

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

In the Matter of:

Jaguar Imports, LLC
7503 Exchange Drive
Orlando, Florida

Respondent

ORDER RELATING TO JAGUAR IMPORTS, LLC

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Jaguar Imports, LLC, of Orlando, Florida (“Jaguar Imports”), of its intention to initiate an administrative proceeding against Jaguar Imports pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),¹ through the issuance of a Proposed Charging Letter to Jaguar Imports that alleges that Jaguar Imports committed twelve violations of the Regulations.² Specifically, the charges are:

¹ The Regulations originally issued under the Export Administration Act of 1979, as amended, 50 U.S.C. §§ 4601-4623 (Supp. III 2015) (“the EAA”), which lapsed on August 21, 2001. 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 14, 2019 (84 Fed. Reg. 41881 (Aug. 15, 2019)), continued the Regulations in full force and effect under the International Emergency Economic Powers Act, 50 U.S.C. § 1701, et seq. (2012) (“IEEPA”). On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801-4852 (“ECRA”). While Section 1766 of ECRA repeals the provisions of the EAA (except for three sections which are inapplicable here), Section 1768 of ECRA provides, in pertinent part, that all rules and regulations that were made or issued under the EAA, including as continued in effect pursuant to IEEPA, and were in effect as of ECRA’s date of enactment (August 13, 2018), shall continue in effect according to their terms until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA.

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2019). The charged violations occurred during 2015-2017, and are

Charges 1-12 15 C.F.R. § 764.2(a): Engaging in Prohibited Conduct

On twelve occasions between on or about February 2, 2015, and on or about September 28, 2017, Jaguar Imports engaged in conduct prohibited by the Regulations. Specifically, Jaguar Imports exported from the United States stun guns, handcuffs, police batons, and pepper spray (the “items”) to Colombia, Mexico, and Panama without the required BIS licenses. At all times pertinent to the transactions at issue, the items were subject to the Regulations, classified on the Commerce Control List (the “CCL”) under Export Control Classification Numbers (“ECCNs”) 0A985, 0A982, 0A978, and 1A984, respectively, and controlled for Crime Control reasons. The items were valued in total at approximately \$35,355. Pursuant to Section 742.7 of the Regulations, a BIS license was required to export the items to each of the three destinations at issue.

Jaguar Imports has been exporting such security products to customers in Mexico since at least 2008, and to customers in Colombia and Panama since early 2013. Notwithstanding its experience as an exporter, at the time of the transactions at issue, the company had failed to implement an export compliance program.

By making these twelve exports without the required BIS licenses, Jaguar Imports committed twelve violations of Section 764.2(a) of the Regulations.

WHEREAS, BIS and Jaguar Imports have entered into a Settlement Agreement (the “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 Agreement;

IT IS THEREFORE ORDERED:

FIRST, Jaguar Imports shall be assessed a civil penalty in the amount of \$98,000. Jaguar Imports shall pay \$33,000 to the U.S. Department of Commerce in four installments as follows: \$8,250, not later than December 31, 2019; \$8,250, not later than March 31, 2020; \$8,250, not later than June 30, 2020; and \$8,250, not later than September 30, 2020. Payment of the remaining \$65,000 shall be suspended for a period of five years from the date of this Order, and thereafter shall be waived, provided that

accordingly governed by the 2015-2017 versions of Regulations, 15 C.F.R. Parts 730-774 (2015-2017). The 2019 Regulations set forth the procedures that apply to this matter.

during this five-year payment probationary period, Jaguar Imports has not committed another violation of the Export Control Reform Act of 2018 (“ECRA”),³ the Regulations, or any order, license, or authorization issued under ECRA or the Regulations, and has fully complied with the terms of the Agreement and this Order, including full and timely payment of \$33,000 as set forth above.

SECOND, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (2012)), 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, Jaguar Imports 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, Jaguar Imports’ compliance with the terms of the Agreement and this Order, including full and timely payment of the civil penalty in accordance with the payment schedule 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 Jaguar Imports. Accordingly, if Jaguar Imports fails to comply in full with the terms of the Agreement and this Order, the undersigned may issue an order denying all of Jaguar Imports’ export privileges under ECRA and the Regulations for a period of two years from the date of issuance of any such denial order.

