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November 2, 2015

**VIA HAND DELIVERY**

Secretary Karen V. Gregory  
Federal Maritime Commission  
800 N. Capitol Street, NW.  
Washington, DC 20573-0001

**Re:** Washington Movers International Inc.  
Motion to Intervene  
Docket No. 15-10

Dear Ms. Gregory:

Enclosed for filing, please find Norma Ghanem's Motion to Intervene with respect to the Order to Show Cause served by the Commission on Washington Movers International, Inc.

Pursuant to 46 CFR 502.2, also enclosed are 5 copies of the Motion and a disc containing the Motion as a pdf.

Kindly timestamp the receipt copy of the enclosed filing and return it to our office using the self-addressed, postage-paid envelope provided.

Please do not hesitate to contact me at 703-243-3737 with any questions. Thank you.

Sincerely,



Raj H. Patel



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OFFICE OF THE SECRETARY  
FEDERAL MARITIME COMM

**BEFORE THE  
FEDERAL MARITIME COMMISSION**

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**DOCKET NO. 15-10**

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

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**MOTION FOR LEAVE TO INTERVENE**

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Norma Ghanem respectfully moves the Federal Maritime Commission (the "Commission") to grant her leave to intervene as a matter of right in the proceedings against Washington Movers, Inc. ("Washington Movers").

**PRELIMINARY STATEMENT**

On October 8, 2015, the FMC served Washington Movers with an Order to Show Cause relating to the potential revocation of Washington Movers' license no. 017843. The Commission's complaint primarily revolved around Norma Ghanem's husband's conviction, on May 1, 2015, for attempting to transport certain weapons to Lebanon.

Norma Ghanem's husband's conduct is independent of Washington Movers. As of December 31, 2013, Norma Ghanem owns one-hundred percent (100%) of Washington Movers. See Stock Transfer Agreement attached as Exhibit 1. As of January 1, 2014, Norma Ghanem became the sole officer (President, Secretary, and Treasurer) and director of Washington Movers. See Unanimous Written Consent in Lieu of Meeting of Directors attached as Exhibit 2. Norma Ghanem's husband neither owns any interest in Washington Movers, nor serves as an officer or

director of Washington Movers. Washington Movers is Norma Ghanem's business, for which she has worked many years.

As Washington Movers' owner for approximately two (2) years and its employee for approximately twenty (20) years, Norma Ghanem has an undeniable interest in Washington Movers. Norma Ghanem should be granted leave to intervene as a matter of right in the Commission's proceedings against her business in order to preserve and advocate for her interests therein.

### MEMORANDUM OF LAW

#### **I. Norma Ghanem Moves for Leave to Intervene as a Matter of Right and Alternatively With the Permission of the Commission**

Norma Ghanem moves this Commission to grant her leave to intervene *as a matter of right* in the above referenced proceeding as she has an interest relating to the property that is subject of the proceeding, and is so situated that disposition of the proceeding may as a practical matter impair or impede her ability to protect her interest. In the alternative Norma Ghanem moves to intervene with permission. 46 CFR 502.68(c)(1).

Alternatively, Norma Ghanem moves this Commission to grant her leave to intervene as (1) common issues of law or fact exists between her interest and the subject matter of the proceeding, (2) her intervention would not unduly delay or broaden the scope of the proceeding, prejudice the adjudication of the rights, or be duplicative of the positions of any existing party, and (3) her participation may reasonably be expected to assist in the development of a sound record. 46 CFR 502.68(c)(2).

**II. Norma Ghanem is the Owner, Sole Officer, and Sole Director of Washington Movers and Has the Right to Present a Full Case to Protect her Property Rights in Washington Movers**

Norma Ghanem owns one-hundred percent (100%) of Washington Movers. See Stock Transfer Agreement attached as Exhibit 1. As of January 1, 2014, Norma Ghanem became the sole officer (President, Secretary, and Treasurer) and director of Washington Movers. See Unanimous Written Consent in Lieu of Meeting of Directors attached as Exhibit 2. Washington Movers is Norma Ghanem's business. The Commission's proposed revocation of threatens to destroy Norma Ghanem's livelihood and ability to support her three children.

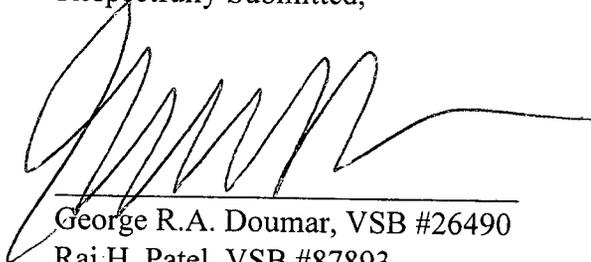
Norma Ghanem intends to utilize discovery procedures to uncover and present relevant and non-duplicative evidence to the Commission. Further, as Washington Movers sole owner, officer and director Norma Ghanem intends to determine the priorities of Washington Mover's defense and control corresponding elements of the proceedings.

