

From: Wolfram F. Schaffler Gonzalez <wschaffler@ci.laredo.tx.us>  
Sent: Tuesday, December 30, 2025 10:27 AM  
To: The Office of the President <president@LAREDO.EDU>; Nathan Bratton <nbratton@webbcountytexas.gov>; Laida Benavides <lbenavides@uisd.net>; Sylvia V <svi@uisd.net>  
Cc: Gilberto Sanchez <gsanchez@ci.laredo.tx.us>; Manuel De Luna, Jr. <mdeluna@ci.laredo.tx.us>; Johnny Araiza <johnny.araiza@dunavant.com>  
Subject: FTZ94 Respectfully Requests Letter of Concurrence for Dunavant Logistics Group

EXTERNAL EMAIL: This email message came from an external source. Do not click any links or open any attachments unless you trust the sender and know the content is safe.  
Good afternoon and Happy New Year!!!

Laredo, Texas, December 29, 2025  
Greetings,

As Grantee of Foreign Trade Zone #94, I hereby request your consideration of a minor boundary modification for DUNAVANT LOGISTICS GROUP, LLC located within the city limits of Laredo, Texas and Webb County as approved under current FTZ #94 program area.

The proposed FTZ operator DUNAVANT LOGISTICS GROUP, LLC is requesting a letter of concurrence from your organization in support of establishing an ASF/Usage-Driven FTZ designation at its facilities located at 4013 QUIVIRA DR., LAREDO, TEXAS, 78045.

For your review and consideration, see attached documents:

- 02 FTZ Application from intended operator
- 03 Letter of request from intended operator
- 04 Right to Use Letter from owner of facilities authorizing the FTZ application.
- 05 Aerial view of the facilities, showing the name of the adjacent street and with a red line the outline of the facilities which are being requested for Designation by the National FTZ Board.
- 06 Areas to later be activated by CBP (in red outline).

Thank you for your time and assistance. Should you have any questions, feel free to contact me.

Respectfully,

Dr. Federico Schaffler  
Foreign Trade Administrator  
Laredo International Airport  
Foreign Trade Zone #94  
4719 Maher • Laredo, TX 78041  
O. 956-795-2000 Ex: 2822  
C. 956-220-1835  
wschaffler@ci.laredo.tx.us

[www.flylaredotexas.com](http://www.flylaredotexas.com)  
[www.cityoflaredo.com](http://www.cityoflaredo.com)



# CITY OF LAREDO

## LAREDO INTERNATIONAL AIRPORT

FOREIGN TRADE ZONE #94

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Laredo, Texas, December 29, 2025

Greetings,

As Grantee of Foreign Trade Zone #94, I hereby request your consideration of a minor boundary modification for **DUNAVANT LOGISTICS GROUP, LLC** located within the city limits of Laredo, Texas and Webb County as approved under current FTZ #94 program area.

The proposed FTZ operator **DUNAVANT LOGISTICS GROUP, LLC** is requesting a letter of concurrence from your organization in support of establishing an ASF/Usage-Driven FTZ designation at its facilities located at **4013 QUIVIRA DR., LAREDO, TEXAS, 78045**.

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- 06 Areas to later be activated by CBP (in red outline).

Thank you for your time and assistance. Should you have any questions, feel free to contact me.

Respectfully,

**Dr. Federico Schaffler**  
Foreign Trade Administrator  
Foreign Trade Zone #94

**Application for Subzone or Usage-Driven Designation (“Minor  
Boundary Modification”) Under the Alternative Site Framework (ASF)**

**Instruction Sheet**

This collection of information contains Paperwork Reduction Act (PRA) requirements approved by the Office of Management and Budget (OMB). Notwithstanding any other provision of law, no person is required to, nor shall any person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the PRA unless that collection of information displays a currently valid OMB control number. Public reporting burden for this collection of information is estimated to average 3.5 hours, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Persons wishing to comment on the burden estimate or any aspect of this collection of information, or offer suggestions for reducing this burden, should send their comments to the ITA Reports Clearance Officer, International Trade Administration, U.S. Department of Commerce, 14<sup>th</sup> and Constitution Avenue, NW, Washington, DC 20230.

