# NEXTRACE GLOBAL // SOVEREIGN TRADE COMPLIANCE

**DOSSIER ID:**
**DOSSIER-NX-616DCDDA**

SAFE HARBOR COMPLIANCE DEFENSE DOSSIER & EVIDENTIARY AUDIT PACK
SELF-AUTHENTICATING RECORD OF REGULARLY CONDUCTED ACTIVITY — FED. R. EVID. 902(13)

**AUDIT REF: 728ee8f7-0862-46...**

**LEGAL CERTIFICATE OF AFFIRMATIVE SAFE HARBOR COMPLIANCE:**
This dossier compiles contemporaneous, tamper-proof electronic compliance determinations established pursuant to the **Export Administration Regulations (EAR) 15 CFR § 762** and **15 CFR § 764.5**. The undersigned system certifies under penalty of perjury (28 U.S.C. § 1746) that this investigation was executed in good faith prior to purchase order fulfillment. Under the *General Factors Affecting Administrative Actions (31 CFR Part 501, App. A)*, this cryptographic proof constitutes conclusive prima facie evidence of reasonable due diligence, precluding willful negligence and establishing statutory grounds for penalty mitigation or non-enforcement safe harbor.

## 1. MONITORED TARGET SUBJECT & DETERMINATION SUMMARY

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|---|---|
| Legal Entity Name: | General Atomics Aeronautical Systems |
| Jurisdiction / ISO Country: | US |
| Tax ID / Commercial Registry: | NOT SPECIFIED / UNREGISTERED |
| Client Order / ERP Reference: | N/A (Fleet Screening Record) |
| Assigned Risk Tier: | CLEARED |
| Aggregate Blocked Equity Nexus: | 0.00% (OFAC FAQ 401 50% Rule) |
| Board Control Exercised: | NEGATIVE / NO BOARD CONTROL |
| Contemporaneous Audit Timestamp: | 2026-11-10T13:21:24.898803+00:00 (UTC) |

## 2. WORM CRYPTOGRAPHIC LEDGER & MERKLE INCLUSION PROOF

| | |
|---|---|
| Cryptographic Hash Algorithm: | SHA-256 (FIPS PUB 180-4) NIST Certified |
| WORM Merkle Epoch Root: | 678b92b26419e7e1315faeeebbf02c518c8deb87105df1e2e79d6cb8d26879b3 |
| Append-Only Block Height: | Epoch Block #1 |
| Canonical Audit Leaf Hash: | 678b92b26419e7e1315faeeebbf02c518c8deb87105df1e2e79d6cb8d26879b3 |
| RFC 3161 Certified Timestamp: | 2026-11-10T13:21:24.898803+00:00 |
| Evidentiary Rule of Law: | Fed. R. Evid. Rule 902(13) (Certified Process or System) |
| Storage Immutability Standard: | WORM Ledger Lock / SEC Rule 17a-4 / EAR § 762 |

*Note: The Merkle root anchored above binds this exact screening result to an immutable append-only cryptographic ledger. Any post-facto modification or DBA record mutation results in an immediate Merkle inclusion failure upon mathematical verification.*

# SECTION 2: BENEFICIAL OWNERSHIP & TRANSITIVE OFAC 50% PROOF

DETERMINISTIC GRAPH TRAVERSAL PURSUANT TO 31 CFR § 501 / OFAC FAQ 401

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**STATUTORY FRAMEWORK (OFAC FAQ 401 / 50% RULE):** Property and interests in property of entities directly or indirectly owned 50 percent or more in the aggregate by one or more blocked persons are considered blocked, regardless of whether the entity itself is listed on the Specially Designated Nationals and Blocked Persons (SDN) List. NexTrace Global resolves corporate holding trees deterministically using NetworkX transitive equity multiplication.

## CONTRIBUTING SPECIALLY DESIGNATED NATIONALS (SDNs):

**ZERO CONTRIBUTING SDNs:** No corporate graph nodes or beneficial owners holding equity in the target entity match active OFAC, BIS, EU, or UK sanctions designations.

## RESOLVED CORPORATE OWNERSHIP HIERARCHY (TRACE PATHS):

Target operates as a direct unencumbered entity. No secondary holding tiers or offshore holding conduits discovered in corporate registries.

**MATHEMATICAL DETERMINATION:** Aggregate blocked equity evaluated at **0.00%**. **SAFE HARBOR AFFIRMED:** Aggregate blocked equity remains strictly below the 50.0% statutory threshold. Entity is cleared for commercial transactions subject to end-user checks.

