

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

In the Matter of:

The Indium Corporation of America
34 Robinson Road
Clinton, NY 13323

Respondent

**ORDER RELATING TO
INDIUM CORPORATION.**

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) has notified The Indium Corporation of America of Clinton, New York (“Indium”) of its intention to initiate an administrative proceeding against Indium pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),¹ through the issuance of a Proposed Charging Letter to Indium that alleges that Indium committed 11 violations of the Regulations.² Specifically:

GENERAL ALLEGATIONS

As described further below, between on or about April 14, 2022, through on or about March 31, 2023, Indium violated the Regulations when it exported items subject to the EAR to Russia without the requisite license or other authorization from BIS. Specifically, Indium exported 11 shipments to Russia of solder preforms, solder wires, and solder ribbon, all of which are designated EAR99 but required a license for export to Russia under § 746.10(a)(1) of the Regulations.³

¹ The Regulations are issued under the authority of the Export Control Reform Act of 2018, Title XVII, Subtitle B of Pub. L. 115-232, 132 Stat. 2208 (“ECRA,” 50 U.S.C. §§ 4801-4852).

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2024). The charged violations occurred in 2023. The Regulations governing the violations at issue are found in the 2023 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2023)). The 2024 Regulations set forth the procedures that apply to this matter.

³ The EAR’s Harmonized Tariff Schedule-based license requirements for items destined to Russia have been continuously revised since first imposed in February 2022. The items in question here appear on Supplement no. 5 to Part 746 of the EAR. The license requirement for these items when destined to or within Russia now appears in § 746.8(a)(7) of the EAR.

Key Parties

A. Indium

Indium is a materials refiner, smelter, manufacturer, and supplier to the global electronics, semiconductor, thin-film, and thermal management markets. The company has over 1,400 employees and global technical support and factories located in China, Germany, India, Malaysia, Singapore, South Korea, the United Kingdom, and the United States. Indium develops, manufactures, and exports electronics assembly materials worldwide, including solder wire, solder ribbon, and solder preforms. Solder wire is a thin, flexible piece of metal which is used to make electrical connections between parts or nodes of a printed circuit board assembly. Solder ribbon is a very thin strip of solder that is used to connect electronic components together. Solder preforms are solid, flat, manufactured shapes of solder that can be used for a wide variety of assembly applications and come in a wide variety of alloys.

B. Transaction Parties

- 1) Inter-Trans Sp z.o.o. (“Inter-Trans”) is a freight forwarding company based in Poland. Inter-Trans negotiated and coordinated the export of Indium’s items to Russia and served as the intermediate consignee and purchaser of these items.
- 2) BMA Spedition GmbH (“BMA Spedition”) is a freight forwarding company based in Germany to whom Indium’s exports were addressed and was an intermediate consignee of Indium’s shipments. From Germany, Inter-Trans and/or BMA Spedition transported Indium’s shipments to Russia.
- 3) Ostec Integra Ltd. (“Ostec”) is a Russia-based defense contractor and electronics supplier who ordered the relevant items from Indium. At all relevant times, Ostec was the ultimate consignee of Indium’s exports. Ostec is one of 12 companies in the Ostec Group, a Russian technology consortium and military contractor.

On May 19, 2023, the U.S. Department of the Treasury Office of Foreign Assets Control (“OFAC”) designated Inter-Trans, BMA Spedition, and all 12 companies of the Ostec Group to the Specially Designated Nationals List.⁴ As OFAC noted, the Ostec Group imports and distributes quantum and semiconductor technologies and supports Russian producers of various missile systems and aerial bombs.⁵ Ostec Integra Ltd. specifically specializes in automation and electronics production, including the acquisition of

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microelectronics components. Furthermore, Inter-Trans and BMA Spedition coordinated shipments of electronic components to the Ostec Group and arranged for the transport of items between Western Europe, Russia, and Belarus. Inter-Trans and BMA Spedition have facilitated hundreds of shipments of western electronic components to Ostec Group since the beginning of Russia's invasion of Ukraine. The violations that are the subject of this letter occurred prior to OFAC's designation of these parties.

