



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

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Kaiser Aluminum & Chemical Corporation
5847 San Felipe
Houston, TX 77057

Attention: *Chris Laszcz-Davis*
Vice President
Environmental Affairs, Health, Safety & Operational Integrity

Dear Ms. Laszcz-Davis:

The Bureau of Export Administration, United States Department of Commerce ("BXA"), has reason to believe that Kaiser Aluminum & Chemical Corporation ("Kaiser") violated the Export Administration Regulations (the "Regulations"),¹ which are issued under the authority of the Export Administration Act of 1979 (the "Act"),² on 31 occasions. Specifically, BXA charges that Kaiser committed the following violations:

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2001). The violations charged occurred from 1996 through 1999. The Regulations governing the violations at issue are found in the 1996 through 1999 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.* 16714, March 25, 1996) (the "former Regulations"), and 15 C.F.R. Parts 730-774 (1997-1999)). 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 in 1996, and 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 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 Executive Order 13222 of August 17, 2001 (66 *Fed. Reg.* 44025 (August 22, 2001)), 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/bxa/>.



Charges 1 - 12 (15 C.F.R. §787.6, §787A.6 and §764.2(a) - Engaging in Prohibited Conduct - Exports of Potassium Fluoride Without the Required Licenses)

As described in greater detail in Attachment A, which is enclosed and incorporated herein by reference, on 12 separate occasions, from on or about February 16, 1996 through on or about October 8, 1998, Kaiser exported or caused to be exported potassium fluoride, an item subject to the former Regulations and Regulations, from the United States to Jamaica without licenses from the Department of Commerce as required by Section 778.8 of the former Regulations and Section 742.2 of the Regulations. In doing so, Kaiser committed two violations of Section 787.6 and three violations of Section 787A.6 of the former Regulations, and seven violations of Section 764.2(a) of the Regulations, for a total of 12 violations.

Charges 13 - 22 (15 C.F.R. §787A.6 and §764.2(a) - Engaging in Prohibited Conduct - Exports of Aluminum Without the Required Licenses)

As described in greater detail in Attachment B, which is enclosed and incorporated herein by reference, on 10 separate occasions, from on or about July 30, 1996 through on or about March 10, 1999, Kaiser exported or caused to be exported aluminum rod with an outside diameter of more than three inches, an item subject to the former Regulations and Regulations, from the United States to Israel and Taiwan without licenses from the Department of Commerce as required by Section 778.2 of the former Regulations and Section 742.3 of the Regulations. In doing so, Kaiser committed five violations of Section 787A.6 of the former Regulations and five violations of Section 764.2(a) of the Regulations, for a total of 10 violations.

Charges 23 - 31 (15 C.F.R. §787.5, §787A.5 and §764.2(g) - False or Misleading Representations of Material Fact - Material Misrepresentations on Shipper's Export Declarations Concerning Authority to Export)

As described in greater detail in Attachment A, which is enclosed and incorporated herein by reference, on nine separate occasions from on or about March 17, 1996 through on or about October 8, 1998, Kaiser filed or caused to be filed Shipper's Export Declarations³ that stated that the potassium fluoride qualified for export from the United States to Jamaica under general license G-DEST of the former Regulations or NLR of the Regulations. These representations were false. Potassium fluoride required Department of Commerce licenses for export from the United States to Jamaica. In doing so, Kaiser committed one violation of Section 787.5 and one violation of Section 787A.5 of the former Regulations, and seven violations of Section 764.2(g) of the Regulations, for a total of nine violations.

³ Shipper's Export Declarations are export control documents, as defined in Section 770.2 of the former Regulations and Part 772 of the Regulations.-:

Accordingly, Kaiser 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 of \$11,000 per violation;⁴

Denial of export privileges; and/or

Exclusion from practice before BXA.

If Kaiser fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter, that failure will be treated as a default. (Regulations, Sections 766.6 and 766.7). If Kaiser defaults, the Administrative Law Judge may find the charges alleged in this letter are true without hearing or further notice to Kaiser. The Under Secretary of Commerce for Export Administration may then impose up to the maximum penalty on each of the charges in this letter.

Kaiser is further notified that it is entitled to an agency hearing on the record if Kaiser files a written demand for one with its answer. (Regulations, Section 766.6). Kaiser is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent it. (Regulations, Sections 766.3(a) and 766.4).

The Regulations provide for settlement without a hearing. (Regulations, Section 766.18). Should you have a proposal to settle this case, you or your representative should transmit it to me through the attorney representing BXA named below.

