

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

In the Matter of:

Sapphire Havacilik San Ltd. STI
Mustafa Kemal Mah. 2139
Ankara, Türkiye

ORDER RELATING TO
SAPPHIRE HAVACILIK SAN LTD. STI

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Sapphire Havacilik San Ltd. STI of Ankara, Türkiye (“Sapphire”), of its intention to initiate an administrative proceeding against Sapphire pursuant to Section 766.18(a) of the Export Administration Regulations (the “Regulations”),¹ through the issuance of a Proposed Charging Letter to Sapphire that alleges that Sapphire committed two violations of the Regulations.² Specifically:

Charges 1-2 15 CFR. § 764.2(a) – Unlicensed Temporary Reexport of a Gulfstream Aircraft to Russia

1. On two occasions, on or about October 13, 2023 and January 21, 2024, Sapphire engaged in conduct prohibited by and contrary to the Regulations, by temporarily reexporting controlled items, specifically a U.S.-origin Gulfstream aircraft classified under Export Control Classification Number (“ECCN”) 9A991, to Russia without the required BIS license. On both occasions, Sapphire flew the aircraft into Russia on temporary sojourn while it was controlled by or under charter or lease by a Russian national. Pursuant to Section 746.8 of the Regulations, a BIS reexport license was required before the aircraft could be temporarily reexported to Russia.

¹ The Regulations are issued under the authority of the Export Control Reform Act of 2018, Title XVII, Subtitle B of Pub. L. 115-232, 132 Stat. 2208 (“ECRA,” 50 U.S.C. §§ 4801-4852).

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2023). The charged violations occurred in 2023 and 2024. The Regulations governing the violations at issue are found in the 2023 version of the Code of Federal Regulations, 15 C.F.R. Parts 730-774 (2023). The 2023 Regulations set forth the procedures that apply to this matter.

By engaging in the above-described conduct, Sapphire committed two violations of Section 764.2(a) of the Regulations.

WHEREAS, BIS and Sapphire 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;

WHEREAS, Sapphire admits committing the alleged conduct described in the Proposed Charging Letter; and

WHEREAS, I have approved of the terms of such Settlement Agreement;

IT IS THEREFORE ORDERED:

FIRST, Sapphire shall be assessed a civil penalty in the amount of \$285,000. Sapphire shall pay the U.S. Department of Commerce in five installments of: \$45,000 not later than 60 days from the date of the Order; \$60,000 not later than November 29, 2024; \$60,000 not later than February 28, 2025; \$60,000 not later than May 30, 2025; and \$60,000 not later than August 29, 2025. Payment shall be made in the manner specified in the attached instructions.

SECOND, for a period of two (2) years from the date of the Order, Sapphire, with a last known address of Mustafa Kemal Mah. 2139, Ankara, Türkiye, shall be made subject to a two-year denial of its export privileges under the Regulations (“denial”). As authorized by Section 766.18(c) of the Regulations, such denial shall be suspended during this two-year probationary period and shall thereafter be waived, provided that Sapphire has made full and timely payment in accordance with Paragraph 2.a of the Settlement Agreement, has not committed another violation of ECRA, the Regulations, or any order, license or authorization issued under ECRA or the Regulations, and has implemented screening processes to ensure that it does not charter aircraft to nationals of

Russia or Belarus in violation of the Regulations. If Sapphire does not make full and timely payment in accordance with Paragraph 2.a of the Settlement Agreement, commits another violation of ECRA, the Regulations, or any order, license or authorization issued under ECRA or the Regulations during the two-year suspension period under the Order, or does not implement screening processes to ensure that it does not charter aircraft to nationals of Russia or Belarus in violation of the Regulations, the suspension of the denial may be modified or revoked by BIS pursuant to Section 766.17(c) of the Regulations and a denial order (including a two-year denial period) activated against Sapphire. If the suspension of the denial is modified or revoked, the activation order may also revoke any BIS licenses in which Sapphire has an interest at the time of the activation order.