STATEMENT OF CHARGES

Charges 1-11 15 C.F.R. § 764.2(a) – Engaging in prohibited conduct

1. As described further below, between on or about April 14, 2022, through on or about March 31, 2023, Indium engaged in conduct prohibited by the Regulations on 11 occasions when it exported solder preforms, solder wires, and solder ribbon, valued at \$96,505.89, to Russia without the requisite license or other authorization from BIS.
2. The items exported by Indium are classified EAR99. However, because these items were classified by Harmonized Tariff Schedule (“HTS”) codes which appeared on Supplement no. 5 to Part 746 of the EAR at the time of export, these items required a license for export to Russia pursuant to § 746.10(a)(1) of the EAR.
3. Supplement no. 5 to Part 746 of the Regulations identifies ‘luxury goods’ which require a BIS license for export, reexport, or transfer (in-country) to Russia or Belarus. For the purposes of this license requirement, a ‘luxury good’ is any item identified in Supplement no. 5 to Part 746 of the Regulations. The HTS classifications of the items contained in each of Indium's 11 exports are detailed in the Schedule of Violations below.
4. According to information it voluntarily disclosed to BIS, Indium encountered but failed to appropriately address red flags throughout the transactions that are the subject of the charges in this letter. The Regulations define “red flags” as abnormal circumstances in a transaction that indicate that the export may be destined for an inappropriate end-use, end-user, or destination.⁶ Since Russia's full-scale invasion of Ukraine in February 2022, BIS has published several guidance documents, including those authored with interagency partners and allies, which detail common red flags that may arise in transactions and indicate potential violations of BIS's controls.⁷

⁶ See Supplement no. 3 to Part 732 of the EAR.

⁷ See, e.g., Department of Commerce, Department of the Treasury, and Department of Justice, *Tri-Seal Compliance Note: Cracking Down on Third-Party Intermediaries Used to Evade Russia-Related Sanctions and Export Controls* (March 2, 2023); FinCEN and U.S. Department of Commerce Bureau of Industry and Security, *FinCEN and the U.S. Department of Commerce's Bureau of Industry and Security Urge Increased Vigilance for Potential Russian and Belarusian Export Control Evasion Attempts* (June 28, 2022).

5. Indium was contacted on or about March 16, 2022, by the Head Specialist in Sales of Materials for Microelectronics from Ostec to request a quotation for solder ribbon. The sales specialist's address was listed as Moscow, Russia. According to Indium's data sheet, the properties of the requested solder ribbon allow it to be used in microwave systems and aerospace applications, among other end-uses. After this order was placed on or about April 14, 2022, a logistics specialist from Ostec attempted a last-minute change to route the shipment through Hong Kong. This individual explained to Indium personnel that shipments are easier to send to Russia from Hong Kong, rather than through Germany as originally planned. As later identified in BIS's Russia-specific red flag guidance, Hong Kong is a common location for the transshipment of items to Russia and Belarus, and last minute changes to transactions associated with an originator in Russia are a red flag.⁸
6. In all purchase orders for the exports detailed herein, Inter-Trans wrote "all products from this order are intended to be sold to Ostec Integra Ltd., Russian Federation." Nonetheless, all purchase orders established that Inter-Trans would serve as the purchaser, while Inter-Trans and BMA Spedition both served as intermediate consignees, with the orders to be shipped to Germany. Shipments planned for out of the way destinations and payments coming from third-country parties or businesses not on an end-user certificate are red flags.
7. On or about March 21, 2023, Inter-Trans requested that Indium delete certain personnel and Russian phone numbers from final shipping documentation to avoid "problems" with the shipment. Indium complied with these instructions. Last minute changes to shipping instructions that appear contrary to customer history or business practices are a red flag.
8. In total, from on or about April 14, 2022, through on or about March 31, 2023, Indium engaged in 11 transactions involving the sale of solder wires, solder ribbon, and solder preforms to Ostec Integra Ltd. Each of these transactions involved items classified by an HTS code listed in Supplement no. 5 to Part 746 of the EAR and required a license for export to Russia pursuant to § 746.10(a)(1) of the EAR.
9. By engaging in 11 exports to Russia without the requisite license or other authorization from BIS, Indium committed 11 violations of § 764.2(a) of the Regulations.⁹

