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October 31, 2014

Via E-Mail and Courier

Ms. Karen Gregory, Secretary
Federal Maritime Commission
Office of the Secretary
800 N. Capitol Street, NW
Washington, DC 20573-0001

**RE: METRO FREIGHT SERVICES, INC. d/b/a MARITIME EXPRESS LINES
POSSIBLE VIOLATIONS OF SECTION 19(e)(3) OF THE SHIPPING ACT
AND 46 C.F.R. PART 515**

Dear Ms. Gregory:

We submit one original and five copies of Respondent's Answer to Order of Investigation and Hearing and Affirmative Defenses.

If you have any questions regarding the aforementioned materials, please contact the undersigned at 202-378-2367.

Respectfully submitted,

By:



Carlos Rodriguez, Esq.
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202-378-2319 (Facsimile)

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 14-13

**METRO FREIGHT SERVICES, INC. d/b/a MARITIME EXPRESS LINES –
POSSIBLE VIOLATIONS OF SECTION 19(e)(3) OF THE SHIPPING ACT
AND 46 C.F.R. PART 515**

ANSWER TO ORDER OF INVESTIGATION AND HEARING

Respondent Metro Freight Services, Inc. d/b/a Maritime Express Lines (“Metro Freight” or “Respondent”) by and through its attorneys, Husch Blackwell LLP, hereby submits this Answer to Order of Investigation and Hearing issued by the Federal Maritime Commission (“Commission”) as follows:

**STATEMENT OF FACTS
CONSTITUTING BASIS OF VIOLATIONS**

1. Metro Freight Services, Inc. dba Maritime Express Lines (M.E.L.) (Metro Freight) is a licensed, tariffed and bonded ocean transportation intermediary (OTI), providing service as a freight forwarder and NVOCC (Org. No. 006490).

Answer: Paragraph 1 is admitted.

2. Metro Freight’s offices are located at 1225 West St. George Avenue, Linden, New Jersey, 07036.

Answer: Paragraph 2 is admitted.

3. Metro Freight was incorporated in the State of New York in 1985, and is registered with the

State of New Jersey as a foreign corporation doing business in that state.

Answer: Paragraph 3 is admitted.

4. Metro Freight holds itself out to do OTI business through its Internet website, www.metroiff.com.

Answer: Paragraph 4 is admitted.

5. Metro Freight holds itself out as an NVOCC through its automated tariff (#006490-001) published by Distribution Publications, Inc at <http://www.dpiusa.com>.

Answer: Paragraph 5 is admitted.

6. Metro Freight maintains an NVOCC bond, No. 570364, in the amount of \$75,000 and a freight forwarder bond, No. W6009, in the amount of \$50,000 with American Alternative Insurance Corporation in Princeton, New Jersey.

Answer: Paragraph 6 is admitted.

7. Through April 2010, OTI licensing records maintained by the Commission's Bureau of Certification and Licensing (BCL) identify Georges T. Samaha as the sole Qualifying Individual (QI) for Metro Freight.

Answer: Respondent is without knowledge or information thereof to Answer Paragraph 7.

8. On or about February 29, 2012, Metro Freight submitted to the Commission's Bureau of Enforcement (BOE) written responses to an OTI compliance questionnaire, dated February 2, 2012.

Answer: Paragraph 8 is admitted.

9. Metro Freight's February 29, 2012 response identified its QI, Georges Samaha, as deceased.

Answer: Paragraph 9 is admitted.

10. On information and belief, the former QI and owner of Metro Freight, Georges Samaha, passed away on August 6, 2011.

Answer: Paragraph 10 is admitted.

11. Metro Freight's February 29, 2012 response identified Metro Freight as having handled 634 export ocean shipments as an OTI ocean freight forwarder in the 12 months immediately prior.

Answer: Paragraph 11 is admitted.

12. Metro Freight's February 29, 2012 response identified G&M Export Corporation as a shipper of cargo affiliated with Metro Freight.

Answer: Paragraph 12 is admitted.

13. Metro Freight's February 29, 2012 response identified G&M Export's address as 1225 West St. George Avenue, Linden, New Jersey, 07036.

Answer: Paragraph 13 is admitted.

14. Metro Freight's February 29, 2012 response identified G&M Export as sharing office space, expenses and/or personnel with Metro Freight.

