

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

.....
In the Matter of:)
)
LPPAI, Ltd.)
d/b/a P.A. Inc.)
6626 Gulf Freeway)
Houston, Texas 77087)
)
Respondent)
.....

ORDER RELATING TO LPPAI LTD.

The Bureau of Industry and Security, U.S. Department of Commerce ("BIS") has notified LPPAI, Ltd., of its intention to initiate an administrative proceeding against it pursuant to Section 766.3 of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2005)) ("Regulations"),¹ and Section 13(c) of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) ("Act"),² by issuing a proposed charging letter to LPPAI, Ltd., d/b/a P.A. Inc. (LPPAI) that alleged that it committed five violations of the Regulations. Specifically, the charges are:

¹ The charged violations occurred in 2004. The Regulations governing the violations at issue are found in the 2004 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2004)). The 2005 Regulations establish the procedures that apply to this matter.

² From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential Notices, the last of which was issued on August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§1701 - 1706 (2000)) ("IEEPA"). On November 13, 2000, the Act was reauthorized and it remained in effect through August 20, 2001. Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), as extended by the Notice of August 2, 2005, (70 Fed. Reg. 45273 (August 5, 2005)), has continued the Regulations in effect under IEEPA.

1. *One Violation of 15 C.F.R. §764.2(d) - Conspiracy to Violate the Regulations:* Beginning on or about February 11, 2004 and continuing through on or about February 18, 2004, LPPAI conspired and acted in concert with others, known and unknown, to do or bring about an act that violates the Regulations. The purpose of the conspiracy was to export nickel alloy pipes, items subject to the Regulations and to the Iranian Transactions Regulations,³ from the United States to Iran without prior authorization from the Office of Foreign Assets Control, U.S. Department of the Treasury, as required by Section 746.7 of the Regulations. LPPAI and its co-conspirators took acts in furtherance of the conspiracy by attempting the export of nickel alloy pipes from the United States through the United Kingdom to Iran without the required authorization.
2. *One Violation of 15 C.F.R. § 764.2(c) - Attempted Export of Nickel Alloy Pipes to Iran without the Required Authorization:* On or about February 18, 2004, LPPAI attempted a violation of the Regulations by attempting to export nickel alloy pipes, items subject to the Regulations and to the Iranian Transactions Regulations, to Iran without prior authorization from the Office of Foreign Assets Control, U.S. Department of the Treasury as required by Section 746.7 of the Regulations.
3. *One Violation of 15 C.F.R. § 764.2(e) - Transporting Nickel Alloy Pipes with Knowledge of a Violation of the Regulations:* With respect to the attempted export described above, LPPAI transported nickel alloy pipes with the knowledge that a violation of the Regulations was about to occur or was intended to occur in connection with the nickel alloy pipes. At all times relevant hereto, LPPAI knew

³ 31 C.F.R. Part 360 (2005).

or had reason to know that the nickel alloy pipes in question required authorization from the Office of Foreign Assets Control, U.S. Department of the Treasury, and that the required authorization had not been obtained. LPPAI knew that authorization was required prior exporting the nickel alloy pipes because it had been informed by a freight forwarder of the requirement in an earlier attempt to export the pipes to Iran.

4. *One Violation of 15 C.F.R. § 764.2(h) - Taking Actions with the Intent of Evading the Regulations:* With respect to the attempted export described above, LPPAI took actions with the intent of evading the Regulations. Specifically, LPPAI altered the markings on the crate of nickel alloy pipes that it was attempting to export, and removed markings noting that the nickel alloy pipes were being exported to Iran. LPPAI altered the markings in an attempt to conceal the true ultimate destination of the items.
5. *One Violation of 15 C.F.R. § 764.2(c) - Attempted False Statement on a Shipper's Export Declaration Concerning Ultimate Consignee:* With respect to the attempted export described above, LPPAI attempted a violation of the Regulations by authorizing the filing of a Shipper's Export Declaration showing the ultimate consignee as ProClad Int. Pipelines Ltd., of Staffordshire, United Kingdom. This statement was false because the ultimate consignee was the Hyundai Engineering & Construction Co Ltd, of Dubai, the United Arab Emirates, for use in the country of ultimate destination, Iran.

