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

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In the Matter of:

Terry Tengfang Li 1132 Seagull Lane Cherry Hill, NJ 08054

Respondent.

## ORDER RELATING TO TERRY TENGFANG LI (AKA "TERRY LI")

The Bureau of Industry and Security, U.S. Department of Commerce ("BIS") has notified

Terry Tengfang Li (hereinafter referred to as "Terry Li") of its intention to initiate an

administrative proceeding against Terry Li, President of Universal Technology, Inc., in his

individual capacity, pursuant to Section 766.3 of the Export Administration Regulations

(currently codified at 15 C.F.R. Parts 730-774 (2006)) ("Regulations"),<sup>1</sup> and Section 13(c) of the

Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) ("Act"),<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> The violations charged are alleged to have occurred from 2000 through 2004. The Regulations governing the violations at issue are found in the 2000 - 2004 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2000-2004)). The 2006 Regulations set forth the procedures that apply to this matter.

<sup>&</sup>lt;sup>2</sup> 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 FR 45273 (August 5, 2005)), has continued the Regulations in effect under the IEEPA.

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by issuing a proposed charging letter to Terry Li that alleged that Terry Li committed 49 violations of the Regulations. Specifically, the charges are:

- 17 Violations of 15 C.F.R. §764.2(a) Exporting Electronic Components to the People's Republic of China Without the Required Licenses: On 17 occasions, between on or about July 21, 2000 and on or about April 21, 2004, Terry Li engaged in conduct prohibited by the Regulations by exporting or causing to be exported electronic components classified under Export Control Classification Number ("ECCN") 3A001 to the People's Republic of China ("PRC") without the Department of Commerce (the "Department") licenses required by Section 742.4 of the Regulations.
- 2. 17 Violations of 15 C.F.R. §764.2(e) Exporting Electronic Components to the People's Republic of China With Knowledge That Violations Would Occur: In connection with the transactions described above, Terry Li caused the export of electronic components to the PRC with knowledge that violations of the Regulations would occur. Specifically, Terry Li had knowledge that Department of Commerce licenses were required to export the electronic components from the United States to the PRC and Terry Li caused the export of the items with knowledge that such licenses would not be obtained.
- 3. 15 Violations of 15 C.F.R. §764.2(e) False Statement on Shipper's Export
   Declarations Concerning Authority to Export: In connection with 15 exports of

Order Terry Li Page 3 of 6

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electronic components subject to the regulations to the PRC described above, Terry Li made false statements to the U.S. Government in connection with the submission of export control documents. Specifically Terry Li filed or caused to be filed with the U.S. Government Shipper's Export Declarations stating that the exports did not require Department of Commerce licenses ("NLR" or "No License Required"). These statements were false because licenses were required to export these items.

WHEREAS, BIS and Terry Li 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 of the terms of such Settlement Agreement;

#### IT IS THEREFORE ORDERED:

FIRST, that for a period of 20 years from the date of entry of this Order, Terry Tengfang Li (aka "Terry Li"), 1132 Seagull Lane, Cherry Hill, NJ 08054, and, when acting for or on behalf of Terry Li, his representatives, agents, assigns or employees ("Denied Person") 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 Regulations, or in any other activity subject to the Regulations, including, but not limited to:

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- 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.

SECOND, 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;

#### Order Terry Li Page 5 of 6

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- 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.

THIRD, 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 Terry Li 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.

FOURTH, 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. Order Terry Li Page 6 of 6

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

SIXTH, that this Order shall be served on the Denied Person, and shall be published in the *Federal Register*.

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

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Darryl Jackson Assistant Secretary of Commerce for Export Enforcement

Entered this 27th day of <u>Jm</u> 2006.

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

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In the Matter of:

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> Terry Tengfang Li 1132 Seagull Lane Cherry Hill, NJ 08054

> > Respondent.

# SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") is made by and between Respondent, Terry

Tengfang Li, acting as President of Universal Technology, Inc., in his individual capacity

(referred to hereinafter as "Terry Li"), 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 (2006))

("Regulations"),<sup>1</sup> issued pursuant to the Export Administration Act of 1979, as amended (50

U.S.C. app. §§ 2401-2420 (2000)) ("Act"),<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> The violations charged are alleged to have occurred from 2000 through 2004. The Regulations governing the violations at issue are found in the 2000 - 2004 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2000-2004)). The 2006 Regulations set forth the procedures that apply to this matter.

