

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

In the Matter of:

Robbins & Myers Belgium S.A.
Avenue Mercury 3, Zoning Industrie
De Petit-Rehain
B-4655 Chaineux, Belgium

Respondent

ORDER RELATING TO
ROBBINS & MYERS BELGIUM S.A.

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Robbins & Myers Belgium S.A., of Chaineux, Belgium (“R&M Belgium”), of its intentions to initiate an administrative proceeding against R&M Belgium 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 R&M Belgium that alleges that R&M Belgium committed seven 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 (2014). The charged violations occurred in 2006. The Regulations governing the violations at issue are found in the 2006 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774). The 2014 Regulations set forth the procedures that apply to this matter.

² 50 U.S.C. app. §§ 2401-2420. 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 7, 2014 (79 Fed. Reg. 49,959 (August 11, 2014)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*) (2006 & Supp. IV 2010).

Charges 1-3 15 C.F.R. § 764.2(a): Engaging in Prohibited Conduct by Reexporting Items for Power Sections Used in Oil and Gas Drilling and Exploration to Syria, without the Required Licenses

On three occasions, between on or about February 9, 2006, and on or about June 21, 2006, R&M Belgium engaged in conduct prohibited by the Regulations by reexporting stators, items subject to the Regulations, designated EAR99, and valued at approximately \$35,047, from Belgium to Syria.³ The stators are heat-treated special alloy tubes, lined with helical-shaped rubber inserts. When combined with rotors and other components, they form a power section, which is used in oil and gas drilling and exploration. Pursuant to General Order No. 2 of May 14, 2004, set forth in Supplement No. 1 to Part 736 of the Regulations (2006), authorization was required from BIS before the items could be reexported to Syria. No such license was obtained for the reexports described herein.

In so doing, R&M Belgium committed three violations of Section 764.2(a) of the Regulations.

Charges 4-7 15 C.F.R. § 764.2(e): Acting with Knowledge of a Violation

On four occasions between on or about August 22, 2006, and on or about October 31, 2006, R&M Belgium sold and transferred items subject to the Regulations with knowledge that a violation of the Regulations had occurred, was about to occur or was intended to occur in connection with the items. Specifically, R&M Belgium sold and transferred stators, items subject to the Regulations, designated as EAR99 items, and valued at approximately \$31,716, to a customer in Syria, with knowledge that U.S. Government authorization was required to reexport the items but had not been obtained.⁴ R&M Belgium knew that a violation of the Regulations was about or intended to occur because, inter alia, in or about June 2006, R&M Belgium's U.S. parent, Robbins & Myers, Inc. of Willis, Texas, had been informed by its outside counsel that U.S. export regulations could apply to reexports to Syria because the items had more than a *de minimis* amount of U.S. content and the reexports could constitute violations of U.S. export control law. This information was provided to R&M Belgium on or about June 29, 2006, that is, almost two months prior to the reexport to Syria that occurred on or about August 22, 2006.

Furthermore, in September 2006, R&M Belgium agreed to remove "all details about Syria" from correspondence sent to its customer's U.S. office, in order to conceal the fact

³ The foreign-made items at issue are subject to the Regulations because they incorporate more than a *de minimis* amount of controlled U.S.-origin content. See 15 C.F.R. §§ 734.3(a)(3) and 734.4 (2006). EAR99 is a designation for items subject to the Regulations but not listed on the Commerce Control List. 15 C.F.R. § 734.3(c) (2006).

⁴ See footnote 3, *supra*.

that the stators reexported on or about September 11 and 29, 2006, respectively, were destined for Syria. In connection with the October 31, 2006 reexport from Belgium to Syria, R&M Belgium agreed to a scheme with its European-based customer to "Mark SYRIA as DUBAI" (emphasis in original) on shipping documents, in order to make it appear that the item was destined for the United Arab Emirates and conceal from the customer's U.S. offices that the item actually was destined for Syria.

Pursuant to General Order No. 2 of May 14, 2004, set forth in Supplement No. 1 to Part 736 of the Regulations (2006), authorization was required from BIS before the items could be reexported to Syria. No such license was obtained for the reexports described herein.

In so doing, R&M Belgium committed four violations of Section 764.2(e) of the Regulations.

WHEREAS, BIS and R&M Belgium 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, R&M Belgium shall be assessed a civil penalty in the amount of \$600,000, the payment of which shall be made to the U.S. Department of Commerce within 30 days of the date of this Order.

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 date specified herein, R&M Belgium 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 R&M Belgium. Accordingly, if R&M Belgium should fail to pay the civil penalty in a full and timely manner, the undersigned may issue an order denying all of R&M Belgium'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 7th day of October, 2014.

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

In the Matter of:

Robbins & Myers Belgium S.A.
Avenue Mercury 3, Zoning Industrie
De Petit-Rehain
B-4655 Chaineux, Belgium

Respondent

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Robbins & Myers Belgium S.A., of Chaineux, Belgium (“R&M Belgium”), 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, BIS has notified R&M Belgium of its intentions to initiate an administrative proceeding against R&M Belgium, 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 (2014). The charged violations occurred in 2006. The Regulations governing the violations at issue are found in the 2006 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774). The 2014 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 15, 2012 (77 Fed. Reg. 49699 (Aug. 16, 2012)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.* (2006 & Supp. IV 2010)).

WHEREAS, BIS has issued a Proposed Charging Letter to R&M Belgium that alleges that R&M Belgium committed seven violations of the Regulations, specifically:

Charges 1-3 15 C.F.R. § 764.2(a): Engaging in Prohibited Conduct by Reexporting Items for Power Sections Used in Oil and Gas Drilling and Exploration to Syria, without the Required Licenses

On three occasions, between on or about February 9, 2006, and on or about June 21, 2006, R&M Belgium engaged in conduct prohibited by the Regulations by reexporting stators, items subject to the Regulations, designated EAR99, and valued at approximately \$35,047, from Belgium to Syria.³ The stators are heat-treated special alloy tubes, lined with helical-shaped rubber inserts. When combined with rotors and other components, they form a power section, which is used in oil and gas drilling and exploration. Pursuant to General Order No. 2 of May 14, 2004, set forth in Supplement No. 1 to Part 736 of the Regulations (2006), authorization was required from BIS before the items could be reexported to Syria. No such license was obtained for the reexports described herein.

In so doing, R&M Belgium committed three violations of Section 764.2(a) of the Regulations.

Charges 4-7 15 C.F.R. § 764.2(e): Acting with Knowledge of a Violation

On four occasions between on or about August 22, 2006, and on or about October 31, 2006, R&M Belgium sold and transferred items subject to the Regulations with knowledge that a violation of the Regulations had occurred, was about to occur or was intended to occur in connection with the items. Specifically, R&M Belgium sold and transferred stators, items subject to the Regulations, designated as EAR99 items, and valued at approximately \$31,716, to a customer in Syria, with knowledge that U.S. Government authorization was required to reexport the items but had not been obtained.⁴ R&M Belgium knew that a violation of the Regulations was about or intended to occur because, inter alia, in or about June 2006, R&M Belgium's U.S. parent, Robbins & Myers, Inc. of Willis, Texas, had been informed by its outside counsel that U.S. export regulations could apply to reexports to Syria because the items had more than a *de minimis* amount of U.S. content and the reexports could constitute violations of U.S. export control law. This information was provided to R&M Belgium on or about June 29,

³ The foreign-made items at issue are subject to the Regulations because they incorporate more than a *de minimis* amount of controlled U.S.-origin content. See 15 C.F.R. §§ 734.3(a)(3) and 734.4 (2006). EAR99 is a designation for items subject to the Regulations but not listed on the Commerce Control List. 15 C.F.R. § 734.3(c) (2006).

⁴ See footnote 3, *supra*.

2006, that is, almost two months prior to the reexport to Syria that occurred on or about August 22, 2006.

Furthermore, in September 2006, R&M Belgium agreed to remove "all details about Syria" from correspondence sent to its customer's U.S. office, in order to conceal the fact that the stators reexported on or about September 11 and 29, 2006, respectively, were destined for Syria. In connection with the October 31, 2006 reexport from Belgium to Syria, R&M Belgium agreed to a scheme with its European-based customer to "Mark SYRIA as DUBAI" (emphasis in original) on shipping documents, in order to make it appear that the item was destined for the United Arab Emirates and conceal from the customer's U.S. offices that the item actually was destined for Syria.

Pursuant to General Order No. 2 of May 14, 2004, set forth in Supplement No. 1 to Part 736 of the Regulations (2006), authorization was required from BIS before the items could be reexported to Syria. No such license was obtained for the reexports described herein.

In so doing, R&M Belgium committed four violations of Section 764.2(e) of the Regulations.

