

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

In the Matter of:)
)
A.M. Castle & Co.)
3400 North Wolf Road)
Franklin Park, IL 60131)
)
Respondent)

ORDER RELATING TO A.M. CASTLE & CO.

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified A.M. Castle & Co. (“AMC”) of its intention to initiate an administrative proceeding against AMC pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),¹ and Section 13(c) of the Export Administration Act of 1979, as amended (the “Act”),² through the issuance of a Proposed Charging Letter to AMC that alleges that it committed 65 violations of the Regulations. Specifically, the charges are:

Charges 1-65 15 C.F.R. § 764.2(a) - Engaging in Conduct Prohibited by the Regulations by Exporting Aluminum Alloy, an Item Controlled for Nuclear Non-Proliferation Reasons, to the People’s Republic of China, Singapore, Malaysia and Mexico Without the Required Licenses

On 65 occasions between on or about January 11, 2005, and on or about January 10, 2008, AMC engaged in conduct prohibited by the Regulations by exporting aluminum alloy, an item subject to the Regulations, classified under Export Control Classification Number 1C202 and controlled for nuclear non-proliferation reasons, and valued at approximately \$196,000 in total, from the United States to the People’s Republic of China, Singapore, Malaysia and Mexico without the

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2011). The charged violations occurred in 2005 through 2008. The Regulations governing the violations at issue are found in the 2005 through 2008 versions of the Code of Federal Regulations. 15 C.F.R. Parts 730-774 (2005-2008). The 2011 Regulations set forth the procedures that apply to this matter.

² 50 U.S.C. app. §§ 2401-2420 (2000). 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 being that of August 12, 2011 (76 Fed. Reg. 50,661 (Aug. 16, 2011)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701 *et seq.*).

Department of Commerce licenses required by Section 742.3 of the Regulations. In so doing, AMC committed 65 violations of Section 764.2(a) of the Regulations.

WHEREAS, BIS and AMC have entered into a Settlement Agreement pursuant to Section 766.18(a) of the Regulations, whereby they agreed to settle this matter in accordance with the terms and conditions set forth therein; and

WHEREAS, I have approved of the terms of such Settlement Agreement;

IT IS THEREFORE ORDERED:

FIRST, AMC shall be assessed a civil penalty in the amount of \$775,000. AMC shall pay \$155,000 to the U.S. Department of Commerce no later than September 30, 2011.

Thereafter, AMC shall pay \$155,000 to the U.S. Department of Commerce no later than October 28, 2011; \$155,000 no later than November 30, 2011; \$155,000 no later than December 30, 2011; and \$155,000 no later than February 15, 2012. Payment shall be made in the manner specified in the attached instructions.

SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (2000)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and if payment is not made in full accordance with the payment schedule specified herein, AMC will be assessed, in addition to the full amount of the civil penalty and interest, a penalty charge and an administrative charge, as more fully described in the attached Notice.


THIRD, AMC shall complete an audit of its export controls compliance program as set forth in this Paragraph. The results of the audit, including any relevant supporting materials, shall be submitted to the Department of Commerce, Bureau of Industry and Security, Office of Export Enforcement, One Oakbrook Terrace, Suite 804, Oakbrook Terrace, IL 60181 ("BIS Chicago Field Office"). The audit shall cover the 12-month period beginning on the date of this

Order, and the related report shall be due to the BIS Chicago Field Office no later than fourteen (14) months from the date of this Order. Said audit shall be in substantial compliance with the EMS sample audit module, and shall include an assessment of AMC's compliance with the Regulations. The EMS sample module is available on the BIS website at http://www.bis.doc.gov/complianceandenforcement/revise_emcp_audit.pdf. In addition, where said audit identifies actual or potential violations of the Regulations, AMC must promptly provide copies of the pertinent air waybills and other export control documents and other supporting documentation.

