



**United States Department of State**

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

July 18, 2019

Richard Paul Unruh, President/Owner  
Surface Mount Distribution Sales Inc.  
1 Oldfield  
Irvine, CA 92618  
RUNRUH@SMDINC.COM

**REGISTRANT CODE:**

**EXPIRATION DATE: 07/31/2020**

Reference: Broker Registration Statement and Fee Submission

Dear Richard Unruh:

The Office of Defense Trade Controls Compliance received your registration application, and fee to register as a broker. We have reviewed your registration statement and your broker registration code is \_\_\_\_\_, which expires on 07/31/2020.

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 submitting an application for a brokering license or other approval from the Directorate of Defense Trade Controls (DDTC). Further, this registration does not satisfy any independent requirement to register as an exporter / manufacturer pursuant to International Traffic in Arms Regulations (ITAR) Part 122, if so required by the AECA or ITAR.

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.”

As a registered broker you are required to comply with other sections of the ITAR as well as those specific to Part 129 on brokering activities. These include but are not limited to Parts 120, 121, 122, 126, 127 and 130. These Parts cover general authorities and eligibility, the United