

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

In the Matter of:

Akrion Systems, LLC
6330 Hedgewood Drive, #150
Allentown, PA 18106

Respondent

ORDER RELATING TO
AKRION SYSTEMS, LLC

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Akrion Systems, LLC, of Allentown, Pennsylvania (“Akrion”), of its intention to initiate an administrative proceeding against Akrion pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),¹ and Section 13(c) of the Export Administration Act of 1979, as amended (the “Act”),² through the issuance of a Proposed Charging Letter to Akrion that alleges that Akrion committed 144 violations of the Regulations. Specifically, the charges are:

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2012). The charged violations occurred in 2002-2007. The Regulations governing the violations at issue are found in the 2002-2007 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774). The 2012 Regulations set forth the procedures that apply to this matter.

² 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, 2011 (76 Fed. Reg. 50,661 (Aug. 16, 2011)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*).

**Charges 1-144 15 C.F.R. § 764.2(a) - Engaging in Prohibited Conduct by
Exporting Valves, Pumps and Components Without the
Required Licenses**

On 144 occasions, between on or about June 18, 2002 and on or about August 27, 2007, Akrion engaged in conduct prohibited by the Regulations by exporting valves, pumps and components, items classified under Export Control Classification Number ("ECCN") 2B350, controlled for reasons of chemical and biological weapons proliferation and valued at approximately \$853,230, from the United States to Taiwan, Singapore, Malaysia and the People's Republic of China ("China"), without the Department of Commerce licenses required by Section 742.2(a) of the Regulations. In so doing, Akrion committed 144 violations of Section 764.2(a) of the Regulations.

WHEREAS, BIS and Akrion 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, Akrion shall be assessed a civil penalty in the amount of \$900,000. The payment of \$100,000 shall be made to the U.S. Department of Commerce in eight installments of: \$12,500 not later than September 3, 2012; \$12,500 not later than December 3, 2012; \$12,500 not later than March 1, 2013; \$12,500 not later than June 3, 2013; \$12,500 not later than September 2, 2013; \$12,500 not later than December 2, 2013; \$12,500 not later than March 3, 2014; and \$12,500 not later than June 2, 2014. If any of the eight installment payments is not fully and timely made, any remaining scheduled installment payments and any suspended penalty shall become due and owing immediately. Akrion may prepay any of the installment payments listed above. Payment of the remaining \$800,000 shall be suspended for a period of two years from the date of the Order, and thereafter shall be waived, provided that during this two-year payment

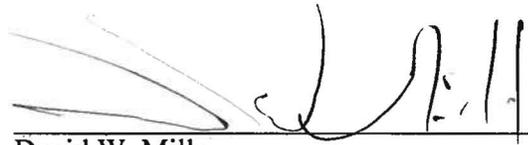
probationary period under the Order, Akrion has committed no violation of the Act, or any regulation, order, license or authorization issued thereunder and has made full and timely payment of \$100,000 as set forth above.

SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (2000)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and if payment is not made by the due dates specified herein, Akrion will be assessed, in addition to the full amount of the civil penalty and interest, a penalty charge and an administrative charge, as more fully described in the attached Notice.

THIRD, that the full and timely payment of the civil penalty in accordance with the payment schedule set forth above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Akrion. Accordingly, if Akrion should fail to pay the civil penalty in a full and timely manner, the undersigned may issue an Order denying all of Akrion's export privileges under the Regulations for a period of one year from the date of failure to make such payment.

FOURTH, 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 6th day of June, 2012.

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

In the Matter of:

Akrion Systems, LLC
6330 Hedgewood Drive, #150
Allentown, PA 18106

Respondent

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Akrion Systems, LLC, of Allentown, Pennsylvania (“Akrion”), 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”),¹ issued pursuant to the Export Administration Act of 1979, as amended (the “Act”).²

WHEREAS, Akrion filed a voluntary self-disclosure with BIS’s Office of Export Enforcement in accordance with Section 764.5 of the Regulations concerning the transactions at issue herein;

WHEREAS, BIS has notified Akrion of its intentions to initiate an administrative proceeding against Akrion, pursuant to the Act and the Regulations;

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2012). The charged violations occurred in 2002-2007. The Regulations governing the violations at issue are found in the 2002-2007 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774). The 2012 Regulations set forth the procedures that apply to this matter.

² 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, 2011 (76 Fed. Reg. 50,661 (Aug. 16, 2011)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*).

