

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

**Streit Group FZE**  
PO Box 10559, Technology Park  
Ras Al Khaimah, Free Trade Zone  
United Arab Emirates

and

**Streit Middle East FZCO**  
PO Box 262051  
Jebel Ali Free Zone  
Dubai, United Arab Emirates

Respondents

**ORDER RELATING TO STREIT GROUP FZE AND  
STREIT MIDDLE EAST FZCO**

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Streit Group FZE, of Ras Al Khaimah, United Arab Emirates, and Streit Middle East FZCO, of Dubai, United Arab Emirates (“Streit Middle East”), of its intention to initiate an administrative proceeding against Streit Group FZE and Streit Middle East 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>

<sup>1</sup> The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2015). The charged violations occurred in 2009. The Regulations governing the violations at issue are found in the 2009 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2009)). The 2015 version of the Regulations govern the procedural aspects of this case.

<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)), which has been extended by successive Presidential Notices, the

through the issuance of a Proposed Charging Letter to Streit Group FZE and Streit Middle East that alleges that Streit Group FZE and Streit Middle East committed the following violations of the Regulations:

*As both to Streit Group FZE and Streit Middle East:*

**Charges 1 – 4:                    15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation.**

Between in or about August 2009, and in or about September 2009, Streit Group FZE and Streit Middle East engaged in a series of transactions in which they sold and/or transferred U.S.-origin vehicles retrofitted with ballistic steel and bullet proof glass with knowledge that a violation of the Regulations had occurred, was occurring, or was about to occur in connection with the items. The armored vehicles were subject to the Regulations and had been exported from the United States, were classified under Export Control Classification Number 9A018, and were valued in total at approximately \$1,127,050.

The items had been exported to Streit Middle East in the UAE by Streit USA Armoring, LLC (“Streit USA”), pursuant to a BIS license dated December 7, 2007, under which Streit Middle East was designated as the authorized intermediate and ultimate consignee. The license as issued covered a certain maximum number of armored vehicles effective through December 31, 2009, and included a license condition providing that no resale, transfer, or reexport of the items was permitted without prior U.S. Government authorization. Streit Middle East and Streit USA both have at all times pertinent hereto been subsidiaries of Streit Group FZE; and all three of these Streit Group entities had all times pertinent hereto the same chairman and chief executive officer (“CEO”), Guerman Goutorov, who also was the sole or majority owner of each of them.

Streit Middle East and Streit Group FZE learned of this license condition no later than in or about July 2009. On July 23, 2009, Streit USA’s export licensing coordinator sent to Chairman/CEO Goutorov and several Streit Group employees a “Streit USA Armoring End User Request Form,” which read in pertinent part:

Please provide the following information to Streit USA Armoring for submission to the DOC [Department of Commerce], and wait for approval prior to any sale, transfer, or reexport of US produced armored SUVs.

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most recent being that of August 7, 2014 (79 Fed. Reg. 46,959 (Aug. 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).

Only after approval has been given, in writing, to Streit USA Armoring from the DOC for an approved sale, may the sale proceed.

Shortly thereafter, on July 27, 2009, Streit USA's export licensing coordinator further stated via email to Chairman/CEO Goutorov and several Streit Group employees, including Streit Group FZE's director of sales and marketing, that:

[T]here are no exceptions to getting approval for the resale of the vehicles. Even a direct sale to the US military would still require an approval from the US Department of Commerce and Department of Defense. Please continue to search out where the previously sold vehicles are, as this becomes more important every day. It is highly likely that we will be fined for each truck, which has been shipped, that we do not have proper approval for. These fines can be as much as twice the value of each truck . . . .

Despite knowing of the prohibitions contained in the license condition and that violations of them were subject to potential monetary penalties, Streit Middle East sold or transferred the items without the required authorization on four occasions to Streit Group FZE for resale and/or reexport, which, in turn, sold and/or reexported the items without the required U.S. Government authorization.

The first of these unauthorized transactions occurred in connection with a reexport to Iraq that occurred on or about August 18, 2009. Streit Group FZE informed Streit USA on August 10, 2009, that it had resold and would be reexporting eight armored vehicles to Iraq. On August 19, 2009, Streit USA's export licensing coordinator reiterated, via email, to Chairman/CEO Goutorov and Streit Group FZE's director of sales and marketing, as well as to Eric Carlson, Streit USA's vice president, operations, that "our license . . . agreement states, the resale/re-export of these vehicles must be approved by the [D]epartment of Commerce in the USA . . . . I have gone ahead and applied for your re-export license, but it has not been returned as of 8/19/09, with approval. These vehicles should remain in Dubai until the proper authorization has been received from the US government." Streit Group FZE's director of sales and marketing replied to Carlson and Goutorov, "Eric, Guerman – if we follow the rules . . . we have to stop [armored Chevrolet S]uburban sales."

The Streit Group companies did not stop their sales or other activities in knowing violation of the license condition and the Regulations. Streit Group FZE engaged in the August 18, 2009 reexport to Iraq of armored vehicles valued at \$687,050, notwithstanding the warnings conveyed on July 23 and 27, 2009. Shortly thereafter, on September 6, 2009, Streit Group FZE reexported an armored vehicle valued at \$90,000 to the Philippines, notwithstanding the additional warning it received on August 19, 2009. Moreover, on or about September 3 and September 13, 2009, respectively, Streit Group FZE signed contracts for the sale of a total of four armored vehicles for reexport to Singapore. The items were valued in total at \$350,000.

