

UNITED STATES OF AMERICA
DEPARTMENT OF COMMERCE

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In the Matter of)
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Oxyde Chemicals, Inc.)
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Case No. 14-05

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”)¹ and the Export Administration Regulations (currently codified at 15 C.F.R. Part 730 – 774 (2017)) (the “Regulations”), against Oxyde Chemicals, Inc. (“Oxyde”), a domestic concern, organized under the laws of the United States and doing business in the State of Texas, based on allegations set forth in the Proposed Charging Letter, dated September 5, 2017, that alleged that Oxyde committed seventeen violations of the Regulations.

¹ 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 being that of August 15, 2017 (82 Fed. Reg. 39005 (Aug. 16, 2017)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, et seq. (2012)).

Specifically, the charges are:

1. Two violations of 15 C.F.R. §760.2(a) – Refusal to Do Business:

During the period August 2010 through January 2011, Oxyde engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to the United Arab Emirates, 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, Oxyde, on two occasions, with intent to comply with further or support an unsanctioned foreign boycott, received a condition, set out in the letters of credit from customers in the United Arab Emirates, requiring Oxyde to comply with the Israeli boycott list. Oxyde failed to delete, amend or otherwise take exception to this condition, an activity prohibited by Section 760.2(a) of the Regulations, and not excepted.

2. Four violations of 15 C.F.R. §760.2(d) – Furnishing Information about Business Relationships with Boycotted Countries or Blacklisted Persons:

During the period August 2010 through March 2011, Oxyde engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to Lebanon and the United Arab Emirates, 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, Oxyde, on four occasions, with intent to comply with further or support an unsanctioned foreign boycott, furnished information concerning

another person's business relationships with another person who is known or believed to be restricted from having any business relationship with or in a boycotting country, an activity prohibited by Section 760.2(d) of the Regulations, and not excepted.

3. *Eleven 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 2010 through April 2014, Oxyde engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to Bahrain, Lebanon, Libya and the United Arab Emirates, 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, Oxyde, on eleven 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. Oxyde failed to report its receipts of these requests to the Department of Commerce, as required by Section 760.5 of the Regulations.

BIS and Oxyde 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 \$59,600 is assessed against Oxyde which shall be paid to the U.S. Department of Commerce in four installments, in the following manner: \$14,900 within 30 days from the date of entry of the Order; \$14,900 no later than the four month anniversary of the date of entry of the Order; \$14,900 no later than the eight month anniversary of the date of entry of the Order; and \$14,900 no later than the twelve month anniversary of the date of entry of the Order. Payment of these sums shall be made in the manner specified in the attached instructions.

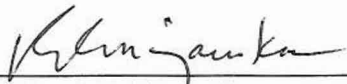
SECOND, pursuant to the Debt Collections Act of 1982, as amended (31 U.S.C. §§3701 – 3720E (1983 and Supp. 2001)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice and, if payment is not made by the due date specified herein, Oxyde will be assessed, 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 \$59,600 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 Oxyde.

Accordingly, if Oxyde should fail to pay the civil penalty in a timely manner, the undersigned may enter an Order denying all of Oxyde'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 Oxyde.

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 28th day of September, 2017

Attachments

UNITED STATES OF AMERICA
DEPARTMENT OF COMMERCE

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In the Matter of)
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Oxyde Chemicals, Inc.)
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Case No. 14-05

SETTLEMENT AGREEMENT

This agreement is made by and between Oxyde Chemicals, Inc. (“Oxyde”), a domestic concern, organized under the laws of the United States and doing business in the State of Texas, 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. Part 730 – 774 (2017)) (the “Regulations”) issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. §§2401 – 2420 (2000)) (the “Act”)¹.

¹ 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 being that of August 15, 2017 (82 Fed. Reg. 39005 (Aug. 16, 2017)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, et seq. (2012)).



WHEREAS, BIS has notified Oxyde of its intention to initiate an administrative proceeding against Oxyde pursuant to the Act and the Regulations by issuing the Proposed Charging Letter dated September 5, 2017, a copy of which is attached hereto and incorporated herein by this reference; and

WHEREAS, Oxyde 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; Oxyde fully understands the terms of this Settlement Agreement, and enters into this Settlement Agreement voluntarily and with full knowledge of its rights; and Oxyde states that no promises or representations have been made to it other than the agreements and considerations herein expressed; and

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

NOW THEREFORE, Oxyde and BIS agree as follows:

1. Under the Act and the Regulations, BIS has jurisdiction over Oxyde with respect to the matters alleged in the Proposed Charging Letter.

