



JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION
41 USC 3304 (a): USE OF NONCOMPETITIVE PROCEDURES

J&A-26-0252

Pursuant to the requirements of the Competition in Contracting Act (CICA) as implemented by the Federal Acquisition Regulation (FAR) 6.103 (FAR Class Deviation 25-11¹) and in accordance with the requirements of RFO 6.104, the justification for the use of the statutory authority under RFO 6.103 is justified by the following facts and rationale required under RFO 6.104-1 as follows:

1. Agency and Contracting Activity.

The Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Office of Acquisition Management (OAQ), proposes to enter into a contract on behalf of the Office of Firearms and Tactical Program (OFTP) on a basis of other than full and open competition.

2. Nature and/or description of the action being approved.

(a) DHS ICE intends to procure on a sole source basis 6000 conductive distraction and de-escalation devices to incorporate a controlled, non-lethal capability designed to support de-escalation objectives, reduce reliance on higher levels of force where appropriate, and enhance officer and public safety when used in accordance with approved policy, training, and accountability standards.

(b) Compliant Technologies LLC
PO Box 24714
Lexington, KY 40524

(c) Contract Type: Firm Fixed Price Contract

(d) Estimated Total Value: \$16,700,640.00

Period		Product	Unit Price	Quantity	Total
Base Period	6 mo.	G.L.O.V.E. NR CD3	\$2,495.00	6,000	\$14,970,000.00
Base Period	6 mo.	G.L.O.V.E. CD3 TR	\$2,395.00	650	\$1,556,750.00

¹ FAR Class Deviation 25-11 is implemented as a result of Revolutionary FAR Overhaul, referred as RFO, following Executive Order 14275, *Restoring Common Sense to Federal Procurement*. All citations in this document follow applicable DHS RFO Deviations therefore are referred as RFO.



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Base Period	6 mo.	Glovestix Refill	\$15.00	6,650	\$99,750.00
Base Period	6 mo.	Tester	\$1,295.00	10	\$12,950.00
Base Period	6 mo.	Certification	\$299.00	10	\$2,990.00
Base Period	6 mo.	Disinfectant	\$8.00	6650	\$53,200.00
Base Period	6 mo.	Refresher/in	\$5,000.00	1	\$5,000.00
			Total		\$16,700,640.00

- (e) Type of funding: Operations and Support Funds
- (f) Year of funding: Fiscal Year 2025/2026 (OB 3 Funding)
- (g) Solicitation Number: 70CMSW26R00000013
- (h) Background information about the requirement:
ICE law enforcement officers conduct enforcement operations, custodial transportation of detainees, and respond to civil disturbances around detention facilities. While effectuating an arrest or removal, ICE officers often face non-cooperation and active resistance from individuals. ICE requires a low-impact tool for its officers and agents to utilize in cases where an individual is resisting arrest or otherwise represents a clear threat to officers and agents. ICE does not currently have an empty hand use of force device to provide to the field amidst unprecedented levels of threats and violence against ICE officers and agents to help ensure they can de-escalate tense situations before they turn violent.

3. Description of Supplies/Services.

ICE requires a non-lethal, de-escalation device intended to diffuse situations of high-stress environments where physical altercations are likely, such as field domestic disputes or inmate transport in jails. It will be used when a subject is actively or passively resisting and an officer needs to gain control quickly to prevent injuries to both parties. The agency will procure 6000 GLOVE units along with support equipment and services. The GLOVE is a conductive distraction and mitigation device to incorporate a controlled, non-lethal capability designed to support de-escalation objectives, reduce reliance on higher levels of force where appropriate, and enhance officer and public safety when used in accordance with approved policy, training, and accountability standards. This technology is vital to meeting mission demands, ensuring officer safety, and achieving the President's public safety and immigration enforcement priorities.



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4. Identification of statutory authority permitting other than full and open competition.

The statutory authority permitting other than full and open competition is 41 U.S.C. §3304 as implemented by:

- ☒ RFO 6.103-1: Only one responsible source and no other supplies or services will satisfy agency requirements.
- ☐ RFO 6.103-2: Unusual and compelling urgency.
- ☐ RFO 6.103-3: Industrial mobilization; engineering, development, or research capability; or expert services.
- ☐ RFO 6.103-4: International agreement.
- ☐ RFO 6.103-5: Authorized or required by statute.
- ☐ RFO 6.103-6: National security.
- ☐ RFO 6.103-7: Public interest.

5. Identification of Exception to the Buy American Statute

N/A

6. Demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires use of the authority cited.

(a) Rationale for using the authority cited in section 4 of the J&A.

ICE requires a non-lethal device that allows Agents/Officers to use "Soft Empty Hand" techniques to de-escalate a situation and secure handcuffs by briefly distracting a subject who is resisting or hiding their hands without transitioning to higher, more forceful levels of control such as batons, chemical/high-impact munitions or lethal force. ICE requires non-lethal device capable of being worn on the hands or carried by law enforcement personnel without interfering with law enforcement activities involving the hands. The devices shall have the following technical specifications:

Minimum Technical specifications:

Device Type: Conductive Distraction and De-Escalation Device.

Weight: device shall not exceed 23 oz.



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Activation: device shall have a deliberate activation mechanism on the device under the direct control of the authorized officer that activates the device ≤ 1 second and includes features or operational safeguards that reduce the likelihood of accidental activation.

Duration of Use: device shall have a usage duration time of 75 - 90 minutes dependent on environmental conditions.

Duration of Charge: 2 days to several months dependent on usage and storage conditions.

