

UNITED STATES OF AMERICA  
DEPARTMENT OF COMMERCE

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In the Matter of

**Pelco Inc**  
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**Case No. 16 - 01**

**ORDER**

The Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce (“BIS”), has determined to initiate an administrative proceeding pursuant to Section 11(c) of the Export Administration Act of 1979, as amended (50 U.S.C. §§ 2401-2420 (2000)) (the “Act”)<sup>1</sup> and the Export Administration Regulations (currently codified at 15 C.F.R Parts 730-774 (2016)) (the “Regulations”), against Pelco Inc (“Pelco”), a domestic concern, based on allegations set forth in the Proposed Charging Letter, dated 30 September 2016, that alleged that Pelco committed sixty-six violations of the Regulations.

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<sup>1</sup> Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent of which was August 4, 2016 (81 Fed. Reg. 52587 (August 8, 2016)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707 (2000)).

Specifically, the charges are:

1. *Thirty-Two Violations of 15 C.F.R. §760.2(a) - Refusal To Do Business*

During the period May 2011 through January 2016, Pelco engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to the United Arab Emirates and Kuwait, activities in the interstate or foreign commerce of the United States, as defined in Section 760.1(d) of the Regulations.

In connection with these activities, on thirty-two occasions, Pelco, with intent to comply with, further or support an unsanctioned foreign boycott, knowingly agreed to refuse to do business with another person pursuant to an agreement with, a requirement of, or a request from or on behalf of a boycotting country, an activity prohibited by Section 760.2(a) of the Regulations, and not excepted.

2. *Thirty-Four Violations of 15 C.F.R. §760.5 - Failing to Report the Receipt of a Request to Engage in a Restrictive Trade Practice or Foreign Boycott Against a Country Friendly to the United States*

During the period May 2011 through January 2016, Pelco engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to the United Arab Emirates and Kuwait, activities in the interstate or foreign commerce of the United States, as defined in Section 760.1(d) of the Regulations.

In connection with these activities, Pelco, on thirty-four occasions, received a request, to take an action which would have the effect of furthering or supporting a restrictive trade practice or unsanctioned foreign boycott. Pelco failed to report its receipts of these requests to the Department of Commerce, as directed by Section 760.5 of the Regulations.

BIS and Pelco have entered into a Settlement Agreement pursuant to Section 766.18(a) of the Regulations whereby the parties have agreed to settle this matter in accordance with the terms and conditions set forth therein and the terms of the Settlement Agreement have been approved by me.

IT IS THEREFORE ORDERED THAT:

FIRST, a civil penalty of \$ 162,000 is assessed against Pelco and shall be paid to the U.S. Department of Commerce within 30 days from the date of entry of this Order. Payment of this sum shall be made in the manner specified in the attached instructions.

SECOND, pursuant to the Debt Collections Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (1983 and Supp. 2001)), 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, Pelco will be assessed, in addition to the full amount of the penalty and interest, a penalty charge and an administrative charge, as more fully described in the attached Notice.

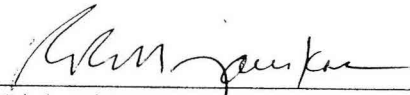
THIRD, the timely payment of the sum of \$ 162,000 is hereby made a condition to the granting, restoration or continuing validity of any export license, permission, or privilege granted, or to be granted, to Pelco.

Accordingly, if Pelco should fail to pay the civil penalty in a timely manner, the undersigned may enter an Order denying all of Pelco's export privileges for a period of one year from the date of the entry of this Order.



FOURTH, the Proposed Charging Letter, the Settlement Agreement and this Order shall be made available to the public, and a copy of this Order shall be served upon Pelco.

This Order, which constitutes the final agency action in this matter, is effective immediately.