No zone, subzone, zone expansion/reorganization/modification, or production authority may be approved unless a completed application/notification/request has been received (19 U.S.C. 81a-81u; 15 CFR Part 400). The Foreign-Trade Zones Board has no authority to finance zone projects. Its approval is in the form of a grant of authority (license) for operating a facility under foreign-trade zone procedures. The basic requirements for foreign-trade zone applications are found in the regulations of the Foreign-Trade Zones Board (15 CFR Part 400), including Sections 400.21 through 400.25. Application formats are available on the [FTZ Board web site](#).

Corporations submitting applications must be qualified to apply under the laws of the state in which the zone is to be located. Applicants may submit drafts of their applications to the FTZ Staff, who can provide comments and technical assistance in interpreting the Board's regulations.

Applicants should note that conduct of their proposed activity under FTZ procedures includes an additional, ongoing information-collection burden associated with the Annual Report from Foreign-Trade Zones (OMB Control No. 0625-0109).

FTZ Staff  
March 2013

Foreign-Trade Zones Board  
U.S. Department of Commerce  
1401 Constitution Avenue, N.W., Room 21013  
Washington, D.C. 20230  
(202) 482-2862

## Alternative Site Framework

### APPLICATION FOR SUBZONE OR USAGE-DRIVEN DESIGNATION (“MINOR BOUNDARY MODIFICATION”)

**NOTE: This format is only for a Minor Boundary Modification (MBM) to propose a “Subzone” or “Usage-Driven” site(s) under the Alternative Site Framework (ASF).**

#### INSTRUCTIONS

**General:** The request should include a cover letter from the grantee identifying the specific company for which it is requesting a Subzone or Usage-Driven site and a document answering the questions using the template below. Leave each question in place (including its number) and provide your response directly below each question.

**Subzone versus Usage-Driven Designation:** Both usage-driven sites and subzone sites designated under this process, are subject to the standard three-year sunset provision. There is no substantive difference between selecting the “subzone” or “usage-driven site” option. However, if a company anticipates needing more than one site, subzone designation is recommended to facilitate CBP paperwork for movement between sites.

**Sites versus Parcels:** A "site" is comprised of one or more generally contiguous parcels of land organized and functioning as an integrated unit, such as all or part of an industrial park or airport facility. If parcels do not meet that definition, they must be treated as separate sites.

**Submitted Request Must Be Complete:** Submitted MBM requests must be complete – with the sole allowable exception of any comments from U.S. Customs and Border Protection (CBP). **Requests must be submitted as a single document;** the FTZ Staff cannot assemble requests from individual documents submitted separately.

If a letter from CBP is not included, a copy of your request must be provided to CBP no later than when the request is submitted to our office (see section 400.38(a) of the FTZ Board’s regulations), and noting the regulations provide CBP with 20 days to submit comments.

**Submission of Completed Application:** Submit the final application by email ([ftz@trade.gov](mailto:ftz@trade.gov)) (**Adobe PDF format preferred**; you may use MS Word format if you are unable to submit PDF). The application must include color maps and signed versions of all letters. The application must be submitted by or copied (CC’d) to the grantee.

**Timing:** Under the FTZ Board’s regulations, the ordinary timeframe to process MBM requests is within 30 days of the FTZ Staff having received a complete request, including receipt of CBP’s comments on the request.

## Alternative Site Framework

### APPLICATION FOR SUBZONE OR USAGE-DRIVEN DESIGNATION (“MINOR BOUNDARY MODIFICATION”)

#### QUESTIONS

1. Please mark the appropriate space below to indicate whether you are requesting “Subzone” or “Usage-Driven” designation for the proposed site(s):

\_\_\_\_\_ Subzone      \_\_\_ **X** \_\_\_ Usage-Driven

2. List the full address of the site(s), including the jurisdiction in which the site(s) falls (town, city, county, and zip code).

