

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

In the Matter of:)
)
Cabela's Incorporated)
One Cabela Drive)
Sidney, NE 69160)
)
Respondent)

ORDER RELATING TO CABELA'S INCORPORATED

The Bureau of Industry and Security, U.S. Department of Commerce ("BIS"), has notified Cabela's Incorporated ("Cabela's") of its intention to initiate an administrative proceeding against Cabela's pursuant to Section 766.18(a) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2008)) (the "Regulations"),¹ and Section 13(c) of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (the "Act"),² through issuance of a proposed charging letter to Cabela's that alleged that Cabela's committed 152 violations of the Regulations.

Specifically, these charges are:

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2008). The violations charged occurred during 2004-2005. The Regulations governing the violations at issue are found in the 2004-2005 versions of the Code of Federal Regulations. 15 C.F.R. Parts 730-774 (2004-2005). The 2008 Regulations govern the procedural aspects of this case.

² Since August 21, 2001 the Act has been in lapse. However, the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of July 23, 2008 (73 Fed. Reg. 43,603 (July 25, 2008)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707 (2000)).

Charges 1 - 59 15 C.F.R. § 764.2(a): Exporting Optical Sighting Devices Without the Required Licenses.

On 59 occasions, from on or about May 25, 2004 through on or about May 6, 2005, Cabela's engaged in conduct prohibited by the Regulations by exporting optical sighting devices, items subject to the Regulations and classified under ECCN 0A987, to Argentina, Brazil, Canada, Chile, and Mexico without the Department of Commerce licenses required by Section 742.17 of the Regulations.³ In so doing, Cabela's committed 59 violations of Section 764.2(a) of the Regulations.

Charges 60 - 76 15 C.F.R. § 764.2(a): Exporting Optical Sighting Devices Without the Required Licenses.

On 17 occasions, from on or about May 12, 2004 through on or about May 17, 2005, Cabela's engaged in conduct prohibited by the Regulations by exporting optical sighting devices, items subject to the Regulations and classified under ECCN 0A987, to Finland, India, Ireland, Malaysia, Malta, Pakistan, Philippines, South Africa, Sweden, and Taiwan without the Department of Commerce licenses required by Section 742.7 of the Regulations. In so doing, Cabela's committed 17 violations of Section 764.2(a) of the Regulations.

Charges 77 – 152 15 C.F.R. § 764.2(a): Failing to File Shipper's Export Declarations.

In connection with the transactions described in Charges 1-76, on 76 occasions, from on or about May 12, 2004 through on or about May 17, 2005, Cabela's refrained from engaging in conduct required by the Regulations when it failed to file Shipper's Export Declarations ("SEDs") with the U.S. Government. Section 758.1 of the Regulations required that SEDs be filed with the U.S. Government for all exports subject to the Regulations that required a license, regardless of value, or destination. The exports referenced in Charges 1-76 and Schedule A involved exports of items subject to the Regulations that required an export license for the destinations to which they were exported. In failing to file the required SEDs, Cabela's committed 76 violations of Section 764.2(a) of the Regulations.

WHEREAS, BIS and Cabela's 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, and

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

³ The term "ECCN" refers to an Export Control Classification Number. *See* 15 C.F.R. § 772.1 (2008).

IT IS THEREFORE ORDERED:

FIRST, that a civil penalty of \$680,000 is assessed against Cabela's, of which \$340,000 shall be paid to the U.S. Department of Commerce not later than November 30, 2008, and the balance of \$340,000 shall be paid to the U.S. Department of Commerce not later than January 31, 2009. Payment shall be made in the manner specified in the attached instructions.

SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (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 dates specified herein, Cabela's 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.

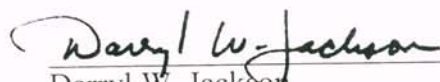
THIRD, that the timely payment of the civil penalty set forth above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Cabela's. Accordingly, if Cabela's should fail to pay the civil penalty in a timely manner, the undersigned may enter an Order denying all of Cabela's export privileges for a period of one year from the date of entry of this Order.

