

Date: March 7, 2023
To: Interested Parties
From: BusPatrol America LLC
Re: Response to Inaccurate Statements on Maryland House Bill 849

On February 23, 2023, Maryland Delegate David Moon, speaking at an Environment and Transportation Committee hearing on House Bill 849 regarding the enforcement of school bus stop violations, made demonstrably false statements and accusations of wrongdoing directed at BusPatrol America LLC (“BusPatrol”).

In his public comments, Delegate Moon stated that BusPatrol, a respected school bus safety provider that serves Montgomery County’s flagship school bus automated photo enforcement program, was "convicted of bribery in another state" and “flagged by a DLS audit that Montgomery County’s procurement was flawed, and no bid, and didn’t have proper controls...”

These inaccurate statements warrant a formal response and BusPatrol would like to set the record straight.

THE FACTS

Over seven years ago, BusPatrol, in a competitive process, purchased intellectual property stemming from a now-defunct company (Force Multiplier Solutions, or “FMS”) that developed nascent school bus stop arm enforcement technology. That defunct company unfortunately had certain individuals in corporate leadership who violated the law. **None** of those individuals work for or are even associated with BusPatrol. We strongly condemn the actions of these individuals as they are not representative of anyone at our company or our mission to protect students on their journey to and from school.

A third-party review has corroborated that the acquisition occurred only after the actions occurred and all relevant parties were brought to justice. This issue has been reviewed by dozens of investors and more than 40 new customers since that time, including a separate audit by Montgomery County. We take pride in the integrity of our service and mission to make the roads safer for students around school buses.

As part of this purchase, BusPatrol acquired some technology and operations employees from FMS, although these employees make up a minimal fraction of the company. No one on the current board or executive team has any links to FMS, in fact, the current Chief Executive Officer of the BusPatrol did not join the company until well after the initial FMS asset purchase. BusPatrol is therefore completely unrelated to FMS aside from its initial acquisition, which is a well-established practice for investors looking to professionalize and expand within a market.

BusPatrol has not ever been convicted of bribery in another state and any statement to the contrary is false. BusPatrol’s Montgomery County program has not been flagged by a DLS audit and was awarded with proper controls in place. There are numerous sources corroborating these facts, which are provided below.

BusPatrol prides itself on its commitment to ethics and compliance with all applicable laws and regulations. Our program is the most awarded in the country because of our record of excellence and high standards for performance. Delegate Moon's comments are not only false, but show a complete disregard for the truth, which is that BusPatrol is a trusted, experienced, and highly principled company working tirelessly to ensure the safety of all school children on their journey to and from school.

CORROBORATION OF FACTS

- Letter from Lead Attorney, Dallas, 2016 - [Attached]
- Letter from Montgomery County, 2020 – [Attached]
- Montgomery County Audit 2019 - [Link Below]
https://www.montgomerycountymd.gov/exec/Resources/Files/audit/BusPatrol_Report_M_PIA_12-2019.pdf

ADDITIONAL FACTS AND PROTOCOL

- Karoon Monfared, the current CEO of BusPatrol, has been with the business for just 2.5 years, joining the company well after the acquisition of the FMS assets. The prior CEO, Jean Souliere, acquired the assets and was never an employee at FMS or otherwise related to FMS in any way.
- As a safety technology provider, BusPatrol creates evidence based on our customers' evidence building requirements, not our own. Our customers - through police officer or certified technician approvals or dismissals - are the ultimate decision makers for a violation having occurred or not. This is never BusPatrol's role.
- BusPatrol follows a strict set of compliance practices and regularly carries out internal training on ethics and compliance. Every employee is required to complete a comprehensive Compliance and Ethics Program to ensure he/she knows their contractual and ethical obligations and that they must adhere to and understand company policies such as the avoidance of any conflicts of interest, comply with company anti-bribery and anti-corruption protocols, reporting of any suspected wrongdoing, and compliance with all laws governing lobbying activities in states where the company does business. These trainings are required not only when an employee joins the company, but on an ongoing basis.
- BusPatrol prioritizes regulatory compliance. Our hardware, software, and processes were built in accordance with regulations, standards, and recommended guidelines from the federal government, the state governments of the numerous states in which we operate, and the pupil transportation industry. Examples of such compliance include going through an approval process to ensure our equipment is certified by the Pennsylvania Department of Transportation, meeting FCC device certification standards to activate cellular modules on carrier networks, and complying with annual school bus inspections in Maryland.
- BusPatrol's proposed solution complies with the following federal, state, local and SAE regulations and standards, including:
 - All requirements of MD Transportation Code Section 21-706.
 - All known Federal requirements under Title 49 CFR Part 571. The Federal Motor Vehicle Safety Standards (FMVSS), as well as the National Congress on School Transportation (NCST) specifications

- Service Organization Control (SOC) 2 compliance requirements and auditing processes for third-party service providers to securely manage data and protect the interests and privacy of their clients.

FULL-FLEET SAFETY SOLUTION FOR ALL STUDENTS

- BusPatrol is by-far the top and most experienced provider of school bus stop arm enforcement safety services across the United States. We serve hundreds of school districts and our technology is deployed across a growing fleet of almost 20,000 yellow school buses.
- Our equity-first mission is truly unique in this vendor community space. We provide no-cost full-fleet deployments of our camera systems. Unlike our competitors, we do not charge communities for systems, nor do we pick and choose school buses and routes based on profit. In line with our mission, we believe all children deserve a safer ride to and from school.
- While other vendors in this space claim to offer a full-fleet solution, no other vendor has successfully deployed full-fleet school bus safety programs. BusPatrol's full-fleet solution has been successfully deployed across more than 100 school districts.