


*Export Control Compliance
In the University Context*

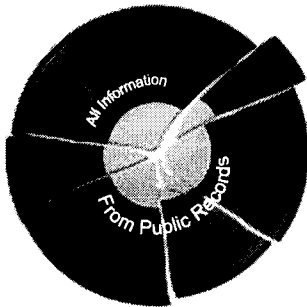
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Austin, Texas
June 5, 2007



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Recent Enforcement Activity



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Recent Enforcement Activity



Department of Justice

FOR IMMEDIATE RELEASE
TUESDAY, MARCH 27, 2007
WWW.USDOJ.GOV

NSD
(202) 514-2007
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**ITT Corporation to Pay \$100 Million Penalty and
Plead Guilty to Illegally Exporting Secret Military Data Overseas**

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Recent Enforcement Activity

☞ March 2007: ITT Corp.

☞ Violations:

- ☞ Export of night vision technical data to UK, Singapore, China.
- ☞ Submitting ITAR reports without notifying U.S. government about ongoing violations.

☞ Penalties:

- \$2 million criminal fine
- \$50 million “deferred prosecution payment”
- \$28 million disgorgement of illegal proceeds
- + \$20 million civil penalty to U.S. State Department
- = Real Money

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Recent Enforcement Activity

December 2006: Lockheed Martin

☞ Violations:

- ☞ exporting controlled technical data to Australian government personnel
- ☞ Exporting data after the expiration of a licensing agreement
- ☞ Disclosing controlled technology during a plant visit without authorization

☞ Penalty: \$3 million civil fine

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Recent Enforcement Activity

October 2006: William Kovacs

☞ President of Elatec Technology Corporation

☞ Violation: exporting of an industrial furnace to a listed proliferation entity in China.

☞ Penalties

- ☞ 366 days in federal prison
- ☞ Three years supervised release
- ☞ 300 hours community service

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Recent Enforcement Activity

April 2006: National Institute for Truth Verification

☞ Florida company

☞ Violations:

- ≈ Releasing controlled technology to Mexican, South African, and South Korean nationals in the United States
- ≈ Shipping computers and software to Mexico, South Africa, and South Korea without an export license
- ≈ Exporting with knowledge a violation was about to occur

☞ Penalties

- ≈ Fined \$77,000
- ≈ Export privileges suspended

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Recent Enforcement Activity

December 2004: Fujitsu Network Communications Inc.

☞ Violations: deemed exports of fiber optic technology

- ≈ Nationals of Ukraine and China
- ≈ All working in the U.S. plant
- ≈ Technology controlled by EAR

☞ Penalty: \$125,000 fine

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Recent Enforcement Activity

December 2004: General Motors

☞ Violations: releasing technical data to foreign nationals in GM facilities in Australia, Canada, and Switzerland

☞ Penalties

- ≈ \$10 million fine
- ≈ \$5 million committed to export control compliance upgrade

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Topics to be Covered

- ☞ Background: Why Trade Controls Matter Now More Than Ever
- ☞ Introduction to U.S. Trade Controls: How Trade Controls Affect Technology Transfer
- ☞ Issues Specific to University Research
 - ↳ "Deemed Export" and Technical Data Export Restrictions
 - ↳ Fundamental Research Exemption
 - ↳ National Security vs. Anti-Discrimination
- ☞ Questions



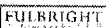
Background: Why It Matters

- ☞ Increased scrutiny on technology transfer, including university research
- ☞ Increased regulation of technology transfer
- ☞ Increased enforcement activity against technology transfers



Background: Increased Scrutiny

- Inspectors General of DOD, State, USDOC 2004:
- ☞ Universities rely on the "fundamental research" exemption
 - ☞ Technology for certain equipment is subject to the "deemed export" provisions
 - ☞ "Laboratories might need to seek deemed export licenses for some foreign nationals working with controlled equipment or otherwise restrict their access to such equipment"
- ↳ 2004 Commerce Inspector General Report (p. iii):



Background: Increased Scrutiny

Major initiative in 2005

- ☞ Universities are receiving visits from BIS, DTC, and FBI
- ☞ Quality of “guidance” from the agencies varies widely
- ☞ Caution is always warranted

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Increased Scrutiny – New Leadership

- ☞ David McCormick, Under Secretary for Industry and Security (BIS Update 2005 Conference, October 24, 2005)
- ☞ “On the top of our list is the effective implementation of a practical deemed export rule, one which gives U.S. business, universities, and research institutions – but not terrorists, proliferators, or other adversaries – access to the world’s best minds.”

