

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

In the Matter of:

Kintetsu World Express (U.S.A.), Inc.
30 Murray Hill Parkway Suite 200
East Rutherford, New Jersey 07073

Respondent

ORDER RELATING TO
KINTETSU WORLD EXPRESS (U.S.A.), INC.

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Kintetsu World Express (U.S.A.), Inc. of East Rutherford, New Jersey (“KWE”), of its intention to initiate an administrative proceeding against KWE pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),¹ and Section 13(c) of the Export Administration Act of 1979, as amended (the “Act”),² through the issuance of a Proposed Charging Letter to KWE that alleges that KWE committed one violation of the Regulations. Specifically, the charge is:

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2014). The charged violation occurred in 2010. The Regulations governing the violation at issue are found in the 2010 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774). The 2014 Regulations set forth the procedures that apply to this matter.

² 50 U.S.C. app. §§ 2401-2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of August 7, 2014 (79 Fed. Reg. 46959 (Aug. 11, 2014)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*) (2006 & Supp. IV 2010)).

Charge 1 **15 C.F.R. § 764.2(b): Causing, Aiding, or Abetting an Act Prohibited by the Regulations**

On one occasion, on or about May 23, 2010, KWE caused, aided, and/or abetted an act prohibited by the Regulations. Specifically, KWE, acting as a freight forwarder, facilitated the export of three spiral duct production machines and related accessories, items subject to the Regulations, designated EAR99,³ and valued at a figure of at least \$250,000, from the United States to China National Precision Machinery Import/Export Corporation (“CPMIEC”) in Beijing, People’s Republic of China, without the required U.S. Government authorization. KWE arranged for the shipment of the items to CPMIEC and filed a Shipper’s Export Declaration (“SED”) in the Automated Export System indicating that the export was designated “NLR” (No License Required).

CPMIEC is a party listed in Appendix A to 31 C.F.R. Chapter V with the bracketed suffix [NPWMD]. This appendix includes the list of Specially Designated Nationals and Blocked Persons (“SDN List”), administered by the Department of the Treasury’s Office of Foreign Assets Control (“OFAC”). The bracketed suffix [NPWMD] identifies parties whose property or interests in property are blocked pursuant to Executive Order 13382 of June 28, 2005 ((Blocking Property of Weapons of Mass Destruction Proliferators and Their Supporters) (70 Fed. Reg. 38,567 (July 1, 2005))). OFAC added CPMIEC to the SDN List with the bracketed suffix [NPWMD] on June 13, 2006,⁴ and announced that CPMIEC had supplied Iran’s military and Iranian proliferators with missile-related dual-use items.⁵ At all relevant times hereto, CPMIEC remained a party listed on the SDN List with the bracketed suffix [NPWMD]. KWE did not check the SDN List (or any other screening list) in connection with either its preparation of the SED or the other arrangements it made relating to the export of the items to CPMIEC.

³ EAR99 is a designation for items subject to the Regulations that are not listed on the Commerce Control List, which is set forth at Supplement No. 1 to Part 774 of the Regulations. 15 C.F.R. § 774.1 (2010).

⁴ See <http://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20060613.aspx>; see also 71 Fed. Reg. 39,708 (July 13, 2006) (amending Appendix A to 31 C.F.R. Chapter V to reflect additions and deletions to the SDN List that had occurred as of June 26, 2006).

⁵ See <http://www.treasury.gov/press-center/press-releases/Pages/js4317.aspx>. OFAC’s announcement also indicated that in 2004, the State Department had imposed sanctions against CPMIEC pursuant to the Iran Nonproliferation Act of 2000 for transferring equipment and technology to Iran that was either controlled under multilateral export control regimes or which had the potential to make a material contribution to weapons of mass destruction. *Id.*

Pursuant to Section 744.8(a) of the Regulations, an EAR license is required for the export or reexport of any item subject to the EAR to any party listed in Appendix A to Chapter V of 31 C.F.R. with the bracketed suffix [NPWMD].⁶ U.S. persons who seek to export or reexport items subject to both the EAR and to OFAC's authority under Executive Order 13382 may seek authorization from OFAC in lieu of authorization from BIS. No authorization was sought or obtained from BIS or OFAC in connection with the export to CPMIEC described herein.