FOURTH, that Cabela's shall perform an audit of its internal compliance program within 12 months of the date of entry of the Order. Said audit shall be in substantial compliance with the Export Management System audit module, which is available from the BIS website at <http://www.bis.doc.gov/complianceandenforcement/ExportManagementSystems.htm>, which is incorporated by reference. A copy of said audit report shall be transmitted to the Office of Export Enforcement, High Point Plaza,

Suite 530, 4415 West Harrison Street, Hillside, IL 60162, no later than 13 months from the date of entry of the Order.

FIFTH, 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.



Darryl W. Jackson
Assistant Secretary of Commerce
for Export Enforcement

Entered this 7th day of November, 2008.

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

In the Matter of:)
)
Cabela's Incorporated)
One Cabela Drive)
Sidney, NE 69160)
)
Respondent)

SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") is made by and between Cabela's Incorporated ("Cabela's") 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 (currently codified at 15 C.F.R. Parts 730-774 (2008)) (the "Regulations"),¹ issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (the "Act"),²

WHEREAS, BIS has notified Cabela's of its intention to initiate an administrative proceeding against Cabela's, pursuant to the Act and the Regulations;

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2008). The violations charged occurred during 2004-2005. The Regulations governing the violations at issue are found in the 2004-2005 versions of the Code of Federal Regulations. 15 C.F.R. Parts 730-774 (2004-2005). The 2008 Regulations govern the procedural aspects of this case.

² Since August 21, 2001 the Act has been in lapse. However, the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of July 23, 2008 (73 Fed. Reg. 43,603 (July 25, 2008)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707 (2000)).

WHEREAS, BIS has issued a proposed charging letter to Cabela's that alleged that Cabela's committed 152 violations of the Regulations, specifically:

Charges 1 - 59 15 C.F.R. § 764.2(a): Exporting Optical Sighting Devices Without the Required Licenses.

On 59 occasions, from on or about May 25, 2004 through on or about May 6, 2005, Cabela's engaged in conduct prohibited by the Regulations by exporting optical sighting devices, items subject to the Regulations and classified under ECCN 0A987, to Argentina, Brazil, Canada, Chile, and Mexico without the Department of Commerce licenses required by Section 742.17 of the Regulations.³ In so doing, Cabela's committed 59 violations of Section 764.2(a) of the Regulations.

Charges 60 - 76 15 C.F.R. § 764.2(a): Exporting Optical Sighting Devices Without the Required Licenses.

On 17 occasions, from on or about May 12, 2004 through on or about May 17, 2005, Cabela's engaged in conduct prohibited by the Regulations by exporting optical sighting devices, items subject to the Regulations and classified under ECCN 0A987, to Finland, India, Ireland, Malaysia, Malta, Pakistan, Philippines, South Africa, Sweden, and Taiwan without the Department of Commerce licenses required by Section 742.7 of the Regulations. In so doing, Cabela's committed 17 violations of Section 764.2(a) of the Regulations.

Charges 77 – 152 15 C.F.R. § 764.2(a): Failing to File Shipper's Export Declarations.

In connection with the transactions described in Charges 1-76, on 76 occasions, from on or about May 12, 2004 through on or about May 17, 2005, Cabela's refrained from engaging in conduct required by the Regulations when it failed to file Shipper's Export Declarations ("SEDs") with the U.S. Government. Section 758.1 of the Regulations required that SEDs be filed with the U.S. Government for all exports subject to the Regulations that required a license, regardless of value, or destination. The exports referenced in Charges 1-76 and Schedule A involved exports of items subject to the Regulations that required an export license for the destinations to which they were exported. In failing to file the required SEDs, Cabela's committed 76 violations of Section 764.2(a) of the Regulations.

³ The term "ECCN" refers to an Export Control Classification Number. *See* 15 C.F.R. § 772.1 (2008).