Streit Middle East and Streit Group FZE knew of the license condition that applied to the items and their actions described above, but did not obtain the required prior U.S. Government authorization for any of them, whether involving the transfer or sale of the items from Streit Middle East to Streit Group FZE, or the sale, transfer or reexport of the items by Streit Middle East or Streit Group FZE to third parties.

In so doing, Streit Group FZE and Streit Middle East committed four violations of Section 764.2(e) of the Regulations and are joint and severally liable for those violations.

As to Streit Middle East:

**Charges 5 – 6: 15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation.**

On two occasions between on or about August 23, 2009, and on or about November 8, 2009, Streit Middle East engaged in a series of transactions in which it sold and/or transferred U.S.-origin vehicles retrofitted with ballistic steel and bullet proof glass with knowledge that a violation of the Regulations had occurred, was occurring, or was about to occur in connection with the items. The armored vehicles were subject to the Regulations and had been exported from the United States, were classified under Export Control Classification Number 9A018, and were valued in total at approximately \$679,200.

Streit Middle East knew that prior U.S. Government authorization was required for the resale and reexport of the items from the warnings conveyed to it by Streit USA on July 23, July 27, and August 19, 2009, and described in Charges 1–4 above, which are realleged and incorporated in pertinent part herein. Notwithstanding those warnings, which included a warning that any violations were subject to monetary penalties, Streit Middle East reexported two armored vehicles valued in total at \$168,000 to Nigeria without the required authorization on or about August 23, 2009, and reexported five armored vehicles to the Philippines valued in total at \$426,000 on or about November 8, 2009.

In so doing, Streit Middle East committed two violations of Section 764.2(e) of the Regulations.

As to Streit Group FZE:

**Charge 7: 15 C.F.R. § 764.2(b) – Causing, Aiding, and Abetting a False Statement in connection with a License Application**

In or about January - February 2009, Streit Group FZE caused, aided, abetted, commanded, induced, procured, and/or permitted a false or misleading statement to BIS

in connection with the submission of a license application, an "export control document" as defined in Section 772.1 of the Regulations. Streit Group FZE's U.S. subsidiary, Streit USA, had filed an application with BIS on November 20, 2008, to export 25 armored vehicles from the United States to Venezuela. On January 16, 2009, as part of the interagency license application review process, BIS forwarded certain questions about the application to Streit USA, which Streit USA forwarded to its parent company, Streit Group FZE. Streit Group FZE's international sales manager responded later the same day, stating, "Regarding the request for additional information . . . I think we should advise the Dept[.] of Commerce that the client[']s deadline for importing the vehicles has expired as they needed them by December 31<sup>st</sup>. We don't want to bring any unnecessary attention and they may ask for more information or even . . . contact the client." On or about January 20, 2009, Streit USA's vice president, operations, Eric Carlson, responded by email to Streit Group FZE's international sales manager, as well as its chairman and chief executive officer Guerman Goutorov, stating, "We can advise the Commerce Department that the customer went elsewhere to purchase their armored vehicles due to the fact that it took too long for us to get an export license." Consistent with this scheme, Streit USA falsely stated to BIS on or about February 2, 2009, that the sale had been lost and that the license application should be returned without action. This false statement violated Section 764.2(g) of the Regulations, which prohibits, inter alia, the making of any false or misleading statement or representation to BIS in connection with a license application submitted to BIS. In fact, the sale had not been lost, and Streit USA had already shipped some of the items identified in the license application to Canada on or about December 10, 2008, less than three weeks after the license had been filed, knowing that after their arrival in Canada the items would be transshipped to Venezuela.

In so doing, Streit Group FZE committed one violation of Section 764.2(b) of the Regulations.

WHEREAS, BIS and Streit Group FZE and Streit Middle East 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, Streit Group FZE and Streit Middle East shall jointly and severally be assessed a civil penalty in the amount of \$1,600,000. Streit Group FZE and Streit Middle

East shall pay the U.S. Department of Commerce \$850,000 of this amount in installments as follows: \$284,000 not later than 30 days from the date of this Order; \$283,000 not later than one year from the date of this Order; and \$283,000 not later than two years from the date of this Order. If any of the three (3) installment payments is not fully and timely made, any remaining scheduled installment payments and any suspended penalty may become due and owing immediately. Payment of the remaining \$750,000 shall be suspended for a period of three years from the date of this Order, and thereafter shall be waived, provided that during this three-year probationary period under this Order, Streit USA has committed no violation of the Act, or any regulation, order, license or authorization issued thereunder and has made full and timely payment of \$850,000 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 date specified herein, Streit Group FZE and Streit Middle East 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, Streit Group FZE and Streit Middle East shall complete and submit two audits of their export controls compliance programs, as set forth in this paragraph. At least the first of the audits shall be conducted by an unaffiliated third party consultant with expertise in U.S. export control laws. The audits shall assess both companies' compliance with U.S. export control laws (including recordkeeping requirements), with respect to all exports, reexports, and transfers that are subject to the Regulations. The

results of the audits, including any relevant supporting materials, shall be submitted to the Department of Commerce, Bureau of Industry and Security, Office of Export Enforcement, 381 Elden Street, Suite 1125, Herndon, VA 20170 ("BIS Washington Field Office"). The first audit shall cover the 18-month period beginning on the date of this Order, and the second audit shall cover the 18-month period immediately following the first audit period. Reports on the results of the two audits shall be due to the BIS Washington Field Office no later than twenty-one (21) months and thirty-nine (39) months, respectively, from the date of this Order. Said audits shall be in substantial compliance with the Export Management and Compliance Program (EMCP) sample audit module. The EMCP sample audit module is available on the BIS web site at [http://www.bis.doc.gov/index.php/forms-documents/doc\\_download/1256-emcp-guidelines-november-2013](http://www.bis.doc.gov/index.php/forms-documents/doc_download/1256-emcp-guidelines-november-2013). In addition, where any of the audits identifies actual or potential violations of the Regulations, Streit Group FZE and Streit Middle East must promptly provide copies of the pertinent air waybills and other export control documents and supporting documentation to the BIS Washington Field Office.

