The State Department issued an order administratively de barring LeAnne Lesmeister, former compliance officer at Honeywell International, Inc. (Honeywell), from participating in any activities that are subject to the International Traffic in Arms Regulations (ITAR) (22 C.F.R. parts 120-130) for violations of the Arms Export Controls Act (AECA) (22 U.S.C. § 2778) and the ITAR.

Honeywell voluntarily disclosed to the Department numerous ITAR violations carried out by Ms. Lesmeister, its senior export compliance officer in Clearwater, Florida, between 2008 and 2012. Ms. Lesmeister, who had worked in export compliance at Honeywell for twenty-seven years, used her position to circumvent Honeywell’s export compliance program in the fabrication of various export control documents that Ms. Lesmeister presented as Department of State authorizations. Relying on these falsified authorizations, Honeywell exported defense articles, including technical data, and provided defense services to various foreign persons without Department approval in violation of the AECA and ITAR.

The State Department’s Office of Defense Trade Controls Compliance in the Bureau of Political-Military Affairs performed an extensive compliance review of the disclosed violations. The results of that review indicated no direct harm to U.S. foreign policy or national security. The nature of the violations, however, prompted the Deputy Assistant Secretary for Defense Trade Controls in the Bureau of Political-Military Affairs to formally charge Ms. Lesmeister with twenty-one violations of the AECA and ITAR in connection with her creation and use of Department authorizations, containing false statements or omitting and misrepresenting material facts for the purpose of exporting, retransferring, or furnishing defense articles, technical data, or defense services, and causing the unauthorized export of technical data and provision of defense services.

This administrative debarment is the result of the Department’s first institution of an administrative proceeding by referral of a charging letter before an Administrative Law Judge for consideration pursuant to ITAR § 128.4. The referral and debarment followed Ms. Lesmeister’s failure to answer the formal charges.

Acknowledging the serious nature of the violations, Honeywell cooperated fully with the Department’s review and implemented remedial measures to resolve the conditions that allowed the misconduct of one employee, in a position of authority, to bring about significant export compliance violations.

This administrative proceeding highlights the range of potential penalties that may be imposed by the Department on entities or individuals for ITAR violations. Individuals, if found culpable, may not be shielded by their employers for their independent violations. Those persons tasked with an entity’s export responsibilities, should be vigilant in their compliance with all export control regulations.

Under the terms of the administrative debarment, Ms. Lesmeister will be prevented from participating directly or indirectly in any activities that are subject to ITAR for a period of three years and until an application for reinstatement is submitted and approved by the Department. The Department determined that civil penalties were not appropriate at this time.

The Administrative Debarment Order and related documents will be available for public inspection in the Public Reading Room of the Department of State and on the Directorate of Defense Trade Controls website at http://www.pmddtc.state.gov/compliance/debar_admin.html

For additional information, please contact the Bureau of Political-Military Affairs’ Office of Congressional and Public Affairs at PM-CPA@state.gov.