⁸ *Id.*

⁹ Additionally, each time Indium exported items to Ostec, Indium submitted or caused to be submitted misleading Electronic Export Information ("EEI") through the Automated Export System, as Ostec was not declared as the ultimate consignee of these items, nor was Russia declared as the ultimate destination. False or misleading EEI filings frustrate BIS's ability to monitor the compliance of parties exporting items from the United States. Here, BIS has chosen not to separately charge these violations.

WHEREAS, BIS and Indium have entered into a Settlement Agreement pursuant to Section 766.18(a) of the Regulations, whereby they agreed to settle this matter in accordance with the terms and conditions set forth therein;

WHEREAS, Indium admits committing the alleged conduct described in the Proposed Charging Letter; and

WHEREAS, I have approved of the terms of such Settlement Agreement;

IT IS THEREFORE ORDERED:

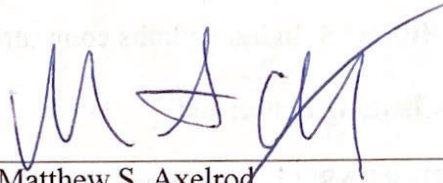
FIRST, Indium shall be assessed a civil penalty in the amount of \$180,000, the payment of which shall be made to the U.S. Department of Commerce within 30 days of this Order.

SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (2012)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and if payment is not made by the due dates specified herein, Indium will be assessed, in addition to the full amount of the civil penalty and interest, a penalty charge and an administrative charge, as more fully described in the attached Notice.

THIRD, that the full and timely payment of the civil penalty in accordance with the payment schedule set forth above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Indium. Accordingly, if Indium should fail to pay the civil penalty in a full and timely manner, the undersigned may issue an order denying all of Indium's export privileges under the Regulations for a period of one year from the date of failure to make such payment.

FOURTH, 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.



Matthew S. Axelrod
Assistant Secretary of Commerce
for Export Enforcement

Issued this 20th day of December, 2024.

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

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SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between The Indium Corporation of America of Clinton, New York (“Indium”), and the Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) (collectively, the “Parties”), pursuant to Section 766.18(a) of the Export Administration Regulations (the “Regulations”).¹

WHEREAS Indium cooperated with BIS’s Office of Export Enforcement in its investigation and has made investment in and improvement of its compliance program;

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

WHEREAS, BIS has issued a Proposed Charging Letter to Indium that alleges that Indium committed 11 violations of the Regulations, specifically:

GENERAL ALLEGATIONS

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⁸ *Id.*

9. By engaging in 11 exports to Russia without the requisite license or other authorization from BIS, Indium committed 11 violations of § 764.2(a) of the Regulations.⁹

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

WHEREAS, Indium has reviewed, with the assistance of counsel, the terms of this Agreement, the Order (“Order”) that the Assistant Secretary of Commerce for Export Enforcement will issue if he approves this Agreement as the final resolution of this matter, and the Proposed Charging Letter, and understands the terms of all three documents;

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

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

WHEREAS, Indium admits committing the alleged conduct described in the Proposed Charging Letter; and

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

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

⁹ Additionally, each time Indium exported items to Ostec, Indium submitted or caused to be submitted misleading Electronic Export Information (“EEI”) through the Automated Export System, as Ostec was not declared as the ultimate consignee of these items, nor was Russia declared as the ultimate destination. False or misleading EEI filings frustrate BIS’s ability to monitor the compliance of parties exporting items from the United States. Here, BIS has chosen not to separately charge these violations.

