

# 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 RELEASES NEW EDITION OF “DON’T LET THIS HAPPEN TO YOU!”**

The updated version includes new enforcement cases involving: the first Disruptive Technology Strike Force case to result in a stand-alone administrative penalty; a criminal case against an illicit Russian procurement network; a criminal case where export-controlled items were smuggled outside of the United States and used in an assassination plot; an administrative case against a semiconductor wafer manufacturing company for unauthorized shipments to a party on the Entity List; and violations of the antiboycott regulations.

### **BUSINESSMAN PLEADS GUILTY TO EXPORT AND TAX CHARGES IN CONNECTION WITH SHIPMENTS OF SENSITIVE TECHNOLOGY TO RUSSIA**

Defendant Illegally Transferred Hundreds of Thousands of Dual-Use Semiconductors to Sanctioned Russian Entities with Ties to the Military and Intelligence Agencies.

### **CHEMICALS AND BIOLOGICALS**

Some chemicals and biologicals, even those that are commonly used in the laboratory, are highly controlled under U.S. export control regulations. Whether or not these are export-controlled will depend on several factors, including amounts/mixtures used.

The following have been added to the Commerce Control List:

1. Malononitrile (CAS 109–77–3)
2. 2-Chlorobenzaldehyde (CAS 89–98–5)
3. 2-Chlorobenzyl Alcohol (CAS 17849–38–6)
4. 2-Chlorobenzylamine (CAS 89–97–4)
5. Benzene, 1-chloro-2(dimethoxymethyl) (CAS 70380–66–4)
6. Acetophenone (CAS 98–86–2)
7. Chloroacetyl Chloride (CAS 79–04–9)
8. Chloroform (CAS 67–66–3)
9. o-Aminophenol (CAS 95–55–6)

The full listings and additional information can be found [here](#). If you are using any of these agents, contact the Export Controls Office to aid you in determining whether or not your use of these agents is export-controlled.

## **"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.

- Synthetic diamond material** .....6C004.f
- Synthetic aperture radar (SAR)**...6A008.d
- Systolic array computers/assemblies/components** ..... 4A004.a
- T-2 toxin**..... 1C351.d.15
- Tanks, austenitic stainless steel** ..... 2B999.n
- Tanks, chemical storage (capacity greater than 100 L)** ..... 2B350.c
- Tanks, monel** .....2B999.f
- Tanks, stainless steel** ..... 2B999.g
- Tank turret rings and sprockets induction hardening machines** ..... 2B018.m
- Tank turret bearing grinding machines** ..... 2B018.s
- Tantalum crucibles coated with tantalum carbide/nitride/boride**...2A225.c
- Tantalum made or lined crucibles** ..... 2A225.b
- Tape designed for testing recording equipment of entry 3A002a** ..... 3A002.a
- Tape bonders, stored program controlled equipment** ..... 3B991.b.3.b
- Tape recording equipment** ..... 3A002.a

## 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 WEBSITE**

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

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

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## **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).