

TUESDAY, JULY 14, 2026

From Mistakes to Mastery: Lessons from a Voluntary Self-Disclosure



Star USA

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From Mistakes to Mastery: Lessons from a Voluntary Self-Disclosure

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QUESTION

► How did you get into trade compliance?

- A. I went to school for it.
- B. My job description...evolved.
- C. Someone quit - now it's my responsibility
- D. I started asking trade questions, then had to answer them
- E. I'm still not sure how I ended up here.
- F. Other (tell us in the chat!)

Let me introduce myself!







For course I can
ship
to Germany.
How hard could
it be?

HomeToolsPrinting ActivitiesImport-ExportUPS.comSupport

History

Create a Return

Multi-piece Shipment

Save Shipment

Repeat

Undo

Void

Track

Addresses

End of Day

Pickup Information

Message Center

NavigateShipment ActivitiesTrackManage AddressesEnd of DayPickupsMessage Center

Ship To

Ship From

Distribution

Service

Options

Detail

Reference

Customs Documentation

International Compliance

InvoiceEEICO

☒ Importer (Sold To) Same as Ship To

☐ Allow Multiple Currencies

Currency:

US dollar

Declaration Statement:

Invoice

Reason for Export:

Sale

Terms of Sale:

Unknown

Additional Comments:

Inv. Line Tot:

0.00

Discount:

Charges

Freight:

Insurance:

Other:

Total Inv. Amt:

0.00

☒ Create an Invoice

Paperless

☒ Process as Paperless

☐ Print Copy of Paperless Commercial Invoice

☐ Attach Documents to Package

☐ Packing List

[Access Additional Forms](#)

Preview Document

Help

Goods

Enter commodities below:

☐ Save/Update Commodities

#	EEI	CO	Description of Good	Part Number	UPC	ASIN	Harmonized Tariff Code	Country or Territory of C
1	☐	☐						United States



ECONOMIC
DEVELOPMENT
PARTNERSHIP of
NORTH CAROLINA





QUESTION

► How do you screen shipments for denied parties?

- A. Software program runs in the background
- B. Manually searching using the CSL or other screening list database.
- C. A combination of tools & manual checks
- D. We don't have a formal process yet
- E. What's denied party screening?
- F. Other (tell us in the chat!)

Export Compliance Form

Equilibar ensures that all shipments are done in accordance with Export Administration Regulations (EAR) and any diversion contrary to U.S. Law is prohibited. To maintain this compliance, we must have the following on file for every order for each application. If your order is for the same application, please contact the Sales Department and request a blanket export compliance form. Please answer the following:

Is this product going to be resold by you? _____ Yes ☒ No

Is this product going to be exported outside of the United States by you? ____ Yes ☒ No

Will this product be used on its own or incorporated to create a different product?
☒ On its Own _____ New Product

What is the end use of this product? Or, if this is going to be used to create a new product, what is the end use of the final product this will be a part of?

The product will be use as part of a core flood unit.

Who is the end user for this product? Where are they located? If you are not comfortable releasing this information, Equilibar is willing to sign a Non-Disclosure agreement with your company upon request.

SGS North America 8701 New Trails Drive, The Woodlands, TX 77381

If this product does not have a specific end user at this time (for example, it will be sold in mass quantity to many different end users) what countries will you be selling to? Or if it is a shorter list, what countries will you not be selling to?

This product will be used in USA

In agreement with Equilibar' Export Compliance Policy and the United States Government, the following company SGS North America agrees to not sell to and/or send Equilibar products to any countries on the US Denied Parties List which includes but is not limited to the US Embargo List and Sanctioned Countries. If you are unsure if your customer is on the Denied Parties List, please feel free to contact Equilibar and we will be happy to check.

By signing below, I agree that the information provided above is accurate to the best of my ability and agree to work with Equilibar to follow US Export Compliance Laws and Regulations.

Signature: YCAF *Gani Araujo de A*

Date: 03-31-2020

Screen for Denied Parties

View Results

[Printer Friendly View](#)

Request t6ywlWqG4PgVws8C8p has been processed.

