

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

\_\_\_\_\_  
In the Matter of: )  
 )  
Amy Farrow )  
1493 Sanbrook Ct. )  
Bethlehem, PA 18015 )  
 )  
Respondent )  
\_\_\_\_\_

ORDER RELATING TO AMY FARROW

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Amy Farrow, in her individual capacity and as sole proprietor of The Wholesale Discount Store of Bethlehem, Pennsylvania (“Farrow”), of its intention to initiate an administrative proceeding against Farrow pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”)<sup>1</sup> and Section 13(c) of the Export Administration Act of 1979, as amended (the “Act”),<sup>2</sup> through the issuance of a Proposed Charging Letter to Farrow that alleged that she committed 116 violations of the Regulations. Specifically, the charges are:

**Charges 1-116      15 C.F.R. § 764.2(a): Exporting Stun Guns without a License**

On 116 occasions between on or about January 1, 2008 and on or about July 20, 2008, Farrow engaged in conduct prohibited by the Regulations by exporting items subject to the Regulations to various destinations without the required Department of Commerce authorization. Specifically, Farrow exported 254 stun guns, items subject to the Regulations, classified under Export Control Classification Number 0A985, and controlled for export to these destinations for

<sup>1</sup> The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2010). The charged violations occurred in 2008. The Regulations governing the violations at issue are found in the 2008 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2008)). The 2010 Regulations set forth the procedures that apply to this matter.

<sup>2</sup> 50 U.S.C. app. §§ 2401-2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13,222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), as extended most recently by the Notice of August 17, 2010 (75 Fed. Reg. 50,681 (Aug. 16, 2010)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701 *et seq.*).

crime control reasons, without the export licenses required by Section 742.7 of the Regulations. In exporting these items without a license, Farrow committed 116 violations of Section 764.2(a) of the Regulations.

WHEREAS, BIS and Farrow 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, for a period of two years from the date of this Order, Amy Farrow, 1493 Sanbrook Ct., Bethlehem, PA 18015, her representatives, assigns or agents (hereinafter collectively referred to as "Denied Person") may not participate, directly or indirectly, 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:

- 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;
- 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.

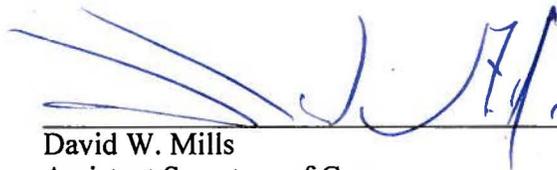
THIRD, that, after notice and opportunity for comment as provided in Section 766.23 of the Regulations, any person, firm, corporation, or business organization related to Farrow by affiliation, ownership, control, or position of responsibility in the conduct of trade or related services may also be made 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.

FIFTH, that, as authorized by Section 766.18(c) of the Regulations, the second year of the two year denial period set forth above shall be suspended and shall thereafter be waived, provided that during the first year of the denial period and during the period of suspension, Farrow has committed no violation of the Act or any regulation, order or license issued thereunder.

SIXTH, that the Proposed Charging Letter, the Settlement Agreement, and this Order shall be made available to the public.

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



David W. Mills  
Assistant Secretary of Commerce  
for Export Enforcement

Issued this 28 day of February, 2011.

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

\_\_\_\_\_  
In the Matter of: )  
 )  
Amy Farrow )  
1493 Sanbrook Ct. )  
Bethlehem, PA 18015 )  
 )  
\_\_\_\_\_  
Respondent )

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Amy Farrow, in her individual capacity and as sole proprietor of The Wholesale Discount Store of Bethlehem, Pennsylvania (“Farrow”), and the Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) (collectively, the “Parties”), pursuant to Section 766.18(a) of the Export Administration Regulations (the “Regulations”),<sup>1</sup> issued pursuant to the Export Administration Act of 1979, as amended (the “Act”).<sup>2</sup>

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

WHEREAS, BIS has issued a proposed charging letter to Farrow that alleged that Farrow committed 116 violations of the Regulations, specifically:

<sup>1</sup> The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2010). The charged violations occurred in 2008. The Regulations governing the violations at issue are found in the 2008 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2008)). The 2010 Regulations set forth the procedures that apply to this matter.

<sup>2</sup> 50 U.S.C. app. §§ 2401-2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13,222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), as extended most recently by the Notice of August 17, 2010 (75 Fed. Reg. 50,681 (Aug. 16, 2010)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701 *et seq.*).

