

## EIB World Trade Headlines

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## U.S. Commerce Department Expands Export Restrictions on Russia

FOR IMMEDIATE RELEASE Tuesday, July 29, 2014

**WASHINGTON** – The U.S. Department of Commerce's Bureau of Industry and Security (BIS) today is further restricting trade with Russia in response to Russia's continued actions supporting separatists in Ukraine.

BIS WIII Institute a policy denying export, reexport or foreign transfer of certain items for use in Russia's energy sector that may be used for exploration or production from deepwater, Arctic offshore, or shale projects that have the potential to produce oil. While these sanctions do not target or interfere with the current supply of energy from Russia or prevent Russian companies from selling oil and gas to any country, they make it difficult for Russia to develop long-term, technically challenging future projects.

In addition to these energy sector restrictions, BIS will add another Russian defense technology company – OJSC United Shipbuilding Corporation – to the Entity List based on a determination it is involved, or poses a significant risk of becoming involved, in activities contrary to the national security and foreign policy interests of the United States. Designation on the Entity List imposes a license requirement for the export, reexport or foreign transfer of items subject to the Export Administration Regulations to the designated entities, with a presumption of denial.

I oday's actions are being taken in conjunction with an announcement by the U.S. Department of the Treasury that it also will impose sanctions on a number of parties.

software to support national security and foreign policy, including nuclear, chemical and biological weapons, and missile non-proliferation, human rights, regional stability, and curbing terrorism. Criminal penalties and

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### Flights Resume to Israel

The Federal Aviation Administration announced late Wednesday night that U.S. carriers were allowed to resume flights to and from Tel Aviv.

This came nearly 36 hours after the agency had first banned U.S. airlines from traveling to and from Ben Gurion International Airport, halting service after a rocket landed about a mile away from Israel's largest airport. The rule change allowing flights to resume went into effect as of 11:45 p.m. on Wednesday.

"Before making this decision, the FAA worked with its U.S. government counterparts to assess the security situation in Israel and carefully reviewed both significant new information and measures the Government of Israel is taking to mitigate potential risks to civil aviation," the agency said in a statement. The FAA said that it "will continue to closely monitor the very fluid situation around Ben Gurion Airport."

American Airlines, which merged with US Airways, had said on Wednesday that it planned to resume US Airways flights between Philadelphia and Tel Aviv once the FAA allowed it.

#### **Earlier**

The Federal Aviation Administration announced Wednesday that U.S. carriers were banned from flying to and from Tel Aviv for at least another day.

Flights to and from Ben Gurion International Airport, the largest airport in Israel, were grounded on Tuesday for at least 24 hours after a rocket landed about a mile from the airport. The new notice from the FAA extended this until potentially Thursday afternoon.

"The agency is working closely with the Government of Israel to review the significant new information they have provided and determine whether potential risks to U.S. civil aviation are mitigated so the agency can resolve concerns as quickly as possible," the FAA said in a statement.

Even before the FAA's notice was sent out on Tuesday, U.S. airlines had begun to cancel flights to and from Israel. A Delta Airlines flight carrying 290 people from New York to Tel Aviv was diverted to Paris after the rocket was reported near Ben Gurion.

After the flight was diverted, Delta announced that it was suspended all service to and from Tel Aviv. United Airlines and US Airways quickly followed suit. United, which operates two flights daily from Newark to Tel Aviv, suspended operations "until further notice."

"We will continue to suspend flying to and from Tel Aviv consistent with the FAA directive and will continue to coordinate with the FAA to ensure the safety of our customers and employees," United said in a statement after the FAA extended the prohibition.

(\*Continued On The Following Column)

US Airways had canceled the daily flight it operates between Tel Aviv and Philadelphia. American Airlines, which merged with US Airways, said Wednesday it would have resumed US Airways service between Philadelphia and Tel Aviv on Thursday if the FAA had allowed it.

"This is a fluid situation and airlines are working closely with the FAA to ensure the safety of our passengers, crews and aircraft," Jean Medina, spokeswoman for the trade group Airlines for America, said in an e-mail.

The FAA's rule does not govern carriers based in other countries, but airlines from Canada to Europe also suspended service to and from Israel. And the European Aviation Safety Agency said in a bulletin Tuesday that it "strongly recommends" that airlines avoid flying to or from Israel for the time being.