FOURTH, the full and timely payment of the civil penalty in accordance with the payment schedule set forth above and the timely completion and submission of the results of the audits as set forth above are 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 Streit Group FZE and Streit Middle East.

FIFTH, that for a period of three (3) years from the date of entry of this Order, Streit Group FZE, with a last known address of PO Box 10559, Technology Park, Ras Al Khaimah, Free Trade Zone, United Arab Emirates, and Streit Middle East FZCO, with a

last known address of PO Box 262051, Jebel Ali Free Zone, Dubai, United Arab Emirates, and when acting for or on their behalf, their successors, assigns, directors, officers, employees, representatives, or agents (each a "Denied Person" and collectively the "Denied Persons"), may not, directly or indirectly, participate 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.

SIXTH, that no person may, directly or indirectly, do any of the following:

- A. Export or reexport to or on behalf of a Denied Person any item subject to the Regulations;
- B. Take any action that facilitates the acquisition or attempted acquisition by a 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 a 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 a Denied Person of any item subject to the Regulations that has been exported from the United States;
  - D. Obtain from a 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 a Denied Person, or service any item, of whatever origin, that is owned, possessed or controlled by a 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.

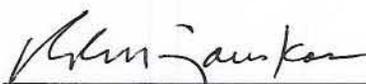
SEVENTH, that, after notice and opportunity for comment as provided in Section 766.23 of the Regulations, any person, firm, corporation, or business organization related to a Denied Person by affiliation, ownership, control, or position of responsibility in the conduct of trade or related services may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

EIGHTH, that, as authorized by Section 766.18(c) of the Regulations, the three-year denial period set forth above shall be suspended during a probationary period of three years under this Order, and shall thereafter be waived, provided that Streit Group FZE and Streit Middle East have made full and timely payment as set forth above, have fully and timely completed and submitted results of the audits as set forth above, and have committed no other violation of the Act or any regulation, order, license or authorization issued thereunder during the three-year denial period. If Streit Group FZE and Streit Middle East do not make full and timely payment in as set forth above, do not fully and timely complete and submit results of the audits as set forth above, or commit another violation of the Act or the Regulations or any order, license or authorization issued thereunder, during the three-year probationary period under this Order, the suspension may be modified or revoked by BIS and a denial order, including a three year denial period, activated against Streit Group FZE and Streit Middle East.

NINTH, Streit Group FZE and Streit Middle East shall not take any action or make or permit to be made any public statement, directly or indirectly, denying the allegations in the Proposed Charging Letter or this Order. The foregoing does not affect Streit Group FZE and Streit Middle East's testimonial obligations in any proceeding, nor does it affect their right to take legal or factual positions in civil litigation or other civil proceedings in which the U.S. Department of Commerce is not a party.

TENTH, 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.

  
for David W. Mills  
Assistant Secretary of Commerce  
for Export Enforcement

Issued this 1<sup>ST</sup> day of September, 2015.

UNITED STATES DEPARTMENT OF COMMERCE  
BUREAU OF INDUSTRY AND SECURITY  
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**Streit Middle East FZCO**  
PO Box 262051  
Jebel Ali Free Zone  
Dubai, United Arab Emirates

Respondents

**SETTLEMENT AGREEMENT**

This Settlement Agreement (“Agreement”) is made by and between Streit Group FZE, of Ras Al Khaimah, United Arab Emirates (“Streit Group FZE”), and Streit Middle East FZCO, of Dubai, United Arab Emirates (“Streit Middle East”) 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>

<sup>1</sup> The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2015). The charged violations occurred in 2009. The Regulations governing the violations at issue are found in the 2009 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2009)). The 2015 version of the Regulations govern the procedural aspects of this case.

<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)), which has been extended by successive Presidential Notices, the most recent being that of August 7, 2014 (79 Fed. Reg. 46,959 (Aug. 11, 2014)), has

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WHEREAS, BIS has notified Streit Group FZE and Streit Middle East of its intention to initiate an administrative proceeding against them, pursuant to the Act and the Regulations;

WHEREAS, BIS has issued a Proposed Charging Letter to Streit Group FZE and Streit Middle East that alleged that Streit Group FZE and Streit Middle East committed the following violations of the Regulations:

As both to Streit Group FZE and Streit Middle East:

**Charges 1 – 4:                    15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation.**

Between in or about August 2009, and in or about September 2009, Streit Group FZE and Streit Middle East engaged in a series of transactions in which they sold and/or transferred U.S.-origin vehicles retrofitted with ballistic steel and bullet proof glass with knowledge that a violation of the Regulations had occurred, was occurring, or was about to occur in connection with the items. The armored vehicles were subject to the Regulations and had been exported from the United States, were classified under Export Control Classification Number 9A018, and were valued in total at approximately \$1,127,050.

