

US

NOAA Amends Licensing of Private Remote Sensing Space Systems

On May 20, 2020, the US Department of Commerce's (Commerce) National Oceanic and Atmospheric Administration (NOAA) [published](#) in the *Federal Register* a Final Rule and request for comments on new regulations on the licensing policy of private remote sensing space systems. The new Final Rule follows a proposed rule that Commerce published in the *Federal Register* on May 14, 2019 (84 FR 21282). The new regulations overhaul the existing licensing regime (15 CFR part 960) and seek to increase transparency with respect to the licensing process for private remote sensing systems. This Final Rule takes effect on July 20, 2020, unless, if at the end of congressional review the effective date has been changed, then Commerce will publish in the *Federal Register* a document establishing the actual effective date. Additionally, Commerce will accept comments on the Final Rule until June 19, 2020.

Remote Sensing Space Systems

Remote sensing space systems use satellites to detect and classify objects on Earth. Remote sensors scan objects and areas by detecting and measuring radiation that is reflected or backscattered from the object. Remote sensors are capable of collecting data of dangerous or inaccessible areas. Examples of such remote sensing systems include synthetic aperture radar (SAR) and hyperspectral imaging (HIS).

Existing Licensing Regime

The Land Remote Sensing Policy Act of 1992 (LRSPA) charged the Secretary of Commerce with the responsibility of fulfilling the US' obligation under Article VI of the Treaty on Principles Governing the Activities of States in the Exploration and Use of Outer Space, including the Moon and Other Celestial Bodies (Outer Space Treaty). This Treaty requires that the activities of non-governmental entities must be authorized and supervised by states that are parties to the Outer Space Treaty. At the time that the LRSPA was enacted, there were no private remote sensing space systems. Since then, the private remote sensing space systems industry has grown.

For example, in 2006, when Commerce last updated its regulations, there were 25 US licenses and 29 non-US systems. In the 14 years since the last update to the regulations, Commerce has issued over 100 licenses, demonstrating the growth in the private US remote space sensing system industry. During that same period, more than 250 non-US remote sensing systems have become or will become operational.

This demonstrates an increase in foreign competition to the US industry. Under the existing licensing regime, license conditions were determined through interagency discussions, without any opportunity for public comment. The existing licensing regime used licensing conditions to address US national security and international policy concerns. Commerce states that it is overhauling the existing licensing regime because it recognizes that foreign competition has grown, and the existing licensing regime places US companies at a disadvantage to their foreign competitors who operate without similar restrictions.

New Licensing Tiers

The Final Rule overhauls the existing licensing regime by categorizing license applicants into one of three tiers based on the availability of their unenhanced data from other sources. Applicants will be categorized as follows:

- If an applicant proposes a system that is capable only of producing unenhanced data substantially the same as unenhanced data available from sources not regulated by Commerce, such as foreign sources, the system will be "Tier 1" and receive minimal license conditions.
- If an applicant proposes a system that is capable of producing unenhanced data substantially the same as unenhanced data available from US sources only, the system will be "Tier 2." Where there is no foreign competition for such unenhanced data, a license condition *could* be effective for purposes of protecting US national security and foreign policy interests.
- If an applicant proposes a system that has no competitors, foreign or domestic, the system will be "Tier 3" and may receive more stringent license conditions.

Under the new licensing regime, Tier 1 systems will receive only those license conditions required by statute and will not be required to comply with limited-operations directives (also known as "shutter control"). Commerce will impose such minimal controls on Tier 1 systems because it recognizes that foreign sources possess the same capabilities as Tier 1 systems, and therefore a limited-operations directive would be less effective in protecting US national security and foreign policy interests because foreign sources would be able to generate such data without similar restrictions from Commerce. Thus, Commerce will not require remote sensing systems whose unenhanced data capabilities are substantially the same as foreign sources that are not subject to Commerce's regulations to comply with shutter control, or with any operational limitations including restrictions on non-Earth imaging (NEI), nighttime imaging and the like.