Dozens of flights were canceled, a spokeswoman for the Israel Airport Authority said, stranding scores of travelers.

Officials in Israel had called for the FAA to lift the prohibition and allow flights to resume, sentiments that were echoed in the U.S. But the State Department, which had on Monday issued a warning advising U.S. citizens to delay "non-essential travel to Israel and the West Bank," defended the FAA's decision as one meant to protect Americans.

"The only consideration in issuing the notice was the safety and security of our citizens," Jen Psaki, spokeswoman for the State Department, said. "The FAA continues to monitor and evaluate the situation, and will issue updated guidelines no later than 24 hours from the time the [notice] went into force."

The report of a rocket near the airport and the cancellation of passenger flights came at an unusual moment for commercial air travel, occurring just five days after a Malaysian passenger jet with 298 people onboard was shot down over Ukraine. It brought to mind the dangers faced by commercial aircraft flying over or to areas riven by armed conflicts.

After the Malaysian jet was shot down, the FAA faced criticism for allowing commercial airliners to continue flying in that region at all, particularly since a military transport plane was shot down just days before Malaysia Air Flight 17 was downed. After the Malaysian flight was shot down, the FAA announced that expanding an order that had covered other parts of the country.

But the hundreds of rockets that Hamas militants have fired into Israel in recent weeks do not resemble the missile which took down the Malaysian plane. The Hamas weapons are surface to surface rockets that lack sophisticated guidance systems and often fall harmlessly in remote, scarcely populated sections of Israel. By comparison, authorities believe the Malaysian jet was shot down by a Russian-made Buk SA-11 surface to air

missile, one that can hit targets flying as high as 72,000 feet.

#### **Civil Penalties Information Chart**

Detailed Penalties Information	Aggregate Number of Penalties or Settlements	Monthly Penalties/Settlements Total in USD
07/17/2014	1	21,375
06/30/2014	1	963,619,900
06/27/2014	1	89,775
06/25/2014	1	64,758
06/05/2014	1	50,922,208
05/08/2014	1	279,038
05/06/2014	1	2,809,800
05/06/2014	1	29,340
04/18/2014	1	5,990,490
04/02/2014	1	85,113
03/31/2014	1	157,500
03/06/2014	1	504,225
01/27/2014	1	9,492,525
01/23/2014	1	151,902,000
Year to date totals:	14	1,185,968,047

#### **Selected Settlement Agreements: 2014 Information**

Settlement Agreement between the U.S. Department of the Treasury's Office of Foreign Assets Control and BNP Paribas SA

Settlement Agreement between the U.S. Department of the Treasury's Office of Foreign Assets Control and Clearstream Banking, S.A.



#### 07/22/14

Addition of Certain Persons to the Entity List

This rule amends the Export Administration Regulations (EAR) by adding eleven persons under twelve entries to the Entity List. The persons who are added to the Entity List have been determined by the U.S. Government to be acting contrary to the national security or foreign policy interests of the United States. These persons will be listed on the Entity List under the destinations of Crimea (Occupied), Russia, and Ukraine. There are twelve entries for the eleven persons on the Entity List because one person is being listed in multiple locations, resulting in an additional entry. Specifically, the additional entry covers one person that will be listed on the Entity List under the destination of Crimea

## Secretary of Commerce Penny Pritzker Healthcare and Energy Business Development Mission

Japan and South Korea | October 19-23, 2014

Exciting Opportunity to Expand Your Business in Asia

Secretary of Commerce Penny Pritzker will lead a Healthcare and Energy Business Development Mission to Asia with stops in Japan and South Korea from October 19-23, 2014. This business development mission will promote U.S. exports to Asia by helping U.S. companies launch or increase their business in the healthcare and energy sectors. In both countries, the governments and private sector are investing significant money to develop both sectors.

"One of our key functions at the Department of Commerce is to connect U.S. businesses with new opportunities to sell their products and services in markets with significant potential," said Secretary Pritzker. "We see tremendous opportunities for U.S. businesses in Japan and South Korea, which have energy and health care needs that can be addressed by the goods, services, and expertise of our firms. This trade mission will help us continue to strengthen our economic and commercial ties in the Asia-Pacific region, which is a top priority for the Obama Administration."

