



APPROVE WITH PROVISOS

License Number:
BA-L513-23

Date Issued:
12/18/2023

Months Valid:
6

The United States Government position on this case consists of this 1 page decision memo and the attached 5 page application. Both must be present for the USG position to be valid. The POC for this USG action is Thomas Trotto, 202-663-2996, trottot@state.gov.

PROVISOS:

(U) The Department of State approves your request subject to the following provisos and limitations:

(U) 1. This license expires June 14, 2024.

(U) 2. This brokering approval IS NOT AN AUTHORIZATION TO EXPORT, RE-EXPORT, RETRANSFER, OR IMPORT any defense article including technical data, or defense services as designated in 22 CFR Part 121. Such activity requires separate approval.

(U) 3. This determination does not imply that any export, re-export, retransfer, or import license request will be approved. Any future license request will be considered in light of U.S. foreign policy and national security concerns when your request is submitted.

U.S. Department of State

OMB APPROVAL NO 1405 0142
 EXP RAT ON DATE 06/30/2026
 *EST MATED BURDEN 2 HOURS

Application for Brokering License - ITAR Part 129.6

*PAPERWORK REDUCT ON ACT STATEMENT: Public reporting burden for this collection of information is estimated to average 2 hours per response including time required for searching existing data sources gathering the necessary data providing the information required and reviewing the final collection Send comments on the accuracy of this estimate of the burden and recommendations for reducing it to: Department of State (A/G S/D R) Washington D C 20520

1. Date Prepared

11/14/2023

DDTC Registration Code

K-7894

2. Basic Information

Name	RKW STRATEGIC SERVICES, LLC
Attention	Robert Wojciechowski
Street Address	6817 Silver Ln
City	Annandale
State/Province	Virginia
ZIP/Postal Code	22003
Country	United States
Telephone	202-256-0035

3. 129.6(a)(2) Certification Statement

1. Neither the applicant, its chief executive officer, president, vice presidents, secretary, partner, member, other senior officers or officials (e.g. comptroller, treasurer, general counsel) nor any member of its board of directors is:

a. the subject of an indictment has been charged (e.g., by criminal information in lieu of indictment) for, or has been convicted of, violating any of the U.S. criminal statutes enumerated in 22 CFR § 120.6; or

b. ineligible to contract with, or to receive a license or other approval to import defense articles or defense services from, or to receive an export license or other approval from any agency of the U.S. Government;

2. To the best of the applicant's knowledge, no other person involved in the brokering activities enumerated in the request for approval as defined in 22 CFR § 129.2 is the subject of an indictment or has been otherwise charged (e.g., charged by criminal information in lieu of indictment) for or has been convicted of violating any of the U.S. criminal statutes enumerated in 22 CFR § 120.6 or is ineligible to contract with, or to receive a license or other approval to import defense articles or defense services from, or to receive an export license or other approval from, any agency of the U.S. Government.

Select One

- ☒ a. I am authorized by the applicant to certify that the applicant and all the parties to the transaction can meet in full the conditions of 22 CFR § 129.6 as listed above.
- ☐ b. I am authorized by the applicant to certify to 22 CFR § 129.6. The applicant or one of the parties to the transaction cannot meet one or more of the conditions of 22 CFR § 129.6 as listed above. A request for an exception to policy as described in 22 CFR § 127.11 is attached.
- ☐ c. I am authorized by the applicant to certify to 22 CFR § 129.6. The applicant or one of the parties to the transaction cannot meet one or more of the conditions of 22 CFR § 129.6 as listed above. However, that party has met the conditions imposed by the Directorate of Defense Trade Controls in order to resume standard submission of applications, not requiring an exception to policy as described in 22 CFR § 127.11.

- ☐ d. I am not authorized by the applicant to certify the conditions of 22 CFR § 129.6. The applicant and all of the parties to the transaction can meet in full the conditions of 22 CFR § 129.6 as listed above. Please see the attached letter from an official that is authorized by the applicant to certify to the conditions of 22 CFR § 129.6.
- ☐ e. I am not authorized by the applicant to certify the conditions of 22 CFR § 129.6. The applicant or one of the parties to the transaction cannot meet one or more of the conditions of 22 CFR § 129.6 as listed above. A request for an exception to policy, as described in 22 CFR § 127.11, and a letter from an official that is authorized by the applicant to certify to the conditions of 22 CFR § 129.6 are attached.
- ☐ f. I am not authorized by the applicant to certify to 22 CFR § 129.6. The applicant or one of the parties to the transaction cannot meet one or more of the conditions of 22 CFR § 129.6 as listed above. However, that party has met the conditions imposed by the Directorate of Defense Trade Controls in order to resume standard submission of applications, not requiring an exception to policy as described in 22 CFR § 127.11. Please see the attached letter from an official that is authorized by the applicant to certify to the conditions of 22 CFR § 129.6.