Tier 2 systems, those with only US-licensed competition, receive the same minimal conditions as the Tier 1 applicant, with the addition of one NEI requirement—Tier 2 systems must receive consent from the owner of any Artificial Resident Space Object (ARSO) orbiting the Earth and to notify the Secretary five days before conducting resolved imaging operations of the ARSO—and the requirement to comply with limited-operations directives. Commerce will require Tier 2 applicants to be prepared to comply with limited-operations directives because, where certain capabilities exist only in systems subject to US jurisdiction, such license conditions will be effective at restricting the dissemination of data and protecting US national security interests or meeting international obligations. With respect to the consent and notification requirement, Commerce will reevaluate the necessity of such requirement in approximately two years, in consultation with the Department of Defense. If Commerce determines that the underlying national security concerns have been abated, Commerce will consider appropriate action, including rulemaking to modify or remove the requirement.

Under the new licensing regime, the Tier 1 and Tier 2 categories are not fixed. Thus, once a non-US-licensed entity, such as a foreign commercial entity, achieves the capability to collect unenhanced data substantially the same as a Tier 2 system, Commerce may re-categorize that system as Tier 1, removing the obligations to address resolved imaging of ARSO and to comply with limited-operations directives.

Tier 3 systems, novel systems without any competitors that can produce substantially the same unenhanced data, will have the same standard conditions as Tier 2, but will also have the potential for temporary, custom license conditions. Such license conditions will be developed by either the Department of Defense or State, as appropriate, and analyzed by Commerce in consultation with the applicant to determine compliance with legal requirements. Such temporary license conditions will last for one year, with the possibility of two additional one-year extensions, if the department requesting the condition meets a burden of proof, following review by Commerce and notification of licensees. The license exceptions may not be extended further, except upon an additional extension request by the Secretary of Defense or State. The Final Rule states that the Secretary of Defense or State may not delegate such authority.

The temporary license restrictions that may be imposed on Tier 3 systems no longer protect US national security concerns by imposing indefinite restrictions on US private remote sensing systems. Rather, Tier 3 license restrictions shift toward ensuring the US Government has sufficient time to mitigate any harm that could result from remote sensing operations where possible. Once the temporary license restrictions are lifted, the system can operate unimpeded by those temporary restrictions.

BIS Makes Additions to Entity List

On June 5, 2020, BIS published in the *Federal Register* two separate Final Rules adding entities to and revising the entries for existing entities on the Entity List (85 Fed. Reg. 34503; 85 Fed. Reg. 34495). The [first Final Rule](#) (Rule 1) amends the Export Administration Regulations (EAR) by adding nine entities, modifying the entries for two entities, and revising one entry on the Entity List. The [second Final Rule](#) (Rule 2) also amends the EAR by adding 24 entities under 25 entries to the Entity List.

Designation of an organization on the Entity List does not block all dealings with the organization, as would occur for an organization designated as a Specially Designated National (SDN) by the Office of Foreign Assets Control (OFAC). The Entity List is more targeted in its application. Section 744.16(a) of the EAR provides that no person may “export, reexport, or transfer (in-country) items specified on the Entity List to listed entities without a license from BIS.” For all entities being added to the Entity List, the “items specified” are all items subject to the EAR. Therefore, the designation prohibits all unlicensed exports, reexports or transfers to any of those entities of any item subject to the EAR by any person – both US persons and non-US persons.

While the EAR does contemplate that a license could be obtained to export, reexport or transfer items subject to the EAR, for Rule 1, the Entity List establishes a license review policy of case-by-case review for Export Control Classification Numbers (ECCNs) 1A004.c, 1A004.d, 1A995, 1A999.a, 1D003, 2A983, 2D983, and 2E983. Additionally, a case-by-case review policy also applies to EAR99 items that are described in the Note to ECCN 1A995, specifically, items for protection against chemical or biological agents that are consumer goods, packaged for retail sale or personal use or medical products. For all other items subject to the EAR, BIS adopts a license review policy of presumption of denial. For Rule 2, BIS establishes a license review policy of presumption of denial.

For the entities added to the Entity List in both Rule 1 and Rule 2, shipments of items removed from eligibility for a License Exception or for export or re-export without a license (NLR) as a result of this Final Rule that were *en route* aboard a carrier to a port of export or re-export, on June 5, 2020, pursuant to actual orders for export or re-export to a foreign destination, may proceed to that destination under the previous eligibility for a License Exception or export or re-export without a license (NLR). For Rule 2, shipments of items exported, re-exported or transferred (in-country) under the authority of a BIS license that were *en route* aboard a carrier to a port of export or re-export, on June 5, 2020, pursuant to actual orders for export or re-export to a foreign destination, may proceed to that destination under the authorization of the issued license.