Transaction References
Transaction Reference 1:

Denied Party Screener Results
Denied parties were found on the following government lists:
DOC-BISUL, OFAC-GLOMAG, DOC-ENT, WORLD-DEBR

Sort Results by Relevance:

Across All Government List ▼

Displaying 1-5 of 6
[Next](#)

Company / Contact Name(s)	Address	Government List
WENZHOU LUGANG TRANSPORTATION EQUIPMENT CO., LTD.	ROOM F, FLOOR 10, RAILWAY MANSION, WENZHOU AVENUE WENZHOU CITY	List Name:WORLD-DEBR List Description:World Bank:World Bank Listing of Ineligible Firms Control Agency:WORLD Last Regulatory Update:2021-08-10

Results provided by UPS: Thursday, 03/23/2023 09:46 AM EDT

The accuracy of the results returned above depend on, among others, information you provide the TradeAbility® Services, the specific Match Level you designate and other information available to UPS. As such, these results may not be complete or accurate for your needs. For more information, please consult the [UPS TradeAbility License and Service Agreement](#).

Next Steps
Repeat the transaction above or make another TradeAbility service request by selecting an option from the drop-down menu below.

Next Steps Options:

Repeat this Transaction ▼Go

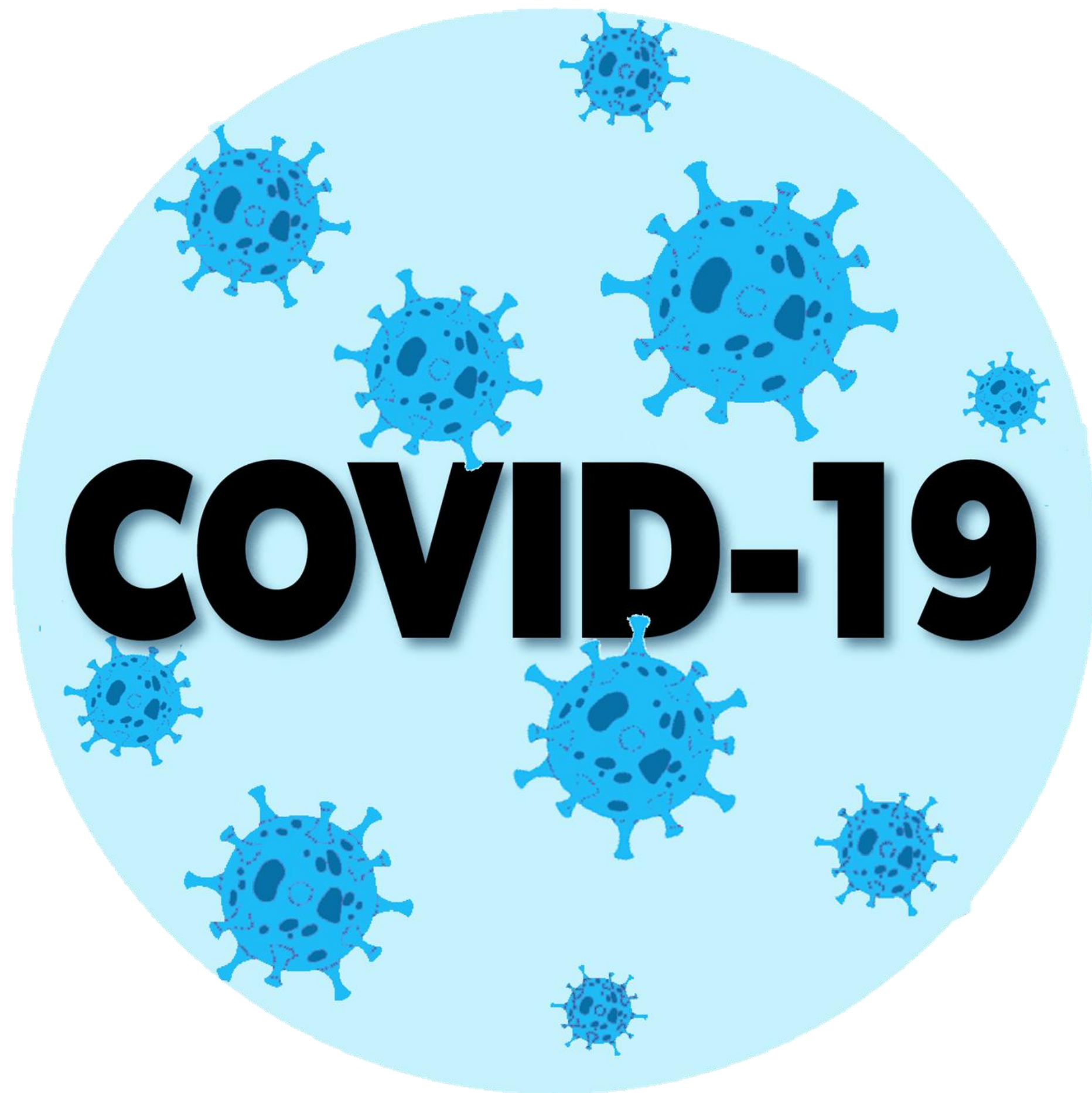
Denied Party Screen Information

Match Level
Low

[Save screener party name and address information to Address Book](#)

Party Name and Address Information
Guizhou Liyang

[Printer Friendly View](#)



Choose Your Region

Other

What can we assist you with?

I'm ready for a quotation.

Name

Changjun Liu

Company

Sichuan University

Email

liuchangjun@scu.edu.cn

Phone

+86-17092847790

Product needed

Back Pressure Regulator

Fluids & Phases (Liquid or Gas?)

gas-liquid mixture

Min & Max Pressure