  
Richard R Majauskas  
Acting Assistant Secretary of Commerce for  
Export Enforcement

Entered this 17<sup>TH</sup> day of February, 2017

Attachments

INSTRUCTIONS FOR PAYMENT OF SETTLEMENT AMOUNT

1. The check should be made payable to:

U.S. DEPARTMENT OF COMMERCE

2. The check should be mailed to:

U.S. Department of Commerce  
Bureau of Industry and Security  
**Room 6622**  
14th & Constitution Avenue, N.W.  
Washington, D.C. 20230

**Attention: Christine Wheeler**

## NOTICE

The Order to which this Notice is attached describes the reasons for the assessment of the civil monetary penalty. It also specifies the amount owed and the date by which payment of the civil penalty is due and payable.

Under the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (1983 and Supp. 2001)) and the Federal Claims Collection Standards (65 Fed. Reg. 70390-70406, November 22, 2000, to be codified at 31 C.F.R. Parts 900-904), interest accrues on any and all civil monetary penalties owed and unpaid under the Order, from the date of the Order until paid in full. The rate of interest assessed respondent is the rate of the current value of funds to the U.S. Treasury on the date that the Order was entered. However, interest is waived on any portion paid within 30 days of the date of the Order. See 31 U.S.C. §3717 and 31 C.F.R. §901.9.

The civil monetary penalty will be delinquent if not paid by the due date specified in the Order. If the penalty becomes delinquent, interest will continue to accrue on the balance remaining due and unpaid, and respondent will also be assessed both an administrative charge to cover the cost of processing and handling the delinquent claim and a penalty charge of six percent per year. However, although the penalty charge will be computed from the date that the civil penalty becomes delinquent, it will be assessed only on sums due and unpaid for over 90 days after that date. See 31 U.S.C. §3717 and 4 C.F.R. §901.9.

The foregoing constitutes the initial written notice and demand to respondent in accordance with Section 901.2 of the Federal Claims Collection Standards (31 C.F.R. §901.2(b)).

UNITED STATES OF AMERICA  
DEPARTMENT OF COMMERCE

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In the Matter of )  
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**Pelco Inc** )  
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**Case No. 16 - 01**

**SETTLEMENT AGREEMENT**

This agreement is made by and between Pelco Inc ("Pelco"), a domestic concern, and the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce ("BIS"), pursuant to Section 766.18(a) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2016)) (the "Regulations"), issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. §§ 2401-2420 (2000)) (the "Act").<sup>1</sup>

<sup>1</sup> Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent of which was August 4, 2016 (81 Fed. Reg. 52587 (August 8, 2016)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707 (2000)).

WHEREAS, Pelco has voluntarily disclosed information concerning certain of its transactions to BIS; and

WHEREAS, BIS has notified Pelco of its intention to initiate an administrative proceeding against Pelco pursuant to the Act and the Regulations by issuing the Proposed Charging Letter dated 30 September 2016, a copy of which is attached hereto and incorporated herein by this reference; and

WHEREAS, Pelco has reviewed the Proposed Charging Letter and is aware of the allegations against it and the administrative sanctions which could be imposed against it if the allegations are found to be true; Pelco fully understands the terms of this Settlement Agreement, and enters into this Settlement Agreement voluntarily and with full knowledge of its rights; and Pelco states that no promises or representations have been made to it other than the agreements and considerations herein expressed; and

WHEREAS, Pelco neither admits nor denies the truth of the allegations, but wishes to settle and dispose of the allegations made in the Proposed Charging Letter by entering into this Settlement Agreement; and

WHEREAS, Pelco agrees to be bound by the appropriate Order ("Order") when entered;

NOW, THEREFORE, Pelco and BIS agree as follows:

1. Under the Act and the Regulations, BIS has jurisdiction over Pelco with respect to the matters alleged in the Proposed Charging Letter.
2. BIS will impose a civil penalty in the amount of \$ 162,000. Pelco will pay to the U.S. Department of Commerce, within 30 days from the date of entry of the Order, and in accordance with the terms of the Order, when entered, the amount of \$ 162,000 in complete settlement of all matters set forth in the Proposed Charging Letter.
3. The timely payment of the amount agreed to in paragraph 2 is hereby made a condition of the granting, restoration, or continuing validity of any export license, permission, or privilege granted, or to be granted, to Pelco.

