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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA *ex rel.*
DEVYN TAYLOR,

Plaintiff,

-v-

GMI CORPORATION,

Defendant.

16 Civ. 7216 (PGG)

**COMPLAINT-IN-INTERVENTION
OF THE UNITED STATES OF
AMERICA**

JURY TRIAL DEMANDED

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

-v-

SAMSUNG C&T AMERICA, INC.,

Defendant.

Plaintiff the United States of America (the “United States” or “Government”), by its attorney, Damian Williams, United States Attorney for the Southern District of New York, files this Complaint-in-Intervention against defendant Samsung C&T America, Inc. (“SCTA” or “Defendant,”), alleging as follows:

PRELIMINARY STATEMENT

1. The United States brings this civil fraud action against SCTA under the False Claims Act, 31 U.S.C. § 3729 *et seq.* From May 2016 through December 2018, SCTA, as importer of record for the customs entries listed in Appendix A, violated the False Claims Act by misclassifying under the Harmonized Tariff Schedule of the United States (the “HTS”) certain footwear included in many of these entries, and by causing entry summary forms to be presented to U.S. Customs and Border Protection (“CBP”) that SCTA knew or had reason to know contained false classifications. SCTA provided its customs brokers with invoices and other documents and information that contained inaccurate HTS classifications and misrepresented the materials and construction of the footwear. As a result, footwear was entered at a lower duty rate than would have been applicable had the footwear been properly classified, and SCTA thereby avoided paying the full amount of customs duties owed.

JURISDICTION AND VENUE

2. This Court has jurisdiction over the claims brought under the False Claims Act pursuant to 31 U.S.C. § 3730(a) and 28 U.S.C. §§ 1331, 1345.

3. This Court may exercise personal jurisdiction over Defendant pursuant to 31 U.S.C. § 3732(a), which provides for nationwide service of process. Moreover, Defendant is a New York corporation headquartered in New Jersey that maintains an office in this district.

4. Venue is appropriate in this district pursuant to 31 U.S.C. § 3732(a) and 28 U.S.C. § 1391(b) and (c) because a substantial part of the events or omissions giving rise to the claims occurred in this district, and Defendant maintains an office in this district.

5. On January 24, 2023, SCTA and the Government executed a tolling agreement, which tolled the period from April 28, 2022 to February 3, 2023, for the purpose of determining

whether the Government's claims arising in connection with SCTA's classification of imported goods had been filed timely.

PARTIES

6. Plaintiff is the United States of America.

7. Relator Devyn Taylor ("Relator") is a former employee of GMI USA Corp. ("GMI"), a company that designs, develops, and sources footwear, which worked in partnership with SCTA to import footwear from foreign manufacturers. As part of her duties at GMI, Relator was involved in footwear design. In September 2016, Relator filed an action pursuant to the False Claims Act alleging, among other things, that GMI caused to be submitted entry summary forms that materially underreported to CBP the value of certain footwear imported into the United States.

8. Defendant Samsung C&T America, Inc., is a New York corporation that is headquartered in New Jersey and maintains an office at 1430 Broadway, 22nd Floor, New York, New York. SCTA is a United States subsidiary of Samsung C&T Corporation, a Korean conglomerate operating in multiple industries around the world.

BACKGROUND

9. All merchandise imported into the United States is required to be "entered," unless specifically excepted. 19 C.F.R. § 141.4(a); 19 U.S.C. § 1484. "Entry" means, among other things, that an importer or its agent must file appropriate documents with an officer of CBP that allow the agency to assess the customs duties due on the merchandise being imported into the United States. 19 C.F.R. § 141.0a(a).

10. Pursuant to 19 U.S.C. § 1484, an “importer of record” is responsible for paying the customs duty and using reasonable care in making and providing accurate documentation to CBP so that CBP may properly assess duties on merchandise. 19 U.S.C. § 1484(a)(1)(B).