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Background: Increased Regulation

- ☞ March 28, 2005: proposed EAR deemed export revision
 - ↳ Based on OIG Report
 - ↳ Would substantially expand deemed export coverage
 - ↳ Final rule delayed; hundreds of formal comments
- ☞ July 12, 2005: proposed defense federal acquisition regulation (DFAR) revision
 - ↳ Based on OIG reports
 - ↳ Would make deemed export compliance part of contract requirements
 - ↳ 149 comments posted
- ☞ Spring 2006: Proposed military “catch-all” provision for EAR
 - ↳ Proposed regulation not yet published
 - ↳ “Know or reason to know” of military end use, prior license required regardless of license exception or exemptions
 - ↳ Driven by China threat

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Background: Increased Regulation

- ☞ May 31, 2006: BIS publishes Withdrawal of Advance Notice of Proposed Rulemaking in the Federal Register on Revisions and Clarification of Deemed Export Related Regulatory Requirements
- ☞ May 31, 2006 Notice also clarifies (some would say radically revises) the definition of "Use" technology under the EAR

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Deemed Export Advisory Committee

- ☞ Announced in Deemed Export Rulemaking context
- ☞ Committee was announced September 12, 2006
- ☞ Charter: address the sensitive technology transfers involving "closely monitored dual-use technology" to foreign nationals in the United States
- ☞ Co-Chairs:
 - ≈ Norman Augustine, Retired Chairman & CEO, Lockheed Martin Corporation and
 - ≈ Robert Gates, PhD, President of Texas A&M
- ☞ Members: Albert Carnesale, PhD, Former Chancellor of the University of California at Los Angeles; Ruth David, PhD, President & CEO, Analytic Services, Inc.; The Honorable John Engler, President, National Association of Manufacturers; Anthony Frank, PhD, Provost and Senior Vice President, Colorado State University; General John A. Gordon, Former Deputy Director, Central Intelligence Agency; Sean O'Keefe, Chancellor, Louisiana State University; Eva Pell, PhD, Senior Vice President and Dean of the Graduate School, Penn State University; Michael Splinter, CEO, Applied Materials; James Siedow, Vice Provost for Research and Professor of Biology, Duke University; William A. Wulf, PhD, President, National Academy of Engineering and Professor of Computer Science and University Professor, University of Virginia.

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Background: Increased Enforcement

- ☞ October 2003: Enforcement budgets increased
- ☞ December 2004: General Motors fined \$10 million for unlicensed exports of ITAR-controlled technical data
 - ≈ Violations: releasing technical data to foreign nationals working in GM's overseas facilities in Australia, Canada, and Switzerland
 - ≈ In addition to fine, GM was required to devote \$5 million to an export control compliance upgrade
- ☞ December 2004: Fujitsu fined \$125,000 for deemed exports to foreign nationals in the United States of EAR-controlled technical data
- ☞ June 2005: FBI announces expanded use of wiretaps for deemed export cases

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Background: Increased Enforcement

- ☞ Timothy Berezney, Asst. Dir. for Counterintelligence, FBI
- ☞ Talk at May Meeting of NAS Committee on a New Government-University Partnership for Science and Security
- ☞ <http://www7.nationalacademies.org/stl/032896.pdf>
- ☞ p. 118 "25 arrests over the last two years of U.S. citizens of Chinese ancestry who are involved in the collection of dual use technology for the benefit of China."
- ☞ Trend identified
- ☞ PhDs at U.S. universities
- ☞ Work in non-classified industrial positions
- ☞ Become U.S. citizens
- ☞ Work in classified industrial positions
- ☞ Collection of dual use technology for benefit of China
- ☞ Agreed that deemed export control at U.S. universities is blunt tool for dealing with such small number of cases that develop years later

