

Bureau of Industry and Security

Antiboycott Warning Letters

1998

2000

2001

2002

2003



WARNING LETTER

Reference No: 98/D031/NR

23 December 1998

Pillowtex Corporation
4111 Mint Way
Dallas, TX 75237.1605

R e : Case No. 93-30

Gentlemen/Ladies:

We have reason to believe that you have violated Section 769.6 of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (1998), (the "Regulations"). As a person required by this section of the Regulations to report to this Department receipt of requests to engage in restrictive trade practices or boycotts (boycott requests), you have received such requests which you failed' to report (See attached Table A).

It is important that you comply with these Regulations in the future and that you report to this Department in a timely manner your receipt of boycott requests. Failure to do so could result in the imposition against you of a civil penalty and/or any of the other sanctions set forth in Section 764.3 of the Regulations.

This investigation is being closed with the issuance of **this** warning letter. This warning letter applies only to the transactions referred to herein. If we become aware of other violations of the Regulations, such violations may result in the institution of administrative proceedings against you.

Warning letters are made available for public inspection and copying in the Bureau of Export Administration Freedom of Information Records Inspection facility, Room 4525, Washington, DC 20230, thirty (30) calendar days after mailing. Any comments, response or

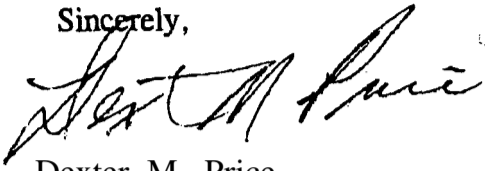
¹ The alleged violations occurred in 1991. **The** Regulations governing the alleged violations at issue are found in the 1991 versions of the Code of Federal Regulations (15 C.F.R. Parts 768-799 (1991)).



explanation you wish to make with respect to this matter will also be made available to the public for inspection and copying.

Should you have any questions or comments or need additional assistance, please contact me at (202) 482-5914.

Sincerely,

A handwritten signature in black ink, appearing to read "Dexter M. Price". The signature is written in a cursive style with a large initial "D".

Dexter M. Price

Director

Office of Antiboycott Compliance

TABLE A

Schedule of Alleged Violations of 5769.6
Failure's to Report Receipt of Boycott Requests

Pillowtex Corporation, Case No. 93-30

Boycotting Country	Reference	Date Received	Boycott Language
U.A.E.	ADIB Purchase Order	02.28.91	A separate certificate from the manufacturers of processors certifying that the goods are neither of Israeli origin nor do they contain Israeli material.....
U.A.E.	BCCI L/C#410866.91	03.07.91	A certificate from the Shipping Co., or their agents stating that the vessel is allowed by Arab authorities to call at Arabian ports.....



WARNING LETTER

RETURN RECEIPT REQUESTED

FEB 20 2000

Union Bank of California
400 California Street
San Francisco, CA 94104

Attention: Anthony Zeind, Vice President

Case No. 99-11

Gentlemen:

As we discussed following our examination of a number of Union Bank of California (UBC)'s export letters of credit in October of 1999, we have reason to believe that UBC violated Section 760.6 of the Export Administration Regulations' in the handling of one letter of credit received in June, 1999, from the Oman International Bank SAOG, your reference 3 15E406504

As a person required by Section 760.6 of the Regulations to report to this Department receipt of requests to engage in restrictive trade practices or boycotts, UBC failed to report the following request contained in the letter of credit:

“CERTIFICATE ISSUED BY THE SHIPPING COMPANY OR THEIR
APPOINTED AGENTS, CONFIRMING THAT THE CARRYING VESSEL
IS:..

NOT BANNED ENTRY TO THE PORTS OF THE SULTANATE
OF OMAN FOR ANY REASON WHATSOEVER UNDER THE LAWS
AND REGULATIONS OF THE COUNTRY.”

It is important to comply with these Regulations in the future and report to this Department in a timely manner your receipt of boycott and restrictive trade practice requests. Failure to do so could result in the imposition against UBC of a civil penalty and/or any of the other sanctions set forth in Section 787.1 of the Regulations.

This investigation is being closed with the issuance of this warning letter. This warning letter applies only to the transactions referred to herein. If we become aware of other violations of the Regulations, such violations may result in the institution of administrative proceedings against UBC.

