

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

In the Matter of:)
)
Norman Spector) 06-BIS-13
27 Bethpage Drive)
Monroe Township, NJ 08831)
)
Respondent.)

ORDER RELATING TO NORMAN SPECTOR

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) has initiated an administrative proceeding against Norman Spector (“Spector”) pursuant to Section 766.3 of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2007)) (the “Regulations”),¹ and Section 13(c) of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (the “Act”),² through issuance of a charging letter to Spector that alleged that Spector committed 44 violations of the Regulations. Specifically, the charges are:

Charges 1-14 15 C.F.R. §764.2(a) - Export of Microwave Amplifiers without the Required Licenses

On 14 occasions, between on or about November 9, 2000 and January 9, 2003, Spector engaged in conduct prohibited by the Regulations by exporting or causing to be exported microwave amplifiers, items subject to the Regulations and classified under Export

¹ The violations charged occurred between 2000 and 2003. The Regulations governing the violation at issue are found in the 2000 through 2003 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2000-2003)). The 2007 Regulations govern the procedural aspects of this case.

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)), as extended by successive Presidential Notices, the most recent being that of August 3, 2006 (71 Fed. Reg. 44,551 (Aug. 7, 2006)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1706 (2000)).

Control Classification Number ("ECCN") 3A001.b.4, to the People's Republic of China ("China") without the Department of Commerce license required by Section 742.4 of the Regulations. In so doing, Spector committed 14 violations of Section 764.2(a) of the Regulations.

Charge 15 15 C.F.R. § 764.2(c) - Attempted Export of Microwave Amplifiers without the Required License

On or about March 13, 2003, Spector attempted a violation of the Regulations by attempting to export microwave amplifiers, items subject to the Regulations and classified under ECCN 3A001.b.4, to China without the Department of Commerce license required by Section 742.4 of the Regulations. In so doing, Spector committed one violation of Section 764.2(c) of the Regulations.

Charges 16-30 15 C.F.R. § 764.2(e) - Selling Microwave Amplifiers with Knowledge of a Violation of the Regulations

With respect to the exports or attempted exports as described in Charges 1-15 above, Spector sold microwave amplifiers with the knowledge that a violation was about to occur or was intended to occur in connection with the microwave amplifiers. At all times relevant hereto, Spector knew or had reason to know that the microwave amplifiers in question required a Department of Commerce license for export to China, and that the required license had not been obtained. In so doing, Spector committed 15 violations of Section 764.2(e) of the Regulations.

Charge 31-44 15 C.F.R. § 764.2(g) - False Statement on Shipper's Export Declarations as to Authority to Export

With respect to the exports or attempted exports as described in Charges 1-11 and 13-15, above, Spector filed or caused to be filed Shipper's Export Declarations ("SEDs") with the United States Government that contained false statements of fact. Specifically, Spector filed or caused to be filed 14 SEDs that stated that the microwave amplifiers that were the subjects of the SEDs did not require licenses ("NLR"). This representation is false as at all times relevant to this case a Department of Commerce license was required to export the microwave amplifiers in question in this case to China. In so doing, Spector committed 14 violations of Section 764.2(g) of the Regulations.

WHEREAS, BIS and Spector have entered into a Settlement Agreement pursuant to Section 766.18(b) of the Regulations whereby they agreed to settle this matter in accordance with the terms and conditions set forth therein, and

WHEREAS, I have approved of the terms of such Settlement Agreement;

IT IS THEREFORE ORDERED:

FIRST, that a civil penalty of \$462,000 is assessed against Spector. Spector shall pay \$22,000 to the U.S. Department of Commerce within 30 days of from the date of entry of this Order. Payment shall be made in the manner specified in the attached instructions. Payment of the remaining \$440,000 shall be suspended for a period of one year from the date of entry of this Order and thereafter shall be waived, provided that during the period of suspension, Spector has committed no violation of the Act, or any regulation, order, or license issued thereunder and has made the payment of \$22,000, described above, in a timely manner.

SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (2000)), 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, Spector will be assessed, in addition to the full amount of the civil penalty and interest, a penalty charge and an administrative charge, as more fully described in the attached Notice.