1. BIS has jurisdiction over Indium, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.
2. The following sanctions shall be imposed against Indium:
 - a. Indium shall be assessed a civil penalty in the amount of \$180,000, the payment of which shall be made to the U.S. Department of Commerce within 30 days of the date of the Order. Payment shall be made in the manner specified in the attached instructions.
 - b. The full and timely payment of the civil penalty agreed to in Paragraph 2.a above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Indium. Failure to make full and timely payment of the civil penalty may result in the denial of all of Indium's export privileges under the Regulations for one year from the date of the failure to make such payment.
3. Subject to the approval of this Agreement pursuant to Paragraph 7 hereof, Indium hereby waives all rights to further procedural steps in this matter (except the procedural steps set forth in Sections 766.17(c) and 766.18(c) of the Regulations with respect to the possible activation of suspended sanctions due to a violation of this Agreement or the Order, if issued), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if issued; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued. Indium also waives and will not assert any Statute of Limitations defense, and the Statute of Limitations will be tolled, in connection with any violation of ECRA or the

Regulations arising out of the transactions identified in the Proposed Charging Letter or in connection with collection of the civil penalty or enforcement of this Agreement and the Order, if issued, from the date of the Order, until Indium pays in full the civil penalty agreed to in Paragraph 2.a of this Agreement.

4. BIS agrees that upon successful compliance in full with the terms of this Agreement and the Order, if issued, BIS will not initiate any further administrative proceeding against Indium in connection with any violation of the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter, or those specifically detailed in Indium's Voluntary Self Disclosure.

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

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

7. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement approves it by issuing the Order, which

will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

8. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, available to the public.

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

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

JOHN
SONDERMAN

Digitally signed by
JOHN SONDERMAN
Date: 2024.12.20
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John Sonderman
Director of Export Enforcement

Date: 12/20/2024


THE INDIUM CORPORATION OF
AMERICA



Michael R. McKenna
Vice President & Chief Financial Officer

Date: 12-19-24

Reviewed and approved by:



Kristine Pirnia
Sandler, Travis & Rosenberg P.A.
Counsel for Indium Corporation

Date: 12/20/2024

PROPOSED CHARGING LETTER

December 19, 2024

The Indium Corporation of America
34 Robinson Road
Clinton, NY 13323

Attention: Kristine Pirnia Esq., Sandler Travis & Rosenberg, P.A.
Legal Counsel

Dear Ms. Pirnia,

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that The Indium Corporation of America (“Indium”) committed 11 violations of the Export Administration Regulations (the “Regulations” or “EAR”).¹ Specifically, BIS alleges and charges the following:

GENERAL ALLEGATIONS

As described further below, between on or about April 14, 2022, through on or about March 31, 2023, Indium violated the Regulations when it exported items subject to the EAR to Russia without the requisite license or other authorization from BIS. Specifically, Indium exported 11 shipments to Russia of solder preforms, solder wires, and solder ribbon, all of which are designated EAR99 but required a license for export to Russia under § 746.10(a)(1) of the Regulations.²