WHEREAS, BIS and LPPAI have entered into a Settlement Agreement pursuant to Section 766.18(a) of the Regulations whereby they agreed to settle this matter in accordance with the terms and conditions set forth therein, and

WHEREAS, I have approved the terms of such Settlement Agreement;

IT IS THEREFORE ORDERED:

FIRST, that a civil penalty of \$50,000 is assessed against LPPAI, of which \$25,000 shall be paid to the U.S. Department of Commerce within 30 days from the date of entry of this Order; and the remaining \$25,000 shall be paid to the U.S. Department of Commerce not later than June 30, 2006. Payment shall be made in the manner specified in the attached instructions.

SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (2000)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and, if payment is not made by the due date specified herein, LPPAI will be assessed, in addition to the full amount of the civil penalty and interest, a penalty charge and an administrative charge, as more fully described in the attached Notice.

THIRD, that the timely payment of the civil penalty set forth above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to LPPAI. Accordingly, if LPPAI should fail to pay the civil penalty in a timely manner, the undersigned may enter an Order denying all of LPPAI's export privileges for a period of one year from the date of entry of this Order.

FOURTH, for a period five years from the date of entry of the Order, LPPAI, 6626 Gulf Freeway, Houston, Texas 77087, its successors or assigns, and when acting for or on behalf of LPPAI, its officers, representatives, agents, or employees ("Denied Person") may not participate, directly or indirectly, in any way in any transaction involving any commodity, software or technology (hereinafter collectively referred to as "item") exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations, including, but not limited to:

- A. Applying for, obtaining, or using any license, License Exception, or export control document;
- B. Carrying on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations; or
- C. Benefitting in any way from any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations.

FIFTH, that no person may, directly or indirectly, do any of the following:

- A. Export or reexport to or on behalf of the Denied Person any item subject to the Regulations;
- B. Take any action that facilitates the acquisition or attempted acquisition by the Denied Person of the ownership, possession, or control of any item subject to the Regulations that has been or will be exported from the United States, including financing or other support activities related to a transaction whereby the Denied Person acquires or attempts to acquire such ownership, possession or control;
- C. Take any action to acquire from or to facilitate the acquisition or attempted acquisition from the Denied Person of any item subject to the Regulations that has been exported from the United States;
- D. Obtain from the Denied Person in the United States any item subject to the Regulations with knowledge or reason to know that the item will be, or is intended to be, exported from the United States; or

E. Engage in any transaction to service any item subject to the Regulations that has been or will be exported from the United States and which is owned, possessed or controlled by the Denied Person, or service any item, of whatever origin, that is owned, possessed or controlled by the Denied Person if such service involves the use of any item subject to the Regulations that has been or will be exported from the United States. For purposes of this paragraph, servicing means installation, maintenance, repair, modification or testing.

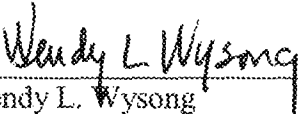
SIXTH, that, after notice and opportunity for comment as provided in Section 766.23 of the Regulations, any person, firm, corporation, or business organization related to LPPAI by affiliation, ownership, control, or position of responsibility in the conduct of trade or related services may also be made subject to the provisions of the Order.

SEVENTH, that this Order does not prohibit any export, reexport, or other transaction subject to the Regulations where the only items involved that are subject to the Regulations are the foreign-produced direct product of U.S.-origin technology.

EIGHTH, that, as authorized by Section 766.18(c) of the Regulations, the denial period set forth above shall be suspended in its entirety for five years from the date of this Order, and shall thereafter be waived, provided that during the period of suspension, LPPAI has committed no violation of the Act or any regulation, order or license issued thereunder.

NINTH, that the proposed charging letter, the Settlement Agreement, and this Order shall be made available to the public.

This Order, which constitutes the final agency action in this matter, is effective immediately.


Wendy L. Wysong
Acting Assistant Secretary of Commerce
for Export Enforcement

Entered this 19th day of August 2005.

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

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In the Matter of:)
)
LPPAI, Ltd.)
d/b/a P.A. Inc.)
6626 Gulf Freeway)
Houston, Texas 77087)
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Respondent)
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SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") is made by and between LPPAI, Ltd. d/b/a P.A. Inc. ("LPPAI"), and the Bureau of Industry and Security, U.S. Department of Commerce ("BIS") (collectively referred to as "Parties"), pursuant to Section 766.18(a) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2005)) ("Regulations"),¹ issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) ("Act"),²

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¹ The violations charged occurred in 2004. The Regulations governing the violations at issue are found in the 2004 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2004)). The 2005 Regulations establish the procedures that apply to this matter.