THIRD, that the timely payment of the civil penalty set forth above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Spector. Accordingly, if Spector should fail to pay the civil penalty in a timely manner, the undersigned may enter an Order denying all of Spector's export privileges under the Regulations for a period of one year from the date of entry of this Order.

FOURTH, that for a period of twenty-five years from the date of entry of this Order, Norman Spector, 27 Bethpage Drive, Monroe Township, New Jersey 08831, and, when acting for or on behalf of Spector, his representatives, agents, assigns, or employees,

("Denied Person") may not participate, directly or indirectly, in any way in any transaction involving any commodity, software, or technology (hereinafter collectively referred to as "item") exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations, including, but not limited to:

- A. Applying for, obtaining, or using any license, License Exception, or export control document;
- B. Carrying on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations; or
- C. Benefiting in any way from any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations.

FIFTH, that no person may, directly or indirectly, do any of the following:

- A. Export or reexport to or on behalf of the Denied Person any item subject to the Regulations;
- B. Take any action that facilitates the acquisition or attempted acquisition by the Denied Person of the ownership, possession, or control of any item subject to the Regulations that has been or will be exported from the United States, including financing or other support activities related to a

transaction whereby the Denied Person acquires or attempts to acquire such ownership, possession or control;

- C. Take any action to acquire from or to facilitate the acquisition or attempted acquisition from the Denied Person of any item subject to the Regulations that has been exported from the United States;
- D. Obtain from the Denied Person in the United States any item subject to the Regulations with knowledge or reason to know that the item will be, or is intended to be, exported from the United States; or
- E. Engage in any transaction to service any item subject to the Regulations that has been or will be exported from the United States and which is owned, possessed or controlled by the Denied Person, or service any item, of whatever origin, that is owned, possessed or controlled by the Denied Person if such service involves the use of any item subject to the Regulations that has been or will be exported from the United States. For purposes of this paragraph, servicing means installation, maintenance, repair, modification or testing.

SIXTH, that, after notice and opportunity for comment as provided in Section 766.23 of the Regulations, any person, firm, corporation, or business organization related to Spector by affiliation, ownership, control, or position of responsibility in the conduct of trade or related services may also be made subject to the provisions of the Order.

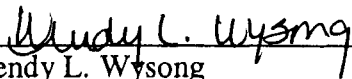
SEVENTH, that this Order does not prohibit any export, reexport, or other transaction subject to the Regulations where the only items involved that are subject to the Regulations are the foreign-produced direct product of U.S.-origin technology.

EIGHTH, that the charging letter, the Settlement Agreement, this Order, and the record of this case as defined by Section 766.20 of the Regulations shall be made available to the public.

NINTH, that the administrative law judge shall be notified that this case is withdrawn from adjudication.

TENTH, that this Order shall be served on the Denied Person and on BIS, and shall be published in the Federal Register.

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



Wendy L. Wysong
Acting Assistant Secretary of Commerce
for Export Enforcement

Entered this 21st day of August, 2007.

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

In the Matter of:)	
)	
Norman Spector)	06-BIS-13
8 Burling Lane)	
Old Bethpage, New York 11804)	
)	
Respondent.)	

SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") is made by and between Norman Spector ("Spector") and the Bureau of Industry and Security, U.S. Department of Commerce ("BIS") (collectively, the "Parties"), pursuant to Section 766.18(b) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2007)) (the "Regulations"),¹ issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (the "Act"),²

WHEREAS, BIS has initiated an administrative proceeding against Spector, pursuant to the Act and the Regulations;

¹ The violations charged occurred between 2000 and 2003. The Regulations governing the violation at issue are found in the 2000 through 2003 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2000-2003)). The 2007 Regulations govern the procedural aspects of this case.

² Since August 21, 2001 the Act has been in lapse. However, 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 3, 2006 (71 Fed. Reg. 44,551 (Aug. 7, 2006)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1706 (2000)).

Settlement Agreement
Norman Spector
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WHEREAS, BIS has issued a charging letter to Spector that alleged that Spector committed 44 violations of the Regulations, specifically:

Charges 1-14 15 C.F.R. §764.2(a) - Export of Microwave Amplifiers without the Required Licenses

On 14 occasions, between on or about November 9, 2000 and January 9, 2003, Spector engaged in conduct prohibited by the Regulations by exporting or causing to be exported microwave amplifiers, items subject to the Regulations and classified under Export Control Classification Number ("ECCN") 3A001.b.4, to the People's Republic of China ("China") without the Department of Commerce license required by Section 742.4 of the Regulations. In so doing, Spector committed 14 violations of Section 764.2(a) of the Regulations.