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Recent Major Cases Include Universities

- Bubonic Plague to Tanzania –
- ☞ March 10, 2004, a university professor was sentenced to two years imprisonment, three years supervised release and fines and restitution totaling more than \$50,000 for export violations, false statements, theft, embezzlement, fraud, and mail and wire fraud.
 - ☞ The professor had been arrested in January 2003 for falsely reporting to the FBI that 30 vials of bubonic plague bacteria that had been destroyed by the professor were missing and presumed stolen from his university laboratory.
 - ☞ An investigation into the professor's report uncovered that he had earlier exported a related set of bubonic plague bacteria to Tanzania in September 2002 without the required licenses.
 - ☞ OEE jointly conducted the investigation as a member of the Joint Terrorism Task Force.
 - ☞ Source: BIS OEE "Major Cases List" 2006
<http://www.bis.doc.gov/ComplianceAndEnforcement/MajorCases050505.pdf>

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Introduction to Trade Controls


- ☞ Arms Export Controls
- ☞ "Dual Use" Export Controls
- ☞ Sanctions and Embargoes
- ☞ Denied Party Screening
- ☞ Economic Espionage Act
- ☞ Others Not Covered Here:
 - ☞ Customs
 - ☞ Import remedies
 - ☞ Anti-bribery
 - ☞ Anti-boycott
 - ☞ Trade agreements: WTO, NAFTA, etc.

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Arms Export Controls

- ☞ Main regulator: U.S. Department of State Directorate of Defense Trade Controls (DDTC)
- ☞ Regulations: International Traffic in Arms Regulations (ITAR)
- ☞ Controlled items and related technology listed on U.S. Munitions List (USML)
- ☞ Licenses or authorization required for all destinations; very limited exceptions
- ☞ Penalties:
 - Civil fines
 - Loss of export privileges (a.k.a. the "death penalty")
 - Criminal fines and imprisonment



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What is covered by the ITAR?

- ☞ Registration:
 - Manufacturers
 - Exporters
 - Brokers
- ☞ Licensing:
 - Exports
 - Temporary Imports
 - Brokering Activities

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What Exports Are Covered?

- ☞ Defense Article:
 - Items specially designed or modified for military use
- ☞ Defense Service:
 - Furnishing assistance or training to foreign persons regarding defense articles;
 - Furnishing defense tech data to foreign person, wherever located
- ☞ Technical Data:
 - Any information required for design, development, production, manufacture, assembly, operation, repair, testing, maintenance, or modification of defense articles

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Technical Data Exports

☞ Export

- ☞ Physical export
- ☞ Oral, visual, or electronic disclosure, or transfer of technical data, to a foreign person, whether in the U.S. or abroad

☞ U.S. person

- ☞ U.S. citizens (including companies and other organizations incorporated to do business in the U.S.), lawful permanent residents (green card holders), and protected individuals under 8 U.S.C. 1101(A)(20) and 1324B(A)(3) (e.g., asylees)

☞ Foreign Person: Everyone else

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Narrow Exceptions

☞ General scientific, mathematical, or engineering principles commonly taught in schools, colleges, and universities;

☞ Basic marketing information on function or purpose;

☞ General system descriptions of defense articles;

☞ Patents available at any patent office;

☞ Information in the Public Domain, including:

- ☞ Data having unlimited distribution at a U.S. seminar, trade show, exhibition, etc. generally accessible to the public;
- ☞ Data released publicly after approval by U.S. Government;
- ☞ "Fundamental research" in science and engineering at U.S. colleges;
- ☞ Data available to the public through Internet, library, etc.

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Definitions Quiz

Dr. Evil, a former KGB agent and still a Russian citizen, wants to visit the university to take the public tour of the research facilities where work is being performed for the U.S. Army. Is an export license required for Evil to take the tour?