WHEREAS, Cabela's 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, Cabela's fully understands the terms of this Agreement and 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;

WHEREAS, Cabela's enters into this Agreement voluntarily and with full knowledge of its rights;

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

WHEREAS, Cabela's neither admits nor denies the allegations contained in the proposed charging letter;

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

WHEREAS, Cabela's agrees to be bound by the Order, if entered;

NOW THEREFORE, the Parties hereby agree as follows:

1. BIS has jurisdiction over Cabela's, under the Regulations, in connection with the matters alleged in the proposed charging letter.

2. The following sanction shall be imposed against Cabela's in complete settlement of the alleged violations of the Regulations relating to the transactions specifically detailed in the proposed charging letter:

a. Cabela's shall be assessed a civil penalty in the amount of \$680,000, of which \$340,000 shall be paid to the U.S. Department of Commerce

not later than November 30, 2008, and the balance of \$340,000 shall be paid to the U.S. Department of Commerce not later than January 31, 2009.

b. The timely payment of the civil penalty agreed to in paragraph 2.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 Cabela's. Failure to make timely payment of the civil penalty set forth above may result in the denial of all of Cabela's export privileges for a period of one year from the date of imposition of the penalty.

c. Cabela's shall perform an audit of its internal compliance program within 12 months of the date of entry of the Order. Said audit shall be in substantial compliance with the Export Management System audit module, which is available from the BIS website at <http://www.bis.doc.gov/complianceand enforcement/ExportManagementSystems.htm>, which is incorporated by reference. A copy of said audit report shall be transmitted to the Office of Export Enforcement, High Point Plaza, Suite 530, 4415 West Harrison Street, Hillside, IL 60162, no later than 13 months from the date of entry of the Order.

3. Subject to the approval of this Agreement pursuant to paragraph 8 hereof, Cabela's hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violations of this Agreement or the Order, if entered), 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 entered; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if entered.

4. Upon entry of the Order and timely payment of the \$680,000 civil penalty, BIS will not initiate any further administrative proceeding against Cabela's in connection with any violation of the Act or the Regulations arising out of the transactions identified in the proposed charging letter.

5. BIS will make the proposed charging letter, this Agreement, and the Order, if entered, available to the public.

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

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

8. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement approves it by 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.

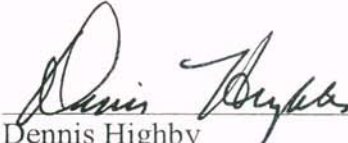
BUREAU OF INDUSTRY AND SECURITY
U.S. DEPARTMENT OF COMMERCE



Thomas Madigan
Director
Office of Export Enforcement

Date: 10/31/08

CABELA'S INCORPORATED



Dennis Highby
President and CEO

Date: 10-30-08

REVIEWED/APPROVED
CABELA'S LEGAL DEPT. *PH*

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Cabela's Incorporated
One Cabela Drive
Sidney, NE 69160

Attention: Dennis Highby
President and CEO

Dear Mr. Highby:

The Bureau of Industry and Security, U. S. Department of Commerce ("BIS"), has reason to believe that Cabela's, Incorporated, of Sidney, Nebraska ("Cabela's") has committed 152 violations of the Export Administration Regulations (the "Regulations"),¹ which are issued under the authority of the Export Administration Act of 1979, as amended (the "Act").² Specifically, BIS charges that Cabela's committed the following violations:

Charges 1 - 59 15 C.F.R. § 764.2(a): Exporting Optical Sighting Devices Without the Required Licenses.

As described in greater detail in Schedule A, which is enclosed herewith and incorporated herein by reference, on 59 occasions, from on or about May 25, 2004 through on or about May 6, 2005, Cabela's engaged in conduct prohibited by the Regulations by exporting optical sighting devices, items subject to the Regulations and classified under ECCN 0A987, to Argentina, Brazil, Canada, Chile, and Mexico without the Department of Commerce licenses required by 742.17 of the Regulations.³ In so doing, Cabela's committed 59 violations of Section 764.2(a) of the Regulations.

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2008). The violations charged occurred in 2004-2005. The Regulations governing the violations at issue are found in the 2004-2005 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2004-2005)). The 2008 Regulations govern the procedural aspects of this case.

