

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

In the Matter of:)
)
Flowserve Corporation)
5215 N. O'Connor Blvd)
Suite 2300)
Irving, TX 75039)
)
Respondent)

ORDER RELATING TO FLOWSERVE CORPORATION

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Flowserve Corporation (“Flowserve US”) of its intention to initiate an administrative proceeding against Flowserve US 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 Flowserve US that alleged that Flowserve US committed 60 violations of the Regulations. Specifically, these charges are:

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2011). The charged violations occurred between 2002 and 2008. The Regulations governing the violations at issue are found in the 2002-2008 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2002-2008)). The 2011 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 12, 2011 (76 Fed. Reg. 50,661 (Aug. 16, 2011)), continues the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*).

Charges 1-55 15 C.F.R. § 764.2(a) - Engaging in Prohibited Conduct by Exporting Pumps, Valves and Pump and Valve Components Controlled for Chemical and Biological Weapons Proliferation Reasons Without the Required Government Authorizations

On 55 occasions between on or about October 11, 2002, and on or about September 23, 2008, Flowserve US engaged in conduct prohibited by the Regulations by exporting pumps, valves and pump and valve component parts, items classified under Export Control Classification Number (“ECCN”) 2B350, controlled for Chemical and Biological Weapons Proliferation reasons, and valued at approximately \$860,000, from the United States to Aruba, Brazil, Chile, the Netherlands Antilles, Hong Kong, Israel, Mexico, the People’s Republic of China, Saudi Arabia, Singapore, South Africa, Taiwan, Thailand, Trinidad and Tobago, and Venezuela, without the Department of Commerce licenses required by Section 742.2(a) of the Regulations. In so doing, Flowserve US committed 55 violations of Section 764.2(a) of the Regulations.

Charges 56-60 15 C.F.R. §764.2(i) – Failure to Comply with Reporting Requirements

On five occasions between on or about February 14, 2006 and on or about April 1, 2007, Flowserve US failed to comply with a reporting requirement of the Regulations. On these five occasions, Flowserve US exported spare parts for pumps, items subject to the Regulations, designated EAR99³ and valued at approximately \$5,505, from the United States to Libya via Italy for the purpose of servicing items subject to the Regulations that may have been illegally exported or reexported to Libya during or before the comprehensive embargo on Libya ended, which was on April 29, 2004 (i.e., “installed base” items). In connection with these exports, pursuant to Section 764.7(b)(ii) of the Regulations, Flowserve US was required to file reports with BIS’ Office of Export Enforcement identifying “all known material facts with respect to how the installed base item arrived in Libya”. Such reports were due within ninety days “of the first activity relating to the installed base item in Libya”. Flowserve US failed to file the reports required by Section 764.7 associated with each of these exports. In so doing, Flowserve US committed five violations of Section 764.2(a) of the Regulations.

WHEREAS, BIS and Flowserve US 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;

³ EAR99 is a designation for items subject to the Regulations, but not listed on the Commerce Control List. 15 C.F.R. § 743.3(c) (2006, 2007).

IT IS THEREFORE ORDERED:

FIRST, Flowserve US shall be assessed a civil penalty in the amount of \$725,000, which shall be paid to the U.S. Department of Commerce within 30 days of the date of this Order.

Payment shall be made in the manner specified in the attached instructions.

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, Flowserve US 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.

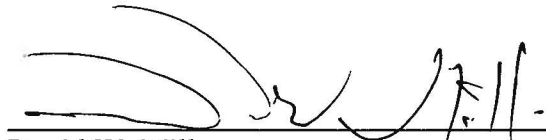
THIRD, Flowserve US shall complete an external audit of its export controls compliance program, as set forth in this paragraph. Flowserve US shall hire an unaffiliated third party consultant with expertise in U.S. export control laws to conduct the external audit of its compliance with U.S. export control laws (including recordkeeping requirements), with respect to all exports or re-exports that are subject to the Regulations. The results of the audit, including any relevant supporting materials, shall be submitted to the Department of Commerce, Bureau of Industry and Security, Office of Export Enforcement, 525 South Griffin Street, Room 622, Dallas, TX 75202 (“BIS Dallas Field Office”). The audit shall cover the 12-month period beginning on the date of this Order, and the related report shall be due to the BIS Dallas Field Office no later than fifteen (15) months from the date of this Order. Said audit shall be in substantial compliance with the EMS sample audit module, and shall include an assessment of Flowserve US’s compliance with the Regulations. The EMS sample audit module is available on the BIS web site at http://www.bis.doc.gov/complianceandenforcement/revise_emcp_audit.pdf. In addition, where said audit identifies actual or potential violations of the Regulations, Flowserve US must

promptly provide copies of the pertinent air waybills and other export control documents and supporting documentation to the BIS Dallas Field Office.

