Global Acquisitions
U.S. DEPARTMENT of STATE

JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION

SECTION 1: IDENTIFICATION OF THE AGENCY AND THE CONTRACTING ACTIVITY

Department of State Contracting Activity	☒ Office of Global Acquisitions, Regional Procurement Support Office Frankfurt
Requiring Activity	INL Beirut, Lebanon

SECTION 2: NATURE AND/OR DESCRIPTION OF THE ACTION BEING APPROVED

Approval is requested to solicit and award on a sole-source basis a contract to Prime Source Technologies, LLC (PST), 1825 K St NW, Washington, DC 20006, for the supplies and/or services described in Section 3 on behalf of the Requiring Activity.

Contract type Firm-Fixed-Price (FFP)

SECTION 3: DESCRIPTION OF SUPPLIES/SERVICES REQUIRED TO MEET THE AGENCY'S NEEDS

This requirement is for an IT Infrastructure Upgrade for Internal Security Forces of Lebanon on behalf of International Narcotics and Law Enforcement (INL) Beirut, as detailed below.

The requirement provides critical infrastructure upgrades for the Lebanese Internal Security Forces (ISF) Data Center. This Data Center houses an array of servers and routers which run software supporting the IT Automation Project (ITAP) and several additional mission-critical ISF systems that operate on obsolete hardware infrastructure. This infrastructure upgrade must migrate all functions to a new array of hardware and software that successfully maintains operational continuity of systems supporting daily law enforcement operations for up to 30,000 ISF personnel across 300+ ISF user entities (police stations, barracks, academy, etc) who depend on instant access to criminal records, personnel information, and operational data to perform their duties.

Comprehensive ISF Digital Infrastructure at Risk: The infrastructure upgrade will support not only ITAP systems but also additional mission-critical ISF systems:

- ITAP – Digital case management system that enables ISF (and all other security services to include Lebanese Armed Forces) to conduct police activities that include background checks, be on the lookout reports, and investigations. This system has prevented terrorists from departing Lebanon, identified members of Hizballah for arrest, and provides Lebanese and U.S. citizens the ability to do anything that requires a background check to include getting a drivers license or registering a business.
- Criminal Records System - national repository for court documents and judicial rulings;
- Prison Management System (BASEM) - centralized inmate record management and judicial coordination;
- Weapons and Armory Management System - tracking weapons, ammunition, and tactical equipment inventory.
- Payroll System - managing salaries and allowances for all active and retired ISF personnel;
- Fuel Management System - controlling distribution and tracking across the entire ISF vehicle fleet (over 6,000);
- ISF Website and Mobile Application - public interface for citizen services and recruitment; an
- Traffic Ticket Management System - enabling violation ticketing and payment tracking;
- Healthcare Management System - managing medical approvals and health card issuance for ISF families;
- Point-of-Sale (POS) System - supporting transactions at ISF facilities and canteens;
- Reserve Fund System - overseeing allocation of emergency and operational funds;

The infrastructure upgrade includes:

- Hardware replacement and modernization for aging Dell/EMC equipment that exceeded end-of-life support, as well as telecommunications and network switches
- Network infrastructure enhancements to support expanded operations across 300+ ISF entities
- Software licensing and integration to maintain system compatibility and security
- Technical implementation and migration services to maintain business continuity during upgrades

This infrastructure enables mission-critical capabilities that have eliminated 40% of administrative staff requirements, reduced process execution time from 40 days to a single day, and provide critical decision-making information that ISF leadership uses to deploy resources, track performance, manage personnel, and coordinate with other Lebanese security agencies in alignment with INL's priorities to degrade and dismantle transnational criminal organizations.

The estimated value for the entire is $19,000,000.00.
Period of performance: 24 months.

SECTION 4: IDENTIFICATION OF THE STATUTORY AUTHORITY PERMITTING OTHER THAN FULL AND OPEN COMPETITION

This acquisition is conducted under the authority of 41 USC 3304, as implemented by FAR 6.103 and substantiated by the following:

☐ FAR 6.103-2 – Unusual and compelling urgency.

