



May 26, 2017

**BY HAND DELIVERY**

Administrator, USDA, AMS  
c/o NOP Appeals Staff  
1400 Independence Avenue, SW  
Room 2095-S, STOP 0203  
Washington, DC 20250

Re: Hakan Organics DMCC's Appeal of the Combined Notice of Non-Compliance and Proposed Revocation of Certification

To Whom It May Concern:

I write to confirm that John H. Fuson of Crowell & Moring LLP, 1001 Pennsylvania Ave., NW, Washington, DC 20004, is authorized to represent Hakan Organics DMCC ("Hakan Organics") in its appeal of the Combined Notice of Non-Compliance and Proposed Revocation of Certification (the "Notice") issued by the United States Department of Agriculture ("USDA") Agricultural Marketing Service ("AMS") on April 28, 2017.

If you have any questions about the appeal, please do not hesitate to contact Mr. Fuson at (202) 624-2910 or [jfuson@crowell.com](mailto:jfuson@crowell.com)

With best regards,

(b) (6)





John H. Fuson  
(202) 624-2910  
JFuson@crowell.com

May 30, 2017

**BY HAND DELIVERY AND E-MAIL**

Administrator, USDA, AMS  
c/o NOP Appeals Staff  
1400 Independence Avenue, SW  
Room 2095-S, STOP 0203  
Washington, DC 20250

Re: Hakan Organics DMCC's Appeal of the Combined Notice of Non-Compliance and Proposed Revocation of Certification

To Whom It May Concern:

I write on behalf of Hakan Organics DMCC ("Hakan Organics") in response to the Combined Notice of Non-Compliance and Proposed Revocation of Certification (the "Notice")<sup>1</sup> issued by the United States Department of Agriculture ("USDA") Agricultural Marketing Service ("AMS") on April 28, 2017.<sup>2</sup>

The Notice alleges violations of the Organic Foods Production Act of 1990, as amended (7 U.S.C. §§ 6501-6522) ("OFPA"), perpetrated by Beyaz Agro. Beyaz Agro, which the Notice indicates is based in Gazientep, Turkey, is an entirely distinct entity from Hakan Organics as evidenced, for example, by USDA records that show it holds its own organic certifications.

Indeed, Hakan Organics has no relationship with or control over Beyaz Agro, and Beyaz Agro is not authorized to act as agent for Hakan Organics. Hakan Organics therefore appeals the action directed by the Notice and urges the Administrator to find that revocation of Hakan Organics' organic certification for conduct committed by Beyaz Agro is unwarranted.

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<sup>1</sup> The USDA Notice was addressed to Hakan Bahceci, whom it identifies as the CEO of Hakan Organics. As a point of clarification, Mr. Bahceci is CEO of Hakan Organics' parent company, Hakan Agro DMCC.

<sup>2</sup> In e-mail correspondence dated May 22, 2017, Betsy Rakola, the Compliance and Enforcement Director of the National Organic Program, agreed that, due to the Memorial Day Holiday, USDA would accept Hakan Organics' response if filed on or before May 30, 2017.

## **Background**

Hakan Organics is a subsidiary of Hakan Agro DMCC, which operates a network of warehouses, processing and logistics facilities to support supply chains of agricultural commodities throughout the world. Hakan Agro Group is headquartered in Dubai, United Arab Emirates. Through its subsidiaries and partners, it handles distribution of both conventional and organic agricultural products.

Hakan Organics is a USDA-certified organic handler (NOP ID: 1202388600). It received certification on October 2, 2015 from Kiwa BCS Oko Garantie GmbH. It is certified to handle various grain products including barley, chickpeas and durum wheat.

In February 2014, Hakan Organics entered into an agreement with Goksal Beyaz, a Turkish citizen, to open a Hakan Organics satellite operation in the Republic of Turkey. Hakan Organics selected Mr. Beyaz based on his represented ability to handle organic agricultural products in compliance with the laws of the countries where he did business, including in the United States.

Hakan Organics' agreement with Mr. Beyaz entrusted him to execute certain transactions on behalf of Hakan Organics in Turkey. Unfortunately, as evidenced by the allegations in the Notice and findings made during Hakan Organics' internal investigation into those allegations, that trust was grossly misplaced. On April 28, 2017, immediately upon learning of the misconduct alleged in the Notice, Hakan Organics terminated its relationship with Mr. Beyaz.

As the Notice alleges, Mr. Beyaz operated his own business in Turkey called Beyaz Agro. Publicly available USDA records indicate that, at the time the shipment described in the Notice was handled and delivered by Beyaz Agro, it held two separate USDA organic certifications: a handling certification for various grains effective as of August 16, 2016 (NOP ID: 1202545700); and a handling certification for barley, corn, hay, pasta, semolina, soy meal pellets, soy oil and wheat effective as of October 1, 2016 (NOP ID 1780847886). Those records also show that Beyaz Agro subsequently secured two additional organic certifications: a handling certification for chickpeas, legumes and pulses, effective as of December 2, 2016 (NOP ID: 1202545701); and a handling certification for chickpeas, legumes, lentils and pulses, also effective as of December 2, 2016 (NOP ID: 1202545702). The Notice alleges that Beyaz Agro acquired conventional agricultural products and used its USDA organic certification to obtain organic transaction certificates for those products, which it then sold as organic.

## **Statement of Facts**

In the Notice, USDA alleges that the following acts occurred with respect to a shipment of 16,250 metric tons of soybeans, which had been fumigated with aluminum phosphide in violation of the OFPA, and which arrived in the United States aboard the M/V "Four Diamond" on November 12, 2016:

1. “**Bevaz Agro**, in Turkey, applied to accredited certifying agent Kiwa-BCS for organic transaction certificates.” (Notice, p.3).
2. “**Bevaz Agro** gave Kiwa-BCS false information about the soybeans.” (*Id.* p.3).
3. “**Bevaz Agro**[ ] presented incomplete and false information to its organic certifying agent to obtain an organic transaction certificate for the load of fumigated Ukrainian soybeans to be shipped on M/V “Four Diamond.” (*Id.* p.4).
4. “[**Bevaz Agro**] provided two certificates of inspection that were issued by bio.inspect AG, a USDA-accredited certifier, which identified Russia as the country of dispatch for 26,243,840 KG of organic soybeans.” (*Id.* p.3).
5. “The marine survey certificates [**Bevaz Agro**] sent to Kiwa-BCS in the application state: ‘organic soybeans’ and had a ‘Farmer Code (Lot number) HRU-001, HRU-002,’ which matched the inventory records showing the false Russian origin in the transaction certificate request.” (*Id.* p.5).
6. “When applying to Kiwa-BCS, **Bevaz Agro** omitted any documents that would indicate ‘Ukraine’ as the true country of origin of the soybeans, such as the Certificate of Origin or the Phytosanitary Certificate.” (*Id.* p.5).
7. “Instead, **Bevaz Agro** presented certification documents indicating the soybeans had been sourced from Russia.” (*Id.* p.5).
8. “**Bevaz Agro** copied **Goksal Bevaz** and Hakan Organics Import/Export Specialist <sup>(b) (6)</sup> on the application request.” (*Id.* p.3.)
9. “**Bevaz Agro** requested the organic transaction certificate in order to provide documentation of the organic status of products for shipment to and sale in the United States.” (*Id.* p.4).
10. “Based on the false information, Kiwa-BCS issued **Bevaz Agro** three organic transaction certificates, which listed the soybeans as organic.” (*Id.* p.3).
11. “**Bevaz Agro** used these certificates to re-export the Ukrainian soybeans to the United States as organic soybeans.” (*Id.* p.3).

12. “**Beyaz Agro** provided [Virginia-based] Agropex commercial invoices, bills of lading, and marine survey certificates that identified the soybeans as non-GMO but did not identify the soybeans as organic.” (*Id.* p.5).
13. “[**Beyaz Agro**] also provided the fraudulently obtained organic transaction certificates issued by Kiwa-BCS to represent the soybeans as certified organic.” (*Id.* p.5).

As the Notice makes clear, all of these alleged wrongful acts were committed by Beyaz Agro.

Hakan Organics can neither confirm nor deny the alleged misconduct by Beyaz Agro as it has no insight into or control over actions taken by that company. Indeed it does not have nor has it seen all the alleged fraudulent documents referenced in the Notice since Mr. Beyaz and Beyaz Agro have refused to provide Hakan Organics any documentation. Through an e-mail dated May 22, 2017 from me to Betsy Rakola, the Compliance and Enforcement Director of the National Organic Program, Hakan Organics asked USDA if it was able to provide copies of the documents. Ms. Rakola replied that the Department could not share any documents at this time.

Hakan Organics also cannot confirm what information was communicated to (b) (6). The Notice alleges that (b) (6) was copied on communications that contained false information, and that he was a Hakan Organics’ “Import/Export Specialist.” (b) (6), however, is not an employee of Hakan Organics and any representation he made to that effect was false. Hakan Organics assumes that he is an employee of Beyaz Agro in Turkey as Mr. Beyaz admitted to Hakan Organics that his employees were responsible for the misconduct. Mr. Beyaz was authorized to establish e-mail accounts under the hakanfoods domain name for use by the Turkish operation and it appears (b) (6) may have used such an account here, but (b) (6) was not an employee or agent of Hakan Organics and neither he nor anyone else shared with Hakan Organics any notice or documentation he may have received about any shipments that would indicate Beyaz Agro was falsely representing them to be organic.

### **Responses to Specific Violations**

The Notice bases its proposed actions against Hakan Organics on three enumerated violations. The violations are all premised on conduct committed by Beyaz Agro.

With respect to the specific violations alleged in the Notice, Hakan Organics responds as follows:

1. *Hakan Organics denies causing organic products to come into contact with prohibited substances or selling soybeans treated with prohibited substances as organic.*

Beyaz Agro, not Hakan Organics, was the entity that obtained certificates from the relevant authorities and re-exported the soybeans. According to the allegations in the Notice, the referenced soybeans were under the control of Beyaz Agro while in Turkey.

2. *Hakan Organics denies that Beyaz Agro was an agent authorized to act on its behalf. Any action Mr. Beyaz took on behalf of Beyaz Agro, was similarly not authorized by Hakan Organics.*

Beyaz Agro was not authorized to act for Hakan Organics, and therefore could not be its agent for any transactions. Any unlawful actions described in the Notice that were taken by Mr. Beyaz were on behalf of Beyaz Agro, not Hakan Organics.

3. *Again, Hakan Organics denies that Beyaz Agro was its agent, and thus Beyaz Agro's alleged misconduct should not be imputed to Hakan Organics.*

As alleged in the Notice (p.5), "**Beyaz Agro** provided Agropex commercial invoices, bills of lading, and marine survey certificates that identified the soybeans as non-GMO but did not identify the soybeans as organic. [**Beyaz Agro**] provided the fraudulently obtained organic transaction certificates issued by Kiwa-BCS to represent the soybeans as certified organic." (Emphasis added). Beyaz Agro is not authorized to act on behalf of Hakan Organics. It is a separately certified organic handler and its actions cannot and should not be imputed to Hakan Organics.

### **Hakan Organics' Internal Investigation**

In response to the allegations in the Notice, Hakan Organics conducted a broad internal investigation into all transactions relating to Hakan Organics' products that Mr. Beyaz was involved in. During that investigation, Mr. Beyaz informed Hakan Organics that his execution team had a similar issue with a shipment of yellow corn originating in Romania and passing through Turkey before final shipment to the United States aboard the M/V "Crisis" in January 2017. Hakan Organics has since been in touch with the buyer of the corn to ensure that accurate information about the shipment is conveyed and that appropriate corrective actions are taken.

## Discussion

USDA proposes to revoke Hakan Organics' certification as an organic handler based entirely on conduct perpetrated by a separate certified organic handler, Beyaz Agro and its owner, Goksal Beyaz. Such a result would be extreme and is not warranted in this case because Beyaz Agro was not an agent of Hakan Organics. According to the facts USDA asserts in the Notice and summarized above, the soybeans from Ukraine that entered Turkey were not represented as organic by Hakan Organics or anyone else. Rather, only once they were in Turkey and entirely within the control of Beyaz Agro did Beyaz Agro engage in the activity alleged in the Notice that led to issuance of the fraudulent organic transaction certificates. Beyaz Agro represented that the shipment that left Turkey was organic, using the certifications it fraudulently obtained from a USDA-accredited certifying agent. Agropex operated in good faith reliance on the organic transaction certificates, having no reason, at that time, to doubt their validity.

Although Hakan Organics partnered with Mr. Beyaz to open satellite operations in Turkey and granted Mr. Beyaz authority to take certain actions on its behalf, it had no such agreement with Beyaz Agro, which is a wholly independent entity that is not affiliated with Hakan Organics. Beyaz Agro has been separately certified by USDA-accredited organic certifiers covering its operations in Turkey. Hakan Organics has no control over those operations. When confronted by Hakan Organics during its investigation into the allegations in the Notice, Mr. Beyaz admitted his responsibility for the actions of Beyaz Agro, which were outside any authority granted by Hakan Organics.

The only evidence the Notice offers that Hakan Organics had knowledge of the fraudulent representations Beyaz Agro made to the USDA-accredited certifying agent is an e-mail sent by Beyaz Agro to Mr. Beyaz and (b) (6). The Notice asserts that (b) (6) was a "Hakan Organics Import/Export Specialist," but, as explained above (b) (6) is not an employee of Hakan Organics.

## Conclusion

Hakan Organics understands its responsibilities as a certified organic operation and both regrets and is deeply troubled that its name and reputation may have been misused by a rogue actor to represent conventional crops as organic. It has undertaken a thorough review of its own internal controls and its external partners to ensure that Hakan Organics and all individuals it works with are fully compliant with all applicable laws. Hakan Organics is focusing especially on its verification programs to ensure that it avoids future entanglements with other bad actors. The conduct described in the Notice, however, was committed by Beyaz Agro, which is not Hakan Organics and was not authorized as its agent.

Hakan Organics certainly will not conduct business with Mr. Beyaz or Beyaz Agro again. As it separates itself from that relationship, however, it asks the Administrator to recognize that

Administrator, USDA, AMS  
May 30, 2017  
Page 7

Hakan Organics is not Beyaz Agro, and despite the unfortunate and now terminated relationship with Mr. Beyaz, that USDA cannot and should not revoke Hakan Organics' organic certification on account of Beyaz Agro's misconduct.

If the Administrator or USDA has any questions, Hakan Organics would welcome the opportunity to answer them and to discuss its investigation and the steps it has taken to protect the integrity of its organic operations going forward.

Respectfully submitted,

(b) (6)

A large black rectangular redaction box covers the signature area. The text "(b) (6)" is written in red at the top left corner of the redaction.

John H. Fuson

Enclosure



1400 Independence Ave. SW  
Room 2648-S, STOP 0268  
Washington, D.C. 20250

May 30, 2017

John H. Fuson  
Crowell & Moring LLP,  
1001 Pennsylvania Ave., NW,  
Washington, DC 20004  
Transmittal by email: [jfuson@crowell.com](mailto:jfuson@crowell.com)

**Re: Appeal Acknowledgement, APL-033-17**

Dear Mr. Fuson:

This letter acknowledges Hakan Organics DMCC's appeal of the Combined Notice of Non-Compliance and Proposed Revocation of Certification issued on April 28, 2017 by the National Organic Program. Your appeal on behalf of Hakan Organics DMCC has been received by the Agricultural Marketing Service and will be reviewed and decided by persons not involved with the action being appealed.

We invite you and/or your client to provide the Appeals Team with any additional information you believe would support your case **within 10 days of receipt of this letter**. Control Number APL-033-17 has been assigned to this appeal. Please use this number on all correspondence. All written communications related to this appeal must be sent to the address above by a delivery service which provides dated receipts. Alternatively, you may use email; the Appeals Inbox is: [NOPAppeals@ams.usda.gov](mailto:NOPAppeals@ams.usda.gov).

During the appeals process, Hakan Organics DMCC's organic certification remains valid. As such, the company must remain in full compliance with the USDA organic regulations, and will continue to operate under the oversight of its organic certifying agent. Please note that your client may file additional appeals if it receives any additional adverse action notices.

Sincerely,

A handwritten signature in dark ink that reads "Jennifer Tucker". The signature is written in a cursive, flowing style.

Jennifer Tucker, Ph.D.  
Associate Deputy Administrator  
National Organic Program  
(202) 720-3252  
[NOPAppeals@ams.usda.gov](mailto:NOPAppeals@ams.usda.gov)

Cc: NOP C&E Division

**From:** Tucker, Jennifer - AMS  
**To:** [JFuson@crowell.com](mailto:JFuson@crowell.com)  
**Cc:** [Betsy.Rakola@ams.usda.gov](mailto:Betsy.Rakola@ams.usda.gov); [NOPAppeals@ams.usda.gov](mailto:NOPAppeals@ams.usda.gov)  
**Subject:** Acknowledgement of Appeal - Hakan Organics DMCC (APL-033-17)  
**Date:** Tuesday, May 30, 2017 2:27:58 PM  
**Attachments:** [Ack-Hakan-APL-033-17.pdf](#)  
[regdata.txt](#)

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Dear Mr. Fuson - Attached please find a letter acknowledging Hakan Organics DMCC's appeal of the April 28, 2017, Combined Notice of Noncompliance and Notice of Proposed Revocation received from the National Organic Program. The letter describes next steps – please let me know if you have any questions. You can learn more about the appeals process at: [4011: Adverse Action Appeal Process](#).

Best -  
Jenny Tucker

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Jennifer Tucker, Ph.D.  
Associate Deputy Administrator  
USDA Agricultural Marketing Service  
National Organic Program  
Phone: (202) 720-3252  
[Jennifer.Tucker@ams.usda.gov](mailto:Jennifer.Tucker@ams.usda.gov)

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**From:** Fuson, John [mailto:[JFuson@crowell.com](mailto:JFuson@crowell.com)]  
**Sent:** Tuesday, May 30, 2017 11:47 AM  
**To:** AMS - NOPAppeals <[NOPAppeals@ams.usda.gov](mailto:NOPAppeals@ams.usda.gov)>  
**Cc:** Rakola, Betsy - AMS (OCIO) <[Betsy.Rakola@ams.usda.gov](mailto:Betsy.Rakola@ams.usda.gov)>  
**Subject:** Hakan Organics DMCC

To the National Organic Program Appeals Staff:

Please find attached a letter responding to and appealing the Combined Notice of Non-Compliance and Proposed Revocation of Certification (the "Notice") issued on April 28, 2017 by the United States Department of Agriculture Agricultural Marketing Service to Hakan Organics DMCC. Also attached are a copy of the Notice and a letter from Hakan Organics authorizing me as their representative, should you require it for your records.

Courtesy copies of these documents will be hand-delivered to you today at 1400 Independence Avenue, SW, Room 2095-S, STOP 0203, Washington, DC 20250, per the instructions in the Notice.

Thank you for your time and consideration of this matter. Should you have any questions about this response, please do not hesitate to contact me.

With best regards,

John H. Fuson

[jfuson@crowell.com](mailto:jfuson@crowell.com)

Direct 1.202.624.2910 | Fax: 1.202.628.5116

**Crowell & Moring LLP** | [www.crowell.com](http://www.crowell.com)

1001 Pennsylvania Avenue NW

Washington, DC 20004

## Coffey, Danyele (CTR) - AMS

---

**From:** Tucker, Jennifer - AMS  
**Sent:** Wednesday, August 02, 2017 1:39 PM  
**To:** Fuson, John  
**Cc:** AMS - NOPAppeals; Bell, Lauren; Rakola, Betsy - AMS  
**Subject:** Acknowledgement of Request for Hearing - Hakan Organics (APL-033-17) (Sent Registered)  
**Attachments:** Hearing-Ack-APL-033-17.pdf

Dear Mr. Fuson – Attached is a letter acknowledging your Request for Hearing on behalf of Hakan Organics DMCC. The letter accepts the request for hearing and outlines next steps.

Thank you –  
Jenny

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**From:** Fuson, John [mailto:JFuson@crowell.com]  
**Sent:** Tuesday, August 1, 2017 2:35 PM  
**To:** Tucker, Jennifer - AMS  
**Cc:** AMS - NOPAppeals ; Bell, Lauren  
**Subject:** RE: Appeal Decision - Hakan Organics (APL-033-17)

Dear Dr. Tucker,

Please see the enclosed cover letter and form requesting a hearing. A hard copy will be hand delivered to your office. If you have any questions concerning this request, please let me know.

With best regards,

John H. Fuson  
[jfuson@crowell.com](mailto:jfuson@crowell.com)  
Direct 1.202.624.2910 | Fax: 1.202.628.5116

**Crowell & Moring LLP** | [www.crowell.com](http://www.crowell.com)  
1001 Pennsylvania Avenue NW  
Washington, DC 20004

---

**From:** Tucker, Jennifer - AMS [mailto:Jennifer.Tucker@ams.usda.gov]  
**Sent:** Wednesday, July 5, 2017 2:36 PM  
**To:** Fuson, John  
**Subject:** Appeal Decision - Hakan Organics (APL-033-17)

Dear Mr. Fuson – Attached please find a cover letter, Appeal Decision from the AMS Administrator, and Hearing Forms, all pertaining to appeal APL-033-17 – Hakan Organics DMCC’s appeal of the April 28, 2017, Combined Notice of Noncompliance and Notice of Proposed Revocation received from the National Organic Program. If your client wishes to request or waive a Hearing, please complete the appropriate form attached and send to [NOPAppeals@ams.usda.gov](mailto:NOPAppeals@ams.usda.gov) or to me directly via reply email.

Thank you –  
Jenny Tucker

-----  
Jennifer Tucker, Ph.D.  
Associate Deputy Administrator  
USDA Agricultural Marketing Service  
National Organic Program  
Phone: (202) 720-3252  
[Jennifer.Tucker@ams.usda.gov](mailto:Jennifer.Tucker@ams.usda.gov)

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1400 Independence Ave. SW  
Room 2648- South, STOP 0268  
Washington, D.C. 20250

August 2, 2017

John H. Fuson  
Crowell & Moring LLP  
1001 Pennsylvania Ave., NW  
Washington, DC 20004  
Transmittal by email: [jfuson@crowell.com](mailto:jfuson@crowell.com)

**RE: APL-033-17; Hearing Acknowledgement**

Dear Mr. Fuson:

This is to acknowledge that Hakan Organics DMCC's request for an administrative hearing was filed in a timely manner when it was received by the NOP Appeals Team on August 1, 2017. No further action is required on your part. You will be notified in writing by the USDA hearing clerk's office when the hearing is scheduled.

The hearing will be conducted pursuant to the USDA's Uniform Rules of Practice, 7 C.F.R. Part 1, Subpart H (<http://www.oaljdecisions.dm.usda.gov/rules>). The hearing will be held in the United States. Copies of the documents, exhibits and references available to the AMS Administrator during the appeal process will be made available to you once the hearing before the USDA Administrative Law Judge has been scheduled.

Please visit our website at: <http://www.ams.usda.gov/nop> for a copy of both the USDA organic regulations and the Organic Foods Production Act.

Sincerely,

A handwritten signature in dark ink that reads "Jennifer Tucker". The signature is written in a cursive, flowing style.

Jennifer Tucker  
Associate Deputy Administrator  
National Organic Program

Cc: Compliance and Enforcement Division

## Coffey, Danyele (CTR) - AMS

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**From:** Tucker, Jennifer - AMS <Jennifer.Tucker@ams.usda.gov>  
**Sent:** Tuesday, July 18, 2017 10:11 AM  
**To:** jfusion@crowell.com  
**Subject:** Follow-up: Appeal Decision - Hakan Organics (APL-033-17)  
**Attachments:** HearingForms.Hakan.APL-033-17.pdf; Decision-Cover-APL-033-17.pdf; Decision-Hakan-APL-033-17.pdf

Hi John – We are a couple of weeks into the Hearing Request period for your client, Hakan, so I wanted to check in, as I have not yet received a Request or Waiver for Hearing. Please let me know if you have any questions about the materials below/attached.

Best –  
Jenny

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**From:** Tucker, Jennifer - AMS  
**Sent:** Wednesday, July 5, 2017 2:36 PM  
**To:** 'Fuson, John'  
**Subject:** Appeal Decision - Hakan Organics (APL-033-17)

Dear Mr. Fuson – Attached please find a cover letter, Appeal Decision from the AMS Administrator, and Hearing Forms, all pertaining to appeal APL-033-17 – Hakan Organics DMCC's appeal of the April 28, 2017, Combined Notice of Noncompliance and Notice of Proposed Revocation received from the National Organic Program. If your client wishes to request or waive a Hearing, please complete the appropriate form attached and send to [NOPAppeals@ams.usda.gov](mailto:NOPAppeals@ams.usda.gov) or to me directly via reply email.

Thank you –  
Jenny Tucker

-----  
Jennifer Tucker, Ph.D.  
Associate Deputy Administrator  
USDA Agricultural Marketing Service  
National Organic Program  
Phone: (202) 720-3252  
[Jennifer.Tucker@ams.usda.gov](mailto:Jennifer.Tucker@ams.usda.gov)

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**Request for Hearing**

THIS REQUEST FOR HEARING is submitted by Hakan Organics DMCC to the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS).

In signing this Hearing Request, Hakan Organics DMCC acknowledges and agrees to the following:

1. The Secretary has jurisdiction in this matter.
2. Hakan Organics DMCC has been given the opportunity for a hearing and requests a hearing pursuant to the USDA's Uniform Rules of Practice, 7 C.F.R. Part 1, Subpart H.
3. Hakan Organics DMCC understands that failure to return this Hearing Request is deemed a waiver of hearing and in doing so, accepts the decision of the AMS Administrator established in APL-033-17.

\_\_\_\_\_  
Hakan Organics DMCC

Date: \_\_\_\_\_

**Waiver of Hearing**

THIS WAIVER OF HEARING is submitted by Hakan Organics DMCC to the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS).

In signing this waiver, Hakan Organics DMCC acknowledges and agrees to the following:

1. The Secretary has jurisdiction in this matter.
2. Hakan Organics DMCC has been given the opportunity for a hearing and waives such hearing and further procedure.
3. Hakan Organics DMCC accepts the decision of the AMS Administrator established in APL-033-17.

\_\_\_\_\_  
Hakan Organics DMCC

Date: \_\_\_\_\_



1400 Independence Ave. SW  
Room 2607-S, STOP 0262  
Washington, D.C. 20250

John H. Fuson  
Crowell & Moring LLP  
1001 Pennsylvania Ave., NW  
Washington, DC 20004  
Transmittal by email: [jfuson@crowell.com](mailto:jfuson@crowell.com)

JUL 5 2017

**RE: APL-033-17; National Organic Program Appeal Denied**

Dear Mr. Fuson:

The evaluation of Hakan Organics DMCC appeal of the April 28, 2017, Combined Notice of Noncompliance and Proposed Revocation received from the National Organic Program (NOP) has concluded. The United States Department of Agriculture (USDA) Agricultural Marketing Service (AMS) Administrator has issued a decision denying your client's appeal. A copy of the Administrator's Decision is enclosed.

Hakan Organics DMCC is entitled to a hearing before an USDA Administrative Law Judge as allowed by the USDA organic regulations at 7 CFR 205.681(a)(2). If you choose this option, the Department will initiate the hearing, and it will be conducted according to the USDA's Uniform Rules of Practice, 7 CFR, Part 1, Subpart H. The hearing will be held in the United States. If your client would like to request this hearing, please sign and return the enclosed "Request for Hearing" form.

Alternatively, Hakan Organics DMCC may waive a hearing and accept the decision of the AMS Administrator. If your client would like to waive the hearing, please sign and return the enclosed "Waiver of Hearing" form. If your client does this, Hakan Organics DMCC waives the opportunity for a hearing and accepts the decision of the AMS Administrator in its entirety.

For more information, please review the appeal decision and forms enclosed.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Sheats".

Michael Sheats  
National Organic Program Appeals Program  
Division Director, Agriculture Analytics Division  
Livestock, Poultry, and Seed Programs  
Agricultural Marketing Service

cc: National Organic Program

Enclosures: Administrator's Decision; Request for Hearing Form, Waiver of Hearing Form

**APPEALS CLEARANCE SHEET**  
**Administrator's Decision**

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**Certifying Agent:** NOP Adverse Action (Notice of Noncompliance and Proposed Revocation)  
**Appellant:** Hakan Organics DMCC

---

**Associate Deputy Administrator, National Organic Program**

\_\_\_\_\_ Approved

\_\_\_\_\_ (signature & date)

Jennifer Tucker

**Deputy Administrator, National Organic Program**

\_\_\_\_\_ Approved

\_\_\_\_\_ Minor Edits

\_\_\_\_\_ Substantive Disagreement

\_\_\_\_\_ (signature & date)

Miles V. McEvoy

**Division Director, Agricultural Analytics Division,**  
**AMS Livestock, Poultry and Seed Program**

\_\_\_\_\_ Approved

\_\_\_\_\_ Minor Edits

\_\_\_\_\_ Substantive Disagreement

\_\_\_\_\_ (signature & date)

Michael Sheats

**AMS Acting Administrator**

\_\_\_\_\_ Approved

\_\_\_\_\_ Minor Edits

\_\_\_\_\_ Substantive Disagreement

\_\_\_\_\_ (signature & date)

Bruce Summers

**APPEALS CLEARANCE SHEET**  
**Administrator's Decision**

---

**Certifying Agent:** NOP Adverse Action (Notice of Noncompliance and Proposed Revocation)  
**Appellant:** Hakan Organics DMCC

---

**Associate Deputy Administrator, National Organic Program**

Approved

Jennifer Tucker 6.20.17 (signature & date)  
Jennifer Tucker

**Deputy Administrator, National Organic Program**

Approved  
 Minor Edits  
 Substantive Disagreement

Jennifer Tucker FOR MVM - approved by email 6.20.17 (signature & date)  
Miles V. McEvoy

**Division Director, Agricultural Analytics Division,  
AMS Livestock, Poultry and Seed Program**

Approved  
 Minor Edits  
 Substantive Disagreement

Michael Sheats 6/21/17 (signature & date)  
Michael Sheats

**AMS Acting Administrator**

Approved  
 Minor Edits  
 Substantive Disagreement

see signed decision 7/5/17 (signature & date)  
Bruce Summers

# APPEALS CLEARANCE SHEET

## Case Summary

**Certifying Agent:** NOP Adverse Action (Notice of Noncompliance and Proposed Revocation)  
**Appellant:** Hakan Organics DMCC

### Associate Deputy Administrator, National Organic Program

Approved

Jennifer Tucker 6.13.17 (signature & date)

Jennifer Tucker Updated w/ 6.14.17 meeting info.

### Deputy Administrator, National Organic Program

Approved

Minor Edits

Substantive Disagreement

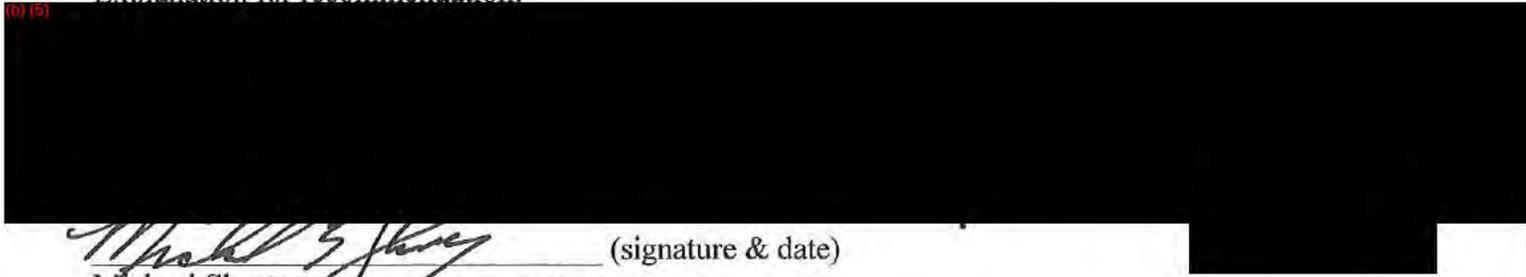
Miles V. McEvoy 6/14/17 (signature & date)

### Division Director, Agricultural Analytics Division, AMS Livestock, Poultry and Seed Program

Recommendation to Administrator:

<input checked="" type="checkbox"/>	Deny Appeal – Uphold NOP Decision
<input type="checkbox"/>	Sustain Appeal – Support Operator Appeal
<input type="checkbox"/>	Settlement Offer
<input type="checkbox"/>	Close without a Decision
<input type="checkbox"/>	Other:

Explanation for recommendation:



Michael Sheats 6/20/2017 (signature & date)

# APPEALS CLEARANCE SHEET

## Case Summary

---

**Certifying Agent:** NOP Adverse Action (Notice of Noncompliance and Proposed Revocation)  
**Appellant:** Hakan Organics DMCC

---

**Associate Deputy Administrator, National Organic Program**

\_\_\_\_\_ Approved

\_\_\_\_\_ (signature & date)  
Jennifer Tucker

**Deputy Administrator, National Organic Program**

\_\_\_\_\_ Approved  
\_\_\_\_\_ Minor Edits  
\_\_\_\_\_ Substantive Disagreement

\_\_\_\_\_ (signature & date)  
Miles V. McEvoy

**Division Director, Agricultural Analytics Division,  
AMS Livestock, Poultry and Seed Program**

Recommendation to Administrator:

<input type="checkbox"/>	Deny Appeal – Uphold NOP Decision
<input type="checkbox"/>	Sustain Appeal – Support Operator Appeal
<input type="checkbox"/>	Settlement Offer
<input type="checkbox"/>	Close without a Decision
<input type="checkbox"/>	Other:

Explanation for recommendation:

\_\_\_\_\_ (signature & date)  
Michael Sheats



# National Organic Program (NOP) Appeal APL-033-17

**Appellant:**

**Hakan Organics DMCC  
Dubai, United Arab Emirates**

**Represented by  
John H. Fuson  
Crowell & Moring LLP,  
1001 Pennsylvania Ave., NW,  
Washington, DC 20004**

**NOP ADVERSE ACTION**

**→ PLEASE RETURN TO NOP:  
(202) 720-3252**

<b>Reviewed by:</b>	<b>Initials and Date</b>	<b>Initials and Date</b>
NOP Deputy Administrator		
Division Director, Agricultural Analytics Division, Livestock and Seed Program		
AMS Administrator		

UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM  
COMPLIANCE & ENFORCEMENT BRANCH

REPORT OF INVESTIGATION

Operator Name & Address: Hakan Organics DMCC, Hakan Bahceci, CEO, 34<sup>th</sup> Floor, Tower BB2 Mazaya Business Avenue, Jemeirah Lakes Towers (JLT), Sheikh Zayed Rd., PO Box 31489, Dubai, United Arab Emirates, [Hakan.Bahceci@hakanfoods.com](mailto:Hakan.Bahceci@hakanfoods.com)

Accredited Certifying Agent Name & Address: Kiwa BCS Oko Garantie GmbH, Marientorgraben 3-5 90402 Nürnberg, Germany

Date of Complaint: June 7, 2016 and other dates

Allegations/Non-compliance: Conventional grains from Turkey entering in the United States and being represented as organically produced and handled

Relevant Regulations:

*7 C.F.R. §205.272: The handler of an organic handling operation must implement measures necessary to ... protect organic products from contact with prohibited substances.*

*7 U.S.C. § 6519(c)(2): Any operation that makes a false statement under this chapter to the Secretary, a governing State official, or a certifying agent shall be punished in accordance with section 1001 of title 18.*

*7 C.F.R. §205.100(c)(1): Any operation that: (1) Knowingly sells or labels a product as organic, except in accordance with the Act, shall be subject to a civil penalty of not more than the amount specified in § 3.91(b)(1) of this title per violation.; and*

*7 C.F.R. §205.105 (a): To be sold or labeled as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)),” the product must be produced and handled without the use of synthetic substances and ingredients, except as provided in §205.601 or §205.603.*

Date of Report: April 28, 2017

Compliance Specialist: Andrew Regalado

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- IV. FINDINGS OF FACTS
- V. CONCLUSION
- VI. RECOMMENDATION

EXHIBITS:

- 1. Goksal Beyaz Business Cards
- 2. Ukraine Phytosanitary Certificate 75-15-036- BX-500973
- 3. Ukraine Phytosanitary Certificate 75-14-040 BX
- 4. Ukraine Phytosanitary Certificate 75-15-010 BX-468423083763
- 5. Ukraine Phytosanitary Certificate 60-15-6054-XX-1811135
- 6. Turkish Phytosanitary Certificate EC-TR B0140061
- 7. Turkish Phytosanitary Certificate ECTR B 0140369 (Hold 1)
- 8. Turkish Phytosanitary Certificate ECTR B 0140368 (Hold 3)
- 9. Turkish Phytosanitary Certificate ECTR B 0140367 (Hold 5)
- 10. MinFal Confirmation
- 11. SSUFSCP Validation Letter April 21, 2017
- 12. Application for Transaction Certificates BCS
- 13. Bio Inspecta Certificate HR-023-16
- 14. Bio Inspecta Certificate HR-024-16

15. Commercial Invoices Bills of Lading and Marine Survey Certificates TC Application
16. BCS Kiwa Transaction Certificate DE-25457-25
17. BCS Kiwa Transaction Certificate DE-25457-26
18. BCS Kiwa Transaction Certificate DE-25457-27
19. Commercial Invoices Bills of Lading and Marine Survey Certificates Agropex
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21. DE-25457-25 DE-25457-26 DE-25457-27 Agropex
22. Four Diamond Purchase-Sales Contract Agropex
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24. Bills of Lading and Marine Survey Certificates Global Natural
25. Turkish Phytosanitary Certificates Global Natural
26. Certificates of Origin Chamber of Commerce Gaziantep, Turkey Global Natural
27. DE-25457-25 DE-25457-26 DE-25457-27 Global Natural
28. Trade Agency Agreement (Hakan Organics and Global Natural)
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## REPORT OF INVESTIGATION

### I. INTRODUCTION

The Compliance & Enforcement (C&E) Branch of the National Organic Program (NOP) is responsible for investigating complaints filed under the Organic Foods Production Act of 1990 (OFPA) (7 USC 6501 et seq.) and its related laws and regulations.

### II. ALLEGATION

The NOP received complaints that various companies were importing non-organic grains and oilseeds from Turkey, which they then fraudulently sold as organic in the United States.

### III. INVESTIGATIVE SUMMARY

NOP Compliance & Enforcement conducted an investigation, including two site visits conducted by NOP staff, first by Andrew Regalado, Mark Bradley, and Vella Holmes at Agropex in Broadway, Virginia on March 16, 2017, and second by Mark Bradley and Vella Holmes on April 13, 2017 at Global Natural in Annapolis, Maryland.

The NOP investigation revealed that Hakan Organics DMCC (Hakan Organics), headquartered in the United Arab Emirates, and its agent, Goksal Beyaz, who serves as the General Coordinator<sup>1</sup> for Hakan Organics, acting on its behalf, violated the OFPA by selling fumigated soybeans from Ukraine in the United States while representing them as organically produced and handled.

In the course of investigating these complaints, the NOP identified violations of the USDA organic regulations involving soybean shipments managed by Hakan Organics, a certified organic grain and oilseed handling operation and two associated entities: Beyaz Agro, based in Gazientep, Turkey and Agropex International, Inc. (Agropex), Broadway, Virginia. The investigation also included Global Natural LLC, Annapolis, Maryland, a certified handler who was selling the soybeans in the U.S. under a contract with Hakan Organics. This investigation relates to a shipment of 16,250 metric tons of soybeans, which arrived in the United States aboard the M/V “Four Diamond” on November 12, 2016. The soybeans had been previously exported from Ukraine to Turkey and were then re-exported from Turkey to the United States. However, before leaving Ukraine, the soybeans had been fumigated with aluminum phosphide. Aluminum phosphide is a prohibited substance under the USDA organic regulations. Upon arrival in the United States, the fumigated soybeans were sold as USDA organic. This action violates the OFPA and the USDA organic regulations.