FOURTH, that the full and timely payment of the civil penalty in accordance with the payment schedule set forth above, and the timely completion and submission of the results of the audit set forth above, are hereby made conditions to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Flowserve US. Accordingly, if Flowserve US should fail to pay the civil penalty in full or in a timely manner or fail to complete and submit the results of the audit in a timely manner, the undersigned may issue an Order denying all of Flowserve US's export privileges under the Regulations for a period of one year from, respectively, the date the penalty payment is due or the date by which the results of the completed audit are to be submitted.

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 29 day of September, 2011.

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

In the Matter of:)
)
Flowserve Corporation)
5215 N. O'Connor Blvd)
Suite 2300)
Irving, TX 75039)
)
Respondent)

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Flowserve Corporation (“Flowserve US”) 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 Flowserve US of its intention to initiate an administrative proceeding against it, 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 (2011). The charged violations occurred between 2002 and 2008. The Regulations governing the violations at issue are found in the 2002-2008 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2002-2008)). The 2011 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 12, 2011 (76 Fed. Reg. 50,661 (Aug. 16, 2011)), continues the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*).

WHEREAS, BIS has issued a Proposed Charging letter to Flowserve US that alleges that Flowserve US committed 60 violations of the Regulations, specifically:

Charges 1-55 15 C.F.R. § 764.2(a) - Engaging in Prohibited Conduct by Exporting Pumps, Valves and Pump and Valve Components Controlled for Chemical and Biological Weapons Proliferation Reasons Without the Required Government Authorizations

On 55 occasions between on or about October 11, 2002, and on or about September 23, 2008, Flowserve US engaged in conduct prohibited by the Regulations by exporting pumps, valves and pump and valve component parts, items classified under Export Control Classification Number (“ECCN”) 2B350, controlled for Chemical and Biological Weapons Proliferation reasons, and valued at approximately \$860,000, from the United States to Aruba, Brazil, Chile, the Netherlands Antilles, Hong Kong, Israel, Mexico, the People’s Republic of China, Saudi Arabia, Singapore, South Africa, Taiwan, Thailand, Trinidad and Tobago, and Venezuela, without the Department of Commerce licenses required by Section 742.2(a) of the Regulations. In so doing, Flowserve US committed 55 violations of Section 764.2(a) of the Regulations.

Charges 56-60 15 C.F.R. §764.2(i) – Failure to Comply with Reporting Requirements

On five occasions between on or about February 14, 2006 and on or about April 1, 2007, Flowserve US failed to comply with a reporting requirement of the Regulations. On these five occasions, Flowserve US exported spare parts for pumps, items subject to the Regulations, designated EAR99³ and valued at approximately \$5,505, from the United States to Libya via Italy for the purpose of servicing items subject to the Regulations that may have been illegally exported or reexported to Libya during or before the comprehensive embargo on Libya ended, which was on April 29, 2004 (i.e., “installed base” items). In connection with these exports, pursuant to Section 764.7(b)(ii) of the Regulations, Flowserve US was required to file reports with BIS’ Office of Export Enforcement identifying “all known material facts with respect to how the installed base item arrived in Libya”. Such reports were due within ninety days “of the first activity relating to the installed base item in Libya”. Flowserve US failed to file the reports required by Section 764.7 associated with each of these exports. In so doing, Flowserve US committed five violations of Section 764.2(a) of the Regulations.

³ EAR99 is a designation for items subject to the Regulations, but not listed on the Commerce Control List. 15 C.F.R. § 743.3(c) (2006, 2007).