- ☞ Generally, technical data on view in the public tour would be considered "public domain," and thus exempt from ITAR controls

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ITAR Definitions Quiz

Tony Parker, an Airbus engineer (a French national) on a valid student visa in the United States, attends a design meeting where technical data related to military applications are discussed. Is this an export? Is a license required?



- ~ The meeting counts as an export to France by Dr. Longoria
- ~ A license will be required, unless there is an exemption, e.g., the technical data are the result of "fundamental research."

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ITAR Definitions Quiz

Yao Ming, an agent of the PRC Government, views technology for a small military gyro while visiting Big University.



- ~ This is an export of the gyro by Big University, since Yao is a government agent

Any similarity to actual persons, living, dead, or delivering hard fouls in the paint, is purely coincidental

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"Dual Use" Export Controls

- ~ Main Regulator: Department of Commerce, Bureau of Industry and Security (BIS)
- ~ Enforcer: Office of Export Enforcement (OEE)
- ~ Regulations: Export Administration Regulations (EAR)
- ~ Controlled goods, software, and technical data listed on Commerce Control List (CCL)
 - ~ Product / Destination Controls
 - ~ End Use / End User Controls
- ~ Penalties:
 - ~ Civil fines
 - ~ Loss of export privileges (a.k.a. the "death penalty")
 - ~ Criminal fines and imprisonment




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Office of Export Enforcement

Your friends at OEE . . .



. . . Carry a badge.

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What is Covered?

- ☞ "Dual Use" goods, software, and technology covered:
 - Essentially, everything not covered by the ITAR
- ☞ Commerce Control List – items by performance description
- ☞ Catchall category EAR99
 - covers most everyday items;
 - may be exported to most destinations without a license

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EAR or ITAR?

- ☞ *EXAMPLE 1:* Computer monitor designed for commercial use
- ☞ *EXAMPLE 2:* Identical monitor, except that mounting bolt holes are added by the manufacturer at the instruction of the U.S. Marines for mounting to amphibious assault vehicle

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“Deemed Export”

- ☞ “Technology” exports are covered
 - ↳ Plans, formulas, blueprints, know-how
- ☞ “Release” through oral or visual disclosure
 - ↳ To any foreign national
 - ↳ Wherever the release occurs
- ☞ “Deemed” to be an export to the person’s country of nationality or residence

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Dual Use Export Controls Quiz

- ☞ President Bush e-mails French President Nicolas Sarkozy a recipe for Freedom Fries, with an attachment containing EAR-controlled technical data. Is this a controlled export?
 - ↳ W had better have a license or an applicable license exception



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Dual Use Export Controls Quiz

- ☞ M. Sarkozy comes to the United States to visit.
- ☞ Mr. Bush has a license to export EAR-controlled technical data to Mr. Sarkozy during the meeting.
- ☞ After receiving the technical data, Mr. Sarkozy gives it to Gordon Brown in the UK. Is Monsieur Le President going to the Big House?
 - ↳ Sarkozy will do time for unauthorized reexports, unless he has a license or valid exception



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Sanctions and Embargoes

BACKGROUND

- ☞ 26 active sanctions programs; some date from 1950s
- ☞ Post-9/11: a new world of sanctions
- ☞ Main Regulator: U.S. Department of Treasury Office of Foreign Assets Control (OFAC)
- ☞ Penalties:
 - ≈ Civil fines
 - ≈ Criminal fines and imprisonment



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Different Programs, Different Elements

- ☞ Comprehensive embargoes: Cuba, Iran, Sudan
- ☞ Investment prohibitions, e.g., Burma, Iran
- ☞ Export/Import prohibitions, e.g., Syria, North Korea
- ☞ Asset Freeze, e.g., terrorists, narcotics traffickers
- ☞ Tailored programs, e.g., rough diamond imports

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Sanctions and Embargoes

- ☞ Certain persons are subject to separate sanctions ("Specially Designated Nationals")
 - ≈ Includes companies, organizations, individuals, and vessels
 - ≈ Unlawful to conduct any transaction with an SDN
 - ≈ Sanctioned persons based in many countries, including U.S. allies (UK, France, etc.)