### IV. FINDINGS OF FACT

---

<sup>1</sup> As evidenced by business cards provided by the Hakan Organics DMCC booth to USDA NOP personnel at the BioFach trade show in Nuremberg, Germany in February 2017 (Exhibit 1)

## **Phytosanitary Certificates**

Between March and October, 2016, Hakan Organics, under Hakan Agro DMCC, an uncertified handler, imported soybeans in bulk into Turkey from four exporters in Ukraine, under four Ukrainian phytosanitary certificates: 75/15-036/BX-500973 (31 March 2016); 75/14-040/BX-083763 (08 May 2016); 75/15-010/BX-468423 (04 May 2016); and 60/15-6054/XX-181135 (08 October 2016). The Ukrainian phytosanitary certificates show that each of the four shipments of soybeans was fumigated with aluminum phosphide, a prohibited substance under the USDA organic regulations. The phytosanitary certificates clearly identified Ukraine as the country of origin for the soybeans. Hakan Agro DMCC was identified on the phytosanitary certificates as the consignee in Turkey and therefore is a responsible, notified party. (Exhibit 2, 3, 4, 5)

The soybeans in bulk from the four shipments were consolidated under one phytosanitary certificate issued by the Turkish authorities, No: EC/TR B 0140061 dated October 27, 2016. Block 10 of Turkish certificate EC/TR B 0140061 referenced the four-phytosanitary certificates issued by Ukraine. (Exhibit 6)

On November 4, 2016, the Turkish government issued separate phytosanitary certificates, No: 0140369, No: 0140368, and No: 0140367 for holds 1, 3, and 5 respectively. Each of these phytosanitary certificates had an attachment that included the statement "This phytosanitary certificate is issued instead of phytosanitary certificate No: EC/TR B 0140061" to link the certificate to the preceding certificate. The consolidated loads of bulk soybeans were re-exported to the United States in a single shipment aboard bulk carrier M/V "Four Diamond" in Holds 1, 3, and 5. (Exhibit 7, 8, 9) The USDA Foreign Agricultural Service confirmed the authenticity of the phytosanitary certificates with the issuing governments:

- On April 10, 2017, the Turkish Ministry of Food, Agriculture, and Livestock confirmed that the Ukrainian phytosanitary certificates are for the same loads of soybeans as the Turkish certificates. (Exhibit 10)
- On February 21, 2017, the State Services of Ukraine on Food Safety and Consumer Protection confirmed it issued the four Ukraine phytosanitary certificates and that the certificates are valid. (Exhibit 11)

## **Beyaz Agro – Application for Organic Transaction Certificate**

November 12, 2016, Beyaz Agro presented incomplete and false information to its organic certifying agent to obtain an organic transaction certificate for the load of fumigated Ukrainian soybeans to be shipped on M/V "Four Diamond." The organic transaction certificate provides documentation of the organic status of products for shipment to and sale in the United States. Nuray Beyaz, Import Export Assistant Specialist at Beyaz Agro, emailed an application for the certificate to USDA-accredited certifying agent Kiwa-BCS and copied Goksal Beyaz and (b) (6), (b) (7)(C), Import/Export Specialist at Hakan Organics, on the request. The application included the following documents:

- Application Form for Transaction Certificates and two certificates of inspection (HR-

023-16 and HR-024-16) for import of products from certified organic farms that were issued by bio.Inspecta AG, a USDA-accredited certifier, which identified lot numbers HRU-001 HRU-002. The certificates also listed Russia as the country of dispatch for 26,243,840 KG of organic soybeans. (Exhibit 12, 13, 14)

- Commercial invoices, bills of lading, and marine survey certificates that identify 16,250,000 KG of “organic soybeans in bulk” with “Farmer Code (Lot number) HRU-001, HRU-002” to be shipped to the United States in three holds aboard the vessel M/V Four Diamond, which matched the two certificates of inspection (HR-023-16 and HR-024-16) showing the false Russian origin. (Exhibit 15)

On November 15, 2016, Kiwa-BCS issued Beyaz Agro three organic transaction certificates (DE-25457-25, 26, and 27) based on the application. (Exhibit 16, 17, 18)

### **NOP Site Visits**

The commercial invoices and bills of lading observed by NOP personnel during visits to Agropex on March 16, 2017, and Global Natural on April 13, 2017, were different from the ones provided by Beyaz Agro to Kiwa-BCS. The commercial invoices, bills of lading, and marine survey certificates observed at Agropex and Global Natural identified the product as “non-GMO soybeans,” not as “organic soybeans.”

#### Agropex

During the visit, Ms. Darla Turner [insert Darla’s title] showed NOP copies of documents related to the shipment of soybeans aboard the M/V Four Diamonds. On March 22, 2017, Ms. Turner emailed copies of the documents she shared with NOP during the March 16 site visit. The documents included:

- Commercial invoices, bills of lading, and four marine survey certificates that identify 16,250,000 KG of “non-GMO soybeans in bulk” with “Farmer Code (Lot number) HRU-001, HRU-002” (Exhibit 19)
- Three Turkish phytosanitary certificates that show Ukraine as the place of origin for 16,250,000 KG of soybean; however, block 11 of the certificates instructed “See Attachment.” Agropex did not provide the referenced attachment. (Exhibit 20)
- Three Kiwa-BCS issued organic transaction certificates identifying farmer codes HRU-001 and HRU-002 (DE-25457-25, 26, and 27). (Exhibit 21)

Ms. Turner also provided additional documents that included a purchase/sales contract and an example of invoices from Agropex to Global Natural. The Agropex purchase contract stated:

- “Seller: Beyaz Agro at Mazaya Business Avenue BB2 Tower, 34<sup>TH</sup> Floor” and
- “Buyer: Agropex Attn: Darla Turner”

The terms and conditions of the purchase contract included the following language – This contract is subject to all contingencies beyond Hakan Agro DMCC control... rules or laws and orders of any government. (Exhibit 22) The Agropex sales invoice represented the address for Agropex as 34<sup>th</sup> Floor, BB2 Tower, Mazaya Business Avenue, Jumeirah Lake Towers, Dubai

with the e-mail as dubai@hakanfoods.com. (Exhibit 23)

### Global Natural

During the visit, Mr. Michael Spangler showed NOP copies of documents related to the shipment of soybeans aboard the M/V Four Diamonds. On April 18, 2017, Mr. Spangler provided, by e-mail, copies of the documents he shared with NOP during the April 13 site visit. The documents included:

- Bills of lading and four marine survey certificates that identify 16,250,000 KG of “non-GMO soybeans in bulk” with “Farmer Code (Lot number) HRU-001, HRU-002 (Exhibit 24)
- Three Turkish phytosanitary certificates that show Ukraine as the place of origin for 16,250,000 KG of soybean and the attachment identified in block 11 of the certificates for additional declaration that show the three certificates were issued instead of the certificate numbered 0140061 and dated 27/10/2016. (Exhibit 25)
- Three Certificates of Origin issued by the Chamber of Commerce, Gaziantep, Turkey on 7/12/2016 and numbered 0299227, 0299228, and 0299229 for Holds 1, 3, and 5 respectively. (Exhibit 26)
- Three Kiwa-BCS issued organic transaction certificates identifying farmer codes HRU-001 and HRU-002 (DE-25457-25, 26, and 27). (Exhibit 27)

Mr. Spangler also provided a copy of his contract titled “Trade Agency Agreement” between Hakan Organics and Global Natural. The contract stated that the parties agreed to enter into business on a sales agency basis. Goksal Beyaz as the General Coordinator for Hakan Organics DMCC and J. Michael Spangler as the Manager of Global Natural, LLC signed the signature page of the agreement. (Exhibit 28)

Mr. Spangler stated that Global Natural’s contract is with Hakan Organics; that all reporting of sales for the contract goes to Beyaz Agro in Gaziantep, Turkey; and that Goksal Beyaz, Hakan’s General Coordinator, signed his contract with Hakan. Mr. Spangler also stated that Hakan Agro DMCC and Beyaz Agro are the same organization; specifically, that Goksal Beyaz works for Hakan, and Beyaz Agro is a functional part of the Hakan organization. Mr. Spangler said that Global Natural simply acted as a sales agent and is paid a commission on the sales; however, the outward appearance of the process is one of Global Natural purchasing the grain from Agropex and subsequently selling to Global Natural clients. When asked about his knowledge of phytosanitary certificates associated with grains on the Four Diamond, Mr. Spangler provided additional certificates that were sent to him by an anonymous person. The certificates were Turkish certificates that linked the Four Diamonds to four Ukrainian certificates that showed the loads had been fumigated. On April 18, 2017, Mr. Spangler provided a sworn statement that recites the facts as he stated on April 13, 2017. (Exhibit 29)

### Additional Evidence

On February 17, 2017, NOP staff Lars Crail visited the Hakan Organics exhibition booth at Biofach – World Organic Trade Fair in Nuremberg, Germany and obtained two business cards for Goksal Beyaz; one card was for Beyaz Agro with Goksal Beyaz, Chairman and the other was

for Hakan Organics with Goksal Beyaz, General Coordinator. (Exhibit 1) Additionally, the exhibitor map for Biofach 2017 shows Hakan Organics and Beyaz Agro within the same booth. (Exhibit 30)

## **V. CONCLUSION**

In applying for an organic transaction certificate, Hakan Organics acted through its agents Goksal Beyaz and Beyaz Agro to present fraudulent information to an organic certifying agent of the USDA Secretary of Agriculture.

When applying to Kiwa-BCS, Beyaz Agro omitted any documents that would indicate “Ukraine” as the true country of origin of the soybeans, such as the Certificate of Origin or the Phytosanitary Certificate. Providing such information may have alerted Kiwa-BCS to the possibility that the soybeans may have been fumigated and thereby ineligible for organic certification. Instead, Beyaz Agro presented certification documents indicating the soybeans had been sourced from Russia.

Beyaz Agro provided Agropex commercial invoices, bills of lading, and marine survey certificates that identified the soybeans as non-GMO but did not identify the soybeans as organic. They also provided the fraudulently obtained organic transaction certificates issued by Kiwa-BCS to represent the soybeans as certified organic. Soybeans from M/V “Four Diamond” were sold through Agropex as organic even though the soybeans were not produced or handled in compliance with the OFPA and its accompanying regulations.

Agropex used the fraudulently obtained organic transaction certificates to identify the soybeans as organic and to store the soybeans as organic at certified organic handler Penny Newman Grain Company, Stockton, California. Subsequently, Global Natural LLC, on behalf of Hakan Organics, Beyaz Agro, and Agropex, arranged for the sale of the non-organic soybeans to certified organic handlers in the United States.

## **VI. RECOMMENDATION**

Section 205.660 of the USDA organic regulations (7 C.F.R. § 205.660) provides that the NOP may initiate suspension or revocation proceedings against a certified operation when the Program Manager has reason to believe that a certified operation has violated or is not in compliance with the OFPA or its accompanying regulations. Hakan Organics DMCC (Hakan Organics) is a certified organic operation and therefore is in full knowledge of the requirements of the USDA organic regulations. The actions of Hakan Organics, through its agents Goksal Beyaz at Beyaz Agro and through Agropex International (Agropex), to represent fumigated, non-organic soybeans as organic for sale in the United States are knowing and willful violations of the USDA organic regulations.

On April 28, 2017, the NOP proposed to revoke the eligibility for organic certification of Beyaz Agro and Hakan Organics DMCC, and all their responsibly connected parties. Revocation would apply to Beyaz Agro and Hakan Organics, and all of their responsibly connected persons, including any other person who is a partner, officer, director, holder, manager or owner of 10 percent or more of the voting stock of Hakan Organics.

On May 30, 2017, Beyaz Agro notified the NOP of their intent to surrender their organic certificate, and their intent not to appeal the proposed revocation. Therefore, the NOP revoked Beyaz Agro's organic certification on June 2, 2017. However, on May 30, 2017, Hakan Organics submitted an appeal of its proposed revocation.

---End---



# Beyaz Agro

IMP. EXP. INDUSTRY INC.

**Goksal BEYAZ**  
Chairman

Budak Mah. 10031 Nolu Sok. No: 42  
Yasem İş Merk. Kat: 10 D: 1016-1017  
Şehitkamil - GAZİANTEP / TÜRKİYE  
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(b) (6)

[www.beyazagro.com](http://www.beyazagro.com)  
[goksal.beyaz@beyazagro.com](mailto:goksal.beyaz@beyazagro.com)



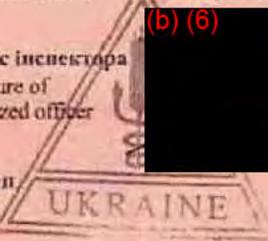
**Göksal BEYAZ**  
General Coordinator

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(b) (6)

[goksal.beyaz@hakanfoods.com](mailto:goksal.beyaz@hakanfoods.com)

[www.hakanfoods.com](http://www.hakanfoods.com)

<b>1. Експортер та його адреса</b> Name and address of the exporter  "CLOV" LTD, APT. 505, 18/7 KUTUZOV STR., KYIV, UKRAINE	<b>2. ФІТОСАНІТАРНИЙ СЕРТИФІКАТ</b> PHYTOSANITARY CERTIFICATE № <u>75/ 15- 036/ ВХ - 500973</u>
<b>3. Імпорттер та його адреса</b> Name and address of the importer  HAKAN AGRO DMCC C. AMISERIF MAH. 5217 SOK. COGAL APT 3/8 MERSIN / TURKEY	<b>4. В організації карантину і захисту рослин</b> <b>TURKEY</b> (країна-імпортер) To Quarantine and Plant Protection Organization <u>TURKEY</u> (country of import)  <b>5. Місце походження</b> Place of origin <b>UKRAINE</b>
<b>6. Пункт увезення</b> Declared point of entry <b>MERSIN PORT - TURKEY</b>  <b>7. Спосіб транспортування</b> Declared means of conveyance <b>TRUCK</b>	 <b>УКРАЇНА</b> <b>UKRAINE</b> <b>Державна ветеринарна та фітосанітарна служба України</b> <b>State Veterinary and Phytosanitary Service of Ukraine</b>
<b>8. Маркування, назва підкарантинного матеріалу, ботанічна назва рослини</b> Marks, number and description of packages, name of produce, botanical name of plants <b>SOYBEANS IN BULK (GLYCINE MAX) CODE 1201</b>	<b>9. Кількість</b> Quantity  <b>(b) (4)</b>
<b>10. Цей сертифікат засвідчує, що зазначені вище рослини, рослинні продукти чи інші регульовані матеріали були перевірені та/або пройшли експертизу у відповідності до необхідних офіційних процедур і вважаються вільними від шкідливих організмів, що є карантинними для країни-імпортера, та відповідають специфічним фітосанітарним вимогам країни-імпортера, включаючи і регульовані некарантинні шкідливі організми.</b> This is to certify that the plants, plant products or other regulated articles described above have been inspected and/or tested according to appropriate official procedures and are considered to be free from the quarantine pests specified by the importing contracting party and to conform with the current phytosanitary requirements of the importing contracting party including those for regulated non-quarantine pests.	
<b>11. Додаткова декларація</b> Additional declaration  <b>NO</b>	<b>18. Місце</b> Place of issue  <b>(b) (6)</b>
<b>ЗНЕЗАРАЖЕННЯ</b> Disinfestation and/or disinfection treatment	<b>18. Місце</b> Place of issue  <b>(b) (6)</b>
<b>12. Обробка</b> Treatment <b>Fumigation</b>	<b>14. Експозиція та температура</b> Duration and temperature <b>5 days / 120 hours</b>
<b>13. Хімічна (діюча речовина)</b> Chemical (active ingredient) <b>Alluminium phosphide (ALP)</b>	<b>14. Експозиція та температура</b> Duration and temperature <b>5 days / 120 hours</b>
<b>15. Концентрація</b> Concentration <b>3,6 gr/m³</b>	<b>16. Дата</b> Date <b>31 March 2016</b>
<b>17. Додаткова інформація</b> Additional information <b>Fumigation while dispatching. Fumigation certificate № 001/O d.d. 31.03.2016</b>	<b>Прізвище держінспектора</b> Name of authorized officer <b>Tsiganok E.V.</b>  <b>Підпис інспектора</b> Signature of authorized officer <b>(b) (6)</b>  <b>Штамп</b> Stamp 

19

1. Експортер та його адреса  
Name and address of the exporter

JPC "BILOVODSKY KHP"  
2 BILOVODS'KA STREET, VILLAGE BILOVOD,  
ROMENSKYI AREA, SUMY REGION, 42065

2. ФІТОСАНІТАРНИЙ  
СЕРТИФІКАТ

PHYTOSANITARY CERTIFICATE

№ 75/ 14- 040/ BX - 083763

3. Імпорттер та його адреса  
Name and address of the importer

HAKAN AGRO DMCC  
CAMISERIF MAH. 5217 SOK. COGAL APT 3/8  
MERSIN / TURKEY

4. В організації карантину і захисту рослин  
TURKEY (країна-імпортер)

To Quarantine and Plant Protection  
Organization TURKEY (country of import)

5. Місце походження  
Place of origin UKRAINE

6. Пункт увезення  
Declared point of entry  
TURKEY

UKRAINE  
UKRAINE

Державна ветеринарна та фітосанітарна  
служба України  
State Veterinary and Phytosanitary Service  
of Ukraine

7. Спосіб транспортування  
Declared means of conveyance  
MV "UZEYIR HAJIBEYLI"

8. Маркування, назва підкарантинного матеріалу, ботанічна назва рослин  
Marks, number and description of packages, name of produce, botanical name of plants  
SOYABEANS IN BULK -GLYCINE MAX (1201)

9. Кількість  
Quantity  
(b) (4)

10. Цей сертифікат засвідчує, що зазначені вище рослини, рослинні продукти та інші регульовані матеріали були перевірені та/або пройшли експертизу у відповідності до необхідних офіційних процедур карантину рослин країни-імпортера, які включають організми, що є карантинними для країни-імпортера, та відповідають другим фітосанітарним вимогам країни-імпортера, включаючи і регульовані некарантинні пошкодливці організми.

This is to certify that the plants, plant products or other regulated articles described above have been inspected and/or tested according to appropriate official procedures and are considered to be free from the quarantine pests specified by the importing party and to conform with the current phytosanitary requirements of the importing party including those for regulated non-quarantine pests.

11. Додаткова декларація  
Additional declaration

Тарих (b) (6) Sayı: 62/5715

12. Обробка  
Treatment FUMIGATION

Місце виходу  
Place of issue UKRAINE, NIKOLAEV

13. Хімічна (діюча речовина)  
Chemical (active ingredient) ALUMINIUM PHOSPHIDE

14. Експозиція та температура  
Duration and temperature 72 hours, t + 16 C

Дата  
Date 08 May 2016

Прізвище держінспектора  
Name of authorized officer PARSENYUK (b) (6)

15. Концентрація  
Concentration 3,0 GR/M3

16. Дата  
Date 08 May 2016

Підпис інспектора  
Signature of authorized officer (b) (6)

17. Додаткова інформація  
Additional information FUMIGATION IN TRANSIT

Штамп  
Stamp UKRAINE

<p>1. Експортер та його адреса Name and address of the exporter</p> <p>"RAW AGRO" LLC 103, ARTEMA STR. KIEV, UKRAINE</p>	<p>2. ФІТОСАНІТАРНИЙ СЕРТИФІКАТ PHYTOSANITARY CERTIFICATE</p> <p>№ <u>75/ 15- 010/ ВХ - 468423</u></p>	
<p>3. Імпортёр та його адреса Name and address of the importer</p> <p>HAKAN AGRO DMCC CAMISERIF MAH. 5217 SOK. COGAL APT 3/8 MERSIN / TURKEY</p>	<p>4. В організацію карантину і захисту рослин TURKEY (країна-імпортер) To Quarantine and Plant Protection Organization <u>TURKEY</u> (country of import)</p>	
<p>6. Пункт увезення Declared point of entry</p> <p>MERSIN OR MARMARA PORT - TURKEY</p>	<p>5. Місце походження Place of origin <u>UKRAINE</u></p> <p>УКРАЇНА UKRAINE Державна ветеринарна та фітосанітарна служба України State Veterinary and Phytosanitary Service of Ukraine</p>	
<p>7. Спосіб транспортування Declared means of conveyance</p> <p>M/V "МОНАС"</p>	<p>6. Пункт увезення Declared point of entry</p> <p>MERSIN OR MARMARA PORT - TURKEY</p>	
<p>8. Маркування, назва підкарантинного матеріалу, ботанічна назва рослини Marks, number and description of packages, name of produce, botanical name of plants</p> <p>SOYBEANS IN BULK (GLYCINE MAX) CODE 1201</p>		<p>9. Кількість Quantity</p> <p>(b) (4)</p>
<p>10. Цей сертифікат засвідчує, що зазначені вище рослини, рослинні продукти чи інші регульовані матеріали були перевірені та/або пройшли експертизу у відповідності до необхідних офіційних процедур і вважаються вільними від шкідливих організмів, що є карантинними для країни-імпортера, та відповідають діючим фітосанітарним вимогам країни-імпортера, включаючи і регульовані некарантинні шкідливі організми.</p> <p>This is to certify that the plants, plant products or other regulated articles described above have been inspected and/or tested according to appropriate official procedures and are considered to be free from the quarantine pests specified by the importing contracting party and to conform with the current phytosanitary requirements of the importing contracting party including those for regulated non-quarantine pests.</p> <p>Mersin Ziraat Karantina Müdürlüğü</p>		
<p>11. Додаткова декларація Additional declaration <u>NO</u></p> <p>Tarih <u>10.05.2016</u> Savi: <u>02.5537</u></p>		
<p>ЗНЕЗАРАЖЕННЯ Disinfestation and/or disinfection treatment</p>		<p>18. Місце оформлення Place of issue</p> <p>Ukraine, Odessa-port</p>
<p>12. Обробка Treatment</p> <p>FUMIGATION</p>	<p>(b) (6), (b) (7)(C)</p>	
<p>13. Хімічна (діюча речовина) ALUMINIUM Chemical PHOSPHIDE (active ingredient) TABLETS</p>	<p>14. Експозиція та температура Duration and temperature</p> <p>96 HOURS t+ 16 C</p>	<p>Прізвище держінспектора Name of authorized officer</p> <p>04 May 2016</p> <p>(b) (6)</p>
<p>15. Концентрація Concentration</p> <p>3.6 gr./m<sup>3</sup></p>	<p>16. Дата Date</p> <p>04 May 2016</p>	<p>Підпис інспектора Signature of authorized officer</p> <p>(b) (6)</p>
<p>17. Додаткова інформація Additional information</p> <p>Fumigation while dispatching. Fumigation certificate № 36/16 Odd 04.05.2016</p>		<p>Штамп Stamp</p> <p>UKRAINE</p>

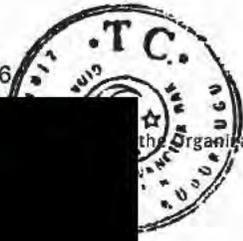
<p>1. Експортер та його адреса Name and address of exporter</p> <p>LLC "ADM TRADING UKRAINE", APT. 16-A, PETRA SAHAYDACHNOGO, 04070, KYIV, UKRAINE</p>	<p>2. ФІТОСАНІТАРНИЙ СЕРТИФІКАТ PHYTOSANITARY CERTIFICATE</p> <p>№ <u>60/15-6.054/XX-181135</u></p>	
<p>3. Імпорттер та його адреса Declared name and address of consignee</p> <p>HAKAN AGRO DMCC CAMISERIF MAH. 5217 SOK. COGAL APT 3/8 MERSIN / TURKEY</p>	<p>4. До організації карантину і захисту рослин <u>TURKEY</u> (країна-імпортер) Plant Protection Organization(s) of <u>TURKEY</u> (country of import)</p>	<p>5. Місце походження Place of origin <u>UKRAINE</u></p>
<p>6. Пункт ввезення Declared point of entry</p> <p>MERSIN OR MARMARA PORT - TURKEY</p>	<p>УКРАЇНА UKRAINE</p> <p>Державна служба України з питань безпеки харчових продуктів та захисту споживачів</p> <p>State Service of Ukraine on Food Safety and Consumer Protection</p>	
<p>7. Спосіб транспортування Declared means of conveyance</p> <p>M/V "CECELA S"</p>		
<p>8. Маркування, кількість та опис пакування, найменування об'єктів регулювання, ботанічна назва рослини Distinguishing marks, number and description of packages, name of produce, botanical name of plants</p> <p>SOYABEANS IN BULK (GLYCINE MAX) CODE 1201</p>	<p>9. Кількість. Declared quantity</p> <p>(b) (4)</p>	
<p>10. Цей сертифікат засвідчує, що зазначені рослини, рослини-продукти чи інші об'єкти регулювання були перевірені та/або пройшли експертизу із застосуванням необхідних офіційних процедур, вважаються вільними від шкідливих організмів, що є карантинними для країни-імпортера, та відповідають діючим фітосанітарним вимогам країни-імпортера, включаючи регульовані некарантинні шкідливі організми.</p> <p>This is to certify that the plants, plant products or other regulated articles described herein have been inspected and/or tested according to appropriate official procedures and are considered to be free from the quarantine pests specified by the importing party and to conform with the current phytosanitary requirements of the importing contracting party including those for regulated non-quarantine pests.</p> <p>Mersin Ziraat Karantina Müdürlüğü BİTKİ SAĞLIĞI KONTROLÜ</p> <p>MERSİN Giriş Kapısında Yapılmıştır Tarih : 14.10.2016 Sayı : 60/1795</p>		
<p>11. Додаткова декларація Additional declaration</p> <p>NO</p>		
<p>ЗНЕЗАРАЖЕННЯ Disinfestation and/or disinfection treatment</p>	<p>18. Місце оформлення Place of issue Ukraine</p>	
<p>12. Обробка Treatment</p> <p>FUMIGATION</p>	<p>14. Експозиція та температура Duration and temperature</p> <p>72 HOURS t +17 °C</p>	<p>Дата Date 08 October</p>
<p>13. Хімічна (діюча речовина) Chemical (active ingredient)</p> <p>ALUMINIUM PHOSPHIDE TABLETS</p>		<p>Прізвище державного фітосанітарного інспектора Name of state phytosanitary inspector</p>
<p>15. Концентрація/доза Concentration/dose</p> <p>3.6 gr./m3</p>	<p>16. Дата Date</p> <p>08 October 2016</p>	<p>Підпис державного фітосанітарного інспектора Signature of state phytosanitary inspector</p> <p>Sledenko S.V.</p>
<p>17. Додаткова інформація Additional information</p> <p>Fumigation while dispatching. Fumigation Certificate. № 72/16.O.dd. 08.10.2016</p>	<p>МП Stamp</p> <p>15 054 UKRAINE</p> <p>(b) (6), (b) (7) (C)</p>	

MINISTRY OF FOOD, AGRICULTURE AND LIVESTOCK

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<b>1 - Name and address of exporter</b> BEYAZAGRO ITH.IHR.SAN VE TIC.AS.  BUDAK MAH.10031 NOLU SOK.NO:42 YASEM IS MERK KAT:10 D:1016-1017 SEHITKAMIL-GAZIANTEP		<b>2 - PHYTOSANITARY CERTIFICATE</b> FOR RE - EXPORT NO : EC/TR B 0140061	
<b>3 - Declared name and address of consignee</b>  AGROPEX INTERNATIONAL INC  413 SOUTH MAIN STREET BROADWAY , VIRGINIA 22815 USA		<b>4 - Plant Protection Organization of Türkiye to Plant Protection Organization(s) of</b>  UNITED STATES OF AMERICA	
		<b>5 - Place of origin</b>  UKRAINE	
<b>6 - Declared means of conveyance</b>  BY VESSEL		Reg. No REX-13205	
<b>7 - Declared point of entry</b>  U.S.A.		Prod. Code 1201.90.00	
<b>8 - Distinguishing marks: number and description of packages; name of the product; botanical name of plants</b>  0 IN BULK      SOYBEAN <i>Glycine max (L.)</i>		<b>9 - Quantity declared</b>  Net Kgs      Gross Kgs (b) (4)	
<b>10 - This is to certify that</b> - the plants, plant products or other regulated articles described above were imported into the Republic of Turkey (country of re-export) from <u>UKRAINE</u> (country of origin) covered by Phytosanitary Certificate No <u>500973-083763-468423-181135</u> original <input type="checkbox"/> certified true copy <input type="checkbox"/> of which is attached to this certificate; • they are packed <input type="checkbox"/> repacked <input type="checkbox"/> in original <input type="checkbox"/> new <input type="checkbox"/> containers. • based on the original Phytosanitary Certificate <input type="checkbox"/> and additional inspection <input type="checkbox"/> , they are considered to conform with the current phytosanitary requirements of the importing country, and - during storage in the Republic of Turkey (country of re-export), the consignment has not been subjected to the risk of infestation or infection. (*) insert tick in appropriate boxes			
<b>11 - Additional declaration</b>  XXXXXXXXXXXNONXXXXXXXXXXXX			
<b>DESINFESTATION AND/OR DISINFECTION TREATMENT</b>		<b>18 - Place of issue</b>	
<b>12 - Treatment</b> XXXXXXXNONXXXXXXXXXX		Date      MERSIN 27 October 2016	
<b>13 - Chemical (Active Ingredient)</b> XXXXXXXNONEXXX	<b>14 - Duration and Temperature</b> XXXXXXXNONEXXX	Name and signature (b) (6), (b) (7)(C)	
<b>15 - Concentration</b> XXXXXXXNONEXXX	<b>16 - Date</b> XXXXXXXNONEXXX		
<b>17 - Additional Information</b> XXXXXXXNONXXXXXXXXXX		Stamp of the Organization 	

# MINISTRY OF FOOD, AGRICULTURE AND LIVESTOCK

- Name and address of exporter İEYAZAGRO İTH.İHR.SAN VE TIC.AS.  İUDAK MAH.10031 NOLU SOK.NO:42 İASEM İS MERK KAT:10 D:1016-1017 İEHİTKAMİL-GAZİANTEP	<b>2 - PHYTOSANITARY CERTIFICATE</b>  <b>FOR RE - EXPORT</b> <b>NO : EC/TR B 0140369</b>  ORIGINAL							
- Declared name and address of consignee  GROPEX INTERNATIONAL INC.  13 SOUTH MAIN STREET BROADWAY, VA 22815 USA PHONE:+1 40-246-3231	<b>4 - Plant Protection Organization of Türkiye to Plant Protection Organization(s) of</b>  <b>UNITED STATES OF AMERICA</b>							
	<b>5 - Place of origin</b>  <b>UKRAINE</b>							
- Declared means of conveyance İY VESSEL	TÜRKİYE CUMHURİYETİ   T.C. GIDA TARIM VE HAYVANCILIK BAKANLIĞI	Reg. No REX-13589  Prod. Code 12019000						
- Declared point of entry TOCKTON								
- Distinguishing marks: number and description of packages: name of the product : botanical name of plants  <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;">                     HRU-001;HRU-00 2                 </div> <div style="width: 30%; text-align: center;">                     0 IN BULK                 </div> <div style="width: 30%;">                     SOYBEAN  <i>Glycine max (L.)</i> </div> </div>		<b>9 - Quantity declared</b>  <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; text-align: right;">Net Kgs</td> <td style="width: 30%;"></td> <td style="width: 30%; text-align: right;">Gross Kgs</td> </tr> <tr> <td style="text-align: right;">(b) (4)</td> <td style="background-color: black;"></td> <td style="text-align: right;"></td> </tr> </table>	Net Kgs		Gross Kgs	(b) (4)		
Net Kgs		Gross Kgs						
(b) (4)								
1 - This is to certify that  - the plants, plant products or other regulated articles described above were imported into the Republic of Turkey (country of re-export) from.....(country of origin) covered by Phytosanitary Certificate No. .... original <input type="checkbox"/> * certified true copy <input type="checkbox"/> * of which is attached to this certificate; • they are packed <input type="checkbox"/> * repacked <input type="checkbox"/> * in original <input type="checkbox"/> * new <input type="checkbox"/> * containers, • based on the original Phytosanitary Certificate <input type="checkbox"/> * and additional inspection <input type="checkbox"/> *, they are considered to conform with the current phytosanitary requirements of the importing country, and - during storage in the Republic of Turkey (country of re-export), the consignment has not been subjected to the risk of infestation or infection. (*) Insert tick in appropriate boxes								
- Additional declaration  SEE ATTACHMENT								
<b>DESINFESTATION AND/OR DISINFECTION TREATMENT</b>  1 - Treatment XXXXXNONEXXXXXXX  1 - Chemical (Active Ingredient)      14 - Duration and Temperature XXXXXNONEXXX                              XXXXXNONEXXXXX  1 - Concentration                              16 - Date XXXXXNONEXXX                              XXXXXNONEXXXXX  - Additional Information XXXXXNONEXXXXXXX		<b>18 - Place of issue</b>  Date      MERSİN 4 November 2016  (b) (6), (b) (7)(C) Name of the ..... Organization 						

Uyarı: Bitki Sağlık Sertifikasını sahte olarak düzenleyen, başkalarını aktaracak şekilde değiştiren veya kullanan kişiler 5237 sayılı Türk Ceza Kanunu 204. Maddesine göre iki yıldan beş yıla kadar hapis cezası ile cezalandırılır.  
 Notice: The person who arrange fraudulent Phytosanitary Certificate or Change or use the Phytosanitary Certificate in such a way to deceive other people shall be punished with penalty of imprisonment from two to five years accordance with Article 204 of Turkish Penal Code numbered 5237.

REPUBLIC OF TURKEY

MINISTRY OF FOOD,  
AGRICULTURE AND LIVESTOCK

ATTACHMENT SHEET FOR  
PHYTOSANITARY CERTIFICATE OR  
PHYTOSANITARY CERTIFICATE  
FOR RE-EXPORT

TÜRKİYE CUMHURİYETİ



PHYTOSANITARY CERTIFICATE OR  
RE-EXPORT PHYTOSANITARY CERTIFICATE

NO EC/TRA 0140369

DATE 04.11.2016 00:00:00

TO: THE PLANT PROTECTION ORGANIZATION(S) OF

UNITED STATES OF AMERICA

ADDITIONAL OFFICIAL PHYTOSANITARY INFORMATION

- Ek Deklarasyon (Additional Declaration) (Box 11)

- COMM. INV: 24061\_01, - FARMER CODE (LOT NO): HRU-001; HRU-002, - HOLD#1, -CUSTOMER  
LOT NO:LT0050128, - SHIPMENT WAS INSPECTED AND FOUND TO  
BE FREE OF KHAPRA BEETLE (TROGODERMA GRANARIUM)

This phytosanitary certificate is issued instead of the certificate numbered 0140061 and dated 27/10/2016.

PLACE OF ISSUE

MERSİN

DATE ISSUED

04.11.2016 00:00:00

NAME AND

(b) (6), (b) (7)(C)

STAMP OF ORGANIZATION





REPUBLIC OF TURKEY

MINISTRY OF FOOD,  
AGRICULTURE AND LIVESTOCK

ATTACHMENT SHEET FOR  
PHYTOSANITARY CERTIFICATE OR  
PHYTOSANITARY CERTIFICATE  
FOR RE-EXPORT

TÜRKİYE CUMHURİYETİ



- T.C.  
GIDA TARIM VE HAYVANCILIK  
BAKANLIĞI

PHYTOSANITARY CERTIFICATE OR  
RE-EXPORT PHYTOSANITARY CERTIFICATE

NO

EC/TR A 0140368

DATE

04.11.2016 00:00:00

TO: THE PLANT PROTECTION ORGANIZATION(S) OF

UNITED STATES OF AMERICA

ADDITIONAL OFFICIAL PHYTOSANITARY INFORMATION

- Ek Deklarasyon (Additional Declaration) (Box 11)

- COMM. INV: 24061\_02, - FARMER CODE (LOT NO): HRU-001; HRU-002, - HOLD#3, -CUSTOMER LOT  
NO:LT0050129, - SHIPMENT WAS INSPECTED AND

FOUND TO BE FREE OF KHAPRA BEETLE (TROGODERMA GRANARIUM)

This phytosanitary certificate is issued instead of the certificate numbered 0140061 and dated 27/10/2016.

PLACE OF ISSUE

MERSİN

DATE ISSUED

04.11.2016 00:00:00

NAME AND ADDRESS OF THE ISSUING OFFICE

(b) (6), (b) (7)(C)

STAMP OF ORGANIZATION



# MINISTRY OF FOOD, AGRICULTURE AND LIVESTOCK

- Name and address of exporter BEYAZAGRO ITH.IHR.SAN VE TIC.AS.  BUDAK MAH.10031 NOLU SOK.NO:42 YASEM IS MERK KAT:10 D:1016-1017 SEHITKAMIL-GAZIANTEP	<b>2 - PHYTOSANITARY CERTIFICATE</b>  <b>FOR RE - EXPORT</b> <b>NO : EC/TR B 0140367</b>  ORIGINAL
- Declared name and address of consignee  AGROPEX INTERNATIONAL INC.  413 SOUTH MAIN STREET BROADWAY, VA 22815 USA PHONE:+1 540-246-3231	4 - Plant Protection Organization of Türkiye to Plant Protection Organization(s) of  <b>UNITED STATES OF AMERICA</b>  5 - Place of origin  <b>UKRAINE</b>
- Declared means of conveyance BY VESSEL	<div style="display: flex; align-items: center;"> <div style="text-align: center;">  <p>T.C. GIDA TARIM VE KAYMANLIK BAKANLIĞI</p> </div> <div style="margin-left: 20px;">                 Reg. No REX-13587             </div> </div>
- Declared point of entry  STOCKTON	Prod. Code 12019000
- Distinguishing marks: number and description of packages: name of the product: botanical name of plants  <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;">                     HRU-001;HRU-00 2                 </div> <div style="width: 30%; text-align: center;">                     0 IN BULK                 </div> <div style="width: 30%;">                     SOYBEAN  <i>Glycine max (L.)</i> </div> </div>	9 - Quantity declared  Net Weight (b) (4)
1 - This is to certify that  - the plants, plant products or other regulated articles described above were imported into the République of Turkey (country of re-export) from.....(country of origin) covered by Phytosanitary Certificate No. .... original <input type="checkbox"/> certified true copy <input type="checkbox"/> of which is attached to this certificate; • they are packed <input type="checkbox"/> repacked <input type="checkbox"/> in original <input type="checkbox"/> new <input type="checkbox"/> containers, • based on the original Phytosanitary Certificate <input type="checkbox"/> and additional inspection <input type="checkbox"/> , they are considered to conform with the current phytosanitary requirements of the importing country, and - during storage in the Republic of Turkey (country of re-export), the consignment has not been subjected to the risk of infestation or infection. (*) Insert tick in appropriate boxes	
- Additional declaration  SEE ATTACHMENT	
<b>DESINFESTATION AND/OR DISINFECTION TREATMENT</b>  - Treatment XXXXXXNONEXXXXXXX  - Chemical (Active Ingredient)      14 - Duration and Temperature XXXXXXNONEXXX                              XXXXXXNONEXXXX  - Concentration                              16 - Date XXXXXXNONEXXX                              XXXXXXNONEXXXX  - Additional information XXXXXXNONEXXXXXXX	18 - Place of issue  Date                              MERSIN 4 November 2016  Name and address of the authority                              (b) (6), (b) (7)(C)

Uyarı: BİTKİ SAĞLIK SERTİFİKASINI SAHİ OLARAK DÜZENLEYEN, BAŞKALARINI ALDATICAK ŞEKİLDE DEĞİŞTİREN VEYA KULLANAN KİŞİLER 5237 SAYILI TÜRK CEZA KANUNU 204. MADDESİNE GÖRE İKİ YILDAN BEŞ YILA KADAR HAPİS CEZASI İLE CEZALANDIRILIR.  
 Notice: The person who arrange fraudulent Phytosanitary Certificate or Change or use the Phytosanitary Certificate in such a way to deceive other people shall be punished with penalty of imprisonment from two to five years accordance with Article 204 of Turkish Penal Code numbered 5237.

REPUBLIC OF TURKEY

TÜRKİYE CUMHURİYETİ

PHYTOSANITARY CERTIFICATE OR  
RE-EXPORT PHYTOSANITARY CERTIFICATE

MINISTRY OF FOOD,  
AGRICULTURE AND LIVESTOCK



ATTACHMENT SHEET FOR  
PHYTOSANITARY CERTIFICATE OR  
PHYTOSANITARY CERTIFICATE  
FOR RE-EXPORT

NO EC/TRA 0140367

DATE 04.11.2016 00:00:00

TO: THE PLANT PROTECTION ORGANIZATION(S) OF

UNITED STATES OF AMERICA

ADDITIONAL OFFICIAL PHYTOSANITARY INFORMATION

- Ek Deklarasyon (Additional Declaration) (Box 11)

- COMM. INV: 24061\_03, -FARMER CODE (LOT NO): HRU-001; HRU-002 , - HOLD#5, -CUSTOMER LOT  
NO:LT0050130, - SHIPMENT WAS INSPECTED AND FOUND  
TO BE FREE OF KHAPRA BEETLE (TROGODERMA GRANARIUM)

This phytosanitary certificate is issued instead of the certificate numbered 0140061 and dated 27/10/2016.

PLACE OF ISSUE

MERSİN

DATE ISSUED

04.11.2016 00:00:00

NAME AND ADDRESS OF ISSUING OFFICE

(b) (6), (b) (7)(C)

STAMP OF ORGANIZATION



## Regalado, Andrew - AMS

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**From:** Sawatzki, Kimberly S <SawatzkiKS@state.gov>  
**Sent:** Monday, April 10, 2017 7:16 AM  
**To:** Bradley, Mark - AMS; Elizabeth.Leonardi-FASContact; Dwight Wilder  
**Cc:** Holmes, Vella - AMS; Regalado, Andrew - AMS; McEvoy, Miles - AMS; Rakola, Betsy - AMS (OCIO); Strzelecki, Kelly - FAS  
**Subject:** RE: Request for information on Turkish Import/Export requirements

Hi Mark,

Below is an email exchange (about the certificates you asked us to verify) between Nergiz Ozbag, our Senior Ag Specialist, and Muharrem Selcuk, Director General, General Directorate of Food and Control in the Ministry of Food, Agriculture and Livestock. Nergiz' translation is below.

We are still following up on the other questions.

Regards,

Kim

Kimberly Sawatzki  
Agricultural Counselor  
US Embassy Ankara  
Tel +90 312 457 7383  
Cell (b) (6)

**From:** Ozbag, Nergiz  
**Sent:** Monday, April 10, 2017 2:01 PM  
**To:** Sawatzki, Kimberly S  
**Cc:** Leonardi, Elizabeth V  
**Subject:** Fw: Re-export phytosanitary certificate

Hi Kim,  
Muharrem Selcuk sent the below e-mail today. he says that (b) (5)  
(b) (5)

Nergiz

Sent from my BlackBerry 10 smartphone.  
**From:** Muharrem SELÇUK <muharrem.selcuk@tarim.gov.tr>  
**Sent:** Monday, April 10, 2017 11:58  
**To:** Ozbag, Nergiz

Subject: RE: Re-export Bitki sagligi sertifikasi

Nergiz Hanım iyi günler,

(b) (5)

Saygılarımla  
Muharrem Selçuk

From: Ozbag, Nergiz [mailto:OzbagN@state.gov]  
Sent: Monday, April 03, 2017 12:26 PM  
To: Muharrem SELÇUK  
Subject: Re-export Bitki sagligi sertifikasi

Sayın Genel Mudurum,

(b) (5)

Saygılarımla,

Nergiz OZBAG  
Official  
UNCLASSIFIED

-----Original Message-----

From: Bradley, Mark - AMS [mailto:Mark.Bradley@ams.usda.gov]  
Sent: Thursday, April 06, 2017 7:20 PM  
To: Sawatzki, Kimberly S; Leonardi, Elizabeth V; Wilder, Dwight A  
Cc: Holmes, Vella - AMS; Regalado, Andrew - AMS; McEvoy, Miles - AMS; Rakola, Betsy - AMS (OCIO); Strzelecki, Kelly - FAS  
Subject: RE: Request for information on Turkish Import/Export requirements

Hi Kim,

Thank you very much for this information.

