

Instructions for Form DS-7787: Disclosure of Violations of the Arms Export Control Act

Block	Item	Instruction	Required/Not Required
Block 1: Identifying Information	Case Number	Select the relevant case number from the drop-down menu. If this is a new matter, select "New Case."	Required
Block 1: Identifying Information	Registration Code	Enter the code you received upon registering with the Directorate of Defense Trade Controls (DDTC). Select "not registered with PM/DDTC" if you are a U.S. entity not yet registered with DDTC or a foreign entity.	Required
Block 1: Identifying Information	Natural person/Entity	Select "natural person" if an individual is submitting the disclosure or "entity" if the disclosure is submitted by or on behalf of a company or organization.	Required
Block 1: Identifying Information	Doing Business As Name		Not required
Block 1: Identifying Information	Address Line 1, 2, 3, City, State/Province, Country, Zip/Postal Code, and Website	The submitter's address is pre-populated with the information you entered when you registered with DDTC or created a profile to use the online submission system.	Required
Block 2: Submission Information	Type of submission	Select the option that best describes your submission. Select "disclosure" if the submitter is disclosing a	Required

		violation for which it or one of its subsidiaries or affiliates was responsible. Select “notification of a 3 rd -party violation” if the submitter is reporting a violation for which it was not responsible. Select “response to DDTC” for submissions responding to direct requests by DDTC, including directed disclosures.	
Block 2: Submission Information	Type of disclosure	Select the option that best describes your disclosure submission. A full disclosure must include all of the information required by ITAR §127.12(c)(2). If a thorough review of the violation and all related defense trade transactions has not yet been conducted, select “initial notification.” If submitting an “initial notification” the discloser has 60 days to submit a “full disclosure” unless an extension is sought and granted.	Required only if “Disclosure” response under “Type of Submission”
Block 2: Submission Information	Describe supplemental information	If submitting supplemental information, briefly explain how this submission relates to or differs from previous submissions under the same case number. (e.g. supplement to a disclosure that adds the name of an involved party not	Required only if “Supplemental information” response under “Type of Submission”

		previously known.)	
Block 2: Submission Information	Related disclosures	Identify the case numbers, if known, of all prior or ongoing disclosures related to this disclosure. This may include, among others, disclosures with substantially similar circumstances such that prior corrective actions should have prevented the instant violation; disclosures with the same or related fact patterns; disclosures submitted by other parties.	Required for full disclosure
Block 2: Submission Information	Significant Military Equipment	Select if any of the defense articles, including technical data, or defense services involved were considered SME at the time the violation occurred.	Required for complete disclosure
Block 3: Submission Information	Classified	If "Yes" is selected, Do not include classified information anywhere in submission. Contact the Office of Defense Trade Controls Compliance for instructions regarding delivery of classified materials.	Required
Block 3: Violation Information	Number of violations	Provide your assessment of the number of violations of a particular type the submitter is disclosing. To disclose violations of a different type, select "Add" at the end of Block 3.	Not required
Block 3: Violation Information	Date violation(s) occurred	Enter the date on which the violation(s)	Required for full disclosure

		occurred or a date range between which the violation(s) occurred. If selecting a date range, remember to select both beginning and end dates. Select “ongoing” as the end date if the violation is still occurring at the time of disclosure submission.	
Block 3: Violation Information	Discovery date	Enter the date on which the violation was first discovered.	Required for full disclosure
Block 3: Violation Information	Related Department of State licenses or authorizations	Select from the drop-down menu case numbers for any relevant Department of State license or other authorization. If the case number is not listed or no case number exists, such as with exemption citations, describe the authorization.	Required for full disclosure
Block 3: Violation Information	Governmental or non-governmental program or contract	Select “Yes” if the violation involves any government-sponsored or non-governmental programs or contracts, either U.S. or non-U.S. In the resulting fields identify the program and/or contract name and number, if known, and a brief description.	Not required
Block 3: Violation Information	U.S. or foreign subsidiary name and location	If appropriate, select from the drop-down menu the submitter’s U.S. or foreign subsidiaries specifically involved in the violation. If involved subsidiaries are not listed, identify all involved subsidiaries.	Not required

Block 3: Violation Information	Violation type	Provide your assessment of the categories under which the disclosed violation fits best.	Required for full disclosure
Block 3: Violation Information	Violation description	Give a precise description of the nature and extent of the violation (e.g., an unauthorized shipment, doing business with a party denied U.S. export privileges, etc.).	Required for full disclosure
Block 3: Violation Information	ITAR section violated	Select from the drop-down menu all of the relevant ITAR sections directly implicated in violations disclosed.	Required for full disclosure
Block 3: Violation Information	U.S. Munitions List category	Select from the drop-down menus all relevant U.S. Munitions List categories and subcategories for the defense articles, technical data, or defense services (at the time the violation occurred) involved in the disclosed violation.	Required for full disclosure
Block 3: Violation Information	Description	Identify and describe the product, quantity, characteristics, and technological capabilities of the hardware, technical data, or defense service involved in the violation.	Required for full disclosure
Block 3: Violation Information	Persons involved	Provide the complete identities and addresses of all persons known or suspected to be involved in the activities giving rise to the violation. For each, include mailing,	Required for full disclosure

		shipping, and e-mail addresses; telephone and facsimile numbers; and any other identifying information.	
Block 3: Violation Information	Countries involved	Select from the drop-down menu all countries involved in the disclosed violation, including countries of origin for involved foreign persons.	Required for full disclosure
Block 3: Violation Information	Exact circumstances surrounding the violation	Provide a thorough narrative explanation of when, where, how, and why the violation occurred and how it was discovered. Include any factors you believe the Department may view as mitigating.	Required for full disclosure
Block 3: Violation Information	Root cause	Describe the most significant underlying causes of the disclosed violation	Required for full disclosure
Block 4: Point of Contact Information	Point-of-Contact	Identify all points-of-contact authorized to discuss the disclosure by name, title, company or organization of employment, type (e.g. applicant, outside counsel, etc.) and contact information.	Required
Block 5: Certification	Certification statement	This certification statement must be made by an empowered official or senior officer and should accompany all disclosure submissions (including supplemental information and extension requests)	Required for full disclosure
Block 6: Supporting	Technical data	Submissions involving	Not required

Documentation		releases of technical data should include copies of released technical data unless the technical data at issue includes classified material.	
Block 6: Supporting Documentation	Audit report	If relevant to the disclosed violations, corrective actions, or mitigating factors, provide copies of recent audits.	Not required
Block 6: Supporting Documentation	Compliance program manual, policy, or procedure	If relevant to the disclosed violations, corrective actions, or mitigating factors, provide copies of any compliance program manuals, policies, or procedures.	Not required
Block 6: Supporting Documentation	Technology control plan	If relevant to the disclosed violations, corrective actions, or mitigating factors, provide copies of any technology control plans.	Not required
Block 6: Supporting Documentation	Other supporting material	If relevant to the disclosed violations, corrective actions, or mitigating factors, provide copies of other supporting material that may substantiate a claim made in the disclosure (such as a written narrative, timelines, matrices, authorizations, shipping documents, e-mails, written correspondence, training records, contracts, résumés, etc.) and include a description of the document.	Not required