Answer: Paragraph 6 is admitted.

15. Metro Freight's February 29, 2012 response identified Paola C. Samaha as the 100% owner of G&M Export.

Answer: Paragraph 15 is admitted.

16. By letter dated March 6, 2012, BOE advised Metro Freight of its obligation to submit an application for a proposed replacement QI. 46 C.F.R. §515.18(c).

Answer: Paragraph 16 is admitted.

17. By follow-up letter to BOE dated March 16, 2012, Metro Freight advised that it had collected freight forwarder compensation on 28 shipments in which G&M Export was the shipper named

on the bill of lading issued by the ocean common carrier, United Arab Shipping Company (UASC).

Answer: Paragraph 17 is admitted.

18. On or about May 11, 2012, Metro Freight submitted an application designating Paola C. Samaha as the proposed QI for Metro Freight, replacing Georges Samaha. Mrs. Samaha was identified therein as the President and 100% owner of Metro Freight.

Answer: Paragraph 18 is admitted.

19. In support of its application, Metro Freight submitted a copy of a corporate resolution dated January 3, 2012, designating Paola Samaha as President of Metro Freight to replace the “decendent President, Mr. Georges T. Samaha.”

Answer: Paragraph 19 is admitted.

20. On June 26, 2012, Metro Freight was notified by letter that the Commission’s Bureau of Certification and Licensing (BCL) closed its application for failure to demonstrate that the proposed QI, Paola Samaha, met the requirements to demonstrate prior OTI-related work experience.

Answer: Paragraph 20 is admitted.

21. BCL’s June 26, 2012 letter notified Metro Freight that it was required to promptly submit another application to replace the QI, and that continued operation could result in civil penalties.

Answer: Paragraph 21 is admitted.

22. BCL received no response from Metro Freight regarding the letter issued June 26, 2012.

Answer: Paragraph 22 is admitted.

23. Through September 1, 2014, the Commission’s Bureau of Certification and Licensing has not approved a replacement QI for Metro Freight.

Answer: Paragraph 23 is admitted.

24. According to records of the New York State Division of Corporations, G&M Export was incorporated in the State of New York in 1990.

Answer: Paragraph 24 is admitted.

25. According to records of the New York State Division of Corporations, G&M Export's address is 1225 West St. George Avenue, Linden, New Jersey, 07036.

Answer: Paragraph 25 is admitted.

26. According to records of the New York State Division of Corporations, Paola C. Samaha is currently the Chairman and CEO of G&M Export.

Answer: Paragraph 26 is admitted.

27. According to records in the Commission's SERVCON database, G&M Export is identified as the shipper party named in service contracts with United Arab Shipping Company (UASC), an ocean common carrier.

Answer: Respondent is without knowledge or information thereof to Answer Paragraph 27.

28. UASC service contract No. 2009-130 was first executed on or about February 20, 2009 and signed by Georges T. Samaha as President and CEO of G&M Export.

Answer: Paragraph 28 is admitted.

29. In entering into UASC service contract No. 2009-130, G&M Export certified that its shipper status was cargo owner.

Answer: Paragraph 29 is admitted.

30. The term of UASC service contract No. 2009-130 was February 20, 2009 through February 19, 2010. UASC service contract No. 2009-130 was extended by contract amendments through March 31, 2011.

Answer: Paragraph 30 is admitted.

31. UASC service contract No. 124288 was first executed on or about April 1, 2011 and signed by Paola C. Kamel as President and CEO of G&M Export.

Answer: Paragraph 31 is admitted.

32. In entering into UASC service contract No. 124288, G&M Export certified that its shipper status was cargo owner.

Answer: Paragraph 32 is admitted.

33. The term of UASC service contract No. 124288 was April 1, 2011 through March 31, 2012.

Answer: Paragraph 33 is admitted.

34. UASC service contract No. 187966 was first executed on or about April 17, 2012 and signed by Paola Samaha on behalf of G&M Export.

Answer: Paragraph 34 is admitted.

35. On information and belief, Paola C. Kamel and Paola C. Samaha are the same person.

Answer: Paragraph 35 is admitted.

36. In entering into UASC service contract No. 187996, G&M Export certified that its shipper status was cargo owner.

Answer: Paragraph 36 is admitted.

