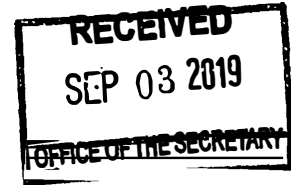


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**UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION**

**ADMINISTRATIVE PROCEEDING  
File No. 3-17950**

**In the Matter of  
  
David Pruitt, CPA  
  
Respondent.**

**JOINT STIPULATIONS AS TO FACTS AND LAW**

The Division of Enforcement and Respondent David Pruitt jointly submit the following stipulations as to facts and law:

**L3**

- 1.o L3 Communications Holdings, Inc. ("L3 Holdings") was, between 1997 and 2016, a Delaware corporation with its principal place of business in New York, NY.
- 2.o In 2013 and 2014, among other years, L3 Holdings derived all of its operating income and cash flows from its wholly owned subsidiary, L-3 Communications Corporation ("L3").
- 3.o In 2013 and 2014, among other years, the common stock of L3 Holdings was traded on the New York Stock Exchange (ticker: LLL).
- 4.o In 2013 and 2014, among other years, L3 Holdings securities were registered with the Securities Exchange Commission ("SEC") pursuant to Section 12(b) of the Securities Exchange Act of 1934.
- 5.o In 2013 and 2014, among other years, L3 was comprised of various segments.o

Following a reorganization of segments in the first quarter of 2014, those segments comprised of: Aerospace Systems; Electronic Systems; Communication Systems; National Security Solutions.

6.o Aerospace Systems, according to L3's public filings was responsible for delivering integrated solutions for the global intelligence market and providing maintenance and logistics support for a wide variety of aircraft and ground systems.

7.o Each of L3's business segment was, in 2013 and 2014 among other years, comprised of multiple business "sectors," and each business sector is comprised of multiple business "divisions."

8.o The Logistics Solutions sector of Aerospace Systems provided, among other things, logistics support and aircraft maintenance services to its military customers, and ASD provided support for United States Army aircraft at bases throughout the United States and around the world including several presidentially designated combat zones.

9.o L3's 2013 fiscal year ended on December 31, 2013.o

10.o L3's 2014 fiscal first quarter ended on March 31, 2014.o

#### **C-12 Contracto**

11.o The C-12 Contract had a five-year term, commencing on June 2, 2010, and ending on January 31, 2015, with the partial initial year referred to as a "base year" and each subsequent twelve-month period referred to as an "option year."

#### **Respondent**

12.o Respondent is a resident of Owens Cross Roads, AL.o

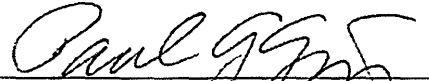
13.o Respondent began working for L3 in 2003.o

Dated: August 30, 2019  
New York, NY

Respectfully submitted,

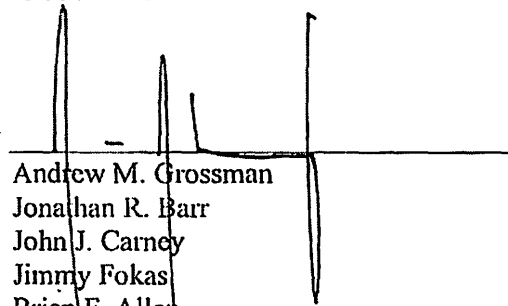
DIVISION OF ENFORCEMENT

By:



Janna I. Berke (berkej@sec.gov)  
Paul G. Gizzi (gizzip@sec.gov)  
Steven G. Rawlings (rawlingss@sec.gov)  
Alexander M. Vasilescu (vasilescua@sec.gov)  
Securities and Exchange Commission  
200 Vesey Street, Suite 400  
New York, NY 10281  
212-336-1100

By:



Andrew M. Grossman  
Jonathan R. Barr  
John J. Carney  
Jimmy Fokas  
Brian F. Allen  
Bari R. Nadworny  
BAKER & HOSTETLER LLP  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: 212.589.4200  
Facsimile: 212.589.4201

*Attorneys for Respondent David Pruitt*