**Charges 1-116      15 C.F.R. § 764.2(a): Exporting Stun Guns without a License**

On 116 occasions between on or about January 1, 2008 and on or about July 20, 2008, Farrow engaged in conduct prohibited by the Regulations by exporting items subject to the Regulations to various destinations without the required Department of Commerce authorization. Specifically, Farrow exported 254 stun guns, items subject to the Regulations, classified under Export Control Classification Number 0A985, and controlled for export to these destinations for crime control reasons, without the export licenses required by Section 742.7 of the Regulations. In exporting these items without a license, Farrow committed 116 violations of Section 764.2(a) of the Regulations.

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

WHEREAS, Farrow 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, Farrow enters into this Agreement voluntarily and with full knowledge of her rights;

WHEREAS, Farrow states that no promises or representations have been made to her other than the agreements and considerations herein expressed;

WHEREAS, Farrow neither admits nor denies the allegations contained in the Proposed Charging Letter;

WHEREAS, Farrow wishes to settle and dispose of all matters alleged in the Proposed Charging Letter by entering into this Agreement; and

WHEREAS, Farrow agrees to be bound by the Order, if issued;

NOW THEREFORE, the Parties hereby agree, for purposes of this Settlement Agreement, as follows:

1. BIS has jurisdiction over Farrow, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.

2. The following sanction shall be imposed against Farrow in complete settlement of the alleged violations of the Regulations relating to the transactions specifically detailed in the Proposed Charging Letter:

- a. For a period of two years from the date of issuance of the Order, Farrow, and when acting on behalf of Farrow, her representatives, assigns, or agents (“Denied Person”) may not participate, directly or indirectly, 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:
  - 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.

b. BIS agrees that, as authorized by Section 766.18(c) of the Regulations, the second year of the two year denial period set forth in paragraph 2.a shall be suspended and shall thereafter be waived, provided that during the first year of the denial period and during the period of suspension, Farrow has committed no violation of the Act or any regulation, order, or license issued thereunder.

3. Subject to the approval of this Agreement pursuant to paragraph 8 hereof, Farrow 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 issued), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; and (b) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued.

4. BIS agrees that, upon issuance of the Order, it will not initiate any further administrative proceeding against Farrow in connection with any violation of the Act or the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter.

5. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, 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 issued; nor shall this agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the U.S. 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 issuing the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

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

AMY FARROW



Douglas R. Hassebrock  
Director  
Office of Export Enforcement

Amy Farrow

Date: 2/24/11

Date: 2/14/11

PROPOSED CHARGING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Amy Farrow  
1493 Sanbrook Ct.  
Bethlehem, PA 18015

Dear Ms. Farrow:

The Bureau of Industry and Security, United States Department of Commerce (“BIS”), has reason to believe that you, Amy Farrow, in your individual capacity and as sole proprietor of The Wholesale Discount Store of Bethlehem, Pennsylvania (“Farrow”), have committed 116 violations of the Export Administration Regulations (the “Regulations”),<sup>1</sup> which are issued under the authority of the Export Administration Act of 1979, as amended (the “Act”).<sup>2</sup> Specifically, BIS charges that Farrow committed the following violations:

**Charges 1-116      15 C.F.R. § 764.2(a): Exporting Stun Guns without a License**

As described in greater detail in the attached Schedule of Violations, which is incorporated herein by reference, on 116 occasions between on or about January 1, 2008 and on or about July 20, 2008, Farrow engaged in conduct prohibited by the Regulations by exporting items subject to the Regulations to various destinations without the required Department of Commerce authorization. Specifically, Farrow exported 254 stun guns, items subject to the Regulations, classified under Export Control Classification Number 0A985, and controlled for export to these destinations for crime control reasons, without the export licenses required by Section 742.7 of the Regulations. In exporting these items without a license, Farrow committed 116 violations of Section 764.2(a) of the Regulations.

\* \* \* \* \*

Accordingly, Farrow is hereby notified that an administrative proceeding is instituted against her pursuant to Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including any or all of the following:

---

<sup>1</sup> The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2010). The charged violations occurred during 2008. The Regulations governing the violations at issue are found in the 2008 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2008)). The 2010 Regulations establish the procedures that apply to this matter.

<sup>2</sup> 50 U.S.C. app. §§ 2401-2420 (2000). 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)), which has been extended by successive Presidential Notices, the most recent being that of August 12, 2010 (75 Fed. Reg. 50681 (Aug. 16, 2010)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707 (2000)).

