

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

In the Matter of:

Alpha and Omega Semiconductor Incorporated  
475 Oakmead Pkwy  
Sunnyvale, CA 94085

Respondent

ORDER RELATING TO  
ALPHA AND OMEGA SEMICONDUCTOR INCORPORATED

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Alpha and Omega Semiconductor Incorporated of Sunnyvale, California (“AOS” or the “Company”), of its intention to initiate an administrative proceeding against AOS pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),<sup>1</sup> through the issuance of a Proposed Charging Letter to AOS that alleges that AOS committed fifteen violations of the Regulations. Specifically:

**STATEMENT OF CHARGES**

1. AOS—located in Sunnyvale, California—designs, develops, and supplies power semiconductors for a range of applications, including personal and portable computers, graphics cards, flat panel TVs, home appliances, smart phones, battery packs, quick chargers, servers, and telecommunications equipment. As described in greater detail below and in the attached Schedule of Violations, between on or about May 28, 2019 and on or about November 22, 2019, AOS engaged in conduct prohibited by the Regulations on 15 occasions when it forwarded from the United States without authorization from BIS approximately 1,650 power controllers, smart power stages, and related accessories to Huawei Technology Co. Ltd. (“Huawei”), a company listed on the BIS Entity List.<sup>2</sup> On eleven of

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<sup>1</sup> The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2025). The charged violations occurred in 2019. The Regulations governing the violations at issue are found in the 2019 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2019)). The 2025 Regulations set forth the procedures that apply to this matter.

<sup>2</sup> See 84 Fed. Reg. 22961 (May 21, 2019).

- these fifteen occasions, AOS knew—or had reason to know, including the awareness of a high probability that an event may occur—that a violation of the Regulations had occurred, was occurring, or was about to occur.<sup>3</sup>
2. Huawei and certain of its non-U.S. affiliates were added to the Entity List on May 16, 2019. The Entity List designation was based on a determination made by multiple U.S. government agencies “that there is reasonable cause to believe that Huawei has been involved in activities contrary to the national security or foreign policy interests of the United States.”<sup>4</sup> Specifically, the End-User Review Committee, composed of representatives of the U.S. Departments of Commerce (Chair), State, Defense, and Energy, determined that the listings were necessary to protect U.S. national security or foreign policy. As a result of Huawei’s addition to the Entity List, licensing requirements were imposed on exports, reexports, and transfers (in-country) of all items subject to the EAR destined to or involving the listed Huawei entities.
  3. The items at issue in these charges were foreign-designed and foreign-produced, and when subject to the EAR, they were designated as EAR99.<sup>5</sup> The items in the transactions at issue were subject to the EAR because AOS exported them from the United States. At all times relevant to these charges, BIS authorization was required to export, reexport, or transfer (in-country) all items subject to the EAR to Huawei pursuant to Section 744.11 and Supplement No. 4 to Part 744 of the Regulations.

**Charges 1 - 4            15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Forwarding Items Subject to the EAR to a Company on the BIS Entity List Without Authorization**

4. The Digital Power business unit of AOS was established in 2018 and conducted its business activities primarily in Austin, Texas.<sup>6</sup> Since the inception of the Digital Power business unit, AOS had been in discussions with potential customers, including Huawei, to try to establish AOS’s Digital Power business unit as a supplier of digital power products. At all times relevant to these charges, AOS operated an affiliated entity in Chongqing, China.
5. As of May 2019, Huawei had not yet qualified AOS’s Digital Power business as a supplier to Huawei for digital power products. After Huawei’s inclusion to the

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<sup>3</sup> See 15 C.F.R. § 772.1 (“Knowledge”).

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<sup>6</sup> The Digital Power business unit was eliminated in 2021 as it never generated any significant revenue.

Entity List, AOS and other suppliers had initially halted shipments to Huawei while they analyzed whether they would require authorization from BIS to continue supplying products to Huawei.

