

UNITED STATES OF AMERICA
DEPARTMENT OF COMMERCE

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In the Matter of)
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M-I Production Chemicals (ME) FZE
(United Arab Emirates)
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Case No. 05-23

ORDER

The Office of Antiboycott Compliance, Bureau of Industry and Security, U.S. Department of Commerce ("BIS"), having determined to initiate an administrative proceeding pursuant to Section 11(c) of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (the "Act")¹ and the Export Administration Regulations (currently codified at 15 C.F.R Parts 730-774 (2009)) (the "Regulations"), against M-I Production Chemicals (ME) FZE (United Arab Emirates) ("MIPC"), a controlled-in-fact foreign affiliate of M-I LLC, a domestic concern incorporated in Delaware, based on allegations set forth in the Proposed Charging Letter, dated May 13, 2009, that alleged that MIPC committed twenty 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 13, 2009 (74 Fed. Reg. 41,325 (August 14, 2009)), 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. *Ten Violations of 15 C.F.R. §760.2(d) - Furnishing Information about*

Business Relationships with Boycotted Countries or Blacklisted Persons:

During the period 2004 through 2005, MIPC engaged in transaction(s) involving the sale and/or transfer of goods or services (including information) from the United States to Syria, 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 ten occasions, MIPC, with intent to comply with, further or support an unsanctioned foreign boycott, furnished information concerning its or another person's business relationships with or in a boycotted country or with another person 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.

2. *Five Violations of 15 C.F.R. §760.2(a) - Refusal to do Business:*

During the period 2004 through 2005, MIPC engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to Syria, 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 five occasions, MIPC, knowingly agreed to refuse to do business with another person pursuant to an agreement with, a requirement of or a request from a boycotting country, an activity prohibited by Section 760.2(a) of the Regulations, and not excepted.

3. *Five Violation 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 2004 through 2005, MIPC engaged in transaction(s) involving the sale and/or transfer of goods or services (including information) from the United States to Syria, 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, MIPC on five 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. MIPC failed to report its receipts of these requests to the Department of Commerce, as required by Section 760.5 of the Regulations.

BIS and MIPC having 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 having been approved by me;

IT IS THEREFORE ORDERED THAT:

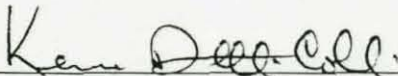
FIRST, a civil penalty of \$44,625 is assessed against MIPC and shall be paid to the U.S. Department of Commerce within 30 days from the date of entry of this Order. Payment of this sum shall be made in the manner specified in the attached instructions.

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, MIPC 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 \$44,625 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 MIPC. Accordingly, if MIPC should fail to pay the civil penalty in a timely manner, the undersigned may enter an Order denying all of MIPC'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 MIPC.

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


Kevin Delli-Colli
Acting Assistant Secretary of Commerce
for Export Enforcement

Entered this 30th day of September, 2009

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: James Vidale

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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M-I Production Chemicals (ME)FZE)
(United Arab Emirates))
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Case No. 05-23

SETTLEMENT AGREEMENT

This agreement is made by and between M-I Production Chemicals (ME) FZE ("MIPC"), a controlled-in-fact foreign affiliate of M-I LLC, a domestic concern incorporated in Delaware, 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 (2009)) (the "Regulations"), issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 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 13, 2009 (74 Fed. Reg. 41,325 (August 14, 2009)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707 (2000)).

WHEREAS, MIPC has voluntarily disclosed certain information concerning its activities to BIS; and

WHEREAS, BIS has notified MIPC of its intention to initiate an administrative proceeding against MIPC, pursuant to the Act and the Regulations by issuing the Proposed Charging Letter dated May 13, 2009, a copy of which is attached hereto and incorporated herein by this reference; and

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

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

NOW, THEREFORE, MIPC and BIS agree as follows:

1. Under the Act and the Regulations, BIS has jurisdiction over MIPC with respect to the matters alleged in the Proposed Charging Letter.
2. BIS will impose a civil penalty in the amount of \$44,625. MIPC 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 \$44,625 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 MIPC. Failure to make payment of this amount shall result in the denial of all of MIPC's export privileges for a period of one year from the date of entry of the Order.