In causing, aiding, and/or abetting the export of the items to CPMIEC, a party listed in Appendix A to 31 C.F.R. Chapter V with the bracketed suffix [NPWMD], without the required U.S. Government authorization, KWE committed one violation of Section 764.2(b) of the Regulations.

WHEREAS, BIS and KWE have entered into a Settlement Agreement pursuant to Section 766.18(a) 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, KWE shall be assessed a civil penalty in the amount of \$30,000, the payment of which shall be made to the U.S. Department of Commerce within 30 days of the date of this Order.

SECOND, 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, KWE 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.

⁶ Section 744.8(c) of the Regulations provides that applications for EAR licenses under Section 744.8 generally will be denied.

THIRD, the full and timely payment of the civil penalty as 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 KWE. Accordingly, if KWE should fail to pay the civil penalty in a full and timely manner, the undersigned may issue an order denying all of KWE's export privileges under the Regulations for a period of one year from the date of failure to make such payment.

FOURTH, KWE shall not take any action or make or permit to be made any public statement, directly or indirectly, denying the allegations in the Proposed Charging Letter or this Order. The foregoing does not affect KWE's testimonial obligations in any proceeding; nor does it affect its right to take legal or factual positions in civil litigation or other civil proceedings in which the U.S. Department of Commerce is not a party.

FIFTH, that the Proposed Charging Letter, the Settlement Agreement, and this Order shall be made available to the public.

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



David W. Mills
Assistant Secretary of Commerce
for Export Enforcement

Issued this 26th day of September, 2014.

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

In the Matter of:

Kintetsu World Express (U.S.A.), Inc.
30 Murray Hill Parkway Suite 200
East Rutherford, New Jersey 07073

Respondent

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Kintetsu World Express (U.S.A.), Inc., of East Rutherford, New Jersey (“KWE”), and the Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) (collectively, the “Parties”), pursuant to Section 766.18(a) of the Export Administration Regulations (the “Regulations”),¹ issued pursuant to the Export Administration Act of 1979, as amended (the “Act”).²

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2014). The charged violation occurred in 2010. The Regulations governing the violation at issue are found in the 2010 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774). The 2014 Regulations set forth the procedures that apply to this matter.

² 50 U.S.C. app. §§ 2401-2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of August 7, 2014 (79 Fed. Reg. 46959 (Aug. 11, 2014)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, et seq. (2006 & Supp. IV 2010)).

WHEREAS, BIS has notified KWE of its intentions to initiate an administrative proceeding against KWE pursuant to the Act and the Regulations;

WHEREAS, BIS has issued a Proposed Charging Letter to KWE that alleges that KWE committed one violation of the Regulations, specifically:

**Charge 1 15 C.F.R. § 764.2(b): Causing, Aiding, or Abetting an Act
Prohibited by the Regulations**

On one occasion, on or about May 23, 2010, KWE caused, aided, and/or abetted an act prohibited by the Regulations. Specifically, KWE, acting as a freight forwarder, facilitated the export of three spiral duct production machines and related accessories, items subject to the Regulations, designated EAR99,³ and valued at a figure of at least \$250,000, from the United States to China National Precision Machinery Import/Export Corporation (“CPMIEC”) in Beijing, People’s Republic of China, without the required U.S. Government authorization. KWE arranged for the shipment of the items to CPMIEC and filed a Shipper’s Export Declaration (“SED”) in the Automated Export System indicating that the export was designated “NLR” (No License Required).