6. To move forward with the supplier qualification process, AOS needed to provide Huawei with sample products so that Huawei could test the items to determine their suitability for Huawei's planned uses. Even before Huawei's addition to the Entity List, AOS relied on outside counsel for advice on how to comply with U.S. export control regulations when doing business with customers in China, including Huawei. As early as May 15, 2019, and continuing through November 2019, AOS regularly communicated with outside counsel about whether it could do business with Huawei due to Huawei's inclusion on the Entity List. The communications between AOS and outside counsel focused, at least in part, on whether AOS could supply foreign-produced products to Huawei if AOS manufactured, tested, and packaged the products in China. During these communications, AOS did not provide its outside counsel with details specific to the completed samples being exported from the United States in connection with Huawei's supplier qualification process.
7. On or around May 18, 2019, AOS's outside counsel provided guidance to AOS that BIS authorization would not be required for products assembled in China and which did not contain more than a *de minimis* amount of controlled U.S.-origin content, as such products would not be subject to the EAR. Outside counsel noted in its guidance that it had not been provided with facts specific to the products AOS intended to provide to Huawei and suggested that if AOS was unsure whether the products at issue were subject to the EAR, AOS should immediately halt supply of the items to Huawei pending further analysis of whether they were subject to the EAR. Despite ongoing discussions between AOS and outside counsel about other issues related to the relationship with Huawei throughout the summer of 2019, AOS did not seek guidance from outside counsel regarding the permissibility of exporting the sample products from the United States to Huawei for testing and evaluation purposes.
8. On or around May 28, 2019, AOS senior executives traveled to China to meet with Huawei to discuss AOS's status as a possible supplier to Huawei. Later that same day, an AOS employee based in Taiwan sent an email to AOS employees in the United States referencing the AOS executives' meeting with Huawei and informing the AOS employees in the U.S. that AOS "can provide products to Huawei even digital power." The email from the AOS employee in Taiwan requested that AOS employees in the United States export 200 smart power stage samples to an AOS engineer in Shenzhen for evaluation by Huawei. AOS employees in the United States exported the requested items the same day.

9. Between May 28, 2019 and June 7, 2019, on four occasions AOS employees in the United States exported to an AOS facility in China approximately 600 sample smart power stages power controllers, and related accessories for use by Huawei. AOS believes that AOS employees in China then transferred all of these items to Huawei.
10. By exporting the items from the United States and then transferring (in-country) to Huawei on four occasions items subject to the EAR without the required authorization from BIS, AOS engaged in conduct prohibited by the Regulations and committed four violations of Section 764.2(a) of the Regulations.

**Charges 5 -15      15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation by Forwarding Items Subject to the EAR to a Company on the BIS Entity List Without Authorization**

11. On or around June 16, 2019, at AOS’s request, AOS outside counsel provided AOS with guidance that explicitly defined activities involving Huawei that would be permissible or prohibited without first obtaining a license from BIS. The draft guidance from outside counsel stated that AOS employees “may not provide any AOS products to Huawei or any of its affiliates” that “originate from the United States, are being supplied or transferred from the United States, or otherwise have transited or will transit through the United States.” This guidance further clarified that “even an item [that was not otherwise subject to the EAR] could not be provided to Huawei if it is being exported or reexported to Huawei from or through the United States.” AOS did not distribute the guidance to its employees or take steps to understand whether AOS employees were exporting items from the United States for end use by Huawei.
12. Based on the above-referenced guidance from outside counsel, AOS knew or had reason to know that—even though the smart power stages, controllers, and related accessories were foreign-produced—authorization from BIS was required to export the hardware from the United States to China for use by Huawei. Between June 16, 2019, and November 22, 2019, on eleven occasions AOS exported to an AOS facility in China approximately 1,056 smart power stages, power controllers, and related accessories for use by Huawei. AOS believes that AOS employees in China then transferred the items to Huawei. AOS did not apply for or obtain licenses for these transactions.
13. By transferring (in-country) hardware subject to the EAR to a company on the Entity List without the required license and with knowledge or a reason to know that a violation of the Regulations had occurred, was occurring, or was about to occur, AOS committed eleven violations of Section 764.2(e) of the Regulations.

WHEREAS, BIS and AOS 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, AOS 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:

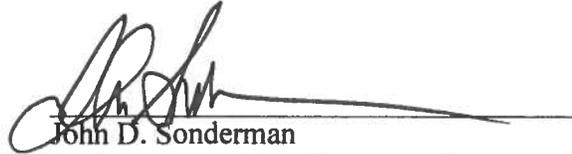
FIRST, AOS shall be assessed a civil penalty in the amount of \$4,250,000, the payment of which shall be made to the U.S. Department of Commerce within 30 days of the date of this Order.

