Annual Report to Congress

FISCAL YEAR 2025

U.S. Department of Commerce
Bureau of Industry and Security

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YEAR IN REVIEW

Under President Trump and Secretary Lutnick's Leadership, the Bureau of Industry and Security (BIS) is laser-focused on its mission to safeguard sensitive U.S. goods, software, and technology. BIS is fulfilling this mission today more effectively than ever.

BIS achievements in 2025 include:

- A major ramp-up in enforcement.
  - In calendar year 2025, BIS imposed penalties of approximately $324 million (civil and criminal). This is an 18-fold increase in the penalties collected in 2024, which were approximately $16 million.
  - BIS closed out landmark enforcement actions, such as a $95 million penalty on Cadence Design Systems for exporting Electronic Design Automation (EDA) software and hardware to Entity List parties.
- Expansion of export controls to cover technology of national security significance.
  - BIS restricted the export of the Nvidia H20 and equivalent chips, which the Biden Administration had allowed to be exported unlicensed and uncontrolled.
  - BIS added 142 entities to the Entity List, including companies that enable the development of high-performance computing capabilities and quantum technology, hypersonic weapons programs, and Iran's procurement of drones.
  - BIS closed a Biden-era loophole, which had allowed semiconductor manufacturing equipment and consumables to flow to Korean- and Taiwanese-owned fabs in China unlicensed. Now export licenses are required, and the capacity and technology level of the fabs are controlled.
- Ending the Biden Administration's practice of rubber-stamping export license applications.
  - The Biden Administration granted over 2100 licenses for companies on the Entity List. The majority of these were for SMIC and Huawei.
  - By contrast, in Q2 through Q4 2025, BIS granted only 16 new licenses to companies on the Entity List, and only for unique situations such as winding down operations in sanctioned countries.

- Concluding high-quality technology partnership agreements with the United Arab Emirates and Saudi Arabia – ensuring that these key military allies can invest in advanced U.S. semiconductors under strong security conditions.
- Eliminating wrongheaded regulations from the previous administration.
    - BIS repealed a rule on U.S. firearms exports, which had prohibited U.S. firearms exports to 36 countries – ceding overseas markets to foreign firearms manufacturers with no benefit to U.S. national security.
    - BIS announced the non-enforcement of and rescission plan regarding the AI Diffusion Rule, a sprawling, Biden-era regulatory disaster that would have suffocated the global AI industry and alienated American partners and allies.

The successes are continuing in 2026, including through a major ramp-up in Export Enforcement personnel, and several additional landmark enforcement actions, such as a $252 million penalty on Applied Materials (the second-largest stand-alone penalty ever imposed by BIS), for exporting semiconductor manufacturing equipment to an Entity List party; and the criminal case involving the indictment of three Super Micro executives – the largest semiconductor smuggling case ever, involving billions of dollars' worth of U.S. servers routed through intermediaries in Southeast Asia.

BIS has also fulfilled its mandate beyond export controls to an extent that is unprecedented. For example, BIS has launched more investigations under Section 232 of the Trade Expansion Act of 1962 (Section 232) than any prior administration, imposing tariffs on strategic sectors such as steel, aluminum, copper, timber and lumber, autos, trucks, pharmaceuticals, and semiconductors. This has led to hundreds of billions of dollars in new investment in these strategic sectors. In addition, under the mandate of Commerce's Information and Communications Technology Services (ICTS) Rule, BIS is implementing the Connected Vehicles Rule to keep foreign adversary technology off of American roadways, starting with model year 2027.

Below, each statutory factor for BIS's annual report (see section 4824(a) of ECRA) is stated and addressed.

The effect of controls imposed under this part on exports, reexports, and in-country transfers of items in addressing threats to the national security or foreign policy of the United States. Including a description of licensing processing times.

In FY25, U.S. export controls had a positive impact on the national security and foreign policy of the United States by ensuring that sensitive dual-use items, emerging technologies, and other controlled commodities were not diverted to parties of concern while also supporting legitimate commercial activity that reinforces U.S. technological leadership.

BIS also processed export licenses expeditiously. In calendar year 2025, BIS processed approximately 30,500 license applications. The average processing time for these licenses was 62 days – significantly less than the 90-day statutory benchmark, and approximately the same as in calendar year 2024 (60 days). This is despite the 43-day government shutdown in Q4 2025, which slowed the review of licenses at Commerce and partner agencies.

The impact of such controls on the scientific and technological leadership of the United States.

U.S. export controls had a positive impact on the scientific and technological leadership of the United States in FY25. BIS struck an effective balance between safeguarding sensitive U.S. goods, software, and technology and enabling their responsible, compliant use by allies and partners worldwide, which helps fuel the American innovation economy. For example, BIS played an important role in negotiating AI partnership deals with Saudi Arabia and the United Arab Emirates. These deals include commitments to ensure that exports of advanced semiconductors to these countries are consistent with U.S. national security while also advancing America's scientific and technological leadership.

The consistency with such controls of exports export controls imposed by other countries.

BIS worked throughout FY25 to secure foreign alignment with U.S. export controls. For example, BIS coordinated with the Office of the U.S. Trade Representative to secure commitments on alignment of export controls in Agreements on Reciprocal Trade with multiple countries. These agreements require foreign parties to align with U.S. controls and coordinate on export enforcement.

However, in certain areas, there remains a lack of alignment between U.S. controls and those of partners and allies. This is a particular concern with respect to semiconductor manufacturing equipment and components. Commerce and partner agencies are actively engaging with these countries to resolve disparities.

Efforts to provide exporters with compliance assistance, including specific actions to assist small and medium-sized businesses.

In FY25, BIS's Office of Exporter Services responded to 35,516 phone and email inquiries, an increase of 4,755 from FY24. In addition, individual licensing officers worked directly with companies to assist in the licensing process and help ensure effective compliance with the Export Administration Regulations.

A summary of ECRA-related regulatory changes from the prior fiscal year.

A list of ECRA-related regulatory changes from January 20, 2025 to September 30, 2025 is below.[1]

Publication Date	Title	Federal Register Citation
02/14/2025	Implementation of Additional Due Diligence Measures for Advanced Computing Integrated Circuits; Amendments and Clarifications; and Extension of Comment Period; Correction	90 FR 9604
03/28/2025	Additions to the Entity List	90 FR 14046
03/28/2025	Additions and Modifications to the Entity List	90 FR 14032
04/25/2025	Revisions to the Unverified List	90 FR 17339
05/13/2025	Department of Commerce Announces Rescission of Biden-Era Artificial Intelligence Diffusion Rule, Strengthens Chip-Related Export Controls	(press release)

[1] In addition, BIS published the following rules from October 1, 2024 to January 20, 2025: Implementation of Additional Due Diligence Measures for Advanced Computing Integrated Circuits; Amendments and Clarifications; and Extension of Comment Period (90 FR 5298); Additions to the Entity List (90 FR 4621); Addition of Entities to and Revision of Entry on the Entity List (90 FR 4617), Controls on Certain Laboratory Equipment and Related Technology To Address Dual Use Concerns About Biotechnology (90 FR 4612); Framework for Artificial Intelligence Diffusion (90 FR 4544); and Revisions to the Entity List (90 FR 559).