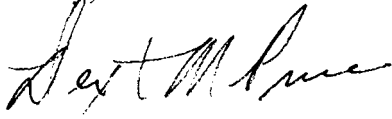
¹ The Regulations governing the alleged violations at issue are found in the 1999 version of the Code of Federal Regulations (15 C.F.R. Parts 768-799 (1999)).



Warning letters are made available for public inspection and copying in the Bureau of Export Administration Freedom of Information Records Inspection facility, Room 4525, Washington, D.C. 20230, thirty calendar days after mailing. Any comments, response or explanation you wish to make with respect to this matter will also be made available to the public for inspection and copying.

Should you have any questions or comments or need additional assistance, please contact me at 202 482-238 1.

Sincerely,

A handwritten signature in black ink, appearing to read "Dexter M. Price". The signature is written in a cursive style with a large initial 'D'.

Dexter M. Price
Director
Office of Antiboycott Compliance

WARNING LETTER

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

DEC 29 2000

Bank of New York
10 1 Barclay Street,
8 East
New York, New York

Attention: Mr. George M. Krol

Gentlemen/Ladies:

Re: Case No. 00-01

We have reason to believe that you have violated Section 760.5 and Section 760.2(d) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2000)) (the "Regulations")¹. As a person required by Section 760.5 of the Regulations to report to this Department receipt of boycott and restrictive trade practice requests, you have received such a request which you failed to report. Additionally, you have furnished information about whether another person has a business relationship with a person known or believed to be restricted from having any business relationship with or in a boycotting country, as prohibited by Section 760.2(d). (See attached Table of Alleged Violations)

It is important to comply with these Regulations in the **future** and report to this Department in a timely manner your receipt of boycott and restrictive trade practice requests and to refrain from furnishing prohibited information. Failure to do so could result in the imposition against you of a civil penalty and/or any of the other sanctions set forth in Section 764.3 of the Regulations and Section 787.1 of the former Regulations.

This investigation is being closed with the issuance of this warning letter. This warning letter applies only to the transactions referred to herein. If we become aware of other violations of the Regulations, including any which occurred during the same time period as the violations referred to in this warning letter, such violations may result in the institution of administrative proceedings against you.

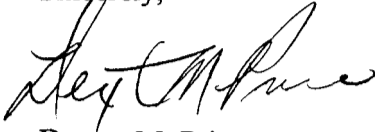
Warning letters are made available for public inspection and copying in the Bureau of Export Administration Freedom of Information Records Inspection facility, Room 4525, Washington, DC 20230, thirty (30) calendar days after mailing. Any comments, response or explanation you wish

¹ The Regulations governing the alleged violations at issue are found in the 1998 version of the Code of Federal Regulations (15 C.F.R Parts 768-799 (1998)).

to make with respect to this matter will also be made available to the public for inspection and copying.

Should you have any questions or comments or need additional assistance, please contact me at (202) 482-2381.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dexter M. Price".

Dexter M. Price
Director
Office of Antiboycott Compliance

TABLE A

Schedule of Alleged Violations of § 769.6
Failures to Report Receipt of Boycott Requests

Bank of New York, Case No. 00-01

BOYCOTTING COUNTRY	REFERENCE NUMBER	DATE RECEIVED	BOYCOTT LANGUAGE
Kuwait	Burgan Bank L/C No. 98200329169- 3929	5/5/98	A.
U.A.E.	InchcapeShipping Services Certificate Forwarded for Reimbursement of Abu Dhabi Commercial Bank L/C No. LC0798 175	11/10/98	B.

A. "Goods must not be of Israeli origin."

B. "**SHIP** IS ALLOWED BY ARAB AUTHORITIES TO CALL AT ARABIAN PORTS . .
.. SIGNATURE: . . . AS AGENTS'



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Export Administration
Washington, D.C. 20230

WARNING LETTER

Reference: 01/C001/NR

RETURN RECEIPT REQUESTED

AUG 16 2001

Standard Chartered Bank
7 World Trade Center
New York, N.Y. 10048

Attention: Rosie Boucos
Compliance Director

Case No. 01-01

Dear Ms. Boucos:

Following our examination of a number of Standard Chartered Bank's export letters of credit in New York in January of this year, we have reason to believe that Standard Chartered violated Section 760.5 of the Export Administration Regulations' in the handling of one **letter** of credit received in January, 1999 from Standard **Chartered** Bank in Oman, your reference E9706354.

