

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

In the Matter of:

Exyte Management GmbH,
Loewentorborgen 9b,
70376 Stuttgart, Deutschland

Respondent

**ORDER RELATING TO
EXYTE MANAGEMENT GMBH.**

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) has notified Exyte Management GmbH of Stuttgart, Germany (“Exyte”) of its intention to initiate an administrative proceeding against Exyte pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),¹ through the issuance of a Proposed Charging Letter to Exyte that alleges 13 violations of the Regulations.² Specifically:

GENERAL ALLEGATIONS

Exyte Shanghai Ltd., (“Exyte China”) is a member of the Exyte group located in the People’s Republic of China. As described further below, between on or about March 8, 2021, through on or about March 24, 2022, Exyte China violated the Regulations when it caused, counseled, procured, or aided the in-country transfer of items subject to the EAR to a party on the Entity List without the required license or other authorization from BIS. Specifically, Exyte China caused, counseled, procured, and aided the transfer of approximately 884 EAR99 items used to fabricate semiconductors to Semiconductor Manufacturing International (Beijing) Corporation (“SMIC Beijing”), a party on the Entity List. At all relevant times, a license for the export, reexport, or transfer (in-country) of items subject to the EAR to SMIC Beijing was required under § 744.11 of the Regulations.

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

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730–774 (2025). The charged violations occurred in 2021–22. The Regulations governing the violations at issue are found in the 2021 and 2022 versions of the Code of Federal Regulations (15 C.F.R. Parts 730–774 (2021); 15 C.F.R. Parts 730–774 (2022)). The 2024 Regulations set forth the procedures that apply to this matter.

STATEMENT OF CHARGES

Charge 1-13 15 C.F.R. § 764.2(b) – Causing, Aiding, or Abetting a Violation

1. Between on or about March 8, 2021 and March 24, 2022, Exyte China engaged in conduct prohibited by the Regulations on 13 separate occasions when it caused, procured, counseled or aided the purchase and transfer of items subject to the EAR, including flowmeters, pressure transmitters, logic controllers, and voltage sag protectors, collectively valued at approximately \$2,850,030, to SMIC Beijing, a party on the Entity List,³ without the required license or other authorization from BIS.
2. Between on or about March 8, 2021 and March 24, 2022, Exyte China caused the transfer of 6 voltage sag protectors; 1 programmable logic controller; 450 flowmeters; 75 exhaust stack flowmeters; and 352 pressure transmitters, all items subject to the EAR, from suppliers in China to SMIC Beijing. Exyte China knew that SMIC Beijing was the end user of the items and that the items would be transferred in-country for use in constructing a semiconductor fabrication facility; however, Exyte China did not appreciate that a licensing requirement pursuant to the EAR applied to the in-country transfers of goods subject to the EAR by China-based distributors to a customer in China.
3. Upon learning of these in-country transfers, Exyte investigated the matter, voluntarily disclosed the transactions to BIS, and retained outside counsel to investigate.
4. The items Exyte China caused to be transferred are classified as EAR99.⁴ They have a variety of applications, including in the production of semiconductors. Some or all of these items appear to have been for use in semiconductor fabrication facilities to measure, control, or adjust voltage, exhaust (emissions), pressure, volume or mass flow.
5. Pursuant to § 744.11 and Supplement No. 4 to Part 744 of the EAR, a license is required to export, reexport, or transfer (in-country) any item subject to the EAR when an entity that is listed on the Entity List is a party to the transaction as described in § 748.5(c)–(f) of the EAR. At all times relevant to the charges in this letter, BIS authorization was required to export, reexport, or transfer (in-country) any item subject to the EAR to SMIC Beijing.

³ See 85 Fed. Reg. 83,420 (Dec. 22, 2020). Following the conduct discussed in this proposed charging letter, BIS updated the Entity List and maintained SMIC Beijing's inclusion on the Entity List. 89 Fed. Reg. 96,836 (Dec. 5, 2024).

⁴ EAR99 is a designation for items subject to the EAR but not listed on the Commerce Control List. See § 734.3(c) of the EAR.

6. Exyte China facilitated the in-country transfers at issue, without identifying the need for a license, because of Exyte's inadequate corporate compliance controls with respect to the applicability of U.S. export controls over in-country transfers by local Chinese suppliers. Exyte's compliance program did not adequately address the license requirements pursuant to the EAR for engaging with a local distributor in China to deliver items subject to the EAR to a customer on the Entity List.

WHEREAS, BIS and Exyte has 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, Exyte 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, Exyte shall be assessed a civil penalty in the amount of \$1,500,000, the payment of which shall be made to the U.S. Department of Commerce within 75 days of this Order.

SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701–3720E (2012)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and if payment is not made by the due dates specified herein, Exyte 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 Exyte.

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.