Battery type: device shall have rechargeable lithium-ion power source.

Charge Time: 1.5 - 2 hours.

Voltage: 324 to 362 volts.

Maximum Voltage: device shall have a voltage limitation not to exceed 380 volts.

Maximum Current: device shall emit a current between 0.7 to 1.2 amps.

Pulse Duration: device shall have a pulse duration of approximately 0.000115 seconds.

Pulse Charge: device shall emit pulse charges between 72.4 to 111.7 microcoulombs, approximately 0.000111 amp-seconds.

Pulse Repetition Rate: 25 to 30 pulses per second.

Duty Cycle: 0.348%.

Special Features: device shall have controlled method of activation, stand-by capability, visual power indicator, and other safeguards that support responsible use and accountability.

Operating Temperature: device shall be capable of operating within a reasonable range of field conditions 14°F to 122°F, or -10°C to 50°C.

IAW RFO 6.103-1, the agency's minimum needs can only be satisfied from one source, Compliant Technologies LLC, with the unique capability to offer the GLOVE, a wearable device, in the form of gloves, that functions as a Conducted Electrical Weapon (CEW) unlike traditional stun guns or Tasers that deploy probes, this device is designed specifically for direct physical contact. It utilizes conductive distraction and diffusion (CD3) technology when the device is activated and makes contact with bare skin, it delivers low-level electrical pulses. These pulses stimulate peripheral nerves to create a sensation of pain compliance and "neural peripheral interference." This effect disrupts a



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subject's ability to coordinate muscle movements, which can assist officers in controlling a combative or non-compliant individual without needing to use more severe force. These devices provide controlled options for high-tension environments, such as:

- Custodial and Transport- Providing a remote-controlled option to maintain control over inmates and prevent aggression or escape attempts.
- "Soft" Empty-Hand Control- Enabling officers to briefly distract a subject who is resisting or hiding their hands to secure handcuffs without transitioning to higher, more forceful levels of control.
- Civil Disturbance- Assisting crowd control units in moving groups or denying access to areas without requiring lethal or high-impact munitions.

The firm is the sole source manufacturer and provider of patented Conductive Distraction and De-escalation Devices. The low-level current delivered through these devices and the way it is delivered to interact with the body to provide neural peripheral interference is non-lethal, and proprietary. No other firm in the market can provide the same type of technology as Compliant Technologies LLC.

(b) Details covering what events lead to the situation requiring use of other than full and open competition procedures including whether any portion of the work can be segregated to allow for competition.

Market research efforts led to the conclusion that one specific G.L.O.V.E. NR CD3 model will meet ICE's requirements. This product is only available from one contractor/manufacturer, Compliant Technologies LLC.

No portion of the requirement (products, accessories, training, or support services) can be segregated to allow for competition as Compliant Technologies LLC is the sole manufacturer and reseller.

(c) Summarize alternatives considered and why they will not work.

Market research was conducted by Homeland Security Investigations (HSI) and Enforcement Removal Operations (ERO) to locate as many sources as possible that could provide technology to deliver low-voltage electrical pulses upon direct contact with bare skin, a conductive distraction and de-escalation device to meet the requirements. Only (1) open market source (none found on GSA Advantage) was identified that could meet the requirement. While there are other less-lethal technologies on the market (such as TASERS), the G.L.O.V.E. is marketed specifically for its ability to function as a normal patrol glove until activated, allowing for direct skin-contact stimulation. No other device in the marketplace has the same capabilities as the product provided by Compliant Technologies LLC.

(d) Impact to the mission that would result if the J&A is not approved and, consequently, the product or service is not provided.



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There would be a detrimental impact to the OFTP mission if the J&A was not approved for ICE officers/agents in the field would not have a viable device to de-escalate incidents which could lead to an increased reliance on physical force, impact on safety and community relations. Compliant Technologies LLC GLOVE devices give officers/agents an alternative to subdue a potential threat before the need to use their duty weapon. The health and safety of ICE officers/agents in the field would be at a higher risk if not approved.

7. Description of efforts made to ensure that offers are solicited from as many potential sources as is practicable.

Within 14 days following IDIQ award, DHS intends to post the approved/signed justification on www.SAM.gov, pursuant to FAR 6.302-1 on www.SAM.gov.

8. Determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable.

The contracting officer will determine that the anticipated price for the CTG-5 G.L.O.V.E will be fair and reasonable based on a review of requested quantity discounts from established market prices, assessment of included features, warranty, training, support, and lifecycle costs, and confirmation that the proposed price is consistent with the Government's technical requirements and expected operational value. Because the item is available from only one vendor, the determination also considered the vendor's sole-source position and the absence of comparable authorized suppliers.

9. Description of Market Research.

Market Research was conducted between mid-June 2026 and July 2026 in accordance with the RFO initiative and class deviation to Federal Acquisition Regulation (FAR) Part 10 for purposes of implementing the Federal Acquisition Regulatory Council's (the Council's) model deviation text to FAR Part 10. OFTP surveyed GSA Advantage and open market law enforcement sources to find any viable Generated Low Output Voltage Emitter equipment that could potentially satisfy the requirements in the list of specifications. Only (1) open market source (none found on GSA Advantage) was identified that could meet the requirement.

10. Any other facts supporting the use of other than full and open competition.

Not applicable.

11. A listing of the sources, if any that expressed, in writing, an interest in the acquisition.

No other firm relayed interest in the requirement.

[REDACTED]



U.S. Immigration
and Customs
Enforcement

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