*4013 Quivira Drive, Laredo TX, Webb County, 78045*

3. State the grantee’s approved ASF service area and explain how the proposed site(s) is within that ASF service area.

*Foreign Trade Zone #94, which covers all of Webb County.*

4. State the acreage of the proposed site(s).

*4.42 Acres*

5. Indicate the company for which the site(s) will be designated.

*Dunavant Logistics Group, LLC*

6. Provide a summary of the company’s planned activities.

*Planned activities will include the **receiving, inspection, storage, inventory management, consolidation, deconsolidation, and transloading** of imported merchandise. All activities will be conducted in full compliance with U.S. Customs and Border Protection (CBP) and FTZ regulations.*

*The **initial type of merchandise** to be handled within the FTZ will consist of **aftermarket air conditioning units and related components for automobiles**, imported, to be exported to Latin America. Duties and fees will be **deferred, reduced, or paid upon withdrawal from the FTZ for domestic consumption**, as applicable, in accordance with FTZ procedures.*

7. Indicate the current zoning and the existing and planned buildings (including square footage) for the site(s). (Note: Areas with inappropriate zoning – such as agricultural, retail, or residential – are not eligible for FTZ status and should not be proposed in any MBM request.)

*Total area of the facilities to be Designated: 4.42 Acres (192,535.2 sq. ft.)*

*Total area of warehouse: 57,269 sq. ft.*

*Current Zone: M1/other*

*Building is commercial warehouse and yards.*

8. Is FTZ designation or the use of FTZ procedures a requirement or a precondition for future activity or construction at the site(s)?

\_\_\_\_\_ Yes      \_\_\_ **X** \_\_\_ No

9. List the owner(s) of the property. If not owned by the grantee or the company for which the site(s) will be designated, then provide a "Right to Use" letter: either a signed letter from the proposed operator on its letterhead attesting to its right to use the property or a letter from the owner of the proposed site(s) attesting to the operator's right to use the property.

*Quivira Developments I, Inc.*

## ATTACHMENTS

Provide the documents listed below (items 10 and 11, plus item 12 if applicable) as attachments at the end of the application.

10. A clear and detailed site map showing existing and planned structures. The proposed site boundaries must be outlined clearly in red. Note that if streets or similar landmarks are not legible on the site map, you will also need to provide a detailed street map with the proposed site's boundaries in red. Any map should be no larger than letter-sized (8 1/2" x 11") and clearly labeled, with legends provided for any markings.
11. Comments from U.S. Customs and Border Protection (CBP): The application should include comments from CBP. Alternatively, the grantee may provide a copy of its request to CBP for comments at the time the application is submitted to the FTZ Board, in which case the grantee should also communicate with CBP regarding the 20-day timeframe in the FTZ Board's regulations for CBP to provide comments to the FTZ Board.
12. If your state (such as TX, KY, AZ) has one or more taxes for which collections will be affected by the proposed FTZ designation of the new site(s), please attach all of the following:

A. An explanation of the specific local taxes that will be affected;

***Local taxes that will be affected are:***

- **Webb County:** Local personal property taxes.
- **City of Laredo:** Local personal property taxes.
- **Laredo College:** Local Personal Property taxes
- **United Independent School District:** Local ad valorem taxes

B. A stand-alone letter that:

- Lists all of the affected parties;
- Includes a statement below the list certifying that this is a complete list of all parties that would be affected by this particular request; and,
- Is signed by an official of the grantee organization. ***(This is done by us, as Grantee of FTZ94)***

C. Correspondence from all of the affected parties (such as a local school board) indicating their concurrence (or non-objection) regarding the proposed FTZ designation.

**December 22, 2025**

City of Laredo  
Laredo International Airport  
Foreign Trade Zone #94  
Attn: Dr. Wolfram F. Schaffler  
Foreign Trade Administrator

**RE: Letter of Intent – ASF Usage-Driven FTZ Designation**

Dear Dr. Schaffler,

Please accept this letter of intent for the DESIGNATION of the 4.42 acres of our complete facilities located at 4013 Quivira Dr, Laredo, TX 78045 an Alternative Site Framework (ASF) Usage-Driven Foreign Trade Zone. Once approved by the National Foreign Trade Zone Board, we will initially request to CBP the ACTIVATION of a total of 55,921.15 sq. ft. (Warehouse space: 27,998.02 sq. ft., Yard space: 27,923.13 sq. ft.) within our facilities.

We have attached maps clearly indicating the FTZ area being requested. In addition, we have included the required letter of authorization from the property owner, authorizing Dunavant Logistics Group, LLC to apply for and operate the proposed FTZ area.

