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

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 In the Matters of: )  
 )  
 Gold Technology Limited )  
 Flat 23C, 97 High Street )  
 Hong Kong, )  
 )  
 Hero Peak Limited )  
 Flat C, Block 4 )  
 11/F Golden Bldg )  
 145 Fuk Wa Street )  
 Sham Shui, Po, Kowloon )  
 Hong Kong, )  
 and, )  
 Room D, 11/F )  
 Fui Nam Building )  
 48-51 Connaught Road West )  
 Hong Kong, )  
 )  
 Joanna Liu )  
 Flat 23C, 97 High Street )  
 Hong Kong, )  
 )  
 Oriental Trading Corporation )  
 1<sup>st</sup> Floor, Masco Plaza )  
 Blue Area )  
 P.O. Box 2879 )  
 Islamabad, Pakistan, )  
 )  
 Portson Trading Limited )  
 Room D, 8/F )  
 217-223 Tung Choi Street )  
 Mongkok, Kowloon )  
 Hong Kong, )  
 and, )  
 Room 709 Wing Shan Tower )  
 173 Des Voeux Road Central )  
 Hong Kong, )  
 and, )

Room 2208, 22/F )  
 118 Connaught Road West )  
 Hong Kong, )  
 )  
 And, )  
 )  
 Zhenke International Trading Co. Ltd. )  
 Tianjin Port Free Trade Zone )  
 Room 801, Gold Beauty Building No. 99 )  
 Haibain 9 Road, TPFTZ )  
 Tianjin, Peoples Republic of China )  
 )  
 Respondents )

**ORDER RENEWING TEMPORARY DENIAL ORDER AS TO GOLDTECHNOLOGY LIMITED, HERO PEAK LIMITED, JOANNA LIU, ORIENTAL TRADING CORPORATION, PORTSON TRADING LIMITED, and ZHENKE INTERNATIONAL TRADING CO. LTD.**

Pursuant to Section 766.24 of the Export Administration Regulations ("EAR"), the Bureau of Industry and Security ("BIS"), U.S. Department of Commerce, through its Office of Export Enforcement ("OEE"), has requested that I renew for 180 days an Order temporarily denying export privileges of the following:

- (1) GOLD TECHNOLOGY LIMITED, Flat 23C, 97 High Street, Hong Kong;
- (2) HERO PEAK LIMITED, Flat C, Block 4, 11/F Golden Bldg, 145 Fuk Wa Street, Sham Shui, Po, Kowloon, Hong Kong and Room D, 11/F, Fui Nam Building, 48-51 Connaught Road West, Hong Kong;
- (3) JOANNA LIU, Flat 23C, 97 High Street, Hong Kong;
- (4) ORIENTAL TRADING CORPORATION, 1st Floor, Masco Plaza, Blue Area, P.O. Box 2879, Islamabad, Pakistan;

(5) PORTSON TRADING LIMITED, Room D, 8/F, 217-223 Tung Choi Street, Mongkok, Kowloon, Hong Kong and Room 709 Wing Shan Tower, 173 Des Voeux Road Central, Hong Kong, and Room 2208, 22/F, 118 Connaught Road West, Hong Kong; and

(6) ZHENKE INTERNATIONAL TRADING CO. LTD. Tianjin Port Free Trade Zone, Room 801, Gold Beauty Building No. 99, Haibain 9 Road, TPFTZ, Tianjin, Peoples Republic of China

(hereinafter collectively referred to as the "Respondents").

On March 8, 2005, I found that the Respondents<sup>1</sup> had conspired to undertake acts that violated the EAR, that such violations had been deliberate and covert, and that there was a strong likelihood of future violations, particularly given the nature of the transactions and the elaborate steps that had been taken by the Respondents to avoid detection by the U.S. Government while knowing that their actions were in violation of the EAR. 70 FR 12442 (Mar. 14, 2005). This finding was based on evidence presented by BIS that indicated that Respondents had conspired with others, known and unknown, to cause items subject to the EAR to be illegally exported to Pakistan, that they caused exports of items controlled for nuclear non-proliferation reasons to Pakistan with knowledge that violations of the EAR would occur, and that they took actions intending to violate the EAR.

BIS continues to investigate this matter and believes that all of the facts found in the original Order continue to justify the renewal of the Order, especially given the nature of the transactions and the steps that have been taken by Respondents to avoid detection by the U.S.

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<sup>1/</sup> Sunford Trading Limited, Room 2208, 22/F, 118 Connaught Road West, Hong Kong, was included as a Respondent in the initial Order, but was not included in the request for renewal of the Order because of an unrelated three year denial order on the company that became effective on August 25, 2005 (70 FR 49910 Aug., 25, 2005).

Government while knowing their actions were in violation of the EAR. BIS believes evidence described in the initial request for the Order, including evidence that indicates the Respondents intend to continue acquiring or purchasing significant amounts of U.S. origin items, supports this Order.

Based on the evidence submitted by BIS, I find that renewal of the Order naming Respondents is necessary, in the public interest, to prevent an imminent violation of the EAR. A copy of the request for renewal of this Order was served upon Respondents in accordance with the requirements of 15 C.F.R. § 766.24 of the EAR, and no responses were received in opposition to this request within the applicable time period described in that section.

IT IS THEREFORE ORDERED:

FIRST, that the Respondents, at the addresses listed above, and their successors and assigns and when acting on behalf of any of the Respondents, their officers, employees, agents or representatives, (collectively, the "Denied Persons") may not, directly or indirectly, participate 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 Export Administration Regulations ("EAR"), or in any other activity subject to the EAR 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 EAR, or in any other activity subject to the EAR;

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 EAR, or in any other activity subject to the EAR.

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

A. Export or reexport to or on behalf of the Denied Persons any item subject to the EAR;

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 EAR that has been or will be exported from the United States, including financing or other support activities related to a transaction whereby the Denied Persons 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 Persons of any item subject to the EAR that has been exported from the United States;

D. Obtain from the Denied Persons in the United States any item subject to the EAR 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 EAR that has been or will be exported from the United States and which is owned, possessed or controlled by the Denied Persons, or service any item, of whatever origin, that is owned, possessed or controlled by the Denied Persons if such service involves the use of any item subject to

the EAR that has been or will be exported from the United States. For purposes of this paragraph, servicing means installation, maintenance, repair, modification or testing.

THIRD, that after notice and opportunity for comment as provided in section 766.23 of the EAR, any other person, firm, corporation, or business organization related to any of the Respondents 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 this Order.


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

In accordance with the provisions of Section 766.24(e) of the EAR, the Respondents may, at any time, appeal this Order by filing a full written statement in support of the appeal with the Office of the Administrative Law Judge, U.S. Coast Guard ALJ Docketing Center, 40 South Gay Street, Baltimore, Maryland 21202-4022.

In accordance with the provisions of Section 766.24(d) of the EAR, BIS may seek renewal of this Order by filing a written request not later than 20 days before the expiration date. The Respondents may oppose a request to renew this Order by filing a written submission with the Assistant Secretary for Export Enforcement, which must be received not later than seven days before the expiration date of the Order.

A copy of this Order shall be served on the Respondents, and shall be published in the *Federal Register*.

This Order is effective on September 11, 2005 and shall remain in effect for 180 days.

  
WENDY WYSONG  
Deputy Assistant Secretary of Commerce  
for Export Enforcement

Entered this 9th day of September, 2005.