



**United States Department of State**

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

**JAN 24 2018**

Mr. Kevin Ranta, Vice President  
Element Materials Technology Holding USA Inc.  
15062 Bolsa Chica  
Huntington Beach, CA 92649-1023

Reference: ITAR Section 122.4 Material Change (M28262) – Final Notice

Dear Mr. Ranta:

The Office of Defense Trade Controls Compliance (DTCC) has received and reviewed Element Materials Technology Holding USA Inc.'s (Element) January 2, 2018 notification letter advising DTCC of the December 29, 2017 acquisition of Delisle, Inc. (Delisle), and changes in registration information pursuant to International Traffic in Arms Regulations (ITAR) Section 122.4.

Pursuant to this acquisition and in accordance with the information provided in your submission, DTCC: added Delisle to Block 9 of Element's registration (M28262) as a subsidiary; and added Bridgepoint Group Limited, Bridgepoint Advisers Group Limited, Bridgepoint Advisers Holdings, BEV Nominees Limited, Element Materials Technology Group Limited, EMT Holdings Limited, Element Materials Technology Limited, and EMT 2 Holdings Limited to Block 11 of the registration as parents.

No licenses will transfer as a result of this transaction. Generally, firms commonly owned/controlled may not maintain two or more separate registrations. Consequently, Delisle's registration (M18358) will expire as of January 31, 2018.

For your information, guidance regarding, "Notification of Changes in Registration Information," can be found at:  
[www.pmdtdc.state.gov/registration/notification\\_chreg.html](http://www.pmdtdc.state.gov/registration/notification_chreg.html).

DTCC strongly recommends that Element conduct a thorough review of Delisle's ITAR compliance practices and procedures. Such a review will provide a more complete understanding of possible past ITAR violations and determine if there are specific internal controls weaknesses that need to be addressed. Element is reminded of the ITAR Compliance Recommendations DTCC provided in 2016. Additionally, you are reminded and encouraged to make use of the voluntary disclosure provisions found in ITAR Section 127.12.

Foreign person employees who will receive access to any ITAR-controlled articles or technical data must first obtain appropriate licenses/authorizations. Special protocols may be needed to address the day-to-day involvement of foreign person officers and senior managers. Export compliance briefings should be prepared for foreign person officers and managers to ensure they understand ITAR-related restrictions as well as protocols/procedures to request access.

Companies with operations and/or non-ITAR subsidiaries/affiliates in countries subject to provisions of ITAR section 126.1 (for example, China, North Korea, Syria, etc.) are reminded of the prohibition on exports and imports of defense articles and services to such countries. Companies should caution their employees not to discuss the substance of their ITAR-controlled knowledge or activities with individuals lacking appropriate clearances or license authorizations, and should ensure employees are appropriately briefed on their obligations and responsibilities with regard to ITAR compliance.

For general registration-related questions, please contact the DDTC Response Team at (202) 663-1282, or by e-mail at: [DDTCResponseTeam@state.gov](mailto:DDTCResponseTeam@state.gov). For questions related to this matter, please contact Compliance Specialist Matthew Koch at (202) 632-2151.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel L. Cook" with a stylized flourish at the end.

Daniel L. Cook, Chief  
Compliance, Registration & Enforcement