

CHECKLISTS OF FOREIGN COUNTRIES SUBJECT TO SANCTIONS

© June 2022

 @TCTradeReg



TABLE OF CONTENTS



COUNTRIES SUBJECT TO VARIOUS RESTRICTIONS BY THE U.S., EU, AND UN	2
U.S. Checklist: Trade and Other Restrictions Affecting Foreign Countries	3
U.S. CHECKLIST - FURTHER INFORMATION	4
EU & UK Checklist: Trade and Other Restrictions Affecting Foreign Countries	9
EU & UK CHECKLIST - FURTHER INFORMATION	10
UN Checklist - Security Council Mandated Sanctions	13
THOMPSON COBURN LLP INTERNATIONAL TRADE TEAM	16

COUNTRIES SUBJECT TO VARIOUS RESTRICTIONS BY THE U.S., EU, UK, AND UN

The following are checklists of countries that are subject to a variety of U.S., UK, and EU-imposed restrictions affecting international trade. The countries are grouped into different categories based upon their nature; several of the countries are subject to more than one category of restriction. Although there is some overlap between the U.S. and EU and more overlap between EU and UK restrictions, the restrictions applicable to a

particular country may differ significantly. Explanatory notes following the two checklists describe the different categories of restrictions for each.

The last page describes sanctions mandated by UN Security Council resolutions and also sets forth information regarding sanctions implemented by certain other countries.

Please note: *The attached checklists are intended to alert users to possible issues involving transactions with the named countries or designated persons. They are not intended to constitute, or substitute for, legal advice. Because sanctions programs are subject to change, it is important to review, in advance, any planned dealings with sanctioned countries or persons.*

U.S. CHECKLIST: TRADE AND OTHER RESTRICTIONS AFFECTING FOREIGN COUNTRIES

Please note: This list is intended to alert users to possible issues involving transactions with the named countries (or regions i.e., Crimea). It is not intended to constitute, or substitute for, legal advice.

Country / Region	Afghanistan	Balkans (Western) (relating to former Yugoslavia)	Belarus	Burma (Myanmar) ^a	Cambodia	Central African Republic	China (PRC) ^c	Cuba	Cyprus	Democratic Republic of the Congo	Eritrea	Ethiopia	Haiti	Iran ^d	Iraq	Kuwait	Lebanon	Libya	Mali	Nicaragua	North Korea	Qatar	Russia ^b	Saudi Arabia	Somalia	South Sudan	Sudan ^e	Syria	Ukraine ^b	Sanctioned Regions of Ukraine - Luhansk, Donetsk, Crimea ^b	United Arab Emirates	Venezuela ^f	Yemen	Zimbabwe	
Comprehensive Economic and Trade Sanctions ¹								x						x						x								x		x					
Limited Country Sanctions ²	x		x	x			x															x										x			
Sectoral Sanctions ³			x	x			x															x										x			
Debt & Equity Sanctions or Targeted Investment Restrictions ⁴			x																			x										x			
Specially Designated Nationals (Individuals and Organizations) ⁵		x	x	x		x	x	x		x		x		x	x		x	x	x	x	x		x		x	x		x	x	x		x	x	x	
Restricted Trade in Defense Articles/Weapons (ITAR) ⁶	x		x	x	x	x	x		x	x	x	x	x	x	x		x	x		x	x	x		x	x	x	x		x		x		x		x
Military End Users/Use Restrictions (EAR) ⁷			x		x		x	x						x							x								x			x			
Anti-Boycott Concerns ⁸															x	x	x	x				x		x			x						x		

U.S. Checklist endnotes and category summaries on pages 4-8.

U.S. CHECKLIST – FURTHER INFORMATION



Summary of U.S. Restriction Categories:

^{1/} **Comprehensive Economic and Trade Sanctions:** These countries (or regions) are subject to far-reaching economic sanctions implemented by the Department of the Treasury's Office of Foreign Assets Control ("OFAC"). The restrictions potentially prohibit nearly all dealings by U.S. persons in property of the listed countries, including limitations on imports, exports and financial transactions.