In both countries, the governments and private sector are investing significant money in developing their healthcare sector. In South Korea, the total market for drugs and medical device products combined is roughly \$21 billion. In Japan, the over \$150 billion market for these products represents the silver lining of the dark cloud of Japan's aging population. Due to the lack of natural resources, both Japan and South Korea have long been dependent on imported energy sources to meet over its energy needs. For U.S. energy firms, Japan has a compelling need to find new energy sources, optimize the mix of energy imports and increase efficiencies in response to the March 2011 natural disasters and nuclear emergency, which led to the shutdown of Japan's 48 nuclear facilities. Additionally, both near and long term opportunities exist in the South Korean energy sector.

If you're interested in participating in the upcoming business development mission, please visit the mission website to apply:

http://www.export.gov/JapanSouthKoreaMission2014

Why participate in the Asia Healthcare and Energy Mission?

Business Development Missions organized by the Department of Commerce provide a unique opportunity for businesses interested in exploring export opportunities overseas.

Participating U.S. companies will meet with prescreened potential partners, agents, distributors, representatives, and licensees. The agenda will also include meetings with high-level national and local government officials, networking opportunities, and country and industry

Below are statements from two past trade mission participants highlighting their mission experience:

"The high calibre of the meetings was incredible, with access to top level government officials and decision makers. One particular high point during the mission in Ghana was meeting John Dramani Mahama, the Ghanaian President, where the group was given the opportunity to ask direct and frank questions - and received clear and fair responses. It was remarkable to have this level of access to the President and a number of the cabinet ministers, and to be able to talk frankly about business opportunities and issues. We left these meetings with confidence in doing business in Ghana."

#### - SolarReserve

"The overview of the economic and political situations was invaluable and reinforced our understanding of doing business in India. The dozens of meetings we had over the course of four days created direct and tangible results- direct project leads and relationships with potential new clients evolved overnight; something that would have taken years for us to establish on our own."

#### - EHDD Architecture

Additional Information?

Please see attached mission flyer or visit the mission's website

http://www.export.gov/JapanSouthKoreaMission2014 or by contacting the Office of Business Liaison at BusinessLiaison@doc.gov or 202-482-1360.

Dates: October 18-23, 2013

Cities/Countries: Tokyo, Japan Seoul Korea

Participants: Secretary of Commerce Penny Pritzer, Selected U.S. Government Officials, 20-25 Senior Executives from U.S. Companies

Industry Focus: Healthcare products and services, Energy products and services

Application Deadline: The application deadline for this mission will be Friday, August 33, 2014. Applications received after the August 22<sup>™</sup> deadline will be considered as time and space permits.

Application Notification: Companies should receive final notification regarding the status of their application no later than Friday, September 5, 2014.

Participation Fee: After a company has been selected to participate on the mission, a payment to the Department of Commerce in the form of a participation fee is required. The fee schedule for the mission is below:

- \$12,000 for large firms
- \$9,500 for a small or medium-sized enterprises (SMEs)
- \$3,500 each additional firm representative (large firm or SME)

Expenses for air travel, lodging, most meals, and incidentals will be the responsibility of each mission participant.



#### Commerce Department Announces Further Expansion of Export Restrictions on Russia

WASHINGTON – As part of a series of sanctions announced today by the United States, the U.S. Department of Commerce's Bureau of Industry and Security (BIS) is adding 11 parties to its Entity List in response to Russia's continued action in Ukraine. Russian support to the separatists has fueled increased fighting and casualties in eastern Ukraine. Russia continues to provide the separatists with heavy weapons, equipment, and other financing, and continues to allow militants to enter Ukraine freely. In addition, Russia has returned many of its troops to border areas, and also has been massing additional equipment near the border for potential transfer into Ukraine.

In response to Russia's continued policy of destabilization in eastern Ukraine and ongoing occupation of Crimea and Sevastopol, the following 11 parties are being added to the Entity List based on a determination they are involved, or pose a significant risk of becoming involved, in activities contrary to the national security and foreign policy interests of the United States. Designation on the Entity List imposes a license requirement for the export, re-export or foreign transfer of items subject to the Export Administration Regulations to the designated Entities, with a presumption of denial.

Today's additions to the Entity List are: 1) Donetsk People's Republic; 2) Feodosia Enterprise; 3) JSC Concern Radio-Electronic Technologies; 4) JSC Concern Sozvezdie; 5) JSCC Almaz-Antey; 6) Kalashnikov Concern; 7) KBP Instrument Design Bureau; 8) Luhansk People's Republic; 9) MIC NOP Mashinostroyenia; 10) Research and Production Corporation "UralVagonZavod"; and 11) State Research and Production Enterprise "Bazalt."