WHEREAS, R&M Belgium 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, R&M Belgium 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, R&M Belgium enters into this Agreement voluntarily and with full knowledge of its rights, after having consulted with counsel;

WHEREAS, the Parties enter into this Agreement having taken into consideration a plea agreement entered by R&M Belgium in the U.S. District Court for the District of Columbia;

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

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

WHEREAS, R&M Belgium 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 R&M Belgium, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.
2. R&M Belgium admits the allegations contained in the Proposed Charging Letter.
3. The following sanctions shall be imposed against R&M Belgium in complete settlement of the alleged violations of the Regulations relating to the transactions specifically detailed in the Proposed Charging Letter:
 - a. R&M Belgium shall be assessed a civil penalty in the amount of \$600,000, the payment of which shall be made to the U.S. Department of Commerce within 30 days of the date of the Order. Payment shall be made in the manner specified in the attached instructions.
 - b. The full and timely payment of the civil penalty agreed to in Paragraph 3.a 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 R&M Belgium. Failure to make full and timely payment of the civil penalty may result in the denial of all of R&M Belgium's export privileges under the Regulations for one year from the date of the failure to make such payment.

4. Subject to the approval of this Agreement pursuant to Paragraph 8 hereof, R&M Belgium 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. R&M Belgium 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 R&M Belgium pays in full the civil penalty agreed to in Paragraph 3.a of this Agreement.

5. BIS agrees that upon full and timely payment of the civil penalty as set forth in Paragraph 3.a, BIS will not initiate any further administrative proceeding against R&M Belgium in connection with any violation of the Act or the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter.

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 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.

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

10. 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

ROBBINS & MYERS BELGIUM S.A.

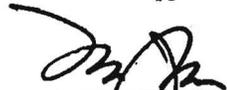


David Ray
Operations Manager
Robbins & Myers Belgium S.A.

Date: 9/26/14

Date: 7th AUGUST 2014

Reviewed and approved by:



Tim Johnson, Esq.
Locke Lord LLP
Counsel for Robbins & Myers Belgium S.A.

Date: 9.15.14

PROPOSED CHARGING LETTER

REGISTERED MAIL - RETURN RECEIPT REQUESTED

Robbins & Myers Belgium S.A.
Avenue Mercury 3, Zoning Industrie
De Petit-Rehain
B-4655 Chaineux, Belgium

Attention: David Ray, Operations Manager

Dear Mr. Ray:

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that Robbins & Myers Belgium S.A., of Chaineux, Belgium (“R&M Belgium”) has committed seven violations of the Export Administration Regulations (the “Regulations”),¹ which issued under the authority of the Export Administration Act of 1979, as amended (the “Act”).² Specifically, BIS alleges that R&M Belgium committed the following violations:

Charges 1-3 15 C.F.R. § 764.2(a): Engaging in Prohibited Conduct by Reexporting Items for Power Sections Used in Oil and Gas Drilling and Exploration to Syria, without the Required Licenses

As described in greater detail in the attached Schedule of Violations, which is incorporated herein by reference, on three occasions, between on or about February 9, 2006, and on or about June 21, 2006, R&M Belgium engaged in conduct prohibited by the Regulations by reexporting stators, items subject to the Regulations, designated EAR99, and valued at approximately \$35,047, from Belgium to Syria.³ The stators are

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2014). The violations alleged occurred in 2006. The Regulations governing the violations at issue are found in the 2006 version of the Code of Federal Regulations, 15 C.F.R. Parts 730-774 (2006). The 2014 Regulations govern the procedural aspects of this case.

² 50 U.S.C. app. §§ 2401-2420. 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 7, 2014 (79 Fed. Reg. 49,959 (August 11, 2014)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*) (2006 & Supp. IV 2010).

³ The foreign-made items at issue are subject to the Regulations because they incorporate more than a *de minimis* amount of controlled U.S.-origin content. See 15 C.F.R.

heat-treated special alloy tubes, lined with helical-shaped rubber inserts. When combined with rotors and other components, they form a power section, which is used in oil and gas drilling and exploration. Pursuant to General Order No. 2 of May 14, 2004, set forth in Supplement No. 1 to Part 736 of the Regulations (2006), authorization was required from BIS before the items could be reexported to Syria. No such license was obtained for the reexports described herein.

In so doing, R&M Belgium committed three violations of Section 764.2(a) of the Regulations.