The items had been exported to Streit Middle East in the UAE by Streit USA Armoring, LLC (“Streit USA”), pursuant to a BIS license dated December 7, 2007, under which Streit Middle East was designated as the authorized intermediate and ultimate consignee. The license as issued covered a certain maximum number of armored vehicles effective through December 31, 2009, and included a license condition providing that no resale, transfer, or reexport of the items was permitted without prior U.S. Government authorization. Streit Middle East and Streit USA both have at all times pertinent hereto been subsidiaries of Streit Group FZE; and all three of these Streit Group entities had all times pertinent hereto the same chairman and chief executive officer (“CEO”), Guerman Goutorov, who also was the sole or majority owner of each of them.

Streit Middle East and Streit Group FZE learned of this license condition no later than in or about July 2009. On July 23, 2009, Streit USA’s export licensing coordinator sent to Chairman/CEO Goutorov and several Streit Group employees a “Streit USA Armoring End User Request Form,” which read in pertinent part:

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continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, et seq.) (2006 & Supp. IV 2010).

6.6.

Please provide the following information to Streit USA Armoring for submission to the DOC [Department of Commerce], and wait for approval prior to any sale, transfer, or reexport of US produced armored SUVs. Only after approval has been given, in writing, to Streit USA Armoring from the DOC for an approved sale, may the sale proceed.

Shortly thereafter, on July 27, 2009, Streit USA's export licensing coordinator further stated via email to Chairman/CEO Goutorov and several Streit Group employees, including Streit Group FZE's director of sales and marketing, that:

[T]here are no exceptions to getting approval for the resale of the vehicles. Even a direct sale to the US military would still require an approval from the US Department of Commerce and Department of Defense. Please continue to search out where the previously sold vehicles are, as this becomes more important every day. It is highly likely that we will be fined for each truck, which has been shipped, that we do not have proper approval for. These fines can be as much as twice the value of each truck . . . .

Despite knowing of the prohibitions contained in the license condition and that violations of them were subject to potential monetary penalties, Streit Middle East sold or transferred the items without the required authorization on four occasions to Streit Group FZE for resale and/or reexport, which, in turn, sold and/or reexported the items without the required U.S. Government authorization.

The first of these unauthorized transactions occurred in connection with a reexport to Iraq that occurred on or about August 18, 2009. Streit Group FZE informed Streit USA on August 10, 2009, that it had resold and would be reexporting eight armored vehicles to Iraq. On August 19, 2009, Streit USA's export licensing coordinator reiterated, via email, to Chairman/CEO Goutorov and Streit Group FZE's director of sales and marketing, as well as to Eric Carlson, Streit USA's vice president, operations, that "our license . . . agreement states, the resale/re-export of these vehicles must be approved by the [D]epartment of Commerce in the USA . . . . I have gone ahead and applied for your re-export license, but it has not been returned as of 8/19/09, with approval. These vehicles should remain in Dubai until the proper authorization has been received from the US government." Streit Group FZE's director of sales and marketing replied to Carlson and Goutorov, "Eric, Guerman - if we follow the rules . . . we have to stop [armored Chevrolet S]uburban sales."

The Streit Group companies did not stop their sales or other activities in knowing violation of the license condition and the Regulations. Streit Group FZE engaged in the August 18, 2009 reexport to Iraq of armored vehicles valued at \$687,050, notwithstanding the warnings conveyed on July 23 and 27, 2009. Shortly thereafter, on September 6, 2009, Streit Group FZE reexported an armored vehicle valued at \$90,000 to the Philippines, notwithstanding the additional warning it received on August 19, 2009.

6.6.

Moreover, on or about September 3 and September 13, 2009, respectively, Streit Group FZE signed contracts for the sale of a total of four armored vehicles for reexport to Singapore. The items were valued in total at \$350,000.

Streit Middle East and Streit Group FZE knew of the license condition that applied to the items and their actions described above, but did not obtain the required prior U.S. Government authorization for any of them, whether involving the transfer or sale of the items from Streit Middle East to Streit Group FZE, or the sale, transfer or reexport of the items by Streit Middle East or Streit Group FZE to third parties.

In so doing, Streit Group FZE and Streit Middle East committed four violations of Section 764.2(e) of the Regulations and are joint and severally liable for those violations.

As to Streit Middle East:

**Charges 5 – 6: 15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation.**

On two occasions between on or about August 23, 2009, and on or about November 8, 2009, Streit Middle East engaged in a series of transactions in which it sold and/or transferred U.S.-origin vehicles retrofitted with ballistic steel and bullet proof glass with knowledge that a violation of the Regulations had occurred, was occurring, or was about to occur in connection with the items. The armored vehicles were subject to the Regulations and had been exported from the United States, were classified under Export Control Classification Number 9A018, and were valued in total at approximately \$679,200.

Streit Middle East knew that prior U.S. Government authorization was required for the resale and reexport of the items from the warnings conveyed to it by Streit USA on July 23, July 27, and August 19, 2009, and described in Charges 1–4 above, which are realleged and incorporated in pertinent part herein. Notwithstanding those warnings, which included a warning that any violations were subject to monetary penalties, Streit Middle East reexported two armored vehicles valued in total at \$168,000 to Nigeria without the required authorization on or about August 23, 2009, and reexported five armored vehicles to the Philippines valued in total at \$426,000 on or about November 8, 2009.

In so doing, Streit Middle East committed two violations of Section 764.2(e) of the Regulations.

As to Streit Group FZE:

**Charge 7: 15 C.F.R. § 764.2(b) – Causing, Aiding, and Abetting a False Statement in connection with a License Application**

6.6.