05/13/2025	Industry Guidance to Prevent Diversion of Advanced Computing Integrated Circuits	(guidance)
05/13/2025	BIS Policy Statement on Controls that May Apply to Advanced Computing Integrated Circuits and Other Commodities Used to Train AI Models	(guidance)
05/13/2025	Guidance on Application of General Prohibition 10 (GP10) to People's Republic of China (PRC) Advanced-Computing Integrated Circuits (ICs)	(guidance)
09/02/2025	Revocation of Validated End-User Authorizations in the People's Republic of China	90 FR 42321
09/02/2025	Relaxing Export Controls for Syria	90 FR 42315
09/16/2025	Additions and Revisions to the Entity List	90 FR 44496
09/30/2025	Expansion of End-User Controls To Cover Affiliates of Certain Listed Entities	90 FR 47201
09/30/2025	Revision of Firearms License Requirements	90 FR 47170

A summary of export enforcement actions, including of actions taken to implement end-use monitoring of dual-use, military, and other items subjects to the Export Administration Regulations.

BIS's enforcement of export controls was far stronger in 2025 than 2024, reflecting the Trump Administration's focus on strong enforcement and restoring the power of deterrence.

Three key statistics illustrate this change:

1. Administrative Penalties Imposed:

Calendar Year 2025 – $108 million

Calendar Year 2024 – $10 million

2. Criminal Fines, Forfeitures, and Restitution:

   Calendar year 2025 – $216 million

   Calendar year 2024 – $6 million

3. Indictments and Arrests:

   Calendar year 2025 – 162 indictments

   Calendar year 2024 – 112 indictments

In addition, under the Trump Administration, BIS has concluded several landmark cases, including:

1. *Applied Materials* – Per a settlement agreement announced in February 2026, BIS imposed a $252 million administrative penalty against Applied Materials for exporting semiconductor manufacturing equipment to an Entity List party. This was a statutory maximum penalty and the second largest 'stand-alone' penalty ever imposed by BIS.

2. *Cadence Design Systems* – Per a settlement agreement announced in July 2025, BIS imposed a $95 million administrative penalty against Cadence Design Systems for exporting Electronic Design Automation (EDA) software and hardware to Entity List parties in China critical to that country's nuclear weapons modernization.

3. *United States v. Liaw, et. al*. – Charged in the Southern District of New York in March 2026, BIS-OEE was the co-lead investigative agency in this landmark criminal diversion scheme. The indictment accuses three defendants – Yih-Shyan "Wally" Liaw, Ruei-Tsang "Steven" Chang, and Ting-Wei "Willy" Sun – of conspiring to unlawfully export $2.5 billion of servers manufactured by Super Micro to China through cut-out companies in Southeast Asia. Defendant Liaw was a Super Micro co-founder, executive vice president, and member of the board. If convicted, the defendants face up to 20 years' imprisonment.

BIS investigations resulted in the criminal convictions of 65 individuals and companies for export violations in FY25. These cases led to $83,959,508 in criminal fines, $81,526,291 in forfeitures, $5,270,566 in restitution, and 2,668 months of imprisonment.

BIS completed 53 administrative enforcement actions, imposing $108,070,105 in civil penalties.

BIS completed a significant number of additional preventive enforcement actions in FY25, including the issuance of 455 warning letters, 705 detentions, and 232 seizures. BIS issued 29 Denial Orders against parties convicted under certain federal statutes following their criminal convictions.

In FY25, BIS completed 1,840 end-use checks in 73 countries. Of these, 54 were Pre-License Checks (PLCs), which BIS conducts prior to shipment to prevent the export of sensitive items to unreliable parties, and 1,786 were Post-Shipment Verifications, which assist the U.S. Government in monitoring export transactions to conclusion. Approximately 88% of the checks were conducted by BIS Export Control Officers (ECOs) stationed at U.S. Embassies and Consulates around the world.

The Anti-Boycott Act of 2018, a subpart of ECRA, encourages, and in specified cases requires, U.S. persons to refuse to participate in certain unsanctioned foreign boycotts. BIS, through its Office of Antiboycott Compliance (OAC), takes enforcement action against U.S. persons who violate the antiboycott provisions set forth in part 760 of the EAR. During FY25, one company agreed to pay civil penalties totaling $44,750 to settle allegations that they violated the antiboycott provisions of the EAR.

See Appendix B: FY25 Criminal Convictions
See Appendix C: FY25 Administrative Cases
See Appendix D: FY25 Summary of Antiboycott Cases
See Appendix E: FY25 Boycott Requests Reported to the Office of Antiboycott Compliance

A summary of approved license applications to proscribed persons.

As noted above, the Biden Administration granted over 2,100 licenses for companies on the Entity List. The majority of these were for SMIC and Huawei. By contrast, in Q2 through Q4 2025, BIS has granted only new 16 licenses to companies on the Entity List, and only for unusual situations such as winding down operations in sanctioned countries.

Efforts undertaken within the previous year to comply with the requirements of section 1759, including any critical technologies identified under such section and how or whether such critical technologies were controlled for export.

BIS worked throughout FY25 to identify critical and emerging technologies, take actions to address associated national security concerns, and work with foreign partners to address threats abroad. This work will lead to the issuance of new export controls on critical technologies.

A summary of industrial base assessments conducted during the previous year by the Department of Commerce, including with respect to counterfeit electronics, foundational technologies, and other research and analysis of critical technologies and industrial capabilities of key defense-related sectors.

In FY25, the Office of Strategic Industries and Economic Security (SIES) began conducting a survey and assessment of the U.S. kinetic munitions supply chain in partnership with the Department of War (DoW). This assessment explores barriers that prevent companies from operating in the kinetic munitions industrial base, including qualification costs, to inform DoW processes and potential modifications to federal acquisition regulations. This BIS survey will provide DoW detailed insights to identify which rules and affiliated costs most influence participation in the kinetics market.

SIES also began work on a survey and assessment of the U.S. chemical industrial base in partnership with the Department of Health & Human Services (HHS). This study focuses on suppliers of precursor chemicals (commonly known as key starter materials) used in the production of active pharmaceutical ingredients and finished pharmaceutical products. This effort constitutes the third HHS-sponsored BIS survey and assessment in the last five years.