These countries are also subject to broad trade restrictions on the provision of U.S. goods or services, including by non-U.S. persons. These restrictions are not limited to strategic, dual-use or defense items but generally extend to nearly all goods and services. Further information can be found at <http://www.treasury.gov/resource-center/sanctions>

^{2/} **Limited Country Sanctions:** These are countries that, while not comprehensively sanctioned, are subject to sanctions targeting the regime in power or certain elements thereof and which involve restrictions in addition to SDN list entries. Although Zimbabwe and Nicaragua are not included because sanctions are limited to SDN designations, these countries pose an elevated sanctions risk because significant government actors or those who support them are sanctions targets and their property interests may include commercially significant government and civil entities or projects.

^{3/} **Sectoral Sanctions:** This refers to sanctions that are not comprehensive but target certain economic sectors of countries subject to regime-focused sanctions. These may include restrictions against dealing in certain debt or equity of sanctions targets, target specific activity in an economic sector (such as oil production), or threaten sanctions on persons for operating in particular economic sectors in a country.

^{4/} **Debt & Equity Restrictions:** Beginning with Russia in 2014, the U.S. began imposing sanctions on debt or equity issued by sanctions targets. Although these have been aimed at government-owned entities in certain sectors, and a type of sectoral sanction, they have also targeted some or all sovereign debt, and investments in certain companies (Chinese Military)

^{5/} **Specially Designated Nationals (Individuals and Organizations):** U.S. persons are restricted in their ability to engage in transactions with specially designated nationals, or SDNs (a group that includes specified individual, entities, and vessels), wherever they may be located. The countries listed are those countries in which SDNs are specifically referenced. In addition to persons linked to these countries, the SDN list also includes individuals, entities and vessels, wherever located, that are regarded as terrorists, narcotics



traffickers or proliferators of weapons of mass destruction or as contributing to these activities. An up-to-date list of SDNs is maintained by the Department of the Treasury's Office of Foreign Assets Control. See <http://www.treasury.gov/resource-center/sanctions>.

^{6/} **Restricted Trade in Defense Articles/Weapons:** The Department of State's Directorate of Defense Trade Controls ("DDTC") maintains a list of countries for which it has adopted specific policies—generally highly restrictive—relating to the export of defense articles and defense services. See https://www.pmddtc.state.gov/ddtc_public?id=ddtc_public_portal_country_landing&spa=1&table=x_usd10_ddtc_public_ddtc_public_country_policies&filter=&p=4&o=country&d=asc. These countries are also indicated as country group D:5 in The Export Administration Regulations ("EAR"), See 15 U.S.C. Part 740 Supp. 1; and are subject to restrictions with regard to the exportation of 600 series items.

Though there are no current embargoes on the Kyrgyz Republic and the Republic of Guinea, DDTC has issued a "Notice to Exporters" for each country stating that license applications for the export of U.S. Munitions List ("USML") items to these countries may be delayed and approval should not be assumed.

Additionally, DDTC issued a "Notice to Exporters" regarding the issuance of export licenses for major defense equipment (defined in 22 U.S.C. 2794(6)) to be exported to Pakistan. Currently, the issuance of licenses is prohibited absent an appropriate certification or waiver under Section 203 of the Enhanced Partnership with Pakistan Act of 2009 (Public Law 111-73) in fiscal years 2012-14.

^{7/} **Military End Use/End User Rules under the EAR**

For companies exporting goods to Cambodia, Burma, Russia, or Venezuela, an important change took place with respect to products with military end uses or users on June 29, 2020. Military end use included direct uses, such as parts or components of weapons, as well as indirect uses, like those for maintenance or repair. After the June 29 changes, the definition of military end use was expanded to include "any item that supports or contributes to the operation, installation, maintenance, repair, overhaul, refurbishing, 'development' or 'production' of military items." The new definition could now capture any item tangentially related to military uses.

^{8/} **Anti-Boycott Concerns:** U.S. persons are subject to civil and criminal penalties, or in some cases to the denial of tax advantages, if they participate in foreign boycotts that the U.S. does not support. The foreign economic boycott that is of principal concern to U.S. companies is the Arab League boycott of Israel. The Department of the Treasury (Office of the International Tax Counsel/Tax Policy) publishes a quarterly list of "boycotting" countries, on which the named countries are found.



