

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

In the Matter of:

Billy L. Powell, Sr.
1911 Hickory Creek
Kingwood, TX 77339

Respondent

ORDER RELATING TO
BILLY L. POWELL, SR.

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Billy L. Powell, Sr. of Kingwood, TX (“Powell”), of its intention to initiate an administrative proceeding against Powell pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),¹ and Section 13(c) of the Export Administration Act of 1979, as amended (the “Act”),² through the issuance of a Proposed Charging Letter to Powell that alleges that Powell committed fifty violations of the Regulations. Specifically, the charges are:

Charges 1-50 15 C.F.R. § 764.2(e) -- Acting with Knowledge of a Violation

On fifty occasions, between on or about January 14, 2006, and on or about February 23, 2008, Powell violated the Regulations by selling or transferring various oil and gas

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2013). The charged violations occurred in 2006-2008. The Regulations governing the violations at issue are found in the 2006-2008 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774) (2006-2008)). The 2013 Regulations set forth the procedures that apply to this matter.

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 August 15, 2012 (77 Fed. Reg. 49699 (Aug. 16, 2012)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*) (2006 & Supp. IV 2010).

equipment parts, items subject to the Regulations³ and the Iranian Transactions Regulations,⁴ that were exported or to be exported from the United States to Iran via transshipment through the United Arab Emirates, with knowledge that a violation of the Regulations was occurring, was about to occur, or was intended to occur in connection with the items. Specifically, Powell sold or transferred the items with knowledge that licenses were required for such exports and that no licenses had been obtained. Pursuant to Section 560.204 of the Iranian Transactions Regulations administered by the Department of the Treasury's Office of Foreign Assets Control ("OFAC"), an export to a third country intended for transshipment to Iran is a transaction that requires OFAC authorization.⁵ Pursuant to Section 746.7 of the Regulations, no person may engage in the exportation of an item subject to both the Regulations and the Iranian Transactions Regulations without authorization from OFAC. No OFAC authorization was obtained for the exports described herein.

Powell knew or had reason to know that he was violating the Regulations by engaging in these transactions, because prior to engaging in these transactions, Powell had knowledge of the U.S. Government's embargo on exports to Iran based on, *inter alia*, multiple outreach visits and contacts by U.S. law enforcement agents between 2000 and 2007, regarding the licensing requirements for exports to embargoed destinations, including Iran. In engaging in this activity, Powell committed fifty violations of Section 764.2(e) of the Regulations.

WHEREAS, BIS and Powell 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 These items were designated as EAR99, which is a designation for items subject to the Regulations but not listed on the Commerce Control List. 15 C.F.R. § 734.3(c) (2006-2008).

⁴ 31 C.F.R. Part 560 (2006-2008). Administered by the Treasury Department's Office of Foreign Assets Control ("OFAC"), the ITR were renamed the Iranian Transactions and Sanctions Regulations ("ITSR") and reissued in their entirety by OFAC on October 22, 2012. *See* 77 Fed. Reg. 64,664 (Oct. 22, 2012). Section 560.204 remains unchanged in pertinent part. *See* 31 C.F.R. § 560.204 (2006-2008 and 2012).

⁵ *See also* 15 CFR § 734.2(b)(6).

IT IS THEREFORE ORDERED:

FIRST, Powell shall be assessed a civil penalty in the amount of \$100,000, 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 (2000)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and if payment is not made by the due date specified herein, Powell 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 for a period of five (5) years from the date of this Order, Billy L. Powell, Sr., with a last known address of 1911 Hickory Creek, Kingwood, TX 77339, and when acting for or on his behalf, his successors, assigns, representatives, agents, or employees (hereinafter collectively referred to as "Denied Person"), may not, directly or indirectly, participate in any way in any transaction involving any commodity, software or technology (hereinafter collectively referred to as "item") exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations, including, but not limited to:

- A. Applying for, obtaining, or using any license, License Exception, or export control document;
- B. Carrying on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction involving

any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations; or

- C. Benefitting in any way from any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations.