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 date specified herein, AOS 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 AOS. Accordingly, if AOS should fail to pay the civil penalty in a full and timely manner, the undersigned may issue an order denying all of AOS'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.



John D. Sonderman  
Performing the Non-Exclusive Functions  
and Duties of the Assistant Secretary of  
Commerce for Export Enforcement

Issued this 27 day of June, 2025.

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

In the Matter of:

Alpha and Omega Semiconductor Incorporated  
475 Oakmead Pkwy  
Sunnyvale, CA 94085

Respondent

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Alpha and Omega Semiconductor Incorporated (“AOS” or the “Company”), 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”).<sup>1</sup>

WHEREAS, BIS has notified AOS of its intention to initiate an administrative proceeding against AOS, pursuant to the Regulations;

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

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conduct prohibited by the Regulations on 15 occasions when it forwarded from the United States without authorization from BIS approximately 1,650 power controllers, smart power stages, and related accessories to Huawei Technology Co. Ltd. (“Huawei”), a company listed on the BIS Entity List.<sup>2</sup> On eleven of these fifteen occasions, AOS knew—or had reason to know, including the awareness of a high probability that an event may occur—that a violation of the Regulations had occurred, was occurring, or was about to occur.<sup>3</sup>

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the United States referencing the AOS executives' meeting with Huawei and informing the AOS employees in the U.S. that AOS "can provide products to Huawei even digital power." The email from the AOS employee in Taiwan requested that AOS employees in the United States export 200 smart power stage samples to an AOS engineer in Shenzhen for evaluation by Huawei. AOS employees in the United States exported the requested items the same day.

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China then transferred the items to Huawei. AOS did not apply for or obtain licenses for these transactions.

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

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

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

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

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

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

1. BIS has jurisdiction over AOS, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.
2. The following sanctions shall be imposed against AOS:

a. AOS shall be assessed a civil penalty in the amount of \$4,250,000, 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 AOS. Failure to make full and timely payment of the civil penalty may result in the denial of all of AOS'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, AOS hereby waives all rights to further procedural steps in this matter, 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. AOS also waives and will not assert any Statute of Limitations defense, and the Statute of Limitations will be tolled, in connection with any violation of the Act or the Regulations arising out of the transactions identified in the Proposed Charging Letter or in connection with collection of the civil penalty or enforcement of this Agreement and the Order, if issued, from the date of the Order, until AOS pays in full the civil penalty agreed to in Paragraph 2.a of this Agreement.

4. BIS agrees that upon full and timely payment of the civil penalty as set forth in Paragraph 2.a above, BIS will not initiate any further administrative proceeding

against AOS in connection with any violation of the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter and covered by the Statute of Limitations Agreements executed between the Parties.

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, or appropriate designee, 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, or appropriate designee, 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 Settlement 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

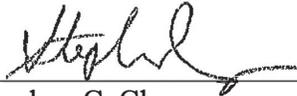
DAN CLUTCH

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Date: 2025.06.24 22:11:28  
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Dan Clutch  
Acting Director of Export Enforcement

Date: 6/24/2025

ALPHA AND OMEGA SEMICONDUCTOR  
INCORPORATED



Stephen C. Chang  
Chief Executive Officer, Alpha and Omega  
Semiconductor Incorporated

Date: 6/23/2025

Reviewed and approved by:



Melissa Mannino, Esq.  
Artie McConnell, Esq.  
James Perry, Esq.  
Baker & Hostetler LLP  
Counsel for Alpha and Omega Semiconductor  
Incorporated

Date: 06-23-2025

## PROPOSED CHARGING LETTER

Alpha and Omega Semiconductor Incorporated  
475 Oakmead Pkwy  
Sunnyvale, CA 94085

*Attention:* Stephen C. Chang, Chief Executive Officer

Dear Mr. Chang,

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that Alpha and Omega Semiconductor Incorporated (“AOS” or the “Company”) committed fifteen violations of the Export Administration Regulations (the “Regulations” or “EAR”).<sup>1</sup> Specifically, BIS charges the following violations:

### STATEMENT OF CHARGES

1. AOS—located in Sunnyvale, California—designs, develops, and supplies power semiconductors for a range of applications, including personal and portable computers, graphics cards, flat panel TVs, home appliances, smart phones, battery packs, quick chargers, servers, and telecommunications equipment. As described in greater detail below and in the attached Schedule of Violations, between on or about May 28, 2019 and on or about November 22, 2019, AOS engaged in conduct prohibited by the Regulations on 15 occasions when it forwarded from the United States without authorization from BIS approximately 1,650 power controllers, smart power stages, and related accessories to Huawei Technology Co. Ltd. (“Huawei”), a company listed on the BIS Entity List.<sup>2</sup> On eleven of these fifteen occasions, AOS knew—or had reason to know, including the awareness of a high probability that an event may occur—that a violation of the Regulations had occurred, was occurring, or was about to occur.<sup>3</sup>
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<sup>6</sup> The Digital Power business unit was eliminated in 2021 as it never generated any significant revenue.

7. On or around May 18, 2019, AOS's outside counsel provided guidance to AOS that BIS authorization would not be required for products assembled in China and which did not contain more than a *de minimis* amount of controlled U.S.-origin content, as such products would not be subject to the EAR. Outside counsel noted in its guidance that it had not been provided with facts specific to the products AOS intended to provide to Huawei and suggested that if AOS was unsure whether the products at issue were subject to the EAR, AOS should immediately halt supply of the items to Huawei pending further analysis of whether they were subject to the EAR. Despite ongoing discussions between AOS and outside counsel about other issues related to the relationship with Huawei throughout the summer of 2019, AOS did not seek guidance from outside counsel regarding the permissibility of exporting the sample products from the United States to Huawei for testing and evaluation purposes.
8. On or around May 28, 2019, AOS senior executives traveled to China to meet with Huawei to discuss AOS's status as a possible supplier to Huawei. Later that same day, an AOS employee based in Taiwan sent an email to AOS employees in the United States referencing the AOS executives' meeting with Huawei and informing the AOS employees in the U.S. that AOS "can provide products to Huawei even digital power." The email from the AOS employee in Taiwan requested that AOS employees in the United States export 200 smart power stage samples to an AOS engineer in Shenzhen for evaluation by Huawei. AOS employees in the United States exported the requested items the same day.
9. Between May 28, 2019 and June 7, 2019, on four occasions AOS employees in the United States exported to an AOS facility in China approximately 600 sample smart power stages power controllers, and related accessories for use by Huawei. AOS believes that AOS employees in China then transferred all of these items to Huawei.
10. By exporting the items from the United States and then transferring (in-country) to Huawei on four occasions items subject to the EAR without the required authorization from BIS, AOS engaged in conduct prohibited by the Regulations and committed four violations of Section 764.2(a) of the Regulations.

**Charges 5 -15      15 C.F.R. § 764.2(e) – Acting with Knowledge of a Violation by Forwarding Items Subject to the EAR to a Company on the BIS Entity List Without Authorization**

11. On or around June 16, 2019, at AOS's request, AOS outside counsel provided AOS with guidance that explicitly defined activities involving Huawei that would be permissible or prohibited without first obtaining a license from BIS. The draft guidance from outside counsel stated that AOS employees "may not provide any AOS products to Huawei or any of its affiliates" that "originate from the United States, are being supplied or transferred from the United States, or otherwise have transited or will transit through the United States." This guidance further clarified that "even an item [that was not otherwise subject to the EAR] could not be provided to Huawei if it is being exported or reexported

to Huawei from or through the United States.” AOS did not distribute the guidance to its employees or take steps to understand whether AOS employees were exporting items from the United States for end use by Huawei.