11. Among the documents required to be filed with CBP to complete entry is a CBP Form 7501 (or “entry summary form”) declaring the value of the merchandise and the applicable duty rate. 19 C.F.R. § 142.3(a).

12. Entry summary forms include a declaration that “the statements in the documents herein filed fully disclose to the best of [the declarant’s] knowledge and belief the true prices, values, quantities, rebates, drawbacks, fees, commissions, and royalties and are true and correct.” The forms also require the importer to declare that it “will immediately furnish to the appropriate CBP officer any information showing a different statement of facts.” CBP Form 7501.

13. Federal law provides that every importer of record must file a declaration stating, *inter alia*, that the “statements in the invoice or other documents filed with the entry, or in the entry itself, are true and correct.” 19 U.S.C. § 1485(a)(3).

14. Applicable duty rates are calculated based on classification under the HTS. The importer of record is responsible for accurately classifying merchandise to be entered into the United States by assigning proper HTS codes to the merchandise and ensuring that the importer’s customs brokers record those codes on entry summary forms. *See* 19 U.S.C. § 1484.

15. Invoices for footwear classifiable under headings 6401 through 6405 of the HTS must include additional information specified by regulation including, *inter alia*, the materials and construction of the footwear and the footwear’s intended use. *See* 19 C.F.R. § 141.89. This information is commonly provided on forms known as Interim Footwear Invoices and similar documents.

16. SCTA, like many other importers of record, uses customs brokers to help clear goods for entry by preparing the entry summary form and other necessary paperwork and calculating taxes and duties. The customs brokers used by SCTA completed the entry summary forms based on the information, including invoices, provided by SCTA and its business partners. As importer of record, SCTA is ultimately responsible for the accuracy of the information reported to CBP.

FACTUAL ALLEGATIONS

I. SCTA's Importation of Footwear

17. SCTA is a global trading and investment company that engages in international commodities trading, product marketing and distribution, and new business development. SCTA, among other things, imports and sells footwear. In doing so, SCTA partnered with other footwear companies in the United States, including GMI.

18. As relevant here, from May 2016 through December 2018 (the "Relevant Period"), SCTA, in conjunction with GMI, imported footwear manufactured overseas into the United States, including from manufacturers in China and Vietnam. GMI was involved in the design, development, and sourcing of the footwear. SCTA served as the importer of record for the entries of footwear listed in Appendix A. SCTA also provided other services in connection with the importation and sale of the footwear, including financing, transportation, warehousing, and distribution. The imported footwear was sold in the United States under various affiliated brand names.

19. As importer of record, SCTA was responsible for using reasonable care to provide CBP with accurate information and documentation to allow CBP to assess the applicable customs duties, and was responsible for paying the customs duties owed on the footwear.

20. SCTA engaged customs brokers to submit information and documentation (including invoices) to CBP in connection with the importation of the footwear. SCTA and GMI provided SCTA's customs brokers with commercial invoices and other documentation, including Interim Footwear Invoices, that purportedly reflected the tariff classification of the footwear under the HTS and the materials and construction of the footwear.

II. During the Relevant Period, SCTA Misclassified Imported Footwear, Resulting in the Underpayment of Customs Duties

21. During the Relevant Period, SCTA misclassified certain footwear in many of the entries listed in Appendix A (the "Subject Footwear") and caused entry summary forms to be submitted to CBP that SCTA knew or had reason to know contained false classifications of the footwear. As a result of such misclassifications, in many instances, the Subject Footwear was entered at a lower duty rate than would have been applicable had the footwear been properly classified, and SCTA thereby avoided paying the full amount of customs duties owed.

22. SCTA provided its customs brokers with documentation and information, including commercial invoices and Interim Footwear Invoices, that (i) misclassified the footwear under the HTS, and/or (ii) contained inaccurate information concerning the materials and construction of the footwear. This information was material to CBP's classification of the footwear and the determination of the applicable duties owed to the United States.

