

- 4 2001



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Export Administration
Washington, D.C. 20230
CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Sigma Aldrich Research Biochemicals, Inc.
1 Strathmore Road
Natick, MA 01760

Attn: *Peter A. Gleich*
President

Dear Mr. Gleich:

The Office of Export Enforcement, Bureau of Export Administration, United States Department of Commerce (BXA), hereby charges that, as described in detail below, Sigma Aldrich Research Biochemicals, Inc., directly and as successor of the business of Research Biochemicals Limited Partnership, (Sigma Aldrich RBI), has violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2000)) (the Regulations),¹ issued under the Export Administration Act of 1979, as amended (50 U.S.C.A. app. §§ 2401-2420 (1991 & Supp. 2000) and Pub. L. No. 106-508) (the Act).²

Facts constituting violation:

Charges 1- 704

As described in greater detail in Schedule A, which is enclosed herewith and incorporated herein by reference, BXA alleges that on 704 separate occasions from on or about January 6, 1995 through on or about April 27, 1998, Sigma Aldrich RBI exported from the United States various toxins, including but

¹ The violations at issue occurred from 1995 through 1998. The Regulations governing the violations at issue are found in the 1995 through 1998 versions of the Code of Federal Regulations (15 C.F.R. Parts 768-799 (1995) and 15 C.F.R. Parts 768-799 (1996), as amended (61 *Fed. Reg.* 12714, March 25, 1996)) (hereinafter the "former Regulations"), and 15 C.F.R. Parts 730-774 (1997-1998)). The March 25, 1996 *Federal Register* publication redesignated, but did not republish, the then-existing Regulations as 15 C.F.R. Parts 768A-799A. In addition, the March 25, 1996 *Federal Register* publication restructured and reorganized the Regulations, designating them as an interim rule at 15 C.F.R. Parts 730-774, effective April 24, 1996. The former Regulations define the various violations that BXA alleges occurred from 1995 through December 31, 1996. The Regulations define the various violations that BXA alleges occurred on or after January 1, 1997 and establish the procedures that apply to this matter.

² The Act expired on August 20, 1994. Executive Order 12924 (3 C.F.R., 1994 Comp. 917 (1995)), which has been extended by successive Presidential Notices, the most recent being that of August 3, 2000 (65 *Fed. Reg.* 48347, August 8, 2000), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C.A. §§ 1701-1706 (1991 & Supp. 2000)) until November 13, 2000 when the Act was reauthorized. See Pub. L. No. 106-508.



not limited to omega conotoxin MVIIC, omega conotoxin GVIA TFA salt, tetrodotoxin, tetrodotoxin citrate, and microcystin-Lr, items subject to the former Regulations and Regulations, to various destinations, including but not limited to France, Sweden, Netherlands, Germany, Norway, Austria, Mexico, United Kingdom, Japan and Taiwan, without obtaining Department of Commerce licenses as required by Section 778.8(a) of the former Regulations and Section 742.2 of the Regulations. BXA alleges that by exporting the toxins to any person or to any destination in violation of or contrary to the provisions of the Act or any regulation, order or license issued thereunder, Sigma Aldrich RBI committed 255 violations of Section 787.6 and 187 violations of Section 787A.6 of the former Regulations, and 262 violations of Section 764.2(a) of the Regulations, for a total of 704 violations.

Charges 705- 809

As described in greater detail in Schedule A, which is enclosed herewith and incorporated herein by reference, on 105 separate occasions from or about January 13, 1995 through on or about April 27, 1998, Sigma Aldrich RBI prepared export control documents, as defined in Section 770.2 of the former Regulations and Part 772 of the Regulations, notably Shipper's Export Declarations, on which it represented that the various toxins did not require a validated license from the Department of Commerce for export from the United States to the various destinations, but that they qualified for export to the destinations under general license G-DEST of the former Regulations or NLR of the Regulations. However, these toxins did not qualify for export under the authorities cited by Sigma Aldrich RBI, and required validated licenses from the Department of Commerce for export from the United States to the various destinations. By making false or misleading statements of material fact, directly or indirectly, to a United States agency in connection with the preparation of export control documents to effect exports from the United States, BXA alleges that Sigma Aldrich RBI committed 26 violations of Section 787.5(a)(1) and 27 violations of Section 787A.5(a)(1) of the former Regulations, and 52 violations of Section 764.2(g)(1) of the Regulations, for a total of 105 violations.

Charges 810-1019

As described in greater detail in Schedule A, which is enclosed herewith and incorporated herein by reference, BXA alleges that on 210 separate occasions, Sigma Aldrich RBI failed to maintain records, including copies of Shipper's Export Declarations and air waybills, as required by Section 762.2 of the Regulations. BXA alleges that, by failing to maintain records that were required to be kept under the Regulations, Sigma Aldrich committed 210 violations of Section 764.2(i) of the Regulations.

Accordingly, Sigma Aldrich RBI is hereby notified that an administrative proceeding is instituted against it pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including any or all of the following:

The maximum civil penalty allowed by law is \$10,000 per violation, subject to the inflation adjustment (*see* Section 764.3(a)(1) of the Regulations);³

Denial of export privileges (*see* Section 764.3(a)(2) of the Regulations); and/or

Exclusion from practice before BXA (*see* Section 764.3(a)(3) of the Regulations).

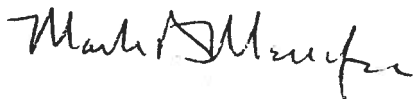
Copies of relevant Parts of the Regulations are enclosed.

If Sigma Aldrich RBI fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter as provided in Section 766.6 of the Regulations, that failure will be treated as a default under Section 766.7 of the Regulations.

Sigma Aldrich RBI is further notified that it is entitled to an agency hearing on the record as provided by Section 13(c) of the Act and Section 766.6 of the Regulations, if a written demand for one is filed with its answer, to be represented by counsel, and to seek a consent settlement.

Pursuant to an Interagency Agreement between BXA and the U.S. Coast Guard, the U.S. Coast Guard is providing administrative law judge services, to the extent that such services are required under the Regulations, in connection with the matters set forth in this letter. Accordingly, Sigma Aldrich RBI's answer should be filed with the U.S. Coast Guard ALJ Docketing Center, 40 S. Gay Street, Baltimore, Maryland 21202-4022, in accordance with the instructions in Section 766.5(a) of the Regulations. In addition, a copy of Sigma Aldrich RBI's answer should be served on BXA at the address set forth in Section 766.5(b), adding "ATTENTION: Melissa B. Mannino, Esq." below the address. Ms. Mannino may be contacted by telephone at (202) 482-5304.

Sincerely,



Mark D. Menefee
Director
Office of Export Enforcement

Enclosure

³ The maximum civil penalty for any violation committed after October 23, 1996 and prior to November 1, 2000 is \$11,000 per violation. *See* 15 C.F.R. § 6.4(a)(3) (2000).

SCHEDULE A
SIGMA ALDRICH RESEARCH BIOCHEMICALS, INC.

EXPORT	EXPORT DATE	COMMODITY	DESTINATION	INVOICE	SED NOTATION	VIOLATIONS
1	01/06/1995	OMEGA CONOTOXIN MVIIC	France	99772	N/A	15 CFR 787.6
2	01/06/1995	TETRODOTOXIN	Sweden	99766	N/A	15 CFR 787.6
3	01/09/1995	TETRODOTOXIN	Netherlands	99829	N/A	15 CFR 787.6
4	01/11/1995	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	100083	N/A	15 CFR 787.6
5	01/11/1995	TETRODOTOXIN	Norway	100077	N/A	15 CFR 787.6
6	01/12/1995	OMEGA CONOTOXIN GVIA TFA SALT	Austria	100188	N/A	15 CFR 787.6
7	01/13/1995	OMEGA-CONOTOXIN MVIIC	United Kingdom	100285	Blank	15 CFR 787.6 15 CFR 787.5(a)(1)
8	01/13/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	100283	N/A	15 CFR 787.6
9	01/16/1995	TETRODOTOXIN CITRATE	Taiwan	100360	N/A	15 CFR 787.6
10	01/16/1995	TETRODOTOXIN	Spain	100361	N/A	15 CFR 787.6
11	01/19/1995	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	100568	Blank	15 CFR 787.6 15 CFR 787.5(a)(1)
12	01/30/1995	TETRODOTOXIN	Italy	101273	Blank	15 CFR 787.6 15 CFR 787.5(a)(1)
13	01/30/1995	OMEGA-CONOTOXIN MVIIC	United Kingdom	101276	N/A	15 CFR 787.6
14	01/31/1995	TETRODOTOXIN	Germany	101383	N/A	15 CFR 787.6
15	02/01/1995	TETRODOTOXIN	Germany	101499	N/A	15 CFR 787.6
16	02/02/1995	TETRODOTOXIN CITRATE	Spain	101574	N/A	15 CFR 787.6
17	02/06/1995	TETRODOTOXIN	Switzerland	101779	N/A	15 CFR 787.6
18	02/06/1995	TETRODOTOXIN	Japan	101771	N/A	15 CFR 787.6
19	02/07/1995	TETRODOTOXIN	Netherlands	101880	N/A	15 CFR 787.6
20	02/08/1995	CONOTOXIN MI	France	101999	N/A	15 CFR 787.6
21	02/08/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	102008	N/A	15 CFR 787.6
22	02/09/1995	TETRODOTOXIN	Taiwan	102123	N/A	15 CFR 787.6
23	02/10/1995	TETRODOTOXIN	Germany	102214	N/A	15 CFR 787.6
24	02/13/1995	TETRODOTOXIN	Netherlands	102307	N/A	15 CFR 787.6
25	02/14/1995	OMEGA-CONOTOXIN MVIIC	Argentina	102387	N/A	15 CFR 787.6
26	02/15/1995	MICROCYSTIN-LR	Hungary	102476	N/A	15 CFR 787.6
27	02/15/1995	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Taiwan	102473	N/A	15 CFR 787.6
28	02/16/1995	OMEGA CONOTOXIN MVIIC MICROCYSTIN LR	Belgium	102552	N/A	15 CFR 787.6
29	02/17/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	102636	N/A	15 CFR 787.6

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30	02/20/1995	TETRODOTOXIN	Israel	102709	N/A	15 CFR 787.6
31	02/21/1995	TETRODOTOXIN CITRATE	Switzerland	102808	N/A	15 CFR 787.6
32	02/22/1995	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	102881	Blank	15 CFR 787.6
33	03/01/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	103331	N/A	15 CFR 787.6
34	03/01/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	103333	N/A	15 CFR 787.6
35	03/02/1995	OMEGA-CONOTOXIN MVIIC	United Kingdom	103428	N/A	15 CFR 787.6
36	03/07/1995	TETRODOTOXIN	Italy	103566	G-DEST	15 CFR 787.6
37	03/10/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	103918	N/A	15 CFR 787.5(a)(1)
38	03/10/1995	TETRODOTOXIN	Spain	103919	N/A	15 CFR 787.6
39	03/13/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Hong Kong	103999	N/A	15 CFR 787.6
40	03/13/1995	TETRODOTOXIN	Switzerland	104004	N/A	15 CFR 787.6
41	03/15/1995	TETRODOTOXIN CITRATE	United Kingdom	104188	N/A	15 CFR 787.6
42	03/16/1995	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	104287	N/A	15 CFR 787.6
43	03/16/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	104281	N/A	15 CFR 787.6
44	03/17/1995	TETRODOTOXIN CITRATE	Germany	104377	N/A	15 CFR 787.6
45	03/20/1995	TETRODOTOXIN CITRATE	France	104454	N/A	15 CFR 787.6
46	03/22/1995	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	United Kingdom	104639	Blank	15 CFR 787.6
47	03/22/1995	TETRODOTOXIN CITRATE	Poland	104634	N/A	15 CFR 787.6
48	03/23/1995	OMEGA-CONOTOXIN GVA TFA SALT	Hong Kong	104726	N/A	15 CFR 787.6
49	03/27/1995	OMEGA CONOTOXIN GVIA TFA SALT	France	104899	N/A	15 CFR 787.6
50	03/28/1995	TETRODOTOXIN	Taiwan	104995	N/A	15 CFR 787.6
51	03/30/1995	TETRODOTOXIN	Italy	105105	G-DEST	15 CFR 787.6
52	03/31/1995	TETRODOTOXIN	Switzerland	105290	N/A	15 CFR 787.5(a)(1)
53	03/31/1995	OMEGA-CONOTOXIN MVIIC	Taiwan	105277	N/A	15 CFR 787.6
54	04/04/1995	OMEGA CONOTOXIN MVIIC	France	105482	N/A	15 CFR 787.6
55	04/04/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Spain	105481	N/A	15 CFR 787.6
56	04/06/1995	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC TETRODOTOXIN	Germany	105657	N/A	15 CFR 787.6
57	04/07/1995	TETRODOTOXIN	Belgium	105755	N/A	15 CFR 787.6
58	04/07/1995	OMEGA-CONOTOXIN MVIIC	Germany	105750	N/A	15 CFR 787.6
59	04/11/1995	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Portugal	105946	N/A	15 CFR 787.6
60	04/18/1995	TETRODOTOXIN CITRATE	Switzerland	106361	N/A	15 CFR 787.6

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61	04/24/1995	OMEGA-CONOTOXIN MVIIC	Italy	106668	N/A	15 CFR 787.6
62	04/25/1995	OMEGA CONOTOXIN GVIA TFA SALT	Italy	106670	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
63	04/25/1995	TETRODOTOXIN CITRATE	Finland	106758	N/A	15 CFR 787.6
64	04/28/1995	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Korea	107035	N/A	15 CFR 787.6
65	04/28/1995	TETRODOTOXIN	Germany	107032	N/A	15 CFR 787.6
66	05/01/1995	TETRODOTOXIN	Taiwan	107106	N/A	15 CFR 787.6
67	05/05/1995	TETRODOTOXIN CITRATE	Greece	107438	N/A	15 CFR 787.6
68	05/12/1995	MICROCYSSTIN-LR TETRODOTOXIN	Switzerland	107878	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
69	05/12/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	107879	N/A	15 CFR 787.6
70	05/12/1995	MU-CONOTOXIN GI1IA	Germany	107884	N/A	15 CFR 787.6
71	05/15/1995	TETRODOTOXIN CITRATE	Taiwan	107972	N/A	15 CFR 787.6
72	05/15/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Portugal	107978	N/A	15 CFR 787.6
73	05/16/1995	TETRODOTOXIN CITRATE	United Kingdom	108101	N/A	15 CFR 787.6
74	05/16/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	108098	N/A	15 CFR 787.6
75	05/19/1995	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	108361	N/A	15 CFR 787.6
76	05/19/1995	TETRODOTOXIN	Switzerland	108364	N/A	15 CFR 787.6
77	05/23/1995	TETRODOTOXIN CITRATE	Germany	108540	N/A	15 CFR 787.6
78	05/25/1995	OMEGA-CONOTOXIN MVIIC	Germany	108731	N/A	15 CFR 787.6
79	05/26/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	108814	N/A	15 CFR 787.6
80	05/31/1995	TETRODOTOXIN CITRATE	Germany	108961	N/A	15 CFR 787.6
81	06/01/1995	OMEGA CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	France	109059	N/A	15 CFR 787.6
82	06/01/1995	TETRODOTOXIN CITRATE	Switzerland	109060	N/A	15 CFR 787.6
83	06/02/1995	OMEGA CONOTOXIN GVIA TFA SALT	Italy	109064	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
84	06/05/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	109253	N/A	15 CFR 787.6
85	06/15/1995	OMEGA-CONOTOXIN MVIIC	United Kingdom	110005	N/A	15 CFR 787.6
86	06/16/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	110069	N/A	15 CFR 787.6
87	06/19/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	110155	N/A	15 CFR 787.6
88	06/20/1995	TETRODOTOXIN CITRATE	Germany	110229	N/A	15 CFR 787.6
89	06/26/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	110568	N/A	15 CFR 787.6
90	06/27/1995	TETRODOTOXIN CITRATE	Mexico	110555	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)

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91	06/28/1995	TETRODOTOXIN CITRATE	Mexico	110646	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
92	07/07/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	111181	N/A	15 CFR 787.6
93	07/07/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	111182	N/A	15 CFR 787.6
94	07/11/1995	MICROCYSSTIN-LR	Hungary	111336	N/A	15 CFR 787.6
95	07/11/1995	OMEGA-CONOTOXIN MVIIC	Germany	111337	N/A	15 CFR 787.6
96	07/12/1995	TETRODOTOXIN CITRATE	Switzerland	111426	N/A	15 CFR 787.6
97	07/13/1995	TETRODOTOXIN CITRATE	Hong Kong	111508	N/A	15 CFR 787.6
98	07/14/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	111572	N/A	15 CFR 787.6
99	07/17/1995	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Germany	111634	N/A	15 CFR 787.6
100	07/19/1995	MICROCYSSTIN-LR	France	111800	N/A	15 CFR 787.6
101	07/20/1995	OMEGA-CONOTOXIN MVIIC TERTODOTOXIN CITRATE	Taiwan	111878	N/A	15 CFR 787.6
102	07/21/1995	TETRODOTOXIN CITRATE	France	111937	N/A	15 CFR 787.6
103	07/24/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Poland	112008	N/A	15 CFR 787.6
104	07/24/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	112010	N/A	15 CFR 787.6
105	07/24/1995	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	112013	N/A	15 CFR 787.6
106	07/24/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	112053	N/A	15 CFR 787.6
107	07/25/1995	TETRODOTOXIN CITRATE	Italy	112097	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
108	07/31/1995	OMEGA CONOTOXIN MVIIC	France	112451	N/A	15 CFR 787.6
109	08/02/1995	OMEGA CONOTOXIN MVIIC	France	112628	N/A	15 CFR 787.6
110	08/03/1995	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Argentina	112708	N/A	15 CFR 787.6
111	08/11/1995	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	113195	N/A	15 CFR 787.6
112	08/14/1995	OMEGA-CONOTOXIN MVIIC	Belgium	113286	N/A	15 CFR 787.6
113	08/16/1995	TETRODOTOXIN CITRATE	Switzerland	113412	N/A	15 CFR 787.6
114	08/17/1995	TETRODOTOXIN CITRATE	Sweden	113492	N/A	15 CFR 787.6
115	08/17/1995	TETRODOTOXIN CITRATE	Sweden	113487	N/A	15 CFR 787.6
116	08/21/1995	MICROCYSSTIN-LR	Japan	113645	N/A	15 CFR 787.6
117	08/24/1995	TETRODOTOXIN CITRATE	Korea	113883	N/A	15 CFR 787.6
118	08/28/1995	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	114044	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
119	09/06/1995	TETRODOTOXIN	Germany	114496	N/A	15 CFR 787.6
120	09/06/1995	TETRODOTOXIN CITRATE	Sweden	114508	N/A	15 CFR 787.6
121	09/07/1995	TETRODOTOXIN	Kuwait	114561	N/A	15 CFR 787.6

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122	09/07/1995	TETRODOTOXIN	Finland	114563	N/A	15 CFR 787.6
123	09/08/1995	TETRODOTOXIN	France	114656	N/A	15 CFR 787.6
124	09/08/1995	TETRODOTOXIN	Japan	114654	N/A	15 CFR 787.6
125	09/13/1995	TETRODOTOXIN CITRATE TETRODOTOXIN	Taiwan	114880 114881 114879	N/A	15 CFR 787.6
126	09/14/1995	OMEGA CONOTOXIN GVIA TFA SALT	France	114955	N/A	15 CFR 787.6
127	09/14/1995	TETRODOTOXIN CITRATE	Sweden	114968	N/A	15 CFR 787.6
128	09/14/1995	TETRODOTOXIN	Hong Kong	114949	N/A	15 CFR 787.6
129	09/15/1995	TETRODOTOXIN	Germany	115038	N/A	15 CFR 787.6
130	09/19/1995	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	115214	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
131	09/19/1995	TETRODOTOXIN CITRATE	France	115213	N/A	15 CFR 787.6
132	09/19/1995	TETRODOTOXIN	Israel	115207	N/A	15 CFR 787.6
133	09/19/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Finland	115215	N/A	15 CFR 787.6
134	09/25/1995	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Korea	115572 115561	N/A	15 CFR 787.6
135	09/27/1995	TETRODOTOXIN	Italy	115738 115739	N/A	15 CFR 787.6
136	09/27/1995	CONOTOXIN MI	United Kingdom	115745	N/A	15 CFR 787.6
137	09/28/1995	TETRODOTOXIN CITRATE	Hong Kong	115819	N/A	15 CFR 787.6
138	09/28/1995	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Hong Kong	115839	N/A	15 CFR 787.6
139	09/28/1995	TETRODOTOXIN CITRATE OMEGA CONOTOXIN GVIA TFA SALT	Italy	115738 115739 115742	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
140	09/29/1995	TETRODOTOXIN	Belgium	115896	N/A	15 CFR 787.6
141	10/03/1995	TETRODOTOXIN CITRATE	Sweden	116082	N/A	15 CFR 787.6
142	10/04/1995	TETRODOTOXIN	Sweden	116130	N/A	15 CFR 787.6
143	10/06/1995	TETRODOTOXIN CITRATE	Australia	116308	N/A	15 CFR 787.6
144	10/06/1995	TETRODOTOXIN CITRATE	United Kingdom	116306	N/A	15 CFR 787.6
145	10/10/1995	OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	116436 116441 116448	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
146	10/11/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	116510	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
147	10/13/1995	TETRODOTOXIN CITRATE	Sweden	116707	N/A	15 CFR 787.6
148	10/16/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Ireland	116787	N/A	15 CFR 787.6
149	10/18/1995	TETRODOTOXIN	Spain	116965	N/A	15 CFR 787.6

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SIGMA ALDRICH RESEARCH BIOCHEMICALS, INC.

