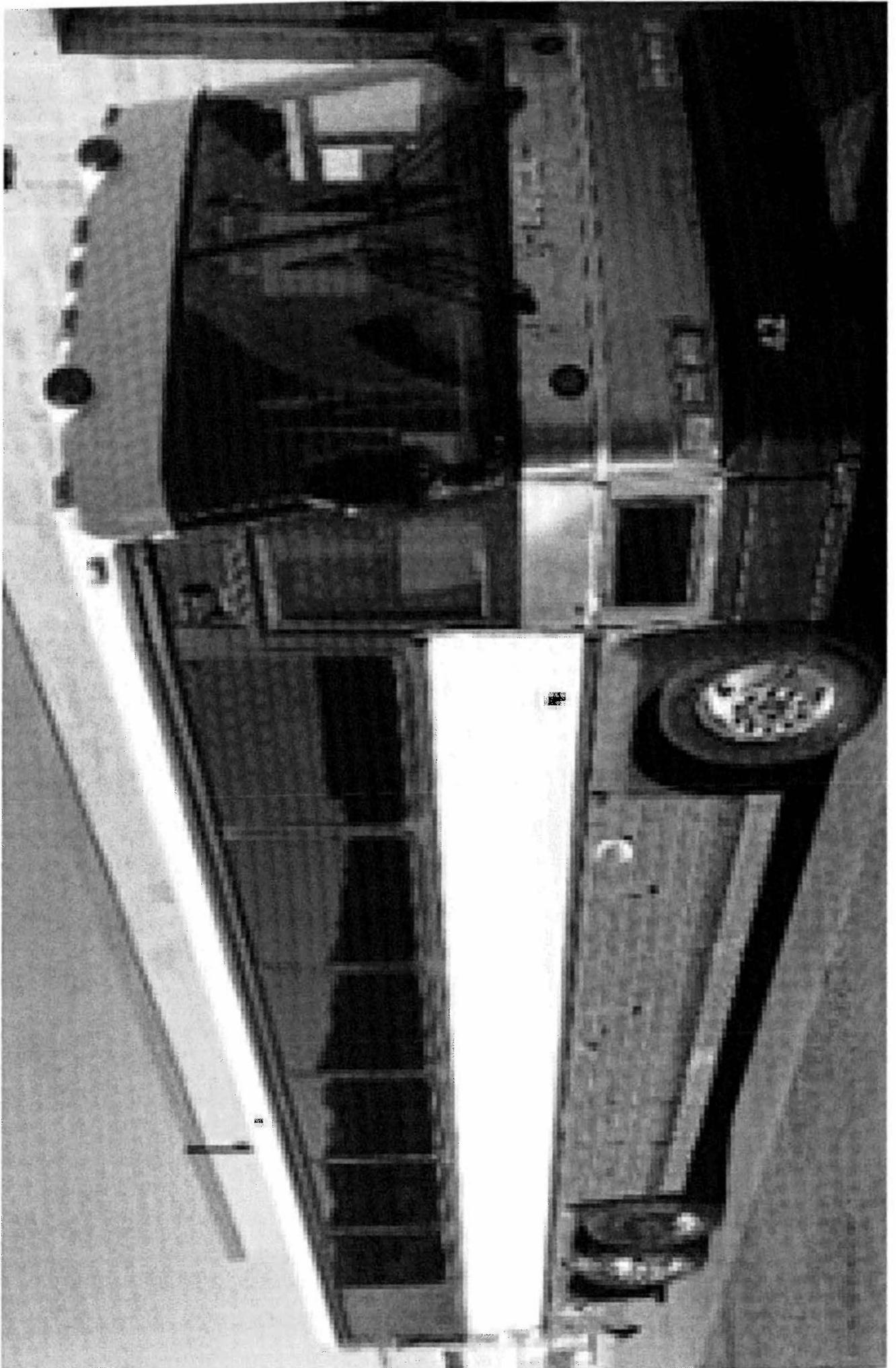
## Education:

- Associates of Arts, General Education, Brevard Community College, 2005.
- University of Central Florida, Chemistry, 2006
- Florida Licensed Real Estate Associate

**EXHIBIT 4**







## EXHIBIT 5

PTS	MILES	PU/DO
NASHVILLE, TN-WOODLAND, CA	2287	REST
WOODLAND, CA P/U	0	1
LOS ANGELES, CA P/U	401	1
FORT SMITH, AR	1508	REST
FORT SMITH, AR	0	REST
CANTON, GA	692	-1
ORLANDO, FL	484	-1
NASHVILLE, TN	693	
TOTAL MILES DRIVEN	6064	

USPTS	MILES	PU/DO
MELBOURNE, FL-TUCSON, AZ	2097	REST
RICHMOND, CA P/U	865	1
VENTURA, CA P/U	392	1
PHOENIX, AZ	444	REST
DECATUR, GA D/O	1878	-1
DECATUR, GA	0	REST
FORT MYERS, FL	583	-1
FORT MYERS, FL-MELBOURNE, FL	180	0
TOTAL MILES DRIVEN	6442	

TOTAL MILES	12,506
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## EXHIBIT 6

PTS/USPTS COMBINED	MILES	
NASHVILLE, TN-WOODLAND, CA	2287	REST
WOODLAND, CA P/U	0	1
RICHMOND, CA P/U	67	1
VENTURA, CA P/U	368	1
LOS ANGELES, CA P/U	67	1
LOS ANGELES, CA-NASHVILLE, TN	2003	-4
TOTAL MILES DRIVEN	4792	

PTS/USPTS COMBINED	MILES	
MELBOURNE, FL-NASHVILLE, TN	757	4
CANTON, GA D/O	286	-1
DECATUR, GA D/O	33	-1
FORT MYERS, FL D/O	583	-1
ORLANDO, FL D/O	194	-1
MELBOURNE, FL	61	0
TOTAL MILES DRIVEN	1916	

TOTAL MILES RUN COMBINED	6,708
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COMBINED TOTAL MILES SAVED	5,798
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