

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

Eric Carlson
105 Pristine Court
Summerville, SC 29485

and

c/o Streit USA Armoring, LLC
8449 Palmetto Commerce Parkway
North Charleston, SC 29456

Respondent

ORDER RELATING TO ERIC CARLSON

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Eric Carlson (“Carlson”), of Summerville and North Charleston, SC (“Carlson”), of its intention to initiate an administrative proceeding against Carlson 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 Carlson that alleges that Carlson violated 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 (2015). The charged violation occurred in 2009. The Regulations governing the violation at issue are found in the 2009 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774). The 2015 version of the 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 13,222 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, 2015 (80 Fed. Reg. 48,233 (Aug. 11, 2015)), 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, and Abetting a False Statement to BIS in connection with a License Application

In or about January-February 2009, Carlson engaged in conduct prohibited by the Regulations by causing, aiding, abetting, counseling, commanding, inducing and/or permitting a false or misleading statement to BIS in connection with the submission of a license application, an “export control document” as defined in Section 772.1 of the Regulations. Streit USA, where Carlson was at all times pertinent hereto a director and its vice president, operations, had filed an application with BIS on November 20, 2008, seeking a license to export 25 armored vehicles from the United States to Venezuela. The items were subject to the Regulations and classified under Export Control Classification Number (“ECCN”) 9A018.

On January 16, 2009, as part of the interagency license application review process, BIS forwarded certain questions about the application to Streit USA, which Streit USA forwarded to its parent company, Streit Group FZE. Streit Group FZE’s international sales manager responded later the same day, stating, “Regarding the request for additional information . . . I think we should advise the Dept[.] of Commerce that the client[’]s deadline for importing the vehicles has expired as they needed them by December 31st. We don’t want to bring any unnecessary attention and they may ask for more information or even . . . contact the client.” On or about January 20, 2009, Carlson responded by email to Streit Group FZE’s international sales manager, as well as to Guerman Goutorov, the chairman and chief executive officer at all pertinent times of both Streit Group FZE and Streit USA, stating, “We can advise the Commerce Department that the customer went elsewhere to purchase their armored vehicles due to the fact that it took too long for us to get an export license.”

Consistent with this scheme and the response proposed by Carlson, Streit USA falsely stated to BIS on or about February 2, 2009, that the sale had been lost and that the license application should be returned without action. This false statement violated Section 764.2(g) of the Regulations, which prohibits, inter alia, the making of any false or misleading statement or representation to BIS in connection with a license application. Carlson knew not only that the sale had not been lost, but also had known for at least approximately six weeks that Streit USA had exported nine of the armored vehicles identified in the license application to Venezuela via Canada on or about December 10, 2008, including because Carlson had received an email on December 11, 2008, that discussed the export of the vehicles, which were valued at approximately \$753,840, the prior day.

In so doing, Carlson committed one violation of Section 764.2(b) of the Regulations.

WHEREAS, BIS and Carlson 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, Carlson shall be assessed a civil penalty in the amount of \$50,000.

Carlson shall pay the U.S. Department of Commerce in five installments of: \$10,000 not later than September 27, 2015; \$10,000 not later than April 27, 2016; \$10,000 not later than November 27, 2016; \$10,000 not later than June 27, 2017; and \$10,000 not later than January 27, 2018. Payment shall be made in the manner specified in the attached instructions. If any of the five installment payments is not fully and timely made, any remaining scheduled installment payments may become due and owing immediately.

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, Carlson 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 full and 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 Carlson.

FOURTH, that for a period of three (3) years from the date of this Order, Carlson, with last known addresses of: 105 Pristine Court, Summerville, SC 29485; and c/o Streit USA Armoring, LLC, 8449 Palmetto Commerce Parkway, North Charleston, SC 29456, and when acting for or on his behalf, his successors, assigns, representatives, agents, or employees (hereinafter collectively referred to as "Denied Person"), may not, directly or

indirectly, participate 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. Benefitting 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 the Denied Person 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.

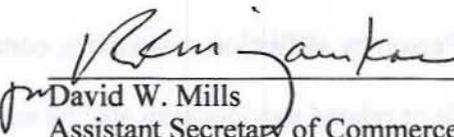
SEVENTH, that, as authorized by Section 766.18(c) of the Regulations, the three-year denial period set forth above shall be suspended during a probationary period of three years under this Order, and shall thereafter be waived, provided that Carlson has made full and timely payment of the civil penalty as set forth above and has committed

no other violation of the Act or the Regulations or any order, license or authorization issued thereunder. If Carlson does not make full and timely payment as set forth above, or commits another violation of the Act or Regulations or any order, license or authorization issued thereunder during the three-year probationary period under this Order, the suspension may be modified or revoked by BIS and a denial order, including a three-year denial period, activated against Carlson.

EIGHTH, Carlson 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 Carlson's testimonial obligations in any proceeding, nor does it affect his 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.