SECTION 5: DEMONSTRATION THAT THE PROPOSED CONTRACTOR'S UNIQUE QUALIFICATIONS OR THE NATURE OF THE ACQUISITION REQUIRES USE OF THE AUTHORITY CITED

1. **Critical Urgency**

Mission-Critical Urgency: The infrastructure upgrade is essential to support ISF's role in preventing terrorist organizations like Hezbollah from exploiting regional instability during the post-Assad era in Syria. Time-sensitive implementation is required before renewed hostilities halt progress, as this highly sensitive system containing detailed data on all Lebanese citizens, including criminals and terrorists, requires continued U.S. oversight and control while supporting Lebanon's newly elected government and enhancing regional security cooperation in this vulnerable period. As the existing hardware reached end-of life, a **total system failure is imminent.** If the data center collapses, the vast majority of the ISF will lose **all digital operational capabilities** simultaneously. In such a situation ISF cannot issue arrest warrants against criminals and terrorists who would do harm to the United States; airport immigration officials will not have any information from the ISF about whom to seize and arrest; ISF cannot otherwise stop Hizballah from exploiting security vulnerabilities.

The Lebanese Armed Forces relies in part on the information technology housed in the ISF Data Center, without which the ISF could not communicate electronically or carry out any digital processes. The entire spectrum of electronically managed functions would be severely disrupted: fuel cannot be distributed to patrol vehicles, inmates cannot be processed, weapons

accountability disappears, officers cannot receive salaries, traffic violations cannot be issued, medical care approvals halt. No disaster recovery capabilities exist. This represents a **complete institutional breakdown** affecting every aspect of ISF operations and cripples a key partner to stop transnational criminals and terrorists who would do harm to the United States, including through illegal drug trade.

Counterterrorism Operations at Risk: ISF operations are essential for counterterrorism efforts and preventing terrorist organizations from rearming during this unstable period, with the U.S. Government serving as the only partner providing critical infrastructure support to Lebanese security forces. Infrastructure failures directly threaten ISF's ability to fight crime, solve cases, and interact with citizens during this vulnerable time.

Regional Security Crisis: This requirement is essential in a highly unstable and difficult geopolitical area. Following the most recent conflict in the south, a cessation of hostilities was announced between Lebanon and Israel. This arrangement has created an unusual and time-limited period of relative calm during which, for the first time, direct negotiations are taking place between the two countries. The current window offers an opportunity to advance stabilization efforts and support the Internal Security Forces in extending the reach of state institutions across Lebanese territory, helping reinforce the role of formal governance structures during this sensitive phase The Lebanese Armed Forces (LAF) redeployment operations and nonestate players disarmament requested from the LAF require fully functional ISF systems for coordination and security during this fragile transition period.

Economic Crisis and Government Constraints: Lebanon's currency devaluation exceeding 2000% limits ISF's ability to maintain systems independently, while the economic situation impacts ISF personnel productivity with many officers working reduced schedules due to fuel shortages and power outages. Lebanon's economic situation over recent years has left the ITAP system vulnerable to influence from adversaries seeking to exploit the ISF, making U.S. Government support the only viable option to maintain critical infrastructure.

2. **Proven Track Record and Exceptional Performance**

PST originally designed, developed, and implemented the entire ITAP system under the competitively awarded ITAP Contract (19AQMM18C0131) in July 2018, and has successfully delivered exceptional performance on multiple follow-on INL contracts in Lebanon. As the

original system designer, PST built the foundational software architecture, configured applications, and established the integrated systems that currently support Lebanon's Internal Security Forces' critical law enforcement operations. PST has received "Exceptional" ratings across all performance categories in multiple Contractor Performance Assessment Reports (CPARs), demonstrating consistent excellence under challenging conditions.

3. **Risk Mitigation and Cost Avoidance**

Changing contractors would cause unacceptable delays and cost to the Government. Any transition to a new contractor would require a minimum 12-month learning curve and large financial costs to duplicate PST's existing knowledge base and relationships, while critical infrastructure continues to deteriorate. The risk mitigation and cost avoidance achieved through PST's contractor continuity far outweighs any potential benefits of competition under these emergency circumstances.

4. **Irreplaceable Institutional Knowledge and System Complexity**

PST possesses irreplaceable institutional knowledge developed over 7 years of intensive collaboration with ISF, including deep understanding of ISF's 100-year-old institutional structure and operational requirements across 400+ entities. PST has established trust relationships with ISF members and officers through years of on-site presence and complete knowledge of existing infrastructure architecture.

5. **Intimate Knowledge of System Vulnerabilities**

Through years of crisis management, PST has developed irreplaceable knowledge of:

- Which system components fail frequently and how to work around them
- What infrastructure configurations actually work versus theoretical specifications
- How ISF personnel adapt operations when technology fails—this is unique not only to Lebanon but the ISF specifically
- Which processes can tolerate downtime and which require immediate response
- Real-world performance limitations of aging equipment under stress
- Recent experience building data centers to support security institutions in Lebanon.

