


620 S Adams Street
Laramie, WY 82070
Phone: 307-223-2785
Fax: 970-416-1208
Email: Info@HIVIZsights.com
www.HIVIZsights.com

Date: April 21, 2026

NRC Required Document for Transfer of Control of Licensed Material - HIVIZ

The Seller agrees to transfer control of the radioactive materials possessed under license #49-35184-01 to the Purchaser. The Purchaser agrees to take control of the same materials.

Seller:




Signature

Joey Turbeville
Printed Name

CEO
Title

Purchaser:




Signature

Christopher Rucinski
Printed Name


CEO
Title

The Purchaser confirms that the Seller has disclosed that there are currently no open inspection items regarding the licenses and registration.

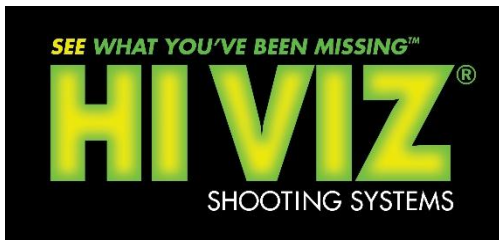


Purchaser

The Purchaser agrees to abide by the conditions of current possession license (#49-35184-01), exempt distribution license (49-3521-01E), and sealed source and device registration (#NR-1382-D-101-E).



Purchaser



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Date: August 13, 2025

U.S. Nuclear Regulatory Commission, Region IV
Materials Licensing Branch
Division Of Radiological Safety and Security
1600 E. Lamar Boulevard
Arlington, TX 76011-4511

RE: Transfer of Ownership and name change

Dear Sir or Miss,

Please be advised that HiViz, LLC, currently owned by PZM, is being purchased by Chris Rucinski and Phil Howe. The information relating to the change of ownership is listed below.

If you have questions regarding this information, please contact me at 307-223-2785 or brad@hivizsights.com.

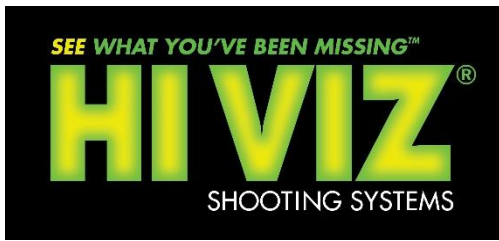
Regards,

A handwritten signature in black ink that reads "Brad Smith". The signature is written in a cursive, flowing style.

Brad Smith

RSO

Cc: US NRC
Washington, DC 20555-0001



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TRANSFER OF OWNERSHIP

Item 1.

Mr. Rucinski and Mr. Howe have agreed to purchase HiViz, LLC through an Asset Purchase Agreement from PZM.

Mr. Rucinski and Mr. Howe will be co-owners. Mr. Rucinski will serve as the CEO of HiViz Group, Inc. Mr. Howe will serve as President.

Board of Directors will remain in place, and the board members will be:

Chris Rucinski

Phil Howe

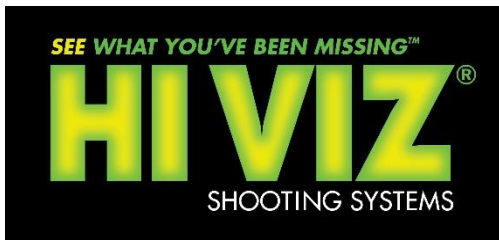
Rene Hernandez

HiViz, LLC, will also be undergoing a name change; it will be incorporated as HiViz Group, Inc. A copy of the new Certificate of Good Standing for HiViz Group, Inc. is included as Attachment A.

Item 2.

There will be no change in personnel related to the Radiation Safety Program.

Item 3.



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There will be no changes in the following:

- Locations
- Facilities
- Equipment
- Radiation safety program
- Use and possession of tritium
- Waste management

Item 4:

HiViz LLC has an excellent program to ensure that removable contamination is kept below regulatory limits. Areas where tritium is used very frequently, are wipe tested and decontaminated on a weekly basis. Areas where tritium is expected less frequently are wiped and decontaminated on a monthly basis. And areas where tritium is used least frequently are wiped on a quarterly basis. Records show that contamination levels are kept below regulatory limits. Wipe tests are analyzed on a Hidex LSC. The calibration and maintenance on this instrument are maintained and current as of this writing.

An example of the wipe tests results is included with this document as Attachment B.

There have been no violations found during recent inspections conducted in 2021; inspection reports are included as Attachment C.

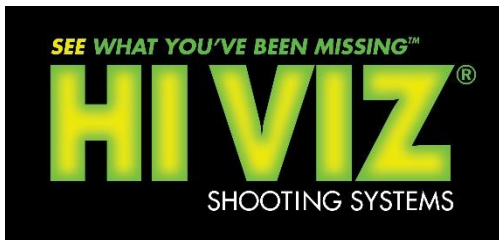
There will be no changes to the facilities, equipment, and radiation safety program. Records related to the radiation safety program will continue to be maintained at the local facilities. These records will be shared with the new ownership.

