

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

In the Matter of:	)	
	)	
Performance Medical Supplies	)	Docket No. 05-BIS-03
16 Gardenia Crescent	)	
Cheltenham	)	
Victoria 3192	)	
Australia	)	
	)	
Respondent.	)	
	)	

ORDER RELATING TO PERFORMANCE MEDICAL SUPPLIES.

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) has initiated an administrative proceeding against Performance Medical Supplies (“Performance Medical Supplies”) pursuant to Section 766.3 of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2005)) (“Regulations”),<sup>1</sup> and Section 13(c) of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (“Act”),<sup>2</sup> through

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<sup>1</sup> The violations charged occurred in 2000. The Regulations governing the violations at issue are found in the 2000 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2000)). The 2005 Regulations establish the procedures that apply to this matter.

<sup>2</sup> From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential Notices, the last of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1706 (2000)) (“IEEPA”). On November 13, 2000, the Act was reauthorized and it remained in effect through August 20, 2001. 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)), as extended by the Notice of August 2, 2005 (70 Fed. Reg. 45273, August 5, 2005), has continued the Regulations in effect under IEEPA.

issuance of a charging letter to Performance Medical Supplies that alleged that Performance Medical Supplies committed 10 violations of the Regulations. Specifically, the charges are:

1. *One violation of 15 C.F.R. §764.2(d) - Conspiracy to Export Physical Therapy Equipment to Iran without the Required U.S. Government Authorizations:* In or about April 2000, Performance Medical Supplies conspired and acted in concert with others, known and unknown, to bring about acts that constitute violations of the Regulations by knowingly participating in the export of physical therapy equipment from the United States, via Australia, to Iran without the required U.S. Government authorization. Pursuant to Section 746.7 of the Regulations, authorization was required from the Office of Foreign Assets Control, U.S. Department of Treasury (“OFAC”) before the physical therapy equipment, items subject to the Regulations and the Iranian Transactions Regulations, could be exported from the United States to Iran. In furtherance of the conspiracy, Performance Medical Supplies and its co-conspirator devised and employed a scheme under which Performance Medical Supplies would purchase the items from its co-conspirator in the United States and would then forward the items to Iran.
2. *Three violations of 15 C.F.R. §764.2(b) - Aiding the Export of Physical Therapy Equipment to Iran Without the Required U.S. Government Authorization:* From on or about March 28, 2000 through and including April 7, 2000, Performance Medical Supplies engaged in conduct prohibited by Regulations

when it, on three occasions, aided the export of physical therapy equipment from the United States to Iran, via Australia, without the required U.S. Government authorization. Pursuant to Section 746.7 of the Regulations, authorization from OFAC was required for the export of physical therapy equipment, items subject to the Regulations and the Iranian Transactions Regulations, from the United States to Iran. The U.S. exporter did not have OFAC authorization for the export.

3. *Three violations of 15 C.F.R. § 764.2(e) - Ordering Physical Therapy Equipment with Knowledge that A Violation of the Regulations was to Occur:* On three occasions, Performance Medical Supplies ordered physical therapy equipment with knowledge that violations of the Regulations would occur. At all times relevant hereto, Performance Medical Supplies knew that prior authorization was required from the U.S. Government to export the physical therapy equipment, items subject to the Regulations and the Iranian Transactions Regulations, from the United States to Iran. Performance Medical Supplies ordered the items knowing that they would be exported to Iran without the required U.S. Government authorization.

4. *Three Violations of 15 C.F.R. §764.2(h) - Actions to Evade the Requirements of the Regulations:* On three occasions, Performance Medical Supplies took actions to evade the U.S. Government's licensing requirements for the export of physical therapy equipment to Iran. Specifically, Performance Medical Supplies

participated in the routing of sales to Iran through Australia to conceal the fact that the physical therapy equipment was destined for Iran.

WHEREAS, BIS and Performance Medical Supplies have entered into a Settlement Agreement pursuant to Section 766.18(b) 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, for a period of five years from the date of entry of the Order, Performance Medical Supplies, 16 Gardenia Crescent, Cheltenham, Victoria 3192, Australia, its successors or assigns, and when acting for or on behalf of Performance Medical Supplies, its officers, representatives, agents, or employees (“Denied Person”) may not participate, directly or indirectly, 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.

SECOND, that 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.

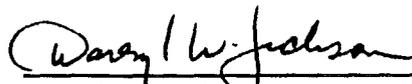
THIRD, that, to prevent evasion of this Order, BIS, after notice and opportunity for comment as provided in Section 766.23 of the Regulations, may make any person, firm, corporation, or business organization related to Performance Medical Supplies by affiliation, ownership, control, or position of responsibility in the conduct of trade or related services subject to the provisions of this Order.