6. **System Interdependence Complexity**

The ISF systems are tightly interconnected - personnel data from the HR system links to fuel allocations, criminal records connect to court processing, payroll integrations with health benefits, and weapons tracking coordinates with personnel assignments. Any disruption cascades across all systems, requiring deep understanding of these relationships that only PST possesses. This infrastructure upgrade represents a direct follow-on to PST's existing contracts, requiring seamless migration of PST's originally created systems to new hardware while maintaining operational continuity.

SECTION 6. DESCRIPTION OF EFFORTS TO ENSURE THAT OFFERS WERE SOLICITED FROM AS MANY POTENTIAL SOURCES AS IS PRACTICABLE, INCLUDING WHETHER A NOTICE WAS OR WILL BE PUBLICIZED AS REQUIRED BY FAR SUBPART 5.2 AND, IF NOT, WHICH EXCEPTION UNDER FAR 5.201 APPLIES

IAW FAR 5.101(b)(2) a notice will not be publicized.

SECTION 7. DETERMINATION BY THE CONTRACTING OFFICER THAT THE ANTICIPATED COST TO THE GOVERNMENT IS FAIR AND REASONABLE

The Contracting Officer has determined the anticipated $19,000,000.00 to the Government of the supplies/services covered by this J&A will be fair and reasonable based on market prices, historical prices as well as GSA pricing agreements; By signing the justification, the Contracting Officer makes a determination that the $19,000,000.00 to the Government is expected to be fair and reasonable.

INL Beirut, in collaboration with the ISF IT Department, conducted extensive research, as detailed below:

1. Software Licensing ($9M): Validated against Oracle's published Standard Price List. PST's 80% effective discount — achieved through a strategic in-country partnership with Oracle's Lebanon account team and Ingram Micro (AD) — exceeds the publicly documented 75% GSA-Oracle OneGov government-wide benchmark. This discount is unique to PST and unavailable to any alternative contractor, saving the Government a minimum of $4.6M on software alone.
2. Integration Services ($6.5M): PST's blended rate of $130/hour falls below the low end of GSA IT Schedule 70 rates ($150–$250/hr) and significantly below Oracle's direct professional services rates ($200–$300/hr). This below-market rate is achievable through PST's established locally employed workforce in Lebanon, eliminating the premium rates associated with deploying U.S.-based or third-country technical personnel to a conflict-affected environment.

3. Hardware Procurement ($3.5M): Validated against current regional Dell/EMC enterprise pricing and confirmed by comparable public-sector Oracle deployments in UAE, KSA, and Eastern Europe within the $2M–$5M range. The fixed-price scope includes 5-year support, international shipping, customs, and installation.
4. Cost Avoidance ($7M+ validated at $7.6M+ minimum): Quantified through Oracle discount differential ($4.6M at best-case alternative) and knowledge transfer elimination ($3M+).
5. Historical Pricing: Consistent with competitively awarded 2018 baseline contract values. PST's $130/hr blended rate represents only a 7% increase over the most recent contract rate in 2024 ($121.81/hr), well within normal annual escalation.
6. Performance Value: Five consecutive Exceptional CPAR ratings across all categories validate superior value delivery at established pricing levels.

SECTION 8. DESCRIPTION OF THE MARKET RESEARCH CONDUCTED (SEE PART 10) AND THE RESULTS OR A STATEMENT OF THE REASON MARKET RESEARCH WAS NOT CONDUCTED

The current ISF Data center is out of shelf life and out of support. The ISF is running under very high risk of security systems failure. The need to upgrade the Data Center that caters to all security agencies in the Lebaneses Government is very urgent and paramount. The high risk of system failure should be mitigated urgently, daily policing, ports of entry, and antiterrorism operations all rely on the ISF Data Center for the Criminal Case management systems it offers and its security data sharing. Any alternative contractor would require more than 12 months for ISF relationship development and system understanding, over 3 million in knowledge transfer costs, high risk of system failures during transition, loss of Oracle partnership, pricing potentially increasing costs by 7 million, and potential security breaches during contractor transition.

Market research indicates that while other contractors might possess general IT infrastructure capabilities, none possess the specific combination of requirements necessary for this critical infrastructure upgrade. No other contractor has access to the established system knowledge, ISF institutional relationships built over years, existing security clearances and vetting for Lebanese operations, proven crisis operations experience, or Oracle partnership benefits providing significant cost savings.