<sup>&</sup>lt;sup>2</sup> 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 FR 45273 (August 5, 2005)), has continued the Regulations in effect under the IEEPA.

Settlement Agreement Terry Tengfang Li Page 2 of 7

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WHEREAS, BIS has notified Terry Li of its intention to initiate an administrative proceeding against Terry Li, pursuant to the Act and the Regulations;

WHEREAS, BIS has issued a proposed charging letter to Terry Li that alleged that Terry Li committed 49 violations of the Regulations, specifically:

- 17 Violations of 15 C.F.R. §764.2(a) Exporting Electronic Components to the People's Republic of China Without the Required Licenses: On 17 occasions, between on or about July 21, 2000 and on or about April 21, 2004, Terry Li engaged in conduct prohibited by the Regulations by exporting or causing to be exported electronic components classified under Export Control Classification Number ("ECCN") 3A001 to the People's Republic of China ("PRC") without the Department of Commerce (the "Department") licenses required by Section 742.4 of the Regulations.
- 2. 17 Violations of 15 C.F.R. §764.2(e) Exporting Electronic Components to the People's Republic of China With Knowledge That Violations Would Occur: In connection with the transactions described above, Terry Li caused the export of electronic components to the PRC with knowledge that violations of the Regulations would occur. Specifically, Terry Li had knowledge that Department of Commerce licenses were required to export the electronic components from

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Settlement Agreement Terry Tengfang Li Page 3 of 7

the United States to the PRC and Terry Li caused the export of the items with knowledge that such licenses would not be obtained.

3. 15 Violations of 15 C.F.R. §764.2(e) - False Statement on Shipper's Export Declarations Concerning Authority to Export: In connection with 15 exports of electronic components subject to the Regulations to the PRC described above, Terry Li made false statements to the U.S. Government in connection with the submission of export control documents. Specifically Terry Li filed or caused to be filed with the U.S. Government Shipper's Export Declarations stating that the exports did not require Department of Commerce licenses ("NLR" or "No License Required"). These statements were false because licenses were required to export these items.

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

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

WHEREAS, Terry Li enters into this Agreement voluntarily and with full knowledge of his rights;

Settlement Agreement Terry Tengfang Li Page 4 of 7

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WHEREAS, the parties enter into this agreement having taken into consideration the plea agreement that Terry Li has agreed to enter into with the U.S. Attorney for the District of New Jersey in the related criminal case (case number 04-551) ("plea agreement");

WHEREAS, Terry Li states that no promises or representations have been made to him other than the agreements and considerations herein expressed except those that were made in connection with the plea agreement;

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

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

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

NOW THEREFORE, the Parties hereby agree as follows:

1. BIS has jurisdiction over Terry Li, under the Regulations, in connection with the matters alleged in the proposed charging letter.

2. The following sanction shall be imposed against Terry Li in complete settlement of the violations of the Regulations set forth in the proposed charging letter:

a. For a period of 20 years from the date of entry of the Order, Terry Tengfang Li
(aka "Terry Li"), 1132 Seagull Lane, Cherry Hill, NJ 08054, and, when acting for
or on behalf of Terry Li, his assigns, representatives, agents, or employees
("Denied Person") may not participate, directly or indirectly, in any way in any

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Settlement Agreement Terry Tengfang Li Page 5 of 7

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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:

- i. Applying for, obtaining, or using any license, License Exception, or export control document;
- ii. 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
- iii. 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.

3. Subject to the approval of this Agreement pursuant to paragraph 8 hereof, Terry Li hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violations of this Agreement or the Order, if entered), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any 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 Settlement Agreement Terry Tengfang Li Page 6 of 7

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. BIS agrees that, upon entry of the Order, it will not initiate any further administrative proceeding against Terry Li 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 United States 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. Settlement Agreement Terry Tengfang Li Page 7 of 7

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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

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Michael D. Turner Director, Office of Export Enforcement

Date: 06/19/06

TERRY TENGFANG LI

Terry Tengfang Li Date: Jane 2, 2006

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Terry Tengfang Li 1132 Seagull Lane Cherry Hill, NJ 08054

