



# EIB World Trade Headlines

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## CLARIFICATION OF FEDERAL REGISTER JAN 23 U.S. INDIA Licenses

### *Favorable License approval for "600" Licenses if destined for India, United States or a country in A-5.*

There are two important pieces of the new regulation focusing on the bilateral relationship with India; first it establishes licensing policies of general approval for exports or re-exports to or transfers within India of items subject to the EAR, including "600 series" military items, for civil or military end uses in India or for the ultimate end use by the Government of India, for re-export to a Country Group A:5 country, or for return to the United States. This would include 9A610 or 9A619 if going to India, noting items are not for use in nuclear, "missile," or chemical or biological weapons activities.

Second, the new regulation amends the end user and end use provisions of the Validated End User (VEU) authorization in §748.15 (Authorization Validated End-User (VEU)), paragraphs (a) (eligible end user provision) and (d) (end-use restrictions), to allow that items obtained under authorization VEU in India may be used for civil or military end uses. Again, there are carve outs for MT and WMD related items and activities.

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## Secretary of Commerce Wilbur L. Ross, Jr. Announces \$1.19 Billion Penalty for Chinese Company's Export Violations to Iran and North Korea

Secretary of Commerce Wilbur L. Ross, Jr. today announced that China's Zhongxing Telecommunications Equipment Corporation and ZTE Kangxun Telecommunications Ltd., known collectively as ZTE, has agreed to a record-high combined civil and criminal penalty of \$1.19 billion, pending approval from the courts, after illegally shipping telecommunications equipment to Iran and North Korea in violation of the Export Administration Regulations (EAR) and the Iranian Transactions and Sanctions Regulations (ITSR).

As part of the settlement, ZTE has agreed to pay a penalty of \$661 million to Commerce's Bureau of Industry Security (BIS), with \$300 million suspended during a seven-year probationary period to deter future violations. This civil penalty is the largest ever imposed by the BIS and, if the criminal plea is approved by a federal judge, the combined \$1.19 billion in penalties from Commerce, the Department of Justice, and the Department of Treasury, would be the largest fine and forfeiture ever levied by the U.S. government in an export control case.

"We are putting the world on notice: the games are over," said Secretary Ross. "Those who flout our economic sanctions and export control laws will not go unpunished – they will suffer the harshest of consequences. Under President Trump's leadership, we will be aggressively enforcing strong trade policies with the dual purpose of protecting American national security and protecting American workers."

In addition to these monetary penalties, ZTE also agreed to active audit and compliance requirements designed to prevent and detect future violations and a seven-year suspended denial of export privileges, which could be quickly activated if any aspect of this deal is not met.

"The results of this investigation and the unprecedented penalty reflects ZTE's egregious scheme to evade U.S. law and systematically mislead investigators," Secretary Ross said. "This penalty is an example of the extraordinary powers the Department of Commerce will use to vigorously protect the interests of the United States. I am very proud of the outstanding work of the Department's Bureau of Industry and Security, Office of Export Enforcement and its Office of Chief Counsel."

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As part of the \$1.19 billion plea deal, the U.S. District Court for the Northern District of Texas will consider imposing \$430,488,798 in combined criminal fines and forfeiture on ZTE as part of a plea agreement with the Department of Justice. ZTE has also agreed to pay the Department of the Treasury's Office of Foreign Assets Control (OFAC) \$100,871,266 pursuant to a settlement agreement.

### ZTE's Scheme

Starting no later than January 2010 and continuing through April 2016, ZTE conspired to evade the long-standing and widely known U.S. embargo against Iran in order to obtain contracts with and related sales from Iranian entities, including entities affiliated with the Iranian Government, to supply, build, operate, and/or service large-scale telecommunications networks in Iran, the backbone of which would be U.S.-origin equipment and software.

As a result of the conspiracy, ZTE was able to obtain hundreds of millions of dollars in contracts with and sales from such Iranian entities. Additionally, ZTE undertook other actions involving 283 shipments of controlled items to North Korea with knowledge that such shipments violated the EAR.

Shipped items included routers, microprocessors, and servers controlled under the EAR for national security, encryption, regional security, and/or anti-terrorism reasons. In addition, ZTE engaged in evasive conduct designed to prevent the U.S. government from detecting its violations.

### The Investigation, Sanction, and Subsequent Charges

The BIS Office of Export Enforcement Dallas Field Office, in partnership with the U.S. Attorney's Office for the Northern District of Texas, The Department of Justice Counterintelligence and Export Control Section, FBI and the Department of Homeland Security's Homeland Security Investigations, investigated ZTE for five years, beginning in 2012 when allegations of illegal conduct first surfaced in media reports. BIS's subsequent service of an administrative subpoena on ZTE's U.S. affiliate, ZTE USA, Inc., led ZTE to slow its unlawful shipments to Iran. BIS later learned that in November 2013, following a meeting of senior managers chaired by its then-CEO, ZTE made plans to resume transshipments to Iran that would continue during the course of the investigation.

On March 7, 2016, the Department of Commerce sanctioned ZTE by adding it to the Entity List, which created a license requirement to export, reexport, or transfer (in-country) to ZTE any items subject to the EAR.

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The principal basis for the addition were two ZTE corporate documents titled “Report Regarding Comprehensive Reorganization and Standardization of the Company Export Control Matters,” which indicated that ZTE reexported controlled items to sanctioned countries contrary to U.S. law and “Proposal for Import and Export Control Risk Avoidance,” which described how ZTE planned and organized a scheme to establish, control and use a series of “detached” (i.e., shell) companies to illicitly reexport controlled items to Iran in violation of U.S. export control laws.

During the course of the investigation, ZTE made knowingly false and misleading representations and statements to BIS or other U.S. law enforcement agencies, including that the company had previously stopped shipments to Iran as of March 2012, and was no longer violating U.S. export control laws. ZTE also engaged in an elaborate scheme to prevent disclosure to and affirmatively mislead the U.S. Government, by deleting and concealing documents and information from the outside counsel and forensic accounting firm that ZTE had retained with regard to the investigation.

This scheme included forming and operating a 13-member “Contract Data Induction Team” within ZTE between January and March 2016, that destroyed, removed, or sanitized all materials concerning transactions or other activities relating to ZTE’s Iran business that post-dated March 2012; deleted on a nightly basis all of the team’s emails to conceal the team’s activities; and required each of the team members to sign a non-disclosure agreement covering the ZTE transactions and activities the team was tasked with hiding. Under the non-disclosure agreement, team members would be subject to a penalty of 1 million Renminbi (or approximately \$150,000) payable to ZTE if it determined a disclosure occurred.