SECTION 9. ANY OTHER FACTS SUPPORTING THE USE OF OTHER THAN FULL AND OPEN COMPETITION

Exceptional Performance History

PST has consistently delivered exceptional performance under challenging conditions, including maintaining operations during the 2020 Beirut Port explosion, COVID-19 lockdowns,

regional war conditions in 2024-2025, and managing economic crisis impacts while maintaining system stability.

Strategic Partnership Value

PST maintains Oracle Gold Partnership providing direct vendor support and discounted licensing, Microsoft Silver Partnership for integrated solutions, Hexagon Business Partnership for specialized capabilities, and AWS Partnership for cloud infrastructure and security.

Operational Impact Evidence

Current systems supported by the infrastructure requiring upgrade have achieved automating essential ISF processes that previously required manual paperwork, enabling officers to focus on law enforcement rather than administrative tasks while maintaining accurate records for judicial proceedings, and providing critical decision-making information that ISF leadership uses to deploy resources, track performance, manage personnel, and coordinate with other Lebanese security agencies.

SECTION 10. LISTING OF THE SOURCES, IF ANY, THAT EXPRESSED, IN WRITING, AN INTEREST IN THE ACQUISITION

Due to the urgent nature of this requirement no other sources were sought.

SECTION 11. STATEMENT OF THE ACTIONS, IF ANY, THE AGENCY MAY TAKE TO REMOVE OR OVERCOME ANY BARRIERS TO COMPETITION BEFORE ANY SUBSEQUENT ACQUISITION FOR THE SUPPLIES OR SERVICES REQUIRED

At the conclusion of this infrastructure upgrade effort, the enhanced ITAP system will continue to require the specialized knowledge and relationships that PST has developed. The complex nature of the system architecture and critical security requirements of ISF operations will continue to necessitate PST's unique capabilities for ongoing support and maintenance. Future infrastructure needs will be assessed based on system evolution and ISF requirements, with consideration for competitive opportunities where feasible without compromising operational security or continuity.

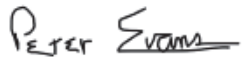
SECTION 12. CERTIFICATIONS

All reviews and approvals should be completed in the order listed unless otherwise authorized or required.

TECHNICAL AND REQUIREMENTS CERTIFICATION

I certify that the facts and representations under my cognizance which are included in this Justification and its supporting acquisition planning documents, except as noted herein, are complete and accurate to the best of my knowledge and belief.

Technical Cognizance:
SIGNATURE:



_____

Peter Evans
INL Director
U.S. Embassy Beirut

Requirements Cognizance:
SIGNATURE:

_____

Andra Balta
Contract Specialist
GA/AM/DMS/RPSO

CERTIFICATIONS (Continued)

CONTRACTING OFFICER CERTIFICATION (FAR 6.104-1(a)(12))
I certify that this submission is accurate to the best of my knowledge, and that it contains complete information necessary to enable other officials to make an informed recommendation for approval or disapproval.

SIGNATURE:

Travis C Keon
Digitally signed by Travis C Keon
Date: 2026.05.08 17:08:33 +02'00'

Travis Keon
Contracting Officer
GA/AM/DMS/RPSO

SIGNATURE:

Daniel J Jackson (Affiliate)
Digitally signed by Daniel J Jackson (Affiliate)
Date: 2026.05.11 11:33:48 -04'00'

Daniel Jackson
Division Director
GA/AM/DMS/RPSO

LEGAL SUFFICIENCY REVIEW
This J&A is hereby determined to be legally sufficient.

SIGNATURE:

John W Cox
Digitally signed by John W Cox
Date: 2026.05.13 09:13:21 -04'00'

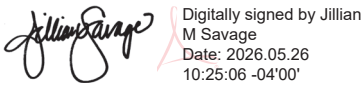
John Cox
Attorney-Adviser
L/BA

SECTION 13. APPROVALS

COMPETITION ADVOCATE SIGNATURE:

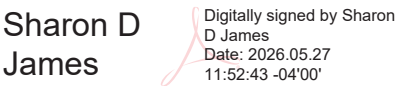
Trena Mills
Competition Advocate
Bureau of Global Acquisitions

HEAD OF THE CONTRACTING ACTIVITY SIGNATURE:



Jillian Savage
Deputy Head of Contracting Activity (Acting)
for Facilities
GA/AM/DMS/FAC

SENIOR PROCUREMENT EXECUTIVE OF THE AGENCY SIGNATURE:



Sharon James
Senior Procurement Executive
Bureau of Global Acquisitions