4. Describe Brokering Activity

This submission replaces the previously submitted request BA-L433-23 and BA-L457-23 and BA-L475-23. Applicant added one of the missing pieces of information in BA-L433-23 and corrected item 10 from both of the previous submissions. Applicant also corrected commodity information for items 4 and 8 in BA-L475-23. The defense articles are currently under the control of the Ministry of Defense of Sri Lanka. Applicant has been asked by the government of Ukraine to obtain certain defense articles required for the defense of Ukraine from foreign invaders and to deliver such defense articles through 20|20 Supplies B.V. (20|20) on behalf of the government of Ukraine. Applicant has sourced the requested defense articles from EKOCENT. EKOCENT has sourced the requested defense articles from the Ministry of Defense of Sri Lanka. Applicant intends to sign contracts with 20|20 and EKOCENT for the purchase of the defense articles by 20|20 from Applicant and Applicant from EKOCENT, with the defense articles to be delivered directly to the Ukrainian government representatives in Gdansk, Poland. The Ukrainian government representatives will then transfer the defense articles to Ukraine. Applicant will act as an escrow for the funds involved in the transaction, receiving the funds from 20|20 in advance of shipment and disbursing the funds to EKOCENT, 10% prior to shipment and 90% upon delivery and acceptance of defense articles in Gdansk, Poland.

5. Persons who may participate in brokering activity

Brokering Participant # 1

Name Koen Herman
 Address Frankrijkstraat 14
 City Kaatsheuvel
 State/Province
 ZIP/Postal Code
 Country Netherlands
 Nationality Netherlands

Place of Business Information

Name 20|20 Supplies B.V.
 Address Frankrijkstraat 14
 City Kaatsheuvel
 State/Province
 ZIP/Postal Code
 Country Netherlands

Brokering Participant # 2

Name [REDACTED]
 Address [REDACTED]
 City [REDACTED]
 State/Province

ZIP/Postal Code

Country Poland

Nationality Poland

Place of Business Information

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State/Province

ZIP/Postal Code

Country Poland

Brokering Participant # 3

Name Ministry of Defense of Sri Lanka

Address Defence Headquarters Complex

City Jayawardenepura Kotte

State/Province

ZIP/Postal Code

Country Sri Lanka

Nationality Sri Lanka

Place of Business Information

Name Ministry of Defense of Sri Lanka

Address Defence Headquarters Complex

City Jayawardenepura Kotte

State/Province

ZIP/Postal Code

Country Sri Lanka

6 - 7. Commodity Information

Item	Estimated Quantity	Name or Military Nomenclature	USML Category	Classification Level	Value
1	13800	152mm HE D-20 YOM: 2011-2016	III (a(9))	Unclassified	[REDACTED]
2	52000	130mm HE YOM: 2009	III (a(9))	Unclassified	[REDACTED]
3	44000	122mm D-30 YOM: 2011-2016	III (a(9))	Unclassified	[REDACTED]
4	10800	122mm GRAD 20km YOM: 2010+	IV (a(5))	Unclassified	[REDACTED]

Item	Estimated Quantity	Name or Military Nomenclature	USML Category	Classification Level	Value
5	44000	120mm HE Mortar Bomb YOM: 2010+	III (a(9))	Unclassified	████████
6	60000	81mm HE Mortar Bomb YOM: 2009	III (a(9))	Unclassified	████████
7	38000	82mm HE Mortar Bomb YOM: 2009	III (a(9))	Unclassified	████████
8	40000	40mm RPG-7 HE YOM: 2009	IV (a(4))	Unclassified	████████
9	60000	60mm HE Mortar Bombs YOM: 2009	III (a(9))	Unclassified	████████
10	70000	40 x 46mm HE grenade; YOM 2010+	III (a(9))	Unclassified	████████
Total Value					████████

8. End-User Information

Foreign End User # 1

Name Ministry of Defense of Ukraine
 Address 7, Septana Bandery Avenue
 City Kyiv
 State/Province
 ZIP/Postal Code 37040
 Country Ukraine

9. Describe End Use

To be used by Ukraine to defend itself from foreign invaders.

10. Related to Direct Commercial Sale or FMS Program

Direct Commercial Sale in support of stated U.S. Government goals of providing the government of Ukraine with defense articles to defend itself from foreign invasion.

11. Additional Details of Transaction

This application is related to a disclosure filed with Defense Trade Controls Compliance

☐ Yes ☒ No

12. Applicant's Statement

I, Robert Wojciechowski, certify that the request is complete and accurate.