FOURTH, that the full and timely payment of the civil penalty in accordance with the payment schedule set forth above, and the timely completion and submission of the results of the audit set forth above, are hereby made conditions to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to AMC. Accordingly, if AMC should fail to make any of the civil penalty installment payments in full or in a timely manner, or fail to complete and submit the results of the audit in a timely manner, the undersigned may issue an Order denying all of AMC's export privileges under the Regulations for any or all of the period from the date of the failure through, as applicable, one year from the scheduled due date of the final civil penalty installment payment, or one year from the due date for the submission of the results of the completed audit.

FIFTH, that the Proposed Charging Letter, the Settlement Agreement, and this Order shall be made available to the public.

This Order, which constitutes the final agency action in this matter, is effective immediately.


DONALD G. SALO, DAS (ACTING FOR)
David W. Mills
Assistant Secretary of Commerce
for Export Enforcement

Issued this 8th day of September, 2011.

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

In the Matter of:)
)
A.M. Castle & Co.)
3400 North Wolf Road)
Franklin Park, IL 60131)
)
Respondent)

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between A.M. Castle & Co. (“AMC”) and the Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) (collectively, the “Parties”), pursuant to Section 766.18(a) of the Export Administration Regulations (the “Regulations”),¹ issued pursuant to the Export Administration Act of 1979, as amended (the “Act”).²

WHEREAS, AMC filed a voluntary self-disclosure with BIS’s Office of Export Enforcement in accordance with Section 764.5 of the Regulations concerning the transactions at issue herein;

WHEREAS, BIS has notified AMC of its intention to initiate an administrative proceeding against AMC, pursuant to the Act and the Regulations;

¹ The Regulations are currently codified at 15 C.F.R. Parts 730-774 (2011). The charged violations occurred in 2005 through 2008. The Regulations governing the violations at issue are found in the 2005 through 2008 versions of the Code of Federal Regulations. 15 C.F.R. Parts 730-774 (2005-2008). The 2011 Regulations set forth the procedures that apply to this matter.

² 50 U.S.C. app. §§ 2401-2420 (2000). 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 being that of August 12, 2011 (76 Fed. Reg. 50,661 (Aug. 16, 2011)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701 *et seq.*).

WHEREAS, BIS has issued a Proposed Charging Letter to AMC that alleges that AMC committed 65 violations of the Regulations, specifically:

Charges 1-65 15 C.F.R. § 764.2(a) - Engaging in Conduct Prohibited by the Regulations by Exporting Aluminum Alloy, an Item Controlled for Nuclear Non-Proliferation Reasons, to the People's Republic of China, Singapore, Malaysia and Mexico Without the Required Licenses

On 65 occasions between on or about January 11, 2005, and on or about January 10, 2008, AMC engaged in conduct prohibited by the Regulations by exporting aluminum alloy, an item subject to the Regulations, classified under Export Control Classification Number 1C202 and controlled for nuclear non-proliferation reasons, and valued at approximately \$196,000 in total, from the United States to the People's Republic of China, Singapore, Malaysia and Mexico without the Department of Commerce licenses required by Section 742.3 of the Regulations. In so doing, AMC committed 65 violations of Section 764.2(a) of the Regulations.

WHEREAS, AMC has reviewed the Proposed Charging Letter and is aware of the allegations made against it and the administrative sanctions that could be imposed against it if the allegations are found to be true;

WHEREAS, AMC fully understands the terms of this Agreement and the Order ("Order") that the Assistant Secretary of Commerce for Export Enforcement will issue if he approves this Agreement as the final resolution of this matter;

WHEREAS, AMC enters into this Agreement voluntarily and with full knowledge of its rights after having consulted with counsel;

WHEREAS, AMC states that no promises or representations have been made to it other than the agreements and considerations herein expressed;

WHEREAS, AMC neither admits nor denies the allegations contained in the Proposed Charging Letter;

WHEREAS, AMC wishes to settle and dispose of all matters alleged in the Proposed Charging Letter by entering into this Agreement; and

WHEREAS, AMC agrees to be bound by the Order, if issued;

NOW THEREFORE, the Parties hereby agree, for purposes of this Settlement Agreement, as follows:

1. BIS has jurisdiction over AMC, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.

2. The following sanctions shall be imposed against AMC in complete settlement of the alleged violations of the Regulations relating to the transactions specifically detailed in the Proposed Charging Letter:

a. AMC shall be assessed a civil penalty in the amount of \$775,000.

