

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 15-10

**REVOCATION OF LICENSE NO. 017843
WASHINGTON MOVERS, INC.**

**WASHINGTON MOVERS INTERNATIONAL INC.’S PARTIAL RESPONSE TO THE
BUREAU OF ENFORCEMENT’S STATEMENT IN RESPONSE TO INITIAL ORDER**

Pursuant to this Court’s initial order, dated February 18, 2016, Washington Movers International, Inc. (“Washington Movers”) respectfully submits the following response to the Bureau of Enforcement’s (the “BOE”) “Statement in Response to Initial Order.”

An evidentiary hearing is important to establish the credibility of Washington Movers’ witnesses and address parties’ factual disputes. Washington Movers’ similarly agrees that written discovery, including requests for admissions, interrogatories, and requests for production are appropriate to aid in resolution of the parties’ factual disputes. (BOE’s Statement in Response to Initial Order, p. 4).

The Federal Maritime Commission’s (the “FMC”) February 12, 2016 order indicates that Washington Movers’ vigorously disputes (1) the extent to which Sam Ghanem’s criminal conduct implicates Washington Movers and (2) the extent of Sam Ghanem’s current involvement with the company.

With respect to the first factual dispute, Washington Movers' submits that an evidential hearing is necessary to present the testimony, without limitation, of several individuals, including Norma Ghanem and Sandra Rodriguez to rebut the BOE's allegations that Sam Ghanem's conduct should be attributed generally to Washington Movers. In addition to testimony about the circumstances surrounding Mr. Ghanem's criminal conviction, each of the foregoing individuals will testify as to Mr. Ghanem's independence when acting. Particularly, Norma Ghanem and Sandra Rodriguez, two of the longest serving employees of Washington Movers, will testify that neither had any information about Sam Ghanem's actions. These witnesses' testimony and credibility are important and warrant an evidentiary hearing. As explained by the precedent cited in Washington Movers' previous briefings, if no one at a company knew of an affiliate's alleged wrongdoing, then courts interpret such information as a factor in favor of the company as it shows the company's independence.

With respect to the second factual dispute, Norma Ghanem is the "current" owner, director, officer, and individual in complete control of Washington Movers. She has worked with the company for over 15 years, was not aware of Sam Ghanem's wrongful acts, and should be allowed to continue operating the company to support her family. Several other individuals also depend on Washington Movers' for their livelihood, including Sandra Rodriguez who competently manages Washington Movers' office and had no knowledge of Sam Ghanem's wrongful acts. Sam Ghanem has no "current" involvement with Washington Movers. The BOE does not dispute that Sam Ghanem is no longer involved with Washington Movers. The BOE artificially defines "current" to focus these proceedings on Sam Ghanem's misconduct. These proceedings are brought against Washington Movers, and for all intents and purposes, against Norma Ghanem, Washington Movers' current owner. An evidentiary hearing is warranted in these circumstances to give

Washington Movers and Norma Ghanem every opportunity to prove their compliance efforts and independence from a former affiliate's alleged misconduct.

As described by the foregoing, the parties should be permitted to engage in written discovery, take depositions of parties with relevant information, and resolve factual disputes through an evidentiary hearing.

DATED: March 10, 2016

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that on March 10, 2016 I sent a copy of the foregoing statement via e-mail to:

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I certify that on March 11, 2016, I sent an original copy and 5 additional copies of the foregoing statement via first class mail, postage pre-paid to the following:

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