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Services

Corporate and Transactions
Corporate, Securities and
Commercial Transactions
Mergers and Acquisitions
International
Customs and Import Compliance
Export Controls and Sanctions
India
International Sales and
Commercial Transactions
Qatar

Industries

Aerospace and Defense
Automotive
Higher Education
Manufacturing



Jeffrey G. Richardson

Principal

Jeffrey Richardson advises multinational clients in the information technology and defense sectors on matters including mergers and acquisitions, distribution agreements, joint ventures, and strategic corporate structuring.

Specifically, Jeffrey brings expertise in matching operational business execution requirements with functional business structures. He is frequently engaged in advising clients of export control compliance, as well as the impact of intellectual property matters within business structures. His breadth of experience is informed by a business management and litigation background.

Export Controls and Compliance

Jeffrey is a member of Miller Canfield's Export Control Practice Group, focusing on client matters arising under ITAR, OFAC, EAR, as well as other export control regulations. This process includes the implementation of export control compliance programs, license applications, controlled asset identification, in addition to seeking approval of TAAs, MLAs. Moreover, the Miller Canfield Export Controls Group performs due diligence on acquisition targets, drafts export control manuals and technology control plans, assists with voluntary disclosures of export control violations, as well as the employment of foreign nationals subject to export controls.

Mergers, Acquisitions, and Divestitures

Jeffrey conducts, negotiates, and consummates international acquisition and divestiture transactions throughout the world. He is known for representing clients on foreign company acquisitions of U.S. companies possessing controlled

Jeffrey G. Richardson

Education

Walsh College, M.S.F., cum laude

University of Minnesota, J.D., cum laude

Bowling Green State University, B.A., cum laude

Bar Admissions

Ohio

Michigan

Minnesota

Court Admissions

U.S. Court of International Trade

U.S. District Court

- Eastern District of Michigan

technologies, whereby aspects of the acquisition may require approval by (1) the Directorate of Defense Trade Controls (DDTC) under ITAR export controls, (2) the Bureau of Industry and Security (BIS) under EAR export controls, (3) the Defense Security Service (DSS) for U.S. target facilities with U.S. security clearance under the Foreign Ownership, Control or Influence (FOCI) provisions of NISPOM, and (4) the Committee on Foreign Investment in the United States (CFIUS) under U.S. foreign investment laws (Exon-Florio, FINSAs). Since joining Miller Canfield, Jeffrey has assisted with over 1 billion dollars of transactions needing such approvals. He is also known for his representation of venture capital and private equity funds in the acquisition and divestiture of portfolio companies possessing automotive, defense, aerospace, software, IT and other controlled technologies and/or having operations located abroad.

Customs and Trade Compliance

Jeffrey's experience in customs compliance includes assisting clients with filing Petitions for Relief, requesting the mitigation of penalties and return of seized items. Jeffrey has advised clients on preparing voluntary disclosures as to customs violations, and assisting these clients in implementing long-term successful customs compliance strategies. He has also assisted clients on other aspects of international trade, including analyzing the impact of U.S.-Antidumping laws and determining tariff classifications.

Representative Matters

Export Controls

Simulation Software used for Military and Police Training

Advised a simulation software developer as to the applicable U.S. export controls when implementing a military or police training environment that uses disabled firearms with simulation hardware to create a more effective training simulation.

Entrepreneur ITAR Broker Requirement for Investment

Advised a U.S. entrepreneur on the ITAR Broker requirements to finance the development and deployment of reconnaissance aircraft in the EU.

International Company Distributing Rare Earth Elements

Assisted a U.S.-company, with a Chinese affiliate, involved in the acquisition and distribution of rare-earth minerals to prepare an export control classification of their products and complete the Rare Earth Elements Survey.

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Multinational OEM Defense Article Transfer

Advised multinational OEM as to the Austrian/EU requirements for an engineering center involved with the intra-community transfer of defense articles classified under EU Directive 2009/43/EC.

Purchase of Company Producing 600 Series Items

Advised client as to the impact on the purchase of a U.S. business arising from defense articles transferring from the United States Munitions List (USML) to the Commerce Control List (CCL) 600 Series.

Aerospace Company Export Control Reform Compliance

Classified the export controlled components of an aerospace company for items transferring from the United States Munitions List (USML) to the new 600 Series of the Commerce Control List (CCL).