In or about January - February 2009, Streit Group FZE caused, aided, abetted, commanded, induced, procured, and/or permitted a false or misleading statement to BIS in connection with the submission of a license application, an "export control document" as defined in Section 772.1 of the Regulations. Streit Group FZE's U.S. subsidiary, Streit USA, had filed an application with BIS on November 20, 2008, to export 25 armored vehicles from the United States to Venezuela. On January 16, 2009, as part of the interagency license application review process, BIS forwarded certain questions about the application to Streit USA, which Streit USA forwarded to its parent company, Streit Group FZE. Streit Group FZE's international sales manager responded later the same day, stating, "Regarding the request for additional information . . . I think we should advise the Dept[.] of Commerce that the client's deadline for importing the vehicles has expired as they needed them by December 31<sup>st</sup>. We don't want to bring any unnecessary attention and they may ask for more information or even . . . contact the client." On or about January 20, 2009, Streit USA's vice president, operations, Eric Carlson, responded by email to Streit Group FZE's international sales manager, as well as its chairman and chief executive officer Guerman Goutorov, stating, "We can advise the Commerce Department that the customer went elsewhere to purchase their armored vehicles due to the fact that it took too long for us to get an export license." Consistent with this scheme, Streit USA falsely stated to BIS on or about February 2, 2009, that the sale had been lost and that the license application should be returned without action. This false statement violated Section 764.2(g) of the Regulations, which prohibits, inter alia, the making of any false or misleading statement or representation to BIS in connection with a license application submitted to BIS. In fact, the sale had not been lost, and Streit USA had already shipped some of the items identified in the license application to Canada on or about December 10, 2008, less than three weeks after the license had been filed, knowing that after their arrival in Canada the items would be transshipped to Venezuela.

In so doing, Streit Group FZE committed one violation of Section 764.2(b) of the Regulations.

WHEREAS, Streit Group FZE and Streit Middle East have reviewed the Proposed Charging Letter and are aware of the allegations made against them and the administrative sanctions which could be imposed against them if the allegations are found to be true;

WHEREAS, Streit Group FZE and Streit Middle East fully understand 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, Streit Group FZE and Streit Middle East enter into this Agreement voluntarily and with full knowledge of their rights, after having consulted with counsel;

WHEREAS, Streit Group FZE and Streit Middle East state that no promises or representations have been made to them other than the agreements and considerations herein expressed;

WHEREAS, Streit Group FZE and Streit Middle East neither admit nor deny the allegations contained in the Proposed Charging Letter;

WHEREAS, Streit Group FZE and Streit Middle East wish to settle and dispose of all matters alleged in the Proposed Charging Letter by entering into this Agreement; and

WHEREAS, Streit Group FZE and Streit Middle East agree 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 Streit Group FZE and Streit Middle East, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.

2. The following sanction shall be imposed against Streit Group FZE and Streit Middle East in complete settlement of the alleged violation of the Regulations relating to the transaction specifically detailed in the Proposed Charging Letter:

a. Streit Group FZE and Streit Middle East shall jointly and severally be assessed a civil penalty in the amount of \$1,600,000. Streit Group FZE and Streit Middle East shall pay the U.S. Department of Commerce \$850,000 of this amount in installments as follows: \$284,000 within 30 days of the date of the

Order; \$283,000 not later than one year from the date of the Order; and \$283,000 not later than two years from the date of the Order. Payment shall be made in the manner specified in the attached instructions. If any of the three (3) installment payments is not fully and timely made, any remaining scheduled installment payments and any suspended penalty may become due and owing immediately. Payment of the remaining \$750,000 shall be suspended until three years from the date of the Order, and thereafter shall be waived, provided that during this three-year probationary period under the Order, Streit Group FZE and Streit Middle East have committed no violation of the Act, or any regulation, order, license or authorization issued thereunder, and provided that Streit Group FZE and Streit Middle East have made full and timely payment of \$850,000 as set forth above.

b. Streit Group FZE and Streit Middle East shall complete and submit two audits of their export controls compliance programs. At least the first of the audits shall be conducted by an unaffiliated third party consultant with expertise in U.S. export control laws. The audits shall assess both companies' compliance with U.S. export control laws (including recordkeeping requirements and the requirements of this settlement agreement), with respect to all exports, reexports, and transfers that are subject to the Regulations. The results of the audits, including any relevant supporting materials, shall be submitted to the Department of Commerce, Bureau of Industry and Security, Office of Export Enforcement, 381 Elden Street, Suite 1125, Herndon, VA 20170 ("BIS Washington Field Office"). The first of the audits shall cover the 18-month period beginning on the date of the Order, and the second shall cover the 18-

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6.6.

month period immediately following the first audit period. Reports on the results of the audits shall be due to the BIS Washington Field Office no later than twenty-one (21) months and thirty-nine (39) months, respectively, from the date of the Order. Said audits shall be in substantial compliance with the Export Management and Compliance Program (EMCP) sample audit module. The EMCP sample audit module is available on the BIS web site at [http://www.bis.doc.gov/index.php/forms-documents/doc\\_download/1256-emcp-guidelines-november-2013](http://www.bis.doc.gov/index.php/forms-documents/doc_download/1256-emcp-guidelines-november-2013). In addition, where any of the audits identifies actual or potential violations of the Regulations, Streit Group FZE and Streit Middle East must promptly provide copies of the pertinent air waybills and other export control documents and supporting documentation to the BIS Washington Field Office.