Charge 15 15 C.F.R. § 764.2(c) - Attempted Export of Microwave Amplifiers without the Required License

On or about March 13, 2003, Spector attempted a violation of the Regulations by attempting to export microwave amplifiers, items subject to the Regulations and classified under ECCN 3A001.b.4, to China without the Department of Commerce license required by Section 742.4 of the Regulations. In so doing, Spector committed one violation of Section 764.2(c) of the Regulations.

Charges 16-30 15 C.F.R. § 764.2(e) - Selling Microwave Amplifiers with Knowledge of a Violation of the Regulations

With respect to the exports or attempted exports as described in Charges 1-15 above, Spector sold microwave amplifiers with the knowledge that a violation was about to occur or was intended to occur in connection with the microwave amplifiers. At all times relevant hereto, Spector knew or had reason to know that the microwave amplifiers in question required a Department of Commerce license for export to China, and that the required license had not been obtained. In so doing, Spector committed 15 violations of Section 764.2(e) of the Regulations.

Charge 31-44 15 C.F.R. § 764.2(g) - False Statement on Shipper's Export Declarations as to Authority to Export

With respect to the exports or attempted exports as described in Charges 1-11 and 13-15, above, Spector filed or caused to be filed Shipper's Export Declarations ("SEDs") with the United States Government that contained false statements of fact. Specifically, Spector filed or caused to be filed 14 SEDs that stated that the microwave amplifiers that were the subjects of the SEDs did not require licenses ("NLR"). This representation is false as at all times relevant to this case a Department of Commerce license was required to export the microwave amplifiers in question in this case to China. In so doing, Spector committed 14 violations of Section 764.2(g) of the Regulations.

Settlement Agreement
Norman Spector
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WHEREAS, Spector has reviewed the charging letter and is aware of the allegations made against him and the administrative sanctions which could be imposed against him if the allegations are found to be true;

WHEREAS, Spector fully understands the terms of this Agreement and the Order ("Order") that the Assistant Secretary of Commerce for Export Enforcement will issue if he approves this Agreement as the final resolution of this matter;

WHEREAS, Spector enters into this Agreement voluntarily and with full knowledge of his rights;

WHEREAS, Spector states that no promises or representations have been made to him other than the agreements and considerations herein expressed;

WHEREAS, Spector neither admits nor denies the allegations contained in the charging letter;

WHEREAS, Spector wishes to settle and dispose of all matters alleged in the charging letter by entering into this Agreement; and

WHEREAS, Spector agrees to be bound by the Order, if entered;

NOW THEREFORE, the Parties hereby agree as follows:

1. BIS has jurisdiction over Spector, under the Regulations, in connection with the matters alleged in the charging letter.
2. The following sanctions shall be imposed against Spector in complete settlement of the alleged violations of the Regulations relating to the transactions specifically detailed in the charging letter:

Settlement Agreement
Norman Spector
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- a. Spector shall be assessed a civil penalty in the amount of \$462,000.
Spector shall pay \$22,000 to the U.S. Department of Commerce within 30 days from the date of this order. Payment of the remaining \$440,000 shall be suspended for a period of one year from the date of entry of the Order and thereafter shall be waived, provided that during the period of suspension, Spector has committed no violation of the Act, or any regulation, order, or license issued thereunder and has made the payment of \$22,000, described above, in a timely manner.
- b. The timely payment of the civil penalty agreed to in paragraph 2.a 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 Spector. Failure to make timely payment of the civil penalty set forth above may result in the denial of all of Spector's export privileges for a period of one year from the date of imposition of the penalty.
- c. For a period of twenty five years from the date of entry of the Order, Spector, and, when acting for or on behalf of Spector, his representatives, assigns, or agents ("Denied Person") may not participate, directly or indirectly, in any way in any transaction involving any commodity, software or technology (hereinafter collectively referred to as "Item") exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations, including, but not limited to:

Settlement Agreement
Norman Spector
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- i. Applying for, obtaining, or using any license, License Exception, or export control document;
 - ii. Carrying on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations; or
 - iii. Benefiting in any way from any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations.
3. Subject to the approval of this Agreement pursuant to paragraph 8 hereof, Spector hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violations of this Agreement or the Order, if entered), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in the charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if entered; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if entered.
4. Upon entry of the Order, BIS will not initiate any further administrative proceeding against Spector in connection with any violation of the Act or the Regulations arising out of the transactions identified in the charging letter.