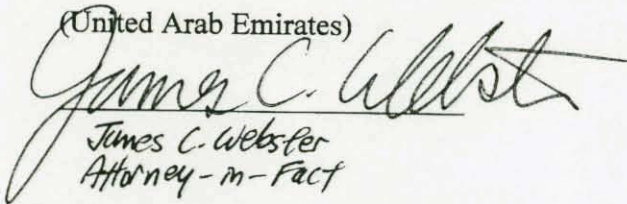
4. Subject to the approval of this Settlement Agreement, pursuant to paragraph 9 hereof, MIPC hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violation of this Settlement Agreement or the Order, when entered) including, without limitation, any right to:
 - A. An administrative hearing regarding the allegations in the Proposed Charging Letter;
 - B. Request a refund of the funds paid by MIPC 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 MIPC 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. MIPC 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 MIPC 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 MIPC 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 MIPC'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.

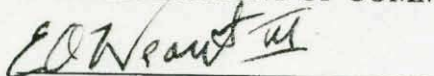
M-I Production Chemicals (ME) FZE

(United Arab Emirates)


James C. Webster
Attorney-in-Fact

DATE: September 29, 2009

U.S. DEPARTMENT OF COMMERCE



DATE: 9-30-09

Edward O. Weant III
Director
Office of Antiboycott Compliance

Attachment



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

PROPOSED CHARGING LETTER

May 13, 2009

M-I Production Chemicals (ME) FZE
Plot No. WWA142, Roundabout 11
Jebel Ali Free Zone
P.O. Box 17120 Jebel Ali
Dubai
United Arab Emirates

Case No. 05-23

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, M-I Production Chemicals (ME) FZE (United Arab Emirates) ("MIPC"), on twenty occasions, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2008)) (the "Regulations"),¹ which are issued under the authority of the Export Administration Act of 1979, as amended (50 U.S.C. §§ 2401-2420 (2000)) (the "Act").²

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

We also charge that you committed five violations of Section 760.2(a) of the Regulations, in that, on five 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 a boycotting country.

¹ The alleged violations occurred during the period 2004 through 2005. Regulations governing the violations at issue are found in the 2004 and 2005 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2004 and 2005)). The prior years' Regulations are substantially the same as the 2008 version of the Regulations which govern 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 July 23, 2008 (73 Fed. Reg. 43603 (July 25, 2008)), continues the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1706 (2000)).



Lastly, we charge that you committed five violations of Section 760.5 in that, on five 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:

Smith International Inc. ("Smith") is, and at all times relevant was, a domestic concern incorporated in the State of Delaware and, as such, is a United States person as defined in Section 760.1(b) of the Regulations.

M-I LLC is and at all times relevant was, a domestic concern, incorporated in the State of Delaware and majority owned by Smith; as such, M-I LLC is a United States person as defined in Section 760.1(b) of the Regulations.

You, MIPC, are, and at all times relevant were, a company registered under the laws of the United Arab Emirates, indirectly majority owned by Smith, and controlled-in-fact by M-I LLC. Accordingly, you are a controlled-in-fact foreign affiliate of a domestic concern, as defined in Section 760.1(c) of the Regulations, and, as such, are a United States person as defined in Section 760.1(b) of the Regulations.

During the period 2004 through 2005, you engaged in transactions involving the sale and transfer of goods from the United States to Syria, activities in the interstate or foreign commerce of the United States, as defined in Section 760.1(d) of the Regulations.

Charges 1 - 10 (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, on ten occasions, you furnished to persons in Syria, information, as described in Table A, which is attached and incorporated herein by this reference, concerning your or another person's business relationships with or in a boycotted country or with another person known or believed to be restricted from having any business relationship with or in a boycotting country. Providing the information described in Table A, 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 ten violations of Section 760.2(d).

Charges 11 - 15 (15 C.F.R. § 760.2(a) - Refusal to do Business)

In connection with the activities referred to above, on five occasions, you, as described in Table B, which is attached and incorporated herein by this reference, knowingly agreed to refuse to do

business with another person pursuant to an agreement with, a requirement of, or a request from a boycotting country. Agreeing to the conditions described in Table B with intent to comply with, further or support an unsanctioned foreign boycott is an activity prohibited by Section 760.2(a) of the Regulations, and not excepted. We, therefore, charge you with five violations of Section 760.2(a).

Charges 16 -20 (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 2004 through 2005, on five occasions, you received a request 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 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.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. You are entitled to be represented by counsel, and under Section 766.18 of the Regulations, to seek a settlement agreement.

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

³ 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).