The full list of entities added to the Entity List pursuant to Rule 1 is as follows:

China

- Aksu Huafu Textiles Co., including two aliases (Akesu Huafu and Aksu Huafu Dyed Melange Yarn)
- CloudWalk Technology, including four aliases (Chongqing Cloudwalk Technology Co., Ltd.; Guangzhou Yunshang Information Technology Co., Ltd.; Yun Cong Information Technology Co. Ltd.; and Yun Cong Technology)
- FiberHome Technologies Group, including eight aliases (FiberHome; FiberHome International Technology Co., Ltd.; FiberHome Networks; FiberHome Networks Co. Ltd.; FiberHome Telecommunication Technologies Co., Ltd.; Haohuo Xiangyun Network Technology Co., Ltd.; Wuhan Fiberhome International; and Wuhan Institute of Posts and Telecommunications)
- Intellifusion, including two aliases (Shenzhen Yuntian Lifei Technology Co., Ltd. and Yuntian Lifei)
- IS'Vision, including six aliases (Chengdu Yinchen Netcom Technology Co., Ltd; Isvision Tech; Isvision Technologies Co., Ltd.; Shanghai Is'vision Co.; Shanghai Isvision Technologies Co., Ltd.; and Yinchen Technology)
- Ministry of Public Security's Institute of Forensic Science of China, including two aliases (Forensic Identification Center of the Ministry of Public Security of the People's Republic of China and Material Identification Center of the Ministry of Public Security of the People's Republic of China)
- Nanjing FiberHome Starrysky Communication Development Co., including two aliases (Fiberhome StarrySky Co., Ltd. and Nanjing Fenghuo Xingkong Communication Development)
- NetPosa, including three aliases (Dongfang Netpower Technology Co.; Dongfang Wangli Technology; and NetPosa Technologies Ltd.)
- SenseNets, including six aliases (Deep Net Vision; Deep Network Vision; Sensenets Corporation; Shenzhen Net Vision; Shenzhen Shenwang Vision Technology Co., Ltd.; and Shenzhen Vision)

Rule 1 also revises the entries on the Entity List for the following three entities:

China

- Hikvision, by adding an additional name, Hangzhou Hikvision Digital Technology Co., Ltd, and identifying Hikvision as an alias
- SenseTime, by adding an additional name, Beijing SenseTime Technology Development Co., Ltd, an additional alias, Beijing Shangtang Technology Development Co., Ltd., and identifying SenseTime as an alias
- Kezilesu Kyrgyz Autonomous Prefecture Public Security Bureau, by correcting the spelling of the first work of the existing alias, so it correctly reads as Kizilsu Autonomous Prefecture Public Security Bureau

Rule 2 adds the following entities to the Entity List:

China

- Beijing Cloudmind Technology Co., Ltd.
- Beijing Computational Science Research Center
- Beijing Jincheng Huanyu Electronics Co., Ltd.
- Center for High Pressure Science and Technology Advanced Research
- Chengdu Fine Optical Engineering Research Center
- China Jiuyuan Trading Corporation
- Harbin Chuangyue Technology Co. Ltd.
- Harbin Engineering University
- Harbin Institute of Technology
- Harbin Yun Li Da Technology and Development Co., Ltd.
- JCN (HK) Technology Co., Ltd.
- Kunhai (Yanjiao) Innovation Research Institute
- Peac Institute of Multiscale Science
- Qihoo 360 Technology Company
- Shanghai Nova Instruments Co., Ltd.
- Sichuan Dingcheng Material Trade Co., Ltd.
- Sichuan Haitian New Technology Group Co., Ltd.
- Sichuan Zhonghe Import and Export Trade Co., Ltd.
- Skyeye Laser Technology Limited
- Zhu Jiejing

Hong Kong

- Cloudminds (Hong Kong) Limited
- JCN (HK) Technology Co., Ltd.
- K Logistics (China) Limited

United Kingdom

- Cloudminds Inc.
- Qihoo 360 Technology Co. Ltd.