Charges 4-7 15 C.F.R. § 764.2(e): Acting with Knowledge of a Violation

As described in greater detail in the attached Schedule of Violations, which is incorporated herein by reference, on four occasions between on or about August 22, 2006, and on or about October 31, 2006, R&M Belgium sold and transferred items subject to the Regulations with knowledge that a violation of the Regulations had occurred, was about to occur or was intended to occur in connection with the items. Specifically, R&M Belgium sold and transferred stators, items subject to the Regulations, designated as EAR99 items, and valued at approximately \$31,716, to a customer in Syria, with knowledge that U.S. Government authorization was required to reexport the items but had not been obtained.⁴ R&M Belgium knew that a violation of the Regulations was about or intended to occur because, inter alia, in or about June 2006, R&M Belgium's U.S. parent, Robbins & Myers, Inc. of Willis, Texas, had been informed by its outside counsel that U.S. export regulations could apply to reexports to Syria because the items had more than a *de minimis* amount of U.S. content and the reexports could constitute violations of U.S. export control law. This information was provided to R&M Belgium on or about June 29, 2006, that is, almost two months prior to the reexport to Syria that occurred on or about August 22, 2006.

Furthermore, in September 2006, R&M Belgium agreed to remove "all details about Syria" from correspondence sent to its customer's U.S. office, in order to conceal the fact that the stators reexported on or about September 11 and 29, 2006, respectively, were destined for Syria. In connection with the October 31, 2006 reexport from Belgium to Syria, R&M Belgium agreed to a scheme with its European-based customer to "Mark SYRIA as DUBAI" (emphasis in original) on shipping documents, in order to make it appear that the item was destined for the United Arab Emirates and conceal from the customer's U.S. offices that the item actually was destined for Syria.

Pursuant to General Order No. 2 of May 14, 2004, set forth in Supplement No. 1 to Part 736 of the Regulations (2006), authorization was required from BIS before the items

§§ 734.3(a)(3) and 734.4 (2006). EAR99 is a designation for items subject to the Regulations but not listed on the Commerce Control List. 15 C.F.R. § 734.3(c) (2006).

⁴ See footnote 3, *supra*.

could be reexported to Syria. No such license was obtained for the reexports described herein.

In so doing, R&M Belgium committed four violations of Section 764.2(e) of the Regulations.

* * * * *

Accordingly, R&M Belgium is hereby notified that an administrative proceeding is instituted against it pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including, but not limited to 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 violation;⁵
- Denial of export privileges; and/or
- Exclusion from practice before BIS.

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

R&M Belgium is further notified that it is entitled to an agency hearing on the record if it files a written demand for one with its answer. *See* 15 C.F.R. § 766.6. R&M Belgium 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.

The Regulations provide for settlement without a hearing. *See* 15 C.F.R. § 766.18. Should R&M Belgium have a proposal to settle this case, R&M Belgium should transmit it to the attorney representing BIS named below.

R&M Belgium is further notified that under the Small Business Regulatory Enforcement Flexibility ACT, R&M Belgium 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/>.

⁵ *See* International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

Robbins & Myers Belgium, S.A.
Proposed Charging Letter
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The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, R&M Belgium's answer must be filed in accordance with the instructions 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 R&M Belgium's answer must be served on BIS at the following address:

Chief Counsel for Industry and Security
Attention: R. Elizabeth Abraham
Room H-3839
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

R. Elizabeth Abraham is the attorney representing BIS in this case; any communications that R&M Belgium may wish to have concerning this matter should occur through her. Ms. Abraham may be contacted by telephone at (202) 482-8050.

Sincerely,

Douglas R. Hassebrock
Director
Office of Export Enforcement

Robbins & Myers Belgium, S.A.
Proposed Charging Letter
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Charge No.	Reexport Date	Destination	Items	ECCN	Value	Violation
1	2/9/2006	Syria	Stators	EAR99	\$17,322.24	15 CFR § 764.2(a)
2	4/20/2006	Syria	Stators	EAR99	\$11,406.72	15 CFR § 764.2(a)
3	6/21/2006	Syria	Stators	EAR99	\$6,318.68	15 CFR § 764.2(a)
4	8/22/2006	Syria	Stator	EAR99	\$4,523.28	15 CFR § 764.2(e)
5	9/11/2006	Syria	Stators	EAR99	\$11,406.72	15 CFR § 764.2(e)
6	9/29/2006	Syria	Stators	EAR99	\$11,169.08	15 CFR § 764.2(e)
7	10/31/2006	Syria	Stator	EAR99	\$4,617.28	15 CFR § 764.2(e)

