

U.S. Nuclear Regulatory Commission  
ATTN: Director, Office of Enforcement  
U.S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike, Rockville, MD 20852-2738

Reply to a Notice of Violation ; IA-18-048

Dear Mr. Wilson,

In response to the NRC investigative report, I wish to respond to the following-

**1) Reason for Violation**

During my tenure at Solis Tek Inc. as the General Manager I was tasked with many aspects of the operation. My job responsibilities expanded wherever and whenever there was a need. When it was discovered that Solis Tek was required to apply for the radiation licenses "upper management"- (which consisted of the executive officers) gave me this task. There was no incentive for me taking on this role other than this being an absolute need with a "Get it done" request. I have had no previous experience but began to research what was required.

Per the license requirements, I took an online safety course to become the RSO and created the Radiation Safety Guide, which was reviewed and signed off by upper management before submittal.

During this time from March 2015-February 2017, subsequent letters were sent to Solis Tek further explaining the need and urgency for an NRC license, including a letter specifically stating the need to stop and desist of distribution before the application was completed. Each letter was again sent to the executive management team and further discussed internally.

As the General Manager, I expressed my concern to upper management multiple times. I made clear to my colleagues, which included the Logistic Coordinator, West Coast General Manager, Sales Manager, and Regional Sales Representatives that this was not right. We were well aware of the situation present. Upper management placed the importance of sales and profits over regulatory compliance. Upper management never instructed us to stop distribution knowing what was stated in the letters. I did not willingly choose to continue distribution. My statement during the interview of where I said, "I chose not to immediately stop distribution in order to provide a period of time to inform Solis Tek's customers that shipments were going to stop" was instructed of me to say by the Compliance Officer. This was an attempt to delay the application process.

I would like to clarify that I had no intention of disregarding the letters sent by the NRC. As an employee I acted collectively and I did not have the authority to deliberately continue to distribute grow lamps without possession of the distribution license. It was a failure of upper management to identify the importance and comply with the requirements of all rules and regulations.

**2) Corrective Actions**

In order to facilitate in the application process I contacted a third party consultant. With their help, Solis Tek was able to properly apply for the required distribution license.

As of May 2018, I have left Solis Tek due to the reduction in force and the closing of the New Jersey facility. I have no plans of returning to this role or any involving radiation licensing in the future.

**3) Date when full compliance was achieved**

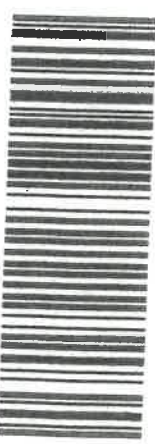
Successful completion of the distribution license concluded June 2017.

Thank you,

A handwritten signature in black ink, appearing to be 'Simon Siu', with a long horizontal flourish extending to the right.

Simon Siu

Address Redacted



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