Norma Ghanem's property interest in Washington Movers and its license no. 017843 cannot be adjudicated without her involvement. Norma Ghanem has the right to use discovery, present evidence and examine witnesses to the fullest extent permitted by the Code of Federal Regulations, specifically 46 CFR 502.68(d), to preserve and advocate for her property rights in Washington Movers.

Given the foregoing, this Commission should grant Norma Ghanem leave to intervene in the proceeding against Washington Movers.

DATED: November 2, 2015

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'G.R.A. Doumar', with a long horizontal flourish extending to the right.

George R.A. Doumar, VSB #26490

Raj H. Patel, VSB #87893

Doumar Martin PLLC

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**EXHIBIT 1**

**Stock Transfer Agreement**

This Transfer Agreement is entered into as of this 31<sup>st</sup> day of December 2013 by and among Sam R. Ghanem (the "Transferor"), Norma Ghanem (the "Transferee") and Washington Movers, Inc. (the "Corporation"), a Virginia corporation.

WITNESSETH:

WHEREAS, the Transferor is the sole shareholder of the Corporation owning 1,000 shares of common stock (referred to hereinafter as the "Common Stock" of the "Shares");

WHEREAS, the Transferor wishes to transfer the Shares to the Transferee;

WHEREAS, to induce the Corporation to consent to the transfer of Shares by the Transferor to the Transferee, that Transferee wishes to make the agreement set forth herein;

NOW, THEREFORE, the Transferor and the Transferee agree to be legally bound hereby, hereby agree as follows:

1. The Transferor represents and warrants that he is the true and lawful owner of the shares and by separate instrument is transferring to the Transferee, subject to the consent of the Corporation as herein provided, all right, title and interest of the Transferor in and to the Shares.

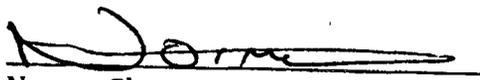
2. The Transferor hereby transfers his entire ownership interest in the Corporation, consisting of 1000 shares, to the Transferee, in exchange for One Hundred Dollars (\$100).

2. In reliance on the foregoing representations, warrants and covenants, the Corporation hereby consents to the transfer of Shares from the Transferor to the Transferee, and agrees to cause such transfer to be reflected on the books and records of the Corporation.

IN WITNESS WHEREOF, the undersigned have executed this Stock Transfer Agreement as of the date first written above.

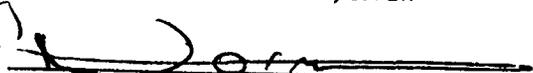
TRANSFEEE

TRANSFEROR:

x   
Norma Ghanem

  
Sam R. Ghanem

WASHINGTON MOVERS, INC.:

  
By:  
Title:

**EXHIBIT 2**

**Washington Movers, Inc.**

**Unanimous Written Consent in Lieu of**

**Meeting of Directors**

The undersigned, being all of the shareholders of Washington Movers, Inc. (the "Corporation"), and acting pursuant to the Virginia Code, and related provisions, and in accordance with the Corporation's Articles of Incorporation, hereby approve and adopt the following resolutions by unanimous written consent of the Directors in lieu of an annual meeting:

RESOLVED: That the Directors approve the transfer of shares by and between Sam R. Ghanem and Norma Ghanem.

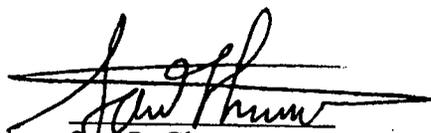
RESOLVED FURTHER: That Sam R. Ghanem is authorized to execute a Share Transfer Agreement on behalf of the Corporation reflecting the transfer of Mr. Ghanem's shares to Mrs. Ghanem.

RESOLVED FURTHER: That Sam R. Ghanem resigns as an officer and director of the Corporation.

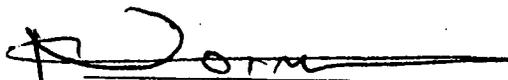
RESOLVED FURTHER: That Norma Ghanem is appointed as the sole officer (President, Secretary and Treasurer) and director of the Corporation.

We further certify that this corporation is duly organized and existing, and has the power to take action called for by the foregoing resolution.

IN WITNESS WHEREOF, the undersigned has caused this instrument to be executed on the date indicated by his signature.

  
Sam R. Ghanem

Date: 1/1/14

  
Norma Ghanem

Date: 1/1/14

**CERTIFICATE OF SERVICE**

I certify that I served an original copy, five additional copies, and a disc containing the pdf version of the foregoing Motion to Intervene on Monday, November 11, 2015 via hand delivery to:

Secretary, Federal Maritime Commission,  
800 N. Capitol Street, NW.,  
Washington, DC 20573-0001

/s/ George R.A. Doumar  
George R.A. Doumar, VSB No. 26490  
Raj H. Patel, VSB No. 87893  
Doumar Martin PLLC  
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