150	10/20/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	117187	N/A	15 CFR 787.6
151	10/23/1995	TETRODOTOXIN CITRATE	France	117270	N/A	15 CFR 787.6
152	10/26/1995	TETRODOTOXIN CITRATE	United Kingdom	117506	N/A	15 CFR 787.6
153	10/26/1995	TETRODOTOXIN	Spain	117509	N/A	15 CFR 787.6
154	10/27/1995	TETRODOTOXIN	Germany	117577	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
155	10/27/1995	TETRODOTOXIN	Switzerland	117574	N/A	15 CFR 787.6
156	10/30/1995	TETRODOTOXIN	Italy	117659	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
157	10/30/1995	TETRODOTOXIN CITRATE	Sweden	117692	N/A	15 CFR 787.6
158	10/30/1995	MICROCYSTIN-LR	Denmark	117661	N/A	15 CFR 787.6
159	10/30/1995	TETRODOTOXIN CITRATE	Germany	117667	N/A	15 CFR 787.6
160	10/30/1995	TETRODOTOXIN CITRATE	United Kingdom	117668	N/A	15 CFR 787.6
161	10/31/1995	TETRODOTOXIN	Hong Kong	117747	N/A	15 CFR 787.6
162	11/01/1995	TETRODOTOXIN	Germany	117811	N/A	15 CFR 787.6
163	11/03/1995	TETRODOTOXIN	Denmark	117951	N/A	15 CFR 787.6
164	11/06/1995	TETRODOTOXIN CITRATE	Mexico	118028	N/A	15 CFR 787.6
165	11/06/1995	TETRODOTOXIN	Germany	118035	N/A	15 CFR 787.6
166	11/07/1995	TETRODOTOXIN CITRATE	France	118109	N/A	15 CFR 787.6
167	11/13/1995	TETRODOTOXIN CITRATE	Switzerland	118429	N/A	15 CFR 787.6
168	11/14/1995	TETRODOTOXIN	New Zealand	118486	N/A	15 CFR 787.6
169	11/15/1995	TETRODOTOXIN CITRATE	Germany	118548	N/A	15 CFR 787.6
170	11/17/1995	TETRODOTOXIN CITRATE	France	118716	N/A	15 CFR 787.6
171	11/22/1995	TETRODOTOXIN CITRATE	France	118971	N/A	15 CFR 787.6
172	11/22/1995	TETRODOTOXIN	Belgium	118963	N/A	15 CFR 787.6
173	11/27/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Argentina	119053	N/A	15 CFR 787.6
174	11/27/1995	TETRODOTOXIN	United Kingdom	119052	N/A	15 CFR 787.6
175	11/27/1995	TETRODOTOXIN CITRATE	Poland	119031	N/A	15 CFR 787.6
176	11/29/1995	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Italy	119236	N/A	15 CFR 787.6
177	11/29/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	119242	N/A	15 CFR 787.6
178	11/29/1995	TETRODOTOXIN	Germany	119246	N/A	15 CFR 787.6
179	11/30/1995	MICROCYSTIN-LR	Switzerland	119332	N/A	15 CFR 787.6
180	12/01/1995	TETRODOTOXIN CITRATE	Malaysia	119400	N/A	15 CFR 787.6
181	12/01/1995	CONOTOXIN MI	France	119410	N/A	15 CFR 787.6
182	12/01/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	119407	N/A	15 CFR 787.6
183	12/05/1995	TETRODOTOXIN CITRATE	Poland	119572	N/A	15 CFR 787.6
184	12/06/1995	TETRODOTOXIN	Portugal	119650	N/A	15 CFR 787.6

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185	12/07/1995	TETRODOTOXIN	United Kingdom	119732	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
186	12/11/1995	TETRODOTOXIN CITRATE	France	119903	N/A	15 CFR 787.6
187	12/11/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	119937	N/A	15 CFR 787.6
188	12/12/1995	TETRODOTOXIN	Taiwan	119992	N/A	15 CFR 787.6
189	12/13/1995	TETRODOTOXIN	France	120075	N/A	15 CFR 787.6
190	12/13/1995	TETRODOTOXIN CITRATE	France	120075	N/A	15 CFR 787.6
191	12/13/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	120083	N/A	15 CFR 787.6
192	12/14/1995	TETRODOTOXIN	United Arab Emirates	120176	N/A	15 CFR 787.6
193	12/14/1995	TETRODOTOXIN	United Kingdom	120177	N/A	15 CFR 787.6
194	12/15/1995	TETRODOTOXIN CITRATE	Hong Kong	120273	N/A	15 CFR 787.6
195	12/19/1995	TETRODOTOXIN	Germany	120463	N/A	15 CFR 787.6
196	12/21/1995	CONOTOXIN MI TETRODOTOXIN CITRATE	France	120550	N/A	15 CFR 787.6
197	12/22/1995	OMEGA-CONOTOXIN GVIA TFA SALT	Spain	120614	N/A	15 CFR 787.6
198	12/26/1995	TETRODOTOXIN CITRATE	Brazil	120647	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
199	12/26/1995	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	120661	N/A	15 CFR 787.6
200	12/26/1995	MICROCYSSTIN-LR	Hungary	120652	N/A	15 CFR 787.6
201	12/26/1995	TETRODOTOXIN CITRATE	Belgium	120659	N/A	15 CFR 787.6
202	12/28/1995	TETRODOTOXIN CITRATE	Portugal	120828	N/A	15 CFR 787.6
203	01/11/1996	TETRODOTOXIN	Finland	121247	N/A	15 CFR 787.6
204	01/15/1996	TETRODOTOXIN CITRATE	France	121460	N/A	15 CFR 787.6
205	01/15/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	121398	N/A	15 CFR 787.6
206	01/16/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	121548	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
207	01/17/1996	TETRODOTOXIN CITRATE	Sweden	121633	N/A	15 CFR 787.6
208	01/22/1996	TETRODOTOXIN CITRATE	Sweden	121816	N/A	15 CFR 787.6
209	01/22/1996	TETRODOTOXIN	Germany	121824	N/A	15 CFR 787.6
210	01/22/1996	TETRODOTOXIN	Germany	121896	N/A	15 CFR 787.6
211	01/22/1996	OMEGA-CONOTOXIN MVIIC	United Kingdom	121892 121893	N/A	15 CFR 787.6
212	01/23/1996	OMEGA-CONOTOXIN MVIIC	Brazil	121990	N/A	15 CFR 787.6
213	01/24/1996	OMEGA-CONOTOXIN MVIIC	France	122101	N/A	15 CFR 787.6
214	01/24/1996	OMEGA-CONOTOXIN MVIIC	Korea	122085 122087	N/A	15 CFR 787.6
215	01/24/1996	OMEGA-CONOTOXIN MVIIC	Switzerland	122086	N/A	15 CFR 787.6

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216	01/24/1996	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	122093	N/A	15 CFR 787.6
217	01/24/1996	TETRODOTOXIN CITRATE	Spain	122095	N/A	15 CFR 787.6
218	01/26/1996	TETRODOTOXIN CITRATE	Germany	122345	N/A	15 CFR 787.6
219	01/26/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	France	122346	N/A	15 CFR 787.6
220	01/26/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	122347	N/A	15 CFR 787.6
221	01/26/1996	OMEGA-CONOTOXIN MVIIC	Taiwan	122285	N/A	15 CFR 787.6
222	01/26/1996	MICROCYSTIN-LR	Japan	122344	N/A	15 CFR 787.6
223	01/29/1996	OMEGA CONOTOXIN MVIIC OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Italy	122466	N/A	15 CFR 787.6
224	01/29/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Mexico	122465	N/A	15 CFR 787.6
225	01/30/1996	TETRODOTOXIN	United Kingdom	122571	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
226	01/30/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	122576	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
227	01/30/1996	OMEGA-CONOTOXIN MVIIC	Norway	122630	N/A	15 CFR 787.6
228	01/31/1996	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	122667	N/A	15 CFR 787.6
229	02/05/1996	OMEGA-CONOTOXIN MVIIC	Mexico	122938	N/A	15 CFR 787.6
230	02/09/1996	TETRODOTOXIN	France	123311	N/A	15 CFR 787.6
231	02/12/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Finland	123402	N/A	15 CFR 787.6
232	02/14/1996	TETRODOTOXIN CITRATE	Poland	123621	N/A	15 CFR 787.6
233	02/15/1996	TETRODOTOXIN CITRATE TETRODOTOXIN	Switzerland	123695	N/A	15 CFR 787.6
234	02/16/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	123798	N/A	15 CFR 787.6
235	02/21/1996	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	124070	N/A	15 CFR 787.6
236	02/22/1996	TETRODOTOXIN	Norway	124184	N/A	15 CFR 787.6
237	02/23/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	124219	N/A	15 CFR 787.6
238	02/23/1996	OMEGA-CONOTOXIN MVIIC	United Kingdom	124216	N/A	15 CFR 787.6
239	02/23/1996	TETRODOTOXIN	Netherlands	124215	N/A	15 CFR 787.6
240	02/26/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Japan	124314	N/A	15 CFR 787.6
241	02/28/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Italy	124513	N/A	15 CFR 787.6
242	02/29/1996	TETRODOTOXIN	Korea	124605	N/A	15 CFR 787.6
243	03/04/1996	TETRODOTOXIN	Australia	124769	N/A	15 CFR 787.6

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244	03/04/1996	OMEGA-CONOTOXIN MVIIC	France	124766	N/A	15 CFR 787.6
245	03/05/1996	TETRODOTOXIN	France	124890	N/A	15 CFR 787.6
246	03/06/1996	TETRODOTOXIN	Norway	125039	N/A	15 CFR 787.6
247	03/07/1996	MICROCYSTIN-LR	Japan	125077	N/A	15 CFR 787.6
248	03/11/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Australia	125145	N/A	15 CFR 787.6
249	03/11/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Hungary	125190	N/A	15 CFR 787.6
250	03/14/1996	TETRODOTOXIN	France	125492	N/A	15 CFR 787.6
251	03/19/1996	OMEGA-CONOTOXIN MVIIC	Australia	125773	N/A	15 CFR 787.6
252	03/20/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	125966	N/A	15 CFR 787.6
253	03/22/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	126094	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
254	03/22/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	France	126086	N/A	15 CFR 787.6
255	03/22/1996	TETRODOTOXIN	Denmark	126095	N/A	15 CFR 787.6
256	03/26/1996	TETRODOTOXIN	Netherlands	126281	N/A	15 CFR 787A.6
257	03/27/1996	TETRODOTOXIN	Germany	126347	N/A	15 CFR 787A.6
258	03/29/1996	OMEGA-CONOTOXIN MVIIC	United Kingdom	126553	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
259	04/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	126641	N/A	15 CFR 787A.6
260	04/03/1996	OMEGA-CONOTOXIN MVIIC OMEGA CONOTOXIN GVIA TFA SALT	United Kingdom	126793 126794	N/A	15 CFR 787A.6
261	04/05/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Korea	127059	N/A	15 CFR 787A.6
262	04/05/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	127067	N/A	15 CFR 787A.6
263	04/09/1996	TETRODOTOXIN	Germany	127169	N/A	15 CFR 787A.6
264	04/11/1996	TETRODOTOXIN	Italy	127340	N/A	15 CFR 787A.6
265	04/11/1996	TETRODOTOXIN CITRATE	Sweden	127347	N/A	15 CFR 787A.6
266	04/12/1996	TETRODOTOXIN CITRATE	France	127456	N/A	15 CFR 787A.6
267	04/12/1996	TETRODOTOXIN CITRATE	Taiwan	127449	N/A	15 CFR 787A.6
268	04/12/1996	TETRODOTOXIN CITRATE	Germany	127460	N/A	15 CFR 787A.6
269	04/12/1996	TETRODOTOXIN CITRATE	Japan	127462	N/A	15 CFR 787A.6
270	04/12/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	127463	N/A	15 CFR 787A.6
271	04/15/1996	TETRODOTOXIN CITRATE	Belgium	127500	N/A	15 CFR 787A.6
272	04/15/1996	TETRODOTOXIN CITRATE	Australia	127501	N/A	15 CFR 787A.6

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273	04/15/1996	TETRODOTOXIN	Taiwan	127506	N/A	15 CFR 787A.6
274	04/16/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Australia	127549	N/A	15 CFR 787A.6
275	04/17/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC TETRODOTOXIN	Spain	127696	N/A	15 CFR 787A.6
276	04/18/1996	TETRODOTOXIN CITRATE	France	127812 127814	N/A	15 CFR 787A.6
277	04/19/1996	MICROCYSTIN-LR	Japan	127927	N/A	15 CFR 787A.6
278	04/22/1996	TETRODOTOXIN	Spain	128006	N/A	15 CFR 787A.6
279	04/22/1996	TETRODOTOXIN CITRATE	Spain	128009	N/A	15 CFR 787A.6
280	04/24/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	128216	N/A	15 CFR 787A.6
281	04/25/1996	TETRODOTOXIN	United Kingdom	128317	N/A	15 CFR 787A.6
282	04/26/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	128423	N/A	15 CFR 787A.6
283	04/29/1996	OMEGA CONOTOXIN GVIA TFA SALT MICROCYSTIN-LR	Japan	128453	N/A	15 CFR 787A.6
284	04/29/1996	TETRODOTOXIN CITRATE	Spain	128517	N/A	15 CFR 787A.6
285	04/30/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Australia	128682	N/A	15 CFR 787A.6
286	04/30/1996	TETRODOTOXIN	Netherlands	128695	N/A	15 CFR 787A.6
287	05/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT	New Zealand	128810	N/A	15 CFR 787A.6
288	05/01/1996	TETRODOTOXIN	Taiwan	128721	N/A	15 CFR 787A.6
289	05/03/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	128927	N/A	15 CFR 787A.6
290	05/07/1996	TETRODOTOXIN	Taiwan	129103	N/A	15 CFR 787A.6
291	05/09/1996	OMEGA-CONOTOXIN MVIIC	United Kingdom	129277	N/A	15 CFR 787A.6
292	05/10/1996	TETRODOTOXIN CITRATE	Japan	129428	N/A	15 CFR 787A.6
293	05/10/1996	TETRODOTOXIN	Australia	129435	N/A	15 CFR 787A.6
294	05/14/1996	TETRODOTOXIN CITRATE	Germany	129535	N/A	15 CFR 787A.6
295	05/17/1996	TETRODOTOXIN CITRATE TETRODOTOXIN	Israel	129822	N/A	15 CFR 787A.6
296	05/17/1996	TETRODOTOXIN CITRATE	Switzerland	129826	N/A	15 CFR 787A.6
297	05/20/1996	OMEGA-CONOTOXIN MVIIC	Korea	129900	N/A	15 CFR 787A.6
298	05/21/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	129991	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
299	05/24/1996	TETRODOTOXIN CITRATE	Australia	130324	N/A	15 CFR 787A.6
300	05/24/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	130322	N/A	15 CFR 787A.6

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301	05/29/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Italy	130459	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
302	05/29/1996	TETRODOTOXIN	France	130458	N/A	15 CFR 787A.6
303	05/29/1996	TETRODOTOXIN CITRATE	Germany	130461	N/A	15 CFR 787A.6
304	05/30/1996	OMEGA-CONOTOXIN GVIA TFA SALT	New Zealand	130622	N/A	15 CFR 787A.6
305	05/31/1996	TETRODOTOXIN	Israel	130670	N/A	15 CFR 787A.6
306	05/31/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	130734	N/A	15 CFR 787A.6
307	05/31/1996	TETRODOTOXIN	Sweden	130700	N/A	15 CFR 787A.6
308	06/03/1996	TETRODOTOXIN	Korea	130773	N/A	15 CFR 787A.6
309	06/04/1996	OMEGA-CONOTOXIN MVIIC	Germany	130862	N/A	15 CFR 787A.6
310	06/05/1996	TETRODOTOXIN	Taiwan	130939	N/A	15 CFR 787A.6
311	06/10/1996	SAXITOXIN	United Kingdom	131235	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
312	06/10/1996	OMEGA-CONOTOXIN MVIIC	Mexico	131220	N/A	15 CFR 787A.6
313	06/10/1996	OMEGA-CONOTOXIN MVIIC	Korea	131232	N/A	15 CFR 787A.6
314	06/13/1996	TETRODOTOXIN CITRATE	Belgium	131536	N/A	15 CFR 787A.6
315	06/14/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	131608	N/A	15 CFR 787A.6
316	06/14/1996	TETRODOTOXIN CITRATE	Belgium	131619	N/A	15 CFR 787A.6
317	06/19/1996	OMEGA-CONOTOXIN MVIIC	France	131890	N/A	15 CFR 787A.6
318	06/21/1996	TETRODOTOXIN	United Kingdom	132110	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
319	06/21/1996	TETRODOTOXIN CITRATE	Korea	132113	N/A	15 CFR 787A.6
320	06/22/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Italy	132109	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
321	06/24/1996	TETRODOTOXIN CITRATE	Belgium	132241	N/A	15 CFR 787A.6
322	06/25/1996	TETRODOTOXIN CITRATE	Germany	132277	N/A	15 CFR 787A.6
323	06/26/1996	TETRODOTOXIN	Portugal	132351	N/A	15 CFR 787A.6
324	06/28/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	132517	N/A	15 CFR 787A.6
325	07/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Mexico	132605	N/A	15 CFR 787A.6
326	07/01/1996	TETRODOTOXIN CITRATE	Sweden	132625	N/A	15 CFR 787A.6
327	07/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	132665	N/A	15 CFR 787A.6
328	07/08/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	France	132965	N/A	15 CFR 787A.6

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329	07/08/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC TETRODOTOXIN CITRATE	Netherlands	132968	N/A	15 CFR 787A.6
330	07/09/1996	OMEGA-CONOTOXIN MVIIC	France	133024	N/A	15 CFR 787A.6
331	07/09/1996	TETRODOTOXIN	Netherlands	133025	N/A	15 CFR 787A.6
332	07/11/1996	TETRODOTOXIN	Hong Kong	133236	N/A	15 CFR 787A.6
333	07/12/1996	TETRODOTOXIN	United Kingdom	133324	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
334	07/12/1996	MICROCYSTIN-LR	Denmark	133330	N/A	15 CFR 787A.6
335	07/15/1996	TETRODOTOXIN	Korea	133413	N/A	15 CFR 787A.6
336	07/16/1996	TETRODOTOXIN CITRATE	Italy	133411	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
337	07/18/1996	OMEGA-CONOTOXIN MVIIC	Germany	133712	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
338	07/18/1996	TETRODOTOXIN	Hong Kong	133711	N/A	15 CFR 787A.6
339	07/19/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	133809	N/A	15 CFR 787A.6
340	07/19/1996	TETRODOTOXIN CITRATE	Switzerland	133812	N/A	15 CFR 787A.6
341	07/22/1996	TETRODOTOXIN CITRATE	France	133906	N/A	15 CFR 787A.6
342	07/26/1996	TETRODOTOXIN CITRATE	Japan	134280	N/A	15 CFR 787A.6
343	07/26/1996	OMEGA-CONOTOXIN MVIIC	Korea	134284	N/A	15 CFR 787A.6
344	07/26/1996	TETRODOTOXIN	Spain	134279	N/A	15 CFR 787A.6
345	07/26/1996	TETRODOTOXIN	France	134287	N/A	15 CFR 787A.6
346	07/30/1996	TETRODOTOXIN CITRATE	Sweden	134459	N/A	15 CFR 787A.6
347	08/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT MU CONOTOXIN GIHIA	France	134663	N/A	15 CFR 787A.6
348	08/01/1996	TETRODOTOXIN	Argentina	134667	N/A	15 CFR 787A.6
349	08/02/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	134717	N/A	15 CFR 787A.6
350	08/02/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	134716	N/A	15 CFR 787A.6
351	08/06/1996	TETRODOTOXIN	Germany	134907	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
352	08/08/1996	TETRODOTOXIN CITRATE	France	135073	N/A	15 CFR 787A.6
353	08/09/1996	OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE MICROCYSTIN-LR	Japan	135135	N/A	15 CFR 787A.6

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354	08/09/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	135136	N/A	15 CFR 787A.6
355	08/13/1996	MICROCYSTIN-LR	Hungary	135303	N/A	15 CFR 787A.6
356	08/13/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	135304	N/A	15 CFR 787A.6
357	08/13/1996	TETRODOTOXIN	Hong Kong	135305	N/A	15 CFR 787A.6
358	08/13/1996	TETRODOTOXIN	Switzerland	135312	N/A	15 CFR 787A.6
359	08/16/1996	TETRODOTOXIN	Germany	135552	N/A	15 CFR 787A.6
360	08/19/1996	SAXITOXIN	United Kingdom	135618	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
361	08/23/1996	TETRODOTOXIN CITRATE	Japan	135927	N/A	15 CFR 787A.6
362	08/23/1996	TETRODOTOXIN CITRATE	Sweden	135969	N/A	15 CFR 787A.6
363	09/03/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Australia	136361	N/A	15 CFR 787A.6
364	09/04/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	136455	N/A	15 CFR 787A.6
365	09/05/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Italy	136543	N/A	15 CFR 787A.6
366	09/06/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	136640	N/A	15 CFR 787A.6
367	09/09/1996	TETRODOTOXIN	Mexico	136713	N/A	15 CFR 787A.6
368	09/09/1996	OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Korea	136721	N/A	15 CFR 787A.6
369	09/11/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Australia	136907	N/A	15 CFR 787A.6
370	09/12/1996	TETRODOTOXIN	United Kingdom	136999	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
371	09/12/1996	TETRODOTOXIN CITRATE	Italy	137003	N/A	15 CFR 787A.6
372	09/12/1996	TETRODOTOXIN	Poland	136994	N/A	15 CFR 787A.6
373	09/13/1996	MICROCYSTIN-LR	Japan	137074	N/A	15 CFR 787A.6
374	09/17/1996	TETRODOTOXIN	Netherlands	137302	N/A	15 CFR 787A.6
375	09/17/1996	TETRODOTOXIN TETRODOTOXIN CITRATE	Germany	137257	N/A	15 CFR 787A.6
376	09/20/1996	TETRODOTOXIN	Germany	137546	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
377	09/23/1996	TETRODOTOXIN	Korea	137598	N/A	15 CFR 787A.6
378	09/24/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	137683	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
379	09/24/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	137726	N/A	15 CFR 787A.6

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380	09/27/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	137925	N/A	15 CFR 787A.6
381	09/30/1996	CONOTOXIN MI	France	138021	N/A	15 CFR 787A.6
382	10/03/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	138231	N/A	15 CFR 787A.6
383	10/04/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Israel	138307	N/A	15 CFR 787A.6
384	10/07/1996	TETRODOTOXIN CITRATE	Switzerland	138463	N/A	15 CFR 787A.6
385	10/08/1996	TETRODOTOXIN	Brazil	138466	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
386	10/08/1996	TETRODOTOXIN CITRATE	Germany	138473	N/A	15 CFR 787A.6
387	10/09/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Spain	138566	N/A	15 CFR 787A.6
388	10/14/1996	OMEGA-CONOTOXIN MVIIC	Korea	138875	N/A	15 CFR 787A.6
389	10/15/1996	TETRODOTOXIN	Germany	138901	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
390	10/15/1996	TETRODOTOXIN CITRATE	Italy	138902	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
391	10/17/1996	TETRODOTOXIN	United Kingdom	139062	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
392	10/18/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	139196	N/A	15 CFR 787A.6
393	10/18/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	139197	N/A	15 CFR 787A.6
394	10/21/1996	OMEGA-CONOTOXIN GVIA TFA SALT	France	139254	N/A	15 CFR 787A.6
395	10/22/1996	TETRODOTOXIN	Norway	139345	N/A	15 CFR 787A.6
396	10/24/1996	TETRODOTOXIN	Taiwan	139538	N/A	15 CFR 787A.6
397	10/25/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	139639	N/A	15 CFR 787A.6
398	10/28/1996	TETRODOTOXIN	Belgium	139737	N/A	15 CFR 787A.6
399	10/29/1996	TETRODOTOXIN CITRATE	Switzerland	139828	N/A	15 CFR 787A.6
400	10/30/1996	TETRODOTOXIN CITRATE	Spain	139917	N/A	15 CFR 787A.6
401	10/31/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	140038	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
402	10/31/1996	TETRODOTOXIN CITRATE	United Kingdom	140048	N/A	15 CFR 787A.6
403	11/01/1996	TETRODOTOXIN	Australia	140096	N/A	15 CFR 787A.6
404	11/06/1996	TETRODOTOXIN	Germany	140312	N/A	15 CFR 787A.6

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405	11/08/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIIC TETRODOTOXIN	Germany	140488	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
406	11/08/1996	TETRODOTOXIN CITRATE	Japan	140502	N/A	15 CFR 787A.6
407	11/11/1996	TETRODOTOXIN CITRATE	Poland	140563	N/A	15 CFR 787A.6
408	11/12/1996	TETRODOTOXIN	Germany	140635	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
409	11/12/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Italy	140626	N/A	15 CFR 787A.6
410	11/12/1996	TETRODOTOXIN CITRATE	United Kingdom	140634	N/A	15 CFR 787A.6
411	11/12/1996	TETRODOTOXIN	Hong Kong	140633	N/A	15 CFR 787A.6
412	11/13/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Spain	140730	N/A	15 CFR 787A.6
413	11/15/1996	TETRODOTOXIN CITRATE	Hungary	140901	N/A	15 CFR 787A.6
414	11/15/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Uruguay	140902	N/A	15 CFR 787A.6
415	11/18/1996	TETRODOTOXIN CITRATE	France	140956	N/A	15 CFR 787A.6
416	11/19/1996	TETRODOTOXIN	Spain	141040	N/A	15 CFR 787A.6
417	11/20/1996	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	141128	N/A	15 CFR 787A.6
418	11/22/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	141240	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
419	11/25/1996	SAXITOXIN	Taiwan	141299	N/A	15 CFR 787A.6
420	11/26/1996	TETRODOTOXIN CITRATE	Kuwait	132616	N/A	15 CFR 787A.6 15 CFR 787A.6
421	11/26/1996	TETRODOTOXIN	Germany	141398	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
422	11/26/1996	TETRODOTOXIN	Italy	141399	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
423	11/27/1996	MICROCYSTIN-LR	Japan	141537	N/A	15 CFR 787A.6
424	11/27/1996	TETRODOTOXIN CITRATE	Hungary	141549	N/A	15 CFR 787A.6
425	12/03/1996	TETRODOTOXIN	Spain	141652	N/A	15 CFR 787A.6
426	12/03/1996	TETRODOTOXIN	Portugal	141659	N/A	15 CFR 787A.6
427	12/04/1996	TETRODOTOXIN CITRATE	Mexico	141734	N/A	15 CFR 787A.6
428	12/06/1996	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	141928	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)