37. The term of UASC service contract No. 187966 was April 1, 2012 through April 30, 2013. UASC service contract No. 187966 was terminated by Amendment 3, effective February 5, 2013.

Answer: Paragraph 38 is admitted.

38. With respect to the 25 shipments identified in Attachment A, G&M Export was identified as the shipper on the UASC ocean bill of lading.

Answer: Paragraph 38 is admitted.

39. With respect to the 25 shipments identified in Attachment A, Metro Freight invoiced or collected freight forwarder compensation for shipments in which G&M Exports was the shipper.

Answer: Paragraph 39 is admitted.

40. On May 28, 2014, the Commission's New York Area Representative Ron Podlaskowich visited Metro Freight's offices and interviewed staff at the offices of Metro Freight, and confirmed that Metro Freight was still operating as an OTI in the absence of an approved QI.

Answer: Paragraph 40 is admitted.

41. Each OTI licensee must have and continuously maintain an approved Qualifying Individual having the necessary experience in OTI activities and the necessary character to render OTI services. The Commission's regulations at 46 C.F.R. § 515.18 (a)(6) and (c) require that when a corporation has been licensed on the basis of the qualifications of an officer of the company and that individual no longer serves in a full time and active capacity, the licensee must report such change to the Commission within 30 days and within that time period furnish to the Commission the names and detailed intermediary experience of any other active officer who may qualify the licensee.

Answer: The allegations in Paragraph 41 of the Order of Investigation and Hearing purport to state conclusions of law as to which no response is required.

42. Section 19(e) of the Shipping Act, 46 U.S.C. § 40904 states that an ocean freight forwarder may not "receive compensation from a common carrier for a shipment in which the ocean freight forwarder has a direct or indirect beneficial interest." The Commission regulations further specify that a freight forwarder "may not receive compensation from a common carrier with respect to any shipment in which the forwarder has a beneficial interest or with respect to any

shipment in which the holding company, subsidiary, affiliate, officer, director, agent or executive of such forwarder has a beneficial interest.” 46 C.F.R. § 515.42(i).

Answer: The allegations in Paragraph 42 of the Order of Investigation and Hearing purport to state conclusions of law as to which no response is required.

43. The activities of Metro Freight, identified above, were provided as part of and in connection with transportation by water of cargo between the United States and a foreign country for compensation over which the Commission has jurisdiction.

Answer: Paragraph 43 is admitted.

44. Under 46 U.S.C. § 41302(a), the Commission is empowered to investigate any conduct or agreement that the Commission believes may be in violation of the Shipping Act.

Answer: The allegations in Paragraph 44 of the Order of Investigation and Hearing purport to state conclusions of law as to which no response is required.

45. The Commission may, after notice and opportunity for hearing, issue an order relating to any violation of the Shipping Act, including assessment of a civil penalty. 46 U.S.C. § 41304.

Answer: The allegations in Paragraph 45 of the Order of Investigation and Hearing purport to state conclusions of law as to which no response is required.

46. The Commission may suspend or revoke an OTI license if the Commission finds that the OTI willfully failed to comply with an order or regulation of the Commission. 46 U.S.C. § 40903(a).

Answer: The allegations in Paragraph 46 of the Order of Investigation and Hearing purport to state conclusions of law as to which no response is required.

47. It is alleged that Metro Freight violated the Commission’s regulations at 46 C.F.R. § 515.18 (a)(6) and (c) by failing to promptly notify the Commission of the death of its QI and failing to

timely seek and obtain approval of a replacement Qualifying Individual.

Answer: The allegations in Paragraph 47 of the Order of Investigation and Hearing purport to state conclusions of law as to which no response is required.

48. It is alleged that, with respect to the 25 shipments identified in Attachment A, Metro Freight violated section 19(e)(3) of the Shipping Act and the Commission's regulations at 46 C.F.R. §515.42(i), by receiving freight forwarder compensation from a common carrier for shipments in which Metro Freight had a direct or indirect beneficial interest.

Answer: The allegations in Paragraph 48 of the Order of Investigation and Hearing purport to state conclusions of law as to which no response is required.

AFFIRMATIVE DEFENSES

1. 46 C.F.R. §515.18 (c) provides in relevant parts that upon the death of the qualifying individual, the licensee within a 30-day period, "shall furnish to the Commission the name(s) and "detailed intermediary experience of any other active managing partner(s) or officer(s) who may qualify the licensee. . . . The licensee may continue to operate as an ocean transportation intermediary while the Commission investigates the qualifications of the newly designated partner or officer."

