

VOLUNTARY SELF DISCLOSURE CASES

FY2005

(18 Cases)

ORDER DATE	CASE NAME	CHARGES	SECTIONS VIOLATED	RESULT	PENALTY BREAKDOWN
10/18/04	In the Matter of GE Medical Systems Ultrasound and Primary Care Diagnostics, Inc., successor to Lunar Europe, N.V.	Caused the export of bone densitometer equipment to Iran without prior authorization from OFAC	764.2(b)[13]	Settlement Agreement - civil penalty of \$32,500	maximum fine was \$143,000 avg: \$2,500 fine was 22% of the maximum full VSD
11/09/04	In the Matter of PartMiner, Inc.	Exported electronic components to organizations in India on the BIS Entity List without the required licenses; failed to file SED; made false statements on SED	764.2(a)[14] 764.2(g)[4]	Settlement Agreement - civil penalty of \$50,000	maximum fine was \$198,000 avg: \$2,778 per violation fine was 25% of maximum fine full VSD

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11/10/04	In the Matter of Fujitsu Network Communications, Inc.	Engaged in deemed exports of controlled technology without required licenses	764.2(a)[21]	Settlement Agreement - civil penalty of \$125,000	<p>maximum fine was \$231,000</p> <p>avg: \$6,000 per violation</p> <p>fine was 54% of maximum fine</p> <p>full VSD (deemed exports of NS controlled technology to PRC)</p>
12/07/04	In the Matter of Criticare Systems, Inc.	Exported medical equipment from the United States through the United Kingdom to Iran without the required authorization; failed to submit required SED	764.2(a) [20]	Settlement Agreement - civil penalty of \$45,000	<p>maximum fine was \$220,000</p> <p>avg: \$2,250</p> <p>fine was 20% of maximum fine</p> <p>Full VSD</p>
12/23/04	In the Matter of Lam Research Singapore Pte. Ltd.	Reexported U.S. origin pressure transducers from Singapore to Malaysia without the required licenses and with knowledge that a violation would occur	764.2(a) [4] 764.2(e) [4]	Settlement Agreement - civil penalty of \$40,000	<p>maximum fine was \$88,000</p> <p>avg: \$5,000 per violation</p> <p>fine was 45% of maximum fine</p> <p>full VSD</p>

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03/07/05	In the Matter of L-3 Communications Corporation	Exported a mobile cargo x-ray system to The Netherlands without the required license and with knowledge that a violation would occur; made false statements on SED concerning authority to export	764.2(a) [1] 764.2(g) [3]	Settlement Agreement - civil penalty of \$33,000; perform audits of all exports involving items subject to Regulations that occurred during January 1, 2005 through December 31, 2005, not later than February 1, 2006	maximum fine was \$44,000 avg: \$8,250 per violation fine was 75% of maximum fine VSD (aggravating factors not public)
03/14/05	In the Matter of Rockwell Automation, Inc.	Exported a balancing machine to Malaysia, Mexico, Venezuela without obtaining the required license; made false statements on SED concerning authority to export; exported computer software and accessories to Bharat Heavy Electrical Limited, Hardwar, an organization on the BIS Entity List, without the required license; reexported software, data collectors and vibration monitors and associated parts from the United Kingdom to organizations listed on the Entity List without the required licenses	764.2(a) [14] 764.2(g) [3]	Settlement Agreement - civil penalty of \$46,750	maximum fine was \$187,000 avg: \$2,750 per violation fine was 25% of maximum fine full VSD
03/31/05	In the Matter of Teledyne Technologies, Inc.	Exported technical information on proposed power plants to Bharat Heavy Electricals Ltd ("BHEL") in New Delhi, India, an organization on the BIS Entity List without the required licenses	764.2(a) [3]	Settlement Agreement - civil penalty of \$16,500	maximum fine was \$33,000 avg: \$5,500 fine was 50% of maximum full VSD

