



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

WARNING LETTER

Ref: 2008/DO01/RF
September 30, 2008

George Pasayan
District Manager
Aries Global Logistics, Inc.
747 Virginia Avenue
Suite 200
Hapeville, Georgia 30345

Case No. 07-07

Dear Mr. Pasayan:

We, the Office of Anitboycott Compliance, Bureau of Industry and Security, United States Department of Commerce ("BIS"), following our examination of certain export transactions of Aries Global Logistics, Inc. ("AGL"), have reason to believe that you, AGL, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2008))(the "Regulations"),¹ which are issued under the authority of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000))(the "Act"),² in that, on one occasion, you failed to report to the Department of Commerce ("Department") your receipt of a request to engage in a restrictive trade practice or boycott, as required by the Regulations.

Specifically, on or about September 29, 2004 in connection with the sale and/or transfer of goods or services (including information) from the United States to the United Arab Emirates, you received a request to furnish information concerning your or another person's business relationships with another person known or believed to be restricted from having any business relationship with or in a boycotting country. The request read as follows:

CERTIFICATE ISSUED BY THE CARRIER/MASTER OR
THEIR AGENT CERTIFYING THAT THE CARRYING
VESSEL/AIRLINE IS ALLOWED BY ARAB AUTHORITIES
TO CALL AT ARABIAN PORTS/AIRPORTS AND IS NOT
SCHEDULED TO CALL AT ANY ISRAELI PORT/AIRPORT
DURING ITS VOYAGE TO THE UNITED ARAB EMIRATES.

¹The alleged violation occurred during the year 2004. The Regulations governing the violation at issue are found in the 2004 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2004)).

²Since 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)), which has been extended by successive Presidential Notices, the most recent of which was July 23, 2008 (73 Fed. Reg. 43603 (July 25, 2008)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1706 (2000)).



Section 760.5 of the Regulations requires United States persons to report to the Department their receipts of such requests. You failed to report to the Department your receipt of this request.

All U.S. persons are required to comply with the Regulations. However, having considered all the facts and circumstances known to us at this time, including the results of our examination of AGL's export transactions, we are closing this investigation with the issuance of this Warning Letter.

This warning letter applies only to the transaction(s) 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 which could result in the imposition of civil penalties and/or any of the other sanctions set forth in Section 764.3 of the Regulations. You should, therefore, ensure that AGL strictly adheres to the Regulations in all future transactions.

Warning Letters are made available for public inspection in the Freedom of Information Reading Room section displayed on the Bureau of Industry and Security web site, at <http://efoia.bis.doc.gov>.

Should you have any questions or comments relating to this Warning Letter, please contact me at (202) 482-2381.

Sincerely,

A handwritten signature in black ink that reads "E.O. Weant III". The signature is written in a cursive style with a horizontal line underlining the name.

Edward O. Weant, III
Director
Office of Antiboycott Compliance



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

WARNING LETTER

Ref: 2008/D003/FI/GB

September 30, 2008

Koch Chemical Technology Group Ltd.
C/O Koch Chemical Technology Group LLC
4111 East 37th Street North
Wichita, KA 67220

Attention: Bradley E. Haddock
Vice President, General Counsel & Secretary

Case No. 07-01

Dear Mr. Haddock:

We, the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce ("BIS"), following our examination of a certain export transaction of Koch Chemical Group Ltd. ("Koch Ltd."), have reason to believe that you, Koch Chemical Group Ltd., have violated Section 760.2(d) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2008)) (the "Regulations"),¹ which are issued under the authority of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (the "Act"),² in that, on one occasion, you, through your freight forwarding agent, furnished information concerning another person's business relationships with another person known or believed to be restricted from having any business relationship with or in a boycotting country.

Specifically, on or about March 22, 2005, in connection with the sale and/or transfer of goods or services (including information) from the United States to Lebanon, your freight forwarding agent furnished, on your behalf, an Agent's Certificate attesting that:

WE HEREBY ATTEST THAT:
A) THE VESSEL CARRYING THE GOODS:
IS ELIGIBLE TO ENTER INTO THE PORT OF DESTINATION (BEIRUT)
AND IT IS NOT ISRAELI NATIONALITY AND WILL NOT CALL AT ANY
ISRAELI PORT. . . .