(b) (5)

Regards,  
Mark

-----Original Message-----

From: Sawatzki, Kimberly S [mailto:SawatzkiKS@state.gov]

Sent: Thursday, April 06, 2017 11:47 AM

To: Bradley, Mark - AMS <Mark.Bradley@ams.usda.gov>; Elizabeth.Leonardi-FASContact <leonardiev@state.gov>; Dwight Wilder <WilderDA@State.gov>

Cc: Holmes, Vella - AMS <Vella.Holmes@ams.usda.gov>; Regalado, Andrew - AMS <Andrew.Regalado@ams.usda.gov>;

McEvoy, Miles - AMS <Miles.McEvoy@ams.usda.gov>; Rakola, Betsy - AMS (OCIO) <Betsy.Rakola@ams.usda.gov>;

Strzelecki, Kelly - FAS <Kelly.Strzelecki@fas.usda.gov>

Subject: Re: Request for information on Turkish Import/Export requirements

Hi Mark,

We will look into this all and get back to you, although it might not be until early next week since our contact is out.

However, here is some interesting news. (b) (5)

(b) (5)

We will be in touch!

Kim

Kimberly Sawatzki  
Agricultural Counselor  
U.S. Embassy Ankara  
Tel. +90312 457 7383  
Cell (b) (6)

Email Kim.Sawatzki@fas.usda.gov

From: Bradley, Mark - AMS

Sent: Thursday, April 6, 2017 4:22 PM

To: Sawatzki, Kimberly S; Leonardi, Elizabeth V; Wilder, Dwight A

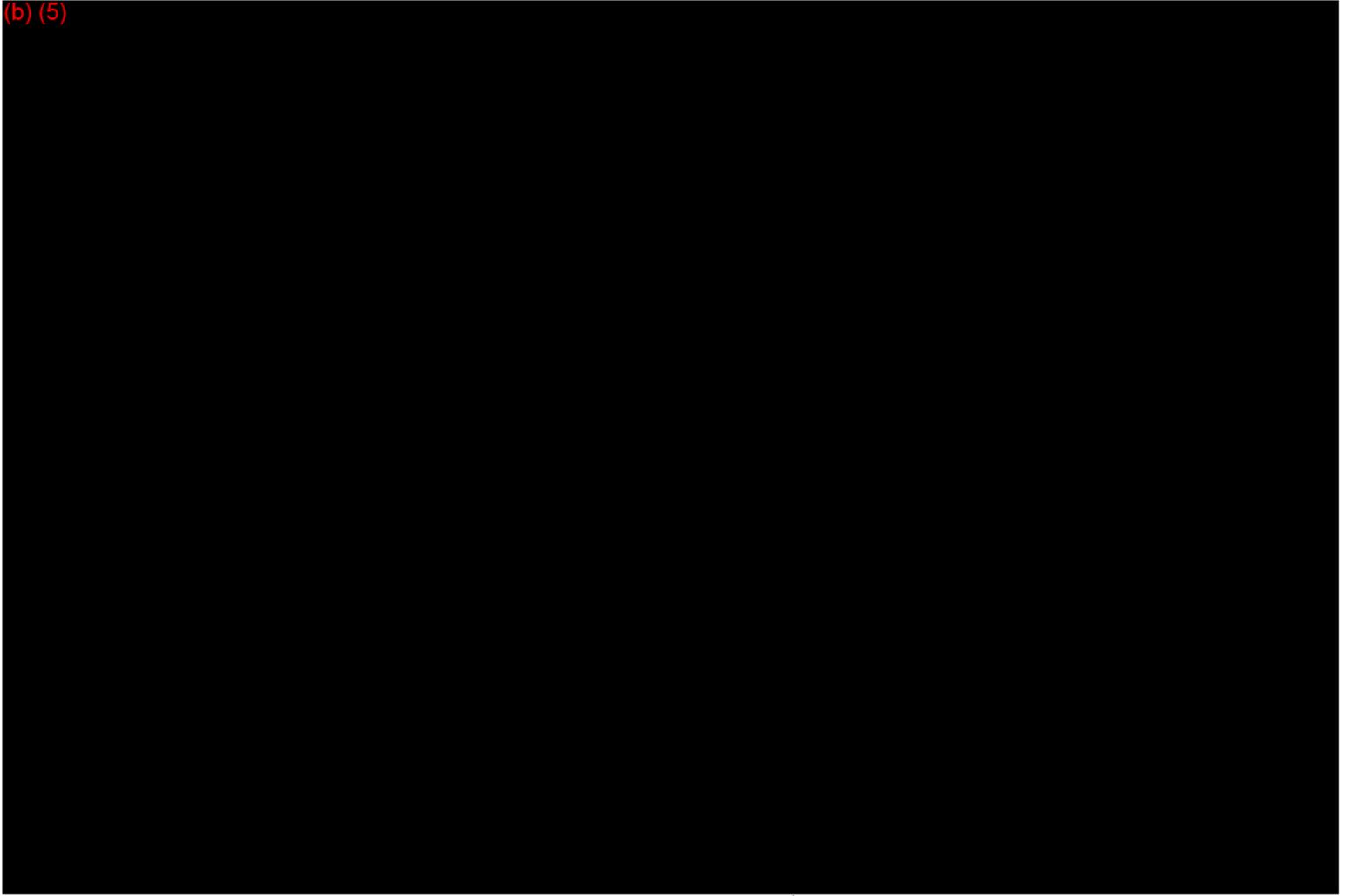
Cc: Holmes, Vella - AMS; Regalado, Andrew - AMS; McEvoy, Miles - AMS; Rakola, Betsy - AMS (OCIO); Strzelecki, Kelly - FAS

Subject: Request for information on Turkish Import/Export requirements

Hi Kim, Elizabeth and Dwight -

(b) (5)

(b) (5)



Thank you very much.

Regards,

Mark

-----Original Message-----

From: Sawatzki, Kimberly S [mailto:SawatzkiKS@state.gov]

Sent: Thursday, March 30, 2017 1:10 PM

To: Bradley, Mark - AMS <Mark.Bradley@ams.usda.gov>; Elizabeth.Leonardi-FASContact <leonardiev@state.gov>;  
Dwight Wilder <WilderDA@State.gov>

Cc: Holmes, Vella - AMS <Vella.Holmes@ams.usda.gov>; Regalado, Andrew - AMS <Andrew.Regalado@ams.usda.gov>;  
McEvoy, Miles - AMS <Miles.McEvoy@ams.usda.gov>; Rakola, Betsy - AMS (OCIO) <Betsy.Rakola@ams.usda.gov>

Subject: Re: Turkish Ministry of Ag warning on fake organic certificates

Hi Mark,

I have added Dwight Wilder, our Ag Attaché in Kyiv, to this email. (b) (5)  
(b) (5) I will chat with Dwight about this and if he needs more information, he can reach back to you.

Lars has met Dwight before, and Dwight and I have chatted a bit about the issue, so he is aware of it.

Regards,

Kim

Kimberly Sawatzki

Agricultural Counselor

U.S. Embassy Ankara

Tel. +90312 457 7383

Cell (b) (6)

Email [Kim.Sawatzki@fas.usda.gov](mailto:Kim.Sawatzki@fas.usda.gov)<mailto:Kim.Sawatzki@fas.usda.gov>

From: Bradley, Mark - AMS

Sent: Thursday, March 30, 2017 7:00 PM

To: Sawatzki, Kimberly S; Leonardi, Elizabeth V

Cc: Holmes, Vella - AMS; Regalado, Andrew - AMS; McEvoy, Miles - AMS; Rakola, Betsy - AMS (OCIO)

Subject: RE: Turkish Ministry of Ag warning on fake organic certificates

Hi Kim and Elizabeth,



From: Sawatzki, Kimberly S [mailto:SawatzkiKS@state.gov]

Sent: Thursday, March 30, 2017 3:46 AM

To: Bradley, Mark - AMS <Mark.Bradley@ams.usda.gov<mailto:Mark.Bradley@ams.usda.gov>>; Crail, Lars - AMS <Lars.Crail@ams.usda.gov<mailto:Lars.Crail@ams.usda.gov>>

Cc: Elizabeth.Leonardi-FASContact <leonardiev@state.gov<mailto:leonardiev@state.gov>>; Holmes, Vella - AMS <Vella.Holmes@ams.usda.gov<mailto:Vella.Holmes@ams.usda.gov>>; Regalado, Andrew - AMS <Andrew.Regalado@ams.usda.gov<mailto:Andrew.Regalado@ams.usda.gov>>; Rakola, Betsy - AMS (OCIO) <Betsy.Rakola@ams.usda.gov<mailto:Betsy.Rakola@ams.usda.gov>>

Subject: RE: Turkish Ministry of Ag warning on fake organic certificates

Hi Mark,

I wanted to touch base with you about our previous email exchange on March 14. (b) (5)

(b) (5)

Regards,

Kim

Kimberly Sawatzki

Agricultural Counselor

US Embassy Ankara

Tel +90 312 457 7383

Cell (b) (6)

Official - SBU

UNCLASSIFIED

From: Bradley, Mark - AMS [mailto:Mark.Bradley@ams.usda.gov]



(b) (5)

Thanks!

Kim

Kimberly Sawatzki

Agricultural Counselor

US Embassy Ankara

Tel +90 312 457 7383

Cel (b) (6)

Official - SBU

UNCLASSIFIED

From: Bradley, Mark - AMS [mailto:Mark.Bradley@ams.usda.gov]

Sent: Tuesday, March 14, 2017 4:33 PM

To: Sawatzki, Kimberly S; Crail, Lars - AMS

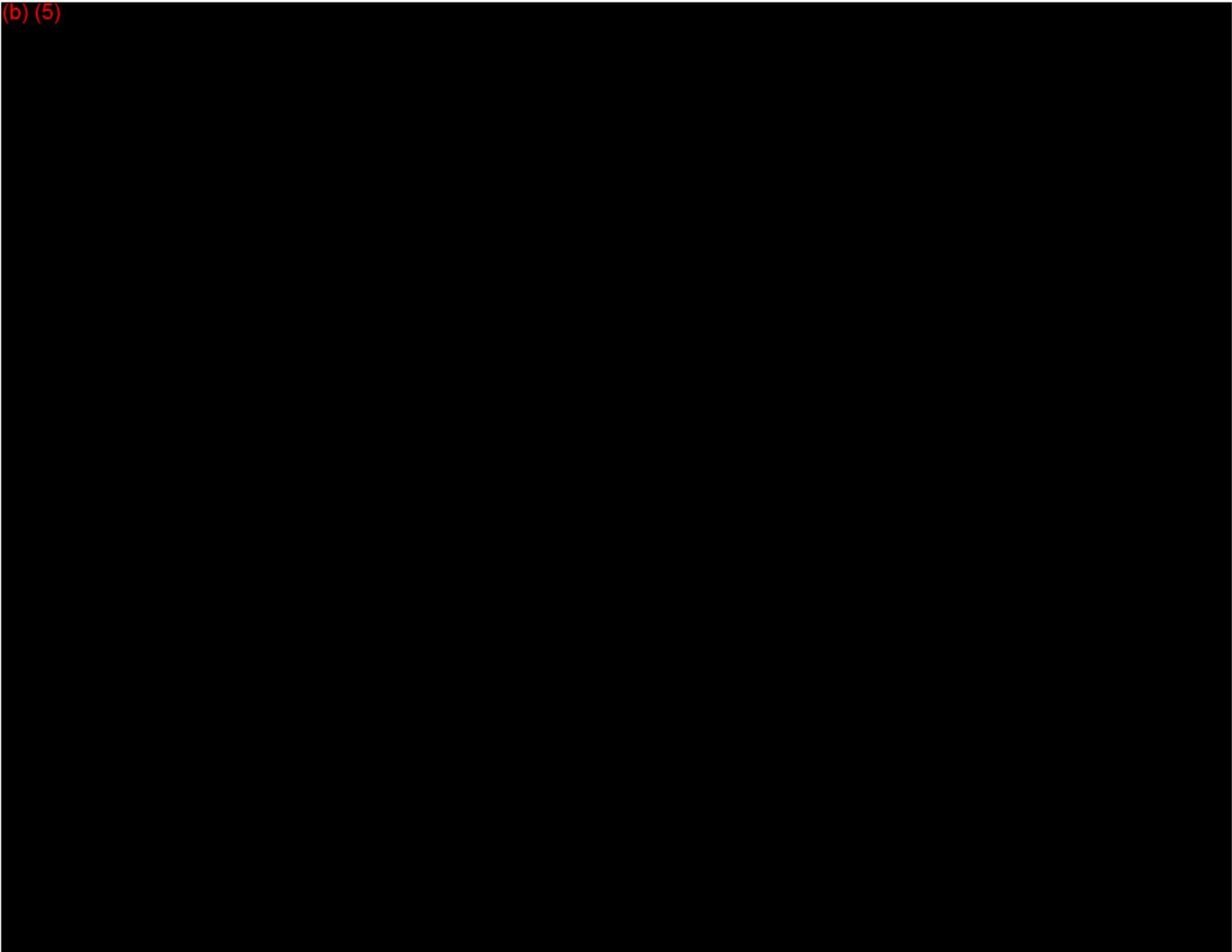
Cc: Leonardi, Elizabeth V; Holmes, Vella - AMS; Regalado, Andrew - AMS

Subject: RE: Turkish Ministry of Ag warning on fake organic certificates

Hi Kim,

Thank you very much for forwarding this information.

(b) (5)



Thank you again for your assistance.

Sincerely,

Mark

[cid:image001.jpg@01CDDDED.0B17A8E0]

Mark A. Bradley | Assistant to the Deputy Administrator | 202.690.0725 | FAX 202.205.7808 | Cell (b) (6) SDA  
– AMS – NATIONAL ORGANIC PROGRAM | 1400 Independence Ave. SW | Washington, DC 20250 Become an NOP



(b) (5)

Regards,

Kim

Kimberly Sawatzki

Agricultural Counselor

US Embassy Ankara

Tel +90 312 457 7383

Cell (b) (6)

Official - SBU

UNCLASSIFIED

From: Ozbag, Nergiz

Sent: Tuesday, March 14, 2017 10:33 AM

To: Leonardi, Elizabeth V; Sawatzki, Kimberly S

Subject: Muharrem Selcuk's is warning that exported corn is not organic

Hi Kim & Elizabeth,

(b) (5)

(b) (5)

Nergiz

Official

UNCLASSIFIED

From: Muharrem SELCUK [mailto:muharrem.selcuk@tarim.gov.tr]

Sent: Tuesday, March 14, 2017 10:13 AM

To: Ozbag, Nergiz

Subject: m?s?s?r

Lütfen bu e-postay?; yazd?rmadan ?nce çevrenizi dü?ünün. | Please consider the environment before printing this e-mail.

YASAL UYARI :Bu e-posta mesaj? ve onunla iletilen tüm ekler, g?nderildi?i ki?i ya da kuruma ?zel olup, gizli imtiyazl?,?zel bilgiler içerebilece?i gibi gizlilik yükümlülü?ü de ta??yor olabilir. Devam? için t?klay?n?z...<<http://www.tarim.gov.tr/Sayfalar/Detay.aspx?Sayfald=24>>

DISCLAIMER :This e-mail and all the annexes attached to it are dedicated to the persons or institutions they have been sent to and they may contain confidential, privileged special information as well as confidentiality obligation. Click For More...<<http://www.tarim.gov.tr/Sayfalar/Detay.aspx?Sayfald=24>>

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Official - SBU

UNCLASSIFIED



**ДЕРЖАВНА СЛУЖБА  
УКРАЇНИ З ПИТАНЬ  
БЕЗПЕЧНОСТІ ХАРЧОВИХ  
ПРОДУКТІВ ТА ЗАХИСТУ  
СПОЖИВАЧІВ**

**Держпродспоживслужба**  
вул. Б. Грінченка, 1, м. Київ, 01001  
тел. 279-12-70, факс 279-48-83  
web: [www.consumer.gov.ua](http://www.consumer.gov.ua)  
код ЄДРПОУ 39924774  
e-mail: [info@consumer.gov.ua](mailto:info@consumer.gov.ua)

**STATE SERVICE OF  
UKRAINE ON FOOD SAFETY  
AND CONSUMER  
PROTECTION  
SSUFSCP**

1, B.Hrinchenko str., Kyiv 01001  
tel. +38(044)279-12-70  
fax +38(044)279-48-83  
web: [www.consumer.gov.ua](http://www.consumer.gov.ua)  
e-mail: [info@consumer.gov.ua](mailto:info@consumer.gov.ua)

*21.04.2017* № *1311/2516-17*

На № \_\_\_\_\_ від \_\_\_\_\_

**Посольство США в Україні  
Закордонна  
сільськогосподарська служба  
Міністерства сільського  
господарства США  
Аташе з питань сільського  
господарства**

**пану Дуайту Уайлдеру**

Шановний пане Уайлдер !

Державна служба України з питань безпеки харчових продуктів та захисту споживачів висловлює Вам задоволення у високій повазі та на запит від 03.04.2017 № 5 стосовно автентичності фітосанітарних сертифікатів від 31.03.2016 № 75/15-036/ВХ-500973, від 08.05.2016 № 75/14-040/ВХ-083763, від 04.05.2016 № 75/15-010/ВХ-468423, від 08.10.2016 № 60/15-6 054/ХХ-181135, виданих на партії соєвих бобів, інформує.

Усі зазначені фітосанітарні сертифікати, копії яких додаються, видавались Держпродспоживслужбою. і являються дійсними.

Разом з цим, інформація щодо соєвих бобів, імпортованих з Республіки Туреччина до США у супроводі зазначених фітосанітарних сертифікатів, Держпродспоживслужбі не відома.

Користуємося нагодою, щоб поновити Міністерству сільського господарства США задоволення у високій повазі та висловити сподівання щодо подальшої плідної співпраці між нашими службами.

Додаток: на 4 арк.

**Перший заступник Голови**

(b) (6)

**Андрій ЖУК**



**ДЕРЖАВНА СЛУЖБА  
УКРАЇНИ З ПИТАНЬ  
БЕЗПЕЧНОСТІ ХАРЧОВИХ  
ПРОДУКТІВ ТА ЗАХИСТУ  
СПОЖИВАЧІВ**

**Держпродспоживслужба**  
вул. Б. Грінченка, 1, м. Київ, 01001  
тел. 279-12-70, факс 279-48-83  
web: [www.consumer.gov.ua](http://www.consumer.gov.ua)  
код ЄДРПОУ 39924774  
e-mail: [info@consumer.gov.ua](mailto:info@consumer.gov.ua)

**STATE SERVICE OF  
UKRAINE ON FOOD SAFETY  
AND CONSUMER  
PROTECTION  
SSUFSCP**

1, B.Hrinchenko str., Kyiv 01001  
tel. +38(044)279-12-70  
fax +38(044)279-48-83  
web: [www.consumer.gov.ua](http://www.consumer.gov.ua)  
e-mail: [info@consumer.gov.ua](mailto:info@consumer.gov.ua)

21.04.2017 № 1311/2516-17

На № \_\_\_\_\_ від \_\_\_\_\_

**Dwight Wilder**  
**Agricultural Attaché**  
**FAS-USDA**  
**Embassy of USA in Ukraine**

Dear Mr. Wilder,

The State Service of Ukraine on Food Safety and Consumer Protection (SSUFSCP) renews assurances of highest consideration to you and in response to the request dated of 03.04.2017 № 5 regarding the authenticity of the phytosanitary certificates dated of 31.03.2016 № 75/15-036/BX-500973, 08.05.2016 № 75/14-040/BX-083763, 04.05.2016 № 75/15-010/BX-468423, 08.10.2016 № 60/15-6 054/XX-181135, which were issued on the lots of soybeans, informs the following.

All of the mentioned phytosanitary certificates (copies are attached) were issued by SSUFSCP and are valid.

At the same time, information about what has happened to consignments with soybeans, which were imported from Turkey to USA, accompanied by specified phytosanitary certificates, is unknown for SSUFSCP.

We take the opportunity to renew to the United States Department of Agriculture the assurances of our highest respect and hope for further fruitful cooperation between our institutions.

Enclosure: on 4 pages.

Sincerely

**First Deputy Head**

(b) (6)

**Andrii ZHUK**

1. Експортер та його адреса  
Name and address of the exporter

"CLOV" LTD, APT. 505, 18/7 KUTUZOV STR.,  
KYIV, UKRAINE

2. ФІТОСАНІТАРНИЙ  
СЕРТИФІКАТ

PHYTOSANITARY CERTIFICATE

№ 75/ 15- 036/ ВХ - 500973

3. Імпортёр та його адреса  
Name and address of the importer

NAKAN AGRO DMCC  
CAMISERIF MAH. 5217 SOK. COGAL APT 3/8  
MERSIN / TURKEY

4. В організації карантину і захисту рослин  
TURKEY

(країна-імпортер)

To Quarantine and Plant Protection

Organization TURKEY (country of import)

5. Місце походження  
Place of origin UKRAINE

6. Пункт увезення  
Declared point of entry

MERSIN PORT - TURKEY

7. Спосіб транспортування  
Declared means of conveyance

M/V "NECO K"



УКРАЇНА  
UKRAINE

Державна ветеринарна та фітосанітарна  
служба України  
State Veterinary and Phytosanitary Service  
of Ukraine

8. Маркування, назва підкарантинного матеріалу, ботанічна назва рослини  
Marks, number and description of packages, name of produce, botanical name of plants

SOYBEANS IN BULK (GLYCINE MAX) CODE 1201

9. Кількість  
Quantity

(b) (4)

10. Цей сертифікат засвідчує, що зазначені вище рослини, рослинні продукти чи інші регульовані матеріали були перевірені та/або пройшли експертизу у відповідності до необхідних офіційних процедур і вважаються вільними від шкідливих організмів, що є карантинними для країни-імпортера, та відповідають двом фітосанітарним вимогам країни-імпортера, включаючи і регульовані некарантинні шкідливі організми.

This is to certify that the plants, plant products or other regulated articles described above have been inspected and/or tested according to appropriate official procedures and are considered to be free from the quarantine pests specified by the importing contracting party and to conform with the current phytosanitary requirements of the importing contracting party including those for regulated non-quarantine pests.

11. Додаткова декларація  
Additional declaration

NO

ЗНЕЗАРАЖЕННЯ  
Disinfestation and/or disinfection treatment

12. Обробка  
Treatment

Fumigation

13. Хімічна  
(діюча речовина)  
Chemical  
(active ingredient)

Alluminium phosphide  
(ALP)

14. Експозиція та температура  
Duration and temperature

5 days /  
120 hours

15. Концентрація  
Concentration

3,6 gr/m<sup>3</sup>

16. Дата  
Date

31 March 2016

18. Місце оформлення  
Place of issue

Ukraine, Odessa-port

Дата  
Date

31 March 2016

Прізвище держінспектора  
Name of authorized officer

Tsiganok E.V.

Підпис інспектора  
Signature of authorized officer

(b) (6)

Штамп  
Stamp

17. Додаткова інформація  
Additional information

Fumigation while dispatching. Fumigation certificate № 001/O d.d. 31.03.2016

1. Експортер та його адреса  
Name and address of the exporter

"RAW AGRO" LLC  
103, ARTEMA STR.  
KIEV, UKRAINE

2. ФІТОСАНІТАРНИЙ  
СЕРТИФІКАТ

PHYTOSANITARY CERTIFICATE

№ 75/15-010/BX-468423

3. Імпортёр та його адреса  
Name and address of the importer

HAKAN AGRO DMCC  
CAMISERIF MAH. 5217 SOK.  
COGAL APT 3/8  
MERSIN / TURKEY

4. В організації карантину і захисту рослин

TURKEY (країна-імпортер)

To Quarantine and Plant Protection

Organization TURKEY (country of import)

5. Місце походження

Place of origin UKRAINE

6. Пункт увезення  
Declared point of entry

MERSIN OR MARMARA PORT - TURKEY

7. Спосіб транспортування  
Declared means of conveyance

M/V "МОНАС"

УКРАЇНА  
UKRAINE



Державна ветеринарна та фітосанітарна  
служба України  
State Veterinary and Phytosanitary Service  
of Ukraine

8. Маркування, назва підкарантинного матеріалу, ботанична назва рослин  
Marks, number and description of packages, name of produce, botanical name of plants

SOYBEANS IN BULK (GLYCINE MAX) CODE 1201

9. Кількість  
Quantity

(b) (4)

10. Цей сертифікат засвідчує, що зазначені вище рослини, рослинні продукти чи інші регульовані матеріали були перевірені та/або пройшли експертизу у відповідності до необхідних офіційних процедур і вважаються вільними від шкідливих організмів, що є карантинними для країни-імпортера, та відповідають діючим фітосанітарним вимогам країни-імпортера, включаючи і регульовані некарантинні шкідливі організми.

This is to certify that the plants, plant products or other regulated articles described above have been inspected and/or tested according to appropriate official procedures and are considered to be free from the quarantine pests specified by the importing contracting party and to conform with the current phytosanitary requirements of the importing contracting party including those for regulated non-quarantine pests.

11. Додаткова декларація

Additional declaration **NO**

ЗНЕЗАРАЖЕННЯ  
Disinfestation and/or disinfection treatment

12. Обробка  
Treatment **FUMIGATION**

13. Хімічна  
(діюча речовина) **ALUMINIUM  
PHOSPHIDE  
TABLETS**  
Chemical  
(active ingredient)

14. Експозиція та  
температура  
Duration  
and temperature **96 HOURS  
t + 16 C**

15. Концентрація  
Concentration **3.6 gr./m<sup>3</sup>**

16. Дата  
Date  
**04 May 2016**

18. Місце оформлення  
Place of issue

**Ukraine, Odessa-port**

Дата  
Date **04 May 2016**

Прізвище держінспектора  
Name of  
authorized officer

**Gorbunova E.A.**

Підпис інспектора  
Signature of  
authorized officer

(b) (6)

17. Додаткова інформація  
Additional information

**Fumigation while dispatching. Fumigation  
certificate № 36/16 Odd 04.05.2016**

Штамп  
Stamp

1. Експортер та його адреса  
Name and address of exporter

LLC "ADM TRADING UKRAINE",  
APT. 16-A, PETRA SAHAYDACHNOGO,  
04070, KYIV, UKRAINE

2. ФІТОСАНІТАРНИЙ  
СЕРТИФІКАТ

PHYTOSANITARY CERTIFICATE

№ 60/ 15- 6 054/ XX - 181135

3. Імпорттер та його адреса  
Declared name and address of consignee

HAKAN AGRO DMCC  
CAMISERIF MAH. 5217 SOK.  
COGAL APT 3/8 MERSIN / TURKEY

4. До організації карантину і захисту рослин  
TURKEY (країна-імпортер)

Plant Protection  
Organization(s) of TURKEY (country of import)

5. Місце походження  
Place of origin UKRAINE

6. Пункт ввезення  
Declared point of entry

MERSIN OR MARMARA PORT - TURKEY

7. Спосіб транспортування  
Declared means of conveyance

M/V "CECELA S"



УКРАЇНА  
UKRAINE

Державна служба України з питань  
безпеки харчових продуктів та захисту  
споживачів

State Service of Ukraine on Food Safety  
and Consumer Protection

8. Маркування, кількість та опис пакування, найменування об'єкта регулювання,  
ботанічна назва рослин  
Distinguishing marks, number and description of packages, name of produce, botanical name of plants

SOYABEANS IN BULK (GLYCINE MAX) CODE 1201

9. Кількість  
Declared quantity

(b) (4)

10. Цей сертифікат засвідчує, що зазначені рослини, рослинні продукти чи інші об'єкти регулювання були перевірені та/або пройшли експертизу із застосуванням необхідних офіційних процедур, вважаються вільними від шкідливих організмів, що є карантинними для країни-імпортера, та відповідають діючим фітосанітарним вимогам країни-імпортера, включаючи регульовані некарантинні шкідливі організми.

This is to certify that the plants, plant products or other regulated articles described herein have been inspected and/or tested according to appropriate official procedures and are considered to be free from the quarantine pests specified by the importing contracting party and to conform with the current phytosanitary requirements of the importing contracting party including those for regulated non-quarantine pests.

11. Додаткова декларація  
Additional declaration

NO

ЗНЕЗАРАЖЕННЯ  
Disinfestation and/or disinfection treatment

12. Обробка  
Treatment FUMIGATION

13. Хімічна  
(діюча речовина) ALUMINIUM  
Chemical PHOSPHIDE  
(active ingredient) TABLETS

14. Експозиція та температура  
Duration 72 HOURS  
and temperature +17 °C

15. Концентрація/доза  
Concentration/dose 3.6 gr./m3

16. Дата  
Date 08 October 2016

18. Місце оформлення  
Place of issue Ukraine, Odessa-port

Дата  
Date 08 October 2016

Прізвище державного  
фітосанітарного інспектора  
Name of state phytosanitary inspector

Sledenko S.V.

Підпис державного  
фітосанітарного інспектора  
Signature of state phytosanitary inspector (b) (6)

МП  
Stamp

17. Додаткова інформація  
Additional information

Fumigation while dispatching. Fumigation  
Certificate № 72/16 O dd 08.10.2016

1. Назва історія та його адреса  
Name and address of the exporter

JPC "BILOVODSKY KHP"  
2 BILOVODS'KA STREET, VILLAGE BILOVOD,  
ROMENSKYI AREA, SUMY REGION, 42066

2. ФІТОСАНИТАРНИЙ  
СЕРТИФІКАТ

(PHYTOSANITARY CERTIFICATE)

№ 75/14-040/ВХ - 083763

3. Назва історія та його адреса  
Name and address of the importer

HAKAN AGRO DMCC  
CAMISERIF MAH. 5217 SOK. COGAL APT 3/8  
MERSIN / TURKEY

4. Виробництво карантинної продукції  
TURKEY (country of origin)

10. Quarantine and Plant Protection  
Organization TURKEY (country of import)

5. Місце походження  
Place of origin UKRAINE

6. Країна ввезення  
Country of entry  
TURKEY

UKRAINE  
UKRAINE



Державна ветеринарна та фітосанітарна  
служба України  
State Veterinary and Phytosanitary Service  
of Ukraine

7. Спосіб транспортування  
Means of conveyance  
MV "UZEYIR HAJIBEYLI"

8. Назва, кількість та детальної інформації про матеріал, ботанична назва рослини  
Name, amount and details of package, name of product, botanical name of plants  
SOYABEANS IN BULK -GLYCINE MAX (1201)

9. Коментар  
Comment

(b) (4)

10. Цей сертифікат видається, що зазначені вище рослини, рослинні продукти та інші регульовані матеріали були перевірені відповідно до вимог карантинної продукції згідно з вимогами вказаного в цьому сертифікаті країни-виробника та відповідають другим фітосанітарним вимогам країни-імпортера згідно з регульованими карантинними вимогами імпортера.

This is to certify that the plants, plant products or other regulated articles described above have been inspected and/or tested according to appropriate official procedures and are considered to be free from the quarantine pests specified by the importing contracting party, and to comply with the current phytosanitary requirements of the importing contracting party, including those for regulated non-quarantine pests.

11. Додаткова інформація  
Additional information

ЗГІДНО З  
ОРИГІНАЛОМ

12. Методи дезінфекції та/або обробки  
Methods of disinfection and/or treatment

14. Місце оформлення  
Place of issue  
UKRAINE, NIKOLAEV

13. Метод обробки  
Method of treatment  
FUMIGATION

15. Дата видачі  
Date of issue  
08 May 2016

13. Активна речовина (активний інгредієнт)  
Active ingredient  
ALUMINIUM PHOSPHIDE

14. Експозиція та температура  
Duration and temperature  
72 hours, t+16 C

16. Прізвище державного інспектора  
Name of authorized officer  
PARSENYUK

(b) (6)

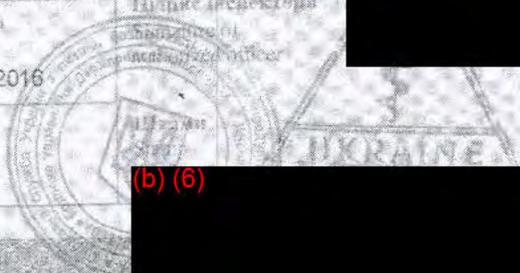
15. Концентрація  
Concentration  
3.0 GR/M3

16. Дата видачі  
Date of issue  
08 May 2016

17. Підпис державного інспектора  
Signature of authorized officer

17. Додаткова інформація  
Additional information  
FUMIGATION IN TRANSIT

(b) (6)





**Kiwa BCS Öko-Garantie GmbH**  
**Application Form for Transaction Certificates**

Name of Master Certificate Holder:	BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. Budak Mah. 10031 Nolu Cad. No:42 Yasem Is Merk. K:10 D:1016 -1017 Zip Code: 27090 Sehitkamil / Gaziantep - TURKEY
Master Certificate Number:	A-2016-00482 / 2016-05216
Trade name of the product and status (organic or under conversion to organic)	ORGANIC SOYBEANS, IN BULK
Harvest / production year:	2015
Agriculture / Producer of product:	Kaynak Sertifika no: HR-023-16-M/V NECO K ; HRU-024-16 M/V ICE DRAGON
The original certificate shall be sent to: (complete name and address and name of person in charge)	Will advise..
Is courier (DHL) service requested: (we only can trace letters sent by courier)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, who will bear the courier costs: (if possible, you can also give us a client no. of your courier, to charge it directly to your account)	BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. Budak Mah. 10031 Nolu Cad. No:42 Yasem Is Merk. K:10 D:1016 -1017 Zip Code: 27090 Sehitkamil / Gaziantep - TURKEY
Should we send a copy of the certificate in advance? (fax or e-mail address)	YES
Certificate shall be issued: (please refer to our fee-structure)	<input checked="" type="checkbox"/> within 5 working days (€ 41) <input type="checkbox"/> shorter time frame, until: (€ 82)
Payer of the certificate:	BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.

I have truthfully filled in all the information required and I have also enclosed copies of:

- Invoice No. (b) (4)
- Transport documents involved resp. will presented (b) (6)
- if relevant: Purchase invoice and Certificate of supplier / Tran

12.11.2016  
 (Date) (Stamp / Name, Address and Signature of Applicant)

CERTIFICATE OF INSPECTION FOR IMPORT OF PRODUCTS FROM ORGANIC PRODUCTION

1. Issuing body or authority (name and address) <b>bio.inspecta AG</b> Ackerstrasse CH- 5070 Frick Switzerland			
2. Serial number of the certificate of inspection HR-023-16			
3. Exporter (name and address) <b>Rus Agro Export Ltd.</b> Gastello STR. No, 10 Bataisk, 346880 Rostov Region Russia		4. Control body or control authority (name and address) <b>bio.inspecta AG</b> Ackerstrasse CH- 5070 Frick Switzerland	
5. Producer or preparer of the product (name and address) <b>Rus Agro Export Ltd.</b> Gastello STR. No, 10 Bataisk, 346880 Rostov Region Russia HRU-002		6. Country of dispatch <b>Russia</b>	
		7. Country of destination <b>Turkey</b>	
8. First consignee in the Community (name and address) <b>Hakan Gıda ve San. Dış Tic. Ltd.</b> Yalınayak Mh. Soda Bekirde Cd. 10100 Sk. No:95 MERSİN TÜRKİYE		9. Name and address of importer <b>BEYAZ AGRO İTH. İHR. SAN VE TİC. A.Ş.</b> MÜCAHİTLER MAH. 52009 NOLU CAD. NO:15 GÜNEŞ İŞ MRK. K:2 D:11 ŞEHİTKAMİL GAZİANTEP TÜRKİYE	
10. Marks and numbers. Container No(s). Number and kind. Trade name of the product			
Trade name of the product	net quality	unit	art. no/ lot no
Organic Soybeans	(b) (4)	kg	HRU-002
Invoice no: [REDACTED] Dated: 31.03.2016 BULK, Crop 2015			
B/L No: 1 B/L date: 31.03.2016 Vessel: M/V NECO K HS code; 1201.90.00			
11. Declared quantity Net: (b) (4)			
12. Declaration of body or authority issuing the certificate referred to in box 1  This is to certify that the products designated above have been obtained in accordance with rules of production and inspection of the organic production method which are considered equivalent in accordance with the standards equivalent to provisions of Regulation (EC) No 834/2007 and USDA-NOP.  Date 03.05.2015  Name and signature of authorised person  (b) (6)  Nina BAFIKIR MUTLU			
		Stamp of issuing authority or body  <b>bio inspecta</b>  Ackerstrasse Postfach CH-5070 Frick	

CERTIFICATE OF INSPECTION FOR IMPORT OF PRODUCTS FROM ORGANIC PRODUCTION

1. Issuing body or authority (name and address) <b>bio.inspecta AG</b> Ackerstrasse CH- 5070 Frick Switzerland																	
2. Serial number of the certificate of inspection <b>HR-024-16</b>																	
3. Exporter (name and address) <b>Rus Agro Export Ltd.</b> Gastello STR. No, 10 Bataisk, 346880 Rostov Region Russia	4. Control body or control authority (name and address) <b>bio.inspecta AG</b> Ackerstrasse CH- 5070 Frick Switzerland																
5. Producer or preparer of the product (name and address) <b>Rus Agro Export Ltd.</b> Gastello STR. No, 10 Bataisk, 346880 Rostov Region Russia HRU-001, HRU-002	6. Country of dispatch <b>Russia</b>																
	7. Country of destination <b>Turkey</b>																
8. First consignee in the Community (name and address) <b>Hakan Gıda ve San. Dış Tic. Ltd.</b> Yalınayak Mh. Soda Bekirde Cd. 10100 Sk. No:95 MERSİN TÜRKİYE	9. Name and address of importer <b>BEYAZ AGRO İTH. İHR. SAN VE TİC. A.Ş.</b> MÜCAHİTLER MAH. 52009 NOLU CAD. NO:16 GÜNEŞ İŞ MRK. K:2 D:11 ŞEHİTKAMİL GAZİANTEP TÜRKİYE																
10. Marks and numbers. Container No(s). Number and kind. Trade name of the product	11. Declared quantity																
<table border="1"> <tr> <td>Trade name of the product</td> <td>net weight</td> <td>unit</td> <td>art. no/ lot no</td> </tr> <tr> <td><b>Organic So (b) (4)</b></td> <td><b>(b) (4)</b></td> <td>kg</td> <td>HRU-001, HRU-002</td> </tr> <tr> <td>Invoice no:</td> <td colspan="3">Dated: 17.03.2016 BULK, Crop 2015</td> </tr> <tr> <td colspan="4">B/L No: 1 B/L date: 17.03.2016 Vessel: ICE DRAGON HS code: 1201.90.00</td> </tr> </table>	Trade name of the product	net weight	unit	art. no/ lot no	<b>Organic So (b) (4)</b>	<b>(b) (4)</b>	kg	HRU-001, HRU-002	Invoice no:	Dated: 17.03.2016 BULK, Crop 2015			B/L No: 1 B/L date: 17.03.2016 Vessel: ICE DRAGON HS code: 1201.90.00				Net: <b>(b) (4)</b>
Trade name of the product	net weight	unit	art. no/ lot no														
<b>Organic So (b) (4)</b>	<b>(b) (4)</b>	kg	HRU-001, HRU-002														
Invoice no:	Dated: 17.03.2016 BULK, Crop 2015																
B/L No: 1 B/L date: 17.03.2016 Vessel: ICE DRAGON HS code: 1201.90.00																	
12. Declaration of body or authority issuing the certificate referred to in box 1  This is to certify that the products designated above have been obtained in accordance with rules of production and inspection of the organic production method which are considered equivalent in accordance with the standards equivalent to provisions of Regulation (EC) No 834/2007 and USDA-NOP.  Date <b>03.05.2015</b>  Name and signature of authorised person  <b>(b) (6)</b>  <b>Nina BAFIKIR MUTLU</b>																	
<p style="text-align: right;">Stamp of issuing authority or body</p> <p style="text-align: center;"><b>bio inspecta</b>  Ackerstrasse Postfach CH-5070 Frick</p>																	



# Beyaz Agro

ITH. İHR. SAN. VE TİC. A. Ş.

Invoice No 24061\_01  
COMMERCIAL INVOICE

**Customer Name:** AGROPEX INTERNATIONAL INC.

**Address:** 413 SOUTH MAIN STREET BROADWAY, VA 22815 USA

**Telephone:** +1 540-246-3231

**Fax:**

**Invoice Date:** 3.11.2016

**Cstmr. Order No:** -

**Attention:** (b) (6)

**Delivery Terms:** CIF - STOCKTON PORT - USA

QUANTITY	DESCRIPTION OF THE GOODS	UNIT PRICE	TOTAL
(b) (4)	ORGANIC SOYBEANS, IN BULK Packed in 1 UNITS		

- VESSEL NAME : M/V FOUR DIAMOND  
- SELLER ORDER NO : BYTSON15363  
- B/L NO : 1 / DTD.03.11.2016  
- HOLD NO : 1  
- CUSTOMER LOT NO : LT0050128  
- FARMER CODE (LOT NO) : HRU-001; HRU-002  
- HS CODE : 1201.90.00

Description
CIF - STOCKTON PORT - USA

<b>Total:</b>
<b>Payment:</b>
<b>Subtotal:</b>

\*\*\*

**Total Net Weight:**  
**Total Gross Weight:**  
**Contract Number:**

(b) (4)  
BYTSCN15183

**Beneficiary Bank:** YAPI VE KREDİ BANKASI A.Ş.  
**Branch:** GAZİANTEP BRANCH  
**IBAN:** TR04 0006 7010 0000 0091 2768 32  
**Account No:** 91276832  
**Swift Code:** YAPITRISXXX  
**Payment:** 100% CASH AGAINST GOODS

(b) (6)

Budak Mah. 10031 Nolu Sok. No: 42 Yasem İş Mrk. Kat: 10 Daire: 1016-1017  
Zip Code : 27090 Şehitkamil - GAZİANTEP / TÜRKİYE

T: +90 342 324 44 47 / F: +90 342 323 35 65

www.beyazagro.com / info@beyazagro.com

**BILL OF LADING B/L No. 1**

TO BE USED WITH CHARTER PARTIES  
REFERENCE NO.