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06/01/05	In the Matter of Mobil International Petroleum Corporation	Caused the reexport of Dell servers and labtop computers from England to Sudan, through Egypt without the required licenses	764.2(b) [3]	Settlement Agreement - civil penalty of \$12,000	maximum fine was \$33,000 avg: \$4,000 fine was 36% of maximum full VSD
06/01/05	In the Matter of Mobil Services Company, Ltd.	Aided the reexport of Dell servers and labtop computers from England to Sudan, through Egypt without the required licenses; failed to retain export control documents	764.2(b) [3] 764.2(i) [1]	Settlement Agreement - civil penalty of \$19,500	maximum fine was \$44,000 avg: \$4,875 fine was 44% of maximum full VSD
06/01/05	In the Matter of ExxonMobil Egypt (S.A.E.)	Aided the reexport of Dell servers and labtop computers from England to Sudan, through Egypt without the required licenses; failed to retain export control documents	764.2(b) [3] 764.2(i) [1]	Settlement Agreement - civil penalty of \$18,000	maximum fine was \$44,000 avg: \$4,500 fine was 40% of maximum full VSD
06/21/05	In the Matter of Elan Pharmaceuticals, Inc.	Exported conotoxin to Belgium without the required licenses and with knowledge that violations would occur	764.2(a) [4] 764.2(e) [4]	Settlement Agreement - civil penalty of \$31,000; perform audit of internal compliance program within 12 months	maximum fine was \$88,000 avg: \$3,875 fine was 35% of maximum full VSD

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07/05/05	In the Matter of BJ Services Company USA, L.P.	Exported chemicals to various destinations without the required licenses and with knowledge that a violation would occur; made false statements on SEDs and Automated Export System	764.2(a) [13] 764.2(e) [12] 764.2(g) [12]	Settlement Agreement - civil penalty of \$142,450; perform audit of internal compliance program within 24 months	maximum fine was \$407,000 avg: \$3,850 fine was 35% of maximum full VSD
07/13/05	In the Matter of Gould Pumps, Inc.	Exported magnetic drive and double mechanical seal industrial pumps and parts to Egypt, Saudi Arabia, India, Taiwan and the People's Republic of China without the required licenses; made false statements on SEDs	764.2(a) [13] 764.2(g) [13]	Settlement Agreement - civil penalty of \$123,500	maximum fine was \$286,000 avg: \$4,750 fine was 43% of maximum full VSD
09/07/05	Price Brothers (UK) Limited	Caused reexports to Libya by supplying spare parts to an exporter in the United Kingdom that subsequently reexported the items to Libya without the required authorization; reexported spare parts to Libya without the required authorization	764.2(b) [6] 764.2(a) [23]	Settlement Agreement - civil penalty of \$101,500	maximum fine was \$319,000 avg: \$3,500 fine was 32% of maximum full VSD
09/27/05	Sermatech International, Inc.	Exported technical data regarding coating, brazing and repair welding on components of gas turbine engines to its South Korean joint venture Sermatech Korea Ltd. without the required licenses	764.2(a) [5]	Settlement agreement - civil penalty of \$17,500	maximum fine was \$55,000 avg: \$3500 fine was 32% of maximum full VSD

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09/28/05	Norman, Fox & Co.	Exported a chemical mixture containing triethanolamine to Hong Kong without the required licenses	764.2(a) [12]	Settlement agreement - civil penalty of \$42,000; perform an audit of its internal compliance program not less than 12 months from the date of entry of the order	maximum fine was \$132,000 avg: \$3500 fine was 32% of maximum full VSD
09/27/05	Parker Hannifin Corporation	Exported check valves to the Republic of Taiwan without the required licenses and with knowledge that a violation would occur; export manual stop cock valves to the People's Republic of China without the required licenses; made false statements to the U.S. Government in connection	764.2(a) [18] 764.2(e) [17] 764.2(g) [18]	Settlement Agreement - civil penalty of \$185,000	maximum fine was \$583,000 avg: \$3490.57 fine was 32% of maximum full VSD