



MEMORANDUM

January 25, 2019

TO: UO Faculty, Staff, and Students

FROM: David Conover, Vice President for Research and Innovation
Jamie Moffitt, Vice President for Finance of Administration

RE: Export Control Regulations

We are writing to announce a new website and training resources to help the campus community better understand and comply with export control regulations. This new webpage can be found at exportcontrols.uoregon.edu.

In the course of conducting research or traveling internationally, our faculty and staff may be subject to U.S. export control regulations, which impose access, dissemination or participation restrictions on the transfer of items and information regulated for reasons of national security, foreign policy, anti-terrorism or non-proliferation.

When export controls apply — for example, when we engage in any activity, including academic conference attendance or participation, involving any of the sanctioned U.S. countries (Iran, North Korea, Syria, Cuba, Sudan and the Crimea Region/Ukraine) or denied entities in other countries — it will likely require an export control license. Following are a few real-world examples that demonstrate what can happen when export control regulations aren't followed and underline the importance of adhering to these regulations:

- At the University of Michigan, a research fellow shipped an MRI coil to Iran without a license. The research fellow was not aware he needed it, but even without demonstrable intent, the research fellow was criminally prosecuted for the shipment and subjected to civil penalties as well.
- At the University of Tennessee, John Reece Roth, a former professor of electrical engineering, served four years in prison for committing conspiracy, wire fraud, and 15 counts of exporting “defense articles and services” without a license. Among other violations, Roth unlawfully traveled to China with a laptop containing sensitive Department of Defense files and employed an Iranian and a Chinese graduate student in his lab without securing the required federal licenses.
- At the University of Massachusetts at Lowell, researchers exported an atmospheric sensing device, antennae and cables valued at slightly more than \$200,000 to Pakistan’s Space and Upper Atmosphere Research Commission. Because the university did not secure a license for the shipment to the Pakistani commission — which is on the bureau’s entity list of individuals, businesses and government and private organizations that are subject to licensing requirements — the university was fined \$100,000.

Fines for export control violations can go as high as \$1.4 million and can result in imprisonment. It is extremely important for members of the university community to familiarize themselves with these regulations. Generally speaking, these regulations impose federal controls over certain services and access to or transfers of physical items, computer software and technical information — whether involved in teaching, research, service or international travel. These include controls over the transfer of technical information to foreign nationals, even when they are in the United States (known as a “deemed export”).

Other activities that may be subject to export control regulations are discussed on the export controls website: exportcontrols.uoregon.edu.

In addition to facing fines and possible imprisonment, individuals and institutions found to be involved in export control regulation violations may be prohibited from engaging in future export activities. Faculty and staff are required to demonstrate their due diligence and to document their adherence to US export controls and trade sanctions laws when such laws apply.

Please familiarize yourself with the material on this website and ask your colleagues to do the same. Visit our website exportcontrols.uoregon.edu or contact exportcontrols@uoregon.edu if you have any questions or concerns.