NINTH, 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 15th day of September, 2015.

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

In the Matter of:

Eric Carlson
105 Pristine Court
Summerville, SC 29485

and

c/o Streit USA Armoring, LLC
8449 Palmetto Commerce Parkway
North Charleston, SC 29456

Respondent

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Eric Carlson (“Carlson”), of Summerville and North Charleston, SC, 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

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

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2015). The charged violation occurred in 2009. The Regulations governing the violation at issue are found in the 2009 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774). The 2015 version of the 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, 2015 (80 Fed. Reg. 48,233 (Aug. 11, 2015)), 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 issued a Proposed Charging Letter to Carlson that alleges that Carlson violated the Regulations, as follows:

Charge 1: 15 C.F.R. §764.2(b) – Causing, Aiding, and Abetting a False Statement to BIS in connection with a License Application

In or about January-February 2009, Carlson engaged in conduct prohibited by the Regulations by causing, aiding, abetting, counseling, commanding, inducing and/or permitting a false or misleading statement to BIS in connection with the submission of a license application, an “export control document” as defined in Section 772.1 of the Regulations. Streit USA, where Carlson was at all times pertinent hereto a director and its vice president, operations, had filed an application with BIS on November 20, 2008, seeking a license to export 25 armored vehicles from the United States to Venezuela. The items were subject to the Regulations and classified under Export Control Classification Number (“ECCN”) 9A018.

On January 16, 2009, as part of the interagency license application review process, BIS forwarded certain questions about the application to Streit USA, which Streit USA forwarded to its parent company, Streit Group FZE. Streit Group FZE’s international sales manager responded later the same day, stating, “Regarding the request for additional information . . . I think we should advise the Dept[.] of Commerce that the client[']s deadline for importing the vehicles has expired as they needed them by December 31st. We don’t want to bring any unnecessary attention and they may ask for more information or even . . . contact the client.” On or about January 20, 2009, Carlson responded by email to Streit Group FZE’s international sales manager, as well as to Guerman Goutorov, the chairman and chief executive officer at all pertinent times of both Streit Group FZE and Streit USA, stating, “We can advise the Commerce Department that the customer went elsewhere to purchase their armored vehicles due to the fact that it took too long for us to get an export license.”

Consistent with this scheme and the response proposed by Carlson, Streit USA falsely stated to BIS on or about February 2, 2009, that the sale had been lost and that the license application should be returned without action. This false statement violated Section 764.2(g) of the Regulations, which prohibits, inter alia, the making of any false or misleading statement or representation to BIS in connection with a license application. Carlson knew not only that the sale had not been lost, but also had known for at least approximately six weeks that Streit USA had exported nine of the armored vehicles identified in the license application to Venezuela via Canada on or about December 10, 2008, including because Carlson had received an email on December 11, 2008, that discussed the export of the vehicles, which were valued at approximately \$753,840, the prior day.

In so doing, Carlson committed one violation of Section 764.2(b) of the Regulations.



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

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

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

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

WHEREAS, Carlson 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 Carlson, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.

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

a. Carlson shall be assessed a civil penalty in the amount of \$50,000.

Carlson shall pay the U.S. Department of Commerce in five installments of:

\$10,000 not later than September 27, 2015; \$10,000 not later than April 27, 2016;

\$10,000 not later than November 27, 2016; \$10,000 not later than June 27, 2017; and \$10,000 not later than January 27, 2018. Payment shall be made in the manner specified in the attached instructions. If any of the five installment payments is not fully and timely made, any remaining scheduled installment payments may become due and owing immediately.

b. 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 Carlson.

c. For a period of three (3) years from the date of the Order, Eric Carlson, with last known addresses of: 105 Pristine Court, Summerville, SC 29485; and c/o Streit USA Armoring LLC, 8449 Palmetto Commerce Parkway, North Charleston, SC 29456, and when acting for or on his behalf, his successors, assigns, representatives, agents, or employees (hereinafter collectively referred to as "Denied Person"), may not, directly or indirectly, participate 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 other activity subject to the Regulations; or

iii. Benefitting 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.

d. BIS agrees that, as authorized by Section 766.18(c) of the Regulations, the three-year denial period set forth in Paragraph 2.c shall be suspended during a probationary period of three years under the Order, and shall thereafter be waived, provided that Carlson has made full and timely payment of the civil penalty in accordance with Paragraph 2.a above and has committed no other violation of the Act or the Regulations or any order, license or authorization issued thereunder. If Carlson does not make full and timely payment in accordance with Paragraph 2.a above, or commits another violation of the Act or the Regulations or any order, license or authorization issued thereunder during the three-year probationary period under the Order, the suspension may be modified or revoked by BIS and a denial order, including a three-year denial period, activated against Carlson.