U.S. Checklist Notes:

^{a/} **Burma (Myanmar).** After a period of sanctions easing, the U.S. has imposed new sanctions on Burma by issuing EO 14014 (February 10, 2021), following a military coup and violence against protesters in the country. The EO blocks all property in the possession of U.S. persons that belongs to designated persons operating in the Burmese defense sector, responsible for the coup or unrest in Burma, who are members of the Burmese government or security forces, or other persons materially assisting the foregoing. These individuals must be explicitly designated (i.e., listed by OFAC) in order to become blocked. The Department of Commerce has also tightened export controls pertaining to Burma, moving it to Country Group D:1 as of March 8, 2021. New investment with the Burmese Ministry of Defense and other armed groups, activities with certain sanctioned parties and importation of jadeite or rubies mined or extracted from Burma also remains prohibited. An interim final rule published on April 8, 2021 added Burma to the list of countries with military-intelligence-related controls. An exporter, reexporter, or transferor requires a license if there is knowledge the item is destined for a military-intelligence end use or user in Burma.

^{b/} **Russia/Crimea.** Since the issuance of Executive Order 13660 (March 6, 2014), Executive Order 13661 (March 17, 2014), and Executive Order 13662 (March 24, 2014), the U.S. has gradually extended sanctions against Russia because of its annexation of Crimea. The expanded sanctions include the designations of SDNs in both Russia and Ukraine, targeted export restrictions against the Russian defense, and energy industries, the targeting of government-controlled entities in its defense, banking, and energy sectors with prohibitions on new debt and equity. Separate sanction prohibit the provision of goods, technology, and non-financial services for deepwater, Arctic offshore, or shale projects in any location where a listed entity has a 33% or greater ownership interest. Executive Order 13685 (December 19, 2014) implements broad-based sanctions against the Crimea region of Ukraine. While we recognize that Crimea is not a country, it is included on this chart because of the nature of the sanctions that have been imposed. Congress's passage of the Countering America's Adversaries Through Sanctions Act (CAATSA) on August 2, 2017 (PL No. 115-44), codified some earlier sanctions on sectors of the Russian economy and defense industries, and imposed additional economic measures on Russia, Iran, and North Korea. On March 2, 2021, the Department of State added Russia to the "Section 126.1" list, changing the license policy for most ITAR articles and services to a "presumption of denial". Exports, reexports, or transfers of goods subject to the EAR involving Russian military end uses or end users are also subject to additional restrictions. Although Russia is not subject to comprehensive sanctions, CAATSA demonstrated strong congressional intent to punish Russia for election interference and keep many economic measures in place that affect the Russian economy. At the time of this revision heavy sanctions were being imposed on Russia and geographic sanctions had just been imposed on the so-called People's Republics of Donetsk and Luhansk in Ukraine. Future revisions will provide additional detail.

^{d/} **Iran.** On May 8, 2018, President Trump announced his decision to withdraw from the The Joint Comprehensive Plan of Action ("JCPOA") and to reimpose U.S. nuclear-related sanctions lifted in 2016 to implement the accord. Following two consecutive 90-day wind-down periods (ending August 6, and November 4, 2018, respectively),



the full reimposition of U.S. pre-JCPOA sanctions on Iran occurred. Sanctions apply to certain transactions by foreign subsidiaries owned or controlled by a U.S. person. Public companies must disclose certain Iran-related activities in their annual and quarterly reports filed after February 6, 2013. The U.S. may sanction any person determined by OFAC to have assisted or supported certain entities of or activities by the Government of Iran, regardless of any involvement by U.S. persons (“secondary sanctions”). Congress’s passage of the Countering America’s Adversaries Through Sanctions Act (CAATSA) on August 2, 2017 (PL No. 115-44), imposed additional economic measures on Russia, Iran, and North Korea. The Biden Administration has prioritized the re-engagement of all parties in the JCPOA framework, but no changes to U.S. sanctions reimposed by the Trump Administration have taken place as of the date of this publication.