For purposes of local responsibility, follow-up coordination, U.S. Customs and Border Protection (CBP) matters, annual invoicing, site visits, and inclusion in the public FTZ directory, the designated local FTZ contact is as follows:

Johnny Araiza  
Vice President, Cross-Border & Mexico Operations  
**Dunavant Logistics Group, LLC**  
4013 Quivira Dr  
Laredo, TX 78045  
Phone: 956-285-4648  
Email: Johnny.araiza@dunavant.com

Mr. Araiza will serve as the primary local point of contact for all FTZ-related operational, compliance, and administrative matters associated with this site. Should you require any additional information or clarification, please do not hesitate to contact us. We appreciate your time and consideration and look forward to working closely with the City of Laredo and FTZ #94.

*Mary Arno*  
Sincerely,

**Mary M. Arno, LCB, CCS, CES**

Vice President, Regulatory U.S. Operations

**Dunavant Logistics Group, LLC**

959 Ridgeway Loop Rd, Suite 205

Memphis, TN 38120

Phone: 901-369-1686

Email: [mary.arno@dunavant.com](mailto:mary.arno@dunavant.com)

# QUIVIRA DEVELOPMENTS I, INC.

## LETTER OF AUTHORIZATION

### Foreign-Trade Zone (FTZ) Activation

**Date:** 12/22/2025

**To:**

Foreign-Trade Zones Board  
U.S. Department of Commerce

**Subject:** Letter of Authorization – Foreign-Trade Zone Activation

**Property Address:** 4013 Quivira Dr., Laredo, Tx 78045

**Legal Description:** Lot 10, block 1, Emerald Industrial Park.

To Whom It May Concern,

This letter serves as formal authorization from **QUIVIRA DEVELOPMENTS I, INC.**, as the owner and lessor of the property located at 4013 Quivira Dr., Laredo, Tx 78045, including the legal description noted above, to Dunavant Logistics Group, LLC, as lessee of the facility.

We acknowledge and fully support Dunavant Logistics Group, LLC intent to apply for designation, activation, and operation of a Foreign-Trade Zone (FTZ) at the above-referenced premises in accordance with all applicable regulations of the Foreign-Trade Zones Board and U.S. Customs and Border Protection (CBP).

As property owner, **QUIVIRA DEVELOPMENTS I, INC.**, hereby authorizes Dunavant Logistics Group, LLC to:

- Apply for FTZ designation and activation for the leased premises
- Operate and manage FTZ activities within the facility
- Make reasonable modifications to the premises as required for FTZ compliance, subject to the terms of the lease agreement and applicable laws

This authorization is granted solely for FTZ-related purposes and does not alter ownership rights or obligations under the existing lease agreement.



Should you require any additional information or confirmation regarding this authorization, please feel free to contact the undersigned.