THIRD, should the suspension of the denial be modified or revoked pursuant to Section 766.17(c) of the Regulations, and a denial order (including a two-year denial period) be activated against Sapphire, for the duration of such denial order, Sapphire, and when acting for or on its behalf, its successors, assigns, directors, officers, employees, representatives, or agents (hereinafter collectively referred to as "Denied Person"), 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 engaging 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 from any other activity subject to the Regulations.

FOURTH, should the suspension of the denial be modified or revoked, and a denial order be activated against Sapphire, for the duration of the denial order, no person may, directly or indirectly, do any of the following:

- A. Export or reexport to or on behalf of the Denied Person any item subject to the Regulations;
- B. Take any action that facilitates the acquisition or attempted acquisition by the Denied Person of the ownership, possession, or control of any item subject to the Regulations that has been or will be exported from the United States, including financing or other support activities related to a transaction whereby the Denied Person acquires or attempts to acquire such ownership, possession or control;
- C. Take any action to acquire from or to facilitate the acquisition or attempted acquisition from the Denied Person of any item subject to the Regulations that has been exported from the United States;
- D. Obtain from the Denied Person in the United States any item subject to the Regulations with knowledge or reason to know that the item will be, or is intended to be, exported from the United States; or

- E. Engage in any transaction to service any item subject to the Regulations that has been or will be exported from the United States and which is owned, possessed or controlled by the Denied Person, or service any item, of whatever origin, that is owned, possessed or controlled by the Denied Person if such service involves the use of any item subject to the Regulations that has been or will be exported from the United States. For purposes of this paragraph, servicing means installation, maintenance, repair, modification or testing.

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

SIXTH, 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.



Matthew S. Axelrod
Assistant Secretary of Commerce
for Export Enforcement

Issued this 13th day of June, 2024.

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

In the Matter of:

Sapphire Havacilik San Ltd. STI
Mustafa Kemal Mah. 2139
Ankara, Türkiye

Respondent

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Sapphire Havacilik San Ltd. STI of Ankara, Türkiye (“Sapphire”), 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, BIS has notified Sapphire of its intentions to initiate an administrative proceeding against Sapphire pursuant to the Regulations;²

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

Charges 1-2 15 CFR. § 764.2(a) – Unlicensed Temporary Reexport of a Gulfstream Aircraft to Russia

1. On two occasions, on or about October 13, 2023 and January 21, 2024, Sapphire engaged in conduct prohibited by and contrary to the Regulations, by temporarily reexporting controlled items, specifically a U.S.-origin Gulfstream aircraft classified under Export Control Classification Number (“ECCN”) 9A991, to Russia

¹ The Regulations are issued under the authority of the Export Control Reform Act of 2018, Title XVII, Subtitle B of Pub. L. 115-232, 132 Stat. 2208 (“ECRA,” 50 U.S.C. §§ 4801-4852).

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2023). The charged violations occurred in 2023 and 2024. The Regulations governing the violations at issue are found in the 2023 version of the Code of Federal Regulations, 15 C.F.R. Parts 730-774 (2023). The 2023 Regulations set forth the procedures that apply to this matter.

without the required BIS license. On both occasions, Sapphire flew the aircraft into Russia on temporary sojourn while it was controlled by or under charter or lease by a Russian national. Pursuant to Section 746.8 of the Regulations, a BIS reexport license was required before the aircraft could be temporarily reexported to Russia. By engaging in the above-described conduct, Sapphire committed two violations of Section 764.2(a) of the Regulations.

WHEREAS, Sapphire 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, Sapphire has reviewed, with the assistance of counsel, the terms of this Agreement, 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, and the Proposed Charging Letter, and understands the terms of all three documents;

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

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

WHEREAS, Sapphire cooperated and assisted the Office of Export Enforcement with its investigation relating to this matter;

WHEREAS, Sapphire admits committing the alleged conduct described in the Proposed Charging Letter; and

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

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

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

2. The following sanctions shall be imposed against Sapphire:

a. Sapphire shall be assessed a civil penalty in the amount of \$285,000.

