

UNITED STATES OF AMERICA
DEPARTMENT OF COMMERCE

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In the Matter of)
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Digi-Key Corporation)
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Case No. 13.01

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 Parts 730-774 (2013)) (the “Regulations”), against Digi-Key Corporation (“Digi-Key”), a domestic concern, organized under the laws of the United States and doing business in the State of Minnesota, based on allegations set forth in the Proposed Charging Letter, dated 29 April 2013, that alleged that Digi-Key committed sixty-three 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 of which was August 15, 2012 (77 Fed. Reg. 49699 (August 16, 2012)), 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. *Five Violations of 15 C.F.R. §760.2(d) - Furnishing Information about Business Relationships with Boycotted Countries or Blacklisted Persons*

During the period 2008 through 2011, Digi-Key engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to the United Arab Emirates and Malaysia, 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, Digi-Key, 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, with a business concern organized under the laws of boycotted country, or with a national or resident of a boycotted country, an activity prohibited by Section 760.2(d) of the Regulations, and not excepted.

2. *Fifty-Eight 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 2008 through 2011, Digi-Key engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to the United Arab Emirates and Malaysia, 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, Digi-Key, on fifty-eight 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. Digi-Key failed to report its receipts of these requests to the Department of Commerce, as directed by Section 760.5 of the Regulations.

BIS and Digi-Key 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 \$ 56,600 is assessed against Digi-Key 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, Digi-Key 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 \$ 56,600 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 Digi-Key.

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

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

A handwritten signature in black ink, appearing to read 'D. W. Mills', written over a horizontal line.

David W. Mills
Assistant Secretary of Commerce for
Export Enforcement

Entered this 13th day of September, 2013

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: Francine Dodson

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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Digi-Key Corporation)
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Case No. 13.01

SETTLEMENT AGREEMENT

This agreement is made by and between Digi-Key Corporation (“Digi-Key”), a domestic concern, organized under the laws of the United States and doing business in the State of Minnesota, 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 (2013)) (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 of which was August 15, 2012 (77 Fed. Reg. 49699 (August 16, 2012)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707 (2000)).

WHEREAS, Digi-Key has voluntarily disclosed information concerning certain of its transactions to BIS; and

WHEREAS, BIS has notified Digi-Key of its intention to initiate an administrative proceeding against Digi-Key pursuant to the Act and the Regulations by issuing the Proposed Charging Letter dated 29 April 2013, a copy of which is attached hereto and incorporated herein by this reference; and

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

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

NOW, THEREFORE, Digi-Key and BIS agree as follows:

1. Under the Act and the Regulations, BIS has jurisdiction over Digi-Key with respect to the matters alleged in the Proposed Charging Letter.
2. BIS will impose a civil penalty in the amount of \$ 56,600. Digi-Key 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 \$ 56,600 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 Digi-Key.

Failure to make payment of this amount shall result in the denial of all of Digi-Key'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, Digi-Key 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 Digi-Key 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 Digi-Key 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. Digi-Key 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 Digi-Key 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 Digi-Key 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 Digi-Key'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.

DIGI-KEY CORPORATION

Lorae Wendlandt DATE: 21 august 2013
VP Corporate Initiatives / Compliance Officer

U.S. DEPARTMENT OF COMMERCE

E O Weant III
Edward O. Weant III
Director
Office of Antiboycott Compliance

DATE: Sept. 11, 2013

Attachment



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

PROPOSED CHARGING LETTER

29 April 2013

Digi-Key Corporation
701 Brooks Avenue South
Thief River Falls, MN 56701

Case No. 13.01

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, Digi-Key Corporation, on sixty-three occasions, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2013)) (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 five violations of Section 760.2(d) of the Regulations, in that, on five occasions, with intent to comply with, further or support an unsanctioned foreign boycott, you furnished information concerning your or another person's past, present or proposed business relationships with or in a boycotted country, with a business concern organized under the laws of a boycotted country, or with a national or resident of a boycotted country.

We also charge that you committed fifty-eight violations of Section 760.5 of the Regulations, in that, on fifty-eight 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.