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

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

⁴Pursuant to the Federal Civil Penalties Adjustment Act of 1990 (28 U.S.C. §2461, note (1994 & Supp. V 1999)), and 15 C.F.R. §6.4(a)(2), the maximum penalty for each violation committed after October 23, 1996 and before November 1, 2000 is \$11,000.

Kaiser Aluminum & Chemical Corp.
Charging Letter
Page 4

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

Chief Counsel for Export Administration
Attention: Melissa B. Mannino
Room H-3839
United States Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Melissa B. Mannino is the attorney representing BXA in this case; any communications that you may wish to have concerning this matter should occur through her. She may be contacted by telephone at (202) 482-5304.

Sincerely,

Mark D. Menefee
Director
Office of Export Enforcement

Enclosure

Attachment A

Schedule of Violations - Kaiser Aluminum and Chemical Corporation

Part 1: Exports of Potassium Fluoride

No.	Export Date	Commodity	Quantity	ECCN	Destination	Violation(s)
1	16-Feb-96	Potassium Fluoride	4 Buckets	1C60	Jamaica	15 CFR 787.6
2	17-Mar-96	Potassium Fluoride	21 Buckets	1C60	Jamaica	15 CFR 787.5 15 CFR 787.6
3	20-May-96	Potassium Fluoride	8 Buckets	1C60	Jamaica	15 CFR 787A.6
4	21-Jun-96	Potassium Fluoride	42 Buckets	1C60	Jamaica	15 CFR 787A.5 15 CFR 787A.6
5	26-Aug-96	Potassium Fluoride	20 Buckets	1C60	Jamaica	15 CFR 787A.6
6	05-Feb-97	Potassium Fluoride	21 Buckets	1C350	Jamaica	15 CFR 764.2(a) 15 CFR 764.2(g)
7	06-Jun-97	Potassium Fluoride	20 Buckets	1C350	Jamaica	15 CFR 764.2(a) 15 CFR 764.2(g)
8	06-Jun-97	Potassium Fluoride	24 Buckets	1C350	Jamaica	15 CFR 764.2(a)
9	07-Oct-97	Potassium Fluoride	19 Buckets	1C350	Jamaica	15 CFR 764.2(a) 15 CFR 764.2(g)
10	03-Jan-98	Potassium Fluoride	23 Buckets	1C350	Jamaica	15 CFR 764.2(a) 15 CFR 764.2(g)
11	09-Jun-98	Potassium Fluoride	52 Buckets	1C350	Jamaica	15 CFR 764.2(a) 15 CFR 764.2(g)x2
12	08-Oct-98	Potassium Fluoride	21 Buckets	1C350	Jamaica	15 CFR 764.2(a) 15 CFR 764.2(g)

Attachment B

Schedule of Violations - Kaiser Aluminum and Chemical Corporation

Part 2: Exports of Aluminum

No.	Export Date	Commodity	Diameter in Inches	Quantity in Pounds	ECCN	Destination	Violation(s)
1	30-Jul-96	Aluminum Rod	6.5, 7	4,210	1C46	Israel	15 CFR 787A.6
2	08-Aug-96	Aluminum Rod	6	1,656	1C46	Israel	15 CFR 787A.6
3	17-Aug-96	Aluminum Rod	5	2,005	1C46	Israel	15 CFR 787A.6
4	30-Aug-96	Aluminum Rod	6, 6.5	860	1C46	Israel	15 CFR 787A.6
5	13-Sep-96	Aluminum Rod	5	835	1C46	Israel	15 CFR 787A.6
6	27-Feb-97	Aluminum Rod	5	835	1C202	Israel	15 CFR 764.2(a)
7	15-Jul-97	Aluminum Rod	6.5	1,926	1C202	Israel	15 CFR 764.2(a)
8	26-Aug-98	Aluminum Rod	15.625	40,530	1C202	Taiwan	15 CFR 764.2(a)
9	02-Jan-99	Aluminum Rod	4	1,468	1C202	Israel	15 CFR 764.2(a)
10	10-Mar-99	Aluminum Rod	15.625	40,350	1C202	Taiwan	15 CFR 764.2(a)

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF EXPORT ADMINISTRATION
WASHINGTON, D.C. 20230

In the Matter of:)
)
Kaiser Aluminum & Chemical Corporation)
5847 San Felipe)
Houston, TX 77057,)
)
Respondent)

SETTLEMENT AGREEMENT

This Settlement Agreement (Agreement) is made by and between Kaiser Aluminum & Chemical Corporation (Kaiser) and the Bureau of Export Administration, United States Department of Commerce (BXA), pursuant to Section 766.18(a) of the Export Administration Regulations (15 C.F.R. Parts 730-774 (2001)) (the Regulations),¹ issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2430 (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)).