0-10MPa; 0-40MPa

Min & Max Flow

0.1-500ml/min; 0.01-500ml/min

Max Temperature

150 degree C

Pipe Size

1/8"

Process description, questions or comments

one is gas-liquid reaction with solid catalyst. hydrodeoxygenation of xylitol, glucose and et al. we also planned using it for hydrodesulfuration and liquid phase oxidation of organic chloride.

the high pressure one is for supercritical water oxidation, the tail gas reached the back pressure regulator has been cooled to below 100 degree C.

the zero flow one is for an in situ cell of a ATR spectrometer.

the models we interest are H3P1SNN8-NSBP1500T150G15KV,

H3P1HNN8-NSBP1500T150G15KV,

ZF1SNN8-NSBP1500T150G15KV,

ZF1HNN8-NSBP1500T150G15KV,

H6P1SNN8-NSBP6000T150G15KV,

H6P1HNN8-NSBP6000T150G15KV, 1 piece for each models.

please provide the quotation for them, any better suggestions are welcomed. Thanks.

Country

China [CN]

**Quote Request from
our website:**

**Name: Changjun
Liu**

**Company: Sichuan
University**

The Buyers: Jimu International Trading Co., Ltd.
买 方: 极目国际贸易有限公司
Address: Suite 24,1st floor, Eden Plaza Eden Island,P0 Box 438,Mahe,Republic of Seychelles
Tel/ 电 话: +248 422 5558
Fax/ 传 真: +248 422 5307
E-mail/电子邮件: 12539877@qq.com

The Sellers:
卖 方:
Address:
Tel No.:
Fax No.:

Consignee: Cangrun Technology Development (Sichuan) Co., Ltd
收货人: 四川省康润科技发展有限公司
地 址: 成都市高新区创业路1号713室
Address: Room 713, No.1 Chuangye Road, Hi-Tech District, Chengdu 610041, China
TEL: 86-28-85183070 FAX: 86-28-85181820
Contact/联系人: MENG DAN/孟丹

This contract is made by and between the Buyers and the Sellers whereby the Buyers agree to buy and the Sellers agree to sell the under mentioned goods according to the terms and conditions stipulated below:
兹经买卖双方同意, 按照如下条款由买方购进卖方售出以下商品:

No. 序列 号	Description of Commodity 品名描述	Model 型号	Qty. 数量	Unit price (USD) 单价	Amount(USD) 总额
1	高压背压阀 Precision Back Pressure Regulator	U6L	2	USD	USD
	高压背压阀 Precision Back Pressure Regulator	U3L	2	USD	USD
TOTAL AMOUNT(USD):					
TOTAL VALUE: CIP CHENGDU AIRPORT SAY US DOLLARS NLX. 总价: CIP 成都机场 美元					

2. COUNTRY OF ORIGIN 生产国别:美国 USA
MANUFACTURES 制造厂商: Equilibar

3. PAYMENT TERM/付款条件:
30%TT in advance, 70% TT before shipment
30%预付款, 70%发货前付清

Sales Order Details

Buyer Name - Jimu International Trading Co.

Consignee - Cangrun Technology Development (Sichuan) Co.

Contact - Meng Dan

Sales Order Details

Buyer Name - Jimu International Trading Co.

Consignee - Cangrun Technology Development (Sichuan) Co.

Contact - Meng Dan

Quote Request from our website:

Name: Changjun Liu

Company: Sichuan University

Request t6ywLWqG5PRsbh8jD7 has been processed.

Transaction References
Transaction Reference 1:

Denied Party Screener Results
Denied parties were found on the following government lists:
DOC-ENT

Sort Results by Relevance:

Across All Government List

▼

Displaying 1-3 of 3

Sichuan University Sichuan University, Institute of Advanced Polymer Materials	No. 24 South Section 1, Yihuan Road Chengdu	List Name:DOC-ENT
	610065	List Description:BIS - Bureau of Industry and Security:Entity List Control Agency:DOC
Sichuan University, Luzhou Industrial Technology Research Institute Sichuan University, Qingdao Research Institute Sichuan University, Suzhou Research Institute	No. 29 Jiuyanqiao Wangjiang Road Chengdu	Last Regulatory Update:2023-03-04
	610064	Remarks:
	Peoples South Road Chengdu	

Violation

Shipped to a company on the denied party list because we missed a company name only listed on the quote request form.

Immediate Action

1. Contacted the customer to make sure the product was still in their possession and obtained proof (white paper) that the unit has not and will not be used in a military or government capacity.
2. Decide to ignore the mistake or file a voluntary disclosure.



QUESTION

► What best describes your experience with a Voluntary Self Disclosure (VSD)?

- A. I completed one.
- B. In the middle of one right now.
- C. Pretty sure one is in our future.
- D. Fingers crossed we never need one.
- E. Wait...should I be worried?
- F. I'd rather not answer.

Equilibar Product Materials Used



Anodized Aluminum



Hastalloy



Stainless steel



PVC



2B999 Specific processing equipment, n.e.s., as follows (see List of Items Controlled).

License Requirements

Reason for Control: AT

Control(s)

AT applies to entire entry. A license is required for items controlled by this entry to North Korea for anti-terrorism reasons. The Commerce Country Chart is not designed to determine AT licensing requirements for this entry. See §742.19 of the EAR for additional information.

List Based License Exceptions (See Part 740 for a description of all license exceptions)

LVS: N/A

GBS: N/A

List of Items Controlled

Related Controls: (1) See also 1B233, 2A992, 2A993, 2B001.f, 2B004, 2B009, 2B104, 2B109, 2B204, 2B209, 2B228, 2B229, 2B231, and 2B350. (2) Certain

e. E-beam welders;

f. Monel equipment, including valves, piping, tanks and vessels;

g. 304 and 316 stainless steel valves, piping, tanks and vessels;

Note: ~~Fittings are considered part of~~ “piping” for purposes of 2B999.g.

h. Mining and drilling equipment, as follows:

h.1. Large boring equipment capable of drilling holes greater than two feet in diameter;

h.2. Large earth-moving equipment used in the mining industry;

i. Electroplating equipment designed for coating parts with nickel or aluminum;

j. Pumps designed for industrial service and for use with an electrical motor of 5 HP or greater;

k. Vacuum valves, piping, flanges, gaskets and related equipment “specially designed” for use in high-vacuum service, n.e.s.;

Violation #2

Shipped countless orders overseas classified with the wrong ECCN number EAR99 instead of 2B999.