CPMIEC is a party listed in Appendix A to 31 C.F.R. Chapter V with the bracketed suffix [NPWMD]. This appendix includes the list of Specially Designated Nationals and Blocked Persons (“SDN List”), administered by the Department of the Treasury’s Office of Foreign Assets Control (“OFAC”). The bracketed suffix [NPWMD] identifies parties whose property or interests in property are blocked pursuant to Executive Order 13382 of June 28, 2005 ((Blocking Property of Weapons of Mass Destruction Proliferators and Their Supporters) (70 Fed. Reg. 38,567 (July 1, 2005))). OFAC added CPMIEC to the SDN List with the bracketed suffix [NPWMD] on June 13, 2006,⁴ and announced that CPMIEC had supplied Iran’s military and Iranian proliferators with missile-related dual-use items.⁵ At all relevant times hereto, CPMIEC remained a party listed on the SDN

³ EAR99 is a designation for items subject to the Regulations that are not listed on the Commerce Control List, which is set forth at Supplement No. 1 to Part 774 of the Regulations. 15 C.F.R. § 774.1 (2010).

⁴ See <http://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20060613.aspx>; see also 71 Fed. Reg. 39,708 (July 13, 2006) (amending Appendix A to 31 C.F.R. Chapter V to reflect additions and deletions to the SDN List that had occurred as of June 26, 2006).

⁵ See <http://www.treasury.gov/press-center/press-releases/Pages/js4317.aspx>. OFAC’s announcement also indicated that in 2004, the State Department had imposed sanctions against CPMIEC pursuant to the Iran Nonproliferation Act of 2000 for transferring equipment and technology to Iran that was either controlled under multilateral export

List with the bracketed suffix [NPWMD]. KWE did not check the SDN List (or any other screening list) in connection with either its preparation of the SED or the other arrangements it made relating to the export of the items to CPMIEC.

Pursuant to Section 744.8(a) of the Regulations, an EAR license is required for the export or reexport of any item subject to the EAR to any party listed in Appendix A to Chapter V of 31 C.F.R. with the bracketed suffix [NPWMD].⁶ U.S. persons who seek to export or reexport items subject to both the EAR and to OFAC's authority under Executive Order 13382 may seek authorization from OFAC in lieu of authorization from BIS. No authorization was sought or obtained from BIS or OFAC in connection with the export to CPMIEC described herein.

In causing, aiding, and/or abetting the export of the items to CPMIEC, a party listed in Appendix A to 31 C.F.R. Chapter V with the bracketed suffix [NPWMD], without the required U.S. Government authorization, KWE committed one violation of Section 764.2(b) of the Regulations.

WHEREAS, KWE has reviewed the Proposed Charging Letter and is aware of the allegations made against it and the administrative sanctions that could be imposed against it if the allegations are found to be true;

WHEREAS, KWE 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, KWE enters into this Agreement voluntarily and with full knowledge of its rights, after having consulted with counsel;

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

control regimes or which had the potential to make a material contribution to weapons of mass destruction. *Id.*

⁶ Section 744.8(c) of the Regulations provides that applications for EAR licenses under Section 744.8 generally will be denied.

WHEREAS, KWE neither admits nor denies the allegations contained in the Proposed Charging Letter; and

WHEREAS, KWE agrees to be bound by the Order, if issued;

NOW THEREFORE, the Parties hereby agree, for purposes of this Settlement Agreement, as follows:

1. BIS has jurisdiction over KWE, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.

2. The following sanction shall be imposed against KWE in complete settlement of the alleged violation of the Regulations relating to the transactions specifically detailed in the Proposed Charging Letter:

a. KWE shall be assessed a civil penalty in the amount of \$30,000, the payment of which shall be made to the U.S. Department of Commerce within 30 days of the date of the Order. Payment shall be made in the manner specified in the attached instructions.

d. The full and 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, license exception, permission, or privilege granted, or to be granted, to KWE. Failure to make full and timely payment of the civil penalty may result in the denial of all of KWE's export privileges under the Regulations for one year from the date of the failure to make such payment.

3. Subject to the approval of this Agreement pursuant to Paragraph 8 hereof, KWE 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 issued), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if issued; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued. KWE also waives and will not assert any Statute of Limitations defense, and the Statute of Limitations will be tolled, in connection with any violation of the Act or the Regulations arising out of the transactions identified in the Proposed Charging Letter or in connection with collection of the civil penalty or enforcement of this Agreement and the Order, if issued, from the date of the Order until the date KWE pays in full the civil penalty agreed to in Paragraph 2.a of this Agreement.