3. Subject to the approval of this Agreement pursuant to Paragraph 8 hereof, Carlson 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,

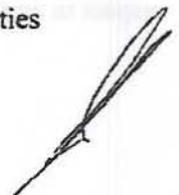


without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if issued; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued. Carlson 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 transaction 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 Carlson pays in full the civil penalty agreed to in Paragraph 2.a of this Agreement.

4. Carlson 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 Carlson's testimonial obligations in any proceeding, nor does it affect his 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 above, BIS will not initiate any further administrative proceeding against Carlson in connection with any violation of the Act or the Regulations arising out of the transaction 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.

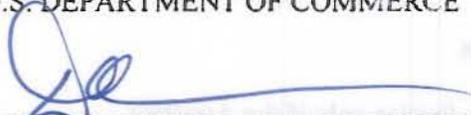
8. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement approves it by issuing the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

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

ERIC CARLSON



Eric Carlson
Date: August 24, 2015

Date: August 31, 2015

Reviewed and approved by:



Jason Waite, Esq.
Alston & Bird LLP
Counsel for Eric Carlson

Date: August 25th, 2015

PROPOSED CHARGING LETTER

REGISTERED MAIL - RETURN RECEIPT REQUESTED

Mr. Eric Carlson
President
Streit USA Armoring, LLC
8449 Palmetto Commerce Parkway
North Charleston, SC 29456

Dear Mr. Carlson:

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that you, Eric Carlson (“Carlson”), in your individual capacity, have committed one violation 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 you committed the following violation:

Charge 1: 15 C.F.R. §764.2(b) – Causing, Aiding, and Abetting a False Statement to BIS in connection with a License Application

In or about January-February 2009, Carlson engaged in conduct prohibited by the Regulations by causing, aiding, abetting, counseling, commanding, inducing and/or permitting a false or misleading statement to BIS in connection with the submission of a license application, an “export control document” as defined in Section 772.1 of the Regulations. Streit USA, where Carlson was at all times pertinent hereto a director and its vice president, operations, had filed an application with BIS on November 20, 2008, seeking a license to export 25 armored vehicles from the United States to Venezuela. The items were subject to the Regulations and classified under Export Control Classification Number (“ECCN”) 9A018.

On January 16, 2009, as part of the interagency license application review process, BIS forwarded certain questions about the application to Streit USA, which Streit USA forwarded to its parent company, Streit Group FZE. Streit Group FZE’s international sales manager responded later the same day, stating, “Regarding the request for additional information . . . I think we should advise the Dept[.] of Commerce that the client[’]s deadline for importing the

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2015). The charged violation occurred in 2009. The Regulations governing the violation at issue are found in the 2009 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2009)). The 2015 version of the Regulations establish the procedures that currently 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 13,222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), as extended most recently by the Notice of August 7, 2014 (79 Fed. Reg. 46,959 (Aug. 11, 2014)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 *et seq.* (2000)).

vehicles has expired as they needed them by December 31st. We don't want to bring any unnecessary attention and they may ask for more information or even . . . contact the client." On or about January 20, 2009, Carlson responded by email to Streit Group FZE's international sales manager, as well as to Guerman Goutorov, the chairman and chief executive officer at all pertinent times of both Streit Group FZE and Streit USA, stating, "We can advise the Commerce Department that the customer went elsewhere to purchase their armored vehicles due to the fact that it took too long for us to get an export license."

Consistent with this scheme and the response proposed by Carlson, Streit USA falsely stated to BIS on or about February 2, 2009, that the sale had been lost and that the license application should be returned without action. This false statement violated Section 764.2(g) of the Regulations, which prohibits, inter alia, the making of any false or misleading statement or representation to BIS in connection with a license application. Carlson knew not only that the sale had not been lost, but also had known for at least approximately six weeks that Streit USA had exported nine of the armored vehicles identified in the license application to Venezuela via Canada on or about December 10, 2008, including because Carlson had received an email on December 11, 2008, that discussed the export of the vehicles, which were valued at approximately \$753,840, the prior day.

In so doing, Carlson committed one violation of Section 764.2(b) of the Regulations.

* * * * *

Accordingly, Carlson 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 the greater of \$250,000 per violation or twice the value of the transaction that is the basis of the violation;³
- Denial of export privileges;
- Exclusion from practice before BIS; and/or
- Any other liability, sanction, or penalty available under law.

If Carlson 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. See 15 C.F.R. §§ 766.6 and 766.7. If Carlson defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Carlson. The Under Secretary of

³ International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

Commerce for Industry and Security may then impose up to the maximum penalty for the charges in this letter.

Carlson is further notified that he is entitled to an agency hearing on the record if he files a written demand for one with his answer. *See* 15 C.F.R. § 766.6. Carlson is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent him. *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 Carlson have a proposal to settle this case, Carlson or his representative should transmit it to the attorney representing BIS named below.

Carlson is further notified that under the Small Business Regulatory Enforcement Flexibility Act, Carlson 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, Carlson'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

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

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

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

Sincerely,

Douglas R. Hassebrock
Director
Office of Export Enforcement