Rule 2 also revises the Entity List entries for the following entities:

China

- China Electronics Technology Group Corporation 38th Research Institute (CETC 38), by removing one of the addresses: 418 Guilin Road, Shanghai, China
- China Electronics Technology Group Corporation 55th Research Institute (CETC 55), by editing it to identify “NEDITEK,” currently listed as the fourth alias for the entry, as a third subordinate institution under this same entry. This rule also adds an additional address: 2nd Floor, B4 Block, Jiulonghui Park, No. 19 Suyuan Avenue, Nanjing, China
- Chinese Academy of Engineering Physics, by adding three additional addresses: 64 Mianshan Road, Mianyang, Sichuan, China; 6 Huayuan Road, Haidian District, Beijing, China; 1 Fenghao East Road, Haidian District, Beijing, China. Additionally, BIS is modifying an existing address for Chinese Academy of Engineering Physics, to correct a zip code from “6100003” to “610003.” This rule also implements the decision to modify the license review policy for this entry from case-by-case to presumption of denial. Finally, this rule adds “(See § 744.11 of the EAR).” To clarify the license requirement for this entry.

OFAC Announces Settlement Agreement with BIOMIN America, Inc.

On May 6, 2020, OFAC [announced](#) that it reached a settlement agreement with BIOMIN America, Inc. (BIOMIN), an animal nutrition company based in Kansas, to pay US\$257,862 for its potential violation of the Cuban Assets Control Regulations (CACR). According to the announcement, between approximately July 2012 and September 2017, BIOMIN engaged in 30 sales of agricultural commodities produced outside the United States to Alfarma S.A. in Cuba without authorization from OFAC without authorization from OFAC. This, OFAC explains, resulted in 44 apparent violations of the CACR.

OFAC Removes Venezuela-related General License 13E, Announces Other Venezuela-related Updates

OFAC [announced](#) the revocation of Venezuela-related General License (GL) 13E, “Authorizing Certain Activities Involving Nynas AB.” According to OFAC, “Nynas AB has undertaken a corporate restructuring that has resulted in Nynas AB no longer being blocked pursuant to the Venezuela Sanctions Regulations (31 C.F.R. Part 591). This corporate restructuring, among other things, severs control by blocked persons and reduces the interest of blocked persons below 50 percent.” As such, US persons do not require OFAC authorization to engage in transactions with Nynas AB, as long as such transactions do not authorize blocked persons or otherwise prohibited activities. “Absent authorization from OFAC, all U.S. persons continue to be prohibited from engaging in any dealings with Petróleos de Venezuela, S.A. (PdVSA), or any entity in which PdVSA owns, directly or indirectly, a 50 percent or greater interest.”

In order to account for this change related to Nynas AB, OFAC issued [GL 3H](#), “Authorizing Transactions Related to, Provision of Financing for, and Other Dealings in Certain Bonds” and [GL 9G](#), “Authorizing Transactions Related to Dealings in Certain Securities” to remove reference to Nynas AB. It also amended relevant [Frequently Asked Questions](#).

Agencies Issue Guidance to Address Illicit Shipping and Sanctions Evasion Practices

The US Department of State, the US Department of Treasury, and the US Coast Guard have issued a [global advisory](#) to alert the maritime industry and other parties involved to the “deceptive practices used to evade sanctions, with a focus on Iran, North Korea, and Syria.” The advisory includes a set of best practices for private industry to consider adopting in order to mitigate such sanctions risk.

DOJ Extradites Founder and CEO of Iranian Financial Services Firm on Money Laundering, Wire Fraud and Conspiracy Charges

On May 18, 2020, the Department of Justice (DOJ) [announced](#) a six-count federal indictment against Seyed Sajjad Shahidian, Vahid Vali and PAYMENT24 for conducting financial transactions in violation of US sanctions against Iran. The charges included conspiracy to commit offenses against and to defraud the US, wire fraud, money laundering and identity theft.

According to the indictment, PAYMENT24 was an internet-based financial services company with approximately 40 employees and offices in Tehran, Shiraz, and Isfahan (all Iran). PAYMENT24 helped Iranian citizens conduct financial transactions prohibited under US sanction law. According to the company’s website, for a fee, PAYMENT24 facilitated clients in circumventing US sanctions. As part of the scheme, Shahidian and Vali made material misrepresentations and omissions to US-based businesses regarding the destination of the US-origin goods and obtained payment processing accounts from US-based companies using false information and documents.