² 50 U.S.C. app. §§ 2401- 2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of July 23, 2008 (73 Fed. Reg. 43603 (July 25, 2008)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1706 (2000)) ("IEEPA").

³ The term "ECCN" refers to an Export Control Classification Number. See 15 C.F.R. § 772.1 (2008).

Charges 60 - 76 15 C.F.R. § 764.2(a): Exporting Optical Sighting Devices Without the Required Licenses.

As described in greater detail in Schedule A, which is enclosed herewith and incorporated herein by reference, on 17 occasions, from on or about May 12, 2004 through on or about May 17, 2005, Cabela's engaged in conduct prohibited by the Regulations by exporting optical sighting devices, items subject to the Regulations and classified under ECCN 0A987, to Finland, India, Ireland, Malaysia, Malta, Pakistan, Philippines, South Africa, Sweden, and Taiwan without the Department of Commerce licenses required by Sections 742.7 of the Regulations. In so doing, Cabela's committed 17 violations of Section 764.2(a) of the Regulations.

Charges 77 – 152 15 C.F.R. § 764.2(a): Failing to File Shipper's Export Declarations.

In connection with the transactions described in Charges 1-76, on 76 occasions, from on or about May 12, 2004 through on or about May 17, 2005, Cabela's refrained from engaging in conduct required by the Regulations when it failed to file Shipper's Export Declarations ("SEDs") with the U.S. Government. Section 758.1 of the Regulations required that SEDs be filed with the U.S. Government for all exports subject to the Regulations that required a license, regardless of value, or destination. The exports referenced in Charges 1-76 and Schedule A involved exports of items subject to the Regulations that required an export license for the destinations to which they were exported. In failing to file the required SEDs, Cabela's committed 76 violations of Section 764.2(a) of the Regulations.

* * * * *

Accordingly, Cabela's 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 up to the greater of \$250,000 per violation or twice the value of the transaction that is the basis of the violation;⁴

Denial of export privileges; and/or

Exclusion from practice before BIS.

If Cabela's 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 Cabela's defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Cabela's. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty on each of the charges in this letter.

⁴ See International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

Cabela's is hereby notified that it is entitled to an agency hearing on the record if it files a written demand for one with its answer. (Regulations, Section 766.6). Cabela's 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).

Cabela's is further notified that under the Small Business Regulatory Enforcement Flexibility Act, Cabela's 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 Regulations provide for settlement without a hearing. (Regulations, Section 766.18). Should Cabela's have a proposal to settle this case, Cabela's representative should transmit it to the attorney representing BIS named below.

The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, Cabela'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 Cabela's answer must be served on BIS at the following address:

Chief Counsel for Industry and Security
Attention: Eric Clark, Esq.
Room H-3839
United States Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Eric Clark is the attorney representing BIS in this case; any communications that Cabela's may wish to have concerning this matter should occur through him. He may be contacted by telephone at (202) 482-5301.

