

# 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



### **CHINESE NATIONAL ARRESTED AT JFK INTERNATIONAL AIRPORT ON FEDERAL CHARGES FOR ILLEGALLY PHOTOGRAPHING MILITARY AIRCRAFT AT NEBRASKA AIR FORCE BASE**

Tianrui Liang, 21, of China, has been charged by complaint for conduct related to illegally documenting Air Force planes located at Offutt Air Force Base.

### **ADANI ENTERPRISES LIMITED SETTLES WITH OFAC FOR \$275,000,000 RELATED TO APPARENT VIOLATIONS OF IRAN-RELATED SANCTIONS**

From November 2023 to June 2025, AEL purchased shipments of liquified petroleum gas (LPG) from a Dubai-based trader purporting to supply Omani and Iraqi gas. Red flags should have put AEL on notice that the LPG actually originated from Iran. This conduct resulted in 32 apparent violations (the "Apparent Violations") of § 560.203(a) of the Iranian Transactions and Sanctions Regulations (ITSR), 31 C.F.R. part 560, by causing U.S. financial institutions to facilitate certain trade-related transactions involving goods of Iranian origin, in violation of § 560.206 of the ITSR.

### **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. The shipment of items to a foreign country are considered an export even it's temporary, wasn't sold, or will be used for research.

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.

## FOREIGN TALENT PROGRAM

A foreign talent program is 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. The Department of Energy issued an order on 7 July 2019 with fairly clear explanations of Talents programs [DOE O 486.1](#).

Participation in such a program must be disclosed on the FCOI form, as well as any relevant forms related to any federal funding that you may be receiving, and on future federal funding proposals. Association with a Talents Program could potentially lead to ineligibility to receive Federal funding for your research.

## MALIGN FOREIGN TALENT RECRUITMENT PROGRAM (MFTRP)

The federal government's definition of a MFTRP or "malign" program includes three main elements: (1) Sponsored by a "country of concern" as defined by the Secretary of State, and currently (as of January 1, 2024) includes China, North Korea, the Russian Federation, and Iran; (2) There is some form compensation or benefit (which does not have to be monetary, including the promise of a future benefit including in-kind contributions or honorary titles); and (3) Includes one of more of the problematic indicators in the federal government's definition of a "malign" talent program.

Participation in a MFTRP is prohibited for researchers applying for or receiving federal funding.

## 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>Vacuum pumps</b> .....	2B231
<b>Vacuum pumps</b> .....	2B350.i
<b>Vacuum pumps for UF6 bearing atmospheres</b> .....	0B002.f.2
<b>Vacuum tubes, electronic microwave</b> .....	3A001.b.1
<b>Vacuum sprytron tubes</b> .....	3A228.a
<b>Vacuum valves, piping, flanges, gaskets</b> .....	2B999.k
<b>Valve seats, made from fluoroelastomers</b> .....	1A001.c
<b>Valves, austenitic stainless steel</b> .....	2B999.n
<b>Valves, bellows seal</b> .....	2A226
<b>Valves, bellows</b> .....	2B350.g
<b>Valves, bellows</b> .....	0B001.d.6
<b>Valves, double-seal</b> .....	2B350.g
<b>Valves, of or lined with stainless steel, copper-nickel alloy or other alloy steel</b> .....	2A292
<b>Valves, diaphragm</b> .....	2B350.g
<b>Valves, gaseous diffusion isotope separation</b> .....	0B001.b.1
<b>Valves, monel</b> .....	2B999.f

## 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	Sudan	Belarus
Syria	China	Cuba	North Korea
Cambodia	Venezuela	Ukraine (Crimea Region)	

### 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).