DOJ Seeks Forfeiture of More than US\$20 Million in Assets Relating to Unlawful Use of US Financial System to Evade and Violate Iranian Sanctions

On June 3, 2020, DOJ [filed](#) a forfeiture complaint alleging Kenneth Zong, a US citizen, conspired with three Iranian nationals to evade US sanctions against Iran. The fraudulent transactions were allegedly designed to unlawfully convert and remove Iranian owned funds in a Korean financial institution, equivalent to approximately US\$1 billion. Approximately US\$20 million in funds traced to this scheme were used by Zong’s co-conspirators to attempt to purchase a hotel in Tbilisi, Georgia in 2011 and 2012. The proceeds of these traced funds and this attempted transaction are the subject of the forfeiture complaint.

EU

Council Imposes Restrictions on Nicaraguan Nationals

On May 4, 2020, the Council of the EU adopted [Council Implementing Regulation \(EU\) 2020/606](#) imposing asset freeze and travel ban restrictions on six Nicaraguan nationals for serious human rights violations in Nicaragua.

Member States Agree to Terminate Bilateral Investment Treaties within the EU

On May 5, member states signed an [Agreement for the termination of Bilateral Investment Treaties between the Member States of the EU](#). This agreement terminated bilateral investment treaties between EU member states excluding those of Austria, Finland, Ireland, and Sweden. The agreement also sets out a structure for pending and prospective investment disputes, i.e., it regulates duties of the contracting parties, provides for transitional measures such as a structured dialogue between disputing parties, and safeguards, under certain conditions, an access to judicial remedies under national law of EU member states, even if the national law time limit has expired.

Commission Issues Plan for Comprehensive Policy on Money Laundering and Terrorist Financing

On May 5, the EU Commission issued a [Communication](#) for a plan for a comprehensive union policy on preventing money laundering and terrorist financing (AML-FT), explaining the six pillars in which the EU will strengthen and enhance its AML-FT policies and regulations. The EU's Joint Action Plan foresees *inter alia* establishing a single EU rulebook, enhancing the coordination and support mechanism for financial intelligence units, and strengthening the international dimension of EU AML-FT laws.

The EU Commission also launched a [public consultation](#) for stakeholder and citizen participation that is open for feedback until July 29, 2020.

Further, the [Delegated Regulation \(EU\) 2020/855](#) updated the list of high-risk countries for AML-FT, listing the following additional countries: Bahamas, Barbados, Botswana, Cambodia, Ghana, Jamaica, Mauritius, Mongolia, Myanmar/Burma, Nicaragua, Panama and Zimbabwe. In addition, the EU delisted Bosnia-Herzegovina, Guyana, Tunisia, Ethiopia, Laos People's Democratic Republic and Sri Lanka from the list of high-risk jurisdictions. The EU Commission also published a [methodology](#) for identification of high-risk third countries based on a mechanism that takes into consideration the EU-Financial Action Task Force interactions, independent evaluation from the EU and consultations and reporting with member states and experts.

See additional information in [our publication](#).

Council Issues Conclusion to the Eastern Partnership Policy

On May 11, the council issued the [conclusions](#) on the Eastern Partnership policy, on the commitment to building a common area of shared democracy, and to a rules based international order, lay and independence.

EU Publishes Guidance on Humanitarian Aid to Sanctioned Countries

On May 11, the EU Commission published a [guidance](#) on how to provide humanitarian aid to sanctioned countries in view of the coronavirus pandemic. The guidance focused on the provision of humanitarian aid in Syria. The EU addresses a number of questions with regards to exports of, payments for and provisions of personal protection equipment, medicines, medical equipment and assistance. The EU Commission intends to facilitate transactions for operators such as national authorities, donors, NGOs, banks and other actors in the humanitarian sector with affected sanctioned or restricted countries.

EU Extends Cyber Sanctions Regime

On May 18, the EU Council [extended](#) cyber sanctions regime for a period of one year. Therefore, the restrictive measures framework for cyber-attacks that constitute an external threat to the EU or its member states will be in place until May 18, 2021.

Commission Imposes Specific Restrictive Measures Against Persons Associated with ISIL and Al-Qaida

On May 26, the [Commission Implementing Regulation \(EU\) 2020/706](#) imposed restrictive measures to additional individuals under Regulation (EC) 881/2002.

Council Aims to Relieve Aviation and Railway Service Providers Impacted by COVID-19

On May 25, the Council adopted [relief measures](#) for [aviation](#) and [railway](#) services supporting the industries from COVID-19 impact, amending air carrier licensing rules and extending transposition deadlines for rail safety, among others.