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

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:

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,

Edward O. Weant, III
Director
Office of Antiboycott Compliance

Enclosures

Table A
M-I Production Chemicals (ME) FZE (United Arab Emirates)
Case No. 05-23
Schedule of Alleged Violations of Section 760.2(d), Furnishing Prohibited Information

Item	Document Furnished/ Order No.	Date Furnished on or about	<u>To</u>	Information Furnished
1	COMMERCIAL INVOICE JA1 1307A	7-5-04	Syria	... WE ALSO DECLARE THAT NO ISRAELI RAW MATERIALS HAVE BEEN USED EITHER IN THE PREPARATION OR THE MANUFACTURING OF THE GOODS MENTIONED ON THIS INVOICE + WE DECLARE FURTHER THAT THE GOODS MENTIONED ON THIS INVOICE HAS [SIC] NEITHER BEEN EXPORTED DIRECTLY FROM ISRAEL NOR MANUFACTURED BY USE OF ANY ISRAELI RAW MATERIAL IMPORTED FROM ISRAEL.
2	COMMERCIAL INVOICE JA1 1307B	7-5-04	Syria	... WE ALSO DECLARE THAT NO ISRAELI RAW MATERIALS HAVE BEEN USED EITHER IN THE PREPARATION OR THE MANUFACTURING OF THE GOODS MENTIONED ON THIS INVOICE + WE DECLARE FURTHER THAT THE GOODS MENTIONED ON THIS INVOICE HAS [SIC] NEITHER BEEN EXPORTED DIRECTLY FROM ISRAEL NOR MANUFACTURED BY USE OF ANY ISRAELI RAW MATERIAL IMPORTED FROM ISRAEL.
3	COMMERCIAL INVOICE JAK 1324	8-4-04	Syria	... WE ALSO DECLARE THAT NO ISRAELI RAW MATERIALS HAVE BEEN USED EITHER IN THE PREPARATION OR THE MANUFACTURING OF THE GOODS MENTIONED ON THIS INVOICE + WE DECLARE FURTHER THAT THE GOODS MENTIONED ON THIS INVOICE HAS [SIC] NEITHER BEEN EXPORTED DIRECTLY FROM ISRAEL NOR MANUFACTURED BY USE OF ANY ISRAELI RAW MATERIAL IMPORTED FROM ISRAEL.

4	COMMERCIAL INVOICE JAK 1339	9-7-04	Syria	... WE ALSO DECLARE THAT NO ISRAELI RAW MATERIALS HAVE BEEN USED EITHER IN THE PREPARATION OR THE MANUFACTURING OF THE GOODS MENTIONED ON THIS INVOICE + WE DECLARE FURTHER THAT THE GOODS MENTIONED ON THIS INVOICE HAS [SIC] NEITHER BEEN EXPORTED DIRECTLY FROM ISRAEL NOR MANUFACTURED BY USE OF ANY ISRAELI RAW MATERIAL IMPORTED FROM ISRAEL.
5	COMMERCIAL INVOICE JAK 1348	9-20-04	Syria	... WE ALSO DECLARE THAT NO ISRAELI RAW MATERIALS HAVE BEEN USED EITHER IN THE PREPARATION OR THE MANUFACTURING OF THE GOODS MENTIONED ON THIS INVOICE + WE DECLARE FURTHER THAT THE GOODS MENTIONED ON THIS INVOICE HAS [SIC] NEITHER BEEN EXPORTED DIRECTLY FROM ISRAEL NOR MANUFACTURED BY USE OF ANY ISRAELI RAW MATERIAL IMPORTED FROM ISRAEL.
6	CERTIFICATE	7-1-04	Syria	WE CERTIFY THAT VESSEL IS ...NOT BLACK LISTED ...
7	CERTIFICATE	7-1-04	Syria	WE CERTIFY THAT VESSEL IS ...NOT BLACK LISTED ...
8	CERTIFICATE	8-4-04	Syria	WE CERTIFY THAT VESSEL IS ...NOT BLACK LISTED ...
9	CERTIFICATE	9-11-04	Syria	WE CERTIFY THAT VESSEL IS ...NOT BLACK LISTED ...
10	CERTIFICATE	9-23-04	Syria	WE CERTIFY THAT VESSEL IS ...NOT BLACK LISTED ...

Table B
M-I Production Chemicals (ME) FZE (United Arab Emirates)
Case No. 05-23
Schedule of Alleged Violations of Section 760.2(a), Refusal to Do Business

