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UNITED STATES OF AMERICA  
DEPARTMENT OF COMMERCE

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In the Matter of )  
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CACI INC. - COMMERCIAL )  
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Case No. 96-02

ORDER

The Office of Antiboycott Compliance, Bureau of Export Administration, U.S. Department of Commerce ("Department"), having determined to initiate administrative proceedings pursuant to Section 11(c) of the Export Administration Act of 1979, as amended (50 U.S.C.A. app. §§ 2401-2420 (1991 and Supp. 1996))<sup>1</sup> (the "Act"), and the Export Administration Regulations (15 C.F.R. Parts 768-799 (1995), as amended (61 Fed. Reg. 12714 (March 25, 1996)))<sup>2</sup> (the "Regulations"), against CACI Inc. - Commercial

<sup>1</sup>/ The Act expired on August 20, 1994. Executive Order 12924 (3 C.F.R., 1994 Comp. 917 (1995)), extended by Presidential Notices of August 15, 1995 (3 C.F.R., 1995 Comp. 501 (1996) and August 14, 1996 (61 Fed. Reg. 42527, August 15, 1996), continued the Regulations in effect under the International Emergence Economic Powers Act (50 U.S.C.A. §§ 1701-1706 (1991 & Supp. 1996)).

<sup>2</sup>/ The relevant events occurred in 1991 and 1992. The governing Regulations are found in the 1991 and 1992 versions of the Code of Federal Regulations (15 C.F.R. Parts 768-799 (1991 and 1992)). Those Regulations are referred to hereinafter as the former Regulations. Since that time the Regulations have been reorganized and restructured; the restructured regulations are to be codified at 15 C.F.R. Parts 730-774.

("CACI"), a domestic concern resident in the State of Virginia, based on the allegations set forth in the Proposed Charging Letter, dated February 24, 1997, attached hereto and incorporated herein by this reference;

The Department and CACI, having entered into a Settlement Agreement, incorporated herein by this reference, whereby they have agreed to settle this matter in accordance with the terms and conditions set forth therein, and the terms of the Settlement Agreement having been approved by me;

IT IS THEREFORE ORDERED THAT,


FIRST, CACI shall pay a \$15,000 civil penalty to the Department, in complete settlement of this matter, within forty five days of the service of this Order, when entered, as specified in the attached instructions;

SECOND, as authorized by Section 11(d) of the Act, the timely payment of the civil penalty assessed herein is hereby made a condition of the granting, restoration or continuing validity of any export license, permission or privilege granted, or to be granted, to CACI. Accordingly, if CACI should fail to pay in a timely manner the civil penalty assessed against it, the undersigned will enter an Order under the authority of Section

611-3

11(d) of the Act denying all of CACI's export privileges for a period of one year from the date of the entry of this Order; and

THIRD, the Proposed Charging Letter, the Settlement Agreement and this Order shall be made available to the public and a copy of this Order shall be served upon CACI. This Order, which constitutes the final agency action in this matter, is effective immediately.

  
John Despres  
Assistant Secretary  
for Export Enforcement

Entered this 20 day of FEBRUARY, 1997.

671-4

- 4 -

INSTRUCTIONS FOR PAYMENT OF CIVIL PENALTY

1. The check should be made payable to:

U. S. Department of Commerce

2. The check should be sent to:

Mr. Jack Floyd  
Room H-6622  
Export Enforcement Team  
Bureau of Export Administration  
U.S. Department of Commerce  
14th Street & Constitution Ave., NW.  
Washington, D.C. 20230

611-5

UNITED STATES OF AMERICA  
DEPARTMENT OF COMMERCE

In the Matter of  
CACI Inc. - Commercial

Case No. 96-02

SETTLEMENT AGREEMENT

This agreement is made by and between CACI Inc. - Commercial ("CACI") and the United States Department of Commerce, pursuant to Section 766.18 of the Export Administration Regulations (15 C.F.R. Parts 768-799 (1995), as amended (61 Fed. Reg. 12714 (March 25, 1996))<sup>1</sup> (the "Regulations"), issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C.A. app. §§ 2401-2420 (1991 & Supp. 1996))<sup>2</sup> (the "Act").

<sup>1</sup> The relevant events occurred in 1991 and 1992. The governing Regulations are found in the 1991 and 1992 versions of the Code of Federal Regulations (15 C.F.R. Parts 768-799 (1991 and 1992)). Those Regulations are referred to hereinafter as the former Regulations. Since that time, the Regulations have been reorganized and restructured; the restructured Regulations are to be codified at 15 C.F.R. Parts 730-774.

<sup>2</sup> The Act expired on August 20, 1994. Executive Order 12924 (3 C.F.R., 1994 Comp. 917 (1995)), extended by Presidential Notices of August 15, 1995 (3 C.F.R., 1995 Comp. 501 (1996)) and August 14, 1996 (61 Fed. Reg. 42527, August 15, 1996), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C.A. §§1701-1706 (1991 & Supp. 1996)).



WHEREAS, the Office of Antiboycott Compliance, Bureau of Export Administration, U.S. Department of Commerce ("Department"), has notified CACI of its intention to initiate an administrative proceeding against it pursuant to Section 11(c) of the Export Administration Act of 1979 (the "Act"), by issuing the Proposed Charging Letter, dated February 24, 1997, a copy of which is attached hereto and incorporated herein by this reference, alleging that CACI violated Part 769 of the former Regulations, promulgated to implement the Act;

WHEREAS, CACI has reviewed the Proposed Charging Letter and is aware of the allegations against it and the administrative sanctions which could be imposed against it, if the allegations were found to be true; CACI fully understands the terms of this Settlement Agreement, and enters into this Settlement Agreement voluntarily and with full knowledge of its rights; and CACI states that no promises or representations have been made to it other than the agreements and considerations herein expressed;

WHEREAS, CACI wishes to settle and dispose of the allegations made in the Proposed Charging Letter by entering into this Settlement Agreement; and

WHEREAS, CACI agrees to be bound by the appropriate Order ("Order") when entered;

NOW THEREFORE, CACI and the Department agree as follows:

