




Memorandum

From: Mark Ginsberg, Provost/Executive Vice President
Deb Dickenson, Executive Vice President for Finance and Administration 

To: All Faculty, Students, and Employees of George Mason University

Subject: Compliance with US Export Controls and Economic Sanctions

Date: September 14, 2023

George Mason University promotes and conducts research to advance knowledge, enhance student learning experiences, and build its reputation in the scientific community. While the University endorses the principles of freedom of inquiry and open exchange of knowledge, it is the policy of the University to comply with all laws applicable to research, including laws and regulations relating to export controls and economic sanctions.

The export of certain technologies, software, and hardware, and the provision of services, technology, or other items outside of the United States is regulated and controlled by federal law for reasons of national security, foreign policy, prevention of the spread of weapons of mass destruction, and competitive trade. The University and all its employees are required to comply with the laws and implementing regulations issued by the Department of State, through its International Traffic in Arms Regulations (“ITAR”), the Department of Commerce, through its Export Administration Regulations (“EAR”), and the Department of the Treasury through its Office of Foreign Assets Control (“OFAC”) regulations (collectively, “Export Control and Sanctions Regulations”). In addition, George Mason University’s work involving exports of certain technology to foreign nationals on campus and anywhere in the United States (“deemed exports”) generally is subject to Export Control and Sanctions Regulations.

While most research conducted on US college and university campuses is excluded from these regulations under the Fundamental Research Exclusion, university research involving specified technologies controlled under the EAR and/or ITAR, or transactions and exchanges with designated countries, individuals, and entities may require the University to obtain prior approval from the appropriate agency before allowing foreign nationals to participate in controlled research, collaborating with a foreign government, company, university, or other organization, and/or sharing research (verbally or in writing) with persons who are not US citizens, permanent residents, asylees, or refugees.

The Export Control and Sanctions Regulations affect not only research conducted on campus, but also travel and shipping items outside the United States. Simply traveling to certain

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sanctioned countries could require a license from OFAC. OFAC sanctions prohibit transactions and exchange of goods and services in certain countries and with designated persons and entities. Multiple lists of denied individuals and parties are maintained and enforced by federal agencies including the Departments of State, Commerce, and Treasury. Shipping items outside the United States as well as taking controlled items, software, or technology on a flight, even if shipping or traveling in the conduct of research, could require a license from these agencies.

Under no circumstances will George Mason University engage in any exports or deemed exports contrary to Export Control and Sanctions Regulations, including provision of services or export of technology or products to entities or individuals in countries that are subject to US economic sanctions. Every George Mason University faculty member, student, and employee shares responsibility for ensuring that George Mason University complies with US Export Control and Sanctions Regulations. Failure to abide by the export policies adopted by George Mason University can result in disciplinary action up to, and including, termination and/or expulsion. **Further, penalties for violations of Export Control and Sanctions Regulations can include substantial fines, imprisonment, and the denial of transaction privileges. The negative publicity resulting from a serious breach can cause irreparable damage to George Mason University's reputation.**

The University has developed training, policies, and procedures that are designed to give our faculty, students, and employees additional tools and information to assist in understanding and complying with these legal requirements. We encourage everyone to access these resources at [Export Controls - Office of Research Integrity and Assurance \(gmu.edu\)](https://www.gmu.edu/export-controls) so that we can work together to protect the integrity and reputation of our University.

If you have any doubt about the applicability of Export Control and Sanctions Regulations to a specific activity, questions about ongoing controlled activities, or would like to report a possible violation of Export Control and Sanctions Regulations, please contact Melissa Perez, Director of Export Compliance and Secure Research in the Office of Research Integrity and Assurance at (703) 993-5522 or export@gmu.edu.

Sincerely,



Deb Dickenson
Executive Vice President,
Finance and Administration



Mark Ginsberg
Provost/Executive Vice President