FOURTH, that this Order does not prohibit any export, reexport, or other transaction subject to the Regulations where the only items involved that are subject to the Regulations are the foreign-produced direct product of U.S.-origin technology.

FIFTH, that the charging letter, the Settlement Agreement, this Order, and the record of this case as defined by Section 766.20 of the Regulations shall be made available to the public.

SIXTH, that the administrative law judge shall be notified that this case is withdrawn from adjudication.

This Order, which constitutes the final agency action in this matter, is effective upon publication in the Federal Register.

  
\_\_\_\_\_  
Darryl W. Jackson  
Assistant Secretary of Commerce  
for Export Enforcement

Entered this 9<sup>th</sup> day of November 2005.

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

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Performance Medical Supplies	)	Docket No. 05-BIS-03
16 Gardenia Crescent	)	
Cheltenham	)	
Victoria 3192	)	
Australia	)	
	)	
	)	
Respondent.	)	
	)	

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Respondent, Performance Medical Supplies (“Performance Medical Supplies”), and the Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) (collectively referred to as “Parties”), pursuant to Section 766.18(b) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2005)) (“Regulations”),<sup>1</sup> issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (“Act”).<sup>2</sup>

<sup>1</sup> The violations charged occurred in 2000. The Regulations governing the violations at issue are found in the 2000 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2000)). The 2005 Regulations establish the procedures that apply to this matter.

<sup>2</sup> From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential Notices, the last of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1706 (2000)) (“IEEPA”). On November 13, 2000, the Act was reauthorized and it remained in effect through August 20, 2001. 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)), as extended by the Notice of August 2, 2005 (70 Fed. Reg. 45273, August 5, 2005), has continued the Regulations in effect under IEEPA.

WHEREAS, BIS has initiated an administrative proceeding against Performance Medical Supplies, pursuant to the Act and the Regulations;

WHEREAS, BIS issued a charging letter to Performance Medical Supplies that alleged that Performance Medical Supplies committed 10 violations of the Regulations, specifically:

1. *One violation of 15 C.F.R. §764.2(d) - Conspiracy to Export Physical Therapy Equipment to Iran without the Required U.S. Government Authorizations:* In or about April 2000, Performance Medical Supplies conspired and acted in concert with others, known and unknown, to bring about acts that constitute violations of the Regulations by knowingly participating in the export of physical therapy equipment from the United States, via Australia, to Iran without the required U.S. Government authorization. Pursuant to Section 746.7 of the Regulations, authorization was required from the Office of Foreign Assets Control, U.S. Department of Treasury (“OFAC”) before the physical therapy equipment, items subject to the Regulations and the Iranian Transactions Regulations, could be exported from the United States to Iran. In furtherance of the conspiracy, Performance Medical Supplies and its co-conspirator devised and employed a scheme under which Performance Medical Supplies would purchase the items from its co-conspirator in the United States and would then forward the items to Iran.

2. *Three violations of 15 C.F.R. §764.2(b) - Aiding the Export of Physical Therapy Equipment to Iran Without the Required U.S. Government Authorization:*  
From on or about March 28, 2000 through and including April 7, 2000, Performance Medical Supplies engaged in conduct prohibited by Regulations when it, on three occasions, aided the export of physical therapy equipment from the United States to Iran, via Australia, without the required U.S. Government authorization. Pursuant to Section 746.7 of the Regulations, authorization from OFAC was required for the export of physical therapy equipment, items subject to the Regulations and the Iranian Transactions Regulations, from the United States to Iran. The U.S. exporter did not have OFAC authorization for the export.
3. *Three violations of 15 C.F.R. § 764.2(e) - Ordering Physical Therapy Equipment with Knowledge that A Violation of the Regulations was to Occur:* On three occasions, Performance Medical Supplies ordered physical therapy equipment with knowledge that violations of the Regulations would occur. At all times relevant hereto, Performance Medical Supplies knew that prior authorization was required from the U.S. Government to export the physical therapy equipment, items subject to the Regulations and the Iranian Transactions Regulations, from the United States to Iran. Performance Medical Supplies ordered the items knowing that they would be exported to Iran without the required U.S. Government authorization.

4. *Three Violations of 15 C.F.R. §764.2(h) - Actions to Evade the Requirements of the Regulations:* On three occasions, Performance Medical Supplies took actions to evade the U.S. Government's licensing requirements for the export of physical therapy equipment to Iran. Specifically, Performance Medical Supplies participated in the routing of sales to Iran through Australia to conceal the fact that the physical therapy equipment was destined for Iran.

