

VOLUNTARY SELF DISCLOSURE CASES
FY2009
(17 VSD CASES)

ORDER DATE	CASE NAME	CHARGES	SECTIONS VIOLATED	RESULT	PENALTY BREAKDOWN
12/12/08	In the Matter of Buehler Limited	Exported chemical mixture containing chemical precursor to Taiwan, Israel, Thailand and several other countries and reexported chemical mixture containing precursor from Germany to Iran without the required licenses (1C350c.9)	764.2(a) [81]	Settlement Agreement - civil penalty of \$200,000	maximum penalty of \$6.627million* avg. \$2,469.14 penalty was 3% of the max. *[57 violations @ \$11,000 and 24 violations @ 250,000]
12/15/08	In the Matter of Engineering Physics Software, Inc., d/b/a COADE, Inc.	Exported engineering software programs to Iran via United Arab Emirates without the required authorization for OFAC; exported engineering software programs to end-users in India and Pakistan that were listed on BIS's Entity List (Entity List; EAR99)	764.2(a) [22]	Settlement Agreement - civil penalty of \$130,000	maximum penalty \$398,000* avg. \$5,909.09 penalty was 33% of the max. *[18 violations @ \$11,000 and 4 violations @ 50,000]
12/18/08	In the Matter of Interpoint Corporation	Exported DC-to-DC converters and/or electromagnetic interference filters to the 13 th Institute in the Peoples' Republic of China, an end-user on BIS's Entity List and to the PRC without the required licenses and with knowledge that a violation would occur (Entity List; EAR99)	764.2(a) [37] 764.2(e) [2]	Settlement Agreement - civil penalty of \$200,000	maximum penalty \$429,000 avg. \$5,128.21 penalty was 47% of the max.

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4/22/09	In the Matter of BJ Services, Inc.	Exported valves and spare parts kit to various destinations without the required licenses and with knowledge that violations would occur (ECCN 2B350)	764.2(a) [33] 764.2(e) [34]	Settlement Agreement - civil penalty of \$800,000	maximum penalty \$1,907,000* avg. \$5,128.21 penalty was 42% of the max. *[37 violations @ \$11,000 and 30 violations @ \$50,000]
05/26/09	In the Matter of Philips Electronics	Exported a ultrasound medical device and a Jet Stream Workspace Cardiology Workstation medical device from the United States through the Netherlands to Cuba without the required license (EAR99)	764.2(a) [1] 764.2(a) [1]	Settlement Agreement - civil of \$9,000	maximum penalty \$22,000 avg. \$4,500.00 penalty was 41% of the max.
07/06/09	In the Matter of Firth Rixson, Inc. (d/b/a Firth Rixson Monroe)	Exported 1,055 pounds of Titanium 6-2-4-2 to the PRC without the required licenses (1C202)	764.2(a) [3]	Settlement Agreement - civil of \$85,000	maximum penalty \$750,000 avg. \$28,333.33 penalty was 11% of the max. [\$250,000]
07/13/09	In the Matter of Bruker AXS, Inc.	Exported an analytical X-ray instrument from the United States through France to Karachi CBW Research Institute, University of Karachi's Husein Ebrahim Jamal Research Institute of Chemistry ("HEJRIC"), in Karachi, Pakistan, an organization on BIS's Entity List without the required license; made false statement on SED concerning authority to export (EAR99)	764.2(a) [1] 764.2(g) [1]	Settlement Agreement - civil penalty of \$7,500	maximum penalty \$22,000 avg. \$3,750.00 penalty was 34% of the max.

