

UNITED STATES OF AMERICA
DEPARTMENT OF COMMERCE

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In the Matter of)
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Zurn Industries, LLC)
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_____)

Case No. 15-05

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 the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2019)) (the “Regulations”),¹ against Zurn Industries, LLC (“Zurn”), a domestic concern, organized under the laws of the United States and doing business in the State of Pennsylvania, based on allegations set forth in the Proposed Charging Letter, dated October 23, 2018, that alleged that Zurn committed twenty-seven violations of the Regulations.

¹ The Regulations originally issued under the Export Administration Act of 1979, as amended, 50 U.S.C. §§ 4601-4623 (Supp. III 2015) (“the EAA”), which lapsed on August 21, 2001. The President, through Executive Order 13,222 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 8, 2018 (83 Fed. Reg. 39,871 (Aug. 13, 2018)), continued the Regulations in full force and effect under the International Emergency Economic Powers Act, 50 U.S.C. § 1701, *et seq.* (2012) (“IEEPA”). On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, Title XVII, Subtitle B of Pub. L. 115-232 (“ECRA”). The Anti-Boycott Act of 2018, Title XVII, Subtitle B, Part II of Pub. L. 115-232, is a subpart of ECRA. ECRA provides permanent authority for the Regulations. While Section 1766 of ECRA repeals the provisions of the EAA (except for three sections which are inapplicable here), Section 1768 of ECRA provides, in pertinent part, that all rules and regulations that were made or issued under the EAA, including as continued in effect pursuant to IEEPA, and were in effect as of ECRA’s date of enactment (August 13, 2018), shall continue in effect according to their terms until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA.

Specifically, the charges are:

1. *Twenty-seven 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 January 2011 through November 2014, Zurn engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to Qatar 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, Zurn, on twenty-seven 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. Zurn failed to report its receipts of these requests to the Department of Commerce, as directed by Section 760.5 of the Regulations.

BIS and Zurn 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 \$54,000 is assessed against Zurn 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.

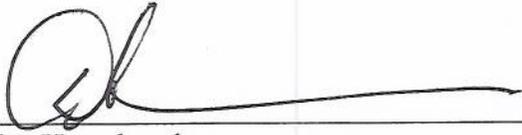
SECOND, pursuant to the Debt Collections Act of 1982, as amended (31 U.S.C. §§3701 – 3720E (1983 and Supp. 2001)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice and, if payment is not made by the due date specified herein, Zurn will be assessed, 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 \$54,000 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 Zurn.

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

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



Douglas Hassebrock
Director, Office of Export Enforcement
Performing the nonexclusive functions and duties of the
Assistant Secretary of Export Enforcement

Entered this 20th day of May, 2019

Attachments

UNITED STATES OF AMERICA
DEPARTMENT OF COMMERCE

In the Matter of
Zurn Industries, LLC

Case No. 15-05

SETTLEMENT AGREEMENT

This agreement is made by and between Zurn Industries, LLC (“Zurn”), a domestic concern, organized under the laws of the United States and doing business in the State of Pennsylvania, 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 (2019)) (the “Regulations”) issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. §§4601-4623 (Supp. III 2015)) (the “Act”)¹.

¹ The Regulations originally issued under the Export Administration Act of 1979, as amended, 50 U.S.C. §§ 4601-4623 (Supp. III 2015) (“the EAA”), which lapsed on August 21, 2001. The President, through Executive Order 13,222 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 8, 2018 (83 Fed. Reg. 39,871 (Aug. 13, 2018)), continued the Regulations in full force and effect under the International Emergency Economic Powers Act, 50 U.S.C. § 1701, *et seq.* (2012) (“IEEPA”). On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, Title XVII, Subtitle B of Pub. L. 115-232 (“ECRA”). The Anti-Boycott Act of 2018, Title XVII, Subtitle B, Part II of Pub. L. 115-232, is a subpart of ECRA. ECRA provides permanent authority for the Regulations. While Section 1766 of ECRA repeals the provisions of the EAA (except for three sections which are inapplicable here), Section 1768 of ECRA provides, in pertinent part, that all rules and regulations that were made or issued under the EAA, including as continued in effect pursuant to IEEPA, and were in effect as of ECRA’s date of enactment (August 13, 2018), shall continue in effect according to their terms until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA.