Sincerely,

---

**Humberto Garza Dominguez**

**Title:** President

**Company:** QUIVIRA DEVELOPMENTS I, INC.

**Address:** 2824 E. Bustamante St., Laredo Texas, 78041.

**Phone:** (956)729-1536

**Email:** jjuberth@univest.com.mx

**Signature:**                     *Garza*                    

**Date:**                     22/Dec/2025

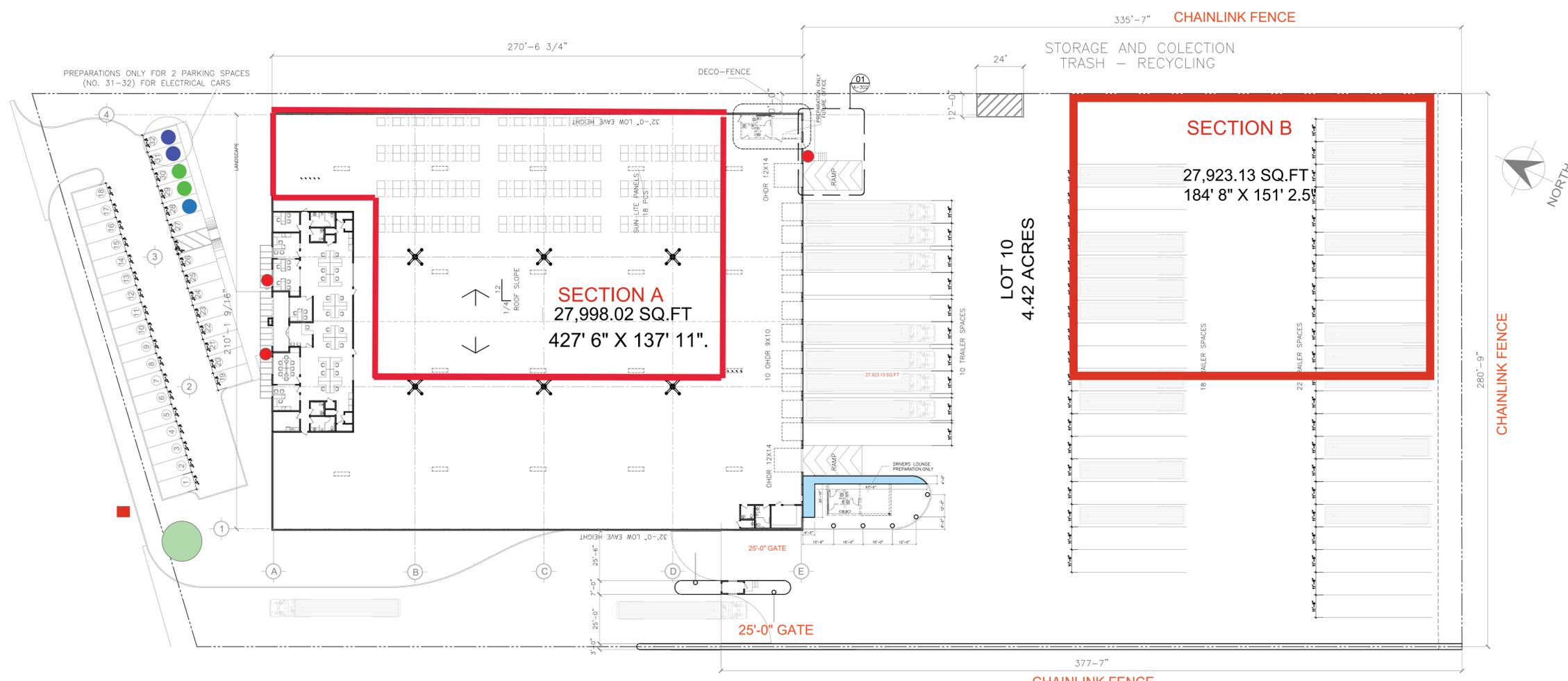
# DUNAVANT

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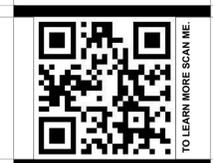
Dunavant Logistics  
Group, LLC

LOT 10  
4.42 ACRES



**PARK AVENUE**  
 CONSTRUCTION  
 6909 SPRINGFIELD AVE, SUITE 303  
 LAREDO TEXAS, 78041  
 PH 956.727.72.75  
 WWW.PARKAVECONST.COM

**HI-TECH TILT**  
 WWW.HI-TECHTILT.COM

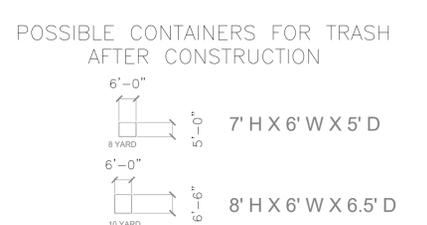
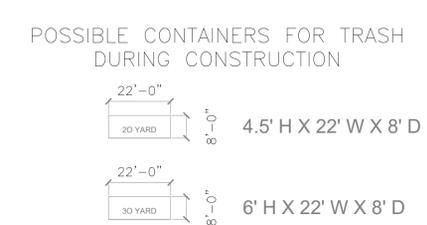


PROJECT: **QUIVIRA DEVELOPMENTS 1, INC**  
 4013 QUIVIRA DRIVE, LOT 10, BLOCK 1, EMERALD INDUSTRIAL PARK

**GENERAL SITEPLAN**

- NO SMOKING SIGNAGE, PLACED ON WALL
  - SMOKE FREE BUILDING SIGN
  - DESIGNATED SMOKING AREA
- IN NEED OF A DESIGNATED SMOKING AREA, ITS LOCATION IS PROPOSED AT MORE THAN 100 FT AWAY FROM THE GENERAL ENTRANCE.