- The maximum civil penalty allowed by law of up to the greater of \$250,000 per violation, or twice the value of the transaction that is the basis of the violation<sup>3</sup>;
- Denial of export privileges; and/or
- Exclusion from practice before BIS.

If Farrow 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. *See* 15 C.F.R. §§ 766.6 and 766.7 (2010). If Farrow defaults, the Administrative Law Judge may find the charges alleged in this letter to be true without a hearing or further notice to her. The Under Secretary for Industry and Security may then impose up to the maximum penalty on the charges in this letter.

Farrow is further notified that she is entitled to an agency hearing on the record if she files a written demand for one with her answer. *See* 15 C.F.R. § 766.6 (2010). Farrow is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent her. *See* 15 C.F.R. §§ 766.3(a) and 766.4 (2010).

Farrow is further notified that under the Small Business Regulatory Enforcement Flexibility Act, she may be eligible for assistance from the Office of the National Ombudsman of the Small Business Administration in this matter. To determine eligibility and get more information, please see: <http://www.sba.gov/ombudsman/>.

The Regulations provide for settlement without a hearing. *See* 15 C.F.R. § 766.18 (2010). Should Farrow have a proposal to settle this case, Farrow or her representative should transmit it to 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, Farrow's answer must be filed in accordance with the instructions set forth 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 Farrow's answer must be served on BIS at the following address:

Chief Counsel for Industry and Security  
Attention: Charles Wall, Esq.  
Room H-3839  
United States Department of Commerce  
14th Street and Constitution Avenue, N.W.

---

<sup>3</sup> *See* International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