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429	12/06/1996	TETRODOTOXIN	United Kingdom	141924	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
430	12/06/1996	TETRODOTOXIN	France	141923	N/A	15 CFR 787A.6
431	12/09/1996	TETRODOTOXIN	Taiwan	142052	N/A	15 CFR 787A.6
432	12/10/1996	TETRODOTOXIN CITRATE	Hungary	142098	N/A	15 CFR 787A.6
433	12/11/1996	MICROCYSTIN-LR TETRODOTOXIN	Germany	142168	N/A	15 CFR 787A.6
434	12/13/1996	MICROCYSTIN-LR	Japan	142334	N/A	15 CFR 787A.6
435	12/13/1996	TETRODOTOXIN CITRATE	Spain	142335	N/A	15 CFR 787A.6
436	12/17/1996	OMEGA-CONOTOXIN MVIIC	Germany	142561	N/A	15 CFR 787A.6
437	12/20/1996	TETRODOTOXIN CITRATE	Japan	142799	N/A	15 CFR 787A.6
438	12/23/1996	TETRODOTOXIN	Germany	142896	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
439	12/23/1996	TETRODOTOXIN	France	142893	N/A	15 CFR 787A.6
440	12/30/1996	TETRODOTOXIN	Korea	143010	N/A	15 CFR 787A.6
441	12/31/1996	MICROCYSTIN-LR	Japan	143074	N/A	15 CFR 787A.6
442	12/31/1996	TETRODOTOXIN	Taiwan	143076	N/A	15 CFR 787A.6
443	01/03/1997	OMEGA-CONOTOXIN MVIIC	Germany	143136	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
444	01/10/1997	TETRODOTOXIN CITRATE	Argentina	143509	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
445	01/10/1997	OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Denmark	143515	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
446	01/14/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	143675	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
447	01/14/1997	TETRODOTOXIN	Taiwan	143750	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
448	01/14/1997	TETRODOTOXIN CITRATE	Netherlands	143680	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
449	01/15/1997	TETRODOTOXIN CITRATE	Switzerland	143757	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
450	01/15/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Hungary	143752	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
451	01/16/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	143832	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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452	01/17/1997	TETRODOTOXIN	Germany	143907	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
453	01/20/1997	TETRODOTOXIN CITRATE	Finland	144029	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
454	01/20/1997	TETRODOTOXIN	Netherlands	144022	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
455	01/21/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	144138	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
456	01/24/1997	OMEGA-CONOTOXIN MVIIC OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Japan	144371	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
457	01/24/1997	TETRODOTOXIN CITRATE	Germany	144376	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
458	01/24/1997	TETRODOTOXIN CITRATE	Belgium	144460	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
459	01/27/1997	TETRODOTOXIN	Italy	144473	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
460	01/27/1997	TETRODOTOXIN	France	144471	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
461	01/28/1997	OMEGA CONOTOXIN MVIIC TETRODOTOXIN	Germany	144570	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
462	01/31/1997	TETRODOTOXIN CITRATE	France	144836	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
463	01/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Australia	144850	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
464	01/31/1997	TETRODOTOXIN CITRATE	Japan	144878	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
465	01/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Germany	144849	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
466	01/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT	New Zealand	144846	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
467	01/31/1997	OMEGA-CONOTOXIN MVIIC	Australia	144851	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
468	02/05/1997	TETRODOTOXIN	France	145110	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
469	02/05/1997	TETRODOTOXIN CITRATE	Belgium	145183	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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470	02/07/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	145275	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
471	02/07/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Israel	145277	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
472	02/10/1997	TETRODOTOXIN	Australia	145404	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
473	02/12/1997	TETRODOTOXIN CITRATE	Italy	145455	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
474	02/12/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	United Kingdom	145538	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
475	02/13/1997	TETRODOTOXIN	France	145612	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
476	02/17/1997	TETRODOTOXIN CITRATE	Spain	145760	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
477	02/17/1997	TETRODOTOXIN	Korea	145761	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
478	02/18/1997	OMEGA-CONOTOXIN MVIIC	France	145836	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
479	02/18/1997	TETRODOTOXIN	Taiwan	145838	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
480	02/18/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	145837	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
481	02/20/1997	TETRODOTOXIN CITRATE	Sweden	146067	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
482	02/20/1997	TETRODOTOXIN CITRATE	United Kingdom	145970	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
483	02/21/1997	TETRODOTOXIN	Germany	146080	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
484	02/21/1997	TETRODOTOXIN CITRATE	Japan	146092	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
485	02/24/1997	TETRODOTOXIN CITRATE	United Kingdom	146189	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
486	02/24/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Taiwan	146185	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
487	02/27/1997	TETRODOTOXIN CITRATE	United Kingdom	146478	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
488	02/28/1997	TETRODOTOXIN CITRATE	Japan	146577	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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489	02/28/1997	TETRODOTOXIN TETRODOTOXIN CITRATE	Germany	146571	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
490	02/28/1997	TETRODOTOXIN	Taiwan	146578	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
491	02/28/1997	TETRODOTOXIN CITRATE	Sweden	146667	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
492	03/03/1997	OMEGA-CONOTOXIN MVIIC	Korea	146675	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
493	03/03/1997	TETRODOTOXIN CITRATE	France	146676	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
494	03/04/1997	TETRODOTOXIN CITRATE	Sweden	146764	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
495	03/05/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	United Kingdom	146857	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
496	03/07/1997	TETRODOTOXIN CITRATE	Germany	147038	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
497	03/14/1997	TETRODOTOXIN CITRATE	Japan	147508	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
498	03/17/1997	TETRODOTOXIN CITRATE	Switzerland	147588	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
499	03/17/1997	OMEGA-CONOTOXIN MVIIC	Germany	147590	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
500	03/17/1997	TETRODOTOXIN	France	147586	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
501	03/18/1997	OMEGA-CONOTOXIN MVIIC	France	147675	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
502	03/20/1997	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	147872	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
503	03/24/1997	TETRODOTOXIN CITRATE	Japan	147942	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
504	03/24/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	148037	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
505	03/25/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	148157	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
506	03/26/1997	TETRODOTOXIN	France	148229	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
507	03/26/1997	TETRODOTOXIN CITRATE	United Kingdom	148230	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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508	03/27/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC TETRODOTOXIN CITRATE	France	148329	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
509	03/28/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	148414	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
510	03/31/1997	TETRODOTOXIN	Norway	148555	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
511	04/02/1997	OMEGA-CONOTOXIN MVIIC TETRODOTOXIN CITRATE	Mexico	148589	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
512	04/02/1997	TETRODOTOXIN CITRATE	Austria	148591	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
513	04/03/1997	OMEGA-CONOTOXIN GVIA TFA SALT	France	148593	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
514	04/04/1997	TETRODOTOXIN CITRATE	Japan	148769	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
515	04/04/1997	TETRODOTOXIN	Germany	148770	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
516	04/04/1997	TETRODOTOXIN CITRATE	Taiwan	148767	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
517	04/10/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONTOXIN MVIIC	Taiwan	149127	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
518	04/11/1997	TETRODOTOXIN	Germany	149231	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
519	04/14/1997	TETRODOTOXIN CITRATE	Japan	149228	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
520	04/14/1997	TETRODOTOXIN CITRATE	Hong Kong	149310	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
521	04/15/1997	TETRODOTOXIN	Germany	149425	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
522	04/21/1997	TETRODOTOXIN CITRATE	New Zealand	149755	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
523	04/22/1997	TETRODOTOXIN CITRATE	Germany	149859	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
524	04/23/1997	TETRODOTOXIN CITRATE	France	149947	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
525	04/24/1997	TETRODOTOXIN	Germany	149680	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)

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526	04/25/1997	OMEGA-CONOTOXIN MVIIC TETRODOTOXIN	Germany	150135	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
527	04/28/1997	TETRODOTOXIN	Taiwan	150201	NLR	15 CFR 764.2(a)
528	04/28/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Korea	150202	N/A	15 CFR 764.2(g)(1) 15 CFR 764.2(a) 15 CFR 764.2(i)
529	04/28/1997	TETRODOTOXIN CITRATE	France	150204	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
530	04/29/1997	TETRODOTOXIN CITRATE	Spain	150313	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
531	04/29/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	150343	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
532	04/29/1997	TETRODOTOXIN	Germany	150316	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
533	05/01/1997	TETRODOTOXIN	France	150499	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
534	05/01/1997	TETRODOTOXIN	Germany	150500	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
535	05/02/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	150586	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
536	05/05/1997	TETRODOTOXIN	Sweden	150727	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
537	05/06/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Spain	150756	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
538	05/08/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	150905	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
539	05/08/1997	TETRODOTOXIN	France	150906	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
540	05/12/1997	TETRODOTOXIN	Italy	142205	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
541	05/13/1997	TETRODOTOXIN CITRATE	Germany	151162	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
542	05/16/1997	OMEGA-CONOTOXIN MVIIC TETRODOTOXIN CITRATE	Germany	151418	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
543	05/19/1997	TETRODOTOXIN CITRATE	Japan	151413	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
544	05/19/1997	TETRODOTOXIN CITRATE	Uruguay	151405	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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545	05/20/1997	TETRODOTOXIN	Taiwan	151589	G-DEST	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
546	05/21/1997	TETRODOTOXIN CITRATE	Hong Kong	151677	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
547	05/22/1997	TETRODOTOXIN	United Kingdom	151772	G-DEST	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
548	05/27/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	151938	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
549	05/28/1997	TETRODOTOXIN CITRATE	France	152065	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
550	05/29/1997	OMEGA-CONOTOXIN MVIIC	Germany	152146	G-DEST	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
551	06/01/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Israel	152257	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
552	06/01/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Spain	152260	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
553	06/01/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Japan	152258	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
554	06/01/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	United Kingdom	152261	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
555	06/02/1997	TETRODOTOXIN CITRATE	Switzerland	152371	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
556	06/03/1997	TETRODOTOXIN	Germany	152458	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
557	06/04/1997	TETRODOTOXIN CITRATE	United Kingdom	152364	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
558	06/05/1997	OMEGA-CONOTOXIN GVIA TFA SALT	France	152662	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
559	06/06/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	152781	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
560	06/06/1997	TETRODOTOXIN CITRATE	Poland	152760	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
561	06/09/1997	MICROCYSTIN-LR	Japan	152754	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
562	06/09/1997	OMEGA-CONOTOXIN GVIA TFA SALT	France	152872	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
563	06/09/1997	MICROCYSTIN-LR	United Kingdom	152878	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)

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564	06/10/1997	TETRODOTOXIN CITRATE	France	152974	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
565	06/10/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	152977	Blank	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
566	06/13/1997	TETRODOTOXIN	Spain	153260	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
567	06/16/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	India	153372	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
568	06/16/1997	SAXITOXIN TETRODOTOXIN	India	153372	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
569	06/17/1997	TETRODOTOXIN	Germany	153364	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
570	06/18/1997	TETRODOTOXIN	Netherlands	153583	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
571	06/19/1997	MICROCYSTIN-LR	Denmark	153647	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
572	06/23/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Netherlands	153830	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
573	06/24/1997	TETRODOTOXIN	Germany	153927	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
574	06/26/1997	MICROCYSTIN-LR	Australia	154118	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
575	06/27/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	154212	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
576	07/03/1997	OMEGA-CONOTOXIN MVIIC SAXITOXIN TETRODOTOXIN	United Kingdom	154550	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
577	07/03/1997	TETRODOTOXIN CITRATE	United Kingdom	154545	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
578	07/07/1997	TETRODOTOXIN CITRATE	France	154599	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
579	07/07/1997	TETRODOTOXIN CITRATE	Germany	154597	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
580	07/07/1997	TETRODOTOXIN CITRATE	Taiwan	154603	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
581	07/08/1997	OMEGA-CONOTOXIN MVIIC	France	154708	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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582	07/08/1997	TETRODOTOXIN CITRATE	United Kingdom	154715	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
583	07/09/1997	TETRODOTOXIN CITRATE	Japan	154702	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
584	07/10/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Denmark	154902	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
585	07/10/1997	TETRODOTOXIN	Turkey	154892	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
586	07/11/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	154989	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
587	07/11/1997	OMEGA-CONOTOXIN MVIIC	Spain	154987	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
588	07/15/1997	OMEGA-CONOTOXIN MVIIC TETRODOTOXIN CITRATE	Germany	155169	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
589	07/22/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	155607	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
590	07/28/1997	TETRODOTOXIN	Australia	155960	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
591	08/06/1997	OMEGA-CONOTOXIN MVIIC MICROCYSTIN-LR	Japan	156320	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
592	08/06/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	France	156584	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
593	08/07/1997	TETRODOTOXIN CITRATE	United Kingdom	156664	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
594	08/08/1997	OMEGA-CONOTOXIN MVIIC	Germany	156733	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
595	08/08/1997	TETRODOTOXIN CITRATE	France	156738	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
596	08/08/1997	TETRODOTOXIN	Taiwan	156732	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
597	08/11/1997	MICROCYSTIN-LR	Denmark	156797	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
598	08/13/1997	TETRODOTOXIN CITRATE MICROCYSTIN-LR	Japan	156892	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
599	08/14/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	United Kingdom	157026	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
600	08/19/1997	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	157280	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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601	08/20/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	157320	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
602	08/21/1997	OMEGA-CONOTOXIN MVIIC	United Kingdom	157404	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
603	08/22/1997	OMEGA-CONOTOXIN MVIIC	Japan	157109	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
604	08/22/1997	TETRODOTOXIN CITRATE	France	157496	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
605	08/22/1997	TETRODOTOXIN CITRATE	Germany	157574	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
606	08/25/1997	MICROCYSSTIN-LR	Denmark	157667	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
607	09/04/1997	TETRODOTOXIN CITRATE	Japan	158038	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
608	09/08/1997	OMEGA-CONOTOXIN MVIIC	Japan	158385	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
609	09/09/1997	TETRODOTOXIN CITRATE TETRODOTOXIN OMEGA CONOTOXIN GVIA TFA SALT MICROCYSSTIN-LR	Germany	158540	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
610	09/12/1997	TETRODOTOXIN	Germany	158846	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
611	09/15/1997	MICROCYSSTIN-LR	Japan	158852	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
612	09/16/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	159023	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
613	09/18/1997	TETRODOTOXIN	Brazil	159189	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
614	09/19/1997	OMEGA-CONOTOXIN MVIIC	Germany	159274	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
615	09/22/1997	SAXITOXIN TETRODOTOXIN	Switzerland	159347	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
616	09/23/1997	TETRODOTOXIN	Hungary	159431	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
617	09/25/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Netherlands	159613	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
618	09/26/1997	TETRODOTOXIN CITRATE	Germany	159701	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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619	09/30/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	159905	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
620	10/01/1997	TETRODOTOXIN	Argentina	160008	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
621	10/03/1997	TETRODOTOXIN CITRATE	Germany	160172	NLR	15 CFR 764.2(a)
622	10/03/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Spain	160173	N/A	15 CFR 764.2(g)(1)
623	10/06/1997	OMEGA-CONOTOXIN MVIIC	Japan	160182	N/A	15 CFR 764.2(a)
624	10/06/1997	OMEGA-CONOTOXIN GVIA TFA SALT MICROCYSTIN-LR	Germany	160253	N/A	15 CFR 764.2(i)
625	10/06/1997	MICROCYSTIN-LR	Denmark	160256	N/A	15 CFR 764.2(a)
626	10/10/1997	TETRODOTOXIN CITRATE	Germany	160577	NLR	15 CFR 764.2(i)
627	10/10/1997	TETRODOTOXIN CITRATE	Taiwan	160571	N/A	15 CFR 764.2(a)
628	10/10/1997	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	160583	N/A	15 CFR 764.2(a)
629	10/13/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Denmark	160645	N/A	15 CFR 764.2(a)
630	10/14/1997	SAXITOXIN	Germany	160728	N/A	15 CFR 764.2(i)
631	10/20/1997	TETRODOTOXIN CITRATE	Switzerland	160996	N/A	15 CFR 764.2(a)
632	10/23/1997	TETRODOTOXIN CITRATE	France	161292	N/A	15 CFR 764.2(i)
633	10/24/1997	OMEGA-CONOTOXIN MVIIC	Spain	161373	N/A	15 CFR 764.2(a)
634	10/24/1997	OMEGA-CONOTOXIN MVIIC MICROCYSTIN-LR	Japan	161392	N/A	15 CFR 764.2(i)
635	10/28/1997	TETRODOTOXIN CITRATE	Germany	161560	N/A	15 CFR 764.2(a)
636	10/28/1997	TETRODOTOXIN CITRATE	Switzerland	161556	N/A	15 CFR 764.2(i)
637	10/29/1997	OMEGA-CONOTOXIN MVIIC MICROCYSTIN-LR	Japan	161392	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)

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638	10/31/1997	TETRODOTOXIN CITRATE	Taiwan	161797	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
639	10/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Spain	161794	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
640	10/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	161806	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
641	10/31/1997	MICROCYSTIN-LR	Japan	161792	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
642	10/31/1997	TETRODOTOXIN	United Kingdom	161803	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
643	11/04/1997	TETRODOTOXIN CITRATE	Germany	161912	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
644	11/05/1997	MICROCYSTIN-LR	Japan	161780	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
645	11/12/1997	OMEGA-CONOTOXIN MVIIC	Japan	162178	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
646	11/14/1997	TETRODOTOXIN CITRATE	France	162590	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
647	11/14/1997	TETRODOTOXIN CITRATE	Japan	162601	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
648	11/14/1997	TETRODOTOXIN CITRATE	United Kingdom	162586	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
649	11/14/1997	OMEGA-CONOTOXIN MVIIC	Taiwan	162588	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
650	11/18/1997	TETRODOTOXIN CITRATE	Germany	162766	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
651	11/20/1997	TETRODOTOXIN CITRATE	France	162942	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
652	11/21/1997	TETRODOTOXIN CITRATE	Germany	163029	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
653	11/25/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	163206	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
654	11/25/1997	OMEGA-CONOTOXIN GVIA TFA SALT	France	163205	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
655	11/26/1997	TETRODOTOXIN CITRATE	Japan	163286	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
656	12/02/1997	TETRODOTOXIN CITRATE	France	163396	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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657	12/03/1997	TETRODOTOXIN	France	163576	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
658	12/04/1997	TETRODOTOXIN	Taiwan	163672	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
659	12/05/1997	TETRODOTOXIN CITRATE	Japan	163764	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
660	12/09/1997	TETRODOTOXIN CITRATE	Germany	163868	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
661	12/11/1997	TETRODOTOXIN	France	164097	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
662	12/12/1997	TETRODOTOXIN CITRATE MICROCYSSTIN-LR	Japan	164189	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
663	12/15/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	France	164263	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
664	12/15/1997	OMEGA-CONOTOXIN GVIA TFA SALT	France	164262	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
665	12/19/1997	TETRODOTOXIN	United Kingdom	164433	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
666	12/20/1997	OMEGA-CONOTOXIN MVIIIC	Germany	164427	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
667	12/22/1997	TETRODOTOXIN	France	164525	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
668	12/23/1997	MICROCYSSTIN-LR	Korea	164704	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
669	12/24/1997	MICROCYSSTIN-LR TETRODOTOXIN	Japan	164521	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
670	01/02/1998	TETRODOTOXIN CITRATE	Spain	164958	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
671	01/05/1998	OMEGA-CONOTOXIN MVIIIC TETRODOTOXIN MICROCYSSTIN-LR	Japan	164914	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
672	01/06/1998	OMEGA-CONOTOXIN GVIA TFA SALT	Singapore	165084	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
673	01/12/1998	TETRODOTOXIN CITRATE	Japan	165320	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
674	01/23/1998	TETRODOTOXIN	India	166100	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)

SCHEDULE A
SIGMA ALDRICH RESEARCH BIOCHEMICALS, INC.

675	01/23/1998	OMEGA-CONOTOXIN GVIA TFA SALT	Israel	166110	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
676	01/27/1998	TETRODOTOXIN CITRATE	Japan	166113	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
677	01/30/1998	TETRODOTOXIN CITRATE	Germany	166551	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
678	02/04/1998	TETRODOTOXIN CITRATE	Japan	166569	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
679	02/04/1998	TETRODOTOXIN CITRATE	Germany	166790	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
680	02/09/1998	OMEGA-CONOTOXIN MVIIC	Japan	166916	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
681	02/17/1998	OMEGA-CONOTOXIN MVIIC	Japan	167375	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
682	02/20/1998	OMEGA-CONOTOXIN MVIIC	Taiwan	167743	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
683	02/24/1998	OMEGA-CONOTOXIN MVIIC	Japan	167744	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
684	02/26/1998	SAXITOXIN	France	168066	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
685	02/27/1998	TETRODOTOXIN CITRATE	France	168133	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
686	02/27/1998	MICROCYSSTIN-LR	Denmark	168149	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
687	03/03/1998	TETRODOTOXIN	Japan	168147	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
688	03/04/1998	TETRODOTOXIN CITRATE	France	168467	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
689	03/06/1998	TETRODOTOXIN CITRATE	Taiwan	168604	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
690	03/10/1998	TETRODOTOXIN CITRATE	Japan	168616	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
691	03/11/1998	OMEGA-CONOTOXIN GVIA TFA SALT	Mexico	168838	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
692	03/13/1998	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	United Kingdom	168991	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
693	03/17/1998	TETRODOTOXIN CITRATE	Sweden	169179	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

SCHEDULE A
 SIGMA ALDRICH RESEARCH BIOCHEMICALS, INC.

694	03/20/1998	TETRODOTOXIN CITRATE	France	169432	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
695	03/20/1998	MICROCYSTIN-LR	United Kingdom	169440	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
696	03/23/1998	OMEGA-CONOTOXIN MVIIC	Korea	169540	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
697	03/25/1998	SAXITOXIN	France	169700	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
698	03/27/1998	TETRODOTOXIN	United Kingdom	169891	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
699	03/31/1998	OMEGA-CONOTOXIN GVIA TFA SALT	Australia	170117	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
700	04/06/1998	MICROCYSTIN-LR	Japan	170369	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
701	04/06/1998	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	170465	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
702	04/17/1998	OMEGA-CONOTOXIN MVIIC	Japan	171122	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
703	04/27/1998	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MI	Japan	171491	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
704	04/27/1998	MICROCYSTIN-LR	Germany	171543	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

MAR 21 2001



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Export Administration
Washington, D.C. 20230

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Sigma-Aldrich Business Holdings, Inc.
Corporation Trust Center
1209 Orange Street
Wilmington, Delaware 19801

Serve: *The Corporation Trust Company*

Dear Sirs and Madames:

The Office of Export Enforcement, Bureau of Export Administration, United States Department of Commerce (BXA), hereby charges that, as described in detail below, Sigma-Aldrich Business Holdings, Inc., as successor of the business of Research Biochemicals Limited Partnership, (SABH) has violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2000)) (the Regulations),¹ issued under the Export Administration Act of 1979, as amended (50 U.S.C.A. app. §§ 2401-2420 (1991 & Supp. 2000) and Pub. L. No. 106-508) (the Act).²

Facts constituting violation:

Charges 1- 264

As described in greater detail in Schedule A, which is enclosed herewith and incorporated herein by reference, BXA alleges that on 264 separate occasions from on or about March 22, 1996 through on or about April 4, 1997, SABH exported from the United States various toxins, including but not limited to omega conotoxin MVIIC, omega conotoxin GVIA TFA salt, tetrodotoxin, tetrodotoxin citrate, and microcystin-lr, items subject to the former Regulations and Regulations, to various destinations, including but not limited to

¹ The violations at issue occurred in 1996 and 1997. The Regulations governing the violations at issue are found in the 1996 through 1997 versions of the Code of Federal Regulations (15 C.F.R. Parts 768-799 (1996), as amended (61 *Fed. Reg.* 12714, March 25, 1996)) (hereinafter the "former Regulations"), and 15 C.F.R. Parts 730-774 (1997)). The March 25, 1996 *Federal Register* publication redesignated, but did not republish, the then-existing Regulations as 15 C.F.R. Parts 768A-799A. In addition, the March 25, 1996 *Federal Register* publication restructured and reorganized the Regulations, designating them as an interim rule at 15 C.F.R. Parts 730-774, effective April 24, 1996. The former Regulations define the various violations that BXA alleges occurred during 1996. The Regulations define the various violations that BXA alleges occurred during 1997 and establish the procedures that apply to this matter.

² The Act expired on August 20, 1994. Executive Order 12924 (3 C.F.R., 1994 Comp. 917 (1995)), which had been extended by successive Presidential Notices, the most recent being that of August 3, 2000 (65 *Fed. Reg.* 48347, August 8, 2000), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C.A. §§ 1701-1706 (1991 & Supp. 2000)) until November 2000 when the Act was reauthorized. See Pub. L. No. 106-508.



France, Sweden, Netherlands, Germany, Norway, Austria, Mexico, United Kingdom, Japan and Taiwan, without obtaining Department of Commerce licenses as required by Section 778.8(a) of the former Regulations and Section 742.2 of the Regulations. BXA alleges that by exporting the toxins to any person or to any destination in violation of or contrary to the provisions of the Act or any regulation, order or license issued thereunder, SABH committed 3 violations of Section 787.6 and 187 violations of Section 787A.6 of the former Regulations, and 74 violations of Section 764.2(a) of the Regulations, for a total of 264 violations.

Charges 265 - 303

As described in greater detail in Schedule A, which is enclosed herewith and incorporated herein by reference, on 39 separate occasions from or about March 22, 1996 through on or about April 4, 1997, SABH prepared export control documents, as defined in Section 770.2 of the former Regulations and Part 772 of the Regulations, notably Shipper's Export Declarations, on which it represented that the various toxins did not require a validated license from the Department of Commerce for export from the United States to the various destinations, but that they qualified for export to the destinations under general license G-DEST of the former Regulations or NLR of the Regulations. However, these toxins did not qualify for export under the authorities cited by SABH, and required validated licenses from the Department of Commerce for export from the United States to the various destinations. By making false or misleading statements of material fact, directly or indirectly, to a United States agency in connection with the preparation of export control documents to effect exports from the United States, BXA alleges that SABH committed 1 violation of Section 787.5(a)(1) and 27 violations of Section 787A.5(a)(1) of the former Regulations, and 11 violations of Section 764.2(g)(1) of the Regulations, for a total of 39 violations.

Charges 304-366

As described in greater detail in Schedule A, which is enclosed herewith and incorporated herein by reference, BXA alleges that on 63 separate occasions, SABH failed to maintain records, including copies of Shipper's Export Declarations and air waybills, as required by Section 762.2 of the Regulations. BXA alleges that, by failing to maintain records that were required to be kept under the Regulations, SABH committed 63 violations of Section 764.2(i) of the Regulations.

Accordingly, SABH is hereby notified that an administrative proceeding is instituted against it pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including any or all of the following:

The maximum civil penalty allowed by law is \$10,000 per violation, subject to the inflation adjustment (*see* Section 764.3(a)(1) of the Regulations);³

³ The maximum civil penalty for any violation committed after October 23, 1996 and prior to November 1, 2000 is \$11,000 per violation. *See* 15 C.F.R. § 6.4(a)(3) (2000).

Sigma-Aldrich Business Holdings, Inc.
Charging Letter
Page 3

Denial of export privileges (*see* Section 764.3(a)(2) of the Regulations); and/or

Exclusion from practice before BXA (*see* Section 764.3(a)(3) of the Regulations).

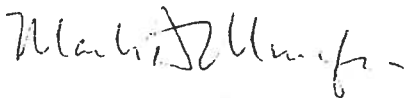
Copies of relevant Parts of the Regulations are enclosed.

If SABH fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter as provided in Section 766.6 of the Regulations, that failure will be treated as a default under Section 766.7 of the Regulations.

SABH is further notified that it is entitled to an agency hearing on the record as provided by Section 13(c) of the Act and Section 766.6 of the Regulations, if a written demand for one is filed with its answer, to be represented by counsel, and to seek a consent settlement.

