

# 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



### **BIS IMPOSES \$300 MILLION PENALTY AGAINST SEAGATE TECHNOLOGY LLC RELATED TO SHIPMENTS TO HUAWEI**

BIS's investigation determined that Seagate engaged in conduct prohibited by the Export Administration Regulations (EAR) by ordering or causing the reexport, export from abroad, or transfer (in-country) of more than 7.4 million hard disk drives subject to the Huawei FDP rule without BIS authorization. This historic foreign direct product enforcement case and settlement represents the largest standalone administrative penalty in BIS history. The resolution also includes a multi-year audit requirement and a five-year suspended Denial Order.

### **U.S. TO PENALIZE COMPANIES FOR STAYING QUIET ABOUT EXPORT-CONTROL ISSUES**

The U.S. Commerce Department is cracking down on companies that discover potential export-control violations but choose not to disclose them to the government.

### **INTERNATIONAL TRAVEL TO HIGH RISK COUNTRIES**

The SIU Export Controls website includes information about [international travel](#). Within the International Travel page, it further includes an [International Travel Tips for High-Risk Countries](#) guidance document. These tips are broken down into tips for what you can do prior to travel, during travel, and upon return to the United States.

The SIU International Travel Tips also includes a link to the [Travel to High-Risk Areas](#) guidance provided by the U.S. Department of State - Bureau of Consular Affairs.

If you plan to travel to a high-risk area, please make sure to utilize these resources to ensure you have a safe trip that adheres to all regulations.

Additionally, always remember to contact the Export Controls office before any international travel.

## **"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.

<b>Signature (electromagnetic) reduction devices</b> .....	1A101
<b>Signature suppression devices, treatments &amp; fittings</b> .....	1A101
<b>Silicon carbide (SiC) substrate blanks</b> .....	6C004.d
<b>Silicon, hetero-epitaxial grown multi-layer substrates</b> .....	3C001.a
<b>Silicon microcircuits</b> .....	3A001.a
<b>Silicone carbide wafers or semiconductor substrates, ingots, boules or preforms</b> .....	3C005.a
<b>Silicon-on-sapphire integrated circuits</b> .....	3A001.a Note 2
<b>Silver gallium selenide (AgGaSe<sub>2</sub>)</b> .....	6C004.b.2
<b>Silylated resists for semiconductor lithography</b> .....	3C002.d
<b>Simulators for nuclear reactors</b> .....	2A291.b
<b>Simultaneous initiation arrangements or systems, single &amp; multipoint</b> .....	3A232.b
<b>Single crystal casting control software</b> .....	9D004.c
<b>Single crystal casting equipment</b> .....	9B001.a, 9B619
<b>Single crystals</b> .....	6C002.b

## **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).