

Brian Mosallam, QPFC  
Financial Consultant



June 6, 2012

Ms. Josephine Arnold  
Chief Counsel, Minority Business Development Agency  
Department of Commerce  
1401 Constitution Avenue, NW, Room 5093  
Washington, DC 20230

***Docket No. 120517080-2080-01***

Dear Ms. Arnold,

I was recently notified that the Department of Commerce has undertaken a petition for inclusion of the Arab-American community in the groups eligible for Minority Business Development Agency (MBDA) services. This letter is in support of the American-Arab Anti-Discrimination Committee's (ADC) petition.

I believe that Arab Americans fall within a formal designation as a minority. In order to characterize a community within the MBDA's minority status, the community must prove it is a socially and economically disadvantaged minority group. The usefulness and benefits of a minority designation would be of tremendous help to the Arab American community.

Pursuant to Executive Order 11625, the MBDA funds business centers that provide business development services to businesses that are owned and controlled by individuals who fall within a designated socially or economically disadvantaged group. The agencies assistance and the ability to apply for minority centered grants would materially change the lives of small business owners. From being able to purchase a suitable and sustainable office building to emotionally feeling the support of the government, the designation would allow small business owners around the United States to expand their ventures and businesses.

Arab Americans are socially and economically disadvantaged and have been since their initial arrival to the United States. As ADC stated, beginning in the late 1800s and escalating in the 1910s when certain immigrant communities from Arab countries were capped at entering the United States, the discrimination Arab Americans have faced in the United States is longstanding and pervasive. Disadvantages associated with being Arab American have persisted in the United States and continue to worsen post-9/11.

The named individual offers securities and investment advisory services through AXA Advisors, LLC (NY, NY 212-314-4600), member FINRA, SIPC, and offers annuity and insurance products through AXA Network, LLC and its subsidiaries.

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brian.mosallam@axa-advisors.com



www.brianmosallam.com

**Brian Mosallam, QPFC**  
Financial Consultant



As a financial advisor, I have witnessed first hand how discrimination can impact ones business. This discrimination has affected many business owners in the Arab-American community, both economically and socially.

If granted the designation, the MBDA programs will help Arab Americans overcome the hardships that discrimination and prejudice has placed upon us as business owners. I kindly urge the Department of Commerce to designate Arab Americans as a minority that qualifies for MBDA services and support.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Mosallam".

Brian Mosallam  
Financial Consultant

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June 6, 2012

**G. H. Alwan**  
Retirement Benefits Specialist  
Tax Sheltered Plans

**Retirement Benefits Group**

Ms. Josephine Arnold  
Chief Counsel, Minority Business Development Agency  
Department of Commerce  
1401 Constitution Avenue, NW, Room 5093  
Washington, DC 20230

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**Retirement Benefits Group**, a specialized division of **AXA Advisors, LLC**  
24440 Fairmount Dr, Dearborn, MI 48124

Tel: (313) 506-0456 Fax: (248) 641-2788 [gehad.alwan@axa-advisors.com](mailto:gehad.alwan@axa-advisors.com)

The named individual offers securities through AXA Advisors, LLC (NY, NY 212-314-4600), member FINRA, SIPC, and as an agent of AXA Network, LLC and its subsidiaries offers annuity and insurance products of affiliate, AXA Equitable Life Insurance Company (NY, NY 10104), and unaffiliated insurance companies.



**G. H. Alwan**  
Retirement Benefits Specialist  
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Sincerely,

A handwritten signature in blue ink, appearing to read 'Gehad Alwan', written over a light blue horizontal line.

Gehad Alwan  
Retirement Benefits Specialist

**Retirement Benefits Group**, a specialized division of **AXA Advisors, LLC**  
24440 Fairmount Dr., Dearborn, MI 48124

Tel: (313) 506-0456 Fax: (248) 641-2788 [gehad.alwan@axa-advisors.com](mailto:gehad.alwan@axa-advisors.com)

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June 6, 2012

Via Electronic Mail to

Ms. Josephine Arnold  
Chief Counsel - Minority Business Development Agency  
Department of Commerce  
1401 Constitution Avenue NW., Room 5093  
Washington, DC 20230

**Docket No. 120517080-2080-01**

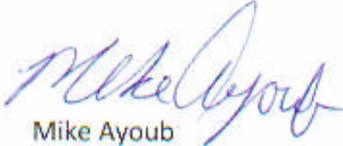
Dear, Ms Arnold

I am writing this letter in support of the petition filed by the American-Arab Anti-Discrimination Committee (ADC), requesting that the Arab-American community be designated as a "disadvantaged minority." Over the course of the past decade members of the Arab American community have faced discrimination in many forms. The result of this discrimination, as is indicated in the brief filed by ADC, has led many Arab American business owners to struggle financially.

