

**United States Department of State**

*Bureau of Political-Military Affairs  
Directorate of Defense Trade Controls  
Washington, D.C. 20522-0112*

December 7, 2017

LAWRENCE THOMAS KOECHLEY, PRESIDENT/CEO  
KIRKWOOD HOLDING INC.  
1239 ROCKSIDE RD.  
PARMA, OH 44134  
TKOECHLEY@KIRKWOODHOLDING.COM

**REGISTRANT CODE: M28030**  
**EXPIRATION DATE: 12/31/2018**

Reference: Manufacturer and Exporter Registration Statement and Fee Submission

Dear LAWRENCE KOECHLEY:

The Office of Defense Trade Controls Compliance received your registration statement and fee to register as a manufacturer and exporter. We have reviewed your registration statement and your registration code is M28030, which expires on 12/31/2018.

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,

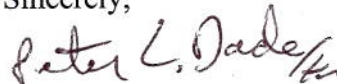
supervisors and employees need appropriate training on AECA and ITAR requirements and must understand the individual and organizational ramifications of failure to comply. Ramifications may include shipment delay and/or shipment seizure by Customs and Border Protection, loss of export privileges, or criminal charges.

You may refer to the DDTC website for a Compliance Guide at <http://www.pmdt.state.gov/> and then click on the Compliance 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 days before registration expiration date. However, your registration must be received at least 30 days prior to this new 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).

If you have any questions regarding registration, please contact us at (202) 663-1282 or [DDTCResponseTeam@state.gov](mailto:DDTCResponseTeam@state.gov).

Sincerely,



Daniel Cook

Chief, Compliance, Registration & Enforcement