



August 2, 2016

Brad Weber
Gray Line Worldwide
1835 Gaylord Street
Denver, CO 80206

C

Re: Transfer of Control of GrayLine New York Tours, Inc.

Dear Brad:

Please find enclosed the application for approval of the transfer of control of GrayLine New York Tours, Inc. ("GLNY"). GLNY is a wholly owned subsidiary of Twin America, LLC ("Twin America"); we hereby provide the requested information of, and concerning Twin America. As we discussed previously, we are submitting this application although we do not believe a transfer of control has occurred.

In this regard, a transfer of control only occurs if there is a transfer of control in the Owner (GLNY) or its (then) parent company (International Bus Services, Inc. ("IBS")). No such transfer of control has occurred in this instance. With respect to the specific facts applicable here, GLNY at the time of the License issuance, was owned solely by IBS. Therefore, it was controlled by IBS. Today, is no different. Presently, IBS is a 60% equity owner of Twin America, and Twin America owns 100% of GLNY. Accordingly, there has been no transfer of control as defined in the License Agreement; IBS still maintains more than a 50% equity interest in the ownership of GLNY.

Notwithstanding, for the sake of cooperation and moving forward in the manner desired by Gray Line, we are herewith submitting the application. We have also enclosed the application fee of \$7,500.00.

Thank you for your attention to this.

Very truly yours,

Twin America, LLC

By:


Zev Marmurstein

/Enclosure