WHEREAS, BIS has notified Zurn of its intention to initiate an administrative proceeding against Zurn pursuant to the Act and the Regulations by issuing the Proposed Charging Letter dated October 23, 2018, a copy of which is attached hereto and incorporated herein by this reference; and

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

WHEREAS, Zurn 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, Zurn agrees to be bound by the appropriate Order (“Order”) when entered;

NOW THEREFORE, Zurn and BIS agree as follows:

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

2. BIS will impose a civil penalty in the amount of \$54,000. Zurn 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 \$54,000 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 Zurn. Failure to make payment of this amount shall result in the denial of all of Zurn'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, Zurn 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 Zurn 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 Zurn 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. Zurn 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 Zurn 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 Zurn 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 Zurn'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.

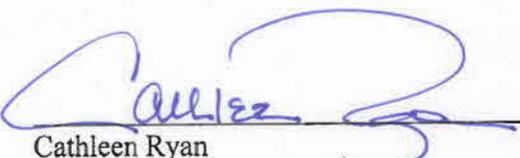
ZURN INDUSTRIES, LLC



Patty Whaley
VP, General Counsel and Secretary

DATE: 5/8/19

U.S. DEPARTMENT OF COMMERCE



Cathleen Ryan
Director
Office of Antiboycott Compliance

DATE: 15 MAY 2019

Attachment



PROPOSED CHARGING LETTER

October 23, 2018

Zurn Industries, LLC
1801 Pittsburgh Avenue
Erie, PA 16502

Attention: Patricia Whaley, Esq.
Vice President, General Counsel
& Secretary

Case No. 15-05

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, Zurn Industries, LLC, on twenty-seven occasions, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2018)) (the "Regulations")¹.

We charge that you committed twenty-seven violations of Section 760.5 of the Regulations, in that, on twenty-seven 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 2011 through 2015. The Regulations governing the violations at issue are found in the 2011 through 2015 versions of the Code of Federal Regulations (15 C.F.R. Parts 730 – 774 (2011 through 2015)). The 2018 Regulations currently govern the procedural aspects of this matter.

The Regulations originally issued under the Export Administration Act of 1979, as amended, 50 U.S.C. §§ 4601-4623 (Supp. III 2015) ("the EAA"), which lapsed on August 21, 2001. The President, through Executive Order 13,222 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 8, 2018 (83 Fed. Reg. 39,871 (Aug. 13, 2018)), continued the Regulations in full force and effect under the International Emergency Economic Powers Act, 50 U.S.C. § 1701, *et seq.* (2012) ("IEEPA"). On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, Title XVII, Subtitle B of Pub. L. 115-232 ("ECRA"). The Anti-Boycott Act of 2018, Title XVII, Subtitle B, Part II of Pub. L. 115-232, is a subpart of ECRA. ECRA provides permanent authority for the Regulations. While Section 1766 of ECRA repeals the provisions of the EAA (except for three sections which are inapplicable here), Section 1768 of ECRA provides, in pertinent part, that all rules and regulations that were made or issued under the EAA, including as continued in effect pursuant to IEEPA, and were in effect as of ECRA's date of enactment (August 13, 2018), shall continue in effect according to their terms until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA.



We allege that:

You, Zurn Industries, LLC, 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 Pennsylvania. As such, you are a United States person, as defined in Section 760.1(b) of the Regulations.

During the period January 2011 through November 2014, you engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to Qatar 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 - 27 (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 January 2011 through November 2014, on twenty-seven occasions, as described in Table A, which is attached and incorporated herein by this reference, you received a request, 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 A, as directed by Section 760.5 of the Regulations, you are in violation of Section 760.5. We therefore charge you with twenty-seven 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.^{2, 3}

² The alleged violations occurred prior to August 13, 2018, the date of enactment of the ECRA. Consequently, the potential sanctions are provided for in the International Emergency Economic Powers Act.

