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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.
Reply to Order to Show Cause
Docket No. 15-10

Dear Ms. Gregory:

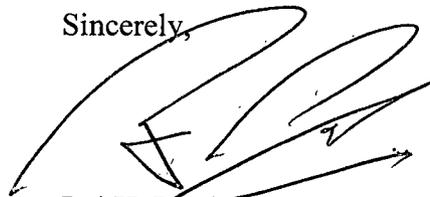
Enclosed for filing, please find Washington Movers International Inc.'s Reply to the Order to Show Cause served by the Commission on October 8, 2015.

Pursuant to 46 CFR 502.2, also enclosed are 5 copies of the Reply and a disc containing the Reply 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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 ORIGINAL

BEFORE THE
FEDERAL MARITIME COMMISSION

DOCKET NO. 15-10

REVOCATION OF LICENSE NO. 017843
WASHINGTON MOVERS, INC.

REPLY TO ORDER TO SHOW CAUSE

Washington Movers International, Inc. ("Washington Movers") respectfully replies to the Federal Maritime Commission's (the "Commission") Order to Show Cause as to why its License No. 017843 (the "License") should not be revoked. In support, Washington Movers states:

PRELIMINARY STATEMENT

Washington Movers is a female-owned Virginia corporation engaged in ocean freight forwarding. Incorporated on July 11, 1996, Washington Movers has arranged shipments of medical supplies, household goods, automobiles, auto equipment, and maritime equipment from the United States to five continents. Most frequently, Washington Movers ships goods from the United States to Arica, Chile. Washington Movers also employs four individuals and contemplates employing more to match their growth.

On October 8, 2015, the FMC served Washington Movers with an Order to Show Cause relating to the possible revocation of Washington Movers' License. The Commission's complaint primarily revolved around Sam Ghanem's May 1, 2015 conviction for attempting to transport certain several firearms overseas and Washington Movers' failure to notify the Commission of

such. As a secondary concern, the Commission raised issue with Washington Movers untimely notification of its name change from Washington Movers, Inc. to Washington Movers International, Inc.

First, Sam Ghanem'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. Sam Ghanem neither owns any interest in Washington Movers, nor serves as an officer or director of Washington Movers. Washington Movers is Norma Ghanem's business. As soon as Sam Ghanem's name became associated with possible criminal conduct, Norma Ghanem, along with Washington Movers' staff, took control to preserve the business.

Second, Washington Mover's untimely notification of its name change is far from "egregious" and does not warrant revocation of its License. Contemporaneously with this reply and under Norma Ghanem's stewardship, Washington Movers has submitted the appropriate FMC-18 forms to the Commission to (1) notify the Commission of Washington Mover's name change and (2) register Norma Ghanem as Washington Mover's qualifying individual. With nearly 20 years of experience and an unblemished record, Norma Ghanem exemplifies the character and fitness of a qualifying individual and will ensure that Washington Movers complies with the Commission's regulations. Norma Ghanem has no association to any criminal activity nor has she ever been subject to criminal charges.

MEMORANDUM TO SHOW CAUSE

I. Washington Movers Never Violated Federal Law

Washington Movers is a separate, distinct female-owned Virginia corporation. Sam Ghanem's individual conduct is independent of Washington Movers. As discussed above, since late 2013, Norma Ghanem serves as Washington Movers' sole owner, officer, and director. Under Norma Ghanem's leadership, Washington Movers employs four individuals, transports a range of goods from wheelchairs to household goods to five continents, and is committed to complying with the Commission's regulations.

Washington Movers was not a party in the federal proceedings against Sam Ghanem. Crim Case. No. RWT 14CR0008 (D.Md.), United States v. Sam Rafic Ghanem. In fact, Mr. Ghanem's alleged criminal conduct took place on Saturday, December 21, 2013, when Washington Movers was closed for business. Id. After two trials, the first of which resulted in the jury deadlocking, Sam Ghanem was convicted of attempted export, 18 U.S.C. §2778, and sentenced to 18 months imprisonment. Through the entirety of the proceedings, other than a passing allegation that Norma Ghanem was possibly within ear shot of a conversation between Sam Ghanem and an informant, no allegations even suggested that Norma Ghanem was involved in any criminal activity. Id. Norma Ghanem and Washington Movers, then and now, remain unimpeachable.

Washington Movers, contemporaneously with this reply, has submitted the appropriate FMC-18 forms to make Norma Ghanem a qualifying individual for its License. With nearly 20 years of relevant experience and an impeccable record, Ms. Ghanem is an ideal candidate to lead Washington Moves and comply with the Commission's applicable regulations.

II. Revocation is Inappropriate in These Circumstances

Given that Sam Ghanem's conduct is unrelated to Washington Movers, and at the most, constitutes a first time offense, revocation is inappropriate. See Commonwealth Shipping Ltd., Cargo Carriers Ltd., Martyn C. Merritt and Mary Anne Merritt – Submission of Materially False or Misleading Statements to the Federal Maritime Commission and False Representation of Common Carrier Vessel Operations, FMC LEXIS 17 (2003). In fact, the first case brought against Sam Ghanem resulted in the jury deadlocking.