As a person required by Section 760.5 of the Regulations to report to this Department receipt of requests to engage in restrictive trade practices or boycotts, Standard Chartered Bank in New York failed to report the following request contained in the **letter** of credit:

“CERTIFICATE ISSUED BY THE SHIPPING COMPANY OR THEIR
AGENTS, CONFIRMING THAT THE CARRYING VESSEL
IS ALLOWED TO ENTER THE PORTS OF ARAB STATES”

It is important to comply with these Regulations in the **future** and report to this Department in a timely manner your receipt of boycott and restrictive trade practice requests. Failure to do so could result in the imposition against Standard Chartered Bank of a civil penalty and/or any of the other sanctions set forth in Section 787.1 of the Regulations.

This investigation is being closed with the issuance of this warning letter. This warning letter applies only to the transactions referred to herein. If we become aware of other violations of the Regulations, such violations may result in the institution of administrative proceedings against Standard Chartered Bank.

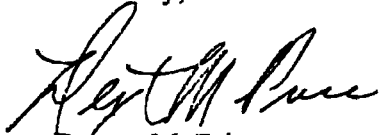
¹ The Regulations governing the alleged violations at issue are found in the 1999 version of the **Code** of Federal Regulations (15 C.F.R. Parts 768-799 (1999)).



Warning letters are made available for public inspection and copying in the Bureau of Export Administration Freedom of Information Records Inspection facility, Room 4525, Washington, D.C. 20230, thirty calendar days after mailing. Any comments, response or explanation you wish to make with respect to this matter will also be made available to the public for inspection and copying.

Should you have any questions or comments or need additional assistance, please contact me at 202 482-23 8 1.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dexter M. Price".

Dexter M. Price

Director

Office of Antiboycott Compliance



UNITED STATES DEPARTMENT OF COMMERCE
The Assistant Secretary for Export Administration
Washington, DC. 20230

Reference No. 01/C002/NR

WARNING LETTER

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

SEP 5 2001

Definitive Technology LLP
11433 Cronridge Drive
Owings Mills, Maryland 2 1117

Attention: Mr. David E. Peet

Gentlemen/Ladies:

Re: Case No. 01-05

We have reason to believe that you have violated Section 760.5 and Section 760.2(d) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2000)) (the "Regulations").¹ As a person required by Section 760.5 of the Regulations to report to this Department receipt of boycott and restrictive trade practice requests, you have received such a request which you failed to report. Additionally, you have furnished information about whether another person has a business relationship with a person known or believed to be restricted from having any business relationship with or in a boycotting country, as prohibited by Section 760.2(d). (See attached Table of Alleged Violations)

It is important to comply with these Regulations in the future and report to this Department in a timely manner your receipt of boycott and restrictive trade practice requests and to refrain from furnishing prohibited information. Failure to do so could result in the imposition against you of a civil penalty and/or any of the other sanctions set forth in Section 764.3 of the Regulations and Section 787.1 of the former Regulations.

This investigation is being closed with the issuance of this warning letter. This warning letter applies only to the transactions referred to herein. If we become aware of other violations of the Regulations, including any which occurred during the same time period as the violations referred to in this warning letter, such violations may result in the institution of administrative proceedings against you.

Warning letters are made available for public inspection and copying in the Bureau of Export Administration Freedom of Information Records Inspection facility, Room 688 1, Washington, DC 20230, thirty (30) calendar days after mailing. Any comments, response or explanation you wish

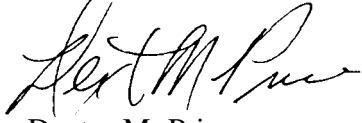
¹ The Regulations governing the alleged violations at issue are found in the 1999 version of the Code of Federal Regulations (15 C.F.R. Parts 768-799 (1999)).



to make with respect to this matter will also be made available to the public for inspection and copying.

Should you have any questions or comments or need additional assistance, please contact me at (202) 482-2381.

Sincerely,

A handwritten signature in black ink, appearing to read "Dexter M. Price". The signature is written in a cursive style with a large initial "D" and "P".

Dexter M. Price
Director
Office of Antiboycott Compliance



WARNING LETTER

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

MAR 13 2002

Kessler International Corporation
15946 Derwood Road
Rockville, Maryland 20855

Attention: Mr. **Vince Wadhvani**

Gentlemen/Ladies:

Re: Case No. 02-02

We have reason to believe that you have violated Section 760.5 of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2000)) (the "Regulations")¹. As a person required by Section 760.5 of the Regulations to report to this Department receipt of boycott and restrictive trade practice requests, you have received such a request which you **failed** to report. (See attachment Alleged Violation of § 760.5)

It is important to comply with these Regulations in the **future** and report to this Department in a timely manner your receipt of boycott and restrictive trade practice requests and to refrain from **furnishing** prohibited information. Failure to do so could result in the imposition against you of a civil penalty and/or any of the other sanctions set forth in Section 764.3 of the Regulations and Section 787.1 of the former Regulations.

