



United States Department of State
Bureau of Political-Military Affairs
Directorate of Defense Trade Controls
Washington, D.C. 20522-0112

EBEN WALKER
President
GRAPHITE METALLIZING HOLDINGS, INC.
1050 NEPPERHAN AVENUE
Yonkers, NY, 10703

6/24/2020

REGISTRANT CODE: REDACTED
DATE: 3/31/2021

Reference: Manufacturer Registration Statement and Fee Submission

Dear EBEN WALKER:

The Office of Defense Trade Controls Compliance received your registration statement and fee to register as a manufacturer. We have reviewed your registration statement and your registration code is **REDACTED**, which expires on 3/31/2021.

Any person who engages in the United States in the business of either manufacturing or exporting defense articles or furnishing defense services is required to register and keep that registration current with this office pursuant to the Arms Export Control Act (AECA) and the International Traffic in Arms Regulations (ITAR Part 122). Registration serves as a precondition to submitting an application for an export license or other approval from the Directorate of Defense Trade Controls (DDTC), or to use export exemptions. This registration does not satisfy the requirements for registering as a broker pursuant to ITAR Part 129.

As you are the senior officer empowered to sign the registration statement, we ask you to maintain records consistent with ITAR Section 122.5 regarding: 1) The key senior officer listed on the registration who will oversee the compliance program and be responsible for designating the direct employees who will serve as “empowered officials” at their place of employment, and 2) A list of qualified, direct employees who will serve as “empowered officials” by name, position, business unit, phone and fax numbers and email addresses. Please note that third parties (individuals who are not direct employees, such as consultants, subcontractors or outside counsel, for example) cannot serve as “empowered officials.”

ITAR Section 122.5 requires you to maintain records concerning your registration and the manufacture, acquisition and disposition of defense articles; the provision of defense services; and information on political contributions, fees, or commissions furnished or obtained, as required by ITAR Part 130. Records maintained shall be available at all times for inspection and copying by this office or by Customs officials. To maintain such records, managers, supervisors and employees need appropriate training on AECA and ITAR requirements and must understand the individual and organizational ramifications of failure to comply. Ramifications may include shipment delay and/or shipment seizure by Customs and Border Protection, loss of export privileges, or criminal charges.

You may refer to the DDTC website for a Compliance Guide at <http://www.pmdtcc.state.gov/> and then click on the ITAR Compliance tab, next click on How to Comply tab. The DDTC website also includes a copy of the ITAR, explanations of export licensing procedures, how to submit a license

application, country sanctions, individuals / companies debarred by the Department of State, and other export matters. The website also includes procedures for requesting a commodity jurisdiction determination (ITAR Section 120.4) should you have questions on whether an article, services, or technical data is covered by the ITAR Part 121 (U.S. Munitions List).

Please include your registration code and the following statement on all registration correspondence to this office: “Under penalty according to federal law (22 CFR 127.2; 22 USC 2778; 18 USC 1001) I, [insert your name], as authorized by [name of company, if applicable] warrant the truth of the statements made herein.” We recommend submitting for registration renewal well in advance to ensure this office receives the request up to 45 day before registration expiration. Your registration must be received at least 30 days before the expiration date. Registration must be current to apply for export licenses or other approvals, or to use export exemptions. Your registration is not current, for example, if you have not notified this office of any material change in the information contained in your Registration Statement (ITAR Section 122.4).

For general registration related questions, please contact the DDTC Response Team at 202-663-1282 or by email at DDTCResponseTeam@state.gov. For questions related to this matter, please contact Monique Galloway at 202-632-2784.

Sincerely,

A handwritten signature in black ink that reads "Daniel Cook". The signature is written in a cursive style with a large initial "D" and "C".

Daniel Cook
Chief, Registration, Compliance, & Analysis