SCAC CODE: DPLW

Shipper:

BEYAZ AGRO ITH. IHR.SAN.VE TIC. A.Ş.  
BUDAK MAH. 10031 NOLU SOK. NO:42  
YASEM IS MERKEZI KAT:10 D:1016-1017  
SEHITKAMIL - GAZIANTEP - TURKEY

Consignee:

AGROPEX INTERNATIONAL INC.  
413 SOUTH MAIN STREET  
BROADWAY, VA 22815 USA  
PHONE: +1 540-246-3231

Notify address:

NOTIFY 1: DFI ORGANICS INC.  
575 LEXINGTON AVENUE, 4FTH FLOOR.  
NEW YORK, NY 10022 USA  
TEL: +1 888 970 9993  
logistics@dfiorganics.com

NOTIFY 2:HOYT SHEPSTON INC.  
161 STARLITE STREET, UNIT A  
SOUTH SAN FRANCISCO, CA 94080  
TEL: (650) 636-0087  
FAX: (650) 952-5691  
Brenda@hoyt-shepston.com

**FIRST ORIGINAL**

Vessel

M/V "FOUR DIAMOND"

Port of loading

MERSIN PORT - TURKEY

Port of discharge

STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1 - USA

Shipper's description of goods

Gross Weight

ORGANIC SOYBEANS, IN BULK

(b) (4)

- FARMER CODE (LOT NO): HRU-001;HRU-002
- CROP YEAR: 2015
- HS CODE: 1201.90.00
- SELLER ORDER NO: BYTSON15363
- COMMERCIAL INVOICE NO: (b) (4)
- CUSTOMER LOT NO: LT0050128
- HOLD 1

CLEAN ON BOARD

FREIGHT PAYABLE AS PER CHARTER PARTY

(of which none on deck at Shipper's risk; the Carrier not being responsible for loss or damage howsoever arising)

Freight payable as per

CHARTER PARTY DATED DD 07.10.2016

FREIGHT ADVANCE

Received on account of freight

Time used for loading            days            hours

SHIPPED at the Port of Loading in apparent good order and condition on board the Vessel for carriage to the Port of Discharge or so near thereto as she may safely get the goods specified above.

Weight, measure, quality, quantity, condition, contents and value unknown.

IT WITNESSthat where of the Master or Agent of the said Vessel has signed the number of Bills of Lading indicated below all of this tenor and date, any one of which being accomplished the others shall be void.

FOR CONDITIONS OF CARRIAGE SEE OVERLEAF

Freight payable <b>FREIGHT PAYABLE AS PER CHARTER PARTY</b>	Place and <b>MERSIN PORT</b> M/V
Numbers of original Bs/L <b>3 (THREE)</b>	Sig <b>MR. PAULINO M.</b> OF "M/V FOUR DIAMOND"

(b) (6)



**CERTIFICATE NO: 21522/9925/AGRI/BD  
OF, HOLD CLEANLINESS**

MESSERS.

BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.Ş.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : ORGANIC SOYBEANS, IN BULK  
: FARMER CODE (LOT NO): HRU-001; HRU-002  
: HS CODE 1201.90.00  
: SELLER ORDER NO: BYTSON15363  
: COMMERCIAL INVOICE NO: (b) (4)  
: CUSTOMER LOT NO: LT0050128  
QUANTITY : HOLD 1: (b) (4) MT AS PER B/L NO 1  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.Ş. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS 1 : DFI ORGANICS INC. 575 LEXINGTON AVENUE, 4<sup>TH</sup> FLOOR NEW YORK,  
NY 10022 USA  
NOTIFY ADDRESS 2 : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.Ş." our inspectors have supervised the cargo "ORGANIC SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
HOLD INSPECTION	: 30.10.2016 at 11:15 - 12:45 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 - 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**HOLD CLEANS:** All cargo holds of the vessel were checked by our inspectors prior to loading and was found clean, dry, tightness, free from smell, free from alive or dead insects and previous cargo residues and suitable to load and carry the "ORGANIC SOYBEANS, IN BULK".

**Last three cargoes:**

- SOYBEANS IN BULK
- MAPGRADE FERTILIZER
- PHOSPHATE ROCK

The above figures reflect the findings at the time and place of loading only and this certificate does not  
from their contractual responsibilities.

**Gafta**

**GENERAL SURVEY GÖZETME LTD. ŞTİ.**  
K.Bakkalköy Yolu No: 27 Daire: 8 İçerenköy 34752 Ataşehir / İSTANBUL  
Tel : +90 216 572 22 41 (Pbx) Fax : +90 216 572 22 47  
www.generalsurvey.com.tr

(b) (6)  
**FOSFA**  
INTERNATIONAL



**CERTIFICATE NO: 21526/9925/AGRI/BD  
OF, SAMPLING**

MESSERS.

BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : ORGANIC SOYBEANS, IN BULK  
: FARMER CODE (LOT NO): HRU-001; HRU-002  
: HS CODE 1201.90.00  
: SELLER ORDER NO: BYTSON15363  
: COMMERCIAL INVOICE NO: (b) (4)  
: CUSTOMER LOT NO: LT0050128  
QUANTITY : HOLD 1: (b) (4) AS PER B/L NO 1  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS 1 : DFI ORGANICS INC. 575 LEXINGTON AVENUE, 4<sup>TH</sup> FLOOR NEW YORK,  
NY 10022 USA  
NOTIFY ADDRESS 2 : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN.  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "ORGANIC SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

**SAMPLING:** Samples for determination of physical and chemical properties of the goods were drawn during the whole course of loading according to GAFTA Rules. At the end of sampling sub-lot samples were mixed well, divided and final samples were prepared. All samples were sealed by our surveyors.

(b) (4) ORGANIC SOYBEANS, IN BULK, in bulk was loaded onto MV "FOUR DIAMOND" by BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. within the knowledge and appointment of Kiwa BCS. Composite samples were sealed for Hold#1 as GSI 020601 by General Survey Inspection Co.Ltd., were sent to Eurofinse Sofia/Germany by TNT (#502442883) according to BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S instructions.

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve the parties concerned from their contractual responsibilities.

(b) (6)



# Beyaz Agro

İTH. İHR. SAN. VE TİC. A. Ş.

Invoice No 24061\_02

## COMMERCIAL INVOICE

**Customer Name:** AGROPEX INTERNATIONAL INC.

**Invoice Date:** 3.11.2016

**Cstmr. Order No:** -

**Address:** 413 SOUTH MAIN STREET BROADWAY, VA 22815 USA

**Attention:** (b) (6)

**Telephone:** +1 540-246-3231

**Delivery Terms:** CIF - STOCKTON PORT - USA

**Fax:**

QUANTITY	DESCRIPTION OF THE GOODS	UNIT PRICE	TOTAL
(b) (4)	ORGANIC SOYBEANS, IN BULK Packed in 1 UNITS		

- VESSEL NAME : M/V FOUR DIAMOND  
- SELLER ORDER NO : BYTSON15363  
- B/L NO : 2 / DTD 03.11.2016  
- HOLD NO : 3  
- CUSTOMER LOT NO : LT0050129  
- FARMER CODE (LOT NO) : HRU-001; HRU-002  
- HS CODE : 1201.90.00

Description
CIF - STOCKTON PORT - USA

Total:  
Payment:  
Subtotal:

\*\*\*

\*\*\*

**Total Net Weight :**  
**Total Gross Weight :**  
**Contract Number :**

(b) (4)

BYTSCN15183

**Beneficiary Bank :** YAPI VE KREDİ BANKASI A.S.  
**Branch :** GAZİANTEP BRANCH  
**IBAN :** TR04 0006 7010 0000 0091 2768 32  
**Account No :** 91276832  
**Swift Code :** YAPITRISXXX (b) (6)  
**Payment :** 100% CASH

Budak Mah. 10031 Nolu Sok. No: 42 Yasem İş Mrk. Kat: 10 Daire: 1016  
Zip Code : 27090 Şehitkamil - GAZİANTEP / TURKEY

T: +90 342 324 44 47 / F: +90 342 323 35 65

www.beyazagro.com / info@beyazagro.com

**BILL OF LADING B/L No. 2**

TO BE USED WITH CHARTER PARTIES

REFERENCE NO.

SCAC CODE: DPLW

Shipper:

BEYAZ AGRO ITH. IHR.SAN.VE TIC. A.Ş.  
 BUDAK MAH. 10031 NOLU SOK. NO:42  
 YASEM IS MERKEZI KAT:10 D:1016-1017  
 SEHITKAMIL - GAZIANTEP - TURKEY

Consignee:

AGROPEX INTERNATIONAL INC.  
 413 SOUTH MAIN STREET  
 BROADWAY, VA 22815 USA  
 PHONE: +1 540-246-3231

Notify address:

NOTIFY 1: DFI ORGANICS INC.  
 575 LEXINGTON AVENUE, 4FTH FLOOR.  
 NEW YORK, NY 10022 USA  
 TEL: +1 888 970 9993  
 logistics@dfiorganics.com

NOTIFY 2:HOYT SHEPSTON INC.  
 161 STARLITE STREET, UNIT A  
 SOUTH SAN FRANCISCO, CA 94080  
 TEL: (650) 636-0087  
 FAX: (650) 952-5691  
 Brenda@hoyt-shepston.com

**FIRST ORIGINAL**

Vessel

M/V "FOUR DIAMOND"

Port of loading

MERSIN PORT - TURKEY

Port of discharge

STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1 - USA

Shipper's description of goods

Gross Weight

ORGANIC SOYBEANS, IN BULK

(b) (4)

- FARMER CODE (LOT NO): HRU-001;HRU-002
- CROP YEAR: 2015
- HS CODE: 1201.90.00
- SELLER ORDER NO: BYTSON15363
- COMMERCIAL INVOICE NO: (b) (4)
- CUSTOMER LOT NO: LT0050129
- HOLD 3

**CLEAN ON BOARD**

**FREIGHT PAYABLE AS PER CHARTER PARTY**

(of which none on deck at Shipper's risk; the Carrier not being responsible for loss or damage howsoever arising)

Freight payable as per

CHARTER PARTY DATED DD 07.10.2016

FREIGHT ADVANCE

Received on account of freight

Time used for loading

days

hours

SHIPPED at the Port of Loading in apparent good order and condition on board the Vessel for carriage to the Port of Discharge or so near thereto as she may safely get the goods specified above.

Weight, measure, quality, quantity, condition, contents and value unknown.

IF WITNESS where of the Master or Agent of the said Vessel has signed the number of Bills of Lading indicated below all of this tenor and date, any one of which being accomplished the others shall be void.

FOR CONDITIONS OF CARRIAGE SEE OVERLEAF

Freight payable	Place and date of issue
<b>FREIGHT PAYABLE AS PER CHARTER PARTY</b>	MERSIN PORT (b) (6)
Numbers of original Bs/L	MR. PAULINO M. R. OF "M/V FOUR DIA
3 (THREE)	



**CERTIFICATE NO: 21527/9925/AGRI/BD  
OF, HOLD CLEANLINESS**

MESSERS.  
BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : ORGANIC SOYBEANS, IN BULK  
: FARMER CODE (LOT NO): HRU-001; HRU-002  
: HS CODE 1201.90.00  
: SELLER ORDER NO: BYTSON15363  
: COMMERCIAL INVOICE NO: (b) (4)  
: CUSTOMER LOT NO: LT0050129  
QUANTITY : HOLD 3: (b) (4) AS PER B/L NO 2  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS 1 : DFI ORGANICS INC. 575 LEXINGTON AVENUE, 4<sup>TH</sup> FLOOR NEW YORK,  
NY 10022 USA  
NOTIFY ADDRESS 2 : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "ORGANIC SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
HOLD INSPECTION	: 30.10.2016 at 11:15 - 12:45 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 - 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**HOLD CLEANS:** All cargo holds of the vessel were checked by our inspectors prior to loading and was found clean, dry, tightness, free from smell, free from alive or dead insects and previous cargo residues and suitable to load and carry the "ORGANIC SOYBEANS, IN BULK".

**Last three cargoes:**

- SOYBEANS IN BULK
- MAPGRADE FERTILIZER
- PHOSPHATE ROCK

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve them from their contractual responsibilities.

**Gafta**

**GENERAL SURVEY GÖZETME LTD. ŞTİ.**  
K.Bakkalköy Yolu No: 27 Daire: 6 İçerenköy 34752 Ataşehir / İSTANBUL  
Tel : +90 216 572 22 41 (Pbx) Fax : +90 216 572 22 47  
www.generalsurvey.com.tr



**CERTIFICATE NO: 21531/9925/AGRI/BD  
OF, SAMPLING**

MESSERS.  
BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : ORGANIC SOYBEANS, IN BULK  
: FARMER CODE (LOT NO): HRU-001; HRU-002  
: HS CODE 1201.90.00  
: SELLER ORDER NO: BYTSON15363  
: COMMERCIAL INVOICE NO: (b) (4)  
: CUSTOMER LOT NO: LT0050129  
QUANTITY : HOLD 3: (b) (4) AS PER B/L NO 2  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1, USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS 1 : DFI ORGANICS INC. 575 LEXINGTON AVENUE, 4<sup>TH</sup> FLOOR NEW YORK,  
NY 10022 USA  
NOTIFY ADDRESS 2 : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "ORGANIC SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

**SAMPLING:** Samples for determination of physical and chemical properties of the goods were drawn during the whole course of loading according to GAFTA Rules. At the end of sampling sub-lot samples were mixed well, divided and final samples were prepared. All samples were sealed by our surveyors.

(b) (4) ORGANIC SOYBEANS, IN BULK, in bulk was loaded onto MV "FOUR DIAMOND" by BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. within the knowledge and appointment of Kiwa BCS. Composite samples were sealed for Hold#3 as GSI 020621 by General Survey Inspection Co.Ltd., were sent to Eurofiase Sofia/Germany by TNT (#502442883) according to BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S instructions.

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve the parties concerned from their contractual responsibilities.

(b) (6)



# Beyaz Agro

İTH. İHR. SAN. VE TİC. A. Ş.

Invoice No 24061\_03

## COMMERCIAL INVOICE

**Customer Name:** AGROPEX INTERNATIONAL INC.

**Invoice Date:** 3.11.2016

**Cstmr. Order No:** -

**Address:** 413 SOUTH MAIN STREET BROADWAY, VA 22815 USA

**Attention:** (b) (6)

**Telephone:** +1 540-246-3231

**Delivery Terms:** CIF - STOCKTON PORT - USA

**Fax:**

QUANTITY	DESCRIPTION OF THE GOODS	UNIT PRICE	TOTAL
(b) (4)	ORGANIC SOYBEANS, IN BULK Packed in 1 UNITS		

- VESSEL NAME : M/V FOUR DIAMOND  
- SELLER ORDER NO : BYTSON15363  
- B/L NO : 3 / DTD 03.11.2016  
- HOLD NO : 5  
- CUSTOMER LOT NO : LT0050130  
- FARMER CODE (LOT NO) : HRU-001; HRU-002  
- HS CODE : 1201.90.00

Description
CIF - STOCKTON PORT - USA

**Total:**  
**Payment:**  
**Subtotal:**

\*\*\* \*\*

**Total Net Weight:**  
**Total Gross Weight:**  
**Contract Number:**

(b) (4)  
BYTSCN15183

**Beneficiary Bank:** YAPI VE KREDİ BANKASI A.Ş.  
**Branch:** GAZİANTEP BRANCH  
**IBAN:** TR04 0006 7010 0000 0091 2768 32  
**Account No:** 91276832  
**Swift Code:** YAPITRISXXX  
**Payment:** 100% CASH AGAINST GOODS

(b) (6)

Budak Mah. 10031 Nolu Sok. No: 42 Yasem İş Mrk. Kat: 10 Daire: 10031  
Zip Code: 27090 Şehitkamil - GAZİANTEP / TURKEY

T: +90 342 324 44 47 / F: +90 342 323 35 65

www.beyazagro.com / info@beyazagro.com

**BILL OF LADING B/L No. 3**

TO BE USED WITH CHARTER PARTIES

REFERENCE NO.

SCAC CODE: DPLW

Shipper:

**BEYAZ AGRO ITH. IHR.SAN.VE TIC. A.Ş.**  
**BUDAK MAH. 10031 NOLU SOK. NO:42**  
**YASEM IS MERKEZI KAT:10 D:1016-1017**  
**SEHITKAMIL - GAZIANTEP - TURKEY**

Consignee:

**AGROPEX INTERNATIONAL INC.**  
**413 SOUTH MAIN STREET**  
**BROADWAY, VA 22815 USA**  
**PHONE: +1 540-246-3231**

Notify address:

**NOTIFY 1: DFI ORGANICS INC.**  
**575 LEXINGTON AVENUE, 4FTH FLOOR.**  
**NEW YORK, NY 10022 USA**  
**TEL: +1 888 970 9993**  
**logistics@dfiorganics.com**

**NOTIFY 2:HOYT SHEPSTON INC.**  
**161 STARLITE STREET, UNIT A**  
**SOUTH SAN FRANCISCO, CA 94080**  
**TEL: (650) 636-0087**  
**FAX: (650) 952-5691**  
**Brenda@hoyt-shepston.com**

**FIRST ORIGINAL**

Vessel	Port of loading
M/V "FOUR DIAMOND"	MERSIN PORT - TURKEY

Port of discharge  
**STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1 - USA**

Shipper's description of goods	Gross Weight
ORGANIC SOYBEANS, IN BULK	(b) (6)
- FARMER CODE (LOT NO): HRU-001;HRU-002 - CROP YEAR: 2015 - HS CODE: 1201.90.00 - SELLER ORDER NO: BYTSON15363 - COMMERCIAL INVOICE NO: (b) (4) - CUSTOMER LOT NO: LT0050130 - HOLD 5	

**CLEAN ON BOARD**  
**FREIGHT PAYABLE AS PER CHARTER PARTY**  
 (of which none on deck at Shipper's risk; the Carrier not being responsible for loss or damage howsoever arising)

Freight payable as per CHARTER PARTY DATED DD 07.10.2016  FREIGHT ADVANCE Received on account of freight  Time used for loading      days      hours	SHIPPED at the Port of Loading in apparent good order and condition on board the Vessel for carriage to the Port of Discharge or so near thereto as she may safely get the goods specified above. Weight, measure, quality, quantity, condition, contents and value unknown. IT WITNESS where of the Master or Agent of the said Vessel has signed the number of Bills of Lading indicated below all of this tenor and date, any one of which being accomplished the others shall be void. FOR CONDITIONS OF CARRIAGE SEE OVERLEAF
--	---

Freight payable <b>FREIGHT PAYABLE AS PER CHARTER PARTY</b>	Place and date of issue (b) (6) MERSIN PORT 07/10/2016
Numbers of original Bs/L <b>3 (THREE)</b>	MR. PAULINO M... OF "M/V FOUR D...

**CERTIFICATE NO: 21532/9925/AGRI/BD**  
**OF, HOLD CLEANLINESS**

MESSERS.

BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : ORGANIC SOYBEANS, IN BULK  
: FARMER CODE (LOT NO): HRU-001; HRU-002  
: HS CODE 1201.90.00  
: SELLER ORDER NO: BYTSON15363  
: COMMERCIAL INVOICE NO: (b) (4)  
: CUSTOMER LOT NO: LT0050130  
QUANTITY : HOLD 5: (b) (4) AS PER B/L NO 3  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS 1 : DFI ORGANICS INC. 575 LEXINGTON AVENUE, 4<sup>TH</sup> FLOOR NEW YORK,  
NY 10022 USA  
NOTIFY ADDRESS 2 : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "ORGANIC SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
HOLD INSPECTION	: 30.10.2016 at 11:15 - 12:45 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 - 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**HOLD CLEANS:** All cargo holds of the vessel were checked by our inspectors prior to loading and was found clean, dry, tightness, free from smell, free from alive or dead insects and previous cargo residues and suitable to load and carry the "ORGANIC SOYBEANS, IN BULK".

**Last three cargoes:**

- SOYBEANS IN BULK
- MAPGRADE FERTILIZER
- PHOSPHATE ROCK

The above figures reflect the findings at the time and place of loading only and this certificate does not release the cargo from their contractual responsibilities.



**GENERAL SURVEY GÖZETME LTD. ŞTİ.**  
K.Bakkalköy Yolu No: 27 Daire: 6 İçerenköy 34752 Ataşehir / İSTANBUL  
Tel : +90 216 572 22 41 (Pbx) Fax : +90 216 572 22 47  
www.generalsurvey.com.tr

(b) (6)

INTERNATIONAL

**CERTIFICATE NO: 21536/9925/AGRI/BD  
OF, SAMPLING**

MESSERS.

BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : ORGANIC SOYBEANS, IN BULK  
: FARMER CODE (LOT NO): HRU-001; HRU-002  
: HS CODE 1201.90.00  
: SELLER ORDER NO: BYTSON15363  
: COMMERCIAL INVOICE NO: (b) (4)  
: CUSTOMER LOT NO: LT0050130  
QUANTITY : HOLD 5: (b) (4) AS PER B/L NO 3  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS 1 : DFI ORGANICS INC. 575 LEXINGTON AVENUE, 4<sup>TH</sup> FLOOR NEW YORK,  
NY 10022 USA  
NOTIFY ADDRESS 2 : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA.94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "ORGANIC SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

**SAMPLING:** Samples for determination of physical and chemical properties of the goods were drawn during the whole course of loading according to GAFTA Rules. At the end of sampling sub-lot samples were mixed well, divided and final samples were prepared. All samples were sealed by our surveyors.

(b) (4) ORGANIC SOYBEANS, IN BULK, in bulk was loaded onto MV "FOUR DIAMOND" by BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. within the knowledge and appointment of Kiwa BCS. Composite samples were sealed for Hold#5 as GSI 020641 by General Survey Inspection Co.Ltd., were sent to Eurofinse Sofia/Germany by TNT (#502442883) according to BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S instructions.

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve the parties concerned from their contractual responsibilities.

(b) (6)

Record No.: DE-25457-25



# TRANSACTION CERTIFICATE

**KOPIE**

For Kiwa BCS use only. A product declaration for raw material or processed goods with the name of  
KIWA BCS ÖKO-GARANTIE GMBH or its guarantee is exclusively restricted to  
KIWA BCS ÖKO-GARANTIE GMBH certified operators!

The Certification Office of KIWA BCS ÖKO-GARANTIE GMBH, Marientorgraben 3-5, D-90402 Nuremberg, Germany

and the company BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.Ş., BUDAK MAH. 10031 NOLU CAD. NO:42 YASEM IS MERK. K:10 D:1016-1017 ZIP CODE: 27090 SEHITKAMIL / GAZIANTEP - TURKEY

herewith certify that the following products, delivered to AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY, VA 22815 USA  
Hakan Gıda Warehouse / MERSIN PORT TURKEY

ORGANIC SOYBEANS IN BULK, (b) (4) TOTAL NET, FARMER CODE (LOT NO): HRU-001, HRU-002/ Customer Lot No:LT0050128, Crop year: 2015, BIO INSPECTA CERTIFICATE NO:HR-023-016,HRU-024-16

INVOICE: (b) (4) dtd:03.11.2016  
B/L No:1 dtd: 03.11.2016  
Vessel No:M/V "FOUR DIAMOND" - Hold#1  
Delivery Date: 03.11.2016

was produced according to organic production methods in compliance to USDA-NOP final rule. This confirmation is based on the documents presented to KIWA BCS for this file.

Nuremberg, November 15<sup>th</sup>, 2016

(b) (6)

KIWA BCS ÖKO-GARANTIE GmbH  
Marientorgraben 3 - 5  
D-90402 Nürnberg  
T: +49 911 42 43 90  
F: +49 911 49 22 39



The Certification Office of  
KIWA BCS ÖKO-GARANTIE GMBH

## THE SUPPLIER

The delivery of ..... (date) of ..... kg of .....  
according to attached invoice No. .... date ..... corresponds with the  
above stated and certified quality.

.....  
(Place of supplier, date)

.....  
(Stamp and signature)

Record No.: DE-25457-26



# TRANSACTION CERTIFICATE

KOPIE

For Kiwa BCS use only. A product declaration for raw material or processed goods with the name of  
KIWA BCS ÖKO-GARANTIE GMBH or its guarantee is exclusively restricted to  
KIWA BCS ÖKO-GARANTIE GMBH certified operators!

The Certification Office of KIWA BCS ÖKO-GARANTIE GMBH, Marientorgraben 3-5, D-90402 Nuremberg, Germany

and the company BEYAZ AGRO ITH. IHR. SAN. VE TİC. A.Ş., BUDAK MAH. 10031 NOLU CAD. NO:42 YASEM IS MERK. K:10 D:1016-1017 ZIP CODE: 27090 SEHITKAMIL / GAZIANTEP - TURKEY

herewith certify that the following products, delivered to AGROPEX INTERNATIONAL INC.413,SOUTH MAIN STREET BROADWAY, VA 22815 USA  
Hakan Gıda Warehouse / MERSIN PORT TURKEY

ORGANIC SOYBEANS IN BULK, (b) (4) TOTAL NET, FARMER CODE (LOT NO):  
HRU-001, HRU-002 / Customer Lot No:LT0050129, Crop year: 2015,  
BIO INSPECTA CERTIFICATE NO:HR-023-016,HRU-024-16

INVOICE: (b) (4) dtd:03.11.2016  
B/L No:2 dtd: 03.11.2016  
Vessel No:M/V"FOUR DIAMOND" Hold#3  
Delivery Date: 03.11.2016

was produced according to organic production methods in compliance to USDA-NOP final rule.  
This confirmation is based on the documents presented to KIWA BCS for this file.

Nuremberg, November 15<sup>th</sup>, 2016

(b) (6)

KIWA BCS ÖKO-GARANTIE GmbH  
Mariantorgraben 3 - 5  
D-90402 Nürnberg  
T: +49 911 42 43 90  
F: +49 911 49 22 59



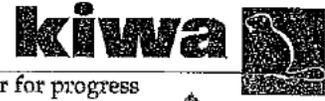
The Certification Office of  
KIWA BCS ÖKO-GARANTIE GMBH

## THE SUPPLIER

The delivery of ..... (date) of ..... kg of .....  
according to attached invoice No. .... date ..... corresponds with the  
above stated and certified quality.

.....  
(Place of supplier, date)

.....  
(Stamp and signature)



# TRANSACTION CERTIFICATE

KOPIE

For Kiwa BCS use only. A product declaration for raw material or processed goods with the name of  
KIWA BCS ÖKO-GARANTIE GMBH or its guarantee is exclusively restricted to  
KIWA BCS ÖKO-GARANTIE GMBH certified operators!

The Certification Office of KIWA BCS ÖKO-GARANTIE GMBH, Marientorgraben 3-5, D-90402 Nuremberg, Germany

and the company BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.Ş., BUDAK MAH. 10031 NOLU CAD. NO:42 YASEM IS MERK. K:10 D:1016-1017 ZIP CODE: 27090 SEHITKAMIL / GAZIANTEP - TURKEY

herewith certify that the following products, delivered to AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY, VA 22815 USA  
Hakan Gıda Warehouse / MERSIN PORT TURKEY

ORGANIC SOYBEANS IN BULK (b) (4) TOTAL NET, FARMER CODE (LOT NO):  
HRU-001, HRU-002 / Customer Lot No: LT0050130, Crop year: 2015,  
BIO INSPECTA CERTIFICATE NO:HR-023-016,HRU-024-16

INVOICE: (b) (4) dtd:03.11.2016  
B/L No:3 dtd: 03.11.2016  
Vessel No:M/V "FOUR DIAMOND" Hold#5  
Delivery Date: 03.11.2016

was produced according to organic production methods in compliance to USDA-NOP final rule.  
This confirmation is based on the documents presented to KIWA BCS for this file.

Nuremberg, November 15<sup>th</sup>, 2016

(b) (6)

The Certification Office of  
KIWA BCS ÖKO-GARANTIE GMBH

KIWA BCS ÖKO-GARANTIE GmbH  
Mariantorgraben 3 - 5  
D-90402 Nürnberg  
T: +49 911 42 43 90  
F: +49 911 49 22 39



## THE SUPPLIER

The delivery of ..... (date) of ..... kg of .....  
according to attached invoice No. .... date ....., corresponds with the  
above stated and certified quality.

.....  
(Place of supplier, date)

.....  
(Stamp and signature)



# Beyaz Agro

İTH. İHR. SAN. VE TİC. A. Ş.

Invoice No 24061\_01

## COMMERCIAL INVOICE

**Customer Name:** AGROPEX INTERNATIONAL INC.

**Invoice Date:** 3.11.2016

**Cstmr. Order No:** -

**Address:** 413 SOUTH MAIN STREET BROADWAY, VA 22815 USA

**Attention:** (b) (6)

**Telephone:** +1 540-246-3231

**Delivery Terms:** CIF - STOCKTON PORT - USA

**Fax:**

QUANTITY	DESCRIPTION OF THE GOODS	UNIT PRICE	TOTAL
(b) (4)	NON GMO SOYBEANS, IN BULK Packed in 1 UNITS	(b) (4)	(b) (4)

- VESSEL NAME : M/V FOUR DIAMOND  
 - SELLER ORDER NO : BYTSON15363  
 - B/L NO : 1 / DTD 03.11.2016  
 - HOLD NO : 1  
 - CUSTOMER LOT NO : LT0050128  
 - FARMER CODE (LOT NO) : HRU-001; HRU-002  
 - HS CODE : 1201.90.00

Description
CIF - STOCKTON PORT - USA

<b>Total:</b>	(b) (4)
<b>Payment:</b>	
<b>Subtotal:</b>	

\*\*\* Three Million Two Hundred Seven Thousand Seven Hundred Seventy One USD and No Cents. \*\*\*

**Total Net Weight:**  
**Total Gross Weight:**  
**Contract Number:**

(b) (4)  
 BYTSON15363

**Beneficiary Bank:** YAPI VE KREDİ BANKASI A.Ş.  
**Branch:** GAZİANTEP BRANCH  
**IBAN:** TR04 0006 7010 0000 0091 2768 32  
**Account No:** 91276832  
**Swift Code:** YAPITRISXXX  
**Payment:** 100% CASH AGAINST GOODS

(b) (6)

Budak Mah. İCBI Nolu Sok. No: 42 Yasem İş Mrk. Katıo Bahçe-1016-1017

Zip Code: 27090 Şehitkamil - GAZİANTEP / TURKEY

T: +90 342 324 44-47 / F: +90 342 323 35 65

www.beyazagro.com / info@beyazagro.com

Shipper:

BEYAZ AGRO ITH. IHR.SAN.VE TIC. A.Ş.  
BUDAK MAH. 10031 NOLU SOK. NO:42  
YASEM IS MERKEZI KAT:10 D:1016-1017  
SEHITKAMIL - GAZIANTEP - TURKEY

TO BE USED WITH CHARTER PARTIES

REFERENCE NO.

SCAC CODE: DPLW

Consignee:

AGROPEX INTERNATIONAL INC.  
413 SOUTH MAIN STREET  
BROADWAY, VA 22815 USA  
PHONE: +1 540-246-3231

Notify address:

HOYT SHEPSTON INC.  
161 STARLITE STREET, UNIT A  
SOUTH SAN FRANCISCO, CA 94080  
TEL: (650) 636-0087  
FAX: (650) 952-5691  
Brenda@hoyt-shepston.com

Vessel

M/V "FOUR DIAMOND"

Port of loading

MERSIN PORT - TURKEY

Port of discharge

STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1 - USA

Shipper's description of goods

Gross Weight

NON GMO SOYBEANS, IN BULK

(b) (4)

- FARMER CODE (LOT NO): HRU-001;HRU-002
- HS CODE: 1201.90.00
- SELLER ORDER NO: BYTSON15363
- COMMERCIAL INVOICE NO (b) (4)
- CUSTOMER LOT NO: LT0050128
- HOLD 1

**CLEAN ON BOARD**  
**FREIGHT PAYABLE AS PER CHARTER PARTY**

(of which none on deck at Shipper's risk; the Carrier not being responsible for loss or damage howsoever arising)

Freight payable as per  
CHARTER PARTY DATED DD 07.10.2016

FREIGHT ADVANCE  
Received on account of freight

Time used for loading            days            hours

SHIPPED at the Port of Loading in apparent good order and condition on board the Vessel for carriage to the Port of Discharge or so near thereto as she may safely get the goods specified above.  
Weight, measure, quality, quantity, condition, contents and value unknown.  
IT WITNESSE where of the Master or Agent of the said Vessel has signed the number of Bills of Lading indicated below all of this tenor and date, any one of which being accomplished the others shall be void.  
FOR CONDITIONS OF CARRIAGE SEE OVERLEAF

Freight payable <b>FREIGHT PAYABLE AS PER CHARTER PARTY</b>	Place and date of issue <b>MERSIN PORT XX.10.2016</b>
Numbers of original Bs/L <b>3 (THREE)</b>	Signature <b>MR. XXXX AS MASTER OF "M/V FOUR DIAMOND"</b>

**CERTIFICATE NO: 21522/9925/AGRI/BD**  
**OF, HOLD CLEANLINESS**

MESSERS.

BEYAZ AGRO İTH. İHR. SAN. VE TIC. A.Ş.  
SEHİTKAMİL/GAZİANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
: HS CODE 1201.90.00  
: SELLER ORDER NO: BYTSON15363  
: COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 1, (b) (4) AS PER B/L NO 1  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO İTH. İHR. SAN. VE TIC. A.Ş. BÜDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM İS MERKEZİ KAT:10 D:1016-1017 SEHİTKAMİL -  
GAZİANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO İTH. İHR. SAN. VE TIC. A.Ş." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
HOLD INSPECTION	: 30.10.2016 at 11:15 - 12:45 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 - 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**HOLD CLEANS:** All cargo holds of the vessel were checked by our inspectors prior to loading and was found clean, dry, tightness, free from smell, free from alive or dead insects and previous cargo residues and suitable to load and carry the "NON GMO SOYBEANS, IN BULK".

**Last three cargoes:**

- SOYBEANS IN BULK
- MAPGRADE FERTILIZER
- PHOSPHATE ROCK

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve the parties concerned from their contractual responsibilities.

**CERTIFICATE NO: 21524/9925/AGRI/BD**

**OF, WEIGHT**

MESSERS.  
BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 1 (b) (4) AS PER B/L NO 1  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 - 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**LOADING SUPERVISION:** Cargo was transported from trucks by means of crane into the vessel holds under our representative's supervision.

**WEIGHT:** Weight determination was effected by weighing each truck empty and full over the customs weighbridge during the whole course of loading and following result was found;

(b) (4) NON GMO SOYBEANS, IN BULK

The above figures reflect the findings at the time and place of loading only and this certificate does not release the parties from their contractual responsibilities.



**GENERAL SURVEY GÖZETME LTD. ŞTİ.**  
K.Bakkalköy Yolu No: 27 Daire: 6 İçerenköy 34752 Ataşehir / İSTANBUL  
Tel : +90 216 572 22 41 (Pbx) Fax : +90 216 572 22 47  
www.generalsurvey.com.tr

(b) (6)

**CERTIFICATE NO: 21523/9925/AGRI/BD  
 OF, QUALITY**

MESSERS.  
 BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
 COMMODITY : NON GMO SOYBEANS, IN BULK  
 :HS CODE 1201.90.00  
 :SELLER ORDER NO: BYTSON15363  
 :COMMERCIAL INVOICE: (b) (4)  
 QUANTITY : HOLD 1: (b) (4) AS PER B/L NO 1  
 LOADING PORT : MERSIN, TURKEY  
 DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
 SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
 NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
 GAZIANTEP - TURKEY  
 CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
 VA 22815 USA  
 NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
 FRANCISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

**LOADING SUPERVISION:** Cargo was transported from trucks by means of crane into the vessel holds under our representative's supervision.

**SAMPLING:** According to GAFTA No.124, increment samples were drawn uniformly and systematically, concurrently with loading of the vessel. The samples which were taken according to GAFTA were thoroughly mixed into a bulk sample. The bulk sample was divided into lot samples and final sample was also prepared by mixing lot samples together in proportion to the weight represented by each sample.

**QUALITY:** One set of the composite representative samples was expedited to our GAFTA laboratory in Istanbul/ TURKEY for analysis and our results are follows:

PROTEIN (Nx6.25 DM)	38,42
FOREIGN MATTER	0,49
MOISTURE	11,43
FAT (DM)	21,85
BROKEN & SPLIT	4,25
BUG DAMAGED	none
ALIVE INSECTS & EXCRETA	none

(b) (6)

**CERTIFICATE NO: 21525/9925/AGRI/BD**  
**OF, HOLD SEALING**

MESSERS.  
BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHTKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD I: (b) (4) AS PER B/L NO 1  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHTKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

HOLD NO	DESCRIPTION	SEAL NO	SEALED BY
1	HATCH COVER	GSI 017440	GENERAL SURVEY
1	MANHOLE FORWARD	GSI 0012802	GENERAL SURVEY
1	MANHOLE AFT	GSI 0012803	GENERAL SURVEY

The above figures reflect the findings at the time and place of loading only and this certificate does not reflect (b) (6) from their contractual responsibilities.



# Beyaz Agro

İTH. İHR. SAN. VE TİC. A. Ş.

Invoice No **24061\_02**

## COMMERCIAL INVOICE

Customer Name: AGROPEX INTERNATIONAL INC.

Invoice Date: 3.11.2016

Cstmr. Order No: -

Address: 413 SOUTH MAIN STREET BROADWAY, VA 22815 USA

Attention: (b) (6)

Telephone: +1.540-246-3231

Delivery Terms: CIF - STOCKTON PORT - USA

Fax:

QUANTITY	DESCRIPTION OF THE GOODS	UNIT PRICE	TOTAL
(b) (4)	NON-GMO SOYBEANS, IN BULK Packed in 2 UNITS	(b) (4)	(b) (4)

- VESSEL NAME : M/V FOUR DIAMOND  
 - SELLER ORDER NO : BYTSON15363  
 - B/L NO : 2 / DTD 03.11.2016  
 - HOLD NO : 3  
 - CUSTOMER LOT NO : LT0050129  
 - FARMER CODE (LOT NO) : HRU-001; HRU-002  
 - HS CODE : 1201.90.00

Description
CIF - STOCKTON PORT - USA

(b) (4)
<u>Total:</u>
<u>Payment:</u>
<u>Subtotal:</u>

\*\*\* Four Million Seventy Four Thousand Two Hundred Eighty USD and Forty Cents. \*\*\*

Total Net Weight:  
Total Gross Weight:  
Contract Number:

(b) (4)  
 BYTSON15183

Beneficiary Bank: YAPI VE KREDİ BANKASI A.Ş.  
Branch: GAZİANTEP BRANCH  
IBAN: TR04 0006 7010 0000 0091 2768 32  
Account No: 91276832  
Swift Code: YAPITRISXX  
Payment: 100% CASH AGAINST GOODS

(b) (6)

Budak Mah. 10031 Nolu Sok. No: 42 Yasem İş Merkezi

Zip Code: 27090 Şehitkamil - GAZİANTEP / TURKEY

T: +90 342 324 44 47 / F: +90 342 323 35 65

www.beyazagro.com / info@beyazagro.com

Shipper:

BEYAZ AGRO ITH. IHR.SAN.VE TIC. A.Ş.  
BUDAK MAH. 10031 NOLU SOK. NO:42  
YASEM IS MERKEZI KAT:10 D:1016-1017  
SEHITKAMIL - GAZIANTEP - TURKEY

TO BE USED WITH CHARTER PARTIES

REFERENCE NO.

SCAC CODE: DPLW

Consignee:

AGROPEX INTERNATIONAL INC.  
413 SOUTH MAIN STREET  
BROADWAY, VA 22815 USA  
PHONE: +1 540-246-3231

Notify address:

HOYT SHEPSTON INC.  
161 STARLITE STREET, UNIT A  
SOUTH SAN FRANCISCO, CA 94080  
TEL: (650) 636-0087  
FAX: (650) 952-5691  
Brenda@hoyt-shepston.com

Vessel

M/V "FOUR DIAMOND"

Port of loading

MERSIN PORT - TURKEY

Port of discharge

STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1 - USA

Shipper's description of goods

Gross Weight

NON GMO SOYBEANS, IN BULK

(b) (4)

- FARMER CODE (LOT NO): HRU-001;HRU-002
- HS CODE: 1201.90.00
- SELLER ORDER NO: BYTSON15363
- COMMERCIAL INVOICE NO (b) (4)
- CUSTOMER LOT NO: LT0050129
- HOLD 3

CLEAN ON BOARD

FREIGHT PAYABLE AS PER CHARTER PARTY

(of which none on deck at Shipper's risk; the Carrier not being responsible for loss or damage howsoever arising)

Freight payable as per  
CHARTER PARTY DATED DD 07.10.2016

FREIGHT ADVANCE  
Received on account of freight

Time used for loading                      days                      hours

SHIPPED at the Port of Loading in apparent good order and condition on board the Vessel for carriage to the Port of Discharge or so near thereto as she may safely get the goods specified above.

Weight, measure, quality, quantity, condition, contents and value unknown.

IT WITNESSETH where of the Master or Agent of the said Vessel has signed the number of Bills of Lading indicated below all of this tenor and date, any one of which being accomplished the others shall be void.