AMC shall pay \$155,000 to the U.S. Department of Commerce no later than September 30, 2011. Thereafter, AMC shall pay \$155,000 to the U.S. Department of Commerce no later than October 28, 2011; \$155,000 no later than November 30, 2011; \$155,000 no later than December 30, 2011; and \$155,000 no later than February 15, 2012. Payment shall be made in the manner specified in the attached instructions.

b. AMC shall complete an audit of its export controls compliance program, as set forth in this Paragraph. The results of the audit, including any relevant supporting materials, shall be submitted to the Department of Commerce, Bureau of Industry and Security, Office of Export Enforcement, One Oakbrook Terrace, Suite 804, Oakbrook Terrace, IL 60181 ("BIS Chicago Field Office"). The audit shall cover the 12-month period beginning on the date of the Order, and

the related report shall be due to the BIS Chicago Field Office no later than fourteen (14) months from the date of the Order. Said audit shall be in substantial compliance with the EMS sample audit module, and shall include an assessment of AMC's compliance with the Regulations. The EMS sample module is available on the BIS website at

http://www.bis.doc.gov/complianceand enforcement/ revised_emcp_audit.pdf.

In addition, where said audit identifies actual or potential violations of the Regulations, AMC must promptly provide copies of the pertinent air waybills and other export control documents and other supporting documentation.

c. The full and timely payment of the civil penalty in accordance with the payment schedule agreed to in Paragraph 2.a above, and the timely completion and submission of the results of the audit agreed to in Paragraph 2.b above, are hereby made conditions to the granting, restoration, or continuing validity of any export license, permission, or privilege granted, or to be granted, to AMC. Failure to make full and timely payment of any of the civil penalty installment payments may result in the denial of all of AMC's export privileges under the Regulations for any or all of the period from the date of the failure through one year from the scheduled due date of the final civil penalty installment payment. Failure to complete and submit the results of the audit in a timely manner also may result in the denial of all of AMC's export privileges under the Regulations for any or all of the period from the date of the failure through one year from the due date for the submission of the results of the completed audit.

3. Subject to the approval of this Agreement pursuant to paragraph 8 hereof, AMC hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violations of this Agreement or the Order, if issued), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if issued; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued. AMC also waives and will not assert any Statute of Limitations defense, and the Statute of Limitations will be tolled, for the time period from the date of the Order, if issued, until the later of the date AMC pays in full the civil penalty agreed to in Paragraph 2.a of this Agreement or the date AMC submits the results of the completed compliance audit set forth in Paragraph 2.b of this Agreement, in connection with any violations of the Act or the Regulations arising out of the transactions identified in the Proposed Charging Letter, or in connection with collection of the civil penalty or enforcement of the Agreement and Order, if issued.

4. Upon full and timely payment of the civil penalty as set forth in Paragraph 2.a above, and timely completion and submission of the results of the audit as set forth in Paragraph 2.b above, BIS will not initiate any further administrative proceeding against AMC in connection with any violations of the Act or the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter.

5. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, available to the public.

6. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of


Commerce for Export Enforcement pursuant to Section 766.18(a) of the Regulations, no Party may use this Agreement in any administrative or judicial proceeding and the Parties shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding.

7. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, if issued; nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the U.S. Government with respect to the facts and circumstances addressed herein.

8. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement approves it by issuing the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

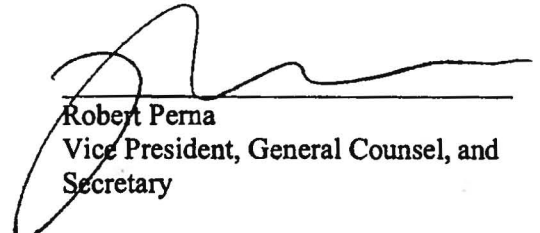
9. Each signatory affirms that he has authority to enter into this Settlement Agreement and to bind his respective party to the terms and conditions set forth herein.

