

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

In the Matter of:

Princeton University
91 Prospect Avenue
Princeton, NJ 08540

Respondent

ORDER RELATING TO
PRINCETON UNIVERSITY

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Princeton University, of Princeton, New Jersey (“Princeton”), of its intention to initiate an administrative proceeding against Princeton pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),¹ through the issuance of a Proposed Charging Letter to Princeton that alleges that Princeton committed thirty-seven (37) violations of the Regulations.² Specifically, the charges are:

¹ The Regulations originally issued under the Export Administration Act of 1979, as amended, 50 U.S.C. §§ 4601-4623 (Supp. III 2015) (“the EAA”), which lapsed on August 21, 2001. 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, continued the Regulations in full force and effect under the International Emergency Economic Powers Act, 50 U.S.C. § 1701, et seq. (2012) (“IEEPA”). On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801-4852 (“ECRA”). While Section 1766 of ECRA repeals the provisions of the EAA (except for three sections which are inapplicable here), Section 1768 of ECRA provides, in pertinent part, that all rules and regulations that were made or issued under the EAA, including as continued in effect pursuant to IEEPA, and were in effect as of ECRA’s date of enactment (August 13, 2018), shall continue in effect until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA.

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2020). The charged violation occurred in 2013-2018. The Regulations governing the violation at issue are found in the 2013-2018 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774). The 2020 Regulations set forth the procedures that apply to this matter.

Charges 1-37 15 C.F.R. § 764.2(a): Engaging in Prohibited Conduct

1. On 37 occasions between on or about November 11, 2013, and on or about March 5, 2018, Princeton University engaged in conduct prohibited by the Regulations when it exported various strains and recombinants of an animal pathogen, items subject to the Regulations, from the United States to various overseas research institutions, without the BIS licenses required by Section 742.2 of the Regulations. The items were classified under Export Control Classification Number (“ECCN”) 1C351, 1C352 or 1C353, controlled for Chemical and Biological Weapons reasons, and valued in total at approximately \$27,000.
2. Pursuant to Section 742.2(a), a BIS license was required to export the items to all destinations. However, no license was sought or obtained for any of the 37 exports at issue.
3. By exporting the items without the required export licenses, Princeton University committed 37 violations of Section 764.2(a) of the Regulations.

WHEREAS, BIS and Princeton 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, Princeton shall be assessed a civil penalty in the amount of \$54,000, 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 (2012)), 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, Princeton 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, Princeton shall complete one external audit and one internal audit of its export controls compliance program. For the external audit, Princeton shall hire an unaffiliated third-party consultant with expertise in U.S. export control laws to conduct an audit of its compliance with U.S. export control laws (including recordkeeping requirements), with respect to all exports or reexports that are subject to the Regulations. The results of the external audit, including any relevant supporting materials, shall be submitted to the Department of Commerce, Bureau of Industry and Security, Office of Export Enforcement, 1200 South Avenue, Staten Island, NY 10314 (“BIS New York Field Office”). The audit shall cover a period of no less than twelve (12) consecutive months in 2019 and/or 2020, and the related report shall be due to the BIS New York Field Office no later than six (6) months from the date of this Order. For the internal audit, Princeton shall conduct an internal review of its export control function for an audit period of no less than twelve (12) consecutive months starting on or after January 1, 2021, and send the results of the audit to the BIS New York Field Office no later than six (6) months from end date of the audit period. Said external and internal audits shall be in substantial compliance with the Export Compliance Program (ECP) sample audit module, and each audit shall include a comprehensive assessment of Princeton’s compliance with the Regulations. The ECP sample audit module is available on the BIS web site at <https://www.bis.doc.gov/index.php/documents/pdfs/1641-ecp/file>. In addition, where said audits identify actual or potential violations of the Regulations, Princeton must promptly provide a detailed plan of corrective actions to be taken, and copies of the pertinent air waybills and other export control documents and supporting documentation related to the identified compliance concerns, to the BIS New York Field Office.