Aerospace Company International Supply Chain Management

Developed an export compliance strategy for an aerospace company with a multi-stage international manufacturing process for Gas Turbine engine components.

Tier 1 Auto Supplier Export Control Audit and Benchmark Report

Conducted export control audit and compiled export control benchmark report for a multinational Tier 1 automotive supplier.

Foreign Military Sales Release of Classified Material

Coordinated the release of classified material in support of foreign military sales.

Foreign-owned Subsidiary Directorate of Defense Trade Controls Registration and License Transfer

Conducted the transfer of the registration and licenses issued by the Directorate of Defense Trade Controls to a foreign-owned U.S. subsidiary for an acquisition.

DDTC Mitigation Plan for Chinese National

Negotiated and implemented a Mitigation Plan with the Directorate of Defense Trade Controls (DDTC) regarding the ability of a Senior Financial Officer to direct and control the business affairs of the DDTC Registrant. The affected Senior Financial Officer, a citizen of the People's Republic of China, was employed by the ultimate parent to the DDTC Registrant.

Multi-national Manufacturer Component Classification for Use on the International Space Station

Advised a multi-national manufacturer as to the item based restrictions for components manufactured for use on the International Space Station, considering the impact of both the Commerce Control List (CCL) and U.S. Munitions List (USML).

Multi-national Manufacturer EAR End-use Restriction Compliance

Advised a multi-national manufacturer on the end-user and end-use restrictions under the Export Administration Regulations (EAR) for technology and components used within ballistic missile systems.

Military Ground Vehicle Component Manufacturer Regarding ITAR Advice

Review Request for Proposal, including ITAR components, and prepared Response for first tier contractor to a U.S. military ground vehicle project.

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Premier Aerospace Component Supplier as to Export Control Reform Advice

Performed detailed specially designed analysis regarding military aircraft components classified under the EU Military List, and initially caught under ECCN 09A610 classifying Military Aircraft and Related Commodities.

Premier Powertrain Supplier as to Export Control Reform Advice

Performed detailed specially designed analysis supporting the release of Ground Vehicle components formerly classified under the ITAR, and initially caught under ECCN 0A606.x pursuant to export control reform.

Export Controls Compliance for an Encryption Hardware Company

Assisted a U.S. start-up specializing in end-to-end encryption hardware with implementing an export control compliance program as required by venture capital investor for funding round.

Encryption for Software Defined Network

Advised a multinational software manufacturer regarding an encryption classification and license exception ENC compliance for a proprietary software defined network product.

Sanctions

Multinational OEM Russian Sanction Advice

Advised multinational OEM as to the impact of the Ukraine-Russia Related Sanctions applicable to its affiliated Chinese joint-venture doing business in Russia.

Software Programmer Compliance with Iranian Transactions and Sanctions Regulations

Assisted a social networking company in assessing the available exemptions to hire software programmers under the Iranian Transactions and Sanctions Regulations.

Automotive-Based Company Compliance with Syria Sanctions Regulations

Assisted U.S. automotive-based company in unwinding its business in Syria, as required by economic sanctions against Syria administered by the U.S. Office of Foreign Assets Control.

Software Developer Advice on Impact of Using Software Programmers from Iran

Advised a U.S. software development company as to the impact of upon its Australian subsidiary when hiring Iranian national software programmers.

CFIUS

Chinese Foreign Purchaser CFIUS Review

Conducted the Committee for Foreign Investment in the United States (CFIUS) filing of a Joint Voluntary Notice for a Chinese client purchasing a U.S. Business, including U.S.-controlled assets and technology.

Foreign Purchaser CFIUS Review

Advised client as to a draft Joint Voluntary Notice filed with the Committee for Foreign Investment in the United States (CFIUS) regarding a British Virgin Island entity purchasing a U.S. Business with ITAR-controlled assets.

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Foreign Purchaser CFIUS Filing

Conducted the Committee for Foreign Investment in the United States (CFIUS) filing for a Swiss client purchasing a U.S. Business with ITAR-controlled assets.

Agency Preview Prior to CFIUS Filing

Preview with the Bureau of Industry and Security (BIS) regarding the potential acquisition of a U.S.-target which manufactures 600 Series items by a Chinese acquirer.

State-Owned Enterprise Purchaser CFIUS Filing

Conducted the Committee for Foreign Investment in the United States (CFIUS) filing of a Joint Voluntary Notice for the single largest overseas acquisition by a Chinese automotive supplier in history.

Chinese Foreign Purchaser CFIUS Filing

Conducted the Committee for Foreign Investment in the United States (CFIUS) filing of a Joint Voluntary Notice for a Chinese client purchasing a U.S. Business, including U.S.-controlled assets and technology.

Software and Technology

Software Manufacturer Export Controls for Big Data Product

Advised a U.S. start up with a new "big data" product as to the impact of export controls on software development strategies with a new Chinese affiliate.

Canadian Manufacturer Robot Technology U.S. Export Controls Classification

Assisted a Canadian technology company with a U.S. subsidiary to classify its robot technology under U.S. export controls, including robot components, software and technology, along with accompanying cameras, sensors and lasers.

Global Technology Company Reclassification for Interfaces Now Using Controlled Microprocessors

Assisted a global technology company with analyzing the export control classification impact of using more strictly controlled microprocessors in its new network interface product designed to provide parallel access to multiple bus channels.

Tier 1 Auto Supplier Export Analysis of Technical Data through its IT System

Assisted a Tier 1 auto supplier in analyzing the data routes and cloud infrastructure used by its Information Technology System, discussing the possible un-intended consequences of causing technical data exports from the United States based upon server location and data routing priorities.

Technology Company Encryption Software Classification for Sale of Company

Classified the proprietary export-controlled software of a technology company prior to the acquisition of the technology company, including the documentation and analysis of the software's encryption functionality and classification on the Commerce Control List (CCL).

Export Control Provisions Required in EULA

Drafted export control regulation provisions required for simulation software end-user license agreements (EULA).

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Destination Control Statement Restricting Simulation Software Transfers

Prepared destination control statement regarding end-user and end-use restrictions for vehicle simulation software.

Voluntary Self-Disclosure Encryption Software Transfers

Advised a technology company as to a voluntary self-disclosure with the Bureau of Industry and Security regarding exports of controlled encryption software.

Health Data Management Software License Agreement Preparation

Drafted health data management software and services agreement, detailing software support services, software functionality and the HIPAA Business Associate Agreement.

Data Aggregator Software Service Reseller Advice

Prepared Software License Agreement for a data aggregator of the National Highway Traffic Safety Administration (NHTSA) and the Center for Auto Safety (CAS) statistics.

Software Reseller License Advice

Prepared a license agreement between a software reseller and licensor permitting the resale of the licensor's software and providing for application, maintenance and support.

International Retailer E-commerce Terms and Conditions Drafting

Drafted the e-commerce terms and conditions for the U.S. website of a multinational European coffee brewer manufacturer.

Chinese Automotive Terms of Service and Privacy Policy Drafting

Drafted the terms of service and privacy policy for the U.S. affiliate of one of the largest automotive corporations within China.

Additional Matters

Multinational Manufacturer Compliance with U.S. Anti-dumping Laws

Assisted a multinational manufacturer in assessing the impact of U.S. Anti-dumping laws on potential purchases where the export price may be lower than the normal value in the country of export.

Manufacturing Parts Reseller Voluntary Self Disclosure with the Census Bureau

Assisted a manufacturing-parts reseller in filing a voluntary self-disclosure with the Census Bureau to report systemic violations as to their reporting within the Automated Export System (AES).

Termination of Defense Security Service Facility Security Clearance

Coordinated the termination of a facility security clearance with the Defense Security Service (DSS) pursuant to responsibilities under the National Industrial Security Program Operating Manual (NISPOM) prior to the facility transfer to a foreign purchaser.

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Honors

*D*Business Magazine, Top Lawyers, International Trade Law, 2021-present

State Bar of Michigan, Pro Bono Honor Roll, 2022; Arts, Communications, Entertainment, and Sports Section, 2009 Hensel Award Recipient for outstanding contributions to the arts by a Michigan attorney; 2012 Certificate of Recognition for work as State and Federal Legislation Committee Chair

Walsh College, Masters of Science in Finance, cum laude, Specialization: Corporate Finance

University of Minnesota, J.D., cum laude, Intellectual Property Moot Court, Minnesota Intellectual Property Law Association Scholarship Award