WHEREAS, Flowserve US filed a voluntary self-disclosure with BIS's Office of Export Enforcement;

WHEREAS, Flowserve US has reviewed the Proposed 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, Flowserve US 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, Flowserve US enters into this Agreement voluntarily and with full knowledge of its rights after having consulted with counsel;

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

WHEREAS, Flowserve US neither admits nor denies the allegations contained in the Proposed Charging Letter;

WHEREAS, Flowserve US wishes to settle and dispose of all matters alleged in the Proposed Charging Letter by entering into this Agreement; and

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

NOW THEREFORE, the Parties hereby agree as follows:

1. BIS has jurisdiction under the Regulations in connection with the matters alleged in the Proposed Charging Letter.
2. The following sanctions shall be imposed against Flowserve US in complete settlement of the alleged violations of the Regulations relating to the transactions specifically detailed in the Proposed Charging Letter:

a. Flowserve US shall be assessed a civil penalty in the amount of \$725,000, 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.

b. Flowserve US shall complete an external audit of its export controls compliance program. Flowserve US shall hire an unaffiliated third party consultant with expertise in U.S. export control laws to conduct the external audit of its compliance with U.S. export control laws (including recordkeeping requirements), with respect to all exports or re-exports that are subject to the Regulations. The results of the audit, including any relevant supporting materials, shall be submitted to the Department of Commerce, Bureau of Industry and Security, Office of Export Enforcement, 525 South Griffin Street, Room 622, Dallas, TX 75202 ("BIS Dallas Field Office"). The audit shall cover the 12-month period beginning on the date of the Order, and the related report shall be due to the BIS Dallas Field Office no later than fifteen (15) months from the date of the Order. Said audit shall be in substantial compliance with the EMS sample audit module, and shall include an assessment of Flowserve US's compliance with the Regulations. The EMS sample audit module is available on the BIS web site at http://www.bis.doc.gov/complianceandenforcement/revised_emcp_audit.pdf. In addition, where said audit identifies actual or potential violations of the Regulations, Flowserve US must promptly provide copies of the pertinent air waybills and other export control documents and supporting documentation to the BIS Dallas Field Office.

c. The full and timely payment of the civil penalty agreed to in paragraph 2.a, above, and the timely completion and submission of the results of the audit agreed to in paragraph 2.b, above, are hereby made conditions to the granting, restoration, or continuing validity of any export license, permission, or privilege granted, or to be granted, to Flowserve US. Failure to make full or timely payment of the civil penalty set forth above may result in the denial of all of Flowserve US's export privileges for a period of one year from the date on which the payment is due. Failure to complete and submit the results of the audit agreed to in paragraph 2.b, above, within the deadline established in that paragraph also may result in the denial of all of Flowserve US's export privileges for a period of one year from the date on which the results of the completed audit are to be submitted.

3. Subject to the approval of this Agreement pursuant to paragraph 8 hereof, Flowserve US 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 entered; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued. Flowserve US also waives and will not assert any Statute of Limitations defense, and the Statute of Limitations will be tolled, for the time period from the date of the Order, if issued, until the later of the date Flowserve US pays in full the civil penalty agreed to in Paragraph 2.a of this Agreement or the date

Flowserve US submits the results of the completed compliance audit agreed to in Paragraph 2.b of this Agreement, 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 the Agreement and Order, if issued.

4. BIS agrees that upon full and timely payment of the civil penalty as set forth in Paragraph 2.a above, and timely completion and submission of the results of the audit as set forth in Paragraph 2.b above, BIS will not initiate any further administrative proceedings against Flowserve US in connection with any violation of the Act or the Regulations arising out of the transactions specifically detailed in the voluntary self-disclosure and the Proposed Charging Letter.

5. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, 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(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. 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
Office of Export Enforcement

Date: 9/27/11

FLOWSERVE CORPORATION



Ronald F. Shuff
Senior Vice President and General Counsel

Date: 9-23-11

PROPOSED CHARGING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Flowserve Corporation
5215 N. O'Connor Blvd
Suite 2300
Irving, TX 75039

Attention: Ronald F. Shuff, Senior Vice President and General Counsel

Dear Mr. Shuff:

The Bureau of Industry and Security, United States Department of Commerce ("BIS"), has reason to believe that Flowserve Corporation, of Irving, Texas ("Flowserve US"), committed 60 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 Flowserve US committed the following violations:

Charges 1-55 15 C.F.R. § 764.2(a) - Engaging in Prohibited Conduct by Exporting Pumps, Valves and Pump and Valve Components Controlled for Chemical and Biological Weapons Proliferation Reasons Without the Required Government Authorizations