FOURTH, Princeton shall complete two reports describing enhancements to its compliance with the Regulations. Both reports shall be submitted to the BIS New York Field Office. The first report shall be due no later than twelve (12) months from the date of the Order, and the second report shall be due no later than twenty-four (24) months from the date of the Order.

FIFTH, that the full and timely payment of the civil penalty, and the completion of the audits and submission of the audit results, and the submission of reports describing Princeton's compliance enhancements, as set forth above, are 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 Princeton. Accordingly, if Princeton should fail to pay the civil penalty in a full and timely manner, fail to complete and submit the audit results, or fail to submit the reports on compliance enhancements, the undersigned may issue an order denying all of Princeton's export privileges under the Regulations for a period of one year from the date of failure to make such payment, complete and submit such audit results, or submit such reports.

SIXTH, Princeton shall not dispute or deny, directly or indirectly, the allegations contained in the Proposed Charging Letter or this Order or take any position contrary thereto in any public statement. The foregoing does not affect Princeton's testimonial obligations in any administrative or judicial proceeding, nor does it affect its 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.

SEVENTH, 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.

**KEVIN
KURLAND** Digitally signed by
KEVIN KURLAND
Date: 2021.02.01
12:25:00 -05'00'

Kevin J. Kurland
Performing the Non-Exclusive Functions
and Duties of the Assistant Secretary of
Commerce for Export Enforcement

Issued this 1st day of February, 2021.

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

In the Matter of:

Princeton University
91 Prospect Avenue
Princeton, NJ 08540

Respondent

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Princeton University, of Princeton, New Jersey, (“Princeton”), 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

WHEREAS, Princeton 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;

¹ The Regulations originally issued under the Export Administration Act of 1979, as amended, 50 U.S.C. §§ 4601-4623 (Supp. III 2015) (“the EAA”), which lapsed on August 21, 2001. 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, including the Notice of August 8, 2018 (83 Fed. Reg. 39,871 (Aug. 13, 2018)), continued the Regulations in full force and effect under the International Emergency Economic Powers Act, 50 U.S.C. § 1701, et seq. (2012) (“IEEPA”). On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, codified, as amended, at 50 U.S.C. §§ 4801-4852 (“ECRA”). While Section 1766 of ECRA repeals the provisions of the EAA (except for three sections which are inapplicable here), Section 1768 of ECRA provides, in pertinent part, that all rules and regulations that were made or issued under the EAA, including as continued in effect pursuant to IEEPA, and were in effect as of ECRA’s date of enactment (August 13, 2018), shall continue in effect until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA.

WHEREAS, BIS has notified Princeton of its intentions to initiate an administrative proceeding against Princeton, pursuant to the Regulations;²

WHEREAS, BIS has issued a Proposed Charging Letter to Princeton that alleges that Princeton committed thirty-seven (37) violations of the Regulations, specifically:

Charges 1-37 15 C.F.R. § 764.2(a): Engaging in Prohibited Conduct

1. On 37 occasions between on or about November 11, 2013, and on or about March 5, 2018, Princeton University engaged in conduct prohibited by the Regulations when it exported various strains and recombinants of an animal pathogen, items subject to the Regulations, from the United States to various overseas research institutions, without the BIS licenses required by Section 742.2 of the Regulations. The items were classified under Export Control Classification Number (“ECCN”) 1C351, 1C352 or 1C353, controlled for Chemical and Biological Weapons reasons, and valued in total at approximately \$27,000.
2. Pursuant to Section 742.2(a), a BIS license was required to export the items to all destinations. However, no license was sought or obtained for any of the 37 exports at issue.
3. By exporting the items without the required export licenses, Princeton University committed 37 violations of Section 764.2(a) of the Regulations.

WHEREAS, Princeton 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, Princeton fully understands the terms of this Agreement and the Order (“Order”) that the Assistant Secretary of Commerce for Export Enforcement, or appropriate designee, will issue if he approves this Agreement as the final resolution of this matter;

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2020). The charged violations occurred in 2013-2018. The Regulations governing the violation at issue are found in the 2013-2018 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774). The 2020 Regulations set forth the procedures that apply to this matter.