Today's action is being taken in conjunction with an announcement by the Department of the Treasury that it also will impose sanctions on a number of parties.

BIS controls exports and reexports of commodities, technology, and software for reasons of national security, missile technology, nuclear non-proliferation, chemical and biological weapons non-proliferation, crime control, regional stability, foreign policy and anti-terrorism. Criminal penalties and administrative sanctions can be imposed for violations of the Export Administration Regulations. For more information, please visit www.bis.doc.gov.

### Bell Helicopter Completes Huey II and Bell 407GT Demo Tour in the Middle East

Bell Helicopter, a Textron Inc. company (NYSE: TXT), showcased the full capabilities of the Bell Huey II and the Bell 407GT during a series of demo flights in Jordan and Saudi Arabia in May and June 2014. The Bell 407GT light attack helicopter also completed a successful live fire demonstration in Amman to prove its ability to shoot both precision and non-precision weapons systems. This demonstration was completed in conjunction with L3 Wescam with the MX10 EO/IR Sensor; Dillon Aero with the M134D mini-gun; and featured BAE Systems' Advanced Precision Kill Weapons System (APKWS.)

"Customers throughout the Middle East and Africa have shown significant interest in the unique capabilities of both the Bell Huey II and the Bell 407GT, and have been eager for a chance to see the aircraft in action," said Steve Suttles, Bell Helicopter's managing director of commercial business in the Middle East and Africa. "We were very excited to bring both helicopters to the region to showcase exactly what they can do while operating in their own backyards."

During the two month tour, Bell Helicopter pilots flew more than 15 total demonstration flights for more than 20 passengers in the Bell 407GT, including the Royal Jordanian Air Force, Royal Jordanian Special Operations Brigade and the Royal Saudi Land Forces Aviation Command. The live fire demonstration was conducted on June 4 in Amman, Jordan in conjunction with BAE Systems and included both the BAE APKWS seeker used on conventional 2.75 inch Hydra 70 rockets and the Dillon M134D mini gun. Highlights of the demonstration included:

- Firing two successful APKWS shots on target, one from 3000 meters while flying at 60 knots and a second at 3300 meters while the aircraft was in a hover; more than 6,000 rounds were also fired from the Dillon mini-gun.
- Completing a successful flight in high temperature conditions (116 degrees Fahrenheit/47 degrees Celsius) with a normal load of passengers, fuel and weapons to simulate typical mission weights and demonstrate the Bell 407GT's capabilities even at high temperatures.
- Showcasing the aircraft's ability to fly sniper teams and special operators inside the aircraft while flying at 135 knots, eliminating the need for special teams to be located on the outside of the aircraft, which can reduce airspeed.

"We were very impressed by the Bell 407GT live fire demonstration," said BG Khaled Hakooz, Flying Wing Commander for the Royal Jordanian Air Force. "My pilots who participated were very impressed with the aircraft and we were also happy to see the proof of final success left behind on our targets despite putting the aircraft in some challenging situations."

The Bell Huey II was displayed at SOFEX along with the Dillon Aero MFAS (Mission Flexible Armament System.) Its cross-cabin floor plate system provides a strong foundation for mounting both internal and external weapons stations and swings out of the way when not needed. This ensures that no physical modifications to the airframe are required for different mission requirements. The Dillon MFAS allows for numerous configurations utilizing any combination of both fixed-forward and outboard weapons/storage locations along with internally mounted crew-served weapons.

The Bell Huey II also flew additional customers during it's time in Amman, Jordan and offered aerial support during the Bell 407GT live fire demonstration.

"The Bell Huey II has proven itself both in combat and combat support in the region," said David Sale, regional sales manager at Bell Helicopter. "The Bell Huey II is more than just new paint and refurbished UH-1H parts; it's the only original equipment manufacturer upgrade to the airframe. This includes an air worthiness release, new Bell Helicopter qualifications, new technical publications, and Bell Helicopters award-winning, global 24/7 Engineering Support."





Source: Textron

# Vietnam Still on ITAR Part 126.1 Prohibited List, but Some Licenses Entertained

- The Vietnamese defense expenditure recorded a CAGR of 14.36% between 2010 and 2014, and valued US\$4.3 billion in 2014.
- The country's total defense expenditure during the forecast period is expected to be US\$28.0billion.
- The average share of capital expenditure is expected to be 32.8% over the forecast period against an average share of 32.2% during 2010-2014.
- Over the forecast period, the country's budget for homeland security is expected to be US\$9.7 billion cumulatively.
- The key areas of investment are expected to be fighter and multi-role aircraft, submarines, helicopter, naval vessels, and surveillance systems

Extension of the Implementation of the Joint Plan of Action Reached On November 24, 2013 Between The P5+1 and The Islamic Republic of Iran

#### LICENSES WOULD BE REQUIRED FROM OFAC

On July 19, 2014, the P5+1 (the United States, United Kingdom, Germany, France, Russia, and China, coordinated by EU High Representative Catherine Ashton) and Iran affirmed that they will continue to implement the commitments described in the Joint Plan of Action (JPOA) and the U.S. government has extended through November 24, 2014, the sanctions relief provided for in the JPOA. This extended relief comes into effect on July 21, 2014.

Accordingly, the Department of the Treasury's Office of Foreign Assets Control (OFAC) today is publishing on its Web site the following key documents to continue implementation of the United States' commitments under JPOA: Guidance Relating to the Provision of Certain Temporary Sanctions Relief in Order to Implement the Joint Plan of Action Reached on November 24, 2013, between the P5+1 and the Islamic Republic of Iran, as Extended Through November 24, 2014; an Amended Statement of Licensing Policy on Activities Related to the Safety of Iran's Civil Aviation Industry; and Frequently Asked Questions Relating to the Extension of Temporary Sanctions Relief Provided for in the Joint Plan of Action

## US Government Agencies Expand Ukraine-Related Sanctions

Hinckley Allen - International Update 07.21.14 Suzan M. Lehmann

On Wednesday, July 16, 2014, President Obama announced new economic sanctions that restrict access by targeted companies in Russia's financial and energy sectors to US capital markets. These sanctions are being implemented by the U.S. Department of the Treasury's Office of Foreign Asset Control ("OFAC"), which issued a "Sectorial Sanctions Identification List" ("SSI List") that identifies the targeted Russian companies. Prohibited transactions with the targeted companies are described in two directives issued by OFAC. Directive 1 prohibits US persons from transacting in, providing financing for, or otherwise dealing in debt issued on or after July 16, 2014 ("New Debt") with a maturity of longer than 90 days or new equity issued on or after July 16, 2014 ("New Equity") of targeted companies in Russia's financial sector, their property, or their interests in property. Directive 2 prohibits US persons from transacting in. providing financing for, or otherwise dealing in New Debt of longer than 90 days' maturity of targeted companies in Russia's energy sector, their property, or their interests in property. New Equity is not included in Directive 2.

OFAC also issued General License 1 on July 16, 2014, authorizing certain transactions involving derivative products whose value is linked to an underlying asset that constitutes New Debt or New Equity. The general license, however, does not authorize the holding, purchasing, or selling of the underlying assets prohibited under Directive 1 and Directive 2.

In addition to issuance of the SSI List, OFAC announced on July 16, 2014 the addition of new individuals and entities to the List of Specially Designated Nationals and Blocked Persons List (SDN List). These entities and individuals include Russian weapon manufacturers and officials.

We will continue to monitor the situation. For additional information, please contact Suzan M. Lehmann at slehmann@hinckleyallen.com or (603) 545-6144.



## Press Release - FAA Statement-Notice to Airmen Issued for Ben Gurion International Airport

At 12:15 EDT on July 22, 2014, the FAA issued a Notice to Airmen (NOTAM) informing U.S. airlines that they are prohibited from flying to or from Israel's Ben Gurion International Airport for a period of up to 24 hours. The notice was issued in response to a rocket strike which landed approximately one mile from Ben Gurion International Airport on the morning of July 22, 2014. The NOTAM applies only to U.S. operators, and has no authority over foreign airlines operating to or from the airport.

The FAA immediately notified U.S. carriers when the agency learned of the rocket strike and informed them that the agency was finalizing a NOTAM.

The FAA will continue to monitor and evaluate the situation. Updated instructions will be provided to U.S. airlines as soon as conditions permit, but no later than 24 hours from the time the NOTAM went into force.