APPENDIX A: CHRONOLOGICAL LISTING OF REGULATORY ACTIONS

(January 20, 2025 to September 30, 2025)

Publication Date	Title	Federal Register Citation
02/14/2025	Implementation of Additional Due Diligence Measures for Advanced Computing Integrated Circuits; Amendments and Clarifications; and Extension of Comment Period; Correction	90 FR 9604
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APPENDIX B: CRIMINAL CONVICTIONS DURING FISCAL YEAR 2025

Sentencing Date	Defendant	Criminal Charges	Criminal Sanctions	Case Details
10/02/2024	Feliks Medvedev	One count of conducting an unlicensed money transmitting business in violation of 18 U.S.C. § 1960	46 months in prison; three years of supervised release; a $10,000 criminal fine; and a $100 special assessment	Trade-based money laundering scheme in which millions of dollars were funneled through the United States for enterprises in Russia
10/04/2024	Ruben Quintero-Martinez	One count of conspiracy to distribute heroin and fentanyl in violation of 21 U.S.C. § 846 and 21 U.S.C § 841	14 months in prison; and three years of supervised release	Drones to Mexico to facilitate narcotics smuggling
10/04/2024	David Cruz Hernandez	One count of conspiracy to engage in the business of dealing in firearms without a license and to deliver firearms to a carrier without written notice in violation of 18 U.S.C. § 371; unlawful shipment of firearms by an alien in violation of 18 U.S.C. § 922	84 months in prison; three years of supervised release; and a $200 special assessment	Firearms and components to Mexico
10/15/2024	Iddris Ibrahim	One count of submission of false export documentation in violation of 13 U.S.C. § 305	Six months of home confinement; two years of probation; a $4,000 criminal fine; and a $100 special assessment	Filing False Electronic Export Information (EEI) in furtherance of stolen vehicle smuggling operation

10/24/2024	Yuksel Senbol	One count of conspiracy to defraud the U.S. Government in violation of 18 U.S.C. § 286; one count of conspiracy to commit wire fraud in violation of 18 U.S.C. § 1349; nine counts of wire fraud in violation of 18 U.S.C. § 1343; seven counts of money laundering in violation of 18 U.S.C. § 1957; five counts of conspiracy to commit export control violations and violation of the Export Control Reform Act of 2018 in violation of 50 U.S.C. § 4819; one count of violation of the Arms Export Control Act in violation of 22 U.S.C. § 2778	15 months in prison; three years of supervised release; $296,781 in restitution; and a $2,500 special assessment	U.S. Air Force tech-related data to foreign national
11/07/2024	Irvin Rodarte	One count of conspiracy to defraud the United States in violation of 18 U.S.C. § 371; one count of engaging in the firearms business without a license in violation of 18 U.S.C. § 922; three counts of false statement during purchase of a firearm in violation of 18 U.S.C. § 922; one count of violation of travel into or within the United States with the intent to engage in the firearms business without a license in violation of 18 U.S.C. 924; and one count of shipping, transport, or receipt of a firearm with intent to commit a felony in violation of 18 U.S.C. § 924	27 months in prison; three years of supervised release; and a $700 special assessment	Firearms and ammunition to Mexico
11/15/2024	George Semerene	One count of conspiracy to unlawfully export goods from the U.S. in violation of 50 U.S.C. § 1705	30 months in prison; three years of supervised release; and a $100 special assessment	Aircraft parts to Specially Designated National in Venezuela

11/13/2024	Stanislav Romanyuk	One count of international money laundering conspiracy in violation of 18 U.S.C. § 1956	33 months in prison; three years of supervised release; and a $100 special assessment	Jig grinder to Russia
11/15/2024	Jonathan Thyng	One count of conspiracy to commit federal offenses in violation of 18 U.S.C. § 371	Five years of probation; 25 hours of community service; and a $100 special assessment	Toxins and chemicals to China
11/21/2024	Debra Lynn Mercer-Erwin	One count of conspiracy to manufacture and distribute cocaine in violation of 21 U.S.C. § 846, 841; one count of conspiracy to manufacture and distribute cocaine intending, knowing, and with reasonable cause to believe that the cocaine will be unlawfully imported into the United States in violation of 21 U.S.C. § 959, 960, 963; one count of conspiracy to commit money laundering in violation of 18 U.S.C. § 1956 and 1957; and one count of conspiracy to commit money fraud in violation of 18 U.S.C. §1349, 1343	192 months in prison; five years of supervised release; and a $400 special assessment	Export of aircraft in support of smuggling and money laundering activities
11/21/2024	Richard Allen	One count of conspiracy to steal government property in violation of 18 U.S.C. § 371; one count of conspiracy to commit money laundering in violation of 18 U.S.C. § 1956; two counts of money laundering in violation of 18 U.S.C. § 1956; one count of money laundering in violation of 18 U.S.C. § 1957; two counts of international money laundering in violation of 18 U.S.C. § 1956	18 months in prison; three years of supervised release; $100,000 in restitution; and a $700 special assessment	U.S. Government equipment, including tactical gear stands, to China and Russia

11/21/2024	Amin Betuni	One count of smuggling goods from the United States in violation of 18 U.S.C. § 554	46 months in prison; two years of supervised release; and a $100 special assessment	Firearms parts to Israel
11/26/2024	Apolinar Rojas	One count of causing the shipment of firearms in violation of 18 U.S.C. § 922	Three years of probation; and a $100 special assessment	Firearms to the Dominican Republic
12/16/2024	Vasilii Besedin	One count of conspiracy to violate the Export Control Reform Act in violation of 50 U.S.C. § 4819	24 months in prison; and three years of supervised release	Aircraft parts to Russia
01/15/2025	Demetrius Randolph, Jr.	One count of conspiracy to deal in firearms without a license in violation of 18 U.S.C. § 371	Five months in prison; two years of supervised release with first five months in home detention; and a $100 special assessment	Firearms to Canada
01/17/2025	Jose Garcia-Cervantes	One count of conspiracy to smuggle goods from the United States in violation of 18 U.S.C. § 371 and 18 U.S.C. § 554	57 months in prison; three years of supervised release; and a $100 special assessment	Rifle parts to Mexico
1/30/2025	Henry Feliz	One count of conspiracy to traffic firearms in violation of 18 U.S.C. § 371; one count of unlawful dealing of firearms in violation of 18 U.S.C. § 922; one count of unlawful transport of firearms to an out-of-state recipient in violation of 18 U.S.C. 922	115 months in prison; three years of supervised release; and a $300 special assessment	Firearms to Dominican Republic

02/02/2025	Lin Chen	One count of willful violations of the International Emergency Economic Powers Act in violation of 50 U.S.C. § 1705	Four months in prison; one year of supervised release; a $5,000 criminal fine; and a $100 special assessment	Semiconductor manufacturing equipment to Chinese Listed Entity
02/05/2025	Nikolay Goltsev	One count of conspiracy to violate ECRA in violation of 50 U.S.C. § 4819	40 months in prison; one year of supervised release; and a $100 special assessment	Components used in UAVs and guided missile systems and other weapons to sanctioned entities in Russia
02/06/2025	David Cardenas-Ibanez	One count of conspiracy to commit export violations in violation of 18 U.S.C. § 371 and 554; one count of conspiracy to commit money laundering in violation of 18 U.S.C. § 1956	50 months in prison; three years of supervised release; and a $100 special assessment	Aircraft to Mexico in support of narcotics smuggling
02/07/2025	Nikolay Grigorev	One count of conspiracy to defraud the United States in violation of 18 U.S.C. § 371	Four years of probation; a $150,000 criminal fine; and a $100 special assessment	Electronic components to Russia
02/11/2025	Kojo Dartey	One count of false statement or representation made to a Department or Agency of the United States in violation of 18 U.S.C. § 1001; one count of perjury in violation of 18 U.S.C. § 1623	70 months in prison; three years of supervised release; and a $700 special assessment	Firearms to Ghana
02/11/2025	Kurt Brown	One count of making false statements to federal firearms licensee in violation of 18 U.S.C. § 922	Two years of probation; and a $100 special assessment	Firearms to Canada