Bowling Green State University, B.A., cum laude

Professional Activities

American Bar Association, Entertainment and Sports Law Forum; Intellectual Property Section; International Law Section; Business Law Section

State Bar of Michigan, Arts, Communication, Entertainment, and Sports Section, Chairperson 2003-2004; Council 2009-2012; Chairperson Elect 2002-2003; Treasurer 2001-2002; Secretary 2000-2001; Chairperson Right of Publicity Legislation Committee; Testified regarding Right of Publicity statute SB 983 (2007); Testified regarding Right of Publicity statute HB 5964 (2010); Business Law Section, UCC Committee; International Law Section, International Trade Committee; Export Controls and Economic Sanctions Committee

Minnesota State Bar Association

Speeches

"Trade and Tariffs in the USMCA Region: What Manufacturers Need to Know," Michigan Manufacturers Association (MMA) Operations Conference 2026, Lansing, Michigan, April 23, 2026

"The Supreme Court, Trade Powers and Tariffs: What Manufacturers Need to Know," MMA Webinar, February 26, 2026

"Windsor-Essex CUSMA Compliance Workshop: Avoiding the U.S. Tariff Trap," Toronto Region Board of Trade, Oldcastle, Ontario, February 11, 2026

"Export Controls: ITAR & EAR Compliance," Van Andel Global Trade Center, Grand Rapids, Michigan, November 13, 2025

"Trade Tensions, Tariffs & USMCA," Automotive Insiders Podcast, Motor & Equipment Manufacturers Association (MEMA), September 11, 2025

Jeffrey G. Richardson

"Providing Legal Clarity: Insights from Miller Canfield," Adopting China Speed: Best Practices to Drive Competitiveness in North America, MEMA, June 24, 2025

"Export Controls: ITAR & EAR Compliance," Van Andel Global Trade Center, Grand Rapids, Michigan, November 14, 2024

"Deemed (Re-)Exports and EAR 734.18 & 734.20," The American Conference Institute's Practical Forum on Advanced EAR Compliance, Chicago, Illinois, September 26, 2024

"Export Controls: ITAR & EAR Compliance," Van Andel Global Trade Center, Grand Rapids, Michigan, November 9, 2023

"7 Most Common Mistakes - International Sale of Goods," Michigan World Trade Week, Grand Rapids, Michigan, May 3, 2023

"Cybersecurity and Legal Obligations," Co-Presented with Zhiguo Du, Detroit Chinese Business Association's Cyber Security Readiness Seminar, Troy, Michigan, July 21, 2022

"Foreign Compliance With U.S. Reexport Controls," World Export Control Review webinar, April 22, 2021

"Export Controls: ITAR & EAR Compliance," Van Andel Global Trade Center, Grand Rapids, Michigan, November 10, 2020

"What Do Trade Sanctions Have To Do With Reporting?", Automotive Industry Action Group (AIAG) Responsible Materials Industry Briefing, Southfield, Michigan, June 11, 2019

"Export Sanctions & Embargoes" at Grand Valley State University produced by the Van Andel Global Trade Center, Grand Rapids, Michigan, August 22, 2018

"ITAR and EAR with a Focus on Export Control Reform," Miller Canfield, April 17, 2018

"Maximizing EAR License Exceptions and ITAR Exemptions," The American Conference Institute's Annual Forum on US Export & Re-Export Compliance, Toronto, Canada, January 31, 2018

"Export Controls: ITAR & EAR Training" at Grand Valley State University produced by the Van Andel Global Trade Center, Grand Rapids, Michigan, November 9, 2017

"Cyber Protection, Technology, and Information" presentation at Detroit Startup Week, May 22, 2017

"Social Media Hijacking - Trends, Responses and Solutions" presentation to the State Bar of Michigan, Arts, Communications, Entertainment & Sports Section at the Wayne State University Law School, Detroit, Michigan, March 9, 2017

"ITAR & EAR with a Focus on Export Control Reform" Schoolcraft PTACs given at Schoolcraft College, Livonia, Michigan, March 1, 2017

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"US Government Contracting: FAR and DFAR Training," Macomb PTAC, October 21, 2016

"Export Controls and Encryption," Macomb-OU INCubator at Velocity Collaboration Center, March 10, 2016

"The Directorate of Defense Trade Controls (DDTC) Proposal: Significant International Traffic In Arms Regulations (ITAR) Amendment," The Knowledge Group, March 1, 2016

