



**ADDITIONAL REMARKS SCHEDULE**

POLICY Marsh Risk & Insurance Services		NAMED INSURED InVeris Training Solutions, Inc. 296 Brogdon Road Suwanee, GA 30024
POLICY NUMBER		
CARRIER	NAIC CODE	EFFECTIVE DATE:



**ADDITIONAL REMARKS**

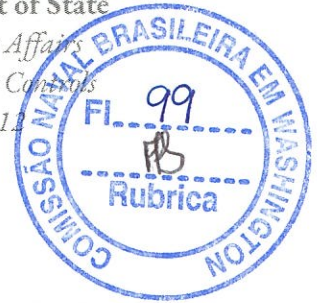
THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,  
 FORM NUMBER: 25 FORM TITLE: Certificate of Liability Insurance

DEFENSE BASE ACT (continued):

- Voluntary Workers Compensation: Statutory
- Employers Liability:
- Bodily Injury by Accident \$1,000,000 each accident
- Bodily Injury by Disease \$1,000,000 each employee
- Bodily Injury by Disease \$1,000,000 policy limit



United States Department of State  
Bureau of Political-Military Affairs  
Directorate of Defense Trade Controls  
Washington, D.C. 20522-0111



2022-07-26

Scott Harris  
Chief Financial Officer  
InVeris Training Solutions, Inc.  
296 Brogdon Road  
Suwanee, GA 30024

**REGISTRANT CODE:** [REDACTED]  
**EXPIRATION DATE: 2023-07-31**

Reference: Manufacturer/Exporter Registration Statement and Fee Submission

Dear Scott Harris:

The Office of Defense Trade Controls Compliance received your registration statement and fee to register as a manufacturer and exporter. We have reviewed your registration statement and your registration code is [REDACTED], which expires on 2023-07-31.

Any person who engages in the United States in the business of either manufacturing or exporting 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 Part 122). Registration serves as a precondition to submitting an application for an export license or other approval from the Directorate of Defense Trade Controls (DDTC), or to use export exemptions. This registration does not satisfy the requirements for registering as a broker pursuant to ITAR Part 129.

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.”

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 this office or by Customs officials. To maintain such records, managers, supervisors and employees need appropriate training on AECA and ITAR requirements and must understand the individual and organizational ramifications of failure to comply. Ramifications may include shipment delay and/or shipment seizure by Customs and Border Protection, loss of export privileges, or criminal charges.

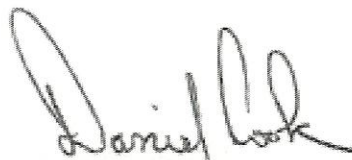
You may refer to the DDTC website for a Compliance Guide at <http://www.pmdtcc.state.gov/> and then click on the ITAR Compliance tab, next click on How to Comply tab. The DDTC website also includes a copy of the ITAR, explanations of export licensing procedures, how to submit a license

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 questions on whether an article, services, or technical data is covered by the ITAR Part 121 (U.S. Munitions List).

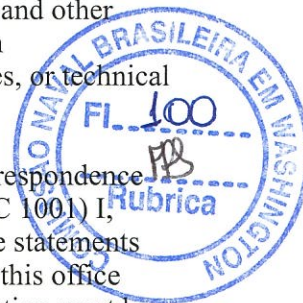
Please include your registration code and the following statement on all registration correspondence to this office: "Under penalty according to federal law (22 CFR 127.2; 22 USC 2778; 18 USC 1001) I, [insert your name], as authorized by [name of company, if applicable] warrant the truth of the statements made herein." We recommend submitting for registration renewal well in advance to ensure this office receives the request up to 60 days before registration expiration date. However, your registration must be received at least 30 days prior to this new expiration date. Registration must be current to apply for export licenses or other approvals, or to use export exemptions. Your registration is not current, for example, if you have not notified this office of any material change in the information contained in your Registration Statement (ITAR Section 122.4).

For general registration related questions, please contact the DDTC Response Team at 202-663-1282 or by email at [ddtccustomerservice@state.gov](mailto:ddtccustomerservice@state.gov). For questions related to this matter, please contact Telethia Thomas at 202-632-2153.

Sincerely,



Daniel Cook  
Chief, Registration, Compliance, & Analysis



# Delaware

The First State



I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF "MEGGITT TRAINING SYSTEMS, INC.", CHANGING ITS NAME FROM "MEGGITT TRAINING SYSTEMS, INC." TO "INVERIS TRAINING SOLUTIONS, INC.", FILED IN THIS OFFICE ON THE FOURTEENTH DAY OF AUGUST, A.D. 2020, AT 10:21 O`CLOCK A.M.



  
Jeffrey W. Bullock, Secretary of State

2658902 8100  
SR# 20206748084

Authentication: 203469502  
Date: 08-14-20

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

**CERTIFICATE OF AMENDMENT  
OF  
CERTIFICATE OF INCORPORATION  
OF  
MEGGITT TRAINING SYSTEMS, INC.**



Meggitt Training Systems, Inc. (the "Corporation"), a corporation organized and existing under the General Corporation Law of the State of Delaware, hereby certifies as follows:

1. This Certificate of Amendment (the "Certificate of Amendment") amends the provisions of the Corporation's Certificate of Incorporation filed with the Secretary of State on September 12, 1996 (the "Certificate of Incorporation").