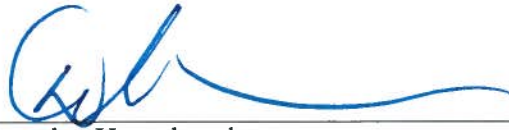
FOURTH, Jaguar Imports shall not take any action or make or permit to be made any public statement, directly or indirectly, denying the allegations in the Proposed Charging Letter or this Order. The foregoing does not affect Jaguar Imports’ testimonial obligations in any proceeding; nor does it affect its right to take legal or factual positions

³ See note 1, *supra*.

in civil litigation or other civil proceedings in which the U.S. Department of Commerce is not a party.

FIFTH, 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.



Douglas Hassebrock
Director, Office of Export Enforcement,
performing the non-exclusive functions and
duties of the Assistant Secretary for Export
Enforcement

Issued this 9th day of October, 2019.

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

In the Matter of:

Jaguar Imports, LLC
7503 Exchange Drive
Orlando, Florida

Respondent

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Jaguar Imports, LLC, of Orlando, Florida (“Jaguar Imports”), 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

WHEREAS, BIS has notified Jaguar Imports of its intentions to initiate an administrative proceeding against Jaguar Imports pursuant to the Regulations;²

¹ The Regulations originally issued under the Export Administration Act of 1979, as amended, 50 U.S.C. §§ 4601-4623 (Supp. III 2015) (“the EAA”), which lapsed on August 21, 2001. 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 14, 2019 (84 Fed. Reg. 41881 (Aug. 15, 2019)), continued the Regulations in full force and effect under the International Emergency Economic Powers Act, 50 U.S.C. § 1701, et seq. (2012) (“IEEPA”). On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801-4852 (“ECRA”). While Section 1766 of ECRA repeals the provisions of the EAA (except for three sections which are inapplicable here), Section 1768 of ECRA provides, in pertinent part, that all rules and regulations that were made or issued under the EAA, including as continued in effect pursuant to IEEPA, and were in effect as of ECRA’s date of enactment (August 13, 2018), shall continue in effect according to their terms until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA.

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2019). The charged violations occurred during the 2015-2017 time period. The Regulations governing the violations at issue are found in the 2015-2017 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774). The 2019 Regulations set forth the procedures that apply to this matter.

WHEREAS, BIS has issued a Proposed Charging Letter to Jaguar Imports that alleges that Jaguar Imports committed twelve violations of the Regulations, specifically:

Charges 1-12 15 C.F.R. § 764.2(a): Engaging in Prohibited Conduct

On twelve occasions between on or about February 2, 2015, and on or about September 28, 2017, Jaguar Imports engaged in conduct prohibited by the Regulations. Specifically, Jaguar Imports exported from the United States stun guns, handcuffs, police batons, and pepper spray (the “items”) to Colombia, Mexico, and Panama without the required BIS licenses. At all times pertinent to the transactions at issue, the items were subject to the Regulations, classified on the Commerce Control List (the “CCL”) under Export Control Classification Numbers (“ECCNs”) 0A985, 0A982, 0A978, and 1A984, respectively, and controlled for Crime Control reasons. The items were valued in total at approximately \$35,355. Pursuant to Section 742.7 of the Regulations, a BIS license was required to export the items to each of the three destinations at issue.

Jaguar Imports has been exporting such security products to customers in Mexico since at least 2008, and to customers in Colombia and Panama since early 2013. Notwithstanding its experience as an exporter, at the time of the transactions at issue, the company had failed to implement an export compliance program.

By making these twelve exports without the required BIS licenses, Jaguar Imports committed twelve violations of Section 764.2(a) of the Regulations.

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

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

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

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

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

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

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

2. The following sanctions shall be imposed against Jaguar Imports:

a. Jaguar Imports shall be assessed a civil penalty in the amount of \$98,000. Jaguar Imports shall pay \$33,000 to the U.S. Department of Commerce in four installments as follows: \$8,250, not later than December 31, 2019; \$8,250, not later than March 31, 2020; \$8,250, not later than June 30, 2020; and \$8,250, not later than September 30, 2020. Payment shall be made in the manner specified in the attached instructions. Payment of the remaining \$65,000 shall be suspended for a period of five years from the date of the Order, and thereafter shall be waived, provided that during this five-year payment probationary period under the Order, Jaguar Imports has not committed another violation of the Export Control Reform Act or 2018 (“ECRA”),³ the Regulations, or any order, license, or authorization issued under ECRA or the Regulations, and has fully complied with the terms of this Agreement and the Order, including full and timely payment of \$33,000 as set forth above.

