



**NEW YORK UNIVERSITY**  
A private university in the public service

**Office of General Counsel**  
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February 15, 2012

## **OFFICE OF GENERAL COUNSEL MEMORANDUM**

### **U.S. EXPORT CONTROL REGULATIONS**

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*Do you plan to travel to **Cuba, Iran, North Korea, Sudan or Syria** to conduct research, participate in a conference or academic program or for any other reason? Do you plan to send or bring any materials to those countries in connection with your travel?*

*Do you plan to hire someone or purchase something from any of these countries?*

*Are you purchasing for research or other purposes dual use items (commercial items that also may have a military application such as computers, software or pathogens) that will be sent, taken or used overseas, including at NYU Abu Dhabi or NYU Shanghai?*

*Are you hiring or employing in the U.S. a foreign national who will be given access to dual use items?*

If you answered yes to any of the above questions or are engaging or planning to engage in similar activities, a license from the U.S. government may be required prior to commencement. The summary below provides basic information on U.S. Export Control Regulations.

#### **Background**

The University is subject to the laws and regulations of the United States that govern the export of controlled products and dealings with sanctioned countries. These laws and regulations apply not only to the University and its domestic and international subsidiaries but also to, among others, its affiliates, faculty, employees and students (collectively, "University Personnel") while such University Personnel are studying, teaching, conducting research or otherwise engaged in activities as part of or on

behalf of the University. Violations of these laws and regulations can lead to severe penalties for the University, as well as criminal and civil sanctions for University Personnel.

## **Regulations**

The primary U.S. export control regulations are:

- **The Export Administration Regulations**, which are administered by the Department of Commerce and govern the export of dual use items and their technology.
- **The International Traffic in Arms Regulations**, which are administered by the Department of State and govern the export of certain munitions and defense articles and services.
- **The Foreign Asset Control Regulations**, which are administered by the Office of Foreign Assets Control of the Department of the Treasury and govern economic and trade sanctions, including embargoes and travel restrictions, against targeted foreign countries, regimes, entities and individuals.
- **The Export Administration Act and the Ribicoff Amendment to the Tax Reform Act of 1976**, which are administered by the Department of Commerce and the Internal Revenue Service, respectively, and govern participation in a boycott of a country that has not been approved by the U.S. government.

## **Further Resources**

The Office of Compliance and Risk Management and the Office of General Counsel are available to assist you with your particular situation.

A more detailed summary of the export control regulations and additional resources can be found on the [Export Control Regulations - Summary page](#).

If you have legal questions about U.S. Export Controls Regulation, you can find a member of the Office of General Counsel who practices in this area by visiting our [practice areas page](#) and scrolling to “Global”.

You also may contact the [Office of Compliance and Risk Management](#).