FOR CONDITIONS OF CARRIAGE SEE OVERLEAF

Freight payable <b>FREIGHT PAYABLE AS PER CHARTER PARTY</b>	Place and date of issue <b>MERSIN PORT XX.10.2016</b>
Numbers of original Bs/L <b>3 (THREE)</b>	Signature <b>MR. XXXXX AS MASTER OF "M/V FOUR DIAMOND"</b>

**CERTIFICATE NO: 21527/9925/AGRI/BD**  
**OF, HOLD CLEANLINESS**

**MESSERS.**

**BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.**  
**SEHITKAMIL/GAZIANTEP-TURKEY**

Istanbul, 04.11.2016

**VESSEL'S NAME** : M/V "FOUR DIAMOND"  
**COMMODITY** : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
**QUANTITY** : HOLD 3: (b) (4) AS PER B/L NO 2  
**LOADING PORT** : MERSIN, TURKEY  
**DISCHARGE PORT** : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
**SHIPPER** : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
**CONSIGNEE** : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
**NOTIFY ADDRESS** : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
HOLD INSPECTION	: 30.10.2016 at 11:15 - 12:45 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 - 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**HOLD CLEANS:** All cargo holds of the vessel were checked by our inspectors prior to loading and was found clean, dry, tightness, free from smell, free from alive or dead insects and previous cargo residues and suitable to load and carry the "NON GMO SOYBEANS, IN BULK".

**Last three cargoes:**

- SOYBEANS IN BULK
- MAPGRADE FERTILIZER
- PHOSPHATE ROCK

The above figures reflect the findings at the time and place of loading only and this certificate does not  
from their contractual responsibilities.



**GENERAL SURVEY GÖZETME LTD. ŞTİ.**  
K.Bakkalköy Yolu No: 27 Daire: 6 İçerenköy 34752 Ataşehir / İSTANBUL  
Tel : +90 216 572 22 41 (Pbx) Fax : +90 216 572 22 47  
www.generalsurvey.com.tr

(b) (6)

**CERTIFICATE NO: 21528/9925/AGRI/BD  
OF, QUALITY**

MESSERS.  
BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 3: (b) (4) AS PER B/L NO 2  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

**LOADING SUPERVISION:** Cargo was transported from trucks by means of crane into the vessel holds under our representative's supervision.

**SAMPLING:** According to GAFTA No.124, increment samples were drawn uniformly and systematically, concurrently with loading of the vessel. The samples which were taken according to GAFTA were thoroughly mixed into a bulk sample. The bulk sample was divided into lot samples and final sample was also prepared by mixing lot samples together in proportion to the weight represented by each sample.

**QUALITY:** One set of the composite representative samples was expedited to our GAFTA laboratory in Istanbul/ TURKEY for analysis and our results are follows:

PROTEIN (Nx6.25 DM)	38,92
FOREIGN MATTER	0,53
MOISTURE	11,27
FAT (DM)	21,75
BROKEN & SPLIT	4,86
BUG DAMAGED	none
ALIVE INSECTS & EXCRETA	none

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve the shipper of its actual responsibilities.



GENERAL SURVEY GÖZETİM LTD. STİ

Karaköy Yolu No: 27 Daire: 6 İçerenköy 34752 Ataşehir / İSTANBUL

Tel : +90 216 572 22 41 (Pbx) Fax : +90 216 572 22 47

www.generalsurvey.com.tr

(b) (6)

**CERTIFICATE NO: 21530/9925/AGRI/BD  
OF, HOLD SEALING**

MESSERS.  
BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 3: (b) (4) AS PER B/L NO 2  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

HOLD NO	DESCRIPTION	SEAL NO	SEALED BY
3	HATCH COVER	GSI 017460	GENERAL SURVEY
3	MANHOLE FORWARD	GSI 0012804	GENERAL SURVEY
3	MANHOLE AFT	GSI 0012805	GENERAL SURVEY

The above figures reflect the findings at the time and place of loading only and this certificate does not (b) (6)  
from their contractual responsibilities.

**CERTIFICATE NO:** 21529/9925/AGRI/BD

**OF, WEIGHT**

**MESSERS.**

**BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.**  
**SEHITKAMIL/GAZIANTEP-TURKEY**

Istanbul, 04.11.2016

**VESSEL'S NAME** : M/V "FOUR DIAMOND"  
**COMMODITY** : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE (b) (4)  
**QUANTITY** : HOLD 3: (b) (4) AS PER B/L NO 2  
**LOADING PORT** : MERSIN, TURKEY  
**DISCHARGE PORT** : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
**SHIPPER** : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
**CONSIGNEE** : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
**NOTIFY ADDRESS** : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 - 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**LOADING SUPERVISION:** Cargo was transported from trucks by means of crane into the vessel holds under our representative's supervision.

**WEIGHT:** Weight determination was effected by weighing each truck empty and full over the customs weighbridge during the whole course of loading and following result was found;

(b) (4) NON GMO SOYBEANS, IN BULK

(b) (6)

The above figures reflect the findings at the time and place of loading only and this certificate does not rel. from their contractual responsibilities.



**GENERAL SURVEY GÖZETME LTD. ŞTİ.**  
K.Bakkalköy Yolu No:27 Daire: 6 İçerenköy 34752 Ataşehir / İSTANBUL  
Tel : +90 216 572 22 41 (Pbx) Fax : +90 216 572 22 47  
www.generalsurvey.com.tr



# Beyaz Agro

İTH. İHR. SAN. VE TİC. A. Ş.

Invoice No 24061\_03

## COMMERCIAL INVOICE

Customer Name: AGROPEX INTERNATIONAL INC.

Invoice Date: 3.11.2016

Cstmr. Order No: -

Address: 413 SOUTH MAIN STREET BROADWAY, VA 22815 USA

Attention: (b) (6)

Telephone: +1 540-246-3231

Delivery Terms: CIF-STOCKTON PORT - USA

Fax:

QUANTITY	DESCRIPTION OF THE GOODS	UNIT PRICE	TOTAL
(b) (4)	NON-GMO SOYBEANS IN BULK Packed in 1 UNITS	(b) (4)	(b) (4)

-VESSEL NAME : M/Y FOUR DIAMOND  
 -SELLER ORDER NO : BYISON15363  
 -B/L NO : 3 / DTD:03.11.2016  
 -HOLD NO : 5  
 -CUSTOMER LOT NO : L10050130  
 -FARMER CODE (LOT NO) : HRU-001; HRU-002  
 -HS CODE : 1201.90.00

Description
CIF - STOCKTON PORT - USA

Total:	(b) (4)
Payment:	(b) (4)
Subtotal:	(b) (4)

\*\*\* Two Million Three Hundred Five Thousand Four Hundred Forty Eight USD and Sixty Cent. \*\*\*

Total Net Weight:  
Total Gross Weight:  
Contract Number:

(b) (4)  
 BYISON15183

Beneficiary Bank: YAPI VE KREDİ BANKASI A.Ş.  
Branch: GAZİANTEP BRANCH  
IBAN: TR04 0006 7010 6000 0091 2768 32  
Account No: 93276832  
Swift Code: YAPITR3XXX  
Payment: 100% CASH AGAINST GOODS

(b) (6)

Budak Mah. 10081 Nolu Sok. No: 42 Yasem İş Mrk. Kat: 10 Daire: 1016-1017  
 Zip Code: 27090 Şehitkamil - GAZİANTEP / TURKEY

T: +90 342 324 44 47 / F: +90 342 323 35 65

www.beyazagro.com / info@beyazagro.com

Shipper:

BEYAZ AGRO ITH. IHR.SAN.VE TIC. A.Ş.  
BUDAK MAH. 10031 NOLU SOK. NO:42  
YASEM IS MERKEZI KAT:10 D:1016-1017  
SEHITKAMIL - GAZIANTEP - TURKEY

TO BE USED WITH CHARTER PARTIES

REFERENCE NO.

SCAC CODE: DPLW

Consignee:

AGROPEX INTERNATIONAL INC.  
413 SOUTH MAIN STREET  
BROADWAY, VA 22815 USA  
PHONE: +1 540-246-3231

Notify address:

HOYT SHEPSTON INC.  
161 STARLITE STREET, UNIT A  
SOUTH SAN FRANCISCO, CA 94080  
TEL: (650) 636-0087  
FAX: (650) 952-5691  
Brenda@hoyt-shepston.com

Vessel

M/V "FOUR DIAMOND"

Port of loading

MERSIN PORT - TURKEY

Port of discharge

STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1 - USA

Shipper's description of goods

Gross Weight

NON GMO SOYBEANS, IN BULK

(b) (4)

- FARMER CODE (LOT NO): HRU-001;HRU-002
- HS CODE: 1201.90.00
- SELLER ORDER NO: BYTSON15363
- COMMERCIAL INVOICE NO: (b) (4)
- CUSTOMER LOT NO: LT0050130
- HOLD 5

CLEAN ON BOARD

FREIGHT PAYABLE AS PER CHARTER PARTY

(of which none on deck at Shipper's risk; the Carrier not being responsible for loss or damage howsoever arising)

Freight payable as per  
CHARTER PARTY DATED DD 07.10.2016

FREIGHT ADVANCE  
Received on account of freight

Time used for loading            days            hours

SHIPPED at the Port of Loading in apparent good order and condition on board the Vessel for carriage to the Port of Discharge or so near thereto as she may safely get the goods specified above.

Weight, measure, quality, quantity, condition, contents and value unknown.

IT WITNESSETH that the Master or Agent of the said Vessel has signed the number of Bills of Lading indicated below all of this tenor and date, any one of which being accomplished the others shall be void.

FOR CONDITIONS OF CARRIAGE SEE OVERLEAF

Freight payable <b>FREIGHT PAYABLE AS PER CHARTER PARTY</b>	Place and date of issue <b>MERSIN PORT XX.10.2016</b>
Numbers of original Bs/L <b>3 (THREE)</b>	Signature <b>MR. XXXXX AS MASTER OF "M/V FOUR DIAMOND"</b>

**CERTIFICATE NO: 21532/9925/AGRI/BD**  
**OF, HOLD CLEANLINESS**

**MESSERS.**

**BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.**  
**SEHITKAMIL/GAZIANTEP-TURKEY**

Istanbul, 04.11.2016

**VESSEL'S NAME** : M/V "FOUR DIAMOND"  
**COMMODITY** : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
**QUANTITY** : HOLD 5 (b) (4) AS PER B/L NO 3  
**LOADING PORT** : MERSIN, TURKEY  
**DISCHARGE PORT** : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
**SHIPPER** : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
**CONSIGNEE** : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA.22815 USA  
**NOTIFY ADDRESS** : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
HOLD INSPECTION	: 30.10.2016 at 11:15 - 12:45 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 - 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**HOLD CLEANS:** All cargo holds of the vessel were checked by our inspectors prior to loading and was found clean, dry, tightness, free from smell, free from alive or dead insects and previous cargo residues and suitable to load and carry the "NON GMO SOYBEANS, IN BULK".

**Last three cargoes:**

- SOYBEANS IN BULK
- MAPGRADE FERTILIZER
- PHOSPHATE ROCK

The above figures reflect the findings at the time and place of loading only and this certificate does not release (b) (6) from their contractual responsibilities.



**GENERAL SURVEY GÖZETME LTD. ŞTİ.**  
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www.generalsurvey.com.tr

**CERTIFICATE NO: 21533/9925/AGRI/BD**

**OF, QUALITY**

MESSERS.

BEYAZ AGRO İTH. İHR. SAN. VE TİC. A.Ş.

SEHİTKAMİL/GAZİANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON-GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 5: (b) (4) AS PER B/L NO 3  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO İTH. İHR. SAN. VE TİC. A.Ş. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM İS MERKEZİ KAT:10 D:1016-1017 SEHİTKAMİL -  
GAZİANTEP - TURKEY  
CONSIGNEE : AGRÔPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO İTH. İHR. SAN. VE TİC. A.Ş." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

**LOADING SUPERVISION:** Cargo was transported from trucks by means of crane into the vessel holds under our representative's supervision.

**SAMPLING:** According to GAFTA No.124, increment samples were drawn uniformly and systematically, concurrently with loading of the vessel. The samples which were taken according to GAFTA were thoroughly mixed into a bulk sample. The bulk sample was divided into lot samples and final sample was also prepared by mixing lot samples together in proportion to the weight represented by each sample.

**QUALITY:** One set of the composite representative samples was expedited to our GAFTA laboratory in Istanbul/ TURKEY for analysis and our results are follows:

PROTEIN (N x 6.25 DM)	39,02
FOREIGN MATTER	1,01
MOISTURE	11,21
EAT (DM)	21,82
BROKEN & SPLIT	4,91
BUG DAMAGED	none
ALIVE INSECTS & EXCRETA	none

The above figures reflect the findings at the time of inspection and loading only and this certificate does not relieve the shipper of their original responsibility.  
Bakırköy Yolu No: 27 Daire: 6 İçerenköy 34752 Ataşehir / İSTANBUL  
Tel : +90 216 572 22 41 (Pbx) Fax : +90 216 572 22 47



GENERAL SURVEY GÖZETME LTD. STİ

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(b) (6)



**CERTIFICATE NO: 21534/9925/AGRI/BD**

**OF, WEIGHT**

MESSERS.

BEYAZ AGRO İTH. İHR. SAN. VE TIC. A.S.  
SEHİTKAMİL/GAZİANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON-GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE (b) (4)  
QUANTITY : HOLD 5 (b) (4) AS PER B/L NO 3  
LOADING PORT : MERSİN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO İTH. İHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM İS MERKEZİ KAT:10 D:1016-1017 SEHİTKAMİL –  
GAZİANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO İTH. İHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSİN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 – 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**LOADING SUPERVISION:** Cargo was transported from trucks by means of crane into the vessel holds under our representative's supervision.

**WEIGHT:** Weight determination was effected by weighing each truck empty and full over the customs weighbridge during the whole course of loading and following result was found;

**3907,540 MT NON GMO SOYBEANS, IN BULK,**

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve them from their contractual responsibilities. **GENERAL SURVEY GÖZETME LTD. ŞTİ.**



K.Bakkalköy Yolu No: 27 Daire: 6 İçerenköy 34752 Ataşehir / İSTANBUL  
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www.generalsurvey.com.tr

(b) (6)

INTERNATIONAL

**CERTIFICATE NO: 21535/9925/AGRI/BD**  
**OF, HOLD SEALING**

MESSERS.  
BEYAZ AGRO İTH. İHR. SAN. VE TIC. A.Ş.  
SEHİTKAMİL/GAZİANTEP-TURKEY

Istanbul, 04.11.2016

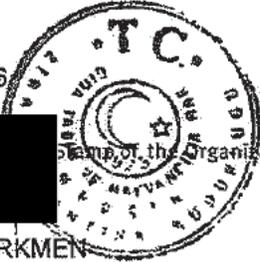
VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON-GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 5: (b) (4) AS PER B/L NO 3  
LOADING PORT : MERSİN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO İTH. İHR. SAN. VE TIC. A.Ş. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM İS MERKEZİ KAT:10 D:1016-1017 SEHİTKAMİL –  
GAZİANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO İTH. İHR. SAN. VE TIC. A.Ş." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSİN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

HOLD NO	DESCRIPTION	SEAL NO	SEALED BY
5	HATCH COVER	GSI 017480	GENERAL SURVEY
5	MANHOLE FORWARD	GSI 0012806	GENERAL SURVEY
5	MANHOLE AFT	GSI 0012801	GENERAL SURVEY

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve the parties concerned from their contractual responsibilities.

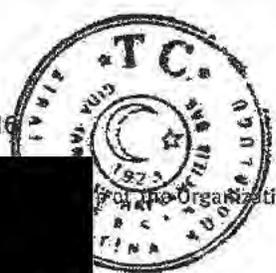
# MINISTRY OF FOOD, AGRICULTURE AND LIVESTOCK

<p>1 - Name and address of exporter</p> <p>BEYAZAGRO ITH.IHR.SAN VE TIC.AS.</p> <p>BUDAK MAH.10031 NOLU SOK.NO:42 YASEM IS.MERK KAT:10 D:1016-1017 SEHITKAMI-GAZIANTEP</p>	<p>2 - PHYTOSANITARY CERTIFICATE</p> <p style="text-align: center;">FOR RE - EXPORT</p> <p style="text-align: center;">NO : EC/TR B 0140369</p> <p style="text-align: right;">ORIGINAL</p>			
<p>3 - Declared name and address of consignee</p> <p>AGROPEX INTERNATIONAL INC.</p> <p>413 SOUTH MAIN STREET BROADWAY, VA 22815 USA PHONE:+1 540-246-3231</p>	<p>4 - Plant Protection Organization of Türkiye to Plant Protection Organization(s) of</p> <p style="text-align: center;">UNITED STATES OF AMERICA</p>			
<p>6 - Declared means of conveyance</p> <p>BY VESSEL</p>	<p>5 - Place of origin</p> <p style="text-align: center;">UKRAINE</p>			
<p>7 - Declared point of entry</p> <p>STOCKTON</p>	<p>TÜRKİYE CUMHURİYETİ</p>  <p>Reg. No REX-13589</p> <p>Prod. Code 12019000</p>			
<p>8 - Distinguishing marks: number and description of packages: name of the product: botanical name of plants</p> <p style="text-align: center;">HRU-00†HRU-00 2</p> <p style="text-align: center;">0 IN BULK</p> <p style="text-align: center;">SOYBEAN <i>Glycine max (L.)</i></p>	<p>9 - Quantity declared</p> <table style="width: 100%; border: none;"> <tr> <td style="text-align: right;">Net Kgs</td> <td style="text-align: center;">(b) (4)</td> <td style="text-align: right;">Gross Kgs</td> </tr> </table>	Net Kgs	(b) (4)	Gross Kgs
Net Kgs	(b) (4)	Gross Kgs		
<p>10 - This is to certify that</p> <ul style="list-style-type: none"> <li>- the plants, plant products or other regulated articles described above were imported into the Republic of Turkey (country of re-export) from.....(country of origin) covered by Phytosanitary Certificate No. ....</li> <li>original <input type="checkbox"/>* certified true copy <input type="checkbox"/>* of which is attached to this certificate;</li> <li>• they are packed <input type="checkbox"/>* repacked <input type="checkbox"/>* in original <input type="checkbox"/>* new <input type="checkbox"/>* containers,</li> <li>• based on the original Phytosanitary Certificate <input type="checkbox"/>* and additional inspection <input type="checkbox"/>*, they are considered to conform with the current phytosanitary requirements of the importing country, and</li> <li>- during storage in the Republic of Turkey (country of re-export), the consignment has not been subjected to the risk of infestation or infection.</li> </ul> <p>(*) Insert tick in appropriate boxes</p>				
<p>11 - Additional declaration</p> <p style="text-align: center;">SEE ATTACHMENT</p>				
<p style="text-align: center;"><b>DESINFESTATION AND/OR DISINFECTION TREATMENT</b></p> <p>12 - Treatment</p> <p>XXXXXXXXNONEXXXXXXXXX</p>	<p>18 - Place of issue</p> <p>Date MERSİN 4 November 2016</p> <p>Name of the <span style="background-color: black; color: white;">(b) (6)</span></p>  <p style="text-align: center;">AHMET ESAT TÜRKMEN INSPECTOR</p>			
<p>13 - Chemical (Active ingredient)</p> <p>XXXXXXXXNONEXXX</p>	<p>14 - Duration and Temperature</p> <p>XXXXXXXXNONEXXX</p>			
<p>15 - Concentration</p> <p>XXXXXXXXNONEXXX</p>	<p>16 - Date</p> <p>XXXXXXXXNONEXXX</p>			
<p>17 - Additional Information</p> <p>XXXXXXXXNONEXXXXXXXXX</p>				

Yasal Dyerim: Bilgi Sağlık Sertifikasını sahtelerarak düzenleyen, başkalarını aldatacak şekilde değiştiren veya kullanılan Mıđlar 6237 sayılı Türk Ceza Kanunu 204. Maddesine göre iki yıldan beş yıla kadar hapis cezası ile cezalandırılır.  
Legal Notice: The person who arrange fraudulent Phytosanitary Certificate or Change of use the Phytosanitary Certificate in such a way to deceive other people shall be punished with penalty of imprisonment from two to five years in accordance with Article 204 of Turkish Penal Code numbered 6237.



# MINISTRY OF FOOD, AGRICULTURE AND LIVESTOCK

<p>1 - Name and address of exporter</p> <p>BEYAZAGRO ITH.IHR.SAN VE TIC.AS.</p> <p>BUDAK MAH.10031 NOLU SOK.NO:42 YASEM'IS MERK KAT:10 D:1016-1017 SEHITKAMIL-GAZIANTEP</p>	<p>2 - PHYTOSANITARY CERTIFICATE</p> <p>FOR RE - EXPORT</p> <p>NO : EC/TR B 0140367</p> <p style="text-align: right;">ORIGINAL</p>				
<p>3 - Declared name and address of consignee</p> <p>AGROPEX INTERNATIONAL INC.</p> <p>413 SOUTH MAIN STREET BROADWAY, VA 22815 USA PHONE:+1 540-246-3231</p>	<p>4 - Plant Protection Organization of Türkiye to Plant Protection Organization(s) of</p> <p style="text-align: center;">UNITED STATES OF AMERICA</p>				
<p>6 - Declared means of conveyance</p> <p>BY VESSEL</p>	<p>5 - Place of origin</p> <p style="text-align: center;">UKRAINE</p>				
<p>7 - Declared point of entry</p> <p>STOCKTON</p>	<p>TÜRKİYE CUMHURİYETİ</p>  <p>Reg. No. REX-13587</p> <p>Prod. Code 12019000</p>				
<p>8 - Distinguishing marks: number and description of packages: name of the product: botanical name of plants</p> <p style="text-align: center;">HRU-001;HRU-00 2</p> <p style="text-align: center;">0 IN BULK</p> <p style="text-align: center;">SOYBEAN <i>Glycine max (L.)</i></p>	<p>9 - Quantity declared</p> <table style="width: 100%; border: none;"> <tr> <td style="text-align: center;">Net Kgs</td> <td style="text-align: center;">Gross Kgs</td> </tr> <tr> <td style="text-align: center;">(b) (4)</td> <td style="text-align: center;">(b) (4)</td> </tr> </table>	Net Kgs	Gross Kgs	(b) (4)	(b) (4)
Net Kgs	Gross Kgs				
(b) (4)	(b) (4)				
<p>10 - This is to certify that</p> <ul style="list-style-type: none"> <li>- the plants, plant products or other regulated articles described above were imported into the Republic of Turkey (country of re-export) from.....(country of origin) covered by Phytosanitary Certificate No. ....</li> <li>original <input type="checkbox"/>* certified true copy <input type="checkbox"/>* of which is attached to this certificate;</li> <li>• they are packed <input type="checkbox"/>* repacked <input type="checkbox"/>* in original <input type="checkbox"/>* new <input type="checkbox"/>* containers,</li> <li>• based on the original Phytosanitary Certificate <input type="checkbox"/>* and additional inspection <input type="checkbox"/>*, they are considered to conform with the current phytosanitary requirements of the importing country, and</li> <li>- during storage in the Republic of Turkey (country of re-export), the consignment has not been subjected to the risk of infestation or infection.</li> </ul> <p>(* Insert tick in appropriate boxes)</p>					
<p>11 - Additional declaration</p> <p style="text-align: center;">SEE ATTACHMENT</p>					
<p style="text-align: center;"><b>DESINFESTATION AND/OR DISINFECTION TREATMENT</b></p> <p>12 - Treatment</p> <p>XXXXXXXXNONEXXXXXXXXX</p> <p>13 - Chemical (Active ingredient)</p> <p>XXXXXXXXNONEXXX</p> <p>14 - Duration and Temperature</p> <p>XXXXXXXXNONEXXXX</p> <p>15 - Concentration</p> <p>XXXXXXXXNONEXXX</p> <p>16 - Date</p> <p>XXXXXXXXNONEXXXX</p> <p>17 - Additional Information</p> <p>XXXXXXXXNONEXXXXXXXXX</p>	<p>18 - Place of issue</p> <p>Date MERSIN</p> <p>4 November 2016</p> <p>Name and of the aut (b) (6)</p> <p style="text-align: center;">ARMET ESAT TURKMEN INSPECTOR</p> 				



# TRANSACTION CERTIFICATE

**KOPIE**

For Kiwa BCS use only. A product declaration for raw material or processed goods with the name of  
KIWA BCS ÖKO-GARANTIE GMBH or its guarantee is exclusively restricted to  
KIWA BCS ÖKO-GARANTIE GMBH certified operators!

The Certification Office of KIWA BCS ÖKO-GARANTIE GMBH, Marientorgraben 3-5, D-90402 Nuremberg, Germany

and the company BEYAZ AGRO ITH. IHR. SAN. VE TİC. A.Ş., BUDAK MAH. 10031 NOLU CAD. NO:42 YASEM IS MERK. K:10 D:1016-1017 ZIP CODE: 27090 SEHITKAMIL / GAZIANTEP - TURKEY

herewith certify that the following products, delivered to AGROPEX INTERNATIONAL INC.413 SOUTH MAIN STREET BROADWAY, VA 22815 USA  
Hakan Gıda Warehouse / MERSIN PORT TURKEY

**ORGANIC SOYBEANS IN BULK, 5.436.900,00 KG TOTAL NET, FARMER CODE (LOT NO): HRU-001, HRU-002/**Customer Lot No:LT0050128,Crop year: 2015,  
**BIO INSPECTA CERTIFICATE NO:HR-023-016,HRU-024-16**

**INVOICE** (b) (4) dtd:03.11.2016  
**B/L No:**1 dtd: 03.11.2016  
**Vessel No:**M/V"FOUR DIAMOND" - Hold#1  
**Delivery Date:** 03.11.2016

was produced according to organic production methods in compliance to USDA-NOP final rule.  
This confirmation is based on the documents presented to KIWA BCS for this file.

Nuremberg, November 15<sup>th</sup>, 2016

(b) (6)

KIWA BCS ÖKO-GARANTIE GmbH  
Marientorgraben 3 - 5  
D-90402 Nürnberg  
T: +49 911 42 43 90  
F: +49 911 49 22 39



The Certification Office of  
KIWA BCS ÖKO-GARANTIE GMBH

## THE SUPPLIER

The delivery of ..... (date) of ..... kg of .....  
according to attached invoice No. .... date ..... corresponds with the  
above stated and certified quality.

.....  
(Place of supplier, date)

.....  
(Stamp and signature)



# TRANSACTION CERTIFICATE

**KOPIE**

For Kiwa BCS use only. A product declaration for raw material or processed goods with the name of  
KIWA BCS ÖKO-GARANTIE GMBH or its guarantee is exclusively restricted to  
KIWA BCS ÖKO-GARANTIE GMBH certified operators!

The Certification Office of KIWA BCS ÖKO-GARANTIE GMBH, Marientorgraben 3-5, D-90402 Nuremberg, Germany

and the company BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.Ş., BUDAK MAH. 10031 NOLU CAD. NO:42 YASEM IS MERK. K:10 D:1016-1017 ZIP CODE: 27090 SEHITKAMIL / GAZIANTEP - TURKEY

herewith certify that the following products, delivered to AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY, VA 22815 USA  
Hakan Gıda Warehouse / MERSIN PORT TURKEY

ORGANIC SOYBEANS IN BULK, 6.905.560,00 KG TOTAL NET, FARMER CODE (LOT NO): HRU-001, HRU-002 / Customer Lot No:LT0050129, Crop year: 2015, BIO INSPECTA CERTIFICATE NO:HR-023-016,HRU-024-16

INVOICE (b) (4) dtd:03.11.2016  
B/L No:2 dtd: 03.11.2016  
Vessel No:M/V"FOUR DIAMOND" Hold#3  
Delivery Date: 03.11.2016

was produced according to organic production methods in compliance to USDA-NOP final rule. This confirmation is based on the documents presented to KIWA BCS for this file.

Nuremberg, November 15<sup>th</sup> 2016

(b) (6)

KIWA BCS ÖKO-GARANTIE GmbH  
Marientorgraben 3 - 5  
D-90402 Nürnberg  
T: +49 911 42 43 90  
F: +49 911 48 22 39



The Certification Office of  
KIWA BCS ÖKO-GARANTIE GMBH

## THE SUPPLIER

The delivery of ..... (date) of ..... kg of .....  
according to attached invoice No. .... date ..... corresponds with the  
above stated and certified quality.

.....  
(Place of supplier, date)

.....  
(Stamp and signature)



# TRANSACTION CERTIFICATE

**KOPIE**

For Kiwa BCS use only. A product declaration for raw material or processed goods with the name of KIWA BCS ÖKO-GARANTIE GMBH or its guarantee is exclusively restricted to KIWA BCS ÖKO-GARANTIE GMBH certified operators!

The Certification Office of KIWA BCS ÖKO-GARANTIE GMBH, Marientorgraben 3-5, D-90402 Nuremberg, Germany

and the company BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.Ş., BUDAK MAH: 10031 NOLU CAD. NO:42 YASEM IS MERK. K:10 D:1016-1017 ZIP CODE: 27090 SEHITKAMIL / GAZIANTEP - TURKEY

herewith certify that the following products, delivered to AGROPEX INTERNATIONAL INC.413 SOUTH MAIN STREET BROADWAY, VA 22815 USA  
Hakan Gıda Warehouse / MERSIN PORT TURKEY

ORGANIC SOYBEANS IN BULK, 3.907.540,00 KG TOTAL-NET, FARMER CODE (LOT NO): HRU-001, HRU-002 / Customer Lot No: LT0050130, Crop year: 2015, BIO INSPECTA CERTIFICATE NO:HR-023-016,HRU-024-16

INVOICE (b) (4) dtd:03.11.2016  
B/L No:3 dtd: 03.11.2016  
Vessel No:M/V"FOUR DIAMOND" Hold#5  
Delivery Date: 03.11.2016

was produced according to organic production methods in compliance to USDA-NOP final rule. This confirmation is based on the documents presented to KIWA BCS for this file.

Nuremberg, November 15<sup>th</sup> 2016

(b) (6)

KIWA BCS ÖKO-GARANTIE GmbH  
Marientorgraben 3 - 5  
D-90402 Nürnberg  
T: +49 911 42 43 90  
F: +49 911 43 22 39



The Certification Office of  
KIWA BCS ÖKO-GARANTIE GMBH

## THE SUPPLIER

The delivery of ..... (date) of ..... kg of .....  
according to attached invoice No. .... date ..... corresponds with the  
above stated and certified quality.

.....  
(Place of supplier, date)

.....  
(Stamp and signature)



**PURCHASE CONTRACT**

**CONTRACT NO:**111/1302390

**DATE:** 15 OCT 2016

**WE HERE WITH CONFIRM HAVING BOUGHT FROM YOU, YOU HAVING SOLD TO US, ON CIF BASIS AS PER THE FOLLOWING TERMS AND CONDITIONS:**

**SELLER:** BEYAZ AGRO  
MAZAYA BUSSINESS AVENUE BB2 TOWER,  
34TH FLOOR

**BUYER:** AGROPEX  
ATTN: (b) (6)

PRODUCT NAME	QUANTITY IN MTS	PACKING	PRICE VALUE(USD)
ORGANIC SOYBEAN	(b) (4)	BULK	(b) (4)
<b>TOTAL VALUE(USD):</b>			(b) (4)

**QUANTITY:** 1 x 20 FT FCL CONTAINING ABOUT 16250 MTS EACH TOTAL QUANTITY ORDERED 16250 MTS (AT SELLERS OPTION +/-5%)  
**MARKING:** SUPPLIER PO#BYTSCN15183  
**SHIPMENT PERIOD:** 15 OCT 2016 TO 15 NOV 2016 (BOTH DATES INCLUDED)  
**PORT/PLACE OF LOADING:** MERSIN SELLERS OPTION  
**PORT/PLACE OF DISCHARGE:** STOCKTON BUYERS OPTION  
**DELIVERY TERMS:** CIF-STOCKTON BUYERS OPTION  
**PAYMENT:** 90 DAYS FROM INVOICE DATE  
**PRODUCTION REMARK:**

DOCUMENTS REQUIRED:	ORIGINALS	COPIES
-NOP CERTIFICATE	1	1
-COMMERCIAL INVOICE	1	1
-PACKING LIST	1	1
-BILL OF LADING	3	3
-CERTIFICATE OF ORIGIN	1	1
-WEIGHT AND QUALITY CERTIFICATE	1	1
-PHYTOSANITARY CERTIFICATE	1	1
-FUMIGATION CERTIFICATE	1	1
-ISF CERTIFICATE	1	1

**OTHER CONDITIONS:**  
-- ANY COSTS AND CONSEQUENCES CAUSED DUE TO LATE PRESENTATION OF DOCUMENTS BY THE SELLER WILL BE TO THE ACCOUNT OF SELLER. IN THAT CASE BUYERS HAVE THE RIGHT TO CLAIM THE DAMAGES TO BE DEDUCTED FROM THE INVOICE AMOUNT



## PURCHASE CONTRACT

CONTRACT NO:111/1302390

DATE: 15 OCT 2016

- SELLER TO ARRANGE ALL EXPORT DOCUMENTS PREPARED STRICTLY AS PER THE INSTRUCTION OF BUYERS AND DRAFTS OF THE DOCUMENTS TO BE FORWARDED TO BUYERS FOR THE APPROVAL. COPIES OF ORIGINAL DOCUMENTS TO BE FORWARDED TO BUYERS WITHIN 7 DAYS FROM THE DATE OF SHIPMENT
- SELLER / SHIPPER SHOULD ENSURE THAT SUFFICIENT QUANTITIES OF MOISTURE ABSORBANTS / DRY BAGS ARE PUT INSIDE THE CONTAINER AT THE TIME STUFFING.
- FREIGHT FORWARDER / HOUSE / BLANK BACK AND CHARTER PARTY BILL OF LADING ARE NOT ACCEPTABLE
- SHIPMENT THROUGH IRANIAN / ISRAELI OR ANY SANCTIONED COUNTRY / FLAG VESSELS NOT ACCEPTABLE
- BUYERS REPRESENTATIVE HAVE THE RIGHT TO INSPECT THE QUALITY OF CARGO PRIOR TO THE SHIPMENT AT SHIPPER'S WAREHOUSE FACILITY
- ALL ORIGINAL DOCUMENTS TO BE DISPATCHED THROUGH SELLER'S BANK TO BUYERS BANK WITHIN 10 DAYS FROM THE DATE OF SHIPMENT. ANY COST INCURRED DUE TO LATE DISPATCH OF ORIGINAL DOCUMENTS TO BE ON SELLER'S ACCOUNT
- ALL OTHER TERMS AND CONDITIONS AS PER THE GAFTA 88 UNLESS OTHERWISE STATED. THIS CONTRACT IS SUBJECT TO THE RULES OF GAFTA 88 AS FULL AS IF THE SAME HAD BEEN EXPRESSLY INSERTED HEREIN, WHETHER OR NOT EITHER OR BOTH PARTIES TO IT ARE MEMBER SO THE ASSOCIATION. IT IS FURTHER UNDERSTOOD THAT BOTH PARTIES POSSESS COMPLETED KNOWLEDGE AND THE PROVISIONS OF THE RELEVANT GAFTA CONTRACT GOVERNING THIS CONTRACT. IF ANY PROVISIONS OF THE CONTRACT ARE INCONSISTENT WITH THE RULES, SUCH PROVISION SHALL PREVAIL. ALL DISPUTES ARISING OUT OF OR IN CONJUNCTION WITH THIS CONTRACT SHALL BE REFERRED TO GAFTA LONDON FOR SETTLEMENT IN ACCORDANCE WITH THE RULES RELATING TO ARBITRATION UNDER GAFTA 125. THIS CONTRACT SHALL BE GOVERNED BY AND CONSTRUED IN ACCORDANCE WITH RELEVANT RULES OF GAFTA 88/125
- ALL BANK CHARGES OUTSIDE BUYERS' COUNTRY INCLUDING REIMBURSEMENT CHARGES TO THE ACCOUNT OF SELLERS
- SELLER TO ARRANGE 14 DAYS CONTAINER DETENTION FREE TIME AT DISCHARGE PORT AND THE SAME TO BE MENTIONED ON THE BILL OF LADING
- ALL CHARGES AT PORT OF LOADING/ORIGIN WOULD BE TO THE ACCOUNT OF SELLER, INCLUDING PORT CONGESTION IF ANY
- THIS CONTRACT IS SUBJECT TO ALL CONTINGENCIES BEYOND HAKAN AGRO DMCC CONTROL, INCLUDING BUT NOT LIMITED TO, ACTS OF GOD, FIRE, FLOOD, DROUGHT, DISEASE, STRIKE, ACCIDENT, LABOUR DIFFICULTY, ACTS OF CARRIERS, WAR CONDITIONS, EMBARGO, INABILITY TO SECURE ESSENTIAL SUPPLIES OR EQUIPMENT, RULES OR LAWS AND ORDERS OF ANY GOVERNMENT
- PLEASE SIGN, STAMP, AND SEAL AND RETURN THIS CONTRACT AS AN ACCEPTANCE OF ABOVE TERMS AS AN ACCEPTANCE OF ABOVE TERMS AND CONDITIONS. HOWEVER, FAILURE TO RETURN THIS CONTRACT BY THE SELLERS IN NO WAY AFFECTS OR ALTERS THE TERMS AND CONDITIONS.
- THIRD PARTY DOCUMENTS ARE ACCEPTABLE EXCEPT INVOICE & DRAFT
- FREIGHT FORWARDER, BLANK BACK, HOUSE BL NOT ACCEPTABLE. SHIPPER TO ARRANGE ONLY LINER FREIGHT PREPAID BILL OF LADING
- SELLER TO ARRANGE 14 DAYS FREE CONTAINER DEMURRAGE AT PORT OF DISCHARGE
- PARTIAL SHIPMENT ALLOWED BUT RESTRICTED TO NOT LESS THAN FIVE FCLs
- TRANSHIPMENT ALLOWED
- CARGO TO BE INSPECTED BY INDEPENDENT SURVEYORS NOMINATED BY THE BUYERS AND APPOINTED BY SELLERS AT THE SELLERS COST
- NO DOCUMENTS EXCEPT COMMERCIAL INVOICE, DRAFT AND SHIPMENT ADVICE TO SHOW THE PRICE AND VALUE OF THE GOODS
- TOLERANCE MENTIONED IN THE CONTRACT ALLOWED FOR BOTH QUANTITY AND VALUE
- SELLERS TO PROVIDE MARINE INSURANCE POLICY OF 110 PCT OF INVOICE VALUE COVERING ALL RISKS INCLUDING WRS AND SRCC

# AGROPEX

## SALES CONTRACT

CONTRACT NO:111/1302394

DATE: 03 FEB 2017

WE HEREBY CONFIRM HAVING SOLD TO YOU, YOU HAVING BOUGHT FROM US, ON EXW BASIS AS PER THE FOLLOWING TERMS AND CONDITIONS:

**SELLER:** AGROPEX  
**ATTN:** (b) (6)

**BUYER:** GLOBAL NATURAL, LLC  
104 BAYVIEW, GRASONVILLE, MD 21638  
**TEL:** 1 410 304 2617

PRODUCT NAME	QUANTITY	PACKING	PRICE VALUE(USD)
ORGANIC SOYBEAN	(b) (4)	BULK	(b) (4)

**TOTAL VALUE(USD):**

(b) (4)

**QUANTITY:** TOTAL QUANTITY ORDERED 16250 MTS(+/- 5% SELLERS OPTION )  
**SHIPMENT PERIOD:** 03 FEB 2017 TO 28 FEB 2017 (BOTH DATES INCLUDED)  
**PORT/PLACE OF LOADING:** MERSIN SELLERS OPTION  
**PORT/PLACE OF DISCHARGE:** STOCKTON BUYERS OPTION  
**DELIVERY TERMS:** EXW-MERSIN SELLERS OPTION  
**PAYMENT:** 14 DAYS FROM INVOICE DATE  
**PRODUCTION REMARK:**  
**FINAL DESTINATION:** UNITED STATES OF AMERICA

### OTHER CONDITIONS:

- TOLERANCE MENTIONED IN THE CONTRACT ALLOWED FOR BOTH QUANTITY AND VALUE

**FOR SELLER:** AGROPEX

**FOR BUYER:** GLOBAL NATURAL, LLC

.....  
AUTHORIZED SIGNATORY

.....  
AUTHORIZED SIGNATORY

# AGROPEX

## SALES INVOICE

SOLD TO GLOBAL NATURAL, LLC  
UNITED STATES OF  
AMERICA

INVOICE NO: (b) (4)  
INVOICE DATE: 2017 02 22  
CONSIGNMENT NO: 2894

QUANTITY	DESCRIPTION OF GOODS	UNITPRICE(USD)	TOTAL(USD)
(b) (4)	ORGANIC SOYBEAN		(b) (4)
Total MT Net	(b) (4)	Subtotal USD	
		Advance Received On Shipment USD	
Total MT Gross		Total USD	

### REMARKS/EXPLANATION:

—from consignment G22117-1

REMITTANCE BANK		CORRESPONDENT BANK:	
BANK:	WELLS FARGO-SAN FRANCISCO, CA	BANK:	null
ACCOUNTNO:	(b) (4)	ACCOUNTNO:	null
SWIFTCODE	WFBIUS6S	SWIFTCODE	null

(AUTHORIZED SIGNATORY)

Cons # 2894  
In # (b) (4)

UNITED STATES WAREHOUSE ACT  
GRAIN WEIGHT CERTIFICATE

TRUCK OUT  
STK 158089

ORIGINAL - NOT NEGOTIABLE  
This certificate is issued by a Weigher licensed under the U.S. Warehouse Act and the regulations thereunder.