³ See note 1, *supra*.

b. Compliance with the terms of this Agreement and the Order, including full and timely payment of the civil penalty agreed to in Paragraph 2.a 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 Jaguar Imports. Failure to comply in full with the terms of this Agreement and the Order may result in the denial of all of Jaguar Imports' export privileges under ECRA and the Regulations for a period of two years from the issuance of any such denial order.

3. Subject to the approval of this Agreement pursuant to Paragraph 8 hereof and issuance of the Order, Jaguar Imports hereby waives all rights to further procedural steps in this matter (except the procedural steps set forth in Sections 766.17(c) and 766.18(c) of the Regulations with respect to the possible activation of a suspended sanction due to a violation or violations of this Agreement or the Order), including, without limitation, any right to: (a) receive 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; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order. Jaguar Imports 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 Regulations arising out of the transactions identified in the Proposed Charging Letter, and 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 Jaguar Imports has paid in full the civil penalty as set forth in Paragraph 2.a above.

4. Jaguar Imports 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 Jaguar Imports' 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 Jaguar Imports' full compliance with the terms of this Agreement and the Order, if issued, including 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 Jaguar Imports in connection with any violation of 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.

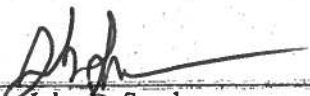
7. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, if issued; nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department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


By: John D. Sonderman
Deputy Director, Office of Export
Enforcement

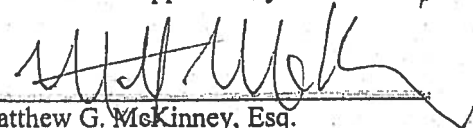
October 9
Date: ~~September~~ _____, 2019

JAGUAR IMPORTS, LLC


Mohammad Sajjad
Co-Owner

Date: September 27, 2019

Reviewed and approved by: *as to form by:*


Matthew G. McKinney, Esq.
Allen, Dyer, Doppelt + Gilchrist, P.A.
Counsel for Jaguar Imports, LLC

October 4
Date: September _____, 2019

PROPOSED CHARGING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Jaguar Imports, LLC
7503 Exchange Drive
Orlando, FL 32809

Attention: Mohammad Sajjad, Co-Owner

Dear Mr. Sajjad:

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that Jaguar Imports, LLC, of Orlando, Florida (“Jaguar Imports”), has violated the Export Administration Regulations (the “EAR” or the “Regulations”).¹ Specifically, BIS alleges that Jaguar Imports violated the Regulations as follows:²

Charges 1-12 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct

As set forth in greater detail in the attached schedule of violations, which is incorporated herein by reference, on twelve occasions between on or about February 2, 2015, and on or about September 28, 2017, Jaguar Imports engaged in conduct prohibited by the

¹ The Regulations originally issued pursuant to the Export Administration Act of 1979 (50 U.S.C. §§ 4601-4623 (Supp. III 2015) (available at <http://uscode.house.gov>)) (“EAA” or “the Act”). 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 14, 2019 (84 Fed. Reg. 41881 (Aug. 15, 2019)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.* (2012)) (“IEEPA”). On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018 (“ECRA”). While Section 1766 of ECRA repeals the provisions of the EAA (except for three sections which are inapplicable here), Section 1768 of ECRA provides, in pertinent part, that all rules and regulations that were made or issued under the EAA, including as continued in effect pursuant to IEEPA, and were in effect as of ECRA’s date of enactment (August 13, 2018), shall continue in effect according to their terms until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA.

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2019). The violations alleged occurred during the 2015-2017 time period. The Regulations governing the violations at issue are found in the 2015-2017 versions of the Code of Federal Regulations, 15 C.F.R. Parts 730-774 (2015-2017). The 2018 Regulations govern the procedural aspects of this case.

Regulations. Specifically, Jaguar Imports exported from the United States stun guns, handcuffs, police batons, and pepper spray (the “items”) to Colombia, Mexico, and Panama without the required BIS licenses. At all times pertinent to the transactions at issue, the items were subject to the Regulations, classified on the Commerce Control List (the “CCL”) under Export Control Classification Numbers (“ECCNs”) 0A985, 0A982, 0A978, and 1A984, respectively, and controlled for Crime Control reasons. The items were valued in total at approximately \$35,355. Pursuant to Section 742.7 of the Regulations, a BIS license was required to export the items to each of the three destinations at issue.

Jaguar Imports has been exporting such security products to customers in Mexico since at least 2008, and to customers in Colombia and Panama since early 2013. Notwithstanding its experience as an exporter, at the time of the transactions at issue, the company had failed to implement an export compliance program.

