

## Cases Closed with \$250,000 Maximum Penalty - No Carve-Out Exception

ORDER DATE	RESPONDENT	OEE CASE NAME	CHARGES	SECTIONS VIOLATED <sup>1</sup>	VSD	RESULT	CRIMINAL CASE
03/12/08	MTS Systems Corporation	In the Matter of MTS Systems Corporation	Misrepresented material facts in connection with the submission of license applications regarding the export of seismic testing equipment to India, with knowledge that the equipment could be used in testing nuclear power plant components or on behalf of Indian nuclear facilities, and with knowledge that an Indian entity on the Entity List had provided funding for one of the transactions.	764.2(g) [2]	No	Settlement Agreement - civil penalty of \$400,000	Yes
04/18/08	Engineering Dynamics, Inc.	In the Matter of Engineering Dynamics, Inc.	Conspired to export an engineering software program to Iran, via Brazil, without the required U.S. Government authorization.	764.2(d) [1]	No	Settlement Agreement - civil penalty of \$132,791.39	Yes
06/11/08	Brighton Equipment Corporation	In the Matter of Brighton Equipment Corporation	Exported software to the People's Republic of China without the required export license.	764.2(a) [1]	No	Settlement Agreement - civil penalty of \$17,500	No
07/16/08	Select Engineering, Inc.	In the Matter of Select Engineering, Inc.	Sold and transported or caused to be transported medical electrode sensor elements and stainless steel snap connectors for export from the United States to Iran, via the United Arab Emirates, with knowledge that a violation would occur	764.2(e) [1]	No	Settlement Agreement - civil penalty of \$52,800	No

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07/16/08	David Rainville	In the Matter of Select Engineering, Inc.	Made false statement to a BIS Special Agent in the course of an investigation.	764.2(g) [1]	No	Settlement Agreement - civil penalty of \$35,200	No
08/11/08	Ingersoll Machine Tools, Inc.	In the Matter of Ingersoll Machine Tools, Inc.	Deemed exports of technology for vertical fiber placement machinery to Italian and Indian nationals and of production technology for 5-axis power mills to Indian nationals in the United States without the required licenses.	764.2(a) [7]	No	Settlement Agreement - civil penalty of \$126,000	No
08/15/08	Johnson Trading and Engineering Co. Ltd. (Taiwan)	In the Matter of Johnson Trading and Engineering Co. Ltd.	Caused the export of computer chips to the People's Republic of China, via Taiwan and Hong Kong, without the required licenses; took actions evade the Regulations and with knowledge that a violation would occur.	764.2(b) [7] 764.2(h) [1] 764.2(e) [1]	No	Settlement Agreement - civil penalty of \$90,000, of which \$30,000 is suspended; implement an internal export controls compliance program within 6 months from the date of entry of the Order; perform audit of its internal export controls compliance program within 24 months of the date of entry of the Order; export privileges denied for five years, all of which is suspended	No
09/22/08	America II Electronics, Inc.	In the Matter of America II Electronics, Inc.	Exported analog-to-digital converters to Russia without the required licenses.	764.2(a) [4]	No	Settlement Agreement - civil penalty of \$170,000	No

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09/26/08	Marysol Technologies, Inc.	In the Matter of Marysol Technologies, Inc.	Exported laser resonator modules, cavities and components to the People's Republic of China, India, Belarus and Russia without the required export licenses	764.2(a) [9]	No	Settlement Agreement - civil penalty of \$180,000	No
12/04/08	PC Universe, Inc.	In the Matter of PC Universe, Inc.	Sold, transported and forwarded digital audio tape drives to Iran with knowledge that a violation would occur	764.2(e) [1]	No	Settlement Agreement - civil penalty of \$37,500, all of which is suspended	No
12/15/08	Gunnar Petzel Medizintechnik	In the Matter of Oyster Bay Pump Works	Caused the export of Ten Station Micro plate Processing Conveyor Systems (MPCS-10) to Cuba via Germany without the required licenses	764.2(b) [3]	No	Settlement Agreement - civil penalty of \$50,000	No
12/18/08	Electronics For Imaging, Inc.	In the Matter of Electronics for Imaging, Inc. (as successor to VUTEk, Inc.)	Exported printer parts and components to Syria without the required export licenses	764.2(a) [4]	No	Settlement Agreement - civil penalty of \$32,000	No
01/26/09	Well Being Enterprise Co., Ltd.	In the Matter of Well Being Enterprise Co., Ltd.	Conspired to export items from the United States to Taiwan without the required license; took action to evade the Regulations; commanded and/or induced an act prohibited by the Regulations	764.2(d) [1] 764.2(h) [1] 764.2(b) [23]	No	Settlement Agreement (after filing of charging letter) - civil penalty of \$250,000, of which \$220,000 is suspended; export privileges denied for 20 years limited to items on the Commerce Control List	No