The text of the NOTAM reads:

!FDC 4/3630 ZZZ PART 1 OF 2 SECURITY ISRAEL POTENTIALLY HAZARDOUS SITUATION—ISRAEL AIRSPACE DUE TO THE POTENTIALLY HAZARDOUS SITUATION CREATED BY THE ARMED CONFLICT IN ISRAEL AND GAZA, ALL FLIGHT OPERATIONS TO/FROM BEN GURION INTERNATIONAL AIRPORT (LLBG) BY U.S. OPERATORS ARE PROHIBITED UNTIL FURTHER ADVISED. A. APPLICABILITY. THIS NOTAM APPLIES TO ALL U.S. AIR CARRIERS OR COMMERCIAL OPERATORS, ALL PERSONS EXERCISING THE PRIVILEGES OF AN AIRMAN CERTIFICATE ISSUED BY THE FAA EXCEPT SUCH PERSONS OPERATING U.S.-REGISTERED AIRCRAFT FOR A FOREIGN AIR CARRIER. AND ALL OPERATORS OF AIRCRAFT REGISTERED IN THE UNITED STATES EXCEPT WHERE THE OPERATOR OF SUCH AIRCRAFT IS A FOREIGN AIR CARRIER. B. PERMITTED OPERATIONS. THIS NOTAM DOES NOT PROHIBIT PERSONS DESCRIBED IN PARAGRAPH A FROM CONDUCTING FLIGHT OPERATIONS WITHIN THE TERRITORY AND AIRSPACE OF ISRAEL WHEN SUCH OPERATIONS ARE AUTHORIZED EITHER BY ANOTHER AGENCY OF THE UNITED STATES GOVERNMENT WITH THE APPROVAL OF THE FAA OR BY AN EXEMPTION ISSUED BY THE ADMINISTRATOR, 1407221615-1407231615EST END PART 1 OF 2

FDC 4/3630 ZZZ PART 2 OF 2 SECURITY OPERATORS SHOULD CALL THE DOMESTIC EVENTS NETWORK (DEN) AT 202-493-5107 FOR AUTHORIZATION. C. EMERGENCY SITUATIONS. IN AN EMERGENCY THAT REQUIRES IMMEDIATE DECISION AND ACTION FOR THE SAFETY OF THE FLIGHT, THE PILOT IN COMMAND OF AN AIRCRAFT

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## Data Cockpit Voice Recorder MH17 Downloaded

On Tuesday 22 July 2014 at 22:00 in Kiev, Ukraine, the flight data and cockpit voice recorders (the 'black boxes') from the Malaysian Airlines flight 17 were taken into custody by the Dutch ambassador and a team of investigators led by the Dutch Safety Board. The Dutch Safety Board requested that the Air Accident Investigation Branch of the United Kingdom (AAIB) perform the data download from both the recorders. The recorders were transported to the AAIB's laboratory at Farnborough, arriving 23rd July in the early morning.

An international team of investigators has conducted a thorough examination of the Cockpit Voice Recorder. The Cockpit Voice Recorder was damaged but the memory module was intact. Furthermore no evidence or indications of manipulation of the Cockpit Voice Recorder was found. Following the examination, the Cockpit Voice Recorder data was successfully downloaded and contained valid data from the flight. The downloaded data has to be further analysed and investigated.

A thorough analysis of the information obtained will take time, the results of this will be included in the investigation. Tomorrow the team will start the examination of the Flight Data Recorder. This will show whether this recorder also contains relevant information, in which case the data from both recorders will be combined.

Source : Dutch Safety Board

Read more: http://www.asdnews.com/news-56187/Data\_Cockpit\_Voice\_Recorder\_MH17\_Download ed.htm?utm\_source=ASDNews&utm\_medium=email&ut m campaign=Channel 12 28 07#ixzz38mjEkJUf



It's fine to celebrate success but it is more important to heed the lessons of failure.



### Addition of Certain Persons to the Entity List

This rule amends the Export Administration Regulations (EAR) by adding eleven persons under twelve entries to the Entity List. The persons who are added to the Entity List have been determined by the U.S. Government to be acting contrary to the national security or foreign policy interests of the United States. These persons will be listed on the Entity List under the destinations of Crimea (Occupied), Russia, and Ukraine. There are twelve entries for the eleven persons on the Entity List because one person is being listed in multiple locations, resulting in an additional entry. Specifically, the additional entry covers one person that will be listed on the Entity List under the destination of Crimea (Occupied) and Ukraine.

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