WHEREAS, BIS has issued a Proposed Charging Letter to Akrion that alleges that Akrion committed 144 violations of the Regulations, specifically:

Charges 1-144 15 C.F.R. § 764.2(a) - Engaging in Prohibited Conduct by Exporting Valves, Pumps and Components Without the Required Licenses

On 144 occasions, between on or about June 18, 2002 and on or about August 27, 2007, Akrion engaged in conduct prohibited by the Regulations by exporting valves, pumps and components, items classified under Export Control Classification Number ("ECCN") 2B350, controlled for reasons of chemical and biological weapons proliferation and valued at approximately \$853,230, from the United States to Taiwan, Singapore, Malaysia and the People's Republic of China ("China"), without the Department of Commerce licenses required by Section 742.2(a) of the Regulations. In so doing, Akrion committed 144 violations of Section 764.2(a) of the Regulations.

WHEREAS, Akrion has reviewed the Proposed Charging Letter and is aware of the allegations made against it and the administrative sanctions that could be imposed against it if the allegations are found to be true;

WHEREAS, Akrion 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, Akrion enters into this Agreement voluntarily and with full knowledge of its rights, after having consulted with counsel;

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

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

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

WHEREAS, Akrion 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 Akrion, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.
2. The following sanction shall be imposed against Akrion in complete settlement of the alleged violations of the Regulations relating to the transactions specifically detailed in the Proposed Charging Letter:

- a. Akrion shall be assessed a civil penalty in the amount of \$900,000.

Akrion shall pay the U.S. Department of Commerce \$100,000 in eight installments of: \$12,500 not later than September 3, 2012; \$12,500 not later than December 3, 2012; \$12,500 not later than March 1, 2013; \$12,500 not later than June 3, 2013; \$12,500 not later than September 2, 2013; \$12,500 not later than December 2, 2013; \$12,500 not later than March 3, 2014; and \$12,500 not later than June 2, 2014. Payment shall be made in the manner specified in the attached instructions. If any of the eight installment payments is not fully and timely made, any remaining scheduled installment payments and any suspended penalty shall become due and owing immediately. Akrion may prepay any of the installments payments listed above. Payment of the remaining \$800,000 shall be suspended for a period of two years from the date of the Order, and thereafter shall be waived, provided that during this two-year payment probationary period under the Order, Akrion has committed no violation of the Act, or any regulation, order, license or authorization issued thereunder and has made full and timely payment of \$100,000 as set forth above.

b. The full and timely payment of the civil penalty agreed to in Paragraph 2.a, is hereby made conditions to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Akrion. Failure to make full and timely payment of the civil penalty may result in the denial of all of Akrion's export privileges under the Regulations for one year from the date of the failure to make such payment.

3. Subject to the approval of this Agreement pursuant to Paragraph 7 hereof, Akrion 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; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if issued; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued. Akrion also waives and will not assert any Statute of Limitations defense, and the Statute of Limitations will be tolled, in connection with any violation of the Act or the Regulations arising out of the transactions identified in the Proposed Charging Letter or in connection with collection of the civil penalty or enforcement of this Agreement and the Order, if issued, from the date of the Order until Akrion pays in full the civil penalty agreed to in Paragraph 2.a of this Agreement.

4. BIS agrees that upon full and timely payment of the civil penalty as set forth in Paragraph 2.a above BIS will not initiate any further administrative proceeding against Akrion in connection with any violation of the Act or the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter and voluntary self-disclosure.

5. 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.

6. 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.

7. This Agreement shall become binding on the Parties 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.

8. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, available to the public.

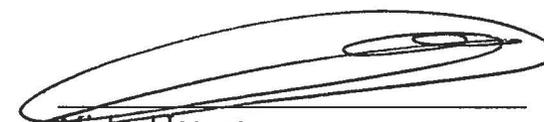
9. Each signatory affirms that he has authority to enter into this Settlement Agreement and to bind his respective party to the terms and conditions set forth herein.