23. The tariff classifications for footwear depend on the characteristics of the footwear, including the materials from which the footwear is manufactured, aspects of the way the footwear is constructed, and the intended use of the footwear. Moreover, the duties owed vary significantly based on the classification of the footwear.

24. For instance, to be classified under HTS number 6402.99.3145, which bears a duty rate of 6% of the value of the shoe, footwear must have "outer soles and uppers of rubber or

plastics” and specifically must have “uppers of which over 90% of the external surface area (including accessories and reinforcements) is rubber or plastics.”¹ However, this category excludes, *inter alia*, “footwear having a foxing or foxing-like band applied or molded at the sole and overlapping the upper.”² Footwear of similar materials and characteristics that do feature a “foxing or foxing-like band” are classified under HTS number 6402.99.8031, and are subject to a significantly higher duty rate of 20% of the shoe’s value plus 90 cents per pair. *See, e.g.*, U.S. Customs Service, Ltr. Ruling No. NY N107647 (June 10, 2010).

25. SCTA was aware that it was improper to classify footwear that featured a foxing or foxing-like band under HTS number 6402.99.3145. For instance, in April 2016, SCTA’s customs broker notified an SCTA manager and others that the broker had “repeatedly advised that if a shoe has a foxing (rubber band around the bottom overlapping the upper) [i]t can’t be brought in at 6%.” Rather, assuming the value of the shoe was under \$12.00, the duty rate would be “20% + .90 [cents per pair].” The customs broker added that unless the footwear was accompanied by documentation indicating “that the shoe does not have a foxing and that it is over 90% rubber/plastic [the duty rate] will never be 6%.”

26. Nonetheless, SCTA misclassified certain Subject Footwear under HTS number 6402.99.3145 during the Relevant Period, even though it knew or should have known that the footwear in question featured a foxing or foxing-like band and/or did not have uppers of which

¹ The “upper” is the part of the footwear above the sole.

² A “foxing” is a strip of material, separate from the sole and upper, that secures the joint where the upper and sole meet, which is usually attached by a vulcanization process or by cementing or stitching. A foxing must be applied or molded at the sole and overlap the upper and substantially encircle the entire shoe. A “foxing-like band” has the same or nearly the same appearance, qualities, or characteristics as a foxing.

over 90% of the external surface area was rubber or plastics. If SCTA had correctly classified this footwear, it generally would have had been required to pay higher duty rates to CBP.

27. In addition, SCTA provided its customs brokers with information and documentation that otherwise misrepresented the materials and construction of certain Subject Footwear which also resulted in a reduction of the applicable duty rate for the imported merchandise. For example, SCTA at times claimed that the uppers of certain styles of Subject Footwear were constructed of textile materials, when in fact they were constructed of rubber or plastic materials. As another example, SCTA at times claimed that certain styles of Subject Footwear had a rubber or plastic material making up the greatest portion of the sole in contact with the ground, when in fact textile materials represented the majority material in contact with the ground. Such misrepresentations resulted in misclassifications of the Subject Footwear and as a result, in certain instances, SCTA underpaid duties on the relevant entries of footwear.

28. The following examples reflect instances in which the Subject Footwear entered by SCTA as importer of record were misclassified, and where as a result SCTA underpaid the customs duties owed to the United States.

29. ***Defendant's Entry of Footwear on August 8, 2016.*** In connection with the entry numbered G1301090214, SCTA initially provided its customs broker with documentation asserting that the footwear in an upcoming shipment should be classified under, *inter alia*, HTS number 6402.99.8031. As stated above, this classification is used for certain footwear with "outer soles and uppers of rubber or plastics," and may include footwear with a foxing or a foxing-like band, and is subject to a duty rate of 20% of the shoe's value plus 90 cents per pair. Based on that information, SCTA's customs broker prepared an entry summary form reflecting total duties for the entry of \$27,699.50.