- TOTAL NUMBER OF PARKING SPACES**  
 30 CAR SPACES
- ADA SPACES (2)
  - SIGNAGE FOR EFFICIENT PARKING 5% OF THE TOTAL = 2 CAR SPACES
  - EFFICIENT VEHICLE (2)
  - SIGNAGE FOR SHARED PARKING 5% OF THE TOTAL = 1 CAR SPACES
  - CARPOOL (2)
  - SIGNAGE FOR ELECTRICAL CHARGING 5% OF THE TOTAL = 2 CAR SPACES
  - ELECTRICAL VEHICLES (2)
  - RECYCLING AREA
  - CONTAINERS FOR MIXED PAPER, CORRUGATED CARDBOARD, GLASS, PLASTICS, METALS, BATTERIES AND ELECTRONIC WASTE (2)



BUILDING FOOTPRINT	57,269 SQ.FT.
WAREHOUSE AREA	41,132 SQ.FT.
RACK AREA	13,567 SQ.FT.
WAREHOUSE OFFICE	390 SQ.FT.
OFFICE	2,180 SQ.FT.

**SECTION A 27,998.02 SQ.FT**  
**427' 6" X 137' 11".**

**SECTION B 27,923.13 SQ.FT**  
**184' 8" X 151' 2.5"**

**TOTAL 55,921.15 SQ.FT**

**GENERAL SITE PLAN**

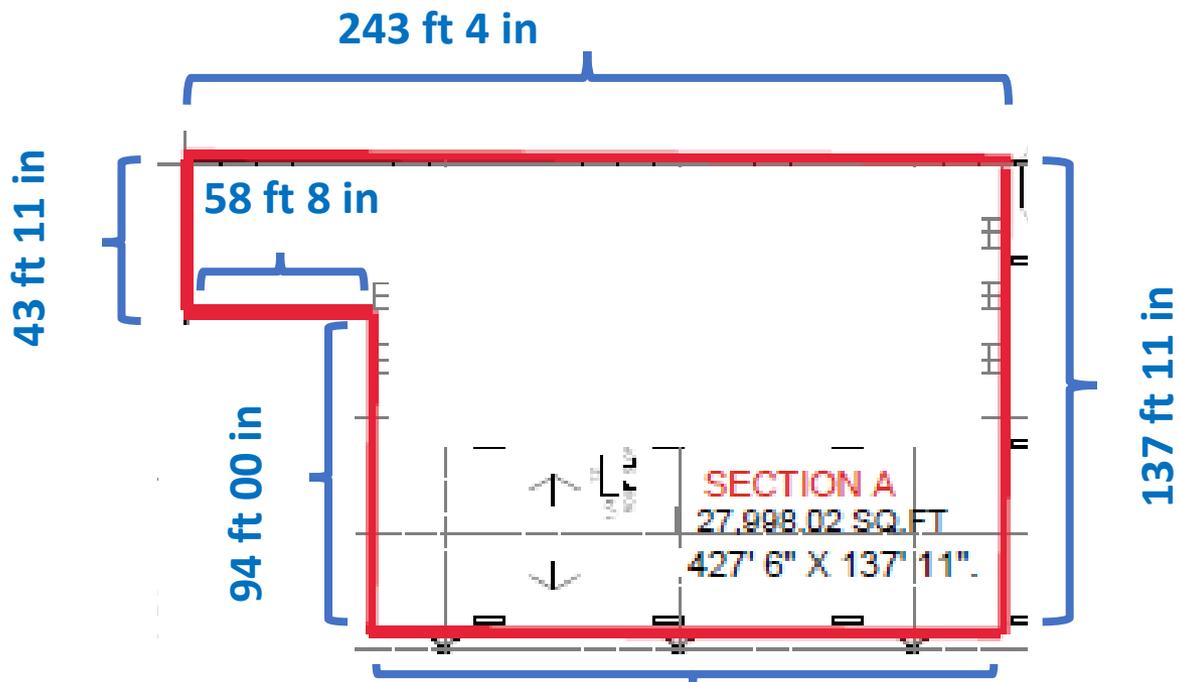
NOTE: CONTRACTOR TO FIELD VERIFY ALL DIMENSIONS IN THE FIELD AND IS TO REPORT ANY DISCREPANCIES  
 SCALE 1" = 30'-0"