BUREAU OF INDUSTRY AND
SECURITY
U.S. DEPARTMENT OF COMMERCE



Douglas R. Hassebrock
Director of Export Enforcement

AKRION SYSTEMS, LLC

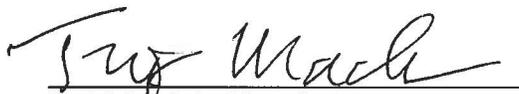


Michael Ioannou
President
Akrion Systems, LLC

Date: 6/4/12

Date: 5/30/12

Reviewed and approved by:



J. Triplett Mackintosh, Esq.
Holland & Hart LLP
Counsel for Akrion Systems, LLC

Date: 5/31/12

PROPOSED CHARGING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Akrion Systems, LLC
6330 Hedgewood Drive, #150
Allentown, PA, USA 18106

Attention: Mr. Michael Ioannou, President

Dear Mr. Ioannou:

The Bureau of Industry and Security, United States Department of Commerce (“BIS”), has reason to believe that Akrion Systems, LLC (“Akrion”), of Allentown, Pennsylvania is liable for 144 violations of the Export Administration Regulations (the “Regulations”),¹ which are issued under the authority of the Export Administration Act of 1979, as amended (the “Act”).² Specifically, BIS charges that Akrion is liable for the following violations:

Charges 1-144 15 C.F.R. § 764.2(a) - Engaging in Prohibited Conduct by Exporting Valves, Pumps and Components Without the Required Licenses

As described in greater detail in the attached Schedule of Violations, which is incorporated herein by reference, on 144 occasions, between on or about June 18, 2002 and on or about August 27, 2007, Akrion engaged in conduct prohibited by the Regulations by exporting valves, pumps and components, items classified under Export Control Classification Number (“ECCN”) 2B350, controlled for reasons of chemical and biological weapons proliferation and valued at approximately \$853,230, from the United States to Taiwan, Singapore, Malaysia and the People’s Republic of China (“China”), without the Department of Commerce licenses required by Section 742.2(a) of the Regulations. In so doing, Akrion committed 144 violations of Section 764.2(a) of the Regulations.

* * * * * * *

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2010). The charged violations occurred between 2002 and 2007. The Regulations governing the violations at issue are found in the 2002 through 2007 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2002-2007)). The 2010 Regulations establish the procedures that apply to this matter.

² 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, *et seq.*) (“IEEPA”).

Accordingly, Akrion is hereby notified that an administrative proceeding is instituted against it pursuant to 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 the greater of \$250,000 per violation, or twice the value of the transaction that is the basis of the violation³;
- Denial of export privileges; and/or
- Exclusion from practice before BIS.

If Akrion 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 Akrion defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Akrion. The Under Secretary for Industry and Security may then impose up to the maximum penalty on the charges in this letter.

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

Akrion is further notified that under the Small Business Regulatory Enforcement Flexibility Act, Akrion 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 Akrion have a proposal to settle this case, Akrion or its 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, Akrion'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 Akrion's answer must be served on BIS at the following address:

Chief Counsel for Industry and Security
Attention: Gregory Michelsen, Esq.
Room H-3839