Sincerely,

Thomas Madigan
Director
Office of Export Enforcement

Schedule A - Schedule of Violations

<u>CHARGES</u>	<u>DATE</u>	<u>COMMODITY</u>	<u>QUANTITY</u>	<u>ECCN</u>	<u>DESTINATION</u>	<u>ORDER#</u>	<u>VALUE</u>
1, 77	07/28/04	BSA Red Dot .22 Scope	1	0A987	Canada	66701154	19.99
2, 78	08/16/04	BSA Red Dot .22 Scope	1	0A987	Canada	67007981	19.99
3, 79	08/19/04	BSA Red Dot .22 Scope	1	0A987	Canada	67059261	19.99
4, 80	08/27/04	BSA Red Dot .22 Scope	1	0A987	Canada	67175420	19.99
5, 81	08/31/04	BSA Red Dot .22 Scope	1	0A987	Canada	67281801	19.99
6, 82	09/09/04	BSA Red Dot .22 Scope	1	0A987	Canada	67404030	19.99
7, 83	09/13/04	BSA Red Dot .22 Scope	1	0A987	Canada	67492865	19.99
8, 84	09/16/04	BSA Red Dot .22 Scope	1	0A987	Canada	67571642	19.99
9, 85	09/22/04	BSA Red Dot .22 Scope	1	0A987	Canada	67675078	19.99
10, 86	09/22/04	BSA Red Dot .22 Scope	1	0A987	Canada	67689623	19.99
11, 87	09/23/04	BSA Red Dot .22 Scope	1	0A987	Canada	67769647	19.99
12, 88	09/27/04	BSA Red Dot .22 Scope	1	0A987	Canada	67808642	19.99
13, 89	09/27/04	BSA Red Dot .22 Scope	1	0A987	Canada	67823423	19.99
14, 90	09/27/04	BSA Red Dot .22 Scope	1	0A987	Canada	67812367	19.99
15, 91	09/29/04	BSA Red Dot .22 Scope	1	0A987	Canada	67890321	19.99
16, 92	09/30/04	BSA Red Dot .22 Scope	1	0A987	Canada	67851998	19.99
17, 93	09/30/04	BSA Red Dot .22 Scope	1	0A987	Canada	67881826	19.99
18, 94	09/30/04	BSA Red Dot .22 Scope	1	0A987	Canada	67887665	19.99
19, 95	09/30/04	BSA Red Dot .22 Scope	1	0A987	Canada	67904631	19.99
20, 96	10/04/04	BSA Red Dot .22 Scope	1	0A987	Canada	67860873	19.99
21, 97	10/04/04	BSA Red Dot .22 Scope	1	0A987	Canada	67951303	19.99
22, 98	10/04/04	BSA Red Dot .22 Scope	1	0A987	Canada	67972092	19.99
23, 99	10/05/04	BSA Red Dot .22 Scope	1	0A987	Canada	67991468	19.99
24, 100	10/19/04	BSA Red Dot .22 Scope	1	0A987	Canada	68255827	19.99
25, 101	10/19/04	BSA Red Dot .22 Scope	1	0A987	Canada	68278310	19.99
26, 102	10/20/04	BSA Red Dot .22 Scope	1	0A987	Canada	68282626	19.99
27, 103	10/26/04	BSA Red Dot .22 Scope	1	0A987	Canada	68490042	19.99
28, 104	10/27/04	BSA Red Dot .22 Scope	1	0A987	Canada	66410321	19.99
29, 105	11/15/04	BSA Red Dot .22 Scope	1	0A987	Canada	69051655	19.99
30, 106	11/16/04	BSA Red Dot .22 Scope	1	0A987	Canada	69008078	19.99
31, 107	11/16/04	BSA Red Dot .22 Scope	1	0A987	Canada	69009204	19.99
32, 108	11/16/04	BSA Red Dot .22 Scope	1	0A987	Canada	69021355	19.99

