



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

WARNING LETTER

23 July 2010

Thermon Manufacturing Company
P O Box 609
San Marcos, TX 78667

Case No. 09.20

Gentlemen/Ladies:

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 Thermon Manufacturing Company (Texas) ("Thermon US"), have reason to believe that you, Thermon US, have violated Section 760.5 of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2010)) (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 7 January 2004, in connection with the sale and/or transfer of goods or services (including information) from the United States to Dubai, you received a Letter of Credit issued by Banque Banorabe (Dubai) which set out as one of the documentary requirements of the letter of credit:

A CERTIFICATE ISSUED BY THE CARRIER OR MASTER OF THE VESSEL OR THEIR AGENTS STATING THAT THE SHIP IS ALLOWED BY THE ARAB AUTHORITIES TO CALL AT ARABIAN PORTS AND IS NOT SCHEDULED TO CALL AT ANY ISRAELI PORT DURING THE TRIP TO ARABIAN PORTS (IN CASE SHIPMENT EFFECTED BY SEA.

¹ The 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)). The prior year's Regulations are substantially the same as the 2010 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)).



Section 760.5 of the Regulations requires United States persons to report to the Department their receipt of such request. 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 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 Thermon US 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

WARNING LETTER

July 26, 2010

Mr. Christian Olrick
M and R International, Inc.
200 Connecticut Avenue
Norwalk, CT 06854

Case No. 09-08

Dear Mr. Olrick:

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 M & R International, Inc. ("MRI"), have reason to believe that you, MRI, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2010)) (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 your receipt of a request to engage in a restrictive trade practice or boycott, as required by the Regulations.

Specifically, on or about January 2, 2007, 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 AGENTS
CERTIFYING THAT THE CARRYING VESSEL IS ALLOWED BY ARAB
AUTHORITIES TO CALL AT ARABIAN PORTS DURING ITS VOYAGE
TO UNITED ARAB EMIRATES.

¹ The alleged violation occurred during the year 2007. The Regulations governing the violations 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 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)).



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

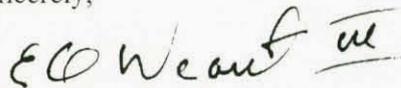
All U.S. persons are required to comply with the Regulations. However, having considered all the facts and circumstances known to us at this time, including the results of our examination of MRI's export transactions, we are closing this investigation with the issuance of this Warning Letter.

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 MRI 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,

Handwritten signature of Edward O. Weant III in cursive script.

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

April 28, 2010

Brian Leber
Director of Customer Service
Tate Access Floors, Inc.
7510 Montevideo Road
Jessup, Maryland 20794

Case No. 09-10

Dear Mr. Leber:

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 Tate Access Floors, Inc. ("Tate"), have reason to believe that you, Tate, have violated 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 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 March 27, 2008 in connection with the sale and/or transfer of goods or services (including information) from the United States to Kuwait, 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 FROM THE SHIPPING COMPANY/CARRIER
OR THEIR AGENT OR OWNER/MASTER/CAPTAIN OF THE
VESSEL CERTIFYING THAT THE CARRYING VESSEL (A)
IS ALLOWED TO ENTER KUWAITI PORTS . . .

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.

¹The alleged violation occurred during the year 2008. The Regulations governing the violation at issue are found in the 2008 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2008)).

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 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 the results of our examination of Tate'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 Tate strictly adheres to the Regulations in all future transactions.

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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 "EO Weant III". The signature is written in a cursive, somewhat stylized font.

Edward O. Weant, III
Director
Office of Antiboycott Compliance