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

United States Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

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

Sincerely,

Douglas Hassebrock
Director
Office of Export Enforcement

Enclosure

Akron
Proposed Charging Letter
Schedule of Violations

Charge No.	Export Date	Destination	Item Description	ECCN	Order No(s).	Violation
1	6/18/02	Taiwan	Valve and Pump spare parts	2B350	SS919594	15 C.F.R. § 764.2(a)
2	7/25/02	Taiwan	Valve and Pump spare parts	2B350	SS919594	15 C.F.R. § 764.2(a)
3	9/11/02	Taiwan	Valve and Pump spare parts	2B350	SS920015	15 C.F.R. § 764.2(a)
4	11/5/02	Taiwan	Valve and Pump spare parts	2B350	SS920239	15 C.F.R. § 764.2(a)
5	11/22/05	Taiwan	Valve and Pump spare parts	2B350	SS920097	15 C.F.R. § 764.2(a)
6	12/30/02	Taiwan	Valve and Pump spare parts	2B350	SS920445	15 C.F.R. § 764.2(a)
7	1/14/03	Taiwan	Valve and Pump spare parts	2B350	SS920470	15 C.F.R. § 764.2(a)
8	2/13/03	Taiwan	Valve and Pump spare parts	2B350	SS920544	15 C.F.R. § 764.2(a)
9	2/24/03	Taiwan	Valve and Pump spare parts	2B350	SS920544	15 C.F.R. § 764.2(a)
10	3/7/03	Taiwan	Valve and Pump spare parts	2B350	SS920703	15 C.F.R. § 764.2(a)
11	3/12/03	Taiwan	Valve and Pump spare parts	2B350	SS920489	15 C.F.R. § 764.2(a)
12	4/22/03	Taiwan	Valve and Pump spare parts	2B350	SS920925	15 C.F.R. § 764.2(a)
13	4/30/03	Taiwan	Valve and Pump spare parts	2B350	SS920899	15 C.F.R. § 764.2(a)
14	5/1/03	Taiwan	Valve and Pump spare parts	2B350	SS920957	15 C.F.R. § 764.2(a)
15	5/9/03	Taiwan	Valve and Pump spare parts	2B350	SS920899	15 C.F.R. § 764.2(a)
16	8/12/03	Taiwan	Valve and Pump spare parts	2B350	SS920097	15 C.F.R. § 764.2(a)
17	9/19/03	Taiwan	Valve and Pump spare parts	2B350	SS921489	15 C.F.R. § 764.2(a)
18	10/2/03	Taiwan	Valve and Pump spare parts	2B350	SS921556	15 C.F.R. § 764.2(a)
19	10/23/03	Taiwan	Valve and Pump spare parts	2B350	SS921556	15 C.F.R. § 764.2(a)
20	1/28/04	Taiwan	Valve and Pump spare parts	2B350	SS922065	15 C.F.R. § 764.2(a)
21	3/8/04	Taiwan	Valve and Pump spare parts	2B350	SS922273	15 C.F.R. § 764.2(a)
22	4/2/04	Taiwan	Valve and Pump spare parts	2B350	SS922226	15 C.F.R. § 764.2(a)
23	4/8/04	Taiwan	Valve and Pump spare parts	2B350	SS922350	15 C.F.R. § 764.2(a)
24	5/25/04	Taiwan	Valve and Pump spare parts	2B350	SS922556	15 C.F.R. § 764.2(a)
25	6/1/04	Taiwan	Valve and Pump spare parts	2B350	SS922560	15 C.F.R. § 764.2(a)
26	6/2/04	Taiwan	Valve and Pump spare parts	2B350	SS922505	15 C.F.R. § 764.2(a)
27	6/3/04	Taiwan	Valve and Pump spare parts	2B350	SS922686	15 C.F.R. § 764.2(a)
28	6/14/04	Taiwan	Valve and Pump spare parts	2B350	SS922560	15 C.F.R. § 764.2(a)
29	6/15/04	Taiwan	Valve and Pump spare parts	2B350	SS922180	15 C.F.R. § 764.2(a)
30	6/18/04	Taiwan	Valve and Pump spare parts	2B350	SS922786	15 C.F.R. § 764.2(a)
31	6/25/04	Taiwan	Valve and Pump spare parts	2B350	SS922811	15 C.F.R. § 764.2(a)
32	7/23/04	Taiwan	Valve and Pump spare parts	2B350	SS922859	15 C.F.R. § 764.2(a)
33	7/26/04	Taiwan	Valve and Pump spare parts	2B350	SS922956	15 C.F.R. § 764.2(a)
34	8/26/04	Taiwan	Valve and Pump spare parts	2B350	SS922655	15 C.F.R. § 764.2(a)
35	9/9/04	Taiwan	Valve and Pump spare parts	2B350	SS922795	15 C.F.R. § 764.2(a)