¹ The transactions and violations alleged occurred during the years 2008 through 2011. The Regulations governing the violations at issue are found in the 2008 through 2011 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2008, 2009, 2010 and 2011)). The prior years' Regulations are substantially the same as the 2013 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 of which was August 15, 2012 (77 Fed. Reg. 49699 (August 16, 2012)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707 (2000)).



We allege that:

You, Digi-Key Corporation, 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 Minnesota; as such, you are a United States person, as defined in Section 760.1(b) of the Regulations.

During the period 2008 through 2011, you engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to the United Arab Emirates and Malaysia, activities in the interstate or foreign commerce of the United States, as defined in Section 760.1(d) of the Regulations.

Charges 1 - 5 (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 2008 through 2011, on five occasions, you furnished, to persons in the United Arab Emirates, information, as described in Table A, which is attached and incorporated herein by this reference, concerning your or another person's past, present or proposed business relationships with or in a boycotted country, with a business concern organized under the laws of a boycotted country, or with a national or resident of a boycotted 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 five violations of Section 760.2(d).

Charges 6 - 63 (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 2008 through 2011, on fifty-eight occasions, you received a request, as described in Table B, 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 fifty-eight 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, to 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, 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

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>.

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

Schedule of Alleged Violations of Section 760.2(d)
Furnishing Prohibited Business Information

Digi-Key Corporation

Case No. 13.01

Item	Reference/Document Furnished	On or About	To	Information Furnished
1	SO # 23539915 / E-Mail	02.02.09	U.A.E.	...THE FOLLOWING PARTS...ARE NOT MADE IN ISRAEL.
2	SO # 23723297 / E-Mail	02.09.09	U.A.E.	...PART #478-1879-ND IS THE ONLY ONE NOT MADE IN ISRAEL...
3	SO # 29217708 / Invoice	02.07.11	U.A.E.	...VERIFIED THAT NO PARTS ON THE ORDER ARE "MADE IN ISRAEL"...
4	SO # 29443092 / E-Mail	03.04.11	U.A.E.	SHOULD I SHIP THESE SUBSTITUTES? THEY ARE FROM DIFFERENT MANUFACTURERS BUT NOT FROM ISRAEL
5	SO # 29491163 / Invoice	03.10.11	U.A.E.	CONFIRMED PARTS ON ORDER ARE NOT ORIGINATED FROM ISRAEL.

TABLE B

Schedule of Alleged Violations of Section 760.5

Failure to Report Receipts of Boycott Requests

Digi-Key Corporation

Case No. 13.01

Item	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
1	Sales Order # 22020424	05.21.08	07.31.08	Malaysia	PLEASE...CANCEL THE ITEM 10 TO 15...BECAUSE COUNTRY OF ORIGIN IS FROM ISRAEL AND EVERY PARTS SHIP FROM "ISRAEL" TO MALAYSIA WILL BE RETAIN BY OUR CUSTOM (sic)..
2	Sales Order # 23539915	02.02.09	04.30.09	U.A.E.	SEND ME...PIECES...INSTEAD OF HE (sic) PARTS WITH MADE IN ISREAL (sic)? BECAUSE LOCAL CUSTOM (sic) HERE WOULD NOT ALLOW PRODUCTS WITH "MADE IN ISREAL"(sic).
3	Sales Order # 23723297	02.08.09	04.30.09	U.A.E.	PLEASE MAKE SURE THAT THESE PARTS ARE NOT AND/OR LABELED AS "MADE IN ISRAEL"; UAE POLCIY (sic) WOULD NOT ALLOW IT IN.... PLEASE SUGGEST ALTERNATIVE PARTS THAT ARE MADE OUTSIDE ISRAEL.
4	Sales Order # 23814337	02.21.09	04.30.09	U.A.E.	PLEASE MAKE SURE THE PART IS NOT "MADE IN ISRAEL" OTHERWISE IT WILL BE RETURNED BACK BY CUSTOMS.
5	Sales Order # 24095687	04.06.09	07.31.09	U.A.E.	PLEASE MAKE SURE THAT NON (sic) OF THE PARTS ARE MADE IN ISREAL (sic) BECAUSE CUSTOMS WILL NOT ALLOW IT IN.
6	Sales Order # 24556593	06.17.09	07.31.09	U.A.E	PLEASE MAKE SURE NOT TO DELIEVER (sic) ANY COMPONENTS THAT ARE MADE IN ISREAL (sic). IT IS AGAINST THE LAW OF UAE...