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08/13/09	In the Matter of FMC Technologies, Inc.	Exported and reexported butterfly valves or check valves to various countries without the required licenses (ECCN 2B350)	764.2(a) [78]	Settlement Agreement - civil penalty of \$610,000	maximum penalty \$2,106,000* avg. \$7,820.51 penalty was 30% of the max. *[32 violations @ \$50,000 and 46 violations @ \$11,000]
09/11/09	In the Matter of Foxsemicon Integrated Technologies, Inc.	Exported pressure transducers to the PRC without the required licenses and with knowledge that violations would occur; made false statement on SEDs (ECCN 2B230)	764.2(a) [8] 764.2(e) [15] 764.2(g) [8]	Settlement Agreement - civil penalty of \$250,000; \$160,000 suspended	maximum penalty \$614,000* avg. \$8,065.00 penalty was 41% of the max. *[7 violations @ \$50,000 and 24 violations @ \$11,000]
09/11/09	In the Matter of Foxsemicon LLC	Aided and abetted the procuring and exporting of pressure transducers to the PRC; aided and abetted in indirectly making false statements to the U.S. Government in connection with the submission of export control documents (ECCN 2B230)	764.2(b) [23]	Settlement Agreement - civil penalty of \$160,000	maximum penalty \$526,000* avg. \$6,956.52 penalty was 30% of the max. *[7 violations @ \$50,000 and 16 violations @ \$11,000]
09/11/09	In the Matter of Thermon Far East Ltd.	Caused, aided, abetted and/or induced the reexport of U.S.-origin heat tracing equipment from the Netherlands to Libya without the required licenses (EAR99)	764.2(b) [3]	Settlement Agreement - civil penalty of \$13,500	maximum penalty \$33,000 avg. \$4,500.00 penalty was 41% of the max.

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09/11/09	In the Matter of Thermon Heat Tracers Pvt. Ltd.	Caused, aided, abetted and/or induced the export of U.S.-origin heat tracing equipment from the United States to end users in India that were listed on BIS's Entity List without the required licenses (EAR99)	764.2(b) [7]	Settlement Agreement - civil penalty of \$31,500	maximum penalty \$77,000 avg. \$4,500.00 penalty was 41% of the max.
09/11/09	In the Matter of Thermon Korea, Ltd.	Caused, aided, abetted and/or induced the export of heat tracing equipment from the United States to Iran via South Korea without the required licenses and with knowledge that violations would occur (EAR99)	764.2(b) [5] 764.2(e) [3]	Settlement Agreement - civil penalty of \$58,500	maximum penalty \$127,000* avg. \$7,312.50 penalty was 46% of the max. *[1 violation @ \$50,000 and 7 violations @ \$11,000]
09/11/09	In the Matter of Thermon (U.K.) Ltd.	Caused, aided, abetted and/or induced the export and reexport of heat tracing equipment from the United States to Iran via the United Kingdom and from the Netherlands to Libya without the required licenses and with knowledge that violations would occur (EAR99)	764.2(b) [4] 764.2(e) [2]	Settlement Agreement - civil penalty of \$29,000	maximum penalty \$66,000 avg. \$4,833.33 penalty was 44% of the max.
09/11/09	In the Matter of Thermon Europe B.V.	Reexported U.S.-origin heat tracing equipment from the Netherlands to Libya without the required licenses and with knowledge that violations would occur (EAR99)	764.2(a) [6] 764.2(e) [3]	Settlement Agreement - civil penalty of \$43,500	maximum penalty \$99,000 avg. \$4,833.33 penalty was 44% of the max.
09/25/09	In the Matter of Electronic Cable Specialists, Inc.	Exported accelerometers to Malaysia and Indonesia without the required licenses; failed to file the required SEDs (ECCN 7A101)	764.2(a) [6]	Settlement Agreement - civil penalty of \$27,500	maximum penalty \$66,000 avg. \$4,583.33 penalty was 42% of the max.

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09/25/09	GE Homeland Protection, Inc.	Exported spare parts for explosive detection systems to South Korea without the required license and with knowledge that a violation would occur; reexported spare parts for explosive detection systems from France to South Africa without the required license and with knowledge that a violation would occur (ECCN 2A983)	764.2(a) [2] 764.2(e) [2]	Settlement Agreement - civil penalty of \$22,000	maximum penalty \$44,000 avg. \$5,500.00 penalty was 50% of the max.