4. KWE shall not take any action or make or permit to be made any public statement, directly or indirectly, denying the allegations in the Proposed Charging Letter or the Order. The foregoing does not affect KWE's testimonial obligations in any proceeding; nor does it affect its right to take legal or factual positions in civil litigation or other civil proceedings in which the U.S. Department of Commerce is not a party.

5. BIS agrees that upon full and timely payment of the civil penalty as set forth in Paragraph 2.a, BIS will not initiate any further administrative proceeding against KWE in connection with any violation of the Act or the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter.

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(a) 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.

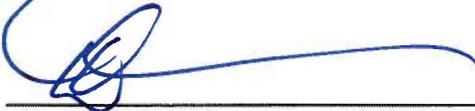
7. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, if issued; nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department 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 issuing 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. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, available to the public.

10. 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



Douglas R. Hassebrock
Director of Export Enforcement

KINTETSU WORLD EXPRESS (U.S.A.),
INC.

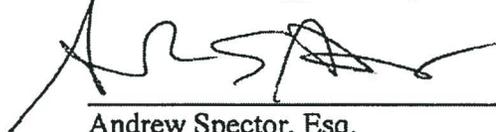


Nobutoshi Torii
President and Chief Operating Officer

Date: 23 Sep 14

Date: 09/17/2014

Reviewed and approved by:



Andrew Spector, Esq.
Spector Rubin, P.A.
Counsel for Kintetsu World Express (U.S.A.),
Inc.

Date: 9/18/2014

PROPOSED CHARGING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Kintetsu World Express (U.S.A.), Inc.
30 Murray Hill Parkway Suite 200
East Rutherford, New Jersey 07073

Attention: Nobutoshi Torii
President and Chief Operating Officer

Dear Mr. Torii:

The Bureau of Industry and Security, U.S. Department of Commerce ("BIS"), has reason to believe that Kintetsu World Express (U.S.A.), Inc., of East Rutherford, New Jersey ("KWE"), has committed one violation of the Export Administration Regulations (the "EAR" or "Regulations"),¹ which issued under the authority of the Export Administration Act of 1979 (the "Act").² Specifically, BIS charges that KWE committed the following violation:

Charge 1 15 C.F.R. § 764.2(b): Causing, Aiding, or Abetting an Act Prohibited by the Regulations

On one occasion, on or about May 23, 2010, KWE caused, aided, and/or abetted an act prohibited by the Regulations. Specifically, KWE, acting as a freight forwarder, facilitated the export of three spiral duct production machines and related accessories, items subject to the Regulations, designated EAR99,³ and valued at a figure of at least \$250,000, from the United States to China National Precision Machinery Import/Export Corporation ("CPMIEC") in Beijing, People's Republic of China, without the required U.S. Government authorization. KWE arranged for the shipment of the items to CPMIEC and filed a Shipper's Export Declaration ("SED") in the Automated Export System indicating that the export was designated "NLR" (No License Required).

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2014). The violation charged occurred in 2010. The Regulations governing the violation at issue are found in the 2010 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2010)). The 2014 Regulations govern the procedural aspects of this case.

² 50 U.S.C. app. §§ 2401-2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of August 7, 2014 (79 Fed. Reg. 46959 (Aug. 11, 2014)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, et seq. (2006 & Supp. IV 2010)).

³ EAR99 is a designation for items subject to the Regulations that are not listed on the Commerce Control List, which is set forth at Supplement No. 1 to Part 774 of the Regulations. 15 C.F.R. § 774.1 (2010).

