



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

WARNING LETTER

March 30, 2012

Brooke Horiuchi
Alliant Techsystems Inc.
1300 Wilson Boulevard
Suite 400
Arlington, VA 22209

Dear Ms. Horiuchi,

RE: **Alliant Techsystems Inc.**
(Integrated Weapon Systems division)
Case No. 10-01

We, the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce, following our examination of certain export transactions of Alliant Techsystems Inc. (Integrated Weapon Systems division) (“ATK-IWS”), have reason to believe that you, ATK-IWS, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2012)) (the “Regulations”), 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 your receipt of a request to engage in a restrictive trade practice or boycott, as required by the Regulations.

Specifically, on or about August 11, 2005, and December 9, 2008, in connection with the sale and/or transfer of goods or services (including information) from the United States to Kuwait, you received advice of Letter of Credit #4/102/046310/2005 and Letter of Credit #4/102/046508/2008, respectively, both issued by the Central Bank of Kuwait (Kuwait). Both Letters of Credit set out a request to take an action which would have the effect of

¹ The alleged violations occurred during the years 2005 and 2009. The Regulations governing the violations at issue are found in the 2005 and 2009 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2005 and 2009)). The prior years’ Regulations are substantially the same as the 2012 version of the Regulations which govern 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 being that of August 12, 2011 (76 Fed. Reg. 50661 (Aug. 16, 2011)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §1701 et seq.).



furthering or supporting a restrictive trade practice or boycott. 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 (sic) are not acceptable.

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 receipts of these requests.

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 the results of our examination of ATK-IWS's export transactions, we are closing this investigation with the issuance of this Warning Letter.

This Warning Letter applies only to the transactions 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 ATK-IWS 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,



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

March 7, 2012

Pittcon Architectural Metals, L.L.C.
6409 Rhode Island Avenue
Riverdale, Maryland 20737

Attention: Ms. Sheila Kovalchick
Accounting and Administrative Manager

Case No. 11-07

Gentlemen/Ladies

We, the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce, following our examination of certain export transactions of Pittcon Architectural Metals, L.L.C. ("PAM"), have reason to believe that you, PAM, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2011))(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 April 4, 2011, in connection with the sale and/or transfer of goods or services (including information) from the United States to Qatar, you received letter of credit # DPCDOH110620 dated March 17, 2011, issued by British Bank of the Middle East (United Arab Emirates) which set out 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 CO OR THEIR AGENT
STATING THAT THE GOODS ARE SHIPPED ON CONFERENCE
OR REGULAR LINE VESSELS: . . .
III) THAT ARE ALLOWED BY THE ARAB AUTHORITIES TO
CALL AT ARABIAN PORTS AND NOT SCHEDULED TO CALL
AT ANY ISRAELI PORT DURING ITS VOYAGE TO QATAR

¹The alleged violation occurred during the year 2011. The Regulations governing the violation at issue are found in the 2011 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2011))

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 being that of August 12, 2011 (76 Fed. Reg. 50661 (Aug. 16, 2011)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701 et seq.).



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.

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 PAM's export transactions, we are closing this investigation with the issuance of this Warning Letter.

This warning letter applies only to the transactions(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 PAM 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 that reads "E O Weant III". The signature is written in a cursive style with a horizontal line under the "III".

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

1 February 2012

PBS&J International Inc
4030 W Boy Scout Blvd, Suite 700
Tampa, FL 33607. 5713

Attention : C Ernest Edgar IV, Esq
General Counsel

Case No. 11.14

Gentlemen/Ladies:

We, the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce, following our examination of certain export transactions of PBS&J International Inc ("PBSJ") have reason to believe that you, PBSJ, have violated the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2011)) (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 three occasions, you failed to report timely 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, during the period June through August 2009, in connection with the sale and/or transfer of goods or services (including information) from the United States to Abu Dhabi, U.A.E., on three occasions, you received a request, as described in Table A, which is attached and incorporated herein by this reference, to take an action which would have the effect of furthering or supporting a restrictive trade practice or unsanctioned foreign boycott.

¹ The alleged violation occurred during the year 2009. The Regulations governing the violation at issue are found in the 2009 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2009)). The prior year's Regulations are substantially the same as the 2011 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 12, 2011 (76 Fed. Reg. 50661 (August 16, 2011)), 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 receipts of such requests. You failed to report timely 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 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 transactions 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 PBS&J International Inc 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 style with some flourishes.

Edward O Weant, III
Director
Office of Antiboycott Compliance

TABLE A

Schedule of Alleged Violations of Section 760.5
Failure to Report Receipts of Boycott Requests

PBS&J International Inc
Case No. 11.14

Item	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
1	Request for Proposal : Abu Dhabi City Municipality/ Roads and Infrastructure Assets Directorate	06.17.09	07.31.09	Abu Dhabi	BOYCOTT OF ISRAEL: THE SERVICE PROVIDER SHALL OBSERVE AND ABIDE BY ALL RULES AND REGULATIONS CONCERNING THE BOYCOTTING OF ISRAEL IN ABU DHABI AND THE U.A.E.
2	Instructions to Tenderers : Tender No P-08-T037/2009, Abu Dhabi General Services Company (<i>dba</i> Musanada)	07.30.09	10.31.09	Abu Dhabi	THE TENDERER SHALL ASCERTAIN AND COMPLY WITH ALL LAWS OF THE EMIRATE OF ABU DHABI AND FEDERAL LAWS OF THE UNITED ARAB EMIRATES AS APPLICABLE IN THE EMIRATE OF ABU DHABI, AND REQUIREMENTS OF AUTHORITIES AND DEPARTMENTS OF THE EMIRATE OF ABU DHABI, CONCERNING THE BOYCOTT OF ISRAEL
3	Instructions to Tenderers : Tender No T13/2009, Abu Dhabi General Services Company (<i>dba</i> Musanada)	08.19.09	10.31.09	Abu Dhabi	THE TENDERER SHALL ASCERTAIN AND COMPLY WITH ALL LAWS OF THE EMIRATE OF ABU DHABI AND FEDERAL LAWS OF THE UNITED ARAB EMIRATES AS APPLICABLE IN THE EMIRATE OF ABU DHABI, AND REQUIREMENTS OF AUTHORITIES AND DEPARTMENTS OF THE EMIRATE OF ABU DHABI, CONCERNING THE BOYCOTT OF ISRAEL

* Where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked by the last day of the month following the calendar quarter in which the request was received (§ 760.5(b)4)(i)).