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2001). The violations charged occurred from 1996 through 1999. The Regulations governing the violations at issue are found in the 1996 through 1999 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)) (the former Regulations), and 15 C.F.R. Parts 730-774 (1997-1999)). 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 in 1996, and 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 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 issued on 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 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 of August 17, 2001 (66 *Fed. Reg.* 44025 (August 22, 2001)), has continued the Regulations in effect under IEEPA.

WHEREAS, BXA has notified Kaiser of its intention to initiate an administrative proceeding against Kaiser pursuant to the Act and the Regulations;

WHEREAS, 3XA has issued a proposed charging letter to Kaiser that alleged that Kaiser committed 12 violations of the former Regulations and 19 violations of the Regulations. Specifically, the charges are:

1. *12 Violations of 15 C.F.R. §787.6 and §787A.6 of the former Regulations and §764.2(a) of the Regulations: Engaging in Prohibited Conduct - Exports of Potassium Fluoride Without the Required Licenses:* On 12 separate occasions, from on or about February 16, 1996 through on or about October 8, 1998, Kaiser exported or caused to be exported potassium fluoride, an item subject to the former Regulations and Regulations, from the United States to Jamaica without obtaining Department of Commerce licenses as required by Section 778.8 of the former regulations and Section 742.2 of the Regulations.

2. *10 Violations of 15 C.F.R. §787A.6 of the former Regulations and §764.2(a) of the Regulations: Engaging in Prohibited Conduct - Exports of Aluminum Without the Required Licenses:* On 10 separate occasions, from on or about July 30, 1996 through on or about March 10, 1999, Kaiser exported or caused to be exported aluminum rod with an outside diameter of more than three inches, an item subject to the former Regulations and Regulations, from the United States to Israel and Taiwan without licenses from the Department of Commerce as required by Section 778.2 of the former Regulations and Section 742.3 of the Regulations.

3. *Nine Violations of 15 C.F.R. §787.5 and §787A.5 of the former Regulations and §764.2(g) of the Regulations: False or Misleading Representations of Material Fact - Material Misrepresentations on Shipper's Export Declarations:* On nine separate occasions, from on or about March 17, 1996 through on or about October 8, 1998, Kaiser filed or caused to be filed Shipper's Export Declarations³ that stated that the

³ Shipper's Export Declarations are export control documents, as defined in Section 770.2 of the former Regulations and Part 772 of the Regulations.

potassium fluoride qualified for export from the United States to Jamaica under general license G-DEST of the former Regulations or NLR of the Regulations. These representations were false. Potassium fluoride required Department of Commerce licenses for export from the United States to Jamaica.

WHEREAS, Kaiser has reviewed the proposed charging letter and is aware of the allegations made against it and the administrative sanctions which could be imposed against it if the allegations are found to be true:

WHEREAS, Kaiser fully understands the terms of this Agreement and the Order that will be issued to give effect to this Settlement Agreement (Order);

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

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

WHEREAS, Kaiser neither admits nor denies the allegations contained in the proposed charging letter;

WHEREAS, Kaiser wishes to settle and dispose of all matters alleged in the proposed charging letter by entering into this Agreement; and

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

NOW THEREFORE, Kaiser and BXA agree as follows:

1. BXA has jurisdiction over Kaiser, under the former Regulations and Regulations, in connection with the matters alleged in the proposed charging letter.

2. BXA and Kaiser agree that the following sanction shall be imposed against Kaiser in complete settlement of the alleged violations of the former Regulations and Regulations set forth in the proposed charging letter:

- a. Kaiser shall be assessed a civil penalty in the amount of \$210,000. \$165,000 of which shall be paid to the U.S. Department of Commerce within thirty days from the date of entry of the Order. Payment of the remaining \$45,000 shall be suspended for a period of one year from the date of entry of the Order and thereafter shall be waived, provided that during the period of suspension, Kaiser has committed no violation of the Act, or any regulation, order or license issued thereunder or under IEEPA; and provided further that Kaiser has made timely payment of the \$165,000.
- b. The timely payment of the civil penalty agreed to in paragraph 2a. 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 Kaiser. Failure to make timely payment of the civil penalty set forth above shall result in the denial of all of Kaiser's export privileges for a period of one year from the date of entry of the Order imposing the civil penalty.

3. Kaiser agrees that, subject to the approval of this Agreement pursuant to paragraph 8 hereof, it 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 proposed charging letter; (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.

4. BXA agrees that, upon entry of the Order, it will not initiate any administrative proceeding against Kaiser in connection with any violation of the Act, former Regulations, or the Regulations arising out the transactions identified in the proposed charging letter.

5. Kaiser understands that BXA will make the proposed charging letter, this Agreement, and the Order, when entered, available to the public.