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Sanctions and Embargoes

- ☞ Direct export violation: export to a sanctioned party or country
- ☞ Indirect export violation
 - ☞ export to a third party with knowledge or reason to know of export to a sanctioned party
 - ☞ Don't self-blind
- ☞ Export of "services" may be prohibited
- ☞ "Facilitation" of actions of others may be prohibited

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Sanctions and Embargoes

- ☞ Emerging Issue for IP: License versus sale
 - ☞ OFAC assumes licensor maintains control
 - ☞ License provisions required to prevent improper use, retransfer
- ☞ Affects inventory analysis
- ☞ No written guidance
- ☞ OFAC informal guidance suggests that licensor must control final destination through license provisions
- ☞ Note: royalty payments – may need to analyze sanctioned party "interest"

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Restricted Parties Screening

WHO IS RESTRICTED?

Five U.S. Government lists of restricted parties:

- ☞ Specially Designated Nationals List:
ustreas.gov/offices/enforcement/ofac/sdn/index.html
- ☞ Denied Persons List:
www.bis.doc.gov/dpl/Default.shtm
- ☞ Debarred Parties List:
www.pmdtc.org/debar059.htm
- ☞ Unverified List:
www.bis.doc.gov/Enforcement/UnverifiedList/unverified_parties.html
- ☞ Entity List:
www.bis.doc.gov/Entities/Default.htm

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Restricted Parties Screening Quiz

❖ CAN YOU TAKE A GROUP OF GRADUATE STUDENTS TO CUBA TO REHABILITATE A HACIENDA AS A PART OF A COURSE IN THE ENVIRONMENTAL DESIGN PHD PROGRAM?

➤ Sure, if you have a specific license issued by OFAC. Oh, and don't book through the tour director who hangs out in the Miami airport.

❖ CAN YOU SHIP A CALIPER TO JETPOWER INDUSTRIAL LTD. IN HONG KONG?

➤ Probably not – Jetpower is on the Commerce Department Unverified List

❖ CAN YOU SAMBA WITH GEORGE CHARAMBA?

➤ Probably, but don't buy him dinner

➤ Mr. Charamba is an SDN from Zimbabwe

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Economic Espionage Act

❖ Criminalizes economic espionage

❖ Cases Investigated by FBI, often with BIS or DTC

❖ FBI's "outreach" program: Awareness of National Security Issues and Response (ANSIR)

➤ Designed to reduce your vulnerability

➤ Disseminates unclassified threat info

➤ A visit by the ANSIR Agent from Houston, Dallas, San Antonio, or El Paso field office

➤ Sometimes segues into an export investigation



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Issues Specific to University Research

❖ "Deemed Export" and Technical Data Export Restrictions

❖ Fundamental Research Exemption

❖ National Security vs. Nondiscrimination

❖ Open university vs. deemed export controls

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Deemed Exports

- ☞ “Technology” includes data, designs, manuals, know-how, processes
- ☞ Export of technology occurs by:
 - ↳ Visual inspection
 - ↳ Oral disclosure
 - ↳ Application of knowledge abroad
- ☞ Export is “deemed” to take place when technology is provided to a foreign national, wherever located
- ☞ “Foreign national” is anyone who is not
 - A) a citizen of the United States, or
 - B) a lawful permanent resident of the United States
 - C) Protected under asylum or refugee status

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Deemed Exports

- ☞ A foreign national is treated as a foreign country
- ☞ Authorization to work or study in the United States does not authorize disclosure
- ☞ License or valid exception must be in place
- ☞ Examples:
 - ↳ Chinese national employee on a B-1 visa
 - ↳ Meeting in Austin with Indian engineers
 - ↳ Visit to Brazilian research site
 - ↳ What about Chinese graduate students?