02/20/2025	Eladio Valerio	One count of unlawful delivery of firearms and ammunition to a carrier in violation of 18 U.S.C. § 922	Time served; three years of probation with first 15 months in home confinement; and a $100 special assessment	Firearms and ammunition to the Dominican Republic
02/21/2025	Gal Haimovich	One count of conspiracy in violation of 18 U.S.C. § 371	24 months in prison; three years of supervised release; $15,000 criminal fine; a $2,024,435 forfeiture; and a $100 special assessment	Aircraft parts to Russia
02/26/2025	Ray Hunt aka Abdolrahman Hantoosh	One count of conspiracy to commit offenses against the United States in violation of 18 U.S.C. § 371	60 months in prison; three years of supervised release; a $62,000 forfeiture; and a $100 special assessment	Petrochemical, energy, industrial equipment to Iran
03/06/2025	Christopher Hagan	One count of conspiracy to transport stolen property in interstate commerce in violation of 18 U.S.C. § 371; one count of conspiracy to sell stolen government property in violation of 18 U.S.C. § 371, 18 U.S.C. § 641	12 months and one day in prison; three years of supervised release; a $10,000 criminal fine; a $150,000 forfeiture; and a $200 special assessment	Laser aiming devices, night vision devices, and rifle optics to China
03/07/2025	Juan Carlos Cruz Ramos	One count of conspiracy to engage in the business dealing in firearms without a license and to deliver firearms to a carrier without written notice in violation of 18 U.S.C. § 371; one count of unlawful shipment of firearms by an alien in violation of 18 U.S.C. § 922	108 months in prison; three years of supervised release; and a $200 special assessment	Firearms and components to Mexico

03/11/2025	Ricardo Sune-Giron	One count of conspiracy to traffic in firearms in violation of 18 U.S.C. § 933; one count of firearms trafficking in violation of 18 U.S.C. § 933; one count of dealing in firearms without a license in violation of 18 U.S.C. § 922; one count of illegal and unlawful alien in possession of a firearm in violation of 18 U.S.C. § 922	168 months prison; three years of supervised release; and a $400 special assessment	Firearms to the Dominican Republic
03/14/2025	Richard Shih	One count of conspiracy to commit offenses against the United States in violation of 18 U.S.C. § 371	60 months in probation; a $20,000 criminal fine; an $85,000 forfeiture; and a $100 special assessment	Oxygen analyzers, emissometers, software, hyperspectral imagers, and analytic equipment to Chinese Listed Entities
03/28/2025	Edgar Jiminez	One count of aiding and abetting straw purchase of a firearm in violation of 18 U.S.C. § 932	37 months in prison; three years of supervised release; and a $100 special assessment	Firearms to Mexico
04/01/2025	Benjamin Alvarado	One count of theft of government property conspiracy in violation of 18 U.S.C. §§641 and 371; one count of interstate transportation of stolen property in violation of 18 U.S.C. § 2314; two counts of money launder aiding and abetting in violation of 18 U.S.C. §1957; and one count of smuggling goods from the United States in violation of 18 U.S.C. § 554	120 months in prison; three years of supervised release; $2,367,780 in restitution; and a $500 special assessment	Theft and export of government-owned optical devices and gas masks to Mexico and Hong Kong
04/01/2025	Darius Alston	One count of theft of government property conspiracy in violation of 18 U.S.C. §§ 371; one count of theft of government property in violation of 18 U.S.C. §641	30 months in prison; three years of supervised release; $618,750 in restitution; and a 200 special assessment	Theft and export of government-owned optical devices and gas masks to Mexico and Hong Kong

04/01/2025	Justin Wallas	One count of theft of government property conspiracy in violation of 18 U.S.C. §§641 and 371; one count of theft of government property in violation of 18 U.S.C. §641	30 months in prison; three years of supervised release; $618,750 in restitution; and a $200 special assessment	Theft and export of government-owned optical devices and gas masks to Mexico and Hong Kong
04/01/2025	Kynyqus Bryant	One count of theft of government property conspiracy in violation of 18 U.S.C. §§641 and 371; one count of theft of government property in violation of 18 U.S.C. §641	Five years of probation; a $2,000 criminal fine; $618,750 in restitution; and a $200 special assessment	Theft and export of government-owned optical devices and gas masks to Mexico and Hong Kong
04/01/2025	Gabriel Taylor	One count of theft of government property conspiracy in violation of 18 U.S.C. §§641 and 371	Five years of probation; $618,750 in restitution; and a $100 special assessment	Theft and export of government-owned optical devices and gas masks to Mexico and Hong Kong
04/02/2025	Oleg Patsulya	One count of conspiracy to export items from the United States without a license in violation of 50 U.S.C. § 4819; one count of conspiracy to commit international money laundering in violation of 18 U.S.C. § 1956	70 months in prison; three years of supervised release; a $4,582,288 forfeiture; and a $200 special assessment	Aircraft parts to Russia
04/09/2025	Sam Issawi	One count of failing to provide required information to United States Customs and Border Protection in violation of 19 U.S.C. § 1436	Time served; a $20,000 criminal fine; and a $25 special assessment	Rifle parts to Canada

04/15/2025	Shavonte Summers	One count of conspiracy to deal in firearms without a license in violation of 18 U.S.C. § 371	Three years of probation; six months of home confinement; 100 hours of community service; and a $100 special assessment	Firearms to Canada
04/23/2025	Jesus Hernandez	One count of aiding and abetting the straw purchase of firearms in violation of 18 U.S.C. § 932	46 months in prison; three years of supervised release; and a $100 special assessment	Firearms and ammunition to Mexico
04/25/2025	Kamran Kirmani	One count of wire fraud in violation of 18 U.S.C. § 1343	24 months in prison; two years of supervised release; a $3,800,000 forfeiture; and a $100 special assessment	Assault rifle to Pakistan as part of a Hawala scheme
05/08/2025	Liming Li	One count of possession of trade secrets in violation of 18 U.S.C. § 1832	12 months and one day in prison; three years of supervised release; a $14,000 criminal fine; $17,674 in restitution; and a $100 special assessment	Theft of trade secrets and export of technology to China
05/15/2025	Angel Velasquez Delgado	One count of aiding and abetting the straw purchase of firearms in violation of 18 U.S.C. § 932; one count of aiding and abetting firearms trafficking in violation of 18 U.S.C. § 933	108 months in prison; three years of supervised release; and a $200 special assessment	Firearms to Mexico