^{e/} **Sudan.** Sanctions against Sudan were revoked pursuant to Executive Order (EO) 13761, as amended by EO 13804. These actions authorized transactions with individuals and entities in Sudan and solidified the unblocked property involving the Government of Sudan. OFAC published new Frequently Asked Questions regarding this revocation, as well as a new General License authorizing certain transactions pursuant to the Trade Sanctions Reform and Export Enhancement Act of 2000. This action does not affect OFAC sanctions related to the conflict in Darfur, which were imposed pursuant to EO 13400 pursuant to the national emergency declared in EO 13067. The controls that applied to Sudan until October 12, 2017, did not apply to the Republic of South Sudan. 76 Fed. Reg. 41046 (July 13, 2011). On June 28, 2018, OFAC announced the removal of the Sudanese Sanctions Regulations. Sudan was removed from the list of State Sponsors of Terrorism on December 14, 2020.

^{f/} **Venezuela.** On August 6, 2019, the Trump Administration issued a new Executive Order blocking property of the Government of Venezuela for U.S. persons. The new prohibition is a steep escalation of consequences on the Maduro regime’s government, preventing U.S. companies and individuals from doing business with any government of Venezuela entity, official, or any entity owned by or controlled the government. Exports, reexports, or transfers of goods subject to the EAR involving Venezuelan military end uses or end users are also subject to additional restrictions.



Non-Country Based Lists to Check:

The Department of Commerce's Bureau of Industry and Security ("BIS") maintains links to several other lists, compiled by various U.S. government agencies, that can be checked prior to engaging in exports or re-exports. See <http://www.bis.doc.gov/complianceandenforcement/liststocheck.htm>

Among these are the following, all of which are compiled by the Department of Commerce and apply to specific individuals or entities:

- (1) The **Denied Persons List**, which includes individuals and entities that have been denied export privileges;
- (2) The **Unverified List**, which includes parties for which BIS has been unable to verify the end-user in prior transactions;
- (3) The **Entity List**, which includes parties whose presence in a transaction can trigger a license requirement under the Export Administration Regulations; and
- (4) The **Consolidated Screening List**, which combines export screening information from the Departments of Commerce, State, and Treasury.

Please note: This information is intended to alert users to possible issues involving transactions with the named countries. It is not intended to constitute, or substitute for, legal advice.

Trade with China

Growing Tension between the U.S. and China

Tensions between the U.S. and China have grown over recent years, with China becoming a top national security priority. The U.S. has tightened export control restrictions involving China and Chinese entities and imposed blocking sanctions on several Chinese entities and persons; responded swiftly to what it views as the Chinese government's erosion of Hong Kong's autonomy after the passage of China's 2020 National Security Law; and taken a number of steps to respond to human rights abuses occurring in certain portions of China, particularly affecting commerce involving the Xinjiang Autonomous Region. These actions, taken together, have significant ramifications for U.S. companies doing business in China or with Chinese entities. In addition, the U.S. has broad restrictions on exports to the Chinese military, and implement investment restrictions on designated Communist Chinese Military Companies.

In addition, the rule was expanded to include military end users not limited to China, in addition to military end uses. The definition of "military end user" encompasses not only the military and government organizations supporting the military, but also "any person or entity whose actions or functions are intended to support 'military end uses.'" [15 C.F.R. § 744.21\(g\)](#). On top of these revisions, BIS changed the license review policy to a "presumption of denial" for most transactions involving military end use/end users in affected countries, making it more difficult to obtain a license if needed. [15 C.F.R. § 744.21\(e\)](#).

EU & UK CHECKLIST: TRADE AND OTHER RESTRICTIONS AFFECTING FOREIGN COUNTRIES

Please note: This list is intended to alert users to possible issues involving transactions with the named countries. It is not intended to constitute, or substitute for, legal advice.