Failure to make payment of this amount shall result in the denial of all of Pelco's export privileges for a period of one year from the date of entry of the Order.



4. Subject to the approval of this Settlement Agreement, pursuant to paragraph 9 hereof, Pelco hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violation of this Settlement Agreement or the Order, when entered) including, without limitation, any right to:
  - A. An administrative hearing regarding the allegations in the Proposed Charging Letter;
  - B. Request a refund of the funds paid by Pelco pursuant to this Settlement Agreement and the Order, when entered; or
  - C. Seek judicial review or otherwise contest the validity of this Settlement Agreement or the Order, when entered.
  
5. BIS, upon entry of the Order, will not initiate any administrative or judicial proceeding, or make a referral to the Department of Justice for criminal proceedings against Pelco with respect to any violation of Section 8 of the Act or Part 760 of the Regulations arising out of the transactions set forth in the Proposed Charging Letter or any other transaction that was disclosed to or reviewed by BIS in the course of its investigation.



6. Pelco understands that BIS will disclose publicly the Proposed Charging Letter, this Settlement Agreement, and the Order, when entered.
7. This Settlement Agreement is for settlement purposes only, and does not constitute an admission by Pelco that it has violated the Regulations, or an admission of the truth of any allegation contained in the Proposed Charging Letter or referred to in this Settlement Agreement.

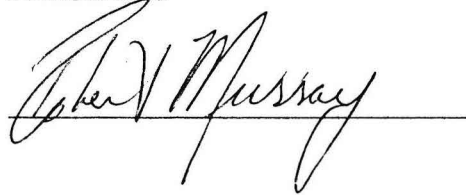
Therefore, if this Settlement Agreement is not accepted and the Order not entered by the Assistant Secretary for Export Enforcement, BIS may not use this Settlement Agreement against Pelco in any administrative or judicial proceeding.

8. No agreement, understanding, representation or interpretation not contained in this Settlement Agreement may be used to vary or otherwise affect the terms of this Settlement Agreement or the Order, when entered, nor shall this Settlement Agreement bind, constrain or otherwise limit any action by any other agency or department of the United States Government with respect to the facts and circumstances herein addressed.

This paragraph shall not limit Pelco's right to challenge any action brought by any other agency based on a referral by BIS or any employee thereof, in contravention of paragraph 5 of this Settlement Agreement.

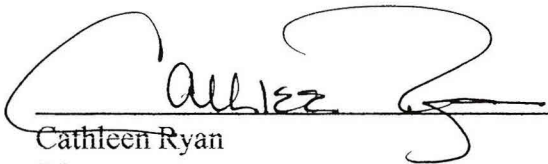
9. This Settlement Agreement will become binding on BIS only when approved by the Assistant Secretary for Export Enforcement by entering the Order.

PELCO INC



DATE: FEBRUARY 7, 2017

U.S. DEPARTMENT OF COMMERCE



Cathleen Ryan  
Director  
Office of Antiboycott Compliance

DATE: 9 FEBRUARY 2017

Attachment



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

**PROPOSED CHARGING LETTER**

30 September 2016

Pelco Inc  
3500 Pelco Way  
Clovis, CA 93612.5699

Attention : Robert Murray  
Vice President Tax & Customs, Americas

Case No. 16.01

Gentlemen/Ladies:

We, the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce ("BIS"), have reason to believe that you, Pelco Inc, on sixty-six occasions, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2016)) (the "Regulations"),<sup>1</sup> which are issued under the authority of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000))(the "Act").<sup>2</sup>

We charge that you committed thirty-two violations of Section 760.2(a) of the Regulations, in that, on thirty-two occasions, with intent to comply with, further or support an unsanctioned foreign boycott, you knowingly agreed to refuse to do business with another person pursuant to an agreement with, a requirement of, or a request from or on behalf of a boycotting country.

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<sup>1</sup> The transactions and violations alleged occurred during the years 2011 through 2016. The Regulations governing the violations at issue are found in the 2011, 2012, 2013, 2014, 2015 and 2016 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2011, 2012, 2013, 2014, 2015 and 2016)). The prior years' Regulations are substantially the same as the 2016 version of the Regulations which governs the procedural aspects of this matter.