2. In Paragraph 16, Respondent admits that by letter dated March 6, 2012, BOE advised Metro Freight of its obligation to submit an application for a proposed replacement QI. 46 C.F.R. §515.18(c).

3. In Paragraph 18, Respondent admits that on or about May 11, 2012, Metro Freight submitted an application designating Paola C. Samaha as the proposed QI for Metro Freight, replacing Georges Samaha, and that the Federal Maritime Commission accepted the application for processing.

4. In Paragraph 20 and 21, Respondent admits that it received notification by letter dated June 26, 2012, that Ms. Paola C. Samaha did not have the requisite experience to act as qualifying individual for Respondent, and that a new qualifying individual should be submitted for that purpose.

5. Respondent submitted a new application designating Mr. Zahir Mahmud, Vice-President Operations as the proposed qualifying individual (QI) for Metro Freight on or about January 23, 2013, Application Filing ID # 105893. See Exhibit 1, Application # 105893.

6. On information and belief, Respondent issued and remitted a check (check no. 8829, Exhibit 2) dated October 3, 2012, to the Federal Maritime Commission as a filing fee in the amount of \$125, the requisite filing fee for an electronic filing.

7. Respondent did not initiate, nor did it ever receive any follow-up inquiries from the Federal Maritime Commission, nor did the Federal Maritime Commission indicate that the filing fee had not been received. On or about October 29, 2014, Respondent was made aware that the FMC staff had not received the filing fee and that it was not processing the filed application. Respondent has since confirmed that check 8829 was never returned as cancelled.

8. Upon information and belief, the electronic application which was filed January 23, 2013, remained an open electronic file until on or about October 23, 2014.

9. On October 21, 2014, in view of the receipt of the Order of Investigation, Respondent through its counsel, refiled the same exact application which had been filed on January 23, 2013, submitted it electronically and fees in the amount of \$125.00 were paid electronically, a feature which had not been part of the FMC electronic filing process in January, 2013, when the original filing had been accomplished for a qualifying individual for Respondent.

PRAYER FOR RELIEF

Wherefore, Respondent respectfully requests the following relief:

(a) That in view of the mitigating facts in relation to allegations related to violations of 46 C.F.R. §515.18 (c) (c), that Respondent be given an opportunity to settle this matter with the Bureau of Enforcement, subject to approval of such settlement by the Administrative Law Judge; and (b) Granting Respondent such other and further relief as may be just and proper.

Respectfully submitted,

By:



Carlos Rodriguez, Esq.
Husch Blackwell LLP
750 17th Street NW, Suite 900
Washington DC 20006
202-378-2365 (Telephone)
202-378-2319 (Facsimile)
Attorneys for Respondent
Metro Freight Services, Inc. d/b/a
Maritime Express Lines

Dated in Washington, D.C. this thirty-first day of October, 2014.

VERIFICATION

Mr. Zahir Mahmud, Vice-President Operations, declares and states that he is the Vice-President Operations of Metro Freight Services, Inc. d/b/a Maritime Express Lines, Respondent in this proceeding, and that the foregoing Verified Answer is true to the best of his information and belief; and that the grounds of his belief as to all matters not upon his own personal knowledge is information which has otherwise been provided to Respondent.

Pursuant to 28 U.S.C. § 1746 (2), I verify under penalty of perjury that the foregoing is true and correct.

Executed on October 31, 2014

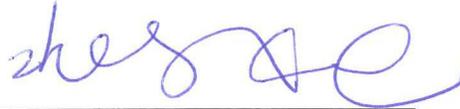


Mr. Zahir Mahmud, Vice-President
Operations, Metro Freight Services, Inc.
d/b/a Maritime Express Lines

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the following individuals by first-class mail:

Peter J. King, Director
Bureau of Enforcement
Federal Maritime Commission
800 North Capital Street, N.W.
Washington, D.C. 20573



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202-378-2367 (Telephone)
202-378-2319 (Facsimile)
Attorneys for Respondent
Metro Freight Services, Inc. d/b/a
Maritime Express Lines

Dated in Washington, D.C., this thirty-first day of October, 2014.