Dear Mr. Li:

The Bureau of Industry and Security, U.S. Department of Commerce ("BIS"), has reason to believe that you, Terry Tengfang Li (hereinafter "Terry Li"), of Cherry Hill, NJ, acting as President of Universal Technology, Inc., in your individual capacity, have committed 49 violations of the Export Administration Regulations (the "Regulations"),<sup>1</sup> which are issued under the authority of the Export Administration Act of 1979 (the "Act").<sup>2</sup> Specifically, BIS charges that Terry Li committed the following violations:

## Charges 1-17 (15 C.F.R. §764.2(a) - Exporting Electronic Components to the People's Republic of China Without the Required Licenses)

On 17 occasions, between on or about July 21, 2000 and on or about April 21, 2004, Terry Li engaged in conduct prohibited by the Regulations by exporting or causing to be exported electronic components classified under Export Control Classification Number ("ECCN") 3A001 to the People's Republic of China ("PRC") without the Department of Commerce (the "Department") licenses required by Section 742.4 of the Regulations. *See* the Schedule of Violations, which is enclosed herewith and incorporated herein by reference. In so doing, Terry Li committed 17 violations of Section 764.2(a) of the Regulations.

<sup>&</sup>lt;sup>1</sup> The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2004). The violations charged occurred from 2000 through 2004. The Regulations governing the violations at issue are found in the 2000 - 2004 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2000-2004)). The 2004 Regulations govern the procedural aspects of this case.

<sup>&</sup>lt;sup>2</sup> 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.

Terry Tengfang Li Proposed Charging Letter Page 2

## Charges 18-34 (15 C.F.R. §764.2(e) - Exporting Electronic Components to the People's Republic of China With Knowledge That Violations Would Occur)

In connection with the transactions described in charges 1-17 above, Terry Li caused the export of electronic components to the PRC with knowledge that violations of the Regulations would occur. Specifically, Terry Li had knowledge that Department of Commerce licenses were required to export the electronic components from the United States to the PRC and Terry Li caused the export of the items with knowledge that such licenses would not be obtained. These violations are further described in the attached Schedule of Violations, which is incorporated herein by reference. In so doing, Terry Li committed 17 violations of Section 764.2(e) of the Regulations.

## Charges 35-49 (15 C.F.R. § 764.2(g) - False Statement on Shipper's Export Declarations Concerning Authority to Export)

In connection with the transactions described in charges 2-12, and 14-17 above, Terry Li made false statements to the U.S. Government in connection with the submission of an export control document. Specifically Terry Li filed or caused to be filed with the U.S. Government Shipper's Export Declarations (SED) stating that the exports did not require Department of Commerce licenses ("NLR" or "No License Required"). These statements were false because licenses were required to export these items. These violations are further described in the attached Schedule of Violations, which is incorporated herein by reference. In so doing, Terry Li committed 15 violations of Section 764.2(g) of the Regulations.

Accordingly, Terry Li is hereby notified that an administrative proceeding is instituted against him 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 \$120,000 per violation;<sup>3</sup>

Denial of export privileges; and/or

Exclusion from practice before BIS.

<sup>&</sup>lt;sup>3</sup> Pursuant to 15 C.F.R. § 6.4(a)(7) the maximum penalty for violations 5, 6, 22, 23, 38, and 39 is \$120,000 per violation. Pursuant to 15 C.F.R. § 6.4(a)(2), the maximum penalty for all other violations alleged herein is \$11,000 per violation.

Terry Tengfang Li Proposed Charging Letter Page 3

If Terry Li 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 Terry Li defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Terry Li. 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.

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

The Regulations provide for settlement without a hearing. (Regulations, Section 766.18). Should Terry Li have a proposal to settle this case, Terry Li or his 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, Terry Li'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 Terry Li's answer must be served on BIS at the following address:

Chief Counsel for Industry and Security Attention: Glenn H. Kaminsky Room H-3839 United States Department of Commerce 14th Street and Constitution Avenue, N.W. Washington, D.C. 20230 Terry Tengfang Li Proposed Charging Letter Page 4

Glenn H. Kaminsky is the attorney representing BIS in this case; any communications that Terry Li may wish to have concerning this matter should occur through him. He may be contacted by telephone at (202) 482-5301.