WEIGHMASTER Weighed At:

PENNY-NEWMAN  
STOCKTON ELEVATOR  
PENNY-NEWMAN GRAIN CO.  
1805 Harbor St, Stockton, California 95203

AN OFFICIAL WEIGHT CERTIFICATE  
UNDER THE U.S. WAREHOUSE ACT

CARRIER (b) (4)	RELEASE NO. G22117-1	B/L NO.	CONTRACT NO.
ST CA	BUYER GLOBAL NATURAL, LLC		
ST CA	SHIPPER		
TRAILER LIC. NO.	ST CA	DESTINATION AMERICAN RIVER AG-COURTLAND	
COMMODITY TRANSLOAD-ORGANIC SOYBEANS		STORAGE LOCATION 312 U.S. Grade	

(b) (4)

GROSS (lb) 02/22/2017 09:06 AM Auto Wgt. Scale 2 (OUT)  
TARE (lb) 02/22/2017 07:35 AM Auto Wgt. Scale 1 (IN)  
lb - Net Weight

GROSS BY (b) (6)  
Judy Sample Licensed Weigher

TARE BY (b) (6)  
Donald Riel Licensed Weigher

RECEIVED BY (b) (6)  
VENEGAS, ANTHONY

Control #174908



Organic Soybean (Whole)

Guaranteed Analysis

Crude Protein	32%	Min
Moisture	15%	Max
GMO Presence	0.9%	Max

Feeding Directions:

This product is not intended to be fed as a single ingredient. Consult a nutritionist for proper inclusion rate by species in a total mixed ration (TMR).

Storage Recommendations:

Product must be stored in a clean, dry, well ventilated area, free from rodents and insects.

# AGROPEX

## SALES INVOICE

SOLD TO GLOBAL NATURAL, LLC  
UNITED STATES OF  
AMERICA

INVOICE NO: (b) (4)  
INVOICE DATE: 2017 02 22  
CONSIGNMENT NO: 2896

QUANTITY	DESCRIPTION OF GOODS	UNITPRICE(USD)	TOTAL(USD)
(b) (4)	ORGANIC SOYBEAN		(b) (4)
Total MT Net	(b) (4)	Subtotal USD	(b) (4)
Total MT Gross		Advance Received On Shipment USD	(b) (4)
		Total USD	(b) (4)

### REMARKS/EXPLANATION:

—from consignment G22117-2

REMITTANCE BANK		CORRESPONDENT BANK:	
BANK:	WELLS FARGO-SAN FRANCISCO, CA	BANK:	null
ACCOUNTNO:	(b) (4)	ACCOUNTNO:	null
SWIFTCODE	WFBIUS6S	SWIFTCODE	null

(AUTHORIZED SIGNATORY)

Con# 2896  
Inv# (b)(4)

UNITED STATES WAREHOUSE ACT  
GRAIN WEIGHT CERTIFICATE

TRUCK OUT  
STK 158122

ORIGINAL - NOT NEGOTIABLE  
This certificate is issued by a Weigher licensed under the U.S. Warehouse Act and the regulations thereunder.

WEIGHMASTER Weighed At:

**PENNY-NEWMAN  
STOCKTON ELEVATOR  
PENNY-NEWMAN GRAIN CO.**  
1805 Harbor St, Stockton, California 95203

AN OFFICIAL WEIGHT CERTIFICATE  
UNDER THE U.S. WAREHOUSE ACT

CARRIER (b)(4)	RELEASE NO. G22117-2	B/L NO.	CONTRACT NO.
ST CA	BUYER GLOBAL NATURAL, LLC		
ST CA	SHIPPER		
TRAILER LIC. NO.	ST	DESTINATION AMERICAN RIVER AG-COURTLAND	
COMMODITY TRANSLOAD-ORGANIC SOYBEANS		STORAGE LOCATION 312	
		U.S. Grade	

(b)(4)

GROSS (lb) 02/22/2017 12:21 PM Auto Wgt. Scale 2 (OUT)  
TARE (lb) 02/22/2017 11:36 AM Auto Wgt. Scale 1 (IN)

lb - Net Weight

GROSS BY (b)(6)  
Donald Rial Licensed Weigher

TARE BY (b)(6)  
Judy Sample Licensed Weigher

RECEIVED BY (b)(6)  
VENEGAS, ANTHONY

Control#174945



**Organic Soybean (Whole)**

Guaranteed Analysis

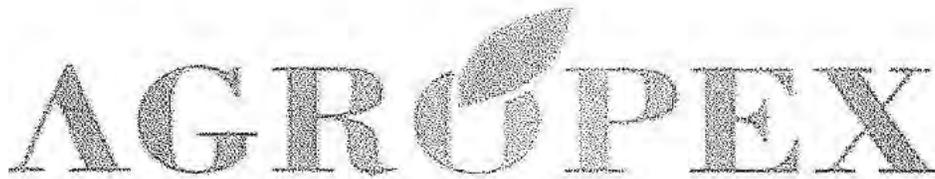
Crude Protein 32% Min  
Moisture 15% Max  
GMO Presence 0.9% Max

Feeding Directions:

This product is not intended to be fed as a single ingredient. Consult a nutritionist for proper inclusion rate by species in a total mixed ration (TMR).

Storage Recommendations:

Product must be stored in a clean, dry, well ventilated area, free from rodents and insects.



### SALES INVOICE

SOLD TO GLOBAL NATURAL, LLC  
UNITED STATES OF AMERICA

INVOICE NO: (b) (4)  
INVOICE DATE: 2017 02 22  
CONSIGNMENT NO: 2898

QUANTITY	DESCRIPTION OF GOODS	UNITPRICE(USD)	TOTAL(USD)
(b) (4)	ORGANIC SOYBEAN		(b) (4)
Total MT Net	(b) (4)	Subtotal USD	(b) (4)
		Advance Received On Shipment USD	(b) (4)
Total MT Gross		Total USD	(b) (4)

**REMARKS/EXPLANATION:**

from consignment: G22117-3

REMITTANCE BANK		CORRESPONDENT BANK:	
BANK:	WELLS FARGO-SAN FRANCISCO, CA	BANK:	null
ACCOUNTNO:	(b) (4)	ACCOUNTNO:	null
SWIFTCODE	WFBIUS6S	SWIFTCODE	null

(AUTHORIZED SIGNATORY)

Con # 2898  
 Inv # (b) (4)

UNITED STATES WAREHOUSE ACT  
 GRAIN WEIGHT CERTIFICATE

TRUCK OUT  
 STK 158123

ORIGINAL - NOT NEGOTIABLE  
 This certificate is issued by a Weigher licensed under the U.S. Warehouse Act and the regulations thereunder.

WEIGHMASTER Weighed At:

**PENNY-NEWMAN**  
**STOCKTON ELEVATOR**  
**PENNY-NEWMAN GRAIN CO.**  
 1805 Harbor St, Stockton, California 95203

AN OFFICIAL WEIGHT CERTIFICATE  
 UNDER THE U.S. WAREHOUSE ACT

CARRIER (b) (4)	RELEASE NO. G22117-3	S/L NO.	CONTRACT NO.
ST CA	BUYER GLOBAL NATURAL, LLC		
ST CAN	SHEPPER		
TRAILER LIC. NO.	ST	DESTINATION AMERICAN RIVER AG-COURTLAND	
COMMODITY TRANSLOAD-ORGANIC SOYBEANS		STORAGE LOCATION 312	
		U.S. Grade	

(b) (4)

GROSS (lb) 02/22/2017 12:46 PM Auto Wgt. Scale 2 (OUT)  
 TARE (lb) 02/22/2017 12:07 PM Auto Wgt. Scale 1 (IN)

lb - Net Weight

GROSS BY (b) (6)  
 Judy Sample Licensed Weigher

TARE BY (b) (6)  
 Judy Sample Licensed Weigher

RECEIVED BY (b) (6)  
 ZARAGOZA ARROYO, ERIK

Control#174947



**Organic Soybean (Whole)**

Guaranteed Analysis

Crude Protein 32% Min  
 Moisture 15% Max  
 GMO Presence 0.9% Max

Feeding Directions:

This product is not intended to be fed as a single ingredient. Consult a nutritionist for proper inclusion rate by species in a total mixed ration (TMR).

Storage Recommendations:

Product must be stored in a clean, dry, well ventilated area, free from rodents and insects.

# AGROPEX

## SALES INVOICE

SOLD TO GLOBAL NATURAL, LLC  
UNITED STATES OF  
AMERICA

INVOICE NO: (b) (4)  
INVOICE DATE: 2017 02 22  
CONSIGNMENT NO: 2900

QUANTITY	DESCRIPTION OF GOODS	UNITPRICE(USD)	TOTAL(USD)
(b) (4)	ORGANIC SOYBEAN		(b) (4)
Total MT Net: (b) (4)		Subtotal USD	
		Advance Received On Shipment USD	
Total MT Gross:		Total USD	

### REMARKS/EXPLANATION:

--from consignment G22117-4

REMITTANCE BANK		CORRESPONDENT BANK:	
BANK:	WELLS FARGO-SAN FRANCISCO, CA	BANK:	null
ACCOUNTNO:	(b) (4)	ACCOUNTNO:	null
SWIFTCODE	WFBIUS6S	SWIFTCODE	null

(AUTHORIZED SIGNATORY)

Con# 2900  
 Inv# (b) (4)

UNITED STATES WAREHOUSE ACT  
 GRAIN WEIGHT CERTIFICATE

TRUCK OUT  
 STK 158091

ORIGINAL - NOT NEGOTIABLE  
 This certificate is issued by a Weigher licensed under the U.S. Warehouse Act and the regulations thereunder.

WEIGHMASTER Weighed At:

**PENNY-NEWMAN  
 STOCKTON ELEVATOR  
 PENNY-NEWMAN GRAIN CO.  
 1805 Harbor St, Stockton, California 95203**

AN OFFICIAL WEIGHT CERTIFICATE  
 UNDER THE U.S. WAREHOUSE ACT

CARRIER (b) (4)	RELEASE NO. G22117-4	B/L NO.	CONTRACT NO.
ST CA	BUYER GLOBAL NATURAL, LLC		
ST CAN	SHIPPER		
TRAILER LIC. NO.	ST	DESTINATION AMERICAN RIVER AG-COURTLAND	
COMMODITY TRANSLOAD-ORGANIC SOYBEANS		STORAGE LOCATION 312	
		U.S. Grade	

(b) (4)

GROSS (lb) 02/22/2017 09:28 AM Auto Wgt. Scale 3 (TOP)  
 TARE (lb) 02/22/2017 08:43 AM Auto Wgt. Scale 1 (IN)

lb - Net Weight

GROSS BY (b) (6)  
 Judy Sample Licensed Weigher

TARE BY (b) (6)  
 Judy Sample Licensed Weigher

RECEIVED BY (b) (6)  
 ZARAGOZA ARROYO, ERIK

Control#174912



**Organic Soybean (Whole)**

Guaranteed Analysis

Crude Protein 32% Min  
 Moisture 15% Max  
 GMO Presence 0.9% Max

Feeding Directions:

This product is not intended to be fed as a single ingredient. Consult a nutritionist for proper inclusion rate by species in a total mixed ration (TMR).

Storage Recommendations:

Product must be stored in a clean, dry, well ventilated area, free from rodents and insects.

Shipper:

BEYAZ AGRO ITH. IHR.SAN.VE TIC. A.Ş.  
 BUDAK MAH. 10031 NOLU SOK. NO:42  
 YASEM IS MERKEZI KAT:10 D:1016-1017  
 SEHITKAMIL - GAZIANTEP - TURKEY

**BILL OF LADING B/L No. 1**

TO BE USED WITH CHARTER PARTIES

REFERENCE NO.

SCAC CODE: DPLW

Consignee:

AGROPEX INTERNATIONAL INC.  
 413 SOUTH MAIN STREET  
 BROADWAY, VA 22815 USA  
 PHONE: +1 540-246-3231

Notify address:

HOYT SHEPSTON INC.  
 161 STARLITE STREET, UNIT A  
 SOUTH SAN FRANCISCO, CA 94080  
 TEL: (650) 636-0087  
 FAX: (650) 952-5691  
 Brenda@hoyt-shepston.com

**SECOND ORIGINAL**

Vessel

M/V "FOUR DIAMOND"

Port of loading

MERSIN PORT - TURKEY

Port of discharge

STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1 - USA

Shipper's description of goods

Gross Weight

NON GMO SOYBEANS, IN BULK

(b) (4)

- FARMER CODE (LOT NO): HRU-001;HRU-002
- HS CODE: 1201.90.00
- SELLER ORDER NO: BYTSON15363
- COMMERCIAL INVOICE NO: (b) (4)
- CUSTOMER LOT NO: LT0050128
- HOLD 1

**CLEAN ON BOARD**

**FREIGHT PAYABLE AS PER CHARTER PARTY**

(of which none on deck at Shipper's risk; the Carrier not being responsible for loss or damage howsoever arising)

Freight payable as per

CHARTER PARTY DATED DD 07.10.2016

FREIGHT ADVANCE

Received on account of freight

Time used for loading

days

hours

SHIPPED at the Port of Loading in apparent good order and condition on board the Vessel for carriage to the Port of Discharge or so near thereto as she may safely get the goods specified above.

Weight, measure, quality, quantity, condition, contents and value unknown.

IT WITNESS where of the Master or Agent of the said Vessel has signed the number of Bills of Lading indicated below all of this tenor and date, any one of which being accomplished the others shall be void.

FOR CONDITIONS OF CARRIAGE SEE OVERLEAF

Freight payable <b>FREIGHT PAYABLE AS PER CHARTER PARTY</b>	Place and date of issue <b>MERSIN PORT 03.11.2016</b>
Numbers of original Bs/L <b>3 (THREE)</b>	Signature <b>TEM-MAR SHIPPING AGENCY, ON BEHALF OF MASTER OF "M/V FOUR DIAMOND"</b>

**TEM-MAR**  
 Gemi Aş. San.ve Tic.Ltd.Şti.  
 Tel:+90(324) 238 41 35  
 Camışenli Köyü, Nilüfer Mahallesi, No:106  
 Kat:3/25  
 Mersin  
 İRAY V.D 837 007 0564  
 F-64400011 Tic Sic 17225

**CERTIFICATE NO: 21522/9925/AGRI/BD  
OF, HOLD CLEANLINESS**

MESSERS.  
BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 1: (b) (4) AS PER B/L NO 1  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
HOLD INSPECTION	: 30.10.2016 at 11:15 - 12:45 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 - 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**HOLD CLEANS:** All cargo holds of the vessel were checked by our inspectors prior to loading and was found clean, dry, tightness, free from smell, free from alive or dead insects and previous cargo residues and suitable to load and carry the "NON GMO SOYBEANS, IN BULK".

**Last three cargoes:**

- SOYBEANS IN BULK
- MAPGRADE FERTILIZER
- PHOSPHATE ROCK

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve the parties concerned from their contractual responsibilities.

(b) (6)

**CERTIFICATE NO: 21523/9925/AGRI/BD  
OF, QUALITY**

MESSERS.  
BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 1: (b) (4) AS PER B/L NO 1  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL –  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

**LOADING SUPERVISION:** Cargo was transported from trucks by means of crane into the vessel holds under our representative's supervision.

**SAMPLING:** According to GAFTA No.124, increment samples were drawn uniformly and systematically, concurrently with loading of the vessel. The samples which were taken according to GAFTA were thoroughly mixed into a bulk sample. The bulk sample was divided into lot samples and final sample was also prepared by mixing lot samples together in proportion to the weight represented by each sample.

**QUALITY:** One set of the composite representative samples was expedited to our GAFTA laboratory in Istanbul/ TURKEY for analysis and our results are follows:

ANALYSIS	HOLD 1
PROTEIN (Nx6.25 DM)	38,42
FOREIGN MATTER	0,49
MOISTURE	11,43
FAT (DM)	21,85
BROKEN & SPLIT	4,25
BUG DAMAGED	none
ALIVE INSECTS & EXCRETA	none

(b) (6)

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve the shipper from their contractual responsibilities.  
K. Barlıköy Yolu No: 27 Daire: 6 İçerfenköy 34752 Ataşehir / İSTANBUL  
Tel : +90 216 572 22 41 (Pbx) Fax : +90 216 572 22 47  
www.generalsurvey.com.tr

**CERTIFICATE NO: 21525/9925/AGRI/BD  
OF, HOLD SEALING**

MESSERS.  
BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE (b) (4)  
QUANTITY : HOLD 1: (b) (4) AS PER B/L NO 1  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

HOLD NO	DESCRIPTION	SEAL NO	SEALED BY
1	HATCH COVER	GSI 017440	GENERAL SURVEY
1	MANHOLE FORWARD	GSI 0012802	GENERAL SURVEY
1	MANHOLE AFT	GSI 0012803	GENERAL SURVEY

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve the parties concerned from their contractual responsibilities.

(b) (6)

**CERTIFICATE NO: 21524/9925/AGRI/BD**

**OF, WEIGHT**

MESSERS.

BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.

SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE (b) (4)  
QUANTITY : HOLD 1: (b) (4) AS PER B/L NO 1  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED : 27.10.2016 at 00:06 hrs.  
VESSEL BERTHED : 30.10.2016 at 15:25 hrs.  
INITIAL DRAFT SURVEY : 30.10.2016 at 15:30 - 17:00 hrs.  
LOADING COMMENCED : 30.10.2016 at 17:06 hrs.  
LOADING COMPLETED : 03.11.2016 at 11:50 hrs.  
FINAL DRAFT SURVEY : 03.11.2016 at 11:50 - 13:15 hrs.

**LOADING SUPERVISION:** Cargo was transported from trucks by means of crane into the vessel holds under our representative's supervision.

**WEIGHT:** Weight determination was effected by weighing each truck empty and full over the customs weighbridge during the whole course of loading and following result was found;

**5436,900 MT NON GMO SOYBEANS, IN BULK**

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve them from their contractual responsibilities.

(b) (6)

**BILL OF LADING B/L No. 2**

TO BE USED WITH CHARTER PARTIES

REFERENCE NO.

SCAC CODE: DPLW

Shipper:

BEYAZ AGRO ITH. IHR.SAN.VE TIC. A.Ş.  
 BUDAK MAH. 10031 NOLU SOK. NO:42  
 YASEM IS MERKEZI KAT:10 D:1016-1017  
 SEHITKAMIL - GAZIANTEP - TURKEY

Consignee:

AGROPEX INTERNATIONAL INC.  
 413 SOUTH MAIN STREET  
 BROADWAY, VA 22815 USA  
 PHONE: +1 540-246-3231

Notify address:

HOYT SHEPSTON INC.  
 161 STARLITE STREET, UNIT A  
 SOUTH SAN FRANCISCO, CA 94080  
 TEL: (650) 636-0087  
 FAX: (650) 952-5691  
 Brenda@hoyt-shepston.com

**SECOND ORIGINAL**

Vessel

M/V "FOUR DIAMOND"

Port of loading

MERSIN PORT - TURKEY

Port of discharge

STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1 - USA

Shipper's description of goods

NON GMO SOYBEANS, IN BULK

Gross Weight

(b) (4)

- FARMER CODE (LOT NO): HRU-001;HRU-002
- HS CODE: 1201.90.00
- SELLER ORDER NO: BYTSON15363
- COMMERCIAL INVOICE NO: (b) (4)
- CUSTOMER LOT NO: LT0050129
- HOLD 3

**CLEAN ON BOARD  
 FREIGHT PAYABLE AS PER CHARTER PARTY**

(of which none on deck at Shipper's risk; the Carrier not being responsible for loss or damage howsoever arising)

Freight payable as per  
 CHARTER PARTY DATED DD 07.10.2016

FREIGHT ADVANCE  
 Received on account of freight

Time used for loading                      days                      hours

SHIPPED at the Port of Loading in apparent good order and condition on board the Vessel for carriage to the Port of Discharge or so near thereto as she may safely get the goods specified above.  
 Weight, measure, quality, quantity, condition, contents and value unknown.  
 IT WITNESS where of the Master or Agent of the said Vessel has signed the number of Bills of Lading indicated below all of this tenor and date, any one of which being accomplished the others shall be void.  
 FOR CONDITIONS OF CARRIAGE SEE OVERLEAF

Freight payable <b>FREIGHT PAYABLE AS PER CHARTER PARTY</b>	Place and date of issue <b>MERSIN PORT 03.11.2016</b>
Numbers of original Bs/L <b>3 (THREE)</b>	Signature <b>TEM-MAR SHIPPING AGENCY, ON BEHALF OF MASTER OF "M/V FOUR DIAMOND"</b>

**TEM-MAR**  
 Geml Acenti (b) (6) San.ve Tic.Ltd.Sti.  
 Tel:+90(324) 238 41 35  
 Comiseri M... Nal Goksu lgh No 106  
 Kat:3/25 M... Y.V.D 837 007 0544

**CERTIFICATE NO: 21527/9925/AGRI/BD**  
**OF, HOLD CLEANLINESS**

MESSERS,  
BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 3: (b) (4) AS PER B/L NO 2  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
HOLD INSPECTION	: 30.10.2016 at 11:15 – 12:45 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 – 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**HOLD CLEANS:** All cargo holds of the vessel were checked by our inspectors prior to loading and was found clean, dry, tightness, free from smell, free from alive or dead insects and previous cargo residues and suitable to load and carry the "NON GMO SOYBEANS, IN BULK".

**Last three cargoes:**

- SOYBEANS IN BULK
- MAPGRADE FERTILIZER
- PHOSPHATE ROCK

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve the parties concerned from their contractual responsibilities.

**CERTIFICATE NO: 21529/9925/AGRI/BD**

**OF, WEIGHT**

MESSERS.

BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.

SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 3: (b) (4) AS PER B/L NO 2  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL –  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 – 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**LOADING SUPERVISION:** Cargo was transported from trucks by means of crane into the vessel holds under our representative's supervision.

**WEIGHT:** Weight determination was effected by weighing each truck empty and full over the customs weighbridge during the whole course of loading and following result was found;

(b) (4) NON GMO SOYBEANS, IN BULK

(b) (6)

The above figures reflect the findings at the time and place of loading only and this certificate does not release the shipper from their contractual responsibilities.



**GENERAL SURVEY GÖZETME LTD. ŞTİ.**  
K.Bakkalköy Yolu No: 27 Daire: 6 İçerenköy 34752 Ataşehir / İSTANBUL  
Tel : +90 216 572 22 41 (Pbx) Fax : +90 216 572 22 47  
www.generalsurvey.com.tr

**CERTIFICATE NO: 21528/9925/AGRI/BD  
OF, QUALITY**

MESSERS.  
BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 3: (b) (4) AS PER B/L NO 2  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL –  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

**LOADING SUPERVISION:** Cargo was transported from trucks by means of crane into the vessel holds under our representative's supervision.

**SAMPLING:** According to GAFTA No.124, increment samples were drawn uniformly and systematically, concurrently with loading of the vessel. The samples which were taken according to GAFTA were thoroughly mixed into a bulk sample. The bulk sample was divided into lot samples and final sample was also prepared by mixing lot samples together in proportion to the weight represented by each sample.

**QUALITY:** One set of the composite representative samples was expedited to our GAFTA laboratory in Istanbul/ TURKEY for analysis and our results are follows:

ANALYSIS	HOLD 3
PROTEIN (Nx6.25 DM)	38,92
FOREIGN MATTER	0,53
MOISTURE	11,27
FAT (DM)	21,75
BROKEN & SPLIT	4,86
BUG DAMAGED	none
ALIVE INSECTS & EXCRETA	none

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve the shipper from their contractual responsibilities.  
 **GENERAL SURVEY GÖZETME LTD. STİ.**  
K. Bahçeköy Yolu No: 27 Daire: 6 İçerenköy 34752 Ataşehir / İSTANBUL  
Tel : +90 216 572 22 41 (Pbx) Fax : +90 216 572 22 47  
www.generalsurvey.com.tr

(b) (6)

**CERTIFICATE NO: 21530/9925/AGRI/BD  
OF, HOLD SEALING**

MESSERS.

BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 3: (b) (4) AS PER B/L NO 2  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL –  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

HOLD NO	DESCRIPTION	SEAL NO	SEALED BY
3	HATCH COVER	GSI 017460	GENERAL SURVEY
3	MANHOLE FORWARD	GSI 0012804	GENERAL SURVEY
3	MANHOLE AFT	GSI 0012805	GENERAL SURVEY

The above figures reflect the findings at the time and place of loading only and this certificate does not from their contractual responsibilities.

(b) (6)

**BILL OF LADING B/L No. 3**

TO BE USED WITH CHARTER PARTIES

REFERENCE NO.

SCAC CODE: DPLW

Shipper:

BEYAZ AGRO ITH. IHR.SAN.VE TIC. A.Ş.  
 BUDAK MAH. 10031 NOLU SOK. NO:42  
 YASEM IS MERKEZI KAT:10 D:1016-1017  
 SEHITKAMIL - GAZIANTEP - TURKEY

Consignee:

AGROPEX INTERNATIONAL INC.  
 413 SOUTH MAIN STREET  
 BROADWAY, VA 22815 USA  
 PHONE: +1 540-246-3231

**SECOND ORIGINAL**

Notify address:

HOYT SHEPSTON INC.  
 161 STARLITE STREET, UNIT A  
 SOUTH SAN FRANCISCO, CA 94080  
 TEL: (650) 636-0087  
 FAX: (650) 952-5691  
 Brenda@hoyt-shepston.com

Vessel

M/V "FOUR DIAMOND"

Port of loading

MERSIN PORT - TURKEY

Port of discharge

STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1 - USA

Shipper's description of goods

Gross Weight

NON GMO SOYBEANS, IN BULK

(b) (4)

- FARMER CODE (LOT NO): HRU-001;HRU-002
- HS CODE: 1201.90.00
- SELLER ORDER NO: BYTSON15363
- COMMERCIAL INVOICE NO: (b) (4)
- CUSTOMER LOT NO: LT0050130
- HOLD 5

**CLEAN ON BOARD  
 FREIGHT PAYABLE AS PER CHARTER PARTY**

(of which none on deck at Shipper's risk; the Carrier not being responsible for loss or damage howsoever arising)

Freight payable as per  
 CHARTER PARTY DATED DD 07.10.2016

FREIGHT ADVANCE  
 Received on account of freight

Time used for loading                      days                      hours

SHIPPED at the Port of Loading in apparent good order and condition on board the Vessel for carriage to the Port of Discharge or so near thereto as she may safely get the goods specified above.  
 Weight, measure, quality, quantity, condition, contents and value unknown.  
 IT WITNESS where of the Master or Agent of the said Vessel has signed the number of Bills of Lading indicated below all of this tenor and date, any one of which being accomplished the others shall be void.  
 FOR CONDITIONS OF CARRIAGE SEE OVERLEAF

Freight payable <b>FREIGHT PAYABLE AS PER CHARTER PARTY</b>	Place and date of issue <b>MERSIN PORT 03.11.2016</b>
Numbers of original Bs/L <b>3 (THREE)</b>	Signature <b>TEM-MAR SHIPPING AGENCY, ON BEHALF OF MASTER OF "M/V FOUR DIAMOND"</b>

**TEM-MAR**  
 Gemi Acemi San.ve Tic.Ltd.Sti.  
 Tel:+90(324) 837 007 0564  
 Comiserif Mh. Y.V.D 837 007 0564  
 Kat:3/25 ME 6400011 Tic.Sic.17225

(b) (6)

**CERTIFICATE NO: 21533/9925/AGRI/BD  
OF, QUALITY**

MESSERS.

BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.

SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 5 (b) (4) AS PER B/L NO 3  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

**LOADING SUPERVISION:** Cargo was transported from trucks by means of crane into the vessel holds under our representative's supervision.

**SAMPLING:** According to GAFTA No.124, increment samples were drawn uniformly and systematically, concurrently with loading of the vessel. The samples which were taken according to GAFTA were thoroughly mixed into a bulk sample. The bulk sample was divided into lot samples and final sample was also prepared by mixing lot samples together in proportion to the weight represented by each sample.

**QUALITY:** One set of the composite representative samples was expedited to our GAFTA laboratory in Istanbul/ TURKEY for analysis and our results are follows:

ANALYSIS	HOLD 5
PROTEIN (Nx6.25 DM)	39,02
FOREIGN MATTER	1,01
MOISTURE	11,21
FAT (DM)	21,82
BROKEN & SPLIT	4,91
BUG DAMAGED	none
ALIVE INSECTS & EXCRETA	none

(b) (6)

**CERTIFICATE NO: 21532/9925/AGRI/BD  
OF, HOLD CLEANLINESS**

MESSERS.

BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 5 (b) (4) AS PER B/L NO 3  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL –  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
HOLD INSPECTION	: 30.10.2016 at 11:15 – 12:45 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 – 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**HOLD CLEANS:** All cargo holds of the vessel were checked by our inspectors prior to loading and was found clean, dry, tightness, free from smell, free from alive or dead insects and previous cargo residues and suitable to load and carry the "NON GMO SOYBEANS, IN BULK".

**Last three cargoes:**

- SOYBEANS IN BULK
- MAPGRADE FERTILIZER
- PHOSPHATE ROCK

The above figures reflect the findings at the time and place of loading only and this certificate does not rel from their contractual responsibilities.

(b) (6)

**CERTIFICATE NO: 21534/9925/AGRI/BD**

**OF, WEIGHT**

MESSERS.

BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.

SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 5 (b) (4) AS PER B/L NO 3  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

VESSEL ARRIVED	: 27.10.2016 at 00:06 hrs.
VESSEL BERTHED	: 30.10.2016 at 15:25 hrs.
INITIAL DRAFT SURVEY	: 30.10.2016 at 15:30 - 17:00 hrs.
LOADING COMMENCED	: 30.10.2016 at 17:06 hrs.
LOADING COMPLETED	: 03.11.2016 at 11:50 hrs.
FINAL DRAFT SURVEY	: 03.11.2016 at 11:50 - 13:15 hrs.

**LOADING SUPERVISION:** Cargo was transported from trucks by means of crane into the vessel holds under our representative's supervision.

**WEIGHT:** Weight determination was effected by weighing each truck empty and full over the customs weighbridge during the whole course of loading and following result was found;

(b) (4)

NON GMO SOYBEANS, IN BULK,

(b) (6)

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve the from their contractual responsibilities.

**GENERAL SURVEY GÖZETME LTD. ŞTİ.**

K.Bakkalköy Yolu No: 27 Daire: 6 İçerenköy 34752 Ataşehir / İSTANBUL

Tel : +90 216 572 22 41 (Pbx) Fax : +90 216 572 22 47

www.generalsurvey.com.tr

**CERTIFICATE NO: 21535/9925/AGRI/BD  
OF, HOLD SEALING**

MESSERS,  
BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S.  
SEHITKAMIL/GAZIANTEP-TURKEY

Istanbul, 04.11.2016

VESSEL'S NAME : M/V "FOUR DIAMOND"  
COMMODITY : NON GMO SOYBEANS, IN BULK  
:HS CODE 1201.90.00  
:SELLER ORDER NO: BYTSON15363  
:COMMERCIAL INVOICE: (b) (4)  
QUANTITY : HOLD 5 (b) (4) AS PER B/L NO 3  
LOADING PORT : MERSIN, TURKEY  
DISCHARGE PORT : STOCKTON, PENNY NEWMAN GRAIN TERMINAL, BERTH#1- USA  
SHIPPER : BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S. BUDAK MAH. 10031 NOLU SOK.  
NO:42 YASEM IS MERKEZI KAT:10 D:1016-1017 SEHITKAMIL -  
GAZIANTEP - TURKEY  
CONSIGNEE : AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY,  
VA 22815 USA  
NOTIFY ADDRESS : HOYT SHEPSTON INC. 161 STARLITE STREET, UNIT A SOUTH SAN  
FRANSISCO, CA 94080

This is to certify that, upon instructions received from Messrs. "BEYAZ AGRO ITH. IHR. SAN. VE TIC. A.S." our inspectors have supervised the cargo "NON GMO SOYBEANS, IN BULK" that was loaded on to MV "FOUR DIAMOND" at MERSIN PORT, TURKEY from October 30<sup>th</sup> to November 03<sup>th</sup> 2016 and performed the following operations on the above mentioned consignment.

HOLD NO	DESCRIPTION	SEAL NO	SEALED BY
5	HATCH COVER	GSI 017480	GENERAL SURVEY
5	MANHOLE FORWARD	GSI 0012806	GENERAL SURVEY
5	MANHOLE AFT	GSI 0012801	GENERAL SURVEY

The above figures reflect the findings at the time and place of loading only and this certificate does not relieve the parties concerned from their contractual responsibilities.

(b) (6)



REPUBLIC OF TURKEY

MINISTRY OF FOOD,  
AGRICULTURE AND LIVESTOCK

ATTACHMENT SHEET FOR  
PHYTOSANITARY CERTIFICATE OR  
PHYTOSANITARY CERTIFICATE  
FOR RE-EXPORT

TÜRKİYE CUMHURİYETİ



PHYTOSANITARY CERTIFICATE OR  
RE-EXPORT PHYTOSANITARY CERTIFICATE

NO

EC/TRA 0140369

DATE

04.11.2016 00:00:00

TO: THE PLANT PROTECTION ORGANIZATION(S) OF

UNITED STATES OF AMERICA

ADDITIONAL OFFICIAL PHYTOSANITARY INFORMATION

- Ek Deklarasyon (Additional Declaration) (Box 11)  
- COMM. INV: (b) (4) - FARMER CODE (LOT NO): HRU-001; HRU-002, - HOLD#1, -CUSTOMER  
LOT NO:LT0050128, - SHIPMENT WAS INSPECTED AND FOUND TO  
BE FREE OF KHAPRA BEETLE (TROGODERMA GRANARIUM)  
This phytosanitary certificate is issued instead of the certificate numbered 0140061 and dated 27/10/2016.

PLACE OF ISSUE

(b) (6)

DATE ISSUED

04.11.2016 00:00:00

NAME AND

CER

STAMP OF ORGANIZATION

AHMET ESAT TURKMEN  
INSPECTOR





REPUBLIC OF TURKEY  MINISTRY OF FOOD, AGRICULTURE AND LIVESTOCK  ATTACHMENT SHEET FOR PHYTOSANITARY CERTIFICATE OR PHYTOSANITARY CERTIFICATE FOR RE-EXPORT	TÜRKİYE CUMHURİYETİ   T.C. GIDA TARIM VE HAYVANCILIK BAKANLIĞI	PHYTOSANITARY CERTIFICATE OR RE-EXPORT PHYTOSANITARY CERTIFICATE	
		NO	EC/TR A 0140368
		DATE	04.11.2016 00:00:00

TO: THE PLANT PROTECTION ORGANIZATION(S) OF  
 UNITED STATES OF AMERICA

**ADDITIONAL OFFICIAL PHYTOSANITARY INFORMATION**

- COMM. INV. (b) (4) Ek Deklarasyon (Additional Declaration) (Box 11)  
 - FARMER CODE (LOT NO): HRU-001; HRU-002 , - HOLD#3, -CUSTOMER LOT NO:LT0050129, - SHIPMENT WAS INSPECTED AND FOUND TO BE FREE OF KHAPRA BEETLE (TROGODERMA GRANARIUM)  
 This phytosanitary certificate is issued instead of the certificate numbered 0140061 and dated 27/10/2016.

PLACE OF ISSUE	DATE ISSUED
MERSİN	04.11.2016 00:00:00
NAME AND SIGNATURE OF OFFICER	STAMP OF ORGANIZATION
(b) (6) AHMET LEAL YORUMEN INSPECTOR	

# MINISTRY OF FOOD, AGRICULTURE AND LIVESTOCK

<b>1 - Name and address of exporter</b> BEYAZAGRO ITH.IHR.SAN VE TIC.AS.  BUDAK MAH.10031 NOLU SOK.NO:42 YASEM IS MERK KAT:10 D:1016-1017 SEHITKAMIL-GAZIANTEP	<b>2 - PHYTOSANITARY CERTIFICATE</b>  <b>FOR RE - EXPORT</b> <b>NO : EC/TR B 0140367</b>  <div style="text-align: right; color: red; font-weight: bold;">ORIGINAL</div>
<b>3 - Declared name and address of consignee</b>  AGROPEX INTERNATIONAL INC.  413 SOUTH MAIN STREET BROADWAY, VA 22815 USA PHONE:+1 540-246-3231	<b>4 - Plant Protection Organization of Türkiye to Plant Protection Organization(s) of</b>  UNITED STATES OF AMERICA
<b>6 - Declared means of conveyance</b> BY VESSEL	<b>5 - Place of origin</b> UKRAINE
<b>7 - Declared point of entry</b> STOCKTON	<div style="display: flex; align-items: center;"> <div style="text-align: center;">  <p>TÜRKİYE CUMHURİYETİ GIDA TARIMSAL VE HAYVANCILIK BAKANLIĞI</p> </div> <div style="margin-left: 20px;">                 Reg. No REX-13587                   Prod. Code 12019000             </div> </div>
<b>8 - Distinguishing marks: number and description of packages: name of the product: botanical name of plants</b>  <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;">                 HRU-001;HRU-00 2             </div> <div style="width: 30%;">                 0 IN BULK             </div> <div style="width: 30%;">                 SOYBEAN <i>Glycine max (L.)</i> </div> </div>	<b>9 - Quantity declared</b>  <div style="display: flex; justify-content: space-between;"> <div style="width: 40%;">                 Net Kgs             </div> <div style="width: 20%; text-align: center;">                 (b) (4)             </div> <div style="width: 40%;">                 Gross Kgs             </div> </div>
<b>10 - This is to certify that</b> <ul style="list-style-type: none"> <li>- the plants, plant products or other regulated articles described above were imported into the Republic of Turkey (country of re-export) from.....(country of origin) covered by Phytosanitary Certificate No. .... original <input type="checkbox"/>* certified true copy <input type="checkbox"/>* of which is attached to this certificate;</li> <li>- they are packed <input type="checkbox"/>* repacked <input type="checkbox"/>* in original <input type="checkbox"/>* new <input type="checkbox"/>* containers,</li> <li>- based on the original Phytosanitary Certificate <input type="checkbox"/>* and additional inspection <input type="checkbox"/>*, they are considered to conform with the current phytosanitary requirements of the importing country, and</li> <li>- during storage in the Republic of Turkey (country of re-export), the consignment has not been subjected to the risk of infestation or infection.</li> </ul> <p>(*) Insert tick in appropriate boxes</p>	
<b>11 - Additional declaration</b>  SEE ATTACHMENT	
<b>DESINFESTATION AND/OR DISINFECTION TREATMENT</b>	<b>18 - Place of issue</b>
<b>12 - Treatment</b> XXXXXXNONEXXXXXXX	Date MERSIN 4 November 2016
<b>13 - Chemical (Active Ingredient)</b> XXXXXXNONEXXX	<b>14 - Duration and Temperature</b> XXXXXXNONEXXX
<b>15 - Concentration</b> XXXXXXNONEXXX	<b>16 - Date</b> XXXXXXNONEXXX
<b>17 - Additional Information</b> XXXXXXNONEXXXXXXX	Name and Surname of the authorized representative of the Organization (b) (6) AHMET ESAT TÜRKMEN INSPECTOR

**Yasal Uyarı:** Bitki Sağlık Sertifikasını sahte olarak düzenleyen, başkalarını aldatacak şekilde değiştiren veya kullanan kişiler 5237 sayılı Türk Ceza Kanunu 204. Maddesine göre iki yıldan beş yıla kadar hapis cezası ile cezalandırılır.  
**Legal Notice:** The person who arrange fraudulent Phytosanitary Certificate or Change or use the Phytosanitary Certificate in such a way to deceive other people shall be punished with penalty of imprisonment from two to five years in accordance with Article 204 of Turkish Penal Code numbered 5237.

REPUBLIC OF TURKEY

MINISTRY OF FOOD,  
AGRICULTURE AND LIVESTOCK

ATTACHMENT SHEET FOR  
PHYTOSANITARY CERTIFICATE OR  
PHYTOSANITARY CERTIFICATE  
FOR RE-EXPORT

TÜRKİYE CUMHURİYETİ



PHYTOSANITARY CERTIFICATE OR  
RE-EXPORT PHYTOSANITARY CERTIFICATE

NO

EC/TRA

0140367

DATE

04.11.2016 00:00:00

TO: THE PLANT PROTECTION ORGANIZATION(S) OF

UNITED STATES OF AMERICA

ADDITIONAL OFFICIAL PHYTOSANITARY INFORMATION

- Ek Deklarasyon (Additional Declaration) (Box 11)  
- COMM. INV: (b) (4) - FARMER CODE (LOT NO): HRU-001; HRU-002 , - HOLD#5, -CUSTOMER LOT  
NO:LT0050130, - SHIPMENT WAS INSPECTED AND FOUND  
TO BE FREE OF KHAPRA BEETLE (TROGODERMA GRANARIUM)  
This phytosanitary certificate is issued instead of the certificate numbered 0140061 and dated 27/10/2016.