* 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 (§ 760.5(b)4)(i)).

TABLE B

continued

Schedule of Alleged Violations of Section 760.5

Failure to Report Receipts of Boycott Requests

Digi-Key CorporationCase No. 13.01

Item	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request .
7	Sales Order # 25609437	11.16.09	01.31.10	U.A.E.	PLEASE MAKE SURE NON (sic) OF THE PARTS ARE MADE IN ISREAL (sic). IT IS AGAINST THE RULE OF THE COUNTRY....
8	Sales Order # 26031050	01.17.10	04.30.10	U.A.E.	...THE PARTS CANNOT BE "MADE IN ISREAL" (sic). IT IS AGAINST THE LAW OF UAE GOVERNMENT.
9	Sales Order # 27143772	05.29.10	07.31.10	U.A.E.	... PARTS "MADE IN ISREAL" (sic) ARE NOT ALLOWED IN UAE. IT IS THE LAW IN UAE. PLEASE DO NOT SEND ME THESE PARTS....
10	Sales Order # 27823130	08.30.10	10.31.10	U.A.E.	...WE MAY HAVE A PROBLEM TO IMPORT PARTS MADE IN ISRAEL. WOULD YOU PLEASE FIND THOSE PARTS MADE IN OTHER LOCATIONS? ...PLEASE DELETE...THE PARTS MADE IN ISRAEL AND REVISE YOUR PI TO US.
11	Sales Order # 28133446	09.25.10	10.31.10	U.A.E.	I WILL NOT RECEIVE ANY PART MANUFACTURED IN ISRAEL.
12	Sales Order # Q5788769	11.23.10	01.31.11	U.A.E.	...LET ME KNOW IF THERE IS ANY PARTS(S) MANUFACTURED IN ISRAEL IN THIS LIST AND ADVICE FOR SUBSTITUTION.
13	Sales Order # 28673438	11.25.10	01.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.

* 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 (§ 760.5(b)(4)(i)).

TABLE B
continued
Schedule of Alleged Violations of Section 760.5
Failure to Report Receipts of Boycott Requests

Digi-Key Corporation
Case No. 13.01

Item	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
14	Sales Order # 28671845	11.28.10	01.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
15	Sales Order # 28686768	11.29.10	01.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME
16	Sales Order # 28732792	12.05.10	01.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME
17	Sales Order # 28340878	12.06.10	01.31.11	U.A.E.	...ISRAEL COMPONENTS ARE PROHIBITED IN UAE...I WILL SEND IT BACK TO YOU
18	Sales Order # 28816538	12.13.10	01.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
19	Sales Order # 28850870	12.19.10	01.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
20	Sales Order # 28825369	12.19.10	01.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.

* 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 (§ 760.5(b)(4)(i)).

TABLE B
continued
Schedule of Alleged Violations of Section 760.5
Failure to Report Receipts of Boycott Requests

Digi-Key Corporation
Case No. 13.01

Item	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
21	Sales Order # 28898890	12.26.10	01.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
22	Sales Order # 28922846	01.02.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
23	Sales Order # 29038517	01.13.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
24	Sales Order # 29219218	02.06.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
25	Sales Order # 29217708	02.07.11	04.30.11	U.A.E.	ACCORDING TO UAE LAWS AND REGULATIONS NO COMPONENTS "MADE IN ISREAL" (sic) CAN BE ALLOWED. PLEASE ANY COMPONENT THAT ARE MADE IN ISREAL (sic) EITHER SEND ME A REPLACEMENT FROM DIFFERENT SOURCE OR TAKE THEM OFF THE ORDER LIST.
26	Sales Order # 29280939	02.10.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.

