

ITAR REGISTRATION MATERIAL CHANGE ACTION CHECKLIST

Following is a checklist that can be used for tracking and logging actions taken related to ITAR Registration Material Changes.

Type of Change	DDTC Notice Requirement	Material Change Effective Date	DDTC Notice Completion date
Change in Registrant Name or Address (including any subsidiary or affiliate entity listed in the Registration)	Change must be submitted via DECCS within 5 days of name/address change effective date		
Change in Executive/Senior Officer or Board Member (including additions or deletions)	Change must be submitted via DECCS within 5 days of change effective date		
Non-U.S. citizen executive/senior officer or board member	Green Card or U.S. visa must be submitted with Change Notice via DECCS		
Change of Eligibility	Change must be submitted via DECCS within 5 days of change effective date		
Criminal charges or conviction of registrant's executive(s)/senior officer(s) (if related to national security or export control statutes)	Submit applicable legal documents (charging instrument, indictment, judgment) with Change Notice		
Ineligible to contract with U.S. Government	Submit applicable legal documents with Change Notice		
Ineligible to receive DDTC licenses for export/temporary import	Submit applicable legal documents (notice of suspension or debarment) with Change Notice		
Merger, Acquisition or Divestiture ("MAD" Material Change)	Change must be submitted via DECCS within 5 days of name/address change effective date		
Five-day MAD Notification Letter	Submit letter to DDTC with details of MAD transaction and resulting entity structure		
List of all corporate entities engaging (currently or in future) in manufacturing, exporting, temporarily importing, or brokering ITAR-controlled items (including parent(s), subsidiaries, and affiliates)	Submit with MAD transaction letter to DDTC		
List of all ownership changes	Submit with MAD transaction letter to DDTC		
Ownership structure chart (before and after MAD)	Submit with MAD transaction letter to DDTC		
List of all executive/senior officer changes	Submit with MAD transaction letter to DDTC		
Spreadsheet/matrix of all approved and pending DDTC authorizations	Must be submitted to DDTC as a General Correspondence requesting amendment(s) with MAD transaction letter		
Statement of Registration Certification form	Submit with MAD transaction letter to DDTC		
MAD Material Change - Foreign Ownership/Control	Change must be submitted via DECCS 60-days prior to sale/transfer to foreign persons		
Same as above MAD Material Change Requirements	Submit with MAD transaction letter to DDTC		
CFIUS filing (if applicable)	Submit CFIUS filing documents with MAD transaction letter to DDTC		
DCSA/NISPOM notification/mitigation requirements (U.S. classified facilities)	Submit applicable documents with MAD transaction letter to DDTC		