

AFFIDAVIT

AFFIANT, being first duly sworn, deposes and says of her own personal knowledge:

My name is MOHAMAD GADAR. I am the sole owner of M.G ENTERPRISE USA LLC. I have been in business in the state of NEW JERSEY. I am licensed by the state of engage in the business of Automobile under License 1475485. I have been in business for 3 Years.

As a car dealer I purchase and sell cars overseas. Specifically, I ship cars to Cotonou in the Country of Benin. Based on the policies, rules, regulations and restrictions that govern the shipping, moving and selling of automobiles overseas, I am required to retain the aid of a Forwarder to move my vehicles. The Forwarder receives my vehicles at a port in the United States and stages the vehicles in designated port facilities to await a vessel. Before the vehicles are loaded onto vessels, a Dock receipt must be created that contains information about the vehicle, the destination, the intended recipient of the vehicle and a "consignee."

I am required to include consignee because the vehicle cannot be shipped to an individual. Based on the local rules at the port in Cotonou, all vehicles must include a consignee who receives the vehicle and places it in a parking area pending delivery to the intended owner. The intended owner's name is placed in the "notify" box on the Dock receipt. The use of the Company Ellissa or any other consignee for that matter is incidental. Using Ellissa as a consignee is akin to choosing to park your vehicle in a Colonial parking garage rather than a PMI parking garage in the Washington DC area. Consignees are fungible and have no property interest in the vehicles. Ellissa charges a fee of \$150 for each vehicle that is stored on their lots but has no interest, dominion, right to possession, or authority over the vehicles. Moreover, I have no contact or association with Ellissa. Ellissa is a park similar to any other park located in the transit area for car business in Cotonou Benin.

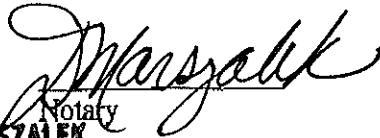
Finally, I was notified that Ellissa had been designated a "SDNT" on or about January 26, 2011. My vehicles were out of my possession before then. I did not have notice that Ellissa was a "SDNT." Once I received notice, I began to ensure that none of my vehicles had any association with Ellissa or any of the other companies or individuals listed in the Department of Treasury letter (undated) "FAC No. FNK-511732, that states "on January 26, 2011, OFAC identified Elisa Exchange and Hassan Ayash Exchange Co... as specially designated Narcotics Traffickers."

I am in the Automobile business. I innocently listed or agreed to list Ellissa as my consignee. I did not know nor suspect that Ellissa was in any way engage in illicit business. Had I known before I would not have listed Ellissa as a consignee. I have never benefitted from the use of Ellissa as a consignee in any way. I am in the business of buying and selling cars to make an honest living. The seizure of my vehicles has been catastrophic to my business, my livelihood, my emotional health and is affecting my personal life. I was engaging in honest work to make a living. It is patently unfair to seize my vehicles because I happened to place the name of a company that was simply going to provide parking space for my vehicles at their port of destination on a Dock receipt, especially since the U.S. Government did not designate Ellissa as a "SDNT" until the vehicles were out of my possession and the Dock receipt created.

MOHAMAD GADAR
NAME OF AFFIANT

06-16-2011
Date

Subscribed and sworn to before me on 6/16, 2011 at Middlesex COUNTY,
NJ
State



Notary
DAWN M. MARZIALEK
NOTARY PUBLIC OF NEW JERSEY
Commission Expires 8/22/2012

Affiant