² From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential Notices, the last of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 - 1706 (2000)) ("IEEPA"). On November 13, 2000, the Act was reauthorized and it remained in effect through August 20, 2001. Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), as extended by the Notice of August 2, 2005, (70 Fed. Reg. 45273 (August 5, 2005)), has continued the Regulations in effect under IEEPA.

WHEREAS, BIS has notified LPPAI of its intention to initiate an administrative proceeding against LPPAI, pursuant to the Act and the Regulation;

WHEREAS, BIS has issued a proposed charging letter to LPPAI that alleged that LPPAI committed five violations of the Regulations, specifically:

1. *One Violation of 15 C.F.R. §764.2(d) - Conspiracy to Violate the Regulations:*
Beginning on or about February 11, 2004 and continuing through on or about February 18, 2004, LPPAI conspired and acted in concert with others, known and unknown, to do or bring about an act that violates the Regulations. The purpose of the conspiracy was to export nickel alloy pipes, items subject to the Regulations and to the Iranian Transactions Regulations,³ from the United States to Iran without prior authorization from the Office of Foreign Assets Control, U.S. Department of the Treasury, as required by Section 746.7 of the Regulations. LPPAI and its co-conspirators took acts in furtherance of the conspiracy by attempting the export of nickel alloy pipes from the United States through the United Kingdom to Iran without the required authorization.
2. *One Violation of 15 C.F.R. § 764.2(c) - Attempted Export of Nickel Alloy Pipes to Iran without the Required Authorization:* On or about February 18, 2004, LPPAI attempted a violation of the Regulations by attempting to export nickel alloy pipes, items subject to the Regulations and to the Iranian Transactions

³ 31 C.F.R. Part 360 (2005).

Regulations, to Iran without prior authorization from the Office of Foreign Assets Control, U.S. Department of the Treasury as required by Section 746.7 of the Regulations.

3. *One Violation of 15 C.F.R. § 764.2(e) - Transporting Nickel Alloy Pipes with Knowledge of a Violation of the Regulations:* With respect to the attempted export described above, LPPAI transported nickel alloy pipes with the knowledge that a violation of the Regulations was about to occur or was intended to occur in connection with the nickel alloy pipes. At all times relevant hereto, LPPAI knew or had reason to know that the nickel alloy pipes in question required authorization from the Office of Foreign Assets Control, U.S. Department of the Treasury, and that the required authorization had not been obtained. LPPAI knew that authorization was required prior exporting the nickel alloy pipes because it had been informed by a freight forwarder of the requirement in an earlier attempt to export the pipes to Iran.
4. *One Violation of 15 C.F.R. § 764.2(h) - Taking Actions with the Intent of Evading the Regulations:* With respect to the attempted export described above, LPPAI took actions with the intent of evading the Regulations. Specifically, LPPAI altered the markings on the crate of nickel alloy pipes that it was attempting to export, and removed markings noting that the nickel alloy pipes were being exported to Iran. LPPAI altered the markings in an attempt to conceal the true ultimate destination of the items.

5. *One Violation of 15 C.F.R. § 764.2(c) - Attempted False Statement on a Shipper's Export Declaration Concerning Ultimate Consignee:* With respect to the attempted export described above, LPPAI attempted a violation of the Regulations by authorizing the filing of a Shipper's Export Declaration showing the ultimate consignee as ProClad Int. Pipelines Ltd., of Staffordshire, United Kingdom. This statement was false because the ultimate consignee was the Hyundai Engineering & Construction Co Ltd, of Dubai, the United Arab Emirates, for use in the country of ultimate destination, Iran.

WHEREAS, LPPAI has reviewed the proposed charging letter and is aware of the allegations made against it and the administrative sanctions which could be imposed against it if the allegations are found to be true;

WHEREAS, LPPAI fully understands the terms of this Agreement and the Order ("Order") that the Assistant Secretary of Commerce for Export Enforcement will issue if she approves this Agreement as the final resolution of this matter;

WHEREAS, LPPAI enters into this Agreement voluntarily and with full knowledge of its rights;

WHEREAS, LPPAI states that no promises or representations have been made to it other than the agreements and considerations herein expressed;

WHEREAS, LPPAI neither admits nor denies the allegations contained in the proposed charging letter;

WHEREAS, LPPAI wishes to settle and dispose of all matters alleged in the proposed charging letter by entering into this Agreement; and