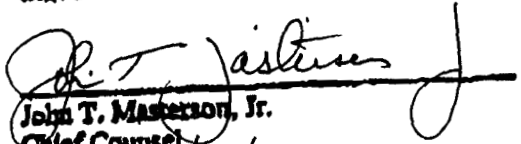
5. BIS will make the charging letter, this Agreement, and the Order, if entered, and the record of the case as described in Section 766.20 of the Regulations available to the public.
6. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement pursuant to Section 766.18(b) of the Regulations, no Party may use this Agreement in any administrative or judicial proceeding and the Parties shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding.
7. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, if entered, nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the U.S. Government with respect to the facts and circumstances addressed herein.
8. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement approves it by entering the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

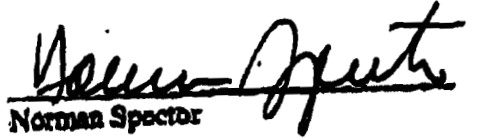
Settlement Agreement
Norman Spector
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9. Each signatory affirms that he has authority to enter into this Settlement Agreement and to bind his respective party to the terms and conditions set forth herein.

BUREAU OF INDUSTRY AND SECURITY
U.S. DEPARTMENT OF COMMERCE

NORMAN SPECTOR


John T. Masterson, Jr.
Chief Counsel
Date: 8/16/07


Norman Spector
Date: 8/13/07

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Norman Spector
8 Burling Lane
Old Bethpage, New York 11804

Attn: *Mr. Norman Spector*

Dear Mr. Spector:

The Bureau of Industry and Security, United States Department of Commerce ("BIS"), has reason to believe that Norman Spector ("Spector") as President of Spector International, Inc., doing business as Norsal Export Limited ("Norsal"), of Old Bethpage, New York, in your individual capacity, has committed 44 violations of the Export Administration Regulations (the "Regulations"),¹ which are issued under the authority of the Export Administration Act of 1979, as amended (the "Act").² Specifically, BIS charges that Spector committed the following violations:

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2006). The violations charged occurred between 2000 and 2003. The Regulations governing the violation at issue are found in the 2000 through 2003 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2000-2003)). The 2006 Regulations govern the procedural aspects of this case.

² 50 U.S.C. app. §§ 2401- 2420 (2000). From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential Notices, the last of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 - 1706 (2000)) ("IEEPA"). On November 13, 2000, the Act was reauthorized by Pub. L. No. 106-508 and it remained in effect through August 20, 2001. Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp., p. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of August 2, 2005 (70 *Fed. Reg.* 45273 (August 5, 2005)), continues the Regulations in effect under IEEPA.

Charges 1-14 (15 C.F.R. §764.2(a) - Export of Microwave Amplifiers without the Required Licenses)

On 14 occasions, between on or about November 9, 2000 and January 9, 2003, Spector engaged in conduct prohibited by the Regulations by exporting or causing to be exported microwave amplifiers, items subject to the Regulations and classified under Export Control Classification Number ("ECCN") 3A001.b.4, to the People's Republic of China ("China") without the Department of Commerce license required by Section 742.4 of the Regulations. *See* Schedule A, which is enclosed herewith and incorporated herein by reference. In so doing, Spector committed 14 violations of Section 764.2(a) of the Regulations.

Charge 15 (15 C.F.R. § 764.2(c) - Attempted Export of Microwave Amplifiers without the Required License)

On or about March 13, 2003, Spector attempted a violation of the Regulations by attempting to export microwave amplifiers, items subject to the Regulations and classified under ECCN 3A001.b.4, to China without the Department of Commerce license required by Section 742.4 of the Regulations. *See* Schedule A, which is enclosed herewith and incorporated herein by reference. In so doing, Spector committed one violation of Section 764.2(c) of the Regulations.

