

MAY 23, 1983

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OFFICE OF THE DIRECTOR  
BUREAU OF POLITICO-MILITARY AFFAIRS  
DEPARTMENT OF STATE  
WASHINGTON, D. C.  
MAY 23, 1983

In the Matter of )  
Robert Manina, Former General Manager )  
of Marsland Engineering LTD )  
Waterloo, Ontario, Canada )  
Respondent )

The United States Attorney's Office for the Eastern District of Virginia, the Public Integrity Section of the Criminal Division, U.S. Department of Justice and the U.S. Custom Service have conducted an investigation relating to the purchase and sale by Leigh Systems, Inc. of Syracuse, New York, of a Cohu Model 4410/ISIT television camera which contained a 4849 Intensifier Silicon-Intensifier Target (ISIT) tube. Leigh Systems, Inc., as well as Marsland Engineering, Ltd., were, in 1977, both subsidiaries of the Leigh Instruments, Ltd. of Canada. During 1977, Robert Manina was General Manager of Marsland Engineering and Vice President of the parent company, Leigh, Instruments, Ltd.

On August 5, 1977, Leigh Systems, Inc. purchased the Cohu camera containing an ISIT tube from Applied Systems Corporation, a Virginia based company. Transfer of title took place in Syracuse, New York. On the same day the Cohu camera containing

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an ISIT tube was exported by Leigh Systems, Inc., to Waterloo, Ontario, Canada. As part of a larger mobile security and surveillance system designed, manufactured and assembled by Leigh, the camera was modified (but not functionally changed) for that system and the system was thereafter exported from Canada to Libya by Leigh. Robert Manina, acting in his capacity as General Manager of Marsland Engineering Ltd. was responsible with others for the purchase of the camera from Applied Systems, its sale to Libyan purchasers and its exportation from the United States via Canada to Libya.

The exportation of the Cohu camera containing an ISIT tube was undertaken without an export license from the Office of Munitions Control. Such an unauthorized export of an item on the U.S. Munitions List is prohibited by 22 U.S.C. Section 2778.

The United States Attorney's Office, the Public Integrity Section and Robert Manina have agreed that further proceedings against Robert Manina should be terminated if the Department of State agrees to impose a civil penalty on Robert Manina. Mr. Manina has agreed to waive any procedural or substantive rights set forth under the International Traffic in Arms Regulations relating to the imposition of civil penalties, including but not limited to the filing of charging letters, answers and demands for oral hearings, discovery, prehearing

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conference and hearings, proceedings before and Report of Hearing Commissioner and any appeals.

Upon reviewing all the facts of this case, and upon the recommendation of the U.S. Attorney's office and the Public Integrity Section, I have determined that a civil penalty of \$7,000 is fair, reasonable, and appropriate in this case and that it should be imposed.

Without admitting any violation of law or the regulations, Robert Manina consents to an order for the purpose of terminating the proceedings against him relating to the above-referenced export and waives all the International Traffic in Arms Regulations rights referred to above.

Therefore, pursuant to the authority delegated to me, it is

ORDERED

A civil penalty in the sum of SEVEN THOUSAND DOLLARS is imposed on Robert Manina, to be paid in a manner determined by the Office of Munitions Control.

I consent to this Order for the Office Munitions Control.

*William B. Robinson*  
William B. Robinson  
Director

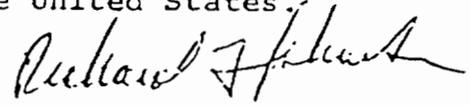
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I consent to this order.

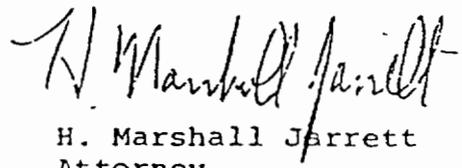


Robert Manina  
Former General Manager  
Marsland Engineering, LTD.

I consent to this Order for the United States.

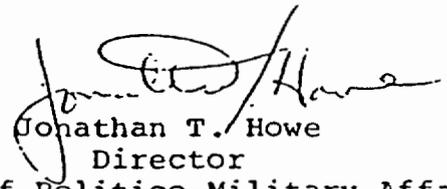


Richard F. Johnston  
Attorney  
Public Integrity Section  
Criminal Division



H. Marshall Jarrett  
Attorney  
Public Integrity Section  
Criminal Division

This order is effective immediately.



Jonathan T. Howe  
Director

November 16, 1983

Bureau of Politico-Military Affairs