WHEREAS, LPPAI agrees to be bound by the Order, if entered;

NOW THEREFORE, the Parties hereby agree as follows:

1. BIS has jurisdiction over LPPAI, under the Regulations, in connection with the matters alleged in the proposed charging letter.
2. The following sanctions shall be imposed against LPPAI in complete settlement of the violations of the Regulations set forth in the proposed charging letter:
 - a. LPPAI shall be assessed a civil penalty in the amount of \$50,000, of which \$25,000 shall be paid to the U.S. Department of Commerce within 30 days from the date of entry of this Order; and the remaining \$25,000 shall be paid to the U.S. Department of Commerce not later than June 30, 2006. Payment shall be made in the manner specified in the attached instructions.
 - b. The timely payment of the civil penalty agreed to in paragraph 2.a. is hereby made a condition to the granting, restoration, or continuing validity of any export license, License Exception, permission, or privilege granted, or to be granted, to LPPAI. Failure to make timely payment of the civil penalty set forth above may result in the denial of all of LPPAI's export privileges for a period of one year from the date of imposition of the penalty.
 - c. For a period five years from the date of entry of the Order, LPPAI, its successors or assigns, and, when acting for or on behalf of LPPAI, its officers, representatives, agents, or employees ("Denied Person") may not participate,

right to: (a) an administrative hearing regarding the allegations in the proposed charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if entered; (c) request any relief from the Order, if entered, including without limitation relief from the terms of a denial order under 15 C.F.R. § 764.3(a)(2); and (d) seek judicial review or otherwise contest the validity of this Agreement or the Order, if entered.

4. Upon entry of the Order, BIS will not initiate any further administrative proceeding against LPPAI in connection with any violation of the Act or the Regulations arising out of the transactions identified in the proposed charging letter.

5. BIS will make the proposed charging letter, this Agreement, and the Order, if entered, available to the public.

6. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement pursuant to Section 766.18(a) of the Regulations, no Party may use this Agreement in any administrative or judicial proceeding and the Parties shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding.

7. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, if entered, nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the U.S. Government with respect to the facts and circumstances addressed herein.

8. This Agreement shall become binding on BIS only if the Assistant Secretary of Commerce for Export Enforcement approves it by entering the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

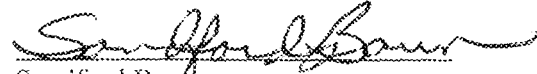
9. Each signatory affirms that he has authority to enter into this Settlement Agreement and to bind his respective party to the terms and conditions set forth herein.

BUREAU OF INDUSTRY AND SECURITY
U.S. DEPARTMENT OF COMMERCE

LPPAI, LTD.



Michael D. Turner
Director
Office of Export Enforcement



Sanford Baugh
Registered Agent

Date: 8/18/2005

Date: 8/12/05

PROPOSED CHARGING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

P.A. Inc.
6626 Gulf Freeway
Houston, Texas 77087

Attention: *Sandford Baum*
President

Dear Mr. Baum:

The Bureau of Industry and Security, U.S. Department of Commerce ("BIS"), has reason to believe that P.A. Inc. ("P.A."), of Houston, Texas, has committed five violations of the Export Administration Regulations (the "Regulations"),¹ which are issued under the authority of the Export Administration Act of 1979 (the "Act").² Specifically, BIS charges that P.A. committed the following violations:

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2005). The violations charged occurred in 2004. The Regulations governing the violations at issue are found in the 2004 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2004)). The 2005 Regulations govern the procedural aspects of this case.

² 50 U.S.C. app. §§ 2401- 2420 (2000). From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential Notices, the last of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 - 1706 (2000)) ("IEEPA"). On November 13, 2000, the Act was reauthorized by Pub. L. No. 106-508 and it remained in effect through August 20, 2001. Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp., p. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of August 6, 2004 (69 *Fed. Reg.* 48763 (Aug. 10, 2004)), continues the Regulations in effect under IEEPA.

Charge 1 (15 C.F.R. §764.2(d) - Conspiracy to Violate the Regulations)

Beginning on or about February 11, 2004 and continuing through on or about February 18, 2004, P.A. conspired and acted in concert with others, known and unknown, to do or bring about an act that violates the Regulations. The purpose of the conspiracy was to export nickel alloyed pipes, items subject to the Regulations and to the Iranian Transactions Regulations,³ from the United States to Iran without prior authorization from the Office of Foreign Assets Control, U.S. Department of the Treasury, required by Section 746.7 of the Regulations. P.A. and its co-conspirators took acts in furtherance of the conspiracy by attempting the export of nickel alloyed pipes from the United States through the United Kingdom to Iran without the required authorization. In so doing, P.A. committed one violation of Section 764.2(d) of the Regulations.