BUREAU OF INDUSTRY AND SECURITY
U.S. DEPARTMENT OF COMMERCE



Douglas Hassebrock
Director
Office of Export Enforcement

A.M. Castle & Co.



Robert Perna
Vice President, General Counsel, and
Secretary

Date: _____

9/11/11

Date: _____

9/6/2011

PROPOSED CHARGING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

A.M. Castle & Co.
3400 North Wolf Road
Franklin Park, IL 60131

Attention: Michael Goldberg
Chief Executive Officer

Dear Mr. Goldberg:

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that A.M. Castle & Co. (“AMC”) has committed 65 violations of the Export Administration Regulations (the “Regulations”),¹ which issued under the authority of the Export Administration Act of 1979, as amended (the “Act”).² Specifically, BIS charges that AMC committed the following violations:

Charges 1-65 15 C.F.R. § 764.2(a) - Engaging in Conduct Prohibited by the Regulations by Exporting Aluminum Alloy, an Item Controlled for Nuclear Non-Proliferation Reasons, to the People’s Republic of China, Singapore, Malaysia and Mexico Without the Required Licenses

As described in greater detail in the attached Schedule of Violations, which is incorporated herein, on 65 occasions between on or about January 11, 2005, and on or about January 10, 2008, AMC engaged in conduct prohibited by the Regulations by exporting aluminum alloy, an item subject to the Regulations, classified under Export Control Classification Number 1C202 and controlled for nuclear non-proliferation reasons, and valued at approximately \$196,000 in total, from the United States to the

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2011). The charged violations occurred in 2005 through 2008. The Regulations governing the violations at issue are found in the 2005 through 2008 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2005-2008)). The 2011 Regulations govern the procedural aspects of this case.

² 50 U.S.C. app. §§ 2401- 2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13,222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of August 12, 2011 (76 Fed. Reg. 50,661 (Aug. 16, 2011)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*).

People's Republic of China, Singapore, Malaysia and Mexico without the Department of Commerce licenses required by Section 742.3 of the Regulations. In so doing, AMC committed 65 violations of Section 764.2(a) of the Regulations.

* * * * *

Accordingly, AMC is hereby notified that an administrative proceeding is instituted against it pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions and any other liability, sanction, or penalty available under law, including but not limited to any or all of the following:

- The maximum civil penalty allowed by law of up to the greater of \$250,000 per violation or twice the value of the transaction that is the basis of the violation;³
- Denial of export privileges; and/or
- Exclusion from practice before BIS.

If AMC fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter, that failure will be treated as a default. 15 C.F.R. §§ 766.6 and 766.7 (2011). If AMC defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to AMC. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty on each of the charges in this letter.

AMC is further notified that it is entitled to an agency hearing on the record if it files a written demand for one with its answer. 15 C.F.R. § 766.6 (2011). AMC is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent it. 15 C.F.R. §§ 766.3(a) and 766.4 (2011).

The Regulations provide for settlement without a hearing. 15 C.F.R. § 766.18 (2011). Should AMC have a proposal to settle this case, AMC or its representative should transmit it through the attorney representing BIS named below.

The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, AMC's answer must be filed in accordance with the instructions in Section 766.5(a) of the Regulations with:

U.S. Coast Guard ALJ Docketing Center

³ See International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

A.M. Castle & Co.
Proposed Charging Letter
Page 3 of 3

40 S. Gay Street
Baltimore, Maryland 21202-4022

In addition, a copy of AMC's answer must be served on BIS at the following address:

Chief Counsel for Industry and Security
Attention: Parvin R. Huda
Room H-3839
United States Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Parvin R. Huda is the attorney representing BIS in this case; any communications that AMC may wish to have concerning this matter should occur through her. Ms. Huda may be contacted by telephone at (202) 482-5301.