PLACE OF ISSUE

MERSİN

DATE ISSUED

04.11.2016 00:00:00

NAME AND SIGNATURE

(b) (6)

OFFICER

STAMP OF ORGANIZATION

AHMET/ESAT TÜRKMEN  
INSPECTOR



1. İhracatçı Consignor Expéditeur	No N 0299227	ORJİNAL ORIGINAL ORIGINAL
BEYAZ AGRO İTH. İHR.SAN.VE TIC. A.Ş. BUDAK MAH. 10031 NOLU SOK. NO:42 YASEM İS MERKEZİ KAT:10 D:1016-1017 SEHİTKAMİL - GAZİANTEP - TURKEY	<b>MENŞE ŞAHADETNAMESİ</b> <b>CERTIFICATE OF ORIGIN</b> <b>CERTIFICAT D'ORIGINE</b>	
2. Alıcı Consignee Destinataire		
AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY, VA 22815 USA PHONE: +1 540-246-3231	3. Menşe Ülkesi Country of Origin Pays d'origine	UKRAINE
4. Taşıma İlişkin Bilgiler (Tercihe Bağlı) Transport Details (Optional) Informations relatives au transport (mention facultative)	5. Gözlemler Remarks Remarques	
BY VESSEL M/V "DIAMOND FOUR"		
6. Sıra No; kolilerin marka ve işaretleri, sayı ve türleri; eşyanın tanımı Item number; marks, numbers, number and kind of packages; description of goods Numéro d'ordre - Marques, numéros, nombre et nature des colis - Désignation des marchandises	7. Miktar Quantity Quantité	(b) (4)
NON GMO SOYBEANS IN BULK - SELLER ORDER NO: BYTSON15363 - COMMERCIAL INVOICE NO: (b) (4) - FARMER CODE (LOT NO): HRU-001; HRU-002 - HS CODE: 1201.90.00 - CUSTOMER LOT NO:LT0050128 - HOLD NO:1		NÖ 10266
8. Yukarıda Tanımlanan Eşyaların 3 Nolu Kutuda Belirtilen Ülke Menşeli Olduğu Tasdik Olunur. The Undersigned Authority Certifies That The Goods Described Above Originate In The Country Shown In Box 3 L'autorité soussignée certifie que les marchandises désignées ci-dessus sont originaires du pays figurant dans la case No 3		
CHAMBER OF COMMERCE		Mustafa ASLAN Ticaret ve Sanayi Müdürü
7.12.2016	GAZİANTEP / TURKEY	(b) (6)
Düzenleme Yeri ve Tarihi, İsim, İmza ve Yetkili Mercininin Mührü Place and date of issue, name, signature and stamp of competent authority Lieu et date de délivrance, désignation, signature et cachet de l'autorité compétente		

1. İhracatçı Consignor Expéditeur	No N 0299228	ORJİNAL ORIGINAL ORIGINAL
BEYAZ AGRO İTH. İHR.SAN.VE TIC. A.Ş. BUDAK MAH. 10031 NOLU SOK. NO:42 YASEM İS MERKEZİ KAT:10 D:1016-1017 SEHİTKAMİL - GAZİANTEP - TURKEY	<b>MENŞE ŞAHADETNAMESİ CERTIFICATE OF ORIGIN CERTIFICAT D'ORIGINE</b>	
2. Alıcı Consignee Destinataire		
AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY, VA 22815 USA PHONE: +1 540-246-3231	3. Menşe Ülkesi Country of Origin Pays d'origine	UKRAINE
4. Taşıma İlişkin Bilgiler (Tercihe Bağlı) Transport Details (Optional) Informations relatives au transport (mention facultative)	5. Gözlemler Remarks Remarques	
BY VESSEL M/V "DIAMOND FOUR"		
6. Sıra No; kolilerin marka ve işaretleri, sayı ve türleri; eşyanın tanımı Item number; marks, numbers, number and kind of packages; description of goods Numéro d'ordre – Marques, numéros, nombre et nature des colis – Désignation des marchandises	7. Miktar Quantity Quantité	
NON GMO SOYBEANS IN BULK - SELLER ORDER NO: BYTSON15363 - COMMERCIAL INVOICE NO: (b) (4) - FARMER CODE (LOT NO): HRU-001; HRU-002 - CUSTOMER LOT NO:LT0050129 - HS CODE: 1201.90.00 - HOLD NO:3	(b) (4)	
8. Yukarıda Tanımlanan Eşyaların 3 Nolu Kutuda Belirtilen Ülke Menşeli Olduğu Tasdik Olunur. The Undersigned Authority Certifies That The Goods Described Above Originate In The Country Shown In Box 3 L'autorité soussignée certifie que les marchandises désignées ci-dessus sont originaires du pays figurant dans la case No 3	CHAMBER OF COMMERCE 7.12.2016 GAZİANTEP / TURKEY Mustafa ASLAN (b) (6) 2016	
Düzenleme Yeri ve Tarihi, İsim, İmza ve Yetkili Mercinin Mührü Place and date of issue, name, signature and stamp of competent authority Lieu et date de délivrance, désignation, signature et cachet de l'autorité compétente		

1. İhracatçı Consignor Expéditeur	No N 0299229	ORJİNAL ORIGINAL ORIGINAL
BEYAZ AGRO İTH. İHR.SAN.VE TIC. A.Ş. BUDAK MAH. 10031 NOLU SOK. NO:42 YASEM İS MERKEZİ KAT:10 D:1016-1017 SEHİTKAMİL - GAZİANTEP - TURKEY	<b>MENŞE ŞAHADETNAMESİ CERTIFICATE OF ORIGIN CERTIFICAT D'ORIGINE</b>	
2. Alıcı Consignee Destinataire		
AGROPEX INTERNATIONAL INC. 413 SOUTH MAIN STREET BROADWAY, VA 22815 USA PHONE: +1 540-246-3231	3. Menşe Ülkesi Country of Origin Pays d'origine	UKRAINE
4. Taşımaya İlişkin Bilgiler (Tercihe Bağlı) Transport Details (Optional) Informations relatives au transport (mention facultative)	5. Gözlemler Remarks Remarques	
BY VESSEL M/V "DIAMOND FOUR"		
6. Sıra No; kolilerin marka ve işaretleri, sayı ve türleri; eşyanın tanımı Item number; marks, numbers, number and kind of packages; description of goods Numéro d'ordre - Marques, numéros, nombre et nature des colis - Désignation des marchandises	7. Miktar Quantity Quantité	(b) (4)
NON GMO SOYBEANS IN BULK - SELLER ORDER NO: BYTSON15363 - COMMERCIAL INVOICE NO: (b) (4) - FARMER CODE (LOT NO): HRU-001; HRU-002 - CUSTOMER LOT NO:LT0050130 - HS CODE: 1201.90.00 - HOLD NO:5		
8. Yukarıda Tanımlanan Eşyaların 3 Nolu Kutuda Belirtilen Ülke Menşeli Olduğu Tasdik Olunur. The Undersigned Authority Certifies That The Goods Described Above Originate In The Country Shown In Box 3 L'autorité soussignée certifie que les marchandises désignées ci-dessus sont originaires du pays figurant dans la case No 3	Mustafa ASLAN Ticaret ve Sanayi Müdürü	
CHAMBER OF COMMERCE	(b) (6)	
7.12.2016	GAZİANTEP / TURKEY	
Düzenleme Yeri ve Tarihi, İsim, İmza ve Yetkili Mercinin Mührü Place and date of issue, name, signature and stamp of competent authority Lieu et date de délivrance, désignation, signature et cachet de l'autorité compétente	7 DEC 2016	



# TRANSACTION CERTIFICATE

For Kiwa BCS use only. A product declaration for raw material or processed goods with the name of  
KIWA BCS ÖKO-GARANTIE GMBH or its guarantee is exclusively restricted to  
KIWA BCS ÖKO-GARANTIE GMBH certified operators!

The Certification Office of KIWA BCS ÖKO-GARANTIE GMBH, Marientorgraben 3-5, D-90402 Nuremberg, Germany

and the company BEYAZ AGRO ITH. IHR. SAN. VE TİC. A.Ş., BUDAK MAH. 10031 NOLU CAD. NO:42 YASEM IS MERK. K:10 D:1016-1017 ZIP CODE: 27090 SEHITKAMIL / GAZIANTEP - TURKEY

herewith certify that the following products, delivered to AGROPEX INTERNATIONAL INC.413 SOUTH MAIN STREET BROADWAY, VA 22815 USA  
Hakan Gıda Warehouse / MERSIN PORT TURKEY

ORGANIC SOYBEANS IN BULK, (b) (4) TOTAL NET, FARMER CODE (LOT NO):  
HRU-001, HRU-002/Customer Lot No:LT0050128,Crop year: 2015,  
BIO INSPECTA CERTIFICATE NO:HR-023-016,HRU-024-16

INVOICE: (b) (4) dtd:03.11.2016  
B/L No:1 dtd: 03.11.2016  
Vessel No:M/V"FOUR DIAMOND" - Hold#1  
Delivery Date: 03.11.2016

was produced according to organic production methods in compliance to USDA-NOP final rule.  
This confirmation is based on the documents presented to KIWA BCS for this file.

Nuremberg, November 15th 2016

(b) (6)

Carolina Cobos  
The Certification Office of  
KIWA BCS ÖKO-GARANTIE GMBH

KIWA BCS ÖKO-GARANTIE GmbH  
Marientorgraben 3 - 5  
D-90402 Nürnberg  
T: +49 911 2543 90  
F: +49 911 2543 220



THE SUPPLIER

The delivery of ..... (date) of ..... kg of .....  
according to attached invoice No. .... date ..... corresponds with the  
above stated and certified quality.

.....  
(Place of supplier, date)

.....  
(Stamp and signature)



# TRANSACTION CERTIFICATE

For Kiwa BCS use only. A product declaration for raw material or processed goods with the name of  
KIWA BCS ÖKO-GARANTIE GMBH or its guarantee is exclusively restricted to  
KIWA BCS ÖKO-GARANTIE GMBH certified operators!

The Certification Office of KIWA BCS ÖKO-GARANTIE GMBH, Marientorgraben 3-5, D-90402 Nuremberg, Germany

and the company BEYAZ AGRO ITH. IHR. SAN. VE TİC. A.Ş., BUDAK MAH. 10031 NOLU CAD. NO:42 YASEM IS MERK. K:10 D:1016-1017 ZIP CODE: 27090 SEHITKAMIL / GAZIANTEP - TURKEY

herewith certify that the following products, delivered to AGROPEX INTERNATIONAL INC.413 SOUTH MAIN STREET BROADWAY, VA 22815 USA  
Hakan Gıda Warehouse / MERSIN PORT TURKEY

ORGANIC SOYBEANS IN BULK, (b) (4) TOTAL NET, FARMER CODE (LOT NO):  
HRU-001, HRU-002 / Customer Lot No:LT0050129, Crop year: 2015,  
BIO INSPECTA CERTIFICATE NO:HR-023-016,HRU-024-16

INVOICE: (b) (4) dtd:03.11.2016  
B/L No:2 dtd: 03.11.2016  
Vessel No:M/V"FOUR DIAMOND" Hold#3  
Delivery Date: 03.11.2016

was produced according to organic production methods in compliance to USDA-NOP final rule.  
This confirmation is based on the documents presented to KIWA BCS for this file.

Nuremberg, November 15<sup>th</sup>, 2016

(b) (6)

Carolina Cobos  
The Certification Office of  
KIWA BCS ÖKO-GARANTIE GMBH



## THE SUPPLIER

The delivery of ..... (date) of ..... kg of .....  
according to attached invoice No. .... date ..... corresponds with the  
above stated and certified quality.

.....  
(Place of supplier, date)

.....  
(Stamp and signature)



# TRANSACTION CERTIFICATE

For Kiwa BCS use only. A product declaration for raw material or processed goods with the name of  
KIWA BCS ÖKO-GARANTIE GMBH or its guarantee is exclusively restricted to  
KIWA BCS ÖKO-GARANTIE GMBH certified operators!

The Certification Office of KIWA BCS ÖKO-GARANTIE GMBH, Marientorgraben 3-5, D-90402 Nuremberg, Germany

and the company BEYAZ AGRO ITH. IHR. SAN. VE TİC. A.Ş., BUDAK MAH. 10031 NOLU CAD. NO:42 YASEM IS MERK. K:10 D:1016-1017 ZIP CODE: 27090 SEHITKAMIL / GAZIANTEP - TURKEY

herewith certify that the following products, delivered to AGROPEX INTERNATIONAL INC.413 SOUTH MAIN STREET BROADWAY, VA 22815 USA  
Hakan Gıda Warehouse / MERSIN PORT TURKEY

ORGANIC SOYBEANS IN BULK, (b) (4) TOTAL NET, FARMER CODE (LOT NO):  
HRU-001, HRU-002 / Customer Lot No: LT0050130, Crop year: 2015,  
BIO INSPECTA CERTIFICATE NO:HR-023-016,HRU-024-16

INVOICE: (b) (4) dtd:03.11.2016  
B/L No:3 dtd: 03.11.2016  
Vessel No:M/V"FOUR DIAMOND" Hold#5  
Delivery Date: 03.11.2016

was produced according to organic production methods in compliance to USDA-NOP final rule.  
This confirmation is based on the documents presented to KIWA BCS for this file.

Nuremberg, November 15<sup>th</sup> 2016

(b) (6)

Carolina Cobos  
The Certification Office of  
KIWA BCS ÖKO-GARANTIE GMBH

KIWA BCS ÖKO-GARANTIE GmbH  
Marientorgraben 3-5  
D-90402 Nürnberg  
T: +49 911 49 23 00  
F: +49 911 49 22 39



## THE SUPPLIER

The delivery of ..... (date) of ..... kg of .....  
according to attached invoice No. .... date ..... corresponds with the  
above stated and certified quality.

.....  
(Place of supplier, date)

.....  
(Stamp and signature)

## TRADE AGENCY AGREEMENT

This agreement made this the 30<sup>th</sup> of November, 2016 between: Hakan Organics DMCC and its affiliates (hereinafter referred to as ("HAKAN")) and Global Natural LLC (hereinafter referred to as "Agent").

### RECITALS

HAKAN engages in organic food and feed raw materials production and trade and exports these products. HAKAN and Agent desire to sell these products in North America (USA and Canada and Mexico). In order to accomplish this goal, HAKAN and Agent agree to enter into business on a sales agency basis.

Now, witness this agreement as follows:

### Article I.

#### TERRITORY & AUTHORIZED PERSONNEL

1. Agent shall act as the sales agent for HAKAN to do business in North America namely USA and Canada and Mexico (hereinafter referred to as the "Territory"), subject to the restrictions set forth herein. HAKAN has agreed not to conclude any sales into the "Territory" without the knowledge and approval of Agent, except for sales to current customers being served in the Territory. It is further understood and agreed that HAKAN'S appointment and authorization of Agent is specific to Agent and shall not be assigned, delegated, transferred, or in any other way assumed by any other person, association, or business entity without HAKAN'S prior written consent, which consent shall not be unreasonably withheld or delayed. Agent may appoint certain subdistributors with HAKAN'S prior approval, which approval cannot be unreasonably withheld or delayed. Notwithstanding the foregoing, Agent may create subsidiaries to operate within the Territory if necessary to assist in meeting any tax, regulatory or other considerations, and such subsidiaries would be approved by HAKAN as authorized assignees.

2. Agent shall assign only those individuals previously approved by HAKAN to conduct the work contemplated hereunder. Agent's work shall be performed solely by the individuals set forth on Exhibit A as may be amended by the mutual agreement of the parties. HAKAN shall be relieved of all obligations under this Agreement and shall have the right to terminate this Agreement immediately in the event that Agent's obligations under this Agreement are assumed or performed during its stated initial term by a non-approved individual.

**Article 2.**

**NON-COMPETITION/NON-SOLICITATION**

1. During the term of this Agreement, while acting as HAKAN's sales agent, Agent agrees not to contract or conclude agreements with any other Turkish or Romanian organic grain producer trader that directly competes with HAKAN without the knowledge and consent of HAKAN, which consent shall not be unreasonably withheld.
2. During the term of this Agreement, and for a period of one (1) year thereafter, HAKAN agrees not to solicit directly or indirectly or hire any employee or independent contractor of Agent or to solicit or induce any customer of Agent to leave or reduce their business with Agent.

**Article 3.**

**NO GOVERNMENT REPRESENTATIVES**

Agent hereby covenants that neither Agent, nor any officer, employee, shareholder, agent, or representative of Agent, is an official or employee of the government within the applicable country or counties or any subdivision thereof; Agent further agrees to notify HAKAN immediately in the event that this covenant ceases to be accurate.

**Article 4.**

**PRODUCTS & SHIPPING**

1. The sales product is Organic grains and oilseeds oils and derivative commodity products offered by HAKAN from time to time
2. HAKAN will ship the organic commodities to the nominated ports in the Territory DDP Delivered Duty Paid; Commodities will be imported to the territory by HAKAN through Agent's advice on the procedures and infrastructure. Title of goods and all risk on commodity including rejection by authorities in the Territory will be on HAKAN until the goods are cleared from customs and discharged in to warehouse

**Article 5.**

**NO RESTRICTION OF ORIGIN.**

HAKAN represents and warrants that There is no restriction of origin of products and Agent may sell and distribute any product offered for sale by HAKAN.

**Article 6.**  
**PERFORMANCE & CONFIDENTIALITY**

1. Agent shall use its best commercial efforts to market and obtain contracts with customers in the "Territory." Agent shall provide HAKAN upon written request any information concerning market developments, prices, trade data and the development of the compound feeds industry in the "Territory" ("Agent Proprietary Information"). Notwithstanding the foregoing, any such Agent Proprietary Information provided by Agent shall be confidential and proprietary to Agent and may not be used by HAKAN for any purpose other than examining and confirming Agent's completion of the duties under this Agreement. Agent shall not without approval disclose any confidential or proprietary information of HAKAN, which is identified as such ("HAKAN Proprietary Information") to any other party of HAKAN.

2. Each party agrees to keep the proprietary information of the other confidential during the term of this Agreement and for a period of two years thereafter and not to disclose such information to any other party, other than financial and legal representatives and representatives within such party who have a need to know to allow such party to perform its obligations under this Agreement and to monitor the performance of the other party under this Agreement.

**Article 7.**  
**CONSIDERATION FOR AGENT.**

1. Commission. In consideration for Agent's services, Agent shall receive commissions for concluded shipments fixed USD 8.00 per Mton on the basis of the quantity of the shipment to be paid upfront within 10 banking days from the shipment date.

Import Price on all commodities shall be set by agreement of the parties prior to the transaction.

2. Profit Sharing. In addition to the commission above, Agent will make the sales to local customers. Profit will be shared on 65% HAKAN, 35% Agent. Cost will be calculated as Import Price, Discharge and Handling cost to Ex warehouse FOT, plus Agents Commission. Such shipping calculation is solely for purposes of determining the profit sharing and does not alter HAKAN's obligation to ship commodities and products DDP Buyer destination.

3. Expenses. Agent shall pay all costs and expenses associated with discharging its responsibilities under this Agreement unless such costs and expenses are approved in writing in advance by HAKAN. HAKAN shall pay all of its costs and expenses associated with discharging its responsibilities under this Agreement unless otherwise expressly set forth herein.

4. Audit Rights. HAKAN shall use commercially reasonable efforts to maintain accurate records relating to its administration, commercialization, sale and transfer of commodities and commissions pursuant to this Article 7. HAKAN agrees that such records shall at all reasonable times and upon reasonable notice be subject to inspection and audit, for the sole purpose of confirming the calculation of the amounts owed to Agent hereunder, by Agent or by a duly authorized third-party representative of Agent, who shall be reasonably approved by HAKAN and

who shall be subject to a confidentiality agreement with HAKAN which prevents the disclosure of HAKAN Proprietary Information generated from such audit to Agent or third parties (other than, in the case of Agent, to confirm the amount of the consideration owed to Agent hereunder). All such audit and inspection shall be at the Agent's cost unless such audit reveals an underpayment by HAKAN of more than five percent (5%) in which event, in addition to paying Agent any underpayment, HAKAN shall reimburse Agent its actual costs. HAKAN shall have no obligation to retain records relating to any calculation of the commissions and profit sharing payable to Agent hereunder for more than three years; provided that the relevant records shall be retained for any longer period necessary to resolve any issues arising from an audit.

**Article 8.**  
**TERM & TERMINATION**

1. This Agreement shall be effective from December 1, 2016 through November 30, 2018. The term shall renew automatically for additional one year terms unless terminated in accordance with the terms of the Agreement.
2. This Agreement may be terminated by the mutual agreement of the parties at any time.
3. This Agreement may be terminated by either party upon prior written notice to the other party not later than sixty (60) days prior to the expiration of the then current term of the Agreement.
4. This Agreement may be terminated by Agent on the one hand, or by HAKAN on the other hand, in the event of any breach by the other party of any of its obligations or commitments under this Agreement, upon sixty (60) days after written notice detailing such alleged breach or actual breach and an opportunity to cure, which breach is continuing after notice thereof; provided, however, that the right to terminate this Agreement pursuant to this Article 8 shall not be available to any Party who is then in material breach of any of its own representations, warranties or covenants under this Agreement.
5. In the event of the termination of this Agreement in accordance with Article 8 hereof, this Agreement shall forthwith become null and void and have no effect, and no party, or any of their respective officers, employees, agents, or representatives shall have any liability to the other Party whatsoever for any future obligations, except that each party shall bear its own costs and expenses and Articles 2, Article 6 as it relates to confidentiality only, Article 7, Article 8, Article 10 and Articles 11 through and including Article 18 shall survive such termination indefinitely or for the time periods noted therein.

**Article 9.**  
**NO LIABILITY/OBLIGATION**

Agent shall not be responsible for HAKAN's compliance with those regulations described in contract terms and conditions, but shall, as sales agent, provide advice and negotiation as needed in order to ensure compliance. The parties agree that in carrying out their duties and responsibilities under this Agreement, they will neither undertake nor cause, nor permit to be undertaken, any activity which either (i) is illegal under any laws, decrees, rules, or regulations in effect in either the United States, the Territory countries or any other applicable countries; or (ii) would have the effect of causing the

other party to be in violation of any laws, decrees, rules, or regulations in effect in either the United States, the Territory countries or any applicable countries.

**Article 10.**  
**INDEMNIFICATION**

1. Agent agrees to indemnify and to hold harmless HAKAN, its officers, employees, and agents, from and against any claims, demands, causes of actions, loss, cost, and expense, arising from, in connection with, or based upon the actions or omissions of Agent, its officers, employees, agents, or representatives.
2. HAKAN agrees to indemnify and to hold harmless Agent, its officers, employees and agents from and against any claims, demands, causes of actions, loss, cost and expense, arising from, in connection with or based upon the actions or omissions of HAKAN, its officers, employees, agents or representatives, including, but not limited to any infringement on any third party intellectual property rights.
3. Notwithstanding anything to the contrary contained herein, in no event shall Agent or HAKAN be liable to the other for, and Agent and HAKAN hereby waive, to the fullest extent permitted under applicable law, the right to recover incidental, consequential (including, without limitation, lost profits, loss of use or loss of business opportunity), punitive, exemplary and similar damages.
4. HAKAN shall carry cargo insurance that will at a minimum cover the base commission of any Products shipped, plus ten percent (10%) over the CIF value of each cargo.

**Article 11.**  
**INDEPENDENT CONTRACTOR RELATIONSHIP**

Agent acknowledges and agrees that Agent is and shall be an independent contractor and not an employee of HAKAN. Agent shall be responsible for any and all taxes, expenses, premiums, contributions and other payments arising from my income and the activities Agent conducts under this Agreement. Agent shall not be eligible for any employee benefit programs under this Agreement, including, but not limited to, leave of any type; unemployment or disability compensation, retirement, health care or death benefits. Agent is responsible to obtain any business or other permits required by law or public authority relating to the operation of Agent's business

**Article 12.**  
**ENTIRE AGREEMENT**

This Agreement and all exhibits hereto, contains the entire understanding of the parties on this subject, and supersedes all previous verbal and written agreements with respect to the same or similar matters. No amendment, modification, waiver, cancellation or termination of this Agreement or any of its provisions shall be effective unless writing and signed by both parties.

**Article 13.**  
**GOVERNING LAW/VENUE/WAIVER OF JURY TRIAL.**

1. This Agreement shall be governed by and interpreted in accordance with the applicable domestic laws of the state of Maryland, U.S.A., excluding its principles of conflicts of laws and excluding the Convention on Contracts for the International Sales of Goods. The parties hereto irrevocably submit to the jurisdiction and venue of the federal district court located in Baltimore Maryland to resolve any dispute related hereto or arising hereunder.

2. EACH OF THE PARTIES HERETO WAIVE THE RIGHT TO TRIAL BY JURY IN ANY LEGAL PROCEEDING ARISING OUT OF OR RELATING TO THIS AGREEMENT OR ANY ACTIONS ASSOCIATED WITH THIS AGREEMENT.

**Article 14.**  
**NOTICES.**

1. All notices must be in writing and shall be valid upon receipt when delivered by hand, by nationally recognized courier service, or by First Class United States Mail, certified, return receipt requested or by email notice provided such email is followed up promptly with one of the other delivery methods specified above to the addresses set forth herein:

to Agent at: Global Natural, LLC  
104 Bayview  
Grasonville, Maryland 21638

with copy to (which shall not be deemed notice):

Colleen Pleasant Kline, Esquire  
c/o Miles & Stockbridge P.C.  
100 Light Street  
Baltimore, Maryland 21202  
ckline@milesstockbridge.com

to HAKAN at: Beyaz Agro İth. İhr. San. ve Tic. A.Ş.  
Budak Mah. 10031 Nolu Sok. No:42 Yasem  
İs Mrk. K:10 D:1016-1017 Zip Code: 27090  
Şehitkamil / Gaziantep – TURKEY

with a copy to (which shall not be deemed notice):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Any of the Parties, by thirty (30) days prior written notice to the others in the manner provided herein, may designate one or more different notice addresses from those set forth above. Refusal to accept delivery of any notice or the inability to deliver any notice because of a changed address for which no notice was given as required herein, shall be deemed to be receipt of any such notice.

**Article 15.**  
**Counterparts.**

This Agreement may be executed in several counterparts, each of which when so executed and delivered, shall be deemed an original and all of which, when taken together, shall constitute one and the same instrument, even though all Parties are not signatories to the original or the same counterpart. Furthermore, the Parties may execute and deliver this Agreement by electronic means such as .pdf or similar format. Each of the Parties agrees that the delivery of the Agreement by electronic means will have the same force and effect as delivery of original signatures and that each of the Parties may use

such electronic signatures as evidence of the execution and delivery of the Agreement by all Parties to the same extent as an original signature.

**Article 16.**  
**FORCE MAJEUR**

Neither party shall be liable, nor shall any credit allowance or other remedy be extended for any failure of performance or equipment due to acts of God, wars, revolution, civil commotion, acts of public enemy, acts of government in its sovereign capacity government codes, ordinances, laws, rules and regulations, condemnation or exercise of eminent domain, labor difficulties, including but not limited to, strikes, slowdowns, picketing or boycotts or any other circumstances beyond the reasonable control of and not involving any fault or negligence of the party delayed or unable to perform due to such circumstances that are beyond such party's reasonable control. Each party shall use commercially reasonable efforts under the circumstances to avoid or remove such causes of non-performance at the earliest moment following the conclusion or cessation of the event of force majeure.

**Article 17.**  
**ASSIGNMENT**

Neither Party may assign this Agreement without the express written consent of the other Party, which consent cannot be unreasonably withheld. However, upon assignment to an affiliate with a controlling interest or parent of the assigning party, or upon assignment by merger or acquisition, giving notice to the other Party is sufficient.

**Article 18.**  
**OTHER MISCELLANEOUS PROVISIONS**

1. **Headings.** Headings in this Agreement are strictly for convenience and shall not in any way be construed as interpretation, either to amplify or limit any of the terms within.
2. **Severability.** If any Article or clause within this Agreement is held to be invalid or unenforceable, then the meaning within shall be construed as to render it enforceable to the extent feasible. If no feasible interpretation exists, then it shall be severed from the Agreement and all other terms and provisions of the Agreement shall remain in full force and effect. In the event that a clause is an essential element of the Agreement, then the parties shall promptly negotiate a replacement section or clause that will achieve the intent of the unenforceable section to the extent permitted by law.
3. **Counsel.** Each party hereto acknowledges that it has had the opportunity to seek review from its own counsel prior to execution of the Agreement. The drafting party shall not be considered to have any advantage over the non-drafting party in the event that legal interpretation of this document is required.
4. **Performance.** All actions, activities, consents, approvals and other undertakings of the parties in this Agreement shall be performed in a reasonable and timely manner.

5. Counterparts. This Agreement may be executed simultaneously, including via facsimile, in one or more counterparts, each of which shall be deemed an original, but all such counterparts shall together constitute one and the same instrument.
6. Binding Effect. This Agreement shall be binding upon and inure to the benefit of Seller, Buyer and the Companies and their respective heirs, next-of-kin, personal representatives, successors and assigns.
7. Section Headings. The Section and other headings of this Agreement are for convenience of reference only and shall not affect the meaning or interpretation of this Agreement.
8. Payment of Attorneys' Fees. If the parties to this Agreement become parties to arbitration proceeding or litigation arising from or relating to this Agreement, the non-prevailing party shall pay the reasonable attorneys' fees and costs incurred by the prevailing party in such arbitration or litigation, and this provision shall not be merged into any judgment.

**[THIS SPACE LEFT INTENTIONALLY BLANK.**  
**SIGNATURE PAGE TO FOLLOW.]**

**SIGNATURE PAGE TO TRADE AGENCY AGREEMENT**

**IN WITNESS WHEREOF** the parties hereto have executed this Agreement as of the date referenced below:

**HAKAN ORGANICS DMCC**

BY: GOKSAL BEYAZ  
Print Name:  
TITLE: General Coordinator



DATE: 19.12.2016

**GLOBAL NATURAL, LLC**

BY: J. Michael Spangl  
Print Name:  
Title: Manager



DATE: December 19, 2016

Sworn Statement

I, Michael Spangler, being first duly sworn on oath, make the following statement freely and voluntarily to Andrew Regalado, who has identified himself to me as a Compliance Specialist, National Organic Program, United States Department of Agriculture, knowing this statement may be used as evidence.

My full name is Michael Spangler and I am the owner<sup>^</sup> of Global Natural, LLC (GNL), located AT <sup>^</sup> (b) (6) 303 Second Street, <sup>^</sup> ANNE ARUNDEL COUNTY, MD, 21403. <sup>^</sup> AND MANAGING PARTNER

Background

On Thursday, April 13, 2017, National Organic Program (NOP) staff (Mark Bradley, Vella (Kay) Holmes) traveled to Annapolis, Maryland to the offices of Global Natural, LLC. The visit was part of an ongoing investigation into complaints received regarding fraudulent grain being imported into the U.S. from Eastern Europe. This is my statement.

GNL, Hakan Agro, Beyaz Agro, Agropex

GNL is a new company that was established in 2016. GNL consists of three partners in various locations around the country and a small administrative staff in Annapolis, Maryland. GNL was certified as an organic handler by Pennsylvania Certified Organic (PCO) in December 2016. Included within the scope of my certification with PCO is a Baltimore storage facility called Access World.

GNL is in the business of selling grains, however, GNL does not own the grain it sells. The grain is owned by Hakan Agro DMCC (Hakan). GNL is a sales agent for Hakan and operates under an agency contract. GNL's agency contract is directly with Hakan, not with Agropex. Per

(b) (6)

my contract with Hakan, all reporting of sales for the contract goes to Beyaz Agro located in Gaziantep, Turkey. Further, per the contract, Goksal Beyaz, Hakan's General Coordinator, signed my contract with Hakan.

*TO MY KNOWLEDGE*  
*EFFECTIVELY*  
Hakan Agro DMCC and Beyaz Agro are the same organization. Specifically, Goksal Beyaz works for Hakan and Beyaz Agro is a functional part of the Hakan organization.

*QUESTIONS ABOUT*  
[ In response to GNL's relationship to Agropex, ] GNL simply acts as a sales agent and is paid a commission on the sales. However, the outward appearance of the process is one of GNL purchasing the grain from Agropex and subsequently selling it to GNL's clients.

American Grain Importer's Association

*IT APPEARS THAT*  
There is a "shell organization" that has been established by a DC law firm called the "American Grain Importer's Association" (AGIA). It is my understanding ~~is~~ that the organization was established by the law firm "Holland and Knight" with the contact person (b) (6). The organization has attempted to represent itself as an official U.S. industry group in an attempt to obtain documents from the Turkish Government and to force actions on U.S. businesses (e.g. Global Natural). It is my understanding ~~is~~ that AGIA has no members; it is a fake organization established on behalf of persons unknown to me to try to police other businesses.

M/V Crinis and M/V Four Diamonds

I have provided a file of documents related to the shipments loaded ~~at~~ (b) (6) the vessel Crinis and discussed the document flow and trace-back for the loads. ~~It was~~ *I* ~~that~~ there was not sufficient documentation available to fully trace the load back to a producer source. I stated that U.S. handlers do not have that kind of access to documents. Although, I attempt to get as much

(b) (6)

information on the loads as possible, upstream suppliers will not release documents nor will foreign governments provide copies of phytosanitary certificates or respond to requests for more information.

When asked about my knowledge about phytosanitary certificates associated with the grains

loaded on the vessel Four Diamonds, I provided additional certificates that were sent to me by an-

~~anonymous person~~. These certificates were Turkish phytosanitary certificates that linked the

Four Diamond load to four Ukrainian phytosanitary certificates that showed fumigation. When

asked about these certificates, I stated that I was confused by the seemingly conflicting

certificates and that I had not noticed that the annotation on the attachment to the subsequent

certificate that it was issued "instead of..." the previous certificate. When this information was

pointed out to me, it became apparent to me that the grain I was selling from the Four Diamond

had been fumigated. In response to this information I ~~will~~ immediately stop selling grain from

the Four Diamond as organic. Further, I will wait until I had <sup>ed</sup> confirmed the organic status of the

shipment loaded onto the Crinis before selling any grain from it as organic. I further agree to not

communicate this situation beyond my <sup>GNL</sup> local office and lawyers until I hear back from the NOP.

//////// End of Statement //////////

I have read this statement consisting of 4 pages and it is true and complete. I have made all necessary additions and corrections and I have signed or initialed every page.

(b) (6)

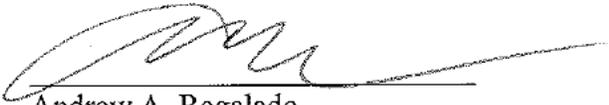
Date: 4.18.17

(b) (6)

Signature

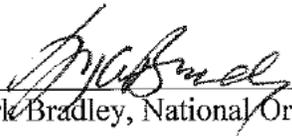
Global Natural, LLC

Subscribed and sworn before me this 18<sup>th</sup> day of April, 2017



Andrew A. Regalado  
Compliance Specialist  
National Organic Program  
U.S. Dept. of Agriculture

Witnesses:



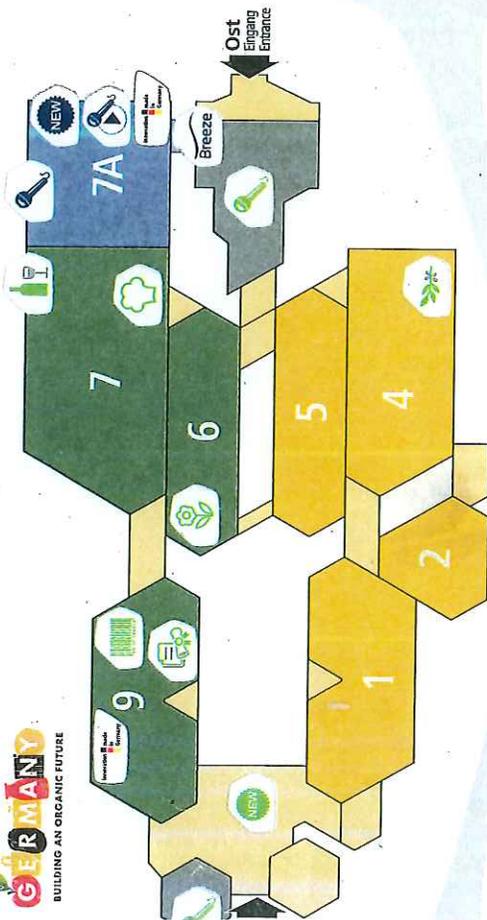
Mark Bradley, National Organic Program, U.S. Dept. of Agriculture



Vella Holmes, National Organic Program, U.S. Dept. of Agriculture

# BIOFACH / VIVANESS im Überblick

## BIOFACH / VIVANESS at a glance



### BIOFACH2017

into organic

- BIOFACH Neuheitenstand**  
BIOFACH Novelty Stand
- Erlebniswelt GASTRONOMIE**  
Experience the world of HoReCa
- Erlebniswelt OLIVENÖL**  
Experience the world of OLIVE OIL
- Erlebniswelt VEGAN**  
Experience the world of VEGAN
- Erlebniswelt WEIN**  
Experience the world of WINE
- Fachhandelestreif**
- Gemeinschaftsstand**  
Junge Innovative Unternehmen  
Young Innovative Companies pavilion
- Treffpunkt Generation Zukunft**  
Generation Future Network Hub
- BIOFACH Kongress**  
BIOFACH Congress

### VIVANESS2017

into natural beauty

- VIVANESS Neuheitenstand**  
VIVANESS Novelty Stand
- Breeze - Internationale Newcomer VIVANESS**  
Breeze - International Newcomers
- VIVANESS on stage**
- VIVANESS Kongress**  
VIVANESS Congress
- Gemeinschaftsstand**  
Junge Innovative Unternehmen  
Young Innovative Companies pavilion

Veranstalter · Organizer  
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F +49 9 11 86 06-8228  
info@biofach.de  
www.nuernbergmesse.de

Alle Angaben ohne Gewähr,  
Änderungen vorbehalten.  
Subject to change.