This investigation is being dosed with the issuance of this warning letter. This warning letter applies only to the transactions referred to herein. If we become aware of other violations of the Regulations, including any which occurred during the same time period as the violations referred to in this warning letter, such violations may result in the institution of administrative proceedings against you.

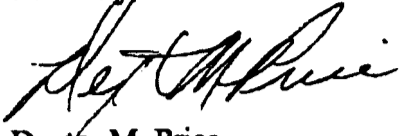
Warning letters are made available for public inspection and copying in the Bureau of Export Administration Freedom of Information Records Inspection facility, Room 688 1, Washington, DC 20230, thirty (30) calendar days after mailing. Any comments, response or explanation you wish to make with respect to this matter **will** also be made available to the public for inspection and copying.

¹ The Regulations governing the alleged violations at issue are found in the 2000 version of the Code of Federal Regulations (15 C.F.R. Parts 768-799 (2000)).



Should you have any questions or comments or need additional assistance, please contact me at (202) 482-2381.

Sincerely,

A handwritten signature in black ink, appearing to read "Dexter M. Price". The signature is written in a cursive style with a large initial "D".

Dexter M. Price
Director
Office of Antiboycott Compliance

Alleged Violation of § 760.5
Failure to Report Receipt of Boycott Request

Case No. 02-02

BOYCOTTING COUNTRY	REFERENCE NUMBER	DATE RECEIVED	BOYCOTT LANGUAGE
Syria	Syrian Railways "ANNOUNCE- MENT FOR TENDER" NO 24/2000	8/11/2000	*

*

...

1. Our Company should have neither branch of industrialization nor assembly in Israel.
2. We have given no rights of industrialization and assembling to a company or individual in Israel.
3. No representative or lead office of our company in the Middle East should be located in Israel.
4. No investment in any Israel companies or factories is allowed.
5. No rights to use our company's name are given to any Israeli individual or companies.
6. Our company should take no part in financial and/or technical assistance to the **Israeli** factories.
7. Our company should take no part in selling or advertising any Israeli products.
- 8.. Non [sic] of our company's responsible should be in the combined Israeli Chamber of Commerce.



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Industry and Security
Washington, D.C. 20230

WARNING LETTER

JUL 22 2002

Tesa Tape, Inc.
5825 Carnegie Boulevard
Charlotte, NC 28209

Case No. 99-5

Gentlemen/Ladies:

The Bureau of Industry and Security, United States Department of Commerce ("BIS")¹, has reason to believe that Tesa Tape, Inc., a division of the German Beiersdorf Group of companies, violated Section 760.5 of the Export Administration Regulations (15 C.F.R. Parts 730-774 (2002)) (the "Regulations"), issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (1994 & Supp. V 1999))² (the "Act") in that from May 1997 to July 1998, Tesa Tape, Inc. failed to report receipt of requests to engage in restrictive trade practices or boycotts as required by Section 760.5 of the Regulations.

It is important that you comply with these Regulations in the future. Failure to do so could result in the imposition against you of a civil penalty and/or other sanctions set forth in §764.3 of the

¹ On April 18, 2002, the Department of Commerce announced that the name of the Bureau of Export Administration ("BXA") had been changed to the Bureau of Industry and Security ("BIS") and made conforming changes in the Export Administration Regulations. *Fed. Reg.* 20630-32 (April 26, 2002). This change does not affect the substantive activities or responsibilities of BIS. All actions taken before or after April 18th under the name of BXA will be deemed to have taken under the name BIS and all references to BXA are deemed to be to BIS. *Id.*

² From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential notices, the last of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations then in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1706 (1994 & Supp. V 1999)) ("IEEPA"). On November 13, 2000, the Act was reauthorized by Pub. Law No. 106-508 and it remained in effect through August 20, 2001. Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (66 *Fed. Reg.* 44025 (August 22, 2001)), has continued the Regulations in effect under IEEPA. The Act and Regulations are available on the Government Printing Office website at: <http://w3.access.gpo.gov/bxa/>.