36	10/5/04	Taiwan	Valve and Pump spare parts	2B350	SS923317	15 C.F.R. § 764.2(a)
37	12/7/04	Taiwan	Valve and Pump spare parts	2B350	SS923085	15 C.F.R. § 764.2(a)
38	12/16/04	Taiwan	Valve and Pump spare parts	2B350	SS923611	15 C.F.R. § 764.2(a)
39	12/17/04	Taiwan	Valve and Pump spare parts	2B350	SS923415	15 C.F.R. § 764.2(a)
40	1/12/05	Taiwan	Valve and Pump spare parts	2B350	SS923698	15 C.F.R. § 764.2(a)
41	3/8/05	Taiwan	Valve and Pump spare parts	2B350	SS923698	15 C.F.R. § 764.2(a)
42	3/9/05	Taiwan	Valve and Pump spare parts	2B350	SS923415	15 C.F.R. § 764.2(a)
43	3/9/05	Taiwan	Valve and Pump spare parts	2B350	SS923627	15 C.F.R. § 764.2(a)
44	3/31/05	Taiwan	Valve and Pump spare parts	2B350	SS923882	15 C.F.R. § 764.2(a)
45	5/11/05	Taiwan	Valve and Pump spare parts	2B350	SS923902	15 C.F.R. § 764.2(a)
46	7/8/05	Taiwan	Valve and Pump spare parts	2B350	SS924585	15 C.F.R. § 764.2(a)
47	7/13/05	Taiwan	Valve and Pump spare parts	2B350	SS924463	15 C.F.R. § 764.2(a)
48	7/18/05	Taiwan	Valve and Pump spare parts	2B350	SS924541	15 C.F.R. § 764.2(a)
49	7/1/05	Taiwan	Valve and Pump spare parts	2B350	SS924645	15 C.F.R. § 764.2(a)
50	8/1/05	Taiwan	Valve and Pump spare parts	2B350	SS924464	15 C.F.R. § 764.2(a)
51	8/15/05	Taiwan	Valve and Pump spare parts	2B350	SS924464	15 C.F.R. § 764.2(a)
52	8/16/05	Taiwan	Valve and Pump spare parts	2B350	SS924541	15 C.F.R. § 764.2(a)
53	8/23/05	Taiwan	Valve and Pump spare parts	2B350	SS924463	15 C.F.R. § 764.2(a)
54	8/30/05	Taiwan	Valve and Pump spare parts	2B350	SS924541/SS924684	15 C.F.R. § 764.2(a)
55	9/1/05	Taiwan	Valve and Pump spare parts	2B350	SS924541	15 C.F.R. § 764.2(a)
56	9/14/05	Taiwan	Valve and Pump spare parts	2B350	SS924684	15 C.F.R. § 764.2(a)
57	9/22/05	Taiwan	Valve and Pump spare parts	2B350	SS924937	15 C.F.R. § 764.2(a)
58	9/23/05	Taiwan	Valve and Pump spare parts	2B350	SS924913	15 C.F.R. § 764.2(a)
59	10/14/05	Taiwan	Valve and Pump spare parts	2B350	SS924937	15 C.F.R. § 764.2(a)
60	10/17/05	Taiwan	Valve and Pump spare parts	2B350	SS925006	15 C.F.R. § 764.2(a)
61	10/21/05	Taiwan	Valve and Pump spare parts	2B350	SS924839	15 C.F.R. § 764.2(a)
62	10/28/05	Taiwan	Valve and Pump spare parts	2B350	SS924839	15 C.F.R. § 764.2(a)
63	11/1/05	Taiwan	Valve and Pump spare parts	2B350	SS924463	15 C.F.R. § 764.2(a)
64	11/2/05	Taiwan	Valve and Pump spare parts	2B350	SS924913	15 C.F.R. § 764.2(a)
65	11/8/05	Taiwan	Valve and Pump spare parts	2B350	SS924948	15 C.F.R. § 764.2(a)
66	11/11/05	Taiwan	Valve and Pump spare parts	2B350	SS925419	15 C.F.R. § 764.2(a)
67	11/17/05	Taiwan	Valve and Pump spare parts	2B350	SS925420	15 C.F.R. § 764.2(a)
68	11/28/05	Taiwan	Valve and Pump spare parts	2B350	SS924840	15 C.F.R. § 764.2(a)
69	12/16/05	Taiwan	Valve and Pump spare parts	2B350	SS05R041	15 C.F.R. § 764.2(a)
70	12/28/05	Taiwan	Valve and Pump spare parts	2B350	SS925313	15 C.F.R. § 764.2(a)
71	1/9/06	Taiwan	Valve and Pump spare parts	2B350	SS924786	15 C.F.R. § 764.2(a)
72	2/17/06	Taiwan	Valve and Pump spare parts	2B350	SS926193	15 C.F.R. § 764.2(a)
73	3/28/06	Taiwan	Valve and Pump spare parts	2B350	SS06R042	15 C.F.R. § 764.2(a)
74	4/19/06	Taiwan	Valve and Pump spare parts	2B350	SS06R042	15 C.F.R. § 764.2(a)

