



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

WARNING LETTER

December 15, 2016

Military Professional Resources, Inc.
3750 Centerview Drive
Chantilly, Virginia 20151

Attention: Mr. Jon Brooks, Esq.
VP, Deputy General Counsel and
Corporate Compliance Officer

Case No. 15-01

Dear Mr. Brooks:

We, the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce, following our examination of certain export transactions of Military Professional Resources, Inc. ("MPRI"), have reason to believe that you, MPRI, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2016))(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 two occasions, 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 December 28, 2011, and February 19, 2014, respectively, in connection with the sale and/or transfer of goods or services (including information) from the United States to Kuwait, you received letters of credit #4/102/46642/2011 dated December 15, 2011, and #4/102/046725/2014 dated February 10, 2014, issued by Central Bank of Kuwait, which set out requests to refrain from shipping goods from a boycotted country. The requests read as follows:

Importation of goods from Israel is strictly prohibited by Kuwait Import Regulations. Therefore, Certificates of Origin covering goods originated from the said countries are not acceptable.

¹The alleged violations occurred during the years 2012 and 2014. The Regulations governing the violations at issue are found in the 2012 and 2014 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2012 and 2014)).

²Since 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 4, 2016 (81 Fed. Reg. 52,587 (Aug. 8, 2016)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, et seq. (2006 & Supp. IV 2010)).



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 receipts of these requests.

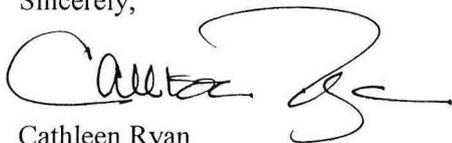
All U.S. persons are required to comply with the Regulations. However, having considered all the facts and circumstances known to us at this time, including the results of our examination of MPRI's export transactions, we are closing this investigation with the issuance of this Warning Letter.

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 MPRI 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 website, 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 "Cathleen Ryan". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

Cathleen Ryan
Director
Office of Antiboycott Compliance