## Messebegleiter | Exhibition Guide

Nürnberg, Germany  
15. - 18.2.2017  
**BIOFACH2017**  
into organic

Weltleitmesse für Bio-Lebensmittel  
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1086170-MBGL-01-1-D-E-01-17



## Ausstellerliste BIOFACH BIOFACH list of exhibitors

Aussteller Exhibitor	Halle/Stand Hall/Stand	Aussteller Exhibitor	Halle/Stand Hall/Stand
BAOBAB des Saveurs	4-269	BERRIFFINE	1-131
Baobab Foods	2-307	BERRYNEST	5-345
Baobab Products	4-269	Beutelsbacher	1-427
Mozambique	1-241	Fruchtsaftkellerei	7-311
BARBERA INTERNATIONAL	7-657	BEYAZ AGRO	9-565a
Barnhouse Naturprodukte	9-664	B-G Fruits & Nuts	1-377
Barrique	9-516	Manufacturing Corporation	5-171
BARTH - Thermo Future Box	9-309	BGA Bio Getreide Austria	1-585
Barthel - Maschinen und Ingenieurbüro	2-315	BGL Lager	5-130
Bascam Family Farms	7-549	BIA - THE COUSCOUS	5-422
Bastiaansen Bio Kaas	4-211	SPECIALISTS	5-422
BATTISTA CAFFE'	7-516	Biemme	1-411, 1-417
BAUCKHOF NATURKOST	4-211	BIFIX Wojciech Piasecki Sp.J. - Tea producer	2-140
BAUER	9-373	Bingenheimer Saatgut	7-311
Bauer Fruchtsaft	6-311	BIO am SUND	6-220
Bäuerliche Erzeugergemeinschaft Schwäbisch Hall	4-411	BIO-Fachhandel in Deutschland	9-180
Baule Volante	1-175	Bio-Kontor 7	6-352
Bavicchi	1-128	Bio Manufaktur Elm	6-238
BBB - GOOD GOUT	1-126	Bio Romania Tulcea	4-561
BEANWORKS	5-245	Bio Strohhalm	9-521
SEEDS & GRAINS	6-227	BIO A LA UNE.COM	1-221
BEAUTY Aloe Beer	1-128	Bio Aus Dänemark	5-107
beckers bester	4-164	BIO AUSTRIA	1-365, 7-167
BEENDHI	7-255	Bio Berry Poland	6-463
Beer of Yerevan	2-515	Bio Beirao produces organic mushrooms	1-609
Bejo Samen	1-251	Bio Benjamin	9-651
BELECO	1-251	BIO CANA - MIGUEL GARCIA	5-345
BELFOND	1-251	SANCHEZ EUROCATELL	2-215
Belgium/Flanders Investment & Trade	1-155; 1-151; 1-251	Bio Diets EU (Pure Life)	2-335
BELOURTHE SA, Organic Baby food, Hydrolyzed fours	1-261	Bio Eco Actual	4-769
BEITANE NATURKOST	6-325	Bio Foods	9-281
Belts Bioproducte	5-449	BIO Geflügelhof Deersheim	2-411
BeOrigin	7-646	BIO GRAINS ARBENTINE	1-471
Berchtesgadener Land	6-367	GRAIN EXPORTER	7-167
Milchwerke	5-128	BIO Hüllinger	5-378
Berga Bruk	1-427	BIO HOTELS	1-261
Berghof, Restaurant- Käserei Berghof, Schweiz	9-282	BIO ILLES BALEARS	6-235
Berief Food	9-373	Bio Info	6-235
Berlin-Brandenburg	4-305	Bio Kartoffel Nord	6-235
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		BIO ORGANICA ITALIA	4-463
		Bio Planet	4-463

## Ausstellerliste BIOFACH BIOFACH list of exhibitor

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BIO SUD OUEST FRANCE	1-131	Biosanica Manufaktur	6-125
BIO SUDTIROL	7-371	BIOSERVICE Zach	1-265
Bio Suisse	1-427	BIO SOLIDALE	
Bio Tiefkühlkost	7-311	DISTRIBUZIONE	4-653
bio verlag	9-565a	Biosteril	9-473
BIO vom BERG - Bioalpin egen	1-377	BioStyle	2-331
Bio Wafelprodukte	5-171	BioTaurus Fritznierer	7-817
bio.inspecta	1-585	BioTee Manufaktur Hessen	6-159
BIO+ TRADING COMPANY	5-130	BIOTERRA	4-126
BIO4Pack	5-422	BIOTROPIC	7-245
BIOAGRICERT / BIOAGRICOOP	1-411, 1-417	Biotta	9-227
Bioagricert Organismo di controllo e certificazione	1-411	Biovegan	7-458
BioArt	1-465	Bio-Verbraucher	9-471
BioBandits	5-118	Bio-Verde Naturfeinkost	6-441
BIOBITES	5-204	BIOVERI	1-319
Biobotanicals.	1-241	Biovitis	7-743
Bio-Bulgaria	2-529	BIOVITA NATURKOST	9-477
Bio-Center ZANN	7-821	Biovium	7-479
Bioconcept - Gardenia	2-633	Bioweingut Dietmar und Michaela Weinreuter	7-741
BioCore	5-203	BIO Welt - Das Magazin für den gesamten Biomarkt	7-447
BIODATTES	2-542	Bio-Zentrale Naturprodukte	9-319
Biodiva	9-471	BIRRADAMARE Italian Organic Beer	4-653
Biodora - Dora's	1-479	BISCOTTIFICIO VERONA	4-511
Biodynamische Getreidezüchter	7-311	BISCRU	1-321
Bioedelplize Altmarkt	9-281	BISCUITS BOUVARD	1-227
BIOFACH World	1-451	BISTER	1-261
Biofidel	5-171	Bits & Byteservice und lernen	7-207
BIOFINO	6-346	BioNext	4-551
Biofleisch NRW	7-348	BIOORTO	4-603
BIOFOOD TOURAINE	1-127	BIOPAP® - CARTONSPECIALIST	4-164
BIOFOURNIL	1-121	BIOPARK MARKET	6-138
BIOFRESCO	2-129	Biopilzhof	1-427
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BIOGARONNE	1-131	BIOPORC	1-213
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Mauracher	5-171	BIO'S PRODUZIONE E DISTRIBUZIONE	6-331
BioHungarian	4-651	BIO SATOR	6-448
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## Ausstellerliste BIOFACH BIOFACH list of exhibitors

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FLAMMKUCHEN - GFS	9-178	FROST	1-632	Gerada	4-159
Flaska	1-118	FRUCHIES	5-115	GERMLINE	1-221
FLAT BAG	4-429	FRUCTIVIA	6-113	GESA Gemüsesaft	6-113
Fleischwerke E. Zimmermann	6-431	La Panacée des Plantes	1-131	Gesellschaft für Ressourcenschutz	6-227
FLOR DE DONANA	5-331	Fruit d'Or	4-305	GESTAL 2000	1-241
BIORGANIC	6-276	FRUJO	5-159	Gewürzmühle Brecht	6-139
FloraGard Vertriebs	6-276	Frusano	6-325	GFI Greenfood International	5-461
Florentin Organic Kitchen	5-301	Frutas frescas y marmeladas biologicas y DEMETER	5-361	Gianini, Canepari & Partners	4-211
Flores Farm	7-103	FRUTIP...ROLA	2-430	Gianmarco Viola	4-729
followfood / followfish	6-415	Frutti Felici Bio Soc. Agric.	1-142	Ginette Belgian organic beer	1-663
Font negre - MÀ SARAH	5-261	FZ Organic Food	7-625	Ginger People	7-758
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Food - Made in Germany	6-235	G.K Studio Gustaw Kubara	1-615	gittis Naturprodukte	1-377
Food For Life Baking	2-130	G.P. „BIO-FOOD ROZTOCZE“	2-633	GIZ GREEN INNOVATION CENTERS	4-669
Food Solution	5-115	Gäa - Vereinigung ökologischer Landbau	9-309	GIZ GREEN INNOVATION CENTERS - ORGANIC AGRICULTURE WORKING GROUP	4-669
FoodEast Trade	1-341	Galeks-Agro	5-255	GANDOLA BISCOTTI	1-169
Foodie Noodle	1-213	Gaika, Alfred	7-107	Gläserne Molkerei	6-460
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Foodtech Solutions	9-556	Gartenbauzentrale	6-450	Global Nature Fund	9-471
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FRANCE CAKE TRADITION	1-128	Gelato Classico	6-463	Go4Raw	9-631
FRANK ERHARDT	7-311	Die Eismanufaktur	6-463	Goji-Hof Dereumberg (Harz) - Bioland	9-451
FRANK'S NATURPRODUKTE	1-479	Gelato Club	4-429	Gold Coast Ingredients	1-608
Frankonia	9-176	GelatoMio Eismanufaktur	7-420	Golden Peanut	9-429
FRDP - Bioregard	1-321	GELFRUIT ITALIA	4-354	Golfèra in Lavezzola	4-521
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Friedrich Lütvoigt	6-227	Georg Thalhammer - Gesundes vom Feld und Wald	9-548	Gottfried Wicklein	6-429
Friiland J. Hansen	5-115	GEVITA GROUP	4-431	Gottschaller Biohofbäckerei	7-158
Frischland Demeter Fleisch- und Wurstspezialitäten	6-211	GEPA - The Fair Trade Company	6-264	Govi Farm - Zanichelli & Govi	1-268
fritz Kulturgüter	9-203				
FROMAGERIE DES ARDENNES	1-261				

## Ausstellerliste BIOFACH BIOFACH list of exhibitor

Aussteller Exhibitor	Halle/Stand Hall/Stand	Aussteller Exhibitor	Halle/Stand Hall/Stand	Aussteller Exhibitor	Halle/Stand Hall/Stand
Govinda Natur	7-507	Habib -ADM	2-539	HELADOR- DIE FEINE	
Graanhandel P. van Schelven	2-141	HaciendasBio	7-404	EIS-MANUFAKTUR	
Grace Bio Company	1-213	Hädecke Verlag	6-132	Heiden Snacks	
Grain Millers	2-323	HadiKlaim	5-152	HELIOS PASTA INDUSTRY	
Granarolo	1-588	<b>HAKAN ORGANICS</b>	1-150	Hempco Canada Superfoods	
GRANDA TRADIZIONI	1-154	Halliovic	5-172	Hempco International	
Granit-Agro	5-255	Hamlitisch	1-371	Henry Lamotte Oils	
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Great Eastern Sun	2-315	Hamstead Tea London	7-407	HerbarPack	
Great Northern Maple Products	4-305	HANAUER KLAUS	6-168	Herbaria Kräuterparadies	
GREEN BRANDS-Organisation	9-471	Handelskantor Willmann für Naturprodukte	7-307	Herbert Schümann	
GREEN NET FIRST THAI CERTIFIED ORGANIC FAIRTRADE	1-213	Hanegal	5-107	Papierverarbeitungswerk	
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Greenfox Naturtec	9-150	HANFLAND	1-571	HERDADE DOS LAGOS	
Green-Gro,		HANGZHOU OUJI FOOD	2-540	Hermes International	
Manufacturer neem products	4-269	Hannoversche Kaffee-manufaktur	6-235	Hermes Tarim Urunleri	
GREENFOOD:		Happy Cheeze	9-619	Herza Schokolade	
100% BIO-VEGAN	5-331	Happy Goat	5-305	Herzberger Bäckerei	
Greenlid	4-107	Happy Coco	7-758	HEU-HEINRICH Vertriebs	
GreenVard Frozen Belgium	1-155	HAPPYLIFE	4-732	HEUMANN PAUL	
Grillmaier Bioweingärtnerei	7-741	Härdtner Spezialitäten	7-311	Heuschrecke Naturkost	
Grissinificio Europa	4-321	HARKE PHARMA	6-129	HEYQUT	
Grower's Cup	5-109	Harraz For Food Industry & Natural Product	4-551	Hierl Naturkost	
Growers International		Harter Oberflächen- und Umwelttechnik	9-150	High Quality Organics	
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Grünhof	6-170	HaselHerz	9-118	Hikari Foods	
GRUPO IMEX Fruits and Seeds	2-411	Havelwasser -		HIKARI MISO	
Gruppo Mangiarsano		Rafael Kugel	9-373	Himstedt Felix (Honig Himstedt)	
Germinale	1-149	Hawo Fruits Spain	5-245	Hipp Organic Ingredients	
GUAYAPI	2-339	hawos Kormmühlen	6-130	HL Display	
GUSTI ITALIA	4-211	HDDES EXTRACTS	1-625	Hochschule für nachhaltige Entwicklung Eberswalde	
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GUTDING	9-636	HealthyCo	4-703	Hofpfisterrei, Ludwig Stocker	
Gutschermühle Traismauer	1-371	HEALY'S HONEY	4-141	Holderhof Deutschland	
Gyöngyösi és Társai	5-171	HEATH & HEATHER	4-341	Holland Paviljoen	5-31
<b>H</b>		Heider Druck	9-549	HOLLANDIA Karlovy Vary	
H. Schoppe & Schultz	9-330	Heil	6-376	Holle baby food	
H. Schulze Ladencafe	7-141	Heinrich Karow Nachf.	9-173		



1400 Independence Ave. SW  
Room 2648 - South, STOP 0268  
Washington, D.C. 20250

DATE: August 2, 2017

TO: Betsy Rakola  
Director, Compliance & Enforcement Division  
National Organic Program

FROM: Jennifer Tucker  
For Appeals Team  
National Organic Program

SUBJECT: Referral of Hakan Organics DMCC - APL-033-17, Appeal Denied

This matter is being referred for an administrative hearing concerning violations of the USDA organic regulations. On August 1, 2017, the National Organic Appeals Team received the enclosed Request for Hearing from John Fusion on behalf of Hakan Organics DMCC. This request is in response to the Administrator's Decision denying its appeal of a Proposed Revocation.

PURSUANT TO 7 C.F.R. §205.681(a)(2), once the Administrator denies an appeal a formal administrative proceeding pursuant to the U.S. Department of Agriculture's Uniform Rules of Practice may be initiated.

The NOP Appeals Team is respectfully referring this file to your team for future action. An acknowledgement of the hearing request has been sent to the appellant; it is attached for your reference.



1400 Independence Ave. SW  
Room 2648- South, STOP 0268  
Washington, D.C. 20250

August 2, 2017

John H. Fuson  
Crowell & Moring LLP  
1001 Pennsylvania Ave., NW  
Washington, DC 20004  
Transmittal by email: [jfuson@crowell.com](mailto:jfuson@crowell.com)

**RE: APL-033-17; Hearing Acknowledgement**

Dear Mr. Fuson:

This is to acknowledge that Hakan Organics DMCC's request for an administrative hearing was filed in a timely manner when it was received by the NOP Appeals Team on August 1, 2017. No further action is required on your part. You will be notified in writing by the USDA hearing clerk's office when the hearing is scheduled.

The hearing will be conducted pursuant to the USDA's Uniform Rules of Practice, 7 C.F.R. Part 1, Subpart H (<http://www.oaljdecisions.dm.usda.gov/rules>). The hearing will be held in the United States. Copies of the documents, exhibits and references available to the AMS Administrator during the appeal process will be made available to you once the hearing before the USDA Administrative Law Judge has been scheduled.

Please visit our website at: <http://www.ams.usda.gov/nop> for a copy of both the USDA organic regulations and the Organic Foods Production Act.

Sincerely,

A handwritten signature in dark ink that reads "Jennifer Tucker". The signature is written in a cursive, flowing style.

Jennifer Tucker  
Associate Deputy Administrator  
National Organic Program

Cc: Compliance and Enforcement Division

## Coffey, Danyele (CTR) - AMS

---

**From:** Fuson, John <JFuson@crowell.com>  
**Sent:** Tuesday, August 01, 2017 2:35 PM  
**To:** Tucker, Jennifer - AMS  
**Cc:** AMS - NOPAppeals; Bell, Lauren  
**Subject:** RE: Appeal Decision - Hakan Organics (APL-033-17)  
**Attachments:** 2017.08.01 Hakan Request for Hearing Cvr Ltr.pdf; 2017.08.01 Request for Hearing.PDF  
**Categories:** NOW

Dear Dr. Tucker,

Please see the enclosed cover letter and form requesting a hearing. A hard copy will be hand delivered to your office. If you have any questions concerning this request, please let me know.

With best regards,

John H. Fuson  
[jfuson@crowell.com](mailto:jfuson@crowell.com)  
Direct 1.202.624.2910 | Fax: 1.202.628.5116

**Crowell & Moring LLP** | [www.crowell.com](http://www.crowell.com)  
1001 Pennsylvania Avenue NW  
Washington, DC 20004

---

**From:** Tucker, Jennifer - AMS [mailto:Jennifer.Tucker@ams.usda.gov]  
**Sent:** Wednesday, July 5, 2017 2:36 PM  
**To:** Fuson, John  
**Subject:** Appeal Decision - Hakan Organics (APL-033-17)

Dear Mr. Fuson – Attached please find a cover letter, Appeal Decision from the AMS Administrator, and Hearing Forms, all pertaining to appeal APL-033-17 – Hakan Organics DMCC’s appeal of the April 28, 2017, Combined Notice of Noncompliance and Notice of Proposed Revocation received from the National Organic Program. If your client wishes to request or waive a Hearing, please complete the appropriate form attached and send to [NOPAppeals@ams.usda.gov](mailto:NOPAppeals@ams.usda.gov) or to me directly via reply email.

Thank you –  
Jenny Tucker

-----  
Jennifer Tucker, Ph.D.  
Associate Deputy Administrator  
USDA Agricultural Marketing Service  
National Organic Program  
Phone: (202) 720-3252  
[Jennifer.Tucker@ams.usda.gov](mailto:Jennifer.Tucker@ams.usda.gov)

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John H. Fuson  
(202) 624-2910  
JFuson@crowell.com

August 1, 2017

**BY EMAIL AND  
BY COURIER**

Jennifer Tucker, Ph.D.  
Associate Deputy Administrator  
USDA Agricultural Marketing Service  
National Organic Program  
1400 Independence Ave. SW  
Room 2648-S, STOP 0268  
Washington, D.C. 20250  
[Jennifer.Tucker@ams.usda.gov](mailto:Jennifer.Tucker@ams.usda.gov)

Re: APL-033-17; Request for Hearing

Dear Dr. Tucker:

I write on behalf of Hakan Organics DMCC to request a hearing on the Combined Notice of Noncompliance and Proposed Revocation issued by the U.S. Department of Agriculture (USDA), Agricultural Marketing Service (AMS), National Organic Program (NOP), and the subsequent Administrator's Decision, No. APL-033-17, dated July 5, 2017. Please find enclosed the Request for Hearing form, which I have signed on behalf of Hakan Organics DMCC.

Thank you for your continued time and attention to this matter. If you have any questions regarding this request, please do not hesitate to contact me.

Respectfully submitted,

(b) (6)

A large black rectangular redaction box covers the signature and name of the sender.

Enclosure

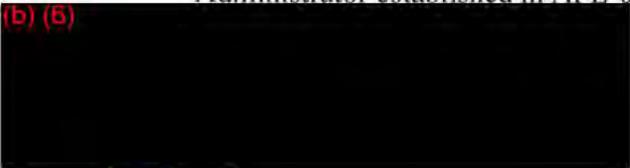
**Request for Hearing**

THIS REQUEST FOR HEARING is submitted by Hakan Organics DMCC to the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS).

In signing this Hearing Request, Hakan Organics DMCC acknowledges and agrees to the following:

1. The Secretary has jurisdiction in this matter.
2. Hakan Organics DMCC has been given the opportunity for a hearing and requests a hearing pursuant to the USDA's Uniform Rules of Practice, 7 C.F.R. Part 1, Subpart H.
3. Hakan Organics DMCC understands that failure to return this Hearing Request is deemed a waiver of hearing and in doing so, accepts the decision of the AMS Administrator established in APL-033-17.

(b) (6)



Date: 8/1/2007

DRAFT DELIBERATIVE

TO: Michael Sheats  
AMS Livestock, Poultry and Seed – Agricultural Analytics Division

FROM: Jennifer Tucker, National Organic Program

DATE: June 14, 2017

SUBJECT: Appeals Case Summary – Hakan Organics DMCC

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Please review the following case summary describing the Hakan Organics DMCC appeal of a Combined Notice of Noncompliance and Proposed Revocation issued by the National Organic Program (NOP). Because this is an appeal of an adverse action issued by the NOP, we are forwarding this summary to you for your review and recommendation.

**Summary of Facts**

1. Hakan Organics DMCC is a certified organic operation located in Dubai, United Arab Emirates. It is certified organic by USDA-accredited certifying agent Kiwa BCS Oko Garantie GmbH.
2. On April 28, 2017, the NOP issued Hakan Organics DMCC a Combined Notice of Noncompliance and Proposed Revocation. The adverse action was based on evidence that agents of Hakan Organics DMCC represented fumigated non-organic soybeans as organic for sale in the United States.
3. On May 30, 2017, Hakan Organics DMCC appealed the Notice; the appeal was accepted and was acknowledged on May 30, 2017.

**Summary of NOP Notice**

The NOP issued Hakan Organics DMCC (hereafter, Hakan Organics) a combined Notice of Noncompliance and Proposed Revocation (hereafter, Proposed Revocation). The Proposed Revocation was issued because Hakan, through its agents, represented fumigated, non-organic soybeans as organic for sale in the United States. These soybean shipments were managed by Hakan Organics, and two related entities: Beyaz Agro (Gazientep, Turkey) and Agropex (Broadway, Virginia).

The investigation that led to the Proposed Revocation relates to a shipment of 16,250 metric tons of soybeans, which arrived in the United States aboard the vessel M/V “Four Diamond” on November 12, 2016. The soybeans had been previously exported from Ukraine to Turkey and were then re-exported from Turkey to the United States. Before leaving Ukraine, the soybeans had been fumigated with aluminum phosphide, a prohibited substance under the USDA organic regulations. The NOP investigation revealed that Hakan Organics and its agent, Goksal Beyaz,

who serves as the General Coordinator<sup>1</sup> for Hakan Organics and who acted on its behalf, violated the OFPA by knowingly representing and selling the fumigated soybeans as organic.

The Proposed Revocation cited three specific violations.

1. **USDA organic regulations §205.272 (Commingling and contact with prohibited substance prevention practice standard).** Hakan Organics sold soybeans treated with prohibited substances as organic. Between March and October, 2016, Hakan Organics imported soybeans in bulk into Turkey from four exporters in Ukraine, as demonstrated in four Ukrainian phytosanitary certificates. These certificates show that the four shipments of soybeans were fumigated with aluminum phosphide, a prohibited substance under the USDA organic regulations. Hakan Organics was identified on the phytosanitary certificates as the consignee in Turkey, and therefore is a responsible, notified party. In preparation for re-export, the soybeans in bulk from the four shipments were consolidated under one phytosanitary certificate issued by Turkish authorities. The four loads of bulk soybeans were then consolidated and re-exported in a single shipment aboard the M/V “Four Diamond.”
2. **Organic Food Production Act (OFPA) 7 U.S. Code §6519(c)(2) (Recordkeeping, investigations, and enforcement).** In applying for an organic transaction certificate, Hakan Organics acted through its agents Goksal Beyaz and Beyaz Agro to present fraudulent information to a USDA-accredited organic certifying agent. On November 12, 2016, Beyaz Agro presented incomplete and false information to its organic certifying agent to obtain an organic transaction certificate for the load of fumigated soybeans to be shipped on M/V “Four Diamond.” Beyaz Agro emailed an application for the certificate to USDA-accredited certifying agent Kiwa-BCS and copied Goksal Beyaz and Hakan Organics Import/Export Specialist <sup>(b) (6)</sup> on the request. Beyaz Agro requested the organic transaction certificate to provide documentation of the organic status of the products.
3. **USDA organic regulations §205.100(c)(2) (What has to be certified) and §205.105(a) (Allowed and prohibited substances, methods, and ingredients in organic production and handling).** Beyaz Agro sold the non-organic, fumigated soybeans through Hakan Organics affiliate Agropex, to Global Natural. Soybeans from M/V “Four Diamond” were sold through Agropex as organic even though the soybeans were not produced or handled in compliance with the OFPA and its accompanying regulations. Agropex used the fraudulently obtained organic transaction certificates to subsequently identify the soybeans as organic and to store the soybeans as organic. Subsequently, Global Natural LLC, on behalf of Hakan Organics, Goksal Beyaz, Beyaz Agro, and Agropex, arranged for the sale of the non-organic soybeans to certified organic handlers in the United States.

### Appellant Perspective

In its appeal, Hakan Organics DMCC argues that the violations cited by the NOP were perpetrated by Beyaz Agro, an entirely distinct entity from Hakan Organics. The appeal states that Hakan Organics has no relationship with or control over Beyaz Agro, and Beyaz Agro is not

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<sup>1</sup> As evidenced by business cards provided by the Hakan Organics DMCC booth to USDA NOP personnel at the BioFach trade show in Nuremberg, Germany in February 2017

DRAFT DELIBERATIVE

authorized to act as an agent for Hakan Organics. In February 2014, Hakan Organics entered into an agreement with Goksal Beyaz, a Turkish citizen, to open a Hakan Organics satellite operation in Turkey. Hakan Organics' appeal notes that the "agreement with Mr. Beyaz entrusted him to execute certain transactions on behalf of Hakan Organics in Turkey." The Hakan Organics appeal acknowledges, "Unfortunately, as evidenced by the allegations in the Notice and findings made during Hakan Organics' internal investigation into those allegations, that trust was grossly misplaced. On April 28, 2017, immediately upon learning of the misconduct alleged in the Notice, Hakan Organics terminated its relationship with Mr. Beyaz."

The appeal notes that Mr. Beyaz operated his own business called Beyaz Agro, which held separate USDA organic certifications as an organic handler. The appeal highlights that many allegations in the Proposed Revocation refer to specific actions taken by Beyaz Agro, not directly by Hakan Organics. Hakan Organics states that it can neither confirm nor deny the alleged misconduct by Beyaz Agro as it has no insight into or control over actions it took.

In its appeal, Hakan Organics also notes that it cannot confirm what information was communicated to (b) (6), identified in the Proposed Revocation as a Hakan Organics' "Import/Export Specialist." (b) (6) is not an employee of Hakan Organics. Hakan Organics assumes that he is a Beyaz Agro employee, as Mr. Beyaz admitted to Hakan Organics that his employees were responsible for the misconduct. Mr. Beyaz was authorized to establish e-mail accounts under the hakanfoods domain name for use by the Turkish operation, but (b) (6) was not an employee or agent of Hakan Organics. No one shared with Hakan Organics any notice or documentation about any shipments that would indicate Beyaz Agro was falsely representing them to be organic.

Specifically, Hakan Organics responds to the violations in the Proposed Revocation as follows:

1. Hakan Organics denies causing organic products to come into contact with prohibited substances or selling treated soybeans as organic. Beyaz Agro, not Hakan Organics, was the entity that obtained certificates and re-exported the soybeans.
2. Hakan Organics denies that Beyaz Agro was an agent authorized to act on its behalf. Any action Mr. Beyaz took on behalf of Beyaz Agro, was similarly not authorized by Hakan Organics. Beyaz Agro was not authorized to act for Hakan Organics, and therefore could not be its agent for any transactions. Any unlawful actions described in the Notice that were taken by Mr. Beyaz were on behalf of Beyaz Agro, not Hakan Organics.
3. Again, Hakan Organics denies that Beyaz Agro was its agent, and thus Beyaz Agro's alleged misconduct should not be imputed to Hakan Organics. Beyaz Agro is not authorized to act on behalf of Hakan Organics. It is a separately certified organic handler and its actions cannot and should not be imputed to Hakan Organics.

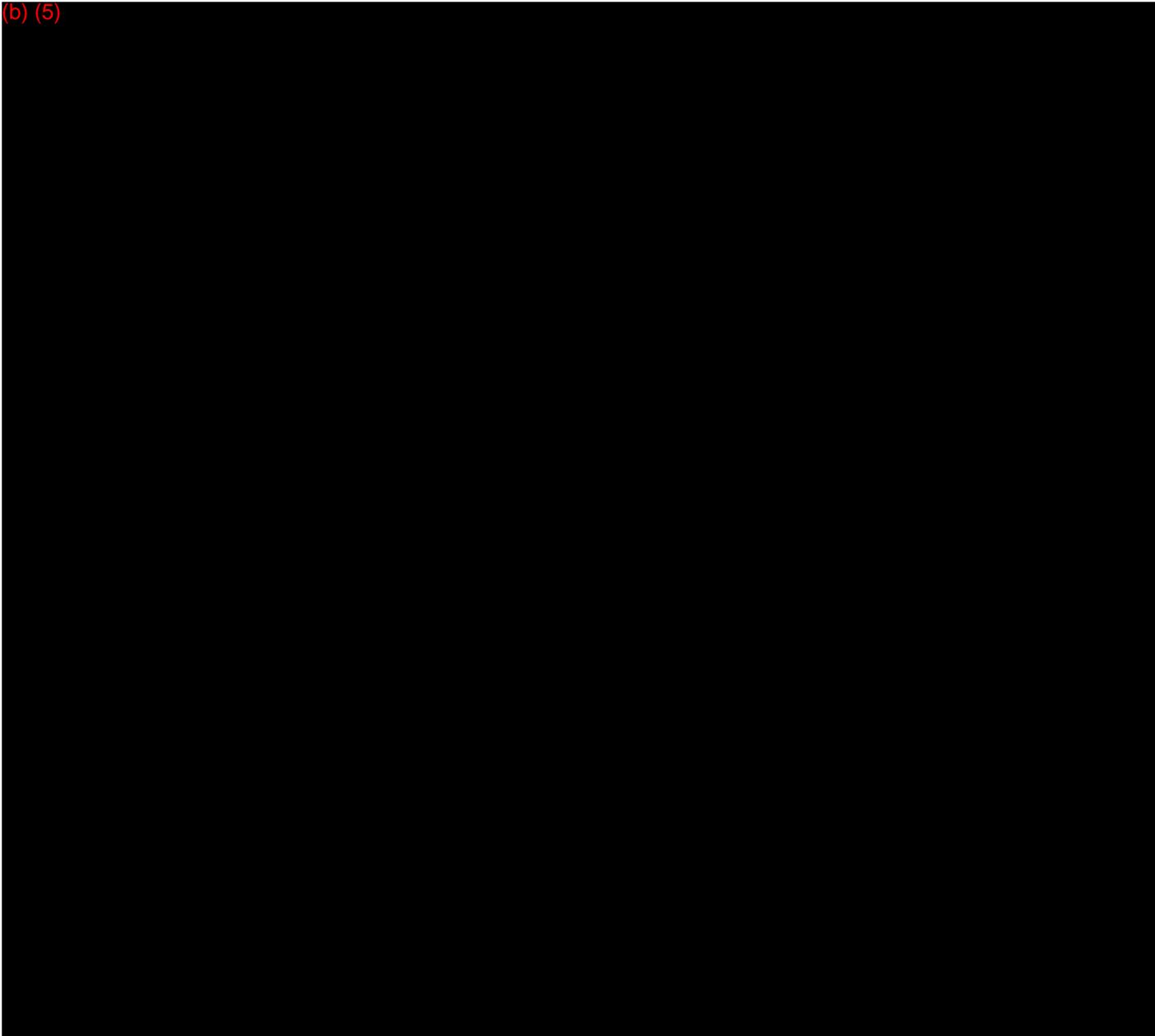
Hakan Organics notes that while Hakan Organics partnered with Mr. Beyaz to open satellite operations in Turkey and granted Mr. Beyaz authority to take certain actions on its behalf, it had no such agreement with Beyaz Agro. The appeal notes that when Hakan Organics confronted

Mr. Beyaz about the allegations, Mr. Beyaz admitted his responsibility for the actions of Beyaz Agro, which were outside the authority granted by Hakan Organics.

Hakan Organics closes its appeal by stating that it understands its responsibilities as a certified organic operation and is troubled that its name and reputation may have been misused by a rogue actor to represent conventional crops as organic. It has reviewed its internal controls and external partners to ensure that Hakan Organics and all individuals it works with comply with all applicable laws. The appeal closes with, “Hakan Organics is not Beyaz Agro, and despite the unfortunate and now terminated relationship with Mr. Beyaz, that USDA cannot and should not revoke Hakan Organics’ organic certification on account of Beyaz Agro’s misconduct.”

**NOP Perspective**

(b) (5)



(b) (5)





**Agricultural  
Marketing  
Service**

1400 Independence Avenue, S.W.  
Room 2648-S, STOP 0268  
Washington, D.C. 20250-0268

**COMBINED NOTICE OF NON-COMPLIANCE AND  
PROPOSED REVOCATION OF CERTIFICATION**

April 28, 2017

**Via Registered Email**

Hakan Bahceci, CEO  
Hakan Organics DMCC  
34<sup>th</sup> Floor, Tower BB2 Mazaya Business Avenue  
Jemeirah Lakes Towers (JLT), Sheikh Zayed Rd.  
PO Box 31489  
Dubai, UNITED ARAB EMIRATES  
[Hakan.Bahceci@hakanfoods.com](mailto:Hakan.Bahceci@hakanfoods.com)

Dear Mr. Bahceci:

The United States Department of Agriculture National Organic Program (NOP) enforces the Organic Foods Production Act of 1990, as amended (7 U.S.C. §§ 6501-6522) (OFPA), and its implementing regulations at 7 C.F.R. § 205 et seq. Section 2106(a)(1)(B) of the OFPA (7 U.S.C. § 6505(a)(1)(B)) states that “no person may affix a label to, or provide other market information concerning, an agricultural product if such label or information implies, directly or indirectly, that such product is produced or handled using organic methods, except in accordance with [the OFPA].” The OFPA further requires that, to be sold or labeled as organic, an agricultural product must be produced only on certified organic farms. In addition, section 205.105(a) of the USDA organic regulations (7 C.F.R. § 205.105(a)) states that products sold as organic must be produced and handled without the use of synthetic substances prohibited by the regulations. Finally, section 205.100(c) of the USDA organic regulations (7 C.F.R. § 205.100(c)) provides that any operation that knowingly sells or labels a product as organic, except in accordance with the OFPA, shall be subject to a civil penalty of \$11,000 for each violation.

**PROPOSED REVOCATION OF ORGANIC CERTIFICATION**

Section 205.660 of the USDA organic regulations (7 C.F.R. § 205.660) provides that the NOP may initiate suspension or revocation proceedings against a certified operation when the Program Manager has reason to believe that a certified operation has violated or is not in compliance with the OFPA or its accompanying regulations. Hakan Organics DMCC (Hakan Organics) is a certified organic operation, and therefore is in full knowledge of the requirements of the USDA organic regulations. The actions of Hakan Organics, through its agents Goksal Beyaz at Beyaz Agro and through Agropex International (Agropex), to represent fumigated, non-organic

soybeans as organic for sale in the United States are knowing and willful violations of the USDA organic regulations.

The NOP proposes to revoke the eligibility for organic certification of Hakan Organics DMCC and all responsibly connected parties, effective 30 days from receipt of this letter. Revocation would apply to Hakan Organics and all of its responsibly connected persons, including any other person who is a partner, officer, director, holder, manager or owner of 10 percent or more of the voting stock of Hakan Organics. If the NOP revokes Hakan Organics's organic certification, you shall be directed to cease and desist all sale and handling of its products that are represented as organic.

### **COMPLAINTS**

The NOP received complaints that non-organic grains and oilseeds are being imported from Turkey and fraudulently sold as organic in the United States. In the course of investigating these complaints, the NOP identified violations of the USDA organic regulations involving soybean shipments managed by Hakan Organics, a certified organic grain and oilseed handling operation, and two related entities: Beyaz Agro, based in Gazientep, Turkey and Agropex, Broadway, Virginia. This investigation relates to a shipment of 16,250 metric tons of soybeans, which arrived in the United States aboard the M/V "Four Diamond" on November 12, 2016. The soybeans had been previously exported from Ukraine to Turkey and were then re-exported from Turkey to the United States. However, before leaving Ukraine, the soybeans had been fumigated with aluminum phosphide. Aluminum phosphide is a prohibited substance under the USDA organic regulations. Upon arrival in the United States, the fumigated soybeans were sold as USDA organic. This action violates the OFPA and the USDA organic regulations.

### **USDA NATIONAL ORGANIC PROGRAM INVESTIGATIVE FINDINGS**

The NOP investigation revealed that Hakan Organics and its agent, Goksal Beyaz, who serves as the General Coordinator<sup>1</sup> for Hakan Organics, acting on its behalf, violated the OFPA by selling fumigated soybeans from Ukraine in the United States while representing them as organically produced and handled.

Hakan Organics, headquartered in the United Arab Emirates, imported four shipments of soybeans from Ukraine to Turkey under four phytosanitary certificates issued by the State Veterinary and Phytosanitary Service of Ukraine. These phytosanitary certificates do not indicate that the soybeans were organically produced, but they do show that the soybeans were fumigated with aluminum phosphide prior to entering Turkey. Hakan Organics stored the soybeans at its warehouses in Turkey and the four shipments of soybeans were consolidated into a single shipment, under a single Turkish phytosanitary certificate, that referenced the original four Ukrainian phytosanitary certificates.

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<sup>1</sup> As evidenced by business cards provided by the Hakan Organics DMCC booth to USDA NOP personnel at the BioFach trade show in Nuremberg, Germany in February 2017

Beyaz Agro, in Turkey, applied to accredited certifying agent Kiwa-BCS for organic transaction certificates. However, Beyaz Agro gave Kiwa-BCS false information about the soybeans. Specifically, it provided two certificates of inspection that were issued by bio.Inspecta AG, a USDA-accredited certifier, which identified Russia as the country of dispatch for 26,243,840 KG of organic soybeans. The application for an organic transaction certificate also included commercial invoices, bills of lading, and marine survey certificates that identify 16,250,000 KG of organic soybeans in bulk to be shipped to the United States in three holds aboard the vessel M/V Four Diamond. Beyaz Agro copied Goksal Beyaz and Hakan Organics Import/Export Specialist (b) (6) on the application request. Based on this false information, Kiwa-BCS issued Beyaz Agro three organic transaction certificates, which listed the soybeans as organic. Beyaz Agro used these certificates to re-export the Ukrainian soybeans to the United States as organic soybeans.

Beyaz Agro nominally sold the soybeans to Hakan Organics affiliate Agropex and gave it the three organic transaction certificates issued by Kiwa-BCS. It also gave Agropex copies of the same commercial invoices, bills of lading, and marine survey certificates that it used in the application to Kiwa-BCS, but this version of the documents, identified the soybeans as non-GMO not organic. The soybeans were shipped to the United States on the M/V Four Diamond. Agropex stored the soybeans with (b) (4) in Stockton, CA, a certified organic handler. Agropex represented to sales agent Global Natural LLC that the soybeans were organic. Under a contract with Hakan Organics and signed by Goksal Beyaz, Global Natural arranged the sale of the soybeans to certified organic handlers in the United States or (b) (4) (US Dollars).

NOP investigators subsequently obtained the commercial invoices, bills of lading, and marine survey certificates associated with these soybeans from Agropex and found discrepancies between Agropex's documents and those that Beyaz Agro provided to Kiwa-BCS, suggesting that these documents had been altered.

Through the phytosanitary certificates issued by Ukraine and Turkish authorities, the records of the certifying agent, and the records of Agropex, the NOP was able to positively trace the fumigated soybeans, which Agropex sold and represented as organic in the United States, to the fumigated soybeans purchased by Hakan Organics in Ukraine and re-exported through Turkey.

### **VIOLATIONS OF THE OFPA AND USDA ORGANIC REGULATIONS**

Details of the regulatory violations are as follows.

1. Hakan Organics, sold soybeans treated with prohibited substances as organic, in violation of 7 C.F.R. § 205.272.

*7 C.F.R. §205.272: The handler of an organic handling operation must implement measures necessary to ... protect organic products from contact with prohibited substances.*

Between March and October, 2016, Hakan Organics imported soybeans in bulk into Turkey from four exporters in Ukraine, as demonstrated in four Ukrainian phytosanitary certificates: 75/15-036/BX-500973 (31 March 2016); 75/14-040/BX-083763 (08 May 2016); 75/15-010/BX-468423 (04 May 2016); and 60/15-6054/XX-181135 (08 October 2016). The Ukrainian phytosanitary certificates show that each of the four shipments of soybeans was fumigated with aluminum phosphide, a prohibited substance under the USDA organic regulations. The phytosanitary certificates clearly identified Ukraine as the country of origin for the soybeans. Hakan Organics was identified on the phytosanitary certificates as the consignee in Turkey and therefore is a responsible, notified party.

In preparation for re-export, the soybeans in bulk from the four shipments were consolidated under one phytosanitary certificate issued by the Turkish authorities, No: EC/TR B 0140061 dated October 27, 2016. Block 10 of Turkish certificate EC/TR B 0140061 referenced the four phytosanitary certificates issued by Ukraine. The four loads of bulk soybeans were then consolidated and re-exported in a single shipment aboard bulk carrier M/V "Four Diamond" in Holds 1, 3, and 5. The soybeans in each hold were shipped under phytosanitary certificates, No: 0140369, No: 0140368, and No: 0140367 respectively. Each of these phytosanitary certificates had an attachment that linked the certificate to the preceding certificate "This phytosanitary certificate is issued instead of phytosanitary certificate No: EC/TR B 0140061." The Turkish Ministry of Food, Agriculture, and Livestock has confirmed that the Ukrainian phytosanitary certificates are for the same loads of soybeans as the Turkish certificates. The State Services of Ukraine on Food Safety and Consumer Protection has confirmed it issued the four Ukraine phytosanitary certificates and that the certificates are valid.

2. In applying for an organic transaction certificate, Hakan Organics acted through its agents Goksal Beyaz and Beyaz Agro to present fraudulent information to an organic certifying agent of the USDA Secretary of Agriculture, in violation of section 2120 of the OFPA (7 U.S.C. § 6519(c)(2)).

*7 U.S.C. § 6519(c)(2): Any operation that makes a false statement under this chapter to the Secretary, a governing State official, or a certifying agent shall be punished in accordance with section 1001 of title 18.*

On November 12, 2016, Beyaz Agro, presented incomplete and false information to its organic certifying agent to obtain an organic transaction certificate for the load of fumigated Ukrainian soybeans to be shipped on M/V "Four Diamond." Beyaz Agro emailed an application for the certificate to USDA-accredited certifying agent Kiwa-BCS and copied Goksal Beyaz and Hakan Organics Import/Export Specialist (b) (6) on the request. Beyaz Agro requested the organic transaction certificate in order to provide documentation of the organic status of products for shipment to and sale in the United States. The application included two certificates (HR-023-16 and HR-024-16) of inspection for import of products from organic production that were issued by bio.Inspecta AG, a USDA-accredited certifier, which identified Russia as the country of dispatch for (b) (4) of organic soybeans.

The transaction certificate application also included commercial invoices, bills of lading, and marine survey certificates that identify 16,250,000 KG of organic soybeans in bulk to be shipped to the United States in three holds aboard the vessel M/V Four Diamond. The marine survey certificates sent to Kiwa-BCS in the application state: "organic soybeans" and had a "Farmer Code (Lot number) HRU-001, HRU-002", which matched the inventory records showing the false Russian origin in the transaction certificate request. However, the commercial invoices and bills of lading from Beyaz Agro to Kiwa-BCS were different from those observed by NOP personnel during a visit to Agropex on March 16, 2017. The invoices observed at Agropex listed the product as "non-GMO soybeans."

When applying to Kiwa-BCS, Beyaz Agro omitted any documents that would indicate "Ukraine" as the true country of origin of the soybeans, such as the Certificate of Origin or the Phytosanitary Certificate. Providing such information may have alerted Kiwa-BCS to the possibility that the soybeans may have been fumigated and thereby ineligible for organic certification. Instead, Beyaz Agro presented certification documents indicating the soybeans had been sourced from Russia.

On November 15, 2016, Kiwa-BCS issued Beyaz Agro three organic transaction certificates (DE-25457-25, 26, and 27) based on the application.

3. Beyaz Agro sold the non-organic, fumigated soybeans through Hakan Organics affiliate Agropex, to Global Natural in violation of both 7 C.F.R. § 205.100(c)(2) and 7 C.F.R. § 205.105 (a).

*7 C.F.R. §205.100(c)(1): Any operation that: (1) Knowingly sells or labels a product as organic, except in accordance with the Act, shall be subject to a civil penalty of not more than the amount specified in § 3.91(b)(1) of this title per violation.; and*

*7 C.F.R. §205.105 (a): To be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," the product must be produced and handled without the use of synthetic substances and ingredients, except as provided in §205.601 or §205.603.*

Beyaz Agro provided Agropex commercial invoices, bills of lading, and marine survey certificates that identified the soybeans as non-GMO but did not identify the soybeans as organic. They also provided the fraudulently obtained organic transaction certificates issued by Kiwa-BCS to represent the soybeans as certified organic. Soybeans from M/V "Four Diamond" were sold through Agropex as organic even though the soybeans were not produced or handled in compliance with the OFPA and its accompanying regulations.

Agropex used the fraudulently obtained organic transaction certificates to subsequently identify the soybeans as organic and to store the soybeans as organic at certified organic handler (b) (4) Stockton, California. Subsequently, Global Natural LLC, on behalf of Hakan Organics, Goksal Beyaz, Beyaz Aggro, and Agropex, arranged for the sale of the non-organic soybeans to certified organic handlers in the United States.

**RIGHT TO APPEAL**

Pursuant to section 205.681 of the USDA organic regulations (7 C.F.R. § 205.681), you have the right to file an appeal of these proposed actions within 30 days of receipt of this letter. Appeals must be filed in writing to:

Administrator, USDA, AMS  
c/o NOP Appeals Staff  
1400 Independence Avenue, SW  
Room 2095-S, STOP 0203  
Washington, DC 20250

Your appeal must include a copy of the adverse decision and a statement of your reasons for believing that the decision was not proper or made in accordance with applicable program regulations, policies, or procedures.

If you have questions regarding this proposed action, please contact Betsy Rakola, Director, NOP Compliance and Enforcement Division at (202) 720-3252 or [Betsy.Rakola@ams.usda.gov](mailto:Betsy.Rakola@ams.usda.gov).

Sincerely,



Miles V. McEvoy  
Deputy Administrator  
National Organic Program

cc: NOP Accreditation and International Activities Division -  
[NOPACAAverseActions@ams.usda.gov](mailto:NOPACAAverseActions@ams.usda.gov)  
Tobias Fischer – KIWA-BCS, [Tobias.Fischer@bcs-oeko.de](mailto:Tobias.Fischer@bcs-oeko.de)