**EXH-18** 

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Mr. Henry Paulson, Jr.
Secretary of Treasury
Department of the Treasury
1500 Pennsylvania Ave., N.W.
Washington, D.C. 20220

Re: Richard Chichskli, FAC No. LB-273016

Dear Mr. Paulson:

I represent Richard Chichakli and have a license from the Treasury Department to do so. I am asking that you personally examine this case in that I feel that the blocking of Mr. Chichakli's assets and his effective exile was and is completely overreaching by the Treasury Department.

Executive Order No. 13348 of July 22, 2004, was an order blocking property of certain persons and prohibiting the importation of timber from Liberia. Mr. Chichakli fell victim to that order although he is not listed in the order as an affected person. This order sets forth that there was an "unlawful depletion of Liberian resources - - - that have undermined Liberia's transition to democracy - - - that the comprehensive peace agreement signed on August 18, 2003, and the related cease fire have not yet been universally implemented throughout Liberia and that the illicit trade in round logs and timber products is linked to the proliferation and trafficking in illegal arms."

It appears to me that the basis of the presidential order exists no longer and my client could not be involved in that (1) the democracy of Liberia elected a new president in 2005; (2) the President immediately stopped the illegal cutting of timber; (3) ex-Liberian President Charles Taylor has been imprisoned for quite some time and is awaiting trial for his actions.

Mr. Chichakli was a practicing CPA here, an American citizen, decorated Gulf War veteran and married with two children. The Treasury stated to me that Mr. Chichakli's CPA practice was a front and he was actually the chief financial officer of Victor Bout, an alleged Russian trading in illegal arms and selling to Charles Taylor. When in fact, he was not the financial officer of Mr. Bout, his CPA practice was not a front and the Treasury found that to be true when they came to disburse his files to his clients after closing his office and disconnecting his phones. They discovered that he had

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over 500 client files to be distributed and they were not up to the task. Is this "blocking?"

They not only destroyed his business, but wrote the licensing authority in Texas to revoke his accounting license. Is this "blocking?"

Not being allowed to receive money from anyone, Mr. Chichakli moved to Russia. If the Treasury has made the investigation that they say they have, they should know that he was not and has not been on Mr. Bout's payroll in any capacity. He lives in Russia and is still not employed by Mr. Bout in any manner. It appears that Mr. Chichakli is supposed to fit under Section 1(a)(ii)(C) of the order, which is directed toward a person materially assisting, sponsoring, providing financial material or technical support for goods or services in support of the unlawful depletion of Liberian resources. It does not fit in that he was a practicing CPA and a teacher at a local college, and before that a student. Mr. Chichakli was not blocked until April 26, 2005. Consideration should have been taken as to the time of the alleged actions of Mr. Bout, the time of the presidential order, and what Mr. Chichakli was doing at all times.

The Treasury has destroyed this man and because of the Treasury's lack of final determination after fourteen months, he has been unable to seek legal redress.

I have been practicing law for almost 50 years and have never seen anything as unjustified as this situation. Mr. Chichakli is not a terrorist and has not been accused as such. It would appear that the method of destroying him by (1) the destruction of his business, (2) seizure of his property, and I do not mean his money accounts; (3) disallowing from his funds the payment of taxes and condominium fees; and (4) denying rental of three properties that are now vacant, is overreaching and not a part of "blocking."

The Treasury's backup, so-called evidence, is nothing more than hearsay from the internet. They condemn him because he knew Bin Laden in college and his uncle was president of Syria in the early 1950's, when Mr. Chichakli was not born until 1957.

I would sincerely appreciate your help in this matter. Mr. Chichakli was a good. American.

FOURTEEN MONTHS AND NO ANSWERS. PLEASE DO SOMETHING NOW.

Very truly yours

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Via Facsimile (202) 622-1657 and U.S. Mail