

FEDERAL MARITIME COMMISSION

DOCKET NO.: 15-04

CROCUS INVESTMENTS, LLC AND CROCUS, FZE

v.

**MARINE TRANSPORT LOGISTICS, INC. AND ALEKSANDR SOLOVYEV
a/k/a ROYAL FINANCE GROUP INC.**

COMPLAINANTS' RESPONSE TO SUPPLEMENT THE RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document by mailing and emailing a copy to the persons listed below:

Stephen H. Vengrow
Eric Chang
Montgomery, McCracken,
Walker & Rhoads, LLP
437 Madison Ave., 29th Floor
New York, NY 10022

Dated: April 22, 2016

s/Louiza Tarassova

Louiza Tarassova, Esq.
Attorney for Complainants
Florida Bar Number: 96149
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COMPLAINANTS' RESPONSE TO SUPPLEMENT THE RECORD

COME NOW, Complainants, Crocus Investments, LLC and Crocus, FZE and file this Response to Supplement the Record in response to the Order to Supplement the Record served on Complainants on April 12, 2016.

The Order requests that parties file any additional documentation in relation to the “transportation of the 2008 Chaparral and the 2011 Monterey from Dubai to the United States...on or before April 22, 2016.”

The following documents within the Complainants' Appendix also relate to the transportation of the 2008 Chaparral and the 2011 Monterey from Dubai to the United States:

1. CX 058-CX 059 – Emails between Alex Solovyev and Emirates Logistics regarding the shipment of boats from Dubai to the United States.

The following documents are a supplement to Complainants' Appendix relating to the transportation of the 2008 Chaparral and the 2011 Monterey from Dubai to the United States:

2. Certification of Alexander Safonov dated April 21, 2016 (See Attached.)

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CERTIFICATION OF ALEXANDER SAFONOV

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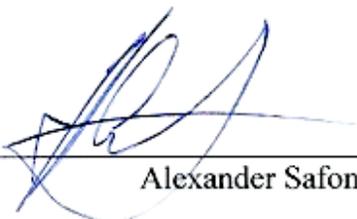
CERTIFICATION OF ALEXANDER SAFONOV

Alexander Safonov, pursuant to 28 U.S.C. § 1746, making the following Certification under penalty of perjury, in lieu of an oath or affidavit says:

1. I am the President and Owner of a corporation known as Crocus Investments (“Crocus”), a party to this action.
2. I am also an owner of a foreign corporation known as Middle East Asia Alfa, FZC, a non-party to this action.
3. On or about April 1, 2014 I told my assistant, Andrey Tretykov, to arrange delivery of two boats 2008 CHAPARRAL 190 SSI and 2011 MONTEREY 204 (collectively hereinafter “the boats”) to the USA.
4. My assistant found two companies that can deliver the boats for approximately \$4,000.00, but then he received a better offer for the same delivery from Aleksandr Solovyev for \$1,500.00.
5. I agreed to the proposal made by Alexander Solovyev with the understanding that Marine Transport Logistics, Inc. (hereinafter “MTL”) will arrange for the shipment of the boats from Dubai, UAE and the boats will be picked up and held by MTL in the USA.
6. Solovyev and I agreed to discuss the details of routing the boats within the US later, upon their arrival.
7. The boats were shipped from Dubai on May 30, 2014.
8. Solovyev stopped communicating with me.
9. On August 13, 2014 Solovyev sent a demand letter via email to pay fees for storage of the boats and customs fees which he alleged MTL paid for the boats.

10. I subsequently found out that the boats were delivered to MTL's address at 63 Hook Road, Bayonne, NJ 07002 and Solovyev and MTL now claim that the boats are in possession or custody of World Express & Connection, Inc., a company owned by Soloveyv's.

Executed on April 21, 2016



Alexander Safonov