“Despite ZTE’s repeated attempts to thwart the investigation, the dogged determination of investigators uncovered damning evidence of an orchestrated, systematic scheme to violate U.S. export controls by supplying equipment to sanctioned destinations,” said Douglas Hassebrock, Director of the Bureau of Industry and Security’s Office of Export Enforcement which spearheaded the investigation.

## **U.S. Department of Justice PRESS RELEASE UKRAINIAN NATIONAL ARRESTED IN CONNECTION WITH SCHEME TO ILLEGALLY EXPORT RIFLE SCOPES AND THERMAL IMAGING EQUIPMENT Queens Man Sought to Export Controlled Rifle Scopes and Thermal Imaging Equipment Designed for Military Use**

FOR IMMEDIATE RELEASE

Contact: John Marzulli  
Nellin McIntosh  
United States Attorney’s Office  
(718) 254-6323

Earlier today, Volodymyr Nedoviz, a lawful permanent resident of the United States and citizen of Ukraine, was arrested on federal charges of illegally exporting controlled military technology from the United States to end-users in Ukraine. Federal agents also executed a search warrant at a Philadelphia, Pennsylvania location that was used in connection with Nedoviz’s illegal scheme.

Nedoviz is scheduled to make his initial appearance today at 2:00 p.m. at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, before United States Magistrate Judge Ramon E. Reyes, Jr.

The arrest and charges were announced by U.S. Attorney Robert L. Capers of the Eastern District of New York; Acting Assistant Attorney General for National Security Mary B. McCord; FBI Assistant Director in Charge William F. Sweeney, Jr., New York Field Office; Special Agent in Charge Angel M. Melendez, U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) for New York; and Special Agent in Charge Jonathan Carson, U.S. Department of Commerce, Bureau of Industry and Security, Office of Export Enforcement, New York Field Office.

The complaint alleges that the defendant conspired with others located in both Ukraine and the United States to purchase export-controlled, military-grade equipment from sellers in the United States and to export that equipment to Ukraine without the required licenses.

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The devices obtained by the defendant and his co-conspirators included some of the most highly powerful and technologically sophisticated night vision rifle scopes and thermal imaging equipment available, including, among others, an Armasight Zeus-Pro 640 2-16x50 (60Hz) Thermal Imaging weapons sight, a FLIR Thermosight R-Series, Model RS64 60 mm 640x480 (30Hz) Rifle Scope, and a ATN X-Sight II 5-20x Smart Rifle Scope. In many cases, the devices purchased by the defendant and his co-conspirators retail for almost \$9,000, and they are specifically marketed to military and law enforcement consumers.

As part of the conspiracy, in order to induce U.S.-based manufacturers and suppliers to sell them the export-controlled devices and to evade applicable controls, the defendant and his co-conspirators falsely purported to be United States citizens and concealed the fact they were exporters. The defendant and his co-conspirators also recruited, trained, and paid other U.S.-based individuals to export the controlled devices to Ukraine via various freight forwarding companies. Among other things, the defendant and his co-conspirators instructed the U.S.-based individuals to falsely describe the nature and value of the equipment they were attempting to export. In addition, to conceal their identities, as well as the true destination of the rifle scopes and thermal imaging equipment, the defendant and his co-conspirators instructed that the items be shipped using false names and addresses.

The export of military-grade rifle scopes and thermal imaging equipment requires a license from either the United States Department of State or the United States Department of Commerce. Both the Department of State and the Department of Commerce have placed restrictions on the export of items that they have determined could make a significant contribution to the military potential and weapons proliferation of other nations and that could be detrimental to the foreign policy and national security of the United States.

“The defendant tried to circumvent laws that protect our national security by preventing specialized technologies from falling into the wrong hands,” said U.S. Attorney Capers. “Those who seek to evade the scrutiny of U.S. regulatory and law enforcement agencies by operating in the shadows present a danger to our national security and our allies abroad. We will continue to vigorously prosecute violations of our laws that help maintain the superiority of our armed forces on land, sea, and air.” Mr. Capers expressed his grateful appreciation to the FBI’s Joint Terrorism Task Force.

“Export controls on military technology and equipment are put in place so military-grade gear doesn’t end up in the wrong hands. As we alleged, Nedoviz colluded with co-conspirators to illegally purchase highly powerful, technologically sophisticated equipment intended for law

enforcement and military and then export to Ukraine without the proper licenses. The FBI will continue to protect our national security assets as we work with our partners to prevent the exportation of restricted materials,” said Sweeney, FBI Assistant Director in Charge, New York Field Office.

“Nedoviz, a Ukrainian national, falsely pretended to be a citizen of the United States in order to purchase highly sensitive military grade equipment, that would later be illegally exported to Ukraine” said Melendez, Special Agent in Charge, Melendez of HSI New York. “These items including rifle scopes and thermal imaging equipment have strict export controls in order to make sure that our soldiers overseas never have to encounter them on the battlefield. It is a mission we at HSI take very seriously.”

“Today’s arrest demonstrates the Office of Export Enforcement’s strong commitment to enforcing our nation’s export control and public safety laws. We will continue to work with our law enforcement partners to keep the most sensitive goods out of the most dangerous hands,” said Special Agent in Charge Carson, U.S. Department of Commerce Bureau of Industry and Security, Office of Export Enforcement, New York Field Office.

If convicted of the charges, the defendant faces up to 20 years in prison and a \$1 million fine.

The case is being handled by the Office’s National Security and Cybercrime Section. Assistant U.S. Attorneys Peter W. Baldwin and Michael Keilty are in charge of the prosecution, with assistance from Trial Attorney David Recker of the National Security Division’s Counterintelligence and Export Control Section.

**The Defendant:**

VOLODYMYR NEDOVIZ

Age: 32 Queens, New York

E.D.N.Y. Docket No. 17-M-208

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## Wearable Technologies Market Ready to Charge Into the Multi-Billion Dollars Zone

The trend toward separating computing and sensing technology is accelerating, enhanced by the shrinking size of components that provide the user with far superior capacity than similar components of greater size and power demand. The U.S. Government has invested billions of dollars annually over the last decade in R&D with a corresponding push to patent and transition technology into programs of record and/or commercial products. They are seeking commercial partners and opening their patent portfolio for licensing deals.