Council Extends Sanctions on Syria

On May 28, the EU Council [extended](#) sanctions against the Syrian regime until June 1, 2021, maintaining restrictive measures in view of the repression of civil population and the course of the conflict.

Council Extends Sanctions Concerning the Central African Republic

On May 28, the EU [Council Implementing Regulation \(EU\) 2020/717](#) and [Council Implementing Decision \(CFSP\) 2020/720](#) including additional individuals to the restrictive measures list.

Court of Justice Issues Opinion on Case Against Iranian Bank

On May 28, Advocate General Hogan issued an [opinion](#) on Case C-134/19 P with regard to Bank Refah Kargaran's action for damages related to restrictive measures taken against Iran. AG Hogan proposed to the Court of Justice to hold that it has jurisdiction to hear an action for damages with regards to the legality of sanctions adopted by the EU Council. The opinion of the advocate general is not binding for the Court.

UK

Coronavirus: House of Commons Releases Briefing Paper on Sanctions and the Humanitarian Crisis

On May 13, 2020, the House of Commons released a [briefing paper](#) on coronavirus in relation to sanctions and humanitarian issues. Humanitarian groups are claiming that sanctions are preventing certain countries from being able to obtain adequate medical supplies they need in order to fight the pandemic. In addition, the UN has called for sanctions to be eased. Since the Trump Administration abandoned the nuclear agreement with Iran in 2018, sanctions have been re-imposed. Critics say that this has prevented Iran from responding to the pandemic as payment channels for the import of supplies were blocked, including the Iranian central bank. The US has since made exemptions, including working with the central bank to enable transactions that involve humanitarian supplies. The EU has also since set up INSTEX, which is a means of transaction that is intended to allow European firms to trade with Iran, despite US sanctions.

Office of Financial Sanctions Implementation (OFSI) Releases Its Quarterly Report to Parliament

Under the Terrorist Asset-Freezing etc. Act 2010 (TAF 2010), the Treasury is required to report to Parliament on its operation of the UK's asset freezing regime, which is mandated by UN Security Council Resolution 1373. On May 19, OFSI released its most recent quarterly report on its operations between October 1, 2019 and December 31, 2019. The full report can be accessed [here](#).

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Contacts

Please feel free to contact one of the trade practitioners listed or you can reach our team collectively at InternationalTradeCompliance@squirepb.com.

US

George N. Grammas

Partner, Washington DC/London
T +1 202 626 6234
T +44 20 7655 1301
E george.grammas@squirepb.com

Daniel E. Waltz

Partner, Washington DC
T +1 202 457 5651
E daniel.waltz@squirepb.com

Karen R. Harbaugh

Partner, Washington DC
T +1 202 457 6485
E karen.harbaugh@squirepb.com

EU

Robert MacLean

Partner, Brussels
T +32 2 627 7619
E robert.maclean@squirepb.com

José María Viñals

Partner, Madrid/Brussels
T +34 91 426 4840
T +32 2 627 1111
E josemaria.vinals@squirepb.com

Wojciech Maciejewski

Associate, Brussels
T +32 2 627 7612
E wojciech.maciejewski@squirepb.com

UK

Matthew Kirk

International Affairs Advisor, London
T +44 20 7655 1389
E matthew.kirk@squirepb.com

International Trade Practice co-leaders: Frank Samolis (partner, Washington DC) and George Grammas

About Us

Our export controls and sanctions lawyers have the ability to provide advice on the shifting regulatory framework on both sides of the Atlantic. We have extensive experience in advising and representing a wide range of companies and financial institutions in Europe, the US and other jurisdictions on export control and sanctions from a multijurisdictional perspective. Our team is part of our overall International Trade Practice, providing a “one-stop shop” solution to global trade compliance through rapid, professional and tailored advice and compliance tools to fit your business needs and processes.

ITAR Handbook

Organizations engaged in the trade of items specially designed for military or space applications are encouraged to download our complimentary *ITAR Practitioner’s Handbook*, which covers the International Traffic in Arms Regulations (ITAR) and the US Department of Commerce “600 Series.”

COVID-19 Resources

Please visit [our COVID-19 Coronavirus Legal Insights hub](#) for extensive and comprehensive legal, business and regulatory advice, complemented by our unique global political insight, as well as practice support tools to help you navigate the unfolding pandemic, while helping you stay abreast of the changes to laws, regulations and compliance requirements around the globe.