12. Based on the above-referenced guidance from outside counsel, AOS knew or had reason to know that—even though the smart power stages, controllers, and related accessories were foreign-produced—authorization from BIS was required to export the hardware from the United States to China for use by Huawei. Between June 16, 2019, and November 22, 2019, on eleven occasions AOS exported to an AOS facility in China approximately 1,056 smart power stages, power controllers, and related accessories for use by Huawei. AOS believes that AOS employees in China then transferred the items to Huawei. AOS did not apply for or obtain licenses for these transactions.
13. By transferring (in-country) hardware subject to the EAR to a company on the Entity List without the required license and with knowledge or a reason to know that a violation of the Regulations had occurred, was occurring, or was about to occur, AOS committed eleven violations of Section 764.2(e) of the Regulations.

\* \* \* \* \*

Accordingly, AOS 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:

- The maximum civil penalty allowed by law of up to the greater of \$374,474 per violation,<sup>7</sup> or twice the value of the transaction that is the basis of the violation;<sup>8</sup>
- Denial of export privileges;
- Exclusion from practice before BIS; and/or
- Any other liability, sanction, or penalty available under law.

If AOS 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(a) and 766.7(a). If AOS defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to AOS. The Under Secretary of

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<sup>7</sup> *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* 89 Fed. Reg. 106,308 (Dec. 30, 2024) (adjusting for inflation the maximum civil monetary penalty under ECRA from \$364,992 to \$374,474, effective January 15, 2025).

<sup>8</sup> *See* Export Control Reform Act of 2018, 50 U.S.C. § 4819(c)(1)(A) (2019).

Commerce for Industry and Security may then impose up to the maximum penalty for the charges in this letter. 15 C.F.R. § 766.7(a).

AOS 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. AOS 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 AOS have a proposal to settle this case, AOS should transmit it to the attorneys representing BIS named below.

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

Chief Counsel for Industry and Security  
Attention: Gregory Michelsen, Esq. & Jonathan Vukicevich, Esq.  
Room H-3839  
14th Street and Constitution Avenue, N.W.  
Washington, D.C. 20230

Gregory Michelsen and Jonathan Vukicevich are the attorneys representing BIS in this case; any communications that AOS may wish to have concerning this matter should occur through them. Mr. Michelsen and Mr. Vukicevich may be contacted via email at gmichelsen@doc.gov and jvukicevich@doc.gov, respectively.

Sincerely,

Dan Clutch  
Acting Director  
Office of Export Enforcement

**Schedule of Violations**

| <b>Charge</b> | <b>Date of Export</b> | <b>Item</b>                                     | <b>Classification</b> | <b>Destination</b>                   | <b>Violation</b> |
|---------------|-----------------------|---|-----------------------|--------------------------------------|------------------|
| 1             | 05/28/2019            | AOZ5473,<br>200 PCS                             | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(a)         |
| 2             | 05/31/2019            | AOZ96779<br>DEMO<br>Board, 1 PC                 | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(a)         |
| 3             | 06/07/2019            | AOZ5473,<br>200 PCS                             | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(a)         |
| 4             | 06/07/2019            | AOZ96779,<br>200 PCS                            | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(a)         |
| 5             | 06/26/2019            | AOZ5473,<br>135 PCS                             | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(e)         |
| 6             | 07/12/2019            | AOZ96779,<br>400 PCS                            | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(e)         |
| 7             | 07/27/2019            | AOZ96779,<br>50 PCS                             | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(e)         |
| 8             | 07/31/2019            | AOZ96779<br>DEMO and<br>EVAL<br>Board, 2<br>PCS | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(e)         |
| 9             | 8/5/2019              | PMBUS<br>DONGLES<br>WITH<br>CABLES,<br>5 PCS    | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(e)         |
| 10            | 8/8/2019              | PMBUS<br>DONGLES<br>WITH<br>CABLES,<br>5 PCS    | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(e)         |
| 11            | 08/23/2019            | AOZ96779<br>EVAL<br>Board, 1 PC                 | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(e)         |
| 12            | 9/12/2019             | NVM<br>Board, 1 PC                              | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(e)         |
| 13            | 10/01/2019            | AOZ96779,<br>49 PCS                             | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(e)         |
| 14            | 10/21/2019            | AOZ96779,<br>406 PCS                            | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(e)         |
| 15            | 11/22/2019            | AOZ96779<br>DEMO<br>Board, 1 PC                 | EAR99                 | China; Huawei Technology<br>Co. Ltd. | 764.2(e)         |