UNITED STATES OF AMERICA
DEPARTMENT OF COMMERCE

In the Matter of	**Case No.** 26-06
BAE Systems Controls, Inc.	

ORDER

The Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce ("BIS") has notified BAE Systems Controls, Inc. ("BAE Systems Controls"),[1] of its intention to initiate an administrative proceeding pursuant to Section 766.3 of the Export Administration Regulations ("EAR" or the "Regulations"),[2] against BAE Systems Controls through the issuance of a Proposed Charging Letter to BAE Systems Controls (a copy of which is attached hereto and incorporated by reference)[3] that alleges that BAE Systems

[1] As set forth in the Proposed Charging Letter, BAE Systems Controls is a U.S. person, specifically, a domestic concern, under part 760 of the EAR. See Section 760.1 (Definitions).

[2] The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. parts 730–774 (2026). On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801–4852 ("ECRA"). The Anti-Boycott Act of 2018 is codified as Subchapter II of ECRA. The substantive antiboycott provisions of the EAR are set forth in part 760 of the EAR. Recordkeeping requirements related to part 760 are set forth in part 762 of the EAR.

[3] The violations alleged occurred during the years 2019 through 2024. The Regulations governing the violations at issue are found in the 2019-2024 version of the Code of Federal Regulations (15 C.F.R. parts 730-774 (2019-2024)). The 2026 Regulations govern the procedural aspects of this matter.

Controls committed eighty-one (81) violations of the Regulations.

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

WHEREAS, BAE Systems Controls admits committing the alleged conduct described in the Proposed Charging Letter; and:

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

IT IS THEREFORE ORDERED:

FIRST, that BAE Systems Controls shall be assessed a civil penalty in the amount of $ 303,750, the payment of which shall be made to the U.S. Department of Commerce within 30 days from the date of entry of this Order.

SECOND, that pursuant to the Debt Collections Act of 1982, as amended (31 U.S.C. §§3701 – 3720E (2012)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and if payment is not made by the due date specified herein, BAE Systems Controls shall 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, that the full and timely payment of the civil penalty in accordance with the payment schedule set forth above is hereby made a condition to the granting, restoration or continuing validity of any export license, license exception, permission, or privilege granted, or

to be granted, to BAE Systems Controls. Accordingly, should BAE Systems Controls fail to pay the civil penalty in a full and timely manner, the undersigned may issue an order denying all of BAE Systems Controls's export privileges under the Regulations for a period of one year from the date of failure to make such payment.

FOURTH, 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.

David A. Peters
Assistant Secretary of Commerce for Export Enforcement

Entered this 21st day of October, 2026

Attachments

NOTICE

The Order to which this Notice is attached describes the reasons for the assessment of the civil monetary penalty. It also specifies the amount owed and the date by which payment of the civil penalty is due and payable.

Under the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E) and the Federal Claims Collection Standards (31 C.F.R. Parts 900-904 (2026)), interest accrues on any and all civil monetary penalties owed and unpaid under the Order, from the date of the Order until paid in full. The rate of interest that the respondent is assessed is the rate of the current value of funds to the U.S. Treasury on the date that the Order was issued. However, interest is waived on any portion paid within 30 days of the date of the Order. See 31 U.S.C.A. § 3717 and 31 C.F.R. § 901.9.

The civil monetary penalty will be delinquent if not paid by the due date specified in the Order. If the penalty becomes delinquent, interest will continue to accrue on the balance remaining due and unpaid, and respondent will also be assessed both an administrative charge to cover the cost of processing and handling the delinquent claim and a penalty charge of six percent per year. However, although the penalty charge will be computed from the date that the civil penalty becomes delinquent, it will be assessed only on sums due and unpaid for over 90 days after that date. See 31 U.S.C.A. § 3717 and 31 C.F.R. § 901.9.

The foregoing constitutes the initial written notice and demand to respondent in accordance with section 901.2(b) of the Federal Claims Collection Standards (31 C.F.R. § 901.2(b)).