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01/26/09	Elecmat, Inc.	In the Matter of Well Being Enterprise Co., Ltd.	Conspired to export items from the United States to Taiwan without the required license; engaged in prohibited conduct by exporting certain chemicals, metals and electronic components without the required licenses and with knowledge that violations would occur	764.2(d) [1] 764.2(a) [19] 764.2(e) [19]	No	Settlement Agreement (after filing of charging letter) - export privileges denied for 20 years	No
01/26/09	Hui-Fen Chen, a.k.a. Angela Chen	In the Matter of Well Being Enterprise Co., Ltd.	Conspired to export items from the United States to Taiwan without the required license	764.2(d) [1]	No	Settlement Agreement (after filing of charging letter) - export privileges denied for 20 years limited to items on the Commerce Control List	No
01/28/09	Theresa Huei-Min Chang	In the Matter of Well Being Enterprise Co., Ltd.	Conspired to export items from the United States to Taiwan without the required license and with knowledge that a violation would occur; made a false or misleading statement to officials of the U.S. Government in the course of an investigation	764.2(d) [1] 764.2(e) [1] 764.2(g) [1]	No	Settlement Agreement - export privileges denied for two years limited to items on the Commerce Control List	Yes
02/06/09	Thomas J. Diener	In the Matter of Spares Global	Caused, aided, abetted, and permitted the making of a false representation or statement on SED	764.2(b) [1]	No	Settlement Agreement - civil penalty of \$11,500	No
02/06/09	Ameri-Source, Inc.	In the Matter of Spares Global	Caused, aided, abetted, and permitted the making of a false representation or statement on SED	764.2(b) [1]	No	Settlement Agreement - civil penalty of \$11,500	No

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03/11/09	Infineon Technologies Industrial Power, Inc.	In the Matter of Infineon Technologies Industrial Power, Inc.	Exported certain switching devices to Chile without the required export licenses	764.2(a) [3]	No	Settlement Agreement - civil penalty of \$70,000	No
03/31/09	William Dalton	In the Matter of Falmouth Scientific, Inc.	Made false and misleading statements regarding the export control classification of a tracking system intended for export to the PRC	764.2(g) [1]	No	Settlement Agreement - civil penalty of \$25,000, of which \$15,000 is suspended	No
04/07/09	Falmouth Scientific, Inc.	In the Matter of Falmouth Scientific, Inc.	Made false and misleading statements regarding the export control classification of a tracking system intended for export to the PRC	764.2(g) [1]	No	Settlement Agreement - civil penalty of \$50,000, of which \$25,000 is suspended	No
05/14/09	Micei International	In the Matter of Yuri Montgomery	Caused, aided, abetted, induced and/or permitted violations of a denial order and acted with knowledge that violations would occur	764.2(b) [7] 764.2(e) [7]	No	Civil penalty of \$126,000; export privileges denied for five years (Litigated case; case now on appeal to the D.C. Circuit))	No
06/15/09	Delphi Corporation	In the Matter of Delphi Corporation	Exported triethanolamine to South Africa and the PRC without the required licenses (1C350)	764.2(a) [3]	Partly	Settlement Agreement - civil penalty of \$50,000, all of which is suspended	No
07/06/09	Firth Rixson, Inc. (d/b/a Firth Rixson Monroe)	In the Matter of Firth Rixson, Inc.	Exported 1,055 pounds of Titanium 6-2-4-2 to the PRC without the required licenses (1C202)	764.2(a) [3]	Yes	Settlement Agreement - civil penalty of \$85,000	No

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08/06/09	DPWN Holdings (USA), Inc. (f/k/a DHL Holdings (USA), Inc.) and DHL Express (USA), Inc.	Dalsey, Hillblom and Lynn (DHL)	Failed to comply with recordkeeping requirements; caused, aided and abetted the export of items subject to the EAR to Syria without the required licenses	764.2(i) [90] 764.2(b) [8]	No	Settlement Agreement - joint with BIS and OFAC - civil penalty of \$9,444,744; conduct external audits covering exports to Iran, Syria, and Sudan from March 31, 2007 through December 31, 2011	No
08/13/09	Carol Wilkins	In the Matter of RF Micro Devices, Inc.	Made false statement to BIS in the course of an investigation	764.2(g) [1]	No	Settlement Agreement - civil penalty of \$15,000	No
08/20/09	Eastways Shipping Corporation	In the Matter of Eastways Shipping Corporation	Aided and abetted the export of scrap metal from the United States to Allied Trading Company, an entity in Pakistan that is listed on BIS's Entity List without the required licenses (EAR99)	764.2(b) [3]	No	Settlement Agreement - civil penalty of \$70,000; \$10,000 suspended	No
09/01/09	Derrick Corporation	In the Matter of Derrick Corporation	Exported a Stack Sizer Screening Machine from the United States to Indian Rare Earths, Ltd., an entity in India without the required license (EAR99)	764.2(a) [1]	No	Settlement Agreement - civil penalty of \$30,000	No
09/29/09	Griffin & Howe, Inc.	In the Matter of Griffin & Howe, Inc.	Exported optical sighting devices to Zambia and shotguns to Canada without the required licenses (ECCN 0A987 and 0A984)	764.2(a) [6]	No	Settlement Agreement - civil penalty of \$67,000	No