¹ The alleged violation occurred during the year 2005. The Regulations governing the violation at issue are found in the 2005 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2005)).

² 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)), which has been extended by successive Presidential Notices, the most recent of which was July 23, 2008 (73 Fed. Reg. 43603 (July 25, 2008)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1706 (2000)).



All U.S. persons are required to comply with the Regulations. However, having considered all the facts and circumstances known to us at this time, including specifically the fact that you discovered the violation yourself and voluntarily disclosed it to us, we are closing this investigation with the issuance of this Warning Letter.

This warning letter applies only to the transaction(s) 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 which could result in the imposition of civil penalties and/or any of the other sanctions set forth in Section 764.3 of the Regulations. You should, therefore, ensure that Koch Chemical Technology Group Ltd. strictly adheres to the Regulations in all future transactions.

Warning letters are made available for public inspection in the Freedom of Information Reading Room section displayed on the Bureau of Industry and Security web site, at <http://efoia.bis.doc.gov>.

Should you have any questions or comments relating to this Warning Letter, please contact me at 202 482-2381.

Sincerely,

A handwritten signature in black ink, appearing to read "E.O. Weant III". The signature is written in a cursive, somewhat stylized font.

Edward O. Weant, III
Director
Office of Antiboycott Compliance



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

Ref: 2008/DO02/RF

WARNING LETTER

October 7, 2008

Mr. Kevin Byrne, Senior Vice President
& Senior Compliance Manager
Citibank, N.A.
480 Washington Blvd., 19th Floor
Jersey City, N.J. 07310

Case No. 08-07

Dear Mr. Byrne:

We, the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce ("BIS"), following our examination of certain export transactions of Citibank, N.A. ("Citibank"), have reason to believe that you, Citibank, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2008)) (the "Regulations"),¹ which are issued under the authority of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (the "Act"),² in that, on one occasion, you failed to report to the Department of Commerce ("Department") your receipt of a request to engage in a restrictive trade practice or boycott, as required by the Regulations.

Specifically, on or about 2 February 2007, in connection with the sale and/or transfer of goods or services (including information) from the United States to United Arab Emirates, you received a letter of credit, your reference number LC1-270118, which contained a request to furnish information concerning another person's business relationships with another person known or believed to be restricted from having any business relationship with or in a boycotting country. The request read as follows:

A certificate from the ship-owner, master or agent of vessel...stating the following: The vessel is eligible to enter into the ports of UAE in conformity with its law and regulations.

Section 760.5 of the Regulations requires United States persons to report to the Department their receipts of such requests. You failed to report to the Department your receipt of this request.

¹ The alleged violation occurred during the year 2007. The Regulations governing the violation at issue are found in the 2007 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2007)).

² 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)), which has been extended by successive Presidential Notices, the most recent of which was July 23, 2008 (73 Fed. Reg. 43603 (July 25, 2008)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1706 (2000)).



All U.S. persons are required to comply with the Regulations. However, having considered all the facts and circumstances known to us at this time, including the results of our examination of Citibank's export transactions, we are closing this investigation with the issuance of this Warning Letter.

This Warning Letter applies only to the transaction(s) 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 which could result in the imposition of civil penalties and/or any of the other sanctions set forth in Section 764.3 of the Regulations. You should, therefore, ensure that Citibank strictly adheres to the Regulations in all future transactions.

Warning letters are made available for public inspection in the Freedom of Information Reading Room section displayed on the Bureau of Industry and Security web site, at <http://efoia.bis.doc.gov>.

Should you have any questions or comments relating to this Warning Letter, please contact me at 202 482-2381.

Sincerely,

A handwritten signature in black ink that reads "Edward O. Weant, III". The signature is written in a cursive style with a horizontal line under the name.

Edward O Weant, III
Director
Office of Antiboycott Compliance

cc: Mr. Ephram Graff, Director
Citibank, N.A.
3900 Citibank Drive
Tampa, FL 33610-9122