

Government Imposes New Screening Requirements For Overseas Transactions

July 26, 2006

The U.S. Department of Commerce announced an amendment to the Export Administration Regulations ("EAR") by issuing a General Order (a copy of which is attached), referred to as General Order No. 3 of June 5, 2006 ("General Order"), to impose export license requirements where the transaction involves a number of entities located in Dubai, United Arab Emirates.

Why this development is significant is because **no amendment to any of the EAR "Lists"** (the "Denied Persons List", the "Unverified List", and the "Entity List") will be made to include reference to the entities identified in the General Order. Commerce now intends to issue additional General Orders in the future imposing license requirements for exports and reexports to entities and individuals in this unusual manner. **U.S. exporters will have to refer to the General Orders in the EAR directly, and any others published in the future, to properly and completely screen all export transactions subject to Commerce regulations.**

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