Amy Farrow  
Proposed Charging Letter  
Page 3 of 3

Washington, D.C. 20230

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

Sincerely,

Douglas R. Hassebrock  
Director  
Office of Export Enforcement

Amy Farrow  
Proposed Charging Letter  
Schedule of Violations

Charge No.	Appx. Date	Order #	Destination	USPS Tracking #	Item(s)	Value	ECCN	Violation
1	1/1/08	3522308	Latvia	LC374206481US	Stun Gun	\$ 32.75	0A985	§ 764.2(a)
2	1/2/08	3527430	Brazil	LC374206549US	Stun Gun	\$ 24.45	0A985	§ 764.2(a)
3	1/2/08	3528000	Finland	LC374206566US	Stun Gun	\$ 24.90	0A985	§ 764.2(a)
4	1/8/08	3560203	Russia	LC967115968US	Stun Gun	\$ 32.75	0A985	§ 764.2(a)
5	1/9/08	3566854	Germany	LC967115455US	Stun Gun	\$ 32.75	0A985	§ 764.2(a)
6	1/9/08	3567936	Germany	LC967115486US	Stun Guns	\$ 27.78	0A985	§ 764.2(a)
7	1/10/08	3575602	Venezuela	LC411690761US	Stun Guns	\$ 39.95	0A985	§ 764.2(a)
8	1/11/08	3577370	Isle of Man	LC909656249US	Stun Gun	\$ 29.85	0A985	§ 764.2(a)
9	1/14/08	3596155	Ireland	LC909656354US	Stun Gun	\$ 24.90	0A985	§ 764.2(a)
10	1/16/08	3606519	France	LC909656408US	Stun Gun	\$ 32.75	0A985	§ 764.2(a)
11	1/18/08	3618896	Saudi Arabia	LC909665696US	Stun Gun	\$ 35.24	0A985	§ 764.2(a)
12	1/30/08	3686812	Netherlands	LC277583731US	Stun Guns	\$ 65.50	0A985	§ 764.2(a)
13	1/30/08	3687171	Ireland	CP362768683US	Stun Guns	\$215.50	0A985	§ 764.2(a)
14	2/2/08	3706385	Spain	CP637682754US	Stun Guns	\$218.70	0A985	§ 764.2(a)
15	2/3/08	3710557	Greece	LC661906293US	Stun Gun	\$ 54.95	0A985	§ 764.2(a)
16	2/13/08	3774580	France	CP637682723US	Stun Gun	\$ 98.25	0A985	§ 764.2(a)
17	2/13/08	3774796	Guatemala	LC373561680US	Stun Gun	\$131.00	0A985	§ 764.2(a)
18	2/18/08	3806467	Mexico	LC373561945US	Stun Gun	\$ 32.75	0A985	§ 764.2(a)
19	2/20/08	3823332	France	LC373562036US	Stun Gun	\$ 32.75	0A985	§ 764.2(a)
20	2/21/08	3828299	Spain	CP637682683US	Stun Gun	\$219.80	0A985	§ 764.2(a)
21	2/22/08	3837933	France	LC373562084US	Stun Gun	\$ 47.95	0A985	§ 764.2(a)
22	2/23/08	3844479	Portugal	LC373562138US	Stun Gun	\$ 32.75	0A985	§ 764.2(a)
23	2/28/08	3879540	Spain	LC411690554US	Stun Gun	\$ 16.45	0A985	§ 764.2(a)
24	3/1/08	3894108	Greece	LC411690656US	Stun Gun	\$ 54.95	0A985	§ 764.2(a)
25	3/1/08	3895952	Spain	LC411690625US	Stun Gun	\$ 27.78	0A985	§ 764.2(a)
26	3/6/08	3931583	Greece	LC411690903US	Stun Gun	\$ 38.80	0A985	§ 764.2(a)
27	3/10/08	3957404	France	LC411691020US	Stun Gun	\$ 24.45	0A985	§ 764.2(a)
28	3/11/08	3969396	Croatia	LC412383630US	Stun Gun	\$ 29.90	0A985	§ 764.2(a)
29	3/12/08	3974906	Greece	LC412383665US	Stun Gun	\$ 38.80	0A985	§ 764.2(a)
30	3/14/08	3986892	Russia	LC412383745US	Stun Gun	\$ 32.75	0A985	§ 764.2(a)
31	3/19/08	4026435	France	CP637682652US	Stun Guns	\$192.70	0A985	§ 764.2(a)
32	3/21/08	4039203	France	LC412383997US	Stun Guns	\$ 62.64	0A985	§ 764.2(a)
33	3/21/08	4040036	France	LC411910649US	Stun Guns	\$116.40	0A985	§ 764.2(a)
34	3/21/08	4042076	Greece	LC411910670US	Stun Guns	\$ 57.20	0A985	§ 764.2(a)
35	3/28/08	4090236	Germany	LC411910811US	Stun Gun	\$ 38.80	0A985	§ 764.2(a)
36	3/28/08	4090372	Spain	LC411910825US	Stun Gun	\$ 53.85	0A985	§ 764.2(a)
37	3/29/08	4099810	France	CP637682618US	Stun Guns	\$265.00	0A985	§ 764.2(a)
38	4/3/08	4135232	Lithuania	LC4114911009US	Stun Gun	\$ 32.75	0A985	§ 764.2(a)
39	4/6/08	4157472	Morocco	LC227510246US	Stun Gun	\$ 54.95	0A985	§ 764.2(a)
40	4/8/08	4171658	Greece	LC227510285US	Stun Gun	\$ 37.95	0A985	§ 764.2(a)
41	4/8/08	4172478	France	LC4172478US	Stun Gun	\$ 36.95	0A985	§ 764.2(a)
42	4/9/08	4179589	France	LC227510405US	Stun Gun	\$ 29.89	0A985	§ 764.2(a)
43	4/9/08	4179863	Spain	LC227510436US	Stun Guns	\$ 86.95	0A985	§ 764.2(a)
44	4/10/08	4191728	France	CP637682547US	Stun Gun	\$489.00	0A985	§ 764.2(a)
45	4/11/08	4195840	France	LC227510467US	Stun Gun	\$ 29.90	0A985	§ 764.2(a)
46	4/14/08	4217790	Spain	LC227510714US	Stun Gun	\$ 16.45	0A985	§ 764.2(a)
47	4/17/08	4239877	Brazil		Stun Gun	\$ 37.95	0A985	§ 764.2(a)
48	4/18/08	4246648	France	LC313465553US	Stun Gun	\$ 22.90	0A985	§ 764.2(a)
49	4/21/08	4268121	Israel	LC277583657US	Stun Gun	\$ 33.90	0A985	§ 764.2(a)
50	4/22/08	4274080	Latvia	LC346737696US	Stun Gun	\$ 75.90	0A985	§ 764.2(a)