2. BIS will impose a civil penalty in the amount of \$59,600. Oxyde 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 \$59,600 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 Oxyde. Failure to make payment of this amount shall result in the denial of all of Oxyde'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, Oxyde 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 Oxyde 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.



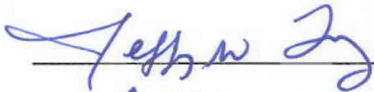
5. BIS, upon entry of the Order, will not initiate any administrative or judicial proceeding, or make a referral to the Department of Justice for criminal proceedings against Oxyde with respect to any violation of Section 8 of the Act or Part 760 of the Regulations arising out of the transactions set 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. Oxyde 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 Oxyde 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 Oxyde 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 Oxyde'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.

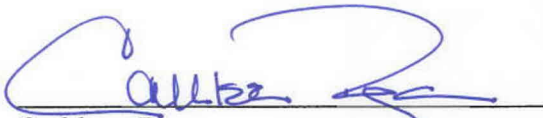
OXYDE CHEMICALS, INC.



JEFF TOMZ
CFO

DATE: September 13, 2017

U.S. DEPARTMENT OF COMMERCE



Cathleen Ryan
Director
Office of Antiboycott Compliance

DATE: 15 SEPTEMBER 2017

Attachment



UNITED STATES DEPARTMENT OF COMMERCE
Assistant Secretary for Export Enforcement
Washington, D.C. 20230

PROPOSED CHARGING LETTER

September 5, 2017

Oxyde Chemicals, Inc.
225 Pennbriht Drive, Suite 101
Houston, Texas 77090

Attention: Jeffery Tomz
Chief Financial Officer

Case No. 14-05

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, Oxyde Chemicals Inc., on seventeen occasions, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2017)) (the "Regulations")¹, 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")².

We charge that you committed two violations of Section 760.2(a) of the Regulations, in that, on 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.

We also charge that you committed four violations of Section 760.2(d) of the Regulations, in that, on four occasions, with intent to comply with, further or support an unsanctioned foreign boycott, you furnished information concerning another person's business relationships with another person who is known or believed to be restricted from having any business relationship with or in a boycotting country.

Lastly, we charge that you committed eleven violations of Section 760.5 of the Regulations, in that, on eleven occasions, you failed to report to the Department of Commerce your receipt of a request to engage in a restrictive trade practice or boycott, as required by the Regulations.

¹ The transactions and violations alleged occurred during the years 2010, 2011, 2012, 2013 and 2014. The Regulations governing the violations at issue are found in the 2010, 2011, 2012, 2013 and 2014 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2010, 2011, 2012, 2013 and 2014)). The prior years' Regulations are substantially the same as the 2017 version of the Regulations which governs the procedural aspects of this matter.

² 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 being that of August 15, 2017 (82 Fed. Reg. 39005 (Aug. 16, 2017)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, et seq. (2012)).



We allege that:

You, Oxyde Chemicals 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 Texas. As such, you are a United States person, as defined in Section 760.1(b) of the Regulations.

During the period May 2010 through July 2014, you engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to Bahrain, Lebanon, Libya and the United Arab Emirates, activities in the interstate or foreign commerce of the United States, as defined in Section 760.1(d) of the Regulations.

Charges 1 - 2 (15 C.F.R. §760.2(a) – Refusal to Do Business)

In connection with the activities referred to above, during the period August 2010 through January 2011, on two occasions, as described in Table A, which is attached and incorporated herein by this reference, you received a condition, set out in the letters of credit from customers in the United Arab Emirates, requiring you to comply with the Israeli boycott list. You failed to delete, amend or otherwise take exception to this condition.

By fulfilling the terms of the letters of credit, without deleting, amending or otherwise taking exception to this condition, 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 two violations of Section 760.2(a).

Charges 3 - 6 (15 C.F.R. §760.2(d) – Furnishing Information about Business Relationships with Boycotted Countries or Blacklisted Persons)

In connection with the activities referred to above, during the period August 2010 through March 2011, on four occasions, you furnished to the letter of credit advising bank, information, as described in Table B, which is attached and incorporated herein by this reference, concerning another person's business relationships with another person who is known or believed to be restricted from having any business relationship with or in a boycotting country.