Item	Document/ Order No.	Date	Boycotting Country	Agreement
1	COMMERCIAL INVOICE JA1 1307A	7-5-04	Syria	WE CERTIFY THAT . . . WE UNDERTAKE NOT TO SHIP THE GOODS DESCRIBED IN THIS INVOICE ON ISRAELI VESSEL OR THOSE MENTIONED IN THE BLACK LIST OF ARAB COUNTRIES OR ON VESSEL CALLING AT ANY ISRAELI PORT.
2	COMMERCIAL INVOICE JA1 1307B	7-5-04	Syria	WE CERTIFY THAT . . . WE UNDERTAKE NOT TO SHIP THE GOODS DESCRIBED IN THIS INVOICE ON ISRAELI VESSEL OR THOSE MENTIONED IN THE BLACK LIST OF ARAB COUNTRIES OR ON VESSEL CALLING AT ANY ISRAELI PORT.
3	COMMERCIAL INVOICE JAK 1324	8-4-04	Syria	WE CERTIFY THAT . . . WE UNDERTAKE NOT TO SHIP THE GOODS DESCRIBED IN THIS INVOICE ON ISRAELI VESSEL OR THOSE MENTIONED IN THE BLACK LIST OF ARAB COUNTRIES OR ON VESSEL CALLING AT ANY ISRAELI PORT.
4	COMMERCIAL INVOICE JAK 1339	9-7-04	Syria	WE CERTIFY THAT . . . WE UNDERTAKE NOT TO SHIP THE GOODS DESCRIBED IN THIS INVOICE ON ISRAELI VESSEL OR THOSE MENTIONED IN THE BLACK LIST OF ARAB COUNTRIES OR ON VESSEL CALLING AT ANY ISRAELI PORT.
5	COMMERCIAL INVOICE JAK 1348	9-20-04	Syria	WE CERTIFY THAT . . . WE UNDERTAKE NOT TO SHIP THE GOODS DESCRIBED IN THIS INVOICE ON ISRAELI VESSEL OR THOSE MENTIONED IN THE BLACK LIST OF ARAB COUNTRIES OR ON VESSEL CALLING AT ANY ISRAELI PORT.

Table C
M-I Production Chemicals (ME) FZE (United Arab Emirates)
Case No. 05-23

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

Item	Document/ Order No.	Date Received on or about	Boycotting Country	Boycott Request
1	Documentary Credit Number 04IS69955- 300	6-7-04	Syria	<p>46A: Documents Required: A- COMMERCIAL INVOICE IN 6 COPIES DULY SIGNED BY BENEFICIARIES AND BEARING THE FOLLOWING CLAUSES: . . . WE UNDERTAKE NOT TO SHIP THE GOODS DESCRIBED IN THIS INVOICE ON ISRAELI VESSEL OR THOSE MENTIONED IN THE BLACKLIST OF ARAB COUNTRIES OR ON VESSEL CALLING AT ANY ISRAELI PORT . . . WE ALSO DECLARE THAT NO ISRAELI RAW MATERIALS HAVE BEEN USED EITHER IN THE PREPARATION OR THE MANUFACTURING OF THE GOODS MENTIONED ON THIS INVOICE + WE DECLARE FURTHER THAT THE GOODS MENTIONED ON THIS INVOICE HAS [SIC] NEITHER BEEN EXPORTED DIRECTLY FROM ISRAEL NOR MANUFACTURED BY USE OF ANY ISRAELI RAW MATERIALS IMPORTED FROM ISRAEL.</p> <p>B: FULL SET OF OCEAN/MARINE CLEAN ON BOARD B/L . . . BEARING THE FOLLOWING CLAUSE WE CERTIFY THAT VESSEL IS NOT OWNED BY ANY ISRAELI COMPANY OR PERSON IS NOT BLACK LISTED AND NOT CALLING AT ANY ISRAELI PORT THIS DECLARATION CAN BE MADE ON A SEPARATE CERTIFICATE DULY SIGNED BY THE SHIPPING COMPANY OR THEIR AGENT</p>
2	Tender Book Number 89/4/10090	2-3-05	Syria	(F) Certificate issued by the owner or agent or master of the vessel carrying the goods attesting that his vessel is not calling to any Israeli port during this shipment, and is not banned entry to Syrian ports for any reason whatsoever according to Syrian laws and regulations.

3	Tender Book Number 89/4/95240	12-19-04	Syria	(F) Certificate issued by the owner or agent or master of the vessel carrying the goods attesting that his vessel is not calling to any Israeli port during this shipment, and is not banned entry to Syrian ports for any reason whatsoever according to Syrian laws and regulations.
4	Tender Book Number 89/5/10020	5-9-05	Syria	F) Certificate issued by the owner or agent or master of the vessel carrying the goods attesting that his vessel is not calling to any Israeli port during this shipment, and is not banned entry to Syrian ports for any reason whatsoever according to Syrian laws and regulations.
5	Tender Book Number 89/5/91570	6-30-05	Syria	(F) Certificate issued by the owner or agent or master of the vessel carrying the goods attesting that his vessel is not calling to any Israeli port during this shipment, and is not banned entry to Syrian ports for any reason whatsoever according to Syrian laws and regulations.