Amy Farrow  
Proposed Charging Letter  
Schedule of Violations

Charge No.	Appx. Date	Order #	Destination	USPS Tracking #	Item(s)	Value	ECCN	Violation
51	4/22/08	4276228	France	LC277583691US	Stun Gun	\$ 28.40	0A985	§ 764.2(a)
52	4/23/08	4287560	Brazil	LC277583714US	Stun Gun	\$ 37.95	0A985	§ 764.2(a)
53	4/24/08	4292232	Netherlands	LC346544381US	Stun Guns	\$ 85.90	0A985	§ 764.2(a)
54	4/28/08	4316849	Peru	LC4317485US	Stun Gun	\$ 25.45	0A985	§ 764.2(a)
55	4/28/08	4319447	Ukraine	LC346544126US	Stun Gun	\$ 20.91	0A985	§ 764.2(a)
56	4/30/08	4332786	Spain	CP590007579US	Stun Gun	\$192.05	0A985	§ 764.2(a)
57	5/5/08	4373176	Brazil	LC346737563US	Stun Gun	\$ 38.41	0A985	§ 764.2(a)
58	5/7/08	4384177	Latvia	LC346737705US	Stun Gun	\$ 31.41	0A985	§ 764.2(a)
59	5/7/08	4384377	Peru	LC346737736US	Stun Gun	\$ 24.40	0A985	§ 764.2(a)
60	5/8/08	4390531	France	LC346737719US	Stun Gun	\$ 38.41	0A985	§ 764.2(a)
61	5/9/08	4399412	Lithuania	LC346737855US	Stun Gun	\$ 38.41	0A985	§ 764.2(a)
62	5/9/08	4401032	Spain	CP590009534US	Stun Gun	\$384.10	0A985	§ 764.2(a)
63	5/13/08	4428969	Philippines	LC346617764US	Stun Gun	\$ 14.36	0A985	§ 764.2(a)
64	5/14/08	4439485	Sri Lanka	LC277583802US	Stun Gun	\$ 33.41	0A985	§ 764.2(a)
65	5/16/08	4449706	Ukraine	LC891279173US	Stun Gun	\$ 34.16	0A985	§ 764.2(a)
66	5/16/08	4452013	Latvia	LC277583881US	Stun Gun	\$ 31.41	0A985	§ 764.2(a)
67	5/17/08	4456488	Latvia	LC277583935US	Stun Gun	\$ 76.82	0A985	§ 764.2(a)
68	5/18/08	4464696	Brazil	LC4464696US	Stun Gun	\$ 27.70	0A985	§ 764.2(a)
69	5/19/08	4469562	Ireland	CP637682445US	Stun Gun	\$334.10	0A985	§ 764.2(a)
70	5/19/08	4470910	Indonesia	LC590009494US	Stun Gun	\$ 33.41	0A985	§ 764.2(a)
71	5/20/08	4480699	France	LC346617645US	Stun Gun	\$ 29.50	0A985	§ 764.2(a)
72	5/21/08	4486429	Greece	LC346617693US	Stun Gun	\$ 34.16	0A985	§ 764.2(a)
73	5/21/08	4487298	France	LC346617778US	Stun Guns	\$100.90	0A985	§ 764.2(a)
74	5/21/08	4487379	Spain	LC346617755US	Stun Gun	\$ 58.41	0A985	§ 764.2(a)
75	5/23/08	4499523	Spain	LC451071038US	Stun Guns	\$272.05	0A985	§ 764.2(a)
76	5/23/08	4501291	Spain	LC346617897US	Stun Gun	\$ 17.99	0A985	§ 764.2(a)
77	5/27/08	4528171	Spain	LC891279301US	Stun Gun	\$ 24.40	0A985	§ 764.2(a)
78	5/28/08	4532206	Spain	LC891279315US	Stun Gun	\$ 24.41	0A985	§ 764.2(a)
79	5/28/08	4532731	Germany	LC891279329US	Stun Guns	\$200.18	0A985	§ 764.2(a)
80	5/28/08	4535960	Spain	LC891279417US	Stun Gun	\$ 28.72	0A985	§ 764.2(a)
81	5/28/08	4536553	Spain	LC891279417US	Stun Gun	\$ 50.41	0A985	§ 764.2(a)
82	6/2/08	4572616	Spain	LC891279615US	Stun Gun	\$ 58.41	0A985	§ 764.2(a)
83	6/3/08	4580725	Greece	LC891279712US	Stun Gun	\$ 39.82	0A985	§ 764.2(a)
84	6/4/08	4584691	Finland	LC451103288US	Stun Guns	\$ 63.31	0A985	§ 764.2(a)
85	6/6/08	4598597	France	LC891279831US	Stun Gun	\$ 35.98	0A985	§ 764.2(a)
86	6/6/08	4598978	Romania	LC451103040US	Stun Gun	\$287.95	0A985	§ 764.2(a)
87	6/6/08	4599200	Spain	LC891279814US	Stun Gun	\$ 29.50	0A985	§ 764.2(a)
88	6/6/08	4603925	Latvia	LC451071086US	Stun Gun	\$ 49.80	0A985	§ 764.2(a)
89	6/8/08	4609130	France	CP637682357US	Stun Guns	\$149.70	0A985	§ 764.2(a)
90	6/8/08	4609151	France	CP637682357US	Stun Gun	\$ 50.41	0A985	§ 764.2(a)
91	6/8/08	4611607	Greece	LC451071041US	Stun Gun	\$ 59.73	0A985	§ 764.2(a)
92	6/9/08	4616304	Finland	LC451103288US	Stun Gun	\$ 24.90	0A985	§ 764.2(a)
93	6/13/08	4640565	France	LC451071316US	Stun Gun	\$ 53.97	0A985	§ 764.2(a)
94	6/15/08	4654233	France	LC451071483US	Stun Gun	\$ 27.41	0A985	§ 764.2(a)
95	6/17/08	4664124	Spain	LC451103084US	Stun Gun	\$ 19.91	0A985	§ 764.2(a)
96	6/17/08	4664619	Finland	LC451103107US	Stun Gun	\$ 31.41	0A985	§ 764.2(a)
97	6/17/08	4665249	Spain	LC451103115US	Stun Gun	\$ 48.80	0A985	§ 764.2(a)
98	6/18/08	4670588	Germany	LC451103190US	Stun Guns	\$ 38.77	0A985	§ 764.2(a)
99	6/18/08	4670740	Germany	LC451103169US	Stun Gun	\$ 27.41	0A985	§ 764.2(a)
100	6/18/08	4672290	Brazil	LC451103212US	Stun Gun	\$ 27.41	0A985	§ 764.2(a)