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

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

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

WHEREAS, Princeton 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 Princeton, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.
2. The following sanctions shall be imposed against Princeton:
 - a. Princeton shall be assessed a civil penalty in the amount of \$54,000, 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. Princeton shall complete one external audit and one internal audit of its export controls compliance program. For the external audit, Princeton shall hire an unaffiliated third-party consultant with expertise in U.S. export control laws to conduct an audit of its compliance with U.S. export control laws (including recordkeeping requirements), with respect to all exports or reexports that are subject to the Regulations. The results of the external audit, including any relevant supporting materials, shall be submitted to the Department of Commerce,

Bureau of Industry and Security, Office of Export Enforcement, 1200 South Ave, Staten Island, NY 10314 (“BIS New York Field Office”). The audit shall cover a period of no less than twelve (12) consecutive months in 2019 and/or 2020, and the related report shall be due to the BIS New York Field Office no later than six (6) months from the date of the Order. For the internal audit, Princeton shall conduct an internal review of its export control function for an audit period of no less than twelve (12) consecutive months starting on or after January 1, 2021, and send the results of the audit to the BIS New York Field Office no later than six (6) months from the end date of the audit period. Said external and internal audits shall be in substantial compliance with the Export Compliance Program (ECP) sample audit module, and each audit shall include a comprehensive assessment of Princeton’s compliance with the Regulations. The ECP sample audit module is available on the BIS website at <https://www.bis.doc.gov/index.php/documents/pdfs/1641-ecp/file>. In addition, where said audits identify actual or potential violations of the Regulations, Princeton shall promptly provide a detailed plan of corrective actions to be taken, and copies of the pertinent air waybills and other export control documents and supporting documentation related to the identified compliance concerns, to the BIS New York Field Office.

c. Princeton shall complete two reports describing its enhancements to its compliance with the Regulations. Both reports shall be submitted to the BIS New York Field Office. The first report shall be due no later than twelve (12) months from the date of the Order, and the second report shall be due no later than twenty-four (24) months from the date of the Order.

d. The full and timely payment of the civil penalty agreed to in Paragraph 2.a, the completion of the audits and submission of the audit results in Paragraph 2.b, and the submission of reports describing Princeton's compliance enhancements in Paragraph 2.c, 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 Princeton. Failure to make full and timely payment of the civil penalty, failure to complete the audits and submit the audit results, or failure to submit the reports on compliance enhancements, may result in the denial of all of Princeton's export privileges under the Regulations for one year from the date of the failure to make such payment, complete and submit such audit results, or submit such reports.

3. Subject to the approval of this Agreement pursuant to Paragraph 8 hereof, Princeton hereby waives all rights to further procedural steps in this matter (except the procedural steps set forth in Sections 766.17(c) and 766.18(c) of the Regulations with respect to the possible activation of suspended sanctions due to a violation or 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. Princeton 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 the later of the date Princeton pays in full the civil penalty agreed to in Paragraph 2.a of this Agreement, has completed the audits and submitted the audit results in Paragraph 2.b., or has submitted the reports describing Princeton's compliance enhancements in Paragraph 2.c.

4. Princeton shall not dispute or deny, directly or indirectly, the allegations contained in the Proposed Charging Letter or the Order or take any position contrary thereto in any public statement. The foregoing does not affect Princeton's testimonial obligations in any administrative or judicial proceeding, nor does it affect its 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 completion and submission of the audits in Paragraph 2.b, BIS will not initiate any further administrative proceeding against Princeton in connection with any violation of 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, or appropriate designee, 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. This Agreement constitutes and contains the entire agreement and understanding among the parties, and the terms of this Agreement or the Order, if issued,

may not be varied or otherwise altered or affected by any agreement, understanding, representation, or interpretation not contained in this Agreement; 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.

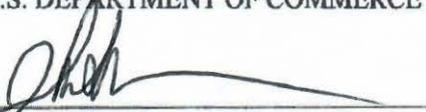
8. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement, or appropriate designee, approves it by issuing the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

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

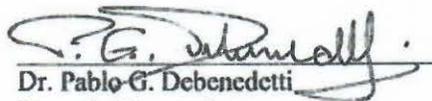
10. Each signatory affirms that he/she has authority to enter into this Settlement Agreement and to bind his/her respective party to the terms and conditions set forth herein.