In Commonwealth Shipping, the Commission considered Martyn Merritt's sixteen year history before determining to revoke Commonwealth Shipping's license. Id. at 3-4. Over sixteen years Mr. Merritt appeared in front of the Commission three separate times relating to his continuing violation of the Commission's regulations and federal law. Id. To start, Mr. Merritt attempted to obtain transportation at less than the rates required by law, using six shell corporations to conceal his violations. Ariel Maritime Group, Inc., 24 S.R.R. 517 (1987). In response, the Commission issued a cease and desist order. Id. After continuing to violate the same rates regulations for the next eight years, the Commission again issued a cease and desist order. Martyn Merritt, AMG Services, Inc. et al., 27 S.R.R. 142 (1995). Meanwhile, Mr. Merritt was also convicted for conspiracy to commit fraud, for which he was sentenced to 5 years in prison and a \$936,000 fine. United States v. Merritt, 988 F.2d 1298 (2d. Cir.), cert. denied, 508 U.S. 961 (1993). At the heart of Mr. Merritt's crime, he agreed to ship and deliver high quality powdered milk to Sudan, but instead, supplied a product used in animal feed and unfit for human consumption. Id.; See also Commonwealth Shipping FMC LEXIS at 3-4. Finally, Commonwealth Shipping submitted materially misleading information on their qualifying individual application to the Commission, in an attempt to hide Mr. Merritt's control over the business. Commonwealth Shipping FMC

LEXIS at 6-9, 17. Only after the foregoing plethora of violations and criminal conduct did the Commission decide to revoke Commonwealth's license. Id. at 22.

The facts before the Commission in this case are highly distinguishable. First, Washington Movers is neither owned nor operated by Sam Ghanem. Sam Ghanem has no remaining interest in the business. Also, to the extent that Sam Ghanem's conduct peripherally related to Washington Movers, revocation is inappropriate. Pursuant to its own precedent, the Commission reserves revocation only for the most egregious circumstance, in which licensees demonstrate no intent of future compliance. Sam Ghanem's criminal conviction arose out of a sting operation in which an FBI informant asked Sam Ghanem to undertake a shipment. The shipment never occurred. Washington Movers has no prior history of any violations and Sam Ghanem, himself, has no other history of violations.

Washington Movers, under Norma Ghanem, is committed to respecting the Commission's regulations and complying therewith. Washington Movers should not be rendered impotent because of the independent conduct of Sam Ghanem, effectively a third party removed from any of Washington Movers operations.

III. Washington Mover's Untimely Notification of Its Name Change Does Not Warrant Revocation of Its License

On November 7, 2008, Washington Movers changed its name from Washington Movers, Inc. to Washington Movers International, Inc. Pursuant to 46 CFR 515.18 (a)(5) the Commission must approve licensees' name changes. As referenced above, contemporaneously with this reply, Washington Movers has submitted the appropriate FMC-18 forms to seek the Commission's approval of its name change.

Prior decisions have held that revoking or suspending an OTI license should be limited to the most egregious circumstances, including materially misrepresenting information regarding their

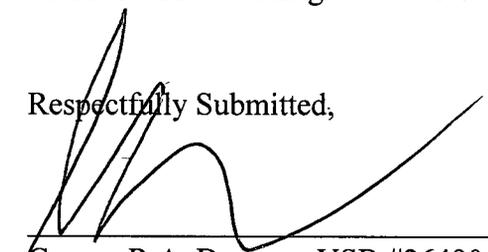
qualifications. In the Matter of Ocean Transportation License in the Name of Apparel Logistics, Inc., Petition for Appeal from Staff Action or in the Alternative for Initiation of an Investigation, 30 S.R.R. 567, 570 (FMC 2004); see also Stallion Cargo, Inc. - Possible Violations of Sections 10(a)(1) and 10 (b) (1) of the Shipping Act of 1984, 29 S.R.R. 665, 683-84 (FMC 2001).

Washington Movers untimely notification of its name change is neither egregious nor a material misrepresentation of its qualifications. Washington Movers has generally continued business under the same name and there was and is no risk of any confusion. Washington Movers name change had no effect on its qualifications as an ocean transport intermediary and should play no role in the Commissions' decision related to Washington Movers' License.

Give the foregoing, the Commission should not revoke Washington Movers' License.

DATED: November 2, 2015

Respectfully Submitted,



George R.A. Doumar, VSB #26490

Raj H. Patel, VSB #87893

Doumar Martin PLLC

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Arlington, Virginia 22201

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EXHIBIT 1

Stock Transfer Agreement

This Transfer Agreement is entered into as of this 31st 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.

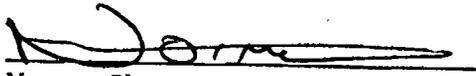
2. The Transferor hereby transfers his entire ownership interest in the Corporation, consisting of 1000 shares, to the Transferee, in exchange for One Hundred Dollars (\$100).

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.

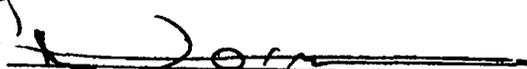
TRANSFEEE

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.

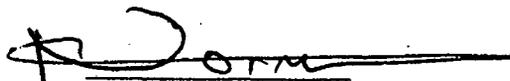
RESOLVED FURTHER: That Norma Ghanem is appointed as the sole officer (President, Secretary and Treasurer) and director of the Corporation.

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 Reply to Order to Show Cause 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
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Raj H. Patel, VSB No. 87893
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