Amy Farrow  
Proposed Charging Letter  
Schedule of Violations

Charge No.	Appx. Date	Order #	Destination	USPS Tracking #	Item(s)	Value	ECCN	Violation
101	6/19/08	4676918	Spain	LC450034285US	Stun Gun	\$ 27.41	0A985	§ 764.2(a)
102	6/22/08	4693867	Spain	LC451103455US	Stun Gun	\$ 29.66	0A985	§ 764.2(a)
103	6/23/08	4701100	Ireland	LC450034073US	Stun Gun	\$ 54.82	0A985	§ 764.2(a)
104	6/24/08	4707970	Brazil	LC450034113US	Stun Gun	\$ 27.41	0A985	§ 764.2(a)
105	6/28/08	4733482	France	LC450034365US	Stun Gun	\$ 50.41	0A985	§ 764.2(a)
106	7/1/08	4751920	Ukraine	LC450034515US	Stun Gun	\$ 19.91	0A985	§ 764.2(a)
107	7/5/08	4774345	Latvia	LC133667554US	Stun Gun	\$ 49.80	0A985	§ 764.2(a)
108	7/5/08	4775309	France	LC450266262US	Stun Gun	\$ 30.41	0A985	§ 764.2(a)
109	7/8/08	4791725	Spain	LC133667639US	Stun Gun	\$ 34.41	0A985	§ 764.2(a)
110	7/9/08	4798842	Greece	LC133667700US	Stun Gun	\$ 73.20	0A985	§ 764.2(a)
111	7/11/08	4811731	Germany	LC133667801US	Stun Gun	\$ 30.41	0A985	§ 764.2(a)
112	7/11/08	4812493	Ireland	LC133667846US	Stun Guns	\$ 67.82	0A985	§ 764.2(a)
113	7/12/08	4818269	Brazil	LC133667917US	Stun Gun	\$ 17.99	0A985	§ 764.2(a)
114	7/14/08	4827362	Spain	LC133667982US	Stun Gun	\$ 27.70	0A985	§ 764.2(a)
115	7/20/08	4864583	UAE	LC134188489US	Stun Gun	\$ 34.16	0A985	§ 764.2(a)
116	7/20/08	4867784	Saudi Arabia	CP626103091US	Stun Gun	\$ 34.41	0A985	§ 764.2(a)