The result is that, over the coming decade, the world's wearable technologies market is expected to grow at a cumulative CAGR of nearly 40%, producing a total global market of nearly \$8 billion.

That is one conclusion from an exhaustive analysis of the military and commercial wearable technology market, led by Dr. Bruce Floersheim, the COO of GO XTUDIO ([www.goxtudio.com](http://www.goxtudio.com)) and the Director of Operations for the Wearable Robotics Association ([www.wearablerobotics.com](http://www.wearablerobotics.com)).

Wearables include a host of technologies being integrated into the 'Soldier System' and into a variety of other civilian systems and components in ways not previously possible. These technologies actively enhance safety, situational awareness (local and global) and operational performance.

This multiple-scenario Market Forecast report presents a summary and assessment of current commercial and military wearable technologies, their projected evolutionary paths over the next decade, and the implications of both technical and political influence on the global markets.

## Exporter Of Microelectronics To Russian Military Sentenced To 135 Months In Prison Following Convictions On All Counts At Trial

Earlier today in United States District Court in Brooklyn, Alexander Posobilov was sentenced to 135 months' imprisonment for conspiring to export and illegally exporting controlled microelectronics to Russia, as well as for conspiring to launder money.

Posobilov, together with ten other individuals and two corporations – ARC Electronics, Inc. (ARC) and Apex System, L.L.C. (Apex) – were indicted in October 2012. Posobilov and two co-conspirators were subsequently convicted at trial on all counts in October 2015. Of the remaining defendants, five pleaded guilty and three remain at large. ARC is now defunct, and Apex, a Russian-based procurement firm, failed to appear in court.

The sentence was announced by Robert L. Capers, United States Attorney for the Eastern District of New York, and Acting Assistant Attorney General for National Security Mary B. McCord.

"Posobilov helped lead a criminal operation that through lies and subterfuge profited handsomely from the unlawful sale and export of sophisticated American microelectronics for use by the Russian military," stated United States Attorney Capers. "Today's sentence shows that those who compromise the national security of the United States for their personal financial gain will face serious punishment." Mr. Capers extended his grateful appreciation to the Federal Bureau of Investigation, Houston Field Office and the Department of Commerce for their leading roles in the investigation.

"With this sentence, Alexander Posobilov is being held accountable for evading export laws and illegally exporting American microelectronics to Russia for military use," said Acting Assistant Attorney General McCord. "Export laws exist as an important part of our national security framework and protecting national assets from ending up in the hands of our potential adversaries is one of our highest priorities."

Posobilov joined ARC in 2004, where he ascended to become the procurement manager and day-to-day director of the company. Between approximately October 2008 and October 2012, managed a team of employees who worked to obtain advanced, technologically cutting-edge microelectronics from manufacturers and suppliers located within the United States

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and to export those high-tech goods to in Russia, while evading the government licensing system set up to control such exports. These commodities have applications and are frequently used in a wide range of military systems, including radar and surveillance systems, missile guidance systems and detonation triggers. Russia was not capable of producing many of these sophisticated goods domestically. Between 2002 and 2012, ARC shipped approximately \$50,000,000 worth of microelectronics and other technologies to Russia. ARC's largest clients were certified suppliers of military equipment for the Russian Ministry of Defense.

To induce manufacturers and suppliers to sell these high-tech goods to ARC, and to evade applicable export controls, Posobilov and his co-conspirators provided false end user information in connection with the purchase of the goods, concealed the fact that they were exporters, and falsely classified the goods they exported on export records submitted to the Department of Commerce.

Ultimate recipients of ARC's products included a research unit for the Russian FSB internal security agency, a Russian entity that builds air and missile defense systems and another that produces electronic warfare systems for the Russian Ministry of Defense.

Today's sentencing took place before United States District Senior Judge Sterling Johnson, Jr.

The government's case is being handled by the Office's National Security & Cybercrime Section. Assistant United States Attorneys Richard M. Tucker and Una A. Dean, as well as Trial Attorney David Recker from the National Security Division's Counterintelligence and Export Control Section, are in charge of the prosecution. Assistant United States Attorney Claire Kedeshian is handling the forfeiture aspects of the case.

The Defendant:

ALEXANDER POSOBILOV

Age: 62

Houston, Texas

E.D.N.Y. Docket No. 12 CR 626 (SJ)

## Eleven Individuals and One Company Charged in Florida With Exporting Prohibited Articles to Syria

Ali Caby, a/k/a "Alex Caby," 40, a U.S. permanent resident currently residing in Bulgaria; Arash Caby, a/k/a "Axel Caby," 43, of Miami, Florida; and Marjan Caby, 34, of Miami, Florida, were arrested and charged with exporting prohibited articles to Syria, in violation of the Syria trade embargo, commerce regulations and a U.S. Department of Treasury designation based on an Indictment charging eleven individuals and one foreign company. The defendants were charged by indictment for their alleged participation in a conspiracy to violate the International Emergency Economic Powers Act (IEEPA), the Export Administration Regulations (EAR), and the Global Terrorism Sanctions Regulations by exporting dual-use goods, that is, articles that have both civilian and military application. The dual-use goods were exported to Syrian Arab Airlines, the Syrian government's airline, which is an entity designated and blocked by the U.S. Department of the Treasury's Office of Foreign Assets Control for transporting weapons and ammunition to Syria in conjunction with Hizballah, a terrorist organization, and the Iranian Revolutionary Guard Corps (IRGC). Also charged in the indictment were Adib Zeno, Rizk Ali, Ammar Al Mounajed, Zhelyaz Andreev, Mihaela Nenova, Lyubka Hristova, Iskren Georgiev, Ivan Sergiev, and Syrian Arab Airlines, a/k/a "Syrian Air."

The announcement was made by Acting Assistant Attorney General for National Security Mary B. McCord, U.S. Attorney Wifredo A. Ferrer for the Southern District of Florida, Special Agent in Charge George L. Piro of the FBI's Miami Field Office, Special Agent in Charge Robert Luzzi of the Department of Commerce's Office of Export Enforcement (DOC) Miami Field Office and Special Agent in Charge Mark Selby of U.S. Immigration and Customs Enforcement's Homeland Security Investigations (ICE-HSI).