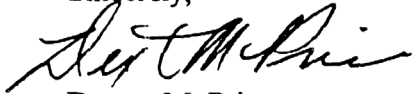
Regulations, including referral of the matter to the United States Department of Justice for consideration of criminal prosecution.

This investigation is being closed with the issuance of this warning letter. This warning letter applies only to the transactions referred to herein. Other violations of the Regulations not expressly referred to in this warning letter may result in the institution of administrative proceedings against you.

Warning letters are made available for public inspection and copying in the Freedom of Information Records Inspection Facility, Room 6881, U.S. Department of Commerce, Washington, D.C. 20230, thirty (30) calendar days after mailing. Any comment, response or explanation you wish to make with respect to this matter will also be made available to the public for inspection and copying.

Should you have any questions or comments relating to this warning letter, please contact me at (202) 482-5914.

Sincerely,

A handwritten signature in black ink, appearing to read "Dexter M. Price". The signature is written in a cursive style with a large initial "D".

Dexter M. Price

Director

Office of Antiboycott Compliance



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Industry and Security
Washington, D.C. 20230

AUG 1 2002

WARNING LETTER

Glenayre Electronics Inc.
5935 Carnegie Blvd.
Suite 300
Charlotte, NC 28209

Case No. 01-06

Attention: Bert Klein
Senior Vice President and
Chief Financial Officer

Gentlemen/Ladies:

The Bureau of Industry and Security, United States Department of Commerce (“BIS”), has reason to believe that Glenayre Electronics, Inc., violated Section 760.5 of the Export Administration Regulations (15 C.F.R. Parts 730-774 (2002)) (the “Regulations”), issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (1994 & Supp. V 1999))² (the “Act”) in that from August 1997 to April 2000, Glenayre Electronics failed to report receipt of requests to engage in restrictive trade practices or boycotts as required by Section 760.5 of the Regulations.

It is important that you comply with these Regulations in the future. Failure to do so could result in the imposition against you of a civil penalty and/or other sanctions set forth in § 764.3 of the

On April 18, 2002, the Department of Commerce announced that the name of the Bureau of Export Administration (“BXA”) had been changed to the Bureau of Industry and Security (“BIS”) and made conforming changes in the Export Administration Regulations. *Fed. Reg.* 20630-32 (April 26, 2002). This change does not affect the substantive activities or responsibilities of BIS. All actions taken before or after April 18th under the name of BXA will be deemed to have taken under the name BIS and all references to BXA are deemed to be to BIS.

² From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential notices, the last of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations then in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1706 (1994 & Supp. V 1999)) (“IEEPA”). On November 13, 2000, the Act was reauthorized by Pub. Law No. 106-508 and it remained in effect through August 20, 2001. Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (66 *Fed. Reg.* 44025 (August 22, 2001)), has continued the Regulations in effect under IEEPA. The Act and Regulations are available on the Government Printing Office website at: <http://w3.access.gpo.gov/bxa/>.




Regulations, including referral of the matter to the United States Department of Justice for consideration of criminal prosecution.

This investigation is being closed with the issuance of this warning letter. This warning letter applies only to the transactions referred to herein. Other violations of the Regulations not expressly referred to in this warning letter may result in the institution of administrative proceedings against you.

Warning letters are made available for public inspection and copying in the Freedom of Information Records Inspection Facility, Room 688 1, U. S. Department of Commerce, Washington, D.C. 20230, thirty (30) calendar days after mailing. Any comment, response or explanation you wish to make with respect to this matter will also be made available to the public for inspection and copying.

Should you have any questions or comments relating to this warning letter, please contact me at (202) 482-5914.

Sincerely,

A handwritten signature in black ink, appearing to read "Dexter M. Price". The signature is written in a cursive style with a large initial "D".

Dexter M. Price

Director

Offic of Antiboycott Compliance



WARNING LETTER

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

OCT 24 2002

Heinzel Import Export Inc.
220 East 42nd Street
Suite 3010
New York, New York 100 17

Gentlemen/Ladies:

Re: Heinzel Import Export
Case No. 97-10

We have reason to believe that you have violated Section 769.6 of the Export Administration Regulations (currently codified at 15 C.F.R. Parts **730-774** (2002)) (the 'Regulations') issued pursuant to the Export Administration Act of 1979, as amended (**50 U.S.C. app. §§ 2401-2420** (1994 & Supp. V 1999)) (the "Act").¹ As a person required by this section of the Regulations to report to this Department receipt of boycott and restrictive trade practice requests, you have received such requests which you failed to report. (See attachment Alleged Violations of § 769.6.)