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Fundamental Research Exemption

- ☞ Technology is not subject to the Export Administration Regulations if the result of “fundamental research”
- ☞ ITAR has similar rule
- ☞ Defined narrowly, many conditions
 - ↳ Pre-publication review may invalidate
 - ↳ Certain export restrictions may invalidate
- ☞ Pressure to narrow the exemption
 - ↳ Pressure from government agencies
 - ↳ Pressure from research sponsors
 - ↳ “Troublesome Clauses”

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“Troublesome Clauses”

- ☞ Innocuous-seeming clauses in research contracts may destroy protection of fundamental research exemptions
- ☞ Examples upon request
- ☞ Subject of much research, review, and legal work
- ☞ The troublesome clauses can be negotiated, contrary to what some sponsors or contracting officers will tell you

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Fundamental Research Quiz

- ☞ Does Big U. need an export license to have Alexander Ovechkin, a Russian graduate student, work in a university research laboratory?



- ☞ BIS Answer: no license required if the research qualifies as "fundamental research"
- ☞ Under proposed regulation: license may be required if the student needs access to technology to use equipment, if the export of the equipment to Russia would require a license under the EAR

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Fundamental Research Quiz

- ☞ Big Tech U. will host Yao Ming, a PRC scientist who is an expert on research in engineered ceramics. Do the U.S. researchers need an export license before telling Yao about their unpublished research results in ceramics?



- ☞ No license required if they performed the research at the university, and were subject to no contract controls on release of the research
- ☞ BIS warns that the visitor will be debriefed later about anything of potential military value he learns from his visit
- ☞ Caution is warranted; seek expert legal advice

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Employment Discrimination Issues

- ☞ Foreign national employees, vendors, contractors, visitors, etc. must be screened in order to avoid prohibited exports
- ☞ Licenses may be required
- ☞ You may need to gather information about foreign national workers:
 - Country of citizenship
 - Permanent residence
 - Visa status

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Employment Discrimination Issues

- ☞ Under Title VII, certain hiring and other selection decisions are permitted in compliance with national security requirements
- ☞ Conditions:
 - duties are subject to any national security law or Executive Order of the President;
 - individual does not meet the national security requirement
- ☞ Policies must be adopted for nondiscriminatory reasons and applied in a nondiscriminatory manner

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Employment Discrimination Issues

- ☞ State laws may differ from U.S. law, and should always be consulted
- ☞ Careful compliance procedures must be in place
- ☞ Consult labor, immigration, and trade controls counsel

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Open University vs. Export Controls

- ☞ Freedom of inquiry and open exchange of ideas are crucial to security
- ☞ National security is protected by export restrictions
- ☞ National security may be damaged by policies that impair freedom
- ☞ How to tailor national security policies, procedures to minimize loss of freedom of inquiry?
- ☞ How to tailor university compliance systems to balance competing interests?

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Selected Resources

- ☞ NSDD 189
 - <http://www.fas.org/irp/irfiles/nsdd/nsdd-189.htm>
- ☞ 2004 Inspector General Reports
 - DOC: <http://www.oig.doe.gov/ig/reports/2004/BIS-IFE-16176-03-2004.pdf>
 - DOD: <http://www.dodi.g.mil/audit/reports/fy04/04-062.pdf>
 - DOE: <http://www.ig.doe.gov/pdf/ig-0645.pdf>
- ☞ AAUP Report 2003:
 - <http://www.aaup.org/statements/REPORTS/Pow9-11.pdf>
- ☞ COGR Report 2004:
 - <http://www.congr.edu/files/ExportControls.cfm>
- ☞ SRA 2006 International Meeting October 14-18:
 - <http://www.international.org/sra03/templats/mbAM06.cfm?cid=79&id=722>
- ☞ BIS Proposed Rulemaking (70 Fed. Reg. 15607):
 - <http://www.access.gpo.gov/hac/fedreg/epd470f615607.wpd>
- ☞ ABA Export Committee Comments on BIS Regulation:
 - http://www.aba.net.org/intlaw/committees/business_regulation_export_controls/deemedexportcomments.pdf
- ☞ BIS withdrawal of Deemed Export rulemaking 71 Fed. Reg. 30840:
 - <http://a257.g.akamtech.net/7.257.2422/01jan20061800/edocket.access.gpo.gov/2006/E6-8370.htm>

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Thank You

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*Effective Compliance Systems in Higher Education
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