



Export Control/CI Nexus

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Export Control/CI Nexus

CI Impetus

- **FBI given concurrent investigative responsibility with DOC to investigate Export Violations**
- **The FBI-CI Division creating new Section focused on Proliferation and Export**
- **FBI/DOC/DHS(ICE) creating “Domain Task Force” for Technology Transfer and Export Control Matters**



Export Impetus

- **Inspector General Audits of FN Access to Sensitive Technologies**
- **DOC/BIS – Stricter Interpretation – Including Deemed Exports and “Not Knowing is No Excuse”**
- **Recognized patterns of particular countries focusing on particular technologies**

Background

- **Deemed Export implies Technology release**
- **Requirements to process a Deemed Export are non-trivial, but Violations can be expensive and generate bad publicity**
- **ANL has multiple potential areas of vulnerability, i.e., Streak Cameras, Lasers, Detectors, Reactors, etc.**
- **Nexus with CI in many areas exists, such as National Security, Nonproliferation, Chem/Bio, Military, Crime Control exists**



Background (Cont)

- **Identification of Deemed Export items in the FV&A process will raise a flag for CI**
- **FV&A, Export Control, Counterintelligence are tightly coupled**
- **Inadequate aspect of any function causes a vulnerability**
- **FBI involvement could broaden laboratory impact implications – Publicity/Legal**



Actions Being Taken

- **Acquired person for the CI group to address EC issues from a CI perspective**
- **Address emerging areas of concern that could put the Laboratory at risk, i.e., ITAR, National Security (DHS), nanotechnology applications, etc.**
- **Expand Laboratory Export Control Awareness Program**
- **Address potential impacts of IG Audits**

