

AFFIDAVIT

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

My name is Chadi Nassif. My business address is 44075 Pipeline Plaza, suite 300, Ashburn, VA, 20147. I am employed by Sallaum Group as an office manager. Among my responsibilities is preparing shipping documents for vehicles to process through U.S. Customs. Sallaum Group also employs a customer service representative specifically tasked with the duties of inputting required information into Customs and Border Protection, Automated Export System. The process to ship a vehicle requires that our company complete certain documents including dock receipts and to input other required information into the Customs and Border Protection, Automated Export System ["AES"].

On or about June 27, 2011, our former customer service employee Mr. Ali Elzein, mistakenly inputted information into AES indicating that Elissa Group would be the consignee for seventeen vehicles designated for shipping to Cotonou, Benin. The list of the subject vehicles is attached. The owners of the vehicles A Plus Auto Brokers did not designate Elissa Group as its consignee in Cotonou but selected Societe Rhea. See attached email from A Plus E Auto Brokers, dated May 27, 2011. Our employee negligently inputted Elissa Group into AES. Elissa Group did serve as a consignee in the past. On January 26, 2011, we received notice that Elissa Group had been designated as an entity under the Drug Kingpin Trafficking Act. Accordingly we seized all business activity with Elissa Group. Our employee either through habit, oversight, or negligence inputted into the AES Elissa Group as the consignee for the seventeen vehicles. That was a mistake. The owners of the vehicles selected "Societe Rhea" as its consignee in Cotonou. Our dock receipts clearly indicated that selection. There was never any intent on the part of any party, the owners or Sallaum Group, to select Elissa Group.

We have suffered substantial losses from working with Elissa Group and in listing them as our consignee in January before they became a designated entity. CBP currently holds 350 vehicles that were seized because we elected Elissa Group as our consignee not realizing that they were going to become a designated entity. Once we learned that Elissa Group is a designated entity we seized ALL transactions with Elissa Group to ensure we suffer no additional losses. Our former employee -Mr. Ali Elzein- who mistakenly inputted Elissa Group as a consignee in AES has been fired. To be clear, we did not intend to use, associate, transact or conduct any business whatsoever with Elissa Group. The Dock receipts clearly show that the consignee is Societe Rhea. The carrier's manifest is the operative document upon arrival at the port of destination. The manifest was built based on the dock receipts and not the AES system. The Dock receipts reflect the accurate information, that the consignee is Societe Rhea and not Elissa Group.

CHADI NASSIF
NAME OF AFFIANT

8/8/11
Date