Pursuant to an Interagency Agreement between BXA and the U.S. Coast Guard, the U.S. Coast Guard is providing administrative law judge services, to the extent that such services are required under the Regulations, in connection with the matters set forth in this letter. Accordingly, SABH's answer should be filed with the U.S. Coast Guard ALJ Docketing Center, 40 S. Gay Street, Baltimore, Maryland 21202-4022, in accordance with the instructions in Section 766.5(a) of the Regulations. In addition, a copy of SABH's answer should be served on BXA at the address set forth in Section 766.5(b), adding "ATTENTION: Melissa B. Mannino, Esq." below the address. Ms. Mannino may be contacted by telephone at (202) 482-5304.

Sincerely,



Mark D. Menefee
Director
Office of Export Enforcement

Enclosure

SIGMA-ALDRICH
BUSINESS HOLDINGS, INC.
SCHEDULE A

EXPORT	EXPORT DATE	COMMODITY	DESTINATION	INVOICE	SED NOTATION	VIOLATIONS
1	03/22/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	126094	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
2	03/22/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	France	126086	N/A	15 CFR 787.6
3	03/22/1996	TETRODOTOXIN	Denmark	126095	N/A	15 CFR 787.6
4	03/26/1996	TETRODOTOXIN	Netherlands	126281	N/A	15 CFR 787A.6
5	03/27/1996	TETRODOTOXIN	Germany	126347	N/A	15 CFR 787A.6
6	03/29/1996	OMEGA-CONOTOXIN MVIIC	United Kingdom	126553	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
7	04/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	126641	N/A	15 CFR 787A.6
8	04/03/1996	OMEGA-CONOTOXIN MVIIC OMEGA CONOTOXIN GVIA TFA SALT	United Kingdom	126793 126794	N/A	15 CFR 787A.6
9	04/05/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Korea	127059	N/A	15 CFR 787A.6
10	04/05/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	127067	N/A	15 CFR 787A.6
11	04/09/1996	TETRODOTOXIN	Germany	127169	N/A	15 CFR 787A.6
12	04/11/1996	TETRODOTOXIN	Italy	127340	N/A	15 CFR 787A.6
13	04/11/1996	TETRODOTOXIN CITRATE	Sweden	127347	N/A	15 CFR 787A.6
14	04/12/1996	TETRODOTOXIN CITRATE	France	127456	N/A	15 CFR 787A.6
15	04/12/1996	TETRODOTOXIN CITRATE	Taiwan	127449	N/A	15 CFR 787A.6
16	04/12/1996	TETRODOTOXIN CITRATE	Germany	127460	N/A	15 CFR 787A.6
17	04/12/1996	TETRODOTOXIN CITRATE	Japan	127462	N/A	15 CFR 787A.6
18	04/12/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	127463	N/A	15 CFR 787A.6
19	04/15/1996	TETRODOTOXIN CITRATE	Belgium	127500	N/A	15 CFR 787A.6
20	04/15/1996	TETRODOTOXIN CITRATE	Australia	127501	N/A	15 CFR 787A.6
21	04/15/1996	TETRODOTOXIN	Taiwan	127506	N/A	15 CFR 787A.6
22	04/16/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Australia	127549	N/A	15 CFR 787A.6
23	04/17/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC TETRODOTOXIN	Spain	127696	N/A	15 CFR 787A.6
24	04/18/1996	TETRODOTOXIN CITRATE	France	127812 127814	N/A	15 CFR 787A.6
25	04/19/1996	MICROCYSTIN-LR	Japan	127927	N/A	15 CFR 787A.6

**SIGMA-ALDRICH
BUSINESS HOLDINGS, INC.
SCHEDULE A**

26	04/22/1996	TETRODOTOXIN	Spain	128006	N/A	15 CFR 787A.6
27	04/22/1996	TETRODOTOXIN CITRATE	Spain	128009	N/A	15 CFR 787A.6
28	04/24/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	128216	N/A	15 CFR 787A.6
29	04/25/1996	TETRODOTOXIN	United Kingdom	128317	N/A	15 CFR 787A.6
30	04/26/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	128423	N/A	15 CFR 787A.6
31	04/29/1996	OMEGA CONOTOXIN GVIA TFA SALT MICROCYSSTIN-LR	Japan	128453	N/A	15 CFR 787A.6
32	04/29/1996	TETRODOTOXIN CITRATE	Spain	128517	N/A	15 CFR 787A.6
33	04/30/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Australia	128682	N/A	15 CFR 787A.6
34	04/30/1996	TETRODOTOXIN	Netherlands	128695	N/A	15 CFR 787A.6
35	05/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT	New Zealand	128810	N/A	15 CFR 787A.6
36	05/01/1996	TETRODOTOXIN	Taiwan	128721	N/A	15 CFR 787A.6
37	05/03/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	128927	N/A	15 CFR 787A.6
38	05/07/1996	TETRODOTOXIN	Taiwan	129103	N/A	15 CFR 787A.6
39	05/09/1996	OMEGA-CONOTOXIN MVIIC	United Kingdom	129277	N/A	15 CFR 787A.6
40	05/10/1996	TETRODOTOXIN CITRATE	Japan	129428	N/A	15 CFR 787A.6
41	05/10/1996	TETRODOTOXIN	Australia	129435	N/A	15 CFR 787A.6
42	05/14/1996	TETRODOTOXIN CITRATE	Germany	129535	N/A	15 CFR 787A.6
43	05/17/1996	TETRODOTOXIN CITRATE TETRODOTOXIN	Israel	129822	N/A	15 CFR 787A.6
44	05/17/1996	TETRODOTOXIN CITRATE	Switzerland	129826	N/A	15 CFR 787A.6
45	05/20/1996	OMEGA-CONOTOXIN MVIIC	Korea	129900	N/A	15 CFR 787A.6
46	05/21/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	129991	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
47	05/24/1996	TETRODOTOXIN CITRATE	Australia	130324	N/A	15 CFR 787A.6
48	05/24/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	130322	N/A	15 CFR 787A.6
49	05/29/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Italy	130459	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
50	05/29/1996	TETRODOTOXIN	France	130458	N/A	15 CFR 787A.6
51	05/29/1996	TETRODOTOXIN CITRATE	Germany	130461	N/A	15 CFR 787A.6
52	05/30/1996	OMEGA-CONOTOXIN GVIA TFA SALT	New Zealand	130622	N/A	15 CFR 787A.6
53	05/31/1996	TETRODOTOXIN	Israel	130670	N/A	15 CFR 787A.6
54	05/31/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	130734	N/A	15 CFR 787A.6
55	05/31/1996	TETRODOTOXIN	Sweden	130700	N/A	15 CFR 787A.6

SIGMA-ALDRICH
BUSINESS HOLDINGS, INC.
SCHEDULE A

56	06/03/1996	TETRODOTOXIN	Korea	130773	N/A	15 CFR 787A.6
57	06/04/1996	OMEGA-CONOTOXIN MVIIC	Germany	130862	N/A	15 CFR 787A.6
58	06/05/1996	TETRODOTOXIN	Taiwan	130939	N/A	15 CFR 787A.6
59	06/10/1996	SAXITOXIN	United Kingdom	131235	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
60	06/10/1996	OMEGA-CONOTOXIN MVIIC	Mexico	131220	N/A	15 CFR 787A.6
61	06/10/1996	OMEGA-CONOTOXIN MVIIC	Korea	131232	N/A	15 CFR 787A.6
62	06/13/1996	TETRODOTOXIN CITRATE	Belgium	131536	N/A	15 CFR 787A.6
63	06/14/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	131608	N/A	15 CFR 787A.6
64	06/14/1996	TETRODOTOXIN CITRATE	Belgium	131619	N/A	15 CFR 787A.6
65	06/19/1996	OMEGA-CONOTOXIN MVIIC	France	131890	N/A	15 CFR 787A.6
66	06/21/1996	TETRODOTOXIN	United Kingdom	132110	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
67	06/21/1996	TETRODOTOXIN CITRATE	Korea	132113	N/A	15 CFR 787A.6
68	06/22/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Italy	132109	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
69	06/24/1996	TETRODOTOXIN CITRATE	Belgium	132241	N/A	15 CFR 787A.6
70	06/25/1996	TETRODOTOXIN CITRATE	Germany	132277	N/A	15 CFR 787A.6
71	06/26/1996	TETRODOTOXIN	Portugal	132351	N/A	15 CFR 787A.6
72	06/28/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	132517	N/A	15 CFR 787A.6
73	07/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Mexico	132605	N/A	15 CFR 787A.6
74	07/01/1996	TETRODOTOXIN CITRATE	Sweden	132625	N/A	15 CFR 787A.6
75	07/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	132665	N/A	15 CFR 787A.6
76	07/08/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	France	132965	N/A	15 CFR 787A.6
77	07/08/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC TETRODOTOXIN CITRATE	Netherlands	132968	N/A	15 CFR 787A.6
78	07/09/1996	OMEGA-CONOTOXIN MVIIC	France	133024	N/A	15 CFR 787A.6
79	07/09/1996	TETRODOTOXIN	Netherlands	133025	N/A	15 CFR 787A.6
80	07/11/1996	TETRODOTOXIN	Hong Kong	133236	N/A	15 CFR 787A.6
81	07/12/1996	TETRODOTOXIN	United Kingdom	133324	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
82	07/12/1996	MICROCYSTIN-LR	Denmark	133330	N/A	15 CFR 787A.6

**SIGMA-ALDRICH
BUSINESS HOLDINGS, INC.
SCHEDULE A**

83	07/15/1996	TETRODOTOXIN	Korea	133413	N/A	15 CFR 787A.6
84	07/16/1996	TETRODOTOXIN CITRATE	Italy	133411	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
85	07/18/1996	OMEGA-CONOTOXIN MVIIC	Germany	133712	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
86	07/18/1996	TETRODOTOXIN	Hong Kong	133711	N/A	15 CFR 787A.6
87	07/19/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	133809	N/A	15 CFR 787A.6
88	07/19/1996	TETRODOTOXIN CITRATE	Switzerland	133812	N/A	15 CFR 787A.6
89	07/22/1996	TETRODOTOXIN CITRATE	France	133906	N/A	15 CFR 787A.6
90	07/26/1996	TETRODOTOXIN CITRATE	Japan	134280	N/A	15 CFR 787A.6
91	07/26/1996	OMEGA-CONOTOXIN MVIIC	Korea	134284	N/A	15 CFR 787A.6
92	07/26/1996	TETRODOTOXIN	Spain	134279	N/A	15 CFR 787A.6
93	07/26/1996	TETRODOTOXIN	France	134287	N/A	15 CFR 787A.6
94	07/30/1996	TETRODOTOXIN CITRATE	Sweden	134459	N/A	15 CFR 787A.6
95	08/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT MU CONOTOXIN GIIIA	France	134663	N/A	15 CFR 787A.6
96	08/01/1996	TETRODOTOXIN	Argentina	134667	N/A	15 CFR 787A.6
97	08/02/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	134717	N/A	15 CFR 787A.6
98	08/02/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	134716	N/A	15 CFR 787A.6
99	08/06/1996	TETRODOTOXIN	Germany	134907	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
100	08/08/1996	TETRODOTOXIN CITRATE	France	135073	N/A	15 CFR 787A.6
101	08/09/1996	OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE MICROCYSITIN-LR	Japan	135135	N/A	15 CFR 787A.6
102	08/09/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	135136	N/A	15 CFR 787A.6
103	08/13/1996	MICROCYSITIN-LR	Hungary	135303	N/A	15 CFR 787A.6
104	08/13/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	135304	N/A	15 CFR 787A.6
105	08/13/1996	TETRODOTOXIN	Hong Kong	135305	N/A	15 CFR 787A.6
106	08/13/1996	TETRODOTOXIN	Switzerland	135312	N/A	15 CFR 787A.6
107	08/16/1996	TETRODOTOXIN	Germany	135552	N/A	15 CFR 787A.6
108	08/19/1996	SAXITOXIN	United Kingdom	135618	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
109	08/23/1996	TETRODOTOXIN CITRATE	Japan	135927	N/A	15 CFR 787A.6

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110	08/23/1996	TETRODOTOXIN CITRATE	Sweden	135969	N/A	15 CFR 787A.6
111	09/03/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Australia	136361	N/A	15 CFR 787A.6
112	09/04/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	136455	N/A	15 CFR 787A.6
113	09/05/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Italy	136543	N/A	15 CFR 787A.6
114	09/06/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	136640	N/A	15 CFR 787A.6
115	09/09/1996	TETRODOTOXIN	Mexico	136713	N/A	15 CFR 787A.6
116	09/09/1996	OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Korea	136721	N/A	15 CFR 787A.6
117	09/11/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Australia	136907	N/A	15 CFR 787A.6
118	09/12/1996	TETRODOTOXIN	United Kingdom	136999	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
119	09/12/1996	TETRODOTOXIN CITRATE	Italy	137003	N/A	15 CFR 787A.6
120	09/12/1996	TETRODOTOXIN	Poland	136994	N/A	15 CFR 787A.6
121	09/13/1996	MICROCYSTIN-LR	Japan	137074	N/A	15 CFR 787A.6
122	09/17/1996	TETRODOTOXIN	Netherlands	137302	N/A	15 CFR 787A.6
123	09/17/1996	TETRODOTOXIN TETRODOTOXIN CITRATE	Germany	137257	N/A	15 CFR 787A.6
124	09/20/1996	TETRODOTOXIN	Germany	137546	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
125	09/23/1996	TETRODOTOXIN	Korea	137598	N/A	15 CFR 787A.6
126	09/24/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	137683	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
127	09/24/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	137726	N/A	15 CFR 787A.6
128	09/27/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	137925	N/A	15 CFR 787A.6
129	09/30/1996	CONOTOXIN MI	France	138021	N/A	15 CFR 787A.6
130	10/03/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	138231	N/A	15 CFR 787A.6
131	10/04/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Israel	138307	N/A	15 CFR 787A.6
132	10/07/1996	TETRODOTOXIN CITRATE	Switzerland	138463	N/A	15 CFR 787A.6
133	10/08/1996	TETRODOTOXIN	Brazil	138466	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
134	10/08/1996	TETRODOTOXIN CITRATE	Germany	138473	N/A	15 CFR 787A.6

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135	10/09/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Spain	138566	N/A	15 CFR 787A.6
136	10/14/1996	OMEGA-CONOTOXIN MVIIC	Korea	138875	N/A	15 CFR 787A.6
137	10/15/1996	TETRODOTOXIN	Germany	138901	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
138	10/15/1996	TETRODOTOXIN CITRATE	Italy	138902	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
139	10/17/1996	TETRODOTOXIN	United Kingdom	139062	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
140	10/18/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	139196	N/A	15 CFR 787A.6
141	10/18/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	139197	N/A	15 CFR 787A.6
142	10/21/1996	OMEGA-CONOTOXIN GVIA TFA SALT	France	139254	N/A	15 CFR 787A.6
143	10/22/1996	TETRODOTOXIN	Norway	139345	N/A	15 CFR 787A.6
144	10/24/1996	TETRODOTOXIN	Taiwan	139538	N/A	15 CFR 787A.6
145	10/25/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	139639	N/A	15 CFR 787A.6
146	10/28/1996	TETRODOTOXIN	Belgium	139737	N/A	15 CFR 787A.6
147	10/29/1996	TETRODOTOXIN CITRATE	Switzerland	139828	N/A	15 CFR 787A.6
148	10/30/1996	TETRODOTOXIN CITRATE	Spain	139917	N/A	15 CFR 787A.6
149	10/31/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	140038	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
150	10/31/1996	TETRODOTOXIN CITRATE	United Kingdom	140048	N/A	15 CFR 787A.6
151	11/01/1996	TETRODOTOXIN	Australia	140096	N/A	15 CFR 787A.6
152	11/06/1996	TETRODOTOXIN	Germany	140312	N/A	15 CFR 787A.6
153	11/08/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC TETRODOTOXIN	Germany	140488	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
154	11/08/1996	TETRODOTOXIN CITRATE	Japan	140502	N/A	15 CFR 787A.6
155	11/11/1996	TETRODOTOXIN CITRATE	Poland	140563	N/A	15 CFR 787A.6
156	11/12/1996	TETRODOTOXIN	Germany	140635	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
157	11/12/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Italy	140626	N/A	15 CFR 787A.6
158	11/12/1996	TETRODOTOXIN CITRATE	United Kingdom	140634	N/A	15 CFR 787A.6

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159	11/12/1996	TETRODOTOXIN	Hong Kong	140633	N/A	15 CFR 787A.6
160	11/13/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Spain	140730	N/A	15 CFR 787A.6
161	11/15/1996	TETRODOTOXIN CITRATE	Hungary	140901	N/A	15 CFR 787A.6
162	11/15/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Uruguay	140902	N/A	15 CFR 787A.6
163	11/18/1996	TETRODOTOXIN CITRATE	France	140956	N/A	15 CFR 787A.6
164	11/19/1996	TETRODOTOXIN	Spain	141040	N/A	15 CFR 787A.6
165	11/20/1996	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	141128	N/A	15 CFR 787A.6
166	11/22/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Germany	141240	G-DEST	15 CFR 787A.5(a)(1)
167	11/25/1996	SAXITOXIN	Taiwan	141299	N/A	15 CFR 787A.6
168	11/26/1996	TETRODOTOXIN CITRATE	Kuwait	132616	N/A	15 CFR 787A.6 15 CFR 787A.6
169	11/26/1996	TETRODOTOXIN	Germany	141398	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
170	11/26/1996	TETRODOTOXIN	Italy	141399	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
171	11/27/1996	MICROCYSTIN-LR	Japan	141537	N/A	15 CFR 787A.6
172	11/27/1996	TETRODOTOXIN CITRATE	Hungary	141549	N/A	15 CFR 787A.6
173	12/03/1996	TETRODOTOXIN	Spain	141652	N/A	15 CFR 787A.6
174	12/03/1996	TETRODOTOXIN	Portugal	141659	N/A	15 CFR 787A.6
175	12/04/1996	TETRODOTOXIN CITRATE	Mexico	141734	N/A	15 CFR 787A.6
176	12/06/1996	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	141928	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
177	12/06/1996	TETRODOTOXIN	United Kingdom	141924	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
178	12/06/1996	TETRODOTOXIN	France	141923	N/A	15 CFR 787A.6
179	12/09/1996	TETRODOTOXIN	Taiwan	142052	N/A	15 CFR 787A.6
180	12/10/1996	TETRODOTOXIN CITRATE	Hungary	142098	N/A	15 CFR 787A.6
181	12/11/1996	MICROCYSTIN-LR TETRODOTOXIN	Germany	142168	N/A	15 CFR 787A.6
182	12/13/1996	MICROCYSTIN-LR	Japan	142334	N/A	15 CFR 787A.6
183	12/13/1996	TETRODOTOXIN CITRATE	Spain	142335	N/A	15 CFR 787A.6

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184	12/17/1996	OMEGA-CONOTOXIN MVIIC	Germany	142561	N/A	15 CFR 787A.6
185	12/20/1996	TETRODOTOXIN CITRATE	Japan	142799	N/A	15 CFR 787A.6
186	12/23/1996	TETRODOTOXIN	Germany	142896	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
187	12/23/1996	TETRODOTOXIN	France	142893	N/A	15 CFR 787A.6
188	12/30/1996	TETRODOTOXIN	Korea	143010	N/A	15 CFR 787A.6
189	12/31/1996	MICROCYSTIN-LR	Japan	143074	N/A	15 CFR 787A.6
190	12/31/1996	TETRODOTOXIN	Taiwan	143076	N/A	15 CFR 787A.6
191	01/03/1997	OMEGA-CONOTOXIN MVIIC	Germany	143136	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
192	01/10/1997	TETRODOTOXIN CITRATE	Argentina	143509	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
193	01/10/1997	OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Denmark	143515	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
194	01/14/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	143675	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
195	01/14/1997	TETRODOTOXIN	Taiwan	143750	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
196	01/14/1997	TETRODOTOXIN CITRATE	Netherlands	143680	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
197	01/15/1997	TETRODOTOXIN CITRATE	Switzerland	143757	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
198	01/15/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Hungary	143752	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
199	01/16/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	143832	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
200	01/17/1997	TETRODOTOXIN	Germany	143907	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
201	01/20/1997	TETRODOTOXIN CITRATE	Finland	144029	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
202	01/20/1997	TETRODOTOXIN	Netherlands	144022	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
203	01/21/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	144138	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
204	01/24/1997	OMEGA-CONOTOXIN MVIIC OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Japan	144371	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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205	01/24/1997	TETRODOTOXIN CITRATE	Germany	144376	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
206	01/24/1997	TETRODOTOXIN CITRATE	Belgium	144460	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
207	01/27/1997	TETRODOTOXIN	Italy	144473	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
208	01/27/1997	TETRODOTOXIN	France	144471	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
209	01/28/1997	OMEGA CONOTOXIN MVIIC TETRODOTOXIN	Germany	144570	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
210	01/31/1997	TETRODOTOXIN CITRATE	France	144836	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
211	01/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Australia	144850	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
212	01/31/1997	TETRODOTOXIN CITRATE	Japan	144878	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
213	01/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Germany	144849	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
214	01/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT	New Zealand	144846	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
215	01/31/1997	OMEGA-CONOTOXIN MVIIC	Australia	144851	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
216	02/05/1997	TETRODOTOXIN	France	145110	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
217	02/05/1997	TETRODOTOXIN CITRATE	Belgium	145183	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
218	02/07/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	145275	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
219	02/07/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Israel	145277	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
220	02/10/1997	TETRODOTOXIN	Australia	145404	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
221	02/12/1997	TETRODOTOXIN CITRATE	Italy	145455	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
222	02/12/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	United Kingdom	145538	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
223	02/13/1997	TETRODOTOXIN	France	145612	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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224	02/17/1997	TETRODOTOXIN CITRATE	Spain	145760	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
225	02/17/1997	TETRODOTOXIN	Korea	145761	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
226	02/18/1997	OMEGA-CONOTOXIN MVIIC	France	145836	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
227	02/18/1997	TETRODOTOXIN	Taiwan	145838	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
228	02/18/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	145837	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
229	02/20/1997	TETRODOTOXIN CITRATE	Sweden	146067	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
230	02/20/1997	TETRODOTOXIN CITRATE	United Kingdom	145970	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
231	02/21/1997	TETRODOTOXIN	Germany	146080	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
232	02/21/1997	TETRODOTOXIN CITRATE	Japan	146092	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
233	02/24/1997	TETRODOTOXIN CITRATE	United Kingdom	146189	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
234	02/24/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Taiwan	146185	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
235	02/27/1997	TETRODOTOXIN CITRATE	United Kingdom	146478	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
236	02/28/1997	TETRODOTOXIN CITRATE	Japan	146577	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
237	02/28/1997	TETRODOTOXIN TETRODOTOXIN CITRATE	Germany	146571	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
238	02/28/1997	TETRODOTOXIN	Taiwan	146578	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
239	02/28/1997	TETRODOTOXIN CITRATE	Sweden	146667	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
240	03/03/1997	OMEGA-CONOTOXIN MVIIC	Korea	146675	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
241	03/03/1997	TETRODOTOXIN CITRATE	France	146676	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
242	03/04/1997	TETRODOTOXIN CITRATE	Sweden	146764	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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243	03/05/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	United Kingdom	146857	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
244	03/07/1997	TETRODOTOXIN CITRATE	Germany	147038	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
245	03/14/1997	TETRODOTOXIN CITRATE	Japan	147508	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
246	03/17/1997	TETRODOTOXIN CITRATE	Switzerland	147588	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
247	03/17/1997	OMEGA-CONOTOXIN MVIIC	Germany	147590	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
248	03/17/1997	TETRODOTOXIN	France	147586	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
249	03/18/1997	OMEGA-CONOTOXIN MVIIC	France	147675	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
250	03/20/1997	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	147872	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
251	03/24/1997	TETRODOTOXIN CITRATE	Japan	147942	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
252	03/24/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	148037	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
253	03/25/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	148157	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
254	03/26/1997	TETRODOTOXIN	France	148229	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
255	03/26/1997	TETRODOTOXIN CITRATE	United Kingdom	148230	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
256	03/27/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC TETRODOTOXIN CITRATE	France	148329	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
257	03/28/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	148414	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
258	03/31/1997	TETRODOTOXIN	Norway	148555	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
259	04/02/1997	OMEGA-CONOTOXIN MVIIC TETRODOTOXIN CITRATE	Mexico	148589	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
260	04/02/1997	TETRODOTOXIN CITRATE	Austria	148591	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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261	04/03/1997	OMEGA-CONOTOXIN GVIA TFA SALT	France	148593	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
262	04/04/1997	TETRODOTOXIN CITRATE	Japan	148769	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
263	04/04/1997	TETRODOTOXIN	Germany	148770	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
264	04/04/1997	TETRODOTOXIN CITRATE	Taiwan	148767	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)

MAR 21 2001



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Export Administration
Washington, D.C. 20230

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Sigma-Aldrich Corporation
3050 Spruce Street
St. Louis, MO 63103

Attn: *David R. Harvey*
President and Chief Executive Officer

Dear Mr. Harvey:

The Office of Export Enforcement, Bureau of Export Administration, United States Department of Commerce (BXA), hereby charges that, as described in detail below, Sigma-Aldrich Corporation, as successor of the business of Research Biochemicals Limited Partnership, (Sigma- Aldrich) has violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2000)) (the Regulations),¹ issued under the Export Administration Act of 1979, as amended (50 U.S.C.A. app. §§ 2401-2420 (1991 & Supp. 2000) and Pub. L. No. 106-508) (the Act).²

Facts constituting violation:

Charges 1- 264

As described in greater detail in Schedule A, which is enclosed herewith and incorporated herein by reference, BXA alleges that on 264 separate occasions from on or about March 22, 1996 through on or about April 4, 1997, Sigma-Aldrich exported from the United States various toxins, including but

¹ The violations at issue occurred in 1996 and 1997. The Regulations governing the violations at issue are found in the 1996 through 1997 versions of the Code of Federal Regulations (15 C.F.R. Parts 768-799 (1996), as amended (61 *Fed. Reg.* 12714, March 25, 1996)) (hereinafter the former Regulations), and 15 C.F.R. Parts 730-774 (1997)). The March 25, 1996 *Federal Register* publication redesignated, but did not republish, the then-existing Regulations as 15 C.F.R. Parts 768A-799A. In addition, the March 25, 1996 *Federal Register* publication restructured and reorganized the Regulations, designating them as an interim rule at 15 C.F.R. Parts 730-774, effective April 24, 1996. The former Regulations define the various violations that BXA alleges occurred during 1996. The Regulations define the various violations that BXA alleges occurred during 1997 and establish the procedures that apply to this matter.

