

VOLUNTARY SELF DISCLOSURE CASES
FY2006

(28 VSD Cases)

ORDER DATE	CASE NAME	CHARGES	SECTIONS VIOLATED	RESULT	PENALTY BREAKDOWN
09/07/06	In the Matter of Cerac, Inc.	Exported specialty inorganic materials to India, Israel, the People's Republic of China, Taiwan and Thailand and exported quantities of Iron and Selenium to the Inter University Consortium in India, an organization which was then on the Entity List without the required licenses and with knowledge that violations would occur; made false or misleading statements on SEDs concerning authority to export and with knowledge that violations would occur	764.2(a) [30] 764.2(e) [38] 764.2(g) [8]	Settlement Agreement - civil penalty of \$297,000	maximum fine was \$836,000 avg: \$3900 fine was 36% of the maximum partial VSD
08/16/06	In the Matter of Spectrum Laboratory Products, Inc.	Exported trolamine and phosphorus oxychloride to Israel and Hong Kong without the required licenses	764.2(a) [4]	Settlement Agreement - civil penalty of \$20,000	maximum fine was \$44,000 avg: \$5000 fine was 45% of the maximum full VSD

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08/10/06	In the Matter of Equistar Chemicals, LP	Exported triethanolamine to Mexico without the required export licenses	764.2(a) [13]	Settlement Agreement - civil penalty of \$39,650	maximum fine was \$143,000 avg: \$3050 fine was 28% of the maximum full VSD
08/04/06	In the Matter of GE Nuclear Energy, Inc.	Exported radiation hardened cameras to Taiwan without the required licenses; made false statement on SEDs	764.2(a) [4] 764.2(g) [13]	Settlement Agreement - civil penalty of \$56,000	maximum fine was \$187,000 avg: \$3294.12 fine was 30% of the maximum full VSD
08/02/06	In the Matter of Varian Inc. (Varian Switzerland)	Reexported computer and associated software to Syria without the required licenses; made false statements as to the authority to export on SED and with knowledge that a violation would occur	764.2(a) [1] 764.2(e) [1]	Settlement Agreement - civil penalty of \$8,800	maximum fine was \$22,000 avg: \$4400 fine was 40% of the maximum full VSD
08/02/06	In the Matter of Varian Inc. (Varian Neth.)	Aided in the export and reexport of computers and associated software and ethernet switches to Syria without the required licenses and with knowledge that violations would occur	764.2(b) [3] 764.2(a) [4] 764.2(e) [2]	Settlement Agreement - civil penalty of \$39,600	maximum fine was \$99,000 avg: \$4400 fine was 40% of the maximum full VSD

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08/02/06	In the Matter of Varian, Inc. (Varian U.S.)	Exported computers and associated software to Syria without the required licenses; made false statements as to the authority to export on SED	764.2(a) [3] 764.2(g) [3]	Settlement Agreement - civil penalty of \$26,400	maximum fine was \$66,000 avg: \$4400 fine was 40% of the maximum full VSD
06/20/06	In the Matter of Arrow Electronics, Inc.	Exported electronic and computer component to Russia without the required licenses	764.2(a) [5]	Settlement Agreement - civil penalty of \$20,000	maximum fine was \$55,000 avg: \$4000 fine was 36% of the maximum full VSD
05/23/06	In the Matter of Dresser Italia S.r.l.	Caused exports and reexported various oil industry-related items to Libya and Iran without the required U.S. Government authorization and with knowledge that violations would occur	764.2(b) [51] 764.2(e) [60] 764.2(a) [9]	Settlement Agreement - civil penalty of \$820,000	maximum fine was \$1,320,000 avg: \$6833.33 fine was 62% of the maximum full VSD

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05/23/06	In the Matter of DI U.K. Ltd.	Reexported and caused an export of various oil industry-related items to Libya without the required U.S.Government authorization	764.2(a) [6] 764.2(a) [31]	Settlement Agreement - civil penalty of \$122,100	maximum fine was \$407,000 avg: \$3,300 fine was 30% of the maximum full VSD
05/23/06	In the Matter of Dresser, Inc.	Exported various oil industry-related items to Libya and Iran without the required U.S. Government authorization	764.2(a) [33]	Settlement Agreement - civil penalty of \$110,000	maximum fine was \$363,000 avg: \$3,333.33 fine was 30% of the maximum full VSD
05/23/06	In the Matter of Dresser Europe GmbH	Caused an export and reexported of various oil industry-related items from Germany to Libya without the required U.S. Government authorization and with knowledge that a violation would occur	764.2(b) [2] 764.2(e) [3] 764.2(a) [1]	Settlement Agreement - civil penalty of \$19,800	maximum fine was \$66,000 avg: \$3,300 fine was 30% of the maximum full VSD
05/23/06	In the Matter of Dresser Instruments S.A. de C.V.	Aided and abetted unlicensed reexports of pressure gauges and other items to Cuba	764.2(b) [4]	Settlement Agreement - civil penalty of \$12,000	maximum fine was \$44,000 avg: \$3,000 fine was 27% of the maximum full VSD