Specifically, the defendants are charged with: conspiracy to violate to IEEPA and to defraud the U.S. Government, in violation of Title 18, U.S. Code, Section 371; substantive violations of IEEPA and the EAR, specifically Title 15, Code of Federal Regulations, Part 746.9(a), regarding the Syrian Embargo; smuggling goods from the U.S., in violation of Title 18, United States Code, Section 554(a); submitting false or misleading export information, in violation of Title 13, U.S. Code, Section 305; conspiracy to commit money laundering, in violation of Title 18, U.S. Code, Section 1956 (h); and false statements, in violation of Title 18, U.S. Code, Section 1001.

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According to court documents, Ali Caby ran the Bulgaria office of AW-Tronics, a Miami, Florida export company that was managed by Arash Caby, and which shipped and exported various aircraft parts and equipment to Syrian Arab Airlines. Marjan Caby, AW-Tronics' export compliance officer and auditor, facilitated these exports by submitting false and misleading electronic export information to federal agencies. All three defendants closely supervised and encouraged subordinate employees of AW-Tronics in the willful exportation of the parts and equipment to Syrian Arab Airlines, whose activities have assisted the Syrian government's violent crackdown on its people.

An indictment is a formal charging document notifying the defendant of the criminal charges. All persons charged in an indictment are presumed innocent until proven guilty in a court of law.

Mr. Ferrer commended the investigative efforts of the FBI, DOC, ICE-HSI, Defense Criminal Investigative Service and U.S. Customs and Border Protection. The case is being prosecuted by Assistant U.S. Attorney Ricardo Del Toro of the Southern District of Florida and Trial Attorney Matthew Walczewski of the Counterintelligence and Export Control Section of the Department of Justice's National Security Division.

## COUNTERINTELLIGENCE & ECONOMIC ESPIONAGE

### Trade Shows Are Easy Targets for Foreign Intelligence Breaches

By James Lint Faculty Member, School of Business, American Military University Senior Editor for In Cyber Defense and Contributor, In Homeland Security

Trade shows are like playing poker with your competition standing over your shoulder or like a library with no library cards. Everything is easily available and there is lots of free information. The question is: who benefits from all this information?

A trade show offers a startup company an opportunity to make its new product a household name. It also facilitates networking opportunities for a marketing department looking for new business. In addition, a trade show is the perfect opportunity for business executives to learn if there are markets for a niche item they produce.

However, trade shows are also open venues for industrial spying by unfriendly nations seeking U.S. technology.

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### Intelligence Services View of Trade Shows

The Bureau of Industry and Security of the U.S. Department of Commerce has control over what is authorized for sale to overseas companies. The Export.gov website has a Consolidated Screening List.

The CSL includes parties for which the United States maintains restrictions on certain exports, re-exports or transfers of items.

Because people and companies from specific countries are restricted from purchasing certain business lines, they may look for other opportunities for acquisition.

It would make no sense for the U.S. to sell elements of stealth technology to countries that wish to harm America. No country would sell missile technology to its enemies. So foreign intelligence entities (FIEs) look for other opportunities to acquire U.S. technology they cannot acquire through legitimate sales.

Trade shows provide an opportunity for those entities to see technology that they cannot purchase legitimately.

### Techniques of Illicit Collection Vary, but the Goal Is the Same

The FBI pamphlet, "Counterintelligence Concerns for Trade Shows and Industry Events," is designed to improve counterintelligence awareness of American citizens and companies by describing many of the collection activities FIEs conduct.

For example, one foreign agent dipped his tie into a beaker containing a solution used in a product demonstration at the company's booth. That allowed his nation later to test the solution in a laboratory and gain a technological advantage through reverse engineering. A company representative's "simple mistake" of not maintaining vigilance in the display booth proved to be a loss for a U.S. company.

Everyone knows that the informal side meetings at trade shows can often be more valuable than keynote events. In one case, it certainly was more valuable for the Russians. Russian intelligence officer Evgeny Buryakov specialized in economic intelligence. Under unofficial cover as a Russian banker, he attended confidential meetings at a trade association conference and learned information that the Russian government was not authorized to know.

During an international arms exhibition, Chinese nationals were discovered taking notes and videotaping every display. The group also stole a video that revealed the U.S. Theater High Altitude Air Defense System (THAAD), which a Defense Department contractor left unprotected. Among other features, THAAD protects South Korea from North Korean missiles.

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Currently, China is pressuring Seoul to prevent the deployment of THAAD in South Korea because of THAAD's ability to observe aviation threats at great distances. Because of Chinese intelligence collection, Beijing knows THAAD's capabilities and does not want the system nearby.

Often, trade show vendors do not want their booths photographed. But sometimes foreign intelligence personnel photograph the people in the booth to gain identification information for possible recruitment. In addition, they obtain ID information through the common trade show practice of exchanging business cards.

By learning who the technical experts at various companies are, FIEs gain an advantage for future intelligence targeting. Although this method of information collection could be considered a human intelligence targeting operation, it could also assist future targeting of company communications, including email intrusions. In fact, some companies report an increase of computer intrusions after a trade show.

#### **Extensive Scope of Trade Show Espionage**

In an annual report to Congress on foreign economic collection and industrial espionage, the Office of the National Counterintelligence Executive stated: "Entities from a record number of countries — 108 — were involved in collection efforts against sensitive and protected US technologies in FY 2005, according to evidence amassed by the Counterintelligence (CI) Community. A relatively small number of countries, though — including China and Russia — were the most aggressive and accounted for much of the targeting, just as they have since the CI Community first began systematically tracking foreign technology collection efforts in 1997."

The FBI offers pamphlets and online counterintelligence documents to help companies safeguard their information and personnel. Protecting intellectual property (IP) is important for the future of the United States and American business. Contact your local FBI office and ask for the Counterintelligence Coordinator.



## **Sanctions Highlight China-Iran Missile Connection**

The Trump administration recently imposed sanctions on Iran for its missile test, and the sanctions reveal that Tehran's missile program is backed by covert assistance from China. The Treasury Department's Office of Foreign Assets Control, which enforces U.S. sanctions, said last week that a "Chinese-based network" was helping procure goods for Iran's ballistic missile program.

The sanctions designated 13 people and 12 companies who were placed under the Treasury restrictions that prohibit any U.S. companies from doing financial transactions with them. The action followed a flight test Jan. 29 of an Iranian medium-range missile that failed a short time after launch.