WHEREAS, Performance Medical Supplies has reviewed the charging letter and is aware of the allegations made against it and the administrative sanctions which could be imposed against it if the allegations are found to be true;

WHEREAS, Performance Medical Supplies fully understands the terms of this Agreement and the Order ("Order") that the Assistant Secretary of Commerce for Export Enforcement will issue if she approves this Agreement as the final resolution of this matter;

WHEREAS, Performance Medical Supplies enters into this Agreement voluntarily and with full knowledge of its rights;

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

WHEREAS, Performance Medical Supplies neither admits nor denies the allegations contained in the charging letter;

WHEREAS, Performance Medical Supplies wishes to settle and dispose of all matters alleged in the charging letter by entering into this Agreement; and

WHEREAS, Performance Medical Supplies agrees to be bound by the Order, if entered;

NOW THEREFORE, the Parties hereby agree as follows:

1. BIS has jurisdiction over Performance Medical Supplies, under the Regulations, in connection with the matters alleged in the charging letter.
2. The following sanctions shall be imposed against Performance Medical Supplies in complete settlement of the violations of the Regulations set forth in the charging letter:
  - a. For a period of five years from the date of entry of the Order, Performance Medical Supplies, its successors or assigns, and, when acting for or on behalf of Performance Medical Supplies, its officers, representatives, agents, or employees (“Denied Person”) may not participate, directly or indirectly, 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.

3. Subject to the approval of this Agreement pursuant to paragraph 8 hereof, Performance Medical Supplies hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violations of this Agreement or the Order, if entered), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in the charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if entered; (c) request any relief from the Order, if entered, including without limitation relief from the terms of a denial order under 15 C.F.R. § 764.3(a)(2); and (d) seek judicial review or otherwise contest the validity of this Agreement or the Order, if entered.

4. Upon entry of the Order, BIS will not initiate any further administrative proceeding against Performance Medical Supplies in connection with any violation of the Act or the Regulations arising out of the transactions identified in the charging letter.

5. BIS will make the charging letter, this Agreement, the Order, if entered, and the record of the case as defined in Section 766.20 of the Regulations available to the public.

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(b) 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 entered, nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the U.S. Government with respect to the facts and circumstances addressed herein.

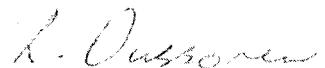
8. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement approves it by entering the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

9. 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

  
Craig S. Burkhardt  
Acting Chief Counsel  
Office of Chief Counsel for Industry and Security

PERFORMANCE MEDICAL SUPPLIES

  
Lee-Anne Oussoren  
Chief Executive Officer

Date: 11-3-05

Date: 2/11/05

MAR 28 2005



**UNITED STATES DEPARTMENT OF COMMERCE**  
**Bureau of Industry and Security**  
Washington, D.C. 20230

**COPY**

REGISTERED MAIL - RETURN RECEIPT REQUESTED

Performance Medical Supplies  
16 Gardenia Crescent  
Cheltenham  
Victoria 3192  
Australia

Attn: *Lee-Anne Oussoren*

Dear Ms. Oussoren:

The Bureau of Industry and Security, United States Department of Commerce ("BIS") has reason to believe that Performance Medical Supplies, of Cheltenham Australia ("Performance Medical Supplies") has committed ten violations of the Export Administration Regulations (the "Regulations"),<sup>1</sup> which are issued under the authority of the Export Administration Act of 1979 (the "Act").<sup>2</sup> Specifically, BIS charges that Performance Medical Supplies committed the following violations:

**Charge 1 (15 C.F.R. §764.2(d) - Conspiracy to Export Physical Therapy Equipment to Iran without the Required U.S. Government Authorizations)**

In or about April 2000, Performance Medical Supplies conspired and acted in concert with others, known and unknown, to bring about acts that constitute violations of the Regulations by knowingly participating in the export of physical therapy equipment from the United States, via Australia, to Iran without the required U.S. Government authorization. Pursuant to Section 746.7 of the Regulations, authorization was required from the Office of Foreign Assets Control, U.S. Department of Treasury ("OFAC") before the physical therapy equipment, items subject to the Regulations and the Iranian

<sup>1</sup> The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2004). The violations charged occurred in 2000. The Regulations governing the violations at issue are found in the 2000 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2000)). The 2004 Regulations establish the procedures that apply to this matter.

<sup>2</sup> 50 U.S.C. app. §§ 2401- 2420 (2000). From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential Notices, the last of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 - 1706 (2000)) ("IEEPA"). On November 13, 2000, the Act was reauthorized by Pub. L. No. 106-508 (114 Stat. 2360 (2000)) and it remained in effect through August 20, 2001. Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp., p. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of August 6, 2004 (69 Fed. Reg. 48763 (August 10, 2004)), continues the Regulations in effect under IEEPA.