Sapphire shall pay the U.S. Department of Commerce in five installments of: \$45,000 not later than 60 days from the date of the Order; \$60,000 not later than November 29, 2024; \$60,000 not later than February 28, 2025; \$60,000 not later than May 30, 2025; and \$60,000 not later than August 29, 2025. Payment shall be made in the manner specified in the attached instructions.

b. For a period of two (2) years from the date of the Order, Sapphire shall be made subject to a suspended two-year denial of its export privileges under the Regulations (“denial”). As authorized by Section 766.18(c) of the Regulations, such denial shall be suspended during this two-year probationary period and shall thereafter be waived, provided that Sapphire has made full and timely payment in accordance with Paragraph 2.a, has not committed another violation of ECRA, the Regulations, or any order, license or authorization issued under ECRA or the Regulations, and has implemented screening processes to ensure that it does not charter aircraft to nationals of Russia or Belarus in violation of the Regulations. If Sapphire does not make full and timely payment in accordance with Paragraph 2.a above, commits another violation of ECRA, the Regulations, or any order, license or authorization issued under ECRA or the Regulations during the two-year suspension period under the Order, or does not implement screening processes to ensure that it does not charter aircraft to nationals of Russia or Belarus in violation of the Regulations, the suspension of the denial may be

modified or revoked by BIS pursuant to Section 766.17(c) of the Regulations and a denial order (including a two-year denial period) activated against Sapphire. If the suspension of the denial is modified or revoked, the activation order may also revoke any BIS licenses in which Sapphire has an interest at the time of the activation order.³

c. Should the suspension of the denial be modified or revoked pursuant to Section 766.17(c) of the Regulations, and a denial order (including a two-year denial period) be activated against Sapphire, for the duration of such denial order, Sapphire, and when acting for or on its behalf, its successors, assigns, directors, officers, employees, representatives, or agents (hereinafter collectively referred to as “Denied Person”), 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:

- 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

³ Such a revocation would include licenses existing at the time of the activation order.

United States that is subject to the Regulations, or engaging 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 from any other activity subject to the Regulations.

3. Subject to the approval of this Agreement pursuant to Paragraph 7 hereof, Sapphire hereby waives all rights to further procedural steps in this matter including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; and (b) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued. Sapphire 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 enforcement of this Agreement and the Order, if issued.

4. BIS agrees that upon successful compliance in full with the terms of this Agreement and the Order, if issued, BIS will not initiate any further administrative proceeding against Sapphire in connection with any violation of the Regulations committed by Sapphire between October 13, 2023 and February 13, 2024 in conjunction with a temporary reexport of the aircraft, including those violations arising out of the transactions specifically detailed in the Proposed Charging Letter.

5. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement pursuant to Section 766.18(a) of the Regulations, no

Party may use this Agreement in any administrative or judicial proceeding and the Parties shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding.

6. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, if issued; nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the U.S. Government with respect to the facts and circumstances addressed herein.

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

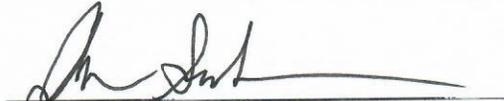
8. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, available to the public.

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

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



John Sonderman
Director of Export Enforcement

SAPPHIRE HAVACILIK SAN LTD. STI

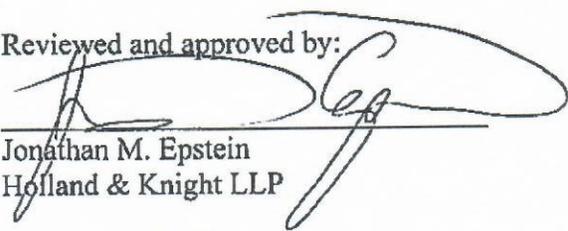


Serkan Serhat Halidi
Manager

Date: June 11, 2024

Date: June 10, 2024

Reviewed and approved by:



Jonathan M. Epstein
Holland & Knight LLP

Christopher D. Grigg
Nixon Peabody LLP
Counsel for Sapphire Havacilik San Ltd. STI