David Peters
Assistant Secretary for Export Enforcement

Issued this 7th day of January, 2026.

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

In the Matter of:

Exyte Management GmbH,
Loewentorbogen 9b,
70376 Stuttgart, Deutschland

Respondent

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Exyte Management GmbH (“Exyte”) of Stuttgart, Germany and the Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) (collectively, the “Parties”), pursuant to Section 766.18(a) of the Export Administration Regulations (the “Regulations”).¹

WHEREAS Exyte filed a voluntary self-disclosure with BIS's Office of Export Enforcement in accordance with Section 764.5 of the Regulations concerning the transactions at issue herein and has made investment in and improvement of its compliance program;

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

WHEREAS, BIS has issued a Proposed Charging Letter to Exyte that alleges that Exyte committed 13 violations of the Regulations, specifically:

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

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730–774 (2024). The charged violations occurred in 2021 through 2022. The Regulations governing the violations at issue are found in the 2021 through 2022 version of the Code of Federal Regulations (15 C.F.R. Parts 730–774 (2022)). The 2024 Regulations set forth the procedures that apply to this matter.

GENERAL ALLEGATIONS

Exyte Shanghai Ltd., (“Exyte China”) is a member of the Exyte group located in the People’s Republic of China. As described further below, between on or about March 8, 2021, through on or about March 24, 2022, Exyte China violated the Regulations when it caused, counseled, procured, or aided the in-country transfer of items subject to the EAR to a party on the Entity List without the required license or other authorization from BIS. Specifically, Exyte China caused, counseled, procured, and aided the transfer of approximately 884 EAR99 items used to fabricate semiconductors to Semiconductor Manufacturing International (Beijing) Corporation (“SMIC Beijing”), a party on the Entity List. At all relevant times, a license for the export, reexport, or transfer (in-country) of items subject to the EAR to SMIC Beijing was required under § 744.11 of the Regulations.

STATEMENT OF CHARGES

Charge 1-13 15 C.F.R. § 764.2(b) – Causing, Aiding, or Abetting a Violation

1. Between on or about March 8, 2021 and March 24, 2022, Exyte China engaged in conduct prohibited by the Regulations on 13 separate occasions when it caused, procured, counseled or aided the purchase and transfer of items subject to the EAR, including flowmeters, pressure transmitters, logic controllers, and voltage sag protectors, collectively valued at approximately \$2,850,030, to SMIC Beijing, a party on the Entity List,³ without the required license or other authorization from BIS.
2. Between on or about March 8, 2021 and March 24, 2022, Exyte China caused the transfer of 6 voltage sag protectors; 1 programmable logic controller; 450 flowmeters; 75 exhaust stack flowmeters; and 352 pressure transmitters, all items subject to the EAR, from suppliers in China to SMIC Beijing. Exyte China knew that SMIC Beijing was the end user of the items and that the items would be transferred in-country for use in constructing a semiconductor fabrication facility; however, Exyte China did not appreciate that a licensing requirement pursuant to the EAR applied to the in-country transfers of goods subject to the EAR by China-based distributors to a customer in China.
3. Upon learning of these in-country transfers, Exyte investigated the matter, voluntarily disclosed the transactions to BIS, and retained outside counsel to investigate.
4. The items Exyte China caused to be transferred are classified as EAR99.⁴ They have a variety of applications, including in the production of semiconductors. Some or all of

³ See 85 Fed. Reg. 83,420 (Dec. 22, 2020). Following the conduct discussed in this proposed charging letter, BIS updated the Entity List and maintained SMIC Beijing’s inclusion on the Entity List. 89 Fed. Reg. 96,836 (Dec. 5, 2024).

⁴ EAR99 is a designation for items subject to the EAR but not listed on the Commerce Control List. See § 734.3(c) of the EAR.

these items appear to have been for use in semiconductor fabrication facilities to measure, control, or adjust voltage, exhaust (emissions), pressure, volume or mass flow.

5. Pursuant to § 744.11 and Supplement No. 4 to Part 744 of the EAR, a license is required to export, reexport, or transfer (in-country) any item subject to the EAR when an entity that is listed on the Entity List is a party to the transaction as described in § 748.5(c)–(f) of the EAR. At all times relevant to the charges in this letter, BIS authorization was required to export, reexport, or transfer (in-country) any item subject to the EAR to SMIC Beijing.
6. Exyte China facilitated the in-country transfers at issue, without identifying the need for a license, because of Exyte's inadequate corporate compliance controls with respect to the applicability of U.S. export controls over in-country transfers by local Chinese suppliers. Exyte's compliance program did not adequately address the license requirements pursuant to the EAR for engaging with a local distributor in China to deliver items subject to the EAR to a customer on the Entity List.

