



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

Colleen Valerio
Chief Operating Officer
EMPIRE FASTENERS, LLC
49-07 69th Street
Woodside, NY 11377

2021-10-28

REGISTRANT CODE: K-5994
EXPIRATION DATE: 2022-10-31

Reference: Broker (US Person) Registration Statement and Fee Submission

Dear Colleen Valerio:

The Office of Defense Trade Controls Compliance received your registration statement and fee to register as a broker. We have reviewed your registration statement and your registration code is K-5994, which expires on 2022-10-31.

Section 38(b)(1)(A)(ii) of the Arms Export Control Act (AECA) (22 U.S.C. 2778) provides that persons engaged in the business of brokering activities with respect to the manufacture, export, import, or transfer of any U.S. or foreign defense article or defense service shall register and pay a registration fee and that no person may engage in the business of such brokering activities without a license issued in accordance with the AECA. This registration serves as a precondition to submitting an application for a brokering license or other approval from the Directorate of Defense Trade Controls (DDTC). Further, this registration does not satisfy any independent requirement to register as an exporter / manufacturer pursuant to International Traffic in Arms Regulations (ITAR) Part 122, if so required by the AECA or ITAR.

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."

As a registered broker you are required to comply with other sections of the ITAR as well as those specific to Part 129 on brokering activities. These include but are not limited to Parts 120, 121, 122, 126, 127 and 130. These Parts cover general authorities and eligibility, the United States Munitions List, Registration of Manufacturers and Exporters, Prohibited Exports and Sales to Certain Countries, Prohibited Countries, Violations and Penalties, and Political Contributions, Fees and Commissions. Please note that Part 122 also include requirements for notifying this office of changes to your Registration Statement.

ITAR Section 129.9 requires that any person registered as a broker provide annually a report to DDTC (Attn: the Office of Defense Trade Controls Compliance). This report is due with the broker

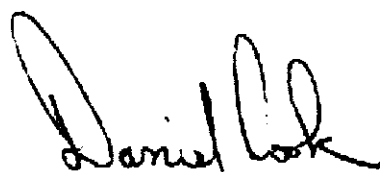
activity not the subject of a prior broker report. Broker reports must cover all brokering activity up to three months prior to the expiration of the broker registration. If not renewing then report is due within 30 days after the expiration of the registration. You must comply with ITAR Section 122.5, which requires you to maintain records concerning your registration and your brokering activities for a minimum period of five years from the expiration of the license or other approval to include the use of exemptions. Records maintained shall be available at all times for inspection and copying by this office or by Customs officials.

Please include your brokering 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 60 days before the expiration date. Your registration must be received at least 30 days before the expiration date. (ITAR Section 122.3(b)). Registration must be current to apply for brokering licenses or other approvals, or to use brokering 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 application (Section ITAR 122.4).

You may refer to the DDTC website for a Compliance Guide at <http://www.pmdtdc.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).

For general registration related questions, please contact the DDTC Response Team at 202-663-1282 or by email at ddtccustomerservice@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