Akron
Proposed Charging Letter
Schedule of Violations

Charge No.	Export Date	Destination	Item Description	ECCN	Order No(s).	Violation
75	5/24/06	Taiwan	Valve and Pump spare parts	2B350	SS06R042	15 C.F.R. § 764.2(a)
76	6/9/06	Taiwan	Valve and Pump spare parts	2B350	SS926053	15 C.F.R. § 764.2(a)
77	6/16/06	Taiwan	Valve and Pump spare parts	2B350	SS06R042	15 C.F.R. § 764.2(a)
78	7/27/06	Taiwan	Valve and Pump spare parts	2B350	SS06R042	15 C.F.R. § 764.2(a)
79	8/10/06	Taiwan	Valve and Pump spare parts	2B350	SS926053	15 C.F.R. § 764.2(a)
80	8/15/06	Taiwan	Valve and Pump spare parts	2B350	SS06R042	15 C.F.R. § 764.2(a)
81	2/14/07	Taiwan	Valve and Pump spare parts	2B350	SS930214	15 C.F.R. § 764.2(a)
82	2/22/07	Taiwan	Valve and Pump spare parts	2B350	SS930514/SS930515	15 C.F.R. § 764.2(a)
83	4/5/07	Taiwan	Valve and Pump spare parts	2B350	SS930214	15 C.F.R. § 764.2(a)
84	5/2/07	Taiwan	Valve and Pump spare parts	2B350	SS926053	15 C.F.R. § 764.2(a)
85	7/3/07	Taiwan	Valve and Pump spare parts	2B350	SS931860	15 C.F.R. § 764.2(a)
86	7/18/07	Taiwan	Valve and Pump spare parts	2B350	SS930515	15 C.F.R. § 764.2(a)
87	7/20/07	Taiwan	Valve and Pump spare parts	2B350	SS930514	15 C.F.R. § 764.2(a)
88	7/27/07	Taiwan	Valve and Pump spare parts	2B350	SS07R042	15 C.F.R. § 764.2(a)
89	8/27/07	Taiwan	Valve and Pump spare parts	2B350	SS931860	15 C.F.R. § 764.2(a)
90	4/28/05	Singapore	Valve and Pump spare parts	2B350	SS924180	15 C.F.R. § 764.2(a)
91	6/15/05	Singapore	Valve and Pump spare parts	2B350	SS924480	15 C.F.R. § 764.2(a)
92	7/5/05	Singapore	Valve and Pump spare parts	2B350	SS924559	15 C.F.R. § 764.2(a)
93	8/1/05	Singapore	Valve and Pump spare parts	2B350	SS924642	15 C.F.R. § 764.2(a)
94	8/5/05	Singapore	Valve and Pump spare parts	2B350	SS924562	15 C.F.R. § 764.2(a)
95	8/12/05	Singapore	Valve and Pump spare parts	2B350	SS924706	15 C.F.R. § 764.2(a)
96	12/13/05	Singapore	Valve and Pump spare parts	2B350	SS05R040	15 C.F.R. § 764.2(a)
97	1/2/06	Singapore	Valve and Pump spare parts	2B350	SS05R040	15 C.F.R. § 764.2(a)
98	1/23/06	Singapore	Valve and Pump spare parts	2B350	SS926271	15 C.F.R. § 764.2(a)
99	1/28/06	Singapore	Valve and Pump spare parts	2B350	SS06R040	15 C.F.R. § 764.2(a)
100	2/4/06	Singapore	Valve and Pump spare parts	2B350	SS06R040	15 C.F.R. § 764.2(a)
101	4/27/06	Singapore	Valve and Pump spare parts	2B350	SS06R040	15 C.F.R. § 764.2(a)
102	5/8/06	Singapore	Valve and Pump spare parts	2B350	SS06R040	15 C.F.R. § 764.2(a)
103	5/22/06	Singapore	Valve and Pump spare parts	2B350	SS927602	15 C.F.R. § 764.2(a)
104	9/13/06	Singapore	Valve and Pump spare parts	2B350	SS926160	15 C.F.R. § 764.2(a)
105	10/10/06	Singapore	Valve and Pump spare parts	2B350	SS928790	15 C.F.R. § 764.2(a)
106	10/20/06	Singapore	Valve and Pump spare parts	2B350	SS929070	15 C.F.R. § 764.2(a)
107	3/27/07	Singapore	Valve and Pump spare parts	2B350	SS930974	15 C.F.R. § 764.2(a)
108	4/13/07	Singapore	Valve and Pump spare parts	2B350	SS931013	15 C.F.R. § 764.2(a)