Immediate Action

1. Immediately stopped shipping international orders until ECCN was confirmed by Equilibar staff AND attorney.
2. Ran reports in our ERP system and ACE to see how many filings were done with the incorrect ECCN.
3. Decided to include this mistake in our voluntary disclosure and add the U.S. Census Bureau as recipient.



Violation #3

Added estimated shipping charges from our location to point of deliver to ACE values instead of adding estimated shipping charges from our location to the port of export.

Immediate Action



August 19, 2021

via email and FedEx

Director, Office of Export Enforcement
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Ave.
Room H4514
Washington, DC 20230

Re: ECCN Classification and One-Time Shipment to Entity on Entity List
Voluntary Self-Disclosure
15 C.F.R. § 764.5

To Whom It May Concern:

We represent Equilibar Precision Fluid Control, LLC (Equilibar) of 320 Rutledge Road, Fletcher, North Carolina. Through an internal review, Equilibar has identified an export control classification issue and an export shipment to an end user that is on the Entity List without the required export license. Please consider this a Voluntary Self-

END USER / END USE DECLARATION

ALL LINES MUST BE FULLY ANSWERED FOR ALL PURCHASE ORDERS PRIOR TO ORDER RELEASE

As the exporter, Equilibar must ensure that all shipments are in accordance with the Export Administration Regulations (EAR) and other applicable export laws and regulations. Under these export laws and regulations, Equilibar must not ship products to certain individuals, foreign nationals or companies designated as "denied parties" or "restricted parties" by the U.S. and other government authorities, and must not ship products for certain end uses without the appropriate export licensing authorization. Any diversions, re-exports, or transfers contrary to U.S. law are also prohibited.

To maintain compliance with these export laws and regulations, Equilibar must collect and maintain the information requested below for every order and for each application ("use"). If your order is for the same application, please contact the Sales Department and request a blanket export compliance form. Equilibar will use such information solely to ensure compliance with applicable export laws and regulations. All information will be kept strictly confidential by Equilibar, except where required by law. If you have further questions, please contact Julie Detmering, Equilibar Export Compliance Manager, at 828-650-6590 or julie@equilibar.com or go to www.bis.doc.gov for further information.

ORDER INFORMATION	
Purchasing Company	
Contact Name	
Contact Email	
Contact Phone #	
Purchase Order #	

USER INFORMATION	
End User's Name	
End User's Company	
End User's Website	
Address where product will be used	
Street Address 1	
Street Address 2	
City	
State or Providence	
Postal Code	
Country	

END USE INFORMATION	
Will this be re-exported in the form it was received?	
No	If yes, list destination
What is the end user's primary business activity?	
How will the product be used?	
Will the items in this shipment be used in any non-commercial applications (e.g. military or nuclear)?	
No	If yes, list non-commercial applications below.

Declaration

We certify that the provided information is accurate and complete to the best of our knowledge. Further, if the above information changes (for example, items will be re-exported or transferred to a different End User or used for a different application), then we agree to provide Equilibar with written notification of the changes and a new End User / End Use Declaration. We recognize that any diversions, re-exports, or transfers contrary to U.S. law are prohibited.

We understand that we are also required to comply with the Equilibar, LLC. Standard Terms and Conditions of Quotation and Sale, including but not limited to, the requirement to comply with all applicable U.S. export and sanctions laws, regulations, orders, and requirements. By electronically signing this declaration, we certify that we have reviewed, understand and agree to abide by these terms and conditions that apply to quotations and sales.

Signature

Date (Day, written month, year: Example: 01 May 2000)

New End User / End Use form

- Better organized and worded
- Reflects better for all customers and not just international ones
- Fillable document
- Explanations why we request this information is included on the forms



Attorney suggestion form to help ensure all aspects of an order are reviewed prior to shipping.

Another check list form that is 5 pages long that keeps track of what documents or information needs to be kept on record.