FOURTH, that no person may, directly or indirectly, do any of the following:

- A. Export or reexport to or on behalf of the Denied Person any item subject to the Regulations;
- B. Take any action that facilitates the acquisition or attempted acquisition by the Denied Person of the ownership, possession, or control of any item subject to the Regulations that has been or will be exported from the United States, including financing or other support activities related to a transaction whereby the Denied Person acquires or attempts to acquire such ownership, possession or control;
- C. Take any action to acquire from, or to facilitate the acquisition or attempted acquisition from, the Denied Person of any item subject to the Regulations that has been exported from the United States;
- D. Obtain from the Denied Person in the United States any item subject to the Regulations with knowledge or reason to know that the item will be, or is intended to be, exported from the United States; or
- E. Engage in any transaction to service any item subject to the Regulations that has been or will be exported from the United States and which is owned, possessed or controlled by the Denied Person, or service any item, of whatever origin, that is owned, possessed or controlled by the Denied

Person if such service involves the use of any item subject to the Regulations that has been or will be exported from the United States. For purposes of this paragraph, servicing means installation, maintenance, repair, modification or testing.

FIFTH, that, after notice and opportunity for comment as provided in Section 766.23 of the Regulations, any person, firm, corporation, or business organization related to the Denied Person by affiliation, ownership, control, or position of responsibility in the conduct of trade or related services may also be made subject to the provisions of the Order.

SIXTH, that the Proposed Charging Letter, the Settlement Agreement, and this Order shall be made available to the public.

SEVENTH, that this Order shall be served on Powell, and shall be published in the *Federal Register*.

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



David W. Mills
Assistant Secretary of Commerce
for Export Enforcement

Issued this 19th day of June, 2013.

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

In the Matter of:)
)
Billy L. Powell, Sr.)
1911 Hickory Creek)
Kingwood, TX 77339)
)
Respondent)

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Billy L. Powell, Sr. (“Powell”), 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 issued pursuant to the Export Administration Act of 1979, as amended (the “Act”).²

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

WHEREAS, BIS has issued a Proposed Charging Letter to Powell that alleged that Powell committed 50 violations of the Regulations, specifically:

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2013). The charged violations occurred between 2006 and 2008. The Regulations governing the violations at issue are found in the 2006- 2008 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2006-08)). The 2013 Regulations set forth the procedures that apply to this matter.

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 13,222 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 August 15, 2012 (77 Fed. Reg. 49,699 (Aug. 16, 2012)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*) (2006 & Supp IV 2010).

Charges 1-50 15 C.F.R. § 764.2(e) -- Acting with Knowledge of a Violation

On fifty occasions, between on or about January 14, 2006, and on or about February 23, 2008, Powell violated the Regulations by selling or transferring various oil and gas equipment parts, items subject to the Regulations³ and the Iranian Transactions Regulations,⁴ that were exported or to be exported from the United States to Iran via transshipment through the United Arab Emirates, with knowledge that a violation of the Regulations was occurring, was about to occur, or was intended to occur in connection with the items. Specifically, Powell sold or transferred the items with knowledge that licenses were required for such exports and that no licenses had been obtained. Pursuant to Section 560.204 of the Iranian Transactions Regulations administered by the Department of the Treasury's Office of Foreign Assets Control ("OFAC"), an export to a third country intended for transshipment to Iran is a transaction that requires OFAC authorization.⁵ Pursuant to Section 746.7 of the Regulations, no person may engage in the exportation of an item subject to both the Regulations and the Iranian Transactions Regulations without authorization from OFAC. No OFAC authorization was obtained for the exports described herein.

Powell knew or had reason to know that he was violating the Regulations by engaging in these transactions, because prior to engaging in these transactions, Powell had knowledge of the U.S. Government's embargo on exports to Iran based on, *inter alia*, multiple outreach visits and contacts by U.S. law enforcement agents between 2000 and 2007, regarding the licensing requirements for exports to embargoed destinations, including Iran. In engaging in this activity, Powell committed fifty violations of Section 764.2(e) of the Regulations.

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

³ These items were designated as EAR99, which is a designation for items subject to the Regulations but not listed on the Commerce Control List. 15 C.F.R. § 734.3(c) (2006-2008).

⁴ 31 C.F.R. Part 560 (2006-2008). Administered by the Treasury Department's Office of Foreign Assets Control ("OFAC"), the ITR were renamed the Iranian Transactions and Sanctions Regulations ("ITSR") and reissued in their entirety by OFAC on October 22, 2012. *See* 77 Fed. Reg. 64,664 (Oct. 22, 2012). Section 560.204 remains unchanged in pertinent part. *See* 31 C.F.R. § 560.204 (2006-2008 and 2012).

⁵ *See also* 15 CFR § 734.2(b)(6).

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

WHEREAS, the parties enter into this Agreement having taken into consideration a plea agreement that Powell has agreed to enter into with the U.S. Attorney’s Office for the Southern District of Texas.