Charges 16-30 (15 C.F.R. § 764.2(e) - Selling Microwave Amplifiers with Knowledge of a Violation of the Regulations)

With respect to the exports or attempted exports as described in Charges 1-15 above, Spector sold microwave amplifiers with the knowledge that a violation was about to occur or was intended to occur in connection with the microwave amplifiers. At all times relevant hereto, Spector knew or had reason to know that the microwave amplifiers in question required a Department of Commerce license for export to China, and that the required license had not been obtained. *See* Schedule A, which is enclosed herewith and incorporated herein by reference. In so doing, Spector committed 15 violations of Section 764.2(e) of the Regulations.

Charge 31-44 (15 C.F.R. § 764.2(g) - False Statement on Shipper's Export Declarations as to Authority to Export)

With respect to the exports or attempted exports as described in Charges 1-11 and 13-15, above, Spector filed or caused to be filed Shipper's Export Declarations ("SEDs") with the United States Government that contained false statements of fact. Specifically, Spector filed or caused to be filed 14 SEDs that stated that the microwave amplifiers that were the subjects of the SEDs did not require licenses ("NLR"). *See* Schedule A, which is enclosed herewith and incorporated herein by reference. This representation is false as at all times relevant to this case a Department

of Commerce license was required to export the microwave amplifiers in question in this case to China. In so doing, Spector committed 14 violations of Section 764.2(g) of the Regulations.

* * * * *

Accordingly, Spector is hereby notified that an administrative proceeding is instituted against him pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including any or all of the following:

The maximum civil penalty allowed by law of up to \$11,000 per violation;³

Denial of export privileges; and/or

Exclusion from practice before BIS.

If Spector fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter, that failure will be treated as a default. (Regulations, Sections 766.6 and 766.7). If Spector defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Spector. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty on each of the charges in this letter.

Spector is further notified that he is entitled to an agency hearing on the record if Spector files a written demand for one with its answer. (Regulations, Section 766.6). Spector is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent him. (Regulations, Sections 766.3(a) and 766.4).

The Regulations provide for settlement without a hearing. (Regulations, Section 766.18). Should Spector have a proposal to settle this case, Spector or his representative should transmit it through the attorney representing BIS named below.

The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, Spector's answer must be filed in accordance with the instructions in Section 766.5(a) of the Regulations with:

U.S. Coast Guard ALJ Docketing Center
40 S. Gay Street
Baltimore, Maryland 21202-4022

³ See 15 C.F.R. § 6.4(a)(4).

Norman Spector
Charging Letter
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In addition, a copy of Spector's answer must be served on BIS at the following address:

Chief Counsel for Industry and Security
Attention: Thea D. R. Kendler, Esq.
Attention: James C. Pelletier, Esq.
Room H-3839
United States Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Thea D. R. Kendler and James C. Pelletier are the attorneys representing BIS in this case; any communications that Spector may wish to have concerning this matter should occur through them. They may be contacted by telephone at (202) 482-5301.

Sincerely,

Michael D. Turner
Director
Office of Export Enforcement

Norman Spector
Schedule of Violations

SCHEDULE A

CHARGES	DATE OF VIOLATION	DESTINATION	COMMODITY EXPORTED	ECCN	VALUE	INVOICE NUMBER	UPS WAYBILL NUMBER	VIOLATIONS CHARGED (15 C.F.R.)
1, 16, 31	11/9/2000	China	Microwave Amplifiers	3A001	\$23,535.00	00002935	4623 911 231 7	§ 764.2(a), (e), (g)
2, 17, 32	10/4/2001	China	Microwave Amplifiers	3A001	\$10,315.00	00003210 / 00003211	4633 949 329 9	§ 764.2(a), (e), (g)
3, 18, 33	1/31/2002	China	Microwave Amplifiers	3A001	\$28,234.00	00003311	4651 063 043 0	§ 764.2(a), (e), (g)
4, 19, 34	2/27/2002	China	Microwave Amplifiers	3A001	\$12,534.00	00003334	4651 063 066 3	§ 764.2(a), (e), (g)
5, 20, 35	3/8/2002	China	Microwave Amplifiers	3A001	\$2,852.00	00003346	4651 063 065 4	§ 764.2(a), (e), (g)
6, 21, 36	3/28/2002	China	Microwave Amplifiers	3A001	\$3,090.00	00003369	4645 714 216 8	§ 764.2(a), (e), (g)
7, 22, 37	4/4/2002	China	Microwave Amplifiers	3A001	\$9,220.00	00003377	4645 714 217 7	§ 764.2(a), (e), (g)
8, 23, 38	4/18/2002	China	Microwave Amplifiers	3A001	\$4,888.00	00003391	4645 714 218 6	§ 764.2(a), (e), (g)
9, 24, 39	4/30/2002	China	Microwave Amplifiers	3A001	\$47,270.00	00003514	4645 714 213 1	§ 764.2(a), (e), (g)
10, 25, 40	6/28/2002	China	Microwave Amplifiers	3A001	\$24,219.00	00003452	4645 714 221 1	§ 764.2(a), (e), (g)
11, 26, 41	8/22/2002	China	Microwave Amplifiers	3A001	\$18,839.00	00003498	4651 063 047 6	§ 764.2(a), (e), (g)

