

## CLIENT ALERT

### Export Compliance and List Administration

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Confirmation came this week that BIS is moving ahead with its expanded Entities List proposal which means that exporters will continue to face increasingly difficult list management issues. The proposed rule would allow BIS to identify entities that it reasonably believes pose a risk of being involved in activities that are contrary to the national security or foreign policy interests of the U.S. effectively expanding the criteria used to restrict exports to foreign entities. This effort reflects the ongoing expansion of list-based controls employed by export agencies. Managing the impact of these lists goes well beyond order processing to the full range of international business, including joint research, outsourcing, joint ventures, and many other collaborative efforts driven by globalization.

For assistance with list-based export control compliance, please contact Jeff Snyder at [jsnyder@crowell.com](mailto:jsnyder@crowell.com) in our Washington, D.C. office.

#### Events

- Crowell & Moring hosts the latest in its Globalization programs in California on October 4. For more information and to sign up, follow this link: <http://www.crowell.com/events/global/>
- Jeff Snyder will lead panel discussions on ethics and export controls training at programs in Los Angeles on October 24, in New York on October 30, and Miami on November 14. To view the program brochure and for further information, please go to <http://www.crowell.com/NewsEvents/Event.aspx?id=284>.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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