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

WHEREAS, Powell neither admits nor denies the allegations contained in the Proposed Charging Letter;

WHEREAS, Powell wishes to settle and dispose of all matters alleged in the Proposed Charging Letter by entering into this Agreement; and

WHEREAS, Powell 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 Powell, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.
2. The following sanction shall be imposed against Powell in complete settlement of the alleged violations of the Regulations relating to the transactions specifically detailed in the Proposed Charging Letter:

a. Powell shall be assessed a civil penalty in the amount of \$100,000, 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. For a period of five (5) years from the date of the Order, Billy L. Powell, Sr., with a last known address of 1911 Hickory Creek, Kingwood, TX 77339, and when acting for or on his behalf, his successors, assigns, representatives, agents, or employees (hereinafter collectively referred to as "Denied Person"), may not, directly or indirectly, participate in any way in any transaction involving any commodity, software or technology (hereinafter collectively referred to as "item") exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations, including, but not limited to:

- i. Applying for, obtaining, or using any license, License Exception, or export control document;
- ii. Carrying on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or in any other activity subject to the Regulations; or
- iii. Benefitting in any way from any transaction involving any item exported or to be exported from the United States that

is subject to the Regulations, or in any other activity subject to the Regulations.

3. Subject to the approval of this Agreement pursuant to Paragraph 8 hereof, Powell 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 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. Powell 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 the Agreement and Order, if issued, from the date of the Order until the later of the date Powell pays in full the civil penalty agreed to in Paragraph 2.a of this Agreement or has complied with any sentence imposed upon or following entry of his plea and conviction.

4. BIS agrees that upon full and timely payment of the civil penalty as set forth in Paragraph 2.a above and Powell's compliance with the plea agreement and any sentence imposed upon or following the entry of his plea and conviction, BIS will not initiate any further administrative proceeding against Powell in connection with any violation of the Act or the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter.

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

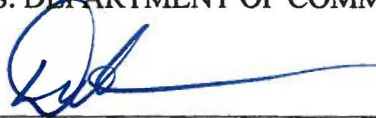
6. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement pursuant to Section 766.18(a) of the Regulations, no Party may use this Agreement in any administrative or judicial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

8. 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.


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



Douglas R. Hassebrock
Director of Export Enforcement

BILLY L. POWELL, SR.

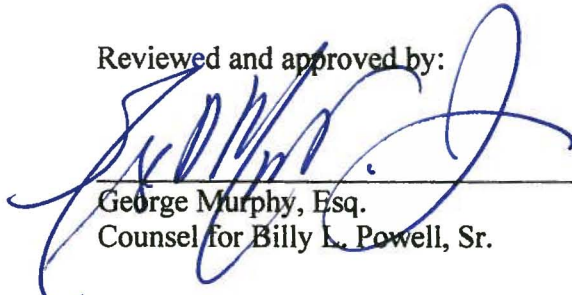


Billy L. Powell, Sr.

Date: 6/14/13, 2013

Date: May 29, 2013

Reviewed and approved by:



George Murphy, Esq.
Counsel for Billy L. Powell, Sr.

Date: June 5, 2013

PROPOSED CHARGING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Billy L. Powell, Sr.
1911 Hickory Creek
Kingwood, TX 77339

Dear Mr. Powell:

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that you, Billy L. Powell, Sr. (“Powell”), of Kingwood, Texas, committed fifty violations of the Export Administration Regulations (the “Regulations”),¹ which issued under the authority of the Export Administration Act of 1979, as amended (the “Act”).² Specifically, BIS alleges that Powell committed the following violations:

Charges 1-50 15 C.F.R. § 764.2(e) -- Acting with Knowledge of a Violation

As described in greater detail in the attached Schedule of Violations, which is incorporated herein by reference, on fifty occasions, between on or about January 14, 2006, and on or about February 23, 2008, Powell violated the Regulations by selling or transferring various oil and gas equipment parts, items subject to the Regulations³ and the Iranian Transactions Regulations,⁴ that were exported or to be exported from the United States to Iran via transshipment through the United Arab Emirates, with knowledge that a violation of the Regulations was occurring, was about to occur, or was intended to occur in connection with the items. Specifically, Powell sold or transferred the items with knowledge that licenses were required for such exports and that no licenses had been obtained. Pursuant to Section 560.204 of the Iranian Transactions Regulations administered by the Department of the Treasury’s Office of Foreign Assets Control

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2013). The violations alleged occurred in 2006-2008. The Regulations governing the violations at issue are found in the 2006-2008 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2006-2008)). The 2013 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 13,222 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 August 15, 2012 (77 Fed. Reg. 49,699 (Aug. 16, 2012)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*) (2006 & Supp IV 2010).