Payment instructions:

INSTRUCTIONS FOR PAYMENT OF CIVIL PENALTY

1.The civil penalty check should be made payable to:

U.S. Department of Commerce/BIS

2.The check should be mailed to:

U.S. Department of Commerce
Bureau of Industry and Security
Room H-6622
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

ATTN: Makayla Thompson

Payments may also be made electronically via FedWire, Automated Clearing House (ACH), and pay.gov.

Guidance for payment via FedWire, ACH, and pay.gov is attached.

UNITED STATES OF AMERICA
DEPARTMENT OF COMMERCE

In the Matter of	)	**Case No.** 26-06
BAE Systems Controls, Inc.	)	

SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") is made by and between BAE Systems Controls, Inc. ("BAE Systems Controls")[1] and the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce ("BIS") (together, the "Parties"), pursuant to Section 766.18(a) of the Export Administration Regulations ("EAR" or "Regulations").[2]

WHEREAS, BAE Systems Controls has filed a voluntary self-disclosure with BIS in accordance with Section 764.8 of the Regulations concerning the transactions at issue herein;

[1] As set forth in the Proposed Charging Letter, BAE Systems Controls is a U.S. person, specifically, a domestic concern, under part 760 of the EAR. See Section 760.1 (Definitions).

[2] The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. parts 730–774 (2026). On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801–4852 ("ECRA"). The Anti-Boycott Act of 2018 is codified as Subchapter II of ECRA. The substantive antiboycott provisions of the EAR are set forth in part 760 of the EAR. Recordkeeping requirements related to part 760 are set forth in part 762 of the EAR.

WHEREAS, BIS has notified BAE Systems Controls of its intention to initiate an administrative proceeding against BAE Systems Controls pursuant to the Regulations;

WHEREAS, BIS has issued to BAE Systems Controls a Proposed Charging Letter (a copy of which is attached hereto and incorporated herein by reference);[3] that alleges that BAE Systems Controls committed eighty-one (81) violations of the Regulations;

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

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

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

WHEREAS, BAE Systems Controls fully cooperated with BIS's Office of Antiboycott Compliance;

WHEREAS, BAE Systems Controls promptly initiated improvements to its compliance program, including by introducing an automated screening tool;

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[3] The violations alleged occurred during the years 2019 through 2024. The Regulations governing the violations at issue are found in the 2019-2024 version of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2019-2024)). The 2026 Regulations govern the procedural aspects of this matter.

WHEREAS, BAE Systems Controls admits committing the alleged conduct described in the Proposed Charging Letter; and

WHEREAS, BAE Systems Controls agrees to be bound by the Order, if issued;

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

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

2. The following sanctions shall be imposed against BAE Systems Controls:

   a. BAE Systems Controls shall be assessed a civil penalty in the amount of $ 303,750, the payment of which shall be made to the U. S. Department of Commerce within 30 days from the date of entry of the Order, and in accordance with the terms of the Order. Payment shall be made in the manner specified in the attached instructions.

   b. The full and timely payment of the civil penalty agreed to in Paragraph 2.a above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to BAE Systems Controls. Failure to make full and timely payment of the civil penalty may result in the denial of all of BAE Systems Controls's export privileges under the Regulations for a period of one year from the date of the failure to make such payment.

3. Subject to the approval of this Agreement pursuant to paragraph 7 hereof, BAE Systems Controls hereby waives all rights to further procedural steps in this matter including, without limitation, any right to:

a. an administrative hearing regarding the allegations in the Proposed 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. BAE Systems Controls also waives and will not assert any Statute of Limitations defense, and the Statute of Limitations will be tolled, in connection with any violation of the Anti-Boycott Act of 2018 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 this Agreement and the Order, if issued, from the date of the Order, until BAE Systems Controls pays in full the civil penalty agreed to in Paragraph 2.a of this Agreement.