The sanctions were unusual for identifying two Chinese nationals, Xianhua Jack Qin and Yaodong Richard Yue. Also named was Carol Zhou, also believed to be part of the Chinese procurement network but whose nationality was not disclosed by Treasury.

Additionally, two Chinese companies were targeted: Ningbo New Century Import and Export Co. Ltd, based in the eastern port city of Ningbo and managed by Mr. Qin; and Cosailing Business Trading Co. Ltd. based in Qingdao. Mr. Yue told the Reuters news service that he is with Cosailing and had his bank account frozen.

"I export to lots of countries, and Iran is a customer too. That's totally normal," Mr. Yue said.

Cosailing trades in a variety of products including industrial machinery and furnaces. An internet search indicates Mr. Qin is Ningbo's manager and that it manufactures commutators for electric motors and electrical tools, as well as vehicle parts. China's backing of Iran's missile program was detailed in leaked State Department cables made public on the anti-secrecy website WikiLeaks.

The cables reveal that Chinese firms have provided a range of missile-related goods including specialty steel, accelerometers, ball bearings and gyroscopes.

Iran's Shahid Bakeri Industrial Group has acquired Chinese-made graphite cylinders, tungsten powder and tungsten copper-alloy ingots. The group is in charge of Iran's solid-propellant ballistic missile program.

A report on Iran's ballistic missile program from 2008 states that Tehran was developing several medium-range ballistic missiles, including the deployed Shahab-3 with a range of 800 miles; an improved Shahab-3 with a range of 1,242 miles; and

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the Ghadr-1 with a range of 1,100 miles. Another medium-range

missile is the Seijil, with a range of 1,200 miles.

A 2009 State Department cable said: "Chinese firms over the past year have offered or sold [Missile Technology Control Regime]-controlled and non-annex items to ballistic missile-related entities in foreign countries, including Iran, Pakistan, and Syria. In some cases, sales have continued despite extensive information provided by the U.S. to Chinese authorities outlining our concerns about these firms' activities."

The transfers have violated U.S. nonproliferation laws, the U.S. government says. CI Strategic Partnership Newsletter Page 5

"Iran's continued support for terrorism and development of its ballistic missile program poses a threat to the region, to our partners worldwide, and to the United States," acting OFAC Director John E. Smith said in a statement Jan. 3. The sanctions are aimed at countering "Iranian malign activities," he added. "We will continue to actively apply all available tools, including financial sanctions, to address this behavior," he said

## Android Ransomware Attacks Have Grown by 50 Percent in a Year

February 21, 2017

Cybercriminals are increasingly targeting mobile devices with malicious software, as more and more people use them to store their most personal data.

Ransomware targeting Android users has increased by over 50 percent in just a year, as cybercriminals increasingly take aim at what they view as an easy ecosystem to penetrate.

This, the highest number of attempts to infect Android smartphones and tablets with malicious file-encrypting software so far, comes as users increasingly turn to mobiles as their primary devices, storing more and more valuable data on them.

According to cybersecurity researchers at ESET, the biggest spike in ransomware attacks came in first half of 2016. And because ransomware was then a relatively new attack vector - at least when it came to targeting businesses -- means many fell foul of it.

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Eastern Europe was initially the main target of ransomware distributors but this has changed, with figures in ESET's Trends in Android Ransomware paper suggesting that now 72 percent of successful ransomware attacks distributing Lockerpin ransomware target users in the United States.

The reason for the shift in targeting, as with most other cybercriminal decision making, comes down to money. Mobile users in the US are richer than those in Eastern Europe, so distributors of ransomware can make more money by targeting them.

## 1st 3D-printed aircraft component takes to skies at FRCSE

Military pilots have to stay cool under pressure, and the first 3D-printed component at Fleet Readiness Center Southeast will help them stay that way.

The forearm-length piece of air duct tubing, constructed with a composite material known as Ultem 1085, marked a major step forward for the Navy command that is charged with maintaining, repairing and overhauling aircraft.

"This is an awesome milestone for our facility," said FRCSE Commanding Officer Capt. Chuck Stuart. "It shows the innovative approaches our artisans and engineers incorporate to help support the U.S. military every day."

The facility's first 3D printer became operational in June 2014. Since then, artisans and engineers have put it to good use making parts for support equipment, for prototypes to save on costly material and for tooling – but never before for an actual piece of an aircraft.

That all changed in January when Matthew Hawn, an aerospace engineer at the facility's trainer aircraft program, sought help from the manufacturing department after the original manufacturer of the T-44 Pegasus exhausted its supply of a piece of air duct used to circulate air throughout the planes cockpit. Randy Meeker, a tooling maker at the facility who runs the 3D printer, put forth another option.

"We went over to manufacturing and took a look at making a vacuum form of the tube, which is how the original part was made," Hawn said. "Then Randy brought up the possibility of 3D printing the part.

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“From there, the cost analysis between the two showed 3D printing was cheaper and offered a better material.”

Not only did Meeker replicate the piece using the 3D printer, he improved on the design.

“The original piece was made out of two pieces of clear plastic tubing that had a flange all the way down its length,” he said. “I redesigned it to work better than the plastic model.”

“It didn’t need to be two pieces when I could print it as one piece.”

Meeker, who works as a pit crewman on a racing team, said some teams have begun printing parts for race cars. However, the process for an aircraft demands a bit more caution because the plane most likely won’t be on the ground if a part fails.

“There is a lot of responsibility on the engineer for these parts that are actually used in aircraft,” he said. “It’s a whole new world of technology, and it’s their responsibility to make sure it can be used safely.”

“That’s why this particular project was a good first candidate because it’s not a flight-critical part, but it’s a step forward in incorporating 3-D printed parts into aircraft.”

## Rolls-Royce AE Engine Family Hits 70 M Flight Hours

The Rolls-Royce AE engine family has topped 70 million engine flight hours, amassing a record of dependable and efficient service across military and commercial fleets in the US and around the world.

Rolls-Royce AE engines power C-130Js, V-22s, Global Hawks and a number of military, corporate and regional aircraft. They are in service with the US Air Force, Marines, Navy, Coast Guard, NASA and multiple military and civil customers around the world.

The AE engine line began as a powerplant for the V-22 tiltrotor aircraft for the US Marine Corps and US Air Force Special Operations Command, with first flight of the V-22 in 1989. Derivatives of the engine soon found their way onto other aircraft as the power and dependable design proved adaptable. All Rolls-Royce AE engines share a common engine core, and are about 80 percent common in their manufacture.