30. However, after the shipment of footwear had reached the United States, the SCTA employee asked the customs broker to revise the entry summary form, now inaccurately claiming that more than half of the line items of footwear in the entry (including a number of the entries previously claimed to be classified under HTS number 6402.99.8031) should instead be classified under HTS number 6402.99.3145, which bears a duty rate of 6%. At the same time, the SCTA employee provided the customs broker with Interim Footwear Invoices indicating that the footwear lacked a foxing or foxing-like band. Based on the revised information, the customs broker prepared a revised entry summary form indicating that the total duty for the entry was only \$8,348.44 and that the classification of the majority of the line items should be under HTS number 6402.99.3145. The revised entry summary form was submitted to CBP.

31. The revised information SCTA provided to its customs broker was inaccurate, and the footwear at issue was not eligible to be classified under HTS number 6402.99.3145. The footwear actually featured a foxing or foxing-like band, which rendered the footwear ineligible for this classification.

32. As a result of the inaccurate information SCTA caused to be submitted to CBP, which it knew or had reason to know was inaccurate, SCTA underpaid duties associated with the relevant entry of footwear.

33. *Defendant's Entry of Footwear on February 24, 2017.* In connection with the entry numbered G1301118437, SCTA provided its customs broker with various documentation, including commercial invoices, Interim Footwear Invoices, and the claimed HTS classifications for the footwear in the shipment. After SCTA's customs broker noted that the documentation was inconsistent with the HTS classifications SCTA was claiming for the footwear in the shipment, a GMI employee emailed the foreign manufacturer of the footwear, copying an SCTA

employee, requesting a revised Interim Footwear Invoice to match the desired HTS classification for a particular footwear style. The foreign manufacturer ultimately provided a revised Interim Footwear Invoice that indicated (in contrast to the information provided initially) that all of the footwear in the entry did not have a foxing or foxing-like band, and had uppers of which over 90% of the external surface area was made of rubber or plastics. This description of the materials and construction differed from the information in the original documentation that SCTA had initially provided to its customs broker. The revised documentation stated that the applicable HTS number for all of the line items of footwear in the entry should be 6402.99.3145, which bears a duty rate of 6%.

34. Based on these revised documents, SCTA's customs broker prepared an entry summary form calculating the total duties for the entry based on the revised classifications under HTS number 6402.99.3145 and the duty rate of 6%.

35. The revised information provided to SCTA's customs broker was inaccurate, and the footwear at issue was not eligible to be classified under HTS number 6402.99.3145. In fact, certain footwear in this entry did feature a foxing or foxing-like band, and certain footwear in this entry did not feature uppers of which over 90% of the external surface area was made of rubber or plastics. These characteristics rendered the footwear at issue ineligible for classification under HTS number 6402.99.3145.

36. As a result of the inaccurate information SCTA caused to be submitted to CBP, which it knew or had reason to know was inaccurate, SCTA underpaid duties associated with the relevant entry of footwear.

37. ***Defendant's Entry of Footwear on March 27, 2017.*** In connection with the entry numbered G1301121035, an SCTA employee requested that a GMI employee clarify the

materials used in a specific style of footwear, as the Interim Footwear Invoice and claimed HTS classification conflicted as to whether the upper was constructed of a textile material or rubber and/or plastic.

38. In response, GMI emailed a representative of the foreign manufacturer of the footwear, copying SCTA employees, and asked the manufacturer to “[f]ollow the HTS code and redo the IFI to MATCH [sic]”—in other words, to revise the Interim Footwear Invoice to reflect the desired HTS classification. The foreign manufacturer’s representative advised that the upper of this style of shoe in fact was constructed of a rubber/plastic material, and questioned the request for documentation stating that the upper was instead made of textile material. Nonetheless, the foreign manufacturer’s representative noted that he had “follow[ed] your instruction to have it revised,” and provided the requested revised Interim Footwear Invoice.