	Country																														
	Afghanistan	Belarus	Bosnia and Herzegovina	Burma (Myanmar)	Burundi	Central African Republic	Crimea	Democratic Republic of the Congo	Egypt	Eritrea	Guinea (Republic of Guinea-Conakry)	Guinea-Bissau	Iran	Iraq	Lebanon	Libya	Mali	Nicaragua	North Korea	People's Republic of China (PRC)	Russia	Somalia	South Sudan	Sudan	Syria	Tunisia	Turkey	Ukraine	Venezuela	Yemen	Zimbabwe
Broad Sanctions ¹		x					x												x						x						
Trade/Investment Restrictions ²	x	x		x		x	x			x	x		x	x	x	x			x		x	x	x		x			x	x		x
Debt and Equity Sanctions																					x										
Asset Freeze/Travel Restrictions ³	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Arms & Related Materiel Embargo ⁴	x	x		x		x	x	x		x		x	x	x	x	x			x	x	x	x	x	x	x				x		x

EU & UK Checklist endnotes and category summaries on pages 10-12.

EU & UK CHECKLIST – FURTHER INFORMATION



Summary of Categories:

^{1/} **Broad Sanctions:** This category generally does not encompass the same kind of comprehensive sanctions programs typically imposed by the U.S., which prohibit nearly all activities involving the sanctioned country. Inclusion of a country here does indicate, however, that the EU or UK has imposed a variety of restrictions on trade (including, but extending beyond, an arms embargo), and certain financial services and or (re)insurance coverage, dealings with certain named individuals or entities, and, sometimes, diplomatic sanctions.

^{2/} **Trade/Investment Restrictions:** This category may encompass restrictions on exports of certain types of services or technology, investment in particular sectors and imports of certain items. These restrictions may be quite limited. Refer to the applicable EU or UK guidance.

[B]Debt & Equity Restrictions:[B] The EU imposed sanctions targeting debt and equity of Russian financial, energy and defense sectors in 2014 and the UK has continued those. The UK imposed sanctions on Dealing with transferable security/money-market instruments of any Belarusian authority or majority-owned credit or financial institution with maturity greater than 90 days or making a loan with more than a 90-day maturity to the same.

^{3/} **Asset Freeze/Travel Restrictions:** The EU and UK typically imposes a freeze of assets or restrictions on travel (admission) to the EU or UK only with respect to specified individuals or entities (and entities they own or control) rather than broader country sanctions.

^{4/} **Arms and Related Materiel Embargo:** The EU often imposes restrictions in this category in accordance with U.N. Security Council Resolutions, as is the case with respect to Sudan.

Resource for EU Restrictions: https://eeas.europa.eu/archives/docs/cfsp/sanctions/docs/measures_en.pdf.



Note regarding Germany:

Germany makes available extensive materials on its export control regime. (See web site reference below.) In addition to observing the EU-wide restrictions, it establishes special license requirements for export items that (1) are intended for conventional military end use and (2) are to be sent to a “Country List K” destination. The Country List K currently consists of Cuba and Syria.

Germany also requires specific authorization if (1) the export items are intended for use in a nuclear plant and (2) a purchasing country or destination is one of the following:

Algeria	Iran	Israel	Libya	Pakistan
India	Iraq	Jordan	North Korea	Syria

Resource for German Restrictions:

<https://cutt.ly/8r0lo2A>.

Note regarding Canada:

Canada typically imposes sanctions mandated by UN Security Council resolutions. In addition, although it is not an EU member, Canada often follows the EU in adopting non-UN based sanctions, such as those imposed on Belarus or Zimbabwe. It has not, however, followed the EU in adopting sanctions against Moldova.

Resource for Canadian restrictions:

<https://cutt.ly/br0lhzO>.

Russia/Ukraine: Canada has adopted sanctions against Russia that closely mirror those adopted by the U.S. and the EU.

Please note: This information is intended to alert users to possible issues involving transactions with the named countries. It is not intended to constitute, or substitute for, legal advice.



UK and "Brexit" from EU Sanctions

Following the end of the transition period for the UK's exit from the EU, as of January 1, 2021, the UK no longer implements EU sanctions as a matter of course. New UK sanctions regulations in force under the Sanctions and Anti-Money Laundering Act of 2018 establish autonomous UK sanctions regimes, applying to the entire UK. While similar to the previous EU sanctions structure, the new UK regime does not overlap perfectly with the EU's sanctions programs. The UK has defined sanctions program groups for 9 thematic categories (e.g., chemical weapons, terrorism, cyber activity, financial misappropriation, human rights, etc.) and 29 programs based on geographic territories.

