

Dec 27, 1978

113

BEFORE THE
DIRECTOR, BUREAU OF POLITICO-MILITARY AFFAIRS
DEPARTMENT OF STATE
WASHINGTON, D.C.

In the Matter of)
)
OLIN CORPORATION) No. MC 78-1
Respondent)

ORDER OF DEBARMENT
AND PROBATION
(CONSENT ORDER)

The Office of Munitions Control, having initiated debarment proceedings against respondent pursuant to 22 CFR Part 127 on September 25, 1978, based upon respondent's prior conviction for violations of section 414 of the Mutual Security Act of 1954, and

Respondent, having represented that it has taken corrective measures to prevent further violations, including termination of employment of individuals involved in the previous violations and the initiation of new practices and procedures; and having volunteered to grant full access by the Office of Munitions Control to records and personnel as may be desired to assess and verify the adequacy of these practices and procedures, and

The Parties, having consented to the disposition of these proceedings on the basis set forth below,

Now, therefore, it is hereby ORDERED as follows:

1. Respondent is debarred from all export privileges with

-2-

respect to articles and data on the United States Munitions List for which licenses are required, other than exports to foreign governments under direct procurement contracts, for a period of sixty days from and after the effective date of this Order.

2. Respondent is placed on probation during the remainder of the one year period following the effective date of this Order, after expiration of the above sixty day debarment. Subject to the provisions of 22 CFR 128.15, and upon notice, respondent shall be debarred as set forth in paragraph 1 for a further period of 120 days if during that period of probation:

(a) respondent commits a further violation of 22 U.S.C. 2778 or 22 U.S.C. 2779 or any regulation thereunder, or

(b) respondent fails to comply with any of the terms of this Order.

3. Respondent shall immediately grant full access by designated representatives of the Office of Munitions Control to records and personnel of respondent, and, to the extent of its capacity, shall facilitate such full and immediate access with respect to its agents and distributors, as may be desired by the Office of Munitions Control to assess and verify the adequacy of respondent's practices and procedures in avoiding and detecting violations of laws or regulations relating to export controls. Such access shall include, but shall not be limited to:

(a) compliance manuals and other materials developed by respondent;

- (b) operation of respondent's New Haven office and plant;
- (c) controls on respondent's overseas distribution of exports subject to the International Traffic in Arms Regulations; and
- (d) reports prepared by respondent's outside consultants.

4. During the thirty day period preceding the expiration of one year after the effective date of this Order, respondent shall provide to designated representatives of the Office of Munitions Control such further access to records and personnel, as described above, as may be desired by the Office of Munitions Control to assess and verify the continued adequacy of respondent's practices and procedures.

5. Respondent shall promptly remedy any deficiencies in its practices and procedures as may be found necessary by the Office of Munitions Control to assure the avoidance and detection of such violations.

I consent to this Order for the Office of Munitions Control.

William B. Robinson
 William B. Robinson, Director

I consent to this Order for the respondent.

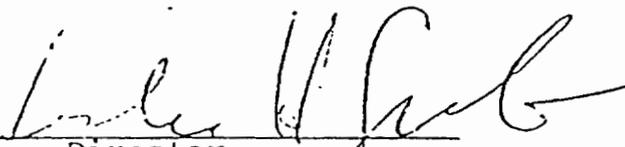
Phil H. Richey
 Phil H. Richey
 President, Winchester Group

I approve this Order and recommend its adoption.

[Handwritten signature]

116

Adopted and made effective from and after this 27th
day of December, 1978.



Director
Bureau of Politico-Military Affairs