EXHIBIT – 1

FMC-18 APPLICATION, FILING ID #105893

Form **FMC-18****APPLICATION FOR A LICENSE**

OMB No. 3072-0018

(Rev October 2007)

AS AN OCEAN TRANSPORTATION INTERMEDIARY

(Expires 02/28/2014)

Federal Maritime
Commission**PART A****GENERAL
TO BE COMPLETED BY ALL APPLICANTS**

APPLICATION MUST BE TYPED

a. Name of corporation, partnership, or sole proprietorship:

License No. (if any)

METRO FREIGHT SERVICES, INC.**002885NF**

b. Trade name(s):

 Trade name used for NVOCC services only**MARITIME EXPRESS LINES (M.E.L.)** Trade name used for OFF services only Trade name used for both services

c. Principal Place of Business Address: number, street, and room or suite number:

1225 W. ST. GEORGE AVENUE

d. City or town, state, ZIP code, and country:

LINDEN**NJ****07036****United States**

e. (Area code) telephone number:

(Area code) fax number:

Website

908-925-8400**908-025-8444**

f. E-Mail address/URL of contact person or QI:

Name of Contact Person or QI:

INFO@METROIFF.COM**ZAHIR MAHMUD**

g. Is this a new address?

 Yes No

h. Mailing address if different from principal place of business (P.O. Boxes may be used):

City or town, state, ZIP code, and country:

i. Application for (check as many as applicable and complete the designated Parts for the boxes checked):

- new license to operate as an ocean freight forwarder (Parts A, B, D, E, F, G)
- new license to operate as a non-vessel-operating common carrier (Parts A, B, D, E, F, G)
- new license to operate as both an ocean freight forwarder and a non-vessel-operating common carrier (Parts A, B, D, E, F, G)
- name change (Parts A, C, G)
- addition / removal of trade name(s) (Parts A, C, G)
- replacement/additional qualifying individual (Parts A, D, E, G)
- business structure change (Parts A, B, E, F, G)

Filing Id: **105893**Status: **Submitted**

Application Name:

Date: **01/25/2013**

license transfer (Parts A, B, C, E, F, G)

Current name _____

to _____

adding NVOCC services to active OFF license (Parts A, F, G)

adding OFF services to active NVOCC license (Parts A, F, G)

All questions within applicable parts must be answered or noted "N/A."

PART D

QUALIFYING INDIVIDUAL

TO BE COMPLETED BY APPLICANTS FOR AN OCEAN TRANSPORTATION INTERMEDIARY LICENSE AND REPLACEMENT / ADDITIONAL QUALIFYING INDIVIDUALS

9. Name of proposed qualifying individual:

ZAHIR

MAHMUD

Title:

VICE PRESIDENT OPERATION

Business address: number, street, and room or suite number, city, state, zip code, country (If different from principal address)

1225 W. ST. GEORGE AVENUE

LINDEN

NJ

07036

United States

S.S. Number:

DOB

Place of Birth

City, state, country

- ## 7324

9/1/1967

Comilla

Bangladesh

US Citizen or Resident Alien: (If Resident Alien provide No.)

US Citizen

10. Is the proposed qualifying individual a (an):

Initial Qualifying Individual

Additional Qualifying Individual

Replacement Qualifying Individual

(Name of individual being replaced:)

GEORGES T. SAMAHA

11. Position the qualifying individual holds as a corporate officer, member, or active partner:

(Attach proof of position held, i.e., minutes from meeting electing officers)

VICE PRESIDENT OPERATIONS

12. Length of qualifying ocean transportation intermediary experience (Years/Months):

12 years / 11 months

13. Has the proposed qualifying individual(s) ever:

(1) been submitted as the qualifying individual for another company?

Yes No

(2) been found in violation of any shipping act?

Yes No

or paid penalty in settlement of?

Yes No

(3) filed or been involved in a bankruptcy proceeding, other than as a claimant, been declared bankrupt, been subject to a tax lien, or had legal judgment rendered for a debt?

Yes No

(4) been ARRESTED, CHARGED, CONVICTED OF, OR FORFEITED

COLLATERAL for any FELONY, MISDEMEANOR, OR OTHER VIOLATION?

Yes No

(Omit: 1. traffic violations for which a fine of \$250 or less was paid;

2. any incident which happened before qualifying individual's 21st birthday.)