It is important that you comply with these Regulations in the future and report to this Department in a timely manner your receipt of **boycott** and restrictive trade practice requests. Failure to do so

¹ The **alleged** violations occurred in 1993, 1994, and 1995. The Regulations governing the alleged violations at issue are found in the 1993, 1994, and 1995 versions of the Code of Federal Regulations (15 C.F.R. Parts 768-799 (1993, 1994, and 1995)). Those Regulations **define** the violations that we allege occurred and are referred to hereinafter **as** the former Regulations. Since that time, **the** Regulations have been reorganized and restructured; **the** restructured Regulations, codified at 15 C.F.R. Parts 730-774, established the procedures that apply to the matter in this letter.

² From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential Notices, the most recent of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. Sections 1701 - 1706 (1994 & Supp. V 1999)) (**IEEPA**). On November 12, 2000, the Act was reauthorized and remained in effect through August 20, 2001. Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), has continued the Regulations in effect under **IEEPA**.



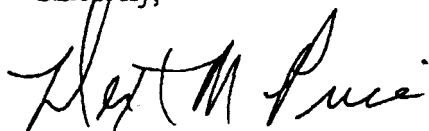
could result in the imposition against you of a civil penalty and/or any of the other sanctions set forth in Section 764.3 of the Regulations.

This investigation is being closed with the issuance of **this** warning letter. This warning letter applies only to the transactions referred to herein. If we become aware of other violations of the Regulations, such violations may result in the institution of administrative proceedings against you.

Warning letters are made available for public inspection and copying in the Bureau of Export Administration Freedom of Information Records Inspection facility, Room 6881, Washington, DC 20230, thirty (30) calendar days **after** mailing. Any comments, response or explanation you wish to make with respect to this matter will also be made available to the public for inspection and **copying**.

Should you have any questions or comments or need additional assistance, please contact me at (202) 482-2381.

Sincerely,

A handwritten signature in black ink, appearing to read "Dexter M. Price". The signature is written in a cursive style with a large initial "D".

Dexter M. Price

Director

Office of Antiboycott Compliance

Alleged Violations of § 769.6
Failure to Report Receipt of Boycott Request

Heinzel Import Export, Case No. 97-10

Item	L/C No	Date Request Received (on or About)	Boycotting Country	Code to Reportable Request */
01.	United Bank Limited UC No. Shj/3641/93	7/28/93	UAE	A
02.	Bank of Muscat L/C No. 08297	6/30/93	Oman	B
03.	Arab National Bank L/C No. 930830IM900T o c	8/31/93	Saudi Arabia	C
04.	Jordan Kuwait Bank L/C No. 029CSD23794	2/25/94	Jordan	D
05.	United Bank Limited UC No. DM/6797/95	2/16/95	UAE	E

Code to reportable requests:

- A. "A certificate in duplicate from the Shipping Company or its agents stating that the vessel is allowed by Arab authorities to call at Arabian ports and is not scheduled to call at any Israeli port during its trip to Arabian countries and is covered by Institute classification clause."
- B. "CERTIFICATE FROM THE SHIPPING COMPANY/AGENT THAT THE SHIP CARRYING THE OODS [sic] IS ALLOWED TO ENTER MINA QABOOS. MUTTRAH/DUBAI"
- C. IN CASE SHIPMENT NOT EFFECTED BY NATIONAL SHIPPING CO. OF SAUDI ARABIA (NSCSA) OR BY UNITED ARAB SHIPPING CO. (SAG), APPENDED

DECLARATION TO BILL(S) OF LADING WITH THE FOLLOWING TEXT MUST BE ACCOMPANIED WITH THE REQUIRED DOCUMENTS.

QUOTE

APPENDED DECLARATION TO BILL OF LADING

1. NAME OF VESSEL PREVIOUS NAME
2. NATIONALITY OF VESSEL . ,
3. OWNER OF VESSEL
4. VESSEL WILL CALL THE FOLLOWING PORTS
ENROUTE TO SAUDI ARABIA
1.... 2.... 3.... 4.... 5.... 6....