"U.S. Export Controls Affecting Green Technology," Miller Canfield Cappuccino with Counsel Series, May 20, 2015

"ITAR and EAR With a Focus on Export Control Reform," PTAC of Schoolcraft College (Webinar), February 12, 2015

"Impacts of Export Control Reform on Specialized Manufacturing," ABA Export Controls and Economic Sanctions Committee, Broadcast Live from Troy, Michigan, December 16, 2014

"Exports, Encryption and the Cloud" (Webinar), The Knowledge Group, December 8, 2014

"ITAR and EAR With a Focus on Export Control Reform," PTAC of Schoolcraft College, Troy, Michigan, November 19, 2014

"CFIUS & FINSA Hot Topics in 2014" (webinar), The Knowledge Group, July 8, 2014

"ITAR and EAR With a Focus on Export Control Reform," PTAC of Schoolcraft College, Troy, Michigan, February 12, 2014

"An Overview of ITAR and EAR, with a focus on Export Control Reform," PTAC of Schoolcraft College, Traverse City, Michigan, December 4, 2013

"An Overview of ITAR and EAR, with a focus on Export Control Reform," PTAC of Schoolcraft College, Saginaw, Michigan, December 3, 2013

"Export Control Reform + ITAR + EAR = Major Changes for Your Businesses," Miller Canfield, November 6, 2013

"Successful Strategies for a Changing Marketplace," Michigan Aerospace Manufacturers Association, October 29, 2013

"An Overview of ITAR and EAR, with a focus on Export Control Reform," PTAC of Schoolcraft College, Livonia, Michigan, October 15, 2013

"Technology Disclosures to Non-U.S. Persons in the Workplace," Miller Canfield Cappuccino with Counsel Series, September 26, 2013

Sports and Entertainment Property Valuation and Financing, Moderator, 2011

Legal Aspects of Using Day-to-Day Technology, Moderator, 2010

Michigan's Film Credit: A Filmmaker's Toolbox, Moderator, 2009

Practical Law, Right of Publicity, 2007

Jeffrey G. Richardson

Publications

"Private equity optimism for Trump term fades to anxiety over tariffs," Crain's Grand Rapids Business, Quoted, September 5, 2025

"Sanctions in Europe," 2nd Edition, Poland Section, WorldECR, 2024

"Toward a Deeper Understanding, Next Levels in US Export Controls," Technology Controls Section, WorldECR, 2022

"US investment and export restrictions on Chinese military companies," co-authored with Zhiguo Du and Thomas Appleman, WorldECR, March 2021

"Structuring Contract Provisions for Risks Arising from Automated Driving Systems," October 2020, Michigan Bar Journal

"CFIUS Review Under FIRRMA - Jurisdiction Expands, While Open Investment Policy and National Security Focus Remain," Michigan International Lawyer, State Bar of Michigan, Spring 2020

"Sanctions in Europe," 1st Edition, Poland Section, WorldECR, 2020

"Information Filtration under the Export Administration Regulations," WorldECR, June 2017

"Impact of US Export Controls on the Sale of a Manufacturing Business," Michigan Manufacturers Association Magazine, January 2017

"Beware the real export compliance challenges of simulation software," WorldECR, May 2016

"Understanding the 4 Types of U.S. Export Controls," Michigan Manufacturers Association Magazine, October 2015

"A Modern Approach to Tackling CFIUS Concerns," The Michigan International Lawyer, Winter 2015 - also available in Chinese here.

"Know When Software Falls Under Export Control Regime," National Defense Magazine (NDIA), January 2015

WorldECR Desk Guidebook, Poland Chapter, 2015

"Export Controls in U.K. Offshore Centres," WorldECR, May 2014

"Are Your Software Transfers Compliant with U.S. Economic Sanctions?" WSJ Blog: Risk and Compliance Journal (Link), January 10, 2014

"It's Time for Ground Vehicle and Related Commodities Manufacturers to Embrace Export Control Reform," WorldECR, September 2013

"Use Caution When Traveling With Encryption Software," National Defense Magazine, August 2013

"Tax Treatment of Copyright-Protected Property: Not Everything is the Same Under the Sun," Michigan Business Law Journal Fall 2012

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"Unintended Endorsement Liability Under the FTC Guides," Michigan Bar Journal, August 2012