By making these twelve exports without the required BIS licenses, Jaguar Imports committed twelve violations of Section 764.2(a) of the Regulations.

* * * * *

Accordingly, Jaguar Imports 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,³ including, but not limited to any or all of the following:

- The maximum civil penalty allowed by law of up to the greater of \$302,584 per violation,⁴ or twice the value of the transaction that is the basis of the violation;⁵

³ The alleged violations occurred prior to August 13, 2018, the date of enactment of the ECRA. Consequently, the potential sanctions are provided for in the International Emergency Economic Powers Act. In situations involving alleged violations that occurred on or after August 13, 2018, the potential sanctions are specified in Section 1760(c) of the ECRA.

⁴ See 15 C.F.R. §§ 6.3(b)(4), 6.4. This amount is subject to annual increases pursuant to the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, Sec. 701 of Public Law 114-74, enacted on November 2, 2015.

⁵ See International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

- Denial of export privileges;
- Exclusion from practice before BIS; and/or
- Any other liability, sanction, or penalty available under law.

If Jaguar Imports 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 Jaguar Imports defaults, the Administrative Law Judge may find the charge alleged in this letter is true without a hearing or further notice to it. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty for the charge in this letter.

Jaguar Imports 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. Jaguar Imports 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 Jaguar Imports have a proposal to settle this case, Jaguar Imports should transmit it to the attorney representing BIS named below.

Jaguar Imports is further notified that under the Small Business Regulatory Enforcement Flexibility Act, it 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, Jaguar Imports'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 Jaguar Imports's answer must be served on BIS at the following address:

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

Jaguar Imports, LLC
Proposed Charging Letter
Page 4 of 4

Parvin R. Huda is the attorney representing BIS in this case; any communications that Jaguar Imports 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

JAGUAR IMPORTS, LLC. SCHEDULE OF VIOLATIONS

<u>VIOLATION NO.</u>	<u>EXPORT DATE</u>	<u>ITEM/ECCN</u>	<u>TOTAL VALUE</u>	<u>COUNTRY</u>	<u>VIOLATIONS</u>
1	2/2/2015	Stun Guns / 0A985	\$11,600	Colombia	15 CFR 764.2(a)
		Handcuffs / 0A982			
2	7/4/2015	Handcuffs / 0A982	\$1,376	Colombia	15 CFR 764.2(a)
		Stun Guns / 0A985			
		Police Batons / 0A978			
3	8/14/2015	Police Batons / 0A978	\$3,634	Colombia	15 CFR 764.2(a)
		Stun Guns / 0A985			
		Handcuffs / 0A982			
		4 oz. Pepper Spray / 1A984			
4	9/8/2015	Police Batons / 0A978	\$1,308	Panama	15 CFR 764.2(a)
		Stun Guns / 0A985			
		4 oz. Pepper Spray / 1A984			
5	10/30/2015	Stun Guns / 0A985	\$1,503	Panama	15 CFR 764.2(a)
		4 oz. Pepper Spray / 1A984			
		Police Batons / 0A978			
		Handcuffs / 0A982			
6	1/22/2016	Stun Guns / 0A985	\$2,010	Panama	15 CFR 764.2(a)
		4 oz. Pepper Spray / 1A984			
		Police Batons / 0A978			
7	2/11/2016	Handcuffs / 0A982	\$1,928	Colombia	15 CFR 764.2(a)
		Stun Guns / 0A985			
8	7/15/2016	Police Batons / 0A978	\$1,659	Colombia	15 CFR 764.2(a)

<u>VIOLATION NO.</u>	<u>EXPORT DATE</u>	<u>ITEM/ECCN</u>	<u>TOTAL VALUE</u>	<u>COUNTRY</u>	<u>VIOLATIONS</u>
		Stun Guns / 0A985			
9	11/9/2016	4 oz. Pepper Spray / 1A984	\$3,532	Panama	15 CFR 764.2(a)
		Stun Guns / 0A985			
		Police Batons / 0A978			
		Handcuffs / 0A982			
10	2/23/2017	Stun Guns / 0A985	\$1,992	Colombia	15 CFR 764.2(a)
		Handcuffs / 0A982			
11	6/30/2017	Stun Guns / 0A985	\$1,779	Panama	15 CFR 764.2(a)
		4 oz. Pepper Spray / 1A984			
12	9/28/2017	Police Batons / 0A978	\$3,034	Mexico	15 CFR 764.2(a)