



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

WARNING LETTER

May 23, 2018

Lockheed Martin Corporation
2121 Crystal Drive
Suite 100
Arlington, Virginia 22202

Attention: Kevin C. Darrenkamp, Esq.
General Counsel,
International Trade Compliance

Case No. 17-06

Gentlemen/Ladies:

We, the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce, following our examination of certain export records of Lockheed Martin Corporation, have reason to believe that you, Lockheed Martin Corporation, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2018))(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 business relationships with or in a boycotted country, with a business concern organized under the laws of a boycotted country, with any national or resident of a boycotted country or with any other person who is known or believed to be restricted from having any business relationship with or in a boycotting country.

Specifically, on or about July 22, 2014, in connection with the sale and/or transfer of goods or services (including information) from the United States to Korea for sale to third-country customers, you provided a certification that the goods did not contain Israeli parts or components. Section 760.2(d) of the Regulations prohibits furnishing such information.

In addition, 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 July 22, 2014, in connection with the sale or transfer of goods or services in the above described transaction, you received a request to confirm whether the goods contained any parts or components made in Israel.

¹The alleged violations occurred during the year 2014. The Regulations governing the violations at issue are found in the 2014 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (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 15, 2017 (82 Fed. Reg. 39005 (Aug. 16, 2017)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, et seq. (2012)).



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

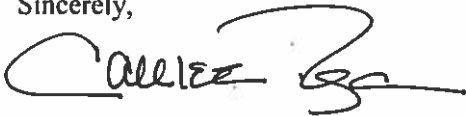
All United States persons are required to comply with the Regulations. However, having considered all the facts and circumstances known to us at this time, including specifically the fact that you discovered the violations yourself and voluntarily disclosed them to us, we are closing this investigation 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 Lockheed Martin Corporation 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 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", with a stylized flourish at the end.

Cathleen Ryan
Director
Office of Antiboycott Compliance