

U.S. Department of
Homeland Security

United States
Coast Guard



Director
United States Coast Guard
National Vessel Documentation Center

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January 7, 2025

Constantine G. Papavizas, Esq.
Winston & Strawn, LLP
1901 L Street, NW
Washington, DC 20036

Re: Combifloat/Poseidon Joint Venture Citizen Determination Request

Dear Mr. Papavizas:

This is in response to your letter of November 19, 2024, in which you requested written confirmation from the U.S. Coast Guard that the proposed joint venture between Combifloat, Inc., a Combifloat Systems B.V. affiliate and Delaware corporation, and Poseidon, LLC, an Indiana limited liability company, will be eligible for coastwise citizenship status under the Jones Act pursuant to 46 U.S.C. § 50501.

Based upon the representations and supporting materials you submitted, including the visual representation of the tiered ownership structure, legal and ownership analyses, and the list of potential board decisions requiring approval of at least one Combifloat-appointed manager, we confirm that the joint venture's ownership structure, as proposed, will not affect the joint venture's eligibility to qualify as a deemed coastwise U.S. citizen under 46 U.S.C. § 50501. If any of the representations and documents you submitted materially change, this confirmation shall be null and void.

Sincerely,

A handwritten signature in cursive script that reads "Christina G. Washburn".

Christina G. Washburn
Director