**REVISION**

DATE	COMMENT

DESIGNED BY:  
 DRAFTING BY:  
 Apr 04, 2024 - 5:08pm

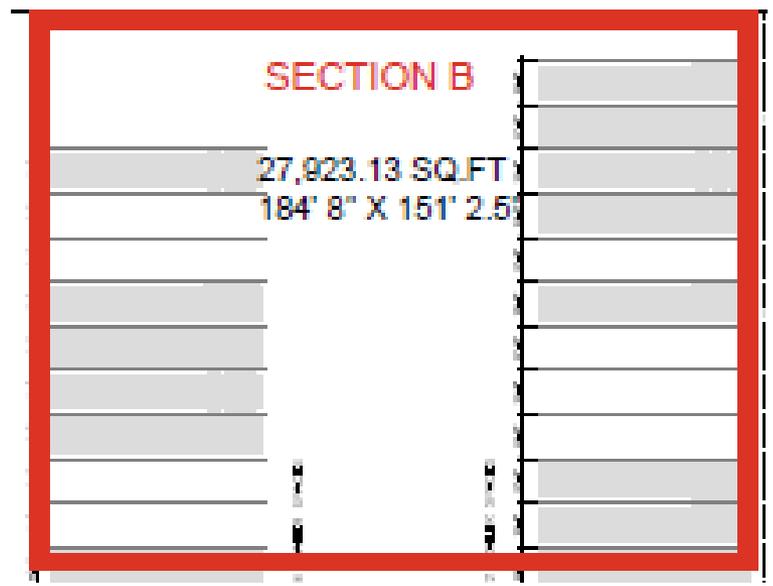
**A-100**  
 2 OF 25 SHEETS



184 ft 8 in

151 ft 2.5 in

184 ft 8 in



SECTION A 27,998.02 SQ.FT  
427' 6" X 137' 11".

SECTION B 27,923.13 SQ.FT  
184' 8" X 151' 2.5"

TOTAL 55,921.15 SQ.FT



# Laredo College

**Fort McIntosh Campus**

West End Washington St.

Laredo, TX 78040-4395

956.722.0521

www.laredo.edu

**South Campus**

5500 South Zapata Highway

Laredo, TX 78046

956.794.4000

Dr. Minita Ramirez  
*President*

**Board of Trustees**  
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*President*

Ernestina "Tita" C. Vela  
*Vice President*

Jackie Leven-Ramos  
*Secretary*

Cindy Liendo  
*Parliamentarian*

Erica Benavides Garcia  
*Trustee*

Mercurio Martinez Jr.  
*Trustee*

Adriana Alexander  
*Trustee*

Lizzy Newsome  
*Trustee*

Karina "Kari" Elizondo  
*Trustee*

January 6, 2026

Ms. Elizabeth Whiteman  
Executive Secretary  
Foreign-Trade Zones Board  
U.S. Department of Commerce  
1401 Constitution Ave., NW, Room 2111  
Washington, DC 20230

RE: City of Laredo Foreign-Trade Zone No. 94  
Minor Boundary Modification – DUNAVANT LOGISTICS GROUP, LLC

Dear Ms. Whiteman:

Laredo College understands that the City of Laredo, Texas, is requesting a Minor Boundary Modification (ASF/usage-driven) within Foreign-Trade Zone No. 94 in Laredo, Texas, on behalf of DUNAVANT LOGISTICS GROUP, LLC, located at 4013 Quivira Dr., Laredo, Texas, 78045, which is situated in Webb County's Taxing Jurisdiction.

Laredo College recognizes the increasing importance of international trade in our community and supports this request. Laredo College is aware that imported inventory and inventory held in the Foreign-Trade Zone for export will be exempt from local personal property taxes when the modification is approved.

Sincerely,

Dr. Minita Ramirez  
President

c: City of Laredo