² The Act expired on August 20, 1994. Executive Order 12924 (3 C.F.R., 1994 Comp. 917 (1995)), which had been extended by successive Presidential Notices, the most recent being that of August 3, 2000 (65 *Fed. Reg.* 48347, August 8, 2000), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C.A. §§ 1701-1706 (1991 & Supp. 2000)) until November 13, 2000 when the Act was reauthorized. See Pub. L. No. 106-508.



not limited to omega conotoxin MVIIC, omega conotoxin GVIA TFA salt, tetrodotoxin, tetrodotoxin citrate, and microcystin-lr, items subject to the former Regulations and Regulations, to various destinations, including but not limited to France, Sweden, Netherlands, Germany, Norway, Austria, Mexico, United Kingdom, Japan and Taiwan, without obtaining Department of Commerce licenses as required by Section 778.8(a) of the former Regulations and Section 742.2 of the Regulations. BXA alleges that by exporting the toxins to any person or to any destination in violation of or contrary to the provisions of the Act or any regulation, order or license issued thereunder, Sigma-Aldrich committed 8 violations of Section 787.6 and 187 violations of Section 787A.6 of the former Regulations, and 74 violations of Section 764.2(a) of the Regulations, for a total of 264 violations.

Charges 265-303

As described in greater detail in Schedule A, which is enclosed herewith and incorporated herein by reference, on 39 separate occasions from or about March 22, 1996 through on or about April 4, 1997, Sigma-Aldrich prepared export control documents, as defined in Section 770.2 of the former Regulations and Part 772 of the Regulations, notably Shipper's Export Declarations, on which it represented that the various toxins did not require a validated license from the Department of Commerce for export from the United States to the various destinations, but that they qualified for export to the destinations under general license G-DEST of the former Regulations or NLR of the Regulations. However, these toxins did not qualify for export under the authorities cited by Sigma-Aldrich, and required validated licenses from the Department of Commerce for export from the United States to the various destinations. By making false or misleading statements of material fact, directly or indirectly, to a United States agency in connection with the preparation of export control documents to effect exports from the United States, BXA alleges that Sigma-Aldrich committed 1 violation of Section 787.5(a)(1) and 27 violations of Section 787A.5(a)(1) of the former Regulations, and 11 violations of Section 764.2(g)(1) of the Regulations, for a total of 39 violations.

Charges 304-366

As described in greater detail in Schedule A, which is enclosed herewith and incorporated herein by reference, BXA alleges that on 63 separate occasions, Sigma-Aldrich failed to maintain records, including copies of Shipper's Export Declarations and air waybills, as required by Section 762.2 of the Regulations. BXA alleges that, by failing to maintain records that were required to be kept under the Regulations, Sigma-Aldrich committed 63 violations of Section 764.2(i) of the Regulations.

Accordingly, Sigma-Aldrich is hereby notified that an administrative proceeding is instituted against it pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including any or all of the following:

The maximum civil penalty allowed by law is \$10,000 per violation, subject to the inflation adjustment (*see* Section 764.3(a)(1) of the Regulations);³

Denial of export privileges (*see* Section 764.3(a)(2) of the Regulations); and/or

Exclusion from practice before BXA (*see* Section 764.3(a)(3) of the Regulations).

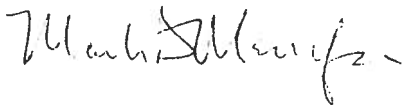
Copies of relevant Parts of the Regulations are enclosed.

If Sigma-Aldrich fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter as provided in Section 766.6 of the Regulations, that failure will be treated as a default under Section 766.7 of the Regulations.

Sigma-Aldrich is further notified that it is entitled to an agency hearing on the record as provided by Section 13(c) of the Act and Section 766.6 of the Regulations, if a written demand for one is filed with its answer, to be represented by counsel, and to seek a consent settlement.

Pursuant to an Interagency Agreement between BXA and the U.S. Coast Guard, the U.S. Coast Guard is providing administrative law judge services, to the extent that such services are required under the Regulations, in connection with the matters set forth in this letter. Accordingly, Sigma-Aldrich's answer should be filed with the U.S. Coast Guard ALJ Docketing Center, 40 S. Gay Street, Baltimore, Maryland 21202-4022, in accordance with the instructions in Section 766.5(a) of the Regulations. In addition, a copy of Sigma-Aldrich's answer should be served on BXA at the address set forth in Section 766.5(b), adding "ATTENTION: Melissa B. Mannino, Esq." below the address. Ms. Mannino may be contacted by telephone at (202) 482-5304.

Sincerely,



Mark D. Menefee
Director
Office of Export Enforcement

Enclosure

³ The maximum civil penalty for any violation committed after October 23, 1996 and prior to November 1, 2000 is \$11,000 per violation. *See* 15 C.F.R. § 6.4(a)(3) (2000).

SIGMA-ALDRICH
CORPORATION
SCHEDULE A

EXPORT	EXPORT DATE	COMMODITY	DESTINATION	INVOICE	SED NOTATION	VIOLATIONS
1	03/22/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	126094	G-DEST	15 CFR 787.6 15 CFR 787.5(a)(1)
2	03/22/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	France	126086	N/A	15 CFR 787.6
3	03/22/1996	TETRODOTOXIN	Denmark	126095	N/A	15 CFR 787.6
4	03/26/1996	TETRODOTOXIN	Netherlands	126281	N/A	15 CFR 787A.6
5	03/27/1996	TETRODOTOXIN	Germany	126347	N/A	15 CFR 787A.6
6	03/29/1996	OMEGA-CONOTOXIN MVIIC	United Kingdom	126553	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
7	04/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	126641	N/A	15 CFR 787A.6
8	04/03/1996	OMEGA-CONOTOXIN MVIIC OMEGA CONOTOXIN GVIA TFA SALT	United Kingdom	126793 126794	N/A	15 CFR 787A.6
9	04/05/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Korea	127059	N/A	15 CFR 787A.6
10	04/05/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	127067	N/A	15 CFR 787A.6
11	04/09/1996	TETRODOTOXIN	Germany	127169	N/A	15 CFR 787A.6
12	04/11/1996	TETRODOTOXIN	Italy	127340	N/A	15 CFR 787A.6
13	04/11/1996	TETRODOTOXIN CITRATE	Sweden	127347	N/A	15 CFR 787A.6
14	04/12/1996	TETRODOTOXIN CITRATE	France	127456	N/A	15 CFR 787A.6
15	04/12/1996	TETRODOTOXIN CITRATE	Taiwan	127449	N/A	15 CFR 787A.6
16	04/12/1996	TETRODOTOXIN CITRATE	Germany	127460	N/A	15 CFR 787A.6
17	04/12/1996	TETRODOTOXIN CITRATE	Japan	127462	N/A	15 CFR 787A.6
18	04/12/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	127463	N/A	15 CFR 787A.6
19	04/15/1996	TETRODOTOXIN CITRATE	Belgium	127500	N/A	15 CFR 787A.6
20	04/15/1996	TETRODOTOXIN CITRATE	Australia	127501	N/A	15 CFR 787A.6
21	04/15/1996	TETRODOTOXIN	Taiwan	127506	N/A	15 CFR 787A.6
22	04/16/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Australia	127549	N/A	15 CFR 787A.6
23	04/17/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC TETRODOTOXIN	Spain	127696	N/A	15 CFR 787A.6
24	04/18/1996	TETRODOTOXIN CITRATE	France	127812 127814	N/A	15 CFR 787A.6
25	04/19/1996	MICROCYSSTIN-LR	Japan	127927	N/A	15 CFR 787A.6

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26	04/22/1996	TETRODOTOXIN	Spain	128006	N/A	15 CFR 787A.6
27	04/22/1996	TETRODOTOXIN CITRATE	Spain	128009	N/A	15 CFR 787A.6
28	04/24/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	128216	N/A	15 CFR 787A.6
29	04/25/1996	TETRODOTOXIN	United Kingdom	128317	N/A	15 CFR 787A.6
30	04/26/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	128423	N/A	15 CFR 787A.6
31	04/29/1996	OMEGA CONOTOXIN GVIA TFA SALT MICROCYSSTIN-LR	Japan	128453	N/A	15 CFR 787A.6
32	04/29/1996	TETRODOTOXIN CITRATE	Spain	128517	N/A	15 CFR 787A.6
33	04/30/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Australia	128682	N/A	15 CFR 787A.6
34	04/30/1996	TETRODOTOXIN	Netherlands	128695	N/A	15 CFR 787A.6
35	05/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT	New Zealand	128810	N/A	15 CFR 787A.6
36	05/01/1996	TETRODOTOXIN	Taiwan	128721	N/A	15 CFR 787A.6
37	05/03/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	128927	N/A	15 CFR 787A.6
38	05/07/1996	TETRODOTOXIN	Taiwan	129103	N/A	15 CFR 787A.6
39	05/09/1996	OMEGA-CONOTOXIN MVIIC	United Kingdom	129277	N/A	15 CFR 787A.6
40	05/10/1996	TETRODOTOXIN CITRATE	Japan	129428	N/A	15 CFR 787A.6
41	05/10/1996	TETRODOTOXIN	Australia	129435	N/A	15 CFR 787A.6
42	05/14/1996	TETRODOTOXIN CITRATE	Germany	129535	N/A	15 CFR 787A.6
43	05/17/1996	TETRODOTOXIN CITRATE TETRODOTOXIN	Israel	129822	N/A	15 CFR 787A.6
44	05/17/1996	TETRODOTOXIN CITRATE	Switzerland	129826	N/A	15 CFR 787A.6
45	05/20/1996	OMEGA-CONOTOXIN MVIIC	Korea	129900	N/A	15 CFR 787A.6
46	05/21/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	129991	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
47	05/24/1996	TETRODOTOXIN CITRATE	Australia	130324	N/A	15 CFR 787A.6
48	05/24/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	130322	N/A	15 CFR 787A.6
49	05/29/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Italy	130459	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
50	05/29/1996	TETRODOTOXIN	France	130458	N/A	15 CFR 787A.6
51	05/29/1996	TETRODOTOXIN CITRATE	Germany	130461	N/A	15 CFR 787A.6
52	05/30/1996	OMEGA-CONOTOXIN GVIA TFA SALT	New Zealand	130622	N/A	15 CFR 787A.6
53	05/31/1996	TETRODOTOXIN	Israel	130670	N/A	15 CFR 787A.6
54	05/31/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	130734	N/A	15 CFR 787A.6
55	05/31/1996	TETRODOTOXIN	Sweden	130700	N/A	15 CFR 787A.6

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56	06/03/1996	TETRODOTOXIN	Korea	130773	N/A	15 CFR 787A.6
57	06/04/1996	OMEGA-CONOTOXIN MVIIC	Germany	130862	N/A	15 CFR 787A.6
58	06/05/1996	TETRODOTOXIN	Taiwan	130939	N/A	15 CFR 787A.6
59	06/10/1996	SAXITOXIN	United Kingdom	131235	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
60	06/10/1996	OMEGA-CONOTOXIN MVIIC	Mexico	131220	N/A	15 CFR 787A.6
61	06/10/1996	OMEGA-CONOTOXIN MVIIC	Korea	131232	N/A	15 CFR 787A.6
62	06/13/1996	TETRODOTOXIN CITRATE	Belgium	131536	N/A	15 CFR 787A.6
63	06/14/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	131608	N/A	15 CFR 787A.6
64	06/14/1996	TETRODOTOXIN CITRATE	Belgium	131619	N/A	15 CFR 787A.6
65	06/19/1996	OMEGA-CONOTOXIN MVIIC	France	131890	N/A	15 CFR 787A.6
66	06/21/1996	TETRODOTOXIN	United Kingdom	132110	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
67	06/21/1996	TETRODOTOXIN CITRATE	Korea	132113	N/A	15 CFR 787A.6
68	06/22/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Italy	132109	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
69	06/24/1996	TETRODOTOXIN CITRATE	Belgium	132241	N/A	15 CFR 787A.6
70	06/25/1996	TETRODOTOXIN CITRATE	Germany	132277	N/A	15 CFR 787A.6
71	06/26/1996	TETRODOTOXIN	Portugal	132351	N/A	15 CFR 787A.6
72	06/28/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	132517	N/A	15 CFR 787A.6
73	07/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Mexico	132605	N/A	15 CFR 787A.6
74	07/01/1996	TETRODOTOXIN CITRATE	Sweden	132625	N/A	15 CFR 787A.6
75	07/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	132665	N/A	15 CFR 787A.6
76	07/08/1996	OMEGA-CONOTOXIN MVIIC	France	132965	N/A	15 CFR 787A.6
77	07/08/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC TETRODOTOXIN CITRATE	Netherlands	132968	N/A	15 CFR 787A.6
78	07/09/1996	OMEGA-CONOTOXIN MVIIC	France	133024	N/A	15 CFR 787A.6
79	07/09/1996	TETRODOTOXIN	Netherlands	133025	N/A	15 CFR 787A.6
80	07/11/1996	TETRODOTOXIN	Hong Kong	133236	N/A	15 CFR 787A.6
81	07/12/1996	TETRODOTOXIN	United Kingdom	133324	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
82	07/12/1996	MICROCYSTIN-LR	Denmark	133330	N/A	15 CFR 787A.6

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83	07/15/1996	TETRODOTOXIN	Korea	133413	N/A	15 CFR 787A.6
84	07/16/1996	TETRODOTOXIN CITRATE	Italy	133411	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
85	07/18/1996	OMEGA-CONOTOXIN MVIIC	Germany	133712	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
86	07/18/1996	TETRODOTOXIN	Hong Kong	133711	N/A	15 CFR 787A.6
87	07/19/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	133809	N/A	15 CFR 787A.6
88	07/19/1996	TETRODOTOXIN CITRATE	Switzerland	133812	N/A	15 CFR 787A.6
89	07/22/1996	TETRODOTOXIN CITRATE	France	133906	N/A	15 CFR 787A.6
90	07/26/1996	TETRODOTOXIN CITRATE	Japan	134280	N/A	15 CFR 787A.6
91	07/26/1996	OMEGA-CONOTOXIN MVIIC	Korea	134284	N/A	15 CFR 787A.6
92	07/26/1996	TETRODOTOXIN	Spain	134279	N/A	15 CFR 787A.6
93	07/26/1996	TETRODOTOXIN	France	134287	N/A	15 CFR 787A.6
94	07/30/1996	TETRODOTOXIN CITRATE	Sweden	134459	N/A	15 CFR 787A.6
95	08/01/1996	OMEGA-CONOTOXIN GVIA TFA SALT MU CONOTOXIN GIHIA	France	134663	N/A	15 CFR 787A.6
96	08/01/1996	TETRODOTOXIN	Argentina	134667	N/A	15 CFR 787A.6
97	08/02/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	134717	N/A	15 CFR 787A.6
98	08/02/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	134716	N/A	15 CFR 787A.6
99	08/06/1996	TETRODOTOXIN	Germany	134907	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
100	08/08/1996	TETRODOTOXIN CITRATE	France	135073	N/A	15 CFR 787A.6
101	08/09/1996	OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE MICROCYSTIN-LR	Japan	135135	N/A	15 CFR 787A.6
102	08/09/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	135136	N/A	15 CFR 787A.6
103	08/13/1996	MICROCYSTIN-LR	Hungary	135303	N/A	15 CFR 787A.6
104	08/13/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	135304	N/A	15 CFR 787A.6
105	08/13/1996	TETRODOTOXIN	Hong Kong	135305	N/A	15 CFR 787A.6
106	08/13/1996	TETRODOTOXIN	Switzerland	135312	N/A	15 CFR 787A.6
107	08/16/1996	TETRODOTOXIN	Germany	135552	N/A	15 CFR 787A.6
108	08/19/1996	SAXITOXIN	United Kingdom	135618	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
109	08/23/1996	TETRODOTOXIN CITRATE	Japan	135927	N/A	15 CFR 787A.6

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110	08/23/1996	TETRODOTOXIN CITRATE	Sweden	135969	N/A	15 CFR 787A.6
111	09/03/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Australia	136361	N/A	15 CFR 787A.6
112	09/04/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	136455	N/A	15 CFR 787A.6
113	09/05/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Italy	136543	N/A	15 CFR 787A.6
114	09/06/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	136640	N/A	15 CFR 787A.6
115	09/09/1996	TETRODOTOXIN	Mexico	136713	N/A	15 CFR 787A.6
116	09/09/1996	OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Korea	136721	N/A	15 CFR 787A.6
117	09/11/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Australia	136907	N/A	15 CFR 787A.6
118	09/12/1996	TETRODOTOXIN	United Kingdom	136999	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
119	09/12/1996	TETRODOTOXIN CITRATE	Italy	137003	N/A	15 CFR 787A.6
120	09/12/1996	TETRODOTOXIN	Poland	136994	N/A	15 CFR 787A.6
121	09/13/1996	MICROCYSITIN-LR	Japan	137074	N/A	15 CFR 787A.6
122	09/17/1996	TETRODOTOXIN	Netherlands	137302	N/A	15 CFR 787A.6
123	09/17/1996	TETRODOTOXIN TETRODOTOXIN CITRATE	Germany	137257	N/A	15 CFR 787A.6
124	09/20/1996	TETRODOTOXIN	Germany	137546	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
125	09/23/1996	TETRODOTOXIN	Korea	137598	N/A	15 CFR 787A.6
126	09/24/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	137683	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
127	09/24/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	137726	N/A	15 CFR 787A.6
128	09/27/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Germany	137925	N/A	15 CFR 787A.6
129	09/30/1996	CONOTOXIN MI	France	138021	N/A	15 CFR 787A.6
130	10/03/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	138231	N/A	15 CFR 787A.6
131	10/04/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Israel	138307	N/A	15 CFR 787A.6
132	10/07/1996	TETRODOTOXIN CITRATE	Switzerland	138463	N/A	15 CFR 787A.6
133	10/08/1996	TETRODOTOXIN	Brazil	138466	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
134	10/08/1996	TETRODOTOXIN CITRATE	Germany	138473	N/A	15 CFR 787A.6

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135	10/09/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Spain	138566	N/A	15 CFR 787A.6
136	10/14/1996	OMEGA-CONOTOXIN MVIIC	Korea	138875	N/A	15 CFR 787A.6
137	10/15/1996	TETRODOTOXIN	Germany	138901	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
138	10/15/1996	TETRODOTOXIN CITRATE	Italy	138902	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
139	10/17/1996	TETRODOTOXIN	United Kingdom	139062	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
140	10/18/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	139196	N/A	15 CFR 787A.6
141	10/18/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	139197	N/A	15 CFR 787A.6
142	10/21/1996	OMEGA-CONOTOXIN GVIA TFA SALT	France	139254	N/A	15 CFR 787A.6
143	10/22/1996	TETRODOTOXIN	Norway	139345	N/A	15 CFR 787A.6
144	10/24/1996	TETRODOTOXIN	Taiwan	139538	N/A	15 CFR 787A.6
145	10/25/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	139639	N/A	15 CFR 787A.6
146	10/28/1996	TETRODOTOXIN	Belgium	139737	N/A	15 CFR 787A.6
147	10/29/1996	TETRODOTOXIN CITRATE	Switzerland	139828	N/A	15 CFR 787A.6
148	10/30/1996	TETRODOTOXIN CITRATE	Spain	139917	N/A	15 CFR 787A.6
149	10/31/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	140038	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
150	10/31/1996	TETRODOTOXIN CITRATE	United Kingdom	140048	N/A	15 CFR 787A.6
151	11/01/1996	TETRODOTOXIN	Australia	140096	N/A	15 CFR 787A.6
152	11/06/1996	TETRODOTOXIN	Germany	140312	N/A	15 CFR 787A.6
153	11/08/1996	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC TETRODOTOXIN	Germany	140488	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
154	11/08/1996	TETRODOTOXIN CITRATE	Japan	140502	N/A	15 CFR 787A.6
155	11/11/1996	TETRODOTOXIN CITRATE	Poland	140563	N/A	15 CFR 787A.6
156	11/12/1996	TETRODOTOXIN	Germany	140635	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
157	11/12/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Italy	140626	N/A	15 CFR 787A.6
158	11/12/1996	TETRODOTOXIN CITRATE	United Kingdom	140634	N/A	15 CFR 787A.6

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159	11/12/1996	TETRODOTOXIN	Hong Kong	140633	N/A	15 CFR 787A.6
160	11/13/1996	OMEGA-CONOTOXIN GVIA TFA SALT	Spain	140730	N/A	15 CFR 787A.6
161	11/15/1996	TETRODOTOXIN CITRATE	Hungary	140901	N/A	15 CFR 787A.6
162	11/15/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Uruguay	140902	N/A	15 CFR 787A.6
163	11/18/1996	TETRODOTOXIN CITRATE	France	140956	N/A	15 CFR 787A.6
164	11/19/1996	TETRODOTOXIN	Spain	141040	N/A	15 CFR 787A.6
165	11/20/1996	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	141128	N/A	15 CFR 787A.6
166	11/22/1996	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Germany	141240	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
167	11/25/1996	TETRODOTOXIN SAXITOXIN	Taiwan	141299	N/A	15 CFR 787A.6
168	11/26/1996	TETRODOTOXIN CITRATE	Kuwait	132616	N/A	15 CFR 787A.6 15 CFR 787A.6
169	11/26/1996	TETRODOTOXIN	Germany	141398	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
170	11/26/1996	TETRODOTOXIN	Italy	141399	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
171	11/27/1996	MICROCYSITIN-LR	Japan	141537	N/A	15 CFR 787A.6
172	11/27/1996	TETRODOTOXIN CITRATE	Hungary	141549	N/A	15 CFR 787A.6
173	12/03/1996	TETRODOTOXIN	Spain	141652	N/A	15 CFR 787A.6
174	12/03/1996	TETRODOTOXIN	Portugal	141659	N/A	15 CFR 787A.6
175	12/04/1996	TETRODOTOXIN CITRATE	Mexico	141734	N/A	15 CFR 787A.6
176	12/06/1996	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	141928	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
177	12/06/1996	TETRODOTOXIN	United Kingdom	141924	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
178	12/06/1996	TETRODOTOXIN	France	141923	N/A	15 CFR 787A.6
179	12/09/1996	TETRODOTOXIN	Taiwan	142052	N/A	15 CFR 787A.6
180	12/10/1996	TETRODOTOXIN CITRATE	Hungary	142098	N/A	15 CFR 787A.6
181	12/11/1996	MICROCYSITIN-LR TETRODOTOXIN	Germany	142168	N/A	15 CFR 787A.6
182	12/13/1996	MICROCYSITIN-LR	Japan	142334	N/A	15 CFR 787A.6
183	12/13/1996	TETRODOTOXIN CITRATE	Spain	142335	N/A	15 CFR 787A.6