* 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 (§ 760.5(b)(4)(i)).

TABLE B
continued
Schedule of Alleged Violations of Section 760.5
Failure to Report Receipts of Boycott Requests

Digi-Key Corporation
Case No. 13.01

Item	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
27	Sales Order # 29346817	02.15.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
28	Sales Order # 29367818	02.22.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
29	Sales Order # 29403521	02.27.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
30	Sales Order # 29415858	03.01.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
31	Sales Order # 29441786	03.03.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
32	Sales Order # 29453943	03.03.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
33	Sales Order # 29443092	03.03.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.

* 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 (§ 760.5(b)(4)(i)).

TABLE B
continued
Schedule of Alleged Violations of Section 760.5
Failure to Report Receipts of Boycott Requests

Digi-Key Corporation
Case No. 13.01

Item	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
34	Sales Order # 29467681	03.03.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
35	Sales Order # 29491163	03.09.11	04.30.11	U.A.E.	PLEASE ENSURE THAT NO ONE COMPONENT HAS ORIGIN ISRAEL, AS SUCH IS PROHIBITED BY LOCAL AUTHORITY (sic).
36	Sales Order # 29491644	03.09.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
37	Sales Order # 29528870	03.13.11	04.30.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
38	Sales Order # 29647311	03.25.11	04.30.11	U.A.E.	PLEASE I DON'T WANT ANYTHING MANUFACTURED IN ISRAEL.
39	Sales Order # 29648939	03.26.11	04.30.11	U.A.E.	PLEASE I DON'T WANT ANY PART MANUFACTURED IN ISRAEL.
40	Sales Order # 29676902	03.30.11	04.30.11	U.A.E.	PLEASE I DON'T WANT ANY PART MANUFACTURED IN ISRAEL.

* 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 (§ 760.5(b)(4)(i)).

TABLE B
continued
Schedule of Alleged Violations of Section 760.5
Failure to Report Receipts of Boycott Requests

Digi-Key Corporation
Case No. 13.01

Item	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
41	Sales Order # 29779553	04.10.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
42	Sales Order # 29816093	04.14.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
43	Sales Order # 29897436	04.24.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
44	Sales Order # 29955485	04.28.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
45	Sales Order # 29955888	05.01.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
46	Sales Order # 30084993	05.17.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
47	Sales Order # 30085720	05.17.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.

* 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 (§ 760.5(b)(4)(i)).

TABLE B

continued

Schedule of Alleged Violations of Section 760.5

Failure to Report Receipts of Boycott Requests

Digi-Key CorporationCase No. 13.01

Item	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
48	Sales Order # 30129508	05.22.11	07.31.11	U.A.E.	...IT IS THE LAW OF UAE THAT PARTS IN THE COUNTRY SHALL NO BE "MADE IN ISREAL" (sic). IF ANY OF THE ORDERED PARTS ARE "MADE IN ISREAL" (sic), JUST SEND ME SIMILAR PART MADE IN A DIFFERENT PLACE
49	Sales Order # 30190871	05.29.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
50	Sales Order # 30242533	06.05.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
51	Sales Order # 30302103	06.07.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
52	Sales Order # 30370138	06.13.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
53	Sales Order # 30370221	06.20.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
54	Sales Order # 30372327	06.20.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.

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TABLE B
continued
Schedule of Alleged Violations of Section 760.5
Failure to Report Receipts of Boycott Requests

Digi-Key Corporation
Case No. 13.01

Item	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
55	Sales Order # 30393166	06.22.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
56	Sales Order # 30395442	06.23.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
57	Sales Order # 30417564	06.21.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.
58	Sales Order # 30451469	06.30.11	07.31.11	U.A.E.	GOODS OF ISRAEL ORIGIN IS PROHIBITED IN UNITED ARAB EMIRATES, AND WE WILL NOT ACCEPT THE SAME.

* 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 (§ 760.5(b)(4)(i)).