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BIS Export Enforcement's 2024 Year in Review: Strengthening US National Security Through Strategic Action

WRITTEN BY

Ryan Last

On January 2, 2025, the U.S. Department of Commerce's Bureau of Industry and Security (BIS) Export Enforcement published its [2024 Year in Review](#), spotlighting key accomplishments in protecting U.S. national security. In this report, BIS highlights its expanded enforcement capabilities, impactful actions against illicit procurement networks, and collaborations with industry, academia, and international partners.

Key Highlights of the 2024 Year in Review

1. Disruptive Technology Strike Force Expansion

BIS expanded the geographic reach of its Disruptive Technology Strike Force by adding new units in Texas, Georgia, and North Carolina, and incorporating the Defense Criminal Investigative Service as a partner, now totaling 17 location units. In 2024, the Strike Force brought 15 new criminal cases involving sanctions violations, smuggling conspiracies, and illegal technology transfers, culminating in 26 cases since its inception.

Notable actions include:

- A \$5.8 million penalty was assessed on a global technology company that designs and manufacturers electrical and electric components due to unauthorized exports to Chinese military-linked entities.
- Expansion of the BIS [Entity List](#) by adding parties attempting to enhance China's quantum computing capabilities.

2. Collaborations Targeting Illicit Procurement Networks

BIS collaborated with the U.S. Department of Justice, U.S. Federal Bureau of Investigation, and international partners to dismantle significant procurement networks linked to adversaries such as Russia, China, Iran, and North Korea that attempted to procure controlled, sensitive U.S. technologies.

Major enforcement actions in 2024 included:

- Guilty pleas from multiple individuals for exporting electronic components to Russia for nuclear and missile development.
- A \$3.3 million penalty on a California company for exporting controlled items to Russia.
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Arrests and charges against individuals aiding China's semiconductor development and Iran's military programs.

3. Innovative Strategies to Curb Diversion Risks

To counter high-priority national security item diversions to Russia, BIS introduced groundbreaking measures:

- Entity List designations for 16 addresses in Hong Kong and Türkiye linked to shell companies that allegedly diverted \$130 million in controlled goods.
- [Guidance](#) for exporters, including "red flag" letters and screening best practices.

4. Strengthened Partnerships

BIS deepened collaboration with domestic and international stakeholders, completing more than 1,440 end-use checks across 60 countries. Key initiatives included publishing joint G7 [guidance](#) to prevent Russian export control evasion.

5. Enhanced Academic and Industry Outreach

BIS continued its Academic Outreach Initiative, expanding its reach to 40 universities and publishing [compliance resources](#) tailored to academic institutions. It also issued new guidance for freight forwarders and financial institutions, aligning export compliance with best practices.

6. Strengthened Antiboycott Enforcement

BIS launched the [Boycott Requester List](#) to aid compliance efforts and penalize companies for violations. It imposed nearly \$400,000 in aggregated penalties on four companies and removed more than 40 entities from the list after corrective actions.

7. Entity List Designations

More than 340 parties from China, Russia, Iran, and other nations were added to the Entity List for activities contrary to U.S. security and foreign policy interests. We note that BIS's mantra is that its Entity List is intended to educate offenders and correct behaviors, but also to penalize intentional violations of the Export Administration Regulations and other regulations under its mandate.

Implications for Industry and Academia

BIS's 2024 accomplishments underscore the importance of developing and maintaining robust compliance programs for U.S. exporters, manufacturers, and academic institutions. U.S. exporters, both commercial and academic, must remain vigilant in identifying and addressing risks, such as unauthorized exports, diversion schemes, and boycott-related requests.

BIS recommends that U.S. exporters: (1) conduct thorough due diligence on all parties in export transactions; (2) regularly update compliance programs to incorporate BIS guidance and enforcement trends; and (3) monitor Entity

List changes and BIS advisories for actionable insights.

BIS Export Enforcement's *2024 Year in Review* exemplifies its commitment to safeguarding U.S. technologies and promoting national security through strategic enforcement, collaboration, and innovation. Businesses and academic institutions should leverage these insights to bolster their export compliance efforts and avoid regulatory pitfalls.

Conclusion

This paper is intended as a guide only and is not a substitute for specific legal or tax advice. Please reach out to the author for any specific questions. We expect to continue to monitor the topics addressed in this paper and provide future client updates when useful.

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