<sup>2</sup> Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent of which was August 4, 2016 (81 Fed. Reg. 52587 (August 8, 2016)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707 (2006 & Supp IV 2010)).



We also charge that you committed thirty-four violations of Section 760.5 of the Regulations, in that, on thirty-four occasions, you failed to report to the Department of Commerce ("Department") your receipt of a request to engage in a restrictive trade practice or boycott, as required by the Regulations.

We allege that:

You, Pelco Inc, are, and at all times relevant were, a domestic concern, organized under the laws of the United States and doing business in the State of California; as such, you are a United States person, as defined in Section 760.1(b) of the Regulations.

During the period May 2011 through January 2016, you engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to the United Arab Emirates and Kuwait, activities in the interstate or foreign commerce of the United States, as defined in Section 760.1(d) of the Regulations.

**Charges 1 - 32 (15 C.F.R. § 760.2(a) - Refusal To Do Business)**

In connection with the activities referred to above, during the period May 2011 through January 2016, on thirty-two occasions, as described in Table A, which is attached and incorporated herein by this reference, you received a condition, set out in purchase orders from customers in the United Arab Emirates and Kuwait, respectively, requiring you to conform to Israeli boycott regulations or to comply with the Israeli boycott list. You failed to delete, amend or otherwise take exception to these conditions.

By fulfilling the orders, without deleting, amending or otherwise taking exception to these conditions, you, with intent to comply with, further or support an unsanctioned foreign boycott, knowingly agreed to refuse to do business with another person pursuant to an agreement with, a requirement of, or a request from or on behalf of a boycotting country, an activity prohibited by Section 760.2(a) of the Regulations, and not excepted. We therefore charge you with thirty-two violations of Section 760.2(a).

**Charges 33 - 66 (15 C.F.R. § 760.5 - Failing to Report the Receipt of a Request to Engage in a Restrictive Trade Practice or Foreign Boycott Against a Country Friendly to the United States)**

In connection with the activities referred to above, during the period May 2011 through January 2016, on thirty-four occasions, you received a request, as described in Table B, which is attached and incorporated herein by this reference, to take an action which would have the effect of furthering or supporting a restrictive trade practice or unsanctioned foreign boycott.



Section 760.5 of the Regulations requires United States persons to report to the Department their receipts of such requests. You failed to report to the Department your receipts of these requests.

By failing to report your receipts of these requests, as directed by Section 760.5 of the Regulations, you are in violation of Section 760.5. We therefore charge you with five violations of Section 760.5 of the Regulations.

Accordingly, administrative proceedings are instituted against you pursuant to Part 766 of the Regulations for the purpose of obtaining an Order imposing administrative sanctions.<sup>3</sup>

You are entitled to a hearing on the record as provided in Section 766.6 of the Regulations. If you wish to have a hearing on the record, you must file a written demand for it with your answer. Under Sections 766.3(a) and 766.4 of the Regulations, you are entitled to be represented by counsel or other authorized representative who has power of attorney to represent you and, under Section 766.18 of the Regulations, to seek a settlement agreement without a hearing.

Under the Small Business Regulatory Enforcement Flexibility Act, you may be eligible for assistance from the Office of the National Ombudsman of the Small Business Administration in this matter.<sup>4</sup>

If you fail to answer the allegations contained in this letter within thirty (30) days after service as provided in Section 766.6, such failure will be treated as a default under Section 766.7.

As provided in Section 766.3, I am referring this matter to the Administrative Law Judge. Pursuant to an Interagency Agreement between BIS and the U.S. Coast Guard, the U.S. Coast Guard is providing administrative law judge services, to the extent that such services are required under the Regulations, in connection with the matters set forth in this letter.