109	5/29/07	Singapore	Valve and Pump spare parts	2B350	SS07R040	15 C.F.R. § 764.2(a)
110	5/31/07	Singapore	Valve and Pump spare parts	2B350	SS07R040	15 C.F.R. § 764.2(a)
111	7/18/07	Singapore	Valve and Pump spare parts	2B350	SS07R040	15 C.F.R. § 764.2(a)
112	7/1/05	Malaysia	Valve and Pump spare parts	2B350	SS924405	15 C.F.R. § 764.2(a)
113	8/30/05	Malaysia	Valve and Pump spare parts	2B350	SS924569/924193	15 C.F.R. § 764.2(a)
114	9/2/05	Malaysia	Valve and Pump spare parts	2B350	SS924405	15 C.F.R. § 764.2(a)
115	9/2/05	Malaysia	Valve and Pump spare parts	2B350	SS924193	15 C.F.R. § 764.2(a)
116	9/19/05	Malaysia	Valve and Pump spare parts	2B350	SS924341	15 C.F.R. § 764.2(a)
117	9/22/05	Malaysia	Valve and Pump spare parts	2B350	SS924405	15 C.F.R. § 764.2(a)
118	10/8/05	Malaysia	Valve and Pump spare parts	2B350	SS924842/SS924843/924844	15 C.F.R. § 764.2(a)
119	10/26/05	Malaysia	Valve and Pump spare parts	2B350	SS925028	15 C.F.R. § 764.2(a)
120	11/22/05	Malaysia	Valve and Pump spare parts	2B350	SS925633	15 C.F.R. § 764.2(a)
121	12/16/05	Malaysia	Valve and Pump spare parts	2B350	SS05R041	15 C.F.R. § 764.2(a)
122	1/10/06	Malaysia	Valve and Pump spare parts	2B350	SS6R041	15 C.F.R. § 764.2(a)
123	1/17/06	Malaysia	Valve and Pump spare parts	2B350	SS925633	15 C.F.R. § 764.2(a)
124	1/26/06	Malaysia	Valve and Pump spare parts	2B350	SS06R041	15 C.F.R. § 764.2(a)
125	2/7/06	Malaysia	Valve and Pump spare parts	2B350	SS924957	15 C.F.R. § 764.2(a)
126	2/7/06	Malaysia	Valve and Pump spare parts	2B350	SS06R041	15 C.F.R. § 764.2(a)
127	2/17/06	Malaysia	Valve and Pump spare parts	2B350	SS06R041	15 C.F.R. § 764.2(a)
128	3/11/06	Malaysia	Valve and Pump spare parts	2B350	SS06R041	15 C.F.R. § 764.2(a)
129	3/17/06	Malaysia	Valve and Pump spare parts	2B350	SS06R041	15 C.F.R. § 764.2(a)
130	3/20/06	Malaysia	Valve and Pump spare parts	2B350	SS925398	15 C.F.R. § 764.2(a)
131	3/23/06	Malaysia	Valve and Pump spare parts	2B350	SS06R041	15 C.F.R. § 764.2(a)
132	3/24/06	Malaysia	Valve and Pump spare parts	2B350	SS925181	15 C.F.R. § 764.2(a)
133	3/24/06	Malaysia	Valve and Pump spare parts	2B350	SS06R041	15 C.F.R. § 764.2(a)
134	4/12/06	Malaysia	Valve and Pump spare parts	2B350	SS06R041	15 C.F.R. § 764.2(a)
135	4/17/06	Malaysia	Valve and Pump spare parts	2B350	SS06R041	15 C.F.R. § 764.2(a)
136	4/20/06	Malaysia	Valve and Pump spare parts	2B350	SS924341	15 C.F.R. § 764.2(a)
137	5/23/06	Malaysia	Valve and Pump spare parts	2B350	SS06R041	15 C.F.R. § 764.2(a)
138	9/21/06	Malaysia	Valve and Pump spare parts	2B350	SS924569	15 C.F.R. § 764.2(a)
139	12/4/06	Malaysia	Valve and Pump spare parts	2B350	SS06R041	15 C.F.R. § 764.2(a)
140	1/22/07	Malaysia	Valve and Pump spare parts	2B350	SS924341	15 C.F.R. § 764.2(a)
141	8/20/07	Malaysia	Valve and Pump spare parts	2B350	SS930158	15 C.F.R. § 764.2(a)
142	12/23/02	China	Valve and Pump spare parts	2B350	SS920321	15 C.F.R. § 764.2(a)
143	12/2/05	China	Valve and Pump spare parts	2B350	SS925383	15 C.F.R. § 764.2(a)
144	8/2/06	China	Valve and Pump spare parts	2B350	SS928163	15 C.F.R. § 764.2(a)