4. BIS agrees that upon full and timely payment of the civil penalty as set forth in Paragraph 2.a above, BIS will not initiate any further administrative proceeding against BAE Systems Controls in connection with any violation of the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter.

5. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order not entered by the Assistant Secretary of Commerce for Export Enforcement, or appropriate designee, 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.

6. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise alter or 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.
7. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement, or appropriate designee, approves it by issuing the Order, which shall have the same force and effect as a decision and order issued after a full administrative hearing on the record.
8. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, available to the public.
9. Each signatory affirms that he/she has authority to enter into this Agreement and to bind his/her respective party to the terms and conditions set forth herein.

BAE Systems Controls, Inc.

DATE: 10/12/26

Terence Crimmins
President

U.S. Department of Commerce

REGINALD DUVEL Digitally signed by REGINALD DUVEL Date: 2026.10.15 11:00:59 -04'00'

DATE: 10/15/2026

Reginald Duvel
Acting Director
Office of Antiboycott Compliance

PROPOSED CHARGING LETTER

October 5, 2026

BAE Systems Controls, Inc.
1701 North Street
Endicott, NY 13760

Attention: Terry Crimmins
President, Electronic Systems

Case No 26-06

Dear Mr. Crimmins:

The Bureau of Industry and Security, Department of Commerce ("BIS")[1] has reason to believe that BAE Systems Controls, Inc. ("BAE Systems Controls"), has committed eighty-one (81) violations of the Export Administration Regulations (currently codified at 15 C.F.R. parts 730-774 (2026)) (the "Regulations" or "EAR").[2]

As detailed below, BIS alleges that BAE Systems Controls committed 81 violations of Section 764.2(i) of the Regulations by failing to report to BIS its receipt of 81 requests to engage in a restrictive trade practice or boycott, as required by Section 760.5 of the Regulations.

General Allegations

BAE Systems Controls is, and at all times relevant was, a domestic concern organized under the laws of the United States and doing business in the State of New York. As such, BAE Systems Controls is a United States person as defined by Section 760.1(b) of the Regulations.

During the period July 2019 through January 2024, BAE Systems Controls engaged in transactions involving the sale and/or transfer of goods from the United States to Qatar, activities in the interstate or foreign commerce of the United States, as defined in Section 760.1(d) of the Regulations.

[1] This action is brought by the Office of Antiboycott Compliance ("OAC") within the Bureau of Industry and Security. OAC is charged with enforcing the provisions of the Anti-Boycott Act of 2018.
[2] On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801-4852 ("ECRA"). The Anti-Boycott Act of 2018 is codified as Subchapter II of ECRA. The substantive antiboycott provisions of the EAR are set forth in part 760 of the EAR. Recordkeeping requirements related to part 760 are set forth in part 762 of the EAR.

Charges 1 - 81 (15 C.F.R. §764.2(i) – Failing to Comply with Reporting Requirements That Apply to the Receipt of a Request to Engage in a Restrictive Trade Practice or Foreign Boycott Against a Country Friendly to the United States)

During the period July 2019 through January 2024, BAE Systems Controls failed on 81 occasions to comply with reporting requirements under the Regulations that apply to the receipt of a request to take an action that would have the effect of furthering or supporting a restrictive trade practice or unsanctioned foreign boycott before the end of the month following the calendar quarter in which the request was received. Specifically, during this period, BAE Systems Controls received 81 purchase orders for the sale of commercial aircraft spare parts, totaling approximately $2.1 million in value, from one customer located in Qatar. Each order included the boycott-related language described in Table A.

BAE Systems Controls discovered the boycott-related language contained in each purchase order during an internal review undertaken after it became aware of the Qatari customer's inclusion on the March 2024 OAC Requester List. The OAC Requester List identifies entities or companies that have issued boycott-related requests, including requests to comply with the Arab League boycott of Israel, to U.S. persons.[3] BAE Systems Controls voluntarily self-disclosed the 81 boycott-related requests upon discovery.