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1. As described in the attached Schedule of Violations, between on or about April 14, 2022, through on or about March 31, 2023, Indium engaged in conduct prohibited by the Regulations on 11 occasions when it exported solder preforms, solder wires, and solder ribbon, valued at \$96,505.89, to Russia without the requisite license or other authorization from BIS.
2. The items exported by Indium are classified EAR99. However, because these items were classified by Harmonized Tariff Schedule (“HTS”) codes which appeared on Supplement no. 5 to Part 746 of the EAR at the time of export, these items required a license for export to Russia pursuant to § 746.10(a)(1) of the EAR.
3. Supplement no. 5 to Part 746 of the Regulations identifies ‘luxury goods’ which require a BIS license for export, reexport, or transfer (in-country) to Russia or Belarus. For the purposes of this license requirement, a ‘luxury good’ is any item identified in Supplement no. 5 to Part 746 of the Regulations. The HTS classifications of the items contained in each of Indium’s 11 exports are detailed in the Schedule of Violations below.
4. According to information it voluntarily disclosed to BIS, Indium encountered but failed to appropriately address red flags throughout the transactions that are the subject of the charges in this letter. The Regulations define “red flags” as abnormal circumstances in a transaction that indicate that the export may be destined for an inappropriate end-use, end-user, or destination.⁵ Since Russia’s full-scale invasion of Ukraine in February 2022, BIS has published several guidance documents, including those authored with interagency partners and allies, which detail common red flags that may arise in transactions and indicate potential violations of BIS’s controls.⁶
5. Indium was contacted on or about March 16, 2022, by the Head Specialist in Sales of Materials for Microelectronics from Ostec to request a quotation for solder ribbon. The sales specialist’s address was listed as Moscow, Russia. According to Indium’s data sheet, the properties of the requested solder ribbon allow it to be used in microwave systems and aerospace applications, among other end-uses. After this order was placed on or about April 14, 2022, a logistics specialist from Ostec attempted a last-minute change to route the shipment through Hong Kong. This individual explained to Indium personnel that shipments are easier to send to Russia from Hong Kong, rather than through Germany as originally planned. As later identified in BIS’s Russia-specific red

⁵ See Supplement no. 3 to Part 732 of the EAR.

⁶ See, e.g., Department of Commerce, Department of the Treasury, and Department of Justice, *Tri-Seal Compliance Note: Cracking Down on Third-Party Intermediaries Used to Evade Russia-Related Sanctions and Export Controls* (March 2, 2023); FinCEN and U.S. Department of Commerce Bureau of Industry and Security, *FinCEN and the U.S. Department of Commerce’s Bureau of Industry and Security Urge Increased Vigilance for Potential Russian and Belarusian Export Control Evasion Attempts* (June 28, 2022).

flag guidance, Hong Kong is a common location for the transshipment of items to Russia and Belarus, and last minute changes to transactions associated with an originator in Russia are a red flag.⁷

6. In all purchase orders for the exports detailed herein, Inter-Trans wrote “all products from this order are intended to be sold to Ostec Integra Ltd., Russian Federation.” Nonetheless, all purchase orders established that Inter-Trans would serve as the purchaser, while Inter-Trans and BMA Spedition both served as intermediate consignees, with the orders to be shipped to Germany. Shipments planned for out of the way destinations and payments coming from third-country parties or businesses not on an end-user certificate are red flags.
7. On or about March 21, 2023, Inter-Trans requested that Indium delete certain personnel and Russian phone numbers from final shipping documentation to avoid “problems” with the shipment. Indium complied with these instructions. Last minute changes to shipping instructions that appear contrary to customer history or business practices are a red flag.
8. In total, from on or about April 14, 2022, through on or about March 31, 2023, Indium engaged in 11 transactions involving the sale of solder wires, solder ribbon, and solder preforms to Ostec Integra Ltd. Each of these transactions involved items classified by an HTS code listed in Supplement no. 5 to Part 746 of the EAR and required a license for export to Russia pursuant to § 746.10(a)(1) of the EAR.
9. By engaging in 11 exports to Russia without the requisite license or other authorization from BIS, Indium committed 11 violations of § 764.2(a) of the Regulations.⁸

* * * * *

Accordingly, Indium is hereby notified that an administrative proceeding is instituted against it pursuant to Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including, but not limited to any or all of the following:

⁷ *Id.*

⁸ Additionally, each time Indium exported items to Ostec, Indium submitted or caused to be submitted misleading Electronic Export Information (“EEI”) through the Automated Export System, as Ostec was not declared as the ultimate consignee of these items, nor was Russia declared as the ultimate destination. False or misleading EEI filings frustrate BIS’s ability to monitor the compliance of parties exporting items from the United States. Here, BIS has chosen not to separately charge these violations.