c. The full and timely payment of the civil penalty agreed to in Paragraph 2. a, and the timely completion and submission of the results of the audits in Paragraph 2.b are 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 Streit Group FZE and Streit Middle East.

d. For a period of three (3) years from the date of the Order, Streit Group FZE, with a last known address of PO Box 10559, Technology Park, Ras Al Khaimah, Free Trade Zone, United Arab Emirates, and Streit Middle East FZCO, with a last known address of PO Box 262051, Jebel Ali Free Zone, Dubai, United Arab Emirates, and when acting for or on their behalf, their successors, assigns, directors, officers, employees, representatives, or agents (each a "Denied Person" and collectively the "Denied Persons"), may not, directly or indirectly,

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6.6.

participate 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.

e. BIS agrees that, as authorized by Section 766.18(c) of the Regulations, the three-year denial period set forth in Paragraph 2.d shall be suspended, provided that Streit Group FZE and Streit Middle East have made full and timely payment of the civil penalty in accordance with Paragraph 2.a above, have fully and timely completed and submitted the results of the audits in accordance with Paragraph 2.b, and have committed no other violation of the Act or any regulation, order, license or authorization issued thereunder during the three-year denial period. If Streit Group FZE and Streit Middle East do not make

6.6.

full and timely payment in accordance with Paragraph 2.a above, do not fully and timely complete and submit the results of the audits in accordance with Paragraph 2.b, or commit another violation of the Act or the Regulations or any order, license or authorization issued thereunder during the three-year probationary period under the Order, the suspension may be modified or revoked by BIS and a denial order, including a three-year denial period, activated against Streit Group FZE and Streit Middle East.

3. Subject to the approval of this Agreement pursuant to paragraph 8 hereof, Streit Group FZE and Streit Middle East hereby waive 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. Streit Group FZE and Streit Middle East also waive 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 the later of the date Streit Group FZE and Streit Middle East pay in full the civil penalty agreed to in Paragraph 2.a of this Agreement or have completed and submitted the results of the audits agreed to in Paragraph 2.b.

6.6.

4. Streit Group FZE and Streit Middle East shall not take any action or make or permit to be made any public statement, directly or indirectly, denying the allegations in the Proposed Charging Letter or the Order. The foregoing does not affect Streit Group FZE and Streit Middle East's testimonial obligations in any proceeding, nor does it affect their right to take legal or factual positions in civil litigation or other civil proceedings in which the U.S. Department of Commerce is not a party.

5. BIS agrees that upon full and timely payment of the civil penalty as set forth in Paragraph 2.a above, and full and timely completion and submission of the results of both of the audits as set forth in Paragraph 2.b above, BIS will not initiate any further administrative proceeding against Streit Group FZE and Streit Middle East 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.

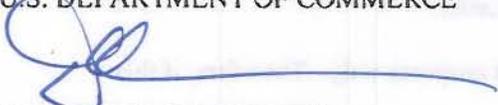
6.6.

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.

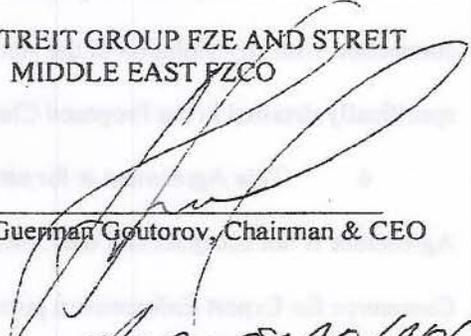
10. Each signatory affirms that he has authority to enter into this Settlement Agreement and to bind his respective party to the terms and conditions set forth herein.

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

  
\_\_\_\_\_  
Douglas R. Hassebrock  
Director, Office of Export Enforcement

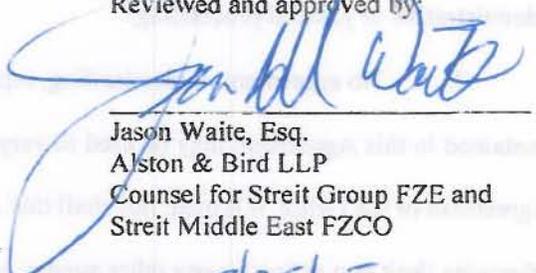
Date: 31 Aug 15

STREIT GROUP FZE AND STREIT  
MIDDLE EAST FZCO

  
\_\_\_\_\_  
Guernan Goutorov, Chairman & CEO

Date: Aug 15 20/2015

Reviewed and approved by:

  
\_\_\_\_\_  
Jason Waite, Esq.  
Alston & Bird LLP  
Counsel for Streit Group FZE and  
Streit Middle East FZCO

Date: 8/25/15

Streit Group FZE  
Proposed Charging Letter  
Page 2 of 7

**PROPOSED CHARGING LETTER**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Streit Group FZE  
PO Box 10559, Technology Park  
Ras Al Khaimah, Free Trade Zone  
United Arab Emirates

*Attention: Guerman Goutorov  
Chairman & Chief Executive Officer*

Streit Middle East FZCO  
PO Box 262051  
Jebel Ali Free Zone  
Dubai, United Arab Emirates

*Attention: Guerman Goutorov  
Chairman & Chief Executive Officer*

Dear Mr. Goutorov:

The Bureau of Industry and Security, United States Department of Commerce ("BIS"), has reason to believe that Streit Group FZE, of Ras Al Khaimah, United Arab Emirates, and Streit Middle East FZCO of Dubai, United Arab Emirates ("Streit Middle East"), have violated the Export Administration Regulations (the "Regulations"),<sup>1</sup> which issued under the authority of the Export Administration Act of 1979, as amended (the "Act").<sup>2</sup> Specifically, BIS charges that Streit Group FZE and Streit Middle East committed the following violations:

*As both to Streit Group FZE and Streit Middle East:*

**Charges 1 – 4: 15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation.**

As set forth in greater detail in the Schedule of Violations attached hereto and incorporated herein, between in or about August 2009, and in or about September 2009, Streit Group FZE and Streit Middle East engaged in a series of transactions in which they sold and/or transferred U.S.-

<sup>1</sup> The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2015). The charged violations occurred in 2009. The Regulations governing the violations at issue are found in the 2009 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2009)). The 2015 version of the 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 7, 2014 (79 Fed. Reg. 46,959 (Aug. 11, 2014)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*) ("IEEPA").

origin vehicles retrofitted with ballistic steel and bullet proof glass with knowledge that a violation of the Regulations had occurred, was occurring, or was about to occur in connection with the items. The armored vehicles were subject to the Regulations and had been exported from the United States, classified under Export Control Classification Number ("ECCN") 9A018, controlled on national security grounds, and valued in total at approximately \$1,127,050.

The items had been exported to Streit Middle East in the UAE by Streit USA Armoring, LLC ("Streit USA"), pursuant to a BIS license dated December 7, 2007, under which Streit Middle East was designated as the authorized intermediate and ultimate consignee. The license as issued covered a certain maximum number of armored vehicles effective through December 31, 2009, and included a license condition providing that no resale, transfer, or reexport of the items was permitted without prior U.S. Government authorization. Streit Middle East and Streit USA both have at all times pertinent hereto been subsidiaries of Streit Group FZE; and all three of these Streit Group entities had all times pertinent hereto the same chairman and chief executive officer ("CEO"), Guerman Goutorov, who also was the sole or majority owner of each of them.

Streit Middle East and Streit Group FZE learned of this license condition no later than in or about July 2009. On July 23, 2009, Streit USA's export licensing coordinator sent to Chairman/CEO Goutorov and several Streit Group employees a "Streit USA Armoring End User Request Form," which read in pertinent part:

Please provide the following information to Streit USA Armoring for submission to the DOC [Department of Commerce], and wait for approval prior to any sale, transfer, or reexport of US produced armored SUVs. Only after approval has been given, in writing, to Streit USA Armoring from the DOC for an approved sale, may the sale proceed.

Shortly thereafter, on July 27, 2009, Streit USA's export licensing coordinator further stated via email to Chairman/CEO Goutorov and several Streit Group employees, including Streit Group FZE's director of sales and marketing, that:

[T]here are no exceptions to getting approval for the resale of the vehicles. Even a direct sale to the US military would still require an approval from the US Department of Commerce and Department of Defense. Please continue to search out where the previously sold vehicles are, as this becomes more important every day. It is highly likely that we will be fined for each truck, which has been shipped, that we do not have proper approval for. These fines can be as much as twice the value of each truck . . . .

Despite knowing of the prohibitions contained in the license condition and that violations of them were subject to potential monetary penalties, Streit Middle East sold or transferred the items without the required authorization on four occasions to Streit Group FZE for resale and/or reexport, which, in turn, sold and/or reexported the items without the required U.S. Government authorization.

The first of these unauthorized transactions occurred in connection with a reexport to Iraq that occurred on or about August 18, 2009. Streit Group FZE informed Streit USA on August 10, 2009, that it had resold and would be reexporting eight armored vehicles to Iraq. On August 19, 2009, Streit USA's export licensing coordinator reiterated, via email, to Chairman/CEO Goutorov and Streit Group FZE's director of sales and marketing, as well as to Eric Carlson, Streit USA's vice president, operations, that "our license . . . agreement states, the resale/re-export of these vehicles must be approved by the [D]epartment of Commerce in the USA . . . . I have gone ahead and applied for your re-export license, but it has not been returned as of 8/19/09, with approval. These vehicles should remain in Dubai until the proper authorization has been received from the US government." Streit Group FZE's director of sales and marketing replied to Carlson and Goutorov, "Eric, Guerman – if we follow the rules . . . we have to stop [armored Chevrolet S]uburban sales."

The Streit Group companies did not stop their sales or other activities in knowing violation of the license condition and the Regulations. Streit Group FZE engaged in the August 18, 2009 reexport to Iraq of armored vehicles valued at \$687,050, notwithstanding the warnings conveyed on July 23 and 27, 2009. Shortly thereafter, on September 6, 2009, Streit Group FZE reexported an armored vehicle valued at \$90,000 to the Philippines, notwithstanding the additional warning it received on August 19, 2009. Moreover, on or about September 3 and September 13, 2009, respectively, Streit Group FZE signed contracts for the sale of a total of four armored vehicles for reexport to Singapore. The items were valued in total at \$350,000.

Streit Middle East and Streit Group FZE knew of the license condition that applied to the items and their actions described above, but did not obtain the required prior U.S. Government authorization for any of them, whether involving the transfer or sale of the items from Streit Middle East to Streit Group FZE, or the sale, transfer or reexport of the items by Streit Middle East or Streit Group FZE to third parties.

In so doing, Streit Group FZE and Streit Middle East committed four violations of Section 764.2(e) of the Regulations and are joint and severally liable for those violations.