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

- a. A maximum civil penalty of the greater of \$ 295,141 per violation or twice the value of the transaction that is the basis of the violation (see 15 C.F.R. §6.3(b)(4), 6.4 and 83 Fed. Reg. 706, 707 (January 8, 2018)). 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).
- d. Any other liability, sanction, or penalty available under law.

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. You are entitled to be represented by counsel or other authorized representative who has power of attorney to represent you. See Sections 766.3(a) and 766.4 of the Regulations. You may also seek settlement without a hearing. See Section 766.18 of the Regulations.

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, we are 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:

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

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

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

ZURN INDUSTRIES, LLC

Case No. 15-05

Item #	File Reference #	Letter of Credit #	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
1	4831407; 4821066; 4825922; 4827586; 4827590; 4826024	ILC31/11/39220	1/12/2011	4/30/2011	U.A.E.	Documents Required... 6. Certificate issued by carrier/master/shipping company or their representative certifying that:...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates.
2	17480; 17488; 17475; 17476; 17451; 17426	ILC31/11/39370	1/25/2011	4/30/2011	U.A.E.	Documents Required... 6. Certificate issued by carrier/master/shipping company or their representative certifying that:...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates.
3	4929536	ILC31/11/40338	4/15/2011	7/31/2011	U.A.E.	46A: Documents Required... 6. Certificate issued by carrier/master/shipping company or their representative certifying that:...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates.
4	04999435	ILCCBQ045772/11	7/3/2011	10/31/2011	Qatar	46A: Documents Required... 5) A certificate from owner, agent or captain of the carrying vessel showing its name, flag and nationality also confirming that it is allowed by Qatar authorities to call at Qatar ports by honouring Qatar laws and regulations during its present voyage to destination port

* 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.

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

ZURN INDUSTRIES, LLC
Case No. 15-05

Item #	File Reference #	Letter of Credit #	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
5	05148557	ILC31/11/42046	9/12/2011	10/31/2011	U.A.E.	46A: Documents Required... 6. Certificate issued by carrier/master/shipping company or their representative certifying that:...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates.
6	10008505	ILC31/11/43182	12/21/2011	1/31/2012	U.A.E.	46A: Documents Required... 6. Certificate issued by carrier/master/shipping company or their representative certifying that:...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates.
7	10024611	ILCCBQ047160/12	1/18/2012	4/30/2012	Qatar	46A: Documents req'd... 5.A certificate from carrier or agent of the carrying vessel showing its name, flag and nationality also confirming that it is allowed permitted to enter Arab ports.
8	05236132	ILCCBQ047119/12	1/18/2012	4/30/2012	Qatar	46A: (Documents reqd)... 5) A certificate from carrier or agent of the carrying vessel showing its name, flag and nationality also confirming that it is allowed permitted to enter Arab 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.

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

ZURN INDUSTRIES, LLC

Case No. 15-05

Item #	File Reference #	Letter of Credit #	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
9	10058895; 10063605; 10075821	ILCCBQ047532/12	2/27/2012	4/30/2012	Qatar	46A: (Documents reqd)... 5. A certificate from carrier or agent of the carrying vessel showing its name, flag and nationality also confirming that it is allowed permitted to enter Arab ports.
10	10137239	ILCCBQ047728/12	3/26/2012	4/30/2012	Qatar	46A: (Documents reqd)... 5. A certificate from carrier or agent of the carrying vessel showing its name, flag and nationality also confirming that it is allowed permitted to enter Arab ports.
11	10088917; 10105949	ILCCBQ047797/12	3/29/2012	4/30/2012	Qatar	46A: (Documents reqd)... 5. A certificate from carrier or agent of the carrying vessel showing its name, flag and nationality also confirming that it is allowed permitted to enter Arab ports.
12	10244265	ILC31/12/45284	6/12/2012	7/31/2012	U.A.E.	46A: Documents Required... 6. Certificate issued by carrier/master/shipping company or their representative certifying that:...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates.
13	10274184; 10274298; 10243733	ILCCBQ048740/12	7/6/2012	10/31/2012	Qatar	46A: (Documents reqd)... 4(B). A certificate from carrier or agent of the carrying vessel showing its name, flag and nationality also confirming that the vessel is permitted to enter Arab 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.