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The result is a powerful and reliable engine, produced cost-effectively on one engine assembly line at the Rolls-Royce facility in Indianapolis, US. Rolls-Royce has delivered more than 6,500 AE engines for a variety of platforms.

Phil Burkholder, Rolls-Royce, President Defense Aerospace, said: “The versatility and dependability of the Rolls-Royce AE engine family is legendary, and has been proven in more than 70 million flight hours in military and commercial service around the world. And there’s more innovation to come: an AE 1107 engine will provide the power for the new DARPA X-Plane.”

The AE engine family includes:

AE 1107: Powers the V-22, Aurora LightningStrike (DARPA X-Plane) and US Navy Ship-to-Shore Connector.

AE 2100: Powers the C-130J, C-27J, Japan’s US-2, LM-100J and Saab 2000.

AE 3007: Powers the Global Hawk and Triton UAVs, Embraer ERJ and Legacy 600/650, Textron Aviation Cessna Citation X and X+.

## Milrem Exhibits Its Fully Customizable UGV

Milrem, the Estonian defence solutions provider, has joined forces with Raytheon UK, Advanced Electronics Company and IGG Aselsan Systems to deploy their fully modular hybrid unmanned ground vehicle THEMIS in the MENA region.

Together with these strong partners Milrem is exhibiting three different solutions of the world’s first fully modular hybrid unmanned ground vehicle the THEMIS.

Milrem will be represented at the IGG stand with the first weaponized unmanned ground vehicle intended specifically for the UAE market. The vehicle features Milrem’s THEMIS and Aselsan’s SARP remote weapon station. The goal of the two companies is to deploy this vehicle with the UAE GHQ.

Together with the Advanced Electronics Company Milrem is exhibiting the THEMIS as a transport solution intended to carry a squad’s gear. The vehicle is able to carry up to 750 kg of weight and run up to 10 hours.

The third Milrem vehicle can be found at the Estonian Pavilion with other Estonian defence companies. The vehicle there is equipped with the GroundEye, an IED detection device developed by Raytheon UK.

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"The success of Milrem's solutions in the Middle East, Asia as well as USA is a great proof that research and development in a small country like Estonia is very much possible and in a very high level," said Margus Tsahkna, the Defence Minister of Estonia.

"Being represented at three stands with three different companies shows exactly how customizable the first fully modular hybrid unmanned ground vehicle THeMIS is," said Kuldar Väärssi, Chief Executive Officer of Milrem. "One platform can be equipped with specific payloads needed by the region's armies," he added.

In addition to using the THeMIS as an equipment transport, weapon station and IED detection vehicle, the THeMIS can also be used as a medevac, UAV landing and powering platform, a sensor array etc. The vehicle uses one base platform for different applications, lowering maintenance and training costs.

## AF to Retire MQ-1 Predator, Transition to MQ-9 Reaper

For the past 21 years, the Air Force has flown the MQ-1 Predator remotely piloted aircraft in combat, and for the last 10, the MQ-9 Reaper. Combined with a skilled aircrew, these aircraft provide consistent support in daily engagements making an impact downrange.

While the MQ-1 has provided many years of service, the Air Force plans to retire the MQ-1 early next year to keep up with the continuously evolving battlespace environment.

The MQ-9 is better equipped than the MQ-1 due to its increased speed, high-definition sensors and the ability to carry more munitions. These combat attributes allow the MQ-9 to complete a wider array of mission sets, which can help the Air Force stay prepared in the fight.

"When you ask about readiness, you have to ask ready for what?" said Air Force Col. Joseph, the 432nd Operations Group commander. "If we talk about the things we could be ready for and what we should be asking our attack squadrons to do, then transitioning to an all MQ-9 force is imperative for readiness."

### Close Air Support Mission

Current areas of responsibility call upon combat remotely piloted aircraft for more precise close air support engagements from the attack squadrons, a considerable change from the days when unmanned aircraft were used solely for intelligence gathering and real-time reconnaissance.

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"The reason that the MQ-9 has turned into a [close air support] platform, and this is the key point, is the fusion of two things," Joseph said. "The first thing is the technology. We took an airplane and outfitted it with more raw power and capability, but then we did the other half and mated that technology with a professional aircrew."

He also explained a third item, which is the trust developed with combatant commanders and troops on the ground. This confidence, combined with an ever-changing battlefield, spawned increased demand and desire for more combat unmanned aircraft support.

While the MQ-1 and the crews who flew them proved their weapons proficiency, it was never originally designed to carry weapons, resulting in a limited 200-pound payload. The demand for more attack capabilities exceeded the MQ-1's design.

"In the case of the MQ-1, I think we wanted more out of it, but we were at a physical stop on the airplane and needed a new one," Joseph said.

The fresh MQ-9 design picked up where the MQ-1 left off, boasting a nearly 4,000-pound payload and the ability to carry missiles and bombs.

These upgraded capabilities directly impact combat readiness and transitioning to just the MQ-9 will also help the aircrews stay primed and ready to go.

"Having a single aircraft buys more flexibility, simplifies training and logistics and gives our people more [career progression] opportunities," Joseph said. "I can't move my people in between squadrons without paying the penalty of having to train them on another aircraft"

### Money-Saving Change

The Air Force will no longer have to maintain a training pipeline or equipment on two separate aircraft, which also eliminates the cost of operating two different airframes. Instead, everything will be specific to the MQ-9.

The 20th Attack Squadron at Whiteman Air Force Base, Missouri, is making the conversion from MQ-1 to MQ-9.

"Right now the plan is to stop flying the MQ-1 in 2018, and that means we need to get transitioned this year," said Air Force Lt. Col. James, the 20th Attack Squadron commander. "As part of that, we are going to stop flying the MQ-1 completely by July 1, 2017. We will gradually stand up our number of combat lines on the MQ-9, so by the end of the year we are only an MQ-9 squadron."

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What is unique for James' squadron is some of the aircrews are training on the MQ-9 for two to three months, while home-station crews are still flying the MQ-1 in daily combat missions overseas.

"For the better part of the last few months I've had upwards of 30 percent of my squadron gone at any time," James said. "It's been quite a challenge, but the motivation is very high to transition to this more capable airframe, and my squadron is excited to take it to combat."