THE UNDERSIGNED ACCORDINGLY DECLARES THAT THE OWNER OR THE CAPTAIN OF THE ABOVE NAMED VESSEL IS NOT REGISTERED OR OWNED BY OTHER PERSONS OR COMPANIES THAN THE MENTIONED ABOVE AND IT SHALL NOT CALL OR ANCHOR ON ANY **OTHER** PORTS THAN THE ABOVE MENTIONED **ENROUTE** TO SAUDI ARABIA.

WRITTEN ON THE , DAY OF 199

SWORN TO BEFORE ME, ON THE... DAY OF199

AT ,

NOTARY OR SAUDI CONSULATE

SEAL AND SIGNATURE

SIGNATURE OF VESSEL'S OWNER

COMPANY OR AGENT

UNQUOTE.

- D. "A CERTIFICATE ISSUED BY VESSEL OWNER/AGENTS/CAPTAIN MUST STATE THAT THE CARRYING VESSEL IS NOT PROHIBITED FROM ENTRY TO JORDANIAN PORTS ACCORDING TO JORDAN LAWS AND REGULATIONS (SUCH CERTIFICATE SHALL NOT BE REQUIRED IF GOODS ARE SHIPPED ON A VESSEL SAILING UNDER AN ARAB FLAG AND REGISTERED IN AN **ARAB** COUNTRY)."
- E. "A certificate in duplicate from the shipping Company or its agents stating that the ship is allowed by Arab Authorities to call at Arabian ports and ~~is not scheduled to call at any Israeli port~~ during its trip to Arabian countries. This certificate is not required if shipment effected through UASC lines Vessels"



Warning Letter

17 September 2003

Bank One, N.A.
1717 Main Street, 11th Floor
Dallas, TX 75201

Case No 03-02

Attention : Mirella Coleman, VP
Trade Services Risk Manager

Gentlemen/Ladies:

We, the Office of Antiboycott Compliance (“OAC”), Bureau of Industry and Security, United States Department of Commerce (“BIS”), find that the facts described in Table A (attached) support a potential violation by you, Bank One, N.A. (Dallas), of Section 760.2(d) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2003)) (the “Regulations”), which are issued under the authority of the Export Administration Act of 1979, as amended (50 U.S.C. §§ 2401-2420 (1994 & Supp. V 1999)) (the “Act”),¹ in that, you furnished information about another person’s business relationships with another person who is known or believed to be restricted from having any business relationships with or in a boycotting country (see attached Table A).

Such violation can result in the imposition against you of a civil penalty and/or any of the other sanctions set forth in Section 764.3 of the Regulations, including referral of the matter to the United States Department of Justice for consideration of criminal prosecution. However, having considered all the facts and circumstances known to us at this time, including specifically the fact that you discovered this violation yourself and voluntarily disclosed it to us, we are closing this investigation with the issuance of this Warning Letter.

¹ From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential Notices, the most recent of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1706 (2000)) (“IEEPA”). On November 13, 2000, the Act was reauthorized by Pub. L. No. 106-508, and remained in effect through August 20, 2001. Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222, extended by a Presidential Notice of August 14, 2002 (67 *Fed. Reg.* 159 (August 16, 2002)), has continued the Regulations in effect under IEEPA.



It is important that you comply with these Regulations in the future. This Warning Letter applies only to the transaction referred to herein. Other violations of the Regulations not expressly referred to in this Warning Letter may result in the institution of administrative proceedings against you.

Warning Letters are made available for public inspection and copying in the Freedom of Information Records Inspection Facility, Room 6881, U.S. Department of Commerce, Washington, D.C. 20230, thirty calendar days after mailing. Any comment, response or explanation you wish to make with respect to this matter will also be made available to the public for inspection and copying.

Should you have any questions or comments relating to this Warning Letter, please contact me at (202) 482-5914.

Sincerely,

A handwritten signature in black ink, appearing to read "Dexter M. Price". The signature is fluid and cursive, with a long horizontal stroke at the end.

Dexter M. Price
Director
Office of Antiboycott Compliance

Table A

**Alleged Violation of § 760.2(d)
Furnishing Prohibited Information**

Bank One, N.A. (Dallas), Case No 03-02

Boycotting Country	Reference	Document Furnished	Date Furnished	Boycott Language
Lebanon	Byblos Bank L/C # 0310A66068.485	Bill of Lading	03.19.03	THE SHIPPING VESSEL IS AUTHORIZED TO ENTER IN LEBANESE PORTS. MAERSK INC AS AGENTS FOR THE CARRIER