Section 760.5 of the Regulations requires U.S. persons to report to BIS their receipt of any request to take an action that would have the effect of furthering or supporting a restrictive trade practice or unsanctioned foreign boycott. BAE Systems Controls failed to report to BIS its receipt of the 81 requests described in Table A. By failing to comply with the reporting requirements set forth in Section 760.5 of the Regulations on 81 occasions, BAE Systems Controls committed 81 violations of Section 764.2(i) of the Regulations.

* * *

Accordingly, BAE Systems Controls is hereby notified that an administrative proceeding is instituted against it pursuant to Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions,[4] including, but not limited to any or all of the following:

- The maximum civil penalty allowed by law of up to the greater of $374,474 per violation, or twice the value of the transaction that is the basis of the violation;[5]
- Denial of export privileges;

[3] For the current OAC Requester List, updated March 31, 2026, please see: https://www.bis.gov/media/documents/march-2026-requester-list.pdf. The OAC Requester List is updated and posted quarterly on the OAC website here: https://www.bis.gov/about-bis/bis-leadership-and-offices/OAC#reporting-requirements.

[4] The potential sanctions are specified in § 1774 of the Anti-Boycott Act of 2018, codified at 50 U.S.C. § 4843.

[5] This amount is subject to annual increases pursuant to the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, Sec. 701 of Public Law 114-74, enacted on November 2, 2015.

- Exclusion from practice before BIS; and/or

- Any other liability, sanction, or penalty available under law.

If BAE Systems Controls fails to answer the charges contained in this letter within thirty (30) days after service as provided in Section 766.6, such failure will be treated as a default under Section 766.7. If BAE Systems Controls defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to BAE Systems Controls. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty for the charges in this letter.

BAE Systems Controls is entitled to an agency hearing on the record as provided in Section 766.6 of the Regulations. If BAE Systems Controls wishes to have a hearing on the record, BAE Systems Controls must file a written demand for one with its answer. BAE Systems Controls is entitled to be represented by counsel or other authorized representative who has power of attorney to represent it. *See* 15 C.F.R. §§ 766.3(a) and 766.4. Under the Small Business Regulatory Enforcement Flexibility Act, BAE Systems Controls may be eligible for assistance from the Office of the National Ombudsman of the Small Business Administration in this matter.[6]

BAE Systems Controls may also seek settlement without a hearing. *See* 15 C.F.R. 766.18. Should BAE Systems Controls have a proposal to settle this case, BAE Systems Controls should transmit it to the attorney representing BIS named below.

The U.S. Coast Guard is providing administrative law judge services, to the extent that such services are required under the Regulations, in connection with the matters set forth in this letter. Therefore, in accordance with the instructions in Section 766.5(a) of the Regulations, BAE Systems Controls' answer should be filed with:

U.S. Coast Guard ALJ Docketing Center
40 South Gay Street
Baltimore, Maryland 21202-4022
Attention: Administrative Law Judge

Also, in accordance with the instructions in Section 766.5(b) of the Regulations, a copy of BAE Systems Controls' answer should be served on BIS at the following address:

Office of the Chief Counsel for Industry and Security
U.S. Department of Commerce
Room H-3839
14th Street & Constitution Avenue, NW
Washington, D.C. 20230

[6] To determine eligibility and get more information, please see: http://www.sba.gov/ombudsman/.

Sydney Jolliffe is the attorney representing BIS in this case; any communications that BAE Systems Controls may wish to have concerning this matter should occur through her. She may be contacted by email at sjolliffe@doc.gov.

Sincerely,

Reginald Duvel
Acting Director
Office of Antiboycott Compliance

Enclosures

TABLE A
Schedule of Alleged Violations of the EAR
FAILURE TO REPORT RECEIPT OF BOYCOTT REQUESTS

BAE SYSTEMS CONTROLS, INC.
Case No. 26-06

Item #	Reference (PO #)	Date Request Received	Date Reporting Violation*	Source of Boycott Request	Boycott Request
1	21748151-12[A]	2019-07-03	2019-10-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"
2	21748151-12[B]	2019-07-03	2019-10-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"
3	21749809-12	2019-07-07	2019-10-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"
4	21749691-13	2019-07-07	2019-10-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"
5	21753754-12	2019-07-17	2019-10-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"
6	21756231-12	2019-07-24	2019-10-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"

* As provided in Section 760.5(b)(4)(i) of the Regulations, where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked or electronically date-stamped by the last day of the month following the calendar quarter in which the request was received.