The UK also maintains arms embargo, export controls, and other trade restrictions programs. For example, it requires specific authorization for the export of certain dual-use and military end-use items. The Export Control Joint Unit (UCJU) administers the UK's export control and licensing system.

Resources for UK Restrictions: <https://tinyurl.com/3h7k3cny>; <https://tinyurl.com/2phmd3rh>

UN CHECKLIST – SECURITY COUNCIL MANDATED SANCTIONS

The UN Security Council can impose mandatory non-military sanctions under Chapter VII of the UN Charter in furtherance of its mission to maintain or restore international peace and security. While the substance of the relevant Security Council resolutions varies, all of the following countries and groups, except Lebanon, are currently subject to at least some restrictions on the supply of arms and related material; additional restrictions, including travel restrictions and asset freezes applicable to named individuals, may also apply.

Central African Republic
Congo (Democratic Republic of the Congo)
Guinea-Bissau
Iraq
Lebanon*
Libya
Mali
North Korea
Somalia
South Sudan
Sudan
Yemen
Terrorists (includes ISIL, Al-Qaeda and the Taliban)

*/Restrictions on individuals involved in the killing of former Prime Minister Rafiq Hariri.

Resource for UN sanctions: www.un.org/sc/committees

Asian Countries: Our research has found little information on country-based export control regimes currently available online, at least in English, from official Chinese or Japanese sources. By contrast, Hong Kong, a special administrative region of China, maintains an easily accessed list of restrictions it enforces against countries that are subject to UN sanctions. Hong Kong's list mirrors the UN checklist set forth above.

Resource for Hong Kong restrictions: <https://cutt.ly/Mr0lzEd>.

Singapore also publishes helpful information online. It sets forth the specific restrictions on various countries and persons it implements in accordance with UN sanctions. Singapore also supplies links to information on U.S., EU and Japanese restrictions under the title, "Unilateral Sanctioned Lists or Embargoes."



Resource for Singapore restrictions and links: <https://cutt.ly/Or0ljLk>.

South Africa: Although most of South Africa's official online governmental materials appear to be published in English, we have not found any specific discussion of economic sanctions. As a long-standing UN member, however, South Africa presumably implements mandatory economic sanctions adopted by the UN Security Council. It should be noted that Zimbabwe—which is not currently subject

to UN sanctions—raises special issues for South Africa, a neighboring country that has received numerous refugees from Zimbabwe. South Africa's current President, Jacob Zuma, has called for the lifting of sanctions imposed against Zimbabwe. The U.S., EU and Canada are among those imposing the sanctions.

A considerable amount of trade-related information (although not currently covering economic sanctions or similar trade restrictions) can be found at the web site

of the International Trade Administration Commission of South Africa: www.itac.org.za.

Australia: <https://www.dfat.gov.au/search?keys=sanctions>

Please note: This information is intended to alert users to possible issues involving transactions with the named countries. It is not intended to constitute, or substitute for, legal advice.





INTERNATIONAL TRADE TEAM



ROBERT SHAPIRO
CHAIR
202 585 6926
rshapiro@thompsoncoburn.com

Robert advises clients on compliance with the international trade regulations under the ITAR, the EAR, U.S. economic sanctions programs, customs law, anti-corruption laws, and the review of foreign investment in the United States. Robert regularly represents clients before OFAC, BIS, CBP, DDTTC, CFIUS and other administrative, legislative, and judicial agencies. Robert is the Chair of the International Trade practice area.



JONATHAN BENNER
PARTNER
202 585 6985
jbenner@thompsoncoburn.com

Jonathan's practice focuses on international and domestic maritime and shipping matters, including trade sanctions and other regulations affecting the global movement of goods and commodities. Much of his work in the international trade area has arisen from marine insurance issues. Jon is an experienced litigator at all levels of the federal court system.

INTERNATIONAL TRADE TEAM



SEAN MCGOWAN
PARTNER
202 585 6976
smcgowan@thompsoncoburn.com

Sean counsels clients on federal regulatory compliance issues affecting aviation, rail, trucking, maritime, hazmats and the export of controlled products and technology. He practices before various regulatory agencies, including the DOT, FAA, and the STB, and advises on matters involving the EAR, the ITAR and sanctions programs under the OFAC. He is co-chair of the firm's UAS (Drone) Practice Group.