Many Arab-Americans in the Real Estate Market can attest to the findings by ADC. As a result of anti-Arab sentiment, many realtors of Arab heritage have found themselves isolated in markets consisting of heavy Arab-American concentration. Many professionals in the field found it extremely difficult to gain employment outside of markets with high Arab concentration – this limits the potential for growth in the field and implements a glass ceiling for professional and career development.

I urge you to approve the petition filed by ADC. This will provide much needed assistance and benefits to many in the community who are struggling as a result of discrimination. The members of the Arab American community are hardworking individuals, who for decades have been part of the social fabric of the United States. The granting of this petition will ensure that the community as a whole can overcome the impact of the discriminatory policies and actions that have been facing the community for decades.

Thank you for your consideration and we look forward to a favorable decision,

  
Mike Ayoub

RE/MAX Team 2000  
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Office: (313) 561-0900  
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**Imad Hamad**, Senior National Advisor,  
Regional Director



**National Office**

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Washington, DC 20007  
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June 6, 2012

Via Electronic Mail to [AACComments@mbda.gov](mailto:AACComments@mbda.gov)

Ms. Josephine Arnold  
Chief Counsel, Minority Business Development Agency  
Department of Commerce  
1401 Constitution Avenue, NW, Room 5093  
Washington, DC 20230

**Docket No. 120517080-2080-01**

Dear Ms. Arnold,

On behalf of the American-Arab Anti-Discrimination Committee – Michigan office (ADC-MI), I am writing to support the petition filed by the National office of the ADC, requesting disadvantaged minority status for the Arab-American community. The ADC-MI office is based in Dearborn, Michigan, home of the largest concentration of Arab Americans in the country. Over the course of the past two decades the ADC-MI office has witnessed the direct impact discrimination can have on the business community, and the limitations it imposes on all community members.

The petition outlines the problems facing the community, with an emphasis on the past decade. Also true is that the community has been facing discrimination for a period prior to 2001, which is also described in the brief. The culmination of discrimination has led to many Arab Americans feeling a direct economic and social impact. One such example could be found in the impact employment discrimination has had on community members. As a result of employment discrimination, community members are forced out of the general workforce, and into finding their own opportunities within the city of Dearborn.

Service providers and professionals, such as real estate agents and doctors, have been forced to business opportunities within areas of high Arab American concentrations. The ADC-MI office has handled thousands of cases of discrimination since 9/11 and many of those cases involve business owners being forced to close their practice and move into or closer to Dearborn, the reason is simple – non-Arab community members did not feel comfortable using the services of an Arab American.

Granting the petition will provide the support Arab American business owners need to be successful. By approving the petition the Department of Commerce will play a major and positive role in providing community members the tools needed to overcome discrimination and its impact.

Truly yours,

  
Imad Hamad  
Regional Director and Senior National Advisor  
ADC Michigan





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June 6, 2012

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Chief Counsel, Minority Business Development Agency  
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1401 Constitution Avenue, NW, Room 5093  
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**Docket No. 120517080-2080-01**

Dear Ms. Arnold,

I am writing this letter in support of the petition filed by the American-Arab Anti-Discrimination Committee (A.D.C.), seeking the designation of the Arab American community as a "disadvantaged minority". A formal designation will allow Arab Americans throughout the United States to receive assistance from Minority Business Development Agency (M.B.D.A.) funded programs.

A.D.C. maintains that, pursuant to E.O. 11625 and 15 CFR Part 1400, Arab Americans are socially and economically disadvantaged. If formally designated as socially and economically disadvantaged, the community will be provided the benefits the M.B.D.A. offers to minority owned and operated businesses. Beginning in the late 1800s and escalating in the 1910s when certain immigrant communities from Arab countries were capped at entering the United States, the discrimination Arab Americans have faced in the United States is longstanding and pervasive. Disadvantages associated with being Arab American have persisted in the United States and continue to worsen post-9/11.

There are designated "Minority Businesses" with populations in the tens of millions that are recognized as minority businesses. The Arab American community in totality is less than 7 million. The Arab American business community most likely is only in the thousands, which is far smaller than any other designated minority business community.