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7	21760416-12	2019-08-04	2019-10-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"
8	21773426-12	2019-09-09	2019-10-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"
9	21779149-12	2019-09-24	2019-10-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"
10	21803585-12	2019-11-26	2020-01-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"
11	21808972-12	2019-12-09	2020-01-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"
12	21816438-16	2019-12-29	2020-01-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"

* As provided in Section 760.5(b)(4)(i) of the Regulations, where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked or electronically date-stamped by the last day of the month following the calendar quarter in which the request was received.

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BAE SYSTEMS CONTROLS, INC.
Case No. 26-06

Item #	Reference (PO #)	Date Request Received	Date Reporting Violation*	Source of Boycott Request	Boycott Request
13	21854665-1	2020-04-16	2020-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
14	21856830-1	2020-04-27	2020-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
15	21856830-2	2020-04-27	2020-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
16	21856209-1	2020-04-28	2021-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
17	21866479-1	2020-06-16	2021-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
18	21867294-1	2020-06-29	2021-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"

* As provided in Section 760.5(b)(4)(i) of the Regulations, where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked or electronically date-stamped by the last day of the month following the calendar quarter in which the request was received.

TABLE A
Schedule of Alleged Violations of the EAR
FAILURE TO REPORT RECEIPT OF BOYCOTT REQUESTS

BAE SYSTEMS CONTROLS, INC.
Case No. 26-06

Item #	Reference (PO #)	Date Request Received	Date Reporting Violation*	Source of Boycott Request	Boycott Request
19	21872706-1	2020-07-15	2020-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
20	21877421-12	2020-08-04	2020-10-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"
21	21881427-1	2020-08-23	2020-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
22	21883578-1	2020-08-30	2020-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
23	21887131-1	2020-09-13	2020-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
24	21892995-1	2020-10-04	2021-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"

* As provided in Section 760.5(b)(4)(i) of the Regulations, where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked or electronically date-stamped by the last day of the month following the calendar quarter in which the request was received.

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BAE SYSTEMS CONTROLS, INC.
Case No. 26-06

Item #	Reference (PO #)	Date Request Received	Date Reporting Violation*	Source of Boycott Request	Boycott Request
25	21894606-1	2020-10-11	2021-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
26	21898204-1	2020-10-22	2021-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
27	21900630-1	2020-11-01	2021-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
28	21905422-1	2020-11-17	2021-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
29	21907654-12	2020-11-24	2021-01-31	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"
30	21907654-1	2020-11-24	2021-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"

* As provided in Section 760.5(b)(4)(i) of the Regulations, where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked or electronically date-stamped by the last day of the month following the calendar quarter in which the request was received.

TABLE A
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BAE SYSTEMS CONTROLS, INC.
Case No. 26-06

Item #	Reference (PO #)	Date Request Received	Date Reporting Violation*	Source of Boycott Request	Boycott Request
31	21907687-1	2020-11-25	2021-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
32	21907992-1	2020-11-29	2021-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
33	21916338-1	2020-12-28	2021-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
34	21924418-12	2021-01-24	2021-04-30	Qatar	"PLEASE NOTE THAT PARTS MADE IN ISRAEL IS [SIC] PROHIBITED…"
35	21932371-1	2021-02-23	2021-04-30	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
36	21932371-2	2021-02-23	2021-04-30	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"

* As provided in Section 760.5(b)(4)(i) of the Regulations, where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked or electronically date-stamped by the last day of the month following the calendar quarter in which the request was received.