³ These items were designated as EAR99, which is a designation for items subject to the Regulations but not listed on the Commerce Control List. 15 C.F.R. § 734.3(c) (2006-2008).

⁴ 31 C.F.R. Part 560 (2006-2008). Administered by the Treasury Department’s Office of Foreign Assets Control (“OFAC”), the ITR were renamed the Iranian Transactions and Sanctions Regulations (“ITSR”) and reissued in their entirety by OFAC on October 22, 2012. *See* 77 Fed. Reg. 64,664 (Oct. 22, 2012). Section 560.204 remains unchanged in pertinent part. *See* 31 C.F.R. § 560.204 (2006-2008 and 2012).

("OFAC"), an export to a third country intended for transshipment to Iran is a transaction that requires OFAC authorization.⁵ Pursuant to Section 746.7 of the Regulations, no person may engage in the exportation of an item subject to both the Regulations and the Iranian Transactions Regulations without authorization from OFAC. No OFAC authorization was obtained for the exports described herein.

Powell knew or had reason to know that he was violating the Regulations by engaging in these transactions, because prior to engaging in these transactions, Powell had knowledge of the U.S. Government's embargo on exports to Iran based on, *inter alia*, multiple outreach visits and contacts by U.S. law enforcement agents between 2000 and 2007, regarding the licensing requirements for exports to embargoed destinations, including Iran. In engaging in this activity, Powell committed fifty violations of Section 764.2(e) of the Regulations.

* * * * *

Accordingly, Powell is hereby notified that an administrative proceeding is instituted against him 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;⁶
- Denial of export privileges; and/or
- Exclusion from practice before BIS.

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

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

⁵ *See also* 15 CFR § 734.2(b)(6).

⁶ *See* International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

Billy L. Powell, Sr.
Proposed Charging Letter
Page 3 of 3

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

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

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

Gregory Michelsen is the attorney representing BIS in this case; any communications that Powell may wish to have concerning this matter should occur through him. Mr. Michelsen may be contacted by telephone at (202) 482-5301.

