

# SIU EXPORT CONTROLS MONTHLY

A RESOURCE FOR CURRENT EXPORT CONTROL ISSUES AND  
EVENTS THAT COULD AFFECT SIU AND ITS FACULTY

## EXPORT CONTROL VIOLATION HOTLINE

If you suspect an export control violation, call:  
618-650-2476



## EXPORT CONTROL ARTICLES



### **TELECOMMUNICATIONS CONSULTANT PLEADS GUILTY TO VIOLATING SANCTIONS ON IRAN**

Farhad Nafeiy, 70, of Alamo, California, was charged with and pleaded guilty to a violation of the International Emergency Economic Powers Act (IEEPA) in the Northern District of California. Under the IEEPA, the President has issued orders prohibiting certain activities and transactions with Iran and the Government of Iran.

### **RUSSIAN-GERMAN NATIONAL ARRESTED FOR ILLEGALLY EXPORTING TO RUSSIA SENSITIVE U.S.-SOURCED MICROELECTRONICS WITH MILITARY APPLICATIONS IN VIOLATION OF U.S. EXPORT CONTROLS**

Arthur Petrov, 33, a dual Russian-German citizen, is charged by criminal complaint, with export control violations, smuggling, wire fraud, and money laundering offenses based on his alleged participation in an ongoing scheme to procure U.S.-sourced microelectronics subject to U.S. export controls on behalf of a Russia-based supplier of critical electronics components for manufacturers supplying weaponry and other equipment to the Russian military.

### **INTERNATIONAL SHIPPING**

SIU's international shipping must comply with export control laws and regulations, which may require SIU to obtain an export license for shipments of tangible items outside of the U.S.

All SIU personnel who engage in international shipping are responsible for ensuring compliance with U.S. export control laws and regulations. Shipping without obtaining the appropriate license or other government approval, or failing to file accurate export or shipping documentation, may result in confiscation of the shipped items, fines and/or other penalties.

The International Shipping guidance can assist you in taking the proper action BEFORE exporting an item. The Export Controls Office can assist you in evaluating if a license is required and if so, in obtaining the license.

## **"TALENT PROGRAM" FAQs**

### **What is a foreign "TALENTS" program?**

Any foreign state sponsored attempt to acquire U.S.-funded scientific research through recruitment programs that target scientists, engineers, academics, researchers, and entrepreneurs of all nationalities working or educated in the United States.

These recruitment programs are often part of broader whole-of-government strategies to reduce costs associated with basic research while focusing investment on military development or dominance in emerging technology sectors. The Department of Energy issued an order on 7 July 2019 with fairly clear explanations of Talents programs [DOE O 486.1](#).

### **How does this affect SIU and me?**

Association with a Talents Program can lead to ineligibility to receive Federal funding for your research. Currently there is no due process to challenge such a determination or limit to the time interval over which it is imposed. Past associations may also be concerning to the US Government.

## **CHINA DEFENSE UNIVERSITIES TRACKER**

The Tracker is a tool created by ASPI's International Cyber Policy Centre to inform universities, governments and scholars as they engage with the entities from the People's Republic of China. It aims to build understanding of the expansion of military-civil fusion—the Chinese government's policy of integrating military and civilian efforts—into the education sector. The Tracker should be used to inform due diligence of Chinese institutions.

## **EQUIPMENT USED IN RESEARCH**

If you use the following equipment/goods in your research or the below is your area of research, please call the Director of Export Controls at 618-650-2476.

- Equipment capable of use in handling biological materials (ECCN 2B352)
- Complete P3 or P4 facilities and components
- Fermenters and components (includes single use and disposable systems)
- Centrifugal separators
- Cross-flow filtration equipment and components
- Freeze-drying equipment
- Spray drying equipment
- Protective suits and Class III safety cabinets
- Aerosol challenge chambers
- Aircraft spraying or fogging systems
- Automated nucleic acid synthesizers (and software)

## **SIU CLEAN LAPTOP PROGRAM**

All SIU travel to the below countries WILL REQUIRE that an Informational Technology Services clean laptop be used during SIU business travel to those countries. Your SIU issued laptop computer SHALL NOT be transported to any of the below countries.

Iran

Russia

Ukraine (Crimea Region)

Sudan

Syria

China

Cuba

North Korea

Venezuela

Cambodia

Belarus

### **U.S. EXPORT CONTROL REGULATIONS**

- EXPORT ADMINISTRATION REGULATIONS (EAR) by the U.S. Department of Commerce Bureau of Industry and Security (BIS)
- INTERNATIONAL TRAFFIC IN ARMS REGULATIONS (ITAR) by the U.S. Department of State Directorate of Defense Trade Controls (DDTC)
- FOREIGN ASSETS CONTROL REGULATIONS (FACR) by the U.S. Department of Treasury Office of Foreign Assets Control (OFAC)

### **SIU EXPORT CONTROLS CONTACT INFORMATION**

#### **Director of Export Controls**

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### **SIU EXPORT CONTROLS WEBSITE**

### **SIU EXPORT CONTROL COMPLIANCE MANUAL**

## **NEWSLETTER CONTENT REQUESTS**

If you find any articles, research, or other information relevant to export controls, or have a specific topic you think would be a great addition to this newsletter, please submit your ideas to [bjmartin@siu.edu](mailto:bjmartin@siu.edu).