Charge 2 (15 C.F.R. § 764.2(c) - Attempted Export of Nickel Alloyed Pipes to Iran without the Required Authorization)

On or about February 18, 2004, P.A. attempted a violation of the Regulations by attempting to export nickel alloy pipes, items subject to the Regulations and to the Iranian Transactions Regulations, to Iran without prior authorization from the Office of Foreign Assets Control, U.S. Department of the Treasury as required by Section 764.7 of the Regulations. In so doing, P.A. committed one violation of Section 764.2(c) of the Regulations.

Charge 3 (15 C.F.R. § 764.2(e) - Transporting Nickel Alloy Pipes with Knowledge of a Violation of the Regulations)

With respect to the attempted export described above, P.A. transported nickel alloy pipes with the knowledge that a violation of the Regulations was about to occur or was intended to occur in connection with the nickel alloy pipes. At all times relevant hereto, P.A. knew or had reason to know that the nickel alloy pipes in question required authorization from the Office of Foreign Assets Control, U.S. Department of the Treasury, and that the required authorization had not been obtained. P.A. knew that authorization was required prior exporting the nickel alloy pipes because it had been informed by a freight forwarder of the requirement in an earlier attempt to export the pipes to Iran. In so doing, P.A. committed one violation of Section 764.2(e) of the Regulations.

Charge 4 (15 C.F.R. § 764.2(h) - Taking Actions with the Intent of Evading the Regulations)

With respect to the attempted export described above, P.A. took actions with the intent of evading the Regulations. Specifically, P.A. altered the markings on the crate of nickel alloy

³ 31 C.F.R. Part 360 (2005).

pipes that it was attempting to export, and removed markings noting that the nickel alloy pipes were being exported to Iran. P.A. altered the markings in an attempt to conceal the true ultimate destination of the items. In so doing, P.A. committed one violation of Section 764.2(h) of the Regulations.

Charge 5 (15 C.F.R. § 764.2(c) - Attempted False Statement on a Shipper's Export Declaration Concerning Ultimate Consignee)

With respect to the attempted export described above, P.A. attempted a violation of the Regulations by authorizing the filing of a Shipper's Export Declaration showing the ultimate consignee as ProClad Int. Pipelines Ltd., of Staffordshire, United Kingdom. This statement was false because the ultimate consignee was the Hyundai Engineering & Construction Co Ltd, of Dubai, the United Arab Emirates, for use in the country of ultimate destination, Iran. In so doing, P.A. committed one violation of Section 764.2(c) of the Regulations.

* * * * *

Accordingly, P.A. is hereby notified that an administrative proceeding is instituted against it pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including any or all of the following:

The maximum civil penalty allowed by law of up to \$11,000 per violation;⁴

Denial of export privileges; and/or

Exclusion from practice before BIS.

If P.A. fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter, that failure will be treated as a default. (Regulations, Sections 766.6 and 766.7). If P.A. defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to P.A. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty on each of the charges in this letter.

P.A. is further notified that it is entitled to an agency hearing on the record if P.A. files a written demand for one with its answer. (Regulations, Section 766.6). P.A. is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent it. (Regulations, Sections 766.3(a) and 766.4).

⁴ See 15 C.F.R. § 6.4(a)(2).

P.A. Inc.
Proposed Charging Letter
Page 4

The Regulations provide for settlement without a hearing. (Regulations, Section 766.18). Should P.A. have a proposal to settle this case, P.A. or its representative should transmit it through the attorney representing BIS named below.

The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, P.A.'s answer must be filed in accordance with the instructions in Section 766.5(a) of the Regulations with:

U.S. Coast Guard ALJ Docketing Center
40 S. Gay Street
Baltimore, Maryland 21202-4022

In addition, a copy of P.A.'s answer must be served on BIS at the following address:

Chief Counsel for Industry and Security
Attention: Peter R. Klason
Room H-3839
United States Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Peter R. Klason is the attorney representing BIS in this case; any communications that P.A. may wish to have concerning this matter should occur through him. He may be contacted by telephone at (202) 482-5301.

Sincerely,

Michael D. Turner
Director
Office of Export Enforcement