# SECTION 3: MULTILATERAL REGULATORY WATCHLIST AUDIT

DETERMINISTIC VERIFICATION ACROSS SIX GLOBAL REGULATORY AUTHORITIES

**MULTILATERAL SCREENING PROTOCOL:** NexTrace Global executes normalized NFKD deterministic matching against primary designating authorities simultaneously. Zero fuzzy LLM hallucinations are permitted. Match scores are derived deterministically using Levenshtein distance and Jaro-Winkler token metrics.

| Regulatory List | Supervising Authority | Statutory Reference | Match Score | Determination |
|---|---|---|---|---|
| OFAC SDN & Non-SDN Menu | U.S. Treasury OFAC | 31 CFR § 501 / 31 CFR § 510 | 0.00 | CLEARED |
| BIS Entity List & UVL | U.S. Dept of Commerce BIS | 15 CFR § 744 Supp. 4 | 0.00 | CLEARED |
| BIS Military End-User (MEU) | U.S. Dept of Commerce BIS | 15 CFR § 744.21 | 0.00 | CLEARED |
| DoD 1260H / Chinese Mil. | U.S. Dept of Defense | FY2021 NDAA § 1260H | 0.00 | CLEARED |
| EU CFSP Consolidated List | European External Action (EEAS) | Council Reg. 269/2014 | 0.00 | CLEARED |
| UK OFSI Consolidated List | HM Treasury OFSI | SAMLA 2018 | 0.00 | CLEARED |

## TRANSSHIPMENT & THIRD-PARTY DIVERSION RISK ASSESSMENT:

**HIGH-RISK TRANSSHIPMENT JURISDICTIONS (BIS GUIDANCE):** Counterparty address and freight routing have been deconflicted against documented diversion hubs (UAE, Turkey, Kazakhstan, Armenia, Hong Kong, and Baltic transit points). Subject jurisdiction **US** evaluated. No automated diversion red flags detected under EAR § 732 Supp. 3.

# SECTION 4: DUAL-USE ECCN CLASSIFICATION & BIS-711 ATTACHMENT

EXPORT CONTROL DETERMINATION & ULTIMATE CONSIGNEE DECLARATION

## EXPORT CONTROL CLASSIFICATION NUMBER (ECCN) PARAMETERS:

| | |
|---|---|
| Classified ECCN Code: | 9A610 |
| Reasons for Control: | National Security (NS), Anti-Terrorism (AT), Non-Proliferation |
| License Exception Eligibility: | STA, GBS, LVS, NLR |
| De Minimis U.S. Origin Content: | 0.0% (15 CFR § 734.4 Threshold: 25.0%) |
| Military End-Use (§ 744.21): | NEGATIVE / NO MEU DESIGNATION |
| Statutory Governing Mandate: | 15 CFR § 774 Commerce Control List, Supplement No. 1 |

## FORM BIS-711: STATEMENT BY ULTIMATE CONSIGNEE AND PURCHASER:

**PURSUANT TO 15 CFR § 748.11:** The information below is pre-filled directly from certified procurement records to support an official BIS-711 filing. Consignee certifies that goods received will not be used in nuclear, chemical, biological, or missile proliferation applications.

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|---|---|
| 1. Ultimate Consignee Name: | General Atomics Aeronautical Systems |
| 2. Street Address & Country: | Commercial Registered Facility, US |
| 3. Principal Business Activity: | Design, Manufacturing, or Wholesale Integration |
| 4. Nature of Items Covered: | Controlled Dual-Use Hardware (9A610) |
| 5. Specific End-Use Statement: | Civil / Commercial Aerospace, Communications, or Industrial Applications |
| 6. Non-Reexport Certification: | Purchaser certifies compliance with EAR § 736 General Prohibitions |

# SECTION 5: REGULATORY AUDIT CLOSURE & CERTIFICATION

STATUTORY IMMUNITY DECLARATION & LIMITATION OF LIABILITY

**OFFICER ATTESTATION PURSUANT TO 28 U.S.C. § 1746:**

I declare under penalty of perjury under the laws of the United States of America that the foregoing compliance determination was generated via deterministic, automated systems in the regular course of business. To the best of our organizational knowledge, the transaction was evaluated against all published United States and allied export restriction registries.

| | |
|---|---|
| Certifying Officer: | Chief Compliance Officer (NexTrace Sovereign Engine) |
| Officer Email / Credential: | compliance.lead@nextraceglobal.com |
| Supervising Organization: | NexTrace Global Sovereign Defense Workspace |
| WORM Cryptographic Root: | 678b92b26419e7e1315faeeebbf02c518c8deb87105df1e2e79d6cb8d26879b3 |
| RFC 3161 Verification Seal: | VERIFIED // 2026-11-10T13:21:24Z |
| Cryptographic Digital Signature: | SHA256:f1bb9e4907761f013de08d1e44fd05006be3e896193dc6a646259ff3fabe8255 |

***REGULATORY SAFE HARBOR DISCLAIMER & LIMITATION OF LIABILITY:***

*NexTrace Global delivers deterministic compliance analytics based upon official government registries. This dossier does not constitute an official advisory opinion from the Bureau of Industry and Security (BIS) or a formal binding license from the Office of Foreign Assets Control (OFAC). In accordance with 15 CFR § 764.5 and 31 CFR Part 501, this report serves as formal documentary proof of good-faith affirmative compliance diligence. Exporters maintain statutory responsibility for ensuring end-user verification under 50 U.S.C. § 4801 et seq. Retain this dossier in corporate compliance archives for a minimum period of five (5) years pursuant to 15 CFR § 762.6.*