<u>CHARGES</u>	<u>DATE</u>	<u>COMMODITY</u>	<u>QUANTITY</u>	<u>ECCN</u>	<u>DESTINATION</u>	<u>ORDER#</u>	<u>VALUE</u>
33, 109	11/17/04	BSA Red Dot .22 Scope	1	0A987	Canada	69060216	19.99
34, 110	11/17/04	BSA Red Dot .22 Scope	1	0A987	Canada	69092219	19.99
35, 111	11/19/04	BSA Red Dot .22 Scope	1	0A987	Canada	69119313	19.99
36, 112	11/19/04	BSA Red Dot .22 Scope	1	0A987	Canada	69123591	19.99
37, 113	11/19/04	BSA Red Dot .22 Scope	1	0A987	Canada	69131235	19.99
38, 114	11/19/04	BSA Red Dot .22 Scope	1	0A987	Canada	69136791	19.99
39, 115	11/19/04	BSA Red Dot .22 Scope	1	0A987	Canada	69145783	19.99
40, 116	11/19/04	BSA Red Dot .22 Scope	1	0A987	Canada	69156600	19.99
41, 117	11/22/04	BSA Red Dot .22 Scope	1	0A987	Canada	69189341	19.99
42, 118	11/22/04	BSA Red Dot .22 Scope	1	0A987	Canada	69190167	19.99
43, 119	11/23/04	BSA Red Dot .22 Scope	1	0A987	Canada	69204111	19.99
44, 120	11/23/04	BSA Red Dot .22 Scope	1	0A987	Canada	69223226	19.99
45, 121	05/04/05	Tru-Glo Red Dot Scope	1	0A987	Canada	73473582	19.99
46, 122	05/06/05	Tru-Glo Tru Open Point	1	0A987	Canada	73553936	19.99
47, 123	05/03/05	Aimpoint Comp ML2 Scope	1	0A987	Canada	73402614	419.99
48, 124	05/25/04	BSA Red Dot .22 Scope	1	0A987	Mexico	65856443	24.99
49, 125	05/26/04	BSA Red Dot .22 Scope	1	0A987	Brazil	65821038	24.99
50, 126	06/07/04	BSA Red Dot .22 Scope	1	0A987	Chile	66101671	24.99
51, 127	06/09/04	BSA Red Dot .22 Scope	1	0A987	Mexico	66031153	24.99
52, 128	08/16/04	BSA Red Dot .22 Scope	5	0A987	Chile	67010313	99.95
53, 129	08/18/04	BSA Red Dot .22 Scope	2	0A987	Brazil	67032470	49.98
54, 130	09/07/04	BSA Red Dot .22 Scope	1	0A987	Argentina	67396596	19.99
55, 131	09/08/04	BSA Red Dot .22 Scope	1	0A987	Brazil	67424418	19.99
56, 132	09/14/04	BSA Red Dot .22 Scope	1	0A987	Brazil	67583126	19.99
57, 133	10/06/04	BSA Red Dot .22 Scope	1	0A987	Brazil	68085305	19.99
58, 134	11/16/04	BSA Red Dot .22 Scope	1	0A987	Argentina	69044701	19.99
59, 135	04/25/05	Simmons Multi-Reticle Red Dot	1	0A987	Brazil	73366651	99.99
60, 136	05/12/04	BSA Red Dot .22 Scope	1	0A987	South Africa	65637684	24.99
61, 137	08/23/04	BSA Red Dot .22 Scope	1	0A987	Finland	67173282	24.99
62, 138	08/04/04	BSA Red Dot .22 Scope	2	0A987	Malaysia	66754768	49.98
63, 139	08/13/04	BSA Red Dot .22 Scope	1	0A987	Pakistan	67014061	19.99

<u>CHARGES</u>	<u>DATE</u>	<u>COMMODITY</u>	<u>QUANTITY</u>	<u>ECCN</u>	<u>DESTINATION</u>	<u>ORDER#</u>	<u>VALUE</u>
64, 140	09/17/04	BSA Red Dot .22 Scope	1	0A987	Ireland	67662027	19.99
65, 141	09/21/04	BSA Red Dot .22 Scope	1	0A987	South Africa	67722484	19.99
66, 142	10/01/04	BSA Red Dot .22 Scope	1	0A987	South Africa	67928724	19.99
67, 143	10/18/04	BSA Red Dot .22 Scope	1	0A987	South Africa	68324038	24.99
68, 144	11/02/04	BSA Red Dot .22 Scope	2	0A987	South Africa	68694843	49.98
69, 145	11/05/04	BSA Red Dot .22 Scope	2	0A987	Malaysia	68809116	49.98
70, 146	11/15/04	BSA Red Dot .22 Scope	2	0A987	Taiwan	68594381	44.98
71, 147	11/16/04	BSA Red Dot .22 Scope	2	0A987	Taiwan	69056376	44.98
72, 148	11/17/04	BSA Red Dot .22 Scope	2	0A987	Taiwan	69069772	19.99
73, 149	03/04/05	Bushnell Red Green Multi-Reticle	1	0A987	Malta	72255619	109.99
74, 150	03/08/05	Burris Speed Dot 135 Sight	1	0A987	Sweden	72406355	199.99
75, 151	05/04/05	Tru-Glo Tru Open Point	1	0A987	India	73458843	229.99
76, 152	05/17/05	Burris Fullfield II Scope	1	0A987	Philippines	73693114	229.99