Providing the information described in Table B, with intent to comply with, further or support an unsanctioned foreign boycott, is an activity prohibited by Section 760.2(d) of the Regulations, and not excepted. We therefore charge you with four violations of Section 760.2(d).

Charges 7 – 17 (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 2010 through April 2014, on eleven occasions, you received a request, as described in Table C, 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 of Commerce their receipts of such requests. You failed to report to the Department of Commerce your receipts of these requests.

By failing to report your receipts of these requests, described in Table C, as directed by Section 760.5 of the Regulations, you are in violation of Section 760.5. We therefore charge you with eleven 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.³

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, you may also 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.⁴

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 of the Regulations, 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.

³ Administrative sanctions may include any or all of the following:

- a. A maximum civil penalty of the greater of \$289,238 per violation or twice the value of the transaction that is the basis of the violation (see 15 C.F.R. §6.4(b)(4) and 81 Fed. Reg. 9532 (December 28, 2016)). The amount is subject to annual increases pursuant to the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, Sec. 701 of Public Law 114-74, enacted on November 2, 2015. (See also 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).

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

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

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 the following address:

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

Sincerely,

Cathleen Ryan
Director
Office of Antiboycott Compliance

Enclosures

TABLE A

Schedule of Alleged Violations of Section 760.2(a)
AGREEING TO REFUSE TO DO BUSINESS

OXYDE CHEMICALS INC.

Case No. 14-05

Item	Transaction File(s)	Date Condition Received	Boycotting Country	Agreement to Refuse to do Business
1	306926 L/C #9004IMDEF0015310	08/02/10	U.A.E.	46A: DOCUMENTS REQUIRED... 4. MARINE INSURANCE POLICY/CERTIFICATE...POLICIES ISSUED BY COMPANIES WHOSE NAME ARE INCLUDED IN ISRAELI BOYCOTT LIST ARE NOT ACCEPTABLE.
2	307660 L/C #9004IMDEF0001111	01/14/11	U.A.E.	46A: DOCUMENTS REQUIRED... 4. MARINE INSURANCE POLICY/CERTIFICATE...POLICIES ISSUED BY COMPANIES WHOSE NAMES ARE INCLUDED IN ISRAELI BOYCOTT LIST ARE NOT ACCEPTABLE.

TABLE B

Schedule of Alleged Violations of Section 760.2(d)
**FURNISHING INFORMATION ABOUT BUSINESS RELATIONSHIPS
 WITH BOYCOTTED COUNTRIES OR BLACKLISTED PERSONS**

OXYDE CHEMICALS INC.
 Case No. 14-05

Item	Transaction File(s)	Document Furnished	Date of Furnishing	Boycotting Country	Information Furnished
1	306926 L/C #9004IMDEF0015310	MARINE INSURANCE CERTIFICATE	08/27/2010	U.A.E.	SOUTHERN MARINE & AVIATION IS NOT INCLUDED IN ISRAELI BOYCOTT LIST.
2	307637 L/C #LC11110029	SHIPPING CERTIFICATE	02/09/2011	LEBANON	WE HEREBY CERTIFY THAT THE CARRYING VESSEL NAMED MSC BENEDETTA IS ALLOWED TO ENTER LEBANON.
3	307660 L/C #9004IMDEF0001111	INSURANCE CERTIFICATE	03/04/2011	U.A.E.	INSURANCE COMPANY IS NOT INCLUDED IN ISRAELI BOYCOTT LIST.
4	307791 L/C #LC11110134	STEAMSHIP CERTIFICATE	03/09/2011	LEBANON	WE HEREBY CERTIFY THAT THE CARRYING VESSEL (MSC NATAL) IS ALLOWED TO ENTER LEBANON.

TABLE C

Schedule of Alleged Violations of Section 760.5
FAILURE TO REPORT RECEIPTS OF BOYCOTT REQUESTS