05/23/2025	Edson Aregullin	One count of conspiracy to traffic in firearms in violation of 18 U.S.C. § 933; three counts of trafficking in firearms in violation of 18 U.S.C. § 933; and three counts of false statements to a federal firearms licensee in violation of 18 U.S.C. § 922	71 months in prison; three years of supervised release; and a $700 special assessment	Firearms to Mexico
05/29/2025	David Bohmerwald	One count of violation of the Export Control Reform Act in violation of 50 U.S.C. § 4819	Two years of probation; a $10,000 forfeiture; and a $100 special assessment	Accelerometers to Hong Kong
06/10/25	Hansen Helicopters, Inc.	Four counts of aircraft fraud in violation of 18 U.S.C. § 38; one count of conspiracy to defraud the Federal Aviaton Administration and National Transportation Safety Board in violation of 18 U.S.C. § 371	Five years of probation; a $4,900,000 criminal fine; and a $2,000 special assessment	Helicopter parts to the Philippines
06/10/2025	John Walker	Three counts of aircraft fraud in violation of 18 U.S.C. § 38; 68 counts of employing a mechanic without a mechanic's certificate in violation of 49 U.S.C. § 46306; two counts of employing a pilot without a pilot's certificate in violation of 49 U.S.C. § 43606; two counts of registration violations involving helicopter in violation of 49 U.S.C. § 43606; one count of conspiracy to commit wire fraud in violation of 18 U.S.C. § 1349; two counts of wire fraud in violation of 18 U.S.C. § 1343, 1364 and 3; and two counts of money laundering in violation of 18 U.S.C. § 1957	405 months in prison; two years of supervised release; a $250,000 criminal fine; a $70,177,513 forfeiture; and a $9,900 special assessment	Helicopter parts to the Philippines

06/12/2025	Jesus Paulino	One count of aiding and abetting straw purchase of a firearm in violation of 18 U.S.C. § 932	24 months in prison; three years of supervised release; and a $100 special assessment	Firearms to Mexico
06/20/2025	Jonathan Borja	One count of straw purchase of firearms in violation of 18 U.S.C. § 932	18 months in prison; two years of supervised release; and a $100 special assessment	Firearms to Mexico
06/26/2025	Videsh Chandoo	One count of smuggling goods from the United States in violation of 18 U.S.C. § 554	18 months in prison; three years of supervised release; and a $100 special assessment	Firearms and ammunition to Trinidad & Tobago
07/07/2025	Nikolaos Bogonikolos	One count of wire fraud conspiracy in violation of 18 U.S.C. § 1349 & 1343; one count of conspiracy to violate the Export Control Reform Act in violation of 50 U.S.C. § 4819	Time served (15 months in prison); $451,000 in restitution; and a $200 special assessment	Oscilloscopes and spectrum analyzers to Russia
07/08/2025	Joe Cano	One count of felon in possession of a firearm in violation of 18 U.S.C. § 922	57 months in prison; three years of supervised release; and a $100 special assessment	Export of firearms and ammunition to Mexico
07/23/2025	Brian Assi	One count of conspiracy in violation of 18 U.S.C. § 371; one count of attempted unlawful export in violation of 50 U.S.C. § 1705; one count of attempted smuggling of goods from the United States in violation of 18 U.S.C. § 554; one count of submitting false or misleading export information in violation of 13 U.S.C. § 305; and one count of conspiracy to commit money	44 months in prison; one year of supervised release; and a $500 special assessment	Blasthole drill and parts to Iran

		laundering in violation of 18 U.S.C. § 1956		
08/07/2025	Jesus Andres	Two counts of aiding and abetting false statements on a firearm transaction record in violation of 18 U.S.C. § 922 and 924	18 months in prison; two years of supervised release; and a $200 special assessment	Firearms to Mexico
08/06/2025	Cadence Design Systems, Inc.	One count of conspiracy to commit export violations in violation of 18 U.S.C. § 371	Three years of probation; a $78,488,507.98 criminal fine; and a $400 special assessment	Electronic design automation hardware and software and semiconductor design technology to Chinese Listed Entity
08/14/2025	ServisMed LLC	One count of conspiracy to violate the Federal Insecticide, Fungicide, and Rodenticide Act in violation of 18 U.S.C. § 371	$40,000 criminal fine; $13,330 in restitution; and a $25 special assessment	Distribution of unregistered pesticides
08/14/2025	Jean Wiltene Eugene	One count of smuggling goods into the United States in violation of 18 U.S.C. § 554	30 months in prison; two years of supervised release; a $20,000 criminal fine; 100 hours of community service; and a $100 special assessment	Firearms to Haiti
08/18/2025	Shenghua Wen	One count of conspiracy to violate the International Emergency Economic Powers Act in violation of 50 U.S.C. § 1705; one count of acting in the United States as an illegal agent of a foreign government in violation of 18 U.S.C. § 951	96 months in prison; three years of supervised release	Firearms and ammunition to North Korea

08/19/25	Vadim Yermolenko	One count of conspiracy to defraud the United States in violation of 18 U.S.C. § 371; one count of bank fraud conspiracy in violation of 18 U.S.C. § 1349/1344; one count of conspiracy to violate the Export Control Reform Act in violation of 50 U.S.C. § 4819	30 months in prison; two years of supervised release; a $75,547 forfeiture; and a $300 special assessment	Oscilloscopes and spectrum analyzers to Russia
08/22/2025	Alexey Brayman	One count of conspiracy to defraud the United States in violation of 18 U.S.C. § 371	Two years of probation; 50 hours of community service; $10,000 criminal fine; a $6,000 forfeiture; and a $100 special assessment	Oscilloscopes and spectrum analyzers to Russia
08/22/2025	Ariel Aldair Lasso Gil	One count of conspiracy in violation of 18 U.S.C. § 371; one count of delivery of a firearm to a common carrier without written notification in violation of 18 U.S.C. § 922	30 months in prison; two years of supervised release; and a $200 special assessment	Firearms and machine gun conversion device to Panama
09/09/2025	Gregory Munoz	One count of attempt or conspiracy to commit wire fraud in violation of 18 U.S.C. § 1349	18 months in prison; three years of supervised release; and a $100 special assessment	Toxins and chemicals to China
09/22/2025	Glenn Stepul	One count of conspiracy to defraud the United States in violation of 18 U.S.C. § 371	Two years in prison; one year of supervised release; and a $100 special assessment	Firearms parts to Ukraine

* Two sentencings during FY2025 were sealed by the court and do not appear in this table.

