

## Voluntary Self-Disclosure Sample Letter

October 8, 2019

Ms. Lisa E. Donaldson  
Chief, Economic Management Division  
U.S. Census Bureau  
4600 Silver Hill Road, Room 6K064  
Washington, DC 20233-6700

Doe's Widgets, Inc. submits this voluntary self-disclosure with supporting documentation that describes suspected violations of the Foreign Trade Regulations (FTR). The following information is provided in accordance with Section 30.74(c)(3) of the FTR.

**1) The kind of violation involved, for example, failure to file EEI, failure to correct fatal errors, failure to file timely corrections;**

Doe Widgets, Inc. is a manufacturer of widgets and sells directly to foreign buyers all over the world. Recently, the company discovered that electronic export information (EEI) for five shipments ultimately destined to Munich, Germany, were filed incorrectly, and two shipments were not filed at all.

**2) Describe all data that was either not reported or reported incorrectly;**

Five shipments contained incorrect value and Schedule-B classification, and two shipments were not filed. Two shipments required DSP-5 licenses by the State Department.

As of September 27, 2018, Doe's Widgets, Inc. has updated each shipment to the correct value and Schedule- B classification and reported shipment information for the two shipments initially not reported. Please see shipment details in the tables provided in section "**vii. ITNs of the missed and/or corrected shipments.**"

**3) An explanation of when and how the violations occurred;**

A recent audit by Doe Widgets, Inc.'s trade compliance group, determined that EEI for five shipments were filed incorrectly. A new employee, who was entrusted with the responsibility of filing EEI to the AES for those shipments, miscalculated the value of each shipment and failed to inspect the items before choosing the Schedule-B numbers. In addition, the two shipments not filed were low value and the employee assumed they were No License Required (NLR); however, they were both licensed by the State Department.

**4) The complete identities and addresses of all individuals and entities, whether foreign or domestic, involved in the activities giving rise to the violations;**

**U.S. Principal Party in Interest:**

Doe's Widgets, Inc.  
1234 Wrong Way Road - Suite A  
Rochester, NY 14468  
(585) 555-5555  
[bdoe@doewidgets.com](mailto:bdoe@doewidgets.com)

**Foreign Principal Party in Interest & Ultimate Consignee:**

Schultz International Widgets Distributors, Inc.

Unterer Anger 99

98765 Munich, Germany

+49 68 12345678

[dschultz@siwdinc.com](mailto:dschultz@siwdinc.com)

**5) A description of any mitigating factors;**

Since the incident was discovered, the employee responsible for filing EEI in the AES has attended an AES Compliance Seminar to learn more about filing requirements associated with the FTR as well as how to properly report EEI in AESDirect.

**6) Corrective measures taken; and**

We have updated our employee manual to improve clarity on filing procedures. Additionally, we sent all trade compliance staff to the most recent AES Compliance Seminar hosted by the Regulations, Outreach and Education Branch of the Census Bureau. Staff participated in both the seminar and AES PcLink workshop.

**7) ITNs of the missed and/or corrected shipments.**

**Incorrectly filed shipments:**

See exhibit A on page 3.

**Shipments where EEI was not originally filed:**

See exhibit B on page 3.

**8) Was this violation disclosed to any other federal agency? If so, provide their response.**

Two of the shipments (ITNs: 20173641257953 and 20184321597692) required DSP-5 licenses and were disclosed to the State Department. The investigation by the State Department has since been closed. Please see attached response letter.

If the Census Bureau has questions regarding the content provided or requires additional information to complete this voluntary self-disclosure, please contact Doe's Widgets, Inc. Trade Compliance Director, Talia Smith at (555) 555-5554 or by e-mail [TSmith@SIWDinc.com](mailto:TSmith@SIWDinc.com).

Sincerely,



Doe's Widgets, Inc.

John Doe

President

1234 Wrong Way Road - Suite A

Rochester, NY 14468

## Exhibit A

Incorrectly filed shipments:

	( Original Data Element )	( Corrected Data Element )	( Original Data Element )	( Corrected Data Element )
<b>Internal Transaction Numbers</b>	<b>Original Value</b>	<b>Corrected Value</b>	<b>Original Schedule-B</b>	<b>Corrected Schedule-B</b>
20183654897617	\$ 6,321	\$ 7,124	6109.10.0004	6109.10.0007
20187754897715	\$ 78,549	\$ 79,000	6109.10.0027	6109.10.0042
20173661435556	\$ 54,214	\$ 45,000	6103.49.1500	6103.42.0000
20175127976686	\$ 124,654	\$ 32,154	6103.31.0000	6103.39.2000

## Exhibit B

Shipments where EEI was not originally filed:

<b>Internal Transaction Number of Shipment</b>
20173641257953
20184321597692