CPMIEC is a party listed in Appendix A to 31 C.F.R. Chapter V with the bracketed suffix [NPWMD]. This appendix includes the list of Specially Designated Nationals and Blocked Persons (“SDN List”), administered by the Department of the Treasury’s Office of Foreign Assets Control (“OFAC”). The bracketed suffix [NPWMD] identifies parties whose property or interests in property are blocked pursuant to Executive Order 13382 of June 28, 2005 ((Blocking Property of Weapons of Mass Destruction Proliferators and Their Supporters) (70 Fed. Reg. 38,567 (July 1, 2005))). OFAC added CPMIEC to the SDN List with the bracketed suffix [NPWMD] on June 13, 2006,⁴ and announced that CPMIEC had supplied Iran's military and Iranian proliferators with missile-related dual-use items.⁵ At all relevant times hereto, CPMIEC remained a party listed on the SDN List with the bracketed suffix [NPWMD]. KWE did not check the SDN List (or any other screening list) in connection with either its preparation of the SED or the other arrangements it made relating to the export of the items to CPMIEC.

Pursuant to Section 744.8(a) of the Regulations, an EAR license is required for the export or reexport of any item subject to the EAR to any party listed in Appendix A to Chapter V of 31 C.F.R. with the bracketed suffix [NPWMD].⁶ U.S. persons who seek to export or reexport items subject to both the EAR and to OFAC’s authority under Executive Order 13382 may seek authorization from OFAC in lieu of authorization from BIS. No authorization was sought or obtained from BIS or OFAC in connection with the export to CPMIEC described herein.

In causing, aiding, and/or abetting the export of the items to CPMIEC, a party listed in Appendix A to 31 C.F.R. Chapter V with the bracketed suffix [NPWMD], without the required U.S. Government authorization, KWE committed one violation of Section 764.2(b) of the Regulations.

* * *

Accordingly, KWE 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 and any other liability sanction or penalty available

⁴ See <http://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20060613.aspx>; see also 71 Fed. Reg. 39,708 (July 13, 2006) (amending Appendix A to 31 C.F.R. Chapter V to reflect additions and deletions to the SDN List that had occurred as of June 26, 2006).

⁵ See <http://www.treasury.gov/press-center/press-releases/Pages/js4317.aspx>. OFAC’s announcement also indicated that in 2004, the State Department had imposed sanctions against CPMIEC pursuant to the Iran Nonproliferation Act of 2000 for transferring equipment and technology to Iran that was either controlled under multilateral export control regimes or which had the potential to make a material contribution to weapons of mass destruction. *Id.*

⁶ Section 744.8(c) of the Regulations provides that applications for EAR licenses under Section 744.8 generally will be denied.

under law, including, but not limited to any or all of the following:

- The maximum civil penalty allowed by law of up to the greater of \$250,000 per violation or twice the value of the transaction that is the basis of the violation;⁷
- Denial of export privileges;
- Exclusion from practice before BIS; and/or
- Any other liability, sanction, or penalty available under law.

If KWE fails to answer the charge 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. *See* 15 C.F.R. §§ 766.6 and 766.7. If KWE defaults, the Administrative Law Judge may find the charge alleged in this letter is true without a hearing or further notice to KWE. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty for the charge in this letter.

KWE is further notified that it is entitled to an agency hearing on the record if it files a written demand for one with its answer. *See* 15 C.F.R. § 766.6. KWE is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent it. *See* 15 C.F.R. §§ 766.3(a) and 766.4.

The Regulations provide for settlement without a hearing. *See* 15 C.F.R. § 766.18. Should KWE have a proposal to settle this case, KWE or its representative should transmit it to the attorney representing BIS named below.

KWE is further notified that under the Small Business Regulatory Enforcement Flexibility Act, KWE may be eligible for assistance from the Office of the National Ombudsman of the Small Business Administration in this matter. To determine eligibility and get more information, please see: <http://www.sba.gov/ombudsman/>.

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

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

⁷ *See* International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

In addition, a copy of KWE's answer must be served on BIS at the following address:

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

Parvin R. Huda is the attorney representing BIS in this case; any communications that KWE may wish to have concerning this matter should occur through her. Ms. Huda may be contacted by telephone at (202) 482-5301.

Sincerely,

Douglas R. Hassebrock
Director
Office of Export Enforcement