WHEREAS, Exyte 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, Exyte has reviewed, with the assistance of counsel, the terms of this Agreement, 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, and the Proposed Charging Letter, and understands the terms of all three documents;

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

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

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

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

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

1. BIS has jurisdiction over Exyte, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.

2. The following sanctions shall be imposed against Exyte:

a. Exyte shall be assessed a civil penalty in the amount of \$1,500,000, the payment of which shall be made to the U.S. Department of Commerce within 75 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 Exyte.

3. Subject to the approval of this Agreement pursuant to Paragraph 7 hereof, Exyte hereby waive all rights to further procedural steps in this matter (except the procedural steps set forth in Sections 766.17(c) and 766.18(c) of the Regulations with respect to the possible activation of suspended sanctions due to a violation of this Agreement or the Order, if issued), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if issued; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued. Exyte also waives and will not assert any Statute of Limitations defense, and

the Statute of Limitations will be tolled, in connection with any violation of ECRA or the Regulations arising out of the transactions identified in the Proposed Charging Letter or in connection with collection of the civil penalty or enforcement of this Agreement and the Order, if issued, from the date of the Order, until Exyte pays in full the civil penalty agreed to in Paragraph 2.a of this Agreement.

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

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

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

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

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

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

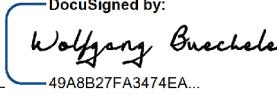
9. Each signatory affirms that he/she has authority to enter into this Agreement and to bind his/her respective party to the terms and conditions set forth herein.

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

STEVEN FISHER
Digitally signed by STEVEN
FISHER
Date: 2025.12.12 11:22:58 -05'00'
Steven Fisher
Acting Director of Export Enforcement

Date: _____

EXYTE MANAGEMENT GMBH

DocuSigned by:

49A8B27FA3474EA...
Dr. Wolfgang Buechele
Chief Executive Officer
10-Dec-2025
Date: _____

Signed by:

A715EF4241FA404...
Peter Schoenhofer
Chief Financial Officer
10-Dec-2025
Date: _____

Reviewed and approved by:

Nabeel Youssef
Nabeel Youssef
Freshfield US LLP
Counsel for Exyte Management GmbH

Date: December 11, 2025

PROPOSED CHARGING LETTER

Exyte Management GmbH,
Loewentorbogen 9b,
70376 Stuttgart, Deutschland

Attention: Nabeel Yousef, Freshfields US LLP

Dear Mr. Yousef,

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that Exyte Management GmbH (“Exyte”), an entity providing consulting and planning, engineering and design, and project and construction management to clients worldwide in the semiconductor, battery, biopharma, life sciences industries, and data center industries¹ committed 13 violations of the Export Administration Regulations (the “Regulations” or “EAR”).² Specifically, BIS alleges the following:

GENERAL ALLEGATIONS

Exyte Shanghai Ltd., (“Exyte China”) is a member of the Exyte group located in the People’s Republic of China. As described further below and in the attached Schedule of Violations, between on or about March 8, 2021, through on or about March 24, 2022, Exyte China violated the Regulations when it caused, counseled, procured, or aided the in-country transfer of items subject to the EAR to a party on the Entity List without the required license or other authorization from BIS. Specifically, Exyte China caused, counseled, procured, and aided the transfer of approximately 884 EAR99 items used to fabricate semiconductors to Semiconductor Manufacturing International (Beijing) Corporation (“SMIC Beijing”), a party on the Entity List. At all relevant times, a license for the export, reexport, or transfer (in-country) of items subject to the EAR to SMIC Beijing was required under § 744.11 of the Regulations.

¹ Exyte, *Annual Report 2023*, at 10, available [here](#).

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730–774 (2024). The charged violations occurred in 2021 through 2022. The Regulations governing the violations at issue are found in the 2021 through 2022 versions of the Code of Federal Regulations (15 C.F.R. Parts 730–774 (2022–2023)). The 2025 Regulations set forth the procedures that apply to this matter.