As described in greater detail in the attached Schedule of Violations, which is incorporated herein by reference, on 55 occasions between on or about October 11, 2002, and on or about September 23, 2008, Flowserve US engaged in conduct prohibited by the Regulations by exporting pumps, valves and pump and valve component parts, items classified under Export Control Classification Number ("ECCN") 2B350, controlled for Chemical and Biological Weapons Proliferation reasons, and valued at approximately \$860,000, from the United States to Aruba, Brazil, Chile, the Netherlands Antilles, Hong Kong, Israel, Mexico, the People's Republic of China, Saudi Arabia, Singapore, South Africa, Taiwan, Thailand, Trinidad and Tobago, and Venezuela, without the Department of Commerce licenses required by Section 742.2(a) of the Regulations. In so doing, Flowserve US committed 55 violations of Section 764.2(a) of the Regulations.

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2011). The charged violations occurred between 2002 and 2008. The Regulations governing the violations at issue are found in the 2002 through 2008 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2002-2008)). The 2011 Regulations establish 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 12, 2011 (76 Fed. Reg. 50,661 (Aug. 16, 2011)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*).

Charges 56-60 15 C.F.R. §764.2(i) – Failure to Comply with Reporting Requirements

As described in greater detail in the attached Schedule of Violations, which is incorporated herein by reference, on five occasions between on or about February 14, 2006 and on or about April 1, 2007, Flowserve US failed to comply with a reporting requirement of the Regulations. On these five occasions, Flowserve US exported spare parts for pumps, items subject to the Regulations, designated EAR99³ and valued at approximately \$5,505, from the United States to Libya via Italy for the purpose of servicing items subject to the Regulations that may have been illegally exported or reexported to Libya during or before the comprehensive embargo on Libya ended, which was on April 29, 2004 (i.e., “installed base” items). In connection with these exports, pursuant to Section 764.7(b)(ii) of the Regulations, Flowserve US was required to file reports with BIS’ Office of Export Enforcement identifying “all known material facts with respect to how the installed base item arrived in Libya”. Such reports were due within ninety days “of the first activity relating to the installed base item in Libya”. Flowserve US failed to file the reports required by Section 764.7 associated with each of these exports. In so doing, Flowserve US committed five violations of Section 764.2(a) of the Regulations.

* * * * *

Accordingly, Flowserve US is hereby notified that an administrative proceeding is instituted against it pursuant to 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 violation⁴;
- Denial of export privileges; and/or
- Exclusion from practice before BIS.

If Flowserve US 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 (2011). If Flowserve US defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Flowserve US. The Under Secretary for Industry and Security may then impose up to the maximum penalty on the charges in this letter.

³ EAR99 is a designation for items subject to the Regulations, but not listed on the Commerce Control List. 15 C.F.R. § 743.3(c) (2006, 2007).

⁴ International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

Flowserve US 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 (2011). Flowserve US 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 (2011).

Flowserve US is further notified that under the Small Business Regulatory Enforcement Flexibility Act, Flowserve US 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 Regulations provide for settlement without a hearing. *See* 15 C.F.R. § 766.18 (2011). Should Flowserve US have a proposal to settle this case, Flowserve US or its representative should transmit it to 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, Flowserve US's answer must be filed in accordance with the instructions set forth 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 Flowserve US's answer must be served on BIS at the following address:

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

Greg Michelsen and Elias Wolfberg are the attorneys representing BIS in this case; any communications that Flowserve US may wish to have concerning this matter should occur through them. Mr. Michelsen and Mr. Wolfberg may be contacted by telephone at (202) 482-5301.