"Michigan Film Incentives: New Ownership and Control Requirements," Michigan Lawyers Weekly, October 11, 2010

"Michigan's Refundable Film Tax Credit Meets Article 9," Michigan Business Law Journal, Fall 2009

"Exporting Michigan Celebrities," Michigan Bar Journal, September 2007

"The Sounds of Silence," Michigan Bar Journal, June 2003

Articles

Old Tariffs, New Tariffs, Future Tariffs – Understanding the Landscape

White House Suspends BIS Affiliates Rule for One Year

BIS Expands Export Controls with New Affiliates Rule

UPDATED FinCEN's New Interim Final Rule (1) Exempts Domestic Companies from Corporate Transparency Act Reporting and (2) Sets New Deadlines for Reporting by Foreign Companies

DOJ Rule Restricting Sensitive Data Transfers Takes Effect

New U.S. Regulations on Vehicle Connectivity and Automated Driving Systems: Compliance Starts Now!

Michigan Federal Court Holds CTA Reporting Rule Unconstitutional, Enjoins Enforcement Against Named Plaintiffs

Treasury May Be Shifting CTA Reporting Rule Away from Domestic and Toward Foreign Reporting Companies

FinCEN Again Delays CTA Reporting Deadlines and Suspends Enforcement

Recent Developments: Nationwide CTA Injunction Lifted, New March 21, 2025, Reporting Deadline Set, and Reporting Rule May Be Modified

CTA Reporting Back On!

The Trade War Begins with Canada, China, and Mexico

Tariffs on Mexico, Canada Paused for 30 Days

Fifth Circuit Reinstates Texas Federal District Court's Nationwide Preliminary Injunction and Stay of the Corporate Transparency Act

Fifth Circuit Stays the Texas Federal District Court's Nationwide Preliminary Injunction and Stay of the Corporate Transparency Act, and FinCEN Publishes Extensions of Certain CTA Reporting Deadlines

Preparing for Tariff Increases – Mitigation Strategies

Texas Federal District Court Enjoins Enforcement of Corporate Transparency Act and Implementing Reporting Rule Nationwide

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Can the President Impose Tariffs Without Congressional Approval?

USTR Finalizes New Section 301 Tariffs

USTR Starts New Section 301 Tariffs: Be Prepared

USTR May Triple the Existing 301 Tariff Rate

Congressional Committee Requests Further Enforcement of the Uyghur Forced Labor Prevention Act

Section 301 Tariffs On China-Based Manufacturing: Here to Stay (For Now)

CBP Allocates Funding for Uyghur Forced Labor Prevention Act Enforcement

USTR Reinstates Certain Exclusions from Section 301 China Tariffs

U.S. Export Controls and Sanctions Update: Russia, Belarus and Ukraine

Biden Executive Order Strengthens and Expands U.S. Sanctions on Chinese Military Companies

Recent Developments on U.S. Ban on American Investment in Chinese Military Companies

U.S. Department of Commerce Publishes Military End User List for Restricting Exports to China and Russia

Structuring Contract Provisions for Risks Arising from Automated Driving Systems

Importers Seek Relief from Section 301 Tariffs on China-Based Manufacturing

CFIUS Review Authority Expands

U.S. and Foreign Business Affected by Addition of Huawei to the BIS Entity List

New Executive Order Will Impact Ability of U.S. Companies to Use Certain Technologies Deemed a Security Risk

The "Emerging and Foundational" Impact of the Export Control Reform Act

Busy Season for U.S. Sanction Programs

Status of Key U.S. Sanction Programs

Information Filtration under the Export Administration Regulations

Impact of US Export Controls in the Sale of a Manufacturing Business

The Real Export Compliance Challenges of Simulation Software

U.S.A 2015 Key Trends and Challenges in Export Controls and Sanctions

Business Opportunities in Iran for US Automotive Manufacturers through non-US Subsidiaries

Understanding the Four Types of U.S. Export Controls

Have You Agreed Not to Export Software? Yes!

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A Modern Approach to Tackling CFIUS Concerns

Is Your Software a Defense Article?

Export Controls in UK Offshore Centers

It's Time For Ground Vehicle and Related Commodities Manufacturers to Embrace Export Control Reform

Are Your Software Transfers Compliant with U.S. Economic Sanctions?

Use Caution When Traveling With Encryption Software