APPENDIX C: ADMINISTRATIVE CONVICTIONS DURING FISCAL YEAR 2025

Order Date	Respondent	Case Details	Provision Violated [# of violations]	Penalty
10/04/24	URAL Airlines JSC	Temporary denial order (TDO) in matter that involved operating multiple aircraft subject to the EAR and classified under ECCN 9A991, on international flights, including from Bishkek, Kyrgyzstan; Dushanbe, Tajikistan; Khudzhand, Tajikistan and Tamchy, Kyrgyzstan to Russia after March 2, 2022, without the required BIS authorization.		TDO renewed for one year.
10/29/24	Mahan Airways; Pejman Mahmood Kosarayanifard, a/k/a Kosarian Fard; Mahmoud Amini; Kerman Aviation, a/k/a GIE Kerman Aviation; Sirjanco Trading LLC; Mahan Air General Trading LLC; Mehdi Bahrami; Al Naser Airlines, a/k/a Al-Naser Airlines, a/k/a Alnaser Airlines and Air Freight Ltd.; Ali Abdullah Alhay, a/k/a Ali Alhay, a/k/a Ali Abdullah Ahmed Alhay; Bahar Safwa General Trading; Sky Blue Bird Group, a/k/a Sky Blue Bird Aviation, a/k/a Sky Blue Bird Ltd., a/k/a Sky	TDO in matter that has involved the reexport and attempted or intended reexport of U.S.-origin Boeing 747s, false statements to BIS regarding the ultimate destination and end-user of these aircraft, and the failure to comply with a BIS order to return the aircraft to the United States. This matter also has involved exports and reexports, or attempted or intended exports or reexports, during renewal periods of the TDO of U.S.-origin McDonnell Douglas aircraft, Airbus aircraft with U.S-origin engines, U.S.-origin jet engines, and other items subject to the Regulations.		TDO renewed for one year.

	Blue Bird FZC; and Issam Shammout, a/k/a Muhammad Isam Muhammad Anwar Nur Shammout, a/k/a Issam Anwar			
11/01/24	GlobalFoundries U.S. 2 LLC and GlobalFoundries U.S. Inc.	Exported from the United States without authorization from BIS approximately 5,697 silicon wafers, items subject to the EAR and valued at approximately $17,101,679, to SJ Semiconductor ("SJS"), a Chinese company listed on the BIS Entity List. The items are classified under Export Control Classification Number ("ECCN") 5A991.g and controlled for anti-terrorism reasons, or designated EAR99.	764.2(a) [74]	Settlement Agreement – civil penalty of $500,000.
11/05/24	Rossiya Airlines	TDO in matter that involved prohibited conduct by operating aircraft subject to the EAR on flights into Russia without the required BIS authorization, and there are heightened concerns of future violations.		TDO renewed for one year.
11/15/24	M&M Wireless, Inc., Moheed Latif, Hamza Latif and Abdu Latif Chaudhry	Made false and misleading statements and falsified material facts for the purpose of undervaluing exports; failed to comply with recordkeeping requirements.	764.2(g) [4] 764.2(i) [90]	Settlement Agreement – export privileges denied for three years, all of which is suspended; complete export compliance training on the Regulations within twelve (12) months.
12/06/24	Siberian Airlines d/b/a S7 Airlines	TDO in matter that involved prohibited conduct by operating aircraft subject to the EAR on flights into Russia without the required BIS authorization, and there are heightened concerns of future violations.		TDO renewed for one year.
12/06/24	Nordwind Airlines	TDO in matter that involved prohibited conduct by operating aircraft subject to the EAR on flights into Russia without the required BIS		TDO renewed for one year.

		authorization, and there are heightened concerns of future violations.		
12/17/24	Integra Technologies, Inc.	Sold and exported transistors and related products including Common High Priority List (CHPL) items, valued at approximately $6,679,009, via two third-party distributors to eight different Russian end users without any license or authorization from BIS. (EAR99)	764.2(a) [94]	Settlement Agreement – civil penalty of $3,300,000, of which $1,500,000 is suspended.
12/20/24	The Indium Corporation of America	Exported solder preforms, solder wires and solder ribbon, valued at $96,505.89 to Russia without the required license or other authorization from BIS. (EAR99)	764.2(a) [11]	Settlement Agreement – civil penalty of $180,000.
12/20/24	Unicat Catalyst Technologies, LLC	Sold and arranged for the export of catalysts, valued at $391,182.78, with knowledge that these items were intended for the export to Iran without the required license or other authorization. (EAR99)	764.2(e) [3]	Settlement Agreement – civil penalty of $391,183, of which payment of the OFAC civil penalty pursuant to the terms of the OFAC Settlement Agreement shall be credited towards the $391,183 penalty amount due; three-year suspended denial of export privileges; and provide copies of annual certification and written explanation required under the OFAC

				Settlement Agreement.
12/31/24	Daniel Ray Lane	Underlying criminal conviction for violating IEEPA by conspiring to sell sanctioned Iranian petroleum/crude oil to a refinery in China.	Section 1705 of IEEPA	Export privileges denied until June 11, 2034, under ECRA. (10 years)
12/31/24	Derby Clerfe	Underlying criminal conviction for violating 18 U.S.C. § 371 by conspiring with others to export from the United States to Haiti nine handguns without the required licenses and without filing Electronic Export Information on the Automated Export System.	18 U.S.C. § 371	Export privileges denied until May 30, 2026, under ECRA. (2 years)
12/31/24	Eric Nan Kofi Ampong-Coker	Underlying criminal conviction for violating 50 U.S.C. § 4819 by knowingly and willfully attempting to export one (1) SCCY Industries LL.C., Model CPX-2 9mm handgun; one (1) Mossberg 9mm handgun; one (1) Smith & Wesson 9mm handgun; one (1) FIS Product, Model XD-9 9mm handgun; and one (1) Sarsilmaz (Sar Arms), 9mm handgun, which weapons were designated under ECCN 0A501 from the United States to Ghana without the required licenses.	50 U.S.C. § 4819	Export privileges denied until September 6, 2033, under ECRA. (10 years)
12/31/24	Joel Alejandro Garzo-Corona	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling 2,399 rounds of assorted ammunition from the United States to Mexico without the required authorization from the U.S. Department of Commerce.	18 U.S.C. § 554(a)	Export privileges denied until February 16, 2031, under ECRA. (8 years)
01/17/25	Haas Automation, Inc.	Caused, aided or abetted the shipments of Computer Numerical Control (CNC) machine parts, valued at approximately $29,254, to Entity-Listed parties in Russia and China without the required authorization; filed inaccurate EEI for certain shipments to Russia. (EAR99)	764.2(b) [41] 764.2(a) [1]	Settlement Agreement – civil penalty of $1,500,000, of which $9,000 is suspended until Haas makes payment of the