Therefore, in accordance with the instructions in Section 766.5(a) of the Regulations, your answer should be filed with:

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<sup>3</sup> Administrative sanctions may include any or all the following:

- a. A maximum civil penalty of the greater of \$250,000 per violation or twice the value of the transaction that is the basis of the violation (see International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007)).
- b. Denial of export privileges (see § 764.3(a)(2) of the Regulations); and/or
- c. Exclusion from practice before BIS (see § 764.3(a)(3) of the Regulations).

<sup>4</sup> To determine eligibility and get more information, please see: <http://www.sba.gov/ombudsman>.

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

Attention: Administrative Law Judge

Also, in accordance with the instructions in Section 766.5(b) of the Regulations, a copy of your answer should also be served on the Bureau of Industry and Security at:

Office of the Chief Counsel for Industry and Security  
Room H-3839  
Bureau of Industry and Security  
U.S. Department of Commerce  
14th Street & Constitution Avenue, N.W.  
Washington, D.C. 20230

Sincerely,

Cathleen Ryan  
Director  
Office of Antiboycott Compliance

Enclosures

**TABLE A**

**Schedule of Alleged Violations of Section 760.2(a)**

Agreements to Refuse to Do Business

**Pelco, Inc.**

Case No. 16.01

<b>Item</b>	<b>Pelco Reference</b>	<b>Date Request Received</b>	<b>Date of Violation*</b>	<b>Boycotting Country</b>	<b>Boycott Request</b>
1	Purchase Order # DPO 1103653/ Sales Order # 410389	05.05.11	05.05.11	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
2	Purchase Order # DPO 1106233/ Sales Order # 441314	07.13.11	07.13.11	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
3	Purchase Order # APO 1202874/ Sales Order #	05.27.12	05.27.12	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
4	Purchase Order # APO 1203446/ Sales Order #	06.25.12	06.25.12	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
5	Purchase Order # APO 1405277/ Sales Order # 240490	09.16.14	09.16.14	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
6	Purchase Order # APO 1405486/ Sales Order # 247550	09.25.14	09.25.14	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
7	Purchase Order # APO 1405575/ Sales Order # 247805	09.30.14	10.02.14	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
8	Purchase Order # APO 1405984/ Sales Order # 259147	10.20.14	10.27.14	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
9	Purchase Order # APO 1406844/ Sales Order # 298551	01.14.15	02.23.15	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"

\* Date order shipped without exception taken to prohibited condition



**TABLE A**

**Schedule of Alleged Violations of Section 760.2(a)**  
Agreements to Refuse to Do Business

**Pelco, Inc.**  
Case No. 16.01

<b>Item</b>	<b>Pelco Reference</b>	<b>Date Request Received</b>	<b>Date of Violation*</b>	<b>Boycotting Country</b>	<b>Boycott Request</b>
10	Purchase Order # 4300002704/ Sales Order # 597721	08.13.12	08.31.12	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
11	Purchase Order # 4300003861/ Sales Order # 833105	10.09.13	11.27.13	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
12	Purchase Order # 4300003991/ Sales Order # 857438	11.28.13	12.11.13	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
13	Purchase Order # 4300004005/ Sales Order # 863066	12.09.13	12.11.13	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
14	Purchase Order # 4300004136/ Sales Order # 112219	01.22.14	01.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
15	Purchase Order # 4300004196/ Sales Order # 121780	02.06.14	02.11.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
16	Purchase Order # 4300004223/ Sales Order # 125411	02.16.14	02.18.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST

\* Date order shipped without exception taken to prohibited condition

**TABLE A**

**Schedule of Alleged Violations of Section 760.2(a)**  
Agreements to Refuse to Do Business

**Pelco, Inc.**  
Case No. 16.01

<b>Item</b>	<b>Pelco Reference</b>	<b>Date Request Received</b>	<b>Date of Violation*</b>	<b>Boycotting Country</b>	<b>Boycott Request</b>
17	Purchase Order # 4300004429/ Sales Order # 166460	05.07.14	05.07.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
18	Purchase Order # 4300004560/ Sales Order # 171385	06.09.14	12.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
19	Purchase Order # 4300004488/ Sales Order # 174385	05.18.14	12.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
20	Purchase Order # 4300004532/ Sales Order # 184356	06.03.14	10.24.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
21	Purchase Order # 4300004586/ Sales Order # 190514	06.18.14	11.06.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
22	Purchase Order # 4300004671/ Sales Order # 195512	07.06.14	07.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
23	Purchase Order # 4300004655/ Sales Order # 201077	06.29.14	07.18.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST

