



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

WARNING LETTER

29 September 2017

Phillips Specialty Products Inc.
1300 Plaza Office Building
Bartlesville, OK 74004

Case No. 16.01

Gentlemen/Ladies:

We, the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce, following our examination of certain export records of Phillips Specialty Products Inc. (“Phillips”), have reason to believe that you, Phillips, 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, in that, on one occasion, 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.

Specifically, on or about 14 March 2013, in connection with the sale and/or transfer of goods or services (including information) from the United States to Libya, you furnished to Letter of Credit Advising Bank a Shipping Certificate, which had the following certification affixed thereon:

**WE HEREBY STATE THAT THE CARRYING VESSEL IS ALLOWED TO
ENTER LIBYAN PORTS.**

Section 760.2(d) of the Regulations prohibits providing such information.

¹The alleged violation occurred during the year 2013. The regulations governing the violation at issue are found in the 2013 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2013)).

²Since 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)).



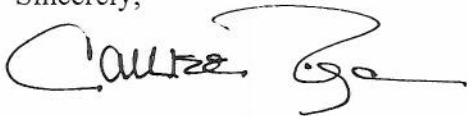
All United States persons are required to comply with the Regulations. However, having considered all the facts and circumstances known to us at this time, including specifically the fact that you discovered the violation yourself and voluntarily disclosed the violation to us, we are closing this investigation with the issuance of this Warning Letter.

This warning letter applies only to the transactions referred to herein. Other violations of the Regulations not expressly referred to in this Warning Letter may result in the institution of administrative proceedings against you, which could result in the imposition of civil penalties and/or any of the other sanctions set forth in Section 764.3 of the Regulations. You should, therefore, ensure that Phillips Specialty Products Inc. strictly adheres to the Regulations in all future transactions.

Warning letters are made available for public inspection in the Freedom of Information Reading Room section displayed on the Bureau of Industry and Security web site at <http://efoia.bis.doc.gov>.

Should you have any questions or comments relating to this Warning Letter, please contact me at 202-482-2381.

Sincerely,

A handwritten signature in black ink, appearing to read "Cathleen Ryan", with a stylized flourish extending to the right.

Cathleen Ryan
Director
Office of Antiboycott Compliance