				imposed OFAC civil penalty; conduct two audits of its export compliance program.
01/31/25	Azur Air	TDO in matter that involved prohibited conduct by operating aircraft subject to the EAR on flights into Russia without the required BIS authorization, and there are heightened concerns of future violations.		Modified the September 20, 2024 TDO to update the address.
02/06/25	Kirill Gordei, Apelsin Logistics Inc., FC Marakanda 7777 LLC, Alinda Chemical Trade Company LTD, Element Uluslararasi Nakliyat Ve Lojistick Tic. LTD, Astec Astronomy FZCO, and AvioChem	TDO in matter that involved the transshipment of U.S.-origin goods to Russia by communicating with parties in Russia and Türkiye to instruct them on how to circumvent U.S. export controls, falsifying shipping documentation, and utilizing freight forwarders located abroad in order to transship items to Russia.		Initial TDO issued for 180 days.
03/31/25	ExHigh Air Space Ltd., Geoffrey Chune Omariba, Nader Ali Saboori Haghighi	TDO in matter that involved prohibited conduct by engaging in a scheme to export, reexport, and transfer (in-country) aircrafts parts to or within Russia, including to persons on the Denied Person's List.		Initial TDO issued for 180 days.
03/31/25	Aviastar-TU	TDO in matter that involved prohibited conduct by operating aircraft subject to the EAR on flights into Russia without the required BIS authorization, and there are heightened concerns of future violations.		TDO renewed for one year.
05/16/25	Arlando Torres	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling and attempting to smuggle from the United States to Mexico, 1,680 rounds of 5.56mm ammunition, 1,000 rounds of 10mm ammunition, 3,200 rounds of 7.62x39mm ammunition, and 50 rounds of 7.62x25mm ammunition.	18 U.S.C. § 554(a)	Export privileges denied until March 1, 2033, under ECRA. (10 years)

05/16/25	Carlos Orlando Ledesma	Underlying criminal conviction for violating 18 U.S.C. § 371 by conspiring to export stolen outboard engines from the United States to Mexico.	18 U.S.C. § 371	Export privileges denied until May 23, 2030, under ECRA. (7 years)
05/16/25	Osmani Valdivia Perez	Underlying criminal conviction for violating 18 U.S.C. § 371 by conspiring to export stolen outboard engines from the United States to Mexico.	18 U.S.C. § 371	Export privileges denied until May 19, 2030, under ECRA. (7 years)
05/16/25	Robert Marrero-Cisneros	Underlying criminal conviction for violating 18 U.S.C. § 371 by conspiring to export stolen outboard engines from the United States to Mexico.	18 U.S.C. § 371	Export privileges denied until May 19, 2030, under ECRA. (7 years)
05/16/25	Sergey Karpushkin	Underlying criminal conviction for violating 18 U.S.C. § 371 by conspiring with others to purchase and receive over $139 million in metal products from companies owned by a sanctioned oligarch.	18 U.S.C. § 371	Export privileges denied until April 17, 2034, under ECRA. (10 years)
05/16/25	Steve Trevino	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling firearms from the United States to Mexico.	18 U.S.C. § 554(a)	Export privileges denied until December 19, 2033, under ECRA. (10 years)
06/27/25	Alpha and Omega Semiconductor Incorporated	Exported approximately 1,650 EAR99 power controllers, smart power stages, and demo boards to Huawei, an entity on BIS Entity List, with knowledge that violations would occur. (EAR99)	764.2(a) [4] 764.2(e)[11]	Settlement Agreement – civil penalty of $4,250,000.
07/28/25	Cadence Design Systems, Inc.	Exported, and later transferred or attempted to transfer, Electronic Design Automation (EDA) hardware and software and semiconductor design technology, valued at $45,305,317.41 and controlled for Anti-Terrorism reasons, to BIS Entity List party National University of Defense Technology (NUDT) in China under the alias Central South CAD Center (CSCC) with knowledge	764.2(a) [3] 764.2(c) [1] 764.2(e) [57]	Settlement Agreement – civil penalty of $95,312,000, of which $47,656,000 shall be suspended until criminal penalty payment

		or reason to know that violations would occur. (3B991b.2.c, 3D991, 3E991 and EAR99)		is made to the U.S. Department Justice; and complete two internal audits of its export control compliance program.
07/29/25	Andritz Inc.	Reexported refiner plates, valued at $3,154,794.36, from an affiliated in German to Russia, without the required license or authorization from BIS. (EAR99)	764.2(a) [36]	Settlement Agreement – civil penalty of $1,577,397.18.
08/26/25	Cesar David Piz Corona	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling a Springfield Armory XDm 9mm handgun and a Beretta M9 from the United States to Mexico.	18 U.S.C. § 554(a)	Export privileges denied until November 17, 2028, under ECRA. (5 years)
08/26/25	Fares Abdo Al Eyani	Underlying criminal conviction for violating 18 U.S.C. § 371 and Section 38 of the AECA by conspiring and attempting to illegally export or cause to be exported defense articles to the Sultanate of Oman, without an export license, and in knowing and willful violation of the AECA and the International Traffic in Arms Regulations.	18 U.S.C. § 371 and Section 38 of the AECA	Export privileges denied until March 29, 2034, ECRA. (10 years)
08/26/25	Damian Alejandro Vidal	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling one Sig Sauer, model 1911 .45 caliber handgun and one Glock, model 19, 9mm handgun, from the United States to Mexico, without having first obtained the required licenses.	18 U.S.C. § 554(a)	Export privileges denied until May 16, 2032, under ECRA. (8 years)
08/26/25	Francisco Dario Mora	Underlying criminal conviction for violating 18 U.S.C. § 371 and 18 U.S.C. § 554 by conspiring to smuggle firearms, ammunition and magazines from the United States to Mexico.	18 U.S.C. § 371 and 18 U.S.C. § 554(a)	Export privileges denied until May 10, 2031, under ECRA. (10 years)

08/26/25	Gabriel Daniel Pinnace	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling firearms from the United States to Venezuela.	18 U.S.C. § 554(a)	Export privileges denied until May 1, 2034, under ECRA. (10 years)
08/26/25	Guadalupe Gil	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling one thousand (1000) rounds of .45 caliber ammunition and two thousand (2000) rounds of 9mm ammunition from the United States to Mexico.	18 U.S.C. § 554(a)	Export privileges denied until November 30, 2033, under ECRA. (10 years)
08/26/25	Martina Juanita Gil	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling one thousand (1000) rounds of .45 caliber ammunition and two thousand (2000) rounds of 9mm ammunition from the United States to Mexico.	18 U.S.C. § 554(a)	Export privileges denied until October 10, 2028, under ECRA. (5 years)
08/26/25	Imelda Jimenez	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling firearms from the United States to Mexico.	18 U.S.C. § 554(a)	Export privileges denied until June 8, 2030, under ECRA. (7 years)
08/26/25	Jessica Alvarado	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling thirty-three 7.62x39 caliber rifles, three 5.56 caliber rifles, one Ruger .22 caliber carbine rifle, two .45 caliber pistols, and thirty-nine ammunition magazines from the United States to Mexico, without a license or written approval from the U.S. Department of Commerce.	18 U.S.C. § 554(a)	Export privileges denied until April 18, 2034, under ECRA. (10 years)
08/26/25	Jose Guadalupe Mejia	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by attempting to export 701 rounds of assorted ammunition from the United States to Mexico, without the required authorization from the U.S. Department of Commerce.	18 U.S.C. § 554(a)	Export privileges denied until June 11, 2034, under ECRA. (10 years)
08/26/25	Juan Manuel Cervantes-Aceves	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling firearms and magazines from the United States to Mexico.	18 U.S.C. § 554(a)	Export privileges denied until November 30,