Item 5.

There is no requirement for decommissioning fund plans.

Item 6.

All records pertaining to the radiation safety program will be maintained at the licensee's site and shared with the new owner (transferee).



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Item 7.

Both parties agree to the transfer of control of licensed material. (Attachment D.)

Item 8.

The Purchaser (transferee) agrees to abide by the constraints of the licenses and tie-down letters.
(Attachment D.)

Item 9.

Not applicable.

Enc.:

- A. Certificate of Good Standing
- B. Wipe Test Results
- C. NRC Inspection Reports from 2021

Agreement to transfer of licensed material and Agreement to abode by licens

STATE OF WYOMING
Office of the Secretary of State

I, CHUCK GRAY, Secretary of State of the State of Wyoming, do hereby certify that according to the records of this office,

HiViz Group, Inc.

is a

Profit Corporation

formed or qualified under the laws of Wyoming did on **June 16, 2025**, comply with all applicable requirements of this office. Its period of duration is Perpetual. This entity has been assigned entity identification number **2025-001700086**.

This entity is in existence and in good standing in this office and has filed all annual reports and paid all annual license taxes to date, or is not yet required to file such annual reports; and has not filed Articles of Dissolution.

I have affixed hereto the Great Seal of the State of Wyoming and duly generated, executed, authenticated, issued, delivered and communicated this official certificate at Cheyenne, Wyoming on this 16th day of July, 2025 at 4:32 AM. This certificate is assigned ID Number 087091934.



A handwritten signature in cursive script that reads "Chuck Gray".

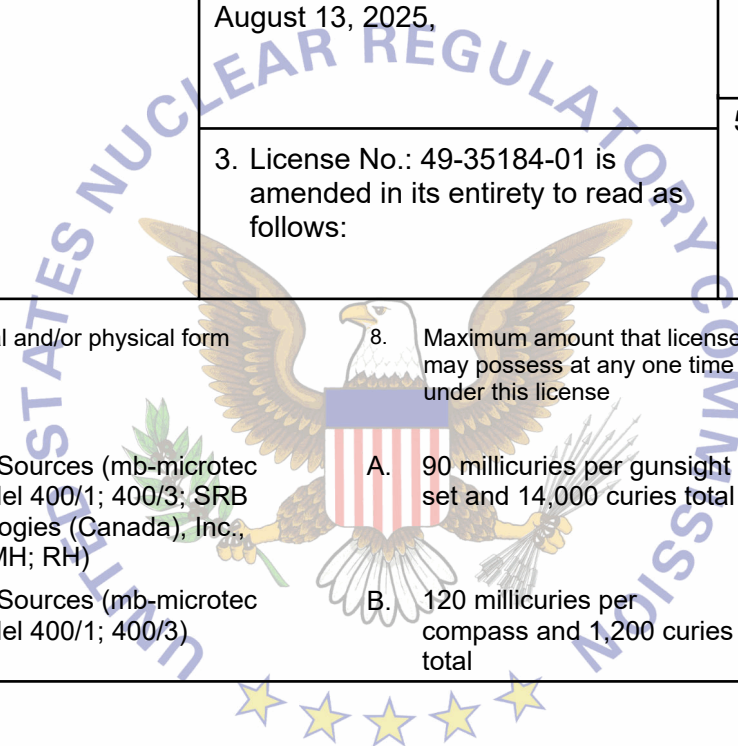
Secretary of State

Notice: A certificate issued electronically from the Wyoming Secretary of State's web site is immediately valid and effective. The validity of a certificate may be established by viewing the Certificate Confirmation screen of the Secretary of State's website <https://wyobiz.wyo.gov> and following the instructions displayed under Validate Certificate.

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, 70 and 71, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee 1. HiViz Group, Inc.		In accordance with letter dated August 13, 2025,	4. Expiration Date: February 29, 2040
2. 620 South Adams Street Laramie, WY 82070		3. License No.: 49-35184-01 is amended in its entirety to read as follows:	5. Docket No.: 030-38781 Reference No.:
6. Byproduct, source, and/or special nuclear material A. Hydrogen-3 B. Hydrogen-3	7. Chemical and/or physical form A. Sealed Sources (mb-microtec ag, Model 400/1; 400/3; SRB Technologies (Canada), Inc., Model MH; RH) B. Sealed Sources (mb-microtec ag, Model 400/1; 400/3)	8. Maximum amount that licensee may possess at any one time under this license A. 90 millicuries per gunsight set and 14,000 curies total B. 120 millicuries per compass and 1,200 curies total	9. Authorized use A. See Condition 10 (gun sights). B. See Condition 11 (compasses).