Sincerely,

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Michael D. Turner Director Office of Export Enforcement

Enclosure

Terry Li Schedule of Violations

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L	Charges	Part Number	aty .	UTI Sale Value \$	ECCN / LD #	UTI Invoice #	UTI Contract #	Ship To:	Approx. Date	Air Waybill #
		SMJ320C25GBM	35	\$10,241.00	3A001				7/21/2000	
	1, 18	SMJ320C30GBM	15	\$14,520.00	3A001	A042	2000EMCR/470348M026US	Shaanxi Int'l Freight	(no SED)	999-JFK-/1698583
	-	SMJ320C50FAM	84	\$24,578.40	3A001					
	2, 19, 35	SMJ320C50GFAM	16	\$4,681.60	3A001	A074	2000EMCR/470348M026US	Shaanxi Int'I Freight	10/8/2000	999-JFK-7177440
1	3, 20, 36	SMJ320C40GFM50 (	348	\$374,100.00	3A001	A081	00US11IDF52011886	Sinotrans Jiangsu Airfreight	10/14/2000	999-JFK-71826495
	4, 21, 37	SMJ320C40GFM50	52	\$55,900.00	3A001	A085	00US11IDF52011886	Sinotrans Jiangsu Airfreight	11/8/2000	999-JFK-71864656
		IDT7133LA70GB	21	\$2,494.80	3A001	RUDR	2000EM/470348M063US	XRINT Eng. &	2/2/2001	999-JFK-71914636
	5, 22, 38	SMJ320C25GBM	48	\$13,560.48	3A001			Trading		
$\square$		AD558TD/883B	50	\$3,156.50	3A001	B024	2000FM/470348M082US	Sinotrans N.W.	3/21/2001	999-JFK-71914673
	0, 23, 39	AD673SD/883B	39	\$5,619.90	3A001	-		Airfreight		
	7, 24, 40	SMJ320C25GBM	20	\$5,397.00	3A001	B122	A2001XSD421D/US	Sinotrans N.W. Airfreight	10/31/2001	999-JFK-72625733
	8, 25, 41	SMJ320C40GFM50	32	\$35,072.00	3A001	C100	02USBJ/E023D189M	Sinotrans Jiangsu Airfreight	11/27/2002	999JFK-73888883
		AD678TD	31	\$6,632.14	3A001	D003	02XSD39.1921US/H	Xían Airport	1/17/2003	999-JFK-73985203
	9, 20, 42	AD7528SQ	18	\$475.20	3A001			_		
	10, 27, 43	AD673SD/883B	12	\$1,484.52	3A001	D018	02XSD39J946US/H	China Nat'l Foreign Trade Trans. Corp.	3/12/2003	999-JFK75219314
	11, 28, 44	ACTS512K32N- 017P7Q	20	\$13,406.20	3A001	D021	22KMZA/475145MR	Shenzhen Shenyuan Traiding	3/21/2003	999-JFK-75258923
	12, 29, 45	CY7	200	\$10,042.00	3A001	D035	03XSD33J718US/H	Sinotrans N.W. Airfreight	5/23/2003	999-JFK-75556751
	13, 30	AD10242TZ/883B	60	\$59,700.00	3A001	D048	03XSD33J735US/Y	China Xinshidai Co.	7/21/2003 (No SED)	999-JFK-75811072
	14, 31, 46	SMJ320C40GFM50	24	\$26,304.00	3A001	D054	03USBJ/E023D086M	China Nat'l Electronics	8/9/2003	999-JFK75811083
	15, 32, 47	IDT7132LA55L48B	34	\$2,275.62	3A001	D083	23KMZA/475279US	Shenzhen Shenyuan Traiding	11/4/2003	999-JFK-66065591

16, 33, 48	AD10242TZ	55	55 \$24,035.00	3A001	D048	03XSD33J7053US/Y	China Xinshidai Co. 2/13/2004 999-JFK-76767876	2/13/2004	999-JFK-76767876
17, 34, 49	AD573SD/883	5	\$1,226.40	3A001	E031	03XSD33J7045US/H	China Xinshidai Co. 4/21/2004 999-JFK-76871701	4/21/2004	999-JFK-76871701

Totals: 1,219 items at \$694,902.76