



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

**WARNING LETTER**

August 1, 2018

VWR International, LLC  
One Radnor Corporate Center  
Building One  
Suite 200  
100 Matsonford Road  
Radnor, PA 19087

Attention: Amy McDonald,  
Vice President &  
Assistant General Counsel

Case No. 18-04

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 VWR International, LLC ("VWR"), have reason to believe that you, VWR, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2018)) (the "Regulations")<sup>1</sup>, which are issued under the authority of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§2401-2420 (2000)) (the "Act")<sup>2</sup>, in that, on one occasion, you furnished information concerning your business relationships with or in a boycotted country, with a business concern organized under the laws of a boycotting country, or with a national or resident of a boycotted country.

Specifically, on or about October 12, 2016, in connection with the sale and/or transfer of goods or services (including information) from the United States to Qatar, you furnished to your sub-distributor an e-mail, which had the following certification contained therein:

ALL ITEMS ON THIS QUOTATION ARE US ORIGIN PRODUCTS. NONE ARE  
MADE IN ISRAEL.

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<sup>1</sup> The alleged violations occurred during the years 2016 and 2017. The Regulations governing the violations at issue are found in the 2016 and 2017 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2016 and 2017)). The prior years' Regulations are substantially the same as the 2018 version of the Regulations which govern the procedural aspects of this matter.

<sup>2</sup> Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent 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. (2000)).



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

In addition, on one occasion, 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.

Specifically, on or about October 12, 2016, in connection with the sale and/or transfer of goods or services (including information) from the United States to Qatar, you received an e-mail from your sub-distributor in Qatar. The e-mail set out a request to take an action which would have the effect of furthering or supporting a restrictive trade practice or boycott. The request read as follows:

WITH REFERENCE TO YOUR BELOW CONFIRMATION, IN ADDITION  
PLEASE GUARANTEE THAT THE ITEM IS NOT MADE IN ISRAEL.

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 receipt of this request.

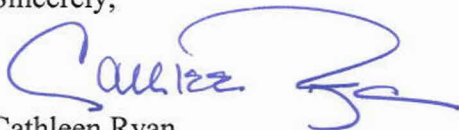
All United States persons are required to comply with the Regulations. However, having considered all the facts and circumstances known to us at this time, including specifically the fact that you discovered the violations yourself and voluntarily disclosed them to us, we are closing this investigation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

This Warning Letter applies only to the transaction 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 VWR 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,



Cathleen Ryan  
Director  
Office of Antiboycott Compliance