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Transactions Regulations, could be exported from the United States to Iran. In furtherance of the conspiracy, Performance Medical Supplies and its co-conspirator devised and employed a scheme under which Performance Medical Supplies would purchase the items from its co-conspirator in the United States and would then forward the items to Iran. In so doing, Performance Medical Supplies committed one violation of Section 764.2(d) of the Regulations.

**Charges 2-4 (15 C.F.R. §764.2(b) - Aiding the Export of Physical Therapy Equipment to Iran Without the Required U.S. Government Authorization)**

As described in greater detail in the Schedule of Violations, which is enclosed herewith and incorporated herein by reference, from on or about March 28, 2000 through and including April 7, 2000, Performance Medical Supplies engaged in conduct prohibited by Regulations when it, on three occasions, aided the export of physical therapy equipment from the United States to Iran, via Australia, without the required U.S. Government authorization. Pursuant to Section 746.7 of the Regulations, authorization from OFAC was required for the export of physical therapy equipment, items subject to the Regulations and the Iranian Transactions Regulations, from the United States to Iran. The U.S. exporter did not have OFAC authorization for the export. In so doing, Performance Medical Supplies committed three violations of Section 764.2(b) of the Regulations.

**Charges 5-7 (15 C.F.R. § 764.2(e) - Ordering Physical Therapy Equipment with Knowledge that A Violation of the Regulations was to Occur)**

As described in greater detail in the Schedule of Violations, which is enclosed herewith and incorporated herein by reference and in connection with export referenced in Charges 2-4, on three occasions, Performance Medical Supplies ordered physical therapy equipment with knowledge that violations of the Regulations would occur. At all times relevant hereto, Performance Medical Supplies knew that prior authorization was required from the U.S. Government to export the physical therapy equipment, items subject to the Regulations and the Iranian Transactions Regulations, from the United States to Iran. Performance Medical Supplies ordered the items knowing that they would be exported to Iran without the required U.S. Government authorization. In so doing, Performance Medical Supplies committed three violations of Section 764.2(e) of the Regulations.

**Charges 8-10 (15 C.F.R. §764.2(h) - Actions to Evade the Requirements of the Regulations)**

As described in greater detail in the Schedule of Violations, which is enclosed herewith and incorporated herein by reference, in connection with the exports referenced in Charges 2-4 above, on three occasions, Performance Medical Supplies took actions to evade the U.S. Government's licensing requirements for the export of physical therapy equipment to Iran. Specifically, Performance Medical Supplies participated in the routing of sales to Iran through Australia to conceal the fact that the physical therapy equipment

was destined for Iran. In so doing, Performance Medical Supplies committed three violations of Section 764.2(h) of the Regulations.

Accordingly, Performance Medical Supplies is hereby notified that an administrative proceeding is instituted against it pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including any or all of the following:

The maximum civil penalty allowed by law of \$11,000 per violation;<sup>3</sup>

Denial of export privileges; and/or

Exclusion from practice before BIS.

If Performance Medical Supplies 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. (Regulations, Sections 766.6 and 766.7). If Performance Medical Supplies defaults, the Administrative Law Judge may find the charges alleged in this letter are true without hearing or further notice to Performance Medical Supplies. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty on each charge in this letter.

Performance Medical Supplies 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. (Regulations, Section 766.6). Performance Medical Supplies is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent it. (Regulations, Sections 766.3(a) and 766.4).

The Regulations provide for settlement without a hearing. (Regulations, Section 766.18). Should Performance Medical Supplies have a proposal to settle this case, Performance Medical Supplies or its representative should transmit the offer to me through 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, Performance Medical Supplies'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

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<sup>3</sup> See 15 C.F.R. §6.4(a)(2) (2003).

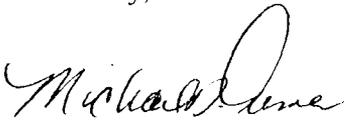
Performance Medical Supplies  
Charging Letter  
Page 4

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

Chief Counsel for Industry and Security  
Attention: Philip Ankel  
Room H-3839  
United States Department of Commerce  
14th Street and Constitution Avenue, N.W.  
Washington, D.C. 20230

Philip Ankel is the attorney representing BIS in this case; any communications that you may wish to have concerning this matter should occur through him. He may be contacted by telephone at (202) 482-5301.

Sincerely,



Michael D. Turner  
Director  
Office of Export Enforcement

Attachment

**SCHEDULE A**  
**PERFORMANCE MEDICAL SUPPLIES**

Charges	Order Date	Item	ECCN	Destination	Value
2,5,8,11	3/28/00	Physical Therapy Equipment	EAR99	Iran	\$1288
3,6,9,12	4/4/00	Physical Therapy Equipment	EAR99	Iran	\$2510
4,7,10,13	4/7/00	Physical Therapy Equipment	EAR99	Iran	\$3604