STATEMENT OF CHARGES

Charge 1–13 15 C.F.R. § 764.2(b) – Causing, Aiding, or Abetting a Violation

1. Between on or about March 8, 2021 and March 24, 2022, Exyte China engaged in conduct prohibited by the Regulations on 13 separate occasions when it caused, procured, counseled or aided the purchase and transfer of items subject to the EAR, including flowmeters, pressure transmitters, logic controllers, and voltage sag protectors, collectively valued at approximately \$2,850,030, to SMIC Beijing, a party on the Entity List,³ without the required license or other authorization from BIS.
2. Between on or about March 8, 2021 and March 24, 2022, Exyte China caused the transfer of 6 voltage sag protectors; 1 programmable logic controller; 450 flowmeters; 75 exhaust stack flowmeters; and 352 pressure transmitters, all items subject to the EAR, from suppliers in China to SMIC Beijing. Exyte China knew that SMIC Beijing was the end user of the items and that the items would be transferred in-country for use in constructing a semiconductor fabrication facility; however, Exyte China did not appreciate that a licensing requirement pursuant to the EAR applied to the in-country transfers of goods subject to the EAR by China-based distributors to a customer in China.
3. Upon learning of these in-country transfers, Exyte investigated the matter, voluntarily disclosed the transactions to BIS, and retained outside counsel to investigate.
4. The items Exyte China caused to be transferred are classified as EAR99.⁴ They have a variety of applications, including in the production of semiconductors. Some or all of these items appear to have been for use in semiconductor fabrication facilities to measure, control, or adjust voltage, exhaust (emissions), pressure, volume or mass flow.
5. Pursuant to § 744.11 and Supplement No. 4 to Part 744 of the EAR, a license is required to export, reexport, or transfer (in-country) any item subject to the EAR when an entity that is listed on the Entity List is a party to the transaction as described in § 748.5(c)–(f) of the EAR. At all times relevant to the charges in this letter, BIS authorization was required to export, reexport, or transfer (in-country) any item subject to the EAR to SMIC Beijing.

³ See 85 Fed. Reg. 83,420 (Dec. 22, 2020). Following the conduct discussed in this proposed charging letter, BIS updated the Entity List and maintained SMIC Beijing’s inclusion on the Entity List. 89 Fed. Reg. 96,836 (Dec. 5, 2024).

⁴ EAR99 is a designation for items subject to the EAR but not listed on the Commerce Control List. See § 734.3(c) of the EAR.

6. Exyte China facilitated the in-country transfers at issue, without identifying the need for a license, because of Exyte's inadequate corporate compliance controls with respect to the applicability of U.S. export controls over in-country transfers by local Chinese suppliers. Exyte's compliance program did not adequately address the license requirements pursuant to the EAR for engaging with a local distributor in China to deliver items subject to the EAR to a customer on the Entity List.

* * * *

Accordingly, Exyte 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,⁵ or twice the value of the transaction that is the basis of the violation;⁶
- Denial of export privileges;
- Exclusion from practice before BIS; and/or
- Any other liability, sanction, or penalty available under law.

If Exyte 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 Exyte defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Exyte. 15 C.F.R. § 766.7(a). Exyte may then be subject to a sanction of up to the maximum penalty amount for the charges in this letter.

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

⁵ *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).

⁶ *See* Export Control Reform Act of 2018, 50 U.S.C. § 4819(c)(1)(A) (2019).

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

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

Jason Lebowitz and Kimberly Hsu are the attorneys representing BIS in this case; any communications that Exyte may wish to have concerning this matter should occur through them. Mr. Lebowitz may be contacted by phone at (240) 252-9183. Ms. Hsu may be reached at 202-482-5301.

Sincerely,

Steven Fisher
Acting Director
Office of Export Enforcement

Schedule of Violations

Charge No.	Shipment Date	Item(s) Description	Quantity	ECCN	Violation Type	Value
1	March 8, 2021	Hedland Flowmeter	8	EAR99	§ 764.2(b)	\$ 3,972.08
2	March 8, 2021	Hedland Flowmeter	10	EAR99	§ 764.2(b)	\$ 4,965.10
3	March 18, 2021	Hedland Flowmeter	2	EAR99	§ 764.2(b)	\$ 993.02
4	May 6, 2021	Hedland Flowmeter	252	EAR99	§ 764.2(b)	\$ 125,120.58
5	November 25, 2021	Hedland Flowmeter	44	EAR99	§ 764.2(b)	\$ 21,846.45
6	December 13, 2021	Hedland Flowmeter	26	EAR99	§ 764.2(b)	\$ 12,909.27
7	December 28, 2021	Allen Bradley Programmable Logic Controller (PLC)	1	EAR99	§ 764.2(b)	\$ 212,007.19
8	December 28, 2021	Rosemount Pressure Transmitter	51	EAR99	§ 764.2(b)	\$ 39,919.83
		Rosemount Exhaust Stack Flowmeter	26			\$ 126,473.66
9	January 14, 2022	Rosemount Pressure Transmitter	3	EAR99	§ 764.2(b)	\$ 54,722.71
		Rosemount Exhaust Stack Flowmeter	3			\$ 54,722.71
10	January 15, 2022	Hedland Flowmeter	81	EAR99	§ 764.2(b)	\$ 40,217.33
11	March 18, 2022	Hedland Flowmeter	27	EAR99	§ 764.2(b)	\$ 13,405.78
12	March 22, 2022	Allen Bradley DySC	6	EAR99	§ 764.2(b)	\$ 1,681,736.49
13	March 24, 2022	Rosemount Pressure Transmitter	298	EAR99	§ 764.2(b)	\$ 233,257.05
		Rosemount Exhaust Stack Flowmeter	46			\$ 223,761.09
Total Value of Shipments:						\$ 2,850,030.33