Date: June 11, 2024



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Industry and Security
Office of Export Enforcement
1401 Constitution Avenue, Suite 4508
Washington, DC 20230

PROPOSED CHARGING LETTER

Sapphire Havacilik San Ltd. STI
Mustafa Kemal Mah. 2139
Ankara, Türkiye

Dear Sapphire Havacilik San Ltd. STI,

The Bureau of Industry and Security, U.S. Department of Commerce (BIS), has reason to believe that Sapphire Havacilik San Ltd. STI (“Sapphire”) has committed two violations of the Export Administration Regulations (the “EAR” or “Regulations”).¹ Specifically, BIS alleges the following violations:

Charges 1-2 15 CFR. § 764.2(a) – Unlicensed Temporary Reexport of a Gulfstream Aircraft to Russia

1. On two occasions, on or about October 13, 2023, and January 21, 2024, Sapphire engaged in conduct prohibited by and contrary to the Regulations, by temporarily reexporting controlled items, specifically a U.S.-origin Gulfstream aircraft classified under Export Control Classification Number (“ECCN”) 9A991, to Russia without the required BIS license. On both occasions, Sapphire flew the aircraft into Russia on temporary sojourn while it was controlled by or under charter or lease by a Russian national. Pursuant to Section 746.8 of the Regulations, a BIS reexport license was required before the aircraft could be temporarily reexported to Russia.
2. In so doing, Sapphire committed two violations of Section 764.2(a) of the Regulations, by engaging in any transaction or taking any other action prohibited by or contrary to, or refraining from engaging in any transaction or taking any other action required by ECRA,² the EAR, or any order, license or authorization issued thereunder.

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2023). Those regulations govern the violations at issue and set forth the procedures that apply to this matter.

² 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”).



Background Of Violations

As background³ of the violations identified above and at times material to this charging letter:

The Russia Sanctions Regime

3. The U.S. Commerce Department, through BIS, responded to the Russian Federation's ("Russia's") further invasion of Ukraine by implementing a sweeping series of stringent export controls that severely restrict Russia's access to technologies and other items that it needs to sustain its aggressive military capabilities. These controls primarily target Russia's defense, aerospace, and maritime sectors and are intended to cut off Russia's access to vital technological inputs, atrophy key sectors of its industrial base, and undercut Russia's strategic ambitions to exert influence on the world stage.
4. As part of those controls, effective February 24, 2022, BIS imposed expansive controls on aviation-related (*e.g.*, Commerce Control List Categories 7 and 9)⁴ items to Russia, including a license requirement for the export, reexport or transfer (in-country) to Russia of any aircraft or aircraft parts specified in ECCN 9A991 (Section 746.8(a)(1) of the EAR).⁵ BIS will review any export or reexport license applications for such items under a policy of denial. *See* EAR Section 746.8(b).
5. Effective March 2, 2022, BIS excluded any aircraft registered in, owned or controlled by, or under charter or lease by Russia or a national of Russia from being eligible for export or reexport to Russia pursuant to license exception Aircraft, Vessels, and Spacecraft (AVS) (Section 740.15 of the EAR).⁶ *See* 15 C.F.R. § 746.8(c)(5). As a result, any U.S.-origin aircraft or foreign aircraft that includes more than 25% controlled U.S.-origin content, and that is registered in, owned or controlled by, or under charter or lease by Russia or a national of Russia, is subject to a license requirement before it can be exported or reexported to Russia.

³ This background section does not set forth every fact known or resulting from the investigation; rather, it provides certain additional information to further describe the nature of the above-listed violations.

⁴ The Commerce Control List ("CCL") is found at 15 C.F.R. part 774, Supp. No. 1.

⁵ 87 Fed. Reg. 12226 (Mar. 3, 2022). Effective February 24, 2022, BIS imposed a license requirement for all items controlled under Categories 3-9 of the CCL when destined for Russia, and also imposed these controls on Belarus in a rule effective on Mar. 2, 2022. 87 Fed. Reg. 13048 (Mar. 8, 2022). Additionally, BIS published a final rule effective April 8, 2022, which imposed a license requirement on items controlled on the Commerce Control List ("CCL") under Categories 0-2 that are destined for Russia or Belarus. Accordingly, all CCL items now require export, reexport, and transfer (in-country) licenses if destined for or within Russia or Belarus. 87 Fed. Reg. 22130 (Apr. 14, 2022).