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184	12/17/1996	OMEGA-CONOTOXIN MVIIC	Germany	142561	N/A	15 CFR 787A.6
185	12/20/1996	TETRODOTOXIN CITRATE	Japan	142799	N/A	15 CFR 787A.6
186	12/23/1996	TETRODOTOXIN	Germany	142896	G-DEST	15 CFR 787A.6 15 CFR 787A.5(a)(1)
187	12/23/1996	TETRODOTOXIN	France	142893	N/A	15 CFR 787A.6
188	12/30/1996	TETRODOTOXIN	Korea	143010	N/A	15 CFR 787A.6
189	12/31/1996	MICROCYSSTIN-LR	Japan	143074	N/A	15 CFR 787A.6
190	12/31/1996	TETRODOTOXIN	Taiwan	143076	N/A	15 CFR 787A.6
191	01/03/1997	OMEGA-CONOTOXIN MVIIC	Germany	143136	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
192	01/10/1997	TETRODOTOXIN CITRATE	Argentina	143509	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
193	01/10/1997	OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Denmark	143515	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
194	01/14/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	143675	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
195	01/14/1997	TETRODOTOXIN	Taiwan	143750	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
196	01/14/1997	TETRODOTOXIN CITRATE	Netherlands	143680	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
197	01/15/1997	TETRODOTOXIN CITRATE	Switzerland	143757	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
198	01/15/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Hungary	143752	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
199	01/16/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	143832	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
200	01/17/1997	TETRODOTOXIN	Germany	143907	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
201	01/20/1997	TETRODOTOXIN CITRATE	Finland	144029	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
202	01/20/1997	TETRODOTOXIN	Netherlands	144022	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
203	01/21/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	144138	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
204	01/24/1997	OMEGA-CONOTOXIN MVIIC OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Japan	144371	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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205	01/24/1997	TETRODOTOXIN CITRATE	Germany	144376	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
206	01/24/1997	TETRODOTOXIN CITRATE	Belgium	144460	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
207	01/27/1997	TETRODOTOXIN	Italy	144473	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
208	01/27/1997	TETRODOTOXIN	France	144471	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
209	01/28/1997	OMEGA-CONOTOXIN MVIIC TETRODOTOXIN	Germany	144570	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
210	01/31/1997	TETRODOTOXIN CITRATE	France	144836	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
211	01/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Australia	144850	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
212	01/31/1997	TETRODOTOXIN CITRATE	Japan	144878	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
213	01/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Germany	144849	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
214	01/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT	New Zealand	144846	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
215	01/31/1997	OMEGA-CONOTOXIN MVIIC	Australia	144851	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
216	02/05/1997	TETRODOTOXIN	France	145110	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
217	02/05/1997	TETRODOTOXIN CITRATE	Belgium	145183	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
218	02/07/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	145275	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
219	02/07/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Israel	145277	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
220	02/10/1997	TETRODOTOXIN	Australia	145404	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
221	02/12/1997	TETRODOTOXIN CITRATE	Italy	145455	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
222	02/12/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	United Kingdom	145538	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
223	02/13/1997	TETRODOTOXIN	France	145612	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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224	02/17/1997	TETRODOTOXIN CITRATE	Spain	145760	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
225	02/17/1997	TETRODOTOXIN	Korea	145761	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
226	02/18/1997	OMEGA-CONOTOXIN MVIIC	France	145836	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
227	02/18/1997	TETRODOTOXIN	Taiwan	145838	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
228	02/18/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	145837	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
229	02/20/1997	TETRODOTOXIN CITRATE	Sweden	146067	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
230	02/20/1997	TETRODOTOXIN CITRATE	United Kingdom	145970	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
231	02/21/1997	TETRODOTOXIN	Germany	146080	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
232	02/21/1997	TETRODOTOXIN CITRATE	Japan	146092	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
233	02/24/1997	TETRODOTOXIN CITRATE	United Kingdom	146189	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
234	02/24/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Taiwan	146185	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
235	02/27/1997	TETRODOTOXIN CITRATE	United Kingdom	146478	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
236	02/28/1997	TETRODOTOXIN CITRATE	Japan	146577	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
237	02/28/1997	TETRODOTOXIN TETRODOTOXIN CITRATE	Germany	146571	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
238	02/28/1997	TETRODOTOXIN	Taiwan	146578	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
239	02/28/1997	TETRODOTOXIN CITRATE	Sweden	146667	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
240	03/03/1997	OMEGA-CONOTOXIN MVIIC	Korea	146675	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
241	03/03/1997	TETRODOTOXIN CITRATE	France	146676	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
242	03/04/1997	TETRODOTOXIN CITRATE	Sweden	146764	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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243	03/05/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	United Kingdom	146857	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
244	03/07/1997	TETRODOTOXIN CITRATE	Germany	147038	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
245	03/14/1997	TETRODOTOXIN CITRATE	Japan	147508	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
246	03/17/1997	TETRODOTOXIN CITRATE	Switzerland	147588	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
247	03/17/1997	OMEGA-CONOTOXIN MVIIC	Germany	147590	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
248	03/17/1997	TETRODOTOXIN	France	147586	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
249	03/18/1997	OMEGA-CONOTOXIN MVIIC	France	147675	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
250	03/20/1997	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	147872	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
251	03/24/1997	TETRODOTOXIN CITRATE	Japan	147942	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
252	03/24/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	148037	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
253	03/25/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	148157	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
254	03/26/1997	TETRODOTOXIN	France	148229	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
255	03/26/1997	TETRODOTOXIN CITRATE	United Kingdom	148230	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
256	03/27/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC TETRODOTOXIN CITRATE	France	148329	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
257	03/28/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	148414	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
258	03/31/1997	TETRODOTOXIN	Norway	148555	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
259	04/02/1997	OMEGA-CONOTOXIN MVIIC TETRODOTOXIN CITRATE	Mexico	148589	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
260	04/02/1997	TETRODOTOXIN CITRATE	Austria	148591	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)

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261	04/03/1997	OMEGA-CONOTOXIN GVIA TFA SALT	France	148593	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
262	04/04/1997	TETRODOTOXIN CITRATE	Japan	148769	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
263	04/04/1997	TETRODOTOXIN	Germany	148770	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)
264	04/04/1997	TETRODOTOXIN CITRATE	Taiwan	148767	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)(1)

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY

In the Matter of:

Sigma-Aldrich Business Holdings, Inc.;

Sigma-Aldrich Corporation; and

Sigma-Aldrich Research Biochemicals, Inc.

Respondents

Case No. 01-BXA-06

Case No. 01 BXA-07

Case No. 01-BXA-11

BEFORE: PETER A. FITZPATRICK
ADMINISTRATIVE LAW JUDGE

ORDER DENYING RESPONDENTS' MOTIONS FOR SUMMARY DECISION

I.
OVERVIEW

1. These proceedings arise from three separate complaints issued by the Bureau of Industry and Security ("BIS" or "Agency"), formerly the Bureau of Export Administration, against Respondents Sigma-Aldrich Business Holdings (SABH) on March 23, 2001; Sigma-Aldrich Corporation (SAC) on April 2, 2001; and Sigma-Aldrich Research Biochemicals (SARB) on May 29, 2001. The complaints issued by the Agency allege identical violations of the U.S. export control regulations relating to the export of goods without the required license, making false or misleading statements, and failure to maintain records. *See*, 15 CFR Parts 768-799 (1995); 15 CFR Parts 768-799 (1996); and 15 CFR Parts 730-774 (2000).¹ The Agency

¹ The violations at issue occurred from 1995 through 1998. As such, the regulations governing the violations at issue are found in the 1995 through 1998 versions of the Code of Federal regulations: 15 C.F.R. Parts 768-799 (1995); 15 C.F.R. Parts 768-799 (1996), as amended (61 *Fed Reg.* 12714, March 25, 1996); and 15 C.F.R. Parts 730-774 (1997-1998). The March 25, 1996 *Federal Register* publication re-designated, but did not republish, the regulations existing at that time as 15 C.F.R. Part 768A-799A. In addition, the March 25, 1996 *Federal Register* publication restructured and reorganized the regulations, designating

seeks to impose liability on Respondents SABH and SAC as successors in interest to Research Biochemicals Limited Partnership (RBLP), a company that sold its partnership interests to these Respondents on April 9, 1997. In addition, the Agency seeks to impose liability against Respondent SARB as both a successor for violations occurring before the transfer of interest on April 9, 1997 and as the actual wrongdoer for violations occurring after the transfer.

These proceedings were transferred to the United States Coast Guard, Administrative Law Judge Docketing Center, for adjudication pursuant to an interagency agreement between BIS and the Coast Guard dated May 19, 1999. See also 50 USC §2412(d), 5 USC §3344, and 5 CFR §930.213. That agreement was renewed annually and is still in effect. The above captioned cases were assigned to the undersigned and were consolidated on July 5, 2001.

On March 5, 2002, Respondents filed Motions for Summary Decision pursuant to 15 CFR § 766.8 (2002), seeking the dismissal of all charges against Respondents SAC and SABH as successors in interest and all against SARB relating to exports that allegedly took place prior to April 9, 1997. In addition, Respondent SARB moves for Summary Decision dismissing all charges relating to the exports of a toxic chemical, tetrodotoxin citrate, which Respondents assert was not listed as a controlled item requiring a license at the time of the alleged exports. Also, Respondent SARB moves to dismiss all requests by the Agency for an order denying the Respondent's export privileges or right to practice before the Bureau of Industry and Security. Similarly, in the event SAC's and SABH's motions are denied, they move, in the alternative, for Summary Decision dismissing all charges against them relating to exports of tetrodotoxin citrate and all requests for an order denying their export privileges before BIS.

them as an interim rule at 15 C.F.R. Parts 730-774, effective April 24, 1996. The former regulations define the various violations that BIS alleges occurred from 1995 through December 31, 1996. The current regulations define the various violations that BIS alleges occurred on or after January 1, 1997.

On March 28, 2002, the Agency's Opposition to Respondents' Motions for Summary Judgment was filed. The Respondents' filed a reply brief on April 5, 2002. Oral arguments were presented at a hearing on the motions on June 6, 2002 in Baltimore, Maryland. Anstruther Davidson, Esq. and Melissa B. Mannino, Esq. represented the Agency at the hearing. Counsel for the Respondents were Aaron X. Fellmeth, Esq., Stanley Marcuss, Esq., and Rodney F. Page, Esq., Brian Cave LLP, Washington, D.C.²

2. Summary judgment is appropriate only where there is no genuine issue of material fact and where the moving party is entitled to a judgment as a matter of law. *See*, 15 C.F.R. § 766.8. One of the principal purposes of the summary decision or judgment is to isolate and dispose of factually unsupported claims or defenses. *Celotex Corp. v. Catrett*, 477 U.S. 317 (1986). Disputes over facts that might affect the outcome will preclude the entry of summary judgment. *See, Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242 (1986). When reviewing pleadings, affidavits and other evidence, the court must draw all reasonable, factual inferences in favor of the nonmoving party. In short, summary judgment is appropriate if the evidence is such that no reasonable fact finder could return a verdict for the nonmoving party. *See Lewis v. State of Oklahoma ex rel. Bd. of Regents for Tulsa Community College*, 2002 WL 1316810 (2002); *see also, Miccosukee Tribe of Indians of Florida v. South Florida Water Management Dist.*, 280 F.3d 1364, 1367 (2002).

3. At the hearing, the Respondents' Motion for Summary Decision was denied with respect to their argument that BIS lacks the statutory authority to impose a denial of export privileges. More specifically, I followed the reasoning in *Iran Air v. Kugelman*, 996 F. 2d 1253

² At the hearing I announced that good cause exists in this case to extend the one year period imposed at 15 CFR § 766.17 for disposition of the case including review by the Under Secretary. The issues raised here are complex and every effort has been made to accommodate the joint recommendations of the

(D.C. Cir. 1993), which held that applicable statutes and agency regulations are deemed precedent, and once the agency has ruled on a given matter, it is not open for re-argument. *See* 996 F.2d at 1260. In this case, the Export Administration Regulations (EAR) provide for the denial of export privileges as a possible penalty for violations of the export control regulations; therefore, there is no basis before this forum for invalidating the clear rule and practice of the Agency. *See*, 15 CFR § 764.3(a)(2).

4. Additionally, the Respondents' raise the following issues, which will be addressed in greater detail:

- (a) All charges in the Charging Letters based on the alleged impermissible exports of tetrodotoxin citrate must be dismissed because the EAR does not prohibit exports of that specific mixture without a license.
- (b) There is no statutory basis or precedent for the creation of successor liability under the EAR.
- (c) Alternatively, even if successor liability were permissible under the Export Control Regulations, it would be unfair to impose liability on these innocent purchasers when the predecessor is capable of providing relief. Moreover, each Respondent here cannot simultaneously have been the successor to RBLP's business.
- (d) Finally, all charges against Respondents SAC and SABH should be dismissed because they cannot be regarded as successors to RBLP's business since only partnership interests, not assets, were acquired.

parties regarding the schedule of the litigation. The case will move forward as expeditiously as possible. See Transcript 4-5.

After reviewing these arguments and reviewing the transcript, pleadings and exhibits, I find that the Respondents' are not entitled to Summary Decision as a matter of law. Also, issues of material fact remain to be decided.

II.

DISCUSSION

1. Several of the charges against the Respondents relate the export without a license of tetrodotoxin citrate, a toxic compound. Tetrodotoxin is listed as a controlled toxin on the Commerce Control List (CCL) under the Export Control Classification Number (ECCN) 1C351. *See* 15 CFR § 774, Supp. 1. Tetrodotoxin citrate is tetrodotoxin packaged in a citrate buffer as a protective measure. As such, tetrodotoxin citrate is not a chemical derivative of tetrodotoxin but rather a mixture of tetrodotoxin and citric acid. Exporting tetrodotoxin in a citrate buffer is similar to exporting it in packaging material. Therefore, it requires a license from the Department of Commerce before being exported from the United States to the destinations listed in the Charging Letters.

Respondents acknowledge that tetrodotoxin citrate is a mixture that contains tetrodotoxin but urge that since mixtures are specifically discussed elsewhere in the EAR, but not in the section pertaining to tetrodotoxin, the regulations here exclude coverage of tetrodotoxin mixtures. It is clear, however, from the language used throughout the EAR that sections pertaining to mixtures have the specific effect of excluding items from control rather than including them. Without that language, a mixture containing any quantity of a controlled substance, regardless of how minute, would be controlled. In essence, this language excludes select mixtures for the benefit of exporters. Although there is specific language in ECCN 1C351 that excludes certain items, such as vaccines and immunotoxins, from coverage, similar exclusion language is not included in ECCN 1C351 for mixtures. Therefore, it is apparent that

while the words "tetrodotoxin citrate" are not on the list, tetrodotoxin citrate, as a mixture of tetrodotoxin, is covered by ECCN 1C351 and its predecessor entry, ECCN 1C61B. *See*, 15 CFR §744, Supp 1.

2. Successor liability can be applied under the export control regulations. First, the International Emergency Economic Powers Act (IEEPA) imposes liability on any "person" who commits a violation.³ More specifically, a civil penalty up to \$10,000 may be imposed on any "person" who violates a license, order or regulation. *See*, 50 USC § 1705. For violations occurring after October 23, 1996, the maximum fine is \$11,000. *See*, 28 USC 2461, *see also* 15 CFR 6.4(A)(2). Under the federal rules of statutory construction, the term "person" includes "corporations, companies, association, firms, partnerships, societies and joint stock companies, as well as individuals." 1 USC §1. The federal rules of statutory construction further inform us that when "company" or "association" are used in reference to a corporation, they shall be deemed to include successors and assigns. *See*, 1 USC § 5. By implication, Congress must have considered the word "corporation" to include corporate successors. *See*, *U.S. v. Mexico Feed and Seed Co., Inc.*, 980 F.2d 478, (8th Cir. 1992); *see also*, *B.F. Goodrich v. Betkoski*, 99 F.3d 505 (2nd Cir. 1996)

In addition, the export regulations evince a clear intent to apply their remedies beyond just the "persons" who commit violations. For example, the term "person" is specifically defined

³ The Export Administration Regulations were issued under the Export Administration Act of 1979, as amended 50 U.S.C.A. §§ 2401-2420 (1991 & Supp 2000). Although the Act expired on August 20, 1994, Executive Order 1294, which has been extended by successive Presidential Notices, continued the Regulations in effect under the International Emergency Economic Powers Act. *See* 50 U.S. CA 1701-1706 (1991 & Supp 2000).

in the EAR as “a natural person, including a citizen or national of the United States of any foreign country; any firm; any government, government agency, government department, or government commission; any labor union; any fraternal or social organization; and any other association or organization whether or not organized for profit.” *See*, 15 CFR §772.1. The intent to apply remedies to successors is reflected in the provision governing “related persons,” which states in part that orders affecting export privileges may be applied “not only to the respondent, but also to other persons then or thereafter related to the respondent by ownership, control, position of responsibility, affiliation, or other connection in the conduct of trade or business.” *See*, 15 CFR § 766.23(a). As such, both the language and intent of the IEEPA and EAR strongly suggest that “successors” should not be excluded from liability.

3. In order to address the issue of whether the Respondents assumed liability under the export control regulations when they purchased the assets and partnership interests of a predecessor company, the traditional rules of successor liability must be applied. A number of courts have recognized the importance of national uniformity, rather than the successor liability law of a particular state. *See, Smith Land & Imp. Corp. v. Celotex Corp.*, 851 F.2d 86 (3rd Cir. 1988) (instructing District Court to consider national uniformity in resolving successor liability issues under CERCLA); *see also, U.S. v. Mexico Feed and Seed Co*, 980 F.2d at 487 (upholding the application of federal law); *Louisiana-Pacific Corp. v. Asarco, Inc.*, 909 F.2d 1260 (9th Cir. 1990) (deeming appropriate a federal rule that relies on traditional common law notions because of the need for national uniformity).

Under these traditional rules, asset purchasers are not liable as successors unless one of the following four exceptions applies: (1) The purchasing corporation expressly or impliedly agrees to assume the liability; (2) The transaction amounts to a de facto consolidation or merger;

(3) The purchasing corporation is merely a continuation of the selling corporation; or (4) The transaction was fraudulently entered into in order to escape liability. See, *Allied Corp. v. Acme Solvents Reclaiming, Inc.*, 812 F.Supp. 124 (N.D. Ill. 1993); see also, *Atlantic Richfield Co. v. Blosenski* 847 F.Supp. 1261 (E.D. Pa. 1994); *Sylvester Bros. Development Co. v. Burlington Northern R.R.*, 772 F.Supp. 443 (D. Minn. 1990); *U.S. v. Carolina Transformer Co.*, 978 F.2d 832 (4th Cir. 1992); *U.S. v. Mexico Feed and Seed Co., Inc.*, 980 F.2d 478, (8th Cir. 1992); *Canadyne-Georgia Corp. v. Cleveland*, 72 F.Supp.2d 1373 (M.D. Ga. 1999).

The exceptions to the traditional rules of successor liability prevent a corporation from escaping its liabilities merely by changing hats. As such, close scrutiny must be given to corporate realities, rather than a mechanical application of a multi-factor test. See, *Gallenberg Equipment, Inc. v. Agromac Intern., Inc.*, 10 F.Supp.2d 1050 (E.D. Wis. 1998). Therefore, in deciding whether to apply the mere continuation or de facto merger exception, several courts have held that there must be a transfer of assets and business from one corporation to another in exchange for securities. See, *Baker's Carpet Gallery, Inc. v. Mohawk Industries, Inc.*, 942 F.Supp.1464 (N.D. Ga. 1996); see also, *Liberty Mut. Ins. Co. v. Household Intern.*, 136 F.Supp.2d 5(D. Mas. 2001); *Gallenberg Equipment, Inc. v. Agromac Intern., Inc.*, 10 F.Supp.2d 1050 (E.D. Wis. 1998). At the very least, there must be some sort of continuation of the stockholders' ownership interests. See, *Taylor v. Atlas Safety Equip. Co., Inc.*, 808 F.Supp. 1246 (E.D. Va. 1992); see also, *Crawford Harbor Associates v. Blake Const. Co., Inc.*, 661 F.Supp. 880 (E.D. Va. 1987). Even if the corporation sells its entire business operation and all its assets to another corporation, in exchange for some consideration other than stock, the two corporate entities remain distinct and intact. See, *Bud Antle, Inc. v. Eastern Foods, Inc.*, 758 F.2d 1451 (11th Cir. 1985); see also, *Harris v. T.I., Inc.*, 413 S.E.2d 605 (Va. 1992); see also, *Ney v.*

Landmark Educ. Corp., 16 F.3d 410 (1994); *Liberty Mut. Ins. Co. v. Household Intern*, 136 F.Supp.2d 5 (D. Mass. 2001). For example, where the assets are sold for cash rather than stock, no basic fundamental change occurs in the relationship of the stockholders to their respective corporations. See, *Bud Antle, Inc. v. Eastern Foods, Inc.*, 758 F.2d at 1458. Given the absent continuity of shareholder interest, the two corporations remain strangers, both before and after the sale. See, *Bud Antle, Inc. v. Eastern Foods, Inc.*, 758 F.2d at 1457.

Several courts however have applied a broadened "mere continuation" theory commonly known as the "substantial continuity" exception, which eliminates the requirement for a continuity of shareholders. See, *Gould, Inc. v. A & M Battery and Tire Service*, 950 F.Supp. 653 (M.D. Pa. 1997); see also, *B.F. Goodrich v. Betkoski*, 99 F.3d 505 (2nd Cir. 1996). Under this theory, a literal "purchase" of assets is not required to establish successor liability so long as there is some form of a "transfer" of assets. See, *State of N.Y. v. N. Storonske Cooperage Co., Inc.*, 174 B.R. 366 (N.D. N.Y. 1994). Among the factors to be considered under the "substantial continuity" approach are whether the successor: (1) retains the same employees, supervisory personnel and the same production facilities in the same location; (2) continues production of the same products; (3) retains the same business name; (4) maintains the same assets and general business operations; and (5) holds itself out to the public as a continuation of the previous corporation. See, *Allied Corp. v. Acme Solvents Reclaiming, Inc.*, 812 F.Supp. 124 (N.D. Ill. 1993); see also, *Atlantic Richfield Co. v. Blosenski* 847 F.Supp. 1261 (E.D. Pa. 1994); *Gould, Inc. v. A & M Battery and Tire Service*, 950 F.Supp. 653 (M.D. Pa. 1997).

Although the substantial continuity exception has been interpreted to require knowledge of potential liability on the part of the successor corporation, at least one court has held that knowledge can be inferred from the facts, taken in totality of the circumstances. See, *Gould, Inc.*

v. A & M Battery and Tire Service, 950 F.Supp. 653 (M.D.Pa. 1997). For example, it is easy to infer knowledge or notice when the successor holds itself out as the continuation of the previous enterprise by retaining the same employees, the same supervisory personnel, the same production facilities in the same location, produces the same product, and maintains a continuity of assets and the general business operations. *See*, 950 F.Supp. at 659.

The policy behind applying the more flexible substantial continuity exception to successor liability is to preclude responsible parties from using corporate formalities to escape liability. To date, the test has been used in the context of both labor relations, and federal environmental regulations. *See, Musikiwamba v. ESSI, Inc.*, 760 F.2d 740 (7th Cir. 1985); *see also, U.S. v. Mexico Feed and Seed Co., Inc.*, 980 F.2d 478, (8th Cir. 1992). The substantial continuity theory would be an appropriate test for successor liability under the EAR.

4. The common law rules of successor liability and its exceptions generally apply regardless of whether the predecessor or successor organization was a corporation, individual, or some other form of business organization. *See, Tift v. Forage King Industries, Inc.*, 322 N.W.2d 14 (Wis. 1982); *see also, Baker v. Dorfman*, 2000 WL 1010285 (S.D.N.Y. 2000); *Carter Enterprises, Inc. v. Ashland Specialty Co., Inc.*, 257 B.R. 797 (S.D. W.Va. 2001). In addition, responsible parties may be held jointly and severally liable. *See, Oner II, Inc. v. E.P.A.*, 597 F.2d 184 (19th Cir. 1979) (Agency was allowed to charge more than one respondent for successor liability under the doctrine of joint and several liability).

In addition, the doctrine of successor liability may be applied even when the Agency does not assert charges against the predecessor corporation. As such, the Respondents' assertion that RBLP, as the predecessor corporation, must be unavailable before its successors can be held liable, is unavailing. Instead, the more important question is whether the predecessor is merely a

hollow shell or an entity with assets answerable to judgments. Because it is not always the case that a corporation purchased by a second corporation disappears as a legal entity and cannot be sued, a successor business organization cannot avoid liability simply because its predecessor is a proper defendant. *See, Tift v. Forage King Industries, Inc.*, 322 N.W.2d 14 (Wis. 1982).

Rather, the successor corporations may be sued, as well as the original proprietorship. *See, id.*

In this case, the Respondents argue that although RBLP was dissolved under Delaware state law for failing to pay its taxes, it was sufficiently alive and existed at the time the action was instituted to permit it to be sued. However, when the Agency issued the charging letters, RBLP had transferred all of its assets, obligations, past contracts and liabilities to the Respondents. Moreover, given its status as a dissolved corporation, RBLP was prevented from conducting future business. Suffice it to say, RBLP was no longer viable as it existed for nearly five years (1997-2002). It was merely a legal formality and was devoid of any significant assets.

Finally, liability may be extended to successors corporations for the purpose of enforcing statutes by assessing civil penalties. Although Respondents contend that the successor liability doctrine was developed solely for remedial purposes, successor liability has been imposed to protect the public interest, as well as to prevent the purpose of federal regulations from being circumvented by corporate structuring formalities. For example, in *Oner II, Inc. v. E.P.A.*, 597 F.2d 184 (19th Cir. 1979), the District Court held that “an agency may pursue the objectives of the Act by imposing successor liability where it will facilitate enforcement of the Act.” *See*, 597 F.2d at 186. In *Oner II*, a successor corporation was held liable for violations of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) because the Agency’s authority to extend

liability to successor corporations stems from the purpose of the statute it administers. *See*, 597 F.2d at 186.

Just as the purpose of FIFRA is to regulate pesticides and protect the national environment, the primary objective behind the export control regulations is to protect the national security and safeguard the public from potential harm. More specifically, a review of the applicable regulations reveals that the export control provision of the EAR are designed to limit the military and terrorism support capacity of certain countries and to restrict the access of items, such as weapons of mass destruction, that may be used by countries or persons wishing to harm U.S. interests. *See*, 15 CFR 730.6. National security interest considerations are provided for in 15 CFR § 742.4, which states in part “it is the policy of the U.S. to restrict the export and re-export of items that would make a significant contribution of countries that would prove detrimental to the national security of the United States.” *See*, 15 CFR § 742.4(a). As such, successor liability would not only further the purpose of IEEPA and the EAR, but the policies behind the regulations would be sharply curtailed and the enforcement of the Act unnecessarily hampered if it was not applied.