If the response to any part of this question is "Yes", please attach explanation. For bankruptcy, please include order of discharge

For tax lien, please provide release of lien. For judgment, please provide satisfaction of civil judgment.

14. Employment history of qualifying individual demonstrating experience in ocean transportation intermediary services:

(Enter most recent history first)

(a) Employer's name: **METRO FREIGHT SERVICES, INC.** Dates employed: (Month/Year) **01/2002** to **/Present**

Number, street, and room or suite number: **1225 W. ST. GEORGES AVENUE** FMC License No. (If applicable): **002885NF**

City or town, state, and ZIP code: **LINDEN NJ 07036**

Area code/telephone number: **908-925-8400** Area code/fax number: **908-925-8444** Email address: **MZAHIR@METROIFF.COM**

Name of Supervisor: **PAOLA C. SAMAHA** Type of business: **LICENSED FMC OTI**

Description of ocean transportation intermediary duties performed:

Mr. Mahmud performs all duties and responsibilities as described in Commission's regulations, 46CFR 515, 520 and 532. Book cargo; prepare bills of lading; file AES declarations; issue letters of credit and dock receipts; arrange for the pick-up and delivery of cargo.

15. Identify three (3) persons, unrelated to the qualifying individual or applicant, who have first-hand knowledge of the actual ocean transportation intermediary experience of the qualifying individual.

Name:

FRANK YURMAN

Title:

ACCOUNT EXECUTIVE

Employer's name:

NATIONAL SHIPPING COMPANY OF SAUDI ARABIA (AMERICA), INC. (NCSA)

Number, street, and room or suite number:

400 E. PRATT STREET

City or town, state, and ZIP code:

BALTIMORE**MD****21202**

Area code/telephone number:

410-625-7000

Area code/fax number:

Email address:

fyurman@nscsaamerica.com

Time period when person named above had knowledge of qualifying individual's experience.

2004 -TO- PRESENT

Nature of business relationship through which person gained first-hand knowledge of the qualifying individual's ocean transportation intermediary experience.

Mr. Yurman has first-knowledge of Mr. Mahmud's ocean transportation intermediary ("OTI") experience because Mr. Yurman provided VOCC services on behalf of National Shipping Company of Saudi Arabia to Mr. Mahmud on behalf of Metro Freight Services, Inc. d/b/a Maritime Express Lines, a licensed FMC OTI during the above-mentioned time period.

Name:

HANI BARGHASH

Title:

PRESIDENT

Employer's name:

MILLENIUUM MARINE CORPORATION

Number, street, and room or suite number:

399 HOES LANE

City or town, state, and ZIP code:

PISCATAWAY**NJ****08854**

Area code/telephone number:

732-562-0600

Area code/fax number:

732-562-2828

Email address:

HANIB@MILLENIUUMMARINE.COM

Time period when person named above had knowledge of qualifying individual's experience.

FEBRUARY, 2002 -to- PRESENT

Nature of business relationship through which person gained first-hand knowledge of the qualifying individual's ocean transportation intermediary experience.

Mr. Barghash has first-knowledge of Mr. Mahmud's ocean transportation intermediary ("OTI") experience because Mr. Barghash provided VOCC services on behalf of Millenium Marine Corporation to Mr. Mahmud on behalf of Metro Freight Services, Inc. d/b/a Maritime Express Lines, a licensed FMC OTI during the above-mentioned time period.

Name:

HASSAN FATTOUCH

Title:

ACCOUNT EXECUTIVE

Employer's name:

UNITED ARAB SHIPPING COMPANY (UASC)

Number, street, and room or suite number:

511 SOUTH AVENUE

City or town, state, and ZIP code:

CRANFORD**NJ****07016**

Area code/telephone number:

908-272-0050

Area code/fax number:

908-272-9221

Email address:

HASSAN.FATTOUCH@UASC.NET

Time period when person named above had knowledge of qualifying individual's experience.

2004 -TO- PRESENT

Nature of business relationship through which person gained first-hand knowledge of the qualifying individual's ocean transportation intermediary experience.

Mr. Fattouch has first-knowledge of Mr. Mahmud's ocean transportation intermediary ("OTI") experience because Mr. Fattouch provided VOCC services on behalf of United Arab Shipping Company to Mr. Mahmud on behalf of Metro Freight Services, Inc. d/b/a Maritime Express Lines, a licensed FMC OTI during the above-mentioned time period.