Norman Spector
 Schedule of Violations

CHARGES	DATE OF VIOLATION	DESTINATION	COMMODITY EXPORTED	ECCN	VALUE	INVOICE NUMBER	UPS WAYBILL NUMBER	VIOLATIONS CHARGED (15 C.F.R.)
12, 27	9/20/2002	China	Microwave Amplifiers	3A001	\$16,484.23	00003526	4651 063 050 1	§ 764.2(a), (e)
13, 28, 42	10/3/2002	China	Microwave Amplifiers	3A001	\$10,220.00	00003535	4651 063 051 0	§ 764.2(a), (e), (g)
14, 29, 43	1/9/2003	China	Microwave Amplifiers	3A001	\$2,352.00	00003623	4660 965 990 1	§ 764.2(a), (e), (g)
15, 30, 44	3/13/2003	China	Microwave Amplifiers	3A001	\$3,885.00	00003866	4660 965 988 5	§ 764.2(c), (e), (g)

Norman Spector
Schedule of Violations

SCHEDULE A

CHARGE NUMBERS	DATE OF VIOLATION	DESTINATION	COMMODITY EXPORTED	ECCN	VALUE	VIOLATIONS CHARGED (15 C.F.R.)
1, 16, 31	11/9/00	China	Microwave Amplifiers	3A001	\$23,535.00	§ 764.2(a), (e), (g)
2, 17, 32	10/4/01	China	Microwave Amplifiers	3A001	\$10,315.00	§ 764.2(a), (e), (g)
3, 18, 33	1/31/02	China	Microwave Amplifiers	3A001	\$28,234.00	§ 764.2(a), (e), (g)
4, 19, 34	2/27/02	China	Microwave Amplifiers	3A001	\$12,534.00	§ 764.2(a), (e), (g)
5, 20, 35	3/8/02	China	Microwave Amplifiers	3A001	\$2,852.00	§ 764.2(a), (e), (g)
6, 21, 36	3/28/02	China	Microwave Amplifiers	3A001	\$3,090.00	§ 764.2(a), (e), (g)
7, 22, 37	4/4/02	China	Microwave Amplifiers	3A001	\$9,220.00	§ 764.2(a),(e), (g)
8, 23, 38	4/18/02	China	Microwave Amplifiers	3A001	\$4,888.00	§ 764.2(a), (e), (g)
9, 24, 39	4/30/02	China	Microwave Amplifiers	3A001	\$47,270.00	§ 764.2(a), (e), (g)
10, 25, 40	6/28/02	China	Microwave Amplifiers	3A001	\$24,219.00	§ 764.2(a), (e), (g)
11, 26, 41	8/22/02	China	Microwave Amplifiers	3A001	\$18,839.00	§ 764.2(a), (e), (g)
12, 27	9/20/02	China	Microwave Amplifiers	3A001	\$16,494.23	§ 764.2(a), (e)
13, 28, 42	10/3/02	China	Microwave Amplifiers	3A001	\$10,220.00	§ 764.2(a), (e), (g)
14, 29, 43	1/9/03	China	Microwave Amplifiers	3A001	\$2,352.00	§ 764.2(a), (e), (g)
15, 30, 44	3/13/03	China	Microwave Amplifiers	3A001	\$3,885.00	§ 764.2(c), (e), (g)