5. Applying the rules of successor liability and its exemptions, Respondent SARB shows all of the hallmark signs of substantial continuity in the present case. Following the terms of the Bill and Sale and Assignment and Assumption Agreement, RBLP transferred all rights, title and interest in its assets to SARB on April 9, 1997. The Bill of Sale further defines the term assets to include “all assets, property, associated rights and interest, real, personal and mixed, tangible and intangible.” In addition, the Novation Agreement provided in the Bill of Sale reveals that SARB, as the transferee, agreed to fully perform all obligations under preexisting contracts and purchase orders. Similarly, SARB agreed to assume all preexisting liabilities and claims against

RBLP. The record further shows that after SARB acquired all business assets from RBLP, it continued RBLP's export practices without interruption. Thus, SARB appears to be a substantial continuation of RBLP's business as well as a successor in interest of that partnership.

Questions of fact arise regarding the precise nature of the relationship between all the Respondents in this transaction. First, according to the Purchase Agreement signed on April 9, 1997, approximately \$18 million dollars was paid by Respondents SAC and SABH in return for 100% of RBLP's partnership units. The partnership units were split between the two corporations, with SAC acquiring approximately 1% and SABH acquiring approximately 99%. According to the Purchase Agreement, the transaction was arrived at by arms-length negotiations and properly reflected fair market value. Moreover, Article I of the Purchase Agreement clearly indicates that only partnership units were transferred, as there is no reference to an exchange of assets, obligations or liabilities. Ordinarily, Respondents SAC and SABH would not be considered successors in interest under the above scenario. An entity that holds partnership units in another company is not liable for that company's wrongdoing, unless it can be shown that the partners were controlling the operations of that company. However, the undersigned is not convinced that Respondents SAC and SABH purchased only RBLP's partnership units. According to the Declaration of Michael Hogan, RBLP sold all its assets and business to Respondent SARB. (Respondent Exhibit J, paragraph 9). Yet the record here is devoid of any consideration paid by Respondent SARB in exchange for RBLP's assets and business. The only consideration in evidence that was exchanged between any of the parties was the sum of \$18 million dollars allegedly paid by Respondents SAC and SABH for RBLP's partnership units. Therefore, the issue remains whether RBLP gratuitously transferred its assets and business to

Respondents SARB, or whether RBLP's assets and liabilities were first acquired by Respondents SAC and SABH before being transferred to Respondent SARB.

III.
ORDER

WHEREFORE,

IT IS HEREBY ORDERED that Respondents' Motions for Summary Decision on the grounds that tetrodotoxin citrate was not a controlled item requiring a license from the Department of Commerce at the time of the alleged exports is DENIED.

IT IS FURTHER ORDERED that Respondents' Motions for Summary Decision on the grounds that the export control regulations do not provide for successor liability is DENIED.

IT IS FURTHER ORDERED that Respondents' Motions for Summary Decision on the grounds that the Respondents can not be liable as successors in interest is DENIED.

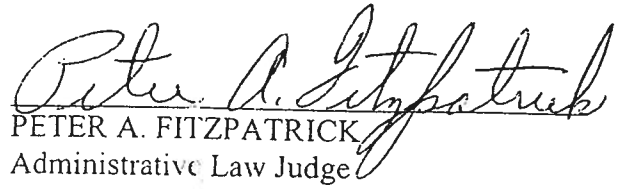
IT IS FURTHER ORDERED that Respondents' Motions for Summary Decision on the grounds that the Agency (BIS) lacks statutory authority to impose a denial of export privilege is DENIED.

IT IS FURTHER ORDERED that the hearing in this case will commence as follows:

November 4, 2002 @ 1330 hours
United States Custom House
United States Coast Guard
ALJ Courtroom, Room 403
40 South Gay Street
Baltimore, Maryland 21202

IT IS FURTHER ORDERED that the parties and their counsel, are **DIRECTED TO BE PRESENT** at the hearing with all of their witnesses and/or exhibits, or stipulations with the opposing party in lieu of same. The parties are to be fully prepared to proceed with the hearings

until they are concluded. Failure to appear as now directed, in the absence of any contrary instruction from the above office or for good cause shown, may result in an immediate ruling or disposition adverse to the failing party's interests.


PETER A. FITZPATRICK
Administrative Law Judge

Done and dated this 29 day of August 2002.
Norfolk, Virginia

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing by facsimile and e-mail to the following persons:

Anstruther Davidson, Esq. /Melissa Mannino, Esq.
Office of Chief Counsel for Bureau of Industry and Security
U.S. Department of Commerce
Room H-3839
14th & Constitution Avenue, N.W.
Washington , D.C. 20230
Phone: 202 482-5404
Fax: 202 482-0085

Stanley J. Marcuss, Jr., Esq.
Bryan Cave LLP
700 13th Street, N.W.
Washington, DC 20005-3960
Phone: 202-508-6074
Fax: 202-508-6200

Lucinda H. Shinault, CCA

Lucinda H. Shinault, CLA
Legal Assistant to the Administrative Law Judge

Done and dated August 27, 2002 at
Norfolk, Virginia

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

In the Matters of:)	
)	
Sigma Aldrich Business)	01-BXA-06
Holdings, Inc.,)	
)	
and)	
)	
Sigma Aldrich Corporation,)	01-BXA-07
)	
and)	
)	
Sigma Aldrich Research)	01-BXA-11
Biochemicals, Inc.,)	
)	
Respondents.)	(The Honorable Peter A. Fitzpatrick)
)	

SETTLEMENT AGREEMENT

This Settlement Agreement (Agreement) is made by and among Respondents, Sigma Aldrich Research Biochemicals, Inc. (SARBI), Sigma-Aldrich Corporation (SAC), and Sigma Aldrich Business Holdings, Inc. (SABH), (Respondents are collectively referred to as Sigma Aldrich); and the Bureau of Industry and Security, United States Department of Commerce (BIS) (collectively referred to as the Parties), pursuant to Section 766.18(b) of the Export Administration Regulations (15 C.F.R. Parts 730-774 (2002)) (the Regulations),¹ issued pursuant to the Export Administration Act of 1979, as amended (50

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2002). The alleged violations occurred from 1996 through 1998. The Regulations governing the alleged violations at issue are found in the 1996 through 1998 versions of the Code of Federal Regulations (15 C.F.R. 15 C.F.R. Parts 768-799 (1996), as amended (61 *Fed. Reg.* 12714, March 25, 1996)) (former Regulations), and 15 C.F.R. Parts 730-774 (1997-1998)). The March 25, 1996 *Federal Register* publication redesignated, but did not republish, the then-existing Regulations as 15 C.F.R. Parts 768A-799A. In addition, the March 25, 1996 *Federal Register* publication restructured and reorganized the Regulations, designating them as an interim rule at 15 C.F.R. Parts 730-774, effective April 24, 1996. The former Regulations define the various violations that BIS alleges occurred through December 31, 1996. The Regulations define the various violations that BIS alleges occurred on or after January 1, 1997 and establish the procedures that apply to this matter.

U.S.C. app. §§ 2401-2420 (1994 & Supp. V 1999)) (Act),² and which are currently maintained in force under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 - 1706 (1994 & Supp. V 1999)).

WHEREAS, BIS has initiated an administrative proceeding against Sigma Aldrich, case numbers 01-BXA-06, 01-BXA-07, and 01-BXA-11, pursuant to the Act and the Regulations;

WHEREAS, Sigma Aldrich has received notice of issuance of the Charging Letters pursuant to Section 766.3(b) of the Regulations;

WHEREAS, Sigma Aldrich has reviewed the Charging Letters 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, Sigma Aldrich fully understands the terms of this Agreement and the Order that will be issued to give effect to this Settlement Agreement (Order);

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

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

²50 U.S.C. app. 2401- 2420 (1994 & Supp. V 1999). From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential Notices, the last of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 - 1706 (1994 & Supp. V 1999)) (IEEPA). On November 13, 2000, the Act was reauthorized by Pub. L. No. 106-508 and it remained in effect through August 20, 2001. Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222, which has been extended by a Presidential Notice of August 14, 2002 (67 *Fed. Reg.* 159 (August 16, 2002)), has continued the Regulations in effect under IEEPA. The Act and Regulations are available on the Government Printing Office website at: <http://w3.access.gpo.gov/bis/>.

WHEREAS, this Settlement Agreement constitutes neither an admission nor denial of the allegations contained in the Charging Letters;

WHEREAS, Sigma Aldrich wishes to settle and dispose of all matters alleged in the Charging Letters by entering into this Agreement; and

WHEREAS, Sigma Aldrich agrees to be bound by the Order, when entered;

NOW THEREFORE, the Parties hereby agree as follows:

1. BIS has jurisdiction over Sigma Aldrich, under the Regulations, in connection with the matters alleged in the Charging Letters.

2. BIS and Sigma Aldrich shall settle the administrative cases against Sigma Aldrich with a civil penalty based on the following 318 charges:

- a. *80 Violations of 15 C.F.R. §§ 787A.6 and 764.2(a): Exporting Biological Toxins without the Required Department of Commerce Export Licenses.*

BIS alleges that on 80 occasions, from on or about December 20, 1996 through on or about April 4, 1997, Research Biochemicals Limited Partnership (RBLP), a firm that Sigma-Aldrich later acquired, exported from the United States biological toxins, namely omega conotoxin MVIIC, omega conotoxin GVIA TFA salt, tetrodotoxin, tetrodotoxin citrate, and microcystin-lr, to various destinations, including France, Sweden, Netherlands, Germany, Korea, United Kingdom, Japan and Taiwan, without obtaining the required Department of Commerce licenses. The biological toxins were covered by export control classification number (ECCN) 1C61B of the former Regulations and ECCN 1C351 of the Regulations. Pursuant to Section 778.8(a) of the former Regulations and Section 742.2 of the Regulations, a Department of Commerce export license was required to export the biological toxins from the United States to the specified destinations. SARBI, as the successor of RBLP, is liable for these violations of the former

Regulations and Regulations. For further details, see attachment A, which is enclosed and incorporated herein by reference.

- b. *188 Violations of 15 C.F.R § 764.2(a): Exporting Biological Toxins without the Required Department of Commerce Export Licenses.*

BIS alleges that on 188 occasions, from on or about April 10, 1997 through on or about April 27, 1998, SARBI exported from the United States biological toxins, namely omega conotoxin MVIIC, omega conotoxin GVIA TFA salt, tetrodotoxin, tetrodotoxin citrate, and microcystin-lr, to various destinations, including France, Netherlands, Germany, Turkey, India, Korea, United Kingdom, Japan and Taiwan, without obtaining the required Department of Commerce export licenses. The biological toxins were covered by ECCN 1C351 of the Regulations. Pursuant to Section 742.2 of the Regulations, a Department of Commerce export license was required to export the biological toxins from the United States to the specified destinations. For further details, see attachment B, which is enclosed and incorporated herein by reference.

- c. *25 Violations of 15 C.F.R. §764.2(g) - Material Misrepresentations on Shipper's Export Declarations Concerning Authority to Export.*

BIS alleges that on 25 occasions, from on or about April 24, 1997 through on or about November 18, 1997, SARBI made or caused to be made false and misleading statements of material fact to an official of the U.S. Government by filing or causing to be filed 25 Shipper's Export Declarations³ (SEDs) that stated that no license was required (NLR) for the export of the biological toxins from the United States to their specified destinations. These statements were false, as the biological toxins that were the subject of the SEDs required licenses from the Department of Commerce for export. See attachment B.

³ Shipper's Export Declarations are export control documents, as defined in Part 772 of the Regulations.

d. *25 Violations of 15 C.F.R. § 764.2(i) - Failure to Keep the Required Records.*

BIS alleges that on 25 occasions, from April 22, 1997 through on or about June 1, 1997, SARBI failed to maintain records, including copies of Shipper's Export Declarations and air waybills, for exports that it made as required by Section 762.2 of the Regulations. See attachment B.

3. In complete settlement and satisfaction of case numbers 01-BXA-06, 01-BXA-07, and 01-BXA-11 and withdrawal of the Charging Letters from adjudication in those cases:

- a. SARBI shall be assessed a civil penalty in the amount of \$1,760,000. Payment of the civil penalty shall be made to the U.S. Department of Commerce within 30 days from the date of entry of the Order. Payment of the civil penalty is guaranteed by SAC and SABH, SARBI's parent corporations.
- b. The timely payment of the civil penalty agreed to in paragraph 3.a. is hereby made a condition to the granting, restoration, or continuing validity of any export license, permission, or privilege granted, or to be granted, to Sigma Aldrich. Failure to make timely payment of the civil penalty set forth above shall result in the denial of all of Sigma Aldrich's export privileges for a period of one year from the date of imposition of the penalty.

4. Subject to the approval of this Agreement pursuant to paragraph 9 hereof, Sigma Aldrich hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violations of this Agreement or the Order, when entered), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in the Charging Letters; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, when entered; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, when entered.

5. Upon entry of the Order, BIS will not initiate any further administrative proceeding against Sigma Aldrich in connection with any violation of the Act or the Regulations arising out the transactions identified in the Charging Letters.

6. This Agreement and the Order, when entered, in addition to the record of these cases will be available to the public.

7. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement pursuant to Section 766.18(b) of the Regulations, no Party may use this Agreement in any administrative or judicial proceeding and the Parties shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding.

8. 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, when entered, nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the United States Government with respect to the facts and circumstances addressed herein.

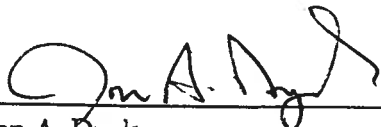
9. This Agreement shall become binding on BIS only when the Assistant Secretary of Commerce for Export Enforcement approves it by entering the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

Settlement Agreement
Sigma Aldrich
Page 7 of 7

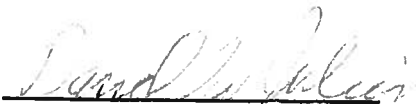
10. Each signatory affirms that he has authority to enter into this Settlement Agreement and to bind his respective party to the terms and conditions set forth herein.

BUREAU OF INDUSTRY AND SECURITY
U.S. DEPARTMENT OF COMMERCE

SIGMA ALDRICH RESEARCH
BIOCHEMICALS, INC.



Jon A. Dyck
Chief Counsel
Office of Chief Counsel
for Industry and Security

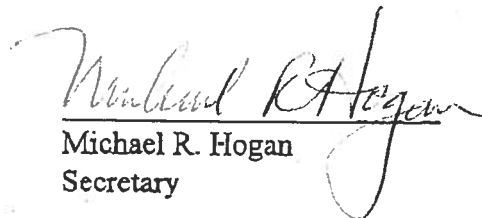


David Julien
President

Date: 10/28/02

Date: OCTOBER 18, 2002

SIGMA-ALDRICH CORPORATION



Michael R. Hogan
Secretary

OCTOBER 18, 2002
Date

SIGMA ALDRICH BUSINESS HOLDINGS, INC



Kirk Richter
Treasurer

OCTOBER 18, 2002
Date

**ATTACHMENT A
SIGMA ALDRICH RESEARCH BIOCHEMICALS, INC.
EXPORTS MADE BY RESEARCH BIOCHEMICALS LIMITED PARTNERSHIP**

EXPORT	EXPORT DATE	COMMODITY	DESTINATION	INVOICE	VIOLATIONS
1	12/20/1996	TETRODOTOXIN CITRATE	Japan	142799	15 CFR 787A.6
2	12/23/1996	TETRODOTOXIN	Germany	142896	15 CFR 787A.6
3	12/23/1996	TETRODOTOXIN	France	142893	15 CFR 787A.6
4	12/30/1996	TETRODOTOXIN	Korea	143010	15 CFR 787A.6
5	12/31/1996	MICROCYSTIN-LR	Japan	143074	15 CFR 787A.6
6	12/31/1996	TETRODOTOXIN	Taiwan	143076	15 CFR 787A.6
7	01/03/1997	OMEGA-CONOTOXIN MVIIC	Germany	143136	15 CFR 764.2(a)
8	01/10/1997	TETRODOTOXIN CITRATE	Argentina	143509	15 CFR 764.2(a)
9	01/10/1997	OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Denmark	143515	15 CFR 764.2(a)
10	01/14/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	143675	15 CFR 764.2(a)
11	01/14/1997	TETRODOTOXIN	Taiwan	143750	15 CFR 764.2(a)
12	01/14/1997	TETRODOTOXIN CITRATE	Netherlands	143680	15 CFR 764.2(a)
13	01/15/1997	TETRODOTOXIN CITRATE	Switzerland	143757	15 CFR 764.2(a)
14	01/15/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Hungary	143752	15 CFR 764.2(a)
15	01/16/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	143832	15 CFR 764.2(a)
16	01/17/1997	TETRODOTOXIN	Germany	143907	15 CFR 764.2(a)
17	01/20/1997	TETRODOTOXIN CITRATE	Finland	144029	15 CFR 764.2(a)
18	01/20/1997	TETRODOTOXIN	Netherlands	144022	15 CFR 764.2(a)
19	01/21/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	144138	15 CFR 764.2(a)
20	01/24/1997	OMEGA-CONOTOXIN MVIIC OMEGA CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Japan	144371	15 CFR 764.2(a)
21	01/24/1997	TETRODOTOXIN CITRATE	Germany	144376	15 CFR 764.2(a)
22	01/24/1997	TETRODOTOXIN CITRATE	Belgium	144460	15 CFR 764.2(a)
23	01/27/1997	TETRODOTOXIN	Italy	144473	15 CFR 764.2(a)
24	01/27/1997	TETRODOTOXIN	France	144471	15 CFR 764.2(a)
25	01/28/1997	OMEGA CONOTOXIN MVIIC TETRODOTOXIN	Germany	144570	15 CFR 764.2(a)
26	01/31/1997	TETRODOTOXIN CITRATE	France	144836	15 CFR 764.2(a)
27	01/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Australia	144850	15 CFR 764.2(a)
28	01/31/1997	TETRODOTOXIN CITRATE	Japan	144878	15 CFR 764.2(a)

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29	01/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Germany	144849	15 CFR 764.2(a)
30	01/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT	New Zealand	144846	15 CFR 764.2(a)
31	01/31/1997	OMEGA-CONOTOXIN MVIIC	Australia	144851	15 CFR 764.2(a)
32	02/05/1997	TETRODOTOXIN	France	145110	15 CFR 764.2(a)
33	02/05/1997	TETRODOTOXIN CITRATE	Belgium	145183	15 CFR 764.2(a)
34	02/07/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	145275	15 CFR 764.2(a)
35	02/07/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN	Israel	145277	15 CFR 764.2(a)
36	02/10/1997	TETRODOTOXIN	Australia	145404	15 CFR 764.2(a)
37	02/12/1997	TETRODOTOXIN CITRATE	Italy	145455	15 CFR 764.2(a)
38	02/12/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	United Kingdom	145538	15 CFR 764.2(a)
39	02/13/1997	TETRODOTOXIN	France	145612	15 CFR 764.2(a)
40	02/17/1997	TETRODOTOXIN CITRATE	Spain	145760	15 CFR 764.2(a)
41	02/17/1997	TETRODOTOXIN	Korea	145761	15 CFR 764.2(a)
42	02/18/1997	OMEGA-CONOTOXIN MVIIC	France	145836	15 CFR 764.2(a)
43	02/18/1997	TETRODOTOXIN	Taiwan	145838	15 CFR 764.2(a)
44	02/18/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	145837	15 CFR 764.2(a)
45	02/20/1997	TETRODOTOXIN CITRATE	Sweden	146067	15 CFR 764.2(a)
46	02/20/1997	TETRODOTOXIN CITRATE	United Kingdom	145970	15 CFR 764.2(a)
47	02/21/1997	TETRODOTOXIN	Germany	146080	15 CFR 764.2(a)
48	02/21/1997	TETRODOTOXIN CITRATE	Japan	146092	15 CFR 764.2(a)
49	02/24/1997	TETRODOTOXIN CITRATE	United Kingdom	146189	15 CFR 764.2(a)
50	02/24/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Taiwan	146185	15 CFR 764.2(a)
51	02/27/1997	TETRODOTOXIN CITRATE	United Kingdom	146478	15 CFR 764.2(a)
52	02/28/1997	TETRODOTOXIN CITRATE	Japan	146577	15 CFR 764.2(a)
53	02/28/1997	TETRODOTOXIN TETRODOTOXIN CITRATE	Germany	146571	15 CFR 764.2(a)
54	02/28/1997	TETRODOTOXIN	Taiwan	146578	15 CFR 764.2(a)
55	02/28/1997	TETRODOTOXIN CITRATE	Sweden	146667	15 CFR 764.2(a)
56	03/03/1997	OMEGA-CONOTOXIN MVIIC	Korea	146675	15 CFR 764.2(a)
57	03/03/1997	TETRODOTOXIN CITRATE	France	146676	15 CFR 764.2(a)
58	03/04/1997	TETRODOTOXIN CITRATE	Sweden	146764	15 CFR 764.2(a)

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59	03/05/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	United Kingdom	146857	15 CFR 764.2(a)
60	03/07/1997	TETRODOTOXIN CITRATE	Germany	147038	15 CFR 764.2(a)
61	03/14/1997	TETRODOTOXIN CITRATE	Japan	147508	15 CFR 764.2(a)
62	03/17/1997	TETRODOTOXIN CITRATE	Switzerland	147588	15 CFR 764.2(a)
63	03/17/1997	OMEGA-CONOTOXIN MVIIC TETRODOTOXIN	Germany	147590	15 CFR 764.2(a)
64	03/17/1997	TETRODOTOXIN	France	147586	15 CFR 764.2(a)
65	03/18/1997	OMEGA-CONOTOXIN MVIIC	France	147675	15 CFR 764.2(a)
66	03/20/1997	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	147872	15 CFR 764.2(a)
67	03/24/1997	TETRODOTOXIN CITRATE	Japan	147942	15 CFR 764.2(a)
68	03/24/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	148037	15 CFR 764.2(a)
69	03/25/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	148157	15 CFR 764.2(a)
70	03/26/1997	TETRODOTOXIN	France	148229	15 CFR 764.2(a)
71	03/26/1997	TETRODOTOXIN CITRATE	United Kingdom	148230	15 CFR 764.2(a)
72	03/27/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC TETRODOTOXIN CITRATE	France	148329	15 CFR 764.2(a)
73	03/28/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	Germany	148414	15 CFR 764.2(a)
74	03/31/1997	TETRODOTOXIN	Norway	148555	15 CFR 764.2(a)
75	04/02/1997	OMEGA-CONOTOXIN MVIIC TETRODOTOXIN CITRATE	Mexico	148589	15 CFR 764.2(a)
76	04/02/1997	TETRODOTOXIN CITRATE	Austria	148591	15 CFR 764.2(a)
77	04/03/1997	OMEGA-CONOTOXIN GVIA TFA SALT	France	148593	15 CFR 764.2(a)
78	04/04/1997	TETRODOTOXIN CITRATE	Japan	148769	15 CFR 764.2(a)
79	04/04/1997	TETRODOTOXIN	Germany	148770	15 CFR 764.2(a)
80	04/04/1997	TETRODOTOXIN CITRATE	Taiwan	148767	15 CFR 764.2(a)

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VIOLATIONS COMMITTED BY SIGMA ALDRICH RESEARCH BIOCHEMICALS, INC.