OXYDE CHEMICALS INC.
Case No. 14-05

Item	Transaction Reference/Letter of Credit #	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
1	306639 LC10110420	05/19/10	07/31/10	LEBANON	46A: DOCUMENTS REQUIRED... I. CERTIFICATE ISSUED BY THE CARRIER/MASTER OR THEIR AGENT CERTIFYING THAT THE VESSEL CARRYING THE GOODS UNDER THIS CREDIT IS ALLOWED BY ARAB AUTHORITIES TO CALL AT ARABIAN PORTS DURING ITS VOYAGE TO DESTINATION.
2	306728 10IS218394-225	06/07/10	07/31/10	LEBANON	46A: DOCUMENTS REQUIRED... H – A CERTIFICATE ISSUED BY THE SHIPPING COMPANY OR THEIR AGENT ATTESTING THAT THE VESSEL IS ELIGIBLE TO ENTER INTO THE ARABIAN PORTS.
3	306926 9004IMDEF0015310	08/02/10	10/31/10	U.A.E.	46A: DOCUMENTS REQUIRED... 4. MARINE INSURANCE POLICY/CERTIFICATE...POLICIES ISSUED BY COMPANIES WHOSE NAME ARE INCLUDED IN ISRAELI BOYCOTT LIST ARE NOT ACCEPTABLE.
4	307637 LC11110029	01/17/11	04/30/11	LEBANON	DOCUMENTS REQUIRED... I. CERTIFICATE ISSUED BY THE CARRIER/MASTER OR THEIR AGENT CERTIFYING THAT THE CARRYING VESSEL IS ALLOWED TO ENTER LEBANON.

* As provided in Section 760.5(b)(4)(i) of the 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.

TABLE C

Schedule of Alleged Violations of Section 760.5
FAILURE TO REPORT RECEIPTS OF BOYCOTT REQUESTS

OXYDE CHEMICALS INC.
Case No. 14-05

Item	Transaction Reference/Letter of Credit #	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
5	307660 9004IMDEF0001111	01/14/11	04/30/11	U.A.E.	46A: DOCUMENTS REQUIRED... 4. MARINE INSURANCE POLICY/CERTIFICATE...INSURANCE POLICIES ISSUED BY COMPANIES WHOSE NAMES ARE INCLUDED IN ISRAELI BOYCOTT LIST ARE NOT ACCEPTABLE.
6	307791 LC11110134	02/15/11	04/30/11	LEBANON	DOCUMENTS REQUIRED:... I. CERTIFICATE ISSUED BY THE CARRIER/MASTER OR THEIR AGENT CERTIFYING THAT THE CARRYING VESSEL IS ALLOWED TO ENTER LEBANON.
7	307915 ILC11/11/39883	04/25/11	07/31/11	U.A.E.	46B: DOCUMENTS REQUIRED... 7. CERTIFICATE ISSUED BY SHIPPING COMPANY OR THEIR REPRESENTATIVE CERTIFYING THAT:... (D) THE CARRYING VESSEL IS ALLOWED BY THE ARAB AUTHORITIES TO CALL AT ANY ARABIAN PORTS.
8	307930 LC11110241	04/01/11	07/31/11	LEBANON	DOCUMENTS REQUIRED:... I. CERTIFICATE ISSUED BY THE CARRIER/MASTER OR THEIR AGENT CERTIFYING THAT THE CARRYING VESSEL IS ALLOWED TO ENTER LEBANON.

* As provided in Section 760.5(b)(4)(i) of the 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.

TABLE C

Schedule of Alleged Violations of Section 760.5
FAILURE TO REPORT RECEIPTS OF BOYCOTT REQUESTS

OXYDE CHEMICALS INC.

Case No. 14-05

Item	Transaction Reference/Letter of Credit #	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
9	312687 118LC01133590004	12/26/13	01/31/14	LIBYA	46A: DOCUMENTS REQUIRED... 3 – A DECLARATION ON THE B/L ITSELF OR IN A SEPARATE DECLARATION STATING THAT THE VESSEL IS ALLOWED TO BERTH AT ANY LIBYAN PORT.
10	313077 ENBDLC14001931	03/10/14	04/30/14	U.A.E.	46A: DOCUMENTS REQUIRED... 6. CERTIFICATE FROM THE SHIPPING COMPANY OR OWNER/MASTER OF THE VESSEL OR THEIR AGENT CERTIFYING THAT THE CARRYING VESSEL A) IS ALLOWED TO ENTER THE PORTS OF ARAB STATES.
11	313138 ILC749018002	04/11/14	07/31/14	BAHRAIN	46A: DOCUMENTS REQUIRED... 6. CERTIFICATE FROM SHIPPING COMPANY OR THEIR AGENTS STATING THAT THE GOODS ARE SHIPPED ON CONFERENCE/REGULAR LINE VESSEL:... (III) THAT IS ALLOWED BY ARAB AUTHORITIES TO CALL AT ARABIAN PORTS...

* As provided in Section 760.5(b)(4)(i) of the 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.