**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License No.: 49-35184-01

Docket or Reference No.:
030-38781

Amendment No. 13

CONDITIONS

10. A. Research and development as defined in 10 CFR 30.4.
- B. For possession and use incident to installation in gun sights authorized under SSD Model No. NR-1382-D-101-E. (Self-luminous gun sights are not identified by specific manufacturer model numbers because they will be distributed under an exempt distribution license, and will be identified in NRC license number 49-35121-01E issued to HiViz, LLC).
- C. For storage of sealed sources.
- D. For packaging of sealed sources.
- E. For use in calibration of licensee's instruments.
- F. For storage as radioactive wastes.
- G. For return of sealed sources to the licensee's facilities identified in Condition 12, for storage prior to disposal.
11. For possession and use incident to installation in compasses containing gaseous tritium light sources authorized under SSD Model No. NR-1516-D-101-E. For transfer of compasses to NRC license number 49-35735-01 issued to Brunton International, LLC. Exempt distribution of compasses is not authorized by NRC license number 49-35184-01. (Self-luminous compasses are not identified by specific manufacturer model numbers because they will be distributed under an exempt distribution license, and will be identified in NRC license number 22-18199-01E issued to Brunton International, LLC).
12. Licensed material shall be used or stored at the licensee's facilities located at:
- A. 620 South Adams Street, Laramie, Wyoming, 82070
- B. 630 South Adams Street, Laramie, Wyoming, 82070
13. A. Licensed material shall be used by, or under the supervision and in the presence of, individuals who have received training described in application dated September 16, 2024.
- B. The Radiation Safety Officer (RSO) for this license is Bradley Smith.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License No.: 49-35184-01

Docket or Reference No.:
030-38781

Amendment No. 13

14. A. Sealed sources and detector cells shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State. In the absence of a registration certificate, sealed sources shall be tested for leakage and/or contamination at intervals not to exceed 6 months, or at such other intervals as specified.
- B. Notwithstanding Paragraph A of this Condition, sealed sources designed to primarily emit alpha particles shall be tested for leakage and/or contamination at intervals not to exceed 3 months.
- C. In the absence of a certificate from a transferor indicating that a leak test has been made within the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State, prior to the transfer, a sealed source received from another person shall not be put into use until tested and the test results received.
- D. Sealed sources need not be tested if they contain only hydrogen-3; or they contain only a radioactive gas; or the half-life of the isotope is 30 days or less; or they contain not more than 100 microcuries of beta- and/or gamma-emitting material or not more than 10 microcuries of alpha-emitting material.
- E. Sealed sources need not be tested if they are in storage and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.
- F. The leak test shall be capable of detecting the presence of 185 becquerels (0.005 microcuries) of radioactive material on the test sample. If the test reveals the presence of 185 becquerels (0.005 microcuries) or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(c)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations.
- G. Tests for leakage and/or contamination, including leak test sample collection and analysis, shall be performed by the licensee or other persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License No.: 49-35184-01

Docket or Reference No.:
030-38781

Amendment No. 13

H. Records of leak test results shall be kept in units of becquerels (microcuries) and shall be maintained for 3 years.

15. Licensed material shall not be used in or on human beings.
16. The licensee shall not use licensed material in field applications where activity is released to the environment except as provided otherwise by specific condition of this license.
17. Sealed sources containing licensed material shall not be opened or sources removed from source holders by the licensee, except as specifically authorized.
18. Radioactive waste generated shall be stored in accordance with the statements, representations and procedures described in the licensee's application dated September 16, 2024.
19. The licensee shall conduct a physical inventory every 6 months, or at other intervals approved by the U.S. Nuclear Regulatory Commission, to account for all sealed sources and/or devices received and possessed under the license. Records of inventories shall be maintained for 3 years from the date of each inventory, and shall include the radionuclides, quantities, manufacturer's name and model numbers, and the date of the inventory.
20. The licensee shall maintain records of information related to decommissioning as specified in 10 CFR 30.35(g) until this license is terminated by the Commission.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License No.: 49-35184-01

Docket or Reference No.:
030-38781

Amendment No. 13

21. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. This license condition applies only to those statements, representations, and procedures that are required to be submitted in accordance with the regulations. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence impose on the licensee requirements that are more restrictive than or in addition to the regulations.

- A. Application dated September 16, 2024 (ML24267A174)
- B. Letter dated December 20, 2024 with attachments (ML25022A177)
- C. E-mail dated February 3, 2025 (ML25035A107)
- D. Letter dated August 13, 2025 (ML25246A281)



FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date: March 31, 2026By: R/A
Michelle Simmons for Samantha Everett
Region 4

Wipe Test Results

Results in pCi

Weekly

Date	A01	A02	A03	A04	A05	A06
6/20/25	0	8	10	12	35	36
(dpm equivalent)	0	18	22	27	78	80

Monthly

Position

Date	A01	A02	A03	A04	A05	A06
5/30/25	0	2	85	26	19	3
(dpm equivalent)	0	4	189	58	42	7

A07	A08	A09	A10	A11	A12	B01
22	21	6	15	5	12	66
49	47	13	33	11	27	147

				Quarterly	Quarterly
A07	A08	A09	A10	A11	A12
14	179	90	9	2	13
31	397	200	20	4	29

B02	B03	B04	B05	B06
20	8	5	54	63
44	18	11	120	140