EXPORT	EXPORT DATE	COMMODITY	DESTINATION	INVOICE	SED NOTATION	VIOLATIONS
1	04/10/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Taiwan	149127	N/A	15 CFR 764.2(a)
2	04/11/1997	TETRODOTOXIN	Germany	149231	NLR	15 CFR 764.2(a)
3	04/14/1997	TETRODOTOXIN CITRATE	Japan	149228	N/A	15 CFR 764.2(a)
4	04/14/1997	TETRODOTOXIN CITRATE	Hong Kong	149310	N/A	15 CFR 764.2(a)
5	04/15/1997	TETRODOTOXIN	Germany	149425	N/A	15 CFR 764.2(a)
6	04/21/1997	TETRODOTOXIN CITRATE	New Zealand	149755	N/A	15 CFR 764.2(a)
7	04/22/1997	TETRODOTOXIN CITRATE	Germany	149859	N/A	15 CFR 764.2(a)
8	04/23/1997	TETRODOTOXIN CITRATE	France	149947	N/A	15 CFR 764.2(i)
9	04/24/1997	TETRODOTOXIN	Germany	149680	NLR	15 CFR 764.2(a)
10	04/25/1997	OMEGA-CONOTOXIN MVIIC TETRODOTOXIN	Germany	150135	N/A	15 CFR 764.2(a)
11	04/28/1997	TETRODOTOXIN	Taiwan	150201	NLR	15 CFR 764.2(a)
12	04/28/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Korea	150202	N/A	15 CFR 764.2(g)
13	04/28/1997	TETRODOTOXIN CITRATE	France	150204	N/A	15 CFR 764.2(i)
14	04/29/1997	TETRODOTOXIN CITRATE	Spain	150313	N/A	15 CFR 764.2(a)
15	04/29/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Sweden	150343	N/A	15 CFR 764.2(i)
16	04/29/1997	TETRODOTOXIN	Germany	150316	N/A	15 CFR 764.2(a)
17	05/01/1997	TETRODOTOXIN	France	150499	N/A	15 CFR 764.2(i)
18	05/01/1997	TETRODOTOXIN	Germany	150500	N/A	15 CFR 764.2(a)
19	05/02/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Japan	150586	N/A	15 CFR 764.2(a)
20	05/05/1997	TETRODOTOXIN	Sweden	150727	N/A	15 CFR 764.2(i)

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21	05/06/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Spain	150756	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
22	05/08/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Taiwan	150905	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
23	05/08/1997	TETRODOTOXIN	France	150906	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
24	05/12/1997	TETRODOTOXIN	Italy	142205	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
25	05/13/1997	TETRODOTOXIN CITRATE	Germany	151162	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
26	05/16/1997	OMEGA-CONOTOXIN MVIIC TETRODOTOXIN CITRATE	Germany	151418	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)
27	05/19/1997	TETRODOTOXIN CITRATE	Japan	151413	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
28	05/19/1997	TETRODOTOXIN CITRATE	Uruguay	151405	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
29	05/20/1997	TETRODOTOXIN	Taiwan	151589	G-DEST	15 CFR 764.2(a) 15 CFR 764.2(g)
30	05/21/1997	TETRODOTOXIN CITRATE	Hong Kong	151677	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
31	05/22/1997	TETRODOTOXIN	United Kingdom	151772	G-DEST	15 CFR 764.2(a) 15 CFR 764.2(g)
32	05/27/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	151938	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
33	05/28/1997	TETRODOTOXIN CITRATE	France	152065	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
34	05/29/1997	OMEGA-CONOTOXIN MVIIC	Germany	152146	G-DEST	15 CFR 764.2(a) 15 CFR 764.2(g)
35	06/01/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Israel	152257	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
36	06/01/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Spain	152260	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
37	06/01/1997	OMEGA-CONOTOXIN GVIA TFA SALT TETRODOTOXIN CITRATE	Japan	152258	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
38	06/01/1997	TETRODOTOXIN CITRATE	United Kingdom	152261	N/A	15 CFR 764.2(a) 15 CFR 764.2(i)
39	06/02/1997	TETRODOTOXIN CITRATE	Switzerland	152371	N/A	15 CFR 764.2(a)
40	06/03/1997	TETRODOTOXIN	Germany	152458	N/A	15 CFR 764.2(a)

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41	06/04/1997	TETRODOTOXIN CITRATE	United Kingdom	152364	N/A	15 CFR 764.2(a)
42	06/05/1997	OMEGA-CONOTOXIN GVIA TFA SALT	France	152662	N/A	15 CFR 764.2(a)
43	06/06/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	152781	NLR	15 CFR 764.2(a)
44	06/06/1997	TETRODOTOXIN CITRATE	Poland	152760	N/A	15 CFR 764.2(g)
45	06/09/1997	MICROCYSTIN-LR	Japan	152754	N/A	15 CFR 764.2(a)
46	06/09/1997	OMEGA-CONOTOXIN GVIA TFA SALT	France	152872	N/A	15 CFR 764.2(a)
47	06/09/1997	MICROCYSTIN-LR	United Kingdom	152878	NLR	15 CFR 764.2(a)
48	06/10/1997	TETRODOTOXIN CITRATE	France	152974	N/A	15 CFR 764.2(g)
49	06/10/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	152977	Blank	15 CFR 764.2(a)
50	06/13/1997	OMEGA CONOTOXIN MVIIC	Germany	152977	Blank	15 CFR 764.2(g)
		TETRODOTOXIN	Spain	153260	N/A	15 CFR 764.2(a)
51	06/16/1997	OMEGA-CONOTOXIN GVIA TFA SALT	India	153372	N/A	15 CFR 764.2(a)
		OMEGA CONOTOXIN MVIIC	India	153372	N/A	15 CFR 764.2(i)
52	06/16/1997	SAXITOXIN	India	153372	N/A	15 CFR 764.2(a)
		TETRODOTOXIN	India	153372	N/A	15 CFR 764.2(a)
53	06/17/1997	TETRODOTOXIN	Germany	153364	NLR	15 CFR 764.2(a)
54	06/18/1997	TETRODOTOXIN	Netherlands	153583	N/A	15 CFR 764.2(g)
55	06/19/1997	MICROCYSTIN-LR	Denmark	153647	N/A	15 CFR 764.2(a)
56	06/23/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Netherlands	153830	N/A	15 CFR 764.2(a)
57	06/24/1997	TETRODOTOXIN	Germany	153927	N/A	15 CFR 764.2(a)
58	06/26/1997	MICROCYSTIN-LR	Australia	154118	N/A	15 CFR 764.2(a)
59	06/27/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	154212	N/A	15 CFR 764.2(a)
		TETRODOTOXIN	Germany	154212	N/A	15 CFR 764.2(a)
60	07/03/1997	OMEGA-CONOTOXIN MVIIC	United Kingdom	154550	NLR	15 CFR 764.2(a)
		SAXITOXIN	United Kingdom	154550	NLR	15 CFR 764.2(a)
		TETRODOTOXIN	United Kingdom	154550	NLR	15 CFR 764.2(a)
61	07/03/1997	TETRODOTOXIN CITRATE	United Kingdom	154545	N/A	15 CFR 764.2(a)
62	07/07/1997	TETRODOTOXIN CITRATE	France	154599	N/A	15 CFR 764.2(a)
63	07/07/1997	TETRODOTOXIN CITRATE	Germany	154597	N/A	15 CFR 764.2(a)
64	07/07/1997	TETRODOTOXIN CITRATE	Taiwan	154603	N/A	15 CFR 764.2(a)
65	07/08/1997	OMEGA-CONOTOXIN MVIIC	France	154708	N/A	15 CFR 764.2(a)
66	07/08/1997	TETRODOTOXIN CITRATE	United Kingdom	154715	N/A	15 CFR 764.2(a)

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67	07/09/1997	TETRODOTOXIN CITRATE	Japan	154702	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)
68	07/10/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Denmark	154902	N/A	15 CFR 764.2(a)
69	07/10/1997	TETRODOTOXIN	Turkey	154892	N/A	15 CFR 764.2(a)
70	07/11/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Switzerland	154989	N/A	15 CFR 764.2(a)
71	07/11/1997	OMEGA-CONOTOXIN MVIIC	Spain	154987	N/A	15 CFR 764.2(a)
72	07/15/1997	OMEGA-CONOTOXIN MVIIC TETRODOTOXIN CITRATE	Germany	155169	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)
73	07/22/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	155607	N/A	15 CFR 764.2(a)
74	07/28/1997	TETRODOTOXIN	Australia	155960	N/A	15 CFR 764.2(a)
75	08/06/1997	OMEGA-CONOTOXIN MVIIC MICROCYSSTIN-LR	Japan	156320	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)
76	08/06/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	France	156584	N/A	15 CFR 764.2(a)
77	08/07/1997	TETRODOTOXIN CITRATE	United Kingdom	156664	N/A	15 CFR 764.2(a)
78	08/08/1997	OMEGA-CONOTOXIN MVIIC	Germany	156733	N/A	15 CFR 764.2(a)
79	08/08/1997	TETRODOTOXIN CITRATE	France	156738	N/A	15 CFR 764.2(a)
80	08/08/1997	TETRODOTOXIN	Taiwan	156732	N/A	15 CFR 764.2(a)
81	08/11/1997	MICROCYSSTIN-LR	Denmark	156797	N/A	15 CFR 764.2(a)
82	08/13/1997	TETRODOTOXIN CITRATE MICROCYSSTIN-LR	Japan	156892	N/A	15 CFR 764.2(a)
83	08/14/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	United Kingdom	157026	N/A	15 CFR 764.2(a)
84	08/19/1997	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	157280	N/A	15 CFR 764.2(a)
85	08/20/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Germany	157320	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)
86	08/21/1997	OMEGA-CONOTOXIN MVIIC	United Kingdom	157404	N/A	15 CFR 764.2(a)
87	08/22/1997	OMEGA-CONOTOXIN MVIIC	Japan	157109	N/A	15 CFR 764.2(a)
88	08/22/1997	TETRODOTOXIN CITRATE	France	157496	N/A	15 CFR 764.2(a)
89	08/22/1997	TETRODOTOXIN CITRATE	Germany	157574	N/A	15 CFR 764.2(a)
90	08/25/1997	MICROCYSSTIN-LR	Denmark	157667	N/A	15 CFR 764.2(a)
91	09/04/1997	TETRODOTOXIN CITRATE	Japan	158038	N/A	15 CFR 764.2(a)
92	09/08/1997	OMEGA-CONOTOXIN MVIIC	Japan	158385	N/A	15 CFR 764.2(a)

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93	09/09/1997	TETRODOTOXIN CITRATE TETRODOTOXIN OMEGA CONOTOXIN GVIA TFA SALT MICROCYSSTIN-LR	Germany	158540	N/A	15 CFR 764.2(a)
94	09/12/1997	TETRODOTOXIN	Germany	158846	NLR	15 CFR 764.2(a)
95	09/15/1997	MICROCYSSTIN-LR	Japan	158852	N/A	15 CFR 764.2(g)
96	09/16/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	159023	NLR	15 CFR 764.2(a)
97	09/18/1997	TETRODOTOXIN	Brazil	159189	N/A	15 CFR 764.2(g)
98	09/19/1997	OMEGA-CONOTOXIN MVIIC	Germany	159274	NLR	15 CFR 764.2(a)
99	09/22/1997	SAXITOXIN TETRODOTOXIN	Switzerland	159347	N/A	15 CFR 764.2(a)
100	09/23/1997	TETRODOTOXIN	Hungary	159431	N/A	15 CFR 764.2(a)
101	09/25/1997	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIIC	Netherlands	159613	N/A	15 CFR 764.2(a)
102	09/26/1997	TETRODOTOXIN CITRATE	Germany	159701	N/A	15 CFR 764.2(a)
103	09/30/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	159905	NLR	15 CFR 764.2(a)
104	10/01/1997	TETRODOTOXIN	Argentina	160008	N/A	15 CFR 764.2(g)
105	10/03/1997	TETRODOTOXIN CITRATE	Germany	160172	NLR	15 CFR 764.2(a)
106	10/03/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Spain	160173	N/A	15 CFR 764.2(a)
107	10/06/1997	OMEGA-CONOTOXIN MVIIC	Japan	160182	N/A	15 CFR 764.2(a)
108	10/06/1997	OMEGA-CONOTOXIN GVIA TFA SALT MICROCYSSTIN-LR	Germany	160253	N/A	15 CFR 764.2(a)
109	10/06/1997	MICROCYSSTIN-LR	Denmark	160256	N/A	15 CFR 764.2(a)
110	10/10/1997	TETRODOTOXIN CITRATE	Germany	160577	NLR	15 CFR 764.2(a)
111	10/10/1997	TETRODOTOXIN CITRATE	Taiwan	160571	N/A	15 CFR 764.2(g)
112	10/10/1997	OMEGA-CONOTOXIN GVIA TFA SALT	United Kingdom	160583	N/A	15 CFR 764.2(a)
113	10/13/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Denmark	160645	N/A	15 CFR 764.2(a)
114	10/14/1997	SAXITOXIN	Germany	160728	N/A	15 CFR 764.2(a)
115	10/20/1997	TETRODOTOXIN CITRATE	Switzerland	160996	N/A	15 CFR 764.2(a)

ATTACHMENT B

SIGMA ALDRICH RESEARCH BIOCHEMICALS, INC.
 VIOLATIONS COMMITTED BY SIGMA ALDRICH RESEARCH BIOCHEMICALS, INC.

116	10/23/1997	TETRODOTOXIN CITRATE	France	161292	N/A	15 CFR 764.2(a)
117	10/24/1997	OMEGA-CONOTOXIN MVIIC	Spain	161373	N/A	15 CFR 764.2(a)
118	10/24/1997	OMEGA-CONOTOXIN MVIIC MICROCYSSTIN-LR	Japan	161392	N/A	15 CFR 764.2(a)
119	10/28/1997	TETRODOTOXIN CITRATE	Germany	161560	N/A	15 CFR 764.2(a)
120	10/28/1997	TETRODOTOXIN CITRATE	Switzerland	161556	N/A	15 CFR 764.2(a)
121	10/29/1997	OMEGA-CONOTOXIN MVIIC MICROCYSSTIN-LR	Japan	161392	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)
122	10/31/1997	TETRODOTOXIN CITRATE	Taiwan	161797	N/A	15 CFR 764.2(a)
123	10/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Spain	161794	N/A	15 CFR 764.2(a)
124	10/31/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	161806	N/A	15 CFR 764.2(a)
125	10/31/1997	MICROCYSSTIN-LR	Japan	161792	N/A	15 CFR 764.2(a)
126	10/31/1997	TETRODOTOXIN	United Kingdom	161803	N/A	15 CFR 764.2(a)
127	11/04/1997	TETRODOTOXIN CITRATE	Germany	161912	N/A	15 CFR 764.2(a)
128	11/05/1997	MICROCYSSTIN-LR	Japan	161780	NLR	15 CFR 764.2(a) 15 CFR 764.2(g)
129	11/12/1997	OMEGA-CONOTOXIN MVIIC	Japan	162178	NLR	15 CFR 764.2(a)
130	11/14/1997	TETRODOTOXIN CITRATE	France	162590	N/A	15 CFR 764.2(a)
131	11/14/1997	TETRODOTOXIN CITRATE	Japan	162601	N/A	15 CFR 764.2(a)
132	11/14/1997	TETRODOTOXIN CITRATE	United Kingdom	162586	N/A	15 CFR 764.2(a)
133	11/14/1997	OMEGA-CONOTOXIN MVIIC	Taiwan	162588	N/A	15 CFR 764.2(a)
134	11/18/1997	TETRODOTOXIN CITRATE	Germany	162766	NLR	15 CFR 764.2(a)
135	11/20/1997	TETRODOTOXIN CITRATE	France	162942	N/A	15 CFR 764.2(g)
136	11/21/1997	TETRODOTOXIN CITRATE	Germany	163029	N/A	15 CFR 764.2(a)
137	11/25/1997	OMEGA-CONOTOXIN GVIA TFA SALT	Germany	163206	NLR	15 CFR 764.2(a)
138	11/25/1997	OMEGA-CONOTOXIN GVIA TFA SALT	France	163205	N/A	15 CFR 764.2(a)
139	11/26/1997	TETRODOTOXIN CITRATE	Japan	163286	N/A	15 CFR 764.2(a)
140	12/02/1997	TETRODOTOXIN CITRATE	France	163396	N/A	15 CFR 764.2(a)
141	12/03/1997	TETRODOTOXIN	France	163576	N/A	15 CFR 764.2(a)
142	12/04/1997	TETRODOTOXIN	Taiwan	163672	N/A	15 CFR 764.2(a)
143	12/05/1997	TETRODOTOXIN CITRATE	Japan	163764	N/A	15 CFR 764.2(a)
144	12/09/1997	TETRODOTOXIN CITRATE	Germany	163868	N/A	15 CFR 764.2(a)

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145	12/11/1997	TETRODOTOXIN	France	164097	N/A	15 CFR 764.2(a)
146	12/12/1997	TETRODOTOXIN CITRATE MICROCYSSTIN-LR	Japan	164189	N/A	15 CFR 764.2(a)
147	12/15/1997	TETRODOTOXIN CITRATE TETRODOTOXIN	France	164263	N/A	15 CFR 764.2(a)
148	12/15/1997	OMEGA-CONOTOXIN GVIA TFA SALT	France	164262	N/A	15 CFR 764.2(a)
149	12/19/1997	TETRODOTOXIN	United Kingdom	164433	N/A	15 CFR 764.2(a)
150	12/20/1997	OMEGA-CONOTOXIN MVIIC	Germany	164427	NLR	15 CFR 764.2(a)
151	12/22/1997	TETRODOTOXIN	France	164525	N/A	15 CFR 764.2(a)
152	12/23/1997	MICROCYSSTIN-LR	Korea	164704	N/A	15 CFR 764.2(a)
153	12/24/1997	MICROCYSSTIN-LR TETRODOTOXIN	Japan	164521	NLR	15 CFR 764.2(a)
154	01/02/1998	TETRODOTOXIN CITRATE	Spain	164958	N/A	15 CFR 764.2(a)
155	01/05/1998	OMEGA-CONOTOXIN MVIIC TETRODOTOXIN MICROCYSSTIN-LR	Japan	164914	NLR	15 CFR 764.2(a)
156	01/06/1998	OMEGA-CONOTOXIN GVIA TFA SALT	Singapore	165084	N/A	15 CFR 764.2(a)
157	01/12/1998	TETRODOTOXIN CITRATE	Japan	165320	NLR	15 CFR 764.2(a)
158	01/23/1998	TETRODOTOXIN	India	166100	NLR	15 CFR 764.2(a)
159	01/23/1998	OMEGA-CONOTOXIN GVIA TFA SALT	Israel	166110	N/A	15 CFR 764.2(a)
160	01/27/1998	TETRODOTOXIN CITRATE	Japan	166113	NLR	15 CFR 764.2(a)
161	01/30/1998	TETRODOTOXIN CITRATE	Germany	166551	N/A	15 CFR 764.2(a)
162	02/04/1998	TETRODOTOXIN CITRATE	Japan	166569	NLR	15 CFR 764.2(a)
163	02/04/1998	TETRODOTOXIN CITRATE	Germany	166790	N/A	15 CFR 764.2(a)
164	02/09/1998	OMEGA-CONOTOXIN MVIIC	Japan	166916	NLR	15 CFR 764.2(a)
165	02/17/1998	OMEGA-CONOTOXIN MVIIC	Japan	167375	NLR	15 CFR 764.2(a)
166	02/20/1998	OMEGA-CONOTOXIN MVIIC	Taiwan	167743	N/A	15 CFR 764.2(a)
167	02/24/1998	OMEGA-CONOTOXIN MVIIC	Japan	167744	NLR	15 CFR 764.2(a)
168	02/26/1998	SAXITOXIN	France	168066	N/A	15 CFR 764.2(a)
169	02/27/1998	TETRODOTOXIN CITRATE	France	168133	N/A	15 CFR 764.2(a)
170	02/27/1998	MICROCYSSTIN-LR	Denmark	168149	N/A	15 CFR 764.2(a)
171	03/03/1998	TETRODOTOXIN	Japan	168147	NLR	15 CFR 764.2(a)
172	03/04/1998	TETRODOTOXIN CITRATE	France	168467	N/A	15 CFR 764.2(a)
173	03/06/1998	TETRODOTOXIN CITRATE	Taiwan	168604	N/A	15 CFR 764.2(a)
174	03/10/1998	TETRODOTOXIN CITRATE	Japan	168616	NLR	15 CFR 764.2(a)

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SIGMA ALDRICH RESEARCH BIOCHEMICALS, INC.
VIOLATIONS COMMITTED BY SIGMA ALDRICH RESEARCH BIOCHEMICALS, INC.

175	03/11/1998	OMEGA-CONOTOXIN GVIA TFA SALT	Mexico	168838	NLR	15 CFR 764.2(a)
176	03/13/1998	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MVIC	United Kingdom	168991	N/A	15 CFR 764.2(a)
177	03/17/1998	TETRODOTOXIN CITRATE	Sweden	169179	N/A	15 CFR 764.2(a)
178	03/20/1998	TETRODOTOXIN CITRATE	France	169432	N/A	15 CFR 764.2(a)
179	03/20/1998	MICROCYSTIN-LR	United Kingdom	169440	N/A	15 CFR 764.2(a)
180	03/23/1998	OMEGA-CONOTOXIN MVIC	Korea	169540	N/A	15 CFR 764.2(a)
181	03/25/1998	SAXITOXIN	France	169700	N/A	15 CFR 764.2(a)
182	03/27/1998	TETRODOTOXIN	United Kingdom	169891	N/A	15 CFR 764.2(a)
183	03/31/1998	OMEGA-CONOTOXIN GVIA TFA SALT	Australia	170117	N/A	15 CFR 764.2(a)
184	04/06/1998	MICROCYSTIN-LR	Japan	170369	NLR	15 CFR 764.2(a)
185	04/06/1998	OMEGA-CONOTOXIN GVIA TFA SALT	Korea	170465	N/A	15 CFR 764.2(a)
186	04/17/1998	OMEGA-CONOTOXIN MVIC	Japan	171122	N/A	15 CFR 764.2(a)
187	04/27/1998	OMEGA-CONOTOXIN GVIA TFA SALT OMEGA CONOTOXIN MI	Japan	171491	NLR	15 CFR 764.2(a)
188	04/27/1998	MICROCYSTIN-LR	Germany	171543	N/A	15 CFR 764.2(a)

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

In the Matters of:)	
)	
Sigma Aldrich Business)	01-BXA-06
Holdings, Inc.,)	
)	
and)	
)	
Sigma Aldrich Corporation,)	01-BXA-07
)	
and)	
)	
Sigma Aldrich Research)	01-BXA-11
Biochemicals, Inc.,)	
)	
Respondents.)	(The Honorable Peter A. Fitzpatrick)
)	

ORDER

The Bureau of Industry and Security, United States Department of Commerce (BIS), initiated administrative proceeding against Respondents, Sigma Aldrich Research Biochemicals, Inc. (SARBI), directly and as successor of Research Biochemicals Limited Partnership (RBLP), Sigma-Aldrich Corporation (SAC), and Sigma Aldrich Business Holdings, Inc. (SABH); (Respondents are collectively referred to as Sigma Aldrich) pursuant to Section 13(c) of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (1994 & Supp. V 1999)) (Act),¹ and the Export

¹ 50 U.S.C. app. 2401- 2420 (1994 & Supp. V 1999). From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential Notices, the last of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 - 1706 (1994 & Supp. V 1999)) (IEEPA). On November 13, 2000, the Act was reauthorized by Pub. L. No. 106-508 and it remained in effect through August 20, 2001. Since August 21, 2001, the Act has been in lapse and the President, through

Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2002)) (Regulations),² by issuing Charging Letters that alleged that Sigma Aldrich was liable for violations of the Regulations committed by RBLP and that SARBI was also liable for violations of the Regulations that it committed.

BIS and Sigma Aldrich have entered into a Settlement Agreement pursuant to Section 766.18(b) of the Regulations whereby they have agreed to settle these matters in accordance with the terms and conditions set forth in the Settlement Agreement. Specifically, the parties have agreed to settle the administrative cases for 318 charges, as follows:

- a. 80 exports of biological toxins made by RBLP without the required Department of Commerce export licenses in violation of either Section 787A.6 of the former Regulations or Section 764.2(a) of the Regulations,
- b. 188 exports of biological toxins made by SARBI without the required Department of Commerce export licenses in violation of Section 764.2(a) of the Regulations,

Executive Order 13222, which has been extended by a Presidential Notice of August 14, 2002 (67 *Fed. Reg.* 159 (August 16, 2002)), has continued the Regulations in effect under IEEPA. The Act and Regulations are available on the Government Printing Office website at: <http://w3.access.gpo.gov/bis/>.

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2002). The alleged violations occurred from 1996 through 1998. The Regulations governing the alleged violations at issue are found in the 1996 through 1998 versions of the Code of Federal Regulations (15 C.F.R. 15 C.F.R. Parts 768-799 (1996), as amended (61 *Fed. Reg.* 12714, March 25, 1996)) (former Regulations), and 15 C.F.R. Parts 730-774 (1997-1998)). The March 25, 1996 *Federal Register* publication redesignated, but did not republish, the then-existing Regulations as 15 C.F.R. Parts 768A-799A. In addition, the March 25, 1996 *Federal Register* publication restructured and reorganized the Regulations, designating them as an interim rule at 15 C.F.R. Parts 730-774, effective April 24, 1996. The former Regulations define the various violations that BIS alleges occurred through December 31, 1996. The Regulations define the various violations that BIS alleges occurred on or after January 1, 1997 and establish the procedures that apply to this matter.

- c. 25 material misrepresentations on Shipper's Export Declarations concerning the authority to export in violation of Section 764.2(g) of the Regulations, and
- d. 25 failures to maintain the records required under the Regulations in violation of Section 764.2(i) of the Regulations.

I have reviewed and approved the terms of the Settlement Agreement.

IT IS THEREFORE ORDERED:

FIRST, that SARBI shall pay a civil penalty of \$1,760,000 to the U.S. Department of Commerce within thirty days from the date of entry of this Order. Payment shall be made in the manner specified in the attached instructions. Payment of this civil penalty is guaranteed by SAC and SABH, SARBI's parent corporations. This penalty is in complete settlement of the cases pending against Sigma Aldrich, case numbers 01-BXA-06, 01-BXA-07, and 01-BXA-11.

SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§3701-3720E (1983 and Supp. 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, SARBI 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 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 Sigma Aldrich. Accordingly, if Sigma Aldrich should fail to pay the civil penalty in a timely manner, the undersigned may enter an Order denying all of Sigma Aldrich's

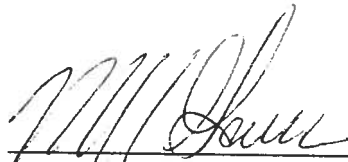
Order
Sigma Aldrich.
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export privileges for a period of one year from the date of entry of this Order.

FOURTH, that the Settlement Agreement, this Order, and the record of proceedings as described in Section 766.20 of the Regulations shall be made available to the public.

FIFTH, that a copy of this Order shall be delivered to the United States Coast Guard ALJ Docketing Center, 40 Gay Street, Baltimore, Maryland 21202-4022, notifying that office that the cases pending against Sigma Aldrich, case numbers 01-BXA-06, 01-BXA-07, and 01-BXA-11, are withdrawn from adjudication, as provided by Section 766.18(b) of the Regulations.

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



Michael J. Garcia
Assistant Secretary of Commerce
for Export Enforcement

Entered this 4th day of November 2002.