11. If any provision of this Settlement Agreement is found to be unlawful, only the specific provision in question shall be affected and the other provisions shall remain in full force and effect.

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


John Sonderman
Director of Export Enforcement

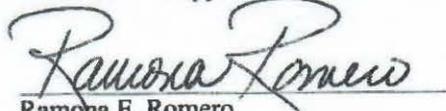
PRINCETON UNIVERSITY


Dr. Pablo G. Debenedetti
Dean for Research

Date: 1/29/2021

Date: 1/14/21

Reviewed and approved by:


Ramona E. Romero
Vice President and General Counsel

Date: 1/15/2021

PROPOSED CHARGING LETTER
CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Princeton University
91 Prospect Avenue
Princeton, NJ 08540

Attention: Dr. Pablo G. DeBenedetti
Dean for Research

Dear Dr. DeBenedetti:

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that Princeton University, of Princeton, New Jersey, has committed thirty-seven (37) violations of the Export Administration Regulations (the “Regulations”).¹ Specifically, BIS alleges that Princeton committed the following violation:²

Charges 1-37 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct

1. As described in greater detail in the attached Schedule of Violations, which is incorporated herein by reference, on 37 occasions between on or about November 11, 2013, and on or about March 5, 2018, Princeton University engaged in conduct prohibited by the Regulations when it exported various strains and recombinants of an animal pathogen, items subject to the Regulations, from the United States to various overseas research institutions, without the BIS licenses required by Section 742.2 of the Regulations. The items were classified under Export

¹ The Regulations originally issued under the Export Administration Act of 1979, 50 U.S.C. §§ 4601-4623 (Supp. III 2015) (“EAA”), which lapsed on August 21, 2001. The President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which was extended by successive Presidential Notices, continued the Regulations in full force and effect under the International Emergency Economic Powers Act (50 U.S.C. 1701, *et seq.* (2012)) (“IEEPA”). On August 13, 2018, the President signed into law the Export Control Reform Act of 2018 (50 U.S.C. §§ 4801-4852 (2019)) (“ECRA”). While ECRA repeals the EAA (except for three sections which are inapplicable here), Section 1768 of ECRA provides, in pertinent part, that all rules and regulations that were made or issued under the EAA, including as continued in effect pursuant to IEEPA, or under the Regulations and were in effect as of ECRA’s date of enactment (August 13, 2018), shall continue in effect according to their terms until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA.

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2020). The violations alleged occurred between 2013 and 2018. The Regulations governing the violations at issue are found in the 2013-2018 versions of the Code of Federal Regulations, 15 C.F.R. Parts 730-774 (2013-18). The 2020 Regulations currently govern the procedural aspects of this case.

Control Classification Number (“ECCN”) 1C351, 1C352 or 1C353, controlled for Chemical and Biological Weapons reasons, and valued in total at approximately \$27,000.³

2. Pursuant to Section 742.2(a), a BIS license was required to export the items to all destinations. However, no license was sought or obtained for any of the 37 exports at issue.

3. By exporting the items without the required export licenses, Princeton University committed 37 violations of Section 764.2(a) of the Regulations.

* * * * *

Accordingly, Princeton University 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,⁴ including, but not limited to, any or all of the following:

- The maximum civil penalty allowed by law of up to the greater of \$307,922 per violation,⁵ or twice the value of the transaction that is the basis of the violation;⁶
- Denial of export privileges;
- Exclusion from practice before BIS; and/or
- Any other liability, sanction, or penalty available under law.

If Princeton University 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 Princeton University defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Princeton

³ During the time period of the export transactions at issue, the animal pathogen was classified under ECCNs 1C351 and 1C352. Genetic elements of the animal pathogen were at all times relevant hereto classified under ECCN 1C353.

⁴ The alleged violations occurred prior to August 13, 2018, the date of enactment of ECRA. Consequently, the potential sanctions are provided for in IEEPA. For violations that occur on or after August 13, 2018, the potential sanctions are specified in Section 1760(c) of ECRA. *See* note 1, *supra*.