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

ZURN INDUSTRIES, LLC
Case No. 15-05

Item #	File Reference #	Letter of Credit #	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
14	10357348	ILC31/12/46058	8/27/2012	10/31/2012	U.A.E.	46A: Documents Required... 6. Certificate issued by carrier/master/shipping company or their representative certifying that:...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates.
15	10377367	ILC31/12/46333	9/20/2012	10/31/2012	U.A.E.	46A: Documents Required... 6. Certificate issued by carrier/master/shipping company or their representative certifying that:...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates.
16	10650054	ILC31/13/48998	4/18/2013	7/31/2013	U.A.E.	46A: Documents Required... 6. Certificate issued by carrier/master/shipping company or their representative certifying that:...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates.
17	10655521; 10617824	ILCCBQ051800/13	5/21/2013	7/31/2013	Qatar	46A: (Documents reqd)... 4(B). A certificate from carrier or agent of the carrying vessel showing its name, flag and nationality also confirming that the vessel is permitted to enter Arab 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.

TABLE A

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

ZURN INDUSTRIES, LLC

Case No. 15-05

Item #	File Reference #	Letter of Credit #	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
18	10706139; 10775362; 10804252; 10775320; 10818986; 10828018; 10825727; 10799145	ILC31/13/50529	8/30/2013	10/31/2013	U.A.E.	46A: Documents Required... 6. Certificate issued by carrier/master/shipping company or their representative certifying that:...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates.
19	10824348	ILCCBQ053474/13	10/20/2013	1/31/2014	Qatar	46A: (Documents reqd)... 5. A certificate from carrier or agent of the carrying vessel showing its name, flag and nationality also confirming that the vessel is permitted to enter Arab ports.
20	10846412	ILCCBQ053475/13	10/21/2013	1/31/2014	Qatar	46A: (Documents reqd)... 5. A certificate from carrier or agent of the carrying vessel showing its name, flag and nationality also confirming that the vessel is permitted to enter Arab ports.
21	10867762	ILC31/13/51136	10/30/2013	1/31/2014	U.A.E.	46A: Documents Required... 6. Certificate issued by carrier/master/shipping company or their representative certifying that:...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates.

* 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.

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

ZURN INDUSTRIES, LLC
Case No. 15-05

Item #	File Reference #	Letter of Credit #	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
22	10837633	ILCCBQ053718/13	11/18/2013	1/31/2014	Qatar	46A: (Documents reqd)... 5. A certificate from carrier or agent of the carrying vessel showing its name, flag and nationality also confirming that the vessel is permitted to enter Arab ports.
23	10890082; 10881368; 10892743	ILCCBQ053821/13	11/25/2013	1/31/2014	Qatar	46A: (Documents reqd)... 5. A certificate from carrier or agent of the carrying vessel showing its name, flag and nationality also confirming that the vessel is permitted to enter Arab ports.
24	10911396; 10910136; 10911888; 10910716	ILCQIB135832013	12/19/2013	1/31/2014	Qatar	46A: (Documents reqd)... 8. Certificate from the owner, carrier or captain of the carrying vessel or their agent showing its name, flag and nationality is permitted to enter Arab ports.
25	10976703	ILC31/14/52504	2/24/2014	4/30/2014	U.A.E.	46A: Documents Required... 7. Certificate issued by carrier/master/shipping company or their representative certifying that...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates.

* 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.

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

ZURN INDUSTRIES, LLC
Case No. 15-05

Item #	File Reference #	Letter of Credit #	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
26	11073982	ILC31/14/53492	4/30/2014	7/31/2014	U.A.E.	46A: Documents Required... 7. Certificate issued by carrier/master/shipping company or their representative certifying that:...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates.
27	11449115	ILC31/14/55574	11/5/2014	1/31/2015	U.A.E.	46A: Documents Required... 7. Certificate issued by carrier/master/shipping company or their representative certifying that:...(D) the carrying vessel is allowed by Arab authorities to call at Arabian ports during its voyage to the United Arab Emirates

* 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.