⁶ 87 Fed. Reg. 13048 (Mar. 8, 2022).

**SAPPHIRE's Relationship
to the Aircraft and Flights at Issue**

6. At all times pertinent hereto, the manager of Sapphire, a Turkish citizen, acted as pilot-in-command for all of Sapphire's charter flights.
7. In October 2023, Sapphire acquired one U.S.-origin aircraft that is subject to the EAR and classified under ECCN 9A991: a Gulfstream G-IV aircraft, bearing tail number TC-GLF and manufacturer serial number 1481 (the "Gulfstream").
8. Flight records for the Gulfstream reflect that, after the license requirement under Section 746.8 of the Regulations went into effect on February 24, 2022, and the subsequent removal of eligibility under license exception AVS for the export or reexport of such aircraft to Russia went into effect on March 2, 2022, the Gulfstream was temporarily reexported to Russia on at least two occasions without the requisite BIS authorization. On each occasion, the relevant flight was controlled by, or under charter or lease by a national of Russia.
9. On or about October 13, 2023, the Gulfstream flew from Istanbul, Türkiye to Tyumen, Russia, carrying only two passengers, both of whom were nationals of Russia. The Russian nationals submitted payment to Sapphire through a third-party non-Russian charter broker.
10. Additionally, on or about January 21, 2024, the Gulfstream flew from the Maldives to Moscow, Russia carrying a single passenger. Sapphire was provided with a Cypriot passport belonging to the passenger in advance of the flight, but the passenger was in fact a national of both Russia and Cyprus. The Russian national submitted payment to Sapphire through a third-party non-Russian charter broker.
11. No reexport license was sought or obtained from BIS prior to the temporary reexport of the Gulfstream to Russia on or about October 13, 2023, or January 21, 2024.
12. Despite the use of third-party non-Russian charter brokers, both of the above-referenced flights were controlled by, or under charter or lease by a national of Russia. As set forth above, therefore, on or about October 13, 2023 and January 21, 2024, Sapphire engaged in conduct prohibited by and contrary to the Regulations, by temporarily reexporting a controlled item, specifically a U.S.-origin Gulfstream aircraft, to Russia without the required BIS license.

* * * * *

Accordingly, Sapphire is hereby notified that an administrative proceeding is instituted against it pursuant to Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including, but not limited to, any or all of the following:

- The maximum civil penalty of an amount not to exceed the greater of \$364,992 per violation or an amount that is twice the amount of the transaction that is the basis of the violation with respect to which the penalty is imposed;⁷
- Denial of export privileges;
- Exclusion from practice before BIS; and/or
- Any other liability, sanction, or penalty available under law.

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

Sapphire is further notified that it is entitled to an agency hearing on the record if it files a written demand for one with any answer. *See* 15 C.F.R. § 766.6. Sapphire 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 Sapphire have a proposal to settle this case, it 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, Sapphire's answer must be filed in accordance with the instructions in Section 766.5(a) of the Regulations with:

U.S. Coast Guard ALJ Docketing Center
40 S. Gay Street
Baltimore, Maryland 21202-4022

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

Chief Counsel for Industry and Security
Attention: Adam Berry and Matthew Rosenbaum
Room H-3839
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

⁷ *See* 50 U.S.C. § 4819 (prescribing civil monetary penalty amount for ECRA violation); 15 C.F.R. §§ 6.3(c)(4), 6.4 (adjusting civil monetary penalty amount for inflation).

Adam Berry and Matthew Rosenbaum are the attorneys representing BIS in this case; any communications that Sapphire may wish to have concerning this matter should occur through them. Mr. Berry and Mr. Rosenbaum may be contacted at 202-482-5301.

Sincerely,

John Sonderman
Director
Office of Export Enforcement