EXPORT/AES FILING AUDIT WORKSHEET

ITN:			Filing Date:		
Commodity Description:					
Audit Issue (if any):					
Yes	No	N/A			
☐	☐	☐	1.0 Export Packet. Confirm the following documents are included and readable.		
☐	☐	☐	1.1 Export Control Documents:		
☐	☐	☐	1.1.1 AES Record		
☐	☐	☐	1.1.2 Export License(s)		
☐	☐	☐	1.1.3 License Application(s)		
☐	☐	☐	1.1.4 Licensing Supporting Documentation		
☐	☐	☐	1.1.5 Packing List/Bill of Lading/Air Waybill		
☐	☐	☐	1.1.6 Request(s), Report(s), and Other Restrictive Trade Practice/Boycott-Related Documents		
☐	☐	☐	1.1.7 Export Clearance Documents (See 15 C.F.R. Part 758)		
☐	☐	☐	1.1.8 Customs Form CBPF 7512 (If T&E or I.E. Shipment)		
☐	☐	☐	1.1.9 Participating Government Agency Documentation (PGA)		
☐	☐	☐	1.2 Transaction Documents:		
☐	☐	☐	1.2.1 Invitations to Bid		
☐	☐	☐	1.2.2 Contract(s)		
☐	☐	☐	1.2.3 Financial Records/Books of Account		
☐	☐	☐	1.2.4 Invoice(s)		
☐	☐	☐	1.3 General Documentation Related to the Export:		
☐	☐	☐	1.3.1 Memoranda		
☐	☐	☐	1.3.2 Notes		
☐	☐	☐	1.3.3 Correspondence		
☐	☐	☐	1.4 Jurisdiction/Classification Documentation:		
☐	☐	☐	1.4.1 Jurisdiction Opinion/Determination Request (BIS/DDTC)		
☐	☐	☐	1.4.2 Jurisdiction Opinion/Determination		
☐	☐	☐	1.4.3 Commodity Classification Request (BIS/DDTC)		
☐	☐	☐	1.4.4 Commodity Classification Determination		
☐	☐	☐	1.5 Is there any other documentation that this export should have but is		

EQUILIBAR EXPORT CONTROL FORM

1. Shipment Information

Sales Order No. _____ Customer PO No. _____
Destination Country: _____
Intermediate Country: _____

2. Product Information

ECCN(s): _____ Reason(s) for Control: _____
Is License Required to this Country? Yes ☐ No ☐

3. End Use/End User Information

End User: _____
End Use: _____

Is End Use or User Related to: Nuclear (including power generation), Chemical, Biological, Missile, Space, or Military? Yes ☐ No ☐ If Yes, Describe: _____

If Yes, is License Required? Yes ☐ No ☐ If No, Why Not? _____

4. Restricted Parties Screening

a. Ultimate Consignee:

Screened at: Customer Set-Up ☐ Order Entry ☐ Shipment ☐

b. End User:

Screened at: Customer Set-Up ☐ Order Entry ☐ Shipment ☐

c. Other Known Parties:

Name: _____ Role: _____
Name: _____ Role: _____
Screened at _____
Screening Results: Hit? Yes ☐ No ☐ If Yes, Which Party? _____
Which List? _____
How Resolved? _____

5. Records

Retained Records of Restricted Parties Screening, Export Compliance Form:
a. In hard copy shipment file? ☐
b. Electronically? ☐

6. Additional Explanation, if Necessary:

Signed _____ Printed Name _____ Date ____/____/____

Elevated to (if there is a question):
Signed _____ Printed Name _____ Date ____/____/____



INVESTIGATION



certified
Drama
Queen







CBP
FIELD OPERATIONS
FEDERAL OFFICER

PENALTY!

F
I
N
E

**TO ERR IS HUMAN.
TO FORGIVE IS
AGAINST COMPANY
POLICY.**



Thank You!



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elevate⁺ SUMMIT

For Women in
International Trade



Thank You!

| Stick around for some Q&A!

From Data to Direction:
Understanding the Latest
Middle Market Indicator
Report

 Tuesday, August 11 at **1pm EST!**



 **CE Code for Today's Webinar**

**1 LCB/CCS/CES credit available from
watching [the recording](#) until 7/14/2027**