"We're converting an MQ-1 squadron in combat 24/7/365 to an MQ-9 squadron in combat operations without taking a single day out of combat," Joseph said. "The herculean efforts done by the 20th [Attack Squadron are] nothing short of remarkable."

The 20th Attack Squadron and every unit which flew the MQ-1 achieved significant combat zone effects daily while laying the foundation for future combat unmanned aircraft.



"I think when we look at the legacy of the MQ-1 we're going to be scratching our heads wondering how we did so much with so little," Joseph said. "The men and women flying them starting with two squadrons took a science project and throughout many evolutionary changes made it what it is today."

The MQ-1 began as the RQ-1 Predator, an unarmed unmanned aircraft flown by line-of-sight. Some changes include the adding of the Multi-Spectral Targeting system, the addition of weapons and remote-split operations capability.

"The MQ-1 is a great example where the Air Force took a technology demonstrator and turned it into a major weapons system having daily effects on the battlefield," James said. "We have found how to fly an imperfect weapons system very well, and I think we have maximized the effectiveness that we can get out of the MQ-1. I have no doubt that we will continue to find ways to be more effective in combat with the MQ-9."

James also said the desire for the real-time reconnaissance and persistent strike capabilities that combat unmanned aircraft aircrew provide to the combatant commanders would never stop.

"We're hitting a home run by going to the MQ-9," James said. "We have made a difference."

## How Newark hardware maker Logitech wants to take on Apple and Google

Logitech International CEO Bracken Darrell says he will take on the tech giants by pushing his company further into the smart home sector.

Logitech, which maintains its American headquarters in Newark, has seen stellar sales on accessories that pair with smart devices from the likes of Apple, Microsoft, Amazon and Google. Darrell now plans to compete with those companies by tying together TVs, appliances and voice-controlled devices, according to Bloomberg.

The company has been in good hands with Darrell thus far — the hardware company's stock has quadrupled since Darrell took the reins as CEO in 2013. Darrell believes going forward that Logitech can find profitable niches that won't stir up displeasure among industry leaders.

"There's no way these big players are going to want to be in every little puddle around their operating systems," Darrell told Bloomberg. "We've always been in categories where the big players are."

The company is now researching how gestures can replace computer mice and is working on devices designed for use in self-driving cars, per the report. Logitech is also working on cloud services tied to Logitech products — for example one service would allow a user to store video collected via home-surveillance cameras. Darrell also hopes to move the company into video collaboration and augmented-reality games.

Logitech's keyboards, wireless mice and speakers are currently keeping up with trends in the market. Logitech's UE Boom speakers already understand Apple's Siri and Google Now and the company's remotes employ Amazon's Alexa to control TVs, lights and heating units. Darrell plans to move further into the voice-activated device sector with profits from the company's \$1 billion in sales, per the Bloomberg report. Logitech's revenue is expected to reach \$2.2 billion this year.

But can the company keep up with the very companies it makes accessories for? Logitech devotes less than \$150 million annually to research and development, while Microsoft spent about \$12 billion on R&D last year, Google spends about \$14 billion, and Amazon spends \$16 billion, per Bloomberg.

Darrell spent his first three years at Logitech cutting costs by shutting down and selling its less-profitable businesses. He joined Logitech in 2012 after spending four years at Whirlpool, he also spent time at General Electric Co. and Procter & Gamble Co.

## After Hidden Figures, new program seeks to flood aerospace with women

Lori Garver had just boarded a plane last June when she heard that her young friend, D. Brooke Owens, had passed away. Owens, 35, had had terminal cancer for a long time, but the moment still stung Garver, the former deputy NASA administrator. She'd mentored Owens toward her dream of running an airport, and the two had become close.

During those few minutes before the plane took off, Garver said she just couldn't let it go. So she dashed off an e-mail to friends and colleagues in the aerospace business—chief executives, managers, and bright, young chiefs of staff she'd worked with at NASA and in the White House. Would they be interested in mentoring young women interested in getting into the aerospace industry?

"My goal, sitting on that airplane, was to get five or maybe at most 10 internships," Garver told Ars in an interview. But by the time her flight had landed, Garver's inbox was full with interested companies. Two other close friends of Owens—Cassie Lee, the director of Aerospace Applications at Vulcan, Inc., and William Pomerantz, the vice president of special projects at Virgin Galactic—said they wanted to help organize the program. On Wednesday, less than a year after her passing, the Brooke Owens Fellowship Program launched with 36 paid internships.

Garver said the aerospace industry has a fairly good record with breaking through the glass ceiling. The chief executives of two of the major players in the industry, Lockheed Martin's Marillyn Hewson and Aerojet Rocketdyne's Eileen Drake, are both women. "I think the bigger issue is our raw numbers, because we don't have nearly enough women in any part of the pipeline," said Garver, who served as NASA's deputy administrator from 2009 to 2013 and is now general manager of the Air Line Pilots Association.

"I can say from first-hand experience, if you're in a meeting and you're the only woman there, or just one of a handful, you're much more easily dismissed or ignored," she said. "I watched Hidden Figures and just cried the whole time, that our industry hasn't changed more since then."

Recalling her mentoring experience with Owens, Garver and her cofounders figured the best way to remedy the problem was to bring young women interested in aviation and space exploration into major companies in the field, provide them each with two senior aerospace professionals as mentors, and give them experience. Each class of women will also attend a conference and, Garver hopes, form a cohort that will help them network throughout their careers.

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Ultimately, it didn't prove difficult to find interested CEOs. Companies such as SpaceX, Blue Origin, Virgin Orbit, Orbital ATK, and many more provided internships. Some companies wanted to offer several. "It ended up being an easy sell," Garver said. "It wasn't hard to convince a company to bring in a fantastic young woman."

## Commerce Secretary Wilbur Ross: If we don't use robots, everyone else will

Unlike fellow billionaire Bill Gates, Commerce Secretary Wilbur Ross doesn't see a tax as a solution to the threat of job automation.

"I'm not in favor of trying to hold back technological advance," Ross told CNBC's "Squawk Alley" on Tuesday. "We need technological advance. And if we don't employ robots, the Chinese will, the Vietnamese will, the Europeans will, the Japanese will. Everyone will."

Ross was asked about the idea that income generated by robots should be taxed at similar levels to human income tax — a suggestion Microsoft co-founder Gates made in an interview with Quartz last month.

As a member of the new Republican administration, Ross told CNBC that regulation was not the way to jumpstart America's aspirations to bring back manufacturing jobs. Ross called overregulation the "single most important thing that bars" effective business decisions.