				2033, under ECRA. (10 years)
08/26/25	Kamir Armando Brown Blanchard	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by unlawfully exporting firearms from the United States to Panama.	18 U.S.C. § 554(a)	Export privileges denied until July 12, 2034, under ECRA. (10 years)
08/26/25	Maxim Marchenko	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by unlawfully causing companies in the United States to export OLED micro-displays from the United States to Russia.	18 U.S.C. § 554(a)	Export privileges denied until July 17, 2034, under ECRA. (10 years)
08/26/25	Miguel Barrera	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by concealing and exporting from the United States, and attempting to export from the United States, firearms and firearms components, knowing that the export of such firearms and firearms components was contrary to law.	18 U.S.C. § 554(a)	Export privileges denied until August 6, 2034, under ECRA. (10 years)
08/26/25	Prince Bediako	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling fraudulently obtained vehicles from the United States to Ghana.	18 U.S.C. § 554(a)	Export privileges denied until December 5, 2030, under ECRA. (7 years)
08/26/25	Vladimir Kuznetsov	Underlying criminal conviction for violating Section 38 of the AECA by knowingly and willfully exporting and attempting to export from the United States to Russia without obtaining required U.S. government authorization rifle parts and accessories designated as defense articles on the United States Munitions List, to wit: one Accuracy International AICS AX MK II rifle chassis, one "H-S Precision" aluminum rifle stock, one "Kinetic Research Group" savage 180-Alpha rifle chassis, one Dakota bolt shroud, one Timney Sportsman trigger assembly, multiple firearm magazines, and other firearms accessories.	Section 38 of the AECA	Export privileges denied until April 30, 2034, under ECRA. (10 years)

08/26/25	Chrissie Fier Williams	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by attempting to export or send firearms, firearms parts and components, and ammunition from the United States to Trinidad & Tobago without required authorization.	18 U.S.C. § 554(a)	Export privileges denied until June 21, 2034, under ECRA. (10 years)
08/26/25	Pedro Cruz Almeida, Jr.	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling nine hundred (900) rounds of Lake City .50 caliber tracer-equipped linked ammunition, from the United States to Mexico, without the required authorization from the U.S. Department of Commerce.	18 U.S.C. § 554(a)	Export privileges denied until August 31, 2033, under ECRA. (10 years)
08/26/25	Jasmine Desire Gallegos	Underlying criminal conviction for violating 18 U.S.C. § 554(a) by smuggling firearms from the United States to Mexico.	18 U.S.C. § 554(a)	Export privileges denied until February 14, 2034, under ECRA. (10 years)
09/16/25	UTair Aviation JSC	TDO in matter that involved prohibited conduct by operating aircraft subject to the EAR on flights into Russia without the required BIS authorization, and there are heightened concerns of future violations.		TDO renewed for one year.
09/16/25	PJSC Aeroflot	TDO in matter that involved prohibited conduct by operating aircraft subject to the EAR on flights into Russia without the required BIS authorization, and there are heightened concerns of future violations.		TDO renewed for one year.
09/16/25	Azur Air	TDO in matter that involved prohibited conduct by operating aircraft subject to the EAR on flights into Russia without the required BIS authorization, and there are heightened concerns of future violations.		TDO renewed for one year.
09/30/25	URAL Airlines JSC	TDO in matter that involved operating multiple aircraft subject to the EAR and classified under ECCN 9A991, on international flights, including from Bishkek, Kyrgyzstan; Dushanbe, Tajikistan; Khudzhand, Tajikistan and Tamchy,		TDO renewed for one year.

		Kyrgyzstan to Russia after March 2, 2022, without the required BIS authorization.		
09/30/25	Luminultra Technologies Inc.	Sold and exported three PhotonMaster luminometers and twenty-five aqueous test kits, designated as EAR99 items and valued at $33,661, with knowledge that the items were destined to Iran without the required license and made false and misleading representations, statements, and certifications, in connection with the submission of an EEI filing.	764.2(e) [1] 764.2(g) [1]	Settlement Agreement – civil penalty of $685,051; complete export compliance audits annually for three years; employees shall complete export compliance training and be subject to a three-year suspended denial of export privileges.
09/30/25	Hallewell Ventures, Ltd.	Reexported a Bombardier Global 7500 Aircraft from the Maldives to Russia without the required BIS license. (ECCN 9A991.b)	764.2(a) [1]	Settlement Agreement – civil penalty of $374,474.

APPENDIX D: SUMMARIES OF ANTIBOYCOTT CASES AND BOYCOTT REQUESTS FOR FISCAL YEAR 2025

Company Name & Location	Date Order Signed	Alleged Violations of EAR	Settlement Amount
General Dynamics Ordnance and Tactical Systems, Inc. (Saint Petersburg, FL)	05/29/25	2 x 760.2(d) - Furnishing information about business relationships with boycotted countries or blacklisted persons 1 x 760.5 - Failure to report receipt of a boycott request	$44,750

APPENDIX E: BOYCOTT REQUESTS REPORTED TO THE OFFICE OF ANTIBOYCOTT COMPLIANCE FOR FISCAL YEAR 2025

Country	Prohibited Boycott Requests	Permissible Boycott-Related Requests	Amended Boycott Requests	Boycott Exceptions	Totals
Algeria	0	0	0	3	3
Bahrain	39	0	0	0	0
Iraq	0	1	0	1	41
Jordan	9	0	0	0	0
Kuwait	1	0	1	18	28
Lebanon	0	0	0	1	2
Libya	1	2	2	2	6
Oman	13	1	1	1	4
Qatar	8	9	9	29	60
Saudi Arabia	0	1	1	37	47
Syria	0	0	0	0	0
United Arab Emirates	0	20	17	4	41
Yemen	0	0	0	0	0
Total (Arab League members)	71	34	31	96	232
Bangladesh	1	3	8	73	85
Iran	0	0	0	0	0

Malaysia	1	1	0	1429	1431
Nigeria	0	0	0	0	0
Pakistan	3	1	1	226	231
All other Countries	6	1	2	178	187
Total (All countries and Arab League members)	82	40	42	2002	2166

Antiboycott Glossary:

Prohibited boycott-related requests describe those requests to take an action that would be prohibited under Section 760.2 of the EAR, mainly actions to enforce the secondary and tertiary aspects of a foreign unsanctioned boycott.

Permissible boycott-related requests are for actions that fall outside the prohibitions of the EAR but still require compliance with some level of a foreign unsanctioned boycott.

Amended boycott-related requests were ones that were prohibited as an initial matter but were subsequently adjusted and reclassified as permissible or as falling within an exception under the EAR.

Boycott-related exceptions are requests to take actions that would otherwise be prohibited but are allowed under Section 760.3 of the EAR.

####END OF REPORT####