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FAILURE TO REPORT RECEIPT OF BOYCOTT REQUESTS

BAE SYSTEMS CONTROLS, INC.
Case No. 26-06

Item #	Reference (PO #)	Date Request Received	Date Reporting Violation*	Source of Boycott Request	Boycott Request
37	21936087-1	2021-03-09	2021-04-30	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
38	21937413-1	2021-03-16	2021-4-30	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
39	21959084-1	2021-06-09	2021-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
40	21968344-1	2021-07-13	2021-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
41	21977452-1	2021-08-22	2021-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
42	21997153-1	2021-10-26	2022-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"

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TABLE A
Schedule of Alleged Violations of the EAR
FAILURE TO REPORT RECEIPT OF BOYCOTT REQUESTS

BAE SYSTEMS CONTROLS, INC.
Case No. 26-06

Item #	Reference (PO #)	Date Request Received	Date Reporting Violation*	Source of Boycott Request	Boycott Request
43	22001403-1	2021-11-11	2022-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
44	22002191-1	2021-11-14	2022-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
45	22009804-1	2021-12-13	2022-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
46	22017059-1	2022-01-12	2022-04-30	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
47	22017059-2	2022-01-12	2022-04-30	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
48	22020094-1	2022-01-25	2022-04-30	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"

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Case No. 26-06

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49	22021045-1	2022-01-30	2022-04-30	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
50	22030878-1	2022-03-06	2022-04-30	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
51	22034124-1	2022-03-16	2022-04-30	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
52	22037811-1	2022-04-04	2022-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
53	22043392-1	2022-05-10	2022-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
54	22053095-1	2022-05-29	2022-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"

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55	22055871-1	2022-06-05	2022-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
56	22056629-1	2022-06-09	2022-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
57	22061450-1	2022-06-28	2022-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
58	22064141-1	2022-07-07	2022-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
59	22065741-1	2022-07-13	2022-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
60	22067246-1	2022-07-19	2022-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"

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BAE SYSTEMS CONTROLS, INC.
Case No. 26-06

Item #	Reference (PO #)	Date Request Received	Date Reporting Violation*	Source of Boycott Request	Boycott Request
61	22070282-1	2022-07-31	2022-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
62	22075721-1	2022-08-16	2022-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
63	22076151-1	2022-08-18	2022-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
64	22076281-1	2022-08-18	2022-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
65	22081641-1	2022-09-05	2022-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
66	22081641-2	2022-09-05	2022-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"

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BAE SYSTEMS CONTROLS, INC.
Case No. 26-06

Item #	Reference (PO #)	Date Request Received	Date Reporting Violation*	Source of Boycott Request	Boycott Request
67	22088820-1	2022-09-29	2022-10-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
68	22105152-1	2022-11-16	2023-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
69	22135111-1	2023-02-28	2023-04-30	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
70	22137714-1	2023-03-08	2023-04-30	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
71	22144147-1	2023-04-02	2023-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
72	22158895-1	2023-05-18	2023-07-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"

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BAE SYSTEMS CONTROLS, INC.
Case No. 26-06

Item #	Reference (PO #)	Date Request Received	Date Reporting Violation*	Source of Boycott Request	Boycott Request
73	22226289-1	2023-12-12	2024-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
74	22226289-2	2023-12-12	2024-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
75	22226289-3	2023-12-12	2024-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
76	22226289-4	2023-12-12	2024-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
77	22226289-5	2023-12-12	2024-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
78	22226289-6	2023-12-12	2024-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"

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Case No. 26-06

Item #	Reference (PO #)	Date Request Received	Date Reporting Violation*	Source of Boycott Request	Boycott Request
79	22226289-7	2023-12-12	2024-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
80	22226289-8	2023-12-12	2024-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"
81	22226289-9	2023-12-12	2024-01-31	Qatar	"ACCORDING TO THE STATE OF QATAR LAW N12-1963, THE COMPONENT MADE IN ISRAEL IS PROHIBITED…"

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