JIM SLEAR
Partner
202 585 6981
jslear@thompsoncoburn.com

Jim advises domestic, foreign and multinational clients in an array of industries, including aerospace, biomedicine, financial services, manufacturing and telecommunications with regard to international trade compliance and enforcement matters arising under international sanctions, the ITAR, the EAR, the FCPA and the Committee on Foreign Investment in the U.S. process.



INTERNATIONAL TRADE TEAM



TYLER BLACK
ASSOCIATE
202 585 6932
tblack@thompsoncoburn.com

Tyler is an experienced international trade and regulatory attorney who analyzes federal law and regulations, providing comprehensive guidance to clients in a variety of sectors, including international trade, aviation, unmanned aircraft systems, manufacturing, financial services, and insurance. In his work on international trade, including importation, sanctions, and export control issues, Tyler analyzes, manages, and provides guidance for clients' ongoing multi-agency compliance responsibilities, freeing company executives to focus on their day-to-day business.



EVELYN CLARK
ASSOCIATE
202 585 6943
eclark@thompsoncoburn.com

Evelyn advocates for clients in litigation and administrative matters involving the federal government – including fraud investigations and administrative proceedings. She draws on her experience working with government agencies to guide clients through complex issues. Evelyn supports a number of trade matters through legal research, drafting pleadings and memoranda, supporting case management, conducting document reviews, and assisting with client communications.



ABOUT THE FIRM

Thompson Coburn LLP's International Trade attorneys counsel clients in the legal aspects of shipping goods, services and technologies across international borders. We regularly advise clients on customs compliance and export controls, foreign investment, international finance, immigration and the protection of intellectual property rights. Our attorneys regularly represent clients before the related agencies under the U.S. Department of Homeland Security, the U.S. Department of Commerce, the U.S. Department of the Treasury and the U.S. Department of State, as well as the U.S. International Trade Commission, the Office of the U.S. Trade Representative, the U.S. Congress and international bodies.

Since the firm's founding in 1929, we have represented clients from nearly every industrial and corporate sector, including energy, banking, transportation, manufacturing and communications. Now, with more than 400 attorneys and 50 practice areas, we continue to serve clients throughout the United States and abroad.

TOTAL COMMITMENT® TO OUR CLIENTS





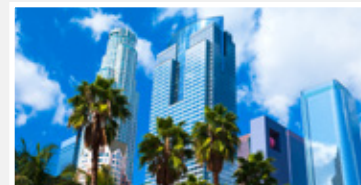
CHICAGO

55 East Monroe Street
37th Floor
Chicago, IL 60603
312 346 7500



DALLAS

2100 Ross Avenue
Suite 3200
Dallas, TX 75201
972 629 7100



LOS ANGELES

10100 Santa Monica Boulevard
Suite 500
Los Angeles, CA 90067
310 282 2500



NEW YORK

488 Madison Avenue
New York, NY 10022
212 478 7200



SOUTHERN ILLINOIS

525 West Main Street
Suite 300
Belleville, IL 62220
618 277 4700



ST. LOUIS

One US Bank Plaza
St. Louis, MO 63101
314 552 6000



WASHINGTON, D.C.

1909 K Street, N.W.
Suite 600
Washington, D.C. 20006
202 585 6900

The information provided herein is intended for general purposes only and is not intended to be legal advice. This document is not intended to be a compliance manual, nor is it intended to outline all of the requirements for an international trade compliance program. The distribution and release of this document does not establish an attorney-client

relationship between the reader and Thompson Coburn LLP. The statutes and regulations referred to herein are subject to revision and amendment. Interpretations of the agencies and the courts of the United States must also be consulted to fully understand trade compliance issues. We suggest that parties involved in international trade consult

with legal counsel regarding specific issues that may arise with their international transactions.

The ethical rules of some states require us to identify this as attorney advertising material. The choice of a lawyer is an important decision and should not be based solely upon advertisements.