Sincerely,

Douglas R. Hassebrock
Director
Office of Export Enforcement

Billy L. Powell Sr.
Schedule of Violations

Charge(s)	Export Date	Commodity	ECCN	Value/Item	Destination	Violation
1	1/14/2006	Parts for Oil & Gas Equipment	EAR99	\$16,845.00	Iran	15 CFR 764.2(e)
2	1/21/2006	Parts for Oil & Gas Equipment	EAR99	\$38,118.00	Iran	15 CFR 764.2(e)
3	2/18/2006	Parts for Oil & Gas Equipment	EAR99	\$6,999.00	Iran	15 CFR 764.2(e)
4	3/11/2006	Parts for Oil & Gas Equipment	EAR99	\$14,654.00	Iran	15 CFR 764.2(e)
5	3/17/2006	Parts for Oil & Gas Equipment	EAR99	\$3,422.00	Iran	15 CFR 764.2(e)
6	3/21/2006	Parts for Oil & Gas Equipment	EAR99	\$4,338.00	Iran	15 CFR 764.2(e)
7	3/25/2006	Parts for Oil & Gas Equipment	EAR99	\$14,260.00	Iran	15 CFR 764.2(e)
8	5/8/2006	Parts for Oil & Gas Equipment	EAR99	\$13,665.00	Iran	15 CFR 764.2(e)
9	5/27/2006	Parts for Oil & Gas Equipment	EAR99	\$4,833.00	Iran	15 CFR 764.2(e)
10	6/9/2006	Parts for Oil & Gas Equipment	EAR99	\$14,391.00	Iran	15 CFR 764.2(e)
11	7/8/2006	Parts for Oil & Gas Equipment	EAR99	\$33,461.00	Iran	15 CFR 764.2(e)
12	7/22/2006	Parts for Oil & Gas Equipment	EAR99	\$18,481.00	Iran	15 CFR 764.2(e)
13	8/26/2006	Parts for Oil & Gas Equipment	EAR99	\$12,278.00	Iran	15 CFR 764.2(e)
14	9/2/2006	Parts for Oil & Gas Equipment	EAR99	\$15,710.00	Iran	15 CFR 764.2(e)
15	9/28/2006	Parts for Oil & Gas Equipment	EAR99	\$13,721.00	Iran	15 CFR 764.2(e)
16	10/19/2006	Parts for Oil & Gas Equipment	EAR99	\$38,340.00	Iran	15 CFR 764.2(e)
17	12/9/2006	Parts for Oil & Gas Equipment	EAR99	\$30,465.00	Iran	15 CFR 764.2(e)
18	12/30/2006	Parts for Oil & Gas Equipment	EAR99	\$9,215.00	Iran	15 CFR 764.2(e)
19	2/18/2007	Parts for Oil & Gas Equipment	EAR99	\$6,721.00	Iran	15 CFR 764.2(e)
20	2/24/2009	Parts for Oil & Gas Equipment	EAR99	\$4,420.00	Iran	15 CFR 764.2(e)
21	2/27/2007	Parts for Oil & Gas Equipment	EAR99	\$36,363.00	Iran	15 CFR 764.2(e)
22	3/9/2007	Parts for Oil & Gas Equipment	EAR99	\$55,909.00	Iran	15 CFR 764.2(e)
23	3/10/2007	Parts for Oil & Gas Equipment	EAR99	\$18,903.00	Iran	15 CFR 764.2(e)
24	3/10/2007	Parts for Oil & Gas Equipment	EAR99	\$4,890.00	Iran	15 CFR 764.2(e)
25	3/17/2007	Parts for Oil & Gas Equipment	EAR99	\$81,701.00	Iran	15 CFR 764.2(e)
26	3/17/2007	Parts for Oil & Gas Equipment	EAR99	\$126,928.00	Iran	15 CFR 764.2(e)
27	3/24/2007	Parts for Oil & Gas Equipment	EAR99	\$15,644.00	Iran	15 CFR 764.2(e)
28	4/7/2007	Parts for Oil & Gas Equipment	EAR99	\$10,967.00	Iran	15 CFR 764.2(e)
29	4/14/2007	Parts for Oil & Gas Equipment	EAR99	\$18,220.00	Iran	15 CFR 764.2(e)
30	4/17/2007	Parts for Oil & Gas Equipment	EAR99	\$23,310.00	Iran	15 CFR 764.2(e)
31	4/18/2007	Parts for Oil & Gas Equipment	EAR99	\$9,270.00	Iran	15 CFR 764.2(e)
32	5/3/2007	Parts for Oil & Gas Equipment	EAR99	\$15,955.00	Iran	15 CFR 764.2(e)
33	5/3/2007	Parts for Oil & Gas Equipment	EAR99	\$12,524.00	Iran	15 CFR 764.2(e)
34	5/19/2007	Parts for Oil & Gas Equipment	EAR99	\$39,575.00	Iran	15 CFR 764.2(e)
35	5/19/2007	Parts for Oil & Gas Equipment	EAR99	\$76,332.00	Iran	15 CFR 764.2(e)
36	6/2/2007	Parts for Oil & Gas Equipment	EAR99	\$108,236.00	Iran	15 CFR 764.2(e)
37	6/23/2007	Parts for Oil & Gas Equipment	EAR99	\$34,152.00	Iran	15 CFR 764.2(e)
38	7/28/2007	Parts for Oil & Gas Equipment	EAR99	\$40,026.00	Iran	15 CFR 764.2(e)
39	8/18/2007	Parts for Oil & Gas Equipment	EAR99	\$154,339.00	Iran	15 CFR 764.2(e)
40	8/25/2007	Parts for Oil & Gas Equipment	EAR99	\$35,866.00	Iran	15 CFR 764.2(e)
41	8/28/2007	Parts for Oil & Gas Equipment	EAR99	\$39,296.00	Iran	15 CFR 764.2(e)
42	9/27/2007	Parts for Oil & Gas Equipment	EAR99	\$4,248.00	Iran	15 CFR 764.2(e)
43	10/18/2007	Parts for Oil & Gas Equipment	EAR99	\$6,100.00	Iran	15 CFR 764.2(e)
44	11/22/2007	Parts for Oil & Gas Equipment	EAR99	\$37,714.00	Iran	15 CFR 764.2(e)
45	12/28/2007	Parts for Oil & Gas Equipment	EAR99	\$10,334.00	Iran	15 CFR 764.2(e)
46	12/29/2007	Parts for Oil & Gas Equipment	EAR99	\$10,276	Iran	15 CFR 764.2(e)
47	1/26/2008	Parts for Oil & Gas Equipment	EAR99	\$34,446	Iran	15 CFR 764.2(e)
48	1/28/2008	Parts for Oil & Gas Equipment	EAR99	\$23,771	Iran	15 CFR 764.2(e)
49	2/16/2008	Parts for Oil & Gas Equipment	EAR99	\$50,332	Iran	15 CFR 764.2(e)
50	2/23/2008	Parts for Oil & Gas Equipment	EAR99	\$119,446	Iran	15 CFR 764.2(e)