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

Danial Billings
Chief Executive Officer
Blue Photon Technology & Workholding SYstems LLC
994 Industrial Park Dr
Shelby, MI 49455

2026-03-06

REGISTRANT CODE: M53278
EXPIRATION DATE: 2027-03-31

Reference: DDTC Manufacturer Registration Statement and Fee Submission

Dear Danial Billings:

The Office of Defense Trade Controls Compliance (DTCC) received your registration statement and fee to register as a manufacturer. Your registration code is M53278, which expires on 2027-03-31.

Any person who engages in the United States in the business of manufacturing or exporting or temporarily importing 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). A registration is current if the registration is unexpired and has accurate and up-to-date information.

Registration is a precondition to submitting an application for an export license or other approval from the Directorate of Defense Trade Controls (DDTC) or to use ITAR exemptions but does not confer any export rights or privileges. In addition, if you also plan to engage in brokering activities pursuant to ITAR Part 129, you must register as a broker with DDTC.

As the senior officer empowered to sign the registration statement, you should ensure that your organization maintains 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 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 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 DTCC or 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,

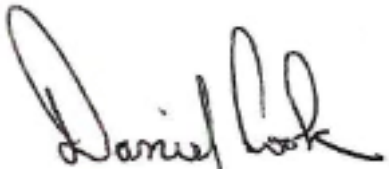
your organization must first obtain a license or other approval before providing such foreign-person employees with access to any ITAR-controlled technical data. It is also prohibited to provide defense services or export defense articles to subsidiaries/affiliates located in proscribed countries under 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 must be received at least 30 days prior to the expiration date to avoid a lapse in registration. You should also ensure your organization's Registration is current before applying for export licenses or other approvals. 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 Travis Bryant at 202-632-2156.

Sincerely,



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