Sincerely,

Douglas R. Hassebrock
Director
Office of Export Enforcement

Enclosure

**Flowserve Corporation
Proposed Charging Letter
Schedule of Violations**

Violation Number	Export Date	Item	ECCN	Destination	Violation
1	9/23/08	Pump and pump components	2B350	Brazil	15 C.F.R. §764.2(a)
2	7/18/03	Pump and pump components	2B350	China	15 C.F.R. §764.2(a)
3	12/31/04	Pump and pump components	2B350	China	15 C.F.R. §764.2(a)
4	5/3/06	Pump and pump components	2B350	Singapore	15 C.F.R. §764.2(a)
5	8/9/04	Pump and pump components	2B350	Taiwan	15 C.F.R. §764.2(a)
6	12/10/04	Pump and pump components	2B350	Taiwan	15 C.F.R. §764.2(a)
7	2/24/05	Pump and pump components	2B350	Taiwan	15 C.F.R. §764.2(a)
8	6/8/05	Pump and pump components	2B350	Taiwan	15 C.F.R. §764.2(a)
9	3/31/06	Pump and pump components	2B350	Taiwan	15 C.F.R. §764.2(a)
10	8/28/06	Pump and pump components	2B350	Taiwan	15 C.F.R. §764.2(a)
11	11/18/05	Pump and pump components	2B350	Thailand	15 C.F.R. §764.2(a)
12	1/16/06	Pump and pump components	2B350	Thailand	15 C.F.R. §764.2(a)
13	3/31/06	Pump and pump components	2B350	Thailand	15 C.F.R. §764.2(a)
14	5/29/03	Valves and valve components	2B350	Israel	15 C.F.R. §764.2(a)
15	10/25/05	Valves and valve components	2B350	Singapore	15 C.F.R. §764.2(a)
16	10/25/05	Valves and valve components	2B350	Singapore	15 C.F.R. §764.2(a)
17	10/11/02	Valves and valve components	2B350	Taiwan	15 C.F.R. §764.2(a)
18	12/15/05	Pump and pump components	2B350	Aruba	15 C.F.R. §764.2(a)
19	1/19/06	Pump and pump components	2B350	Aruba	15 C.F.R. §764.2(a)
20	8/30/05	Pump and pump components	2B350	Singapore	15 C.F.R. §764.2(a)
21	6/1/06	Pump and pump components	2B350	Singapore	15 C.F.R. §764.2(a)
22	4/21/06	Pump and pump components	2B350	Trinidad	15 C.F.R. §764.2(a)
23	11/4/05	Pump and pump components	2B350	Chile	15 C.F.R. §764.2(a)
24	11/28/05	Pump and pump components	2B350	Chile	15 C.F.R. §764.2(a)
25	12/6/05	Pump and pump components	2B350	Chile	15 C.F.R. §764.2(a)
26	12/30/05	Pump and pump components	2B350	Chile	15 C.F.R. §764.2(a)
27	5/17/05	Pump and pump components	2B350	Curacao	15 C.F.R. §764.2(a)
28	1/30/03	Pump and pump components	2B350	Israel	15 C.F.R. §764.2(a)
29	2/9/04	Pump and pump components	2B350	Saudi Arabia	15 C.F.R. §764.2(a)
30	5/22/07	Pump and pump components	2B350	Singapore	15 C.F.R. §764.2(a)
31	5/25/05	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
32	9/15/05	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
33	11/17/05	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
34	2/28/06	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
35	5/11/06	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
36	9/25/06	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
37	10/19/06	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
38	11/16/06	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
39	11/17/06	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
40	11/22/06	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)

Violation Number	Export Date	Item	ECCN	Destination	Violation
41	12/21/06	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
42	12/29/06	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
43	12/29/06	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
44	5/31/07	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
45	7/20/07	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
46	8/31/07	Pump and pump components	2B350	Venezuela	15 C.F.R. §764.2(a)
47	1/7/08	Valves and valve components	2B350	Hong Kong	15 C.F.R. §764.2(a)
48	12/13/06	Valves and valve components	2B350	Venezuela	15 C.F.R. §764.2(a)
49	12/4/07	Valves and valve components	2B350	China	15 C.F.R. §764.2(a)
50	11/7/05	Valves and valve components	2B350	Mexico	15 C.F.R. §764.2(a)
51	6/13/05	Valves and valve components	2B350	Singapore	15 C.F.R. §764.2(a)
52	8/31/05	Valves and valve components	2B350	Singapore	15 C.F.R. §764.2(a)
53	2/23/06	Valves and valve components	2B350	Singapore	15 C.F.R. §764.2(a)
54	5/31/05	Valves and valve components	2B350	South Africa	15 C.F.R. §764.2(a)
55	4/9/03	Valves and valve components	2B350	Taiwan	15 C.F.R. §764.2(a)
56	2/14/06	Spare parts for pumps	EAR99	Libya	15 C.F.R. §764.2(i)
57	5/17/06	Spare parts for pumps	EAR99	Libya	15 C.F.R. §764.2(i)
58	9/15/06	Spare parts for pumps	EAR99	Libya	15 C.F.R. §764.2(i)
59	12/11/06	Spare parts for pumps	EAR99	Libya	15 C.F.R. §764.2(i)
60	4/1/07	Spare parts for pumps	EAR99	Libya	15 C.F.R. §764.2(i)