Sincerely,

Doug R. Hassebrock
Director
Office of Export Enforcement

Enclosure

A.M. CASTLE & CO. SCHEDULE OF VIOLATIONS

Charge	Invoice/Ship Date	Invoice No.	Item	Value	ECCN	Country
1	1/11/2005	928798 A818880	5.0 RD Alum Bar	\$20,570	1C202	Singapore
2	3/7/2005	950198	4.0 RD Alum Bar	\$3,549	1C202	Singapore
3	4/18/2005	997701 997703 A825801	4.0/3.0 RD Alum Bar	\$4,479	1C202	Singapore
4	5/31/2005	424408 424416 A-794517	4.0/5.0 RD Alum Bar	\$5,431	1C202	Singapore
5	7/7/2005	441222	4.0 RD Alum Bar	\$2,776	1C202	Singapore
6	7/20/2005	456955 456963	4.0 RD Alum Bar 5.0 RD Alum Bar	\$7,701	1C202	Singapore
7	8/8/2005	28-627960	3.0 RD Alum Bar	\$1,170	1C202	Singapore
8	9/14/2005	479646	5.0 RD Alum Bar	Unknown	1C202	Singapore
9	9/15/2005	28-628104	7.5 RD Alum Bar	\$2,292	1C202	China
10	9/20/2005	28-628152	3.0 RD Alum Bar	\$3,499	1C202	China
11	9/27/2005	498865 A794536 498870	4.0 RD Alum Bar 5.0 RD Alum Bar	\$3,163	1C202	Singapore
12	10/25/2005	5216666 A794538 521674	3.0 RD Alum Bar 4.0 RD Alum Bar	\$2,781	1C202	Singapore
13	11/17/2005	541429 A794540 541430	3.0 RD Alum Bar 4.0 RD Alum Bar	\$1,330	1C202	Singapore
14	12/6/2005	28-628420	5.5 RD Alum Bar	\$1,311	1C202	China
15	12/22/2005	568219	5.0 RD Alum Bar	Unknown	1C202	Singapore
16	1/9/2006	28-628510 28-628511	3.0 RD Alum Bar	\$233	1C202	China

Charge	Invoice/Ship Date	Invoice No.	Item	Value	ECCN	Country
17	1/9/2006	564024 564026 564095	3.0/4.0/5.0 RD Alum Bar	\$2,256	1C202	Singapore
18	1/13/2006	28-628477	3.0 RD Alum Bar	\$617	1C202	China
19	1/20/2006	583910	4.0 RD Alum Bar	\$5,605	1C202	Singapore
20	2/1/2006	583902 A794546 541431	3.0 RD Alum Bar 5.0 RD Alum Bar	\$5,964	1C202	Singapore
21	2/21/2006	602370 602371	3.0/4.0 RD Alum Bar	\$3,322	1C202	Singapore
22	3/10/2006	623311	5.0 RD Alum Bar	\$1,692	1C202	Singapore
23	3/23/2006	623581	4.0 RD Alum Bar	\$340	1C202	Singapore
24	4/13/2006	647861	5.0 RD Alum Bar	\$2,203	1C202	Singapore
25	5/1/2006	21-739204	4.0/5.0 RD Bar	\$1,410	1C202	Mexico
26	5/1/2006	659395 659403 659409	3.0.4.0 RD Alum Bar	\$8,488	1C202	Singapore
27	5/11/2006	669614	5.0 RD Alum Bar	\$445	1C202	Singapore
28	6/6/2006	21-742050	4.0 RD Alum Bar	\$1,134	1C202	Mexico
29	6/7/2006	21-742046	6.5/4.0 RD Bar	\$2,481	1C202	Mexico
30	6/7/2006	21-742071	5.0 RD Alum Bar	\$814	1C202	Mexico
31	6/15/2006	689760 689767	4.0/3.0 RD Bar	\$3,174	1C202	Singapore
32	6/21/2006	28-628946	5.5 RD Alum Bar	\$797	1C202	China
33	6/22/2006	21-743547	6.5/4.2/3.5 RD Alum Bar	\$3,099	1C202	Mexico
34	7/18/2006	28-629221	3.75 RD Alum Bar	\$1,598.00	1C202	China
35	7/31/2006	722675 722682	4.0 RD Alum Bar 5.0 RD Alum Bar	\$16,643	1C202	Singapore
36	8/21/2006	737581 A794567	3.0 RD Alum Bar	\$84	1C202	Singapore
37	8/30/2006	750060	5.0 RD Alum Bar	Unknown	1C202	Singapore
38	8/30/2006	737961 A737739	4.0 RD Alum Bar	\$1,831	1C202	Singapore