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05/23/06	Dresser International, Inc.	Caused a reexport of various oil industry-related items to Iraq without the required U.S. Government authorization and with knowledge that a violation would occur	764.2(b) [1] 764.2(e) [1]	Settlement Agreement - civil penalty of \$6,600	maximum fine was \$22,000 avg: \$3,300 fine was 30% of the maximum full VSD
05/23/06	In the Matter of DI Canada, Inc.	Reexported and caused an export of various oil-industry-related items from Canada to Libya without the required U.S. Government authorization	764.2(a) [1] 764.2(b) [1]	Settlement Agreement - civil penalty of \$6,600	maximum fine was \$22,000 avg: \$3,300 fine was 30% of the maximum full VSD
05/23/06	In the Matter of International Valves Ltd.	Reexported TK Spare Parts from the United Kingdom to Libya without the required U.S. Government authorization	764.2(a) [1]	Settlement Agreement - civil penalty of \$3,300	maximum fine was \$11,000 avg: \$3,300 fine was 30% of the maximum full VSD
05/23/06	In the Matter of UGS Corporation	Exported computer software or software updates to entity lists organizations in India and China without the required licenses	764.2(a) [15]	Settlement Agreement - civil penalty of \$57,750	maximum fine was \$165,000 avg: \$3,850 fine was 35% of the maximum full VSD

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05/12/06	In the Matter of Ingersoll-Rand Co., Ltd.	Exported diaphragm pumps to India, Israel, the People's Republic of China, Taiwan and Russia without the required licenses and with knowledge that violations would occur; made false statements on SEDs	764.2(a) [28] 764.2(e) [28] 764.2(g) [24]	Settlement Agreement - civil penalty of \$680,000 - after filing of charging letter	maximum fine was \$880,000 avg: \$8,500 fine was 77% of the maximum partial VSD
05/12/06	In the Matter of Extreme Networks, Inc.	Exported computer network switching hardware to Beijing University of Aeronautics and Astronautics of Beijing, China, an organization on BIS's Entity List and with knowledge that a violation would occur; made false statements concerning authority to export and the ultimate consignee and with knowledge that violations would occur	764.2(a) [1] 764.2(e) [3] 764.2(g) [2]	Settlement Agreement - civil penalty of \$35,000	maximum fine was \$66,000 avg: \$5833.33 fine was 53% of the maximum full VSD
05/10/06	In the Matter of Plains All American Pipeline, L.P.	Exported crude oil to Canada contrary to BIS licenses issued and with knowledge that violations would occur	764.2(a) [15] 764.2(e) [15]	Settlement Agreement - civil penalty of \$82,500	maximum fine was \$330,000 avg: \$2750.00 fine was 25% of the maximum full VSD

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04/28/06	In the Matter of Hexcel Corporation	Deemed export of technology to Taiwanese National in the United States without the required license; exported carbon fabric and carbon fiber to various destinations without the required licenses; made false or misleading representation, statement, or certification on export control document	764.2(a) [21] 764.2(g) [1]	Settlement Agreement - civil penalty of \$203,400 [4 violations while EAA was in effect]	maximum fine was \$678,000 4 EAA violations avg: \$3,300 per violation under IEEPA and \$36,000 per violation under EAA fine was 30% of the maximum full VSD
04/20/06	In the Matter of Toxin Technology, Inc.	Exported various toxins, including staphylococcal enterotoxins and shiga toxins to various countries including Japan, France, and the United Kingdom without the required licenses; failed to retain export control documents	764.2(a) [92] 764.2(i)[1]	Settlement Agreement - civil penalty of \$255,750, \$225,750 suspended	maximum fine was \$1,023,000 avg: \$2750 fine was 25% of the maximum full VSD
03/17/06	Bear Basin Outfitters	Exported optical sighting devices to various countries, including Canada, Sweden, and Switzerland without the required licenses	764.2(a) [64]	Settlement Agreement - civil penalty of \$8,000	maximum fine was \$704,000 avg: \$125.00 fine was 1% of the maximum full VSD

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03/16/06	Nvidia Corporation	Deemed export of technology to Iranian National in the United States without the required license	764.2(a) [1]	Settlement Agreement - civil penalty of \$4,500	maximum fine was \$11,000 avg: \$4,500 fine was 41% of the maximum full VSD
12/28/05	Becton, Dickinson and Company	Exported biomedical research products, labware for tissue culture and fluid handling and reagent systems for life sciences research to organizations in India on the Entity List without the required licenses	764.2(a) [36]	Settlement Agreement - civil penalty \$123,000; perform audit of internal compliance program within 24 months	maximum fine was \$396,000 avg: \$3416.67 fine was 31% of the maximum full VSD
12/22/05	The CIT Group, Inc.	Exported oscilloscopes and signal generators to various end users in Israel and the Philippines without the required licenses; made false or misleading representations, statements, or certifications on SED	764.2(a) [15] 764.2(g) [2]	Settlement Agreement - civil penalty of \$74,800	maximum fine was \$187,000 avg: \$4,400 fine was 40% of the maximum full VSD

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11/22/05	Carrier Access Corporation	Exported telecommunications devices and technical information to Iran without authorization from OFAC and with knowledge that violations would occur; failed to file SED	764.2(a) [11] 764.2(e) [5]	Settlement Agreement - civil penalty of \$61,600	maximum fine was \$176,000 avg: \$3,850 fine was 35% of the maximum full VSD
10/24/05	Cymer, Inc.	Deemed exports to foreign nationals from Russia and the People's Republic of China; exported a Deep Ultra Violet light source to Taiwan without the required license; made false statement to the U.S. Government in connection with an export	764.2(a) [3] 764.2(g) [2]	Settlement Agreement - civil penalty of \$19,250	maximum fine was \$55,000 avg: \$3,850 fine was 35% of the maximum full VSD