- The maximum civil penalty allowed by law of up to the greater of \$364,992 per violation,⁹ or twice the value of the transaction that is the basis of the violation;¹⁰
- Denial of export privileges;
- Exclusion from practice before BIS; and/or
- Any other liability, sanction, or penalty available under law.

If Indium fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter, that failure will be treated as a default. *See* 15 C.F.R. §§ 766.6 and 766.7. If Indium defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Indium. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty for the charges in this letter.

Indium is further notified that it is entitled to an agency hearing on the record if it files a written demand for one with their answer. *See* 15 C.F.R. § 766.6. Indium is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent them. *See* 15 C.F.R. §§ 766.3(a) and 766.4.

The Regulations provide for settlement without a hearing. *See* 15 C.F.R. § 766.18. Should Indium have a proposal to settle this case, Indium should transmit it to the attorneys representing BIS named below.

Indium is further notified that under the Small Business Regulatory Enforcement Flexibility Act, Indium may be eligible for assistance from the Office of the National Ombudsman of the Small Business Administration in this matter. To determine eligibility and get more information, please see: <http://www.sba.gov/ombudsman/>.

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

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

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

⁹ *See* 15 C.F.R. § 6.3(c)(6). This amount is subject to annual increases pursuant to the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, Sec. 701 of Public Law 114-74, enacted on November 2, 2015. *See* 88 Fed. Reg. 89,300 (Dec. 27, 2023) (adjusting for inflation the maximum civil monetary penalty under ECRA from \$353,534 to \$364,992, effective January 15, 2024).

¹⁰ *See* Export Control Reform Act of 2018, 50 U.S.C. § 4819(c)(1)(A) (2019).

Chief Counsel for Industry and Security
Attention: Michael Goldstein Esq. and Emily Burton Esq.
Room H-3839
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Michael Goldstein and Emily Burton are the attorneys representing BIS in this case; any communications that Indium may wish to have concerning this matter should occur through them. Mr. Goldstein may be contacted by phone at (202) 482-6424. Ms. Burton may be reached at (240) 981-2728.

Sincerely,

John D. Sonderman
Director
Office of Export Enforcement

<u>Schedule of Violations</u>					
Charge No.	Date	Item(s) Description	HTS/HS Code	Violation	Value
1	May 17, 2022 ¹¹	80% Gold 20% Tin Solder Ribbon	7108.13.5000	§ 764.2(a)	\$2,553.00
2	June 27, 2022	80% Gold 20% Tin Solder Ribbon	7108.13.5000	§ 764.2(a)	\$2,015.10
3	July 12, 2022	80% Gold 20% Tin Solder Ribbon	7108.13.5000	§ 764.2(a)	\$11,010.78
4	August 25, 2022	63% Tin 37% Lead Solder Wire	7106.92.0000	§ 764.2(a)	\$5,214.59
5	October 7, 2022	62% Tin 36% Lead 2% Silver	7106.92.0000	§ 764.2(a)	\$1,146.30

¹¹ Ordered April 14, 2022.

		Solder Preform			
6	October 31, 2022	62% Tin 36% Lead 2% Silver Solder Preform	7106.92.0000	§ 764.2(a)	\$1,097.55
7	December 15, 2022	62% Tin 36% Lead 2% Silver Solder Wire	7106.92.0000	§ 764.2(a)	\$6,114.40
8	December 20, 2022	62% Tin 36% Lead 2% Silver Solder Wire	7106.92.0000	§ 764.2(a)	\$10,213.20
9	December 20, 2022	80% Gold 20% Tin Solder Ribbon	7108.13.5000	§ 764.2(a)	\$47,367.27
10	January 9, 2023	63% Tin 37% Lead Solder Wire	7106.92.0000	§ 764.2(a)	\$3,698.25
11	March 15, 2023 ¹²	62% Tin 36% 2% Silver Lead Solder Wire	7106.92.0000	§ 764.2(a)	\$6,075.45
Total Value of Shipments:					\$96,505.89

¹² Exported March 31, 2023.