\* Date order shipped without exception taken to prohibited condition

**TABLE A**

**Schedule of Alleged Violations of Section 760.2(a)**  
Agreements to Refuse to Do Business

**Pelco, Inc.**  
Case No. 16.01

<b>Item</b>	<b>Pelco Reference</b>	<b>Date Request Received</b>	<b>Date of Violation*</b>	<b>Boycotting Country</b>	<b>Boycott Request</b>
24	Purchase Order # 4300004586/ Sales Order # 232603	06.18.14	09.04.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
25	Purchase Order # 4300005083/ Sales Order # 258487	10.20.14	11.12.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
26	Purchase Order # 4300005278/ Sales Order # 291216	12.15.14	02.05.15	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
27	Purchase Order # 4300005710/ Sales Order # 350974	05.06.15	05.27.15	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
28	Purchase Order # 4300006120/ Sales Order # 416738	09.15.15	10.09.15	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
29	Purchase Order # 4300006247/ Sales Order # 432183	10.28.15	11.01.15	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
30	Purchase Order # 4300006353/ Sales Order # 442650	11.26.15	12.28.15	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST

\* Date order shipped without exception taken to prohibited condition

**TABLE A**

**Schedule of Alleged Violations of Section 760.2(a)**  
Agreements to Refuse to Do Business

**Pelco, Inc.**  
Case No. 16.01

<b>Item</b>	<b>Pelco Reference</b>	<b>Date Request Received</b>	<b>Date of Violation*</b>	<b>Boycotting Country</b>	<b>Boycott Request</b>
31	Purchase Order # 4300006462/ Sales Order # 478319	12.28.15	01.05.16	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
32	Purchase Order # 4300006478/ Sales Order # 478752	12.31.15	01.25.16	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST

\* Date order shipped without exception taken to prohibited condition

**TABLE B**

**Schedule of Alleged Violations of Section 760.5**  
Failure to Report Receipts of Boycott Requests

**Pelco, Inc.**  
Case No. 16.01

Item	Pelco Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
1	Purchase Order # DPO 1103653/ Sales Order # 410389	05.05.11	07.31.11	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
2	Purchase Order # DPO 1106233/ Sales Order # 441314	07.13.11	10.31.11	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
3	Purchase Order # APO 1202874/ Sales Order #	05.27.12	07.31.12	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
4	Purchase Order # APO 1203446/ Sales Order #	06.25.12	07.31.12	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
5	Purchase Order # APO 1405277/ Sales Order # 240490	09.16.14	10.31.14	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
6	Purchase Order # APO 1405486/ Sales Order # 247550	09.25.14	10.31.14	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
7	Purchase Order # APO 1405575/ Sales Order # 247805	09.30.14	10.31.14	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
8	Purchase Order # APO 1405984/ Sales Order # 259147	10.20.14	01.31.15	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"
9	Purchase Order # APO 1406844/ Sales Order # 298551	01.14.15	04.30.15	U.A.E.	PRODUCTS MUST CONFORM TO "ISRAELI BOYCOTT & UAE REGULATIONS"

\* Where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked by the last day of the month following the calendar quarter in which the request was received (§ 760.5(b)(4)(i)).