PART E

OWNERSHIP AND AFFILIATIONS

TO BE COMPLETED BY APPLICANTS FOR AN OCEAN TRANSPORTATION INTERMEDIARY LICENSE, AND TO REPORT OWNERSHIP CHANGES, BUSINESS STRUCTURE CHANGE, LICENSE TRANSFER, AND IF APPLICABLE, CHANGES RESULTING FROM A CHANGE IN PERSONNEL OR REPLACEMENT/ADDITIONAL QUALIFYING INDIVIDUAL

16. Applicant's Ownership, Officers, Partners, Members, Directors, Stockholders, Parent or Holding Company:

Name of
Officer/Director/Partner/Stockholder/Business Entity

First Name: <u>PAOLA</u>	Middle Name: <u>C.</u>	Last Name: <u>SAMAHA</u>
Title: <u>PRESIDENT</u>		S.S. Number: <u>###-##-0951</u>
Business Entity Name: _____		% of Ownership: <u>100.00</u> %
First Name: <u>ZAHIR</u>	Middle Name: _____	Last Name: <u>MAHMUD</u>
Title: <u>SECRETARY / VP OPERATION</u>		S.S. Number: <u>###-##-7324</u>
Business Entity Name: _____		% of Ownership: <u>0.00</u> %
First Name: <u>KHALID</u>	Middle Name: _____	Last Name: <u>MAHMUD</u>
Title: <u>SECRETARY / TREASURER / VP FINANCE</u>		S.S. Number: _____
Business Entity Name: _____		% of Ownership: <u>0.00</u> %

17. If applicant will operate as an OFF, will applicant, its qualifying individual(s), or any officer, director, partner, member, stockholder, parent or holding company have a beneficial interest in shipments moving in the U.S. foreign commerce? Yes No N/A – Applicant will not operate as an OFF
 If "Yes," identify the name and address of each person or entity having a beneficial, proprietary, or financial interest in shipments moving in the U.S. foreign commerce and the nature of such beneficial interest.

Describe Related Company

First Name:	Middle Name:	Last Name:	Business Entity Name:
_____	_____	_____	_____

Nature of Beneficial Interest:

18. Is either applicant or its qualifying individual(s) related to any other entity by reason of ownership, employment, common officers, members, directors, stockholders, parent or holding company? Yes No

If "Yes," identify the name, address, and phone number of each entity related to the applicant or its qualifying individual; describe the relationship or affiliation to applicant or qualifying individual and the type of business in which such entity is engaged. Describe the primary business of the parent or holding company or related company. You may submit organization charts and annual reports which provide the information.

Person or Business Entity in Question 16 that has Relationship

First name:	Middle Name	Last Name:	Business Entity Name:
PAOLA	C.	SAMAHA	

Related Business Entity:

Business Entity Name:

G & M EXPORT CORPORATION

Related Business Entity's Address/Phone:

Number/Street/Suite Number:	City:	State:
1225 W. ST. GEORGES AVENUE	LINDEN	NJ

Country:	Zip:	Telephone:
United States	07036	908-925-8400

Primary Business of Related Entity:

SHIPPER AND TRADING COMPANY

Nature of Relationship or Affiliation:

Ms. Paola Samaha is the CEO, President and 100% shareholder of G&M Export Corporation

EXHIBIT – 2

METRO FREIGHT SERVICES, INC. CHECK # 8829
FMC APPLICATION FILING FEE

METRO FREIGHT SERVICES, INC.

1225 W. ST. GEORGE AVE., LINDEN, NJ 07036
TELEPHONE (908) 925-8400 FAX (908) 925-8444



55-136-312

8829

10/03/12

CHECK NO. 8829

PAY One Hundred Twenty-Five and 00/100

AMOUNT
\$125.00

Details on back
FD

THE FEDERAL MARITIME COMMISSION

TO THE
ORDER
OF

NOT NEGOTIABLE

Chad M. Hamud
AUTHORIZED SIGNATURE

⑈008829⑈ ⑆031201360⑆ 7882944514⑈

METRO FREIGHT SERVICES, INC.

8829

FEDMAR

10/03/12 QI REPLACEMENT

\$125.00

QI REPLACEMENT

NOT-NEGOTIABLE

\$125.00