*As to Streit Middle East:*

**Charges 5 – 6:                    15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation.**

As set forth in greater detail in the Schedule of Violations attached hereto and incorporated herein, on two occasions between on or about August 23, 2009, and on or about November 8, 2009, Streit Middle East engaged in a series of transactions in which it sold and/or transferred U.S.-origin vehicles retrofitted with ballistic steel and bullet proof glass with knowledge that a violation of the Regulations had occurred, was occurring, or was about to occur in connection with the items. The armored vehicles were subject to the Regulations and had been exported from the United States, were classified under ECCN 9A018, controlled on national security

grounds, and valued in total at approximately \$679,200.

Streit Middle East knew that prior U.S. Government authorization was required for the resale and reexport of the items from the warnings conveyed to it by Streit USA on July 23, July 27, and August 19, 2009, and described in Charges 1–4 above, which are realleged and incorporated in pertinent part herein. Notwithstanding those warnings, which included a warning that any violations were subject to monetary penalties, Streit Middle East reexported two armored vehicles valued in total at \$168,000 to Nigeria without the required authorization on or about August 23, 2009, and reexported five armored vehicles to the Philippines valued in total at \$426,000 on or about November 8, 2009.

In so doing, Streit Middle East committed two violations of Section 764.2(e) of the Regulations.

As to Streit Group FZE:

**Charge 7: 15 C.F.R. § 764.2(b) – Causing, Aiding, and Abetting a False Statement in connection with a License Application**

In or about January - February 2009, Streit Group FZE caused, aided, abetted, commanded, induced, procured, and/or permitted a false or misleading statement to BIS in connection with the submission of a license application, an “export control document” as defined in Section 772.1 of the Regulations. Streit Group FZE’s U.S. subsidiary, Streit USA, had filed an application with BIS on November 20, 2008, to export 25 armored vehicles from the United States to Venezuela. On January 16, 2009, as part of the interagency license application review process, BIS forwarded certain questions about the application to Streit USA, which Streit USA forwarded to its parent company, Streit Group FZE. Streit Group FZE’s international sales manager responded later the same day, stating, “Regarding the request for additional information . . . I think we should advise the Dept[.] of Commerce that the client[']s deadline for importing the vehicles has expired as they needed them by December 31<sup>st</sup>. We don’t want to bring any unnecessary attention and they may ask for more information or even . . . contact the client.” On or about January 20, 2009, Streit USA’s vice president, operations, Eric Carlson, responded by email to Streit Group FZE’s international sales manager, as well as its chairman and chief executive officer Guerman Goutorov, stating, “We can advise the Commerce Department that the customer went elsewhere to purchase their armored vehicles due to the fact that it took too long for us to get an export license.” Consistent with this scheme, Streit USA falsely stated to BIS on or about February 2, 2009, that the sale had been lost and that the license application should be returned without action. This false statement violated Section 764.2(g) of the Regulations, which prohibits, inter alia, the making of any false or misleading statement or representation to BIS in connection with a license application submitted to BIS. In fact, the sale had not been lost, and Streit USA had already shipped some of the items identified in the license application to Canada on or about December 10, 2008, less than three weeks after the license had been filed, knowing that after their arrival in Canada the items would be transshipped to Venezuela.

In so doing, Streit Group FZE committed one violation of Section 764.2(b) of the Regulations.

\* \* \* \* \*

Accordingly, Streit Group FZE and Streit Middle East are hereby notified that administrative proceedings are instituted against them 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 violation;<sup>3</sup>
- Denial of export privileges;
- Exclusion from practice before BIS; and/or
- Any other liability, sanction, or penalty available under law.

If Streit Group FZE or Streit Middle East fail 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 (2014). If Streit Group FZE or Streit Middle East defaults, the Administrative Law Judge may find the charge alleged in this letter to be true without a hearing or further notice to the companies. The Under Secretary for Industry and Security may then impose up to the maximum penalty on the charge in this letter.

Streit Group FZE and Streit Middle East are further notified that they are entitled to an agency hearing on the record if they file a written demand for one with their answer. *See* 15 C.F.R. § 766.6 (2014). Streit Group FZE and Streit Middle East are also entitled to be represented by counsel or other authorized representative who has power of attorney to represent the companies. *See* 15 C.F.R. §§ 766.3(a) and 766.4 (2014).

Streit Group FZE and Streit Middle East are further notified that under the Small Business Regulatory Enforcement Flexibility Act, the company 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 (2014). Should Streit Group FZE or Streit Middle East have a proposal to settle this case, the companies or their representatives 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, answers from Streit Group FZE or Streit Middle

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



Streit Group FZE (SGF) & Streit Middle East (SME) Schedule of Violations Regarding Charges 1-6						
Charge No(s).	ECCN	Items' Value	Ultimate Destination	Resale to Third Party	Reexport	Violation
1	9A018	\$687,050	Iraq	N/A	SGF on 8/18/09	15 C.F.R. § 764.2(e)
2	9A018	\$ 90,000	Philippines	SGF on 8/10/09	SGF on 9/6/09	15 C.F.R. § 764.2(e)
3	9A018	\$180,000	Singapore	SGF on 9/3/09	SGF in or about 9/09	15 C.F.R. § 764.2(e)
4	9A018	\$170,000	Singapore	SGF on 9/13/09	SGF in or about 9/09	15 C.F.R. § 764.2(e)
5	9A018	\$168,000	Nigeria	N/A	SME on 8/23/09	15 C.F.R. § 764.2(e)
6	9A018	\$426,000	Philippines	N/A	SME on 11/8/09	15 C.F.R. § 764.2(e)