

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

\_\_\_\_\_  
In the Matter of: )  
 )  
Spector International, Inc. ) 06-BIS-14  
d/b/a Norsal Export Limited )  
27 Bethpage Drive )  
Monroe Township, NJ 08831 )  
 )  
\_\_\_\_\_  
Respondent. )

ORDER RELATING TO SPECTOR INTERNATIONAL, INC.  
D/B/A NORSAL EXPORT LTD.

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

Specifically, the charges are:

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<sup>1</sup> 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.

<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)), 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)).

**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, Norsal 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, Norsal 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, Norsal 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, Norsal 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, Norsal 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, Norsal 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, Norsal 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, Norsal filed or caused to be filed Shipper's Export Declarations ("SEDs") with the United States Government that contained false statements of fact. Specifically, Norsal 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, Norsal committed 14 violations of Section 764.2(g) of the Regulations.

WHEREAS, BIS and Norsal 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 Norsal. Payment 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, Norsal has committed no violation of the Act, or any regulation, order, or license issued thereunder.

SECOND, for a period of twenty-five years from the date of entry of this Order, Spector International, Inc. doing business as Norsal Export Limited, 27 Bethpage Drive, Monroe Township, New Jersey 08831, ("Norsal"), its successors or assigns, and when acting for or on behalf of Norsal, its representatives, agents, officers 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.

THIRD, 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.

FOURTH, 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 Norsal 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 this Order.

FIFTH, 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.

SIXTH, 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.

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

EIGHTH, 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  
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: )  
)  
Spector International, Inc. )  
d/b/a Norsal Export Limited )  
1045a Park Blvd. Ste 3 )  
Massapequa Park, New York 11762 )  
)  
Respondent. )

06-BIS-14

SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") is made by and between Spector International, Inc. doing business as Norsal Export Limited ("Norsal") 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"),<sup>1</sup> issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (the "Act"),<sup>2</sup>

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

<sup>1</sup> 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.

<sup>2</sup> 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  
Spector International, Inc. d/b/a Norsal Export Ltd.  
Page 2 of 6

WHEREAS, BIS has issued a charging letter to Norsal that alleged that Norsal 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, Norsal 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, Norsal 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, Norsal 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, Norsal 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, Norsal 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, Norsal 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, Norsal 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, Norsal filed or caused to be filed Shipper's Export Declarations ("SEDs") with the United States Government that contained false statements of fact. Specifically, Norsal 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, Norsal committed 14 violations of Section 764.2(g) of the Regulations.



Settlement Agreement  
Spector International, Inc. d/b/a Norsal Export Ltd.  
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WHEREAS, Norsal has reviewed the charging letter and is aware of the allegations made against it and the administrative sanctions which could be imposed against it if the allegations are found to be true;

WHEREAS, Norsal 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, Norsal enters into this Agreement voluntarily and with full knowledge of its rights;

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

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

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

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

NOW THEREFORE, the Parties hereby agree as follows:

1. BIS has jurisdiction over Norsal, under the Regulations, in connection with the matters alleged in the charging letter.
2. The following sanctions shall be imposed against Norsal in complete settlement of the alleged violations of the Regulations relating to the transactions specifically detailed in the charging letter:
  - a. Norsal shall be assessed a civil penalty in the amount of \$462,000, all of which shall be suspended for a period of one year from the date of entry of

Settlement Agreement  
Spector International, Inc. d/b/a Norsal Export Ltd.  
Page 4 of 6

the Order and thereafter shall be waived, provided that during the period of suspension, Norsal has committed no violation of the Act, or any regulation, order, or license issued thereunder.

b. For a period of twenty five years from the date of entry of the Order, Norsal, its successors or assigns, and, when acting for or on behalf of Norsal, its representatives, agents, 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:

- 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 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; or

**Settlement Agreement**  
**Spector International, Inc. d/b/a Norsal Export Ltd.**  
**Page 5 of 6**

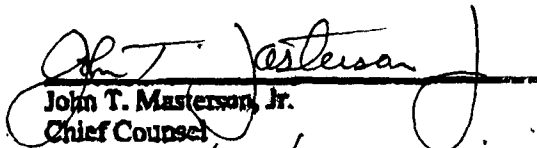
- iii. **Benefiting in any way from any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations.**
3. **Subject to the approval of this Agreement pursuant to paragraph 8 hereof, Norsal hereby 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 Norsal 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.**

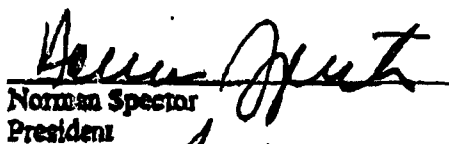
Settlement Agreement  
Spector International, Inc. d/b/a Norsal Export Ltd.  
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- 7. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or 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.
- 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

SPECTOR INTERNATIONAL, INC. D/B/A  
NORSAL EXPORT LTD.

  
 John T. Masterson, Jr.  
 Chief Counsel

  
 Norman Spector  
 President

Date: 8/16/07

Date: 8/13/07

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Spector International, Inc.  
d/b/a Norsal Export Limited  
1045a Park Blvd. Ste. 3  
Massapequa Park, New York 11762

Attn: *Norman Spector*  
*President*

Dear Mr. Spector:

The Bureau of Industry and Security, United States Department of Commerce ("BIS"), has reason to believe that Spector International Inc., doing business as Norsal Export Limited ("Norsal"), of Massapequa Park, New York, has committed 44 violations of the Export Administration Regulations (the "Regulations"),<sup>1</sup> which are issued under the authority of the Export Administration Act of 1979, as amended (the "Act").<sup>2</sup> Specifically, BIS charges that Norsal committed the following violations:

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<sup>1</sup> 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.

<sup>2</sup> 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, Norsal 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, Norsal 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, Norsal 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, Norsal 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, Norsal 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, Norsal 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, Norsal 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, Norsal filed or caused to be filed Shipper's Export Declarations ("SEDs") with the United States Government that contained false statements of fact. Specifically, Norsal 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, Norsal committed 14 violations of Section 764.2(g) of the Regulations.

\* \* \* \* \*

Accordingly, Norsal is hereby notified that an administrative proceeding is instituted against it 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;<sup>3</sup>

Denial of export privileges; and/or

Exclusion from practice before BIS.

If Norsal 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 Norsal defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Norsal. 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.

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

The Regulations provide for settlement without a hearing. (Regulations, Section 766.18). Should Norsal have a proposal to settle this case, Norsal or its 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, Norsal'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

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<sup>3</sup> See 15 C.F.R. § 6.4(a)(4).

Spector International, Inc., d/b/a Norsal Export Limited  
Charging Letter  
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In addition, a copy of Norsal'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 Norsal 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



Spector International, Inc., d/b/a Norsal Export Limited  
 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)

Spector International, Inc., d/b/a Norsal Export Limited  
 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)