Midamar Corporation has been in business since 1975 and has been recognized by both the State of Iowa and federal government with various business accomplishments. With that said, Midamar's business has been restricted in competing in not only U.S. government contracts and provisioning but has also been denied minority business opportunities to State and Federal institutions. As a domestic and international supply chain company, we are working to meet the Administration's mandate of doubling exports within the five year period previously designated. Again, Midamar not being a minority designated company, has not had the designation to source and supply from major U.S. corporations to export more U.S.A. products. This is a fact. Midamar's exports representing USA quality products would be greatly enhanced with a status of "Minority Business Ownership".



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The Arab American community has been affected economically. During the past decade, which was not previously manifested, some U.S.A. companies have expressed concern with working with a company exporting to growing G.C.C. and North African markets because of close bonds with Arab Americans because of F.B.I. or C.I.A. involvement. This has prevented partnerships with some businesses and business relationships from forming. This creates an atmosphere in which Arab American businesses are sometimes limiting their ability to expand their businesses.

Within the last decade and more, there has been an influx of immigrants from the Arab region who are trying to develop new small businesses in the food and transportation sectors. With the assistance of benefits being opened up as “Minority Businesses” just as other minority communities with millions of citizens, this new small minority will help foster economic growth domestically, which is needed for job creation.

In closing, I would like to point out we receive the publication M.B.E., Minority Business Entrepreneur. With the Arab American community being far smaller than the Asian, Hispanic, African American communities designated as Minority Businesses, why has there never been an Arab American on the front of M.B.E.? Often it is disappointing, discouraging to see the contents featured which could have application and open up opportunities for business development for the greater benefit of job creation if Arab Americans were given the same designation with race, gender, and ethnicity as the currently designated “Minority” groups. Granting “Business Minority” status to the Arab American business community will not negatively affect our society or economy. It will only enhance business development without giving privilege or priority over any other sector of our society and economy.

If granted the designation, the M.B.D.A. programs will help both existing and new Arab Americans entrepreneurs overcome the barriers that have limited their business opportunities. I urge you to approve the petition filed by A.D.C..

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Ba', is positioned above the typed name.

Bill Aossey, Sr.  
Senior Director

## Submission #421

Published on MBDA Web Portal (<http://www.mbda.gov>)

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## Submission #421

Submission information

Form: [Petition for Inclusion of the Arab-American Community in the Groups Eligible for MBDA Services](#)

Submitted by Guest (not verified)

Monday June 4th, 2012 2:09PM

74.88.16.9

Name: Maureen McCormack

Company/Organization Name:

Email Address: Lovetoreadalways@gmail.com

Comment: We can NOT afford another minority group being labeled a privileged class who can now receive subsidies. They have every advantage that any other immigrant or citizen has. If they are different, then why not Irish-Americans, or Mongolian-Americans, or Tanzanian-Americans? This is absurd!!! It is using the system as if it were already socialist. Maybe it is.

Upload File(s) Optional:

**Source URL (retrieved on 06/11/2012 - 1:38pm):**

<http://www.mbda.gov/node/1475/submission/421>

## Submission #424

Published on MBDA Web Portal (<http://www.mbda.gov>)

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## Submission #424

Submission information

Form: [Petition for Inclusion of the Arab-American Community in the Groups Eligible for MBDA Services](#)

Submitted by Guest (not verified)

Wednesday June 6th, 2012 3:01PM

68.33.223.103

Name: Darlene Hider

Company/Organization Name: Hider Family Dentistry

Email Address:

Comment: I commend the Department of Commerce and the MBDA for taking up this petition. It is our hope that the ADC petition is approved. The discrimination faced by the Arab American community has led to a number of businesses being forced out of non-Arab a neighborhood, denial of loans/funding, and other negative impacts. The stories are real and very common - Arab Americans are not able to penetrate markets outside of predominately concentrated enclaves such as Dearborn, MI, or Patterson, NJ. Doctors, such as my very own family members, began losing patients shortly after 9/11, and within a matter of a few months there was a complete shutdown of business, and if lucky enough relocation to Dearborn --- closer to the community.

Approval of this notice will have great benefits. We are all encouraged that MBDA has taken this step and we look forward to assistance that will help us overcome the impact discrimination has had on our community.

Upload File(s) Optional:

**Source URL (retrieved on 06/11/2012 - 1:33pm):**

<http://www.mbda.gov/node/1475/submission/424>