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

HELENA ISTIRANEOPULOS
President
CHARIOT AEROSPACE MATERIALS, INC.
1035 NW 31ST AVE
N/A
POMPANO BEACH, FL 33069

2025-06-04

REGISTRANT CODE: K-6914
EXPIRATION DATE: 2026-06-30

Reference: DDTC US Broker Registration Statement and Fee Submission

Dear HELENA ISTIRANEOPULOS:

The Office of Defense Trade Controls Compliance (DTCC) received your registration statement and fee to register as a broker. Your registration code is K-6914, which expires on 2026-06-30.

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 applying for a brokering license or other approval from the Directorate of Defense Trade Controls (DDTC) but does not confer any additional privileges. Further, if you also plan to engage in the business of manufacturing or exporting defense articles or furnishing defense services, you must register separately as an exporter / manufacturer with DDTC.

As a registered broker, you are required to comply with the ITAR, including, but not limited to, those specific to Part 129 on brokering activities. Please also note that Part 122 includes requirements for notifying this office of changes to your Registration Statement.

ITAR Section 129.10 provides that any person required to register as a broker must provide annually a brokering report to DDTC of that person's brokering activities in the previous year. This report must be submitted with the broker's registration renewal submission. The report must cover all brokering 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 you are not renewing your registration, then you must submit the report within 30 days of the expiration of your registration.

As the senior officer empowered to sign the registration statement, you should ensure that you and your organization maintain records regarding: 1) The 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" for their organization; and 2) The list of qualified, direct employees who will serve as "empowered officials," listed by name, position, business unit, phone and fax numbers and email addresses. Please note that third parties (i.e., individuals who are not direct employees, such as consultants, subcontractors, or outside counsel, for example) cannot serve as "empowered officials."

Also, ITAR Section 122.5, requires you to maintain records concerning your brokering activities for a minimum period of five years from the expiration of the broker license or other approval, to include the use of exemptions, or from the date of the transaction. Records maintained shall be available at all times for inspection and copying by this office or by Customs officials. To ensure such records are maintained in accordance with ITAR Section 122.5, the organization should provide appropriate training on AECA and ITAR requirements to all employees who will be performing recordkeeping functions and ensure they comply with the ITAR. Ramifications for the failure to comply may include shipment delay and/or shipment seizure by Customs and Border Protection, loss of export privileges, and/or criminal or civil penalties.

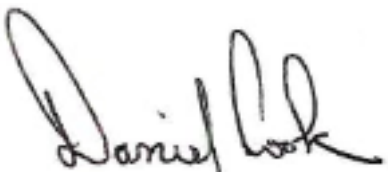
Further, if your organization has foreign-person employees, including officers and senior managers, your organization must first obtain a license or other approval before providing such foreign-person employees with access to any ITAR-controlled technical data. It is also prohibited to provide defense services or export defense articles to subsidiaries/affiliates located in proscribed countries under ITAR Section 126.1 (for example, the People's Republic of China, North Korea, Syria, etc.). You should caution your organization's employees not to discuss the substance of ITAR-controlled information with foreign-person employees without first obtaining a license or other approval from DDTC.

You may refer to the DDTC website for a Compliance Guide at http://www.pmddtc.state.gov/ and then click on 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 doubt as to whether an article, services, or data is covered by the ITAR Part 121 (the U.S. Munitions List).

You may submit your organization's registration renewal up to 60 days before the registration expiration date. At latest, your registration renewal application must be received at least 30 days prior to the expiration date to avoid a lapse in registration. Registration must be current to apply for brokering licenses or other approvals, or to use ITAR exemptions. A registration is current if the registration is unexpired and has accurate and up-to-date information. Also, if appropriate, DTCC requests you to keep your registration information current by submitting amendment requests via DECCS Registration system.

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 Noel Sampson at 202-632-3380.

Sincerely,



Daniel Cook
Chief, Registration, Compliance, & Analysis
Office of Defense Trade Controls Compliance