6. BXA and Kaiser agree that this Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement pursuant to Section 766.18(a) of the Regulations, BXA and Kaiser agree that they may not use this Agreement in any administrative or judicial proceeding and that the parties shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding

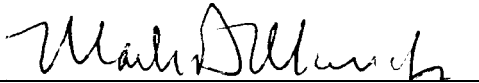
7. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, when entered, nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the United States Government with respect to the facts and circumstances addressed herein.

8. This Agreement shall become binding on BXA 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.

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

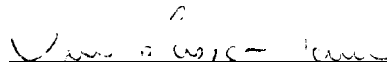
BUREAU OF EXPORT ADMINISTRATION
U.S. DEPARTMENT OF COMMERCE

KAISER ALUMINUM & CHEMICAL
CORPORATION



Mark D. Menefee
Director
Office of Export Enforcement

Date: 12/21/07



Chris Laszcz-Davis
Vice President
Environmental Affairs, Health, Safety
& Operational Integrity

Date: 12/18/07

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF EXPORT ADMINISTRATION
WASHINGTON, D.C. 20230

In the Matter of:)
)
Kaiser Aluminum & Chemical Corporation)
5847 San Felipe)
Houston, TX 77057,)
)
Respondent)

ORDER

The Bureau of Export Administration, United States Department of Commerce (BXA), having notified Kaiser Aluminum & Chemical Corporation (Kaiser), of its intention to initiate an administrative proceeding against it 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 Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2001)) (Regulations),* based on allegations in a proposed charging letter issued to Kaiser that alleged

¹ 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 issued on August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations then in effect under the International Emergency Economic Powers Act (50 U.S.C. 991701 - 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 of August 17, 2001 (66 *Fed. Reg.* 44025 (August 22, 2001)), has continued the Regulations in effect under IEEPA.

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that Kaiser committed 12 violations of the former Regulations and 19 violations of the Regulations. Specifically, the charges are:

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2. *10 Violations of 15 C.F.R. §787A.6 of the former Regulations and §764.2(a) of the Regulations: Engaging in Prohibited Conduct - Exports of Aluminum Without the Required Licenses:* On 10 separate occasions, from on or about July 30, 1996 through on or about March 10, 1999, Kaiser exported or caused to be exported aluminum rod with an outside diameter of more than three inches, an item subject to the former Regulations and Regulations, from the United States to Israel and Taiwan without licenses from the Department of Commerce as required by Section 778.2 of the former Regulations and Section 742.3 of the Regulations.

3. *Nine Violations of 15 C.F.R. §787.5 and §787A.5 of the former Regulations and §764.2(g) of the Regulations: False or Misleading Representations of Material Fact - Material*

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 in 1996, and 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. 4

Misrepresentations on Shipper's Export Declarations: On nine separate occasions, from on or about March 17, 1996 through on or about October 8, 1998, Kaiser filed or caused to be filed Shipper's Export Declarations³ that stated that potassium fluoride qualified for export from the United States to Jamaica under general license G-DEST of the former Regulations or NLR of the Regulations. These representations were false. Potassium fluoride required Department of Commerce licenses for export from the United States to Jamaica.

BXA and Kaiser having entered into a Settlement Agreement pursuant to Section 766.18(a) of the Regulations whereby they agreed to settle this matter in accordance with the terms and conditions set forth therein, and the terms of the Settlement Agreement having been approved by me;

IT IS THEREFORE ORDERED:

FIRST, that a civil penalty of \$210,000 is assessed against Kaiser, \$165,000 of which shall be paid 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 the remaining \$45,000 shall be suspended for one year from the date of entry of this Order and shall thereafter be waived, provided that, during the period of suspension, Kaiser has committed no violation of the Act, or any regulation, license or order issued thereunder or under IEEPA; and provided further that Kaiser has made timely payment of the \$165,000.

SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C.

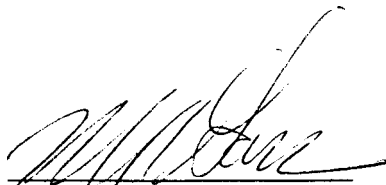
³ Shipper's Export Declarations are export control documents, as defined in Section 770.2 of the former Regulations and Part 772 of the Regulations.

§§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, Kaiser 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 Kaiser. Accordingly, if Kaiser should fail to pay the civil penalty in a timely manner, the undersigned will enter an Order denying all of Kaiser's export privileges for a period of one year from the date of entry of this Order.

FOURTH, that the proposed charging letter, the Settlement Agreement, and this Order shall be made available to the public.

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



Michael J. Garcia
Assistant Secretary of Commerce
for Export Enforcement

Entered this 28th day of December 2001