Charge	Invoice/Ship Date	Invoice No.	Item	Value	ECCN	Country
39	9/6/2006	21-749502	5.0 RD Alum Bar	\$585	1C202	Mexico
40	9/26/2006	21-751093	5.0 RD Alum Bar	\$862	1C202	Mexico
41	9/26/2006	759636 01760100	5.0 RD Alum Bar	\$3,426	1C202	Singapore
42	10/20/2006	21-751095	6.5 RD Alum Bar	\$1,957	1C202	Mexico
43	11/15/2006	28-629672	4.5 RD Alum Bar	\$3,514	1C202	Singapore
44	12/4/2006	810355 810370 810347	5.0 RD Alum Bar 3.0 RD Alum Bar	\$7,483	1C202	Singapore
45	12/19/2006	28-629794	5.5 RD Alum Bar	\$1,792	1C202	China
46	12/27/2006	21-757478	5.0 RD Alum Bar	\$897	1C202	Mexico
47	1/15/2007	28-629810	3.0 RD Alum Bar 5.0 RD Alum Bar	\$1,831	1C202	China
48	2/23/2007	21-761464	4.25 RD Alum Bar	\$655	1C202	Mexico
49	3/12/2007	21-762589	4.25/5.0 RD Alum Bar	\$3,057	1C202	Mexico
50	4/11/2007	893812/266	3.0 RD Alum Bar	\$207	1C202	Singapore
51	4/22/2007	28-629975	3.0 RD Alum Bar	\$1,848	1C202	China
52	5/3/2007	893820 41-50307	4.0 RD Alum Bar	\$5,324	1C202	Singapore
53	5/10/2007	41-101486	3.0 RD Alum Bar	\$139	1C202	Singapore
54	5/15/2007	28-630215	3.75 RD Alum Bar	\$900	1C202	China
55	8/3/2007	41-102459	5.0 RD Alum Bar	\$5,366	1C202	Singapore
56	8/21/2007	21-774158 21-774120	4.25 RD Alum Bar 4.0 RD Alum Bar	\$1,093	1C202	Mexico
57	9/6/2007	KAC090607	5.0 RD Alum Bar 3.0 RD Alum Bar	\$2,014	1C202	Singapore
58	9/25/2007	21-776686	3.5 RD Alum Bar	\$1,216	1C202	Mexico
59	10/12/2007	21-774159	4.25RD Alum Bar	\$1,201	1C202	Mexico
60	10/12/2007	28-630745	5.5 RD Alum Bar	\$1,125	1C202	Malaysia
61	10/24/2007	41-103464	5.0 RD Alum Bar	\$2,748	1C202	Singapore
62	10/29/2007	KAC102907 48885	4.0 RD Alum Bar 5.0 RD Alum Bar	\$9,288	1C202	Singapore
63	12/11/2007	21-781985	4.0 RD Alum Bar	\$951	1C202	Mexico

Charge	Invoice/Ship Date	Invoice No.	Item	Value	ECCN	Country
64	1/8/2008	21-783254	5.5 RD Alum Bar	\$5,022	1C202	Mexico
65	1/10/2008	21-783255	3.5/4.5 RD Alum Bar	\$7,174	1C202	Mexico

\$195,957