⁵ *See* 15 C.F.R. §§ 6.3(c)(4) and 6.4; note 4, *supra*. This amount is subject to annual increases pursuant to the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, Sec. 701 of Pub. L. No. 114-74, enacted on November 2, 2015. *See* 85 Fed. Reg. 207, 208-09 (Jan. 3, 2020) (adjusting for inflation the maximum civil monetary penalty under IEEPA from \$302,584 to \$307,922, effective January 15, 2020).

⁶ *See* International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

University. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty for the charges in this letter.

Princeton University 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. Princeton University 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 Princeton University have a proposal to settle this case, Princeton University should transmit it to the attorneys 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, Princeton University'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, MD 21202-4022

In addition, a copy of Princeton University's answer must be served on BIS at the following address:

Office of the Chief Counsel for Industry and Security
14th Street and Constitution Avenue, N.W.
Room H-3839
Washington, DC 20230
Attention: Kimberly Hsu, Esq., and Charles Wall, Esq.

Kimberly Hsu and Charles Wall are the attorneys representing BIS in this case; any communications that Princeton University may wish to have concerning this matter should occur through them. Ms. Hsu and Mr. Wall may be contacted by telephone at (202) 482-5301.

Sincerely,

John Sonderman
Director
Office of Export Enforcement

Schedule of Violations

Charge No.	Export Date	Item Description	ECCN	Destination
1	11-Nov-13	Genetic elements of animal pathogen	1C353	Belgium
2	11-Nov-13	Animal pathogen	1C352	United Kingdom
3	17-Dec-13	Genetic elements of animal pathogen	1C353	Belgium
4	17-Dec-13	Genetic elements of animal pathogen	1C353	Singapore
5	4-Feb-14	Animal pathogen	1C352	Belgium
6	10-Feb-14	Animal pathogen	1C352	Canada
7	11-Feb-14	Animal pathogen	1C352	France
8	12-Feb-14	Animal pathogen	1C352	China
9	14-Apr-14	Animal pathogen	1C352	France
10	28-Apr-14	Animal pathogen	1C352	Canada
11	28-Apr-14	Animal pathogen	1C352	Canada
12	29-May-14	Animal pathogen	1C352	Israel
13	30-Jun-14	Animal pathogen	1C352	Japan
14	7-Oct-14	Animal pathogen	1C352	Denmark
15	9-Feb-15	Animal pathogen	1C352	Singapore
16	13-Apr-15	Animal pathogen	1C352	Switzerland
17	8-Jun-15	Animal pathogen	1C352	Canada
18	29-Jun-15	Animal pathogen	1C351	France
19	6-Jul-15	Animal pathogen	1C351	France
20	11-Jan-16	Animal pathogen	1C351	United Kingdom
21	16-May-16	Animal pathogen	1C351	Canada
22	13-Jun-16	Animal pathogen	1C351	Switzerland

23	5-Aug-16	Animal pathogen	1C351	Singapore
24	8-Aug-16	Animal pathogen	1C351	Canada
25	8-Aug-16	Genetic elements of animal pathogen	1C353	Portugal
26	14-Sep-16	Genetic elements of animal pathogen	1C353	Belgium
27	19-Sep-16	Genetic elements of animal pathogen	1C353	Belgium
28	29-Sep-16	Animal pathogen	1C351	Australia
29	25-Oct-16	Animal pathogen	1C351	Canada
30	8-Nov-16	Genetic elements of animal pathogen	1C353	Belgium
31	3-Apr-17	Genetic elements of animal pathogen	1C353	United Kingdom
32	5-Jun-17	Genetic elements of animal pathogen	1C353	Hungary
33	26-Jun-17	Genetic elements of animal pathogen	1C353	Belgium
34	11-Sep-17	Genetic elements of animal pathogen	1C353	Belgium
35	18-Dec-17	Animal pathogen	1C351	South Korea
36	8-Jan-18	Animal pathogen	1C351	India
37	5-Mar-18	Animal pathogen	1C351	United Kingdom