39. After additional follow-up email correspondence, the SCTA employee requested that the foreign manufacturer make further changes to the Interim Footwear Invoice—which still included entries that reflected a “rubber and/or plastic” upper material—so that it reflected that the footwear had an upper primarily made up of textile materials. The final revised Interim Footwear Invoice claimed that the applicable HTS number was 6404.11.8590, which bears a duty rate of 12.5%.

40. The revised information provided to SCTA’s customs broker was inaccurate, and the footwear at issue was not eligible to be classified under HTS number 6404.11.8590, which applies to footwear with “uppers of textile material other than vegetable fibers and having outer soles with textile materials having the greatest surface area in contact with the ground.” In fact, the uppers of the footwear at issue were constructed of plastic or rubber materials, as the foreign manufacturer had told SCTA, and the footwear featured a foxing or foxing-like band. As noted

previously, footwear with “outer soles and uppers of rubber or plastics,” including footwear with a foxing or a foxing-like band, is subject to a duty rate of 20% of the shoe’s value plus 90 cents per pair if properly classified under HTS number 6402.99.8031.

41. Also included in the same entry were two line items of footwear classified under HTS number 6402.99.3145, which as noted above bears a duty rate of 6%. In fact, the footwear in these two line items featured a foxing or foxing-like band, and was thus ineligible for this classification.

42. As a result of the inaccurate information SCTA caused to be submitted to CBP, which it had knew or had reason to know was inaccurate, SCTA underpaid duties associated with the relevant entry of footwear.

* * *

43. The examples above represent only a small subset of the Subject Footwear entered by SCTA as importer of record that reflected misclassifications of the Subject Footwear under the HTS and/or that contained inaccurate information about the Subject Footwear.

44. SCTA’s misclassification of the Subject Footwear and misreporting of the true materials and construction of the footwear were material to CBP’s assessment and collection of customs duties. CBP determines the duties owed on imported footwear based on the classification of the goods under the HTS. If SCTA had accurately reported the classification of the Subject Footwear under the HTS and the materials and construction of the footwear, in many instances SCTA would have been required to pay higher duties.

CLAIM FOR RELIEF

**Violation of the False Claims Act
31 U.S.C. § 3729(a)(1)(G)
Reverse False Claims**

45. The United States incorporates by reference each of the preceding paragraphs as if fully set forth in this paragraph.

46. The United States seeks relief against SCTA under Section 3729(a)(1)(G) of the False Claims Act, 31 U.S.C. § 3729(a)(1)(G).

47. As set forth above, SCTA knowingly made, used, or caused to be made or used, false records and/or statements material to an obligation to pay or transmit money or property, in the form of customs duties, to the United States, and knowingly concealed and knowingly and improperly avoided or decreased an obligation to pay or transmit money or property, in the form of customs duties owed, to the United States.

48. The United States incurred losses in the form of customs duties underpaid by SCTA because of its wrongful conduct.

49. By virtue of SCTA's misclassification of the Subject Footwear under the HTS and the submission of entry summary forms reflecting these misclassifications, the United States suffered damages and therefore is entitled to treble damages under the False Claims Act, to be determined at trial, and a civil penalty as required by law for each violation.

* * *

WHEREFORE, the United States respectfully requests:

- (1) that judgment be entered in its favor and against SCTA for a sum equal to treble the United States' damages in an amount to be determined at trial, civil penalties to the maximum amount allowed by law, and an award of costs pursuant to 31 U.S.C. § 3729(a); and
- (2) such further relief as the Court may deem proper.

Dated: February 3, 2023
New York, New York

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Appendix A

- G1301072436
- G1301073400
- G1301075074
- G1301075272
- G1301076437
- G1301076957
- G1301078664
- G1301079746
- G1301079753
- G1301080827
- G1301081270
- G1301082518
- G1301082609
- G1301083755
- G1301084407
- G1301084415
- G1301084423
- G1301084431
- G1301085016
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