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**Schedule of Alleged Violations of Section 760.5**  
**Failure to Report Receipts of Boycott Requests**

**Pelco, Inc.**  
Case No. 16.01

<b>Item</b>	<b>Pelco Reference</b>	<b>Date Request Received</b>	<b>Date Reporting Violation*</b>	<b>Boycotting Country</b>	<b>Boycott Request</b>
10	Purchase Order # 4300002704/ Sales Order # 597721	08.13.12	10.31.12	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
11	Purchase Order # 4300003861/ Sales Order # 833105	10.09.13	01.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
12	Purchase Order # 4300003991/ Sales Order # 857438	11.28.13	01.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
13	Purchase Order # 4300004005/ Sales Order # 863066	12.09.13	01.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
14	Purchase Order # 4300004136/ Sales Order # 112219	01.22.14	04.30.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
15	Purchase Order # 4300004196/ Sales Order # 121780	02.06.14	04.30.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
16	Purchase Order # 4300004223/ Sales Order # 125411	02.16.14	04.30.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST

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**TABLE B**

**Schedule of Alleged Violations of Section 760.5**  
Failure to Report Receipts of Boycott Requests

**Pelco, Inc.**  
Case No. 16.01

Item	Pelco Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
17	Purchase Order # 4300004429/ Sales Order # 166460	05.07.14	07.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
18	Purchase Order # 4300004560/ Sales Order # 171385	06.09.14	07.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
19	Purchase Order # 4300004488/ Sales Order # 174385	05.18.14	07.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
20	Purchase Order # 4300004532/ Sales Order # 184356	06.03.14	07.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
21	Purchase Order # 4300004586/ Sales Order # 190514	06.18.14	07.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
22	Purchase Order # 4300004671/ Sales Order # 195512	07.06.14	10.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
23	Purchase Order # 4300004655/ Sales Order # 201077	06.29.14	07.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST

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**TABLE B**

**Schedule of Alleged Violations of Section 760.5**

Failure to Report Receipts of Boycott Requests

**Pelco, Inc.**

Case No. 16.01

<b>Item</b>	<b>Pelco Reference</b>	<b>Date Request Received</b>	<b>Date Reporting Violation*</b>	<b>Boycotting Country</b>	<b>Boycott Request</b>
24	Purchase Order # 4300004586/ Sales Order # 232603	06.18.14	07.31.14	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
25	Purchase Order # 4300005083/ Sales Order # 258487	10.20.14	01.31.15	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
26	Purchase Order # 4300005278/ Sales Order # 291216	12.15.14	01.31.15	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
27	Purchase Order # 4300005710/ Sales Order # 350974	05.06.15	07.31.15	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
28	Purchase Order # 4300006120/ Sales Order # 416738	09.15.15	10.31.15	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
29	Purchase Order # 4300006247/ Sales Order # 432183	10.28.15	01.31.16	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
30	Purchase Order # 4300006353/ Sales Order # 442650	11.26.15	01.31.16	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST

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**Failure to Report Receipts of Boycott Requests**

**Pelco, Inc.**  
Case No. 16.01

<b>Item</b>	<b>Pelco Reference</b>	<b>Date Request Received</b>	<b>Date Reporting Violation*</b>	<b>Boycotting Country</b>	<b>Boycott Request</b>
31	Purchase Order # 4300006462/ Sales Order # 478319	12.28.15	01.31.16	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
32	Purchase Order # 4300006478/ Sales Order # 478752	12.31.15	01.31.16	Kuwait	PLEASE ALSO ENSURE THAT THE CONSIGNMENT DOES NOT CONTAIN ANY GOODS MANUFACTURED BY THOSE...ON THE ISRAELI BOYCOTT LIST
33	Letter of Credit # 06680LCU1400097	05.02.14	07.31.14	U.A.E.	DOCUMENTS REQUIRED... A CERTIFICATE EVIDENCING THAT THE GOODS ARE NEITHER OF ISRAELI ORIGIN NOR DO THEY CONTAIN ISRAELI MATERIALS IS REQUIRED....
34	Letter of Credit # 06680LCU1400185	07.17.14	10.31.14	U.A.E.	DOCUMENTS REQUIRED... A CERTIFICATE EVIDENCING THAT THE GOODS ARE NEITHER OF ISRAELI ORIGIN NOR DO THEY CONTAIN ISRAELI MATERIALS IS REQUIRED....

\* Where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked by the last day of the month following the calendar quarter in which the request was received (§ 760.5(b)(4)(i)).