



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

AUG 18 2009

WARNING LETTER
BY COURIER

The Bank of New York Mellon
6023 Airport Road
Oriskany, NY 13424

Attention: Matthew R. DeBella, Assistant Vice President

Case No. 07-04

Dear Mr. DeBella:

We, the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce ("BIS"), following our examination of a certain export letter of credit transaction of Bank of New York Mellon ("BNYM"), have reason to believe that you, BNYM, have violated §760.2(d) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2009)) (the "Regulations"), 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"),¹ in that you have furnished information about your or another person's business relationships with or in a boycotted country.

Specifically, during the period February through March, 2007, in connection with your advice of a letter of credit, a transaction involving the sale and/or transfer of goods or services from the United States to Yemen, you furnished to persons in Yemen documents containing the following statement:

The goods mentioned in this certificate are neither of
Israeli origin nor do they contain Israeli materials.

Section 760.2(d) of the Regulations prohibits providing such information.

¹ Since August 21, 2001, the Act has been in lapse. However, 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 August 13, 2009 (74 Fed. Reg. 41,325 (August 14, 2009)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707 (2000)).



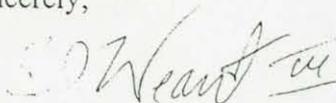
All U.S. persons are required to comply with the Regulations. However, having considered all the facts and circumstances known to us at this time, including specifically the fact that you discovered the violation yourself and voluntarily disclosed this to us, we are closing this matter with the issuance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



Edward O. Weant, III
Director
Office of Antiboycott Compliance

cc: Alba J. Rovira, Managing Counsel
Legal Department
The Bank of New York Mellon
One Wall Street, 15th Floor
New York, N.Y. 10286



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

WARNING LETTER

30 September 2009

CENTRIA
1005 Beaver Grade Road
Moon Township, PA 15108

Case No. 09.16

Gentlemen/Ladies:

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 CENTRIA, have reason to believe that you, CENTRIA, have violated Section 760.2(d) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2009)) (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 furnished information concerning your or another person's business relationships with or in a boycotted country, with a business concern organized under the laws of a boycotted country, or with a national or resident of a boycotted country.

Specifically, on or about 25 May 2005, in connection with the sale and/or transfer of goods or services (including information) from the United States to Bahrain, you furnished to your freight forwarder a Commercial Invoice with the following certification affixed thereon:

THE GOODS SHIPPED ARE NOT OF ISRAELI ORIGIN NOR DO THEY CONTAIN ANY ISRAELI MATERIALS. THEY ARE NOT DESIGNATED TO VISIT ANY ISRAELI PORTS NOR ARE THEY EXPORTED FROM ISRAEL. THEY ARE OF U.S.A. ORIGIN.

Section 760.2(d) of the Regulations prohibits providing such information.

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)). The prior year's Regulations are substantially the same as the 2009 version of the Regulations which governs the procedural aspects of this matter.

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 August 13, 2009 (74 Fed. Reg. 41325 (August 14, 2009)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707 (2000)).



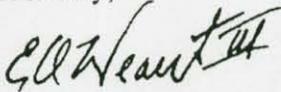
All U.S. persons are required to comply with the Regulations. However, having considered all the facts and circumstances known to us at this time, including specifically the fact that you discovered the violation yourself and voluntarily disclosed it to us, we are closing this investigation with the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

This warning letter applies only to the transaction 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 CENTRIA 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