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THE LAW FIRM OF PUCKETT AND FARAJ, PC

August 8, 2011

Via FEDEX
Via facsimile (617) 565-6277

Customs and Border Protection
FPRP 10 Causeway St.
Boston, MA 02222

Re: OFAC# 2011-6-9-CBP 01249; A Plus E Auto Brokers and Sallaum Group seized vehicles

Dear Sir or Madame,

Our firm was retained by Sallaum Group and A Plus E Auto Brokers to secure the release of seventeen vehicles seized by CBP. On June 27, 2011, CBP seized seventeen vehicles and issued custody receipts for the seized property. The custody receipts are numbered 4786418-35. The vehicles were seized because the forwarding agent mistakenly inputted Elissa Group as a consignee for the vehicles into the Automated Export System. The actual consignee that should have been listed is Societe Rhea. Sallaum Group's customer service representative mistakenly listed Elissa Group. That employee, Mr. Ali Elzein, has been fired. A Plus E Auto Brokers request that their vehicles be released and submit the following in support of their request.

A Plus E Auto Brokers is a licensed bona fide business entity in the United States. It engages in the purchasing, shipping and selling of used automobiles. On or about May 27, 2011, A Plus E Auto Brokers delivered seventeen vehicles to a forwarding agent, Sallaum Group. *See Exh. A list of vehicles seized*. A Plus E Auto Brokers also communicated to Sallaum Group's representative Mr. Chadi Nassif, that its designated consignee at the port of destination in Cotonou, Benin, is Rhea Societe. *See Exh. B email from Mr. Elie Houways to Mr. Chadi Nassif dated May 27, 2011*. Mr. Nassif completed dock receipts for all seventeen vehicles and correctly listed Societe Rhea as the consignee. The Dock receipts were completed on or about June 1, 2011. Mr. Nassif then tasked Sallaum Groups customer service representative Mr. Ali Elzein with inputting the information into the AES. Mr. Elzein negligently listed Elissa as the consignee in the AES. Subsequent to that information being submitted into the AES, CBP seized the vehicles because Elissa has been flagged as a designated entity under the Drug Kingpin Trafficking Act. Mr. Elzein has since been fired from his employment. Mr. Elzein received no direction or advice from anyone at Sallaum Group or A Plus E Auto Brokers to list Elissa as the consignee. *See Exh. C Affidavit of Mr. Nassif dated August 8, 2011*. His acts were independent and were either negligently based on past dealing with Elissa Group or deliberate acts intended to damage the relationship between Sallaum Group and A Plus E Auto Brokers and to cause substantial financial losses.

The dock receipts are the operative documents used by the shipping line to handle and transfer cargo upon arrival at the port of destination. The dock receipts for all seventeen vehicles clearly indicate that Societe Rhea is the designated consignee and not Elissa Group. *See Exh. D dock receipts*. There is no reason whatsoever for Sallaum Group to list Elissa. Sallaum Group and several of their clients currently have more than 350 vehicles blocked because they had listed Elissa Group as their consignee

before Elissa Group became a designated entity but before the vehicles had left their various ports. All parties have learned a very expensive lesson about dealing with Elissa Group and have no reason to do so again. The listing of Elissa was either a nefarious act by a disgruntled employee or an act of negligence by a careless employee. In either case, the listing of Elissa Group was neither desired nor directed by the owners of the vehicles nor the forwarder.

Based on the forgoing, Sallaum Group and A Plus E Auto Brokers, respectfully request expeditious release of the vehicles. Because the error is Sallaum Group's, they hereby agree to pay all storage fees and other penalties that may be assessed.

H. Faraj, Esq.
Partner

Copy to:
Department of Treasury, Office of Foreign Asset Control
Sallaum Group
A Plus E Auto Brokers
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