Wilbur Ross, U.S. Secretary of Commerce, speaks during a news conference at the U.S. Department of Commerce in Washington, D.C., U.S., on Tuesday, March 7, 2017. "The right solution is to properly equip the American workforce, not to try to hold back technology," Ross said.

Ross, who made much of his estimated \$2.5 billion fortune by buying distressed businesses, suggested that improvements to the community college system might be one way to equip young people and the middle-aged people "to be part of the workforce of the future." More taxes, on the other hand, might handicap American business, he said.

Despite the shift of power in Washington, Ross' comments came amid bipartisan efforts to retrain U.S. workers. In December, President Barack Obama's administration released a report on artificial intelligence noting that U.S. workers displaced from their jobs have seen substantial and lasting declines in earnings.

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Before taking office, President Donald Trump said he talked to Gates about the issue of automation.

"Right now we don't make the robots," Trump told The New York Times of his conversation with Gates. "We don't make anything. But we're going to, I mean, look, robotics is becoming very big and we're going to do that. We're going to have more factories."

Ross said he would leave it to technology companies to determine the economic benefits of innovations such as space travel. But that doesn't mean he has gone easy on the tech industry.

Ross leveled a hefty punishment against a Chinese smartphone company on Tuesday, saying he was "putting the world on notice."

ZTE agreed to plead guilty and pay about \$900 million to the United States to settle allegations that it violated American laws on selling U.S. technology to Iran in violation of U.S. sanctions. It has agreed to pay another \$300 million, suspended during a seven-year period, if it does not hold up its part of the agreement.

"Industrial power is, at the end of the day, a national security issue," Ross said.

## **Aerospace Composites Market Estimated to Reach US\$ 24.8 Bn by 2024; Global Industry Analysis 2016 - 2024: Transparency Market Research**

Transparency Market Research has published a new report titled "**Aerospace Composites Market- Global Industry Analysis, Size, Share, Growth, Trends, and Forecast, 2016-2024.**" According to the report, the global aerospace market was valued at US\$ 11.5 Bn in 2015 and is anticipated to reach US\$ 24.8 Bn by 2024, expanding at a CAGR of 9.1 % between 2016 and 2024.

Aerospace composite materials are the composite materials which are used in the aviation industry due to their attractive mechanical and chemical properties. Carbon fiber composites and glass fiber composites are the commonly used composites in aero structures. Due to their key properties such as low density, low carbon emission and high fuel efficiency, carbon fiber composites are preferred to other composites. Major applications of aerospace composites are in commercial & business aircraft, helicopters, military and space sectors. Increasing air passenger traffic, emerging economies, growing number of low cost carriers, increased competition among global aircraft leaders are driving the market for aerospace composites market.

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Based on the product type, global aerospace composites market is segmented into carbon fiber composites, glass fiber composites, aramid fiber composites and others which include ceramic and metal fiber composites. Carbon fiber composites accounted for more than 55% share of the total aerospace composites demand in 2015. The production of carbon fiber composites is a complex undertaking as it takes number of intermediate steps to complete the process. Other composites such as glass fiber composites, aramid fiber composites and others are comparatively easy to manufacture. However, these are unlikely outperform carbon fiber composites in terms of fuel efficiency and low carbon emissions.

In terms of applications, aerospace composites market has been categorized into commercial & business aircraft, helicopters, military and space. In the present market scenario, commercial & business aircraft is the leading application segment with more than 50% of the market share. Helicopter segment is also on the path of progress. Space and military are the two sectors that are expected to have faster growth in the forecast period due to increasing investments in the military and space sectors.

In terms of volume, North America accounted for a significant share in aerospace composites market in 2015 followed by Europe. This trend is expected to continue during the forecast period due to the increasing demand for composites with low carbon emissions and high fuel efficiency. Fleet expansion in North America and growing demand for domestic aviation in Europe are expected to propel the aerospace composites market in these regions. Further rise in air passenger traffic is expected to fuel the aerospace composites market in Asia Pacific. Policy of liberalization, impressive investments in the military and space programs are anticipated to propel the market in the region. Growing number of low cost carriers in Latin America indicates further market opportunities for aerospace composites in the region. Middle East & Africa, geographically an international connectivity hub is also expected to witness an impressive growth opportunity for aerospace composites market.

Major players operating in the aerospace composites market includes Cytec Solvay Group, Hexcel Corporation, Koninklijke TenCate, Toray Industries Inc., SGL-The Carbon Company, Huntsman International LLC

The Aerospace Composites market has been divided into the following segments.

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### Aerospace Composites Market - Product Type Analysis

- Carbon Fiber Composites
- Glass Fiber Composites
- Aramid Fiber Composites
- Others

### Aerospace Composites Market - Application Type Analysis

- Commercial & Business aircraft
- Military
- Helicopters
- Space

### Aerospace Composites Market - Regional Analysis

- **North America**
  - U.S.
  - Canada
- **Europe**
  - Germany
  - France
  - U.K.
  - Italy
  - Spain
  - Rest of Europe
- **Asia Pacific**
  - China
  - India
  - Japan
  - ASEAN
  - Rest of Asia Pacific
- **Middle East & Africa**
  - GCC
  - South Africa
  - Rest of Middle East & Africa
- **Latin America**
  - Brazil
  - Mexico

## Training

BIS Seminars – Denver, CO and San Diego, CA Registration is now open for “Complying with U.S. Export Controls” seminars in Denver, CO and San Diego, CA.

- March 22 and 23, 2017, Denver, CO Click here to register: <http://wtcdenver.org/event-2383326?CalendarViewType=1&SelectedDate=3/28/2017>

- April 11 and 12, 2017, Coronado (San Diego), CA Click here to register: <https://www.regonline.com/Registrar/Checkin.aspx?EventId=1848598>

“Complying with U.S. Export Controls” is a two-day program led by BIS's professional counseling staff and provides an in-depth examination of the Export Administration Regulations (EAR). The program will cover the information exporters need to know to comply with U.S. export control requirements. Presenters will conduct a number of "hands-on" exercises that will prepare you to apply the regulations to your own company's export activities. Continuing legal education credit (MCLE) is available, and varies with the length of each seminar, for California State Bar members. For additional details on these seminars, please contact the BIS Western Regional Office at 949-660-0144 or 408-998-8806.

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Create it.”