2. Article First of the Certificate of Incorporation is hereby amended and restated in its entirety to read as follows:

"The name of the Corporation is InVeris Training Solutions, Inc."

3. This Certificate of Amendment was duly adopted in accordance with the provisions of Section 228 and 242 of the General Corporation Law of the State of Delaware.

4. All other provisions of the Certificate of Incorporation shall remain in full force and effect.

IN WITNESS WHEREOF, the Corporation has caused this Certificate of Amendment to be signed by David Horowitz, its President, this 13<sup>th</sup> day of August, 2020.

MEGGITT TRAINING SYSTEMS, INC.

By: David Horowitz  
Name: David Horowitz  
Title: President

**DIRETORIA DE ABASTECIMENTO DA MARINHA**

**DIVISÃO DE APOIO ÀS OBTENÇÕES NO EXTERIOR**



Referência: Documento Circunstanciado nº 7/2022

OMS: Comando do Material de Fuzileiros Navais

Solicitação ao Exterior (SE): PE31000-2022-00040 a 00044 e PE31000-2022-00046 a 00065

Valor total: USD 48.799,61

**ANÁLISE nº 102/2022**

Considerando a legislação e as normas referentes aos processos de obtenção no exterior, em relação ao Documento Circunstanciado em análise, cujo objeto é a aquisição de 25 para a revitalização do Simulador de Armamento Leve MEGGITT, cabe mencionar os seguintes apontamentos:

**1. Planejamento da Contratação:**

Foi informado pela OMS que outras empresas apresentaram cotação dos itens em lide. Sugere-se que seja acostado ao processo as demais cotações com outros fornecedores, com o objetivo de evidenciar a pesquisa de preços realizada pelo Órgão, corroborando com o enquadramento proposto (dispensa de licitação).

**2. Estimativa da Despesa:**

De acordo com o art. 12 da Portaria GM-MD 5.175/2021, a pesquisa de mercado deve evidenciar quais parâmetros foram utilizados, de forma combinada ou não, para fins de determinação do preço da contratação, quais sejam:

I - aquisições e contratações similares de outros entes públicos, firmadas no período de até 1 (um) ano;

II - dados de pesquisa publicada em mídia especializada, de sítios eletrônicos especializados ou de domínio amplo, desde que atualizados no momento da pesquisa e compreendidos no intervalo de até 6 (seis) meses de antecedência da data de divulgação do instrumento convocatório, contendo a data e hora de acesso; ou

III - pesquisa direta com fornecedores, mediante solicitação formal de cotação, desde que os orçamentos considerados estejam compreendidos no intervalo de até 6 (seis) meses de antecedência da data de divulgação do instrumento convocatório.

Assim, sugere-se que seja informado qual dos parâmetros acima foi utilizado para a estimativa da despesa, indicado os documentos anexos que comprovem que o preço estimado para a despesa em lide.

Além disso, a utilização combinada de dispositivos legais da Lei nº 8.666/1993 e da Lei nº 14.133/2021 encontra vedação expressa, nos termos do art. 191, da Lei nº 14.133/2021. Assim sendo, sugere-se revisão do documento, de modo que a OMS opte pelas regras de um dos regimes jurídicos vigentes, escolhendo entre aquele instituído pela Lei nº 8.666/1993 ou pela Lei nº 14.133/2021.

### **3. Prazo para a Entrega ou Conclusão do Objeto:**

Sugere-se indicar o prazo para entrega de acordo com necessidade da Organização.

### **4. Eventual Prestação de Assistência Técnica no Período da Garantia do Objeto:**

Cabe mencionar que as contratações tramitadas por meio de Documento Circunstanciado se caracterizam pela entrega imediata e integral dos bens adquiridos e dos quais não resultem obrigações futuras, inclusive quanto a assistência técnica, sendo assim, formalizados apenas por meio de nota de empenho, ordem de compra ou de execução de serviços.

Excepcionalmente, caso haja a necessidade de formalizar essas relações contratuais por meio de termo de contrato, faz-se necessário anexar ao processo, também, a minuta do contrato negociada entre as partes, nas versões português e inglês.

### **5. Prazo para a liquidação:**

Sugere-se mencionar o prazo para liquidação.

### **6. Conclusão:**

Por se tratar de análise meramente **orientativa**, opino nos limites da verificação documental no que se refere à obtenção, excluídos os aspectos técnicos deste e o poder discricionário do Ordenador de Despesa, sugerindo o **prosseguimento do processo de obtenção no exterior**, desde que sejam observados o atendimento integral às Leis e as normas que regem o assunto.



As orientações realizadas neste documento visam proporcionar o aprimoramento do processo e não afasta a atribuição do agente responsável do Órgão de Obtenção no Exterior de conferir se a contratação direta pretendida atende aos requisitos elencados na Manifestação Jurídica Referencial nº 0003/2022/CJACM/CGU/AGU.



Rio de Janeiro, RJ, 24 de novembro de 2022.

PALOMA BARRETO DOS SANTOS PINTO  
Capitão-Tenente (IM)  
Ajudante da Divisão de Apoio às Obtenções no Exterior  
ASSINADO DIGITALMENTE